

NON-FINANCIAL STATEMENT

Ebro

2022

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1. ABOUT THIS REPORT

This report (the “**Report**”) contains the Non-Financial Statement of Ebro Foods, S.A. (the “**Company**”) and is part of the Management Report in the Consolidated Annual Accounts of the Company, as parent of the Ebro multinational group (the “**Ebro Group**” or the “**Group**”).

Reporting Period

2022

Reporting Framework

In this statement we report on the social, environmental and/or economic aspects that are important for the Ebro Group. The report has been prepared, in all material aspects, in accordance with the stipulations of prevailing commercial law and following the criteria of the selected GRI standards, as well as other criteria described according to the relevant provisions in the “Index of contents required by Act 11/2018 of 28 December on non-financial information and diversity”.

Scope and Coverage of the Report

The report presents on a consolidated level the non-financial indicators of all the companies operating the core businesses of the Ebro Group and their respective industrial sites (see Annex 1).

The energy consumption of five of the ten offices leased by the Ebro Group are also excluded, as we do not have consistent quantitative data and because their emissions correspond to Scope 3. Those offices are leased by Ebro Foods, S.A. in Spain (three offices in Madrid, Granada and Barcelona), Riceland in Hungary and Euryza in Germany (commercial office).

Changes in the reporting perimeter

During 2022, the Group completed two corporate investment and divestment operations:

1. On 25 February 2022, through the US subsidiary Riviana Foods, the Group reached a binding agreement to purchase the assets of InHarvest, Inc., a US company with a major presence in the industrial business (B2B), Food Service and Private Label for premium specialties of rice, quinoa and grains in the United States.
The operation was completed on 1 April 2022 for a sum of USD 48.75 million and the company has been integrated within the perimeter of Riviana Foods USA.
2. In June 2022, Ebro sold the French company Roland Monterrat, selling sandwiches and fresh ready-to-serve meals, for EUR 22 million.

For the purpose of this Report and with a view to facilitating comparison of the information in the Non-Financial Statements, all the non-financial indicators referring to the divested business of Roland Monterrat have been excluded from the 2021 data and those corresponding to the business of InHarvest have been incorporated in 2022.

Contact point for issues regarding the report or its contents

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2. BUSINESS MODEL

The Ebro Foods Group is the leading food group in Spain, global leader in the rice sector and has a prominent global position in the categories of premium and fresh pasta, leader in the countries in which it operates. Through a network of 34 subsidiaries, it operates in the principal rice and pasta markets in Europe, North America and South East Asia, with a growing presence in other countries.

The main mission of the Ebro Group is to research, create, produce and put on the market high value-added foods that satisfy people's nutritional needs while improving their health and well-being, endeavouring at the same time to secure a transparent, efficient, sustainable business model.

The Group has a multi-company, multi-country and multi-brand business model. It has a decentralised culture in each of its subsidiaries for certain management areas, such as Commercial and Marketing, Logistics, Procurements, Human Resources and Environment, with a clear focus on an adequate business for each country, taking account of its specific idiosyncrasies, culture, laws, etc. At a higher level, the parent company (Ebro Foods, S.A.), with a light, dynamic structure, is responsible for defining the Group's overall strategy and management guidelines. Decision-making is prompted by the parent's board of directors.

The Ebro Foods Group is managed by business areas that combine the type of activity they perform and their geographical location. Our core business areas are:

- a. Rice: This covers the production and distribution of different rice varieties and their by-products and culinary supplements. The industrial and brand business follows a multi-brand model. It is present throughout Europe, the Mediterranean Arc, Southern Cone and South East Asia through companies in the Herba Group, and in North and Central America, the Caribbean and the Middle East through the Riviana Group.
- b. Fresh and premium pasta: This includes the production and marketing of premium dry pasta and fresh pasta. The fresh pasta business is conducted through the Ebro Premium Foods Group in France and Benelux, the Bertagni Group in a large number of countries and the Riviana Group with the Olivieri brand in North America. The business in the premium dry pasta segment is conducted through Garofalo (Italy and rest of world).

In both businesses, in keeping with the Group's undertaking to promote healthy eating, practically all our brands include a range of products in the health, bio and organic categories.

Global presence

The Ebro Group operates through a portfolio of 81 brands in 61 countries, with industrial and commercial facilities in 16 of them. In the remaining 45 countries, we only engage in commercial activity. Our industrial park comprises some 78 sites, including production plants, offices and warehouses.

List of countries with commercial and industrial presence

Argentina	Italy
Belgium	Morocco
Cambodia	Netherlands
Canada	Portugal
Denmark	Spain
France	Thailand
Germany	United Kingdom
India	United States

List of countries with only commercial presence

Algeria	Colombia	Hungary	Libya	Saint Martin
Angola	Costa Rica	Iceland	Lithuania	Saudi Arabia
Austria	Curaçao	Ireland	Mozambique	South Africa
Bahamas	Egypt	Israel	Oman	Sweden
Bahrain	Estonia	Jamaica	Panama	Switzerland
Bermuda	Finland	Japan	Peru	Tunisia
Brazil	Ghana	Jordan	Puerto Rico	United Arab Emirates
Chile	Greece	Kuwait	Qatar	US Virgin Islands
Czech Republic	Haiti	Lebanon	Romania	Yemen

Financial metrics

In 2022, the Group's net turnover was EUR 2,967.6 million up 22.3% on 2021. Our Adjusted EBITDA was EUR 334.6 million, a 10.9% year-on-year growth. Net profit on a like-for-like basis (i.e. excluding the contribution by the divested dry pasta businesses) was down 6.6% to EUR 135.6 million, while net debt stood at EUR 762.6 million, EUR 257.9 million more than at year-end 2021.

The company had a market capitalisation at 31 December 2022 of EUR 2,255.6 million.

Environment and trends

2022 was especially turbulent. The invasion of Ukraine by the Russian Federation on 24 February unleashed a succession of inflationary surges in the prices of numerous raw materials and energy. This supply "shock" coincided with the tail end of the COVID-19 pandemic, which had already put pressure on the markets of several materials and transport. As a result, many developed countries have experienced annual inflation rates close to two-digit figures.

The global GDP was estimated to have risen by 2.9% in 2022, with a growth of 1.9% in the United States contrasting with the 5.9% recorded in 2021, and 3.3% in the European Union (5.3% in 2021). The economic slowdown commenced as the monetary authorities adjusted their expansion policies from previous years, draining the system of liquidity, and imposed tougher financial conditions, causing a decline in consumer confidence.

The rate at which interest rates rose in the principal economies varied according to the margins their central banks had to act against inflation. The United States, with good employment figures and a smaller energy dependence, was able to apply a more restrictive monetary policy, while the European Central Bank followed the international situation.

The third lowest economic growth in the past three decades is expected in 2023, below only 2009 and 2020 (financial crisis and pandemic). In spite of this, the latest figures on growth, inflation, employment and housing sales allowed certain optimism and forecasts suggest that most of the world economies will avoid a technical recession.

From the point of view of consumption, the pandemic can be considered over. Some consumption patterns that emerged during the pandemic are here to stay, but the pace of change is easing and is now similar to the situation prior to 2020.

The growth of e-commerce has slowed and local supermarkets have taken centre stage in traditional commerce. Owing to inflation and the crisis indicators, hard discount is gaining weight within distribution, with growing numbers of outlets and market shares.

Meanwhile, business in the hospitality sector has fully recovered. Despite inflation, post-covid habits seem to be holding their ground and people's need to socialise is stronger than their budget restrictions.

The general trends are towards:

Increased personal consumer experience, sustainability, health, pleasure and price

Consumers now have greater decision-making capacity, more information and more shopping tools, and they are willing to pay more for products they can relate to and that meet their desires.

This is associated with:

- a. Demand for quality products that are easy to prepare and immediately satisfy their wish to buy.
- b. Preference for natural, healthy, organic products. The increased consumption of fresh products and the importance given to small companies and start-ups that make consumers feel in touch with nature are very much in tune with this sentiment.
- c. Search for sustainable products corresponding to the circular economy that are sustainable and include different players in their preparation and sale. An ethical base is created in respect of what is consumed.
- d. Desire for a wider choice. Quality private label brands have broadened their customer base, spanning practically all social classes and segments of population. Thanks to inflation, private label brands become more prominent in the shopping basket.

Social changes

- a. Ageing population, increased power of older generations. The baby boomers have transformed this segment of the population; their purchasing power has increased and their aspirations and needs (activity and health) differ from those traditionally associated with this social group.
- b. Smaller families, with a constant growth in the number of single-member households; new formats and customised goods and services.
- c. The younger generations are more concerned about social and environmental issues and sustainability.
- d. Increased mobility and immigration in many developed countries, accompanied by new tastes and ways of preparing food.

New channels and services

- a. On-line shopping and connectivity (possibility of shopping through traditional operators, who offer easy use, fast deliveries, etc.).
- b. Growth of local supermarkets, with more frequent shopping and increased availability (24-hour opening, alliances with filling stations or other high-traffic points).
- c. Consolidation of virtual stores, such as Amazon, and appearance of other new players in the distribution market along with the new consumer trends and the use of technology.
- d. New ways of cooking or consuming food (by order, through vending machines, snacks as meal substitutes, etc.).

All these changes have brought new challenges for distributors and producers, making it essential to convert both physical and digital points of sale into strategic centres. Adequate visibility and variety is key to success.

The technological revolution, plus the fact that digital natives are now a sales target, has brought radical change in how brands communicate. From the message to the media. The appearance of influencers as a channel and recommendation as a strategy have also changed how brands act. Investments in advertising are shifting towards digital media, which currently account for over 50% of the Group's publicity actions. These actions are characterised by their agility, including permanent listening to consumers up to the launching of products, which shortens times and enables us to react more swiftly.

Finally, our commitment to sustainability throughout the value chain is fundamental: Convenience + Health + Sustainability are the drivers of innovation.

Strategy and value creation

The Group's strategy focuses on becoming a major player in the rice, fresh pasta, premium dry pasta and healthy grains markets, and in other cross categories within the 'convenience' segment. Within that strategy, the Group has the following goals:

- Reach a global position in our relevant markets, open to the incorporation of related products.

- Consolidate our status as a benchmark business group in our different business areas, leading in markets where the Group finds potential.
- Lead innovation in the geographical areas in which we are present.
- And establish ourselves as a responsible enterprise, committed to social well-being, environmental balance and economic progress.

To refine our strategy, the Group is underpinned by general principles of conduct and growth levers that are considered vital to raise the value of our business and step up our firm commitment to sustainable development.

Principles of conduct

- Foster ethical management based on good governance practices and fair competition.
- Comply with the laws in place, acting at all times with a view to preventing and minimising not only economic risks, including tax risks, but also social and environmental risks.
- Seek a return on investment while guaranteeing the operational and financial soundness of its business activities. Uphold business profit as one of the bases for the future sustainability of the company and the large groups of agents directly and indirectly related with it.
- Generate a framework of labour relations that favours training and personal and professional development, respects the principles of equal opportunities and diversity and promotes a safe, healthy working environment.
- Reject any form of abuse or violation of the fundamental and universal rights, in accordance with international law and practice.
- Promote a relationship of mutual benefit with the communities in which the Group is present, proving ourselves sensitive to their cultures, contexts and needs.
- Satisfy and anticipate the needs of our customers and end consumers, offering a broad array of products and healthy, differentiated food.
- Steer the processes, activities and decisions of our company not only to generate profits, but also to protect the environment, prevent and minimise environmental impact, optimise the use of natural resources and preserve biodiversity.
- Develop a framework of responsible, true, transparent dialogue and communication with stakeholders, establishing stable communication channels and providing stakeholders regularly and transparently with rigorous, accurate, important information on the Group's activities.

To achieve the strategic goals set for growth and sustainable leadership and ensure that we comply with our principles of conduct, the Group applies the following guidelines:

1. Search for organic and inorganic growth in countries with high levels of consumption and/or high growth potential.

- Move into new territories or categories, paying special attention to new fresh products and new ranges of ingredients with greater value added.
 - Develop products that offer a complete culinary experience, extending our catalogue with new formats, flavours and ready-to-serve meals.
 - Achieve leadership in mature markets, opting for differentiation based on product quality. Expand and lead the premium category by developing the enormous potential of our flagship brands.
 - Broaden our geographical presence and complete our product/country matrix:
 - Seeking business opportunities in mature markets with a business profile similar to ours and in specialist market niches that allow us to shift our strategy from a generalist position to that of a multi-specialist (individual solutions).
 - Expanding into new business segments within markets in which we are already present or markets with considerable potential for growth.
2. Differentiation and innovation, investing in two aspects to enhance our product range:
- Research, development (R&D) and innovation through our own research, development and innovation centres and an investment policy that enables us to convert new ideas and needs into reality for our customers and end consumers.
 - Focus on leading brands in their respective segments, together with a commitment to invest in advertising to promote their development.
3. Low risk exposure. The Ebro Group deals with change in the consumer and financial markets and social change with a firm vocation to adaptation and permanence.
- To achieve this, we endeavour to secure: (i) balanced sources of recurring income (markets, currencies), (ii) low leverage so that it can grow without exposure to “financial turmoil”, (iii) new supply channels and (iv) long-term relations with its stakeholders (customers, suppliers, authorities, employees and society).
4. Implementation of sustainability throughout the entire value chain (“from the farm to the table”) through the Sustainability Plan RUMBO A 2030 [“Heading for 2030”], which focuses on:
- **People.** The development of plans and measures to enhance respect for human rights in our business transactions and the well-being of our professionals at work, promoting continuous training and professional development to retain talent, seeking formulas to enhance their work-life balance, equality and diversity, and health and safety at work, while driving initiatives that foster social and economic progress and help to reduce inequality in the communities in which we operate.
 - **Health and well-being.** The promotion of health through food, offering natural, healthy, differentiated food products that help consumers maintain a healthy diet

and lifestyle and provide pleasure. The R&D and innovation department works with these premises and the different communication channels of our brands focus their message on encouraging healthy eating habits and creative ways of eating through recipes, blogs and advertising campaigns.

- **Our planet.** The preservation and minimising of our environmental impact throughout the entire value chain, paying special attention to mitigating and adapting to the effects of climate change. With this in mind, either individually or jointly with other stakeholders, the Group promotes sustainable agriculture programmes in our main sourcing areas, fosters energy efficiency measures and the use of green energies, and develops different initiatives aimed at securing the Group's transition towards a circular economy, such as recycling packaging materials, replacing plastics and reusing and recycling waste.

3. CORPORATE SOCIAL RESPONSIBILITY AND SUSTAINABILITY MODEL

Definition of the model

The Ebro Group considers sustainable growth one of the basic pillars of its management strategy, to secure its consolidation as a benchmark business group in its areas of activity and position itself as a global, sound, innovative, responsible enterprise committed to social well-being, environmental balance and economic progress. Accordingly, it has incorporated environmental, social and ethical criteria in its decision-making processes, alongside the typical economic variables.

In this context, the Ebro Group views Corporate Social Responsibility (CSR) as the creation of a sustainable business model, which, as well as contributing value, profitability and competitiveness, contributes towards the progress of society, generates trust among our stakeholders and leads to the creation of shared value for all those who interact with us in our business activities.

The Group has followed a four-stage procedure to define and design this CSR model:

1. Diagnosis of the sustainability measures taken by the different companies in the Group.
2. Analysis of our value chain with a view to identifying the potential risks and impacts, both positive and negative, of our operations. Within this process we have identified three key areas, in which we can make the most valuable contributions to society as they are inherent in our core business and present throughout the entire chain: (i) nutrition and health, (ii) agricultural development, by promoting and implementing sustainable agricultural practices, and (iii) environmental management.
3. Interaction with our internal and external stakeholders, which has enabled us to identify their main concerns and incorporate their suggestions in the design and implementation of the Group's action plans.
4. Materiality analysis: In 2022, following the guidelines of the new Corporate Sustainability Reporting Directive (CSRD), we worked with KREAB Spain on making a double materiality assessment. In this regard, our present materiality matrix contemplates the most important sustainability issues from the perspective of business continuity (financial materiality) and those more important by virtue of their environmental, economic or social impact on the Group's stakeholders or the natural environment (impact materiality).

Double materiality assessment

This assessment was based on the areas of action and impacts of Ebro Foods grouped by topics and indicators, with reference to the following standards and legislation: (i) Act 11/2018 Spain, (ii) RS Global Reporting Initiative (GRI), (iii) Dow Jones Sustainability Index (DJSI), (iv) MSCI and (v) SASB Materiality Map – Sustainability Accounting Standards Board Food and Beverages.

Following a study of the catalogue of impacts, the different indicators have been grouped into 18 material topics, in turn grouped into 4 major categories of topics encompassing the different

themes: Working Capital, Governance and Organisation, Human Capital and Environmental Capital.

CATALOGUE OF POTENTIAL MATERIAL TOPICS

TOPICS THAT STAKEHOLDERS HAVE BEEN ASKED ABOUT IN THE DIFFERENT CONSULTATIONS

1. WORKING CAPITAL	1. Food quality and safety
	2. Consumer satisfaction
	3. Innovation
	4. Responsible supply chain
2. GOVERNANCE AND ORGANISATION	5. Good governance
	6. Tax contribution and institutions
3. HUMAN CAPITAL	7. Health and safety of professionals
	8. Human rights
	9. Social impact and local communities
	10. Talent attraction and retention
	11. Diversity and inclusion
	12. Development of human capital
4. ENVIRONMENTAL CAPITAL	13. Circular economy and use of resources
	14. Mitigation and adaptation to climate change
	15. Food waste
	16. Pollution control and prevention
	17. Biodiversity and ecosystems
	18. Water and marine resources

Seven countries were consulted for the assessment (Spain, United Kingdom, United States, Italy, Netherlands, India and Thailand), selected according to three essential criteria:

1. Importance for business
2. Interest in sustainability matters
3. Combination of developed and developing countries

Seven stakeholders were also consulted, as priority communities for the company:

- Internal: employees and executives
- External: customers, suppliers, third sector, media and investors

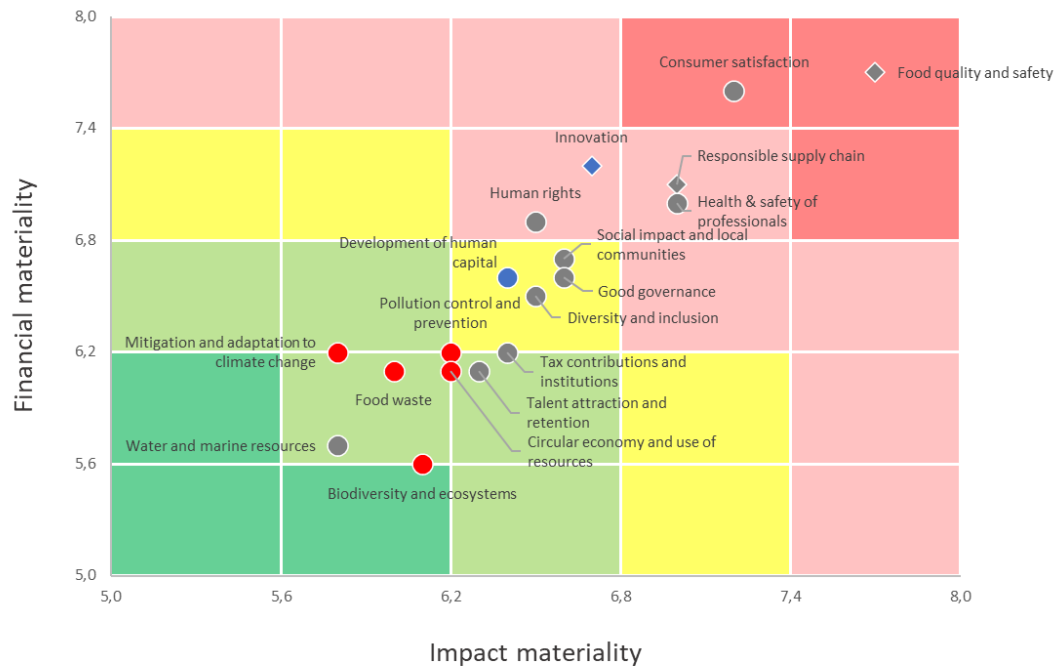
Four variables were analysed:

1. Impact materiality: the matters of greatest importance for the different communities, from the point of view of the impact generated on the environment or society by the Group's management of them.
2. Financial materiality: a concept contemplated by EFRAG only for executives, and

assessed with the following question: How could management of the following elements affect the company's operations (revenue, costs, liquidity, debt or asset value)?

3. Most important topics: those considered most important by the different segments of their stakeholders. (This would be equivalent to the former materiality.)
4. Priority areas for improvement: identification of the principal areas for improvement in which Ebro Foods should make progress.

Based on the foregoing, the resulting double materiality matrix and the principal topics to be managed are shown below:



● Priority areas for improvement ● Rather important areas for improvement ● Non-priority areas for improvement ◆ Topics considered most important

PRINCIPAL TOPICS TO BE MANAGED

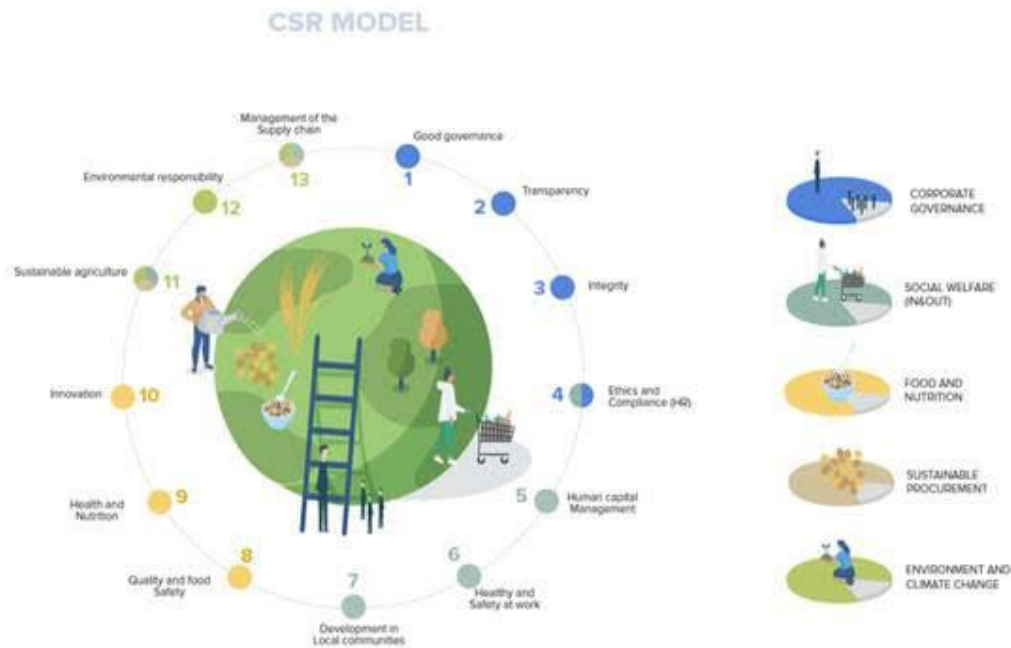
The principal topics to be managed by Ebro Foods, on the grounds that they are financially important, materially important or both, are, from a global, aggregated perspective:

- 1. Food quality and safety
- 2. Consumer satisfaction
- 3. Responsible supply chain
- 4. Health and safety of professionals
- 5. Innovation
- 6. Human rights
- 7. Social impact and local communities

Working areas in CSR and Sustainability

The conclusions of the double materiality assessment confirmed that the five strategic focal points identified by the Group coincide with the expectations of the different stakeholders: **Our Team, Our Community, Our Public, Our Shareholders and Our Environment**, and the corresponding five areas for action organised around the economic, environmental, social and governance pillars, namely: **Corporate Governance, In&Out Social Well-Being, Food and Nutrition, Sustainable Procurement and Climate Change**.

