


**CONSOLIDATED NON-  
FINANCIAL AND  
SUSTAINABILITY  
STATEMENT  
2025**



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# **GENERAL INFORMATION**

## ESRS 2 - General Disclosures

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

\*(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 includes the Company and all the subsidiaries that perform its business activities and its value chain, with the same scope of consolidation as the consolidated financial statements at 31 December 2025. Where the scope of information reported for certain indicators does not cover all the undertakings in the consolidation, this is specifically stated.

The above notwithstanding, in 2025 the company Indo European Foods was excluded from the scope of social standards owing to the restructuring of its production activities and its transfer to another Group company during the reporting period, as a result of which it was not possible to have full, comparable social information for the entire year pursuant to Directive (EU) 2022/2464, the Corporate Sustainability Reporting Directive (“**CSRD**”). Consequently, the social indicators of this Statement do not include information on that company separately, although its contribution regarding environmental issues has been considered. This limitation of the scope has been assessed as not material on a consolidated level.

Some of the Group companies do not have own workforce or directly engage in operations. Their purpose is instrumental, consisting of the holding of assets or shares or support for the Group’s corporate and financial structure. For the purpose of the CSRD and the European Sustainability Reporting Standards (“**ESRS**”) adopted under Delegated Regulation (EU) 2023/2772, these undertakings do not generate separate information on operating, labour or environmental impacts. Their contribution to the Sustainability Statement is incorporated on a consolidated level and their importance is assessed exclusively in terms of structure, governance and possible indirect risks.

Based on this reporting scope, the purpose of this Sustainability Statement is to give a comparable, true and fair view of our ESG performance, material risks and opportunities, commitments and results for 2025. The Ebro Group covers the entire value chain, both upstream and downstream. Upstream includes the procurement of agricultural commodities (rice, durum wheat and other ingredients) and auxiliary inputs (packaging, energy, water) and our relations with strategic suppliers, cooperatives and growers. Downstream embraces the distribution and sale of finished products through retail channels, e-commerce, hospitality and industrial clients, including pre- and post-consumption waste management. This cover guarantees the identification and management of impacts, risks and opportunities (“**IROs**”) at all stages of the product’s life cycle.

Following the framework established by the CSRD, this Statement includes the material social, environmental and government issues for the Ebro Group and has been prepared in compliance with the ESRS.

Although the CSRD has not yet been transposed into Spanish law, it is applied as a reference standard alongside Act 11/2018, which remains in force until effective transposition has been made.

The Statement also incorporates the information required under the EU Taxonomy Regulation (Regulation (EU) 2020/852), disclosing how and to what extent the Group's activities are aligned with sustainable economic activities, including the proportion of turnover, CapEx and OpEx associated with those activities. This regulatory framework guarantees the comparability and transparency of the information, on a par with our financial reporting and in line with the expectations of our stakeholders.

The Ebro Group has exercised the option contemplated in ESRS 2 BP-1.5(d) to omit part of the specific information related to intellectual property, technical know-how and certain results of innovation, considering them to be strategic assets, the disclosure of which could compromise our competitive edge. This omission is limited exclusively to data whose publication could jeopardise the Group's trading position and does not affect adequate understanding of the material IROs identified. All the other important information has been reported in full, thus guaranteeing transparency and compliance with the ESRS requirements.

The Ebro Group has opted not to apply the exemption contemplated in Article 19a(3) and Article 29a(3) of Directive 2013/34/EU, amended by the CSRD, and has prepared this Sustainability Statement focusing on disclosing the required information transparently and comprehensively. Consequently, the Group reports the information required by the ESRS to the extent that it is applicable and material, without prejudice to the specific omissions permitted by the regulations when such disclosure could seriously jeopardise their competitive position, and ensuring at all times that said omission is not misleading in respect of understanding the material IROs.

This Statement has been drawn up taking into account the material sustainability matters identified for the Ebro Group, in our own operations and in our upstream and downstream value chain. In this context, the policies, actions and targets described within the document also include value chain information, thus ensuring an integral vision of the IROs associated with the Group's activities.

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

\*(9, 10, 11)

### Definition of time horizons

With regard to the definition of medium- or long-term time horizons, the double materiality assessment (DMA) of the Ebro Group, made in 2024 and revised in 2025, used a different definition of time horizons from that established generally by the CSRD. To be more specific, medium-term is defined as a horizon of up to three years and long-term is a horizon of more than three years. This definition corresponds to the need to align the assessment with the Group's financial planning and corporative business strategy, which are structured in three-year cycles. The use of these time horizons enables a more accurate assessment of the material IROs, without hindering adequate comprehension or the comparability of the information reported.

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 includes metrics with a degree of inherent uncertainty, which, in certain cases, require the use of estimates, especially for the measurement of Carbon Footprint Scope 3 emissions and for long-term projections of climate scenarios. These estimates were based on recognised sources in the sector and methodologies aligned with ESRS 1 DP-90, since it is not feasible that complete primary data can be obtained at all stages of the value chain.

This uncertainty is managed through the application of qualitative criteria and internal validation, ensuring that the estimates comply with sector standards and are consistent with previous years.

No significant changes are anticipated in the short-term methodology, as the present system guarantees traceability and comparability, although it will be reviewed periodically to incorporate any technological and regulatory improvements.

The Group's sustainability officers have implemented internal controls and reviews, supplemented with external audits of the critical indicators, to reinforce reliability.

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.

The presentation format used last year has been maintained and this year, the features of the reporting software have been improved to enhance the quality of the information and make it more comprehensive. Information from other standards or voluntary initiatives is not included.

### **Material errors and corrections**

In 2024, the Ebro Group started implementing the Workiva platform as a tool for consolidating and reporting sustainability information. In 2025, work has continued on its developing, refining the data collection processes and the calculation and validation of the information reported.

As a result of the improved methods, certain data from 2024, published in last year's Statement, have been updated, including the carbon footprint and other environmental indicators. The revised values are included in this Sustainability Statement.

These updates are made exclusively to improve the quality, traceability and accuracy of the information and do not affect adequate comprehension of the Group's performance and the material impacts, risks and opportunities.

### **Use of estimates and enhanced precision**

Although the Ebro Group has improved its systems for collecting and consolidating non-financial information each year, there are still certain metrics which, by nature, are difficult to measure accurately. In these cases, we use estimates based on recognised methodologies coherent with the best practices in the sector.

By way of example, in the case of rice growing by the Agromeruan Group (Morocco), the quantity of water needed to cultivate one hectare is estimated at approximately 12,000 m<sup>3</sup> per campaign, of which around 9,000 m<sup>3</sup> are returned to the land, depending on the agricultural conditions and the rice-growing system used.

The Group continues working to progressively improve the quality and accuracy of these metrics, enhancing the data collection systems and associated internal controls.

**Sources of uncertainty and cases in monetary or quantitative metrics**

The main sources of uncertainty in the quantitative metrics reported are primarily associated with the availability of complete primary data at certain stages of the value chain, especially with regard to Scope 3 emissions and indirect environmental variables.

In these cases, the Group applies cases based on sources of information recognised within the sector and methodologies aligned with the ESRS, guaranteeing the internal consistency of the data and comparability of the data from year to year. The cases used are reviewed periodically as more accurate information becomes available or the methodologies are further developed.

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 y 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 2025 (information as at 31.12.2025):

Director	Category	Committees they are on
Antonio Hernández Callejas <b>Chairman</b>	Executive	Executive Committee (chair)  Strategy and Investment Committee
Demetrio Carceller Arce <b>Vice-Chairman</b>	Proprietary External (Significant shareholder: Sociedad Anónima Damm through Corporación Económica Delta, S.A.)	Executive Committee  Nomination and Remuneration Committee  Strategy and Investment Committee (chair)
Belén Barreiro Pérez-Pardo	Independent External	Nomination and Remuneration Committee

Director	Category	Committees they are on
Meritxell Batet Lamaña	Independent External	Executive Committee  Audit, Control and Sustainability Committee
María Carceller Arce	Proprietary External (Significant shareholder: Sociedad Anónima Damm through Corporación Económica Delta, S.A.)	-----
José Ignacio Comenge Sánchez-Real	Proprietary External (Significant shareholder: through Mendibea 2002, S.L.)	Strategy and Investment Committee
Mercedes Costa García <b>Lead Independent Director</b>	Independent External	Nomination and Remuneration Committee (chair)  Audit, Control and Sustainability Committee
Javier Fernández Alonso	Proprietary External (Significant shareholder: Corporación Financiera Alba, S.A.)	Executive Committee  Audit, Control and Sustainability Committee  Strategy and Investment Committee
Javier Gómez-Trenor Vergés	Proprietary External (Significant shareholder: Empresas Comerciales e Industriales Valencianas, S.L.)	-----
Félix Hernández Callejas <sup>(1)</sup>	Executive (Significant shareholder: Heralianz Investing Group, S.L.)	Strategy and Investment Committee

Director	Category	Committees they are on
Blanca Hernández Rodríguez	Proprietary External (Significant shareholder: Grupo Tradifín, S.L.)	Nomination and Remuneration Committee
Alejandra Olarra Icaza	Proprietary External (Significant shareholder: Corporación Financiera Alba, S.A.)	-----
Elena Segura Quijada	Independent External	Audit, Control and Sustainability Committee (chair)  Nomination and Remuneration 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.

Belén Barreiro Pérez-Pardo stepped down as member of the Audit, Control and Sustainability Committee on 29 April 2025 for professional reasons.

On 30 April 2025, Meritxell Batet Lamaña was appointed member of the Audit, Control and Sustainability Committee to fill the vacancy produced by the resignation of Barreiro Pérez Pardo.

(2) Félix Hernández Callejas was appointed Director, nominated by the significant shareholder Herculanz Investing Group, S.L., which he represents on the Board. In accordance with the Capital Enterprises Act Article 529 duodecies.1, he is classified as an Executive Director by virtue of his status as executive and director and as he performs management duties in some of the subsidiaries of the Ebro Foods Group, although he has not been assigned any executive duties in the Company.

(3) 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 2025 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 2025, 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 14.29% of the 14 members.
- 8 Directors are classified as proprietary, equivalent to 57.14% of the 14 members.
- 4 Directors are classified as independent, equivalent to 28.57% of the 14 members.

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

At year-end 2025 there were 7 women on the Board of Directors (the gender least represented on this body), equivalent to 50% of the total 14 members, of whom:

- 4 are classified as independent, so 100% of that category are women
- 3 are classified as proprietary, so 37.50% of that category are women

No women were classified as Executive Directors.

At year-end 2025, the numbers of women on the Board Committees were as follows:

- 1 woman on the Executive Committee, representing 25% of the total members (4) of this Committee
- 4 women on the Nomination and Remuneration Committee, representing 80% of the total members (5) of this Committee
- 3 women on the Audit, Control and Sustainability Committee, representing 60% of its total members (5)

There are no women on the Strategy and Investment Committee.

Finally, of the 9 senior executives of Ebro Foods, S.A. (14 in the entire Ebro Group) 4 are women, representing a proportion of 44.44% of the top management of the Company and 28.57% 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/2026/02/2026.02.04-Resena-profesional.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 58, the Board has Directors aged between 40 (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 Communications and Corporate 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 TOWARDS 2030" ([RUMBO A 2030](#)).

The strategy established by the Board of Directors and developed by the Communications and Corporate 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 Communications and Corporate 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 2025, the Communications and Corporate

Social Responsibility Department attended two Audit, Control and Sustainability Committee meetings to report on:

- Sustainability Statement 2024: highlighting the challenges of drawing it up and the progress achieved by the Group in respect of social responsibility and sustainability.
- Enhanced features of the non-financial reporting software: describing the work to be done in 2025 to optimise the capacities of the tool used (Workiva).
- Progress made during 2024 with respect to the targets set in the three pillars of the Sustainability Plan "[HEADING TOWARDS 2030](#)": people, planet and health through food.

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, the Group's highest governance body, has established the general principles for the integration of sustainability in business management through the Sustainability, Environment and Corporate Social Responsibility policy. Those principles include, among others:

- Ethical management and compliance
- Minimising economic, social and environmental risks
- Respect for and protection of human rights
- Ensuring compliance with sustainable standards throughout the value chain
- Environment conservation and promotion of responsible practices

These principles are applied across the board in strategic decision-making, ensuring that the Group's investments and projects are assessed on the basis not only of their financial yield, but also their social, environmental and governance impact, in keeping with the ESG commitments and targets of the Plan "[HEADING TOWARDS 2030](#)".

The material IROs are an essential element of the decision-making process at all levels of corporate governance, according to their respective specific competence. At the highest level, the Board of Directors analyses the strategic investments, taking into consideration both the financial indicators (NPV, IRR, pay-back) and the material non-financial aspects, including

ESG risks, sustainability opportunities and the outcome of the double materiality assessment. This integration ensures that corporate decisions are determined by economic criteria and the environmental, social and governance commitments established in the Group's Sustainability, Environment and Corporate Social Responsibility Policy.

During 2025, 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 and its impact in the Group, in respect of which the work carried out by the Risks Committee within the Action Plan on risk control has been supplemented with the information reported directly to the Audit, Control and Sustainability Committee by the verifier of the Sustainability Statement.
- Assessment of the recommendations submitted by the verifier for improvement and reinforcement in the non-financial statement.
- Monitoring and implementation of measures to enhance the prevention of damage deriving from climate-related catastrophes in the light of the damage caused by the COL (cut-off low) in Valencia in 2024.
- Formalisation of our commitment to the SBTi (Science Based Targets initiative) and commencement of work to design the Herba Ricemills decarbonisation plan, which will serve as a pilot project for subsequent implementation in the other subsidiaries during 2026.
- Increasing food safety controls.

The work done during 2025 by the Internal Audit Department within its review of the Non-Financial and Sustainability Statement 2024 is also worth mentioning. Within that work, apart from reviewing the quantitative information included in the 2024 Statement, the Internal Audit Department analysed the measures put in place or in progress to improve the reporting processes, environmental management and technological operations (implementation of improvements to the Workiva platform).

### **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, in 2024 the Audit, Control and Sustainability Committee 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 IROs. 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.

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

\*(29)

The top tier executives of the Group, including the Executive Chairman and the Chief Operating Officer (COO), participate in the Long-Term Bonus Scheme tied to the Strategic Plan 2025-2027, which maintains the integration of sustainability-related non-financial targets in the remuneration policy. A portion of the variable bonus (6.25% of the total bonus for the three-year period) is tied to the degree of achievement of certain ESG targets defined in the Plan "[HEADING TOWARDS 2030](#)".

The Nomination and Remuneration Committee defines those targets and the portion of the bonus tied to them, giving priority to objective, verifiable targets. At the end of the three-year period, the degree of achievement is assessed together with other financial targets (EBITDA and EBITDA-CAPEX), guaranteeing the integration of sustainability in the Group's remuneration policy and corporate strategy.

In this context, the Long-Term Bonus Scheme in place in 2025 is tied to the Strategic Plan 2025-2027. A detailed description can be found in the current Directors' Remuneration Policy and in the Annual Reports on Directors' Remuneration at (<https://www.ebrofoods.es/informacion-para-accionistas-e-inversores/gobierno-corporativo/remuneraciones-de-los-consejeros/>).

The non-financial targets contemplated in this Scheme are tied to the following goals:

- Zero waste
- Homologation of a 100% recyclable doy-pack with guarantees equivalent to existing ones
- Reduction of water consumption and effluent
- Increase in the use of renewable energies
- Due diligence in the supply chain in Pakistan, India and Southeast Asia

### GOV – 4. Statement on due diligence

The Board of Directors of the Ebro Group, through the Audit, Control and Sustainability Committee, oversees the management of sustainability-related IROs, including the due

diligence processes in the value chain. Through this oversight the Group ensures that the identified ESG risks are integrated in the corporate strategy and in key decision-making.

Every three or six months the Committee reviews the reports issued by the Risks Committee and the Sustainability Department, which include:

- Results of the double materiality assessment
- Assessment of risks related to human rights, environment and governance
- Progress in supplier audits and remediation plans (included in the Sustainability Report)

Key performance indicators (KPIs) are also analysed, such as:

- Proportion of suppliers audited under international standards (essentially SMETA).
- Number of critical impacts managed and resolved
- Degree of achievement of targets of the Plan "[HEADING TOWARDS 2030](#)".

The Group applies an approach based on international standards (OECD, UN Guiding Principles) and sector frameworks, ensuring the traceability and sustainability of raw materials. When adverse impacts are detected, the Committee supervises the implementation of remedial measures and collaboration with strategic partners.

Finally, governance ensures transparency through the annual publication of progress in due diligence and sustainability, verified by internal and external auditors, thereby enhancing trust among our stakeholders.

## 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 TOWARDS 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 Units 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 statements.

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, sustainable business model.

**Business model**

The Ebro Group operates through a portfolio of 85 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 78 sites, including production plants, offices and warehouses.

List of countries with commercial and industrial presence

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

### List of the main countries with only commercial presence

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

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 6,854 professionals, 5,937 of whom are employed directly by the company, 26 are independent contractors and 891 are hired 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. Workers	
	2025	2024
Employees	5,937	5,667
Supervised workers	891	942
Independent contractors	26	27
<b>Total headcount</b>	<b>6,854</b>	<b>6,636</b>

*\*Note: The total headcount differs from the number indicated in the Consolidated Annual Accounts due to differences in the reporting scope, since the subsidiary Indo European Foods is not included in the ESRS S1 indicators and supervised workers and independent contractors are included here that are not taken into account in the financial reporting.*

Continent	Type of Worker	No. Workers	
		2025	2024
Africa	Employees	230	209
	Supervised workers	2	2
	Independent contractors	0	0
<b>Africa</b>		<b>232</b>	<b>211</b>
Asia	Employees	492	489
	Supervised workers	261	211
	Independent contractors	6	6
<b>Asia</b>		<b>759</b>	<b>706</b>
Europe	Employees	3,606	3,446
	Supervised workers	513	620
	Independent contractors	20	21
<b>Europe</b>		<b>4,139</b>	<b>4,087</b>
North America	Employees	1,375	1,302
	Supervised workers	115	109
	Independent contractors	0	0
<b>North America</b>		<b>1,490</b>	<b>1,411</b>
South America	Employees	234	222
	Supervised workers	0	0
	Independent contractors	0	0
<b>South America</b>		<b>234</b>	<b>222</b>
	<b>Total headcount</b>	<b>6,854</b>	<b>6,636</b>

Business Area	2025			2024		
	Men	Women	Total	Men	Women	Total
Rice	3,133	1,138	<b>4,271</b>	2,885	1,045	<b>3,930</b>
Pasta	997	548	<b>1,545</b>	1,041	578	<b>1,619</b>
Holding	36	24	<b>60</b>	37	24	<b>61</b>
Others	39	22	<b>61</b>	37	20	<b>57</b>
<b>Total Employees</b>	<b>4,205</b>	<b>1,732</b>	<b>5,937</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.

The integration of sustainability in the Group's corporate strategy is also reflected in our products, conceived to provide value, not only from an economic point of view, but also from a social and environmental standpoint. The company steers its development towards solutions that respond to consumer expectations, guarantee quality and safety standards and contribute towards eating responsibly. Our products are thus crucial to our sustainable strategy, bolstering the coherence between business management and commitment to people's well-being and the environment.

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 TOWARDS 2030](#) guides the Group's actions throughout its entire value chain: from the field to the table, from production to consumer experience.

HEADING TOWARDS 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.sedexglobal.com/es/">https://www.sedexglobal.com/es/</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)*
- *World Benchmarking Alliance (UN)*

## **Business environment and consumer trends in 2025**

In 2025, the global economy demonstrated greater resilience than expected against the backdrop of high trade tensions, greater uncertainty in economic policies and a complex geopolitical environment. Global growth was around 2.7%, sustained by adaptation of the supply chains, more favourable financial conditions in the second half of the year and the thrust of investment linked to digitalisation and artificial intelligence.

By geographical areas, United States maintained strong growth, underpinned by the strength of consumption and, especially, by buoyant business investment associated with digital technologies. The European Union recorded a more moderate trend, hampered by the weak German economy and a still fragile industrial environment, although partly offset by the improvement in private consumption and the progressive stabilisation of inflation. Within the eurozone, economies such as Spain's performed relatively well, with growth rates above the European average.

Inflation continued along a path of gradual moderation, approaching the targets of the central banks, while the monetary policy began a process of progressive relaxation, especially in Europe. However, the economic environment is still exposed to uncertainty deriving from the evolution of international trade, financial volatility and geopolitical tensions.

The consumer environment was characterised during the year by a high level of precaution, deriving from the cumulative impact of inflation on households' purchasing power. Although inflationary pressures have eased from the maximums in earlier years, the prices of food and certain services remained high, influencing purchasing decisions.

In this context, hard discount and private label brands take the limelight, boosted by greater price sensitivity and rationing of the shopping basket. This dynamic drives competition for shelf space and requires an especially careful management of pricing and the value perceived by consumers.

At the same time, market surveys confirm that despite restraint in everyday spending, consumers are still clearly inclined to channel their consumption through socialising, recreation and convenience food. Hospitality and consumption outside the home hold firm, supported by the search for experiences and proposals that combine practicality, pleasure and quality. Technological developments and social changes continue to accelerate the transformation of purchasing habits across the board and the constant need for companies operating in the sector to adapt.

From a structural point of view, the main consumer trends revolve around personalised consumer experience, health and well-being, sustainability, pleasure and price. Consumers now have greater access to information and tools for comparison, as a result of which shopping behaviour has become more selective and reflexive. Customisation is still a differential element, although its importance is increasingly influenced by consumers' perception of value and the final price of the product.

Different intentions overlap when choosing the shopping basket: the demand for healthy, sustainable products coexists with the need for convenience and enjoyment, prioritising some properties or others depending on where and when the products are to be consumed. Sustainability, fully integrated in the market discourse, is increasingly approached more pragmatically, with a limited willingness to pay significantly higher prices.

Moreover, population and social changes, such as the ageing population, smaller households, increased mobility and cultural diversity still have a bearing on eating habits and forms of consumption. At the same time, the consolidation of new distribution channels and formats, the growth of e-commerce and the growing role of digital channels and social networks are transforming sales points, both physical and digital, being consolidated as a key strategic factor.

Digitalisation and artificial intelligence are becoming cross-cutting levers to optimise processes, enhance operating efficiency and adapt supply to constantly evolving consumer habits.

*Note: The information on the macroeconomic context, consumer environment, market evolution and the Group's results are set out in greater detail in the Business Evolution and Results section of the consolidated Management Report.*

**Financial metrics**

In 2025, the Group's net turnover was €3,013.5 million, 4% less than in 2024. Our Adjusted EBITDA grew by 1.8% year on year to €420.6 million. Net profit was up 3.4% on 2024, at €214.8 million, and net debt stood at €529.3 million, €63.8 million less than at year-end 2024.

Details by business areas

(€ thousand)	RICE	PASTA
<b>SALES</b>	2,326,028	690,256

SBM – 2. Interests and views of stakeholders

\*(45)

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

- Shareholders
- Customers, consumers and distributors
- Employees
- Suppliers
- Society (Government, NGO's and other institutions)
- Media

Continuous dialogue with all its stakeholders enables the Group to: (i) gain an insight into their needs and expectations, enabling it to anticipate their demands, (ii) 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., (iii) identify opportunities and develop strategies aligned with sectoral trends, (iv) meet market demands and (v) 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
	Corporate 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
Corporate whistleblowing channel	
Customers, consumers and distributors	Corporate website and websites of our subsidiaries
	Customer services department

Stakeholders	Dialogue Channels
	Electronic mailboxes in each of the Group companies
	Parent company mailbox (comunicacion@ebrofoods.es)
	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
	Corporate 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
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 (comunicacion@ebrofoods.es)
	Meetings with NGOs and social action institutions
	Meetings with local authorities
	Meetings with resident associations
	Corporate whistleblowing channel
Media	Corporate website and websites of our subsidiaries
	Corporate Communications Department
	Parent company mailbox (comunicacion@ebrofoods.es)
	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.

As a result of these interactions, no amendments were made in 2025 to the strategy or business model of the Ebro Group. The opinions of our stakeholders have been taken into account to boost and prioritise lines of action already integrated in the corporate strategy and the Sustainability Plan HEADING TOWARDS 2030.

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, the Ebro Group identified 47 IROs out of a total of 259 IROs assessed.

The list of material IROs is set out in the following table:

## E1 Climate Change

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

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

## E2

### Pollution

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

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.	+	A
Pollution of effluent through own operations of pasta and rice production.	-	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.	-	P

## E3

### Management of Water Resources

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

Increase in water stress due to water withdrawal in areas of water stress, both in crop-growing areas and at production plants.	-	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

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

Creation of agricultural habitats with high ecological value (wetlands, habitats of protected species, etc.)	+	P
Land degradation and loss of soil properties as a result of intensive farming practices in the suppliers' sourcing areas.	-	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

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

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.	+	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.).	+	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

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

<b>Working Conditions</b>		
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
<b>Training and Skills Development</b>		
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
<b>Diversity and Inclusion</b>		
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
<b>Promotion of Human Rights</b>		
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

## S2

### Workers in the Value Chain

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

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

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

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

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

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		
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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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## GOV-1

### Management of Relationships with Suppliers

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

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.: Forética 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

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

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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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 and 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**

None of the material risks and opportunities identified had a material financial impact for the Group in 2025.

The phase-in provisions contemplated in ESRS 1, Appendix C was applied 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.

There were no changes in the material IROs identified in 2025 in respect of those identified in the previous year.

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

\*(53)

The Double Materiality Assessment (DMA) is a key tool for understanding the Group's current situation regarding sustainability and to define action plans to promote real improvements. The process applied starts with identification of the material topics and ends with assessment of all the IROs identified, considering all the Group's important assets.

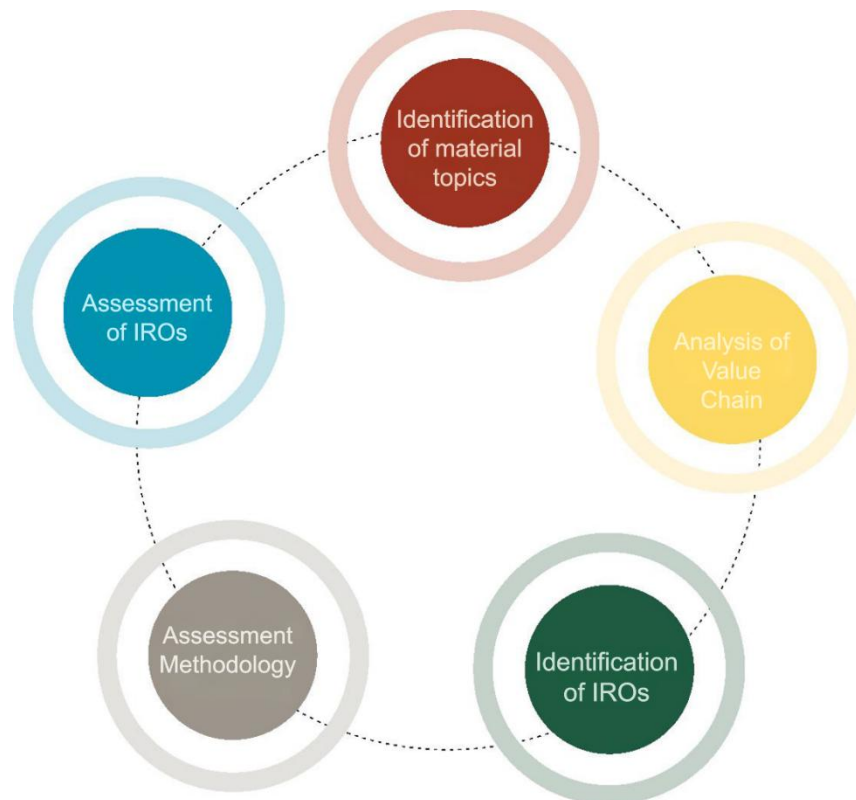
Each stage of this process was designed in accordance with the requirements established by the CSRD, guaranteeing a rigorous approach aligned with prevailing legislation.

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.

**Figure1. Integral assessment process**



## **1. Identification of material topics**

The material topics were identified and prioritised through an integral diagnosis that included analysing internal and external documentation, stakeholders' expectations, sector-specific trends and ESG impacts associated with the activity.

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 IROs 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 TOWARDS 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 expectations of the reporting 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 (SAI)
  - 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 analysed were:
- 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 2. 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 IROs 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 3. 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 IROs, 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**

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**

<b>TOPIC</b>	<b>IROs IDENTIFIED</b>
E1 – Climatic change	21
E2 – Pollurtion	14
E3 – Water and marine resources	10
E4 – Biodiversity and ecosystems	17
E5 – Circular economy	15
S1 – Own workforce	48
S2 – Workers in he value chain	34
S3 – Affected communities	17
S4 – Consumers and end-users	35
G1 – Bussines conduct	38
Sector specific: Innovation and Digitisation	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 IROs that actually applied to the Group and its value chain.

