SANTANDER PORT AUTHORITY

ENVIRONMENTAL REPORT 2021



INDEX

- 1. PRESENTATION
- 2. THE SANTANDER PORT AUTHORITY
- 3. ENVIRONMENTAL MANAGEMENT
- 4. INTEGRATED MANAGEMENT POLICY
- 5. SIGNIFICANT ENVIRONMENTAL ASPECTS AND IMPACTS
- **6. MANAGEMENT OF ENVIRONMENTAL ASPECTS**
- 7. LEGAL REQUIREMENTS
- 8. STAKEHOLDERS' NEEDS AND EXPECTATIONS
- 9. OBJECTIVES, ACTIONS AND PROGRAMS



1. PRESENTATION

Santander Port Authority considers that port development must be linked to environmental protection and social cohesion.

In this sense, in addition to having an integrated quality and environmental management system certified under the UNE-EN ISO 9001:2015 and 14001:2015 Standards, it has been developing environmental protection initiatives that try to achieve the desired balance between commercial and economic growth and the protection of the natural and social environment, in favor of sustainable development.

The strategic line of environmental protection of the Port Authority of Santander includes the following actions:

- ⇒ Establishment and annual monitoring of sustainability objectives, which are part of the Business Plan. In 2021-22, progress has been made in achieving the following:
 - Implementation of EMAS, community regulation focused on promoting the commitment to continuous improvement and transparency in relation to the environmental behavior of the organization. Pending verification and registration during the current year.
 - Surveillance and management of the quality of port waters. Port waters are included within the scope of application of the Water Framework Directive (WFD). In order to respond to the requirements of the WFD and the needs of port management, "ROM 5.1-13: Quality of coastal waters in port areas" has been updated. There are 4 action programs: the program for the delimitation and typification of the Port Aquatic Management Units, the program for the evaluation and management of environmental risks; the environmental quality monitoring program and the pollution episode management program.
 - Monitoring of the quality of contaminated soil. A Work Plan on contaminated soils
 has been designed with a Geographic Information System (SIG), geographically
 locating the existing concessions, and associating the basic characteristics for the
 management of legal obligations regarding contaminated soils, as well as the control
 of the possible sources of contamination and evolution both in soils and in port
 waters.
 - Acoustic impact monitoring. An acoustic measurement campaign has been carried out to assess the noise of ferries, cruise ships and works close to citizens, which object had been prevention and data collection to give continuity to the acoustic impact assessment study at the Maritime Station.
 - Energy efficiency. A feasibility study has been carried out on the implementation of energy generation alternatives using renewable sources to supply the Port Authority's facilities, mainly on building roofs (photovoltaic energy) and plots (wind energy).
- ⇒ Port infrastructure development projects, in which the environmental approach is also taken into account and among which it is worth highlighting:
 - Reform of the ferry terminal (boarding parking): apart from improving passenger services, this reform allows the permanent parking of semi-trailers to be moved away from the noble area of the sea front, within the framework of improvements in port-city actions.

- Development, in the public automobile terminal, of a high-rise storage silo, which allows for more efficient use of the land to attend to the global traffic operations of automobiles, machinery, platforms and semi-trailers that have been increased during the last two decades. The infrastructure prevents the bay from being filled for reasons related to environmental sustainability. The ground floor and first floor are in use and will be expanded by nearly 230,000 square meters spread over three floors.
- New land access to the Port of Santander from the motorway A-67, about to end this year, which will serve to distribute road traffic at this point, one of the highest densities in the Cantabrian capital. The new access will help improve circulation in a key area both for the transit of cars and goods. Thanks to this infrastructure, all vehicles entering and exiting the Port will be channeled through a totally independent access and the traffic that runs through the two existing links will be reduced.
- ⇒ Environmental control of port services and activities through Environmental Regulations in which the obligatory code of conduct for port users is established.
- ⇒ Incentives to promote private investment in facilities and equipment (specialized terminals, etc.) that improve the environmental aspects of operations, through the environmental bonuses contemplated in the good practice agreements provided for in art. 245.1.b of the revised text of the State Ports Law. In this sense, the investments made in 2021 by the three companies subject to these agreements stand out:
 - NOATUM Multipurpose Terminal: Conditioning and modification of old hoppers to improve working conditions, from the environmental and occupational safety point of view
 - NOATUM Santander Terminal: Installation, in its warehouse, of a mineral distribution system to optimize its space (moving belt, instead of front shovels)
 - TASA: Installation for the use of rainwater and construction of a shed for storage of hazardous waste containers
- ⇒ Extension of the implementation of environmental management systems to providers of port services, commercial services and specialized terminals, container terminal and LNG terminal, through clauses in the specifications, practically all of them being certified in ISO 14001 and/or EMAS.

2. PORT AUTHORITY OF SANTANDER

Port Authority of Santander is a state-owned corporate entity, attached to the Ministry of Transport, Mobility and Urban Agenda, which administers and manages the port service area of the port of Santander.

As part of Spanish port system, it has its own legal personality and assets - as well as full capacity to act - and is governed by its specific legislation (Consolidated Text of the State Ports and Merchant Marine Law, approved by Royal Decree 2/2011, of September 5), by the provisions of the General Budgetary Law that are applicable to it and, additionally, by Law 40/2015, of October 1, on the Legal Regime of the Public Sector.

From its point of view as a company that generates economic activity, the Santander Port Authority complies with private law even in its acquisitions and contracts.



GOVERNANCE AND MANAGEMENT

The government, management and assistance entities of the Port Authority are regulated in the Consolidated Text of the State Ports and Merchant Marine Law, applicable to the entire state port system.

Board of directors

It has the function of managing and governing the port, deciding on the most important and global issues both at the budgetary and financial level as well as at the internal operating level.

The members of the Management board are the President of the Port Authority, the Maritime Captain, the Director and the Secretary of the Administration Council. In addition, it has representation from the following institutions:

- Autonomous Community of Cantabria: 4 members

- General State Administration: 2-3 members

- Santander City Council: 1 member

- Camargo City Council: 1 member

- Official Chamber of Commerce, Industry and Navigation of Santander: 1 member

- Unions: 1 member

Confederation of Business Organizations and SMEs of Cantabria: 1 member

President

Appointed by the competent body of the Autonomous Community, it is responsible for ensuring compliance with the guidelines of the State Ports, as well as the applicable regulations, in addition to representing the Port Authority and its Board of Directors.

Director

Appointed by the Board of Directors, director is in charge of investment planning, direction and ordinary management of the entity and its services, being main responsible for the daily management of the Port Authority and the activity and operations of the port in its set.

The Port Authority of Santander is organized into areas, departments and divisions as contemplated in the current Organizational Chart.

