



STECONFERR
GLOBAL RAIL INFRASTRUCTURE

**Sustainability
Report
2024**

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MESSAGE FROM THE BOARD

At a company undergoing constant growth and transformation, the challenges we face become increasingly complex and ambitious. At Steconfer, we are attentive to these changes and determined to deal with them with vision, responsibility and commitment. When we identify that an initiative generates value and positive impacts, we assume the purpose of providing continuity, always with the involvement and dedication of our teams.

We recognise how the path towards sustainability is continuous and requires efforts on multiple fronts. We know there is still a great deal to do — internally, in our operations and culture, and externally, in our relationships with our stakeholders and our contribution towards the communities we operate in. We believe that only through collaboration and joint action may we build a more balanced, resilient and fairer future.

Our actions are defined by their ethical and sustainable management. We commit not only to compliance with the legal, regulatory and contractual obligations but also to the continuous improvement of our processes and practices. This commitment is reflected in our signing up to the United Nations Agenda 2030 and incorporating the 17 Sustainable Development Goals (SDGs) into our strategic framework.

Steconfer is profoundly committed to social and environmental responsibility. We believe that our project should, whenever feasible, improve the living conditions and the lives of the communities where we act, minimising any negative impacts and actively contributing towards a more sustainable future.



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COMPANY PROFILE

COMPANY PROFILE

Founded in August 1997, Steconfer now draws upon over 25 years of experience in the railway infrastructure sector. Ever since its origins, the company has been developing and implementing projects in every area of railway construction and maintenance, inscribing its mark of competence, technical rigour and compliance with deadlines in various markets, both nationally and internationally.

Its growth strategy is dependent on the pillars of innovation, the adoption of new technologies, the development of strategic partnerships and progressively advancing into new markets. Steconfer is today recognised as a global player with a consolidated presence in ten countries.

One of the fundamental factors to the company's success is its valuation of its human capital. Steconfer believes that people create value and thus invests in training, technical specialisation, the recognition of merit and promoting safe, respectful and inclusive working environments.

The corporate culture is shaped by collaboration, commitment and valuing diversity. Steconfer fosters integration, respect and equality of opportunity within a multicultural and global environment.

MISSION

Supplying technical solutions for railway infrastructures in the global marketplace, generating value for clients, staff, shareholders and other interested parties with social and environmental responsibility.

VISION

To be a global benchmark reference in railway infrastructure solutions through the implementation of sustainable, innovative and high quality projects, driven by the talent and dedication of its teams.

VALUES

Professionalism, client focus, transparency, equality, culture of safety, innovation, sustainability and social responsibility.

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Steconfer maintains a broad reaching portfolio of services spanning areas including track installation, electrification, signalling, telecommunications and rail system maintenance, with an increasing focus on technological innovation and sustainability.

Steconfer nurtures strategic partnerships with suppliers, clients and distributors, adopting rigorous criteria for selection and promoting best sustainability practices throughout the value chain. The company prioritises dialogue with local communities and seeks to generate a positive socioeconomic impact in its operational territories.

Sustainability reflects one of the central pillars in the company's strategy. Steconfer is committed to the ESG (Environmental, Social and Governance) principles and has set the objective of obtaining carbon neutrality by 2050. Its initiatives include transiting to renewable energies, the optimisation of energy efficiencies, the reduction of greenhouse gas emissions and the adoption of circular economy practices, fostering diversity and equality of opportunity and the adaptation of installations to ensure greater accessibility.



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APPROACH TO SUSTAINABILITY

APPROACH TO SUSTAINABILITY

Providing continuity to a strategy in effect since 2020, sustainability remains a structuring axis of Steconfer actions with the ambition of developing profitable and resilient businesses, capable of creating economic, environmental and social value over the short, medium and long term for all relevant parties.

Steconfer regularly submits its management system to independent evaluation by EcoVadis. In June 2024, the company was awarded a bronze medal, integrating into the top 35% of companies evaluated and in recognition of their robust management systems aligned with sustainability criteria.



Stakeholders and Permanent Dialogue

The Steconfer stakeholders are identified in accordance with their influence and interest in the activities, products and services of the company as well as for their potential impact on the implementation of the sustainability strategy.



Figure 1
Organisational stakeholders

Constant communications with these groups is deemed essential. It is through dialogue that we are able to identify gaps, manage expectations and foster improvements to processes.

CHANNELS OF COMMUNICATION	Members of staff	Shareholders and Management Bodies	Clients	Suppliers	Planet	Official and Banking Entities	Society	Strategic Partners
Training Actions	✓							
Whistleblowing Channel	✓		✓	✓				
Statements	✓	✓				✓		
Conferences						✓		✓
E-mails	✓	✓	✓	✓		✓		
ESG Legislation					✓	✓		
Participation in sustainability events					✓			
Complaints			✓					
Social Networks			✓				✓	✓
Financial and other reports		✓	✓			✓	✓	✓
Meetings	✓	✓	✓	✓		✓		✓
Phone-calls	✓	✓	✓	✓		✓		
Technical and other visits			✓					
Website			✓			✓	✓	✓

Figure 2
Stakeholder communication channels

Materiality Matrix

Over the course of 2024, Steconfer engaged with senior and middle management, as well as other stakeholders, with a view to defining its materiality matrix, based on the standards internationally established for the sector by SASB (Sustainability Accounting Standards Board).

This process identified 26 relevant themes, grouped into five major clusters:

- **Environment:** greenhouse gas emissions, energy management, air quality, waste management, environmental impacts;
- **Social Capital:** human rights, privacy, data security, accessibility, client wellbeing;
- **Human Capital:** labour practices, health and safety, diversity and inclusion;
- **Business Model and Innovation:** product design, resilience, supply chain, risk management;
- **Leadership and Governance:** business ethics, competitive behaviours, legal and regulatory compliance.

Environment	Social Capital	Human Capital	Business Model and Innovation	Leadership and Governance
1 - Greenhouse gas emissions	7 - Human Rights and Community Relations	14 - Labour Practices	17 - Product Design and Life Cycle Management	22 - Business Ethics
2 - Air Quality	8 - Client Privacy	15 - Staff Health and Safety	18 - Business Model Resilience	23 - Competitive Behaviour
3 - Energy Management	9 - Data Security	16 - Involvement, Staff Diversity and Inclusion	19 - Supply Chain Management	24 - Managing the Legal and Regulatory Framework
4 - Water and Wastewater Management	10 - Access and Accessibility		20 - Material Supply and Efficiency	25 - Risk Management and Critical Incidents
5 - Management of Wastes and Dangerous Materials	11 - Product Quality and Safety		21 - Physical Impacts of Climate Change	26 - Systemic Risk Management
6 - Ecological Impacts	12 - Client Wellbeing			
	13 - Sales and Product Labelling Practices			

Figure 3
Materiality related themes

Based on this analysis, a materiality matrix was constructed in accordance with the relative importance attributed by each interested party.

