GCO | 160 años

# Sustainability Report
# 2023 Non-Financial Information Statement

Grupo Catalana Occidente, S.A.

# Contents
# Sustainability Report – Non-Financial Information Statement

# Letter from the Chairman

2-22

## “Enhancing people's lives is part of our cultural values and our commitment to sustainability”

I begin this letter by highlighting that 2023 has been a year in which, at GCO (Grupo Catalana Occidente), we have continued to drive our commitment to sustainability. A year in which, as a Group, beyond dedicating ourselves to innovation and improving services, we have taken firm steps to continue with the transition towards a more sustainable and egalitarian world, because enhancing people's lives is part of our cultural values and our commitment to sustainability.

In the following pages of this Sustainability Report – Non-Financial Information Statement, you will find all the information on GCO's economic, social and environmental performance through 2023. This document has been drawn up with reference to the standards of the Global Reporting Initiative (GRI) and corresponds to GCO and the entities that comprise it. These are leading companies in the Spanish insurance sector, in the international credit insurance sector and, recently, in the funeral sector in the Iberian Peninsula.

Now, allow me to mention some of the most outstanding sustainable actions in 2023:

**New Sustainability Master Plan**

At GCO, we have dedicated part of 2023 to updating our materiality analysis with the goal of identifying the issues of concern to our stakeholders. For this analysis, we have adopted the double materiality criteria laid down in the European Corporate Sustainability Reporting Directive (CSRD), considering both the financial risks and opportunities arising from ESG issues, together with the Group's impacts on society and the environment.

Following the results of the double materiality analysis, we have updated our Sustainability Master Plan for the period 2024-2026, which is structured under four strategic pillars —good governance, sustainable business, social commitment and environmental responsibility— and a strategic line of reporting and transparency, transversal to them.

**Driving the transition in products and services**

In 2023, we continued to develop more sustainable products and services as a means of fostering the transition to a sustainable economic model.

With regard to products, we have adapted the offering of all our pension plans, unit-linked products and EPSVs to include environmental and/or social features in their management pursuant to article 8 of the SFDR. This follows on from last year, when we adapted the offering of all our investment funds to category 8 of the SFDR, which were approved by the CNMV in February 2023.

We also renewed our insurance for electric vehicles, adding new coverage and specific services for this type of car, with the goal of contributing to more sustainable mobility.

With regard to services, GCO's vehicle repair service was the first to obtain the "Centro Zaragoza Sustainable Workshop Network" certification. This certificate guarantees the commitment of vehicle repair workshops to sustainability and certifies the development of their services following environmental care criteria.

Lastly, I would like to emphasize that we have complied with the main European measures to drive the transition by disclosing the Principal Adverse Impacts (PAIs) in the sustainability factors of the SFDR and the indicators of the Taxonomy Regulation.

**Committed to continue improving environmental performance and the protection of natural capital**

As part of our endeavour to continue improving our environmental performance, in 2023 we implemented an environmental management system pursuant to the ISO 14001 standard covering all management processes of the Group's main real estate assets. This enables us to understand, control and prevent environmental impacts in an orderly and planned manner, and to enhance environmental efficiency and performance.

Furthermore, we also took part in the launch of Nactiva, the first market builder in projects aiming to protect and regenerate natural capital in the Mediterranean area. Within this initiative, we are involved in the development of the MedForest 360 program for the conservation, management and regeneration of Mediterranean forests.

As regards the funeral sector, I would like to highlight the project that Mémora is carrying out with Tree-Nation, a leading international reforestation NGO. Through the In Arboriam project, the company is committed to planting a tree for each service provided. This action has already led to the planting of more than 60,300 trees and the offsetting of render more than 21,000,000 kg of CO2 since 2020.

**Contributing to society's sustainable development**

In the social sphere, internally, one of the major milestones for 2023 is that, as part of the plan for equality, diversity and inclusion, we have set specific targets for female representation as well as maintaining the wage gap below 12% in all professional categories.

Externally, thanks to the participation of our employees, we have conducted corporate volunteer actions to help vulnerable social groups (Cheers4you and Junior Achievement) and care for the environment (World Cleanup Day).

To round off our initiatives in the social sphere, I would like to highlight the work of the Group's Foundation, which under the new name of Fundación Occident has continued to promote its five lines of action: research, business and teaching, cultural actions, sports activities and solidarity initiatives. The memory of the Group's founder, Jesús Serra, will live on throuht the development of strategic projects that will bear his name.

**Acknowledgement of our firm commitment to sustainability**

As a result of our commitment to sustainability, in December 2023, Sustainalytics reviewed our ESG rating, awarding us a rating of 16.9 points. This means that GCO has a low risk of experiencing material financial impacts related to ESG factors. This assessment underscores the efforts we are undertaking to develop sustainable management.

I would like to conclude by thanking all the employees, intermediaries, associates, shareholders and customers who are part of GCO. Thanks to your support and the trust you place in us, we are able to make progress on our goals regarding economic, social and environmental sustainability. We are convinced that together we will be able to build on the best sustainability practices in the years to come.

**José María Serra**

**Chairman**

# Sustainability Report – Non-Financial Information Statement Grupo Catalana Occidente, S. A. 2023

## About this report

This report outlines GCO's sustainability development, results and performance during 2023, as well as its management approach and the challenges it faces.

The Sustainability Report contains the Non-Financial Information Statement (hereinafter, NFIS), forming part of the Management Report, in accordance with Articles 262 of the Capital Companies Law and 49 of the Code of Commerce, meeting the requirements of Law 11/2018. Similarly, this document has been prepared in accordance with the Global Reporting Initiative (GRI) standards. Appendices II and III ("GRI content index" and "Non-Financial Information Statement (NFIS) content index", respectively) contain the list of sustainability indicators that are included throughout this report.

This document has been reviewed, with regard to the information in the NFIS and the GRI content, by an independent external verifier (PricewaterhouseCoopers Auditores, S.L.), in accordance with ISAE Standard 3000, revised and in force, and with the Action Guide on verification engagements of the Non-Financial Information Statement issued by the Spanish Institute of Chartered Accountants.

Likewise, the document is subject to the same approval, filing and publication criteria as the Consolidated Management Report. The assurance report is available on page 83 of this document.

The 10 principles of the United Nations Global Compact have been considered when preparing this document.

## Scope of information

2-2, 3-2

The scope of the information contained herein corresponds to GCO and the entities that comprise it.

On 9 February 2023, GCO acquired 100% of Mémora Servicios Funerarios funeral group. This document only includes information about this company from that moment onward.

On 31 December 2023, with retroactive accounting effect from 1 January 2023, the merger took place of the companies Seguros Catalana Occidente, Plus Ultra Seguros, Seguros Bilbao and GCO Reaseguros, through the absorption by Seguros Catalana Occidente of the remaining companies, merging them under the brand name Occident.

On 31 October 2023, Atradius Re, GCO's reinsurance company, merged into Atradius Crédito y Caución.

The financial information contained in this report is taken from the consolidated annual accounts for the year ended 31 December 2023.

In those cases in which the information reported presents a different scope to that established for this document, this is specified in the corresponding section or table with a footnote.

# 01.

# GCO

# About the Group

2-1, 2-6

GCO is one of the leaders in the Spanish insurance sector and the global credit insurance sector and, more recently, of the funerary sector in the Iberian Peninsula. In its more than 160 years of history, it has experienced constant growth, thanks to its ability to adapt to changes and remain faithful to its genuine essence of insurance.

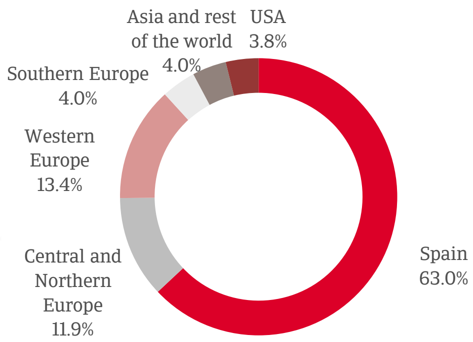
The Group has a presence in more than 50 countries through a diversified and balanced business portfolio, serving more than 3.7 million customers.

Its consolidation as one of the largest Spanish capital insurance groups is largely a result of its acquisition model, which has allowed it to gradually integrate the leading companies in their field or geographical area.

6th biggest insurance group in Spain

1st biggest funeral business group in the Iberian Peninsula

2nd biggest credit insurance group in the world




## Strategic purpose

To be leaders in protecting and guiding people and companies in every stage of life in order to ensure their peace of mind in the present and their trust in the future.

## Main figures

Volume and distribution of business

€5,792.6 +9.7%

52.9% Traditional business
43.2% Credit Insurance business
3.9% Funeral business

Combined ratio

92.6% +1.8 pp Traditional business
74.1% +1.8 pp Credit insurance business

Consolidated profit
€615.5m

Shareholder remuneration
€134.1m

Permanent resources market value
€5,738.8m

**Sound financial structure**

Listed on the stock market.
Stable and committed shareholders.
Rating A (AM Best) and A2 (Moody's).

**Technical rigour**

Excellent non-life combined ratio.
Strict expenditure control.
Prudent and diversified investment portfolio.

# Business model

2-6

GCO's purpose is to be leaders in protecting and guiding people and companies in every stage of life in order to ensure their peace of mind in the present and their trust in the future.

## Insurance business

### Traditional business

The traditional business provides families and small and medium-sized businesses with a wide range of insurance products to cover any need, at any stage of life, by means of a network of professional intermediaries and more than 1,500 offices.

The lines of business we offer are:

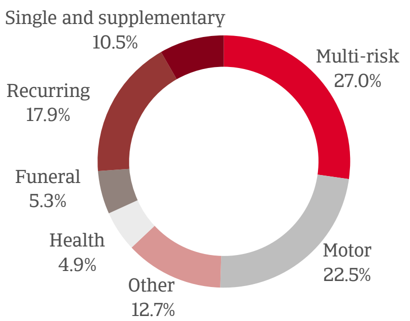
**Multi-risk**
Family-home, businesses, communities, offices and SMEs.

**Other**
Industrial products, engineering, accidents and civil liability.

**Life**
Products in life insurance, endowment, pension plans and investment funds, as well as funeral and health expenses.

**Motor**
Coverage related to cars or transport fleets.

The turnover of the traditional business amounted to 3,064.7 million euros, which represents 52.9% of the Group's total, and is distributed as follows:




In 2023, the traditional business companies, Seguros Catalana Occidente, Plus Ultra Seguros, Seguros Bilbao and GCO Reaseguros, were unified under the new Occident brand. The purpose of the unification is to simplify the organisation and, therefore, make it more streamlined and able to adapt quickly to the demands of the market. During 2024, NorteHispana Seguros will also be included.

### Credit insurance business

Through the credit insurance business, the Group offers products and services that contribute to the growth of companies throughout the world, protecting them from the risks of non-payment inherent in the sale of products and services with deferred payment. This business is structurally linked to economic development and, in particular, the evolution of non-payments and the volume of trade at the global level.

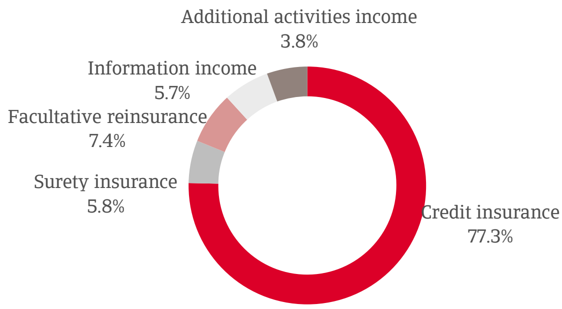
The lines of business we offer are:

**Credit insurance**
Protects against financial losses resulting from the inability of a buyer to pay for goods purchased on credit.

**Surety insurance**
Protects the beneficiary if the supplier fails to meet its contractual obligations.

**Reinsurance**
Wide range of reinsurance solutions for insurance companies.

The turnover of the credit insurance business for 2023 represents 43.2% of the Group's total, amounting to 2500.9 million euros.




The Group's brands through which it conducts its activities in the credit insurance business are Atradius and Crédito y Caución.

## Funeral business

The funeral business accompanies families before, during and after bidding farewell to their loved ones and offers a comprehensive funeral service that is centred on families.

The culture of the business is based on "people caring for people", a key concept to have a team geared towards offering the best service every day. This team comprises upwards of 1,800 professionals who blend excellent training with a vocation for service, thus contributing to the purpose of caring for all people at every step of the end-of-life process and fostering a change of mentality with regard to death.

The turnover of the funeral business amounted to 227 million euros, which represents 3.9% of the Group's total.

Within the funeral business, the Group's brands, which carry out its activity, are as follows:

mémora

ASISTEA Grupo

# Strategy and results

2-6

**GCO bases its strategy on three pillars —growth, profitability and solvency.**

**Growth**
Define the Group's target markets, develop appropriate products and services and establish appropriate distribution channels to reach the customer.

**Returns**
Recurring and sustained profitability through technical-actuarial rigour and diversification of investments and processes that allow for low cost ratios and a high-quality service.

**Solvency**
Prioritise the generation and continued growth of own resources in order to finance the expansion of the Group, ensuring a comfortable fulfilment of commitments made and an adequate return to shareholders.

In addition, the Group includes the creation of sustainable social value into its strategy, focussing its activity not only on obtaining good financial results but also on improving the well-being of each of its stakeholders, in the economic, environmental and social areas.

### Main key trends

- **Sustainable management advice.** Adapting boards of directors to integrate competencies beyond those outlined in traditional good governance frameworks. This requires, inter alia, greater insight into the organisation's impact on stakeholders, expertise in extra-financial risks, specific knowledge of ESG, leadership and oversight of sustainability issues.
- **New sustainability reporting directive**. A new regulatory framework to standardise reporting and disclosure metrics worldwide and across jurisdictions.
- **Sustainability in the supply chain**. Sustainable transformation of supply chains to consolidate ESG components within them.

## Economic, environmental and social results

| | 2022 | 2023 | 22-23 chg. |
|---|---|---|---|
| **Financial performance** *(Figures in millions of euros)* | | | |
| Turnover | 5,245.6 | 5,565.6 | 6.1% |
| Consolidated result | 542.6 | 615.5 | 13.4% |
| Attributed to the parent company | 486.6 | 551.8 | 13.4% |
| Combined ratio in traditional business | 90.8% | 92.6% | 1.8 p.p. |
| Combined ratio credit insurance business (gross) | 72.3% | 74.1% | 1.8 p.p. |
| Permanent resources at market value | 4,916.3 | 5,738.8 | 16.7% |
| Funds under management | 14,991.1 | 15,364.7 | 3.9% |
| Solvency ratio* | 247% | 232% | -15 p.p. |
| **Environmental performance** | | | |
| Paper consumption (T) | 315.6 | 227.0 | -28.1% |
| Energy consumption (GJ) | 111,000.7 | 465,218.2 | ** |
| % Renewal electricity consumption | 75.1% | 77.1% | 2 p.p. |
| Scope 1, 2 and 3 emissions generated ($TnCO_2$) | 6,183.8 | 32,814.8 | ** |
| Carbon intensity ($TnCO_2$/employees) | 0.9 | 3.7 | ** |
| **Social performance** | | | |
| Employees at close of the financial year | 7,232 | 8,858 | 22.5% |
| Average employees | 7,241 | 8,857 | 22.3% |
| Training hours | 185,820 | 205,589 | 10.6% |
| Accidents with sick leave (excl. commuting) | 79 | 53 | 49.1% |
| Social contribution (millions of euros) | 2.3 | 2.4 | 4.3% |

*2023 is estimated. Includes partial internal model.
**The change in the 2023 figures compared to 2022 is not expressed since the scope of the information differs between both years and is not comparable (in 2023 the information on the funeral business has been incorporated after the acquisition of Grupo Mémora in February of that year).

# Shareholding structure

2-1

Grupo Catalana Occidente S.A. is the holding company that operates as the parent company of the Group, whose shares are listed on the Madrid and Barcelona stock exchanges on the Continuous Market and is subject to the supervision of the Spanish National Securities Market Commission (CNMV). Similarly, as an insurance group, it is subject to the supervision of the Directorate General for Insurance and Pension Funds (DGSFP).

The main shareholder of GCO is INOC, S.A., which controls 62.03% of the Group's share capital.

Furthermore, in treasury stock, through Sociedad Gestión Catalana Occidente S.A., the Group holds 1,977,283 shares at a total acquisition cost of 22.8 million euros, representing 1.65% of the share capital.

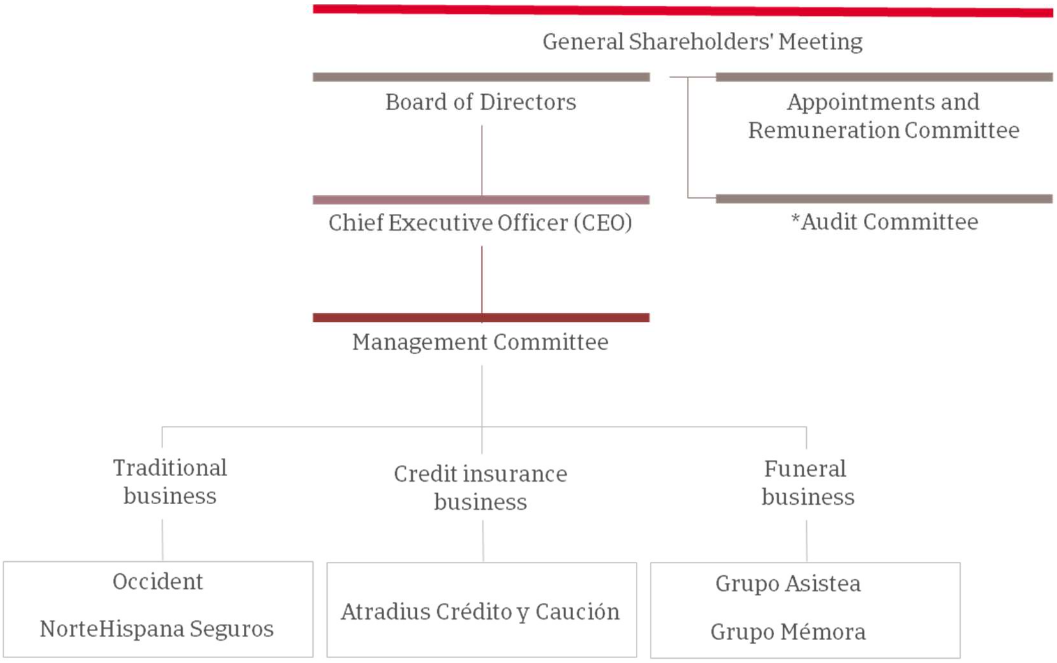
The Group's free float is 33.53%, half of which is held by institutional investors.

The Group has no information on the existence of agreements between its shareholders regarding the concerted exercise of voting rights or limiting the transfer of their shares.

# Corporate governance

2-9, 3-3

GCO's corporate governance structure suitably differentiates the functions of direction and management from the functions of supervision, control and strategic definition.




*The Audit Committee's functions include supervising that the Group's environmental, social and good governance practices are consistent with the strategy and policies approved by the Group's Board of Directors.

## Shareholders' General Meeting

The General Meeting is the representative body of the shareholders. Its functioning and activities are governed by the Articles of Association and the Regulations of the Shareholders' General Meeting. One of its core functions is to approve the annual accounts and the appropriation of profits and losses. Pursuant to the Articles of Association, there are no restrictions on voting rights and each share carries one vote.

With a view to facilitating the participation of all shareholders, GCO provides an electronic discussion forum and electronic means to enable remote voting and proxy voting. Furthermore, the Shareholders' General Meeting is streamed on the corporate website.

## Board of Directors

2-9, 3-3, 405-1

The Board of Directors is GCO's highest management and supervision body. The guiding principle of its activities is to delegate the day-to-day management to the management team and focus its activity on oversight, which includes, among others, the following responsibilities:

- Strategic responsibility: guide policies.
- Monitoring responsibility: control management.
- Communication responsibility: serve as a link to shareholders.

Its operation and actions are governed by the Articles of Association and the Regulations of the Board of Directors. In 2023, the Board of Directors met on 11 occasions, at which it reviewed, was informed and, where applicable, made decisions on the financial and non-financial situation, results, strategic plan, acquisition transactions, policies and risk control, among other matters.

| Name of Director | Position | Type of Director | First appointment date | Commissions or Committees to which they belong |
|---|---|---|---|---|
| José Mª Serra Farré | Chairman | Proprietary | 15/4/1975 | |
| Hugo Serra Calderón | Deputy Chairman-Managing Director | Executive | 27/6/2013 | |
| Raquel Cortizo Almeida | Member | Independent | 25/5/2023 | |
| Jorge Enrich Serra | Member | Proprietary | 29/4/2021 | -Appointments and Remuneration Committee (m) |
| Federico Halpern Blasco | Member | Proprietary | 25/11/1993 | |
| Álvaro Juncadella de Pallejá | Member | Proprietary | 28/4/2022 | -Audit Committee (m) |
| Beatriz Molins Domingo | Member | Independent | 28/4/2022 | -Audit Committee (m)<br>-Appointments and Remuneration Committee (m) |
| Francisco Javier Pérez Farguell | Member | Independent | 25/2/2015 | -Appointments and Remuneration Committee (c)<br>-Audit Committee (c) |
| Maria Assumpta Soler Serra | Member | Proprietary | 24/9/2009 | |
| Joaquín Guallar Pérez | Non-Director Deputy Secretary | | 25/2/2015 | |

(c) Chairman
(m) Member

**Delegated Committees of the Board of Directors**
With a view to greater efficiency in the exercise of its functions, the Board of Directors has two delegated committees: the Audit Committee and the Appointments and Remuneration Committee.

Audit Committee

The Audit Committee’s responsibilities are set out in Article 15 of the Regulations of the Board of Directors. Among other duties, this Committee is responsible for overseeing financial and non-financial risks and the effectiveness of the internal control system associated with them and ensuring that the annual accounts are prepared in accordance with regulations. It also monitors that the Group's environmental and social practices are in line with the Group's strategy and policies. Last, the Audit Committee is responsible for proposing the appointment of external account auditors.

Appointments and Remuneration Committee

The Appointments and Remuneration Committee’s responsibilities are set out in Article 16 of the Regulations of the Board of Directors. This Committee ensures, among other matters, that the processes for the selection of candidates for directors do not suffer from implicit biases that hinder the good work and diversity of the Board, submitting proposals or informing the latter, as appropriate, with total objectivity and respect for the principle of equality, taking into consideration their professional conditions, experience and knowledge. It is also tasked with reviewing GCO's remuneration policy and reporting on its implementation.

**Board diversity and experience** 2-10, 2-18, 405-1

In October 2023, the GCO Board of Directors approved a new Policy on diversity in the composition of the Board of Directors and the selection of Board members that lays down the principles, criteria and fundamental guidelines that should govern the selection process relating to the appointment and re-election of directors, pursuant to article 540.4 of the Spanish Companies Act and recommendation 14 of the Good Governance Code of Listed Companies. The principles included in the Policy include fostering diversity in the composition of the Board in terms of knowledge, experience, age and gender; non-discrimination and equal treatment in the selection process; Transparency in the process and compliance with applicable regulations.

With regard to the selection criteria, it provides that the GCO Board of Directors will regularly analyse its structure, size and composition, ensuring that proposals for the appointment or re-election of directors foster diversity on the Board. Furthermore, the Appointments and Remuneration Committee is responsible for setting a target for the representation of the under-represented sex and for drawing up guidelines on how to achieve this target.

The procedure for appointing and removing members of the Board of Directors is laid down in GCO's Board of Directors' Regulations which, together with the abovementioned GCO Board of Directors' Diversity Policy, are available on GCO's corporate website.

Additionally, the Group has the Policy on Fitness and Good Repute, which governs the requirements that must be met by the Group's strategic personnel in order to ensure that the positions are held by suitable persons. It establishes that, in terms of aptitude, it will be verified that the candidate has the appropriate training and profile to perform the functions entrusted to them, and diversity of knowledge and experience will be favoured. With regard to good repute, honesty and financial solvency will be assessed based on relevant evidence about their reputation and personal and professional conduct.

Similarly, the Group follows the recommendation included in the Code of Good Corporate Governance, which recommends that an external expert assess the operation of the Board of Directors every three years. As a result, in 2021 there was an external assessment by KPMG, in its role as independent expert, of the operation of the Group's Board of Directors, its delegate committees and the performance of its chairman. The result was positive, and the external expert highlighted the appropriateness of the procedures and the operation of these bodies. In 2023, the Board of Directors and its delegated committees have also conducted internal self-assessment processes of their operations.

With regard to its composition, it is worth highlighting that in 2023 GCO undertook changes to its Board of Directors, with which it continues to strengthen both the diversity and the skills, knowledge and experience within the Board of Directors. At the close of 2023, as a result of these changes, the Group's Board of Directors consisted of 9 directors, of which 5 are proprietary, 3 are independent and 1 is executive (in 2022, the Board of Directors consisted of 10 members, of which 4 were proprietary, 3 independent and 3 executive). The number of women on the Company's Board of Directors represents 33.3% of the total number of its members, up 13.3 points from 20% in the previous year.

| % members of the Board of Directors* | 2022 | 2023 |
|---|---|---|
| < 30 years | 0% | 0% |
| Between 30 and 50 years | 30% | 44% |
| > 50 Years | 70% | 56% |

* Including all individual members and representatives of legal entities that are members of the Board of Directors.

**Remuneration of the Board** 2-19, 2-20, 405-2

The remuneration of directors is determined pursuant to the provisions of the regulations applicable to capital companies, the Articles of Association, the Regulations of the Board of Directors and the resolutions adopted by the Shareholders' General Meeting

The General Meeting of Shareholders is responsible for approving the Directors' Remuneration Policy at least every three years, as a stand-alone item on the agenda. This policy includes the different components of the remuneration package for directors and is governed by the following general principles:

(i) Creates long-term value.
(ii) Rewards the achievement of results based on a prudent and responsible assumption of risks.
(iii) Attracts and retains the best professionals.
(iv) Rewards levels of responsibility and professional careers.
(v) Strives to ensure internal fairness and external competitiveness.

The Remuneration Policy is consistent with ESG issues, linking variable remuneration to commitments acquired with regard to sustainability, and stipulating that the weight of non-financial criteria may not be less than 25% of the total.

Detailed information on the application of the Directors' Remuneration Policy is included in the Annual Report on Directors' Remuneration, provided to the CNMV in the Directors' Report and available on the Group's corporate website: **www.gco.com**.

The total remuneration of the Company's directors in 2023 was as follows:

| **Remuneration of directors*** (Figure in thousands of euros) | 2022 | 2023 |
|---|---|---|
| Average non-executive directors men** | 178.5 | 315,8 |
| Average non-executive directors women | 225.7 | 197,6 |
| Average executive directors men*** | 1,078.3 | 1.237,3 |
| Total remuneration of directors | 5,682.2 | 3.725,0 |

*This includes the remuneration of executive and non-executive directors of GCO both in the Company and in the other Group companies.
**The increase in the average remuneration is due to the resignation of the Executive Chairman on 27 July 2023 and his appointment as a non-executive director.
***Corresponds to the sole executive director of the Company. Information on the average number of female executive directors is not included, since this position is not held by a female executive director.

This item includes fixed and variable remuneration, contributions to social welfare plans, per diems, statutory benefits and others.

## Management Committee

GCO has a Management Committee, composed of the main executives of the parent company and its most representative subsidiaries, leads and coordinates the day-to-day management of the Group, by delegation of the Board of Directors.

In addition, the main insurance companies forming part of the Group have their own Management Committees. These committees meet at least once a month, to take actions relating to their operational follow-up.

## Senior Management

Grupo Catalana Occidente S.A., as a listed company and parent company of the Group, has a Senior Management comprising those executives who report directly to the Board of Directors or the chief executive of the company and, in any case, the internal auditor. The proportion of women in the Senior Management of Grupo Catalana Occidente S.A. in 2023 is 40%.

For further information, see the 2023 Annual Corporate Governance Report, available on the GCO website.

# Risk management

2-6, 2-12, 2-16, 2-23, 3-3

## Risk management control system

The Group's risk management control system is based on the "three lines of defence" principle.

**1st Line – Taking and managing risks**
Made up by the business units, which are responsible for the assumed risk and its management.

**2nd Line – Control and monitoring**
It comprises the risk management control function, the compliance function and the actuarial function. Its aim is to define controls that guarantee compliance with risk management processes and policies.

**3rd Line – Internal audit function**
The internal audit function is tasked with making an independent assessment of the effectiveness of the governance system, the risk management control system and internal control.

The risk management control area handles all significant aspects of risk management, laying down guidelines and benchmarks which are adopted by the entities, with any necessary adaptations.

## Risk strategy

GCO establishes its risk strategy as the level of risk that its constituent entities are willing to assume and ensures that the integration of this strategy into the business plan enables it to fulfil the risk appetite approved by the Board of Directors.

GCO has outlined the following risk management concepts:

- **Risk profile**: risk assumed in terms of solvency.
- **Risk appetite**: risk in terms of solvency that the entities forming the Group plan to accept in order to achieve their objectives.
- **Risk tolerance**: maximum deviation from the appetite that an entity is willing to assume (tolerate).
- **Risk limits**: operating limits established to comply with the risk strategy.
- **Warning indicators**: GCO also has a series of early warning indicators that serve as a basis both for monitoring risks and for compliance with the risk appetite approved by the Board of Directors.

## Information and communication

The governing bodies receive at least quarterly information on the quantification of the main risks to which the Group is exposed and the capital resources available to deal with them, as well as information regarding the fulfilment of the limits established in the risk appetite.

Since 2016 and on a yearly basis, the Group and the insurance companies that comprise it publish a specific Solvency and Financial Condition Report (SFCR) where the risks to which they are exposed are listed and quantified. This report can be found on the corporate website.

## Own Risk and Solvency Assessment

The Own Risk and Solvency Assessment (ORSA) is the process that is at the heart of the risk management control system. Its objective is to identify, assess, monitor, manage and disclose the Group's short and long-term risks.

The ORSA is performed at least once a year and assesses:

- Meeting of the capital requirements.
- Deviation between the risk and solvency profiles.
- Meeting of the capital requirements in stress situations.

The Group conducts a back-testing analysis between the capital requirement estimates of the ORSA exercise and its year-end results.

