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eOs

Non-Financial Information Statement

EOS Spain, S.L. and Subsidiaries - 2023/24

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01 ●

**Basis for
Preparing
the NFIS**

Basis for Preparing the NFIS

The Directors of EOS Spain, S.L. (hereinafter EOS) have prepared this Non-Financial Information Statement (NFIS) in compliance with the requirements of Spanish Law 11/2018 of 28 December 2015, which amended the Spanish Commercial Code (Código de Comercio), the consolidated text of the Spanish Corporations Act (Ley de Sociedades de Capital) approved by Legislative Royal Decree 1/2010 of 2 July 2010 and Spanish Law 22/2015 of 20 July 2015 on the auditing of accounts, as regards non-financial information and diversity.

Furthermore, the guidelines on non-financial reporting of the European Commission (2017/1 215/01) derived from Directive 2014/95/EU have also been considered in its preparation.

The information on non-financial indicators presented in this document follows the guidelines set forth by the international

Sustainability Reporting Standards of the Global Reporting Initiative (GRI).

The purpose of this Non-Financial Information Statement is to provide the information needed to understand the evolution, results and situation of EOS Spain, S.L.U. (EOS Spain), and the impact of its activity with respect to, at least, environmental and social issues, human rights, anti-corruption and anti-bribery efforts, personnel, promotion of equal treatment and compliance with non-discrimination and disability rules.

This is an annual report and its scope takes in the data for EOS Spain for the period from 1 March 2023 to 29 February 2024 (FY-2023-24).

02.

Business Model

Business Model

Nature and business of the company **EOS Spain, S.L.**

EOS's business model is based on providing collection services for banks and leasing companies, telecommunications and other companies; realising the value of motor vehicles, searching for and locating debtors and research and information activities for credit ratings, the collection of debt and other claims (both in Spain and abroad) for the Company itself and for third parties, purchasing debt, granting of loans and such other activities as may be necessary or convenient for the pursuit of this activity activities (and without this being the Company's main business);

and activities recommended for credit protection and any activity that is necessary or appropriate for achieving the aforementioned objects of the Company. The provision of advisory and management services to other companies in its corporate group.

Business Model

Corporate Structure EOS Spain, S.L.

EOS Spain, S.L. is managed by two directors acting jointly, specifically:

- Mr Bent Mahnke
- Mr Sebastian Pollmer

The Directors delegate their powers to a Management Committee that is composed of four members:

- Mr Carlos Lorenzo Santos
- Mr Jorge Ortega García
- Mr José Miguel Vázquez Arcas
- Ms Marta Pereiro González



Business Model

Nature and Business of the company **Atram Asset I, S.L.U.**

On 8 November 2019 EOS acquired 100% of the shares in the company now called Atram Asset I, S.L.U.

That company's business model is based on generating income streams from the pursuit of the following activities:

1. Acquisition, holding, administration and disposal of real estate and movable assets obtained following or through auctions, judicial and non-judicial foreclosures, insolvency proceeding, bankruptcies, liquidations or under any other title, and, where applicable, the subsequent or simultaneous development, construction, alteration, refurbishment, sale, maintenance and operation of said assets, including non-finance leasing of all types of assets, properties and buildings.

2. Investment in real estate and movable assets, including subscribing, buying and selling, contributing, swapping, leasing, and operating them on its own behalf or for a third party, with authority to promote and participate in the formation, expansion and trading of all types of businesses and trading and industrial companies, and dispose of said investments.

3. Installation, assembly, repair, maintenance, purchase, sale and operation, including non-finance leasing, of all types of real estate and movable assets, industrial premises and units, installations, equipment and machinery, including electrical installations in general, and any type of transport and infrastructure.

4. Acquisition, non-finance leasing, encumbrance, disposal and operation of assets through administrative authorisations, sub-concessions and concessions awarded by public administrations.

5. Acquisition, holding, administration and disposal of credits and/or loans of any class and/or nature, holdings, titles and securities, involving real estate and movable assets and bonds and equities of all types of trading companies.

Business Model

Corporate Structure Atram Asset I, S.L.U.

