



# NON-FINANCIAL AND SUSTAINABILITY **INFORMATION STATEMENT**

2024  
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## ESRS 2

# GENERAL DISCLOSURES

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### BP – 1. General basis for preparation of the sustainability statement

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\*(5a, 5b, 5c, 5d)

This Sustainability Statement (the “**Statement**”) incorporates the non-financial statement of Ebro Foods, S.A. (the “**Company**”) and is part of the Management Report on the Consolidated Annual Accounts of the Company, as parent of the Ebro multinational group (the “**Ebro Group**” or the “**Group**”).

The Statement: (i) covers the global operations of the Group throughout its entire value chain, (ii) includes information on all the subsidiaries that currently perform the main businesses of the Ebro Group and their respective industrial facilities (see Annex 5.6) and (iii) covers the same scope of consolidation as the Financial Statements of Ebro Foods, S.A. at 31 December 2024. Where the scope of information reported for certain indicators does not cover all the undertakings in the consolidation, this is specifically stated.

The purpose of this Statement is to give our stakeholders a true and fair view of the most important social, environmental and governance aspects and our commitments, practices and results for 2024. To do this, we have identified all the activities in the Group’s upstream and downstream value chain with a view to determining all incidents and impacts that may be associated with our business activities.

As stipulated in the guidelines set out in the Corporate Sustainability Reporting Directive (CSRD), the Statement contemplates the social, environmental and governance factors that are material for the Ebro Group and it has been prepared, in all significant aspects, in accordance with the provisions of **Directive (EU) 2022/2464 of 14 December 2022 as regards Corporate Sustainability Reporting** (CSRD). Therefore, this Statement has been prepared in accordance with the disclosure requirements established in the CSRD standards developed by the European Financial Reporting Advisory Group (EFRAG). This directive aims to standardise the sustainability information disclosed by undertakings, putting this information on a par with the financial information and meeting the information needs of the different stakeholders.

Since that legislation had not been transposed into Spanish law before 31 December 2024, the Statement contains a final appendix with the information corresponding to the ESG (environmental, social and governance) disclosures required under the Spanish **Non-Financial and Diversity Reporting Act 11/2018**.

Moreover, the EU Taxonomy Regulation (Regulation (EU) 2020/852) establishes in Article 8 the obligation to disclose how and to what extent the undertaking’s activities are associated with economic activities that qualify as environmentally sustainable, and the proportion of their turnover, capital expenditure and operating expenditure derived from products or services associated with those sustainable activities. This regulation is binding for certain undertakings, including the Ebro Group, which consolidates the presentation of this information in the section European Taxonomy of Sustainable Activities within Chapter 2 / section Environmental Disclosures.

In this Statement, Ebro Foods has exercised the option to disclose only partially the specific information related with intellectual property, know-how or the results of innovation, which is an essential asset in its value added strategy and a key aspect for strengthening its competitive edge. Apart from this partial omission, all the other information that is important to provide a full, transparent view of the Group's performance in its respective material impacts, risks and opportunities has been disclosed.

The Ebro Group has not applied the exemption from disclosure of information relating to impending developments or matters in the course of negotiation under Article 19a(3) and Article 29a(3) of Directive 2013/34/EU.

This Statement has been drawn up taking into account the material sustainability matters connected with the Group's own operations and our upstream and downstream value chain. The policies, actions and targets described within the document also include value chain information.

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## BP – 2. Disclosures in relation to specific circumstances

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\*(9, 10, 11)

### DEFINITION OF TIME HORIZONS

With regard to the disclosure of definitions of medium- or long-term time horizons, the double materiality assessment (DMA) of the Ebro Group made in 2024 used a different definition of time horizons from that established by the CSRD. In our DMA, medium-term is defined as "within the next three years", as opposed to the five years stipulated by the CSRD, while long-term is considered "at more than three years", rather than the five years established in the CSRD. This difference is due to the need to align the analysis with the Group's financial planning and corporate business strategy, which establishes three-year cycles for development of its different strategic plans.

Similarly, the Ebro Foods analysis of climate-related risks and opportunities made in 2023 in line with the recommendations of the **Task Force on Climate-Related Financial Disclosures** (TCFD) was based on the climate scenarios developed by the **Intergovernmental Panel on Climate Change** (IPCC), using time horizons that deviated from those stipulated in the CSRD.

### METRICS

This Statement contemplates certain metrics, analysed for all the value chain activities, relating to measurement of Carbon Footprint Scope 3 emissions, the quantification of which involves a certain degree of inherent uncertainty, as they were obtained from estimates instead of direct measurements. The same is true of long-term projections of climate scenarios, due to the complexity and variability of the factors included in their calculation. For this reason, the Group does not anticipate any short-term changes in the measurement system used for those metrics.

The information on the sustainability indicators reported is obtained from primary data provided through the Group's subsidiaries. When no original data are available, estimates are used, notably with regard to certain Environment Datapoints. These estimates are used whenever there is a reliable source of information recognised by the sector or experts in the matter and provided the estimated information meets the qualitative criteria established in ESRS 1. Explanations regarding the methodologies and/or the scope of the information disclosed have been provided wherever required.

For indicators in which there have been changes in the quantification methods since the previous report, or in which the disclosure or presentation format has been altered, a brief explanation is included with the corresponding indicator. The Company has also revised the methodology for calculating several metrics with a view to making them more precise and bringing them into line with the best practice in the sector.



The historic values of the indicators presented may suffer changes due to updates of the methodologies or other circumstances, which might affect the sources of information and their subsequent disclosure in the Statement. If those modifications are due to the correction of inaccuracies in earlier reports, this is explicitly stated together with the corresponding metric or value, indicating the nature of those corrections.

There are numerous cross-references in different sections of this Statement. Some refer to public content and additional references are included that are beyond the remit of the external audit.

## ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES AND INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

\*(GOV-1 21, 22 & 23) (GOV-2, 26)

### Information on the composition of the Board of Directors and its Committees

The following table contains details of the composition of the Board of Directors and categories of Directors, and the Committees they were on at year-end 2024 (information as at 31.12.2024):

DIRECTOR (REPRESENTATIVE)	CATEGORY	COMMITTEES THEY ARE ON
Antonio Hernández Callejas Chairman	Executive	Executive Committee (Chair) and Investment and Strategy Committee
Demetrio Carceller Arce Vice-Chairman	Proprietary (Significant shareholder: Sociedad Anónima Damm through Corporación Económica Delta, S.A.)	Executive Committee, Nomination and Remuneration Committee and Investment and Strategy Committee (Chair)
Belén Barreiro Pérez-Pardo <sup>(1)</sup>	Independent	Nomination and Remuneration Committee
María Carceller Arce	Proprietary (Significant shareholder: Sociedad Anónima Damm through Corporación Económica Delta, S.A.)	-----
José Ignacio Comenge Sánchez-Real	Proprietary (Significant shareholder through Mendibea 2002, S.L.)	Investment and Strategy Committee
Corporación Financiera Alba, S.A. (Alejandra Olarra Icaza)	Proprietary (Significant shareholder: Corporación Financiera Alba, S.A.)	-----
Mercedes Costa García Lead Independent Director	Independent	Nomination and Remuneration Committee (Chair) and Audit, Control and Sustainability Committee
Empresas Comerciales e Industriales Valencianas, S.L. (Javier Gómez-Trenor Vergés)	Proprietary (Significant shareholder: Empresas Comerciales e Industriales Valencianas, S.L.)	-----
Javier Fernández Alonso	Proprietary (Significant shareholder: Corporación Financiera Alba, S.A.)	Executive Committee, Audit, Control and Sustainability Committee and Investment and Strategy Committee
Blanca Hernández Rodríguez	Proprietary (Significant shareholder: Grupo Tradifín, S.L.)	Nomination and Remuneration Committee
Félix Hernández Callejas <sup>(2)</sup>	Executive (Significant shareholder: Heralianz Investing Group, S.L.)	Investment and Strategy Committee
Marc Thomas Murtra Millar <sup>(3)</sup>	Independent	Executive Committee and Audit, Control and Sustainability Committee (Chair)



DIRECTOR (REPRESENTATIVE)	CATEGORY	COMMITTEES THEY ARE ON
Elena Segura Quijada <sup>(4)</sup>	Independent	Nomination and Remuneration Committee and Audit, Control and Sustainability Committee
Jordi Xuclà Costa	Proprietary (Significant shareholder: Sociedad Estatal de Participaciones Industriales -SEPI- through Alimentos y Aceites, S.A.)	Audit, Control and Sustainability Committee

- (1) Belén Barreiro Pérez-Pardo was appointed member of the Audit, Control and Sustainability Committee on 28 January 2025 to fill the vacancy produced by the resignation of Marc Thomas Murtra Millar as Director, tendered on 23 January 2025 with effect from 27 January 2025.
- (2) Félix Hernández Callejas was nominated Director by the significant shareholder Heralianz Investing Group, S.L. and is classified as an executive director by virtue of his status as executive in one Group subsidiary and director in another.
- (3) Marc Thomas Murtra Millar stepped down from the Board and the Committees he was on, tendering his resignation on 23 January 2025, with effect from 27 January 2025. The vacancy produced on the Board and Executive Committee by Mr Murtra Millar's resignation had not been filled by the date of issue of this Statement.
- (4) Elena Segura Quijada was appointed Chair of the Audit, Control and Sustainability Committee on 28 January 2025 to fill the vacancy produced by Mr Murtra Millar's resignation.

None of the Directors represent the employees or other workers.

During 2024 the Board had a total of 14 members, coinciding with the number set at the Annual General Meeting of Shareholders held on 29 July 2020.

### Information regarding the classification of Directors

At year-end 2024, the composition of the Board from the point of view of categories of the Directors was as follows:

- \* 2 Directors are classified as executive, equivalent to 0.14% of the 14 members;
- \* 8 Directors are classified as proprietary, equivalent to 57.14% of the 14 members, and
- \* 4 Directors are classified as independent, equivalent to 28.57% of the 14 members.

At the date of issue of this Statement, following the resignation from the Board tendered by Marc Thomas Murtra Millar on 27 January 2025, (i) the number of Independent Directors has fallen from 4 to 3, which is equivalent to 23.08% of 13 members; and (ii) the 8 Proprietary Directors represent 61.54% of 13 members.

### Information regarding the presence of women on the Board of Directors, corporate Committees and in the Group management

At year-end 2024 there were 6 women on the Board of Directors (the gender least represented on this body), equivalent to 42.86% of the total 14 members, of whom:

- \* 3 are classified as independent, so 75% of that category are women; and
- \* 3 are classified as proprietary, so 37.50% of that category are women.

No women were classified as Executive Directors.

At year-end 2024, the numbers of women on the Board Committees were as follows:

- \* 4 women on the Nomination and Remuneration Committee, representing 80% of the total members (5) of this Committee; and
- \* 2 women on the Audit, Control and Sustainability Committee, representing 40% of its total members (5).

There are no women on the Executive Committee or the Investment and Strategy Committee.

Following the incorporation on 28 January 2025 of Belén Barreiro Pérez-Pardo in the Audit, Control and Sustainability Committee to fill the vacancy left by Mr Murtra Millar, the number of women on this Committee rose from 2 to 3, so at the date of issuing this Statement, women represented 60% of the total Committee members.

Finally, of the 10 senior executives of Ebro Foods, S.A. (15 in the entire Ebro Group) 4 are women, representing a proportion of 40% of the top management of the Company and 26% of the Group's top management. In this regard, both the Chief Operating Officer (COO) of the Ebro Group, who is the highest-ranking executive of the Ebro Foods Group after the Executive Chairman, and the heads of the principal departments of Ebro Foods, S.A. are considered "top management" even if their respective employment relationships are not specified as "top management".

### Information regarding diversity of age, expertise and experience in the Board as a whole

The Board of Directors as a whole has proven experience in the following sectors and markets that it considers key to development of the Group's national and international operations: economic, financial, legal, business, industrial, consumer and distribution markets, rice, pasta and ESG.

The different professional profiles of the Directors, as specialists in the aforesaid sectors and markets, together with the in-depth knowledge that some of them have of the Group, give the Board as a whole an ideal composition for efficient functioning, as well as an adequate diversity of expertise and professional experience for the Company and Group interests.

Summaries of the Directors' professional experience can be consulted on the corporate website: <https://www.ebrofoods.es/wp-content/uploads/2025/04/2025.04.30-Professional-profile.pdf>.

Furthermore, in keeping with the underlying principles of the Policy on the Selection of Directors and Diversity in the Composition of the Board of Directors, the age of Directors is a diversity aspect taken into account by the Company. With an average age of 57, the Board has Directors aged between 39 (1 female director) and 74 (2 male directors).

### Information regarding supervision of IROs

The Board of Directors of the Company, as parent of the Group, establishes the general strategic principles and criteria in the area of ESG, approving the general policies and action plans applicable on a Group level.

Based on those strategic principles and criteria, the Corporate Communications and Social Responsibility Department of the Company is responsible for designing and executing the strategy and the action plans to be developed. This department coordinates and holds regular meetings with the people responsible for sustainability in the Group companies to inform them of the actions to be taken in respect of the targets established in the plans approved by the parent's Board of Directors. The plan currently in place is the Sustainability Plan HEADING FOR 2030 (RUMBO A 2030).

The strategy established by the Board of Directors and developed by the Corporate Communications and Social Responsibility Department and the actions taken in the area of Social Responsibility and Sustainability of the Group and in the Non-Financial and Sustainability Statements are monitored and overseen by the Audit, Control and Sustainability Committee of the Company, which reports regularly to the Board of Directors of the Company on that monitoring and, where appropriate, on material aspects in this area.



For this purpose, the Corporate Communications and Social Responsibility Department regularly attends the meetings of the Audit, Control and Sustainability Committee to report on the work done and material aspects of the year. In 2024, the Corporate Communications and Social Responsibility Department attended two Audit, Control and Sustainability Committee meetings to report on: (i) the information on sustainability corresponding to 2023, (ii) the degree of progress within the long-term Sustainability Plan “HEADING FOR 2030” and (iii) the work done during 2024 to adapt equipment and systems to the new reporting requirements in force for 2024.

The monitoring and supervision by the Audit, Control and Sustainability Committee in this area is complemented, as far as risk management is concerned, with the powers exercised by that Committee in risk control and management, which includes risks related with sustainability. In this regard, within its oversight of the Risk Control and Management Policy, the Audit, Control and Sustainability Committee receives regular reports (at least twice a year) on the results of risk control and management work done by the Risks Committee.

The Audit, Control and Sustainability Committee reports to the Board of Directors on all monitoring and oversight and sends it the documentation on Risks Committee meetings.

Apart from the structure described above, the integration of Sustainability within the Group’s corporate governance can be seen in aspects directly related with the administrative tasks performed by the Board of Directors. By way of example, any investment submitted to the Board for approval is accompanied by a financial analysis of the investment (NPV, IRR, pay-back) and an analysis of the non-financial aspects to be considered for its approval.

The Board of Directors of the Company, ultimately responsible for administration of the Group, has established the general principles for actions regarding Sustainability within the Sustainability, Environment and Corporate Social Responsibility Policy. Those principles include, among others: (i) ethical management, (ii) minimising economic, social and environmental risks, (iii) respect for human rights, (iv) ensuring compliance with sustainable standards in the value chain, (v) environmental protection...

Based on those principles, sustainability is integrated in business management through the functions of each link in the structure described above (Sustainability Department, Risks Committee, Audit, Control and Sustainability Committee ...). In accordance with the guidelines established by the Board of Directors in the Sustainability, Environment and Corporate Social Responsibility Policy, the targets related with impacts, risks and opportunities (IROs) are defined by the Corporate Communications and Social Responsibility Department of the parent, in coordination with the sustainability managers in Group companies. Once the targets have been defined, they are incorporated in the annual budgets, the strategic plans (three-year) or specific Sustainability plans (such as the current Long-Term Sustainability Plan “HEADING FOR 2030”).

All in all, impacts, risks and opportunities are an essential element of decision-making in the different bodies, within their respective remits. To give an example of this, at the highest level of power within the Group, the Board of Directors of the Company, which is competent to assess and decide on the most important and strategic investments of the Group, analyses the IROs along with the purely financial aspects of the investments.

During 2024, the Risks Committee, the Audit, Control and Sustainability Committee and the Board of Directors have addressed different aspects related with sustainability, including especially:

- ✱ The new sustainability regulation, analysed by the Audit, Control and Sustainability Committee, which has monitored at its meetings the measures and tasks designed to reduce risks and comply with the new legislation.
- ✱ Aspects related with food safety, such as the measures taken to avoid risks deriving from a non-conformity detected in a commodity supplier.



- ✱ Problems deriving from the COL (cut-off low) (related with fixed assets, inventories, logistics, loss of business activity and/or fulfilment of commitments to customers), which affected the Group's facilities in the Region of Valencia, with a financial impact estimated at 1.8 million at the date of issuing this Statement.

### Competence and expertise to oversee sustainability matters

The administrative, management and supervisory bodies of the Group have the necessary powers to oversee sustainability matters, backed by different mechanisms to guarantee an informed approach.

In this regard, the Board of Directors is made up of Directors with experience in large-cap companies, so they are familiar and up-to-date with the management of sustainability-related impacts, risks and opportunities in contexts with similar requirements to those of the Group. Moreover, the Company promotes training and retraining in this area. Accordingly, the Audit, Control and Sustainability Committee recently organised a training session with the external auditor, open to all Directors, to expand their knowledge of the new regulation applicable and its implications.

Moreover, those responsible for overseeing these matters within the organisation have extensive experience in the management of ESG matters and have received specific training to guarantee adequate governance of material sustainability-related impacts, risks and opportunities. All the Group professionals involved in the different matters contemplated in this Statement have also received specific training in the Group's double materiality assessment and its results, thus ensuring a focus aligned with the applicable reporting standards and corporate business strategy.

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## GOV – 3. Integration of sustainability-related performance in incentive schemes

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\*(29)

The top tier executives of the Group, including the Executive Chairman and the Chief Operating Officer (COO), regularly participate in the different Long-Term Bonus Schemes tied to the Group's different three-year strategic plans.

Commencing with the previous Long-Term Bonus Scheme (tied to the previous Strategic Plan 2022-2024), the remuneration scheme contemplated in that Plan makes part of the bonus subject to meeting non-financial/sustainability-related targets. So, when the Nomination and Remuneration Committee is defining the Long-Term Bonus Scheme, it studies the non-financial/sustainability-related targets included in the strategic plans and selects the ones it considers best suited to material goals and that enable objective measurement as far as possible. These (long-term) targets are incorporated in the Bonus Scheme such that part of the remuneration that the beneficiaries of the scheme (which, as mentioned earlier, are the top tier executives in the Group) might receive is tied to the degree of achievement of those targets over the three-year period. At the end of the corresponding three-year period, after assessment by other Board Committees, the Nomination and Remuneration Committee analyses (together with the other targets) the degree of achievement of the non-financial/sustainability-related targets established in the Scheme and, in view thereof, the bonus accrued by the beneficiaries of the Bonus Scheme in this aspect.

The Long-Term Bonus Scheme in place in 2024 was tied to the Strategic Plan 2022-2024. A detailed description can be found in the Directors' Remuneration Policy and in the Annual Reports on Directors' Remuneration for each year. (<https://www.ebrofoods.es/en/information-for-shareholders-and-investors/corporate-governance/remuneration-of-the-directors/>).

The non-financial/sustainability-related targets established in the Long-Term Bonus Scheme tied to the Strategic Plan 2022-2024 are in the areas of circular economy, climate change mitigation and Human Rights. A 6.25% portion of the bonus for that three-year period is tied to achievement of those targets.

In 2025, at the same time as preparing this Statement, the Nomination and Remuneration Committee is working on the new Long-Term Bonus Scheme tied to the new Strategic Plan 2025-2027, which is expected to maintain broad continuity in the definition of targets. Therefore, under the new Bonus Scheme, part of the remuneration that the beneficiaries might receive is expected to be tied to the achievement of non-financial/sustainability-related targets. Accordingly, when defining the Scheme, the Nomination and Remuneration Committee will determine which of the non-financial/sustainability-related targets included in the Strategic Plan 2025-2027 must be established as targets for remuneration in the Long-Term Bonus Scheme and the percentage of the bonus to be tied to achievement of those targets. One of the criteria to be considered in that selection is the objective assessment of the degree of achievement (since the bonus receivable will depend on it).

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## GOV – 4. Statement on due diligence

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In the Ebro Group, due diligence is conceived as a fundamental process to identify, prevent and mitigate sustainability-related risks throughout our value chain. Although our management of due diligence has traditionally focused on human rights and working conditions in the supply chain, our approach also takes account of environmental and governance aspects, in line with the regulatory frameworks and expectations of its stakeholders.

The Group focus is based on the following principles:

- a) Identification and management of ESG risks:** We assess the human rights, environment and governance-related impacts of our operations and business relationships, paying special attention to the risks within our value chain, such as decent work, health and safety at work and meeting environmental and labour standards in agricultural production.
- b) Proportionate, effective measures:** We take measures adapted to the nature and scale of the risks identified, including audits of suppliers, collaboration with strategic partners and promotion of best practice in our production processes.
- c) Integration in business management:** We incorporate due diligence in the sustainability assessments and supplier selection and supervision processes with the aim of encouraging responsible standards throughout our supply chain.
- d) Remediation of adverse impacts:** We work on identifying possible adverse effects associated with our operations and collaborates with business partners to apply corrective or preventive measures where necessary.
- e) Collaboration with key actors:** We work to international standards in order to strengthen the traceability and sustainability of our raw materials, fostering responsible standards in the food industry.
- f) Transparency and communication:** We report regularly on the Group's actions and progress in respect of sustainability matters, including information on our due diligence processes, audits and continuous improvement plans.

Although the Group does not have a specific sustainability-related due diligence policy, these principles are integrated in its risk management and are part of its sustainability and human rights strategies. Moreover, our initiatives in the value chain are consistent with the applicable international frameworks and sector-specific standards.



## GOV – 5. Risk management and internal controls over sustainability reporting

\*(36)

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 the business risks 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 mapping business risks, through the identification, assessment and grading of risk management capacity to rank risks from greater to lesser impact for the Group and their probability of occurrence, including a time scale. The risk map takes account of measures to mitigate or neutralise the risks identified.

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, such as 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, so the risk level is considered acceptable or tolerable on a corporate level.

All risks are assessed and classified according to a single protocol for all Group subsidiaries under the responsibility of the risk managers, who report at least twice a year to the corporate Risks Committee, made up of the heads of the financial, tax, legal, auditing, sustainability and IT areas and the group Chief Operating Officer.

The Risks Committee reports directly to the Audit, Control and Sustainability Committee. Different sustainability-related aspects have been addressed over the year, particularly including the new regulation on sustainability, aspects associated with food safety and problems deriving from the COL (cut-off low) that affected the Group's facilities in the Region of Valencia.

The risk universe is grouped into five main groups: compliance, operational, strategic, financial and sustainability. They are all sub-divided into a large number of categories. Up to 2024, sustainability-related risks were included within the first four categories, but in the wake of the new sustainability reporting regulations and the double materiality assessment made in response thereto, it has been decided to put them into a separate category, adding a few new risks that were identified during this work.

The most important categories within the main sustainability-related risks identified are:

- ✱ **Climate change.** Risk with growing impacts in the short-, medium- and long-term that can directly affect the performance of our business activity.

The Company completed the work to calculate its carbon footprint (Scope 3) and review Scopes 1 and 2 and has prepared, pending approval: (i) the definition of reduction targets in accordance with the Science Based Targets initiative (SBTi), and (ii) the calculation of the financial effect of the main risks associated with climate change.

A total of thirteen physical and transition risks have been assessed, identified as those having a greater potential to impact the Group's financial statements. The risks associated with growing the main commodities used by the Group and the possibility that changes in the temperatures and/or rain cycles may lead to restrictions in the supply of those products (and, consequently, higher procurement prices) have been classified as moderate, as the Group has a mitigation strategy based on: (i) diversification of its sourcing areas, (ii) multi-location of the production assets, and (iii) improved management of the value chain. These aspects place the Group in a privileged position within the sector.

In any case, the possible impact on the Group's earnings of a possible price hike at source will depend on the Group's capacity to pass those price increases on to its customers based on the differentiation of its brands and products, the quality of its products and services, and innovation.

- \* **Water management and biodiversity.** Dependence on water resources, especially in sourcing areas and in regions with risks of drought, leading to low production yields and/or higher operating costs due to the loss of soil properties, which lower the productivity of the crops. To mitigate this risk, the Group has a multifaceted strategy based on: (i) the management and purification of water resources for own use, (ii) facilities in numerous locations and the use of several sources and types of commodities, and (iii) support to growers to enhance their economic stability and the implementation of sustainable agricultural practices.
- \* **Working conditions and work environment.** Risks related with the ability to attract and retain talent. The Group companies use different pay packages to tie down workers, such as contributions to pension schemes, health schemes, bonus schemes, support for achieving a suitable work-life balance and other benefits adapted to the circumstances of each company. One specific aspect of this is respect for and compliance with human rights and maintaining appropriate ethical standards, as indicated in the Sustainability Plan "Heading for 2030" and the Group's Code of Conduct. To mitigate this risk, the Group conducts random SMETA audits at its own and third-party (supplier) facilities.
- \* **Food safety.** Given the nature of its 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 the countries in which its products are produced and sold. The Group has food safety programmes to identify and control certain critical points (Hazard Analysis and Critical Control Points –HACCP-), so the residual risk is minimal. To mitigate this type of risks, most of the Group's food handling processes have obtained certification by IFS (International Food Safety), SQF (Safe Quality Food) and/or BRC (British Retail Consortium), 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 risk map identifies and assesses the potential financial and non-financial risk events that could affect the Group. The Internal Control over Financial Reporting (ICFR) System identifies the risks that affect the reliability of the financial information based on materiality in respect of the consolidated amounts, and other qualitative criteria (error, fraud, unusual transactions, etc.). Based on these criteria, the Group has determined the companies in the material Business Areas or Divisions that meet any of the criteria mentioned and the material accounting items of each one.

After defining the material items for each company, the processes and sub-processes impacted have been determined with a relationship matrix. For each sub-process identified within the scope, the inherent risks and the controls conducted by those responsible to mitigate them are identified and documented in a Risk-Control Matrix. Those risks take into account all the financial reporting targets (existence and occurrence; integrity; assessment; presentation, disaggregation and comparability; and rights and obligations).

The Group does not have a formal System to Control Non-Financial Information, but it has established an internal protocol to ensure such control, with: (i) segregation of the people responsible for collecting and compiling the information according to the nature thereof, and (ii) several levels of supervision and final approval by those responsible for sustainability-related reporting, including the Non-Financial and Sustainability Statement.

In order to collect and prepare sustainability information, a software tool has been implemented to increase the granularity of the information, process it in different ways and determine its traceability.

In this regard, the Ebro Group publishes annual non-financial and sustainability statements with a view to encouraging its stakeholders to share their non-financial information, giving a true and fair view of their performance in environment, social and governance-related aspects.



## SBM – 1. Strategy, business model and value chain

\*(40a,40b,40e,40f,40g,42)

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 Southeast 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, and sustainable business model.

### BUSINESS MODEL

The Ebro Group operates through a portfolio of 81 brands in more than 60 countries, with industrial and commercial facilities in 16 of them. In the remaining countries, we only engage in commercial activity. Our industrial park comprises some 80 sites, including production plants, offices and warehouses.

#### List of countries with commercial and industrial presence

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

#### List of countries with only commercial presence

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

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 the specific local idiosyncrasies, culture, laws, etc. At a higher level the Company, as parent, with a light, dynamic structure, is responsible for defining the Group's overall strategy and management guidelines. Decision-making is prompted by the Company'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:

- ✱ **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 Southeast Asia through companies in the Herba Group and Lustucru Riz, and in North and Central America, the Caribbean and the Middle East through the Riviana Group.

- ✱ **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 Lustucru Premium 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.

None of the products manufactured and/or sold by the Group is banned on any market.

One of the Group's most valuable assets is its **6,636 professionals, 5,667 of whom are employed directly by the company, 27 are independent contractors** and **942 are contracted** through different external agencies. It is a very close-knit group 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 quality employment while strengthening their skills and abilities, as well as their personal and professional leadership skills.

Table of employees/geographical area/business area

TYPE OF WORKER	No. OF WORKERS
Employees	5,667
Supervised workers	942
Independent contractors	27
<b>Total headcount</b>	<b>6,636</b>

\*Note: The total number of workers provided in this Statement does not coincide with the number indicated in the Consolidated Annual Accounts because some companies do not apply the same reporting criteria.

CONTINENT	TYPE OF WORKER	TOTAL
Africa	Employees	209
	Supervised workers	2
	Independent contractors	0
<b>Africa</b>		<b>211</b>
Asia	Employees	489
	Supervised workers	211
	Independent contractors	6
<b>Asia</b>		<b>706</b>
Europe	Employees	3,446
	Supervised workers	620
	Independent contractors	21
<b>Europe</b>		<b>4,087</b>
North America	Employees	1,302
	Supervised workers	109
	Independent contractors	0
<b>North America</b>		<b>1,411</b>
South America	Employees	222
	Supervised workers	0
	Independent contractors	0
<b>South America</b>		<b>222</b>
<b>Total headcount</b>		<b>6,636</b>

BUSINESS AREA	MEN	WOMEN	TOTAL
Rice	2,885	1,045	3,930
Pasta	1,041	578	1,619
Holding	37	24	61
Others	37	20	57
<b>Total Employees</b>	<b>4,000</b>	<b>1,667</b>	<b>5,667</b>

## VALUE CHAIN

The Ebro Group's value chain gives an integral vision of all the stages of its business activity, from the sourcing of raw materials to final consumption of the product. It is structured in three major stages: upstream (sourcing and logistics), own operations (production, certification and distribution) and downstream (sale and consumption).

In the **upstream value chain**, the Ebro Group does not directly grow the commodities, but buys its principal agricultural raw materials (rice and durum wheat) from growers, cooperatives and millers. To guarantee stable, high-quality supplies, the Group works with strategic growers and suppliers applying quality and sustainability standards in sourcing. As the Group has expanded its product portfolio, it has also broadened these actions: from agricultural raw materials to other ingredients such as potato flakes, pulses, quinoa and "ancient grains". This sourcing stage is completed with the purchase of the auxiliary raw materials that are essential for our production process, packaging materials and other necessary inputs, such as water and energy.

Rice is the grain with the highest global consumption, but its market is conditioned by the production deficit in certain key countries such as China, the Philippines and Indonesia, which curbs its global trade in comparison with other cereals. To guarantee optimum sourcing, the Ebro Group has developed a strategy of geographic diversification embracing four major regions:

1. United States
2. Southern Europe
3. Southeast Asia
4. Argentina

As for durum wheat (to meet the requirements of the premium pasta category), the Group needs to buy this cereal with a high protein content, available on a much smaller market than other varieties used mainly to produce flour. Ebro mainly sources this grain in the United States, Canada and Southern Europe (France, Spain and Italy).

In **own operations**, Ebro transforms the raw materials at its facilities using different production processes, which vary according to the type and purpose of the product. These processes include milling, cleaning, polishing, extrusion, pre-cooking, cooking and freezing, ensuring in all these processes that the highest quality and food safety standards are met.



Consequently, the Group's product portfolio is structured in six main consumption areas:

1. Rice: dry, fresh, frozen, organic, aromatic and others encompassed in the healthy category, such as brown rice.
2. Premium pasta.
3. Fresh pasta and filled pasta.
4. Convenience: "ready-to-serve" rice and pasta dishes.
5. Sauces.
6. Flours and ingredients: natural products based on rice, pulse and ancient grains.

Finally, in the **downstream value chain**, the finished products are distributed through different sales channels, including supermarkets, e-commerce, catering and hospitality businesses and large customers, such as food distribution companies and multinationals in the sector, which use these products (as ingredients) as the basis for their own products. The process ends with purchase of the products by the end consumer, contemplating their experience of use and pre- and post-consumption waste management, thus enhancing the Ebro Group's commitment to sustainability and the circular economy.

Through adequate value chain management, the Group achieves different benefits for its customers and consumers, investors and other stakeholders. Customers and consumers are offered a nutritious, safe, versatile product, adapted to consumer trends and requirements and dietary preferences. For investors, the stability of the staples sector and the Group's ability to innovate and expand to new markets generate confidence in its sustained growth. Moreover, profitability is optimised thanks to the Group's efficient cost and logistics management. For other stakeholders, such as suppliers and distributors, the Group is a reliable partner with an efficient, stable supply chain. For the society at large, the Group's commitment to sustainability and responsible sourcing enhances the positive impact on agricultural communities and the environment.

## INTEGRATION OF SUSTAINABILITY IN THE CORPORATE STRATEGY

Consistent with its commitment to sustainable and responsible business management, the Group aims to integrate sustainability in all its strategic operations and decisions, from the purchase of raw materials to the distribution and sale of its products. At the sourcing stage, it endeavours to guarantee responsible practice in agricultural production, promoting social and environmental standards in its supply chain. During the production process, the Group focuses on energy efficiency, reducing emissions, the circular economy and responsible use of natural resources. In distribution and sale, it strives to improve the sustainability of its packaging and optimise logistics in order to minimise its carbon footprint.

The Group's sustainability initiatives are developed in the main geographical areas in which it operates. In Europe, it concentrates on enhancing the efficiency of its production plants and strengthening its collaboration with local suppliers. In Asia, particularly in India and southeast Asia, it strives to improve the working conditions of the growers in its supply chain, promoting sustainable agricultural practice and respect for workers' rights. In North America, it focuses on product innovation and reducing the environmental impact in its logistics chain. And in South America, specifically Argentina, the Group has a major influence in the social and economic development of the communities in which it is present.

As regards other stakeholders, the Group collaborates actively with suppliers, customers and local communities to foster sustainable practices and generate a positive impact throughout its value chain.

The Sustainability Plan **HEADING FOR 2030** guides the Group's actions throughout its entire value chain: from the field to the table, from production to consumer experience.



HEADING FOR 2030 focuses on three main pillars of action:

- \* **People.** The Group implements specific plans to promote the well-being of our professionals at work, fostering continuous training and skills development to retain talent, seeking ways to balance work and home life, flexibility, equality, inclusion, diversity and health and safety at work. Within this area, the Group also promotes different programmes and initiatives designed to foster respect for human rights, social welfare, equal opportunities, education and social and economic progress in the communities in which we operate.
- \* **Health and well-being.** Thanks to the Group's commitment to health, we offer a broad array of healthy, natural, differentiated products that help consumers to 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 habits and creative eating, through recipes, blogs and advertising campaigns.
- \* **Our planet.** With the aim of preserving and protecting the environment, the Group works actively to minimise the impact of both our production processes and our logistics and sourcing operations. We collaborate with several stakeholders in sustainable agriculture programmes, especially to mitigate and adapt to the effects of climate change. We also make a considerable effort to reduce our carbon footprint by promoting efficient energy measures and the use of green energies and developing different initiatives to guarantee the Group's transition towards a circular economy model, such as the recycling of packaging materials, replacing plastics, management of surplus food stocks and waste recovery.



## 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 the three key areas of sustainability: social, environmental and governance. Through their active participation in these organisations they are able to give greater scope to the actions developed within their CSR strategy and be immersed in a process of continuous learning and improvement.

Some of the important organisations with which the Group collaborates are:

	Signatory of the United Nations Global Compact <a href="http://www.pactomundial.org">www.pactomundial.org</a>
	Member of the Spanish Commercial Coding Association (AECOC) project against food waste "Don't waste food, use it" <a href="http://www.alimentacionsindesperdicio.com/">http://www.alimentacionsindesperdicio.com/</a>
	Member of the SERES Foundation <a href="http://www.fundacionseres.org/Paginas/Inicio.aspx">http://www.fundacionseres.org/Paginas/Inicio.aspx</a>
	Member of Forética <a href="http://www.foretica.org/">http://www.foretica.org/</a>
	Sustainable Agriculture Initiative (SAI) Platform <a href="http://www.saiplatform.org/">http://www.saiplatform.org/</a>
	Sustainable Rice Platform (SRP) <a href="http://www.sustainablerice.org/">http://www.sustainablerice.org/</a>
	Members Ethical Trade Audit, SEDEX <a href="https://www.sedex.com/">https://www.sedex.com/</a>

## SUSTAINABILITY RATINGS

The inclusion of the Ebro Group in sustainability ratings reflects its commitment to transparency and the development of responsible business practices. These ratings not only show its performance in social, environmental and governance aspects, but also validate its efforts and continuous improvement to attain high standards in sustainability, demonstrating its positive contribution to a more sustainable and ethical future.

### Sustainability indexes in which the Ebro Group is included

- \* Vigeo Eiris ESG
- \* FTSE Russell ESG
- \* The Ethifinance ESG (Gaia Research)
- \* S&P Global Corporate Sustainability Assessment
- \* Morgan Stanley Capital International (MSCI)
- \* Standard Ethics Spanix Index
- \* IBEX Gender Equality Index to promote gender equality
- \* Carbon Disclosure Project (Climate Change)

### BUSINESS ENVIRONMENT AND CONSUMER TRENDS IN 2024

In 2024, the global economy proved resilient to an environment of tough financial conditions and inflation, which was causing such concern among the central banks, commenced its progressive stabilisation. Overall, the large international economies achieved higher growth than expected, although there are still huge differences in the evolution of different regions.

Global GDP growth was estimated at 2.7% in 2024 (2.7% in 2023). United States had a high growth rate, of 2.8% compared to 2.9% in the previous year, while the European Union grew by only 0.7% (0.4% in 2023), dragged down once again by the German economy, which contracted by 0.2%. The Chinese economy also surprised with a growth of 5% per annum, driven by decisive monetary and fiscal measures.

The first activity data for 2025 maintain a growth pattern with leading growth indicators in the USA, pointing to a 0.7% growth in the first quarter of 2025, and improvements in the EU, with a better PMI in five months, although on the verge of contraction. Finally, employment rates are holding steady at a good level in most major economies.

### Consumer environment

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. Personal experience is a right, not a choice. Their desires overlap when choosing their shopping baskets: products must be healthy, but at the same time incorporate convenience and quality. Meanwhile the demand for sustainable products is creeping in. In spite of this, price is still the main consumer driver.
- \* **Social changes**
  - a) Population changes. 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. At the same time, young people (generation Z and the new generation Alpha) have very different food consumption patterns from the older generation.
  - 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 environmental issues and sustainability, but they are not prepared to pay a significantly higher price for them.
- d) Increased mobility and immigration in many developed countries bring in new tastes, products and new 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 delivery, ...). New influencers and recommendation channels (Tik Tok, Instagram).
- 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 actors 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, ...).

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 are key to success.

The technological revolution has brought radical change in how brands communicate in respect of both message and means. 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.

Finally, Artificial Intelligence is going to bring a new cross-cutting revolution: from optimising inventories to e-commerce recommendations, including autonomous stores and tailored real-time communications.

#### FINANCIAL METRICS

In 2024, the Group's net turnover was €3,140.5 million, up 1.8% on 2023. Our Adjusted EBITDA grew 6.7% year on year to €413.1 million. Net profit was up 11.2% on 2023, at €207.9 million, and net debt stood at €593.2 million, €22.8 million more than at year-end 2023.

##### Details by business areas

(€ THOUS)	RICE	PASTA
SALES	2,454,016	691,775



## SBM – 2. Interests and views of stakeholders

\*(45)

The **principal stakeholders** of the Group are:

- \* Shareholders
- \* Customers, consumers and distributors
- \* Employees
- \* Suppliers
- \* Society (Government, NGOs and other institutions)
- \* Media

Continuous dialogue with all its stakeholders gives the Group an insight into their needs and expectations, enabling it to anticipate their demands, progress in areas such as food safety, product innovation and responsible sourcing practices, strengthen relationships with communities, anticipate and act ahead of regulatory and market changes, find out what stakeholders think of the Group, etc. In short, it enables the Group to identify opportunities and develop strategies aligned with sectoral trends, meet market demands and satisfy their social and environmental expectations.

The frequency and form of communication with each group varies according to the company of the Ebro Group and the stakeholder in question and the reason for the consultation or meeting, with at least one a year. Much of this dialogue is conducted directly by the Company, as parent of the Group.

This active communication is developed through different channels, combining formal and informal interactions, depending on the type of stakeholder.

STAKEHOLDERS	DIALOGUE CHANNELS
Shareholders	Corporate website Electronic shareholders' mailbox Shareholders' office CNMV regulatory announcements Investor Relations Department Meetings with analysts and investors Roadshows General Meeting of Shareholders Quarterly reports Annual Report Social media Press releases Whistleblowing channel
Employees	Corporate website and websites of our subsidiaries Corporate Intranet Suggestion box Social media Mailbox Digital newsletter Blogs (corporate and brand) Mailshots Department Days Works Council HR contacts Corporate Communications Department Annual Report Whistleblowing channel

STAKEHOLDERS	DIALOGUE CHANNELS
Customers, consumers and distributors	Corporate website and websites of our subsidiaries Customer services department Electronic mailboxes in each of the Group companies Parent company mailbox ( <a href="mailto:comunicacion@ebrofoods.es">comunicacion@ebrofoods.es</a> ) Advertising and Marketing Satisfaction surveys Regular one-to-one meetings and visits Social media Blogs (corporate and brand) Trade fairs, forums and conferences Annual Report Whistleblowing channel
Suppliers	Corporate website and websites of our subsidiaries Meetings with the Purchasing Departments of Group companies Supplier Code of Conduct Regular visits to suppliers Surveys Assessments through Sedex Annual Report Social media Whistleblowing channel
Society	Corporate website and websites of our subsidiaries Website of the Ebro Foods Foundation Social media Corporate blog Annual Report Communications and CSR Department Press releases Parent company mailbox ( <a href="mailto:comunicacion@ebrofoods.es">comunicacion@ebrofoods.es</a> ) Meetings with NGOs and social action institutions Meetings with local authorities Meetings with resident associations Whistleblowing channel
Media	Corporate website and websites of our subsidiaries Corporate Communications Department Parent company mailbox ( <a href="mailto:comunicacion@ebrofoods.es">comunicacion@ebrofoods.es</a> ) Press releases CNMV regulatory announcements Social media Corporate blog Regular meetings with different media Interviews Surveys and questionnaires Annual Report

The views and concerns expressed by the different stakeholders are addressed and handled by the corresponding departments, such as Marketing, Commercial, Procurements, Investor Relations and Communication. If they are considered important, these issues are submitted to the Management Committees of each of the Group companies, where the implications are analysed and assessed.

Based on that analysis, the General Managers of the Group companies inform the Chief Operating Officer (COO) of the most important aspects and the COO in turn submits them, where appropriate, to the Executive Committee and the Board of Directors of the Company. In addition, the Audit, Control and Sustainability Committee receives regular updates on these matters, at least in the reviews of the double materiality assessments, thus ensuring that the governing bodies have the necessary information to take strategic decisions.

The results of these interactions are taken into account for the relevant stakeholders. For example, customer and consumer concerns may lead to adjustments in the development of new products or improvements in communication; suppliers' comments may trigger a review of the procurement policies or new forms of collaboration; and investor and analyst expectations may have a bearing on the definition of profitability, sustainability and transparency targets.

This approach ensures that the views and opinions of the different stakeholders are reflected in the evolution of the Group's business model, favouring a strategy aligned with market demands and sustainability standards.

## SBM – 3. Material impacts, risks and opportunities and their interaction with strategy and business model

\*(48a,48b,48c,48d,48f,48g,48h)

### DOUBLE MATERIALITY ASSESSMENT

Giving continuity to the earlier double materiality assessments (DMA) and in accordance with the guidelines of the CSRD, in 2024 the Ebro Group made a new DMA in collaboration with an external consultancy, following the EFRAG recommendations, based on the fundamental sustainability standards and the regulatory and disclosure requirements. In that assessment, Ebro Foods identified 47 material impacts, risks and opportunities (IROs) of a total of 259 IROs assessed. The list of material IROs is set out in the following table:

#### E1 Climate Change

Contribution to mitigation and adaptation of the effects of climate change through the promotion of sustainable agriculture projects in the Group's principal sourcing areas, which also act as carbon sinks.	I+	A
Generation of greenhouse gases deriving from the Group's operations throughout its value chain (carbon dioxide CO <sub>2</sub> , methane CH <sub>4</sub> and nitrous oxide N <sub>2</sub> O), due to land-use changes, if any, in agricultural activities, and emissions by transport and production of products through the consumption of fossil fuels by fixed and mobile sources.	I-	A
Greenhouse gas emissions associated with sourcing in the Group's supply chain (emissions associated with the sourcing of rice and raw materials used in the production of pasta), and emissions produced by land-use changes, if any, in agricultural activities.	I-	A
Improvement of the Group's reputation owing to the anticipation and reduction of risks associated with climate change, thanks to the identification, management, reporting and monitoring of the principal physical and transition risks of climate change.	O	P
Minimisation of the future vulnerability of sourcing areas due to climate-related challenges and reduction of operating costs, as a result of the mitigation and adaptation to climate change. This includes enhancement of crop resilience, strengthening of agricultural ecosystems and the identification of climate-related factors through the Task Force on Climate-related Financial Disclosures (TCFD) report.	O	P
Increase in the purchase costs of raw materials due to the impact of climate change on the natural resources that supply them. Extreme climate events can affect the quality, quantity and geographical distribution of agricultural raw materials, increasing the costs associated with their acquisition and management.	R	A
Increase in costs associated with changes to emission allowances and new regulations, such as the EU Carbon Border Adjustment Mechanism. This may generate significant impacts on the Group's financial strategies, requiring adaptations and further investments to comply with the new environmental legislation.	R	A
<b>ENERGY</b>		
Reduction of the use of non-renewable energy resources and greenhouse gas emissions as they are replaced with renewable fuels (biomass: rice husk, wood chips, wood charcoal, etc.), self-generation of photovoltaic energy and cogeneration, as well as the purchase of electricity with GOs (guarantees of origin)	I+	A
Reduction of energy consumption as a result of implementing energy saving practices (changing convention lights to LED, energy saving project, improved energy efficiency, etc).	I+	A

I+ Positive Impact I- Negative Impact O Opportunity R: Risk P Potential A Actual

## E2 Pollution

Reduction of impacts by pollution with substances of concern or substances of very high concern in the sourcing areas by means of quality controls and detection of fungicides and pesticides, selection of suppliers with sustainability policies and provision of free biocontrol products to guarantee a rational use of pesticides.	I+	A
Pollution of effluent through own operations of pasta and rice production.	I-	P
Increase in soil acidity and impairment of microfauna as a result of the use of (inorganic or organic) fertilizers and pesticides on the crops in the Group's sourcing areas.	I-	P

## E3 Management of Water Resources

Increase in water stress due to water withdrawal in areas of water stress, both in crop-growing areas and at production plants.	I-	A
Opportunities to access public/private financing through the implementation of projects, strategies or measures to improve water quality and management (e.g. European funds).	O	P
Dependence on water resources, especially in sourcing areas and in regions with drought risks, producing operating costs and low production yields.	R	A

## E4 Biodiversity

Creation of agricultural habitats with high ecological value (wetlands, habitats of protected species, etc.)	I+	A
Land degradation and loss of soil properties as a result of intensive farming practices in the suppliers' sourcing areas.	I-	P
Operating costs as a result of reduced agricultural production due to the loss of soil properties or high temperatures that diminish crop yield.	R	A

## E5 Circular Economy

Waste reduction and recovery through actions developed to increase recovery (e.g. use of by-products such as rice husk, wood chips and wood charcoal) and recycling.	I+	P
Increase in consumer food safety and reduction of food waste as a result of the Group's initiatives to combat food waste (e.g. participation of Ebro Foods in the Waste Warrior Brand Community, collaboration with AECOC, campaigns and actions to raise society and employee awareness of issues, etc.).	I+	A
Greater resilience in the Group's production processes due to broad diversification of the Group's supply chain which enables it to mitigate the risks and availability of raw materials over time.	O	P

## S1 Own Workforce

### WORKING CONDITIONS

Greater satisfaction of workers as a result of oversight of workers' rights in the Group through the implementation of fair labour practices (e.g. adequate working times, adequate wages, control of occupational hazards). This not only strengthens the capacity of its workforce, but also contributes to social and economic stability in the communities in which it operates, promoting a fair and equal working environment that improves the well-being of the workers and their families.	I+	A
Greater access by workers to collective bargaining enabled by the Group through the existence of Works Councils that achieve improved working conditions and increase the proportion of workers covered by collective agreements, thus strengthening employment relationships. This contributes to workers' well-being and to social and economic stability in the communities in which the Group operates.	I+	A
Lack of equal pay, performance or length of service recognition or conditions of inequality deriving from a heterogeneous distribution of workforce remuneration not based on objective criteria (pay gap).	I-	P
Improvement of Group's reputation thanks to a good health and safety management system (e.g. certification under ISO 45001). The Group thus demonstrates its commitment to protecting the health and well-being of its workers. This not only reduces the possibility of occupational injuries and ill health, but also boosts the confidence of both employees and other stakeholders, such as customers, investors and local communities.	O	P

### TRAINING AND SKILLS DEVELOPMENT

Difficulty in attracting talent specialised in areas such as maintenance and electromechanics, which generates a critical operating risk for Ebro and its subsidiaries, as these jobs are essential to guarantee the continuous functioning of machinery and essential equipment.	R	A
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I+ Positive Impact I- Negative Impact O Opportunity R: Risk P Potential A Actual

## S1 Own Workforce

### DIVERSITY AND INCLUSION

Workers' confidence thanks to the creation of a culture of respect and safety among the Group's workers through implementation of the EU Whistleblowing Directive and the Internal Reporting System, boosting the confidence of society in the working environment and contributing to the building of safer, fairer communities.	I+	A
Increase in responsible brand value due to the implementation of policies that promote equal pay and equal opportunities based on gender, race, sexual orientation, disability, etc. in the company. This will promote the Group's position in the market as a socially responsible company committed to the inclusion of disability and diversity.	O	P

### PROMOTION OF HUMAN RIGHTS

Theft, leaks or unauthorised access to private or confidential information of the company or third parties, intellectual property or financial information of the Group; and cyber attacks that also cause interruptions in the Group's commercial transactions due to its highly automated and digitalised production processes and research and development.	R	P
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## S2 Workers in the Value Chain

Protection of children's rights for workers throughout the Group's value chain, strictly prohibiting child labour and forced labour as established in the Supplier Code of Conduct. This boosts social cohesion and sustainable development of the community.	I+	P
Impact on work-life balance, personal well-being and family and social relations due to lack of oversight by the Group to ensure that the working conditions stipulated in the Supplier Code of Conduct are met, especially with suppliers of wheat and rice within the supply chain. This deficient oversight could result in violations of labour rights, affecting not only the workers but also their personal and social environments.	I-	P
Improvement of Group's reputation by establishing business relationships with selection criteria to guarantee secure, stable employment with adequate wages and working times. This can in turn improve the performance of work teams in the value chain, contributing towards achieving a more productive and satisfied labour force, which has a positive impact on our operating performance.	O	P

## S3 Affected Communities

Creation of labour, economic and social opportunities in the communities in which the Group has own or commercial operations, through the creation of employment in the society.	I+	A
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## S4 Customers and Consumers

### CUSTOMER SATISFACTION

Product supply security for customers thanks to the Group's diversification to procure raw materials in sourcing areas that can cope with raw material shortages or other sourcing problems that might be encountered by suppliers.	I+	A
Business expansion to new customers and markets, driving a growth in turnover, focusing on business lines with high potential such as microwave rice in the United States and Spain. Improvements are also being made in packaging productivity and alternative supply sources are being explored with a view to optimising operation and taking advantage of new opportunities.	O	P
Higher costs incurred in researching new consumer and/or customer needs and implementing measures to meet their requirements for improved product quality.	R	A

### FOOD SAFETY AND QUALITY

Enhanced consumer safety due to rigorous health and safety standards in products and the promotion of food safety programmes.	I+	A
Increased capitalisation of internalisation processes, ensuring that the essential safety aspects are incorporated in the development of new products at the industrial plants and R&D centres. This raises safety standards, strengthens the Group's commitment to quality and guarantees regulatory compliance on a global level, promoting safe, efficient operation.	O	P
Greater requirements due to changes in the European regulation of quality and safety standards, which entail increased sustainability reporting. Breach of or failure to adapt to these regulations could result in regulatory fines and a loss of credibility and confidence among consumers and other stakeholders.	R	A

### PRODUCT AND BRAND DEVELOPMENT

Loss of customers due to higher prices of end products, attributable to the fluctuations in availability and costs of the agricultural inputs, affected by climate, geopolitical and economic factors.	R	A
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I+ Positive Impact I- Negative Impact O Opportunity R: Risk P Potential A Actual



### GOV-1 Management of Relationships with Suppliers

Ability to support respect for human rights and social and environmental development by fostering the assessment and selection of suppliers based on social, ethical and environmental criteria.	I+	A
Positive influence on standards and practices in the food sector by joining sector-specific initiatives or collaborative platforms on sustainability and ethics-related topics (e.g.: <i>Forética</i> and SAI Platform).	I+	A
Increased demands of suppliers, who must strengthen sustainability-related aspects. This is due to the inclusion of new clauses in the Group's contracts in the wake of the new regulations on ESG.	I-	P
Strengthening of risk management in the Group's supply chain through the platform Countryrisk.io, prioritising due diligence with critical suppliers to mitigate identified risks.	O	P
Increase in operating costs as a result of unexpected fluctuations in input prices, quality issues in supplies that require additional corrections, or exchange rate fluctuations due to our dependence on suppliers located in different countries.	R	A
Loss of existing suppliers who fail to meet the new sustainability requirements.	R	A

### Sector-Specific Innovation

Increase in costs above those initially budgeted in the implementation of the Group's research, development and innovation (R&D + innovation) projects. A shortage of financial resources can lead to slow or insufficient development of the project.	R	A
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I+ Positive Impact I- Negative Impact O Opportunity R: Risk P Potential A Actual

The material IROs identified are fully aligned with the targets defined in the Group's sustainability strategy and business model, focusing on the reduction of emissions, responsible management of resources and the social and labour well-being of our people; giving priority to measures that reduce risks and manage negative impacts, both potential and real, on people and the environment, such as soil pollution, greenhouse gas emissions and labour risks in the supply chain, while at the same time strengthening the positive impacts identified, such as the improvement in energy efficiency, reduction of waste and promotion of sustainable production practices.

The material impacts are closely linked to the Group's principal activities and business relationships. Sustainability-related criteria have been established for suppliers in the supply chain, while in the production processes the Group is working on optimising resources and reducing our environmental impact. At the distribution stage, the primary goal is to guarantee supply and make sure that our products comply with the quality and safety standards and meet customers' and consumers' expectations.

The time horizons defined: short term (up to one year), medium term (1-3 years) and long term (more than three years), coincide with the Group's strategic periods, enabling it to improve planning, allocate resources more efficiently and track progress more accurately.

### CURRENT FINANCIAL EFFECTS OF MATERIAL RISKS AND OPPORTUNITIES

The current financial effects of relative importance during 2024 are those related with the COL (cut-off low) that affected the Group's facilities in the Region of Valencia. Events of this nature have been linked with the climate change risk, due to the impact that climate change has on the quantity of energy available for this kind of natural phenomena. Details of the financial impact are set out in Note 7.2 of the Consolidated Annual Accounts (in a sum of €1.8 million). No material IRO has been identified for which there is a significant risk of a material adjustment within the next annual reporting period.