Thirteen principal working priorities are established around these focal points and areas for action to guarantee sustainability in each aspect of our business.



To make these 13 priorities effective, our Global Sustainability Plan (GSP) HEADING FOR 2030 [“HEADING FOR 2030”] lays down the guidelines and action plans that the Ebro Group will implement up to 2030 to grow sustainably, complying with the stipulations established in the regulatory framework of the EU and the different countries in which we operate, meeting the demands and expectations of our stakeholders, contributing towards achievement of the 2030 Agenda and minimising the negative impacts that our operations may have on the environment while maximising the positive effects of those activities.

The three main pillars of action of HEADING FOR 2030 are people, health through food and the planet.

With regard to people, the Plan promotes the well-being at work of our professionals, supporting ongoing training and professional development to retain talent, seeking ways to balance work and home life and ensuring equal opportunities, diversity and health and safety at work. It also continues to implement actions that contribute towards social and economic development in our areas of influence.

Our primary goals in caring for the planet are to guarantee the environmental efficiency of all the Group’s operations, working to mitigate and adapt to the effects of climate change and guarantee the sustainability of our principal raw materials.

As for the third pillar, with the aim of securing the health and well-being of our consumers and the society at large, the Plan focuses on supplying a broad array of safe, healthy products, overseeing the quality and food safety of those products and actively promoting healthy eating habits and lifestyles.

A specific microsite has been set up as an information and monitoring tool for the Plan, on the domain caringforyouandtheplanet.com, the Group’s motto in CSR and Sustainability.

Alignment of the model with the Sustainable Development Goals (SDGs)

All the actions taken by the Ebro Group within its Social Responsibility and Sustainability framework are related directly or indirectly with the 17 SDGs, but we have singled out the ones to which we make the greatest contribution by virtue of our business activities.

So based on our Sustainability Plan HEADING FOR 2030, we have defined the following priority SDGs: 1 (No poverty), 2 (Zero hunger), 8 (Decent work and economic growth), 10 (Reduced inequalities), 12 (Responsible consumption and production), 13 (Climate action) and 17 (Partnerships for the goals).

Alliances with environmental and social entities and initiatives

The Ebro Group and its Foundation belong to or have established alliances with different organisations or multi-stakeholder platforms that encourage and channel companies' commitment to society and the environment. Through these alliances they can give greater scope to the actions developed within their CSR strategy. Some of the important organisations are:



Signatory of the United Nations Global Compact

www.pactomundial.org



Member of the Spanish Commercial Coding Association (AECOC) project against food waste
"Don't waste food, use it"

<http://www.alimentacionsindesperdicio.com/>



Member of the SERES Foundation

<http://www.fundacionseres.org/Paginas/Inicio.aspx>



Member of Forética

<http://www.foretica.org/>



Sustainable Agriculture Initiative (SAI) Platform

<http://www.saiplatform.org/>



Sustainable Rice Platform (SRP)

<http://www.sustainablerice.org/>

Policies and Governance

In order to define the general guidelines of the Group and its associates and the integration of ESG criteria in our business model, the Group is governed by the following policies and principles of conduct approved by the Board of Directors:

1. Code of Conduct of the Ebro Group
2. Supplier Code of Conduct
3. Sustainability, Environment and Corporate Social Responsibility Policy
4. Social Policy
5. Risk Control and Management Policy
6. Corporate Governance Policy
7. Corruption and Bribery Policy
8. Internal Code of Market Conduct
9. Policy for the Selection and Diversity of Directors
10. Senior Executive Remuneration Policy
11. Dividend Policy
12. Investment and Financing Policy
13. Treasury Stock Policy
14. Policy on Communication and Relations with Shareholders, Institutional Investors and Proxy Advisors
15. Policy on Communication of Financial, Non-Financial and Corporate Information

The strategy and actions taken in the area of Social Responsibility and Sustainability of the Group are supervised by the Audit, Control and Sustainability Committee of Ebro Foods, which in turn reports to the Board of Directors of the company on the most important aspects.

External assessments

Since 2015, Ebro Foods has been part of the FTSE4Good Index Series, an international sustainability index that includes companies that prove their commitment and leadership in environmental, social and corporate governance aspects. Our inclusion in this index confirms that we are a socially responsible investment vehicle.

During 2022, we obtained the following external accolades:

1. Inclusion in the Standard Ethics Spanix Index
2. Inclusion in the IBEX Gender Equality Index for promotion of gender equality

3. Gaia ESG Rating

Taxonomy of the European Union

With a view to reorienting capital flows towards more sustainable activities, meeting the EU 2030 framework for climate and energy and achieving the goals of the European Green Deal, on 22 June 2020 the EU published Regulation (EU) 2020/852, known as the Taxonomy Regulation.

The Taxonomy Regulation establishes six environmental objectives:

1. Climate change mitigation
2. Climate change adaptation
3. The sustainable use and protection of water and marine resources
4. The transition to a circular economy
5. Pollution prevention and control
6. The protection and restoration of biodiversity and ecosystems

The Regulation also establishes the four conditions that must be met by an economic activity to qualify as environmentally sustainable:

1. It must contribute substantially to one or more of the six environmental objectives.
2. It must not significantly harm any of the other environmental objectives.
3. It must be carried out in compliance with the minimum (social) safeguards laid down in Article 18 of the Taxonomy Regulation.
4. It must comply with technical screening criteria that have been established by the Commission through specific delegated acts.

Accordingly, a first delegated act was passed on 21 April 2021 on sustainable activities for climate change adaptation and climate change mitigation. The delegated regulation was formally adopted on 4 June 2021 (Commission Delegated Regulation (EU) 2021/2139). A second delegated act for the remaining objectives has not yet been published.

On 6 July 2021, the European Commission adopted the delegated act (2021/2178) specifying the contents, methodology and presentation of the information to be disclosed by financial and non-financial undertakings.

Application of the Taxonomy in Ebro Foods

The Taxonomy Regulation stipulates that undertakings subject to the Non-Financial Reporting Directive (NFRD) are obliged to disclose how their business activities align with the Taxonomy according to the following calendar:

2022	2023
January	January
Obligation to disclose <u>taxonomy-eligible activities</u>	Obligation to disclose <u>taxonomy-aligned activities</u>



In line with this directive, during 2021 the Social Responsibility, Sustainability and Finance departments of Ebro Foods, as parent of the Group, analysed the current alignment between the environmental actions promoted by the companies in the Ebro Group and the taxonomy-eligible activities contemplated in the current Taxonomy framework, and the financial details associated with those environmental actions.

According to the results of that analysis, the current development of taxonomy does not contemplate the business activities performed by the Ebro Foods Group as taxonomy-eligible activities. Consequently, nor does the Group have any taxonomy-aligned activities to report in 2022.

The main conclusions of the analysis are set out below:

1. For the time being, the EU Taxonomy has only developed the economic activities corresponding to two environmental objectives: i) climate change mitigation and ii) climate change adaptation, which do not so far cover the entire range of activities undertaken by the companies. In this regard, the economic activities performed by the companies of the Ebro Group, classified within the EU Statistical Classification of Economic Activities (NACE) C1061 (manufacture of grain mill products), C1073 (manufacture of pastas) and C1085 (manufacture of prepared meals and dishes), are not included within the framework of taxonomy-eligible activities.
2. The environmental actions taken by the Ebro Group in the area of climate change mitigation and adaptation: (i) are included among the environmental sustainability objectives of the company, and (ii) are not environmentally sustainable economic activities as they do not have associated revenue, they have negligible OpEx and CapEx, close to zero, and they do not substantially contribute towards the two environmental objectives of the Taxonomy defined so far.
3. Although they do not meet the conditions for qualifying as taxonomy-eligible activities, some of the Group companies launched autonomous energy consumption actions during 2022 that could be classified within group “4.2.4 production of heat/cold from bioenergy”, although its representativity is negligible.

The EU is expected to publish the delegated acts corresponding to the other four environmental objectives of the Taxonomy during 2023. The Group will then study whether they contemplate any eligible activities associated with its business activities and, if so, it will put in place the necessary reporting procedures.

4. RISK MANAGEMENT

As one of the corporate policies approved by the board of directors, the Risk Control and Management Policy lays down the basic principles and general framework for control and management of our business risks, including tax risks, and internal control of financial reporting to which the Company and other Group companies are exposed.

Within this general framework, the integral, homogenous Risk Control and Management System is based on the preparation of a business risk map, where risks are identified and assessed and risk management capacity is graded to obtain a ranking of risks from greater to lesser impact for the Group and their probability of occurrence. The risk map also identifies the measures to mitigate or neutralise the risks identified.

The risk universe is grouped into four main groups: compliance, operational, strategic and financial. The first three groups also include the principal non-financial risks related with the company's business. We describe these non-financial risks below:

Compliance risks

1. Sector regulation. The agro-industrial sector is subject to numerous regulations affecting export and import quotas, customs duties, intervention prices, etc., subject to the guidelines set down by the Common Agricultural Policy (CAP). The Group's activity may also be affected by changes in legislation in the countries where the Group sources raw material or sells its products.

The Group deals with this risk by participating in or echoing the different legal and/or regulatory forums through a number of prestigious professionals who endeavour to secure adequacy and compliance.

Within this group, the increasingly strict laws on the use of fungicides and pesticides on the basic crops for this industry, especially rice, are becoming more and more important and linked to other operational risks such as supply and food safety.

To mitigate this risk, the Group has stepped up its quality controls and checks to detect this type of product, working on a selection of protection providers, who are going to be asked to incorporate sustainability criteria in their policies, and providing more education for growers to seek natural alternatives for these products.

2. General regulation. This includes compliance risks concerning civil, mercantile, criminal and governance laws and regulations. To help deal with criminal risks, the Group has a Crime Prevention Model, which covers our Spanish companies. Our principal subsidiaries have similar structures, adapted to their respective local laws and regulations. The Compliance Unit monitors and controls them all.

One specific part concerns respect for and compliance with Human Rights in accordance with the ethical standards promoted in the Group's Code of Conduct. To prevent and mitigate this risk, the Group has different SMETA audits made every year on its supply chain and implements internal awareness and training plans. In accordance with the EU 'Proposal for a Directive on corporate sustainability due diligence' published on 23 February 2022, the company has set itself the goal for 2023 and 2024 of making an exhaustive analysis to identify any risks of adverse human rights impacts both inside and outside the consolidated Group and develop a Due Diligence System.

3. Tax laws. Any change in the tax laws or their interpretation or application by the competent authorities in the countries in which the Group operates could affect our earnings.

To mitigate this risk, the Group, directed by those responsible for taxation, monitors the tax laws and possible interpretations thereof, requesting specific reports from specialists to support its stand, guided at all times by a principle of prudence in this matter.

In the process of classifying risks, a dynamic assessment is made of both inherent risk and the residual risk after applying the internal controls and protocols established to mitigate them. Those controls include preventive measures: an adequate segregation of duties, clear levels of authorisation and the definition of policies and procedures. These controls can in turn be grouped into manual and automatic, the latter being implemented by computer applications.

This model is both qualitative and quantitative and can be measured in the Group's earnings, so the risk level is considered acceptable or tolerable on a corporate level.

The Risk Control and Management System is dynamic, so the risks to be considered vary with the circumstances in which the Group operates.

The Risk Control and Management System, including tax risks and control of financial reporting, is based on the following structure:

- ✚ The Board of Directors, as the body ultimately responsible, determines the risk control and management policy, including tax risks and control of financial reporting.
- ✚ The Audit and Compliance Committee, through the Risks Committee, supervises and monitors the financial reporting and risk control systems, regularly informing the Board of any material aspects occurring in these areas. It is also responsible for supervising and overseeing internal control of the Group and the Risk Management Systems, and for proposing to the Board the risk control and management policy and any measures for enhancing these areas.
- ✚ The Risks Committee, based on the policy established by the Board and supervised by and answering to the Audit Committee, is specifically responsible for coordinating and monitoring the risk control and management system, including the Group's financial reporting and tax risks. The analysis and assessment of risks associated with new investments also falls within the remit of the Risks Committee.
- ✚ The Management Committees of the different units, on which the Chairman of the Board and the Chief Operating Officer (COO) sit, assess the risks and determine the measures to be implemented.
- ✚ Risk officers in the different units. The Risks Committee appoints officers in the major subsidiaries to monitor the Risk Control and Management System, including tax risks and financial information, and reporting to the Committee.
- ✚ Internal Audit Department. Within the internal audits made of the different subsidiaries, the company's Internal Audit Department checks that the financial reporting and risk management testing and control have been conducted adequately, complying with the indications of the Risks Committee.

Operational risks

1. Food safety. Given the nature of the business, aspects regarding food safety are a critical point to which the Group pays special attention, being bound by a large number of laws and standards in each of the countries in which our products are produced and sold.

The Group's policy is based on the principles of compliance with the laws in force from time to time and guaranteeing food safety and quality.

The food safety programmes are based on following protocols to identify and control certain critical points (Hazard Analysis and Critical Control Points –HACCP-), so that the residual risk is minimal.

The main control points are grouped into:

- Physical points: controls to detect foreign bodies or the presence of metals
- Chemical points: detection of chemical elements or the presence of allergens
- Biological points: presence of elements such as salmonella or any other kind of pathogens.

Most of our handling processes have obtained IFS (International Food Safety), SQF (Safe Quality Food) and/or BRC (British Retail Consortium) certificates, recognised by the Global Food Safety Initiative (GFSI) as food product certification standards, as well as local and special product certificates (Kosher, gluten-free or Halal foods).

The Group has also defined, developed and implemented a quality, environment and food safety management system compliant with the requirements of the standards UNE-EN-ISO 9001 (Quality management), UNE-EN-ISO 14001 (Environmental management) and ISO 22000 (Food safety management).

2. Technological (trailing behind) risk. One of the most important tools for standing up to competition is differentiation and product alignment, which is based on constant technological innovation and the endeavour to adapt to consumer desires. The R&D and innovation strategy is a fundamental part of the Group's general strategy. The R&D and innovation departments, in close collaboration with the Commercial and Marketing departments, work on reducing this risk.
3. Cybersecurity. The exponential growth of internet access exposes companies and users to different types of attack: identity theft, malware, attacks on websites, zero-day attacks, etc. The Group has an action plan contemplating: (i) the ongoing training of personnel on these threats, (ii) the definition of an adequate network infrastructure (firewalls, Wi-Fi access, network electronics, browsing possibilities and design of connected industrial networks), (iii) the correct definition of user points (antivirus, mobile device management systems, permissions, updates) and (iv) a programme for data preservation and management (back-ups, use of the cloud, shared information).

Environmental and strategical risks

1. Environment and natural risks. Drought and flooding in the commodity-producing countries can cause problems of availability and price instability. These natural risks can also affect consumers in the affected regions or even the Group's assets in those locations.

The best way of mitigating this type of risks is to diversify both the sourcing of raw materials and the countries in which our products are sold. The Group also makes sure it has flexible production capacity with plants in four continents, which minimises possible local problems. In addition, the Group has taken out insurance policies covering all its plants and sites, which would mitigate any disaster that could jeopardise their value.

2. Climate change. Climate change encompasses several risks with growing impact in the short, medium and long term, which might directly affect the development of our business activities and which, owing to their cross-cutting nature, are already largely included in the risk matrix of the Ebro Group. These risks include, on the one hand, the physical risks deriving from the increase in extreme climate events throughout the world, as well as chronic changes in the environment and, on the other hand, those deriving from the transition towards a decarbonised economic model, including changes to the law or in the behaviour of economic operators, the development of energy efficient alternative technologies, changes in market preferences or reputational factors associated with the activities having a greater impact.

Accordingly, in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), in 2020 the Group made an analysis to identify the potential risks, impacts and opportunities that climate change may have in our Organisation, establishing appropriate mitigation and/or adaptation measures for each one, the vast majority of them contemplated in our sustainability plan **HEADING FOR 2030**: (i) make a more efficient consumption of water and energy to reduce Scope 1 and 2 emissions; (ii) increase the use of green energies, re-use and reduce waste; (iii) use recyclable packaging; (iv) reduce GHG emissions in logistics; (v) implement sustainable agriculture models.

Types of risk	Risks	Impacts	Measures
Financial Operational Strategic	Extreme climate events: droughts, torrential rain, hurricanes...	<ol style="list-style-type: none"> 1. Changes in the quality and quantity of crops 2. Volatility of raw material prices 3. Production standstill owing to damage to own and/or third-party infrastructures 4. Rise in consumer prices 	<ol style="list-style-type: none"> 1. Geographical diversification of sourcing areas 2. Diversification of product portfolio 3. Anticipation of possible risks of climate-related events when choosing the locations of our workplaces 4. Permanent innovation

Types of risk	Risks	Impacts	Measures
Strategic Operational	Rise in temperatures	<ol style="list-style-type: none"> 1. Drop in consumption of seasonal products 2. Changes in consumer habits 3. Greater energy consumption 4. Changes in crop yield 	<ol style="list-style-type: none"> 1. Diversification of product portfolio 2. Innovation 3. Improvement of energy efficiency 4. Innovation in agricultural technology, seed varieties 5. Sustainable agriculture
Financial	Raising of taxes and energy, water or transport levies	Lower profitability, new investments to adapt to a changing environment	<ol style="list-style-type: none"> 1. Improvement of energy efficiency 2. Optimisation and sustainability of logistics 3. Promotion of and incentives for sustainability within the company
Financial Compliance	Laws and Regulations imposing limits on emissions and related sanctions	Financial, need to make new investments to adapt to the changing laws	<ol style="list-style-type: none"> 1. Anticipation of new legal requirements, analysing trends, participating in forums, etc. 2. Consistent internal regulatory framework on the matter 3. Promotion of and incentives for sustainability within the company
Reputational Strategic	Negative image due to absence of or failure to meet commitments related with climate change	<ol style="list-style-type: none"> 1. Brand image, reputation 2. Loss of business 	<ol style="list-style-type: none"> 1. Publication of the company's good environmental practices 2. Participation in sectoral forums and environment-related entities
Reputational Financial	Outflow of investment/shareholders' funds due to not complying with required ESG criteria	<ol style="list-style-type: none"> 1. Image, reputation 2. Stock market instability 	<ol style="list-style-type: none"> 1. Consistent internal regulatory framework on the matter 2. Publication of the company's good practices 3. Proactive communication approach

Faced with the stringent national and European regulatory framework put in place over the past year and the growing pressure from ESG analysts and investors, the Group aims to further analyse climate-related risks in the next two years, paying special attention to the risks of transition and designing a climate action plan in accordance with the Paris Agreements to ensure our compliance with the law and the compatibility of our business model and the company's strategy with the transition towards a sustainable economy. Similarly, in accordance with the Climate Change and Energy Transition Act 7/2021, another task to be undertaken will be to quantify the financial impact on the

Group of climate change-related risks, following the metrics specified in the Royal Decree expected to be passed no later than May 2023.

3. Reputational risk. This risk is associated with possible changes of opinion, giving rise to a negative perception of the Group, its brands or products by customers, shareholders, suppliers, market analysts, etc., which could have an adverse effect on the Group's ability to maintain relations (commercial, financial, labour, etc.) with its environment.

To deal with this risk, the Group has approved a Code of Conduct to guarantee ethical, responsible conduct by the organisation, its employees and all persons and institutions with which it interacts in the course of its business activities.

In this context, we have included as a significant risk unfounded negative comments or opinions that can so easily be posted in the social networks, owing to the very limited possibilities of controlling them other than close monitoring and specific communication actions to reverse their impact.

The Group's brands and employees are our most valuable intangible assets, so they are submitted to continuous assessment, considering different aspects, such as management, marketing, health and food safety, compliance and legal defence of intellectual property.

4. Changes in lifestyle. The proliferation of low carbohydrate diets and other food trends can have a bearing on consumers' perception of our products.

These risks can be mitigated by assessing consumption patterns and adapting the offer of products to the alternatives on the market, while participating actively in social forums to encourage healthy habits that are compatible with our products.

NB: Further information on the description of risks and risk control and management system is available in section 4 of the Management Report and section E of the Annual Corporate Governance Report, both available on the corporate website.

5. HUMAN RIGHTS

Ensuring respect for Human Rights throughout our supply chain is one of the Group's priorities in Social Responsibility. We base our criteria in this respect on the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the Fundamental Principles and Rights at Work of the International Labour Organization (ILO).

This commitment is set out in: (i) our Code of Conduct, which establishes the principles and values that must underlie the actions of all persons and companies in the Ebro Foods Group, and (ii) our Supplier Code of Conduct, which establishes the principles, standards and business practices to be met by our suppliers and service providers in their relations with the Group and its professionals.

The Group's commitment to Human Rights is set out in Section IV, point 9 of our Code of Conduct. Points 9.1, 9.3, 9.4, 9.5 and 9.6 lay down the guidelines for eliminating discrimination in employment and occupation, eliminating forced or compulsory labour, effectively abolishing child labour and exercising the rights of freedom of association, to join unions and collective bargaining, in accordance with the laws currently in place. The same commitments are set out in points 3.2, 3.3, 3.4 and 3.7 of the Supplier Code of Conduct. Both Codes can be consulted on the Ebro Foods corporate website (<https://www.ebrofoods.es/en/csr/csr-in-ebro/codes-and-policy/>).

Due Diligence

With the aim of underpinning our commitment to human rights, in 2020 the Ebro Foods Group began exploring the implementation of a Due Diligence System to detect, prevent and mitigate existing and potential adverse effects of our operations and throughout our value chain.