The governing body of Atram Asset I, S.L.U. is a Board of Directors composed of the following members:

- Mr Carlos Lorenzo Santos
- Ms Marta Pereiro González
- Mr José Miguel Vázquez Arcas



Business Model

Nature and Business of the company **Atram Asset II, S.L.U.**

On 8 October 2020 EOS acquired 100% of the shares of the company currently called Atram Asset II, S.L.U.

That company's business model is based on generating income streams from the pursuit of the following activities:

1. The granting of mortgage credit and loans, in compliance with the provisions of Law 5/2019 of 15 March 2019 governing real estate financing agreements and its implementing regulations..

2. Extending mortgage credit and loans with deferred payment, in accordance with the provisions of Article 1 of Law 2/2009 of 31 March 2009 governing consumer lending and mortgages and brokerage services for loan.

3. The granting of mortgage credit or loans in general.

4. The acquisition, holding, administration and disposal of credits and/or loans of any class and/or nature, equity holdings and securities, involving real estate and movable assets and bonds and equities of all types of trading companies.

5. Acquisition, holding, administration and disposal of real estate and movable assets obtained following or through auctions, judicial and non-judicial foreclosures, insolvency proceeding, bankruptcies, liquidations or under any other title, and, where applicable, the subsequent or simultaneous development, construction, alteration, refurbishment, sale, maintenance and operation of said assets, including non-finance leasing of all types of assets, properties and buildings.

6. Investment in real estate assets, including subscribing, buying and selling, contributing, swapping, leasing, and operating them on its own behalf or for a third party, with authority to promote and participate in the formation, expansion and trading of all types of businesses and trading and industrial companies, and dispose of said investments.

7. Installation, assembly, repair, maintenance, purchase, sale and operation, including non-finance leasing, of all types of real estate and movable assets, industrial premises and units, installations, equipment and machinery, including electrical installations in general, and any type of transport and infrastructure.

Business Model

Corporate Structure Atram Asset II, S.L.U.

The governing body of Atram Asset II, S.L.U, consists of a Board of Directors composed of the following members:

- Mr Carlos Lorenzo Santos
- Ms Marta Pereiro González
- Mr José Miguel Vázquez Arcas



03.

Main Risks

Risk Management

Main risks associated with the activity

Anti-money Laundering Measures

The Anti-Money Laundering Manual includes this regulatory obligation, in addition to adopting the recommendations issued by international organisations, the Financial Action Task Force (FATF) and national (SEPBLAC) and international AML authorities.

Data Protection

Our *General Privacy and Data Protection Policy* establishes and disseminates the fundamental principles and basic and general rules that must guide the processing of personal data throughout the data life cycle, from collection and processing to the archiving and final disposal of the data, both internally and by those who act on our behalf.

Information Security

We regard information as an asset and its protection is a priority objective, guaranteeing at all times the confidentiality, integrity and availability of information, always in strict compliance with the legal and regulatory requirements that apply as well as with those to which our organisation subscribes.

Anticorruption and Bribery

We reiterate our utmost commitment to fighting corruption in all its forms, through our *Anti-Corruption Policy*, which details and develops the principles and plans contained in the *Code of Conduct* in order to regulate the criteria applicable to the prevention and, where appropriate, management of possible corruption offences, describing the requirements, controls and associated risks: bribery, fraud and conflicts of interest.

04.

**Materiality
Analysis**

Materiality Analysis

EOS places great importance on listening to its **stakeholders**, attending to their demands and needs and collaborating with them with the aim of advancing towards the sustainable development of our society.

All persons or groups who have a relationship with the Group, influence its activities, decisions and management systems are considered stakeholders by the company. The EOS Group thus regards as its main stakeholders its shareholders and investors, customers and employees.

