

ESRS E4

Biodiversity and ecosystems

LIST OF IROS ASSOCIATED WITH E4

Impactos, Riesgos y Oportunidades

CODE	DESCRIPTION	IMPACT		VC	TIME HORIZON	POLICIES ASSOCIATED WITH IRO
BIODIVERSITY						
IP-17	Creation of agricultural habitats with high ecological value (wetlands, habitats of protected species, etc.)	I+	P	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)	<p>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.</p> <p>The environment-related principles, commitments, targets and strategy, especially those related to biodiversity, establish the undertaking to protect biodiversity.</p> <p>Oversight and monitoring fall within the remit of the Audit, Control and Sustainability Committee, which reports to the Board of Directors.</p>
MDR-P 65 b-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	<p>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.</p> <p>It thus establishes the obligation of its providers and service providers to comply with applicable laws, regulations and standards.</p> <p>The Audit, Control and Sustainability Committee is responsible for monitoring and oversight, reporting to the Board of Directors.</p>
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.