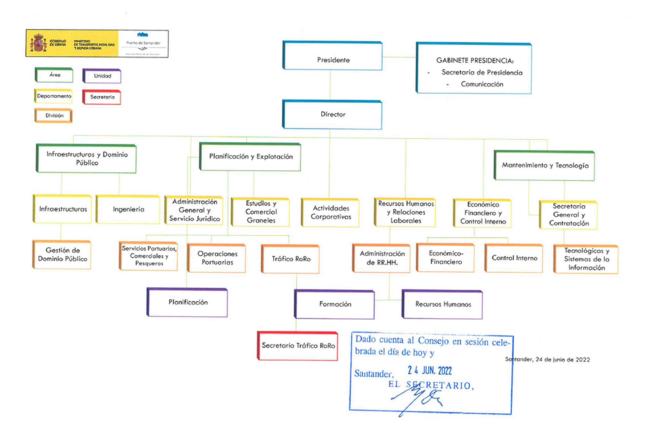


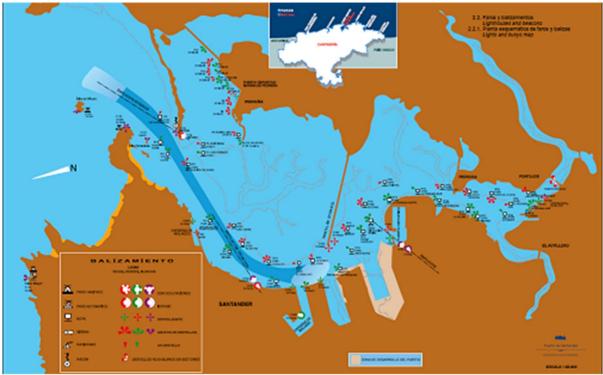
Image: Santander Port Authority organization chart

NATURE AND SIZE OF PORT ACTIVITIES

One of the main activities of the Santander Port Authority is to provide adequate port infrastructure for local, regional and national economic development, adapting its facilities to the needs of maritime traffic, to integrate into the main international trade logistics chains.

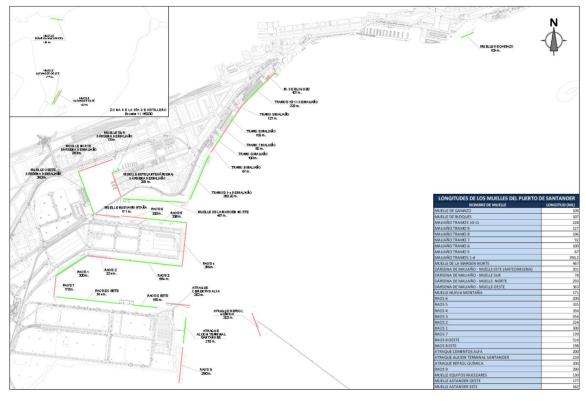
The Santander Port Authority manages a floating area of approximately 3,400 Ha, as well as a useful land area of 284 Ha.

The port of Santander is located inside the estuary of the bay of Santander and access to its docks is through the navigation channel, which allows the entry of ships with a draft of up to 13 m, without length restrictions or breadth at high tide.



Access channel and beaconing of the Port of Santander

The port of Santander has 5,236 meters of commercial docks and its covered storage capacity is $121,488 \text{ m}^2$ and uncovered storage capacity is $542,538 \text{ m}^2$.



Docks General Map

ENVIRONMENTAL REPORT 2021. SANTANDER PORT AUTHORITY

Main activity in each zone is as follows:

- RAOS 1 dock: solid bulk
- RAOS 2, 3, 4 and 5 docks: solid bulk and general merchandise
- RAOS 7 and 8 Docks: vehicles and other ro-ro goods, as well as general merchandise.
- North Bank: ro-ro, general merchandise and cargo
- Maliaño Docks: ferries and cruise ships (sections 10-11) and ro-ro goods and auxiliary ships (sections 1-7)
- Blocks: cruise ships, ferries and ro-ro goods

In addition, the port of Santander has an area for fishing activities that includes a fish market managed directly by the Port Authority.

There are also three sports docks - with an offer of more than 1,300 moorings - located in the north, east and west of the bay.



SERVICES PROVIDED

The Port of Santander provides all services contemplated in current legislation, which are regulated by the Port Authority through the corresponding Specifications and granting of licenses so that they are provided under conditions of competition, free access, quality, safety and respect for the environment.

- ⇒ General services: they are provided directly by Port Authority or are contracted with other entities and are essential for the operation of the port system:
 - Management, coordination and control service for port traffic, both maritime and land, and operations associated with port and commercial services
 - Signaling, beaconing and other navigation aid services that serve as approach and access of the ship to the port, as well as its internal beaconing.
 - Police service, lighting, regular cleaning of common land and water areas.
 - Emergency prevention and control service.
- ⇒ Port services: necessary for the development of basic commercial port activities associated with maritime traffic. They are provided by private companies on a free competition basis.
 - Pilotage service (1 company)
 - Port towing service (2 companies)
 - Mooring and unmooring service (2 companies)
 - Passenger service (there is no company providing the service)
 - Reception service for waste generated by ships, which includes the annexes of the MARPOL 73/78 Convention (3 companies)
 - Merchandise handling service, which consists of loading, stowage, unloading, maritime transit and merchandise transshipment (8 companies)
 - Supply of fuel to ships (6 companies)
- ⇒ Commercial services: provided directly by Port Authority or by third parties, necessary for the development of port activity
 - Ship consignment (14 companies)
 - Ground transportation
 - Water, electricity and oil supply (6 oil supply companies)
 - Boat repair
 - Provision of ramps and walkways
 - Fish market management
 - Etc.
- \Rightarrow Maritime signaling service, provided by the Port Authority
 - Installation, maintenance, control and inspection of visual, acoustic, electronic or radioelectric devices intended to improve the safety of navigation in the coastal sea of the Cantabrian coast

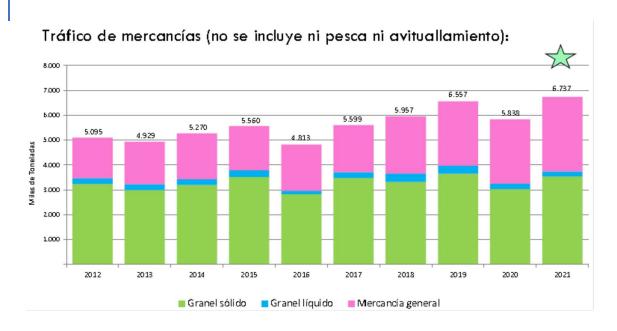


TRAFFIC

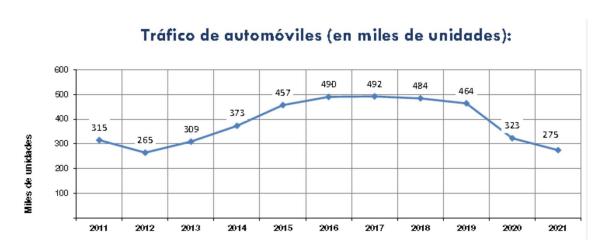
The port of Santander mainly handles solid bulk - which represents more than 50% of total traffic - and general merchandise, which represents almost 45% of the total and is increasing every year.

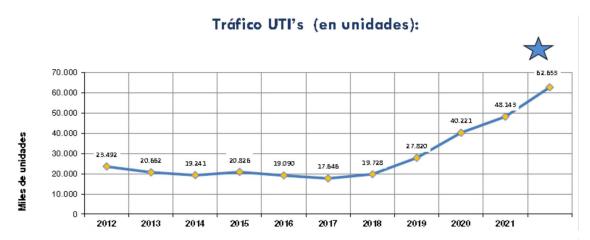
Freight traffic has increased in 2021, compared to 2020 - when it was reduced as a result of the pandemic -, reaching levels higher than 2019 and registering the best historical data.

Santander exchanges merchandise with almost a hundred countries, but more than 50% of the traffic is distributed between the United Kingdom, Belgium and Brazil.