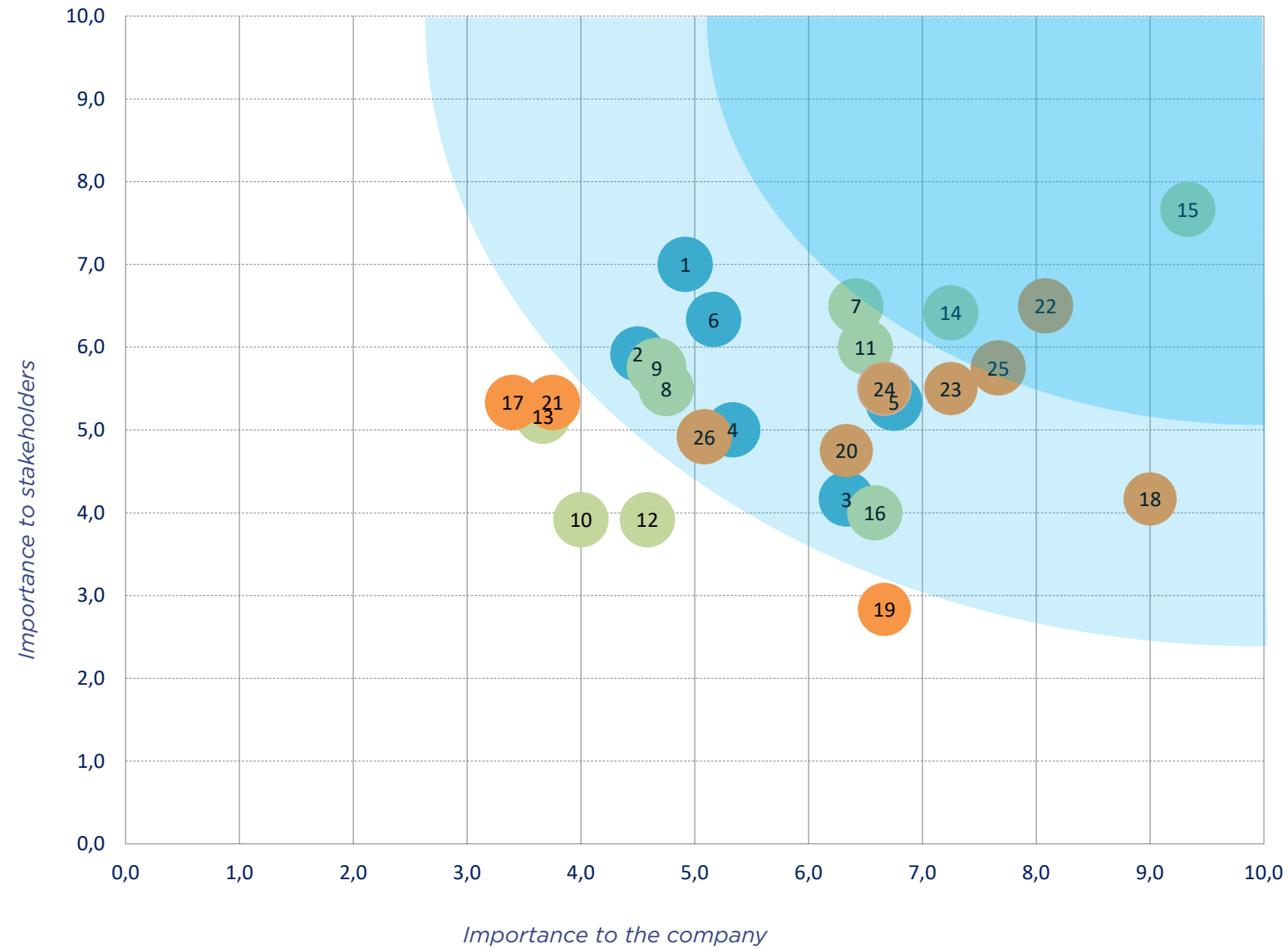
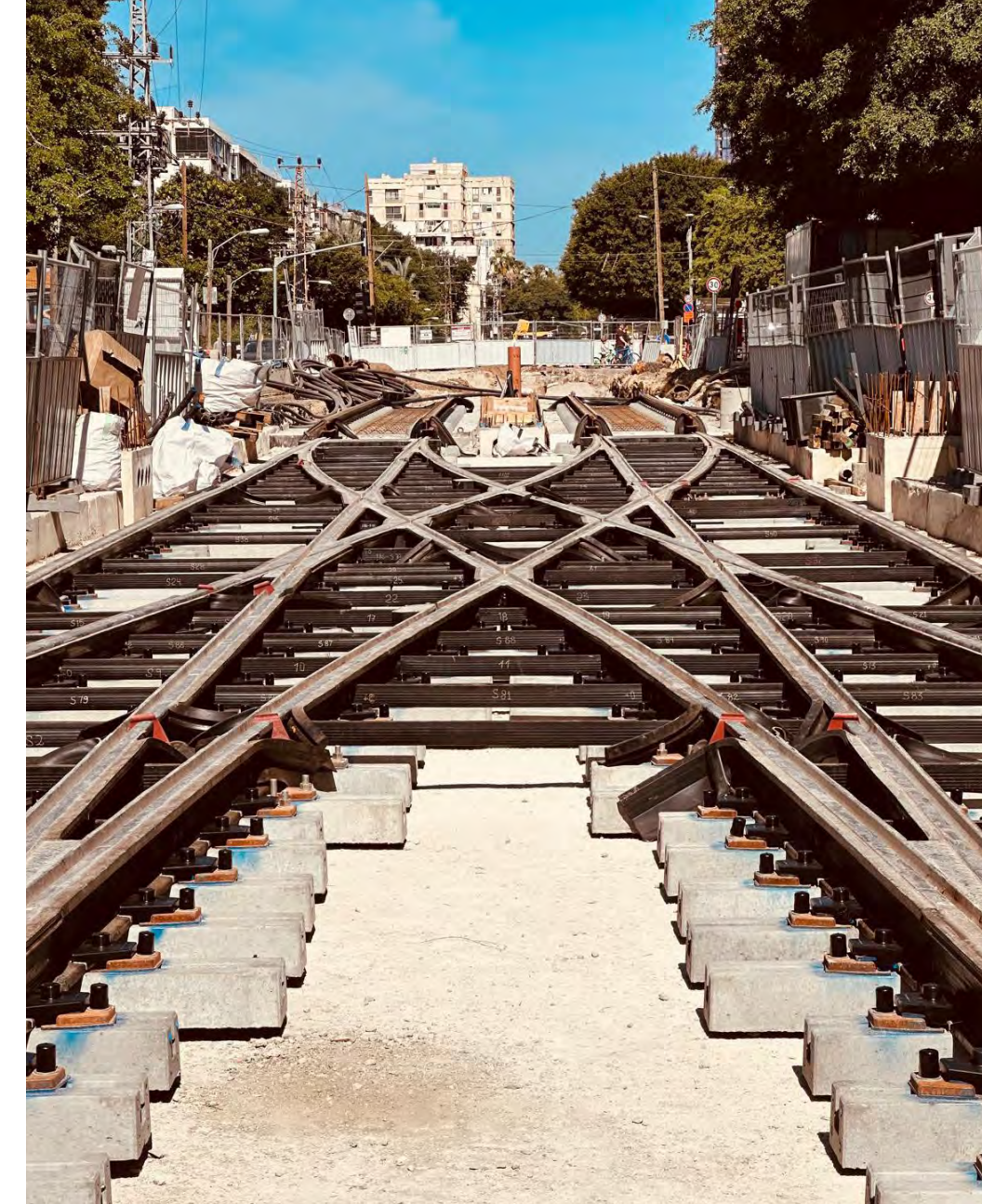