We apply the phase-in provisions of Appendix C of ESRS 1 to the anticipated financial effects.

## RESILIENCE OF THE STRATEGY AND BUSINESS MODEL TO MATERIAL IMPACTS AND RISKS

The Ebro Group is working to reinforce its sustainability strategy for managing the material impacts and risks identified, including measures to increase its ability to adapt and respond to environmental, social and regulatory challenges.

Accordingly, the Group has adopted an approach structured around three main areas:

1. Management of environmental risks and operating efficiency
  - \* Implementation of initiatives to reduce greenhouse gas emissions, focusing on optimising energy consumption in its production processes.
  - \* Reinforcement of circular economy strategies, prioritising efficient water management, reduction of waste and re-use of materials in the value chain.
  - \* Adaptation to climate and environmental regulations, acting ahead of future regulations and ensuring that international standards are met.
2. Resilience in the supply chain and business relationships
  - \* Assessment and mitigation of risks in the supply chain, guaranteeing the traceability of raw materials and establishing sustainability criteria for strategic suppliers.
  - \* Diversification of sources of supply to minimise exposure to climate or geopolitical risks that might affect the availability of critical inputs.
  - \* Promotion of responsible business relationships, encouraging practices aligned with the Group's ESG commitments.
  - \* Integration of sustainability in the corporate strategy.
3. Development of a sustainable governance framework that incorporates ESG criteria in strategic decision-making
  - \* Investments in projects aligned with energy transition and innovation in sustainable production.
  - \* Reinforcement of the organisational sustainability culture, increasing employee awareness and providing training in responsible practices.

Through these efforts, the Ebro Group improves its ability to anticipate and respond to the material impacts identified, ensuring that its business model is still competitive and sustainable in the short, medium and long term.

It should be noted that there have been no changes in the material IROs in respect of earlier years because 2024 is the first year in which this Statement has been issued under the CSRD.



## IRO –1. Description of the processes to identify and assess material impacts, risks and opportunities

\*(53)

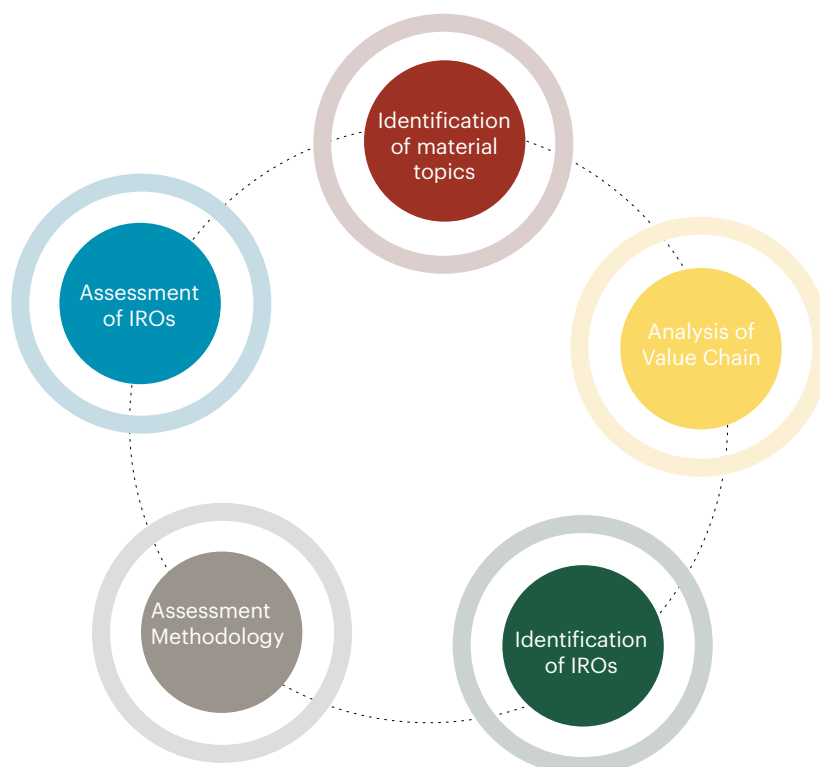
Implementation of the Double Materiality Assessment (DMA) must act as a tool to understand the current situation in terms of companies' sustainability and draw up action plans to promote real changes. For the Group's DMA, an integral assessment process was carried out, starting with identification of the material topics and ending with assessment of all the IROs identified. This assessment considered all the Group's tangible assets.

Each stage of this process was carefully defined and outlined to meet the requirements of the CSRD.

The assessment process included the stages indicated below:

- ✱ **Identification of material topics:** Material topics were identified and prioritised based on an integral diagnosis that included an analysis of internal and external documentation, stakeholders' expectations, sector-specific trends and the ESG impacts associated with our business activity.
- ✱ **Analysis of the value chain:** The value chain of the Ebro Group was mapped, outlining the scope of each stage and the relevant stakeholders to guarantee a deep understanding of the operating impacts and interconnections.
- ✱ **Identification of IROs:** The IROs were defined for each Sub-Topic and Sub-Sub-Topic, making sure that all potential impact areas were considered and addressed adequately, together with their dependencies.
- ✱ **Methodology of assessment:** Common standards were established for assessment of the IROs. This included establishing assessment criteria for quantification and final assessment, following the EFRAG recommendations.
- ✱ **Assessment of the IROs:** The IROs were assessed insofar as they affected stakeholders and throughout the value chain. The purpose of this exhaustive assessment was to validate the findings and guarantee the accuracy and relevance of the outcome of the assessment.

Figure 2. Integral Assessment Process



## 1. IDENTIFICATION OF MATERIAL TOPICS

The material topics were identified and prioritised based on an integral diagnosis that included an analysis of internal and external documentation, sector-specific trends and stakeholders' expectations.

This was done based on a regulatory framework encompassing the following:

- \* Corporate Sustainability Reporting Directive (CSRD)
- \* Materiality Assessment Implementation Guidance (EFRAG)
- \* Value Chain Implementation Guidance (EFRAG)

### Internal documentation

The documentation of the Ebro Group was analysed to obtain an overall vision of the company and its business activities, while at the same time identifying the impacts, risks and opportunities deduced from those documents.

The analysis included checking public and internal documents selected in line with the ESRS guidance, providing information on the following:

- \* Reporting and Compliance Documents (e.g. Non-Financial Statement 2023)
- \* Organisation structure (e.g. organisation charts of the Group and subsidiaries)
- \* Organisational Culture and Management (e.g. Employee Climate Survey 2023)
- \* Corporate Policies and Strategies
- \* Policies, manuals and procedures that are applicable to the entire Group (e.g. Sustainability, Environment and Corporate Social Responsibility Policy, Corruption and Bribery Policy, Risk Control and Management Policy...)
- \* Codes of Conduct (e.g. Code of Conduct of the Ebro Foods Group, Supplier Code of Conduct)
- \* Strategy of the long-term sustainability plan "HEADING FOR 2030"

### External documentation

To get a full view of the external context of the Ebro Group, the expectations of standards and best practice, stakeholder expectations (competitors, customers and consumers) and Indexes were analysed.

#### \* Analysis of ESG standards and best practice

The documentation of ESG standards and best practice includes sector-specific reports, studies and analyses.

- Spanish Federation of Food and Beverage Industries (FIAB)
- Spanish Commercial Coding Association (AECOC)
- *Forética*
- SAI Platform
- Sustainable Rice Platform (SRP)
- SASB

#### \* Analysis of competitors

A comparative analysis of competitors was made, based on a review of their public documentation, with the aim of identifying which sustainability matters they prioritise. The competitors analysed were:

- Mars
- KRBL Limited
- Barilla
- De Cecco
- Unilever



#### \* Analysis of customer and consumer expectations

The sustainability-related expectations of our main customers were identified by analysing their Non-Financial Statements. This was done by assessing the requirements they establish for their suppliers and the material topics they prioritised in their respective value chains. The top 9 customers of the different subsidiaries were analysed, as named below:

- Mars Belgium
- Mercadona
- Carrefour
- Marks & Spencer
- Ocado
- Walmart
- Loblaws
- Tesco
- Sainsbury's

Consumer expectations were analysed based on the Reports on consumer trends and expectations published by the major consulting firms for consumer markets: Kantar, Mintel and Nielsen.

#### \* Analysis of expectations of reporting indexes






The material topics considered by the following principal sustainability reporting indexes were identified:

- MSCI
- Dow Jones Sustainability Index
- FTSE4Good
- Sustainalytics
- CDP

### Identification of preliminary topics

The topics were organised and consolidated after an exhaustive compilation of the longlist of material topics based on the analyses indicated above. The matters identified were thus grouped into 17 potentially material topics (Figure 3), considering their similarities and interdependencies. This enabled us to define clearly and strategically the key aspects to be assessed in terms of impact materiality and financial materiality, facilitating their prioritisation in accordance with the CSRD requirements.

Figure 3. Comparison of ESRS standards with the preliminary topics of Ebro Foods Group

REPORTING BLOCK	ESRS STANDARD BY TOPIC	EBRO FOODS TOPICS			
		TOPIC 1	TOPIC 2	TOPIC 3	TOPIC 4
 Cross-Cutting	ESRS 2 – General Disclosures				
 Environmental	ESRS E1 – Climate Change	Climate Change	Energy		
	ESRS E2 – Pollution	Pollution			
	ESRS E3 – Water and Marine Resources	Management of Water Resources			
	ESRS E4 – Biodiversity	Biodiversity and Ecosystems			
	ESRS E5 – Circular Economy	Resource Management and Circular Economy			
 Social	ESRS S1 – Own Workforce	Working Conditions	Diversity and Inclusion	Training and Skills Development	Promotion of Human Rights
	ESRS S2 – Workers in the Value Chain	Responsible Value Chain			
	ESRS S3 – Affected Communities	Affected Communities			
	ESRS S4 – Consumers and End-Users	Customer Satisfaction	Brand and Product Development	Food Safety and Quality	
 Governance	ESRS G1 – Business Conduct	Management of relationships with suppliers			
 Sector	Innovation and Digitisation				

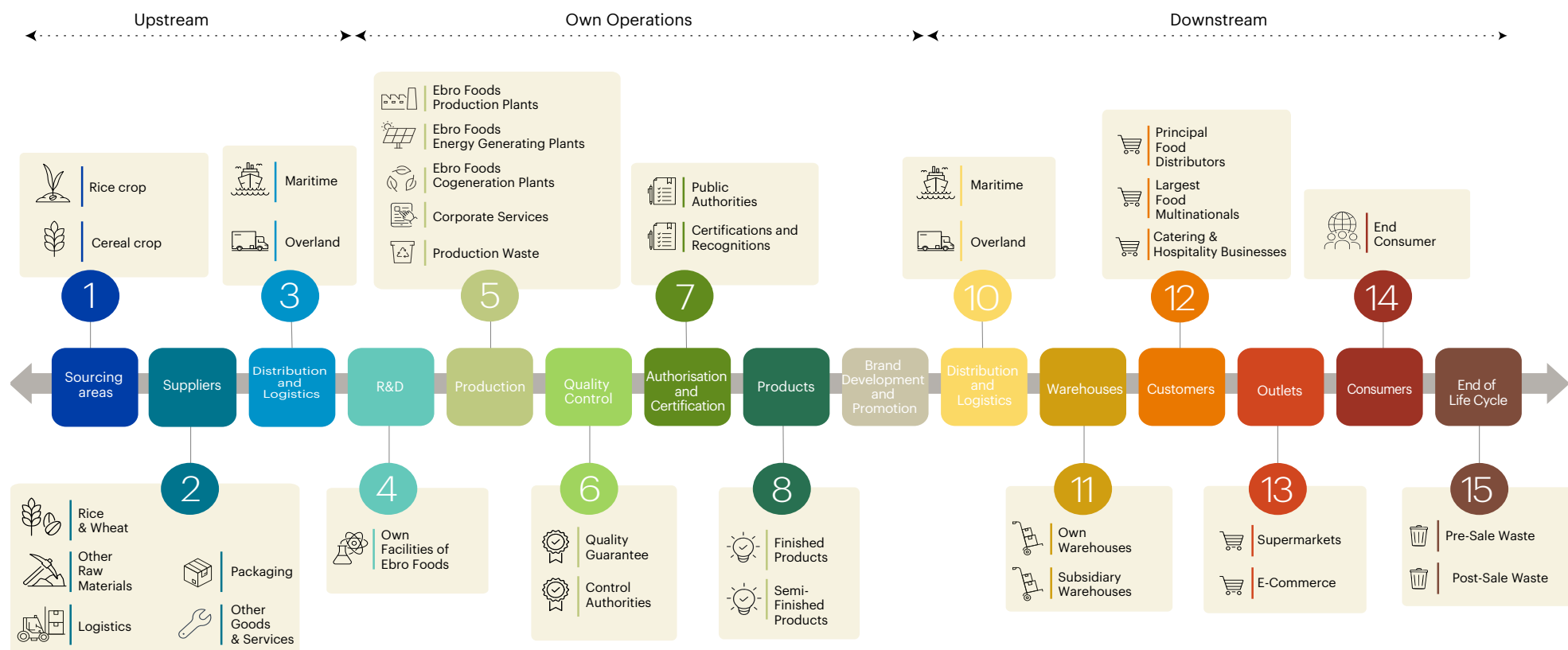


## 2. ANALYSIS OF THE VALUE CHAIN

### Construction of the value chain

In an effort to accurately identify the Impacts, Risks and Opportunities related with the Ebro Group's operations, an analysis was made of the value chain - upstream, own operations and downstream (Figure 4). This analysis involved mapping the principal activities and sub-activities of the Group.

Figure 4. Analysis of value chain



This analysis not only highlights the areas where sustainability-related practices could be improved, but can also be used to identify vulnerabilities where the Group's operations could be adversely affected by external factors.

### Identification of stakeholders

An analysis was made of internal documents and the views of key stakeholders to obtain a comprehensive understanding of the environmental, social and governance (ESG) factors affecting the Group. The feedback from the stakeholders identified in the earlier DMA was also taken into account.

In order to carry out this Double Materiality Assessment process effectively in terms of both construction of the value chain and identification and evaluation of the Impacts, Risks and Opportunities, the key stakeholders were meticulously identified and classified into three main groups:

- \* **Internal stakeholders:** These included executives, employees and internal departments whose day-to-day operations and decision-making processes are essential for the sustainability initiatives.
- \* **External stakeholders:** These included suppliers, customers, local communities, regulatory authorities and non-governmental organisations, among others, whose contributions help to shape the Group's external sustainability practices and policies.
- \* **Silent stakeholders:** These included entities or elements that are impacted by and may influence our business decisions, but have no direct voice in the decision-making process. According to ESRS 1 (AR 7), nature can be considered a silent stakeholder. In this case, the ecological and species conservation data can help evaluate the relative importance of the company. Other examples of silent stakeholders could include ecosystems, endangered species or even future generations, who suffer the consequences of present decisions with no power to influence them directly. The environment was considered a silent stakeholder for this assessment.

### 3. IDENTIFICATION OF IROS

Impacts, Risks and Opportunities (IROs) were identified at the level of topic, sub-topic and sub-sub-topic to make sure all sustainability matters specified in the CSRD were covered.

We thus identified a total of 259 IROs. Moreover, the IROs were mapped within the value chain to identify which activities might be more impacted by them.

In addition, in pursuance of section 131(b) of ESRS 1, we identified sector-specific IROs corresponding to "Innovation and Digitalisation", in addition to the topics established in the ESRS. The number of IROs identified per topic is shown in Table 1 below.

**Table 1. Total IROs identifies for each ESRS and sector specific IROs**

TOPIC	IROS IDENTIFIED
E1 – Climatic change	21
E2 – Pollution	14
E3 – Water and marine resources	10
E4 – Biodiversity and ecosystems	17
E5 – Circular economy	15
S1 – Own workforce	48
S2 – Workers in the value chain	34
S3 – Affected communities	17
S4 – Consumers and end-users	35
G1 – Business conduct	38
<i>Sector specific: Innovation and Digitisation</i>	10
<b>TOTAL</b>	<b>259</b>

### Justification of exclusions

After identifying the IROs, a second analysis was made to assess their correspondence to the internal and external context of the Group's activities. As a result of this process, any IROs that did not take account of the reality of our business were excluded, thus ensuring that the assessment focused on the impacts, risks and opportunities that actually applied to the Group and its value chain.

### Dependencies

When identifying the risks and opportunities (RO), particular attention was paid to understanding their interconnections. The process involved an analytical examination of how the specific impacts within our operations or in external environments are linked to potential risks and opportunities.

## 4. ASSESSMENT METHODOLOGY

### Impact materiality

In the impact assessment, we assessed both positive and negative impacts, distinguishing between potential and actual impacts and considering their impact on people, the environment and human rights in the short, medium and long term.

Different criteria were applied to establish the assessment categories, depending on whether they were positive or negative impacts:

- ✱ In the case of actual negative impacts, we considered aspects such as the scale, scope and irremediable character of the impact. For potential negative impacts, we assessed the likelihood of occurrence mapped onto the relevant time horizon.
- ✱ For actual positive impacts, the criteria of scale and scope were taken into account, and for potential positive impacts, their likelihood of occurrence was estimated and mapped onto the relevant time horizon.

We include a brief explanation regarding section 3.3.1 (Impact materiality assessment) of the EFRAG Materiality Assessment Implementation Guidance. Depending on the kind of impact, it is not always necessary to assess in depth each of the criteria of severity, based on the Group's specific facts and circumstances, to determine whether the impact is material or not. For example, when there is established scientific consensus about the severity of a particular kind of global or localised environmental impact, it is possible to conclude that it is a negative impact without having conducted an in-depth analysis of its scale, scope and irremediable character.

### Financial materiality

As stipulated in ESRS 1 section 3.5 Financial materiality in the Annex to the Commission Delegated Regulation, from the financial perspective, certain risks and opportunities were identified by establishing appropriate qualitative thresholds related with the anticipated financial effects on performance, financial position, cash flows and access to finance, including the cost of capital. In this context, the materiality of the risks and opportunities is assessed based on a combination of the likelihood of occurrence and the potential scale of the financial effects.



## 5. SCALE OF ASSESSMENT

### Impact materiality

As mentioned earlier, impact materiality takes account of severity and likelihood for each positive (Figure 5) and negative (Figure 6) impact identified in each Sub-Topic or Sub-Sub-Topic.

Severity was calculated as the average ratings for scale and scope, in the case of positive impacts, and for scale, scope and irremediable character for negative impacts.

In each of these dimensions, different aspects were qualitatively rated from 1 to 4, 4 being the highest level and 1 the lowest.

- ✱ **Scale:** This assesses the social impact, the impact on human rights and the environmental impact. The final value of the scale is that of the aspect given the highest rating.
- ✱ **Scope:** This includes both the geographical scope (whether the impacts are international, European or national) and how many stakeholders are affected. The final value of the scope is the average rating obtained for geographical scope and affected stakeholders.
- ✱ **Irremediable character:** This is only assessed in the case of negative impacts and considers the difficulty of mitigating the impact should it occur.

The final value of severity was obtained as the highest rating between scale (social and human rights, environmental) and irremediable character. The average was then taken of the final values of scale and scope.

With regard to likelihood (for potential impacts), two metrics were considered:

1. **Likelihood of occurrence:** Measured from 1 to 4, where 4 was the highest likelihood and 1 no likelihood.
2. **Time horizon:** A correction factor was applied according to the time horizon in which it was considered that the impact could occur:
  - Short term (less than 1 year): 0 points
  - Medium term (1 to 3 years): -0.25 points
  - Long term (more than 3 years, or with a time horizon that is difficult to define): -0.5 points

Finally, the value of impact was obtained by weighting the severity outcome and the likelihood outcome at 50% each.

With regard to impacts on Human Rights and as specified in ESRS 1 section 45, severity prevails over likelihood when identifying material issues.

To guarantee correct application of this principle in the methodology, a specific reference to Human Rights was incorporated in the social scale headings.







Furthermore, the prevalence of severity over Human Rights was integrated directly in the valuation scale, such that when an impact was greater on a social level, the assessment of Human Rights had priority over other factors such as the environmental impact or the possibility of remediation.

In addition, each of the negative impacts was analysed separately, considering any impact on Human Rights to be severe. Accordingly, the severity of the impact prevailed over its likelihood when assessing materiality.

Figure 5. Outline of the methodology used for the assessment of positive impacts

SCORE	SCALE		SCOPE		LIKELIHOOD	<div><div></div></div>	TIME HORIZON	POSITIVE IMPACT RATING
	ENVIRONMENTAL	SOCIAL	GEOGRAPHICAL	STAKEHOLDERS				
4	Extremely positive impact on the environment, benefiting on a large scale the global targets for reducing emissions and controlling the temperature	Extremely positive impact on people's well-being, the development of society or human rights	International scope	All stakeholders benefit or are affected	Recurrent event, experienced in the past	<div>Correction factor (When the impact will have most likelihood of occurrence)</div> <div><div>Short term</div><div>+0</div></div> <div><div>Medium term</div><div>-0.25</div></div> <div><div>Long term</div><div>-0.5</div></div>	<div>Critical Points &gt; 3.4</div> <div>Material Points = [2.5-3.4]</div> <div>Not material Points &lt; 2.5</div>	
3	Significant positive impact on the environment, benefiting the global targets for reducing emissions and controlling the global temperature	Significant positive impact on people's well-being, the development of society or human rights	European scope	More than 50% of the stakeholders benefit or are affected	Likely event, experience shows that it occurs more than once a year			
2	Moderate positive impact on the environment with temporary effects	Moderate positive impact people's well-being, the development of society or human rights	National scope	Less than 50% of the stakeholders benefit or are affected	Possible event: Event is not common, but feasible			
1	Little or no positive impact on the environment	Minor or no positive impact on people's well-being, the development of society or human rights	Does not affect anyone	No stakeholders benefit or are affected	Unlikely to occur or has never been experienced in the past			
ILLUSTRATIVE EXAMPLE	4	1	4	3				
	The highest score is taken of environmental (4) and social (1) = 4		Average = Geographical (4) and Stakeholders (3)= 3.5		4		0	
	Average = Scale (4) and Scope (3.5) = 3.75				4			
	3.75		<div><div></div></div> 50%	+		4	<div><div></div></div> 50%	= 3.88

Figure 6. Outline of the methodology used for the assessment of negative impacts

SCORE	SCALE		POSSIBILITY OF REMEDIATION	SCOPE		LIKELIHOOD		TIME HORIZON	NEGATIVE IMPACT RATING
	ENVIRONMENTAL	SOCIAL		GEOGRAPHICAL	STAKEHOLDERS				
4	Extremely negative impact on the environment, affecting on a large scale the global targets for reducing emissions and controlling the temperature	Extremely negative impact on people's well-being, the development of society or human rights	Not remediable / Irreversible	International scope	All stakeholders benefit or are affected	Recurrent event, experienced in the past	<div>Correction factor (When the impact will have most likelihood of occurrence)</div> <div><div>Short term</div><div>Medium term</div><div>Long term</div></div> <div><div>+0</div><div>-0.25</div><div>-0.5</div></div>	<div>Critical Points &gt; 3.4</div> <div>Material Points = [2.5-3.4]</div> <div>Not material Points &lt; 2.5</div>	
3	Significant negative impact on the environment with lasting effects and affecting the global targets for reducing emissions and controlling the global temperature	Significant negative impact on people's well-being, the development of society or human rights	Very difficult to remedy or remediable in long / medium term	European scope	More than 50% of the stakeholders benefit or are affected	Likely event, experience shows that it occurs more than once a year			
2	Moderate negative impact on the environment with temporary effects	Moderate negative impact on people's well-being, the development of society or human rights	Difficult to remedy in short term	National scope	Less than 50% of the stakeholders benefit or are affected	Possible event: Event is not common, but feasible			
1	Little or no negative impact on the environment	Little or no negative impact on people's well-being, the development of society or human rights	Remediable	Does not affect anyone	No stakeholders benefit or are affected	Unlikely to occur or has never been experienced in the past			
ILLUSTRATIVE EXAMPLE	4	1	2	4	3				
	The <b>highest</b> score is taken of environmental (4), social(1) and possible remediation (2) = <b>4</b>			Average = 3.5		3		-0.25	
	Average = Scale (4) and Scope (3.5) = 3.83							2.75	
	2.89 							2.75 	





### Financial materiality

Financial materiality takes account of the magnitude and likelihood of each risk (Figure 7) and opportunity (Figure 8) identified in each Sub-Topic or Sub-Sub-Topic.

Magnitude and likelihood were measured from 1 to 4, where 1 was the minimum and 4 the maximum.

The magnitude of the risks considered different risks:

- \* Reputational
- \* Business growth
- \* Financial performance
- \* Access to finance
- \* Regulatory
- \* Operational

The magnitude of the opportunities considered different opportunities:

- \* Reputational
- \* Business growth
- \* Financial performance
- \* Access to finance

To ensure that the assessment of risks and opportunities adequately reflected their impact on the Group and prevent dilution or distortion, the highest rating was taken of the different metrics rated. The rating thus prioritised the aspect with the greatest potential impact within each category, ensuring a more accurate and representative analysis of the financial materiality.

In the case of likelihood, we considered:

- 1. Likelihood of occurrence:** Measured from 1 to 4, where 4 was the highest likelihood and 1 no likelihood.
- 2. Time horizon:** A correction factor was applied according to the time horizon in which it was considered that the impact could occur:
  - Short term (less than 1 year): 0 points
  - Medium term (1 to 3 years): -0.25 points
  - Long term (more than 3 years or with a time horizon difficult to define): -0.5 points

Finally, the value of the risk/opportunity was obtained by weighting the magnitude outcome and the likelihood outcome at 50% each, in line with the methodology used in the Group's risk map, thus ensuring a homogeneous approach to identification and prioritisation of impacts.

Figure 7. Outline of the methodology used for the assessment of risks


SCORE	MAGNITUDE						LIKELIHOOD		TIME HORIZON	RISKS RATING					
	REPUTATIONAL	BUSINESS GROWTH	FINANCIAL PERFORMANCE	ACCESS TO FINANCING	REGULATORY	OPERATIONAL									
4	Critical damage to reputation and stakeholder confidence	Adversely affects the company's financial statements (revenues, costs, assets or liabilities), with critical impact on performance and financial position	Adversely affects the cash flow and financial performance, with critical impact on performance and financial position	Adversely affects access to finance, with critical impact on the company's financing capacity	Critical breaches: possible suspension	Disruption of all businesses	Recurrent event, experienced in the past	<p>Correction factor (When the opportunity will have greatest effect)</p> <table><tr><td>Short term</td><td>+0</td></tr><tr><td>Medium term</td><td>-0.25</td></tr><tr><td>Long term</td><td>-0.5</td></tr></table>	Short term	+0	Medium term	-0.25	Long term	-0.5	<div>Critical Points &gt; 3.4</div> <div>Material Points = [2.5-3.4]</div> <div>Not material Points &lt; 2.5</div>
Short term	+0														
Medium term	-0.25														
Long term	-0.5														
3	Significant damage to reputation and stakeholder confidence	Significantly affects the financial statements (revenues, costs, assets or liabilities), requiring strategic action	Adversely affects cash flow and financial performance to a certain extent and requires evaluation	Adversely affects access to finance and requires evaluation	Serious breaches: possible revocation	Disruption in the rice business	Likely event, experience shows that it occurs more than once a year								
2	Moderate damage to reputation and stakeholder confidence	Minor risk with low negative impact on the financial statements (revenues, costs, assets or liabilities)	Minor, low impact risk on cash flow and financial performance	Minor, low impact risk on access to finance	Moderate breaches	Disruption in the pasta and premium pasta business	Possible event: Event is not common, but feasible								
1	Little or no damage to reputation and stakeholder confidence	Little or no impact on the financial statements (revenues, costs, assets or liabilities)	Little or no impact on the cash flow and financial performance	Little or no impact on access to finance	Minor or no breaches	Minor or no disruption in business lines	Unlikely to occur or has never been experienced in the past								
ILLUSTRATIVE EXAMPLE	4	3	4	3	2	2									
	The highest score is taken = 4						4	+	-0.25						
	4						3.75	+	50%	= 2.82					

Figure 8. Outline of the methodology used for the assessment of opportunities

SCORE	MAGNITUDE				LIKELIHOOD	+	TIME HORIZON	OPPORTUNITY RATING						
	REPUTATIONAL	BUSINESS GROWTH	FINANCIAL PERFORMANCE	ACCESS TO FINANCE										
4	Brings about a considerable improvement in reputation and stakeholder confidence	Positive effect on the company's financial statements (revenues, costs, assets or liabilities), essentially contributing to performance and financial position	Positive effect on cash flow and financial performance, essentially contributing to performance and financial position	Positive effect on access to finance, essentially contributing to the company's financing capacity	Recurrent event, experienced in the past		<div>Correction factor (When the opportunity will have greatest effect)</div> <table><tr><td>Short term</td><td>+0</td></tr><tr><td>Medium term</td><td>-0.25</td></tr><tr><td>Long term</td><td>-0.5</td></tr></table>	Short term	+0	Medium term	-0.25	Long term	-0.5	<div>Critical Points &gt; 3.4</div> <div>Material Points = [2.5-3.4)</div> <div>Not material Points &lt; 2.5</div>
Short term	+0													
Medium term	-0.25													
Long term	-0.5													
3	Brings about a significant improvement in reputation and stakeholder confidence	Significant effect on the company's financial statements (revenues, costs, assets or liabilities), requiring strategic action	Positive effect on cash flow and financial performance to a certain extent, requiring evaluation	Positive effect on access to finance requiring strategic action	Likely event, experience shows that it occurs more than once a year									
2	Brings about a moderate improvement in reputation and stakeholder confidence	Opportunity with minor, low positive impact on financial statements (revenues, costs, assets or liabilities)	Opportunity with minor, low positive impact on cash flow and financial performance	Opportunity with minor, low positive impact on access to finance	Possible event: Event is not common, but feasible									
1	No perceivable improvement in reputation and stakeholder confidence	Little or no impact on the financial statements (revenues, costs, assets or liabilities)	Little or no impact on cash flow and financial performance	No impact or low positive impact on access to finance	Unlikely to occur or has never been experienced in the past									
ILLUSTRATIVE EXAMPLE	4	1	4	3										
	Average = Scale (4) and Scope (3.5) = 3.75				4	+	0							
	3.75					+	4		3.5					

## ASSESSMENT OF IROS

### Assessment criteria

To facilitate the assessment process and unify the reasoning behind the rating of the different factors of the IROs, we created a set of assessment criteria in the form of headings. These headings not only established the scoring intervals for each factor to be evaluated, but also provided detailed descriptions for each interval, thus minimising the possibility of subjective interpretation.

Generally speaking, the scoring intervals ranged between 1 and 4. These intervals were applied to all the factors except the time horizon, for which correction factors were considered (see section 2.5. "Scale of assessment"). This scale entailed a number of characteristics:

- ✱ **Greater simplicity and clarity:** A smaller scale facilitates comprehension and evaluation, avoiding the confusion that might arise from using a broader scale, such as from 0 to 10, where the difference between close scores may be less significant or subjective.
- ✱ **Easier decision-making:** With a scale of 1 to 4, there is a clearer difference between levels, which leads to a clearer classification, enabling more effective prioritisation and concentration on the more critical IROs.
- ✱ **Reduced subjectivity:** Limiting the range of options reduces the possibility of ambiguous interpretations between the different headings, enabling greater coherence in the assessment.

The methodology used to identify and evaluate IROs is based on a qualitative approach, enabling the integration of multiple perspectives and the assessment of aspects that may not be readily quantifiable. With this approach there are no numerical margins of error or levels of uncertainty, although consistent criteria have been applied to guarantee a reliable assessment.

### Criticality threshold

The criticality threshold for materiality was set at 3.4, because IROs with higher likelihood and severity were identified above that score. This ensured that the assessment prioritised factors with a significant impact in the Group.

This selection enabled us to differentiate effectively between material IROs and those which, although important, did not reach the critical level necessary to warrant priority management.

With this threshold, attention could be focused on the IROs that might really represent a considerable impact for the stakeholders and the Group, by virtue of both their high likelihood and their severity, thereby enabling effective prioritisation in decision-making and the management of risks and opportunities.

The details of IROs considered material are set out in the section SBM – 3. I Material impacts, risks and opportunities.

Many of the sustainability-related risks were already contemplated in the Group's Risk Map. Based on the Double Materiality Assessment, the Group decided to segregate those risks into a separate category, including a few other risks detected in the Double Materiality Assessment (especially those related with the value chain). All those risks are given priority over other risks according to the existing criteria based on likelihood, level of impact and time horizon, on a scale of 1 to 4 (low to very high), like the one used in the Double Materiality Assessment.



Decision-making regarding IROs also follows the general structure of the Company, as explained in the Annual Corporate Governance Report:

- \* Management Committees of the core business units of the Group, on which the Chairman of the Board and the Chief Operating Officer (COO) sit, assess the risks and opportunities and decide what measures to take.
- \* Risk officers of the core business units of the Group, who are responsible for monitoring the risk control and management systems and reporting to the Risks Committee.
- \* Risks Committee. Based on the policy established by the Board of Directors and under supervision by and reporting to the Audit, Control and Sustainability Committee, this unit is specifically responsible for coordinating and monitoring the risk control and management system.
- \* Audit, Control and Sustainability Committee. Through the Risks Committee, it performs the duties of oversight and monitoring of the risk control systems, reporting regularly to the Board of Directors on any material aspects arising in these areas.
- \* Board of Directors, which defines the general policies and criteria, including the Sustainability, Environment and Corporate Social Responsibility Policy and the Risk Control and Management Policy.

There have been no changes in the identification, assessment and management of risks in respect of the previous year, since this is the first year that they are reported.

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## IRO – 2. Disclosure requirements in ESRS covered by the undertaking's sustainability statement

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\*(56)

The material information to be disclosed on the material IROs was determined according to the outcome of the Group's Double Materiality Assessment (DMA). This process enabled us to identify and prioritise the most significant aspects according to their financial impact and their effect on the environment and society. The specific details of the material IROs are set out under the indicator "IRO 1".

In the same context, according to the Double Materiality Assessment made by the Group, the requirements established in ESRS E1 (Climate Change) were considered material. The assessment determined that both the impacts deriving from our business activities and the risks and opportunities associated with climate change were significant for the Ebro Group and its stakeholders.

The disclosure requirements complied with in preparing this Statement, following the outcome of the materiality assessment, are listed in the Content Index required by Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards Sustainability Reporting Standards. This index includes the page numbers and/or paragraphs where the related disclosures are located in this Statement. A content index referring to Act 11/2018, indicating all the requirements of that regulation complied with in this Statement is also included in the annexes hereto.

See Annexes 5.2. and 5.4.

[MDR-P] Policies of the Ebro Foods Group

To define the general guidelines of the Group and the integration of ESG criteria in our business model, the Group is governed by the following policies and principles of action approved by the Board of Directors:

This legal framework is subject to continuous review to ensure its timely adaptation to any new regulatory directives and incorporate the best practice and indications in the matter.

POLICY	LINK	ASSOCIATED STANDARD	KEY POINTS	SCOPE OF APPLICATION	APPROVED BY	OVERSIGHT & IMPLEMENTATION
Code of Conduct of the Ebro Foods Group	<a href="#">Code of Conduct</a>	E2 S1 S3 S4 G1	<p>The Code of Conduct of the Ebro Group is binding on each and all of the Professionals, regardless of their hierarchical level, position and geographical location. The Code is also binding, on the terms set out herein, on customers, suppliers, shareholders and other stakeholders with which the Ebro Foods Group interacts in its operations insofar as the values, principles and rules set out herein may be applicable to them and the Group has the power to enforce them.</p> <p>This Code contemplates the following commitments:</p> <ul style="list-style-type: none"> <li>• Commitment to Human Rights</li> <li>• Professional loyalty</li> <li>• Professional development and training</li> <li>• Work-life balance</li> <li>• Pay policy</li> <li>• Commitment to health and safety</li> <li>• Right to privacy and data protection</li> <li>• Conflicts of interest</li> <li>• Confidential information</li> <li>• Relations with suppliers</li> <li>• Relations with consumers and customers</li> <li>• Relations with rivals</li> <li>• Relations society</li> <li>• Sponsorships and social action</li> <li>• Relations with authorities, regulatory bodies and governments</li> <li>• Anti-corruption, bribery, illegal commissions, influence peddling and money laundering</li> <li>• Whistleblowing channel</li> </ul>	Ebro Group	Board of Directors	<p>Implementation &amp; oversight: Audit, Control and Sustainability Committee</p> <p>Regular oversight: Board of Directors of Ebro Foods</p>



POLICY	LINK	ASSOCIATED STANDARD	KEY POINTS	SCOPE OF APPLICATION	APPROVED BY	OVERSIGHT & IMPLEMENTATION
<b>Supplier Code of Conduct of the Ebro Foods Group</b>	<a href="#"><u>Supplier Code of Conduct</u></a>	<b>E2 E4 S2 S4</b>	<p>The Supplier Code of Conduct is applicable to all the Suppliers of companies in the Ebro Foods Group, without prejudice to any specific provisions that may be applicable in accordance with the local laws, customs and practice in different jurisdictions. This Code is also applicable to the Group companies and professionals (i.e. directors, executives and employees), who must foster compliance with the Code by the Suppliers they deal with. This Code establishes the guidelines to be followed by all Suppliers who contract with the Group, especially those operating in countries rated as high risk by the International Labour Organisation.</p> <p>It contemplates the following principles of action:</p> <ul style="list-style-type: none"> <li>• Commercial Integrity</li> <li>• Labour Rules</li> <li>• Human Rights</li> <li>• Child Labour</li> <li>• Forced or compulsory labour</li> <li>• Freedom of Association and Collective Bargaining</li> <li>• Equal opportunities and Discrimination</li> <li>• Salaries and working hours</li> <li>• Health and Safety</li> <li>• Workplace</li> <li>• Environment</li> <li>• Compliance with the Code</li> </ul>	Ebro Group  Suppliers of the Group	Board of Directors	Implementation & oversight: Audit, Control and Sustainability Committee
<b>Social Policy of the Ebro Foods Group</b>	<a href="#"><u>Social Policy</u></a>	<b>S3 S4</b>	<p>The commitment to the social needs and creation of value for local communities is one of the strategic focal points of its Corporate Social Responsibility Policy of the Ebro Foods Group. For this reason, all social action will be conducted in accordance with the principles of transparency, adaptability and value added.</p> <p>Social action shall refer mainly to the following areas, without prejudice to any others that may be considered:</p> <ul style="list-style-type: none"> <li>• assistance and social integration in the Group's areas of influence;</li> <li>• projects related with education and access to employment;</li> <li>• donations of food produced by the Group;</li> <li>• social and environmental crop standard development programmes leading to sustainable farming; and</li> <li>• promotion of healthy eating, offering consumers a broad range of Group products focusing on the Health segment.</li> </ul>	Ebro Group  Ebro Foundation	Board of Directors	Board of Directors  Annually: JGA

POLICY	LINK	ASSOCIATED STANDARD	KEY POINTS	SCOPE OF APPLICATION	APPROVED BY	OVERSIGHT & IMPLEMENTATION
<b>Sustainability, Environment and Corporate Social Responsibility Policy of the Ebro Foods Group</b>	<u>Sustainability, Environment and Corporate Social Responsibility Policy</u>	<b>E1</b> <b>E2</b> <b>E3</b> <b>E4</b> <b>E5</b> <b>S1</b> <b>S2</b> <b>S3</b> <b>S4</b> <b>G1</b>	<p>The Group undertakes, as an essential principle in its actions, the creation of a business model that is respectful of and sustainable for the environment and society overall and, while ensuring value, profitability and competitiveness, it promotes diversity, respect for human rights, tax responsibility and the prevention of corruption, thus contributing towards the progress of society and generating trust among our stakeholders.</p> <p>Through this Policy, the Group makes sustainable growth the pillar of its business management strategy, committing itself, together with its stakeholders (professionals, shareholders, communities, public and environment) to:</p> <ol style="list-style-type: none"> <li>social well-being, diversity, environmental balance and social and economic progress; and</li> <li>tax responsibility, respect for human rights and prevention of corruption and other illicit conduct.</li> </ol> <p>Establishing the following principles of action:</p> <ul style="list-style-type: none"> <li>Ethical business management and compliance with the law</li> <li>Minimising of risks</li> <li>Financial sustainability and long-term focus</li> <li>Labour relations</li> <li>Human rights</li> <li>Generation of value for the community</li> <li>Sustainability of the value chain</li> <li>Protection of the environment</li> <li>Relations with stakeholders</li> <li>Rendering of accounts and transparency</li> </ul>	Ebro Group  Ebro Foundation	Board of Directors	<p>Audit, Control and Sustainability Committee</p> <p>Communication and Corporate Social Responsibility Department</p>
<b>Policy against Corruption and Bribery of the Ebro Foods Group</b>	<u>Policy against corruption and bribery</u>	<b>G1</b>	<p>This Policy is based on the principle of “zero tolerance” of corruption and fraud in business. This principle is absolute and prevails over any kind of economic benefit that may be obtained for the Group and/or its professionals. Over and beyond mere observance and compliance with the laws and standards applicable to each of the companies in the Ebro Group because of the business they perform or the countries in which they operate, this Policy is governed by principles of maximum transparency, honesty, integrity and responsibility.</p> <p>The Policy establishes the rules of conduct to be followed in respect of:</p> <ol style="list-style-type: none"> <li>bribery, illegal commissions, influence peddling and money laundering;</li> <li>acceptance or offering of gifts and courtesies;</li> <li>dealings with authorities, regulatory bodies and government agencies; and</li> <li>social action and/or sponsorship activities.</li> </ol> <p>The Policy also indicates what conduct is prohibited in these areas.</p>	Ebro Group  Ebro Foundation	Board of Directors	Audit, Control and Sustainability Committee

POLICY	LINK	ASSOCIATED STANDARD	KEY POINTS	SCOPE OF APPLICATION	APPROVED BY	OVERSIGHT & IMPLEMENTATION
<b>Risk Control and Management Policy of Ebro Foods, S.A.</b>	Intranet; this Policy is private and is only available for employees of the Ebro Group	<b>G1</b>	<p>This Policy lays down the basic principles and general framework for control and management of the business risks, including tax risks, and internal control of financial reporting to which the Company and other companies in the Ebro Foods Group are exposed. By setting these basic rules and principles of the system it is intended to establish the criteria to be observed by the management of the Group businesses in the handling and management of the risks to which they are exposed.</p> <p>This Policy lays down the basic principles and general framework for internal control of financial reporting for risks to which the Group is exposed:</p> <ul style="list-style-type: none"> <li>• Identification of risks</li> <li>• Risk control and management system</li> <li>• Risk mitigation measures and tolerance</li> <li>• Bodies responsible for the control and management of risks, including tax risks, and control of financial reporting</li> </ul>	Ebro Group	Board of Directors	<p>Board of Directors</p> <p>Audit, Control and Sustainability Committee</p> <p>Risks Committee</p> <p>Internal Audit Department</p>
<b>Policy on the internal reporting system and whistleblower protection of the Ebro Foods Group</b>	<u>Policy on the internal reporting system and whistleblower protection</u>	<b>S1</b>	<p>This Group Policy is applicable to all and any reporting of potential irregularities or breaches of the laws applicable to the Company and its Group that may be made through any of the internal reporting channels by anyone who has acquired that information within the context of an employment or professional relationship with the Company or any of the other companies in the Ebro Group.</p> <p>The Internal Reporting System is the preferential channel for reporting any action or omission that may constitute:</p> <ol style="list-style-type: none"> <li>breaches of EU Law on the terms stipulated in Act 2/2023; or</li> <li>serious or very serious criminal or administrative breaches.</li> </ol> <p>For this purpose, the Internal Reporting System guarantees that the reports will be handled effectively and the whistleblower will not suffer any retaliation for reporting.</p> <p>The Internal Reporting System is designed as a component of the Ebro Group's compliance structure, along with the Code of Conduct, the Crime Prevention Model, the corporate policies approved by the Board of Directors and other components of that structure, particularly the Risk Control and Management Policy.</p>	Ebro Group Ebro Foundation	Board of Directors	<p>Oversight: Chair of the Audit, Control and Sustainability Committee</p> <p>System Administrator: Secretary of the Board of the Company</p>

POLICY	LINK	ASSOCIATED STANDARD	KEY POINTS	SCOPE OF APPLICATION	APPROVED BY	OVERSIGHT & IMPLEMENTATION
<b>Policy on the Selection of Directors and Diversity in the Composition of the Board of Directors of Ebro Foods S.A.</b>	Intranet; this Policy is private and is only available for employees of the Ebro Group	<b>S1</b>	<p>This Policy, applicable exclusively to the Directors of the Ebro Group, establishes the following "Applicable Principles " (point 4)::</p> <ul style="list-style-type: none"> <li>• All nominations for the selection of candidates shall be based on a prior analysis of the needs of the Board. The outcome of this analysis shall be set down in the reasoned report issued by the Nomination and Remuneration Committee, which shall be published on calling the general meeting at which the ratification, appointment or re-election of each director is to be laid before the shareholders.</li> <li>• Endeavours shall be made at all times to favour the diversity of expertise, experience, age and gender on the Board.</li> <li>• In the selection process, efforts shall be made to avoid any implicit bias that may entail discrimination on whatsoever grounds against any of the candidates.</li> <li>• In a situation in which the candidates are in equal conditions, the one whose gender is least represented on the board at that time shall be chosen.</li> <li>• The Company has set the target for the gender least represented on the Board to account for no less than 40% of all the Board members by the end of 2022 and thereafter.</li> </ul>	Board of Directors	Board of Directors	Nomination and Remuneration Committee
<b>Remuneration Policy for Directors of Ebro Foods, S.A.</b>	<u>Remuneration Policy for Directors</u>	<b>S1</b>	<p>With regard to the determination of this Policy, based on the regulation in laws and the articles of association and the principles set out above, the company's Nomination and Remuneration Committee prepares a proposed Remuneration Policy for Directors for each three-year period and submits it to the Board of Directors for consideration, together with the corresponding specific report. The Board must then adopt a reasoned decision as to whether to table a motion for its approval at the General Meeting, pursuant to section 529 novodecies of the Corporate Enterprises Act.</p> <p>This Policy, valid for the years 2025-2027, contains the following points:</p> <ul style="list-style-type: none"> <li>• Internal regulation on Directors' remuneration</li> <li>• Principles and targets governing Directors' remuneration</li> <li>• Contribution of the policy to the long-term strategy, interests and sustainability</li> <li>• Process for determining the Remuneration Policy for Directors</li> <li>• Pay and employment conditions of workers in the Company considered when establishing the remuneration policy</li> <li>• Remuneration of the Directors as such</li> <li>• Structure of Directors' Remuneration</li> <li>• Aspects to be considered in the event of future incorporation of other executive directors</li> <li>• Validity</li> </ul>	Board of Directors	General Meeting of Shareholders	Nomination and Remuneration Committee

This legal framework is subject to continuous review to ensure its timely adaptation to any new regulatory directives and incorporate the best practice and indications in the matter.

# ENVIRONMENTAL INFORMATION



## GREEN TAXONOMY

### Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

To facilitate the shift of capital flows towards more sustainable activities, meet the EU's climate and energy targets for 2030 and reach the objectives of the European Green Deal, on 22 June 2020 the EU published the Taxonomy Regulation 2020/852 (the "**Taxonomy Regulation**").

The Taxonomy Regulation establishes six environmental objectives:

- \* Climate change mitigation
- \* Climate change adaptation
- \* Sustainable use and protection of water and marine resources
- \* Transition to a circular economy
- \* Pollution prevention and control
- \* Protection and restoration of biodiversity and ecosystems

The Taxonomy Regulation also indicates the four conditions that must be met by an economic activity to be considered environmentally sustainable:

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

Against this backdrop, a first delegated act on sustainable activities for climate change mitigation and adaptation objectives was approved on 21 April 2021 and formally adopted on 4 June 2021 (Delegated Regulation (EU) 2021/2139).

On 6 July 2021, the European Commission adopted Delegated Regulation (EU) 2021/2178, which specified the content, methodology and presentation of information to be disclosed by financial and non-financial undertakings. Under this Regulation, companies must disclose the extent of eligibility and alignment of their activities through the three key performance indicators (KPIs): turnover, capital expenditure (CapEx) and operating expenditure (OpEx), as well as the accounting policy used to report how the three KPIs were determined and allocated to the numerator.

On 9 March 2022, the European Commission adopted Delegated Regulation (EU) 2022/1214 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

On 27 June 2023, the European Commission adopted Delegated Regulation (EU) 2023/2486 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities. It also adopted Delegated Regulation (EU) 2023/2485 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives.

To help interpret and implement the Delegated Acts, the European Commission publishes documents regarding certain legal provisions on Taxonomy, with a view to reducing any uncertainty deriving from the current regulatory framework.

#### **APPLICATION OF THE TAXONOMY IN EBRO FOODS: ELIGIBILITY ANALYSIS**

The Taxonomy Regulation stipulates that the undertakings subject to the Non-Financial Reporting Directive (NFRD) are obliged to publish how their economic activity is contemplated within the regulatory framework on taxonomy. Accordingly, for 2024 non-financial undertakings must report on:

- \* The eligibility and alignment of the economic activities contemplated in the Climate Delegated Act.
- \* The eligibility and alignment of the activities contemplated in the Environmental Delegated Act and the amendment to the Climate Delegated Act.

In line with these reporting obligations, in 2024 the Social Responsibility, Sustainability and Finance departments of Ebro Foods, S.A., as parent of the Group, carried out an eligibility analysis to determine whether the Group's economic activities fitted in with the descriptions of activities included in the Annexes of the Delegated Regulations.

The economic activities of the different companies that perform the Ebro Group's business - classified within the Statistical Classification of Economic Activities of the European Community (NACE) in C1061 (manufacture of grain mill products), C1073 (manufacture of pastas) and C1085 (manufacture of prepared meals and dishes) - are not included within the taxonomy-eligible activities. However, during our eligibility analysis we identified two secondary activities related with activities included in the Climate Delegated Regulation:

- \* Activity 4.30 of climate change mitigation: High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels.
- \* Activity 7.6 of climate change mitigation: Installation, maintenance and repair of renewable energy technologies.

The Environmental Delegated Regulation was also reviewed, concluding that there were no other eligible activities related with the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control or the protection and restoration of biodiversity and ecosystems.



## APPLICATION OF THE TAXONOMY IN EBRO FOODS: ALIGNMENT ANALYSIS

To analyse the substantial contribution of eligible activities to climate change mitigation, we reviewed the substantial contribution criteria.

### TECHNICAL SCREENING CRITERIA

- \* To comply with the technical screening criteria for activity 7.6, the activity must consist of the installation, maintenance and repair of certain individual measures if installed on-site as technical building systems. In this case, we directly meet the technical screening criteria because photovoltaic panels have been installed on-site for self-supply.
- \* The technical screening criteria for activity 4.30 were reviewed, concluding that as we have no internal system for compiling and segregating the information on taxonomy, we cannot prove that those criteria are met.

### DO NO SIGNIFICANT HARM (DNSH)

#### \* Climate change adaptation

Appendix A to Annex I of the Climate Delegated Regulation establishes as one of the general criteria of “do no significant harm to climate change adaptation”, that undertakings should carry out an analysis of physical climate risks for the activity, by making a vulnerability assessment using climate projections based on state-of-the-art science. They are also required to adopt adaptation solutions that reduce the most important physical climate risks. During 2024, the Ebro Group completed its analysis of both physical and transition climate risks under the reference framework of the Task Force on Climate-related Financial Disclosures (TCFD) and the International Panel of Experts on Climate Change (IPCC), considering short-term (0-5 years), medium-term (5-10 years) and long-term (more than 10 years) time horizons. For more information on the assessment of climate risks, see ESRS E1, which is applicable to the two activities considered eligible.

#### \* Sustainable use and protection of water and marine resources

For high-efficiency cogeneration of heat/cool and power from fossil gaseous fuels, in order to meet the general criteria established in Appendix B to Annex I of the Climate Delegated Regulation, environmental degradation risks related to preserving water quality and avoiding water stress must be identified and addressed. However, the Group did not identify such risks in 2024, as it considered that identification completely marginal and that analysis of those risks would not bring a significant improvement in the general alignment of the Group’s activities.

#### \* Transition to a circular economy

Although neither of the two activities analysed meets the DNSH criteria, the Ebro Group is developing new packaging made of recycled plastic, developing zero impact programmes and replacing packaging materials with biological-based bioplastic. For more information on the assessment of climate risks, see ESRS E1.

#### \* Pollution prevention and control

High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels must conform to the general criteria established in Appendix C to Annex I of the Climate Delegated Act (not place on the market or use substances, whether on their own, in mixtures or in articles of the polluting substances). Moreover, the emissions must be within or lower than the emission levels associated with the best available techniques (BAT) ranges. The Ebro Group did not confirm those criteria in 2024 because this activity was considered completely marginal and analysis thereof would not bring a significant improvement in the general alignment of the Group’s activities.



#### \* Protection and restoration of biodiversity and ecosystems

High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels must conform to the general criteria established in Appendix D to Annex I of the Climate Delegated Act, which include the completion of an Environmental Impact Assessment (EIA) that includes a description of the project and measures to avoid and reduce the adverse impact of the facilities. The Ebro Group did not make that assessment in 2024 because it was considered completely marginal and analysis thereof would not bring a significant improvement in the general alignment of the Group's activities.

#### MINIMUM SOCIAL SAFEGUARDS

In accordance with Article 18 of the Taxonomy Regulation, undertakings must implement a number of procedures to ensure the alignment of their economic activities with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. The Group has a number of policies, procedures and mechanisms to ensure compliance with the minimum social safeguards required: Human Rights, corruption and bribery, taxation and fair competition. To be more specific, the Group has a global Code of Conduct with public access, binding on all our stakeholders and characterised by values such as the protection of Human Rights and the fight against corruption and bribery. These issues are described in Chapter 5 (Human Rights in the value chain) and Chapter 6 (Anti-corruption and bribery measures) of this Statement. In addition, our Group, led by those responsible for taxation, monitor legislation and possible interpretations, requesting specific reports from specialists.

Following this assessment, we concluded that the activities identified by the Ebro Group as eligible cannot be considered taxonomy-aligned because:

- \* We do not have a sufficient breakdown of the information to comply with the technical screening criteria for activity 4.30.
- \* We have not been able to meet the requirements of doing no significant harm to the other environmental objectives.

## **CALCULATION METHODOLOGY AND MAIN RESULTS**

In order to calculate the three KPIs required by the Taxonomy, we extracted information from the accounting systems of the Group companies that are included in the Internal Control over the Financial Reporting System.

To make sure no items have been duplicated, the same controls have been applied to the extracted data as to the rest of the Group's consolidated reporting.

### **KEY PERFORMANCE INDICATORS RELATED TO TURNOVER**

The proportion of turnover was calculated as the part of the net turnover derived from products or services, including intangibles, associated with Taxonomy-aligned economic activities (numerator), divided by the net turnover as recognised in the consolidated statement of profit or loss in the annual accounts (denominator), as defined in section 1.1.1. of Annex I of the Disclosures Delegated Regulation.