Tráfico total (incluye pesca y avituallamiento)

(En toneladas)	AÑO 2021	AÑO 2020	AÑO 2019	Variación 2021/2020	Variación 2021/2019
TRAFICO TOTAL	6.767.563	5.866.719	6.586.231	15,4%	2,8%

Según la forma de presentación (no incluye pesca ni avituallamiento)

(En toneladas)	AÑO 2021	AÑO 2020	AÑO 2019	Variación 2021/2020	Variación 2021/2019
GRANELES LIQUIDOS	208.051	213.696	323.611	-2,6%	<i>-35,7%</i>
GRANELES SOLIDOS	3.537.849	3.026.139	3.646.528	16,9%	-3,0%
MERCANCIA GENERAL	2.990.966	2.597.899	2.586.789	1 5 ,1%	15,6%
TOTAL	6.736.866	5.837.734	6.556.928	15,4%	2,7%

Ferry traffic (roro and passengers), which has been linking Santander with the United Kingdom for decades, has been affected in the last two years by the pandemic and Brexit, so that the number of stopovers and merchandise has been lower in 2021 than in previous years.

However, passenger traffic has recovered compared to 2020. And to a greater extent, passenger cars that accompany the passenger.

	AÑO 2021	AÑO 2020	AÑO 2019	Variación 2021/2020	Variación 2021/2019
ESCALAS	143	153	246	-6, 5 %	-41,9%
PASAJEROS	118.975	73.244	206.348	62,4%	-42,3%
TURISMOS PASAJE (unidades)	51.150	30.046	72.647	70,2%	-29,6%
MERCANCIA (unidades)	12.895	15.245	18.169	-1 5,4 %	-29,0%
MERCANCIA (toneladas)	343.360	438.455	520.083	-21,7%	-34,0%

Private merchandise terminals, under concession, are used to handle 35% of the total traffic.

The number of companies that operate in the port under a concession or authorization regime is indicated in the following table.

Concessionaire companies or companies with private occupation authorization of the public domain linked to the movement of goods, passengers, fishing, nautical sports or shipbuilding and repair.

occupation type	Number of Companies	
Concessions	213	
Authorizations	32	

The land area under concession occupies 1,562,000 m² compared to 2,057,000 m² for concession, so the land area for commercial use under concession represents 76%.

INITIATIVES

The Port Authority of Santander continuously develops initiatives to promote port activity, increasing the port land under concession. Actions carried out in 2021:

- ⇒ New CLdN: Authorization granted in October 2021, increasing surface area by 34,000 new m² (previously it was 43,600 m²). The entry of a new CLdN scale is planned for 2022, which will foreseeably entail a new increase in surface area.
- \Rightarrow New container terminal: 67,000 m² plus concessions.
- ⇒ New fertilizer terminal: 10,000 m² plus concessions. It is expected to come into operation in August 2022.
- ⇒ LNG bunkering terminal: 5,000 m² plus concessions. Start of work in October 2021. Start of civil works in February 2022.
- ⇒ Extension of the water surface, for the installation of berths for sports boats, in 9,000 m². Delivered environmental impact study to the Ministry (MITECO) for prior evaluation and review by Puertos del Estado. Sectoral reports sent by MITECO in December 2021. Expected for 2022 under the condition of including environmental conditions.
- ⇒ Global reorganization of the water surface in the Fishing District: under study.
- ⇒ Vertical silo: 50% of the first phase in operation. The other 50% in use in October 2022.
- ⇒ Provision of new land for operators: development of the ZAL completed; surface currently used by Project Cargo. This area continues to be valued.
- ⇒ Initiative related to Actimarsa: carried out a detailed analysis of the transmissions with port interest by area or location so that Santander Port Authority exercises the right of first refusal and withdrawal. Plot recovery actions to make them available to operators to optimize the occupancy ratio of port plots. Continuous process to grant new concessions and authorizations in plots of Actimarsa.
- ⇒ Land valuation: lower occupancy rates making port operators more competitive. The public information procedure ended without allegations.

3. ENVIRONMENTAL MANAGEMENT

Santander Port Authority has an integrated quality and environmental management system, certified since 2003, as well as an occupational health and safety management system certified since 2014.

In addition, in 2022, steps are being taken to join the PERS system - specific to the port sector (according to the model proposed by EcoPorts) - and adherence to the EMAS Regulation (EC Regulation No. 1221/2009 and later, which modify it).

The Infrastructure and Public Domain Area leads the integrated quality and environment management system, counting for this on a person in charge of the system who is in charge - among other things - of coordinating the maintenance of the processes that comprise it and of informing to the Management on performance and improvement needs, ensuring compliance with the reference requirements.

Dock supervision tasks are carried out mainly by the Port Police. However, all the personnel of the Port Authority of Santander are involved in the management system and participate in it in accordance with the procedures and instructions drawn up for this purpose.

Additionally, the functions and responsibilities of each of the areas, divisions, departments and units that make up the organization chart are described in the "Manual of functions and responsibilities in matters of quality and the environment", prepared - among other things - to give compliance to section 1.3 PERS.

Finally, the Port Authority promotes the environmental awareness of its staff through the following measures:

- ⇒ Dissemination of the policy and documents of the integrated management system, as well as of a Welcome Manual for newly hired staff
- ⇒ Quarterly monitoring of the status of the operational objectives and indicators of the processes, as well as the improvement measures proposed
- ⇒ Publication of the annual sustainability report
- ⇒ Environmental training courses, as well as regular distribution of an environmental information bulletin
- ⇒ Marine pollution episode drills (or other situations with environmental risk)



4. INTEGRATED MANAGEMENT POLICY

The Quality and Environment Policy of the Port Authority is available for its stakeholders on the website: http://www.puertosantander.com

This Policy reflects the commitment of the Port Authority of Santander with, among others, the protection of the environment, the prevention of pollution, compliance with legal requirements and continuous improvement in the environmental field (section 1.1 PERS).

INTEGRATED MANAGEMENT POLICY

The Santander Port Authority manages maritime and land operations related to port traffic and services, as well as the port public domain, responding to its mission of providing quality logistic and port services to its users, contributing to economic development and improving its social and natural environment.

The vision that establishes the actions of the Port Authority of Santander is focused on:

- Its customers know and recognise the Port of Santander for the innovation, quality and efficiency of its logistics and port services, as well as for its respect for the environment.
- Operators find in the Port of Santander a reliable and efficient framework of collaboration for the performance of their activities.
- Employees are aware of quality and environmental issues, as well as motivated by job stability and work-life balance.
- The socio-economic environment recognises the Port of Santander for its ethical and environmental conduct.

The priority objective of the Port Authority of Santander is to be a green, sustainable and intelligent port, acting as a green catalyst for the rest of the logistics chain and the goods managed in the port. To this end, it is deploying an environmental strategy based on three fundamental axes:

- Digitalisation of processes and implementation of an intelligent Big Data platform for control and decision-making in the fields of air, water and soil quality, as well as waste management.
- The establishment of sustainable development objectives, specifically in the areas of energy efficiency, water management, circular economy and partnership building, with specific targets to be achieved in the next five
- Decarbonisation of the system and reduction of the carbon footprint, through the convergence of the two previous axes.

The Port Authority of Santander has an integrated quality and environmental management system, which includes the following principles of action:

- To understand and, as far as possible, satisfy the needs and expectations
 of interested parties, to ensure the sustainability of port and logistics
 services, establishing an Environmental Sustainability Plan.
- To develop its strategic objectives, based on the analysis of the organisation's context and considering the three aforementioned axes.
- To carry out a process-oriented management, considering the risks and opportunities associated with them and applying the principle of continuous improvement, innovation and environmental protection.

