

URBASER CONSOLIDATED



4					
•	Letter from the CEO	04	9	Local communities	45
			40		
2	About this Non-Financial Statement	06	10	URBASER's professional team	52
3	About URBASER	12	11	Health and safety	62
A			40		
4	Our business model	14	12	Sustainable environmental management	66
_			40	•	
5	Strategic management	26	13	Innovation	76
6	Risks and opportunities	28	14	Suppliers	80
7			4		
	Ethics and corporate governance	39	15	NFIS 2018 Table of Requirements	82
0			40		
8	Human rights	43	16	Limited Assurance Report	94

communities

URBASER

professiona

and safety

Sustainable

environmenta

management



01 Letter from the CEO

At URBASER we are working to improve the information that we offer to our stakeholders. Accordingly, this Non-Financial Information Statement 2018 reflects the economic. social and environmental performance of URBASER S.A.U. and its dependent companies (hereinafter URBASER).

We closed 2018 as a success story. It has been a year of **important international expansion** for the company: we have broken onto markets such as Finland, Sweden or Norway, meaning that we are now present in 27 countries.

As a result of our activity, in 2018 URBASER obtained an EBITDA of 317 million euros and a total turnover of 1.851 million euros.

As the company's main business areas, Urban Services and Waste Treatment have generated good results during this tax year.

Within the Urban Services area, the effort, planning and resources invested in the development of this area internationally should be emphasised, which we are certain will bear their fruits in the short term.

In the waste treatment area, the important project of the "Guipúzcoa Environmental Complex" is worth mentioning. This development that has been awarded to our company will have a duration of 35 years. The project meets the maximum environmental requirements and uses the world's latest technology. The waste treatment area ended the year 2018 with a turnover of 665 million euros.

Our company is not only a leader in environmental services management, but also in its commitment to people; our employees, the citizens we serve, our customers and our suppliers. With 900 employees joining our staff, we now make up a total workforce of more than 40,000 people, without their work these results could not be reached, and we continue to rely on them to be able to reach new challenges.

We believe that it is possible to develop much more humanised cities, centred on the welfare of people. True to our **permanent innovation policy**, this year we have taken another step towards efficiency with the start-up of our "cloud IoT" (Internet of Things) platform, which allows us to manage all our assets: the fleet of vehicles, the industrial processes carried out in the waste and sewage treatment plants and the different assets around the city.

We understand innovation to be a constant process of continuously searching for new routes to turn waste into resources. All the rejects and sub-products have a potential value for us that take us a bit closer to the idea of a real circular economy.

With a portfolio of customers of 10,300 million euros, we are becoming consolidated as an international company, a leader in providing environmental services, with many years of experience, we are both customer-orientated and reliable. A forward-looking company that backs sustainable development, which will only be possible if economic growth,

the advance of society and protection of the environment are all addressed in a balanced way.



CEO of URBASER

Jose María López Piñol

Innovation



02 Regarding this non-financial statement

This Statement is aimed to meet the requirements set out by Law 11/2018 of the 28th of December, regarding the submission of a non-financial statement that includes the necessary information to understand the company's evolution, results, and current circumstances, as well as the impact of its activities on the environment and on society, and any issue regarding workforce management, compliance with human rights, and combating corruption and bribery.

The last Non-Financial Statement (NFIS) was published by the company in June 2018, and was included in the Integrated Statement 2017, which corresponded to the 2017 financial year.

The information included in this Non-Financial Statement refers to the economic **activities** and **services provided by URBASER over 2018**.

This statement has been developed under GRI (Global Reporting Initiative) Standards, with a focus on the management practices and indicators that address the requirements established by Law 11/2018 of the 28th of December 2018 (NFIS 2018 Table of Requirements).

All information contained in this Non-Financial Statement has been externally verified by PricewaterhouseCoopers Auditores S.L.

SCOPE OF THE INFORMATION

Scope of the financial information

This matches the integration parameters used during financial consolidation. It integrates all companies over which URBASER is the main shareholder or has management control.

Scope of the non-financial information

This covers the companies over which URBASER is the main or controlling shareholder and whose revenue is over 0.1% of the total revenue of the company. This implies that the information accounts for 95% of the company's total revenue. Therefore, among other data, employee data are affected: considering a total workforce of the company of 42,000 employees, of which only 32,146 employees are reflected in this NFIS.

The environmental information has the same scope as the financial information.

A verification and consolidation process for all collected data has been carried out from the URBASER head offices.

MATERIALITY AND STAKEHOLDERS

During 2018, URBASER updated its **materiality studies** based on on-line surveys sent to internal and external interest groups and stakeholders. This has helped identify and prioritise the existing economic, social, and environmental issues.

This year, the consultation process was expanded to include suppliers, trade unions, and the company's Committees for each of the stakeholders listed during the previous year. The figure below shows the results obtained from the materiality studies for Sustainability.



communities

URBASER professional team

Health and safety

environmenta management

Innovation

Sunnliers

6

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Letter from the CEO

NFIS 2018 | URBASER

NFIS 2018 | URBASER

Human rights

About this Non-Financial Statement

> About URBASER

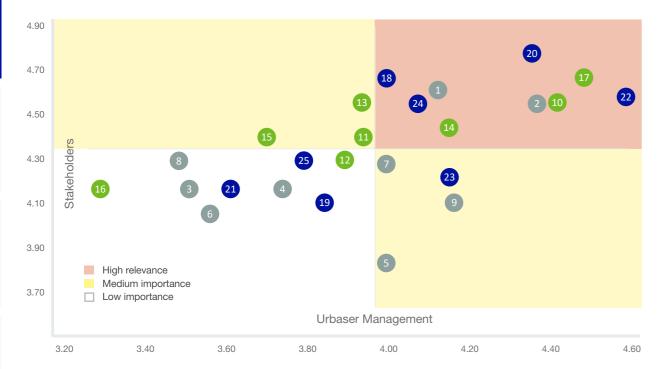
husiness model

Strategic management

Risks and opportunities

Ethics and corporate governance

MATERIALITY MATRIX



Economic dimension

- Compliance and business ethics
- Risk management by the company
- Sustainable investment
- Transparency and reporting
- Diversification of markets and services
- Sustainable procurement policy
- Management of indirect economic impacts
- R+D+i Management
- Business continuity plans

Environmental dimension

- 10. Environmental management system
- 11. Climate change and CO₂ emissions
- 12. Management, efficiency and energy generation
- 13. Efficient fleet management
- 14. Promotion of the Circular Economy in the management of treated waste
- management of the treated water cycle
- 16. Management and consumption of water in our own processes
- 17. Pollution prevention

Social Dimension

- 18. Team
- 19. Management of social inclusion of at-risk groups
- 20. Health and safety management
- 21. Supplier management
- 22. Customer management
- 23. Relationship with the local community
- 15. Promotion of the Circular Economy in the 24. Risks of vulnerability of human rights in our activity
 - 25. Risks of human rights violations in the supply chain

INDEX OF CONTENTS

Importance	Appearance	Chapter	Page
	Compliance and business ethics	07	37
	2. Risk management by the company	06	26
	10. Environmental management system	12	64
	14. Promotion of the Circular Economy in the management of treated waste	04	20
	17. Pollution prevention	12	68
	18. Team	10	50
	20. Health and safety management	11	60
	22. Customer management	07	39
	24. Risks of vulnerability of human rights in our activity	08	41
	5. Diversification of markets and services	03	13
	7. Management of indirect economic impacts	09	44
	9. Business continuity plans	04	24
	11. Climate change and CO ₂ emissions	12	67
	13. Management, efficiency and energy generation	12	67
	15. Promotion of the Circular Economy in the management of the treated water cycle	e 04	23
	23. Relationship with the local community	09	43

Derived from the materiality study, some issues were classified as being of very low materiality for the company, as they were valued as "with little relevance" for the strategy of URBASER, both by external and internal stakeholders. These issues are, therefore, reported very superficially or not reported at all in this NFIS.

From the additional requirements provided by Law 11/2018 of December 28, there are aspects which do not apply to our activity such as "Food waste" as well as "Consumer complaint procedures" in which, taking into account the company's main business activity, there is no direct contact with the consumer. Customers have specific complaint

Local communities

URBASER professional team

Health and safety

Sustainable environmenta management

Innovation

Suppliers

NFIS 2018 | URBASER

communities

URBASER

professional

About this Non-Financial Statement

> About URBASER

husiness model

Strategic management

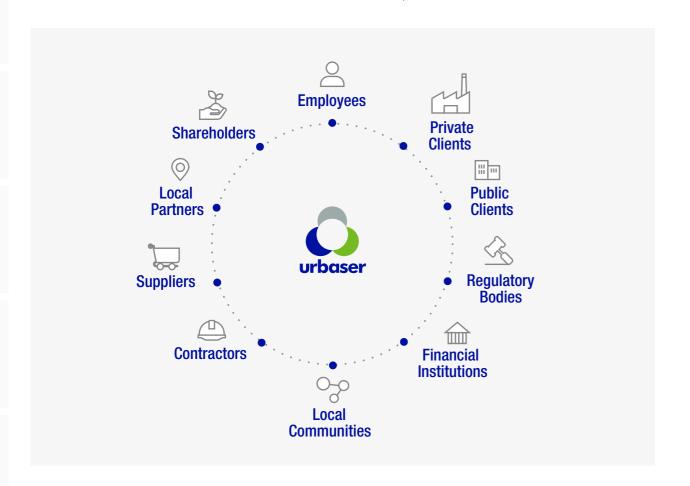
Risks and opportunities

Ethics and corporate governance channels specified on their contractual conditions. Moreover, URBASER makes available to its stakeholders complaint's channels, among which is the "Ethical Hotline".

For URBASER, stakeholders are the groups or individuals affected by the company's current or future actions. This definition includes external and internal

stakeholders, depending on whether they form part of URBASER's value chain or not.

The importance of the incorporation of the stakeholders in the decision-making processes is derived from the dynamics of the environments in which the company operates, allowing us to respond in a way that is adapted to requirements at all times and to the environment.



SUSTAINABLE GALS 17 GOALS TO TRANSFORM OUR WORLD

In an effort to meet the global challenges mentioned throughout this Non-Financial Statement, during 2016 the United Nations (UN) published the 17 Sustainable Development Goals (SDG), which cover 169 specific objectives to guide countries, citizens and companies towards minimising a series of globally occurring social, economic, and environmental problems.

URBASER has acquired a firm commitment towards supporting 7 of these goals, and throughout this Non-Financial Statement we will show the different achievements reached for each one during this year.

Through the services it provides and the activities it performs, URBASER directly contributes towards meeting some of these goals. In particular, the SDGs related to gender equality (SDG5), access to clean water (SDG6), decent work and economic growth (SDG8), reducing inequalities (SDG10), sustainable cities and communities (SDG11), sustainable production and consumption (SDG12) and marine life (SDG14). Up to a certain point, the company is also contributing towards meeting the rest of the SDGs through the initiatives listed in its Social Responsibility Action Plan.

This Non-Financial Statement will show the company's achievements on each one of these objectives for the 2018 financial year.

URBASER IS COMMITTED TO THE **FOLLOWING ODS:**

Innovation for sustainable environmental management

Responsible value chain

Contribution to the community



5 GENDER EQUALITY



14 LIFE BELOW WATER









Suppliers

10

Letter from the CEO

About this Non-Financial Statement

About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and corporate governance





03 About URBASER

ONE OF THE WORLD LEADERS IN ENVIRONMENTAL MANAGEMENT



4.6 Millions tCO₂



32,146 Employees



€ 4.5 Millions
Investment in security
and health



1,851 Millions



€ 1.5 Millions

Volume contributed for corporate citizenship



€ 26.2 Millions
Tax on profits



27Countries



€ 1.7 Millions
Public subsidies received

12

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Sales: € 141,247,648.80

COUNTRIES IN WHICH WE ARE PRESENT

FINLAND

Sales: € 1,162,644,764 Sales: € 28,200,048.57 Sales: € 15,685,400.60

PORTUGAL CHINA ARGENTINA

Sales: € 276,628.26 Sales: € 24,434.41 Sales: € 160,187,405.93

FRANCE OMAN CHILE

Sales: € 8,956,714.43

 UNITED KINGDOM
 JORDAN
 PERU

 Sales: € 85,289,862.99
 Sales: € 3,918,887.21
 Sales: € 77,674.50

ITALY BAHRAIN UNITED STATES

Sales: € 8,315,260.49 Sales: € 21,659,330.09 Sales: € 4,187,629.38

 SWEDEN
 VENEZUELA
 MOROCCO

 Sales: € 38,227,385.38
 Sales: € 21,941.41
 Sales: € 8,827,755.08

The sales data refer to consolidated sales by country. The countries that do not appear in the list have not made sales in 2018 or the company does not have the majority shareholding in the companies that render such services.

rights

Local communities

URBASER professional team

Health and safety

Sustainable environmenta management

Sales: € 165,236,568.21

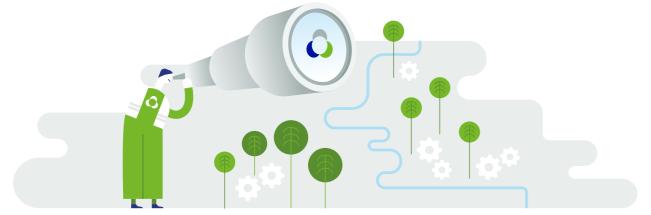
Innovation

Suppliers

Letter from the CEO

About this
Non-Financial

NFIS 2018 | URBASER



About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and corporate governance

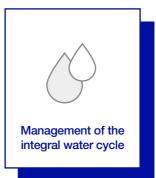
04 Our business model

URBASER is a world leader in environmental management, with a reliable and customer-oriented track record. As a company, it has a clear commitment to the future and invests in sustainable development from its four major business lines:









NFIS 2018 | URBASER

Profits (before taxes) by country in Euros

SPAIN	MEXICO		DMAN
€ 102,826,264.37	€-1,571,408		€ 3,234,894.29
ARGENTINA	MOROCCO	_	BAHRAIN
€ 16,202,145.80	€-52,061.76		£ 3,147,536.41
CHILE	UNITED KINGI		TALY
€-824,589.98	€-15,955,00		€ 675.58
FRANCE	INDIA	PORTUGAL	NETHERLANDS
€-6,639,555.86	€ 119,997.89	€ 4,975,321.35	€-5,350,607.03
VENEZUELA	UNITED STATES € 94,413.19	CHINA	NORWAY
€-68,439.29		€-584,395.82	€-4,982,240.46

Taxes on profits paid in 2018 (not accrued) in Euros

SPAIN € 10,739,205.51	FRANCE € 39,483.74	MEXICO € 443,643.25	UNITED KINGDOM € 3,644.40	ARGENTINA € 6,723,590.10
CHILE € 2,257,668.64	VENEZUELA € 831.18	MOROCCO € 187,912.75	ITALY € 366,644.58	PORTUGAL € 5,451,312.49
			Т	otal: 26,213,936.65

The United States, Oman, Bahrain, the Netherlands, Germany and Sweden have not paid income taxes.

communities

URBASER professional

Health and safety

Sustainable environmental management

Innovation

Suppliers

NFIS 2018 | URBASER

The Urban Services department is the largest of URBASER's business units, with a turnover of around 1,103 million euros. This unit comprises the following divisions:





About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and corporate governance





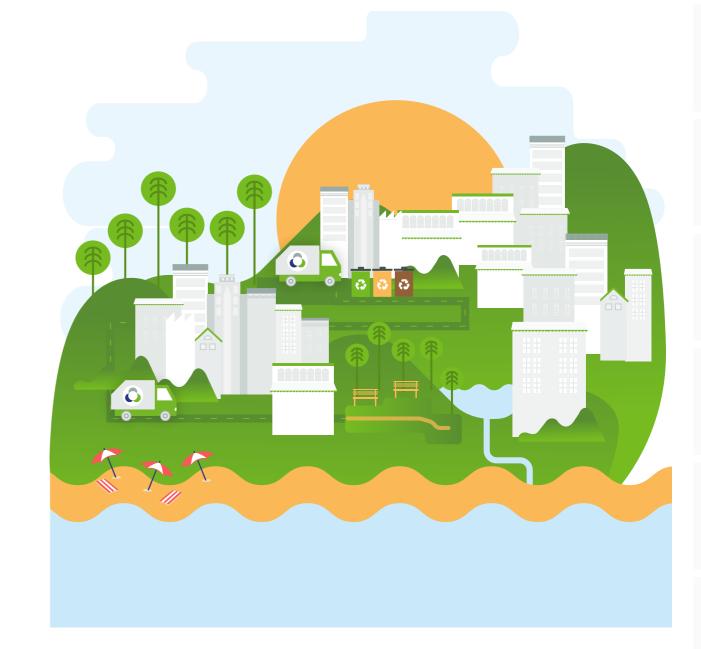


These are extremely sensitive services that directly affect the quality of life of millions of citizens around the world. By providing efficient services, we can **contribute towards sustainable development** in several cities and territories.

