ESRS E3
Water and marine resources

LIST OF IROS ASSOCIATED WITH E3

Impacts, Risks and Opportunities

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

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

KEY: Value Chain (VCh)
Ups: Upstream OO: Own Operations Dow: Downstream

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

- Its pasta production and pre-cooked food processes and the production of dry rice. The latter is much less intensive and has minimal consumption.
- Consumption of water used by the subsidiary Agromeruan (Morocco) for farming the agricultural land it leases. It has 1,593 ha, of which only 924 ha are used for rice-growing. This is the only agricultural process performed by the Group.

IRO-1 DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL WATER AND MARINE RESOURCES-RELATED IMPACTS, RISKS AND OPPORTUNITIES

***(8)**

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

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

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

The IROs identified as material in the DMA were:

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

E3-1. POLICIES RELATED TO WATER AND MARINE RESOURCES

***(11,12,13)**

SUSTAINABILITY, ENVIRONMENTAL AND CORPORATE SOCIAL RESPONSIBILITY POLICY	
MDR-P 65 (a) **E3-1; 12** **E3-1; 13**	**Contents:** Through this Policy, the Group makes sustainable growth the pillar of its business management strategy, undertaking commitments to its principal stakeholders, namely its professionals, shareholders, communities, public and environment. The environment-related principles, commitments, targets and strategy establish the undertaking to guide the organisation's processes, activities and decisions to protect the environment and prevent and minimise our environmental impacts. Oversight and monitoring fall within the remit of the Audit, Control and Sustainability Committee, which reports to the Board of Directors.
MDR-P 65 b-f)	**See E1-2**

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

E3-2. ACTIONS AND RESOURCES RELATED TO WATER AND MARINE RESOURCES

***(17,19)**

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

MDR-A: Actions and resources related to water and marine resources

ACTION		SCOPE	COMPANY	HORIZON	CAPEX (€ 000)	OPEX	CAPEX 2026 & later (€ 000)
Reduction of use of water	Recirculation of water from steaming	OO	Riviana Foods	Short term	77		
				(€ 000)	**77**	**0**	**0**

KEY: Scope
Ups: Upstream OO: Own Operations Dow: Downstream

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

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

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

E3-3. TARGETS RELATED TO WATER AND MARINE RESOURCES

***(22)**

At present the Ebro Group has no targets related to water and marine resources, although it is committed to efficient use of water resources.

TRACKING THE EFFECTIVENESS OF POLICIES AND ACTIONS

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

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

Level of ambition and indicators used: Since the Group does not yet have a global action plan in this area, it has not defined the specific level of ambition with quantifiable targets and homogeneous measurement indicators. However, key opportunities have been identified, such as access to public-private funding for the implementation of projects to improve water management and water quality, which could help to boost the development of a more structured strategy in the future and define specific indicators to measure progress in this area in forthcoming years.

E3-4. WATER CONSUMPTION

***(28,29)**

Water consumption data for own operations

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

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

Note: This indicator has not been validated by an external body other than the verification provider for this Statement.
The water consumption by offices not owned by Ebro Foods, i.e. all leased offices, is excluded because it is negligible (withdrawal of less than 0.5% of the total in a worst-case scenario) and owing to the difficulty of obtaining data from the lessors. However, the data of the two offices owned by the Group (the office of Lustucru Premium Group in Lyon and the office of Transimpex in Lambsheim) are included.

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

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

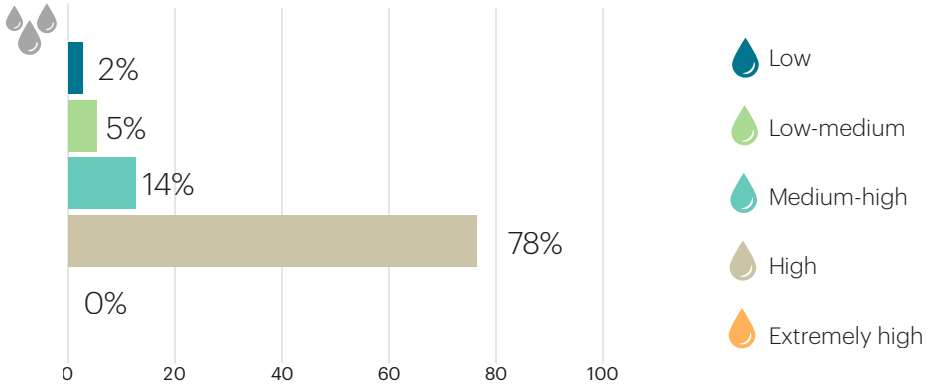
This indicator also includes the consumption of water by Agromeruan for farming its leased agricultural land. This is the only agricultural process performed by the Ebro Group.