ENVIRONMENTAL REPORT 2021. SANTANDER PORT AUTHORITY

- Allocate the necessary resources human, technological and financial to achieve the established environmental and quality objectives.
- Operate within the framework of the legislation applicable to its functions and activities, as well as comply with other requirements from interested parties or voluntary agreements.
- Prevent, control and minimise pollution through the application of appropriate and feasible organisational and technological measures, within the framework of its competence and in cooperation with the port companies and other Public Administrations.
- Integrate environmental aspects in the planning, management and conservation processes of the port public domain, as well as in the execution of works and the provision of services, promoting the environmental improvement of the port service area.
- Encourage the motivation, participation and awareness of the organisation and the entire port community in the culture of sustainability.
- Maintain adequate channels of communication with the Port Community, Public Administrations, social and economic agents and society in general, with regard to the port's activities and in relation to quality and the environment.
- Annually publish information on the Port Authority's environmental performance.

Approved by the President of the Santander Port Authority May 2022

18|Page

5. SIGNIFICANT ENVIRONMENTAL ASPECTS AND IMPACTS

Santander Port Authority carries out an annual evaluation of its environmental aspects, in accordance with the internal procedure "Identification and evaluation of environmental aspects", to identify those that have or may have significant impacts on the environment, from a life cycle perspective.

Both aspects of the activity of the Santander Port Authority (direct) and those of third parties on which it can influence (indirect) are considered and assessed with criteria that take into account the dangerousness or nature of the aspect, the frequency with which it occurs and the quantity generated or affected extension, in the case of the real aspects (those associated with the normal activity of the port).

Potential aspects, associated with risk situations with potential environmental impact, are evaluated taking into account probability of occurrence and severity of the consequences, when they materialize.

The following sections include information on the main environmental aspects, both direct and indirect, as well as the main legislative provisions that affect them.

This information is complemented by the list of aspects and the results of the evaluation of aspects that Santander Port Authority carries out annually (section 1.2 PERS).

ATMOSPHERIC EMISSIONS

Environmental aspect	Generating activity	Environmental impact
Emission of dust/particles	Third party operations on the dock	Atmospheric pollution
due to the handling of solid		Potential contamination
bulk		of water and soil

- Law 34/2007, of November 15, on air quality and protection of the atmosphere.
- Royal Decree 102/2011, of January 28, regarding the improvement of air quality, modified by Royal Decree 39/2017, of January 27.
- Royal Decree 100/2011, of January 28, which updates the catalog of potentially polluting activities of the atmosphere and establishes the basic provisions for its application.
- Decree 50/2009, of June 18, which regulates the control of industrial air pollution in the Autonomous Community of Cantabria.
- Environmental regulations of the Port Authority of Santander.

WATER DISCHARGES

Environmental aspect	Generating activity	Environmental impact
Discharge of wastewater to sewage collector	Use of buildings: maritime station, fish market and administrative buildings Use of buildings by third parties	Potential contamination of water and soil
Discharge of wastewater from lighthouses	Use of the lighthouses	
Discharge of rainwater to the port basin	Discharges from roads and platforms /docks in which third parties operate	

Applicable legislation

- Law 22/1988, of July 28, on Coasts.
- Law 41/2010, of December 29, on the protection of the marine environment.
- Royal Decree 1695/2012, of December 21, which approves the National System of Response to marine pollution.
- Royal Decree 817/2015, of September 11, which establishes the criteria for monitoring and evaluating the state of surface waters and environmental quality standards.
- Decree 47/2009, of June 4, which approves the Regulation of Discharges from Land to the Coast of the Autonomous Community of Cantabria.
- Royal Decree-Law 4/2007, of April 13, which modifies the revised text of the Water Law, approved by Royal Legislative Decree 1/2001, of July 20.
- Law of Cantabria 2/2014, of November 26, on Water Supply and Sanitation of the Autonomous Community of Cantabria.
- Decree 18/2009, of March 12, which approves the Regulation of the Public Service of Sanitation and Purification of Residual Waters of Cantabria.

CONSUMPTION OF NATURAL RESOURCES

Environmental aspect	Generating activity	Environmental impact
Water consumption	Water supply to third parties	Depletion of natural
		resources
Fuel consumption	Vehicles and boats	Atmospheric pollution
	Generator sets	Contribution to climate
	Others	change
Paper consumption	Administrative tasks (consumption in	
	offices)	
Toner consumption	Administrative tasks (consumption in	
	offices)	
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- Decision (EU) 2019/61 of the Commission, of December 19, 2018, regarding the sectoral reference document on the best environmental management practices, the sectoral indicators of environmental behavior and the comparative parameters of excellence for the administration sector public in the framework of Regulation (EC) No. 1221/2009
- Order PCI/86/2019, of January 31, which publishes the Agreement of the Council of Ministers of December 7, 2018, which approves the Ecological Public Procurement Plan of the General State Administration, its agencies self-employed and social security management entities (2018-2025).
- Royal Decree 920/2017, of October 23, which regulates the technical inspection of vehicles.

WASTE GENERATION

Environmental aspect	Generating activity	Environmental impact
Construction and	Maintenance and infrastructure works	Potential contamination
demolition waste		of water and soil
RSU Collector	Buildings and workshops	
	Third party buildings and concessions	
	Fish market and fishing port	
MARPOL I	Waste from ships	
General waste	General operations of the port	
Used oils, filters	Fishing port	
Contaminated, plastic		
containers and electric		
material		

- Law 7/2022, of April 8, on waste and contaminated soil for a circular economy.
- Royal Decree 105/2008, of February 1, which regulates the production and management of construction and demolition waste.
- Decree 72/2010, of October 28, which regulates the production and management of construction and demolition waste in the Autonomous Community of Cantabria.
- Royal Decree 679/2006, of June 2, which regulates the management of used industrial oils.
- Royal Decree 106/2008, of February 1, on batteries and accumulators and the environmental management of their waste.
- Royal Decree 110/2015, of February 20, on waste electrical and electronic equipment.
- Law 11/1997, of April 24, on packaging and packaging waste.
- Royal Decree 128/2022, of February 15, on port reception facilities for ship waste.
- Royal Decree 553/2020, of June 2, which regulates the transfer of waste within the territory of the State.
- Royal Decree 646/2020, of July 7, which regulates the disposal of waste by depositing it in a landfill.
- Decree 42/2001, of May 17, which creates and regulates the Registry of Small Producers of Hazardous Waste in the area of the Autonomous Community of Cantabria.
- Municipal ordinance on urban waste management and street cleaning (City Council of Santander).

NOISE GENERATION

Environmental aspect	Generating activity	Environmental impact
Noise	General operations of the port: maritime station	Noise pollution

Applicable legislation

- Law 37/2003, of November 17, on noise.
- Royal Decree 1513/2005, of December 16, which develops Law 37/2003, of November 17, on Noise, in relation to the evaluation and management of environmental noise.
- Royal Decree 1367/2007, of October 19, which develops Law 37/2003, of November 17, on noise, in relation to acoustic zoning, quality objectives and acoustic emissions.
- Royal Decree 212/2002, of February 22, which regulates noise emissions in the environment due to certain machines used outdoors.
- Municipal ordinance for the environmental control of facilities and activities (City Council of Santander)

ACCIDENTAL SPILLS INTO THE SEA

Environmental aspect	Generating activity	Environmental impact
Risk of accidental discharge of waste or hazardous substances into the sea	General port operations: loading and unloading Port services: fuel supply, cleaning service, etc. Activity of authorized companies and concessions	Marine contamination
	Ship accidents	

- MARPOL 73/78 Convention. International convention for the prevention of pollution by ships.
- OPRC Convention. International agreement on cooperation, preparation and fight against pollution by hydrocarbons.
- Royal Decree 1695/2012, of December 21, which approves the National System of Response to marine pollution.
- Royal Decree 804/2014, of September 19, which establishes the legal regime and the safety and pollution prevention standards for recreational vessels carrying up to twelve passengers.
- Order FOM/1793/2014, of September 22, which approves the National Maritime Plan for response to pollution of the marine environment.
- Law 26/2007, of October 23, on environmental responsibility.
- Royal Decree 2090/2008, of December 22, which approves the Regulation for the partial development of Law 26/2007, of October 23, on Environmental Responsibility.

