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## EBRO FOODS, S.A. About this Report

#### Reporting period

2018

#### Most recent previous report

2017

#### Reporting frequency

Annual

#### Reporting Framework

In this statement we report on the social, environmental and/or economic aspects that are important for the Ebro Group, based on the Global Reporting Initiative (GRI) reporting framework in its GRI Standards.

#### Scope and Coverage of the Reporting

This reporting presents consolidated information on the economic, environmental and social performance of the companies and industrial sites operating the core businesses of the Ebro Group.





The following subsidiaries are included:

COMPANY	COUNTRY	BUSINESS AREA
Arrozeiras Mundiarroz, S.A.	Portugal	Rice
Arotz Foods, S.A.	Spain	Others
Bertagni 1882, S.p.A.	Italy	Pasta
Boost Nutrition, C.V.	Belgium	Rice
Catelli Foods Corporation	Canada	Pasta
Celnat, S.A.S	France	Organic food
Ebro Foods, S.A.	Spain	Parent (Holding)
Ebrofrost Holding, GmbH	Germany, Denmark & UK	Rice, pasta & frozen foods
Ebro India, Private Ltd.	India	Rice
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 Egypt Ricemills, Ltd	Egypt	Rice
Herba Ingredients, B.V.	Netherlands & Belgium	Ingredients
Herba Ricemills, S.L.U.	Spain	Rice
Herba Ricemills Rom, S.R.L.	Romania	Rice
Jiloca Industrial, S.A.	Spain	Others
Lassie, B.V.	Netherlands	Rice
Lustucru Frais, S.A.S.	France	Rice & pasta
Mundi Riso, S.R.L.	Italy	Rice
Mundi Riz, S.A.	Morocco	Rice
Panzani, S.A.S.	France	Pasta
Pastificio Lucio Garofalo, Spa	Italy	Pasta
Riceland Magyarorzag, KFT	Hungary	Rice
Riviana Foods, Inc.	USA	Rice & pasta
Roland Monterrat, S.A.S	France	Ready-to-serve fresh meals
Santa Rita Harinas, S.L.U.	Spain	Others
Stevens&Brotherton Herba Foods, Ltd.	UK	Rice
Vegetalia, S.L.	Spain	Organic food

**NB**: The information on Transimpex (a company in which the Group has a 55% interest) has not been included in this report. This company accounts for 1.43% of consolidated Sales and 1.77% of the consolidated EBITDA.





The following industrial sites (production plants and warehouses) are included in the environmental reporting:

COMPANY	COUNTRY	NAME OF WORKPLACE
Arrozeiras Mundiarroz	Portugal	Coruche
Arotz	Spain	Navaleno
Davida suri	lant.	Avio
Bertagni	Italy	Vicenza
Boost Nutrition	Belgium	Merksem
		Montreal
Catelli Foods Corporation	Canada	Delta
		Hamilton
Celnat	France	Saint Germain Laprade
Ebro India	India	Taraori
Ebrofrost Denmark	Denmark	Orbaek
Ebrofrost Germany	Germany	Offingen
Ebrofrost North America	USA	Delaware
Ebrofrost Uk	UK	Beckley
Fallera Nutrición	Spain	Silla
		Bruno
		Nizza Monferrato
Geovita	Italy	Verona
		Villanova Monferrato
Herba Bangkok	Thailand	Saraburi
Herba Cambodia	Cambodia	Phnom Penh
Herba Egypt	Egypt	Mansoura
	Belgium	Schoten
Herba Ingredients	Netherlands	Wormer
		Coria del Río
		San Juan de Aznalfarache
		Jerez de la Frontera
Herba Ricemills	Spain	Silla
		Algemesí
		La Rinconada
		Los Palacios
Jiloca	Spain	Santa Eulalia
Lassie	Netherlands	Wormer
		Saint Genis Laval
Lustucru	France	Lorette
		Communay
Mundi Riz	Morocco	Larache
Mundiriso	Italy	Vercelli



COMPANY	COUNTRY	NAME OF WORKPLACE
		La Montre
		Gennevilliers
D	France	Nanterre
Panzani	France	Littoral
		Saint Just
		Vitrolles
Pastificio Lucio Garofalo	Italy	Gragnano
		Memphis
		Brinkley
		Clearbrook
		Alvin
		Carlisle
Riviana	USA	Freeport
		Saint Louis
		Winchester
		Hazen
		Fresno
Roland Monterrat	France	Feillens
		Cambridge
S&B Herba Foods	UK	Liverpool
		Orpington
Santa Rita Harinas	Spain	Loranca de Tajuña
Transimpex	Germany	Lambsheim
		Castellcir
Vegetalia	Spain	Jerez de la Frontera
		l

#### Changes in the reporting perimeter in respect of 2017

The main changes in the perimeter for consolidated reporting are the inclusion of the environmental and social performance of Geovita Functional Ingredients, S.r.L. (acquisition of 52% in September 2017) and Bertagni 1882, S.p.A. (acquisition of 70% in January 2018).

#### Contact point for issues regarding the report or its contents

For general issues regarding this report, contact the Communications and Corporate Social Responsibility Department at:

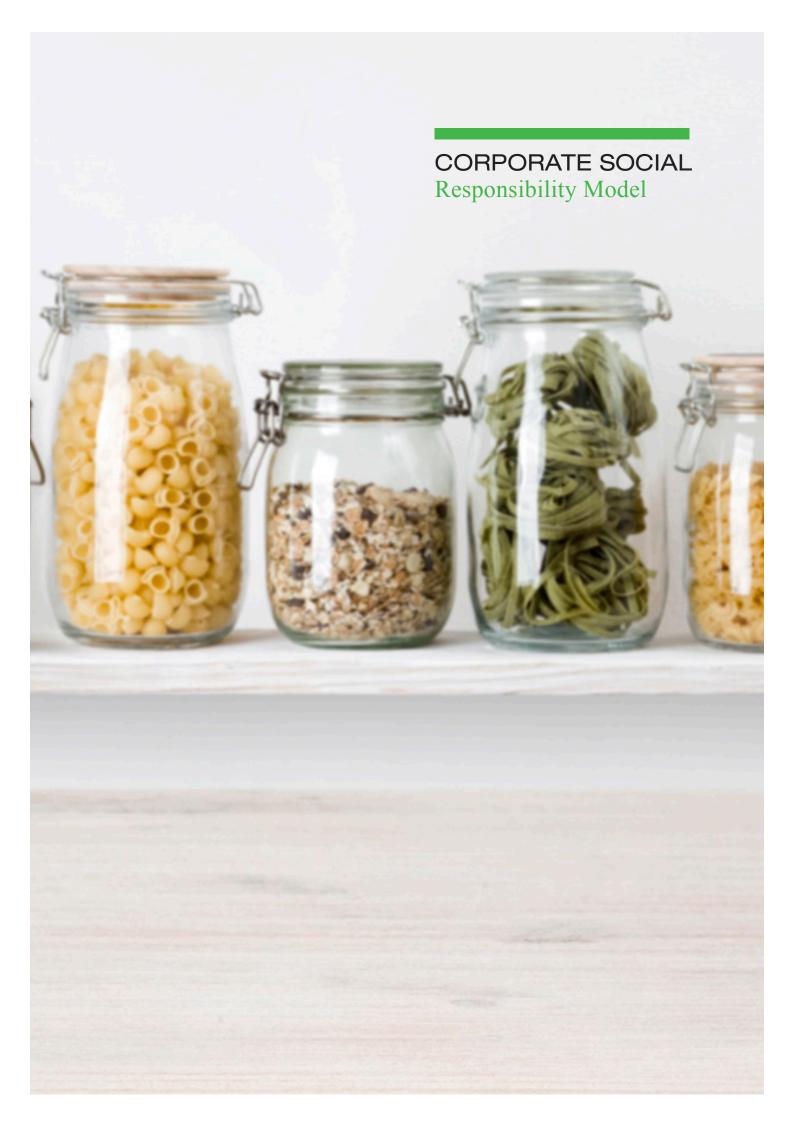
Ebro Foods, S.A.

Comunicación y Responsabilidad Social Corporativa
Paseo de la Castellana, 20 – 3<sup>rd</sup> floor
28046 Madrid
Spain

E-mail: comunicacion@ebrofoods.es

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#### EBRO FOODS, S.A.

### Corporate Social Responsibility Model

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

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

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

- 1. Diagnosis of the sustainability measures taken by the different companies in the Group.
- 2. Detailed analysis of our value chain with a view to identifying the potential risks and impacts, both positive and negative, of our operations. Within this process we have identified three key areas, in which we can make the most valuable contributions to society, as they are inherent in our core business and present throughout the entire chain: (i) nutrition and health, (ii) agricultural development, by promoting and implementing sustainable agricultural practices, and (iii) environmental management.
- 3. Constant dialogue with our internal and external stakeholders, which has enabled us to identify their main concerns and incorporate their suggestions in the design and implementation of the Group's action plans.

The company's main groups of stakeholders are:

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

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



#### STAKEHOLDERS CHANNELS OF DIALOGUE BETWEEN THE EBRO GROUP AND ITS STAKEHOLDERS 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 • Reporting channel of the Code of Conduct (COC) Employees Orporate website and websites of our subsidiaries Corporate Intranet Suggestion box Social media Mailbox Department Days Works Council HR contacts Corporate Communications Department Ocmité de Empresa ▶ Interlocutores de RRHH Departamento de Comunicación Corporativa Annual Report Reporting channel of the COC Customers, consumers and Ocrporate website and websites of our subsidiaries distributors Customer services department • 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)

#### Suppliers

• Corporate website and websites of our subsidiaries

Trade fairs, forums and conferences

• Reporting channel of the COC

- Meetings with the Purchasing Departments of Group companies
- Supplier Code of Conduct
- Regular visits to suppliers
- Surveys
- Assessments through Sedex
- Annual Report

Annual Report

- Social media
- Reporting channel of the COC









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STAKEHOLDERS	CHANNELS OF DIALOGUE BETWEEN THE EBRO GROUP AND ITS STAKEHOLDERS
Society	<ul> <li>Corporate website and websites of our subsidiaries</li> <li>Website of the Ebro Foods Foundation</li> <li>Social media</li> <li>Corporate blog</li> <li>Annual Report</li> <li>Communications and CSR Department</li> <li>Press releases</li> <li>Parent company mailbox (comunicacion@ebrofoods.es)</li> <li>Meetings with NGOs and social action institutions</li> <li>Meetings with local authorities</li> <li>Meetings with resident associations</li> <li>Reporting channel of the COC</li> </ul>
Media	<ul> <li>Corporate website and websites of our subsidiaries</li> <li>Corporate Communications Department</li> <li>Parent company mailbox (comunicacion@ebrofoods.es)</li> <li>Press releases</li> <li>CNMV regulatory announcements</li> <li>Social media</li> <li>Corporate blog</li> <li>Regular meetings with different media</li> <li>Interviews</li> <li>Surveys and questionnaires</li> <li>Annual Report</li> </ul>

4. Materiality analysis: In 2017 we updated our materiality analysis, assisted by Forética. That analysis collected the expectations of our stakeholders (authorities, customers, employees, investors, media, NGOs and suppliers) in Spain, North America, France, Italy, Netherlands, India and Morocco, and from our own corporate administration, represented by the Audit and Compliance Committee.

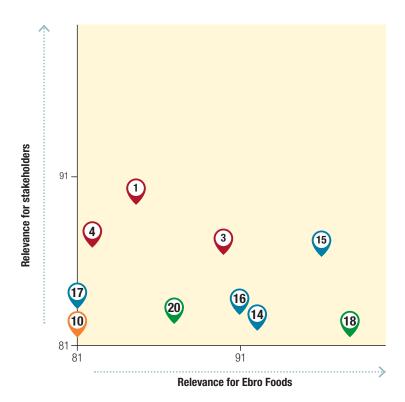
After identifying the principal challenges and opportunities of the Group in respect of sustainability and benchmarking the positioning of other companies in the food sector, we established 23 important topics for consultation, classified into 8 different areas: (i) health and safety of direct and indirect workers, (ii) job quality, (iii) positive social and economic impact on society, (iv) driving force for innovation, (v) promotion of healthy food, (vi) maximising food safety and quality, (vii) implementation of environmental policies and (viii) good governance, integrity and transparency.



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CSR REPORT. CORPORATE SOCIAL RESPONSIBILITY MODEL



#### GLOBAL MATERIALITY MATRIX



Three aspects stand out for their relevance for the organization and its stakeholders:



Maximizing sustainability, quality and food safety all along the value chain



Preventing accidents and damage by enhancing workplace safety (direct and indirect production and distribution employees)



Implementing environmental policies (particularly those related with climate change and responsible water management)

#### HEALTH AND SAFETY OF WORKERS (DIRECT AND INDIRECT)

- 1 Prevent and avoid accidents and damage by improving the safety of direct and indirect jobs
- 3 Promote compliance with human rights throughout the supply chain

#### JOB QUALITY

4 Manage human resources responsibly (equality, work-life balance, diversity)

#### DRIVING FORCE FOR INNOVATION

10 Invest in developing better food solutions for society

#### PROMOTE HEALTHY, SUSTAINABLE FOOD

- 14 Use raw materials based on environmental and social sustainable principles as ingredients for ready-to-serve dishes
- 15 Promote sustainable growing and production of the principal raw materials used
- 16 Foster sustainable good practices throughout the supply chain

#### MAXIMISE FOOD QUALITY AND SAFETY

17 Promote the implementation of management systems and tools to maximise quality and information for consumers

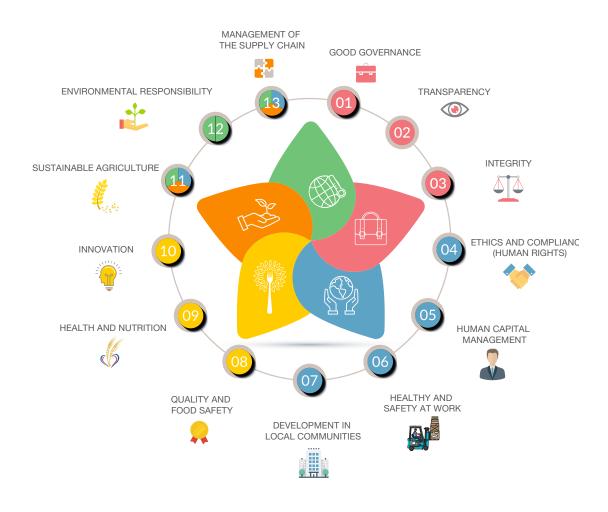
#### IMPLEMENT ENVIRONMENTAL POLICIES

- 18 Make the fight against climate change one of the organisation's focal points
- 20 Develop policies and make investments to reduce and optimise water consumption



Five strategic focal points have been identified through this procedure: Our Team, Our Community, Our Public, Our Shareholders and Our Environment, and five areas for action organised around the economic, environmental, social and governance pillars, namely: Corporate Governance, In&Out Social Well Being, Food and Nutrition, Sustainable Procurement and Climate Change.

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













To secure effective development of these 13 priorities, last December the board of directors of Ebro Foods approved the Global Sustainability Plan "Heading for 2030", with the slogan "Caring for you, Caring for the earth, Caring for food". The Plan lays out the guidelines and action plans to be followed by the Ebro Group from 2019 to 2030 to: (i) implement and guarantee sustainability throughout its value chain, (ii) satisfy the demands and expectations of its stakeholders and (iii) contribute towards achievement of the Agenda 2030.

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CSR REPORT. CORPORATE SOCIAL RESPONSIBILITY MODEL



#### REGULATORY FRAMEWORK

In order to define the general guidelines of the Group and its associates, the Ebro Foods board approved the following policies and principles of conduct:

- 1. Code of Conduct of the Ebro Group
- 2. Supplier Code of Conduct
- 3. Corporate Social Responsibility Policy
- 4. Social Policy
- 5. Risk Control and Management Policy
- 6. Corporate Governance Policy
- 7. Internal Code of Market Conduct
- 8. Policy for Selecting Candidates to be Director
- 9. Senior Executive Remuneration Policy
- 10. Dividend Policy
- 11. Investment and Financing Policy
- 12. Treasury Stock Policy
- **13.** Policy on Communication and Relations with Shareholders, Institutional Investors and Proxy Advisors





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#### ALLIANCES WITH ENVIRONMENTAL AND SOCIAL ENTITIES AND INITIATIVES

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

WE SUPPORT	Signatory of the United Nations Global Compact www.pactomundial.org
aprovéchala no tiene desperdicio	Member of the Redistribution Committee 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>
Seres fundación sociedad y empresa responsable	Member of the SERES Foundation <a href="http://www.fundacionseres.org/Paginas/Inicio.aspx">http://www.fundacionseres.org/Paginas/Inicio.aspx</a>
Miembro de Forética	Member of Forética <a href="http://www.foretica.org/">http://www.foretica.org/</a>
FUNDACIÓN <b>LEALTAD</b>	Member of Fundación Lealtad <a href="http://www.fundacionlealtad.org/">http://www.fundacionlealtad.org/</a>
Secot	Protector member of Fundación Secot <a href="http://www.secot.org/">http://www.secot.org/</a>
SAI	Sustainable Agriculture Initiative (SAI) Platform <a href="http://www.saiplatform.org/">http://www.saiplatform.org/</a>
Sustainable Rice Platform	Sustainable Rice Platform (SRP)  http://www.sustainablerice.org/
COOL FARM ALLIANCE	Cool Farm Alliance (CFA)  https://coolfarmtool.org/cool-farm-alliance/
ecovadis	Ecovadis https://www.ecovadis.com/es/

#### **EXTERNAL ASSESSMENTS**

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



### COMMITMENT TO SOCIETY

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#### EBRO FOODS, S.A.

#### Commitment to Society:

#### A. HUMAN RIGHTS

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

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

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

The Global Sustainability Plan "Heading for 2030" contemplates a specific working area on Human Rights for the coming years, when the principal landmarks on which we will work will be: (i) the due diligence process, to identify the possible impacts of our organisation on Human Rights; and (ii) the establishment of awareness and training programmes.

#### **GRIEVANCE AND FOLLOW-UP MECHANISMS**

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

In addition to the confidential reporting channel, the Human Resources Departments of the different companies in the Group can also process, investigate and solve any incidents that may arise within their respective companies.

Five incidents of discrimination were reported in Riviana Foods (USA) during 2018. One incident has already been investigated and solved by Riviana Foods and the other four are pending solution.