The collection of municipal waste is the first step of all waste management services. In addition, because of the costs associated with it and the complex logistics involves, it is also a key factor of any "Smart City" initiative, and one of the three main pillars of URBASER's innovation strategies.

OUR VALUES INCLUDE:

Providing economically-sound and service-oriented services to the public, by embracing the commitments made by all the territories in which we operate



Local communities

URBASER professional team

Health and safety

Sustainable environmenta management

Innovation

Sunnliers

By 2050, it is expected that approximately 70% of the world's population will live in urban areas and cities. How can we help towards creating more sustainable, smart, and resilient cities?

Smart cities

1 | Our goal



To provide a flexible and integrated solution for intelligent urban services.



A priority of the European Operational Implementation Plan for Smart Cities and Communities.

2 | How we do it



Disabled-adapted containers.



Zero-emission vehicles.



Electric vehicles.



100% renewable energy consumption in Spain.



IoT platform with Microsoft to manage all assets (personnel, machinery, etc.).



Movus: Subsidiary company providing sustainable urban mobility services.

3 | Management and planning

Improved management and planning of waste collection through intelligent algorithms:



Improved service to citizens.



Cost savings for public administration.



Overall environmental improvement.

4 | Gesmart

GESMART project, for greater control and efficiency:



Load **sensing** on municipal solid waste containers.



Control of resources through GPS (machinery and personnel).



Hardware for sensorization of waste collection and cleaning machinery (CO₂ emissions, driving, etc.).



Mobile devices for the street staff (becoming citizen support agents).















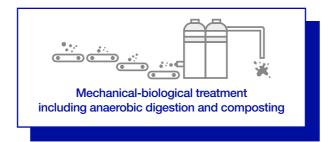
URBAN WASTE MANAGEMENT

URBASER is a leader in waste management and treatment and as such, it carries out design and financing activities in addition to the construction, commissioning, and maintenance of waste treatment and recycling facilities. For 2018, these activities represented a turnover of 666 million euros for the company.

This is URBASER's second largest business unit, and because of the high level of technical expertise possessed by its experts, it is the one that incorporates the largest amount of technological innovations into its processes.

The activities carried out in this business unit are also the ones with the highest environmental impact. This is why the company invests heavily in a culture of constant innovation across all its processes, which will enable the majority of waste to be recovered and will minimise the environmental impact of discarded waste, as well as controlling and ensuring flexibility when facing regulatory changes and guaranteeing that any applicable environmental regulations are respected at all times. In this way, waste treatment is fundamental to achieving the Circular Economy and to meeting the recycling goals set by the European Union.

This unit covers:





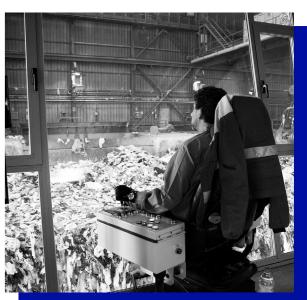












communities

URBASER professional

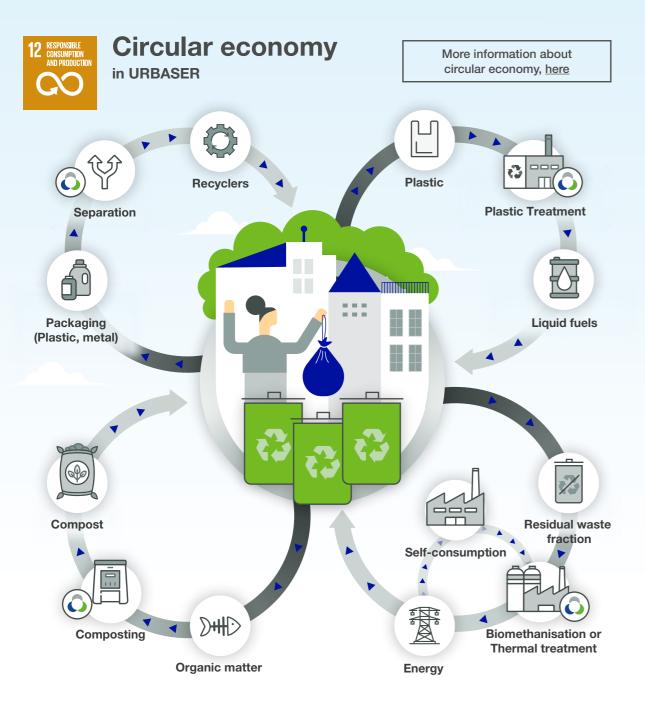
team

and safety

Sustainable environmental management

Innovation

Suppliers





CLOSING THE CIRCULAR ECONOMY CYCLE

The construction of "Guipuzcoa's Environmental Complex", which was awarded to the company Ekondakin (of which URBASER S.A.U. is a shareholder) began towards the end of 2017. Operations are expected to begin in March 2019, as soon as construction is finished. The operation contract will last for 35 years and was awarded to the UTE Ekobal joint venture (of which URBASER is the main shareholder).

The Project meets the highest environmental standards thanks to state-of-the-art technology. This will allow the facility's emissions to be well below the limits established by the European Union for these activities.

The new Guipuzcoa Environmental Complex will **progressively replace all the landfills in the area**. Its energy recovery facility will create wealth as well as energy, providing an alternative to fossil fuels on which Guipuzcoa is still completely dependent. In addition, its waste recycling

facility will treat all the solid waste from its energy recovery facility and will have a total capacity of 52,000 tonnes per year. Among other processes, this facility will develop a series of processes to transform solid waste into recycled dry goods that can be used in public works. This facility should produce enough dry goods to completely asphalt a 10-kilometre section of motorway.

Once operations have started, the energy produced by the energy recovery and bio/methane facilities will provide electricity to more than 45,000 homes. This will turn the Complex into Guipuzcoa's first renewable energy source.

The Guipuzcoa Project is based on European guidelines, and its main aims are **to reduce waste as much as possible** by supporting prevention and public awareness, and by treating waste as a resource by recovering recyclable materials and harnessing its energy.

NFIS 2018 | URBASER

About this Non-Financial Statement

Statement

URBASER

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its company,

About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and corporate governance

INDUSTRIAL WASTE TREATMENT

URBASER manages the Industrial Waste Treatment area through its company, "Sertego Servicios Medioam-



bientales S.L.U." Sertego is a leader in integral and sustainable management of hazardous and non-hazardous industrial waste that takes care of its collection, transport, treatment, processing, recovery, regeneration and elimination.

The management and recovery of industrial waste has become highly relevant, with the development of mandatory national and international legislation. Sertego aspires to be one step ahead of the environmental legislation, opting for progress and care of the environment in all its practices.

One of the main direct, positive impacts of the activity performed by this company is the **prevention of dumping** and sea spillages. Sertego manages, treats and recovers the waste oil generated by ships in 27 different ports, preventing this waste from being dumped into the sea and minimising its environmental impact, by making new fuels out of this, which is then reintroduced onto the market.

Furthermore, industrial lubricants are created through the regeneration of used oils, preventing these oils from being used as fuel in incineration plants and therefore also avoiding the resulting emissions caused by this process. In 2018, 75,000 metric tonnes (Tm) of fuel was reintroduced onto the market.

PORT OF ALGECIRAS BAY (Spain)

The Port of Ageciras Bay has been designated **the second most productive European port**. An award obtained at the "IHS Markit Dredging and Port Construction Innovation Awards" which acknowledges its impressive commercial activity.

Its management policies balance out economic development, conservation of the natural resources and the quality of life of its social environment. Such is the case that in March 2016, the **Environmental Control Office** (OCMA in its Spanish acronym), was created, an organisation in charge of controlling the environmental impact of all the port's activities. One of the most important tasks in this field is the treatment of MARPOL waste (the management of waste from ships to prevent it from being dumped into the sea). The ports of the Algeciras Bay and Tarifa are at the leading edge regarding waste and waste oil management.

Sertego has been providing this service in the Port of Algeciras for over two decades, thanks to some treatment installations that can store 10,000 m³ of waste. Additionally, it also offers a waste oil collection service (using barges and tankers) and the collection, treatment and regeneration of used oils generated by fishing vessels and pleasure boats.

WATER TREATMENT

Socamex S.A. is a company that belongs to URBASER, it has been dedicated to the **integral management** of the water cycle for over 25 years. This business area is the smallest of the Company's four areas, with a turnover in 2018 of around 48 million euros. Its activity is mainly centred in Spain and South America.

Socamex performs the design, construction, maintenance and development of sewage treatment and water purification plants, water treatment and sewage treatment installations, as well as technical assistance for companies, municipalities and communities.

Socamex's activity contributes to the **sustainable development and to the improvement in the quality of the water**, guaranteeing public access to a basic resource, ensuring that when the water returns to the natural environment, it does so in the same conditions in which it was collected.

WATER PURIFICATION IN ARAGON (Spain)

Socamex plays an important role in **waste water purification** in the Autonomous Community of Aragon (Spain) through two water concessions that supply 25 municipalities in the region.

The work carried out by the concession, of which Socamex is a majority shareholder, consisted of the drafting of the project, funding, construction and development of twelve water purification plants in the region of Monegros, located in the provinces of Huesca and Zaragoza.

The water purification plants supply an estimated population of **30,000 equivalent inhabitants** and has a capacity of 9,000 m³/day. Implementation of the contract started in December 2005 with the drafting of the Construction Project and currently these facilities are up and running and they will remain in use until the year 2028.

communities

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers



Mission, vision and values



Our **mission** is to contribute to the **sustainable development** of cities and territories through efficient services and **innovative technologies**.



Our **vision** is to be a benchmark for the society and a global leader in solutions for **circular economy, environmental management** and the generation of responses to new **research challenges** in these fields.

Our values



Responsible operations: managing at all times the **health** and **safety** of a qualified human team, and maintaining integral and ethical relationships with our stakeholders.



Sustainable communities: providing financial solvency and vocation to the services we provide to **citizens, being committed** to the commitments the territories in which we operate.



Circular economy: respecting the value of **natural resources** and the environment and betting on solutions for **transforming waste** into resources through innovation and the latest technologies.

Strategic management

Business plan strategy



To maintain a **leadership position** in the Spanish market.



Consolidate market share.



Continue the **Company internationalization**.



Participation in multilateral projects.



From waste to resource: commercialize products derived from the treatment of industrial waste.

Transformation



Automation and **systematization** of the Service Management (Urban Services and Waste Treatment service management process).



Data analytics (provide Urbaser with the necessary tools to analyze data in a global way).



Redefinition of the Company's key **processes** (Purchasing Process, Contracting Process, etc.).



Paperless Policy.



Promotion of an internal cultural change.

CSR Action Plan 2018-2023



Ethics, compliance and corporate governance.



Responsible value chain.



Innovation for sustainable environmental management.



Contribution to the **community.**



Commitment to SDGs* directly related to our business.

* Sustainable Development Goals



06 Risks and opportunities

RISKS INHERENT TO THE COMPANY'S ACTIVITIES

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URBASER's businesses are centred on the urban and environmental sector. The company operates in different countries and has decentralised its operations. This allows each of its subsidiaries to operate with a large degree of independence.

Nowadays, this market is facing a period of great change due to new legislation in the environmental and social fields. Waste management, water resources and climate change have led to ever-tightening restrictions. Likewise, diversity and work and social integration also directly impact our actions and decisions across the globe.

Within this changing context, the company is aware of the importance of implementing a suitable and efficient policy to manage the different risks that may affect its operations. Therefore, URBASER analyses, supervises, and manages the risks and opportunities it is facing through an identification, assessment, management, and supervision process that implements a series of preventative and mitigating measures. In turn, these are based on the following principles:

• Integrating a risk-based vision both within its internal governance bodies and its business management process, through a risk-mitigation focus.

 Defining basic directives that will standardise the functional criteria across different business units and achieve improved levels of internal control.

- Establishing mechanisms to identify, evaluate, analyse, inform, and reasonably control the different risks that its activities are exposed to.
- Including the different businesses and corporate divisions within the company in the risk management, supervision, and auditing process, as agents with different levels of responsibility.
- Maintaining an adequate level of independence between the risk-taking divisions and those in charge of analysing, controlling, and supervising such risks.
- Ensuring compliance with both legislation and the guidelines included in the Company's Code of Conduct under the "zero tolerance" policy towards illegal acts.
- Promoting continuous improvements in efficiency and crisis response tactics, strengthening and facing critical situations with flexibility.
- Protecting the company's reputation and bottom line, generating trust, and providing guarantees for stakeholders.
- Reaching strategic objectives under controlled volatility.

Risks and opportunities are evaluated in quantitative and/or qualitative terms, with contributions from the different areas and divisions within the company, based on the "impact" and "probability" of each item. In this way:

- Low-level risks may not warrant additional action plans.
- Mid-level risks will be analysed according to the company's risk-taking strategies.
- High-level risks will require appropriate management and control.



URBASER professiona team

communities

and safety

management

Innovation

Non-Financial

Statement

The company's risk management system includes a series of control measures aimed at detecting and mitigating any aspects that must be complied with, such as improper behaviours or the violation of any applicable legislation. This is carried out under a model with three independent levels of defence that act in a coordinated way. The first level corresponds to the activities of each at-risk division, while the second and third levels come from different transversal functions, with specific internal control and supervision responsibilities which are managed on a corporate level.

The URBASER Steering Committee validates and approves all risk management procedures, and, if necessary, establishes suitable mechanisms that monitor them and keep them within the defined levels. The CEO will approve corporate policies and any related control systems.