## ESG (Environmental, Social and Governance) risks

3-3, 201-2

ESG risks are defined as those environmental, social or governance events or factors that, were they to occur, could affect the organisation or have a material negative impact on the achievement of its strategic objectives. These risks can also be an important area of opportunity to the degree that the organisation increases its adaptability to the changes produced by these to counteract their effects.

GCO understands, prevents and seeks to mitigate ESG risks, and to best manage the opportunities to provide all its stakeholders with secure, high-quality protection against such risks.

Furthermore, as these risks can directly or indirectly affect the Group as a whole, they are integrated transversally in the risk policies.

Their management, measurement and monitoring are outlined in the Sustainability Policy and the Climate Change and Environment Policy, as well as in the rest of the Group's governance policies, according to which:

- The impacts of these risks, to the extent that they are relevant, are analysed in the financial planning in order to adapt the strategic planning, if necessary, taking into account the risks identified.
- It implements the metrics necessary that help to measure and manage risks and opportunities derived from climate change.
- It performs regular reporting, at the highest level, on the identification of these risks and their impact on business.

GCO also has processes and controls in place to identify the principal environmental, social and governance risks to which it is exposed and to assess their impact in the short, medium and long term.

Lastly, it has a System of Internal Control over Non-Financial Reporting (SCIINF) which, by developing a set of processes and controls, ensures the reliability of sustainability information.

In the following page we describe the main ESG risks identified by the Group, classified according to their type, establishing their impact and time horizon.

## ESG risk map

201-2

| Type | | ESG risk | Impact | Time horizon* |
|---|---|---|---|---|
| Environmental | Physical | Increased claims ratio due to the increased frequency and severity of the physical impacts of adverse weather events | High | Long |
| | | Increased mortality due to exposure to areas with extreme weather events (heatwaves, extreme rainfall, etc.) | Medium | Long |
| | | Increased risk of non-payment of reinsurers due to greater exposure for them, derived from the increased claims ratio that could be caused by an increase in the frequency and severity of extreme weather events | Medium | Long |
| | Transition | Increased claims ratio in the credit insurance business for buyers with high exposure to climate transition and/or climate change | High | Medium |
| | | Decrease in the credit insurance business in buyers with high exposure to climate transition and/or climate change | High | Medium |
| | | Loss of value of shares in sectors with a high exposure to the climate transition | High | Long |
| | | Increase in credit spreads in sectors with high exposure to climate transition | High | Long |
| | | Increase in the risk of non-payment of reinsurers due to their exposure to sectors with a higher probability of default due to the transition to low-carbon economies | Medium | Medium |
| | | Risk of a drop in the Non-Life or Savings portfolio due to exposure to highly polluting sectors affected by the transition to a low-carbon economy | Low | Medium |
| | | Risk of not having our buildings adapted to the legal requirements of zero consumption properties | Low | Medium |
| | Liability | Risks derived from legal or regulatory breaches in environmental matters | Medium | Short |
| Social | | Social risk derived from a breach of Human Rights (breach of the commitments in relation to diversity, equality, inclusion, etc.) | Low | Short |
| | | Social risk associated with changes in people management in the company | Medium | Medium |
| | | Social risk related to the impact of demographic and social changes that causes an economic loss in the different lines | Low | Medium |
| | | Changes in the longevity trends in the population | Low | Medium |
| | | Changes in the health trends of the various groups of population | Low | Long |
| Governance | | Negative perception of rating agencies with regard to the company's ESG commitment | High | Short |
| | | Governance risk arising from poor protection of personal data | Medium | Short |
| | | Governance risk related to the production of responsible products determined by the applicable legislation | Medium | Medium |
| | | Governance risk related to not adapting to the new trends in innovation and digital transformation | Medium | Medium |
| | | Cyber risks and/or not having our computer systems adapted to new labour and market trends: remote working, IT security, digitalisation, online customer service | Medium | Short |
| | | Risk arising from the inefficiency of the governance system related to ESG aspects | Low | Short |
| | | Risk derived from the composition of the Corporate Governance | Low | Short |
| | | Ethics and integrity risk related to the Code of Ethics, compliance and corruption | Low | Short |
| | | Risk related to the tax strategy and transparency | Low | Short |
| | | Risks arising from legal or regulatory non-compliance related to ESG factors or disclosure of ESG information (breach of money laundering regulations, breach of data protection regulations) | Low | Short |
| | | Reputational risk due to loss of image in the media or on the social media, on not being considered to be an agent contributing to the ESG factors | Low | Medium |
| | | Risk of negative customer perception derived from transparency (products, company information, etc.) | Low | Medium |

Time horizon of the ESG risk map: Less than 5 years (s/t), between 5 and 10 years (m/t), more than 10 years (l/t).

# 02.

# Sustainable business

# Sustainability Governance

2-9, 2-12, 2-13, 2-14, 2-17

Sustainability is fostered by the Group's senior management, with the GCO Board of Directors responsible for setting and guiding the sustainability strategy, which acts transversally and impacts all areas of business. Additionally, there are three bodies responsible for supervising sustainability within the Group: Sustainability Committee, Audit Committee and Compliance Verification Committee.

The Sustainability Report includes the Non-Financial Information Statement and is approved by the GCO Board of Directors. Furthermore, the latter is submitted for review and approval by the General Meeting of Shareholders as required by Law 11/2018, where shareholders have the opportunity to express their opinion on the initiatives and performance described.


(*) Depending on the needs of the Sustainability Committee, other areas of interest may attend, such as Fundación Occident, Real Estate Assets, Marketing and Communication, Operations or Actuarial Function, among others.

## Sustainability Committee

It has the delegated function of deciding and supervising the Group's actions in relation to sustainability issues, including the Sustainability Master Plan and its corresponding regular updates. This Committee is chaired by the Financial – Risk General Management of GCO and comprises the heads of the various areas and companies of the Group, who represent the stakeholders.

Additionally, Atradius has its own Sustainability Committee chaired by the CFO of Atradius and comprising managers from all the areas involved. This Committee meets every 4-6 weeks and acts as a link between Atradius and the GCO Sustainability Committee. Its functions include implementing the Group's ESG strategy in Atradius and putting into practice the sustainability goals set for the credit insurance business.

The Sustainability area, which is part of GCO's Finance-Risk Management within the Investor Relations, Rating and Sustainability department, organises and fosters the initiatives and commitments of the Sustainability Master Plan, reporting to the Sustainability Committee. Its objective is to maximise the ESG impact of the Group with all its stakeholders and raise awareness about the leadership of the organisation in non-financial questions.

**In 2023, the GCO Sustainability Committee met on 2 occasions and discussed, among others, the following issues:**

- Monitoring and analysis of the progress made in 2023 in the 2021-2023 Sustainability Master Plan.
- Approval of the new materiality of GCO (double materiality)
- Proposal and approval of the new GCO 2024-2026 Sustainability Master Plan.
- Supervision of the non-financial information included in the Sustainability Report –Non-Financial Information Statement.
- Analysis of the reports of analysts and ESG rating agencies.
- Progress in the climate change strategy.
- Review of sustainability-related policies.
- Monitoring and analysis of new European and national sustainability regulations (Taxonomy Regulation, Disclosure Regulation or SFDR, Climate Change and Energy Transition Act and Corporate Sustainability Reporting Directive – CSRD, among others).

### Audit Committee

The responsibilities assigned to the Audit Committee and set out in the Board of Directors' Regulations include monitoring sustainability strategy and practices and assessing their degree of compliance.

### Compliance Verification Committee

It is responsible for assessing, advising and reporting on everything related to verifying compliance with the applicable legal obligations, and those voluntarily assumed, as well as the impact of any modification of the legal environment and compliance risk, including those relating to sustainability.

# Sustainability strategy

3-3

For GCO, sustainability means voluntary commitment to integrate risks into its strategy, together with responsible management of financial matters and social and environmental aspects, promoting ethical behaviour with its stakeholders, rigorously applying the principles of good governance and contributing to the well-being of society through the creation of sustainable value.

Sustainable value is the result of not only focusing activity on obtaining good financial results, but also promoting the well-being of the stakeholders to which the Group's entities must be accountable. This value becomes sustainable when it is integrated into the business strategy both in the short term and also in the medium and long term. This commitment is embodied through our Sustainability Policy and the 2021-2023 Sustainability Master Plan.

### Sustainability policy

The Sustainability Policy outlines the framework for GCO and its constituent entities to foster and enhance sustainable behaviour. It includes the general working principles in terms of sustainability, and the specific sustainability targets pursued by the Group.

This Sustainability Policy is intended to respond to an increasingly demanding European and national regulatory framework, including the UN's 2030 Agenda, the Paris Agreement of the UN Framework Convention on Climate Change, the European Green Pact, the European Decarbonisation Strategy for 2050 and Law 7/2021 on Climate Change and Energy Transition.

Externally, it strengthens the commitment to the principles of the United National Global Compact, the United Nations Principles for Responsible Investment (PRI), the Principles for Sustainable Insurance (PSI) and the Sustainable Development Goals (SDGs). Internally, it is the key tool for strengthening the Group's commitment to sustainability and lays the foundations on which to develop the Sustainability Master Plan.

### External sustainability rating

GCO's exposure to and management of ESG (Environmental, Social and Governance) risk is assessed by the rating agency Sustainalytics.

In December 2023, the agency reviewed the Group's ESG rating, giving it a score of 16.9 points. The agency therefore considers that the organisation has a **low risk of experiencing material financial impacts related to ESG factors** and places **GCO among the top 30 companies with the best ESG rating in the insurance sector**, which includes more than 300 companies.

Similarly, **GCO has been included in the new IBEX ESG Index**, which recognises it as one of the companies with the best performance in environmental, social and governance aspects. The IBEX ESG Index pursues sustainability goals in terms of fostering the development of sustainable practices in listed Spanish companies. Sustainability factors are measured using a metric provided by Inrate.

# Materiality and relationship with the stakeholders

## Double Materiality

3-1, 3-2, 3-3

**In 2023, GCO has updated its materiality analysis with the aim of identifying relevant issues for the Group and its stakeholders.**

This materiality analysis has been conducted pursuant to the **dual approach** promoted by the Corporate Sustainability Reporting Directive (CSRD), considering impact materiality, which analyses the impact of the organisation on the environment and people, and financial materiality, which considers the impact of ESG issues on the business. To carry out the double materiality analysis, the Group has undertaken the following process:

### 1. Identification of ESG sources

An analysis of internal and external context information has been undertaken to identify expectations and requirements regarding sustainability on the part of GCO's main stakeholders. In that regard, the analysis has taken into account the materiality analysis of other companies in the sector, sustainability regulations (CSRD, CS3D, EU Taxonomy and SFDR), analysts and ESG rating agencies (MSCI, Dow Jones, FTSE, Sustainalytics) and standards, voluntary initiatives and best practices (UN PRI, PSI, SASB). Drawing from this analysis, 20 issues of concern to GCO's stakeholders were preliminarily identified.

### 2. Impact materiality assessment

For each of the preliminary topics, the assessment has identified positive and negative impacts that the organisation generates or could generate on people and the environment. Once the impacts were identified, they were assessed for severity (scale, remediability and scope) and likelihood (occurrence and time horizon). Key areas of the organisation, external and internal stakeholders and experts from the insurance sector were taken into consideration for the assessment.

### 3. Financial materiality assessment

For each of the preliminary issues, the assessment identified whether there were circumstances that could give rise to risks or opportunities in the value of the company, considered over various time horizons and understood as impacts on assets, liabilities or cash flows (present or future). Once the risks and opportunities of each issue had been identified, they were internally assessed by magnitude and probability (occurrence and time horizon).

### 4. Prioritisation of material topics

Once both impact and financial materiality had been assessed, a subsequent prioritisation of the material topics identified was undertaken. This assessment used the methodology established by EFRAG to develop the ESRS of the CSRD.

## Material topics for GCO

2-29

| | Material Topic | CSRD Relationship |
|---|---|---|
| **1** | Climate Change | ESRS E1 |
| **2** | Working Conditions | ESRS S1 |
| **3** | Talent management, professional development and training | ESRS S1 |
| **4** | Employee health and well-being | ESRS S1<br>ESRS S2 |
| **5** | Ethics and business conduct | ESRS G1 |
| **6** | Responsible management of products and services | **GCO** |
| **7** | Service quality and customer satisfaction | ESRS S4 |
| **8** | Diversity, equality and inclusion | ESRS S1<br>ESRS S2<br>ESRS S4 |
| **9** | Supplier relationship management | ESRS S2 |
| **10** | Data privacy | ESRS S1<br>ESRS S2<br>ESRS S4 |
| **11** | Sustainable investment | **GCO** |
| **12** | Cybersecurity | ESRS S1<br>ESRS S2<br>ESRS S4 |
| **13** | Responsible governance | ESRS G1 |
| **14** | Contribution to society and local communities | ESRS S3 |

The most material environmental, social and governance topics are Climate Change, Working Conditions and Ethics and Business Conduct, respectively.

Issues such as financial inclusion, circular economy, pollution, biodiversity and ecosystems, water and marine resources and fiscal responsibility are topics that have been assessed but which have not proven to be material.

With the new materiality, the number of material topics has been cut from 16 (2021-2023) to 14 (2024-2026) due to the following changes:

- Elimination of the material topics "ESG risk management", "Human rights" and "Innovation", since they are cross-cutting issues already included in each of the different material topics identified.
- Unification of the topics "Engagement with society" and "Development of local communities" into one material topic ("Contribution to society and local communities").
- Identification of "Diversity, equality and inclusion" as a new material topic for GCO.
- Separation of the topic "Data protection and cybersecurity" into two separate topics "Data privacy" and "Cybersecurity".

The full double materiality analysis exercise will be conducted every 3 years, coinciding with the update of GCO's Sustainability Master Plan. However, a review of the risks and opportunities assessed in the financial materiality will be undertaken on a yearly basis in order to identify possible changes that have occurred in the probability of their occurrence.

## Relationship with the stakeholders

3-3, 2-29

GCO has identified six stakeholder groups based on the impact its operations have on them and the relevance of each one to the Group.

The Group makes a commitment to each of them, which involves ongoing and transparent dialogue to understand them and integrate them into the Group's activities. To do this, there are various communication channels through which a smooth, close and transparent relationship is maintained with the stakeholders. Additionally, the various channels allow the Group to identify the needs and expectations of all of them and, in this way, applying the principle of transparency included in the Code of Ethics, be able to respond to them.

Contact and interaction with stakeholders is conducted through multiple channels such as the corporate website of the Group and its Foundation (Fundación Occident), the Foundation's social programmes, social networks, the whistleblowing channel, as well as through the media.

Similarly, through the participation of GCO members in various presentations, round tables, forums and conferences, outreach activities are conducted in the area of sustainability, with the goal of promoting awareness among stakeholders.

**Communication, participation and dialogue channels** 2-29

**Employees**

The Group has channels for communication and dialogue with its employees, both directly and also through their union representatives on the corresponding negotiating boards when dealing with topics of interest and reaching agreements on them. The main channels for communicating with them are the intranet, notice boards and suggestion boxes, newsletters, employee satisfaction surveys, in-person meetings, events and the whistleblowing channel.

**Customers**

The Group maintains ongoing dialogue with this stakeholder group through its extensive commercial network, technical assistance services, customer care and defence services and its own network of branches. In addition, there are other communication channels such as the corporate website, the whistleblowing channel, the e-Customer service, the social networks, the customer satisfaction surveys and the corporate magazines.

**Shareholders and Investors**

The group is in constant communication and dialogue with this stakeholder group. The Analyst and Investor Relations, Rating Agencies and Sustainability department conducts and leads roadshows with investors, responding to their requests for information. There are also other channels of communication such as the General Meeting of Shareholders, the corporate website, the analysts and investors area, the shareholder service area and the whistleblowing channel.

**Distributors/Intermediaries**

The Group is in constant communication with the insurance agents and brokers through its internal portal. It also has other channels of communication such as commercial and training sessions, the whistleblowing channel, the corporate app and social networks.

**Associates/Suppliers**

The Group has a good relationship with this stakeholder group during the entire management process, from the taking out of contracts to the provision of the service. For this reason, the Group makes available to associates and suppliers various communication channels such as the Intranet, satisfaction surveys and the whistleblowing channel.

**Society**

This stakeholder group includes the local communities, unions, NGOs, academic sector, civil society and the public in general.

# Sustainability Master Plan

2-24, 3-3

The Sustainability Master Plan (SMP) is the principal instrument through which GCO develops and implements its sustainability strategy. Each corporate area represented in the Sustainability Committee has its own managers for promoting and monitoring the specific initiatives established in the PDS. These managers, together with the Group's Sustainability Area, meet in the Sustainability Committee to coordinate the strategy and analyse the most important projects in this field. There are also sustainability interlocutors in the traditional insurance and credit insurance business, as well as in the funeral business, which provide greater knowledge of the countries in which we work and greater coordination in the implementation of initiatives.

## Main progress of the year in the 2021-2023 SMP by line of action

**Details of the progress made in the 2023 Sustainability Master Plan by line of work:**

**Environmental management**. An Environmental Management System has been implemented in the Group's main buildings aligned with ISO 14001. Additionally, with a view to contributing to protecting the environment, initiatives and projects have been developed to minimise environmental impacts, such as World Cleanup Day and the forestry management project developed through Nactiva Capital Natural S.L.

**ESG risk management**. Besides integrating ESG risks alongside the traditional risks of the insurance business by including them in the Group's risk map, in 2023 further progress was made in conducting a materiality analysis of the climate impact on the main properties owned by the Group.

**Sustainable investments**. The Group's sustainable investment strategy includes a new positive screening criterion, which excludes investment in companies with a worse management of ESG risks. In addition, new environmental economic sectors have been brought into the negative screening, excluding investment (thermal coal, oil and gas exploration in the Arctic and shale energy).

**Responsible products**. Pension fund product offerings have been brought into line with the Article 8 category of the SFDR, now explicitly incorporating environmental and/or social considerations in their management, beyond merely integrating sustainability risks.

**Innovation**. Through Xplora, the Group's intrapreneurship programme, the Group continued to foster innovation, knowledge and analysis of the trends that will shape the future of the insurance sector.

**Digitisation and omni-channelling.** The Group has driven the digitisation of customer and collaborator documentation. We also continued to develop digital solutions for customers (new Digital Health app) and intermediaries (inclusion of new functionalities in the Gestiona app using artificial intelligence).

**Communication and relationship with stakeholders**. Interviews have been conducted with GCO's main stakeholders to understand their concerns, which have been used as a basis for developing the new 2024-2026 Sustainability Master Plan.

**Ethics and integrity**. A new Board Diversity and Director Selection Policy has been published, setting out the principles and criteria that should govern the selection process of the Group's directors, and establishing commitments regarding their composition in relation to the under-represented gender.

**Employee experience**: Compulsory training on sustainability has been given for all the Group's employees. An AI-based chatbot has been implemented that provides employees with quick and accurate answers to a wide range of queries.

**Formalising investment in society.** Fundación Occident has continued to develop social and environmental action projects. The Group's employees have also been involved in various volunteer initiatives, organised by the Group, for the benefit of society and the planet.

## New 2024-2026 Sustainability Master Plan

2-24, 3-3

**Based on the double materiality analysis, the Group has been able to identify the sustainability issues that are most important to its stakeholders, which has enabled it to design the new Sustainability Master Plan for the period 2024-2026.**

The 2024-2026 Sustainability Master Plan is structured into 4 pillars on which 10 strategic lines have been defined in which the Group wishes to create value. Based on these, 22 goals to be achieved and 44 actions necessary to achieve them have been set. Below are some of the most important initiatives:

### 2024-2026 SUSTAINABILITY MASTER PLAN

**Good governance**

Strengthening sustainability in governance

- Increasing the presence of the least represented sex on the GCO Board of Directors, complying with European and national regulations.
- Linking the proportion of variable remuneration that depends on non-financial criteria to the fulfilment of specific sustainability goals and metrics.

Improving the ESG management of the value chain

- Designing a due diligence system in human rights and the environment.
- Training employees for responsible marketing of products and services.

**Sustainable business**

- Establishing environmental commitments in subscription.
- Expanding the number of sustainable solutions offered to customers.
- Developing sustainable claims management through a "zero paper" strategy and fostering the use of sustainable repairs.
- Having sustainable funeral services and facilities.

**Social commitment**

- Documenting the Group's diversity and equality commitments in its own policy.
- Reducing the wage gap for all levels of the organisation.
- Boosting the presence of women in middle management and managers.
- Offering ongoing training to employees that contributes to the efficient use of technology and the agenda and the cohesion of the team.
- Increasing the budget for social action projects annually.

**Environmental Liability**

- Expanding the Scope 3 emissions categories reported.
- 100% Of electricity consumption in Spain and Portugal from clean energy.
- Reducing energy consumption by installing solar panels and using efficient lighting.
- Outlining the goals of decarbonisation for the underwriting and investment portfolio, and for the Group's operations.
- Implementing the recommendations for disseminating biodiversity of the Taskforce on Nature-related Financial Disclosures (TNFD).

A strategic line of **reporting and transparency** is set up transversally to the four pillars, focused on increasing the internal control of non-financial information and improving the Group's content related to sustainability.

# Sustainable investment

3-3, 203-2

## Governance of sustainable investment

GCO's Sustainable Investment Policy, approved by GCO's Board of Directors, outlines the ESG principles and criteria to be taken into account by the Group in the management of its financial investments and is complementary to the investment management principles established in the Group, which are based on the principle of prudence in its activities and whose main objective is to ensure the commitments made to its customers over time, with an adequate diversification of portfolios.

Additionally, the Group has an Annual Sustainable Investment Plan which lays down the sustainable investment goals to be achieved during each year in line with the principles set out in the Sustainable Investment Policy.

Furthermore, with a view to complying with the obligations of Regulation (EU) 2019/2088 on sustainability disclosures in the financial services sector (SFDR), the Group discloses specific information on how sustainability risks are taken into consideration in the investment decision-making process and how its investments are affected by environmental, social and governance factors (main adverse impacts).

All of the above information is available on the Group's corporate website, within the Sustainability section.

The Corporate Financial Investments Area is responsible for ensuring that the established sustainable investment principles are met in the organisation. At least 14 people from the Financial Investments team are directly involved in the implementation and compliance with the criteria and objectives established in GCO's Sustainable Investment Policy.

This area is also responsible for reporting periodically to the Sustainable Investment (SI) Committee. This Committee, which reports to the Group's Investment Committee, is tasked with assessing and monitoring the implementation of the Group's Sustainable Investment Policy and the implementation of the Annual Plan. The agreements taken by the SI Committee and approved by the Investment Committee are reported to the Group's Management Committee, and subsequently reported to the Sustainability Committee on any issues deemed relevant.

## Sustainable investment strategy

As a subscriber to the United Nations Principles for Responsible Investment (UN PRI), GCO has joined the commitment to achieving a global and sustainable financial system through the incorporation of environmental, social and corporate governance (ESG) issues into its investment strategy and in the active exercise of the property.

To achieve this, the Group incorporates ESG issues into its investment analysis and decision-making processes on the basis of the following principles:

**Exclusion principles:**

- Negative screening according to the sector activity: Investment in companies in which part of their activity is carried out in certain excluded economic sectors is excluded (e.g. Thermal coal, Arctic oil and gas exploration and shale energy, production or marketing of landmines, etc.).
- Regulatory screening: Investment in companies whose performance is considered controversial and, in particular, that could adversely affect their operations, the environment or society in general is excluded.
- Positive screening*:* Investment in companies with poorer ESG risk management, as measured by a risk rating given to companies by an external provider, is excluded.

**Integration principles:**

- Sustainable investments: Investment in projects aimed at the transition towards a low-carbon economy, which is more resource-efficient and more sustainable, are progressively increased.
- Investments with impact: investment in projects aimed at achieving the social and environmental objectives, will be gradually increased, all in line with the priorities set out in the Group's Sustainability Master Plan.

For the implementation of these principles, the Group has tools from external suppliers that allow it to establish different criteria for the selection of investments, as well as to track the evolution of the companies in relation to the integration of the ESG criteria in the performance of their activity.

**Sustainable investment in real estate**

In recent years, GCO's real estate investment management area has focused on investing in properties deemed sustainable from an environmental standpoint. In particular, the pre-investment assessment takes into consideration aspects such as energy certification, the existence of facilities to reduce water consumption, centralised waste collection points, as well as any other possible improvements that could be made in that regard.

All of GCO's real estate investments in unique buildings are in line with the Group's Sustainability Policy, which means that it **only invests in buildings with LEED Gold certification or higher, and/or BREEAM Very Good or higher**. These international standards in sustainable construction and management guarantee the Group's compliance with the environmental requirements it has set out to achieve.

## Sustainable investment metrics and targets

**In 2023, GCO exceeded its sustainable investment target of 10%, set for this year in the Annual Sustainable Investment Plan.**

As of 31 December 2023, and pursuant to the Group's Sustainable Investment Policy, the value of the Group's sustainable investments as a proportion of total investments and funds under management represents 54% (51% in 2022).

GCO's sustainability-related investment commitments are included in the Annual Sustainable Investment Plan. These include commitments related to the fight to combat climate change, such as not investing in companies where more than 10% of their turnover is related to:

- The extraction or generation of energy from thermal coal
- Oil and/or gas exploration in the Arctic offshore regions
- Shale energy extraction

Additionally, within the goals of the 2024-2026 Sustainability Master Plan, a target has been set to measure Scope 3 emissions associated with investments, in order to set decarbonisation targets and drive decision-making.

For further details on sustainable investment commitments see GCO's Annual Sustainable Investment Plan at **www.gco.com/inversion-sostenible.**

## Asset eligibility and alignment according to the EU Taxonomy

As part of the EU Sustainable Finance Plan, the European Commission has brought in the European Taxonomy Regulation 2020/852, which determines which economic activities are environmentally sustainable.

GCO, as a financial sector entity and insurance group, is an entity subject to the obligations of this Regulation and must report to the market eligibility and alignment indicators relating to its non-life underwriting activities and on-balance sheet assets.

The main alignment KPI's of GCO's assets according to the Taxonomy as of 31 December 2023 has resulted as follows:

- Turnover-based: 3.39% aligned investments in financial and non-financial undertakings and real estate assets over total covered assets.
- CapEx-based: 4.11% aligned investments in financial and non-financial undertakings and real estate assets over total covered assets.

For further information on the calculation methodology and breakdown of data under Annexes IX, X, XI and XII of the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 see Appendix I of this report.

Information on the eligibility and alignment of the Group's non-life underwriting business can be found in the "Responsible Products" section.

# Responsible products

3-3

**100% of GCO's investment funds, unit linked products and pension plans/EPSVs are classified as Article 8 according to the SFDR.**

GCO understands that developing innovative and sustainable solutions sensitive to changing consumption patterns and fostering the implementation of new technologies and energy sources represents a competitive advantage and the opportunity to better adapt to the changing needs of its customers. As such, it offers solutions that incorporate customer preferences and contribute to promoting sustainability.

## Insurance business

| Responsible products | | 2023 |
|---|---|---|
| Sustainable investment funds (Article 8 SFDR) | Policies | 7,823 |
| | Assets Under Management (AUM) | €807.3 m |
| Sustainable pension funds and EPSVs (Article 8 SFDR) | Policies | 57,565 |
| | Assets Under Management (AUM) | €707.8 m |
| Other products with sustainable connotations * | Policies | 18,642 |
| | Premiums | €701.2 m |

*Included insurances are personal mobility, cyber risks, environmental risks, electric vehicles, Senior health and wellness and Agricultural.

### Financial products that promote environmental and/or social characteristics (Article 8 of SFDR)

GCO has adapted its investment fund product offering to the Article 8 category of the SFDR. Thus, the Group's range of investment funds explicitly includes environmental and/or social considerations in their management, beyond merely integrating sustainability risks. Information is given in both the pre-contractual documentation for the product and the regular reports on how these sustainability characteristics are integrated with the aim of making it easier for customers to identify these products.

Similarly, as of 1 October 2023, the Group has adapted the investment policy of its unit linked products and pension funds/EPSVs to foster environmental and social principles pursuant to Article 8 of the SFDR.

### Personal mobility insurance

In recent years, due to the increased concern about the environment and seeking sustainable solutions, the big cities have promoted changes to reduce the use of private vehicles. These changes, coupled with population growth, the high density of cities and increased travel, have led to a paradigm shift in transport and the emergence of a new mobility.

"Personal Mobility" is a comprehensive mobility insurance product that ensures the user has all risks covered in their journeys, regardless of the method of transport used (such as rental and sharing vehicles, scooters, city bikes, taxis, vehicles for hire or public transport). With that, the Group is helping to mitigate the environmental and social problems associated with urban mobility, focussing on sustainable mobility.

### Cyber-insurance

The digital transformation poses new problems and needs that affect our customers. Both companies and individuals are increasingly exposed to a higher risk of cyberattacks that can jeopardise important aspects such as: Data storage and processing in an ethical and secure manner, physical and reputational integrity, harassment by social networks, etc. GCO responds to these needs by offering its customers protection against the risks involved in operating in an increasingly digital era. To this end, the Group has a cyber-insurance for companies that provides, among other aspects, protection against cyber-attacks, preventive services and professional advice. In addition, it has a cyber insurance policy for individuals that provides a package of coverage options and services to meet the needs of our individual customers. This product for individuals was made available for sale in 2022.

### Environmental risk insurance

The Group participates, together with other companies in the sector, in the environmental risk pool. This pool is an effective incentive to prevent these risks since, due to the lack of sufficient development of this type of insurance on an individual basis in the Spanish market and the high level of specialisation required. The coverages given through environmental liability insurances enable to deal with the costs arising from the necessary repair of the environment that has been damaged due to a contamination event. In its environmental insurance offer, the Group provides this cover to companies, boats, residential buildings and single-family dwellings.

**Electric vehicle insurance**

The transformation of carbon-based economies for new paradigms of sustainability, where energy efficiency and environmental protection play an essential role, is already one of the world's main priorities. Organisations that gradually adapt their offer to cover this energy transition will open new markets and will be better prepared for the future.

The car insurance offer includes a specific insurance package for electric and plug-in hybrid vehicles, which are committed to sustainability by mitigating the carbon footprint.

**Financial inclusion products**

In the insurance sector, the basis of financial inclusion is to ensure access to protection against certain risks for vulnerable groups.