Dependencies

When identifying the risks and opportunities, 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. The severity is calculated as the average of the measurements of scale, remediation and scope. Several aspects are assessed within each of these dimensions, on a scale of 1 to 4, where 4 is the highest level and 1 is the lowest.
- For potential negative impacts, we assessed the likelihood of occurrence mapped onto the relevant time horizon.
- For actual positive impacts, the criteria of magnitude 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, in order to determine whether the impact is material or not, it is not always necessary to assess in depth each of the criteria of severity, based on the Group's specific facts and circumstances. 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, where 4 is 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 4. Outline of the methodology used for the assessment of positive impacts**

SCORE	SCALE		SCOPE		LIKELIHOOD	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	Correction factor (When the impact will have most likelihood of occurrence) Short term: +0 Medium term: -0.25 Long term: -0.5	Critical Points > 3.4 Material Points = [2.5-3.4] Not material Points < 2.5
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 on 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		50%		4		50%	
				+		= 3.88	

**Figure 5. 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	Correction factor (When the impact will have most likelihood of occurrence) Short term: +0 Medium term: -0.25 Long term: -0.5	Critical Points > 3.4 Material Points = [2.5-3.4] Not material Points < 2.5
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 highest score is taken of environmental (4), social(1) and possible remediation (2) = 4		Average = 3.5		3		-0.25		
Average = Scale (4) and Scope (3.5) = 3.83				2.75				
2.89		50%		2.75		50%		
				+		= 2.82		

**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

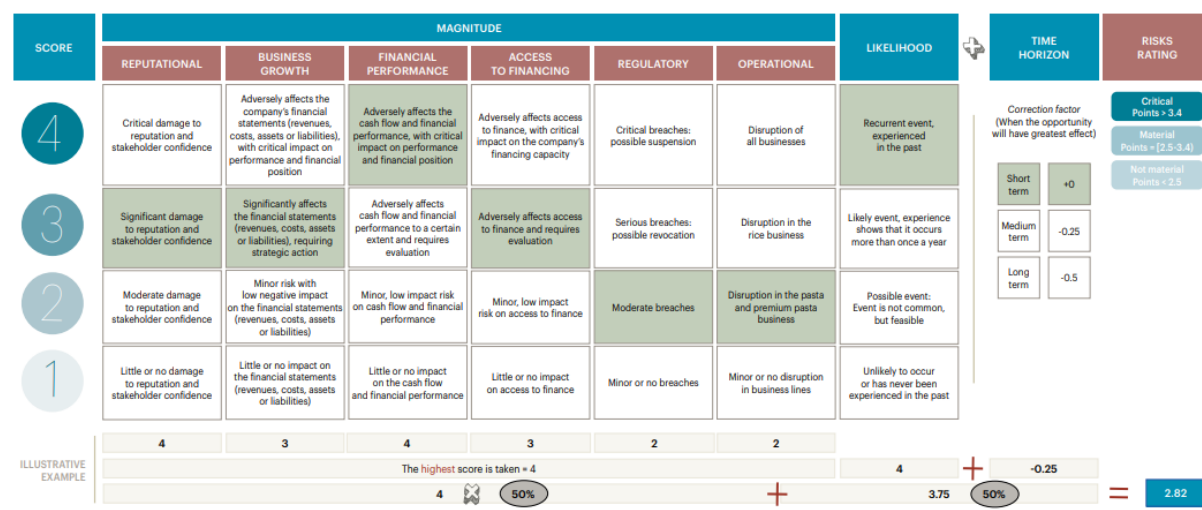
To ensure that the assessment of risks and opportunities adequately reflected their impact on the Group and prevent dilution or distortion, the highest rating was taken of the different metrics rated. The rating thus prioritised the aspect with the greatest potential impact within each category, ensuring 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:
  - i. Short term (less than 1 year): 0 points
  - ii. Medium term (1 to 3 years): -0.25 points
  - iii. 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 6. Outline of the methodology used for the assessment of risks



## 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 (DMA), the Group decided to segregate those risks into a separate category, including a few other risks detected in the DMA (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 corporate governance structure described in the Annual Report, with the participation of Management Committees, Risks Committee and Audit, Control and Sustainability Committee. This system guarantees periodical oversight, monitoring of internal controls and consistency with the global risk management policy.

There were no changes in the identification, assessment and management of risks in respect of the previous year.

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

\*(56)

The material information to be disclosed on the material IROs was determined according to the outcome of the Group's 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 DMS made by the Group, the requirements established in ESRS E1 (Climate Change) were considered material. The assessment determined that both the impacts deriving from the Group's 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:

Policy	Link	Associated Standard	Key points	Scope of Application	Approved by	Oversight & implementation
<b>Code of Conduct of the Ebro Foods Group</b>	<a href="#">Code of Conduct</a>	<b>E2 S1 S3 S4 G1</b>	<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>
<b>Supplier Code of Conduct of the Ebro Foods Group</b>	<a href="#">Supplier Code of Conduct</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

<p><b>Social Policy of the Ebro Foods Group</b></p>	<p><a href="#">Social Policy</a></p>	<p><b>S3 S4</b></p>	<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>	<p>Ebro Group Ebro Foundation</p>	<p>Board of Directors</p>	<p>Board of Directors  Annually: AGM</p>
<p><b>Sustainability, Environment and Corporate Social Responsibility Policy of the Ebro Foods Group</b></p>	<p><a href="#">Sustainability, Environment and Corporate Social Responsibility Policy</a></p>	<p><b>E1 E2 E3 E4 E5 S1 S2 S3 S4 G1</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>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> <ul style="list-style-type: none"> <li>i. social well-being, diversity, environmental balance and social and economic progress; and</li> <li>ii. tax responsibility, respect for human rights and prevention of corruption and other illicit conduct.</li> </ul> <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>	<p>Ebro Group Ebro Foundation</p>	<p>Board of Directors</p>	<p>Audit, Control and Sustainability Committee  Communication and Corporate Social Responsibility Department</p>
<p><b>Policy against Corruption and Bribery of the Ebro Foods Group</b></p>	<p><a href="#">Policy against corruption and bribery</a></p>	<p><b>G1</b></p>	<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> <ul style="list-style-type: none"> <li>a. bribery, illegal commissions, influence peddling and money laundering;</li> <li>b. acceptance or offering of gifts and courtesies;</li> <li>c. dealings with authorities, regulatory bodies and government agencies; and</li> <li>d. social action and/or sponsorship activities.</li> </ul> <p>The Policy also indicates what conduct is prohibited in these areas.</p>	<p>Ebro Group Ebro Foundation</p>	<p>Board of Directors</p>	<p>Audit, Control and Sustainability Committee</p>

<p><b>Risk Control and Management Policy of Ebro Foods, S.A.</b></p>	<p>Intranet; this Policy is private and is only available for employees of the Ebro Group</p>	<p><b>G1</b></p>	<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>	<p>Ebro Group</p>	<p>Board of Directors</p>	<p>Board of Directors Audit, Control and Sustainability Committee Risks Committee Internal Audit Department</p>
<p><b>Policy on the internal reporting system and whistleblower protection of the Ebro Foods Group</b></p>	<p><a href="#">Policy on the internal reporting system and whistleblower protection</a></p>	<p><b>S1</b></p>	<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>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> </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>	<p>Ebro Group Ebro Foundation</p>	<p>Board of Directors</p>	<p>Oversight: Chair of the Audit, Control and Sustainability Committee  System Administrator: Secretary of the Board of the Company</p>
<p><b>Policy on the Selection of Directors and Diversity in the Composition of the Board of Directors of Ebro Foods S.A.</b></p>	<p>Intranet; this Policy is private and is only available for employees of the Ebro Group</p>	<p><b>S1</b></p>	<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>• A balanced composition of the Board is sought, favouring gender diversity, with a view to maintaining a significant representation of the gender least represented, in line with the applicable laws and regulations and the best good governance practices.</li> </ul>	<p>Board of Directors</p>	<p>Board of Directors</p>	<p>Nomination and Remuneration Committee</p>

<p><b>Remuneration Policy for Directors of Ebro Foods, S.A.</b></p>	<p><a href="#">Remuneration Policy for Directors</a></p>	<p><b>S1</b></p>	<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>	<p>Board of Directors</p>	<p>General Meeting of Shareholders</p>	<p>Nomination and Remuneration Committee</p>
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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**

# EU Taxonomy

## Regulatory context

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 Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020, on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (the "**Taxonomy Regulation**").

The Taxonomy Regulation establishes six environmental objectives:

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. 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:

1. It must contribute substantially to one or more of the six environmental objectives.
2. It must not significantly harm any of the environmental objectives.
3. It must be carried out in compliance with the minimum (social) safeguards laid down in Article 18 of the Taxonomy Regulation.
4. It must comply with 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 (Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 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 climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives) (the "**Climate Delegated Act**").

On 6 July 2021, the European Commission adopted Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation. This document specifies the content, methodology and presentation of the information to be disclosed by financial and non-financial undertakings. Under this Delegated Regulation, undertakings must disclose the proportion in which their activities are taxonomy-eligible and taxonomy-aligned through the three key performance indicators (KPIs): turnover, capital expenditure or investment in fixed assets (CapEx) and

operating expenditure (OpEx), and the accounting policy used to report how the three KPIs have been determined and assigned to the numerator.

On 9 March 2022, the European Commission adopted Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 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 Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 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. On the same date, it also adopted Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 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.

On 8 January 2026, the European Commission adopted Commission Delegated Regulation (EU) 2026/73 of 4 July 2025 amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives. This Regulation introduces changes in the content and format of the Taxonomy information that can be applied voluntarily in 2025, to clarify the disclosure requirements and simplify presentation of the indicators. During this first year, the Ebro Group has decided to apply the new Regulation in the presentation of the results of its Key Performance Indicators (KPIs) explained in this chapter.

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

### [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 2025 non-financial undertakings must report on:

- The eligibility and alignment of the economic activities contemplated in the Climate Delegated Act

- The eligibility of the new activities contemplated in the Environmental Delegated Act and the amendment to the Climate Delegated Act
- The eligibility and alignment of the activities contemplated in the Climate Delegated Act and the activities contemplated in Delegated Regulation (EU) 2021/2178 and the amendment to the Climate Delegated Act

In line with these reporting obligations, in 2025 the Social Responsibility, Sustainability and Finance departments of Ebro Foods, 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 Act:

- 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

### 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 are unable to 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 to 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.

- **Sustainable use and protection of water and marine resources**

For high-efficiency combined cooling, heat and power (CCHP) cogeneration from fossil gaseous fuels, in order to meet the general criteria established in Appendix B to Annex I of the Climate Delegated Act, environmental degradation risks related to preserving water quality and avoiding water stress must be identified and addressed. However, the Company did not identify such risks in 2025.

- **Transition to a circular economy**

Although neither of the two activities analysed is obliged to meet the DNSH criteria, the Company 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 combined cooling, heat and power (CCHP) cogeneration 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. It was not possible to confirm these criteria in 2025.

- **Protection and restoration of biodiversity and ecosystems**

High-efficiency combined cooling, heat and power (CCHP) cogeneration 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. In 2025, it was not possible to make this assessment.

### 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. For this purpose the Company 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 Company 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 chapters “5. Human Rights in the value chain” and “6. Anti-corruption and bribery measures” of this Statement. In addition our Group, directed by those responsible for taxation, monitor

legislation and possible interpretations, requesting specific reports from specialists when necessary.

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.
- It has not been possible to meet the requirement 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 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. KPIs related to turnover of Annex I to the Commission Delegated Regulation (EU) 2021/2139.

#### 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 to 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 by the company or a third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets (denominator).

According to point 1.1.3.2 of Annex I to the Disclosures Delegated Act, where the operating expenditure is not material for the business model of non-financial undertakings, those undertakings shall:

- a) be exempted from the calculation of the numerator of the OpEx KPI in accordance with point 1.1.3.2 and disclose that numerator as being equal to zero;
- b) disclose the total value of the OpEx denominator calculated in accordance with point 1.1.3.1;
- c) explain the absence of materiality of operational expenditure in their business model.

In 2025, the Ebro Group analysed the eligible proportion of its operating expenditure associated with the economic activities included in the Climate Regulated Act (€421.7 thousand associated with cogeneration and photovoltaic panels), which was 0.43% of the total OpEx in 2025 (€97,689 thousand). Consequently, it has been determined that the OpEx KPI is not material.

## General table

2025		Breakdown by environmental objectives of Taxonomy-aligned activities													
KPI (1)	Total (2)	Proportion of Taxonomy-eligible activities (3)	Taxonomy-aligned activities (4)	Proportion of Taxonomy-aligned activities (5)	Climate change mitigation (6)	Climate change adaptation (7)	Water (8)	Pollution (9)	Circular economy (10)	Biodiversity (11)	Proportion of enabling activities (12)	Proportion of transitional activities (13)	Activities not assessed considered not material (14)	Taxonomy-aligned activities in previous financial year (N-1) (15)	Proportion of Taxonomy-aligned activities in previous financial year (N-1) (15)
Turnover	€3,013,559 thous.	0%	€0 thousand	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	€0 thousand	0%
CapEx	€151,021 thous.	1.18%	€0 thousand	0%	0%	0%	0%	0%	0%	0%	0.77%	0.41%	0%	€0 thousand	0%
OpEx	€97,689 thous.	0.43%	€0 thousand	0%	0%	0%	0%	0%	0%	0%	0.02%	0.41%	0%	€0 thousand	0%

## Proportion of CapEx

CapEx													
2025													
Economic activities (1)	Code (2)	Taxonomy-eligible KPI (Taxonomy-eligible proportion of CapEx) (3)	Taxonomy-aligned KPI (Monetary value of CapEx) (4)	Taxonomy-aligned KPI (Taxonomy-aligned proportion of CapEx) (5)	Environmental objectives of Taxonomy-aligned activities						Enabling activities (12)	Transitional activities (13)	Taxonomy-aligned proportion of Taxonomy-eligible (14)
					Climate change mitigation (6)	Climate change adaptation (7)	Water (8)	Pollution (9)	Circular economy (10)	Biodiversity (11)			
<i>High-efficiency combined cooling, heat and power from fossil gaseous fuels</i>	CCM 4.30	0.41%	€0 thousand	0%	0%	0%	0%	0%	0%	0%		T	0%
<i>Installation, maintenance and repair of renewable energy technologies</i>	CCM 7.6	0.77%	€0 thousand	0%	0%	0%	0%	0%	0%	0%	F		0%
<b>Sum of alignment by objective</b>					0%	0%	0%	0%	0%	0%			
<b>Total KPI (CapEx)</b>		1.18%	€0 thousand	0%	0%	0%	0%	0%	0%	0%	0.77%	0.41%	0%

## Proportion of OpEx

OpEx													
2025													
Economic activities (1)	Code (2)	Taxonomy-eligible KPI (Taxonomy-eligible proportion of OpEx) (3)	Taxonomy-aligned KPI (Monetary value of OpEx) (4)	Taxonomy-aligned KPI (Taxonomy-aligned proportion of OpEx) (5)	Environmental objectives of Taxonomy-aligned activities						Enabling activities (12)	Transitional activities (13)	Taxonomy-aligned proportion of Taxonomy-eligible (14)
					Climate change mitigation (6)	Climate change adaptation (7)	Water (8)	Pollution (9)	Circular economy (10)	Biodiversity (11)			
<i>High-efficiency combined cooling, heat and power from fossil gaseous fuels</i>	CCM 4.30	0.41%	€0 thousand	0%	0%	0%	0%	0%	0%	0%		T	0%
<i>Installation, maintenance and repair of renewable energy technologies</i>	CCM 7.6	0.02%	€0 thousand	0%	0%	0%	0%	0%	0%	0%	F		0%
<b>Sum of alignment by objective</b>					0%	0%	0%	0%	0%	0%			
<b>Total KPI (OpEx)</b>		0.43%	€0 thousand	0%	0%	0%	0%	0%	0%	0%	0.02%	0.41%	0%

# ESRS E1 - Climate change

## List of IROs associated with E1

Impacts, Risks and Opportunities						
Code	Description	Impact	VCh	Time horizon	Policies associated with IRO	
<b>Climate Change</b>						
IP-02a	Contribution to mitigation of the effects of climate change through the promotion of carbon sinks associated with sustainable agriculture practices.	I+	A	Up	Present	Sustainability, Environment and Corporate Social Responsibility Policy
IP-02b	Adaptation to climate change through the promotion of sustainable agriculture projects.	I+	A	Up	Present	
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	Up OO Down	Present	Sustainability, Environment and Corporate Social
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	Up	Present	
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	Up OO Down	Medium term	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	Up OO	Short term	
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	Up OO Down	Short term	Sustainability, Environment and Corporate Social Responsibility Policy  Rick Control and Management Policy
R-03	Increase in costs associated with changes to emission allowances and new regulations,	R	A	Up OO	Short term	

	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.			Down		
<b>Energy</b>						
IP-04	Conservation of non-renewable energy resources and reduction of 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	OO	Present	
IP-05	Reduction of pressure on energy infrastructures and improvement of the energy resilience of the production system as a result of implementing energy saving practices (changing conventional lights to LED, energy saving project, improved energy efficiency, etc).	I+	A	OO	Present	Sustainability, Environment and Corporate Social Responsibility Policy

<b>KEY: Impact</b>
I+: Positive Impact
I-: Negative Impact
O: Opportunity
R: Risk
P: Potential
A: Actual

<b>KEY: Value Chain (VCh)</b>
Up: Upstream
OO: Own Operations
Dow: Downstream

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

\*(13)

The information on the integration of sustainability-related performance in the investment schemes is set out in section GOV-3 of ESRS 2 – Governance, since the contents are common and cross-cutting, applicable to all the sustainability topics.

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

\*(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.

On 2 October 2025, the Group formalised its commitment to decarbonisation of its own operations and those of its value chain through the *Science Based Targets* (SBTi) platform. This Near-Term commitment (it can be viewed through this [link](#)) entails reducing emissions with a time horizon of 5-10 years, according to the Paris Agreement, and the goal of +1.5°C.

The commitment acquired embraces both emissions from direct operations and those of our value chain. The Group is working on the definition of a global Decarbonisation Plan. As its first milestone, the Herba Ricemills (Spain) Decarbonisation Plan has been developed for

Scopes 1 and 2 and approved by Management, and will serve as the basis for subsequent rollout on a Group level.

The Herba Ricemills Decarbonisation Plan contemplates a set of levers and actions to reduce emissions, including:

- Installation of photovoltaic plants:
  - New installation at the Jerez plant; scheduled to come on stream in 2027
  - Enlargement of the existing installation at La Rinconada plant; scheduled to come on stream in 2027
- Replacement of the natural gas (fossil fuel) used in combustion processes with biomethane, a gas with guarantee of renewable origin (GO):
  - Purchase of biomethane as from 2030, since it is not yet commercially available in Spain
- Purchase of renewable electricity:
  - In 2025, 26% of our electricity consumption was GO-energy
  - Progressive increase to 100% by 2035
- Energy efficiency measures: individual projects to improve the efficiency of our plants and reduce the consumption of natural gas and/or electricity:
  - Energy efficiency project at the Jerez and La Rinconada plants, involving the recirculation of hot water from autoclaves to pre-heat boiler water. Scheduled to start up in 2027

Through these actions, we estimated that by 2035 Herba Ricemills will have reduced its Scope 1 and 2 emissions by approximately 63% from 2024 levels. This estimate may be adjusted when the Group's global Decarbonisation Plan is defined. The degree of progress of the plan will be monitored annually.

At the same time, the Group is analysing the feasibility of additional decarbonisation levers, such as the electrification of processes or the use of hydrogen as a fuel, to be assessed on a Group level.

### SBM-3 Impacts, risks and opportunities

\*(18,19)

All the sustainability matters considered material for the Group were identified and evaluated in the DMA. The list of material IROs in 2025 includes those related to climate change in both own and value chain operations.

(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 associated with greenhouse gas emissions deriving from the Group's direct activity (production) and from its value chain (from purchase of agricultural raw

materials to transport). In this context, an adequate use of soil and the promotion of sustainable agriculture practices are key to mitigation as they can generate positive impacts and opportunities for product differentiation.

The Group's industrial activity is not energy-intensive, except in certain product lines that require freezing or pre-cooking of the raw material. In this framework, the Group is developing its Climate Action Plan to comply with the Near-Term commitment undertaken with SBTi.

## **Principal material risks related with climate change**

The principal risks related to climate change are classified into physical risks and transition risks:

- 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, particularly rice and wheat, generating limitations in supply.

These limitations can take the form of higher prices at source, increased needs for financing of inventories and potential impacts on the Group's margins, depending on its ability to pass those increased costs onto its customers. Moreover, in certain sourcing areas where rice is a basic source of nutrition, when it is in short supply exports may be prohibited or restricted.

The business model of the Ebro Group favours mitigation of these physical risks 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.

- Transition risks: increased costs deriving from regulatory changes, especially those associated with European carbon pricing mechanisms, such as the Carbon Border Adjustment Mechanism (CBAM). This can generate material impacts on the Group's financial strategies, requiring further adaptations and additional investments to comply with the new environmental regulations.

For the initial assessment of these 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. They were all identified as not material, as the remediation and mitigation measures implemented (specific regulatory compliance plans, limited exposure to energy and an adequate product portfolio) were considered very robust.

However, our DMA revealed a clear need to consider the possible 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. These risks are currently pending quantitative assessment.

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

## 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 the corresponding analysis of strengths and weaknesses. 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 climate-related impacts, risks and opportunities

\*(20,21)

All sustainability matters considered significant for the Group were identified and assessed in the DMA Climate-related aspects were included in the list of material IROs in 2025 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. For this reason, in 2023, the Group analysed the climate risks and opportunities under the reference framework of the Task Force on Climate-related Financial Disclosures (TCFD), which was completed in 2024 with the DMA on sustainability. This process has enabled us to incorporate the physical and transition risks deriving from climate change in the Group's risk management system.

The analysis covered the rice and wheat sectors, considering both the processing plants and the principal warehouses as well as the sourcing areas of these commodities in Spain and throughout our value chain. In particular, 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 IPPC, 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.

Changes in precipitation and temperature patterns are the most significant physical risks in these scenarios, but even so, their risk level for the business is moderate. In both cases, crop yield is directly affected, as is, consequently, the producers' selling price. There are also other possible factors deriving from the crop being the main source of nutrition in some of the sourcing areas, so a shortage of supply can lead to the prohibiting or limiting of exports, especially in Southeast Asia.

The useful life of the Ebro Group's assets falls within the time horizons established in the analysis of physical climate risks, except in the case of buildings, which have a longer useful life. The analysis of physical climate risks concludes that no risks are material in respect of the Ebro Group facilities. The Group also has liability insurance that covers all the companies in the Group, including those situated in areas of moderate risk, such as the Gulf of Mexico, which is exposed to hurricanes and flooding. These companies have also developed contingency and prevention plans to minimise impacts on their facilities.

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.

The high costs associated with the energy transition required and the possible changes in demand by end consumers are the transition risks with the greatest impact of all those assessed, although they are still classified with a low final risk level.

When making the DMA 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 factors taken into account for analysing the physical climate risks were:

- Saltwater intrusion in aquifers and sourcing areas
- Crop pests due to global warming
- Flooding
- Frequency and intensity of extreme weather events: gale-force winds, severe cold snaps, hail, sea storms
- Frequency and intensity of wildfires

The most significant physical risks are changes in precipitation and temperature patterns.

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)

<b>Sustainability, Environment and Corporate Social Responsibility Policy</b>	
<b>MDR-P 65(a)</b>	<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>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b></p> <p>Ebro Group</p>
<b>MDR-P 65(c)</b>	<p><b>Most senior level accountable for implementation:</b></p> <p>The Board of Directors is the body responsible for its approval.</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>-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>
<b>MDR-P 65(e)</b>	<p>When drawing up and updating this Policy, the interests and expectations of the Group's main stakeholders were taken into account, identified through the usual channels of relationship and dialogue, and the outcome of the sustainability material assessments, which incorporate environmental, social and governance aspects, including climate change.</p>
<b>MDR-P 65(f)</b>	<p><b>Availability:</b></p> <p>The Policy is available on the Group's corporate website (<a href="#">Política-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a>).</p>

Risk Control and Management Policy	
<b>MDR-P 65(a)</b>	<p><b>Contents:</b> 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>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b> Ebro Group</p>
<b>MDR-P 65(c)</b>	<p><b>Most senior level accountable for implementation:</b> The Board of Directors is the body responsible for its approval.</p>
<b>MDR-P 65(d)</b>	<p><b>Disclosure of third-party standards or initiatives to which Group commits:</b> -Section 529 ter Corporate Enterprises Act (LSC) -Principle 24 of the Code of Good Governance of the National Securities Market Commission (CNMV)</p>
<b>MDR-P 65(e)</b>	<p>This Policy was defined taking account of the expectations of our significant stakeholders regarding the adequate identification, assessment and management of the Group's risks, including risks associated with climate change, through existing governance and control mechanisms and the results of risk analyses and materiality assessments made by the Group.</p>
<b>MDR-P 65(f)</b>	<p><b>Availability:</b> The Policy is available on the Group's different intranets, available exclusively for Group employees.</p>

These 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 Group developed the following decarbonation actions in 2025:

MDR-A: Climate change-related actions and resources in own operations							
ACTION		SCOPE	COMPANY	HORIZON	CAPEX (€ 000)	OPEX (€ 000)	CAPEX 2026 & later (€ 000)
Renewable energy	Work on photovoltaic plant	OO	Bertagni	Long term	23	2	
Renewable energy	Work on photovoltaic plant	OO	Ebro Ingredients	Long term	282		

Renewable energy	Work on photovoltaic plant	OO	Mundiriso	Long term	370	6	1,392
Renewable energy	Work on photovoltaic plant	OO	Arroceiras Mundiarroz	Long term	252		98
Renewable energy	Work on photovoltaic plant	OO	Ebro Frost UK	Long term	214		
Renewable energy	Work on CHP and photovoltaic plant	OO	Garofalo	Long term	642	284	4,808
Renewable energy	Maintenance photovoltaic plant	OO	Herba Ricemills	Long term		6	3,320
Renewable energy	Maintenance photovoltaic plant	OO	Ebro India	Long term		10	
Renewable energy	Maintenance CHP plant	OO	Ebro Frost Germany	Long term		70	
Renewable energy	Maintenance CHP plant	OO	Geovita	Long term		44	
Energy efficiency	Recirculation hot water from autoclaves for preheating boiler water	OO	Herba Ricemills	Long term			550
Energy efficiency	New, more efficient dryer for flour extrusion line, with an estimated reduction of 60% in electricity consumption	OO	Ebro Ingredients	Long term	600		
Energy efficiency	Packaging cutter replacements for efficiency	OO	Riceland	Long term	16		
Energy efficiency	New, low-consumption pasteuriser in fresh pasta line	OO	Lustucru Frais	Long term	493		117
Energy efficiency	Improvements & optimisation electricity control panels	OO	Tilda Ltd	Long term	273		216
Energy efficiency	Update compressor for lower consumption	OO	Tilda Ltd	Long term	30		
Energy efficiency	Change lighting system to LED	OO	Tilda Ltd	Long term	60		
Measurement carbon footprint	SBT consultancy work	OO	Lustucru Frais	Short term		50	
Measurement carbon footprint	Carbon footprint measurement	OO	Bertagni	Short term		7	
<b>TOTAL</b>					<b>3,256</b>	<b>479</b>	<b>10,501</b>

KEY: Scope
Up: Upstream
OO: Own operations
Down: Downstream

Note: The amount of investment indicated in the above table is part of the total investments made by the Group, indicated in Note 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 the enabling activity 4.30 (high-efficiency CCHP cogeneration from fossil gaseous fuels) and represent 1.18% of the investments made in 2025.

In this context, the most important investments made during the year were in:

- Renewable energy: new photovoltaic plants in Ebro Frost UK, Ebro Ingredients and Arroceiras Mundiarroz; enlargement/work on existing photovoltaic plants in Mundiriso, Pastificio Lucio Garofalo and on the CCHP cogeneration plant in Pastificio Lucio Garofalo.
- Energy efficiency: highlighting a new dryer for the flour extrusion line in Ebro Ingredients and a new, low-consumption pasteuriser in Lustucru Frais.

During 2025 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 €422 thousand (recurrent expenses);
- 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 DMA, in a sum of €57 thousand.

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

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 underway to invest in photovoltaic plants at the rice producing subsidiaries in Spain and Italy, and at the dry pasta plant in Gragnano (Italy), where an investment in cogeneration is also in progress. These investments should be developed as from 2026 in a sum not yet fully defined, but estimated at around €10 million.

