LAU LAGUN BEARINGS SL

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
Read full terms of disclosure

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Contents

C14. SME Introduction

(14.1) In which language are you submitting your response?

Select from:

☑ English

(14.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☑ EUR

(14.3) Provide an overview and introduction to your organization.

(14.3.1) Organization type

Select from:

☑ Privately owned organization

(14.3.2) Description of organization

Laulagun Bearings has been designing, manufacturing and marketing high-quality large bearings as well as slewing rings since 1973 to respond to the high technical and quality requirements of international companies active in various industries and markets. Thus, the company is present in the most competitive and demanding markets worldwide, exporting nearly 80% of its production. Laulagun Bearings has two production sites in Spain, a production site in India and a R&D centre with testing facilities. Each of Laulagun production sites features all the technology and staff that is necessary to respond in the shortest possible time to orders for large bearings and slewing rings, mainly for wind sector, but also for others like wind service (spare parts), elevation and marine. Laulagun Bearings' products are exported from these facilities to the most demanding and competitive markets worldwide.
[Fixed row]

(14.4) State the end date of the year for which you are reporting data.

	End date of reporting year	Alignment of this reporting period with your financial reporting period
	12/30/2023	*Select from:* ☑ Yes

[Fixed row]

(14.5) How do the entities you are including in your CDP response compare to those included in your financial statements?

	Are the entities included in your CDP response the same as those included used in your financial statements?
	Select from: ☑ Yes, the entities included in my CDP disclosure are the same as those included in my financial statements

[Fixed row]

(14.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

	Does your organization use this unique identifier?	Provide your unique identifier
LEI number	*Select from:* ☑ Yes	*959800KMHC6MR9H8G395*

[Add row]

(14.7) Select the countries/areas in which the entities reported in 14.5 are based and/or conduct business.

Select all that apply

☑ India

☑ Spain

C15. SME Identification, Assessment and Management of Risks and Opportunities

(15.1) Does your organization have a process for identifying, assessing, and managing environmental risks and opportunities?

(15.1.1) Process in place

Select from:

☑ Yes

(15.1.2) Risks and/or opportunities evaluated in this process

Select from:

☑ Risks only

(15.1.3) Frequency of assessment

Select from:

☑ Annually

(15.1.4) Please explain the process

Our organization manages environmental risks through a certified Environmental Management System based on ISO 14001:2015 (multisite certification covering our plants in Euskadi and India). The core of this system is the structured identification, evaluation and control of environmental aspects and impacts, which serves as our main risk assessment process. Identification. Each year, and whenever significant changes occur, we systematically identify all environmental aspects related to our activities, products and services, applying a life-cycle perspective. This covers upstream (supply of raw materials, packaging, logistics), our direct operations (energy use, emissions, water discharges, waste generation, chemical use, mobility of employees, and emergency scenarios), and downstream impacts (product shipping, packaging, end-of-life). Both normal, abnormal and emergency operating conditions are considered. Data collection. We compile quantitative data for energy and raw material consumption, emissions (regulated pollutants and greenhouse gases), water and wastewater, waste generation and recycling, employee mobility, and any environmental incidents. These data are normalized against production volumes and compared to historical averages in order to highlight trends and potential deterioration. Emergency events and regulatory measurement results (e.g., APCA reports) are also included in the dataset. Evaluation. Risks are evaluated following our documented procedure. A scoring system determines significance: Any aspect operating above 90% of its legal limit, or associated with an environmental nonconformity or emergency, is automatically classified as significant. Other aspects are evaluated based on quantitative magnitude and trends. The outcome is an annually updated register of significant environmental risks. Control and action planning. For each significant risk, mitigation measures are defined and responsibilities

assigned. Actions follow a hierarchy of control: elimination or reduction at source (e.g., material substitution, process optimization), engineering and operational controls (e.g., containment systems, preventive maintenance), and organizational measures (training, awareness, emergency preparedness). Emergency scenarios (such as spills, fire or chemical releases) are specifically addressed through contingency plans and regular drills. Monitoring and review. Significant risks are monitored via indicators (e.g., energy and fuel use, emissions, water withdrawal, waste and recycling rates, mobility impacts, spill incidents, compliance status). Performance is reviewed annually during the Management Review and through internal audits. Nonconformities and incidents trigger root-cause analysis and corrective actions. The register is updated accordingly. Governance. The QHSE department coordinates the risk assessment process, while department managers are responsible for implementing controls in their areas. Results and priorities are reported to top management, which validates resource allocation and improvement programs. Scope and limitations. Our process is now primarily focused on identifying and mitigating environmental risks in line with ISO 14001. We do not yet conduct a systematic evaluation of environmental opportunities. When opportunities are identified (e.g., through energy efficiency projects), they are managed on a case-by-case basis, but they are not yet integrated into a formal assessment framework.
[Fixed row]

C16. SME Disclosure of Risks and Opportunities

(16.1) Are you aware of any risks created by environmental issues which have had a substantive effect on your organization in the reporting year or may in the future?

	Environmental risks identified
Climate change	*Select from:* ☑ Yes, both in direct operations (our own operations) and upstream/downstream value chain (our suppliers, distributors, and customers)

[Fixed row]

(16.1.1) Provide details of the risks created by environmental issues which have had a substantive effect on your organization in the reporting year or may in the future.

Climate change

(16.1.1.1) Risk identifier

Select from:
☑ Risk1

(16.1.1.3) Risk type and primary source of the environmental risk

Market
☑ Increased cost of raw materials

(16.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Upstream value chain (suppliers)

(16.1.1.5) Country/area where the risk occurs

Select all that apply

☑ India

☑ Spain

(16.1.1.7) Organization-specific description of risk

Volatility of electricity and natural gas prices and the strengthening of carbon pricing schemes may materially increase operating costs. Pass-through of electricity emission factors, taxes or carbon prices, and potential charges on carbon-intensive inputs from suppliers could affect margins and require efficiency investments and PPA/hedging.

(16.1.1.8) Primary financial effect of the risk

Select from:

☑ Increased capital expenditures

(16.1.1.9) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(16.1.1.10) Likelihood of the risk having an effect within the anticipated time horizons

Select from:

☑ Likely (66–100%)

(16.1.1.11) Magnitude

Select from:

☑ Medium-high

(16.1.1.12) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(16.1.1.13) Potential financial effect figure - minimum (currency)

45000

(16.1.1.14) Potential financial effect figure– maximum (currency)

90000

(16.1.1.15) Explanation of financial effect figure

We estimate the potential annual financial effect at €90,000. This reflects a 10% price increase applied to our current electricity and fuel spend in Euskadi (~€900,000/y, 2025 estimate). The driver is energy market volatility and potential pass-through of carbon pricing or taxes by utilities and suppliers. Even though we contract 100% renewable electricity (as reflected in our Scorecard), renewable tariffs and guarantees of origin can also increase, and suppliers may embed carbon costs in their prices. This magnitude would directly affect operating margins unless offset by efficiency and risk-hedging actions.

(16.1.1.16) Primary response to risk

Compliance, monitoring and targets

☑ Implementation of environmental best practices in direct operations

(16.1.1.17) Cost of response to risk

125000

(16.1.1.18) Explanation of cost calculation

€35k for energy audit + metering upgrades, €70k for quick-payback efficiency projects (compressors, motors/VFDs, lighting/fans), €15k for PPA/hedging advisory and contract set-up. Annual OPEX ~€5k for M&V, contract monitoring and certificate administration. (Scope and figures are consistent with our ISO 14001 improvement planning cycle.)