### **KEY PERFORMANCE INDICATORS RELATED TO CAPITAL EXPENDITURE (CAPEX)**

The proportion of CapEx was calculated through identification of the capital expenditure of the economic activities contemplated in the Climate Delegated Act (numerator) divided by the total CapEx of the Group (denominator), as specified in points 1.1.2.1. and 1.1.2.2. of Annex I of the Disclosures Delegated Act (additions to the tangible and intangible assets during the year before depreciation, amortisation and possible revaluations, including those resulting from any increases in value or impairment losses, for the relevant year, excluding changes in fair value and including additions to tangible and intangibles as a result of business combinations and RoU –rights of use–). The CapEx denominator is thus the total movements of new investments indicated in Notes 9, 10 and 11 to the Consolidated Annual Accounts.

### **KEY PERFORMANCE INDICATORS RELATED TO OPERATING EXPENDITURE (OPEX)**

The proportion of OpEx was calculated as the operating expenditure included in the denominator associated with taxonomy-aligned economic activities (numerator), divided by the direct non-capitalised costs that represent research and development, building renovation measures, short-term lease, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment incurred by the company in question or a third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets (denominator).

In 2024, the Ebro Group analysed the eligible proportion of its operating expenditure associated with the economic activities included in the Climate Delegated Regulation (€432.5 thousand associated with cogeneration and €47.4 thousand associated with the photovoltaic panels), and the total taxonomic OpEx (€90,682.4 thousand).



## Proportion of turnover

FINANCIAL YEAR 2024	2024			SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA ("DO NOT SIGNIFICANT HARM")										
ECONOMIC ACTIVITIES	CODES	ABSOLUTE TURNOVER (€M)	PROPORTION OF TURNOVER, 2024	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	MINIMUM SAFEGUARDS	TAXONOMY-ALIGNED (A.1.) OR TAXONOMY-ELIGIBLE (A.2.) PROPORTION OF TURNOVER, 2023	CATEGORY ENABLING ACTIVITY	CATEGORY TRANSITIONAL ACTIVITY	
A. TAXONOMY-ELIGIBLE ACTIVITIES										S/N	S/N	S/N	S/N	S/N	S/N	S/N				
A.1. Environmentally sustainable activities (taxonomy-aligned)																				
Turnover of environmentally sustainable activities (taxonomy-aligned) (A.1)		€0.00	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							0.0%				
Of which: enabling		€0.00	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							0.0%	F			
Of which: transitional		€0.00	0.0%	0.0%												0.0%		T		
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)																				
Turnover of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		€0.00	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							0.0%				
A. Turnover of taxonomy-eligible activities (A.1+A.2)		€0.00	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							0.0%				

Proportion of turnover

FINANCIAL YEAR 2024	2024		SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA ("DO NOT SIGNIFICANT HARM")										
ECONOMIC ACTIVITIES	CODES	ABSOLUTE TURNOVER (€M)	PROPORTION OF TURNOVER, 2024	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	MINIMUM SAFEGUARDS	TAXONOMY-ALIGNED (A.1.) OR TAXONOMY-ELIGIBLE (A.2.) PROPORTION OF TURNOVER, 2023	CATEGORY ENABLING ACTIVITY	CATEGORY TRANSITIONAL ACTIVITY

B. TAXONOMY-NON-ELIGIBLE ACTIVITIES

Turnover of taxonomy-non-eligible activities (B)	€3,140.50	100%
TOTAL	€3,140.50	100%

PROPORTION OF REVENUES/TOTAL REVENUES		
	Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	0.0%	0.0%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
CE	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

## Proportion of CapEx

FINANCIAL YEAR 2024	2024			SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA ("DO NO SIGNIFICANT HARM")										
ECONOMIC ACTIVITIES	CODES	CAPEX (€M)	PROPORTION OF CAPEX, 2024	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	MINIMUM SAFEGUARDS	TAXONOMY-ALIGNED (A.1.) OR TAXONOMY-ELIGIBLE (A.2.) PROPORTION OF CAPEX, 2023	CATEGORY ENABLING ACTIVITY	CATEGORY TRANSITIONAL ACTIVITY	
A. TAXONOMY-ELIGIBLE ACTIVITIES									S/N	S/N	S/N	S/N	S/N	S/N	S/N					
A.1. Environmentally sustainable activities (taxonomy-aligned)																				
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		€0.00	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							0.0%				
Of which: enabling		€0.00	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							0.0%				F
Of which: transitional		€0.00	0.0%	0.0%												0.0%				
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)																				
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	€0.16	0.10%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							2.30%				
CapEx of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		€0.16	0.10%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							2.30%				
A. CapEx of taxonomy-eligible activities (A.1+A.2)		€0.16	0.10%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							2.30%				

Proportion of CapEx

FINANCIAL YEAR 2024	2024			SUBSTANTIAL CONTRIBUTION CRITERIA					DNSH CRITERIA ("DO NO SIGNIFICANT HARM")										
ECONOMIC ACTIVITIES	CODES	CAPEX (€M)	PROPORTION OF CAPEX, 2024	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	MINIMUM SAFEGUARDS	TAXONOMY-ALIGNED (A.1.) OR TAXONOMY-ELIGIBLE (A.2.) PROPORTION OF CAPEX, 2023	CATEGORY ENABLING ACTIVITY	CATEGORY TRANSITIONAL ACTIVITY

B. TAXONOMY-NON-ELIGIBLE ACTIVITIES

CapEx of taxonomy-non-eligible activities (B)		€152.64	99.90%
TOTAL		€152.80	100%

PROPORTION OF CAPEX/TOTAL CAPEX	
Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	0.0%
CCA	0.0%
WTR	0.0%
CE	0.0%
PPC	0.0%
BIO	0.0%



## Proportion of OpEx

FINANCIAL YEAR 2024	2024			SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA ("DO NO SIGNIFICANT HARM")									
ECONOMIC ACTIVITIES	CODES	OPEX (€M)	PROPORTION OF OPEX, 2024	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	MINIMUM SAFEGUARDS	TAXONOMY- ALIGNED (A.1.) OR TAXONOMY- ELIGIBLE (A.2.) PROPORTION OF OPEX, 2023	CATEGORY ENABLING ACTIVITY	CATEGORY TRANSITIONAL ACTIVITY
A. TAXONOMY-ELIGIBLE ACTIVITIES									S/N	S/N	S/N	S/N	S/N	S/N	S/N				
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
OpEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		0.00 €	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							0.0%			
Of which: enabling		0.00 €	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							0.0%	F		
Of which: transitional		0.00 €	0.0%	0.0%												0.0%		T	
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)																			
High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels	CCM 4.30	0.43 €	0.47%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.44%			
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	0.05 €	0.06%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.02%			
OpEx of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		0.48 €	0.53%	0.53%	0	0	0	0	0							0.46%			
A. OpEx of taxonomy-eligible activities (A.1+A.2)		0.48 €	0.53%	0.53%	0	0	0	0	0							0.46%			

Proportion of OpEx

FINANCIAL YEAR 2024	2024			SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA ("DO NO SIGNIFICANT HARM")									
ECONOMIC ACTIVITIES	CODES	OPEX (€M)	PROPORTION OF OPEX, 2024	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	CLIMATE CHANGE MITIGATION	CLIMATE CHANGE ADAPTATION	WATER	POLLUTION	CIRCULAR ECONOMY	BIODIVERSITY	MINIMUM SAFEGUARDS	TAXONOMY- ALIGNED (A.1.) OR TAXONOMY- ELIGIBLE (A.2.) PROPORTION OF OPEX, 2023	CATEGORY ENABLING ACTIVITY	CATEGORY TRANSITIONAL ACTIVITY

B. TAXONOMY-NON-ELIGIBLE ACTIVITIES

OpEx of taxonomy-non-eligible activities (B)		90.20 €	99.47%
TOTAL		90.68 €	100%

PROPORTION OF OPEX/TOTAL OPEX		
Taxonomy-aligned by objective		Taxonomy-eligible by objective
CCM	0.0%	0.53%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
CE	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

### Activities related with nuclear energy and fossil gas (Delegated Regulation (EU) 2022/1214)

ROW	NUCLEAR ENERGY RELATED ACTIVITIES	
1	The undertaking carries out, funds or has exposure to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposure to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposure to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
FOSSIL GAS RELATED ACTIVITIES		
4	The undertaking carries out, funds or has exposure to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5	The undertaking carries out, funds or has exposure to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposure to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

During 2024, activities 4.30 and 7.6 (High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels and Installation, maintenance and repair of renewable energy technologies) did not generate eligible income because the activities are for self-supply. With regard to the amount and proportion of CapEx, the proportion of CapEx and OpEx associated with these activities is indicated in the tables above.

### DISAGGREGATION OF REVENUES DERIVED FROM ACTIVITIES

TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (DENOMINATOR) IN MILLION EUROS							
ROWS	ACTIVITIES	PROPORTION (THE INFORMATION MUST BE PRESENTED IN MONETARY AMOUNTS AND IN PERCENTAGES)					
		(CCM + CCA)		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION	
		AMOUNT	%	AMOUNT	%	AMOUNT	%
5	Amount and proportion of the taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the denominator of turnover	€0.00	0%	€0.00	0%	€0.00	0%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1-6 in the denominator of turnover	€0.00	0%	€0.00	0%	€0.00	0%
8	Total turnover	€3,140.50	100%	€3,140.50	100%	€0.00	0%

**TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (NUMERATOR) IN MILLION EUROS**

ROWS	ACTIVITIES	PROPORTION (THE INFORMATION MUST BE PRESENTED IN MONETARY AMOUNTS AND IN PERCENTAGES)					
		(CCM + CCA)		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION	
		AMOUNT	%	AMOUNT	%	AMOUNT	%
5	Amount and proportion of the taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the numerator of turnover	€0.00	0%	€0.00	0%	€0.00	0%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1-6 in the numerator of turnover	€0.00	0%	€0.00	0%	€0.00	0%
8	Total amount and proportion of the taxonomy-aligned economic activities in the numerator of turnover	€0.00	0%	€0.00	0%	€0.00	0%

**TAXONOMY-ELIGIBLE ECONOMIC BUT NOT TAXONOMY-ALIGNED ACTIVITIES, IN MILLION EUROS**

ROWS	ACTIVITIES	PROPORTION (THE INFORMATION MUST BE PRESENTED IN MONETARY AMOUNTS AND IN PERCENTAGES)					
		(CCM + CCA)		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION	
		AMOUNT	%	AMOUNT	%	AMOUNT	%
5	Amount and proportion of the taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the denominator of turnover	€0.00	0%	€0.00	0%	€0.00	0%
7	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1-6 in the denominator of turnover	€0.00	0%	€0.00	0%	€0.00	0%
8	Amount and proportion of the taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of turnover	€3,140.50	0%	€3,140.50	0%	€0.00	0%

**TAXONOMY-NON-ELIGIBLE ECONOMIC ACTIVITIES, IN MILLION EUROS**

ROWS	ACTIVITIES	AMOUNT	%
5	Amount and proportion of the economic activity referred to in row 5 of template 1 that is not taxonomy-eligible according to section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the denominator of turnover	€0.00	0%
7	Amount and proportion of other taxonomy-non-eligible not referred to in rows 1-6 in the denominator of turnover	€0.00	0%
8	Total amount and proportion of the taxonomy-non-eligible economic activities in the denominator of turnover	€3,140.50	100%

## DISAGGREGATION OF CAPEX DERIVED FROM ACTIVITIES

TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (DENOMINATOR) IN MILLION EUROS							
ROWS	ACTIVITIES	PROPORTION (THE INFORMATION MUST BE PRESENTED IN MONETARY AMOUNTS AND IN PERCENTAGES)					
		(CCM + CCA)		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION	
		AMOUNT	%	AMOUNT	%	AMOUNT	%
5	Amount and proportion of the taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the denominator of CapEx	€0.00	0%	€0.00	0%	€0.00	0%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1-6 in the denominator of CapEx	€0.00	0%	€0.00	0%	€0.00	0%
8	Total CapEx	€152.80	100%	€152.80	100%	€0.00	0%

TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (NUMERATOR) IN MILLION EUROS							
ROWS	ACTIVITIES	PROPORTION (THE INFORMATION MUST BE PRESENTED IN MONETARY AMOUNTS AND IN PERCENTAGES)					
		(CCM + CCA)		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION	
		AMOUNT	%	AMOUNT	%	AMOUNT	%
5	Amount and proportion of the taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the numerator of CapEx	€0.00	0%	€0.00	0%	€0.00	0%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1-6 in the numerator of CapEx	€0.00	0%	€0.00	0%	€0.00	0%
8	Amount and proportion of other taxonomy-aligned economic activities in the numerator of CapEx	€0.00	0%	€0.00	0%	€0.00	0%

TAXONOMY-ELIGIBLE ECONOMIC BUT NOT TAXONOMY-ALIGNED ACTIVITIES, IN MILLION EUROS							
ROWS	ACTIVITIES	PROPORTION (THE INFORMATION MUST BE PRESENTED IN MONETARY AMOUNTS AND IN PERCENTAGES)					
		(CCM + CCA)		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION	
		AMOUNT	%	AMOUNT	%	AMOUNT	%
5	Amount and proportion of the taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the denominator of CapEx	€0.00	0%	€0.00	0%	€0.00	0%
7	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1-6 in the denominator of CapEx	€0.16	0.10%	€0.16	0.10%	€0.00	0%
8	Amount and proportion of the taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of CapEx	€0.16	0.10%	€0.16	0.10%	€0.00	0%

**TAXONOMY-NON-ELIGIBLE ECONOMIC ACTIVITIES, IN MILLION EUROS**

ROWS	ACTIVITIES	AMOUNT	%
5	Amount and proportion of the economic activity referred to in row 5 of template 1 that is not taxonomy-eligible according to section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the denominator of CapEx	€0.00	0%
7	Amount and proportion of other taxonomy-non-eligible not referred to in rows 1-6 in the denominator of CapEx	€0.00	0%
8	Total amount and proportion of the taxonomy-non-eligible economic activities in the denominator of CapEx	€152.64	99.90%

**DISAGGREGATION OF OPEX DERIVED FROM ACTIVITIES**
**TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (DENOMINATOR) IN MILLION EUROS**

ROWS	ACTIVITIES	PROPORTION (THE INFORMATION MUST BE PRESENTED IN MONETARY AMOUNTS AND IN PERCENTAGES)					
		(CCM + CCA)		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION	
		AMOUNT	%	AMOUNT	%	AMOUNT	%
5	Amount and proportion of the taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the denominator of OpEx	€0.00	0%	€0.00	0%	€0.00	0%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1-6 in the denominator of OpEx	€0.00	0%	€0.00	0%	€0.00	0%
8	Total OpEx	€90.68	100%	€90.68	100%	€0.00	0%

**TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (NUMERATOR) IN MILLION EUROS**

ROWS	ACTIVITIES	PROPORTION (THE INFORMATION MUST BE PRESENTED IN MONETARY AMOUNTS AND IN PERCENTAGES)					
		(CCM + CCA)		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION	
		AMOUNT	%	AMOUNT	%	AMOUNT	%
5	Amount and proportion of the taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the numerator of OpEx	€0.00	0%	€0.00	0%	€0.00	0%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1-6 in the numerator of OpEx	€0.00	0%	€0.00	0%	€0.00	0%
8	Amount and proportion of other taxonomy-aligned economic activities in the numerator of OpEx	€0.00	0%	€0.00	0%	€0.00	0%

**TAXONOMY-ELIGIBLE ECONOMIC BUT NOT TAXONOMY-ALIGNED ACTIVITIES, IN MILLION EUROS**

ROWS	ACTIVITIES	PROPORTION (THE INFORMATION MUST BE PRESENTED IN MONETARY AMOUNTS AND IN PERCENTAGES)					
		(CCM + CCA)		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION	
		AMOUNT	%	AMOUNT	%	AMOUNT	%
5	Amount and proportion of the taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the denominator of OpEx	€0.43	0.47%	€0.43	0.47%	€0.00	0%
7	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1-6 in the denominator of OpEx	€0.05	0.06%	€0.05	0.06%	€0.00	0%
8	Amount and proportion of the taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of OpEx	€0.48	0.53%	€0.48	0.53%	€0.00	0%

**TAXONOMY-NON-ELIGIBLE ECONOMIC ACTIVITIES, IN MILLION EUROS**

ROWS	ACTIVITIES	AMOUNT	%
5	Amount and proportion of the economic activity referred to in row 5 of template 1 that is not taxonomy-eligible according to section 4.30 of Annexes I and II of Delegated Regulation (UE) 2021/2139 in the denominator of OpEx	€0.00	0%
7	Amount and proportion of other taxonomy-non-eligible not referred to in rows 1-6 in the denominator of OpEx	€0.00	0%
8	Total amount and proportion of the taxonomy-non-eligible economic activities in the denominator of OpEx	€90.20	99.47%



# ESRS E1

## CLIMATE CHANGE

### List of IROs associated with E1

#### Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH IRO
CLIMATE CHANGE					
IP-02	Contribution to mitigation and adaptation of the effects of climate change through the promotion of sustainable agriculture projects in the Group's principal sourcing areas, which also act as carbon sinks.	I+	A	Ups	Sustainability, Environment and Corporate Social Responsibility Policy
IN-01	Generation of greenhouse gases deriving from the Group's operations throughout its value chain (carbon dioxide CO <sub>2</sub> , methane CH <sub>4</sub> and nitrous oxide N <sub>2</sub> O), due to land-use changes, if any, in agricultural activities, and emissions by transport and production of products through the consumption of fossil fuels by fixed and mobile sources.	I-	A	Ups OO Down	Sustainability, Environment and Corporate Social Responsibility Policy
IN-02	Greenhouse gas emissions associated with sourcing in the Group's supply chain (emissions associated with the sourcing of rice and raw materials used in the production of pasta), and emissions produced by land-use changes, if any, in agricultural activities.	I-	A	Ups	
O-03	Improvement of the Group's reputation owing to the anticipation and reduction of risks associated with climate change, thanks to the identification, management, reporting and monitoring of the principal physical and transition risks of climate change.	O	P	Ups OO Down	Medium Sustainability, Environment and Corporate Social Responsibility Policy
O-66	Minimisation of the future vulnerability of sourcing areas due to climate-related challenges and reduction of operating costs, as a result of the mitigation and adaptation to climate change. This includes enhancement of crop resilience, strengthening of agricultural ecosystems and the identification of climate-related factors through the Task Force on Climate-related Financial Disclosures (TCFD) report.	O	P	Ups OO	Short
R-01	Increase in the purchase costs of raw materials due to the impact of climate change on the natural resources that supply them. Extreme climate events can affect the quality, quantity and geographical distribution of agricultural raw materials, increasing the costs associated with their acquisition and management.	R	A	Ups OO Down	Short Sustainability, Environment and Corporate Social Responsibility Policy Rick Control and Management Policy

#### KEY: Impact

I+: Positive Impact I-: Negative Impact O: Opportunity R: Risk P: Potential A: Actual

#### KEY: Value Chain (VC)

Ups: Upstream OO: Own Operations Down: Downstream

## Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH IRO
CLIMATE CHANGE					
R-03	Increase in costs associated with changes to emission allowances and new regulations, such as the EU Carbon Border Adjustment Mechanism. This may generate significant impacts on the Group's financial strategies, requiring adaptations and further investments to comply with the new environmental legislation.	R	A	Ups OO Down	Short
IP-04	Reduction of the use of non-renewable energy resources and greenhouse gas emissions as they are replaced with renewable fuels (biomass: rice husk, wood chips, wood charcoal, etc.), self-generation of photovoltaic energy and cogeneration, as well as the purchase of electricity with GOs (guarantees of origin).	R	A	OO	
IP-05	Reduction of energy consumption as a result of implementing energy saving practices (changing convention lights to LED, energy saving project, improved energy efficiency, etc).	R	A	OO	Sustainability, Environment and Corporate Social Responsibility Policy

### KEY: Impact

I+: Positive Impact   I-: Negative Impact   O: Opportunity   R: Risk   P: Potential   A: Actual

### KEY: Value Chain (VC)

Ups: Upstream   OO: Own Operations   Down: Downstream

## GOV-3 Integration of sustainability-related performance in incentive schemes

\*(13)

The Ebro Foods Group incorporates sustainability criteria within its remuneration scheme through its Long-Term Bonus Schemes tied to its three-year Strategic Plans, in which the top tier executives, including the Executive Chairman and the Chief Operating Officer (COO) participate.

Since the previous Long-Term Bonus Scheme (tied to the previous Strategic Plan 2022-2024), part of the bonus regulated therein has been subject to meeting non-financial, sustainability-related targets. Circular economy and climate change mitigation have been considered key areas within those targets. The targets established in this area have been aligned with the Group's commitments to reduce Scope 3 emissions and increase its use of green energies.

For each three-year period, the Nomination and Remuneration Committee selects the non-financial targets that are to be incorporated in the Long-Term Bonus Scheme from those included in the relevant Strategic Plan, prioritising those that are relevant for the Group and that enable the most objective measurement possible.

After the three-year period, the Committee assesses the level of achievement of those targets and their impact on the variable remuneration of the beneficiaries of the Scheme, following evaluation by the other Board Committees.

In the Long-Term Bonus Scheme tied to the Strategic Plan 2022-2024, the portion of the bonus tied to achievement of the non-financial targets was 6.25% of the total bonus for the three-year period. The proportion for the next Long-Term Bonus Scheme 2025-2027 is still being defined, but it is expected to follow the same structure of being tied to sustainability-related targets.

At the date of preparing this Statement, the Nomination and Remuneration Committee was in the process of defining the new Long-Term Bonus Scheme tied to the Strategic Plan 2025-2027, under which part of the bonus will still be tied to the achievement of sustainability-related targets, including climate-related targets, giving priority to objective measurement and relevance within the Group's sustainability strategy.

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## E1-1. Transition plan for climate change mitigation

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\*(17)

At present the Group does not have a Climate Action Plan in place as said plan is still at the study and definition stage. We aim to develop a clear, feasible strategy for reducing emissions and mitigating their environmental impact, based on the analysis of our carbon footprint and the initiatives already underway. Although we are unable to specify precisely when this work will be completed, it is expected to be before the end of 2025.

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## SBM-3. Material impacts, risks and opportunities and their interaction with strategy and business model

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\*(18,19)

All the sustainability matters considered material for the Group were identified and evaluated in the Double Materiality Assessment. The list of material IROs in 2024 includes climate-related aspects for the Group's own operations and value chain. For more information on the process of determining materiality, see ESRS 2 SBM-3 and IRO-1.

### PRINCIPAL IMPACTS IDENTIFIED

The main impacts are those related with greenhouse gas emissions in the Group's direct activity (production) or through its value chain (from crop to transport).

Appropriate soil use is a measure for mitigating those emissions. In this regard, the Group promotes sustainable crop practices with its mitigation strategy and they can in turn be converted into a positive impact and an opportunity for differentiating the Group's products.

The Group's industrial activity is not energy-intensive, except in certain product ranges that require freezing or pre-cooking of the raw material. The Group is developing a mitigation strategy entailing the use of energy sources considered green, such as photovoltaic energy, with a progressive rollout of PV plants at its facilities.

### PRINCIPAL MATERIAL RISKS RELATED WITH CLIMATE CHANGE

- ✱ Physical risks: Increase in raw material purchase costs due to the impact of climate change on the natural resources that provide them. Extreme climate events can affect the quality, quantity and geographical distribution of agricultural raw materials, increasing the costs associated with their acquisition and management.
- ✱ Transition risks: Increase in costs associated with changes to emission allowances and new regulations, such as the EU Carbon Border Adjustment Mechanism. This may generate significant impacts on the Group's financial strategies, requiring adaptations and further investments to comply with the new environmental legislation.

The physical risk considered contemplates the possibility that the supply of crops comprising the main source of the Group's raw materials (rice and durum wheat) might be impaired by changes in the nature of precipitations or temperatures in the production areas of those crops. Moreover, rice is the principal source of nutrition in some of the sourcing areas, so when it is in short supply, exports may be prohibited or restricted.

Supply shortages deriving from smaller areas sown, lower yields, loss of crops due to adverse weather phenomena or restrictions on exports affect the price of products at source and, consequently, the cost of the Group's sales and inventories.

That higher cost results in a need to finance a larger quantity of inventories and might impact profit margins, depending on the Group's ability to pass those price increases on to its customers.

The Ebro Group believes that its business model favours mitigation of this risk and, consequently, its resilience, since it is based on: (i) broad diversification of our sources of supply, (ii) multi-location of our production assets, (iii) the management capacity of our differential logistics network, (iv) the excellent perception of our brands and (v) constant innovation, producing products adapted to consumers' demands for quality and convenience.

In its initial assessment of the transition risks, the Group considered material those deriving from: (i) changes in the laws on sustainability reporting obligations, (ii) changes in energy prices due to different climate scenarios and (iii) possible changes in consumer habits within a society geared towards meeting the zero emissions target. None of them were considered critical as the remediation measures implemented (specific regulatory compliance plans, limited exposure to energy and an adequate product portfolio) were deemed robust.

However, our Double Materiality Assessment revealed a clear need to consider the risk deriving from changes in European laws and regulations on the Carbon Border Adjustment Mechanism, especially due to its impact on the value chain (e.g. fertilizers in common use), which is described in greater detail in IRO-1. Assessment is currently pending.

The IPCC scenarios were taken into account for physical risks in the analysis of climate-related risks. For transition risks, the International Energy Agency, Stated Policies Scenario (STEPS) and The Net Zero Emissions (NZE) scenarios were considered.

### **PRINCIPAL OPPORTUNITIES IDENTIFIED**

Improvement of the Group's reputation, thanks to its anticipation and work to reduce the risks associated with climate change, identifying, managing, reporting and monitoring the principal physical and transition risks of climate change.

Minimising the future vulnerability of our sourcing areas in the face of climate-related challenges and reduction of operating costs, as a result of our climate change mitigation and adaptation measures. This includes improving crop resilience, strengthening the agricultural ecosystems and identifying climate factors through the report by the Task Force on Climate-related Financial Disclosures.

### **RESILIENCE ANALYSIS**

For all the risks identified, the mitigation measures were assessed for the ones considered material, with an analysis of strengths and weaknesses in the event of this kind of risks. We also identified and compiled abundant scientific literature on the risks considered material and their possible impact on commodity supplies, energy sources and passing on costs in the event of price inflation. However, we have not made a full resilience analysis or determined the possible economic impacts, owing to the huge complexity of the scenarios and the absence of clear legislation on their quantification and the variables to be taken into account.



## IRO-1. Description of the processes to identify and assess material climate-related impacts, risks and opportunities

\*(20,21)

All sustainability matters considered significant for the Group were identified and assessed in the Double Materiality Assessment. Climate-related aspects were included in the list of material IROs in 2024 for the Group's own operations. For more information on the process of determining materiality, see ESRS 2 SBM-3 and IRO-1.

### RELATIONSHIP WITH THE IMPACT OF CLIMATE CHANGE

We identified the sources of greenhouse gases in the Group's own operations and along its value chain, which are the most important ones for the Group, particularly emissions associated with category 3.1 Purchase of tangible assets. For more information, see disclosure requirement E1-6.

### RISKS AND OPPORTUNITIES RELATED WITH CLIMATE CHANGE

The risks and opportunities management model for climate change is based on the COSO recommendations, the Task force on Climate Related Financial Disclosures (TCFD) and the Group's Risk Control and Management Policy.

Climate variables are a fundamental part of the environmental criteria that the Ebro Group contemplates in its management strategy. In 2023 we analysed the climate risks and opportunities under the reference framework of the Task Force on Climate-related Financial Disclosures (TCFD), which provides guidelines for identifying, managing, reporting and monitoring the principal physical and transition risks to which the Group may be exposed as a result of climate change, as well as potential business and development opportunities. This analysis was completed during 2024 with the Double Materiality work on sustainability-related risks.

The rice and wheat sectors were included for this analysis, covering processing plants, the principal warehouses and the sourcing areas of these commodities in Spain and worldwide. We assessed: (i) the main production regions of those commodities according to purchases made in 2022 and 2023 and (ii) all the Group's production facilities related with those commodities.

The list of sourcing areas and industrial facilities analysed, by business division, is set out below:

#### \* Rice

- **Sourcing areas in:** India, Pakistan, Thailand, Argentina, United States, Myanmar, Spain, Italy, Uruguay and Morocco.
- **Industrial facilities in:** Spain, Germany, Argentina, Belgium, Cambodia, Denmark, United States, India, Italy, Morocco, Netherlands, Portugal, United Kingdom and Thailand.

#### \* Wheat

- **Sourcing areas in:** Australia, United States, France, India, Italy and Turkey.
- **Industrial facilities in:** Spain, Germany, Canada, France, Italy and United Kingdom.

Climate change is causing irregularities in the global precipitation patterns, resulting in both longer and more intense periods of drought and periods of torrential rain, which can ruin entire productions in a single day. Crop yield and, therefore, their quantity and quality, is directly related with the availability of water. In turn, climate change is favouring longer warm periods and, especially, intense heatwaves. Those long periods of high temperatures, higher than average, bring about greater potential evapotranspiration of water in the soil and, as a result, there is less water available for the growth of plants. In addition, very high temperatures in the flowering stage (spring, in the case of wheat) directly affects the development of the sexual characters of the plants, thereby lowering the fertility rate. These consequences are mentioned in the abundant scientific literature and studies made by international organisations that the Group used in the assessment of these IROs.

We selected RCP 8.5 (pessimistic scenario) and RCP 4.5 (intermediate scenario), developed by the International Panel of Experts on Climate Change (IPCC), as reference climate scenarios and took the years 2030, 2040 and 2050 as time horizons, in line with national and international climate-related commitments. Based on the global scenarios of the IPCC, we developed other regional scenarios, in an attempt to achieve the highest precision possible. The existence of scenarios on a smaller scale depends on the country and region, and the level of precision also varies depending on the climate component analysed.

The transitional scenarios taken as reference were the conservative scenario STEPS and the NZE, assuming that the global energy sector will reach zero net emissions by 2050 and is consistent with limiting the global rise in temperature to 1.5°C. The time horizons used coincide with those used in the analysis of physical risks.

When making the Double Materiality Assessment and checking the applicable legislation, it became clear that we needed to consider, within transition risks, the risk deriving from changes in European laws and regulation on the Carbon Border Adjustment System, especially its impact on the value chain (e.g. fertilizers in common use). It is currently pending quantitative assessment, which the Group hopes to make in 2025.

The analysis of physical and transition risks was made through evaluation of the likelihood of occurrence of the hazards identified for different climate scenarios and the exposure and vulnerability of our facilities, sourcing areas and different sectors of operation. The most significant physical risks are in precipitation and temperature patterns and the most important transition risk is related with the Carbon Border Adjustment System. See the description in the chapter ESRS E1 SBM-3.

Within transition risks and opportunities, the assessment has focused more on possible events in a scenario in line with limiting global warming to 1.5°C, based on third-party studies of policies, costs and investments and consumer habits in a world adapted to this situation. In particular, we considered the World Energy Outlook (WEO) scenarios published by the International Energy Agency, where impacts on fuel prices, renewable energies, etc. are assessed, based in turn on the IPCC modelling and trends in international target achievement.

Based on this initial analysis and the matrices developed for this purpose, the climate-related risks to which the Ebro Group is exposed have been included in the Group's Risk Management System. The matrices are supplemented with a risk map (rainfall, high temperatures, flooding, drought and wildfires) associated with our sourcing and industrial areas assessed and the heat maps developed, which are a key element in risk monitoring and the early detection of significant changes in any of the identified risks.

On the other hand, there are a number of opportunities associated with climate change that the Group has also analysed. We aim to take advantage of the more feasible opportunities and position ourselves adequately to face the major disruption of climate change. For each opportunity we have analysed its feasibility (technical and economic) and current development levels.

The analysis made by the Group did not reveal assets or activities that were incompatible with a transition towards a climatically neutral economy or that required significant efforts to make them compatible with that transition.

As indicated in **Note 24** to the accompanying consolidated annual accounts, the results deriving from environmental risks and climate change and from other risks that the Company considers material are incorporated in the business plans, budgets and projections used to assess the return on assets (ROA), and to date there has been no indication of a potential material impact on their value or useful life. Nevertheless, even though the best information available to date has been used in their assessment, owing to their complexity constant monitoring is required and could lead to a future modification in the estimates made.



## E1-2. Policies related to climate change mitigation and adaptation

\*(24,25)

SUSTAINABILITY, ENVIRONMENT AND CORPORATE SOCIAL RESPONSIBILITY POLICY	
MDR-P 65(a)	<p><b>Contents:</b></p> <p>Through this Policy, the Group makes sustainable growth the pillar of its business management strategy, undertaking commitments to its principal stakeholders, namely its professionals, shareholders, communities, public and environment.</p> <p>The environment-related principles, commitments, targets and strategy, particularly those related with climate change, establish the undertaking to develop programmes that enhance energy efficiency and to develop actions to reduce emissions.</p> <p>Monitoring and oversight fall within the remit of the Audit, Control and Sustainability Committee, which reports to the Board of Directors.</p>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>Ebro Group</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b></p> <p>The Board of Directors is the body responsible for its approval.</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits:</b></p> <ul style="list-style-type: none"> <li>• Section 529 ter Corporate Enterprises Act (LSC).</li> <li>• Principle 24 of the Code of Good Governance of the National Securities Market Commission (CNMV)</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b></p> <p>The Policy is available on the Group's corporate website (<a href="#">Politica-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a>).</p>
RISK CONTROL AND MANAGEMENT POLICY	
MDR-P 65(a)	<p><b>Contents:</b></p> <p>Lays down the basic principles, the general framework for control and management of the business risks, including climate risks, to which the Group is exposed. These principles and basic rules of the system are intended to establish the criteria to be followed by those responsible for management of the Group's businesses in the treatment and management of risks affecting them.</p> <p>Determines the climate risk as a type of operating risk deriving from the effects of drought and flooding in the sourcing countries. These situations can generate problems of availability and commodity price volatility in both rice and wheat.</p> <p>Monitoring and oversight fall within the remit of the Audit, Control and Sustainability Committee.</p>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>Ebro Group</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b></p> <p>The Board of Directors is the body responsible for its approval.</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits:</b></p> <ul style="list-style-type: none"> <li>• Section 529 ter Corporate Enterprises Act (LSC)</li> <li>• Principle 24 of the Code of Good Governance of the National Securities Market Commission (CNMV)</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b></p> <p>The Policy is available on the Group's different intranets, available exclusively for Group employees.</p>

The Policies guide the Group's processes, activities and decisions to protect its environment and to prevent and minimise environmental impacts. They specifically address climate change mitigation and energy efficiency. Actions are also taken for renewable energy deployment and climate change adaptation (even though they are not mentioned in the Policies) that are described in disclosure requirement E1-3.



### E1-3. Actions and resources in relation to climate change policies

\*(28,29)

The following actions were taken in own operations during 2024 (€ thousand):

#### MDR-A: Decarbonisation levers

ACTION		SCOPE*	COMPANY	TIME HORIZON	CAPEX (€ THOUS)
Renewable energy	Completion of photovoltaic plants at the Rinconada and Algemesi facilities (Spain)	OO	Herba Ricemills	Long term	75
Energy efficiency	New line to halve the use of steam at the St Genis plant (France)	OO	Lustucru Premium Group	Long term	941
Energy efficiency	Replacement of cooler and insulation in a fresh pasta line	OO	Lustucru Premium Group	Long term	294
Energy efficiency	Replacement batteries in warehouse machinery	OO	Ebro India	Long term	55
Energy efficiency	Renovation of cold line to increase productivity and efficiency at the Beckley plant (UK)	OO	Ebro Frost UK	Long term	1,462
Renewable energy	Work on photovoltaic plant at the Offingen facilities (Germany)	OO	Ebro Frost Germany	Long term	31
Energy efficiency	Changes in compressors in packaging line in Hungary	OO	Riceland Magyarország	Long term	249
Energy efficiency	Changes in compressors in packaging line at the Jazz plant (UK)	OO	Tilda Ltd	Long term	743
Renewable energy	Work on photovoltaic plant at the Colusa facilities (USA)	OO	Riviana Foods	Long term	57
TOTAL					3,907

**KEY: Scope\***

Ups: Upstream OO: Own Operations Down: Downstream

The amount of investment indicated in the above table is part of the total investments made by the Group, indicated in **Note 9** to the accompanying consolidated annual accounts. The amounts indicated for the renewable energies lever correspond to those stated as investments in the reporting period in the section on Green Taxonomy corresponding to Activity 7.6 of climate change mitigation (Installation, maintenance and repair of renewable energy technologies) and represent 0.1% of the investments made in 2024.

In the future, the Group intends to invest in assets to increase its energy efficiency and obtain energy from sources not tied to fossil fuels. More specifically, there is a plan to invest in photovoltaic plants at the rice-production facilities in Benelux, Spain and Italy, and at the dry pasta plant in Gragnano, where an investment in cogeneration is also planned. These investments should be developed as from 2025 in a sum not yet fully defined, but estimated at around €10 million.

These actions supplement those already in progress, as listed below:

#### Photovoltaic facilities

- \* **Arutz:** Navaleno
- \* **Bertagni:** Avio and Vicenza
- \* **Ebro Frost Germany:** Offingen
- \* **Ebro India:** Taraori
- \* **Garofalo:** Gragnano
- \* **Geovita:** Bruno
- \* **Herba Bangkok:** Nong Khae

- \* **Herba Ricemills:** Rinconada and Algemesi
- \* **Mundi Riso:** Vercelli
- \* **Riviana Foods:** Colusa
- \* **Transimpex:** Lambsheim

#### Cogeneration facilities

- \* **Bertagni:** Avio and Vicenza
- \* **Ebro Frost Germany:** Offingen
- \* **Garofalo:** Gragnano
- \* **Geovita:** Vilanova Monferrato

#### Use of renewable fuel sources

- \* **Ebro Frost Denmark:** Orbaek (wood chips)
- \* **Ebro India:** Taraori (rice husk and wood charcoal)
- \* **Mundi Riso:** Vercelli (rice husk)
- \* **Herba Ricemills:** San Juan de Aznalfarache (rice husk)

During 2024 the Group also incurred in other operating expenses related with climate change mitigation, including:

- \* Maintenance of cogeneration and photovoltaic plants, as indicated in the Green Taxonomy section of this Statement, in a sum of €480 thousand (recurrent expenses); and
- \* Consultancy and environmental analysis related with climate change mitigation, such as the consultation for calculation of the Group's Scope 3 Carbon Footprint and the Double Materiality Assessment, in a sum of €330 thousand.

These expenses are included within Other operating expenses (**Note 7**) in the income statement of the accompanying consolidated annual accounts.

We do not have any methodology to calculate the reduction of emissions associated with the actions implemented in own operations or forecast for the future.

We have also developed actions in the value chain through own initiatives and specific collaborations with stakeholders and sector-specific associations, such as SAI Platform (SAI-P) and the Sustainable Rice Platform (SRP), which developed their sustainable agriculture standards FSA and SRP, respectively. These programmes aim essentially to contribute towards conservation of the environment and mitigation of the effects of climate change.

During 2024, the Group implemented research and promotion projects on environmentally sustainable crop practices applicable to the rice crop in its principal sourcing areas, investing a sum of €6,458 thousand. The Group finances these campaigns or promotes best practices by rewarding the growers participating in the programmes with better purchase prices for their harvests. According to the type of programme, the corresponding expense is recognised as an increased cost of procurement or an operating expense in the income statement of the accompanying consolidated annual accounts.

The International Rice Research Institute (IRRI) has identified a number of practices that help mitigate GHG emissions in the rice crop. Several of those practices are included by the Group in our sustainable agriculture projects:

- \* AWD (alternate wetting and drying): reduction of methane emissions by 30-70%, depending on the number of events
- \* Laser levelling

- \* Site-specific nutrient management
- \* Short-cycle varieties
- \* Straw management
- \* Dry sowing

The project Control Farming-AWD, developed in India, includes more than 1,000 small growers (approx. 16,000 ha) and has achieved a 45% reduction in methane emissions, according to the methodology of the Intergovernmental Panel on Climate Change (IPCC).

In the Oryzonte project, AWD has been implemented in 520 ha, achieving a 29% reduction of methane emissions, according to the IPCC.

In the other projects there is no methodology available to calculate the impact on GHG emissions.

The most important sustainability projects in 2024 were:

#### MDR-A: Sustainable agriculture

ACTION	SCOPE*	OVERSIGHT	TIME HORIZON	EXPENSE (€)
Origins Project for training in best practices, optimisation of resources and incorporation of women and young people in agriculture	Down	Herba Ricemills (Spain)	Long-term	21,000
Oryzonte Project for reduction of the use of water and reduction of emissions through AWD, as well as SRP verification and improvements in biodiversity	OO	Herba Ricemills (Spain)	Short & medium term	50,856
<ul style="list-style-type: none"> <li>• SRP verification</li> <li>• Certified seed</li> <li>• Laser levelling</li> <li>• AWD</li> <li>• Reduction of water consumption</li> </ul>	Down	Herba Ricemills (Pakistan)	Short & medium term	135,375
Certification of organic farming	OO	Ebro India	Short term	10,547
Certification of organic farming and fair trade	OO	Ebro India	Short term	53,161
Training in best practices for the reduction of pesticides, seed certification, biological pest control and GHG emission reduction	OO	Ebro India	Long-term	5,505,211
FSA Verification	OO	Mundi Riso	Short term	7,100
S&P programme for training in best practices and introduction of women into agriculture	OO	Herba Bangkok	Long-term	167,396
Green Climate Fund Project for the application of climate-smart crop-growing technologies and practices	OO	Herba Bangkok	Short & medium term	
Organic certification and SRP verification	OO	La Loma Alimentos	Short term	35,702
TOTAL				6,458,490

#### KEY: Scope\*

Ups: Upstream   OO: Own Operations   Down: Downstream

The Group's impact on the emission reduction targets will ultimately depend on the quantity of resources assigned. At present, the Group does not have a Decarbonisation Plan setting out an estimate of the financial resources assigned for achievement. Until that Plan has been formally approved, the Group has a number of initiatives that account for the expenses and investments for the current year and subsequent years, described above.

## E1-4. Targets related to climate change mitigation and adaptation

\*(33)

The Group has not yet set quantifiable targets for GHG emission reduction, because as indicated in section E1-1, our Climate Action Plan is currently at the study and development stage. This process includes the assessment of adequate methodologies for setting targets and the definition of a solid strategic framework. Although we are unable to give an exact date when this work will be completed, the plan is expected to be defined before the end of 2025, when the feasibility and scope of possible measurable targets will be determined.

### TRACKING THE EFFECTIVENESS OF POLICIES AND ACTIONS

The Group tracks the effectiveness of its climate-related policies and actions to assess risks, identify opportunities and improve its performance in sustainability.

- \* Monitoring processes: Annual monitoring through measurement of our Scope 1, 2 and 3 Carbon Footprint. This measurement allows us to analyse trends, assess the impact of the initiatives we have implemented and detect any room for improvement. We also monitor key indicators such as energy consumption and use of resources, saving this information for strategic decisions to be made in the future. This monitoring is supplemented with internal audits and regular reviews.
- \* Level of ambition and indicators used: The Group has set the progressive reduction of our environmental impact as one of our priorities in sustainability and we are working to define targets aligned with the regulatory frameworks, best practice in the sector and our business activities. We currently have quantitative and qualitative indicators to measure progress, such as the reduction of GHG emissions in all three Scopes, improvement of energy efficiency and optimisation of the consumption of resources. These indicators are reviewed annually, enabling us to assess our progress in respect of the base year 2023 and adjust our strategies according to the results obtained. Looking forward, the Group plans to define quantifiable emission reduction and energy efficiency targets in line with our climate-related commitments and transition towards a more sustainable business model.

## E1-5. Energy consumption and mix

\*(37,38,39,40,41,42,43)

The production processes used in the different plants of the Group, in both the Rice and Pasta divisions, are simple, agri-food processes. Most energy consumption is in the drying/milling and cooking processes and the fuel most used in our plants is natural gas.

The calculation of energy consumption covers all the facilities under the operational control of the Ebro Group and includes:

- \* Consumption of non-renewable (fossil) fuels in stationary and mobile sources
- \* Consumption of renewable fuels in stationary sources:
  - a. Rice husk, by-product of our industrial processes, used by the subsidiaries Ebro India, Herba Ricemills and Mundi Riso
  - b. Wood chips, used by Ebrofrost
  - c. Wood charcoal, used by Ebro India
- \* Consumption of electricity, heat, steam and cooling from fossil sources
- \* Consumption of electricity, heat, steam and cooling from renewable sources
- \* Consumption of self-generated energy in photovoltaic facilities

## Energy consumption from fossil fuels

ENERGY CONSUMPTION AND MIX	2024	2023
(1) Fuel consumption from coal and coal products (MWh)	0	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	57,823	8,098
(3) Fuel consumption from natural gas (MWh)	819,688	762,029
(4) Fuel consumption from other fossil sources (MWh)	5,918	12,617
(5) Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	241,148	244,589
(6) Total energy consumption from fossil sources (MWh)	1,124,576	1,027,333
Percentage of fossil fuels in the total energy consumption (%)	95%	95%
(7) Consumption of nuclear energy (MWh)	0	0
Percentage of consumption of nuclear sources in the total energy consumption (%)	0%	0%
ENERGY CONSUMPTION FROM RENEWABLE SOURCES	2024	2023
(8) Fuel consumption from renewable sources including biomass (also comprising industrial and municipal waste of biologic origin, biofuels, biogas, hydrogen from renewable sources, etc.) (MWh)	23,111	27,551
(9) Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	22,495	23,872
(10) Consumption of self-generated non-fuel renewable energy (MWh)	7,539	5,417
(11) Total renewable energy consumption (MWh)	53,146	56,840
Percentage of renewable sources in the total energy consumption (%)	5%	5%
Total energy consumption (MWh)	1,177,722	1,084,173

**Note:** All leased offices (16) are excluded from the Group's energy consumption reporting because data are unavailable and negligible (less than 2%). The data from 2 owned offices are included (office of the Lustucru Premium Group in Lyon and the Transimpex office in Lambsheim).

This indicator has not been validated by an external body other than the verification provider for this Statement.

It has not been possible to calculate the percentage of nuclear energy as we do not have information on the proportion in the supply undertakings' mix.

Most (99%) of the data on energy consumption in own operations reported by the Group companies were obtained from invoices or direct measurement.

8.5% of the electricity consumed is from renewable sources, according to the contractual agreements reached with our suppliers, most of which (98%) are generator declarations (UK) and the remainder (2%) renewable energy certificates.

## Scope 2 (market) Contractual Instruments - MWh

TYPES OF CERTIFICATES	TOTAL (MWH)	% OF SCOPE 2
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	241,148	91.4%
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	22,495	8.5%
Renewable Energy Certificate (US, Canada, Australia)	436	1.9%
Generator Declarations (UK) for fuel mix disclosure	22,060	98.1%

In 2024, 3.4% of the total energy consumed by the Group was self-generated in its photovoltaic and cogeneration facilities.

ENERGY GENERATED FROM RENEWABLE SOURCES (MWH)	2024	%	2023	%
Self-generated electricity - Photovoltaic	7,551	0.6%	5,421	0.5%
ENERGY GENERATED FROM NON-RENEWABLE SOURCES (MWH)	2024	%	2023	%
Combustion (Cogeneration) - Self-generated electricity	32,801	2.8%	31,919	2.9%

Energy intensity

ENERGY INTENSITY PER NET REVENUE	2024	2023	% 2024 / 2023
Total energy consumption	1,177,722	1,084,173	9%
Net revenue (€ thousand)	3,140,493	3,084,457	2%
Energy intensity (MWh/€ thous net revenue)	0.38	0.35	7%

The total energy consumption from activities in high climate impact sectors corresponds to the total energy consumption indicated in the above table, because all the activity of the Ebro Group falls into class 10.61 - Manufacture of grain mill products, in Annex I Section C of Regulation (EC) No 1893/2006 of the European Parliament and of the Council (18) [as defined in Commission Delegated Regulation (EU) No 2022/1288 (19)].

In view of the Group’s activity and the make-up of its value chain, all its revenues are considered associated with high climate impact activities. The net turnover in 2024 was €3,140,493 thousand. See [Note 6](#) to the accompanying consolidated annual accounts.

E1-6. Gross Scope 1, 2, 3 and Total GHG emissions

\*(44,45,46,48,49,50,52a,52b,53,55)

The Scope 1, 2 and 3 emissions are calculated from the viewpoint of operational control.

For **Scopes 1 and 2** of the Group-level Carbon Footprint, a GHG Inventory procedure has been developed under ISO 14064-1:2019 for all the Group companies. The methodology used is calculation, using the activity data of each company/plant and emission factors obtained from official sources applicable to all the Group’s plants. All the gases are included in the calculation: CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFC, PFC, SF6 and NF3.

The sources of GHG emissions accounted for in Scopes 1 and 2 are:

DIRECT EMISSIONS

- \* Emissions of CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O from fossil fuel consumption by stationary sources
- \* Emissions of CO<sub>2</sub> from fossil fuel consumption by mobile sources (fleet of vehicles and machinery)
- \* Leaks of cooling gases (HFC) from HVAC equipment
- \* Emissions of CH<sub>4</sub> from the rice crop: emissions generated by the rice crop of Agromeruan in Morocco
- \* Emissions of N<sub>2</sub>O from elimination of nutrients in water treatment

INDIRECT EMISSIONS

- \* Emissions of CO<sub>2</sub> from energy consumption (electricity, heat, steam and cold) in installations and processes

EMISSIONS PRODUCED IN THE COMBUSTION OF BIOMASS

- \* Biogenic CO<sub>2</sub> emissions
- \* Direct emissions of CH<sub>4</sub> and N<sub>2</sub>O

The calculations were made considering:

- \* The activity data compiled by each company: fuel and electricity consumption
- \* The net calorific value of the fuels used (source: 2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1; IDAE)

- \* The global warming potentials from the IPCC Sixth Assessment Report
- \* Emission factors by type of fuel, from the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (vol.2, ch.1 and 2) and MITERD v.29
- \* In the case of electricity, the emission factors used were from several sources (MITECO, EEA 2023, US EPA, ADEME, DEFRA 2023)
- \* Emission factors of coolants from MITERD v.29 and DEFRA 2024

In 2023, with counselling from an external consultancy, the Group developed the procedure for calculating the **Scope 3** emissions on a Group level, following the calculation and reporting standards established by GHG Protocol. The categories included in the calculation are described below:

#### **CATEGORY 1. GOODS AND SERVICES. EXTRACTION, PRODUCTION AND TRANSPORTATION OF GOODS AND SERVICES PURCHASED OR ACQUIRED**

- \* **Methodology:** The methodology includes two approaches:
  - Average data method to calculate the environmental impact associated with the acquisition of raw materials (ingredients, packaging and water withdrawn).
  - Spend-based method to calculate the environmental impact associated with the acquisition of external services.
- \* **Emission factors used:**
  - To calculate the environmental impact of sourcing the Group's principal food raw materials (rice, wheat and quinoa) information was taken from the HowGood database, aligned with the FLAG standards for calculating carbon footprint, including an assessment by origin and processing level of the ingredient (rice and wheat). In the case of quinoa, the disaggregation level of the emission factor can reflect the sourcing differences in different countries, but not the differences in processing levels of the quinoa acquired.
  - To calculate the environmental impact of sourcing pulses and other ingredients, information was taken from the Agribalyse database.
  - Where sustainable raw materials have been purchased, as in the case of Tilda through Ebro India, we considered the emission reductions obtained through that sourcing, provided the reduction had been audited and validated by an external body (e.g. CoolFarmTool).
  - To assess the environmental impact corresponding to the purchase of packaging and water withdrawal, information was taken from the database of the Department for Energy Security and Net Zero, or DESNZ.
  - To assess the environmental impact corresponding to the acquisition of external services per spending unit, information was taken from the database of the U.S. Environmental Protection Agency (EPA).

#### **CATEGORY 2. CAPITAL GOODS. EXTRACTION, PRODUCTION AND TRANSPORTATION OF CAPITAL GOODS PURCHASED OR ACQUIRED**

- \* **Methodology:** The calculation used the spend-based method, based on the value of the capital goods acquired or purchased by each Group company, obtained from the monthly management accounts of the company in question.
- \* **Emission factors used:** The EPA database was used as the emission factor per spending unit.

#### **CATEGORY 3. FUEL- AND ENERGY-RELATED ACTIVITIES**

- \* **Methodology:** The calculation used the average data method, based on the energy consumption per type of fuel of each Group company, accounted for in Scopes 1 and 2. The calculation groups emissions into three main categories: upstream emissions from the purchase of fuels; upstream emissions from the purchase of electricity; and electricity transmission and distribution losses.



- \* **Emission factors used:** Information from the DESNZ databases (emissions associated with Well-To-Tank (WTT), Electricity generation and T&D (Transmission and Distribution) activities) was used for the environmental assessment of extraction, production and transportation of fuels and energy purchased.

#### CATEGORY 4. UPSTREAM TRANSPORTATION AND DISTRIBUTION

- \* **Methodology:** The calculation used the hybrid method, based on: (i) primary information from the logistics service providers, (ii) information on logistics operations provided by the companies in the Ebro Group and (iii) information on warehousing services expense provided by the companies.

The information obtained directly from service providers was provided by the company EccoFreight Transport Services SL (EccoFreight), the principal logistics operator rendering services to the Ebro Group. The information provided by EccoFreight corresponded to the emissions associated with all the operations in which that company acts as logistics service agent, classified by means of transport (truck, train or ship).

The emissions of companies for which there was insufficient information on their logistics activities were obtained by extrapolation based on total purchases.

- \* **Emission factors used:** Emission factors per means of transport were used, obtained from the DESNZ database. Emission factors from the EPA databases were used to calculate emissions associated with the warehousing services.

#### CATEGORY 5. WASTE GENERATED IN OPERATIONS

- \* **Methodology:** The waste-type-specific method was used, based on the waste generated in the Group's operations by type of waste. The calculation groups emissions according to the type of waste generated (e.g. cardboard, plastic, metal) and the type of end treatment (e.g. transport to landfill, incineration, recycling).
- \* **Emission factors used:** Information from the DESNZ database was used to calculate the emissions associated with the total waste generated by treatment and type of waste, except for wastewater treatment, for which an emission factor from IRSTEA (National Institute of Scientific and Technological Research for Agriculture and the Environment of France) was used.

#### CATEGORY 6. BUSINESS TRAVEL

- \* **Methodology:** The calculation used the hybrid method, using both primary information obtained directly from the travel providers and information assessed on the basis of travel information provided by the companies of the Ebro Group and external emission factors.

The calculation was made using primary information provided by the following companies of the Ebro Group: Riviana Foods, Herba Ricemills, Agromeruan, Arrozeiras Mundiarroz and La Loma Alimentos. The remaining companies were not considered, as obtaining information and assessing their impact on the total carbon footprint of the Group is not very cost-effective, so their carbon footprints were extrapolated from the information provided by companies that did have data on business travel.

The calculation contemplates business travel made, disaggregated by means of transport (plane, car, train) and hotel accommodation expenses.

- \* **Emission factors used:** Emission factors for business travel (disaggregated by means of transport) and accommodation from the DESNZ and EPA databases were used to calculate the emissions of the companies that did not have primary information from travel providers.

## CATEGORY 7. EMPLOYEE COMMUTING

- \* **Methodology:** The calculation used the average data method, based on the average employee commuting distance to the Group's plants and offices. The calculation was made for all the companies in the Ebro Group. Taking the total number of Group employees by company, information from the external database Numbeo was used to obtain the commuting trends by country (mode of transport used to travel to the workplace and average distance), taking into account the countries in which the Group's principal companies are domiciled (Italy, India, Belgium, Thailand, Spain, Argentina, France, Canada, United States, United Kingdom).
- \* **Emission factors used:** Emission factors for means of transport from the DESNZ databases were used to calculate the emissions associated with commuting to workplaces.