These groups include people over 65 years of age, whose public pension is sometimes insufficient to cover their regular expenses, and rural producers, who are more vulnerable to various types of risks, with low population density and reduced income levels. GCO is aware of this and has products adapted to suit the needs of these groups:

- **Senior Well-being Health** is a medical insurance for the elderly designed to meet all the health needs that arise at this stage of life at more affordable prices. It offers, among other services, preferential care lines, home care medical staff, home care staff (cleaning, personal assistance, purchase of medicines, etc.) and a medical directory adapted to suit their needs.
- **Lifetime reverse mortgage** is a product for retired people that lets them liquidate their property wealth and receive a monthly annuity for life, while retaining the use and ownership of the home.
- **Agricultural Insurance** guarantees the income and continuity of agricultural and livestock farms, which form part of the fundamental activity for the rural environment, covering the damage they may suffer in the event of fire, loss of crops, animal disease, adverse weather, etc.

## Funeral business

**Sustainable coffins**

With respect for biodiversity and forest conservation, GCO's funeral business is committed to using ECO-certified coffins, ensuring that the raw material for these products is sourced from controlled felling and subsequent reforestation.

| | 2023 |
|---|---|
| Coffins with ECO certificate supplied | 38,453 |
| % coffins with ECO certificate out of total coffins supplied | 69.7% |

**Oxo-biodegradable shrouds**

Oxo-biodegradable shrouds are used in funeral services. They are known for their ability to decompose in any environment, as long as oxygen is present, even in the absence of water, thus reducing the environmental impact.

**Ecofunerals**

GCO's funeral companies offer ecological funeral services, in order to reduce the impact of the funeral process on nature. The purpose of this product is to respond to the growing social interest in sustainability and respect for the environment.

Ecofunerals cut greenhouse gas emissions by more than 30% and reduce the emission of dioxins that are toxic to health.

This product is also committed to using environmentally managed mortuaries, using flowers from organic crops, memorials made from FSC or recycled paper, and transporting the deceased in electric or hybrid vehicles.

**Financially inclusive funeral services**

GCO's funeral companies support families without resources so that they can provide a funeral service free of charge, or on a subsidised basis, through the protocol of agreements with municipal and regional social services. This contributes to meeting a real need and not excluding any family from funeral services.

## Sustainability in underwriting

As a signatory to the Principles for Sustainable Insurance (PSI) developed by the United Nations Environment Programme Finance Initiative (UNEPFI), GCO is committed to integrating environmental, social and governance (ESG) issues into its decision-making processes.

In 2023, **the Group's commitments have been further strengthened by establishing the incorporation of sustainability criteria in the underwriting policy as a goal of the 2024-2026 Sustainability Master Plan.** The aim is to gradually move towards the transition to a low-carbon economy in line with the objectives of the Paris Agreement.

GCO also supports its customers in their transition to decarbonisation. In the case of the credit insurance business, Atradius helps its major corporate customers to diagnose their sustainability situation and to understand the credit risks related to sustainability. It also seeks to help customers by sharing ESG knowledge gathered through external reports or self-reported data and then having an open discussion with them about their plans to transition to a more sustainable company, all of this while also giving them information on best practices.

In the case of traditional business, the Group engages in an ongoing dialogue with its individual customers by informing them of their environmental contribution through the use of sustainable practices in claims management and, in addition, by training industrial insurance customers in risk prevention and risk management, including climate risk prevention measures.

## Underwriting eligibility and alignment according to EU Taxonomy

As a financial sector entity and insurance group, GCO is subject to the obligations of the Taxonomy Regulation 2020/852, which determines which activities are environmentally sustainable.

These obligations include the duty to report to the market the eligibility and alignment indicators of the non-life underwriting activity related to climate change adaptation and mitigation objectives, to which the insurance activity is likely to be able to contribute.

The main GCO KPI's as of 31 December 2023 are set out below.

- Volume of premiums aligned: 142,644,457.7€ (3.23% alignment)
- Volume of premiums eligible but not aligned: 9,950,946.8€ (0.23%)
- Volume of non-eligible premiums: 4,264,354,254.7€ (96.55%)

The lines for which compliance with the Taxonomy requirements has been analysed are non-life insurance related to cover weather-related risks:

- Medical expenses insurance
- Income protection insurance
- Occupational accident insurance
- Motor vehicle civil liability insurance
- Other motor vehicle insurance
- Marine, aviation and transport insurance
- Fire and other damage to property insurance
- Assistance insurance

It should be noted that the regulation excludes relevant lines for the Group's business, such as credit and surety insurance, which represents over 40% of GCO's business.

The analysis of eligibility and alignment of non-life premiums covering climate change risks took into consideration all products that include in their coverage some kind of risk related to climate phenomena (temperature, wind, water, floods, storms, snow, or other similar events), whether chronic or acute. Therefore, all the products that have been deemed eligible and/or aligned include coverage that help mitigate the adverse effects that weather risks can have on the Group's policyholders, not to mention the role played by the Consorcio de Compensación de Seguros in the coverage of extraordinary risks in the Spanish market.

For further information on the calculation methodology and the breakdown of data in accordance with Annex IX, X and XI of the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, see Appendix I of this report.

Information regarding the eligibility and alignment of GCO's consolidated asset items is included in the "Sustainable Investment" section.

# International commitments and alliances

2-28

GCO adheres to the principles of the Global Compact and it is committed to the Sustainable Development Goals. The Group is also a signatory to the UNEP FI Principles for Sustainable Insurance (PSI) and UNPRI Principles for Responsible Investment (PRI).

**Sustainable Development Goals (SDG)**

The business of the Group's companies and the projects of Fundación Occident intrinsically impact the SDGs because of the very nature of their core activities. The contribution to these objectives is in chapter 3 regarding the Group's commitments, within the Social Impact section.

**Principles for Responsible Investment**

Aware that the exercising of its corporate responsibility can contribute to a comprehensive and stable global economy that helps protect the world's assets, in 2020 GCO adhered to the Principles for Responsible Investment (PRI) agreed by the United Nations.

**Global Compact**

Since 2002, the Group has remained committed to the ten principles of the United Nations Global Compact. This implies a commitment to align its strategies and operations with these universally recognised principles, which are grouped into four areas: human rights, labour standards, the environment and combatting corruption.

**Principles for Sustainable Insurance**

In 2020, the Group adhered to the Principles for Sustainable Insurance (PSI) drawn up by the United Nations Environment Programme Finance Initiative, which constitute a benchmark framework for the sector in the attempt to address social, environmental and governance risks and opportunities.

**Nactiva**

GCO is one of the companies forming part of Nactiva Capital Natural S.L., a collective platform for investment in natural capital, the purpose of which is to drive projects in the Mediterranean area, taking advantage of the opportunities offered by nature and integrating and connecting various social and economic agents with a view to maximising the scope and capacity of the projects to protect and regenerate natural capital.

**Other sector alliances**

In addition to the Group's adhesion to the previous initiatives and benchmark organisations on sustainability, in Spain, the Group's companies are also involved with the main UNESPA sector associations (Association of Insurance Companies, which represents Spanish insurance companies before the public administrations) and ICEA (Spanish insurance sector studies service), which have sustainability working groups and programmes. Through UNESPA, GCO supports the work of Finresp (Centre for Responsible and Sustainable Finance in Spain).

The Group is also a member of the EWI (Empower Women in Insurance) network, whose goal is to drive the presence of women in insurance management.

Finally, internationally through Atradius, the Group participates in ICISA (International Credit Insurance & Surety Association) and Berne Union, also known as the International Union of Credit and Investment Insurers, which provide ideas and information that improve the Group's services.

# 03.

# Group commitments

# Employees

2-7, 3-3, 405-1

The team is the most important asset when it comes to creating value for the customers and shareholders of the Group's entities. The Group's human resources policy contains the commitments acquired regarding the recruitment, development and retention of talent for an effective management of employees.

## Profile of the people working in the Group

2-7, 405-1

At year-end 2023, the Group's global workforce totals 8,858 employees, up 22.5% compared to 2022 (7,232 people). This increase is the result of incorporating the employees of Grupo Mémora, a company acquired by GCO in February 2023.

Out of the total number of employees, 47% are women (48% in 2022).

| | 2022 | 2023 |
|---|---|---|
| Employees at 31 December* | 7,232 | 8,858 |
| Average employees | 7,241 | 8,857 |

*Employee data follows the headcount criterion.
*Employment contracts in force at 31 December, excluding the Atradius Board of Directors and traditional business contracts.

**Employees by age and gender**

| | 2022 | 2023 |
|---|---|---|
| < 30 years | 566 | 729 |
| % women | 50.2% | 50.2% |
| 30-39 years | 1,369 | 1,699 |
| % women | 51.5% | 50.2% |
| 40-49 years | 2,289 | 2,803 |
| % women | 53.4% | 51.5% |
| > 50 years | 3,008 | 3,627 |
| % women | 42.7% | 41.9% |
| **Total** | **7,232** | **8,858** |

**Employees according to professional category and gender**

| | 2022 | 2023 |
|---|---|---|
| Administrative support | 964 | 2,241 |
| % women | 67.1% | 51.6% |
| Qualif. admin. and sales staff | 4,602 | 4,645 |
| % women | 50.1% | 51.0% |
| Middle management and technical supervision | 1,535 | 1,801 |
| % women | 33.8% | 34.6% |
| Senior management | 131 | 171 |
| % women | 17.6% | 17.0% |
| **Total** | **7,232** | **8,858** |

**Employees by country and gender**

| | 2022 | | | 2023 | | |
|---|---|---|---|---|---|---|
| | Men | Women | Total | Men | Women | Total |
| Spain | 2,251 | 2,053 | 4,304 | 2,995 | 2,556 | 5,551 |
| Netherlands | 285 | 154 | 439 | 291 | 160 | 451 |
| Germany | 217 | 254 | 471 | 220 | 246 | 466 |
| United Kingdom | 185 | 144 | 329 | 184 | 146 | 330 |
| Belgium | 86 | 133 | 219 | 84 | 135 | 219 |
| France | 106 | 119 | 225 | 115 | 122 | 237 |
| Italy | 96 | 107 | 203 | 97 | 105 | 202 |
| United States | 66 | 60 | 126 | 69 | 65 | 134 |
| Denmark | 41 | 33 | 74 | 43 | 32 | 75 |
| Mexico | 63 | 58 | 121 | 65 | 56 | 121 |
| Australia | 29 | 34 | 63 | 28 | 37 | 65 |
| Portugal | 36 | 58 | 94 | 204 | 214 | 418 |
| Poland | 22 | 26 | 48 | 26 | 27 | 53 |
| Hong Kong | 21 | 22 | 43 | 20 | 25 | 45 |
| China | 12 | 27 | 39 | 9 | 29 | 38 |
| Singapore | 15 | 26 | 41 | 16 | 25 | 41 |
| Ireland | 26 | 12 | 38 | 26 | 13 | 39 |
| Rest of the World | 179 | 176 | 355 | 186 | 187 | 373 |
| **Total employees** | **3,736** | **3,496** | **7,232** | **4,678** | **4,180** | **8,858** |

### Employees by work schedule and country

| | 2022 | | | 2023 | | |
|---|---|---|---|---|---|---|
| | Full-time | Part-time | Total | Full-time | Part-time | Total |
| Spain | 3,943 | 361 | 4,304 | 5,028 | 523 | 5,551 |
| Netherlands | 307 | 132 | 439 | 327 | 124 | 451 |
| Germany | 342 | 129 | 471 | 352 | 114 | 466 |
| United Kingdom | 290 | 39 | 329 | 289 | 41 | 330 |
| Belgium | 174 | 45 | 219 | 177 | 42 | 219 |
| France | 210 | 15 | 225 | 217 | 20 | 237 |
| Italy | 180 | 23 | 203 | 178 | 24 | 202 |
| United States | 124 | 2 | 126 | 132 | 2 | 134 |
| Denmark | 68 | 6 | 74 | 69 | 6 | 75 |
| Mexico | 121 | 0 | 121 | 121 | 0 | 121 |
| Australia | 56 | 7 | 63 | 61 | 4 | 65 |
| Portugal | 94 | 0 | 94 | 415 | 3 | 418 |
| Poland | 46 | 2 | 48 | 51 | 2 | 53 |
| Hong Kong | 43 | 0 | 43 | 45 | 0 | 45 |
| China | 39 | 0 | 39 | 38 | 0 | 38 |
| Singapore | 41 | 0 | 41 | 41 | 0 | 41 |
| Ireland | 36 | 2 | 38 | 37 | 2 | 39 |
| Rest of the World | 339 | 16 | 355 | 354 | 19 | 373 |
| **Total employees** | **6,453** | **779** | **7,232** | **7,932** | **926** | **8,858** |

### Employees by type of contract, work schedule and age*

| | 2022 | | | | 2023 | | | |
|---|---|---|---|---|---|---|---|---|
| | < 30 years | 30-39 years | 40-49 years | > 50 Years | < 30 years | 30-39 years | 40-49 years | > 50 years |
| Permanent – Full-time | 431 | 1,193 | 1,947 | 2,690 | 570 | 1,475 | 2,420 | 3,259 |
| Permanent – Part-time | 18 | 117 | 322 | 301 | 29 | 147 | 345 | 342 |
| Temporary – Full-time | 109 | 51 | 17 | 14 | 105 | 59 | 28 | 16 |
| Temporary – Part-time | 8 | 8 | 3 | 3 | 25 | 18 | 10 | 10 |
| **Total** | **566** | **1,369** | **2,289** | **3,008** | **729** | **1,699** | **2,803** | **3,627** |

### Employees by type of contract, work schedule and job category*

| | 2022 | | | | 2023 | | | |
|---|---|---|---|---|---|---|---|---|
| | Admin. Support | Qualif. Admin. and sales staff | Middle Management and technical supervision | Senior management | Admin. Support | Qualif. Admin. and sales staff | Middle Management and technical supervision | Senior management |
| Permanent – Full-time | 621 | 4,036 | 1,476 | 128 | 1,695 | 4,133 | 1,728 | 168 |
| Permanent – Part-time | 248 | 452 | 55 | 3 | 354 | 436 | 70 | 3 |
| Temporary – Full-time | 83 | 105 | 4 | 0 | 138 | 69 | 1 | 0 |
| Temporary – Part-time | 12 | 9 | 0 | 0 | 54 | 7 | 2 | 0 |
| **Total** | **964** | **4,602** | **1,535** | **131** | **2,241** | **4,645** | **1,801** | **171** |

### Employees by type of contract and gender*

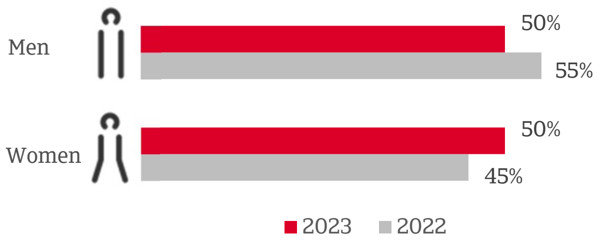
| | | 2022 | 2023 |
|---|---|---|---|
| Permanent contract | Men | 3,628 | 4,557 |
| | Women | 3,391 | 4,030 |
| Temporary contract | Men | 108 | 121 |
| | Women | 105 | 150 |
| **Total** | | **7,232** | **8,858** |

### Employees by type of work schedule and gender*

| | | 2022 | 2023 |
|---|---|---|---|
| Full-time | Men | 3,618 | 4,502 |
| | Women | 2,835 | 3,430 |
| Part-time | Men | 118 | 176 |
| | Women | 661 | 750 |
| **Total** | | **7,232** | **8,858** |

*Given the low turnover in the Group, since the headcount at year-end (8,858) remains practically unchanged in relation to the average headcount (8,857), it is not necessary to calculate the average annual number of contracts, since the figures obtained would be practically identical.

### New hires 401-1




### New hires by age and gender

| | 2022 | | | 2023 | | |
|---|---|---|---|---|---|---|
| Age | Men | Women | Total | Men | Women | Total |
| < 30 | 98 | 68 | 166 | 135 | 104 | 239 |
| 30-39 | 91 | 82 | 173 | 114 | 129 | 243 |
| 40-49 | 68 | 64 | 132 | 113 | 112 | 225 |
| > 50 | 54 | 41 | 95 | 67 | 76 | 143 |
| **Total** | **311** | **255** | **566** | **429** | **421** | **850** |

### Redundancies by age and gender

| | 2022 | | | 2023 | | |
|---|---|---|---|---|---|---|
| Age | Men | Women | Total | Men | Women | Total |
| < 30 | 3 | 3 | 6 | 12 | 4 | 16 |
| 30-39 | 15 | 11 | 26 | 20 | 16 | 36 |
| 40-49 | 12 | 13 | 25 | 23 | 20 | 43 |
| > 50 | 9 | 6 | 15 | 25 | 14 | 39 |
| **Total** | **39** | **33** | **72** | **80** | **54** | **134** |

### Redundancies by professional category and gender

| | 2022 | | | 2023 | | |
|---|---|---|---|---|---|---|
| | Men | Women | Total | Men | Women | Total |
| Administrative support | 5 | 6 | 11 | 40 | 31 | 71 |
| Qualif. admin. and sales staff | 32 | 27 | 59 | 27 | 17 | 44 |
| Middle management and technical supervision | 2 | 0 | 2 | 11 | 5 | 16 |
| Senior management | 0 | 0 | 0 | 2 | 1 | 3 |
| **Total** | **39** | **33** | **72** | **80** | **54** | **134** |

### % Turnover* by age and gender

| | 2022 | | | 2023 | | |
|---|---|---|---|---|---|---|
| Age | Men | Women | Total | Men | Women | Total |
| < 30 | 26% | 22% | 24% | 27% | 25% | 26% |
| 30-39 | 16% | 14% | 15% | 11% | 12% | 12% |
| 40-49 | 7% | 8% | 7% | 6% | 6% | 6% |
| > 50 | 7% | 8% | 7% | 10% | 8% | 9% |
| **Total** | **10%** | **10%** | **10%** | **10%** | **10%** | **10%** |

*The turnover is calculated as total leavers as a percentage of total employees (excluding movements among Group companies).

### Total leavers by age and gender

| | 2022 | | | 2023 | | |
|---|---|---|---|---|---|---|
| Age | Men | Women | Total | Men | Women | Total |
| < 30 | 74 | 63 | 137 | 99 | 90 | 189 |
| 30-39 | 103 | 101 | 204 | 96 | 103 | 199 |
| 40-49 | 70 | 94 | 164 | 81 | 92 | 173 |
| > 50 | 122 | 101 | 223 | 206 | 123 | 329 |
| **Total** | **369** | **359** | **728** | **482** | **408** | **890** |

## Diversity, equality and inclusion

2-17, 3-3, 405-1, 406-1

GCO is firmly committed to effective equal opportunities. This commitment promotes diversity as a key competitive advantage for our businesses and a priority strategy in people management and the generation of an inclusive culture that promotes a balance between professional and personal life in all areas.

### Diversity and equal opportunities

Pursuant to Organic Law 3/2007 for the effective equality of women and men, GCO has an Equality Plan in all Group companies in Spain, the goal of which is to enhance the employment position of women in relation to their jobs and careers.

Furthermore, several of the entities have a protocol for preventing and dealing with sexual harassment for reasons of sex and moral harassment, and the Equality Committee is responsible for ensuring compliance with this protocol.

Strengthening GCO's commitments to equality, the following initiatives are worth mentioning:

- As part of its strategic plan for equality, diversity and inclusion, GCO has set **concrete targets for female representation and the pay gap**:
  - 26% of women in middle and senior management in the credit insurance business by 2027.
  - 30% women in middle and senior management of the traditional insurance business by 2027.
  - Keeping the pay gap below 12% in all professional categories in the traditional and credit insurance business.

- GCO runs training courses and webinars on equality for all employees and for the Group's Board of Directors, with the goal of raising awareness of the basic legislative framework regarding gender equality in the work environment and raising awareness among employees on various related topics such as subconscious bias, the promotion of psychological safety at work and empathy.

- The Group belongs to the EWI (Empower Women in Insurance) Network, an industry initiative advocating real and effective gender equality, whose goal is to boost the presence of women in insurance management.

**Labour inclusion and non-discrimination**

The Group's Code of Ethics promotes real equal opportunities, beyond gender diversity, and does not accept, any type of discrimination in the professional field for reasons of age, race, gender, religion, political opinion, national origin, sexual orientation or disability.

| | 2022 | 2023 |
|---|---|---|
| Cases of discrimination received through the available channels* | 9 | 19 |
| % of resolved cases** | 78% | 74% |
| Human Rights complaints*** | 0 | 0 |

*For confidentiality reasons, actions taken following the identification of cases of discrimination in the organisation are not reported.
**Resolved cases are defined as closed cases.
***Human rights grievances do not include discrimination.

Similarly, the Group is committed to employing people with different abilities. At year-end, 116 people with disabilities form part of the Group's workforce (100 people in 2022).

In that regard, the entities Occident and GCO Tecnología y Servicios have been granted the certificate of exceptionality awarded by the State Public Employment Service, under the provisions of Royal Decree 364/2005, of 8 April, governing the exceptional alternative compliance with the reserve quota in favour of disabled workers. This certificate of achievement allows the aforementioned Group companies to cover the percentage of the workforce with disabilities established by Law through service provision agreements with authorised Special Employment Centres.

With a view to guaranteeing Universal Access for people with disabilities, the Group has offices and work centres where access is enabled for people with reduced mobility, both for its own employees and for associates, customers and visitors. Furthermore, all new facilities have ramps, parking spaces and toilets for people with disabilities. Accessibility to information has also been broadened, and the Group's website is equipped with the most advanced accessibility techniques and guidelines around the world, making it possible for all kinds of users to browse the site.

## Flexibility and work-life balance

3-3

In the area of flexibility and reconciliation, the Group is promoting new ways of working that favour self-management of time, focusing on the productivity and efficiency of employees. It also makes these various measures available in order to respond to their personal needs.

**Remote working**

Remote working was introduced for the Group's employees in 2021. This model sets out various teleworking archetypes depending on the type of position: hybrid mode, which enables employees to combine on-site work in the office with up to 30-40% of the working day to be carried out remotely, and remote mode, when the above percentages of remote work are exceeded.

| | 2022 | 2023 |
|---|---|---|
| Employees with hybrid mode | 4,364 | 4,249 |
| Employees with remote working mode | 842 | 968 |

The hybrid mode enables employees in traditional and funeral business to work 30% of the working day remotely, and 40% of the working day for employees in credit insurance business.

**Work-life balance**

The Group is focussing on the balance between people's personal and professional lives as a lever to encourage real equality and to do this it has specific measures in the different countries in which it operates.

In Spain, some of the key measures available to employees are: flexible start and finish times, single-shift working hours on Fridays and during the summer months, the option of voluntary leave of absence for one year with guaranteed re-entry, as well as canteen services, medical centres, physiotherapy and a sports club, available at some of its sites.

Similarly, these companies offer social benefits such as a parenthood benefit, aid for disabled family members, life insurance in excess of the conditions set forth in the insurance sector collective bargaining agreement and personal loans.

At Atradius, the measures aiming at facilitating and improving people's work-life balance are subject to the regulations in each country. We can highlight, for example, the granting of personal loans in the United

Kingdom or a health clinic that allows employees in the Netherlands to consult a doctor when they experience an imbalance between their work and personal life.

In relation to the right to disconnect, in 2019 the Group approved the internal policy on the right to disconnect from work for all employees outside the normal working hours established in the collective bargaining agreement or contract, as well as during periods of holiday, sick leave and unpaid leave. Among other items, this policy includes the right of employees not to answer emails, messages and calls of a professional nature, as well as recommendations to promote the responsible and effective use of digital tools.

Throughout the year, the Group's employees receive training and education on the use of electronic devices and digital resources.

## Occupational labour, health and safety framework

3-3, 403-1, 403-2, 403-3, 403-4, 403-5, 403-6

**Health and safety**

The Group's entities in Spain have a health and safety service in accordance with current labour legislation. In addition, there are internal procedures and regulations related to occupational health and safety, including self-protection plans for all buildings, risk assessments and annual action plans.

In turn, there is a joint health and safety service that covers most of the Group's insurance companies, allowing for a more consistent management. The entities that are not under this service have their own or outsourced one, based on criteria of efficiency and specialisation.

The general aim is to achieve the following objectives in occupational health and safety:

a) Compliance with current legislation for the prevention of occupational risks and the working conditions of employees.
b) Reduction and elimination of workplace accidents and occupational diseases in all work centres.
c) Development of a health and safety culture based on the consideration of people as its main asset.

In addition, the companies in the Group's traditional business with more than fifty employees and with employee representation have Health and Safety Committees that are entrusted with the task of protecting the health and safety of the employees. The meetings are annual, although extraordinary meetings can be requested to deal with any urgent topics. There is no general policy for the Atradius countries, as most of these countries have their own policy in accordance with local legislation or collective bargaining agreements.

On a corporate level, although there is no specific health and safety policy generally applicable, the Group's commitment to the health and safety of its employees is embodied in its sickness protocols, the inclusion in collective bargaining agreements of benefits in cases of incapacity of any kind to perform work and the creation of an Employee Well-being Plan to foster comprehensive health care.

Similarly, the Group promotes health through offering its employees medical examinations, with the frequency being established on the basis of the job position. Equally, in different work centres employees have access to services for the care and well-being of the employees (such as social clubs offering healthy eating, gymnasiums, swimming pools, tennis and paddle tennis courts) or agreements with special conditions for employees in work centres that do not provide these services.

Besides the abovementioned steps implemented to protect employees, the Group has collective agreements that address issues related to their health and the prevention of occupational risks.

**Employee Well-being Plan**

In 2023, health and safety training and a mental health workshop were held in order to acquire resources, tools and guidelines to become aware of and work in a practical approach on aspects that foster integral development, psychological and physical health, self-knowledge, self-esteem, personal and social well-being and the creation of more positive and cohesive group climates or atmospheres.

Through these measures, alongside those implemented in the areas of flexibility and work-life balance, the Group demonstrates its concern for the well-being of its employees and for having a low rate of absenteeism from work. During 2023, 585,505 hours of absenteeism have been recorded (469,679 hours in 2022).

| **Accident rate indicators** 403-9, 403-10 | 2022 | | 2023 | |
|---|---|---|---|---|
| | Men | Women | Men | Women |
| No. accidents with leave (excl. commuting) | 37 | 42 | 26 | 27 |
| No. of days lost due to accident with leave (excl. commuting) | 1,301 | 867 | 749 | 1,093 |
| No. hours worked according to the collective agreement* | 6,242,655 | 5,845,500 | 7,919,311 | 7,071,331 |
| Frequency index** | 5.93 | 7.19 | 3.28 | 3.82 |
| Severity index*** | 0.21 | 0.15 | 0.09 | 0.15 |
| No. of deaths (as a result of a work accident) | 0 | 0 | 0 | 0 |
| Death rate**** | 0.00 | 0.00 | 0.00 | 0.00 |
| No. of professional illnesses detected | 0 | 0 | 0 | 0 |

* The hours worked have been reported according to the collective agreement to standardise the criteria between the traditional business and the credit insurance business.
** Frequency rate= (No. of accidents with sick leave excluding commuting accidents/no. of hours worked according to agreement)*1,000,000
*** Seriousness index = (No. days lost due to accidents with sick leave/ no. of hours worked according to agreement)*1000
**** Death rate= (No. of deaths due to accidents at work/ no. of hours worked according to agreement)*1,000,000

**Employee coverage** 2-30, 407-1
To improve the regulation of the working conditions of its employees, the Group strives to guarantee that the largest possible proportion of its staff throughout the world are covered by collective bargaining agreements.

GCO guarantees freedom of association and collective bargaining pursuant to Article 5.8 of the Code of Ethics, encouraging social dialogue to consult and negotiate with employees. In that regard, the Group companies encourage the participation of workers' representatives in collective bargaining processes, reporting on issues that may affect workers, as well as on the company's situation and the evolution of employment in the company.

In the traditional business, all companies are governed by collective bargaining agreements. In the funeral business, employees who are not covered by collective bargaining agreements are covered by company agreements negotiated with the Workers' Representation in each area and by the Workers' Statute. In the credit insurance business, the percentage of employees covered by collective bargaining agreements is closely linked to national legislation.

**In 2023, 81% of the Group's employees are covered by collective bargaining agreements** (85% in 2022).

| Country | 2022 | 2023 |
|---|---|---|
| Spain | 93% | 85% |
| Netherlands | 97% | 96% |
| Germany | 100% | 99% |
| United Kingdom | 92% | 92% |
| Belgium | 100% | 98% |
| France | 100% | 100% |
| Italy | 98% | 97% |
| United States | 0% | 1% |
| Denmark | 97% | 97% |
| Mexico | 45% | 45% |
| Australia | 0% | 0% |
| Portugal | 65% | 93% |
| Poland | 0% | 0% |
| Hong Kong | 0% | 0% |
| China | 0% | 0% |
| Singapore | 0% | 0% |
| Ireland | 29% | 28% |
| Rest of the World | 28% | 27% |
| **Total** | **85%** | **81%** |

## Training and development

2-17, 3-3, 404-1

GCO has always prioritised human and professional development, investing in continuous training, giving priority to internal promotion, encouraging personal motivation, teamwork and innovative initiative. That is why, in the companies in the traditional business, there is a series of professional development programmes, appropriately structured to accompany the employees through their growth process.

These programmes are supplemented by many other training courses that the training units are continually updating. In addition, skills-related training and development for employees is promoted through the Goodhabitz platform.

In the case of the credit insurance business, the "Atradius Academy" is a learning platform available to all employees where they can find a wide selection of online courses. The platform receives regular updates that include the addition of new courses. The aim is to encourage employees to take an active role in their own training development and take advantage of all these opportunities to keep refreshing their knowledge and improving their professional skills.

**Professional development programmes**

- Polaris Programme: Designed for new hires, it is a welcome programme in which all the opportunities offered by the Group are presented to employees.
- Delta Programme: For newly incorporated people, this programme seeks to make sure that employees are better acquainted with the reality of their company and the functions and challenges of each department.
- Insignia Programme: intended for developing people with a multi-company vision, in which the Group's corporate areas are presented and employees are encouraged to strengthen their personal brand.
- Apolo Programme: Dedicated to employees who have assumed responsibility for managing people and teams, to work on developing the Group's own management skills and tools.

In addition, the Group has a job standardisation model that is has produced itself. This management tool is considered essential in establishing professional development pathways.

**Sustainability training**

Compulsory sustainability training is given to all Group employees, as well as to GCO's Management Committee and Board of Directors.