COMPANY	MEN	WOMEN	ADDRESSED	SOLVED	TOTAL GRIEVANCES
RIVIANA FOODS	3	2	5	1	5

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

#### AUDITS MADE AT EBRO GROUP WORKPLACES IN 2017-2018

COMPANY	COMPANY CODE	SITE NAME	SITE COUNTRY	AUDIT DATE	SMETA AUDIT	AUDIT COMPANY	AUDIT SCOPE
HERBA RICEMILLS SLU	ZC1000102	SAN JUAN	SPAIN	8/5/18	No	Intertek	1. Labor, 2. Wages & hours, 3. Health & safety 4. Management systems 5. Environment
HERBA BANGKOK S.L.	ZC1047564	Herba Bangkok NK Plant	THAILAND	14/2/18	Yes	TÜV SÜD (Thailand) Limited	1. Labour Standards
MUNDI RISO SRL	ZC1069772	Mundi Riso	ITALY	18/12/17	Yes	SGS CBE	1. Labour Standards, 2. Health & Safety, 3. Environment, 4. Business Ethics
EBRO FOODS NEDERLAND BV	ZC1004462	Lassie	NETHERLANDS	10/11/17	Yes	Intertek UK	Labour Standards,     Health & Safety,     Senvironment,     Health & Safety,
EBRO FOODS NEDERLAND BV	ZC1004462	Lassie	NETHERLANDS	1/2/17	Yes	Intertek UK	Labour Standards,     Health & Safety,     S. Environment,     Health & Safety,     Servironment,
HERBA INGREDIENTS BV	ZC1049496	Herba Ingredients Belgium B	BELGIUM	23/1/17	Yes	Intertek France	Labour Standards,     Lealth & Safety,     S. Environment,     Business Ethics
HERBA INGREDIENTS BV	ZC1049496	Herba Ingredients Belgium C	BELGIUM	23/1/17	Yes	Intertek France	Labour Standards,     Health & Safety,     Senvironment,     Health & Safety,

#### TRAINING ON HUMAN RIGHTS POLICIES AND PROCEDURES GIVEN DURING THE YEAR

Specific training on human rights has been given in the following Group companies during the year:

COMPANY	NO. EMPLOYEES RECEIVING TRAINING	NO. HOURS	TOTAL EMPLOYEES	% TOTAL EMPLOYEES
EBRO INDIA	123	2	123	100.00%
GAROFALO	134	1	193	69.43%
HERBA BANGKOK	188	1	188	100.00%
HERBA CAMBODIA	6	3	6	100.00%
S&B HERBA FOODS	8	2	104	7.69%

The Ebro Group did not have any security personnel on its payroll during 2018.



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#### ANTI-CORRUPTION AND BRIBERY MEASURES

#### **CORRUPTION AND BRIBERY**

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

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

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

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

The global regulation of the Code of Conduct is backed up locally in the different regions in which the Group operates.

- Description In the principal Spanish companies, the Ebro Group also has a crime prevention model that identifies the potential criminal risks deriving from its activities and the mitigation measures established to try to eliminate (or minimise as far as possible) the risk of committing criminal offences, which include corruption and bribery. The crime prevention model identifies the measures implemented to mitigate the risk of committing offences of corruption, bribery, influence peddling and money laundering. Its effectiveness and application are monitored and checked regularly by the Compliance Unit, within the reporting system of the current crime prevention model. The Compliance Unit is also working on the definition and implementation of training plans for the workers and professionals of the Spanish companies in the Group on the crime prevention model. The plans are to include specific training in matters concerning corruption and are expected to be put into operation during 2019. Apart from this global training, some Spanish subsidiaries have provided their employees with training in the prevention of criminal risks.
- In pursuance of local legislation (Legislative Decree of 8 June 2001) on companies' liability for certain types of offence (including corruption), the Italian companies in the Group have established organisation and management models that include measures to preclude the risk of committing those offences.
- Description In the Group's North American subsidiaries, which account for a very large proportion of the Group's business, there are specific policies and measures to control and mitigate the risk of committing this type of offence. In particular, and in pursuance of the special requirements under local laws, the North American companies have the Anti-corruption, Bribery and Compliance Policy, adapted to US (FCPA) and Canadian (CFPOA) laws on corruption. That policy establishes an Anti-Bribery Compliance Officer, who is responsible for ensuring compliance with the policy and making sure that all workers and executives are aware of and comply with it. Training and refresher courses are provided regularly for this purpose.
- Description The Group's Indian subsidiary has a Vigil Mechanism/Whistleblower Policy, adapted to the applicable local laws (section 177(9) of the Companies Act and Rule 7 of the Companies Rules), through which a communication channel is made available to all employees to report to the company any conduct that infringes the Code of Conduct (in addition to the Group's reporting channel). Through that channel, any possible indication of unlawful conduct

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(including, therefore, any that may be considered acts of corruption) must be reported to the Vigilance and Ethics Officer of the company for investigation and adoption of whatever measures may be necessary.

The board of directors of the parent is due to pass a specific policy on corruption during 2019, which will set out the general principles specifically and separately and develop the applicable regulation of the Code of Conduct on this issue.

Moreover, the Ebro Group companies Riviana Foods, Catelli Foods Corporation and Ebro India, Private Ltd. provided anti-corruption training in 2018 for all their employees.

No cases of corruption have been reported in any companies of the Ebro Group or any of their business partners.

#### MONEY LAUNDERING

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

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

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

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

#### **PUBLIC POLICY**

The Ebro Group declares its political neutrality and establishes in its COC the prohibition for its professionals to make any contributions to political parties, authorities, organisations, public administration and institutions in general in its name or on behalf of any of the companies in the Ebro Group.

All relations with the authorities, regulatory bodies and government departments are conducted according to the principle of maximum cooperation and transparency, without prejudice to defence of the Group's legitimate interests.



#### SOCIAL CASH FLOW

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.

(000€)	2018	2017
Economic value generated		
Net turnover	2,646,523	2,506,969
Other income	39,332	44,808
Interest income	22,862	35,505
Share of profits of associates	5,017	4,290
	2,713,734	2,591,572
Economic value distributed		
Consumption & other external expenses	(1,462,269)	(1,331,011)
Employee benefits	(360,496)	(338,975)
Other operating expenses	(553,870)	(528,711)
Interest expense	(31,628)	(46,562)
Corporate income tax	(63,639)	(34,157)
Net income from discontinued operations	0	0
Contribution to not-for-profit entities	(2,280)	(2,315)
Dividends(*)	(95,566)	(93,771)
	(2,569,748)	(2,281,731)
ECONOMIC VALUE RETAINED	143,986	309,841

<sup>(\*)</sup> Dividends paid in the corresponding year

#### COMMITMENT TO PUBLIC ADMINISTRATION

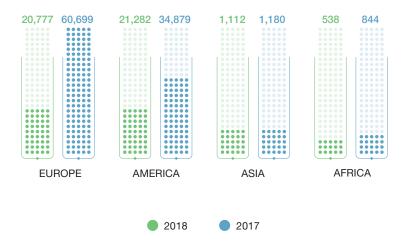
With a view to guaranteeing responsible compliance with the tax laws in place in the jurisdictions in which it operates, the Ebro Group has developed principles to secure transparent, honest tax management and payment of taxes.

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 activities in any of the jurisdictions included on the list of tax havens, incorporated in Spanish law through Supplementary Provision 1 of the Tax Fraud Prevention Measures Act 36/2006, as amended by Final Provision 2 of Act 26/2014 of 27 November.

In 2018, the Ebro Group directly paid €43.7 million to the tax authorities in the different countries in which it operates.



#### BREAKDOWN OF TAXES PAID BY GEOGRAPHICAL AREAS (000€)



#### TYPE OF TAXES PAID



#### **REGULATORY COMPLIANCE**

None of the companies in the Ebro Group has been fined for non-compliance with the law or regulations, or received any grievances about impacts on society.







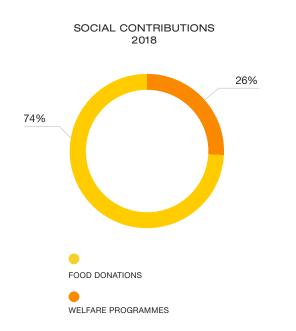


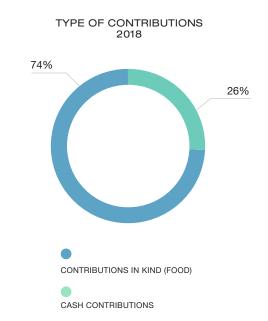
#### COMMITMENT TO THE DEVELOPMENT OF LOCAL COMMUNITIES

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

Through the Ebro Foundation and its different companies, the company allocated over €2,280,000 to implementing this commitment in 2018. The Ebro Group and the Ebro Foundation have participated in projects created by different not-for-profit organisations and promoted and developed motu proprio initiatives of social and environmental interest.

The Ebro Group has not received any grievances or claims regarding possible negative impacts on the local communities in which it operates.





#### DONATIONS OF FOOD

One of the Ebro Group's main lines of social action is the donation of food, either to the food banks in the principal countries in which it operates or to different welfare organisations and associations, mainly in Spain.

#### **Donations to food banks**

Total donations to food banks by Group companies in Spain, France, USA and Canada amounted to over €1,650,000 in 2018.

COUNTRY	COMPANY	AMOUNT (€)
Spain	Herba Ricemills	89,915.00 €
USA	Riviana Foods	982,712.00 €
Canada	Catelli Foods	106,021.00 €
France	Panzani	511,021.00 €
TOTAL		1,689,669.00 €



In Spain, as well as food deliveries to different food banks by Herba Ricemills, the Ebro Foundation also contributed €100,000 in cash to the Spanish Federation of Food Banks (FESBAL) to buy the boxes used for the massive food collection organised at the end of November 2018.

#### FOOD DONATIONS BY GEOGRAPHICAL AREA



#### RATIO OF TURNOVER TO DONATIONS TO FOOD BANKS (BY GEOGRAPHICAL AREAS)

COUNTRY	TURNOVER (000€)	DONATIONS (€)	%
SPAIN	176,005	89,915	0.05%
USA	825,205	982,712	0.12%
CANADA	131,782	106,021	0.08%
FRANCE	782,198	511,021	0.07%

#### **WELFARE PROGRAMMES**

In its determination to contribute to sustainable development of the communities in which it operates, the commitment to society of the Ebro Group and the Foundation is also developed through social initiatives set up in the following areas:

- Food and nutrition
- Education and employment
- Sustainable agriculture
- Social welfare in regions of interest

A very large proportion of these actions are carried out by the Ebro Foundation.

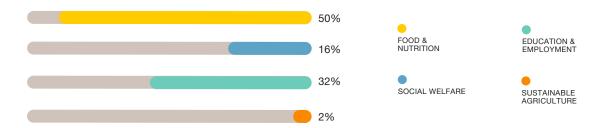




#### **EBRO FOUNDATION IN FIGURES 2018**



#### TYPES OF WELFARE PROGRAMMES



#### PRINCIPAL ACTIVITIES OF THE EBRO FOUNDATION AND THE EBRO GROUP IN 2018

#### 1. WELFARE PROGRAMMES IN FOOD AND NUTRITION

#### Social assistance and school meal grants

Our collaboration in this area has focused not only on monetary contributions to soup kitchens and social assistance organisations to buy food, but also on paying school meal grants for children at risk of social exclusion.

Some of these actions are described below:

#### **Seville**

- San Juan de Acre soup kitchen, run by Orden de Malta. This soup kitchen, promoted by the Andalusian Delegation of Orden de Malta, has served more than 310,000 meals over eight years with an average number of daily users of 564. It now provides important support for numerous families in the capital of Andalusia
- San Vicente de Paul soup kitchen, monetary contribution to buy food for the soup kitchen. In addition to the soup kitchen, it has other services such as hygiene, information and welfare guidance, etc. They assist 350 people on average a day.
- San Juan de Dios soup kitchen in Seville: monetary contribution to buy food for the soup kitchen and to deliver food to persons in need. The soup kitchen, open from Monday to Friday, is able to provide meals for 120 people a day. In 2018, the soup kitchen served 17,329 meals and assisted 533 people (30% women and 70% men). Food is handed out to families with dependent children and/or elderly, previously assessed by the centre's social worker, establishing food deliveries according to the number of members of each family unit. They are given food once or twice a month. The number of deliveries rose in 2018, from 1,266 deliveries in 2017 to 1,646 deliveries of food in 2018, assisting 190 families each month equivalent to 665 individuals benefiting from this service. Overall, some 96,695 kg of food has been handed out over the year.



- Seville Food Banks: :participation in the "Have smiles ready" campaign, the main aim of which is to raise funds to enable the food banks in Andalusia, Ceuta and Melilla to continue their daily work, assisting over 400,000 people.
- School meal grants at the Corpus Christi School: through the Fundación de Enseñanza Victoria Díez, focused on helping to meet the basic needs of children whose families have no income, financing 12 grants for school meals to ensure that these children have a balanced diet.

#### **Madrid**

- Description Economic assistance for the soup kitchen in the Vallecas district of Madrid, run by Asociación Manos de Ayuda Social, aiming to offering correct nutrition while providing elements for healthy eating habits and promoting a warm environment where people at the risk of social exclusion feel welcome, finding ways to help them to find a job and participate in society. Over 13,200 kg of food was distributed in 2018.
- Economic contribution to the NGO Olvidados to buy food for underprivileged families. Overall, some 2,000 families in the southern districts of Madrid have benefited from this assistance. Nappies and hygiene products were also bought. Food was distributed in all cases based on criteria of vulnerability of the families and the number of children. The people in charge of the centres know the families and their needs and guarantee fair distribution.
- Economic donation to Fundación San Juan del Castillo Pueblos Unidos to buy food for their shelters, where they house 40 sub-Saharan refugees, feeding them, providing shelter, offering hospitality and defending their rights.
- Monetary donation to Orden de Malta to buy food for the Virgen de la Candelaria soup kitchen in the San Blas district. The centre is situated in San Blas, one of the poorest districts of Madrid, with high unemployment rates, aged population, low social and economic status, low incomes and a huge increase in the percentage of immigrants, together with jobless rates that are far higher than those found in the rest of the city. Consequently, this district has keenly felt the effects of the crisis and cuts in social services. The soup kitchen serves approximately 120 people six days a week (Monday to Saturday) from 17:00 to 19:00. Its activities are only suspended in the summer months. Some 10-15 volunteers work there every day.
- Asociación Achalay: economic assistance to buy food. This programme was set up at the end of 2012, in the light of the huge impact of the economic crisis on the San Blas district in Madrid. Staple food is provided for families on a monthly basis, prioritising assistance and following up each case with a view to supporting the inclusion process designed for each household. Eleven distributions of food were made in 2018, with the participation of 29 volunteers.
- Collaboration in the "No child without a moustache" campaign promoted by La Caixa and the Spanish Federation of Food Banks. Over one and a half million litres of milk were obtained for this campaign, between physical collections and monetary contributions. 30,000 4-member families at risk of social exclusion will receive the recommended minimum milk consumption (one litre per person per week) for three months.

#### L'Aldea (Tarragona)

School meals grants for 28 pupils through Cáritas Parroquial de L'Aldea (Tortosa). The project offers economic support for families to guarantee stable food adapted to the children's needs at least once a day, and economic support to buy books and school materials.

#### **Valencia**

▶ Economic support to the NGO Nueva Acrópolis for its soup kitchen and the distribution of food among those most in need.. During 2018, 5,236 lots of food were handed out to families in need and 40 people on average a day have eaten at the soup kitchen.





• Economic assistance for Asociación Ayuda una Familia to buy staple food for families at risk of social exclusion. The number of beneficiaries was 30.

#### Malaga

Friendly Police: Solidarity trip to Mauritania, Mali and Burkina Faso to deliver directly to the children 4,000 kg of non-perishable food (rice, pasta, pulses, powdered milk, etc.), as well as school materials and clothes.

#### **Southern Sudan**

Through the NGO Africa Direct, the Foundation has provided economic support for the purchase of food (rice, flour, corn, milk) at the refugee camp in Mantgateen, southern Sudan. The beneficiaries included 300 children, 100 young pregnant women and 100 breastfeeding mothers.

#### Food and nutrition programmes

Participation in programmes that combine food and health, food and social development, and food and environmental sustainability.

The best examples of this area of action in 2018 were:

#### Seville

- ▶ Ebro-Alalá School of Well-Being, a transversal programme concerning food and health developed jointly by the Ebro Foundation and the Alalá Foundation in the Polígono Sur district of Seville. This programme offers children and their families tools for healthy living and useful information on nutrition and the benefits of sport. The project has three primary goals:
  - 1. Make people aware how necessary it is to be healthy, have a balanced diet and do some sport.
  - 2. Encourage physical activity among children, especially among children with disorders such as obesity.
  - 3. Offer a better future for children, youths and their families at risk of social exclusion through healthy habits and sport.

#### Barcelona

The PrevenGO Programme, a Group Programme to Treat Obesity provided by the Endocrinology and Sports Medicine Unit of Hospital San Juan de Dios in Barcelona was started up through the Theodora Foundation. Depending on the results achieved, it is planned to extend this programme to hospitals in Madrid and Seville.

#### **Madrid**

- Ebrosalud.es, an integral education project aimed at pupils in the 3rd and 4th years of Primary Education, showing the children how necessary food is for their physical and intellectual development and promoting healthy habits as essential for good growth. One of the most innovating elements of this project is that it also seeks to stimulate children's creativeness using the methodology and materials of LEGO Education. During the workshop, each child builds his/her SOS Commitment, explaining what they will do to encourage and maintain a healthy lifestyle in their families. All these commitments can be visited at <a href="https://www.arrozsos.es/compromiso-sos/">https://www.arrozsos.es/compromiso-sos/</a>. Over 2,400 children participated in this activity in the region of Madrid during 2018.
- Gastronomix and Sweet Gastronomix, a personal, innovative, free training project in cooking, creative gastronomy and recycling, for 50 young people aged 16-23 in a situation of social exclusion. Developed by Fundación La Casa y el Mundo and financed by the Ebro Foundation, the programme has just received the Injuve Young Talent seal in recognition of the promotion and fostering of young talent in education and inclusion.

The global investment made in the Food and Nutrition Area in 2018 was €293,862.

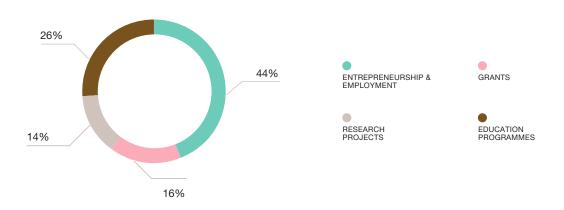


#### 2. EDUCATION AND ENTREPRENEURSHIP

This part of the Foundation's work comprises four activities: scholarships, research projects, educational programmes and entrepreneurship and job promotion initiatives.

The overall investment in this area was €183,592, distributed as follows:

#### TYPE OF ACTIVITIES



#### Grants and scholarships

#### Seville

Description Brillante Scholarships at the Loyola Leadership University: one scholarship per student per year, up to a total of three

#### Madrid

- ▶ Javeriana Vocational School: Financing of three Erasmus grants for the Advanced Vocational Course in International Trade for young people with scarce resources.
- Financing of a dual-degree Alumni Scholarship through the Universidad Carlos III in Madrid: This scholarship is intended for young students from outside Madrid with good academic records and scarce resources, to enable them to study at Universidad Carlos III.

#### India

- Award of 10 scholarships to the best female tenth-grade students in the State of Haryana, where our Ebro India plant is situated.
- The Ebro Foundation, in collaboration with Ebro India, is providing financial support for 6 students in vulnerable situations at two industrial training schools near our plant, so that they can subsequently study a university degree. The students have been selected according to a scale established by the heads of the schools and Ebro India, which has set up an internal committee to oversee the project.



#### Research

#### **Barcelona**

• Fero Foundation: financial contribution for a cancer research grant.