(16.1.1.19) Description of response

We will (i) implement an ISO-14001-based energy review to prioritise high-ROI measures; (ii) install sub-metering for key lines/utilities; (iii) execute efficiency projects (compressed air leakage programme, VFDs for fans/pumps, lighting optimisation); and (iv) improve electricity procurement with medium-term contracts or a PPA/hedging structure to stabilise prices. KPIs and results are reviewed in Management Review and internal audits.

Climate change

(16.1.1.1) Risk identifier

Select from:

☑ Risk2

(16.1.1.3) Risk type and primary source of the environmental risk

Acute physical (short term, specific events that change the state of nature)

☑ Heavy precipitation (rail, hail, snow/ice)

(16.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations (our own operations)

(16.1.1.5) Country/area where the risk occurs

Select all that apply

☑ India

☑ Spain

(16.1.1.7) Organization-specific description of risk

Severe storms and flooding can disrupt inbound steel/components, damage infrastructure, or stop production temporarily. Consequences include overtime, expedited freight, scrap risk, and potential safety incidents, with direct revenue and cost impacts.

(16.1.1.8) Primary financial effect of the risk

Select from:

☑ Disruption in production capacity

(16.1.1.9) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(16.1.1.10) Likelihood of the risk having an effect within the anticipated time horizons

Select from:

☑ About as likely as not (33–66%)

(16.1.1.11) Magnitude

Select from:

☑ Medium

(16.1.1.12) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(16.1.1.13) Potential financial effect figure - minimum (currency)

100000

(16.1.1.14) Potential financial effect figure– maximum (currency)

150000

(16.1.1.15) Explanation of financial effect figure

We model a €100,000 impact for a single event causing 1–2 days of disruption. The figure combines idle labour, expedited freight for critical steel/components, potential scrap/rework, and minor site repairs. While we have not experienced recent shutdowns, increasing storm intensity and localised flooding can affect inbound logistics and site access in both Euskadi (Oria river basin) and Chennai region, creating acute costs and delivery penalties. The amount represents inherent risk prior to mitigation (business continuity and site drainage improvements).

(16.1.1.16) Primary response to risk

Policies and plans

☑ Amend the Business Continuity Plan

(16.1.1.17) Cost of response to risk

63000

(16.1.1.18) Explanation of cost calculation

€20k for a business impact analysis (BIA), continuity plan and drills; €25k for drainage/roof maintenance and portable pumping capacity; €10k for critical spares; €5k for dual-routing with key forwarders. OPEX ~€3k/y for drills and preventive maintenance.

(16.1.1.19) Description of response

Establish and test a site-level Business Continuity Plan covering flood/storm scenarios; upgrade drainage and roof maintenance; maintain portable pumps and emergency materials; secure alternate logistics routes and dual suppliers for vulnerable inputs; include weather triggers and communication trees. Effectiveness is verified through drills and ISO-audit follow-up.

Climate change

(16.1.1.1) Risk identifier

Select from:

☑ Risk3

(16.1.1.3) Risk type and primary source of the environmental risk

Chronic physical (gradual changes to the state of nature)

☑ Heat stress

(16.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations (our own operations)

(16.1.1.5) Country/area where the risk occurs

Select all that apply

☑ India

☑ Spain

(16.1.1.7) Organization-specific description of risk

Higher average temperatures increase cooling needs and reduce labor productivity during heat waves. Potential water restrictions or lower availability for industrial use could constrain operations and raise costs for cooling and sanitation.

(16.1.1.8) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(16.1.1.9) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Long-term

(16.1.1.10) Likelihood of the risk having an effect within the anticipated time horizons

Select from:

☑ Likely (66–100%)

(16.1.1.11) Magnitude

Select from:

☑ Medium

(16.1.1.12) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(16.1.1.13) Potential financial effect figure - minimum (currency)

20000

(16.1.1.14) Potential financial effect figure– maximum (currency)

50000

(16.1.1.15) Explanation of financial effect figure

We estimate €35,000 in heat-wave years, from productivity impacts (reduced work-rate during peak heat), temporary cooling equipment and hydration/PPE measures, and potential water procurement surcharges. Our Scorecard shows ~29,000 m³ annual water use in Euskadi; water restrictions or supply interruptions could raise costs for cooling and sanitation. Although we haven't had heat-related shutdowns, heat waves are becoming longer, increasing the likelihood of overtime, micro-breaks and comfort cooling rentals.

(16.1.1.16) Primary response to risk

Engagement

☑ Engage with trade unions

(16.1.1.17) Cost of response to risk

37000

(16.1.1.18) Explanation of cost calculation

€18k for ventilation fans/air movers and shading, €7k for reflective paint in hotspots, €5k for water-saving fixtures and meters. Annual OPEX: ~€7k for hydration/PPE, maintenance and seasonal cooling rentals if required.

(16.1.1.19) Description of response

Deploy a Heat Stress Plan: scheduling heavy tasks outside peak hours, extra hydration/micro-breaks, local ventilation and shading, reflective coatings on selected areas, water-efficiency actions and contingency for temporary cooling. Include heat-index triggers and toolbox talks under ISO 14001 operational control and emergency preparedness.

Climate change

(16.1.1.1) Risk identifier

Select from:

☑ Risk4

(16.1.1.3) Risk type and primary source of the environmental risk

Policy

☑ Changes to national legislation

(16.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations (our own operations)

(16.1.1.5) Country/area where the risk occurs

Select all that apply

☑ India

☑ Spain

(16.1.1.7) Organization-specific description of risk

Stricter air emissions and wastewater discharge limits and more stringent enforcement can increase monitoring and treatment costs. Exceedances could lead to fines or temporary shutdowns, especially for aspects already close to legal thresholds.

(16.1.1.8) Primary financial effect of the risk

Select from:

☑ Increased capital expenditures

(16.1.1.9) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(16.1.1.10) Likelihood of the risk having an effect within the anticipated time horizons

Select from:

☑ More likely than not (50–100%)

(16.1.1.11) Magnitude

Select from:

☑ Medium

(16.1.1.12) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(16.1.1.13) Potential financial effect figure - minimum (currency)

100000

(16.1.1.14) Potential financial effect figure– maximum (currency)

200000

(16.1.1.15) Explanation of financial effect figure

Potential impact €200,000 combining (i) CAPEX to upgrade air/wastewater controls and continuous monitoring, and (ii) potential penalties or enforced downtime if limits are tightened and exceeded. Our ISO 14001 procedure classifies aspects as significant when close to legal thresholds or when incidents occur, which means proactive upgrades are prudent to avoid non-compliance. Amount represents the cost of an upgrade project plus contingency for enforcement actions in Spain/India.

(16.1.1.16) Primary response to risk

Policies and plans

☑ Improve alignment of public policy influencing activity with environmental commitments

(16.1.1.17) Cost of response to risk

170000

(16.1.1.18) Explanation of cost calculation

€120k for WWTP/air abatement improvements and CEMS/AMS upgrades, €20k for laboratory/third-party monitoring, €20k for engineering & permits. OPEX ~€10k/y for calibrations, external sampling and reporting.

(16.1.1.19) Description of response

Implement compliance roadmap: regulatory watch, gap assessment vs. emerging limits, upgrade of treatment/abatement and on-line monitoring, tighter operational controls and training, and periodic third-party sampling. Track “near-limit” aspects and corrective actions in the significant aspects register and Management Review.

Climate change

(16.1.1.1) Risk identifier

Select from:

☑ Risk5

(16.1.1.3) Risk type and primary source of the environmental risk

Market

☑ Changing customer behavior

(16.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Downstream value chain (distributors or customers)

(16.1.1.5) Country/area where the risk occurs

Select all that apply

☑ India

☑ Spain

(16.1.1.7) Organization-specific description of risk

Key customers like Vestas, SGRE, Acciona Energía, Iberdrola... request low carbon footprint and good environmental performance. Non-compliance with these requirements could suppose fewer possibilities in auctions or even contractual penalties.

