SUSTAINABILITY STATEMENT 2025

SAMMONTANA HOLDING S.P.A. BENEFIT CORPORATION

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General Disclosures

Basis for preparation

BP-1 – Basis for preparation of the sustainability statement

The Sustainability Statement of Sammontana Holding (hereinafter also the "Group" or "Sammontana") has been prepared consistently with the FY2025 consolidated financial statement of Sammontana Italia S.p.A. Società Benefit. As part of the Group's post-acquisition reorganization process, Sammontana Italia S.p.A. first merged by direct absorption Forno d'Asolo S.p.A. and its subsidiary SIPA S.p.A. Subsequently, Sammontana S.p.A. Società Benefit merged by reverse absorption its parent company, Sammontana Italia S.p.A., pursuant to Articles 2501-bis and following of the Italian Civil Code.

The Merger became legally and administratively effective retroactively as of January 1, 2025, and effective for tax and accounting purposes as of December 31, 2025. Following the Merger, Sammontana S.p.A. Società Benefit was renamed Sammontana Italia S.p.A. Società Benefit.

The reporting scope for the financial year 2025 includes:

- Sammontana Italia S.p.A. Società Benefit, in its new corporate structure, together with its foreign subsidiaries already operating within the scope, namely Forno e Più GmbH, Bononia SAS, Bindi Deutschland GmbH, Bindi North America Inc., Dessert de France SAS, Dakana Services SAS, Gelpat Tradition SAS and Les Experts Patissiers SAS, for the entire financial year 2025, as well as its Italian operating subsidiaries, Transfrigo S.r.l. and the newly incorporated Sammontana Italia Retail S.r.l. For the purposes of this Report, Sammontana Italia SB and all its direct and indirect subsidiaries are jointly referred to as the "Group" or "Sammontana Italia."
- La Rocca Creative Cakes Inc., from the 1st of April 2025, the date of its acquisition. Qualitative and quantitative information relating to La Rocca is collected for the reporting year, from the acquisition date.

The Group applies the reporting exemption[1] for Lizzi Srl, sold on the 28th of February 2025.

This Sustainability Statement has been prepared on a voluntary basis and adopts an approach consistent with EFRAG's draft simplified ESRS (European Sustainability Reporting Standards, hereinafter also simply referred to as the "ESRS") published on the 3rd of December 2025, pending adoption by the European Commission. As this is a first-time application, the reporting is not yet fully compliant with all ESRS provisions. This sustainability statement covers the undertaking's upstream and downstream value chain in the identification and assessment of impacts, risks and opportunities. The document describes the policies, actions, and targets relating to the value chain. As regards metrics concerning the value chain, the Group, where applicable and within the limits allowed by the standards, uses indirect data, proxies or partial coverage of the information scope.

[1] *ESRS 1, Paragraph 74:* If the undertaking acquires a subsidiary undertaking during the reporting period, it may defer the inclusion of that subsidiary undertaking in the materiality assessment and in the sustainability statement to the following reporting period. If a subsidiary undertaking leaves the group during the reporting period, it may adjust the scope of the materiality assessment and the reporting scope as from the beginning of the current reporting period.

BP-2 – Specific information if the undertaking uses phasing-in options

In compliance with the requests of Disclosure Requirement BP-2 of ESRS 2, the Group clarifies that information relating to material topics and sub-topics, including information concerning strategy, the business model, targets, policies, actions and metrics, is presented in the respective topical chapters of this Report, consistently with the ESRS structure.

Furthermore, with regards to the application of transitional provisions, the Group applies the phase-in measures provided for in paragraphs 125(a)–(e) of ESRS 1. In particular, the Group applies the phase-ins provided for: E1-11 "*Anticipated financial effects from material physical and transition risks and potential climate-related opportunities*", E2-5 "*Substances of concern and substances of very high concern*", and S1-13 "*Health and safety metrics*", with reference to non-employee workers for datapoints 36(b)–(e).

GOV-1 – The role of the administrative, management and supervisory bodies in relation to sustainability

The Board of Directors of the parent company, Sammontana Holding, plays a central role in defining strategic directions and overseeing economic, environmental, and social matters that are relevant to the company. The Board is composed of **nine members**, all of whom are non-independent, and the **female** component represents **11.11%** of the total[2]. The Board oversees the progress of sustainability projects and annually approves the Impact Report and the Voluntary Sustainability Statement, supported by the Sustainability Department (Head of Sustainability & Impact). Within this framework, management ensures the proper operational implementation of the approved strategies by coordinating the activities of the various departments. Meanwhile, second and third-level internal controls, including those exercised by the Board of Statutory Auditors, support transparency and compliance with regulations, voluntary standards, and corporate objectives, thereby contributing to responsible management and long-term value creation. Employee representatives do not participate in administrative, management, or control bodies; however, the Group ensures their involvement through the mechanisms provided by legislation and collective bargaining agreements, as described in chapter S1.

During the reporting period, the Board of Directors progressively enhanced its competencies and knowledge in sustainability, responsible governance, and ESG impact management, supported by a structured system of continuous dialogue and ongoing updates. The Board assesses the adequacy of the competencies available to manage and oversee sustainability strategies through:

- **the direct participation** of the CEO and the Chair of Sammontana Holding S.p.A. in the Sustainability Steering Committee, ensuring a continuous flow of information on emerging ESG topics, applicable standards and material risks/opportunities;
- **dedicated training initiatives for managers** and the CEO, including "B Day" sessions, aimed at exploring the principles of the Società Benefit model, B Corp standards, impact management and international ESG best practices;

2 At the moment, the Group has not adopted any additional diversity criteria to be considered in the composition of the Board of Directors.

- **Biannual Management Meetings** , attended by the CEO, the Chair of the Holding, certain investors and all management, for alignment on strategies and results, including an ESG focus;
- **Biannual Boost Meeting days**, strongly promoted by the CEO, who meets separately with the managers of the various departments, including Sustainability, to align them on strategy and jointly define the levers to overcome any departmental critical issues, stimulating growth and development drivers;
- **approval by the Board of Directors of the main corporate policies in the ESG area**, which helps consolidate a common vision on sustainability, risk management and shared value creation.

This set of activities enables the administrative and supervisory bodies to maintain an up-to-date level of knowledge with respect to regulatory developments, market standards and emerging ESG risks and opportunities.

Responsibility for managing and supporting the oversight of these matters, including related impacts, risks and opportunities, is assigned to the Head of Sustainability & Impact, the Sustainability Department, who is external to the Board and coordinates a team dedicated to the design of ESG initiatives and performance monitoring, providing ongoing support through technical analyses and periodic reporting. However, **approval of the Sustainability Statement and the Impact Report by the Board of Directors of the Holding** represents the formal moment of reporting and overall verification of ESG objectives and results, strengthening transparency, accountability of governance bodies and the continuous improvement of sustainability performance.

Strategic sustainability oversight is ensured by the **Sustainability Steering Committee**, the main ESG governance body, coordinated by the Head of Sustainability & Impact and composed of the CEO, investors (including the Chair of the Holding, Leonardo Bagnoli, and other members of the Bagnoli family) Investindustrial sustainability representatives and Directors of the main corporate departments (Top Management). The Committee does not delegate overall responsibility for overseeing material impacts, risks and opportunities and meets at least twice a year, while the Investors' Committee meets once a year with the sustainability team. Steering Committee meetings examine:

- assessment of material impacts, risks and opportunities in strategic decision-making processes;
- definition of related targets and monitoring thereof;
- oversight of the integration of ESG factors into corporate strategy;
- analysis of major corporate transactions: investments, mergers, acquisitions and development initiatives;
- management of the risk management process and related policies.

The Group's sustainability targets are defined through a structured and progressive process based on the analysis of material impacts, risks and opportunities and on continuous dialogue with corporate departments and governance bodies. This process includes:

- the involvement of the relevant Departments **through dedicated meetings and one-to-one working sessions**, aimed at translating ESG priorities into measurable operational objectives consistent with the industrial strategy;
- the integration of sustainability targets into the main planning and control tools, as well as into corporate policies subject to Board approval.

Progress against the defined targets is monitored through a periodic reporting system managed by the Sustainability Department, which provides the Steering Committee and corporate bodies with technical analyses, performance indicators and updates on the progress of initiatives. Achieved results and any deviations from targets are discussed during the periodic meetings of the governance bodies, including Sustainability Steering Committee and Executive Committee meetings, enabling any corrective actions to be assessed in a timely manner.

Finally, it should be noted that Sammontana Italia S.p.A. Società Benefit, the Group's operating subsidiary, integrates common benefit objectives into its decision-making processes. This approach is strengthened by the B Corp certification process, which introduces continuous comparison with international standards on impact management and shared value creation.

GOV-2 – Integration of sustainability-related performance in incentive schemes

The remuneration of the members of the Board of Directors of Sammontana Holding is determined by the Shareholders' Meeting and consists exclusively of a fixed component. During the reporting period, no variable incentive schemes linked to sustainability objectives are in place for members of the Board of Directors in their capacity as such.

Nonetheless, in 2025, a Management by Objectives (**MBO**) scheme was introduced, linking a portion of variable remuneration to the achievement of specific sustainability targets. This scheme applies to Top Management and the Head of Sustainability, who are members of the Sustainability Steering Committee. For these roles, **10% of the individual bonus** is contingent **upon meeting the eligibility requirements for B Corp certification for Sammontana Holding**, the parent company. The achievement of this objective is assessed based on the applicable certification standard and must be demonstrated through a **self-evaluation by December 2025**.

Specifically, the eligibility requirements are considered met upon the occurrence of two conditions:

- **under the previous B Impact Assessment standard – version 1.6** (valid until September 2025), by achieving an **Assessment score above 80 points**;
- **under the new B Corp standard – version 2 (v2),** applicable to companies undergoing audit from February 2026, by **meeting the minimum requirements set out in the certification scheme**, as defined in the recertification guidelines.

B Corp certification is considered a sustainability target as it:

- provides an external, independent assessment of the company's overall ESG performance, based on internationally recognized standards;
- requires continuous and measurable improvement in sustainability performance, with verifiable minimum thresholds for achieving and maintaining certification;

- promotes the adoption of policies, practices, and measurement systems that strengthen the Group's ability to manage its material impacts.

GOV-3 – Statement on due diligence

The application of the main aspects and steps of the due diligence process is illustrated in section **GOV-4 - *Risk management and internal controls over sustainability reporting***, of the Sustainability Statement, which provides a complete mapping of references to the paragraphs and pages where these elements are addressed.

Due diligence is embedded in governance, strategy and the business model through a dedicated structure involving the Board of Directors, the Sustainability Steering Committee and the Head of Sustainability & Impact, supported by policies, processes and tools designed to guide the identification, assessment and management of impacts, risks and opportunities across the entire value chain.

With regards to due diligence, the Group ensures continuous and structured stakeholder engagement through a **Stakeholder Engagement Policy**, based on updated mapping and multiple dialogue tools, including surveys, training meetings, audits, consultations with customers and suppliers, territorial initiatives, digital channels and reporting systems. The outcomes of these activities are considered in decision-making processes, in the double materiality assessment and in the definition of ESG targets.

Negative impacts on people and the environment are identified and assessed through the **double materiality assessment**, which considers the entire value chain by combining internal data, sector data, interviews with internal stakeholders and information from international standards and studies, as detailed in section **IRO-1**.

To address negative impacts, the Group adopts policies, programs and operational measures that include certified management systems, initiatives to reduce environmental impacts, responsible supply chain practices, safeguards for workers' safety and rights, remediation mechanisms and remediation channels. These actions are reported in the topical sections of the Sustainability Statement, including E1-3, E2-2, E3-2, E5-2, S1-4 and related ESRS references. The effectiveness of interventions is monitored through performance indicators, or KPIs, periodic audits and certified management systems, while results and progress are communicated annually in the Sustainability Statement and Impact Report, ensuring transparency regarding the measures implemented and progress against targets.

GOV-4 - Risk management and internal controls over sustainability reporting

The Group has implemented a **formalized and dedicated system of internal control and risk management over sustainability reporting**, designed to ensure the reliability, completeness, traceability and methodological consistency of ESG information across the entire relevant value chain.

The control and risk management system is integrated into the overall corporate governance framework and aligned with the Group's strategy and business model, which provides for coordinated management of operating activities and the related information flows. It is aimed at identifying, assessing and mitigating the **main sustainability reporting risks**, including risks relating to data quality, methodological consistency, completeness of information and compliance with applicable regulatory requirements.

The system is based on a **structured multi-level control model**, consistent with the *three lines of defense* principle, and distinguishes roles, responsibilities and controls:

- **First level of control**: operational contacts from the various organizational units, sites and production sites, who are responsible for collecting, recording and performing the initial verification of data within their area of responsibility, together with the respective department managers, who are responsible for aggregating, controlling and checking the consistency of data from the various operating units;
- **Second level of control**: entrusted to the specific sustainability department, one for social data and one for environmental data, as well as to the Head of Sustainability & Impact, who oversees the ESG reporting risk management system, coordinates the process of identifying and assessing risks, verifies the effectiveness of defined controls and supervises the correct application of reporting methodologies, approving the consolidated data intended for external disclosure;
- **Third level of control**: consisting of the Board of Directors, which acts as final supervisor by receiving and analyzing the consolidated information, assessing the main residual reporting risks and ensuring that the information reported is aligned with the Group's strategy, business model and value chain.

The system allows for a **structured risk management process**, organized into the following phases:

- identification of the main risks connected with sustainability reporting;
- assessment of the likelihood and impact of such risks on the quality and reliability of ESG information;
- definition and implementation of preventive and corrective controls to mitigate the identified risks;
- periodic monitoring of risks and control safeguards, with dedicated reporting flows to governance bodies.

In the absence of a single centralized IT tool to support the collection and consolidation of sustainability data, the reporting process, although structured and formalized, is not yet fully agile from an operational perspective and requires strengthened coordination and reconciliation of information flows in order to ensure data quality, traceability and consistency.

Nevertheless, through this system, the Group ensures continuous oversight of sustainability reporting risks and strengthens the reliability of the ESG information disclosed, consistently with its strategy, business model and responsible management of the value chain.

Strategy

SBM-1 – Strategy, business model and value chain

The Group operates in the food sector, with a significant position in the production and distribution of ice cream and frozen bakery products, serving both domestic and international markets. The Groups business model[3] is based on the selection and processing of food raw materials to produce ice cream, frozen bakery products and patisserie products distributed both nationally and internationally: ice cream, *sweet pastry,* patisserie *e viennoiserie* and frozen food products manufactured by co-packers or simply marketed under third-party labels.

Commercial distribution covers Italy and several European countries, including France, Germany, Austria, Switzerland and the United Kingdom, as well as non-EU markets such as the United States, Canada, Australia, China, Israel and Morocco. The Group mainly serves the Ho.Re.Ca. channel, including bars, restaurants, hotels and gelato shops, and the large-scale retail channel, which represent the most significant segments in terms of volumes and market presence.

From 2025, with the acquisition of **La Rocca Creative Cakes Inc**. and the establishment of the holding companies **Sammontana North America Inc**. and **Sammontana Canada Holding Inc**., the Group's presence in the North American market has been further strengthened, expanding its geographical exposure and the strategic importance of the area.

Sammontana's **own operations** include the stages of product development and design, preparation of doughs and mixtures, processing, freezing, packaging, quality control and storage of finished products. Commercial activities include order collection, production planning, marketing, promotion, logistics and transport, supported by corporate departments such as HR, Finance, IT and Marketing.

The **main inputs** of the business model include agricultural raw materials (such as milk, sugar, cocoa and cereals), packaging materials, energy, water and human capital. Outputs consist of food products intended for final consumption, while outcomes include environmental impacts, (such as natural resource consumption), emissions and waste management, and social impacts, such as employment, food safety and relationships with consumers and communities. The Group assesses the resilience of its business model in relation to the main ESG risks, including the availability of natural resources (particularly water and agricultural raw materials), supply chain stability, the evolution of environmental and food regulations, and consumer expectations. In this context, the model is progressively adapted to integrate sustainability criteria into decision-making and operational processes. The upstream value chain includes suppliers organized into three tiers:

- **Tier 3+**: actors that extract or cultivate primary resources, such as farms, breeders and the extractive industry;
- **Tier 2**: entities that transform raw materials into semi-finished products, including food ingredients, packaging materials and industrial components;
- **Tier 1**: the Group's direct suppliers, providing ingredients, packaging, machinery, energy and services.

[3] Pursuant to *paragraph 20(d) of ESRS 2 SBM-1*, the Group declares that it is not active in any of the sectors identified by the standard as particularly sensitive. Specifically, the Group does not operate in the fossil fuels sector, including coal, oil, and gas, nor in chemical production relevant under Division 20.2 of the NACE classification. Furthermore, Sammontana is not involved in the production of controversial weapons, such as anti-personnel mines, cluster munitions, or chemical and biological weapons, nor in the cultivation or production of tobacco

The upstream phases are particularly relevant from an ESG perspective, as they are associated with potential impacts relating to the use of natural resources, working conditions and respect for human rights across the supply chain.

The downstream value chain includes:

- **Tier 1**: distribution and logistics of products through large-scale retail and the Ho.Re.Ca. channel;
- **Tier 2**: final consumption by consumers;
- **Tier 3**: end-of-life management, including disposal of food residues and management of packaging through collection, recycling or energy recovery.

The downstream phases are relevant in relation to impacts on consumers, including food safety, transparency and marketing, and environmental aspects connected with packaging.

The **Group's purpose is: "Il Sorriso che Nutre il Futuro delle Nuove Generazioni"** ("*The Smile that Nourishes the Future of New Generations*"). It represents the guiding principle that steers strategic choices, the business model and the way the undertaking creates long-term value, expressing the intention to generate growth responsibly towards people, society and the environment.