#### **Seville**

cicCartuja-Ebro Foods Research Award: The cicCartuja-Ebro Foods awards are granted for work done by young researchers, aged under 31, who published the findings of their work in high-impact international journals in the areas of Chemistry, Biology and Material Science during 2017. Through this initiative, the company and the public at large are informed of scientific activities carried out by young talent in cicCartuja, stressing the social nature of science, conceived by and for citizens.

#### **Education Programmes**

#### Seville

Once again, the Ebro Foundation has renewed its commitment to the Balia Foundation for its project in Seville targeting the social and educational development of children and adolescents in a situation of poverty. This project seeks to boost the talent and abilities of children and adolescents at risk of exclusion through education in values, so that they have a chance to become integrated adults and contribute to the economic and social benefit of the community. It is run in the Tres Barrios-Amate district of Seville, owing to the demand there and the high levels of children leaving school early.

#### Isla Mayor - Seville

Contribution to the Félix Hernández Infant and Primary School (CEIP) for the purchase of teaching materials for children with special educational needs.

#### Benifaió - Valencia

Denifaió Town Council, school back-up project for children aged 6-12 in the town at risk of exclusion. The programme focuses on developing adequate study habits and acquiring social skills, working with a group of around 20 children, adding two additional lines of personal development: learning through leisure and free time activities and a conflict resolution workshop, placing emphasis on mediation in conflictive situations.

#### **Madrid**

- Aula Laboral Project for persons with disability from the Capacis Foundation. The main aim is to meet a large social demand with a very specific profile within intellectual disability, borderline intelligence, for which there are barely any resources. The pupils are offered quality training and job guidance, based on an education in values and permanent training to develop their professional skills. Many young people with borderline intelligence have found their first job thanks to this programme.
- #coachExit Programme: This corporate volunteer initiative aims to make young people at risk of exclusion more employable through Coaching and Mentoring. The Exit Foundation trains corporate volunteers so that they can "coach" those young people. Volunteers are thus trained in a technique that they can apply in their everyday work and get to know young people, from whom they can also learn a lot, forcing them to activate new skills in the areas of communication, treating diversity, leadership, etc. Over 6 sessions, they "move" their assigned young people through the company, introducing them to colleagues and encouraging teamwork, so that their "trainee" gets to know the world of the company from the inside, discovering their vocation and finding incentive to continue with their training. In all, 9 volunteers from the Ebro offices in Madrid and Seville have participated in this programme.



#### Job promotion and entrepreneurship initiatives

#### San Juan de Aznalfarache (Seville)

In collaboration with the Santa María la Real Foundation and the San Juan de Aznalfarache Town Council, the Ebro Foundation has promoted an Employment Launcher in San Juan. This is a job guidance programme that will help some twenty unemployed people in the town to make a new job search, following an innovative, collaborative, proactive methodology, with new techniques and tools adapted to the new labour situation and the needs of the new job market.

#### Silla (Valencia)

Silla Town Council (Valencia): Workshops on social and labour market inclusion aimed at teenagers at school aged 14-18 and young unemployed people up to age 25. The programme seeks to provide individual assistance, based on their characteristics as a group, although also paying attention to the personal situation of each person. Priority is given at all times to training them as specialist workers, establishing adequate roadmaps for insertion in each case, ending in the achievement of a goal. Three specialities: mechanics, IT and school vegetable patches.

#### Larache - Morocco

• In collaboration with Mundiriz (a subsidiary of the Ebro Group in Morocco), the Codespa Foundation and Entraide Nationale, we have started up a vocational training programme in dressmaking for women in the villages of Adala and Boucharane (Larache, Morocco), rural communities next to the Mundiriz factory. The project aims to help these women to achieve socioeconomic integration by learning a trade. One of the innovative aspects of this programme is that the subject matter corresponds to the interests of the 24 women participating in it, since it was they who explicitly asked to receive training in this area.

#### The project covers:

- 1. Training in dressmaking as their principal activity.
- 2. Training in life skills (behavioural) and literacy, enhancing the knowledge, skills and self-esteem of the women as essential for making decisions and building up their autonomy, raising their awareness and getting them involved in personal choices.
- 3. Training and mentoring and/or self-employment as an alternative way of making a living. Equal rights and responsibilities for all members of the community through training and access to employment.

#### 3. WELFARE ACTION IN GEOGRAPHICAL AREAS OF INTEREST

Contributing towards the socio-economic development of the communities in which the Group operates is another important goal within Ebro's commitment to society. Therefore, the Foundation endeavours especially to support projects that are designed to improve the quality of life and equal opportunities of groups at risk of social exclusion who live around its plants.





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This welfare action is implemented mainly through the financing of projects organised by local entities, which have a first-hand knowledge of the needs of each area and use all their resources to start up those initiatives.

During 2018, the Foundation allocated €90,893.72 to collaborating with different entities in Seville, Madrid, Jerez, India, Morocco and Egypt.

Some of these actions were:

#### Seville

- Mehuer Foundation: collaboration in the IX Congress on Orphan Drugs and Rare Diseases.
- Santa Maria Magdalena Association in Villamanrique de la Condesa, financial contribution for the Epiphany Procession.
- Economic donation to the Spanish Cancer Association for the Epiphany Procession in Seville.
- Ocllaboration with the El Gancho Foundation in the project "La Azotea Azul" ["The Blue Roof"] at Hospital Virgen del Rocío. "La Azotea Azul" is a leisure-therapeutical space on the roof of the second floor of the children's hospital. This new open-air recreational area can be used by all the children (over 4,000 from all over Andalusia) who are admitted to this hospital every year.
- Cáritas Parroquial in San Jose de la Rinconada, economic aid to meet the cost of food, rent, medicines, electricity, water, etc. of the most deprived people in the town. Workshops have also been run to provide support in education, values, self-esteem and employment. 105 families benefited from this action (around 400 people).
- Stop Sanfilippo Foundation: sponsorship of the charity run, "I'm running for Borja", held in La Puebla del Río to raise funds for research of the San Filippo syndrome.
- Asperger's Association in Seville: economic support for the infrastructure of a sheltered apartment to boost the emancipation of young people and adults aged between 18 and 40 with Asperger's syndrome. The aim is to help them learn, so they will be prepared for definitive independence in the future.
- Proyecto Hombre in Seville: funding of four grants for drug addiction treatment of destitute youth.
- ▶ Mater et Magistra Association: financial contribution towards maintenance work at the day centre, more specifically, painting. Beneficiaries: 150.
- Assistance to the Alzheimer's Association in San Juan de Aznalfarache for its programmes for the prevention, awareness and assistance of persons with dementia.
- SEHOP Foundation: collaboration in the VI Solidarity Race for child cancer.
- Ocliaboration with the Adecco Foundation for celebration of International Day of People with Disabilities.

#### **Madrid**

- Vianorte Laguna Foundation, monetary donation for the Christmas concert for the benefit of the Paediatric Day Unit for children with rare and advanced diseases.
- ▶ Participation in the Solidarity Race organised by the También Foundation for the inclusion and accessibility of people with disabilities.



#### Valencia

Association of Families of Alzheimer's patients of Benifaió: economic assistance for the Project for Intervention in People with Alzheimer's at Advanced Stages, which aims to provide an environment suited to the needs of people with an advanced stage of dementia and stimulate areas in which they are still responsive.

#### Jerez de la Frontera

- "Child's Play Project" promoted by San Pablo Parish. The beneficiaries are children aged 6-14. They are offered education in values, with monitors as a complementary or alternative reference for what they have around them. Training is also provided for young people over 14 to act as assistant monitors, pre-monitors and monitors.
- IV Solidarity Dinner started up by the Prodean Foundation to raise funds for the Forfait Mama programme, a welfare project for pregnant women and their children to receive quality assistance at the Monkole Hospital in the Congo during their pregnancy and childbirth.

#### Morocco

• Financing of school transport for children from the kabilas next to our factory, who have no means for getting to school. Funds were also provided to buy school material for one of the nurseries near the plant.

#### **Egypt**

Different projects in the hamlets near our plant: food bags for widows during Ramadan, donations of rice, food for destitute families, etc.

#### India

▶ Financing of the building of a rooms in the new orphanage for 160 girls being built near our plant. We have been collaborating in its construction for three years.

#### Other social contributions

In addition to making economic contributions for the development of welfare programmes, the Ebro Group has surrendered some land for the organisations Madre Coraje and Cáritas for their solidarity initiatives in Jerez de la Frontera.

#### 1. Surrender of land for solidarity vegetable plots developed by the Madre Coraje Association

The Ebro Group has transferred to Asociación Madre Coraje the precarious possession of 7,200 m2 of land in Guadalcacín (Jerez de la Frontera, Cadiz) to set up some solidarity vegetable plots. The Association has divided that land into plots of 50 m2 each and made them available to any volunteer from the Association wishing to work them, whether retired, unemployed or workers. Madre Coraje promotes good practices of traditional, ecological agriculture on that land, based on criteria of environmental sustainability and acquiring a better knowledge of natural processes and healthier food.

Those working each of these plots hand over to Asociación Madre Coraje at least 70% of their production for donation to soup kitchens, and can use the remaining 30% for their private consumption, without seeking a profit.

In the past year, Asociación Madre Coraje has donated over 26,000 kg of horticultural products obtained through these vegetable plots to different welfare entities in the province of Cadiz.

#### 2. Surrender of land to Cáritas to open the Agro-ecological Centre La Jara

The Ebro Group has transferred some 9,300 m2 of land to the entity Cáritas Diocesana de Asidonia-Jerez through an assignment agreement with Madre Coraje. On that land, they have created the first agro-ecological centre in the province, organising numerous production, training and leisure activities in agro-ecology and supporting self-employment initiatives in the sector. This Centre also manages a seed bank.

2018 EBRO FOODS

CSR REPORT, COMMITMENT TO SOCIETY



#### 4. SUSTAINABLE AGRICULTURE

The Foundation also plays an important role in the sustainable agriculture strategy put into practice by the Ebro Group. Both the Group and the Foundation develop and promote programmes, independently or together with other stakeholders, for implementing crop standards that are sustainable from a social and environmental point of view in our principal raw material sourcing regions.

The most important programmes during 2018 were:

**Oryzonte (Spain):** developed in the Guadalquivir Marshes (Seville) jointly with Mars Food and Danone. The project works on three key areas: water, good agricultural practices, emissions and biodiversity, with the aim of building up Andalusia's potential to become a leader in sustainable rice growing.

**EKTA** (India): an agricultural training programme that stresses the need for adequate use of pesticides, one of the main problems for food safety in the country. During 2018 the programme was extended to a further 100 rural hamlets (50 in 2017), bringing on board around 2,500 new growers.

**SAIRISI (Italy):** developed in collaboration with several members of SAI-P (Unilever, Kellogg, Migros), this programme aims to assess growers in accordance with the SAI-P standard, providing specific training given by Enterisi and professionals from the sector (Universities, NGOs, etc.) to improve their performance.

**Ebro Delta (Spain):** through a consortium formed by Kellogg, Ebro Foods and the Food Technology and Research Institute (IRTA), biodiversity management has been studied with a view to benefiting the rice crop and its sustainability in the Ebro Delta.

Sustainable Hom Mali Rice programme (Thailand): Herba Bangkok S.L (Ebro Foods S.A.), Mars Food, Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH and the Thai Rice Department have jointly set up an innovative programme to enhance the economic viability of 1,200 Thai rice growers and develop high quality Hom Mali rice (jasmine rice), sustainable using a Climate-Smart system that mitigates climate chain in the province of Roi Et.

**Control Farming (India):** consisting of educating growers in the correct use of pesticides / fungicides in terms of quantity, quality and timing, with full follow-up to ensure the correct growing practices.

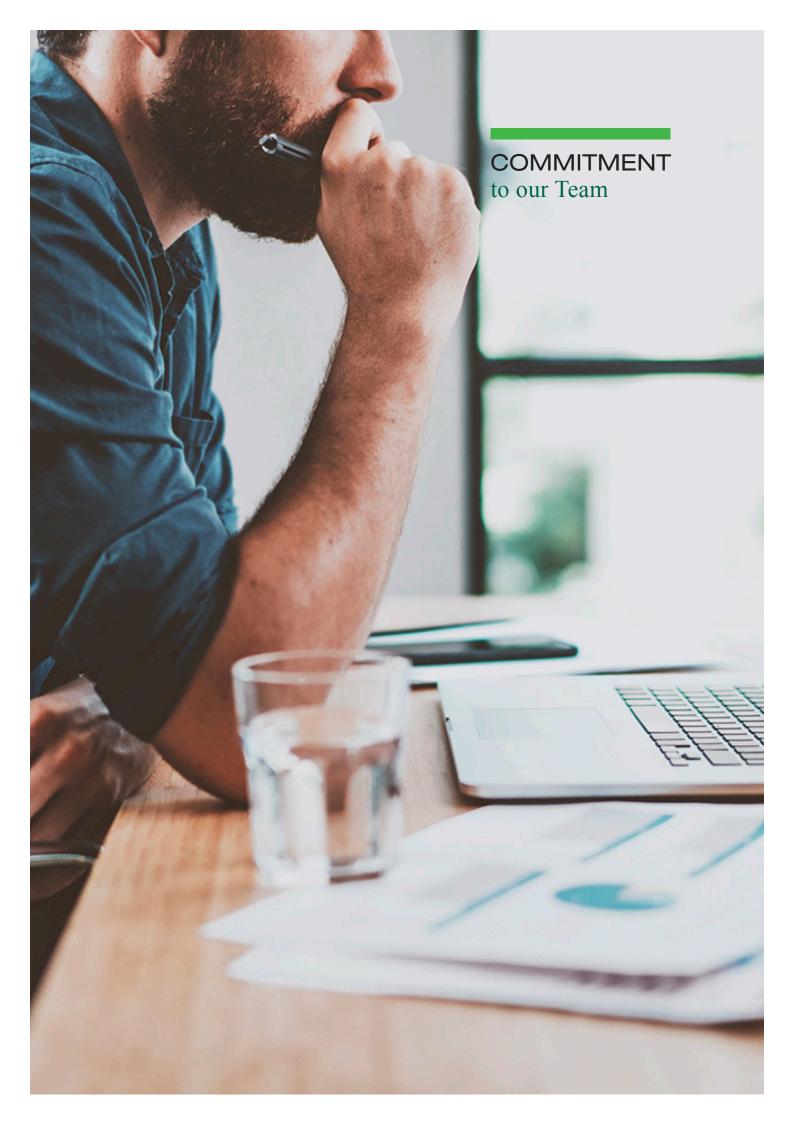
**Organic farming (India):** organic farming programme developed with 1,300 growers to convert from traditional rice crops to organic rice crops.

#### NE

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<sup>\*</sup> Further information on our sustainable agriculture projects can be found in the chapter "Management of the supply chain".

<sup>\*</sup> All the information on the projects developed by the Foundation in 2018 is published on the website www.fundacionebrofoods.es





#### EBRO FOODS, S.A.

#### Commitment to our Team

One of the main sources of value generation in the Ebro Group is our workforce of 7,189 professionals (6,041 direct employees of the company and 1,148 contracted through external agencies), a very close-knit team of professionals with enormous talent potential aligned with the organisation's strategy. Through the human resources departments of the different subsidiaries, the Ebro Group endeavours to motivate these professionals by offering a high quality job while at the same time strengthening their skills, powers and personal and professional leadership.

The Ebro Group's personnel management policy is designed to secure a high level of knowledge and contact with the workforce through a decentralised structure formed by the human resources managers in all the major companies of the Group and the implementation of bespoke policies in each one (in addition to the provisions of labour laws), taking account of the specific features of the countries in which they operate. These policies include not only general guidelines regulating the company/employee relationship, but also specific guidelines on Health & Safety in the Workplace, Training & Education, Diversity and Equal Opportunities and Equal Pay for Men and Women. Companies with a small personnel structure (essentially commercial companies with fewer than 10 employees) are governed exclusively by the labour laws in place in the countries in which they operate.

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

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

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























#### DEVELOPMENT

- Training
- Mobility
- Promotion
- Performance management

#### WORK ENVIRONMENT

- Work-life balance
- Internal communications

#### system

- Fixed remuneration - Variable remuneration
- Flexible remuneration
- Mobility bonus

#### BENEFITS

- Study grants for employees' children
- Pension schemes
- Life assurance
- Medical insurance Advances against pay
- Payment in kind
- Medical grants

#### DIVERSITY

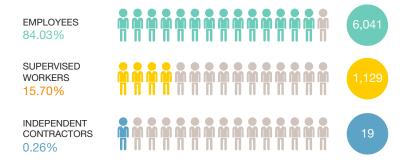
- Gender equality plans - Programmes for the integration of people with different capacities

At present, the Ebro Group has no specific policies on disconnection from work.

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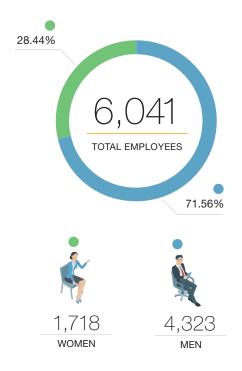


#### SNAPSHOT OF OUR WORKFORCE IN 2018



7,189

#### **EMPLOYEES BREAKDOWN**



Age	
<=30	17.99%
30 - 50	52.56%
>=50	29.45%
Average Seniority	
	9.74
Permanent Contracts	
1543	89.81%
Executives & Middle M	anagement
343	19.97%
Net Employment	Employee
Creation	
	Turnove
Creation	Turnove
Creation 172	Turnove 10.01%
Creation 172	Turnove 10.01%
Of New Hires	Turnove 10.01% 34.47% 57.22%
Creation  172  Of New Hires  Total Training	Turnove 10.01% 34.47%

WOMEN

MEN	
Age	
<=30	14.90%
30 - 50	52.95%
>=50	32.15%
Average Seniority	
	10.53
Permanent Contracts	
3939	91.12%
Net Employment	15.45% Employee
Creation	Turnovei
271	6.27%
Of New Hires	
	65.53%
Total Training	
2820	65.23%
Disabled workers	
78	1.80%



# **EMPLOYMENT**

### TOTAL NUMBER AND BREAKDOWN OF EMPLOYEES BY GENDER

	2	018	2017		
TOTAL EMPLOYEES	TOTAL	% TOTAL EMPLOYEES GROUP	TOTAL	% TOTAL EMPLOYEES GROUP	
Men	4,323	71.56%	3,849	70.49%	
Women	1,718	28.44%	1,611	29.51%	
TOTAL EMPLOYEES	6,041		5,460		

**NB**: The large gap between men and women is largely due to the nature of the Group, which is predominantly factory-based. On the whole, factory work has traditionally been done mainly by men. In this context, over 70% of the personnel employed at the production plants of the Ebro Group are men. The men employed in factories represent 51% of the total male headcount in the Group. The gender balance in office jobs is much more even and in certain categories there are more women than men, such as in administration, where the number of women practically doubles that of men. Gender diversity is one of the commitments established in the Group's human resources guidelines.