ACCIDENTAL SPILLS TO LAND / GROUNDWATER

Environmental aspect	Generating activity	Environmental impact
Risk of accidental discharge of waste or hazardous substances to the ground/groundwater	General port operations: loading and unloading Port services: fuel supply, cleaning service, etc. Breakdowns: tank/pipe leaks, maintenance, vehicles, etc. Activity of authorized companies and concessions	Soil and/or groundwater contamination
	Applicable legislation	

- Law 7/2022, of April 8, on waste and contaminated soil for a circular economy.
- Royal Decree 9/2005, of January 14, which establishes the list of potentially polluting activities of the soil and the criteria and standards for the declaration of contaminated soil.
- Royal Decree 145/1989, of January 20, approving the National Regulations for the Admission, Handling and Storage of Dangerous Goods in ports.
- Royal Decree 393/2007, of March 23, approving the Basic Self-Protection Standard for centers, establishments and dependencies dedicated to activities that may give rise to emergency situations.
- Royal Decree 840/2015, of September 21, which approves control measures for the risks inherent in serious accidents involving dangerous substances.
- Law 26/2007, of October 23, on environmental responsibility.
- Royal Decree 2090/2008, of December 22, which approves the Regulation for the partial development of Law 26/2007, of October 23, on Environmental Responsibility.

6. MANAGEMENT OF ENVIRONMENTAL ASPECTS

Santander Port Authority has spent years developing management tools that have allowed it to achieve a high degree of protection of the environment in balance with socioeconomic needs.

Next, the environmental performance of the Port of Santander is analyzed during the year 2021 and comparatively with previous years.

AIR QUALITY

Santander Port Authority does not carry out any activity that could potentially pollute the atmosphere. Its main direct emissions are associated with the combustion of vehicles and boats engines, the works it carries out, as well as the operation of generator sets and other machinery.

Other activities carried out within the Port Community are more relevant in terms of emissions into the atmosphere, such as operations related to the handling of solid bulk. For its monitoring and management, there is an air quality control network in the port area.

Santander Port Authority has an air quality control station that measures PM_{10} fraction particles and gases SO_2 , CO and NO, NO_2 , NO_x . In addition, two specialized terminals have fixed control stations that measure PM_{10} fraction particles.

The following table shows the results of the air quality control stations located in the Port, which show that in 2021 the legally established limits have not been exceeded:

ATMOS	PHERIC POLLUTION	Legal limit RD 102/2011	2019	2020	2021
	No. of health protection exceedances (1h average > 350 μ g/m³)	24	0	0	15
SO ₂	No. of health protection exceedances (24-hour average >125 $\mu g/m^3$)	3	0	0	3
NO ₂	No. of exceedances of the hourly limit for health protection (1 h >200 µg/m³)	18	2	0	0
	Annual mean of health protection (μg/m³)	40	18.88	9.98	29.11
со	No. of daily health protection exceedances (10 mg/m³)	Eighth-hour average	0	0	0
PM10	No. of daily health protection exceedances (24-hour average > $50 \mu g/m^3$)	35	41	22	27
PIVI10	Annual average of average daily values of health protection ($\mu g/m^3$)	40	44.18	32.5	30.51

In order to control emissions into the atmosphere, Santander Port Authority also carries out daily monitoring of port activities, establishes environmental criteria in the organization and assignment of berths. In addition, has reorganized the activity of the port to remove the emission sources from the most sensitive, promotes improvements in the equipment of operators and has Environmental Standards, applicable to all operators, which allow environmental stops - in certain circumstances - in bulk loading and unloading operations.

The following table shows the number and duration of the operational stops made in the handling of goods.

	2019	2020	2021
Number of operational stops	24	17	23
Number of boats	18	12	14
Total accumulated time (hours)	40h 23min	30 h 02 min	60 h 15 min

In addition, the calculation of the carbon footprint has been carried out based on the methodology developed by the Cedex "Methodological Guide for the calculation of the carbon footprint in ports" for Puertos del Estado and with the support of the tool developed by the Port of Vigo.

It has been considered years 2020 and 2021, scopes 1 and 2. It is observed that in 2021 greenhouse gas emissions have been reduced compared to 2020.

Coope	Emissions (tCO2)		
Scope	2020	2021	
Scope 1	66,521	62,764	
Scope 2	0.00	0.00	

Scope 1 is related to direct emissions produced by sources or processes that are owned or controlled by the Santander Port Authority, such as the consumption of fossil fuels, while scope 2 includes indirect emissions produced in the generation of electricity acquired and consumed. In this sense, it should be noted that energy company contracted by Santander Port Authority supplies energy from renewable sources with a guarantee of origin certificate; therefore, its emission factor is 0 kgCO2/kWh.

NOISE

Most important sources of noise emissions are ferry and cruise traffic at the Maritime Station, road traffic, industrial activities, handling of goods and construction sites, which have given rise to a single noise impact complaint in 2021.

Due to the proximity between the port and the city of Santander, the control of acoustic effects produced by port activities is important to achieve the well-being of both citizens and the entire port community. For this reason, a continuous recording campaign of 2021 sound levels has been carried out.

During the months of May to December, four acoustic sensors were installed at Maliaño to continuously record noise levels, in order to know the impact of works and the arrival of ferries and cruise ships at the Maritime Station.

ENVIRONMENTAL REPORT 2021. SANTANDER PORT AUTHORITY



Punto de control	Ubicación	
1	Estación marítima	
2	Comandancia marítima	
3	Frente a tinglados	
4	Junto acceso a zona franca	

In these campaigns it is observed that the most sensitive period is at night, when activity and traffic of the city is less, and the noise of the Port can be perceived more clearly by the population closest to the Maritime Station. The rest of the port activities, further away from the populated areas, hardly produce noise effects on citizens.

To minimize the acoustic impact, different measures are applied, such as periodic measurement campaigns, the installation of acoustic screens, surveillance of port operations by personnel from the Port Authority, improvement of road surfaces and speed limits on them, as well as the reorganization of activities and internal traffic to move noise sources away from urban areas.

WATER QUALITY AND DISCHARGES

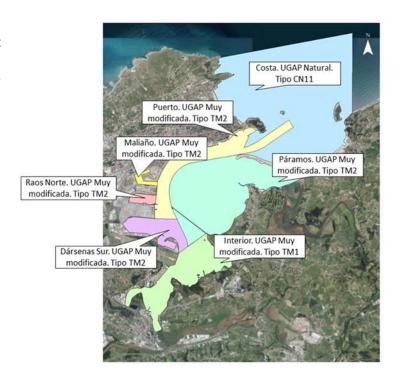
The main water discharges that occur in the Port of Santander are wastewater from buildings belonging to the Port Authority - discharged into the sanitation network of the Bay or municipal collector, wastewater from activities carried out in the port area (concessions / authorizations), rainwater from the port area - discharged from port collectors to port docks - and wastewater from relief from the bay sanitation interceptor.

In addition, discharges from works or accidental discharges originating from loading and unloading or other non-regulatory discharges from ships may occasionally occur.