A draft Due Diligence Questionnaire was prepared, which would be taken as the basis for defining, identifying, assessing and measuring risks, thus generating opportunities for subsequent verification and control, adopting the necessary, proportionate measures to mitigate, reduce or remedy those risks, as the case may be. The aim was to debate the contents of the questionnaire within the Group's Global Sustainability Working Party with a view to having a final document to be implemented. This process was finally delayed, pending publication of the final text of the *EU Corporate Sustainability Due Diligence Directive* and its transposition into Spanish law.

In this context, in the light of the Proposal for the EU Corporate Sustainability Due Diligence Directive, published on 23 February 2022, and with a view to facilitating the identification of risks within and outside the consolidated group, in 2022 the parent of our Group promoted the launching of a compulsory training course in Human Rights for all the company's professionals. This course will end in 2024 and has the following course plan:

- 1) Spain, commenced
- 2) Rest of Europe, Africa and Asia
- 3) North and South America

This Training Plan, the contents of which have been tailored to the different professional categories, is being followed online through the SAP Litmos e-learning platform by professionals with a corporate e-mail account, and onsite by factory staff.

In addition, specific Human Rights training has been given over 2022 in the following companies:

Company	2022			2021		
	No. employees who received training	No. hours	% total employees	No. employees who received training	No. hours	% total employees
Ebro India	23	204	12.85%	85	170	48.57%
Herba Bangkok	102	306	52.58%	198	594	100.00%
Herba Cambodia	6	18	40.00%	10	30	83.33%
La Loma Alimentos	159	81	100.00%	8	8	5.52%
S&B Herba Foods	17	4	15.18%	---	---	---
Transimpex	85	170	100.00%	75	150	100.00%

Grievance and follow-up mechanisms

The main grievance mechanism is the reporting channel of the Code of Conduct (canaldedenuncias@ebrofoods.es), through which any persons bound by the Code may report any breach of the principles set out therein, under a guarantee of absolute confidentiality. Only the chair of the Audit and Compliance Commission of the Group parent has access to that e-mail account, which is protected with IT security systems to prevent any unauthorised access. The Committee chair is responsible for prioritising, processing, investigating and solving grievances according to their importance and nature, assisted by the Compliance Unit.

Within the framework of the Proposal for a Due Diligence Directive, during 2023 the Group will enable an external complaints channel, in addition to the channel already existing, which will be at the disposal of all our stakeholders and conveniently publicised through all the corporate reporting channels.

Ebro is also in the process of integrating the different complaints channels currently enabled within the Internal Information System under Act 2/2023 of 20 February regulating the protection of individuals who report infringements of laws and regulations and the fight against corruption, transposing the EU Directive 2019/1937 of 23 October 2019 (known as the “Whistleblowing Directive”), which entered into force on 13 March 2023.

Apart from the Confidential Complaints Channel, the Human Resources Departments of the different companies in the Group also have channels enabled to process, investigate and solve any incidents that may arise within their respective companies.

In this context, eleven grievances were reported in 2022 in the Human Resources Departments of the following Group companies. Six of them had been solved by the closing date of this Report:

Company	2022		
	Lodged	Processed	Solved
La Loma Alimentos	1	1	1
Riviana Foods	6	6	1
S&B Herba Foods	2	2	2
Tilda	2	2	2
	11	11	6

External audits are conducted regularly in companies both within and outside the scope of consolidation of the Group as an additional tool for monitoring and control of Human Rights.

Audits made at Ebro Group workplaces

13 ethics audits were made at Group workplaces during 2022.

Company	Country	Workplace	Date	Type of audit	Auditors
Ebro India	India	Taraori	06/10/2022	SMETA	DNV
Herba Cambodia	Cambodia	Phonm Phen	25/04/2022	SMETA	ELEVATE
Herba Ricemills	Spain	San Juan	21/03/2022	SMETA	Intertek Spain
Pastificio Lucio Garofalo	Italy	Gragnano	05/07/2022	SA8000	DNV
Riviana Foods	United States	Brinkley	01/02/2022	SMETA	Accordia Global Compliance Group
		Memphis	05/05/2022	BSCI	
		Carlisle	02/02/2022	SMETA	
		Clearbrook	18/01/2022	SMETA	
		Alvin	08/03/2022	SMETA	
		Colusa	13/01/2022	SMETA	Control Union
S&B Herba Foods	United Kingdom	Regent mill	12/01/2022	SMETA	Bureau Veritas Certification
			18/05/2022	SMETA	
Herba Bangkok	Thailand	Nong Khae	26/10/2022	SMETA	SGS

Audits made on suppliers

54 SMETA audits were made on suppliers during 2022, 6 of them follow-up audits.

Country	Date of audit	Auditors
Argentina	13/07/2022	Bureau Veritas Certification
	14/07/2022	
	16/07/2022	
Belgium	19/09/2022	Intertek France
	25/01/2022	SGS CBE Belgium
Cambodia	19/08/2022	SGS (Cambodia) Limited
France	05/04/2022	SGS France
	17/05/2022	
	19/10/2022	
	03/02/2022	Bureau Veritas Certification
	21/07/2022	
	27/07/2022	
	15/06/2022	BUREAU VERITAS CPS - EMEA
	01/12/2022	
	05/09/2022	DNV
Germany	21/04/2022	Intertek Germany
	19/04/2022	

Country	Date of audit	Auditors
	05/05/2022	
	12/08/2022	Bureau Veritas Certification
	14/07/2022	TUV NORD CERT GmbH
Greece	07/07/2022	Intertek Bulgaria
	31/05/2022	SGS_UK
Hungary	01/07/2022	Bureau Veritas Certification
	26/05/2022	Bureau Veritas Certification
India	20/07/2022	SGS ASIA
	07/11/2022	
	18/03/2022	Intertek India
	22/06/2022	
	14/04/2022	Intertek Italy
Italy	06/06/2022	
	25/05/2022	SGS Italy
	23/11/2022	BUREAU VERITAS CPS - EMEA
Mexico	08/06/2022	DNV
Netherlands	25/08/2022	Bureau Veritas Certification
	04/10/2022	ALGI Pakistan
Pakistan	29/09/2022	ELEVATE
	16/07/2022	ALGI Pakistan
Peru	10/08/2022	SIPAS CR-PERU
Poland	03/11/2022	SGS Poland
Portugal	14/10/2022	Intertek Portugal
	02/09/2022	
	02/11/2022	
Thailand	17/03/2022	SGS Thailand
	19/09/2022	
	25/05/2022	
	14/02/2022	
Turkey	24/05/2022	Intertek Turkey
	22/02/2022	SGS_UK
	28/09/2022	Verisio
United Kingdom	01/08/2022	Intertek UK
	08/08/2022	
	21/11/2022	Verner Wheelock (incorporating KSSA)
	18/01/2022	Accordia Global Compliance Group (Home Office)
United States	23/02/2022	Intertek Peru

6. ANTI-CORRUPTION AND BRIBERY MEASURES

CORRUPTION AND BRIBERY

The Ebro Group has a global Code of Conduct, known to and binding on not only its workers and professionals, but also its customers, suppliers, shareholders and other stakeholders.

The Code of Conduct establishes the principal values that must underlie the Group's conduct, including those of transparency, honesty and strict compliance with the laws and regulations in place.

The Code of Conduct dedicates a specific section (29) to anti-corruption, bribery, illegal commissions, influence peddling and money laundering. It establishes the following general principles: (i) the obligation undertaken by the Group to eradicate any form of corruption and (ii) the absolute prohibition of any form of corruption or bribery. These principles are accompanied by specific rules of conduct designed to guarantee compliance with them.

All the Group's workers and professionals are informed of and accept the Code of Conduct as mandatory. They receive a copy of it when they join the Group (or after any amendment) and formally acknowledge receipt, knowledge thereof and their obligation to comply. This is backed up with a grievance channel through which any interested person may confidentially inform the parent company of any potential infringement of the Code.

The general regulation set out in the Code of Conduct is supplemented on a corporate level with the Policy against Corruption and Bribery approved by the parent's board of directors in April 2019. All the principles, values and rules for action established in the Code of Conduct for combating corruption and fraud are developed in the specific, verifiable terms of that Policy.

The global regulation of the Code of Conduct and the principles set out in the Policy against Corruption and Bribery are backed up locally in the different regions in which the Group operates.

- In the principal Spanish companies, the Ebro Group also has a crime prevention model that identifies the potential criminal risks deriving from its activities and the mitigation measures established to try to eliminate (or minimise as far as possible) the risk of committing criminal offences, which include corruption and bribery. The crime prevention model identifies the measures implemented to mitigate the risk of committing offences of corruption, bribery, influence peddling and money laundering. Its effectiveness and application are monitored and checked regularly by the Compliance Unit, within the reporting system of the current crime prevention model. During 2020 the Group revised and updated its criminal risk map and crime prevention model, with counselling from external specialists. Along with the revision and updating and with counselling from the same external specialists, the Group has started to design an employee training plan in this area.
- In pursuance of local legislation (Legislative Decree of 8 June 2001) on companies' liability for certain types of offence (including corruption), the Italian companies in the Group have established organisation and management models that include measures to preclude the risk of committing those offences.

- The Group's North American subsidiaries have specific policies and measures to control and mitigate the risk of committing this type of offence. All the employees of Riviana Foods Inc. and Riviana Foods Canada Corporation (jointly "Riviana") receive and are obliged to sign a copy of the Ebro Foods Group Code of Conduct as confirmation of having been informed of the requirements established in that Code and their strict adherence to the principles of the Code that are applicable to the company and its employees under North American laws and regulations. In particular, and in pursuance of the special requirements under local laws, the North American companies have an Anti-bribery Compliance Officer, who is responsible for ensuring compliance with the policy and making sure that all workers and executives are aware of and comply with it. Training and refresher courses are provided regularly for this purpose.
- The Group's Indian subsidiary has a Vigil Mechanism/Whistleblower Policy, adapted to the applicable local laws (section 177(9) of the Companies Act and Rule 7 of the Companies Rules), through which a communication channel is made available to all employees to report to the company any conduct that infringes the Code of Conduct (in addition to the Group's reporting channel). Through that channel, any possible indication of unlawful conduct (including, therefore, any that may be considered acts of corruption) must be reported to the Vigilance and Ethics Officer of the company for investigation and adoption of whatever measures may be necessary. All new hires in the Group's Indian subsidiary receive specific information within their inception training on combating corruption, including the general rules established in the Code of Conduct, the specific rules of the Vigil Mechanism and the hierarchical structure for reporting suspicious conduct. In addition, within that policy, due diligence is conducted on potential overseas customers and they are required to certify that they do not participate and have not participated in any acts of corruption or bribery.
- In France, following the sale on 31 December 2021 of the parent of the French Group, (Panzani SAS), the new parent of the business in France (Ebro Premium Food SAS) has been implementing its own "Ethics Alert device" and defining its own Code of Conduct, which will be applicable within Ebro Premium Food and its subsidiaries. This work, together with the drawing-up of a corruption risk map for the new French Group, commenced at the end of 2022 with specialist external counselling and will be completed in 2023.

The following table shows the companies that provided anti-corruption training for their employees in 2022. That ongoing training is included in regular training plans, thus ensuring that employee knowledge on the matter is constantly refreshed.

Company	2022			2021		
	No. employees	No. employees receiving training	% employees receiving training	No. employees	No. employees receiving training	% employees receiving training
Bertagni	417	417	100.00%	---	---	---
Ebro India	179	23	12.85%	175	25	14.29%
Geovita	---	---	---	101	11	10.89%
Harinas Santa Rita	---	---	---	18	18	100.00%
Herba Bangkok	194	195	100.52%	198	198	100.00%
Herba Cambodia	20	9	45.00%	---	---	---

La Loma Alimentos	---	---	---	116	4	3.45%
Ebro Foods Netherlands	---	---	---	80	27	33.75%
Riviana Foods	1043	1043	100.00%	919	919	100.00%
Riviana Foods Canada	237	237	100.00%	223	223	100.00%

No cases of corruption have been reported in any companies of the Ebro Group. Nor have any of the Group's business partners reported any cases of this nature.

MONEY LAUNDERING

The Ebro Group has established: (i) payment and collection processes and (ii) a structure of attorneys for bank transactions, through whom it guarantees adequate control and monitoring of money movements in all its transactions.

The Ebro Group uses bank transfers and nominative payment instruments for payments and collections as they guarantee full traceability of any money movement. It also has strict rules for cash management, which allow the different companies to hold only negligible amounts of cash and regulate in detail any drawings against the cash balances, requiring in all cases justification of cash requests and proof of use of those funds.

The reimbursement of expenses incurred by employees in the course of their work is also strictly controlled, requiring proof of the expense and the reason and justification for it prior to any reimbursement. Drawings made using a company bank card (by employees who have a card, by virtue of their category) are subject to the same requirements of proof and justification of use, such that if any use of the card is not justified and proved, the corresponding sums are withheld from payments to be made by the relevant company to the employee.

According to the Group's power of attorney structure, in order to draw funds from bank accounts, a prior decision by must be adopted by the competent corporate body and, as a rule, joint signatures are required, except for negligible amounts compared to the volume of transactions of the company in question.

7. VALUE CREATION MODEL

The Ebro Group makes a significant contribution to the social and economic development of the communities in which it operates. Its business activities generate wealth through the creation of jobs, payment of salaries, tax contribution, purchase of goods and services from suppliers, distribution of dividends, implementation of welfare programmes, development of environmental initiatives, commitment to the value chain and investment in R&D and innovation.

SOCIAL CASH FLOW

(EUR thousand)

	2022	2021
Economic value generated		
Net proceeds from operations	419,351	538,897
Sale of assets and businesses	27,411	753,926
Dividends received from third parties	2,319	4,350
	449,081	1,297,173
Economic value distributed	(334,371)	(375,518)
Payments to or on behalf of employees	(90,821)	(136,510)
Corporate income tax	(4,933)	(5,352)
Contribution to not-for-profit entities and support for sustainable agriculture	(5,562)	(8,384)
Interest income/expense	(48,556)	(24,063)
Business acquisitions	(118,808)	(120,035)
CAPEX	(96,528)	(185,719)
Dividends paid	(699,579)	(855,581)
Economic value retained	(250,498)	441,592

(*) Dividends paid in the corresponding year

TAX INFORMATION

With a view to guaranteeing responsible compliance with the tax laws in place in the jurisdictions in which it operates, the Ebro Group has developed several procedures to secure transparent, honest tax management and payment of taxes.

The Ebro Group does not use opaque structures consisting of interposing base companies in low-tax or non-tax countries and/or territories not cooperating with the tax authorities. Nor does it engage in any business in any of the jurisdictions listed as tax havens, regulated in Spain in **Supplementary Provisions 1 and 10 and Transitional Provision Two of the Tax Fraud Prevention Measures Act 36/2006 of 29 November (as amended by Act 11/2021 of 9 July on measures to prevent and combat tax fraud, effective from 11 July 2021)**.

In 2022, the Ebro Group directly paid EUR 97.2 million to the tax authorities in the different countries in which it operates.

Breakdown of tax payments

EUR thousand

Income tax paid

2022	2021
90,821	136,510

Taxes paid by geographic areas

	2022		2021	
	Net IT	Other Taxes	Net IT	Other Taxes
Spain	36,615	613	-1,801	408
Rest Europe	24,426	2,492	54,747	3,275
America	29,067	3,304	82,536	3,161
Asia	170	0	70	0
Africa	543	0	958	0
Total	90,821	6,409	136,510	6,844

Most significant countries

	Net IT	Other Taxes	Net IT	Other Taxes
Spain	36,615	613	-1,801	408
France	6,245	2,226	17,792	1,582
Italy	5,133	208	15,085	149
United States	11,690	3,196	72,422	2,892
United Kingdom	5,879	0	7,114	0

Pre-tax profit, by countries

EUR thousand

	2022	2021
	Pre-tax profit	Pre-tax profit
Spain	-315	29,888
Rest Europe	74,130	88,115
America	89,668	71,204
Asia	18,353	7,278
Africa	3,971	2,246
Total	185,807	198,731

Most significant countries

	2022	2021
	Pre-tax profit	Pre-tax profit
Spain	-315	29,888
France	-3,627	16,215
Italy	28,468	33,120
United States	87,087	72,318
United Kingdom	32,665	20,974

Public grants received

EUR thousand

	2022	2021
Capital grants received	1,026	1,591
Operating grants received	2,509	490

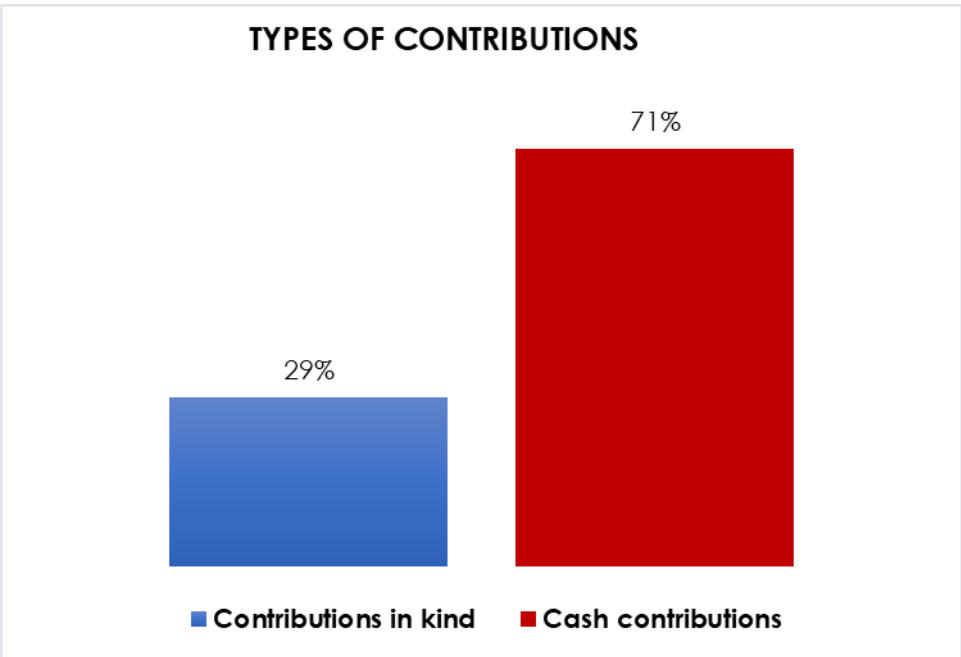
COMMITMENT TO THE DEVELOPMENT OF LOCAL COMMUNITIES

One of the main pillars of social responsibility action within the Ebro Group is ensuring the well-being and socio-economic development of the local communities directly related with our business activities.

During 2022, as in previous years, the Ebro Foundation and the Group participated in projects created by different not-for-profit organisations and promoted and developed *motu proprio* several initiatives of social and environmental interest.

Within this context, the global amount spent on social action during 2022 was EUR 4.9 million.

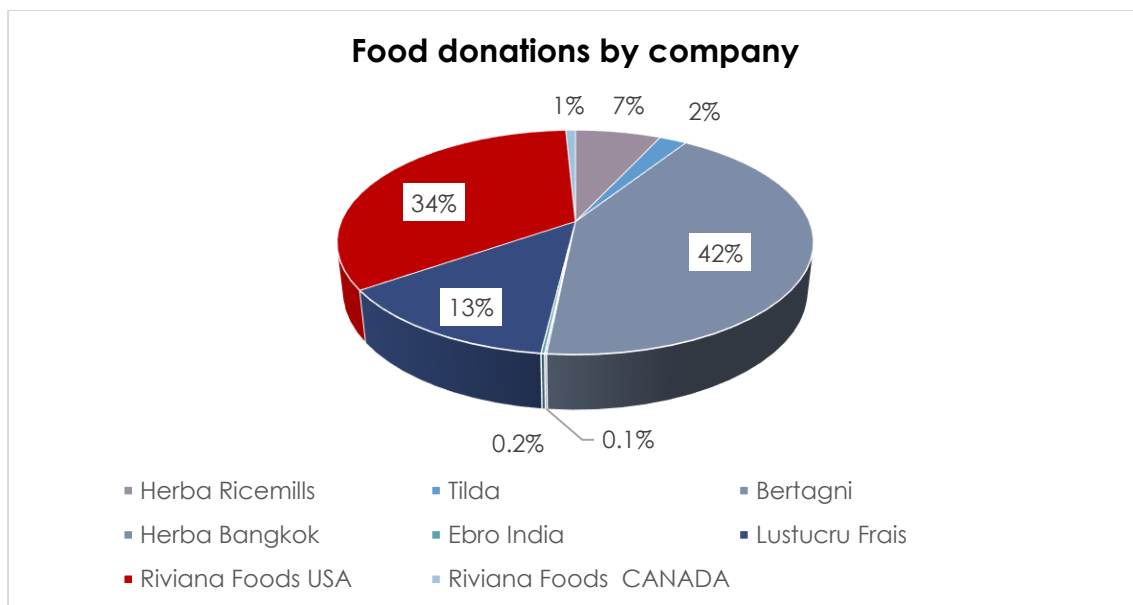
Social Action	Amount (EUR)
Food donations subsidiaries	1,415,232.06
Ebro Foundation activities	601,459.37
Sustainable Agriculture	2,916,070.00
TOTAL	4,932,761.43



Food Donations

During 2022, Group companies in Spain, United Kingdom, Italy, France, Thailand, India, United States and Canada made food donations for an aggregate value of EUR 1.4 million, delivering almost 600 thousand kilogrammes of food.

Company	Amount (EUR)
Herba Ricemills	98,104.62
Tilda	31,552.60
Bertagni	600,732.00
Herba Bangkok	1,493.15
Ebro India	2,832.49
Lustucru	190,379.00
Riviana Foods USA	479,026.95
Riviana Foods Canada	11,111.25
TOTAL	1,415,232.06



Social and Environmental Initiatives

Apart from the food donations and in their determination to contribute to sustainable development of the communities in which we operate, the Ebro Group and the Foundation continued working in 2022 to set up social and environmental initiatives:

The Foundation worked in four major areas during 2022:

1. **Food and health:** Participation in programmes that combine food and health, food and social development, and food and sport.

The total investment made in this area in 2022 was EUR 58,070.57.

2. **Social welfare:** This working area comprises support for education through scholarships, research projects, educational programmes that contribute towards equal

opportunities, training projects for integration into society and employment, entrepreneurship and job promotion initiatives, and community aid programmes that contribute to achieving the full, effective social integration of these individuals and groups at risk of exclusion.

The total investment made in this area in 2022 was EUR 379,011.80.

- 3. Environmental sustainability:** Environmental conservation is another essential aspect within the work of the Ebro Foundation. The Foundation supports the sustainable agriculture strategy put into practice by the Ebro Group and works on promoting and achieving the Group's sustainability goals through the *EBRO FOUNDATION SUSTAINABILITY & ENVIRONMENTAL AWARDS*, which aim to bring out the talent of the Group's professionals in the search for innovative solutions that contribute towards achievement of the goals contemplated in our sustainability plan *HEADING FOR 2030*.