Herba Ricemills is estimated to have reduced its carbon footprint in 2025 by 2,039 tCO<sub>2e</sub>, as a result of buying electricity with guarantee of renewable origin. This calculation is made following the methodology described in the SBTi standard. We have no methodology to calculate current/future emission reductions in the other Group companies until we have defined the Global Decarbonisation Plan.

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

As described below in MDR-A, during 2025 the Group continued working on research and promotion projects on environmentally sustainable crop practices applicable to the rice crop in its principal sourcing areas, investing a sum of €2,092 thousand. The Group finances these campaigns or promotes best practices by rewarding the growers participating in these programmes with better purchase prices for their crops. Depending on the type of programme, the required expenditure is recognised as increased cost of procurement or operating expense in the income statement of the accompanying consolidated annual accounts.

The Group has 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.

The principal sustainable agriculture programmes developed by the Group in its value chain during 2025 were:

MDR-A: Climate change-related actions and resources in our value chain.						
Sustainable Agriculture Programmes						
	ACTION	SCOPE		COMPANY	HORIZON	OPEX (€ 000)
Oryzonte	Reduction use of water through implementation of AWD Reduction of GHG emissions SRP verification	Spain	UP	Herba Ricemills	Long term	33  41
FSA/PI	Integrated Production / FSA					*
SRP Verification	SRP verification Certified seed Laser levelling AWD Reduction of water consumption	Pakistan	UP	Herba Ricemills	Long term	*

**MDR-A: Climate change-related actions and resources in our value chain.**

**Sustainable Agriculture Programmes**

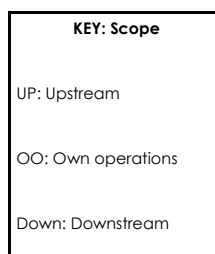
Organic Program	NOP (National Organic Program, USDA) and NPOP (National Programme for Organic Production, India) Organic Certification, which guarantees the integrity of organic agricultural products, prohibiting synthetic pesticides, transgenic organisms (GMO) and promoting sustainable practices	India	UP	Ebro India	Long term	12
Organic & Fair Trade Program	Organic Certification Fair For Life Certification (Fair trade and social responsibility)		UP	Ebro India	Long term	87
SRP Verification	Training in best practices Reduction pesticides		UP	Ebro India	Long term	137
Control Farming	LMR compliance Certified seed Laser levelling					939
Control Farming - AWD (CFT)	AWD Reduction water consumption					437
Control Farming - (FR)	Biological pest control Reduction GHG emissions					*
FSA verification	FSA verification	Italy	UP	Mundiriso	Long term	17
Green Climate Fund (Thai Rice: Strengthening Climate-Smart Rice Farming) & SRP program	Reduction GHG emissions Climate smart crop technologies and practices Training in best practices Increased productivity of water Raise number of women in agriculture Reduction GHG emissions SR verification	Thailand	UP	Herba Bangkok	Long term	362
Organic farming	Organic certification	Argentina	UP	La Loma Alimentos	Long term	1
SRP	SRP verification	Argentina	UP	La Loma Alimentos	Long term	25

**MDR-A: Climate change-related actions and resources in our value chain.**

**Sustainable Agriculture Programmes**

ARVA USA - Regenerative Agriculture	Provides guidance for growers on the implementation of regeneration practices and technology to quantify the reduction of CO <sub>2</sub> e emissions attributable to regeneration practices	USA	UP	Riviana Foods	Long term	*
Soil Capital Carbon programme	Reduction GHG emissions Organic fertilisation Use of cover crops Crop rotation Tillage reduction	France	UP	Lustucru Frais	Long term	*
					<b>TOTAL</b>	<b>2,092</b>

\* OpEx not material



We highlight:

- The project developed by Tilda and Ebro India, started in 2021, to encourage basmati rice growers to implement Alternate Wetting and Drying (AWD) techniques in their rice paddies. In 2025, this project reached more than 1,500 small growers, who manage around 9,000 hectares. The main results achieved were:
  - o CO<sub>2</sub>e emissions were reduced by 13.96 million kg, which is equivalent to taking 19,250 cars off the roads in the United Kingdom for one year.
  - o Water consumption for irrigation was reduced by 14,490 million litres, which is equivalent to the annual consumption of 279,550 adults in the UK.
  - o Electricity consumption was reduced by 3.56 million kWh, equivalent to the annual consumption of 1,318 homes in the UK.
  - o The use of fertilisers was lowered by 9.4% per ha and 16.8% per tonne of rice, on average, and the use of plant health products was cut by two-thirds on farms.
  - o Growers achieved an average increase of 2.9% in their annual revenue and an increase of 8.9% in production, compared with farms not participating in the programme, which proves that environmental and economic sustainability can progress hand in hand.
  
- Through the Oryzonte project, developed in Seville with 89 growers, the AWD technique was implemented in 1,636 ha and emissions were cut by 23% (6,071 tCO<sub>2</sub>e).

In both projects, the methodology of the Intergovernmental Panel on Climate Change (IPCC) was applied and the Cool Farm Tool was used to measure the reduction of emissions.

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

The Group's ability to impact the emission reduction targets will ultimately depend on the quantity of resources assigned to its Decarbonation Plan. At present, the Group does not have a global Decarbonisation Plan in place to estimate the aggregate financial resources needed to achieve it.

Until that Plan has been approved, the Group continues working on specific initiatives that entail expenditure and investment in both 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 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 2027, according to the times established by SBTi.

### **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.
- There is continuous tracking and support of the growers participating in the sustainable agriculture projects. Field visits are made, by employees (as in the case of Ebro India) or project implementation firms (as in the cases of the Oryzonte Project in Spain and Green Climate Fund in Thailand. External audits (SRP and/or FSA sustainable rice certification) may also be made and annual progress reports issued.
- Level of ambition and indicators used: The level of ambition is aligned with the Near-Term commitment acquired with SBTi, with the Paris Agreement and the decarbonisation goal of +1.5°C for Scopes 1 & 2 and +2°C for Scope 3.

#### 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 Mundiriso
  - 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
- Total energy consumption from nuclear sources

Consumption of energy from non-renewable sources				
Energy consumption and mix	2025	%	2024	%
(1) Fuel consumption from coal and coal products (MWh)	0	0 %	0	0 %
(2) Fuel consumption from crude oil and petroleum products (MWh)	12,075	1 %	11,419	1 %
(3) Fuel consumption from natural gas (MWh)	802,637	71 %	824,456	72 %
(4) Fuel consumption from other fossil sources (MWh)	7,927	1 %	6,738	1 %
(5) Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	247,514	22 %	252,369	22 %
<b>(6) Total energy consumption from fossil sources (MWh)</b>	<b>1,070,153</b>	<b>94 %</b>	<b>1,094,982</b>	<b>95 %</b>
Percentage of fossil fuels in the total energy consumption (%)	94 %	0 %	95 %	0 %
<b>(7) Consumption of nuclear energy (MWh)</b>	<b>0</b>	<b>0 %</b>	<b>0</b>	<b>0 %</b>
Percentage of consumption of nuclear sources in the total energy consumption (%)	0 %	0 %	0 %	0 %
Consumption of energy from renewable sources				
(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)	24,750	2 %	23,111	2 %
(9) Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	31,992	3 %	22,423	2 %
(10) Consumption of self-generated non-fuel renewable energy (MWh)	7,118	1 %	7,539	1 %
<b>(11) Total renewable energy consumption (MWh)</b>	<b>63,860</b>	<b>6 %</b>	<b>53,073</b>	<b>5 %</b>
Percentage of renewable sources in the total energy consumption (%)	6 %	0 %	5 %	0 %
<b>Total energy consumption (MWh)</b>	<b>1,134,014</b>		<b>1,148,055</b>	

Note: 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.

90% of the data on energy consumption in own operations reported by the Group companies was obtained from invoices or direct measurement.

11% of the electricity consumed is from renewable sources, according to the contractual agreements reached by the following companies with their suppliers for the plants indicated below, 69% of which are Generator Declarations (UK) for fuel mix disclosure and 31% are guarantees of origin (EU).

- S&B: Fullbourn and Regent
- Tilda: Classic and Jazz
- Transimpex: Lambsheim

- Ebro Frost UK: Beckley
- Herba Ricemills: San Juan de Aznalfarache

E1-6-AR 45-(d)	2025		2024	
Contractual Instruments Scope 2 (market) - MWh				
	Total (MWh)	% of Scope 2	Total (MWh)	% of Scope 2
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	247,514	89 %	252,369	92 %
<b>Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)</b>	<b>31,992</b>	<b>11 %</b>	<b>22,423</b>	<b>8 %</b>
Renewable Energy Certificate (US, Canada, Australia)	0	0 %	0	0 %
Generator Declarations (UK) for fuel mix disclosure	21,985	69 %	21,987	98 %
Guarantees of Origin (EU)	10,007	31 %	436	2 %
Electricity contracts (PPA) that also convey RECs or GOs	0	0 %	0	0 %
Others	0	0 %	0	0 %

In 2025, 3.4% of the total energy consumed by the Group was self-generated in its photovoltaic (PV) and cogeneration (CG) facilities:

- Arotz: Navaleno (PV)
- Bertagni: Avio, Vicenza (PV and CG)
- Ebro Frost Germany: Offingen (PV and CG)
- Ebro Frost UK: Beckley (PV)
- Ebro India: Taraori (PV)
- Ebro Ingredients: Plant F (PV)
- Geovita: Bruno (PV), Villanova Monferrato (CG)
- Herba Bangkok: Nong Khae (PV)
- Herba Ricemills: Algemesi and La Rinconada (PV)
- Mundi Riso: Vercelli (PV)
- Pastificio Lucio Garofalo: Gragnano (PV and CG)
- Riviana Foods: Colusa (PV)
- Transimpex: Lamsheim (PV)

Energy generated from renewable sources (MWh)				
	2025	%	2024	%
Self-generated electricity - Photovoltaic	7,148	0.63%	7,551	0.66%
Energy generated from non-renewable sources (MWh)				
	2025	%	2024	%
Self-generated electricity - Cogeneration	31,839	2.81%	32,801	2.86%
<b>Total (MWh)</b>		<b>3.4%</b>		<b>3.5%</b>

Energy intensity			
Energy intensity per net revenue	2025	2024	% 2025 / 2024
Total energy consumption	1,134,014	1,148,055	-1 %
Net revenue (€ thousand)	3,013,559	3,140,493	-4 %
Energy intensity (MWh/€ thous net revenue)	0.38	0.37	3 %

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 2025 was €3,013.6 million. 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,b,53,55)

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

The methodology used to calculate the carbon footprint in Scopes 1, 2 & 3 is the GHG Protocol. The emission factors are periodically updated.

For **Scopes 1 & 2** of the Group-level carbon footprint, the methodology used is calculation, taking 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, SF<sub>6</sub> and NF<sub>3</sub>.

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)
- 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

Exclusions:

- All the leased offices (16) are excluded from the scope of the Group's indirect emissions and energy consumption reporting as no data are available and the emissions are negligible (less than 2%). The data for the 2 owned offices (Lustucru Premium Group office in Lyon and Transimpex office in Lambsheim) are included.
- The emissions deriving from reloading of cooling gas are excluded as those emissions are negligible in the total Scope 1 emissions (less than 6% in the estimated worst case). The largest consumers in the Group are the frozen foods companies (Ebro Frost), which use ammonium as a coolant, which has a global warming potential (GWP) of 0, so its emissions are nil. The other companies only reload office air-conditioning equipment or similar.

### **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 2024)
- Emission factors of coolants from MITERD v.29 and DEFRA 2024

The categories included in the calculation of Group-level **Scope 3** emissions 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: (i) upstream emissions from the purchase of fuels; (ii) upstream emissions from the purchase of electricity; and (iii) 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 EbroSur. 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 methanisation) 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 2024 (the 2025 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			
	2025	2024	Variation	% 2025 / 2024
<b>Scope 1 GHG emissions</b>				
<b>Gross scope 1 GHG emissions (tCO<sub>2</sub>e)</b>	<b>172,704</b>	<b>177,218</b>	<b>-4,514</b>	<b>-3 %</b>
Percentage of Scope 1 GHG emissions from regulated emission trading systems (%)	0	0	0	0 %
<b>Scope 2 GHG emissions</b>				
<b>Gross location-based scope 2 GHG emissions (tCO<sub>2</sub>e)</b>	<b>84,880</b>	<b>82,605</b>	<b>2,275</b>	<b>3 %</b>
<b>Gross market-based scope 2 GHG emissions (tCO<sub>2</sub>e)</b>	<b>82,674</b>	<b>88,815</b>	<b>-6,142</b>	<b>-7 %</b>
<b>Significant Scope 3 GHG emissions</b>				
<b>Gross total indirect scope 3 GHG emissions (tCO<sub>2</sub>e)</b>	<b>6,102,167</b>	<b>6,419,009</b>	<b>-316,843</b>	<b>-5 %</b>
1 Purchased goods and services	4,825,821	5,177,253	-351,432	-7 %
2 Capital goods	28,520	30,974	-2,453	-8 %
3 Fuel- and energy- related activities (not included in scope 1 or scope 2)	42,783	43,370	-587	-1 %
4 Upstream transportation and distribution	271,131	295,985	-24,854	-8 %
5 Waste generated in operations	5,476	6,751	-1,275	-19 %
6 Business travel	548	774	-226	-29 %
7 Employee commuting	4,925	4,352	573	13 %
9 Downstream transportation	337,267	324,139	13,128	4 %
10 Processing of sold products	38,715	40,208	-1,493	-4 %
11 Use of sold products	373,293	309,073	64,220	21 %
12 End-of-life treatment of sold products	13,732	13,900	-168	-1 %
15 Investments	159,955	172,232	-12,276	-7 %
Total GHG emissions				
<b>Total GHG emissions (location-based) (tCO<sub>2</sub>e)</b>	<b>6,359,865</b>	<b>6,678,856</b>	<b>-318,991</b>	<b>-5 %</b>
<b>Total GHG emissions (market-based) (tCO<sub>2</sub>e)</b>	<b>6,357,639</b>	<b>6,685,070</b>	<b>-327,431</b>	<b>-5 %</b>

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

The percentage of Scope 3 emissions calculated from the primary data is 8.2%, compared to 8.6% in 2024.

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	2,441	1,753	1,753	472,227	476,421	476,421
Belgium	597	2,504	1,929	692,662	695,763	695,188
Cambodia	18	291	192	134,802	135,111	135,012
Canada	3,260	1,722	1,722	105,381	110,364	110,364
Denmark	1,625	1,317	5,200	36,774	39,716	43,598
France	0	0	0	26,773	26,773	26,773
Germany	6,825	1,621	3,376	363,489	371,936	373,691
Hungary	4,608	586	360	81,896	87,091	86,865
India	0	-	-	23,759	23,759	23,759
Italy	364	7,420	7,420	380,624	388,408	388,408
Morocco	29,999	7,062	9,352	609,483	646,544	648,834
Netherlands	7,213	2,661	2,661	95,578	105,452	105,452
Portugal	2,776	4,499	1,535	18,486	25,760	22,797
Spain	377	888	754	119,772	121,037	120,903
Thailand	16,202	9,962	7,890	1,028,682	1,054,845	1,052,774
United Arab Emirates	93	1,497	1,555	850,815	852,405	852,463
United Kingdom	3,644	5,066	762	632,982	641,692	637,387
United States	92,662	36,106	36,269	1,943,396	2,072,165	2,072,328
<b>Total</b>	<b>172,704</b>	<b>84,956</b>	<b>82,731</b>	<b>7,617,580</b>	<b>7,875,241</b>	<b>7,873,015</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	2025	2024
<b>Total Scope 1 Biogenic CO<sub>2</sub> emissions (tCO<sub>2</sub>e)</b>	<b>9,439</b>	<b>8,904</b>

See E1-5 for details of contractual elements from renewable sources, since this requirement has been calculated with the MWh data instead of emissions data, as 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 (E1-6-AR 46-(j))

E1-6-AR 46-(j)	2025	2024
<b>Scope 3 Biogenic CO<sub>2</sub> emissions</b>		
Rice husk	0	0
Wood chips	97	107
<b>Total Scope 3 Biogenic CO<sub>2</sub> emissions (tCO<sub>2</sub>e)</b>	<b>97</b>	<b>107</b>

CO <sub>2</sub> Emissions Intensity - Location-based	2025	2024	% 2025 / 2024
Total GHG missions (location-based)	6,359,865	6,678,856	-5 %
Net revenues (€ thousand)	3,013,559	3,140,493	0
<b>Total GHG Emissions Intensity (location-based) (tCO<sub>2</sub>e/€ thousand)</b>	<b>2.11</b>	<b>2.13</b>	<b>-1 %</b>
CO <sub>2</sub> Emissions Intensity - Market-based	2025	2024	% 2025 / 2024
Total GHG missions (market-based)	6,357,639	6,685,070	-5 %
Net revenues (€ thousand)	3,013,559	3,140,493	-4 %
<b>Total GHG Emissions Intensity (market-based) (tCO<sub>2</sub>e/miles €)</b>	<b>2.11</b>	<b>2.13</b>	<b>-1 %</b>

The net turnover in 2025 was €3,013.6 million. 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

As indicated in section E1-3, during 2025 Lustucru Frais launched a sustainable agriculture project in durum wheat with growers in France. At the closing date of this statement, we are analysing whether this requirement is applicable, in which case it will be reported next year.

### 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		VCh	Time Horizon	Policies associated with IRO
<b>Pollution</b>						
IP-08	Improvement of soil quality, water and biodiversity in agricultural sourcing areas by reducing exposure of the environment to substances of concern or substances of very high concern, thanks to 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	Up OO	Present	Sustainability, Environmental and Corporate Social Responsibility Policy Code of Conduct Supplier Code of Conduct
IN-06	Generation of greenhouse gas emissions deriving from the Group's activities throughout the value chain, through changes of land use, if any, in the agricultural activities, and in emissions from transport and production activities, through the consumption of fossil fuels by stationary and mobile sources.	I-	P	OO	Short term	Sustainability, Environmental and Corporate Social Responsibility Policy
IN-08	Greenhouse gas emissions associated with purchases made in the Group's supply chain (emissions associated with the procurement of rice and raw materials used in the production of pasta), and emissions produced through changes in land use, if any, in agricultural activities.	I-	P	Up	Short term	

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

KEY: VCh
Up: 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 IROs identification process 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 TOWARDS 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.

All the sites of the Group and our value chain were taken into account, although without making an exhaustive assessment of particular issues and locations.

No material risks and opportunities were identified in connection with this topic. The impacts identified as material in the DMA 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).

## E2-1. Policies related to pollution

\*(14,15a,c)

The Ebro Group addresses sustainability across its food chain through its Sustainability, Environment and Corporate Social Responsibility Policy, the Group Code of Conduct and the Supplier Code of Conduct and promotes 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 Sustainability, Environment and Corporate Social Responsibility Policy guides the company's processes, activities and decisions, to protect the environment and prevent and minimise environmental impacts. This Policy does not expressly list the substances of concern or substances of very high concern.

<b>Sustainability, Environment and Corporate Social Responsibility Policy</b>	
<b>MDR-P 65(a)</b>  <b>E2-1; 15</b>	<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 guide the organisation's processes, activities and decisions to protect the environment and prevent and minimise our environmental impacts.</p> <p>Monitoring and oversight fall within the remit of the Audit, Control and Sustainability Committee, which reports to the Board of Directors.</p>
<b>MDR-P 65(b-f)</b>	<p><b>Scope:</b> See E1-2</p>

<b>Code of Conduct of the Ebro Foods Group</b>	
<b>MDR-P 65(a)</b>  <b>E2-1; 15</b>	<p><b>Contents:</b></p> <p>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.</p> <p>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.</p> <p>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.</p>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b> Ebro Group</p>
<b>MDR-P 65(c)</b>	<p><b>Most senior level accountable for implementation:</b> The Board of Directors is the body responsible for its approval.</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>-United Nations Universal Declaration of Human Rights</li> <li>-Principles of the International Labour Organization (ILO)</li> </ul>
<b>MDR-P 65(e)</b>	N/A
<b>MDR-P 65(f)</b>	<p><b>Availability:</b> The Code is available on the Group's corporate website (<a href="#">Código-de-Conducta</a>).</p>

Supplier Code of Conduct of the Ebro Foods Group	
MDR-P 65(a) E2-1; 15	<p><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.</p> <p>It thus establishes the obligation for its suppliers to comply with the applicable laws and standards.</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> Suppliers</p>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation:</b> 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>- 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>
MDR-P 65(e)	N/A
MDR-P 65(f)	<p><b>Availability:</b> The Code is available on the Group's corporate website (<a href="#">Código-de-Proveedores.pdf</a>).</p>

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
- The policies do not explicitly address any pollutant, but merely establish the general principles of action in respect thereof.

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

\*(18)

In 2025 the following actions were taken in own operations to improve effluent and air quality.

ACTION	SCOPE	COMPANY	HORIZON	CAPEX (€ 000)	OPEX (€ 000)	CAPEX 2026 & later (€ 000)
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Improve effluent quality	Renovation and optimisation of water treatment systems at the Avio and Vicenza plants	OO	Bertagni	Long term	85	246	3,500
Improve effluent quality	Wastewater buffer tank with pH regulation	OO	Ebro Frost Denmark	Long term	201		148
Improve effluent quality	Optimisation of water treatment systems	OO	Lustucru Frais	Medium term	144		
Improve air quality	New particle and dust aspiration system	OO	Ebro Ingredients	Medium term	4		
<b>TOTAL</b>					<b>434</b>	<b>246</b>	<b>3,648</b>

<b>KEY: Scope</b>
Up: Upstream
OO: Own Operations

With regard to water treatment, the most important investments were made by Ebro Frost Denmark, followed by Lustucru Frais and Bertagni. The latter completed the installation of a new effluent treatment facility at Avio, and the one at its other plant, in Vicenza, is expected to be completed in the coming years, with an additional investment of approximately EUR 3.5 million. There are no other plans approved in this regard.

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.

Actions were also taken in 2025 in respect of water treatment at the Group's plants, with an expenditure of EUR 246 thousand. These are recurring expenses and they are included in the item Other operating expenses (Note 7) in the income statement of the accompanying consolidated annual accounts.

In addition to the above-mentioned actions, a number of continuity actions are being developed, for which there is no associated material CapEx/OpEx, as they are part of the usual operations at the Group facilities:

- Quality controls to ensure compliance with EU laws and regulations by the products put on the market, which are very protective of end users and consumers of food products, so our suppliers must meet stringent requirements for food quality and guarantee.
- Compliance with environmental law at all the Group's facilities.
- To comply with effluent limits, some of our facilities have their own treatment plants.

- Selection of suppliers with sustainability policies and that have accepted the Ebro Group's Supplier Code of Conduct.

Actions were also taken in 2025 in our value chain, in the Group's principal sourcing areas (see E1-3). These actions promote (among other goals) a rational, efficient use of chemicals (plant health, fertilisers) and biological pest control, thereby reducing the use of these chemicals and, in turn, reducing soil pollution. In other cases, the actions were related with organic certification for crops.

It should be noted that most of our effluent (78%) is discharged into inland waters. This is due to the large volume of irrigation water used by Agromeruan, which mostly returns to the land.

### 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.

The effectiveness of the policy is monitored through compliance with the applicable environmental laws and regulations and the permissions granted.

All the projects and actions developed in the value chain, such as those described in E1-3, have field supervision and monitoring, by Group employees or external companies contracted for this work. In addition, all the certifications (SRP, Organic, among others) have external assurance by third party auditors.

### E2-4. Pollution of air, water and soil

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

There is no single procedure for collecting data on the pollution of wastewater from our production activities from all the Group's facilities, so we have only been able to collect data from the following plants:

- Herba Ricemills: San Juan de Aznalfarache, La Rinconada and Silla (facilities with physical treatment plants), Algemés (facility with aerobic digestion plant)
- Pastificio Lucio Garofalo: Gragnano (facility with aerobic digestion plant)
- Bertagni: Avio and Vicenza
- Ebrofrost Denmark: Orbaek
- Lustucru Frais: Lorette

None of the Group's facilities from which data has been obtained exceeds the applicable threshold specified in Annex II to Regulation (EC) 166/2006 for any of the air pollutants reported.

All our industrial installations are subject to compliance with the applicable laws and regulations and must stick within the effluent limits established in the environmental permissions obtained.

As a short and medium-term target, we will work to extend the Group's reporting scope in this area. At present there is no global monitoring in the Group of the evolution of effluent parameters over time, although there is company/plant-level monitoring to ensure compliance with effluent limits at each of the facilities.

## ESRS E3 - Water and marine resources

List of IROs associated with E3

Impacts, Risks and Opportunities						
Code	Description	Impact		VCh	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	Up OO	Present	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	Up 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	Up OO Down	Short term	

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

KEY: VCh
Up: 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 1,593 ha, of which only 924 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 commitment defined in the Long-Term Sustainability Plan "[HEADING TOWARDS 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 administrations, although no specific consultations were submitted to the latter.

All the sites of the Group and our value chain were taken into account, although without an exhaustive assessment of particular issues and locations. However, aspects related with the use of water for irrigation and salinity in certain crop-growing areas have been considered material owing to insufficient water resources as they can have a material impact on the productivity of the Group's plants, such as those situated in the Guadalquivir valley.

The IROs identified as material in the DMA 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.

E3-1. Policies related to water and marine resources

\*(11,12,13)

<b>Sustainability, Environmental and Corporate Social Responsibility Policy</b>	
<b>MDR-P 65(a)</b>	<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>
<b>E3-1; 12</b>	
<b>E3-1; 13</b>	
<b>MDR-P 65(b-f)</b>	<b>See E1-2</b>

However, this Policy does not directly address the material IROs related with water resources, the most important issues related with water management, or the material undertaking to reduce water consumption in irrigation areas in its own operations and upstream and downstream in the value chain.

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

\*(17,19)

In 2025 the company Riviana Foods took the following action related to water resources in own operations, at its Carlisle and Brinkley plants. Riviana Foods operates in the United States, a zone with medium-high water risk. The measures are designed to reduce the water consumption at these plants.

MDR-A: Actions and resources related to water and marine resources							
ACTION		SCOPE	COMPANY	HORIZON	CAPEX (€ 000)	OPEX (€ 000)	CAPEX 2026 & later (€ 000)
Reduction of use of water	Recirculation of water from steaming	OO	Riviana Foods	Short term	77		
<b>TOTAL</b>					<b>77</b>	<b>0</b>	<b>0</b>

KEY: Scope
Up: Upstream
OO: Own Operations

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, although it is committed to efficient use of water 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.

The lack of a global water management strategy makes it difficult to monitor the effectiveness of policies and actions. However, initiatives designed to optimise water consumption in industrial processes and in the field are implemented individually (not centralised) by Group subsidiaries and operating units. In some crop-growing areas, growers are exploring more efficient irrigation techniques and water handling strategies to minimise water stress and mitigate soil salinity (E1-3). There is constant monitoring of water availability in each of our sourcing areas, because water stress has a material impact on crop yields and, therefore, on the Group's sourcing strategy, which is adjusted annually.

- 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		
Volume (m³)	2025	2024
(a) Total water consumption	3,064,588	3,244,810
(b) Consumption in areas at water risk (high water stress)*	2,413,337	2,383,006
(c) Total water recycled and reused	2,943	2,742
(d) Total water stored	3,958	4,345
Total changes in storage	0	0

\*This value includes all the countries with areas of high or very high water stress

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

The water consumption by offices not owned by Ebro Foods, i.e. all leased offices, is excluded because it is negligible (withdrawal of less than 0.5% of the total in a worst-case scenario) and owing to the difficulty of obtaining data from the lessors. However, the data of the two offices owned by the Group (the office of Lustucru Premium Group in Lyon and the office of Transimpex in Lambsheim) are included.

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)).

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 (79%) and a small proportion is from wells (21%).

26% of the figures on water consumption were obtained from invoices or direct measurement (flow meter), the remaining 74% being estimated. This is due to the volume of water used by Agromeruan for farming the agricultural land in Morocco.

Water intensity	2025	2024
Water consumption (m <sup>3</sup> )	3,064,588	3,244,810
Net revenues (€million)	3,014	3,140
Water intensity (m <sup>3</sup> /€million)	1,017	1,033

Water consumption in areas at risk* (m <sup>3</sup> )	2025		2024	
Low	72,540	2%	69,532	2%
Low-medium	159,475	5%	263,288	8%
Medium-high	419,237	14%	528,983	16%
High	2,401,321	78%	2,347,437	72%
Extremely high	12,016	—%	35,569	1%

Only the Taraori plant owned by Ebro India reports reused water. During 2025, the volume was 2,943 m<sup>3</sup>/year. In 2024, for the same plant, recycled water totalled 2,742 m<sup>3</sup>/year.

With regard to the water storage indicator, it was not possible to obtain information from all the Group companies. The (i) San Juan de Aznalfarache, Jerez de la Frontera, Isla Mayor, La Rinconada, Silla and Algesesí plants of the Spanish subsidiary Herba Ricemills and (ii) Freeport plant owned by the US subsidiary Riviana Foods, all have water storage.