Quality of coastal waters in port areas ROM 5.1-13

During 2021, the implementation of ROM 5.1-13 was reviewed, through the signing of the research contract with IH Cantabria for the management of coastal waters in the service area of the Port of Santander. The result of this implementation is as follows:

- Delimitation and typification of port aquatic management units (UGAP): 7 UGAP are delimited and typified; 6 heavily modified transition UGAPSs and 1 natural coastal UGAP.



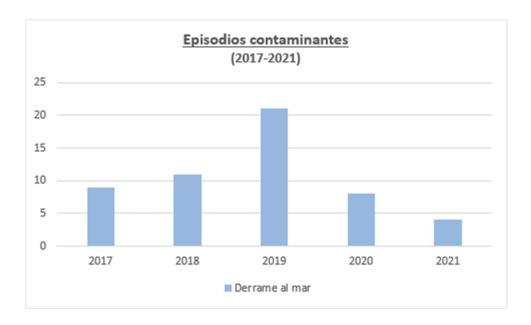
- Environmental risk assessment and management: Point (89) and diffuse (4) polluting emissions are identified and characterized and their environmental risk is assessed. Specific emissions come from company drains, rainwater discharges and relief from the sanitation network, 15% are external (located outside the service area of the port). Diffuse emissions come from solid bulk loading and unloading operations.



- Evaluation of the environmental quality of the port waters of the natural and heavily modified UGAPs (period 2016-2021): both the natural coastal UGAPs and the modified transitional UGAPs present an ecological and chemical status classified between good and very good.

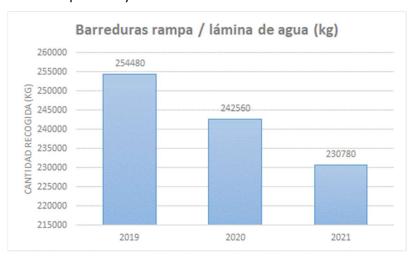
- Management of polluting episodes: the analysis of the register of polluting episodes is carried out, since 2010, according to magnitude, frequency and dangerousness of the episodes and the vulnerability of the affected area.

In the last five years there have been a total of 53 pollution episodes, distributed as shown in the graph.



Among the control measures implemented, apart from the analytical controls of discharges, the Internal Maritime Plan - which has not been necessary to activate in the 2020-2021 period, the Plan for the reception and handling of waste generated by ships and waste of loading and the surveillance of operations on the dock - by the Port Police - the provision of decanters on the dock for solid bulk, for the treatment of runoff water, stands out.

In addition, to improve the quality of port waters, in 2021 the Santander Port cleaning service vessel removed a total of 230.78 tons of waste from the water surface and ramps in the Service Area, a 5% less than the previous year.



WASTE

Santander Port Authority generates and manages waste from its own activity, from buildings (where separate collection of paper and cardboard, packaging, batteries, toner and computer waste), workshops (where hazardous and other waste is generated from the activities of maintenance and upkeep of infrastructures, maritime signals, machinery and civil works), works (construction and demolition waste) and others generated in a timely manner (scrap, electrical material, lamps, etc.).

In addition, Santander Port Authority carries out comprehensive management of waste in the port's service area, providing cleaning services in common areas of land and water, docks and esplanades, as well as taking charge of receiving waste generated by vessels, official vessels, vessels assigned to port services, sports or recreational vessels and fishing vessels.

During 2021, Santander Port Authority managed a total amount of 1,302 tons of waste, of which 364.32 tons (28%) were destined for recovery and 937.75 tons (72%) for landfill. The waste generated directly by the Santander Port Authority, excluding works, has been 56.42 Tn.

If we exclude the collection of inert materials and sweepings, mostly destined for landfill, 99% of the remaining waste is collected separately and destined for recovery.

In the following graphs we can see their evolution in recent years, where they are classified as dangerous, non-dangerous and inert:







In addition, Port Authority of Santander facilitates the collection of MARPOL Annex I waste (hydrocarbon waste discharges - which correspond to water contaminated with crude oil, water contaminated by petroleum products and oily mixtures from bilges or purification of fuels and oils) and Annex V (includes the different types of waste from ships).

In 2021, more of both types of waste were collected than in 2020.

Marpol I	2019	2020	2021	
Vessels using the Service	29.86%	28.03%	30.56%	
Average delivery per scale (m³)	11.84	8.67	12.22	

Marpol V	2019	2020	2021
Vessels using the Service	51.43%	47.31%	52.72%
Average delivery per scale (m³)	2.46	1.72	2.35

Among the control measures established by Port Authority, in addition to the comprehensive waste management service, operators are urged to introduce improvements in operations and equipment, which result in a reduction in the generation of waste at source, and discounts are the rate of activity for best environmental practices. In addition, there is a Clean Fishing Point where hazardous waste from the fishing fleet is collected, to facilitate its proper management.

Evolution is shown in the following table:

Waste (kg)	2019	2020	2021
Absorbents and impregnated solids	640	220	216
Motor oil	14,630	9,025	9,168
Aerosol sprays	220	-	37
Contaminated metal containers	400	2020	1,359
Contaminated plastic containers	800	400	1,070
Used oil filters	1,000	400	901
Fluorescent	-	360	236
Antifreeze liquid	60	-	78
Electric material	1,000	100	1,275
Toner (buildings and workshops)	25	-	15
Total (kg)	18,775	12,525	14,355

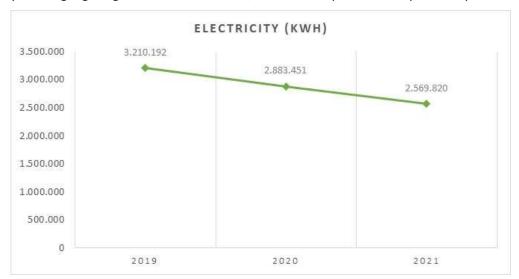
ECO-EFFICIENCY

Port authority of Santander periodically monitors its consumption of natural resources: electricity, water and fuel, as well as paper and toner consumption.

Electrical energy is consumed for night lighting, lighting and air conditioning in buildings or for other equipment such as cold rooms, machinery and electric vehicles, computer equipment, etc.

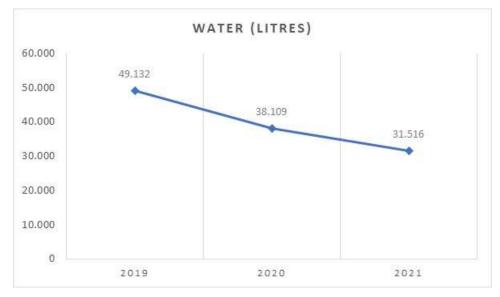


The following graph shows the evolution of electricity consumption in the last three years, highlighting the reduction of 11%, in 2021, compared to the previous year.





During 2021, the consumption of third parties has increased by 29%, while the consumption of water by Port Authority has been reduced, in 2021, by 17% compared to 2020, thanks to the existence of rainwater cisterns, which have allowed a saving of 9,583 m³ of water in street cleaning.

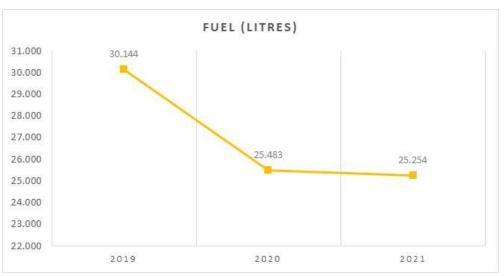


The efficiency of the water distribution network, related to losses due to leaks, has improved considerably in 2021, standing at 93.17% compared to 72.22% in 2020.