With regard to sustainable agriculture, the Foundation continued in 2022 to promote EKTA, a programme intended to implement crop standards that are sustainable from a social and environmental perspective in India.

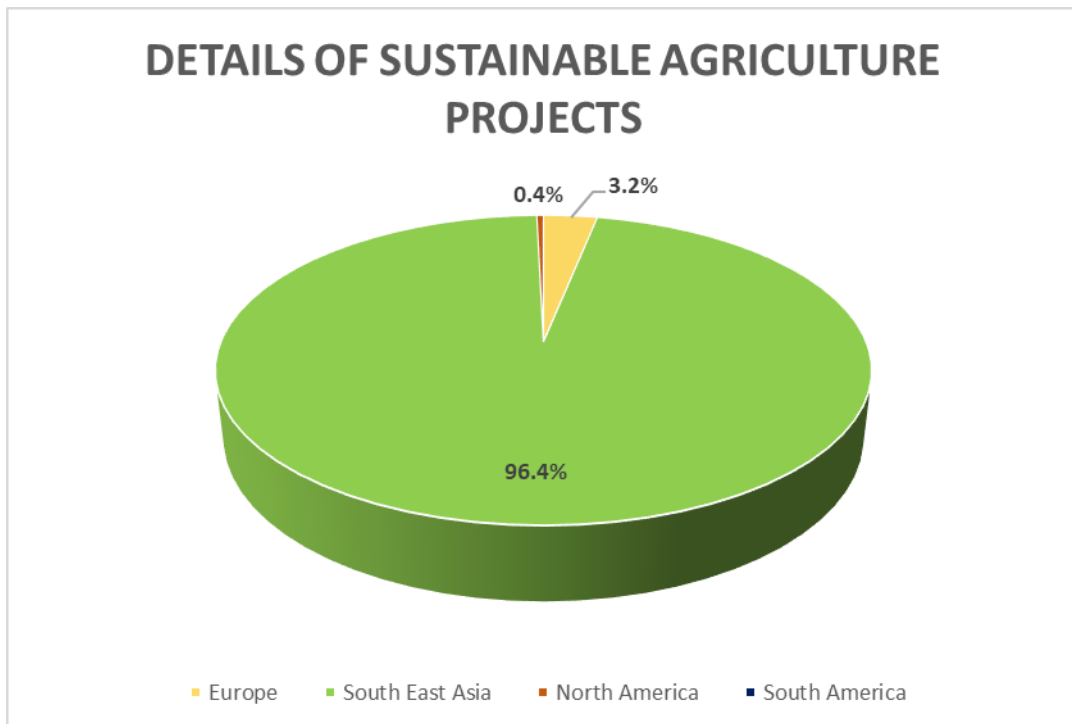
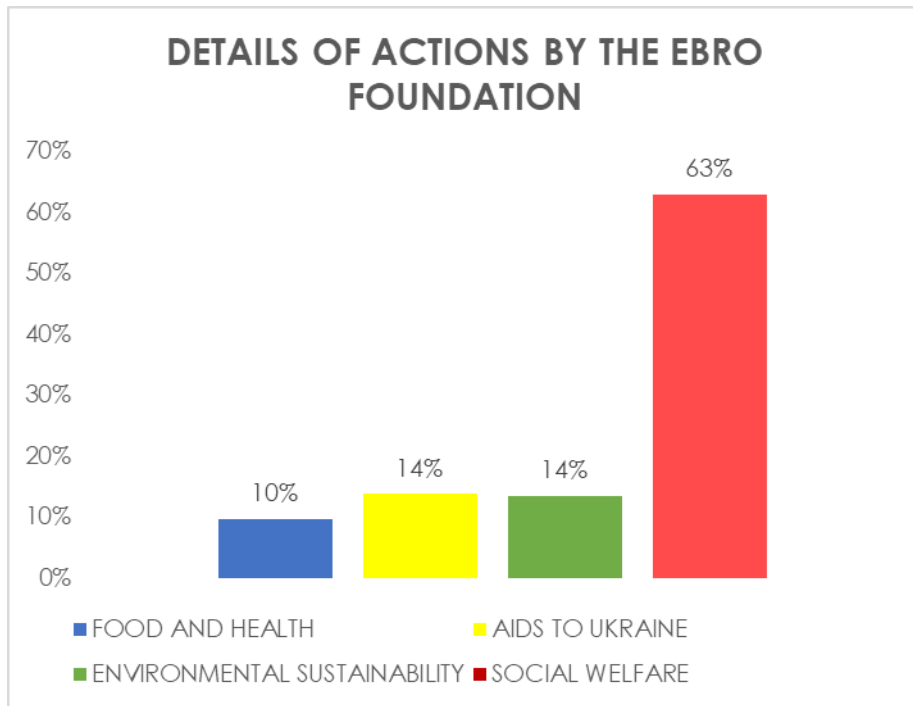
The Foundation invested EUR 81,334 in this area, supplemented by the EUR 2,916,070 invested by several Group companies, both to set up sustainable agriculture programmes in our principal sourcing areas and to pay a fee premium to growers with a view to improving not only their agricultural yields, but also their income.

- 4. Aids to Ukraine:** During 2022, in an effort to alleviate the severe humanitarian crisis in Ukraine since the Russian invasion, the Ebro Foundation joined the wave of solidarity with the Ukrainian people by sending essential goods, donations in kind and financial contributions.

Within food donations and thanks to the support of our Belgian subsidiary Ebro Foods Belgium, the Foundation collaborated with *World Central Kitchen (WCK)*, the NGO of chef José Andrés, sending more than 80,000 kg of rice for the Ukrainian refugees in Lviv (Ukraine). Lorries loaded with rice set off from Ebro Foods Belgium for the Polish border with Ukraine, and once there WCK volunteers crossed the border with the rice and delivered it to Lviv.

Through the association Madrid Futuro, the Foundation also participated financially in the emergency campaign "Cáritas with Ukraine", which had three goals: distribute essential goods, provide transport and safe refuge for the Ukrainians who managed to leave the country and help the refugees who arrived in Spain. Also through Madrid Futuro, the employees at our Madrid office collaborated in the campaign for collecting warm clothes for women and children, baby food, medicines, etc. organised by Madrid City Council.

The aids in this area totalled more than EUR 83,000.



NB: Information on all our sustainable agriculture projects is set out in the chapter "Commitment to the Environment" in this Report.

To conclude this chapter, it should be mentioned that the Ebro Group has not received any complaints or claims regarding possible adverse impacts on the local communities in the areas in which we operate.

8. OUR PROFESSIONALS

People, their personal well-being and their professional development, are one of the prime targets of the Ebro Group in Social Responsibility.

Scope of the reporting perimeter

As a result of the divestment in Roland Montserrat in the first half of 2022 and in order to enable adequate comparison of the information corresponding to 2021 and 2022, all the 2021 indicators have been recalculated to eliminate the information corresponding to that company. On the other hand, the indicators corresponding to the company InHarvest, acquired in February 2022, were included in 2022.

Management focus

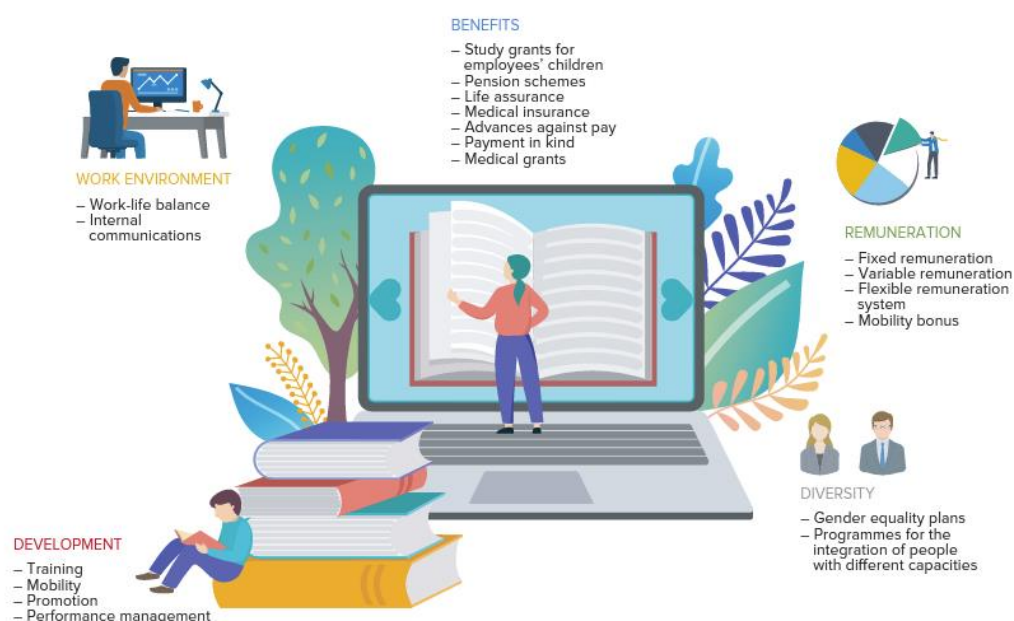
The most valuable asset of the Ebro Group is its **6,414 professionals, of whom 5,412 are employed directly by the company and 1,002 are contracted** through different external agencies. A very close-knit team of professionals with enormous talent potential aligned with the organisation's strategy. Through the human resources departments of the different subsidiaries, the Ebro Group endeavours to motivate these professionals by offering a high quality job while at the same time strengthening their skills, powers and personal and professional leadership.

The Ebro Group's personnel management policy is designed to secure a high level of knowledge and contact with the workforce through a decentralised structure formed by the human resources managers in all the major companies of the Group and the implementation of bespoke policies in each one (in addition to the provisions of labour laws), taking account of the specific features of the countries in which they operate. These policies also include general guidelines regulating company/employee relationships, specific guidelines on Occupational Health & Safety, Training & Education, Diversity and Equal Opportunities and Equal Pay for Men and Women. Companies with a small personnel structure (essentially commercial companies with fewer than 10 employees) are governed exclusively by the labour laws in place in the countries in which they operate.

Above all of them and without prejudice to the provisions of the specific policies mentioned above, the Ebro Group has a Code of Conduct, which not only secures ethical, responsible conduct by the professionals in all the subsidiaries of the Ebro Group in the performance of their duties, but also serves as a reference to define the minimum objectives of the employment policy and guarantees, namely:

1. Occupational health and safety
2. Training and career development of all employees
3. Non-discrimination, diversity and equal opportunities in access to employment (including gender equality, the integration of people with different abilities and promotion of a multi-cultural workforce)
4. Right to form and join unions
5. Compliance with collective rights

In view of the contents of the different programmes launched by the most important business units in the Ebro Group, the management of Human Resources of the Ebro Group can be grouped into five pillars, indicating the different working areas within each one, for each company of the Ebro Group.



A. EMPLOYMENT

Total number and distribution of employees by gender

	2022		2021	
	No. employees	% total employees	No. employees	% total employees
Men	3,848	71.10%	3,549	70.99%
Women	1,564	28.90%	1,450	29.01%
Total employees	5,412		4,999	

NB: The gap between men and women is largely due to the nature of the Group, which is predominantly factory-based, as factory work has traditionally been done by men. Almost 71% of the personnel employed within the Ebro Group overall are men, 78% of whom are factory employees.

Breakdown of employees by age group

Age Group	2022		2021	
	No. employees	% total employees	No. employees	% total employees
<=30	861	15.91%	733	14.66%
30 - 50	2,764	51.07%	2,607	52.15%
>= 50	1,787	33.02%	1,659	33.19%
Total employees	5,412		4,999	

Breakdown of employees by country

Country	2022		2021	
	No. employees	% total employees	No. employees	% total employees
Argentina	170	3.14%	157	3.14%
Belgium	220	4.07%	217	4.34%
Cambodia	15	0.28%	12	0.24%
Canada	237	4.38%	223	4.46%
Denmark	61	1.13%	53	1.06%
France	571	10.55%	522	10.44%
Germany	167	3.09%	161	3.22%
Hungary	5	0.09%	4	0.08%
India	179	3.31%	175	3.50%
Italy	780	14.41%	744	14.88%
Morocco	254	4.69%	209	4.18%
Netherlands	80	1.48%	81	1.62%
Portugal	72	1.33%	69	1.38%
Spain	934	17.26%	864	17.28%
Thailand	194	3.58%	198	3.96%
United Kingdom	430	7.95%	391	7.82%
United States	1,043	19.27%	919	18.38%
Total employees	5,412		4,999	

Breakdown of employees by professional category

Professional category	2022		2021	
	No. employees	% total employees	No. employees	% total employees
Executives	317	5.86%	253	5.06%
Technical staff & middle management	852	15.74%	874	17.48%
Administrative & auxiliary staff	835	15.43%	798	15.96%
Factory employees	3,346	61.83%	3,007	60.15%
Others	62	1.15%	67	1.34%
Total employees	5,412		4,999	

Total number of employment contracts and breakdown by type

This table shows the total number of contracts at 31 December 2022:

Type of contract	2022	2021
Permanent	3,750	3,512
At Will	1,258	1,157
Temporary	356	353
Total number of contracts	5,364	5,022

NB: The At-Will contracts are the form of employment contract most commonly used in the USA, and corresponds to our company Riviana Foods.

Annual average contracts by gender

The At-Will contracts are included in permanent contracts, and the average number of part-time contracts is included in the average number of permanent and temporary contracts.

Average contracts	2022			2021		
	Men	Women	Total	Men	Women	Total
Permanent	3,502	1,439	4,941	3,322	1,339	4,661
Temporary	328	140	468	272	117	389
Part-time	90	107	197	90	101	191

Annual average contracts by age group

The At-Will contracts are included in permanent contracts, and the average number of part-time contracts is included in the average number of permanent and temporary contracts.

Average contracts	2022				2021			
	<= 30	30-50	>= 50	Total	<= 30	30-50	>= 50	Total
Permanent	681	2,549	1,711	4,941	648	2,442	1,571	4,661
Temporary	173	215	80	468	116	188	85	389
Part-time	36	69	92	197	38	46	107	191

Annual average contracts by professional category

The At-Will contracts are included in permanent contracts. This average includes both full-time and part-time permanent contracts.

Professional category	2022	2021
Executives	301	252
Technical staff & middle management	849	864
Administrative & auxiliary staff	803	762
Factory employees	2,934	2,722
Others	54	61
Average permanent contracts	4,941	4,661

This table includes the average full-time and part-time temporary contracts.

Professional category	2022	2021
Executives	14	1
Technical staff & middle management	5	8
Administrative & auxiliary staff	60	58
Factory employees	375	303
Others	14	19
Average temporary contracts	468	389

NB: The increase in temporary contracts in 2022 over 2021 is due to the contracting of more temporary staff by Agromeruan for the agricultural campaign and the hiring of new executive staff in Lustucru Frais after restructuring the workforce following the divestment of Panzani.

The average includes both permanent and temporary part-time contracts.

Professional category	2022	2021
Executives	6	5
Technical staff & middle management	13	22
Administrative & auxiliary staff	70	61
Factory employees	89	85
Others	19	18
Average part-time contracts	197	191

Number of dismissals by gender, age and professional category

Professional category	2022							2021						
	Men			Women			TOTAL	Men			Women			TOTAL
	<= 30	30 - 50	>= 50	<= 30	30 - 50	>= 50		<= 30	30 - 50	>= 50	<= 30	30 - 50	>= 50	
Executives	1	1	8	3	2	1	16	0	2	4	0	0	0	6
Technical staff & middle management	4	9	9	6	9	8	45	4	5	8	2	3	2	24
Administrative & auxiliary staff	8	3	1	4	3	7	26	4	3	2	1	4	2	16
Factory employees	66	110	34	22	59	21	312	42	64	30	20	33	10	199
Others	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Number of dismissals	79	123	52	35	73	37	399	50	74	44	23	40	14	245

NB: The higher number of dismissals in 2022 over 2021 corresponds to the greater staff turnover in the United States as a result of the full employment situation in the country and the workforce restructuring in Lustucru Frais following the divestment of Panzani.

B. ORGANISATION OF WORK

Organisation of working time

The organisation of working time varies in the different countries in which the Group companies operate. Working hours may thus vary between 35 and 48 hours a week, distributed over 5 or 6 days a week. The total weeks worked a year ranges between 44 and 52, depending on the production facilities.

Absenteeism

The employees of Group companies were absent for a total 353,441 hours in 2022, 3.62% more than in the previous year, when absenteeism totalled 341,102 hours.

These hours of absenteeism include grounds such as injury, occupational disease, sick leave and doctor's appointments, etc. However, they exclude authorised absence such as for parental, holiday, study leave, etc.

Welfare benefits for employees

The following table shows, by company, the benefits provided for employees:

Company	Welfare benefits	Type of employee
Agromeruan	Parental leave	All employees

Company	Welfare benefits	Type of employee
	Disability/invalidity cover	
	Medical insurance	Full-time employees
Arrozeiras Mundiarroz	Parental leave	All employees
	Disability/invalidity cover	
	Medical insurance	Full-time employees
Bertagni	Parental leave Disability/invalidity cover Fuel cards Life insurance Medical insurance Shopping vouchers	All employees
Ebro Foods	Parental leave Disability/invalidity cover Education grant for children of working person	All employees
Ebro Foods Belgium	Parental leave	All employees
	Pension fund	
	Life insurance	
	Medical insurance	
Ebro Foods Netherlands	ASR insurance Parental leave Disability/invalidity cover Pension fund UWV	All employees
Ebro India	Parental leave	All employees
	Pension fund	
	Life insurance	

Company	Welfare benefits	Type of employee
	Medical insurance	
Ebro Ingredients	AG Parental leave DKV Pension fund Life insurance Medical insurance	All employees
Garofalo	Parental leave	All employees
	Disability/invalidity cover	
	Pension fund	
	Life insurance	
	Medical insurance	
Geovita	Food Healthcare Fund	All employees
Herba Bangkok	Parental leave	All employees
	Pension fund	Full-time employees
	Disability/invalidity cover	
	Life insurance	
	Medical insurance	
	Social welfare	
Herba Ricemills	Shares	All employees
	Parental leave	
	Disability/invalidity cover	
	Life insurance	
	Medical insurance	

Company	Welfare benefits	Type of employee
Indo European Foods	Parental leave	All employees
	Medical insurance	
La Loma Alimentos	Shares	All employees
	Parental leave	
	Disability/invalidity cover	
	Pension fund	
	Life insurance	
	Medical insurance	
Lustucru Frais	Parental leave	All employees
	Disability/invalidity cover	
	Pension fund	
	Life insurance	
	Medical insurance	
Mundi Riso	Parental leave	All employees
	Disability/invalidity cover	
	Pension fund	
	Life insurance	
	Medical insurance	
	Welfare Bit	
Mundi Riz	Parental leave	All employees
	Disability/invalidity cover	Full-time employees
	Medical insurance	
Riviana Foods	Parental leave	Full-time employees
	Disability/invalidity cover	
	Life insurance	

Company	Welfare benefits	Type of employee
	Medical insurance	All employees
	Pension fund	
Riviana Foods Canada	Parental leave	Full-time employees
	Disability/invalidity cover	
	Pension fund	
	Life insurance	
	Medical insurance	
S&B Herba Foods	Parental leave	All employees
	Psychological assistance	
	Disability/invalidity cover	
	Pension fund	Full-time employees
	Life insurance	
	Medical insurance	
Tilda	Annual flu jab	All employees
	Parental leave	
	Meal vouchers	
	Vouchers for eye specialist	
	Medical grants	
	Life insurance	
	Medical insurance	Full-time employees
Transimpex	Parental leave	All employees

NB: "All employees" includes both full-time and part-time employees.

Work-life balance

The Group continues working on the implementation of measures that give our professionals greater flexibility to cope with different times and circumstances in their lives, such as parenthood, childcare, care of elderly relatives, personal concerns related with volunteer activities, furthering their training, etc.

One of the company's most prominent flexibility measures is homeworking, which in some cases follows a regulated procedure and in others it forms part of the flexibility offered by the different companies to work remotely on specific days when the professionals need to be at home. In the same context, most of the businesses have introduced flexi-time to enable their employees to strike a better balance between their personal and professional lives.

Moreover, within its commitment to employees' work-life balance, the parent of the Group has established a protocol for digital disconnection so that its employees do not work outside their stipulated working times. This protocol will be reviewed and updated regularly in the event of any change in the organisation and/or activity of the company and in response to any suggestions or proposals for improvement received from our professionals.

Employees homeworking with a regulated procedure

Professional category	2022			2021		
	Men	Women	Total	Men	Women	Total
Executives	92	68	160	51	28	79
Technical staff & middle management	61	55	116	107	86	193
Administrative & auxiliary staff	46	87	133	88	113	201
Factory employees	2	3	5	2	1	3
Others	1	0	1	0	0	0
Total employees homeworking	202	213	415	248	228	476

Parental leave

	2022			2021		
	Men	Women	Total	Men	Women	Total
Employees who took leave / employees entitled to leave (%)	97.78%	100.00%	98.77%	98.65%	100.00%	99.29%

C. HEALTH AND SAFETY

All the Group companies and their respective production plants have an Occupational Hazard Prevention and Management System in place. This system is implemented using both internal resources and external firms. In addition, 85.83% of the workforce is represented on the Health and Safety Committees in the different companies (87.21% in 2021).

Health and safety aspects covered in formal agreements with unions

The health and safety aspects covered by formal agreements with unions are:

- ✚ Global agreements: in accordance with ILO principles, organisational structures for problem-solving, commitments regarding target performance or the level of practice to apply.

- ✚ Local agreements: personal protection equipment, mixed health and safety committees, participation of workers' representatives in health and safety audits, inspections and investigations, training and education and right to refuse unsafe work.

Workplace safety

All our employees are covered for Occupational Hazard Prevention.

The following figures correspond to employees on the Group's payroll:

	2022		2021	
	Men	Women	Men	Women
No. lost-day injuries	137	47	100	19
Frequency rate	21.21	18.05	17.23	9.69
Severity rate	0.88	0.81	0.64	0.52
No. employees with occupational disease	1	2	2	3

NB:

- (i) The rates were calculated using the following formulas:
- Frequency rate = (total no. lost time injuries/total no. hours worked) x1000000
 - Severity rate = (no. lost days due to injury/total no. hours worked) x1000
- (ii) Occupational disease is work-related ill health.

One fatal accident occurred in the company La Loma Alimentos (Argentina) during 2022.

There are no jobs within the Group with a high risk of occupational disease.

D. LABOUR RELATIONS

Employees covered by collective bargaining agreements

63.58% of the employees of the Ebro Group are covered by the collective bargaining agreements of their respective business areas or another kind of collective agreement, compared with 62.11% in the previous year.

