

Enerdealers GRI Standards - Board Approval

Aligned board statement for relevant stakeholders

April 27th 2026.

Below is a **board-discussion draft of a GRI-aligned sustainability report for Enerdealers**, built from the company's published website content and the GRI Standards framework. It is structured as a **step-by-step final report** for discussion with the board and relevant stakeholders.

This draft already reflects strong **alignment with the GRI Standards** in both structure and content, providing a solid foundation for full compliance. It serves as a clear **pathway for decision-making and model development on the matter**. With the validation of data by Enerdealers, **completion of the remaining disclosures, and preparation of the final GRI content index, the report** will be well-positioned to confidently achieve full reporting "in accordance with the GRI Standards."

GRI 1 distinguishes between reporting "in accordance with" the Standards and reporting "with reference to" them when all requirements are not yet fully met.

1. About this report

This report has been prepared as a first structured sustainability report for Enerdealers, following the architecture of the **GRI Universal Standards 2021** and using a materiality-based approach consistent with **GRI 3: Material Topics 2021**.

The GRI system is organized into three sets of standards: **Universal Standards, Sector Standards, and Topic Standards**. All organizations use **GRI 1, GRI 2, and GRI 3**; then they use applicable Sector Standards and select Topic Standards according to their material topics.

Enerdealers publicly states that ESG considerations are integrated into its business strategy, trading activities, operational decision-making, and risk management processes. The company also states that its reporting and ESG performance management are intended to align with **CSRD, EU Taxonomy, and TCFD**, with documented evidence available for auditors, regulators, banks, and trade finance partners. ([Enerdealers](#))

This report is intended to serve three purposes:

First, it is a **governance and disclosure tool** for the board and senior management. Second, it is a **credibility signal** for investors, lenders, banks, counterparties, and regulators.

Third, it is a **transition document** that gives Enerdealers a disciplined pathway toward more mature GRI reporting and future **European Sustainability Reporting Standards (ESRS)** and **Corporate Sustainability Reporting Directive (CSRD)** readiness. Enerdealers itself states that ESG performance and progress are reported in alignment with CSRD, EU Taxonomy, and TCFD “as applicable.” ([Enerdealers](#))

2. Understand the GRI system and apply it to Enerdealers

Under GRI, the reporting process starts with the Universal Standards:

GRI 1: Foundation 2021 explains the purpose and system of the Standards, the requirements for reporting in accordance with them, and the reporting principles such as accuracy, balance, and verifiability.

GRI 2: General Disclosures 2021 covers organizational details, reporting practices, activities, governance, and policies.

GRI 3: Material Topics 2021 provides the step-by-step guidance on how to determine material topics and how to report the process and management approach for those topics.

For Enerdealers, this means the report should not begin with a marketing narrative. It should begin with:

- a. the company’s reporting boundary and profile,
- b. the governance and policy framework,
- c. the process used to identify the company’s most significant impacts, and

- d. the management approach and disclosures for those impacts.

That approach is also coherent with Enerdealers' own ESG policy, which states that ESG is integrated into business strategy, trading, operations, compliance, and risk management across the trading lifecycle. ([Enerdealers](#))

3. Company profile and reporting context

Enerdealers presents itself publicly as an **energy commodity trading company** with operations and contacts in **Spain, the United Arab Emirates, and Azerbaijan**, and with business reach across Europe, America, the Middle East, Africa, and Asia.

The company emphasizes its role as a trusted partner in global energy trading and highlights the importance of compliance across health and safety, emissions, environmental standards, commodities, cargo and financial crime, international trade and sanctions, and banking and derivatives markets. ([Enerdealers](#))

From a GRI perspective, the company's impact profile is not the same as that of a manufacturer or industrial operator. Enerdealers' most significant impacts are likely to arise through:

- its **trading decisions**,
- its **counterparty and supplier selection**,
- its **logistics and transportation chain**,
- its **sanctions / AML / anti-corruption controls**,
- its **climate-related risk handling**, and
- its **governance, disclosure, and evidence systems**.