Figure 4
Materiality Matrix



The material themes thereby identified were:

- Staff health and safety
- Business ethics
- Labour practices
- Risk management of critical incidents
- Human rights and relationships with communities

Our Commitment to Sustainable Railways

The core Steconfer business is directly associated with promoting sustainable transport. The company takes pride in contributing towards the railway chain of value, aligning its objectives with those of the European Union for climate neutrality by 2050. Today, rail represents one of the most efficient and ecological means of transporting people and goods.

Strategic Initiatives

Steconfer implements various different initiatives in accordance with the ESG principles, in particular:

- Transitioning to renewable energy sources;
- Digitalising processes and paperless administrative processes;
- Promoting diversity and inclusion in teams;
- Careful selection of suppliers focused on sustainability;
- Investment in more ecological and efficient teams.



Management Systems and Sustainability Policies

The sustainability of business activities is ensured through the rigorous implementation of Steconfer's management commitment based on the following axes:

- Guaranteeing the health and safety of all workers, including subcontractors;
- Responding to market needs and risk management;
- Knowing about the expectations of interested parties;
- Economic progress and robust financial stability;
- Personal and professional development of teams;
- Environmental protection and responsible consumption of resources;
- Clear and continuous communication with all stakeholders.

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IMPACTS AND PERFORMANCE

IMPACTS AND PERFORMANCE

4.1. ECONOMIC DIMENSION

Sustainable Innovation

Innovation is a determinant factor for the railway construction sector, especially as regards adopting sustainable practices. Steconfer has continually sought out solutions capable of reducing waste, boosting efficiency and implementing more ecological technologies.

During 2024, the company advanced with the digitalisation of its administrative and human resource management processes. This digital transformation not only improved internal efficiency but also enabled more rigorous control over the sustainability indicators.

Investments in sustainable innovation reflect in the creation of value for clients, the optimisation of operations and promoting solutions able to benefit both society and the environment.

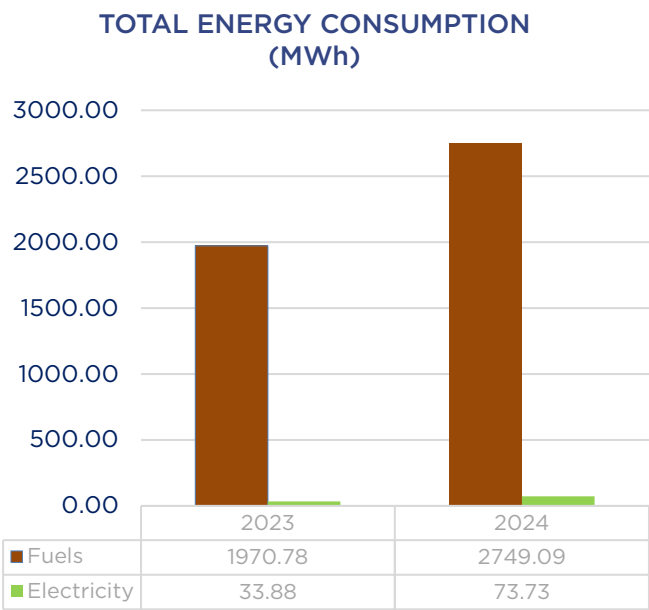


4.2. ENVIRONMENTAL DIMENSION

Carbon

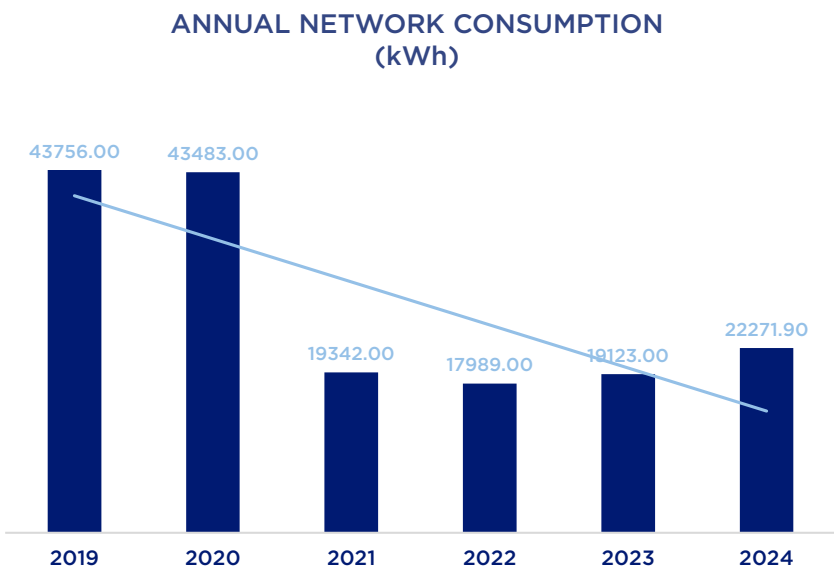
Steconfer has been undertaking a set of actions designed to reduce its carbon footprint, correspondingly highlighting:

- Installation of solar panels in the headquarters in Santarém, with an average self-consumption rate of 77%;