The main function of Internal Auditing Management is to support the Steering Committee and the CEO with their general risk surveillance, supervision, monitoring, and mitigation content, as well as the company's internal auditing procedures. Any warnings, recommendations and conclusions created through this process are then sent on to URBASER's Management and to the heads of any relevant departments.

The risks and opportunities described below belong to the different subsidiaries, joint ventures, and companies within URBASER that operate inside Spain. The company is currently working to update its non-financial risk list and to expand it throughout its international operations over the

next two years. In this process no differentiation has been made between short/medium/long term risks. The shortterm risks have been considered.

The risk factors that generally affect URBASER as a consequence of changes in the competitive, economic, political, legal, regulatory, social, environmental, business and financial circumstances, include:

1 Operating Risks:

These include any risks associated to key business processes, including those linked to contracting and outsourcing, relationships with clients or any credit awarded to them, service quality, environmental risks, purchasing and supplies, as well as those associated to business support processes, including the risks related to prevention, health and safety in the workplace, human resources, compliance with local regulations and specific accountability practices.

URBASER's activities are, generally speaking, subjected to specific risks linked to its urban and industrial waste management facilities, waste transport, operation management, natural disasters, organisational management and its employees. Some of these risks are outside URBASER's control.





Pollution and climate change:

As established by its Corporate Policies on Quality, Health and Safety, Environment, and Energy, URBASER contributes to mitigating climate change through a series of measures aimed at preventing atmospheric emissions.

Among others, regular internal and external controls are performed on activities that could potentially contaminate the air. In turn, these are subject to authorisation and/ or notification to the relevant public administrations. In addition, proper maintenance is performed on machinery, power generation units, climate control facilities, and compressors.

The largest source of emissions originates from waste landfills. In order to minimise the greenhouse effect of bio-gases (especially methane) created by landfills, Spanish legislation demands all landfills to be degasified by

capturing any biogas and either burning it or using it to create energy (Royal Decree 1481/2001). URBASER operates any landfills according to the conditions established by clients and contracting bodies, and therefore, the final decision regarding these gases lies with the contracting body. The climate risk is then considered to fall outside of the company's purview.

URBASER takes specific measures to prevent or avoid any risks that may impact people or the environment, and, in cases where this is not possible, to reduce these risks down to a reasonable level. The company creates procedures to measure noise pollution levels and ensures adequate maintenance and technical inspections of any mobile equipment in order to reduce the amount of noise generated by them as much as possible. In addition, IPPC activities have established methods and controls relating to noise pollution. In the hypothetical case of accidental spills or discharges, the company has acting guidelines that combine action measures, reparations, and remediation.

communities

URBASER professiona team

and safety

Sustainable environmenta management

NFIS 2018 | URBASER

rights

About this Non-Financial Statement

URBASER

husiness

model

management

Risks and

opportunities

Protection of biodiversity:

Any activities developed inside protected areas carry a higher risk of potential environmental impact.

While performing works, operating landfills and providing any services that entail industrial waste management or the collection and treatment of oils and fuels, there is a significant risk of accidental spills. In order to handle these circumstances, URBASER has different environmental management systems that help the company manage voluntary discharge permits (therefore ensuring that all discharges have the necessary approval), managing storage practices for dangerous substances, defining preventative measures for occasional spillage and discharges, establishing regular water quality controls, etc.

In different ports in Spain, Sertego (a company belonging to URBASER) manages MARPOL I waste, which arises as a result of the International Convention for the Prevention of Pollution in the Seas. As a result of the activities carried out by the company, and in the case of the established safety measures not being respected, there could be a risk of fuel dumping into the marine environment during the provision of the MARPOL service either on land or sea. To mitigate this risk, controls have been established, along with a detailed procedure to be followed by the skipper of the ship and the professionals from Sertego for the collection hose coupling process. Additionally, regular checks are carried on the maintenance of the equipment.

In spite of the low probability of this risk, it could involve a highly significant impact as it could cause the pollution of marine ecosystems. The company has **contingency plans** that describe in detail how to act in the case of MARPOL spillages in the sea occurring during the provision of the MARPOL service.



• Sustainable use of resources

According to its Corporate Policy on Quality, Health and Safety, Environment and Energy, URBASER is committed to the efficient **use of energy and raw materials**, therefore respecting the value of natural resources.

The company has an Energy Management System that includes several measures and detailed guidelines aimed at improving its performance and energy efficiency, as well as reducing its impact on climate change.

In regard to URBASER's water consumption, it is important to highlight the fact that the company's main economic activities (waste collection and treatment) carry a very limited water consumption. Therefore, this carries a low risk level for the company. Nevertheless, for activities such as street cleaning or landscaping that require more intensive water consumption, the company adheres to good practices such as using recycled water, devices to reduce consumption, etc.



 Company's commitment to sustainable development

As stated by the company's Corporate Citizenship Policy, URBASER is aware of its role within the communities where it operates. Through its corporate citizenship initiatives, the company performs a series of activities with a positive impact on its surroundings, guided by shared **values and respectful relationships** with local communities.

This Policy defines the scope of URBASER's corporate citizenship policies, which translate into company-wide directives that are applied through specific procedures. This ensures they are complied with.

URBASER's actions are guided by the principles and behaviours listed in this Code of Conduct and the company's Corporate Social Responsibility Policy, which in turn provide a framework for the company's Corporate Citizenship Policy. URBASER ensures that all corporate citizenship initiatives comply with all current applicable legislation for all jurisdictions where it operates, as well as by its own ethical principles.

In Spain, the company is currently facing a series of legislative changes inside the Autonomous Communities where it operates. There is a strong tendency to **support local communities and markets** which favour hiring local citizens, purchasing from local suppliers, etc. For a

company like URBASER, which is present across several countries and must adapt to different international strategies, this could potentially carry future negative consequences, as it would lose some negotiating power with nation-wide suppliers.

URBASER

communities

URBASER professional team

Health and safety

Sustainable environmental management

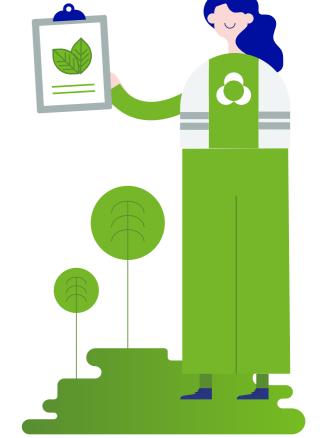
Innovation

iiiovatioii

Ethics and corporate

governance

Suppliers



2 | Legal Compliance Risks :

These include any risks that may derive from Corporate Governance, social litigation, regulations, data protection legislation, possible changes to tax regulations (whether national or international), and civil responsibility regarding the integrity of its property.



Combating corruption, bribery and money laundering

Specifically, when developing its economic activities, the company's risk may derive mainly from the way in which it maintains relationships with public officials as a consequence of the way that public bidding processes are organised in each location and the possible incidents that may develop during the contract management stage. On the other hand, because of the high degree of operational decentralisation and the ability of each division to operate independently, risk may also be developed from the relationships maintained with suppliers and authorities (specifically port, environmental, or labour regulatory bodies).

In order to mitigate these risks, the **company has a Crime Prevention Model**, whose purpose is to prevent any crimes from being committed and to prevent any legal responsibility vis-à-vis the company. In order to ensure this model is complied with, URBASER created a Legal Compliance Committee (LCC) which is responsible for safeguarding the company's ethical principles

and detecting or mitigating any violations of applicable local regulations or inappropriate conduct. This Committee reports directly to the Board of Directors.

URBASER has its own binding **Code of Conduct**, which must be respected by all its employees, regardless of their type of contract or position. The purpose of this Code is to establish a framework to understand and apply all the principles, behaviours and expectations that the company has with all its employees in regard to loyalty, good faith, integrity, respect for local legislation, and ethical values.

Through its **Legal Compliance Policy**, URBASER contributes on the one hand to strengthening the company's commitment to good corporate governance; and on the other hand, it diligently enforces due controls across the entire organisation, minimising as much as possible any potential incidents where poor practices or regulatory violations may occur as part of our activities.

We are aware of our role in the development of the communities in which we operate. Considering that, through its corporate citizenship, the company must perform activities that generate a positive impact on its surroundings, URBASER has created a **corporate citizenship Policy** that establishes a series of directives and principles to act on these matters, safeguarding compliance with current legislation and reflecting the company's ethical principles. Based on this Policy, URBASER has also created procedures and control mechanisms to regulate the approval and monitoring of any collaborative corporate citizenship projects that may arise, either with public bodies or other private companies. In this sense,

34



the company has carried out a comprehensive assessment of all the bodies with which is wishes to cooperate, as well as the corporate citizenship areas where it wishes to contribute. Any contributions made by URBASER to corporate citizenship projects are continuously monitored.

URBASER has also developed an Anti-Corruption Policy with the aim of promoting a culture of compliance and one of fighting corruption, bribery and other illegal practices. In this Policy, a series of guidelines are described which must be followed by all company employees whenever interacting with Public Administration officials (considering that 80% of URBASER's turnover comes from public sector clients) and with private company administrators.

In order to facilitate the reporting of any possible suspicious

behaviour that could be in violation of the guidelines established in UBASER's Code of Conduct, the company has an Internal Communication and Reporting Channel. Any employee, client, supplier, partner, and member of the affected communities can address their concerns to:

canaletico@URBASER.com

In order to safeguard the efficient application of internal policies and procedures, URBASER has established a **Disciplinary Procedure** that is applied across the company, where all the possible violations and sanctions that entail legal risks for the company are listed.

3 | Reputational Risks:

These include risks derived from the inability to meet the expectations set by stakeholders and risks from failing to achieve the desired degree of recognition.



Subcontracting and suppliers

Aware that it cannot control the actions of third parties, URBASER nevertheless aims to ensure that all companies and people that enter into business with the company meet the same standards and ethical principles. This is particularly important where it concerns suppliers, agents, consultants and subcontracting companies.

In 2018, the entire supply and purchase model underwent a full revision. This entailed organisational changes, as

Local communities

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

Ethics and corporate governance

tractors and suppliers. At the end of 2018, the company introduced its new Code of Ethics for Suppliers, which aims to establish stable and long-lasting commercial relationships based on honesty, transparency, and trust. This will prevent any behaviour that could compromise URBASER's reputation, as well as the potential negative consequences for the company or its environment.

well as new management practices to deal with subcon-

The company will continue working throughout 2019 and 2020 to disseminate this Code, and to define a supplier certification and auditing process that will mitigate the high risk that any of its suppliers or subcontractors may fail to meet the expectations regarding sustainability. This will be accomplished by implementing the evaluation and follow/up tools.



* The issue of combating food waste does not apply to URBASER because of the nature of its activities and its impact on society.

4 Other risks:

Thanks to the company's control mechanisms, other inherent risks that have been detected have been regarded as unlikely to occur or as having very limited impact. Therefore, URBASER has classified them as "low risk". They are described in the following chapters:

- Circular economy and waste management and prevention
- Health and safety
- Social relationships
- Universal accessibility for people with disabilities
- Equality
- Respect for human rights
- Consumer relations (referring to the claim procedures, taking into account the company's main business activity, URBASER S.A.U is not in direct contact with the consumers. Customers have specific methods for making claims in their contractual conditions and URBASER S.A.U. has channels for claims like the "Ethical Hotline" that is available for is stakeholders.)
- Tax information

TRANSFORMING GLOBAL CHALLENGES INTO OPPORTUNITIES

Population grown and urbanisation

The ongoing challenges in sustainable development will be progressively greater and more concentrated inside cities. Proper resource and waste management will be fundamental to preserving health, the environment, and quality of life.

The per capita creation of solid waste continues to grow and to vary in its content: electronic waste has doubled, and food derivatives have increased. There is large opportunity for growth in the waste management sector, as well as an ongoing need for specialised treatment.

Promotion of the circular economy

In 2015, the European Commission adopted an ambitious regulation package regarding circular economies. The package covers an action plan for the European Union, with measures that affect the entire life cycle of consumables: from design to supply,

Population projected by the United Nations 2030



^{*} Source: United Nations http://www.un.org/es/sections/issues-depth/population/index.html

production, consumption, waste management and the secondary raw material market.

Within this framework, the first European Strategy on Plastic Waste was approved in January 2018. One of its goals was to ensure that by 2025, 10 million tonnes of recycled plastic products will be repurposed into new products for the European market.

It should be noted that URBASER has a vested interest in the development of a <u>circular economy</u>. Proof of this is its participation in the Pact for a Circular Economy promoted by the Ministry of Agriculture, Fisheries, Food, and the Environment. Through technological innovation, URBASER can guarantee and contribute to the society's sustainable development, pursuing the goal of building a circular economy that is an irreplaceable part of the transformation cycle of waste into new raw matter, therefore preventing its disposal in landfills. By collaborating with Administrations, universities, and Companies, the Group is investing in the improvement of all its waste management processes, the reduction of its environmental impact, and the improvement of the quality of life for citizens in general.

European Union objectives for 2035



65% Urban waste prepared for reuse or recycling

10% Urban waste deposited in landfills

Local

communities

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

NFIS 2018 | URBASER

About this Non-Financial Statement

> About URBASER

Our business model

Strategic managemen

Risks and opportunities

Ethics and corporate governance

Climate change

The 21st Conference of the Parties of the United Nations Framework Convention on Climate Change (COP21) was held from 30 November to 12 December 2018 and resulted in the adoption of the Paris Agreement, which established a global framework to fight climate change from 2020 onwards. This agreement was a historic landmark in the fight against climate change and promotes a transition towards a low-emission economy that is resilient against the effects of global warming. The Clima Projects are initiatives aimed at reducing Greenhouse Gas (GHG) emissions developed in Spain, and promoted by the Carbon Fund for a Sustainable Economy (FES-CO₂). They were created to act as a

pathway to transform the Spanish economic system into a low-carbon model.

URBASER has <u>7 approved Clima Projects</u> underway, and by the end of 2018 it aims to deliver a total 34,132 tCO₂e to the FES-CO₂ as verified emission reduction (VER) from the different landfills it manages.

In addition, URBASER, when acting as an Energy Services company, develops different energy efficiency projects, provides maintenance for public lighting infrastructure, building installations in public buildings, and installs charging stations for electric vehicles.





07 Ethics and corporate governance

Governance within URBASER is guided by the principles of efficacy, efficiency, and transparency in decision making. This contributes to the company's profitability and its sustainable development.

CORPORATE GOVERNANCE

Within URBASER, governance is implemented through a series of corporate standards, policies, and procedures, which aim to guide a decision-making process that is responsible and guarantees proper functioning within the company.

The Company's Articles of Association set out all the different regulations that govern its internal functioning.

The main governing body, the Board of Directors, is the entity responsible for the supervision, evaluation and monitoring of all URBASER's strategies. Its main goal is to seek profits through economic activities that generate long-term value. Another pillar of URBASER's good governance model is compliance and internal auditing, which develop and implement regulations and checks that guarantee that best practices are always kept by the company.