### BREAKDOWN OF EMPLOYEES BY BUSINESS AREA AND GENDER

	2018				2017			
	TO	TAL	% TOTAL BUS	SINESS AREA	то	TAL	% TOTAL BUSINESS AREA	
AREA	MEN	WOMEN	% MEN	% WOMEN	MEN	WOMEN	% MEN	% WOMEN
Rice	2,452	782	75.82%	24.18%	1,985	651	75.30%	24.70%
Pasta	1,637	807	66.98%	33.02%	1,698	861	66.35%	33.65%
Holding	36	24	60.00%	40.00%	39	23	62.90%	37.10%
Organic	163	89	64.68%	35.32%	94	59	61.44%	38.56%
Others	35	16	68.63%	31.37%	33	17	66.00%	34.00%
TOTAL	4,323	1,718	71.56%	28.44%	3,849	1,611	70.49%	29.51%

## BREAKDOWN OF EMPLOYEES BY AGE GROUP

	2	018	2	2017
AGE GROUP	TOTAL	% TOTAL EMPLOYEES GROUP	TOTAL	% TOTAL EMPLOYEES GROUP
<=30	953	15.78%	815	14.93%
30 - 50	3,192	52.84%	2,931	53.68%
>= 50	1,896	31.39%	1,714	31.39%
TOTAL EMPLOYEES	6,041		5,460	



# TOTAL HEADCOUNT BY AGE GROUP AND GENDER

2018 2017

AGE GROUP	TOTAL MEN	% MEN OF TOTAL	TOTAL WOMEN	% WOMEN OF TOTAL	TOTAL MEN	% MEN OF TOTAL	TOTAL WOMEN	% WOMEN OF TOTAL
<= 30	644	14.90%	309	17.99%	547	14.21%	268	16.64%
30 - 50	2,289	52.95%	903	52.56%	2,070	53.78%	861	53.45%
>= 50	1,390	32.15%	506	29.45%	1,232	32.01%	482	29.92%
TOTAL	4,323		1,718		3,849		1,611	

# BREAKDOWN OF EMPLOYEES BY COUNTRY

2018 2017

COUNTRY	TOTAL EMPLOYEES	%TOTAL EMPLOYEES COUNTRY	TOTAL EMPLOYEES	%TOTAL EMPLOYEES COUNTRY
Belgium	96	1.59%	93	1.70%
Cambodia	6	0.10%	0	0.00%
Canada	368	6.09%	359	6.58%
Denmark	47	0.78%	0	0.00%
Egypt	53	0.88%	53	0.97%
France	1,647	27.26%	1,651	30.24%
Germany	88	1.46%	84	1.54%
Hungary	5	0.08%	6	0.11%
India	58	2.04%	104	1.90%
Italy	266	9.60%	205	3.75%
Morocco	127	4.40%	291	5.33%
Netherlands	580	2.10%	115	2.11%
Portugal	266	1.11%	64	1.17%
Romania	67	0.15%	10	0.18%
Spain	9	16.19%	943	17.27%
Thailand	188	3.11%	128	2.34%
United Kingdom	119	1.97%	101	1.85%
USA	1,274	21.09%	1,253	22.95%
AVERAGE WORKFORCE	6,041		5,460	







# BREAKDOWN OF EMPLOYEES BY PROFESSIONAL CATEGORY

2018 2017

PROFESSIONAL CATEGORY	NO. EMPLOYEES	% TOTAL EMPLOYEES GROUP	NO. EMPLOYEES	% TOTAL EMPLOYEES GROUP
Executives	168	2.78%	141	2.58%
Middle management	843	13.95%	792	14.51%
Administrative staff	737	12.20%	680	12.45%
Auxiliary staff	1.256	20.79%	1,214	22.23%
Sales representatives	263	4.35%	253	4.63%
Others	2.774	45.92%	2,380	43.59%
TOTAL EMPLOYEES	6.041		5,460	

#### BREAKDOWN OF EMPLOYEES BY PROFESSIONAL CATEGORY AND GENDER

2018

PROFESSIONAL CATEGORY	NO. MEN	% MEN/TOTAL CATEGORY	NO. WOMEN	% WOMEN/TOTAL CATEGORY
Executives	125	74.40%	43	25.60%
Middle management	543	64.41%	300	35.59%
Administrative staff	284	38.53%	453	61.47%
Auxiliary staff	963	76.67%	293	23.33%
Sales representatives	180	68.44%	83	31.56%
Others	2,228	80.32%	546	19.68%
TOTAL	4,323	71.56%	1,718	28.44%

### BREAKDOWN OF EMPLOYEES BY PROFESSIONAL CATEGORY AND AGE GROUP

2018

	NO. EMPLOYEES BY AGE GROUP			% S/TOTAL CATEGORY		
PROFESSIONAL CATEGORY	<30	30 - 50	>50	<30	30 - 50	>50
Executives	3	101	64	1.79%	60.12%	38.10%
Middle management	86	483	274	10.20%	57.30%	32.50%
Administrative staff	122	394	221	16.55%	53.46%	29.99%
Auxiliary staff	193	559	504	15.37%	44.51%	40.13%
Sales representatives	43	133	87	16.35%	50.57%	33.08%
Others	506	1,521	747	18.24%	54.83%	26.93%
TOTAL	953	3,191	1,897	15.78%	52.82%	31.40%





## BREAKDOWN OF EMPLOYEES BY AGE GROUP AND GENDER

2018

DDOFFCOONAL CATECODY	MEN			WOMEN		
PROFESSIONAL CATEGORY	<30	30 - 50	>50	<30	30 - 50	>50
Executives	2	67	56	1	34	8
Middle management	36	296	211	50	187	63
Administrative staff	50	152	82	72	242	139
Auxiliary staff	149	438	376	44	121	128
Sales representatives	25	89	66	18	44	21
Others	382	1,247	599	124	274	148
TOTAL	644	2,289	1,390	309	902	507

### BREAKDOWN OF EMPLOYEES BY TYPE OF CONTRACT

2018 2017

TYPE OF CONTRACT	TOTAL	% TOTAL EMPLOYEES GROUP	TOTAL	% TOTAL EMPLOYEES GROUP
No. indefinite or permanent	3,840	63.57%	3,339	61.15%
No. fixed term or temporary	559	9.25%	509	9.32%
At-Will*	1,642	27.18%	1,612	29.52%
TOTAL EMPLEADOS	6,041		5,460	

## BREAKDOWN TYPE OF EMPLOYMENT CONTRACT BY CONTINENT

			2018		2017
CONTINENT	TYPE OF CONTRACT	TOTAL	% TOTAL EMPLOYEES CONTINENT	TOTAL	% TOTAL EMPLOYEES CONTINENT
	No. indefinite or permanent	110	34.48%	141	40.99%
Africa	No. fixed term or temporary	209	65.52%	203	59.01%
	At-Will	0	0.00%	0	0.00%
TOTAL AFRICA		319	5.28%	344	6.30%
	No. indefinite or permanent	317	100.00%	232	100.00%
Asia	No. fixed term or temporary	0	0.00%	0	0.00%
	At-Will	0	0.00%	0	0.00%
TOTAL ASIA		317	5.25%	232	4.25%
	No. indefinite or permanent	3,413	90.70%	2,966	90.65%
Europe	No. fixed term or temporary	350	9.30%	306	9.35%
	At-Will	0	0.00%	0	0.00%
TOTAL EUROPE		3,763	62.29%	3,272	59.93%
	No. indefinite or permanent	0	0.00%	0	0.00%
North America	No. fixed term or temporary	0	0.00%	0	0.00%
	At-Will	1,642	100.00%	1,612	100.00%
TOTAL NORTH AMERICA		1,642	27.18%	1,612	29.52%
TOTAL EMPLOYEES		6,041		5,460	

<sup>(\*)</sup> The At-Will modality corresponds in the USA to the indefinite contract in Europe.



# BREAKDOWN OF EMPLOYEES BY TYPE OF CONTRACT, WORKING DAY AND GENDER

2018

					710		
		М	EN	WOI	MEN	то	TAL
CONTINENT	TYPE OF CONTRACT	FULL-TIME	PART-TIME	FULL-TIME	PART-TIME	FULL-TIME	PART-TIME
	No. indefinite or permanent	105	0	5	0	110	0
Africa	No. fixed term or temporary	174	0	35	0	209	0
	At-Will	0	0	0	0	0	0
	No. indefinite or permanent	229	0	88	0	317	0
Asia	No. fixed term or temporary	0	0	0	0	0	0
At-Will	At-Will	0	0	0	0	0	0
	No. indefinite or permanent	2,390	63	867	93	3,257	156
Europe	No. fixed term or temporary	208	2	133	7	341	9
	At-Will	0	0	0	0	0	0
	No. indefinite or permanent	0	0	0	0	0	0
North America	No. fixed term or temporary	0	0	0	0	0	0
7 111101100	At-Will	1,143	15	475	9	1,618	24
TOTAL		4,249	80	1,603	109	5,852	189

2018 2017

FORM OF CONTRACT	TOTAL	% TOTAL EMPLOYEES	TOTAL	% TOTAL EMPLOYEES
Written contracts	4,159	68.85%	3,575	65.48%
Oral contracts	240	3.97%	273	5.00%
At-will contracts	1,642	27.18%	1,612	29.52%
TOTAL EMPLOYEES	6,041		5,460	

## BREAKDOWN OF PERMANENT EMPLOYEES BY GENDER AND AGE GROUP

2018

		MEN		WOMEN			TOTAL		
	< 30	>30 & <50	> 50	< 30	>30 & <50	> 50	< 30	>30 & <50	> 50
No. indefinite or permanent	344	1,593	844	165	604	290	509	2,197	1,134
At-Will	138	508	512	45	233	206	183	741	718
TOTAL EMPLEADOS INDEFINIDOS	482	2,101	1,356	210	837	496	692	2,938	1,852





## BREAKDOWN OF TEMPORARY EMPLOYEES BY GENDER AND AGE GROUP

2018

	MEN			WOMEN			TOTAL		
	< 30	>30 & <50	> 50	< 30	>30 & <50	> 50	< 30	>30 & <50	> 50
Fixed term or temporary	162	188	34	99	65	11	261	253	45

## BREAKDOWN OF PART-TIME EMPLOYEES BY GENDER

#### PART-TIME EMPLOYEES

	MEN	WOMEN	TOTAL
TOTAL EMPLOYEES	80	109	189

# EMPLOYEE TURNOVER AND NET CREATION OF EMPLOYMENT

2018 2017

	20	710	2017		
TYPE OF TURNOVER	MEN	WOMEN	MEN	WOMEN	
No. new hires	863	454	631	394	
No. employees resigned	355	197	326	182	
No. employees dismissed	169	51	134	58	
No. employees retired	57	20	37	21	
No. employees permanent disability	15	3	10	1	
No. employees deceased	11	14	8	4	

## **TURNOVER RATE**

2018 2017

MEN	WOMEN	MEN	WOMEN	
6.27%	10.01%	3.27%	8.01%	

## **TOTAL TURNOVER RATE**

2018	2017		
7.33%	4.67%		

## **EMPLOYMENT NET CREATION**

2018	2017
443	255





# NUMBER OF DISMISSALS BY GENDER, AGE AND PROFESSIONAL CATEGORY

CATEGORY	MEN				TOTAL		
	< 30	>30 & <50	> 50	< 30	>30 & <50	> 50	
Executives		1	1				2
Middle management	1	3	7	2	3	3	19
Administrative staff	1	4	1	1	6	2	15
Auxiliary staff	43	52	27	10	16	4	152
Sales representatives		3			1	2	6
Others	10	7	8		1		26
TOTAL	55	70	44	13	27	11	220

## EMPLOYEES PROMOTED DURING THE YEAR, BY GENDER

#### NO. INTERNAL PROMOTIONS

#### % OF GENDER EMPLOYEES

NO. MEN	NO. WOMEN	NO. MEN	NO. WOMEN	
160	68	3.70%	3.96%	

# AVERAGE LENGTH OF SERVICE OF EMPLOYEES, BY CATEGORY AND GENDER

	2018			2017		
CATEGORY	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Executives	11.26	6.99	10,17	10.92	9.85	10.72
Middle management	11.67	8.45	10,52	13.97	8.40	12.09
Administrative staff	11.50	10.95	11,16	11.69	11.13	11.34
Auxiliary staff	9.82	10.18	9,90	11.11	10.27	10.87
Sales representatives	9.18	7.81	8,74	9.80	7.84	9.13
Others	10.50	9.72	10,35	11.39	10.86	11.29
TOTAL	10.53	9.74	10,30	11.62	10.21	11.20







## ORGANISATION OF WORK

#### ORGANISATION OF WORKING TIME

Organisation of the working time varies in the different countries in which the Group's subsidiaries 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 47 (offices) and 52 (some production plants).

#### **ABSENTEEISM**

The total number of days of absenteeism in all the Group companies was 49,118 days.

#### **BENEFITS FOR EMPLOYEES**

The following table shows, by company, the benefits provided for employees in six of the subsidiaries with the greatest weight in the Group (these six companies jointly account for almost 70% of the Group turnover and over 81% of its EBITDA):

	COMPANY					
BENEFITS	HERBA RICEMILLS	RIVIANA	PANZANI	LUSTUCRU	BERTAGNI	GAROFALO
Stock ownership	All employees	-	-	-	-	-
Parental leave	All employees	Full-time employees	All employees	All employees	All employees	All employees
Disability/invalidity benefit	All employees	Full-time employees	All employees	All employees	_	All employees
Pension fund	-	All employees	All employees	All employees	-	All employees
Life assurance	All employees	Full-time employees	All employees	All employees	-	All employees
Medical insurance	All employees	Full-time employees	All employees	All employees	All employees	All employees

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

The Group is working on the measures that would help enhance the work-life balance of its employees, such as teleworking.

We comply with the prevailing laws on parental leave and gestation periods and facilitate the application of those laws according to employees' needs.



	2018			2017		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Employees who were entitled to parental leave	102	67	169	77	50	127
Employees who took parental leave	98	67	165	74	50	124
Employees who returned to work after parental leave ended	97	53	150	74	39	113
Employees who returned to work after parental leave ended and were still employed twelve months later	88	55	143	60	44	104
		2018			2017	
	% MEN	% WOMEN	%TOTAL	% MEN	% WOMEN	%TOTAL
% Employees who exercised their right	96.08%	100.00%	97.63%	96.10%	100.00%	97.64%
Return to work rate	98.98%	79.10%	90.91%	100.00%	78.00%	91.13%
Retention rate	90.72%	103.77%	95.33%	81.08%	112.82%	92.04%

**NB**: The retention rate is calculated using the formula indicated in the GRI: Total number of employees retained 12 months after returning to work following a period of parental leave / Total number of employees returning from parental leave in the reporting period

## **HEALTH AND SAFETY**

All the Group companies and their respective plants have an occupational hazard prevention and management system in place. This system is implemented using both internal means and external firms. In addition, approximately 90% of the workforce is represented on the Health and Safety Committees in the different companies.

## INVESTMENT, HOURS' TRAINING AND COST OF TRAINING IN OCCUPATIONAL HAZARD PREVENTION

	2018	2017
Investment	3,026,525.98 €	2,361,540.17 €
Hours' training	27,001	30,560
Cost of training	686,508.47 €	488,032.52 €

The investments made during the year in this area were mainly to bring our workplaces and equipment in line with the standards required in Spanish legislation, safety audits, improvements in personal protection equipment for employees, regular inspections of safety equipment, first aid training and material, fire protection systems, etc.



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

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

- Global agreements: in accordance with the principles established by the ILO, organisational structures for problem-solving, commitments regarding target performance or the level of practice to apply.
- Local agreements: personal protection equipment, mixed health and safety committees, participation of workers' representatives in health and safety audits, inspections and investigations, training and education and right to refuse unsafe work.

# NUMBER, FREQUENCY AND SEVERITY OF INJURIES, NUMBER OF EMPLOYEES WITH OCCUPATIONAL DISEASES AND NUMBER OF WORK-RELATED FATALITIES

The following tables show the information corresponding to the companies with the greatest weight in the business: Herba Ricemills, Lustucru, Panzani, Riviana Foods, Pastificio Lucio Garofalo and Bertagni.

#### NUMBER OF INJURIES

#### 2018

	MEN	WOMEN
No. lost time injuries	98	22

#### FREQUENCY RATE

#### 2018

	MEN	WOMEN
Severity rate	20	12

#### SEVERITY RATE

#### 2018

	MEN	WOMEN
Severity rate	0.53	0.51

There was one work-related fatality in 2018 in one of the Group's subsidiaries.

NB: The rates were calculated with the following formulas:

Frequency rate = (total no. lost time injuries / total hours worked) x1000000

Severity rate = (no. lost days due to lost time injury in working hours / total hours worked) x1000

## OCCUPATIONAL DISEASE

## 2018

	MEN	WOMEN
No. employees with occupational disease	3	1



## LABOUR RELATIONS

#### EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS

65% of the employees of the Ebro Group are covered by the collective bargaining agreements of their respective business areas or another kind of collective agreement.

The remaining 35% are top executives of the Ebro Group, the professionals of the North American companies (since these agreements have not been used there for over 20 years) and those of Herba Egypt, Mundiriz, Herba Bangkok and Herba Ingredients, where they are not used either. In those cases, all the professionals are protected by the national labour laws in place in their respective countries, their respective personnel policies and the guidelines of the Ebro Group's Code of Conduct. External ethical audits are conducted regularly in all of them.

### **TRAINING**

In its Code of Conduct, the Ebro Group undertakes to promote the personal and professional development of its workers, encouraging them to improve their skills and abilities. In this context, 63% of the Group's employees participated in the training schemes organised in the different Group companies during 2018, completing a total of 72,759 hours training.

	2018	2017
Total cost of training	2,093,367 €	1,818,164 €
Total hours of training	72,759	130,220
No. employees who have received training	3,803	3,699
% OF TOTAL EMPLOYEES	62.95%	67.75%

## **TOTAL HOURS TRAINING**

	2018			
CATEGORY	MEN	WOMEN		
Executives	1,029	826		
Middle management	8,571	3,996		
Administrative staff	4,430	6,915		
Auxiliary staff	19,376	6,698		
Sales representatives	1,219	593		
Others	16,778	2,328		
TOTAL	51,403	21,356		



2018 2017

CATEGORY	MEN	WOMEN	MEN	WOMEN
Executives	8.23	19.21	12.89	15.33
Middle management	15.78	13.32	21.67	16.01
Administrative staff	15.60	15.27	19.23	16.43
Auxiliary staff	20.12	22.86	60.62	67.97
Sales representatives	6.77	7.14	15.41	9.25
Others	7.53	4.26	9.72	5.63
TOTAL	11.89	12.43	23.77	24.04

NB. The principal subject areas on which training has been given are: languages, food safety and quality, health and safety at work, occupational hazard prevention, information technologies, development of commercial and marketing skills, environment, corrective and preventive maintenance, gender equality, handling of food, data protection, etc

## **EQUALITY**

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

In addition and even though some of the companies in the Group have their own equality plans or guidelines, one of the goals of the Sustainability Plan "Heading for 2030" is to draft the Corporate Equality Plan during 2019.