The remainder are top executives of the Group, the professionals of the North American and Anglo Saxon companies (as such agreements have not been used there for over 20 years), those of Herba Bangkok, Herba Cambodia, Mundiriz, Agromeruan and Ebro India (where this type of agreement is not used either) and those of Riceland Magyarorzag, since it has fewer employees than the number required by local law for these collective agreements. In those cases, all the professionals are protected by the national labour laws in place in their respective countries, their respective personnel policies and the guidelines of the Ebro Group's Code of Conduct. Furthermore, external ethical audits are conducted regularly in some of them.

Country	2022	2021
Argentina	78.24%	64.33%
Belgium	100%	100%
Cambodia	0%	0%
Canada	74.26%	65.92%
Denmark	100%	100%
France	100%	100%
Germany	0%	0%

Country	2022	2021
Hungary	0%	0%
India	0%	0%
Italy	100%	100%
Morocco	0%	0%
Netherlands	100%	100%
Portugal	100%	100%
Spain	100%	100%
Thailand	0%	0%
United Kingdom	5.58%	9.97%
United States	37.39%	40.48%

E. TRAINING

One of the main goals of the Ebro Group in respect of human resources is to encourage employees to develop their skills and abilities, offering training to give them the technical qualifications they need, both to perform their duties and for their professional promotion.

This commitment is set out in section IV, point 11 of the Group's Code of Conduct.

During 2022, 136,230 hours of training were given, 15% more than in the previous year, with the participation of 73% of our employees.

Total hours training of our employees by professional category

	2022			2021		
	Men	Women	Total	Men	Women	Total
Executives	2,343	1,441	3,784	1,520	957	2,477
Technical staff & middle management	9,344	3,072	12,417	11,274	4,334	15,607
Administrative & auxiliary staff	3,231	3,580	6,812	3,189	3,138	6,327
Factory employees	82,856	29,497	112,353	70,698	23,271	93,969
Others	618	248	866	214	150	364
Total hours training	98,392	37,838	136,230	86,895	31,849	118,744

F. DIVERSITY AND EQUAL OPPORTUNITIES

The Ebro Foods Code of Conduct specifies in section IV, point 9.5 that the Group promotes and upholds the principle of equal treatment and equal opportunities for all its professionals, regardless of their race, colour, nationality, ethnic origin, religion, gender, political or sexual inclination, civil status, age, disability or family responsibilities, as a principle behind all human resources policies and applicable in the recruitment of professionals, training, career opportunities, pay levels and all other aspects of relationships with professionals.

With the aim of strengthening this commitment, some of the Group companies have drawn up additional policies that specifically build on the guidelines established in the corporate Code of Conduct. For example, the subsidiaries Riviana Foods and S&B Herba Foods have a Policy for Equal Opportunities in Employment, and Ebro India has an Anti-Discrimination Policy.

Similarly, during 2022 the parent, Ebro Foods, finished preparing an Equality Plan defining the framework for adequate action to promote effective gender equality. The Plan has been sent to the competent State Labour Authority for registration, filing and publication and at the date hereof we are pending completion of that formality by the Authority. In the same context, the Negotiating Committee for the Ebro Foods, S.A. Equality Plan also drew up the Ebro Foods Protocol for Sexual and Gender-Based Harassment, which was approved by Company Management on 9 January 2023.

We also have the Ebro Foods Policy on the Selection of Directors and Diversity in the Composition of the Board of Directors, which lays down specifically and verifiably the basic principles and criteria that must be followed in the selection of candidates to sit on the company's Board of Directors and to ensure diversity in the composition of the Board.

Diversity in governing bodies and workforce

Board of Directors	2022		2021	
	Number	% of total	Number	% of total
Men	9	64.29%	8	57.14%
Women	5	35.71%	6	42.86%

	2022		2021	
	No. employees	% total employees	No. employees	% total employees
Men	3,848	71.10%	3,549	70.99%
Women	1,564	28.90%	1,450	29.01%
Total employees	5,412		4,999	

Employees with different abilities

2022		2021	
Men	Women	Men	Women
67	31	58	28

During 2022, several actions were taken in Spain to promote the socio-occupational integration of persons with different abilities, through the contracting of certain services with special employment centres (CEE).

Centre	Services	Amount (€)
C.E.E. CADEMADRID	Printing	1,948
C.E.E. INSERCIÓN PERSONAL DISCAPACITADOS "IPD"	Cleaning head office in Madrid	81,326
	TOTAL	83,275

With regard to the universal accessibility and integration of persons with different abilities in physical environments, examples of measures taken by some Group companies included: (i)

making the necessary adaptations to eliminate architectural barriers, (ii) applying ergonomic principles to adapt work stations to the person, and (iii) limiting certain tasks, and constantly reducing and reviewing their workload.

Remunerations

The basic salary is identical for men and women in all the companies of the Ebro Group.

Average remuneration by professional category

Professional category	2022			2021		
	Men	Women	Average	Men	Women	Average
Executives	105,423	83,353	94,388	107,902	85,266	96,584
Technical staff & middle management	60,094	50,379	55,236	50,130	51,459	50,795
Administrative & auxiliary staff	37,618	32,128	34,873	43,933	38,086	41,010
Factory employees	28,064	24,560	26,312	28,312	25,313	26,812
Others	31,306	31,195	31,251	22,828	22,631	22,730

NB:

(i) The calculation of this average remuneration is based on the average annual gross salaries of the employees (men and women) in each category.

The gross salary includes the sum of the basic salary plus bonuses, such as seniority, cash bonuses and bonuses in kind (e.g. shares), overtime and any other work-related benefit, such as transport, housing benefits, child benefits, etc.

(ii) The remuneration of the Senior Management is included in the information reported for the professional category "Executives".

Average remuneration by age group

2022			2021		
<= 30	30 - 50	>= 50	<= 30	30 - 50	>= 50
34,357	52,392	58,486	30,726	50,941	61,091

NB:

(i) The calculation of this average remuneration is based on the average annual gross salaries of the employees (men and women) in each age group.

Average remuneration by gender and pay gap

2022			2021		
Men	Women	Pay gap	Men	Women	Pay gap
52,501	44,323	0.16	50,621	44,551	0.12

NB:

(i) The calculation of this average remuneration is based on the average annual gross salaries of the employees, which include the basic salary plus bonuses, such as seniority, cash bonuses and any other welfare benefit.

(ii) The pay gap was calculated using the following formula: (average remuneration men - average remuneration women) / average remuneration men.

 Average remuneration of directors, by gender

	2022		2021	
	Men (2)	Women (1)	Men	Women
Average remuneration directors (EUR thousand)	252	178	267	172

* NB:

(1) On 24 March 2022, the proprietary director and reference shareholder Alimentos y Aceites, S.A. (SEPI) (represented by a woman) stepped down from the Board with effect from 29 March 2022, taking the number of female directors on the Board from 6 at the beginning of the year to 5 at the end. For this reason, the remuneration of the female representative of Alycesa (EUR 23 thousand) has not been taken into account when calculating the annual average remuneration for the 5 female directors in the period 1/1/2022 - 31/12/2022.

(2) On 30 March 2022, the Board resolved to appoint Jordi Xuclà Costa director by the procedure of cooptation, to fill the vacancy produced by the resignation of Alimentos y Aceites, S.A. (SEPI). Mr Xuclà Costa is classified as proprietary director of Alimentos y Aceites, S.A. At the Annual General Meeting held on 29 June 2022, the Shareholders resolved to ratify the appointment by cooptation of Jordi Xuclà Costa. Mr Xuclà Costa was appointed for a term in office equal to the remaining term for which Alimentos y Aceites, S.A. had been appointed (Alimentos y Aceites, S.A. was appointed director at the Extraordinary General Meeting of 16 December 2020 for the statutory term of 4 years).

On 31 January 2022, the Board resolved to appoint Marc Thomas Murtra Millar director by the procedure of cooptation, to fill the vacancy produced by the resignation of Mr Zorrero Camas (31/12/2021). Mr Murtra Millar was also appointed member of the Executive Committee and the Audit, Control and Sustainability Committee.

(3) The 2022 remuneration of directors for their duties as such was taken, excluding the remuneration received by the Executive Chairman for his executive duties. The Chairman is the only executive director who performs executive duties and receives remuneration for them. The directors' remuneration for their duties as such is stated individually for each one in the Annual Report on Directors' Remuneration 2022, published on the website of the CNMV (www.cnmv.es) and the corporate website (www.ebrofoods.es). The remuneration of directors for their duties as such is established with no consideration for the gender of the person holding office.

9. CUSTOMERS AND CONSUMERS

Customers and consumers are two of the driving forces for development, evolution and growth of the company. The Ebro Group uses a wide variety of tools to:

1. Offer them a broad portfolio of healthy, differentiated products.
2. Anticipate and meet their needs for consumption.
3. Guarantee top quality in its products and services, meeting not only the quality standards and requirements stipulated in law, but also any stricter standards to guarantee that top quality.
4. Watch out for their health and safety, meeting the strictest food safety standards.

Our main tools

1. R&D and innovation

This is what distinguishes us from our rivals, enabling us to develop unique products and technologies to meet the needs of our customers and consumers and provide them with a differentiated range of products delivering value added.

2. Quality Control and Food Safety Systems

- i. **Good Manufacturing Practices (GMP):** contemplating good practices for the handling, packaging, storage and carriage of fresh products.
- ii. **Hazard Analysis and Critical Control Point (HACCP):** a system for identification and control of any problems that may come to light during the design and production processes.
- iii. **Quality Assurance Standards, such as:**
 - The standards established by the International Organisation for Standardization (ISO 9001:2000, ISO 9001:2008 and ISO 22000).
 - The International Food Standards (IFS), which, structured in line with ISO 9001:2000, are among the highest distinctions in Food Safety in all distribution sectors in Europe.
 - The BRC (British Retail Consortium) certification, one of the internationally most widespread models for distributors and large retail outlets to rate their brand product suppliers.
 - The standards FSSC22000, which provides a reference framework for the food safety requirements, incorporating good practices in the agricultural, manufacturing and distribution systems for HACCP.

In this context, all the Ebro Group plants have been certified for quality and food safety, having a total of 198 certifications (Annex 2).

During 2022, Ebro Foods Netherlands BV, Ebro Frost UK, Pastificio Lucio Garofalo, Indo European, Lustucru Frais and Riviana Foods made regular assessments of their products with a view to reinforcing safety and improving them.

Product and Service Labelling

All our companies comply with the national laws and regulations applicable in each country.

Customer and consumer services

Information on the nutritional properties of all Ebro Group products is provided on the packaging, along with the physical address of the company and, where appropriate, its website, e-mail and telephone number.

The different customer services departments collect information and, in turn, generate information for the quality system. Grievances are answered by telephone or e-mail, according to the details given by the customer. A case file is opened for each incident and reported internally to the Quality Department, which carries out internal checks and monitoring of the relevant quality system in case there is a fault and, if so, takes the necessary measures to offer a solution.

As a rule, the companies follow up all grievances by telephone to check consumer satisfaction.

Statistical monitoring is regularly conducted of all incidents and proposals for improvement made by consumers, which are discussed at the different Management Committee meetings held every month within each company.

The communication channels used with consumers in the different companies are indicated below:

Company	Country	Communication channels with customers
Arrozeiras Mundiarroz	Portugal	E-mail, post, website and social media
Bertagni 1882	Italy	E-mail, website and social media
Boost Nutrition	Belgium	E-mail, website and social media
Ebro Foods Netherland BV (Lassie)	Netherlands	Telephone, e-mail, website and social media
Ebro India	India	Telephone, e-mail, website and social media
Euryza	Germany	Telephone, e-mail, website and social media
Herba Ricemills	Spain	Telephone and e-mail
Lustucru Frais	France	Telephone and post
Lustucru Riz	France	Telephone, post, e-mail and social media
Pastificio Lucio Garofalo	Italy	Telephone, e-mail, website and social media
Riceland Magyarorszag	Hungary	Telephone, e-mail and website
Risella	Finland	Telephone
Riviana Foods Canada	Canada	Telephone, e-mail, website and social media
Riviana Foods USA	United States	Telephone, e-mail, Website and social media
Tilda	United Kingdom	Telephone, e-mail, post and social networks

Incidents during the year

Incidents registered with large customers

Overall, 8 incidents were registered in 2022, 1 of which corresponded to Arrozeiras Mundiarroz (Portugal), 2 to Bertagni (Italy), 2 to Ebro Ingredients (Netherlands) and 3 to Indo European Foods (United Kingdom). Of those, 5 were related with product health and safety and 3 to information and labelling.

Claims from end consumers

The following table shows the number of claims (packaging defects, requests for information, sensory properties, etc.) handled during 2022, by company.

Company	No. incidents 2022	No. incidents 2021
Arrozeiras Mundiarroz	243	149
Bertagni 1882	348	318
Ebro Foods Belgium	236	228
Ebro Foods Netherland	181	241
Ebro India	48	78
Euryza	726	930
Herba Ricemills	250	340
Lustucru Frais	1,344	1,413
Lustucru Riz	1,509	1,151
Pastificio Lucio Garofalo	506	677
Riceland Magyarorszag	35	45
Risella	151	187
Riviana Foods	15,489	7,903
Riviana Foods Canada	1,501	1,663
Tilda	1,122	1,144

No claims were received in 2022 in any Group company related with privacy and customers' personal data leaks.

Promotion of healthy food and healthy lifestyles

Within our undertaking to encourage and promote healthy eating, all the brands of the Ebro Group include product categories targeting health, such as ancient grains, gluten free, quinoa, whole grain, etc., focusing increasingly on everything to do with healthy, organic and natural foods.

In addition, the Ebro Group has the blog [Sentirsebien.es](https://www.sentirsebien.es) (.es) [lit.: 'when you feel good, it shows'], an informative space in which nutritionists, researchers and professionals of the sector post articles, recipes and advice for the public promoting healthy eating habits and maintaining an active lifestyle.

10. SUPPLIER MANAGEMENT

Description of the supply chain

The suppliers of the Ebro Group are classified into four categories:

1. Rice or durum wheat suppliers
2. Other raw material suppliers
3. Packaging suppliers
4. Service providers

Supplier management model

As the Group has decentralised certain management areas, such as the Procurements Area, to its respective companies, each subsidiary has in the past had its own procurement policies and criteria, in keeping with the laws and characteristics of the countries in which they operate. Above them all, the Supplier Code of Conduct of Ebro Foods regulates the minimum criteria and rules of conduct in labour and environmental aspects that must be met by the Group's suppliers.

With a view to establishing globally the integral management of the supply chain, in 2019 we embarked on a work plan to: 1) make sure that all our suppliers comply with the Group's Supplier Code of Conduct and 2) require them to complete a questionnaire on ethics. The replies to this questionnaire enable us to identify the critical issues and risks we need to address in order to guarantee the sustainability of our supply chain, designing, together with our companies, a roadmap to achieve the goal set in our Global Sustainability Plan HEADING FOR 2030, that 100% of our suppliers and service providers will have signed the Group's Supplier Code of Conduct (COC) or incorporated ESG criteria in their policies.

In addition, have another two corporate tools we can use to guarantee the sustainability of our supply chain: 1) visits and meetings of the Procurement Departments of the different subsidiaries with their suppliers, and 2) our corporate account in the Sedex Platform, with which all the Group companies are now registered and their respective suppliers are signing up, in turn being audited by an independent external firm.

Supply Chain

In 2022 we mapped our global supply chain, with the following proportions per continent:

- Europe, 68%
- Africa, 10%
- Asia, 8%
- North America, 8%
- South America, 6%

Regarding the percentage of suppliers who have signed the Ebro Group's Supplier Code of Conduct, the headway made in 2022 was as follows:

- 54% in Asia
- 17% in South America
- 11% in Europe
- 8% in North America

In the area of agricultural raw materials, more specifically in rice production, Ebro India, Herba Bangkok, Herba Ricemills, La Loma Alimentos, Munderiso and Riviana are, together with their agricultural suppliers, developing different sustainability programmes to assess and verify the sustainability of the crop using the FSA standard of the Sustainable Agriculture Initiative Platform (SAI Platform) and the SRP standard of the Sustainable Rice Platform, as well as the Ecological Agriculture Platform and Fair Trade. All these programmes together have produced a positive impact on approximately 9,000 growers who supply the Ebro Group.

At this point, we also highlight the sustainable agriculture projects we are developing in some of our principal sourcing areas, the main goals of which are: (i) improve growers' revenues, (ii) optimise their agricultural returns, (iii) mitigate climate change by reducing the use of water, (iv) cut emissions and (v) encourage the use of biological means to combat plagues. Our global investment in all these projects was EUR 2.9 million.

** We duly report on all these programmes in Chapter 11 of this Report, Commitment to the Environment.*

Audits made on our supply chain

We made 54 SMETA audits in 2022, 6 of them follow-up audits, on suppliers in the following countries:

Country	Date of audit	Auditors
Argentina	13/07/2022	Bureau Veritas Certification
	14/07/2022	
	16/07/2022	
Belgium	19/09/2022	Intertek France
	25/01/2022	SGS CBE Belgium
Cambodia	19/08/2022	SGS (Cambodia) Limited
France	05/04/2022	SGS France
	17/05/2022	
	19/10/2022	
	03/02/2022	Bureau Veritas Certification
	21/07/2022	
	27/07/2022	
	15/06/2022	BUREAU VERITAS CPS - EMEA
	01/12/2022	
	05/09/2022	DNV
Germany	21/04/2022	Intertek Germany
	19/04/2022	
	05/05/2022	Bureau Veritas Certification
	12/08/2022	

Country	Date of audit	Auditors
	14/07/2022	TUV NORD CERT GmbH
Greece	07/07/2022	Intertek Bulgaria
	31/05/2022	SGS_U
Hungary	01/07/2022	Bureau Veritas Certification
India	26/05/2022	Bureau Veritas Certification
	20/07/2022	SGS ASIA
	07/11/2022	
	18/03/2022	Intertek India
Italy	22/06/2022	Intertek Italy
	14/04/2022	
	06/06/2022	SGS Italy
	25/05/2022	
	23/11/2022	BUREAU VERITAS CPS - EMEA
Mexico	08/06/2022	DNV
Netherlands	25/08/2022	Bureau Veritas Certification
Pakistan	04/10/2022	ALGI Pakistan
	29/09/2022	ELEVATE
	16/07/2022	ALGI Pakistan
Peru	10/08/2022	SIPAS CR-PERU
Poland	03/11/2022	SGS Poland
Portugal	14/10/2022	Intertek Portugal
Thailand	02/09/2022	SGS Thailand
	02/11/2022	
	17/03/2022	
	19/09/2022	

Country	Date of audit	Auditors
	25/05/2022	
Turkey	14/02/2022	Intertek Turkey
United States	18/01/2022	Accordia Global Compliance Group (Home Office)
	23/02/2022	Intertek Peru
United Kingdom	22/02/2022	SGS_UK
	28/09/2022	Verisio
	01/08/2022	Intertek UK
	08/08/2022	Verner Wheelock (incorporating KSSA)
	21/11/2022	
	24/05/2022	

This notwithstanding, in response to the EU Proposal for a Corporate Sustainability Due Diligence Directive and the recent approval of the Corporate Sustainability Reporting Directive (CSRD), the Group will, in 2023, commence a Due Diligence procedure among its suppliers to identify and manage any real or potential impacts during their supply chains affecting Human Rights and the Environment.

We should mention in this regard that the implementation of all these programmes has helped to confirm that no adverse environmental or social impacts have been identified in our supply chain.

11. COMMITMENT TO THE ENVIRONMENT

Scope of Reporting

The information set out below corresponds to 73 of the 78 production plants and offices that the Ebro Group has through its different companies.

All the emission factors, low calorific values (LCV) and global warming effect used are set out in Annex 3.

Management focus

The main goals of the Ebro Group's environmental commitment are defined in our Policy on Sustainability, Environment and Corporate Social Responsibility: "Steer the company's processes, activities and decisions to protect our environment, prevent and minimise environmental impact, optimise the use of natural resources and preserve biodiversity."

According to this declaration, the Group's actions are based on the following:

1. Ensure that our companies comply with the environmental laws applicable to their respective activities by implementing internal management systems and monitoring the applicable laws and regulations.
2. Minimise the environmental impact of our activity by seeking eco-friendly solutions and embarking on initiatives to reduce our emissions, optimising our consumption of water, energy and packaging material.
3. Transition towards a circular economy, recovering waste and favouring its recycling and reuse, using recycled raw materials and/or those respectful of the environment, whenever possible.
4. Organise environmental awareness and training programmes for Group employees.
5. Promote the use of sustainable crop techniques among our agricultural suppliers.

With regard to our operations, the processes used at Ebro Group's production plants in both the rice and pasta divisions are relatively simple agri-food processes that do not generate any major environmental impacts and entail a minimal risk of accidental pollution. The most significant environmental risks relating to the Ebro Group can be classified as follows:

1. Air emissions: Mainly emissions of particles during the handling of cereals and greenhouse gas (GHG) emissions related to the consumption of fossil fuels and electricity. The most widely used fuel is natural gas.
2. Noise emissions: These emissions are produced during the operation of engines, compressors, sleeve filters and other manufacturing equipment. All our plants comply with the environmental standards and the noise levels are monitored regularly, taking mitigation measures wherever necessary.

3. Production processes: Essentially mechanical and hydrothermal, requiring the use of very few chemical products and in very small quantities. Most of these products are used to clean the equipment and cleanse the raw materials and are relatively harmless for the environment.
4. Water consumption: The amount of water used in our processes is negligible (the vast majority of our products are dry) so the volume of effluent generated is also small. Moreover, the little effluent produced has a low level of contamination since the water consumed is basically used to produce steam, for cooling or as an ingredient in the finished products.
5. Waste generation and management: The company generates minimal amounts of waste, both non-hazardous (mainly packaging of ingredients and ancillary materials) and hazardous (maintenance operations) and it is managed through authorised waste disposal contractors.

Precautionary principle

The guidelines on which the precautionary principle is based are set out in the Group's Code of Conduct and Policy on Sustainability, Environment and Corporate Social Responsibility. In both texts, Ebro Foods declares its firm commitment to respect the environment and preserve biodiversity. It also sees that its companies comply with the environmental laws applicable to their operations and any additional commitments assumed voluntarily, and applies environmental sustainability programmes in specific matters.

GRI 301: Materials

This indicator is reported under standard GRI 301 (2016).

Raw Materials [301-1]

The raw materials used are divided into two major categories, those used in the preparation of finished goods and the packaging materials.