Starting from this purpose, the Group has defined a **sustainability strategy structured around three pillars**, which constitutes the reference framework for integrating ESG topics into decision-making and operational processes. The three pillars give rise to the five common benefit goals[4], which make explicit the Group's statutory commitment and translate its values into goals that can be verified over time. The approach adopted enables the Group to guide strategic decisions according to ESG priorities; strengthen the resilience of the business model; contribute to the sustainable development of the territories and communities in which it operates.

The three strategic directions are:

1. **Health and well-being**

The first pillar places health, food safety and people's well-being at the centre, including both consumers and workers. The Group is committed to ensuring safe, high-quality products, promoting responsible practices across the value chain and strengthening a corporate culture oriented towards care, quality and responsibility. This pillar provides for:

- promoting an industrial and commercial approach that takes account of the social impacts generated by the Group's activities;
- ensuring that development, innovation and market choices are consistent with principles of responsibility, fairness and attention to the needs of consumers and workers;

[4] The five common benefit purposes are described in detail in the Articles of Association of Sammontana Italia Società Benefit and are as follows: 1. To create **high-quality food products**; 2. To contribute to the **growth and enhancement of the community**; 3. To adopt **responsible models of production, distribution, trade, and commercial intermediation**; 4. To **promote interdependence within the ecosystem** in which the Company operates; 5. To progressively evolve its business and operating model towards a **zero greenhouse gas emissions economy**.

- strengthening a corporate culture based on care, reliability and quality as an essential lever for creating shared long-term value.

Common benefit goals 1 and 2 represent the operational activities of this pillar.

2. **Sustainable supply chains**

The second pillar recognizes the centrality of the value chain in creating sustainable value. From this perspective, the pillar provides for:

- developing and overseeing **responsible, transparent supply chain relationships oriented towards continuous improvement**, enhancing collaboration as a lever for generating shared value;
- promoting a systemic approach to sustainability that considers the environmental, social and economic impacts of activities throughout the entire life cycle of products and services;
- strengthening the resilience and reliability of the value chain, encouraging practices consistent with the principles of legality, fairness, respect for people and protection of resources.

Common benefit goals 3 and 4 represent the operational activities of this pillar.

3. **Environment**

The third pillar concerns the responsible management of environmental impacts and the transition towards sustainable models. From this perspective, the pillar provides for:

- integrating environmental considerations into strategic, decision-making and industrial processes, recognizing climate change and responsible resource use as key risk and opportunity factors;
- progressively reducing the environmental impacts of the Group's activities throughout the entire life cycle of products, through an approach based on efficiency, innovation and continuous improvement;
- contributing responsibly to long-term environmental and climate protection objectives, strengthening the resilience of the Group and its value chain in relation to global environmental challenges.

Common benefit goal 5 represents the operational activities of this pillar.

SBM-2 – Interests and views of stakeholders

The main stakeholders identified by Sammontana during the 2025 financial year include:

- shareholders and lenders;
- nature;
- future generations;
- own workforce;
- customers and end users;
- suppliers;
- governmental organizations;

- universities and research centers;
- local communities;
- other relevant stakeholders, including control bodies, certification bodies and associations.

During 2023, the Group carried out a structured **stakeholder engagement process through an online questionnaire**, aimed at collecting assessments on a set of sustainability topics relevant to the undertaking, organized into four macro-categories: economic, governance, environmental and social. The outcomes of the consultation provided significant input to the **double materiality assessment** carried out in 2024, particularly in the identification and assessment of impacts.

For 2025 sustainability reporting campaign, the Group did not carry out a new direct stakeholder engagement process, also considering the ongoing revision of the ESRS reporting standards and the organizational developments following the corporate merger. However, in preparation for future consultation activities, a **Stakeholder Engagement Policy** was defined, formalizing a continuous, transparent and inclusive approach based on updated stakeholder mapping and the use of differentiated listening tools, including internal surveys, training meetings, audits, consultations with customers and suppliers, territorial initiatives, digital channels, institutional roundtables and reporting systems. This policy establishes the principles and methods through which the Group intends to manage, starting in 2026, a new structured stakeholder engagement process.

The input collected will be integrated into decision-making processes and the main sustainability governance safeguards, including the double materiality assessment, strategic planning and the definition of ESG targets, under the coordination of the Sustainability Department and with the involvement of the relevant corporate departments.

The administrative, management and supervisory bodies are informed of the views and interests of key stakeholders through the presentation and validation of the main reporting documents. The **Sustainability Statement** and other ESG reporting are submitted for review and validation by the **Board of Directors** and the **Boards of Statutory Auditors**, ensuring that the outcomes of stakeholder dialogue and materiality analyses are fully considered within oversight and strategic direction processes.

SBM-3 – Interaction of material impacts risks and opportunities with strategy and business model, and financial effects

Sammontana's **production processes** generate inherent environmental impacts. The production of ice cream and frozen bakery products involves intensive use of energy, water, natural resources and packaging materials. In particular, refrigeration, which is essential for product preservation, represents one of the main sources of energy consumption and greenhouse gas emissions.

The use of materials is also associated with waste generation, both upstream, (during raw material sourcing), and downstream, (through post-consumer packaging and unsold products). The value chain in the food sector, especially with regards to agricultural raw materials, is linked to significant environmental impacts, including biodiversity loss, soil and water pollution, as well as social issues connected with working conditions and community rights in countries of origin.

From a social perspective, Sammontana, as an employer of a significant number of people, has a responsibility to manage human resources fairly and sustainably, promoting workers' well-being and preventing potential negative impacts related to employment conditions. In this area, the Group has launched initiatives aimed at professional development and the improvement of working conditions.

Lastly, it is also important to consider potential negative impacts connected with marketing practices and the indulgent nature of the products, in relation to consumer health and well-being.

Below is a **summary table of the topics and sub-topics identified as material** during the double materiality assessment, including their positioning along the value chain. It should be noted that, at the beginning of each thematic chapter, tables are provided outlining the respective impacts, risks, and opportunities (IROs) that were identified as material in the double materiality assessment conducted during the previous reporting period. For a detailed description of the impact analysis, as well as of the current and prospective financial effects of material risks and opportunities, and their evolution over the short, medium, and long term, please refer to the description of the assessment process presented in paragraph IRO-1.

No changes have been recorded in the material impacts, risks, and opportunities compared to the previous period (FY2024). All relevant aspects have been considered and are subject to the disclosure requirements set out by the ESRS standards. *Table 1. Relevant topics and subtopics*

Topic	Sub-Topic	Value Chain Position
E1 – Climate change	Climate change mitigation	Upstream – Own operations – Downstream
	Climate change adaptation	Upstream – Own Operations – Downstream
	Energy	Own Operations
E2 - Pollution	Pollution of air	Upstream
	Pollution of water	Upstream
	Pollution of soil	Upstream
	Substances of concern, including substances of extremely high concern	Own operations
	Microplastics	Downstream
E3 – Water	Water use	Upstream – Own operations
E4 – Biodiversity and ecosystems	Direct drivers of biodiversity loss (e.g. land-use change, climate change, pollution, invasive species)	Upstream
	Impacts on species	Upstream
E5 – Circular economy and resource use	Resource inflows	Upstream – Own operations
	Resource outflows	Own operations
	Waste management and circularity	Upstream – own operations – Downstream
S1 – Own workforce	- Working conditions (employment, wages, working time, H&S, social dialogue)	Own operations
	Equal treatment & opportunities (diversity, gender equality, training)	Own operations

	Other work-related rights (child labour, forced labour, privacy)	Own operations
S2 – Workers in the value chain	Working conditions (employment, wages, working time, H&S, social dialogue)	Upstream – Downstream
		Upstream – Downstream
		Upstream – Downstream
	Equal treatment & opportunities (diversity, gender equality, training)	Upstream – Downstream
	Other work-related rights (child labour, forced labour, privacy)	Upstream
S3 – Affected communities	Economic, social and cultural rights	Upstream – Own operations
S4 – Consumers and end users	Access to information	Own operations
	Data protection & privacy	Own operations
	Responsible marketing	Own operations
G1 – Business conduct	Anti-corruption and anti-bribery	Upstream – Own operations
	Supplier relationships (including payment practices)	Own operations

To handle the management of the relevant IROs, the Group has identified and adopted **a set of policies and procedures** aimed at managing its material sustainability matters, material impacts, risks and opportunities across its own operations and value chain. The following policies form part of the Group's sustainability management system.

Below is the full list of policies and procedures governing the management of ESG topics. Unless otherwise specified, the policies or procedures listed below apply to the Group as a whole.

- **Articles of Association of a Benefit Corporation**[5]

It formally embeds the common benefit goals, making explicit the commitment to operate by jointly pursuing economic performance and the creation of environmental and social values. It guides governance and the business model toward the responsible management of impacts across the entire value chain, including consumers, workers, communities, the supply chain, and the environment.

References[6]: Benefit Corporation Register and Assobenefit Guidelines

Considerations of affected stakeholders: The common benefit goals are the result of a structured stakeholder consultation process, based on the analysis of the three sustainability pillars (internally) and on the definition of the purpose (both internally and externally). Therefore, although no specific consultations were conducted for the drafting of the articles of association

[5] The Benefit Corporation status currently refers to Sammontana Italia Società Benefit SpA., which, as the Group's operating subsidiary, concentrates the main industrial and commercial activities. Sammontana Holding SpA, the parent company, has initiated the process of amending its bylaws and plans to adopt the Benefit Corporation status starting from the 2026 financial year.

[6] If the policy refers to third-party standards or initiatives that the company commits to comply with through the implementation of the policy, a reference to the relevant third-party standard or initiative.

of Sammontana Italia SB or Sammontana Holding, the overall outcomes of past engagement activities have contributed to shaping the current statutory commitment.

For further details, refer to G-1.

- **Sustainability Policy**

The Sustainability Policy defines the principles and commitments guiding the Group in integrating environmental, social and economic sustainability across all activities, sites and processes. The policy guides decisions towards responsible value creation, promoting strategic consistency and continuous improvement of ESG performance. The strategy is structured around three pillars: promoting health and well-being through safe, high-quality products attentive to nutritional needs; building a responsible supply chain that prioritizes ethical practices and sustainable sourcing criteria; reducing environmental impact through efficient resource management, emissions reduction, adoption of circular models and use of lower-impact production and distribution solutions. The policy is translated into concrete actions, monitored through key indicators and periodic assessment processes, and guides the corporate culture towards responsibility, transparency, and sustainable innovation.

References: Agenda 2030 of the United Nations – SDGs, Green Deal Europeo, Strategy EU Farm to Fork, *Legge 208/2015* on the Benefit Corporations, B Impact Assessment (BIA) and related benchmarks.

Consideration of affected stakeholders: stakeholder interests are considered through past stakeholder engagement activities that helped guide the policy commitments. Although no specific consultations were conducted for the policy, the general outcomes of previous engagement activities guide strategic updates to ESG policies, with a new engagement cycle planned for 2026.

For further details, refer to E1-4, E2-1, E3-1, E4-2, E5-1 and S1-1.

- **Stakeholder Engagement Policy**

The stakeholder engagement policy defines the principles and methods through which the Group identifies and engages its stakeholders, promoting continuous, transparent, and inclusive dialogue across all Group Departments and processes. The policy establishes a structured approach to stakeholder mapping, based on the analysis of impacts, level of influence, and information needs, and guides engagement through differentiated tools for each category: employees, clients, consumers, suppliers, communities, institutions, media, and other stakeholders. Information gathered through stakeholder engagement (via surveys, consultations, audits, meetings, and digital channels) is integrated into materiality analysis activities, strategic planning, corporate improvement plans, and decision-making processes, thereby contributing to aligning the Group's policies and initiatives with the expectations and priorities identified. The policy also mechanisms for periodic monitoring and review to ensure the effectiveness and continuous evolution of the engagement model.

The policies included in the statement are the result of a comprehensive stakeholder consultation process, which initially led to the definition of the Group's strategy and identity purpose, and subsequently to the identification of the five specific benefit purposes of the Benefit Corporation.

Stakeholder engagement took place through specific consultation boundaries dedicated to:

- definition of the sustainability pillars, for the purpose of defining the Group strategy;
- impact materiality assessment;
- definition of the purpose;
- identification of entities receiving financial donations;
- Justice, Equity, Diversity and Inclusion surveys in 2024 and 2025.

References: B Corp.

Consideration of affected stakeholders: stakeholder interests are considered through past stakeholder engagement activities that helped guide the policy commitments. Although no specific consultations were conducted for the policy, the general outcomes of previous engagement activities guide strategic updates to ESG policies, with a new engagement cycle planned for 2026.

For further details, refer to S1-1, S2-1 and S3-1.

- **Environmental Policy**

The Environmental Policy defines the undertaking's commitment to minimizing the environmental impact of its activities, in line with ESG objectives. It establishes a structured approach to environmental management, based on compliance with applicable regulations, pollution prevention, staff training and the adoption of technical tools such as life cycle assessment and Ecodesign to guide more sustainable production and packaging choices. The Group is committed to the continuous improvement of its environmental performance through specific objectives relating to water and energy consumption, emissions reduction, optimization of discharges and responsible waste management, including waste recovery.

References: ISO 14001; Life Cycle Assessment methodology; B Corp.

For further details, refer to E1-4, E2-1, E3-1 and E5-1.

- **No Deforestation Policy**

The No Deforestation Policy formalizes the Group's commitment to ensuring that raw materials placed on the market or exported that fall within the scope of Regulation (EU) 2023/1115[7] are obtained without causing deforestation or forest degradation and in full compliance with the regulations of the country of origin. The policy defines operational principles and processes to prevent and mitigate risks across the supply chain, including data collection and verification, full supplier traceability, preliminary assessments and specific controls on each batch or transaction. The undertaking applies a structured due diligence system covering the entire process, from identification of products at risk to requests for information from suppliers, verification of requirements, completion of mandatory declarations and management of any violations through dedicated channels. The scope of these traceability mechanisms is currently limited to raw materials covered by the EUDR regulation.

References: Regulation (EU) 2023/1115, EUDR.

For further details, refer to E1-4 and E4-2.

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[7] According to the Regulation, raw materials are those derived from cattle, cocoa, coffee, palm oil, rubber, soybeans and wood. For the Group, this has repercussions on some raw materials purchased; purchased finished products and marketed finished products; packages purchased to produce the finished product.

- **Health and Safety Policy**[8]

The Health and Safety Policy highlights the Group's commitment to protecting the well-being of workers and all people operating at its sites, placing prevention at the center of corporate activities. The policy defines a structured approach to risk management, based on precise identification and assessment of hazards, continuous process monitoring, periodic staff training and the adoption of measures aimed at eliminating or reducing incidents, injuries and occupational diseases. It also promotes a shared safety culture based on active worker participation, transparent communication and coordination among all corporate departments and external undertakings. The Group ensures adequate resources for the continuous improvement of its performance, developing prevention plans, emergency management and operational programs aimed at ensuring a safe, responsible and respectful working environment.

References: ISO 45001 and Legislative Decree 81/2008.

Consideration of affected stakeholders: the policy provides for the active involvement of relevant stakeholders, particularly workers, suppliers, contractors, competent authorities and the local community, in the management of occupational health and safety topics. The document establishes structured consultation and participation methods for workers, including through their safety representatives, and promotes transparent and two-way communication aimed at collecting reports, requests and contributions from interested parties.

For further details, refer to S1-1.

- **Human Rights Policy**

The Human Rights Policy affirms the Group's commitment to protecting and promoting fundamental rights across all its activities and value chain, ensuring fair working conditions that respect the people involved. It therefore applies not only to employees and collaborators, but also to suppliers, business partners, contractors, local communities and individuals potentially affected by the Group's activities and products. The policy defines key principles such as: prevention of all forms of exploitation, child labour or forced labour, human trafficking, discrimination and harassment; protection of workers' health and safety; respect for privacy and personal data; promotion of equity, inclusion and freedom of association; attention to communities potentially affected by corporate activities. It also establishes clear expectations for suppliers and business partners, inviting them to monitor and manage human rights risks and to cooperate in audit, control and remediation processes, with a view to responsible, transparent management focused on preventing negative impacts across supply chains.

References: UN Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, ILO Fundamental Conventions, UN Convention on the Rights of the Child.

Consideration of affected stakeholders: the policy promotes constructive and continuous dialogue with stakeholders, aimed at identifying, preventing, mitigating and remediating potential negative human rights impacts, including through due diligence processes, audits, monitoring and reporting mechanisms. Stakeholder feedback is also taken into account in the periodic review of the policy and in reporting on human rights activities and results, contributing to an approach oriented towards continuous improvement.

For further details, refer to S1-1, S2-1 and S3-1.

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[8] Applies to Sammontana Italia SpA Benefit Corporation level.

- **Diversity, Equity and Inclusion Policy**

The Diversity, Equity and Inclusion Policy affirms the Group's commitment to valuing individual differences and promoting an open, respectful and inclusive working environment in which every person can express their potential. The policy recognizes three dimensions of diversity — internal, external and organizational — and aims to create a context that fosters acceptance, collaboration and development based on merit and talent. Through dedicated initiatives and the support of a DE&I Committee, the Group promotes inclusive behaviors, leadership attentive to people's well-being and growth opportunities for all resources, encouraging a corporate culture in which plurality of identities, experiences and perspectives represents a strategic lever for continuous improvement.

References: ICC Advertising and Marketing Communications Code 2018; Consumer Code, Legislative Decree 206/2005 and Legislative Decree 145/2007; Protection of minors in communication, Authority for Children and Adolescents, 2017; IAP Regulation on commercial communication for food and beverages to protect children, 2021; IAP Digital Chart Regulation; Legislative Decree 30/2026.

Consideration of affected stakeholders: stakeholder interests are considered through past stakeholder engagement activities that helped guide the policy commitments. Although no specific consultations were conducted for the policy, the general outcomes of previous engagement activities guide strategic updates to ESG policies, with a new engagement cycle planned for 2026.

