

REPORT ON THE VERIFICATION OF INFORMATION INCLUDED IN THE NON-FINANCIAL INFORMATION STATEMENT ISSUED BY AN INDEPENDENT VERIFIER

To GRUPO PRISA shareholders:

Pursuant to Law 11/2018dated 28 December (hereinafter, "Law 11/2018"), we have proceeded to the verification of the information included in the non-financial information statement of GRUPO PRISA for the year ended 2022.

We believe that based on the procedures applied and the evidence obtained during the verification process that we have carried out, the subject of this report, we have not come to our knowledge any question that leads us to believe that the verified information has not been prepared in all its significant aspects in accordance with the requirements of Law 11/2018.

Methodology and Verifier team

SGS' methodology for the verification of non-financial information consists of audit procedures and mechanisms to verify information and indicators, commonly accepted within the scope of the Conformity Assessment Bodies (as defined by Regulation (EC) no. 765/2008), such as the audit guidelines contained in standard ISO 19011, and particularly:

- Review of non-financial information in accordance with the requirements of Law 11/2018
- Interviews with staff responsible for obtaining and preparing data
- Review consisting of sampling of documents and records (both internal and public)
- Check consisting of checking the reliability and traceability of data
- Assessment of systems for the collection, management and handling of the information and indicators

The verification team was formed by qualified personnel of SGS International Certification Services Ibérica, S.A.U., who had a technical competence based on the experience of the different sectors of activity essential for the issuance report.

Independence

We are an independent entity to GRUPO PRISA in accordance with the ethics requirements, including those related to independence that are applicable to our activities.

Other information from the Management Report

In relation to the verification carried out, it is expressly stated that the regulatory obligation covers only the non-financial reporting statement for the 2022 financial year, with the rest of the content of the report being excluded from that process management.

The responsibility of the independent verifier is to issue this report once the content of the status of the non-financial information provided by the administrators of the Company subject to the verification process has been verified. If, based on the work done, we conclude that there are caveats, we are obliged to report them.



REPORT ON THE VERIFICATION OF INFORMATION INCLUDED IN THE NON-FINANCIAL INFORMATION STATEMENT ISSUED BY AN INDEPENDENT VERIFIER

The administrators' responsibility in relation to non-financial information

The administrators of the parent company are responsible for the formulation of the consolidated management report and the non-financial information detailed in accordance with paragraph 6 of Article 44 of the Code of Commerce, approved by Real Decreto dated 22 August 1885, amended by Law 11/2018, dated 28 December, amending the Code of Commerce.

The independent verifier's responsibility

The objective of the mission entrusted to us has been limited to obtaining limited assurance that non-financial information is free from material inaccuracies and to issuing a verification report of the information included in the state of non-financial information containing our opinion.



fecha

Signed: Juan José Fontalba SGS International Certification Services Ibérica, S.A.U

NOTE: "This document has been originally drafted in Spanish, which will therefore prevail over the English language version in the event of any discrepancy."



5. NON- FINANCIAL INFORMATION STATEMENT

5.1. ABOUT THIS REPORT

The purpose of this Non-Financial Information Statement (hereinafter NFIS) is to reflect PRISA Group's annual performance in environmental, social, corporate governance, personnel and human rights matters of relevance to the company. It highlights the contribution to sustainable development and the main actions and projects undertaken, while giving continuity to the reports prepared in previous years. It also reflects PRISA's contribution to the United Nations 2030 Agenda, describing the activities and impact associated with the seven Sustainable Development Goals (SDGs) of priority for the Group.

All these commitments are included in PRISA's first 2022-2025 Sustainability Master Plan, approved by its Board of Directors in October 2022, which sets out the company's roadmap for environment, society and governance (ESG). It is the result of the important steps the Group has taken in the year to integrate sustainability and social, environmental and governance criteria into company strategy, following the creation of the Sustainability Committee – the Board body that supervises their implementation – and the Group's Sustainability Department, both led by women.

PRISA's Sustainability Policy (approved by the Board of Directors in December 2018 and revised in 2020 and February 2022) establishes a general reference framework to guarantee responsible behaviour with the main stakeholders. Its objective is to achieve the Group's sustainable development and promote social interest, fostering a culture of ethics and compliance, accompanying the development of the social environments in which it operates and using the resources necessary for its activity in a sustainable manner with the idea of creating shared value with all its stakeholders. The document is available on the PRISA Group's corporate website (www.prisa.com).

This report gathers the data and information of the business units of PRISA Group (Prisa Media and Santillana) in the 23 countries in which it operates. It shows the activities and actions carried out by PRISA companies in those countries, with exceptions identified throughout the report and in different tables. Most of the data reported is aggregated (at Group level) or broken down (by business units), depending on the nature of the information, to make it easier for readers to understand.

This NFIS has been prepared in compliance with the requirements set out in Law 11/2018 of December 28 on non-financial reporting and diversity. It is based on, among other aspects, a new materiality analysis carried out in July 2022, which reflects the expectations of the different interest groups, and on the Group's updated non-financial risk map.

As the NFIS is included in the PRISA Consolidated Management Report as an additional chapter, information required in the Non-Financial Information Statement will be incorporated by reference to other sections of the wider Management Report. For this purpose, reference may be made to the Annual Corporate Governance Report attached as an appendix to the Consolidated Management Report and to the PRISA Group's Consolidated Notes to the Financial Statements for 2022, both of which are published and accessible on PRISA's corporate



website in the Shareholders and Investors section. The PRISA Group also publishes an annual Sustainability Report, which complements this NFIS.

The procedure for producing the Group's NFIS is based on standardised report for all business areas, which includes the data corresponding to the performance indicators referred to above.

The final table of contents and correlation with the indicators of Law 11/2018, Global Compact Principles and SDGs identifies those aspects that are material and non-material, given its activity, based on the PRISA Group's materiality study and the analysis carried out on the company's non-financial risks.

The Group has also presented the information referred to in this GRI table of contents for the period of January 1, 2022, to December 31, 2022 using the GRI Standards as a reference.

5.2. PRISA, A GLOBAL LEADER IN EDUCATION AND INFORMATION

PRISA is one of the main education and media groups in the Spanish-speaking world and a benchmark in the creation and distribution of cultural, educational, news and entertainment content in the Spanish and Portuguese language markets and in the growing Spanish-speaking market in the United States.

Through its business units, with brands such as El País, Santillana, Moderna, Compartir, UNO, Ser, Los40, WRadio, Radio Caracol and AS, the Group is present in 23 countries, positioning itself as a global multimedia group in the education, information and entertainment businesses, with a potential market of more than 700 million people.



Operating in two sectors with a great social impact, as are education and communication, PRISA is aware of the responsibly of its mission to contribute to people's development and the progress of society in the countries in which it is present.

This social commitment is backed by the company's values:

- Independence, rigor and pluralism in carrying out their work as reporters, educators and communicators.
- Defence of progress, freedom, democracy and equal rights and opportunities.
- Creativity and innovation in business development.
- Response to the demands and concerns of society and stakeholders.



- Responsible, efficient and sustainable management, generating value for the shareholder and for society.
- The Group puts people at the centre of everything it does, promoting talent management.

PRISA's business model and business and sustainability strategy are imbued with this drive to be transformative and to generate a positive impact.

5.2.1. BUSINESS MODEL: MARKETS, SECTORS, BUSINESS ENVIRONMENT, ORGANISATION AND STRUCTURE

The PRISA Group is organised in two business units: Santillana (education) and Prisa Media (information and entertainment), as indicated in note 17 of the Notes to the consolidated statement.

Santillana brings together the production of educational content and services, and Prisa Media has all the company's news media. They each encompass a series of brands that bring the Group's offer to millions of people. The PRISA Group has a corporate centre (PRISA), which sets the Group's strategy and ensures our businesses are in alignment with it.

The Group has carried out its activities through its business units in a complex macroeconomic environment (as described in note 1 of the consolidated management report), which has been aggravated by different events with great global repercussions: the COVID-19 pandemic, war in Ukraine, disruptions in the supply chain, increased inflation rates, more expensive energy resources and rising interest rates, among others.

According to data from 2022, 38.5% of its operating income was generated in Spain and 61.5% internationally, the latter representing a proportionate increase over 2021.

PRISA Group operating income by geographical origin	2022	2021
Spain	38.5%	43.1%
International	61.5%	56.9%
PRISA Group operating income	2022	2021
Main countries (Spain, Brazil, Mexico, Colombia, Argentina and Chile)	88.1%	88.7%

PRISA Group operating income by business unit	2022	2021
Education (Santillana)	52.6%	48.3%
Media (Prisa Media)	47.4%	51.7%

International income as a proportion of the Group's total income has increased compared to 2021. Six countries account for 88% of the Group's income in 2022: Spain, Brazil, Mexico, Colombia, Argentina and Chile.

Business performance and the factors and trends affecting the business model are described in Notes 1 and 2, respectively, to the consolidated management report.



We describe below, for each Business Unit, its markets and sectors, business models, business environment and organisational structure, and its goals and strategies.

Santillana

Through brands such as Santillana, Compartir, UNOi, Moderna, Norma and Richmond Solution, the company creates and distributes educational content and services in Spanish, Portuguese and English, for all levels of education, for 3 to 18-year-olds (with special focus on K-12 sector (primary and secondary education), adapted to the regulations and educational models of the 20 countries where it operates (Portugal and 19 countries in Latin America). Since the end of 2020, Santillana is not already present in Spain, except for its corporate centre)

Brazil and Mexico account for 59.4% of the Group's total operating income in 2022.

Operating income Santillana	2022	2021
Main countries (Brazil and Mexico)	59.4%	60.6%

The business model is focused on the sale of educational content and services in the private and public education market. The private market accounts for 70% of Santillana's business in 2022 and the public market 30%.

Santillana's value proposition for the private market is an offer of educational solutions through two business models: the didactic model; and the subscription model based on educational systems.

The didactic model is the traditional business focus, based on the sale of textbooks where normally, the customers are the public schools, the purchase decision is made by the teachers and/or the school principals or owners, the buyer of the product is the parent of the pupil, and the end user is the pupil. In 2022, this model accounted for 26% of Santillana's business.

The business units prioritises its focus on the subscription model, based on educational systems using the Santillana educational technology platform, which is scalable globally, and which includes in its offer a comprehensive service aimed at schools, teachers and pupils, combining technology, training and advice.

This is a business model where contracts are signed with schools for a term, typically 3 or 4 years, for the provision of the service through hybrid (online and offline) education systems that they offer to schools: complete curriculum solutions (comprehensive systems), more flexible modular curriculum solutions according to the demand of the school in each case (flexible systems and English systems) and solutions beyond the curricula to complete the learning pathway of the pupils (supplementary systems).

Main Santillana indicators	2022	2021
Total subscriptions (millions)	2.6	2.0
Schools (no.)	8,923	6,868
Learning System users (millions)	3.7	2.8



Santillana's value proposition for the public market focuses on offering solutions for the programmes of public invitations to tender and bid announced regularly by some governments in Latin America.

All of this has made Santillana the leading educational content and services company in the Spanish and Portuguese languages field. In 2022, around 28 million students used Santillana educational content, with 2.6 million student subscriptions for study through comprehensive, flexible and disciplinary learning systems, representing a 33% increase on 2021.

Santillana is structured by country and has a corporate centre to coordinate and guide the strategy of the entire Business Unit.

Prisa Media

On the basis of its two core businesses, radio and press, Prisa Media has developed a wide range of content that has transcended traditional media and has been reinforced by the development of a complementary offer based on differential capabilities in audio and video. Prisa Media focuses on the generation of news, sports, music and entertainment content in multiple formats, for distribution through different media and offline and online platforms, both proprietary and third-party.

With brands such as El País, AS, Cinco Días, Cadena Ser, Los40, Cadena Dial, Radio Caracol, WRadio and Podium Podcast, among others, Prisa Media is present in 12 countries directly or through franchises, being the leading media company in the Spanish-speaking world and the largest radio group in Spanish.

By geographical area, in 2022, 80.6% of its operating income was from Spain and the remaining 19.4% was international.

Operating income Prisa Media	2022	2021
Spain	80.6%	82.1%
International	19.4%	17.9%

The business model focuses on two main lines of activity: advertising (accounting for 76.7% of revenues), and circulation, both digital and print (13.3% of total revenues).

These lines of activity are complemented by the organising and management of events and the distribution of promotions, as well as the identification of new alternative ways of generating income that are becoming more concrete as the digital transformation accelerates. In 2022, the Prisa Media consolidation perimeter incorporated Lacoproductora, which is fully integrated into its Video structure for the creation, marketing, and production of audio-visual products.

In December 2022, El País had more than 266,000 total subscribers, Radio had an aggregate audience of nearly 23 million listeners across all its brands, and in audio there were 45 million downloads and 80 million hours of streaming on average per month during the year. The aggregate online audience of all Prisa Media's digital media was 231 million unique browsers from around the world.



Main indicators	2022	2021
Total, no. of El País subscribers	266,107	176,760
Daily average of radio listeners (millions)	23	22
Monthly average of audio downloads (millions)	45	34
Monthly average TLH (Total Listening Hours) (millions)	80	67
Monthly average of unique browsers (millions)	231	251

5.2.2. BUSINESS STRATEGY

The Group's short, medium, and long-term strategy is to grow its Education and Media businesses, leveraging digital transformation and subscription models. This strategy is set in the context of a firm commitment to sustainability and ESG criteria and is aligned with the Sustainable Development Goals (SDGs) set in 2015 by the United Nations General Assembly. The Group's strategy integrates the strategic plans of its various business units with clear business objectives: to maximise cash generation and control debt to optimise the balance sheet structure.

Santillana focuses on business growth driven by expansion in the markets operated and by the continued development of subscription models based on educational systems, always preserving the quality of education, and putting the educational community in general and the student body in particular at the epicentre of the company's activity. To this end, it sets itself four key objectives:

- 1. Maintain the position as one of the leaders in our sector expanding into new growth segments.
- 2. Continue to lead the digital transformation and the development of hybrid education solutions (online and offline) as part of education systems under subscription models. Always with a focus on improving the learning experience in a holistic way.
- 3. Enhance a quality offer of complementary educational products and services that contribute to improving the quality of the learning process.
- 4. Continue to focus on cutting-edge technology as the driving force behind the future educational technology proposition. Placing Big Data applied to pedagogy as a strategic asset to better understand the use of the educational platform and optimise the user experience.

In short, commit to student-centered education that empowers teachers to improve education, providing service and support to schools and families, with innovation and creativity at the heart of learning.

All of this while promoting and disseminating an agenda of social and environmental responsibility among the millions of users (children, young people, teachers, etc.) who benefit from Santillana's educational proposals. This will contribute to creating better life opportunities for future generations, an irrevocable commitment of Santillana as an educational company.



Meeting these strategic objectives will allow Santillana to continue to increase revenues, improve margins and, therefore, increase the profitability of the Education business, consolidating Santillana as one of the leading educational technology companies in Latin America.

PRISA's strategic roadmap in the Media area focuses on accelerating digital transformation, reinforcing the leadership of the brands, and maintaining them as a benchmark in quality information and entertainment. This roadmap is embodied in the following key strategic objectives:

- 1. Provide entertainment and guarantee quality information to society by generating an objective, contrasted, diverse, critical, and inclusive vision of the reality of events.
- 2. Continue to reinforce the leading position of Prisa Media's brands and digital properties by expanding their impact and (global) reach to further increase market share.
- 3. Expand digital audiences in Spain and Latin America.
- 4. Accelerate the digital transformation from offline models to user-oriented and user-focused multimedia digital models.
- 5. Strengthen the commercial strategy with diversification of commercial proposals and continue to promote the different monetisation channels.

5.2.3. SUSTAINABILITY STRATEGY

Sustainability Master Plan

The PRISA Group has maintained a firm commitment to sustainable development for many years. In 2018, it approved its Sustainability Policy, which was modified and updated in 2022 (available on the corporate website www.prisa.com) and in November its first Sustainability Master Plan (SMP), for 2022-2025, was issued.

The 2022-2025 Sustainability Master Plan responds to the need to structure PRISA's ambition, demonstrate its commitment and highlight the impact of its businesses in the area of ESG. It was prepared as a result of the mandate of the Board of Directors and its Sustainability Committee, which assumes the commitment to ensure its correct implementation, and of the executive presidents of both business units and the Group's Sustainability Department. It also helps Group to be prepared to respond to the new European regulations on reporting and due diligence of business sustainability.

This plan marks the Group's roadmap in terms of sustainability for the coming years, connecting its strategic lines, objectives, and actions with the business to help provide more value and enhance its growth opportunities.

The SMP is aligned with three major commitments: continuing to generate a positive impact on people through PRISA's content and services, so that they become aware of the great social and environmental challenges we face as a society; responsible management of talent, the supply chain, and the environment; and, lastly, governance committed to transparency, ethics and compliance. and the integration of sustainability into the Group's financial strategy, taking into account social and environmental factors in investment and financing decisions.



Three pillars with which PRISA aspires to promote the transition towards sustainable development as a driving agent of social and climate transformation, with a real and positive impact on people.

3 major	Impact on students, schools, audience, and society	Driving global sustainability through education and information	
commitments		Committing to change from within	
Commitments	Responsible management	Acting to reduce our environmental impact and	
		managing talent and the supply chain responsibly	
	Committed governance	Governance with transparency	

	Responsible management				
2022/2025 Master Plan	Impact on students, schools, audience, and society	17 priorities	27 strategic lines	69 objectives	76 shares
	Committed governance				

In order to improve communication of the Group's projects and milestones related to sustainability and the progress of its master plan to employees and other stakeholders, the Prisa IMPACTA concept was created in November to use different channels to raise awareness and spread information about these actions.

Enhancing PRISA's sustainability strategy and connecting it with the company's business strategy has also raised the Group's presence in ESG indices and ratings, such as MSCI, Sustainalytics, FTSE4Good and ESG Climate Risk (Moody's), although the Group's financial performance continues to condition any potential improvements in ratings.

In December 2022, the company was in the top quartile of the media and entertainment sector in the S&P Global Corporate Sustainability Assessment and improved its rating by more than 13 points compared to 2021 (60 vs. 47) in the Bloomberg ESG Transparency Index.

As regards Diversity and Equality, this year the Group was incorporated into the IBEX Gender Equality Index. This means PRISA now forms part of this index, as women are present both on its Board and in senior management positions, at rates of more than 25% and 15% respectively. Note that refinancing of the Group took place in 2022 and that, for the first time, an improvement of margins linked to ESG criteria was established in it.

The financial sustainability of the businesses and sustainability linked to social, environmental, and governance aspects make up the company's roadmap.