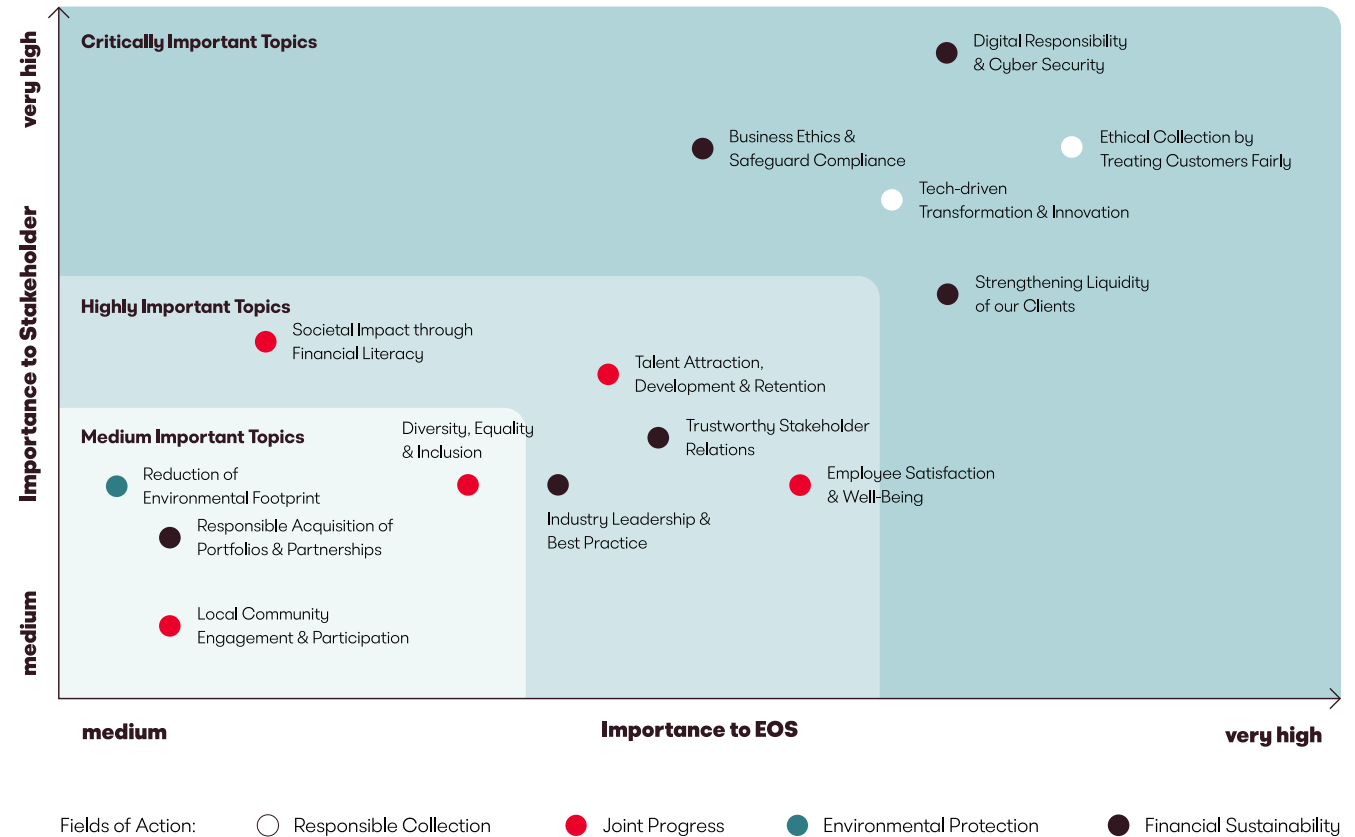
The process of identifying material issues and determining their scope is carried out in line with the recommendations contained in the **Global Reporting Initiative** standards and more specifically in the **GRI 101 standard: Foundation 2016**.

The identification of material issues takes into account, among other considerations, whether or not the Group can have an impact on those issues in the short, medium or long term.



Materiality Analysis

The result is a **materiality matrix** which reflects **14 material issues** depicted on the basis of their importance for internal and external stakeholders according to the values of the axes.



05.

