ESRS E5
Resource use and circular economy

LIST OF IROS ASSOCIATED WITH E5

Impacts, Risks and Opportunities

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

IRO-1 DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL RESOURCE USE AND CIRCULAR ECONOMY-RELATED IMPACTS, RISKS AND OPPORTUNITIES

***(11)**

The process for identifying the IROs is described in ESRS 2 SBM 3 and IRO-1. In particular, for the impacts, risks and opportunities related to resource use and circular economy we considered: (i) the list of products and by-products of our principal production processes, (ii) the Group's Long-Term Sustainability Plan, "HEADING TOWARDS 2030", (iii) different external initiatives in which the Group participates, and (iv) sectoral best practice; and more specifically, information related to consumers and consumer habits (Kantar and Mintel panels, market information related to end-customers). The assets and sites of the Group and our value chain were assessed, although without an exhaustive assessment of particular issues and locations. We also used the historic information available on the raw materials and auxiliary material (packaging) used by the Group and the level of re-use or treatment of disposable items as an element of analysis.

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

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

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

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

E5-1. POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

***(14,15)**

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

However, this Policy does not directly address the IROs related to resource use and circular economy. Nor does it address the transitioning away from use of virgin resources or the sustainable sourcing and use of renewable resources. But the Group undertakes in the Policy to develop programmes and measures to boost circular economy and Zero Waste.

SUSTAINABILITY, ENVIRONMENTAL AND CORPORATE SOCIAL RESPONSIBILITY POLICY	
MDR-P 65 (a) **E5-1 14** **E5-1; 15** **E5-1; 16**	**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 resource use and circular economy, establish the undertaking to optimise their use and to prevent and minimise 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

E5-2. ACTIONS AND RESOURCES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

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

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

ACTIONS RELATED WITH OPTIMISATION OF THE USE OF BIOLOGICAL RESOURCES:

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

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

ACTIONS RELATED WITH WASTE MANAGEMENT AND CIRCULAR ECONOMY:

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

  With regard to meeting the reduction, recycling and re-use targets defined in the Packaging and Packaging Waste Act 11/97 of 24 April, our Spanish subsidiary Herba has joined Ecoembalajes España, S.A. (Ecoembes), which has the mission of designing and developing systems for selective collection and recovery of used packaging and packaging waste. Ecoembes uses the "Green Dot" (symbol that appears on the packaging) to show that the packager of the product has paid a sum of money for each package put on the market.

  Both the European rice companies and the head offices of Ebro Foods, S.A. have signed agreements with companies similar to Ecoembes for the destruction of paper and other data carriers. With these agreements, apart from complying with the Data Protection Act, they guarantee a sustainable management of the documentation through the undertaking by these companies to destroy and recycle the material.

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

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

MDR-A: Actions and resources related to resource use and circular economy

ACTION		SCOPE	COMPANY	HORIZON	CAPEX (€ 000)	OPEX (€ 000)	CAPEX 2026 & later (€ 000)
Waste reduction	Flour silo, recycling programme and improvement of processing - of flour that was previously discarded	OO	Ebro Frost Denmark	Short term	2		
Waste reduction	Improvement of processes, reuse of product and elimination of waste	OO	Tilda Ltd	Long term	397		445
Packaging reduction	Mykerinos project: new packaging solution to remove over-packaging for promotional products	OO Down	Lustucru Frais	Long term	220		455
Improved recyclability and plastic packaging	Changes in the composition of a non-recyclable triplex material (PET/PET/PP) to convert it to single-material (PP) with SIOX barrier, which is 100% recyclable by design (ready to be recycled)	OO Down	Herba Ricemills	Long term		2.7	4.5
				TOTAL	**619**	**3**	**905**

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

The investment indicated in the above table is part of the total investments made by the Group, disclosed in Note 9 to the accompanying consolidated annual accounts. This investment is at an initial stage and its execution will be completed during 2026, with an additional investment contemplated of approximately €1 million.

E5-3. TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

***(23,24,25)**

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

TARGETS RELATED TO WASTE MANAGEMENT
Zero waste. Progress towards circular economy by increasing the re-use and recovery of waste through avoidance and recovery practices.

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

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

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

The targets defined in the Long-Term Sustainability Plan "HEADING TOWARDS 2030" are related to the commitment established in the Group's policy to optimise the utilisation of resources and circular economy, and to avoid and minimise environmental impacts.