It should also be noted that most of the water used by the Group for its industrial processes is obtained from municipal water supply networks (79%) and a small proportion is from wells (21%).

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

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

WATER CONSUMPTION IN AREAS AT RISK (M^3)	2025		2024	
Low	72,540	2%	69,532	2%
Low-medium	159,475	5%	263,288	8%
Medium-high	419,237	14%	528,983	16%
High	2,401,321	78%	2,347,437	72%
Extremely high	12,016	0%	35,569	1%



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

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

ESRS E4
Biodiversity and ecosystems

LIST OF IROS ASSOCIATED WITH E4

Impactos, Riesgos y Oportunidades

COD.	DESCRIPCIÓN	IMPACTO		CdV	HORIZONTE	POLÍTICAS ASOCIADAS AL IRO
		BIODIVERSIDAD				
IP-17	Creation of agricultural habitats with high ecological value (wetlands, habitats of protected species, etc.)	I+	**P**	Up	Medium term	Sustainability, Environmental and Corporate Social Responsibility Policy
IN-19	Land degradation and loss of soil properties as a result of intensive farming practices in the suppliers' sourcing areas.	I-	**P**	Up	Short term	Supplier Code of Conduct
R-12	Operating costs as a result of reduced agricultural production due to the loss of soil properties or high temperatures that diminish crop yield.	R	**A**	Up OO Dow	Short term	

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

KEY: Value Chain (VCh)
Ups: Upstream OO: Own Operations Dow: Downstream

SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

***(16b,c)**

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

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

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

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

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

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

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

IRO-1 DESCRIPTION OF PROCESSES TO IDENTIFY AND ASSESS MATERIAL BIODIVERSITY-RELATED IMPACTS, RISKS AND OPPORTUNITIES

***(17a-d,19)**

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

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

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

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

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

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

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

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

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

E4-1. TRANSITION PLAN AND CONSIDERATION OF BIODIVERSITY AND ECOSYSTEMS IN STRATEGY AND BUSINESS MODEL

***(13a)**

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

E4-2. POLICIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

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

SUSTAINABILITY, ENVIRONMENTAL AND CORPORATE SOCIAL RESPONSIBILITY POLICY	
MDR-P 65 (a)	**Contents:** Through this Policy, the Group makes sustainable growth the pillar of its business management strategy, undertaking commitments to its principal stakeholders, namely its professionals, shareholders, communities, public and environment. The environment-related principles, commitments, targets and strategy, especially those related to biodiversity, establish the undertaking to protect biodiversity. Oversight and monitoring fall within the remit of the Audit, Control and Sustainability Committee, which reports to the Board of Directors.
MDR-P 65 b-f)	See E1-2

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

- Contribution to direct impact drivers on biodiversity loss (climate change, land-use change, direct exploitation, invasive alien species, pollution, etc.)
- Impacts and dependencies on ecosystem services
- Traceability of products, components and raw materials with impacts on biodiversity
- Production, sourcing or consumption from ecosystems that are managed to maintain or enhance conditions for biodiversity
- Social consequences of biodiversity and ecosystems-related impacts
- Operational sites of the Ebro Group located near protected areas, as they were not identified as material in the Double Materiality Assessment
- Impacts on the state of species and impacts on the extension and state of ecosystems
- Material impacts related with biodiversity and ecosystems
- Dependencies, material physical and transitional risks and opportunities

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

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

E4-3. ACTIONS AND RESOURCES RELATED TO BIODIVERSITY AND ECOSYSTEMS

***(27)**

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

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

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

MDR-A: Action and resources related to biodiversity and ecosystems

ACTION	SCOPE	COMPANY	HORIZON	CAPEX (€ 000)	OPEX (€ 000)	CAPEX 2026 & later (€ 000)
Marine biodiversity protection programme		Bertagni	Short term	–	3	
TOTAL				**–**	**3**	

No future biodiversity actions are planned.

E4-4. TARGETS RELATED TO BIODIVERSITY

***(31)**

The Ebro Group has not established targets related to biodiversity.

TRACKING THE EFFECTIVENESS OF POLICIES AND ACTIONS

The Group does not have a structured, homogeneous, Group-level process to track the effectiveness of its biodiversity-related actions. Nor has a specific level of ambition been established, or a reference period to measure progress in this area. However, some of our subsidiaries have developed specific sustainable agriculture initiatives that may have a positive impact on biodiversity. Growers are monitored constantly through field visits and external audits (see E1-3).

In the future, the Group might consider developing a more systematic approach in this matter, analysing its impact on ecosystems in greater depth and establishing metrics to enable assessment of its contribution.