Fuel consumption occurs mainly in the automotive industry (vehicle fleet and machinery), followed by consumption in air conditioning of buildings, use of generator sets and motor boats. In 2021, the boiler from the maintenance warehouses was decommissioned due to the transfer of the area to a new facility.

In total terms, after several years of decline, fuel consumption in 2021 is practically the same as the previous year (-1%).



Finally, note that in 2021 paper consumption has increased by 8.5% compared to 2020, the year in which data began to be collected.

The Port Authority takes measures to ensure efficiency in the consumption of resources such as contracting energy from 100% renewable sources, carrying out an energy performance diagnosis, the study of the implementation of renewable energies in the port, remote control of exterior lighting in fields and perimeters, LED lighting in lighting towers, archive and Cabo Mayor lighthouse, as well as the acquisition of electric vehicles (10 vehicles have been replaced in 2021).

SOIL QUALITY AND GROUNDWATER

In the Port of Santander there are plots where activities that potentially pollute the soil are practiced or have been practiced. Specifically, three areas have been identified: Maliaño Pier – Varadero, Raos North Breakwater and Raos South Breakwater.

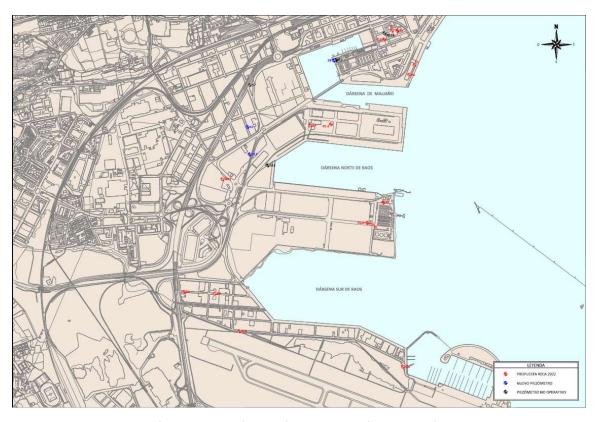
Since 2009, the date on which the environmental characterization of the potentially contaminated soils and groundwater in the Port of Santander was carried out, quality controls of the groundwater of the piezometric network installed in the Port have been periodically carried out, as well as updates to the Environmental Risk Assessment, in order to verify and evaluate the evolution of the control parameters.

Additionally, soil characterizations are carried out in concessions when there is a change in land use, being promoter both the Port Authority and the concessionaires.

In October 2021, a new control of the groundwater of the Piezometric Network of the Port of Santander was carried out. A general attenuation or stabilization of the concentrations of the compounds analyzed in the groundwater is observed with respect to previous campaigns. In no case is there a risk to the human health of the facility workers.

In 2021, the characterization of soil and groundwater and the quantitative risk analysis of the work area "Demolition of land buildings in Antonio López street in Santander" will also be carried out, obtaining an admissible risk for systemic and carcinogenic risk for workers.

Lastly, during 2021 work has been done on the preparation of a Soil Management Plan based on the characterizations carried out and the activities granted in concession, in order to have a system for evaluating the magnitude of possible environmental problems in terms of soil and groundwater associated with each site, whose development is expected from 2022.



Proposal of piezometers for the future RECA of the Port of Santander

In addition to what has already been described, with the aim of preventing the contamination of soil and water, Santander Port Authority has other measures such as the proper management of MARPOL waste, technical instructions for operations included in environmental regulations, internal maritime plan, guidelines for cleaning the water surface and port service area, as well as surveillance and control by the Port Police Service.

7. LEGAL REQUIREMENTS

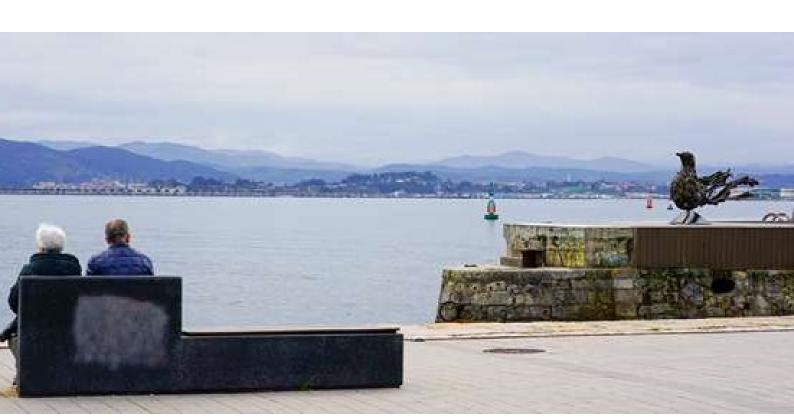
Santander Port Authority identifies and disseminates to affected personnel the legal requirements - and other requirements that the Santander Port Authority subscribes to - applicable to its environmental aspects, in accordance with the internal procedure "Identification of legal requirements and others".

The applicable legal provisions, both at European, state, regional and municipal levels, are identified with the help of technical assistance, as well as through periodic consultation of official bulletins and/or web pages, in addition to the information and guidelines received from Puertos del Estado.

These provisions are communicated to those responsible for ensuring compliance and are transferred to a database, which is kept permanently updated, created to facilitate the identification and evaluation of the different requirements. With help of this database, an evaluation of compliance with the requirements is carried out annually, reviewing their status with each of the assigned managers; In addition, this aspect is reviewed both in internal and external audits.

In the section "Significant environmental aspects and impacts" of this report, reference is made to the main legal requirements applicable to each of these environmental aspects.

The records generated in the implementation of PERS include a declaration of compliance with the applicable legal requirements (section 1.4 PERS).

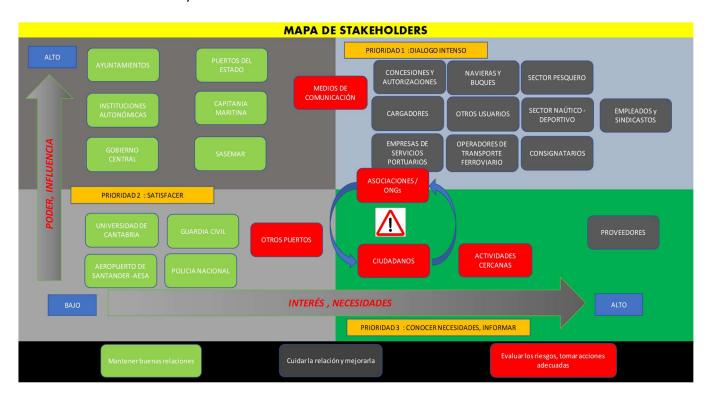


8. STAKEHOLDERS' NEEDS AND EXPECTATIONS

Santander Port Authority is aware of the impact that its activities may have on its environment, affecting people, companies and institutions, which is why it integrates corporate social responsibility into its management.

In this sense, the internal procedure "Analysis of the context of the organization" is available, which describes the way in which Santander Port Authority establishes its strategy and objectives based on the most relevant internal and external issues, which includes environmental issues and needs and expectations of its stakeholders.

Santander Port Authority has prepared a map of stakeholders in which each of them is identified and classified according to their power or influence and their interests and needs; The priority of each interest group is established according to the results of the context analysis that is carried out annually.



Santander Port Authority establishes, for each interest group, their needs and expectations, as well as the sources of information available to them, and links them with the context analysis and the operational objectives, so as to ensure that these needs and expectations are met. taken into account in the management and operational activity of the port.

Among the most relevant needs and expectations of the stakeholders are the following.