In 2018, the Board of Directors met 6 times and with

100% attendance

URBASER professional team

Health and safety

Sustainable environmenta management

Innovation

Sunnliers

NFIS 2018 | URBASER

About this Non-Financial Statement

SHAREHOLDERS

100% of URBASER S.A.U. shares belong to "Firion Investments S.L." since December 2016

GOVERNING STRUCTURE: Decision-making process

About URBASER

business model

Strategic management

Risks and opportunities

Ethics and corporate governance

Board of directors **Chief Executive Officer Steering Committee**

Composition of the Board of Directors

Shengijun Yan

Board member

Secretary Eduardo Domínguez-Adame Bozzano

José María López Piñol

Vice-Chairman

Managing Director

Board member José Jaime Isern Aleari

Juan Evaristo

Fábregas Sasiaín

Board member M. Sioen Herman Maurits

E Executive

Proprietary

Independent

All members of the Board of Directors are men. Four of them are over 50 years of age, and one of them is between 30 and 50 years of age.

BOARD OF DIRECTORS REMUNERATION POLICY

The Company's Sole Proprietor approved, in accordance to the Articles of Association, a maximum amount for the remuneration of the members of the Board of Directors.

TIRME, FIRST WASTE TREATMENT **COMPANY TO RECEIVE 'GOOD GOVERNANCE**' CERTIFICATE

In July 2018, Tirme, a company with 80% participation by URBASER, received the certificate accrediting that the company.

In this way, Tirme has become the first company from the Balearic Isles and the first waste treatment company in Spain to obtain this certificate, in line with this it has implanted a management system based on the principles of transparency and good governance and on the promotion of a an ethical culture in the development of its activity, with the leading companies in the country, with regard to transparency and good governance.

CODE OF CONDUCT

URBASER has its own Code of Conduct, which has been updated and reinforced during 2018. The purpose of the code of conduct is to establish the ethical principles and acting guidelines that must rule its activities and business relationships, both on an internal level (which refers to all its employees, directors and managers; and an external level) which refers to the market and its competitors.

Furthermore, this code seeks to facilitate the development of daily activities in an ethical, serious, professional and honest environment, in keeping with the most basic contractual good faith principles and current legislation.

INTERNAL CHANNEL FOR COMMUNICATIONS AND COMPLAINTS

All employees, clients, suppliers, partners, and members of the communities in which we operate can use the "Ethical Hotline" available in each country, to send alerts regarding possible non-compliance with the principles acknowledged by the Code of Conduct.



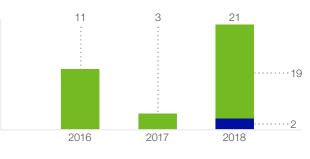
During 2018, a total of 21 communications were received through the "Ethical Hotline" and other formal complaint mechanisms.

Nature of the communications received in 2018

in percentage (%) Code of Conduct Harassment Channel Anti-corruption Human rights

Communications received through complaint channels

number



Resolved investigations Investigations pending resolution



993.5

Hours of training provided on the Code of Conduct in 2018.



2019 Goal: consolidating URBASER's ethical culture using awareness initiatives and information about the Code of Conduct and the "Ethical Hotline".

Local communities

URBASER professional team

Health and safety

Sustainable environmenta management

Innovation

Suppliers

In order to prevent corruption, money laundering and bribery, URBASER has an anti-corruption policy with the express objective of promoting a corporate culture of compliance and actively fighting against corruption, bribery and other unlawful behaviours.

In Spain, the company has a Crime Prevention Model, which is a structured control system created to mitigate the risk of crimes that could create legal responsibilities for the company, including those that refer to acts of corruption. In 2018, this Model had been disseminated to all technical and administrative workforce, and to all Directors and Governance bodies in the company. In addition, 365 employees received specific training on this Model (304 technicians and administrative staff, 55 managers, and all 6 members of the Steering Committee).

In order to give effect to this Model, URBASER has created Legal Compliance Bodies in the different countries, which are responsible for ensuring the respect for the company's ethics, as well as detecting and mitigating any breaches of the applicable legislation and misconduct.

In Spain, the Legal Compliance Committee (LCC) reports directly to the Board of Directors.

The company has also established an "Internal Investigations" procedure to investigate any possible illegal conduct attributable to the companies, in order to prevent the risk of this possibility occurring. During 2018, there have been no cases of corruption, no employee has been laid off because of corrupt acts, and no disciplinary measures have been taken in this regard. No cases were confirmed where contracts were terminated because of violations related to corruption, and no public charges linked to corruption were presented against the company or its employees.





08 Human rights

Through its Code of Conduct, the Corporate Social Responsibility Policy, and its Health and Safety Policy, URBASER is committed to ensuring the respect to human rights and public freedoms, as described in the United Nations Universal Declaration of Human Rights.

The responsibility of safeguarding human rights falls on every person and corporation to which the Corporate Policies and Code of Conduct apply.

Likewise, the company holds the 10 principles of the United Nations Global Compact as basic guidelines for its behaviour. In that sense, during 2019, work will be done to implement a programme that will ensure respect, protection, and remedial strategies for human rights across all the company's economic activities and regions where it operates. The process to approve and launch

a new method for the identification and assessment of sustainability risks, which includes the risks associated with human rights in Spain, was started during 2018.

For the supply chain, URBASER uses its Code of Conduct for URBASER Suppliers as its basic guidelines. This document includes a series of ethical principles for suppliers, contractors and external partners regarding the rejection and elimination of forced or coerced labour, child labour, and discrimination, among other things.

All employees, clients, suppliers, partners, and members of the communities in which URBASER operates can use the "Ethical Hotline" available in each country, to notify the company of any possible violations of the principles included in our Code of Conduct.

Local communities

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

Suppliers

NFIS 2018 | URBASER

rights

About this Non-Financial Statement

URBASER

During 2018, no notifications regarding human rights violations were received through the "Ethical Hotline" or any other formal complaint mechanisms.

2019 Goal: Review of the categories and analysis of the Human Rights risks related to the countries where the company operates.

URBASER, as set out in its Code of Conduct, is committed to enforcing the principles of the United Nations Global Compact. In accordance with these principles, URBASER makes it an essential condition for all its branches and subsidiary companies outside Spain, as well as the companies in the supply chain, not to engage in practices that may entail forced, coerced, or child labour.

Likewise, even in the countries where we operate that have not signed any international ILO agreements, URBASER is committed to respecting the human rights of the people belonging to the most vulnerable groups, regardless of the place where it operates, in all the activities it performs in these countries.



Strategic management

Risks and opportunities

Ethics and corporate governance





09 Local communities

CORPORATE CITIZENSHIP

URBASER is aware of its role in the development of the communities in which it operates. Through its corporate citizenship initiatives, the company is able to perform actions that generate a positive social impact on its surrounding environment.

The corporate citizenship activities performed by URBASER are developed according to the company's economic activities. During 2018, URBASER developed a corporate citizenship Policy that sets out all principles and behaviours listed in its Code of Conduct, and in the guidelines that govern its corporate responsibility. This Policy includes all the actions and contributions made voluntarily by URBASER for the benefit of the communities, the sole purpose of which is to have a positive impact on social welfare.



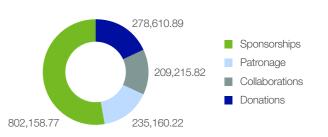
1,525,145.70

Euros dedicated by URBASER to its global corporate citizenship activities.

Breakdown of contributions made in 2018 by area (in percentages)	
Local communities	29%
Environmental awareness	21%
Supporting culture and sports 50%	

Contributions made in 2018 by action type

in euros (€)



It is understood that the donations made to foundations and non-profit organisations are included under "Donations".

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

Socio-economic impact of URBASER in the communities

Within the framework of the Corporate Social Responsibility Action Plan 2018-20123, URBASER sets the goal of lining up 100% of the social contribution in accordance with the areas established in the corporate citizenship Policy, looking forward to generate an even more significant socio-economic impact in the communities where it operates:

Jobs globally

The activity of the Company is a clear engine of wealth and economic and social development: it creates stable, quality employment.



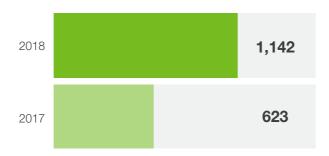
Creation of local employment: **Volume of purchases from local suppliers** in millions of euros



People who benefitted from **corporate citizenship initiatives**



Number of **new contracts**



Tax contribution in euros (Tax on accrued corporate income)



Improvement in the living conditions of the **Communities**

In 2018 we contributed **1.5** million euros in corporate citizenship activities



Improved of public infrastructures



Fluid communication between the communities and the company to resolve **complaints and queries**



Integration into the labour market of people at risk of **social exclusion**



Health promotion through **sports**

€ 759,342 contributed to the promotion of culture and sports



Environmental awareness to all types of groups



NFIS 2018 | URBASER

About this Non-Financial Statement

> About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and corporate governance

TAKING CARE OF DISADVANTAGED FAMILIES IN AQABA (Jordan)

Aqaba is the only place in Jordan with access to the sea and is a local tourist attraction. The month of Ramadan sees significant tourist activity, therefore the hotels and restaurants offer *iftar* (or holy breakfast) buffet meals throughout the month. All the food that is not eaten during the day would end up being thrown away if it were not for the work of URBASER's employees in Jordan, who, for these 30 days, spend their time taking this food from the hotels to the families most in need, and therefore preventing it from ending up in the rubbish.

In this way, there is a reduction of many tonnes of food waste during the month of Ramadan and we provide a decent breakfast for the people most in need in the community.

The company's workers pack the food up in individual, homogeneous packets and use their vans to take the food to a local NGO that helps those who are most in need.

All the activities are carried out with the consent of the local public administration and the health body. Volunteer associations, made up of both women alone and mixed men and women groups, have also participated in the project.

The workers from URBASER Jordan have received different awards and acknowledgements for this project in which, in total, in 2018 around 11 hotel trade companies took part and an average of 150-160 food packets were packaged on a daily basis, therefore preventing around 2,500 kg of food being thrown away, and over 4,500 individual food packets have been delivered to families most in need.



AULA ARTIGAS-ARRAIZ (Vizcaya, Spain)

The Aula Artigas-Arraiz is an environmental waste education centre that develops actions aimed at schools, organisations, associations and the public in general, to implant responsible consumption methods. With 8,521 visits in 21 months, in 2018 it became a reference point for awareness regarding waste management, dissemination of responsible consumption methods, knowledge of the environmental impact of generated waste and the promotion of a change in attitudes that help to reduce, reuse and recycle the waste that we generate in our homes.

Through its subsidiary ENVISER, URBASER has signed a partnership agreement with a further fourteen organisations that are committed to the goals of this centre.



PUBLIC NURSERY (Valladolid, Spain)

During 2017 and 2018, CETRANSA, a company belonging to URBASER worked alongside the Municipal Council of Santovenia de Pisuerga to generate a positive social impact in this town, where the company has been developing its business activities for many years, with shared value and respect being the guidelines for the relations with the community.

Through the contributions made by the company according to that stipulated in the partnership agreement signed by the two parties, the construction and operation of a public nursery has been enabled, which has allowed the schooling of 38 children from the district. Additionally, the company has participated in the concept "Santovenia City of Sport" which promotes sport and healthy practices amongst the town's youth, affecting a total of 723 people.



Local communities

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

About this Non-Financial Statement

URBASER

husiness model

management

Risks and opportunities

Ethics and corporate governance

SOCIAL COMMITMENT

NFIS 2018 | URBASER

As a company that is permanently in contact with society, URBASER has a strong commitment to its surrounding communities and environment. In that sense, its social commitment is centred mainly on two areas that it considers crucial to help society become fairer and more committed:

Communications and awareness actions for gender-based violence

URBASER is one of the largest companies that adhere to the initiative "Companies for a Society Free of Gender-based Violence", started by the Ministry of Health, Social Services, and Equality. Its main goal is to raise social awareness regarding equality and promote the insertion of victimised women into the labour market. As a participating company, URBASER has taken a firm stance in helping society become more aware of the problem, and in hiring women who have been victims of gender-based violence (GBV). This year, of all new job recruitments from members of vulnerable groups, 21% of them have been women who were victims of GBV.

In 2018, and with the support of Fundación Integra which specialises in helping victims of gender-based violence, an information session regarding gender-based violence was held for all workers in the head office. Likewise, in Elche (Alicante, Spain) a lecture was scheduled regarding

"Keys to Develop a Society free of Gender Based Violence". A flash mob was also recorded, organised by the staff, and rubber bracelets were sold to raise funds for a local organisation that helps victims of gender-based violence. Other cities, such as Chiclana de la Frontera (Cadiz, Spain), Villanueva de la Serena (Badajoz, Spain), and Denia (Alicante, Spain), also joined local campaigns for each of the local councils, helping spread the message against this great social disease.

For the second consecutive year, URBASER participated as a sponsor in the Race against Gender Violence in Madrid (Spain), and a large number of the company's workers also took part in this race.

Promotion of employment and labour market insertion for vulnerable communities and those at risk of social exclusion

In Spain URBASER is part of the sponsoring committee of Fundación Integra, which has been working since 2001 to help people who are at greater risk of social exclusion, as well as with people with disabilities, to insert themselves into the labour market. It is also part of the Company Network for the Incorpora Program of the "La Caixa Foundation Social Work", whose goal is to ensure the insertion into the labour market of people at risk of social exclusion. During 2018, URBASER hired 345 people who were at risk of social exclusion.

FUNDACIÓN EL SALVADOR RUGBY IN VALLADOLID (Spain)

Since 2015, every year Cetransa (a company belonging to URBASER) has collaborated financia-Ily and socially with the Fundación El Salvador Rugby in Valladolid (Spain).

The company's donations, amongst other things, sponsor the Integration Rugby team, training disabled people and socially marginalised groups. Last year, in addition to the training sessions, matches and tournaments with other clubs were organised, promoting the socialisation of these groups. URBASER once again backs all aspects of real integration.



URBASER JORDAN AND THE WOMEN'S ASSOCIATION OF AQABA

For just over a year URBASER has been providing services in the city of Agaba, in southern Jordan. Since it started the company has been highly involved in social commitment, working with the most underprivileged sectors on subiects such as discrimination and lack of resources in the family unit.

Women in this Arab country hold a disadvantaged position. For this reason, there are several women's associations in the country. In 2018, URBASER carried out some activities with the Women's Association of Agaba. Amongst other things, on the 21st of March (Mother's Day in Arab countries), workers from URBASER Jordan, went to one of the most underprivileged areas of Aqaba: Ashabeea Area, where they carried out some activities concerning environmental awareness, care of women and the fight against discrimination. Flowers were handed out to all the women who were in their houses in this district as a way to wish them well on their day and they painted walls together, with messages opposing discrimination against women and URBASER's support for the women of Agaba was exhibited.

communities

URBASER professional team

and safety

environmenta management

Innovation

Suppliers

About this Non-Financial

Statement

NFIS 2018 | URBASER

URBASER

business model

Strategic management

Risks and opportunities

Ethics and corporate governance

10 URBASER'S professional team

Human capital is one of the greatest priorities for URBASER. In this sense, the company promotes stable job conditions, decent and quality employment, it implements training programmes for its staff, and promotes safe and healthy work environments.

Human resource management within URBASER is geared towards achieving a highly qualified and motivated group, which identify with the Group's values, have their own initiative and a great customer service attitude that allows them to effectively and profitably manage any business opportunities that arise.



32,146

URBASER's workforce in 2018



26,722

Men

5,424 Women



11,030 Employees are members of trade unions



One of the company's most valuable non-tangible assets is the value provided by the professionals it employs around the world. Because of this, the company has taken a stand to provide steady and quality employment.