(16.1.1.8) Primary financial effect of the risk

Select from:

☑ Decreased revenues due to reduced demand for products and services

(16.1.1.9) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(16.1.1.10) Likelihood of the risk having an effect within the anticipated time horizons

Select from:

☑ Likely (66–100%)

(16.1.1.11) Magnitude

Select from:

☑ High

(16.1.1.12) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(16.1.1.13) Potential financial effect figure - minimum (currency)

1000000

(16.1.1.14) Potential financial effect figure– maximum (currency)

1500000

(16.1.1.15) Explanation of financial effect figure

We estimate €1,500,000 of revenue at risk if we fail to meet customer ESG requirements (low-carbon energy, Scope 1–3 transparency, material traceability, circularity). Large wind OEMs/utilities increasingly use ESG filters in tenders. Non-alignment can reduce win rates or require price concessions. The figure represents a plausible value of tenders/renewals at risk in a year given our customer base; it is an inherent risk used for planning rather than an observed loss.

(16.1.1.16) Primary response to risk

Engagement

☑ Engage with customers

(16.1.1.17) Cost of response to risk

95000

(16.1.1.18) Explanation of cost calculation

€40k for LCA/EPD development for key product families, €20k supplier ESG audits/traceability pilots, €20k data systems & customer portals. Ongoing €15k/y for data updates, verifications and ESG reporting support.

(16.1.1.19) Description of response

Build a customer-aligned decarbonization package: maintain 100% renewable electricity, develop LCAs/EPDs for bearings, expand supplier code & ESG due diligence (steel, transport, packaging), and publish product/environmental data to customer portals. Integrate KPIs in ISO 14001 objectives and Management Review, and use tender feedback to refine actions.

Climate change

(16.1.1.1) Risk identifier

Select from:

☑ Risk6

(16.1.1.3) Risk type and primary source of the environmental risk

Market

☑ Increased cost of raw materials

(16.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Upstream value chain (suppliers)

(16.1.1.5) Country/area where the risk occurs

Select all that apply

☑ India

☑ Spain

(16.1.1.7) Organization-specific description of risk

As steel, packaging or transport suppliers implement their own climate strategies, input costs are likely to rise or certain carbon intensive materials are likely to become less available. This can hit raw material and logistics costs.

(16.1.1.8) Primary financial effect of the risk

Select from:

☑ Increased direct costs

(16.1.1.9) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(16.1.1.10) Likelihood of the risk having an effect within the anticipated time horizons

Select from:

☑ More likely than not (50–100%)

(16.1.1.11) Magnitude

Select from:

☑ Medium

(16.1.1.12) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(16.1.1.13) Potential financial effect figure - minimum (currency)

100000

(16.1.1.14) Potential financial effect figure– maximum (currency)

200000

(16.1.1.15) Explanation of financial effect figure

We set a planning figure of €150,000 for potential annual cost uplift due to supplier decarbonization (e.g., steel with lower embedded carbon, recycled content, greener transport) and associated surcharges. As upstream actors internalise carbon and energy costs, they may pass through premiums. The estimate represents a 2–3% uplift across a subset of critical purchases and logistics. It is used for planning and supplier dialogues; the actual impact will depend on contract timing and market conditions.

(16.1.1.16) Primary response to risk

Engagement

☑ Engage with suppliers

(16.1.1.17) Cost of response to risk

35000

(16.1.1.18) Explanation of cost calculation

€15k for supplier assessments and audits, €10k for trials/pilots of low-carbon steel/packaging, €10k for contract/market intelligence support (including CBAM/traceability requirements).

(16.1.1.19) Description of response

Deploy supplier engagement focused on steel, packaging and logistics: ESG self-assessments, audits and corrective plans; include GHG data/traceability clauses; run trials of lower-carbon inputs; and align contracts to indexed surcharges with transparency. Integrate results in the ISO 14001 life-cycle perspective and significant aspects review, updating our register annually.
[Add row]

(16.3) Are you aware of any opportunities created by environmental issues which have had a substantive effect on your organization in the reporting year or may in the future?

	Environmental opportunities identified
Climate change	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized

[Fixed row]

(16.3.1) Provide details of the opportunities created by environmental issues which have had a substantive effect on your organization in the reporting year or may in the future.

Climate change

(16.3.1.1) Opportunity identifier

Select from:

☑ Opp5

(16.3.1.3) Opportunity type and primary source

Energy source

☑ Use of low-carbon energy sources

(16.3.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations (our own operations)

(16.3.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Spain

(16.3.1.7) Organization specific description

Natural gas installation in Olaberria plant (2025)

(16.3.1.8) Primary financial effect of the opportunity

Select from:
☑ Reduced direct costs

(16.3.1.9) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply
☑ Medium-term

(16.3.1.10) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:
☑ Very likely (90–100%)

(16.3.1.11) Magnitude

Select from:
☑ Medium

Climate change

(16.3.1.1) Opportunity identifier

Select from:
☑ Opp6

(16.3.1.3) Opportunity type and primary source

Energy source

☑ Use of renewable energy sources

(16.3.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations (our own operations)

(16.3.1.5) Country/area where the opportunity occurs

Select all that apply

☑ India

(16.3.1.7) Organization specific description

Electricity coming from solar source

(16.3.1.8) Primary financial effect of the opportunity

Select from:

☑ Reduced direct costs

(16.3.1.9) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(16.3.1.10) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Very likely (90–100%)

(16.3.1.11) Magnitude

Select from:

☑ Medium-high

Climate change

(16.3.1.1) Opportunity identifier

Select from:

☑ Opp1

(16.3.1.3) Opportunity type and primary source

Resource efficiency

☑ Increased efficiency of production and/or distribution processes

(16.3.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations (our own operations)

(16.3.1.5) Country/area where the opportunity occurs

Select all that apply

☑ India

☑ Spain

(16.3.1.7) Organization specific description

Implementation of an energy-efficiency plan (VFDs, compressed-air leakage detection, LED upgrades, motor replacements, sub-metering). These measures reduce energy intensity per tonne produced and strengthen ISO 14001 targets.

(16.3.1.8) Primary financial effect of the opportunity

Select from:

☑ Reduced direct costs

(16.3.1.9) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(16.3.1.10) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Very likely (90–100%)

(16.3.1.11) Magnitude

Select from:

☑ Medium

Climate change

(16.3.1.1) Opportunity identifier

Select from:

☑ Opp2

(16.3.1.3) Opportunity type and primary source

Resource efficiency

☑ Other resource efficiency opportunity, please specify :Circularity / resource efficiency

(16.3.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations (our own operations)

(16.3.1.5) Country/area where the opportunity occurs

Select all that apply

☑ India

☑ Spain

(16.3.1.7) Organization specific description

Steel scrap valorization and material yield improvement: segregated scrap sold to recyclers at indexed prices, reuse of wooden and steel packaging, and design optimizations to reduce offcuts.

(16.3.1.8) Primary financial effect of the opportunity

Select from:

☑ Reduced direct costs

(16.3.1.9) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(16.3.1.10) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Likely (66–100%)

(16.3.1.11) Magnitude

Select from:

☑ Medium

Climate change

(16.3.1.1) Opportunity identifier

Select from:

☑ Opp3

(16.3.1.3) Opportunity type and primary source

Products & services

☑ Other products and services opportunity, please specify :Low-carbon products and transparency (LCA/EPD)

(16.3.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Downstream value chain (distributors or customers)

(16.3.1.5) Country/area where the opportunity occurs

Select all that apply

☑ India

☑ Spain

(16.3.1.7) Organization specific description

Development of LCA and Environmental Product Declarations (EPDs) for bearing product lines, demonstrating low-carbon footprint to key clients (Vestas, SGRE, Acciona, Iberdrola). Enhances competitiveness in tenders.