The raw materials used in finished goods are divided into five categories:

1. Rice
2. Durum wheat and semolina/durum wheat flour
3. Other raw materials of plant origin: quinoa, pulses, other cereals, other flours/semolinas, fruit and vegetables and soya/soybean oil
4. Raw materials of animal origin: meat, fish and eggs
5. Other ingredients: e.g. spices and flavourings used mainly in precooked food.

Raw Materials (t)	2022		2021	
	t	%	t	%
Rice	2,058,274	86.19%	2,028,296	87.28%
Wheat and wheat flours/semolina	222,542	9.32%	194,361	8.36%
Other RM plant origin	75,022	3.14%	64,841	2.79%
RM animal origin	20,175	0.84%	19,238	0.83%
Other ingredients	12,179	0.51%	17,158	0.74%
Total	2,388,191		2,323,894	

We do not use palm oil in the preparation of any of our products.

Although the use of raw materials from animal origin is less than 1% of the total in our products, corresponding to egg, the Ebro Group has undertaken to use exclusively ingredients from cage-free eggs in the production of any foods requiring that raw material as from 2025. This undertaking is extended to all the Group's companies in Spain and has also been adopted by Lustucru Frais in France. In 2022, the use of ingredients from cage-free eggs was already up to 99% in Spain and 82% in France.

Packaging materials [301-1]

The packaging materials for finished products are mainly paper, cardboard and plastic.

Type of Material	2022		2021	
Plastic	45,086	48%	38,247	46%
Paper	46,830	50%	43,227	52%
Glass	0	0%	0	0%
Metal	3	0%	6	0%
Others	1,340	1%	1,600	2%
TOTAL	93,258		83,080	

Recycled input materials [301-2]

Based on the information received from the suppliers of packaging materials regarding the composition of their materials, we have calculated the recycled fibre/polymer content of the different types of packaging we use.

To preserve and guarantee the utmost food safety of our products, the primary packaging, which is in direct contact with the food, must have a 100% virgin material composition or be certified as suitable for use in the food industry. In this scenario, our primary packaging contains 6% recycled material.

The different secondary and tertiary packaging formats used by the Group both contain 74% of recycled fibre, on average.

GRI 302: Energy

This indicator is reported under standard GRI 303 (2016).

The energy consumption and inventory of greenhouse gas (GHG) emissions of all the Group companies is calculated under standard ISO 14064-1:2019.

Energy consumption within the organisation [302-1]

We separate energy consumption within the organisation into direct consumption and indirect consumption.

The direct energy consumption is calculated taking into account the following:

1. The consumption of non-renewable fuels in stationary and mobile sources:
2. The consumption of renewable fuel:
 - a. Rice husk, a by-product of our industrial processes, used by Ebro India, Herba Ricemills and Mundiriso
 - b. Wood chips used by Ebro Frost
 - c. Charcoal used by Ebro India
3. The self-generated energy in photovoltaic and cogeneration facilities
4. The self-generated energy sold from photovoltaic and cogeneration facilities

Direct consumption (GJ)

Non-renewable fuel consumed	2022		2021	
Natural gas	2,807,055	94.50%	2,722,752	75.63%
Other non-renewables	76,690	2.58%	805,189	22.36%
Total consumption non-renewables (GJ)	2,883,745	97.08%	3,527,941	97.99%
Renewable fuel consumed	2022		2021	
Biomass/Charcoal	80,976	2.73%	70,194	1.95%
Total consumption renewables (GJ)	80,976	2.73%	70,194	1.95%
Self-generated energy	2022		2021	
Photovoltaic panels	6,361	0.21%	2,956	0.08%
Cogeneration	101,081	3.40%	94,458	2.62%
Total self-generation (GJ)	107,442	3.62%	97,414	2.71%
Self-generated energy sold	2022		2021	
Photovoltaic panels	6	0.00%	13	0.00%
Stationary combustion/Cogeneration	553	0.02%	838	0.02%
Total self-generation sold (GJ)	559	0.02%	851	0.02%
Self-consumption photovoltaic	2022		2021	
Self-consumption PV (GJ)	6,355	0.21%	2,943	0.08%
Total direct consumption (GJ)	2,970,524	100.00%	3,600,240	100%

3.6% of the direct consumption energy is self-generated at the photovoltaic facilities of our subsidiaries Arotz, Bertagni, Ebro Frost, Ebro India, Garofalo, Geovita, Herba Ricemills, Mundiriso and Transimpex, and at the cogeneration plants of Bertagni, Ebro Frost, Garofalo and Geovita.

Indirect consumption (GJ)

7.7% of the electricity purchased (indirect consumption) has a guarantee of renewable origin.

Indirect consumption	2022		2021	
	GJ	%	GJ	%
Electricity without GoO	920.955	91,55%	865.569	91,18%
Electricity with GoO	76.643	7,62%	73.992	7,79%
Steam	7.768	0,77%	9.149	0,96%
Heat	551	0,05%	546	0,06%
Cooling	0	0,00%	0	0,00%
Total indirect consumption (GJ)	1.005.916	100,00%	949.256	100,00%

Total energy consumption	2022		2021	
	GJ	%	GJ	%
Direct consumption	2.970.524	74,70%	3.600.240	79,13%
Indirect consumption	1.005.916	25,30%	949.256	20,87%
Total energy consumption (GJ)	3.976.440	100,00%	4.549.495	100,00%

Energy consumption outside of the organisation [302-2]

We do not have the methodologies or activity data to calculate energy consumption outside of the organisation.

Energy intensity [302-3]

Energy intensity	2022	2021
Total energy consumed (GJ)	3,976,440	4,549,495
Net Sales Ebro (M€)	2,967.6	2,427.1
Energy intensity (GJ/M€ net sales)	1,340	1,874

 Reduction of energy consumption [302-4]

Ten companies in the Ebro Group have reported different initiatives to reduce their energy consumption, with a total investment of EUR 1,017,718.

Company	Plant	Initiative	Cost (EUR)
Geovita	Villanova Monferrato	Cogeneration plant	520,000
Bertagni	Avio & Vicenza	Cogeneration plants	90,653
Ebro Foods Belgium, N.V.	Merksem (plant A)	New, more efficient compressor	151,280
S&B Herba Foods	Cambridge (Fullborn)	New, more efficient compressor	31,818
Herba Ricemills	San Juan de Aznalfarache	Renovation of equipment to improve heat transfer and reduce heat losses	105,168
Lustucru Frais	Communay	Heat recovery system in refrigeration unit, and water recovery	31,581
Mundi Riso	Vercelli	Improvement of heat insulation in packaging area	31,000
Riviana Foods Canada	Hamilton	Change from conventional lighting to LED	14,523
Arrozeiras Mundiarroz	Coruche	Change from conventional lighting to LED	3,701
Herba Ricemills	San Juan de Aznalfarache	Change from conventional lighting to LED	24,562
Tilda	Classic site	Change from conventional lighting to LED	13,432

GRI 303: Water and Effluents

This indicator is reported under standard GRI 303 (2018)

 Interactions with water [303-1]

Water consumption in Ebro includes water consumed in offices and in the manufacturing process. The production processes of pasta and precooked food are more water-intensive than the dry rice production process. The consumption of well water used by Agromeruan in rice growing is also included.

 Management of water discharge-related impacts [303-2]

All effluent is discharged to the sewage networks, except from Bertagni, Ebro India, Ebro India, Ebro Frost and Mundiriz, which discharge into continental waters.

Water withdrawal [303-3]

The surface water withdrawn and used by the company Agromeruan for its agricultural activities in Morocco accounts for 78% of the total consumption by the Group. In this context, the global performance of our industrial activities account for use of the 22% remaining water withdrawal: 83% from the municipal water supply (third-party water) and 17% from groundwater.

Water withdrawal	2022	%	2021	%
Third-party water	2,757,089	18%	2,588,676	17%
Groundwater	544,884	4%	617,738	4%
Total industrial processes (m3)	3,301,972	22%	3,206,414	21%
Inland surface freshwater	11,880,000	78%	11,880,000	79%
Inland surface salt water	0	0%	0	0%
Total water withdrawn (m3)	15,181,972		15,086,414	
Total withdrawal freshwater (SS<1000 mg/l)	15,181,972		15,086,414	
Total withdrawal other water(SS>1000 mg/l)	0		0	

Water withdrawal by areas of water stress

Using the World Resources Institute (WRI) classification of water stress areas, the group's water withdrawal by areas of water stress is as follows:

Water withdrawal by areas of Water Stress	2022		2021	
	m3	%	m3	%
High	12,856,367	85%	12,724,396	84%
Low	84,929	1%	90,454	1%
Low-medium	1,505,808	10%	1,554,807	10%
Extremely high	46,239	0%	31,962	0%
Medium-high	688,630	5%	684,796	5%
Total water withdrawn (m3)	15,181,972		15,086,414	

NB: 92% of the water withdrawn in areas of high water stress corresponds to the agricultural activities of Agromeruan.

Water discharge [303-4]

Destination of discharge	2022	2021
Third party water (Sewage network, treatment plants)	2,002,340	1,978,571
Inland water	237,695	265,802
Seawater	0	0
Total (m3)	2,240,035	2,244,373

Discharge treatment	2022	2021
---------------------	------	------

No treatment	1,048,824	1,697,143
Aerobic treatment	1,191,211	537,375
Anaerobic treatment	0	9,854
Total (m3)	2,240,035	2,244,373

Type of discharge	2022	2021
Freshwater (SS<1000 mg/l)	1,683,276	1,601,752
Other water (SS>1000 mg/l)	556,760	642,621
Total (m3)	2,240,035	2,244,373

Discharge by areas of Water Stress	2022		2021	
	Freshwater discharged (SS<1000 mg/l)	Other Water discharged (SS>1000 mg/l)	Freshwater discharged (SS<1000 mg/l)	Other Water discharged (SS>1000 mg/l)
High	813,284	0	701,409	0
Low	73,808	0	51,222	0
Low-medium	272,994	483,600	280,767	642,621
Extremely high	20,858	0	9,854	0
Medium-high	502,331	73,160	558,500	0
Total discharge (m3)	1,683,276	556,760	1,601,752	642,621

No accidental discharge occurred in 2022.

Reduction of water consumption and improvements to effluent quality

Two companies in the Ebro Group reported initiatives to reduce water consumption or improve the quality of the effluent, with a total investment of EUR 417,606.

Company	Plant	Initiative	Cost (EUR)
Bertagni	Avio & Vicenza	Improvements to water purifier	184,308
Riviana Foods Canada	Delta	Replacement of grease trap to improve the effluent quality	233,298

 Water consumption [303-5]


Water Consumption	2022	2021
Water withdrawal	15,181,972	15,086,414
Water discharge	2,240,035	2,244,373
Water sold	0	0
Total water consumption (m3)	12,941,937	12,842,042

NB: The volume of water used in the rice crop in Morocco has not been considered discharge

Discharge by areas of Water Stress	2022	%	2021	%
High	12,043,083	93%	12,022,987	94%
Low	11,121	0%	39,232	0%
Low-medium	749,214	6%	631,418	5%
Extremely high	25,381	0%	22,108	0%
Medium-high	113,139	1%	126,296	1%
Total water consumption (m3)	12,941,937		12,842,042	

GRI 304: Biodiversity

This indicator is reported under standard GRI 304 (2016).

 Operational sites in or adjacent to protected areas and areas of high biodiversity value outside protected areas [304-1]

The Riviana plant in Freeport, Texas (United States) is adjacent to a protected area of wetland, PEM1A, Brazos River.

Tilda has a jetty on the River Thames (United Kingdom).

 Significant impacts of activities, products, and services on biodiversity [304-2]

There have been no impacts in any areas considered of high biodiversity value.

 Habitats protected or restored [304-3]

No restoration measures have been implemented in protected habitats.

Climate Change

Climate change poses a serious threat for the Group's business activities as it directly affects essential aspects such as the production of raw materials, the availability of critical resources (e.g. water), the viability of product transport, logistics and distribution operations and increased energy needs of our production processes, among others.

Accordingly, in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), we have identified the potential risks, impacts and opportunities that climate change may have on our organisation, establishing the appropriate mitigation and/or adaptation measures for each one. This will shortly be taken further, with the financial quantification of those risks and impacts.

Some of the mitigation measures are already contemplated in our Sustainability Plan HEADING FOR 2030, including: 1) making a more efficient consumption of water and energy; 2) reducing, recovering and re-using waste; 3) recycling packaging; 4) optimising logistics; and 5) using new sustainable agriculture models and technologies. The details and monitoring of each of these measures is available on the website caringforyouandtheplanet.com.

To calculate Scope 1 and 2 of the Group's Carbon Footprint we developed a Greenhouse Gas Emissions Inventory procedure for all the Group companies under standard ISO 14064-1:2019. We have not yet defined our reduction goals, but we have already started to develop emissions reduction initiatives. We thus have:

Photovoltaic installations:	Arotz, Bertagni, Ebro Frost Germany, Ebro India, Herba Ricemills, Garofalo, Geovita, Mundiriso and Transimpex
Cogeneration:	Bertagni, Ebro Frost Germany, Garofalo and Geovita
Biomass:	Ebro Frost Denmark, Herba Ricemills, Mundiriso and Ebro India

The next stage will be to measure Scope 3 and define an emissions reduction plan for all three scopes.

With regard to Scope 3, through our accession to the Lean & Green Programme for the calculation-reduction-offset of emissions produced in national overland logistics (Spain), we have completed the reduction plan (20% in 5 years) and continue to calculate our logistics footprint every year.

Also in Scope 3, the Ebro Group takes an active approach to the promotion and investigation of environmentally sustainable growing techniques for application to the rice crop in different production areas, to contribute towards greater preservation of the environment, promote biodiversity and mitigate the effects of climate change. This work is done through own initiatives and specific collaborations with stakeholders and sectoral associations, particularly the Sustainable Agriculture Initiative Platform (SAI Platform) and the Sustainable Rice Platform (SRP).

In 2022, the most important examples of this work were:

- Thailand: Sustainable Aromatic Rice Initiative of Thailand (SARI-T)

This is a programme developed jointly with Mars, GIZ and the Thai Rice Department, which aims to enhance sustainably the economic viability of 1,200 rice growers in the province of Roi Et and the production of high quality Hom Mali aromatic rice. The incorporation of good agricultural practices that respect the environment improves growers' livelihoods. The Sustainable Rice Platform (SRP) crop verification is also made. The project completed its fifth year of rice production in 2022 and will probably be extended.

- Spain: Oryzonte Programme

This programme is developed in the Guadalquivir Marshes (Seville) jointly with Mars Food and Danone.

The project, which began in 2018, aims to improve the sustainability of the rice crop in the province of Seville, where the largest rice-growing area is located in Spain, focusing on three key areas: water, greenhouse gas emissions (GHG) and biodiversity.

- With regard to GHG emissions, the measurements recorded in the control plot were considerably lower than those reported in other regions of Spain, which could be due to the high clay and sulphate content of the soils in Seville. In addition, the work has shown that the implementation of specific practices aligned with the guidelines of the Intergovernmental Panel on Climate Change (IPCC), such as Alternate Wetting and Drying (AWD) techniques, actually reduce GHG emissions from the Seville rice fields. In this regard, by implementing the AWD techniques, the project has measured a 60% reduction in GHG emissions and a considerable reduction of 63% in methane emissions in comparison with the levels recorded where the growers' habitual practices were implemented.

Similarly, the measurement of emissions has shown that the practice of *stopping winter flooding* considerably reduces GHG emissions in comparison with traditional practices, where the fields are kept flooded from harvesting to mid-January.

In all cases, the emissions of other greenhouse gases (particularly nitrous oxide) were not material. Therefore, the potential of global warming is significantly reduced through the implementation of *intermittent irrigation* and *stopping winter flooding*.

In 2022, AWD was implemented on 255 Ha and we are still working with rice growers in the region to encourage the use of these practices on their land. We are working with *Sustain Cert* to certify these results.

- With regard to water, the project collaborates with the National Council for Scientific Research (CSIC) in the development of a water and salinity model to improve and monitor use of water practices. A key part of this work is to determine the yield/salinity ratio in the conditions present in Seville.
- Biodiversity. The programme has continued with the installation of vertical structures and nests for bats and birds of prey of special interest, such as the barn owl or the lesser kestrel. Encouraging the presence of these birds of prey and bats is a promising strategy to reduce the use of pesticides and increase the sustainability of the agricultural production systems.

- India: programmes

Our company Ebro India has continued working on different sustainable agriculture projects, some of which have been in place for several years, such as EKTA, Organic Farming, Control Farming and, since 2021, a new project focusing on the reduction of water consumption and emissions.

One of the greatest challenges in India is compliance with the maximum pesticide residue limits (MRL) permitted in the European Union. Through the Control Farming programme, Ebro India works closely with the growers in monitoring all the agricultural practices they use from

sowing to harvesting, educating them in the correct use of pesticides and fungicides in terms of quantity, quality and timing.

The new project that commenced in the previous year to reduce water consumption and emissions in farming is intended to benefit the same group of growers as Control Farming. In 2022, more than 50 growers, the equivalent of 3000 Ha of crops, have used the Alternate Wetting and Drying (AWD) techniques, with which they have managed to reduce water consumption and methane emissions. Biological plague control measures (spider bundles and pheromone traps) have also been used to reduce the use of pesticides. Another significant aspect of the programme is the use of pseudomonas by some growers, which helps to inhibit pathogenic microorganisms, stimulate the synthesis of growth hormones and strengthen disease resistance in rice plants, while reducing the quantity of pesticides needed to combat plagues. All these initiatives have been welcomed by growers.

The EKTA programme, which has been running since 2015, provides continuous support for over 6000 growers throughout all the stages of the crop, from the treatment of seeds to the post-harvest stage. EKTA runs schools in the villages to provide training in best agricultural practices, focusing on saving water and promoting biological plague-control measures. A number of experts participate in the project to respond to specific questions raised by growers.

Finally, the Organic Farming programme involves joint work with around 400 growers for the production of organic basmati rice certified under the Fair Trade standard.

- Other programmes focusing on the sustainability of our agricultural raw material

Other Group companies have worked during the year on implementing rice crop verification programmes under the sustainability standard, Farm Sustainability Assessment (FSA), of the SAI Platform. Those companies – Mundiriso, Riviana Foods and Ebrosur – have implemented the FSA standard on producers in Italy, United States and Argentina, respectively.

In Italy, the subsidiary Garofalo embarked on a sustainable durum wheat growing programme in 2022 together with its agricultural suppliers to optimise the use of fertilizers, pesticides and water.

We should also point out that in order to address the challenges of climate change and follow any changes in law in this area, the Ebro Group is a member of the Climate Change Cluster promoted by Forética (www.foretica.org). In that Cluster, a group of large companies work together to lead the strategic positioning addressing climate change in the business agenda, discuss and exchange views and good practices, participate in the global debate and become key players in the decisions made at the administrative level.

GRI 305: Emissions

This indicator is reported under standard GRI 305 (2016).

The methodology employed under ISO 14064-1:2019 is of calculation, using the activity data of each company/plant and emission factors taken from official sources (Annex 3), applied to all the group's plants. All the gases are included in the calculation: CO₂, CH₄, N₂O, HFC, PFC, SF₆ and NF₃.

The Ebro Group's GHG emissions are consolidated under the operational control approach, including: (a) direct GHG emissions and (b) indirect GHG emissions for imported energy.

Direct (Scope 1) GHG emissions [305-1]

The sources of direct (Scope 1) GHG emissions are:

- ✓ Emissions of CO₂, CH₄ and N₂O from fossil fuel consumption by stationary sources and mobile sources (fleet of vehicles and machinery).
- ✓ Leaks of cooling gases (HFC) from HCAV equipment
- ✓ Emissions of CH₄ from the rice crop
- ✓ Emissions of N₂O from elimination of nutrients in water treatment
- ✓ Direct emissions of CH₄ and N₂O from Biomass (rice husk, wood and charcoal)

Indirect (Scope 2) GHG emissions [305-2]

The sources of indirect (Scope 2) GHG emissions are:

- ✓ Emissions of CO₂ from energy consumption (electricity, heat, steam and cold) in installations and processes.

GHG emissions	2022		2021	
Scope 1 emissions	171,685	63%	215,575	69%
Scope 2 emissions	102,467	37%	97,253	31%
Total emissions (t CO₂e)	274,153		312,828	

We calculate the Scope 2 emissions according to the location, using specific emission factors of each country.

The emissions from the rice crop of Mundi Riz in Morocco account for 2.6% of the Scope 1 emissions and 1.6% of the total emissions of the Group.

Biogenic CO₂ emissions

Biogenic CO₂ emissions are produced in the combustion of renewable fuels, in our case rice husk, wood chips and charcoal.

Biogenic CO ₂ Emissions	2022	2021
Biogenic CO ₂ (t)	8,666	7,466




Other indirect (Scope 3) GHG emissions [305-3]

We do not have the methodologies or activity data to calculate all the indirect GHG emissions produced outside the organisation (Scope 3). We plan to calculate Scope 3 over the course of 2023-2024, and subsequently define specific targets for emissions reduction. For the time being, we have the following partial measurements:

- The emissions associated with the maritime logistics of our raw materials and products of the Group's rice division. This calculation is made using the EccoPrint tool developed by EccoFreight and includes the transport (by rail and/or road) from the source plant to the port of departure and from the port of arrival to our plant.

In 2022, EccoFreight handled approximately 17% of the shipments of the entire rice division, with 190,643 tonnes shipped and GHG emissions of 46,235 t CO₂e.

By choosing more efficient routes instead of other alternative routes available with larger carbon footprints, we avoided the emission of 21,675 t CO₂e, which is a 32% reduction of our Scope 3 emissions with EccoFreight.

- Emissions associated with national overland logistics (Spain). We continue working to reduce our logistics carbon footprint after joining the Lean & Green programme. After defining 2019 as the base year and the total t CO₂e/tonne of product of freight for sale, significant progress has been achieved:
 -  2020: 6.06% reduction
 -  2021: 17.60% reduction
 -  2022: measurement of carbon footprint in progress

GHG emissions intensity [305-4]

Emissions Intensity	2022	2021
Total GHG emissions (t CO ₂ e)	274,152.7	312,828.3
Ebro Net Sales (M€)	2,967.6	2,427.1
GHG emissions intensity (t CO₂e M€ net sales)	92	129

Reduction of GHG emissions [305-5]

We are studying the possibility of defining emissions reduction objectives aligned with the recommendations of the scientific community. We plan to calculate our Scope 3 emissions over the course of 2023-2024 and subsequently define specific emission reduction targets.

In addition to the energy reduction initiatives described in section 302 energy, which entail reducing emissions, three companies have implemented initiatives to reduce emissions, for a total value of EUR 1,397,993.