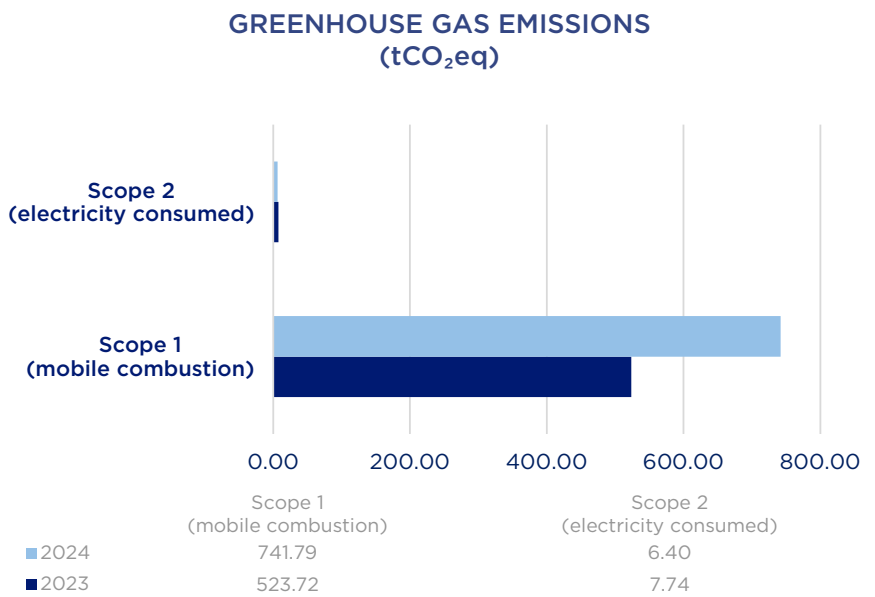


Note: The rise in energy consumption in 2024 stems from accounting for new work sites with the majority of the track work involving heavy equipment for prolonged periods. In the case of electricity, the rise derives from greater utilisation of electric vehicles.

- Optimisation of facilities by installing more energy efficient equipment, producing a reduction of around 55% in energy consumption at the Póvoa de Santarém operations;



- Incentives for electric mobility through the installation of recharging posts in Lisbon and Santarém;
- Progressive transition of the vehicle fleet to electric vehicles taking into account autonomy and regular trajectories;
- Publication in 2024 of the first Greenhouse Gas Emissions Report for 2023 based on the GHG Protocol criteria.



Note: These data follow the GHG Protocol methodology.

INTENSITY OF EMISSIONS	2023	2024
Total of greenhouse gas emissions (tCO ₂ eq)	531.46	748.19
Business turnover(k€)	19,552	19,808
tCO ₂ eq / k€	0.027	0.038

Steconfer is now expanding the measurement of its emissions to include other facets for analysis with a view to obtaining a complete evaluation and thereby setting out a clear path to achieving carbon neutrality by 2050.

Equipment Replacement

There is ongoing analysis and the progression replacement of heavy equipment by electric versions or other models with lower environmental impact in accordance with the decarbonisation strategy.

Natural Resources

The efficient management of natural resources is a consolidated practice at Steconfer with policies focused on reducing consumption, increasing recycling and preserving water and soil.

To reduce the environmental impact, the company controls the contamination of rainwaters at all sites where it operates, including both fixed administrative centres and worksites.

In the Santarém and Lisbon offices, the supply of water is guaranteed by the public network. In Lisbon, sanitation takes place through a municipal system; while in Santarém, effluents are collected by the entity managing the local sanitation system. On worksites, consumption is controlled in accordance with the needs and location in keeping with the nature of the ongoing work.

The following table sets out the levels of consumption for the last two years, identifying the respective zones classified as experiencing water stress.

SITES	2023		2024	
	Water withdrawal (m³)	Water consumption (m³)	Water withdrawal (m³)	Water consumption (m³)
Santarém	444	-	325	-
Lisboa	79.20	-	79.20	-
Mealhada	507	19	410	274.50
Total	1030.20	19	814.20	274.50
Sites in areas of high water stress	586.20	19	489.20	274.50

Source: WRI's Aqueduct Water Risk Atlas

	Water Stress Low - Medium (10-20%)
	Water Stress Extremely High (>80%)

We applied the following calculation for the total of water extracted in shared offices:

(volume of water per utilisation

X

no. of daily utilisations

X

no. of days per year

X

occupation rate)

Total water extracted =

Steconfer does not run any operations in protected or sensitive zones from the biodiversity perspective.

Environmental Risk Management

The evaluation of environmental and social risks is integrated into every Steconfer project from the initial phase. This approach includes

- Environmental Impact Studies and mitigation plans;
- Reduction in dangerous packaging and promoting safe packaging;
- Continuous environmental training and awareness raising among members of staff;
- Monitoring of wastes and local impacts, with particular attention to the communities involved.

Circular Economy

Steconfer applies circular economy principles in various project phases. Concrete examples include:

- Reuse of drainage ballast and platform building materials;
- Recycling of concrete beams, repurposing them as crushed material;
- Repairing accessories and equipment to prolong their working lives and reduce waste.

	2023 (ton)			2024 (ton)		
	Total	Non-dangerous	Dangerous	Total	Non-dangerous	Dangerous
Waste generated	735	724	11	2148	2132	16

	2023	2024
Total of recycled or reutilised waste	724	1517



4.3. SOCIAL DIMENSION

Diversity and Inclusion

Steconfer promotes a respectful, inclusive and multicultural working environment, across its operations in 10 countries and the 21 nationalities represented in its teams. Internal company policies guarantee:

- Equality of opportunity;
- No discrimination;
- Merit based promotion and gender diversity.

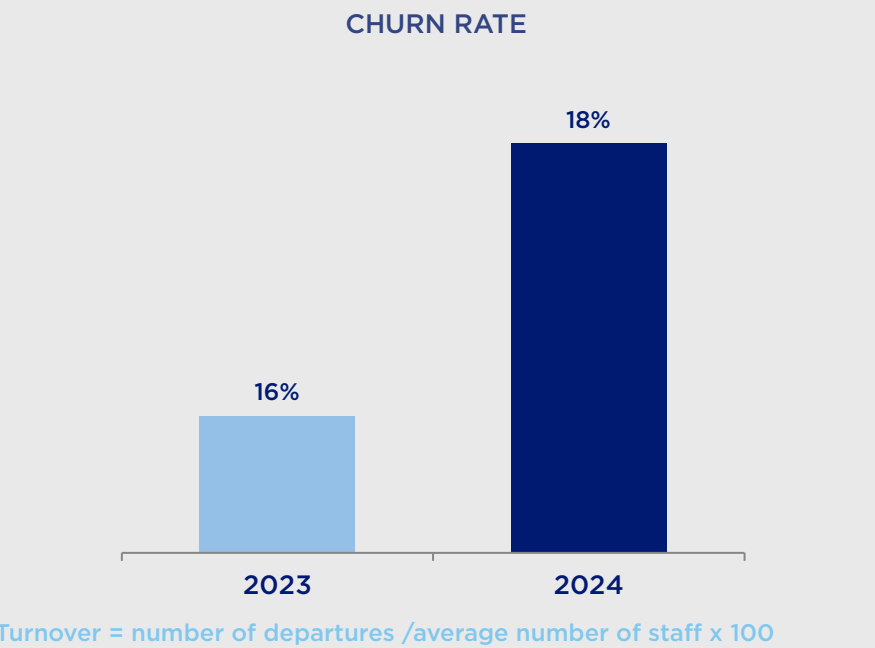
	2023	2024
GENDER DIVERSITY	Number of employees	
PRODUCTION		
Male	162	155
Female	5	3
TOTAL	167	158
ADMINISTRATIVE (Backoffice)		
Male	18	20
Female	14	20
TOTAL	32	40

