

ASOCIACIÓN ECOEMBES COMERCIALES
FISCAL POLICY



ecoembes

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On December 11, 2025, the Board of Directors of the **Asociación Ecoembes Comerciales** (hereinafter "Ecoembes Comerciales" or "the Association") approved this Fiscal Policy, which aims to set forth the Association's corporate governance system and its general commitment to compliance through the implementation and development of good practices in tax matters, with the ultimate aim of complying with its fiscal obligations and current legislation on the matter, as well as supporting its long-term strategy, thereby avoiding inefficiencies and preventing and detecting risks of non-compliance in the execution of its decisions.

1. Context and current regulatory framework

Ecoembes Comerciales was created as a Collective Extended Producer Responsibility Scheme (hereinafter "EPR"); that is, an entity that helps manufacturers meet their legal obligations for waste management under Extended Producer Responsibility (EPR) systems. in accordance with Law 7/2022 of April 8 on waste and contaminated soil for a circular economy ("LERE").

In particular, the Association aims to enter into agreements with Spanish Public Administrations, final holders, and private managers, to carry out the direct management of the waste generated, to finance and/or organize the selective collection of commercial waste and its subsequent separation by materials, in order to be recycled and recovered, all in compliance with and within the framework of the aforementioned regulations.

Ecoembes Comerciales was constituted as an association to provide its members and affiliates with complete flexibility to join or withdraw from it.



The Association has entrusted Ecoembes Entidad Administradora, S.L.U. (hereinafter "Ecoembes EA") with the management of the PRO; with Ecoembes EA undertaking to carry out its functions under the direction of the Association, as established in the service provision contract signed between the Association and Ecoembes EA on November 12, 2024.

Within the framework of its activity, the Association pays corporate tax. Additionally, in accordance with current legislation, Ecoembes Comerciales applies a reduced VAT rate and Canary Islands general indirect tax to its principal services.<

2. Scope of application

This Policy applies to all personnel, employees, and managers who perform their duties in relation to Ecoembes Comerciales. Likewise, the members of the Association's Board of Directors are also bound by the principles established in this Policy.

Likewise, the Association, as part of the contract through which, under its direction, Ecoembes Administradora provides its PRO management services, will instruct the latter to apply these principles in said management, and will ensure that Ecoembes Administradora approves an equivalent policy with the principles set out in the following section.

The Board of Directors will ensure compliance by the Association with the principles set out in this Policy.

3. Principles of action and good practices in tax matters

Ecoembes Comerciales' action in tax matters is part of a model of responsible governance and corporate sustainability aligned with ethical values, regulatory compliance, and the creation of long-term value for society, with these characterizing it, in accordance with its legal nature.

This action will be guided by three fundamental principles: (i) compliance with tax obligations based on a sound interpretation of the law, (ii) the prevention and reduction of tax risks and (iii) transparency and collaboration in its relations with the Tax Administration.

In particular, in its actions with tax implications, the Association will observe the following principles and practices:

- Compliance with the current regulations and tax obligations that are applicable, and the payment of those taxes that are legally enforceable.
- The adoption of tax decisions based on a reasonable and well-founded interpretation of the regulations and in accordance with the legal nature, purpose, and economic activity carried out.
- The prevention, reduction and proper management of tax risks.
- The renunciation of opaque structures, understood as those designed to prevent or hinder competent tax authorities from identifying the ultimate person responsible for the activities or the final owner of the assets or rights involved.

- Refraining from using artificial structures lacking valid business justification, or without real economic substance, or that are not properly related to the activity, whose sole or main purpose is to obtain undue tax advantages, contrary to the spirit of the tax regulations in force.
- Refusing to carry out operations through instrumental entities domiciled in non-cooperative jurisdictions or tax havens, unless there is a legitimate economic reason of a non-tax nature for acting in those jurisdictions.
- Carrying out transactions between related entities under market conditions, complying with the tax regulations on related-party transactions.
- The promotion, together with the business entities to which the Association has access, of the improvement of tax regulations and the actions of the Tax Administration to promote competitiveness and sustainable economic development.