The training covers basic concepts on sustainability, climate change and environment, ESG risks, regulation and trends, sustainability initiatives and GCO's sustainability strategy. The aim of this training is to involve the entire workforce in the Group's sustainability, raising their awareness of the ESG concepts and giving them guidelines on how to contribute to obtaining the sustainability objectives.

**Attracting young talent**

Similarly, the group is focussing on talented young people who are enthusiastic about their professional development, promoting the employment of students and recent graduates through university and school agreements. Work placements in the company encourage young people to learn and grow, giving them the opportunity to demonstrate their aptitudes and develop new knowledge and skills.

In France, Atradius has been awarded the **HappyTrainees label** which acknowledges companies that have achieved excellence in their student integration, support and training systems.

**In 2023, upwards of 205,589 hours of training were provided to Group employees** (185,820 hours in 2022), 11% more than the previous year, representing an average of 23 hours per employee (average of 26 hours per employee in 2022).

| **Training hours** 404-1 | 2022 | | | 2023 | | |
|---|---|---|---|---|---|---|
| | Men | Women | Total | Men | Women | Total |
| Administrative support | 6,516 | 12,838 | 19,354 | 17,839 | 23,891 | 41,730 |
| Qualified administration and sales staff | 53,157 | 55,440 | 108,597 | 50,147 | 54,966 | 105,113 |
| Middle management and technical supervision | 31,754 | 20,811 | 52,564 | 33,790 | 20,795 | 54,584 |
| Senior officers | 4,250 | 1,055 | 5,305 | 3,073 | 1,089 | 4,162 |

| **Average training hours** 404-1 | 2022 | | 2023 | |
|---|---|---|---|---|
| | Men | Women | Men | Women |
| Administrative support | 20.6 | 19.8 | 16.5 | 20.6 |
| Qualified administration and sales staff | 23.2 | 24.0 | 22.1 | 23.2 |
| Middle management and technical supervision | 31.3 | 40.1 | 28.7 | 33.4 |
| Senior officers | 39.4 | 45.9 | 21.6 | 37.5 |

**Performance assessment** 404-3

Performance assessment allows us to have a full vision of the internal talent in the Group, and to take decisions and design action plans based on the needs detected.

The Group's performance assessment procedure consists of the following phases:

- Self-assessment: Employees assess their skills, as well as achievement of the goals set.
- Assessment by the manager: the team managers conduct the assessment of the employees.
- Personal interview and personalised improvement plan: the manager and the employee share the conclusions and set the goals for the forthcoming year.

In 2023, 53% of professionals subject to performance assessment have been assessed through this tool (61% in 2022).

| **Percentage of employees receiving regular evaluations on their performance and professional development** | 2022 | | | 2023 | | |
|---|---|---|---|---|---|---|
| | Men | Women | Total | Men | Women | Total |
| Administrative support | 29% | 38% | 35% | 8% | 21% | 15% |
| Qualified administration and sales staff | 59% | 59% | 59% | 63% | 62% | 62% |
| Middle management and technical supervision | 84% | 79% | 82% | 77% | 72% | 75% |
| Senior officers | 71% | 83% | 73% | 50% | 69% | 53% |

## Remuneration and benefits

3-3

The group focusses on a remuneration system based on a meritocracy and rewarding performance, cooperation and teamwork. The different collective bargaining agreements that apply, depending on the company, establish salary bands to ensure internal equity and attract talent. In these agreements, under no circumstances are there pay gaps on the basis of gender. The Group also periodically carries out aggregate remuneration studies between men and women to ensure that it applies a non-discriminatory remuneration policy based on the responsibilities assumed and the results obtained.

Generally speaking, GCO's compensation model includes fixed and variable annual remuneration, as well as a flexible remuneration system that has included, among others, a Share Delivery Plan in recent years. Other examples of flexible remuneration include: payment of public transport tickets, health insurance, childcare and job-related training, among other benefits.

Additionally, the Group's employees have an extensive programme of social benefits including pension plans, company canteen or compensation for meals, financing of employee training (university training, MBA, languages), help for disabled family members, personal loans, birth bonus, offers and specific agreements for vehicle leasing.

GCO has partnership agreements with seven prestigious institutions (UNIR, UOC, EADA, ISDI, EAE, The Valley and Deusto Business School). These agreements offer discounts of up to 40% on training programmes to GCO employees and, depending on the centre, their families.
Since 2016, employees of the Group's different companies who end their employment period due to

retirement have the opportunity to take part in the GCO Retirees' Association, the purpose of which is to foster and promote communication and relations between its members through social and cultural activities that are co-financed by the Group and consist of visits to museums, conferences, themed routes, attending shows and gastronomic gatherings.

Furthermore, with the goal of achieving a better organisational adaptation of the workforce with a view to the future corporate unification of the traditional business, GCO has presented a voluntary redundancy plan that will be implemented over two years.

| **Average remuneration by professional category and gender and wage gap** 405-2 | | **2022** | **2023** |
|---|---|---|---|
| Admin. Support | Men | 24,624 | 27,113 |
| | Women | 28,655 | 26,853 |
| | *Average remuneration ratio women/men* | *116%* | 99% |
| Qualified administration and sales staff | Men | 48,404 | 54,153 |
| | Women | 43,160 | 46,652 |
| | *Average remuneration ratio women/men* | *89%* | 86% |
| Middle management and technical supervision | Men | 77,629 | 82,368 |
| | Women | 66,067 | 68,281 |
| | *Average remuneration ratio women/men* | *85%* | 83% |
| Senior officers | Men | 163,220 | 170,316 |
| | Women | 146,685 | 152,736 |
| | *Average remuneration ratio women/men* | *90%* | 90% |

| **Average remuneration by age and gender and wage gap** 405-2 | | **2022** | **2023** |
|---|---|---|---|
| < 30 years | Men | 31,077 | 33,059 |
| | Women | 29,718 | 30,016 |
| | *Average remuneration ratio women/men* | *96%* | 91% |
| 40-49 years | Men | 43,653 | 44,338 |
| | Women | 38,488 | 37,728 |
| | *Average remuneration ratio women/men* | *88%* | 85% |
| 30-39 years | Men | 56,694 | 56,039 |
| | Women | 44,738 | 45.260 |
| | *Average remuneration ratio women/men* | *79%* | 81% |
| >50 years | Men | 67,992 | 70,188 |
| | Women | 50,996 | 52.813 |
| | *Average remuneration ratio women/men* | *75%* | 75% |

The decrease in the Average remuneration ratio women/men in 2023 compared to 2022 is due to the acquisition of Grupo Mémora in February 2023. The wage gap based on age originates from the larger number of men who in previous years accessed high responsibility jobs. This difference is gradually being eliminated since there is currently greater balance between the number of women and men who access these types of positions.

## Culture and employee experience

The Group understands that its employees are one of its greatest assets and therefore endeavours to provide an enriching working environment for them.

In 2023, **GCO has been selected as one of the 100 best companies to work for in Spain according to the Forbes ranking**, which rates not only the remuneration conditions but also those measures that improve employees' quality of life.

The opinions and ideas of the Group's employees are important so that we can create a better working environment. That is why we regularly work environment surveys, which allow the Group to gain a deeper understanding of the experience of the employees and to work on strengthening our best internal practices.

Commitment and employee satisfaction are the key attributes that the Group seeks to maintain with its employees. The latest work environment survey for employees in the traditional business produced the following results:

- 93% of the respondents want to continue working in the Group.
- They have given a score of 8.8 out of 10 for the level of collaboration and comradeship within the teams and departments.
- The employees rated job security and pride of belonging to the organisation at 8.8 out of 10.

Following the results obtained, a series of initiatives were launched, including the following: launching a corporate well-being plan, further promoting remote work and increasing the visibility of the professional opportunities generated by the Group.

Additionally, in order to be more streamlined and improve the employee experience, an AI-based chatbot was implemented on the intranet in 2023, which has been designed to provide accurate and quick responses to a broad range of queries on issues such as training, recruitment and hiring, social benefits and occupational risk prevention, among others. This will streamline and improve communication between employees and the human resources area.

In the case of Atradius employees, the following results were obtained after the last satisfaction survey:

- The level of satisfaction with the organisation was 8 out of 10.
- Employees also rate the organisation's inclusiveness and the degree of collaboration and team spirit within teams and departments an 8 out of 10.

These results have led to the Group rolling out global and local action plans in each country, which include, among other activities, the launch of workshops, development programmes and training to ensure the continuous learning and development of its employees.

# Customers

2-6, 3-3

GCO's core goal in its relationship with its more than 3.7 million customers* is to offer them competitive products and a quality service, based on personal and close advice and agile management.

## Customer experience

GCO is committed to giving its customers simplified and clear information, and to resolving any queries they may have about the content of its policies and services, or in the event of any incident.

This commitment, in the credit insurance business, is embodied in the Customer Service Charter and, in the traditional insurance business, in its adherence to Unespa's Guide to Good Practices for Transparency in the Marketing of Insurance.

Similarly, both the professionals who provide service to customers during a claim and the contact centre staff have customer experience guidelines that lay down clear protocols on how to relate and interact with them, in order to offer the highest level of service during the exercise of their activity.

GCO works on a daily basis to offer excellent service, enhance products and, in short, provide the customer with a differential experience. To this end, the Group conducts various analyses that collect the Voice of the Customer to find out their degree of satisfaction and recommendation, their opinion and needs, as well as their image of the brand.

| Customers | 2022 | 2023 |
|---|---|---|
| **Traditional insurance** | **3,543,237** | **3,593,539** |
| Personal | 90% | 89% |
| Companies | 10% | 11% |
| Retention rate | 87% | 88% |
| **Credit insurance** | **80,650** | **83,142** |
| Retention rate Spain | 94% | 94% |
| Retention rate Other | 94% | 95% |
| **Funeral business** | **Not reported** | **54,528** |
| Personal | Not reported | 21,261 |
| Insurance companies | Not reported | 33,267 |

- **NPS (Net Promoter Score):** Indicator for measuring the degree of customer loyalty.

**Traditional business: 49.1%** (-0.8 pp)
**(Post-contracting surveys, post-claim, pre-renewal and post-renewal)**

**Funeral business: 80,69%**
**(Post-service surveys)**

- **Customer Journey:** Customer Journey: its goal is to continuously review the main interactions of customers with the company, identifying the key points of value contribution in order to design measures geared towards enhancing their experience.

*Insurance customers include policyholders and funeral customers include the services provided.

**In 2023, several initiatives have been undertaken to provide a better experience and positive customer satisfaction.**

- **Preferential financing** is offered through a credit bank to enable customers to pay for the repair of claims not covered by car insurance.
- **Your digital health** is a comprehensive health service with a strong focus on prevention and care. It provides with access to a team of specialist doctors wherever you are, as well as providing different services such as medical chat, video consultation, medical reports or prescriptions.
- Improvements have been made to the **Healthcare and Mixed Reimbursement health products**, now including more comprehensive diagnostic tests for pregnancy, particularly when there are risks for the mother and/or foetus, as well as new surgical techniques and treatments to enhance the medical care provided to policyholders.
- In the contact centre, a **specific channel has been created for senior customers** in order to speed up and improve their care. To do so, operators have been specifically trained in how to adequately assist people over 65 years of age.
- **Personalised videos** are sent to customers explaining the content of their policies, in order to inform customers in an agile, comprehensive and individualised way.
- GCO is working on developing **on-demand insurance** with the goal of responding to the pace of life and the needs of the new generations. Under this proposal, the idea is to provide flexibility in contracting, allowing coverage to be purchased at a specific time and for a specific duration.
- Within Atrium, the online policy management portal for credit insurance customers, **Atrium Analyser** has been rolled out. This is a tool that lets customers see themselves as buyers, see how Atradius can help them grow their business and enables them to find quality buyers in the markets in which they do business.
- Through customer feedback, **the E2E customer journey has been improved on Atradius Agora**, the e-commerce platform launched by Atradius to allow its customers to submit and monitor debt collection cases, pay invoices and communicate with their account manager.

## Complaints and claims system

3-3

Good management of customer complaints and claims is a basic element in the quality of service. The first step in resolving them is to offer the customer immediate attention from whoever is directly in contact with them.

### Insurance business

In Spain, GCO has regulations for defending customers adapted to the requirements of Order ECO/734/2004 of 11 March on the customer service departments and services of financial institutions and the commitments assumed by the insurance sector through the guidelines on good practices for internal complaint resolution promoted by Unespa. This regulation is also applicable to the Group's other financial customers (participants in investment and pension funds, members of GCO's EPSV and customers of Occident Hipotecaria). Outside Spain, given the singularity of its business, Atradius has its own process for dealing with complaints and claims based on internal procedures and the regulations present in each country.

**Process for responding to complaints and claims:**

**Different accessible channels** for customers to report their complaints and claims through letters, the Customer Service Department mailbox, contact centre, regulator's mailbox, telephone, email or in the specific sections of the website to receive complaints, claims or queries.

**Designation of managers** to assess the causes of complaints and claims and coordinate their resolution and identify whether it is a requirement of the regulator.

**Information to customers and users** on the status of complaints and how they are resolved.

**Oversight of complaints and claims** by the Delegate responsible for managing the complaint or claim. In Spain, an inspection is also conducted by the Customer Ombudsman.

**Annual registration and measurement** of the number of complaints received for statistical purposes and achievement of goals.

Pursuant to the above procedure, the details of complaints and claims of the insurance business are presented:

| Claims and complaints from the insurance business | 2022 | 2023 |
|---|---|---|
| In Spain and Andorra | 4,427 | 5,857 |
| Admitted for processing | 3,607 | 4,185 |
| Resolved | 3,212 | 3,675 |
| Open | 395 | 510 |
| Other countries | 437 | 387 |
| Admitted for processing | 437 | 387 |
| Resolved | 404 | 351 |
| Open | 33 | 36 |

In Spain, this includes data from the traditional business in Spain and Andorra and from the Atradius business in Spain. In this context, complaints are deemed to be those submitted by users of financial services who, in order to obtain the restitution of their interests or rights, submit specific facts referring to actions and omissions of the Company or which represent a detriment to their interests or rights through breach of contracts, of transparency and customer protection regulations or of good financial practices and usages. Complaints are also deemed to be those referring to the functioning of the financial services provided to users by the entities and presented due to delays, type of attention or any other type of shortcoming.
In all other countries, complaints and claims from Atradius Business outside Spain are included, which are deemed to be the expression of dissatisfaction due to an error or delay in the provision of the service or the provision of a service in an unsatisfactory or sub-standard manner.

## Funeral business

All GCO funeral business centres are certified by the ISO 9001 Quality Management and UNE EN 15017 Funeral Services standards, which require a procedure to be in place for dealing with customer complaints. Compliance with this standard is assessed annually through audits conducted by AENOR International (for Mémora) and Bureau Veritas (for Asistea).

**Process for responding to complaints and claims:**

**Different accessible channels** for customers to report their complaints and claims through the contact centre, telephone, email, on the website or in the work centres.

**Designation of managers** to investigate and analyse the origin or otherwise of complaints and claims.

**Response to customers** on the status of complaints and how they are resolved

**Annual registration and measurement** of the number of complaints received for statistical purposes and achievement of goals.

Pursuant to the above procedure, the details of complaints and claims of the funeral business are presented:

| Claims and complaints from the funeral business | 2022 | 2023 |
|---|---|---|
| Complaints and claims | Not reported | 368 |
| Admitted for processing | Not reported | 368 |
| Resolved | Not reported | 367 |
| Pending | Not reported | 1 |

# Shareholders and Investors

In 2023, GCO continues along a positive trend, with growth in turnover and sound results, with an improvement of more than 13.4% in its consolidated profit. In addition, it has maintained a strong, close and transparent relationship with the financial market.

## Dividends, attractive return on investment

In 2023, the Group increased its dividend by 8.67%, distributing 134.1 million euros.


Units: euros/share

All of the information about the evolution of the Group's shares can be found on the Group's corporate website.

## Transparency of information

2-23

Shareholder confidence is key to our sustainability over the long term. The relationship between the Group and its shareholders and investors is built on providing them with as much information, transparency and approachability as possible. GCO conducts its activities pursuant to the principles of good governance and corporate responsibility, which entails ongoing improvement in the accessibility, quality, frequency and clarity of the relationship with its core stakeholders.

The communication policy for economic-financial, non-financial and corporate information and contacts with shareholders, institutional investors and proxy advisors, which is posted on the corporate website, describes the various communication tools and channels to ensure the principles of integrity, transparency, truthfulness, immediacy and equality in the information provided to shareholders, institutional investors, proxy advisors and the markets in general, as well as relations with them.

In this regard, the Group has two specific areas within the organisation to respond to queries from shareholders and institutional investors, their proposals and expectations on the management in a close and individualised way.

**Shareholder Relations Unit:**
+34 935 825 001
**accionistas@gco.com**

**Investor Relations, Rating Agencies and Sustainability Unit**:
+ 34 915 661 302
**investor@gco.com**

This last unit covers the relationship with financial analysts, stock market analysts and rating agencies, given that the reports and opinions of all of them influence the decision-making process of institutional investors. As such, their role is crucial to GCO's liquidity and share price formation.

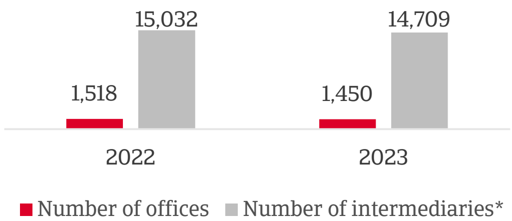
During 2023, the Group conveyed its value proposition to the financial markets through quarterly broadcasting of published results (via webcast in Spanish and English) and by holding roadshows and conferences in several European countries, both on-site and online. These events bring the Group's business reality closer to both institutional investors and small shareholders.

# Intermediaries: agents and brokers

2-8

Intermediaries are a key part of the Group's relationship with its environment. They come into contact with customers, generate confidence in order to understand their particular needs, and provide value through their professionalism and closeness. That is why, good communication and a trusting relationship with intermediaries are fundamental to providing good customer service.

The commercial network of the GCO companies comprises 14,709 traditional business intermediaries, mainly exclusive agents and insurance brokers, and 1,450 offices.




*The data on intermediaries follow the headcount criterion as at 31 December of the financial year.

The contractual relationship of intermediaries with the various insurance companies of the Group is governed by a commercial contract.

**Management of intermediaries**

Considering current trends and the needs of its customers, GCO is committed to encouraging the figure of the hybrid salesperson, training intermediaries to provide them with resources and skills that enable them to adapt to the digital reality with a view to providing a better service to customers.

For the marketing management of intermediaries, the Group has developed Gestiona, a single Customer Relationship Management (CRM) between entities that standardises the monitoring of the sales activity of traditional business companies and features functionalities such as video call and chat with the customer through the Gestiona app. The application uses 360° Vision to display the customer's information in a unique and comprehensive way. The indicators section provides access to surveys carried out on customers at various points along the customer journey. Alerts are also displayed in the access to Commercial Management when there are customers who have responded to a satisfaction survey with an NPS (level of recommendation) score of very good or very negative.

In 2023, new changes have been brought in and work has been done on adding new features to the tool based on AI algorithms.

Similarly, data analytics has been built in for creating and managing the network of intermediaries.

**Professional development and training**

Training of agents is a fundamental value, allowing the Group to build its business through quality of service and customer satisfaction and trust. That is why the various companies comprising the Group make available to the intermediaries a series of training itineraries and the necessary tool for these professionals to perform their tasks in the most professional manner possible, in a way that is close and adapted to customer needs, thus improving their effectiveness.

Training across the distribution network in the traditional business is focussed on developing the sales force and business growth. A special focus was also given to cross-selling, prevention of cancellations, customer loyalty and the use of new tools and systems. Furthermore, efforts are being made to foster and strengthen intermediaries' knowledge of the responsible marketing and sale of products and services. Specifically, they have been encouraged to take training in specialised attention to the most vulnerable groups, such as customers over 65 years of age and the disabled.

**Trust and security**

The Group's companies manifest the values of confidence, peace of mind and security that they wish to provide to their customers through the broker network. For this, they are provided with support that, in addition to training, includes other tools that have a positive impact on their activity. These include the option of creating their own website and profile on social networks or the use of corporate material to present their services visually.

**Intermediaries' satisfaction**

GCO measures the satisfaction indicators of its traditional business intermediaries on an annual basis. Through an opinion survey for exclusive agents carried out by ICE, the Group ascertains the level of general workplace satisfaction of its agents.

# Supply chain

3-3, 2-6

GCO companies work with two kinds of service providers:

- Suppliers, who provide products and services of a general nature, not directly linked to the insurance business: cleaning, maintenance and IT support, among others.
- Associates, whose service is essential for the performance of the insurance activity: loss adjusters, lawyers, workshops and repairers.

## Supplier management

2-6

In 2023, GCO worked with upwards of 13,000 suppliers, resulting in expenditure of approximately 530 million euros (in 2022, GCO worked with more than 7,500 suppliers, resulting in expenditure of 368 million euros).

Specifically, in the traditional insurance business the number of suppliers was 3,933 (4,419 in 2022) and 2,833 in credit insurance business (3,082 in 2022). The expenditure incurred on these suppliers amounted to 161 million euros and 249 million euros, respectively (compared to 153 million and 215 million in 2022).

In the funeral business, collaboration has taken place with 6,285 suppliers, resulting in an expenditure of 120 million euros.

**Responsible supplier selection**

The Group's supplier screening is based on the principles of objectivity, impartiality, transparency, equal treatment and quality. The Group also strives to encourage responsible management by suppliers, including social and environmental aspects among the criteria for their selection. In traditional business, these criteria are laid down in internal regulations and, specifically, in the supplier selection manual.

In the credit insurance business, Atradius has a Procurement Policy that regulates supplier management.

In the funeral business, the selection, monitoring and assessment criteria in the procurement process have been designed to meet the requirements of the integrated quality, environmental and social responsibility management system. This system follows the guidelines of the UNE-EN ISO 9001, ISO 14001 and SGE 21 standards, among others. It is stipulated that, whenever possible, suppliers that comply with environmental criteria will be selected (e.g. ISO 14001 certification, low noise and atmospheric emissions, low electricity and water consumption, etc.).

## Associate management

2-6

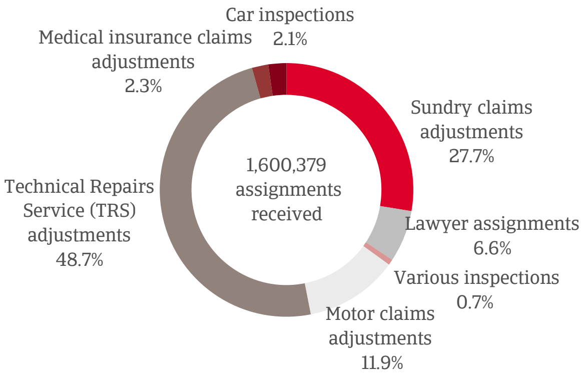
Prepersa is the GCO company that manages the specialist claims settlement partners of the traditional business companies: loss adjusters, workshops, repairers and, from 2021, the network of lawyers. The workshops are part of a network named AutoPresto and the repairers are from the Technical Repairs Service (TRS).

In 2023, it worked with 2,834 partners (2,685 in 2022) and the total expenditure was 260.9 million euros (217.5 million in 2022).

**Type of associates**

| | 2022 | 2023 |
|---|---|---|
| General claim adjusters | 711 | 720 |
| Repairers | 889 | 1,002 |
| Motor claim adjusters | 228 | 230 |
| AutoPresto workshops | 380 | 437 |
| Medical claim adjusters | 125 | 115 |
| Lawyers | 352 | 330 |

**Orders received**




The associates are there to ensure the effectiveness and speed of the service provision when resolving the incidents suffered by customers of the Group's insurance companies, as well as to provide those entities with technical information related to risks, claims and other circumstances. For this reason, Prepersa's actions must always be quality oriented. For this purpose, its activity has the UNE-EN ISO 9001-2015 quality certification, which guarantees that its processes are geared towards continuous improvement and that it has an efficient organisation with regard to planning, control and analysis of results.

**Associate satisfaction survey**

As every year, the "associate satisfaction survey" was conducted among 2,887 associates, of which 33% responded. The main objective of the survey is to understand the Group's relationship with its supply chain through their opinions, assessments and experiences.

Some of the findings from the survey are as follows:

- The associates rated GCO's innovation capacity as very good, with a score of 8.2 for this question.
- They stated that the organisation helps them to resolve any queries, incidents or any problems that may arise, giving this question a score of 8.1.
- They rated the Group's professional competence as very good (8.5).

**Training for associates**

In 2023, GCO associates received a total of 2,610 hours of training (5,504 hours in 2022). The training programmes were given by Prepersa staff in person and also with video tools and webinars, and associates rated the training sessions very positively.

In 2023, Prepersa took part in designing training courses given by APCAS (Spanish Association of Insurance Loss Adjusters) and the INESE training centre for the various loss adjusters who join the Group's network. Furthermore, it has arranged with APCAS a system of certifying experts who do not have a degree but who do have experience, so that they can prove their knowledge and aptitude and offer them advantageous conditions as they are part of the Prepersa network.

## Integration of ESG issues into the supply chain

3-3, 308-1, 407-1, 414-1

The Group extends the reach of its principles to its supply chain as a key to consolidating a network of suppliers and associates consistent with the corporate values.

Throughout 2023, the Group has continued to insert clauses in contracts with traditional and funeral business suppliers, through which the Group ensures that they abide by the same ethical and sustainability principles, comply with the labour regulations that affect them and are up to date with their tax obligations. In 2023, 517 contracts with suppliers have included the sustainability clauses (430 in 2022).

Similarly, in the funeral business, a specific sustainability clause has been gradually included in contracts with suppliers. This clause requires suppliers to ensure compliance with the ethical, labour, social and environmental criteria laid down in the Declaration of Human Rights, as well as those advocated by the ILO. In the same way, it ensures that suppliers know, observe and assume those points that may concern them in the Code of Conduct.

With regard to associates, they must all respect the corporate values in order to be able to maintain a relationship with the Group. Therefore, they must adhere to the GCO Code of Ethics before receiving any order.

Prepersa also fosters good practices related to efficiency and minimisation of resources, which include policies of repair rather than replacement or the application of new technologies that make it possible to locate and repair water damage more efficiently in a non-invasive manner. The application of these practices has saved more than 715 tonnes of $CO_2$. It also avoids extended repair periods and does not require the use of extra material.

Additionally, a Collaborator Coverage Plan has been developed, involving relocating associates and selecting new ones to cover the places where the repair service was not offered, in order to save time in travelling and to improve efficiency. Besides improving customer service, this project will enable the development of future plans to reduce indirect $CO_2$ emissions arising from these journeys.

Similarly, a new procedure for assessing claims arising from atmospheric phenomena has been rolled out through video assessment, with a group of specialist loss adjusters who are fully dedicated to this kind of assignment. This has led to an improvement in efficiency by attending to more claims, eliminating emissions derived from travel and improving the customer's perception of the service.

It is also worth highlighting the launch of a project to digitalise all documentation issued to customers and professionals, thereby cutting down on the use of paper. This documentation includes contracts with associates, the compensation proposal given by the loss adjuster to the customer, the Home Claims Intervention Sheet (STR) and the Inspection Report following repairs in Autopresto workshops.

Environmentally, all AutoPresto workshop contracts include a clause requiring the workshops to be accredited as waste managers, providing Prepersa with the information required to justify this. All these contracts are issued digitally in order to cut down on the company's paper consumption.

**Certified sustainable workshops**

The vehicle repair service that GCO offers through the AutoPresto workshop network has become the first to receive the "CZ Sustainable Workshop Network" certification. This seal guarantees that its activity is carried out in accordance with sustainability and environmental care criteria.

At present, the supply chain is not audited for ESG issues.

## Distribution by geographical area

203-2, 204-1

At GCO, working with local suppliers and associates not only has a positive impact on the economic development of the communities in which we do business, but also cuts operational risk by reducing service execution times.

In the traditional business, due to its activity and presence in Spain, the hiring of freelancers or small local businesses as suppliers is favoured. Thus, in 2023 most of the orders were placed with suppliers in Spain, with 99% of the expenditure going to local suppliers (a similar figure to 2022). In the credit insurance business, the Group allocates most of its expenditure to developing the business fabric in the geographical areas in which it conducts business, with 96% of spending going to local suppliers (97% in 2022). Lastly, in the funeral business, 92% of expenditure is allocated to hiring local suppliers.

As regards associates, in 2023, 98% of expenditure was allocated to associates in Spain (96% in 2022).

## Average payment period for suppliers and associates

The average payment period to suppliers of the Group companies is 21 days (14 days in 2022), with no outstanding balance to be paid in excess of the legal payment period (30 days, unless otherwise agreed by the parties).

In the case of associates, Group companies pay amounts to associates on a daily basis, where the average payment period is 1 day (same figure as in 2022). Furthermore, associates have at their disposal an application where they can consult and reconcile payments of orders and invoices issued to Group entities. This prevents the associate from having to communicate their information requirements to different company departments.

# Climate change

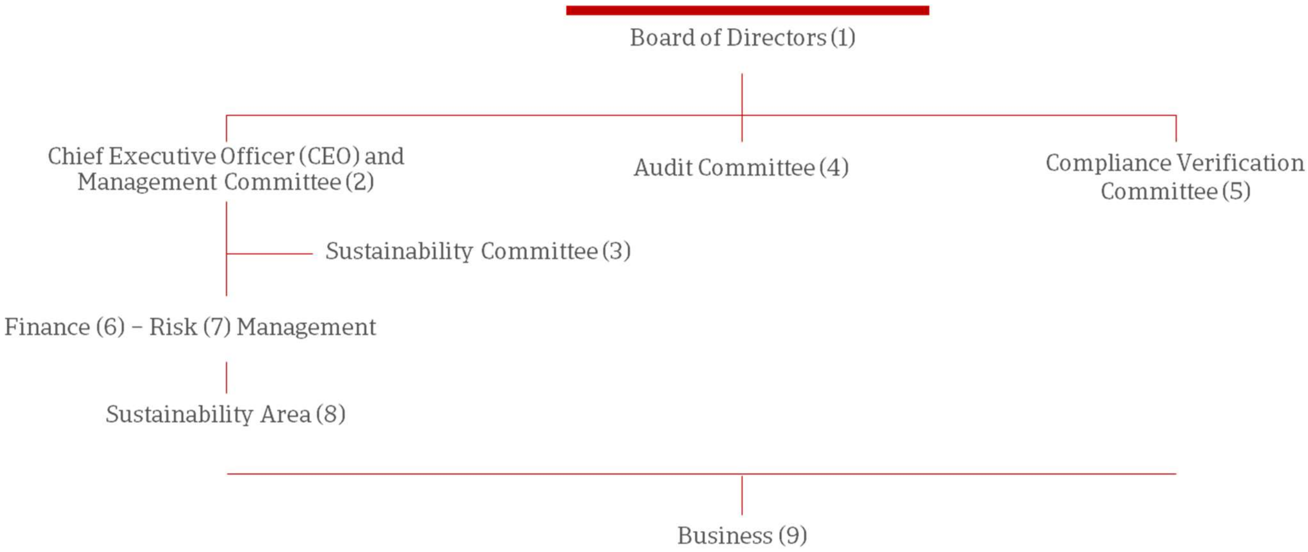
3-3

With the aim of being an active part of the transformation towards a low-carbon economy, GCO is committed to being a zero net emissions organisation by 2050 in its insurance underwriting portfolio.