5.2.3.2. Dialogue and communication with stakeholders

PRISA Group stakeholders		Usual communication channe	ls
Shareholders and investors	Core shareholders, institutional investors, minority shareholders, analysts	Shareholders' meetings, National Securities Market Commission (CNMV), corporate website, Investor Relations Department and Shareholders' Office (meetings with shareholders and investors, conference call of results, electronic mailboxes, telephone and other communication channels).	
Users	Readers, listeners, educational community, pupils, etc.	Events, forums, websites, <i>newsletters</i> , social media, interviews, contests, surveys, reader's ombudsman, mailboxes, customer service, educational portals, promotional material, etc.	
USEIS	Customers, advertisers, advertising agencies, education sector	Commercial network, events, forums, websites, telephone, <i>newsletters</i> , promotional material, meetings with advertisers and agencies, etc.	External complaints
Employees		Newsletters, intranet, blog, internal communications, trade union committees, internal complaints channel, suggestion box, results meetings, etc.	channel
Company	General public, NGOs, associations, foundations, cultural and educational institutions	Collaboration agreements, discussion forums, fairs and events, etc.	
Opinion leaders		Press releases, websites, e-mail, phone, interviews, meetings, social media, etc.	
Regulators, administration and authorities		CNMV website, institutional relations, tenders, events, etc.	
Suppliers / Partners		Corporate website, telephone, direct contact, congresses, meetings, e-mail, etc.	

5.2.3.3. Materiality

In 2022, PRISA carried out a new materiality analysis to identify important issues on which the company should focus.

For this, an external analysis was carried out to look at, among other aspects, trends in sustainability, regulatory requirements and a study of the education and communication sector. To prepare the consultation, the external stakeholders most relevant to the corporate strategy and at sector level were selected, including readers, shareholders, analysts, suppliers, social entities, schools, and directors.

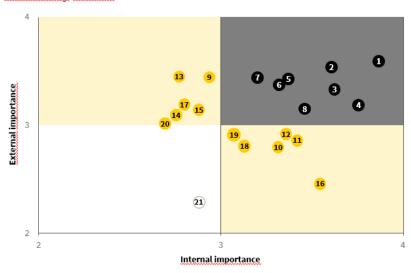
Internally, interviews were held with the management teams of the business units and with senior management, and a survey was carried out on all Group employees, as well as the rest of the external interest groups.



More than 2,000 responses from stakeholders were considered in the analysis, which identified 21 material issues for PRISA. These have been validated and approved by the Sustainability Committee and finally approved by the Board of Directors.

The process of prioritising these issues resulted in a materiality matrix that indicates eight critical or highly relevant issues, which provided the basis for preparing the 2022-2025 Sustainability Master Plan and PRISA's Non-Financial Information Statement.

Materiality matrix 2022



Material issues

Very significant issues

- 1. Integrity, independence, and freedom of expression
- 2. Quality, inclusive, and equitable education
- 3. Responsible governance
- 4. Compliance, integrity, and ethics
- 5. Talent management and development
- 6. Diversity and equality in the workplace
- 7. Transparency and communication with stakeholders 8. Responsible content

Significant issues

- 9. Awareness of social issues and respect for the environment
- 10. Responsible advertising
- 11. Protection of privacy and data security
- 12. Digital transformation in products and innovation
- 13. Fight against climate change
- 14. Accessibility of its information,
- entertainment and education contents
- 15. Promotion of work-life balance and flexible working arrangements
- 16. Financial performance
- 17. Promotion of social impact
- 18. Responsible value chain
- 19. Customer engagement
- 20. Managing impact in other environmental aspects

Other significant issues

21. Employee health and well-being



5.2.3.4. Sustainable Development Goals

The 17 Sustainable Development Goals (SDGs) were approved by the United Nations in 2015 as a universal call to end poverty, protect the planet and ensure that by 2030 all people enjoy peace and prosperity.

Agenda 2030 is more ambitious than previous proposals and recognises the essential role of companies as actors for its fulfilment.

The Group is committed to the Sustainable Development Goals (SDGs) and collaborates in disseminating and applying Agenda 2030 in the business sector.

With this Master Plan of almost 80 actions, PRISA makes a bigger contribution to achieving seven Sustainable Development Goals (SDGs) considered of priority for its activity: quality education (SDG 4); gender equality (SDG 5); decent work and economic growth (SDG 8); reduction of inequalities (SDG 10); responsible consumption and production (SDG 12); climate action (SDG 13); and peace, justice, and strong institutions (SDG 16). Plus, the cross-cutting SDG of partnerships for achieving the goals (SDG 17).

5.3. COMMITTED GOVERNANCE

PRISA's governing bodies exercise vigilance and leadership regarding the Group's commitment to sustainability. Thus, decision-making at the highest level promotes the business project by seeking the best balance between economic benefit, social contribution, and environmental protection to guarantee the interests of investors, shareholders and the rest of the PRISA Group's stakeholders, now and in the future.

5.3.1. GOVERNANCE BODIES

5.3.1.1. Sustainability Committee

The Sustainability Committee was constituted in 2022 as one of the important steps taken by PRISA during year to integrate sustainability and ESG (environmental, social, and corporate governance) criteria into the company's strategy.

In February 2022, the Board modified the Regulations of the Board of Directors and the Sustainability Policy, to regulate the composition, operation, and powers of the new Sustainability Committee, as well as to reorganise the responsibilities of other committees in matters of sustainability. In line with the good governance recommendations of the CNMV, this modification results in economic, social and environmental issues being included in the Board's functions, and various responsibilities for decision-making on these ESG aspects being assigned to its different committees.

The Sustainability Master Plan launched by PRISA in 2022 was the result of the mandate of the Board of Directors and its Sustainability Committee, which assumes the commitment to ensure its correct implementation, and of the executive presidents of both business units and the Group's Sustainability Department.



5.3.1.2. Policy on selecting directors and diversity.

The PRISA Board of Directors is made up of 14 directors, all of whom are highly qualified and honourable professionals, with skills and competencies in different areas and sectors of interest to the Group, and from different countries, in application of the principles set out in the Diversity Policy for the composition of the Board of Directors and the selection of directors and in the Board of Directors Regulations. The board members have different academic backgrounds and outstanding professional careers (see profile and biographical note at www.prisa.com).

The principles and objectives of the Diversity Policy in the composition of the Board of Directors and the selection of directors of the Company can be summarised as follows:

- Diversity in the composition of the Board in its broadest sense (knowledge, experience, background, age and gender), with special emphasis on gender diversity, in relation to which: (i) the Company will be encouraged to have a significant number of female senior managers and (ii) the objective is that by the end of 2022 and thereafter, the number of female directors will represent at least 40% of the total number of members of the Board of Directors, but no less than 30% earlier.
- Appropriate balance in the Board as a whole, enriching decision-making and bringing pluralistic viewpoints to the debate on matters within its competence.

In January 2023, the PRISA Appointments, Remuneration and Corporate Governance Committee (CNRGC) carried out the annual verification of compliance with the Diversity Policy in the composition of the Board of Directors and the selection of directors, concluding that the composition of the PRISA Board of Directors is reasonably diverse in terms of knowledge, experience, origin and age of the directors, with a positive balance overall, and that the number of members and the structure is appropriate to the needs of the company.

The above-mentioned Policy promotes the application of diversity criteria that refer not only to gender. The Appointments, Remuneration and Corporate Governance Committee has verified that, during 2022, the principles, objectives and procedures set out in the Diversity Policy have been taken into account in the composition of the Board of Directors and the selection of directors, with the exception of the target of a minimum female presence of 40% on the Board by the end of the year.

The presence of women on the Board remained stable in 2022, so that at the end of 2022 there was no change compared to year-end 2021 (5 female directors, representing 35.7% of the total members of the Board of Directors).

The evolution, in recent years, has been as follows:

Number of women on the Board				% of total Board Members			
2022	2021	2020	2019	2022	2021	2020	2019
5	5	2	3	35,71%	35,71%	16,66%	23,08%



However, it is to be noted that on February 28, 2023, PRISA's Board of Directors appointed Pilar Gil Miguel as executive director, so that, as of that date, the Board has 6 women members, representing 42.86% of the total number of members.

In any event, although the mentioned target of 40% was not reached at the year-end 2022, the five PRISA female directors had a notable presence on the Company's bodies:

- Beatriz de Clermont-Tonnerre is coordinating director, chair of the Appointments, Compensation and Corporate Governance Committee, and a member of the Delegate Committee and of the Sustainability Committee.
- Teresa Quirós chairs the Audit, Risks and Compliance Committee and forms part of the Sustainability Committee.
- María Teresa Ballester chairs the Sustainability Committee and forms part of the Audit, Risks and Compliance Committee.
- Carmen Fernández de Alarcón is a member of the Audit, Risks and Compliance Committee, the Appointments, Remuneration and Corporate Governance Committee and the Sustainability Committee; and
- Pepita Marín Rey-Stolle is a member of the Delegate Committee and of the Audit, Risks and Compliance Committee.

The Board and the Appointments, Remuneration and Corporate Governance Committee have promoted a very significant female presence in the composition of the different committees of the Board: 100% in the Audit, Risk and Compliance Committee; 80% in the Sustainability Committee; 50% in the Appointments, Remuneration and Corporate Governance Committee and 25% in the Delegate Committee (which, following the incorporation of Pilar Gil in February 2023, has increased to 33.33%). In addition, all the committees (except the Delegate Committee, which, by mandate of the Regulations of the Board of Directors, must be chaired by the Chair of the Board) are chaired by women, and the functions of coordinating director are also assumed by a woman. These figures denote the commitment of the Board of Directors to gender diversity.

It should also be noted that, in February 2022, the Board of Directors agreed to set up a Sustainability Committee (made up mostly of women), and it has also reorganised the composition of the Audit, Risk and Compliance Committee (made up entirely of women).

The Annual Corporate Governance Report details the results of the analysis carried out by the Appointments, Remuneration and Corporate Governance Committee and explains how in 2022 the opportunity to incorporate more women on the Board did not arise. In 2022, no selection process was launched to incorporate new female directors, so there was no opportunity to increase the female presence on the Board during this year.

It has not been easy to make progress in this respect because this depends on multiple factors that are not always under the Board of Directors' control. Men must be replaced by women on the Board in an orderly, gradual manner, at the moment when a renewal of the Board is applicable. In this regard, it must be taken into account that the diversity policies and objectives must be implemented within the framework determined by the composition of the Board at a given moment.



It is to be noted that each time the Board of Directors has made a decision regarding its structure or composition in 2022, it has done so with the support and prior advice of the Appointments, Remuneration and Corporate Governance Committee, taking into account the Board's matrix of responsibilities and carrying out an analysis of the Board's needs and required responsibilities. Both the Board of Directors and the Appointments, Remuneration and Corporate Governance Committee endeavour to avoid discrimination in the selection or re-election of directors and executives, and to ensure that, for the purposes of corporate interest, merit prevails as the main criterion, always striving to have the best professionals, while applying measures to promote gender diversity.

Attention is also called to the actions carried out to reinforce the presence of women in top management positions in the organisation. The Company's group of senior managers (at the end of 2022 and currently) comprises 5 women and 4 men. Therefore, the female presence in this group is 55.55%.

For the reasons given above regarding gender diversity, a constant effort has been made to achieve high levels of female representation in the Company's management bodies.

The Appointments, Remuneration and Corporate Governance Committee and the Board have highlighted the need to continue making progress on gender diversity and will promote the presence of qualified women both on the Board of Directors and its Committees as well as in management and positions of responsibility in the Company.

5.3.2. RISK MANAGEMENT

5.3.2.1. Scope of application

PRISA's Risk Control and Management Policy, in force since November 2020 and approved at the beginning of 2023, establishes the reference framework for the control and management of the risks associated with its activity. Its exclusive objective is to establish the basic principles for control and management of both the financial and non-financial risks faced by the Company and the Group.

The Policy is embodied in a risk control and management system, designed to identify, evaluate and manage the financial and non-financial risks that the Company faces, including, among financial or economic risks, contingent liabilities and other off-balance sheet risks, with the ultimate goal of providing reasonable security in the achievement of the PRISA Group's objectives.

This Policy is applicable to all the companies that make up the Group, as well as to investee companies that are not part of the Group over which the Company has effective control.



5.3.2.2 Risk control and management systems

The Group has a Risk Management System, supported by appropriate definition and assignment of functions and responsibilities at different levels and a series of control and management methodologies, tools and procedures. Through this Risk Management System, the Group identifies, monitors and analyses risks; and it defines and, where appropriate, executes, on a case-by-case basis, the necessary measures to mitigate the risks when they materialise.

PRISA has a global risk map, as well as specific non-financial risk maps, including ESG risks, and the risks associated with the criminal compliance model, which are generally reviewed annually. These are used to identify and assess the risks of the activities of the businesses and of the Group.

The Internal Audit Department aggregates and standardises the risks identified by each business unit in order to draw up the Group and business risk maps. The Risk Control Department consolidates the action plans and the teams responsible for them, as identified for each risk by the business unit. Thus, it integrates risk management into the business strategy, and promotes achievement of strategic objectives focused on the creation and protection of value for the Group. All of this allows the company to draw conclusions about the impact/probability of each risk in the estimated scenario.

This Risk Management System operates by business unit, consolidating this management at the corporate level through a comprehensive management model, among other specific tools, focused on ad hoc analyses of the different risks, depending on their development and the assessment made of them and their circumstances over time. Risks are pinpointed by the CEOs of the business units and the Group, identifying the parties responsible for managing each risk and setting action plans and controls.

In this respect, the business units contribute to the proper functioning of the risk control and management systems and, in particular, aim to identify, manage and adequately quantify the risks affecting them, together with the associated action plans. Consequently, they also actively participate in defining the risk strategy and in risk management decisions, ensuring that the systems in place adequately mitigate risks within the framework of the policy defined by the Board of Directors and the Audit, Risk and Compliance Committee.

Within the framework of the comprehensive management model, the risk maps, together with their action plans and the conclusions on the impact/probability of each risk in the estimated scenario, are reported to the Audit, Risk and Compliance Committee. The Committee also supervises and regularly assesses the Group's risk control and management systems, as well as proposing to the Board of Directors a level of risk considered acceptable, in view of the risk aversion, risk tolerance or risk appetite in each specific case.

PRISA also has an Internal Control over Financial Reporting System (ICFR), based on the COSO 2013 methodological framework. It has a Crime Prevention and Detection Model in Spain for criminal risk management and it develops regulatory compliance models in the main countries in which it operates (Brazil, Mexico, Argentina and Colombia). Compliance models cover environmental, labour relations and corruption and bribery risks for each business activity.



Relevant risks monitored.

The activities of the Group businesses and, therefore, also appropriate execution of its strategic roadmap, are subject to risks that can be grouped into the following categories:

- a. Risks relating to the financial condition and equity situation.
- b. Strategic and operational risks².
- c. ESG risks.
- d. Criminal compliance risks.
- e. Reputational risks.

Reputational risks are risks associated with a potential negative impact on the Group and its results, as a consequence of behaviour that does not meet the expectations of the market and the various stakeholders, including conduct related to corruption and lack of integrity as defined in the Group's Anti-Corruption Policy. Non-financial risks are classified according to categories aligned with the areas described in Law 11/2018 on non-financial information and diversity.

Criminal compliance risks are risks associated with the committing of crimes defined in the Penal Code as chargeable against a legal person. Some business activities exist in which a crime could be committed by one of the Group's employees. In this context, to minimise such risks, which include corruption, bribery, money laundering, workplace harassment, violation of privacy, compliance models are established and regularly reviewed for their continuous improvement.

The ESG risks are summarised below, and each chapter of the report provides further information on the indicators for monitoring and evaluating such risks. The table at the end of this report shows how the information is linked to the GRI Standards indicators.

ESG risks identified					
Category	Definition	Main risks	Indicators		
Environmental management	Includes risks associated with the Group activity's exposure to climate change	Of sustainable and responsible supply of raw materials. Related to emissions to the atmosphere	% of paper purchased from sustainable sources Scope 1, 2 and 3 emissions		
		Of waste generation and circular economy	Paper from renewable or recycled sources		
Governance, corporate and	Includes risks associated with lack of transparency, non-compliance	In the capacity for attracting and retaining talent	Involuntary turnover rate		
personnel	S	In promoting equality	% of workforce covered by equality plans		
management standards, and risks related to talent and diversity		Work-life balance	% of employees covered by work disconnection		

¹ Details of the risks related to the financial condition and equity situation can be found in note 3 of the *consolidated management report*.

² Details of strategic and operational risks can be found in note 3 of the consolidated management report.



ESG risks identified				
Category	Category Definition		Indicators	
			policies	
	Includes cybersecurity and	Of affecting consumers	No. of claims and complaints received	
Company privacy risks, and risk of impact on consumers, users, listeners and readers		Of cybersecurity and privacy of information (own staff, consumers and supply chain).	Risk events of leakage of private information	
Supply chain	Refers to the risk of ties to third parties	Of ties to third parties without a standard-approval process	% of payments to suppliers not approved and not subscribed to the Code of Ethics for Suppliers	

The company is working on an update of the Non-Financial Risk Map that will be approved by the Sustainability Committee during the year 2023.

5.3.3. PROTECTION OF PRIVACY AND DATA SECURITY

Personal data is a valuable asset, so it is essential to have cybersecurity measures to contain attacks that attempt to obtain this information, avoiding security breaches.

Since the General Data Protection Regulation (GDPR) came into force in 2018, PRISA has worked intensively to improve and develop its personal data and consumer rights control and assurance processes against potential uses that may be made of them. This regulatory development has also had an impact on Group companies in Latin America, which have been reviewing their procedures for compliance with local data protection regulations.

The Data Protection Officer (DPO) is responsible for receiving and managing, in the first instance, claims and inquiries from users and people whose personal data is processed by the Group's companies. They can do so via the mailbox dpo@prisa.com or by writing to a postal address provided for the purpose. Prisa Media has a specific email box: privacidad@prisa.com.

In 2022, the Prisa Media business unit received 9 complaints from users and 3 from the Spanish Data Protection Agency (5 in 2021), related to the exercise of data protection rights or the processing of personal data. All of the above claims have been appropriately managed. Santillana did not receive any claims related to privacy.

As part of PRISA Group's commitment to privacy management, correct processing of personal data and improving information security protection, the Group has been carrying out the following actions:

The Group's Privacy Policy was defined with the purpose of Management declaring its
highest commitment to personal data protection, guaranteeing regulatory compliance,
and contributing to the development of an ethical culture and integrity in the businesses.



- Santillana drew up the Corporate Regulations for the Protection of Personal Data to provide a standard of principles and obligations in the protection of personal data common to all companies in the countries in which operates.
- Since 2019, PRISA Group has had a Security Master Plan in place with the objective of generating continuous improvement in the level of maturity of cybersecurity risk management in all of the Group's operations. The level of maturity is measured using the ISO/IEC 27002:2013 control standard.
- The Security Master Plan covered the years 2020-2022 and included an inventory of around 50 initiatives for improving the management of cybersecurity, which have been implemented over these years.
- One of the pillars of this Security Master Plan has been to provide the Group with a Body of Security Regulations, which is currently composed of 1 Policy, 17 Rules and 14 Standards, Guides, Procedures and Recommendations.
- During this period, periodic evaluations of the level of maturity of the plan were carried out: June 2019 (initial evaluation); December 2019; December 2020; December 2021; December 2022 (final evaluation, external auditor). The result of the final evaluation carried out in December 2022 reflects an improvement of 104.49% in the level of maturity of security management in the PRISA Group (measured according to the criteria defined in the ISO/IEC 27002:2013 framework).
 - In December 2022 the process of renewing the Security Master Plan began, with the idea of extending it to the period 2023-2025. As an initial step, the Logical Security Office service was renewed, using a new supplier. A start was also made on the review process of initiatives included within the plan and their adaptation to the latest version of the reference standard, ISO/IEC 27002:2022.