DIMENSION	STAKEHORDER	NEEDS / EXPECTATIONS / REQUIREMENTS
	CONCESSIONS AND AUTHORIZATIONS	New ground available Improvement of infrastructures, adequate valuation of the land.
	CONSIGNEES	Fluency in communication and management with Port Authority
	FISHING SECTOR	Improvement of operations and management of related processes
	SPORTS NAUTICAL SECTOR	Growth of activity related to nautical sports in the Port of Santander
	PORT SERVICES COMPANIES	
CUSTOMERS / PORT COMMUNITY	SHIPPING AND VESSELS	Troubleshoot boat intrusion LNG supply station, availability of ramps without load limitation, availability of shelter, adequate maritime accessibility, availability of a dock.
	SASEMAR, CIVIL GUARD, NA- TIONAL POLICE, CUSTOMS	Improved cooperation between different institutions with competences in security and protection
	SUPPLIERS AND COMMERCIAL SERVICES	Transparency and agility in contracting works, services and supplies
	RAIL TRANSPORT OPERATORS	Improvement of the conditions and efficiency of rail transport. Improvement of the management of Muriedas terminal
	SHIPPERS AND END CUSTOMERS	Improvement of the efficiency of port services and reduction of the cost of passing merchandise. Regular, reliable and economic lines for the import-export activities of the hinterland. Specialized terminals.
	MANAGEMENT/PRESI- DENCE/BOARD	Cost effectiveness Improvement of corporate image
PEOPLE	EMPLOYEES	Training Internal communication equality policies Internal promotion Recruitment COVID measures
		Environmental pollution control
	CITIZENS	Generation of port-city integration spaces
		Cultural, sporting, social activities
		Generation of wealth and employment
SOCIETY	ASSOCIATIONS AND NGOs	Port expansion opposition, cooperation in initiatives dedicated to improving the environment, training, cultural, social.
Joceth	OTHER PORTS	Cooperation in the field of institutional relations, sustainability, training, generation of knowledge.
	MEDIA	Maintenance of fluid communication channels

ENVIRONMENTAL REPORT 2021. SANTANDER PORT AUTHORITY

DIMENSION	STAKEHORDER	NEEDS / EXPECTATIONS / REQUIREMENTS
	CENTRAL GOVERNMENT	Cooperation in the field of European financing, environmental assessment of plans and projects, auditing and control, development of rail freight networks, regulations, etc.
	AUTONOMOUS INSTITUTIONS	Cooperation in the field of land transport of goods, fishing, logistics, environmental assessment, tourism
ADMINISTRATION / PUBLIC INSTITUTIONS	TOWN HALLS	Recovery of land for urban use, cooperation in the field of maintenance of port assets for urban use, cooperation in the development of urban planning and management of heritage land. Generation of activities with a positive impact on the city such as nautical sports and tourism.
	STATE PORTS	Cooperation in the field of planning of the Port Authority, environmental assessment, training, promotion, control, financing and execution of investments, regulation of port services.
	SEA CAPTAINCY	Institutional cooperation in the management of maritime activity in the Port of Santander.
	SANTANDER/AESA AIRPORT	Compliance with aeronautical easements
	UNIVERSITY OF CANTABRIA	Cooperation in the field of training and research on port activity. Internship agreements.

ENVIRONMENTAL REPORT 2021. SANTANDER PORT AUTHORITY

In order to respond to these demands, Santander Port Authority has developed the following actions in 2021, in different progress situations (those that, as of December 2021, had an execution percentage of more than 50%) are indicated:

- ⇒ Improving the competitiveness of car traffic
- ⇒ Development of new semi-trailer parking and border control of the ferry terminal
- ⇒ Implement an LNG supply infrastructure
- ⇒ Waterfront Development
- ⇒ Determination of the value of the land and sheet of water in the service area of the port
- ⇒ Infrastructure preventive maintenance plan
- ⇒ Improvement of port protection facilities
- ⇒ Follow-up of the work program for new investments in specialized terminals
- ⇒ Resilience plan
- ⇒ Improvement of the corporate image through the cultural presence of the port in the city
- ⇒ Continuous improvement in protection and security
- ⇒ Continuous improvement of environmental aspects and processes and port management to maintain the certification of the environmental management system (ISO 14001)

In addition, since 2011 the Santander Port Authority has had different institutional collaboration agreements, among which the following stand out, because they are more recent:

- ⇒ Agreement with Santander City Council dated March 2019, for the execution of demolition works on buildings on Paseo Alberto Pico and Calle Marqués de la Ensenada and refurbishment as a public space.
- ⇒ Agreement, of November 2020, with the Regional Society of Education, Culture and Sports, SL of the Government of Cantabria to carry out the urbanization works around ENAIRE.
- ⇒ Start of processing, during 2021, of two collaboration agreements with the Bareyo and Santoña City Councils to facilitate public access to the Cabo de Ajo and El Caballo lighthouses.

9. OBJECTIVES, ACTIONS AND PROGRAMS

Port Authority of Santander annually establishes its sustainability objectives and performs quarterly monitoring of their degree of progress.

ACTIONS UNDERTAKEN IN 2021

In 2021, progress has been made in achieving the following:

⇒ Environmental management: initial steps have been taken to obtain the PERS certification in 2022, as well as the initial environmental analysis, with the aim of obtaining the EMAS registration in 2022.

OPERATIONAL OBJECTIVE	INDICATOR		STATUS 2020	2021 GOAL
OB_1: IMPROVE THE ENVIRONMENTAL	DEGREE OF DEVELOPMENT OF	PERS (SPO)	DOCUMENTATION PROCESS	PLANNED TO IMPLEMENT
	CROSS THE SYSTEMS	ISO 14001 (GLOBAL SCOPE)	YES	CERTIFICATE RENEWAL
ENVIRONMENTAL MANAGEMENT SYSTEMS	IMPLEMENTED)	EMAS	NΩ	DOCUMENTATION PREPARATION

- ⇒ Energy efficiency: Study based on the implementation of energy generation alternatives using renewable sources to supply the Port Authority's facilities, mainly on building roofs (photovoltaic) and fields (wind). In addition, light source of the lantern of the Cabo Mayor lighthouse has been replaced by LED and there is a supply contract with the obligation that the energy comes from renewable sources.
- ⇒ Noise management: Considerations of noise study of ferries and cruise ships, carried out in 2020, have been taken into account for the conditions of the future Maritime Station. In addition, four noise sensors were installed to control noise emissions during the works to be carried out on the dock next to the resident areas during 2021-2022.
- ⇒ Surveillance of the quality of port waters: Within the framework of the research contract for assistance in the management of coastal waters in service area, environmental risk management has been carried out and systematics have been established for surveillance of the quality of port waters and for the management of polluting episodes, with new tools being developed to facilitate their management.
- ⇒ Surveillance of soil quality: Within the framework of the assignment for the Management Plan for contaminated soil, the industrial activities carried out by the concessions that operate in the port have been identified and work is being done to control possible sources of contamination of soil and groundwater, as well as in the control of its evolution. In addition, a soil study has been carried out on the port land occupied by the maintenance workshops, which have been moved in anticipation of the change in use.
- ⇒ Action in emergencies due to marine pollution: In 2021, the Port Authority has signed a service contract with SASEMAR for the coordination of prevention tasks and actions in emergency situations, rescue and fight against pollution. Within the framework of this contract, an emergency drill has been carried out.
- ⇒ Carbon footprint: Procedures have been initiated to calculate the carbon footprint of the Port Authority, with scope 1 and 2, of 2021.

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