## ESRS E4 - Biodiversity and ecosystems

List of IROs associated with E4

Impacts, Risks and Opportunities						
Code	Description	Impact	VCh	Time Horizon	Policies associated with IRO	
<b>Biodiversity</b>						
IP-17	Creation of agricultural habitats with high ecological value (wetlands, habitats of protected species, etc.)	I+	P	Up	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	Up	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	Up OO Down	Short term	

<p><b>KEY: Impact</b></p> <p>I+: Positive Impact</p> <p>I-: Negative Impact</p> <p>O: Opportunity</p> <p>R: Risk</p> <p>P: Potential</p> <p>A: Actual</p>	<p><b>KEY: VCh</b></p> <p>Up: Upstream</p> <p>OO: Own Operations</p> <p>Down: Downstream</p>
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### SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

\*(16b,c)

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.

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

\*(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.

The dependencies on biodiversity, ecosystems or ecosystem services in our own operations and those of our value chain were identified and assessed in the DMA. The assessment criteria considered in the analysis of all the IROs are based on knowledge of the sector and the dynamics of the agricultural and sourcing systems.

Systemic risks associated with biodiversity and ecosystems were also considered, such as:

- Higher temperatures and their impact on ecosystems, with increased pests and crop disease
- Loss of natural habitats with effects on key ecosystem services
- Structural degradation of soil and its impact on agricultural productivity.

In the qualitative assessment, we considered the direct impacts of loss of biodiversity and soil degradation in sourcing areas deriving from intensive farming practices and the loss of natural habitats, which affects key ecosystem services such as pollination and climate regulation.

Three IROs were identified as material in the DMA 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.

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 DMA no Group facilities were identified as having a material adverse impact on a biodiversity-sensitive area and, therefore, no actions related with the mitigation of impacts on biodiversity were identified as necessary.

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)

<b>Sustainability, Environmental and Corporate Social Responsibility Policy</b>	
<b>MDR-P 65(a)</b>	<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>
<b>MDR-P 65(b-f)</b>	See E1-2

- 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
  - Impacts on the state of species and impacts on the extension and state of ecosystems

- Material impacts related with biodiversity and ecosystems
- Dependencies, material physical and transitional risks and opportunities

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

<b>Supplier Code of Conduct of the Ebro Foods Group</b>	
<b>MDR-P 65(a)</b>  <b>E2-1; 15</b>	<b>Contents:</b>  The Supplier Code of Conduct of the Ebro Group sets out the basic principles and values that must underpin the relations of companies and professionals in the Ebro Foods Group with service providers.  It thus establishes the obligation of its providers and service providers to comply with applicable laws, regulations and standards.  The Audit, Control and Sustainability Committee is responsible for monitoring and oversight, reporting to the Board of Directors.
<b>MDR-P 65(b-f)</b>	<b>See E2-1</b>

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

\*(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.

All the sustainable agriculture projects described in E1-3, particularly the AWD project developed by Ebro India, impact biodiversity and ecosystems, as the programmes encourage the use of sustainable agriculture practices that have a positive impact on soil quality or nutrition, water quality, etc.

In 2025, Bertagni participated in a marine biodiversity protection programme:

MDR-A: Action and resources related to biodiversity and ecosystems						
ACTION	SCOPE	COMPANY	HORIZON	CAPEX (€ 000)	OPEX (€ 000)	CAPEX 2026 & later (€ 000)
Marine biodiversity protection programme		Bertagni	Short term	-	3	
			TOTAL	-	3	

No future biodiversity actions are planned.

#### E4-4. Targets related to biodiversity

\*(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 sustainable agriculture initiatives that may have a positive impact on biodiversity. Growers are monitored constantly through field visits and external audits (see E1-3).

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	VCh	Time Horizon	Policies associated with the IRO	
<b>Circular Economy</b>						
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	Improvement of access to food and reduction of pressure on food systems through reduction of food waste in the Ebro Foods value chain (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	Present	
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	Up OO Down	Short term	

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

KEY: VCh
Up: 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, "HEADING TOWARDS 2030", (iii) different external initiatives in which the Group participates, 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). The assets and sites of the Group and our value chain were assessed, although without an exhaustive assessment of particular issues and locations. We also used the historic information available on the raw materials and auxiliary material (packaging) 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 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 topic.

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

\*(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 directly 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. But the Group undertakes in the Policy to develop programmes and measures to boost circular economy and Zero Waste.

<b>Sustainability, Environmental and Corporate Social Responsibility Policy</b>	
<b>MDR-P 65(a)</b>	<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 resource use and circular economy, establish the undertaking to optimise their use and to prevent and minimise 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>
<b>E5-1 14</b>	
<b>E5-1; 15</b>	
<b>E5-1; 16</b>	
<b>MDR-P 65(b-f)</b>	See E1-2

## E5-2. Actions and resources related to resource use and circular economy

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

In addition to the actions described below in MDR-A, the Group develops a number of continuity actions for which there is no associated material CapEx/OpEx, as they are part of the usual operations at the Group facilities:

### Actions related with optimisation of the use of biological resources:

- Recovery of certain by-products such as rice husk for use as fodder or bedding for animals.
- Use of charcoal, husk or wood chips as a renewable fuel (Ebro India, Herba Ricemills, Mundiriso and Ebro Frost Denmark).
- The Ebro Group 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, of which the Group has been a member since 2012. The programme aims to inform people about the efforts being made by companies to prevent food waste, raise awareness throughout the value chain to prevent waste generation and encourage the utilisation of food throughout the value chain.
- Supplementing this, and focusing specifically on the prevention of waste at origin, in 2024 the Group, through the Ebro Foundation, started to sponsor the Ashoka fellow Mireia Barba and her project “Espigoladors”. This initiative acts on the primary sector by recovery of agricultural surpluses that are not offered for sale due to market reasons or aesthetic criteria, through gleaning. The project promotes the recovery of that food through gleaning, thereby helping to reduce waste in the field and promote circular economy, along with actions to make society aware of more sustainable food systems.
- The Group also manages food surplus generated in its operations, embracing any products that are fit for consumption but which, for different reasons -such as packaging defects, logistics incidents or being close to their use-by date-, are not suitable for sale to consumers. This surplus is mainly donated to food banks and social institutions, thus ensuring that the products are used and avoiding waste.

Moreover, as indicated in other sections of this Statement, under Act 1/2025 of 1 April 2025 on prevention of food loss and waste, the three Group companies established in Spain (Arotz, Santa Rita and Herba Ricemills) are developing a Food Waste Prevention Plan, to be implemented in 2026.

### Actions related with waste management and circular economy:

- Recycling containers at all the Group’s workplaces and waste separation, giving precedence to waste recovery.
- Joining ECOEMBES on a national level.

With regard to 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.

- Constant search for new packaging materials that will enable us to meet the plastic reduction and recycling targets, through actions intended to reduce the thickness of packaging materials, seek plant-based alternatives, substitute paper for plastic packaging and replace triplex or duplex materials (that are not recyclable) with single-material packaging (that is recyclable).

The main actions in 2025 related with the recycling of materials are associated with changes in the packaging material of our products and our commitment to 100% recyclability stemming from the design of our packaging by 2030.

MDR-A: Actions and resources related to resource use and circular economy							
ACTION		SCOPE	COMPANY	HORIZON	CAPEX (€ 000)	OPEX (€ 000)	CAPEX 2026 & later (€ 000)
Waste reduction	Flour silo, recycling programme and improvement of processing - of flour that was previously discarded	OO	Ebro Frost Denmark	Short term	2		
Waste reduction	Improvement of processes, reuse of product and elimination of waste	OO	Tilda Ltd	Long term	397		445
Packaging reduction	Mykerinos project: new packaging solution to remove over-packaging for promotional products	OO Down	Lustucru Frais	Long term	220		455

Improved recyclability and plastic packaging	Changes in the composition of a non-recyclable triplex material (PET/PET/PP) to convert it to single-material (PP) with SIOX barrier, which is 100% recyclable by design (ready to be recycled)	OO Down	Herba Ricemills	Long term		2.7	4.5
				<b>TOTAL</b>	<b>619</b>	<b>3</b>	<b>905</b>

**KEY: VCh**

Up: 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 2026, with an additional investment contemplated of approximately €1 million.

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

\*(23,24,25)

The Long-Term Sustainability Plan “HEADING TOWARDS 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 avoidance and recovery practices.

#### Targets related to increase of circular product design and minimisation of primary raw materials

- Eliminate 20% of plastics
- 100% of our packaging recyclable by design

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

The targets defined in the Long-Term Sustainability Plan “HEADING TOWARDS 2030” are related to the commitment established in the Group’s policy to optimise the utilisation of resources 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 targets are defined at Group-level, without direct participation of the interested parties, and are defined using internal criteria of the Group.

2025	2021 (base year)	Variation (t)	Variation (%)
24,184	38,247	-14,063	(37)%

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.

E5-4. Resource inflows

\*(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	2025		2024	
	Weight (tonnes)	%	Weight (tonnes)	%
Technical materials (packaging)	80,107	3%	77,253	3%
Biological materials (raw materials)	2,228,162	97%	2,339,714	97%
Total	2,308,268		2,416,966	

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

Rice is our main raw material (86%), followed by wheat (10%) and other ingredients (4%).

The packaging materials for finished products are mainly paper and cardboard (59%) and plastic (30%).

Type of Material	2025		2024	
Plastic	24,200	31%	25,259	33%
Paper/Cardboard	47,003	59%	43,137	56%
Glass	0	0%	14	0%
Metal	1	0%	1	0%
Others	8,903	10%	8,842	10%
Total (tonnes)	79,049		75,292	

Note: This indicator has not been validated by an external body other than the verification provider for this Statement.  
Note: The data on the company Transimpex is not available, so it is excluded from the scope of reporting.

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 company reports the quantities of packaging used, whether it can be recycled and the amount of recycled material it contains in the reporting year. The information on the quantity of packaging used is mostly (97%) obtained from our internal management systems (SAP or similar, invoices or direct measurement) and the rest (34%) is estimated. The information on the content of recycled material is obtained from the data sheets of the packaging suppliers or, if this is not available, it is estimated based on similar materials.

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, almost all the primary packaging used in our Group is virgin fibre, with a minimal proportion of recycled fibres (2%).

The different secondary and tertiary packaging formats used by the different Group companies both contain 50% of recycled fibres.

The average recycled fibre content of all packaging used by the different Group companies is 30%.

Recycled fibre content	2025		2024	
Primary packaging	547	2%	710	2%
Secondary/tertiary packaging	23,101	50%	23,365	53%
Total recycled fibre	23,648	30%	24,075	32%

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

## 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

98% of the waste generated in 2025 was non-hazardous waste.

Waste	2025		2024	
	tonnes	%	tonnes	%
Non-hazardous	36,549	98%	35,621	99%
Hazardous	600	2%	461	1%
Total Waste (tonnes)	37,149	100%	36,082	100%

75% of the waste generated is recovered.

Waste Destination	2025		2024	
	tonnes	%	tonnes	%
Total Waste Disposed	9,129	25%	14,809	41%
Total Waste Recovered	28,019	75%	21,273	59%
Total waste (tonnes)	37,149		36,082	

The total waste not recycled is 77%.

	2025		2024	
	tonnes	%	tonnes	%
Total Waste Not Recycled (tonnes)	28,450	77%	23,552	65%

The breakdown by type of waste and type of treatment is set out below:

Non-Hazardous Waste for Disposal	2025		2024	
	tonnes	%	tonnes	%
Landfill	5,830	16%	8,915	25%
Incineration	1,429	4%	1,783	5%
Other disposal operations	1,332	4%	3,677	10%
Total non-hazardous waste disposed (tonnes)	8,590	24%	14,375	40%

Hazardous Waste for Disposal	2025		2024	
Landfill	355	59%	355	77%
Incineration	12	2%	19	4%
Other disposal operations	172	29%	60	13%
Total hazardous waste disposed (tonnes)	539	90%	433	94%

Non-Hazardous Waste deviated from Disposal (Recovered)	2025		2024	
Recycled	8.674	24 %	12.505	35 %
Prepared for reuse	1.735	5 %	107	0 %
Other recovery operations	17.550	48 %	8.633	24 %
Total non-hazardous waste recovered (tonnes)	27.959	76 %	21.246	60 %

Hazardous Waste deviated from Disposal (Recovered)	2025		2024	
Recycled	24	4 %	24	5 %
Prepared for reuse	15,52	3 %	0	— %
Other recovery operations	20,88	3 %	3	1 %
Total hazardous waste recovered (tonnes)	61	10 %	27	6 %

Note: The waste generated in all the offices (18) is excluded from the calculation of waste generated as it represents a negligent proportion of total waste generated.

Note: The data on the company Transimpex is not available, so it is excluded from the scope of reporting.

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

The Group does not generate any radioactive waste.

Practically all the waste generated by the Group's 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 (92%) 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		VCh	Time Horizon	Policies associated with the IRO
<b>Working Conditions</b>						
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
<b>Training and Skills Development</b>						
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
<b>Diversity and Inclusion</b>						
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.
<b>Promotion of Human Rights</b>						
R-22	Theft, leaks or unauthorised access to private or confidential information of the company or third parties,	R	P	OO Down	Short term	Code of Conduct of the Ebro Group

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.				
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<b>KEY: Impact</b>
I+: Positive Impact
I-: Negative Impact
O: Opportunity
R: Risk
P: Potential
A: Actual

<b>KEY: VCh</b>
Up: 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 6,854 professionals, of whom 5,937 are direct employees of the Group and 917 are hired 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 (IROs) – Own workforce

In the DMA made by the Ebro Group, a potential negative impact was identified related with equal pay, which could affect motivation and talent retention, generating a financial risk owing to increased hiring costs and loss of competitiveness in respect of other companies in the sector.

To mitigate this risk, the Group is firmly committed to reducing and eventually eliminating the gender-based pay gap, implementing equality plans and policies that guarantee fair treatment at all levels of our organisation.

The Group also fosters well-being at work through practices that guarantee fair working conditions: adequate working times, fair pay policies and effective control of occupational hazards. These measures strengthen employees' abilities and contribute towards social and economic stability in the communities where the Group operates.

Thanks to the decentralised personnel management policy of the Group with Human Resources managers in the most important companies in the Group, we have a high level of knowledge and contact with the workforce. This model enables a more hands-on management, adapted to the operating reality in each subsidiary.

In this framework, each company applies specific policies and guidelines aligned with the corporate principles and adapted to local laws, in areas such as health and safety at work, training and professional development, diversity and equal opportunities, as well as equal pay for men and women.

Access to collective bargaining is guaranteed by Works Councils in the countries in which that figure is legally recognised. This helps to improve working conditions, increase the percentage of employees covered by collective agreements and strengthen stable, constructive labour relations.

The commitment to equal treatment and opportunities is reinforced through mechanisms such as the EU Whistleblowing Directive and the Internal Reporting System (IRS), which includes a Corporate Whistleblowing Channel accessible by the entire Group. This system contributes towards boosting confidence and transparency and enabling the early detection of possible defaults, strengthening the culture of respect and safety in the workplace.

Finally, the corporate Code of Conduct provides a common benchmark framework to guarantee ethical and responsible behaviour in all the Group's subsidiaries, establishing the minimum principles applicable to employment and labour rights.

	2025	2024
(Gender-based) pay gap	42.27%	30.07%
% Employees covered by collective or other agreements	73.42%	69%
Hours training per employee	30.68	24
Injury rate*	16.89	17.64
Turnover rate	10.44%	12%
Cases handled through whistleblowing channel (IRS)	18	6

(\* ) To obtain the injury rate we used the formula  $(no. \text{ injuries} / \text{hours worked}) * 1000000$ . Lost days through injury of own workforce (employees) have been taken into account, including injuries on the way to and from work.

## Risks and Opportunities deriving from the Impacts and Dependencies

The Ebro Group reaffirms its commitment to the continuous improvement of working conditions through initiatives focusing on health, safety, equality and diversity. The implementation of a health and safety management system, certified under the standard ISO 45001, boosts the protection of our employees' well-being, helping to reduce the risks of work-related injuries and ill health and strengthens the Group's reputation, generating confidence among workers, customers, investors and communities.

With regard to equality and diversity, the Group promotes policies designed to guarantee equal access to opportunities and equal pay, regardless of gender, race, sexual orientation or disability. These policies help to promote an inclusive work environment and, at the same time, they represent a strategic opportunity to strengthen the Group's position as a socially responsible undertaking and to enhance our ability to attract and retain diverse talent.

One of the risks identified was the challenge of attracting specialised talent in key areas such as maintenance and electromechanics, which could affect operating efficiency. In addition, information security and data protection are growing risks in a context of greater digitalisation and automation of processes. To mitigate these risks, the Group implements specific protocols and technologies designed to guarantee the integrity of information and business continuity in the face of potential cyber-threats.

Through these measures, together with a proactive risk management, we are able to transform the challenges identified into opportunities, consolidating the sustainability of the business and boosting the confidence of our stakeholders.

### Climate transition plans

The Ebro Group is progressing in the definition of its climate transition, making sure that the decisions adopted are consistent with the well-being, safety and stability of our workforce.

During 2025 the Group addressed the first stage, focusing on analysis and planning of Scopes 1 and 2 in Spain. In 2026, this work will be extended to the other Group companies. Once this stage has been completed, the Group will analyse **Scope 3** in 2027, as part of its decarbonisation roadmap.

Throughout this process, the Group bears in mind that the transition to a low carbon model must be done in an orderly fashion and responsibly, without compromising safety, working conditions or employment and favouring, where appropriate, the development of new professional skills and abilities.

### Respect for Human Rights

The Ebro Group is firmly committed to the respect of Human Rights in all its operations and throughout its value chain, in accordance with the reference international standards and principles.

Although some of the Group's activities are performed in countries where there are widespread risks associated with forced labour or child labour, the Group applies a preventive approach, based on:

- Regular assessments of risks in own and suppliers' operations
- Audits and control mechanisms designed to prevent and mitigate possible irregularities
- Codes of Conduct for employees and suppliers, establishing ethical and labour principles consistent with international standards, especially those of the UN and the ILO.

So far, no significant risks have been identified of the violation of Human Rights in the Group's own operations, or specific groups within its workforce that are in a situation of special vulnerability.

In the DMA, we identified a critical operating risk relating to the difficulty of attracting specialised talent in areas such as maintenance and electromechanics, especially in the United States and Europe.

To mitigate this risk, the Group has taken measures such as:

- Pay rises and definition of new professional categories
- Recruitment in other regions, especially Spain and Latin America
- Collaboration with training centres and polytechnic universities
- More flexible access conditions and specific support through the use of subcontractors

At present, no specific opportunities have been identified associated with particular groups of people in respect of Human Rights, although the Group maintains a proactive approach to guarantee equal treatment, diversity and non-discrimination in all our processes.

## S1-1. Policies related to own workforce

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

<b>Code of Conduct of the Ebro Foods Group</b>	
<b>MDR-P 65(a)</b>	<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>
<b>S1-1_Par.20</b> <b>S1-1_Par.22</b>	<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> <ul style="list-style-type: none"> <li>▪ 9.1. Relationships among all Professionals shall be based at all times on respect for other people's dignity and <b>non-discrimination</b>.</li> <li>▪ 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.</li> <li>▪ 9.3. The Group rejects any form of direct or indirect <b>child labour</b>.</li> <li>▪ 9.4. <b>Forced, compulsory labour</b> is not permitted in any Group company.</li> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul>
<b>MDR-P 65(b)</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>
<b>MDR-P 65(c)</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>

<b>MDR-P 65(d)</b> <b>S1-1_Par.21;</b> <b>AR12</b>	<b>Disclosure of third-party standards or initiatives to which Group commits</b> -Universal Declaration of Human Rights -United Nations Guiding Principles on Business and Human Rights -ILO Conventions and Recommendations
<b>MDR-P 65(e)</b>	<b>Consideration of stakeholders' interests</b> The Code of Conduct of the Ebro Foods Group was drawn up taking account of the interests and expectations of our own workforce in respect of the ethical principles and behaviour that must prevail in all the Group's professional activities. This perspective has enabled us to define a common reference framework for employment, labour relations and respect for Human Rights consistent with the Group's operating and organisational context.
<b>MDR-P 65(f)</b>	<b>Availability:</b> The COC is available on the Group's corporate website ( <a href="#">Código-de-Conducta</a> ). 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.

<b>Sustainability, Environment and Corporate Social Responsibility Policy of the Group</b>	
<b>MDR-P 65(a)</b>	<b>Contents:</b> 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. <b>Principles of action</b> (point 5) The most relevant points are: 5.3. With regard to the management of human capital and development of talent 5.4. With regard to Human Rights  With regard to our own workforce, the stakeholder being " <b>Our team</b> ", (point 6.1), the Policy establishes the following: - The personal and professional development of directors, executives and employees of the Group is promoted, encouraging them to improve their skills and abilities. - 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. - 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. - Professionals are offered fair pay in keeping with the labour market. - 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.
<b>S1-1_Par.20</b> <b>S1-1_Par.22</b>	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. In particular, the <b>Code of Conduct of the Group</b> sets out the Group's commitments to Human Rights in point 9, (9.1.,9.2., 9.3., 9.4., 9.5., 9.6. y 9.7.) set out in the previous table.
<b>MDR-P 65(b)</b>	<b>Scope:</b> 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.
<b>MDR-P 65(c)</b>	<b>Most senior level accountable for implementation:</b> The Board of Directors is responsible for its approval and the Audit, Control and Sustainability Committee for its oversight and implementation
<b>MDR-P 65(d)</b> <b>S1-1;</b> <b>Par.21_AR 12</b>	<b>Disclosure of third-party standards or initiatives to which Group commits</b> -Universal Declaration of Human Rights -United Nations Guiding Principles on Business and Human Rights -ILO Conventions and Recommendations -Conformity with section 529 ter of the Corporate Enterprises Act ("LSC")

<b>MDR-P 65(e)</b>	<p><b>Consideration of stakeholders' interests</b></p> <p>The interests of the Group's principal stakeholders, were taken into account when defining this Policy, including its own workforce from a global, integrating perspective. This approach enabled us to incorporate in the policy the most important social and labour aspects, making sure they were aligned with the Group strategy and its sustainability-related commitments.</p>
<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>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>

<b>Policy on the Internal Reporting System and Whistleblower Protection of the Ebro Foods Group</b>	
<b>MDR-P 65(a)</b>	<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>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b></p> <p>The Policy is applicable to all internal reporting channels and the procedures for handling information integrated in the Internal Reporting System.</p> <p>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.</p> <p>It is extended to the Ebro Foundation.</p>
<b>MDR-P 65(c)</b>	<p><b>Most senior level accountable for implementation:</b></p> <p>Audit, Control and Sustainability Committee and/or any relevant Committee that delegates to the Board of Directors of the parent.</p>
<b>MDR-P 65(d)</b>	<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>

<b>MDR-P 65(e)</b>	<p><b>Consideration of stakeholders' interests</b></p> <p>The expectations of the Group's labour force were considered when drawing up this Policy, in relation to the existence of a framework that guarantees the trust, confidentiality and protection of whistleblowers. This consideration was behind the design of the policy with a focus aligned with the needs of the workplace environment and the applicable standards and regulations.</p>
<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-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>

<b>Policy on the Selection of Directors and Diversity in the Ebro Foods Board of Directors</b>	
<b>MDR-P 65(a)</b> <b>S1-1; 21(a)</b>	<p><b>Contents:</b></p> <p>This Policy, applicable exclusively to the Directors of the Ebro Group, establishes the following "<u>Applicable Principles</u>" (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): "<u>Conditions to be met by candidates</u>":</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>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b></p> <p>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.</p> <p>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>
<b>MDR-P 65(c)</b>	<p><b>Most senior level accountable for implementation:</b></p> <p>Nomination and Remuneration Committee of the Ebro Group</p>
<b>MDR-P 65(d)</b>	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b></p> <p>-Corporate Enterprises Act</p>
<b>MDR-P 65(e)</b>	<p><b>Consideration of stakeholders' interests</b></p> <p>The interests and expectations of the principal stakeholders were taken into account when drafting and reviewing this Policy, especially our shareholders, the market and society, in relation to the need to have a diverse, balanced Board of Directors in line with the best corporate governance practices. This consideration enabled us to define selection criteria that would guarantee suitability, diversity of profiles and the absence of any discriminatory bias, while boosting trust in the Company's governance system and in the decision-making by the highest administrative body.</p>
<b>MDR-P 65(f)</b>	<p><b>Availability:</b></p> <p>This Policy is private; it can be found on the different intranets of the Group.</p>

<b>Remuneration Policy for Directors of Ebro Foods, S.A.</b>	
<b>MDR-P 65 a)</b>	<p><b>Contents:</b>  (Point 3): "<u>Principles and targets governing Directors' remuneration. Contribution of the policy to the strategy, interests and long-term sustainability</u>" establishes the following:  " 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):  (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.  (ii) The remuneration shall be set according to the importance of the company, its economic situation from time to time and comparable market standards.  (iii) Directors' remuneration should be reasonable without compromising their independence of judgement, especially that of non-Executive Directors.  (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.  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>
<b>S1-1; 21(a)</b>	<p><b>(Point 5.) "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>
<b>MDR-P 65 b)</b>	<p><b>Scope:</b>  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>
<b>MDR-P 65 c)</b>	<p><b>Most senior level accountable for implementation:</b>  -Nomination and Remuneration Committee of the Ebro Group</p>
<b>MDR-P 65 d)</b>	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b>  -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.  -Article 22 of the Articles of Association</p>
<b>MDR-P 65 e)</b>	<p><b>Consideration of stakeholders' interests</b>  The expectations of the principal stakeholders were taken into account when drafting this Policy, as well as the need to ensure that the policy was consistent with the Group's general sustainability and good governance principles. Criteria of fairness, long-term sustainability and alignment with the organisation's global strategy were considered in this regard.</p>
<b>MDR-P 65 f)</b>	<p><b>Availability:</b>  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

### Human Rights

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 career advancement 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 and social audits at our workplaces (SMETA 4P/BSCI and SMETA), that assess compliance in areas such as:

- Working conditions and respect for human rights: non-discrimination, equal treatment and non-discrimination in selection and promotion processes and in pay), freedom of association
- Workplace health and safety: compliance with laws and regulations on the prevention of occupational hazards, training in safety, accident logs
- Ethical practices and transparency in labour relations
- Environmental management related with the work environment

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.

#### Health and safety at work

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 work environment.

Social audits in own workplaces

During 2025, 18 social audits were made at 10 of the Group’s workplaces (7 audits in 5 workplaces in 2024).

Summary of social audits made in 2025

Indicator	2025
No. audits made	18
No. companies audited	10
Total no. non-compliance	121
% Non-compliance corrected	52%
Total no. critical non-compliance	14
% Reduction of critical risks	64%

*Note: No comparative information for 2024 is presented because the breakdown available for that year is not homogeneous and comparable, as a result of the changes made in the Sedex platform.*

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

\*(27,28)

**Communication and participation channels**

The Group has implemented several communication channels and procedures 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
- Corporate whistleblowing channel

The Group also ensures that any contributions received through these channels are included in labour policies and action plans, informing the workforce of the results to guarantee transparency and trust.

## **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 process**

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

- 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 participate in the identification of risks and definition of preventive and corrective plans.

The contributions received through these channels are incorporated in the definition of Human Resources policies, training plans and prevention measures, making sure the decisions reflect the needs detected.

## **Commitment to own workforce and workers' representatives**

The Ebro Group's 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, including the management of impacts and implementation of agreed corrective measures.

## **Stage, type and frequency of engagement**

Employee engagement takes place at different stages of employment management:

- Design of policies (prior consultation with workers' representatives)
- Implementation (regular follow-up meetings)
- Assessment (surveys and analysis of results)

The frequency varies according to the company:

- Meetings with workers' representatives: quarterly in most companies
- Health and Safety Committees: monthly or as stipulated in local law

## **Assessment of 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. For this, the Group and its subsidiaries systematically analyse the information collected in the different dialogue spaces, 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.

## **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.

## **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 Corporate 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. In addition, the Group subsidiaries that are obliged by local law to have grievance 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".

Specific processes for redressing negative impacts (how the damage is remedied, not only investigated):

- Channels for general concerns (consultations, suggestions, not only irregularities)
- Feedback to the worker regarding the state of their report
- Effectiveness indicators (number of cases, time to solve, satisfaction)
- How the lessons learnt are integrated in continuous improvement

#### S1-4. Taking action to manage IROs

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

Actions related with personnel management in the Ebro Foods Group are developed with a view to managing the IROs identified that affect the Group's professionals, and they are set out in the general guidelines defined in the Long-Term Sustainability Plan "Heading towards 2030".