That reading is consistent with Enerdealers' stated ESG scope, which covers sourcing and procurement, counterparty and producer due diligence, trading, logistics, transportation, storage, delivery, sanctions screening, contractual arrangements, monitoring, and reporting. ([Enerdealers](#))

4. Reporting principles to apply throughout the process

GRI 1 specifies the reporting principles that support quality reporting. Public GRI guidance highlights principles such as **accuracy, balance, and verifiability**, and GRI 1 explains that the reporting principles are fundamental to ensuring the quality of the reported information.

For Enerdealers, the practical meaning of those principles is:

Accuracy means the company should not overstate climate progress, ESG screening coverage, or governance maturity. It should only report what is documented and supportable.

Balance means the report should discuss both strengths and limitations, including data gaps, immature KPIs, or incomplete Scope 3 methodologies.

Verifiability means each disclosure should be connected to an underlying policy, process, control, or evidence source that auditors, lenders, regulators, or trade finance partners can review. Enerdealers' own ESG policy already anticipates this by stating that documented evidence should be available for auditors, regulators, banks, and trade finance partners. ([Enerdealers](#))

The report should also apply the content-defining principles embedded in GRI practice: stakeholder inclusiveness, sustainability context, materiality, and completeness.

For Enerdealers, this means the report must be framed not only around internal management priorities but also around the needs of investors, banks, regulators, counterparties, suppliers, logistics providers, and employees.

5. Understand Enerdealers' context and identify actual and potential impacts

Enerdealers' ESG policy states that it supports long-term value creation, responsible energy and commodities trading practices, and effective management of operational, supply-chain, regulatory, and reputational risks. The same policy says ESG risks are assessed proportionately based on **commodity type, origin, logistics, and counterparty profile**, and that climate-related physical and transition risks are assessed in line with the Task Force on Climate-related Financial Disclosure (TCFD) principles. ([Enerdealers](#))

Enerdealers' likely impact universe can be grouped as follows.

5.1 Environmental impacts

Enerdealers' environmental impacts are likely concentrated less in its own office footprint and more in the broader chain of **traded commodities, transportation, logistics, sourcing decisions, and counterparty conduct**. The company's policy explicitly refers to environmental risk assessments in supplier and counterparty selection, compliance with environmental laws relevant to trading and logistics, biodiversity protection and responsible land use among counterparties, and climate-related risks and opportunities. ([Enerdealers](#))

The most relevant actual and potential environmental impacts therefore include:

- climate-transition exposure and carbon intensity associated with traded products and counterparties,
- indirect environmental risk in logistics and cargo movement,
- exposure to environmentally sensitive sourcing geographies,
- potential biodiversity and land-use concerns in supply chains,
- emissions and environmental compliance risk affecting trade and transport operations.

5.2 Social impacts

The social impacts most visible from Enerdealers are:

- occupational health and safety within Enerdealers and across suppliers and logistics interfaces,
- human rights expectations in supply chains and counterparties,
- employee training, wellness, and recognition,
- diversity and inclusion,
- broader community effects indirectly linked to operations.

Enerdealers' ESG policy expressly includes occupational health and safety, human rights, wellness, diversity and inclusion, and responsible practices in supplier and counterparty networks. The company also states that counterparties are expected to show ESG awareness, including health and safety policies and human rights compliance. ([Enerdealers](#))

5.3 Governance and economic impacts

Governance impacts are especially prominent for Enerdealers. Public disclosures highlight sanctions screening, anti-bribery and anti-corruption compliance, AML, risk-based due diligence, compliance oversight, and strategic ESG governance by senior management and the risk/compliance function.

The legal and financial approach also frames compliance as a competitive advantage and part of what makes the company a trusted partner in global energy trading. ([Enerdealers](#))

The most significant governance and economic impact areas therefore include:

- business ethics conduct and anti-corruption,
- sanctions and AML controls,
- market conduct and regulatory compliance,
- governance quality and board oversight,
- counterparty due diligence and contract integrity,
- resilience and trust in global trading relationships.