The targets have 2021 as their base year, and they are absolute and relative to the entire scope of the Group's own operations. The targets are defined at Group-level, without direct participation of the interested parties, and are defined using internal criteria of the Group.

2025	2021 (BASE YEAR)	VARIATION (T)	VARIATION (%)
24,184	38,247	(14,063)	(37)%

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

E5-4. RESOURCE INFLOWS

***(30,31,32)**

Our raw materials used are divided into two major categories:

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

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

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

OVERALL TOTAL WEIGHT OF PRODUCTS AND MATERIALS USED	2025		2024	
CATEGORY OF PRODUCT AND MATERIAL	WEIGHT (TONNES)	%	WEIGHT (TONNES)	%
Technical materials (packaging)	80,107	3%	77,253	3%
Biological materials (raw materials)	2,228,162	97%	2,339,714	97%
TOTAL	**2,308,268**		**2,416,966**	

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

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

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

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

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

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

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

To preserve and guarantee the utmost food safety of our products, the primary packaging, which is in direct contact with the food, must have a 100% virgin material composition or be certified as suitable for use in the food industry. In this scenario, almost all the primary packaging used in our Group is virgin fibre, with a minimal proportion of recycled fibres (2%).

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

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

RECYCLED FIBRE CONTENT	2025		2024	
Primary packaging	547	2%	710	2%
Secondary/tertiary packaging	23,101	50%	23,365	53%
TOTAL RECYCLED FIBRE	**23,648**	**30%**	**24,075**	32%

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

E5-5. RESOURCE OUTFLOWS

***(37,38,39,40)**

Most of the waste generated by our business is classified as non-hazardous waste, essentially the packaging of ingredients and auxiliary materials. There is also a small proportion of hazardous waste generation, mainly waste from the packaging of chemical products used in maintenance work at our facilities

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

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

75% of the waste generated is recovered.

WASTE DESTINATION	2025		2024	
Total Waste Disposed	9,129	25%	14,809	41%
Total Waste Recovered	28,019	75%	21,273	59%
TOTAL WASTE (TONNES)	**37,149**		**36,082**	

The total waste not recycled is 77%.

	2025		2024	
TOTAL WASTE NOT RECYCLED (TONNES)	28,450	77%	23,552	65%

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

NON-HAZARDOUS WASTE FOR DISPOSAL	2025		2024	
Landfill	5,830	16%	8,915	25%
Incineration	1,429	4%	1,783	5%
Other disposal operations	1,332	4%	3,677	10%
TOTAL NON-HAZARDOUS WASTE DISPOSED (TONNES)	**8,590**	**24%**	**14,375**	**40%**

HAZARDOUS WASTE FOR DISPOSAL	2025		2024	
Landfill	355	59%	355	77%
Incineration	12	2%	19	4%
Other disposal operations	172	29%	60	13%
TOTAL HAZARDOUS WASTE DISPOSED (TONNES)	**539**	**90%**	**433**	**94%**

NON-HAZARDOUS WASTE DEVIATED FROM DISPOSAL (RECOVERED)	2025		2024	
Recycled	8,674	24%	12,505	35%
Prepared for reuse	1,735	5%	107	0%
Other recovery operations	17,550	48%	8,633	24%
TOTAL NON-HAZARDOUS WASTE RECOVERED (TONNES)	**27,959**	**76%**	**21,246**	**60%**

HAZARDOUS WASTE DEVIATED FROM DISPOSAL (RECOVERED)	2025		2024	
Recycled	24	4%	24	5%
Prepared for reuse	15.52	3%	0	—
Other recovery operations	20.88	3%	3	1%
TOTAL HAZARDOUS WASTE RECOVERED (TONNES)	**61**	**10%**	**27**	**6%**

Note: The waste generated in all the offices (18) is excluded from the calculation of waste generated as it represents a negligent proportion of total waste generated.
Note: The data on the company Transimpex is not available, so it is excluded from the scope of reporting.
Note: This indicator has not been validated by an external body other than the verification provider for this Statement.

The Group does not generate any radioactive waste.

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

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

Most of the companies in our Group have contracted the management of hazardous and non-hazardous waste to authorised waste disposal contractors. All waste of whatever type is separated by kind and taken to authorised waste disposal contractors for treatment according to the laws in place in each geographical area, giving priority to recycling and re-use wherever possible.

The information on the quantity of waste management and final treatment received was obtained mostly (92%) from the waste management suppliers, who provide the information.