## CATEGORY 9. DOWNSTREAM TRANSPORTATION AND DISTRIBUTION

- \* **Methodology:** The calculation used the hybrid method, using both primary information obtained from the logistics providers and information on logistics operations provided by the companies of the Ebro Group. The information obtained directly from service providers was supplied by the company EccoFreight. For logistics operations handled by other operators, their carbon footprint was calculated based on the means of transport used (truck, train or ship). The emissions of companies for which there was insufficient information on their logistics activities were obtained by extrapolation based on total sales.
- \* **Emission factors used:** Emission factors for transport modes from the DESNZ databases were used to calculate the emissions associated with logistics operations.

## CATEGORY 10. PROCESSING OF SOLD PRODUCTS

- \* **Methodology:** The calculation used the average data method. The calculation was made for all the companies in the Ebro Group. The calculation methodology was established considering two aspects: the types of industrial products manufactured by the companies in the Ebro Group and the trading activity of our industrial customers.
- \* **Emission factors used:** The customer most representative of each category by sales volume was used to determine the emission factor for each customer category, assessing primary information of the company (Scope 1 and 2 footprint and costs incurred in the production of goods) to obtain an emission factor in terms of tonnes of CO<sub>2</sub> equivalent per spending unit. Subsequently, using the emission factors assessed for the five customer categories defined, the total emissions per category was estimated on the basis of the total sales of the Ebro Foods Group (in monetary terms).

## CATEGORY 11. USE OF SOLD PRODUCTS

- \* **Methodology:** The calculation was made on the indirect emissions (indirect use-phase emissions) using the average data method. The calculation was made for all the companies in the Ebro Group. Based on an analysis of the primary financial information, we identified the tonnes of end-products sold annually by each of the companies in the Ebro Group. The products were categorised according to the cooking method required. Primary data of cooking times, water and energy required, obtained from the life cycle assessments (LCA) on rice and pasta conducted by the Ebro Group were used to determine the indirect energy consumption for boiling. For emission factors, secondary information from the DESNZ database was used along with statistics from the European Union. It should be noted that the Ebro Group portfolio does not include any products that generate direct emissions in their use (direct use-phase emissions), such as those associated with a combustion engine, for example, so such emissions were not included in the calculation.

- ✦ **Emission factors used:** Secondary information from the DESNZ database was used along with statistics from the European Union. A detailed breakdown is included in Annex I.

## CATEGORY 12. END-OF-LIFE TREATMENT OF SOLD PRODUCTS

- ✦ **Methodology:** The calculation used the average data method. The calculation involved the waste generated in final disposal of product packaging and food waste. Primary information provided by the companies was used for packaging waste. Based on the hypothesis that all purchased packaging inputs would end up as waste at the end of their useful life, the final treatment rates (landfill, incineration and recycling) were applied to them according to the Life Cycle Assessment (LCA) made by Garofalo for its sold products and statistical reports of the European Union.

The methodology used for food waste was in line with that used for packaging waste, based on information provided by the companies regarding the total sold products and applying the final treatment rates (landfill, incineration, composting and methanation) indicated in the LCA and in statistical reports of the European Union.

- ✦ **Emission factors used:** The secondary emission factors used were taken from the DESNZ database.

## CATEGORY 15. INVESTMENTS

The emissions in this category come from the Ebro Group's investments in the rice producer Riso Scotti (a company outside the Ebro Group in which Ebro Foods, S.A. has a 40% interest).

- ✦ **Methodology:** The Investment-specific method and the Average data method were used. The calculation consisted of applying the interest held by the Ebro Group (40%) to the total carbon footprint (Scopes 1, 2 and 3) of Riso Scotti. The Scope 1 and 2 information was obtained from primary information shared by Riso Scotti for 2023 (the 2024 calculation is underway), while the Scope 3 information was estimated from the primary information of that company regarding all products sold by the company and secondary information from the Agribalyse database.

The following categories are excluded from the calculation of Scope 3 emissions:

- ✦ **Category 8.** Upstream leased assets, accounted for in Scopes 1 and 2.
- ✦ **Category 13.** Downstream leased assets, as the Ebro Group does not have any assets leased to other entities.
- ✦ **Category 14.** Franchises, as the Ebro Group has no franchises within its business model.

CATEGORIES OF GROSS GHG EMISSIONS (SCOPES 1, 2 AND 3)	RETROSPECTIVE			
	2024	2023	VARIACIÓN	% 2024 / 2023
<b>SCOPE 1 GHG EMISSIONS</b>				
Gross scope 1 GHG emissions (tCO <sub>2</sub> eq)	192,836	168,777	24,059	14%
Percentage of Scope 1 GHG emissions from regulated emission trading systems (%)	0	0	0	0%
<b>SCOPE 2 GHG EMISSIONS</b>				
Gross location-based scope 2 GHG emissions (tCO <sub>2</sub> eq)	78,363	87,095	(8,732)	(0%)
Gross market-based scope 2 GHG emissions (tCO <sub>2</sub> eq 2eq)	76,792	84,715	(7,923)	(9%)
<b>SIGNIFICANT SCOPE 3 GHG EMISSIONS</b>				
Gross total indirect GHG emissions (Scope 3) (tCO <sub>2</sub> eq)	5,971,811	5,476,685	495,126	9%
1 Purchased goods and services	4,378,473	4,326,353	52,120	1%
2 Capital goods	140,988	27,209	113,779	418%
3 Fuel- and energy- related activities (not included in scope 1 or scope 2)	45,326	40,973	4,353	11%
4 Upstream transportation and distribution				
5 Waste generated in operations	392,367	306,489	85,878	28%
6 Business travel	4,156	6,135	(1,979)	(32%)
7 Employee commuting	755	544	211	39%
9 Downstream transportation	4,278	4,581	(303)	(7%)
10 Processing of sold products	520,388	184,142	336,246	183%
11 Use of sold products	40,314	49,103	(8,789)	(18%)
12 End-of-life treatment of sold products	256,618	361,138	(104,520)	(29%)
15 Investments	15,916	16,224	(308)	(2%)
	172,232	153,794	18,438	12%
<b>TOTAL GHG EMISSIONS</b>				
Total GHG emissions (location-based (tCO <sub>2</sub> eq)	6,243,011	5,732,556	510,455	9%
Total GHG emissions (market-based) (tCO <sub>2</sub> eq)	6,241,439	5,730,176	511,263	9%

**Note:** The comparison is made with the previous year reported (2023), even though it is not the base year, as we have not yet defined a decarbonisation plan.

**Note:** All leased offices (16) are excluded from the Group's energy consumption reporting because data are unavailable and negligible (less than 2%). The data from 2 owned offices are included (office of the Lustucru Premium Group in Lyon and the Transimpex office in Lambsheim).

The percentage of Scope 3 emissions calculated from the primary data is 8.9%. This indicator has not been validated by an external body other than the verification provider for this Statement.

The regulated emission trading system is not applicable to the Ebro Group.

We set out below the breakdown of emissions by country. Note that the sum of emissions by country or company does not coincide with the Group-level total emissions as there are intercompany movements (trading between two Group companies), where emissions included in the company-level carbon footprint calculation are not in the Group-level consolidated calculation because, since external purchases are already taken into account to calculate the Group's carbon footprint, if intercompany transactions were also considered, this would result in double-counting of emissions.

## Breakdown of GHG Emissions by Country

COUNTRY	SCOPE 1	SCOPE 2 (LOCATION)	SCOPE 2 (MARKET)	SCOPE 3	TOTAL (LOCATION)	TOTAL (MARKET)
Argentina	2,873	1,488	5	28,547	32,209	31,426
Belgium	547	2,293	1,934	459,745	462,585	462,227
Cambodia	11	194	127	90,361	90,565	90,499
Canada	4,575	1,729	1,729	62,613	68,917	68,917
Denmark	1,185	1,389	5,588	106,572	109,145	113,344
France	7,116	1,651	3,439	248,144	256,911	258,699
Germany	4,735	633	510	44,741	50,109	49,986
Hungary	0	2	3	26,961	26,962	26,963
India	581	6,723	6,723	404,876	412,181	412,181
Italy	32,801	6,956	8,502	429,752	469,508	471,054
Morocco	9,984	2,433	2,433	22,124	34,540	34,540
Netherlands	2,944	4,425	5,033	20,412	27,782	28,389
Portugal	436	859	691	192,904	194,198	194,030
Spain	13,177	8,037	5,008	1,207,399	1,228,613	1,225,583
Thailand	106	1,416	1,461	1,096,775	1,098,297	1,098,341
United Arab Emirates	0	0	0	17,095	17,095	17,095
United Kingdom	17,224	4,761	232	626,458	648,443	643,915
United States	94,543	33,374	33,374	2,075,625	2,203,542	2,203,542
<b>TOTAL</b>	<b>192,836</b>	<b>78,363</b>	<b>76,792</b>	<b>7,161,104</b>	<b>7,432,303</b>	<b>7,430,732</b>

The Scope 1 biogenic emissions come from the combustion of renewable organic material, such as wood chips, rice husk and wood charcoal.

SCOPE 1 BIOGENIC CO <sub>2</sub> EMISSIONS	
Total Biogenic CO <sub>2</sub> Emissions (tCO <sub>2</sub> )	8,904



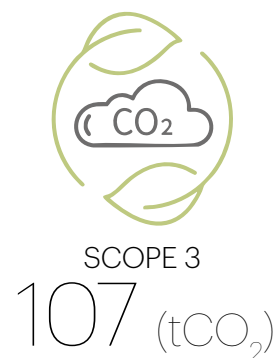
8.5% of the purchased electricity is generated from renewable sources. We set out below the breakdown of contractual instruments used:

SCOPE 2 (MARKET) CONTRACTUAL INSTRUMENTS - MWH	TOTAL (MWH)	% OF SCOPE 2
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	241,148	91.4%
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	22,495	8.5%
Renewable Energy Certificate (US, Canada, Australia)	436	1.9%
Generator Declarations (UK) for fuel mix disclosure	22,060	98.1%
Guarantees of Origin (EU)	0	0.0%
Electricity contracts (PPA) that also convey RECs or GOs	0	0.0%

**Note:** This requirement is calculated with the MWh data instead of emissions data, because the Group has zero emissions of electricity with guarantee of renewable origin.

We do not have data to calculate Scope 2 biogenic emissions.

SCOPE 3 BIOGENIC EMISSIONS	
Rice husk	0
Wood chips	107
Total (tCO <sub>2</sub> )	107



CO <sub>2</sub> EMISSIONS INTENSITY - LOCATION-BASED	2024	2023	% 2024 / 2023
Total GHG missions (location-based) per net revenue (tCO <sub>2</sub> eq/monetary unit)	6,243,011	5,732,556	9%
Net revenues (€ thousand)	3,140,493	3,084,457	0
Total GHG Emissions Intensity (location-based) (tCO <sub>2</sub> eq/€ thousand)	1.99	1.86	7%
CO <sub>2</sub> EMISSIONS INTENSITY - MARKET-BASED	2024	2023	% 2024 / 2023
Total GHG missions (market-based) per net revenue (tCO <sub>2</sub> eq/monetary unit)	6,241,439	5,730,176	9%
Net revenues (€ thousand)	3,140,493	3,084,457	2%
Total GHG Emissions Intensity (market-based) (tCO <sub>2</sub> eq/€ thousand)	1.99	1.86	7%

The net turnover in 2024 was €3,140,493 thousand. See [Note 6](#) to the accompanying consolidated annual accounts. The total net turnover has been considered to measure the intensity of the greenhouse gases.

## E1-7. GHG removals and GHG mitigation projects financed through carbon credits

The Ebro Group has not developed any projects in own operations or along its value chain to eliminate and store GHG financed through the purchase of carbon credits.

## E1-8. Internal carbon pricing

The Group has no internal carbon pricing system.

## ESRS E2 POLLUTION

### List of IROs associated with E2

#### Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH IRO
<b>POLLUTION</b>					
IP-08	Reduction of impacts by pollution with substances of concern or substances of very high concern in the sourcing areas, by means of quality controls and detection of fungicides and pesticides, selection of suppliers with sustainability policies and provision of free biocontrol products to guarantee a rational use of pesticides.	I+	A	Ups OO	Sustainability, Environmental and Corporate Social Responsibility Policy  Code of Conduct  Supplier Code of Conduct
IN-06	Pollution of effluent through own operations of pasta and rice production.	I-	P	OO	Short term Sustainability, Environmental and Corporate Social Responsibility Policy
IN-08	Increase in soil acidity and impairment of microfauna as a result of the use of (inorganic or organic) fertilizers and pesticides on the crops in the Group's sourcing areas.	I-	P	Ups	Short term

#### KEY: Impact

I+: Positive Impact   I-: Negative Impact   O: Opportunity   R: Risk   P: Potential   A: Actual

#### KEY: Value Chain (VC)

Ups: Upstream   OO: Own Operations   Down: Downstream

### IRO-1 Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

\*(11)

The process to identify IROs is described in ESRS 2 SBM-3 and IRO-1. In particular, for pollution-related IROs we considered policies regarding suppliers, the legal framework (especially that established by the European Union), environmental controls in facilities, actions taken by the Group in this area and the general targets of the Long-Term Sustainability PLAN HEADING FOR 2030.

The analysis took account of stakeholders, particularly those related with our supply chain, with whom the Group has constant relationships although no specific consultations have been made.

No material risks and opportunities were identified in connection with this topic. The IROs identified as material in the Double Materiality Assessment were:

- \* Positive impacts deriving from the reduction of impacts by pollution with substances of concern or substances of very high concern in the sourcing areas.
- \* Possible negative impacts due to water pollution deriving from the Group's activities (at its production plants listed in [Annex 5.6](#) to this Statement) and soil pollution caused by the use of fertilizers or pesticides along the value chain (by third parties).

The Group addresses both impacts in several ways:

- \* Adaptation to and compliance with environmental laws and regulations by all plants, especially those that are extremely protective of consumers and end-users of food products, so our food quality and security requirements impose rigorous conditions on our suppliers.
- \* Selection and support for suppliers with sustainability policies and application of the Supplier Code of Conduct.
- \* Awareness campaigns among growers to ensure a rational use of pesticides and search for natural alternatives (resistant seeds or alternative agricultural uses).
- \* Aspects such as water treatment and increase in the volume of recycled water used.
- \* Quality controls and detection of fungicides and pesticides. EC laws.

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## E2-1. Policies related to pollution

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\*(14,15a,15c)

The Ebro Group addresses sustainability across its food chain through policies that promote responsible agricultural practices, such as regenerative agriculture and working with suppliers in our value chain.

These practices include a focus on the sustainable management of plant protection products, promoting a rational, responsible use of these products to minimise environmental impact. We thus help to reduce the use of substances of concern and progress towards more sustainable alternatives.

Although the Ebro Group does not produce or sell substances of very high concern, our commitment to sustainability fosters adopting practices that favour soil regeneration and protection of the agricultural ecosystems within our value chain. An example of these actions can be found in section E2-2. The policy guides the company's processes, activities and decisions, to protect the environment and prevent and minimise environmental impacts.



## SUSTAINABILITY, ENVIRONMENTAL AND CORPORATE SOCIAL RESPONSIBILITY POLICY

MDR-P 65(a) E2-1; 15	<b>Contents:</b> Through this Policy, the Group makes sustainable growth the pillar of its business management strategy, undertaking commitments to its principal stakeholders, namely its professionals, shareholders, communities, public and environment.  The environment-related principles, commitments, targets and strategy, particularly those related with climate change, establish the undertaking to guide the organisation's processes, activities and decisions to protect the environment and prevent and minimise our environmental impacts.  Monitoring and oversight fall within the remit of the Audit, Control and Sustainability Committee, which reports to the Board of Directors.
	<b>Scope:</b> Ebro Group
MDR-P 65(c)	<b>Most senior level accountable for implementation:</b> The Board of Directors is the body responsible for its approval.
MDR-P 65(d)	<b>Disclosure of third-party standards or initiatives to which Group commits</b> <ul style="list-style-type: none"> <li>• Section 529 ter Corporate Enterprises Act (LSC)</li> <li>• Principle 24 of the Code of Good Governance of the National Securities Market Commission (CNMV)</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<b>Availability:</b> The Policy is available on the Group's corporate website ( <a href="#">Politica-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a> ).

## CODE OF CONDUCT OF THE EBRO FOODS GROUP

MDR-P 65(a) E2-1; 15	<b>Contents:</b> Sets out the principles and values that should inspire the actions of the companies and persons in the Ebro Foods Group and the rules binding on the Professionals in the performance of their duties to meet its targets. In environmental matters, it expresses a firm commitment to implement adequate, reasonable tools to minimise the impact of its operations on the environment and reduce the generation of emissions.  The environment-related principles, commitments, targets and strategy include the commitment to guide the organisation's processes, activities and decisions to protect the environment and prevent and minimise our environmental impacts.  Monitoring and control of its application falls within the remit of the Audit, Control and Sustainability Committee. This committee regularly informs the Board of Directors on its interpretation, application, compliance, incidents or breaches and their remediation.
	<b>Scope:</b> Ebro Group
MDR-P 65(c)	<b>Most senior level accountable for implementation:</b> The Board of Directors is the body responsible for its approval.
MDR-P 65(d)	<b>Disclosure of third-party standards or initiatives to which Group commits</b> <ul style="list-style-type: none"> <li>• United Nations Universal Declaration of Human Rights</li> <li>• Principles of the International Labour Organization (ILO)</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<b>Availability:</b> The Code is available on the Group's corporate website ( <a href="#">Código-de-Conducta</a> ).

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**SUPPLIER CODE OF CONDUCT OF THE EBRO FOODS GROUP**


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<b>MDR-P 65 a)</b>	<b>Contents:</b> The Supplier Code of Conduct of the Ebro Group sets out the basic principles and values that should underlie all relations between the companies and professionals of the Ebro Foods Group and their suppliers and service providers. It thus establishes the obligation for its suppliers to comply with the applicable laws and standards. Monitoring and oversight fall within the remit of the Audit, Control and Sustainability Committee, which reports to the Board of Directors.
<b>E2-1; 15</b>	
<b>MDR-P 65 b)</b>	<b>Scope:</b> Ebro Group
<b>MDR-P 65 c)</b>	<b>Most senior level accountable for implementation:</b> The Board of Directors is the body responsible for its approval.
<b>MDR-P 65 d)</b>	<b>Disclosure of third-party standards or initiatives to which Group commits</b> <ul style="list-style-type: none"> <li>• United Nations Universal Declaration of Human Rights</li> <li>• Principles of the International Labour Organization (ILO)</li> <li>• The Ten Guiding Principles of the United Nations</li> </ul>
<b>MDR-P 65 e)</b>	N/A
<b>MDR-P 65 f)</b>	<b>Availability:</b> The Code is available on the Group's corporate website ( <a href="#">Código-de-Proveedores.pdf</a> ).

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It should be noted that none of the Policies and Codes mentioned above explicitly address the following topics:

- ✱ Mitigation of adverse incidents related with pollution of the air, water and soil, or their prevention and control
- ✱ Minimisation and substitution of substances of concern and phasing-out of substances of very high concern
- ✱ Prevention of incidents and emergency situations

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## E2-2. Actions and resources related to pollution

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\*(18)

All the Group's facilities comply with the laws and environmental requirements regarding effluent limits. All effluent is discharged into sewer networks, except in the companies Bertagni, Ebro India, Ebro Frost Germany, La Loma Alimentos and Agromeruan, which discharge into inland waters.

No specific pollution-related actions were taken in 2024 in own operations.

In our value chain, several actions were taken during 2024 in the Group's main sourcing areas (see E1-3). Those actions were designed to promote (among other goals) a rational, efficient use of chemicals (pesticides, fertilizers) and biological pest control, thus achieving less soil pollution and making it possible to keep within the maximum waste limits required by law. In other cases, the actions were related with crops with organic certification.

In the project developed by Ebro India, through training and counselling on best practice, the use of pesticides was reduced by 70% and the use of fertilizers by 25% (per kg of rice).

All our sustainable agriculture projects are intended to be continuous and will continue in the short term.

### MDR-A: Water purification

ACTION	SCOPE*	COMPANY	TIME HORIZON	CAPEX (€ THOUS)
New water treatment plant at Saint Genis Laval	OO	Lustucru Premium Group	Long term	568
TOTAL				568

**KEY: Scope\***

Ups: Upstream   OO: Own Operations   Down: Downstream

With regard to water treatment, our subsidiary Lustucru Premium Group invested a sum of €568 thousand in the complete renovation of the water treatment plant at its St Genis Laval fresh pasta plant.

The investment indicated in the above table is part of the total investments made by the Group, disclosed in **Note 9** to the accompanying consolidated annual accounts. The investment made at the St-Genis-Laval plant (Lustucru Premium Group) is expected to be completed during 2025 with an additional investment of approximately €0.2 million. There are no further plans approved in relation to this topic.

Actions were also taken in 2024 in respect of water treatment at the Group's plants, with an expenditure of €414 thousand. These expenses are recurrent and are included in the item Other operating expenses (**Note 7**) in the income statement of the accompanying consolidated annual accounts.

### E2-3. Targets related to pollution

\*(81)

No targets have been set related to pollution or in own operations (water pollution by effluent) or in the value chain (soil pollution and the use of substances of concern and substances of very high concern) beyond compliance with the law, owing to the complexities of the Group's value chain. The viability of establishing short or medium-term targets will be analysed internally.

All the projects and actions developed in the value chain, such as those described in E1-3, have field supervision and monitoring, as well as external audits for organic and SRP verifications.

E2-4. Pollution of air, water and soil

\*(28a,30a,b,c,31)

Owing to the complexity of the Group’s value chain, it was not possible to obtain field data on soil pollution and the use of substances of concern and substances of very high concern.

We only have data on the quality of effluent at some of the facilities in relation to the requirements for environmental permissions obtained, in particular:

- \* **Herba Ricemills:** San Juan de Aznalfarache and La Rinconada.
- \* **Pastificio Lucio Garofalo:** Gragnano.

The figures correspond to direct measurements at 3 facilities. The measurements taken by Herba Ricemills were externally verified by AGQ Labs, an accredited laboratory.

Wastewater (effluent) pollution

TYPE OF POLLUTANT	EMISSION TO WATER (TONNES/YEAR)
Total phosphorus	5
Total nitrogen	2
Total organic carbon (TOC)	60
Fluorides	0
Total chlorides	46

As a short and medium-term target, we will work to extend the Group’s reporting scope in this area.



## ESRS E3

# WATER AND MARINE RESOURCES

### List of IROs associated with E3

#### Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH IRO
<b>MANAGEMENT OF WATER RESOURCES</b>					
IN-12	Increase in water stress due to water withdrawal in areas of water stress, both in crop-growing areas and at production plants	I-	A	Ups OO	Sustainability, Environmental and Corporate Social Responsibility Policy
O-08	Opportunities to access public/private financing through the implementation of projects, strategies or measures to improve water quality and management (e.g. European funds).	O	P	Ups OO	Short term
R-08	Dependence on water resources, especially in sourcing areas and in regions with drought risks, producing operating costs and low production yields.	R	A	Ups OO Down	Short term

#### KEY: Impact

I+: Positive Impact I-: Negative Impact O: Opportunity R: Risk P: Potential A: Actual

#### KEY: Value Chain (VC)

Ups: Upstream OO: Own Operations Down: Downstream

Water consumption in the Ebro Group derives from the processes of its activities, namely:

- ✱ Its pasta production and pre-cooked food processes and the production of dry rice. The latter is much less intensive and has minimal consumption.
- ✱ Consumption of water used by the subsidiary Agromeruan (Morocco) for farming the agricultural land it leases. It has 1,641 ha, of which only 900 ha are used for rice-growing. This is the only agricultural process performed by the Group.

### IRO-1. Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

\*(8)

The process to identify IROs is described in ESRS 2 SBM-3 and IRO-1. In particular, we took into account sectoral studies, historical information on areas sown in areas at risk of salinity or water shortages for farming, and the targets set in the Long-Term Sustainability PLAN HEADING FOR 2030 for reduction of water consumption and recycling of water at the Group's plants.

The analysis considered both stakeholders (with which the Group has constant contact) and local administration, although no specific consultations were submitted to the latter.

The IROs identified as material in the Double Materiality Assessment were:

- \* Negative impact deriving from a possible increase in water stress caused by the withdrawal of water for crop-growing or production processes in areas exposed to this kind of risk.
- \* Opportunities to access public/private funding through the implementation of projects, strategies or actions that improve water quality and management.
- \* Risk of a possible dependence on water resources, especially in the sourcing areas, as some studies prove that the rice crop requires a significant quantity of water, particularly in certain crop-growing areas with major temperature fluctuations where the sheet of water produces a thermoregulation effect.

Aspects related with the use of water for irrigation and salinity in certain crop-growing areas due to insufficient water resources were also considered material as they can have a material impact on the productivity of Group plants, such as those situated in the Guadalquivir valley.

### E3-1. Policies related to water and marine resources

\*(11,12,13)

SUSTAINABILITY, ENVIRONMENTAL AND CORPORATE SOCIAL RESPONSIBILITY POLICY	
MDR-P 65(a) E3-1; 12 E3-1; 13	<p><b>Contents:</b></p> <p>Through this Policy, the Group makes sustainable growth the pillar of its business management strategy, undertaking commitments to its principal stakeholders, namely its professionals, shareholders, communities, public and environment.</p> <p>The environment-related principles, commitments, targets and strategy establish the undertaking to guide the organisation's processes, activities and decisions to protect the environment and prevent and minimise our environmental impacts.</p> <p>Oversight and monitoring fall within the remit of the Audit, Control and Sustainability Committee, which reports to the Board of Directors.</p>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>Ebro Group</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b></p> <p>The Board of Directors is the body responsible for its approval.</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Section 529 ter Corporate Enterprises Act (LSC)</li> <li>• Principle 24 of the Code of Good Governance of the National Securities Market Commission (CNMV)</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b></p> <p>The Policy is available on the Group's corporate website (<a href="#">Politica-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a>).</p>

However, this Policy does not directly address the relatively important IROs related with water resources, or the most important issues related with water management, design of products or services or undertakings to reduce water consumption. Nor does it disclose whether there are any sites located in an area of high water stress.

### E3-2. Actions and resources related to water and marine resources

\*(17,19)

In 2024 the company Bertagni 1882 took the following action related to water resources in own operations. Bertagni 1882 operates in Italy, in an area of high water stress. They were measures designed to reduce water consumption at this plant.

#### MDR-A: Optimising water consumption

ACTION	SCOPE*	SUPERVISION	TIME HORIZON	CAPEX (€ THOUS)
Optimising of water consumption and improvement of water management at Vicenza (Arcugnano)	OO	Bertagni 1882	Short term	59
TOTAL				59

**KEY: Scope\***

Ups: Upstream OO: Own Operations Down: Downstream

In addition, some sustainable agriculture projects are related to efficient water management by growers (See E1-3).

The investment indicated in the above table is part of the total investments made by the Group, disclosed in **Note 9** to the accompanying consolidated annual accounts.

There are no other plans approved in relation to this area.

### E3-3. Targets related to water and marine resources

\*(22)

At present the Ebro Group has no targets related to water and marine resources.

#### TRACKING THE EFFECTIVENESS OF POLICIES AND ACTIONS

The Group acknowledges the importance of efficient water management as a key factor for the sustainability of its business and the resilience of its supply chain, especially in the rice crop, a product highly dependent on water resources.

- ✱ Tracking processes: At present, the risks and opportunities related to the use of water are monitored by the subsidiaries and operating units of the Group (i.e. not centralised), with initiatives designed to optimise water consumption in industrial processes and in the field. In some crop-growing areas, growers are exploring more efficient irrigation techniques and water handling strategies to minimise water stress and mitigate soil salinity. However, the absence of a global water management strategy makes it difficult to apply unified measurement criteria and make an aggregate analysis of Group-level results.
- ✱ Level of ambition and indicators used: Since the Group does not yet have a global action plan in this area, it has not defined the specific level of ambition with quantifiable targets and homogeneous measurement indicators. However, key opportunities have been identified, such as access to public-private funding for the implementation of projects to improve water management and water quality, which could help to boost the development of a more structured strategy in the future and define specific indicators to measure progress in this area in forthcoming years.

## E3-4. Water consumption

\*(28,29)

### Water consumption data for own operations

VOLUMEN (M³)	2024	2023
(a) Total water consumption	4,313,659	3,163,162
(b) Consumption in areas at water risk (high water stress)	3,530,468	935,546
(c) Total water recycled and reused	2,742	4,383
(d) Total water stored	4,345	0
Total changes in storage	0	0

**Note:** All leased offices (16) are excluded from the Group's energy consumption reporting because data are unavailable and negligible (less than 1%). The data from 2 owned offices are included (office of the Lustucru Premium Group in Lyon and the Transimpex office in Lambsheim).

To calculate indicator (b) consumption in areas at water risk, we took the areas of high and extremely high risk from the Baseline Water Stress (the Aqueduct Water Risk Atlas tool of the World Resources Institute (WRI)).

This indicator has not been validated by an external body other than the verification provider for this Statement.

Water consumption in the Ebro Group includes water consumption in offices and in the manufacturing processes. In this regard, apart from pasta production and pre-cooked food processes, which are rather more water-intensive, our other processes, such as the production of dry rice, have minimal water consumption.

This indicator also includes the consumption of water by Agromeruan for farming its leased agricultural land. This is the only agricultural process performed by the Ebro Group.

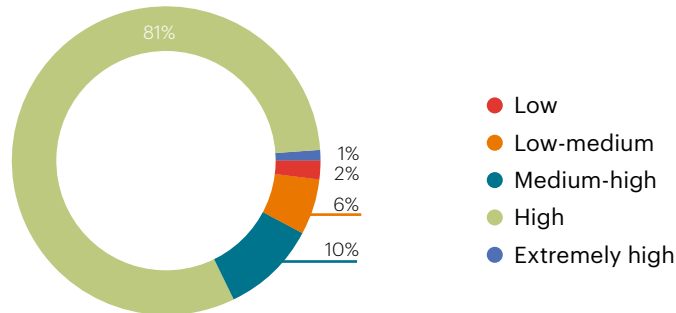
It should also be noted that most of the water used by the Group for its industrial processes is obtained from municipal water supply networks and a small proportion is from wells.

14% of the figures on water consumption were obtained from invoices or direct measurement, the remaining 86% being estimated. This is due to the volume of water used by Agromeruan for farming the agricultural land.

WATER INTENSITY	
Water consumption (m³)	4,313,659
Net revenues (€million)	3,140
Water intensity (m³/€million)	1,374



WATER CONSUMPTION IN AREAS AT RISK (M³)	2024	
Low	69,584	2%
Low-medium	263,351	6%
Medium-high	450,256	10%
High	3,494,899	81%
Extremely high	35,569	1%



The classification of water risk areas is based on the Baseline Water Stress (the Aqueduct Water Risk Atlas tool of the World Resources Institute (WRI)).

Only the Taraori plant owned by Ebro India reports reused water. During 2024, the volume was 2,742 m³/year. In 2023, for the same plant, recycled water totalled 4,383 m³/year.

With regard to the water storage indicator, it was not possible to obtain information from all the Group companies. The (i) Bruno and Villanova Monferrato plants owned by the Italian subsidiary Geovita Functional Ingredients, (ii) San Juan de Aznalfarache, Jerez de la Frontera, Silla, Algemesí and Los Palacios of the Spanish subsidiary Herba Ricemills and (iii) Freeport plant owned by the US subsidiary Riviana Foods, all have water storage.

This indicator was not available in 2023, so the Group has no indicators of changes in water storage.

## ESRS E4

# BIODIVERSITY AND ECOSYSTEMS

### List of IROs associated with E4

#### Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT		VC	TIME HORIZON	POLICIES ASSOCIATED WITH IRO
BIODIVERSITY						
IP-17	Creation of agricultural habitats with high ecological value (wetlands, habitats of protected species, etc.)	I+	P	Ups	Medium term	Sustainability, Environmental and Corporate Social Responsibility Policy
IN-19	Land degradation and loss of soil properties as a result of intensive farming practices in the suppliers' sourcing areas.	I-	P	Ups	Short term	Supplier Code of Conduct
R-12	Operating costs as a result of reduced agricultural production due to the loss of soil properties or high temperatures that diminish crop yield.	R	A	Ups OO Down	Short term	

#### KEY: Impact

I+: Positive Impact I-: Negative Impact O: Opportunity R: Risk P: Potential A: Actual

#### KEY: Value Chain (VC)

Ups: Upstream OO: Own Operations Down: Downstream

### SBM-3. Material impacts, risks and opportunities and their interaction with strategy and business model

\*(16b,16c)

The material IROs related to biodiversity are associated with aspects of the value chain, especially operations involving the raw materials used in that chain and its business model.

The creation of agricultural habitats with high ecological value (wetlands, habitats of threatened species, etc.) is considered a positive impact. How rice and cereals are grown has a direct influence on whether a habitat is favourable for many species, in some cases protected species like the bustard.

It is estimated that rice crops account for up to 15% of the global area of wetlands, with a high ornithological value (source: International Rice Research Institute). Moreover, the rice crop is essential for numerous communities with a high dependence on the crop, and its growing production (FAO) is essential to feed a large percentage of the population at risk of poverty. The Group considers it strategic to collaborate with local communities to

protect that population and their territory and thus protect its value chain and differentiate and guarantee its raw materials.

At the same time, land degradation and the loss of soil properties as a result of intensive agricultural practices in the sourcing areas was identified as a possible adverse impact. As described in section ESRS 2 SBM 1, the Group does not produce the raw material it processes and sells, but our relationships with suppliers are covered in our Sustainability, Environment and Corporate Social Responsibility Policy and Supplier Code of Conduct (see E4-2). While seeking excellence in its products and security in its supply chain, the Group actively supports sustainable agriculture programmes to regenerate crop lands and boost their productivity.

The risk was detected of a possible increase in operating costs as a result of diminishing agricultural production due to the loss of soil properties or high temperatures, which reduce crop yield.

This risk is related with the possible positive and negative impacts mentioned in the preceding paragraphs and their inclusion in our strategy and remediation actions.

We did not identify any threatened species linked to the operations of the Ebro Group.

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## IRO-1. Description of processes to identify and assess material biodiversity-related impacts, risks and opportunities

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\*(17a-d,19)

The process for identifying the IROs is described in ESRS 2 SBM 3 and IRO 1. In particular, we considered: (i) the physical locations of the Group's plants and facilities and its sourcing areas, paying special attention to those that are near protected areas -the Riviana plant in Freeport (Texas, USA), which is near a protected area of wetland of the Brazos River; and Tilda's pier on the River Thames (UK)-, (ii) sectoral studies on the environmental impact of rice and wheat crops, (iii) studies on the possible impact that their production could have on temperature rises or the shortage of water resources, (iv) sectoral studies on the possible impact of these crops on the appearance of pests and/or diseases that affect biodiversity as a result of the accumulation of biomass, and (v) analysis of community dependencies on this type of crops.

The assessment considered the stakeholders and local communities with whom the Group has continuous contact through agricultural support programmes and the design and building of infrastructures, although no specific consultations were made.

Three IROs were identified as material in the Double Materiality Assessment through the assessment of information on this topic: one positive impact, one negative impact and one risk. They are all essentially related with the Group's value chain. These IROs are described in this ESRS E4 SBM-3 together with their interaction with the Group's strategy.

In the qualitative assessment, we considered the possible dependencies of the IROs considered, such as the possible risk of an increase in operating costs deriving from the negative impact of a possible reduction of biodiversity resulting from the Group's operations or value chain.

When assessing the IROs we considered possible physical risks (location of facilities and production areas) and transition risks (greater regulatory requirements regarding those physical risks), but we did not assess different scenarios such as those defined by the Taskforce on Nature-related Financial Disclosures, nor were they quantified.

In the Double Materiality Assessment no Group facilities were identified as having a material adverse impact on a biodiversity-sensitive area.

E4-1. Transition plan and consideration of biodiversity and ecosystems in strategy and business model

\*(13a)

No assessment was made of the resilience of the Group’s strategy and business model to biodiversity and ecosystems-related physical, transition and systemic risks, nor has it yet been determined whether such assessment will be made in the future.

E4-2. Policies related to biodiversity and ecosystems

\*(22,23,24a,b,65)

SUSTAINABILITY, ENVIRONMENTAL AND CORPORATE SOCIAL RESPONSIBILITY POLICY	
MDR-P 65(a)	<p><b>Contents:</b></p> <p>Through this Policy, the Group makes sustainable growth the pillar of its business management strategy, undertaking commitments to its principal stakeholders, namely its professionals, shareholders, communities, public and environment.</p> <p>The environment-related principles, commitments, targets and strategy, especially those related to biodiversity, establish the undertaking to protect biodiversity.</p> <p>Oversight and monitoring fall within the remit of the Audit, Control and Sustainability Committee, which reports to the Board of Directors.</p>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>Ebro Group</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b></p> <p>The Board of Directors is the body responsible for its approval</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"><li>• Section 529 ter Corporate Enterprises Act (LSC)</li><li>• Principle 24 of the Code of Good Governance of the National Securities Market Commission (CNMV)</li></ul>
MDR-P 65(e)	<p>N/A</p>
MDR-P 65(f)	<p><b>Availability:</b></p> <p>The Policy is available on the Group’s corporate website (<a href="#">Politica-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a>).</p>

This Policy does not directly address any of the following points related with biodiversity:

- ✱ Contribution to direct impact drivers on biodiversity loss (climate change, land-use change, direct exploitation, invasive alien species, pollution, etc.)
- ✱ Impacts and dependencies on ecosystem services
- ✱ Traceability of products, components and raw materials with impacts on biodiversity

- \* Production, sourcing or consumption from ecosystems that are managed to maintain or enhance conditions for biodiversity
- \* Social consequences of biodiversity and ecosystems-related impacts
- \* Operational sites of the Ebro Group located near protected areas, as they were not identified as material in the Double Materiality Assessment.

However, as mentioned in point E1-3, the Group has projects to promote sustainable agriculture as a best practice not contemplated in the Sustainability, Maintenance and Corporate Social Responsibility Policy.

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### E4-3. Actions and resources related to biodiversity and ecosystems

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\*(27)

As indicated in SBM-3, the creation of agricultural habitats with high ecological value (wetlands, habitats of threatened species, etc.) is considered a positive impact. How rice and cereals are grown has a direct influence on whether a habitat is favourable for many species, in some cases protected species.

In the AWD project developed by Ebro India (see E1-3), growers were given training and counselling on the benefits of integrated pest management, an approach that moves away from a system based mainly on pesticides to use more alternative pest control solutions that favour biodiversity. The growers were supplied with free pheromone traps to attract insects. Trapping of these insects gives growers visibility of the level of infestation in the fields, enabling them to apply plant health products more precisely and in smaller quantities. They were also given straw bales to create a habitat for spiders, which act as a natural form of biological pest control.

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### E4-4. Targets related to biodiversity

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\*(31)

The Ebro Group has not established targets related to biodiversity.

#### TRACKING THE EFFECTIVENESS OF POLICIES AND ACTIONS

The Group does not have a structured, homogeneous, Group-level process to track the effectiveness of its biodiversity-related actions. Nor has a specific level of ambition been established, or a reference period to measure progress in this area. However, some of our subsidiaries have developed specific initiatives that may have a positive impact on biodiversity, such as sustainable agriculture projects or the AWD project in India, which promotes integrated plague management reducing the use of pesticides. In the future, the Group might consider developing a more systematic approach in this matter, analysing its impact on ecosystems in greater depth and establishing metrics to enable assessment of its contribution.

## ESRS E5

# RESOURCE USE AND CIRCULAR ECONOMY

### List of IROs associated with E5

#### Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT		VC	TIME HORIZON	POLICIES ASSOCIATED WITH IRO
CIRCULAR ECONOMY						
IP-21	Waste reduction and recovery through actions developed to increase recovery (e.g. use of by-products such as rice husk, wood chips and wood charcoal) and recycling.	I+	P	OO Down	Medium term	Sustainability, Environmental and Corporate Social Responsibility Policy
IP-54	Increase in consumer food safety and reduction of food waste as a result of the Group's initiatives to combat food waste (e.g. participation of Ebro Foods in the Waste Warrior Brand Community, collaboration with AECOC, campaigns and actions to raise society and employee awareness of issues, etc.).	I+	A	OO Down		
O-14	Greater resilience in the Group's production processes due to broad diversification of the Group's supply chain which enables it to mitigate the risks and availability of raw materials over time.	O	P	Ups OO Down	Short term	

#### KEY: Impact

I+: Positive Impact   I-: Negative Impact   O: Opportunity   R: Risk   P: Potential   A: Actual

#### KEY: Value Chain (VC)

Ups: Upstream   OO: Own Operations   Down: Downstream

### IRO-1. Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

\*(11)

The process for identifying the IROs is described in ESRS 2 SBM 3 and IRO 1. In particular, for the impacts, risks and opportunities related to resource use and circular economy we considered: (i) the list of products and by-products of our principal production processes, (ii) the Group's Long-Term Sustainability Plan, called Heading for 2030, (iii) different external initiatives in which the Group participates (e.g. Too Good To Go), and (iv) sectoral best practice; and more specifically, information related to consumers and consumer habits (Kantar and Mintel panels, market information related to end-customers). We also used the historic information available on the raw and auxiliary materials used by the Group and the level of re-use or treatment of disposable items as an element of analysis.

The analysis considered stakeholders such as local administrations, customers of by-products generated by the Group or consumer panels, although no specific consultations were made.

The material positive impacts identified include waste reduction and recovery and recycling of materials.

The Group takes several actions related to the use and re-use of certain waste, such as rice husk, as fuel, or in animal feed, or in wood chips that can be used as fuel.

Our principal actions related with the recycling of materials are associated with changes in the packaging material of our products and our commitment to ensure that our packaging is 100% recyclable by 2030.

The reduction of food waste achieved by Group initiatives in collaboration with different organisations, such as campaigns and actions to raise society and employee awareness of this issue, was also considered a possible positive impact.

The increased resilience of our production processes achieved through ample diversification of the supply chain was identified as an opportunity, as it enables us to mitigate risks and increase the availability of raw and auxiliary materials. This type of action is at the core of our environment-related risk mitigation strategy.

No material risks or negative impacts were determined in connection with this matter.




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## E5-1. Policies related to resource use and circular economy

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\*(14,15)

The Group's Sustainability, Environment and Corporate Social Responsibility Policy guides our processes, activities and decisions to protect the environment, prevent and minimise environmental impacts, optimise the use of natural resources and preserve biodiversity. It specifically contemplates the development of programmes and measures to promote circular economy and zero waste, but does not address the storage and sustainable use of renewable resources.

However, this Policy does not address the IROs related to resource use and circular economy. Nor does it address the transitioning away from use of virgin resources or the sustainable sourcing and use of renewable resources.

SUSTAINABILITY, ENVIRONMENTAL AND CORPORATE SOCIAL RESPONSIBILITY POLICY	
MDR-P 65(a)	<b>Contents:</b> Through this Policy, the Group makes sustainable growth the pillar of its business management strategy, undertaking commitments to its principal stakeholders, namely its professionals, shareholders, communities, public and environment.
E5-1 14	
E5-1; 15	The environment-related principles, commitments, targets and strategy, especially those related to resource use and circular economy, establish the undertaking to optimise their use and to prevent and minimise environmental impacts.
E5-1; 16	Oversight and monitoring fall within the remit of the Audit, Control and Sustainability Committee, which reports to the Board of Directors.
MDR-P 65 b)	<b>Scope:</b> Ebro Group
MDR-P 65 c)	<b>Most senior level accountable for implementation:</b> The Board of Directors is the body responsible for its approval
MDR-P 65 d)	<b>Disclosure of third-party standards or initiatives to which Group commits</b> <ul style="list-style-type: none"> <li>• Section 529 ter Corporate Enterprises Act (LSC)</li> <li>• Principle 24 of the Code of Good Governance of the National Securities Market Commission (CNMV)</li> </ul>
MDR-P 65 e)	N/A
MDR-P 65 f)	<b>Availability:</b> The Policy is available on the Group's corporate website ( <a href="#">Politica-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a> ).

## E5-2. Taking action to manage IROs

\*(19,20e,68a,b,c,69)

### MDR-A: Waste management

ACTION	SCOPE*	SUPERVISION	TIME HORIZON	CAPEX (THOU €)
Increase recyclability and reduction at the Communay plant as a new packaging solution to reduce the quantity of plastic used in promotional sales	OO	Lustucru Premium Group (Garofalo France, Lustucru Frais and Lustucru Riz)	Short and medium term	131
TOTAL				131

**KEY: Scope\***

Ups: Upstream OO: Own Operations Down: Downstream

The investment indicated in the above table is part of the total investments made by the Group, disclosed in **Note 9** to the accompanying consolidated annual accounts. This investment is at an initial stage and its execution will be completed during 2025, with an additional investment contemplated of approximately €1.5 million.

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, re-use and recycling)
- \* Make society aware of this problem and the need to reduce food waste

The initiative is supported by over 600 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.

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### E5-3. Targets related to resource use and circular economy

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\*(23,24,25)

The Long-Term Sustainability Plan "HEADING FOR 2030" establishes the following Group-level targets related to resource use and circular economy:

#### TARGETS RELATED TO WASTE MANAGEMENT:

- \* Zero waste, Progress towards circular economy by increasing the re-use and recovery of waste through prevention and efficiency practices such as:
  - Re-use of rice husk as a renewable energy source and in animal feed and livestock bedding
  - Joining ECOEMBES on a European level
  - Recycling containers at all the Group's workplaces

#### TARGETS RELATED TO INCREASE OF CIRCULAR PRODUCT DESIGN AND MINIMISATION OF PRIMARY RAW MATERIALS

- \* Eliminate 20% of plastics through actions designed to reduce the thickness of packaging materials, seek plant-based alternatives and substitute paper for plastic.
- \* 100% of our packaging recyclable or reusable, replacing triplex or duplex materials that are not recyclable with single-material packaging that is recyclable.

All the targets are related to the layer of waste hierarchy of avoidance/minimisation, recycling, recovery and elimination.

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, S.A. 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.

The targets defined in the Long-Term Sustainability Plan HEADING FOR 2030 are related to the commitment established in the Group's policy to optimise resource use and circular economy and to avoid and minimise environmental impacts.

The targets have 2021 as their base year, and they are absolute and relative to the entire scope of the Group's own operations.

The methodology used was developed internally, based on the prior materiality assessment and market, consumer and legislative trends. This analysis not only enabled us to identify the areas with the greatest impact, but also served as a diagnosis to assess the current situation. In view of the outcome of this process, we defined strategic targets aligned with the Group's principal impacts, challenges, risks and opportunities.

There are no data available on the evolution of this indicator.

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## E5-4. Resource inflows

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\*(30,31,32)

Our raw materials used are divided into two major categories:

- \* Those used in the preparation of finished goods.
- \* Those used for the packaging materials.

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

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

OVERALL TOTAL WEIGHT OF PRODUCTS AND MATERIALS USED	2024		2023	
CATEGORY OF PRODUCT AND MATERIAL	WEIGHT (TONNES)	%	WEIGHT (TONNES)	%
Technical materials (packaging)	130,766	5%	92,291	4%
Biological materials (raw materials)	2,319,424	95%	2,414,054	96%
<b>TOTAL</b>	<b>2,450,190</b>		<b>2,506,345</b>	

Rice is our main raw material (85%), followed by wheat (10%) and other ingredients (5%).

The packaging materials for finished products are mainly plastic (63.1%), paper and cardboard (31.8%).

TYPE OF MATERIAL	2024		2023	
Plastic	82,570	63.10%	45,369	49.20%
Paper/Cardboard	41,684	31.80%	45,771	49.60%
Glass	18	0.01%	0	0.00%
Metal	1	0.00%	4	0.00%
Others	6,630	5.10%	1,146	1.20%
<b>TOTAL (tonnes)</b>	<b>130,766</b>		<b>92,291</b>	

With regard to packaging used, the following companies and facilities are excluded from the Ebro Group's reporting perimeter owing to the lack of data available:

- \* Arotz Foods (Navaleno)
- \* Indo European Foods (Felixstowe)

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

Each of the companies reports the quantities of packaging used in the reporting year. This information is mostly (86%) obtained from our internal management systems (SAP or similar, invoices or direct measurement) and the rest (14%) is estimated.

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, all the primary packaging used in our Group is virgin fibre.

The different secondary and tertiary packaging formats used by the different Group companies both contain 19% of recycled fibre.

RECYCLED FIBRE CONTENT	2024		2023	
Primary packaging	6,820	8.3%	1,287	2.0%
Secondary packaging	17,641	36.4%	24,468	61.0%
<b>Total recycled fibre (tonnes)</b>	<b>24,460</b>	<b>18.7%</b>	<b>25,755</b>	<b>27.9%</b>

## E5-5. Resource outflows

\*(37,38,39,40)

Most of the waste generated by our business is classified as non-hazardous waste, essentially the packaging of ingredients and auxiliary materials. 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.

99% of the waste generated in 2024 was non-hazardous waste.

WASTE	2024		2023	
Non-hazardous	63,745	99%	35,493	98%
Hazardous	461	1 %	712	2%
<b>TOTAL (tonnes)</b>	<b>64,205</b>	<b>100%</b>	<b>36,205</b>	<b>100%</b>

The breakdown by type of treatment is shown below:

NON-HAZARDOUS WASTE FOR DISPOSAL	2024		2023	
Landfill	9,044	14%	7,008	20%
Incineration	1,681	3%	635	2%
Other disposal operations	25,377	40%	1,020	3%
<b>TOTAL (tonnes)</b>	<b>36,102</b>	<b>57%</b>	<b>8,663</b>	<b>24%</b>

HAZARDOUS WASTE FOR DISPOSAL	2024		2023	
Landfill	355	77%	325	46%
Incineration	19	4%	327	46%
Other disposal operations	60	13%	5	1%
<b>TOTAL (tonnes)</b>	<b>433</b>	<b>94%</b>	<b>657</b>	<b>92%</b>

NON-HAZARDOUS WASTE DEVIATED FROM DISPOSAL (RECOVERED)	2024		2023	
Recycling	18,973	30%	8,854	25%
Preparation for reuse	107	0%		0%
Other recovery operations	8,633	14%	17,977	51%
<b>TOTAL (tonnes)</b>	<b>27,714</b>	<b>43%</b>	<b>26,831</b>	<b>76%</b>

HAZARDOUS WASTE DEVIATED FROM DISPOSAL (RECOVERED)	2024		2023	
Recycling	24	5%	48	7%
Preparation for reuse	0.21	0%	0	0%
Other recovery operations	2.79	1%	6	1%
<b>TOTAL (tonnes)</b>	<b>27</b>	<b>0%</b>	<b>54</b>	<b>8%</b>

WASTE DESTINATION	2024		2023	
Total Waste Eliminated	36,535	57%	9,320	26%
Total Waste Re-used	27,741	43%	26,885	74%
<b>TOTAL (tonnes)</b>	<b>64,276</b>		<b>36,205</b>	

With regard to waste generated, the following industrial sites are excluded from the Ebro Group reporting perimeter owing to a lack of available data, as are all the Group's offices (18) due to their negligible contribution to total waste generated:

- \* **Transimpex:** Lambsheim.
- \* **Riviana Foods Canada:** Delta.
- \* **Riviana Foods:** Hazen y Colusa.
- \* **Arotz Foods:** Navaleno.
- \* **Indo European Foods:** Felixstowe.

The Group does not generate any radioactive waste.

All the waste generated in the activities of the Ebro Group is recovered or disposed: there is no option for non-recycled: non-recycled corresponds to disposed. The quantity and percentage of waste disposed corresponds to those of non-recycled waste.

Practically all the waste generated by our activities is classified as non-hazardous waste. This waste is from the milling and cooking processes and/or packaging. Most of the non-hazardous waste generated is composed of plastic, urban or municipal waste and food waste.

A very small proportion of waste generated is hazardous, consisting mainly of chemical products from packaging, sanitary waste and other materials used in the maintenance of our facilities.

Most of the companies in our Group have contracted the management of hazardous and non-hazardous waste to authorised waste disposal contractors. 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 re-use wherever possible.

The information on the quantity of waste management and final treatment received was obtained mostly (98%) from the waste management suppliers, who provide the information.



# SOCIAL INFORMATION



## ESRS S1

### OWN WORKFORCE

#### List of IROs associated with S1 (SBM-3)

##### Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH THE IRO
WORKING CONDITIONS					
IP-22	Greater satisfaction of workers as a result of oversight of workers' rights in the Group through the implementation of fair labour practices (e.g. adequate working times, adequate wages, control of occupational hazards). This not only strengthens the capacity of its workforce, but also contributes to social and economic stability in the communities in which it operates, promoting a fair and equal working environment that improves the well-being of the workers and their families.	I+	A	OO Down	Sustainability, Environmental and Corporate Social Responsibility Policy  Remuneration Policy for Directors of Ebro Foods, S.A.  Code of Conduct of the Ebro Group
IP-24	Greater access by workers to collective bargaining enabled by the Group through the existence of Works Councils that achieve improved working conditions and increase the proportion of workers covered by collective agreements, thus strengthening employment relationships. This contributes to workers' well-being and to social and economic stability in the communities in which the Group operates.	I+	A	OO Down	Sustainability, Environmental and Corporate Social Responsibility Policy  Code of Conduct
IN-24	Lack of equal pay, performance or length of service recognition or conditions of inequality deriving from a heterogeneous distribution of workforce remuneration not based on objective criteria (pay gap).	I-	P	OO Down	Short term  Remuneration Policy for Directors of Ebro Foods, S.A.  Code of Conduct of the Ebro Group
O-20	Improvement of Group's reputation thanks to a good health and safety management system (e.g. certification under ISO 45001). The Group thus demonstrates its commitment to protecting the health and well-being of its workers. This not only reduces the possibility of occupational injuries and ill health, but also boosts the confidence of both employees and other stakeholders, such as customers, investors and local communities.	O	P	OO Down	Short term  Sustainability, Environmental and Corporate Social Responsibility Policy Code of Conduct of the Ebro Group

##### KEY: Impact

I+: Positive Impact I-: Negative Impact O: Opportunity R: Risk P: Potential A: Actual

##### KEY: Value Chain (VC)

Ups: Upstream OO: Own Operations Down: Downstream



## Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH THE IRO	
TRAINING AND SKILLS DEVELOPMENT						
R-61	Difficulty in attracting talent specialised in areas such as maintenance and electromechanics, which generates a critical operating risk for Ebro and its subsidiaries, as these jobs are essential to guarantee the continuous functioning of machinery and essential equipment.	R	A	OO Down	Short term	Code of Conduct of the Ebro Group
DIVERSITY AND INCLUSION						
IP-29	Workers' confidence thanks to the creation of a culture of respect and safety among the Group's workers through implementation of the EU Whistleblowing Directive and the Internal Reporting System, boosting the confidence of society in the working environment and contributing to the building of safer, fairer communities.	I+	A	OO Down		Policy on the Internal Reporting System and Whistleblower Protection  Code of Conduct of the Ebro Group
O-23	Increase in responsible brand value due to the implementation of policies that promote equal pay and equal opportunities based on gender, race, sexual orientation, disability, etc. in the company. This will promote the Group's position in the market as a socially responsible company committed to the inclusion of disability and diversity.	O	P	OO Down	Short term	Sustainability, Environmental and Corporate Social Responsibility Policy  Remuneration Policy for Directors of Ebro Foods, S.A.  Policy on the Selection of Directors and Diversity in the Composition of the Board of Directors de Ebro Foods S.A.
PROMOTION OF HUMAN RIGHTS						
R-22	Theft, leaks or unauthorised access to private or confidential information of the company or third parties, intellectual property or financial information of the Group; and cyber attacks that also cause interruptions in the Group's commercial transactions due to its highly automated and digitalised production processes and research and development.	R	P	OO Down	Short term	Code of Conduct of the Ebro Group

### KEY: Impact

I+: Positive Impact   I-: Negative Impact   O: Opportunity   R: Risk   P: Potential   A: Actual

### KEY: Value Chain (VC)

Ups: Upstream   OO: Own Operations   Down: Downstream

## SBM-3. Material impacts, risks and opportunities and their interaction with strategy and business model

\*(14,15,16)

The Ebro Group's most valuable asset is its **6,636 professionals, of whom 5,667 are direct employees of the Group and 969 are contracted** through different external agencies. It is a very close-knit group 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 quality employment while strengthening their skills and abilities, as well as their personal and professional leadership skills.