For further details, refer to S1-1.

- **Quality and Food Safety Policy**

The Quality and Food Safety Policy expresses the undertaking's commitment to ensuring safe, high-quality and consistently reliable products across the entire supply chain, from farm to fork. The policy enhances production tradition and technological innovation, promoting the prevention of physical, chemical, biological and fraud risks, the adoption of good hygiene practices and full regulatory compliance. The corporate approach is based on a structured control and continuous improvement system, including verification plans across the entire production process, accurate information for consumers and targeted activities to strengthen the culture of quality through training, engagement and skills development of personnel. Quality is also pursued through responsible relationships with suppliers, periodic controls and preventive actions aimed at ensuring product safety and authenticity, while also promoting innovation, reliability and customer satisfaction.

References: GFSI, Global Food Safety Initiative; IFS, International Featured Standards; BRC, British Retail Consortium; AIC Crossed Grain Trademark for coeliac products; Organic; Vegan certifications; RSPO sustainable palm oil; Rainforest Alliance; Fairtrade; CTM cocoa; Halal; Kosher.

Consideration of affected stakeholders: stakeholder interests are considered through past stakeholder engagement activities that helped guide the policy commitments. Although no specific consultations were conducted for the policy, the general outcomes of previous engagement activities guide strategic updates to ESG policies, with a new engagement cycle planned for 2026.

The policy recognizes the involvement of relevant stakeholders as a key factor in ensuring high quality standards and product safety across the entire supply chain. Particular attention is paid to customers and consumers through satisfaction of their needs, loyalty and correct information via clear and complete labelling systems.

A central role is also attributed to suppliers and supply chain partners, considered key actors in the preventive safeguarding of quality and involved through inspections, controls and continuous improvement activities. Finally, the policy values the contribution of the Group's people, promoting training, information and engagement at all organizational levels, as well as collaboration with universities and academic institutions in support of innovation, the dissemination of a culture of quality and continuous performance improvement.

For further details, refer to S4-1.

- **Anti-Corruption Code**

The Anti-Corruption Code defines rules of conduct and operational safeguards aimed at preventing and combating all forms of corruption, both in relations with Public Administration and between private parties. The document strengthens and develops, from an anti-corruption perspective, the principles already contained in the Code of Ethics and the 231 Model, adopting a zero-tolerance approach to corrupt practices, facilitation payments and conduct capable of generating undue advantages. The objective is to ensure regulatory compliance, transparency of operations and awareness among recipients regarding individual and corporate responsibilities.

References: United Nations Convention against Corruption of 2003, the Merida Convention; OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997; Council of Europe Criminal Law Convention on Corruption, 1999; Italian Criminal Code, articles 317 et seq.; national anti-corruption legislation; Organization, Management and Control Model pursuant to Legislative Decree 231/2001; applicable anti-money laundering legislation; Legislative Decree 24/2023 on whistleblowing.

Consideration of affected stakeholders: Stakeholder interests are considered through past stakeholder engagements that have helped guide policy commitments. While policy-specific consultations have not been conducted, the overall results of past engagements guide strategic updates to ESG policies, with a new engagement cycle expected in 2026.

For further information, refer to S4-1, G1-1.

- **Whistleblowing Procedure**

The Whistleblowing Procedure governs the internal reporting system adopted for the management of reports concerning breaches of law, the Code of Ethics, the 231 Model and other relevant provisions. The procedure defines scope of application, methods for submitting reports, investigation processes, information flows and protective measures, guaranteeing confidentiality of the whistleblower's identity and protection against retaliatory acts. The objective is to encourage the timely emergence of unlawful or irregular conduct, strengthening the governance, internal control and compliance system.

References: Legislative Decree 24/2023; Directive (EU) 2019/1937; Legislative Decree 231/2001; Regulation (EU) 2016/679, GDPR; Legislative Decree 196/2003 and Legislative Decree 101/2018; ANAC Guidelines, Resolutions no. 311/2023 and no. 478/2025; Confindustria guidelines on whistleblowing for private entities.

Consideration of affected stakeholders: stakeholder interests are considered through past stakeholder engagement activities that helped guide the policy commitments. Although no specific consultations were conducted for the policy, the general outcomes of previous engagement activities guide strategic updates to ESG policies, with a new engagement cycle planned for 2026.

For further details, refer to S1-1 and G1-1.

- **Ethical Marketing Policy**

The Ethical Marketing Policy defines the principles and commitments that guide communication and marketing activities towards responsible, transparent and non-misleading practices, consistently with the Group's ethical values and the role of brands in influencing consumer behavior. The policy pays particular attention to the accuracy of information, consumer protection, protection of minors and prevention of greenwashing. Commitments include accurate representation of product characteristics, scientific support for nutritional and environmental claims, respect for human dignity and the promotion of informed consumer choices, without encouraging incorrect or excessive eating behaviors.

References: ICC Code on advertising communication; Consumer Code; documents of the Italian Advertising Self-Regulatory Institute, IAP; Directive (EU) 2024/825.

Consideration of affected stakeholders: stakeholder interests are considered through past stakeholder engagement activities that helped guide the policy commitments. Although no specific consultations were conducted for the policy, the general outcomes of previous engagement activities guide strategic updates to ESG policies, with a new engagement cycle planned for 2026.

For further details, refer to S4-1.

- **Supplier Code of Conduct**

The Supplier Code of Conduct translates the integration of environmental and social topics within the Group's business model across the value chain. The document is based on the principle of interdependence and shared responsibility, extending the Group's commitments to suppliers in the areas of human rights protection, fair and safe working conditions, people's health and safety, environmental protection and product quality and safety. In the environmental area, the Code promotes mitigation of climate impacts, responsible use of natural resources, waste reduction, biodiversity protection and adoption of practices oriented towards the circular economy. Through minimum requirements and advanced practices, the document supports a path of continuous improvement in environmental and social performance across the supply chain, contributing to the creation of shared value for workers, communities and the environment.

References: International Labour Organization, ILO; UN Guiding Principles on Business and Human Rights; UN Global Compact; OECD Guidelines for Multinational Enterprises; standards and references relating to food safety, environmental management, biodiversity, animal welfare, climate change and Life Cycle Assessment.

Consideration of affected stakeholders: applicable to policies relating to social topics: in drafting the Code, the views of supply chain stakeholders were considered through a co-creation approach involving direct engagement of a sample of suppliers during the drafting phase. The Code recognizes the central role of workers, local communities, customers and business partners as relevant stakeholders and promotes forms of collaboration, dialogue and joint improvement, including through reporting, monitoring and audit systems.

For further details, refer to S2-1.

- **Code of Ethics**[9]

The Code of Ethics defines the founding values and principles of conduct that guide business activities and corporate decisions, integrating compliance with applicable law with high ethical standards in the conduct of business. The Code is disseminated and applied to all recipients, including employees, collaborators and relevant third parties. The document promotes legality, integrity, fairness, transparency, protection of people's rights and social responsibility, serving as a reference for all recipients in carrying out corporate activities. The Code is an integral part of the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 and is aimed at preventing unlawful conduct, protecting corporate reputation and creating long-term sustainable value.

References: Legislative Decree 231/2001; Confindustria Guidelines for Organizational Models, updated June 2021; Legislative Decree 81/2008, article 30 on occupational health and safety; Regulation (EU) 2016/679, GDPR; Legislative Decree 196/2003 and Legislative Decree 101/2018; applicable national and international legislation in the countries where the Group operates..

Considerations on affected stakeholders: Stakeholder interests are taken into account through past stakeholder engagement activities, which have contributed to shaping the commitments set out in the policy. Although no specific consultations were conducted for the purpose of the policy, the overall outcomes of previous engagement activities inform the strategic updates of ESG policies, with a new engagement cycle planned for 2026.

For further details, refer to G1-1.

- **Sustainable Procurement Policy**

The Sustainable Procurement Policy defines the principles, commitments and operational methods guiding procurement decisions across the entire supply chain, in Italy and in the countries where the Group operates. The policy aims to integrate environmental, social and ethical criteria into supplier selection, qualification and monitoring processes, promoting transparency, traceability and responsibility along the supply chain. Its main objectives include reducing environmental impacts, particularly along Scope 3, respecting human rights and working conditions, promoting decarbonisation and continuously improving sustainability performance through structured collaboration with supply partners.

References: ISCC PLUS for almond and wheat supply chains; RSPO for palm-derived oils and fats; Rainforest Alliance; Fairtrade; Organic; FSC; PEFC; ISCC PLUS BIOCIRCULAR for packaging.

For further details, refer to G1-1.

- **Organization, Management and Control Model (MOG) 231**[10]

The Organization, Management and Control Model adopted by the Group aims to prevent the commission of offences relevant under Legislative Decree 231/2001 through a structured and integrated system of principles, rules of conduct, procedures and control protocols. The Model

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[9] Applies to Sammontana Italia SpA Società Benefit level – extension to Sammontana Holding expected in 2026.
[10] Applies to Sammontana Italia SpA Società Benefit level – harmonization expected in 2026.

identifies corporate activities exposed to the risk of offences, defines control safeguards and responsibilities, and introduces monitoring mechanisms, information flows and a disciplinary system, to promote conduct compliant with the principles of legality, fairness and transparency in carrying out corporate activities.

References: Legislative Decree 231/2001; Criminal Code and Civil Code, with reference to predicate offences recalled by the Decree; Legislative Decree 24/2023 on whistleblowing; Confindustria Guidelines for the construction of organization, management and control models pursuant to Legislative Decree 231/2001; occupational health and safety legislation, article 25-septies of Legislative Decree 231/2001; environmental legislation, with reference to environmental offences under article 25-undecies of Legislative Decree 231/2001, including references to Legislative Decree 152/2006.

Consideration of affected stakeholders: stakeholder interests are considered through past stakeholder engagement activities that helped guide the policy commitments. Although no specific consultations were conducted for the policy, the general outcomes of previous engagement activities guide strategic updates to ESG policies, with a new engagement cycle planned for 2026.

For further details, refer to G1-1.

- **External Social Media Policy**

The External Social Media Policy defines the purposes, types of content and rules of conduct applicable to the Group's official social media pages and profiles.

The policy governs the use of digital platforms with the objective of ensuring correct, transparent and respectful communication, fostering information on brands, products and corporate initiatives, as well as dialogue with users. The document also establishes content publication methods, rules for moderating interactions and criteria applied in collaborations with influencers, celebrities and bloggers.

References: UN Guiding Principles on Business and Human Rights; OECD Guidelines; AGCM regulations.

Consideration of affected stakeholders: stakeholder interests are considered through past stakeholder engagement activities that helped guide the policy commitments. Although no specific consultations were conducted for the policy, the general outcomes of previous engagement activities guide strategic updates to ESG policies, with a new engagement cycle planned for 2026.

For further details, refer to S4-1.

Management of impacts, risks and opportunities

IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported

For 2025, the Sammontana Group considered the double materiality assessment carried out for the first consolidated reporting of the new scope for 2024 to remain valid and current.

The process had been launched with an analysis of the external context, aimed at identifying the macrotrends relevant to the sector in which the Group operates. The regulatory framework, macroeconomic and scientific factors, peer best practices and sector standards were examined. The analysis was supplemented by an assessment of the Group's internal dimension, through interviews and document analysis, to understand dynamics relating to resources, processes, people and products.

The process covered the Group's main activities (development, production, sales and support functions) and mapped the entire value chain:

- upstream to tier 3+;
- downstream to the final consumer and product end-of-life.

The geographies considered include both the Group's operating areas and those connected with the origin of raw materials and destination markets.

The process considered internal due diligence activities, and internal departments were the main technical source for identifying and understanding impacts in own operations and across the value chain, pending the launch in 2026 of a full Group stakeholder engagement pathway.

Impacts were assessed using a numerical scale, considering:

- for negative impacts: severity (which is composed of scale, scope and irremediable character) and likelihood;
- for positive impacts: scale, scope and likelihood.

All parameters were assessed on a scale from 1 to 5. The final score, also on a scale from 1 to 5, made it possible to rank impacts by priority. A materiality threshold of 3.3 was defined, above which impacts were considered material for reporting purposes.

The identification of risks and opportunities was carried out starting from the impacts identified and the Group's critical dependencies, for example suppliers, raw materials, workforce and regulatory context. Where these dependencies could generate economic and financial effects, they were classified as material risks or opportunities.

For each risk or opportunity, the following were estimated:

- expected economic and financial effects, with reference to the affected financial statement items;
- magnitude;
- likelihood.

Magnitude was assessed on an ordinal scale from 1 to 5, defined according to the expected percentage change in EBITDA, with increasing values associated with progressively higher levels of economic impact. Likelihood was assessed on a scale from 1 to 4, expressing the probability of occurrence of the scenario considered during the reference period.

The final score made it possible to rank risks and opportunities by priority, with a threshold of 3.5 used to determine materiality. For financial materiality, a workshop with the Chief Financial Officer, CFO, represented the key source for assessing risks and opportunities, thanks to his knowledge of the Group's economic and financial situation and strategic vision.

During the double materiality assessment, Sammontana assessed the extent to which material sustainability-related risks and opportunities may have affected, or may result in effects on, its financial position, financial performance and cash flows. Depending on the topic considered, such effects may concern revenues, operating costs, capital expenditure, supply chain continuity, strategic investment priorities and other elements relevant to the Group's business performance. Where relevant, Sammontana also assessed whether the material risks and opportunities identified could generate a significant risk of a material adjustment, within the next annual reporting period, to the carrying amounts of assets and liabilities recognized in the related financial statements. The Group also conducted a qualitative assessment of the evolution of its financial position, financial performance and cash flows in the short, medium and long term, considering the strategy adopted to manage material risks and opportunities. This analysis supports understanding of the interaction between sustainability matters, the Group's strategic direction and the resilience of the business model over time. At the reporting date, Sammontana did not disclose separate quantitative information on current or anticipated financial effects of individual material risks and opportunities where such effects are not separately identifiable or where the level of measurement uncertainty makes the quantitative information not useful.

IRO-2 – Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement

Information relating to material impacts, risks and opportunities (IROs) is presented in a structured and consistent manner within the topical chapters of the Sustainability Statement, in line with ESRS requirements. For each material topic, the Group illustrates actual and potential impacts, risk exposures and related opportunities, highlighting their connection with operating activities and the different stages of the value chain, as well as the potential effects on people, the environment and the resilience of the business model.

The analysis of human rights risks confirms that the Group's exposure to **material risks of forced labour or child labour** is limited to **foreign agricultural supply chains** for critical raw materials, while production sites and direct operations do not present actual risks in this regard. All evidence, including specific risk assessments by country, sector and business relationship, will be subject to further analysis during 2026 through the **Human Rights Analysis**, as described in chapter ESRS S2.

During the financial year, no significant changes were identifiedin material impacts, risks and opportunities compared to the previous reporting period. The analysis is based on the double materiality assessment carried out for the purpose of publishing the Statement for financial year 2024 and confirmed for the current 2025 financial year, since no significant changes occurred in the business model, value chain structure or operating context that would alter the IRO mapping. The classification of material areas therefore remains stable, while continuing to be monitored in light of regulatory developments, market dynamics and the emergence of new relevant factors. Consistently with the development pathway of the new corporate scope, the Group plans to fully renew its double materiality assessment at the end of 2026, in order to ensure a methodological update and a complete reflection on emerging impacts across the value chain.

For the complete list of Disclosure Requirements complied with in preparing the Sustainability Statement, reference is made to the ESRS Content Index on page 94.

In accordance with ESRS 1, chapter 8.2, the Group, through its subsidiary Sammontana Italia S.p.A. Società Benefit, provides certain additional information relevant for the purposes of the sustainability statement. In particular, information arising from the legal status of Società Benefit, pursuant to Law no. 208 of 28 December 2015, is prepared by the Impact Manager and presented within the 2025 Impact Report, which supplements the social and environmental reporting required by national legislation.

Finally, with regards to references to the European Union legislative acts relevant to the applicable cross-cutting and topical standards, these are reported in the table "*List of datapoints in cross-cutting and topical standards that derive from other EU legislation*" on page 101, to which reference is made for a complete overview.

Environmental Disclosures

Climate Change

Table 2. Impacts, risks and opportunities relevant to climate change (E1)

IROs relevant in E1 – Climate Change[11]
Impacts
GHG Emissions Scope 1 & 2 (own operations) – ACTUAL
GHG Emissions Scope 3 (upstream and downstream) – ACTUAL
Emissions Related to Refrigerant Gases (core and downstream) – ACTUAL
Intensive Energy Use in Production Processes (own operations) – ACTUAL
Risks
Damage to structures and property and/or to suppliers caused by extreme events (own operations and upstream)
Disruptions in transport logistics caused by extreme events (downstream)
Fluctuations in fossil fuel prices (upstream)
Opportunities
Potential revenue increase due to the extension of the summer season (own operations)

The double materiality assessment enabled the Sammontana Group to identify the material impacts, risks and opportunities connected with climate change. With reference to own operations, relevant impacts connected with Scope 1 and Scope 2 greenhouse gas emissions are mainly associated with energy consumption, company fleet, the use of refrigerant gases with high GWP (Global Warming Potential) and the energy intensity of production processes. Scope 3 emissions are also material, connected with the sourcing of raw materials, transport activities and downstream stages of the value chain.

The company extends emissions monitoring along the entire value chain, adopting an integrated approach that allows it to identify intervention priorities with greater precision. At the same time, Sammontana assessed physical and transition climate risks, as well as opportunities arising from the transition to a low-carbon economy. The climate risk assessment was conducted consistently with the IPCC (Intergovernmental Panel on Climate Change), scenarios required by the ESRS, namely SSP1 for transition risks and RCP 8.5 for physical risks. The assessment highlighted significant exposures over the short, medium and long term along the value chain, as well as a potential strategic opportunity linked to the extension of the summer season and the consequent evolution in product demand.