**Due Diligence
Procedure**

Due Diligence Procedure

Purpose of internal control

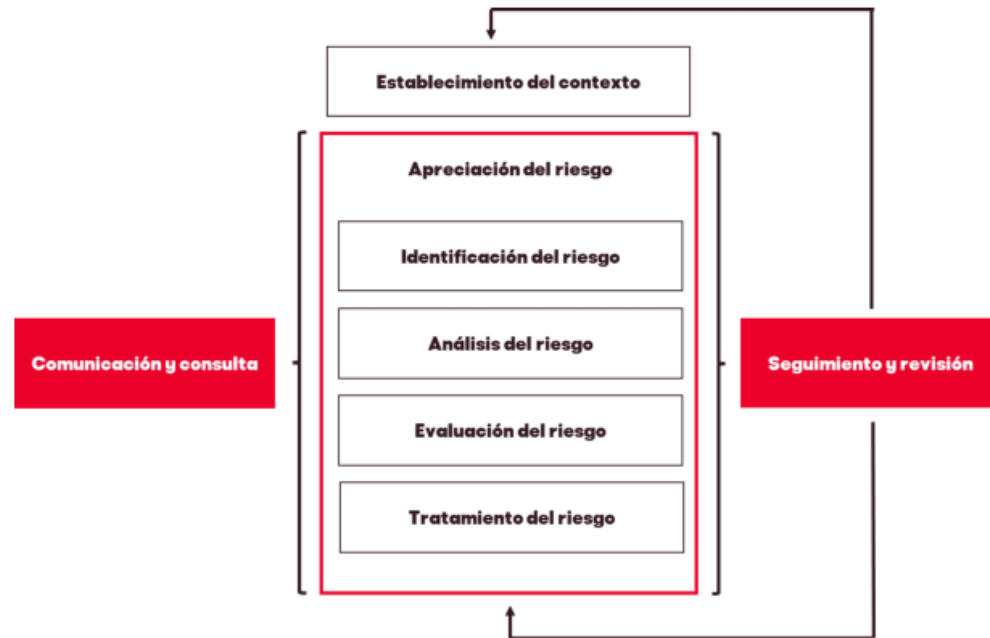
The internal control system (ICS) takes in all measures and controls introduced or implemented to address risks and must ensure that:

- The company's objectives are achieved, without its organisational and operational structure presenting vulnerabilities that could pose threats.
- Transparency and profitability of commercial operations are guaranteed.
- There is compliance with the company's legal and internal regulations.
- The financial reporting and information made available internally and externally are reliable, complete and up to date.
- Losses are avoided and assets are protected.



Due Diligence Procedure

Model for the risk management procedure. ISO 31000***



Due Diligence Procedure

First line of defence

All EOS Spain employees are responsible for conducting themselves in accordance with the rules and procedures in their respective functions. To ensure better coordination a risk manager will be appointed in each department according to the following criteria:

- The employees the manager may have in his or her charge.
- Greater command of operating processes and their management and coordination.
- Degree of confidence of the manager's team, allowing first-hand knowledge of risks and non-compliance.
- Possible employee fears to report risks or non-compliances to the Compliance Department and/or Management.



Due Diligence Procedure

Second line of defence (I)

I. Policies and Procedures

- Authorities and duties
- Antibribery / Anticorruption
- Preventing conflicts of interest
- Fraud prevention
- Financial recordkeeping
- Data protection
- Money laundering
- Relations with partners, suppliers and authorities
- Employee remuneration/training
- Personal protection equipment / Occupational safety and Health

II. Organisational Controls

- Company activity
- Accounting management
- Financing
- Segregation of duties
- Obtaining prior authorisations
- Control bodies and committees
- Archiving, preservation and disposal of information
- Supplier management

III. Process Controls

- Double-check systems
- Data Loss Prevention (DLP) systems to prevent leakage of confidential information
- Establishment of passwords
- Personnel selection
- Call management
- Collection/payment management
Portfolio purchases
- Approval of new projects and rollout of services
- Due diligence processes: Know your customer (KYC)

Due Diligence Procedure

Second line of defence (II)

IV. Detection Controls

- Whistleblowing channel
- KYC-money laundering
- Security breaches
- Claims management
- Orders from agencies, courts and other authorities

V. Reactive Controls

- Disciplinary proceedings
- Security breaches
- Business continuity plans
- Partner/employee investigation



Due Diligence Procedure

Third line of defence

The corporate internal audit unit is the last line of defence and forms part of the *GRC Committee*, to which all information is reported upon request.

Its function is to verify that all risks are being contemplated, addressed and managed appropriately, carrying out independent audits of the other two lines, as well as serving as liaison with the central divisions for risk management communication and planning at Group level.