The Group also follows the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and integrates climate change risk information and performance into its reporting.

## Climate change governance

2-9, 2-13




(1) Approves the climate change strategy and policy.
(2) Proposes the climate change strategy and targets. Monitors the execution of the strategy and regularly reviews its evolution.
(3) Supervises and regularly monitors the climate change strategy and compliance with the actions and objectives associated with it.
(4) Oversees the Group's risk management control system.
(5) Assesses, advises and reports on all matters relating to the verification of compliance with the legal obligations applicable to climate change.
(6) Regularly monitors compliance with climate change targets.
(7) Tasked with governing and coordinating the process of identifying and assessing the Group's climate change risks.
(8) Coordinates and develops with all the businesses the climate change strategy, the proposal of targets and the monitoring of the actions to be undertaken.
(9) In charge of implementing the climate change strategy

## Climate change strategy

GCO supports the Paris Agreement and is working towards being an active part of the solution to climate change. To do this, it focuses its strategy on gradually reducing its greenhouse gas emissions.

The Group's Climate Change and Environment Policy constitutes its action framework and defines the commitments assumed in this area. In this regard, GCO will set intermediate, progressive and science-based targets that will allow it to achieve the ultimate goal of being a carbon neutral company in its underwriting portfolio by 2050.

Identified below are the Group's risks and opportunities related to climate change and we describe the organisation's resilience to them, taking into account different climate-related scenarios.

**Risks and opportunities of climate change**

2-6, 2-12, 2-23, 3-3, 201-2

Within the framework of the risk management system, the Group undertakes to identify the risks and opportunities related to climate change, including them in its risk map, and to analyse their impact on financial planning. Among the risks included in the risk map, the following have been identified as the main categories:

- **Physical risks:** Those derived from climate change and which arise from a series of specific meteorological events. They may entail financial implications for the organisations, both relating to direct damage caused to assets and indirect impacts arising from an interruption that affects the supply chain.
- **Transition risks:** These arise as the company adapts to a low-carbon economy. There are a series of factors that influence the adjustment to a sustainable economy such as, for example, the evolution of the different policies, the regulations, new technologies or business models, change of sensitivities and social preferences or the evolution of the framework and legal interpretations.
- **Liability risks**: Arising from claims either for civil liability or directly against insurers for failing to manage climate risks appropriately.

Disclosure of information on how these climate risks have been factored into the Group's risk map, as well as their strategic impact and time horizon is explained in chapter 1 under "Risk management".

In addition to the existing risks described above, there are also a series of associated opportunities that the Group takes into account in order to take advantage of them and position itself correctly:

- **Market opportunities**: access to new markets that have undergone changes as a result of climate change and therefore require new insurance coverage.
- **Opportunities in the use of resources**: cost reduction and savings through more efficient management of resources and the use of more efficient and sustainable buildings.
- **Resilience opportunities**: Participation in renewable energy programmes and adoption of energy efficiency measures.
- **Product and service opportunities**: Development of new low emission products and services and according to new customer preferences.
- **Energy source opportunities**: Reduction of exposure to future increases in the price of fossil fuels and reputational benefits of using less carbon-intensive energies.

**Analysis of scenarios**

In 2023, GCO once again conducted an assessment of the impact that climate change risks could have on its business. To do so, the Group's risk profile was used as a starting point, estimating the impact that two opposing climate scenarios would have on it: one with a global temperature increase of no more than 2°C, and the other with an increase of more than 2°C.

To simulate both scenarios, an analysis was performed on the scenarios proposed by the Intergovernmental Panel on Climate Change (IPCC) in its latest report of August 2021, where potential impacts were defined, taking into account environmental and socio-economic factors intrinsically linked to climate change. Based on this information, the scenarios analysed are:

- Scenario with an increase in the planet's global temperature of no more than 2°C: The SSP1-RCP2.6 scenario has been selected aligned with the upper boundary of achieving the Paris Agreement targets and the updated nationally determined contributions (NDCs) at COP26. This scenario would be mainly affected by transition risks.
- Scenario with an increase in the planet's global temperature exceeding 2°C: Information from the SSP5-RCP8.5 scenario has been used, which represents a no-climate-policy scenario that enables the most unfavourable climate conditions to be examined. This scenario would be affected exclusively by physical hazards.

The results of the analysis of these scenarios projected over a 5-year time horizon reveal the following possible impacts on the business:

- First, an increased claims ratio in the traditional business of around 1% in the least unfavourable scenario and less than 5% in the worst-case scenario.
- Secondly, a possible negative impact on the equity valuation of around 10% and a possible negative impact on the fixed income valuation of around 1% in the SSP1-RCP2.6 scenario.

## Climate change management

2-23

As part of its general risk management and control model, the Group develops regular risk identification and assessment processes, including climate change risk. This allows it to identify material risks that could have a negative impact on its risk profile and to actively manage them ahead of time.

These processes are updated at least once a year in order to identify the Group's key vulnerabilities and opportunities with a forward-looking view, and cover all types of risks faced by the Group in its day-to-day operations, including climate change risks. The Group's risk appetite level, approved by the Board of Directors, determines the risk levels the Group is willing to assume to reach its goals.

The management, measurement and monitoring of climate change risks is outlined in the Climate Change and Environment Policy, as well as in the Group's other governance policies, according to which:

- The impacts of these risks, to the extent that they are relevant, are analysed in the financial planning in order to adapt the strategic planning, if necessary, taking into account the risks identified.
- It implements the metrics necessary that help to measure and manage risks and opportunities derived from climate change.
- Regular reporting is carried out to the highest level on the quantification of the main risks to which the Group is exposed and the capital resources available to deal with them, as well as information regarding the fulfilment of the limits established in the risk appetite.

In order to better manage risks, internal controls on ESG risks have been rolled out. These include the annual update of the Group's ESG risk map and Sustainability-related Policies, such as the Climate Change and Environment Policy.

## Metrics and goals

305-1, 305-2, 305-3

GCO calculates Scope 1 and 2 emissions and some Scope 3 emission categories. The conversion factors used for the calculation are as indicated by:

- Department for Environment, Food and Rural Affairs (DEFRA)
- International Energy Agency (IEA)

| Emissions* | 2022 | 2023 |
|---|---|---|
| Scope 1 (Tn $CO_2$) | 491.7 | 20,786.8 |
| Scope 2 (Tn $CO_2$) | 2,394.0 | 2,151.7 |
| **Total Scope 1 and 2** | | |
| Scope 3 (Tn $CO_2$) | 3,298.0 | 9,876.3 |
| -Purchased goods and services (paper and coffins) | 285.7 | 202.9 |
| -Fuel and electricity activities (not included in Scope 1 and 2) | 985.7 | 5,404.0 |
| -Business travel (rail, air) | 2,026.6 | 4,269.4 |
| **Total Scope 1, 2 and 3** | **6,183.8** | **32,814.8** |

*Emissions calculated from the reported energy consumption. Source of electricity emission factors: International Energy Agency (IEA 2023). Source of emission factors for the remaining fossil fuels and the various categories of Scope 3 Department for Environment, Food & Rural Affairs (DEFRA 2023).
Scope 1 includes own emissions from the consumption of natural gas, refrigerant gases, fuel consumption (petrol, diesel A, B and C) and own vehicle fleet. Scope 2 includes emissions generated by electricity consumed and purchased. Scope 3 includes indirect emissions from categories of purchased goods and services (paper), from activities related to fuel and electricity (not included in Scope 1 and 2) and from business travel (rail and air).
The change in the 2023 figures compared to 2022 is the result of the inclusion of emissions from the funeral business with the incorporation of Mémora into the Group in February 2023 and methodological adjustments in the calculation of Scope 1 emissions.

The Group has also calculated its exposure to sustainable activities based on the Environmental Taxonomy as at 31 December 2023. The eligibility and alignment indicators for both asset and non-life insurance premiums are included in chapter 2 under "Sustainable investment" and "Responsible products", respectively.

### Offsetting emissions

Aware of the importance of its activity on the environment, the Group's funeral business is undertaking an emissions offsetting project in collaboration with Tree-Nation, a leading international reforestation NGO.

Through this project, called *In Arboriam*, the company undertakes to plant a tree for each service performed, always with the consent of the families, in order to create a large forest paying tribute to the deceased in the name of their loved ones and contributing to their memory, while at the same time having a positive impact on the environment on a global scale.

Detailed information on the initiative can be found on the Mémora corporate website: **www.memora.es/in-arboriam.**

Through this project, in 2023 more than 22,214 trees were planted, **which means more than 5,728.6 Tn of $CO_2$** was absorbed. As a result, the Group's emissions after the offsetting would be as follows:

| Emissions | 2023 |
|---|---|
| **Total Scope 1 and 2** | **23,938.5** |
| Offsetting (Tn $CO_2$) | 5,728.6 |
| **Total Scope 1 and 2 after offsetting** | **17,209.9** |
| Scope 3 (Tn $CO_2$) | 9,876.3 |
| **Total Scope 1, 2 and 3** | **27,086.2** |

**Objectives for the transition**

GCO advocates the transition to a low-carbon and climate-friendly economy, in line with the climate objectives of the Paris Agreement. With this aim, it has a Sustainability Master Plan through which it sets climate change-related targets for the Group's various areas and businesses.

The Sustainability Master Plan 2021-2023 has culminated in implementing an environmental management system in the Group's principal buildings, enabling it to operate in line with the goals set by the Group in terms of climate change and the environment.

Additionally, with a view to involving the entire organisation in the transition, content relating to climate change and the environment has been included in the sustainability training offered to 100% of GCO employees, as well as the Group's Management Committee and Board of Directors.

With regard to investments, the Annual Sustainable Investment Plan includes GCO's climate change commitments for the year, which involve **not investing in companies in which more than 10% of their turnover is related to certain fossil fuel extraction sectors**.

Within the goals of the 2024-2026 Sustainability Master Plan, a target has been set **to measure Scope 3 emissions associated with investments, in order to set decarbonisation targets and drive decision-making**.

Furthermore, the Group seeks to ensure that the emissions associated with its underwriting portfolio gradually contribute to the common goal of a global temperature rise of no more than 1.5°C. Accordingly, GCO has set itself the **goal of reducing the emissions associated with its underwriting portfolio to net-zero by 2050**.
The Group also believes that having an ongoing dialogue with customers is key to creating a sustainable future.

In that regard, **in the credit insurance business, the Group has set itself the goal of helping its major corporate customers to diagnose their sustainability situation and to gain an understanding of how ESG factors and issues translate into credit risks**. With this in mind, during 2023, Atradius contacted 35 major customers and conducted surveys and interviews with them, resulting in a more accurate understanding of what kind of support customers need with respect to sustainability and what Atradius can do about it.

Atradius also seeks to help customers by sharing ESG knowledge gathered through external reports or self-reported data and then having an **open discussion with them about their plans to transition to a more sustainable company, while also giving them information on best practices**.

In the traditional business, GCO is committed to strengthening the bond with its customers through environmental awareness-raising and sensitisation, to support the transition towards decarbonisation of the planet.

To achieve this, the Group has set itself the goal of informing its home and auto customers about the emissions reductions that come from using sustainable practices when managing their claims. By doing so, GCO raises awareness about the importance of cutting emissions, fosters the implementation of sustainable practices and encourages the transition of its customers towards a sustainable economic model.

# Environment

3-3,302-1

GCO's day-to-day operations do not have a material impact on the environment. Nevertheless, the Group recognises the effects of its activities on the environment, mainly arising from the consumption of raw materials and energy consumption. Given the type of activity carried out, water consumption and waste management data are not deemed relevant, but efficient use of waste is encouraged.

The Group has a Climate Change and Environment Policy in which it is committed to a process of ongoing improvement in environmental performance and the fight to combat climate change, along with compliance with all environmental regulations.

To achieve this, the Group has put in place an environmental management system that follows the guidelines of the ISO 14001:2015 standard and covers all real estate asset management processes.

Several environmental initiatives are being carried out in GCO's main buildings, including the following:

- Fitting 5 new photovoltaic plants to increase energy self-consumption, joining the 9 already installed.
- Procuring electricity with a Guarantee of Origin for all the Group's buildings in Spain.
- Fostering sustainable mobility by installing 75 chargers for electric vehicles in some of the Group's most representative buildings. Parking spaces for scooters and bicycles have also been installed.
- Creating a specific communication channel with the tenants of the Group's leased buildings, to be able to channel and deal more efficiently with any queries they may have.
- Regularly monitoring energy consumption to detect deviations and optimise efficiency.
- Ongoing control of water consumption, monitoring of possible leaks and awareness-raising among staff.
- Internal and external communications on the main environmental challenges.
- Controlling waste arising from construction and refurbishment.
- Adding specific environmental clauses in tenders and in works and maintenance contracts. Additionally, in 2024 we intend to include sustainability requirements in contracts for construction materials.
- GCO is in the process of obtaining Biosphere Certification for sustainable tourism in Torre Bellesguard, a flagship building owned by GCO.
- Work is underway to implement the ISO 14001 standard in the printing activity.

The Group also took part in external environmental initiatives such as Earth Hour, the Electric Vehicle Fair and European Sustainable Mobility Week, and contributed to World Cleanup Day, in which employees from various countries volunteered to take part in clean-up campaigns on land and at sea.

In the funeral business, this environmental management system based on ISO 14001:2015 is certified by AENOR in the case of Mémora and Bureau Veritas in the case of Asistea. Furthermore, the funeral companies have the following quality and environmental certifications:

- ISO 15017:2020 (Quality in Funeral Services).
- ISO 9001:2015 (Quality Management Systems)

Similarly, in funeral service management, several environmental protection measures are taken, the most important of which are as follows:

- Use of ecological and biodegradable funeral products.
- Elimination of any polluting material before incineration and its subsequent recycling, as well as the reuse of these materials in developing countries.
- Prioritisation of local suppliers, which allows for reduced emissions.
- Plan for fitting photovoltaic panels.
- Management of crematorium ovens during cremations and servicing to optimise energy consumption.
- Recycling of metal waste generated in cremations.
- Use of organically grown flowers.
- Transport of the deceased in hybrid and electric vehicles.

Lastly, the Group does not have any liabilities, expenses, assets, provisions nor contingencies of an environmental nature that may be of any significance in relation to its assets, financial position and results.

## Sustainable use of resources

Below are the main indicators on the sustainable use of resources of the Group's main entities.

**Materials** 301-1, 301-2

In an effort to achieve efficient document management and reduce paper consumption, the implementation of electronic documentation has been promoted in business processes, including those involving the customer. Remote working has accelerated this process.

**Consumption of materials**

| | 2022 | 2023 |
|---|---|---|
| Paper consumption (kg)* | 315,623 | 227,023 |
| % recycled paper | 8% | 10% |
| Wood coffins (m3) | Not reported | 740 |

*The credit insurance business paper consumption has been calculated by extrapolating the consumption up to November, extrapolating the month of December.

Additionally, PVC-free vinyls are used in the commercial offices, printed using aqueous dispersion polymerisation. This method is free of ozone emissions and hazardous volatile pollutants.

In 2023, a project has been rolled out to digitalise the environmental signage in the Group's main buildings, with different messages that foster care for the environment through QR codes.

In the funeral business, varnishes containing synthetic solvents have been replaced by water-based varnishes in the majority of coffins produced, with a view to reducing harmful emissions in cremation services.

**Energy** 302-1

GCO encourages good energy practices among its entities, fostering the consumption of renewable energies. For example, 77% of electricity consumption in 2023 will come from renewable sources (75% in 2022).

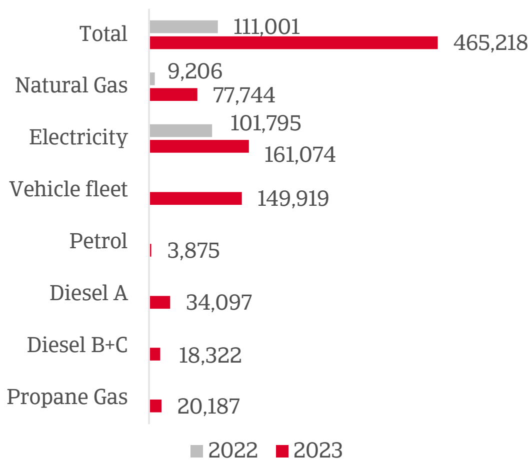
The maintenance and refurbishment of the Group's buildings are governed by energy efficiency principles, with the goal of cutting energy consumption and $CO_2$ emissions. Currently, a total of 8 buildings owned by the traditional business companies have sustainable building certificates (Leed or BREEAM) and another 6 buildings are currently undergoing the certification process.

The new works and renovations include motion detectors, automatic light intensity control and replacement of air conditioning facilities with other more energy-efficient units.

Regarding the credit insurance business, the DC Tower, where Atradius has its offices in Austria, is Leed Platinum and BREEAM certified. In addition, the Atradius building in Barcelona (Spain) is Leed Gold certified and the buildings in Namur (Belgium), Levallois-Perret (France), and Poland are BREEAM certified. The Atradius office building in Indonesia and the Atradius office in California (USA) are Leed Platinum certified.

These actions have helped to reduce energy consumption in the Group's buildings.

**Energy consumption (GJ)***




*The change in the 2023 figures compared to 2022 is the result of the inclusion of the incorporation of Mémora into the Group in February 2023 and methodological adjustments in the calculation of energy consumption.
In the traditional and funeral business, electricity and natural gas consumption has been calculated based on actual consumption up to November, extrapolating the month of December, and in the credit insurance business, consumption in November and December has been estimated.
In the vehicle fleet category, only the energy consumption corresponding to the insurance business is included. Energy consumption from the fleet of vehicles used in the funeral business is included in the categories Petrol and Diesel A.

**Key reduction measures** 3-3

With the aim of contributing to reducing consumption, the Group has launched different initiatives, among which the following stand out:

- In Spain, the Group continued to fit photovoltaic panels for self-consumption. Twilight switches have also been fitted to set switch-off times for signage and outdoor lighting in special buildings and commercial offices to cut energy consumption. Additionally, the Group has established a centralised time control system for air conditioning.

- In Portugal, a process of renovating offices has begun that will include best practices from the Leed/BREEAM principles.
- In the Atradius Denmark office building, solar panels have been fitted to help produce renewable energy for self-consumption.
- In Austria, conventional light bulbs have been replaced by LED bulbs and Free-Cooling is used for air conditioning and cooling.
- In Belgium, the "Zero Waste" initiative is being further pursued by focusing actions on the dimensions with the highest impact (waste, mobility, energy and consumables). A specific mobility programme developed between Atradius Belgium and the regional authorities has been rolled out in 2023 and is subject to annual audits by external auditors, who have now awarded it a 5-star rating. As part of the programme, employees are involved through events/challenges. New charging points for electric vehicles have also been fitted and electric bicycles are made available to employees.
- In France, work has been carried out locally to foster participation in initiatives focused on energy saving, sustainable mobility and reduction of paper consumption.
- In Norway, energy for heating is produced by a renewable source of energy reprocessing from fjord heat.
- In the United States, they have reflective blinds, thereby reducing the sun's heat and using less energy for cooling.
- In Mexico, energy-saving light bulbs and motion sensors are used for lights. Furthermore, paper and ink consumption has been substantially reduced by replacing printing processes with mailing, and electronic signatures have been implemented for policies.
- In the UK, all lights have been replaced with LED bulbs and electric blinds have been fitted to control solar heat to reduce cooling in summer. Additionally, the car fleet is being renewed favouring hybrids and all-electric cars.

## Natural Capital

Natural capital is one of the most valuable assets that communities have, providing natural resources that are crucial to the well-being of communities. The Group strongly believes that organisations have a responsibility to champion the protection of natural assets and biodiversity by advocating greener practices and in so doing, help communities manage the impacts of climate change. It recognises the crucial role of nature-based solutions in addressing the global climate crisis, raising the resilience of ecosystems and curtailing associated risks, while contributing to mitigation by strengthening ecosystem services.

### Conservation of natural capital

Given the unique nature of the funeral business, which due to its activity has a different impact on natural capital compared to the insurance business, a range of actions are undertaken to preserve biodiversity, including: reforestation, use of PEFC-certified wood, use of biodegradable products (shrouds, urns, etc.), wreaths with organically grown plants, reminders on FSC or recyclable paper, replacement of the fleet with hybrid vehicles and monitoring of emissions and inspections at the facilities.

Furthermore, the facilities and the activity do not have an impact on biodiversity conservation, given that the centres are located outside protected areas and the environmental licences are in place to carry out the activity.

At Mémora's coffin factory, as a preservation measure, we choose to buy pieces of wood of different sizes to build the different models of coffins, adjusted as far as possible to the production to avoid wasting wood. The sawdust produced in the production process is used for combustion in the biomass boiler that produces part of the energy used.

Conservation measures are also taken at the crematoria: the environment and the distances to the various protected sites in the area are included in the monitoring reports.

### Recovery of natural capital

GCO is one of the companies comprising Nactiva Capital Natural S.L., a collective platform for investment in natural capital. Natural capital is the quest for productive investment opportunities in environmental areas to drive growth while protecting the planet and combating climate change.

Nactiva is the first initiative of its kind in the European Union and its goal is to drive projects in the Mediterranean area, taking advantage of the opportunities offered by nature and integrating and connecting various social and economic agents with a view to maximising the scope and capacity of the projects to protect and regenerate natural capital.
The projects are geared towards protecting forests, land, coastline and water.

In turn, Nactiva has taken on an awareness-raising role by participating in roundtables and podcasts, and through social media and e-newspaper outreach.

**Nactiva Forests**

Nactiva forests is one of the initiatives in which GCO is currently involved, which is dedicated to supporting projects for the protection, sustainable forest management and regeneration of Mediterranean forests, ensuring their conservation and beneficial use for communities and the environment.

The initiative is built on the understanding that forests play a crucial role in climate change mitigation, given that they are natural carbon sinks that, through photosynthesis, absorb CO2 and return oxygen to the atmosphere.

Among the impacts expected to be gained in the form of benefits are the mitigation of fires, thereby lessening the risk of loss of forest areas, the preservation of biodiversity, the capture of forest products for sale, improvement in the quality of life of local residents and the offsetting of emissions.

# Ethics and compliance

2-23, 2-25, 2-26, 3-3

GCO has procedures and a framework in place to ensure the adequacy and compliance with its obligations, both internally and externally.  Indicated below are the Group's main policies, whose description and results are set out throughout this Report.

| Group compliance policies 3-3 | Location |
|---|---|
| Code of Ethics | Corporate website |
| Sustainable Investment Policy | Corporate website |
| Climate Change and Environment Policy | Corporate website |
| Human Resources Policy | Corporate website |
| Corporate Tax Policy | Corporate website |
| Sustainability Policy | Corporate website |
| Business Continuity Policy | Internal |
| Investment Policy | Internal |
| Reinsurance Policy | Internal |
| Underwriting Risk, Provisioning Risk and Claims Management Policy | Internal |
| Policy on diversity in the composition of the Board of Directors and the selection of Board members | Corporate website |
| Policy on the Disclosure of Economic-Financial, Non-Financial and Corporate Information and on Contact With Shareholders, Investors and Voting Advisers | Corporate website |
| Reputational risk management protocol | Internal |
| ORSA Policy | Internal |
| Capital Management Policy | Internal |
| Policy on Fitness and Good Repute | Internal |
| Internal Supervision Policy | Internal |
| Risk Management System Policy | Internal |
| Internal Auditing Policy | Internal |
| Verification of Compliance Policy | Internal |
| Remuneration policy | Internal |
| Right to Disconnect From Work Policy | Internal |
| Outsourcing policy | Internal |

## Code of Ethics

The Group's Code of Ethics, formulated and approved by the Board of Directors, is the document that lays down the guidelines that must govern the ethical behaviour of the directors, employees, agents and associates of GCO in their daily performance with regard to their relations and interactions with all stakeholders.

The Code of Ethics is distributed to all staff, agents and associates through the intranet of each of the Group's entities and must be read and accepted by all persons working in the Group. This code can be viewed on the Group's corporate website: **www.gco.com**.

In January 2021, the Code of Ethics was updated to bring it into line with the new realities facing the Group and includes the commitments undertaken in the fields of human rights, sustainability, good governance, professional development, regulatory compliance and equal opportunities, along with other improvements. It has subsequently been renewed on several occasions; the latest version being dated November 2023.

Both Atradius and the companies in the funeral business, given the uniqueness of their structure and business, have also their own code of conduct, which observes the guidelines defined in the Group's Code of Ethics.

**Respect for human rights** 3-3, 408-1, 409-1

As laid down in the Code of Ethics and the Human Resources Policy approved by the Board of Directors, the Group supports, respects and contributes to the protection of internationally acknowledged fundamental human rights. The Group makes every effort not to be an accomplice in any form of abuse or violation of human rights among its stakeholders and undertakes to defend their compliance in all its activities and in the geographical areas where it operates.

Respect for human rights is a responsibility of all persons and entities to which the Group's Code of Ethics applies. Along with other basic standards of behaviour, the Group adheres to the Universal Declaration of Human Rights, as well as the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and Conventions and the OECD Guidelines for Multinational Enterprises.

In this regard, all of the Group's traditional and funeral business is carried out in Spain and the Principality of Andorra, where child labour and forced labour are subject to intense scrutiny by the labour authorities. The Group's insurance, reinsurance, management and funeral companies all adhere to the legislation in force and it has not been necessary to include special mechanisms to prevent such breaches. Equally, in the value chain of the insurance entities, practically all their suppliers are national or from jurisdictions in which the same standards apply, meaning that it has not been necessary to apply additional measures.

As regards the credit insurance business, Atradius also has its own Declaration of Human Rights with the purpose of adapting it to the provisions of the Universal Declaration of Human Rights of the United Nations and in accordance with the principles and values of the Group's Code of Ethics.

In 2023, as in the previous year, there were no substantiated complaints of human rights violations across the Group. Discrimination complaints are covered under the sub-section Respect for and safeguarding of human rights in the section General principles and values of the Group's Code of Ethics.

## Whistleblowing channel

2-25, 205-3, 406-1

The Group has a confidential whistleblowing channel, which is accessible via the Group's website, 24 hours a day, 7 days a week, enabling employees and any interested third party to report, confidentially and anonymously, queries and/or possible breaches of the Code of Ethics, of any other internal regulations or policies of the Group, as well as actions or omissions that may result in a criminally punishable irregularity or the manipulation and/or falsification of financial data.

Once the report is received, it is handled by Corporate Internal Audit as established in the document "Whistleblowing and fraud reporting channel" and its implementing regulations “Procedure and methodology of action for the analysis of irregularities and internal fraud of GCO”.

During 2023, the Group has received 92 communications through the existing whistleblowing channels, of which 15 were not accepted for processing. Of the remaining 77 communications, 68 have been resolved during 2023 (41 substantiated cases and 27 unsubstantiated) and 9 are pending resolution as of December 31, 2023 (in 2022, 69 communications were received through the existing whistleblowing channels).

## Verification of compliance

3-3, 2-16

Operating in a highly regulated sector means that a compliance verification function is crucial. This essential function and second line of defence is dedicated to ensuring compliance with the obligations that affect the organisation, including both mandatory and voluntary regulations, assessing the potential impact of any changes in the legal environment on the Group's operations and the identification and assessment of compliance risk. It also includes advising the Group's Board of Directors and all other individual companies forming it about compliance with the legal, regulatory and administrative provisions affecting the Group, as well as compliance with internal regulations.

The compliance verification function is managed by GCO's Compliance Verification Committee, the main function of which is to coordinate, supervise and establish common criteria for all the Group's regulated entities with regard to the application of both mandatory and voluntary regulations.

It is also entrusted with ensuring compliance with the internal regulations developed regarding the system for the prevention and detection of crimes that may be committed by the Group's legal entities. Atradius has its own structure comprising both the compliance function at entity level and local compliance duties. It supports the Company in complying with the applicable laws, rules and regulations.

## Prevention of money laundering and the financing of terrorism

2-16

The Group has a manual for the prevention of money laundering and the financing of terrorism which outlines, among other topics, all internal control measures implemented by the Group's entities subject to the regulations on the prevention of money laundering and the financing of terrorism. These systems are subject to an annual analysis by an external expert who draws up a report and who, in 2023, found the Group to have a satisfactory system for the prevention of money laundering and terrorist financing. The Board of Directors assesses this report together with proposals for actions to remedy the shortcomings identified and implement improvements.

In 2023, no money laundering reports have been received. As part of the prevention system and with a view to fostering a culture of compliance within the organisation, the Group has implemented a training plan on the prevention of money laundering and the financing of terrorism.

Furthermore, the Group has a Corporate Governance Framework on the prevention of money laundering and terrorist financing published on the corporate website with the aim of fostering transparency and contributing to stakeholder confidence.

## Personal data protection and cybersecurity

3-3, 418-1

The Group is committed to guaranteeing the confidence of its stakeholders with regard to the protection, processing and privacy of personal data. In that regard, the Privacy and Personal Data Protection Policies, and the use of ICT Resources, are intended to establish the Group's goals in this field and to lay down a working framework to guarantee and improve such protection.