The Group has defined principles, approaches and general lines of action related with health and safety at work, managing and retaining talent, work-life balance and the development of professional skills and abilities, among other aspects, in accordance with the IROs identified for own workforce.

These actions have a global scope embracing the entire Group, although they are developed and implemented by the individual companies in accordance with the Ebro Group's management model. So each company designs, applies and manages its own Human Resources measures, adapting them to their respective operating situations, local laws and the specific needs of their teams, thereby enabling proportional, adjusted management of the IROs associated with the workforce.

#### **Measures to avoid or mitigate negative impacts (actual or potential)**

The different Group companies have a common framework for action in respect of principles and approaches, consisting of the identification, analysis and management of possible actual or potential negative impacts on their professionals, through measures defined and applied within each subsidiary.

In general, this approach comprises the following stages:

- Preventive identification of situations that might generate negative impacts, through the internal management, control and supervision mechanisms existing in each company
- Analysis and assessment of those situations by the areas responsible, considering their nature, extent and possible effects on the workers
- Definition and implementation of preventive or mitigating measures, where appropriate, within the scope of responsibility of each company
- Monitoring of the measures adopted to assess their adequacy and reinforce or adjust them if necessary.

When impacts are identified that require specific corrective actions or the activation of formal channels, they are handled through the processes and mechanisms described in section S1-3, avoiding duplicities in the reporting.

### Monitoring of the effectiveness of measures taken

The effectiveness of measures taken is monitored proportionally and adapted to the nature of the actions and the context of each company. For this purpose, subsidiaries use internal management and review tools that enable them to identify areas for improvement and reinforcement, if necessary, in the approaches applied in personnel management.

In this context and without prejudice to the autonomous management of each subsidiary, the main types of measures applied by the Group companies to avoid or mitigate actual or potential negative impacts on their respective employees include, among others:

:

- Diversity and inclusion, through practices and policies designed to promote a fair, respectful working environment
- Training and professional development, designed to improve employability and internal skills
- Health and safety at work, through occupational hazard prevention systems, operating protocols and specific job-related training
- Fair working conditions, through compensation and employment policies and practices aligned with the Group's principles of equity.

These measures are preventive or mitigating and are developed on a company-level, according to the operating situation of each company and the risks identified.

Both the Group and its companies have specific mechanisms to address and remediate any negative impacts that may arise, including the following, among others:

- Communication and reporting channels through which employees can report any situation of risk or vulnerability
- Support measures, such as psychological or social assistance programmes in any situations that so require
- Review and improvement of processes, analysing the causes of impacts and taking remedial measures on a local level.

The Group companies apply the following actions, among others, to any material risks deriving from dependencies:

- Training in Occupational Hazard Prevention
- Safety protocols adapted to the operations at each workplace
- Continuous supervision of impacts and plans for improvement
- Assessment of psychosocial risks, focusing on aspects such as workload, stress and emotional well-being.

### **Initiatives to generate positive impacts**

The companies in the Ebro Group develop initiatives that contribute proactively to generating positive social impacts, improving the well-being, motivation and career advancement of their employees.

The initiatives promoted generally by the Group companies include especially:

- Career plans and career advancement
- Measures to improve work-life balance
- Health and well-being programmes
- Acknowledgement and motivation initiatives
- Welfare benefits adapted to local laws and practice.

The subsidiaries also use the following tools, among others, to identify and pursue material opportunities:

- Leadership and mentoring programmes
- Internal mobility and promotion
- Investment in digitalisation and new skills

At the same time, the Group establishes a common framework to ensure that our work-related policies and practices are responsible and do not generate any harm to their 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 resources to the management of material impacts identified in relation to our workforce, in accordance with our decentralised management model and with a view to preventing, mitigating and adequately managing any actual or potential negative impacts associated with our workforce.

In particular, the resources are allocated to the following areas:

- Human Resources Teams: each company in the Group has HR teams responsible for identifying work-related and social risks, implementing preventive or mitigating measures and monitoring their effectiveness. These teams play a key role in adapting the Group's principles and guidelines to the local operating situations, ensuring a tailored, hands-on management of the impacts identified.
- Budgets for training, well-being and working conditions: the Group companies handle specific budgets for training, work-related health, well-being and welfare benefits, resulting in specific actions such as training programmes, risk prevention measures, initiatives to enhance the work-life balance or provide support in situations of vulnerability. These resources enable companies to address constantly the prevention of the principal work-related and social risks identified.

- Safety and prevention infrastructures: resources spent on equipment, installations and prevention systems reduce exposure to work-related risks, improve working conditions and foster a preventive culture in our workplaces, contributing towards the mitigation of negative impacts related to health and safety.
- Measuring and reporting systems: our subsidiaries use internal tools to collect and analyse information related with aspects such as work-related injuries, employee turnover, training or incidents reported. This information is used to assess the effectiveness of the measures taken, identify trends and define actions for improvement when necessary.

The use of these resources enables Group companies to monitor the evolution of the principal IROs, adjust the measures applied based on the results observed and contribute towards continuous improvement in personnel management and in the prevention and mitigation of negative impacts on the workforce.

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

\*(81)

The Ebro Group has defined a framework for action for the management of real and potential impacts on its workforce, aligned with the Sustainability Plan “HEADING TOWARDS 2030” and based on a decentralised management model. In this model, the Group establishes common principles and monitoring systems, while the specific definition and implementation of measures is made by each company individually, taking account of its operating situation, local laws and characteristics of its workforce.

#### Strategic principles (common to all companies)

- 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

These principles are aligned with the principal impacts and risks identified in the DMA, particularly in relation to working conditions, health and safety at work, equal opportunities, professional development and respect for Human Rights.

## Targets defined

Scope	Target 2030	Indicator	Associated IROs	Status 2025
<b>Training</b>	Promote continuous training of own workforce, reaching an annual cover of between 85 % and 90%	% of employees with annual training	R-61; IP-22	95% of own workforce has received annual training
<b>Equal Pay</b>	Reduce the gender-based pay gap	Pay gap	IN-24; O-23	10% reduction from 2019
<b>Diversity</b>	Promote diversity and equal opportunities in management positions, raising the proportion of women to 40%	% women in management positions	O-23; IP-22	35.12% women in management positions
<b>Professional Development</b>	Promote professional development and internal mobility of talent through internal promotion	No. promotions / year	R-61; IP-22	Cumulative increase of 142.7% in internal promotions since 2019
<b>Health and Safety</b>	Ensure that 100% of the workforce is covered by a system of health and safety at work	% workforce represented	O-20; IP-22	100% of workforce represented in Health & Safety Committees
<b>Health and Safety</b>	Zero fatal accidents	No. fatal accidents	O-20	"0" fatal accidents
<b>Human Rights</b>	Guarantee training in Human Rights for 100% of our employees	% workforce who receive training in Human Rights	IP-29; IP-22	100% employees received training in Human Rights

## Time horizon, governance and participation

These operating targets (2019–2030) remain in place as lines of management that contribute to preventing and mitigating work-related impacts and are regularly reviewed in the framework of “HEADING TOWARDS 2030” to assess whether they need to be updated in the event of material changes in the IROs or the availability of comparable data.

The HR Management and Health and Safety officers in each company are responsible for implementation and initial controls; data consolidation and reporting are done by the Group’s Communication, Social Responsibility and Sustainability department; and supervision corresponds to the Audit, Control and Sustainability Committee, incorporating the results in the Group’s Annual Sustainability Statement.

The definition and review of priorities are based on internal surveys, Works Councils and Health and Safety Committees, as well as other social dialogue spaces. Information on progress and areas for improvement is given through internal channels (informative meetings, intranet, internal newsletters, etc.).

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

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

Our people and responsible management of our human capital are a key component of the Ebro Group's sustainability model. The Group promotes the well-being, professional development and continuous training of our workforce as essential elements to guarantee a safe, inclusive working environment aligned with the ethical and social principles governing our activities.

In this context, the Ebro Group's most valuable asset is its 5,937 employees, whose knowledge, experience and commitment are fundamental for implementation of our corporate strategy, business continuity and long-term value generation.

### Characteristics of the company's employees

Information on number of employees by gender		
Gender	2025	2024
Male	4,205	4,000
Female	1,732	1,667
Others	0	0
Not informed	0	0
<b>Total employees</b>	<b>5,937</b>	<b>5,667</b>

\*The gap between the number of men and women is largely due to the predominantly factory-based nature of the Group, 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	2025	2024
Spain	935	918
United States	1,146	1,028
France	618	612
Italy	896	824

## Employees by gender and type of contract

The Ebro Group offers its workers stable, quality employment and a solid professional career, where 93.20% of the jobs are permanent.

### Type of contract

	2025				
	Female	Male	Other	No informed	Total
Permanent	1,619	3,914	0	0	<b>5,533</b>
Temporary	113	285	0	0	<b>398</b>
Non-guaranteed hours	0	6	0	0	<b>6</b>

	2024				
	Female	Male	Other	No informed	Total
Permanent	1,541	3,705	0	0	5,246
Temporary	113	259	0	0	372
Non-guaranteed hours	12	37	0	0	49

### Working hours

	2025				
	Female	Male	Other	No informed	Total
Full time	1,612	4,155	0	0	<b>5,767</b>
Part time	120	50	0	0	<b>170</b>

	2024				
	Female	Male	Other	No informed	Total
Full time	1,557	3,931	0	0	<b>5,488</b>
Part time	109	70	0	0	<b>179</b>

The average headcount of the Group in 2025, including employees and non-employees, is 6,854 professional, rather than the 6,752 indicated in Note 7.4 to the Annual Financial Statement 2025. This difference is due to the fact that the Annual Financial Statement does not include independent contractors (self-employed workers) (26) or the workers of the subcontractors of the subsidiary Herba Ricemills (108), and that this Statement does not include the workers employed by Indo European Foods.

## Employee turnover

During 2025, 620 employees left the Group, equivalent to a turnover of 10%.

For calculation purposes, the rotation has been determined taking the total number of own employees that left the Group during the year -including those who left voluntarily and those

dismissed, retired or deceased- divided by the average annual number of own employees in the same period.

For comparison, in 2024, 693 employees left, giving a turnover rate of 12%, calculated in the same way.

The interannual evolution of this indicator reflects the usual dynamics of the Group's workforce, influenced by factors such as the industrial structure of certain activities, seasonable employment in some geographical areas and the ordinary processes of renewal within the organisation.

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

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

73.42% of the employees in the Ebro Group (69% in 2024) are covered by the collective bargaining agreements of their respective business areas or some other kind of employment agreements applicable in their respective geographical areas.

The following tables show the collective bargaining coverage and social dialogue through a classification by ranges, distinguishing between countries of the European Economic Area (EEA) and non-EEA countries, which represent more than 10% of the total number of Group employees.

Rate of cover	Collective Bargaining Coverage		Social Dialogue
	Employees – EEA (for countries with >50 employees, which represent >10% of total employees)	Employees – Non-EEA (for countries with >50 employees, which represent >10% of total employees)	Representation in workplace (only EEA) (for countries with >50 employees, which represent >10% of total employees)
0-19%			
20-39%			
40-59%		United States	
60-79%			
80-100%	Spain, France and Italy		Spain, France and Italy

Note: The information included in this table coincides for 2024 and 2025, so the table is own included once.

The percentage of employees not included in the above table corresponds mainly to management personnel of the Group and employees of companies situated in countries where collective bargaining is not widely used, is not contemplated in law or is not applicable under local labour laws, as is the case of the United States, Morocco, India and Cambodia.

In these countries, the professionals are covered by the applicable national labour laws and the Group's internal policies, especially the Ebro Group's Code of Conduct, which lays down the minimum principles regarding labour rights, professional relations, equal treatment and respect for Human Rights.

### Social dialogue

Regardless of the existence of collective agreements, the Ebro Group promotes social dialogue and the workers' participation through different mechanisms, including among others Works Councils, Health and Safety Committees, regular meetings with workers' representatives and direct communication with the HR departments in the different Group companies.

At present, the Group does not have a European works council (EWC), a European Company (SE) works council or a European Cooperative Society (SCE) works council. However, dialogue with workers and their representatives takes place according to the laws and regulations in place in each country and the Group's internal frameworks.

### S1-9. Diversity metrics

\*(66a-e, AR71)

The Ebro Group considers diversity and equal opportunities significant principles in the management of its workforce, in accordance with our Code of Conduct and the applicable corporate policies.

We set out below the principal diversity metrics, focusing on the composition of top management and the distribution of the workforce by age groups.

#### **Diversity in Top Management**

For the purpose of this statement, top management means the executive chairman, who also performs the duties of CEO, the Chief Operating Officer (COO), who is the highest-ranking executive of the Ebro Foods Group after the executive chairman, the heads of the principal business units of Ebro Foods, S.A. and the heads of the Group's business units, regardless of whether their respective employment relationships are specified as top management.

#### Composition of top management by gender

	2025				2024			
	Men		Women		Men		Women	
	No. employees	% Total Top Management	No. employees	% Total Top Management	No. employees	% Total Top Management	No. employees	% Total Top Management
Top Management	12	75%	4	25%	11	73%	4	27%

## Distribution of employees by age group

Age Group	2025		2024	
	No. employees	% Total employees	No. employees	% Total employees
<=30	836	14.08%	782	13.81%
30 - 50	3,068	51.68%	2,900	51.17%
>= 50	2,033	34.24%	1,985	35.02%
<b>Total employees</b>	<b>5,937</b>		<b>5,667</b>	

## Other diversity metrics

At present, the Group does not collect homogeneously other diversity metrics, such as nationality or ethnic origin, from all its companies, in pursuance of the applicable laws on data protection. Consequently, these metrics are not included in this section.

### 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 all the Group companies, wages are above the minimum wage established in each country and are never below that level, ensuring fair, competitive working conditions. This commitment is extended to all the Group's employees and is aligned with the ILO Fundamentals, the UN Global Compact Principles and the corporate policies of the Ebro Group.

The Group considers adequate wages to be any wages equal to or exceeding the minimum wage established by law in each country in which it operates.

### S1-12. Persons with disabilities

\*(79, 80, AR76)

The Ebro Group strives to achieve socio-occupational integration of persons with disabilities through its diversity and equal opportunities policies, in accordance with the applicable laws and the principles established in our Code of Conduct.

#### Direct employment

The Group has employees with different abilities in our workforce, considering all professionals for this purpose, regardless of their recognised degree of disability. The information on the number and percentage of employees with disabilities is set out in the following tables, with comparative figures for 2024 and 2025.

	2025				2024			
	Men	% total employees	Women	% total employees	Men	% total employees	Women	% total employees
Persons with disabilities	73	1.23%	36	0.61%	72	1.27%	34	0.60%

Note: The figures for persons with disabilities may not coincide with those published in Annual Accounts, since this statement includes all persons whose situation of disability has been reported, regardless of whether their degree of disability is equal to or higher than 33%.

### Indirect employment

In addition, the Group contributes towards the socio-occupational integration of persons with disabilities through indirect contracting, mainly through services rendered by special employment centres in countries where this figure is regulated. The information on such contracting is set out in the following tables, with comparative figures for 2024 and 2025.

Centre	Services	Amount 2025 (€)	Amount 2024 (€)
C.E.E. DE MADRID	Printing	3,049	1,672
C.E.E. INSERCIÓN PERSONAL DISCAPACITADOS " IPD"	Cleaning head office in Madrid	80,485	86,845
<b>TOTAL</b>		<b>83,533</b>	<b>88,517</b>

### Integration and accessibility measures

With regard to the universal accessibility and integration of persons with different abilities in work environments, some of the Group companies have developed actions to facilitate their integration, including: (i) elimination of architectural barriers, (ii) ergonomic adaptation of work stations and (iii) adjustment of certain tasks to the specific abilities of individuals.

### S1-14. Health and safety metrics

\*(88a-e, 89c)

The Ebro Group guarantees protection of our employees' health and safety by implementing occupational hazard prevention and management systems in accordance with the applicable laws in each country and the principles promoted by the International Labour Organization (ILO). This approach is integrated within the Group's general framework of personnel management and its Sustainability Plan "Heading towards 2030".

100% of the Group companies and their respective production plants have an Occupational Hazard Prevention and Management System, managed by both internal and external resources. In addition, certain production plants of the Group, such as those of Herba Ricemills in Spain and Pastificio Lucio Garofalo in Italy, have management systems aligned with ISO 45001 on occupational health and safety. In the remaining companies, preventive management is regulated through local policies and collective agreements conforming to the laws in place and the characteristics of each workplace.

### **Participation and representation**

100% of the Group's workforce is covered by an occupational hazard management system, focused on the prevention of work-related risks and continuous improvement in this area, in accordance with the applicable laws.

**Health and safety aspects covered in formal agreements with unions**

The health and safety aspects covered by formal agreements with unions include, on a global level, conformity with the principles promoted by the International Labour Organization (ILO), organisational structures for problem-solving and general commitments regarding the level of practice to apply.

On a local level, these agreements may contemplate, among other aspects, the use of personal protection equipment, the existence of mixed health and safety committees, participation of workers’ representatives in audits, inspections and investigations, training and education in prevention and the right to refuse unsafe work, in accordance with the prevailing laws in each country.

**Health and safety indicators**

The principal health and safety indicators are set out below, with comparative figures for 2024 and 2025.

No fatalities were recorded in 2025 as a result of work-related injuries or ill health, in the Group’s own workforce or in other non-employees working at the Group’s facilities.

	2025		2024	
	No. lost time injuries <sup>(1)</sup>	Injury rate <sup>(2)</sup>	No. lost time injuries <sup>(1)</sup>	Injury rate <sup>(2)</sup>
Own workforce	191	16.89	175	17.54
Supervised workers & independent contractors	43	16.72	29	17.58
<b>Total</b>	<b>234</b>	<b>16.86</b>	<b>204</b>	<b>17.55</b>

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.  
<sup>(2)</sup> The injury rate is equivalent to the number of cases recorded (lost-time injuries) for each million hours worked by the total workforce.

	2025	2024
Work-related ill health <sup>(3)</sup>	11	11
Lost days <sup>(4)(5)</sup>	7,377	9,802

Notes:  
<sup>(3)</sup> The cases of work-related ill health refer to employees.  
<sup>(4)</sup> Lost days refer to work-related injuries and ill health of our employees.  
<sup>(5)</sup> The variation between years is due to the higher number of long-term sick leave cases in 2024.

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 and giving specific training for the hazards of each job. This is supplemented with regular medical check-ups and the promotion of healthy lifestyles.

**S1-16. Remuneration metrics (pay gap and remuneration ratio)**

<sup>\*(97a-c)</sup>

The Ebro Group guarantees equal treatment and opportunities in respect of pay, in accordance with our Code of Conduct, Gender Equality Plan and the Principles of the UN Global Compact.

This commitment is applied to hiring, training, career advancement and pay, ensuring that any differences in pay are not due to discrimination.

To boost this framework, some Group companies have developed specific policies supplementing the corporate guidelines, such as equality plans, equal employment opportunities policies and anti-discrimination, harassment and bullying protocols, described in the corresponding sections of this S1.

Gender-based pay gap

The gender-based pay gap in the Group is managed through the principles of fair and equal pay, in accordance with our Code of Conduct and corporate policies and is part of the global approach to personnel management.

This indicator is tied to the equality and diversity objectives marked in our Sustainability Plan “HEADING TOWARDS 2030”, particularly the targets for progressive reduction of the pay gap and boosting equal opportunities, described earlier in section S-15.

For the purpose of calculation, the gender-based pay gap is determined as the 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 information corresponding to 2025 has been prepared including the highest paid individual, the Chairman and CEO, in keeping with best practices of transparency in respect of pay, even though his relationship with the Company is not one of employment, but commercial. To enable comparison, the 2024 figure has been restated following the same criterion.

In accordance with the comparability requirements established in the CSRD (AR 100), no information for years prior to 2024 is presented, owing to the non-existence of historic data calculated according to a uniform methodology and fully aligned with the current reporting criteria.

	2025	2024
Gender-based pay gap	42.22%	40.33%

Remuneration ratio

The annual total remuneration ratio of the highest paid individual (the Chairman and CEO of the Company, even though his relationship with the Company is not one of employment) to the median annual total remuneration for all employees (excluding the highest-paid individual) was 92.89 times.

	2025	2024
Remuneration ratio	92.89	92.81

## S1-17. Incidents, complaints and severe human rights impacts

\*(103, 104)

The following table shows the Human Rights-related incidents and complaints reported in 2024 and 2025 through channels other than the Corporate Whistleblowing Channel. They include both cases affecting own workforce and those involving workers outside the organisation, that have been processed through local internal channels or by competent external bodies.

Some complaints reported in any given year may still be at the analysis or investigation stage or be solved in subsequent years, depending on the time limits and procedures established by the corresponding authorities or institutions. For this reason, the number of cases settled or concluded within any one year may not coincide with the number of cases presented in the same period.

	No. cases presented	No. cases reviewed	No. cases settled or concluded
Own employees	4	4	4
Supervised workers	-	-	-
<b>Total 2025</b>	<b>4</b>	<b>4</b>	<b>4</b>
Own employees	4	3	6
Supervised workers	1	1	-
<b>Total 2024</b>	<b>5</b>	<b>4</b>	<b>6</b>

Details are disclosed below on the gender of the persons involved, the nature of the incidents and the channel used to report the cases presented in the respective years. As regards the latter point, none of the complaints described was presented through the National Contact Points for OECD Multinational Enterprises.

One of the incidents reported in 2025 was received through a local channel enabled by the corresponding company for its stakeholders to voice their concerns. The remaining complaints were reported to the United States Equal Employment Opportunity Commission (EEOC). The EEOC is a US government agency that has the authority investigate complaints against employers of harassment or discrimination, reported by current or, more often, former employees. Once the company has submitted its Position Statement, the EEOC assesses the case and determines whether there are grounds to continue with the proceedings or whether they should be shelved, as the case may be. These processes can take several months or even more than a year, depending on the complexity of the case and the times set by the agency.

	2025	2024
<b>Gender</b>		
Man	3	1
Woman	1	4
<b>Nature</b>		
Sexual harassment	2	0
Diversity-based discrimination	2	5
<b>Channel</b>		
Internal	1	0
Equal Employment Opportunity Commission (USA)	3	5
Organisation for Economic Co-operation and Development (OECD)	0	0

No serious Human Rights impacts or incidents were identified, or any related with systematic violations within the Group's own workforce. Nor did any of the reported complaints result in penalties, fines or compensations for damages.

# ESRS S2 - Workers in the value chain

List of IROs associated with S2 (SBM-3)

Impacts, Risks and Opportunities						
Code	Description	Impact		VCh	Time Horizon	Policies associated with the IRO
<b>Value Chain Responsible</b>						
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	Up 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	Up 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	Up OO Down	Short term	

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

KEY: VCh
Up: Upstream
OO: Own Operations
Down: Downstream

## SBM-3. Material impacts, risks and opportunities

\*11,12,13

### Scope and groups in the value chain

The Ebro Foods Group operates a global value chain in **Europe, North America, Africa, Asia and Latin America**. The main groups are:

#### 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

#### Downstream

- Logistics providers: geographical areas in which the Group operates

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.

**Social risks identified**

The analysis made with the platform **Countryrisk.io** enabled us to identify significant risks in emerging countries in southeast Asia, India and Pakistan, where labour laws are less developed. The most important risks were:

- **Gender-based inequality:** Women in countries such as Morocco, Thailand and India face barriers to access fair working conditions, owing to sociocultural rules, pay gaps and less access to training.
- **Child and forced labour:** Risk existing in the same geographical areas as above.
- **Work-life balance:** Potential deterioration in regions with no clear regulation of working hours and dates.

Following this risk analysis, in 2025 we began a structured due diligence process to manage and mitigate these risks in the markets identified as priority. This process, aligned with our strategic plan 2025–2027, was scaled in three successive stages: Pakistan (2025), Thailand/Southeast Asia (2026) and India (2027).

The general approach was structured in four working lines:

- **Identification and prioritisation of suppliers with the highest risk levels**, based on turnover, strategic importance and the nature of their commercial relationship
- **Planning and audits**, external and internal, according to the risk assigned and applying internationally recognised standards
- **Enhancing ethical commitments**, through adherence to the Supplier Code of Conduct and the associated ethics questionnaire
- **Mechanisms for monitoring, redress and improvement**, focusing on settling non-compliance and progressive improvement of working conditions in the value chain.

**Stage 1 – 2025: Suppliers in Pakistan**

The first stage of the programme, focusing on Pakistan, was implemented in 2025.

- 100% of the suppliers in the country have adhered to the Ebro Supplier Code of Conduct
- Audits have been made on 90% of the suppliers, representing 94% of the total volume sourced in Pakistan.
- The external audits were mostly made under the SMETA 4 Pillars standard, except in one case, which was audited under the BSCI standard.

Summary of audits made in Pakistan in 2025

Indicator	2025
No. audits made	9
No. suppliers	10
Total no. non-compliance	54
% non-compliance corrected	59%
Total no. critical non-compliance	13
% reduction of critical risks	69%

*\* Note: Some audits that began in one year may be completed in the following year, depending on the how long it takes to make them and validate the corrective action plans.*

## **Stage 2 – 2026: Suppliers in Thailand / Southeast Asia**

The second stage of the process will be carried out in 2026, focusing on the suppliers linked to the Ebro Group in southeast Asia. The methodology used will be equivalent to that applied in 2025, incorporating the lessons learnt in the first phase.

## **Stage 3 – 2027: Suppliers in India**

The third stage of the cycle will be undertaken in 2027, focusing on suppliers in India, according to the three-year planning established. The process will include assessing risks, making audits and developing the corresponding plans for improvement.

This scaled approach will enable us to progress in a gradual, structured, controlled manner to improve the social conditions of our value chain.

## **Material impacts on value chain workers**

The **Double Materiality Assessment (DMA)** did not identify real negative impacts on the workers in our value chain, but it did detect potential impacts that must be monitored.

In the light of these potential risks, the Group drives several initiatives to prevent negative impacts and enhance the well-being of workers in our value chain, paying particular attention to those located in the most exposed stages of the supply chain.

Some of the most significant actions implemented to mitigate risks and use opportunities are:

- **Social and ethics audits** in regions at risk, focusing on detecting child and forced labour
- **Programmes for women** in countries with greater social vulnerability, focusing on improving their access to training and decent working conditions
- **Support for agricultural suppliers** to help them to implement best practices as per the sustainability standards “FSA” of SAI Platform, or “SRP” of the Sustainable Rice Platform, and assistance to obtain certification in Organic Farming or Fair Trade, helping to improve the sustainability of their crops and facilitate their access to new markets
- **Continuing training** in health and safety, new or amended laws and agricultural best practices, enhancing our direct relationship with our 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.

## **Integration in strategy and governance**

These risks and opportunities are integrated in the corporate strategy through:

- **Supplier selection criteria** based on social and environmental standards

- **Supervision by the Sustainability Department**, which regularly reviews the social risks and proposes mitigation plans to Management
- **Indicators and objectives:**
  - o % of suppliers audited under ethical and social criteria
  - o No. women who benefited from training programmes
  - o Reduction of risk of child labour according to Countryrisk.io.

## S2-1. Policies related to value chain workers

\*16,17,18 y 19

S2-1; 18	<b>Supplier Code of Conduct of the Ebro Foods Group</b>
MDR-P 65(a)	<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>
S2-1; 18  S2-1; AR15	<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> <p>-(point 3.4.) <u>Child labour</u>: Children below 15 years of age, or below the minimum age of employment permitted by the ILO conventions shall not be contracted or employed.</p> <p>-(point 3.5.) <u>Forced or compulsory labour</u>: All forms of labour exploitation and forced or compulsory labour are expressly prohibited.</p> <p>-(point 3.6.) <u>Freedom of association and collective bargaining</u>: Suppliers shall recognise their employees' right to form part of collective associations representing workers' interests, in accordance with the applicable laws.</p>
MDR-P 65(b)	<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.</p> <p>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>
MDR-P 65(c)	<p><b>Most senior level accountable for implementation :</b></p> <p>The Audit, Control and Sustainability Committee, which regularly reports to the Board of Directors of Ebro Foods.</p>
MDR-P 65(d)  S2; 19 ; AR14	<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 interests and expectations of our value chain workers were taken into account when drawing up this Policy, considering the information obtained through our usual interactions with suppliers, audits, complaint mechanisms and other monitoring processes. This approach helps to protect labour rights and promote responsible practices throughout our supply chain.</p>

<p><b>MDR-P 65(f)</b> <b>S2; AR16</b></p>	<p><b>Availability:</b> The Supplier Code of Conduct is available on the Group's corporate website (<a href="#">Código-de-Proveedores</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>
<p><b>Sustainability, Environment and Corporate Social Responsibility Policy</b></p>	
<p><b>MDR-P 65(a)</b></p>	<p><b>Contents:</b> 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. 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: "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>
<p><b>S2-1; 18</b></p>	<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, <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.</p>
<p><b>S2-1; 18</b> <b>S2-1; AR15</b></p>	<p>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 SCOC) 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.) <u>Child labour</u>;</li> <li>-(point 3.5.) <u>Forced or compulsory labour</u>; and</li> <li>-(point 3.6.) <u>Freedom of association and collective bargaining</u>.</li> </ul>
<p><b>MDR-P 65(b)</b></p>	<p><b>Scope:</b> 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>
<p><b>MDR-P 65(c)</b></p>	<p><b>Most senior level accountable for implementation:</b> The Board of Directors is responsible for its approval and the Audit, Control and Sustainability Committee for its supervision and implementation</p>
<p><b>MDR-P 65(d)</b> <b>S2; 19; AR14</b></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>
<p><b>MDR-P 65(e)</b></p>	<p>The interests and expectations of our value chain workers were taken into account when drawing up this Policy, incorporating information obtained through our usual interactions with suppliers, as well as observations and data from monitoring and</p>

	compliance processes. This enables us to include significant aspects in the policy to promote responsible working conditions throughout our supply chain.
<b>MDR-P 65(f)</b> <b>S2; AR16</b>	<b>Availability:</b> This Policy is available on the Group's corporate website ( <a href="#">Política-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</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.