(16.3.1.8) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

(16.3.1.9) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Medium-term

(16.3.1.10) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Likely (66–100%)

(16.3.1.11) Magnitude

Select from:

☑ High

Climate change

(16.3.1.1) Opportunity identifier

Select from:

☑ Opp4

(16.3.1.3) Opportunity type and primary source

Resource efficiency

☑ Reduced water usage and consumption

(16.3.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations (our own operations)

(16.3.1.5) Country/area where the opportunity occurs

Select all that apply

☑ India

☑ Spain

(16.3.1.7) Organization specific description

Water-saving and recirculation actions: metering, leak repair, low-flow fixtures, reuse of process water in cleaning and cooling. Builds resilience against potential droughts and reduces utility costs.

(16.3.1.8) Primary financial effect of the opportunity

Select from:

☑ Reduced direct costs

(16.3.1.9) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Long-term

(16.3.1.10) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Likely (66–100%)

(16.3.1.11) Magnitude

Select from:

☑ Medium

[Add row]

C17. SME Governance

(17.1) Is there responsibility for environmental issues within your organization?

	Responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes

[Fixed row]

(17.1.1) Provide the highest positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(17.1.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(17.1.1.2) Environmental responsibilities of this position

Risks and opportunities

☑ Assessing environmental risks and opportunities

Policies, commitments, and targets

☑ Setting corporate environmental policies and/or commitments

Strategy and financial planning

☑ Developing a business strategy which considers environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Managing major capital and/or operational expenditures relating to environmental issues

(17.1.1.3) Who in the organization does this position report to

Select from:

☑ Reports to the board directly

(17.1.1.4) Frequency of reporting on environmental issues via this reporting line

Select from:

☑ Quarterly

(17.1.1.5) Please explain

CEO of the company reports to our investors. Before reporting to Legris Industries, all the decisions are shared and agreed with the Management Board.

Climate change

(17.1.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Sustainability Officer (CSO)

(17.1.1.2) Environmental responsibilities of this position

Risks and opportunities

☑ Assessing future trends in environmental risks and opportunities

☑ Managing environmental risks and opportunities

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

☑ Setting corporate environmental targets

☑ Measuring progress towards environmental corporate targets

Engagement

☑ Managing value chain engagement related to environmental issues

☑ Managing supplier compliance with environmental requirements

Strategy and financial planning

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Implementing the business strategy related to environmental issues

☑ Managing annual budgets related to environmental issues

(17.1.1.3) Who in the organization does this position report to

Select from:

☑ Reports to the board directly

(17.1.1.4) Frequency of reporting on environmental issues via this reporting line

Select from:

☑ More frequently than quarterly

(17.1.1.5) Please explain

No proper CSO in the company, but QHSE director is in charge in all ESG topics. QHSE director is part of the Management Board.

Climate change

(17.1.1.1) Position of individual or committee with responsibility

Management level

☑ Environmental, Health, and Safety manager

(17.1.1.2) Environmental responsibilities of this position

Risks and opportunities

☑ Managing environmental risks and opportunities

Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

Strategy and financial planning

☑ Managing annual budgets related to environmental issues

☑ Managing environmental reporting, audit, and verification processes

(17.1.1.3) Who in the organization does this position report to

Select from:

☑ Reports to executive leadership (CEO, CRO, CFO, COO, CSO, or equivalent)

(17.1.1.4) Frequency of reporting on environmental issues via this reporting line

Select from:

☑ More frequently than quarterly

(17.1.1.5) Please explain

HSE technician in close contact with QHSE manager. Weekly meetings in order to report and comment priority topics.
[Add row]

(17.2) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: ☑ Yes

[Fixed row]

(17.2.1) Provide details of your environmental policies.

Row 1

(17.2.1.1) Environmental issues covered

Select all that apply

☑ Climate change

(17.2.1.2) Level of coverage

Select from:

☑ Organization-wide

(17.2.1.3) Value chain stages covered

Select all that apply

☑ Direct operations (our own organization)

(17.2.1.4) Explain the coverage

This integrated policy applies to all Laulagun Bearings operations in Spain and India and forms the backbone of our ISO 9001, ISO 14001, and ISO 45001 certified management system. It establishes the company's strategic commitment to environmental protection, occupational safety, and product quality. The policy explicitly includes actions to fight climate change, such as identifying and reducing GHG emissions, improving energy efficiency, and promoting the transition toward a low-carbon and circular economy. It also covers pollution prevention, waste minimization, and legal compliance. The policy sets the framework for defining measurable

objectives and KPIs, ensuring continuous improvement and the active participation of employees and contractors. It is reviewed annually by top management and serves as a reference for establishing environmental goals aligned with the Paris Agreement principles.

(17.2.1.5) Environmental policy content

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to stakeholder engagement and capacity building on environmental issues

☑ Other environmental commitment, please specify :Commitment to fight against climate change.

Row 2

(17.2.1.1) Environmental issues covered

Select all that apply

☑ Climate change

(17.2.1.2) Level of coverage

Select from:

☑ Organization-wide

(17.2.1.3) Value chain stages covered

Select all that apply

☑ Upstream activities (suppliers)

(17.2.1.4) Explain the coverage

This Code defines the minimum ethical, social, and environmental standards required of all Laulagun Bearings suppliers and service providers / subcontractors. It covers four key areas: human rights and labour conditions, environmental protection, business integrity, and application of compliance principles. Regarding environmental and climate topics, suppliers are required to comply with all applicable environmental laws, manage waste and emissions responsibly, and identify and control hazardous substances. The Code also requires responsible sourcing and due diligence on conflict minerals, promoting transparency and traceability throughout the supply chain. Suppliers must ensure that raw materials do not contribute to human rights abuses or environmental harm and are encouraged to adopt

low-carbon solutions. Compliance is monitored through audits and non-compliance may lead to contract termination. This Code reinforces our broader climate and sustainability commitments across the value chain.

(17.2.1.5) Environmental policy content

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to stakeholder engagement and capacity building on environmental issues

Additional references/Descriptions

☑ Description of environmental requirements for procurement

Row 3

(17.2.1.1) Environmental issues covered

Select all that apply

☑ Climate change

(17.2.1.2) Level of coverage

Select from:

☑ Organization-wide

(17.2.1.3) Value chain stages covered

Select all that apply

☑ Direct operations (our own organization)

(17.2.1.4) Explain the coverage

The CSR Policy provides the overarching framework for Laulagun Bearings' social, ethical, and environmental commitments across all sites. It aligns with the UN Global Compact, ILO, and OECD principles and applies to all employees and business partners. In environmental matters, it mandates integration of ISO 14001 principles, sustainable resource use, waste and water reduction, and biodiversity protection. It sets ambitious climate goals, including a 50 % reduction in Scope 1 & 2

GHG emissions by 2030, in line with the Paris Agreement. The policy also promotes supplier engagement on climate and sustainability issues, encourages eco-design and life-cycle thinking, and supports circular-economy practices such as reusable packaging and end-of-life product recovery. Through this CSR framework, Laulagun Bearings ensures that climate action, ethical business conduct, and stakeholder well-being are embedded across its global operations.

(17.2.1.5) Environmental policy content

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

☑ Commitment to stakeholder engagement and capacity building on environmental issues

☑ Other environmental commitment, please specify :Action against climate change.

Climate-specific commitments

☑ Other climate-related commitment, please specify :Foster a sustainable consumption of resources in the organization: raw material, water, electricity, paper, etc., aiming at a 50% reduction in waste from products delivered to our customers by 2030.