## **DIVERSITY IN GOVERNING BODIES AND EMPLOYEES**

2018			2017		
TOTAL EMPLOYEES	TOTAL	% TOTAL EMPLOYEES GROUP	TOTAL	% TOTAL EMPLOYEES GROUP	
Men	4,323	71.56%	3,849	70.49%	
Women	1,718	28.44%	1,611	29.51%	
TOTAL EMPOYEES	6.041		5.460		

2	01	2

	NO. MEN	NO. WOMEN	MEN / TOTAL %	WOMEN / TOTAL %
Board of Directors	8	5	61.54%	38.46%



#### EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS

	EMPLOYEES REVIEWED / TOTAL EMPLOYEES BY GENDER (%)		% EMPLOYEES WITH VARIABLE REMUNERATION ASSOCIATED WITH REVIEW	
	% MEN	% WOMEN	% MEN	% WOMEN
2017	38.63%	51.09%	66.31%	70.84%
2018	38.14%	51.92%	64.22%	73.99%

#### 2018

NO. EMPLOYE	EES REVIEWED	NO. EMPLOYEE NO. EMPLOY REVIEW IS ASS VARIABLE RE	EES WHOSE		S REVIEWED PLOYEES BY ER (%)	REMUNERATIO	WITH VARIABLE N ASSOCIATED REVIEW
NO. MEN	NO. WOMEN	NO. MEN	NO. WOMEN	NO. MEN	NO. WOMEN	NO. MEN	NO. WOMEN
1,649	892	1,059	660	38.14%	51.92%	64.22%	73.99%

28.5% of the employees of the different companies in the Ebro Group are included in a variable remuneration scheme which links the variable part of their annual salary to a number of collective (of the Ebro Group overall and the different business units) and job-specific objectives.

In addition, several employees of the Ebro Group in Spain benefit from the payment-in-kind programme, whereby taxation of their salaries can be optimised through the receipt of certain benefits, such as medical insurance, company car, computers or nursery service.

This remuneration policy includes the Ebro Foods, S.A. share delivery scheme, which is established for all employees of the Ebro Group with tax residence in Spain, both the parent and its Spanish subsidiaries. Participation in the scheme is voluntary and charged against employees' variable remuneration, or fixed remuneration, as the case may be. Under current tax laws, any employees who so wish may receive up to 12,000 euros in Ebro Foods, S.A. shares without considering them remuneration for the purpose of personal income tax. During 2018, 65 employees of different Ebro Group received shares in Ebro Foods, S.A. for an overall sum of €592,856.

Ratio of the entry level wage paid by the Group to its employees compared to the local minimum wage stipulated by law (broken down by significant business units and business units in developing countries)

SIGNIFICANT BUSINESS UNITS	RATIO
Bertagni	1.07
Garofalo	1.07
Herba Ricemills	1.69
Lustucru	1.01
Panzani	1.09
Riviana	1.96

BUSINESS UNITS IN DEVELOPING COUNTRIES	RATIO
Herba Egypt	1.00
Ebro India	1.13
Mundi Riz	1.00









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## Percentage of senior management hired from the local community

(broken down by significant business units and business units in developing countries)

SIGNIFICANT BUSINESS UNITS	NATIONAL EXECUTIVES
Bertagni	100%
Garofalo	100%
Herba Ricemills	90%
Lustucru	100%
Panzani	100%
Riviana	56%

BUSINESS UNITS IN DEVELOPING COUNTRIES	NATIONAL EXECUTIVES
Herba Egypt	50%
Ebro India	82%
Mundi Riz	100%

#### **EMPLOYEES WITH DIFFERENT ABILITIES**

2017 2018

MEN	WOMEN	MEN	WOMEN
78	33	77	23

The Ebro Group has promoted several actions in Spain related with the socio-occupational integration of persons with different abilities, through the contracting of certain services with special employment centres (CEE).

The value of those collaborations in 2017 was €76,137.18:

ENTITY	CONCEPT	AMOUNT
C.E.E. CADEMADRID	Printing work	1,901.07 €
FUNDACIÓN PRODIS	Sundry printing work	540.87 €
C.E.E. INSERCIÓN PERSONAL DISCAPACITADOS " IPD"	Cleaning head offices in Madrid	73,695.24 €
	TOTAL	76,137.18 €

#### REMUNERATION FOR EQUAL JOBS OR AVERAGE REMUNERATION IN THE COMPANY

Since the company's subsidiaries embrace a wide variety of professional categories and countries, it is impossible to give a consolidated average that accurately reflects the Group's remuneration policy. Therefore, as in other indicators, we offer the details corresponding to six of the principal companies in the Group: Herba Ricemills, Lustucru, Panzani, Riviana Foods, Pastificio Lucio Garofalo and Bertagni.

#### Ratio of the basic salary and average remuneration of women to men

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

## Men-women ratio of average remuneration

The following tables set out the women-men ratios in average remuneration, showing only those employee categories in which there are both genders and, therefore, that ratio can be established.

We calculated this average remuneration based on the average gross annual salary of the employees (men and women) in each category. This gross salary includes the sum of basic salary plus supplements, such as seniority, cash bonuses and equity (e.g. shares) bonuses, overtime and any other welfare benefit (transport, accommodation expenses, aids for children, etc.).

2018 FBRO FOODS



COMPANY	CATEGORY	AVERAGE REMUNERATION MEN	AVERAGE REMUNERATION WOMEN	WOMEN- MEN RATIO
BERTAGNI	Office staff	31,648	29,583	0.93
BERTAGNI	Factory staff	24,727	22,728	0.92
	Contractual Administrative Level 2	43,085	39,752	0.92
CAROFALO	Contractual Administrative Level 3	24,769	27,589	1.11
GAROFALO	Contractual Administrative Level 3A	37,264	31,923	0.86
	Contractual Administrative Level 4	22,845	26,919	1.18
	a) Technical, Administrative and Commercial Staff			
	Level I	42,103	38,796	0.92
	Level II	35,317	30,845	0.87
	Level III	28,813	23,913	0.83
	Level V	18,628	18,628	1.00
	b) Production Staff			
	Level I	35,593	32,405	0.91
HERBA RICEMILLS	Level II	33,410	27,090	0.81
THOEIMIEEO	Level IV	29,158	28,760	0.99
	Level VI	26,679	21,619	0.81
	Level VIII	21,094	21,094	1.00
	c) Maintenance Staff			
	Level III	19,500	19,500	1.00
	d) Management			
	Level II	87,012	73,509	0.84
	Executives	59,541	54,167	0.91
LUCTUODU	Technical staff & supervisors	39,609	39,841	1.01
LUSTUCRU	Office staff	37,959	30,656	0.81
	Factory staff	29,883	26,760	0.90
	Executives	82,865	57,917	0.70
	Technical staff & supervisors	44,542	37,970	0.85
PANZANI	Office staff	36,587	32,716	0.89
	Factory staff	35,393	31,914	0.90
	Executives	436,293	312,971	0.72
	Middle management	110,546	102,221	0.92
	Professionals	74,531	66,781	0.90
RIVIANA	Technical staff	44,871	39,024	0.87
	Administrative staff	42,046	43,913	1.04
	Unskilled workers & assistants	35,966	36,738	1.02
	Factory staff	43,754	43,328	0.99

**NB** The employees of these companies represent 62% of the total Group employees. The formula used to calculate the average was to divide the average remuneration of women by the average remuneration for men.



## Average remuneration of directors by gender

	MEN	WOMEN
Average remuneration (1)	€256 thousand	€197 thousand

(1) The directors' remuneration in 2018 for their duties as such was taken, excluding the remuneration received by the Executive Chairman for his executive duties. The Chairman is the only executive director who performs executive duties and receives remuneration for them. The directors' remuneration for their duties as such is stated individually for each one in the Annual Report on Directors' Remuneration 2018, published on the website of the CNMV (www.cnmv.es) and the corporate website (www.ebrofoods.es). Certain differences may exist due to rounding off.

## Average remuneration of executives by gender

	MEN	WOMEN
Average remuneration (2)	85,503	66,525

(2) This average remuneration was calculated based on the average gross annual salaries of all the executives in the Ebro Group. That gross salary includes the sum of basic salary plus supplements, such as seniority, cash bonuses and equity (e.g. shares) bonuses, and any other welfare benefit (transport, accommodation expenses, aids for children, etc.). The formula used was the sum of average remuneration by gender divided by the number of different categories of executives by gender.



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# EBRO FOODS, S.A.

# Commitment to our Public

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

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

#### **OUR MAIN TOOLS**

#### 1. R&D AND INNOVATION

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

The Ebro Group is a pioneer in the development of new concepts and innovation in the segments in which it operates. This can be seen in the new products put on the market over the past three years, such as Brillante Sabroz, Lustucru Selection, Quick Pasta, Ancient Grains, SOS Para, SOS Vidasania, Brillante a la Sartén, SOS Platos, Squeez Sauces, gluten free, brown/wholewheat rice and pastas, high-fibre and high-calcium products, quinoa, Brillante Benefit, etc.

Approximately one-third of the Ebro Group's total investment budget is set aside each year for innovation.

## 2. QUALITY CONTROL AND FOOD SAFETY SYSTEMS

- i. Good Manufacturing Practices (GMP): contemplating good practices for the handling, packaging, storage and carriage of fresh products.
- ii. Hazard Analysis and Critical Control Point (HACCP): a system for identification and control of any problems that may come to light during the design and production processes.

## iii. Quality Assurance Standards, such as:

- The standards established by the International Organisation for Standardization (ISO 9001:2000, ISO 9001:2008 and ISO 22000).
- ▶ The International Food Standards (IFS), which, structured in line with ISO 9001:2000, are among the highest distinctions in Food Safety in all distribution sectors in Europe.
- ▶ The BRC (British Retail Consortium) certification, one of the internationally most widespread models for distributors and large retail outlets to rate their brand product suppliers.
- ▶ The Danish DS standards (Danish HACCP Code), for developing a HACCP system in the food industry and in the manufacturing of packing and packaging for food products.



In this context, all the Ebro Group plants have been certified for quality and food safety, having a total of 135 certifications between them. The companies also make regular assessments of their products to promote their safety and improvement. During 2018, the subsidiaries Arrozeiras Mundiarroz (Portugal), Catelli Foods (Canada), Geovita (Italy), Lassie (Netherlands), Riviana Foods (USA) and Vegetalia (Spain) made such assessments.

COMPANY	COUNTRY	NAME OF PLANT	CERTIFICATE
ARROZEIRAS MUNDIARROZ	PORTUGAL	CORUCHE	ISO 9001 ISO 22000 FOOD PRODUCT CERTIFICATION IFS
AROTZ	SPAIN	NAVALENO	IFS
		AVIO	BRC IFS
BERTAGNI	ITALY	VICENZA	BIOS - ORGANIC CERTIFICATION BRC IFS
BOOST NUTRITION	BELGIUM	MERKSEM	IFS KOSHER ORGANIC CERTIFICATION
	CANADA	MONTREAL	SQF
CATELLI FOODS CORPORATION		DELTA	BRC
		HAMILTON	BRC
CELNAT	FRANCE	SAINT GERMAIN LAPRADE	ORGANIC CERTIFICATION DEMETER BIODYNAMIC AGRICULTURE
EBRO INDIA	INDIA	TARAORI	ISO 22000 ORGANIC CERTIFICATION BRC IPQC PPQS KOSHER ISO-17025 (LAB.)
EBROFROST DENMARK	DENMARK	ORBAEK	BRC KOSHER ORGANIC CERTIFICATION
EBROFROST UK	UK	BECKLEY	BRC
EBROFROST NORTH AMERICA	USA	MEMPHIS	SQF







COMPANY	COUNTRY	NAME OF PLANT	CERTIFICATE	
			FSSC 22000	
		BRUNO	ORGANIC	
		BRUNU	KOSHER	
			HALAL	
GEOVITA	ITALY	NIZZA NAONIEEDDATO	FSSC 22000	
		NIZZA MONFERRATO	ORGANIC	
			BRC	
		VILLANOVA MONFERRATO	IFS	
			ORGANIC	
			ISO 9001	
			BRC	
			ORGANIC CERTIFICATION	
			HALAL	
HERBA BANGKOK	THAILAND	SARABURI	KOSHER	
TILNDA BANGNON	HIAILAND	SANADONI	GMP & HACCP	
			GLUTEN FREE CERTIFICATION	
			FAIR TRADE & FLOCERT CERTIFICATION	
			FAIR TRADE-ECO SOCIAL STANDARD CERTIFICATION	
	CAMBODIA	PHNOM PENH	ISO 9001	
			ORGANIC CERTIFICATION (EU)	
HERBA CAMBODIA			ORGANIC CERTIFICATION (NOP)	
			GMP & HACCP	
HERBA EGYPT	EGYPT	MANSOURA	ISO 22000	
	BELGIUM	SCHOTEN	ORGANIC CERTIFICATION	
	BELGIUM	001107511	IFS	
	BELGIUM	SCHOTEN	GMP	
			IFS	
	BELGIUM	SCHOTEN	GMP	
			ECOLOGICAL CERTIFICATION	
			IFS	
HERBA INGREDIENTS			GMP	
	NET IES	111001100	KOSHER	
	NETHERLANDS	WORMER	HALAL	
			ORGANIC CERTIFICATION	
			CHINESE ORGANIC	
			IFS	
	NETHERLANDS	WORMER	GMP	
			1	



COMPANY	COUNTRY	NAME OF PLANT	CERTIFICATE	
			IFS	
		OODIA DEL DÍO	ISO 9001	
		CORIA DEL RÍO	ECOLOGICAL CERTIFICATION	
			KOSHER	
			ISO 9001	
			BRC	
		SAN JUAN DE AZNALFARACHE (Ready foods plant and Rice plant)	IFS	
		(ricady roods plant and riles plant)	ECOLOGICAL CERTIFICATION	
			KOSHER (rice)	
			ISO 9001	
		JEREZ DE LA FRONTERA  Ready foods plant and Rice plant)	BRC	
		rioddy ioodd piarit arid riiod piarity	IFS	
			KOSHER	
			GLUTEN FREE CERTIFICATION	
		SILLA	ISO 9001	
			BRC	
	SPAIN		IFS	
HERBA RICEMILLS			ISO 45000	
		ALGEMESÍ	ISO 9001	
		(Ready foods plant and Rice plant)	IFS	
			BRC	
			ISO 45000	
		ALGEMESÍ (Rice plant)	ISO 9001	
		( noo planty	KOSHER	
			ISO 45000	
		ALGEMESÍ (Flour mill)	IFS	
		(Flodi 11111)	KOSHER	
			IFS	
		LA RINCONADA	ECOLOGICAL CERTIFICATION	
			KOSHER	
			IFS	
		100 041 40100	ISO 9001	
		LOS PALACIOS	ECOLOGICAL CERTIFICATION	
			KOSHER	
			ECOLOGICAL CERTIFICATION	
LASSIE	NETHERLANDS	WORMER	IFS	
			GMP	



COMPANY	COUNTRY	NAME OF PLANT	CERTIFICATE
		SAINT GENIS LAVAL (Fresh pasta plant)	IFS
LUSTUCRU	FRANCE	LORETTE (Fresh pasta plant)	IFS
		COMMUNAY (Fresh pasta plant)	IFS
MUNDI RIZ	MOROCCO	LARACHE	ISO 22000
			IFS
			BRC
MUNDIRISO	ITALY	VERCELLI	ISO 22000
			ECOLOGICAL CERTIFICATION
			KOSHER
		LAMONTDE	FSSC 22000
		LA MONTRE	IFS
		GENNEVILLIERS	IFS
			IFS
5	FRANCE -	NANTERRE	FSSC 22000
PANZANI		LITTORAL	IFS
		SAINT JUST	IFS
		VITROLLES	IFS
			ECOLOGICAL CERTIFICATION
		LYON	ECOLOGICAL CERTIFICATION
			KOSHER
			HALAL
			PASTA DI GRAGNANO IGP
PASTIFICIO LUCIO			NON GMO VERIFIED PROJECT
GAROFALO	ITALY	GRAGNANO	ECOLOGICAL CERTIFICATION
			BRC
			IFS
			VEGAN
		MEMPHIS	SQF
		BRINKLEY	SQF
		CLEARBROOK	SQF
RIVIANA (RICE)	USA	ALVIN	SQF
		CARLISLE	SQF
		FREEPORT	SQF
		SAINT LOUIS	SQF
RIVIANA (PASTA)	USA	WINCHESTER	SQF
		FRESNO	SQF
ROLAND MONTERRAT	FRANCE	FEILLENS	IFS



COMPANY	COUNTRY	NAME OF PLANT	CERTIFICATE
		CAMPRIDOE	BRC
CAD LIEDDA FOODS	UK CAMBRIDO	CAMBRIDGE	KOSHER
S&B HERBA FOODS			BRC
		LIVERPOOL	KOSHER
	SPAIN	CASTELLCIR SPAIN	IFS
VEGETALIA SPAIN			ECOLOGICAL CERTIFICATION
	JEREZ DE LA FRONTERA	ECOLOGICAL CERTIFICATION	



## PRODUCT AND SERVICE LABELLING

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

### CUSTOMER AND CONSUMER SERVICES

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

The different customer services departments collect data and 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 checks and monitors the relevant quality system in case of error and 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 USED WITH CUSTOMERS
Arrozeiras Mundiarroz	Portugal	Telephone, e-mail, post and social media
Bertagni	Italy	Telephone, e-mail, website and social media
Boost Nutrition	Belgium	Telephone, e-mail, website and social media
Catelli - Olivieri	Canada	Telephone, e-mail, website and social media
Euryza	Germany	Telephone, e-mail, website and social media
Garofalo	Italy	Telephone, e-mail, website and social media
Herba Ricemills	Spain	Telephone and e-mail
Lassie	Netherlands	Telephone, e-mail, Website and social media
Lustucru	France	Telephone and post
Panzani	France	Telephone, e-mail, post and social media
Riceland	Hungary	Telephone, e-mail and website
Risella	Finland	Telephone
Riviana	USA	Telephone, e-mail, Website and social media

## INCIDENTS DURING THE YEAR

#### INCIDENTS REGISTERED WITH LARGE CUSTOMERS

Overall, 9 incidents were registered in 2018, 5 of which corresponded to a voluntary product recall in France and 4 to product name and labelling issues.

## **CLAIMS FROM END CONSUMERS**

The following table shows the number of claims (packaging defects, requests for information, sensory properties, etc.) handled during 2018, by company.

COMPANY	COUNTRY	NUMBER OF INCIDENTS
Arrozeiras Mundiarroz	Portugal	104
Bertagni	Italy	270
Boost Nutrition	Belgium	164
Catelli - Olivieri	Canada	2,239
Euryza	Germany	408
Garofalo	Italy	518
Herba Ricemills	Spain	1,091
Lassie	Netherlands	328
Lustucru	France	1,448
Panzani	France	6,709
Riceland	Hungary	75
Risella	Finland	123
District	LIOA	12,826 (rice)
Riviana	USA	17,508 (pasta)

None of the companies in the Ebro Group received any notification from customers during 2018 of incidents regarding privacy or data breaches.