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Workforce on the 31st of December by country of work in 2018

SWEDEN 537	MOROCCO 444	FINLAND 2	94	BAHRAIN 1,244
UNITED KINGDOM 653	JORDAN 341	UNITED STATES 6	ARGENTINA 3,424	OMAN 704
ITALY 79	SPAIN 17,931	MEXICO 485	FRANCE 1,008	CHILE 4,996
				Total: 32,146

Average workforce in 2018*	
Gender	•
Women	5,370
Men	26,455
Age	
<35	7,727
36-50	13,856
>50	10.242
Professional c	ategory
Directors	142
Middle management	1,200
Technicians	1,259
Operators	20.224

Operators 29,224 85% of the workforce is covered by the collective agreements applicable to the companies, firms and joint ventures belonging to the company and they have been agreed upon with the legal representation of the each location's workers, always in accordance with the provisions of the fundamental agreements of the International Labour Organisation. Any organisational changes, including notifications, are agreed upon as part of these collective agreements and are performed as part of the current applicable legislation.

Percentage of workers covered by collective agreements in 2018

SWEDEN 100%	MOROCCO 89%
FINLAND 100%	ARGENTINA 89%
ITALY 99%	SPAIN 100%
MEXICO 69%	FRANCE 100%
	Total: 85%

Staff in the United Kingdom, Oman, Jordan, the United States and Bahrain are not covered by collective bargaining agreements.

communities

URBASER professional team

Health and safety

Sustainable environmenta management

Innovation

Suppliers

^{*} Due to a recategorization made on the internal employee registration system, implemented as of October, only the complete records of the employees of the last 3 months of 2018 have been obtained. For this reason, the average workforce has been calculated based on the data that comprise the months of October, November and December.

Age range

<35

36-50

>50

NFIS 2018 | URBASER

Human rights

About this Non-Financial Statement

One of the company's most valuable non-tangible assets is the value provided by the professionals it employs around the world. Because of this, the company has taken a stand to provide steady and quality employment.

Permanent contracts		Temporary contracts	
Women	Men	Women	Men
4,139	21,274	1,285	5,448

Permanent

contracts

5,195

11,237

8,981

Temporary

contracts

2,687

2,765

1,281

Part-time	workers	Full-time v	Full-time workers		
Women	Men	Women	Men		
1,526	1,259	3,897	25,464		

About URBASER

husiness model

Strategic management

Risks and opportunities

Ethics and

corporate governance

Professional Category Permanent Temporary contracts contracts 150 **Directors** Middle 32 702 management **Technicians** 1,119 152 Operators 23,442 6,548

In recent years, there has been an evolution in the employment characteristics within the sector: its improvement, technification and professionalisation thanks to progress in the quality of the employment regarding safety, health, training and pay. This has meant attracting a wider range of talent of all types regarding gender, professional profile, age, etc.



In 2018, the employee turnover rate was 14.47%.

Layoffs in 2018			
Women	Men		
224	1,661		

Layoffs in 2018		
Age range		
<35		864
36-50		632
>50		389

Layoffs in 2018		
Category		
Directors	3	
Middle management	30	
Technicians	70	
Operators	1,782	

Women	Men
5.17%	0.70%

Turnover rate* in 2018

SWEDEN	JORDAN	SPAIN	
31.66%	46.63%	7.65%	
UNITED KINGDOM	ITALY	CHILE	
23.89%	1.27%	32.19%	
OMAN	FRANCE	BAHREIN	
13.92%	6.55%	16.24%	
MEXICO	FINLAND	ARGENTINA	
74.43%	62.59%	7.97%	
MOROCCO	UNITED STATES	-	
0.68%	0.00%		

*Employee turnover rates are calculated by dividing the number of employees who voluntarily left the company, by the total number of employees.

ABSENTEEISM

The activities developed by URBASER are very labour-intensive. This is why absenteeism is a major concern for the company. We understand absenteeism as a worker's abscence from their workstation during hours that correspond to working hours within the legal working hours limits.

In order to combat this problem, all middle management staff have access to training regarding management of absenteeism, as well as different information analysis tools to measure and control it.

Total: 14.47%



Total number of hours of absenteeism in URBASER in 2018: 3,658,474.

Local communities

> URBASER team

Health and safety

Sustainable environmenta management

Innovation

Suppliers

Ethics and corporate governance

COMMITMENT TO DIVERSITY AND EQUAL OPPORTUNITIES

URBASER's goal is to become a reference inside and outside its field, by achieving thorough diversity within its workforce and policies, as described by its **Equality and Diversity Policies**. In order to achieve this, it is currently working to promote equal opportunities for all its team members. In this sense, URBASER is acting upon the commitments listed in its Equality Plan, and in the other countries it has started to implant safety measures.

The process to identify any risks derived from its **Equality Plan** includes a diagnosis of the company and an indepth analysis of any human resource policies or practices performed by the company's Equality Officer. Among other things, an ongoing problem in Spain is related to activities subjected to "labour subrogation", which perpetuate existing employee compositions (mainly male), and make it harder to hire female employees.

URBASER is working on a daily basis to create a corporate culture where gender perspectives are applied through both formal and informal procedures. In a **traditionally male-dominated sector**, the company is trying to normalise a greater presence of women. As part of these efforts, the support of labour representatives is a key aspect when it comes to establishing goals and joint commitments that are reflected in equality plans.

* The Equality Plans apply to societies URBASER S.A.U., Socamex S.A., Sertego S.A.U., Enviser S.A, Sirsa SAU.



Total average salaries*			
Category	Women	Men	Ratio
Management Board	No women	€217,101.19	N/A
Directors	Not applicable***	€403,924.70	N/A
Management Team	€96,855.66	€126,864.51	0.76
Middle Management	€37,279.06	€52,531.55	0.71
Technicians	€28,632.90	€36,495.96	0.83
Operators	€17,437.10	€19,047.89	0.92

* Includes fixed and variable salary. This is the first year in which such information regarding salaries is being reported, therefore it establishes the basis on which to begin reporting changes to this figure in the future. *** This data has not been reported in order to comply with the Personal Data Protection Law, since there is only one woman in this category.

Total average salaries**			
Age range	Women	Men	Ratio
<35	€18,263.98	€15,918.57	1.15
36-50	€22,201.75	€23,148.43	0.96
>50	€19,899.45	€23,677.89	0.84

**The data reported included 89% of the overall workforce, due to the fact that the current reporting systems do not contain the "age" variable included in all the countries. This situation will be addressed for future reports.

URBASER S.A. is a signatory party to the **Diversity Charter**, and therefore has publicly affirmed its commitment to the following basic principles of equality and non-discrimination:

- Raising awareness regarding the principles of equality of opportunity and respecting diversity through the company's values and disseminating them among its employees.
- Promoting a more diverse team of employees and the integration of people with different profiles (regardless of their gender, sexual orientation, race, nationality, ethnic background, religion, beliefs, age, disability, etc.)
- Promoting inclusion and preventing any type of workplace discrimination (direct or indirect).
- Considering diversity throughout all its human management practices: diversity management must be an intersectional topic and become a pillar of all decisions taken in this regard.
- Promoting a more reasonable work-life balance.
- Recognising its client's diversity and acknowledging it as a source of innovation and development.
- Disseminating its commitment and participation in the Diversity Charter among all its employees, supplying companies, administrations, organisations, unions, and other social agents
- Supporting any activities whose aim is to promote non-discrimination, and reflect any results obtained progressively from its diversity policies in the company's annual report.

In addition, URBASER S.A. has adhered to the "More women, better companies" initiative started by the Ministry of Health, Social Services and Equality. Therefore, it is committed to promoting equality at the highest corporate levels, increasing the presence of women in its top positions. This initiative covers different actions and projects in which URBASER actively takes part.

As part of this initiative, the participation of many of the company's departments in the Female Executive Development Programme "Talentía 360°" ought to be highlighted. This was organised by the Spanish Women and Equal Opportunity Institute, and the Industrial Organisation School.

Furthermore, during the academic year 2017-2018, one of URBASER's Spanish directors participated in the "Promociona Program", organised by the Spanish Institute of Women and the CEOE (Spanish Federation of Corporate Organisations). This programme was specifically oriented towards developing professional and leadership skills among highly qualified women who are rising through the ranks of the organisation, and URBASER's Chief Executive Officer took part as one of the programme's mentors.

At URBASER, diversity is understood as a concept that goes beyond gender equality. The company's workforce includes people from diverse cultural backgrounds and different generations, which provide each team with different perspectives and favours the development of enriching ideas and solutions. In the current expansion cycle that the company is undergoing, the value provided by these ideas is invaluable.

communities

URBASER professional team

Health and safety

Sustainable environmenta management

Innovation

Suppliers

5

NFIS 2018 | URBASER

rights

About this Non-Financial Statement

About URBASER

Our business model

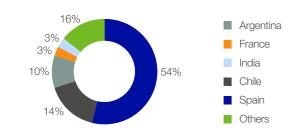
Strategic management

Risks and opportunities

Ethics and corporate governance

Workforce by country of origin

in percentages (%)



At URBASER, each person is valued because of their **skills** and experience, with the direct aim of avoiding any discriminatory biases that are often unconsciously applied during hiring processes. This is why the company participates in the Anonymous Resume Project organised by the Ministry through the Institute of Women (Spain).



Aware of the importance of sensitivity and training demanded by this topic, and with the goal of promoting a culture of equality across the entire organisation, the company supports a series of actions and good practices aimed at promoting and developing equal opportunities. The Equality and Social Commitment Department is in charge of these initiatives and works towards the insertion of people with disabilities or at risk of social exclusion in the labour market. During 2018, URBASER hired 172 people with disabilities, which add to an existing group of 455 team members with a disability and has managed to hire 345 people at high risk of social exclusion.

URBASER wants to safeguard job creation for people with disabilities. In 2010, it created a Special Work Centre, "URBACET S.L.", a non-profit organisation that helps people with disabilities insert themselves into the labour market



"Boarding Cards for Equality", initiative framed within the commitment policy for Equality of the entire URBASER Group

and provides gardening, urban maintenance, and cleaning services at beaches, parks, and public squares.

Because of the nature of the company's economic activities, accessibility for people with disabilities is not something the company can greatly influence, as most jobs are performed standing up, and on the streets of different cities around the world. However, accessibility for people with disabilities is one of the criteria considered when designing corporate offices.

As part of its efforts to achieve real integration, URBASER S.A. is one of the sponsors of the Integra Foundation in Spain, which has been working since 2011 to help people at risk of social exclusion and those with disabilities insert themselves into the labour market. The company believes that collaboration and constant interactions with organisations can be a driver for change. Because of this, URBASER S.A. is part of the "Incorpora Programme Company Network", the Social Work initiative started by the La Caixa Foundation in Spain, and the "Recycling for Changed Lives" programme organised by Ecoembes and La Caixa. These projects have the goal of integrating people at risk of social exclusion into the labour market.

The URBASER S.A. Harassment Protocol is centred around three key objectives: adopting the necessary measures to prevent any harassment situation from developing, helping employees identify any ongoing moral, sexual, or gender based harassment situations or discriminatory acts, and establishing a series of acting guidelines that allow the company to investigate, and if necessary, to punish any possibly harassment situations.





communities

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

NFIS 2018 | URBASER

About this Non-Financial Statement

About

URBASER

business

model

Strategic

management

Risks and

opportunities

Ethics and corporate governance On an operational level, and with the goal of guaranteeing confidentiality in all cases, URBASER has the position of "instructor" that employees or their legal representatives may approach to report any possible harassment cases they may have detected.

The Harassment Prevention Committee, which is made up of an equal amount of company employees and union representatives, has the goal of providing unbiased assessments on the facts and data provided in the instructor's report, deciding on whether there is a case of harassment, and if necessary, to propose correctional and disciplinary measures.

WORK-LIFE BALANCE

URBASER has adopted a series of measures aimed at promoting an adequate work-life balance, and to allow the company's employees to manage their personal, family and work obligations appropriately. However, it has not documented these measures in writing.

At the company's headquarters, for example, some of the highly regarded measures applied include: flexible working hours, intensive schedules on Fridays and during summer months.

Up to 85% of the workforce has the right to different conciliation measures, as part of the different collective agreements negotiated with each centre. Many of these agreements include, for example, conditions for improved leave and time off, reduced work schedules, shift scheduling flexibility, personal days, or days off that are uncompensated or additional vis-à-vis the minimum legal requirements.

DEVELOPMENT OF THE PROFESSIONAL TEAM

For URBASER's workforce, training and professional development is a key aspect of its improvements, motivation, efficiency, and the quality of services provided. The company aims to develop its team member's professional competencies in order to adapt them to its constant expansion and competitiveness needs. At the same time, the company tries to update and adapt its resources to the current technological evolution.

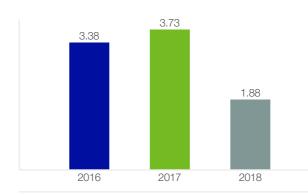
Through the Bi-annual Training Plan, the training needs for Spanish-based staff are identified and ranked in the order in which they are to be addressed throughout the year. In the other countries where URBASER operates, training plans are developed individually.

URBASER has a firm commitment towards the professional development of the people that make up the organisation, and it tries to introduce a culture of continuous learning into its day-to-day operations in order to achieve a better and more open attitude towards innovation. During 2018, over 234,874 hours of training were provided to over 18,751 employees thanks to an investment of over 1,878,028 euros made by the company.



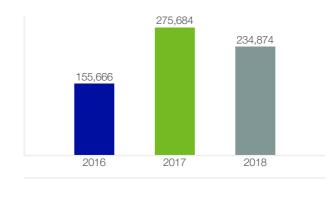
Investment in training

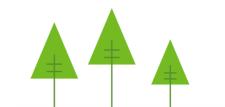
in millions of Euros (M€)



Training received

in hours (h)





Training received by profeesional categories in hours (h)			
Directors 5,555.0			
Middle management	29,755.5		
Technicians	28,424.3		
Operators	171,139.0		

>>,0



communities URBASER professional

and safety

team

Sustainable environmenta management

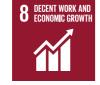
Innovation

Ethics and corporate governance



11 Health and safety

For URBASER, guaranteeing a safe and healthy work environment is fundamental. The company devotes preventative efforts as well as intensive training in order to ensure this ob-



jective. To demonstrate this commitment, the company has developed a Quality, Health, Safety and Environment Corporate Policy.

The company is committed to implementing the OHSAS 18001 Standard across all its main activities and guarantees that its requirements are met at all the work sites that have been awarded this certification.

2021 Goal: To quarantee the transition of all the centres and companies certified by the OHSAS 18001 Standard to the new ISO 45001 standard, which is the first international regulation that determines the basic requirements for implementing a Health and Safety System at work.

Level reached in 2018: During 2018, the documentation of four of URBASER's management systems and some tools used in these and other systems were studied, and the structure of the new Corporate System was designed, which will start development in 2019. In addition, a large number of technicians from the Spanish joint prevention service have taken courses on the ISO 45001 standard on Health and Safety Management Systems at Work, on both implantation and auditing, to make the implantation of this standard easier once the system has been adapted.