5.3.4. COMPLIANCE AND BUSINESS ETHICS

The PRISA Group is committed to compliance with the law and with its Code of Ethics, in all the markets and territories where it operates. The objectives of the legal compliance model, based on the Code of Ethics, include promoting ethical behaviour in employees when carrying out the company's activity.

PRISA's Code of Ethics3 includes the set of ethical principles and rules of conduct that Group companies and their employees must apply. The general ethical principles refer to respect for human rights and public freedoms, professional development, equal opportunities, non-discrimination, and respect for people, health, and safety at work and environmental protection.

The Code of Ethics is published in Spanish and English on the PRISA corporate website (www.prisa.com) and forms part of the welcome pack given to all new employees.

In 2022, to promote an ethical corporate culture, with the key support of HR, work was carried out on a responsible leadership project as a technical tool for changing behaviour through training and raising awareness. A decalogue was defined with the characteristics of PRISA leaders so that, leading by example, they can help to promote an ethical culture. The project has been approved by the Appointments, Remuneration and Corporate Governance Committee.

18

³ It is referred to in paragraph F.1.2 of the Annual Corporate Governance Report.



The Code of Ethics and various policies that are developed from it constitute an essential element of the *compliance* model and establish the guidelines on how the Group and its members should act in different contexts. In 2022, the Zero Standard for making rules was created. It sets the criteria for the production and approval of rules, using a common nomenclature and setting deadlines for updating. Numerous policies and procedures have been revised and updated, including, of relevance to this section, the Anti-Corruption Policy, the Competition Policy and the Gift Policy. A new Data Protection Policy and a Code of Ethics and Conduct applicable to the company's suppliers have also been approved. In terms of conflicts of interest, the Rules of Procedure of the Board of Directors, the company's Code of Ethics and the Internal Regulations of Conduct in matters relating to stock markets establish the general principles of action to be observed when appropriate.

In 2022, the new "PRISANET" intranet was launched for the Company, Prisa Media and all its subsidiaries in Spain. All the rules applicable to its employees are published in it. To facilitate access to them, a distinction is made between general and specific rules. The first of these should be known by all employees.

The *Chief Compliance Officer* (CCO), as the head of the regulatory compliance function in the Group, with autonomous powers of initiative and control, assumes the functions of the criminal prevention body provided for in the Penal Code and, among other functions, is responsible for ensuring and promoting the ethical behaviour of the Group's employees and for identifying, managing and mitigating compliance risks4. The CCO reports directly to the Audit, Risks and Compliance Committee.

In 2022, the compliance units of the parent companies of the Group's businesses were changed to a single-person function with a *Chief Compliance Officer*. This change was also made in PRISA in 2021 in order to strengthen the compliance function and to increase coordination of common compliance objectives between PRISA and its subsidiaries.

The most significant business unit subsidiaries (Brazil, Mexico, Colombia, Argentina, and Chile) have established collegial body compliance units or have designated a compliance officer. PRISA has a whistle-blowing channel5, accessible on the corporate website (www.prisa.com), on the intranet, and via a post office box in Madrid, through which any person, anonymously and confidentially, can report any irregularity or breach of both external and internal regulations.

The complaints handling procedure specifies how to communicate irregularities, guarantees that there will be no retaliation against whistleblowers who report alleged non-compliance or irregularities in good faith, describes the process of investigation, resolution, the application of sanctions (if applicable) and the communication, where appropriate, of decisions taken. The whistleblowing channel is managed by the CCO.

 $^{{\}small 4\ Described\ in\ paragraph\ F.1.2\ of\ the\ Annual\ Corporate\ Governance\ Report}$

⁵ Described in paragraph F.1.2 of the Annual Corporate Governance Report



PRISA employees can send queries related to the Code of Ethics and other internal regulatory, ethics and compliance matters to the compliance mailbox (cumplimiento@prisa.com) managed by the CCO. Similar mailboxes associated with each business's Compliance Unit (CU) redirect to the Group's compliance mailbox. A procedure similar to that for complaints received through the whistleblower channel is followed when processing complaints received through these mailboxes.

In 2022, 37 complaints were received, 13 more than managed in 2021 (24). Of these, 11 were justified, 2 are under investigation (from which no significant consequences are expected) and 24 were unfounded. In cases where complaints were founded, the disciplinary measures provided for in the corresponding legislation were applied, and controls were generally reviewed and strengthened to mitigate future risks.

It should be noted that no complaints or significant sanctions were made against PRISA in 2022 for non-compliance with the legislation or regulations in any of the markets where it operates.

5.3.4.1. Fight against corruption and bribery

The Code of Ethics contains the basic principles for internal control and prevention of corruption, governing aspects such as transparency, truthfulness and reliability of information and control of records, bribery and anti-corruption measures, prevention of money laundering and payment irregularities. The Code of Ethics online course, available to the entire workforce, promotes application of these principles and the necessary collaboration of all PRISA employees in preventing all forms of crime and inappropriate behaviour. On December 31, 2022, 2,800 employees out of a total of 7,222 had completed the course.

The 2021 Compliance Policy states PRISA's commitment to the function of regulatory compliance, which means not only complying strictly with applicable laws and internal regulations, but also promoting a culture of ethics and corporate integrity in the daily activity. It also reinforces its commitment to the company's purpose and the values, principles and standards of conduct promulgated in the Code of Ethics.

The Anti-Corruption Policy, reviewed and updated in July 2022, establishes PRISA's commitment to the fight against corruption in all its forms, in all its areas of action and in all the countries in which it operates. In September 2022, the procedure for the prevention of money laundering, applicable to all companies in the Group, was updated and approved to strengthen the measures to prevent the laundering of money from criminal or illegal activities.

The Investment and Financing Policy defines the applicable framework for the analysis, approval and control of investment or divestment projects and coverage of the financial, control and financial risk management needs of the businesses.

The Gifts Policy, updated and approved in July 2022 by the PRISA Board of Directors, gives guidance to employees and management bodies on making the right decisions regarding the acceptance and offering of gifts, services, or other hospitality, within the framework of the Group's commercial relations.



The Competition Policy, also updated and approved by the Board of Directors in July 2022, establishes PRISA's commitment to promoting free competition, avoiding conduct that constitutes or may constitute collusion, abuse, or restriction of free competition. Its compliance applies to companies, staff, and managers of the Group.

With the aim of using employee training and awareness raising to minimise the risks of corruption and bribery, an anti-corruption course was launched in 2022. It is available to all employees on the PRISA Campus training platform, which can be accessed through the intranet. As of December 31, 2022, 3,563 employees out of a total of 7,222 had completed the course..

The Crime Prevention and Detection Model is another of the pillars on which the compliance model is built, in line with the general organisational and management requirements set out in sections 2 and 5 of article 31 bis of the Spanish Criminal Code for Spanish subsidiaries. This model is subject to a continuous process of verification and updating to ensure its effectiveness and the correct functioning of the controls it establishes. Specifically to detect and prevent corruption and bribery, it is essential to have a matrix of crime risks and controls.

PRISA has another series of policies and procedures as additional measures for preventing bribery and fighting corruption. These include the procedure on how to act with public administrations, the procedure on granting restrictive powers of attorney, and the policy on travel and entertainment expenses.

In application of the protocol for action in cases of corruption, bribery or money laundering, the Whistleblower Channel and the compliance mailboxes are made available to employees and third parties.

The key indicator in PRISA for assessing the risk of corruption, in all its forms in both the public and private sectors, is the number of complaints received and substantiated each year via the Whistleblower Channel. Of the complaints received and investigated in 2022, six were related to cases of corruption. Three were founded: two cases of employee fraud for a non-material amount and a third related to a regulatory breach. In all three cases, various measures were taken to strengthen controls, and the disciplinary regime corresponding to the country's legislation was applied.

5.3.5. RESPECT FOR HUMAN RIGHTS

Respect for human rights is included in article 4 of the Group's Code of Ethics. In this article, PRISA commits to respecting and protecting human rights and civil liberties, building democracy and freedom of expression, preserving the natural environment, and contributing to the development and well-being of the communities with which it interacts. It also expresses its total rejection of child labour and forced or compulsory labour, and its commitment to respect freedom of association and collective bargaining.

In application of this commitment, Compliance applies its Crime Prevention and Detection Model to ensure the ethical behaviour of its employees, and monitors, disseminates and provides training in the Code of Ethics. The general purchasing conditions and the supplier approval procedure stipulate respect for human rights as a requirement for suppliers.



In October 2022, the Board of Directors approved the Suppliers' Code of Ethics and Conduct, with the aim of ensuring that suppliers respect and comply with its guidelines on applicable legislation, human rights, employment rights, business ethics, anti-corruption measures, the environment, and confidentiality and privacy. The Suppliers' Code of Ethics and Conduct is published on the corporate website in Spanish, English and Portuguese.

In the non-financial risk map, PRISA's indicator for monitoring respect for human rights is the number of complaints received and substantiated. Of the complaints received and managed in 2022, no complaint was classified in the Human Rights section. However, four complaints were made about alleged workplace or sexual harassment, which were not substantiated, and a fifth complaint, about inappropriate conduct in the work environment, was judged to be founded and the corresponding disciplinary regime was applied.

5.4. RESPONSIBLE MANAGEMENT

In carrying out its activity, the PRISA Group is aware of its potential social and environmental impact, and of its value chain's influential capacity. Consequently, PRISA works to protect the environment and to offer a work environment that is free of discrimination and secure and stimulating for the people in its teams, and it collaborates with its supply chain to protect human rights and promote the sustainability agenda.

5.4.1. OUR PEOPLE

5.4.1.1 Employment

At year-end 2022, there were 7,222 people in the PRISA workforce, an increase of 6% on the previous year. This growth is mainly due to the incorporation into the company's perimeter (since May) of LaCoproductora, a company that centralises all of Prisa Media's video content, and to the organic business growth in Colombia, Chile and Peru.

Total employees		2022		2021			
by BU	Men	Women	Total	Men	Women	Total	
Santillana	1,541	1,854	3,395	1,489	1,793	3,282	
Prisa Media	2,167	1,619	3,786	1,983	1,484	3,467	
Corporate	15	26	41	19	28	47	
Total	3,723	3,499	7,222	3,491	3,305	6,796	

Total employees by	20.	22	2021			
BU and gender (%)	Men	Women	Men	Women		
Santillana	45%	55%	45%	55%		
Prisa Media	57%	43%	57%	43%		
Corporate	37%	63%	40%	60%		
Total	52%	48%	51%	49%		



By gender, men represent 52% of the total workforce and women 48% (figures similar to those of 2021). The percentage increase in the number of male and female employees was practically the same as in the previous year: 7% and 6% respectively.

Total employees by	202	2	20:	21	21-22 annual variation (%)		
professional category	Men Women Men V		Women	Men	Women		
Senior Management	169	102	166	106	2%	-4%	
Middle management	541	403	558	429	-3%	-6%	
Technical staff	2,274	2,325	2,026	2,081	12%	12%	
Other staff	739	669	736	694	0.4%	-4%	
Total	3,723	3,499	3,486	3,310	7%	6%	

By professional category, women hold 42% of managerial and middle management positions, and men 58%.

Distribution of mosque		2022										
Distribution of people by category, age and gender (yearly average)	Age group 1 (< 30 years)		Age group 2 (30-50 years)		Age group 3 (> 50 years)		Total					
gender (yearry average)	Men	Women	Men	Women	Men	Women	Men	Women				
Executives	100%	0%	62%	38%	61%	39%	62%	38%				
Middle management	58%	42%	56%	44%	58%	42%	57%	43%				
Qualified technical staff	48%	52%	48%	52%	56%	44%	49%	51%				
Other	49%	51%	50%	50%	59%	41%	52%	48%				
Total	49%	51%	50%	50%	58%	42%	51%	49%				

At the same time, the composition of the workforce has been analysed by age, gender and business unit. Santillana has is a higher proportion of women than men in all age groups, unlike in Prisa Media, where the proportion of men is higher.

Distribution of	Year 2022									
people by BU, age and gender (%)	Age group 1	(< 30 years)	Age grou yea	p 2 (30-50 ars)	Age group 3 (> 50 years)					
0 ()	Men	Women	Men	Women	Men	Women				
Santillana	45%	55%	45%	55%	46%	54%				
Prisa Media	52%	48%	55%	45%	65%	35%				
Corporate	67%	33%	35%	65%	33%	67%				
Total	49%	51%	50%	50%	58%	42%				

Type of contract and working day

95% of PRISA's total staff have a permanent contract and 5% have a temporary contract (the same as in 2021). At year-end, 99% of the workforce was working full time, similar to 2021 when the percentage was at 98%.



Type of	2022												
Contract/Working	rking Temporary		Perm	anent	Part-ti	ime	Full-	Full-time					
Day by BU	Total	%	Total	0/0	Total	%	Total	%					
Santillana	155	5%	3,240	95%	11	0%	3,384	100%					
Prisa Media	222	6%	3,564	94%	88	2%	3,698	98%					
Corporate	0	0%	41	100%	4	10%	37	90%					
Total	377	5%	6,845	95%	103	1%	7,119	99%					

Towns of southern		2022											
Type of contract by age and gender	Age group 1 (< 30 years)		Age group year		Age grouj year		Total						
	Men	Women	Men	Women	Men	Women	Men	Women					
Temporary	47%	53%	49%	51%	53%	47%	49%	51%					
Permanent	50%	50%	50%	50%	58%	42%	52%	48%					
Total	49%	51%	50%	50 %	58%	42%	52%	48%					

Type of working		2022										
day by age and gender	A === ===== 1		Age group year		Age gro (> 50 y		Total					
0	Men	Women	Men	Women	Men	Women	Men	Women				
Part-time	60%	40%	34%	66%	50%	50%	40%	60%				
Full-time	49%	51%	50%	50%	58%	42%	52%	48%				
Total	49%	51%	50%	50%	58%	42%	52%	48%				

Type of contract by		202	22		2021				
category, with each	Permanent		Temporary		Permanent		Temporary		
category's % of the total	People	%	People	%	People %		People	%	
Manager	271	100%	0	0%	271	100%	1	0%	
Middle manager	936	99%	8	1%	978	99%	9	1%	
Qualified technical staff	4,314	94%	285	6%	3,960	96%	147	4%	
Other staff	1,324	94%	84	6%	1,367	96%	63	4%	
Total	6,845	95%	377	5%	6,576	97%	220	3%	

Type of working day by category, with each		202	22		2021				
	Full-time		Part-time		Full-time		Part-tin	ne	
category's % of the total	People	%	People	%	People	%	People	%	
Manager	271	100%	0	0%	272	100%	0	0%	
Middle manager	937	99%	7	1%	984	100%	3	0%	
Qualified technical staff	4,512	98%	87	2%	4,015	98%	92	2%	
Other staff	1,399	99%	9	1%	1,420	99%	10	1%	
Total	7,119	99%	103	1%	6,691	98%	105	2%	



Turnover rate

The voluntary turnover rate (measured as voluntary departures over average workforce in the year) is 11%, compared to 8% in 2021, while the involuntary turnover rate (dismissals) is 6%, compared to 10% in 2021 (measured as compensated departures over average workforce).

		2022		2021			
Voluntary turnover rate	Men	Women	Total	Men	Women	Total	
Group turnover rate	10%	12%	11%	7%	9%	8%	

Involuntary turnover rate		2022		2021			
involuntary turnover rate	Men	Women	Total	Men	Women	Total	
Group turnover rate	5%	7%	6%	10%	10%	10%	

By gender, 46% of voluntary departures from the Group were men and 54% women (stable percentages compared to 2021). 68% were workers aged between 30 and 50 years.

Distribution of voluntary departures by age and gender		2022					
as a percentage of total departures	Men	Women	Total	Men	Men Women		
Age group 1 (< 30 years)	10%	12%	22%	9%	14%	23%	
Age group 2 (30-50 years)	30%	38%	68%	31%	36%	67%	
Age group 3 (> 50 years)	6%	4%	10%	6%	4%	10%	
Total	46%	54%	100%	46%	54%	100%	

Distribution of voluntary departures by age group	202	2	20	21-22 annual variation	
	Total	%	Total	%	%
Age group 1 (< 30 years)	170	22%	126	23%	35%
Age group 2 (30-50 years)	517	68%	375	68%	38%
Age group 3 (> 50 years)	72	10%	54	10%	33%
Total	759	-	555	-	37%

Distribution of voluntary	20	22	2021		
departures by professional category	Total	%	Total	%	
Senior Management	12	2%	16	3%	
Middle management	67	9%	48	9%	
Technical staff	484	64%	344	62%	
Other staff	189	25%	148	27%	
Total	752	-	556	-	



The percentages of voluntary departures by professional category remain similar to those reported in the previous year.

Redundancies measured as departures with severance payments in the Group were 45% men and 55% women, and 66% were employees aged between 30 and 50 years.

By professional category, these departures are distributed according to the proportion of workers in each category, the resulting distribution being similar to the general distribution of the workforce. 16% were executives and middle management, while 84% were other employees.

By geography, 18% occurred in Spain, compared to 23% in 2021.

Distribution of involuntary departures (dismissals) by age group	202	22	20	21	21-22 annual variation	
(disinissais) by age group	Total	%	Total	%	%	
Age group 1 (< 30 years)	33	8%	48	7%	-31%	
Age group 2 (30-50 years)	284	66%	422	62%	-33%	
Age group 3 (> 50 years)	115	27%	206	31%	-44%	
Total	432	-	676	-	-36%	

Distribution of involuntary		2022				
departures (dismissals) by professional category	Men	Women	Total	Men	Women	Total
Senior Management	11	9	20	29	10	39
Middle management	23	24	47	48	52	100
Technical staff	129	162	291	205	212	417
Other staff	31	43	74	58	63	121
Total	194	238	432	340	337	677

Distribution of involuntary departures (dismissals) by geography	202	2	202	21	21-22 annual variation
(dishlissals) by geography	Total	%	Total	%	%
Spain	76	18%	157	23%	<i>-</i> 51%
Rest	356	82%	520	77%	-32%
Total	432	-	677	-	-36%

5.4.1.2. Social relations

There is freedom of association in all PRISA Group companies and social dialogue is fostered. The collective bargaining agreements currently in effect involve improvements in employment and working conditions in relation to the minimum rights required by legislation. In general, information, representation and consultation procedures for employees are contained and regulated in the different collective bargaining agreements and are structured through the labour representation bodies regulated in the same.