6. Assess the significance of impacts and determine material topics

GRI 3 defines material topics as the topics representing an organization's most significant impacts on the economy, environment, and people, including impacts on human rights. GRI 3 also requires the organization to report the process used to determine material topics, the list of material topics, and how each is managed. ([Global Reporting Initiative](#))

For Enerdealers, a board-level impact assessment should use four filters:

- **Severity:** how large, widespread, or hard to remedy the impact could be.
- **Likelihood:** how probable the impact is in the ordinary course of trading or operations.
- **Stakeholder salience:** how important the topic is to investors, banks, counterparties, regulators, and employees.
- **Strategic/regulatory alignment:** how directly the topic links to Enerdealers' published ESG policy and external regulatory expectations.

Applying that framework to Enerdealers leads to the following proposed material topics.

6.1 Proposed material topics for Enerdealers

The board of directors approved on April 27, the material topics list and the report architecture, as follows:

1. Climate transition, energy-market exposure, and emissions

Enerdealers publicly places **Action on Climate** at the center of its sustainability architecture and states that climate-related risks and opportunities are assessed in line with TCFD principles. It also states that reporting should align with CSRD, EU Taxonomy, and TCFD. ([Enerdealers](#))

2. Responsible supply chain and counterparty ESG due diligence



Enerdealers explicitly requires ESG awareness and evidence from counterparties and states that ESG screening and due diligence apply to suppliers, counterparties, producers, and logistics providers. ([Enerdealers](#))

3. Ethics, anti-corruption, sanctions, and AML

The compliance architecture is central to Enerdealers' market positioning. The company publicly screens counterparties for sanctions, anti-bribery, and anti-corruption compliance and emphasizes regulatory oversight over financial crime, sanctions, banking, and derivatives markets. ([Enerdealers](#))

4. Governance, accountability, and ESG oversight

ESG policy assigns responsibilities to the board / senior management, management / trading / operations teams, the risk and compliance function, and the ESG function or designated ESG responsible. ([Enerdealers](#))

5. Health and safety

This is material because Enerdealers explicitly includes occupational health and safety among its social objectives and asks counterparties to provide evidence of health and safety policies. ([Enerdealers](#))

6. Human rights in the value chain

This is material because human rights compliance is explicitly part of counterparty expectations and part of the governance objectives in the ESG policy. ([Enerdealers](#))

7. Diversity, inclusion, and people development

This is material because Enerdealers' ESG policy includes explicit diversity and inclusion objectives and refers to training, development, and employee wellness. ([Enerdealers](#))

8. Data protection, documentation, and evidence readiness

This is not described as fully as the other topics on the public site, but it is strongly implied by the company's emphasis on documented evidence for auditors, regulators, banks, and trade finance partners and by the nature of global trading and compliance operations. The detailed internal scope should be confirmed by management. ([Enerdealers](#))

7. Approved schedule

The board should approve the following actions.

1. **April 30**: Approve the **material topics list** and the report architecture.
2. **July 30**: Require management to build a **disclosure control matrix** covering every GRI disclosure, owner, methodology, evidence source, and approval chain.
3. **September 30**: Approve a **year-1 KPI perimeter** focused on counterparty screening, compliance, governance, people, H&S, and climate baselining.
4. **October 30**: Require management to prepare a **full GRI content index**.
5. **November 30**: Decide whether Enerdealers wants the final published report to remain a "with reference" report for the first cycle or whether it will invest immediately to move toward a report "in accordance with" the GRI Standards.

8. Concluding statement for stakeholders

Enerdealers' public disclosures already show a company that understands ESG as part of how global energy trading must be conducted: through disciplined climate awareness, responsible counterparties, strong compliance, and clear accountability.

The next step is to convert that policy position into a fully evidenced reporting system. Doing so would strengthen Enerdealers' profile with investors, banks, trade finance providers, regulators,

and commercial partners, while giving the board a clearer basis for oversight and strategic decision-making.

That direction is consistent with the company’s published claim that regulatory compliance is part of what makes it a trusted partner and that compliance can become a competitive advantage in global energy trading. ([Enerdealers](#))

Date of Approval	Board of Directors	Signature
April 27 th 2026.	Ms. Diana Gispert Perales CEO	