The Group also has a Corporate Governance Framework on personal data protection and information security available on the corporate website, which outlines the commitments and principles being promoted and the organisational structure in this area. As a result of the foregoing, GCO has undertaken to process the personal data of the natural persons pursuant to the following principles:

- **Lawfulness, fairness and transparency** in the processing of the personal data of data subjects, obtaining such data by lawful and transparent methods, clearly informing them of their subsequent processing, and with the explicit consent of the data subject where necessary.
- **Purpose limitation:** personal data will be gathered and processed for specific, explicit and legitimate purposes, pursuant to the purpose and aim informed to the data subject at the time of obtaining the data.
- **Data minimisation**: the processing of personal data will be adequate, relevant and limited to what is strictly necessary for the purposes for which they were collected.
- **Accuracy:** the personal data processed must be accurate and kept up to date, and inaccurate data must be deleted or rectified.
- **Limitation of the retention period**: the personal data undergoing processing will be kept for the time necessary for the purposes for which they were collected.
- **Integrity and confidentiality**: personal data will be processed with appropriate security and protection against unauthorised or unlawful processing, loss or destruction.
- **Proactive responsibility and accountability**: not only should compliance with the above principles relating to the processing of their personal data be ensured, but this must also be susceptible to being proven.

In order to guarantee the security and reliability of the information, the Group has internal control procedures over the information systems and the Corporate Information Security Policy, which is brought into line with the information systems security guidelines defined under ISO/IEC 27001 and NIST standards, which lay down an internationally recognised security reference framework.

Similarly, with the aim of ensuring compliance with the applicable regulations on personal data protection, the Group has a data protection officer (certified in accordance with the DPO Certification Scheme of the Spanish Data Protection Agency —AEPD). It also has a Personal Data Protection Committee, as the executive body responsible for applying the regulations on personal data protection and the use of information and communication technology resources.

In the case of the credit insurance business, it also has a Personal Data Protection Advisory Committee, which comprises its data protection officer and the directors of various business units and, in each of the countries in which it does business, there is a representative to ensure compliance with the applicable personal data protection regulations in those regions.

Furthermore, given that potential cyber-attacks are considered one of the main risks in the sector, the Group also has a Chief Information Security Officer with the duties of coordinating and controlling the technical security measures of the Group's information systems required by the General Data Protection Regulation. Similarly, for the credit insurance business, the Group has its own Chief Information Security Officer.

In 2023, the Group did not receive any substantiated complaints relating to breaches of customer privacy received by third parties (0 complaints in 2022) and 2 requests were received from regulatory authorities (4 complaints in 2022) which have been rejected by the AEPD. Moreover, no cases of leaks, theft or loss of customer data have been identified.

Similarly, in 2023 there were only 1 cybersecurity incident (1 incident in 2022) and no security breach affecting personal data (no breach in 2022) at GCO.

In the event of an attack on GCO's cybersecurity, there is a Business Continuity Policy and a Contingency Plan that includes the guidelines to be followed by the Group in the worst case scenario. GCO also has an incident response plan that sets out the actions to be taken by the staff depending on the incident and its severity. In turn, employees are provided with mandatory training to prevent attacks, as well as mechanisms for reporting a cybersecurity incident or suspicion that one has occurred.

In 2023, 6,851 hours of data protection and cybersecurity training were provided (3,735 hours in 2022).

Finally, Internal Corporate Audit has included in the Multi-Year Plan the conducting internal and external audits of GCO's technological environment are conducted annually to ensure compliance with regulations and strengthen cybersecurity. The results of these audits are submitted to the Audit Committee and the Board of Directors. In 2023 the following audits have been carried out: (i) external audit developed by KPMG Asesores, S.L. of review of the recommendations of the 2021 audit, (ii) external audit carried out by KPMG Asesores S.L. of the management of the IT patching and upgrades and (iii) audit carried out by KPMG Asesores, S.L. on the exercise of a mock crisis management exercise in the event of a cybersecurity incident.

## Fight against fraud, corruption and bribery

205-2, 205-3

In order to prevent corruption and bribery, the Group undertakes to perform all its activities in accordance with the legislation in force in all scopes of action and in all countries in which it operates. To do this, it has a Crime Prevention Model that includes the measures taken to prevent corruption and bribery. As part of this model, the Group has a map of criminal risks and with controls to reduce compliance risks.

Additionally, the Group has internal regulations that develop the Code of Ethics: the Protocol of the person responsible for criminal compliance, the whistleblowing channel for irregularities and fraud, the procedure and methodology for analysing irregularities and internal fraud, the protocol for detecting conflicts of interest with public sector entities, the protocol for action when receiving judicial documentation, the protocol for action in the event of receiving an inspection or a request for information, and the manual of procedures for selecting suppliers. It uses these documents to structure the Criminal Prevention Model and the mechanisms for breaching the Group's Code of Ethics.

In order to improve understanding of criminal risks and the actions and conduct expected of employees, the Group has training courses on the prevention of criminal liability of legal persons and on market abuse and insider information (course on the Group's code of conduct), with 1,323 employees having received training on these subjects in 2023 (3,582 employees in 2022).

During 2023, as in the previous year, no cases of corruption were detected in the Group. Furthermore, no public legal cases related to corruption have been recorded.

The Group has anti-fraud procedures in place to help identify possible malicious acts or omissions in the taking out of insurance, in the reporting of claims or in the substantiation of damages, which are intended for the purpose of improper gain, money laundering or terrorist financing or unjust enrichment. In that regard, 67 incidents of internal fraud were detected in 2023, with an operational cost* of 201,378 euros for contracting, claims and others (in 2022, 48 incidents of internal fraud were detected, amounting to 352,343 euros).

*Operational Cost is understood as the real financial damage that fraudulent practices constituting internal fraud have caused to the organisation.

### Anti-corruption training by professional category 205-2

| | 2022 | | 2023 | |
|---|---|---|---|---|
| | No. employees | % | No. employees | % |
| Administrative support | 426 | 44% | 451 | 20% |
| Qualif. admin. and sales staff | 2,463 | 54% | 732 | 16% |
| Middle management and technical supervision | 651 | 42% | 130 | 7% |
| Senior management | 42 | 32% | 10 | 6% |
| **Total** | **3,582** | **50%** | **1,323** | **15%** |

### Anti-corruption training by country 205-2

| | 2022 | | 2023 | |
|---|---|---|---|---|
| | No. employees | % | No. employees | % |
| Spain | 728 | 17% | 656 | 12% |
| Netherlands | 434 | 99% | 51 | 11% |
| Germany | 469 | 100% | 23 | 5% |
| United Kingdom | 328 | 100% | 308 | 93% |
| Belgium | 219 | 100% | 20 | 9% |
| France | 225 | 100% | 25 | 11% |
| Italy | 203 | 100% | 14 | 7% |
| United States | 126 | 100% | 121 | 90% |
| Denmark | 74 | 100% | 7 | 9% |
| Mexico | 71 | 59% | 5 | 4% |
| Australia | 63 | 100% | 3 | 5% |
| Portugal | 91 | 97% | 8 | 2% |
| Poland | 48 | 100% | 8 | 15% |
| Hong Kong | 29 | 67% | 4 | 9% |
| China | 39 | 100% | 3 | 8% |
| Singapore | 41 | 100% | 3 | 7% |
| Ireland | 38 | 100% | 10 | 26% |
| Rest of the World | 356 | 100% | 54 | 14% |
| **Total** | **3,582** | **50%** | **1,323** | **15%** |

# Fiscal transparency

3-3

The Group has a corporate tax policy, the purpose of which is to describe the strategy for complying with its tax obligations in all countries and territories in which it conducts business, as well as to maintain an appropriate relationship with the relevant tax administrations. This policy is reviewed every year by the Board of Directors of the Company and was last updated in January 2024.

Prior to the drawing up of the annual accounts and the filing of the corporation tax return, the person responsible for tax matters in the Group informs the Board of Directors about the tax-related strategies deployed during the financial year and the degree of compliance with the policy.

The Group promotes transparent, clear and responsible communication of its main financial figures, by providing its different stakeholders with information concerning the payment of all taxes that are applicable in each of the jurisdictions in which it is present.

In 2023, the amount accrued for corporate income tax totals 183 million euros (154.6 million euros in 2022).

**Tax information. Profit and taxes obtained by geographical areas** 3-3

| (figures in millions of euros) | 2022 | | | 2023 | | |
|---|---|---|---|---|---|---|
| | Profit | Tax accrued | Tax paid | Profit | Tax accrued | Tax paid |
| Spain | 364.1 | 70.4 | 105.4 | 392.1 | 82.5 | 133.5 |
| Netherlands | -68.5 | -12.5 | 0.2 | 18.2 | 5.8 | -1.2 |
| Germany | 72.0 | 23.7 | 4.7 | 81.9 | 27.3 | 7.1 |
| United Kingdom | 36.9 | 7.7 | 5.5 | 29.4 | 7.0 | 8.5 |
| Belgium | 23.9 | 7.1 | 9.2 | 35.9 | 9.1 | 6.9 |
| France | 23.0 | 5.8 | 2.7 | 33.3 | 8.7 | 8.7 |
| Italy | 35.2 | 11.0 | 2.0 | 37.0 | 7.0 | 8.2 |
| United States | 27.4 | 6.0 | 7.0 | 18.5 | 4.2 | 4.9 |
| Denmark | 4.2 | 0.9 | 1.8 | 10.5 | 2.3 | 0.2 |
| Australia | 14.1 | 4.3 | 9.8 | 9.9 | 3.0 | 5.9 |
| Portugal | - | - | - | 7.0 | 2.6 | 3.1 |
| Hong Kong | 12.9 | -0.3 | 1.0 | 18.5 | 2.8 | 0.0 |
| Ireland | 107.0 | 13.4 | 1.2 | 42.9 | 5.0 | 18.4 |
| Greece | 5.0 | 1.1 | 1.4 | 5.8 | 1.3 | 1.3 |
| Norway | 5.2 | 1.3 | 0.8 | 7.1 | 1.8 | 1.6 |
| Russia | -21.8 | 0.0 | 2.6 | 2.7 | 0.1 | 0.4 |
| Switzerland | 11.3 | 2.2 | 2.3 | 7.4 | 1.4 | 1.3 |
| Rest of Europe | 20.7 | 5.3 | 4.6 | 22.1 | 2.8 | 4.9 |
| Rest of OECD | 19.5 | 5.8 | 4.6 | 14.5 | 4.5 | 3.9 |
| Rest of the World | 5.1 | 1.4 | 1.7 | 3.5 | 3.8 | 2.9 |
| **Total** | **697.2** | **154.6** | **168.5** | **798.2** | **183.0** | **220.5** |
| Consolidation adjustments foreign business | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| **Total** | **697.2** | **154.6** | **168.5** | **798.2** | **183.0** | **220.5** |

Paid tax corresponds to the amounts actually paid or received in concept of corporation tax during the financial period and includes payments on account and withholdings on the current year, as well as final settlements and returns from previous periods. For its part, accrued tax corresponds to the tax expenses recorded at the close of the financial period in relation to the profit obtained for that period. Lastly, Profit corresponds to pre-tax profit. Adjustments for foreign business have been recorded under their corresponding country.

# Social impact

3-3, 203-2, 413-1

The Group bases its business model on respect for people and on contributing positively to the environment and its stakeholders. The commitment undertaken with the communities in which it operates has been linked to economic development, well-being and quality employment for more than a century.

GCO has received the **2023 Family Company Award** in recognition of its business trajectory, the creation of value and family continuity.

**Economic value generated and distributed** 201-1

| (figures in millions of euros) | | | 2022 | 2023 |
|---|---|---|---|---|
| Economic value distributed | | | 4,110.6 | 4,987.1 |
| | Customers | Payment of the insured benefits upon occurrence of the damage or eventuality foreseen in the insurance contracts. | 2,306.9 | 2,992.3 |
| | Public administrations | Payment of taxes (social security contributions, corporate income tax, surcharges levied and input VAT. | 582.8 | 646.3 |
| | Intermediaries | Payment of commissions to agents and brokers for services provided. | 588.9 | 643.3 |
| | Employees | Staff expenses (salaries, employee benefits, training, etc.). | 513.1 | 576.2 |
| | Shareholders | Dividends paid by the Group to shareholders. | 116.6 | 126.6 |
| | Foundations and non-profit organisations | Contributions of Group companies made to foundations and non-profit organisations. | 2.3 | 2.4 |
| Economic value retained | | | 65.2 | 67.5 |
| **Direct economic value generated** | | | **4,175.8** | **5,054.6** |

The direct economic value generated by the Group responds to the sum of the distributed value and the value retained.

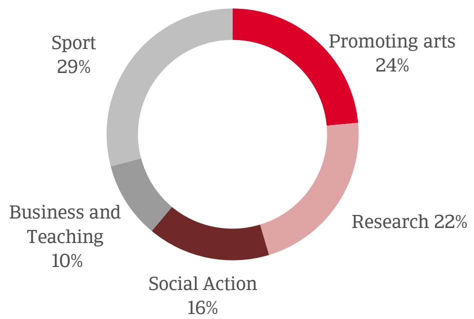
In parallel, its social action is organised through its two foundations, Fundación Occident and Fundación Mémora.

## Fundación Occident

The GCO Foundation, which changed its name to Fundación Occident, is a private non-profit organisation created in memory of Jesús Serra Santamans, GCO's founder, whose purpose is to implement projects with the goal of making a better society for everyone, always guided by values such as solidarity, effort and teamwork.

At present, the Foundation provides support and drives initiatives in research, business and teaching, social action, sport and the promotion of the arts.

**Distribution of the contribution of Fundación Occident in the different lines of action 2023:**



Fundación Occident approves its action plan each year, detailing all the activities to be carried out, their potential beneficiaries and the necessary human and material resources. A formal protocol is available to ensure objectivity, specifying the criteria for selecting the proposed initiatives and programmes. The project valuation committee is the responsible body. Through bi-monthly meetings, they select the set of new projects and assess the status of ongoing projects, among other duties. These projects and initiatives include participation programmes, impact assessment and development programmes.

In 2023, Fundación Occident has been awarded the **IMPULSA CULTURA Seal**, which acknowledges its values and its great work to foster cultural projects and actions with a major positive impact on society.

A good example of these projects is the Foundation's collaboration with UNHCR, the UN refugee agency, with which it has been working since 2021 on various programmes to help displaced young people.

Another initiative worth highlighting is the partnership with the Tomando Conciencia Schools project. This is a programme to encourage healthy habits in public schools. This programme consists of several lessons and challenges that take place at different schools, with the goal of promoting healthy habits in children aged 10 to 12. The activities are conducted through interactive digital content covering various topics such as healthy eating, respect for the environment, daily activity and communicating and expressing emotions.

Furthermore, through the Fundación Occident scholarships and agreements with the various business schools, universities and organisations dedicated to this purpose, students with a good academic record and aptitude for training, but with an insufficient income per family unit to be able to afford this type of studies, are offered the possibility of undertaking qualified higher studies. These grants safeguard the principle of equal opportunities. The initiative is being carried out in Spain and also in international cooperation in Kenya or refugee camps with displaced persons, channelling this aid with the United Nations Agency for Refugees (UNHCR).

Furthermore, Fundación Occident works with other entities such as the Spanish National Cancer Research Centre (CNIO), the National Centre for Cardiovascular Research (CNIC), the Canary Islands Astrophysics Institute (IAC), the Spanish National Research Council (CSIC), the Interhospital Foundation for Cardiovascular Research (FIC), the Spanish Foundation for Science and Technology (Fecyt), Save the Children, Doctors without Borders, Manos Unidas and Save the Med Foundation.

In 2022, Fundación Occident joined the Foundations for Climate pact, which advocates an active fight to tackle the climate crisis, with the goal of being able to lead a task force for the insurance sector. It also drives the Changemakers at Sea project in partnership with the Save the Med Foundation, which aims to cut down on the use of single-use plastic through solutions based on the three most important R's (Refuse, Reduce and Reuse).

With regard to research, in 2023 Fundación Occident financed a pilot study on the early detection and screening of cardiovascular risk prevalence in 4 health areas in the Community of Madrid, with highly satisfactory results and evident scalability.

Fundación Occident also undertakes actions geared towards financial inclusion with the goal of training those people with difficulties in developing their economic capacity. A training and job placement project for people with disabilities is carried out in the form of workshops and conferences, the participants will learn strategy, the keys of entrepreneurship, marketing, finances, the legal and regulatory aspects and people management, among other areas. The Foundation also runs a training plan for young Kenyan women with limited economic resources, providing them with access to secondary education and a trade.

In the area of Promoting the Arts, there was a notable increase in the number of actions and beneficiaries in 2023 in the Poetízate, poetry in the classroom programme, which seeks to present poetry in a friendly and attractive way to provide adolescents with more communicative and expressive tools.

In 2023, through Fundación Occident, GCO undertook a total of 34 social projects (35 projects in 2022).

**Contribution of Fundación Occident to social projects:**


In the coming years, GCO is committed to raise its contribution to Fundación Occident in order to step up its social action efforts.

## Fundación Mémora

Fundación Mémora was created in 2016 with the goal of improving society through the knowledge and experiences acquired by Mémora throughout its journey.

Its mission is to provide help to society, supporting and enhancing the care of people and families in the process of the end of their lives and the professionals who are involved taking care of them.

The action undertaken by Fundación Mémora is based on four pillars: awareness-raising, training, research and innovation, and social action.

The first area is geared towards raising awareness and sensitisation, publicising strategies for active and healthy ageing, and training people to face death as the final part of life. For this purpose, in different cities, the Aulas Mémora are held. These are a series of outreach sessions in the form of conferences, workshops, concerts, etc., intended for the general population and, especially, for the elderly, caregivers and health personnel.

Secondly, the Foundation has the will to be a benchmark entity in the training of professionals in the fields of health, social and health care and social services. The Foundation offers a broad range of training (courses, conferences, seminars and cycles) and is acknowledged as an organiser of accredited continuing education activities for professionals in the healthcare field. In 2023, a new accredited online course on Advance Directives (Advance Directives) has been launched in agreement with the Barcelona College of Doctors and the Luzon Foundation.

Another of its goals is to be a benchmark for all those involved in the end-of-life cycle. In particular, for professionals involved in palliative care services in aspects of improving care for patients and their families. In order to liaise with professionals in the fields of patient care, projects are run in conjunction with the research institutes of the centres. Some of the projects carried out in 2023 are Music Therapy, Art Therapy and End of Life Management.

Lastly, various social action programmes have been undertaken, creating spaces of support for families, professionals and volunteers, which include psychological support for bereavement, offering services such as: a helpline with specialised psychologists 24 hours a day, 365 days a year, support from the web community Your Network Support and in-person psychological care, both individual and group.

Fundación Mémora is aware that society must review how it cares for its elderly, and in 2019 it presented a social reflection project called Caring Cities. This project stems from the need for cities to develop a new model of care that enables the creation and deployment of services that guarantee the quality of care and support for the elderly. These cities will be able to have a broad and cross-cutting approach to structuring and responding to the needs arising from population ageing, placing special emphasis on attending to the end-of-life process, focusing on preventing death in situations of vulnerability and unwanted loneliness.

A city model is being structured that is based on bringing care for the elderly to the centre of all the policies deployed in the municipalities (a pilot project has been worked on with Logroño City Council).

In 2023, Fundación Mémora has earmarked 410,407.4 euros to a total of 476 social projects.

## Commitments of the Group's companies

2-28

GCO is committed to a sponsorship strategy that drives sport, social integration and sustainability in general. Thus, in 2023, the Group's companies have entered into various collaboration agreements, including the following:

- The Fair Saturday movement has been sponsored, which undertakes activities linked to art and culture for the benefit of social causes.
- In support of adapted sports, the Copa del Rey wheelchair basketball tournament was sponsored, as part of a commitment to the Spanish Sports Federation for the Physically Disabled.
- In support of sport and a healthy lifestyle, the Bilbao-Bilbao Cycle Tour has been sponsored.
- It also partnered the DaleCandela Charity Festival with the goal of raising the profile of ALS sufferers and their carers in the Basque Country.
- Atradius has supported non-profit organisations such as Oxfam Novib to back the training of entrepreneurs in third world countries and Youth Off the Streets, which through its services and programmes gives young people security, support and opportunities to build a positive future.

The Group also continued its commitment to sponsorship agreements linked to sport, music and culture. In that regard, it renewed its collaboration agreement with the Starlite Festival, which has been renamed Starlite Occident, and also sponsored its first edition in Madrid, Christmas by Starlite. It also began sponsoring the Occident Summerfest Cerdanya festival.

With regard to the promotion of sport, in 2023 the Group sponsored the Conde de Godó tennis trophy, the Baqueira/Beret ski resort and the Era Escòla school.

In total, the amount allocated by the Group to sponsorship projects in 2023 amounted to 4.0 million euros (3.5 million euros in 2022). Additionally, the Group is involved in partnership actions with UNESPA, ICEA, the Valle de Arán Ski School and the Real Club Tenis of Barcelona. In 2023, the amount of these partnership actions totals 2.0 million euros (1.2 million euros in 2022).

GCO is also involved in the consultation processes of industry and business associations in order to obtain a more holistic view of common challenges and to jointly advance the sustainability of the insurance industry. The expenditure allocated to business association activities in 2023 is 536,099 euros (287,431 euros in 2022), with the largest contribution corresponding to UNESPA, which is in charge of representing insurance in Spain on issues of current concern to society.

## Social action and corporate volunteering

**GCO channels the charitable concerns of its employees through corporate volunteering and generates a culture of collaboration and support among its staff for other social groups in need**.

In 2023, corporate volunteering initiatives continued to be rolled out in the Group's companies, including the following:

- CHEERS4U: recreational training featuring Group employees with the aim of learning how to interact with and teach new skills to people with intellectual disabilities.
- Junior Achievement: in partnership with Unespa, Group employees gave training sessions in schools to encourage financial education.
- World Cleanup Day: Group volunteers from various countries took part in clean-up and litter collection campaigns, both on land and at sea, for World Cleanup Day.
- Fundación Prevent: mentoring for entrepreneurs with disabilities who receive training at ESADE to assess and enhance their business plan or grants for higher education for students with disabilities for their inclusion in the labour market.
- Fundación Exit: volunteering, the aim of which is to combat school failure and prevent students from dropping out of school at an early age. Each volunteer acts as a coach and accompanies a young person, aged between 16 and 19, in defining a personal/professional goal, as well as guiding them in the steps to take to achieve it.
- Horizons 2023 workshops: the Prepersa team assembled a total of 15 bicycles that were donated to the MAGONE Foundation, which will be donated to children at risk of social exclusion.

In addition, in 2023 the credit insurance business has undertaken a total of 31 initiatives to contribute to social action locally (22 initiatives in 2022) with a contribution of more than €50,807 (€108,721 in 2022).

Actions included the collection of donations for various causes, such as Atradius France's participation in "Les foulées de l'assurance" to raise funds for the prevention of cardiovascular diseases, Atradius NL's participation in the Amsterdam City Swim to raise funds for ALS, and the participation in the Race for de Cure in Milan, Rome and Greece, a sporting event to raise funds for the fight against breast cancer. Similarly, in 2023, clothing was collected in response to the earthquake catastrophe in Turkey and Syria, and computer equipment was donated in Vietnam.

## Contribution to the SDGs

3-3

The approval by the UN's General Assembly of the 2030 Agenda for Sustainable Development and with this the Sustainable Development Goals (SDG) entails the commitment of governments as well as civil society and companies to contribute to their achievement. The activities undertaken by GCO and the work carried out by Fundación Occident enable us to contribute to several of the United Nations Sustainable Development Goals.

### 1 NO POVERTY

- ✓ More than €63,600 donated to educational accompaniment, emotional support and nutrition programmes with Save the Children and Fundación Balia
- ✓ €22,385 donated to food banks

### 4 QUALITY EDUCATION

- ✓ 23 hours of training per employee
- ✓ 11% of Fundación Occident's contributions are earmarked for teaching projects
- ✓ More than €93,500 allocated to grants for young people with low family incomes in secondary and higher education centres of reference
- ✓ More than 100.000€ allocated to grants for young people at high risk of vulnerability for their academic and professional training, as well as the development of educational facilities in international cooperation

### 8 DECENT WORK AND ECONOMIC GROWTH

- ✓ More than 8,000 employees
- ✓ 116 employees with a disability
- ✓ 5,217 employees teleworking
- ✓ 97% permanent contracts
- ✓ 850 new hires
- ✓ Turnover rate of 10%
- ✓ 183 million euros accrued in corporate income tax

### 11 SUSTAINABLE CITIES AND COMMUNITIES

- ✓ Range of products and services with environmental coverage
- ✓ Offices with Leed energy rating
- ✓ Photovoltaic plate installation project at the main buildings

### 17 PARTNERSHIPS FOR THE GOALS

- ✓ Principles for Sustainable Insurance (PSI)
- ✓ Principles for Responsible Investment (PRI) United Nations Global Compact

### 3 GOOD HEALTH AND WELL-BEING

- ✓ 1,842 days lost
- ✓ No occupational illness
- ✓ €90,000 donated for training and maternal intervention in international cooperation
- ✓ 905 students trained in healthy habits through the Tomando Conciencia Schools programme
- ✓ Employee well-being programme: mental health workshops
- ✓ More than €466,000 earmarked for R&D&I projects relating to oncological, cardiovascular and dietary diseases
- ✓ Accompaniment in hospital centres for children with difficulty in diagnosis

### 5 GENDER EQUALITY

- ✓ 53% of employees are men and 47% are women
- ✓ Member of the EWI Network, which promotes the presence of women in the management of insurance companies

### 10 REDUCED INEQUALITIES

- ✓ Grants for job training and entrepreneurship programmes for people at risk of exclusion (disability and/or high vulnerability). 1084 hours of corporate volunteering.
- ✓ Adapted skiing and sailing sports programmes for young people with disabilities: 380 people took part
- ✓ 118 grants in musical and piano training for children in situations of exclusion

### 13 CLIMATE ACTION

- ✓ Cleanup Day volunteering, involving cleaning and litter collection campaigns both on land and at sea
- ✓ 57,099.81 allocated to environmental education for school children

### 16 PEACE, JUSTICE AND STRONG INSTITUTIONS

- ✓ No confirmed case of corruption
- ✓ 2.4 million euros allocated to contributions and non-profit organisations

# Innovation

3-3

The Group considers that a culture that embraces change and at the same time encourages and motivates its employees to innovate is the fundamental cornerstone to be able to adapt the offer of products and services to the needs of all types of customers. In 2023, the Group invested 95.1 million euros in innovation (81.5 million euros in 2022) and in 47 R&D&I projects (47 projects in 2022).

## Xplora Programme

Xplora is the intrapreneurship programme of the Group's traditional business companies, which assists the organisation to understand, take ownership of and enthusiastically foster an innovative corporate culture. This programme brings together training in innovation and a platform designed to enable employees to propose ideas that will enable the GCO to enhance its products and services.

**Xplora Space Platform**

Through the Xplora Space platform, the Group's employees can see the latest news about new trends in innovation and contribute ideas to challenges launched by the organisation.

In the last year, employees have contributed upwards of 17 ideas to the 2 challenges proposed in the programme. Out of these, 5 ideas have been supported and 1 is in the project phase.

**Training in innovation with Xplora Academy and Xplora Inspira**

Xplora Academy is the Group's training programme in innovation and digital transformation. It holds workshops for employees and provides advanced training in agile and innovation methodologies. Through Xplora Inspira, events are held for employees with the aim of bringing the latest trends in innovation closer in an immersive way, through exclusive talks and experiential workshops. In 2023, 2 events were held, and the topics covered were generative AI and open innovation.

**Xplora Stars for the development of new products**

Xplora Stars was created in 2020 and is designed to develop new products and services in the areas of cyber security, urban mobility and the elderly, counting on the collaboration and ideas of the Group's employees and insurance agents for its development. In 2023, a new on-demand insurance product has been developed.

## Atradius Business Transformation programme

The Atradius Business Transformation programme addresses the challenges of new digital trends (such as big data and blockchain) and offers the employees of the credit insurance business the opportunity to play a role in them through various initiatives.

These include **Shaping Tomorrow Together**, a programme designed to prepare Atradius employees for the new challenges brought about by the adoption of new technologies.

Furthermore, the Atradius Academy learning platform makes online courses available to all Atradius employees and sends out newsletters on digital trends.

## GCO Ventures

GCO Ventures is the Group's new corporate venturing entity created with the aim of identifying, building and launching new businesses aligned with GCO's strategy and priorities, so as to support them and turn them into thriving businesses. By doing so, it seeks to support entrepreneurs by offering them a space where their ideas can materialise and to accompany them at an early stage to help accelerate their growth. Once the initiatives have been identified, they are offered the necessary backing for their development through two channels:

- Venture building: the company works closely with entrepreneurs to help them develop their ideas, validate their business models and make them grow successfully.
- Venture capital: financing to start-ups either directly or through venture capital funds, in order to provide them the opportunity to propel their idea and refine their business model.

The first project in which GCO Ventures is participating in 2023 is the founding and launch of Adecua, a venture whose goal is to adapt the homes of elderly people with varying degrees of mobility and cognitive ability. In doing so, Adecua addresses the need to design and develop solutions that contribute to the well-being of seniors, and thus seeks to respond to the challenge of the ageing population.

# 04.

# Appendix I – Additional information

# European Taxonomy of environmentally sustainable economic activities

The EU Taxonomy Regulation (EU Regulation 2020/852), which entered into force on 12 July 2020, lays down the classification system for environmentally sustainable economic activities.

This Regulation deems an activity to be economically sustainable when it substantially contributes to achieving one or more of the six environmental objectives of Taxonomy: 1) climate change mitigation, 2) climate change adaptation, 3) the sustainable use and protection of water and marine resources; 4) the transition to a circular economy, 5) pollution prevention and control, and 6) the protection and restoration of biodiversity and ecosystems.

Besides making a substantial contribution to at least one of these objectives, it must be proven that the economic activity meets established technical screening criteria, does not cause significant harm (DNSH) to the rest of the objectives and fulfils the minimum social safeguards (MSS).

Article 8 of the Taxonomy Regulation establishes for all companies required to disclose non-financial information (according to Directive 2013/34/EU), the need to include information on how and to what extent the undertaking's activities are associated with economic activities that qualify as environmentally sustainable.

In the 2023 fiscal year, financial undertakings are required to disclose eligibility information concerning Taxonomy Objectives 1 to 6 and alignment information for Taxonomy Objectives 1 and 2.

GCO has conducted an analysis of the Taxonomy requirements regarding its insurance activity, excluding funeral services from scope due to their low significance.