Its functions also include requesting the second line to adopt the appropriate measures to achieve the charted objectives.



Reporting

All actions and reviews carried out will be monitored. As a result, periodic reports will be made at local and Group level so that a clear view of the risk situation can be obtained.

Due Diligence Procedure

Our **commitment (I)**

01. Know and **abide by this Code** and the rest of EOS Policies and Procedures.

02. Act in accordance with our principles and as **examples of ethical behaviour**.

03. Foster **two-way communication** and transparency, within the limits of confidentiality.

04. Make **objective decisions** related to the business, fulfilling our duties and functions.

05. Embrace the **importance of innovation and efficiency** in processes to drive the company's growth.

06. **Cooperate with colleagues, customers and stakeholders** to achieve the charted objectives.

Due Diligence Procedure

Our commitment (II)

07. Do not tolerate **improprieties**, helping to resolve them and reporting them to the competent bodies.

08. Comply with **laws, internal rules and procedures** related to our work.

09. Maintain proper conduct, including **wholesome appearance, dress and communication** with co-workers and third parties, projecting a professional image.

10. Make **responsible use of corporate resources**, keeping them in good condition and avoiding their misuse.

11. Conserve **information** properly, committing ourselves to the maintaining its **privacy and security**.

12. Cooperate with **authorities, agencies and courts** to assist in conflict resolution.

06.

**Corporate
Governance
Indicators**

Corporate Governance Indicators

Roles, responsibilities and authorities

The EOS organisation is designed to ensure application of the compliance policy, with the following roles and responsibilities:

Governing Body: responsible for ensuring compliance with the provisions of this Policy, delegating this function to the Compliance Officer.

Compliance Officer: provides advice, implements controls and verifies that the Compliance Management System (policies, protocols, procedures and controls) is appropriately updated and effective.

Management Committee: compliance leaders in their respective areas, projecting this commitment to middle management.

Compliance Advisor: advises and develops compliance measures, collaborates in updating risk maps and compliance and criminal risk prevention policies. Develops compliance communication and training materials.



Corporate Governance Indicators

Responsibility and compliance

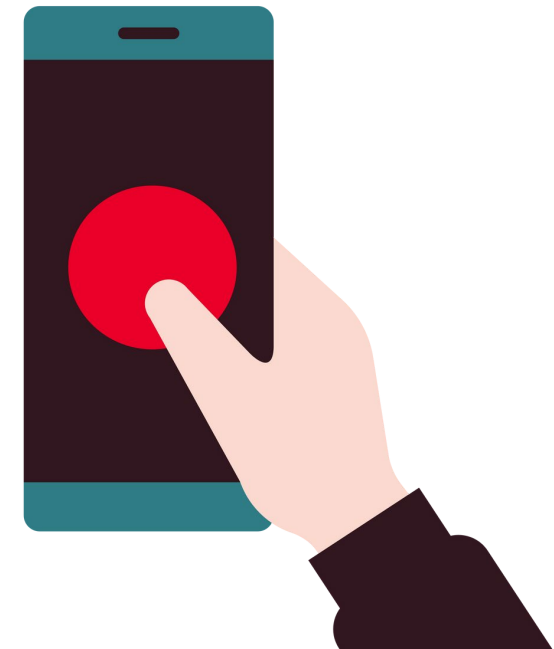
Our Compliance Management System aims to establish, develop, implement, evaluate, maintain and improve a system to prevent, detect and manage regulatory and criminal risks.

That system is based on analysing and evaluating the identified criminal risks, as reflected in the *Evaluation and Map of Criminal Risks*, which is constantly updated and adapted to the scenario in which we find ourselves. The results help determine the measures needed to manage the risks identified.

All processes and activities are subjected to a risk analysis based on the prior identification of the criminal offences under the Spanish Criminal Code that could imply liability for the organisation, incorporating the risk operations identified, all in accordance with the provisions of our *Crime Prevention and Detection Manual*.

This evaluation is also carried out periodically, without prejudice to reviews conducted in the event of any significant change in legislation, internal regulations or Group policy.

The purpose of the periodic assessments is to obtain a reliable, up-to-date picture of the status of risks within the organisation.