GENDER DIVERSITY IN MANAGEMENT POSITIONS: 0.20
(1 female for every 5 males in management positions)

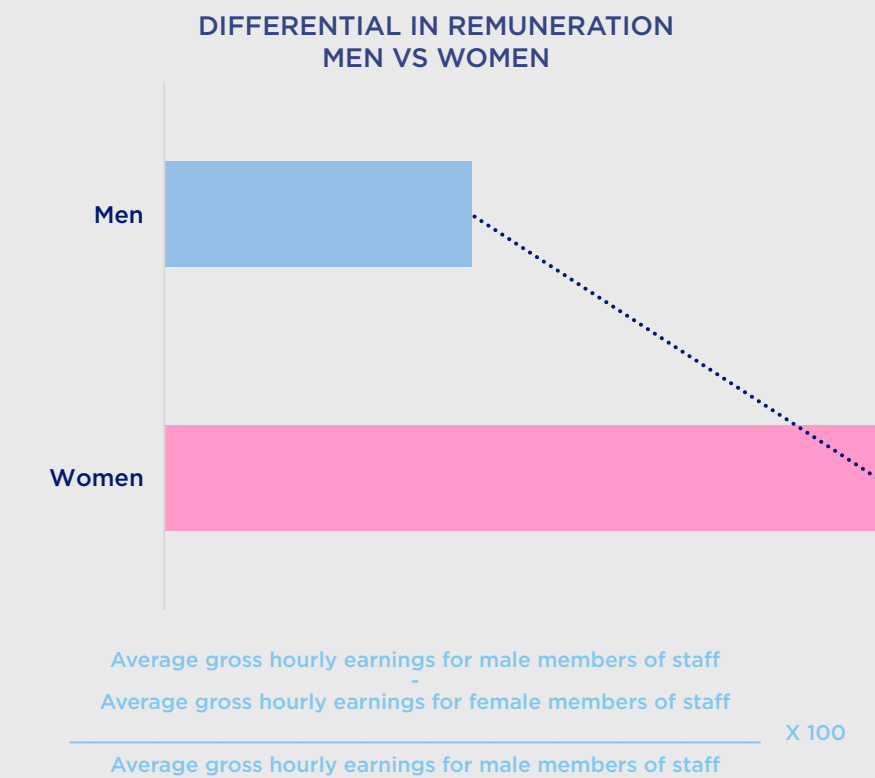
Human Capital

Personal valuation and development are a priority at Steconfer. Key company actions include:

- Continuous training plan, spanning technical, personal and safety competences;
- Promoting further education among operational staff;
- Evaluating performance by competences and objectives;
- Salaries above the national minimum wage and average salaries higher than those of competing companies in the sector.



All members of staff are covered by a collective agreement (100%)



Workplace Health and Safety

The safety of our staff is a core pillar of action at Steconfer, with constant investment in:

- Awareness and training campaigns;
- Identification and control of risks;
- Support from safety specialists and a workplace doctor;
- Distribution of individual protection equipment;
- Safety insurance for all employees.

Ever since 2018, Steconfer has maintained its Workplace Health and Safety Management System certified under norm ISO 45001, reflecting its continuous commitment towards the prevention of risks and ensuring a safe and healthy working environment for all members of staff.

	2023			2024		
	Total	WA with medical leave	WA without medical leave	Total	WA with medical leave	WA without medical leave
Workplace Accidents	9	0	7	6	1	16
Frequency rate	4.93	-	3.55	3.05	-	
Frequency rate = No. of Workplace Accidents / No. of hours worked x 200,000						
Fatal accidents		0			0	
Profession related diseases		0			0	

Steconfer’s investment in health and safety significant contributes towards both lowering the accident rate and raising competitiveness in enabling a consistent reduction in operating costs.

Commitment to the Community

Steconfer recognises how its projects directly impact on the lives of the surrounding community. Hence, the company strives to ensure:

- Continuous dialogue with the local population;
- Minimisation of the negative impacts during project implementation;
- Contracting local resources and companies, strengthening the regional economy;
- Promoting long lasting structural benefits, such as better mobility and quality of life;
- Sponsorship and donations to institutions holding social objectives.

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GOVERNANCE AND ETHICS

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Code of Ethics and Business Conduct

The Steconfer Code of Ethics and Conduct establishes the fundamental principles for the professional behaviour and responsibilities that prevail in company actions. This applies transversally to all members of staff and partners irrespective of their position or geographic location.

This document guides ethical decision-making and serves as the base for integrity and transparency in relationships with all stakeholders.

Complementary Policies

Steconfer recently deepened its commitment towards ethical, sustainable and responsible practices through the implementation of the following specific policies:

- Child Labour, Forced Labour and Human Trafficking Policy
- Social Dialogue and Human Rights Policy
- Career Management and Continuous Training Policy

These policies consolidate the company approach to the protection of human rights, the development of talent and healthy labour relations.

Corporate Ethics

Ethics are transversal to all Steconfer activities. The company demands full compliance with its principles and internal regulations, fostering a culture of integrity and responsibility.

An anonymous whistleblowing system was implemented, accessible to all members of staff, as the means to guarantee transparency and identify eventual behavioural shortcomings.

In the period hereby reported on, there were no recorded convictions or sanctions for corruption or bribery.

Commitment to Suppliers

Steconfer works in close collaboration with its suppliers, guaranteeing that the ESG values are rooted throughout the value chain.

The best practices correspondingly adopted include:

- Continuous evaluation of suppliers according to environmental and social performance criteria;
- Promoting partnerships based on trust, responsibility and continuous improvement;
- Sharing of knowledge and best practices for sustainability.

Procurement Management

The company strives to continuously improve its procurement processes in order to guarantee both operating efficiency and the creation of value for sharing with stakeholders. The ESG criteria are incorporated into the selection and evaluation of suppliers and products.