Social commitments

☑ Adoption of the UN International Labour Organization principles

☑ Commitment to promote gender equality and women's empowerment

☑ Commitment to respect internationally recognized human rights

☑ Other social commitment, please specify :- Laulagun Bearings is committed to ensuring that all employees receive a living wage, sufficient to meet their basic needs and provide discretionary income. - Develop the organization through the development of the people.

Additional references/Descriptions

☑ Description of grievance/whistleblower mechanism to monitor non-compliance with the environmental policy and raise/address/escalate any other greenwashing concerns

☑ Other, additional references/descriptions please specify :Different commitments on: Customers, Workers, Community & Governance, Ethics & Business Integrity, Human Rights, Environment, Supply Chain.

[Add row]

C18. SME Business Strategy

(18.1) Have risks and opportunities created by environmental issues influenced your strategy and/or financial planning?

(18.1.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☑ Yes, strategy only

(18.1.2) Primary reason why environmental risks and opportunities have not affected your strategy and/or financial planning

Select from:

☑ No standardized procedure

(18.1.3) Explain why environmental risks and/or opportunities have not affected your strategy and/or financial planning

We are in the process of integrating environmental metrics into financial planning; however, the analysis is currently qualitative rather than quantitative. Environmental risks and opportunities have influenced our business strategy through our ISO 14001 Environmental Management System and our internal strategic analysis (SWOT). Environmental aspects are evaluated annually as part of management review and included in our corporate strategic framework. For instance, the risks related to energy costs, resource use and customer ESG requirements are integrated into our Strategic Plan 2024–2029, under the pillar "Industrial & Quality development". These drivers have led Laulagun to: - adopt 100 % renewable electricity at our Spanish site and plan a solar supply contract in India, - set targets for energy efficiency and waste valorization, - strengthen supplier engagement through our Code of Conduct, - maintain and improve our EcoVadis sustainability rating (currently Bronze, target Gold by 2026). While environmental risks are not yet quantified in the financial planning or budgeting process, they are considered qualitatively when prioritizing investments (e.g. energy-efficiency projects, compliance upgrades). We aim to integrate environmental metrics progressively into our financial decisions as our data maturity and reporting (CDP, EcoVadis) improve. Our approach therefore focuses on aligning our operations and product offering with decarbonization trends in the wind-energy sector and on anticipating customer ESG expectations. Environmental opportunities, such as energy savings and circularity, are recognized as contributors to cost reduction and competitiveness, even if not yet expressed as specific budget lines.
[Fixed row]

(18.1.1) Describe where and how risks and opportunities created by environmental issues have influenced your strategy and/or financial planning?

Strategy

(18.1.1.1) Business areas that have been affected

Select all that apply

☑ Products and services

☑ Operations

(18.1.1.3) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(18.1.1.4) Environmental issues relevant to the risks and/or opportunities that have affected your strategy and/or financial planning in this area

Select all that apply

☑ Climate change

(18.1.1.5) Describe how environmental risks and/or opportunities have affected your strategy and/or financial planning in this area

OPERATIONS Environmental risks and opportunities have directly influenced Laulagun's operational strategy through our ISO 14001 EMS and the strategic pillar "Industrial & Quality develpment." Energy efficiency, waste reduction and compliance are now key focus areas. Rising energy costs and the need to reduce GHG emissions have driven the company to switch to 100% renewable electricity in Spain and plan solar electricity in India, reducing exposure to volatile energy prices. Operational risks related to extreme weather, waste management and regulatory tightening have been included in our environmental risk assessment procedure and are reviewed annually by top management. As a result, Laulagun has integrated preventive actions such as infrastructure upgrades, improved monitoring, and a focus on resource optimization. Opportunities linked to efficiency, renewable energy and recycling have also shaped investment priorities. Each plant defines annual environmental objectives (energy, waste, water) reviewed in Management Review and incorporated into the corporate scorecard. The outcome is a continuous-improvement loop between risk assessment, operational planning and strategic decision-making, aligned with customer sustainability requirements and the decarbonization of the wind-energy supply chain. PRODUCTS AND SERVICES Environmental opportunities have guided Laulagun's product and service strategy, particularly in response to customer sustainability expectations. Major clients in the wind-energy sector (Vestas, SGRE, Nordex Acciona, Iberdrola) are increasingly requesting environmental transparency and low-carbon solutions. This has led Laulagun to plan the development of life-cycle assessment (LCA) and the development of Environmental Product Declarations (EPDs) for bearing products in 2026, highlighting energy and material efficiency. The company's EcoVadis sustainability rating

(Bronze, with a target of Gold by 2026) and participation in CDP are used to communicate progress and align with customer ESG strategies. These initiatives strengthen Laulagun's market position and open new business opportunities by demonstrating environmental commitment and innovation capacity. Through the integration of circularity, recycled content and low-carbon sourcing into product design and supplier selection, environmental opportunities are not only shaping the company's image but also driving tangible improvements in competitiveness and customer satisfaction.
[Add row]

(18.2) Does your organization's strategy include a climate transition plan?

	Transition plan
	Select from: ☑ No, but we are developing a climate transition plan within two years

[Fixed row]

(18.3) Do you engage with suppliers, customers, and other stakeholders within your value chain on environmental issues?

Suppliers

(18.3.1) Engaging with this stakeholder on environmental issues

Select from:
☑ Yes

(18.3.2) Environmental issues covered

Select all that apply
☑ Climate change
☑ Water

(18.3.4) Type of engagement

Select all that apply

☑ Information collection

☑ Other

(18.3.5) Details of engagement

We engage suppliers through our Supplier Code of Conduct, which includes environmental requirements (energy and GHG management, waste and water control, compliance with permits) and must be accepted as a condition of doing business. We collect ESG information via a ESG self-assessment questionnaire and maintain KPIs on Code acceptance and completion rates in our scorecard. For high-impact categories (steel, packaging, logistics), we request energy/CO_2 data and recycled content information to support tenders and LCA/EPD work. When gaps are identified, we agree corrective action plans and follow-up. Engagement is integrated into our ISO 14001 life-cycle perspective and the annual review of significant environmental aspects.

Customers

(18.3.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(18.3.2) Environmental issues covered

Select all that apply

☑ Climate change

(18.3.4) Type of engagement

Select all that apply

☑ Information collection

☑ Other

(18.3.5) Details of engagement

We collaborate with key customers in the wind sector (e.g., Vestas, SGRE, Acciona, Iberdrola) by responding to ESG sections in RFQs, sharing energy and emissions KPIs (including 100% renewable electricity for Scope 2), and aligning roadmaps for decarbonization, circular packaging and traceability. We disclose our

EcoVadis rating and improvement plan (targeting Gold by 2026) and are developing LCA/EPD documentation for core bearing families to enhance transparency in tenders. Feedback from customers is reviewed in Management Review and used to update our ISO 14001 objectives and improvement projects.

Investors and shareholders

(18.3.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(18.3.2) Environmental issues covered

Select all that apply

☑ Climate change

(18.3.4) Type of engagement

Select all that apply

☑ Information collection

(18.3.5) Details of engagement

As a privately held company, we report to owners/board through our annual Management Review and periodic performance updates. We present environmental KPIs (energy use, Scope 1–2 emissions, water, waste), compliance status, EcoVadis results and our CDP disclosure highlights. The board/owners approve budgets for energy-efficiency, compliance upgrades and business-continuity measures. Progress is tracked via our integrated scorecard and internal audits under ISO 14001.