Company	Plant	Initiative	Cost (EUR)
Ebro Frost Germany	Offingen	Photovoltaic plant	211,328
Ebro India	Taraori	Photovoltaic plant	565,275
Herba Ricemills	Rinconada	Photovoltaic plant	554,153
Ebro India	Taraori	Emissions scrubber in boiler chimney, new, more efficient compressors	67,177

Emissions of ozone-depleting substances (ODS) [305-6]

Thanks to the development of specific laws (on an international, European and national level) and the efforts of the sectors affected, ODS production and consumption have been practically phased out. The Ebro Group's activities are not included in any of the main sectors that use or used ODS, so in our opinion this indicator is not material and is not calculated.

NOx, SOx and other significant air emissions [305-7]

We calculate the emissions of air pollutants associated with the stationary and mobile combustion processes, as they are the most significant. The NOx, SOx, etc. emissions are obtained by multiplying the GJ by a specific emissions factor for each type of pollutant.

In accordance with the applicable environmental laws and regulations, regular inspections and measurements are made by an external company to check compliance. No non-compliance was detected during the year.

NOx, SOx & other emissions (t)	2022							TOTAL
	NOX	CO	COV	SOx	PM10	PM2.5	PM	
Stationary combustion	224	129	90	3	14	14		474
Mobile combustion	9	13	2				1	25
Total Pollutants (t)	233	142	92	3	14	14	1	499

NB: The vast reduction of CO emissions in comparison with 2021 is due to the change of fuel used in Riviana Foods.

In 2022, through the purchase of electricity with guarantee of origin (GoO), photovoltaic self-generation and the use of fuels from renewable sources, we have avoided the emission of 9,350 t CO₂e.

Activity	MWh	2022
		Emissions avoided (t CO2e)
Electricity with GoO	21,290	4,117
Photovoltaic self-generation	1,767	685
Biomass	22,493	4,547
Total	45,550	9,350

Measures to reduce noise and light pollution

All our plants comply with environmental standards and make the necessary measurements to make sure they keep within the noise and light pollution limits. Herba Ricemills updated the noise map of its San Juan de Aznalfarache plant in 2022.

GRI 306: Waste

This indicator is reported under standard GRI 306 (2020).

Waste generation [306-1]

Most of the waste generated by our business is classified as non-hazardous waste. There is also a small proportion of hazardous waste generation, mainly waste from the packaging of chemical products used in maintenance work at our facilities.

Management of significant waste-related impacts [306-2]

All waste of whatever type is separated by kind and taken to authorised waste disposal contractors for treatment according to the laws in place in each geographical area, giving priority to recycling and reuse wherever possible.

Circularity measures

To guarantee meeting the reduction, recycling and re-use targets defined in the Packaging and Packaging Waste Act 11/97 of 24 April, our Spanish subsidiary Herba has joined Ecoembalajes España, S.A. (Ecoembes), which has the mission of designing and developing systems for selective collection and recovery of used packaging and packaging waste. Ecoembes uses the “Green Dot” (symbol that appears on the packaging) to show that the packager of the product has paid a sum of money for each package put on the market.

Both the European rice companies and the head offices of Ebro Foods have signed agreements with companies similar to Ecoembes for the destruction of paper and other data carriers. With these agreements, apart from complying with the Data Protection Act, they guarantee a sustainable management of the documentation through the undertaking by these companies to destroy and recycle the material.

As part of our commitment to having 100% recyclable packaging by 2030, the dry rice products of our brands Arroz SOS, La Fallera, Sabroz and La Cigala in España, Risella in Finland and Brillante rice cups, one of the formats that the Group sells most, are now 100% recyclable.

Apart from that, the Group has worked on three principal projects in 2022 to make our packaging more recyclable.

1. For our brand SOS specialties, sold in flexible non-recyclable packaging (polyethylene & polypropylene PE/PP), we studied the possibility of changing the composition to recyclable paper. As the necessary line productivity was not reached with that alternative packaging and it was not economically viable, we finally opted to change to a mono-polymer polypropylene, which is 100% recyclable.
2. Mono-material polypropylene (PP) doypack. The tests run in Herba and Tilda did not produce satisfactory results. The use of a mono-material 100% polypropylene base to replace the two triplex currently in use (Polyester/Polyamide/Polypropylene and Polyester/High Barrier Polyester/Polypropylene (PET/PA/PP and PET/HB PET/PP) has turned out not to have sufficient line productivity or oxygen barrier to preserve the organoleptic properties of the food. We continue to seek feasible alternatives that will guarantee the food preservation properties of the packaging used at present.
3. We increased the number of lines used by different plants in the Group to manufacture the compact 1 kg and 0.5 kg paperboard format to replace polypropylene.
 - a. In Antwerp (Ebro Foods Belgium), in order to be able to work with paperboard (the same product used at the Silla plant for the La Fallera brand), the company invested in the tube and former of the filling unit to make the line compatible with the use of paper.
 - b. Tests are being run for the same purpose on the compact 1 kg and 0.5 kg line in Vercelli (Mundiriso), with a view to including paperboard as a possible replacement for polypropylene.

Actions to combat food waste

The main internal policy for food surplus within the Group (defining surplus as products suitable for consumption but which, for different reasons -such as packaging defects, being close to their use-by date, etc.- are not suitable for sale to consumers) is donation to food banks.

The Ebro Group also participates actively in the programme “Don’t waste food”, a collaborative initiative to reduce food waste, led by AECOC, the association of large consumer companies.

The three principal objectives of the project are to:

- Establish prevention and efficiency practices throughout the food chain to reduce waste
- Maximise use of the surplus produced in different stages of the value chain (redistribution, reuse and recycling)
- Make society aware of this problem and the need to reduce food waste

The initiative is supported by over 350 manufacturers and distributors in the large consumer sector, logistics and haulage operators, business associations, consumer organisations and other institutions and is coordinated by AECOC.

The programme aims to inform people about the efforts being made by companies to prevent food waste and promote enhanced collaboration to gradually reduce the problem. Every year some 7.7 million tonnes of food is wasted in Spain. Therefore, the “*Don’t waste food*” programme aims to make consumers throughout the world aware of the problems of food waste and get them to participate in the initiative, encouraging them to collaborate in order to reduce the waste generated by each person.

Measures for waste prevention, recycling, reuse and other forms of recovery and elimination

All the companies in our Group have contracted the management of hazardous and non-hazardous waste to authorised waste disposal contractors.

Some of the Group's rice companies use the husk from their manufacturing processes as a source of renewable energy. During 2022, Ebro India, Mundi Riso and Herba Ricemills reported the use of rice husk as a renewable fuel to obtain thermal energy.

Waste generated [306-3]

Waste	2022		2021	
Non-hazardous	36,757	99%	34,858	100%
Hazardous	285	1%	118	0%
Total Waste (t)	37,042		34,976	

NB: The increase in hazardous waste, although still negligible, is due to the fact that Ebro India did not report ash as waste before now, because it did not have the methods necessary to quantify it.

Waste for recovery [306-4] and disposal [306-5]

Destination of Waste	2022		2021	
Total Waste for Disposal	14,193	38%	13,978	40%
Total Waste for Recovery	22,850	62%	20,999	60%
Total Waste (t)	37,042		34,976	

Non-Hazardous Waste for Disposal	2022		2021	
Landfill	10,416	28%	11,450	33%
Incineration	727	2%	721	2%
Other disposal operations	2,801	8%	1,751	5%
Total disposal NH waste (t)	13,943	38%	13,921	40%
Non-Hazardous Waste for Recovery	2022		2021	
Recycled	8,913	24%	5,185	15%
Composted	3,552	10%	4,273	12%
Reused	10,164	28%	10,870	31%
Other recovery operations	185	1%	610	2%
Total recovery NH waste (t)	22,814	62%	20,937	60%
Total Non-Hazardous Waste (t)	36,757		34,858	

Hazardous Waste for Disposal	2022		2021	
Landfill	218	76%	0	0%
Incineration	16	6%	13	11%
Other disposal operations	16	6%	44	37%
Total disposal H waste (t)	250	88%	57	48%
Hazardous Waste for Recovery	2022		2021	
Recycled	32	11%	43	36%
Composted	0	0%	4	3%
Reused	1	0%	0	0%
Other recovery operations	2	1%	15	13%
Total recovery H waste (t)	36	12%	62	52%
Total Hazardous Waste (t)	285		118	

Actions to increase waste recovery

In Spain, the company Herba Ricemills has made a profound change in its waste management. As a result, in 2022, 99% of the waste generated was managed through recovery operations.

In addition, two companies in the Ebro Group have reported initiatives to improve waste management and recovery, investing a total sum of EUR 14,100.

Company	Plant	Initiative	Cost (EUR)
S&B Herba Foods	Liverpool	New cardboard compactors	13,600
Riviana Foods Canada	Hamilton	Training for operators on waste separation	500

GRI 2-27 Environmental Compliance

Non-compliance with environmental laws and regulations [2-27]

In 2022, 3 plants reported minor non-compliance with environmental laws and regulations that did not lead to fines as appropriate measures had been taken.

Company	Plant	Environmental non-compliance
Arrozeiras Mundiarroz	Coruche	Exceeding permitted use of water
Lustucru	St. Genis Laval	Non-compliance of pH and temperature of effluent
Riviana Foods	Alvin	Emissions records not available
Riviana Foods Canada	Delta	pH of effluent off specification

Provisions and guarantees for environmental risks

All the Group companies have taken out third party liability insurance covering any damage caused by sudden, unintentional, accidental pollution; that insurance is considered to cover any possible risks of this nature. To date there have been no significant claims for environmental issues, favourable outcomes of audits and inspections, and no allegations in the processing of Integrated Environmental Authorisations, etc.

Environmental assessment and certification procedures

Total compliance with the laws and regulations applicable to its activities is a basic principle and goal in the Ebro Group environmental management. All the production plants of the Ebro Group operate under the applicable certifications, specifications and authorisations in their respective geographical areas and internally manage their environmental aspects accordingly.

The following workplaces have an environmental management system certified under UNE-EN-ISO 14001:

- Herba Ricemills (San Juan, Coria, Los Palacios, La Rinconada and Isla Mayor plants)
- Garofalo Gragnano

Investments in environmental risk prevention

Twelve of the 33 companies covered by this report have reported investments in measures to reduce / optimise energy consumption, water consumption, GHG emissions and waste management:

- Arrozeiras Mundiarroz
- Bertagni
- Ebro Foods Belgium
- Ebro Frost Germany
- Ebro India
- Geovita
- Herba Ricemills
- Lustucru Frais

- Mundiriso
- Riviana Foods Canada
- S&B Herba Foods
- Tilda

Environmental expense and investment	2022	2021
Cost of management and control	€1,404,433	€1,143,950
Investment to minimise impact	€2,913,228	€4,747,655
Total	€4,317,661	€5,891,605

The investments reported here include measures to reduce energy consumption, water consumption and emissions, as well as the cost of waste management, regulatory inspections, noise measurements and analyses. They also include initiatives to adapt to climate change, such as the Oryzonte project, which aims to reduce water consumption and GHG emissions, and rice crop verifications under the SRP standard in Spain.

The principal investments were made by Herba Ricemills, Ebro India and Geovita, with the installation of two photovoltaic plants and one cogeneration plant, respectively.

ANNEX 1

List of subsidiaries of the Ebro Group

Company	Country	Business Area
Agromeruan, SARL AU	Morocco	Rice
Arotz Foods, S.A.	Spain	Others
Riceeiras MundiRice, S.A.	Portugal	Rice
Bertagni 1882, S.P.A.	Italy	Pasta
Ebro Foods, S.A.	Spain	Holding
Ebro Foods Belgium, N.V.	Belgium	Rice
Ebro Foods Netherlands B.V.	Netherlands	Rice
Ebro India, Private Ltd.	India	Rice
Ebro Ingredients, B.V.	Netherlands & Belgium	Ingredients
Ebro Premium Food, S.A.S.	India	Rice
Ebrofrost Denmark A/S	Germany	Rice and pasta
Ebrofrost Germany, GmbH	Germany	Rice and pasta
Ebrofrost UK, Ltd	United Kingdom	Rice and pasta
Ebrofrost North America	United States	Rice and pasta
Euryza, GmbH	Germany	Rice
Geovita Functional Ingredients, S.R.L.	Italy	Ingredients
Herba Bangkok, S.L.	Thailand	Rice
Herba Cambodia, Co. Ltd	Cambodia	Rice
Herba Ricemills, S.L.U.	Spain	Rice
Indo European Foods Ltd.	United Kingdom	Rice
La Loma Alimentos, S.A.	Argentina	Rice
Lustucru Frais, S.A.S.	France	Fresh pasta
Lustucru Riz, S.A.S.	France	Rice
Mundi Riso, S.R.L.	Italy	Rice
Mundi Riz, S.A.	Morocco	Rice
Neofarms Bio, S.A.	Argentina	Rice
Pastificio Lucio Garofalo, Spa	Italy	Pasta
Riceland Magyarorzag, Kft	Hungary	Rice
Riviana Foods, Inc.	United States	Rice
Riviana Foods Canada Corporation	Canada	Fresh pasta
Santa Rita Harinas, S.L.U.	Spain	Flours
S&B Herba Foods, Ltd.	United Kingdom	Rice
Tilda, Ltd.	United Kingdom	Rice
Transimpex, GmbH	Germany	Rice

List of industrial facilities (production plants and warehouses) and offices of the Ebro Group

Company	Country	Workplace	Type of facility
Arotz Foods, S.A.	Spain	Navaleno	Industrial
Arrozeiras Mundiarroz	Portugal	Coruche	Industrial
		Lisbon	Office (lease)
Bertagni 1882, S.P.A.	Italy	Vicenza	Industrial
		Avio	Industrial
		Avio (ex Le Cont)	Warehouses
		Avio (ex Ginos)	
		Arcugnano (ex Campagnolo)	
Arcugnano (via Fermi)			
Ebro Foods Belgium, N.V.	Belgium	Merksem (plant A)	Industrial
Ebro Foods, S.A.	Spain	Madrid	Offices (lease)
		Barcelona	
		Granada	
Ebro Foods Netherlands BV	Netherlands	Wormer	Industrial
Ebro India, Private Ltd.	India	Taraori	Industrial
Ebrofrost Denmark, A/S	Denmark	Orbaek	Industrial
Ebrofrost Germany, GmbH	Germany	Offingen	Industrial
Ebrofrost North America	United States	Memphis	Industrial
Ebrofrost UK, Ltd	United Kingdom	Beckley	Industrial
Euryza, GmbH	Germany	Hamburg	Office (lease)
Geovita Functional Ingredients, S.R.L.	Italy	Bruno	Industrial
		Nizza Monferrato	Industrial
		Verona	Industrial
		Villanova Monferrato	Industrial
Herba Bangkok, S.L.	Thailand	Nong Khae	Industrial
Herba Cambodia, Co. Ltd	Cambodia	Phnom Phen	Industrial
Ebro Ingredients, B.V.	Belgium	Plant B	Industrial
		Plant F	Industrial
		Plant C	Industrial
		Plant E	Warehouse
		Beernem	Office (lease)
	Netherlands	Plant D	Industrial
Herba Ricemills, S.L.U.	Spain	San Juan de Aznalfarache	Industrial
		Jerez de la Frontera	Industrial
		Coria del Río	Industrial
		Isla Mayor	Industrial
		Silla	Industrial
		Algemés	Industrial
		L'Aldea	Industrial

Company	Country	Workplace	Type of facility
		La Rinconada	Industrial
		Los Palacios	Industrial
		Cotemsa	Warehouses
		Raza	
		Ecorub	
Indo European Foods Ltd.	United Kingdom	Felixstowe	Industrial
La Loma Alimentos, S.A.	Argentina	Los Charrúas	Industrial
		Chajarí	Industrial
		Los Conquistadores	Industrial
		Buenos Aires	Office (lease)
Lustucru Frais, S.A.S.	France	St Genis Laval	Industrial
		Lorette	Industrial
		Communay	Industrial
		Communay	Warehouse
Ebro Premium	France	Lyon	Office (owned)
Mundi Riz, S.A.	Morocco	Larache	Industrial
Mundi Riso, S.R.L.	Italy	Vercelli	Industrial
Neofarms BIO, S.A.	Argentina	Concordia	Office (lease)
Pastificio Lucio Garofalo, Spa	Italy	Gagnano	Industrial
Riceland Magyarorzag, Kft	Hungary	Budapest	Office (lease)
Riviana Foods Canada	Canada	Delta	Industrial
		Hamilton	Industrial
Riviana Foods	United States	Memphis	Industrial
		Carlisle	Industrial
		Brinkley	Industrial
		Hazen	Industrial
		Clearbrook	Industrial
		Freeport	Industrial
		Alvin	Industrial
		Colusa	Industrial
Woodland	Industrial		
S&B Herba Foods, Ltd.	United Kingdom	Fullbourn	Industrial
		Regent	Industrial
		Orpington	Office (lease)
Santa Rita Harinas, S.L.U.	Spain	Loranca de Tajuña	Industrial
Tilda, Ltd.	United Kingdom	Classic	Industrial
		Jazz	Industrial
Transimpex, Gmbh	Germany	Lambsheim	Industrial
		Lambsheim	Office (owned)

ANNEX 2

List of Food Safety and Quality certifications of the Group's subsidiaries

Company	Country	Workplace	Certification
Arotz Food	Spain	Navaleno	IFS
			CAEE
Arrozeiras Mundiarroz	Portugal	Coruche	ISO 9001
			IFS
Bertagni 1882	Italy	Avio	BRC
			MSC
			ASC
			ORGANIC CERTIFICATION
	Arcugnano	IFS	
		ORGANIC CERTIFICATION	
		BRC	
		VQIP	
Ebro Foods Belgium	Belgium	Merksem	IFS
			KOSHER
			FEED CHAIN ALLIANCE (FCA)
			ORGANIC CERTIFICATION
Ebro Foods Netherlands	Netherlands	Wormer	ORGANIC CERTIFICATION
			IFS
			GMP +
Ebrofrost Denmark	Denmark	Orbaek	ORGANIC CERTIFICATION
			KOSHER
			BRC
Ebrofrost Germany	Germany	Offingen	BRC
			HALAL
			KAT
			ORGANIC CERTIFICATION
Ebrofrost UK	United Kingdom	Beckley	BRC
Ebrofrost North America	United States	Memphis	BRC
			ORGANIC CERTIFICATION
			HALAL
			KOSHER
Ebro India	India	Taraori	ORGANIC CERTIFICATION (organic paddy rice crop)
			ORGANIC CERTIFICATION (organic rice processing)

Company	Country	Workplace	Certification		
			BRC		
			IPQC		
			PPQS CHINA		
			PPQS USA		
			HALAL		
Geovita Functional Ingredients	Italy	Bruno	BCR		
			ORGANIC CERTIFICATION		
			KOSHER		
			IFS		
		Villanova Monferrato	HALAL		
			BRC		
			IFS		
			HALAL		
			ORGANIC CERTIFICATION		
Harinas Santa Rita	Spain	Loranca De Tajuña	IFS		
Herba Bangkok	Thailand	Saraburi	ISO 9001		
			BRC		
			ORGANIC CERTIFICATION (EU)		
			ORGANIC CERTIFICATION (USA)		
			HALAL		
			KOSHER		
			GMP & HACCP		
			ORGANIC CERTIFICATION NATURLAND		
			VQIP		
			GLUTEN FREE CERTIFICATION		
Herba Cambodia	Cambodia	Phnom Phen	ORGANIC CERTIFICATION (EU)		
			BRC		
			ORGANIC CERTIFICATION (USA)		
			KOSHER		
			VQIP		
Herba Ingredients	Belgium	Schoten (plant B)	IFS FOOD		
			GMP +		
		Schoten (plant C)	IFS FOOD		
			GMP +		
			ECOLOGICAL CERTIFICATION (EU)		
					IFS FOOD

Company	Country	Workplace	Certification
		Schoten (plant F)	GMP +
			ECOLOGICAL CERTIFICATION (CHINA)
	Netherlands	Wormer	IFS
			GMP +
			KOSHER
			HALAL
			ORGANIC CERTIFICATION (EU)
			ORGANIC CERTIFICATION (CHINA)
ORGANIC CERTIFICATION NATURLAND			
Herba Ricemills	Spain	Coria del Río	IFS
			ISO 9001
			ECOLOGICAL CERTIFICATION
			ECOLOGICAL CERTIFICATION (USA)
			KOSHER
		San Juan de Aznafarache	ISO 9001
			BRC
			IFS
			ECOLOGICAL CERTIFICATION
			ECOLOGICAL CERTIFICATION (USA)
			KOSHER
		Jerez de la Frontera	ISO 9001
			IFS
			ECOLOGICAL CERTIFICATION
			ECOLOGICAL CERTIFICATION (USA)
			BRC
		Silla	IFS
			KOSHER
			ISO 9001
			BRC
		Algemesí (ready foods plant)	ISO 9001
			IFS
			BRC
		Algemesí (rice plant)	ISO 9001
			KOSHER
		Algemesí (flour mill)	IFS
			ISO 9001

Company	Country	Workplace	Certification
			KOSHER
		La Rinconada	KOSHER
			ECOLOGICAL CERTIFICATION
		Isla Mayor	ECOLOGICAL CERTIFICATION (USA)
		Los Palacios	IFS
			ISO 9001
			ECOLOGICAL CERTIFICATION
			ECOLOGICAL CERTIFICATION (USA)
		KOSHER	
Indo European Foods	United Kingdom	Felxtowe	BRC
			FEMAS
La Loma Alimentos	Argentina	Los Charrúas	HACCP
			GLUTEN FREE CERTIFICATION
			GMP + HACCP
			VQIP
			KOSHER
		Chajarí	KOSHER
			HACCP
			VQIP
			GMP + HACCP
			GLUTEN FREE CERTIFICATION
Lustucru Frais	France	Saint Genis Laval	IFS
		Lorette	IFS
		Communay	IFS
			ECOLOGICAL CERTIFICATION
Mundi Riso	Italy	Vercelli	IFS
			BRC
			ECOLOGICAL CERTIFICATION (EU)
			FSSC 22000
			KOSHER
Mundi Riz	Morocco	Larache	ISO 22000
Neofarms Bio	Argentina	Entre Ríos	ECOLOGICAL CERTIFICATION (CHINA)
			KOSHER
			ECOLOGICAL CERTIFICATION (JAPAN)
			ECOLOGICAL CERTIFICATION (USA)
			GLUTEN FREE CERTIFICATION