FUTURE TARGETS AND CONTINUOUS IMPROVEMENT

The Steconfer commitment to the Agenda 2030 for Sustainable Development reflects in the adoption of concrete and ambitious goals, aligned with the Paris Agreement and the global objective of limiting the heating of the planet to 1.5°C.

Greenhouse Gas Emission Reduction Targets

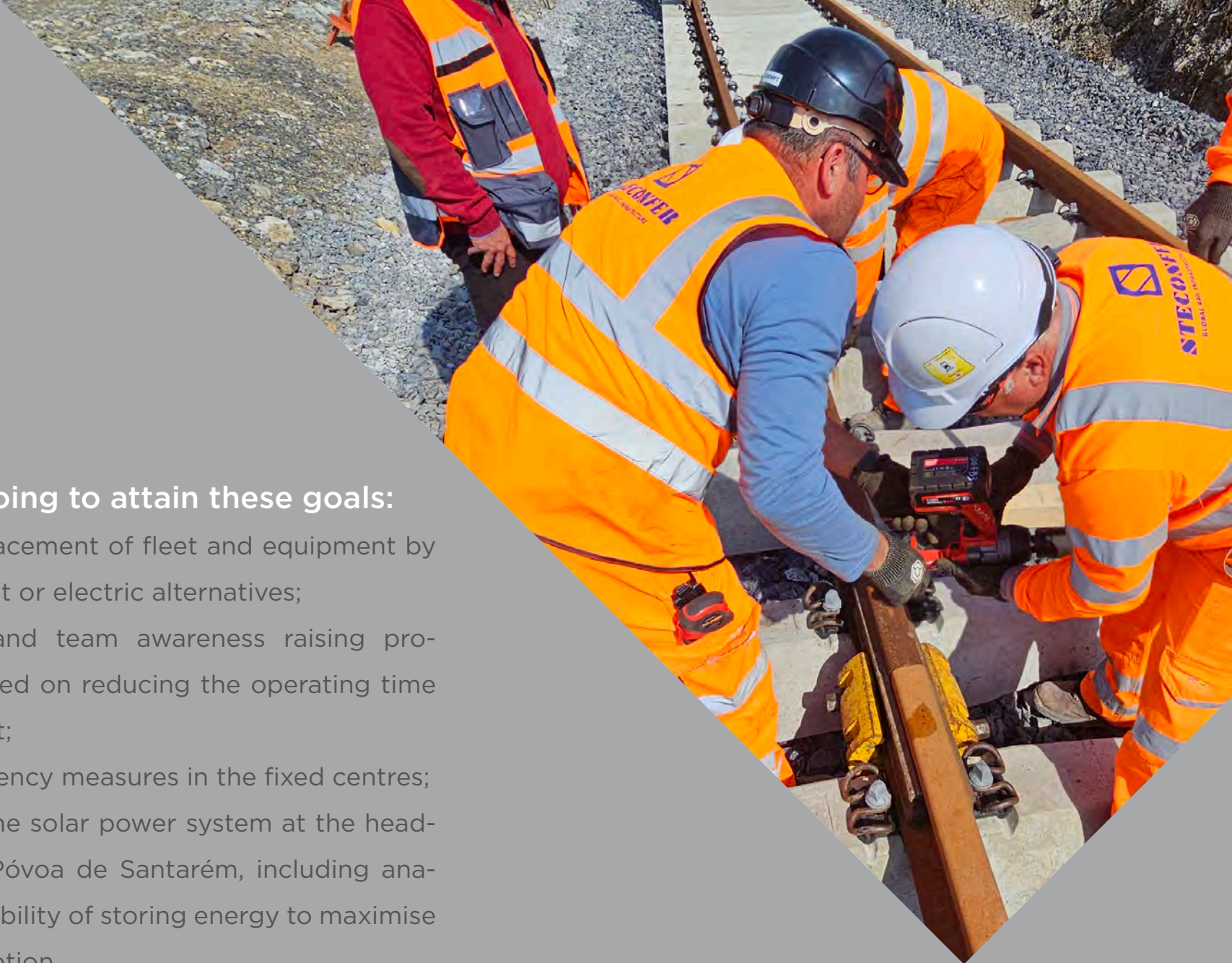
The company attributed priority to the reduction in the intensity of greenhouse gas emissions with the year of 2019 as the reference base:

- Reduction of 42% in scope 1 emissions by 2030 (fleet vehicles, machinery and equipment – transport fuels);
- Reduction of 42% in scope 2 emissions by 2030 (electricity consumption at the fixed Santarém and Lisbon centres, excluding public recharging of electric vehicles).

Actions ongoing to attain these goals:

- Gradual replacement of fleet and equipment by more efficient or electric alternatives;
- Monitoring and team awareness raising programs, focused on reducing the operating time of equipment;
- Energy efficiency measures in the fixed centres;
- Expanding the solar power system at the headquarters in Póvoa de Santarém, including analysing the viability of storing energy to maximise self-consumption.

These actions strengthen the transition of Steconfer to cleaner and more aware operations and aligned with the global environment challenges.