Corporate Governance Indicators

Strategy for managing risks

We operate in a sensitive business environment, where confidence in our integrity is essential to pursuing and developing a business in a manner that fulfils the applicable requirements. That is why our organisation's approach to risk management is premised on the following:

- Compliance with binding regulations: laws, regulations, permits, licences, orders, instructions, court rulings, agreements, etc.
- Unconstrained fairness and free competition in business dealings.
- Respectful interaction with employees and business partners.
- Sustainable behaviour with respect to the environment and responsibility towards people.

Our risk management system and Compliance Management System are grounded in the PDCA methodology (Plan, Do Check, Act).***

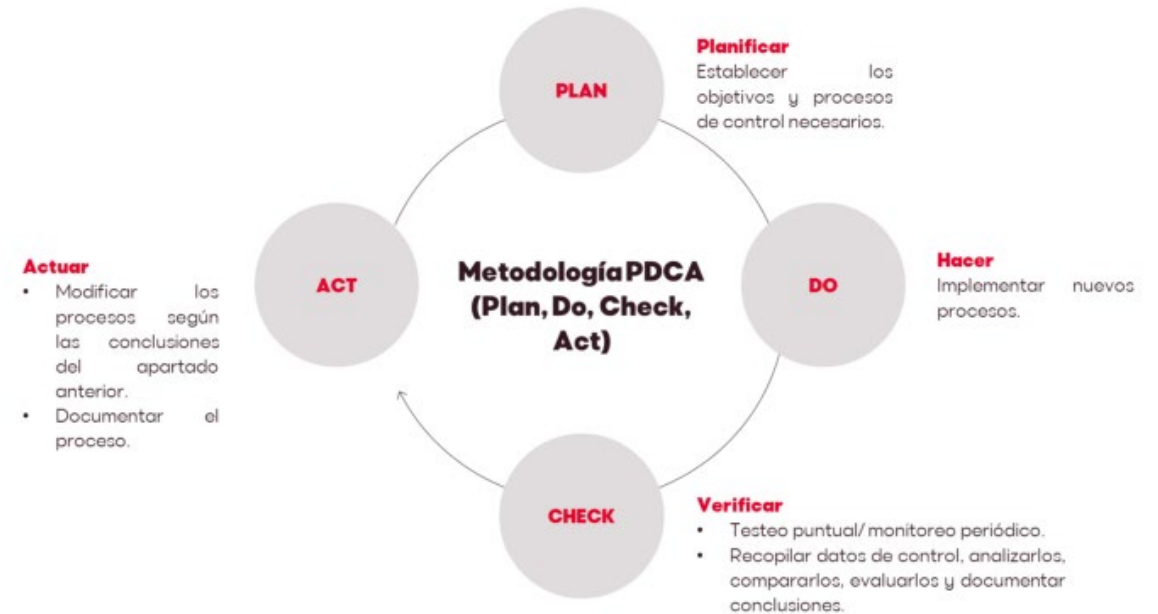


Ilustración 2. Modelo de metodología PDCA o círculo de Deming

Corporate Governance Indicators

Compliance Manual

The leadership and commitment of the management bodies and the responsibility and professionalism of the Compliance department are essential for the full development of this Compliance Management System, which charts these objectives:

- Reflect the company's identity and values, as well as conducts that are not permitted and are punishable.
- Prevent and detect any criminal wrongdoing inside the company.
- Avoid the commission of or incitement to engage in corrupt actions; bribes, illicit gifts, ...
- Review of third parties: suppliers, ...
- Set up a reporting channel for employees and related third parties.
- Adopt anti-money laundering measures.



Corporate Governance Indicators

Corporate governance

Some of the main feature of the Group's Management Body are described below:

Designation	Definition	Presentation and considerations	Index data
Directors	Directors of the company	Total number of directors	2
Meetings of the Governing Body	Meetings held during the year	Independent directors are non-executive, external and non-proprietary directors	0
Total remuneration of Directors	Directors' remuneration	Aggregate remuneration accrued to directors during the year	0 €
Gender diversity in the Management Body	Female members of the Management Body	Number of female members of the Management Body	0
Corruption and bribery	Corruption and bribery cases in the Management Body	Number of incidents of corruption and bribery within the Management Body in the year	0

07



**Social and
Employee Related
Issues**

Social and Employee Related Issues

We take care of our team

EOS personnel are an indispensable asset and a key ally in moving towards a more planet-friendly management.