[11] **Actual:** impacts with current effects (already occurred) of the company's activities on people or the environment.
Potential: impacts with reasonably foreseeable future effects of the company's activities on people or the environment.
Upstream: impacts occurring in the stages preceding the company within the value chain (suppliers, raw materials).
Core (own operations): impacts generated directly by the company's internal activities (sites, offices, processes).
Downstream: impacts occurring in the stages following the company within the value chain (distribution, product use, end-of-life)

E1-1 – Transition plan for climate change mitigation

During 2025, Sammontana began its decarbonization pathway by defining 2024 as the baseline year for measuring greenhouse gas emissions and for assessing progress in emission reductions over the medium to long term.

Although a transition plan for climate change mitigation fully aligned with the requirements of ESRS E1-1 has not yet been formalized, the Group is adopting a decarbonization plan aligned with SBTi scientific criteria, with formal approval expected by 2026. The plan provides for the launch, in 2026, of a cost-benefit analysis aimed at defining financial planning consistent with the decarbonization pathway and with the investments required to support the transition. Following this analysis, the Transition Plan will be formalized. The plan will be integrated into industrial plans and capital allocation mechanisms, further strengthening the integration between economic strategy and climate objectives. Furthermore, once the Group obtains Benefit Corporation status, it will adopt the same Articles of Association as Sammontana Italia S.p.A. and the related five common benefit purposes, including the ecological transition towards a decarbonized society. This would enable the Group to integrate into its corporate strategy the objective of contributing to the ecological transition and operating consistently with a pathway compatible with limiting the increase in global temperature to 1.5°C, in line with the Paris Agreement and the European objective of climate neutrality by 2050.

The analysis of emissions hotspots, where the largest share of the company's climate impact is concentrated, showed that emissions linked to agricultural raw materials exceed the materiality threshold of 20% of the total inventory. Sammontana is therefore subject to the SBTi FLAG (Forest, Land, Agriculture) Guidance[12] requiring a decarbonization approach structured along two lines: on the one hand, industrial targets relating to energy, processes and logistics; on the other hand, specific targets for agricultural components.

In this context, the Group has defined:

- **Near-term targets for 2030**, which include:
    - an absolute reduction of 25.2% in Scope 1 and Scope 2 emissions;
    - a Supplier Engagement program aimed at engaging key suppliers, responsible for 67% of the Group's industrial Scope 3 emissions, to set decarbonization targets aligned with SBTi;
    - an absolute reduction of 18.18% in Scope 3 FLAG emissions(i.e. emissions deriving from agricultural activities.)
- **Long-term targets for 2050**, which include:
    - a 90% reduction in absolute industrial emissions;
    - a 72% reduction in FLAG emissions;
    - neutralization of residual emissions through permanent carbon removal solutions.

The levers identified range from the progressive electrification of industrial processes to the increase in renewable electricity, from reducing the impact of cold-chain logistics to the adoption

[12] The **SBTi FLAG Guidance** is the world's first science-based standard developed by the Science Based Targets initiative (SBTi) to support companies in setting emissions reduction targets related to **Forest, Land and Agriculture** (FLAG). It provides guidance for the decarbonization of the agri-food, textile, and forestry sectors.

of refrigerants with low GWP, through to interventions in the agricultural supply chain, in line with FLAG standards, and the eco-design of packaging.

Achievement of these targets is, however, subject to significant external dependencies, including: the ability of agricultural suppliers to adopt more sustainable practices; the availability of technologies for process electrification and cold-chain logistics; access to recyclable or lower-impact packaging; and the evolution of the regulatory framework, technology costs and consumer preferences. Some potential *locked-in* emissions, which the Group is structurally set to generate due to existing assets, technologies, operating models or contracts, also derive from technical and economic barriers, such as the difficulty of immediately replacing all fossil fuels in thermal processes, the adoption of natural refrigerants, dependence on renewable energy costs and the complexity of activating reduction pathways among suppliers not directly controlled by the Group.

Despite these critical issues, the Group has already achieved tangible results:

- the use of liquid CO_2 of biogenic origin in croissant production reduced fossil-origin emissions by approximately 4,200 tons of CO_2eq;
- the replacement of refrigerant gases with low-GWP alternatives made it possible to prevent future Scope 1 emissions, which are material and account for approximately 28% of Scope 1 emissions;
- the increase in overall purchases of electricity from renewable sources (equal to +24,843 MWh compared with 2024) and certified through Guarantees of Origin, together with a sharp decrease in electricity from non-renewable sources (equal to -11,496 MWh compared with 2024) despite the expansion of the operational reporting scope.

The Plan is approved by the Board of Directors, which verifies its consistency with the corporate strategy and common benefit purposes. Senior Management ensures its operational implementation, with the support of the Sustainability Department and the corporate departments involved. Periodic monitoring of results and reporting ensure transparency and accountability in pursuing climate targets.

E1-2 – Identification of climate-related risks and scenario analysis

In 2025, Sammontana confirmed the validity of the climate resilience considerations carried out in 2024 as part of the double materiality assessment, deeming them still applicable to the current financial year, as no significant changes have occurred in climate scenarios, risk exposure, or the Group's operating conditions that would require an update. The analysis distinguishes between physical risks and transition risks, assessing potential impacts on operating activities, production sites and the upstream and downstream value chain.

- **Physical risks** concern the direct effects of climate change and include the increased frequency and intensity of extreme events such as heatwaves, floods and droughts, with possible damage to company and supplier infrastructure, interruptions to production processes and impacts on the availability and cost of agricultural raw materials. No site-specific hazards were identified, but the general risk of extreme events potentially affecting company assets and the value chain was considered. These risks were assessed considering their likely increasing frequency, or likelihood, from the short to the long term, medium-high damage, or magnitude, with particular attention to exposed assets and value-chain dependencies.

- **Transition risks** derive from the shift towards a low-carbon economy and are linked to regulatory developments, fossil fuel price dynamics, technological adjustment, regulatory policies and market changes. For Sammontana, the most significant transition risk in the medium term is represented by the volatility of fossil energy prices and the resulting impacts on operating costs. The risk was assessed on the basis of high likelihood in the medium term, significant impact on operating costs, or magnitude, and criticality for energy-intensive sites and cold-chain logistics.

The assessment of potential financial effects was conducted by expressing the expected impacts on operating costs, revenues and assets as a percentage of EBITDA, consistently with the short, medium and long-term time horizons defined by ESRS 1.

For the assessment of transition risks, the IPCC SSP1 scenario was adopted consistently with the Paris Agreement and the objective of limiting global warming to 1.5°C. This is a prudent choice, since the most ambitious mitigation scenario also implies greater exposure to transition risks, due to the speed and depth of the changes required in production, energy and consumption models. In this framework, a context is assumed that is characterized by strong international cooperation, ambitious climate policies and structural incentives for sustainability, accompanied by growing demand for sustainable products and greater attention to transparency and environmental impact along the entire value chain. At the same time, the scenario envisages rapid decarbonization of the energy mix, with widespread deployment of renewable sources and accelerated adoption of clean technologies, energy efficiency solutions and lower-impact materials, including biodegradable packaging.

With regards to physical risks, in line with ESRS E1, the high-emissions IPCC RCP 8.5 scenario was used as a reference. This scenario describes a context of no climate mitigation. It assumes greater frequency and intensity of extreme events, such as heatwaves, droughts and floods, with possible material impacts on the availability and cost of agricultural raw materials, operational continuity of sites, logistics and distribution disruptions, and overall market dynamics.

The main uncertainties in the risk analysis carried out include the actual evolution of future climate conditions compared with the assumed scenarios, the timing and actual severity of climate policies adopted, volatility in agricultural raw material markets and changes in consumer preferences towards sustainable products. All these factors may significantly alter the materialization and impact of the risks identified.

E1-3 – Resilience in relation to climate change

Following the identification of the main physical and transition risks described in E1-2, the Group has not, to date, carried out a climate resilience analysis in line with the requirements of ESRS E1-3. To mitigate the risks identified, Sammontana intends to strengthen its management strategies through investments in more efficient technologies and the progressive diversification of energy sources.

Sammontana has already implemented a set of measures that may contribute to the Group's climate resilience, including:

- **integration of the resilience analysis into the ISO 14001 Environmental Management System**, to ensure continuous monitoring of risks and opportunities;

- **investments in supply chain adaptive capacity**, through analysis and possible revision of the sourcing strategy and continuous monitoring of the raw materials market;
- **energy efficiency and source diversification initiatives**, aimed at reducing exposure to fossil fuel volatility;
- **adoption of more efficient and resilient technologies**, supporting operational continuity even under adverse climate conditions.

E1-4 – Policies related to climate change mitigation and adaptation

The Sammontana Group adopts a set of policies that provide an integrated framework for managing climate impacts across its activities and value chain. These policies define principles, objectives and operational commitments that guide the Group in reducing emissions, responsibly managing natural resources and preventing environmental risks, contributing to the climate transition pathway and to the resilience of production processes. The relevant policies are described in greater detail in paragraph ESRS 2 SBM-3, which includes information required by the Disclosure Requirements under GDR-P.

With reference to climate change, the **Sustainability Policy** defines an integrated ESG strategic framework, introducing among its priorities the progressive reduction of CO_2 emissions across Scope 1, Scope 2 and Scope 3 and the adoption of production and distribution models oriented towards circularity. This policy is based on relevant supranational references, which guide the Group towards a structured decarbonization pathway. Commitments include energy efficiency, food waste reduction, adoption of more sustainable packaging and enhancement of responsible supply chains, contributing to the mitigation of indirect emissions upstream and downstream. Monitoring is supported by ESG performance measurement systems, periodic audits and updates to the B Impact Assessment, tools that ensure continuous improvement and the progressive integration of climate objectives into corporate decision-making processes.

The **Environmental Policy** translates strategic commitment into a set of operational guidelines aimed at efficient resource management and control of atmospheric impacts, elements directly connected with climate change. The Group is committed to reducing energy consumption, increasing sourcing from renewable sources, improving air emissions, including odor and fugitive emissions, and enhancing the environmental performance of production sites. The policy provides for the use of Life Cycle Assessment (LCA) to guide eco-design choices and the use of materials with lower carbon impact. The corporate commitment also includes improving the management of waste, water discharges and by-products, contributing to emissions mitigation through more efficient use of resources. All of this is framed within an Environmental Management System compliant with ISO 14001, which ensures a systematic approach to monitoring and continuous improvement.

The **No Deforestation Policy** represents an essential tool within the Group's climate strategy, as deforestation is one of the main global drivers of increased greenhouse gas emissions. The objective is to ensure that the risk that products covered by Regulation (EU) 2023/1115 originate from deforested areas is zero or negligible, thereby contributing to the protection of forest ecosystems and maintaining their CO_2 absorption function. This commitment strengthens the Group's ability to mitigate indirect emissions connected with sourcing chains, integrating climate risk management into supplier selection and monitoring processes.

E1-5 – Actions and resources in relation to climate change mitigation and adaptation

To effectively address the challenges posed by climate change, Sammontana has defined and implemented concrete actions, accompanied by initiatives aimed at managing its climate-related impacts, risks and opportunities.

Actions already undertaken

- In 2025, the Group increased the share of electricity sourced with **Guarantees of Origin** (GOs) for the production sites of Vinci (Italy) and Saint-Auvent (France). Overall, 75% of the electricity purchased by Sammontana is covered by GO certificates, contributing significantly to the reduction of indirect emissions associated with energy consumption. Based on the market-based approach, this initiative is estimated to have avoided the emission of approximately 24,000 tons of CO_2eq into the atmosphere during financial year 2025.
- In 2025, Sammontana completed the **modernization of the ammonia refrigeration plant** at the Vinci site, in the province of Florence, introducing a two-stage technology typically used in high-efficiency industrial refrigeration to achieve low operating temperatures, between -30°C and -35°C. The intervention significantly improved the plant's energy performance, generating savings of approximately 2,320 MWh compared with the previous year. Lower electricity demand also resulted in a reduction in indirect greenhouse gas emissions: according to the market-based approach, the action is estimated to have avoided approximately 1,060 tons of CO_2eq in 2025. Overall, the adoption of two-stage technology represents a relevant contribution to the Group's climate mitigation pathway, improving the site's operational efficiency and reducing the emissions footprint associated with energy consumption.
- Also in 2025, Sammontana purchased 4,200 tons of **liquid carbon dioxide of biogenic origin**, replacing fossil-origin CO_2, for the Colognola ai Colli site in Italy. This liquid CO_2 is used in the bakery production process for cooling doughs, helping to avoid the release of fossil CO_2 into the atmosphere and contributing to the reduction of Scope 1 GHG emissions.
- Further intervention concerns the **replacement of refrigerant gases with low-GWP alternatives**, with the goal of reducing GHG emissions in the event of accidental leaks from refrigeration systems.
- Lastly, the Group launched a **modernization plan for the Empoli production plant, in Italy, to reduce energy consumption** and Scope 1 and Scope 2 GHG emissions.

Planned actions

- Sammontana will install **new high-efficiency production lines**: the *bakery* line is nearing completion at the Vinci site, while the *doughnut* and *pancake* lines will be operational by the first half of 2026 at the San Giuliano Milanese site. These interventions will contribute to reducing energy consumption and, consequently, GHG emissions.

E1-6 – Targets related to climate change

For financial year 2025, Sammontana does not have formally defined climate change targets pursuant to the requirements of ESRS E1. However, in December 2025, Sammontana formalized its commitment to the **Science Based Targets initiative (SBTi)** undertaking to define emission reduction targets aligned with a decarbonization pathway consistent with limiting the increase in global temperature to 1.5°C.

The company has developed a mitigation plan that identifies emissions hotspots along the value chain and defines priority areas for action. The analysis confirmed that Sammontana falls within the scope of the SBTi FLAG (Forest, Land and Agriculture) Guidance, since emissions attributable to agricultural raw materials (including milk, cream, sugar, flours and vegetable fats), significantly exceed the relevance threshold of 20% of the overall inventory. This positioning requires the adoption of a dual-track reduction strategy, comprising industrial (Energy/Industrial), targets relating to processes and logistics, and FLAG targets specific to emissions of agricultural origin.

Within the Mitigation Plan, Sammontana identified the main decarbonization levers that can be activated in the coming years and defined a technical roadmap for the validation, by the mandatory deadline of December 2027, of climate targets compliant with SBTi criteria and aligned with the 1.5°C scenario. The targets had not yet been validated by SBTi at the time of publication of this report.

E1-7 – Energy consumption and mix

Table 3. Energy consumption and mix

Energy consumption	UoM	2024[13]	2025	Variation
Total energy consumption	MWh	182,923	231,100	48,177
Total energy consumption from fossil sources	MWh	149,266	172,500	23,234
From fuels — mobile and stationary	MWh	116,905	151,635	34,730
Purchased electricity	MWh	32,361	20,865	-11,496
Produced and self-consumed	MWh	N/A	N/A	N/A
Total energy consumption from renewable sources	MWh	33,658	64,584	30,927
From fuels — biofuels	MWh	94	167	73
Purchased electricity	MWh	32,434	57,277	24,843
Produced and self-consumed	MWh	1,130	1.156	26
Energy intensity	MWh/€M	274.1	240.8	-33.3

Table 4. Breakdown of energy consumption from fossil sources

Energy consumption from fossil sources	UoM	2024[14]	2025	Variation
from coal and coal products	MWh	N/A	N/A	N/A
from crude oil and petroleum products	MWh	11,874	18,098	6,224
from natural gas	MWh	105,031	133,537	28,506
from other fossil sources	MWh	N/A	N/A	N/A
consumption of purchased or acquired electricity, heat, steam or cooling from fossil sources	MWh	32,361	20,865	-11,496

[13] The 2024 date have been restated following a refinement of the calculation method.
[14] The 2024 date have been restated following a refinement of the calculation method.

During fiscal year 2025, the Sammontana Group's total energy consumption amounted to 231,100 MWh, an increase compared with the previous year due to the expansion of the Group's corporate scope, and of the scope included in the reporting.

The Group's energy mix includes both electricity and fossil fuels, including diesel, petrol and natural gas, mainly used for logistics, transport and certain production processes. In particular, the Group's energy-intensive profile is driven by the use of natural gas (133,537 MWh), compared with other types of fossil sources.

Although these energy carriers are currently essential to ensure operational continuity, their use represents a critical environmental factor, particularly with regards to climate-altering emissions and the overall energy efficiency of the industrial system.

The **energy purchased** by the Group consists exclusively of electricity, with no purchase of heat, cooling, steam or other forms of energy. Specifically, electricity purchased from fossil sources amounted to 20,865 MWh, while electricity purchased from renewable sources amounted to 57,277 MWh. Within its own operations, the Group does not source electricity from nuclear sources. To date, **25%** of the energy consumed by the Group comes from electricity certified through Guarantees of Origin, or GOs, and represents a concrete lever for reducing indirect greenhouse gas emissions and contributing to improved environmental performance along the value chain.

The Group's energy requirement also includes a share of **self-produced energy**. Self-produced energy from non-renewable sources derives from electricity and thermal cogeneration sites using purchased natural gas. Self-produced renewable energy consumed internally amounted to 1,156 MWh, compared with 1,130 MWh in 2024, equal to 1% of the Group's energy consumption.

Overall, the results show growth in energy volumes managed, mainly attributable to the expansion of the Group's corporate scope and related expansion of the reporting scope.

In addition to energy consumption, the Group's environmental profile includes the use of refrigerant gases to support refrigeration systems and production processes. The table below shows the **quantities of refrigerant gases refilled into systems following leaks detected** during periodic maintenance activities during financial year 2025, expressed in kilograms. During the reporting period, various refrigerant gases were refilled, including R410a, R22, R507a, R448a, R449a, R452a, R404a, R774, R407c and ammonia, in different quantities depending on the specific plant applications. The reported data make it possible to monitor losses of substances with different global warming potential (GWP) and support the management of environmental impacts associated with own operations.