Overall, 63% of the Group's workers are subject to collective bargaining agreements, Prisa Media being the Business Unit with the highest coverage of 87%.

In 2022 there were no labour force adjustment plans (EREs), furlough schemes (ERTEs) or strikes within the Group. There have been no claims for breach of working conditions or rights applicable to the workforce.

In Santillana, the percentage is lower due to the geographic dispersion of its business and the lack of such strict application of this regulatory employment body in the countries in which it operates. This does not undermine the social dialogue existing in its companies, always under an applicable regulatory umbrella that guarantees social relations between a company and its workers.

Employees covered by a collective bargaining agreement	No. of employees covered by the collective bargaining agreement	% of employees covered
Corporate	31	76%
Santillana	1,211	34%
Prisa Media	3,276	87%
PRISA Group	4,518	63%

5.4.1.3. Work-life balance and flexible working arrangements

In Spain, the staff get company perks, life and accident insurance, cover for disability or invalidity and maternity or paternity bonuses. In general terms, companies in the Group do not distinguish between full-time and part-time, or permanent and temporary contracts, for accessing these company benefits.

The Group promotes disconnecting from work in all its companies. In Spain, a time at work control system is gradually being implemented to optimise the management of time worked, with a commitment to flexible working arrangements in a collaborative environment for the benefit of employees. Also in Spain, the Group has a digital disconnection policy for Santillana and a separate policy for Prisa Media.

In addition, this policy is being adapted for each medium as part of the process of renegotiating collective bargaining agreements.

In practice, all of the collective agreements applicable to the various companies in Spain have working hours below the maximum legal working hours (40 hours per week).

Furthermore, any exceptional overtime will be compensated with days off, in accordance with the provisions of some of the agreements in companies that carry out their activity in Spain.



The distribution of the working day, both in Spain and in Latin America (where the concept of the short intensive working day does not exist), includes flexible starting and finishing times, and working hours are adapted and there are intensive working hours at certain times of the year (summer, Christmas and Easter). These exceptional working hours are established by agreement between the different departments and/or the workers' legal representatives.

Through a whole range of employment conditions, the Group tries to improve the legal minimums and to offer flexible arrangements for the employee's working life, helping to attract talent and reduce the rate of absenteeism, which in 2022 stood at 1.92%.

Work absenteeism		2022	2022 2021				
rate	Men	Women	Total	Men	Women	Total	
Spain	2.77%	3.62%	3.15%	1.51%	2.58%	2.00%	
Latam	0.67%	2.01%	1.35%	0.88%	1.65%	1.27%	
Total	1.39%	2.48%	1.92%	1.07%	1.89%	1.47%	

^{*} Absenteeism rate: (Total no. of absenteeism hours / Total no. of planned hours worked) x 1,000.

The commitment to guarantee the work-life balance is applicable to all companies and to all employees who work in the PRISA Group. It is worth noting some of the measures applied in Santillana in Spain to facilitate the work-life balance:

- Up to a maximum of 10 additional days off for any person on the workforce to deal with any situation that so requires.
- Reduction of the working day without the requirement of being a carer. A reduction in the working day, by a minimum of one eighth and a maximum of half of the working day's duration, is allowed.
- Special voluntary leave of absence, with a guaranteed return to the same job position, for a minimum period of 2 months and a maximum of 12 months.
- Leave to carry out training activities related to the job performed.
- Paid leave to accompany minors, dependents and family members up to second degree on medical appointments.
- Recoverable and paid leave to deal with exceptional family situations.

Santillana has also signed a teleworking agreement with the Workers' Legal Representation to facilitate work-life balance by extending the allowed days of teleworking per week to two. In the case of Corporate Headquarters, the number of days with the option to telework is higher.

5.4.1.4. Talent management and development

The training given in the Group is managed each year according to the budgets approved in each company. Each business manages the budget and training actions, focusing on the groups which are considered strategic, areas which require development, or updating to meet new needs or legal/regulatory requirements.



PRISA has its own online training platform for its staff. Employees of the different Group companies have a wide range of training activities available to them on PRISA Campus. In Spain, through the Flexible Remuneration Plan, employees have the possibility of contracting training related to their work activity or to learning English and/or Portuguese. This type of training is not considered as remuneration in kind and is therefore exempt from taxation.

In Santillana and Prisa Media in Latam, the above resources are in addition to a full training package managed in the countries and the corporate headquarters, with a great effort being made in post-COVID year 2022 to train the workforce in order to improve their employability. The Work-Life Balance Plan for Santillana Spain includes the possibility for all workers to request 3 to 9 months' unpaid leave to take a training course related to their job.

During 2022, PRISA Group staff have completed 65,259 hours of training, an increase of 58% on 2021 (41,267 hours in 2021). 69% of the hours were imparted in Santillana and 31% in Prisa Media and Prisa Headquarters.

Hours of training	2022	2021
Santillana	45,111	31,170
Prisa Media	19,305	9,950
Corporate	843	147
Total	65,259	41,267

The ratio of training hours per employee at Group level is 9 hours, calculated as the number of hours during the year divided by the number of employees at the end of the year. In the case of Santillana, the ratio is 13 hours, compared to 5 hours/employee for Prisa Media and 21 for Corporate Headquarters.

		No. of training hours by job category and gender													
	Senior Management					ent	Quali	fied tec staff	hnical	O	ther sta	ff		Total	
	M	W	Total	M	W	Total	M	W	Total	M	W	Total	M	W	Total
Corporate	146	198	344	75	161	236	138	121	259	0	4	4	359	484	843
Santillana	1,147	1,414	2,561	4,078	5,992	10,070	11,672	18,826	30,498	936	1,046	1,982	17,833	27,278	45,111
Media	393	377	770	1,491	557	2,048	2,122	3,326	5,448	4,999	6,040	11,039	9,005	10,300	19,305
Total	1,686	1,989	3,675	5,644	6,710	12,355	13,932	22,272	36,205	5,935	7,090	13,025	27,197	38,062	65,259

With regard to the distribution of training hours according to the responsibility of the people employed, 6% of the training hours have been invested in management staff (compared to 5% in 2021), 19% in middle management (compared to 24% in 2021) and 75% in other staff (compared to 80% in 2021).

As for the distribution of training hours by territory, 16% of training hours have been invested in Spain (17% in 2021) and the remaining 84% in the rest of the geographical areas where the Group operates (83% in 2021).



5.4.1.5. Diversity and equality

PRISA is a Group made up of a workforce with a great diversity of locations (23 countries) and nationalities (32 in 2022).

As commented in the "Quality Employment" section of this report, women represent 48% of the people working in PRISA (figures similar to those of 2021).

By professional category, women hold 42% of all managerial and middle management positions in the Group. By country, there is a majority female representation in Argentina, Brazil and Mexico.

		2022			2021	
Distribution of people by country	Men	Women	Total	Men	Women	Total
Argentina	74	174	248	75	182	257
Bolivia	20	9	29	18	13	31
Brazil	424	588	1,012	426	577	1,003
NCA (*)	77	61	138	74	63	137
Chile	244	166	410	221	166	387
Colombia	761	604	1,365	744	554	1,298
SCA (**)	43	48	91	40	42	82
Ecuador	69	52	121	66	44	110
Spain	1,467	1,183	2,650	1,296	1,084	2,380
Mexico	333	396	729	329	384	713
Puerto Rico	11	13	24	13	11	24
Paraguay	12	16	28	10	15	25
Peru	105	122	227	84	100	184
Portugal	4	5	9	4	5	9
Dom. Rep.	60	36	96	61	38	99
Uruguay	8	15	23	9	14	23
USA	6	5	11	16	8	24
Venezuela	5	6	11	5	5	10
TOTAL	3,723	3,499	7,222	3,491	3,305	6,796

^{*} North Central America (includes Guatemala, Honduras and El Salvador)

Diversity and non-discrimination are part of the corporate culture, and both are safeguarded by the company's Code of Ethics and Conduct and in its commitment to ensure fair and equal processes of recruitment, hiring and career development. This means that Group promotes equal opportunities in access to employment, training, and promotion for its employees, and prohibits discrimination based on their personal, physical or social status, whether for reasons of race, colour, nationality, social origins, age, sex, sexual orientation, civil status, ideology or religion.

With regard to gender equality, the collective bargaining agreements applicable to the various companies in Spain contain specific sections on equal treatment and opportunities for men and women, protocols for action in the event of harassment and other measures to drive equality in all areas.

^{**}South Central America (including Costa Rica and Panama)



The Group has a prevention and action protocol for dealing with situations of sexual, moral or employment harassment, designed to regulate fully all aspects directly related to any situation of harassment. The Whistleblower Channel is a tool for communicating potentially irregular conduct easily and confidentially.

In the Prisa Radio agreement there is a section headed "Prisa Radio Group's Equality Plan", which sets out measures to promote equal treatment and opportunities between men and women in terms of recruitment, promotion and career development, training, and work-life balance. The collective agreement for Ediciones El País also contains a section headed "Equality and Work-Life Balance Plan", which serves, among others, the goals of achieving a balanced representation of women in the business and access for women to management positions.

In 2020 Santillana signed the Equality Plan 2020-2024 applicable to its employees in Spain. Following the corporate changes brought about by the merger of the Media business units, work is underway to draw up equality plans, with good progress being made in the negotiation of collective bargaining agreements, job descriptions and the development of the diagnosis of the business units.

The Group also has a procedure for reporting and dealing with psychosocial harm to employees in the area of harassment. In addition, in 2021 Media España presented a protocol against sexual and workplace harassment to the Legal Representation of Workers, which applies to all companies.

The total average remuneration, considering all job categories, is EUR 31 thousand. The average for men is EUR 34 thousand (10% above the average) and for women EUR 27 thousand (11% below the average.

A			2022			21-22
Average remuneration	Average remuneration	Men	Women	TOTAL	2021	annual variation (%)
	Senior Management	146,705	98,217	128,455	121,830	5.4%
Cataman	Middle management	55,383	43,773	50,426	49,882	1.1%
Category	Technical staff	27,816	25,715	26,754	24,821	7.8%
	Other staff	11,873	12,862	12,343	12,304	0.3%
	Age group 1 (< 30 years)	13,984	14,971	14,485	11,627	2.6%
Age	Age group 2 (30-50 years)	31,703	27,022	29,360	27,828	5.5%
	Age group 3 (> 50 years)	50,693	38,209	45,419	44,333	2.4%
Sex	Men	N/	Λ	34,054	32,889	3.5%
Jex	Women	IN/	Λ	27,451	26,373	4.1%

In 2022, continuing with the criterion followed in 2021, the PRISA Group has measured pay inequality using the guide provided by the *Instituto de las Mujeres*.



	2021			2022			
Wage gap Men (euros)		Women	Wage inequality	O Men		Wage inequality	
Senior Management	139,712	94,683	3.23%	146,705	98,217	33.05%	
Middle	107/112	71,000	0.20 70	110,700	50,217	33.00 70	
management	54,214	44,454	18.00%	55,383	43,773	20.96%	
Technical staff	26,000	23,721	8.77%	27,816	25,715	7.55%	
Other staff	11,814	12,858	-8.84%	11,873	12,862	-8.33%	
Total Grup	32,889	26,373	19.81%	34,054	27,451	19.39%	

The trend reflected in 2022 is similar to that in 2021. According to Eurostat, the pay gap between men and women in the EU has narrowed from 14.1% in 2019 to 12.9% in 2020 (latest published figures).

Regarding the inclusion of disabled people in employment, in Spain PRISA has partnership agreements with special employment centres for the provision of certain services (mainly cleaning), and other cooperation mechanisms under Spanish law (donations to special employment centres). In 2022 the Group hired 36 people with disabilities equal to or greater than 33% (26 people in 2021). 56% of them work in Spain, 22% in Brazil and 17% in Ecuador. By gender, 23 are men and 13 women.

	2022	2021
Spain	20	13
ROW	16	13
Total	36	26

5.4.1.6. Health and wellbeing

The Occupational Risk Prevention department in Spain, within the Human Resources area, is responsible for identifying psychosocial risk factors that may affect employee health. In Latin America, there are health and safety committees in several countries.

To promote the health and wellbeing of employees, Prisa Media in Spain has a corporate communication tool for the workforce, which is called *Comunica*. Throughout 2022 the *Comunica* tool's content has typically comprised recommendations on health prevention, news about the Group's activities, online training pills, conferences on emotional support and resilience, activities to promote work-life balance and digital disconnection, plus the dissemination of projects with a high level of employee participation.

	Total no. of accidents at work resulting in sick leave						
	2022			2021			21-22 annual
	Men	Women	Total	Men	Women	Total	variation (%)
Santillana	6	6	12	3	2	5	140%
Prisa Media	7	2	9	3	6	9	0%
Corporate	0	0	0	0	0	0	0%
Total	13	8	21	6	8	14	50%



In 2022, 21 occupational accidents were recorded across the Group (13 men and 8 women), 50% more than the total in 2021 (14). The key measurement indexes for health and safety are:

	20	22	2021		
	Severity Index	Frequency index	Severity Index	Frequency index	
Men	0.02	1.88	0.08	0.99	
Women	0.02	1.21	0.07	1.19	
Total	0.02	1.56	0.07	1.09	

Severity Index: (No. days missed/No. hours worked) x 1,000

Frequency Index: (Total no. of accidents with leave/Total no. of hours worked) x 1,000,000

There have been no occupational diseases during the year 2022.

In the area of accessibility to work centres, the Group has adapted its facilities in accordance with the applicable regulations. There have been no accessibility disputes or complaint mechanisms for lack of accessibility at workplaces.

5.4.2. THE ENVIRONMENT

5.4.2.1. Environmental commitment

Despite the fact that the sector in which the Group operates (media/audio-visual and education) has a low environmental impact, in PRISA's Code of Ethics and its Sustainability Master Plan 2022-2025 the Group makes a clear commitment to proper environmental management, efficient use of natural resources and adequate protection of the environment in which it operates, in order to minimise negative environmental impacts.

Although it is true that the progressive transformation of the business model and its activity towards the generation of content and distribution on digital platforms mean that its environmental impact is reduced compared to other sectors, the Group actively promotes protection of the environment and awareness raising and dissemination of good environmental practices in the content it creates and distributes and in its daily management. In 2021, the company's Environmental Policy was approved, establishing the following principles:

- Protect the environment, with the commitment to reduce the carbon footprint, make sustainable use of resources and prevent and manage the waste generated by the PRISA Group's activity, complying with the standards established in the applicable environmental regulations.
- Contribute actively to raising awareness about the effects of climate change, promoting
 respect for nature and the protection of biodiversity, making use of the Group's digital
 audiences.
- Identify and continuously evaluate PRISA's environmental impacts in order to manage appropriately the risks caused, improve their mitigation or eradication, and promote the use of sustainable technology, transforming *legacy* businesses into digital businesses.



- Promote best practices in responsible management and incorporate environmental sustainability criteria in investment decision-making, as well as in the supply chain and in the execution of the Group's business.
- Disseminate these essential principles among all staff and stakeholders, while
 promoting the environmental commitment as a participatory task and a priority issue
 among the editorial topics; and sharing regularly and transparently the environmental
 results and actions carried out.

In 2022, the Group continued its work of dissemination and awareness raising among its employees, through the channels of "Comunica", in Prisa Media, and the "Santillana al día" daily bulletin, with topics such as "Children and the environment", "Control your digital footprint", "Responsible mobility" and "Chemicals and cleaning".

In 2022, the Group materialised its commitment to the environment with concrete actions:

- Inclusion of environmental and sustainability criteria in the approval of projects and award processes in corporate negotiations, especially in Spain and in process in Latin America.
- Reclassification of the calculation of scope 1 carbon footprint emissions to include emissions from the company's leasing vehicles, and of scope 3 to include vehicles not owned by PRISA Group, as well as the emissions generated by radio signal carriers, thus completing the data on emissions from transport and distribution of publications in Spain. The emissions generated in the printing of publications in Spain (News) are also included, and the Group has begun to measure the footprint generated by goods and services contracted from technology providers (which, due to the transformation of the business model, have an increasingly significant weight in the Group's operation).
- Since May, the EP, AS and 5D newspapers include a label to share with our readers that the product they are reading is "Printed on paper of sustainable origin".
- Since February, the size of the AS publication on paper has been reduced to optimise the consumption of materials which represents a c.6% of saving.
- Implementation of specific measures in both business units for waste prevention and waste recycling by certified companies.
- New Compartir, UNOi, Educa and Richmond education projects printed 100% on sugarcane paper renewable, recyclable and biodegradable in Santillana Colombia.
- In 2022, with the aim of raising awareness among students, teachers and schools about the life cycle of books and sustainability in education, Santillana has prepared an infographic for inclusion in educational materials as of the 2023 campaign.

In accordance with the roadmap established in the Sustainability Master Plan, in 2023, PRISA will begin an ambitious project focused on designing and implementing an environmental management system, aligned with the Environmental Policy and the Group's commitment to the fight against climate change. This project will provide an environmental diagnosis in all the countries where the company operates and will allow a roadmap towards climate neutrality to be made. The results of this work will be reported in the Non-Financial Information Statement for the next fiscal year.



5.4.2.2. Preventive measures

In addition to disseminating the Environmental Policy and raising environmental awareness internally and externally, the Group follows the precautionary principle. Thus, in addition to its policy in this area, it has guarantees in its insurance programme in different countries to cover potential accidental and sudden polluting impacts that could be generated by its operations.

Thus, in line with corporate policies, the Group selects and maintains commercial relations with suppliers that ensure and promote responsible and sustainable environmental management, both in the purchase of materials directly linked to the publishing business, such as paper, and in the other areas for which services are contracted in the Group's companies. In all countries where the Group operates, special attention is paid to managing the collection, reuse and recycling of waste, for which there are authorised managers.

In order to make further progress in preventive measures, the request for information on the degree of commitment of the various bidding companies in the negotiation specifications for the provision of services by third parties, as well as their operational management and relationship with the contribution to the United Nations 2030 Agenda, is maintained.

5.4.2.3. Circular economy and waste management

One of PRISA Group's main environmental objectives is to promote the circular economy and properly manage waste. Consequently, prevention, recycling and other forms of waste recovery and disposal are constantly promoted.

For example, it implements operational and awareness-raising measures aimed at the workforce to reduce waste generation and incorporates improvements in waste segregation to ensure its correct recovery.

The business units promote the appropriate management of the waste generated, in line with the Group's environmental management. Waste has been managed and subsequently destroyed with approved suppliers, in particular confidential documentation, selective waste such as wood or scrap and WEEE (waste electrical and electronic equipment).

At Prisa Media, office waste is recycled via third parties, such as the municipal service of Madrid City Council, and the supplier to which the printer leasing service is outsourced, which recovers the toner cartridges.

At Santillana, the waste generated in offices and warehouses in all countries is also managed via third parties. For example, in Brazil, a specialised company collects non-recyclable waste for treatment in an authorized landfill, and the recyclables are subsequently collected by a family cooperative in charge of their separation and sale. In Mexico, the company has contracted HP's MPS service (managed printing services), whereby the empty toner cartridges are collected and reprocessed to be used again by Santillana or other customers.