# % PRODUCTION OUTSOURCED

The following table shows the percentage of production volume manufactured at certified sites by an independent third party according to internationally recognised food safety standards

COMPANY	PRODUCT MANUFACTURED	NAME OF PRODUCER	COUNTRY	% PRODUCTION
ARROZEIRAS	Noodles	Nissin Foods Kft.	Hungary	100%
MUNDIARROZ	Ready-to-Eat, Essential	Herba Ricemills	Spain	100%
	Gluten free pasta	Picchiotti	Italy	100%
BERTAGNI	Gnocchi	Crivellin - Il Pastaio di Brescia - Master - Grandi Pastai Italyni	Italy	100%
	Dry pasta	Griss	Canada	3.9%
	Dry pasta	Zerega	USA	1.4%
CATFLLL	GF Lasagne	Fazion	Italy	0.2%
CATELLI	Gnocchi	Lustucru	France	2%
	Sauce	DelGrosso	USA	1%
	Sauce	Inpralsa	Spain	1.3%
EBRO INDIA	Arroz	BB International	India	20%
	Preserved tomato	ICABA	Italy	100%
	Dry pasta	De Matteis Agroalimentare spa	Italy	100%
	Dry pasta	Newlat spa	Italy	100%
	Dry pasta	Soc Coop pastai gragnanesi	Italy	100%
	Dry pasta	Labor srl	Italy	100%
OADOFALO	Extra virgin olive oil	Manfredi Barbera & figli spa	Italy	100%
GAROFALO	Fresh pasta	PAC srl	Italy	100%
	Fresh pasta	Pastificio Gaetarelli srl	Italy	100%
	Fresh pasta	Bertagni spa	Italy	100%
	Gluten free pasta	Mennucci Spa	Italy	100%
	Potato balls	Il Pastaio srl	Italy	100%
	Wheat flour	Selezione Casillo srl	Italy	100%
GEOVITA	Shinode sushi rice	Mundiriso	Italy	3.8%
HERBA RICEMILLS	Long-grain cargo rice	Comunidad de Bienes San Andrés	Spain	2.4%
	Cereal mix	Huijbregts Groep, Helmond	Netherlands	0.1%
LASSIE	Rice colouring (yellow)	Huijbregts Groep, Helmond	Netherlands	0.46%
	Rice and pea-based fibre grains	Maselis, Roeselare	Belgium	0.08%







COMPANY	PRODUCT MANUFACTURED	NAME OF PRODUCER	COUNTRY	% PRODUCTION
	Cargo rice	Cascina Belvedere	Italy	0.15%
	Milled rice	Gariboldi spa	Italy	0.87%
	Milled rice	Riseria di Merlano	Italy	1.35%
MUNDI RISO	Parboiled rice	Parboriz	Italy	1.04%
	Parboiled rice	Riseria di Vespolate	Italy	5.33%
	Parboiled rice	Riso Scotti	Italy	0.79%
	Parboiled rice	Riso Viazzo	Italy	4.79%
	Calrose	ADM	USA	1%
	Jasmine rice	Herba BK	Spain	10.8%
	Mahatma/Carolina 20 pound	SemChi	USA	0.7%
	RTS & Basmati	Herba Ricemills	Spain	1.7%
DIV (I A N I A	SUP Rice Mixes	Pacmoore	USA	0.8%
RIVIANA	Dry pasta	Ferraro	Italy	0.1%
	Dry pasta	Granarolo	Italy	0.2%
	Dry pasta	Zerega	USA	1.4%
	Mac & Cheese	Quality Pasta	USA	0.1%
	Oven Ready lasagne	Fazion	Italy	0.5%
	Cereals and sugar	Ecobasics BIO	Spain	0.57%
	Nuts	Paño Fruits	Spain	0.48%
	Cupcakes and sponges	Las Granja Foods 1959	Spain	1.23%
	Pulse/egume-based dry pasta	S.A.P.A. Societe avignyonnaise de pates	France	1.84%
	Crisps	Aperitivos Añavieja	Spain	0.29%
VEGETALIA	Sausages	Biosurya	Spain	0.53%
	Maple syrup	Cofradex APS	Canada	0.25%
	Pulse-based snacks	Szimita trade	Hungary	0.11%
	Super foods	Raab Vitalfood	Germany	1.34%
	Rice cakes	Sanorice	Italy	4.5%
	Vinagers	JR Sabater	Spain	0.02%

## PROMOTION OF HEALTHY FOOD AND HEALTHY LIFESTYLES

The Ebro Group is investing heavily to complete all its brands on a global scale with a new category of products targeting health, putting new healthy products on the market based on concepts such as ancient grains, gluten free, quinoa, whole grain, high fibre, vitamins, minerals, etc., focusing increasingly on everything to do with organic and natural foods.

In 2018, sales of the Healthy segment accounted for 9.34% of the sales of companies selling health target products within the Ebro Group.



# DETAILS OF SALES IN THE HEALTHY FOOD RANGE, BY COMPANY

	TOTAL SALES HEALTHY SEGMENT (€)	% TOTAL SALES OF THE COMPANY 2018	TOTAL NET SALES (€)
Arrozeiras Mundiarroz	285,961	0.86%	33,328,915
Bertagni	1,538,895	1.95%	79,000,000
Catelli	22,784,402	16.93%	134,561,652
Celnat	20,831,133	98.54%	21,139,693
Garofalo	38,431,307	25.05%	153,391,369
Geovita	610,839	1.47%	41,679,000
Herba Ricemills	13,154,061	13.04%	100,900,614
Herba Ricemills Romania	376,352	6.43%	5,851,783
Lassie	1,717,453	6.41%	26,779,363
Lustucru	810,000	0.61%	132,556,000
Panzani	12,871,577	2.68%	479,652,250
Riceland Magyarorzag	410,849	6.08%	6,761,951
Riviana Arroz	59,298,961	9.61%	616,972,046
Riviana Pasta	22,749,605	8.38%	271,343,708
Stevens&Brotherton Herba Foods	1,779,180	1.45%	122,348,708
Vegetalia	11,373,340	100.00%	11,373,340
TOTAL	209,023,915	9.34%	2,237,640,391

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







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# EBRO FOODS, S.A.

# Commitment to the Environment

### SCOPE OF REPORTING

The information set out below corresponds to the 63 production plants that the Ebro Group has through its different companies.

The comparison of 2018 and 2017 is distorted by the fact that the figures from the following six companies have been added to the consolidated figures in 2018:

- Herba Ricemills, with 1 new plant in Los Palacios
- DEbrofrost UK, with 1 plant in the UK
- Dertagni, with 2 plants in Italy
- O Geovita, with 4 plants in Italy
- DEbrofrost North America, with 1 plant in USA (last year it was included in the Riviana questionnaire)
- Herba Cambodia (last year it was included in the Herba Thailand questionnaire).

REGION	NO. SITES REPORTING	COMPANIES
Europe	44	
Spain	12	Harinas Santa Rita (1), Herba Ricemills (9), Vegetalia (2)
Portugal	1	Mundiarroz
UK	4	Ebrofrost UK (1), S&B (3)
Italy	8	Bertagni (2), Garofalo (1), Mundiriso (1), Geovita (4)
France	11	Celnat (1), Lustucru (3), Panzani (6), Roland Monterrat (1)
Belgium	4	Boost (1), H.Ingredients (3)
Netherlands	2	Lassie, Herba Ingredients
Germany	1	Ebrofrost Germany
Denmark	1	Ebrofrost Denmark
North America	14	
USA	11	Riviana (10), Ebrofrost NA (1)
Canada	3	Catelli
Africa	2	
Morocco	1	Mundiriz
Egypt	1	Herba Egypt
Asia	3	
Thailand	1	H.Bangkok
India	1	Ebro India
Cambodia	1	H.Camboya



## **ENVIRONMENTAL MANAGEMENT**

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

- Air emissions: Mainly emissions of particles during the handling of cereals (rice and wheat) and greenhouse gas (GHG) emissions related to energy consumption, fossil fuels and electricity. The most widely used fuel is natural gas.
- Production processes: Essentially mechanical and hydrothermal, requiring the use of very few chemical products and in very small quantities. Most of these products are used to clean the equipment and cleanse the raw materials and are relatively harmless for the environment.
- Water consumption: The amount of water used in our processes is very small (the vast majority of our products are dry) so the volume of effluent generated is also small. Moreover, the little effluent produced has a low level of contamination since the water consumed is basically used to produce steam, for cooling or as an ingredient in the finished products.
- Waste generation and management: The Ebro Group generates minimal amounts of waste, both non-hazardous (mainly packaging of ingredients and ancillary materials) and hazardous (maintenance operations).

To minimise these impacts, Ebro Foods upholds protection of the environment as one of the basic principles of our activities and implements the necessary tools, measures and means in its companies to guarantee that protection. The Ebro Group takes measures to:

- Ensure that its companies comply with the environmental laws applicable to their respective activities by implementing internal management systems and monitoring the applicable laws and regulations.
- Minimise the environmental impact of its activity by seeking eco-friendly solutions and continually embarking on initiatives to reduce its emissions and waste generation and optimise its consumption of water, energy and packaging material.
- Manage all its waste adequately and safely, encouraging recycling and reuse. Use recycled raw materials and/or those respectful of the environment, whenever possible.
- Organise environmental awareness and training programmes for employees.

#### RESOURCES DEDICATED TO ENVIRONMENTAL RISK PREVENTION

Fifteen of the 28 companies covered by this report have reported investments in measures to reduce / optimise energy consumption, water consumption and GHG emissions.

Mundiarroz	Garofalo	Panzani
Boost	Herba Ricemills	Riviana Rice
Catelli	Lassie	Riviana Pasta
Celnat	Lustucru	Roland Monterrat
Ebrofrost North America	Mundi Riso	Vegetalia



	2017	2018
Expenditure in management and control	784,096 €	677,332 €
Investment to minimise impact	2,183,094 €	2,370,949 €
TOTAL	2,967,190 €	3,048,281 €

The investments reported here include measures to improve heat insulation, the installation of equipment to recover, reduce and optimise energy and water consumption, the installation of LED luminaires, the measurement of noise, particles emissions, and measurement and analysis of effluent.

#### PROVISIONS AND GUARANTEES FOR ENVIRONMENTAL RISKS

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

#### **ENVIRONMENTAL CERTIFICATION OR ASSESSMENT PROCEDURES**

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

#### NON-COMPLIANCE, FINES AND SANCTIONS

Only Arrozeiras Mundiarroz reported a small fine in 2018 for non-compliance with environmental laws and regulations.

YEAR	COMPANY	NON-COMPLIANCE	FINE/SANCTION
2018	Arrozeiras Mundiarroz	No certificate of technical inspection to detect gas leaks in cooling equipment (Granifrigor)	€6,075

The following production plants have an environmental management system certified under UNE-EN-ISO 14.001:

YEAR	COMPANY	COUNTRY	WORKPLACE	CERTIFICATE
2018	Garofalo	Italy	Gragnano	ISO14001
2018	Panzani	France	Littoral	ISO14001
2018	Panzani	France	Gennevilliers	ISO14001
2018	Panzani	France	Saint Just	ISO14001

### PRECAUTIONARY PRINCIPLE

The guidelines on which the precautionary principle are set out in the Group's Code of Conduct and CSR Policy:

- The Group declares its firm commitment to respect and preserve the environment.
- It sees that its companies comply with the environmental laws applicable to their operations and any additional commitments assumed voluntarily.
- Environmental sustainability programmes will be applied in specific matters.



### CIRCULAR ECONOMY AND WASTE MANAGEMENT AND PREVENTION

In Spain, to guarantee meeting the reduction, recycling and re-use targets defined in the Packaging and Packaging Waste Act 11/97 of 24 April, the 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 rice companies and the head offices of Ebro Foods have signed agreements with companies similar to Ecoembes for the destruction of paper and other data carriers. With these agreements, apart from complying with the Data Protection Act, they guarantee a sustainable management of the documentation through the undertaking by these companies to recycle the material.

We are analysing our contribution to CEFLEX, the collaborative initiative of a European consortium of companies and associations representing the entire value chain of flexible packaging. The CEFLEX Mission is to further enhance the performance of flexible packaging in the circular economy by designing and advancing better system solutions identified through the collaboration of companies representing the entire value chain.

#### **ACTIONS TO COMBAT FOOD WASTE**

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

They Ebro Group also participates actively in the programme "Don't waste food", a collaborative initiative to reduce food waste, led by AECOC, the association of large consumer companies.

The three principal objectives of the project are to:

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

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

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



# MEASURES FOR WASTE PREVENTION, RECYCLING, REUSE AND OTHER FORMS OF RECOVERY AND ELIMINATION

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

Some of the Group's rice companies use the husk from their manufacturing processes as a source of renewable energy. In 2018, Ebro India, Mundi Riso, Herba Ricemills and Vegetalia reported husk consumption as a source for generating heat energy.

Moreover, in 2019 Herba Ricemills, in alliance with other companies, is going to present a project in the LIFE Programme aiming to reuse rice husk and straw within the concept of circular economy, using a technological solution to create a new fireproof material or compound, with heat and sound insulating properties, that can be sold and used.

In addition, our subsidiary Herba Egypt, with the collaboration of the Ebro Foundation, has embarked on a project to reuse agricultural waste, especially rice straw, creating organic compost. The essential aim of the project is to make the residents of hamlets near our factory aware of the importance of preserving the environment, collaborating with farmers to find sustainable alternatives to burning rice straw. The compost project has not only helped to improve the quality of life of the local residents, but has also benefited the environment and is helping to build a circular economy model. Furthermore, with a view to building up a stronger, more integrated community, the project is being carried out by persons with disabilities from the village Kfr Bahout.

The first phase of the programme began in February 2018 and by October we had the first production of compost ready for sale on the market. It was also used to fertilize the local vegetable plots. Coinciding with this first production, a second phase was begun, during which the local travelling fruit and vegetable markets were encouraged to add the organic waste from their fruit and vegetables to the rice straw, thus generating larger quantities of compost.

At present, the project is making very satisfactory progress. We produce approximately three tonnes of organic waste a week, which is of the order of 144 tonnes a year, not counting the rice husk that will be mixed in to generate larger compost piles.

The aim is to continue increasing these quantities through successive awareness campaigns among growers and local residents.

#### WATER DISCHARGE

WATER DISCHARGE (M3)	2017	2018
Sewage	568,315	76,598
Process water	1,879,317	2,385,391
TOTAL WATER DISCHARGE	2,447,632	2,461,989

DESTINATION INDUSTRIAL EFFLUENT (M3)	2017	2018
Sewerage system or treatment facility	1,242,789	2,311,010
Inland waters	107,512	15,889
Marine waters	0	58,492
TOTAL	1,350,301	2,385,391



## **WASTE GENERATION**

All the hazardous waste is transferred to authorised waste disposal contractors for treatment according to the laws in place in each region.

Non-hazardous waste is separated by type and also handled by authorised waste disposal contractors, favouring recycling and reuse whenever possible.

WASTE (T)	2017	2018
Hazardous Non-hazardous	40	7,238
No Peligrosos	31,891	37,240
TOTAL WASTE	31,932	44,477
VOV. 11.71.77.77.77.77.77.77.77.77.77.77.77.7	2017	2010
NON-HAZARDOUS WASTE (T)	2017	2018
Recycling	9,743	11,650
Reuse	1,070	3,567
Landfill	9,509	9,953
Composting	1,607	1,954
Incineration	2,654	3,696
Other	5,660	3,318
TOTAL NON-HAZARDOUS WASTE	30,243	34,137
HAZARDOUS WASTE (T)	2017	2018
Recycling	0	7,035
Solidification & stabilization	0	5
Incineration	0	78
Pyrolisis	0	0
Landfill	0	1
Other	0	106
TOTAL HAZARDOUS WASTE	0	7,225

# SIGNIFICANT SPILLS

No spills occurred in 2018.





## SUSTAINABLE USE OF RESOURCES

### **RAW MATERIALS**

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

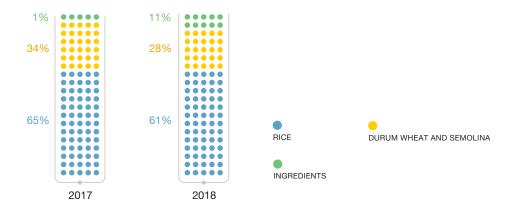
The raw materials used in finished goods are divided into two categories.

Agricultural: rice, durum wheat and quinoa

Processed: ingredients (ready-to-serve)

RAW MATERIALS FOR PRODUCT (T)	2017	2018
Rice	1,974,151	1,774,534
Durum wheat and semolina	1,026,675	799,946
Quinoa	3,091	4,164
Ingredients	44,414	325,108
TOTAL	3,048,331	2,903,752

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



INPUT MATERIALS FOR PACKAGING (T)	2017	2018
Paper	16,197	17,825
Cardboard	42,761	44,661
Plastic	17,424	46,144
Others	1,246	2,321
TOTAL	77,628	110,951



## RECYCLED PACKAGING MATERIALS

The recycled input materials used for packaging set out below are partial, since this indicator has not been reported globally by all the European companies (the North American companies have provided this information).

RECYCLED INPUT MATERIALS IN PACKAGING (T)	2017	2018
Recycled paper	3,839	2,212
Recycled cardboard	17,055	16,820
Recycled plastic	715	216
TOTAL	21,609	19,248

## **ENERGY CONSUMPTION**

The total energy consumption for the Ebro Group is shown below:

## DIRECT CONSUMPTION

CONSUMPTION NON-RENEWABLE ENERGY SOURCES (GJ)	2017	2018
Natural Gas	3,327,082	3,268,551
Others	65,935	53,460
TOTAL	3,393,017	3,322,011
CONSUMPTION RENEWABLE ENERGY SOURCES (GJ)	2017	2018
Biomass	118,424	93,146
		00.140
Total	118,424	93,146

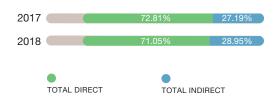
Biomass: is exclusively rice husk, a by-product of our industrial processes.

#### INDIRECT CONSUMPTION

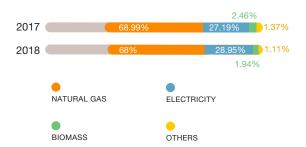
INTERMEDIATE ENERGY ACQUIRED AND CONSUMED (GJ)	2017	2018
Electricity	1,311,458	1,391,809
TOTAL	1,311,458	1,391,809

TOTAL ENERGY CONSUMPTION (GJ)	2017	2018
TOTAL DIRECT	4,822,900	4,806,966

## ENERGY CONSUMPTION / DIRECT & INDIRECT



## **ENERGY CONSUMPTION PER SOURCE**



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## **ENERGY INTENSITY**

RAW MATERIALS PRODUCT (T)	2017	2018
Total produced (t)	2,912,525	2,671,856
Total energy consumed (GJ)	4,822,900	4,806,966
ENERGY INTENSITY (GJ/T PRODUCT)	1.66	1.80



## REDUCTION OF ENERGY CONSUMPTION

Four group companies developed different initiatives in 2018 to reduce their energy consumption, by a total of €296,812.