Other value chain stakeholders, please specify

(18.3.1) Engaging with this stakeholder on environmental issues

Select from:

☑ Yes

(18.3.2) Environmental issues covered

Select all that apply

☑ Climate change

☑ Water

(18.3.4) Type of engagement

Select all that apply

☑ Information collection

☑ Education/ Information sharing

(18.3.5) Details of engagement

We work with logistics providers and waste-management contractors to reduce environmental impacts and strengthen resilience. Engagement includes site inductions and environmental instructions for contractors, coordination on reusable/returnable packaging and better segregation, and joint planning for storm/flood contingencies and alternative transport routes. Performance (e.g., waste recovery rates, incident-free operations) is reviewed through contract meetings and audits. Activities are embedded in our ISO 14001 operational control and emergency preparedness procedures and reflected in our environmental aspects register. [Fixed row]

C19. SME Environmental Performance – Consolidation Approach

(19.1) Select the consolidation approach used by your organization to determine the climate-related impacts that are reported on throughout your response. Note that this option should align with your chosen approach for consolidating your GHG inventory.

(19.1.1) Consolidation approach used

Select from:

☑ Operational control

(19.1.2) Provide the rationale for the choice of consolidation approach

Laulagun Bearings applies the operational control approach to consolidate its greenhouse gas (GHG) inventory and other environmental performance data. This method has been selected because the company exercises full authority to introduce and implement operational policies, environmental programs, and improvement actions across all its facilities — in Euskadi (Spain) and Chennai (India) — under the same Integrated Management System (ISO 14001:2015). This approach provides the most accurate representation of Laulagun's actual ability to manage and reduce environmental impacts. All plants operate under centralized decision-making for QHSE, energy, and sustainability, which ensures consistency in data collection, monitoring, and performance evaluation. The equity share or financial control approaches were not selected, since Laulagun's facilities are wholly owned and no joint ventures or shared-control operations exist. Consequently, 100 % of emissions and environmental data from all sites under operational control are included in the inventory. The operational control boundary is defined and applied in accordance with the GHG Protocol Corporate Standard and detailed in the internal procedure Carbon Footprint Management. The procedure establishes uniform data collection and calculation methods for Scope 1 and Scope 2 emissions, as well as criteria for inclusion/exclusion, data quality assurance, and uncertainty assessment (target uncertainty < 5 %). This approach aligns with Laulagun's environmental policy and its commitment to continuous improvement and transparency. It enables the organization to identify, monitor, and reduce its GHG emissions through direct control of energy consumption, fuel use, and refrigerant management, while facilitating comparability over time and integration with the company's ISO 14001 and future CSRD reporting frameworks.
[Fixed row]

C20. SME Environmental Performance – Climate Change

(20.1) Do you evaluate your organization's greenhouse gas (GHG) emissions? Note that you can measure your emissions or estimate them using the assistance of a carbon accounting tool.

Scope 1 (direct emissions from owned or controlled activities)

(20.1.1) Emissions evaluated

Select from:

☑ Yes, we use tailored in-house or paid-for resources to calculate them

(20.1.4) Indicate whether you had any major barriers or challenges evaluating your emissions in the reporting year

Select from:

☑ No

(20.1.8) Indicate if you are providing emissions data for past reporting years

Select from:

☑ Yes

(20.1.9) Number of past reporting years you will be providing emissions data for

Select from:

☑ 1 year

Scope 2 (indirect emissions from purchased electricity, heat, steam or cooling)

(20.1.1) Emissions evaluated

Select from:

☑ Yes, we use tailored in-house or paid-for resources to calculate them

(20.1.2) Scope 2 approach

Select from:

☑ We are reporting both a Scope 2 location-based and market-based figure

(20.1.4) Indicate whether you had any major barriers or challenges evaluating your emissions in the reporting year

Select from:

☑ No

(20.1.8) Indicate if you are providing emissions data for past reporting years

Select from:

☑ Yes

(20.1.9) Number of past reporting years you will be providing emissions data for

Select from:

☑ 1 year

Scope 3 (indirect emissions in upstream/downstream value chain)

(20.1.1) Emissions evaluated

Select from:

☑ Yes, we use a generic tool to estimate them, please specify :AKTIO

(20.1.4) Indicate whether you had any major barriers or challenges evaluating your emissions in the reporting year

Select from:

☑ Yes

(20.1.5) Please explain the major barriers or challenges in evaluating your emissions

Scope 3 emissions are estimated using the Aktio platform, which applies GHG Protocol category methodologies based on procurement data and industry emission factors. Data coverage and quality are still being improved, as some supplier information and transport data are incomplete. Scope 3 is therefore considered indicative and not yet verified.

(20.1.6) Main measures which have helped, or would help, to manage or resolve the challenges

Select all that apply

☑ Stakeholder or peer support

(20.1.8) Indicate if you are providing emissions data for past reporting years

Select from:

☑ Yes

(20.1.9) Number of past reporting years you will be providing emissions data for

Select from:

☑ 1 year

[Fixed row]

(20.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

(20.3) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions which are attributed to the entities you are including in your CDP response which are not included in your disclosure?

Select from:

☑ No

(20.4) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(20.4.1) Gross global Scope 1 emissions (metric tons CO2e)

433.88

(20.4.3) Methodological details

The GHG inventory for Laulagun Bearings has been developed in accordance with the GHG Protocol Corporate Accounting and Reporting Standard (WRI/WBCSD). The reporting year 2023 has been established as the base year for Laulagun’s verified GHG emissions. The inventory covers all operations under Laulagun’s operational control, including the Olaberria (Spain) and Chennai (India) manufacturing plants, within a multisite integrated management system (ISO 9001, 14001, 45001). The calculation methodology follows the operational control consolidation approach. Scope 1 emissions include direct fuel combustion (diesel and LPG) and refrigerant leakage. Emission factors were obtained from the Spanish Ministry for Ecological Transition (MITECO), GHG - IPCC Global Warming Potential Values, Central Electricity Authority (CEA) from India and the India GHG Program. Activity data were derived from energy invoices, internal consumption records, and maintenance logs. Emission calculations were performed internally using an Excel-based tool developed by Laulagun, reviewed by an external consultant, and was verified by DNV Business Assurance in 12th and 13th November 2025. Scope 2 (market-based) emissions were calculated using supplier-specific emission factors in Spain, complemented by IEA country grid factors for India. Scope 3 emissions were calculated using Aktio software but are excluded from verification in this cycle. Future updates to the inventory will refine Scope 3 boundaries and incorporate improvements in data collection for the 2024 footprint.
[Fixed row]

(20.5) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(20.5.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

2779.61

(20.5.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

2291.2

(20.5.5) Methodological details

The Scope 2 inventory for Laulagun Bearings has been calculated in accordance with the GHG Protocol Corporate Accounting and Reporting Standard (WRI/WBCSD), applying both location-based and market-based approaches. The reporting year 2023 has been established as the base year for verified data. The calculation covers all operations under Laulagun's operational control, including the Olaberria (Spain) and Chennai (India) manufacturing plants, both integrated under the company's multisite management system certified to ISO 9001, 14001 and 45001. For the Spanish operations, all electricity purchased in 2023 was certified as 100 % renewable through supplier guarantees of origin, resulting in zero market-based emissions. Location-based emissions have been additionally calculated using national grid average emission factor for 2023 (121g/KWh), taken from CNMC database (Comisión Nacional de los Mercados y la Competencia). For the Indian plant, 2023 electricity consumption was calculated using invoices from Tamil Nadu Government Authority. The local grid has a high carbon intensity; therefore, the CEA (Central Electricity Authority, India) grid emission factor (0.727 kg CO_2e/kWh) was applied for the location-based approach. At that time, the plant did not yet use on-site renewables, although a solar PPA covering approximately 75–80 % of total electricity consumption was signed and implemented during 2025, which will significantly reduce Scope 2 emissions in future reports. All calculations were performed internally using a company-developed Excel model, reviewed by an external consultant, and will be verified by DNV Business Assurance in November 2025 under the GHG Protocol. Emission factors were selected from MITECO (Spain) and CEA (India) databases. This methodology ensures full transparency and consistency with Laulagun's procedure Carbon Footprint Management, and provides a robust baseline for tracking the effect of renewable energy integration on GHG performance over time. Note: for 20.11 question, it has been considered that market-based emissions equal location-based emissions in India, even though it was already explained that we originally can calculate only location-based emissions, as the electricity in India comes from the local authority.
[Fixed row]

(20.7) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(20.7.1) Evaluation status

Select from:
☑ Relevant, calculated

(20.7.2) Emissions in reporting year (metric tons CO2e)

26362.12

Capital goods

(20.7.1) Evaluation status

Select from:
☑ Relevant, calculated

(20.7.2) Emissions in reporting year (metric tons CO2e)

1018.07

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(20.7.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(20.7.3) Please explain

All the fuel and energy included in scopes 1 & 2 or upstream / downstream transportation and distribution.