## Asset eligibility and alignment according to the EU Taxonomy

The present procedure is compulsory throughout the Group, and GCO is in charge of reporting the consolidated Group information required by the Taxonomy.

Within the Delegated Regulation (EU) 2021/2178 and its amendments (published in June and November 2023), the indicators to be developed by insurance and reinsurance undertakings to calculate the indicators of their investment activities (assets) are explained.

Based on the type of assets on GCO's balance sheet (according IFRS 9 and IFRS 17), the assets that may affect the denominator and numerator of the key performance indicator have been selected.:

- Denominator: assets considered within the scope of the asset indicator covered by the Taxonomy.
- Numerator: assets considered within the scope of the asset indicator covered by the Taxonomy, that are analysed in order to identify whether or not they are aligned with the Taxonomy.

Pursuant to Article 7 of Delegated Regulation (EU) 2021/2178 the following clarifications are made in relation to the scope of assets to be considered in the key performance indicator:

- Exposures to central governments, central banks and supranational issuers are excluded from the calculation of the numerator and denominator of the key performance indicator for financial undertakings.
- Derivatives are excluded from the numerator of the key performance indicator for financial undertakings.
- Exposures of companies that are not required to publish non-financial information pursuant to Article 19a or 29a of Directive 2013/34/EU (NFRD) will be excluded from the numerator of the key performance indicator for financial undertakings.

In order to obtain the eligibility and alignment percentages (and thus compliance with the DNSH and MSS criteria) of the companies that are part of the Group's asset portfolio, the Clarity tool has been used. The amounts of the aligned investments have been calculated on the basis of the 2022 alignment percentages published by the companies where GCO has a position at the end of 2023.

The results obtained for GCO are as follows (figures in thousands of euros):

| Key Performance Indicator (KPI) | |
|---|---|
| The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with Taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below:<br><br>Turnover-based: 0.011%*<br><br>Capital expenditures-based: 0.013%* | The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with Taxonomy-aligned economic activities, with following weights for investments in undertakings per below:<br><br>Turnover-based: 1,354.0*<br><br>Capital expenditures-based: 1,585.2* |
| The percentage of assets covered by the KPI relative to total investments of insurance or reinsurance undertakings (total AuM). Excluding investments in sovereign entities.<br><br>Coverage ratio: 80% | The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.<br><br>Coverage: 12,674,344.8** |

*The KPIs for the weighted average of aligned investments have been calculated using the alignment percentage of each investment based on its weight within the GCO portfolio.
**The covered assets included assets that cannot be classified into the categories of aligned, eligible non-aligned, and non-eligible due to lack of information. The covered assets that have been able to be classified are included in the following tables.

| Additional, complementary disclosures: breakdown of denominator of the KPI | |
|---|---|
| The percentage of derivatives relative to total assets covered by the KPI.<br><br>0.00% | The value in monetary amounts of derivatives.<br><br>0.0 |
| The proportion of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:<br><br>Non-financial undertakings: 11.00%<br><br>Financial undertakings: 24.25% | Value of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU:<br><br>Non-financial undertakings: 1,393,932.2<br><br>Financial undertakings: 3,098,555.2 |
| The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:<br><br>Non-financial undertakings: 8.56%<br><br>Financial undertakings: 8.60% | Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:<br><br>Non-financial undertakings: 1,084,706.1<br><br>Financial undertakings: 1,090,009.0 |
| The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:<br><br>Non-financial undertakings: 20.49%<br><br>Financial undertakings: 22.12% | Value of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:<br><br>Non-financial undertakings: 2,596,842.1<br><br>Financial undertakings: 2,803,551.0 |
| The proportion of exposures to other counterparties and assets over total assets covered by the KPI:<br><br>22.54% | Value of exposures to other counterparties:<br><br>2,857,058.2 |

| | |
|---|---|
| The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities:<br><br>15.81% | Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities:<br><br>2,003,558.6 |
| The value of all the investments that are funding economic activities that are not Taxonomy-eligible relative to the value of total assets covered by the KPI:<br><br>Turnover-based: 57.33%<br>Capital expenditures-based: 61.77% | Value of all the investments that are funding economic activities that are not Taxonomy-eligible:<br><br>Turnover-based: 7,266,555.9<br>Capital expenditures-based: 7,829,392.2 |
| The value of all the investments that are funding Taxonomy-eligible economic activities, but not Taxonomy-aligned relative to the value of total assets covered by the KPI:<br><br>Turnover-based: 7.98%<br>Capital expenditures-based: 6.87% | Value of all the investments that are funding Taxonomy-eligible economic activities, but not Taxonomy-aligned:<br><br>Turnover-based: 1,011,907.0<br>Capital expenditures-based: 871,233.9 |

| Additional, complementary disclosures: breakdown of numerator of the KPI | |
|---|---|
| The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:<br><br>Non-financial undertakings:<br>Turnover-based: 3.12%<br>Capital expenditures-based: 3.95%<br><br>Financial undertakings:<br>Turnover-based: 0.15%<br>Capital expenditures-based: 0.15% | Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:<br><br>Non-financial undertakings:<br>Turnover-based: 395,491.2<br>Capital expenditures-based: 500,770.0<br><br>Financial undertakings:<br>Turnover-based: 19,228.1<br>Capital expenditures-based: 19,228.1 |
| The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned:<br><br>Turnover-based: 3.08%<br>Capital expenditures-based: 3.21% | Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned:<br><br>Turnover-based: 390,679.6<br>Capital expenditures-based: 407,411.2 |
| The proportion of Taxonomy-aligned exposures to other counterparties in over total assets covered by the KPI:<br><br>Turnover-based: 3.37%<br>Capital expenditures-based: 0.21% | Value of Taxonomy-aligned exposures to other counterparties over total assets covered by the KPI:<br><br>Turnover-based: 15,389.7<br>Capital expenditures-based: 936.2 |

| Breakdown of the numerator of the KPI per environmental objective (Taxonomy-aligned activities) | | |
|---|---|---|
| 1) Climate change mitigation | Turnover: 1.74%<br>CapEx: 4.13% | Transitional activities: A<br>0.04% (turnover)<br>0.10% (CapEx)<br>Enabling activities: B<br>1.15% (turnover)<br>2.40% (CapEx) |
| 2) Climate change adaptation | Turnover: 0.013%<br>CapEx: 0.006% | Enabling activities: B<br>0.013% (turnover)<br>0.0007% (CapEx) |

The following are the templates corresponding to nuclear and fossil energy established in Delegated Regulation (EU) 2022/1214 amending Delegated Regulation (EU) 2021/2178:

Template 1 Nuclear and fossil gas related activities

| Row | Nuclear energy related activities | |
|---|---|---|
| 1 | The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle. | NO |
| 2 | The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies. | NO |
| 3 | The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades. | YES |
| | **Fossil gas related activities** | |
| 4 | The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. | YES |
| 5 | The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. | YES |
| 6 | The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels. | YES |

**Information on Turnover** (figures in thousands of euros)

Template 2 Taxonomy-aligned economic activities (denominator)

| Row | Economic activities | Turnover | | | | | |
|---|---|---|---|---|---|---|---|
| | | CCM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | | Amount | % | Amount | % | Amount | % |
| 1 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 2 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 3 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 2,882.8 | 0.05% | 2,882.8 | 0.05% | 0.0 | 0.00% |
| 4 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 5 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 6 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 7 | **Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI** | 258,280.8 | 4.29% | 217,749.8 | 3.61% | 1,668.4 | 0.03% |
| 8 | **Total applicable KPI** | 261,163.6 | 4.33% | 220,632.6 | 3.66% | 1,668.4 | 0.03% |

Template 3 Taxonomy-aligned economic activities (numerator)

| Row | Economic activities | Turnover | | | | | |
|---|---|---|---|---|---|---|---|
| | | CCM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | | Amount | % | Amount | % | Amount | % |
| 1 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 2 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 3 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 2,882.8 | 1.10% | 2,882.8 | 1.10% | 0.0 | 0.00% |
| 4 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 5 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 6 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 7 | **Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI** | 258,280.8 | 98.9% | 217,749.8 | 83.38% | 1,668.4 | 0.64% |
| 8 | **Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI** | 261,163.6 | 100% | 220,632.6 | 84.48% | 1,668.4 | 0.64% |

Template 4 Taxonomy-eligible but not Taxonomy-aligned economic activities

| Row | Economic activities | Turnover | | | | | |
|---|---|---|---|---|---|---|---|
| | | CCM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | | Amount | % | Amount | % | Amount | % |
| 1 | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 2 | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 3 | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 4 | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 33,021.4 | 0.55% | 33,021.4 | 0.55% | 0.0 | 0.00% |
| 5 | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 2,840.7 | 0.05% | 2,840.7 | 0.05 | 0.0 | 0.00% |
| 6 | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 66.0 | 0.00% | 66.0 | 0.00% | 0.0 | 0.00% |
| 7 | **Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI** | 1,006,584.4 | 16.71% | 782,301.7 | 12.98% | 195,614.8 | 3.25% |
| 8 | **Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI** | 1,042,512.6 | 17.30% | 818,229.8 | 13.58% | 195,614.8 | 3.25% |

Template 5 Taxonomy non-eligible economic activities

| Row | Economic activities | Amount Turnover | Percentage |
|---|---|---|---|
| 1 | Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% |
| 2 | Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% |
| 3 | Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 888,035.3 | 14.74% |

| | | | |
|---|---|---|---|
| 4 | Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 1,282,064.3 | 21.28% |
| 5 | Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 927,211.0 | 15.39% |
| 6 | Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 803,044.4 | 13.33% |
| 7 | **Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI** | 821,072.7 | 13.63% |
| 8 | **Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI** | 4,721,427.7 | 78.36% |

**Information about CapEx** (figures in thousands of euros)

Template 2 Taxonomy-aligned economic activities (denominator)

| Row | Economic activities | CapEx | | | | | |
|---|---|---|---|---|---|---|---|
| | | CCM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | | Amount | % | Amount | % | Amount | % |
| 1 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 2 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 3 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 4,166.4 | 0.06% | 4,166.4 | 0.06% | 0.0 | 0.00% |
| 4 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 31.8 | 0.00% | 31.8 | 0.00% | 0.0 | 0.00% |
| 5 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 56.0 | 0.00% | 56.0 | 0.00% | 0.0 | 0.00% |
| 6 | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| 7 | **Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI** | 544,718.8 | 8.15% | 519,379.0 | 7.77% | 774.1 | 0.01% |
| 8 | **Total applicable KPI** | 548,973.1 | 8.21% | 523,633.3 | 7.83% | 774.1 | 0.01% |

Template 3 Taxonomy-aligned economic activities (numerator)

| Row | Economic activities | CapEx | | | | | |
|---|---|---|---|---|---|---|---|
| | | CCM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | | Amount | % | Amount | % | Amount | % |
| **1** | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| **2** | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0.0 | 0.00% | 0.0 | 0.00% | 0.0 | 0.00% |
| **3** | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 4,166.4 | 0.76% | 4,166.4 | 0.76% | 0.0 | 0.00% |
| **4** | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 31.8 | 0.01% | 31.8 | 0.01% | 0 | 0.00% |
| **5** | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 56.0 | 0.01% | 56.0 | 0.01% | 0 | 0.00% |
| **6** | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| **7** | **Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI** | 544,718.8 | 99.23% | 519,379.0 | 94.61% | 774.1 | 0.14% |
| **8** | **Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI** | 548,973.1 | 100% | 523,633.3 | 95.38% | 774.1 | 0.14% |

Template 4 Taxonomy-eligible but not Taxonomy-aligned economic activities

| Row | Economic activities | CapEx | | | | | |
|---|---|---|---|---|---|---|---|
| | | CCM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | | Amount | % | Amount | % | Amount | % |
| **1** | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| **2** | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| **3** | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **4** | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 9,350.5 | 0.14% | 9,350.5 | 0.14% | 0 | 0.00% |
| **5** | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 419.6 | 0.01% | 419.6 | 0.01% | 0 | 0.00% |
| **6** | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to (EU) Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| **7** | **Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI** | 840,259.5 | 12.57% | 712,135.3 | 10.66% | 25,558.1 | 0.38% |
| **8** | **Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI** | 850,029.6 | 12.72% | 721,905.4 | 10.80% | 25,558.1 | 0.38% |

Template 5 Taxonomy non-eligible economic activities

| Row | Economic activities | CapEx amount | Percentage |
|---|---|---|---|
| **1** | Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0.00% |
| **2** | Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0.00% |
| **3** | Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 590,296.1 | 8.83% |
| **4** | Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 1,226,592.8 | 18.35% |
| **5** | Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 948,006.1 | 14.8% |
| **6** | Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 195,713.7 | 2.93% |
| **7** | **Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI** | 2,323,655.3 | 34.77% |
| **8** | **Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI** | 5,284,264.0 | 79.07% |

The amounts in terms of CapEx and Turnover in the tables "Additional numerator breakdown", "Template 2", "Template 3", "Template 4" and "Template 5", have been calculated using the eligibility and alignment percentages obtained in Clarity with respect to the amount of investment.

As the analysis of the eligibility of Taxonomy objectives 3 to 6 can only be performed through proxies (via NACE), these figures have not been included in the previous mandatory reporting tables.

The result of the eligibility analysis according to objectives 3 to 6, conducted via proxies, is included in the following table:

| Total Eligible Assets with Objectives 3-6 PROXY | Amount (€ thousand) |
|---|---|
| Total Eligible Assets – Objective 3 "Sustainable use and protection of water and marine resources". | 116,199.3 |
| Total Eligible Assets – Objective 4 "Transition to a circular economy". | 222,715.8 |
| Total Eligible Assets – Objective 5 "Pollution prevention and control". | 52,550.6 |
| Total Eligible Assets – Objective 6 "Protection and restoration of biodiversity and ecosystems". | 0 |
| **TOTAL** | **391,465.7** |

**Qualitative information on asset eligibility and alignment indicators following the EU Taxonomy.**
The denominator has considered the covered assets, which are: Goodwill, Intangible Assets, Real Estate, Land and Equipment for own use, Investments in real estate (other than for own use), Investments (other than Index Linked and Unit Linked assets), Participations, Variable Income, Private Fixed Income, Structured Notes, Collateralised Securities, Investment Funds, Derivatives, Deposits (other than cash equivalents), Other Investments, Assets held for unit-linked contracts, Loans and Mortgages, Loans and Mortgages to individuals, Other Loans and Mortgages, Loans and policies, Deposits to Assignors, Treasury shares, Cash and cash equivalents.

In the numerator, the following have been treated as potentially eligible assets: Investments (other than Index Linked and Unit Linked assets), Investments in Real Estate (other than for own use), Participations, Variable Income, Private Fixed Income, Structured Notes, Collateralised Securities, Investment Funds, Deposits (other than cash equivalents), Assets held for unit-linked contracts, Loans and Mortgages, Loans and Mortgages to individuals, Other Loans and Mortgages, Loans and policies.

Eligibility and alignment information for the above assets is obtained through the Clarity tool. Assets that have an identifying code that Clarity does not recognize, that is, they do not have an ISIN, have been analysed separately. The issuer data has been obtained manually through their reports or from other investments of the same issuer that have been loaded into Clarity.

For **investment funds** for which information is available, a look-through of the fund has been conducted and its eligibility and alignment has been analysed. Funds for which there is no information available, have been included as non-eligible. Furthermore, intra-Group investments have been deemed covered and non-eligible since they are investments defined by regulation, but for which it is not possible to assess their eligibility and alignment.

In the case of **environmentally sustainable bonds (green bonds)** issued by a company, the Taxonomy allows to include specific information regarding the eligibility and alignment within the calculation of the KPIs on such financing. Therefore, in the calculation process, GCO did not use information on the eligibility and alignment of the company issuing the environmentally sustainable bond, but rather the specific information of the bond, using the Clarity tool. Additionally, the Taxonomy Regulation establishes that environmentally sustainable bonds that are supranational, issued by governments or central banks, should be included if information reported by the issuer is available.

In case the issuer has not specifically published information regarding the environmentally sustainable bond, the issuer's data is used as for the rest of the assets.

Regarding **real estate assets**, only those intended for third-party use have been considered eligible. In order to define their alignment, analysis has been conducted on the 37 main properties of the Group that generate turnover (lease payments) during the year, and it was identified whether they have CapEx from renovations to improve environmental efficiency. The rest of the real estate assets have been deemed as non-aligned due to their low materiality regarding the total portfolio. The turnover and CapEx of the real estate assets in the fiscal year have been taken into account for the calculation of eligibility and alignment.

Once these criteria were verified, the 37 real estate assets have been checked for compliance with the regulatory requirements of activity 7.7 Acquisition and ownership of buildings for climate change mitigation and adaptation objectives.

To determine if the real estate assets that meet the above criteria are finally aligned, it has been evaluated whether they comply with the DNSH. To this end, it has been analysed whether these real estate assets could be materially exposed to physical climate risks. When it has been determined that the climate risk is material, it has been analysed whether adaptation solutions are available through a climate risk adaptation plan.

With regard to **real estate investment funds**, an analysis has been conducted to verify the availability of Taxonomy information in accordance with Articles 8 or 9 of the SFDR Regulation. Based on this analysis, each real estate investment fund has been requested to provide its alignment data. For those funds that had such data, it has been taken as a reference for calculating the corresponding KPIs included in the tables reported above. However, for those funds that do not have this information, their underlying assets (real estate assets and infrastructure) have been analysed whenever possible.

The Taxonomy information of GCO's real estate assets and real estate investment funds has been collected by completing questionnaires defined for this purpose.

## Underwriting eligibility and alignment according to EU Taxonomy

Within the Delegated Regulation (EU) 2021/2178 and amendments thereto (published in June and November 2023), the indicators to be developed by insurance and reinsurance undertakings relating to their activity are explained. In order to calculate these indicators, the information has been extracted from the non-life insurance activity and from the reinsurance activity.

| | | | | Do No Significant Harm (DNSH) | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Economic activities** | **Absolute premiums, year t** | **Proportion of premiums, year t** | **Proportion of premiums, year t-1** | **Climate change mitigation** | **Water and marine resources** | **Circular economy** | **Pollution** | **Biodiversity and ecosystems** | **Minimum safeguards** |
| | Thousand € | % | % | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N |
| A.1. Non-life insurance and reinsurance underwriting Taxonomy-aligned activities (environmentally sustainable) | 142,644.5 | 3.23% | *N/A* | Y | Y | Y | Y | Y | Y |
| A.1.1 Of which reinsured | *N/A* | *N/A* | *N/A* | - | - | - | - | - | - |
| A.1.2 Of which stemming from reinsurance activity | *N/A* | *N/A* | *N/A* | - | - | - | - | - | - |
| A1.2.1 Of which reinsured (retrocession) | *N/A* | *N/A* | *N/A* | - | - | - | - | - | - |
| A.2. Non-life insurance and reinsurance underwriting Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) | 9,950.9 | 0.23% | *N/A* | | | | | | |
| B. Non-life insurance and reinsurance underwriting Taxonomy-non-eligible activities | 4,264,354.3 | 96.55% | *N/A* | | | | | | |
| **Total (A.1 + A.2 + B)** | 4,416,949.7 | 100% | *N/A* | | | | | | |

**Qualitative information on eligibility and underwriting alignment indicators following the EU Taxonomy.**
For the eligibility analysis, all non-life lines of business in the scope of GCO was thoroughly analysed. The analysis identified the lines of business that directly provide cover for at least one climate risk based on the table in Appendix A to Delegated Regulation (EU) 2021/2139. The premiums exclusively related to climate risk have been considered as eligible premiums.

The information reported has been calculated using data obtained from information management systems of the Group. The information found in each of these systems is at a different level of granularity and sometimes it has not been possible to identify premiums linked to climate risks. Due to this, there are two different situations depending on the information available:

- Breakdown of the premium at a coverage level: in these cases, the eligible premium has been obtained by applying the percentage of climate coverage to the total premium of the policy. To this end, only coverage related to atmospheric phenomena have been selected.
- Historical series of claims: in cases in which it has not been possible to break down the premium by coverages, but it has been possible to identify the presence of climate coverage, an approximation has been made based on claims data.

The calculation of the alignment according to Taxonomy Regulation involves analysing three requirements:

1. **Technical selection criteria (TSC)**: the compliance with TSC has been analysed in detail for each of the eligible lines of business obtained above. The gathering of GCO Taxonomy information for the analysis of the TSC has been conducted by filling out questionnaires based on solid evidence. Below, it is described how the company complies with each TSC:
   - TSC 1.1: the insurance activity uses advanced modelling techniques through prospective climate scenario analyses conducted by the Risk Area.
   - TSC 1.2: GCO discloses how it considers climate change risks in the Sustainability Report.
   - TSC 1.3: the procurement of climate coverages is established by default regardless of the insurance modality, which provides an incentive for their acquisition and ensures risk reduction.
   - TSC 1.4: following a climate risk event, there is a company procedure in place to evaluate and contact the customer according to its claims ratio to establish the renewal conditions.
   - TSC 2.1: product pricing establishes lower premiums based on the preventive measures available (for example, if a home insurance policy covers a house constructed with heat and fire-resistant materials, the risk exposure is lower, therefore resulting in lower premiums).
   - TSC 2.2: the company provides articles, commercial notes or informative materials available on its website detailing preventive measures that can be adopted to mitigate risk.
   - TSC 3.1: the products of the lines of business considered in the KPI’s of eligibility and alignment have coverage against climate events (rain, wind, hail, etc.).
   - TSC 3.2: product conditionalities include coverages related to secondary effects derived from natural risks (for example, secondary effects of fires resulting in smoke, vapours, dust, etc.).
   - TSC 4.1 and 4.2: GCO shares information with the Insurance Compensation Consortium free of charge.
   - TSC 5: GCO has internal action procedures enabling a high level of service in the event of large-scale climate claims and informs intermediaries and customers about the existing channels for declaring the claim.

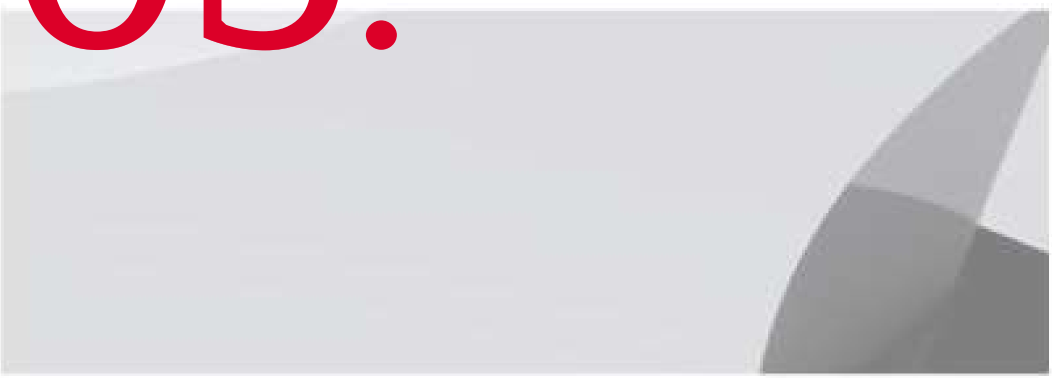
2. **DNSH criterion**: in order to fulfil this criterion, the volume of eligible premiums obtained from customers with fossil fuel-related NACE codes has been extracted from the volume of eligible premiums.

3. **MSS criterion**: GCO fulfils the Minimum Social Safeguards as set out in the due diligence procedures and policies, including those required by the Taxonomy regarding respect for and compliance with the following principles and statements:
   - OECD Guidelines for Multinational Enterprises.
   - ILO Declaration on Fundamental Principles and Rights at Work
   - UN Guiding Principles on Business and Human Rights
   - International Bill of Human Rights

On the basis of the information obtained from the above analysis, the percentage of alignment of eligible premiums has been calculated.

The data used to calculate the KPIs of Taxonomy correspond to the figures included in GCO's Consolidated Management Report (based on IFRS 4). GCO's Consolidated Annual Accounts 2023 (note *2.e Comparison of information*) includes the reconciliation between the financial statements (based on IFRS 17) and the Consolidated Management Report (based on IFRS 4).

# 05.



# Appendix II – GRI content index

# GRI content index

| GRI Standard | Contents | Page or direct response | Omission |
|---|---|---|---|
| **Foundation (2021)** | | | |
| **GRI 1: Foundation** | Claims of reporting in accordance with the GRI Standards<br>GRI content index | Page 5 and 79 | |
| **General Disclosures (2021)** | | | |
| **GRI 2: General Disclosures** | **THE ORGANISATION AND ITS REPORTING PRACTICES** | | |
| | 2-1 Organizational details | Grupo Catalana Occidente, S.A.<br>Paseo de la Castellana nº4, 28046 (Madrid)<br>Pages 7 and 10 | |
| | 2-2 Entities included in the organisation's sustainability reporting | Page 5<br>See also Appendix I and Appendix II of GCO's Annual Report 2023 (Consolidated Annual Accounts section) and note "2.f) Basis of consolidation" (Notes to the Consolidated Annual Accounts section). | |
| | 2-3 Reporting period, frequency and contact point | Report period: Financial year 2023<br>Frequency: Yearly<br>Date of issue: 29 February 2024<br>Contact point: **investor@gco.com** | |
| | 2-4 Restatements of information | No material restatements in the period. Indicated on the document in the event of restatements of information. | |
| | 2-5 External assurance | Page 92 | |
| | **ACTIVITIES AND WORKERS** | | |
| | 2-6 Activities, value chain and other business relationships | Pages 7-10 and 40 | |
| | 2-7 Employees | Pages 31-40<br>The Group does not have employees with non-guaranteed hours | |
| | 2-8 Workers who are not employees | Page 44 | |
| | **GOVERNANCE** | | |
| | 2-9 Governance structure and composition | Pages 11, 12, 18, 19 and 48 | |
| | 2-10 Nomination and selection of the highest governance body | Page 13 | |
| | 2-11 Chair of the highest governing body | José María Serra Farré.<br>The Chairman of the Board of Directors does not have any senior management functions in the organisation | |
| | 2-12 Role of the highest governance body in overseeing the management of impacts. | Pages 14, 15, 18, 19 and 48 | |
| | 2-13 Delegation of responsibility for managing impacts | Pages 18, 19 and 48 | |
| | 2-14 Role of the highest governance body in sustainability reporting | Pages 18 y 19 | |
| | 2-15 Conflicts of interest | 2023 Annual Corporate Governance Report (Section D.6) | |
| | 2-16 Communication of critical concerns | Pages 15 and 57 | |
| | 2-17 Collective knowledge of the highest governance body | Pages 18, 37 and 38 | |
| | 2-18 Evaluation of the performance of the highest governance body | Page 13<br>2023 Annual Corporate Governance Report (Section C1.17) | |
| | 2-19 Remuneration policy | Pages 13 and 14<br>Annual Remuneration Report 2023 (Section A) | |
| | 2-20 Process for determining remuneration | Pages 13 and 14 | |

| | | | |
|---|---|---|---|
| | | Annual Remuneration Report 2023 (Section A) | |
| | 2-21 Annual total compensation ratio | | The information relating to this indicator is not published for confidentiality reasons. |
| | **STRATEGY, POLICIES AND PRACTICES** | | |
| | 2-22 Statement on sustainable development strategy | Pages 3 and 4 | |
| | 2-23 Policy commitments | Pages 14, 15, 43 and 55-59 | |
| | 2-24 Embedding policy commitments | Pages 22 and 23 | |
| | 2-25 Processes to remediate negative impacts | Pages 55-59 | |
| | 2-26 Mechanisms for seeking advice and raising concerns about ethics | Pages 55-59 | |
| | 2-27 Compliance with laws and regulations | In 2023, 1 penalty amounting to €278,000 has been received (3 penalties amounting to €158,000 in 2022). Accounting provisions for claims of any nature and above a threshold of 30,000 euros are reported.<br>No fines or penalties have been received for breaches of environmental laws or regulations in 2022 and 2023. | |
| | 2-28 Membership of associations | Pages 29, 63 and 64 | |
| | 2-29 Approach to stakeholder engagement | Pages 20 and 21 | |
| | 2-30 Collective bargaining agreements | Page 36 | |
| **Material topics (2021)** | | | |
| **GRI 3: Material topics** | 3-1 Process to determine material topics | Page 20 | |
| | 3-2 List of material topics | Pages 20 and 21 | |
| **RESPONSIBLE INVESTMENT** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Responsible investment management approach | Pages 24 and 25 | |
| **GRI 203 (2016): Indirect economic impacts** | 203-2 Significant indirect economic impacts | Pages 24 and 25 | |
| **RESPONSIBLE PRODUCTS** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Responsible product management approach | Pages 26-28 | |
| **GRI 417 (2016): Marketing and labelling** | 417-2 Cases and non-compliances related to information and labelling of products and services | No cases of breaches of regulations or voluntary codes relating to product and service information and labelling have been recorded in 2022 or 2023. | |
| **ESG RISK MANAGEMENT** | | | |
| **GRI 3 (2021): Material topics** | 3-3 ASG risk management approach | Pages 14-16 | |
| **GRI 201 (2016): Economic performance** | 201-2 Financial implications and other risks and opportunities due to climate change | Pages 15, 16, 49 and 50 | |
| **CORPORATE GOVERNANCE** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Corporate governance management approach | Pages 11-14 | |
| **GRI 405 (2016): Diversity and equal opportunities** | 405-1 Diversity of governance bodies and employees | Pages 11-13, 33 and 34 | The percentage of employees broken down by professional category and age group is not reported (only absolute figures are reported). |