Company	Country	Workplace	Certification
Pastificio Lucio Garofalo	Italy	Gragnano	BRC
			IFS
			VQIP
			VEGAN
			KOSHER
			HALAL
			ECOLOGICAL CERTIFICATION
			NO-GMO
Riviana Foods Canada	Canada	Delta	BRC
		Hamilton	BRC
Riviana Foods USA	United States	Memphis	KOSHER
			SQF
			HALAL
			ECOLOGICAL CERTIFICATION
			GLUTEN FREE CERTIFICATION
		Brinkley	SQF
			KOSHER
			GLUTEN FREE CERTIFICATION
			HALAL
			ECOLOGICAL CERTIFICATION
		Clearbrook	KOSHER
			ECOLOGICAL CERTIFICATION
			GLUTEN FREE CERTIFICATION
			SQF
		Alvin	KOSHER
			SQF
			GLUTEN FREE CERTIFICATION
			ECOLOGICAL CERTIFICATION
		Carlisle	KOSHER
			ECOLOGICAL CERTIFICATION
			GLUTEN FREE CERTIFICATION
			HALAL
			SQF
		Freeport	KOSHER
			GLUTEN FREE CERTIFICATION
			SQF
		Woodland (InHarvest)	BRC
			ECOLOGICAL CERTIFICATION
KOSHER			

Company	Country	Workplace	Certification
		Colusa (InHarvest)	BRC
			ECOLOGICAL CERTIFICATION
			KOSHER
S&B Herba Foods	UK	Cambridge	BRC
			FEMAS
			KOSHER
		Liverpool	BRC
			KOSHER
Tilda	UK	Rainham (classic site)	BRC
			KOSHER
			FEMAS
		Rainham (Jazz site)	BRC
Transimpex	Germany	Lambsheim	IFS
			ECOLOGICAL CERTIFICATION
			ORGANIC CERTIFICATION NATURLAND

ANNEX 3

Calorific power of fuels, emission factors and water stress classification

Table 1. Net calorific value (NCV) of Fuels

Fuel in Stationary Sources	NCV	Unit NCV	Source NCV
Natural Gas	0.03789	GJ/m ³ N	National GHG Inventory of Spain (Annex 7), based on 2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1)
Liquefied Petroleum Gas (LPG)	0.0473	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1)
Propane	0.0462	GJ/kg	Version 15, June 2020 of the EF document of the Ministry for Ecological Transition and Demographic Challenge (MITERD), based on 2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1)
Liquefied Natural Gas (LNG)	0.0442	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1)
Butane	0.04478	GJ/kg	Version 15, June 2020 of the EF document of the MITERD, based on 2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1)
Gasoline	0.0443	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1)
Diesel	0.043	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1)
Charcoal	0.0295	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1)
Biomass (wood chip)	0.0156	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 & 2)
Biomass (rice husk)	0.0116	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 & 2)
Fuel in Mobile Sources	NCV	Unit NCV	Source NCV
Liquefied Natural Gas (LNG)	0.0442	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 & 3)
Liquefied Petroleum Gas (LPG)	0.0473	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 & 3)
Gasoline	0.0443	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 & 3)
Diesel	0.043	GJ/kg	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 & 3)

Table 2. Emission Factors of fuels and activities

Fuel in Stationary Sources	EF CO _{2e} (kgCO _{2e} /GJ _{NCV})	EF CO ₂ (kgCO ₂ /GJ _{NCV})	EF CH ₄ (kgCH ₄ /GJ _{NCV})	EF N ₂ O (kgN ₂ O/GJ _{NCV})	Unit EF	Source NCV
Natural Gas	56.1545	56.1	0.001	0.0001	kg CO ₂ /GJ _{NCV}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.2)
Liquefied Petroleum Gas (LPG)	63.1545	63.1	0.001	0.0001	kg CO ₂ /GJ _{NCV}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.2)
Propane	63.6000	63.6	0	0	kg CO ₂ /GJ _{NCV}	Version 15, June 2020 of the EF document of the MITERD, based on 2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.2)
Liquefied Natural Gas (LNG)	64.4430	64.2	0.003	0.0006	kg CO ₂ /GJ _{NCV}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.2)
Butane	66.2000	66.2	0	0	kg CO ₂ /GJ _{NCV}	Version 15, June 2020 of the EF document of the MITERD, based on 2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.2)
Gasoline	69.5430	69.3	0.003	0.0006	kg CO ₂ /GJ _{NCV}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.2)
Diesel	74.3430	74.1	0.003	0.0006	kg CO ₂ /GJ _{NCV}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.2)
Charcoal	6.66	0	0.2	0.004	kg CO ₂ /GJ _{NCV}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch. 1 & 2)
Biomass (wood chips)	1.90	0	0.03	0.004	kg CO ₂ /GJ _{NCV}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch. 1 & 2)
Biomass (rice husk)	1.90	0	0.03	0.004	kg CO ₂ /GJ _{NCV}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch. 1 & 2)
Fuel in Mobile Sources	FE CO _{2e} (kgCO _{2e} /GJ _{NCV})	EF CO ₂ (kgCO ₂ /GJ _{NCV})	EF CH ₄ (kgCH ₄ /GJ _{NCV})	EF N ₂ O (kgN ₂ O/GJ _{NCV})	Unit EF	Source NCV

Liquefied Natural Gas (LNG)	59.4710	56.1	0.092	0.003	kg CO ₂ /GJ _{PCI}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 & 3)
Liquefied Petroleum Gas (LPG)	64.8890	63.1	0.062	0.0002	kg CO ₂ /GJ _{PCI}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 & 3)
Gasoline	72.1200	69.3	0.025	0.008	kg CO ₂ /GJ _{PCI}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 & 3)
Diesel	75.2427	74.1	0.0039	0.0039	kg CO ₂ /GJ _{PCI}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 & 3)
Other data on Activity	FE CO₂e (kgCO₂e/GJ_{NVCV})	FE CO₂ (kgCO₂/GJ_{NVCV})	EF CO₂ (kgCO₂/GJ_{NVCV})	EF CH₄ (kgCH₄/GJ_{NVCV})	EF N₂O (kgN₂O/GJ_{NVCV})	Unit EF
Rice crop	33.32	0	1.1900	0	kg CO ₂ /GJ _{PCI}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.4, ch.5) IPCC for fields not flooded for less than 180 days prior to growth, permanently flooded during growth and without organic fertiliser
Elimination of N	2.0821	0	0	0.005	kg CO ₂ /GJ _{PCI}	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.5, ch.6)

Table 3. Emission Factor of biogenic CO₂

Combustible	FE	Unidad FE
Charcoal	112	kg CO ₂ e/GJ
Biomass (wood chips)	112	kg CO ₂ e/GJ
Biomass (rice husk)	100	kg CO ₂ e/GJ

Source: 2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch. 1 & 2)

Table 4. Global Warming Potential of GHG

GHG	GWP	Source GWP
CO ₂	1	IPPC fifth assessment report
CH ₄	28	IPPC fifth assessment report
N ₂ O	265	IPPC fifth assessment report

Table 5. Emission Factor Electricity (based on location)

Country	EF	Unit EF	Source EF
Spain	0.2580	kgCO2e/kWh	Emission factors, Registration of Carbon Footprint, CO2 Offset and Absorption Projects. MITERD. July 2022 V. 22
UK	0.19338	kgCO2e/kWh	UK Government GHG Conversion Factors for Company Reporting. DEFRA 2022
France	0.0569	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME
Germany	0.4610	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
Argentina	0.3670	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
Belgium	0.2200	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
Cambodia	0.8040	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
Canada	0.1860	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
Denmark	0.3600	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
UAE	0.5980	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
USA	0.5620	kgCO2e/kWh	US EPA. Household Carbon Footprint Calculator
Morocco	0.7180	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
Netherlands	0.4150	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
Portugal	0.2550	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
Romania	0.4990	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
Hungary	0.3170	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency
India	0.9120	kgCO2e/kWh	Centre de ressources sur les bilans de gaz a effet de serre. Base Carbone. ADEME. International Energy Agency

Italy	0.4060	kgCO ₂ e/kWh	Centre de ressources sur les bilans de gaz à effet de serre. Base Carbone. ADEME. International Energy Agency
Thailand	0.5130	kgCO ₂ e/kWh	Centre de ressources sur les bilans de gaz à effet de serre. Base Carbone. ADEME. International Energy Agency
Steam or heat purchased and consumed	0.17073	kgCO ₂ e/kWh	UK Government GHG Conversion Factors for Company Reporting. DEFRA 2022
Cooling purchased and consumed	0.12	kgCO ₂ e/kWh	Centre de ressources sur les bilans de gaz à effet de serre 2021. Base Carbone. ADEME.

Table 6. Emission Factors of Coolants

Name of Coolant	EF (kgCO ₂ e/kg)
Carbon Dioxide	1
Desflurane	1,790
Hexafluoroethane	11,100
HFC-125	3,170
HFC-134	1,120
HFC-134a	1,300
HFC-143	328
HFC-143a	4,800
HFC-152	16
HFC-152a	138
HFC-161	4
HFC-227ea	3,350
HFC-23	12,400
HFC-236cb	1,210
HFC-236ea	1,330
HFC-236fa	8,060
HFC-245ca	716
HFC-245fa	858
HFC-32	677
HFC-365mfc	804
HFC-41	116
HFC-43-10mee	1,650
Isoflurane	491
Methane	28
Nitrogen trifluoride	16,100
Nitrous oxide	265
Octafluoropropane	8,900

Name of Coolant	EF (kgCO ₂ e/kg)
Perfluorobutane (PFC-31-10)	9,200
Perfluorocyclobutane (PFC-318)	9,540
Perfluoroethane (PFC-116)	11,100
Perfluorohexane (PFC-51-14)	7,910
Perfluoromethane (PFC-14)	6,630
Perfluoropentane (PFC-41-12)	8,550
Perfluoropropane (PFC-218)	8,900
R-403A	2,520
R-404A	3,943
R-407A	1,923
R-407B	2,547
R-407C	1,624
R-407F	1,674
R-408A	2,650
R-410A	1,924
R-410B	2,048
R-413A	1,945
R-417A	2,127
R-417B	2,742
R-422A	2,847
R-422D	2,473
R-424A	2,212
R-426A	1,371
R-427A	2,024
R-428A	3,417
R-434A	3,075
R-437A	1,639
R-438A	2,059
R-442A	1,754
R-448A	1,387
R-449A	1,282
R-452A	1,945
R-453A	1,636
R-507A	3,985
R-508B	11,850
Sevoflurane	216
Sulphur hexafluoride	23,500

Source: IPCC Fifth Assessment Report

Table 7. Emission Factors of Pollutants NOx, CO, SOx, COV, PM

		STATIONARY COMBUSTION		
GJ		Natural Gas+LNG+LPG+Butane+Propane	Gasoline+Diesel	Rice husk +Wood chips +Charcoal
Pollutant		FC (g/GJ)	FC (g/GJ)	FC (g/GJ)
NOX		74	513	91
CO		29	66	570
COV		23	25	300
SOx		0.67	47	11
PM10		0.78	20	143
PM2.5		0.78	20	140

		MOBILE COMBUSTION			
GJ		Gasoline	Diesel	LPG, Propane & Butane	LNG
Pollutant		FC (g/GJ)	FC (g/GJ)	FC (g/GJ)	FC (g/GJ)
CO		1,911.96	77.44	1,790.70	128.96
COV		226.86	16.28	288.37	5.88
NOX		197.07	301.40	321.35	294.12
PM		0.68	25.58		49.77

Source: European Environment Agency (EMEP)

<https://www.eea.europa.eu/publications/emep-eea-guidebook-2019/part-b-sectoral-guidance-chapters> [eea.europa.eu]

Table 8. Rice Crop Emission Factor

EF CH4 (kg/Ha/day)	Source NCV
1.19	2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.4, ch.5) IPCC for fields not flooded for less than 180 days prior to growth, permanently flooded during growth and without organic fertiliser

Table 9. Water stress classification (World Resources Institute)

Country	Water Stress Classification (World Resources Institute)
Argentina	Low-Medium
Belgium	High
Cambodia	Low
Canada	Low
Denmark	Medium-High
France	Medium-High
Germany	Medium-High
Hungary	Low
India	Extremely High
Italy	High
Morocco	High
Netherlands	Low-Medium
Portugal	High
Romania	Low-Medium
Spain	High
Thailand	Medium-High
United Arab Emirates	Extremely High
United Kingdom	Low-Medium
United States	Low-Medium

ANNEX 4

Index of contents required by Act 11/2018 of 28 December amending the Commercial Code, the recast Corporate Enterprises Act approved by Legislative Royal Decree 1/2010 of 2 July, and the Audit Act 22/2015 of 20 July, regarding the disclosure of non-financial and diversity information

General areas

Area		Reporting framework	Reference (Section)	Comments / Reason for omission
Business model	Description of the business model:	GRI 2-1 Organizational details	P.5-12	
	Business environment	GRI 2-2 Entities included in the organization's sustainability reporting		
	Organisation and structure	GRI 2-6 Activities, value chain and other business relationships		
	Markets in which it operates	GRI 2-9 Governance structure and composition		
	Objectives and strategies	GRI 2-23 Policy commitments		
Policies and results of the policies	Description of the policies applied by the group and the results of those policies, including the key indicators of the relevant non-financial results	GRI 2-23 Policy commitments	P.13-22	
		GRI 2-24 Embedding policy commitments		
Principal risks and impacts identified	The main risks related with those issues linked to the group's activities, including, where necessary and proportional, its commercial relations, products or services that may have an adverse effect on those areas	GRI 3-3 Management of material topics	P.23-29	

Environmental aspects

Area		Reporting framework	Reference	Comments / Reason for omission
Environmental management	Existing and foreseeable effects of the company's activities	Internal framework: internal procedures, Code of Conduct, GRI 2-27	P. 73 - 74	
	Environmental certification or assessment procedures	ISO 14001	P. 95	
	Resources employed for preventing environmental risks	Internal framework: Accounting	P. 95 - 96	
	Application of the precautionary principle	Internal framework: Code of conduct, sustainability environmental and CSR policy	P. 74	
	Quantity of provisions and guarantees for environmental risks	Internal framework: Insurance policy for third-party liability and accidental pollution damage	P. 95	
Pollution	Measures to prevent, reduce or remedy carbon emissions (including noise and light pollution)	Internal framework: Sustainability Plan HEADING FOR 2030, sustainability programmes	P. 83 – 90	
		GRI 305-5	P.14 - 16	

		GRI 3-3 Management of material topics		
Circular economy and waste management and prevention	Measures for waste prevention, recycling, reuse and other forms of recovery and elimination	GRI 306-3 GRI 3-3 Management of material topics	P. 90 - 94 P.14 - 16	
	Actions to combat food waste	Internal framework: 1) AECOC programme 2) Donations to food banks GRI 3-3 Management of material topics	P. 91 - 92 P. 42 - 43 P.14 - 16	
Sustainable use of resources	Water consumption and water supply within local limits	GRI 303-1, 303-2, 303-3, 303-4 & 303-5	P. 78 - 80	
	Consumption of raw materials	GRI 301-1, 301-2	P. 74 - 76	
	Direct and indirect energy consumption	GRI 302-1, 302-2, 302-3, 302-4	P. 76 - 79	
	Measures implemented to enhance energy efficiency	GRI 302-4	P. 78 - 79	
	Use of renewable energies	GRI 302-1	P. 77 - 78	
Climate change	Important elements of the GHG emissions generated	GRI 305-1, 305-2, 305-3	P. 86 - 90	
	Measures taken to adapt to the consequences of climate change	1) Sustainable agriculture projects 2) Circularity measures 3) Climate change risks GRI 3-3 Management of material topics	P. 83 - 86 P. 90 - 92 P. 23 - 29 P.14 - 16	
	Reduction goals established voluntarily	GRI 305-3 Internal framework: Reduction of scope 3 emissions (logistics, rice crop) GRI 305-5	P.87 P. 88 - 89	
Protection of biodiversity	Measures taken to preserve or restore biodiversity	GRI 304-1, 304-2 & 304-3	P.14 – 16 P. 82	
	Impacts caused by activities or operations in protected areas	GRI 3-3 Management of material topics Internal framework: CSR internal reporting tool		

Social and labour aspects

	Area	Reporting framework	Reference	Comments / Reason for omission
Employment	Total number and distribution of employees by gender, age, country and professional category	Internal framework: Quantitative information of the CSR tool	P.48 - 49	
	Total number and distribution of types of employment contract		P. 50	
	Annual average of permanent, temporary and part-time contracts by gender, age and professional category	Internal framework: Quantitative information of the CSR tool	P. 50 - 51	
	Number of dismissals by gender, age and professional category	Internal framework: Quantitative information of the CSR tool	P. 52	
	Pay gap	Internal framework: Calculated with the following formula: (Average pay Men –	P. 63	

Area		Reporting framework	Reference	Comments / Reason for omission
		Average pay Women)/ Average pay Men		
	Average remuneration by gender, age and professional category	Internal framework: Average remuneration (including total remuneration for the year, fixed remuneration and all variable remunerations (attendance fees, etc.) obtained during the year	P. 62 - 63	
	Average remuneration of directors by gender		P. 63 - 64	
	Average remuneration of executives by gender		P. 62	
	Implementation of policies on disconnection from work	Internal framework: Management of material topics	P. 57	
	Employees with disability	Internal framework: Quantitative information of the CSR tool	P. 61 - 62	
Organisation of work	Organisation of working time	Internal framework: Management of material topics	P. 52	
	Number of hours absenteeism	Internal framework: Absentee rate	P. 52	
	Measures to facilitate work-life balance and responsible joint exercise of those measures by both parents	Internal framework: Management of material topics	P. 57 - 58	
Health and safety	Conditions of health and safety at work	Internal framework: Management system for health and safety at work GRI 3-3 Management of material topics	P. 58 – 59 P.14 - 16	
	Number of occupational injuries and disease by gender, frequency rate and severity by gender	Internal framework: Work-related injuries Frequency rate = (total no. lost-time injuries / total no. hours worked) x1000000 Severity rate = (no. lost days due to work-related injuries / total no. hours worked) x1000 GRI 3-3 Management of material topics	P. 58 – 59 P.14 - 16	
Labour relations	Organisation of social dialogue	GRI 3-3 Management of material topics	P.14 - 16	
	Percentage of employees covered by collective agreements by country	GRI 2-30 Collective agreements	P. 59 – 60	
	Balance of collective agreements, particularly in the area of health and safety at work	Internal framework: Quantitative information of the CSR tool	P. 58 - 60	
	Mechanisms and procedures that the company has to promote employee engagement in the management of the company, in terms of information, consultation and participation	Internal framework: Focus on participation of stakeholders	P. 58 - 60	
Training	Policies implemented in the training area	Internal framework: 1) Corporate Code of Conduct 2) Internal CSR Reporting tool	P. 60	

Area		Reporting framework	Reference	Comments / Reason for omission
		GRI 3-3 Management of material topics	P.14 – 16	
	Total hours training by professional category	Internal framework: Quantitative information of the CSR tool GRI 3-3 Management of material topics	P.14 - 16	
Universal accessibility by persons with disability		Internal framework: Qualitative description of the universal accessibility measures for persons with disability	P. 62	
Equality	Measures implemented to promote equal treatment and opportunities between women and men	Internal framework: 1) Corporate Code of Conduct 2) Internal CSR Reporting tool	P. 60 – 61	
	Equality plans Measures taken to promote employment, protocols against sexual and gender-related harassment	Internal framework: 1) Corporate Code of Conduct 2) Internal CSR Reporting tool	P. 60 – 61	
	Integration and universal accessibility of persons with different abilities	Internal framework: Qualitative description of the universal accessibility measures for persons with disability	P. 62	
	Policy against all forms of discrimination and, where appropriate, diversity management	Internal framework: 1) Corporate Code of Conduct 2) Internal CSR Reporting tool GRI 3-3 Management of material topics	P. 60 – 61 P.14 - 16	

Information on respect for human rights

Area	Reporting framework	Reference	Comments / Reason for omission
Application of due diligence procedures in respect of human rights	GRI 2-26 Mechanisms for seeking advice and raising concerns GRI 3-3 Management of material topics	P. 30 – 34 P.14 - 16	
Prevention of the risks of violating human rights and, where necessary, measures to mitigate, manage and redress possible abuse committed	GRI 3-3 Management of material topics GRI 2-23 Policy commitments GRI 2-26 Mechanisms for seeking advice and raising concerns	P.14 - 16 P. 30 – 34	

Complaints of violation of human rights	Internal framework: Quantitative information on the number of complaints GRI 3-3 Management of material topics	P. 34 P.14 - 16	
Promotion and compliance with the ILO fundamental conventions related with respect for the freedom of association and right to collective bargaining, elimination of discrimination in employment and occupation, elimination of forced or mandatory labour and effective abolition of child labour	Internal framework: Corporate Code of Conduct GRI 3-3 Management of material topics	P. 30 P.14 - 16	

Information on anti-corruption and bribery

Area	Reporting framework	Reference	Comments / Reason for omission
Anti-corruption and bribery measures	GRI 2-23 Policy commitments GRI 2-25 Processes to remediate negative impacts GRI 2-26 Mechanisms for seeking advice and raising concerns	P. 35 - 37	
Anti-money laundering measures	GRI 2-23 Policy commitments GRI 2-25 Processes to remediate negative impacts GRI 2-26 Mechanisms for seeking advice and raising concerns	P. 37 - 38	
Contributions to foundations and not-for-profit entities	GRI 201-1 Direct economic value generated and distributed	P. 39 - 46	

Information on the company

Area	Reporting framework	Reference	Comments / Reason for omission
Company's commitments to sustainable development	Internal framework: Qualitative description of the company's impact on employment and local development GRI 3-3 Management of material topics	P. 39 - 46	
	Internal framework: CSR internal reporting tool GRI 3-3 Management of material topics	P. 39 - 46	
	Internal framework: Qualitative description of the relations with local communities GRI 3-3 Management of material topics	P. 39 - 46	
	GRI 3-3 Management of material topics GRI 2-28 Membership associations	P. 39 - 46	

		Internal framework: Description of association or sponsorship actions		
Outsourcing and suppliers	Inclusion in the procurement policy of social, gender equality and environmental issues	Internal framework: Supplier Code of Conduct CSR internal reporting tool GRI 3-3 Management of material topics	P. 69 - 72	
	Consideration in relations with suppliers and subcontractors of their social and environmental responsibility			
	Supervision and audit systems and results			
Consumers	Measures to guarantee consumer health and safety	Internal framework: Qualitative description of the measures for consumer health and safety GRI 3-3 Management of material topics	P. 65 – 66 Annex 2	
	Grievance systems	GRI 2-16 Communication of critical concerns GRI 2-25 Processes to remediate negative impacts	P. 66 – 67	
	Complaints received and solution provided	GRI 2-25 Processes to remediate negative impacts Internal framework : Information on complaints and opportunities for improvement	P. 67 – 68	
Tax information	Profit obtained, country by country	Internal framework: Tax and Finance Department		
	Corporate income tax paid	Internal framework: Tax and Finance Department		
	Government grants received	Internal framework: Tax and Finance Department		