Upstream transportation and distribution

(20.7.1) Evaluation status

Select from:
☑ Relevant, calculated

(20.7.2) Emissions in reporting year (metric tons CO2e)

2934.35

Waste generated in operations

(20.7.1) Evaluation status

Select from:
☑ Not relevant, calculated

(20.7.2) Emissions in reporting year (metric tons CO2e)

48.16

Business travel

(20.7.1) Evaluation status

Select from:
☑ Not relevant, calculated

(20.7.2) Emissions in reporting year (metric tons CO2e)

117.39

Employee commuting

(20.7.1) Evaluation status

Select from:
☑ Relevant, calculated

(20.7.2) Emissions in reporting year (metric tons CO2e)

465.56

Upstream leased assets

(20.7.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(20.7.3) Please explain

All leased assets included in purchased goods and services.

Downstream transportation and distribution

(20.7.1) Evaluation status

Select from:
☑ Relevant, calculated

(20.7.2) Emissions in reporting year (metric tons CO2e)

1198.57

Processing of sold products

(20.7.1) Evaluation status

Select from:
☑ Relevant, calculated

(20.7.2) Emissions in reporting year (metric tons CO2e)

1250.93

Use of sold products

(20.7.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(20.7.3) Please explain

Already included with processing of sold products.

End of life treatment of sold products

(20.7.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(20.7.3) Please explain

Already included with processing of sold products.

Downstream leased assets

(20.7.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(20.7.3) Please explain

Not applicable.

Franchises

(20.7.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(20.7.3) Please explain

Not applicable.

Investments

(20.7.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(20.7.3) Please explain

Not applicable.

Other (upstream)

(20.7.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(20.7.3) Please explain

Not applicable.

Other (downstream)

(20.7.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(20.7.3) Please explain

Not applicable.
[Fixed row]

(20.7.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(20.7.1.19) Comment

2023 represents Laulagun Bearings' first complete Scope 3 estimate using the Aktio platform in line with the GHG Protocol categories. Given this is our first consistent dataset, no earlier historical Scope 3 data are disclosed/restated this year. The figures reported cover the following categories assessed as relevant: Purchased goods and services, Capital goods, Upstream transportation and distribution, Waste generated in operations, and Business travel. "Fuel- and energy-related activities (not in Scopes 1–2)" was assessed as not relevant because all purchased fuels/electricity are already included in Scopes 1–2. Data were compiled primarily from procurement records and invoices and converted using Aktio's recognized emission-factor libraries consistent with GHG Protocol guidance. Due to supplier data gaps, several estimates rely on spend-based or hybrid methods; therefore, uncertainty is higher than for Scopes 1–2. Scope 3 results are not included in the DNV verification scheduled for Scopes 1–2; they should be considered indicative and subject to improvement. During 2025–2026 we will strengthen Scope 3 data quality by: (i) expanding supplier requests (GHG/energy/recycled content) through our Supplier Code of Conduct, (ii) collecting activity-based data for key categories (e.g., tonnage and routes for logistics), (iii) refining category boundaries and calculation procedures under Carbon Footprint Management, and (iv) aligning with customer requirements and our ISO 14001 management review cycle. As our process matures, we plan to recalculate and disclose 2024 Scope 3 figures (and prior years where feasible) to enable consistent year-on-year comparisons. In summary, 2023 establishes the baseline year for Scope 3 under a transparent methodology but with recognized limitations. Future submissions will prioritize completeness, activity data, and supplier engagement to reduce uncertainty and improve comparability.
[Fixed row]

(20.8) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status	Attach verification evidence/report (optional)
Scope 1 (direct emissions from owned or controlled activities)	*Select from:* ☑ Third-party verification or assurance process in place	*DNV letter to whom LAULAGUN year 2023 verification firmada.pdf*
Scope 2 (location-based or market-based indirect emissions from purchased electricity, heat, steam or cooling)	*Select from:* ☑ Third-party verification or assurance process in place	*DNV letter to whom LAULAGUN year 2023 verification firmada.pdf*

[Fixed row]

(20.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

(20.9.1) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

☑ This is our first year of reporting, so we cannot compare to last year

(20.9.3) Please explain

The reporting year 2023 represents the first complete greenhouse gas (GHG) inventory developed by Laulagun Bearings in accordance with the GHG Protocol Corporate Accounting and Reporting Standard (WRI/WBCSD). This inventory establishes the company's baseline year for Scope 1 and Scope 2 emissions, which will be verified by DNV Business Assurance in November 2025. As this is the first reporting year, no comparison with previous years can be made. Prior to 2023, Laulagun did not have a formal and consolidated methodology for carbon accounting across its two production sites (Spain and India). The company's previous energy and environmental records were used for internal management purposes but were not aligned with the GHG Protocol structure or verification standards. The 2023 inventory marks the starting point of a structured carbon management system, integrated into Laulagun's ISO 14001-certified environmental management system and governed by the internal procedure Carbon Footprint Management. This system establishes clear responsibilities, data collection processes, emission factor references (MITECO, CEA India, IPCC), and review mechanisms. In the coming years, Laulagun aims to strengthen the accuracy and consistency of its GHG reporting, expanding the scope of analysis to include Scope 3 emissions and the impacts of renewable energy integration in its Indian operations. Therefore, 2023 serves as the base year for all future performance comparisons, reduction targets, and continuous improvement activities.
[Fixed row]

(20.10) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Laulagun Bearings Euskadi*	*198.66*
Row 2	*Laulagun Bearings India*	*235.22*

[Add row]

(20.11) Break down your total gross global Scope 2 emissions by business activity.

	Activity	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	*Laulagun Bearings Euskadi*	*485.08*	*3.46*
Row 2	*Laulagun Bearings India*	*2291.2*	*2291.2*

[Add row]

(20.15) Does your organization break down its electricity consumption by country/area.

Select from:

☑ Yes

(20.15.1) Provide a breakdown by country/area of your purchased or acquired electricity consumption in MWh.

Row 1

(20.15.1.1) Country/area

Select from:

☑ Spain

(20.15.1.2) MWh from renewable sources

4022.09

(20.15.1.3) MWh from non-renewable sources

14.37

(20.15.1.4) Total (renewable + non-renewable) MWh

4036.46

(20.15.1.5) Comment

Almost all the electricity consumed at Laulagun Euskadi facilities during 2023 was supplied under a contract that guarantees 100% renewable energy, certified through Guarantees of Origin (GdO) issued by the Spanish regulatory authority (CNMC – Comisión Nacional de los Mercados y la Competencia). These certificates ensure that almost all the electricity purchased is generated from renewable sources such as wind, solar, and hydro, and therefore contributes zero market-based emissions in the Scope 2 calculation. The plant's total electricity consumption data was obtained from utility invoices. For the market-based approach, a zero-emission factor was applied based on the supplier's renewable certification. For the location-based approach, emission factors from the Spanish Ministry for Ecological Transition (MITECO) were used, specifically the 2023 national grid average factor (0.121 kg CO_2/kWh), which also results in negligible emissions given Spain's decarbonized grid mix. The methodology follows the GHG Protocol Corporate Standard, applying the operational control consolidation approach. All calculations were performed using Laulagun's in-house Excel tool, verified by an external sustainability consultant, and will be reviewed and assured by DNV Business Assurance under the GHG Protocol during November 2025. This approach ensures that Laulagun Euskadi's operations are fully aligned with both national carbon accounting requirements and international reporting standards, and establishes a solid baseline for tracking the impact of future energy efficiency and self-consumption projects currently under study.