The workers of the Ebro Foods Group are classified into the following groups:

- \* **Own workforce or employees:** Number (annual average) of workers who are on the payroll of Group companies, regardless of the type of contract, i.e. those with permanent or temporary contracts, full-time or part-time, and non-guaranteed hours contracts.
- \* **Supervised workers:** Number (annual average) of workers who habitually work in situ for the organisation, but are not on the payroll (temping agency staff, subcontractors, etc.).
- \* **Independent contractors:** Number (annual average) of workers legally recognised as self-employed workers.

Both supervised workers and independent contractors are included in the category of non-employees.

### IMPACTS, RISKS AND OPPORTUNITIES

In the Double Materiality Assessment made to determine the IROs related to own workforce, as described in the table at the beginning of this chapter, a potential negative impact was identified in our employees owing to a lack of equal pay, which could lead to a loss of talent potential due to an increase in the salary competitiveness of other companies in the sector. The Group is firmly committed to reducing and eventually eliminating the gender-based pay gap, for which purpose we have implemented equal opportunity policies and established equality plans that guarantee fair treatment of men and women at all levels in our organisation.

The Group also fosters well-being at work and enhances the working conditions of our employees through the implementation of fair practices, which include adequate working times, a fair pay policy and effective control of occupational hazards. These measures not only strengthen employees' skills and abilities, but also contribute towards social and economic stability in the communities in which the Group operates, promoting a fair environment and favouring the workers' well-being.

In addition, thanks to the decentralised personnel management policy of the Group, we have a high level of knowledge and contact with the workforce, through a structure comprising the Human Resources managers of all the most important companies in the Group and the implementation of their own policies supplementing the labour laws in place for each one, taking account of the peculiarities of the countries in which they operate. Those policies include general guidelines regulating company-worker relationships as well as specific guidelines on Health and Safety at Work, Training and Education, Diversity and Equal Opportunities and Equal Pay for Men and Women.

Access to collective bargaining is favoured by the existence of Works Councils in the countries in which that figure exists, which help to improve working conditions and increase the percentage of employees covered by collective agreements, consolidating labour relations and benefiting both employees and the social and economic environment.

The commitment to equal treatment and opportunities is set out in initiatives such as the EU Whistleblowing Directive and the Internal Reporting System (IRS). Within the structure of the IRS, a Corporate Whistleblowing Channel has been enabled for the entire Group, through which anyone can inform Ebro Foods, S.A., as parent, of any possible irregularities detected in any of the Group companies. All this boosts the confidence of employees and society in general, strengthening the culture of respect and safety in the workplace, while helping to build fairer, more inclusive communities.

Above all the subsidiaries' policies and plans is the corporate Code of Conduct, which aims to guarantee not only the responsible, ethical conduct of all the professionals of all the subsidiaries of the Ebro Group in the performance of their activities, but also to be a benchmark to define the minimum targets of the employment guarantees and policy.



## **RISKS AND OPPORTUNITIES DERIVING FROM THE IMPACTS AND DEPENDENCIES**

The Group reaffirms its commitment to improving working conditions through initiatives focusing on health, safety, equality and diversity. The implementation of a health and safety management system, certified under international standards such as ISO 45001, has significantly strengthened the Group's reputation. This system reflects our firm commitment to protect the health and well-being of our employees, thereby reducing the risks of work-related injuries and ill health. Moreover, these measures help to generate confidence among workers and also among customers, investors and local communities.

The Group also promotes policies that foster equal opportunities and equal pay, thereby guaranteeing a working environment that is fair for all, regardless of gender, race, sexual orientation or disability. These initiatives not only boost inclusion and diversity, but also raise the Group's value as a socially responsible brand, positioning it as a benchmark in the market for its commitment to social justice and respect for diversity.

One of the risks deriving from the dependencies identified in the materiality assessment was the challenge of attracting specialised talent in key areas such as maintenance and electromechanics. The availability of qualified professionals in these areas is fundamental to guarantee operating efficiency and continuity in our production activities.

Moreover, information security and data protection are priorities for the Group, in view of the advancement of digitalisation and automation in our processes. Adequate management of these aspects is key to preserving the integrity of confidential information and guaranteeing business continuity in the face of potential cyber-risks.

The Group implements advanced measures and technologies to minimise these risks, securing both data protection and the stability of our operations.

## **CLIMATE TRANSITION PLANS**

The Group is currently studying the possible adoption of a climate transition plan to reduce the environmental impact of our operations and advance towards greater sustainability. In this process we will see that any decisions made take account of our workers' well-being, ensuring that the initiatives implemented contribute to both the efficiency and sustainability of our business and to a safe, stable working environment.

## **RESPECT FOR HUMAN RIGHTS**

Although some of the Group's operations are performed in countries where there are widespread risks of forced labour and child labour, the Group makes sure that those practices do not occur in our value chain through continuous risk assessment. The Ebro Group applies strict control mechanisms, audits and assessments in its own operations and throughout its supply chain to avoid and mitigate any possible incident related with these issues.

Moreover, the Code of Conduct of the Group and the Supplier Code of Conduct establish the fundamental principles of action in respect of Human Rights and working conditions, making sure that both own operations and those performed by third parties meet the highest ethical and legal standards.

In this context, through regular assessments and monitoring mechanisms, the Group has not identified any significant risks of forced or compulsory labour or child labour in its own operations. It has also made sure that there are no groups within its workforce which, owing to their geographical location, type of activity or specific working conditions, are at risk of having their rights violated.



Based on the material risks and opportunities identified in the Double Materiality Assessment, we identified that risk for the specific group of workers in the maintenance and electromechanics areas, which is a critical operating risk for the Ebro Group (specifically in the USA; it is not critical in other geographical regions), because those jobs are fundamental to guarantee the continuous operation of essential machinery and equipment. In this context, the principal measures implemented are:

- \* Pay rises
- \* Definition of new categories to increase our success in attracting candidates
- \* Recruitment in other regions (e.g. for USA, in Spain and Latin America)
- \* Use of subcontractors
- \* More flexible access conditions
- \* Stronger alliances with local training centres and polytechnic universities

No opportunities were identified for any specific group of workers.

S1-1. Policies related to own workforce

\*(19,20,21,22,23,24)

CODE OF CONDUCT OF THE EBRO FOODS GROUP	
MDR-P 65(a)	<p><b>Contents:</b></p> <p>The Code of Conduct (COC) sets out the principles and values that should inspire the actions of the companies and persons in the Ebro Foods Group and the rules binding on the Professionals in the performance of their duties (point 7).</p> <p>In section "IV. THE PROFESSIONALS OF THE EBRO FOODS GROUP", the COC establishes the rules and guidelines for the Group's workforce in the following points:</p> <ul style="list-style-type: none"><li>9. Human Rights</li><li>10. Professional loyalty</li><li>11. Professional development and training</li><li>12. Work-life balance</li><li>13. Pay policy</li><li>14. Commitment to health and safety</li><li>15. Right to privacy and data protection</li><li>16. Conflicts of interest</li><li>17. Gifts</li><li>18. Confidential information</li><li>19. Inside information</li><li>29. Anti-corruption, bribery, illegal commissions, influence peddling and money laundering</li><li>30. Circulation and acceptance among the Professionals</li><li>32. Whistleblowing channel</li></ul>

## CODE OF CONDUCT OF THE EBRO FOODS GROUP

S1-1_Par.20  S1-1_Par.22	<p>With regard to our professionals, the <b>Code of Conduct</b> contemplates, in point 9, <b>Commitment to human rights</b>. In this section it establishes the following rules:</p> <p>9.1. Relationships among all Professionals shall be based at all times on respect for other people's dignity and <b>non-discrimination</b>.</p> <p>9.2. The Group prohibits <b>abuse of authority and any kind of physical or psychological harassment</b>, as well as any other conduct that may generate an intimidating, offensive or hostile working environment.</p> <p>9.3. The Group rejects any form of direct or indirect <b>child labour</b>.</p> <p>9.4. <b>Forced, compulsory labour</b> is not permitted in any Group company.</p> <p>9.5. The Group promotes and upholds <b>equal treatment</b> and equal opportunities for all Professionals, regardless of their race, colour, nationality, ethnic origin, religion, gender, political or sexual orientation, civil status, age, disability or family responsibilities, as a principle applicable in the recruitment of Professionals, training, career opportunities, pay levels and all other aspects of relationships with Professionals.</p> <p>9.6. The Group does not prevent or restrict exercise by its Professionals of their <b>right to freedom of association, trade union membership and collective bargaining</b>, in accordance with prevailing laws and regulations.</p> <p>9.7. The Group respects and promotes human rights and acknowledges that they are fundamental, universal rights and should be construed and recognised in accordance with international laws and practice.</p>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>The Group COC, as stipulated in point 4, is applicable to:</p> <p>4.1. Each and all of the Professionals, regardless of their hierarchical level, position and geographical location.</p> <p>4.2. Customers, suppliers, shareholders and other stakeholders with which the Ebro Foods Group interacts in its operations.</p> <p>4.3. Extended to any other persons related with the Group or the Professionals whenever, by virtue of the nature of that relationship, their actions may in any way affect the reputation of the Group or any of its companies</p>
MDR-P 65(b)	<p><b>Most senior level accountable for implementation:</b></p> <p>The Audit, Control and Sustainability Committee will regularly report to the Board of Directors of Ebro Foods</p>
MDR-P 65(d)  S1-1_Par.21; AR12	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b></p> <p>The COC is available on the Group's corporate website (<a href="#">Código-de-Conducta</a>).</p> <p>Privately, this Code is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.</p>

## SUSTAINABILITY, ENVIRONMENT AND CORPORATE SOCIAL RESPONSIBILITY POLICY OF THE GROUP

MDR-P 65(a)	<p><b>Contents:</b></p> <p>The Group undertakes, as an essential principle in its actions, the creation of a business model that is respectful of and sustainable for the environment and society overall and, while ensuring value, profitability and competitiveness, it promotes diversity, respect for human rights, tax responsibility and the prevention of corruption, thus contributing towards the progress of society and generating trust among our stakeholders.</p> <p><b>Principles of action</b> (point 5) The most relevant points are:</p> <p>5.3. With regard to the management of human capital and development of talent</p> <p>5.4. With regard to Human Rights</p> <p>With regard to our own workforce, the stakeholder being "<b>Our team</b>", (point 6.1), the Policy establishes the following:</p> <ul style="list-style-type: none"> <li>• The personal and professional development of directors, executives and employees of the Group is promoted, encouraging them to improve their skills and abilities.</li> <li>• All actions related with the selection, hiring, training and internal promotion of professionals are based on the principles of equal opportunities and non-discrimination and clear criteria of capacity, competence and professional merit.</li> <li>• A good work-life balance is encouraged, helping our professionals to achieve a good balance between their family and labour responsibilities and respecting their right to privacy in all aspects.</li> <li>• Professionals are offered fair pay in keeping with the labour market.</li> <li>• We endeavour to guarantee a safe, healthy work environment for our professionals. Our companies are expected to take all reasonable measures to maximise the prevention of work-related risks.</li> </ul>
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### SUSTAINABILITY, ENVIRONMENT AND CORPORATE SOCIAL RESPONSIBILITY POLICY OF THE GROUP

<p>S1-1_Par.20</p> <p>S1-1_Par.22</p>	<p>This Policy is supplemented and developed, in respect of our professionals, by the basic principles and rules for action established in the Internal Code of Market Conduct, the Code of Conduct, the Senior Executive Remuneration and Incentive Policy and the Policy on the Selection of Directors and Diversity in the Composition of the Board.</p> <p>In particular, the <b>Code of Conduct of the Group</b> sets out the Group's commitments to Human Rights (point 9) regarding:</p> <ul style="list-style-type: none"> <li>9.1. Respect for other people's dignity and non-discrimination</li> <li>9.2. Prohibit abuse of authority and any kind of harassment, as well as any conduct that might generate an intimidating, offensive or hostile working environment</li> <li>9.3. Reject any form of direct or indirect child labour</li> <li>9.4. Not permit forced, compulsory labour in any Group company</li> <li>9.5. Uphold equal treatment and opportunities for its Professionals</li> <li>9.6. Not prevent or restrict exercise by its Professionals of their right to freedom of association, trade union membership and collective bargaining, in accordance with prevailing laws and regulations</li> <li>9.7. Respect and promote human rights in accordance with international laws and practice</li> </ul>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>The Policy is applicable to the Company and the Group. The Group companies may also develop their own internal regulations on any subject-matter falling within the scope of this Policy, provided they do not contradict the principles established therein or in other applicable internal Policies or Codes related with this one and lay down more stringent requirements.</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b></p> <p>The Board of Directors is responsible for its approval and the Audit, Control and Sustainability Committee for its oversight and implementation.</p>
<p>MDR-P 65(d)</p> <p>S1-1; Par.21_ AR 12</p>	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> <li>• Conformity with section 529 ter of the Corporate Enterprises Act ("LSC")</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b></p> <p>This Policy is available on the Group's corporate website (<a href="#">Política-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a>).</p> <p>Privately, this Policy can also be found in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.</p>

### POLICY ON THE INTERNAL REPORTING SYSTEM AND WHISTLEBLOWER PROTECTION OF THE EBRO FOODS GROUP

MDR-P 65(a)	<p><b>Contents:</b></p> <p>The Internal Reporting System is the preferential channel for reporting any action or omission that may constitute:</p> <ul style="list-style-type: none"> <li>(i) breaches of EU Law on the terms stipulated in Act 2/2023; or</li> <li>(ii) serious or very serious criminal or administrative breaches.</li> </ul> <p>For this purpose, the Internal Reporting System guarantees that the reports will be handled effectively and the whistleblower will not suffer any retaliation for reporting.</p> <p><b>"Persons responsible for management of the reporting channels integrated in the IRS" (4.2.3):</b></p> <ul style="list-style-type: none"> <li>• "Report Handling Procedure Act 2/2023";</li> <li>• "Report Handling Procedure Harassment";</li> <li>• "Report Handling Procedure Code of Conduct";</li> <li>• Information reported through the local reporting channels: "I the administrators of the local reporting channels shall notify the System Administrator of any reports received" at Group level.</li> </ul> <p><b>"Principles applicable" (point 5), stipulates the following, in detail, with respect to the IRS:</b></p> <ul style="list-style-type: none"> <li>• Zero tolerance of improper conduct</li> <li>• Accessibility</li> <li>• Security and confidentiality</li> <li>• Whistleblower protection</li> <li>• Protection based on good faith</li> <li>• Protection of persons concerned</li> <li>• Impartiality and transparency</li> <li>• Proportionality</li> </ul>
	<p>The Internal Reporting System is part of the compliance structure of the Ebro Group, along with the Code of Conduct, the Crime Prevention Model, the corporate Policies approved by the Board and other components of that structure, particularly the Risk Control and Management Policies.</p>

**POLICY ON THE INTERNAL REPORTING SYSTEM AND WHISTLEBLOWER PROTECTION OF THE EBRO FOODS GROUP**

MDR-P 65(b)	<p><b>Scope:</b> The Policy is applicable to all internal reporting channels and the procedures for handling information integrated in the Internal Reporting System. It is applicable to all and any reporting of potential irregularities or breaches of the laws applicable to the Company and its Group that may be made through any of the internal reporting channels by anyone who has acquired that information within the context of an employment or professional relationship with the Company or any of the other companies in the Ebro Group. It is extended to the Ebro Foundation.</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b> Audit, Control and Sustainability Committee and/or any relevant Committee that delegates to the Board of Directors of the parent.</p>
MDR-P 65(d)	<p><b>Recognition Global Frameworks:</b></p> <ul style="list-style-type: none"> <li>• Act 2/2023: Report Handling Procedure</li> <li>• Directive 95/46/EC (General Data Protection Regulation)</li> <li>• Organic Law 7/2021</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b> This Policy is available on the Group's corporate website, (<a href="#">Política-sobre-el-Sistema-Interno-de-Información-y-protección-al-informante</a>), together with access to the Whistleblowing Channel. This is the case for all Group subsidiaries with a corporate website.</p>

**POLICY ON THE SELECTION OF DIRECTORS AND DIVERSITY IN THE COMPOSITION OF THE BOARD OF DIRECTORS OF EBRO FOODS S.A.**

MDR-P 65(a)  S1-1; 21(a)	<p><b>Contents:</b> This Policy, applicable exclusively to the Directors of the Ebro Group, establishes the following "<b>Applicable Principles</b>" (point 4):</p> <ul style="list-style-type: none"> <li>• All nominations for the selection of candidates shall be based on a prior analysis of the needs of the Board. The outcome of this analysis shall be set down in the reasoned report issued by the Nomination and Remuneration Committee, which shall be published on calling the general meeting at which the ratification, appointment or re-election of each director is to be laid before the shareholders.</li> <li>• Endeavours shall be made at all times to favour the diversity of expertise, experience, age and gender on the Board.</li> <li>• In the selection process, efforts shall be made to avoid any implicit bias that may entail discrimination on whatsoever grounds against any of the candidates.</li> <li>• In a situation in which the candidates are in equal conditions, the one whose gender is least represented on the board at that time shall be chosen.</li> <li>• The Company has set the target for the gender least represented on the Board to account for no less than 40% of all the Board members by the end of 2022 and thereafter.</li> </ul> <p>In turn, explicit mention is made of (point 5): "<b>Conditions to be met by candidates</b>":</p> <ul style="list-style-type: none"> <li>• Candidates to be board members shall be honourable, suitable persons in good standing, with professional experience and competence.</li> <li>• They shall also have the necessary qualifications and professional training required by the office considering the needs of the Board, and sufficient availability to be able to duly perform their duties.</li> </ul>
MDR-P 65(b)	<p><b>Scope:</b> The Policy covers both the appointment, ratification and re-election of directors by the general meeting and appointments made by the Board by cooptation in the event of a pre-term vacancy. When candidates for appointment as directors are legal persons, the principles and criteria of this Policy shall be observed by the individuals who are to represent them on the Board.</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b> Nomination and Remuneration Committee of the Ebro Group</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Corporate Enterprises Act</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b> This Policy is private; it can be found on the different intranets of the Group.</p>

## REMUNERATION POLICY FOR DIRECTORS OF EBRO FOODS, S.A.

MDR-P 65(a)	<p><b>Contents:</b></p> <p>(Point 3): "<b>Principles and targets governing Directors' remuneration. Contribution of the policy to the strategy, interests and long-term sustainability</b>" establishes the following:</p> <p>"The Directors' Remuneration Policy is based on the following principles (which in turn correspond to the applicable legal provisions and the criteria underlying the relevant good governance recommendations):</p> <ul style="list-style-type: none"> <li>(i) Directors shall be remunerated according to their duties, responsibilities and dedication. This remuneration shall be such as to retain talent and acknowledge the directors' track record.</li> <li>(ii) The remuneration shall be set according to the importance of the company, its economic situation from time to time and comparable market standards.</li> <li>(iii) Directors' remuneration should be reasonable without compromising their independence of judgement, especially that of non-Executive Directors.</li> <li>(iv) ) The remuneration system of Directors, especially that of Executive Directors for their executive duties, shall be designed to boost the Company's long-term sustainability and profitability and maximise its value for the benefit of all its shareholders, avoiding excessive exposure to risks and reward for unfavourable results.</li> </ul> <p>In this regard, an attractive remuneration scheme has been designed for Executive Directors (and other senior executives of the Group) with a view to attracting and retaining talent and professional worth on the one hand, and securing an adequate balance between the profit of the Company and its Group and risk exposure on the other."</p>
S1-1; 21(a)	<p>(Point 5.) "<b>Consideration of the employment and pay conditions of the Company's employees when drawing up the remuneration policy</b>"</p> <ul style="list-style-type: none"> <li>• In accordance with its Sustainability, Environment and Corporate Social Responsibility Policy, the Ebro Foods Group has set itself the binding principle of offering all its professionals (which include directors, executives and other employees) fair pay in keeping with the labour market. In doing so, the Group seeks to retain talent and stimulate the motivation of all its professionals as a means to guarantee the long-term sustainability of its business.</li> <li>• The remuneration of all employees, executives or otherwise, is set according to criteria of office, duties and competences, professional worth and level of responsibility, as well as the particular circumstances of the company, country and market in which each employee works. Based on these criteria, the Group's remuneration system is considered fair and reasonable at all levels.</li> <li>• The remuneration packages of Directors, especially those with executive duties, are essentially structured in a similar way to those of the senior executives in the Group.</li> </ul>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>The present remuneration system of Executive Directors for performing executive duties and other aspects of their contractual relationship with the Company take into account that the only Executive Director who performs those duties is a controlling shareholder of the Company.</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b></p> <ul style="list-style-type: none"> <li>• Nomination and Remuneration Committee of the Ebro Group</li> </ul>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• In pursuance of section 529 of the Corporate Enterprises Act (LSC), this Directors' Remuneration Policy will remain in force for the following three years, from 1 January 2025 to 31 December 2027, without prejudice to any amendment to or replacement of the Policy during that time, which would have to be approved by the General Meeting of Shareholders.</li> <li>• Article 22 of the Articles of Association</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b></p> <p>This Policy is available on the Group's corporate website (<a href="#">Politica-de-Remuneraciones-de-Consejeros-2025-2027</a>).</p>

## COMMITMENTS TO OUR WORKERS IN RESPECT OF HUMAN RIGHTS AND EMPLOYMENT SECURITY

The Human Rights commitments of the Ebro Group are set out in several key documents, essentially in the Code of Conduct and the Sustainability, Environment and Corporate Social Responsibility Policy.

The **Code of Conduct** explicitly establishes, in its chapter on "Human and Labour Rights", the obligation to respect the fundamental rights of our workers, ensuring that all our operations are performed according to conditions of respect, equality and compliance.

The **Sustainability, Environment and Corporate Social Responsibility Policy** establishes the commitment to comply with the UN Guiding Principles on Business and Human Rights and the ILO fundamental conventions to ensure a fair, safe, discrimination-free working environment.



Through the principles set out in this regulatory framework, such as the promotion of stable employment, continuous training, professional development, freedom of association, non-discrimination, diversity and equal access to employment, we promote a working environment that prioritises the growth and well-being of the Group's employees.

We also promote equal opportunities and diversity in the work environment, guaranteeing respect and fair, equal treatment for everyone, regardless of their gender, age, origin or any other personal condition. This commitment is reflected in the non-discrimination policies and in the implementation of measures to foster equal pay and equal access to promotion and professional development opportunities.

To address possible impacts related to Human Rights, the Group has a whistleblowing channel accessible by all our employees. This mechanism allows them to report confidentially, and even anonymously, any incident related with workers' rights, guaranteeing an adequate investigation and the implementation of remedial measures where necessary. Internal and external audits are made to supervise compliance with policies and awareness and training actions are provided for employees and executives to guarantee the identification and prevention of possible violations of Human Rights within the Group and its supply chain.

As mentioned earlier, the Group's Human Rights policy framework follows the principles established by the International Labour Organization (ILO) and the United National Global Compact. In particular, the Group is aligned with:

- ✱ **The ILO Fundamental Conventions**, which include the prohibition of child labour, forced labour and discrimination in employment and promotion of the freedom of association and collective bargaining.
- ✱ **The UN Guiding Principles on Business and Human Rights**, which ensure respect for Human Rights in all our operations and throughout our supply chain.
- ✱ **The Ten Principles of the UN Global Compact**, with specific commitments in Human Rights, employment standards, environment and anti-corruption.
- ✱ **The Universal Declaration of Human Rights**, which provides the basis to guarantee all our employees fair and decent treatment.

The Group policies expressly prohibit any form of labour exploitation, including forced labour and child labour. And although human trafficking is not expressly mentioned, its prohibition is implicitly understood, as these policies are aligned with the above-mentioned international frameworks. With regard to discrimination, our Code of Conduct specifies in chapter IV, point 9.5 that the Group promotes and upholds equal treatment and equal opportunities for all Professionals, regardless of their race, colour, nationality, ethnic origin, religion, gender, political or sexual orientation, 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.

To guarantee effective application of these guidelines, the Group and its companies have internal procedures that enable them to prevent, mitigate and remediate possible situations of discrimination. These procedures include regular internal audits to assess compliance, specific training programmes to raise awareness among the workforce and promote a culture of respect and inclusion, and a whistleblowing channel, mentioned elsewhere in this Statement, which is confidential and accessible by all employees.

In addition, the Human Resources departments conduct targeted monitoring to ensure fairness in the selection, promotion and remuneration processes, thus helping to create a diverse and inclusive working environment.





With regard to management of the health and safety of the Group's professionals, all our companies have implemented a Work-Related Hazard Prevention System that applies specific protocols in each workplace, ensuring compliance with the local laws and regulations on health and safety. As part of the efforts made to reduce work-related accidents, the different subsidiaries work on improving safety, by preventing and limiting risks deriving from their business activities, and make improvements to equipment and installations with a view to minimising potential hazards. Training courses are also given, adapted to each job to inform and train employees and make them aware of the work-related hazards. This commitment to the health and welfare of our workforce also takes the form of regular medical check-ups and the promotion of healthy lifestyles within the working environment.

### SOCIAL AUDITS IN OWN WORKPLACES

During 2024, 7 social audits were conducted, at the following Group plants:

COMPANY	COUNTRY	PLANT	DATE	TYPE OF AUDIT	AUDITOR
Herba Cambodia	Cambodia	Phnom Phen	22/04/2024	SMETA 4P	UL Responsible Sourcing
Ebro India Pvt Ltd	India	Taraori	23/10/2024	SMETA 4P	DNV
Bertagni 1882 SPA	Italy	Arcugnano	10/04/2024	SMETA 4P	BUREAU VERITAS CPS - EMEA
		Avio	18/03/2024		
		Villanova Monferrato	15/01/2024	SMETA 4P	SGS Italy
Herba Ricemills SLU	Spain	San Juan	30/01/2024	SMETA 4P	Intertek Spain
Herba Bangkok	Thailand	Nong Khae	16/09/2024	BSCI	Amfori

We made 17 audits at Group plants in 2023:

COMPANY	COUNTRY	PLANT	DATE	TYPE OF AUDIT	AUDITOR
Herba Ricemills	Spain	San Juan	07/02/2023	SMETA	Intertek Spain
	Spain	Algemesi	03/07/2023	SMETA	
	Spain	Los Palacios	28/06/2023	SMETA	
Bertagni 1882 SPA	Italy	Avio	14/03/2023	SMETA	Bureau Veritas Certification
	Italy	Arcugnano	29/03/2023	SMETA	
Ebro India	India	Taraori	03/11/2023	SMETA	DNV
Herba Bangkok	Thailand	Nong Khae	03/10/2023	SMETA	SGS
Herba Cambodia	Cambodia	Phnom Phen	24/04/2023	SMETA	UL Responsible Sourcing
Ebro Foods Netherlands	Netherlands	Wormer	10/05/2023	SMETA	SGS CBE Belgium
Ebro Ingredients	Netherlands	Plant D	10/05/2023	SMETA	
	Belgium	Schoten	01/07/2023	SMETA	
Ebro Foods Belgium	Belgium	Merksem (Plant A)	01/07/2023	SMETA	SGS Italy
Mundi Riso	Italy	Vercelli	24/10/2023	SMETA	
S&B Herba Foods	UK	Fulbourn (Cambridge)	16/11/2023	SMETA	Bureau Veritas Certification
Pastificio Lucio Garofalo	Italy	Gragnano	22/02/2023	SA8000	DNV
			19/01/2023	Customer audit	Arche Advisors
			27/09/2023	Customer audit	Bureau Veritas

## S1-2. Processes for engaging with own workforce and workers' representatives about impacts

\*(27,28)

The Group has implemented several procedures and communication channels to encourage dialogue and collaboration with our workforce. These mechanisms enable employees to express their employment-related concerns and needs effectively. The principal channels available are:

- \* Corporate and subsidiary websites
- \* Corporate Intranet
- \* Suggestion box
- \* Social networks
- \* Communication mailbox
- \* Digital newsletter
- \* Blogs (corporate and brands)
- \* Mailshots
- \* Departmental events
- \* Works Council
- \* HR contacts
- \* Corporate Communications Department
- \* Annual Report
- \* Whistleblowing channel

### MECHANISMS FOR DIALOGUE AND CONSULTATION WITH OWN WORKFORCE

The Ebro Group encourages the participation of its workforce in decision-making and in managing actual and potential impacts through different mechanisms for consultation and communication.

### ENGAGEMENT WITH OWN WORKFORCE IN DECISION-MAKING PROCESSES

Employees' perspectives and opinions inform the Group's decisions and activities through tools such as:

- \* **Annual work climate surveys** conducted in several Group companies to collect employees' views on their working environment and detect areas for improvement.
- \* **Meetings with workers' representatives** to address key issues such as working conditions, pay adjustments and conflict-solving.
- \* **Health and Safety Committees**, present in most of the Group's companies, through which employees can exercise their rights of participation and consultation on work-related hazard prevention topics.

### COMMITMENT TO OWN WORKFORCE AND WORKERS' REPRESENTATIVES

The Ebro Group implements its commitment to its own workforce through engagement with the workers' legal representatives, such as the Works Councils and Employee Delegates in the companies that have them, which facilitate dialogue and the joint solving of employment issues of common interest.

### **STAGE, TYPE AND FREQUENCY OF ENGAGEMENT**

Employee engagement takes place at different stages in the employment management and organisational impact process. However, the frequency of meetings varies according to the company and its specific needs. There is no set frequency for all Group companies.

### **OPERATIONAL RESPONSIBILITY IN THE PROMOTION OF ENGAGEMENT**

The Human Resources Department in each Group company, together with the Health and Safety officers and the corresponding committees, has operational responsibility to ensure engagement with our own workforce. They assess employees' contributions and take them into account in the decision-making processes with a view to continuously improving the working environment and management of impacts.

Apart from joining the United Nations Global Compact, the Group does not have any Global Framework Agreements or other specific agreements with workers' representatives on Human Rights in employment. However, our commitment to respecting the Human Rights of our workforce is reflected, apart from joining the UN Global Compact, in the implementation of internal policies, such as the Code of Conduct and other mechanisms of dialogue with our employees.

### **ASSESSING THE EFFECTIVENESS OF OUR COMMITMENT TO EMPLOYEES**

The effectiveness of our commitment to our workforce is assessed through an approach based on active listening and continuous improvement. The Group and its companies systematically analyse information collected in the different spaces for dialogue, identifying trends, emerging needs and opportunities for improvement.

Internal surveys, when they are made, give us an insight into employees' perceptions on key aspects of the working environment, while meetings with workers' representatives facilitate the interchanging of ideas and proposals. Additionally, analysis of the topics discussed at Health and Safety Committee meetings and the response to consultations and suggestions received through the internal channels help not only to identify but also to assess the impact of the measures adopted.

### **IDENTIFICATION OF WORKERS IN VULNERABLE SITUATIONS AND MEASURES ADOPTED**

The Group engages in proactive monitoring to detect possible situations of vulnerability within its workforce, with a view to guaranteeing a fair and inclusive working environment. Although we do not establish specific categories of employees at risk, continuous dialogue with our teams enables us to identify circumstances that might require additional support measures. Apart from the formal mechanisms for participation, the Human Resources managers play a key role in identifying specific needs and implementing the necessary measures.

The Group also has confidential communication channels, the Whistleblowing Channel and other additional channels implemented in some companies under their local laws, designed so that any worker can raise concerns securely and without fearing retaliation. In this regard, flexible working arrangements, initiatives to improve well-being and actions to help employees strike a good work-life balance contribute towards minimising possible inequalities and ensure that all employees have a working environment suited to their needs.

### S1-3. Processes to remediate negative impacts and channels for own workforce to raise concerns

\*(32,33)

The Ebro Group has implemented an Internal Reporting System (IRS) to facilitate open, secure communication between the workforce and the company, guaranteeing confidentiality, anonymity and protection of the whistleblowers. Within the structure of the IRS, a Corporate Whistleblowing Channel has been enabled for the entire Group, through which anyone can inform Ebro Foods, S.A., as parent of the Group, of any possible irregularities detected in any of the Group companies.

The IRS establishes clear procedures for receiving, investigating and resolving complaints submitted. The head of the Internal Reporting System is responsible for dealing with any reports received, ensuring adequate processing in accordance with the IRS Policy and the Manual of Procedures.

Apart from the corporate channel, the subsidiaries of the Group that are obliged by local law to have complaints channels maintain those local channels. The Policy on the Internal Reporting System and Whistleblower Protection and the Manual of Procedures regulate the necessary mechanisms to guarantee adequate handling of the reports received, according to the criteria established in Act 2/2023 regulating protection of those who report breaches of law and regulations and anti-corruption provisions.

The Audit, Control and Sustainability Committee oversees the functioning of the IRS, guaranteeing confidentiality and the possibility of submitting anonymous reports, respecting the rights of the reporting person and the person concerned. In addition, the Internal Reporting System Administrator is responsible for seeing that reports are investigated and managed effectively in accordance with the applicable laws and regulations in place.

All the Group employees were informed of the implementation of the IRS and the associated Policy through the Human Resources Departments in their respective companies, which were previously informed by the Group's Department of Communication and Social Responsibility. This ensures that our workforce is aware of and trusts the channels available for raising concerns or expressing needs. The IRS also establishes protective measures to prevent any retaliation against employees who use the complaint channels in good faith.

The Corporate Whistleblowing Channel is available for all stakeholders on the Group's corporate website, in the section "Contact" <https://www.ebrofoods.es/contacto/> and on the websites of the different subsidiaries. In companies that do not have a website, it is advertised through other channels, such as within the signatures on e-mails, on notice boards, etc.

In the parent it is also possible to access the Channel from its intranet, where we have created a section called "Internal Reporting System of the Ebro Group", which contains the link to the channel, called "Access to the Corporate Whistleblowing Channel of the Ebro Foods Group".



## S1-4. Taking action to manage IROs

\*(38,39,40,41,43,62)

Specific actions are taken in respect of Group personnel management with a view to attaining the global targets defined in our Long-Term Sustainability Plan “HEADING FOR 2030”. These actions include especially the Human Rights Training Scheme, which is compulsory for all employees of the Company, launched in 2022 and completed in 2024. This Training Scheme, adapted to the different professional categories, was given online through the e-learning SAP Litmos platform for professionals with a corporate e-mail account, and in person for factory workers.

In addition, the Ebro Group has implemented a number of measures related with health and safety, retaining talent, work-life balance and professional development, among other matters. These measures are developed by the different subsidiaries thanks to the decentralisation model.

### MEASURES TO PREVENT OR MITIGATE NEGATIVE IMPACTS

The Group companies have a framework for action to identify and respond to actual or potential negative impacts on their professionals:

- \* Monitoring and early detection: risks and areas for improvement are detected through internal reports and audits.
- \* Assessment of impact: the scale of the problem is analysed and possible solutions are discussed with the Human Resources teams, which immediately report to the respective Management Committee.
- \* Definition of remedial action: specific actions are established to resolve the problem effectively.
- \* Monitoring and adjustment: the actions are implemented and their effectiveness is assessed, making any necessary adjustments.

In this regard, to ensure that the initiatives and actions implemented are effective, they are monitored through:

- \* Unemployment indicators: we assess key metrics such as employee satisfaction, talent-retaining rates and professional development.
- \* Work climate surveys: we collect employees’ perspectives on their well-being in the company, their feeling of belonging and working conditions.
- \* Internal and external audits: we oversee compliance with our policies and labour standards.
- \* Review of complaints and suggestions.

On a global level, the principal measures adopted to prevent negative impacts and guarantee the well-being and development of our workforce are:

- \* Diversity and Inclusion Policies: we promote a fair, respectful work environment, guaranteeing equal opportunities.
- \* Training and Development Programmes: we offer continuous training to enhance the employability and professional growth of our employees.
- \* Health and Safety at Work: we implement strict safety protocols in all our operations to minimise work-related hazards.
- \* Fair Working Conditions: we apply competitive compensation, salary and benefit policies to guarantee fair working conditions.

Both the Group and its companies have established different mechanisms to address and repair any possible negative impacts that may arise, such as:

- \* Communication and reporting channels: we have internal mechanisms through which employees can report any situation of risk or vulnerability.
- \* Psychological support and welfare assistance: support is offered through specific assistance programmes in any situations that so require.
- \* Review and improvement of processes: when an incident or negative impact is identified, the subsidiaries analyse the causes and apply remedial action within their areas of management.

With regard to actions and strategies developed to mitigate the material risks deriving from dependencies and track their effectiveness, we have:

- \* Training in Occupational Hazard Prevention: protocols establishing regular training in health and safety at work.
- \* Safety protocols: implementation of strict safety measures at all plants and workplaces.
- \* Continuous supervision: monitoring of incidents and plans for improvement based on real data.
- \* Assessment of psychosocial risks: analysis of work-related stress, workload and emotional well-being.

#### **INITIATIVES TO GENERATE POSITIVE IMPACTS**

The following general initiatives are promoted, among others:

- \* Personalised career plans: the internal career advancement of our employees is fostered through training itineraries and internal promotions.
- \* Work-life balance: flexible working times, working from home, parental leave, family-related leave, etc.
- \* Health and well-being programmes: Sports activities, medical check-ups and mental health support to foster a cultural of integral well-being.
- \* Acknowledgement initiatives: internal acknowledgements to motivate professional commitment, pay rises or variable remuneration based on objectives.
- \* Welfare benefits: pension schemes, life insurance and medical care, advance payment of salary, payment in kind, medical subsidies and aids for the education of employees' children.

In this context, our subsidiaries use the following tools, among others, to pursue material opportunities:

- \* Leadership and mentoring programmes: training to identify and strengthen internal talent.
- \* Internal mobility and promotion: encouraging professional development within the Group.
- \* Investment in digitalisation and new skills: development of skillsets for future work.

The Group makes sure that our work-related policies and practices are responsible and do not harm our professionals through:

- \* Compliance with the labour laws in place in each country in which we operate.
- \* Compliance audits: internal and external audits to see that ethical and legal standards are met.
- \* Fostering of a business culture based on respect and fairness, in which the dignity of each worker is a priority.

## RESOURCES ASSIGNED TO THE MANAGEMENT OF MATERIAL IMPACTS

The Ebro Group allocates significant resources to the management of employment-related impacts:

- \* Specialist Human Resources teams: professionals specialising in the implementation and supervision of labour policies.
- \* Specific budget for training and well-being: investment in training programmes, work-related health and welfare benefits.
- \* Safety and prevention infrastructure: equipment and technology to guarantee safe work environments.
- \* Measuring and reporting systems: tools to assess the impact of initiatives and make informed decisions.

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### S1-5. Targets related to managing incidents

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\*(81)

At present, the Ebro Group does not have any quantifiable targets regarding its workforce. However, it has established four key principles that provide a reference framework and must be followed in all the Group's subsidiaries:

- \* Foster a safe, respectful, inclusive work environment.
- \* Promote career advancement and talent retention.
- \* Favour the balancing of employees' personal and professional lives.
- \* Ensure compliance with the ethical and human rights principles in personnel management.

This notwithstanding, these qualitative targets are defined and adaptation for each subsidiary taking account of the peculiarities of their respective work environment and local regulatory framework. The workforce and workers' representatives participate in this area in different ways:

- \* Setting of targets: Employees and their representatives participate in setting the targets through different consultation mechanisms, such as work climate surveys, meetings with Works Councils or similar figures and structured dialogue with union representatives in countries where there is formal workers' representation. These mechanisms enable employees' concerns and expectations to be taken into account in human resources management strategies.
- \* Performance monitoring in respect of targets: In subsidiaries that have Works Councils or similar figures, this monitoring is essentially channelled through them. The workers' representatives analyse and discuss any progress in respect of safety, professional development and work-life balance, contributing to the review and adjustment of employment strategies. In companies that do not have these representative bodies, there are other options for dialogue, such as regular meetings with management or internal communication channels through which monitoring is shared.
- \* Identification of improvements and lessons learned: Employees are informed of the improvements made and lessons learned through the different internal communication mechanisms established in each subsidiary. These include informative meetings with management, feedback sessions organised in Works Councils or spaces for dialogue with union representatives, internal newsletters, corporate digital platforms and training programmes, making sure that the workforce is up to date with the progress made and can incorporate them in their day-to-day activities.

The Group has no plans to establish quantitative targets at Group level within a given timeline.

## S1-6. Characteristics of the Group's Employees

\*(50a,50b+51,50c,50,50d)

Our people, their personal well-being and their professional development, are one of the Ebro Group's principal objectives in Social Responsibility.

As mentioned earlier, the Ebro Group's most valuable asset is its **5,667 professionals**, who are the foundation for its success and the driving force behind its development.

### CHARACTERISTICS OF THE GROUP'S EMPLOYEES:

INFORMATION ON NUMBER OF EMPLOYEES BY GENDER	
GENDER	NUMBER OF EMPLOYEES (HEADCOUNT)
Male	4,000
Female	1,667
Other	-
Not reported	-
<b>Total number of Employees</b>	<b>5,667</b>

\* The gap between the number of 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.

The number of employees in the Group is determined using the annual average and full-time employment, which gives a more precise, consistent representation of the workforce over the year. A full-time employee is one who performs their duties during the maximum time established in the labour laws of their country of residence or the conditions established in the applicable collective agreement.

Employees are considered to be workers who have an employment contract with one of the Group companies, regardless of whether the contract is permanent, temporary, non-guaranteed hours, full-time or part-time.

### NUMBER OF EMPLOYEES IN COUNTRIES THAT REPRESENT MORE THAN 10% OF THE TOTAL NUMBER OF EMPLOYEES

COUNTRY	NUMBER OF EMPLOYEES
Spain	918
United States	1,028
France	612
Italy	824



## EMPLOYEES BY GENDER AND TYPE OF CONTRACT

The Ebro Group offers its workers stable, quality employment and a solid professional career, where 93% of the jobs are permanent.

FEMALE	MALE	OTHER	TOTAL
<b>Number of employees</b>			
1,667	4,000	0	<b>5,667</b>
<b>Number of permanent employees</b>			
1,541	3,705	0	<b>5,246</b>
<b>Number of temporary employees</b>			
113	259	0	<b>372</b>
<b>Number of non-guaranteed hours employees</b>			
12	37	0	<b>49</b>
<b>Number of full-time employees</b>			
1,557	3,931	0	<b>5,488</b>
<b>Number of part-time employees</b>			
109	70	0	<b>179</b>

The average headcount of the Group in 2024, including employees and non-employees, is 6,636 professional, rather than the 6,510 indicated in **Note 7.4** to the Annual Financial Statement 2024. This difference is due to the fact that the Annual Financial Statement does not include independent contractors (self-employed workers) (27) or the workers of the subcontractors of the subsidiary Herba Ricemills (110).

## EMPLOYEE TURNOVER

During the year, 693 employees left the Group, equivalent to a turnover of 12%. This includes both employees who voluntarily left the Group and those dismissed, retired or deceased.

## S1-8. Collective bargaining coverage and social dialogue

\*(60a-c, 63a-b, AR70)

69% of the employees in the Ebro Group are covered by the collective bargaining agreements of their respective business areas or some other kind of employment agreements.

The remainder are top executives of the Group, the professionals of the North American and European companies (no longer used in certain geographical regions), those of 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.

There is, however, no representation by a European works council (EWC), a European Company (SE) works council or a European Cooperative Society (SCE) works council.

EEA COUNTRIES	% EMPLOYEES COVERED BY COLLECTIVE AGREEMENTS AND OTHER AGREEMENTS	% EMPLOYEES COVERED BY SOCIAL DIALOGUE
Belgium	100.00%	100.00%
Denmark	76.92%	100.00%
France	100.00%	99.67%
Germany	0.00%	0.00%
Hungary	0.00%	0.00%
Italy	100.00%	82.77%
Netherlands	98.85%	0.00%
Portugal	100.00%	0.00%
Spain	100.00%	90.52%

The figures in the above table are for countries in the EEA; those not in the EEA are reported in the following table, by continent:

CONTINENT	% EMPLOYEES COVERED BY COLLECTIVE AGREEMENTS AND OTHER AGREEMENTS	% EMPLOYEES COVERED BY SOCIAL DIALOGUE
North America	44.39%	13.67%
South America	72.97%	72.97%
Asia	52.56%	46.22%
Africa	38.94%	100.00%
Europe <sup>(1)</sup>	9.50%	0.00%

**Note:** <sup>(1)</sup> United Kingdom is reported here

## S1-9. Diversity metrics

\*(66a-e, AR71)

### TOP MANAGEMENT

Number of employees in the category of top management, by gender:

	MEN		WOMEN	
	NO. EMPLOYEES	%	NO. EMPLOYEES	%
Top Management	11	73%	4	27%

The Chief Operating Officer (COO) of the Ebro Group, who is the highest-ranking executive of the Ebro Foods Group after the Executive Chairman, the heads of the principal departments of Ebro Foods, S.A. and the heads of the Ebro Group business units are considered “top management” for this purpose, even if their respective employment relationships are not specified as “top management”.

## CLASSIFICATION OF EMPLOYEES BY AGE GROUP

AGE GROUP	NO. OF EMPLOYEES	% OF TOTAL EMPLOYEES
Under 30 years old	782	13.80%
30-50 years old	2,900	51.17%
Over 50 years old	1,985	35.03%
<b>TOTAL</b>	<b>5,667</b>	

## S1-10. Adequate wages

\*(69, 70)

The Ebro Group confirms its commitment to the principles of fairness and non-discrimination, guaranteeing that the remuneration of its employees adequately reflects their professional worth, skills, experience, responsibilities undertaken and results achieved. In most of the Group's companies, wages are above the minimum wage established in each country in which it operates and are never below that level, ensuring fair, competitive remuneration. This commitment underscores the Group's decision to establish fair working conditions and to foster the economic well-being of all our professionals.

## S1-12. Persons with disabilities

\*(79, 80, AR76)

The Group strives to achieve socio-occupational integration through the direct hiring of 106 employees with different abilities (1.87% of total employees) and indirect job generation through special employment centres.

MEN		WOMEN	
NUMBER	%	NUMBER	%
72	1.27%	34	0.60%



1.27%

Men with disabilities



0.60%

Women with disabilities

All professionals with different abilities are included, regardless of the degree of disability recognised officially.

During 2024, 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 2024 (€)	AMOUNT 2023 (€)
C.E.E. DE MADRID	Printing	1,672	4,207
C.E.E. INSERCIÓN PERSONAL DISCAPACITADOS " IPD"	Cleaning head office in Madrid	86,845	83,701
TOTAL		88,517	87,908

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 reducing and constantly reviewing their workload.

## S1-14. Health and safety metrics

\*(88a-e, 89c)

100% of the Group companies and their respective production plants have an Occupational Hazard Prevention and Management System. This System uses both internal means and external firms, which work together to identify and mitigate risks.

94% of the Group's workforce is represented on the Health and Safety Committees that exist at our workplaces.

### HEALTH AND SAFETY ASPECTS COVERED IN FORMAL AGREEMENTS WITH UNIONS

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

- 1. Global agreements:** in accordance with ILO principles, organisational structures for problem-solving, commitments regarding target performance or the level of practice to apply.
- 2. 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.

The production plants of Herba Ricemills in Spain and Pastificio Lucio Garofalo in Italy have implemented a work-related injury prevention system aligned with ISO 45001 on Occupational Health and Safety.

Other Group companies such as Lustucru Frais, Riviana Foods, Riviana Foods Canada Corporation, Indo European Foods, S&B Herba Foods, Herba Cambodia, Herba Bangkok, Arrozeiras Mundiarrroz, Mundi Riso, Harinas Santa Rita and Ebro India, have risk prevention policies and agreements to provide a safe and healthy work environment, identifying and remediating potential work-related hazards at their workplaces.

This approach reinforces the Group's commitment to protecting the health and well-being of our employees, guaranteeing optimum safety standards in all our operations.

Unfortunately, there was one fatality from a work-related accident during the year involving an employee of Riviana Foods. There were no fatalities as a result of work-related injuries among non-employees.

	NUMBER
Lost time work-related injuries <sup>(1)</sup>	204
Frequency rate <sup>(2)</sup>	18.09
Work-related ill health <sup>(3)</sup>	11
Lost days <sup>(4)</sup>	9,802

**Notes:**

<sup>(1)</sup> This total includes both accidents on the way to and from work and those occurring at work suffered by our entire workforce (employees and non-employees).

<sup>(2)</sup> The frequency rate is equivalent to the number of cases recorded (lost-time injuries) for each million hours worked by the total workforce (employees and non-employees).

<sup>(3)</sup> The cases of work-related ill health refer to employees.

<sup>(4)</sup> The lost days refer to work-related injuries and ill health of our employees.

As part of our efforts to reduce accidents at work, the different Group companies strive to improve safety by preventing and limiting risks deriving from their operations, making improvements to the equipment and installations used in order to reduce risks. They also run training courses to cover the needs for information, training and awareness regarding the work-related hazards corresponding to each job and workstation.

The Group's commitment to the health and well-being of our professionals is also implemented through regular medical check-ups and promotion of healthy lifestyles.

## S1-16. Remuneration metrics (pay gap and total remuneration)

\*(97a-c)

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 orientation, civil status, age, disability or family responsibilities, as a principle behind all human resources policies and applicable in the recruitment of professionals and in training, career opportunities, pay levels and all other aspects of relationships with professionals.

Building on 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, S&B Herba Foods and Lustrucru Frais have a Policy for Equal Opportunities in Employment; and the parent Ebro Foods, S.A. and the subsidiaries Ebro India, Herba Ricemills and Riviana Foods have Anti-Discrimination, Harassment and Bullying Policies.

The parent, Ebro Foods, S.A., has implemented a Gender Equality Plan that permanently guarantees equal treatment and equal opportunities for men and women and elimination of any gender-based inequalities and situations of discrimination that may arise in the company. In this regard, the Equality Plan Negotiating Committee of Ebro Foods, S.A. drew up the Protocol for Sexual Harassment and Gender-based Harassment of Ebro Foods, which was supplemented with training in the matter for all professionals in the Company.

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.

<b>PAY GAP</b>	<b>30%</b>
<b>REMUNERATION RATIO</b>	<b>26.69</b>

The following formula was used to calculate the gender pay gap:

Difference between the average gross hourly pay level of male and female employees expressed as a percentage of the average gross hourly pay level of male employees.

The annual total remuneration ratio of the highest paid individual (General Manager of one of our subsidiaries) to the median annual total remuneration for all employees (excluding the highest-paid individual) was 26.69 times.

It should be noted that Ebrofrost Denmark and Transimpex did not provide information on the remuneration of their employees. Consequently, they were not taken into account to calculate the pay gap and remuneration ratio.

## S1-17. Incidents, complaints and severe Human Rights impacts

\*(103, 104)

The cases indicated below are incidents of discrimination or harassment submitted to the Equal Employment Opportunity Commission (EEOC). The EEOC is a US government agency that investigates complaints of harassment or discrimination against employers presented by existing or, more often, former employees. This Commission investigates the case and determines whether there are grounds to proceed with the charge or notifies the parties that it will not continue with the case and dismisses it. This process can take months, or even more than a year, depending on the agency. Once the Position Statement has been presented, the company waits for the outcome of the EEOC procedure.

	<b>NO. CASES PRESENTED</b>	<b>NO. CASES REVIEWED</b>	<b>NO. CASES SETTLED OR CONCLUDED</b>
Own employees	4	3	6
Supervised workers	1	1	0
<b>Total incidentes</b>	<b>5</b>	<b>4</b>	<b>6</b>

**Note:** During 2024, 5 cases were filed, of which 4 have already been reviewed, but none of them has yet been resolved. In this context, the 6 cases that appear as resolved or concluded in 2024, correspond to 6 cases that were submitted in 2023.

None of the complaints included in the above table was presented through the channels provided by the company for its stakeholders to voice their concerns, or to the National Contact Points for OECD Multinational Enterprises.

Moreover, none of these claims resulted in penalties, fines or compensations for damages.

There were no severe human rights impacts or incidents related with our own workforce.

## ESRS S2

### WORKERS IN THE VALUE CHAIN

#### List of IROs associated with S2 (SBM-3)

##### Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH THE IRO	
VALUE CHAIN RESPONSIBLE						
IP-38	Protection of children's rights for workers throughout the Group's value chain, strictly prohibiting child labour and forced labour as established in the Supplier Code of Conduct. This boosts social cohesion and sustainable development of the community.	I+	P	Ups OO Down	Short term	Supplier Code of Conduct  Sustainability, Environmental and Corporate Social Responsibility Policy
IN-39	Impact on work-life balance, personal well-being and family and social relations due to lack of oversight by the Group to ensure that the working conditions stipulated in the Supplier Code of Conduct are met, especially with suppliers of wheat and rice within the supply chain. This deficient oversight could result in violations of labour rights, affecting not only the workers but also their personal and social environments.	I-	P	Ups OO Down	Short term	Supplier Code of Conduct
O-29	Improvement of Group's reputation by establishing business relationships with selection criteria to guarantee secure, stable employment with adequate wages and working times. This can in turn improve the performance of work teams in the value chain, contributing towards achieving a more productive and satisfied labour force, which has a positive impact on our operating performance.	O	P	Ups OO Down	Short term	

##### KEY: Impact

I+: Positive Impact   I-: Negative Impact   O: Opportunity   R: Risk   P: Potential   A: Actual

##### KEY: Value Chain (VC)

Ups: Upstream   OO: Own Operations   Down: Downstream

## SBM-3. Material impacts, risks and opportunities

\*11,12,13

Most of the workers in the Ebro Foods Group value chain are in the following groups:

### Upstream

- \* Suppliers of agricultural raw materials (growers, mills, cooperatives and traders): Europe, North America, Argentina, Uruguay, India and Southeast Asia.
- \* Suppliers of auxiliary raw materials: Europe, North America and Asia.
- \* Logistics and service providers: geographical areas in which the Group has established subsidiaries (Europe, Africa, America and Asia).

### Own operations

- \* Service providers: geographical areas in which the Group has established subsidiaries (Europe, Africa, America and Asia).

### DOWNSTREAM

- \* Logistics providers: geographical areas in which the Group has established subsidiaries (Europe, Africa, America and Asia).