Table 5. Quantities of refrigerant gases refilled following leaks

Cooling gases	UoM	2025[15]
R410a	kg	3.630
R22	kg	17.200
R-507a	kg	2,082,650
R448a	kg	152.500
R449a	kg	27.400
R452a	kg	224.200
R-404a	kg	372.430
R774	kg	210.000

[15] The comparative figure for 2024 is not available, as it was not possible to retrieve the data.

R407c	kg	16.50
Ammonia	kg	2,053.00

E1-8 – Gross scope 1, 2, 3 GHG emissions

Sammontana's CO_2 emissions were calculated in accordance with the international ISO 14064 standard, which ensures transparency and comparability of data. The analysis considers Scope 1 emissions, linked to direct fuel consumption, and Scope 2 emissions, reported using both the market-based and location-based approaches.

Table 6. Greenhouse Gas Emissions (GHG) Scope 1 and 2

GHG emissions	UoM	2024[16]	2025	Variation
Total gross Scope 1 GHG emissions	tCO_2eq	46,567.86	44,057.08	-5.39%
Gross Scope 2 GHG emissions, location-based method	tCO_2eq	18,438.2	19,082.02	+3.49%
Gross Scope 2 GHG emissions, market-based method	tCO_2eq	15,763.09	10,355.77	-34.30%
Biogenic Scope 1 GHG emissions	tCO_2eq	4,650.83	4,228.00	-9.09%

Table 7. Greenhouse Gas Emissions (GHG) Scope 3

Scope 3 GHG emissions by category	UoM	2024	2025
Purchased goods and services	tCO_2eq	381,871.34	305,117.79
Capital goods	tCO_2eq	54,533.36	66,524.04
Fuel- and energy-related activities	tCO_2eq	17,244.09	12,181.53
Upstream transportation and distribution	tCO_2eq	53,024.02	55,314.02
Waste generated in operations	tCO_2eq	4,734.11	1,381.57
Business travel	tCO_2eq	150.65	187.86
Employee commuting	tCO_2eq	6,947.80	8,933.06
Upstream leased assets	tCO_2eq	992.13	1,237.03
Downstream transportation and distribution	tCO_2eq	-	-
Processing of sold products	tCO_2eq	-	-
Use of sold products	tCO_2eq	95,645.81	119,270.93
End-of-life treatment of sold products	tCO_2eq	12,346.29	15,395.90
Downstream leased assets	tCO_2eq	-	-
Franchises	tCO_2eq	-	-
Investments	tCO_2eq	-	-
Total gross indirect Scope 3 GHG emissions	tCO_2eq	627,489.78	585,543.76

[16] The 2024 date have been restated following a refinement of the calculation method.

E1-9 – GHG removals and GHG mitigation projects financed through carbon credits

The Group did not carry out greenhouse gas removal activities and did not purchase carbon credits.

E1-10 – Internal carbon pricing

The Group does not have an internal carbon pricing mechanism.

Pollution

Table 8. Material impacts, risks and opportunities relating to pollution (E2)

IROs relevant in E2 – Pollution
Impacts
Soil pollution at suppliers' production sites (upstream) - ACTUAL
Air pollution at suppliers' production sites (upstream) - POTENTIAL
Pollution from plastic packaging production (downstream) - POTENTIAL
Water pollution at suppliers' production sites (upstream) - POTENTIAL
Pollution from substances of concern or substances of very high concern (own operations) - POTENTIAL

The Group identified the most material environmental impacts linked to pollution along the entire value chain. At operational level, screening of production sites and of the chemical substances used highlighted the presence of substances of concern and SVHC, although limited to own operations. Checks carried out on sites subject to Integrated Environmental Authorisation (AIA) confirmed compliance with the statutory thresholds provided for by the E-PRTR Regulation, with the sole exception of GHG emissions, which are reported separately under ESRS E1. The analysis identified negative environmental impacts both upstream and downstream, but no financially material risks or opportunities. In the upstream value chain, the main impacts concern soil pollution due to the use of fertilizers, air pollution associated with agricultural activities and transport, and water pollution linked to unsustainable agricultural practices and wastewater management. In the downstream value chain, an impact connected with the release of microplastics from the end of life of plastic packaging was recognized, partially mitigated by the increasing use of paper packaging. For internal activities, a potential impact was also identified in relation to the use of chemical substances such as ammonia in refrigeration systems.

E2-1 – Policies related to pollution

The Sammontana Group has adopted a set of environmental policies and procedures aimed at preventing and managing pollution arising from its production activities, protecting the environment and ensuring compliance with the applicable regulatory framework. The relevant policies are described in greater detail in paragraph ESRS 2 SBM-3, which includes information required by the Disclosure Requirements under GDR-P.

In the context of pollution, the **Environmental Policy** is the operational reference for pollution management and sets out the company's commitments in the main impact areas. The policy provides for pollution prevention through systematic monitoring and control activities, which make it possible to promptly identify any environmental critical issues. Particular attention is paid to air emissions, including odour and fugitive emissions, for which the company is committed to progressively improving performance and reducing impacts on air quality in the areas surrounding the sites. The policy also defines clear targets for improving water discharges through the adoption of systems and practices that help reduce pollutant loads in industrial wastewater and optimize the efficiency of treatment processes.

The **Sustainability Policy** defines the framework for reducing environmental impacts linked to pollutants, promoting the use of materials and packaging with lower pollution potential, responsible design criteria and conscious management of supply chains. The approach is supported by ESG KPIs and periodic audits to safeguard continuous improvement in environmental performance.

In addition to policies as a general framework, Sammontana has an **Environmental Management System (EMS)** compliant with ISO 14001, which makes it possible to monitor and reduce environmental impacts associated with company activities, ensuring control over the main sources of pollution, including emissions, discharges and waste, as well as compliance with applicable regulations. The system is formally implemented at Italian sites, while equivalent operating practices are applied at foreign sites, ensuring consistent oversight of environmental risks and coherent management of impacts across the Group's entire operational scope.

E2-2 – Actions and resources related to pollution

To manage this topic in own operations, Sammontana adopts a coordinated set of technical and management measures aimed at preventing unwanted emissions, reducing potential pressure on the various environmental matrices and ensuring continuous oversight of operational risks.

Actions already undertaken

- **Manual against ammonia leaks from cooling systems:** the Group developed a dedicated manual for the prevention and management of potential ammonia leaks at production sites where ammonia is used in refrigeration systems (Empoli, Colognola ai Colli, Vinci, Maser and San Giuliano Milanese). The manual governs staff training, operating procedures for refrigeration technicians and the use of the automatic detection system. The document also defines first-aid measures to be applied in the event of an emergency, ensuring a uniform reference for all operators involved. Employee training and the review or control of procedures by safety management take place annually. Thanks to correct plant management and timely interventions, no significant ammonia leaks have been recorded in the last three years.
- **Environmental Management System Manual (EMS):** the EMS Manual formalizes the Group's approach to monitoring and reducing its environmental impacts, structuring roles, responsibilities and site-specific operating procedures. It refers to all instructions relating to the management of the main pollution sources for air, water and soil, consistently with current legislation and environmental authorization obtained. The objective of the system is to ensure regulatory compliance and promote the adoption of market best practices from a continuous improvement perspective. The procedures verified under ISO 14001 relate to the Italian production sites of Empoli, Vinci and Colognola ai Colli, while a feasibility study is under way to extend the system to other sites, starting with the most complex and impactful sites.
- **Covering of the Empoli site wastewater treatment plant to reduce odor emissions**: during 2025, the project for the confinement and treatment of odor emissions at the Empoli site was completed, based on the installation of physical covers and the use of high-efficiency photocatalytic filters to remove pollutants. This technology enables a significant reduction in odor units. The intervention is intended to ensure that odor deposition at ground level remains within the limits set by current legislation.

E2-3 – Targets related to pollution

At the reporting date, the Group did not define specific quantitative or qualitative targets for the management of impacts in own operations and the value chain connected with pollution pursuant to ESRS E2. For own operations, compliance with applicable regulatory thresholds and the consequent absence of breaches of legal limits mean that adoption of dedicated measurable targets is not currently necessary. However, the Group recognizes the importance of managing this topic and maintains an active system for monitoring and controlling environmental performance, while reserving the right to assess, in the medium term, the opportunity to introduce improvement targets should new regulatory, operational, or contextual requirements emerge.

E2- 4 – Pollution of air, water and soil

The analysis of emissions generated by the Group's own operations shows that, for all categories provided for by the E-PRTR Regulation (air, water and soil), emission levels are below the relevance thresholds established by current legislation[17]. Considering these findings, and consistently with the requirements of ESRS E2-4, the Group does not report on its own quantitative metrics.

E2-5 – Substances of concern and substances of very high concern

Responsible management of substances of concern and very high concern is a central aspect of the Group's environmental strategy, particularly regarding pollution prevention and the protection of human health and ecosystems. The Group monitors the use of these substances within its production processes, with the objective of ensuring regulatory compliance, reducing potential environmental impacts and promoting safer and more sustainable use of chemical resources.

The disclosure focuses on substances classified as substances of concern or substances of very high concern under European legislation, for example REACH, with particular attention to those used in refrigeration systems or other critical technical processes. This year it was not possible to collect metrics relating to the quantities of substances of concern and very high concern, as such information is not currently required by applicable legislation and does not fall within the data usually tracked by the company for operational or management purposes. Instead, with reference to the quantity of ammonia refilled following leaks at production centers for cooling systems, reference is made to the detailed information provided in the refrigerant gases table in chapter E1.

[17] Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation, replacing the E-PRTR)

Water

Table 9. Material impacts, risks and opportunities relating to water (E3)

Material IROs in E3 – Water
Impacts
Water withdrawal for production sites (own operations) – ACTUAL
Water consumption in production processes (own operations) – ACTUAL
Water withdrawal by production sites in areas with water stress (own operations) – ACTUAL
Improperly managed water withdrawal (upstream) – POTENTIAL

The Group identified the most relevant impacts linked to the use of water resources, considering the water-intensive nature of the food sector and ice cream production. At operational level, material impacts are associated with water withdrawal and water consumption at production sites, two of which are located in areas vulnerable in terms of water availability. Water is used in numerous stages of the process, from recipe formulation to washing and cooling systems, generating pressure on local ecosystems. In the upstream phase, a potential impact was also identified in relation to water withdrawal by agricultural, livestock and food-processing suppliers, sectors characterized by high water intensity and possible negative effects on water resources and aquatic ecosystems. No financially significant risks or opportunities were identified.

E3-1 – Policies related to water

The Sammontana Group adopts an integrated framework of environmental policies that guide responsible water management throughout all stages of the production process. These tools define principles, objectives and operational commitments aimed at protecting the availability and quality of water, reducing pressure on ecosystems and ensuring full compliance with current regulations. The relevant policies are described in greater detail in paragraph ESRS 2 SBM-3, which includes information required by the Disclosure Requirements under GDR-P.

With regards to water management, the **Environmental Policy** is the main operational reference. The policy provides for the containment of water consumption, improvement of discharge quality and reduction of pollutant loads associated with industrial wastewater, with the objective of protecting water ecosystems and limiting contamination risks. The Group attaches importance to preventing water pollution through constant controls on wastewater parameters and progressive optimisation of treatment processes. In addition, the use of Life Cycle Assessment is promoted to identify the phases of processes and products with the greatest impact on water consumption and to guide design and management improvements.

The **Sustainability Policy** includes among its objectives the protection of natural resources, with particular attention to reducing impacts along the supply chain and safeguarding water ecosystems. The policy encourages responsible use of water, minimization of waste and adoption of production practices that limit pressure on local resources. Through environmental performance monitoring systems and periodic checks, the company assesses the water footprint of its activities and introduces corrective measures that help reduce potential impacts connected with water withdrawal and water discharge.

With regards to the management of impacts and risks connected with areas with water stress, the Group conducted an exposure analysis using the Aqueduct Water Risk Atlas platform[18]. This tool made it possible to assess the level of water stress in the areas where production sites are located, based on the ratio between total water demand and available renewable water resources. The analysis showed that the Empoli and Vinci sites in Italy are located in areas classified as extremely high-water stress, La Rocca (Ontario, Canada) is located in an area classified as high water stress, while other sites, such as Maser and Jesolo (Italy) fall within medium-high water stress areas. These sites are covered by the Environmental and Sustainability Policies.

E3-2 – Actions and resources related to water

Sammontana adopts a structured approach to responsible water management, acting both within own operations and along the supply chain, with the objective of improving consumption efficiency, promoting sustainable water use and reducing exposure to risks related to water stress. The actions currently under way and those planned reflect an integrated strategy based on monitoring, technological innovation and supply chain collaboration.

Actions already undertaken

- **Implementation of flow meters at production sites:** the Group launched a program to increase the number of flow meters installed at the Maser production site in Italy, with the goal of obtaining more precise and granular monitoring of water consumption. The progressive extension of the measurement infrastructure to the entire industrial scope will make it possible to identify areas and processes with greater water intensity, facilitating the identification of inefficiencies and the definition of targeted interventions to reduce withdrawals. This activity represents a key element for improving operational control capacity and supporting decisions based on objective data.
- **Site initiatives "*Codice della Mandorla*" (The Almond Code)[19]:** Within the supply chain, Sammontana promotes the "Almond Code" initiative, aimed at the production of Sicilian almonds used for the Amando product line. The protocol introduces criteria for monitoring water consumption throughout the entire agricultural process, fostering more efficient practices and reducing the risk of waste during cultivation phases. The initiative contributes to enhancing transparency and sustainability upstream of the value chain, with particular attention to the water performance of the agricultural producers involved.
- **Supplier assessment in terms of water resource use:** in 2025, data collection was initiated through the supplier assessment questionnaire, with the aim of first mapping water consumption across the supply chain. The Group is consequently evaluating the adoption of a target linked to the selection of low-impact raw materials in terms of water use. This commitment would be embedded within the Sustainability Policy and applied across the entire supply chain, both primary and secondary. The objective under consideration is to integrate water sustainability criteria into supplier selection processes, with particular focus on agricultural supply chains, in order to reduce the indirect water footprint of products.

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[18] Developed by the World Resources Institute (WRI), it is an online tool for assessing and mapping water-related risks associated with water availability, water quality, and extreme hydro-climatic events. It is used in sustainability reporting to support the analysis of exposure to risks across both own operations and the value chain, under current and future scenarios.

[19] For further information, please refer to the following link: https://www.sammontana.it/codice-della-mandorla.html

Planned actions

The Group is committed to implementing initiatives aimed at further strengthening the sustainable management of water resources, particularly at facilities located in areas of high-water stress, such as Empoli e Vinci.

- **Installation of an osmosis plant at the Empoli site (Italy)**: in 2025, an osmosis plant was installed for the treatment of water entering the refrigeration systems. Testing had not yet been completed on the 31st of December 2025 and will continue in 2026. Better water quality makes it possible to reduce the frequency of blowdowns, resulting in lower volumes withdrawn from wells and discharged into the sewer system. The intervention, which already made it possible to observe a benefit during testing, is an integrated measure for reducing water consumption and optimizing internal reuse of the resource. In 2026, the testing phase will be completed, and the full effectiveness will be monitored, with a view to identifying absolute targets during the year.
- **Implementation of an osmosis plant and strengthening of the treatment system at the Vinci site (Italy)**: in 2025, an osmosis plant was installed, together with strengthening of the existing treatment system, with the objective of increasing the share of water recovered and reused in cooling processes, while keeping total withdrawal and discharge volumes unchanged. The project, which was in the testing phase on the 31st of December 2025, shows from the first tests a further improvement in water performance indicators per unit of product and a strengthening of the site's resilience in relation to local water availability. These performance improvements will need to be confirmed in 2026, when testing will be completed and the system will be officially operational.

E3-3 – Targets related to water

The Group has defined water management targets consistently with its environmental and sustainability policies, with the aim of progressively reducing the water impact of its production activities and promoting more efficient and responsible use of the resource along the value chain.

The first target concerns the **reduction of water supply volumes** at certain Group production sites by 2026. This target is directly connected to the Environmental Policy and applies to production sites located in Italy that have been identified as subject to high water stress. The value is expressed in relative terms and makes it possible to assess water efficiency in relation to actual production. Progress is monitored through the indicator "cubic metres per tonne of finished product" (m^3/t). The 2025 targets for the Empoli, Vinci and Colognola ai Colli sites were achieved, and new targets have been identified for FY2026. The San Giuliano Milanese, Maser, Jesolo, Saint-Auvent, La Rocca and Bindi North America sites envisage targets to maintain the water intensity achieved in FY2025.

Table 10. Water intensity in FY2021 and related reduction target for each production site

Production site	UoM	Water intensity baseline[20]	Water intensity achieved FY2025	Water intensity target FY2026

[20] The new targets for the facilities in San Giuliano Milanese, Maser, Jesolo, Saint Auvant, La Rocca, and Bindi North America do not include a baseline for FY2021.

Empoli (Florence-ITA)	m^3/t	FY2021: 7.500	6.704	6.500
Vinci (Florence-ITA)	m^3/t	FY2021: 3.276	2.639	2.100
Colognola ai Colli (Verona—ITA)	m^3/t	FY2021: 7.256	5.950	6.117
San Giuliano Milanese (Milan – ITA)	m^3/t	-	47.790	47.790
Maser (Treviso — ITA)	m^3/t	-	1.722	1.722
Jesolo (Venice — ITA)	m^3/t	-	3.240	3.240
Saint-Auvent — France	m^3/t	-	5.850	5.850
La Rocca, Ontario — Canada	m^3/t	-	2.240	2.240
Bindi North America (New Jersey — USA)	m^3/t	-	21.370	21.370

In response to the presence of sites located in areas characterized by high water stress, specific interventions have been planned for Empoli and Vinci, Italy, as described in paragraph E3. Water consumption at these sites is monitored monthly, in order to ensure constant control and guide corrective actions.