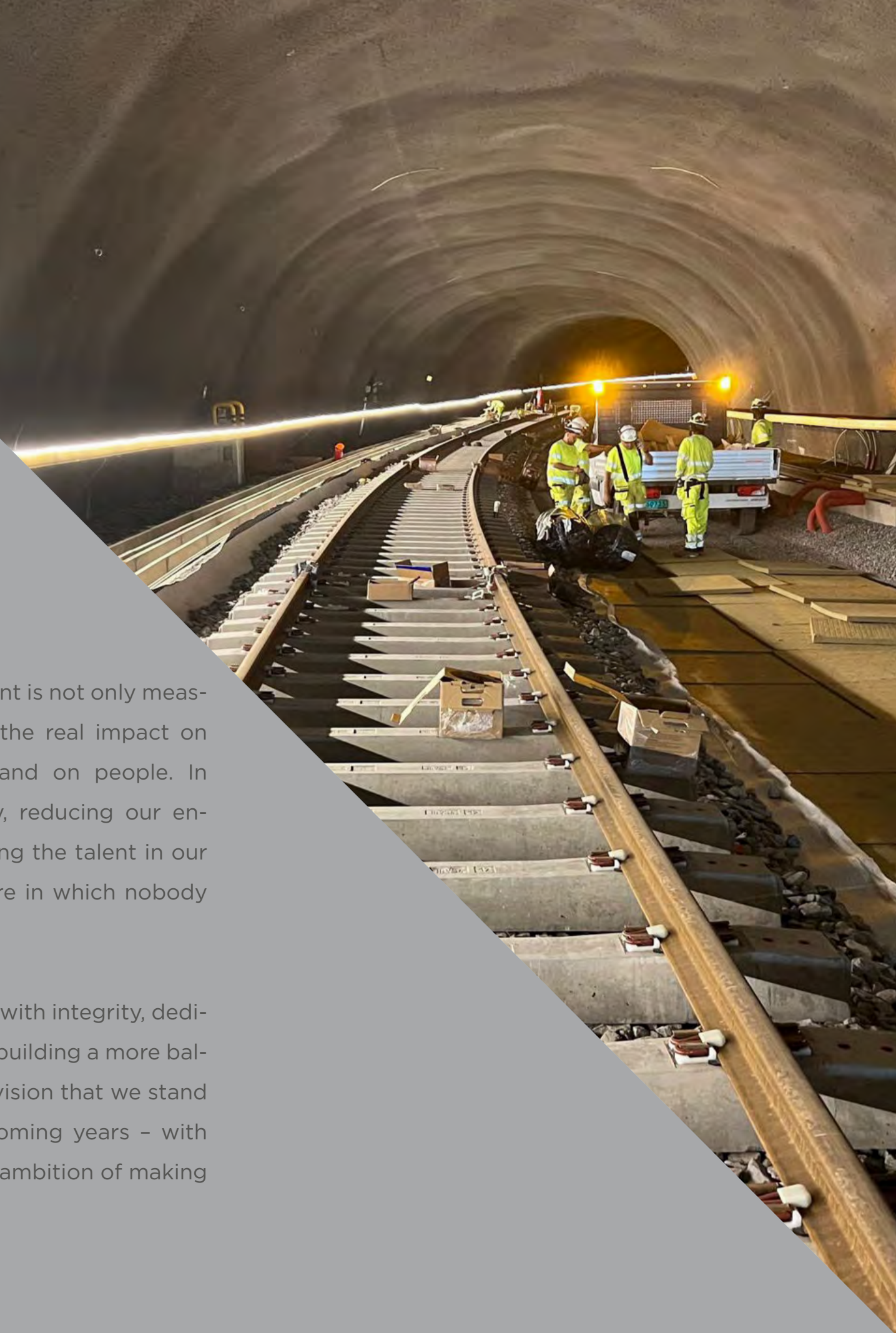


The path towards sustainability is not linear – it is made up of conscious choices, firm commitments and continuous improvement. In 2024, Steconfer strengthened its role as a global company with local responsibilities: an organisation that builds both physical connections - and alongside social, environmental and human connections.

We believe that each project, each decision and each gesture makes a difference. Hence, we assume sustainability as a long term commitment that challenges us to be better, more innovative, fairer, more resilient.

We also believe that development is not only measured by numbers but also by the real impact on communities, on ecosystems and on people. In promoting sustainable mobility, reducing our environmental footprint and valuing the talent in our teams, we contribute to a future in which nobody gets left behind.

We advance in confidence that, with integrity, dedication and cooperation, we are building a more balanced tomorrow. It is with this vision that we stand up to the challenges of forthcoming years – with courage to evolve and with the ambition of making a positive mark on the world.



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ANNEXES

VSME CHAPTER	SUBJECT	INFORMATION	PAGE
BASIC MODULE - GENERAL INFORMATION			
B1 - Basis for preparation			
24.a)	Sustainability reporting option	Communications option B (Basic Module and Extended Module)	
24.b)	Classified or Sensitive Information	No information was omitted on the ground of being considered Classified or Sensitive	
24.c)	Individual/consolidated reporting base	This sustainability report was produced according to an individual base	
24.d)	List of subsidiaries (when making consolidated reports)	Not applicable	
24.e) i.	Legal type and nature	Private liability company, registered with the Santarém Company Registry Office	
24.e) ii.	NACE Code	NACE F-42.12	
24.e) iii.	Balance Sheet Total (k€)	32,768 k€	
24.e) iv.	Business turnover (k€)	19,808 k€	
24.e) v.	Number of employees (FTE)	198	
24.e) vi.	National headquarters	Portugal	
24.e) vii.	Geolocation	Headquarters: Terra da Calçada, Estrada Nacional 3, Km 46,5; 2000-531 Santarém; Portugal; 39° 18' 9.942'''' N; 8° 41' 10.469'''' W Offices: Rua Sinais de Fogo, 8 - 1ºA; 1990-605 Lisbon; Portugal 38° 45' 23.740'''' N; 9° 5' 49.813'''' W	
25.	Sustainability related certifications or distinctions	Steconfer regularly submits its management system to independent evaluation by EcoVadis, with the most recent evaluation taking place in June 2024 and awarded a classification in the Top 35% (Percentile 65 or higher).	

VSME CHAPTER	SUBJECT	INFORMATION	PAGE
BASIC MODULE - GENERAL INFORMATION			
B2 - Practices, policies and future initiatives for transitioning towards a more sustainable economy			
26.a)	Practices	Environmental Dimension- Carbon emissions Steconfer has policies implemented and publicly available for the following areas: <ul style="list-style-type: none">• Sustainability, Quality, Safety and the Environment;• Sustainable procurement;• Social dialogue and human rights;• Career management and continuous training;• Child labour, forced labour and human trafficking.	15
26.c)	Future Initiatives	Environmental Dimension - Carbon emissions Steconfer has defined objectives for: <ul style="list-style-type: none">• Economic Sustainability and Growth;• Continuous Improvement of the Integrated Management System;• Fostering a culture of safety and occupational health and wellbeing throughout the organisation;• Dynamizing communications (internal and external) and enabling the organisational culture;• Fostering and raising awareness about the environment and its protection;• Enhancing human resource competences;• Boosting the efficiency of recruitment processes;• Improving the effectiveness of human resource processes;• Bringing about effective maintenance management.	15

VSME CHAPTER	SUBJECT	INFORMATION	PAGE
BASIC MODULE - ENVIRONMENT METRICS			
B3 - Energy and greenhouse gas emissions			
29.	Total energy consumption (MWh)	Environmental Dimension - Carbon emissions	15
30.	Estimated greenhouse gas emissions (GGE) (tCO2eq)	Environmental Dimension - Carbon emissions	15
31.	GGE intensity (tCO2eq/k€)	Environmental Dimension - Carbon emissions	15
B4 - Pollution of air, water and soil			
32.	Emission of pollutants	Steconfer is not under any legal obligation to report pollutant emissions.	
B5 - Biodiversity			
33.	Installations in areas of biodiversity	Steconfer, S.A. does not own, lease or manage areas in or close to protected areas, sensitive as regards their biodiversity.	
34.a)	Total terrain utilised (ha)	Non-applicable	
34.b)	Total non-permeable area	Non-applicable	
34.c)	Total nature oriented on-site area	Non-applicable	
34.d)	Total nature oriented off-site area	Non-applicable	
B6 - Water			
35.	Water extracted	Environmental Dimension - Water	16
36.	Water consumed	Non-applicable	
B7 - Resource use, circular economy and waste management			
37.	Circular economy principles	Environmental Risk Management - Circular economy principles	17
38.a)	Annual production of waste by type	Environmental Risk Management - Waste Generated	17
38.b)	Annual production of recycled and reutilised waste	Environmental Risk Management - Waste Generated	17
38.c)	Annual mass flow	Taking into consideration the variability in contract types, in which similar activities may incur substantially different material supply requirements, and on various occasions supplied by the actual client, it has not yet been feasible to establish a consistent mass flow level	