Paper and cardboard recycling

PRISA Group promotes recycling actions, mainly of paper and cardboard, which are the most consumed raw materials due to the type of business and activity carried out.

In Santillana, in 2022, 77.5 tons of paper and cardboard from its offices and warehouses were sent for recycling, and 1,346.8 tons of obsolete, surplus, or discontinued books were given to third parties for recycling or sustainable management. It is also important to note the company's effort to adjust print runs in order to reduce warehouse *stock* as much as possible.

In Brazil, reuse of wooden pallets, wooden lids, cardboard sheets and cardboard corners in the National Book and Teaching Materials Programme (PNLD) has reached 91%. In Colombia, the waste generated in the different areas is sorted as paper, cardboard and plastic and delivered to a company in charge of its final disposal, in compliance with the country's environmental measures.

In the Prisa Media offices, 77 tons of paper was recycled by contracting of 782 hours of work from the OMEN company, which employs people at risk of social exclusion to do the work, and 7.58 tons of paper was recycled through confidential destruction. 281 tons of paper from promotional copies was also recycled.

Recycling of other waste

In PRISA Group, most of the waste from electrical and electronic equipment (WEEE) following the replacement of computer equipment is recycled.

An example of the above are the 4 tons of recycled WEEE in Santillana Brasil or the 1.1 tons in Santillana México. The Group also recycled 3.42 tons of plastics.

At Prisa Media, following renovation of one of its data processing centres and computer equipment, an inventory of 2,700 hardware units was recycled, consisting of servers, computers, hard drives and Wi-Fi access points, among other devices.

5.4.2.5. Responsible consumption of resources

PRISA Group is aware of the importance of making conscious, responsible use of the natural resources and materials consumed by its activity, thus ensuring that any negative environmental impact is minimised. Thus, the Group focuses on reducing consumption as much as possible and promoting actions that encourage sustainable development.

An example is the progress made in recent years in the consumption of sustainably-sourced paper, with percentages close to 100% in Spain and Latin America.



Consumption of raw materials

In 2022, PRISA Group's paper consumption was 17% lower than in 2021 (59,444 tons). It should be noted that 99% is sustainably sourced and 82% is certified by international standards (FSC, PEFC, SFI).

		202	22		
Consumption of raw mater	riale	Total	% of		
Consumption of faw mater	00104111p1001 01 1m11 11m1011m10				
	(tons)	paper			
Sustainably sourced paper	Not certified	8,659	18%		
	Certified (FSC or equivalent)	40,210	82%		
(including recycled)	(PEFC, SFI)	40,210	02 /0		
(including recycled)	Total consumption of sustainable	48,869			
	paper and cardboard	40,007			
Paper of unknown	Paper and cardboard of unknown	525			
source*	source	323			
Total consumption	49,393	99%			

^{*}We understand " Paper of unknown source " to refer to the consumption of paper for which we do not identify the manufacturer and, therefore, the traceability from its source. So, it is not possible to identify it as, or state it to be, sustainable or not.

At Prisa Media, 100% of the paper consumed for printing publications is sustainably sourced.

At Santillana, 99% of the paper and cardboard consumed to print products is sustainably sourced, and 77% has FSC or similar certification, which guarantees that it is sourced from sustainably managed forests.

The change with respect to 2021 is explained by, among other actions implemented, the lower volume of paper purchased by Brazil in 2022, the promotion of digitised processes (thus reducing the amount of printing in offices), and the reduction of the format of the AS sports newspaper, with a saving of 6%.

Water consumption

PRISA Group mainly consumes water for daily use in its offices and warehouses, as well as for the processes of cleaning its facilities. This water is obtained from the corresponding municipal public network. In no case does it have its own supply points.

By business unit, Santillana reduced its water consumption by 5%, while Prisa Media increased its consumption by 15%, mainly due to the return of employees to the offices following the end of the pandemic.



Total water consumption (m³)	2022	2021	2021-2022 annual variation (%)
Santillana	31,778	33,469	<i>-</i> 5%
Prisa Media	18,283	15,939	15%
Total	50,061	49,408	1%

		Año 2022					
Intensity of water consumption (m3/Number of employees at year-end)	Total water (m3)	Number of employees at year-end	Intensity of water consumption	Total water (m3)	Number of employees at year-end	Intensity of water consumption	% Variación 2021/22
Santillana	31,778		4.40	33,469		4.92	-10.65%
Prisa Media	18,283	7,222	2.53	15,939	6,796	2.35	7.94%
Total	50,061		6.93	49,408		7.27	-4.65%

Power consumption

Total energy consumption in 2022 was 12% lower than in 2021 (down from 33.4 GWh to 29.4 GWh). In addition to the efficiency measures implemented, this reduction is explained by the fact that, since January 2022, PRISA no longer owns printing plants, and by the measures the Group has applied to improve efficiency continuously:

- The design of the new Santillana offices in Colombia to contribute to energy savings, with motion sensors and LED lighting.
- Efficient lighting technology in the main installations in Spain and in some business units in Latin America (Prisa Media Mexico and Chile, and Santillana Peru, Argentina, Honduras and Brazil).
- Installation of timers in traffic areas and replacement of conventional lights with LED, as in the Santillana corporate headquarters in Madrid and in the new Santillana offices in Bogotá.
- Installation of more efficient air conditioning equipment in Santillana Argentina and transmitters in Radio Chile.
- Policy of switching off equipment and lighting in the branch during non-operational hours, accompanied by control routes and movement sensors to promote energy savings.
- Awareness-raising and energy efficiency campaigns.



PRISA Group's		2022								
electricity consumption	renewable sources ren		Use of renewable energy (%)	Total consumption (GWh)	Total consumption (GWh)					
Santillana	2.6	1.3	32%	3.9	4.7					
Prisa Media	3.2	22.4	88%	25.5	28.7					
Total consumption	5.8	23.6	80%	29.4	33.4					

Of all the progress made, the increase in the proportion of renewable energy consumed (12% higher than in 2021) stands out. Looking at the business units, the high proportion of renewable energy consumed by Prisa Media (88%) stands out.

This progress is the result of two measures taken: from July 1, 2021, purchase of 100% renewable energy with a Guarantee of Origin (GDO) certificate in Spain, plus self-generation. In June 2022, a second photovoltaic plant was started up in the Miguel Yuste headquarters building, resulting in the production, from the two plants, of 189.63 MWh of clean energy for self-consumption.

Some Latin American countries, such as Chile, Argentina, Colombia, Brazil and Costa Rica, have started to report their consumption percentage in relation to the generation mix published by their respective governments.

Use of renewable	2022	2021
energy	80%	68%

<u>Fuel consumption</u>

	20)22	2021							
	Natural Gas (m3)	Diesel (liters)	Natural Gas (m3)	Diesel (liters)						
Corporativo	0	6,606	-	-						
Santillana	16,466	16,666	13,580	6,177						
Prisa Media	155,796	67,787	244,684	120,744						
Total Grup	172,261	91,059	258,264	126,921*						

^{*} Corrected data, in 2021 it was reported, due to a calculation error, 368,407 liters

In 2022, a significant reduction in the consumption of fossil fuels was achieved by replacing these sources of energy with renewably sourced energy, as explained in the previous section. In this way, the consumption of natural gas fell by 33% and diesel by 28% compared to 2021.



5.4.2.6. Fight against climate change

The Group is aware of the great challenge facing society, and especially the private business sector, in the fight against the climate emergency. It is therefore an essential part of the company's environmental strategy and objectives. Thus, with regard to minimising the impact of the Group's business activity, linked to the emission of greenhouse gases, the following measures have been established:

- Promoting actions to become more energy efficient and reduce fuel consumption, through the various measures explained above (including the promotion of renewable energies).
- Promoting sustainable mobility:
 - o Initiating a plan for the gradual replacement of the fleet in Spain by vehicles with ECO technology (30% in 2022 vs. 27% in 2021).
 - o Encouraging sustainable mobility by assisting in the acquisition of monthly public transport season tickets.
 - o Installing charging stations for electric vehicles in the Miguel Yuste offices, which has avoided emission of 0.358 tons of CO2.
- Digitalisation of the Group's businesses, leveraging the momentum of digital transformation and innovation. Within the framework of this process, recycling of desktop computers and decommissioning of servers has allowed a saving to be made of approximately 92 tons of CO2/year6).
- Promotion of awareness-raising activities, projects and events that reinforce the public commitment of PRISA Group to contribute to the United Nations Agenda 2030 and to SDG 13 "Climate action".

Carbon footprint Scopes 1 and 2 (t CO ₂ eq)	2022	2021	% Variation 2021-22
Total Scope 1 emissions (t CO ₂ eq)	6,604	778	749%
Total Scope 2 emissions (t CO ₂ eq)	1,926	3,325	-42 %

In relation to the carbon footprint, Scope 1 emissions increased significantly in 2022 due to the reclassification of some emission sources that in 2021 were reported within Scope 3, such as fuel consumption (diesel and gasoline) of the Group's long-term car rentals. In 2022, this resulted in an increase of 6,002 t CO_2 e in Scope 1 emissions.

The Scope 2 carbon footprint was reduced by 42% compared to 2021 as a result of switching to 100% renewable energy in Prisa Media Spain.

With regard to the calculation of the emissions of the value chain (Scope 3 emissions), in line with the objective of improving transparency and diligence with regard to the impact on the natural environment, in 2022 the following were included in the calculation:

 $^{^6}$ 262 desktops to laptops = saving 44,268 kg CO₂e/year calculation: laptops (262 x 169 kg CO₂e/year = 44,268) 52 servers shut down - saving 174,956 kg CO₂e/year calculation: 52 servers x 916 kg CO₂e/year = 47,632 kg CO₂e/year Total = 91,900 kg CO₂e/year The Carbon Footprint of Servers-GoClimate Blog



- Emissions generated by the carriers (Axion and Cellnex) of the radio signal in Spain. In 2022, it was verified that these suppliers consume 96.6% renewable energy.
- Transport and distribution (Boyaca) of press in Spain. In 2022, the scope 3 emissions data is included that corresponds to press transportation and distribution, as reported by the main provider in the provinces where it operates. This data is extrapolated to the rest of the provinces where other distributors operate in order to obtain total national data. The data reported in 2021 included transportation but not distribution.
- Subcontracting of distribution and transport in Santillana companies. The main countries started reporting emissions associated with this contracting.
- Reporting of emissions associated with technology providers started and will continue to be developed in the coming years as providers mature in their footprint reporting.
- Emissions generated in press publication printing plants.

Scope 3 carbon footprint 3(t CO ₂ eq	Scope 3 carbon footprint 3(t CO ₂ eq)					
	Short distance flights	625	1,171	-47%		
Flight emissions	Medium distance flights	1,430	193	641%		
	Long distance flights	2,040	768	166%		
Train travel emissions		265	40	562%		
Car travel emissions	Diesel	4	289	-99%		
Car traver emissions	Petrol	11	2.697	-100%		
Carrier emissions (Axion, Cellnex) (1)	Kwh	150	4,629	-97%		
Emissions associated with press	Diesel	4,740	403	1076%		
transportation and distribution (2)	Petrol	193	NA	0%		
Emissions associated with technolo third parties	gical services provided by	351	NA	0%		
	Own	38,009	28,624	33%		
Paper and cardboard (3)	Paper consumption associated with printing services provided by third parties	4,524	NA	0%		
Emissions associated with printing parties (4)	1,883	NA				
¥A74-	Hazardous	0	NA	0%		
Waste	Non- hazardous	403	NA	0%		
TOTAL Scope 3 emissions		54,628	38,814	41%		

⁽¹⁾ Carrier Emissions corresponding to Prisa Media (Radio).

′

⁽²⁾ Transportation and distribution. Emissions corresponding to Prisa Media (News distribution of publications) 4,282 tn CO2 and other messaging emissions.

⁽³⁾ Own paper and cardboard correspond to Prisa Media and Santillana. Third party paper only Santillana.

⁽⁴⁾ Printing services. Emissions corresponding to Prisa Media (News)



Intensity of Scope 1, 2 and 3 emissions (t C02 eq/Number of employees at the end of	Total emissions (t Co2 eq)	Total number of employees at year- end	Intensity of Scope 1 and 2 emissions	Total Scope 1 and 2 emissions (t Co2 eq)	Total number of employees at year-end	Intensity of Scope 1 and 2 emissions	% Variation 2021/22
the year)							
Scope 1	6,604		0.91	778		0.11	699.19%
Scope 2	1,926	7,222	0.27	3,325	6,796 0.49		-45.50%
Scope 3	52,325		7.25	38,814		5.71	26.86%

Lastly, in 2022, we continued to monitor the scope of the actions that the Group can directly manage on the impact on the environment and the energy it directly requires for its activity (Scopes 1 and 2).

As a consequence of the above-mentioned increase in Scope 1, the cost that the carbon footprint generates for the Group's business due to the direct emissions required for its activity has also increased.

t CO ₂ eq. / €1 m invoiced ⁷							
2022	2021						
10.04	5.54						

5.4.2.7. Other aspects

Protection of biodiversity

Due to PRISA's type of business and based on the analysis carried out in the Non-Financial Risk Map, it has been determined that the business activity has low impact on biodiversity because this activity is carried out in urban areas or industrial estates where there is a low risk of affecting biodiversity.

Food waste

Companies providing catering services at group facilities are now working with responsible management procedures to reduce food waste.

An initiative has been implemented at Prisa Media's Miguel Yuste offices to reduce food waste in the catering centre for employees. The *Last minute* programme has prevented 127 kg of food from ending its useful life cycle as waste.

⁷ Method of calculation: t of CO2 eq. consolidated for scopes 1 (natural gas and diesel) and 2 (electricity) / Annual consolidated turnover (million €)



5.4.2.8. Environmental taxonomy

The European environmental taxonomy of sustainable finance is a classification of economic activities that contributes to achieving the environmental objectives of the European Union and allows investors to know objectively if an activity is sustainable or not.

Currently, the regulatory implementation only requires reporting of climate change mitigation and adaptation to it.

The regulatory framework of the Taxonomy is currently defined by the following regulations:

- Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investments.
- Delegated Regulation (EU) 2021/2139, which establishes technical selection criteria for determining the conditions under which an economic activity is deemed to make a substantial contribution to climate change mitigation or adaptation and for determining whether that economic activity does not significantly detriment any of the other environmental objectives.
- Delegated Regulation (EU) 2021/2178, which specifies the content and presentation of information to be disclosed by companies regarding environmentally sustainable economic activities and specifying the methodology for complying with the disclosure obligation.

As this regulation still being implemented, there is some degree of uncertainty regarding the application and interpretation of certain aspects of it.

Eligibility

- The proportion of total turnover in eligible and non-eligible economic activities according to the Taxonomy.
- The proportion of investments in capital expenditures (CapEx) in eligible and noneligible economic activities according to the Taxonomy.
- The proportion of operating expenses (OpEx) turnover in eligible and non-eligible economic activities according to the Taxonomy.

Alignment

Non-financial entities will disclose the proportion of their activities aligned for adaptation and mitigation objectives. Here it is important to remember what is understood by "eligible activity" and "aligned activity":

• Eligible activity (reported in this report): any activity that has potential to contribute substantially to one or more of the environmental objectives defined by the EU Taxonomy Regulation (Delegated Regulation (EU) 2021/2139) in its annexes I (mitigation) and II (adaptation).



Aligned activity: eligible activities that meet the requisites of a substantial contribution
to at least one of the six objectives defined in the Regulation, that comply with the
principle of doing no significant harm to the other objectives, and that comply with the
minimum social guarantees in line with OECD Guidelines and the UN's Guiding
Principles.

Scope of the report

In 2021, the Group made an eligibility analysis of the activities carried out, in accordance with the provisions of current regulations.

In 2022, this eligibility exercise has been reviewed, leading to a revision of the criteria applied in 2021.

Regarding compliance with the alignment criteria, the PRISA Group will carry out, as part of its Strategic Sustainability Plan 22-25, an evaluation of the exposure of its activity to the physical climatic risks in appendix A of Royal Decree 2021/2139 in order to be able to determine, as applicable, the alignment of the activities considered eligible.

Scope of the Taxonomy

As part of its continuous improvement exercise, in 2022 PRISA once again compared its main activities with the catalogue of activities published by the EU Taxonomy regulations.

Following the analysis made, based on the breakdown at accounting and management level of income and expenses for each of the three indicators considered key, a new eligible activity was identified that can contribute substantially to adaptation to climate change:

- 13.3 Cinema, video and television programme activities, sound recording and music publishing.
- 8.3. Radio and television scheduling and broadcasting activities.

Results

The analysis carried out is based on the accounting and management breakdown of the income, CapEX and OpEX items. The Group's consolidated information was used. The identification of items was based on corporate management control criteria.

Percentage of eligibility of the volume of business

This indicator shows the relative importance of the net business volume arising from products or services associated with economic activities contemplated by the Taxonomy over total net Income.



BUSINESS VOLUME (Net to	BUSINESS VOLUME (Net turnover)				contr	stantial ibution teria	Do	Do No Significant Harm (DNSH) criteria							
Codes	Economic activities (EUR thousands)	Absolute turnover (EUR thousands)	Share of turnover (%)	Climate change mitigation (%)	Climate change adaptation (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Taxonomy-compliant share of turnover (%)	Category (facilitating activity) (F)	Category (transition activity) (T)
	ACCORDING TO THE TAXONOMY														
	nable activities (that are taxonomy-compliant)				1										
Turnover from environment	ally sustainable activities (that are taxonomy-compliant) (A.1)	244,9		28.9%	0%	100.0%				-			100.0%	-	-
10.0 6:	8.3 Radio and television scheduling and broadcasting activities	240,6	538	28.4%	0%	100.0%				-			98.2%	-	-
	video and television programme activities, sound recording and music publishing	4,29		0.5%	0%	100.0%				-			1.8%	-	-
	ding to the taxonomy, but not environmentally sustainable (that	are not	taxono	my-con	npliant)										
	rible according to the taxonomy, but not environmentally							_	_						
sustainable (that are not taxonomy-compliant) (A.2)				20.00/											
Total (A.1 + A.2)			930	28.9%						-					
B. ACTIVITIES NOT ELIGIBLE ACCORDING TO THE TAXONOMY				71 10/											
Turnover from activities not eligible according to the taxonomy (B) Written press				71.1 % 18.2%						-					
	Educational book publishing, online platform	153,8 447,4		52.9%						-					
Total (A + B)	Educational book publishing, offline platform	846,21		100%						-					
Total (A + D)		010,4	17.1	100 /0						_					



CapEX eligibility percentage

Defines the proportion of CapEX (investments in fixed assets) that corresponds to assets or processes associated with economic activities covered by the Taxonomy.