E3-4 – Water metrics

During financial year 2025, total water consumption at the Group's production sites amounted to 523,938 m^3, calculated as the difference between water inflows, equal to 1,186,907 m^3, and outflows, equal to 662,968 m^3. For sites located in areas with water stress — Empoli, Vinci, Jesolo, Maser and La Rocca — total water consumption reached 124,611 m^3. In these contexts, sustainable water management plays a strategic role, also in light of the increasing pressure on local ecosystems.

Table 11. Water metrics

Water data[21]	**UoM**	**2024**	**2025**	**Variation**
Total water consumption	m^3	269,794	523,938	254,144
Total water consumption in areas with water stress	m^3	152,041	124,611	-27,430
Total water withdrawal	m^3	N/A	1,186,907	N/A
Total water discharge	m^3	N/A	662,968	N/A
Water intensity	m^3/€M	404.3	545.8	141.5

The Group's main water supply sources include water supplied by the public aqueduct and groundwater through wells, with a residual contribution from surface water at the Maser site. Wastewater generated by production activities is mainly conveyed to the public sewer system after biological treatment, while a residual share is returned to the environment through retention basins, after dedicated treatment and periodic analytical monitoring aimed at ensuring qualitative compliance.

The reported data mainly derives from direct measurements taken using flow meters installed at the sites. For certain sites, Maser and Jesolo, where complete measurements were not available, values were determined through estimates based on sector standards and internal historical

[21] A portion of the water used within the production plants is recycled; However, to date, it is not possible to calculate the amount of water recycled or reused. It is also specified that water is never stored inside the systems.

data, adopting a prudent approach and taking into account the operational specificities of individual sites. The information reported has not been validated by an external body.

A comparison between the two financial years shows a significant increase in the main water flows. In particular, total water consumption increased from 269,794 m^3 in 2024 to 523,938 m^3 in 2025. However, consumption in areas with water stress decreased from 152,041 m^3 to 124,611 m^3, thanks to the installation of osmosis sites at the Empoli and Vinci sites, which were being tested at 31 December 2025. For 2025, data on total water withdrawal, equal to 1,186,907 m^3, and total water discharge, equal to 662,968 m^3, are also available for the first time, as these were not reported in the previous financial year.

The increase recorded is not attributable to homogeneous operational changes, but mainly to the expansion of the Group's corporate scope and the consequent expansion of the reporting scope. Overall, the data show growth in water volumes managed that is consistent with the evolution of the consolidated scope.

With regards to metrics relating to recycled/reused water and stored water, the Group does not currently carry out recycling activities and does not have storage systems.

Biodiveristy and ecosystems

Table 12. Material impacts, risks and opportunities relating to biodiversity and ecosystems — E4

Material IROs in E4 – Biodiversity and ecosystems
Impacts
Change in land use by raw material suppliers (upstream) – ACTUAL
Biodiversity loss due to soil and water pollution (upstream) – POTENTIAL
Impact on species (upstream) – POTENTIAL
Risks
Risk of business interruption and/or reputational damage following environmental damage and consequent impact on biodiversity (upstream)

The Group identified impacts, dependencies and key risks related to biodiversity and ecosystems along the entire value chain, with particular relevance in upstream activities. The most significant impacts emerge in agricultural production, where intensive practices, including the use of fertilizers and pesticides and unsustainable water management, can generate soil and water pollution and contribute to biodiversity loss. Further pressures derive from livestock activities, associated with air, soil and groundwater contamination and extensive land use, with negative effects on ecosystems. Another material impact also concerns land-use change, frequent in non-EU contexts, where the conversion of natural habitats, deforestation and monocultures lead to habitat loss and biodiversity reduction. These phenomena create critical dependencies for the Group on ecosystems whose integrity is essential for continuity of supply, with potential operational and reputational risks.

E4-1 —Biodiversity and ecosystems transition plan

The Group has not currently defined a transition plan aimed at steering the business model and corporate strategy towards the progressive reduction of impacts on biodiversity and ecosystems along its upstream value chain. However, the Group is aware of the potential indirect impacts that may arise from its activities along the supply chain, particularly in relation to land use, natural resources and pressure on ecosystems.

In this context, starting from December 2025, Sammontana joined the **Corporate Engagement Programme of the Science Based Targets Network (SBTN)**, with the goal of launching a structured pathway for analyzing and monitoring impacts on biodiversity along the value chain. SBTN is an international initiative bringing together more than 45 organizations and aims to support companies and cities in setting science-based targets designed to operate within planetary boundaries and contribute to restoring the balance of global commons. The methodologies developed by SBTN, building on the experience gained by the Science Based Targets initiative for climate, will progressively be extended to land, biodiversity, freshwater and ocean topics, providing measurable and actionable tools to assess impacts along the entire value chain and in the most relevant geographical contexts. Joining the program therefore represents a preliminary and strategic step to gradually and scientifically integrate biodiversity protection and ecosystem safeguarding into the Group strategy and to assess, in the future, the definition of dedicated targets and transition plans.

E4-2 — Policies related to biodiversity and ecosystems

Although Sammontana does not have a policy specifically dedicated to biodiversity, the Group has defined a coherent set of environmental policies that contribute in a structured way to prevent and mitigate impacts on ecosystems. These tools outline principles, objectives and operational commitments aimed at protecting natural capital, reducing pressure on habitats and ensuring responsible sourcing and management practices along the entire value chain. The relevant policies are described in greater detail in paragraph ESRS 2 SBM-3, which includes information required by the Disclosure Requirements under GDR-P.

With regards to biodiversity, the **Sustainability Policy** explicitly integrates the protection of ecosystems and natural resources among the pillars of the Group's ESG strategy, guiding an approach oriented towards minimizing impacts on biodiversity across all production and sourcing stages. In particular, the policy promotes responsible selection of raw materials, favoring practices that limit pressure on natural habitats and ecological cycles. A relevant element is the Group's commitment to prioritizing sourcing from certified sustainable supply chains, which ensure traceability and adherence to recognized environmental standards. The use of certified raw materials helps mitigate the risk of biodiversity loss associated mainly with unsustainable production methods, reducing phenomena such as soil degradation, habitat erosion or irresponsible exploitation of resources. The policy also encourages production and consumption models aimed at reducing environmental externalities, enhancing the supply chain and adopting practices that limit waste generation, releases and ecosystem alteration.

In addition, the **No Deforestation Policy** represents another tool for biodiversity protection, as it directly addresses one of the most significant global drivers of habitat and species loss. The policy thus contributes to protecting forests, which are biodiversity hotspots and play a fundamental role in global ecological stability. The policy supports traceability of raw materials associated with potential impacts on biodiversity, such as loss of forest habitats, reduction of ecosystem services, ecosystem fragmentation and impairment of environmental resilience, particularly with reference to commodities falling within the scope of Regulation (EU) 2023/1115, EUDR).

E4-3 — Actions and resources related to biodiversity and ecosystems

During 2025, Sammontana launched its first structured initiatives to manage material impacts, risks and opportunities linked to biodiversity and ecosystems. The activities launched constitute the first core of a more systemic approach to protecting natural capital and represent the basis for the evolution of the company's management model in this area. It should be noted that, during the period under review, the Group did not use biodiversity offset measures.

Actions already undertaken

- **Adherence to the Science Based Targets Network, SBTN, and launch of the "Assess" phase:** as part of this pathway, the company launched the "**Assess**" phase, the first step in the SBTN framework, aimed at systematically mapping its operating and sourcing activities in order to identify the main environmental pressures and dependencies with reference to land, biodiversity, freshwater, oceans and climate. This activity makes it possible to identify the most relevant impact drivers, priority geographical areas and material issues on which to focus interventions, laying the foundations for subsequent prioritization and target development.

- Use of the ***"Codice della Mandorla"* (The Almond Code)**: the Almond Code is a voluntary specification governing the production of almonds used in the "*Amando*" ice cream line, applying to the Sicilian almond supply chain from 2025. Among the rules shared with actors in the almond supply chain, biodiversity analysis is a central element: all agricultural areas dedicated to almond cultivation will have to implement an environmental monitoring system aimed at detecting the state of biodiversity in cultivated land. This approach will make it possible to collect significant data to assess the impact of agricultural practices and guide any improvement plans, incorporating **elements of nature-based solutions** and promoting agricultural practices that respect local ecological balances.
- **Oasis Sammontana[22] Project:** the Oasis Sammontana project, launched in 2025 in collaboration with **3Bee**[23], a nature-tech company specialized in environmental regeneration, and **Persea[24]**, provides for the creation of a Biodiversity Oasis in Sardinia, where 1,500 trees belonging to 11 native nectariferous species will be planted. These sites will provide shelter and nourishment for local pollinating insects, contributing to the regeneration of a heavily anthropized area, where more than 80% of the land is used for agricultural activities. The initiative forms part of a broader context of enhancing the territory and the link with Made in Italy, accompanying the launch of the new "Mielissa" croissant, sweetened with regenerative organic honey. The project not only aims to protect biodiversity, but also actively involves consumers and retailers through a competition offering tree adoption certificates and an immersive experience called "Beekeeper for a day", which includes a visit to a local farm and activities guided by professional beekeepers. The intervention was not conceived as compensation for environmental impacts, but as a direct ecological regeneration action, as it aims to restore fundamental ecosystem services through targeted ecological interventions. In addition, thanks to the use of advanced digital technologies provided by 3Bee, it will be possible to monitor habitat conditions and the evolution of the Oasis in real time, ensuring careful and transparent management of environmental resources. The initiative is located in a geographical area that is strategic for the Group and represents an ongoing, annual commitment in terms of territorial regeneration and promotion of biodiversity at local level.

During the reporting period, the Group's activities did not affect territories inhabited or used by indigenous peoples, nor did they involve direct or indirect impacts on such communities. Consequently, no consultation processes or processes to obtain Free, Prior and Informed Consent, or FPIC, were necessary.

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[22] https://www.sammontanaitalia.com/it/impegno/progetti-con-il-territorio/oasi-sammontana.html

[23] 3Bee is a company that supports businesses in protecting and enhancing biodiversity through technological solutions and environmental monitoring systems. The Biodiversity Oases, developed in collaboration with companies, are structured initiatives aimed at the protection and regeneration of ecosystems, designed to generate measurable environmental benefits and to strengthen commitments in the field of biodiversity.

[24] Persea is an Italian agricultural company engaged in developing a regenerative agriculture model aimed at sustainable production and the regeneration of natural capital. Through low-impact farming practices and the use of monitoring technologies, Persea promotes biodiversity conservation, the improvement of soil health, and the resilience of agricultural ecosystems, generating measurable environmental benefits across the value chain.

E4-4 — Targets related to biodiversity and ecosystems

The Group has not yet defined specific targets for managing biodiversity impacts along its value chain or for mitigating related environmental risks. However, recognizing the growing strategic relevance of the topic, Sammontana will assess the possibility of defining measurable targets in the future aligned with the Science Based Targets Network (SBTN) framework. Adoption of such targets will allow the Group to progressively integrate biodiversity protection and ecosystem resilience into its sustainability strategies and decision-making processes.

E4-5 — Metrics related to biodiversity and ecosystems change

With reference to biodiversity metrics, for the current financial year the Group has not yet developed entity-specific metrics relating to biodiversity along the value chain. The Group undertakes to assess the adoption of such metrics following an assessment of the applicability of using indirect data and estimates.

Resource use and circular economy

Table 13. Material impacts, risks and opportunities relating to resource use and circular economy — E5

Material IROs in E5 – Resource use and circular economy
Impacts
Waste generation during production processes (own operations) – ACTUAL
Sourcing of food resources and materials (own operations) — ACTUAL
Waste generation upstream in the value chain (upstream) — ACTUAL
Waste generation downstream in the value chain (downstream) — ACTUAL
Development of products from an eco-design perspective (own operations) - ACTUAL
Risks
Sourcing of resources from geopolitically unstable areas (upstream)
Opportunities
Economic gain opportunity from monitoring and selling production process waste (own operations and downstream)

The double materiality assessment identified two main negative impacts linked to the Group's operating activities: the sourcing of virgin raw materials and the intensive use of plastic for packaging, in addition to the generation of waste at production sites. Alongside these, a positive impact was identified thanks to the adoption of circular economy practices, particularly the recovery of food waste for the production of biogas through specialized operators.

Further negative impacts emerge along the value chain: upstream waste generation in suppliers' agricultural and processing activities; downstream, post-consumer waste generation from packaging management by final customers. A cross-cutting positive impact linked to the adoption of eco-design principles in product development was also identified.

From a financial perspective, an upstream risk was identified in connection with sourcing from geopolitically unstable areas, which may lead to cost increases or interruptions in raw material supply. Economic opportunities were also identified both in own operations and downstream in the value chain, particularly linked to the valorization of food waste, which enables the generation of additional revenues and access to incentive mechanisms.

E5-1 — Policies related to resource use and circular economy

The circular economy topic is addressed in the Group's Environmental and Sustainability Policies, which contribute significantly to integrating circular economy principles into corporate processes. Although the Group does not have a policy dedicated exclusively to circularity, the policies in place define objectives and commitments that guide responsible resource management, waste reduction and qualitative improvement of inflows and outflows. The relevant policies are described in greater detail in paragraph ESRS 2 SBM-3, which includes information required by the Disclosure Requirements under GDR-P.

The **Sustainability Policy**, among the pillars of the Group's ESG strategy, focuses on reducing impacts throughout the entire life cycle of products. The policy encourages responsible sourcing choices and production practices inspired by circularity, promoting the adoption of more sustainable packaging solutions, prevention of resource waste and reduction of negative externalities associated with inflows and outflows. In addition, the policy establishes a commitment to using materials selected according to environmental criteria and to progressively evolving production processes to reduce waste generation, favoring the closure of material loops and efficiency in the use of resources.

The **Environmental Policy** defines objectives and operational commitments that play a direct role in managing material flows and reducing waste, which are central elements of the circular economy. In this area, the Group promotes continuous improvement in environmental performance through containment of raw material consumption and optimization, including qualitative optimization, of waste generated. It also favors increasing the quantities sent for recovery, reducing reliance on landfills. The policy also provides for participation in by-product bio-conversion projects, with the objective of transforming production waste into new resources. Lastly, the policy recognizes the importance of eco-compatible design and the use of sustainable materials, elements that reduce the footprint of inflows and ensure outputs with lower environmental impact.

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

In financial year 2025, Sammontana continued several initiatives aimed at increasing the circularity of its processes and managing impacts, risks and opportunities linked to the circular economy in a structured way. The activities range from waste prevention to waste reduction, from the adoption of more sustainable packaging to the promotion of post-consumer recycling in points of sale and in the territory.

Actions already undertaken

- **SLIM Lean Manufacturing Project (*Sammontana Lavorando Insieme Migliora*):** the project, launched in 2021 and adopted by all of the Group's Italian sites, represents the main internal program aimed at improving the efficiency of production processes and reducing operational complexity. The initiative focuses on rationalizing lines, optimizing the mix of product codes and semi-finished products and reducing waste along the entire production chain. The effectiveness of the action is monitored monthly through Overall Equipment Effectiveness (OEE)[25]. In 2025, the project led to significant improvements at the Maser site, where OEE improved from 70% to 75%, machine downtime decreased significantly from 25% to 18%, and production waste consequently decreased.
- **Reduction in the use of plastic in packaging**: during the financial year, the program continued to replace virgin plastic with recycled or certified materials, such as FSC® and ISCC PLUS, and to introduce non-plastic packaging where technically feasible, within the Italian scope. As part of this program, the profitterol product tray was changed from polypropylene to PET with 80% recycled material, covering 614,000 units, and primary paper packaging was converted from double-polyethylene-coated to single-polyethylene-coated structures (covering 23 million units), in order to improve recyclability. Lightweighting actions were also implemented on plastic packaging, with an estimated overall saving of approximately 11 tons of plastic. These initiatives contribute to increasing the share of materials that can be sent to consolidated recycling chains and to reducing the risk of environmental dispersion.

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[25] Overall Equipment Effectiveness (OEE) is the key performance indicator for measuring production efficiency in manufacturing processes, as it enables the quantification of the percentage of planned production time that is effectively converted into productive output. OEE is calculated as the product of three core components — Availability, Performance, and Quality — and provides an integrated view of equipment efficiency, as well as of the main operational losses associated with production processes.

- **Codice della mandorla (The Almond Code)**: in 2025, Sammontana began implementing the Almond Code, a specification developed to ensure full traceability and responsible management of the almond supply chain. Among the rules established by the Code is the use of the circularity index, which enables mapping of the use of virgin raw materials and the final destination of products. This index will allow the Group to assess the design of progressive improvement targets for managing a strategic raw material through circular economy and responsible sourcing principles.
- **LCA Certification:** in 2025, Sammontana extended the LCA Systematic Approach certification, issued by CSQA, a leading certification body in the agri-food sector, to the San Giuliano Milanese, Maser and Jesolo sites. The certification had initially been obtained in 2023 for the Empoli, Colognola ai Colli and Vinci sites. As of the current date, all products manufactured in Italy are therefore covered by an LCA assessment. This recognition certifies the integration of circularity principles into production processes. Through these assessments, the Group identifies areas for improvement to reduce the environmental impacts of its activities, enabling deeper assessment of environmental consequences and a higher level of detail both in the eco-design phase and in the verification of the environmental impact of existing products and processes, thereby strengthening the company's sustainability strategy and competitive positioning.

E5-3 – Targets related to resource use and circular economy

At the reporting date, the Group had not defined specific quantitative or qualitative targets in relation to the management of impacts in own operations and the value chain connected with resource use and the circular economy pursuant to ESRS E5. However, the Group recognizes the importance of overseeing the topic and maintains an active system for monitoring and controlling environmental performance, reserving the right to assess, in the medium term, the opportunity to introduce targets concerning waste reduction, optimization of resource use and strengthening the environmental sustainability of industrial processes.