The value chain workers with potential exposure to material positive and negative impacts are upstream, especially in emerging countries in southeast Asia, India and Pakistan, where labour laws are as yet less developed. In this regard, the risk assessment made by Ebro Foods on its supply chain with the international risk assessment platform [Countryrisk.io](https://countryrisk.io) (section SUPPLY CHAIN RANKING) enabled us to identify that one of the specific groups with a higher risk of damage is that of women, since in countries such as Morocco, Thailand or India, they still face significant barriers to access the same labour opportunities and conditions as men, due to factors such as sociocultural rules, pay gaps and less access to resources and training, especially women who work in the fields. Accordingly, in the Action Plan we will develop within the next three years, one of the guidelines to be followed will be to take specific actions to improve the working conditions of this group.

In the same assessment, we found that the geographical areas with significant risks of child or forced labour are the same as those mentioned above: i.e. southeast Asia, India and Pakistan.

### MATERIAL IMPACTS ON VALUE CHAIN WORKERS

As seen in the table of IROs included at the beginning of this chapter, our Double Materiality Assessment (DMA) did not identify any actual negative impacts on the workers in our supply chain, but it did detect a potential negative impact related to the possible impairment of workers' work-life balance due to the absence of a regulation defining the work calendar and working hours, which is assessed in the social/ethics audits made in different Group companies.

Moreover, in order to strengthen cohesion and relations with our suppliers and service providers, the Group regularly develops different initiatives to generate a direct positive impact on workers in the value chain, focusing particularly on upstream workers as they are more exposed to risk.

- \* In the area of agricultural raw materials, the Group shares with its suppliers its considerable expertise in the promotion and investigation of sustainable environmental practices applicable to the crop, contemplating as principal and end-targets: (i) higher incomes for growers, (ii) optimised agricultural yields and (iii) climate change mitigation.



- \* In addition, the Group companies that manage the global sourcing of the raw material rice are working together with their agricultural suppliers on the assessment and verification of the crop sustainability under the FSA standard of the Sustainable Agriculture Initiative Platform (SAI Platform) or the SRP standard of the Sustainable Rice Platform. The use of one standard or the other depends on the geographical area. In some cases, they are also collaborating with those suppliers to obtain the Organic Farming or Fair Trade seals, thus giving their crops a boost in sustainability and quality that will enable them to access a larger number of customers and increase their revenues.
- \* Training actions in different topics, such as health and safety, regulatory changes in the relevant regions, enhanced use of plant health products, etc., furthering our direct collaboration with suppliers.

According to the DMA of the Ebro Group, there are no risks deriving from the impacts and dependencies on value chain workers, overall or on particular or specific groups. On the contrary, there is a double potential opportunity for the Group: it can improve its reputation by establishing trading relations with ethical, social and environment selection criteria, which would lead to increased engagement with these workers and, consequently, increased productivity.

## S2-1. Policies related to value chain workers

\*16,17,18 & 19

SUPPLIER CODE OF CONDUCT OF THE EBRO FOODS GROUP	
<p><b>S2-1; 18</b></p> <p><b>MDR-P 65(a)</b></p>	<p><b>Contents:</b></p> <p>Apart from the Group's Code of Conduct, Suppliers' actions will also be governed by the following rules and principles:</p> <ul style="list-style-type: none"> <li>• Commercial integrity</li> <li>• Labour rules</li> <li>• Human Rights</li> <li>• Child labour</li> <li>• Forced or compulsory labour</li> <li>• Freedom of association and collective bargaining</li> <li>• Equal opportunities and non-discrimination</li> <li>• Wages and working hours</li> <li>• Health and safety</li> <li>• Workplace</li> <li>• Product safety and quality</li> <li>• Environment</li> <li>• Compliance with the Code</li> </ul>
<p><b>S2-1; 18</b></p> <p><b>S2-1; AR15</b></p>	<p>The <b>Supplier Code of Conduct</b> sets out the Group's commitments to the Human Rights (point 3.3) of the workers in its supply chain, establishing clear guidelines in the following points on:</p> <ul style="list-style-type: none"> <li>• (point 3.4.) <b>Child labour:</b> Children below 15 years of age, or below the minimum age of employment permitted by the ILO conventions shall not be contracted or employed.</li> <li>• (point 3.5.) <b>Forced or compulsory labour:</b> All forms of labour exploitation and forced or compulsory labour are expressly prohibited.</li> <li>• (point 3.6.) <b>Freedom of association and collective bargaining:</b> Suppliers shall recognise their employees' right to form part of collective associations representing workers' interests, in accordance with the applicable laws.</li> </ul>
<p><b>MDR-P 65(b)</b></p>	<p><b>Scope:</b></p> <p>The Code is applicable to all the Suppliers of companies in the Ebro Foods Group, without prejudice to any specific provisions that may be applicable in accordance with the local laws, customs and practice in different jurisdictions. It is also applicable to the Group companies and professionals (i.e. directors, executives and employees), who must foster compliance with the Code by the Suppliers they deal with.</p>
<p><b>MDR-P 65 c)</b></p>	<p><b>Most senior level accountable for implementation:</b></p> <p>The Group reserves the right to supervise and check compliance by its Suppliers of the rules and principles laid down in this Code.</p>

### SUPPLIER CODE OF CONDUCT OF THE EBRO FOODS GROUP

MDR-P 65(d)	<b>Disclosure of third-party standards or initiatives to which Group commits</b>
S2; 19 ; AR14	<ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<b>Availability:</b>
S2; AR16	The Supplier Code of Conduct is available on the Group's corporate website ( <u>Código-de-Proveedores</u> ). Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.

### SUSTAINABILITY, ENVIRONMENT AND CORPORATE SOCIAL RESPONSIBILITY POLICY

MDR-P 65(a)	<p><b>Contents:</b></p> <p>The Group thus undertakes, as an essential principle in its actions, the creation of a business model that is respectful of and sustainable for the environment and society overall and, while ensuring value, profitability and competitiveness, it promotes diversity, respect for human rights, tax responsibility and the prevention of corruption, thus contributing towards the progress of society and generating trust among our stakeholders.</p> <p>With regard to our own value chain workers, the stakeholder being "<b>Our Public</b>" (point 6.6), the Policy establishes the same principles and rules as the Supplier Code of Conduct, such that:</p> <p>"Suppliers are required to act in line with the principles and rules established in the Group in respect of the following matters:</p> <ul style="list-style-type: none"> <li>• Commercial integrity</li> <li>• Labour rules</li> <li>• Human Rights</li> <li>• Child labour</li> <li>• Forced or compulsory labour</li> <li>• Freedom of association and collective bargaining</li> <li>• Equal opportunities and non-discrimination</li> <li>• Wages and working hours</li> <li>• Health and safety</li> <li>• Workplace</li> <li>• Product safety and quality</li> <li>• Environment".</li> </ul>
S2-1; 18	This Policy is supplemented and developed by the other Policies and internal regulations of the Ebro Group, particularly the Group's Code of Conduct, <b>Supplier Code of Conduct</b> and the Policies on Social Action; Communication of Financial, Non-Financial and Corporate Information; Communication and Relations with Shareholders, Institutional Investors and Proxy Advisors; Risk Control and Management; and Corruption and Bribery.
S2-1; 18	This Policy is supplemented and developed by the other Policies and internal regulations of the Ebro Group, particularly the <b>Supplier Code of Conduct</b> (Group COCP)
S2-1; AR15	<p>It thus sets out the Group's commitments to the Human Rights (point 3.3), establishing clear guidelines in the following points on:</p> <ul style="list-style-type: none"> <li>• (point 3.4.) <b>Child labour;</b></li> <li>• (point 3.5.) <b>Forced or compulsory labour;</b> and</li> <li>• (point 3.6.) <b>Freedom of association and collective bargaining.</b></li> </ul>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>The Policy is applicable to the Company and the Group. The Group companies may also develop their own internal regulations on any subject-matter falling within the scope of this Policy, provided they do not contradict the principles established herein or in other applicable internal Policies or Codes related with this one and lay down more stringent requirements.</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b></p> <p>The Board of Directors is responsible for its approval and the Audit, Control and Sustainability Committee for its supervision and implementation</p>
MDR-P 65(d)	<b>Disclosure of third-party standards or initiatives to which Group commits</b>
S2; 19; AR14	<ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> <li>• Conformity with section 529 ter of the Corporate Enterprises Act ("LSC")</li> </ul>
MDR-P 65(e)	N/A

## SUSTAINABILITY, ENVIRONMENT AND CORPORATE SOCIAL RESPONSIBILITY POLICY

MDR-P 65(f)	<b>Availability:</b> This Policy is available on the Group's corporate website ( <a href="#">Politica-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a> ).
S2; AR16	Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.

### OUR COMMITMENT TO WORKERS IN THE VALUE CHAIN

The Ebro Group is firmly committed to sustainability and social responsibility throughout its value chain, incorporating ethical and environmental principles and respect for Human Rights in its business model. This commitment is developed through policies and regulations that guarantee protection of workers, compliance with international standards and promotion of responsible business practices. In particular, the Group strengthens its focus on Human Rights through the following key policies:

- i **Supplier Code of Conduct:** This sets out the Group's Human Rights commitments relevant to the workers in our supply chain. In point 3, it lays down clear guidelines for the elimination of discrimination in respect of employment and occupation, eradication of forced or compulsory labour, effective abolition of child labour and respect for their rights to freedom of association, union membership and collective bargaining, in compliance with the laws in place.
- ii **Sustainability, Environment and Corporate Social Responsibility Policy:** This establishes the Group's framework for action in respect of responsible business practices, making sure our suppliers operate under criteria of ethics, sustainability and respect for fundamental rights. In point 6.6., it specifies that the Ebro Group requires its suppliers to act in line with the Group's principles and rules (Code of Conduct) in the following key matters:
  - \* **Commercial integrity:** foster ethical and transparent business practices, securing action against corruption, bribery and any form of fraud in their trade relations.
  - \* **Labour rules:** promote decent working conditions, guaranteeing protection of the workers' rights established in international standards.
  - \* **Human Rights:** respect and protect the fundamental rights of all value chain workers, avoiding any form of abuse, exploitation or degrading treatment.
  - \* **Child labour:** prohibit the hiring of minors at any stage in the supply chain, ensuring that suppliers comply with local and international laws and regulations on the minimum age of employment.
  - \* **Slavery, servitude or forced labour:** eradicate any form of forced or compulsory labour, debt bondage or human trafficking within the supply chain.
  - \* **Freedom of association and collective bargaining:** guarantee workers' right to organisation, union membership and collective bargaining without fear or retaliation.
  - \* **Equal opportunities and non-discrimination:** ensure fair access to employment and professional development, eliminating any discrimination on the basis of gender, race, religion, sexual orientation or any other personal or social condition.
  - \* **Wages and working hours:** guarantee compliance with legal and regulatory standards regarding fair remuneration, working hours, rest and overtime.
  - \* **Health and safety at work:** require suppliers to adopt preventive measures and safety protocols that guarantee a safe and healthy work environment.
  - \* **Product safety and quality:** uphold high standards in the production and distribution of goods, ensuring that the products are safe and comply with quality standards.

- ✱ **Environmental protection:** implement sustainable practices throughout the supply chain, minimising environmental impact and promoting efficient use of natural resources.

This regulatory framework is aligned with:

- ✱ The Universal Declaration of Human Rights
- ✱ United Nations Guiding Principles on Business and Human Rights
- ✱ The ILO Fundamental Rights and Principles

Through the establishment of these policies and by joining the UN Global Compact, the Group pursues a double objective: (i) to guarantee compliance with international standards and (ii) to promote a culture of integrity and responsibility throughout our value chain. To reinforce this commitment, the Group has developed a structured approach for the detection, prevention and remediation of possible breaches -actual or potential- in respect of Human Rights throughout our value chain, consisting of the progressive implementation of a due diligence system that contemplates several tools for the management and remediation of impacts, such as: (i) monitoring and control mechanisms, (ii) human rights training, (iii) fostering of best practices and (iv) specific grievance channels. In particular, the Ebro Group has created an Internal Reporting System (IRS) that centralises and guarantees the protection of whistleblowers who act in good faith. This system incorporate the different complaints channels in the Group and provides a Corporate Whistleblowing Channel available for all stakeholders through the corporate website [www.ebrofoods.es/contacto/](http://www.ebrofoods.es/contacto/) and other internal means.

We have not to date identified any breaches of the UN Guiding Principles, the ILO Declaration of Fundamental Rights and Principles in the workplace or the OECD Guidelines for Multinational Enterprises in relation to value chain workers.

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## S2-2. Processes for engaging with value chain workers about impacts

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\*(22,23)

The Group uses two tools to gain an insight into the perspectives of value chain workers: on the one hand, social audits, which provide information on working conditions and respect for Human Rights; and on the other hand, frequent visits and meetings held by the Procurement departments of our subsidiaries with suppliers and service providers to check compliance with ESG standards and promote best practices, enabling them to obtain workers' views directly. These processes are applied equally to all groups in the chain because the Group has not deemed it necessary to apply any special measures for groups that might be considered particularly vulnerable, upholding that its actions cover all the possible spectra.

The Group engages either directly with suppliers (in respect of individual growers) or with representatives of the supply undertaking (in other cases) to verify fulfilment of its commitments. This engagement is carried out continuously throughout the trading relationship. Audits are valid for around two to three years, although the Group is in the process of designing a plan with structured timing, to be developed over the period 2025-2027. In some specific cases, the audits can be made annually.

The operational responsibility for company-supplier relations corresponds to the Procurement departments of the Group companies, and the effectiveness of engaging with them is assessed by tracking the incidents or breaches reported through the corporate Whistleblowing Channel, the outcomes of the social audits and, when working with agricultural suppliers, by monitoring and following up on the results achieved after the implementation of best practices.

Apart from the global framework provided by the United Nations Global Compact, the Group has no global framework agreements with unions or other bodies related with respect for Human Rights in value chain workers.

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## S2-3. Processes to remediate negative impacts

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\*(27,28)

### WHISTLEBLOWING CHANNEL AND GRIEVANCE MECHANISMS

During 2023, in pursuance of Act 2/2023 transposing the EU Whistleblowing Directive into national law, the Ebro Group established an Internal Reporting System (IRS).

Within the structure of the IRS, a Corporate Whistleblowing Channel has been enabled for the entire Group, through which anyone can inform Ebro Foods, S.A., as parent of the Group, of any possible irregularities detected in any of the Group companies. This Channel does not replace the complaints channels that some of our companies have established in pursuance of their local laws, but supplements them and has been implemented alongside the subsidiary's channel.

The Corporate Whistleblowing Channel is available for all stakeholders on the Group's corporate website, in the section "Contact" <https://www.ebrofoods.es/contacto/> and on the websites of the different subsidiaries. In companies that do not have a website, it is advertised through other channels, such as within the signatures on e-mails, on notice boards, etc.

In the parent it is also possible to access the Channel from its intranet, where we have created a section called "Internal Reporting System of the Ebro Group", which contains the link to the channel, called Access to the Corporate Whistleblowing Channel of the Ebro Foods Group.

To date, Ebro Foods has not assessed whether the workers in our value chain are familiar with and trust the channel as a tool for reporting their concerns. However, it intends to incorporate this assessment in its action plan for the next three years.

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## S2-4. Taking action to manage IROs

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\*(32)

### ACTIONS TO AVOID, MITIGATE AND REMEDIATE NEGATIVE IMPACTS

The Double Materiality Assessment made by Ebro Foods did not identify any actual material negative impacts on our supply chain. However, with a view to responding to any potential negative impact, the Group uses the Sedex Members Ethical Trade Audit (SMETA) protocol as a tool to reinforce its monitoring and control of respect of Human Rights, both within and outside the Group perimeter. The SMETA audit protocol is a method for assessing internal manufacturing sites according to a common set of corporate social responsibility standards developed for the consumer goods industry. In the specific case of our supply chain, apart from our corporate account on the Sedex Platform (where all the Group companies have already been registered and their respective suppliers are currently being registered), we continue enhancing our due diligence systems on Human Rights by developing internal capacities, frequent meetings and visits by Procurement Departments to their suppliers and the incorporation of best practices.

## Social audits

The audits carried out by the Ebro Group are essentially SMETA audits, although on occasions they are made under BSCI (Business Social Compliance Initiative).

SMETA audits include an assessment of key aspects such as labour standards, health and safety, the environment and business ethics, applying version 6.1 of the SMETA best practices. They cover all types of workers at the site, including direct employees, agency workers, employees of service providers and subcontracted workers.

The audits are based on different regulatory documents. A 2-pillar SMETA audit assesses fundamental aspects such as the Ethical Trade Initiative (ETI) Base Code, specific SMETA additions, universal rights according to the UN Guiding Principles, systems for management and implementation of the code, responsible recruiting, the right to work and immigration, as well as outsourcing and working from home. In a 4-pillar audit, in addition to the aspects mentioned above, specific assessments are included on the environmental impact and business ethics, along with compliance with the customer's Supplier Code.

Any non-compliance detected in respect of the ETI Code, the SMETA additions or local laws is recorded in the audit report, in the Corrective Action Plan Report (CAPR) and on the Sedex platform. However, when a non-compliance refers exclusively to requirements of the customer's Supplier Code and not the ETI Code or local laws, it is not reflected in Sedex, but is documented as an observation in the CAPR under the section "Variations in compliance between the ETI Code / SMETA Additions / Local laws and the Customer's Supplier Code".

In short, SMETA audits are used to assess compliance by a company in the supply chain in relation to labour rights, working conditions, environmental impact and ethical standards, ensuring identification of opportunities for improvement and implementation of the necessary measures to guarantee a responsible, sustainable labour and business environment.

## SMETA audits made during the year

74 SMETA audits were made in 2024, 12 more than in the previous year, on different suppliers in the Ebro Group's supply chain in countries such as Argentina, Italy, India, Thailand, France, United Kingdom and Pakistan.

Once the SMETA audit report has been issued, these audits are valid for at least 12 months, although in some cases they may have a longer validity. It is also possible for a supplier to be submitted to a partial monitoring audit to check that actions for improvement have been put into place to reduce the possibility of an actual or future risk.

In this regard, 6 of the 74 audits made in 2024 were made for this purpose. For example, in Pakistan a SMETA audit made by LRQA identified a Non-Compliance (NC) related with the fact that "the overtime bonus was not paid in compliance with the law", in reference to ETI Code 6.3. To remedy this situation, we worked with the supplier to implement a corrective action plan establishing that the plant should operate with 8-hour shifts, guaranteeing payment of the overtime worked with the corresponding bonus, in pursuance of the laws in place and the requirements of the EIT Code. Consequently, in the monitoring made 60 days later, the Non-Compliance was found to have been resolved satisfactorily.

COUNTRY	DATE OF AUDIT	AUDITORS
Argentina	22/07/2024	DNV
	01/07/2024	Bureau Veritas Certification
	10/07/2024	
	03/07/2024	
Belgium	12/02/2024	SGS CBE Belgium
	23/05/2024	DNV
Brazil	15/07/2024	Intertek Brazil
Cambodia	28/11/2024	SGS (Cambodia) Limited
China	15/10/2024	Intertek Shenzhen
	02/08/2024	SGS_China
France	08/10/2024	DNV
	16/07/2024	SGS France
	04/06/2024	
	13/11/2024	
	26/08/2024	Bureau Veritas Certification
	18/09/2024	
	09/01/2024	
Germany	19/02/2024	Intertek Germany
	22/07/2024	
	09/09/2024	Bureau Veritas Certification
Greece	28/05/2024	Intertek Bulgaria
	29/05/2024	
Hungary	18/09/2024	SGS CBE Hungary
India	22/07/2024	URS Certification Limited
	15/07/2024	DQS CFS GmbH
	09/05/2024	Intertek India
	17/09/2024	SGS ASIA
Ireland	12/02/2024	SGS_UK
	13/02/2024	
Italy	02/04/2024	LRQA
	19/08/2024	LRQA
	20/02/2024	BUREAU VERITAS CPS - EMEA
	26/09/2024	
	28/10/2024	
	13/02/2024	
	28/08/2024	
	27/08/2024	SGS Italy
	26/08/2024	
	29/08/2024	
	26/06/2024	
	20/05/2024	
	11/11/2024	Intertek Italy
	11/03/2024	
	18/12/2024	
	21/02/2024	
	26/11/2024	
	10/07/2024	
	10/07/2024	Eurofins Consumer Products Assurance
Mexico	13/06/2024	Intertek Mexico

COUNTRY	DATE OF AUDIT	AUDITORS
Pakistan	16/09/2024	LRQA
	12/02/2024	TUV Rheinland (TUEV Rheinland)
	28/11/2024	ALGI Pakistan
	12/11/2024	ALGI Pakistan
	04/07/2024	LRQA
	29/02/2024	Control Union
Peru	02/02/2024	Intertek Peru
	09/07/2024	SGS DEL PERU S.A.C.
	12/08/2024	SIPAS CR-PERU
Spain	08/03/2024	SGS Spain
	08/10/2024	Bureau Veritas Certification
Thailand	08/07/2024	SGS Thailand
	24/09/2024	
	14/05/2024	
	10/07/2024	
Turkey	21/08/2024	DQS CFS GmbH
	19/08/2024	
	07/02/2024	LRQA
United Kingdom	14/08/2024	BUREAU VERITAS CPS - EMEA
	28/02/2024	
	22/03/2024	SGS_UK
	17/12/2024	
	22/05/2024	
	23/09/2024	International Associates Limited
	04/11/2024	Verner Wheelock (incorporating KSSA)
	10/06/2024	

62 SMETA audits were made on suppliers in 2023:

COUNTRY	DATE OF AUDIT	AUDITORS
Argentina	26/06/2023	Intertek Argentina Uruguay and Paraguay
	11/07/2023	Bureau Veritas Certification
	12/07/2023	
	12/07/2023	
Austria	06/11/2023	Bureau Veritas Certification
France	27/06/2023	Intertek France
	01/06/2023	
	15/02/2023	SGS France
	23/01/2023	
	26/06/2023	
	13/12/2023	DNV
	30/03/2023	Bureau Veritas Certification
Germany	14/04/2023	Intertek Germany
	21/02/2023	SGS Germany
Greece	24/07/2023	Intertek Bulgaria



COUNTRY	DATE OF AUDIT	AUDITORS
India	14/04/2023	DQS India
	15/06/2023	DQS CFS GmbH
	28/03/2023	Intertek India
Ireland	18/08/2023	SGS_UK
	16/08/2023	
Italy	09/08/2023	Intertek Italy
	12/01/2023	
	01/01/2023	
	27/04/2023	
	14/11/2023	
	16/01/2023	BUREAU VERITAS CPS - EMEA
Mexico	17/05/2023	Intertek Mexico
Netherlands	04/05/2023	SGS CBE Belgium
	13/06/2023	
Pakistan	22/08/2023	ELEVATE
	19/06/2023	Eurofins South Asia
	14/02/2023	SGS Pakistan
	30/05/2023	SGS Pakistan
	21/11/2023	ALGI Pakistan
	26/12/2023	GSCS International Ltd
Peru	03/10/2023	Intertek Peru
	25/04/2023	SGS DEL PERU S.A.C.
	10/03/2023	SIPAS CR-PERU
	04/09/2023	
	23/11/2023	
Portugal	29/06/2023	SGS Portugal
Spain	26/04/2023	Bureau Veritas Certification
	30/10/2023	Intertek Spain
Switzerland	08/03/2023	Intertek Germany
Thailand	24/07/2023	SGS Thailand
	17/05/2023	
	07/08/2023	
	10/10/2023	
	07/08/2023	
Turkey	14/02/2023	ELEVATE
	19/06/2023	
United Kingdom	27/03/2023	BSI Group
	24/08/2023	SGS_UK
	27/03/2023	
	31/07/2023	
	06/12/2023	
	21/11/2023	
	27/11/2023	
	29/08/2023	
	04/10/2023	BUREAU VERITAS CPS - EMEA
USA	08/02/2023	Intertek Peru
	21/04/2023	

## ENGAGEMENT PROGRAMMES AND BEST PRACTICES

The Group constantly strives to boost initiatives and processes that generate a positive impact on the workers in our value chain, ensuring that none of them cause or contribute to material negative impacts on those workers. Through several multi-year initiatives focusing mainly on upstream companies, where the greatest potential risks of impacts were identified, the Group is working on improving working conditions, promoting sustainable development and enhancing workers' well-being. In this context, the principal programmes developed in 2024 were:

### \* Training on Climate-Smart Agriculture (CSA) in India

Begun two years ago and in line with its undertaking to improve the conditions of workers in its value chain, our subsidiary Ebro India is collaborating with Syngenta Group to train a group of agricultural suppliers from the village of Bakana, Radaur (Yamunanagar District) in climate-smart agriculture. That programme includes key activities such as soil analysis, water management and integrated pest management using biofertilizers, biopesticides and pheromone traps. It also addressed the importance of packaging to comply with the requirements in the recipient country and personal safety measures, including the use of personal protection equipment, first aid kits and adequate systems for agricultural waste disposal.

### \* Basmati producer assistance programme

Tilda has, for the third consecutive year, continued developing its training product with agricultural Basmati producers in the states of Haryana and Uttar Pradesh in India. With a view to helping them meet the Company's strict quality requirements and continue forming part of its supply chain, growers are receiving technical counselling and access to essential inputs and equipment, such as pipes for the application of AWD production techniques, sensors and pheromone traps, etc. This initiative also enables them to lower costs, increase productivity and improve their revenues.

### \* Approved Vendor Program

In 2024, Herba Bangkok started up its Approved Vendor Program, through which it establishes the criteria to be met by all its suppliers, aligned with the Group's Supplier Code of Conduct (COCP) and the regulations of the International Labour Organization (ILO). Through this programme, it is identifying and mitigating key risks for workers in the value chain, such as health and safety at work or regulation of their working hours. In cases where high risks are detected, the subsidiary is implementing additional procedures, such as training in best practices to improve working conditions.

### \* Climate-friendly Rice Production in Thailand

Together with Olam Agri, PepsiCo, Mars and the German agency GIZ, an ambitious project has been set underway to transform the rice sector in Thailand sustainably. This project, scheduled to continue up to 2028, covers 21 provinces and will benefit more than 250,000 growers. Its goals are to:

- reduce CO<sub>2</sub> emissions by an estimated 2.44 million tonnes or more;
- train suppliers in sustainable agricultural practices;
- support income diversification;
- strengthen institutional frameworks and adapt the market to climate-smart agriculture; and
- facilitate access to financing.

### \* Grower training programmes in India

Since 2015, Ebro India has collaborated constantly with the workers in its supply chain, including growers and indirect suppliers. With a team of agricultural experts, it provides training in local communities on best crop practices, such as the use of biological products to reduce the use of chemicals and the benefits of intermittent irrigation (AWD). Training sessions also include discussions about changes in government legislation and labour rights, providing a space to respond to workers' concerns.

### \* **Combat illiteracy in Thailand and Cambodia**

Herba Bangkok and Herba Cambodia have identified illiteracy as a significant risk for the workers in their value chain, as it hampers their understanding of labour laws and regulations. To tackle this challenge, both subsidiaries implemented literacy programmes in 2024 for the most vulnerable groups, facilitating access to key information on labour rights and building up the skills they need to function more securely and knowledgeably in the working environment.

All these programmes have monitoring and follow-up KPIs to assess their impact and measure the progress achieved. One example of this is the Tilda project mentioned earlier, which aims to reach over 7,000 Basmati growers in the Haryana region (India). The initiative began in 2021 with 50 growers, expanding to 699 in 2022 and reaching more than 2,500 between 2023 and 2024. Another prominent case is the monitoring of implementation of the Alternate Wetting and Drying (AWD) technique, which aims to reduce methane emissions by up to 70%. In 2023, this practice achieved a reduction by 36%, raised to 45% in 2024.

Apart from these initiatives, which themselves help to generate material opportunities for the Group, we are also working on others, such as the rewarding of best practices for agricultural suppliers, through the payment of an extra bonus or by giving them priority in contracts, sharing success stories, developing field safety awareness and training actions or reviewing work and rest times. Another initiative to be considered in the future would be to seek alliances with local organisations to improve working conditions in emerging countries.

To conclude this section, it should be noted that no severe Human Rights-related impacts or incidents were recorded in 2024 in the Group's upstream and downstream value chain.



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## S2-5. Targets and management of negative impacts

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\*(41,42)

The main targets defined by the Group for the management of material impacts in value chain workers are included in our Long-Term Sustainability Plan “HEADING FOR 2030”. There was no express engagement with value chain workers to define those targets, but their interests and their personal and professional well-being were taken into account.

Moreover, when developing the projects, the Group shares with those workers the improvements achieved and lessons learned, ensuring fluent communication regarding the results and possible adjustments. Changes are made where necessary and the workers are duly informed to guarantee continuous improvement and effective management of the impacts.



## MDR-T: HEADING FOR 2030 Value Chain Workers

TARGET		TIME HORIZON	VC	METHODOLOGY	ACHIEVEMENTS	EVOLUTION
100% Social audits on Group suppliers	<b>Potential Positive Impact:</b> <ul style="list-style-type: none"> <li>• Protection of children's rights</li> <li>• Prohibition of child labour and forced labour</li> <li>• Action as per Group COCP</li> </ul>	2019 (base year) to 2030 (reference)	Ups Down	Established in the SGP of the Ebro Group, HEADING FOR 2030.	No changes made to this target since the base year (2019).	2019: TBD*
	<b>Potential Negative Impact:</b> * Lack of oversight of compliance in respect of working conditions <ul style="list-style-type: none"> <li>• Mitigation of some breaches of labour rights of workers and their personal and social environments</li> </ul>	No intermediate landmarks defined		Not based on scientific evidence.  No participation of other stakeholders ha contemplated.	Annual supervision through Sustainability Statement, measuring progress against base year, 2019.	2024: TBD*

## MDR-T: HEADING FOR 2030 Value Chain Workers

TARGET		TIME HORIZON	VC	METHODOLOGY	ACHIEVEMENTS	EVOLUTION
100% Accession by Group suppliers to COCP	<b>Potential Negative Impact:</b> Lack of oversight by the Group of compliance in respect of working conditions established in the Group's COCP	2019 (base year) to 2030 (reference)	Ups Down	Established in the SGP of the Ebro Group, HEADING FOR 2030.	No changes made to this target since the base year (2019).	2019: 7%
	<b>Potential Opportunity:</b> Improvement of the Group's reputation as a result of establishing trade relations with ethical selection criteria	No intermediate landmarks defined		Not based on scientific evidence.  No participation of other stakeholders ha contemplated.	Annual supervision through Sustainability Statement, measuring progress against base year, 2019.	2024: TBD*

## MDR-T: HEADING FOR 2030 Value Chain Workers

TARGET		TIME HORIZON	VC	METHODOLOGY	ACHIEVEMENTS	EVOLUTION
100% Group suppliers signed undertaking regarding requirements in the Group's Ethics Questionnaire	<b>Potential Opportunity:</b> Improvement of the Group's reputation as a result of establishing trade relations with ethical selection criteria, improving the performance of work teams in the value chain, contributing towards a more productive and satisfied labour force, with positive impact on the Group's operating performance	2019 (base year) to 2030 (reference)	Ups Down	Established in the SGP of the Ebro Group, HEADING FOR 2030.  Not based on scientific evidence.  No participation of other stakeholders ha contemplated.	No changes made to this target since the base year (2019).  Annual supervision through Sustainability Statement, measuring progress against base year, 2019.	2019: TBD*  2024: TBD*

**KEY: Value Chain (VC)** Ups: Upstream OO: Own Operations Down: Downstream

**Note:** \*TBD: To be determined

# ESRS S3

## AFFECTED COMMUNITIES

List of IROs associated with S3 (SBM-3)

Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT		VC	TIME HORIZON	POLICIES ASSOCIATED WITH THE IRO
AFFECTED COMMUNITIES						
IP-41	Creation of labour, economic and social opportunities in the communities in which the Group has own or commercial operations, through the creation of employment in the society.	I+	R	Ups OO Down		Group Code of Conduct Group Social Policy Sustainability, Environment and Corporate Social Responsibility Policy

**KEY: Impact**  
I+: Positive Impact   I-: Negative Impact   O: Opportunity   R: Risk   P: Potential   A: Actual

**KEY: Value Chain (VC)**  
Ups: Upstream   OO: Own Operations   Down: Downstream

SBM-3. Impacts, risks and opportunities

\*(9a,9c,9d,10,11)

The Ebro Group considers affected communities to be those communities in which we have some kind of presence, whether through direct operations, relations with suppliers and customers or community-support activities. This identification embraces the entire value chain, taking account of the impacts generated by our business activities.

In this regard, 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 (€ THOUSAND)**

	2024	2023
<b>Economic value generated</b>		
Net proceeds from operations	701,527	865,294
Sale of assets and businesses	30,477	15,652
Dividends received from third parties	5,731	1,317
	<b>737,735</b>	<b>882,263</b>
<b>Economic value distributed</b>		
Payments to or on behalf of employees	(356,576)	(332,694)
Corporate income tax	(56,701)	(41,146)
Contribution to not-for-profit entities and support for sustainable agriculture	(8,601)	(6,917)
Interest income/expenses	3,097	(7,368)
Business acquisitions	0	(1,628)
CAPEX	(148,634)	(141,670)
Dividends paid (*)	(124,076)	(97,345)
	<b>(691,491)</b>	<b>(628,768)</b>
<b>Economic value retained</b>	<b>46,244</b>	<b>253,495</b>

(\*) Dividends paid in the corresponding year.

Through its Foundation and subsidiaries, the Group promotes a large number of activities with positive effects on the local, rural and agricultural communities in which we operate, including especially:

- \* **Social projects:** implementation of social welfare and integration initiatives designed to improve the living conditions of vulnerable groups.
- \* **Education and employment programmes:** development of projects related with education and access to employment, providing training and capacity-building of people in the local communities.
- \* **Food donations:** donations of the Group's food products, guaranteeing people's right to food and contributing to food security in segments of the population that are in vulnerable situations.
- \* **Sustainable agriculture:** promotion of programmes developing social and environmental crop standards that foster sustainable agriculture, benefiting growers and rural communities.
- \* **Promotion of healthy eating:** offering society a broad portfolio of healthy products while encouraging healthy eating habits and sport.

Through our Double Materiality Assessment we identified the positive impacts and risks deriving from the Group's business activities in the communities in which we have own operations or trading. The positive impacts include the creation of employment, economic and social opportunities, driven by the generation of employment and the implementation of initiatives that strengthen the local socioeconomic fabric. In addition, investment in social, educational and agricultural programmes helps to improve the communities' well-being and strengthens the bond between the Group and our stakeholders.

One of the potential risks could be a decrease in business continuity and possible damage to the Group's reputation caused by demonstrations in the regions where our production plants, R&D centres and strategic sourcing areas are located. These situations could jeopardise the safety of our employees and facilities and interrupt the value chain. Another important risk identified is a potential legal and reputational impact deriving from breaches of freedom of expression and association in the affected communities. Situations of this nature could lead to economic penalties and damage the Group's image, as well as generating tensions with local communities.

In turn, these risks and opportunities have a differentiated impact on specific groups, such as employees and local suppliers, growers and rural communities, vulnerable groups that participate in integration programmes, students and unemployed workers who participate in educational and employment opportunities and consumers who are offered healthier and more sustainable products.

In order to identify situations that might constitute a risk for communities or groups with special characteristics, such as exposure to precarious working conditions, lack of access to development opportunities or environmental impacts that may affect their quality of life, the Group and its respective subsidiaries have established specific channels to engage with the affected communities and gain an insight into their needs, expectations and potential risks. These mechanisms enable us to collect key information on the impact of the Group's activities on certain groups and in different contexts.

These channels include:

- ✱ **Regular meetings with local communities**, at which we learn and are able to resolve concerns related with the Group's operations.
- ✱ **Engagement with NGOs and social organisations**, which provide information on possible impacts on vulnerable communities.
- ✱ **Suggestion boxes and contact lines in production plants**, to receive alerts or comments regarding impacts on the community.
- ✱ **Joint projects with educational and social undertakings**, which help detect specific training and employment needs.
- ✱ **Participation in forums and sectoral panels** to analyse trends and challenges that impact the communities.





### S3-1. Policies related to affected communities

#### CODE OF CONDUCT OF THE EBRO FOODS GROUP

MDR-P 65(a)	<p><b>Contents:</b></p> <p>The Code of Conduct sets out the principles and values that should inspire the actions of the companies and persons in the Ebro Foods Group and the rules binding on the Professionals in the performance of their duties (point 7).</p> <p>The COC (point 25) addresses the Group's <b>"Relations with society"</b>:</p> <ul style="list-style-type: none"> <li>• The Group operates in several different geographical areas and, as such, contributes towards the creation of local employment, wealth and development in the communities in which it operates.</li> <li>• The Group has an active commitment to social action and works, through the Ebro Foods Foundation, with Non-Governmental Organisations, Foundations and Institutions in the development of numerous programmes, including training and integration of the disabled, helping socially underprivileged groups and promoting agricultural projects in the Third World.</li> </ul> <p>The COC also addresses (point 26) <b>"Sponsorships and Social Action"</b>:</p> <ul style="list-style-type: none"> <li>• The Group's social action is performed through the Ebro Foods Foundation. The Company and the companies of the Ebro Foods Group may engage in social action and sponsorship activities provided they uphold the ethical principles contemplated in this Code.</li> <li>• Social action and sponsorships are assessed and approved by the corresponding corporate body.</li> <li>• Proposals will be assessed considering the alignment of the actions or sponsorships with the principles of the Code. The beneficiaries of the social action and/or sponsorships must accept and undertake the principles of the Code. Where appropriate, the decision-making body may request assessment by the Compliance Unit.</li> <li>• All approved actions or sponsorships will be monitored to check that the activities undertaken or sponsored are performed in conformity with the principles of the Code and, where appropriate, that the funds or products contributed by the Group are used adequately for the specific activity or sponsorship.</li> <li>• The Group will take such measures as may be necessary to ensure that the provisions of this article are also observed in the social actions and sponsorships developed through the Ebro Foods Foundation.</li> </ul>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>The Group COC, as stipulated in point 4, is:</p> <ol style="list-style-type: none"> <li>4.1. Binding on each and all of the Professionals, regardless of their hierarchical level, position and geographical location.</li> <li>4.2. Binding on customers, suppliers, shareholders and other stakeholders with which the Ebro Foods Group interacts in its operations.</li> <li>4.3. Extended to any other persons related with the Group or the Professionals whenever, by virtue of the nature of that relationship, their actions may in any way affect the reputation of the Group or any of its companies.</li> </ol>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b></p> <p>The Audit, Control and Sustainability Committee reports regularly to the Board of Directors of Ebro Foods</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b></p> <p>The COC is available on the Group's corporate website (Código-de-Conducta). Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.</p>

## SUSTAINABILITY, ENVIRONMENT AND CORPORATE SOCIAL RESPONSIBILITY POLICY

<b>MDR-P 65(a)</b>	<p><b>Contents:</b></p> <p>The Group thus undertakes, as an essential principle in its actions, the creation of a business model that is respectful of and sustainable for the environment and society overall and, while ensuring value, profitability and competitiveness, it promotes diversity, respect for human rights, tax responsibility and the prevention of corruption, thus contributing towards the progress of society and generating trust among our stakeholders.</p> <p>Principles of action (point 5) for the affected communities are:</p> <ul style="list-style-type: none"> <li>5.4. With regard to human rights</li> <li>5.5. With regard to the generation of value for the community</li> </ul> <p>In relation to the affected communities in our value chain, the stakeholder being "Our Communities" (point 6.2.), it establishes the following principles and rules:</p> <ul style="list-style-type: none"> <li>• The Group's Social Action Policy develops the criteria for actions in this area, based on the principles of transparency, adaptability and value added.</li> <li>• Actions to be developed directly with Our Community focus mainly on the following areas: <ul style="list-style-type: none"> <li>(i) social action and cooperation to secure development in the most needy or disadvantaged segments of society;</li> <li>(ii) education, vocational training and entrepreneurship;</li> <li>(iii) implementation in society of sustainable and healthy eating habits</li> <li>(iv) creation of environmental value through the implementation and development of sustainable agricultural systems and other specific environmental projects;</li> <li>(v) donations of the Group's food products; and</li> <li>(vi) implementation and development of best practices in our value chain.</li> </ul> </li> <li>• The Ebro Foods Foundation is the main driving force of the Group's social action. Its collaboration is an added contribution towards the well-being of communities, the generation of a lasting positive impact and the transformation and enhancement of the areas where Group companies operate.</li> <li>• This notwithstanding, Group companies may develop their own social action linked to their specific business activities or contributing towards the creation of value in the communities in which they operate.</li> </ul>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b></p> <p>This Policy is applicable to the Company and the Group. The Group companies may also develop their own internal regulations on any subject-matter falling within the scope of this Policy, provided they do not contradict the principles established herein or in other applicable internal Policies or Codes related with this one and lay down more stringent requirements.</p>
<b>MDR-P 65(c)</b>	<p><b>Most senior level accountable for implementation:</b></p> <p>The Board of Directors is responsible for its approval and the Audit, Control and Sustainability Committee for its supervision and implementation</p>
<b>MDR-P 65(d)</b>	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> <li>• Conformity with section 529 ter of the Corporate Enterprises Act ("LSC")</li> </ul>
<b>MDR-P 65(e)</b>	N/A
<b>MDR-P 65(f)</b>	<p><b>Availability:</b></p> <p>This Policy is available on the Group's corporate website (<a href="#">Politica-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a>).</p> <p>Por otro lado, de manera de carácter privado, esta Política también se encuentra en las diversas intranets del Grupo y es de disponibilidad obligatoria para todo proveedor que forman parte de la cadena de suministro del Grupo.</p>

## SOCIAL POLICY OF THE EBRO FOODS GROUP

<b>MDR-P 65(a)</b>	<p><b>Contents:</b></p> <p>Commitment to the social needs and creation of value for local communities is one of the strategic focal points of the Corporate Social Responsibility Policy of the Ebro Foods Group. Accordingly, all social action shall be conducted in accordance with the principles of transparency, adaptability and value added.</p> <p>Social action shall refer mainly to the following areas, without prejudice to any others that may be considered:</p> <ul style="list-style-type: none"> <li>i. assistance and social integration initiatives in the Group's areas of influence;</li> <li>ii. projects related with education and access to employment;</li> <li>iii. donations of food produced by the Group;</li> <li>iv. programmes to develop social and environmental crop standards leading to sustainable farming; and</li> <li>v. promotion of healthy eating, offering consumers a broad range of Group products focusing on the Health segment.</li> </ul>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b></p> <p>This policy is applicable to Ebro Foods, S.A. and the other companies in its Group. The Policy is also extended to the Ebro Foods Foundation (the "Foundation"), through the professionals of the Group who collaborate with it.</p>
<b>MDR-P 65(c)</b>	<p><b>Most senior level accountable for implementation:</b></p> <p>The programmes developed by the Company, the Group and the Foundation in the area of social action are reported annually to or in:</p> <ul style="list-style-type: none"> <li>• Board of Directors</li> <li>• General Meeting of Shareholders of the Company</li> <li>• Group Non-Financial Statement</li> <li>• Website of the Ebro Group Foundation</li> </ul>
<b>MDR-P 65(d)</b>	N/A
<b>MDR-P 65(e)</b>	N/A
<b>MDR-P 65(f)</b>	<p><b>Availability:</b></p> <p>This Policy is available on the Group's corporate website (<a href="#">Política Acción Social</a>).</p> <p>Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/ service provider in the Group's supply chain.</p>

## S3-2. Processes for engaging with affected communities

\*(21,22)

### ENGAGEMENT WITH OUR COMMUNITIES

According to the principles of Sustainability and Social Responsibility of the Group set out in the Sustainability, Environment and Corporate Social Responsibility Policy, the detection and management of actual and potential impacts in the affected communities take account of their needs and expectations. Accordingly, as mentioned earlier, the Ebro Group and its companies have enabled structured communication channels to receive relevant information and guide strategic decisions related to our business activity, design and development of social initiatives and planning of actions to mitigate impacts. In this regard, we engage with affected communities both directly and through legitimate representatives. Depending on the context and the nature of our relationship with each community, we establish spaces for dialogue with social organisations, local associations and other interested parties to gain an insight into their expectations and concerns.

Communities participate in the impact management processes or in the start-up of specific projects in different stages:

- ✱ **Prevention and planning:** identification of possible impacts before commencing new activities or projects.
- ✱ **Execution and follow-up:** monitoring of impacts and continuous dialogue with the communities or their legitimate representatives to detect opportunities for improvement.
- ✱ **Assessment and adjustment:** analysis of results and adoption of corrective measures where necessary, or the implementation of plans to contribute towards social and economic development of the communities.

The frequency of engagement varies according to the context, the type of project developed or to be developed and the specific needs of each community. In general, regular contact points are established through meetings, follow-up reports and sectoral dialogue.

The responsibility for guaranteeing the participation of communities and integration of their views is shared and corresponds to the departments assigned by each subsidiary, which are mostly Marketing and Human Resources, the Corporate Communications, Social Responsibility and Sustainability Department and the Advisory Committee of the Ebro Foundation. The Ebro Group uses different assessment tools to measure the effectiveness of our commitment to communities, such as:

- \* Indicators of social impact in the communities in which we operate, including generation of employment and access to training.
- \* Surveys and opinion polls with local communities and external collaborators.
- \* Analysis of complaints and suggestions received through the open communication channels.
- \* Review of alliances and collaborations with third sector entities to ensure that our social action programmes respond to actual needs.

To make sure we pay sufficient attention to communities that might be more vulnerable to the impacts of our business activities, the Group and its subsidiaries develop specific initiatives to identify and respond to these situations, such as:

- \* Establishing dialogue channels with local authorities.
- \* Development of projects to boost social integration and access to employment for groups at risk of exclusion.
- \* Collaboration with entities specialising in Human Rights and social development that facilitate access to information on vulnerable groups.
- \* Monitoring of environmental and social impacts in areas in which we operate, making sure that the Group's activities do not generate adverse effects on underprivileged communities.

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### S3-4. Taking action to manage IROs

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\*(31,32c,32d,34<sup>a</sup>,38,62)

Much of the social action in the communities in which the Group operates is channelled through the Ebro Foods Foundation and the local subsidiaries, as they have a better idea of the specific needs in their areas. With this structure, we can ensure that our initiatives respond more effectively to the peculiarities of each geographical area and the expectations of local communities, so there are no actions that respond to a global target.

The subsidiaries identify and develop programmes aligned with the Group's global sustainability priorities but adapted to the local situation, while the Ebro Foundation, whether individually, in collaboration with subsidiaries or jointly with other foundations or not-for-profit organisations, promotes strategic social impact projects designed to contribute towards social well-being, inclusion, equal opportunities and minimising the environmental impact in the area. One example of this is the continuous support for training and employability initiatives in vulnerable sectors, such as the Gastronomix project, which celebrated its tenth anniversary in 2024, with presence in Seville and Madrid.

## INITIATIVES AND COMMITMENTS TO THE DEVELOPMENT OF LOCAL COMMUNITIES

In 2024, as in previous years, the Ebro Foundation and Group companies 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 2024 was €8.6 million, compared to €6.9 million in the previous year.

SOCIAL ACTIONS	2024	2023
Food donations subsidiaries	1,252,840.20	1,529,646.26
Ebro Foundation activities	890,084.78	699,907.99
Sustainable Agriculture	6,458,490.00	4,687,526.00
<b>Total amount (€)</b>	<b>8,601,414.98</b>	<b>6,917,080.25</b>

## FOOD DONATIONS

During 2024, Group companies in Spain, UK, Italy, France, India, USA and Canada made food donations for an aggregate value of €1.2 million, delivering 753,771 kg of food. In 2023, 606,742 kg of food was donated, for the value of €1.5 million.

COMPANY	2024		2023	
	AMOUNT (€)	KG	AMOUNT (€)	KG
Herba Ricemills	104,523.52	74,290.54	124,408.31	78,624.00
Tilda Ltda.	16,775.35	67,262.00	48,479.00	58,646.00
Ebro Foods Belgium N.V.	1,643.33	-	-	-
Ebro Foods Netherlands BV	5,874.00	2,584.00	-	-
Herba Bangkok S.L.	38.53	2,000.00	-	-
Pastificio Lucio Garofalo SPA	28,987.72	6,637.00	-	-
S&B Herba Foods Ltd.	209,720.49	54,692.00	-	-
Bertagni	423,793.23	106,578.82	562,713.85	88,751.67
Ebro India Private Ltd.	2,338.88	2,600.00	7,294.00	8,135.00
Lustucru Frais S.A.S.	101,692.00	212,569.00	389,201.00	155,468.00
Riviana Foods Inc.	309,309.10	172,240.15	355,059.10	134,858.06
Riviana Foods Canada	48,144.05	52,318.00	42,491.00	82,260.00
<b>Total amount (€)</b>	<b>1,252,840.20</b>	<b>753,771.51</b>	<b>1,529,646.26</b>	<b>606,742.73</b>

## SOCIAL AND ENVIRONMENTAL INITIATIVES

Apart from the food donations and in our determination to contribute to sustainable development of the communities in which we operate, the Ebro Group and the Foundation continued working in 2024 to set up different social and environmental initiatives.

The Foundation worked in three major areas during 2024:

- ✱ **Food and health:** This includes aid given to neighbourhood associations, soup kitchens, fraternities and sororities, humanitarian disasters, etc., as well as participation in projects that encourage healthy lifestyles through food and sport.

The total contributions made in this area in 2024 was €133,116.37. In 2023 a sum of €141,218.09 was contributed.

- \* **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 2024 was €496,968.41, compared to €498,689.90 in the previous year.

- \* **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 the Long-Term Sustainability Plan "HEADING FOR 2030". In 2024 the Foundation invested €60,000 in these awards, the same amount as in the previous year.

In addition, different Group companies invested €6,458,490 million (€4,687,526 in 2023) in the launching of sustainable agriculture programmes in our principal sourcing areas, and the payment of a premium fee to growers with a view to improving not only their agricultural yields but also their revenues.

Outside these three areas, special action was taken following the damage caused in Valencia by the COL (cut-off low). This action consisted of an outright grant of €200,000 for the Group employees of the Algemés and Silla plants that were damaged in this tragedy.

To conclude this chapter, it should be mentioned that the Ebro Group did not receive any complaints or claims regarding possible adverse impacts on the local communities in which we operate in 2024 or 2023.

## ACTIONS AND RESOURCES TO MONITOR AND MITIGATE RISKS

The undertaking by the Ebro Group to manage material impacts in communities entails the allocation of specific human financial and operational resources. Through the Ebro Foundation and other corporate initiatives, funds are allocated to projects acting on social development, education, equal opportunities, capacity building, impact minimisation and sustainability. The planning and implementation of these actions is coordinated by the Foundation, the sustainability areas and other relevant departments in the different subsidiaries, ensuring correct implementation and alignment with the Company's values and goals.

To minimise any risks associated with interactions with the affected communities, the Group and its subsidiaries implement preventive and mitigation measures focused on dialogue, respect for Human Rights and proactive conflict management. The principal initiatives include:

- \* **Strengthening dialogue and consultation with the communities:** put in place mechanisms for engagement with the affected communities to understand their concerns and avoid possible conflicts that could lead to demonstrations or social unrest.
- \* **Local development and social responsibility programmes:** develop initiatives that enhance the well-being of the communities in which the Group operates, promoting employment opportunities, access to education and improvements to local infrastructure. These actions reduce the perception of negative impacts and boost the Group's social acceptance.



- \* Regulatory compliance and commitment to Human Rights: adopt policies aligned with international standards to guarantee respect for communities' freedom of expression and association, avoiding legal penalties and protecting the Group's reputation.
- \* Tracking and assessment of risks: through regular analysis of social and operational risks, internal audits and reviewing of key indicators, the Group assesses the effectiveness of our mitigation measures, identifying opportunities for improvement and ensuring the fulfilment of our commitments.

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### S3-5. Targets related to managing material negative impacts

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\*(81)

Although the Ebro Group has not set global quantifiable targets related to managing impacts in affected communities, our approach is based on flexibility and adaptation to the specific real situations in each context. The communities with which we interact have diverse needs, so the initiatives developed by the Group are designed with tailored metrics to enable precise, meaningful tracking of effectiveness in each case.

Through the Ebro Foundations and other corporate actions developed by the parent or our subsidiaries, projects are implemented with specific, measurable targets in areas such as social well-being, social and labour market inclusion, education, entrepreneurship and environmental sustainability. However, consolidating a single global quantifiable target might not adequately reflect the diverse nature of the impacts and needs of communities in the different regions in which we operate.

Consequently, the involvement of the affected communities is key in designing projects with their corresponding targets, tracking and improvement. They participate in several ways:

- \* Setting targets: the affected communities participate actively through direct consultations, roundtable discussions, structured listening processes and third sector entities. In many cases, local representatives, neighbourhood associations and other stakeholders collaborate in defining the targets of the different projects, ensuring that the initiatives respond to their expectations and aspirations.
- \* Tracking of achievement of targets: the communities track the development of the initiatives through regular meetings with those responsible for the projects and other open communication channels, through which they can engage directly with the Group or the subsidiary in question. Through their involvement we are able to assess the degree of progress, detect difficulties and propose adjustments in execution of the projects to make sure the defined targets are effectively met.
- \* Identification of improvements and lessons learned: through community meetings, opinion polls, NGOs and focus groups, the members of the communities express their view of the results obtained and may suggest improvements for future actions and express their learnings and experience, which helps us to redefine strategies and boost the impact of initiatives according to their assessments.

The Group does not plan to set Group-level quantitative targets within a given time horizon.

## ESRS S4

### CONSUMERS AND END-USERS

#### List of IROs associated with S4 (SBM-3)

##### Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH THE IRO
CUSTOMER SATISFACTION					
IP-49	Product supply security for customers thanks to the Group's diversification to procure raw materials in sourcing areas that can cope with raw material shortages or other sourcing problems that might be encountered by suppliers.	I+	A	Ups OO Down	Group Code of Conduct
O-44	Business expansion to new customers and markets, driving a growth in turnover, focusing on business lines with high potential such as microwave rice in the United States and Spain. Improvements are also being made in packaging productivity and alternative supply sources are being explored with a view to optimising operation and taking advantage of new opportunities.	O	P	OO Down	Short term Group Code of Conduct
R-40	Higher costs incurred in researching new consumer and/or customer needs and implementing measures to meet their requirements for improved product quality.	R	A	OO Down	Medium term Group Code of Conduct
FOOD SAFETY AND QUALITY					
IP-51	Enhanced consumer safety due to rigorous health and safety standards in products and the promotion of food safety programmes.	I+	A	OO Down	Group Code of Conduct Supplier Code of Conduct Social Policy of the Ebro Group Sustainability, Environmental and Corporate Social Responsibility Policy
O-46	Increased capitalisation of internalisation processes, ensuring that the essential safety aspects are incorporated in the development of new products at the industrial plants and R&D centres. This raises safety standards, strengthens the Group's commitment to quality and guarantees regulatory compliance on a global level, promoting safe, efficient operation.	O	P	OO Down	Short term Group Code of Conduct

##### KEY: Impact

I+: Positive Impact   I-: Negative Impact   O: Opportunity   R: Risk   P: Potential   A: Actual

##### KEY: Value Chain (VC)

Ups: Upstream   OO: Own Operations   Down: Downstream



## Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH THE IRO
<b>FOOD SAFETY AND QUALITY</b>					
R-43	Greater requirements due to changes in the European regulation of quality and safety standards, which entail increased sustainability reporting. Breach of or failure to adapt to these regulations could result in regulatory fines and a loss of credibility and confidence among consumers and other stakeholders.	R	A	Ups OO Down	Short term Group Code of Conduct
<b>PRODUCT AND BRAND DEVELOPMENT</b>					
R-41	Loss of customers due to higher prices of end products, attributable to the fluctuations in availability and costs of the agricultural inputs, affected by climate, geopolitical and economic factors.	R	A	OO	Short term Group Code of Conduct

### KEY: Impact

I+: Positive Impact I-: Negative Impact O: Opportunity R: Risk P: Potential A: Actual

### KEY: Value Chain (VC)

Ups: Upstream OO: Own Operations Down: Downstream

## SBM-3. Impacts, risks and opportunities

\*(10,11,12)

The customers and consumers of the Ebro Group are grouped into four major categories, all upstream in our value chain:

1. Food retail and wholesale distribution
2. Multinationals in the food sector
3. Hospitality businesses
4. End-consumers

Given the universal nature of our business activity, food, all of our customers and consumers, without exception, are subject to the material IRPs identified by the Group in our Double Materiality Assessment. In this regard, it should be noted that all the products manufactured by the Ebro Group are intended for the whole of society and do not adversely affect any specific group of end-customers and consumers.