Row 2

(20.15.1.1) Country/area

Select from:

☑ India

(20.15.1.2) MWh from renewable sources

0

(20.15.1.3) MWh from non-renewable sources

3151.58

(20.15.1.4) Total (renewable + non-renewable) MWh

3151.58

(20.15.1.5) Comment

The Chennai (India) plant obtains its electricity supply directly from the Tamil Nadu Electricity Board (TNEB), a government-owned utility. Since the electricity provider is a public authority, there is no contractual supplier-specific mix or renewable certification available. Therefore, the emission factor applied corresponds to the official value published by the Central Electricity Authority (CEA) in the document "CO_2 Baseline Database for the Indian Power Sector – Version 17" (2023), which provides a national average of 0.85 kg CO_2e/kWh for the location-based approach. Electricity consumption data were obtained from monthly TNEB invoices. No renewable energy certificates (RECs) or green power purchase agreements (PPAs) were in place during 2023. However, during 2025 the plant has implemented a solar energy Power Purchase Agreement, supplying approximately 75–80% of total electricity demand from on-site and off-site solar installations. This change will substantially reduce Scope 2 emissions in future reporting cycles. The calculation methodology follows the GHG Protocol Corporate Standard, and the operational control consolidation approach consistent with Laulagun Bearings' global GHG inventory. Emission calculations were conducted internally using a standardized Excel model, reviewed by an external consultant, and will be verified by DNV Business Assurance. This conservative approach ensures consistency, transparency, and traceability while recognizing the limitations of available regional energy data and the progressive decarbonization efforts underway in India.
[Add row]

(20.16) Did you have an emissions or other climate-related target that was active in the reporting year?

(20.16.1) Emissions or other climate-related target

Select all that apply

☑ No target

(20.16.2) Primary reason for not having an emissions or other climate-related target

Select from:

☑ We are planning to introduce a target in the next two years

(20.16.3) Please explain

2023 was Laulagun Bearings' first year developing a consolidated GHG inventory for all sites (Spain and India) in line with the GHG Protocol. Our priority in the reporting year was to establish a robust baseline and strengthen the underlying data systems (metering, invoices, factors, governance) within our ISO 14001 framework. Because this was the first consolidated baseline, we did not activate a formal emissions-reduction target in 2023. To ensure credibility, Scope 1 and Scope 2 data for 2023 are being independently verified by DNV. We consider third-party verification a prerequisite to setting targets, so that goals and progress will be measured against a reliable, auditable base year. Since 2024 data collection was still being improved (particularly for Scope 3), we decided not to announce interim targets that could require restatement. Instead, we focused on actions that enable future target delivery: 100% renewable electricity in Spain, continuous efficiency projects, and the execution of a solar PPA in India (from 2025) covering ~75–80% of that site's electricity. As our data maturity improves, we plan to adopt targets starting in 2025/26, initially for Scope 1 and Scope 2 (absolute and/or intensity, e.g., tCO_2e per tonne produced), with a clear roadmap to expand to material

Scope 3 categories once supplier data quality is sufficient. Targets will be reviewed annually in Management Review and aligned with customer expectations and our EcoVadis improvement plan (aiming at Gold by 2026). In short, 2023 was the year to build a verified baseline and governance. Formal targets are under development to be launched after verification, ensuring they are credible, traceable and achievable rather than speculative.
[Fixed row]

(20.17) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

	Emissions reduction initiative	Primary reason for not having an emissions reduction initiative
	Select from: ☑ No, but we plan to within the next two years	*Select from:* ☑ Other, please specify :2023 was the reference year, so we were still building a solid carbon accounting baseline. However, several preparatory actions were taken, like the continuation of 100% renewable electricity supply certified.

[Fixed row]

C21. SME Sign Off

(21.1) Is any environmental information included in your CDP response (not already reported in 20.8) is verified and/or assured by a third party?

Select from:
☑ Third-party verification/assurance is currently in progress

(21.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(21.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply
☑ Climate change

(21.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Consolidation approach
☑ All data points in module 19

(21.1.1.3) Verification/assurance standard

Climate change
☑ Other climate change verification standard, please specify

(21.1.1.4) Further details of the third-party verification/assurance process

Laulagun Bearings' GHG emissions for Scope 1 and Scope 2 are being verified by DNV Business Assurance for reference year 2023, based on the GHG Protocol Corporate Accounting and Reporting Standard (WRI/WBCSD). The verification covers all facilities under Laulagun's operational control, including the manufacturing plants in Olaberria (Spain) and Chennai (India). The process involves an independent third-party review of emission boundaries, activity data, emission factors, and calculation methodologies described in our internal procedure Carbon Footprint Management. DNV performs analytical procedures, data sampling, and cross-checks against energy invoices, fuel records, and meter readings to confirm accuracy and completeness. The scope of verification includes: - Scope 1: Direct emissions from natural gas, diesel, and refrigerant use. - Scope 2: Indirect emissions from purchased electricity (market-based approach). Scope 3 emissions, calculated through the Aktio software, are currently excluded from verification and are considered indicative. The verification conclusion will be issued in November 2025, confirming data reliability and alignment with GHG Protocol methodology. The verification supports Laulagun's commitment to transparency, continuous improvement, and readiness for external sustainability reporting frameworks such as CDP and EcoVadis. Verification of documentation is on-going with DNV, and final visit to facilities by auditor will be done on 12th and 13th November 2025.

Row 2

(21.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

(21.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Consolidation approach

☑ Other data point in module 19, please specify

(21.1.1.3) Verification/assurance standard

General

☑ Other general verification standard, please specify :ISO14001:2015

(21.1.1.4) Further details of the third-party verification/assurance process

Laulagun Bearings maintains a certified Integrated Management System (IMS) in accordance with ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018, covering all operations under its multisite certification scheme (Spain – Olaberria, and India – Chennai). The certification is audited annually by DNV, which independently assesses compliance with international standards for quality, environmental management, and occupational health and safety. Within this framework, Laulagun systematically identifies and evaluates environmental aspects, legal requirements, and risks related to climate change, energy use, waste management, and emissions. The system includes documented procedures such as Carbon Footprint Management, ensuring that environmental data (including energy consumption

and GHG emissions) are accurately collected, reviewed, and validated. Although the IMS certification does not directly verify quantitative greenhouse gas data, it provides a robust governance and assurance mechanism that guarantees the reliability of environmental information and continuous improvement of performance. This certification complements the third-party verification of Scope 1 and Scope 2 emissions by DNV under the GHG Protocol Corporate Standard, supporting Laulagun's commitment to transparency, sustainability, and climate action.

(21.1.1.5) Attach verification/assurance evidence/report (optional)

ISO_14001-ENG-C748328-4-20250521.pdf
[Add row]

(21.2) Provide the following information for the person that has signed off (approved) your CDP response.

(21.2.1) Job title

Iñaki Lizarralde Global QHSE director

(21.2.2) Corresponding job category

Select from:
☑ Chief Sustainability Officer (CSO)
[Fixed row]