To date, consistently with the Environmental Policy, the Group has defined a specific material monitoring activity aimed at reuse and rework of waste generated on production lines, measured as the percentage ratio between reused waste and total waste produced. This activity aims to prevent the generation of organic waste through recovery of process waste, with particular reference to ice cream and sweet pastry production sites, whose production characteristics allow surplus materials to be reused. The initiative is currently implemented at the Empoli, Vinci, Colognola ai Colli and Maser sites in Italy. Performance monitoring has been active since 2020 for the Empoli, Vinci and Colognola sites, while the Maser site was included in the monitoring scope from 2025.

The monitoring system has made it possible to improve efficiency and optimize production processes in the Ice Cream and Sweet Pastry divisions. At present, however, it is not applicable to the Patisserie division, due to the complexity of the production flows that characterize these products. It was therefore decided to maintain monitoring only for the two divisions for which the system is effective, in order to promptly identify any critical issues or operational deviations.

E5-4 – Resource inflows

During the reporting period, **the total weight of key materials used**[26] amounted to 96,945 tons. It was not possible to obtain data for the previous financial year; however, comparison of total material inflows shows an overall increase, from 114,293 tons to 142,142 tons. The key materials identified represent 66% of the raw materials used overall and 81% of the packaging materials used. The selection was made considering the most significant materials in terms of weight, as these are representative of the main resource inflows. The key materials reported do not include materials falling within Annexes I and II of the Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials ("Critical Raw Materials Act").

In 2025, **primary materials**, consisting of edible ingredients used in production processes, including sugar, margarine, wheat flour, glucose syrup, coconut oil, skimmed milk powder, butter and semi-finished products such as pastry cream, represented the largest share of materials used, reflecting the evolution of the Group's production volumes.

The total weight of **secondary materials**[27], attributable exclusively to packaging materials, remained substantially stable, increasing from 12,511 tons in 2024 to 12,566 tons in 2025, an increase of 55 tons. These materials mainly include paper packaging, such as boxes, cartons, die-cuts and containers including tubs and lids, and, to a residual extent, PP plastic packaging in direct contact with the product. The share of secondary materials represents the estimated recycled material content in incoming packaging, with reference to packaging not in direct contact with the product. In relative terms, the percentage of secondary materials out of total key materials was 12.64% in 2025.

Table 14. Resource inflows

Resource inflows	UoM	2024	2025	Variation
Total weight of material inflows	tons	114,293	142,142	27,849
of which total weight of secondary materials	tons	12,511	12,566	55
Percentage of total weight of secondary materials	%	11.00	8.84	-2.16
Total weight of key materials	tons	N/A	96,945	N/A
of which total weight of secondary materials	tons	N/A	12,252	N/A
Percentage of total weight of secondary materials	%	N/A	12.64	N/A

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[26] Key materials represent the fundamental materials for carrying out the company's operational activities, as they are necessary to make products and the operation of business processes, as well as relevant in terms of volumes used and business continuity. In 2024 they had not been identified and calculated, therefore there is no comparative data in the table.

[27] Materials that do not come from virgin resources but derive from reuse or recycling processes and are reused as inputs in production cycles.

Table 15. Key materials used

Materials[28]	UoM	2025
Food raw materials		
Sugar	tons	22,252
Margarine	tons	19,131
Wheat flour	tons	10,925
Glucose syrup	tons	9,556
Coconut oil	tons	5,939
Skimmed milk powder	tons	5,075
Butter	tons	4,894
Pastry cream	tons	4,554
Packaging		
Paper box	tons	7,004
Paper carton	tons	4,002
Paper die-cut	tons	1,246
Paper containers, tubs and lids	tons	1,657
PP plastic reels, packaging in contact with products	tons	710

E5-5 – Resource outflows

The products marketed by the Sammontana Group are **consumer food products**, intended for immediate use within a commercial life defined mainly by hygiene and food safety requirements. In this context, **product durability**, understood as extension of useful life through prolonged use, is not a relevant characteristic. Similarly, the **degree of repairability** is not applicable to the type of products offered, as this is not envisaged for food products. Therefore, these aspects are not considered material for assessing the Group's performance in the context of the circular economy.

With regards to the **recyclability rate**, this is calculated exclusively for packaging containing Sammontana products, as the products are food products and do not have recyclability characteristics. With regards to packaging, 80% of total packaging used, in volume terms, was considered in the key materials analysis. For the purpose of calculating recyclability, any material that can be placed in municipal separate waste collection was considered "recyclable". Accordingly, the **packaging recyclability rate is equal to 100%** of the packaging used.

Table 16. Packaging recyclability rate

Rate of recyclable packaging	UoM	2025
Rate of recyclable materials included in the packaging of its key products	%	100
Paper box		
Packaging weight 1	tons	7,004
Weight of recyclable materials included in packaging 1	tons	7,004
Share of recyclable materials in packaging 1	%	100
Paper wrapper		
Packaging weight 2	tons	4,002
Weight of recyclable materials included in packaging 2	tons	4,002

[28] It was not possible to obtain data on the key materials used for the fiscal year 2024.

Share of recyclable materials in packaging 2	%	100
Paper sleeve		
Packaging weight 3	Tons	1,246
Weight of recyclable materials included in packaging 3	Tons	1,246
Share of recyclable materials in packaging 3	%	100
Paper containers (trays and lids)		
Packaging weight 4	Tons	1,657
Weight of recyclable materials included in packaging 4	Tons	1,657
Share of recyclable materials in packaging 4	%	100
PP Plastic films (food-contact packaging)		
Packaging weight 5	Tons	710
Share of recyclable materials in packaging 5	Tons	710
Share of recyclable materials in packaging 5	%	100

With regards to waste management, the Group adopts a responsible approach, with the objective of reducing environmental impacts generated throughout the production and distribution cycle.

At its production sites, Sammontana monitors the quantities of waste generated with the aim of containing them and identifying management solutions that enhance recovery through established recycling chains. In addition, it manages obsolete refrigerated cabinets supplied to affiliated points of sale, ensuring that they are treated in accordance with current legislation, respecting the environment and people's safety.

In the production and distribution phase, edible waste is inevitably generated, mainly due to the complexity of processes and the constant pursuit of food quality and safety. Where rework of waste cannot be carried out, by-products are valorized and sent to specialized companies, subsequently mainly used for the production of biogas, which is then used to generate thermal and electrical energy.

With regards to waste linked to incoming food product packaging, Sammontana is committed to reduction, favoring solutions developed in collaboration with suppliers, such as reverse logistics and the use of reusable packaging.

Lastly, **hazardous waste** is present in limited quantities, equal to 1,102.892 tons, and is mainly attributable to the disposal of obsolete refrigerated cabinets collected from points of sale, classified as waste electrical and electronic equipment, or WEEE. No radioactive waste is present.

Table 17. Total amount of waste generated

Waste	UoM	2024	2025	Change
Quantity of waste generated	tons	12,123	14,825	2,702
Quantity of waste diverted from disposal	tons	11,625	12,682	1,056
Quantity of hazardous waste diverted from disposal	tons	501	1,103	601
Preparation for reuse[29]	tons	501	1,088	586

[29] Waste R12 and R13

Recycling[30]	tons	-	15	N/A
Quantity of non-hazardous waste diverted from disposal	tons	11,124	5,211	-5,912
Preparation for reuse[31]	tons	5,046	5,258	213
Recycling[32]	tons	6,078	5,259	-819
Other recovery operations[33]	tons	-	0.51	N/A
Quantity of waste directed to disposal	tons	498	2,143	1,645
Quantity of hazardous waste directed to disposal	tons	85	78	-7
Landfill	tons	-	-	-
Incineration[34]	tons	-	-	-
Other treatment types[35]	tons	85	78	-7
Quantity of non-hazardous waste directed to disposal	tons	413	437	24
Landfill	tons	144	0	N/A
Incineration	tons	269	0	N/A
Other treatment types[36]	tons	0	437	N/A
Quantity of waste for which destination is unknown	tons	0	0	N/A

During 2025, the Group generated a total of **14,825 tons of waste,** compared with **12,123 tons** in 2024. The growth in volumes is mainly attributable to the Group's corporate expansion and the related expansion of the reporting scope. Most of the waste generated consists of non-hazardous waste, mainly attributable to production process waste, managed as by-products where possible, and sludge from wastewater treatment processes.

Most waste produced in 2025 was sent to recovery, with 12,681.626 tons not directed to disposal, representing the largely prevailing share of the total. In particular, a significant portion was managed through preparation for reuse and recycling, both for hazardous waste and, above all, for non-hazardous waste. Disposal concerns a residual share, equal to 2,143.263 tons, and mainly involves non-hazardous waste. No waste was sent to landfill in 2025, while disposal operations mainly related to chemical-physical treatments.

30 Waste R3 and R4
31 Waste R12 and R13
32 Waste R3, R4 and R5
33 Waste R9
34 Waste D10
35 Waste D9 and D15
36 Waste D9 and D15

Social Disclosures

Own workforce

Table 18. Material impacts, risks and opportunities relating to own workforce (S1)

Material IROs in S1 – Own workforce
Impacts
Secure employment (own operations) – ACTUAL
Respect for and protection of working hours (own operations) – ACTUAL
Professional development and technical training initiatives (own operations) – ACTUAL
Promotion of freedom of association (own operations) – ACTUAL
Workplace accidents in production processes (own operations) – POTENTIAL
Lack of wage adjustments (own operations) – POTENTIAL
Incidents of discrimination (own operations) – POTENTIAL
Lack of promotion of freedom of association in US plants (own operations) – POTENTIAL
Partial coverage of foreign workers under collective agreements (own operations) – ACTUAL
Risks
Risk of legal proceedings following accidents in the production process (own operations)

The Group considered all people in its own workforce on whom material impacts could arise, namely direct employees, including personnel employed under permanent or fixed-term contracts, seasonal and temporary agency workers, self-employed workers and collaborators, and workers provided by third-party undertakings. All these categories were considered in the analysis process, as they may be subject to significant impacts arising from the undertaking's activities.

The Group identified material positive social impacts connected with the management of its own workforce, mainly attributable to employment stability, the protection of working conditions and skills development. In this context, the Group ensures structured and long-term employment relationships and promotes respect for contractual working hours and shifts, safeguarding work-life balance. A further positive impact derives from the provision of training and professional development initiatives, including cross-cutting and specialist pathways, technical modules and content on sustainability, diversity and inclusion, as well as tools supporting the use of company benefits. Training, delivered both in person and digitally, is supplemented by periodic updates based on feedback collected during individual and organizational dialogue, encouraging employees' active engagement in defining content. The Group also protects freedom of association in all operating sites.

Sammontana has also identified negative social impacts connected with its own workforce, for which safeguards are in place. Production activities involve significant human-machine interaction and the use of complex industrial systems, with risks, albeit limited, for workers' health and safety, including in relation to exposure to agents used in cooling processes.

Further critical areas concern the economic well-being of personnel, where misalignments between remuneration and the quantity and quality of work performed may arise, with effects on the recognition of experience and skills. The Group also identifies a potential risk of discrimination, connected with the absence of formalized policies on this topic, which could negatively affect the working environment and inclusion. With reference to employees in the United States, the Group operates in compliance with local legislation, which provides a more

limited level of protection of freedom of association and collective bargaining than in other geographical contexts, without currently adopting supplementary measures at Group level.
Lastly, any critical issues in workforce management may translate into financial risks for the Sammontana Group. In particular, in production activities, the occurrence of work-related accidents may result in significant financial burdens, including legal costs, compensation and possible negative effects on corporate reputation.

S1-1 – Policies related to own workforce

The Group has defined and adopted a comprehensive set of policies aimed at ensuring the protection of rights, the safeguarding of well-being, safety and integrity of its workforce, as well as promoting responsible conduct in line with corporate values across all operational activities. The policies outlined below represent key elements of the social management system and apply to the entire Group scope. The relevant policies are described in greater detail in paragraph ESRS 2 SBM-3, which includes the information required under GDR-P disclosure requirements.
The Group also relies on its **Sustainability Policy**, which sets out overarching principles and commitments applicable to workforce management. In particular, the policy promotes diversity, equity and inclusion within the organization. In addition, the Group's operating subsidiary, Sammontana S.p.A. Benefit Corporation, promotes a business model focused on people's well-being by structuring its strategy around thematic pillars and ensuring active employee engagement through training, internal communication and performance monitoring tools.
The **Human Rights Policy** integrates human rights into workforce management processes through due diligence activities aimed at identifying, preventing, mitigating and remediating potential adverse impacts. It adopts a zero-tolerance approach to child labour, forced labour, human trafficking, discrimination and harassment, while ensuring health, safety, fairness, inclusion and freedom of association.
The **Diversity, Equity and Inclusion Policy** defines the Group's approach to valuing individual differences and fostering a fair, inclusive and respectful working environment. It promotes equal opportunities for development, meritocracy and active listening, supporting the organization's cultural evolution through dedicated initiatives and the integration of DE&I principles into business processes.
The **Health and Safety Policy** sets out the Group's approach to protecting the health and physical integrity of individuals, integrating risk prevention into its ESG strategy. The policy includes systematic identification and management of risks, continuous employee training, performance monitoring and the ongoing improvement of working conditions, promoting a shared and participatory safety culture across all Group sites and activities.
The **Stakeholder Engagement Policy** defines the structured approach through which the Group ensures transparent, inclusive and continuous dialogue with its stakeholders, including its workforce. The systematic stakeholder mapping, including employees, and the assessment of related impacts, risks and priorities in line with the double materiality approach, integrating the insights gathered into decision-making processes, ESG strategy and business operations.
Finally, the **Whistleblowing Procedure** establishes a structured system for the receipt, management and assessment of reports concerning potential violations of the principles set out in the Legislative Decree 231 Organizational Model and applicable regulations. The procedure supports the timely identification of conduct that may generate negative impacts, including those affecting the workforce, such as discrimination, privacy breaches and violations of individual rights.

S1-2 – Engagement with own workforce and workers' representatives, existence of channels for own workforce to raise concerns or needs and approaches to remedy

Engagement

Sammontana promotes the active and continuous engagement of its own workforce through structured methods of direct interaction, aimed at listening, participation and dissemination of awareness regarding rights, working conditions and corporate values. Dialogue takes place both directly with workers and through trade union representatives[37] and is structured across the different stages of the professional journey. The Group maintains continuous dialogue with workers' representatives through structured discussion and consultation methods. In Italy, this dialogue takes place through the **Trade Union Representatives** (Rappresentanze Sindacali Unitarie (RSU)), which interact regularly with site management through periodic meetings, generally held monthly, aimed at sharing and discussing topics relating to working conditions, operational organization and employee well-being. The RSU also collects workers' concerns through trade union meetings, helping to ensure a two-way flow of information. Similar engagement mechanisms are adopted in the other countries in which the Group operates, where workers' representatives or equivalent figures collect and share feedback, needs and reports from the workforce with management. These are discussed in periodic meetings and considered in decision-making processes and improvement actions.

With regards to workers' engagement, the Group onboarding training sessions aimed at showing the Code of Ethics and the main rights and duties of workers, as well as periodic updates on safety, internal policies and corporate values, supplemented by specific pathways in the event of changes in role. In this context, the Group conduct annual training and discussion sessions focusing on rights, well-being and health, including an overview of welfare tools, supplementary pension schemes and the main contractual provisions. These initiatives include deep dives on maternity and paternity leaves, freedom of association, holidays and paid leave, and are accompanied by structured discussion sessions with the Human Resources team. The effectiveness of training content is also monitored through comprehension and satisfaction tests, the outcomes of which contribute to updating programmes and continuously improving engagement methods.

In parallel, Sammontana promotes periodic surveys aimed at monitoring the organizational climate and collecting feedback on Diversity, Equity & Inclusion policies, including open questions that enable employees to freely express their perspectives. Feedback collected is incorporated into annual Human Resources reviews and into the HR Department Improvement Plan, contributing to guiding organizational development decisions and actions.

With regards to the perspectives of potentially more vulnerable categories within the workforce, the Italian sites assess, where possible and compatibly with operational needs, the inclusion of people belonging to protected categories. However, once these individuals become part of the own workforce, they are not involved in specific engagement processes.

Remediation channels

In addition to the engagement channels mentioned above, the Group has adopted a system for collecting and managing employee reports. In particular, whistleblowing platform is in operation,

[37] With reference to engagement with workers' representatives, Sammontana does not currently have in place Global Framework Agreements specifically dedicated to human rights. However, these matters are addressed through existing instruments, including the Code of Ethics, the Legislative Decree 231/2001 Organizational, Management and Control Model, the Human Rights Policy, HR policies and procedures, as well as safety and inclusion management systems and the applicable collective bargaining agreements.

managed by an independent third party, which allows confidential reports to be submitted, including anonymously, in compliance with *Decreto Legislativo 24/2023* (Legislative Decree 24/2023), guaranteeing confidentiality and protection against any form of retaliation.
As a supplement to the formal reporting mechanism, Sammontana makes additional listening and dialogue tools available to employees. In particular, the Group uses the corporate intranet as an information channel, conducts annual organizational climate as well as Diversity, Equity & Inclusion surveys, and carries out structured feedback interviews on an annual basis, aimed at collecting observations and contributions useful for improving corporate practices.

Assessment of effectiveness

The effectiveness of reporting and listening channels is monitored through methods differentiated according to the tool. The whistleblowing channel, as well as any complaints, convictions and breaches of the 231 Model, are monitored quarterly by the Legal Department, based on analysis of the reports received. The effectiveness of the corporate intranet channel is assessed by monitoring the number of accesses, while the effectiveness of Diversity, Equity & Inclusion surveys is assessed through response rates. Structured feedback interviews also contribute to monitoring by systematically collecting qualitative evidence useful for continuous improvement. This approach enables the Group to continuously oversee material social topics and promptly identify any critical issues.
During financial year 2025, no reports were made to the Supervisory Body (in italian: *Organo di vigilanza*, or *OdV*), or through the whistleblowing channel. In the event of reports or identified critical issues, the Group activates structured management processes involving analysis of the concerns raised, engagement of the competent departments, including Human Resources, Compliance and the Legal Department, and, where necessary, adoption of corrective measures and process improvement actions.