In this way, Ecoembes Comerciales will adopt a prudent tax risk profile, rejecting any planning or structure that may be classified as aggressive, artificial or contrary to the spirit and purpose of tax regulations. It will only assume risks inherent to the ordinary course of business that, following technical-legal evaluation, result from a well-founded and reasonable interpretation of regulations, are duly documented, and have been approved by the competent governing bodies

4. Ecoembes Comerciales' Relationships with the Tax Administration

The Association will maintain a relationship with the Tax Administrations based on the principles of transparency, legality, good faith, mutual loyalty, professionalism and collaboration, adopting the following practices:

- (i) In the exercise of its commitment to transparency, Ecoembes Comerciales will actively collaborate with the tax authorities in their verification and inspection actions, providing the documentation and information that is required to the extent necessary and within the deadlines stipulated by law.
- (ii) The Association will keep its accounting and tax records updated and accessible at all times, so that any request can be efficiently responded to in a timely manner.
- (iii) The Association undertakes to communicate clearly, completely, and promptly to the competent Tax Authority bodies all relevant matters of which it has knowledge in order to process the corresponding files as appropriate, and to promote, insofar as reasonably possible and without compromising sound business management, agreements and settlements during proceedings.
- (iv) However, in the event of a disagreement with the Administration, Ecoembes Comerciales considers that this is legitimate in a state governed by the rule of law and therefore, in the event of a well-founded disagreement, reserves the right to lodge appeals or take any procedural measures it deems appropriate in defense of its interests.
- (v) Ecoembes Comerciales will actively collaborate with the Tax Administration to detect and identify systemic risks and eliminate fraudulent tax practices that

come to its attention within its sector of activity, provided this does not breach its confidentiality obligations to third parties.

5. Follow-up and control

Ecoembes Comerciales' competent bodies, specifically, its Board of Directors, through its Chairman and Managing Director, with the technical support of the Finance Department, shall adopt the control mechanisms necessary to ensure compliance with the principles and commitments set out in sections 3 and 4 of this Policy.

In order to guarantee compliance with these principles and commitments, Ecoembes Comerciales will implement, through its Finance Department, specific annual training and updating programs in tax matters aimed at those employees and managers involved in tax management. These training actions will include, among other contents, the relevant regulatory developments, internal control and reporting procedures, and the principles established in this Policy. In addition, continuous awareness will be promoted through newsletters, internal seminars and updating sessions, in order to strengthen a culture of integrity, transparency and fiscal prudence throughout the organization.

The Finance Department shall report to the Board of Directors on the degree of compliance with this Tax Policy prior to the approval of the annual financial statements. Likewise, in the event of operations or matters that, given their significant impact, must be submitted to the Board of Directors for approval, the Finance Department will report on their tax consequences when they constitute a relevant



factor, in order to facilitate informed decision-making consistent with the principles of this Policy.

This Policy will be subject to periodic review, at least every two years or earlier if so advised by relevant regulatory changes, changes in the structure or organization of the Association, or any other circumstance that makes it necessary.

6. Ethical channel

Ecoembes Comerciales has an Internal Information System (IIS/SIL), in accordance with the provisions of Law 2/2023, of February 20, regulating the protection of people who report regulatory violations and the fight against corruption. This system is governed by the following operational and management principles: effectiveness, accessibility, proportionality, confidentiality, presumed innocence, the right to honor, the prohibition of reprisals, data protection, independence and good faith.

The SIL features an ethical communications channel, under the Integrity Commission, in which, among other aspects, it is possible to report both possible breaches and pose questions related to tax matters. This channel is open, among others, to all members of the Association (employees, managers and government bodies), their union representatives, and third parties contractually or professionally related to Ecoembes Comerciales.



7. Approval, validity and dissemination

This Policy, as well as its successive modifications, will enter into force the day after its approval by the Board of Directors of Ecoembes Comerciales.

This Policy will be made known to all employees, managers and administrators who perform their functions in relation to the Association, via email, and will also be made available on the Ecoembes Comerciales intranet.

Regarding external communication, the Policy will be published on Ecoembes' corporate website and on its Transparency Portal, in the Governance section.

December 11, 2025