CapEX				Substantial contribution criteria Do No Significant Harm (DNSH) criteria										
Codes	Economic activities (EUR thousands)	Absolute CapEX (EUR thousands)	Biodiversity and ecosystems (Y/N) Pollution (Y/N) Circular economy (Y/N) Water and marine resources (Y/N) Climate change adaptation (Y/N) Climate change mitigation (Y/N) Climate change mitigation (%) Share of CapEX (EUR thousands)					Minimum guarantees (Y/N)	Taxonomy-compliant share of turnover (%)	Category (facilitating activity) (F)	Category (transition activity) (T)			
A. ELIGIBLE ACTIVITIES A	CCORDING TO THE TAXONOMY													
A.1. Environmentally sustaina	able activities (that are taxonomy-compliant)													
CapEX of environmentally su	stainable activities (that are taxonomy-compliant) (A.1)	6,781	13.4%	0%	100%				-			100%	-	-
	8.3 Radio and television scheduling and broadcasting activities	6,746	13.3%	0%	100%				-			99.5%	-	-
13.3 Cir	nema, video and television programme activities, sound recording and music publishing	35	0.1%	0%	100%				-			0.5%	-	-
A.2. Activities eligible accord	ing to the taxonomy, but not environmentally sustainable (that are no	t taxonoi	ny-comp	liant)										
	cording to the taxonomy, but not environmentally sustainable (that							-						
Total (A.1 + A.2)		6,781	13.4%	-										
B. ACTIVITIES NOT ELIGIB	LE ACCORDING TO THE TAXONOMY													
	Written press	4,333	8.5%											
	Educational book publishing, online platform	39,585	78.1%						-					
CapEX activities not eligible a	according to the taxonomy (B)	43,918	86.6%											
Total (A + B)		50,699	100%						-					



OpEX eligibility percentage

Defines the proportion of OpEX (operating expenses) that corresponds to assets or processes associated with economic activities covered by the Taxonomy.

OpEX						Substantial contribution criteria Do No Significant Harm (DNSH) criteria									
Codes	Economic activities (EUR thousands)		Share of OpEX (%)	Climate change mitigation (%)	Climate change adaptation (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Taxonomy-compliant share of turnover (%)	Category (facilitating activity) (F)	Category (transition activity) (T)
A. ELIGIBLE ACTIVIT	IES ACCORDING TO THE TAXONOMY														
	istainable activities (that are taxonomy-compliant)	ı		ı	1									T	
OpEX of environmental	lly sustainable activities (that are taxonomy-compliant) (A.1)	203,102 198,724	28.9%	0.0%	100.0%				-				100.0%	-	-
8.3 Radio and television scheduling and broadcasting activities			28.3%	0.0%	100.0%	-				97.8%	-	-			
13.3 Cinema, video and television programme activities, sound recording and music publishing			0.6%	0.0%	100.0%								2.2%	-	-
A.2. Activities eligible a	ccording to the taxonomy, but not environmentally sustainable (that are n	ot taxonon	ny-comp	liant)											
OpEX of activities eligibare not taxonomy-comp	ble according to the taxonomy, but not environmentally sustainable (that liant) (A.2)							-							
Total (A.1 + A.2)		203,102	28.9%						-						
B. ACTIVITIES NOT E	LIGIBLE ACCORDING TO THE TAXONOMY		-1.10:	1											
	Written press		21.1%						-						
OnEV activities not ali	Educational book publishing, online platform	350,959 499,225	50.0%						-						
Total (A + B)	ible according to the taxonomy (B)	702,327	71.1% 100%						-						



5.4.3. OUR VALUE CHAIN

The PRISA Group is aware that, in order to achieve true sustainability, it must manage and work towards a responsible value chain, with practices, policies and procedures that are in line with the environmental and social impact of the management of this matter by its suppliers.

In October 2022, PRISA's Board of Directors approved the Suppliers' Code of Ethics and Conduct, which indicates the behaviour expected of the Group's suppliers on matters of legislation, human rights, employment rights, business ethics, anti-corruption measures, environmental protection, and confidentiality and privacy.

All negotiation specifications include a reference to the obligation for suppliers to know and accept the Code, and the contracts signed with awarded suppliers have a clause expressly included requiring them to assume and comply with the strictest principles of responsibility, transparency and business ethics, and to declare that they are fully aware of the provisions of the Code of Conduct and Ethics for Suppliers currently in force and published on the Group's website www.prisa.es.

PRISA has a supplier approval procedure that establishes the guidelines on knowing, evaluating, and validating certain supplier capacities and conditions, prior a commercial relationship with any PRISA Group company being established and formalised.

The purpose of these guidelines is to implement a homogeneous, standardised, systematised, transparent and objective procedure for the identification, approval, and periodic evaluation of the suppliers with which the Group works, ensuring that the procedure to maintain them or include them in PRISA's value chain has conditions with full guarantees and the minimisation of any risks that could impact the Group's reputation.

In accordance with the standards established by PRISA, and aligned with the principles of the Global Compact, suppliers must respond to the request they receive from the Purchasing Department by providing information on their sustainability position in the following fields:

- Financial, tax and employment
- Human rights
- Environmental and quality management
- Occupational health and safety
- Compliance with current legislation in each country where it operates.

Those that correctly comply with the above procedure and keep the information updated are considered approved suppliers for the Group.

In 2022, 73% of the PRISA's Group suppliers have been approved in terms of environmental practices, employment practices, human rights and social aspects, the rate was similar to that of the previous year.



Due to the progressive migration of our businesses to digital formats, the demand for technological, energy and professional services is increasing, reducing the need for paper and printing. Therefore, the risks associated with waste management are decreasing and are continually monitored in the course of activity, so it is not planned to carry out an audit of the current supplier base in the medium term.

The company has set itself the objective of continuing its commitment to developing and generating a positive impact on its suppliers, promoting a local value chain, in line with the United Nations' Agenda 2030 and, in particular, with SDG 8 on decent work and economic growth.

In this respect, the objective is to maintain a consolidated allocation in each business grouping, over the next three years of more than 80% of the payments to be made to suppliers with a tax residence where the purchase and delivery of the product or service takes place.

Thus, in 2022, payments to suppliers for the entire PRISA Group amounted to 569 million euros, 91% of which were made to local suppliers (EUR 517 million). By Business Unit, Santillana and Prisa Media account for 91% and 90% respectively of their spending with local suppliers.

Daymant to		2022			2021	Local	Total	
Payment to suppliers (EUR millions)	Payments to local suppliers	Total payments to suppliers	% of payments to local suppliers	Payments to local suppliers	Total payments to suppliers	% of payments to local suppliers	suppliers 2021-2022 annual variation	suppliers 2021-2022 annual variation
Corporate	11	13	87%	9	11	88%	20%	20%
Santillana	282	310	91%	241	265	91%	17%	17%
Prisa Media	223	247	90%	231	248	93%	-4%	-1%
Radio	115	119	97%	116	124	93%	0%	-4%
News	108	128	84%	116	124	93%	-7%	3%
Total	517	569	91%	482	523	92%	7%	9%

The average payment period to suppliers has been 71 days (63 days in 2021) in 2022.

5.5. SOCIAL IMPACT

PRISA is a leader in the creation and distribution of cultural, educational, informational and entertainment content for Spanish and Portuguese language markets. It aspires to use its leadership to generate a positive social impact. PRISA works towards social progress by contributing to the economy in the regions where it operates, through public participation, commitment to the Sustainable Development Goals, support for non-profit entities, and by responding to the demands of its users, readers, and listeners.

5.5.1. SHARED VALUE

5.5.1.1. Impact of the Group's activity on employment and local development

PRISA's direct impact on society is reflected in the value generated and distributed in 2022. The Group's direct contribution is a consequence of its business activity. Thus, it details its income and the expenses incurred, including payments to staff, associated with the contribution of value in the generation of employment.



EUR thousand	2022	2021
Economic value generated	861,738	754,085
Operating income	850,189	741,168
Interest income	5,562	11,513
Profit or loss under the equity method	5,986	1,404
Economic value distributed	860,772	743,198
Cost of materials used	410,215	360,208
Staff costs	297,882	307,945
Finance costs	132,226	60,444
Payment of taxes on profits	15,494	13,219
Dividends	4,955	1,381
Economic value retained	966	10,887

In 2022, the Group generated value of EUR 861,738 thousand and contributed distributed value of EUR 860,772 thousand, representing an increase of 14.3% on the value generated and 15.8% on the value distributed in 2021. Personnel expenses accounted for 34.6% of the total economic value distributed. This represents a high impact in terms of employment. PRISA is a dynamic group with a significant international presence, mobilising a diverse and multicultural workforce. It has 7,222 employees, most of them recruited locally where the Group operates. Therefore, it is an activating agent for employment and for social and economic development and growth in the different communities.

Prisa Media, with 3,786 employees, boosts the employment markets mainly in Spain, Colombia, Mexico and Chile, through the radio and press activity of its brands, and promotes the employability of university students through educational cooperation agreements with universities in their regions.

In Spain, it also collaborates with the FCT Job Training Centres, helping students from intermediate and higher-level training courses to improve their professional profile. It also collaborates with the Human Age Foundation for social and employment inclusion of people with disabilities. Currently, a scholarship is available in Barcelona aimed at helping to close the gap between the world of work and people with disabilities.

In Colombia, the Caracol broadcaster, together with the NGO Ayuda En Acción and Externado University, offers the 2022 regional journalism scholarship, "there is a future, we leave our mark", an initiative that stimulates regional journalism and offers one of the winners a journalism internship at their local broadcasting station.

Santillana, through its activity, boosts the economy in the educational sector in the regions where it operates and also boosts business in other sectors. In addition to the direct employment generated (3,395 employees), its main activity has a positive impact on creating indirect employment in the graphic industry and in printers, sales channels (bookshops/*e-commerce*), in the logistics and distribution sector and in the digital industry (platforms), and on the employability of other freelance professionals, such as authors, designers, editors, proofreaders, illustrators, etc.



The educational forums and events that Santillana organises to educate the educational community on new methodological, technological or socio-emotional trends also contribute to revitalising the industries associated with this type of activity, such as the marketing and restaurant sectors.

Santillana also promotes the development of local employment through initiatives like the company's programme of apprenticeships and internship in different areas of the company in Brazil. Currently, there are 11 apprentices and 8 interns. Its SFB educational system promotes student entrepreneurship through the Start SFB contest, which rewards innovative business projects, aided by mentors and an online project development platform.

In Ecuador, Santillana participates actively, through the Ministry of Employment, in the employability of people with disabilities, and it promotes "University Internships" and access to their first job for young people between 18 and 26 years of age. Mexico participates in job fairs organised by universities, and in government and private job exchanges. It also has talent seedbeds and supports micro-entrepreneurs in the distribution and sale of educational materials in the agreed-exchange-rate market.

5.5.1.2. Impact of the Group's activity on local populations and the territory

The impact on employment is complemented by the positive impact, beyond that of purely informative and educational content, that the activity of PRISA and its business units has on local populations. Numerous forums and events strengthen links and communication with *stakeholders*, especially with local audiences and educational communities, offering meeting spaces, information, training and knowledge on numerous topics.

In Santillana, 2022 saw the following notable advances in the promotion of sustainable development: Sustainable Development Goals incorporated across new educational content as of 2023; teacher training initiatives in this area; social projects impacting minorities and students in vulnerable situations; actions aimed at reducing our environmental footprint; and a greater institutional commitment to local and regional ESG entities in Latin America.

The Education business unit's commitment to sustainability is also channelled through the Santillana Foundation, which in 2022 continued to play a very relevant role in countries such as Brazil and Argentina in fostering debate and promoting inclusive and equal education.

Through its brands, Prisa Media works hard to raise awareness about social and environmental challenges, in its news content and in spaces dedicated to reflection and airing expert opinion. Initiatives like *Future Planet*, *Future America*, *Materia* and *Retina*, the social and climate pages and the gender correspondent of El País newspaper, the good governance section of Cinco Días newspaper and Cadena SER radio's news and programmes, are just some of the many windows engaging the public with current events from a sustainability perspective.

But it also mobilises people through the numerous forums and events held with collaborating or sponsoring entities, in a clear contribution to SDG 17, partnerships for the goals.



The future of work, geopolitical and economic trends, social and climate challenges, urban mobility, depopulated Spain, energy and digital transformation, sustainable finance and well-being are some of the main topics with an ESG element that are addressed, in addition to the commitment to humanitarian aid, equality and diversity.

In Colombia, the CARACOL-Radio W Foundation was created in November 2022, with the corporate purpose of encouraging, supporting, promoting, and developing activities, programmes and projects related to culture, social development, environmental protection, science and technology, business development, human rights and institutional strengthening.

5.5.1.3. PRISA Group's contribution to the SDGs

PRISA is firmly committed to sustainable development and to the United Nations' Agenda 2030.

PRISA's 2022-2025 Sustainability Master Plan (SMP) has seven priority Sustainable Development Goals (SDGs) for its activity: quality education (SDG 4); gender equality (SDG 5); decent work and economic growth (SDG 8); reduction of inequalities (SDG 10); responsible consumption and production (SDG 12); climate action (SDG 13); and peace, justice and strong institutions (SDG 16). Plus the cross-cutting SDG of partnerships for achieving the goals (SDG 17). In 2022, the Group developed multiple initiatives specifically aimed at contributing to the seven strategic objectives and SDG 17.

SDG 4, Quality education



Undoubtedly, one of the most significant SDGs, towards which PRISA's Santillana business unit makes a decisive contribution. Its commitment is to offer life opportunities through education, leading the transformation and the improvement of education centres in Latin America, offering students, teachers and schools a quality education that is inclusive and equal. The company stands as an ally of schools in meeting the challenge of educating on sustainable development. To this end, it contributes to teacher training, with specific courses on ESG, and to raising awareness in students, with contents that reflect the diversity of society and stimulate reflection on the great global challenges (social and environmental) in Agenda 2030.

One of the SMP's key objectives is precisely to incorporate sustainable development in 100% of Santillana's new educational projects by 2025, already to reach 45% in 2023, with content on sustainability and the SDGs for students and teachers. Projects like *Amazement* of Sharing, for preschool and primary school pupils in Mexico, includes learning phases inspired by the SDGs to be worked on from an early age. In Colombia, *Actively Digital*, *Chrysalis* and *Set 21 Robotics* get students of different educational levels involved in constructing solutions to the problems and challenges posed by the different SDGs.

Fostering reading is another area in which Santillana disseminates and raises awareness about sustainability, with more than 2,000 books for use in working on the SDGs. *Digital What-I-Read* includes activities to get students in touch with Agenda 2030 in a practical way.

Also in 2022, an online mini-training course on SDGs was offered to 100% of the teachers registered on the *Training Paths* platform, reaching 6,152 people.



SDG 4, Quality education



In addition to raising awareness among students and teachers through content, Santillana's social action strategy seeks to respond to United Nations Target 4.5, which proposes to "eliminate gender disparities in education and ensure equal access to all levels of education and vocational training for the vulnerable, including persons with disabilities, indigenous peoples, and children in vulnerable situations". The #VoyaSer programme, run in Peru and Guatemala, helps indigenous girls in vulnerable situations to complete secondary education and train in digital and social skills that help them in their personal and professional development. This initiative, developed in partnership with the Entreculturas Foundation and the Fe y Alegría education movement, was one of the good practices finalist in the Global Sustainability Week Awards in Spain.

The Santillana Foundation also carries out actions to promote dialogue and reflection to promote a more equal, diverse and inclusive education. In 2022 alone, the activities and publications in Brazil reached close to 200,000 people. In Argentina, it has continued to contribute to the educational debate, with publications such as 50 teachers who are transforming Latin America, and highlighting good practices with the VIVALectura Award.

Prisa Media's impact on SDG4 in 2022 has been in the form of forums such as *El País with your future*, an educational meeting place focused on the world of work and professional development that gives career guidance to young people in their last year of secondary school and vocational training school. A total of 23 experts in artificial intelligence (AI), robotics, blockchain and cybersecurity explained their work to 975 students.

Since 1986, PRISA has been involved with the UAM-El País School of Journalism, a non-profit foundation controlled in equal shares by the Autónoma University of Madrid and El País. Its main activity is the Master's degree in journalism, which had 69 students in 2022.

In Colombia, W Radio took part again last year in the *Vamos Pa'lante* (Go Ahead) campaign, run by Los Andes University and five other universities in the country, to grant scholarships to support undergraduate students at risk of dropping out from their studies for economic reasons. In 2022, grants were given to 1,128 students.

SDG 5, Gender equality



In Santillana, awareness about equal opportunities and gender non-discrimination is raised through projects such as #VoyaSer, aimed specifically at girls, in a bid to stimulate female talent, providing tools for empowerment and personal and academic growth.

The Sustainability Master Plan includes the creation of editorial guidelines to reinforce gender parity in the images and illustrations in educational content and so reflect the social reality of female representation.



SDG 5, Gender equality



Prisa Media, through the Cadena Dial radio station, continued with the campaign *Equal in Diversity. Really Free* in favour of a diverse society, with equal rights and opportunities. In 2022, it focused its actions on giving visibility to diverse gender identities and sexual orientations. Local radio is also very active on social and gender issues, with initiatives such as *Dialogues for equality* on Radio Bilbao. On ADN Chile, the podcast *Women in sport* makes known the stories of the country's leading women athletes, the disciplines in which they stand out, and their views of the future to inspire new generations.

El País newspaper has had as gender correspondent since 2018, a pioneer in Spain and one of the first to cover this topic in the world, whose reporting focuses on defending women's rights and combatting gender violence. In November, the gender correspondent, Isabel Valdés, received the *Meninas* 2022 award given by the Government Delegation in Madrid.

Other forums, such as *Female Talent*, organised by El País, have provided an opportunity to reflect on leadership for social transformation and how to close the gender gap at the top of organisations.

SDG 8, Decent work and economic growth



In carrying out its activity, the Group stimulates local employment throughout its geographic sphere of influence in Spain and Latin America.

Prisa Media held important economic and employment forums, such as the well-known El país with your future and Work of the future and the future of work, organised by Retina, on the need to train future generations to put innovation at the service of personal and social well-being.

The Cinco Días Awards for Business Innovation, in their fifteenth edition, have become a key event in the business world, recognising the most innovative projects in the business sector, including a specific "more responsible initiative" category. Los *The Radio San Sebastián Excellence Awards* also recognise people, companies and institutions in Gipuzkoa with an outstanding record, some of them in the field of social impact.

Cadena SER Euskadi, in its *Meetings, SDGs and the keys to sustainable development* series, dedicates a space to learning about what companies and other groups are contributing towards complying with Agenda 2030.



SDG 10, Reduced inequalities



Santillana develops different educational projects to promote the inclusion of students, regardless of their different abilities, gender, race or ethnicity. In addition to the #VoyaSer programme, aimed at indigenous girls in vulnerable situations, the Santillana Foundation in Brazil has created a podcast that addresses the need to move towards democratic education that combats ethnic and racial inequalities.

In language teaching, a new digital reading programme, *Richmond iRead*, has been created for primary and secondary levels to help students with dyslexia improve their learning.