## 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 the policies described in MDR-P, the Supplier Code of Conduct and the Sustainability, Environment and Corporate Social Responsibility Policy, which defines the framework for the Group's actions and the requirements applicable to the suppliers in respect of labour standards, fundamental rights, business ethics and environmental criteria.

The detailed contents of these policies are set out in the table included in MDR-P, to which we refer to avoid redundancies.

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

Moreover, and consistent with joining the UN Global Compact, the Group has developed a structured approach to detect, prevent and remedy possible breaches in respect of Human Rights throughout our value chain. This system includes monitoring and control mechanisms, specific training, fostering of best practices and grievance channels. In this regard, the Group has implemented an Internal Reporting System (IRS) that centralises the existing grievance channels and guarantees the protection of whistleblowers who act in good faith, 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.

During the year, there were no significant changes to the policies applied to value chain workers or the mechanisms or types of communication used to inform the people or groups for which they are relevant.

Therefore, the Group still has the same regulatory framework and the same distribution channels described in MDR-P, with no modifications in respect of the previous reporting period.

### S2-2. Processes for engaging with value chain workers about impacts

\*(22,23)

The Ebro Group has several processes and mechanisms enabling it to maintain fluent relations with value chain workers, identify possible impacts and collaborate in their adequate management.

### **1) Tools used**

The Ebro Group uses two tools to gain an insight into the working conditions and respect for Human Rights in our value chain: (i) social audits, which provide information on labour standards and ESG compliance, and (ii) , frequent visits and meetings between the Procurement departments and suppliers and service providers to check compliance with the standards and promote best practices.

### **2) Frequency and methodology**

Interaction with suppliers is constant throughout their trading relationship with us. Audits are valid for 2-3 years, although in critical cases they are done annually.

### **3) Mechanisms to obtain workers' views**

In addition to audits and meetings, the Group incorporates direct interviews with workers during the audits, confidential polls and access to the Corporate Whistleblowing Channel to obtain their views and opinions. These tools ensure that the workers' voices are heard and taken into consideration in decision-making.

Fulfilment of the commitments undertaken by the Group is checked either by engaging directly with suppliers (in the case of individual growers) or with representatives of the supply undertaking (in other cases).

### **4) Processes to remediate impacts**

When a breach is detected, a remediation process is activated, which includes: (i) immediate notification to the supplier, (ii) design of a remedial plan with defined deadlines, (iii) regular monitoring and (iv) possibility of terminating their contract, in cases of serious breach. The affected workers may participate in the definition of solutions through the channels enabled.

### **5) Governance and responsibility**

Subsidiaries' Procurement departments have operational responsibility, while the responsibility for supervision corresponds to the Audit, Control and Sustainability Committee, which regularly reviews the results and reports to the Board of Directors.

### **6) Indicators and monitoring**

To assess the effectiveness of the processes of collaboration, detection and management of impacts, the Group regularly tracks the different operating indicators and results, mainly relating to social audits, coverage of suppliers and handling of any impacts detected.

These indicators enable the Group to monitor the functioning of the mechanisms implemented, identify areas for improvement and guide decision-making on due diligence and social risk management in the value chain. The details of quantitative indicators and their evolution are set out in section S2-4 of this Statement, regarding the measures taken to manage the IROs identified.

### **7) Connection with the strategy**

These processes are incorporated in the Group's strategy and contribute towards guaranteeing a responsible value chain, reducing social risks and strengthening the business model through ethical, sustainable relations with suppliers.

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.

### **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](#).

In connection with its functioning, 18 complaints were reported during the year through this Channel. After assessment, four of them were considered not to correspond to the topics within its scope of application as they referred to issues related with customer services. One duplicated complaint was also identified, finding proof that the same event had been reported more than once, so the duplicate was excluded from the count.

Consequently, a total of 17 complaints were recorded. At year-end, all these cases were closed, except one that was still being investigated. None of the complaints received during the period was made by a value chain worker.

In this regard, Ebro Foods has not specifically assessed whether the workers in our value chain are familiar with and trust the channel as a tool for reporting their concerns. However, the Group ensures access by value chain workers to effective remediation mechanisms through a structured system that combines social audits, grievance channels and remediation processes associated with suppliers.

When a possible breach of labour rights is detected, through external audits, internal audits, meetings with suppliers or the Corporate Whistleblowing Channel, a remediation process is activated that includes formal notification to the supplier, the definition of a corrective action plan with specific deadlines, monitoring by the Procurement and Sustainability departments and, if appropriate, verification audits to confirm closure of any non-compliance detected.

The effectiveness of the mechanisms is assessed through monitoring of the closure of impacts identified, validation of the remedial measures implemented and continuity of the trade relation only once compliance with the standards required by the Group has been proved. If the required compliance levels are not reached, the Group may take additional action, including termination of the contractual relationship.

The procedure, scope and guarantees of the Corporate Whistleblowing Channel are described in detail in section S1-3 of this Statement.

S2-4. Taking measures to manage IROs

\*(32)

**Actions to avoid, mitigate and remediate negative impacts**

**Double Materiality Assessment (DMA)**

The Double Materiality Assessment (DMA) did not identify any actual material negative impacts on our supply chain. However, potential risks were detected related with labour rights, health and safety and forced labour in critical areas.

The actions described are prioritised for the different risks to avoid, mitigate and remediate negative impacts.

**Actions implemented**

The Group uses the Sedex Members Ethical Trade Audit (SMETA) protocol as its main tool, supplemented with frequent meetings and visits by Procurement Departments and the incorporation of best practices in the value chain.

– **Social audits (mainly SMETA)**

SMETA audits include an assessment of labour standards, health and safety, environment and business ethics. Some 99 audits were made during 2025 (74 in 2024) in different countries, including Argentina, India, Thailand, France, Vietnam, Cambodia and Pakistan. Follow-up audits are also made to check the implementation of improvements.

Summary of social audits made in 2025

Indicator	2025
No. audits made	99
No. suppliers	79
Total no. non-compliance	536
% non-compliance corrected	48%
Total no. critical non-compliance	61
% reduction of critical risks	52%

\* Notes:

1) Comparative figures for 2024 are not provided owing to the lack of homogeneity and comparability of the breakdown available for that year as a result of the changes to the Sedex platform.

2) The number of audits made does not necessarily coincide with the number of suppliers audited. This is because: (i) several audits may be made in the same year on the same supplier (e.g. initial and follow-up audits) and (ii) some audits begun in one year may be completed in the following year, depending on how long it takes to make them and validate the corrective action plans.

– **Scope and groups**

These processes are applied to all the groups in the value chain, especially agricultural suppliers and risk areas identified in the DMA. Although no specific actions have been established for vulnerable groups, their situation is assessed in each audit.

– **Remediation process**

Each non-conformity detected is documented in the audit report and in the Corrective Action Plan Report (CAPR). Monitoring includes the defined times, validation of closure and possibility of additional audits. The affected workers participate in the definition of solutions through interviews and the channels enabled.

– **Engagement and best practices programmes**

The Group promotes multi-year programmes to improve working conditions and sustainability, such as training in Climate-Smart Agriculture in India and technical assistance for Basmati producers, promoting safe, sustainable practices.

– **Time horizon and objectives**

Plan 2025-2027:

- (i) Increase the cover of SMETA audits in areas with risk above 80%, the threshold established for the critical suppliers of agricultural raw material according to their volume of purchases
- (ii) Reduce cases of critical non-compliance by 50%
- (iii) Extend training programmes to new countries

– **Indicators and goals (KPIs)**

The following information will be reported annually: (i) no. of audits made, (ii) % critical suppliers who have adhered to the Supplier Code of Conduct (COC), (iii) no. non-compliance cases detected and remediated, (iv) % reduction of risks in critical areas.

– **Continuous improvement plan**

Actions contemplated: (i) digitalisation of CAPR monitoring, (ii) continuing training in Human Rights, (iii) engagement with NGOs to boost local abilities, (iv) updating of SMETA protocols and internal standards.

– **Allocation of resources (CapEx and OpEx)**

The actions taken by the Group to avoid, mitigate and remediate negative impacts on our value chain workers do not have specific allocations of CapEx or separate OpEx budgets for them.

In the case of social audits (SMETA), the Group requires its critical suppliers to register on the Sedex platform and submit to audits according to recognised standards, the cost of such audits being borne by the suppliers. The Group only incurs the corporate costs associated with Sedex membership, included within its general operating expenses. In cases where, owing to the type of supplier or the characteristics of the trade relationship, it is not feasible to make formal social audits, compliance with the labour and social requirements is monitored through visits, meetings and direct verifications made by the suppliers' Procurement departments, using existing internal resources, with no specific additional financial allocations.

The processes of remediation, monitoring of corrective action plans and supervision are managed through the human and operating resources existing in the Procurement and Sustainability departments, with no specific additional financial allocations.

The engagement and best practices programmes are developed within the normal activities of our subsidiaries and, in many cases, in collaboration with third parties, with no specific additional financial allocations distinguished for these initiatives.

**Critical suppliers adhering to the Code of Conduct (COC) in 2025**

Among the actions taken for the management of identified IROs, adherence by the Group’s critical suppliers to the Supplier Code of Conduct is a key control mechanism to ensure compliance with the ethical, social and environmental standards required by the Group of its value chain.

The degree of adherence reached in 2025 is shown below:

	<b>% critical suppliers adhered to the COC</b>	<b>% purchases from critical suppliers adhered to the COC</b>
Agricultural raw materials	66%	82%
Auxiliary raw materials	58%	72%
Logistics	47%	71%
Services	45%	61%

*Note: The Ebro Group considers critical suppliers to be those suppliers within each of the principal supply groups in which a very high proportion of the volume of purchases is concentrated. The identification thresholds are established operationally, generally at concentration levels of 80% or 90% of the volume of purchases, depending on the cases.*

**Engagement and best practices programmes**

The Group develops engagement and best practices programmes designed to improve the environmental sustainability of our agricultural value chain promoting, among other aspects, reduction of emissions, better water management, responsible use of inputs and plant-health products and adoption of more efficient and resilient agricultural practices. These initiatives incorporate an important social component, helping to improve skills and abilities, working conditions, economic revenue and the well-being of workers in the agricultural value chain. They are implemented above all in the different geographical areas in which the Group sources its rice raw material, according to the needs identified and the local context. They are continuing initiatives with no closed time horizon, which are developed progressively. They are mostly organised through multistakeholder initiatives, in collaboration with other partners and specialised third parties, with whom the in situ activities are performed.

The Group participates in these projects through economic contributions agreed separately for each case with the other participants, with no predetermined budget or any specific allocations made in advance, as the cost of each initiative depends on its scope, duration and number of beneficiary groups.

The corresponding subsidiaries and corporate areas involved are responsible for the management, coordination and supervision of the programmes, while they are actually performed jointly by professionals of the subsidiaries and the collaborating partners, according to the scope and nature of each initiative. The details of these projects and their principal environmental objectives and results are set out in section E1-3 of this Statement.

From a social perspective and supplementing this approach, in certain contexts the Group develops specific initiatives to boost compliance with labour standards, safety and skills training for our value chain workers, as described below.

## ■ *Approved Vendor Program*

Through our subsidiary Herba Bangkok, in 2025 the Group continued the Approved Vendor Program begun in 2024, through which it establishes the criteria to be met by all suppliers with which the company operates.

The programme is aligned with the Group's Supplier Code of Conduct (SCOC) and the regulations of the International Labour Organization (ILO). It aims to identify and mitigate key for workers in the value chain, especially health and safety at work or regulation of their working hours.

In cases where high risk levels are detected, the subsidiary is implements further actions, such as training in best practices to progressively improve working conditions.

## ■ *Combat illiteracy in Thailand and Cambodia*

Herba Bangkok and Herba Cambodia have identified illiteracy as a major risk for the workers in their value chain, as it hampers their understanding of labour laws and regulations and effective exercise of their rights.

To tackle this challenge, both subsidiaries implemented literacy programmes in 2024 for the most vulnerable groups, which continued during 2025. These programmes facilitate access to basic information on labour rights and help to build up the skills the workers need to function more securely and autonomously in the working environment.

Apart from these initiatives, which themselves help to generate material opportunities for the Group, in certain situations we are also working on other supplementary actions, designed to promote best practices in the agricultural value chain. These actions include, by way of example, rewarding suppliers for adopting best practices, sharing success stories, developing field safety awareness and training actions and reviewing organisational aspects such as work and rest times, through dialogue with suppliers and in accordance with the applicable laws and regulations.

To conclude this section, it should be noted that no severe Human Rights-related impacts or incidents were recorded in 2025 in the Group's upstream and downstream value chain.

## S2-5. Targets and management of negative impacts

\*(41,42)

The main targets defined by the Group for the management of material IROs impacts in value chain workers are included in our Long-Term Sustainability Plan **HEADING TOWARDS 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, through the due diligence processes and usual interactions with suppliers, along with other mechanisms described in earlier sections.

These targets are implemented and monitored progressively, in line with the social control and supplier management tools and practices applied by the Group to our value chain. With regard to monitoring, although the Group has made social audits and monitoring earlier, the homogeneous definition of criteria, the operational identification of critical suppliers and the systematic consolidation of comparable information are reinforced as from 2025. For this reason, the Group takes 2025 as its operative base line for measuring and monitoring the

targets related to audit cover and adherence to ethical and social commitments in the value chain, reporting progress annually.

Through the social audits and associated monitoring processes, suppliers are informed of any non-compliance detected and the areas for improvement identified, defining corrective action plans and monitoring their implementation.

MDR-T: HEADING TOWARDS 2030 Value Chain Workers						
TARGET	CONTRIBUTION TO IROs	Time Horizon	VCh	Methodology	Achievements	Evolution
100% Social audits on the Group's critical suppliers	<b>Potential Positive Impact:</b> Protection of children's rights and prevention of child labour and forced labour in accordance with the Supplier Code of Conduct	2019 (base year of Plan) 2030 (reference)	Up Down	Established in the SGP of the Ebro Group, HEADING TOWARDS 2030  Making social audits on suppliers identified as critical according to homogeneous operative criteria, reinforced as from 2025	Annual supervision through the Sustainability Statement, assessing progress against the operative base line and closing of non-compliance cases detected	2025: operative base line (data for reporting)  2026-2030: annual evolution (data to be reported)
	<b>Potential Negative Impact:</b> Reduction of exposure to breaches of labour rights deriving from lack of oversight of the working conditions in the value chain	No intermediate landmarks defined				
MDR-T: HEADING TOWARDS 2030 Value Chain Workers						
TARGET		Time Horizon	VCh	Methodology	Achievements	Evolution
100% adherence by critical suppliers to the SCOC/ ethics and social questionnaires of the Group	<b>Potential Negative Impact:</b> Improvement of oversight of compliance with the working conditions required of suppliers in the SCOC/ ethics questionnaire of the Group	2019 (base year of Plan) 2030 (reference)	Up Down	Established in the SGP of the Ebro Group, HEADING TOWARDS 2030.  Adherence to Supplier Code of Conduct (SCOC) as basic requirement for critical suppliers.  When applicable in view of the type of supplier, adherence to supplementary requirements (e.g. ethics questionnaire) included in same commitment framework	Annual monitoring of degree of adherence to the ethics and social commitments required in the supplier control and management policies	2025: operative base line (data for reporting)  2026-2030: annual evolution (data to be reported)
	<b>Potential Opportunity:</b> Improvement of the Group's reputation by establishing trade relations based on ethical and social criteria	No intermediate landmarks defined				

**KEY: VCh**  
Up: Upstream  
OO: Own Operations  
Down: Downstream

**\* Notes**

Although the Plan HEADING TOWARDS 2030 takes 2019 as its base year, the homogeneous consolidation of criteria, operative identification of critical suppliers and availability of comparative information on a Group level have been stepped up as from 2025, which is thus taken as the operative base line for monitoring these targets.

The Plan HEADING TOWARDS 2030 does not define specific intermediate landmarks; progress is reviewed and reported annually.

These targets are not based on conclusive scientific evidence or established with the express engagement of other parties interested, in keeping with their nature as corporate management and control targets defined in the Plan HEADING TOWARDS 2030.

# ESRS S3 - Affected communities

## List of IROs associated with S3 (SBM-3)

Impacts, Risks and Opportunities					
Code	Description	Impact		VCh Time Horizon	Policies associated with the IRO
<b>Affected Communities</b>					
IP-41	Creation of labour, economic and social opportunities in the communities in which the Group has own or trading operations, through the creation of employment in the society.	I+	R	Up 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: VCh
Up: 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 a direct or indirect presence throughout the value chain. This includes:

- Locations where our production plants, logistics centres and corporate offices are situated
- Regions related with suppliers and strategic customers
- Groups that benefit from welfare, educational and environmental programmes promoted by the Group.

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)

This contribution is reflected in the Social Cash Flow, which shows the economic value generated, distributed and retained by the Group in 2024 and 2025.

	2025	2024
<b>Economic value generated</b>		
Net proceeds from operations	748,210	697.667
Sale of assets and businesses	2,411	30.477
Dividends received from third parties	3,504	5.731
	<b>754,125</b>	<b>733.875</b>
<b>Economic value distributed</b>		
Payments to or on behalf of employees	(378,967)	(356.576)
Corporate income tax	(78,308)	(56.701)
Contribution to not-for-profit entities and support for sustainable agriculture	(4,596)	(4.741)
Interest income/expenses	(6,222)	3.097
Business acquisitions	(1,118)	0
CAPEX	(134,871)	(148.634)
Dividends paid (*)	(116,237)	(124.076)
	<b>(720,319)</b>	<b>(687.631)</b>
<b>Economic value retained</b>	<b>33.806</b>	<b>46,244</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.

The initiatives promoted by the Ebro Group (such as the creation of employment, investment in social and educational programmes, support for sustainable agriculture and the promotion of healthy eating habits) generate economic value and, as mentioned earlier, also produce positive impacts on the communities in which we operate. These actions help to strengthen the local socioeconomic fabric, improve quality of life and strengthen our bond with stakeholders.

In the strict scope of the DMA, the only positive impact identified as material is the creation of labour, economic and social opportunities, deriving from the generation of direct and indirect employment and revitalisation of the Group's value chain.

This positive impact is more or less evident depending on the groups and the link in the value chain, benefiting, among others, employees, local suppliers, growers, rural communities, vulnerable groups, unemployed, etc. The diverse effects require an integral approach that

enables us to maximise economic and social value creation while guaranteeing responsible management consistent with the sustainability of the business and well-being of the communities.

With regard to risks, no relatively important risks have been identified in respect of the affected communities. However, the Group remains actively vigilant to forestall any possible adverse scenarios and secure business continuity and relations with stakeholders. This preventive management is based on dialogue channels and mechanisms for community engagement.

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.

This approach underpins the commitment of the Ebro Group to transparency and responsible management, ensuring that although there are no material risks identified, continuous monitoring is maintained to prevent potential impacts and guarantee the sustainability of the business and the well-being of communities.

S3-1. Policies related to affected communities

	<b>Code of Conduct of the Ebro Foods Group</b>
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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> <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>
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 the 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 interests, expectations and concerns of the principal stakeholders potentially affected by the Group's activities were taken into account when drawing up this policy. The usual interactions with local communities, social organisations, institutional representatives and other relevant agents were considered for this purpose, as well as information obtained through existing dialogue and engagement channels. This enabled us to include in the policy the aspects that are most significant for those stakeholders and make sure that the actions contemplated respond coherently to their needs and the context in which we operate.</p>
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>

<b>Sustainability, Environment and Corporate Social Responsibility Policy</b>	
<b>MDR-P 65(a)</b>	<p><b>Contents:</b> 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><u>Principles of action</u> (point 5) for the affected communities are: 5.4. With regards 5.5. With regard to the generation of value for the community</p> <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: - The Group's Social Action Policy develops the criteria for actions in this area, based on the principles of transparency, adaptability and value added. - Actions to be developed directly with Our Community focus mainly on the following areas: (i) social action and cooperation to secure development in the most needy or disadvantaged segments of society; (ii) education, vocational training and entrepreneurship; (iii) implementation in society of sustainable and healthy eating habits (iv) creation of environmental value through the implementation and development of sustainable agricultural systems and other specific environmental projects; (v) donations of the Group's food products; (vi) implementation and development of best practices in our value chain. - 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. - 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.</p>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b> 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> 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> -Universal Declaration of Human Rights -United Nations Guiding Principles on Business and Human Rights -ILO Conventions and Recommendations -Conformity with section 529 ter of the Corporate Enterprises Act ("LSC")</p>
<b>MDR-P 65(e)</b>	(See MDR-P 65(e) of the Group's Code of Conduct)
<b>MDR-P 65(f)</b>	<p><b>Availability:</b> (see MDR-P 65(f) of the Group's Code of Conduct) (<a href="#">Politica-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a> )</p>

<b>Social Policy of the Ebro Foods Group</b>	
<b>MDR-P 65(a)</b>	<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. Social action shall refer mainly to the following areas, without prejudice to any others that may be considered:</p> <ol 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;</li> <li>v. promotion of healthy eating, offering consumers a broad range of Group products focusing on the Health segment.</li> </ol>

<b>MDR-P 65(b)</b>	<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.
<b>MDR-P 65(c)</b>	<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: <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>	No reference is made to universal standards in this policy
<b>MDR-P 65(e)</b>	(See MDR-P 65(e) of the Group's Code of Conduct)
<b>MDR-P 65(f)</b>	<b>Availability:</b> (see MDR-P 65(e) of the Group's Code of Conduct) ( <a href="#">Social Action Policy</a> )

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.

## S3-4. Taking action to manage IROs

\*(31,32c,32d,34<sup>a</sup>,38,62)

In view of the results of its DMA, the Ebro Group has concluded that there are no material negative impacts related to affected communities. The only impact identified as material is positive and consists of the creation of labour, economic and social opportunities in the communities in which the Group has own or trading operations, deriving from the generation of employment and promotion of the local economic activities. This positive impact reflects the Group's commitment to sustainable development and improving well-being in its surroundings, which is the basis on which the actions and resources disclosed in this section are structured.

Based on this material positive impact, the Group has defined specific actions to manage it. It has also driven supplementary initiatives to generate social and environmental benefits in the communities in which it operates. Those actions are described in the following sections, along with the mechanisms established to monitor and assess their effectiveness, and the resources assigned to guarantee their implementation and alignment with our strategic sustainability objectives.

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.

### **Initiatives and commitments to the development of local communities**

In 2025, 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.

With regard to the effectiveness of these actions, there are not always specific impact indicators available, as many of the organisations with which we collaborate do not have formal assessment methodologies or do not provide standardised quantitative information. However, whenever those organisations provide us with qualitative data or indicators of scope, such as the number of beneficiaries or the impact of the programmes, we include them in our annual monitoring. When that information does not exist, we make *in situ* visits to get to know the programme and make an essentially qualitative assessment based on the nature of the project, its alignment with our social and environmental objectives and the solvency and track records of the organisations running them.

The global amount spent on social action during 2025 was €4.6 million, compared to €4.7 million in the previous year.

Social actions	2025	2024
Food donations subsidiaries	1,414,610,99	1,217,151,55
Social action subsidiaries	405,115,82	285,655,17
Ebro Foundation activities	684,630,72	890,084,78
Sustainable Agriculture	2,091,645	2,348,004
<b>Total amount (€)</b>	<b>4,596,003,01</b>	<b>4,740,895,50</b>

\* Note: The 2024 figure for Sustainable Agriculture has been revised in respect of that originally reported, after detecting an error in the information provided by one of the subsidiaries. This correction gave rise to the variation reflected in both that item and in the overall investment figure for the comparative year.

## Food donations

During 2025, Group companies in Spain, UK, Italy, France, India, USA and Canada made food donations for an aggregate value of €1.4 million, delivering 595,917 kg of food. In 2024, 648,584 kg of food was donated for the value of €1.2 million.

Company	2025		2024	
	Amount (€)	Kg	Amount	Kg
Arrozeiras Mundiarroz, S.A.	€504.24	576.00	-	-
Bertagni	€660,820.04	130,562.10	€423,793.23	106,578.82
Ebro Foods Belgium N.V.	-	-	€1,643.33	-
Ebro Foods Netherlands BV	€300.00	108.00	-	-
Ebro India Private Ltda.	€12,426.95	20,400.00	€2,338.88	2,600.00
Ebrofrost Germany, GmbH	€321.00	200.00	-	-
Herba Bangkok S.L.	€309.84	500.00	€1,361.93	2,000.00
Herba Ricemills	€158,880.50	96,633.97	€104,523.52	74,290.54
La Loma Alimentos, S.A.	€2,888.11	3,335.00	-	-
Lustucru Frais S.A.S.	€284,756.00	142,028.00	€101,692.00	212,569.00
Lustucru Riz, S.A.S.	€27,355.83	49,350.00	-	-
Pastificio Lucio Garofalo SPA	€19,293.01	4,139.00	€28,987.72	6,637.00
Riceland Magyarorzag, Kft	€243.86	300.00	-	-
Riviana Foods Canada	€1,329.67	754.56	€17,006.00	14,714.98
Riviana Foods Inc.	€210,885.44	137,765.00	€309,309.10	172,240.15
S&B Herba Foods Ltda.	€16,741.72	955.00	€209,720.49	54,692.00
Tilda Ltda.	€17,554.77	8,310.00	€16,775.35	2,262.00
<b>Total amount (€)</b>	<b>€1,414,610.99</b>	<b>595,916.63</b>	<b>€1,217,151.55</b>	<b>648,584.49</b>

Apart from food donations, some Group subsidiaries develop alternative mechanisms of access to food products, through the sale of products at a reduced price or at cost, in collaboration with third parties.

In this context, **Tilda** collaborates with The Felix Project, an organisation in the United Kingdom that rescues surplus food and redistributes it to charities. In 2025 some 66,000 kg of rice was provided for The Felix Project through discount sales on the normal price, for social redistribution (65,000 kg in 2024). Tilda also sold a further 60,880 kg of rice at cost price to an international press agency within a social initiative promoted by that entity, which subsequently donated the products to vulnerable groups.

**Ebro Foods Netherlands** develops similar initiatives in collaboration with the Amsterdam Food Bank, through the sale of products at a price significantly lower than market price. In 2025, a total volume of 23,783.20 kg of food (83,978.20 kg in 2024) was sold under this scheme.

Similarly, **Riviana Foods Canada** collaborates with different organisations that provide food assistance through the sale of products at a price considerably lower than market price. In 2025, a total volume of 49,076.88 kg of food was channelled through these initiatives, compared to 35,312 kg in 2024, in collaboration with organisations such as MADA Food Bank, Moisson Montréal and Ricochet, thus helping to facilitate access by different communities to stable food products.

## 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 2025 to set up different social and environmental initiatives.

The Foundation worked in three major areas during 2025:

- **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.

To sum up, the contributions made in this area amounted in 2025 to €120,791.17 compared to €133,116.37 in 2024.

- **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 2025 was €468,839.55, compared to €496,968.41 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

towards 2030". In 2025 the Foundation invested €70,000 in these awards, exceeding the €60,000 of the previous year.

Also in this area the Foundation promotes an environmental enterprise project to reduce food loss and waste in the field.

The total investment in this area of action was €95,000 in 2025, compared to €60,000 in the previous year.

In addition to the actions promoted by the Ebro Foods Foundation, the Group subsidiaries develop local social and environmental initiatives adapted to the specific needs of the communities in which they operate. These actions, of a widely varying nature, contribute towards social well-being, community development and enhancement of the living conditions of different groups, supplementing the Group's social action from a decentralised approach aligned with the positive impact identified in the double materiality assessment.