COMPANY	INITIATIVE	COST (€)
BOOST NUTRITION	Luminaires	4,000 €
MUNDIRISO	Biomass boiler	52,380 €
PANZANI	Capacitor	30,000 €
PANZANI	Thermal insulation	125,346 €
PANZANI	Installation LED luminaires	44,000 €
RIVIANA PASTA	Installation LED luminaires (Fresno)	41,086 €
TOTAL		296,812 €

#### WATER CONSUMPTION

TOTAL VOLUME OF WATER WITHDRAWN (M3)	2017	2018
Tap water	3,310,017	2,843,088
Groundwater	242,308	902,660
TOTAL INDUSTRIAL PROCESSES	3,552,324	3,745,748
Surface water	17,340,000	16,150,000
TOTAL WATER WITHDRAWN	20,892,324	19,895,748

The surface water was not withdrawn for our industrial activity but the agricultural activity performed by the subsidiary Rivera del Arroz in Morocco.

	2017	2018
Groundwater	1.2%	4.5%
Surface water	83.0%	81.2%
Tap water	15.8%	14.3%

#### TOTAL WATER CONSUMPTION



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#### WATER RECYCLED AND REUSED

TOTAL VOLUME OF WATER RECYCLED AND REUSED (M3)	2017	2018
Recycled water	455,417	400,054
Reused water	53,681	0
TOTAL	509,098	400,054
% WATER RECYCLED & REUSED / GLOBAL CONSUMPTION	2017	2018
Recycled water	2.18%	2.01%
Reused water	0.26%	0.00%
TOTAL	2.44%	2.01%

#### CLIMATE CHANGE AND PROTECTION OF BIODIVERSITY

The Ebro Group takes an active approach to the promotion and investigation of environmentally sustainable growing techniques for application in the production of its principal agricultural raw materials (rice, durum wheat and tomatoes) and to contribute towards greater preservation of the environment, biodiversity and mitigation of climate change by applying growing techniques to reduce crop emissions. This work is done through own initiatives and specific collaborations with stakeholders and sectoral associations, particularly the Sustainable Agriculture Initiative Platform (SAI Platform) and the Sustainable Rice Platform<sup>1</sup>.

The Ebro Group is also a member of the Climate Change Cluster promoted by (www.foretica.org). In that Cluster, a group of large companies work together to lead the strategic positioning addressing climate change in the business agenda, discuss and exchange views and good practices, be part of the global debate and become key players in the decisions made at the administrative level.

Moreover, within our commitment to the rest of our value chain, in 2016 we started using the Sedex platform as a management tool, a programme to monitor the environmental (social and governance) -ESG- performance of our industrial suppliers through ethics audits and collaboration with them where necessary to enhance their environmental practices. During 2018 we continued working on the engagement stage, explaining our initiative to suppliers and asking them to register with SEDEX to assess their CSR performance. When this stage is concluded, we will make a risk analysis to define priorities for the ethics audit plan to be developed (last stage).

## OPERATIONAL SITES IN, OR ADJACENT TO, PROTECTED AREAS OR AREAS OF HIGH BIODIVERSITY VALUE OUTSIDE PROTECTED AREAS

Of our 63 production plants, only the Riviana rice plant in Freeport, Texas is adjacent to a wetland with protected area status, Brazos River.

## SIGNIFICANT IMPACTS OF ACTIVITIES, PRODUCTS, AND SERVICES ON BIODIVERSITY

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

## HABITATS PROTECTED OR RESTORED

No restoration measures have been implemented in protected habitats.

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These projects can be consulted in the chapter Management of the Supply Chain.



#### WATER SOURCES SIGNIFICANTLY AFFECTED BY WATER WITHDRAWAL

There has been no impact on water bodies or habitats of high biodiversity value.

## SIGNIFICANT SPILLS [306-3] AND WATER BODIES AFFECTED BY WATER DISCHARGES AND/OR RUNOFF

There have been no significant spills or any impact on habitats of high biodiversity value.

#### **POLLUTION**

In 2016, Herba Ricemills obtained the Environmental Product Declaration (EPD) Certificate for its 1 kg packs of SOS short-grain and long-grain rice. This environmental declaration was prepared following the methodology of product Life Cycle Assessment (LCA), including the entire production chain from the rice growing, industrial phase and distribution of the packaged product, its use for human consumption and final disposal of the material.

The LCA study is based on the following ISO standards and product category rule indicated below:

- ISO 14040:2006 Environmental management Life cycle assessment Principles and framework
- ISO 14044:2006 Environmental management Life cycle assessment Requirements and guidelines
- ▶ ISO 14025:2006 Environmental labels and declarations Type III environmental declarations Principles and procedures
- PCR: 2013:04 v 1.02; UN CPC 231, GRAIN MILL PRODUCTS; version 1.02.

The LCA revealed that the stages with the greatest environmental impact as regards greenhouse gas emissions are the agricultural stage (45-54%) and the use and final disposal of the product (33-36%), the industrial stage being the one with the least environmental impact (10-17%).



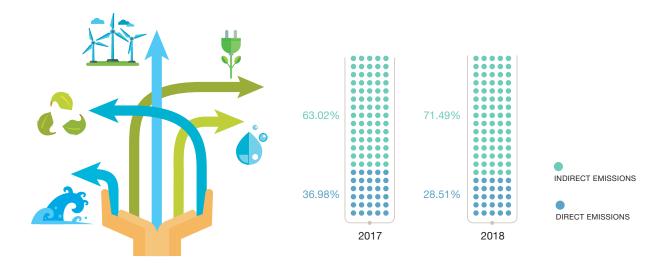




## DIRECT AND INDIRECT GHG EMISSIONS (SCOPES 1 AND 2)

GHG EMISSIONS (T CO2-EQ )	2017	2018
Direct emissions	191,256	186,993
Indirect emissions	325,979	468,782
TOTAL EMISSIONS	517,234	655,775

#### GHG EMISSIONS (T CO2-EQ)



## OTHER INDIRECT GHG EMISSIONS (SCOPE 3)

In 2015, the rice division of Ebro Foods contracted its main shipping service provider, EccoFreight, to calculate the carbon footprint of shipping our raw materials and products.

This calculation is made using the tool Eccoprint developed by EccoFreight and has a gate-to-gate scope, including the transport (by rail and/or road) from the source plant to the port of departure and from the port of arrival to our plants.

In 2018, EccoFreight handled 74% of the shipments managed by Herba Ricemills for the entire Group, with 202,790 tonnes shipped (11,218 TEUs) and the GHG emissions totalled 33.894 t of CO2 eq. These emissions are not counted to calculate the indicator 305-3.

Moreover, in 2017 Ebro Foods started using the Cool Farm Tool predictive model of Cool Farm Alliance, of which it is a member, to estimate the GHG emissions generated in the production of its agricultural produce, which account for over 50% of the carbon footprint of its products in the case of rice.



## **GHG EMISSIONS INTENSITY**

	2017	2018
Total produced (t)	2,912,525	2,671,856
Total GHG emissions (t CO2-eq )	517,234	655,775
GHG emissions intensity (t CO2-eq /t product)	0.18	0.25



#### **EMISSIONS OF OZONE-DEPLETING SUBSTANCES**

We are analysing the materiality of this indicator. So far, we only have partial data for some plants, so it will not be reported this year.

#### NOX, SOX AND OTHER SIGNIFICANT AIR EMISSIONS

We are analysing the materiality of this indicator. So far, we only have partial data for some plants, so it will not be reported this year.

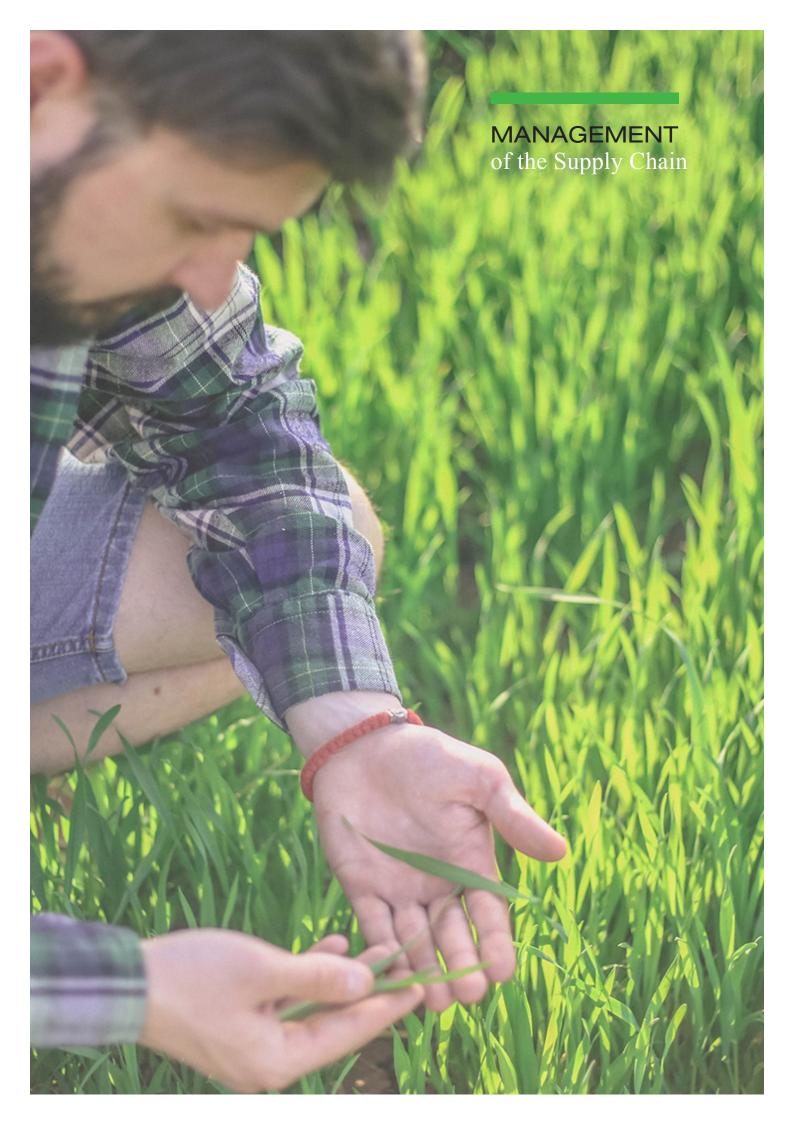
#### **GREENHOUSE GAS REDUCTION GOALS**

At the end of 2018, the Ebro Group drew up its Global Sustainability Plan 2030, defining three work packages, one of which corresponds to reduction of our environmental impact.

#### WORK PACKAGES AND AREAS OF ACTION



Based on this Global Sustainability Plan, the Group companies will work on their individual goals during the coming year.



# MANAGEMENT OF THE SUPPLY CHAIN

OUTSOURCING AND SUPPLIERS	Pag 81
SUPPLY CHAIN FOR AGRICULTURAL RAW MATERIALS	Pag 82



## EBRO FOODS, S.A. Management of the Supply Chain

#### **OUTSOURCING AND SUPPLIERS**

The main aim of the sustainable management of the Ebro Group is to guarantee the sustainability of its products throughout the entire value chain. The first and principal link in this chain is the production and sourcing of its agricultural and auxiliary raw materials. The Group is acting directly and in two ways with the main players in its supply chain. On the one hand, it is working side by side with growers to promote sustainable agriculture in environmental, economic and social aspects; and on the other, it is controlling the performance of its industrial suppliers in respect of corporate responsibility through internal or external audits and collaborating with them to secure continuous improvement.

With its structure as a multi-brand, multi-company, multi-country enterprise, certain management areas in the companies of the Ebro Group are decentralised, as is the case of the Procurements Area. In this scenario, each subsidiary has its own policies aligned with the laws and circumstances of the companies in which they operate. Therefore, no integral corporate management of our suppliers has been fully developed on a global level within the Group.

At present, we have three main tools on a corporate level to control our suppliers: 1) visits and meetings with the Procurements Departments of our subsidiaries; 2) the Sedex Platform, in which some of the suppliers of certain Group companies have been gradually included and are audited by an independent third party; 3) the Ebro Foods Supplier Code of Conduct, which sets out to regulate the rules of social and environmental conduct by the Group's suppliers. So far, 100% of the suppliers of our Herba Bangkok have subscribed to this Code, 99% of those of Herba Cambodia and 80% of those of Ebro India. The process is rather complicated and time-consuming.

In our desire to achieve integral management of the supply chain, we are starting to develop a work plan, according to which all the company's suppliers will be classified into three groups as from 2019: agricultural raw material suppliers, auxiliary raw material suppliers and service providers. We intend to map our subsidiaries and draw up a roadmap with them to achieve the goal that by 2030, 100% of our suppliers have signed the Group's Supplier Code of Conduct or incorporate ESG criteria in their policies.









## LIST OF AUDITS ON SUPPLIERS MADE IN 2017-2018

SUPPLIER	PLANT	COUNTRY	DATE	AUDIT
RISO SCOTTI S.P.A.	RISO SCOTTI S.P.A.	ITALY	28/09/2018	BVCERT 4 Pilar Audits
MONDI BÉKÉS CS ABA LTD	MONDI BÉKÉS CS ABA KFT	HUNGARY	28/09/2018	BVCERT 4 Pilar Audits
GRAPHIC PACKAGING INTERNATIONAL LLC	MONDI PACKAGING IGUALADA	SPAIN	26/09/2018	BVCERT 4 Pilar Audits
VENUS GROWERS	ALEXANDRIA	GREECE	14/06/2018	Intertek Bulgaria
VENUS GROWERS	VERIA	GREECE	13/06/2018	Intertek Bulgaria
GREAT GIANT PINEAPPLE COMPANY	GRAT GIANT PINEAPLE CO CANNERY AND PLANTATION	INDONESIA	07/06/2018	BVCERT 4 Pilar Audits
ENGRO EXIMP AGRIPRODUCTS (PVT) LIMITED	INTEGRATED RICE PROCESSING COMPLEX (IRPC)	PAKISTAN	04/05/2018	Elevate Limited
GEOVITA SRL	GEOVITA SRL	ITALY	19/02/2018	SGS CBE
MONDI CONSUMER PACKAGING GMBH	MONDI KORNEUBURG GMBH	AUSTRIA	23/01/2018	BVCERT 4 Pilar Audits
MUNDI RISO SRL	MUNDI RISO	ITALY	18/12/2017	SGS CBE
EBRO FOODS NEDERLAND BV	LASSIE	NETHERLANDS	10/11/2017	Intertek UK
GALAXY RICE MILL	GALAXY RICE MILL	PAKISTAN	03/08/2017	Elevate Limited
CASARONE AGROINDUSTRIAL S.A.	ARROZUR S.A.	URUGUAY	28/06/2017	SGS
CASARONE AGROINDUSTRIAL S.A.	PLANTO JOSÉ P. VARELA	URUGUAY	27/06/2017	SGS

#### SUPPLY CHAIN FOR AGRICULTURAL RAW MATERIALS

## SUSTAINABLE AGRICULTURAL RAW MATERIAL

After joining the SAI Platform in 2015, during 2016 the Ebro Group took another step forward in its commitment to the sustainable production of its agricultural raw materials, particularly rice, by becoming a member of the *Sustainable Rice Platform* (SRP, <a href="http://www.sustainablerice.org/">http://www.sustainablerice.org/</a>). The SRP is a multi-stakeholder initiative co-convened by the UN Environment (UNEP) and the International Rice Research Institute (IRRI, <a href="http://irri.org/">http://irri.org/</a>), to promote sustainability in the rice sector, especially Asian (<a href="http://www.sustainablerice.org/About-Us/">http://www.sustainablerice.org/About-Us/</a>), paying special attention to smallholders.

In this context, the Ebro Group has begun to use the sustainable crop standards of the SAI and the SRP as qualitative benchmarks in the different initiatives and projects that it has set up to improve the sustainability of growers in its sourcing regions.

In this context, with regard to durum wheat and tomatoes, the French subsidiary Panzani is developing the programme "Nature" with a view to changing the growing practices of the suppliers in its supply chain so that their raw materials are free from pesticide residues by 2025.

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With regard to rice, the Group has continued working in collaboration with other stakeholders on the development of projects to enhance environmental sustainability and preserve biodiversity in different production areas. The most representative examples of this work are:

- "Sustainable Hom Mali Rice programme": Our subsidiary Herba Bangkok, Mars Food, Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) and the Thai Rice Department have jointly created an innovative programme to improve the economic viability of 1,200 Thai rice growers and develop high quality, sustainable Hom Mali rice (Jazmine rice) using a Climate-Smart system to mitigate climate change in the province of Roi Et. This programme will be developed over a period of two and a half years, from 2018 to 2020.
- Biodiversity in the Ebro Delta: Through the collaboration of Ebro Foods and Kellogg with the Institute for Research and Technology in Food and Agriculture (IRTA), biodiversity management was studied for the benefit of the rice crop and its sustainability in the Ebro Delta. The IRTA researchers made this analysis with active collaboration from growers, along with sector and environmental experts, to identify the best measures to protect biodiversity in the paddy fields while assisting growers. They took into account agricultural, environmental, economic and social factors. The study concluded that the measures most highly valued by the agricultural community and most effective in in enhancing biodiversity in this region were to plant yellow flag to maintain the stability of the drainage channels and increase the bat population by installing artificial roosts (bat boxes) to improve pest control.
- Oryzonte" Programme: This project, developed at the Guadalquivir Marshes (Seville) together with Mars Food and Danone, works on three core areas:
  - 1. Good growing practices: training of growers in eco-friendly growing practices, such as the enhanced use of fertilizers and chemical products.
  - 2. Reduction of water consumption and GHG emissions.
  - 3. Biodiversity: the project will foster the implementation of measures to enhance biodiversity at the Seville rice farms, with demonstration fields and training activities.
- **EKTA Project (India):** With a view to improving the social and economic conditions of local farmers, increase the yield from their crops and ensure that their rice was of high quality and healthy, our subsidiary Ebro India began the EKTA (Ebro Kissan Training and Awareness) programme in 2015. EKTA is an agricultural training programme that stresses the need for adequate use of pesticides, one of the main problems for food safety in the country. During 2018 the programme was extended to a further 100 rural hamlets (50 in 2017), bringing on board around 2,500 new growers. The project, in which a large number of professionals from Ebro India participate as volunteers alongside an expert from Haryana University, extended its training tools this year and in addition to informative sessions, it has made a radio programme available for farmers, in which farmers are able to ask questions live to a rice crop specialist, as well as brochures and posters with technical information, warnings and indications. The results of subsequent pesticide measuring in the areas in which training has been given show a considerable reduction from the levels measured in the previous year.
- Control Farming: This is an agronomic improvement programme developed in India to educate farmers in the correct use of pesticides and fungicides in terms of quantity, quality and time. The implementation of correct agricultural practices has been fully monitored from sowing to harvesting. The rice produced in these harvests is bought by Ebro India, paying an extra per tonne.
- Organic Farming: This project is developed in India with 1,300 growers in the regions of Uttar Pradesh and Jammu, with a view to converting traditional rice-growing land to organic rice-growing land..
- SAIRISI (Italia): This is a project developed in collaboration with several members of SAI-P (Unilever, Kellogg, Migros), aiming to assess growers in accordance with the SAI-P standard, providing specific training given by Enterisi and professionals from the sector (Universities, NGOs, etc.) to improve their performance. The principal subject

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matters studied are: precision agriculture, conservation agriculture, use of nutrients and fertilizers, and environmental, agronomic and biodiversity enhancement practices backed by El CAP / PSR. Another of the challenges that the SAIRISI group wants to address is the control and potential mitigation of methane emissions in rice fields. One of the special aspects of this project is that it brings under one roof growers, rice mills, business and retailers with the aim of improving the sustainability of the crop.