The company is working on the project *Santillana Inclusive*, to be ready in 2023, which will implement effectively the principles of inclusiveness in schools. It includes curricular materials adapted to students of different abilities or functional diversity, and psycho-pedagogical guidance and advice to schools.

At Prisa Media, initiatives have been carried out such as Radio SER's *Depopulated Spain*, a travelling event that every year visits at least 10 Spanish municipalities affected by depopulation, seeking to give them a voice and learn about success stories and different models of living.

SDG 12, Responsible consumption and production



Making society aware of responsible consumption is key to advancing sustainable development. Closely related to SDG13, Climate Action, Prisa Media does an extraordinary job of radio and press reporting, and in different forums for reflection. The *Global Cities* series, organized by El País, has addressed issues such as urban mobility and energy renovation, and *Depopulated Spain*, on Cadena SER, also discovers more sustainable models of consumption and rural life.

Podium Podcast, PRISA's native podcast platform, was used in 2022 to launch *U-turn*, an audio branding podcast that tries to answer questions like what type of energy we should consume, where does what we eat come from, what impact do the brands we choose have on our environment, and what waste do we generate daily.

Cadena SER's *Wellness Congresses* are also spaces for reflecting on the relationship between nature and well-being, on consumerism and our way of life, and the need for models that facilitate personal and emotional balance.

SDG 13, Climate action



Raising awareness about climate change and its consequences is an outstanding line of work in the different Prisa Media brands, with initiatives such as the *Ecosystem Now*, organised by El País, which aims to communicate commitment and action on the great challenge that we face as a society.



SDG 13, Climate action



Retina organised the second edition of the *Retina Eco Awards*, which rewards the best projects in the fight against climate change and in sustainability using technology.

LOS40 radio station has continued in its firm commitment to caring for the planet, promoting actions in favour of the environment aimed at raising awareness in a young audience, which is especially sensitive to such causes. The *El Eco campaign on LOS40* proposes to carry out 40 initiatives combining music and ecology for radio station to promote sustainability, with actions such as *Eco Talk* and *Trash to Live*, which encompasses various initiatives to reduce and offset the waste generated at its festivals and concerts.

The Cadena SER podcast, *Earth in sight*, and the Caracol radio programme in Colombia, *Planet Caracol*, are other examples. Caracol radio also supports the Climate Emergency Summit, of the Government of Antioquia, with information and advice to listeners on how to adopt practices that are responsible to their environment.

Especially important for Santillana is Target 13.3, which proposes to "improve education, awareness raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction, and early warning." To this end, it has launched initiatives such as the workshop held in Puerto Rico on hurricanes and their impact, from the perspective of learning and community self-management, aimed at teachers and families. Also of note is Santillana Honduras's participation in the *Climate Friendly Schools* project, in which students from different schools learned over a period of two months about energy saving, about the 3 Rs (reduce, reuse and recycle) and how to act in the event of a natural disaster. They planted more than 2,500 trees and built models from reusable materials, which were exhibited at the Recycling Fair and Recyclathon 2022.

SDG 16, Peace, justice and strong institutions



Prisa Media's media outlets have the vocation and mission to offer daily reporting that is full and truthful, current and of high quality, in order to help readers, listeners and users to understand the reality they live in and to form their own criteria.

In 2018, El País joined The Trust Project an initiative that was launched with the aim of strengthening public trust in the media through greater transparency and accountability. By creating a set of trust indicators and digital standards, this project aims to identify and prioritise quality information from rigorous media.

In 2022, the Group participated in a newly created forum, the Observatory of Information Governance and Transparency in the digital age, which was created to promote a culture of governance and information transparency among the main information media companies in Spain and Latin America.



SDG 16, Peace, justice and strong institutions



The Group, fronted by Cadena SER radio and El País newspaper, condemned the war against Ukraine from the start and determined to offer the best reporting coverage, with a significant deployment of reporting staff on the ground. In addition, it has granted advertising space to the Emergency Committee, which has implemented its fundraising protocols to support the actions of member NGOs following the attacks on Ukraine.

Prestigious awards, like the Ortega y Gasset Journalism Awards, created in 1984 by El País, highlight the best journalistic works, originally published in Spanish, during the previous year, which exemplify defending freedoms, independence and rigour as virtues of the profession. The 39th edition of the awards recognised two reports supportive of victims of the abuse of power, a photograph that captured the pain caused by cancer and of hope in the face of the disease, and the career of two journalists who died to the honour of the best values of the profession. The Ondas Awards |, after 68 editions, maintain their objective of recognising and promoting radio, music and television productions that contribute innovative elements and improve the audience experience. 2022 saw another record level of participation, with 559 candidates from 15 countries.

Forums, such as Retina's Trends, *Ideas for a brand new world*, or SER's Conversation, have had an impact on SDG16, as have Caracol Radio's Challenges to Democracy series and ADN's Constituent Citizen podcast in Chile, where constitutional experts answered questions about the country's new constitution.

SDG17, Partnerships for the goals



Although many of the actions and events carried out in the Group had the participation of other companies or entities, in 2022 the Group strengthened its institutional support for Agenda 2030 and increased its participation in prominent forums and relevant organisations in the area of ESG. The Group is a member of the United Nations Global Compact, forming part of the Executive Committee of its Spanish Network, and is committed to the Ten Principles promoting human rights, the fight against corruption, employment rights and care for the environment.

At the UN General Assembly held in Madrid, Spain, in June, Sanda Ojiambo, Assistant Secretary-General and CEO of the United Nations Global Compact, gave PRISA the Contigo Somos+ award, for attracting new members to the Spanish network and for disseminating the Sustainable Development Goals (SDGs) through the campaign #apoyamoslosODS.

Other important steps were Santillana Educação y Moderna joining the Brazilian network of the UN Global Compact, and the alliances generated in Santillana Argentina by its participation in the UNESCO Master Class on Education for Sustainability and Global Citizenship, held at the University of San Andrés.



SDG17, Partnerships for the goals



The Group forms part of the SERES Foundation and is a member of Forética, both leading organisations in sustainability and corporate social responsibility in Spain. In the latter, in 2022, the Group took part in the Social Impact and Transparency, Good Governance and Integrity clusters, and was as a media partner in the "JOBS 2030 - Future of Work" project, an initiative that seeks to advance sustainable growth in society by ensuring diversity and inclusion in the workplace.

In the field of education, PRISA is a patron of the following: the CYD Knowledge and Development Foundation, which analyses and promotes the contribution of universities to Spain's economic and social development; the Princesa de Girona Foundation, which supports young people in their career and personal development; and the FAD Youth Foundation, of which it is a founding patron and member of its media committee, which promotes the personal and social development of teenagers and young people through education in positive attitudes and the prevention of social risk behaviour.

In the field of innovation, research and development, PRISA Group is a founding trustee of Fundación Pro CNIC (National Centre for Cardiovascular Research) and helps disseminate its campaigns. It also supports the Carolina Foundation in educational and scientific matters.

In defence of democratic principles and development of the information society, PRISA collaborates with the Hermes Foundation, and, in 2022, it became part of a newly created forum, the Observatory of Information Governance and Transparency in the digital age, created to promote a culture of governance and information transparency among the main information media companies in Spain and Latin America.

In its commitment to combat climate change, the Group partners with the World Wildlife Fund (WWF), the largest independent international organisation that advocates for nature and the environment. Since 2009, it has supported Earth Hour, contributing to SDG 13, Climate Action.

It is also a media partner of the Emergency Committee, made up of five NGOs (Action Against Hunger, Doctors of the World, Oxfam Intermón, Plan International and World Vision) that channel the solidarity of citizens and companies in major humanitarian emergencies, such as the roll-out of support for victims of the war in Ukraine.

Finally, in the field of distinctions and recognitions, for the third consecutive year, Santillana Honduras has renewed its FUNDHARSE certification as a socially responsible company (SRC), awarded to companies in the country that demonstrate a major commitment to society.

5.5.2. SOCIAL ACTION

The Group's social action is carried out across the business units, according to their local or regional scope of activity. In total, in 2022 PRISA made contributions to foundations and non-profit entities of EUR 5,983 thousand, 61% more than in the previous year (EUR 3,717 thousand in 2021).

By type of contribution, 96% were in kind (89% in 2021). Santillana contributes mainly with educational materials, graded readers, and computers, while Prisa Media provides its advertising space as a support for raising awareness.



Contributions to foundations and non-profit organisations by business unit (thousands of Euros)	Total amount of monetary contributions	Total amount of contributions in kind	Total amount of contributions	of
Corporate	135	271	406	316
Santillana	92	1,341	1,433	661
Prisa Media	33	4,113	4,145	2,740
Prisa Media - Radio	33	1,641	1,674	690
Prisa Media - News	0	2,471	2,471	2,050
PRISA Group Total	260	5,723	5,983	3,717

The value in Spain of this advertising space on the radio and in the Prisa Media press to social entities was over EUR 4 million at market rates, thus accounting for 73% of the company's total contributions in kind. It should be noted that this positive performance (10% increase vs. 2021) means compliance with one of the ESG objectives linked to the refinancing of Prisa.

The reactivation of cultural activity after the pandemic, the contributions associated with the humanitarian emergency campaign due to the war in Ukraine, as well as new agreements reached with entities, such as the FAD Youth Foundation or the Association Against Cancer (AECC), are the main reasons for this increase in social support.

The selection of organisations benefiting is based on criteria such as their reputation, prestige, transparency and solvency, and that their social purpose and activity are in line with the policies of the Group. Contributions to political parties or their foundations are prohibited, as are those to any organisation which is contrary to the values and principles of the company's Code of Ethics.

In 2022, the organisations and campaigns supported by Prisa Media contributed to SDG 10 (Reduced Inequalities), SDG 4 (Quality Education), SDG 5 (Gender Equality) and SDG 16 (Peace, Justice, and Strong Institutions).

In the case of Santillana, the value of its contributions in kind of textbooks, graded readers and other educational materials is over EUR 1.3 million at cost price, which accounts for 93.6% of its total contributions to non-profit organisations. The associations, foundations and NGOs with which it collaborates are mainly related to the education of children in situations of vulnerability, contributing to SDG 4 (Quality Education) and SDG 10 (Reduced Inequalities).

Business unit	N° of entities in 2022	N° of entities in 2021
Prisa Media	59	26
Santillana	28	19
Corporate	9	7
Total	96	52

Below is a breakdown by country and business unit of the contributions in thousands of euros made during 2022.



Contributions to foundations and non-profit organisations broken down by country and business unit (thousands of euros)	Prisa Headquarters	Santillana	Prisa Media	PRISA Group Total
Spain	406	62	3,832	4,301
Brazil	-	17	-	17
Ecuador	-	10	-	10
Panama	-	47	-	47
Chile	-	1	312	313
El Salvador	-	-	-	-
Guatemala	-	9	-	9
Colombia	-	-	-	-
Honduras	-	-	-	-
Mexico	-	1,259	-	1,259
Paraguay	-	3	-	3
Peru	-	20	-	20
Puerto Rico	-	4	-	4
Total	406	1,433	4,144	5,983

5.5.3. COMMUNICATION WITH OUR CUSTOMERS AND USERS

Transparency and commitment to quality in the supply of services are the pillars of PRISA's relationship with its customers, readers, listeners, and other consumers (teachers, students or parents of students in the case of Santillana).

So that they can send their complaints to the Group, the company provides them all with communication channels, such as the Whistleblower Channel for third parties, accessible on the corporate website, and the business units establish specific channels in each country for the same purpose.

In Spain, Prisa Media has a Customer Service Centre where the communication channel with press subscribers is maintained and managed, and from which incidents are handled via chat, calls or e-mail.

In 2022, there were 15,662 incidents, (13,561 in 2021) 86.6% of which were administrative or logistical incidents – mostly related to the use and enjoyment of subscriptions - and the rest were technical in nature. The Customer Service Centre resolves incidents directly or manages resolution with the end suppliers of the services or products. When necessary, incidents are referred to other departments, as in the case of data protection requests, which are sent to privacidad@prisa.com.

In addition, El País has a Reader's Ombudsman. This role, established in 1985, protects readers' interests, attends to their complaints, and verifies compliance with standards in the *Style Guide*.

The creation of a similar role, the Listener Ombudsman, in Cadena SER radio is planned for 2023.



The Group's stations have mailboxes where the public can send comments or suggestions, spaces for comments on the web and in the *app* download stores, channels for participation via audio, text or chats on YouTube, and the *Participate Button* on the Cadena Dial, Cadena SER and Radiolé stations.

Santillana's activity in all countries is aimed at schools, bookshops, distributors, and the end consumer. Each country has a variety of communication channels, which collect complaints and claims related to product delivery times, printing or publishing errors, prices, product volume, scope of products and services and the operation of platforms. In 2022, 1,689 communications of this type were received and processed⁸.

The Group's businesses, activities, and investments in the area of education, radio and press are subject to a regulatory framework that is specific to the sectors where these businesses are run. Except for press business or some activities in the area of education, where there is a direct relationship with the consumer or user, the General Spanish Law in Defence of Users and Consumers (Spanish Royal Legislative Decree 1/2007 of 16 November, as revised by Spanish Law 3/2014 of 27 March) is not applicable.

5.6. FINANCIAL PERFORMANCE

The PRISA Group carries out its business activities seeking maximum profitability for its shareholders and investors without neglecting its social commitment and its fiscal responsibility wherever it operates. The Group thus fosters the trust of the stakeholders most affected by its financial performance, through transparency and timely compliance with its obligations.

5.6.1. SHAREHOLDERS

The main shareholders of PRISA Group's share capital are Joseph Oughourlian (through Amber Capital UK LLP), Vivendi, Rucandio, Global Alconaba, Shk., Dr. Khalid Bin Thani Bin Abdullah Al-Thani (through International Media Group), Roberto Alcántara Rojas (through Consorcio Transportista Occher SA), Banco Santander, Control Empresarial de Capitales and Carlos Fernández. The *free float* of the company is approximately 20%.

Global Alconaba entered as a shareholder in the company in 2022 with a 7.076% stake of the share capital, which stands at 6.77% of share capital after the capital increase carried out in June 2022. Global Alconaba acquired this stake from Telefónica SA, which with this operation closed the year with a 1.869% stake in PRISA's share capital.

In May 2022, Prisa Media acquired the remaining 20% of the share capital of Prisa Radio that was held by the Godó Group.

PRISA's shares are listed on the Spanish stock exchanges of Madrid, Barcelona, Bilbao and Valencia through the Spanish Stock Market Interconnection System (SIBE).

⁸ In 2022, the reporting criteria for complaints and claims received by Santillana have been changed: administrative and technical incidents have been excluded from the calculation as they are not part of the information requirements of Law 11/2018.



At December 31, 2022, the share capital of Prisa was EUR 74,065 thousand, represented by 740,650,193 ordinary shares, all belonging to the same class and series, with a par value of EUR 0.10 each, fully paid up and with identical rights.

In July 2022, PRISA's Board of Directors agreed to terminate the American Depositary Shares (ADS) programme on PRISA ordinary shares, which that had been traded on unorganised markets (*over the counter -* OTC) in the United States since September 2014.

5.6.1.1. Communication with shareholders and investors

PRISA has a policy on information, communication and contacts with shareholders and institutional investors and proxy advisors, and with a series of information channels for the disclosure of economic-financial, non-financial and corporate information to these groups.

The CNMV website (www.cnmv.es) is one of the main general channels for information about the company. The company communicates information through it that, under current legislation, is considered privileged or relevant, as well as any other economic-financial, non-financial and corporate information required by applicable legislation.

The corporate website (www.prisa.com) has a specific "Shareholders and investors" section with all the information required by the Capital Companies Act and by stock market regulations, and the legally required information related to calling and holding general shareholders' meetings and the resources to promote participation. It also retransmits via *streaming* the company's regularly held meetings and presentations of financial results.

The company regularly organises informative meetings on the progress of the company and the Group, and on other aspects of interest to analysts and institutional investors (*roadshows*) in important financial centres in Spain and other countries, which are attended by the CEOs and other executives of the organisation.

In these informative settings, the company takes special account of the rules on processing privileged information and other relevant information, and relations with shareholders and with the markets provided for in law and in the company's internal regulations (in particular, the Rules of Procedure of the Board of Directors, the internal regulations on conduct in matters relating to securities markets and the Code of Ethics).

In the event that the information generated in the company may be classified as privileged information or other relevant information, a communication of in this regard will be sent to the CNMV in advance through the authorised interlocutors designated by the company for this purpose.

Information pending communication to the CNMV may not be disseminated by any other means before it has been published on its website. The content of any information disseminated to the market through any channel of information or communication other than the CNMV must be consistent with the information sent to the CNMV.



At organisation level, the Investor Relations Department (integrated in the Investor Relations Department, which reports, in turn, to the company's Economic-Financial Department) mainly attends to analysts and institutional investors, and the information that provided is fundamentally linked to the management and financial results of the company, as well as its progress in the markets. This department also deals with any questions that may be asked by retail shareholders about the share's evolution in the markets.

In 2022, a total of 86 meetings with shareholders and investors were held. Direct meetings, seminars organised by third parties and two *roadshows* held in London and Barcelona have all contributed to this figure. However, a highlight was the first ever "Capital Markets Day" (CMD) event to be held in the company's history, in which PRISA presented its Strategic Plan for the 2022-2025 period. A face-to-face and virtual event for investors and analysts who regularly follow the company's activity.

This milestone and the all the work done by the department was rewarded with the Spanish Association for Investor Relations' award for the small cap in Spain that has most improved its Investor Relations programme. This recognition gives impetus to the area's objectives for the future: to offer content with more financial detail and that is easier for its users to understand, and to continue improving communication on sustainability to give visibility to the company's progress and improve its presence in sustainability indices.

The Shareholders' Office (part of the Board of Directors Secretariat) mainly attends retail shareholders and provides information on company corporate governance matters (how to access the available information, guidance on the corporate website, issues related to general shareholders' meetings, etc.).

The Department of Communication and Institutional Relations, among other functions, prepares and distributes press releases to the media with news about the company or its business group, and deals with queries, suggestions, and complaints. It also uses social networks as a vehicle to release news about the company or its business group.

The company has a complaints channel, accessible on the corporate website, for all PRISA stakeholders. This can be used to lodge complaints about any possible irregularity or non-compliance related to bad financial, accounting, commercial or regulatory compliance practices committed by Group employees or companies. This is a channel of confidential communication between stakeholders and the Audit, Risk and Compliance Committee and management of the company.

5.6.1.2. General Shareholders' Meeting

Within the framework of the company's General Shareholders' Meeting, one of the Board of Directors' objectives is to promote the informed and responsible participation of shareholders and to adopt all the appropriate measures and guarantees to facilitate the general meeting's effective exercise of the functions assigned to it by the law and by the company's corporate governance regulations. The measures to be adopted by the Board of Directors are the following:

i. It will ensure that all information required under current regulations is made available to shareholders.