The relationship between the IROs and each of these groups varies according to the type of group:

### 1. Food retail and wholesale distribution

- ✳ **Positive impacts:** security of supply, as diversification in the sourcing of raw materials and production capacity reduce the risk of supply shortages.
- ✳ **Risks:** they may be affected by increased prices owing to volatility in the costs of agricultural inputs, logistics, etc.
- ✳ **Opportunities:** the Group's expansion into new markets and innovative products helps to strengthen our portfolio and make us more competitive.

## 2. Multinationals in the food sector

- \* **Positive impacts:** the food safety and quality guaranteed by the Group boosts confidence in our products and enables us to comply with international standards.
- \* **Risks:** changes in European regulation may affect quality and safety requirements, requiring increased compliance and more detailed reporting.
- \* **Opportunities:** the capitalisation of internationalisation and integration of safety criteria in R&D favour strategic alliances and joint growth.

## 3. Hospitality businesses

- \* **Positive impacts:** stability in the supply and quality of products allow them to provide a reliable service and maintain customer trust.
- \* **Risks:** increased costs deriving from the adaptation to new consumer trends and demands.
- \* **Opportunities:** optimising production processes and new business lines can improve the supply available for this segment.

## 4. End-consumers

- \* **Positive impacts:** safer, healthier products, thanks to the strict food safety and quality standards implemented by the Group.
- \* **Risks:** price rises in end products may affect accessibility and perception of the brand.
- \* **Opportunities:** innovation in differentiated products adapted to their needs improves customer loyalty and expands the potential market.

None of the impacts identified in the Double Materiality Assessment is negative.

In respect of risks and opportunities deriving from dependencies, the Double Materiality Assessment did not identify any opportunities and the risks defined are related with the possibility of legal penalties or waning customer confidence, due to either possible cyber attacks or failure to comply with privacy regulations that might jeopardise the security of data stored in our systems. We also identified a possible failure to respond to consumer concerns or the provision of incomplete or inaccurate information in product labels. The Group responds fully to all these risks through the Cybersecurity Protocols established, strict compliance with the Data Protection Act, effective implementation of communication channels with our customers and consumers and compliance with the national laws in place in each country in respect of labelling.



## GROUP STRATEGIES TO MAXIMISE OUR POSITIVE IMPACT

### Diversification of our supply chain

The availability of raw materials in the necessary quantity and quality is a key factor for guaranteeing that we are able to meet our commitments to customers and satisfy the quality criteria of the Group's brands. Our strategy for diversification and securing supply is based on three pillars:

- i. Strategic agreements with some of our principal rice and durum wheat suppliers, guaranteeing supplies for each campaign.
- ii. International presence in the principal rice exporting countries through the opening of subsidiaries and representative office (India, Pakistan, Thailand and Cambodia) and in contracyclical markets such as Argentina.
- iii. Optimisation of our logistics chain, ensuring that the product meets all quality requirements and enabling us to provide an efficient, reliable service.

Thanks to this strategy, the Ebro Group has significant competitive advantages that boost our ability to respond to our customers and consumers when faced with possible challenges in sourcing, thereby minimising the impact of possible shortages or logistics problems in the supply chain.

### Food Safety and Quality

This commitment is embodied within a strict regulatory framework in the countries in which the Group produces and sells its products. The Health and Safety Policy is based on two fundamental pillars: rigorous compliance with the laws in place and adherence to the highest food safety and quality standards.

In this context, the Group has implemented the following Food Safety and Quality Control Systems:

- i. **Good Manufacturing Practices (GMP):** contemplating best practices for the handling, packaging, storage and carriage of fresh products.
- ii. **Hazard Analysis and Critical Control Point (HACCP):** a system to identify and control critical points in production, making sure that the residual risk is minimal. These controls are divided into three key categories:
  - \* Physical hazards: detection of foreign bodies in the product, including metals.
  - \* Chemical hazards: identification of chemical substances or the presence of allergens.
  - \* Biological hazards: control of microorganisms such as salmonella and other pathogens.
- 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 standard FSSC22000, which provides a reference framework for the food safety requirements, incorporating best practices in the agricultural, manufacturing and distribution systems for HACCP.

Through the implementation of all these Standards and Control System, the Group is able to guarantee integral management of food quality and safety, from the origin of the raw materials to final delivery to customers and consumers.

## R&D+I

This is the instrument that differentiates the Group from our competitors and enables us to develop unique products and technologies with which we can meet the needs of our customers and consumers, offering them a broad range of differentiated value-added products.

In this context, the Group has built its R&D+I structure around several research centres we have in France, United States, Netherlands, Italy and Spain. These centres and the principal projects they were working on during 2024 are:

1. **Lyon (France).** This centre focuses its research on the development of fresh pasta, gnocchi, rice, pulses and other grains. This year it expanded its work on: (i) patented technologies for pan-cooked gnocchi, (ii) improvements in the productivity and production processes of fresh pasta, (iii) additions to the product range of microwave and pan-cooked products and (iv) renovation of the range of filled fresh pasta products.
2. **Arcugnano (Italy).** This centre has continued its work on: (i) extending the range built on the double-filling technology patented by Bertagni, (ii) developing new dosing processes and (iii) improving productivity and control in key processes.
3. **United States.** Centre focusing on the development of new products, processes and technologies, and adapting them to the peculiarities of the US market. It has been working on: (i) a broad range of microwave products, (ii) the development and adaptation of thermal processes, (iii) studies on the shelf-life and expiry of products and (iv) testing of products and evaluation of rice varieties adapted to new production processes.
4. **Bruno (Italy).** R&D centre engaged in creating new products based on cereals and pulses.
5. **Moncada (Valencia, Spain).** This centre researches new and/or improved processes, methods and technologies in rice.
6. **San José de la Rinconada (Seville, Spain).** This centre works on two main lines: (i) technical assistance in aspects of technology for rice varieties and other cereals and (ii) development of ready-to-serve meals based on rice, pasta and pulses.
7. **Wormer (Netherlands).** This centre develops cereal- and pulse-based ingredients.

## Constant interaction with customers and consumers

The Group companies communicate constantly with their customers and consumers, either through multiple active listening platforms, such as telephone, social networks, electronic mailboxes, customer services or through satisfaction surveys to gauge their interests or opinions. The purpose of all these communications is to provide timely, adequate, transparent responses and deal with consultations and any possible incidents appropriately.



## S4-1. Policies related to consumers and end-users

\*(15,16,17)

CODE OF CONDUCT OF THE EBRO FOODS GROUP	
MDR-P 65(a)	<p><b>Contents:</b> Sets out the principles and values that should inspire the actions of the companies and persons in the Ebro Foods Group and the rules binding on the Professionals in the performance of their duties (listed in point 7).</p> <p>In point 22, the COC contemplates "<b>Relations with Customers and Consumers</b>":</p> <ul style="list-style-type: none"> <li>22.1. The Group undertakes to offer top quality services and products according to the quality requirements and standards established in law and its food safety and quality policy.</li> <li>22.2. The Group shall strive to achieve maximum transparency in all information exchanged with consumers and customers in order to maintain a high degree of trust.</li> <li>22.3. The Group shall guarantee the confidentiality of its customers' particulars, undertaking not to disclose them to third parties except in accordance with prevailing laws or in compliance with rules or court or administrative orders. Customers' personal data shall be obtained, used and processed in such a way as to guarantee compliance with the personal data protection laws in place from time to time.</li> <li>22.4. Any Professionals who, by virtue of their job, have access to customer data, shall keep those data confidential and comply with all applicable laws on personal data protection.</li> </ul> <p>In point 23, the COC contemplates "<b>Relations with rivals</b>":</p> <ul style="list-style-type: none"> <li>23.1. The Group undertakes to compete fairly on the markets in which it operates, encouraging free competition, complying with the laws in place and avoiding any abusive conduct or restrictive practices.</li> <li>23.2. The Group prohibits any actions entailing unfair competition and undertakes to ensure compliance with the fair trading laws applicable in the countries in which it operates.</li> <li>23.3. The Professionals shall abstain from any unlawful use of the creations, work, distinguishing marks or, in general, the intellectual and industrial property rights of rivals and third parties.</li> </ul>
MDR-P 65(b)	<p><b>Scope:</b> The Group COC, as stipulated in point 4, is:</p> <ul style="list-style-type: none"> <li>4.1. Binding on each and all of the Professionals, regardless of their hierarchical level, position and geographical location.</li> <li>4.2. Binding on customers, suppliers, shareholders and other stakeholders with which the Ebro Foods Group interacts in its operations.</li> <li>4.3. Extended to any other persons related with the Group or the Professionals whenever, by virtue of the nature of that relationship, their actions may in any way affect the reputation of the Group or any of its companies</li> </ul>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b> The Audit, Control and Sustainability Committee reports regularly to the Board of Directors of Ebro Foods</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b> The COC is available on the Group's corporate website (<a href="#">Código-de-Conducta</a>). Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.</p>

## SUSTAINABILITY, ENVIRONMENT AND CORPORATE SOCIAL RESPONSIBILITY POLICY OF THE EBRO GROUP

MDR-P 65(a)	<p><b>Contents:</b></p> <p>The Group thus undertakes, as an essential principle in its actions, the creation of a business model that is respectful of and sustainable for the environment and society overall and, while ensuring value, profitability and competitiveness, it promotes diversity, respect for human rights, tax responsibility and the prevention of corruption, thus contributing towards the progress of society and generating trust among our stakeholders.</p> <p>With regard to our customers and consumers, the stakeholder being “Our Public” (point 6.3), this Policy establishes the following</p> <ul style="list-style-type: none"> <li>• The Code of Conduct sets out the basic rules and principles governing the relationships of the Group and its professionals with consumers and customers.</li> <li>• Relationships with our public are based on the promotion of healthy eating, offering customers and consumers a broad selection of Group health-focused products.</li> <li>• Actions in this area focus on the following:             <ul style="list-style-type: none"> <li>(i) Development of a portfolio of products designed to enhance consumers’ well-being and health;</li> <li>(ii) Promotion of healthy eating habits;</li> <li>(iii) Implementation of standards that guarantee the quality and safety of food products for our consumers and customers.</li> </ul> </li> <li>• The Group undertakes to offer high quality services and products that comply not only with the requirements and quality standards stipulated in law, but also with other more stringent standards that guarantee the highest quality.</li> <li>• We seek maximum transparency in the information we provide for customers and consumers."</li> </ul>
	<p>This Policy is supplemented and developed by the other Policies and internal regulations of the Ebro Group, particularly the Group's Code of Conduct, Supplier Code of Conduct and the Policies on Social Action; Communication of Financial, Non-Financial and Corporate Information; Communication and Relations with Shareholders, Institutional Investors and Proxy Advisors; Risk Control and Management; and Corruption and Bribery.</p>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>This Policy is applicable to the Company and the Group. The Group companies may also develop their own internal regulations on any subject-matter falling within the scope of this Policy, provided they do not contradict the principles established herein or in other applicable internal Policies or Codes related with this one and lay down more stringent requirements.</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b></p> <p>The Board of Directors is responsible for its approval and the Audit, Control and Sustainability Committee for its supervision and implementation</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> <li>• Conformity with section 529 ter of the Corporate Enterprises Act (“LSC”)</li> </ul>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b></p> <p>This Policy is available on the Group's corporate website (<a href="#">Politica-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a>)</p> <p>Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.</p>

## SOCIAL POLICY OF THE EBRO FOODS GROUP

MDR-P 65(a)	<p><b>Contents:</b> Commitment to the social needs and creation of value for local communities is one of the strategic focal points of the Corporate Social Responsibility Policy of the Ebro Foods Group. Accordingly, all social action shall be conducted in accordance with the principles of transparency, adaptability and value added.</p> <p>Social action shall refer mainly to the following areas, without prejudice to any others that may be considered:</p> <ul style="list-style-type: none"> <li>i. assistance and social integration initiatives in the Group's areas of influence;</li> <li>ii. projects related with education and access to employment;</li> <li>iii. donations of food produced by the Group;</li> <li>iv. programmes to develop social and environmental crop standards leading to sustainable farming; and</li> <li>v. promotion of healthy eating, offering consumers a broad range of Group products focusing on the Health segment.</li> </ul>
MDR-P 65(b)	<p><b>Scope:</b> This policy is applicable to Ebro Foods, S.A. and the other companies in its Group. The Policy is also extended to the Ebro Foods Foundation (the "Foundation"), through the professionals of the Group who collaborate with it.</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b> The programmes developed by the Company, the Group and the Foundation in the area of social action are reported annually to or in:</p> <ul style="list-style-type: none"> <li>• Board of Directors</li> <li>• General Meeting of Shareholders of the Company</li> <li>• Group Non-Financial Statement</li> <li>• Website of the Ebro Group Foundation</li> </ul>
MDR-P 65(d)	N/A
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b> This Policy is available on the Group's corporate website (<a href="#">Política Acción Social</a>). Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.</p>

## SUPPLIER CODE OF CONDUCT OF THE EBRO FOODS GROUP

MDR-P 65(a)	<p><b>Contents:</b> The Supplier Code of Conduct (COCP), developed as supplementary to the Group's Code of Conduct, mentions the same commitments (point 3: Rules and Principles) and establishes the guidelines to be followed by all Suppliers who contract with the Group, especially those operating in countries rated as high risk by the International Labour Organisation.</p> <p>With regard to customers and consumers, the COCP addresses the following topics:</p> <p><b>3.9 Health and safety:</b></p> <ul style="list-style-type: none"> <li>• Suppliers shall comply with local laws on health and safety and the relevant requirements established by the International Labour Organisation.</li> </ul> <p><b>3.11 Product safety and quality:</b></p> <ul style="list-style-type: none"> <li>• Suppliers shall ensure that all the products supplied to Group companies comply with the applicable food safety and quality laws and standards.</li> <li>• Suppliers shall inform the Group immediately of any comments they may have regarding product safety.</li> </ul>
MDR-P 65(b)	<p><b>Scope:</b> This Code is applicable to all the Suppliers of companies in the Ebro Foods Group, without prejudice to any specific provisions that may be applicable in accordance with the local laws, customs and practice in different jurisdictions.</p> <p>This Code is also applicable to the Group companies and professionals (i.e. directors, executives and employees), who must foster compliance with the Code by the Suppliers they deal with.</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b> The Group reserves the right to supervise and check compliance by its Suppliers of the rules and principles laid down in this Code.</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> </ul>
MDR-P 65(e)	N/A

SUPPLIER CODE OF CONDUCT OF THE EBRO FOODS GROUP

MDR-P 65(f)	<p><b>Availability:</b></p> <p>The COCP is available on the Group's corporate website (<a href="https://www.ebrofoods.es/wp-content/uploads/2023/07/Supplier-conduct-code.pdf">https://www.ebrofoods.es/wp-content/uploads/2023/07/Supplier-conduct-code.pdf</a> ).</p> <p>Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.</p>
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COMMITMENTS TO RESPECTING OUR CUSTOMERS’ AND CONSUMERS’ HUMAN RIGHTS

As stipulated in our Code of Conduct, the Ebro Group undertakes to ensure that our operations respect Human Rights at all stages of the value chain. This commitment includes protection of the rights of consumers and end-users, ensuring that their products and trading practices do not violate those rights. The Code of Conduct establishes clear guidelines to avoid any form of abuse or violation of fundamental rights in accordance with internal laws and practice. In particular, article 9.7 acknowledges that those rights are fundamental and universal, aligned with the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. These references guide the Group's actions and policies to guarantee respect and promotion of Human Rights in all our operations.

The Group extends this undertaking to guarantee top quality and safety of our products and transparency of the information provided. Article 22.1 of the Code of Conduct provides that the Group's products and services must meet the quality standards required by law and our internal food safety and quality policies, which directly means we guarantee the right to health of all the customers and consumers of our products.

The Group also promotes clear, honest communication with our consumers. According to article 22.2 of the Code of Conduct, we seek maximum transparency in all information exchanged with consumers and customers in order to maintain a high degree of trust in the Group and our products, and with regard to data protection, strict measures are taken to guarantee the confidentiality of all our customers' information. Articles 22.3 and 22.4 of the Code of Conduct stipulate that personal data will only be used in accordance with the applicable laws and that any Group professionals who have access to customer data are obliged to respect their confidentiality and comply with all data protection laws, thereby upholding the right to privacy of anyone who interacts directly with the Group.

There were no breaches or complaints in 2024 related to the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises involving consumers and/or end-users.

COMMUNICATION WITH CUSTOMERS AND CONSUMERS

The Group, through all our subsidiaries, maintains open, transparent communication with our consumers and end-users. For this purpose, the Group has established effective communication channels to receive and respond to consultations, suggestions and complaints, enabling us to adapt to the needs and expectations of this group.

- \* Corporate websites of the different subsidiaries
- \* Customer services
- \* Electronic mailboxes in each of the Group companies
- \* Communication mailbox of the parent ([comunicacion@ebrofoods.es](mailto:comunicacion@ebrofoods.es))
- \* Advertising and Marketing
- \* Satisfaction surveys
- \* One-to-one meetings and regular visits
- \* Social networks
- \* Blogs (corporate and brand)
- \* Trade fairs, forums and conferences
- \* Annual Report
- \* Whistleblowing channel of the Code of Conduct



### 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 for contact.

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
Ebro Foods Belgium	Belgium	E-mail, website and social media
Ebro Foods Netherlands	Netherlands	Telephone, e-mail, website and social media
Ebro India	India	Telephone, e-mail and post
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, email and website
Risella	Finland	Telephone
Riviana Foods Canada	Canada	Telephone, e-mail, website and social media
Riviana Foods	USA	Telephone, e-mail, Website and social media
Tilda	UK	Telephone, e-mail, post and social media

## S4-2. Engagement with customers and consumers

\*(20)

### RELATIONS WITH CONSUMERS: DIALOGUE, TRANSPARENCY AND CONTINUOUS IMPROVEMENT

The Ebro Group, and more specifically the subsidiaries that perform the business, actively incorporate the views of consumers and end-users in the management of our actual and potential impacts. For this purpose we have mechanisms for listening to and analysing feedback, including market surveys, satisfaction surveys and monitoring of consumer trends. This information is integrated in strategic decision-making, especially in the areas of product development (R&D+I), Quality, Marketing and Trading.

The Group engages directly with our consumers and end-users through the channels mentioned earlier in S2-4 and they participate in different stages of the product lifecycle:

- \* Research and development: Through market surveys and trend analyses, the Group identifies new innovation opportunities aligned with consumer preferences and needs.
- \* Production and quality: Suggestions and claims are received in real time through customer services channels, enabling us to make adjustments to the formulation or presentation of products.
- \* After-sales services and continuous improvement: Consumers' comments and valuations are analysed and influence future decisions on reformulation, labelling and development of products.

The frequency of engagement varies according to the channel and purpose, with constant monitoring on digital platforms and regular satisfaction surveys.

The operational responsibility of guaranteeing the participation of consumers and end-users generally corresponds to the Departments of Quality, Trading and Marketing. These areas are responsible for implementing active listening systems, analysing the results obtained and reporting their conclusions to the Management Committees for inclusion in the Group's or subsidiary's strategy.

The effectiveness of this engagement is assessed through:

- \* Customer satisfaction indicators obtained in surveys and analysis of comments in social networks and other channels.
- \* Brand loyalty and repeat purchase rates, which reflect the level of acceptance of the products.
- \* Review of claims and consultations, with response and resolution time metrics.
- \* Monitoring of compliance with quality standards and transparency in the information provided for consumers.

Although the Group's products are targeted at the general public, we recognise the importance of considering the needs of consumers with specific needs and, in this respect, the Group takes several measures, such as developing adapted products, including gluten-free and organic options or products enriched with essential nutrients, and running nutritional education campaigns in collaboration with NGOs and private entities to encourage healthy eating habits in populations at greater risk of exclusion.

### MANAGEMENT OF CLAIMS AND QUALITY SYSTEMS

The different Quality Departments carry out exhaustive tracking of all claims received, making detailed analyses thereof. The corresponding quality system is also checked to identify any possible incidents. If an irregularity is detected, the necessary mechanisms are triggered immediately to solve them, thus ensuring compliance with the applicable standards.

The following table shows the number of claims handled in 2024, by company, for packaging defects, sensory properties, etc.:

COMPANY	NO. INCIDENTS
Arrozeiras Mundiarroz, S.A.	81
Bertagni 1882, S.P.A.	305
Ebro Foods Belgium, N.V.	464
Ebro Foods Netherlands BV	438
Ebro India, Private Ltd.	46
Euryza, Gmbh	603
Garofalo France, S.A.S.	44
Herba Ricemills, S.L.U.	288
Indo European Foods Ltd.	184
Lustucru Frais, S.A.S.	1,099
Lustucru Riz, S.A.S.	1,409
Pastificio Lucio Garofalo, Spa	1,556
Riceland Magyarorzag, Kft	38
Riviana Foods Canada Corporation	1,820
Riviana Foods, Inc.	12,246
S&B Herba Foods, Ltd.	246
Santa Rita Harinas, S.L.U.	13
Tilda, Ltd.	1,414

Claims received in 2023:

COMPANY	NO. INCIDENTS
Arrozeiras Mundiarroz, S.A.	157
Bertagni 1882, S.P.A.	329
Ebro Foods Belgium, N.V.	277
Ebro Foods Netherlands BV	482
Ebro India, Private Ltd.	40
Euryza, Gmbh	886
Herba Ricemills, S.L.U.	237
Lustucru Frais, S.A.S.	1,248
Lustucru Riz, S.A.S.	1,914
Pastificio Lucio Garofalo, Spa	1,004
Riceland Magyarorzag, Kft	45
Risella	129
Riviana Foods, Inc.	13,466
Riviana Foods Canada Corporation	1,968
Tilda, Ltd.	1,252

## S4-4. Taking action to manage IROs

\*(62,31c,31d,33a,33b,35,37)

The Group takes several initiatives in the management of key IROs such as food safety and quality, product innovation, communication with consumers, cybersecurity, security of supply, etc., securing our commitment to offer safe products and guarantee our customers a reliable service. The Group's decentralised model means that these initiatives are implemented on a local level.

### GENERATION OF POSITIVE IMPACTS FOR CONSUMERS AND END-USERS

The Ebro Group and its companies have implemented several initiatives and processes designed to generate positive impacts for consumers and end-users, with a clear focus on safety, quality, health, sustainability and innovation.

#### 1. Security of Supply and Continuity of Supply

The Group has put in place key initiatives to strengthen the security of supply of our products, guaranteeing continuity of supply even in scenarios of raw material shortages or disruptions in the supply chain.

Different measures have been taken in this regard, such as:

- ✱ Strategic diversification of sourcing areas, selecting regions that are able to cope with possible interruptions.
- ✱ Reinforcement of trust relations with key suppliers, guaranteeing quality and stability in the value chain.
- ✱ Risk management systems that enable us to anticipate possible contingencies and minimise impacts on production and distribution.

#### 2. Commitment to Food Safety and Quality

The Group upholds strict safety and quality standards in all its production processes, implementing control systems that ensure that the Group's products comply with the highest safety and quality standards, thereby generating trust among consumers. These standards include: Good Manufacturing Practices (GMP) and the Hazard Analysis and Critical Control Points (HACCP) model, international certifications and regular product assessments to guarantee continuous improvement and see that stringent standards are met.

#### 3. Innovation and development of products for consumer well-being

The Group invests constantly in R&D and innovation through our seven R&D centres. Some of their lines of work comprise:

- ✱ Development of healthy, innovative products adapted to new consumer trends.
- ✱ Research into new production technologies, optimising efficiency and sustainability.
- ✱ Expansion of our offer with products that are easy to prepare, with innovative formats such as microwave cups or doypacks.

#### 4. Promotion of healthy eating

As part of our commitment to consumer health and well-being, the Group develops and participates in healthy eating programmes, promoting adequate nutritional habits and providing clear, transparent information on our products.

## TRACKING AND ASSESSMENT MECHANISMS

The companies in the Ebro Group use different tools and processes to rigorously track the effectiveness of our actions related to consumers and end-users. These mechanisms enable us to measure the actual impact of initiatives and make sure they are aligned with consumer expectations and needs.

### 1. Food safety and quality indicators

- \* Regular internal and external audits to check compliance with the highest safety and quality standards.
- \* Quality control at all stages of production, especially in respect of traceability and food safety.

### 2. Consumer satisfaction assessment

- \* Market surveys and satisfaction surveys targeting consumers and end-users.
- \* Monitoring of consumer trends to adapt and improve our products.
- \* Assessment of complaints and claims with protocols established for efficient resolution.

### 3. Communication and active listening channels

- \* Multichannel customer services to receive and manage comments and suggestions.
- \* Presence in social networks to engage directly with consumers and discover their concerns.
- \* Implementation of initiatives focusing on transparency in product labelling and communication.

### 4. Regulatory compliance and adaptation

- \* Tracking the evolution of national and international laws and regulations.
- \* Adaptation to regulatory changes regarding information to consumers and food safety.

## MITIGATION OF RISKS AND CAPITALISATION OF OPPORTUNITIES

As indicated earlier, the risks defined are related with the possibility of legal penalties or waning customer confidence, due to either possible cyber attacks or failure to comply with privacy regulations. Another risk is related with the loss of consumer trust due to a possible failure to respond to their concerns or to providing incomplete or inaccurate information in product labels. The Group and its companies have established different mitigation actions in this regard:

### Risk of cyber attacks or breaches of data protection laws

- \* Cybersecurity protocols: implementation of advanced computer security systems, including firewalls, data encryption and proactive threat detection.
- \* Regular audits: internal and external security audits to identify vulnerabilities and improve data protection.
- \* Staff training: continuous training for employees on secure data management and prevention of cyber attacks (phishing, malware, etc.).
- \* Incident response plan: strategy defined to act swiftly in the event of possible security breaches, minimising their impact.

### Risk of loss of consumer trust owing to failure to respond to their concerns

- \* Efficient communication channels: strengthening of consumer contact points (customer services, social networks, surveys, etc.).
- \* Monitoring of claims.
- \* Analysis of trends and expectations: use of active listening tools, such as telephone or point-of-sale surveys and focus groups to anticipate consumer concern.

### Risk of inaccurate or incomplete information in product labels

- \* Strict compliance with labelling regulations: permanent review and updating of labelling pursuant to the regulations in place in each country.
- \* Quality control in nutritional information: validation of information provided on packaging, with regular audits.
- \* Transparency and education of consumers: development of initiatives through online communication channels to explain clearly the composition and benefits of products, guaranteeing comprehensible, accessible communication.

As for maximising material opportunities, some of them arise as the reverse of previously assessed risks. In this regard, key actions such as implementing cybersecurity and privacy policies, improving the management of incidents and customer services, and providing clear, transparent information on products not only mitigate potential risks, but also strengthen consumer trust, improve our reputation and consolidate customer loyalty.

Other strategic initiatives to maximise these opportunities are:

- \* Drive innovation as a key differentiating factor, ensuring that emerging trends are addressed in order to respond proactively to market developments and avoid risks associated with changes in demand or negative perceptions of consumers. The Group has an extra edge in this aspect in our broad geographical diversification, thanks to which we can find out in advance about the needs and products arising in some markets and extrapolate them early to others.
- \* Expand business to new customers and markets, focusing on new countries and new forms of distribution, such as e-commerce.
- \* Develop value added strategies to diversify supply and mitigate possible falls in demand for traditional products.
- \* Guarantee high standards of product quality and traceability through quality assurance standards and certifications. Apart from preventing risks associated with errors in labelling or nutritional information, this measure provides added value for consumers who prioritise safety and transparency in their purchasing decisions.
- \* Incorporate sustainability attributes in the product and marketing strategy, boosting the Group's value proposal in line with the growing demand for responsible products. Effective communication attracts a segment of consumers who are more aware and engaged.
- \* Develop education and awareness campaigns, encouraging consumers to reduce food waste and adopt sustainable practices.

In this context, the Group and its companies allocate human, financial and technological resources to guarantee efficient management of the material impacts deriving from our business activities. Through investment in food safety and quality, innovation, optimisation of the supply chain and communication with customers and consumers, the Group reaffirms our commitment to responsible, sustainable production.



To guarantee access to raw materials in optimum conditions and mitigate risks in the supply chain, the Group has negotiated strategic agreements with key suppliers present in production and export markets. We also invest in certifications and audits that guarantee our compliance with the highest food safety and quality standards. In the area of innovation, the Group allocates resources to its R&D and innovation facilities, where it develops new solutions and products that respond to market trends and consumer needs, thus promoting a more diversified, sustainable and healthy offer.

Finally, the Group has tools and teams for engaging with customers and consumers, guaranteeing a continuous flow of information and enhancement of user experience.

To conclude this chapter, we should mention that the Group did not have any severe problems or incidents related with Human Rights in respect of our consumers and end-users in 2024.

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## S4-5. Targets related to managing impacts

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\*(81)

At present the Ebro Group does not have any quantifiable targets referring to consumers. However, it has established four key principles which provide a reference framework and must be followed in all the Group's subsidiaries:

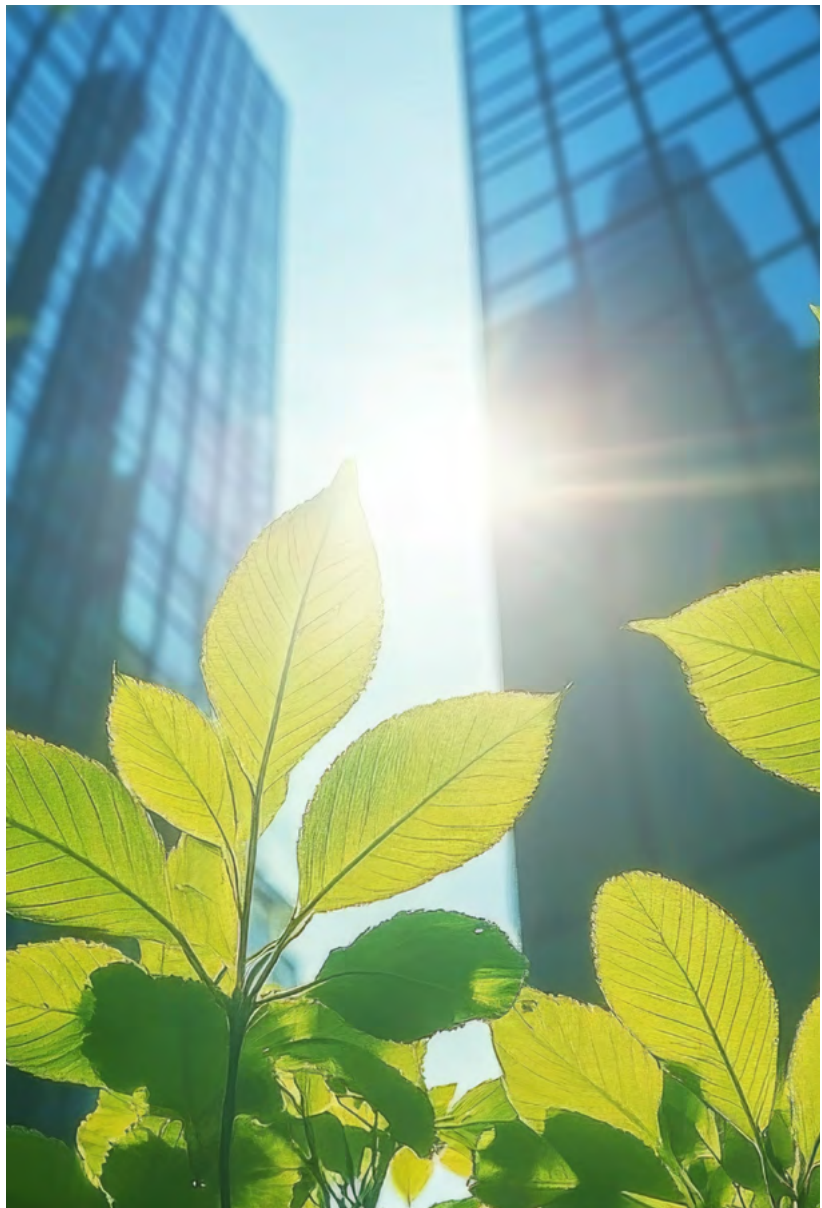
1. Offer a broad portfolio of healthy, differentiated food products.
2. Anticipate and meet their needs for consumption.
3. Guarantee top quality in our products and services, meeting not only the quality standards and requirements stipulated in law, but also any stricter standards to guarantee that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

Customer and consumer views are incorporated to adapt these targets to each geographical market as follows:

- ✱ Setting targets: Subsidiaries obtain information on consumer needs and expectations through market surveys, trend analysis, satisfaction surveys and customer service channels. This information is vital to guarantee a focus adapted to each market and its respective consumers.
- ✱ Participation in performance tracking in respect of the targets: Vital information is obtained through regular satisfaction surveys, consumer trend analysis and customer services systems to assess the degree of achievement of our commitments. In the case of strategic customers distributors and retailers, regular meetings are held to discuss key quality indicators, consumer trends and service performance.
- ✱ Identification of improvements and lessons learned: Access to the improvements made and lessons learned is channelled through different communication tools, which include updates in product labelling and packaging, point-of-sale communications, newssheets, social networks, etc. In the case of large customers and distributors, the outcomes and progress are shared at regular meetings and information-sharing forums.

The Group does not plan to establish Group-level quantitative targets in a given time horizon.

# GOVERNANCE





## ESRS G1

# BUSINESS CONDUCT

### List of IROs associated with GOV-1

#### Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH THE IRO
RESPONSIBLE VALUE CHAIN					
IP-59	Ability to support respect for human rights and social and environmental development by fostering the assessment and selection of suppliers based on social, ethical and environmental criteria.	I+	A	Ups OO Down	Group Code of Conduct  Sustainability, Environment and Corporate Social Responsibility Policy
IN-06	Positive influence on standards and practices in the food sector by joining sector-specific initiatives or collaborative platforms on sustainability and ethics-related topics (e.g.: <i>Forética</i> and SAI Platform).	I+	A	OO Down	Sustainability, Environment and Corporate Social Responsibility Policy
IN-63	Increased demands of suppliers, who must strengthen sustainability-related aspects. This is due to the inclusion of new clauses in the Group's contracts in the wake of the new regulations on ESG.	I-	P	Ups OO Down	Medium term  Risk Control and Management Policy  Sustainability, Environment and Corporate Social Responsibility Policy
O-57	Strengthening of risk management in the Group's supply chain through the platform Countryrisk.io, prioritising due diligence with critical suppliers to mitigate identified risks.	O	P	Ups OO Down	Short term  Risk Control and Management Policy  Sustainability, Environment and Corporate Social Responsibility Policy
R-53	Increase in operating costs as a result of unexpected fluctuations in input prices, quality issues in supplies that require additional corrections, or exchange rate fluctuations due to our dependence on suppliers located in different countries.	R	A	Ups OO Down	Short term  Risk Control and Management Policy  Sustainability, Environment and Corporate Social Responsibility Policy
R-55	Loss of existing suppliers who fail to meet the new sustainability requirements.	R	A	Ups O Down	Short term  Group Code of Conduct

#### KEY: Impact

I+: Positive Impact   I-: Negative Impact   O: Opportunity   R: Risk   P: Potential   A: Actual

#### KEY: Value Chain (VC)

Ups: Upstream   OO: Own Operations   Down: Downstream

## GOV-1. The role of the administrative, supervisory and management bodies

\*(5a,5b)

The Ebro Foods Group has a sound governance framework that guarantees oversight of and compliance with the principles of business conduct in all our activities. This framework is structured through the Code of Conduct (COC), which establishes the ethical rules and conduct to be followed by all the Group's professionals, regardless of their hierarchical level or geographical location.

### FUNDAMENTAL ETHICAL PRINCIPLES OF THE COC

The essential principles underlying the Group's business conduct are:

- \* Regulatory compliance: respect for the applicable laws in all the countries in which the Group operates.
- \* Integrity and transparency: commitment to honesty in trade and financial relations.
- \* Respect for Human Rights: especially in the value chain and relations with suppliers.
- \* Responsible business practices: prohibition of bribery and corruption and commitment to fair competition.

The Code of Conduct, together with the involvement of its administrative, management and supervisory bodies, guarantees effective application of the Group's principles of business conduct, boosting a sound ethics culture throughout our Organisation.

### ROLE OF THE ADMINISTRATIVE AND SUPERVISORY BODIES

#### 1. Responsibility of the Board of Directors

The Board of Directors is the most senior body accountable for compliance with the Code of Conduct throughout the Organisation. Its key duties include:

- \* Define the Group's values and ethical principles and see that they are incorporated in the business strategy and operations.
- \* Approve compliance policies and internal control mechanisms.
- \* Receive regular information on the level of compliance with the Code and any major incidents.

#### 2. Supervision through the Audit, Control and Sustainability Committee

The Audit, Control and Sustainability Committee has a fundamental role in the supervision of business conduct, including:

- \* Control correct application of the Code of Conduct in all the Group's operations.
- \* Regularly assess the effectiveness of our internal controls and propose improvements where necessary.
- \* Receive and analyse reports on possible breaches and recommend remedial measures.
- \* Organise training sessions to ensure that the governance and management bodies have adequate knowledge on compliance and business ethics.

The Committee is assisted in these duties by the Compliance Unit, which is responsible for management of the Ethics Channel and for analysing any possible breaches.

### 3. Responsibility of Management and the Management Bodies

The Management Committees of our subsidiaries play a key role in the supervision and management of business conduct within their respective areas of action. Their responsibilities include:

- \* Implement and ensure application of the Code of Conduct in our subsidiaries.
- \* Foster a culture of integrity and ensure that all business decisions respect the Group's ethics principles.
- \* Report any significant incident to the Audit, Control and Sustainability Committee and the Board of Directors.
- \* Provide training for employees and management teams to increase their knowledge on ethics standards and compliance.

#### CONTROL AND GRIEVANCE MECHANISMS

To guarantee transparency and compliance with the principles of business conduct, the Code of Conduct establishes the following:

- \* A Whistleblowing Channel available for all the Group's stakeholders, through which they can report confidentially any possible breach.
- \* Protection from retaliation for those reporting irregularities in good faith.
- \* A process for analysing complaints, led by the Audit Committee and the Compliance Unit, ensuring that the appropriate measures are taken.

As mentioned in the indicator GOV-2 of ESRS 2, the governance bodies of the Ebro Group have the necessary expertise and experience to supervise sustainability matters, which includes oversight of business conduct, as both areas are closely linked within the Group's compliance and governance framework.

The members of the Board of Directors and other supervisory bodies have extensive expertise in business and sustainability matters and experience in major companies with similar compliance and corporate ethics requirements.

In addition, apart from their lengthy track record, those responsible for the management of ESG matters in the Group have substantial expertise in the matter, which they update constantly through training courses, attendance of webinars and other events organised by prominent entities in these issues.

## G1-1. Corporate business conduct policies

CODE OF CONDUCT OF THE EBRO FOODS GROUP	
MDR-P 65(a)	<p><b>Contents:</b> The Code of Conduct sets out the principles and values that should inspire the actions of the companies and persons in the Ebro Foods Group and the rules binding on the Professionals in the performance of their duties (listed in point 7). The most relevant points regarding Governance are:</p> <p><b>Compliance:</b> Point 8 "General principles" Point 27 "Relations with Authorities, Regulatory Bodies and Governments" Point 32 "Whistleblowing channel"</p> <p><b>Integrity and transparency:</b> Point 17 "Gifts" Point 18 "Confidential information" Point 20 "Relations with shareholders" Point 28 "True, adequate information"</p> <p><b>Respect for Human Rights:</b> Point 9 "Commitment to human rights" Point 21 "Relations with suppliers"</p> <p><b>Responsible business practices:</b> Point 16 "Conflicts of interest" Point 23 "Relations with rivals" Point 29 "Anti-corruption, bribery, illegal commissions, influence peddling and money laundering"</p>
MDR-P 65(b)	<p><b>Scope:</b> The Group COC, as stipulated in point 4, is applicable to:</p> <p>4.1. Each and all of the Professionals, regardless of their hierarchical level, position and geographical location.</p> <p>4.2. Customers, suppliers, shareholders and other stakeholders with which the Ebro Foods Group interacts in its operations.</p> <p>4.3. Extended to any other persons related with the Group or the Professionals whenever, by virtue of the nature of that relationship, their actions may in any way affect the reputation of the Group or any of its companies.</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b> The Audit, Control and Sustainability Committee reports regularly to the Board of Directors of Ebro Foods</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> </ul>
MDR-P 65(e)	<p>The Code is an essential part within the crime prevention model implemented by the Ebro Foods Group, making it importance for all those bound by its terms to be familiar with and observe it.</p>
MDR-P 65(f)	<p><b>Availability:</b> The COC is available on the Group's corporate website (<a href="#">Código-de-Conducta</a>). Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.</p>

## SUSTAINABILITY, ENVIRONMENT AND CORPORATE SOCIAL RESPONSIBILITY POLICY

MDR-P 65(a)	<p><b>Contents:</b></p> <p>The Group thus undertakes, as an essential principle in its actions, the creation of a business model that is respectful of and sustainable for the environment and society overall and, while ensuring value, profitability and competitiveness, it promotes diversity, respect for human rights, tax responsibility and the prevention of corruption, thus contributing towards the progress of society and generating trust among our stakeholders.</p> <p><b>Principles of action (point 5)</b> The most relevant points for Governance are:</p> <ul style="list-style-type: none"> <li>5.1. With regard to good corporate governance and ethical business management</li> <li>5.2. With regard to financial sustainability and long-term focus</li> <li>5.4. With regard to human rights</li> <li>5.6. With regard to sustainability of the value chain</li> <li>5.7. With regard to suppliers and customers</li> <li>5.10. With regard to the rendering of accounts and transparency</li> </ul> <p><b>Specific areas of action (point 6)</b> The Policy establishes: "(i) the five pillars of action identified, (ii) the business practices required of our suppliers and (iii) the Group's practices in respect of diversity, risks, including tax risks, prevention of corruption and bribery and illegal conduct, and the communication of information." The most relevant points for Governance are:</p> <ul style="list-style-type: none"> <li>6.8. With regard to tax risks</li> <li>6.9. With regard to corruption and bribery</li> <li>6.10. With regard to the communication of information</li> </ul>
MDR-P 65(b)	<p><b>Scope:</b></p> <p>The Policy is applicable to the Company and the Group. The Group companies may also develop their own internal regulations on any subject-matter falling within the scope of this Policy, provided they do not contradict the principles established therein or in other applicable internal Policies or Codes related with this one and lay down more stringent requirements.</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b></p> <p>The Board of Directors is responsible for its approval and the Audit, Control and Sustainability Committee for its oversight and implementation</p>
MDR-P 65(d)	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> <li>• Conformity with section 529 ter of the Corporate Enterprises Act ("LSC")</li> </ul>
MDR-P 65(e)	<p>This Policy is supplemented and developed by the other Policies and internal regulations of the Ebro Group, particularly the Group's Code of Conduct, Supplier Code of Conduct and the Policies on Social Action; Communication of Financial, Non-Financial and Corporate Information; Communication and Relations with Shareholders, Institutional Investors and Proxy Advisors; Risk Control and Management; and Corruption and Bribery.</p>
MDR-P 65(f)	<p><b>Availability:</b></p> <p>This Policy is available on the Group's corporate website (<a href="#">Politica-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a>)</p> <p>Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.</p>

## POLICY AGAINST CORRUPTION AND BRIBERY OF THE EBRO GROUP

MDR-P 65(a)	<p><b>Contents:</b></p> <p>The Policy is based on the principle of "zero tolerance" of corruption and fraud in business. This principle is absolute and prevails over any kind of economic benefit that may be obtained for the Group and/or its professionals. Over and beyond mere observance and compliance with the laws and standards applicable to each of the companies in the Ebro Group because of the business they perform or the countries in which they operate, this Policy is governed by principles of maximum transparency, honesty, integrity and responsibility.</p> <p>In point 5, "<b>Obligations and prohibited conduct</b>", the Policy prohibits the conduct described below in the following areas, among others:</p> <ul style="list-style-type: none"> <li>5.1. Fight against corruption, bribery, illegal commissions, influence peddling and money laundering</li> <li>5.2. Gifts and courtesies</li> <li>5.3. Authorities, regulatory bodies and government agencies</li> </ul>
	<p>This Policy is structured in accordance with the Code of Conduct of the Ebro Group, the latter being an essential part of the Ebro Foods Group crime prevention model and all employees, executives and directors of each and every company in the Ebro Group, including permanent representatives of corporate directors (the "Professionals") are obliged to know and comply with it.</p>

## POLICY AGAINST CORRUPTION AND BRIBERY OF THE EBRO GROUP

<b>MDR-P 65(b)</b>	<b>Scope:</b> The Policy applies to all the Professionals of both Ebro Foods and the subsidiaries of the Ebro Group in all the countries in which the Group operates. This Policy is extensive to the Ebro Foods Foundation (the "Foundation") through the professionals of the Ebro Group that collaborate with the Foundation and any third parties who intervene, collaborate or participate in the business of the Group's companies and the activities of the Foundation.
<b>MDR-P 65(c)</b>	<b>Most senior level accountable for implementation:</b> The Audit, Control and Sustainability Committee
<b>MDR-P 65(d)</b>	<b>Disclosure of third-party standards or initiatives to which Group commits</b> Act 11/2018
<b>MDR-P 65(e)</b>	N/A
<b>MDR-P 65(f)</b>	<b>Availability:</b> This Policy is private. It is also available in the different intranets of the Group.

## EBRO FOODS RISK CONTROL AND MANAGEMENT POLICY

<b>MDR-P 65 a)</b>	<b>Contents:</b> This Policy lays down the basic principles and general framework for control and management of the business risks, including tax risks, and internal control of financial reporting to which the Ebro Foods Group is exposed. By setting these basic principles and rules of the system it is intended to establish the criteria to be observed by the management of the Group businesses in the handling and management of the risks to which they are exposed. In point 4, "Identification of risks", the following points are applicable to Governance: <ul style="list-style-type: none"> <li><b>4.1. Operating risks:</b> <ul style="list-style-type: none"> <li>a. Health and environmental risks</li> <li>b. Raw material supply risk</li> <li>c. Market risk (prices)</li> <li>d. Customer concentration risk</li> </ul> </li> <li><b>4.2. Compliance risks:</b> <ul style="list-style-type: none"> <li>a. Regulatory risks</li> <li>b. Reputational risks</li> <li>c. Tax risks</li> </ul> </li> <li><b>4.3. Strategic risks:</b> <ul style="list-style-type: none"> <li>a. Market risk</li> </ul> </li> <li><b>4.4. Financial risks:</b> <ul style="list-style-type: none"> <li>a. Customer credit risk</li> </ul> </li> <li><b>5. Risk control and management system</b> <ul style="list-style-type: none"> <li>5.1. Business risks</li> <li>5.2. Internal control of financial reporting</li> <li>5.3. Tax risks</li> </ul> </li> <li><b>6. Risk mitigation measures and tolerance</b></li> </ul>
	This Policy is structured in accordance with the Code of Conduct of the Ebro Group, the latter being an essential part of the Ebro Foods Group crime prevention model and all employees, executives and directors of each and every company in the Ebro Group, including permanent representatives of corporate directors (the "Professionals") are obliged to know and comply with it.
<b>MDR-P 65 b)</b>	<b>Scope:</b> The Policy is applicable to all the companies in the Group, without prejudice to any specific regulation that may be binding on the foreign subsidiaries in their respective countries. The provisions of the Policy are applicable to its foreign subsidiaries, Although those local regulations are applicable at all times, the foreign subsidiaries will also be bound by the principles, criteria and control structures established in this Policy insofar as compliance therewith will not result in infringement of the local laws and regulations.
<b>MDR-P 65 c)</b>	<b>Most senior level accountable for implementation:</b> The Board of Directors The Audit, Control and Sustainability Committee
<b>MDR-P 65 d)</b>	<b>Disclosure of third-party standards or initiatives to which Group commits</b> Code of Good Governance for Listed Companies
<b>MDR-P 65 e)</b>	N/A
<b>MDR-P 65 f)</b>	<b>Availability:</b> This Policy is private and not available to the public. It is available in the different intranets for professionals of the Group.

## G1-2. Management of relationships with suppliers

\*(14,15)

The Ebro Group manages its relationships with suppliers with a focus on responsibility and sustainability, integrating social, environmental and business ethics criteria to mitigate the risks associated with our supply chain. This commitment is reflected in our Code of Conduct and in our Supplier Code of Conduct, which establish the principles and requirements governing collaboration with their business partners.

### PREVENTION OF LATE PAYMENT

The Group does not have a policy to avoid late payments to suppliers, regardless of their size, but our normal practice is to make payments at least on one set date each month. See G1-6.

### ETHICAL AND SOCIAL COMMITMENT TO SUPPLIERS

The Group's Code of Conduct stipulates that suppliers and collaborators must act with integrity and responsibility in line with the Group's values. In particular, they are required to:

- \* Respect for human and labour rights, guaranteeing safe, decent working conditions.
- \* Avoid any form of labour exploitation, including child and forced labour.
- \* Comply with all applicable standards in respect of health, safety and well-being at work.
- \* Prevent bribery and corruption, guaranteeing transparency in our trade relations.

The Group also promotes trade relationships base on trust, fairness and transparency, avoiding conflicts of interest and ensuring that suppliers are selected according to objective criteria.

The specific articles referring to all these commitments are:

- 21.1.** The Group shall promote the assessment and selection of its suppliers based on social, ethical and environmental criteria, with a view to selecting those which, apart from offering the best bargaining terms, share the principles and commitments described in this Code.
- 21.4.** When selecting its suppliers, the Group shall value those that (i) comply with the laws and regulations in place, (ii) respect internationally proclaimed human rights and (iii) make sure they do not violate or abuse any human rights within their business operations.
- 21.7.** In the selection of suppliers, the Group shall assess the promotion and respect by candidates of the following principles:
  - \* Abolish all forms of child labour.
  - \* Eliminate all forms of forced and compulsory labour.
  - \* Avoid discrimination in any job.
  - \* Respect the maximum working hours and minimum wages established in the national laws in place in the country in which they operate.
  - \* Ensure that their employees do their work according to occupational safety and hygiene standards.
- 21.8.** The Group shall also assess potential suppliers' commitment to minimising the environmental impact of their operations and promote the development and propagation of environmentally friendly technologies.

## EVALUATION OF RISKS IN THE SUPPLY CHAIN AND SUSTAINABILITY CRITERIA

The Supplier Code of Conduct supplements these requirements by establishing specific standards for our business partners, especially those operating in regions with greater social or environmental risks. The Code requires suppliers to:

- \* Comply with the applicable environmental laws and regulations and take measures to reduce their environmental impact.
- \* Foster efficient use of natural resources and reduce waste and polluting emissions.
- \* Implement due diligence policies in their supply chains to guarantee compliance with these principles among their own suppliers and subcontractors.

To ensure compliance with these commitments, the Ebro Foods Group makes regular audits and controls, requiring our suppliers to heed these principles and implement improvement plans whenever any deviations are detected.

In this regard, the Group's strategy with suppliers combines a preventive approach based on due diligence and risk evaluation with the development of initiatives that promote sustainable business practices, thereby guaranteeing a supply chain aligned with our values and commitments to social and environmental responsibility.

## Taking action to manage IROs

(68,69,81)

### MDR-A: Governance

ACTION		SCOPE*	SUPERVISION	TIME HORIZON	MEASURES
Audit, Control and Sustainability Committee of the Ebro Group	Oversight and monitoring of: <ul style="list-style-type: none"><li>• Group internal risk control system.</li><li>• Financial information.</li><li>• Risk Management Systems.</li></ul>	Ups OO Down	Board of Directors.	Inherent functions that have always been done.  Reports regularly.	It is a measure of continuous tracking, control and monitoring. <ul style="list-style-type: none"><li>• Propose to the Board possible measures to improve control and/or management.</li></ul>
Communication and Sustainability Department of the Ebro Group	Develop/complete and monitor: <ul style="list-style-type: none"><li>• Country Risk in Human Rights and Environment (countryrisk.io).</li><li>• Sustainability Indexes that the Group has joined.</li><li>• Due Diligence in Social Responsibility.</li></ul>	Ups OO Down	Audit, Control and Sustainability Committee.  Risks Committee.	Established since creation of the department.  Continuous.	It is a measure of continuous tracking, control and monitoring. <ul style="list-style-type: none"><li>• Mitigate and/or avoid risks related to Human Rights and Environment.</li><li>• Analysis of possible improvements in respect of the value chain.</li></ul>
Internal Audit Department of the Ebro Group	Supervision of the following activities: <ul style="list-style-type: none"><li>• Testing.</li><li>• Control of risk management systems.</li><li>• Financial information of our subsidiaries.</li></ul>	OO	Audit, Control and Sustainability Committee.	Inherent functions that have always been done.  Continuous.	It is a measure of continuous tracking, control and monitoring. <ul style="list-style-type: none"><li>• Reports any Non-Compliance.</li></ul>



## MDR-A: Governance

	ACTION	SCOPE*	SUPERVISION	TIME HORIZON	MEASURES
Risks Committee of Ebro Foods	Specific unit for: <ul style="list-style-type: none"> <li>• Coordination and monitoring of the risk control and management system (including tax risks).</li> <li>• Control of the Group's financial information.</li> <li>• Analysis and evaluation of risks associated with new investments.</li> </ul>	OO Down	Audit Committee.  Board of Directors.	Inherent functions that have always been done.  Continuous.	It is a measure of continuous tracking, control and monitoring. <ul style="list-style-type: none"> <li>• Reports any Non-Compliance.</li> <li>• Proposes measures to address possible risks.</li> </ul>

**KEY: Scope\***

Ups: Upstream OO: Own Operations Down: Downstream

The financial information related with these actions is included in their budgets. The actions are cross-cutting over the different departments involved and are not part of a specific action plan related with the business conduct standard. There are no tracking metrics or quantitative targets associated with the development of these actions. At present there is no further information available regarding the allocation of financial resources.

## G1-6. Payment practices

\*(33)

The Ebro Group does not have a specific policy on payments to suppliers, although under our commitment to this stakeholder, suppliers' invoices are paid in due time and form regardless of their size and category, and in strict compliance with the laws in place in the countries in which they operate.