#### **DETAILS OF OUR SUPPLY CHAIN**

The information reported in this section only takes into account the supply chains of the agricultural raw materials rice, durum wheat and quinoa, which account for the bulk of the raw materials used by the Ebro Group.

Both rice and durum wheat are purchased from three types of 1st tier suppliers, which may vary according to the countries in which the raw material is sourced:

- Farmers or cooperatives
- Millers and/or plants
- Traders

Quinoa is mainly purchased from cooperatives of farmers and millers.

There is relatively little variation from one year to the next in the pool of countries in which we source materials but do not operate, the direct suppliers we use in those countries and the volumes purchased per supplier category. However, within those categories, the operators from whom we buy and the volumes bought from each one may very considerably depending on our needs in respect of price, quality, customer specifications, etc.





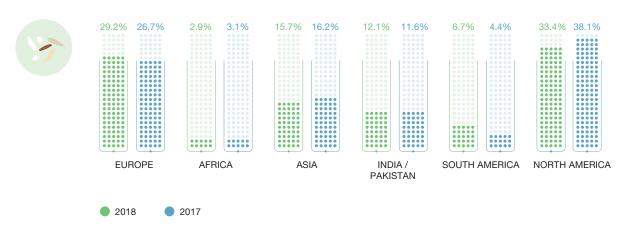
## **VOLUMES BY ORIGIN**

## **Rice**

The rice supplies for the Ebro Group have been very stable over the past two years in both total volume and volume by origin, our most important sourcing regions being North America and Europe (see Fig. 1).

	2017	2018
	TONNES	TONNES
Europe	426,126	434,512
Africa	49,226	42,619
Asia	257,791	233,424
India/Pakistan	184,184	179,521
South America	69,815	100,090
North America	606,563	495,759
TOTAL	1,593,705	1,485,925

## RICE SOURCING / ORIGINS (FIGURE 1)







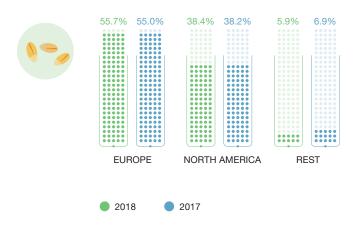


## **Durum wheat**

The Ebro Group sources its durum wheat mainly in Europe and North America, France and the USA being the two most important countries in purchase volume. (see Fig. 2).

	2017	2018
	TONNES	TONNES
North America	315,828	326,250
Europe	455,218	472,741
Rest	56,800	49,982
TOTAL	827,846	848,973

## WHEAT SOURCING / ORIGINS (FIGURE 2)







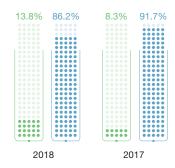
## Quínoa

The Ebro Group sources its quinoa mainly in South America, and a very small percentage in Europe (see Fig. 3).

	2017	2018
	TONNES	TONNES
South America	3,272	3,255
Europe	298	521
TOTAL	3,570	3,776

## QUINOA SOURCING / ORIGINS (FIGURE 3)





EUROPE SOUTH AMERICA







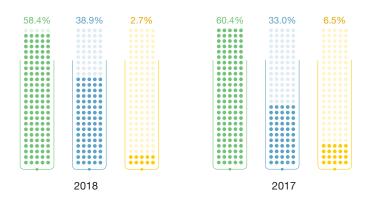
## **VOLUME BY SUPPLIER**

## **Rice**

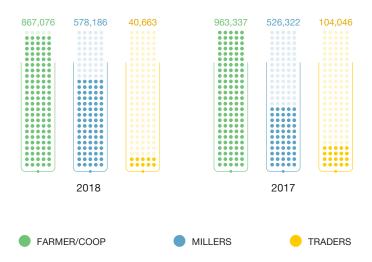
On a global level, the vast majority of the rice is bought directly from farmers or cooperatives and the rest from millers and traders (see Fig. 4).

## FIGURE 4

#### RICE SOURCING / 1ST TIER SUPPLIERS



## RICE SOURCING / 1ST TIER SUPPLIERS (T)



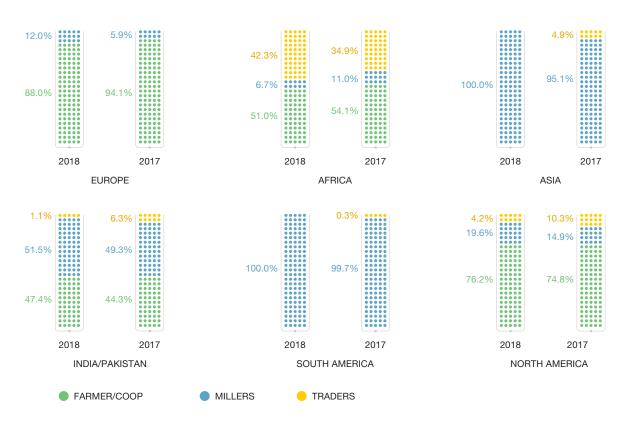




At a disaggregated level, this volume/supplier distribution varies considerably from one geographical region to another, but remains relatively constant for each region between 2017 and 2018 (see Fig. 5).

#### FIGURE 5

#### RICE SOURCING / 1ST TIER SUPPLIERS / ORIGINS



#### RICE SOURCING (T) / 1ST TIER SUPPLIERS / ORIGINS



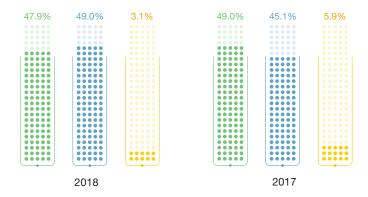


## **Durum wheat**

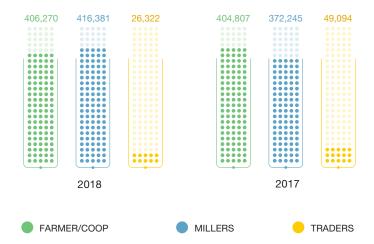
On a global level most of the wheat is sourced directly from farmers or cooperatives, and millers. The rest of the volume is bought from traders (see Fig. 6).

## FIGURE 6

#### WHEAT SOURCING / 1ST TIER SUPPLIERS



#### WHEAT SOURCING / 1ST TIER SUPPLIERS (T)







At a disaggregated level, the direct suppliers are totally different for each geographical region: mainly farmers or cooperatives in Europe and traders in North America (see Fig. 7).

#### FIGURE 7

#### WHEAT SOURCING / 1ST TIER SUPPLIERS / ORIGINS



#### WHEAT SOURCING (T) / 1ST TIER SUPPLIERS / ORIGINS

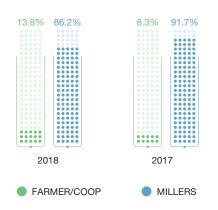


#### Quinoa

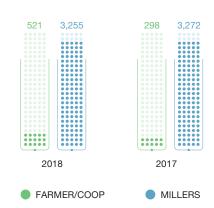
In 2018 most of the quinoa was sourced directly from mills. The remaining volume was purchased from farmers and cooperatives. (see Fig. 8).

#### FIGURE 8

#### QUINOA SOURCING / ORIGINS



#### QUINOA SOURCING / ORIGINS (T)

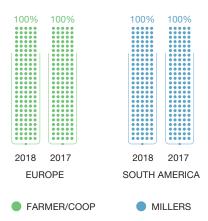




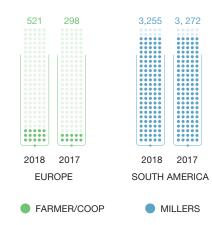
At a disaggregated level, the direct suppliers are totally different for each geographical region: farmers or cooperatives in Europe and mills in North America (see Fig. 9).

## FIGURE 9





QUINOA SOURCING (T) / 1ST TIER SUPPLIERS / ORIGINS









## 102 GENERAL DISCLOSURE

	INDICATOR	DESCRIPTION	REFERENCE/DIRECT RESPONSE
	102-1	Name of the organization	EBRO FOODS, S.A.
	102-2	Activities, brands, products, and services	https://www.ebrofoods.es/en/businesses-and-innovation/brands
	102-3	Location of headquarters	CSRR - P.7
	102-4	Location of operations	AR - P.4, P.15-16
	102-5	Ownership and legal form	CGR - P. 5-6
	102-6	Markets served	AR - P.4, P.14-17
Organizational profile	102-7	Scale of the organization	AR - P.4-5, P.14-17
	102-8	Information on employees and other workers	CSRR - P.37-53
	102-9	Supply chain	CSRR - P.81-92
	102-10	Significant changes to the organization and its supply chain	CSRR - P.7
	102-11	Precautionary principle or approach	All the operations of the Ebro Group are assessed according to the principles laid down in the different governance policies
	102-12	External initiatives	CSRR - P.15
Strategy	102-14	Statement from senior decision-maker	AR - CHAIRMAN'S STATEMENT, P.32-33
	102-15	Key impacts, risks, and opportunities	AR - P.29-33
	102-16	Values, principles, standards, and norms of behavior	AR - P.12-14
Ethics and integrity	102-17	Mechanisms for advice and concerns about ethics	CODE OF CONDUCT https://www.ebrofoods.es/en/information-for- shareholders-and-investors/code-of-coduct/
	102-18	Governance structure	CGR
	102-19	Delegating authority	CGR
	102-20	Executive-level responsibility for economic, environmental and social topics	CGR
	102-21	Consulting stakeholders on economic, environmental and social topics	CSRR - P.11-12
	102-22	Composition of the highest governance body and its committees	CGR, AR - P.19-22
	102-23	Chair of the highest governance body	CGR, https://www.ebrofoods.es/en/information-for- shareholders-and-investors/corporate-governance/ regulations-of-the-general-meeting/
Cavarana	102-24	Nominating and selecting the highest governance body	CGR, https://www.ebrofoods.es/en/information-for- shareholders-and-investors/corporate-governance/ regulations-of-the-general-meeting/
Governance	102-25	Conflicts of interest	CGR
	102-26	Role of highest governance body in setting purpose, values, and strategy	CGR
	102-27	Collective knowledge of highest governance body	CGR
	102-28	Evaluating the highest government body's performance	CGR
	102-29	Identifying and managing economic, environmental and social topics	CGR
	102-30	Effectiveness of risk management processes	CGR
	102-31	Review of economic, environmental, and social topics	CGR, AR - P.25-26
	102-35	Remuneration policies	AR, CSRR - P.51-53

102 GENERAL DISCLOSURE

	INDICATOR	DESCRIPTION	REFERENCE/DIRECT RESPONSE
	102-40	List of stakeholder groups	CSRR - P.10-11
Stakeholder	102-41	Collective bargaining agreements	CSRR - P.46-48
engagement	102-42	Identifying and selecting stakeholders	CSRR - P.10-11
	102-44	Key topics and concerns raised	CSRR - P.11-12
	102-45	Entities included in the consolidated financial statements	NOTE 4 CONSOLIDATED ANNUAL ACCOUNTS https://www.ebrofoods.es/wp-content/uploads/2019/04/ English-Cuentas-anuales-consolidadas-2018.pdf
	102-46	Defining report content and topic boundaries	CSRR - P.4-7
	102-50	Reporting period	CSRR - P.4
	102-51	Date of most recent report	CSRR - P.4
<b>.</b>	102-52	Reporting cycle	CSRR - P.4
Reporting practice	102-53	Contact point for questions regarding the report	CSRR - P.7
	102-54	Claims of reporting in accordance with the GRI Standards	CSRR - P.4
	102-55	GRI content index	CSRR - GRI TABLE P.93
	102-56	External assurance	MOST OF THE CONTENTS OF THIS REPORT CORRESPOND TO THE NON-FINANCIAL INFORMATION STATEMENTS AUDITED BY EY

103 MANAGEMENT APPROACH			
INDICATOR	DESCRIPTION	REFERENCE/DIRECT RESPONSE	
103-1	Explanation of the material topic and its boundary	CSRR - P.11-12	
103-2	The management approach and its components	CSRR - P.9-13	
103-3	Evaluation of the management approach	CSRR - P.9-13	

200 ECONOMIC DISCLOSURES			
	INDICATOR	DESCRIPTION	REFERENCE/DIRECT RESPONSE
201 Economic	201-1	Direct economic value generated and distributed	CSRR - P.22
performance	201-2	Financial implications and other risks and opportunities due to climate change	CSRR - P.75-78
202 Market presence	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	CSRR - P.50-51
203 Indirect economic	203-1	Infrastructure investments and services supported	CSRR - P.22-34
impacts	203-2	Significant indirect economic impacts	CSRR - P.22-34
204 Procurement practices	204-1	Proportion of spending on local suppliers	P.108 CONSOLIDATED ANNUAL ACCOUNTS https://www.ebrofoods.es/wp-content/uploads/2019/04/ English-Cuentas-anuales-consolidadas-2018.pdf
205 Anti-corruption	205-1	Operations assessed for risks related to corruption	CSRR - P.20-21
	205-2	Communication and training about anti- corruption policies and procedure	CSRR - P.20-21
	205-3	Confirmed incidents of corruption and actions taken	NO CASES OF CORRUPTION HAVE BEEN REPORTED. CSRR - P.21
206 Anti-competitive behavior	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	NO INCIDENTS HAVE BEEN REPORTED DURING THE YEAR

	INDICATOR	DESCRIPTION	REFERENCE/DIRECT RESPONSE
001 Matariala	301-1	Materials used by weight or volume	CSRR - P.72
301 Materials	301-2	Recycled input materials used	CSRR - P.73
	302-1	Energy consumption within the organization	CSRR - P.73
302 Energy	302-3	Energy intensity	CSRR - P.74
	302-4	Reduction of energy consumption	CSRR - P.74
	303-1	Water withdrawal by source	CSRR - P.74
303 Water	303-2	Water sources significantly affected by withdrawal of water	CSRR - P.76
	303-3	Water recycled and reused	CSRR - P.75
204 Piediversity	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	CSRR - P.75
304 Biodiversity	304-2	Significant impacts of activities, products, and services on biodiversity	CSRR - P.75
	304-3	Habitats protected or restored	CSRR - P.76
	305-1	Direct (Scope 1) GHG emissions	CSRR - P.77
	305-2	Energy indirect (Scope 2) GHG emissions	CSRR - P.77
	305-3	Other indirect (Scope 3) GHG emissions	CSRR - P.77
005 Facilities	305-4	GHG emissions intensity	CSRR - P.78
305 Emissions	305-5	Reduction of GHG emissions	CSRR - P.78
	305-6	Emissions of ozone-depleting substances (ODS)	CSRR - P.78
	305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	CSRR - P.78
	306-1	Water discharge by quality and destination	CSRR - P.70
	306-2	Waste by type and disposal method	CSRR - P.71
306 Effluents and waste	306-3	Significant spills	CSRR - P.71, 76
	306-5	Water bodies affected by water discharges and/or runoff	CSRR - P.76
307 Environmental compliance	307-1	Non-compliance with environmental laws and regulations	CSRR - P.78
308 Supplier environmental assessment	308-1	New suppliers that were screened using environmental criteria	CSRR - P.81-82
	308-2	Negative environmental impacts in the supply chain and actions taken	NO ENVIRONMENTAL IMPACT HAS BEEN REPORTED IN THE SUPPLY CHAIN. THE EBRO GROUP DEVELOPS DIFFERENT SUSTAINABLE AGRICULTURE PROGRAMS WITH ITS SUPPLIERS: CSRR - P.82-84

	ı	400 SOCIAL DISCLOSURES	
	INDICATOR	DESCRIPTION	REFERENCE/DIRECT RESPONSE
	401-1	New employee hires and employee turnover	CSRR - P.43
401 Employment	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	CSRR - P.45
	401-3	Parental leave	CSRR - P.46
	403-1	Workers representation in formal joint management–worker health and safety committees	CSRR - P.46-47
403 Occupational health and safety	403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	CSRR - P.47
	403-3	Workers with high incidence or high risk of diseases related to their occupation	NO JOB WITHIN THE GROUP HAS A HIGH RISK OF DISEASE
	403-4	Health and safety topics covered in formal agreements with trade unions	CSRR - P.47
	404-1	Average hours of training per year per employee	CSRR - P.48-49
404 Training and education	404-2	Programs for upgrading employee skills and transition assistance programs	CSRR - P.48-49
	404-3	Percentage of employees receiving regular performance and career development reviews	CSRR - P.50
405 Diversity and equal opportunities	405-1	Diversity of governance bodies and employees	CSRR - P.38-40, 49
	405-2	Ratio of basic salary and remuneration of women to men	CSRR - P.51-52
406 Non-discrimination	406-1	Incidents of discrimination and corrective actions taken	CSRR - P.18
407 Freedom of association and collective bargaining	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	CSRR - P.18-19, 81-82
408 Child labor	408-1	Operations and suppliers at significant risk for incidents of child labor	CSRR - P.18-19, 81-82
409 Forced or compulsory labor	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	CSRR - P.18-19, 81-82
410 Security practices	410-1	Security personnel trained in human rights policies or procedures	CSRR - P.19
411 Rights of indigenous peoples	411-1	Incidents of violations involving rights of indigenous peoples	NONE OF THE GROUP'S OPERATIONS ARE PERFORMED IN LOCATIONS WITH INDIGENOUS PEOPLES
412 Human rights	412-1	Operations that have been subject to human rights reviews or impact assessments	CSRR - P.18-19
assessment	412-2	Employee training on human rights policies or procedures	CSRR - P.18-19
413 Local communities	413-1	Operations with local community engagement, impact assessments, and development programs	CSRR - P.24-34
	413-2	Operations with significant actual and potential negative impacts on local communities	NO GROUP OPERATION HAS MATERIAL NEGATIVE IMPACTS ON LOCAL COMMUNITIES



400 SOCIAL DISCLOSURES			
	INDICATOR	DESCRIPTION	REFERENCE/DIRECT RESPONSE
415 Public policy	415-1	Political contributions	CSRR - P.21
416 Customer health	416-1	Assessment of the health and safety impacts of product and service categories	CSRR - P.55-59
and safety	417 Marketing and labeling	Incidents of non-compliance concerning the health and safety impacts of products and services	NO INCIDENTS REPORTED OF NON-COMPLIANCE CONCERNING HEALTH AND SAFETY IMPACTS
417 Marketing and labeling	417-1	Requirements for product and service information and labeling	CSRR - P.60
	417-2	Incidents of non-compliance concerning product and service information and labeling	CSRR - P.61
	418 Customer privacy	Incidents of non-compliance concerning marketing communications	NO INCIDENTS REPORTED OF NON-COMPLIANCE CONCERNING MARKETING COMMUNICATIONS
418 Customer privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	NO INCIDENTS OF NON-COMPLIANCE REPORTED. CSRR - P.61
419 Socioeconomic compliance	419-1+C20:C122	Non-compliance with laws and regulations in the social and economic area	NO INCIDENTS OF NON-COMPLIANCE REPORTED