SAFETY AS A GUIDING PRINCIPLE

As part of its commitment to occupational safety, URBASER pays particular attention to any operations where its employees are exposed to serious safety risks. These circumstances are managed by issuing special work permits granted to the workers that perform their tasks in these areas, which entail specific advanced training regarding safety procedures; medical examinations and clearance is likewise a key part of this process. Close monitoring in these situations is of particular importance, so these tasks are usually assigned to supervisor-level and specially qualified staff. These supervisors must be present whenever such tasks are performed. These measures ensure operations are carried out under the strictest safety standards.

In 2018 over 900 specific risk evaluations of different installations according to the plans were carried out as preventive actions. These took place in the areas of ergonomics, psycho-social risks, chemical agents, heat stress, lighting, noise, vibrations, biological agents, etc.

Accident indicators	2016	2017	2018
Incidence rate ¹	80.2	85.5	92.3
Frequency rate ²	46.6	43.1	45.3
Severity rate ³	1.8	1.1	1.6

^{1.} Incidence rate (No. of accidents that caused time off/No. of workers)*1,000

ACCIDENT RECORDING AND REPORTING

The system used to record and report workplace accidents uses an Internal Procedure to investigate the accident or incident, or any related occupation illnesses. This is a key part of our Health and Safety Management System, which establishes the actions that must be carried out, the persons in charge of them, and the information that must be provided in case of a workplace accident. In this sense, each accident or occupational illness requires reports to be drafted, which collect general information, analyse the circumstances that lead to it, and include potential preventative or corrective measures that will avoid their recurrence. This system is applied across Spain.

During 2018, there have been a total of 2,966 accidents, seven fatal accidents (three caused by heart attacks, two due to a traffic accident, one on a rescue mission and one due to the falling of a bracket) and 9 cases of confirmed occupational illnesses. For all the fatal accidents, an internal memorandum was sent to the company's Board of Directors, and all information and documentation regarding the incident was gathered. Next, an inquiry was opened to determine all circumstances of the accident, and to establish any preventative and/or corrective measures.

No specific activities that carry a higher risk of accident or occupational health hazard have been identified.



2019 Goal: The implementation of the accident recording and reporting system on a global scale.

communities

URBASER professiona team

Health and safety

Sustainable environmenta management

Innovation

Suppliers

^{2.} Frequency rate (No. of accidents that caused time off/No. of hours worked)* 1,000,000

^{3.} Severity rate (No. work days lost / No. of hours worked) *1,000

Human rights

communities

URBASER

professional

team

Health

and safety

Sustainable

environmental

management

Innovation

About this Non-Financial Statement

About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and corporate governance

HEALTHY COMPANY

NFIS 2018 | URBASER

URBASER aims to be a healthy company and promotes a safe working environment as well as healthy lifestyle habits among its employees. In order to achieve this, it has designed a plan based on four basic pillars: a safe working environment, psychosocial health, medical monitoring, and social intervention. In this regard, extensive health evaluations and screening have been performed. At the same time, different interventions have been carried out to promote healthy lifestyle and physical activity, such as organising charity races, including healthy meals at sites where food is sold and work canteens, providing parking spaces for bikes, campaigns to promote fruit consumption and the use of stairs, among other things.

COLLECTIVE BARGAINING AGREEMENTS REGARDING HEALTH AND SAFETY

Throughout the different collective bargaining initiatives completed during 2018, the company maintained a firm commitment to contribute with the utmost efficiency for the prevention of workplace hazards and to reduce the incident of workplace accidents. In that sense, agreements were reached to strengthen the role of social communication with regards to occupational health and safety. Any references made within these agreements regarding the need for information, consultation and participation were stressed. Training was upheld as the most adequate tool to promote a prevention-based corporate culture and widespread changes in attitude. The preventative implications of these different acknowledgements must favour

the prevention of occupational illnesses (or any other that may be affected by the work performed) and specific measures must be applied to each post in order to help prevent such illnesses.

Furthermore, supplements, assistance or indemnities are established that have their origin in benefits or situations arising from work accidents and/or work related diseases. There have been improvements in work-life balance and references for protection in cases of pregnancy and breast-feeding have been made too.



PUBLIC HEALTH

As a company that treats drinking water, we have a clear commitment to meeting the **legal requirements** regarding the health criteria of the quality of the water for human consumption, the specifications of the analysis methods, along with the development and the marketing of water.

All the drinking water supply centres have a **Self-Control** and **Supply Management Programme** that includes the description of the supply infrastructure, maintenance programme and analysis programme (frequency, sampling points, trial parameters, etc.), among other programmes. For example, the determination of the Legionella, a parameter that depends on the characteristics and properties of the water and on the environmental temperature and on the water itself, must be analysed in certain places where required by Health Inspections; this is included in the aforementioned Self-Control and Supply Management Programme.



As part of the activities organised for Global Safety Day, which was celebrated in May 2018 by APM Terminals, one of URBASER's major clients and a major worldwide player in the port and shipping terminal operator market, URBASER received the "Silver Helmet" award for the standards kept at the Algeciras Port, which recognised it as its Safest Contract after reducing the incidence of workplace accidents by almost 50%. This acknowledges the way best practices have been implemented in the field of health and safety.





57.6% Employees are covered by OHSAS 18001



166
Internal audits and 97
external audits carried
out regarding health
and safety



4.5
Million euros invested in health and safety training



20,257
Workers formally represented on health and safety committees



98,124

Hours of health and safety training provided

Suppliers

64

NFIS 2018 | URBASER

About this Non-Financial Statement

About URBASER

business

managemen

Risks and opportunities

Ethics and corporate governance



12 Sustainable environmental management

URBASER merges sustainability and innovation in all its processes, with the aim of controlling the consumption of natural resources, minimising the generation of waste and pollution, and reducing its carbon footprint.

URBASER applies a Quality, Health, Safety and Environment Corporate Policy across the board, with the express purpose of ensuring the highest possible quality in all services rendered. This guarantees the client's satisfaction through exemplary environmental behaviours and strict control of all workplace risks.

At URBASER, we protect the environment by preventing pollution, respecting natural resources, and applying innovative waste transformation technologies and solutions.

MANAGEMENT SYSTEMS

The Integrated System for Quality, Health, Safety and Environmental Management, in accordance to the regulations provided by ISO 9001:2015, ISO 14001:2015, OHSAS 18001:2007 standards, and under the purview of external independent auditing, ensures the application of said policies, the continuous compliance with established targets and the principle of constant improvement.

On any work sites where the company aims to implement the Environmental Management System, a thorough environmental diagnosis of the facility is first performed. This looks at legal compliance, checking for any pending per-



63.1% Sales covered by ISO14001 certification or other environmental standard

in the organisational strategy.

mit and ensuring that it has been obtained. It also identi

fies legal requirements and ensures the identification and assessment of any environmental aspects aimed at establishing operational controls over those of significance.

Periodically, compliance with environmental legislation is also evaluated, and any new legal requirements that may

The company also keeps an Energy Management Sys-

tem that follows ISO 50001 regulations, which helps it

improve its energy performance, improve its efficiency,

and reduce the environmental impact of its activities.

This system enables the energy usage monitoring to be

used as a permanent component of the company's acti-

vities and strategies and is therefore a fundamental tool

The company also performs internal audits across its

different services and facilities in order to verify that these

management systems are being followed and therefore

minimise any possible impact or risk to quality, health,

safety and the environment. Likewise, URBASER has

defined the responsibilities and tasks assigned to each

company member regarding the health, safety, environ-

mental and energy usage objectives being met.

arise from new legal standards are also assessed.



Internally audited **Environmental complaints** were received and correctly regarding environmental addressed protection



199

Audited regarding eneray efficiency during 2018



126 Centres externally audited regarding environmental protection

URBASER professiona team

communities

and safety

Sustainable

Innovation

*Except for countries sanctioned by the OFAC (U.S. Office of Foreign Assets Control).

PROVISIONS AND INSURANCE AGAINST **ENVIRONMENTAL RISKS**

URBASER is currently listed as a holder and insured party in an international insurance programme, which is structured in two layers that allow it to cover its possible environmental responsibility. This insurance programme is covered under Law 11/2014 (26/2007), the European Union's Directive 2004/35/CE on environmental responsibility, and/or any other applicable laws in the jurisdiction where the policy applies.

Geographically, this policy extends and is limited to the responsibilities that may be derived from bodily harm, material damage, emissions, nuisance or obstructions, environmental damage, or any other harm done as a consequence of these, and/or pure harm occurred in all countries around the globe*.

NFIS 2018 | URBASER

rights

About this Non-Financial Statement

About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and corporate governance

The Programme covers any activity performed by URBASER according to its Annual Report and/or the corporate objective (articles of association) of its Companies, as well as any supplementary information provided by same, and any new activities that are incorporated later on. These activities are performed within the scope of comprehensive waste management (collection, treatment, regeneration and/or elimination of urban waste, domestic waste, industrial waste, treatment and elimination, plant management, etc.), the promotion and operations of any type of services (building cleaning and repairs, comprehensive facility and real estate management, urban facilities, water cycle management, design, conservation and maintenance for public gardens and parks, preservation of natural resources, etc.) among many other services.

The compensation limits that can be provided by each one of the policy's two layers are established at €40,000,000 and €20,000,000 (if over €40,000,000) respectively.

The environmental provisions of URBASER, as of 31st December 2018, was 25.6 million euros.

ENERGY CONSUMPTION AND CARBON FOOTPRINT

As part of its daily efforts to provide a positive contribution to the environment, and to manage waste efficiently, URBASER is working to maximise the different available **sources of renewable energy** and to obtain materials that can be recycled.

This is already established by the European Waste Framework Directive, which places the harnessing of energy from waste in



fourth place, immediately after waste prevention, re-utilisation, and material value.

Energy management

In this way, the waste treated by URBASER is being transformed into the following energy sources:

Biogas: This is produced spontaneously in landfills and derived from processes such a biomethanisation or anaerobic digestion of organic matter.

Energy recovery from waste: These processes allow us to recover energy from any non-recyclable materials.

Biomasa: Heat is generated from biomass waste.

The different energy recovery processes available allow URBASER to **generate electricity**, both for self-consumption and for export.

Most of the energy generated by URBASER during its activities is electrical energy, which is then used to treat waste and water, as well as fossil fuels used to power the company's fleet. The different energy harnessing processes used (biogas, energy recovery, and biomass) allow

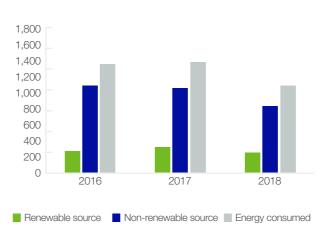
URBASER to generate electricity during its processes. Of the generated energy, 18% was used for self-consumption and the remaining 82% was exported.

During 2018, the company managed to reduce 41.39 MWh from its energy consumption thanks to **efficient energy management**, which has consisted of the progressive elimination of standard lights for LED technology, and the installation of regulation systems (movement sensors and photocells) and flow control, as well as the installation of heat insulation at critical points of its facilities.

Energy consumed	
Gigawatts hour (GWh)	2018
Direct consumption	1,287.84
Indirect consumption	240.35

Energy consumption

Gigawatts hour (GWh)



Starting in 2016 URBASER has had an **Energy Policy** which covers the energy and operational efficiency across all services and products offered to the company's clients. One of the most relevant aspects included in this policy is the inclusion of supporting companies and suppliers in the understanding and acceptance standards.

Emissions and carbon footprint

Waste management procedures go beyond those applied at waste management plants. The waste collection fleet and supporting machinery also produce GHG* emissions.

The European Waste Framework Directive establishes as one of its priorities the **recovery of materials**. However, even before this, it highlights the importance of reducing waste generation and its disposal in landfills. This is a key objective, as waste and residual water management represents 5% of the world's GHG emissions. Its main cause is, precisely, leaks that occur in landfills. Depositing waste in landfills is an unavoidable source of GHG.

Improving urban waste collection services is one of the main challenges faced by cities, especially where population is growing. The vehicle fleet also represents one of the main sources of GHG emissions. For this reason, they are subjected to thorough preventative maintenance, and telemetry technology is used to optimise their routes and promote efficient driving practices. Nowadays, URBASER has 737 low-emission vehicles in its fleet, as well as 434 zero-emission vehicles.

communities

URBASER professional team

Health and safety

Sustainable environmenta management

Innovation

Suppliers

Suppliers

^{*}Greenhouse gases.

CARBON FOOTPRINT

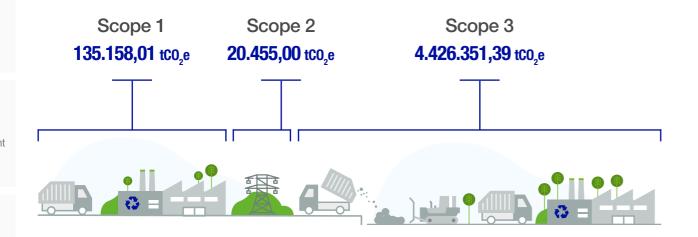
NFIS 2018 | URBASER

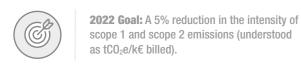
Reducing emissions and energy efficiency contribute to one of the company's main environmental goals.

URBASER is working on new initiatives that favour conservation and efficiency, aimed at progressively reducing emissions on a yearly basis. Thanks to these measures, the company has reduced its energy intensity by 7% compared to 2016, and by 2018 it had turned over a total of 0.825 Gwh/million EUR in revenue.

Renewable energy production, recovering combustible materials and value recovery from compost have jointly achieved the **prevention of 1,481,280.16** tCO₂e of emissions during 2018. This represents an increase of 18% versus the emissions prevented during 2016. In addition, thanks to the use of electricity from grids with Renewable Origin certificates, we have managed to reduce our emissions by 46.359,01 tCO₂.

URBASER's global carbon footprint 2018 (scopes 1, 2 and 3)







"REDUZCO" QUALITY SEAL

During 2018, URBASER obtained for the first time in Spain, the "Reduzco" quality seal, which is awarded by the Spanish Climate Change Office, which acknowledged the policies applied and the results obtained by the company over the past 4 years (2013-2016), with the express purpose of reducing its carbon footprint. After 4 years reporting its carbon footprint and its Emission Reduction Plan, the "Reduzco" quality seal recognises the commitment and effort undertaken by URBASER in its efforts to fight climate change. URBASER's carbon footprint in Spain has been externally verified since 2013, in accordance with the UNE-EN ISO 14064 regulation.





Other significant emissions in Tonnes (t)			
	2016	2017	2018
NO _x	913	1,268.07	1,581.11
SO _x	220	246.57	306.82
Particles	54	63.43	82.84
Others gases	1,440	1,320.17	1,456.22

"CLIMA" PROJECTS

Clima Projects are a Spanish initiative designed to reduce GHG emissions, promoted by the Carbon Fund for a Sustainable Economy (FES-CO₂). The purpose of these plans is to create a pathway that will transform the Spanish productive sector under a low carbon model.

URBASER S.A.U. presented 6 different projects (based in Caudete, Elche, Palencia, Zaragoza, Madrid, and Lanzarote) to the 2017 *Clima* Projects Bidding process. An additional project was submitted to the 2018 bidding process (Marchena). All projects submitted were granted approval. Additionally, in 2016 *RESURJA* also took part as an executor for two spearheaded projects (Linares and Jaen).