VSME CHAPTER	SUBJECT	INFORMATION	PAGE
BASIC MODULE - SOCIAL METRICS			
B8 - Workforce - General characteristics			
39.a)	Type of contracts	Diversity and Inclusion	18
39.b)	Gender diversity	Diversity and Inclusion	18
39.c)	Recruitment countries	Non-applicable	
40.	Churn rate	Human Capital	18
B9 - Workforce - Health and safety			
41.a)	Workplace accidents	Workplace Health and Safety	19
41.b)	Fatal accidents and professional diseases	Workplace Health and Safety	19
B10 - Workforce - Remuneration, collective bargaining and training			
42.a)	Base remuneration	Human Capital	18
42.b)	Remuneration differentials	Human Capital	18
42.c)	Collective employment contract	Human Capital	18
42.d)	Hours of training	Monitoring has not yet been implemented of the number of hours of training per employee discriminated by gender.	
BASIC MODULE - GOVERNANCE METRICS			
B11 - Convictions and fines for corruption and bribery			
43.	Convictions and fines for corruption and bribery	There were no incidents of convictions or fines for corruption and bribery.	

VSME CHAPTER	SUBJECT	INFORMATION	PAGE
COMPREHENSIVE MODULE - GENERAL INFORMATION			
C1 - Strategy: Business Model and Sustainability - Related Initiatives			
47.a)	Significant groups of products and/or services	Company Profile	5
47.b)	Significant markets in which the company operates	Company Profile	5
47.c)	Key commercial relationships	Company Profile	5
47.d)	Key strategic factors that interrelate with or impact on sustainability issues	Company Profile	5
C2 - Description of practices, policies and future initiatives for transitioning towards a more sustainable economy			
48.	Specific practices, policies and future initiatives for transitioning towards a more sustainable economy	Environmental Dimension - Carbon emissions	15
49.	Highest level of the company responsible for their implementation	The highest level of the company responsible for implementing the specific practices, policies and future initiatives for transitioning towards a more sustainable economy is the ESG Officer.	
COMPREHENSIVE MODULE - ENVIRONMENT METRICS			
C3 - GHG reduction targets and climate transition			
54.a)	Target year and value for the target year	Future Targets and Continuous Improvement	23
54.b)	Base year and value for the base year	Future Targets and Continuous Improvement	23
54.c)	Units used for objectives	Future Targets and Continuous Improvement	23
54.d)	Proportion of Scope 1, Scope 2	Future Targets and Continuous Improvement	23
54.e)	List of key actions	Future Targets and Continuous Improvement	23
55.	Plan for the transition to mitigating climate change	No plan for the transition to mitigating climate change has yet been produced	
56.	Will one be adopted and when?	A plan for the transition to mitigating climate change is not yet included in the action plan.	

VSME CHAPTER	SUBJECT		INFORMATION	PAGE
COMPREHENSIVE MODULE - ENVIRONMENT METRICS				
C4 - Climate risks				
57.a)	Risks related to the climate and transition events		The identification and evaluation of risks interrelated with the climate, transition events related with the climate and severe climate risks, as well as the respective control and mitigation measures are ongoing.	
57.b)	Evaluation of the exposure and sensitivity of assets, activities and the chain of value			
57.c)	Temporal horizons for risks related with the climate and transition events			
57.d)	Actions for adaptation to climate change and climate and transition event related risks			
58.	Potential adverse effects of climate risks that may impact on financial performance and/or commercial operations		The identification and evaluation of the risks related with the climate, transition events related with the climate and severe climate risks, as well as the respective control and mitigation measures are ongoing.	
COMPREHENSIVE MODULE - SOCIAL METRICS				
C5 - Additional (general) workforce characteristics				
59.	Proportion women/men at the management level		Diversity and Inclusion	18
60.	Freelance staff and Temporary workers		Diversity and Inclusion	
C6 - Additional own workforce information - Human rights policies and processes				
61.a)	Code of conduct or human rights policy, including:		A Code of Ethics and Business Conduct, complemented by the following specific policies:	
61.b) i.	Child labour		Child Labour, Forced Labour and Human Trafficking Policy	
61.b) ii.	Forced labour			
61.b) iii.	Human trafficking			
61.b) iv.	Discrimination		Social Dialogue and Human Rights Policy	
61.b) v.	Accident Prevention		Sustainability, Quality, Safety and Environment Policy	
61.b) vi.	Other		Career Management and Continuous Training Policies	
61.c)	Mechanism for handling complaints		Whistleblower Channel	

VSME CHAPTER	SUBJECT		INFORMATION	PAGE
COMPREHENSIVE MODULE - SOCIAL METRICS				
C7 - Severe negative human rights incidents				
62.a)	Confirmed incidents related with:			
62.a) i.	• Child labour	No		
62.a) ii.	• Forced labour	No		
62.a) iii.	• Human trafficking	No		
62.a) iv.	• Discrimination	No		
62.a) v.	• Others	No		
62.b)	Actions that are underway to deal with the aforementioned incidents		Non-applicable	
62.c)	Confirmed incidents involving workers in the chain of value, affected communities, and final users		Steconfer has no knowledge of any incident involving workers in the chain of value, affected communities, consumers or final users.	
COMPREHENSIVE MODULE - GOVERNANCE METRICS				
C8 - Revenues from certain sectors and exclusion from EU reference benchmarks				
63.a)	Weapons		Steconfer does not operate in the weapons, tobacco cultivation or fossil fuel sectors, produce chemicals such as pesticides or agrochemicals.	
63.b)	Cultivation and production of tobacco			
63.c)	Fossil fuels			
63.d)	Chemical products			
64.	EU benchmarks aligned with the Paris Agreement		Steconfer was not excluded from the EU benchmarks aligned with the Paris Agreement.	
C9 - Gender diversity ratio in the governance body				
65.	Diversity of gender on governance bodies		Gender diversity ratio = 0 (Number of female members / Number of male members)	

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