At EOS we foster a people-centred culture based on trust and accountability, where talent thrives.

We are committed to attracting, developing and retaining talent, training and support programmes and a collaborative and flexible work environment.



Social and Employee Related Issues

How do we behave?



- We promote **conciliation measures**, we respect the free time, holidays and leaves of our colleagues.
- We properly manage **the personal data** of our colleagues, candidates and former employees.
- We call out and punish harassment of any member of EOS Spain or any person with whom we have dealings, encouraging **conducts rooted in integrity, honesty and respect**. We have an anti-harassment protocol.
- We implement **occupational risk prevention and health policies**, ensuring a safe working environment with video surveillance systems.
- We have first-aid equipment that is kept in good condition and regularly checked to provide **assistance and care** to our companions.
- We maintain **strict policies to protect** and defend our intellectual and industrial property and respect that of third parties.
- All IT systems, platforms, applications and databases that support our business are **used in a responsible, professional and secure manner**.
- We are **environmentally** responsible, promote digitalisation and the use of technology to reduce the use of paper.



- **We reject any and all discrimination** in the hiring of personnel and in their development, training, salary and other aspects of their employment relationship.
- **We do not accept dangerous conducts or actions that endanger** our own or other people's safety.
- We prohibit the **reproduction, plagiarising, distribution, use or installation** of registered products and solutions without prior written authorisation from the owner.

Social and Employee Related Issues

Whistleblowing channel

Any member of the company, as well as suppliers and even third parties who work with Mano Moneta EOS Spain **must report**, in good faith and without fear of retaliation, any irregularity, breach or unethical conduct carried out by an employee or officer of the entity in relation to this Code of Ethics, our policies, binding regulations or any other irregularity detected in the company.

The **anonymity of whistleblowers will always be guaranteed** and they will be protected from any possible consequences of the report.

However, if personal data is provided, appropriate measures will be taken to **protect the identity of the whistleblower and of the persons involved**.



Social and Employee Related Issues

Employees

The Group had a total workforce of 284 employees at the end of FY 2023-24. A full 95% of that number work under permanent contracts, demonstrating the high level of job stability in the Group.

We are a company committed to equal treatment and opportunities in the workplace, integrating gender perspective into all areas of the business through various initiatives such as the compensation audit to measure the pay gap or the protocol against harassment, to name just two.

Our historical tradition of female employment translates into the presence of 68.7% women in the total workforce at the end of FY 2023-24.



■ Hombres ■ Mujeres



Social and Employee Related Issues

Evolution and composition of the workforce

Compared to the 299 people that made up the Group's workforce in the previous FY 2022-23, this year the workforce has been reduced by 15 people.

The accompanying tables summarise this information:

By type of contract	Men	Women	Total
Permanent employees	83	190	273
Temporary employees	6	5	11
Total	89	195	284

By job category	Men	Women	Total
Executives and senior management	7	5	12
Technical and specialised managers	26	36	62
Technical and administrative staff	56	154	210
Total	89	195	284

Social and Employee Related Issues



EOS is a signatory to the United Nations Global Compact, the world's largest responsible corporate governance initiative. This means that EOS is committed to an inclusive and sustainable global economy that benefits all people, societies and markets, now and in the future.



In addition, EOS staff created in 2019 the first non-profit organisation of the EOS Group, the *finlit* foundation.



The aim of the foundation is to improve the financial literacy of children and young people as a way of contributing to reducing excessive personal debt. The first initiative, "*ManoMoneta*", is aimed at schoolchildren between the ages of 9 and 13.



08.

**Environmental
Issues**

Environmental Issues

Content and scope

In step with the global trend of the group, EOS recognises the importance of managing its environmental and social impact, as well as responsible procurement, as essential factors for creating sustainable value. The company is committed to integrating these considerations into its operations and services.

The objective is to address environmental risks and opportunities as effectively as possible, by gradually integrating sustainable and environmentally friendly processes into all company activities, and reducing direct and indirect environmental impacts through continuous improvement and monitoring.