At the end of the 2018 period, URBASER S.A.U. aims to deliver 47,195 tCO₂e of verified prevented emissions to the FES-CO₂, corresponding to the landfills in Zaragoza, Madrid, Lanzarote, Linares and Jaen.

For URBASER, the *Clima* Projects awarded by the Ministry for Ecological Transition confirm its commitment to the different initiatives aligned to sustainability and the reduction of its carbon footprint.

Local communities

URBASER professional team

Health and safety

Sustainable environmenta management

Innovation

Suppliers

NFIS 2018 | URBASER

NOISE AND LIGHT POLLUTION

At URBASER, we have a readily available Environmental Management System at our disposal, certified under UNE-EN ISO 140001 standards, with which we guarantee that the levels of the legis-lation in force regarding noise and light pollution are not exceeded, which helps prevent and improve the environmental impact, risks, and opportunity management strategies used by the company.

As part of the documentation included in this Environmental Management System, the company has included a procedure to perform noise pollution assessments during any activity that carries a risk of producing noise pollution. The need for noise pollution control mechanisms will be determined according to the local regulations on each location.

Owing to the nature of some of our activities, which require Integrated Environmental Authori-sations, the minimum distances to be kept from population centres to prevent any type of noise or light pollution are established in the procedures themselves. The company meets these legal requirements, set both by the State and those laid down by Autonomous Community laws and byelaws for the regions in which we operate.

While performing any activities that may be considered as carrying a high risk of noise pollution, or those where its licensing or permit requirements demand it, noise level assessments will be performed in such a way that they are representative of the facility's standard operations, and during the hours in which the facility is functioning.

Operational **controls on mobile machinery** will be performed on well-maintained engine, transmission, bodywork, and any other elements that may produce noise.

WATER CONSUMPTION IN OUR ACTIVITIES

Because of the nature of its economic activities, the work performed by URBASER is not considered to be of particularly high resource consumption, with the notable exception of water usage. Nevertheless, **controls and measurements for the consumption of all resources** are routinely performed, in order to optimise their efficiency as much as possible.

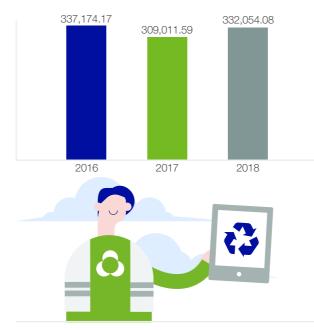
As part of the existing framework that regulates the use of natural resources, the company has set a series of general and binding guidelines aimed at **preventing the unnecessary consumption of water**. These guidelines include individual regulations for employee's conduct, such as manually checking that all pipes and taps are closed when not in use, the installation of monitoring and limiting devices that control water flow, other water saving systems installed on all facilities, and the harnessing of rainwater.



Total water consumption Cubic meters (m³) 2016 2017 2018 Total water consumption 6,277,557.2 6,348,839.02 5,579,486.61 Ground or well water 1,495,020.60 1,210,031.91 1,056,304.91 Water from public grid 4,555,944.00 4,444,723.67 3,764,704.91 Rainwater 226.592.60 178.608.60 176.104.24 Waste disposal water 1,313,762.72 1,325,396.72 1,213,579.2 Waste water generated during normal operations 551,582.55 649,816.59 501,097.48 Water contained inside eliminated waste 762,180.16 675,580.13 712,481.76

Reused water

cubic meters (m³)



RAW MATERIAL CONSUMPTION

At URBASER we are firmly committed to using energy and raw materials efficiently. The **rational use of resources** and the continuous search for maximum efficiency by using the most advanced available technologies are part of the basic principles that guide our efforts to reduce our impact on material resources, land and the ecosystem.

	2018	Units
Potash	3,328.95	Tonnes
Wire	1,657.89	Tonnes
Lubricants	1,764.60	Tonnes
Tyres	1,247.87	Tonnes
Bin bags	32.72	Millions

communities

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

NFIS 2018 | URBASER

communities

URBASER

professional

team

About this Non-Financial Statement

URBASER

Our business model

management

Risks and opportunities

Ethics and corporate governance

WASTE GENERATED

As any other industrial enterprise, the activities performed by URBASER generate some degree of waste. This includes the waste generated by machinery or facility maintenance, such as used oils, batteries, contaminated rags, contaminated containers, etc.

The company guarantees the appropriate management and treatment of all the waste it generates during its activities, whether hazardous or inert. Collection is always performed through an authorised agent, previously selected by the company itself.

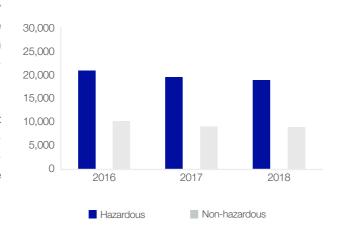
In 2018, the company generated 21,517.18 tonnes of hazardous waste and 10.246.96 tonnes of non-hazardous waste. Both were derived from the company's own industrial activities. At URBASER, we have managed to recover 82% of the hazardous waste that we have generated.

Covering the company's activity, there is a leakage control, which pays particular attention to the control of leachates from the waste being managed, as well as the leakage of volatile compounds that could occur in the facilities.

URBASER tries to minimise the amount of waste generated during its treatment and management processes. We prioritise re-using, recycling and energy recovery when managing our own waste. When this is not possible, and as a last resort, we eliminate it.

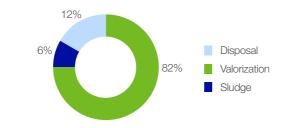
Waste generated by our activity

in tonnes (t)



Hazardous waste generated by our activity by type of management

in percentage(%)



MEASURES TO PROTECT AND RESTORE BIODIVERSITY IN PROTECTED AREAS

For URBASER, preserving biodiversity and using natural resources responsibly are a necessary condition to achieving sustainability, in addition to an ethical commitment. The company believes that valuing and preserving biodiversity is a necessary medium for economic development and social progress.

URBASER strives to identify and evaluate its possible effects on biodiversity throughout the design, construction, operation, maintenance and dismantling stages of its operations. In order to carry out appropriate management, control and monitoring practices on these procedures, it has established several environmental surveillance plans aimed at controlling and implementing any preventative measures associated with the project.

Water bodies significantly affected by collection or discharge

Water needs to be collected and discharged for the development of certain activities of URBASER: I) treatment of waste in plants; II) supply of drinking water through Drinking Water Treatment Centres, in Waste Water Treatment Plants (WWTP), and Sea Water Desalination Facilities; III) performance of work. Therefore, the company and the environmental administration establish prevention steps to minimise any possible affects to the species that may be found in the marine ecosystems, such as respect for the environmental flow regime and the technical requirements established by the administration.

URBASER provides its services in 17 protected spaces, which involves special protection measures regarding emissions, spillages, dumping, etc. The services provided are of all types, from selective collection, to the cleaning of beaches, to the performance of small building work within the water treatment area. In all cases, the special environmental protection controls (air, water, soil. species, etc.) established in the technical specifications for said services are respected, as well as the legislation applicable to these spaces.



Sustainable

Innovation

Suppliers

74

Letter from the CEO

NFIS 2018 | URBASER

About this Non-Financial Statement

About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and corporate governance



13 Innovation

URBASER is investing in a clear **innovative vision and policy**, where research, development and technological innovations (R&D+i) are considered strategic values that will be fundamental in facing future challenges.

URBASER's vision for R&D+i is to become a point of reference in the environmental sector for its R&D+i initiatives, for providing innovative solutions for the sustainable development of urban services, integrated water management, and the treatment of municipal and industrial waste.

To implement this vision, a **Strategic Innovation Plan** which covers all main lines of research related to circular economies, smart cities, and the culture of innovation, is periodically developed in Spain.

During 2018, the company finalised its Strategic Innovation Plan for the years 2015-2018 with satisfactory results. The company has already begun drafting a new Strategic Innovation Plan for the period 2019-2023.

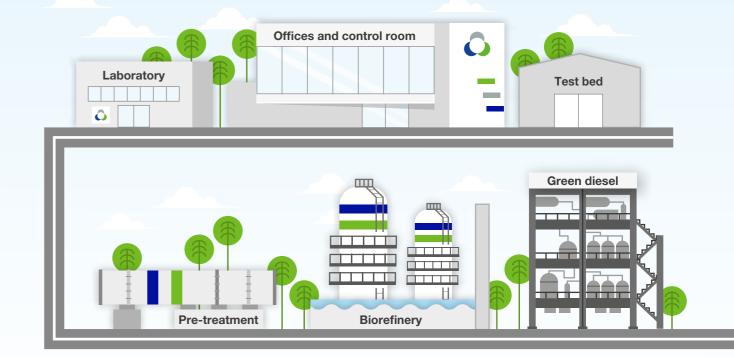
URBASER's growing commitment to innovation has allowed it to improve its R&D+i management progressively and sustainably for over a decade, as well as to manage the resources appropriately devoted to same.

Within Spain, URBASER manages its R&D+i division through a certified system designed in accordance to the guidelines established by UNE directive 166002:2014, and the recommendations provided by the European Standards Committee UNE-CEN/TS 16555-1:2013 on Innovation Management - Part 1: Innovation Management Systems.

CIAM Technological Innovation Centre for Waste Treatment "Alfonso Maíllo"

An international reference centre that fosters public-private collaboration for carrying out national and international **R&D+i** projects.

These facilities are an opportunity to advance in the development of circular economy projects in the field of waste management.

















Laboratory

8 Full-time workers

2 European Projects 6 National Projects

Professorship

4 Public partners

10 Private

INNOVATION CULTURE

NFIS 2018 | URBASER

The innovation model followed by URBASER seeks to **create** added value through all its R&D+i operations. In order to accomplish this, it systematically promotes the involvement of all members of the company, as well as its clients and suppliers, in the management and development of research projects.

Designing and carrying out innovation projects **promotes creativity** within the company and improves its member's ability to abandon structured paths and tested mind sets, it also enables it to generate ideas or hypotheses that provide new solutions for specific problems.



2018 Goal: The search for new uses for biogas by way of employing cleaning technologies.

Implementation status: During 2018 R&D projects have been carried out for new biogas uses, produced in anaerobic digestion, with desulphurisation products and techniques. Research is also being carried out to obtain new chemical substances with added value from biogas.



2019 Goal: Approval and start-up of the new Innovation Strategic Plan for the 2019-2023 period which will bring about new strategic lines and goals.

Finally, it should be pointed out that URBASER has implemented a **technology and knowledge management system** that allows it to recruit, analyse, disseminate and exploit internal and external quality information to improve the company's standing ground within the markets where it operates.

INNOVATION

During 2018, two workshops on innovation were held at the Company's Headquarters. Their main goal was to draft preliminary plans for innovation projects that could be carried out under the new Strategic Innovation Plan.

During these workshops, methods such as Design Thinking and Creative Problem Solving were used. They facilitated the process of formulating problems that responded to the current needs of the company and its treatment centres, as well as on detecting possible innovative solutions. 24 technicians from different regions and divisions participated in these workshops.

3R2020 PROJECT

Shows the technical and economic viability of obtaining Green Diesel from plastic waste:

The general purpose of this project is to develop innovative technologies that allow us to recover and recycle specific waste sources that are not currently being recovered and transform them into useful and economically viable resources.

IWATER 2018 AWARD

In November, 2018, the Barcelona Integral Water Cycle International Trade Fair, "Iwater", awarded the prize for best research to SOCAMEX for the R&D+i project "Smart Plant", which proposes testing eco-innovative and energy-efficient solutions in real settings in order to renew the waste water treatment plants. It also seeks to close the circular chain of value through the application of low carbon techniques for the recovery of materials which would otherwise be lost. The final aim of the project is to generate a catalogue of new products including biopolymers, cellulose, fertilisers and intermediate compounds, which will be recovered in these plants and processed until reaching the end product.

INNOVIARIA PROJECT

This project covers improvements on the varied urban cleaning and waste collection services, as well as the design of its facilities, equipment and street furnature required to provide these services. The project seeks to diminish the environmental and acoustic impact and to improve the efficiency of the services provided.

LIFE GREEN SEWER PROJECT

The LIFE GREEN SEWER project, co-funded by the European Commission in the LIFE Programme, is aimed at the implementation of a new secondary treatment system of waste waters and industrial sewage, by way of the innovative integration of direct-inverse osmosis technologies with an anaerobic membrane bio-reactor.

This new system will allow the recovery of resources, in line with the European Commission's Circular Economy Strategic Plan, obtaining biogas, nutrients and water for reuse.

The monitoring of discharges will also be carried out, as required by local legislation in each case, as well as decreasing discharges of emerging pollutants and pathogens, the reduction in energy consumption and in water losses and the decrease in the operating costs of the secondary treatment of waste water.

The project will be carried out by a consortium of five partners over a period of thirty-six months, it started in September 2018. URBASER is represented in this consortium through SOCAMEX S.A.U., its integral water cycle management division.

Local communities

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

the CEO

NFIS 2018 | URBASER



About this Non-Financial Statement

About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and corporate governance

14 Suppliers

As part of its purchasing strategy, URBASER wishes to carry out an efficient and responsible process to manage and oversee its suppliers, throughout its entire selection and evaluation process. Currently, URBASER's Corporate Purchasing Policy, as well as the certification procedures for all its suppliers, are still being designed and approved.

During 2018, URBASER purchased supplies and outsourced services for a total of 23,021 suppliers, for a total amount of over 823,713.815 euros.

Whenever possible, the purchase of goods and services that may impact the quality of services provided by URBASER, its environmental response, and the health and safety of its employees, is done via previously certified suppliers that have been authorised by URBASER.

Likewise, when outsourcing or contracting any service or part of a service, measures are taken to ensure that all subcontracted activities are performed under adequate quality, health, and safety conditions, and that the company's environmental protection policies, the client's requirements, and the worker's physical integrity and rights are respected.



2020 Goal: To conclude the implantation of a supplier's management portal that includes a global standardisation of their approval process.

One of the highlights of 2018 was URBASER's approval of a new **Code of Ethics for its Suppliers**, which serves to solidify stable and long-lasting commercial relationships based on honesty, transparency and trust, with the purpose of achieving progressive improvements in the

NFIS 2018 | URBASER

contracting and purchasing process, including social, gender-equality and environmental criteria in the purchasing strategy. Currently there is no auditing procedure for suppliers.



2019 Goal: To disseminate the Code of Ethics to the sompany's suppliers globally and to publish the Corporate Purchasing Policy.

The purchase strategy for URBASER favours the proximity factor, as long as it is technically and financially viable and the supplier is able to guarantee all requirements. In this way, local businesses, those located in the same regions where each service is being rendered, are always considered during the purchasing process. During 2018, the percentage of all purchases associated to local suppliers was 77%.

Local communities

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

REPSOL

REPSOL, one of URBASER's main suppliers, supplies the company with liquefied fuels. One of the reasons why URBASER decided to make REPSOL one of its main suppliers was because of its ability to guarantee that the goods provided were adapted, at all times, to the specifications set by the Administration through its Competent Bodies.

Just like URBASER, this supplier maintains a firm commitment to sustainability, which it promotes among its employees and throughout all of its own supply chain.

As required by URBASER, REPSOL provides technical assistance to its employees to advise them regarding any possible issues that may arise from storing or using the products supplied, as well as on the implementation and function of facilities and management systems. Furthermore, it has provided URBASER with a monitoring service to control its fuel use.