| | | | |
|---|---|---|---|
| **ETHICS, INTEGRITY AND TRANSPARENCY** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Ethics, integrity and transparency management approach | Pages 55-59 | |
| **GRI 201 (2016): Economic performance** | 201-4 Financial assistance received from the government | In 2023, Grupo Catalana Occidente S.A. did not receive any public subsidies (in 2022 it received 200 thousand euros that went to the Catalana Occidente Actuarial Tool project). | |
| **GRI 205 (2016): Anti-corruption** | 205-2 Communication and training about anti-corruption policies and procedures | Pages 58 and 59 | |
| | 205-3 Number of cases involving corruption and bribery | Pages 56, 58 and 59 | |
| **GRI 206 (2016): Unfair competition** | 206-1 Legal actions for anti-competitive behaviour, anti-trust and monopoly practices | In 2023, there have been 2 incidents of anti-competitive behaviour in the funeral business, one with a favourable judgement for GCO and another in process. (0 records in 2022). | |
| **GRI 415 (2016): Public policy** | 415-1 Contributions to political parties and/or representatives | As in 2022, no contributions have been made to political parties in 2023. | |
| **CUSTOMER EXPERIENCE** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Customer experience management approach | Pages 40-43 | |
| **DATA PROTECTION AND CYBERSECURITY** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Data protection and cybersecurity management approach | Pages 57 and 58 | |
| **GRI 418 (2016): Customer privacy** | 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data | Pages 57 and 58 | |
| **INNOVATION** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Innovation management approach | Page 66 | |
| **MANAGEMENT OF SERVICE PROVIDERS** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Management of service providers management approach | Pages 45-47 | |
| **GRI 204 (2016): Acquisition practices** | 204-1 Proportion of spending on local suppliers | Page 47 | |
| **GRI 308 (2016): Environmental evaluation of suppliers** | 308-1 New suppliers that were screened using environmental criteria | Pages 46 and 47 | |
| **GRI 414 (2016): Supplier social assessment** | 414-1 New suppliers that were screened using social criteria | Pages 46 and 47 | |
| **CLIMATE CHANGE AND ENVIRONMENTAL MANAGEMENT** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Management approach to climate change and environmental management | Pages 48-55 | |
| **GRI 301 (2016): Materials** | 301-1 Materials used by weight or volume | Page 53 | |
| | 301-2 Consumables recycled | Page 53 | |
| **GRI 302 (2016): Energy** | 302-1 Energy consumption within the organisation | Pages 52 and 53 | |
| **GRI 305 (2016): Emissions** | 305-1 Direct (Scope 1) GHG emissions | Pages 50 and 51 | |
| | 305-2 Indirect GHG emissions when generating energy (scope 2) | Pages 50 and 51 | |
| | 305-3 Other indirect (Scope 3) GHG emissions | Pages 50 and 51 | |
| **QUALITY EMPLOYMENT** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Quality management approach | Pages 31-40 | |
| **GRI 401 (2016): Employment** | 401-1 New employee hires and employee turnover | Page 33 | No figures are reported in relation to the total number of new employee hires broken down by region, nor new recruitment by age range, gender and region. The total number of departures and the |

| | | | |
|---|---|---|---|
| | | | turnover rate per region are not reported. |
| **GRI 402 (2016): Employee-company relations** | 402-1 Minimum notice periods regarding operational changes | The minimum notice periods are established in the different collective agreements of the organisation's employees. In countries that do not have a collective bargaining agreement, the applicable local laws are applied. | |
| **GRI 405 (2016): Diversity and equal opportunities** | 405-1 Diversity of governance bodies and employees | Pages 33 and 34 | The percentage of employees broken down by professional category and age group is not reported. |
| | 405-2 Ratio of basic salary and remuneration of women to men | Pages 13, 14 and 39 | |
| **GRI 406 (2016): Non-discrimination** | 406-1 Incidents of discrimination and corrective actions taken | Pages 33, 34 and 56 | |
| **GRI 407 (2016): Freedom of association and collective bargaining** | 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk | Pages 36, 46 and 47<br>No operations or suppliers with significant risk of being involved in freedom of association and collective bargaining cases have been identified. | |
| **RECRUITMENT, DEVELOPMENT AND RETENTION OF TALENT** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Management approach to talent attraction, development and retention management | Pages 32 and 33 | |
| **GRI 404 (2016): Training and education** | 404-1 Average hours of training per year per employee | Pages 37 and 38 | |
| | 404-3 Percentage of employees receiving regular performance and career development reviews | Page 38 | |
| **HEALTH AND SAFETY** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Health and safety management approach | Page 35 | |
| **GRI 403 (2016): Occupational health and safety** | 403-1 Occupational health and safety management system | Page 35 | |
| | 403-2 Hazard identification, risk assessment, and incident investigation | Page 35 | |
| | 403-3 Occupational health services | Page 35 | |
| | 403-4 Worker participation, consultation, and communication on occupational health and safety | Page 35 | |
| | 403-5 Educating employees on occupational health and safety | Page 35 | |
| | 403-6 Encouraging health among employees | Page 35 | |
| | 403-9 Work-related injuries | Page 36 | There is no information available on the number of occupational injuries with major consequences (excluding fatalities), the rate of occupational injuries with major consequences (excluding fatalities), or the rate of recordable occupational injuries.<br>No information is available regarding workers who are not employees, but whose jobs or workplaces are controlled by the organisation (intermediaries, associates, etc.) |

| | | | |
|---|---|---|---|
| | 403-10 Work-related ill health | Page 36 | No information is available regarding the main types of occupational ailments and illnesses. There is no information available on the number of deaths resulting from an occupational disease or illness. No information is available regarding workers who are not employees, but whose jobs or workplaces are controlled by the organisation (intermediaries, associates, etc.) |
| **COMMITMENT TO SOCIETY** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Commitment to society management approach | Pages 61-65 | |
| **GRI 201 (2016): Economic performance** | 201-1 Direct economic value generated and distributed, in particular relating to the creation of economic value. | Pages 60 and 61 | |
| **GRI 203 (2016): Indirect economic impacts** | 203-2: Significant indirect economic impacts | Pages 47, 61-65 | |
| **DEVELOPMENT OF LOCAL COMMUNITIES** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Management approach to local community development | Pages 61-65 | |
| **GRI 413 (2016): Local communities** | 413-1 Operations with local community engagement, impact assessments, and development programmes | Pages 61-65 | |
| **HUMAN RIGHTS** | | | |
| **GRI 3 (2021): Material topics** | 3-3 Human rights management approach | Page 56 | |
| **GRI 408 (2016): Child labour** | 408-1 Operations and suppliers at significant risk for incidents of child labor | Page 56<br>No operations or suppliers with significant risk of being involved in child labour have been identified. | |
| **GRI 409 (2016): Forced or compulsory labour** | 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour | Page 56<br>No operations or suppliers with significant risk of being involved in forced or compulsory labour have been identified. | |
| **GRI 412 (2016): Human rights evaluation** | 412-1 Operations that have been subject to human rights reviews or impact assessments | No operations have been identified that should be subject to review or evaluation regarding impact on human rights. | |
| | 412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening | There are no significant investment agreements, defined as investment management mandates, given that GCO directly manages almost all investments. | |

# 06.

## Appendix III – NFIS content index

# Non-Financial Information Statement (NFIS) content index

The following table contains the pages of this Report in which the information required by Spanish Law 11/2018, of 28 December, on non-financial information and diversity, can be found.

| Information requested by Law 11/2018 | | Related GRI standards* | Page or direct response |
|---|---|---|---|
| | **General information** | | |
| **Business model** | Brief description of the group's business model (business environment and organisation) | 2-6 Activities, value chain and other business relationships | Pages 7-10, 40, 49 and 50 |
| | Geographical presence | 2-1 Organizational details | Grupo Catalana Occidente, S.A. Paseo de la Castellana nº4, 28046 (Madrid)<br>Page 7 and 10 |
| | | 2-6 Activities, value chain and other business relationships | Page 7 |
| | Objectives and strategies of the organisation | 2-22 Statement on sustainable development strategy | Pages 3 and 4 |
| | Main factors and trends that could affect its future performance | 2-6 Activities, value chain and other business relationships | Pages 9, 14-16, 49 and 50 |
| **Policies** | Description of the policies applied by the Group regarding these issues, including due diligence procedures applied for identifying, assessing, preventing and mitigating significant risks and impacts, and verification and control procedures, including what measures have been adopted. | 3-3 Management of material topics | Pages 11-16, 24-28, 31-43, 45-59 and 61-66 |
| **Results of the policies** | The results of those policies, including relevant non-financial KPIs to enable monitoring and assessment of progress and to support comparability across companies and sectors, in line with the national, European or international frameworks used. | 3-3 Management of material topics | Pages 11-16, 24-28, 31-43, 45-59 and 61-66 |
| **Risks** | The main risks related to those issues linked to the group's activities, including, where relevant and proportionate, its business relationships, products or services that may have negative effects in these fields and how the group manages these risks, explaining the procedures used to detect and evaluate them in accordance with the national, European or international reference frameworks for each area. Information must be included on any impacts detected, with a breakdown of the impacts, in particular the main short-, medium- and long-term risks. | 2-12 Role of the highest governance body in overseeing the management of impacts. | Pages 14-16, 18, 19, 49 and 50 |
| **Reporting framework** | Mention in the report of the national, European or international reporting framework used for the selection of key indicators of non-financial results included in each section | 1 Foundation | Pages 5 and 79 |
| | **Information about environmental matters** | | |
| **Environmental management** | Current and forecast effects of the company's activities on the environment and, where appropriate, health and safety | 3-3 Management of material topics | Pages 15, 16, 49 and 50 |
| | | 2-27 Compliance with laws and regulations | No penalties have been received by GCO for breaches of environmental laws or regulations in 2022 and 2023. |
| | Environmental assessment or certification procedures. | 3-3 Management of material topics | Pages 52 and 53 |
| | Resources assigned to the prevention of environmental risks | 3-3 Management of material topics | Pages 52 and 53 |
| | Application of the principle of precaution. | 2-23 Policy commitments | Pages 50 and 51 |
| | Amount of provisions and guarantees for environmental risks | 3-3 Management of material topics | Pages 15.16, 49 and 50 |
| **Pollution** | Measures to prevent, reduce or repair emissions that seriously affect the environment; taking into account any form of activity-specific air pollution, including noise and light pollution | 3-3 Management of material topics | Pages 53 and 54 |
| **Circular economy and prevention and management of waste** | Circular Economy and actions on prevention, recycling, reuse, other forms of recovery and disposal of waste | Not material | |
| | Actions to combat food waste | Not material | |
| | Consumption and supply of water according to local restrictions | Not material | |

*2021 unless indicated otherwise

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| **Sustainable utilization of resources** | Consumption of raw materials and measures taken to improve the efficiency of their use | 301-1 (2016) Materials used by weight or volume | Page 53 |
| | | 301-2 (2016) Consumables recycled | Page 53 |
| | Direct and indirect energy consumption | 302-1 (2016) Energy consumption within the organisation | Pages 52 and 53 |
| | Measures taken to improve energy efficiency | 3-3 Management of material topics | Pages 52-54 |
| | Use of renewable energies | 302-1 (2016) Energy consumption within the organisation | Pages 52-54 |
| **Climate Change** | Significant elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces | 305-1 (2016) Direct (Scope 1) GHG emissions | Pages 50 and 51 |
| | | 305-2 (2016) Indirect (Scope 2) GHG emissions | Pages 50 and 51 |
| | | 305-3 (2016) Other indirect (Scope 3) GHG emissions | Pages 50 and 51 |
| | Measures adopted to adapt to the consequences of climate change | 3-3 Management of material topics | Pages 15, 16, 49 and 50 |
| | | 201-2 (2016) Financial implications and other risks and opportunities due to climate change | Pages 49 and 50 |
| | Reduction targets voluntarily established in the medium and long-term to reduce greenhouse gas emissions and the measures implemented for this purpose | 3-3 Management of material topics | Pages 51 and 52 |
| **Protection of Biodiversity** | Measures taken to preserve or restore biodiversity | Not material | |
| | Impacts caused by activities or operations in protected areas. | Not material | |
| | **Information on social and staff-related matters** | | |
| **Employment** | Total number and distribution of employees by gender, age, country and professional classification | 2-7 Employees | Pages 31-33 |
| | | 405-1 (2016) Diversity of governance bodies and employees | Pages 33 and 34 |
| | Total number and distribution of employment contract types, annual average of permanent contracts, temporary contracts and part-time contracts by gender, age and professional classification | 2-7 Employees | Pages 31-33 |
| | Number of dismissals by gender, age and professional category. | 401-1 (2016) New employee hires and employee turnover | Page 33 |
| | Average remuneration and its evolution disaggregated by gender, age and occupational classification or equal value. | 405-2 (2016) Ratio of basic salary and remuneration of women compared to men | Pages 38 and 39 |
| | Pay gap, the remuneration of equal or average jobs in the company. | | |
| | Average remuneration of directors and executives, including variable remuneration, allowances, compensation and payment into long-term savings benefit systems and any other payment broken down by gender | | |
| | Implementation of policies on the right to disconnect | 3-3 Management of material topics | Pages 34 and 35 |
| | Employees with a disability | 405-1 (2016) Diversity of governance bodies and employees | Page 34 |
| **Work organization** | Organisation of the working time | 3-3 Management of material topics | Pages 34 and 35 |
| | Number of hours of absenteeism | 3-3 Management of material topics | Page 35 |
| | Measures to facilitate work and private life balance and to encourage shared responsibility by both parents. | 3-3 Management of material topics | Pages 34 and 35 |
| **Health and safety** | Health and safety at work conditions | 3-3 Management of material topics | Pages 35 and 36 |
| | | 403-1 (2016) Occupational health and safety management system | Page 35 |
| | | 403-2 (2016) Identification of hazards, risk assessment and investigation of incidents | Page 35 |
| | | 403-3 (2016) Occupational health services | Page 35 |
| | | 403-4 (2016) Worker participation, consultation, and communication on occupational health and safety | Page 35 |
| | | 403-5 (2016) Worker training on occupational health and safety | Page 35 |
| | | 403-6 (2016) Promotion of worker health | Page 35 |

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| | Work-related accidents, in particular their frequency and severity, as well as occupational diseases; disaggregated by gender. | 403-9 (2016) Work-related injuries | Page 36 |
| | | 403-10 (2016) Work-related ill health | Page 36 |
| **Social relations.** | Organising social dialogue, including procedures for informing, consulting and negotiating with staff; | 3-3 Management of material topics | Page 21 |
| | Percentage of employees covered by collective workers agreements by country. | 2-30 Collective bargaining agreements | Page 36 |
| | Balance of collective bargaining agreements, especially in the field of occupational health and safety. | 3-3 Management of material topics | Page 36 |
| | Mechanisms and procedures that the company has in place to encourage worker involvement in managing the company, in terms of information, consultation and participation. | 3-3 Management of material topics | Pages 20, 39 and 40 |
| **Training** | Policies implemented in the field of training | 3-3 Management of material topics | Pages 37 and 38 |
| | Total number of training hours by professional classification | 404-1 (2016) Average hours of training per year per employee | Page 38 |
| **Universal access for disabled people** | Universal access for disabled people | 3-3 Management of material topics | Page 34 |
| **Equality** | Measures adopted to promote equal treatment and opportunities for men and women | 3-3 Management of material topics | Page 33 and 34 |
| | Equality plans (Chapter III of Organic Law 3/2007, of 22 March, for effective gender equality), measures taken to promote employment, protocols against sexual and gender-based harassment, integration and universal accessibility for people with disabilities | | |
| | Policy against any type of discrimination and, where necessary, management of diversity | | |
| | **Information on respecting human rights** | | |
| **Application of due diligence procedures** | Application of due diligence procedures regarding human rights; prevention of risks of human rights violations and, where applicable, measures to mitigate, manage and redress possible abuses committed | 2-23 Policy commitments | Pages 55 and 56 |
| | | 2-26 Mechanisms for seeking advice and raising concerns about ethics | Pages 55 and 56 |
| | | 407-1 (2016) Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk | Pages 36, 46 and 47<br>No operations or suppliers with significant risk of being involved in freedom of association and collective bargaining cases have been identified. |
| | | 408-1 (2016) Operations and suppliers at significant risk for incidents of child labor | Page 56<br>No operations or suppliers with significant risk of being involved in child labour have been identified. |
| | | 409-1 (2016) Operations and suppliers with significant risk of being involved in forced or compulsory labour | Page 56<br>No operations or suppliers with significant risk of being involved in forced or compulsory labour have been identified. |
| | | 412-1 (2016) Operations that have been subject to human rights reviews or impact assessments | No operations have been identified that should be subject to review or evaluation regarding impact on human rights. |
| | | 412-3 (2016) Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening | There are no significant investment agreements, defined as investment management mandates, given that GCO directly manages almost all investments. |
| | Complaints relating to cases of human rights violations | 406-1 (2016) Incidents of discrimination and corrective actions taken | Pages 33, 34 and 56 |
| | | 2-27 (2016) Non-compliance with social and economic laws and regulations | In 2023, 1 sanction amounting to €278,000 has been received (during 2022, 3 sanctions amounting to €158,000 were received). Accounting provisions for penalties above a threshold of 30,000 euros are reported. |
| | | 3-3 Management of material topics | Page 56 |

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| | Promoting and complying with the provisions of the core conventions of the International Labour Organisation related to respect for freedom of association and the right to collective bargaining; Eliminating discrimination in employment and occupation; The elimination of forced or compulsory labour; The effective abolition of child labour. | 406-1 (2016) Incidents of discrimination and corrective actions taken | Pages 34 and 56 |
| | | 407-1 (2016) Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk | Pages 36, 46 and 47<br>No operations or suppliers with significant risk of being involved in freedom of association and collective bargaining cases have been identified. |
| | | 408-1 (2016) Operations and suppliers at significant risk for incidents of child labor | Page 56<br>No operations or suppliers with significant risk of being involved in child labour have been identified. |
| | | 409-1 (2016) Operations and suppliers with significant risk of being involved in forced or compulsory labour | Page 56<br>No operations or suppliers with significant risk of being involved in forced or compulsory labour have been identified. |
| | **Information on the fight against corruption and bribery** | | |
| **Information on the fight against corruption and bribery** | Measures implemented to prevent corruption and bribery. | 3-3 Management of material topics | Pages 58 and 59 |
| | | 2-23 Policy commitments | Pages 58 and 59 |
| | | 2-26 Mechanisms for seeking advice and raising concerns about ethics | Pages 58 and 59 |
| | | 205-3 (2016) Number of case involving corruption and bribery | Page 59 |
| | Measures to combat money laundering. | 3-3 Management of material topics | Page 57 |
| | | 2-23 Policy commitments | Page 57 |
| | | 2-26 Mechanisms for seeking advice and raising concerns about ethics | Page 57 |
| | | 205-2 (2016) Communication and training about anti-corruption policies and procedures | Pages 57-59 |
| | Contributions made to foundations and non-profit organisations | 201-1 (2016) Direct economic value generated and distributed | Page 61 |
| | | 413-1 (2016) Operations with local community engagement, impact assessments, and development programmes | Pages 61- 64 |
| | **Company information** | | |
| **Commitment by the company to sustainable development** | The impact of the company's activity on local employment and development | 3-3 Management of material topics | Pages 22, 23, 45-47, 61-65 |
| | | 203-2 (2016) Significant indirect economic impacts | Pages 47, 61-65 |
| | | 204-1 (2016) Proportion of spending on local suppliers | Page 47 |
| | The impact of the company's activity on local populations and the region. | 3-3 Management of material topics | Pages 61-65 |
| | | 413-1 (2016) Operations with local community engagement, impact assessments, and development programmes | Pages 61-65 |
| | Relationships with members of the local communities and the types of dialogue with them | 2-29 Approach to stakeholder engagement | Pages 20 and 21 |
| | | 2-28 Membership of associations | Pages 29, 63 and 64 |
| **Subcontracting and suppliers** | Inclusion of social, gender equality and environmental matters in procurement policies | 3-3 Management of material topics | Pages 45-47 |
| | Consideration of their social and environmental responsibility in relationships with suppliers and subcontractors | 3-3 Management of material topics | Pages 45-47 |
| | | 2-6 Activities, value chain and other business relationships | Pages 45-47 |
| | | 308-1 (2016) New suppliers that were screened using environmental criteria | Pages 46 and 47 |
| | | 414-1 (2016) New suppliers that were screened using social criteria | Pages 46 and 47 |
| | Supervision and audit systems, and their results | 3-3 Management of material topics | Pages 46 and 47 |

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| | | 2-6 Activities, value chain and other business relationships | Pages 46-47 |
| **Consumers** | Measures for the health and safety of consumers | 3-3 Management of material topics | Pages 40-43, 57 y 58 |
| | | 418-1 (2016) Substantiated complaints concerning breaches of customer privacy and losses of customer data | Pages 57 and 58 |
| **Tax information** | Profits obtained country by country<br>Tax paid on profits. | 3-3 Management of material topics | Page 60 |
| | Information on public subsidies received | 201-4 (2016) Financial assistance received from the government | In 2023, Grupo Catalana Occidente S.A. did not receive any public subsidies (in 2022 it received 200 thousand euros that went to the Catalana Occidente Actuarial Tool project). |
| | **Other material information** | | |
| **Other information about the Company's profile** | | 2-1 Organizational details | Grupo Catalana Occidente, S.A.<br>Paseo de la Castellana nº4, 28046 (Madrid)<br>Pages 7 and 10 |
| | | 2-6 Activities, value chain and other business relationships | Pages 7-10, 40-45 |
| **Information on Corporate Governance** | | 2-9 Governance structure and composition | Pages 11, 12, 18, 19 and 48 |
| | | 2-13 Delegation of responsibility for managing impacts | Pages 18, 19 and 48 |
| **Information on the involvement of stakeholders** | | 2-29 Approach to stakeholder engagement | Pages 20 and 21 |
| **Other useful information** | | 2-2 Entities included in the organisation's sustainability reporting | Page 5<br>See also Appendix I and Appendix II of GCO's Annual Report 2023 (Consolidated Annual Accounts section) and note "2.f) Basis of consolidation" (Notes to the Consolidated Annual Accounts section). |
| | | 3-1 Process to determine material topics | Pages 20 and 21 |
| | | 3-2 List of material topics | Pages 20 and 21 |
| | | 2-4 Restatements of information | No material restatements in the period. Indicated on the document in the event of restatements of information. |
| | | 2-3 Reporting period, frequency and contact point | Report period: Financial year 2023<br>Frequency: Yearly<br>Date of issue: 29 February 2024<br>Contact point: investor@gco.com |
| | | 1 Foundation | Pages 5 and 79 |
| | | 2-5 External assurance | Page 92 |
| | | 206-1 (2016) Legal actions for anti-competitive behaviour, anti-trust and monopoly practices | In 2023, there have been 2 incidents of anti-competitive behaviour in the funeral business, one with a favourable judgement for GCO and another in process. (0 records in 2022). |
| | | 402-1 (2016) Minimum notice periods regarding operational changes | The minimum notice periods are established in the different collective agreements of the Organisation's employees. In countries that do not have a collective bargaining agreement, the applicable local laws are applied. |
| | | 404-3 (2016) Percentage of employees receiving regular performance and career development reviews | Page 38 |

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| | | 415-1 (2016) Contributions to political parties and/or representatives | As in 2022, no contributions have been made to political parties in 2023. |
| | | 417-2 (2016) Cases and non-compliances related to information and labelling of products and services | No cases of breaches of regulations or voluntary codes relating to product and service information and labelling have been recorded in 2022 or 2023. |

| Information requested by (EU) Regulation 2020/852, on Taxonomy | | References used | Page |
|---|---|---|---|
| Asset indicators | Template: The proportion of the insurance or reinsurance undertaking's investments that are directed at funding, or are associated with, Taxonomy-aligned in relation to total investments | Regulation (EU) 2020/852 on Taxonomy<br><br>Delegated Regulation (EU) 2021/2178 of the Commission, supplementing Regulation (EU) 2020/852, on Taxonomy – ANNEXES IX and X | Pages 68-71 |
| Non-life insurance premium indicators | Template: The underwriting KPI for non-life insurance and reinsurance undertakings | | Page 78 |
| Qualitative information | Qualitative information for market understanding of asset indicators and non-life insurance premium indicators. | Delegated Regulation (EU) 2021/2178 of the Commission, supplementing Regulation (EU) 2020/852 on Taxonomy - ANNEX XI | Pages 25, 28 and 77-79 |
| Information on nuclear energy and fossil gas | Standardized templates for disclosing information on exposures to the nuclear energy and fossil gas sectors. | Delegated Regulation (EU) 2021/2178 of the Commission, supplementing Regulation (EU) 2020/852 on Taxonomy - ANNEX III | Pages 71-76 |

# 07.

# External assurance report

# Grupo Catalana Occidente, S.A.
# and subsidiaries

Independent verification report
Consolidated Non-Financial Information Statement
31 December 2023

*This version of our report is a free translation of the original, which was prepared in Spanish. All possible care has been taken to ensure that the translation is an accurate representation of the original. However, in all matters of interpretation of information, views or opinions, the original language version of our report takes precedence over this translation.*

# Independent verification report

To the shareholders of Grupo Catalana Occidente, S.A.:

Pursuant to article 49 of the Code of Commerce, we have verified, with the scope of a limited assurance engagement, the Consolidated Non-Financial Information Statement for the year ended 31 December 2023 of Grupo Catalana Occidente, S.A. (Parent company) and subsidiaries (hereinafter Grupo Catalana Occidente or the Group) included in the accompanying 'Sustainability report - Non-Financial Information Statement' (hereinafter NFIS) which forms part of the Group's consolidated management report.

The content of the NFIS includes additional information to that required by current mercantile legislation in relation to non-financial information, which has not been covered by our verification work. In this respect, our work was limited solely to verifying the information identified in tables 'Appendix III NFIS content index' and 'Appendix II GRI content index' included in the accompanying NFIS.

## Responsibility of the directors of the Parent company

The preparation of the NFIS included in the Group's consolidated management report, and the content thereof, are the responsibility of the Board of Directors of Grupo Catalana Occidente, S.A. The NFIS has been drawn up in accordance with the provisions of current mercantile legislation and using as a reference the criteria of the Sustainability Reporting Standards of the Global Reporting Initiative ("GRI Standards") as per the details provided for each matter identified in tables 'Appendix III NFIS content index' and 'Appendix II GRI content index' included in the accompanying NFIS.

This responsibility also includes the design, implementation and maintenance of the internal control considered necessary to allow the NFIS to be free of material misstatement due to fraud or error.

The Board of Directors of Grupo Catalana Occidente, S.A. are also responsible for defining, implementing, adapting, and maintaining the management systems from which the information required to prepare the NFIS is obtained.

## Our independence and quality management

We have complied with the independence requirements and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) of the International Ethics Standards Board for Accountants (IESBA Code of Ethics) which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.



R. M. Madrid, hoja M-63.988, folio 75, tomo 9.267, libro 8.054, sección 3ª
Inscrita en el R.O.A.C. con el número S0242 - NIF: B-79031290

Our firm applies International Standard on Quality Management (ISQM) 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

The engagement team consisted of professionals specialising in Non-financial Information reviews, specifically in information on economic, social, and environmental performance.

## Our responsibility

Our responsibility is to express our conclusions in a limited assurance independent verification report based on the work we have performed. We carried out our work in accordance with the requirements laid down in the current International Standard on Assurance Engagements 3000 Revised, 'Assurance Engagements other than Audits or Reviews of Historical Financial Information' (ISAE) 3000 Revised, issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), in the Guidelines for verification engagements of the Non-Financial Information Statement issued by the Spanish Institute of Auditors ('Instituto de Censores Jurados de Cuentas de España').

In a limited assurance engagement, the procedures performed vary in nature and timing of execution, and are less extensive, than those carried out in a reasonable assurance engagement and accordingly, the assurance provided is also lower.

Our work consisted of posing questions to management as well as to the various units of the Group that were involved in the preparation of the NFIS, the review of the processes for compiling and validating the information presented in the NFIS, and applying certain analytical procedures and review procedures on a sample basis, as described below:

- Meetings with the Group personnel to understand the business model, policies and management approaches applied, principal risks relating to these matters and to obtain the information required for the external review.

- Analysis of the scope, relevance and integrity of the content of the NFIS for the year 2023, based on the materiality analysis carried out by the Group and described in section 'Materiality', taking into account the content required by current mercantile legislation.

- Analysis of the procedures used to compile and validate the information presented in the NFIS for the year 2023.

- Review of information relating to risks, policies and management approaches applied in relation to material matters presented in the NFIS for the year 2023.

- Verification, by means of sample testing, of the information related to the content of the NFIS for the year 2023 and that it was adequately compiled using data provided by the sources of information.

- Obtaining a management representation letter from the directors and management of Parent company.

## Conclusion

Based on the procedures performed in our verification and the evidence obtained, nothing has come to our attention that causes us to believe that the NFIS of Grupo Catalana Occidente, S.A. and subsidiaries for the year ended 31 December 2023 has not been prepared, in all material respects, in accordance with the provisions of current mercantile legislation and using as a reference the criteria of GRI as per the details provided for each matter in tables 'Appendix III NFIS content index' and 'Appendix II GRI content index' included in the accompanying NFIS.

## Emphasis of matter

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 relating to the establishment of a framework to facilitate sustainable investments, as well as the Delegated Acts promulgated in accordance with the provisions of the aforementioned Regulation, establish the obligation to disclose information on the manner and extent to which the company's investments are associated with eligible economic activities in relation to the environmental objectives of sustainable use and protection of water and marine resources, transition to a circular economy, prevention and control of pollution and protection and restoration of biodiversity and ecosystems (the rest of the environmental objectives), and in relation to certain new activities included in the objectives of climate change mitigation and adaptation to climate change, for the first time for the year 2023. The aforementioned regulation also establishes for the first time for the year 2023 the obligation to disclose information on the manner and extent to which the company's activities are associated with economic activities aligned with the activities included in the objectives of climate change mitigation and climate change adaptation, excluding the new activities mentioned above. Consequently, the NFIS does not include comparative information on alignment in relation to the objectives of climate change mitigation and climate change adaptation, nor does it include comparative information on eligibility in relation to the rest of the environmental objectives, nor in relation to the new activities included in the objectives of climate change mitigation and climate change adaptation. Furthermore, to the extent that the information referring to eligible activities in the year 2022 was not required with the same level of detail as in the year 2023, the information disclosed on eligibility is not strictly comparable either in the NFIS. In addition, it should be noted that the Board of Directors of Grupo Catalana Occidente, S.A. have incorporated information on the criteria that, in their opinion, allows for improved compliance with the aforementioned obligations and which is defined in section 'Appendix I Additional information' of the accompanying NFIS. Our conclusion has not been modified in relation to this matter.

## Use and distribution

This report has been drawn up in response to the requirement established in current Spanish mercantile legislation and therefore may not be suitable for other purposes and jurisdictions.

PricewaterhouseCoopers Auditores, S.L.

**PRICEWATERHOUSECOOPERS AUDITORES, S.L.**

Original in Spanish signed by
Margarita de Rosselló

29 February 2024

**www.gco.com**
For more information, contact:
investor@gco.com
+ 34 915 661 302