Standard payment practice varies depending on the type of suppliers: it is practically immediate for purchases of raw materials from growers or small cooperatives, since payments on account are often made to strengthen supplier loyalty and product excellence. Moreover, the country in which goods and services are purchased and the business policies and/or laws in those countries have a strong bearing on determination of the payment period: standard practice in the United States is to prioritise prompt payment, whereas in the European Union, the countries adapt their laws to Directive 2019/633 on unfair trading practices in business-to-business relationships in the agricultural and food supply chain, which sets the maximum payment times to suppliers of these products at 30 or 60 days after the date of delivery, depending on whether the products are perishable or not.

The average payment period calculated for the Group in 2024 was 28.66 days, which is close to the period declared for our Spanish companies, estimated at 31.10 days in the current year, as described in **Note 27** to the accompanying consolidated annual accounts.

As we have no policy or standard payment terms, it is not possible to state the percentage of payments aligned with those terms.

The Ebro Group has no significant legal proceedings currently outstanding for late payments. The Group's legal proceedings are described in **Note 20.1**. Litigation and disputes in the accompanying consolidated annual accounts.

# ANNEXES



ANNEXES

5.1. Sector-Specific – R&D+I

Impacts, Risks and Opportunities

CODE	DESCRIPTION	IMPACT	VC	TIME HORIZON	POLICIES ASSOCIATED WITH THE IRO
SECTOR-SPECIFIC: INNOVACIÓN					
R-59	Increase in costs above those initially budgeted in the implementation of the Group's research, development and innovation (R&D + innovation) projects. A shortage of financial resources can lead to slow or insufficient development of the project	R	A	OO	Short term Code of Conduct of the Ebro Group Risk Control and Management Policy

**KEY: Impact**  
I+: Positive Impact   I-: Negative Impact   O: Opportunity   R: Risk   P: Potential   A: Actual

**KEY: Value Chain (VC)**  
Ups: Upstream   OO: Own Operations   Down: Downstream

CROSS-CUTTING AND SECTOR-SPECIFIC IROS

During the Group's Double Materiality Assessment, in pursuance of paragraph 131(b) of ESRS 1, in addition to the 259 IROs identified at Topic, Sub-Topic and Sub-Sub-Topic level, as shown in the above table, one sector-specific IRO was identified, corresponding to the topic "Innovation and Digitalisation".

As mentioned in ESRS 2, [page 554](#), we opted for partial omission of information in this section, because innovation and technological development are a key strategic asset for Ebro Foods. In a highly competitive sector as is the food sector, differentiation is crucial to consolidate our leadership, guarantee the sustainability of the business and respond to changing demands on the market. Our capacity to develop our own technologies, optimise processes and create unique products enables us to offer a portfolio with high value added, anticipating trends and consumer needs. Sharing certain specific aspects of our R&D+I strategy could jeopardise that competitive advantage, so in line with best business practices, we have decided to exercise the option of partial omission on this point.

INNOVATION AS A DRIVING FORCE FOR GROWTH AND DIFFERENTIATION

Innovation is the basic pillar on which Ebro Foods builds our growth and differentiation strategy in the market. Our commitment to R&D and innovation not only corresponds to the need to develop new solutions in the food sector, but is also a key tool for contributing value to both our customers and end-consumers.

We focus our strategy on consumers, directing research and development to create products that meet their nutritional requirements, consumer habits and quality expectations. Our ability to anticipate these trends and transform them into innovative solutions enables us to maintain a diversified portfolio with a high value added, differentiating ourselves in a highly competitive environment.

To achieve this we have a sound innovation structure based at our own research centres in France, United States, Netherlands, Italy and Spain, where we stimulate the development of new technologies and unique products in the market. This approach not only strengthens our leadership in the segments in which we operate, but also allows us to evolve towards a more sustainable, efficient business model aligned with society's expectations.

## GOVERNANCE

The Group's Board of Directors is accountable for supervising the principal general strategies in respect of Research, Development and Innovation (R&D+I), defining the guidelines and establishing priorities at Group level.

On this basis, the Group's R&D+I activity is structured into two major areas:

1. B2C business, focusing on the extension and development of our brands
2. B2B business, focusing on the development of ingredients

The management and execution of this strategy is directed from two main innovation hubs: Spain (Herba Ricemills) and France (Lustucru Premium Groupe), each under the management and supervision of its respective General Manager.

In Spain, coordinated by Herba Ricemills, we have the following specialist centres:

- \* La Rinconada (Seville): a benchmark in the development and innovation of ready-to-serve meals and dry rice.
- \* Moncada (Valencia): specialising in innovation within the ingredients business.

In France, Lustucru Premium Groupe leads innovation in the fresh segment from its R&D+I centre in Lyon.

These main hubs are supplemented by other, smaller innovation structures in Italy (dry pasta and fresh pasta), Netherlands (ingredients) and USA (rice). These units operate under the direction of their respective General Managers, who report directly to the Chief Operating Officer (COO) and the Executive Chairman of the Group. In turn, they both report regularly to the Board of Directors, ensuring that the R&D+I strategy is aligned at all times with the Group's global targets.

Knowledge is transferred within the Group through coordination among the different General Managements and the Group's R&D+I teams. The Global Chief Marketing Officer plays a key role in this process, not only fostering the creation of synergies between different markets, but also identifying opportunities to adapt and introduce products in new geographies, aligning commercial and innovation strategies to maximise their impact.

The strategy established by the Board of Directors and developed by the R&D+I managers is supervised and monitored through internal control mechanisms, with a regular review of progress and evaluation of the impact of the projects on innovation and competitiveness.

In this context, the Group has incorporated R&D+I management in its corporate governance framework, establishing specific processes to make sure it is aligned with the strategic needs of the business and contributes to generating value.



These processes include:

- \* **Supervision of the R&D+I area:** the senior management regularly assesses the performance of the section managers and their alignment with the corporate targets.
- \* **Internal coordination:** the integration of R&D+I with other key functions of the Group is encouraged, ensuring synergies with areas such as production, sustainability, marketing and business development.
- \* **Management of risks and opportunities:** procedures have been established to identify and mitigate risks associated with innovation and maximise opportunities in this area.

## POLICIES

Within the Group's regulatory framework, the principal policies that explicitly mention the importance of R&D and innovation in the performance of our business operations are:

- \* The Group Code of Conduct
- \* The Risk Control and Management Policy

CODE OF CONDUCT OF THE EBRO FOODS GROUP	
MDR-P 65(a)	<p><b>Contents:</b></p> <p>The Code of Conduct (COC) sets out the principles and values that should inspire the actions of the companies and persons in the Ebro Foods Group and the rules binding on the Professionals in the performance of their duties, The applicable principles of the COC in the area of Innovation are:</p> <p><u>7. Mission, vision and values</u></p> <p>7.1. The Group's mission is to research, create, produce and put on the market foods with a high value added, which satisfy people's nutritional requirements while enhancing their health and well-being.</p> <p>7.2. The Group's vision is to achieve sustainable growth while ensuring ethical behaviour and personal and professional integrity in its business, creating value for shareholders and other stakeholders, minimizing the impact of its operations on the environment, improving the quality of life of society and satisfying the needs of its customers and consumers.</p> <p><u>19. Inside information</u></p> <p>19.1. Inside information is any specific information on the Group or its business activities that is not public and which, were it to be or have been made public, could affect the business or share price of Ebro Foods.</p> <p>19.2. Professionals who have access to any inside information of the Group shall not disclose that information to any third parties outside the transaction to which the inside information refers.</p> <p><u>23. Relationships with rivals</u></p> <p>23.1. The Group undertakes to compete fairly on the markets in which it operates, encouraging free competition, complying with the laws in place and avoiding any abusive conduct or restrictive practices.</p> <p>23.2. The Group prohibits any actions entailing unfair competition and undertakes to ensure compliance with the fair trading laws applicable in the countries in which it operates.</p> <p>23.3. The Professionals shall abstain from any unlawful use of the creations, work, distinguishing marks or, in general, the intellectual and industrial property rights of rivals and third parties.</p>
	<p><b>Scope:</b></p> <p>The Group COC, as stipulated in point 4, is:</p> <p>4.1. Binding on each and all of the Professionals, regardless of their hierarchical level, position and geographical location.</p> <p>4.2. Binding on customers, suppliers, shareholders and other stakeholders with which the Ebro Foods Group interacts in its operations.</p> <p>4.3. Extended to any other persons related with the Group or the Professionals whenever, by virtue of the nature of that relationship, their actions may in any way affect the reputation of the Group or any of its companies.</p>
	<p><b>Most senior level accountable for implementation:</b></p> <p>The Audit, Control and Sustainability Committee reports regularly to the Board of Directors of Ebro Foods.</p>
	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <ul style="list-style-type: none"> <li>• Universal Declaration of Human Rights</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• ILO Conventions and Recommendations</li> </ul>
	N/A

## CODE OF CONDUCT OF THE EBRO FOODS GROUP

<b>MDR-P 65(f)</b>	<b>Availability:</b> The COC is available on the Group's corporate website ( <u>Código-de-Conducta</u> ). Privately, this Policy is also in the different intranets of the Group and must necessarily be made available to any supplier/service provider in the Group's supply chain.
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## EBRO FOODS RISK CONTROL AND MANAGEMENT POLICY

<b>MDR-P 65 a)</b>	<b>Contents:</b> This Policy lays down the basic principles and general framework for control and management of the business risks, including tax risks, and internal control of financial reporting to which the Ebro Foods Group is exposed. By setting these basic principles and rules of the system it is intended to establish the criteria to be observed by the management of the Group businesses in the handling and management of the risks to which they are exposed. <u>(Point 4.1.) Operating risks</u> (e) Competition risk: In general, pressure from private label products is the largest threat to maintaining the market share of the Group's brands. (h) Technological risk: One of the most important tools for standing up to competition is technological innovation and the endeavour to adapt to consumer desires, so "trailing behind in technology" is also considered a material risk. <u>(Point 4.3.) Strategic risks</u> (a) Market risk. The international nature of the Group's activity means that it may be affected by political and economic circumstances prevailing in the different states in which it operates, and by other market variables, such as exchange rates, interest rates, costs of production, etc.
<b>MDR-P 65 b)</b>	<b>Scope:</b> The Policy is applicable to all the companies in the Group, without prejudice to any specific regulation that may be binding on the foreign subsidiaries in their respective countries. The provisions of the Policy are applicable to its foreign subsidiaries, Although those local regulations are applicable at all times, the foreign subsidiaries will also be bound by the principles, criteria and control structures established in this Policy insofar as compliance therewith will not result in infringement of the local laws and regulations.
<b>MDR-P 65 c)</b>	<b>Most senior level accountable for implementation:</b> The Board of Directors The Audit, Control and Sustainability Committee
<b>MDR-P 65 d)</b>	<b>Disclosure of third-party standards or initiatives to which Group commits</b> Code of Good Governance for Listed Companies
<b>MDR-P 65 e)</b>	N/A
<b>MDR-P 65 f)</b>	<b>Availability:</b> This Policy is private and not available to the public. It is available in the different intranets for professionals of the Group.

## STRATEGY AND MANAGEMENT OF IROS

The Group has consolidated its R&D+I strategy as a key pillar for its growth and leadership in the food sector. Our commitment to innovation is based on constant investment in research and development with a view to anticipating consumer trends and offering products that respond to society's nutritional needs, offering value added. For this purpose, as we have mentioned earlier, we have a network of research centres where we develop innovative solutions aligned with our business model.

One of the main risks associated with this strategy is that costs might rise above those budgeted in the implementation of R&D+I projects, which could slow down or hamper the development of new solutions. The Group has taken several measures to mitigate this risk and guarantee the feasibility of our innovation strategy:

- ✳ **Financial planning:** Detailed budgets are drawn up for each project, with periodical review mechanisms to identify deviations and take timely corrective measures.
- ✳ **Diversification of financing sources:** External financing opportunities are explored, including grants and support programmes for innovation, to supplement our investment of own funds.

- \* **Optimisation of resources:** The network of research centres facilitates synergies and knowledge transfer between the different units of the Group, optimising the development of projects and reducing unnecessary costs.
- \* **Prioritisation of strategic projects:** Continuous assessment is made of the initiatives underway, in order to focus resources on those with the greatest chance of success and alignment with the Company's strategic targets.

#### **ACTIONS, METRICS AND TARGETS**

The Group exercises the option of partial omission on this point.

#### **REFERENCES TO R&D+I IN THIS STATEMENT**

The importance of R&D+I for the Ebro Group is mentioned in ESRS S4, specifically in S4-SBM-3: Group strategies to maximise our positive impact (pg. 628-631) and S4-4 (pg. 639-642).



## 5.2. List of datapoints in cross-cutting and topical standards that derive from other EU legislation

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	REFERENCE IN REGULATION ON THE DISCLOSURE OF INFORMATION RELATED TO SUSTAINABILITY IN THE FINANCIAL SERVICES SECTOR	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE
ESRS 2 GOV-1 Gender diversity on the Board of Directors paragraph 21(d)	Indicator no. 13 in Table 1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21(e)			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator no. 10 in Table 3 of Annex 1			
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40(d)(i)	Indicator no. 4 in Table 1 of Annex 1	Article 449a Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40(d)(ii)	Indicator no. 9 in Table 2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40(d)(iii)	Indicator no. 14 in Table 1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40(d)(iv)			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14				Regulation (EU) 2021/1119, Article 2(1)



DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	REFERENCE IN REGULATION ON THE DISCLOSURE OF INFORMATION RELATED TO SUSTAINABILITY IN THE FINANCIAL SERVICES SECTOR	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16(g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12(1) (d) to (g) and Article 12(2)	
ESRS E1-4 GHG emission reduction targets, paragraph 34	Indicator no. 4 in Table 2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book-Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6	
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	Indicator no. 5 in Table 1 of Annex 1			
ESRS E1-5 Energy consumption and mix, paragraph 37	Indicator no. 5 in Table 1 of Annex 1			
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Indicator no. 6 in Table 1 of Annex 1			
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44	Indicators no. 1 and 2 in Table 1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	Indicator no. 3 in Table 1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book-Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)	
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Regulation (UE) 2021/1119, Article 2(1)

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	REFERENCE IN REGULATION ON THE DISCLOSURE OF INFORMATION RELATED TO SUSTAINABILITY IN THE FINANCIAL SERVICES SECTOR	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk, paragraph 66(c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk		
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral		
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator no. 8 in Table 1 of Annex 1, Indicator no. 2 in Table 2 of Annex 1, Indicator no. 1 in Table 2 of Annex 1, Indicator no. 3 in Table 2 of Annex 1			
ESRS E3-1 Water and marine resources, paragraph 9	Indicator no. 7 in Table 2 of Annex 1			
ESRS E3-1 Dedicated policy, paragraph 13	Indicator no. 8 in Table 2 of Annex 1			
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Indicator no. 12 in Table 2 of Annex 1			

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	REFERENCE IN REGULATION ON THE DISCLOSURE OF INFORMATION RELATED TO SUSTAINABILITY IN THE FINANCIAL SERVICES SECTOR	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE
ESRS E3-4 Total water recycled and reused, paragraph 28(c)	Indicator no. 6.2 in Table 2 of Annex 1			
ESRS E3-4 Total water consumption in m3 per net revenue on own operations, paragraph 29	Indicator no. 6.1 in Table 2 of Annex 1			
ESRS 2 - IRO 1 - E4 paragraph 16(a)(i)	Indicator no. 7 in Table 1 of Annex 1			
ESRS 2 - IRO 1 - E4 paragraph 16(b)	Indicator no. 10 in Table 2 of Annex 1			
ESRS 2 - IRO 1 - E4 paragraph 16(c)	Indicator no. 14 in Table 2 of Annex 1			
ESRS E4-2 Sustainable land / agriculture practices or policies, paragraph 24(b)	Indicator no. 11 in Table 2 of Annex 1			
ESRS E4-2 Sustainable oceans / seas practices or policies, paragraph 24(c)	Indicator no. 12 in Table 2 of Annex 1			
ESRS E4-2 Policies to address deforestation, paragraph 24(d)	Indicator no. 15 in Table 2 of Annex 1			
ESRS E5-5 Non-recycled waste, paragraph 37(d)	Indicator no. 13 in Table 2 of Annex 1			
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Indicator no. 9 in Table 1 of Annex 1			
ESRS 2 - SBM3 - S1 Risk of incidents of forced labour, paragraph 14(f)	Indicator no. 13 in Table 3 of Annex I			
ESRS 2 - SBM3 - S1 Risk of incidents of child labour, paragraph 14(g)	Indicator no. 12 in Table 3 of Annex I			
ESRS S1-1 Human rights policy commitments, paragraph 20	Indicator no. 9 in Table 3 and Indicator no. 11 in Table 1 of Annex I			
ESRS S1-1 Due diligence policies on issues addressed by the Fundamental International Labour Organization Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	Indicator no. 11 in Table 3 of Annex I			

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	REFERENCE IN REGULATION ON THE DISCLOSURE OF INFORMATION RELATED TO SUSTAINABILITY IN THE FINANCIAL SERVICES SECTOR	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	Indicator no. 1 in Table 3 of Annex I			
ESRS S1-3 Grievance/ complaints handling mechanisms, paragraph 32(c)	Indicator no. 5 in Table 3 of Annex I			
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88(b) and (c)	Indicator no. 2 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88(e)	Indicator no. 3 in Table 3 of Annex II			
ESRS S1-16 Unadjusted gender pay gap, paragraph 97(a)	Indicator no. 12 in Table 1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-16 Excessive GEO-workers pay ratio, paragraph 97(b)	Indicator no., 8 in Table 3 of Annex I			
ESRS S1-17 Incidents of discrimination, paragraph 103(a)	Indicator no. 7 in Table 3 of Annex I			
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines, paragraph 104(a)	Indicator no. 10 in Table 1 and Indicator no. 14 in Table 3 of Annex II		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
ESRS 2 - SBM3 - S2 Significant risk of child labour or forced labour in the value chain, paragraph 11(b)	Indicators no. 12 and 13 in Table 3 of Annex I			
ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator no. 9 in Table 3 and Indicator no. 11 in Table 1 of Annex 1			
ESRS S2-1 Policies related to value chain workers, paragraph 18	Indicators no. 11 and 4 in Table 3 of Annex 1			
ESRS S1-1, Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines, paragraph 19	Indicator no. 10 in Table 1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	REFERENCE IN REGULATION ON THE DISCLOSURE OF INFORMATION RELATED TO SUSTAINABILITY IN THE FINANCIAL SERVICES SECTOR	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE
ESRS S2-1 Due diligence policies on issues addressed by the Fundamental International Labor Organisation Conventions 1 to 8, paragraph 19				
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Indicator no. 14 in Table 3 of Annex 1			
ESRS S3-1 Human rights policy commitments, paragraph 16	Indicator no. 9 in Table 3 and Indicator no. 11 in Table 1 of Annex 1			
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines, paragraph 17	Indicator no. 10 in Table 1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator no. 14 in Table 3 of Annex 1			
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Indicator no. 9 in Table 3 and Indicator no. 11 in Table 1 of Annex 1			
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17	Indicator no. 10 in Table 1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator no. 14 in Table 3 of Annex 1			
ESRS G1-1 United Nations Convention against Corruption, paragraph 10(b)	Indicator no. 15 in Table 3 of Annex 1			
ESRS G1-1 Protection of whistleblowers, paragraph 10(d)	Indicator no. 6 in Table 3 of Annex 1			
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24(a)	Indicator no. 17 in Table 3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24(b)	Indicator no. 16 in Table 3 of Annex 1			

### 5.3. Contents of NFRS (according to Act 11/2018)

In this annex, in addition to the CSRD requirements, we report on the indicators required under Act 11/2018 of 28 December amending the Spanish Commercial Code, the recast text of the Corporate Enterprises Act approved by Royal Decree Law 1/2010 of 2 July, the Audit (Non-Financial Reporting and Diversity) Act 22/2015 of 20 July and Act 5/2021.

The information to be disclosed under the CSRD does not coincide exactly with the indicators of Act 11/2018, which are explained in this Annex.

#### SOCIAL INFORMATION

The Group structures its culture around its employees, such that our business culture is aligned with any changes and challenges deriving from the transformation and evolution of our business, seeking the well-being, recognition and self-development of our employees.

#### BREAKDOWN OF TOTAL AND DISTRIBUTION OF GROUP EMPLOYEES

Supplementing the information reported in section S1 hereinabove, we set out below the breakdown of the total number and distribution of employees in 2024, by country, gender, age and category:

##### By gender

	2024		2023	
	NO, EMPLOYEES	% TOTAL EMPLOYEES	NO, EMPLOYEES	% TOTAL EMPLOYEES
Men	4,000	70.58%	3,906	71.07%
Women	1,667	29.42%	1,590	28.93%
<b>Total employees</b>	<b>5,667</b>		<b>5,496</b>	

##### By age group

	2024		2023	
	Nº EMPLEADOS	% S/TOTAL EMPLEADOS	Nº EMPLEADOS	% S/TOTAL EMPLEADOS
<=30	782	13.81%	767	13.96%
30 - 50	2,900	51.17%	2,854	51.93%
>= 50	1,985	35.02%	1,875	34.12%
<b>Total employees</b>	<b>5,667</b>		<b>5,496</b>	

## By country

	2024		2023	
	No. EMPLOYEES	% TOTAL EMPLOYEES	No. EMPLOYEES	% TOTAL EMPLOYEES
Argentina	222	3.92%	194	3.53%
Belgium	206	3.63%	201	3.66%
Cambodia	46	0.81%	32	0.58%
Canada	274	4.83%	240	4.37%
Denmark	91	1.61%	69	1.26%
France	612	10.80%	588	10.70%
Germany	181	3.19%	166	3.02%
Hungary	5	0.09%	5	0.09%
India	226	3.99%	214	3.89%
Italy	824	14.54%	786	14.30%
Morocco	209	3.68%	254	4.62%
Netherlands	87	1.54%	85	1.55%
Portugal	69	1.22%	70	1.27%
Spain	918	16.20%	917	16.68%
Thailand	211	3.72%	206	3.75%
United Arab Emirates	6	0.11%	---	0.00%
United Kingdom	452	7.98%	429	7.81%
United States	1,028	18.14%	1,040	18.92%
<b>Total empleados</b>	<b>5,667</b>		<b>5,496</b>	

## By professional category

	2024		2023	
	No. EMPLOYEES	% TOTAL EMPLOYEES	No. EMPLOYEES	% TOTAL EMPLOYEES
Senior Management	15	0.26%	*	*
Executives	310	5.47%	302	5.49%
Technical staff & middle management	969	17.10%	939	17.09%
Administrative & auxiliary staff	884	15.60%	815	14.83%
Factory employees	3,427	60.47%	3,370	61.32%
Others	62	1.09%	70	1.27%
<b>Total empleados</b>	<b>5,667</b>		<b>5,496</b>	

**Note:** In 2023 Senior Management was included in the Executives category.

## TYPES AND FORMS OF CONTRACT

The total number and distribution of forms of employment contract at 31 December 2024 was:

TYPE OF CONTRACT	2024	2023
Permanent	5,150	3,859
At-Will <sup>(i)</sup>	477	1,234
Temporary		305
<b>Nº total de contratados</b>	<b>5,597</b>	<b>5,398</b>

**Note:** <sup>(i)</sup> The At-Will contracts have been included in permanent contracts in 2024.

This indicator does not include data from the subsidiaries Ebrofrost Denmark and Transimpex, both of which have a total of 91 employees. The number of employees does not coincide with the number of contracts signed as one employee may have several contracts over the course of a year.

AVERAGE CONTRACTS BY GENDER	2024			2023		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Permanent	3,635	1,479	5,114	3,592	1,468	5,060
Temporary	302	191	493	294	124	418
Part-time	88	97	185	60	86	146

**\*Note:** The average numbers of permanent and temporary contracts include the average part-time contracts. We stress that the average number of permanent contracts rose in both men and women during 2024, reaching a total of 5,114. This is additional to the information disclosed in section S1-6-50(d.ii).

AVERAGE CONTRACTS BY AGE GROUP	2024				2023			
	<= 30	30-50	>= 50	TOTAL	<= 30	30-50	>= 50	TOTAL
Permanent	621	2,634	1,859	5,114	619	2,646	1,796	5,060
Temporary	179	228	86	493	152	200	65	418
Part-time	14	59	112	185	24	50	72	146

**\*Note:** The average numbers of permanent and temporary contracts include the average part-time contracts.

AVERAGE FULL-TIME AND PART-TIME PERMANENT CONTRACTS		
PROFESSIONAL CATEGORY	2024	2023
Executives	302	294
Technical staff & middle management	930	908
Administrative & auxiliary staff	776	746
Factory employees	3,049	3,047
Others	58	65
<b>Average permanent contracts</b>	<b>5,114</b>	<b>5,060</b>

AVERAGE FULL-TIME AND PART-TIME TEMPORARY CONTRACTS		
PROFESSIONAL CATEGORY	2024	2023
Executives	10	12
Technical staff & middle management	15	11
Administrative & auxiliary staff	64	60
Factory employees	397	329
Others	7	7
<b>Average temporary contracts</b>	<b>493</b>	<b>418</b>

AVERAGE PART-TIME PERMANENT AND TEMPORARY CONTRACTS		
PROFESSIONAL CATEGORY	2024	2023
Executives	12	5
Technical staff & middle management	26	20
Administrative & auxiliary staff	65	54
Factory employees	67	59
Others	15	9
<b>Average part-time contracts</b>	<b>185</b>	<b>146</b>



## NUMBER OF DISMISSALS BY GENDER, AGE AND PROFESSIONAL CATEGORY

There was a total of 236 dismissals in 2024, as against 226 in 2023. In both years, the highest number of dismissals was in factory employees.

	2024						TOTAL
	<= 30 OF AGE		30 - 50 OF AGE		>= 50 OF AGE		
	MEN	WOMEN	MEN	WOMEN	MEN	WOMEN	
Executives	0	2	2	0	1	0	5
Technical staff & middle management	1	9	4	3	2	0	19
Administrative & auxiliary staff	4	4	0	6	4	4	22
Factory employees	39	80	38	6	17	9	189
Others	0	0	0	0	1	0	1
TOTAL	44	95	44	15	25	13	236

	2023						TOTAL
	<= 30 OF AGE		30 - 50 OF AGE		>= 50 OF AGE		
	MEN	WOMEN	MEN	WOMEN	MEN	WOMEN	
Executives	0	1	2	1	0	2	6
Technical staff & middle management	2	1	11	6	11	0	31
Administrative & auxiliary staff	0	4	0	4	0	2	10
Factory employees	38	13	58	31	23	13	176
Others	0	0	3	0	0	0	3
TOTAL	40	19	74	42	34	17	226

## BENEFITS AND WORK-LIFE BALANCE FOR OUR EMPLOYEES

The figures set out below show the commitment of the Ebro Group regarding human resources and the minimum benefits we try to offer all our fulltime employees. In some cases the laws in place in each country in which we operate do not contemplate these benefits, which include collective bargaining, working from home and life insurance, among others.

## DISCONNECTION FROM WORK POLICIES

Within its commitment to work-life balance, the parent has established a digital disconnection protocol with a view to ensuring that our employees do not work longer than the established working times. This protocol is reviewed and updated regularly in the event of any change in the organisation and/or business activities of the company and taking account of any suggestions and proposals for improvement submitted by our professionals.

Apart from the parent, Bertagni, Lustucru Premium Groupe, Lustucru Riz, Lustucru Frais, Ebro Foods Belgium and Ebro Ingredients also have digital disconnection protocols and policies. In Ebrofrost Germany, the right to disconnection from work outside working hours is recognised in the laws in place in that country.

## 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.

## 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 working from home, 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.

## TRAINING

The Ebro Group contemplates the development of talent and personal and professional growth as part of its business strategy focused on the sustainability of human capital. Accordingly, one of the Group's main goals in respect of human resources is to foster training of our employees to guarantee successful performance of their duties and professional promotion.

HOURS TRAINING BY PROFESSIONAL CATEGORY	2024	2023
Executives	6,225	1,642
Technical staff & middle management	13,534	13,262
Administrative & auxiliary staff	26,733	6,696
Factory employees	89,532	112,902
Others	275	99
<b>Total hours training</b>	<b>136,298</b>	<b>134,601</b>

## EMPLOYEES COVERED BY COLLECTIVE BARGAINING OR OTHER AGREEMENTS

Although this figure is set out in section S1, Own workforce, Act 11/2018 requires undertakings to report any geographical or percentage variations from one year to the next in the percentage of employees of the Ebro Group who are covered by the collective bargaining agreements in their respective business areas, or another kind of collective agreement:

COUNTRY	2024	2023
Argentina	72.97%	73.20%
Belgium	100%	100%
Cambodia	100%	0%
Canada	64.23%	67.50%
Denmark	77%	100%
France	100%	100%
Germany	0%	0%
Hungary	0%	0%
India	0%	0%
Italy	100%	100%
Morocco	39%	0%
Netherlands	99%	100%
Portugal	100%	100%
Spain	100%	100%
Thailand	100%	100%
United Arab Emirates	0%	---
United Kingdom	9.50%	5.78%
United States	39.11%	40.29%

## SAFETY AT WORK

All the Group companies and their respective production plants have an Occupational Hazard Prevention and Management System. This System uses both internal means and external firms, which work together to identify and mitigate risks.

	2024		2023	
	MEN	WOMEN	MEN	WOMEN
No. lost-day injuries <sup>(1)</sup>	139	36	122	54
Frequency rate	19,17	13,20	16,58	19,61
Severity rate	0,54	0,92	0,51	0,42

### Notes:

<sup>(1)</sup> This total includes lost-time injuries of our own workforce occurring on the way to and from work and those occurring at work. The rates were calculated using the following formulas:

- Frequency rate = (total n°, lost time injuries/total no. hours worked) x1000000
- Severity rate = (n°, lost days due to injury/total no. hours worked) x1000

	2024		2023	
	MEN	WOMEN	MEN	WOMEN
Employees with work-related ill health	2	9	0	2

## HOURS OF ABSENTEEISM

The employees of Group companies were absent for a total 418,475 hours in 2024, which is similar to the numbers recorded in the previous year, when absenteeism totalled 389,220 hours.

This includes hours of absenteeism due to non-occupational illness, accidents occurring at work, accidents on the way to and from work, work-related ill health and unjustified absence.

## AVERAGE REMUNERATION

	AVERAGE REMUNERATION BY PROFESSIONAL CATEGORY AND GENDER (€)								
	2024			2023			2022		
	MEN	WOMEN	AVERAGE	MEN	WOMEN	AVERAGE	MEN	WOMEN	AVERAGE
Executives <sup>(1)</sup>	102,413	87,192	<b>94,803</b>	110,126	84,470	<b>97,298</b>	105,423	83,353	<b>94,388</b>
Technical staff & middle management	54,796	52,513	<b>53,654</b>	52,662	46,444	<b>49,553</b>	51,614	50,379	<b>50,997</b>
Administrative & auxiliary staff	36,987	34,826	<b>37,726</b>	33,817	33,749	<b>33,783</b>	37,618	32,128	<b>34,873</b>
Factory employees	37,869	28,605	<b>33,237</b>	30,203	26,461	<b>28,332</b>	28,064	24,560	<b>26,312</b>
Others	28,521	26,527	<b>27,524</b>	27,682	34,344	<b>31,013</b>	31,306	31,195	<b>31,251</b>

**Note:** <sup>(1)</sup> The annual gross average remuneration of the Senior Management was included in the category "Executives" in 2023 and 2022.

It should be noted that Ebrofrost Denmark and Transimpex have not provided information on the remuneration of their employees, so they have not been considered in this indicator.

### Average remuneration of employees by age group (€)

2024			2023			2022		
<= 30	30-50	>= 50	<= 30	30-50	>= 50	<= 30	30-50	>= 50
35,502.79	52,447.75	59,124.31	34,836.00	48,922.00	60,229.00	34,357.00	49,849.00	58,486.00

### Average remuneration of employees by gender (€)

2024		2023		2022	
MEN	WOMEN	MEN	WOMEN	MEN	WOMEN
52,117.16	45,932.74	50,898.00	45,094.00	50,805.00	44,323.00

### Average remuneration of Directors by gender (€ thousand)

2024		2023		2022	
MEN	WOMEN	MEN	WOMEN	MEN	WOMEN
245.00	163.00	254.00	179.00	252.00	178.00

### Average remuneration of Senior Management by gender

2024	
MEN	WOMEN
546,704.90€	132,503.45€

**\*Note:** We only report the average remuneration for 2024 because in earlier years the remuneration of Senior Management was contemplated within the professional category "Executives".

The average remunerations of directors and senior management include variable remuneration, attendance fees, indemnities, payments into long-term saving and retirement schemes and any other amounts disaggregated by gender.

### PAY GAP

The Ebro Group strives to offer equal opportunities, even when neither gender is under-represented within its workforce. However, the Ebro Group has not set any targets to reduce the pay gap or reported how to evaluate it, e.g. disaggregation of pay gap by professional category, by age group, etc.

	2024	2023	2022
Pay gap	0.12	0.11	0.13

**Note:**

(i) We used the following formula to calculate the pay gap: (average remuneration men - average remuneration women)/average remuneration men

### 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 One and Ten 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 2024, the Ebro Group directly paid more than €64,11 million to the tax authorities in the different countries in which it operates, compared to €47.56 million in the previous year.

#### BREAKDOWN OF TAX PAYMENTS (€ THOUSAND)

	2024	2023
Income tax (IT) paid	56,701	41,146

#### TAXES PAID BY GEOGRAPHIC REGIONS

	2024		2023	
	NET IT	OTHERS	NET IT	OTHERS
Spain	(3,028)	455	(21,006)	524
Rest of Europe	39,110	2,927	25,947	2,273
America	18,697	4,011	32,825	3,618
Asia	1,917	22	1,954	0
Africa	5	0	1,426	0
<b>TOTAL</b>	<b>56,701</b>	<b>7,415</b>	<b>41,146</b>	<b>6,415</b>

#### Most significant countries

	2024		2023	
	IT	OTHERS	IT	OTHERS
Spain	(3,028)	455	(21,006)	524
France	9,289	2,429	5,730	1,994
Italy	15,885	444	6,800	279
United States	18,351	3,884	32,991	3,503
United Kingdom	5,788	0	6,199	0

#### PRE-TAX PROFIT, BY REGIONS (€ THOUSAND)

	PRE-TAX PROFIT	
	2024	2023
Spain	12,212	20,369
Rest of Europe	156,480	126,768
America	121,784	113,783
Asia	14,991	9,849
Africa	3,417	3,088
<b>Total</b>	<b>308,883</b>	<b>273,857</b>

### Most significant countries

	PRE-TAX PROFIT	
	2024	2023
Spain	12,212	20,369
France	37,765	22,769
Italy	56,891	48,279
United States	119,568	106,756
United Kingdom	23,851	27,7

### Government grants received (€ thousand)

	2024	2023
Capital grants received	1,417	6,304
Operating grants received	505	1,633

## CORRUPTION AND BRIBERY

### 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 made and received 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.

## ENVIRONMENTAL INFORMATION

### 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 and conserve 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.

DIRECT AND INDIRECT ENERGY CONSUMPTION

TOTAL ENERGY CONSUMPTION	2024		2023	
Direct consumption	3,290,728	77.71%	2,936,080	75.24%
Indirect consumption	943,710	22.29%	966,461	24.76%
Total energy consumption (GJ)	4,234,438	100%	3,902,541	100%
(GWh)	1,176,23		1,084,04	

NOx, SOx AND OTHER SIGNIFICANT AIR EMISSIONS [305-7]

No impacts, risks or opportunities associated with these emissions were identified in our Double Materiality Assessment.

ENVIRONMENTAL NON-COMPLIANCE

In 2024, three plants reported cases of minor non-compliance with environmental laws and regulations, for which they were given small fines, having taken appropriate measures in each case.

COMPANY	PLANT	ENVIRONMENTAL NON-COMPLIANCE	REMEDIAL ACTION	ECONOMIC VALUE (€)
Bertagni	Avio	Failure to present the procedure and outcome of measuring emissions	Carry out measurement and reporting	4,010
Ebro Foods Netherlands	Plant D	Noise complaint from local residents	Noise measurement	0
Herba Ricemills	Los Palacios	Non-compliance with effluent limits and failure to present annual effluent statement	Presentation of effluent statement and sample planning	510

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, the outcomes of audits and inspections have been favourable, and there have been no allegations in the processing of Integrated Environmental Authorisations, etc.



## 5.4. Index under Act 11/2018

In the following table we indicate the pages of this document on which the information required by Act 11/2018 of 28 December on non-financial information and diversity can be found.

INFORMATION REQUIRED BY ACT 11/2018	REFERENCE TO DR (DP) OF CSRD	PAGE
<b>General Information</b>		
A brief description of the business model, which includes the business environment, organisation and structure	(ESRS 2) SBM-1	17-25
Markets in which the organisation operates	(ESRS 2) SBM-1	17-20
Objectives and strategies of the organisation	(ESRS 2) SBM-1 MDR-P MDR-A MDR-T	17-25 46-49
Principal factors and trends that may affect its future evolution	(ESRS 2) SBM-2 SBM-3 IRO-1 IRO-2	25-27 27-34 34-45 45
Reporting framework used	ESRS 1 ESRS 2	5-6
Materiality principle	(ESRS 2) SBM-2 SBM-3 IRO-1 IRO-2	25-27 27-34 34-45 45
<b>Environmental Matters</b>		
Management focus: description and outcome of the policies on environmental matters	(ESRS 2) SBM-1 MDR-P MDR-A MDR-T	17-25 70-71 87-89 93 99-100 102-103 71-74 89-90 94 100 103-104 74-75 90 94-95 100 104-105
<b>DETAILED GENERAL INFORMATION</b>		
Detailed information on the actual and foreseeable impacts of activities on the environment and health	IRO-1 E1-1 E2-1 E3-1 E4-1 E5-1 E2-6 AR (31 b) <sup>1</sup>	67-69 65 70 93 99 102-103

<sup>1</sup> Not applicable



INFORMATION REQUIRED BY ACT 11/2018	REFERENCE TO DR (DP) OF CSRD	PAGE
Environmental certification or assessment procedures	E4-2 AR (17 d) E1-2 E2-2 E3-2 E4-2 E5-2	77
Resources employed to prevent environmental risks	E1-9 E2-5 E3-5 E4-6 E5-6	210
Application of the precautionary principle	E1-9 E2-5 E3-5 E4-6 E5-6	209
Quantity of provisions and guarantees for environmental risks	E1-9 E2-5 E3-5 E4-6 E5-6	210
<b>POLLUTION</b>		
Measures to prevent, reduce or remedy emissions impacting the environment	E2-2	89-90
Including noise and light pollution	E2-2	Not applicable
<b>CIRCULAR ECONOMY AND WASTE MANAGEMENT AND AVOIDANCE</b>		
Waste generated	E5-5 (37a) E5-5 39	107-109 107-109
Actions for waste prevention, recycling, reuse, other forms of recovery and disposal	E5-2 E5-5	103-104 107-109
Actions to combat food waste	E5-2 E5-5	103-204 107-109
<b>SUSTAINABLE USE OF RESOURCES</b>		
Water consumption and supply within local limits	E3-2 E3-4	94 95-96
Consumption of raw materials and actions to improve efficiency	E5-2 E5-4	103-105 105-106
Direct and indirect energy consumption	E1-5 (37) E1-5 (38)	75-77 75-77
Actions taken to improve energy efficiency	E1-2 E1-5	70-71 75-77
Use of renewable energies	E1-5 (37) E1-5 (39)	75-77 75-77
<b>CLIMATE CHANGE</b>		
GHG emissions generated as a result of the company's activities, including use of the goods and services it produces	E1-6	77-85
Measures taken to adapt to the consequences of climate change	E1-1 (SBM-3) E1-3	65-67 71-74
Medium- and long-term reduction targets established voluntarily to reduce GHG emissions and the means implemented to achieve them	E1-1 E1-4	65 74-75
<b>PROTECTION OF BIODIVERSITY</b>		
Actions taken to preserve or restore biodiversity	E4-1 E4-3 E4-5	90 100 Not applicable

INFORMATION REQUIRED BY ACT 11/2018	REFERENCE TO DR (DP) OF CSRD	PAGE
Impacts caused by activities or operations in protected areas	E4-1 (SBM-3)	97-98
	E4-1 (IRO-1)	98
	E4-3	100
	E4-5	Not applicable

## Social and Labour Matters

Management focus: description and outcome of policies on these matters and principal risks related to the issues associated with the Group's activities		17-25
		46-49
	(NEIS 2)	125-126
	SBM-1	142-147
	MDR-P	155-158
	MDR-A	170-173
	MDR-T	127-129
		148
		158
		174

## EMPLOYMENT

Total number and distribution of employees by country, gender, age and professional category	S1-6 (50 a, b) S1-9 (66 b)	
	<p><u>**Total number and distribution of employees by professional category</u></p> <p>The information to be reported under the CSRD does not fit, in form, with the EMP indicators of Act 11/2018, as the breakdown is different and it is not possible to check the same information. The conclusions of the assessment classify this indicator as "partly included in ESRS" because within the CSRD requirements, the indicator "Total number and distribution of employees by professional category" is not one of the group of indicators required by the CSRD.</p>	128 130 200-201
Total number and distribution of types of employment contract and annual average of permanent, contracts, temporary contracts and part-time contracts by gender, age and professional category	The information to be reported under the CSRD does not fit, in form, with the EMP indicators of Act 11/2018, as the breakdown is different and it is not possible to check the same information. CSRD does not require disclosure of the information on annual averages and their breakdown. It only refers to averages in the description of methodologies set out in S1-6 (50 d ii), where it mentions the possibility of using this as a methodology for the calculation and compilation of data to obtain the information.	201-202
Number of dismissals by gender, age and professional category	The information to be reported under CSRD does not require disclosure of the total number of dismissals made or breakdown by gender, age and professional category	203
Average remuneration and evolution, disaggregated by gender, age and professional category, or equal value	The information to be reported under CSRD does not require disclosure of the average remuneration of workers, or evolution of that remuneration disaggregated by gender, age or professional category	206-207
Pay gap, equal pay for equal work, or average in the company	S1-16	133
Average remuneration of directors and executives, including variable remuneration, attendance fees, indemnities, payment into long-term saving and retirement schemes and any other amounts disaggregated by gender	The information to be reported under CSRD does not require disclosure of the average remunerations of directors or executives	206
Implementation of disconnection from work policies		203

INFORMATION REQUIRED BY ACT 11/2018	REFERENCE TO DR (DP) OF CSRD	PAGE
Number of employees with disability	S1-12	131
<b>ORGANISATION OF WORK</b>		
Organisation of working time	S1 (SBM-3) S1-1 S1-8 S1-11 S1-15	112-114 115-121 128-129 Not applicable Not applicable
Number of hours of absenteeism	The information to be reported under CSRD does not require disclosure of the number of hours of absenteeism	205
Actions to facilitate work-life balance and co-responsibility	S1-4 S1-15	125-126 Not applicable
<b>HEALTH AND SAFETY</b>		
Conditions of health and safety at work	S1-1 S1-14	115-121 131-132
Work-related injuries, frequency, severity and work-related ill health	S1-14  The information to be reported under CSRD does not require breakdown by gender of the information on the number of work-related injuries and the formulas used for calculating rates differ from those required by Act 11 / 2018. Nor is disclosure required of the information on the number of cases of work-related ill health	132  205
<b>LABOUR RELATIONS</b>		
Organisation of social dialogue, including procedures to inform, consult and negotiate with the workforce	S1-2 S1-2 AR (24, 25) S1-3 S1-2 AR (28, 29)	122-123 Not applicable 124 122-123
Percentage of employees covered by collective agreements by country	S1-8 S1-8 AR	129-130 129-130
Balance of collective agreements, particularly in the field of health and safety at work	S1-8 S1-14 (88 a)	129-130 131-132
Mechanisms and procedures that the company has to promote employee engagement in the management of the company, in terms of information, consultation and participation	S1-1 S1-2 S1-3	115-121 122-123 124
<b>TRAINING</b>		
Policies implemented in the area of training	S1-1 S1-1 AR (17 a, c, f, h) S1-13	115-121 Not applicable
Total hours training by professional category	The information to be reported under the CSRD does not fit, in form, with the training indicators contemplated in Act 11/2018, as they are disaggregated differently, it does not contemplate breakdown by professional categories and the methodology for calculating hours is not the same (average hours vs total hours)	204-205
<b>UNIVERSAL ACCESSIBILITY</b>		
Universal accessibility by persons with disability	S1-1 AR (17 d) S2-2 (23) S4-2 (21) S4-5 AR (44) S4 (SBM-3 10 c)	131

INFORMATION REQUIRED BY ACT 11/2018	REFERENCE TO DR (DP) OF CSRD	PAGE
<b>EQUALITY</b>		
Measures adopted to promote equal treatment and opportunities between women and men	S1-2 S1-3 S1-4 S1-15 S1-16	133
Equality plans, measures taken to promote employment, protocols against sexual and gender-related harassment	S1-1 (20, 24 a,b,c) S1-1 AR (14, 17 b) S1-17 (102, 103) S1-17 AR (104 b,c)	121-129 134
Integration and universal accessibility of persons with disabilities or different abilities	S1-1 AR (17 d) S2-2 (23) S4-2 (21) S4-5 AR (44) S4 (SBM-3 10 c)	131
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Management focus: description and outcome of the policies related to these matters and the principal related risks	(NEIS 2) SBM-1 MDR-P MDR-A MDR-T	17-25 46-49
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INFORMATION REQUIRED BY ACT 11/2018	REFERENCE TO DR (DP) OF CSRD	PAGE
<b>Anti-Corruption and Anti-Bribery</b>		
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Management focus: description and outcome of the policies related to these matters and the principal risks related with these matters related to the Group's activities	(NEIS 2) SBM-1 MDR-P MDR-A MDR-T	46-49
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BP – 2. Disclosures in relation to specific circumstances

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##### Governance

GOV – 3. Integration of sustainability-related performance in incentive schemes

GOV – 4. Statement on due diligence

GOV – 5. Risk management and internal controls over sustainability reporting

##### Strategy

SBM – 1. Strategy, business model and value chain

SBM – 2. Interests and views of stakeholders

SBM – 3. Material impacts, risks and opportunities and their interaction with strategy and business model

##### Management of impacts, risks and opportunities

IRO – 1. Description of the processes to identify and assess material impacts, risks and opportunities

IRO – 2. Disclosure requirements in ESRS covered by the undertaking's sustainability statement

[MDR-P] Policies of the Ebro Foods Group

### 2. ENVIRONMENTAL INFORMATION

#### GREEN TAXONOMY

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Proportion of CapEx

Proportion of OpEx

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#### ESRS E1 - CLIMATE CHANGE

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GOV-3. Integration of sustainability-related performance in incentive schemes

##### Strategy

E1-1. Transition plan for climate change mitigation

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

##### Management of impacts, risks and opportunities

IRO-1. Description of the processes to identify and assess material climate-related impacts, risks and opportunities

E1-2. Policies related to climate change mitigation and adaptation

E1-3. Actions and resources in relation to climate change policies

##### Metrics and targets

E1-4. Targets related to climate change mitigation and adaptation

E1-5. Energy consumption and mix

E1-6. Gross Scope 1, 2, 3 and Total GHG emissions

E1-7. GHG removals and GHG mitigation projects financed through carbon credits

E1-8. Internal carbon pricing

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List of IROs associated with E2

##### Management of impacts, risks and opportunities

IRO-1. Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

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E2-2. Actions and resources related to pollution

##### Metrics and targets

E2-3. Targets related to pollution

E2-4. Pollution of air, water and soil

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### Management of impacts, risks and opportunities

IRO-1. Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

E3-1. Policies related to water and marine resources

E3-2. Actions and resources related to water and marine resources

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E3-3. Targets related to water and marine resources

E3-4. Water consumption

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SBM-3. Material impacts, risks and opportunities and their interaction with strategy and business model

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IRO-1. Description of processes to identify and assess material biodiversity-related impacts, risks and opportunities

E4-1. Transition plan and consideration of biodiversity and ecosystems in strategy and business model

E4-2. Policies related to biodiversity and ecosystems

E4-3. Actions and resources related to biodiversity and ecosystems

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E4-4. Targets related to biodiversity

## ESRS E5 - RESOURCE USE AND CIRCULAR ECONOMY

List of IROs associated with E5

### Management of impacts, risks and opportunities

IRO-1. Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

E5-1. Policies related to resource use and circular economy

E5-2. Taking action to manage IROs

### Metrics and targets

ES-3. Targets related to resource use and circular economy

E5-4. Resource inflows

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## 3. SOCIAL INFORMATION

### ESRS S1- OWN WORKFORCE

List of IROs associated with S1 (SBM-3)

### Strategy

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

### Management of impacts, risks and opportunities

S1-1. Policies related to own workforce

S1-2. Processes for engaging with own workforce and workers' representatives about impacts

S1-3. Processes to remediate negative impacts and channels for own workforce to raise concerns

S1-4. Taking action to manage IROs

### Metrics and targets

S1-5. Targets related to managing incidents

S1-6. Characteristics of the Undertaking's Employees

S1-8. Collective bargaining coverage and social dialogue

S1-9. Diversity metrics

S1-10. Adequate wages

S1-12. Persons with disabilities

S1-14. Health and safety metrics

S1-16. Remuneration metrics (pay gap and total remuneration)

S1-17. Incidents, complaints and severe human rights impacts

### ESRS S2 - WORKERS IN THE VALUE CHAIN

List of IROs associated with S2 (SBM-3)

### Strategy

SBM-3. Material impacts, risks and opportunities

### Management of impacts, risks and opportunities

S2-1. Policies related to value chain workers



S2-2. Processes for engaging with value chain workers about impacts

S2-3. Processes to remediate negative impacts

S2-4. Taking action to manage IROs

#### Metrics and targets

S2-5. Targets and management of negative impacts

### ESRS S3 - AFFECTED COMMUNITIES

List of IROs associated with S3 (SBM-3)

#### Strategy

SBM-3. Impacts, risks and opportunities

#### Management of impacts, risks and opportunities

S3-1. Policies related to affected communities

S3-2. Processes for engaging with affected communities

S3-4. Taking action to manage IROs

#### Metrics and targets

S3-5. Targets related to managing material negative impacts

### ESRS S4 - CONSUMERS AND END-USERS

List of IROs associated with S4 (SBM-3)

#### Strategy

SBM-3. Impacts, risks and opportunities

#### Management of impacts, risks and opportunities

S4-1. Policies related to consumers and end-users

S4-2. Engagement with customers and consumers

S4-4. Taking action to manage IROs

#### Metrics and targets

S4-5. Targets related managing impacts

## 4. GOVERNANCE

### ESRS G1- BUSINESS CONDUCT

List of IROs associated with GOV-1

#### Governance

GOV-1. The role of the administrative, supervisory and management bodies

#### Management of impacts, risks and opportunities

G1-1. Corporate business conduct policies

G1-2 Management of relationships with suppliers

Taking action to manage IROs

G1-6. Payment practices

## 5. ANNEXES

5.1. Sector-Specific – R&D+I

5.2. List of datapoints in cross-cutting and topical standards that derive from other EU legislation

5.3. Contents of NFRS (according to Act 11/2018)

5.4. Index under Act 11/2018

5.5. Index of ESRS contents

5.6. Group Companies

## 5.6. Group Companies

### LIST OF SUBSIDIARIES OF THE EBRO GROUP

COMPANY	COUNTRY	BUSINESS AREA
Agromeruan, S.A.R.L. AU	Morocco	Rice
Arotz Foods, S.A.	Spain	Others
Arrozeiras Mundiarroz, S.A.	Portugal	Rice
Bertagni 1882, S.P.A.	Italy	Fresh pasta
Ebro Foods Belgium, N.V.	Belgium	Rice
Ebro Foods Netherland, B.V.	Netherlands	Rice
Ebro Foods, S.A.	Spain	Parent (Holding)
Ebro India, Private Ltd.	India	Rice
Ebro Ingredients, B.V.	Netherlands and Belgium	Ingredients
Ebro UK	United Kingdom	Rice
Ebrofrost Denmark, A/S	Denmark	Rice and pasta
Ebrofrost Germany, GmbH	Germany	Rice and pasta
Ebrofrost UK, Ltd	United Kingdom	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 Limited	United Kingdom	Rice
La Loma Alimentos, S.A.	Argentina	Rice
Lustucru Frais, S.A.S.	France	Fresh pasta
Lustucru Premium Groupe	France	Rice and 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 Canada Corporation	Canada	Fresh pasta
Riviana Foods, Inc.	United States	Rice
S&B Herba Foods, Ltd.	United Kingdom	Rice
Santa Rita Harinas, S.L.U.	Spain	Others
Tilda International	United Arab Emirates	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
Agromeruan, SARL AU	Morocco	Coruche	Office (lease)
Arotz Foods, S.A.	Spain	Navaleno	Industrial
Arrozeiras Mundiarroz	Portugal	Coruche	Industrial
		Lisbon	Office (lease)
Bertagni 1882, S.P.A.	Italy	Vicenza (Arcugnano)	Industrial
		Avio	Industrial
		Avio (ex Le Cont)	Warehouses
		Avio (ex Ginos)	
		Arcugnano (via Fermi)	
		Arcugnano (ex Campagnolo)	
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 + Plant D	Industrial
Ebro India, Private Ltd.	India	Taraori	Industrial
		Delhi	Office (lease)
Ebro Frost Denmark, A/S	Denmark	Orbaek	Industrial
Ebrofrost Germany, GmbH	Germany	Offingen	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	
		Verona	
		Villanova Monferrato	
Herba Bangkok, S.L.	Thailand	Nong Khae	Industrial
		Bangkok	Office (lease)
Herba Cambodia, Co. Ltd	Cambodia	Phnom Phen	Industrial
Ebro Ingredients, B.V.	Belgium	Plant B	Industrial
		Plant C	Industrial
		Euro Rice Handling+Plant E	Industrial
		Plant F	Industrial
		Beernem	Office (lease)
	Netherlands	Plant D	Industrial
Herba Ricemills, S.L.U.	Spain	Jerez de la Frontera	Industrial
		Silla	
		Algemesí	
		L'Aldea	
		La Rinconada	
		Los Palacios	
		San Juan de Aznalfarache	
		Coria del Río	
		Isla Mayor	
		Cotemsa	Warehouses
		Raza	
		Ecorub	
Indo European Foods Ltd.	United Kingdom	Felixstowe	Industrial

COMPANY	COUNTRY	WORKPLACE	TYPE OF FACILITY
La Loma Alimentos, S.A.	Argentina	Los Charrúas	Industrial
		Chajari	
		Los Conquistadores	
		Buenos Aires	Office (lease)
Lustucru Frais, S.A.S.	France	St Genis Laval	Industrial
		Lorette	
		Communay	
		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	Gragnano	Industrial
Riceland Magyarorzag, Kft	Hungary	Budapest	Office (lease)
Riviana Foods Canada	Canada	Delta	Industrial
		Hamilton	
		Toronto	Office (lease)
Riviana Foods	United States	Houston	Office (lease)
		Memphis	Industrial
		Carlisle	
		Brinkley	
		Hazen	
		Clearbrook	
		Freeport	
		Alvin	
S&B Herba Foods, Ltd.	United Kingdom	Fullbourn	Industrial
		Regent	
		Orpington	Office (lease)
Santa Rita Harinas, S.L.U.	Spain	Loranca de Tajuña	Industrial
Tilda International	EAU	Dubai	Office (lease)
Tilda, Ltd.	United Kingdom	Classic	Industrial
		Jazz	
Transimpex, Gmbh	Germany	Lambsheim	Industrial
		Lambsheim	Office (owned)