Likewise, as requested by URBASER, REPSOL's Higher Training Centre is now offering training to URBASER's employees regarding facility maintenance, legislation and product development. These courses are provided in coordination with URBASER, and in accordance with the curriculum required by the company. In this way, the company can ensure that all URBASER's workforce are fully aware of the materials they handle on a daily basis, which reduces the likelihood of accidents.

Statement

About

URBASER

business

Strategic

management

Risks and

opportunities

NFIS 2018 | URBASER

NFIS 2018 | URBASER

Human rights

About this
Non-Financial

TABLE OF REQUIREMENTS FOR THE 2018 STATEMENT OF NON-FINANCIAL INFORMATION

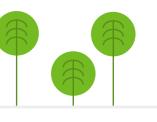
The table below sets out the non-financial information and diversity requirements required by Law 11/2018 of 28 December and the sections of the 2018 Non-Financial Information Statement, which includes:

Scope	Contents	Scope / Perimeter (Global or limited to X countries or companies or facilities)	Related GRI standards	Page / Document section	Observation
Business model	Brief description of the group's business model, which shall include: 1.) its business environment, 2.) its organisation and structure, 3.) the markets in which it operates, 4.) its objectives and strategies, 5.) the main factors and trends that may affect its future evolution.	Global	102-2, 102-6	14-27	
Policies	A description of the policies applied by the group with regard to these issues, which will include: 1.) The due diligence procedures applied for the identification, evaluation, prevention and mitigation of significant risks and impacts	Global	103	28-36	Aspect mentioned throughout the document

2.) Verification and control procedures, including what measures

have been taken.





Local communities

URBASER

professional

team

Health

and safety

Sustainable

environmenta

management

Innovation

Suppliers

Scope	Contents	Scope / Perimeter (Global or limited to X countries or companies or facilities)	Related GRI standards	Page / Document section	Observation
Risks to CP, MP and LP	 The main risks related to those issues linked to the group's activities, including, where relevant and proportionate, its commercial relations, and products or services that may have negative effects on those areas, and how the group manages those risks, explaining the procedures used to identify and evaluate them in accordance with the national, European or international reference frameworks for each subject. This should include information on the impacts that have been identified, giving a breakdown of these impacts, in particular on the main risks in the short, medium and long term. 	Global	102-15	28-36	

Ethics and corporate governance

82

Letter from the CEO

About this

Non-Financial

Statement

NFIS 2018 | URBASER

NFIS 2018 | URBASER Human rights

Scope / Perimeter Page / (Global or Related Scope Contents Document Observation limited to X **GRI** standards countries or section companies or facilities) **Global Environment** 1.) Detailed information on the current and foreseeable effects of the company's activities on the environment and, where relevant, health and safety, environmental assessment or certification procedures; 103, 102-11 31-33, 66-68 2.) Resources dedicated to the Global prevention of environmental risks; 3.) The application of the precautionary principle, the amount of provisions and guarantees for environmental risks. (e.g. derived **Environmental** from the law on environmental issues responsibility). Contamination Measures to prevent, reduce or repair carbon emissions that seriously affect the environment; 31, 38 103, 305-5, Global taking into account any form of 305-7 70-72 air pollution specific to an activity, including noise and light pollution.

Scope	Contents	Scope / Perimeter (Global or limited to X countries or companies or facilities)	Related GRI standards	Page / Document section	Observation
	Circular econon	ny and waste pr	evention and m	nanagement	
	Circular economy	Global		22-23, 37	
	Waste: Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste;	Global	103, 306-2	74	
	Actions to combat food waste.	N/A		9	
Environmental issues	s	ustainable use	of resources		
	Water consumption and water supply according to local constraints;	Global	103, 303-1, 303-3	72-73	
	Consumption of raw materials and measures taken to improve the efficiency of their use;	Global	103, 301-1	73	
	Direct and indirect consumption of energy, measures taken to improve energy efficiency and the use of renewable energies.	Global	103, 302-1, 302-3, 302-4	68-69	

Local communities

URBASER

professional

team

Health

and safety

Sustainable

environmental

management

Innovation

Suppliers

About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and corporate governance

84

Letter from the CEO

NFIS 2018 | URBASER

NFIS 2018 | URBASER Human rights

Scope / Perimeter About this (Global or Page / Related Scope Contents Non-Financial limited to X Document Observation **GRI** standards Statement countries or section companies or facilities) Climate Change About The significant elements of URBASER greenhouse gas emissions generated as a result of the com-Global 70-71 pany's activities, including the use of the goods and services that it produces; 103, Our 305-1, 305-2, business Measures taken to adapt to the 31, 38, 305-3, Global model 70-71 consequences of climate change; 305-4, 305-5, 305-7 Voluntary medium- and long-Environmental term reduction targets to reduissues 38, 70-71 Strategic ce greenhouse gas emissions Global and the means implemented to management that end. **Protection of biodiversity** Risks and Measures taken to preserve or Global 32, 75 opportunities restore biodiversity; 103, 304-1, 304-2 Impacts caused by activities or Global 32, 75 operations in protected areas.

Scope	Contents	Scope / Perimeter (Global or limited to X countries or companies or facilities)	Related GRI standards	Page / Document section	Observation
		Jobs & Ca	reers		
	Total number and distribution of employees by sex, age, country and professional classification;		103, 102-8, 405-1	52, 54	
Total number and distribution of employment contract modalities,	102-8	54			
	Average annual number of permanent contracts, temporary contracts and part-time contracts by sex, age and professional classification,	102-8, 405-1	53		
Social and	Number of dismissals by sex, age and professional classification;		103	54-55	
personnel issues	Average pay and its evolution broken down according to sex, age and professional classification or other equal value; salary gap, the remuneration of equal or average positions in society,	Limited*	405-2, 103	56	
	Average remuneration of directors and executives, including variable remuneration, allowances, compensation, payment to long-term pension schemes and any other categories broken down according to sex,		103	56	
	Implementation of labour disconnection policies,		103	60	
	Employees with disabilities.		405-1	50-51, 58-59	

Local communities

URBASER

professional

team

Health

and safety

Sustainable

environmental

management

Innovation

Suppliers

Ethics and corporate governance

86

Lette	r	fror
the	(CEO

Human rights

Local

communities

URBASER

professional

team

Health

and safety

Sustainable

environmental

management

Innovation

About this Non-Financial Statement

About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and

corporate governance

Scope	Contents	Scope / Perimeter (Global or limited to X countries or companies or facilities)	Related GRI standards	Page / Document section	Observation
		Work organ	isation		
	Organisation of working time	Limited*		60	
	Number of hours of absenteeism	Limited*		55	
Social and personnel issues	Measures aimed at facilitating the enjoyment of conciliation and encouraging the joint responsibility exercise of these by both parents.	Limited*	103, 403-2	60	
		Health & S	Safety		
	Occupational health and safety conditions;	Limited*	103,	62-65	
	Accidents at work, in particular their frequency and seriousness, occupational diseases, disaggregated by sex.		403-1, 403-2, 403-3	63	

Scope	Contents	Scope / Perimeter (Global or limited to X countries or companies or facilities)	Related GRI standards	Page / Document section	Observation
		Social rela	ations		
	Organisation of social dialogue, including procedures for informing, consulting and negotiating with staff;	Limited*		52-53	
	Percentage of employees covered by collective bargaining agreements by country;	Limited*	103, 102-41	53	
Social and personnel issues	The balance of collective agreements, particularly in the field of health and safety at work.	Limited*		65	
		Trainir	ng		
	The policies implemented in the field of training;	Limited*		60	
	The total number of hours of training per professional category.	Limited*	103, 404-1	61	

Suppliers

^{*}Limited: includes companies in which the majority of shares or management control is held and that have a turnover of over 0.1% of the total. This implies that the information covers 95% of the company's total turnover.

Letter from the CEO

NFIS 2018 | URBASER

NFIS 2018 | URBASER

Human rights

About this Non-Financial Statement	Scope	Contents	Scope / Perimeter (Global or limited to X countries or companies or facilities)	Related GRI standards	Page / Document section	Observation
		Universal ac	cessibility for p	ersons with dis	abilities	
About URBASER			Equalit	ty		
		Measures taken to promote equal treatment and opportunities for women and men;	Limited*		56-58	
Our business model	Social and personnel issues	Equality plans (Chapter III of Organic Law 3/2007, of 22 March, for the effective equality of women and men), measures adopted to promote employment,	Limited*	103	56	
Strategic management	protocols against sexual and sex-based harassment, integration and universal accessibility for persons with disabilities;		Liniiod		30	
		Policy against all types of discrimination and, where appropriate, the management of diversity.	Limited*		56-59	

Scope	Contents	Scope / Perimeter (Global or limited to X countries or companies or facilities)	Related GRI standards	Page / Document section	Observ
	Complaints about cases of human rights violations;	Global		44	
Human rights			43-44		
	The elimination of discrimination in employment and occupation;	Global	406-1, 408-1, 409-1	43-44, 56-58	
	The elimination of forced or compulsory labour;	Global		43-44	
	The effective abolition of child labour.	Global		43-44	
	Measures taken to prevent corruption and bribery;	Global	103, 102-16, 102-17, 205-2, 205-3	34-35, 42	
Corruption and bribery	Measures to combat money laundering,	Global	205-2	34-35, 42	
	Contributions to foundations and non-profit entities.	Limited*	413-1	45	

Local communities

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

Risks and opportunities

Ethics and corporate governance

90

Letter	fron
the C	EΟ

NFIS 2018 | URBASER

Human rights

About this
Non-Financial
Statement

About URBASER

Our business model

Strategic management

Risks and opportunities

Ethics and
corporate
governance

Scope	Contents	Scope / Perimeter (Global or limited to X countries or companies or facilities)	Related GRI standards	Page / Document section	Observation		
	Commitments of the company to sustainable development						
Company	The impact of company's activity on employment and local development;	Limited*	103, 102-12, 102-13, 102-43, 203-2, 204-1, 413-1	45-51			
	The impact of the company's activity on local populations and the territory;	Limited*		46-47			
	The relationships maintained with the actors of the local communities and the modalities of dialogue with them;	Limited*		48-51			
	Association or sponsorship initiatives.	Limited*		45			
	Subcontracting and suppliers						
	 The inclusion in the purchasing policy of social, gender equality and environmental issues; Consideration in relations with suppliers and subcontractors of their social and environmental responsibility; 	Global	103, 102-9	80-81			
	Supervision systems and audits and their results.	N/A		80-81			

Scope	Contents	Scope / Perimeter (Global or limited to X countries or companies or facilities)	Related GRI standards	Page / Document section	Observation		
	Consumers						
Company	Measures for the health and safety of consumers;	Global	103	9, 36			
	Complaints systems, complaints received and their resolution.	N/A		9			
	Tax information						
	Benefits obtained country-by-country Taxes on benefits paid	Global	103	15			
	Public subsidies received	Global	201-4	12			
Other significant information	Corporate Governance	Global	102-18	39			
	Stakeholder participation	Global	102-43	7-10			
	Other useful information on the preparation of the document	Global	102-47, 102-56	6-11			

communities

Local

URBASER professional team

Health and safety

Sustainable environmental management

Innovation

Suppliers

^{*}Limited: includes companies in which the majority of shares or management control is held and that have a turnover of over 0.1% of the total. This implies that the information covers 95% of the company's total turnover.

Statement

About

URBASER

husiness

model

management

Risks and

opportunities

INDEPENDENT VERIFICATION

NFIS 2018 | URBASER



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 translat

INDEPENDENT VERIFICATION REPORT

To the shareholders of Urbaser:

Pursuant to Article 49 of the Code of Commerce, we verified, under a limited level of assurance, the accompanying Statement of non-financial information (hereinafter "NFS") for the year ended 31 December 2018 of Urbaser and subsidiaries, making up the Urbaser Group (the Group), which forms part of the Group's consolidated management report.

The content of the consolidated management report includes information additional to that required by current mercantile regulations which has not been covered by our verification work. In this respect, our work was limited solely to verifying the information identified in the section "Non-Financial Information Statement 2018 Table of Requirements", included at the end of the NFS attached.

Responsibility of the Management

The preparation of the NFS included in the Group's consolidated management report and the content thereof are the responsibility of the Directors of Urbaser. The NFS has been drawn up in conformity with the provisions of prevailing mercantile regulations and the Sustainability Reporting Standards of the Global Reporting Initiative ("GRI Standards"), in line with the details provided for each matter in the table included in the section "NFIS 2018 Table of Requirements", included at the end of the NFS

This responsibility also includes the design, implementation and maintenance of the internal control considered necessary to ensure that the NFS is free from material misstatement due to fraud or error.

The management of Urbaser are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the NFS is obtained as well as for the application of Standard AA1000APS (2008).

Our independence and quality control

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

Our firm applies the International Standard on Quality Control 1 (ISQC 1) and therefore has in place a global quality control system which includes documented policies and procedures related to compliance with ethical requirements, professional standards and applicable legal and regulatory provisions.

The engagement team was made up of professionals specialising in non-financial information reviews and specifically in information on economic, social and environmental performance.

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Our responsibility

Our responsibility is to express our conclusions in an independent verification report to a limited level of assurance based on the work carried out in relation solely to fiscal year 2018. The data relating to previous years were not subject to the mandatory verification envisaged in current mercantile regulation. Our work was carried out 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) and with the Guidelines for verification engagements on non-financial statements issued by the Spanish Institute of Auditors ("Institute of Censores Jurados de Cuentas de España").

In a limited assurance engagement, the procedures performed vary in terms of nature and timing, and are more limited than in a reasonable assurance engagement. Accordingly, the assurance provided is

Our work consisted of posing questions to Management and various Group units that were involved in the preparation of the NFS, the review of the processes for compiling and validating the information esented in the NFS and the application of certain analytical procedures and review sampling tests, as

- · Meetings with Group personnel to understand the business model, policies and management approaches applied and the main risks related to these matters, and obtain the information required
- Analysis of the scope, materiality and completeness of the content of the NFS for 2018 based on the materiality analysis performed by the Group, taking into account the content required by prevailing mercantile regulation.
- Analysis of the procedures used to compile and validate the information presented in the NFS
- Review of information concerning risks, policies and management approaches applied in relation to material matters presented in the NFS for 2018.
- Verification, through sample testing, of the information relating to the content of the NFS for 2018 and its adequate compilation using data supplied by Group information sources.
- Obtainment of a management representation letter from the Directors and Management.

Conclusion

Based on the procedures performed in our verification and the evidence we have obtained, no matters have come to our attention that might lead us to believe that the Group's NFS for the year ended 31 December 2018 has not been drawn up, in all significant respects, pursuant to prevailing mercantile regulations and GRI standards, in accordance with each topic in the tables in the section "NFIS 2018" Table of Requirements", included at the end of the NFS attached.

Use and distribution

This report has been drawn up in response to the requirement laid down in prevailing Spanish mercantile regulation and therefore might not be suitable for other purposes or jurisdictions.

PricewaterhouseCoopers Auditores, S.L.

Original in Spanish signed by Pablo Bascones

May 17th, 2019

Local communities

URBASER professional team

Health and safety

Sustainable environmenta management

Innovation

Suppliers

94

Ethics and corporate

governance