Within this framework, the following actions illustrate the type of social initiatives that the Group subsidiaries develop in their respective local environments:

- **Agromeruan** promotes initiatives to support the local agricultural community, including especially the assignment of an irrigation pump and support for a nursery that serves a community of approximately 700 growers. It also collaborates in actions to improve basic infrastructures, such as cleaning of drainage channels, conditioning of roads in different tribal villages and the construction of a protection dyke, contributing to improving the living and working conditions of the local population.
- **Bertagni** supports social and community initiatives, including contribution to the preparation of the 2025 calendar of the Local Tourism Association, sponsorship of the local football team and support for a solidarity event of free ultrasound and breast scans, promoting cultural development and sport, as well as access to health services in the community.
- **Ebro Foods Netherlands** develops actions to strengthen social cohesion and community well-being. These initiatives include sponsorship of a neighbourhood bus for the elderly and the free assignment of wooden pallets to build cabins for a children's camp.
- **Ebro Frost Denmark** supports different actions focusing on infant well-being, such as collaboration with a local badminton campus for children and contribution to a fund designed to support children with cancer.
- **Ebro India** combines actions related with social development and the strengthening of local communities, including initiatives related with improving agricultural practices and the community environment, such as the prevention of stubble burning and the planting of trees, with positive effects on the health and livelihood of the local population. It also develops social initiatives, such as training growers, financing hearing aids for children in need, paying school registrations, granting the Kalpana Chawla Awards to 30 girls, setting up a sowing centre for 20 women and supporting persons with disabilities.
- **Ebrofrost Germany** promotes several social and community initiatives, including collaboration with a youth employment programme, the provision of equipment for firefighting services, support for scientific research in relation to food and promotion of culture through music schools.

- **Herba Bangkok** supports initiatives related to child well-being and development, such as the organisation of activities in an educational establishment to celebrate Children's Day.
- **Herba Ricemills** supports initiatives that contribute to the social and cultural well-being of its environment, including collaborations with Red Cross and programmes to improve the quality of life of vulnerable groups and areas, as well as encouraging access to culture through local events and associations.
- **Lustucru Frais** focuses its actions on the area of education and equal opportunities. Its initiatives include support for an association that facilitates work experience for students from underprivileged backgrounds, awarding of a grant for female engineers and financing of academic and professional mentoring programmes.
- **Pastificio Lucio Garofalo** offers support to social causes related with health and inclusion, especially initiatives related with the treatment of leukaemia and other serious diseases, and support for economically vulnerable families.
- **Riviana Foods** provides funding for a broad array of community and solidarity initiatives, including collaborations with food banks, contributions to school programmes, financing of university grants and sponsorship of charity sports events. It also provided support to guarantee food for families displaced during the forest fires in California.
- **Tilda** steps up its social commitment by supporting initiatives addressing equal opportunities and access to a decent life. These initiatives include collaboration with an organisation dedicated to boosting the empowerment of women in situations where cultural factors may curtail their personal and professional development and support for an entity that provides school meals for children in Africa, favouring their nutrition and continued presence in the education system.
- **Transimpex** focuses its actions on youth, sport and health, through initiatives such as the sponsorship of youth sports teams, support for camps that help working families achieve a balance between work and family life, and collaboration with projects related to hospitals and health care.

Overall, in 2025 the social actions developed by the Group's subsidiaries in their respective local environments entailed an investment of approximately €405,115.82 (€285,655.17 in 2024).

A further €2,091,645 (€2,348,004 in 2024) was invested by different Group companies in both launching sustainable agriculture programmes in our 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.

To conclude this chapter, it should be mentioned that, just as in 2024, the Ebro Group did not receive any complaints or claims in 2025 regarding possible adverse impacts related to Human Rights in the local communities in which we operate.

### **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.

### S3-5. Targets related to managing material negative impacts

^(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 as we believe that a flexible approach adapted to local situations enables a more effective, significant management of the impacts in the affected communities.

# ESRS S4 - Consumers and end-users

## List of IROs associated with S4 (SBM-3)

Impacts, Risks and Opportunities						
Code	Description	Impact		VCh	Time Horizon	Policies associated with the IRO
<b>Customer Satisfaction</b>						
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	Up 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
<b>Food Safety and Quality</b>						
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
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	Up 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: VCh
Up: 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.

## – Risks and opportunities deriving from the impacts on consumers and end-users

The material impacts identified in the Double Materiality Assessment in relation to our customers and consumers are mainly in food safety and quality, accessibility to products,

transparency of information and trust in the Group's brands. Material risks and opportunities for the Group derive from those impacts, as reflected among the material IROs identified.

The risks deriving from the impacts include, on the one hand, the possible loss of consumer trust as a result of price rises in the end products linked to the volatility of raw material costs, and the risk of regulatory sanctions and impairment of our reputation owing to a possible breach of the standards regarding quality, food safety or information for consumers. New regulatory requirements can also entail increased operating costs and adaptation costs.

At the same time, the same impacts generate material opportunities, such as strengthening consumer trust by maintaining high standards of quality and food safety, and the development of innovative products adapted to new consumer needs, which help to keep customers loyal and expand our business in new markets.

These risks and opportunities generally affect all the Group's customers and consumers, with no distinction identified of different impacts on specific groups, owing to the universal nature of the products we put on the market and the uniform application of quality and safety standards in all the markets in which the Group operates.

The IROs were identified in the Double Materiality Assessment made in 2024, which included consultations with key stakeholders and a review of sectoral risks. The risks resulting from this Assessment are classified by time horizon: short term (price volatility), medium term (regulatory changes) and long term (adaptation to trends in healthy consumption), according to the criteria defined in ESRS 2, considering their likelihood of occurrence and when material effects for the Group could be generated.

In this context, no significant negative impacts related to our customers and consumers were identified, which has been verified through regulatory compliance and the internal control and audit systems established in the Group. The opportunities mainly lie in the strengthening of consumer trust by maintaining high quality and food safety standards and in the development of innovative products adapted to new consumer needs, aligned with the corporate strategy of sustainable growth.

At present there are no specific quantitative metrics at Group level for the aggregate monitoring of these risks and opportunities, although their evolution is monitored at company level through quality, food safety and customer satisfaction indicators used by the different subsidiaries.

In respect of risks and opportunities deriving from dependencies, the Double Materiality Assessment did not identify any specific 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 data protection laws and regulations, or failure to provide an adequate response to consumer concerns or the provision of incomplete or inaccurate information on products, especially in labelling.

The Group has established response mechanisms for all these risks, including especially the Cybersecurity Protocols established, strict compliance with the Data Protection Act, implementation of effective 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 their principal areas of work during 2025 are:

1. **R&D centre in 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. **R&D centre in 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)

<b>Code of Conduct of the Ebro Foods Group</b>	
<b>MDR-P 65(a)</b>	<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>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b> 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>
<b>MDR-P 65(c)</b>	<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>
<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> </ul>
<b>MDR-P 65(e)</b>	<p>The interests and expectations of consumers and end-users have been considered when drawing up this policy, incorporating the information from the usual channels of communication, informal consultations, complaints and observations received through the existing customer service and follow-up mechanisms. This approach has enabled us to incorporate material aspects in the policy to guarantee responsible action aligned with the needs of those using or consuming our products.</p>
<b>MDR-P 65(f)</b>	<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>

<b>Sustainability, Environment and Corporate Social Responsibility Policy of the Ebro Group</b>	
<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>With regard to our customers and consumers, the stakeholder being "<b>Our Public</b>" (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> </ul>

	<ul style="list-style-type: none"> <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>
	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.
<b>MDR-P 65(b)</b>	<p><b>Scope:</b> 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> 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> -Universal Declaration of Human Rights -United Nations Guiding Principles on Business and Human Rights -ILO Conventions and Recommendations -Conformity with section 529 ter of the Corporate Enterprises Act ("LSC")</p>
<b>MDR-P 65(e)</b>	(see MDR-P 65(e) of the Group's Code of Conduct)
<b>MDR-P 65(f)</b>	<p><b>Availability:</b> (see MDR-P 65(f) of the Group's Code of Conduct) (<a href="#">Política-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</a> )</p>

<b>Social Policy of the Ebro Foods Group</b>	
<b>MDR-P 65(a)</b>	<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. 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>vi. assistance and social integration initiatives in the Group's areas of influence;</li> <li>vii. projects related with education and access to employment;</li> <li>viii. donations of food produced by the Group;</li> <li>ix. programmes to develop social and environmental crop standards leading to sustainable farming;</li> <li>i. 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> 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> 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>	No universal standards have been taken as reference to implement this Policy
<b>MDR-P 65(e)</b>	(see MDR-P 65(e) of the Group's Code of Conduct)
<b>MDR-P 65(f)</b>	<p><b>Availability:</b> (see MDR-P 65(f) of the Group's Code of Conduct) (<a href="#">Social Action Policy</a>)</p>

<b>Supplier Code of Conduct of the Ebro Foods Group</b>	
<b>MDR-P 65(a)</b>	<p><b>Contents:</b> The Supplier Code of Conduct (SCOC), 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 SCOC 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>
<b>MDR-P 65 b)</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. 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>
<b>MDR-P 65 c)</b>	<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>
<b>MDR-P 65 d)</b>	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b> -Universal Declaration of Human Rights -United Nations Guiding Principles on Business and Human Rights -ILO Conventions and Recommendations</p>
<b>MDR-P 65 e)</b>	<p>The interests and expectations of consumers and end-users have been considered when drawing up this policy, incorporating the information from the usual channels of communication, informal consultations, complaints and observations related to the supply chain. This approach enables us to ensure that the requirements established for suppliers contribute to responsible action aligned with the needs of those using or consuming our products.</p>
<b>MDR-P 65 f)</b>	<p><b>Availability:</b> (see MDR-P 65(f) of the Group's Code of Conduct) (<a href="https://www.ebrofoods.es/wp-content/uploads/2023/07/Codigo-de-Proveedores.pdf">https://www.ebrofoods.es/wp-content/uploads/2023/07/Codigo-de-Proveedores.pdf</a> ).</p>

## 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 2025 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)
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 Netherland	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, constantly engage with customers and consumers to manage actual and potential impacts identified in the double materiality assessment, especially in food safety, transparency and accessibility. This engagement is structured through multi-format channels (telephone, social media, surveys, e-mails) and market surveys, continuously on digital platforms and quarterly reviews for surveys, covering the principal European and North American markets.

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 to respond to these expectations. Such measures include developing adapted products, including gluten-free and organic options or products enriched with essential nutrients, and starting up nutritional education campaigns in collaboration with NGOs and private entities designed to encourage healthy eating habits in populations at greater risk of exclusion. In addition, through open, constant communication with consumers, we have been able to incorporate improvements based directly on their suggestions, such as adjustments to flavour and texture, clearer instructions for use, modifications to packaging, labelling updates, development of new varieties or flavours and enhanced quality controls, thereby ensuring that our products are increasingly adapted to their needs and expectations.

## Management of complaints and quality systems

The different Quality Departments carry out exhaustive tracking of all complaints received, making detailed analyses thereof. The corresponding quality system is also checked to identify any possible impacts. If an irregularity is detected, the necessary mechanisms are triggered immediately to solve them, thus ensuring compliance with the applicable standards

The following tables show the number of complaints received in 2025 in the B2C and B2B businesses of the Ebro Group. In the B2C business, information is also included for 2024.

**Note:** No comparative information corresponding to 2024 is presented for the B2B business because this information was not available for that year.

**Table 1. B2C business – Complaints (2025)**

Company	No. incidents
Arotz Foods, S.A.	12
Arrozeiras Mundiarroz, S.A.	77
Ebro Foods Belgium, N.V.	1,078
Ebro Foods Netherlands BV	601
Euryza, GmbH	1,054
Geovita Functional Ingredients, S.R.L.	109
Herba Ricemills, S.L.U.	356
Lustucru Frais, S.A.S.	1,024
Lustucru Riz, S.A.S.	759
Mundi Riso, S.R.L.	2
Pastificio Lucio Garofalo, Spa	1,500
Riceland Magyarorzag, Kft	49
Riviana Foods Canada Corporation	2,771
Riviana Foods, Inc.	12,936
Santa Rita Harinas, S.L.U.	5
Tilda International, D.M.C.C.	1
Tilda, Ltd.	1,120

**Table 2. B2C business – Complaints (2024)**

Company	No. incidents
Arrozeiras Mundiarroz, S.A.	81
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
Santa Rita Harinas, S.L.U.	13
Tilda, Ltd.	1,414

**Table 3. B2B business – Complaints (2025)**

Company	No. incidents
Arrozeiras Mundiarroz, S.A.	148
Bertagni 1882, S.P.A.	409
Ebro Foods Belgium, N.V.	74
Ebro Frost Denmark, A/S	18
Ebro India, Private Ltd.	72
Ebro Ingredients, B.V.	380
Ebrofrost Germany, Gmbh	65
Ebrofrost UK, Ltd	8
Euryza, Gmbh	89
Geovita Functional Ingredients, S.R.L.	68
Herba Bangkok, S.L.	12
Herba Cambodia, Co. Ltd	11
Herba Ricemills, S.L.U.	223
La Loma Alimentos, S.A.	8
Mundi Riso, S.R.L.	12
Mundi Riz, S.A.	1
Pastificio Lucio Garofalo, Spa	538
Riceland Magyarorzag, Kft	53
S&B Herba Foods, Ltd.	356
Santa Rita Harinas, S.L.U.	62
Tilda, Ltd.	10
Transimpex, Gmbh	86

#### S4-4. Taking action to manage IROs

\*(62,31c,31d, 33a,33b,35,37)

The actions taken by the Ebro Group to manage the IROs are aligned with the results of the double materiality assessment, prioritising food safety, security of supply, innovation,

cybersecurity and transparency for consumers. These actions are continuous and are supplemented with short and medium-term milestones, such as the extension of strategic agreements and renewal of international certifications.

Effectiveness is assessed through indicators such as:

- % plants certified under ISO/IFS/BRC
- Number of audits completed
- Ratio of complaints
- Average response time (<48 h)
- % solving on first contact (>90%)

The results are reported regularly to the Management Committee of each subsidiary. The actions associated with the management of these IROs are developed within the ordinary budgets of the areas responsible, with no specific financial allocation or aggregate economic monitoring at Group 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**

In the area of R&D and innovation, the Group develops the following lines of work:

- 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, the Ebro Group did not have any severe problems or incidents related with Human Rights in respect of our consumers and end-users in 2025.

#### S4-5. Targets related to managing impacts

\*(81)

The Ebro Group does not currently have any global quantitative targets related to consumers, owing to the diversity of markets, the heterogeneity of product categories and the decentralised structure of our operating model. However, four strategic principles have been established constantly to guide the management of material impacts related with consumer experience:

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

Although there are no global quantitative targets, the Group systematically monitors the effectiveness of our policies and actions related to these principles. This monitoring is integrated in the usual management processes of each subsidiary and are based on:

- Active listening systems through market surveys, satisfaction surveys, trend analysis and the different customer service channels. This information enables us to adapt our strategic principles to the peculiarities of each geographical market.
- Regular performance reviews, based on indicators used by subsidiaries, such as customer satisfaction levels, complaint ratios, response times and internal quality metrics. Although these indicators are not consolidated on a Group level, they do

enable us to assess the evolution and effectiveness of the actions developed in each market.

- Internal continuous improvement processes, in which the results from these systems are presented to the Management Committees of the different companies, enabling the identification of adjustments, improvements and lessons learnt applicable to products, quality processes, labelling and customer services.
- Continuous engagement with strategic customers, distributors and retailers, through regular meetings to review consumer trends, service performance and quality expectations, integrating their feedback in our trading and operating management.

Through these mechanisms, the Group ensures effective control of the IROs related with consumers and end-users and guarantees that the evolution of consumer experience is managed in accordance with the strategic principles established.

Although the Group does not plan to establish Group-level quantitative targets in the short term, we will continue to assess the feasibility of specific market-related targets.

# **GOVERNANCE**

# ESRS G1- Business conduct

## List of IROs associated with GOV-1

Impacts, Risks and Opportunities						
Code	Description	Impact		VCh	Time Horizon	Policies associated with the IRO
<b>Responsible Value Chain</b>						
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	Up OO Down		Group Code of Conduct Sustainability, Environment and Corporate Social Responsibility Policy
IP-60	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.: Forética 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	Up 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	Up 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	Up 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	Up 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: VCh
Up: 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. Board of Directors**

The Board of Directors is the most senior body responsible for application of the Code of Conduct throughout the Organisation and its integration in the corporate strategy.

Its responsibilities 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 complaints.

### **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 whistleblowers acting in good faith
- A process for analysing complaints, led by the Audit Committee and the Compliance Unit

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, participation in webinars and relevant events and monitoring of international standards (OCDE, ONU, ESRS).

## G1-1. Corporate business conduct policies

	<b>Code of Conduct of the Ebro Foods Group</b>
<b>MDR-P 65(a)</b>	<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>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b> The Group COC, as stipulated in point 4, is applicable to: 4.1. Each and all of the Professionals, regardless of their hierarchical level, position and geographical location. 4.2. Customers, suppliers, shareholders and other stakeholders with which the Ebro Foods Group interacts in its operations. 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>
<b>MDR-P 65(c)</b>	<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>
<b>MDR-P 65(d)</b>	<p><b>Disclosure of third-party standards or initiatives to which Group commits:</b> -Universal Declaration of Human Rights -United Nations Guiding Principles on Business and Human Rights -ILO Conventions and Recommendations</p>

<b>MDR-P 65(e)</b>	The interests and expectations of the principal stakeholders were taken into account when drawing up the Code of Conduct, especially employees and executives, suppliers and other business partners, customers, shareholders and society in general, with the aim of establishing common principles of responsible, ethical conduct throughout the Organisation and its value chain
<b>MDR-P 65(f)</b>	<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.

<b>Sustainability, Environment and Corporate Social Responsibility Policy</b>	
<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><u>Principles of action</u> (point 5) 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><u>Specific areas of action</u> (point 6) 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>
<b>MDR-P 65(b)</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>
<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 oversight 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>	The interests and expectations of the principal stakeholders were taken into account when drawing up the Code of Conduct, especially shareholders, employees, customers, suppliers, regulators and society in general, considering the economic, social and environmental aspects related with the performance of the activities of the Group and its value chain.
<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-sostenibilidad-medioambiente-y-responsabilidad-social-corporativa</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>

<b>Policy against Corruption and Bribery of the Ebro Group</b>	
<b>MDR-P 65(a)</b>	<p><b>Contents:</b> 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, "<u>Obligations and prohibited conduct</u>", the Policy prohibits the conduct described below in the following areas, among others:</p> <p>5.1. Fight against corruption, bribery, illegal commissions, influence peddling and money laundering</p> <p>5.2. Gifts and courtesies</p> <p>5.3. Authorities, regulatory bodies and government agencies</p>
	<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>
<b>MDR-P 65(b)</b>	<p><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.</p>
<b>MDR-P 65(c)</b>	<p><b>Most senior level accountable for implementation:</b> The Audit, Control and Sustainability Committee</p>
<b>MDR-P 65(d)</b>	<p><b>Disclosure of third-party standards or initiatives to which Group commits:</b> Act 11/2018</p>
<b>MDR-P 65(e)</b>	<p>The interests and expectations of the principal stakeholders were taken into account when drawing up the Code of Conduct, especially employees and executives, business partners and suppliers, shareholders and public authorities, with a view to ensuring an integral common framework for action compliant with applicable laws in all the Group's operations.</p>
<b>MDR-P 65(f)</b>	<p><b>Availability:</b> This Policy is private and is available in the different intranets of the Group.</p>

<b>Ebro Foods Risk Control and Management Policy</b>	
<b>MDR-P 65(a)</b>	<p><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.</p> <p>In point 4, "Identification of risks", the following points are applicable to Governance:</p> <p><b>4.1. Operating risks:</b></p> <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> <p><b>4.2. Compliance risks:</b></p> <ul style="list-style-type: none"> <li>a. Regulatory risks</li> <li>b. Reputational risks</li> <li>c. Tax risks</li> </ul> <p><b>4.3. Strategic risks:</b></p> <ul style="list-style-type: none"> <li>a. Market risk</li> </ul> <p><b>4.4. Financial risks:</b></p> <ul style="list-style-type: none"> <li>a. Customer credit risk</li> </ul> <p><b>5. Risk control and management system</b></p> <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> <p><b>6. Risk mitigation measures and tolerance</b></p>
	<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>
<b>MDR-P 65(b)</b>	<p><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.</p>
<b>MDR-P 65(c)</b>	<p><b>Most senior level accountable for implementation:</b> The Board of Directors The Audit, Control and Sustainability Committee</p>
<b>MDR-P 65(d)</b>	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b> Code of Good Governance for Listed Companies</p>
<b>MDR-P 65(e)</b>	<p>The interests and expectations of the principal stakeholders were taken into account when drawing up the Code of Conduct, especially shareholders, employees, customers, suppliers, regulators and society, considering the risks that might affect performance and business continuity.</p>
<b>MDR-P 65 f)</b>	<p><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.</p>

## 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.

## **Avoidance of late payments**

Although the Group does not have a formal policy to avoid late payments to suppliers, we systematically apply a practice of making monthly payments to all our suppliers on pre-set dates. (Ver 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 based 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. *(for more information see ESRS-S2)*

### 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:	Ups	Board of Directors	Inherent functions that have always been done  Reports regularly	It is a measure of continuous tracking, control and monitoring  -Propose to the Board possible measures to improve control and/or management
	-Group internal risk control system	OO			
	-Financial information -Risk Management Systems	Down			
MDR-A: Governance					
ACTION		Scope*	Supervision	Time horizon	Measures
Communication and Sustainability Department of the Ebro Group	Develop/complete and monitor:	Ups	Audit, Control and Sustainability Committee	Established since creation of the department	It is a measure of continuous tracking, control and monitoring  -Mitigate and/or avoid risks related to Human Rights and Environment -Analysis of possible improvements in respect of the value chain
	-Country Risk in Human Rights and Environment (countryrisk.io).	OO			
	-Sustainability Indexes that the Group has joined -Due Diligence in Social Responsibility	Down	Risks Committee	Continuous	
MDR-A: Governance					
ACTION		Scope*	Supervision	Time horizon	Measures
Internal Audit Department of the Ebro Group	Supervision of the following activities:	OO	Audit, Control and Sustainability Committee	Inherent functions that have always been done  Continuous	It is a measure of continuous tracking, control and monitoring  -Reports any Non-Compliance
	-Testing				
	-Control of risk management systems -Financial information of our subsidiaries				
MDR-A: Governance					
ACTION		Scope*	Supervision	Time horizon	Measures
Risks Committee of Ebro Foods	Specific unit for:	OO	Audit Committee	Inherent functions that have always been done	It is a measure of continuous tracking, control and monitoring  -Reports any Non-Compliance -Proposes measures to address possible risks
	-Coordination and monitoring of the risk control and management system (including tax risks)	Down	Board of Directors		
	-Control of the Group's financial information -Analysis and evaluation of risks associated with new investments				

<p><b>KEY: Scope</b>          Up: Upstream          OO: Own Operations          Down: Downstream</p>
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The actions described are implemented continuously and are not subject to a specific time horizon, as they form part of permanent improvement and management processes.

The financial information related with these actions is included in their budgets, as they are cross-cutting actions 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.

The company did not identify any material actual negative impacts during the reporting period that had caused harm to persons, communities or other stakeholders, so no remediation actions were required or cooperation in the provision of remediation.

## G1-6. Payment practices

\*(33)

The Ebro Group is committed to prompt payment of suppliers, complying with the applicable laws in each country and promoting business relations based on trust and fairness. Although there is currently no formal policy on responsible payment, the Group has developed a framework that guarantees fair payment times, especially for SMEs, in line with Directive 2019/633 on unfair trading practices.

### Current practices

- Immediate payments in purchases of raw materials from growers and small cooperatives, including advance payments to guarantee loyalty and quality
- Adaptation to local laws:
- EU: payment times of between 30 and 60 days depending on whether the products are perishable or not
- USA: preference for prompt payment

The average payment period of the Group in 2025 was 29.85 days, compared to 28.62 days in 2024. For our Spanish companies, the average payment period estimated in 2025 was 25.9 days, compared to 31.1 days the previous year, as indicated in Note 27 to the 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

## 5.1. Sector-Specific – R&D+I

Impacts, Risks and Opportunities						
Code	Description	Impact		VCh	Time Horizon	Policies associated with the IRO
<b>Sector-Specific: Innovation</b>						
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	<b>R</b>	<b>A</b>	OO	Short term	Code of Conduct of the Ebro Group Risk Control and Management Policy

KEY: Impact
<b>I+</b> : Positive Impact
<b>I-</b> : Negative Impact
<b>O</b> : Opportunity
<b>R</b> : Risk
<b>P</b> : Potential
<b>A</b> : Actual

KEY: VCh
Up: 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 1, paragraph 105, 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

	<b>Code of Conduct of the Ebro Foods Group</b>
<b>MDR-P 65(a)</b>	<p><b>Contents:</b> 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> 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. 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> 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. 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> 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. 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. 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>
<b>MDR-P 65(b)</b>	<p><b>Scope:</b> The Group COC, as stipulated in point 4, is: 4.1. Binding on each and all of the Professionals, regardless of their hierarchical level, position and geographical location. 4.2. Binding on customers, suppliers, shareholders and other stakeholders with which the Ebro Foods Group interacts in its operations. 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>
<b>MDR-P 65(c)</b>	<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>
<b>MDR-P 65(d)</b>	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b> -Universal Declaration of Human Rights -United Nations Guiding Principles on Business and Human Rights -ILO Conventions and Recommendations</p>
<b>MDR-P 65(e)</b>	N/A
<b>MDR-P 65(f)</b>	<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>

<b>Risk Control and Management Policy of the Ebro Foods Group</b>	
<b>MDR-P 65(a)</b>	<p><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.</p> <p><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</p> <p><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.</p>
<b>MDR-P 65(b)</b>	<p><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.</p>
<b>MDR-P 65(c)</b>	<p><b>Most senior level accountable for implementation:</b> The Board of Directors The Audit, Control and Sustainability Committee</p>
<b>MDR-P 65(d)</b>	<p><b>Disclosure of third-party standards or initiatives to which Group commits</b> Code of Good Governance for Listed Companies</p>
<b>MDR-P 65(e)</b>	N/A
<b>MDR-P 65(f)</b>	<p><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.</p>

## 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 omission of information 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.177-181) and S4-4 (pg.188-192).

## 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 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	

Disclosure requirement and related datapoint	Reference in Regulation on the disclosure of information related to sustainability in the financial services sector	Pillar reference	Benchmark regulation reference	EU Climate law reference
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)
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			

Disclosure requirement and related datapoint	Reference in Regulation on the disclosure of information related to sustainability in the financial services sector	Pillar reference	Benchmark regulation reference	EU Climate law reference
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)
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	

Disclosure requirement and related datapoint	Reference in Regulation on the disclosure of information related to sustainability in the financial services sector	Pillar reference	Benchmark regulation reference	EU Climate law reference
<p>ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a)</p> <p>ESRS E1-9 Location of significant assets at material physical risk, paragraph 66(c)</p>		<p>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</p>		
<p>ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)</p>		<p>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</p>		
<p>ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69</p>			<p>Delegated Regulation (EU) 2020/1818, Annex II</p>	
<p>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</p>	<p>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</p>			
<p>ESRS E3-1 Water and marine resources, paragraph 9</p>	<p>Indicator no. 7 in Table 2 of Annex 1</p>			

Disclosure requirement and related datapoint	Reference in Regulation on the disclosure of information related to sustainability in the financial services sector	Pillar reference	Benchmark regulation reference	EU Climate law reference
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			
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			

Disclosure requirement and related datapoint	Reference in Regulation on the disclosure of information related to sustainability in the financial services sector	Pillar reference	Benchmark regulation reference	EU Climate law reference
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			
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 I			

Disclosure requirement and related datapoint	Reference in Regulation on the disclosure of information related to sustainability in the financial services sector	Pillar reference	Benchmark regulation reference	EU Climate law reference
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 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)	

Disclosure requirement and related datapoint	Reference in Regulation on the disclosure of information related to sustainability in the financial services sector	Pillar reference	Benchmark regulation reference	EU Climate law reference
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 2025, by country, gender, age and category:

#### By gender

Gender	2025		2024	
	No. Employees	% Total employees	No. Employees	% Total employees
Men	4,205	70.83%	4,000	70.58%
Women	1,732	29.17%	1,667	29.42%
<b>Total employees</b>	<b>5,937</b>		<b>5,667</b>	

#### By age group

Age Group	2025		2024	
	No. Employees	% Total employees	No. Employees	% Total employees
<=30	836	14.08%	782	13.81%
30 - 50	3,068	51.68%	2,900	51.17%
>= 50	2,033	34.24%	1,985	35.02%
<b>Total employees</b>	<b>5,937</b>		<b>5,667</b>	

## By country

Country	2025		2024	
	No. Employees	% Total employees	No. Employees	% Total employees
Argentina	234	3.94%	222	3.92%
Belgium	240	4.04%	206	3.63%
Cambodia	38	0.64%	46	0.81%
Canada	229	3.86%	274	4.83%
Denmark	101	1.70%	91	1.61%
France	618	10.41%	612	10.80%
Germany	190	3.20%	181	3.19%
Hungary	5	0.08%	5	0.09%
India	237	3.99%	226	3.99%
Italy	896	15.09%	824	14.54%
Morocco	230	3.87%	209	3.68%
Netherlands	88	1.48%	87	1.54%
Portugal	72	1.21%	69	1.22%
Spain	935	15.75%	918	16.20%
Thailand	211	3.55%	211	3.72%
United Arab Emirates	6	0.10%	6	0.11%
United Kingdom	461	7.76%	452	7.98%
United States	1,146	19.30%	1,028	18.14%
<b>Total employees</b>	<b>5,937</b>		<b>5,667</b>	

## By professional category

Professional category	2025		2024	
	No. Employees	% Total employees	No. Employees	% Total employees
Senior management	16	0.27%	15	0.26%
Executives	320	5.39%	310	5.47%
Tech. staff & middle management	993	16.73%	969	17.10%
Administrative & auxiliary staff	949	15.98%	884	15.60%
Factory employees	3,603	60.69%	3,427	60.47%
Others	56	0.94%	62	1.09%
<b>Total employees</b>	<b>5,937</b>		<b>5,667</b>	

## Types and forms of contract

The total number and distribution of forms of employment contract at 31 December 2025 was:

	2025	2024
Permanent	5,512	5,150
Temporary	412	447
<b>Total no. contracts</b>	<b>5,924</b>	<b>5,597</b>

### Average annual contracts by gender

	2025			2024		
	Men	Women	Total	Men	Women	Total
Permanent	3,883	1,617	<b>5,500</b>	3,635	1,479	<b>5,114</b>
Temporary	338	146	<b>484</b>	302	191	<b>493</b>
Part-time	66	120	<b>186</b>	88	97	<b>185</b>

\*Note: The average number of permanent and temporary contracts includes the average number of part-time contracts.