Environmental conduct

The Group is committed to working in compliance with applicable environmental laws and to mitigating our climate footprint. This includes working towards the protection and conservation of the environment by following key objectives derived from our commitment to the United Nations Global Compact.

Based on industries linked to EOS's business activities, mostly purchase and management of non-performing loans, debt collection, financial services, etc., our main environmental risks are linked to our own energy consumption, purchasing decisions and respective emissions.

Environmental Issues

Environmental conduct

All EOS companies are committed to the following principles:

- Assess our own environmental risks.
- Recognise the importance of environmental responsibility and promote and support the use of sustainable natural resources, reducing waste and increasing recycling.
- Strive to achieve our environmental objectives through continuous improvement.
- Compliance with laws and regulations.
- Environmental awareness. Ensure that all employees and contractors understand the importance of compliance and are prepared for it.
- Consult relevant stakeholders on environmental issues caused by our core business operations.
- Foster a culture of environmental responsibility with a commitment to using natural resources and energy more efficiently.



09.



**Tax
Information**

Tax Information

During FY 2023-24 no public subsidies were received by any Group company.

The Group determines taxable net income in accordance with current tax legislation, which is generally calculated as the income for the period expressed in euros reconciled with certain items which, by their nature, are neither deductible nor taxable.

The following information is shown in relation to corporate income taxes paid by the company and subsidiaries:

Company	Corporate income taxes paid (€ 000s)
EOS Spain, S.L.	2,729.04
Atram Asset II, S.L.	731.56

Tax Information

The accompanying table gives information on pre-tax earnings of the Company and its subsidiaries for FY 2023-24:

Company	Earnings before corporate income tax (€ 000s)
EOS Spain, S.L.	-5,324
Atram Asset II, S.L.	-4,235
Atram Asset I, S.L.	8,726

10.

**Requirements of
Law 11/2018**

Requirements of Law 11/2018

Scope	Content	Related GRI standard	Page/Section where reported	Additional comments
Business Model	<p>Brief description of the Group's business model, which shall include:</p> <ol style="list-style-type: none"> 1. Its business environment 2. Its organisation and structure 3. Markets in which it operates 4. Its objectives and strategies 5. Main factors and trends that may affect its future performance 	102-1 / 102-2 / 102-3 / 102-4 / 102-6 / 102-7	6 a 12	-
Policies	<p>Description of the policies applied by the Group for these matters, which shall include:</p> <ol style="list-style-type: none"> 1. The due diligence procedures applied to identify, assess, prevent and mitigate significant risks and impacts 2. Verification and control procedures, including what measures have been taken 	103 Management approach for each area within the different dimensions	In each section	-
Risks	<p>The main risks related to these issues in the Group's activities and how the Group manages them, explaining the procedures used to detect and assess the risks in line with the national, European or international frameworks of reference for each topic. Information on the impacts that have been detected must be included</p>	102-15 / 102-30	13 a 14	-

Requirements of Law 11/2018

Scope	Content	Related GRI standard	Page/Section where reported	Additional comments
Environmental Issues	<ul style="list-style-type: none"> • Global Environment • Pollution • Circular Economy and Waste Prevention and Management • Sustainable use of resources • Climate change • Protection of biodiversity 	103 Management approach to the environmental dimension 301-1 / 301-3 / 302-1 / 302-4 / 303-4 / 303-5 / 307-1	40 a 42	-
Social and Employee Related Issues	<ul style="list-style-type: none"> • Employees • Equal opportunity • Employment trends • Occupational accidents and safety • Absenteeism 	103 Employment management approach 102-8 / 102-22 / 401-1 / 403-2 / 403-3 / 405-1	33 a 39	-
Human Rights	<ul style="list-style-type: none"> • Reporting of human rights infringements • Elimination of forced or compulsory labour • Elimination of discrimination in employment and on the job 	N/A	35	-
Corruption and Bribery	Measures taken to prevent corruption and bribery	103 Anti-corruption management approach 102-16	18 a 26	-
Other significant information	Corporate Governance Tax information	102-18 / 102-20 103 Economic management approach	27 a 32 43 a 45	-



EOS.
Changing finances
for the better.



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