- ii. It will endeavour to ensure that all information of interest is made available to shareholders.
- iii. It will respond to shareholders' requests for information made prior to the General Shareholders' Meeting.
- iv. It will respond to shareholders' questions at the General Shareholders' Meeting.

The Board of Directors promotes use of the corporate website to facilitate the exercise of shareholders' rights of information and participation when General Shareholders' Meetings are called. It also makes available a tool for shareholders to request information, delegate their representation and vote remotely.

From the time when the General Shareholders' Meeting is called until it is held, the Shareholders' Office offers guidance to shareholders on the different procedures to exercise their corresponding rights. Shareholders representing at least 3% of share capital may:

- a) Request that a supplement to the call of the ordinary General Shareholders' Meeting be published, including one or more items on the agenda of the call, provided that the new items are accompanied by a justification or, as the case may be, a proposed resolution with an explanation.
- b) Submit reasoned proposals on matters already included, or for matters to be included, on the agenda of the call of a General Shareholders' Meeting.

Public proxy solicitations made by the Board of Directors or by any of its members must justify in detail what way the representative will vote in the event that the shareholder does not issue instructions and disclose any conflicts of interests that may exist.

5.6.2. FISCAL POLICY

PRISA Group is committed to the principles of responsibility, prudence, and transparency in fulfilling its tax obligations and in its relations with the tax authorities.

In line with these commitments to sustainable development, responsibility and transparency, its tax strategy aims to comply with tax regulations in all the territories in which it operates and the guiding principles of good tax governance, collaborate with the tax administrations of the jurisdictions where we operate, contribute to minimising the tax risks that may arise from its activity and ensure responsible tax behaviour with its stakeholders. This must all be done without detriment to the generation of shareholder value, avoiding tax risks and inefficiencies in the execution of business decisions and ensuring good corporate governance.

In this context, in accordance with the provisions of the Capital Companies Act, the maximum responsibility for tax matters in PRISA Group lies with its Board of Directors, with the support of the Audit, Risk and Compliance Committee.

Thus, PRISA Group has a tax strategy that was approved by the Board of Directors in 2015, which sets out the organisation's values, the principles of the strategy, good tax practices and the guidelines for its implementation and communication. Reinforcing the fiscal strategy, the organisation has a manual on the functions of the model of prevention and detection of crimes.



The following table shows a breakdown of the consolidated profit before tax for 2022 included in the consolidated financial statements, distributed by country.

Profit or loss before tax, distributed by country	
(consolidated profit before tax for 2022 included in	EUR
the consolidated financial statements and	thousand
distributed by country)	
Brazil	1,782
Chile	6,202
Colombia	6,820
Mexico	15,604
Guatemala	3,714
Dominican Republic	3,413
Ecuador	5,805
Bolivia	2,962
Peru	(560)
Portugal	(721)
Argentina	3,255
Spain	(62,377)
Costa Rica	756
Honduras	2,931
Panama	813
Paraguay	286
Other countries	6,870
Total	(2,985)

The following table details the amount of income tax paid in 2022, which amounts to EUR 15,494 thousand.

Tax paid on profits, by country*	EUR thousand
Brazil	5,792
Chile	1,468
Colombia	221
Mexico	3,366
Guatemala	1,071
Dominican Republic	1,958
Ecuador	62
Bolivia	466
Peru	-
Portugal	(229)
Argentina	1,071
Spain	(563)
Costa Rica	38
Honduras	290
Panama	68
Paraguay	-
Other countries	415
Total	15,494

^{*} The figures in brackets indicate profits.



In Spain, Promotora de Informaciones, S.A. files consolidated tax returns as permitted by the Spanish Corporation Tax Law. It is the Parent of tax group number 2/91, which includes all subsidiaries that meet the requirements established in the legislation governing the taxation of the consolidated profit of corporate groups.

The other Group subsidiaries file individual tax returns, in accordance with the tax legislation prevailing in each country.

The reconciliation between the consolidated accounting profit and the consolidated tax at the general tax rate in force in Spain is shown in the following table, followed by a brief explanation of the main adjustments applied to determine the taxable basis of the various Group companies.

Finally, subsidies received in the Group represent 0.3% of total operating revenues.

	Income s	statement
	2022	2021
Result before tax from continuing operations	(2,985)	(81,566)
Taxation of continuing activities*		
Rate of 25%	(746)	(20,391)
Consolidation adjustments	(6,538)	(1,881)
Temporary differences	5,031	2,375
Permanent differences (1)	6,940	18,711
Tax loss carryforwards	(308)	(69)
Tax credits and tax relief	74	(111)
Effect of non-activation of tax income (2)	10,364	17,010
Effect of applying different tax rates (3)	(4,543)	3,746
Current corporation tax expense	10,454	19,390
Deferred tax expense on temporary	(5,031)	(2,665)
differences		
Pre-tax on profits	5,423	16,725
Adjustment of prior years' tax (4)	(1,391)	(1,042)
Foreign tax expense (5)	3,354	3,456
Employee profit sharing (6)	2,153	1,096
Adjustments to consolidated tax	744	734
Corporation tax TOTAL	10,283	20,969

^{*} The figures in brackets of continuing activities indicate profits.

- (1) The permanent differences arise mainly from:
 - the different accounting and tax criteria for recording expenditure derived from certain provisions and certain assets,
 - non-deductible expenses,
 - the negative off-balance sheet adjustment for the merger tax difference, attributable to 2018, arising from the merger of Promotora de Informaciones, S.A. and Prisa Televisión, S.A.U. (merger by absorption described in Note 17 of the Notes to the Financial Statements of Promotora de Informaciones, S.A. for 2013), and applying the requirements of the then current article 89.3 of the Tax Law to give it tax effect.
 - 5% taxation of dividends
 - a negative adjustment arising from the recovery for tax purposes of one-tenth of the amount adjusted in prior years as a result of the limitation on the deductibility of write down expense.
 - the limitation on the deductibility of financial expenses provided for in Article 16 of the Spanish Corporate Company Tax Act.
- (2) This relates to the effect of companies that have not recognised a deferred tax asset because they accrued losses in the year.
- (3) This relates to the effect of taxation of profits from American subsidiaries at different rates.



Content required under Law 11/2018 of December 28					Sustainable	
Information required under Law 11/2018	Materiality	Section in report or document providing a response	Connection to GRI indicators	Principles of the Global Compact	Development Goals*	
General information						
 a) A brief description of the Group's business model, including its business environment, organization and structure, the markets in which it operates, objectives and strategies and the main factors and trends that could affect its future evolution. 	Material	5.2. PRISA, a global leader in education and information 5.2.1. Business model 5.2.2. Business strategy 5.2.3. Sustainability strategy 5.3.1. Governance bodies	GRI 102-1 GRI 102-2 GRI 102-4 GRI 102-6			
b) A brief description of the policies applied by the Group in relation to these issues, including the due diligence procedures applied to identify, assess, prevent and mitigate risks and significant impacts and verification and control, including the measures adopted.	Material	Throughout the Statement of Non-Financial Information (5.3.2. Risk management 5.4.2. Environmental commitment 5.3.4. Compliance and business ethics > Fight against corruption and bribery 5.3.5. Respect for Human Rights 5.5. Social Impact)	Indicators contemplated in the Statement of Non-Financial Information in relation to economic, social and environmental aspects	of all in in of all in of all in of		
c) The results of these policies, including the key indicators of significant non-financial results that make it possible to monitor and assess progress and promote comparability between companies and sectors, pursuant to Spanish, European and international frameworks of reference used in each field.	Material	Throughout the Statement of Non-Financial Information (5.3.2. Risk management 5.4.2. Environmental commitment 5.3.4. Compliance and business ethics > Fight against corruption and bribery 5.3.5. Respect for Human Rights 5.5. Social Impact)	Indicators contemplated in the Statement of Non-Financial Information in relation to economic, social and environmental aspects	-	SDGs 8, 16	
d) The main risks related to these issues corresponding to the Group's activities, including, where applicable and proportionate, their commercial relations, products and services that may have negative impacts on these fields, and how the Group manages these risks, explaining the procedures used to detect them and assess them pursuant to Spanish, European and international frameworks of reference used in each field. Information must be included on the impacts detected, offering a breakdown of them, in particular the main risks in the short, medium and long term.	Material	5.3.2. Risk management	GRI 102-15			
Reporting framework used and the principle of materiality	Material	5.1. About this report 5.2.3. Sustainability strategy 5.2.3.3. Materiality	GRI 102-43			



Content required und	der Law 11/2018 of December 28					6
Informat	ion required under Law 11/2018	Materiality	Section in report or document providing a response	Connection to GRI indicators	Principles of the Global Compact	Sustainable Development Goals*
Environmental matte						
	Detailed information on the actual and foreseeable effects of the company's	Immaterial		Immaterial		
	Environmental certification or assessment procedures	Immaterial		Immaterial		
Environmental management	Resources dedicated to environmental risk prevention	Immaterial	5.4.2. The environment	Immaterial	Principle 7. Businesses should support a precautionary approach to environmental challenges.	
		Immaterial		GRI 2-22		
	Use of the principle of precaution	Immaterial		GRI 2-23		
	Provisions and guarantees for environmental risks	Immaterial		Immaterial	Principle 8. Businesses should undertake initiatives to promote greater environmental responsibility	
	Measures to prevent, reduce or repair carbon emissions that have a serious impact			GRI 305-1	1	SDGs 3, 6, 7, 8,
Pollution	on the environment; taking into consideration any form of atmospheric pollution specific to an activity, including noise and light pollution	Immaterial	5.4.2.7. Other aspects	GRI 305-2		
		Material	5.4.2.4. Economía circular y gestión de residuos	GRI 306-2	Principle 8. Businesses should undertake initiatives to promote greater environmental	
J,	carbon emissions that have a serious impact on the environment; taking into consideration any form of atmospheric pollution specific to an activity, including noise and light pollution Prevention measures, recycling, reuse, other ways of recovering Material 5.4.2.7. Other aspects GRI 305-2 GRI 306-2 Frinciple 9. Businesses should environmentally friendly techno GRI 306-3 Principle 8. Businesses should uninitiatives to promote greater environmentally friendly techno GRI 306-3 Frinciple 9. Businesses should uninitiatives to promote greater environmentally friendly techno GRI 306-3 Frinciple 9. Businesses should uninitiatives to promote greater environmentally friendly techno GRI 306-3 Immaterial Immaterial Immaterial Immaterial Indicador no material	responsibility.	11, 12, 10, 10			
1	Actions to combat food waste	Immaterial	5.4.2.7. Other aspects	Indicador no material	Principle 9. Businesses should encourage the development and diffusion of environmentally friendly technologies.	
	Consumption of water and supply of water	Material		GRI 303-1		
	in line with local limits	Material		GRI 303-5		
Circular economy, prevention and waste management Circular economy, prevention and waste management Cc in Cc in Cc in Cc in Muster and in in	Consumption of raw material	Material		GRI 301-1 GRI 301-3	Principle 8. Businesses should undertake	
	Measures adopted to improve their efficient use	Material	5.4.2.5. Responsible consumption of resources		initiatives to promote greater environmental responsibility.	
		26. 11	0.4.2.0. Responsible consumption of resources	GRI 302-1	Principle 9. Businesses should encourage the development and diffusion of	
	Direct and indirect consumption of energy	Material		GRI 302-2	environmentally friendly technologies.	
	Measures taken to improve energy efficiency	Material		GRI 302-4		
			1			



ontent required un	der Law 11/2018 of December 28					
Informat	tion required under Law 11/2018	Materiality	Section in report or document providing a response	Connection to GRI indicators	Principles of the Global Compact	Sustainable Developmen Goals*
	The important elements of greenhouse gas			GRI 305-1		
	emissions generated as a result of the company's activities, including the use of	Material		GRI 305-2	Principle 8. Businesses should undertake initiatives to promote greater environmental	
Climate change	goods and services it produces		5.4.2.6. Fight against climate change	GRI 305-4	initiatives to promote greater environmental responsibility. Principle 9. Businesses should encourage the development and diffusion of environmentally friendly technologies. Principle 7. Businesses should support a precautionary approach to environmental challenges.	
	Measures adopted to adapt to the consequences of climate change;	Material		GRI 201-2		SDGs 3, 6, 7, 8, 11, 12, 13, 15
	milestones defined voluntarily to reduce	Material				
Protection of	Measures taken to preserve or restore biodiversity	Immaterial	5.4.2.7. Other aspects	Indicador no material		
biodiversity	Impact caused by activities or operations in protected areas	Immaterial	o.1.2.7. Other aspects	Indicador no material		
cial factors and the	ose in relation to staff					
	Total number and distribution of employees by gender, age, country and professional category	Material		GRI 2-27		
	Total number and distribution of contract types	Material] !	GRI 2-27		
	Annual average of permanent contracts, temporary contracts and part-time contracts by gender, age and professional category			GRI 2-27 GRI 405-1		
	Number of dismissals by gender age and professional category	Material		GRI 401-1		
Employment	Average remuneration and its evolution broken down by gender, age and professional category or equal value; salary gap, remuneration of the same or average positions in society,		5.4.1. Our people 5.4.1.1. Empoyment	GRI 405-2	elimination of discrimination in respect of	SDGs 3, 4, 5, 8 10, 16
	Average director remuneration, including variable remuneration, subsistence benefits, allowances, payments to long-term savings benefit systems and any other payment, broken down by gender	Material		GRI 405-1		
	Implementation of policies for the disconnection from work	Material			Principle 7. Businesses should support a precautionary approach to environmental challenges. Principle 6. Businesses should uphold the elimination of discrimination in respect of	
	Employees with disabilities	Material		GRI 405-1		



Content required under Law 11/2018 of December 28 Information required under Law 11/2018		Materiality	Section in report or document providing a response	Connection to GRI indicators	Principles of the Global Compact	Sustainable Development Goals*
Environmental m	atters					Guais
Organization of work	Organization of work time	Material	5.4.1.3. Work-life balance and flexible working arrangements		Principle 4. Businesses should uphold the elimination of all forms of forced and compulsory labor. Principle 5. Businesses should uphold the effective abolition of child labor.	SDGs 3, 4, 5, 8, 10, 16
	Number of hours of absence	Material		GRI 403-9		
	Measures aimed at facilitating a work/life balance being achieved and promoting joint responsibility between parents	Material		GRI 401-3		
Health and safety	Health and safety conditions in the workplace	Material	5.4.1.6. Health and wellbeing	GRI 403-1 GRI 403-4		
	Occupational accidents, in particular their frequency and severity, in addition to professional illnesses; broken down by gender	Material		GRI 403-9 GRI 403-10		
Social relations	Organization of the social dialog, including procedures for informing and consulting staff and negotiating with them	Material	5.4.1.2.Social relations	GRI 403-1	Principle 3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining. Principle 4. Businesses should uphold the elimination of all forms of forced and compulsory labor. Principle 5. Businesses should uphold the effective abolition of child labor.	
	Percentage of employees covered by collective bargaining agreements by country	Material		GRI 2-30		
	Balance of collective agreements, in particular in the field of occupational health and safety	Material		GRI 403-4		
				GRI 403-9		
Training	Policies implemented in the field of training	Material	5.4.1.4. Talent management and development	GRI 404-2	Principle 4. Businesses should uphold the elimination of all forms of forced and compulsory labor. Principle 5. Businesses should uphold the effective abolition of child labor. Principle 6. Businesses should uphold the elimination of discrimination in respect of employment and occupation	
				GRI 404-3		
	Total amount of hours training by professional categories	Material		GRI 404-1		



Content required	d under Law 11/2018 of December 28					
Information required under Law 11/2018		Materiality	Section in report or document providing a response	Connection to GRI indicators	Principles of the Global Compact	Sustainable Development Goals*
Environmental matters						
	Measures adopted to promote equal treatment and opportunities between men and women	Material	5.4.1.5. Diversity and equality	GRI 405-1	Principle 6. Businesses should uphold the elimination of discrimination in respect of employment and occupation	SDGs 3, 4, 5, 8, 10, 16
Equality	Equality plans (Chapter III of Organic Law 3/2007, of March 22, for the effective equality of men and women), measures adopted to promote employment, protocols against	Matarial				
	Integration and universal accessibility of people with disabilities	Material				
	Policies against all forms of discrimination and, as applicable, the management of diversity					
Respect for hum	an rights					
Application of due diligence procedures in relation to human rights; prevention of risks of human rights being violated and, as applicable, measures to mitigate, manage and repair possible abuses committed; reports of cases of human rights being violated; promotion and compliance with the provisions of the main conventions of the International Labor Organization in relation to respect for the freedom of association and the right to collective bargaining; the elimination of discrimination in employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labor		Material	5.3.4. Compliance and business ethics 5.3.5. Respect for Human Rights	GRI 2-23 GRI 202-2 GRI 406-1 GRI 407 GRI 408 GRI 409	Principle 1. Businesses should support and respect the protection of internationally proclaimed human rights. Principle 2. Businesses should make sure that they are not complicit in human rights abuses.	SDGs 5, 8, 10 16
Fighting corrupt	Fighting corruption and bribery					
Measures adopted to prevent corruption and bribery; measures to combat money laundering, donations to non-profit organizations and foundations.		Material	5.3.4.1 Fight against corruption and bribery 5.3.5. Respect for Human Rights 5.5.2. Social impact	GRI 2-26 GRI2-27 GRI 205-2 GRI 205-3 GRI 413-1; 406-1	Principle 10. Businesses should work against corruption in all its forms, including extortion and bribery.	SDGs 8, 16



Content required	under Law 11/2018 of December 28					
Information required under Law 11/2018		Materiality	Section in report or document providing a response	Connection to GRI indicators	Principles of the Global Compact	Sustainable Development Goals*
Information for s	Information for society					
- Corporate commitments to sustainable development: the impact of the company's activities on local development and employment; the impact of the company's activity on local populations and in the area; relations with the stakeholders in local communities and the different forms of dialog with them; association or sponsorship actions.		Material	5.5. Social Impact 5.5.1. Shared Value 5.5.2. Social Action	GRI 2-23 GRI2-29 GRI 2-28 GRI 413-1		SDGs 4, 5, 8, 10, 13, 16, 17
	inclusion of social, gender equality and environmental issues in the procurement policy	Material	5.4.3. Our value chain	GRI 2-6		
				GRI 308-1		
				GRI 204-1		SDGs 5, 8, 12, 13, 16
Outsourcing and suppliers				GRI 414-1		
	Consideration of environmental and social responsibility in relationships with suppliers and subcontractors	Material		GRI 308-2		
				GRI 414-2		
	Supervision and audit and results thereof	Material				
- Consumers: measures for the health and safety of consumers; complaint systems, claims received and their resolution.		Material	5.3.3 Protection of privacy and data security 5.5.3. Communication with our customers and users	GRI 418-1		SDGs 9, 16
Tax information: benefits obtained country by country; corporation tax paid and public subsidies received.		Material	5 6.3. Fiscal policy	GRI 201 GRI 207-4		SDGs 1, 8, 9, 17

^{*} Linking the SDGs and the GRI Standards, Last updated May