### Average annual contracts by age group

	2025				2024			
	<= 30	30-50	>= 50	Total	<= 30	30-50	>= 50	Total
Permanent	695	2,835	1,970	<b>5,500</b>	621	2,634	1,859	<b>5,114</b>
Temporary	171	235	78	<b>484</b>	179	228	86	<b>493</b>
Part-time	26	66	94	<b>186</b>	14	59	112	<b>185</b>

\* Note: The average number of permanent and temporary contracts includes the average number of part-time contracts.

### Average full-time and part-time permanent contracts

Professional category	2025	2024
Executives	338	302
Technical staff & middle management	944	930
Administrative & auxiliary staff	906	776
Factory employees	3,240	3,049
Others	72	58
<b>Average permanent contracts</b>	<b>5,500</b>	<b>5,114</b>

### Average full-time and part-time temporary contracts

Professional category	2025	2024
Executives	9	10
Technical staff & middle management	15	15
Administrative & auxiliary staff	78	64
Factory employees	380	397
Others	3	7
<b>Average temporary contracts</b>	<b>484</b>	<b>493</b>

### Average part-time permanent and temporary contracts

Professional category	2025	2024
Executives	10	12
Technical staff & middle management	30	26
Administrative & auxiliary staff	80	65
Factory employees	52	67
Others	13	15
<b>Average part-time contracts</b>	<b>185</b>	<b>185</b>

## Number of dismissals by gender, age and professional category

There was a total of 240 dismissals in 2025, as against 236 in 2024. In both years the highest number of dismissals was in factory employees.

	2025						TOTAL
	<= 30		30 - 50		>= 50		
	Men	Women	Men	Men	Women	Men	
Executives	-	1	1	3	0	1	6
Technical staff & middle management	2,00	2	2	1	2	3	12
Administrative & auxiliary staff	2,00	4	3	4	3	5	21
Factory employees	41,00	15	89	24	23	8	200
Others	-	0	1	0	0	0	1
<b>Total number of dismissals</b>	<b>45</b>	<b>22</b>	<b>96</b>	<b>32</b>	<b>28</b>	<b>17</b>	<b>240</b>

	2024						TOTAL
	<= 30		30 - 50		>= 50		
	Men	Women	Men	Men	Women	Men	
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
<b>Total number of dismissals</b>	<b>44</b>	<b>95</b>	<b>44</b>	<b>15</b>	<b>25</b>	<b>13</b>	<b>236</b>

## 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.

### Number of hours training

Professional category	2025	2024
Senior management	147	- (1)
Executives (2)	2,765	6,225
Technical staff & middle management	14,994	13,534
Administrative & auxiliary staff	30,058	26,733
Factory employees (3)	133,899	89,532
Others	278	275
<b>Total hours training</b>	<b>182,141</b>	<b>136,298</b>

(1) The information for this category was not reported in 2024.

(2) The variation in hours training of executives is due to the inclusion of a larger number of employees in this category.

(3) During 2025, training in OHP and Human Rights was stepped up for our factory employees.

## 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	2025	2024
Argentina	73.93%	72.97%
Belgium	100%	100%
Cambodia	100%	100%
Canada	65.50%	64.23%
Denmark	78.22%	77%
France	100%	100%
Germany	0%	0%
Hungary	0%	0%
India	100%	100%
Italy	100%	100%
Morocco	43.04%	39%
Netherlands	100%	99%
Portugal	100%	100%
Spain	100%	100%
Thailand	100%	100%
United Arab Emirates	0%	0%
United Kingdom	9.11%	9.50%
United States	41.97%	39.11%

## 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.

	2025		2024	
	Men	Women	Men	Women
No. lost-day injuries <sup>(1)</sup>	143	48	139	36
Frequency rate	17.81	14.65	19.17	13.20
Severity rate	0.41	0.48	0.54	0.92

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 no. lost time injuries/total no. hours worked) x1000000
- Severity rate = (no. lost days due to injury/total no. hours worked) x1000

	2025		2024	
	Men	Women	Men	Women
Employees with work-related ill health	1	10	2	9

## Hours of Absenteeism

A total of 416,782 hours of absenteeism were recorded for employees of Group companies in 2025, which is a reduction from the 418,475 hours recorded in 2024.

The calculation of absenteeism includes hours not worked owing to non-occupational illness, work-related accidents occurring during working hours, accidents on the way to and from work, work-related ill health and unjustified absence.

## Average remuneration

### Average remuneration by professional category

	2025		
	Men	Women	Average
Executives	€112,461	€80,508	€96,484
Technical staff & middle management	€57,648	€52,971	€55,310
Administrative & auxiliary staff	€41,604	€35,467	€38,536
Factory employees	€33,412	€31,653	€32,532
Others	€32,455	€31,994	€32,225

	2024		
	Men	Women	Average
Executives	€102,413	€87,192	€94,803
Technical staff & middle management	€54,796	€52,513	€53,654
Administrative & auxiliary staff	€36,987	€34,826	€37,726
Factory employees	€37,869	€28,605	€33,237
Others	€28,521	€26,527	€27,524

	2023		
	Men	Women	Average
Executives <sup>(1)</sup>	€110,126	€84,470	€97,298
Technical staff & middle management	€52,662	€46,444	€49,553
Administrative & auxiliary staff	€33,817	€33,749	€33,783
Factory employees	€30,203	€26,461	€28,332
Others	€27,682	€34,344	€31,013

Note: <sup>(1)</sup> The annual gross average remuneration of the Senior Management was included in the category "Executives" in 2023

### Average remuneration of employees by age group

2025			2024			2023		
<= 30	30 - 50	>= 50	<= 30	30 - 50	>= 50	<= 30	30 - 50	>= 50
€36,352	€53,210	€63,491	€35,503	€52,448	€59,124	€34,836	€48,922	€60,229

### Average remuneration of employees by gender

2025		2024		2023	
Men	Women	Men	Women	Men	Women
€55,516	€46,519	€52,117	€45,933	€50,898	€45,094

### Average remuneration of Directors by gender (€ thousand)

2025		2024		2023	
Men	Women	Men	Women	Men	Women
€242.00	€175.00	€245.00	€163.00	€254.00	€179.00

## Average remuneration of Senior Management by gender

2025		2024		2023	
Men	Women	Men	Women	Men	Women
€851,586.94	€128,174.17	€845,942.62	€132,503.45		

\*Note 1: The remuneration of Senior Management does not appear for 2023 because it was contemplated within the professional category "Executives".

Note 2: These calculations include the remuneration of the highest-paid person in the Company, the Chairman and CEO, even though his relationship with the Company is not one of employment.

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.

	2025	2024	2023
Gender-based pay gap	0.16	0.12	0.11

Notes:

(i) We used the following formula to calculate the pay gap:

$(\text{average remuneration men} - \text{average remuneration women}) / \text{average remuneration men}$

## **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 2025, the Ebro Group directly paid more than €85.64 million to the tax authorities in the different countries in which it operates, compared to €64.11 million in the previous year.

## Breakdown of tax payments (€ thousand)

	2025	2024
Income tax (IT) paid	78,308	56,701

## Taxes paid by geographic regions

	2025		2024	
	Net IT	Others	Net IT	Others
Spain	1,266	379	-3,028	455
Rest of Europe	34,214	3,032	39,110	2,927
America	40,960	3,899	18,697	4,011
Asia	1,863	22	1,917	22
Africa	5	0	5	0
<b>Total</b>	<b>78,308</b>	<b>7,332</b>	<b>56,701</b>	<b>7,415</b>

## Most significant countries

	2025		2024	
	IT	Others	IT	Others
Spain	1,266	379	-3,028	455
France	2,647	2,522	9,289	2,429
Italy	18,550	476	15,885	444
United States	37,639	3,751	18,351	3,884
United Kingdom	2,244	0	5,788	0

## Pre-tax profit, by regions (€ thousand)

	Pre-tax profit	
	2025	2024
Spain	10,287	12,212
Rest of Europe	164,204	156,480
America	123,084	121,784
Asia	15,982	14,991
Africa	3,584	3,417
<b>Spain</b>	<b>317,141</b>	<b>308,883</b>

## Most significant countries

	BAI	
	2025	2024
Spain	10,287	12,212
France	37,454	37,765
Italy	45,703	56,891
United States	123,517	119,568
United Kingdom	32,911	23,851

## Government grants received (€ thousand)

	2025	2024
Capital grants received	13,444	1,417
Operating grants received	597	505

## **CORRUPTION AND BRIBERY**

### **MONEY LAUNDERING**

The Ebro Group has established: (i) payment and collection processes and (ii) a structure of powers of attorney 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 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	2025		2024	
Direct consumption	855	75%	873	76%
Indirect consumption	280	25%	275	24%
<b>Total energy consumption (GWh)</b>	<b>1,134</b>		<b>1,148</b>	

## NO<sub>x</sub>, SO<sub>x</sub> 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 2025, the Riviana Foods plant in Memphis reported one minor non-compliance with environmental laws, with no associated economic penalty as they have implemented the appropriate remediation actions.

Company	Plant	Environmental Non-compliance	Remedial Action	Economic value (€)
Riviana Foods	Memphis	Spillage of wastewater from the effluent treatment plant into a drainage channel	Remediation of the property and channel affected	0

## 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	Correct references 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		24-28
Markets in which the organisation operates	(ESRS 2) SBM-1		24-25
Objectives and strategies of the organisation	(ESRS 2)		28-29
Principal factors and trends that may affect its future evolution	(ESRS 2)		31-32
	SBM-2		32-42
	SBM-3		43
	IRO-1		43-56
Reporting framework used	IRO-2		56
	Annex 5.3.		227
Materiality principle	ESRS 2		8
	SBM-2		32-35
Description of the policies applied by the Group	SBM-3		35-42
	IRO-1		43-56
	IRO-2		56
	SBM-1		57-60
The outcome of those policies	SBM-1		57-60
The principal risks related with those issues related to group activities	GOV – 5		21-23
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Management focus: description and outcome of the policies on environmental matters	E1-2		79-80
	E1-3		80-86
	E2-1		100-102
	E2-2		102-104
	E3-1		106
	E3-2		106-107
	E4-2		112-113
	E4-3		113-114
	E5-1		116
E5-2		116-119	
<b>Detailed general information</b>			
Detailed information on the actual and foreseeable impacts of activities on the environment and health	(ESRS 2) SBM-3, IRO-1		35-43, 43-56
	SBM-3 in E1		73-75
	IRO-1 in E1		75-78
	E1-1		72-73
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	IRO-1 in E4 IRO-1 in E5		111-112 115-116
Environmental certification or assessment procedures	E1-3 E2-2 E3-2 E4-3 E5-2		80-86 102-104 106-107 113-114 116-119
Resources employed to prevent environmental risks	Annex 5.3		237
Application of the precautionary principle	Annex 5.3		236
Quantity of provisions and guarantees for environmental risks	Annex 5.3		237
<b>Pollution</b>			
Measures to prevent, reduce or remediate emissions impacting the environment	Annex 5.3		237
Including noise and light pollution			Not applicable
<b>Circular economy and waste management and avoidance</b>			
Waste generated Actions for waste prevention, recycling, reuse, other forms of recovery and disposal	E5-5 (37a) E5-5 39		123-125
Actions to combat food waste Waste generated	E5-2 E5-5		116-119 123-125
Actions for waste prevention, recycling, reuse, other forms of recovery and disposal	E5-2 E5-5		116-119 123-125
<b>Sustainable use of resources</b>			
Water consumption and supply within local limits	E3-2 E3-4		106-107 108-109
Water consumption and supply within local limits	E5-2 E5-4		116-119 120-122
Direct and indirect energy consumption	E1-5 (37) E1-5 (38)		87-90
Actions taken to improve energy efficiency	E1-2 E1-5		79-80 87-90
Use of renewable energies	E1-5 (37) E1-5 (39)		87-90
<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		90-98
Actions taken to adapt to the consequences of climate change	E1-1 (SBM-3) E1-3		73-75 80-86
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<b>Protection of biodiversity</b>			
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<b>Social and Labour Matters</b>			
Management focus: description and outcome of policies on these matters and principal risks related to the issues associated with the Group's activities	SBM-1		24-33
	MDR-P		131-135
	MDR-A		142-145
	MDR-T		145-146
<b>Employment</b>			
Total number and distribution of employees by country, gender, age and professional category	S1-6 (50 a, b) S1-9 (66 b)  <u>** Total number and distribution of employees by professional category</u>  Annex 5.3	-	146-147 149-150  228
	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.		228-229
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.  Annex 5.3.		228-229
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  Annex 5.3.		229-230

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.  Annex 5.3.		233
Pay gap, equal pay for equal work, or average in the company	S1-16 Annex 5.3.		234
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.  Annex 5.3.		234
Organisation of working time	Annex 5.3.  The information to be reported under CSRD does not require disclosure of the implementation of policies on disconnection from work		230
Number of employees with disability	S1-12		150-151
<b>Organisation of Work</b>			
Organisation of working time	S1 (SBM-3) S1-1 S1-8 Annex 5.3.		156-170 131-138 148-149 230-231
Number of hours of absenteeism	The information to be reported under CSRD does not require disclosure of the number of hours of absenteeism.  Annex 5.3.		232
Actions to facilitate work-life balance and co-responsibility	S1-4 Annex 5.3.		142-145 231
<b>Health and Safety</b>			
Conditions of health and safety at work	S1-1 S1-14		151 151-153
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.  Annex 5.3.		151-153  227-228
<b>Labour Relations</b>			
	S1-2		138-140

Organisation of social dialogue, including procedures to inform, consult and negotiate with the workforce	S1-3 S1-2 AR (28, 29)		140-141 138-140
Percentage of employees covered by collective agreements by country	S1-8 S1-8 AR		148-149 148-149
Balance of collective agreements, particularly in the field of health and safety at work	S1-8 S1-14 (88 a)		148-149 151-153
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		131-138 138-140 141-142
<b>Training</b>			
Policies implemented in the area of training	S1-1		131-138
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)		231
<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)		150-151
<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		153-154
Equality plans, measures taken to promote employment, protocols against sexual and gender-related harassment	S1-1 (20, 24 a,b,c) S1-17 (102, 103) S1-17 AR (104 b,c)		136 153-155
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)		150-151
Policy against all forms of discrimination and, where appropriate, diversity management	S1-1 S1-4		131-137 142-145
<b>Respect for Human Rights</b>			
Management focus: description and outcome of the policies related to these matters and the principal related risks	(ESRS 2) SBM-1		29 57-60
Application of due diligence procedures	(ESRS 2) GOV-4 (ESRS 2) MDR-P S1-1 S1-17 S2-1 S3-1 S4-1		20 57-60 131-138 154-155 159-163 173-175 189-194

Application of due diligence procedures in relation to human rights and prevention of risks of violation of human rights and, if appropriate, actions to mitigate, manage and remediate any possible abuse committed	(ESRS 2) MDR-A  (ESRS 2) MDR-T S1-2 / S1-3 / S1-4 S2-2 / S2-3 / S2-4 S3-2 / S3-3 / S3-4 S4-2 / S4-3 / S4-4		S1: 142-144; S2:165-169 145-146 138-145 163-169 175-182 194-200
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<b>Tax Information</b>			
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Corporate income tax paid	The information to be reported under CSRD does not require country-by-country details of income tax paid  Annex 5.3.		234-236
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## 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	Ingredients
Ebro U.K. Limited	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
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, SARLAU	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. B.V	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	
		Euro Rice Handling + Plant E	
	Plant F		
	Netherlands	Plant D	Industrial

Herba Ricemills, S.L.U.	Spain		Industrial	
		Jerez de la Frontera		
		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	
La Loma Alimentos, S.A.	Argentina	Los Charrúas	Industrial	
		Chajarí		
		Los Conquistadores		
		Buenos Aires	Office (lease)	
Lustucru Frais, S.A.S.	France	St Genis Laval	Industrial	
		Lorette		
		Communay		
Lustucru Premium Groupe S.A.S.	France	Lyon	Office (owned)	
Mundi Riz, S.A.	Morocco	Larache	Industrial	
Mundi Riso, S.R.L.	Italy	Vercelli	Industrial	
Pastificio Lucio Garofalo, Spa	Italy	Gagnano	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		
		Colusa		
		Crowley		Warehouse
		S&B Herba Foods, Ltd.	United Kingdom	Fullbourn
Regent				
Santa Rita Harinas, S.L.U.	Spain	Loranca de Tajuña	Industrial	
Tilda International	UAE	Dubai	Office (lease)	
Tilda, Ltd.	United Kingdom	Classic	Industrial	
		Jazz		
Transimpex, GmbH	Germany	Lambsheim	Industrial	
		Lambsheim	Office (owned)	



**Independent Limited Assurance Report  
on the Consolidated Non-Financial  
Information Statement and  
Sustainability Information for the year  
ended December 31, 2025**

**EBRO FOODS, S.A. AND SUBSIDIARIES**



The better the question.  
The better the answer.  
The better the world works.



Shape the future  
with confidence



Shape the future  
with confidence

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28003 Madrid

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## INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT AND SUSTAINABILITY INFORMATION

(Translation of a report originally issued in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the shareholders of EBRO FOODS, S.A.

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### Conclusion of limited assurance

In accordance with article 49 of the Commercial Code, we have performed a limited verification engagement on the Consolidated Non-Financial Information Statement ("NFIS") for the year ended December 31, 2025, of EBRO FOODS, S.A. (the "Entity") and subsidiaries (the "Group"), which is part of the Group's Consolidated Management Report.

The content of the NFIS includes information in addition to that required by prevailing company law in respect of non-financial information, specifically the Sustainability Information prepared by the Group for the year ended December 31, 2025 (the "sustainability information") in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022, as regards corporate sustainability reporting (the "CSRD"). The sustainability information was also subject to limited verification.

Based on the procedures applied and the evidence obtained, nothing has come to our attention that causes us to believe that:

- a) The Group's NFIS for the year ended December 31, 2025 has not been prepared, in all material respects, in accordance with the contents required by prevailing company law and the criteria selected in European Sustainability Reporting Standards ("ESRS"), as well as other criteria described as explained for each subject matter in Annex 5.4. "Index under Act 11/2018" of the NFIS.
- b) The sustainability information, taken as a whole, has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in section "BP-1. General basis for preparation of the sustainability statement", including:
  - That the description of the process for identifying the sustainability information to be disclosed included in section "IRO-1. Description of the processes to identify and assess material impacts, risks and opportunities" is consistent with the process implemented and that it enables the identification of the material information to be disclosed in accordance with the requirements of ESRS.
  - Compliance with ESRS.
  - Compliance of the disclosure requirements included in section "EU Taxonomy" on the environment in the sustainability information with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020, on the establishment of a framework to facilitate sustainable investment.



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## Basis of conclusion

We have performed our limited verification engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Guidelines 47 (revised) and 56 (revised) issued by the Spanish Institute of Chartered Accountants on non-financial information assurance engagements and considering the contents of the note issued by the Spanish Accounting and Auditing Institute (ICAC) on December 18, 2024 (the "generally accepted professional standards").

The procedures performed in a limited verification engagement are less in extent than for a reasonable verification engagement. Consequently, the level of assurance obtained in a limited verification engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those regulations are further described in the *Practitioner's responsibilities* section of our report.

We have complied with the independence and other ethics requirements of the International Code of Ethics for Professional Accountants (including international standards on independence) of the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior.

Our firm applies International Standard on Quality Management (ISQM) 1, which requires us to design, implement, and operate a system of quality management including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

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## Responsibilities of the directors

The preparation of the NFIS included in the Group's consolidated management report is the responsibility of the directors of EBRO FOODS, S.A. The NFIS has been prepared in accordance with the content required by prevailing company law and the criteria selected in ESRS, as well as other criteria described as explained for each subject matter in Annex 5.4. "Index under Act 11/2018" of the NFIS.

This responsibility also includes the design, implementation, and maintenance of such internal control as considered necessary to ensure that the NFIS is free of material misstatement, whether due to fraud or error.

The directors of EBRO FOODS, S.A. are also responsible for defining, implementing, adapting, and maintaining the management systems from which the necessary information for preparing the NFIS is obtained.

In relation to the sustainability information, the entity's directors are responsible for developing and implementing a process for identifying the information to be included in the sustainability information in accordance with the CSRD, the ESRS and Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, and for disclosing information about this process in the sustainability information itself in section "IRO-1. Description of the processes to identify and assess material impacts, risks and opportunities". This responsibility includes:



- ▶ Understanding the context in which the Group carries out its activities and business relationships, as well as its stakeholders, in relation to the Group's impact on people and the environment.
- ▶ Identifying the actual and potential impacts (both negative and positive), as well as risks and opportunities that could affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing, or cost of capital in the short, medium or long term.
- ▶ Assessing the materiality of the identified impacts, risks and opportunities.
- ▶ Making assumptions and estimates that are reasonable under the circumstances.

The directors are also responsible for the preparation of the sustainability information, which includes the information identified by the process, in accordance with the sustainability reporting framework used, including compliance with the CSRD, the ESRS, and compliance of the disclosure requirements included in section "EU Taxonomy" of the section on the environment in the sustainability information with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, of 18 June 2020, on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- ▶ Designing, implementing and maintaining such internal control as the directors consider relevant to enable the preparation the sustainability information that is free from material misstatement, whether due to fraud or error.
- ▶ Selecting and applying appropriate methods for the presentation of sustainability information and the basis of assumptions and estimates that are reasonable, considering the circumstances, about specific disclosures.

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### **Inherent limitations in the preparation of the information**

In accordance with ESRS, the entity's directors are required to prepare forward-looking information on the basis of assumptions and hypothetical assumptions, which must be included in the sustainability information, about potential future events and possible future actions, if any, that the Group could take. Actual results may differ significantly from estimated results, as the reference is to the future and future events frequently do not occur as expected.

In determining the disclosures in the sustainability information, the entity's directors interpret legal and other terms that are not clearly defined and that may be interpreted differently by others, including the legal conformity of such interpretations, and, accordingly, are subject to uncertainty.

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### **Practitioner's responsibilities**

Our objectives are to plan and perform the verification engagement to obtain limited assurance about whether the NFIS and sustainability information are free from material misstatement, whether due to fraud or error, and to issue a limited verification report that includes our conclusions. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this information.



As part of a limited verification engagement, we exercise professional judgment and maintain professional skepticism throughout the engagement. We also:

- ▶ Design and perform procedures to assess whether the process for identifying the disclosures to be included in the NFIS and sustainability information is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of the material information to be disclosed as required in the ESRS.
- ▶ Perform risk procedures, including obtaining an understanding of internal control relevant to the engagement, to identify disclosures where material misstatements are more likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
- ▶ Design and perform procedures responsive to disclosures in the NFIS and sustainability information where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

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### Summary from the work performed

A limited verification engagement involves performing procedures to obtain evidence as a basis for our conclusions. The nature, timing and extent of procedures selected depend on professional judgment, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the NFIS and sustainability information.

Our work consisted of making inquiries of management and of the Group's various business units and components that participated in the preparation of the NFIS and sustainability information, reviewing the processes used for compiling and validating the information presented in the NFIS and sustainability information, and applying certain analytical procedures and performing tests of details on a sample basis as described below:

For verification of the NFIS:

- ▶ Holding meetings with Group personnel to obtain an understanding of the business model, the policies and management approaches applied, and the main risks related to these matters and to gather the information needed to perform the independent assurance work.
- ▶ Analyzing the scope, relevance and completeness of the content of the 2025 NFIS based on the materiality assessment performed by the Group and described in section "IRO-1. Description of the processes to identify and assess material impacts, risks and opportunities" of the NFIS, considering the content required in prevailing company law.
- ▶ Analyzing the processes used to compile and validate the data presented in the 2025 NFIS.
- ▶ Reviewing the disclosures relating to the risks, policies and management approaches applied with respect to the material matters presented in the 2025 NFIS.
- ▶ Checking, through sample testing, the information underlying the content of the 2025 NFIS and whether it has been adequately compiled based on data provided by information sources.

For verification of the sustainability information:



- ▶ Making inquiries of Group personnel:
  - To understand the business model, the policies and management approaches applied and the main risks related to these matters and to gather the information needed to perform the independent assurance work.
  - To know the source of the information used by management (e.g., interaction with stakeholders, business plans and documents on strategy) and review the Group's internal documentation on its process.
- ▶ Obtaining, through inquiries of Group personnel, insight into the entity's processes for gathering, validation, and presenting information relevant for the preparation of its sustainability information.
- ▶ Assessing whether the evidence obtained in our procedures on the process implemented by the Group for determining the disclosures to be included in the sustainability information is consistent with the description of the process included in that information, as well as assessing whether that process implemented by the Group enables identification of the material information to be disclosed in accordance with the requirements of the ESRS.
- ▶ Assessing whether all the information identified in the process implemented by the Group for determining the disclosures to be included in the sustainability information is effectively included.
- ▶ Evaluating whether the structure and presentation of the sustainability information is consistent with ESRS and the rest of the sustainability reporting framework applied by the Group.
- ▶ Performing inquiries of relevant personnel and analytical procedures on the disclosures in the sustainability information, considering those where material misstatements are likely to arise, whether due to fraud or error.
- ▶ Performing, as appropriate, substantive procedures through sampling of selected disclosures in the sustainability information, considering those where material misstatements are likely to arise, whether due to fraud or error.
- ▶ Obtaining, as appropriate, reports issued by accredited independent third parties accompanying the consolidated management report in response to the requirements of European regulations and, in relation to such information and in accordance with generally accepted professional standards, verification, exclusively, of the accreditation of the practitioner and that the scope of the report issued corresponds to that required by European regulations.
- ▶ Obtaining, as appropriate, the documents containing the information incorporated by reference, the reports issued by auditors or practitioners on such documents and, in accordance with generally accepted professional standards, verification, exclusively, that in the document to which the information incorporated by reference refers, the requirements described in ESRS for the incorporation by reference of information in the sustainability information are met.
- ▶ Obtaining a representation letter from the directors and management regarding the NFIS and sustainability information.



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## Other information

The persons in charge of the entity's governance are responsible for the other information. The other information comprises the consolidated financial statements and the rest of the information included in the consolidated management report, but does not include either the auditors' report on the consolidated financial statements or the assurance reports issued by accredited independent third parties required by European Union law on specific disclosures contained in the sustainability information and attached to the consolidated management report.

Our verification report does not cover the other information and we do not express any form of verification conclusion on it.

Our responsibility in connection with our engagement to verify the sustainability information is to read the other information identified and consider whether it is materially inconsistent with the sustainability information or the knowledge we have obtained during the verification engagement that could indicate material misstatements in the sustainability information.

ERNST & YOUNG, S.L.

(Signature on the original in Spanish)

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Alfonso Manuel Crespo

April 10, 2026