S1-3 – Actions and resources related to own workforce

Sammontana has developed a structured set of actions aimed at preventing, mitigating and, where necessary, remediating negative impacts and strengthening positive impacts relating to its own workforce, consistently with the impacts, risks and opportunities identified in the materiality assessment. In particular, the actions address matters relating to health and safety, working conditions, professional development, diversity and inclusion, and the protection of workers' rights. The actions are implemented through the coordinated involvement of the Human Resources, HSE, Compliance and Management functions and are supported by dedicated organizational, technical and financial resources.

Actions already undertaken

Economic conditions and socio-economic well-being

- **Welfare and socio-economic support tools:** Italian sites adopt a structured corporate welfare plan aimed at supporting the socio-economic well-being of the workforce and preventing potential negative impacts on living and working conditions.
  The plan includes pension, healthcare and income support tools, parenthood support measures, discounts on company products, catering services and solutions for safe and sustainable mobility. In particular, in Italy, an initial assessment was launched during 2025 to extend the *Home-Work Travel Plan* to the San Giuliano Milanese and Jesolo sites, as already implemented at the Empoli, Vinci and Colognola sites.
  The Group's foreign sites have welfare plans that differ from country to country, which do not correspond to the structured welfare plan in place in Italy.

Welfare initiatives are aimed at strengthening engagement, attracting and retaining talent, inclusion, work-life balance and the organizational climate. The effectiveness of these welfare actions is monitored annually by the Human Resources and Sustainability departments through climate surveys, listening to interviews and analysis of HR trends, including turnover, absenteeism, requests for psychological support and satisfaction levels.

- **Remote working and work-life balance:** Structured remote working, for roles where it can be implemented, represents a key tool to promote organizational flexibility, reduce commuting, and improve employees' quality of life. During 2025, activities aimed at harmonizing implementation practices across the Group continued, with the adoption of common guidelines and monitoring systems based on HR KPIs and satisfaction surveys. Remote working is currently applicable across all Group sites; in order to ensure a consistent and uniform approach, a Group policy will be issued in 2026 to regulate its principles and implementation modalities. The effectiveness of these measures is monitored through both quantitative and qualitative indicators, including utilization rates, well-being feedback, and analyses of commuting data, where available. The results are shared internally and used to adjust initiatives on an annual basis and to define any new measures
- **Training and organizational culture:** In 2025, Sammontana Italia strengthened training sessions and the development of organizational culture at the Empoli, Colognola, and Vinci sites, ensuring 7 training days per year. Training activities focused in particular on occupational health and safety, human rights, quality and HACCP, as well as environmental protection.
- **Mental health and psychological well-being support:** In 2025, the collaboration with the Unobravo platform continued, offering online psychological support services, both individual and group sessions, as well as thematic workshops on stress management, work-life balance, and professional relationships. The initiative provided all Sammontana workers within the Italian scope (both fixed-term and permanent employees) with access to 4 free sessions, as well as a 10% discount on any additional sessions and a mechanism for renewing the free sessions upon contract renewal scheduled for May 2026. In addition, 2 online training webinars were delivered. At the beginning of 2026, the possibility of a pilot project to be extended internationally will be assessed, offering online psychological support services, both individual and group sessions, and thematic workshops on stress management, work-life balance, and professional relationships. Effectiveness is monitored through the service uptake rate.

Health and safety

- **Technological and plant engineering interventions to protect health and safety:** during 2025, the Group implemented technological and plant engineering interventions on production lines, with the aim of preventing work-related accidents, reducing operational risks and improving safety and ergonomic conditions in the workplace.
  With regards to these interventions, a distinction can be made between interventions carried out at Italian sites and those carried out at foreign sites.
  ***Italy*:** at Italian production sites, a structured plan of interventions to improve health and safety was developed, involving the technical and site functions. The main initiatives concerned the update of risk assessments, interventions on production lines and

targeted actions to manage the main operational risks, including mechanical risks, fire prevention, internal traffic and health surveillance.

In particular, a project was launched in 2025 at the Maser site, extended at year-end to the Jesolo plant and planned, from 2026, also for San Giuliano Milanese plant. In parallel, continuous improvement activities and maintenance of safety levels continued at the Empoli, Vinci and Verona sites, also through analysis of accident events and plant upgrades.

The interventions are aimed at strengthening safety levels, preventing accidents and progressively aligning sites with Group standards.

Foreign sites: at the Gelpat site, interventions were carried out to improve production processes and plant innovation, including replacing gas systems with integrated electrical equipment capable of managing mixing and heating phases more safely and efficiently. These actions helped improve operational safety and reduce risks connected with processing activities, while also supporting greater standardization and process control.

The effectiveness of interventions is monitored through safety indicators, HSE audits and analysis of accident events and near misses. In the case of the foreign plant, it is also monitored by verifying the actual integration of new plant solutions into production processes.

- **Health and safety training**: in Italy, Sammontana ensures mandatory training programs for new hires and periodic refresher training for existing personnel, in compliance with the State-Regions Agreement, BRCGS standards (Brand Reputation through Compliance Global Standards) and the results of the Risk Assessment. Training is aimed at reducing operational risks, promoting safe behaviors and ensuring high standards of food and industrial safety. Effectiveness is monitored through training records, post-training checks, HSE audits and analysis of accident and near-miss trends.

Diversity and inclusion

- **Awareness-raising program:** during 2025, the Group carried out an awareness-raising and training program (B DAY) on inclusion matters applicable to corporate contexts, with the objective of preventing discriminatory conduct and promoting respect for human rights and corporate values. The program, developed within the Italian scope, consisted of four meetings involving a total of 100 management participants, held at the Empoli site (in two sessions) and at the San Giuliano Milanese and Maser sites. Effectiveness is monitored through participation rates, qualitative feedback, observation of organizational behaviors and follow-up with the *Ambassador del Sorriso* ("Ambassadors of the Smile"). The program is also planned to continue in 2026, confirming the Group's commitment to this topic.
- **Monitoring of the gender pay gap:** in anticipation of the transposition in Italy and France of Directive (EU) 2023/970, the Group is reviewing its job evaluation processes and its approach to managing the pay gap. The pay gap metrics required by the Directive will be monitored during the first half of 2026 and, subsequently, an action plan may be defined to close any gaps identified. The Group will also assess the early adoption of internal pay transparency measures, not only at European level, where the obligation applies, but also globally.

Reporting and organizational dialogue

- **Protection channels:** in order to prevent and promptly identify any critical issues, the Group uses the whistleblowing platform described in chapter G1-1 – *Policies related to business conduct*.
- **Organizational dialogue and internal climate:** Sammontana promotes a culture of open dialogue and continuous improvement through structured listening tools. During 2025, through a survey, the Group mapped the perceptions of the corporate population regarding the Group's management of equity matters, with reference to the Italian scope. The results show an overall positive perception of inclusion, which represents strength, with limited levels of disagreement and a high level of sharing of inclusive values. However, areas for improvement emerged in relation to the strategic enhancement of diversity and mechanisms for promoting reporting, which are perceived as not yet fully consolidated. The most critical area concerns the perception of equity, with signs of a sense of unfairness and limited meritocracy that could affect engagement and trust in the organization. The effectiveness of the action is monitored through indicators such as survey results, participation levels and qualitative employee feedback. The outcomes contribute to the evolution of initiatives, also in view of the adoption of the Great Place to Work model starting from 2026.

S1-4 – Targets related to own workforce

Consistently with its approach to responsible human capital management, Sammontana has defined a set of targets aimed at preventing, mitigating and managing the impacts, risks and opportunities identified in relation to its own workforce. The targets apply to the entire Group scope and cover the relevant areas, including health and safety, working conditions, skills development, diversity and inclusion, and organizational well-being. The targets are defined based on internal analyses, survey results, HR and HSE monitoring systems, and regulatory and voluntary references adopted by the Group. They are monitored through quantitative and qualitative indicators subject to periodic review.

- **Dialogue and feedback:** At Italian sites, a performance and skills assessment system is implemented for all white-collar personnel[38]. The results of this system form the basis for defining training needs. The Group aims to extend the assessment system for white-collar workers to foreign sites by 2026 and to ensure full workforce coverage in Italy through a unified intranet platform that will also cover the new Maser, Jesolo and San Giuliano Milanese sites. The target contributes to improving organizational well-being and the quality of the working environment, strengthening listening and engagement mechanisms.
- **Inclusion and gender equality (DE&I):** The Group aims to systematically strengthen the principles of inclusion and equal treatment by launching a gender equality assessment[39] in 2026, with the objective of obtaining the related certification by the end of 2027.
- **Mental health and psychological well-being support:** In the area of mental health and psychological well-being, in 2025 the Group initiated a preliminary assessment to extend

[38] "White-collar staff" refers to employees with the level of middle management and employee.
[39] The gender equality assessment involves assessing the organization's level of maturity in the field of gender equality, based on the analysis of KPIs and policies and processes, in particular related to workforce composition, pay equity, career development, governance and corporate culture.

psychological support services to international operations, with the objective of completing their implementation at Group level.

- **Workplace safety, technology, ergonomics and training:** The Group is structurally committed to continuously improving occupational health and safety levels by enhancing the analysis of accidents and near misses, completing production lines aimed at improving safety and ergonomics, and continuously updating the Risk Assessment and training programs. The objective is defined based on HSE analyses, internal audits, technical and plant assessments, applicable regulatory requirements, and internal benchmarks across sites.
- **Remote working and work-life balance:** The Group aims to harmonize remote working policies across its companies by 2026, adopting common guidelines and KPIs at Group level. The goal is to promote work-life balance, employee well-being, and a consistent, inclusive organizational culture.
- **Welfare tools and socio-economic support:** During 2026, the welfare provisions set out in the existing trade union agreements at each Group site will continue to apply. In Italy, access to corporate welfare services and initiatives remains subject to employees' voluntary choice to convert, in whole or in part, their accrued performance bonus, in accordance with the terms and limits defined in the agreements. In 2026, the concrete implementation of the objective to extend the Home-Work Travel Plan to the San Giuliano Milanese and Jesolo sites is also planned. The objective aims to strengthen socio-economic protection and quality of life for employees, in line with HR and sustainability policies.
- **Training and organizational culture:** In relation to the objective of extending the training plan and developing organizational culture, in 2025 Sammontana increased the number of training days at the three sites of Empoli, Colognola, and Vinci from 6 to 7, fully achieving the predefined target.
- **Internal communication and continuous dialogue:** The Group aims to further strengthen internal communication channels and continuous listening activities, starting in 2026, through a dedicated employee well-being survey conducted in collaboration with Great Place to Work[40]. The survey will aim to measure the experience of each category of employees with respect to the three key dimensions of the Great Place to Work Model: trust, pride, and cohesion. Additional initiatives include meetings with blue-collar employees, the creation of dedicated newsletters, and periodic meetings between managers and employees to assess organizational well-being beyond operational matters. The objective is defined based on the "one company" cultural integration path and relevant international standards (Trust Index).

Table 19. Own workforce targets

Target topic	Target value or level	Baseline and reference year	Target deadline
Dialogue and feedback	Structured evaluation system for 100% of the Groups white-collar employees	2024: feedback system launched based on a manager-team discussion model for Italian sites	By 2026

[40] The Great Place to Work certification is a recognition that arises from the evaluations of the employees themselves and that the company assigns on the basis of a monitoring and analysis process, built according to a methodology based on two tools: Trust Index Employee Survey and Culture Audit

	100% of employees reached through a single Intranet platform	2024: Intranet active for the Sammontana workforce, excluding the new 2026 scope: extension to new Italian sites (Maser, Jesolo, San Giuliano Milanese)	2024: Intranet active for the Sammontana workforce, excluding the new 2026 scope: extension to new Italian sites (Maser, Jesolo, San Giuliano Milanese)
Diversity, Equity & Inclusion (DE&I)	Achievement of UNI/PdR 125 certification	2024: not certified; introduction of organizational DE&I models to be assessed through gap analysis	2026: gender equality assessment 2027: certification obtained
Mental health and psychological wellbeing support	Extension of psychological support services to the entire Group	2024: psychological support available in Italian offices	By 2027
Workplace safety, technology, ergonomics and training	Extension of the accident and near miss analysis system across the entire Group	2024: monitoring system active only in three sites (Empoli, Vinci, Colognola)	2025: achieved
Remote working and work-life balance	Extension of remote working policies to all Group companies	2024: differentiated application of remote working across Group sites	By 2026
Welfare and social-economic support	Extension of the Home–Work Travel Plan to the San Giuliano Milanese and Jesolo sites	2025: preliminary discussion working groups initiated	By 2026: further analysis and involvement of stakeholders; drafting of the PSCL for the San Giuliano Milanese and Jesolo sites
Training and organizational culture	Increase and extension of the training plan for the Empoli, Colognola and Vinci sites	2024: 6 dedicated training days	2025: 7 dedicated training days achieved
Internal communication and continuous listening	Introduction of new survey tools (Great Place to Work questionnaire, targeted listening initiatives) and integration of results into the Group-wide Great Place to Work programme	2025: introduction of new tools for wellbeing and climate surveys and active listening initiatives (RSU meetings, employee–manager meetings), not yet integrated into the GPtW framework	By 2026

S1-5 – Characteristics of the undertaking's employees

This paragraph illustrates the main characteristics of the Group's workforce in detail, presenting quantitative data expressed in terms of average headcount[41], with breakdowns by gender,

[41] Employees who are directly employed by the Group under an employment relationship, whether on a permanent or fixed-term basis, including seasonal workers, regardless of their working time arrangement, excluding employees on zero-hour contracts. The use of the average headcount also makes it possible to represent more accurately the

contract type and country. Information is also provided on the turnover rate and on the methodologies adopted for data collection and processing. The data was collected through completion of a file shared by email with the various Personnel Administration and Human Resources departments of the individual companies and sites.

Average headcount represents the average number of people employed by the Group during the financial year and is calculated as the average number of employees in the reporting period. The metric includes all workers on an individual basis, irrespective of working hours or contractual arrangement. In 2025, the number of employees[42] of the Sammontana Group, expressed as average headcount, was 2,922, of whom approximately 80% were employed in Italy.

Table 20. Employees by gender

Employees by gender	UoM	2024	UoM	2025
Male	FTE[43]	1,425	HEAD[44]	1,869
Female	FTE	668	HEAD	1,053
Total	FTE	2,093	HEAD	2,922

Table 21. Employees by country

Employees by country	UoM	2024	UoM	2025
Italy	FTE	1,821	HEAD	2,337
France	FTE	94	HEAD	96
USA	FTE	178	HEAD	161
Switzerland	FTE	-	HEAD	16
Germany	FTE	-	HEAD	18
Canada	FTE	-	HEAD	294
Total	FTE	2,093	HEAD	2,922

Table 22. Employees by contract type

Employees by contract type[45]	UoM	2024		UoM	2025	
		Male	Female		Men	Women
Permanent contract	FTE	1,374	627	HEAD	1,679	807
Temporary contract	FTE	51	41	HEAD	190	246
Total	FTE	1,425	668	HEAD	1,869	1,053

Table 23. Employees by contract type[46]

Permanent and Temporary employees[47]	2025		
	UoM	Male	Female
Full-time employees	HEAD	18	109
Part-time employees	HEAD	1,851	944

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composition of the workforce during the year, also including the component of seasonal workers, which is particularly important for the Group. The methodological change leads to limited comparability with the 2024 data, which were expressed in FTEs; therefore, a year-on-year change is not presented.

42 Employees who have a direct employment relationship with the Group, whether on a permanent or fixed-term basis, including seasonal workers, regardless of the applicable working time arrangement, excluding employees on zero-hour contracts.

43 FTE: Full-time equivalent

44 Average headcount

45 Employees on zero-hour contracts are excluded from the metric.

46 Part-time and full-time employees of Bindi North America Inc. are not included in the calculation.

47 Part-time and full-time employees of Bindi North America Inc. are not included in the calculation.

During 2025, the employee turnover rate was calculated based on the number of employees. Against a total workforce of 2,922 employees, 213 exits were recorded during the period[48], of which 78 were voluntary. The overall turnover rate was therefore 7.29%, calculated as the ratio between the total number of employees who left the undertaking during the period and the total number of employees. The indicator makes it possible to monitor workforce renewal and workforce stability during the reporting period

Table 24. Employees hires and terminations

Number of hires and terminations	UoM	2025	
		Men	Women
Hires	HEAD	133	63
Terminations	HEAD	147	66

S1-6 – Characteristics of non-employees in the undertaking's own workforce

During the reporting year, the Sammontana Group employed approximately 915 non-employees[49]. Non-employees are understood as temporary agency workers, trainees or interns, as well as any self-employed workers who provide their work directly to the Group in a manner similar to own workforce. Workers of suppliers or external contractors operating within the Group's value chain are not included, such as those carrying out occasional services and maintenance activities on equipment and capital goods.

S1-7 – Collective bargaining coverage and social dialogue

The Sammontana Group operates in different countries and regulatory contexts, adopting a consistent and responsible approach to managing industrial relations and protecting the rights of its own workforce. In the countries of the European Economic Area, the Group fully applies the relevant collective bargaining agreements, guaranteeing high coverage of employees and working conditions aligned with applicable regulations and sector practices.

With reference to financial year 2025, following the extension of the reporting scope to the entire Group, employees covered by collective bargaining agreements amounted to 2,761 out of a total of 2,922 employees, with a coverage rate of 94.49%

Table 25. Number and percentage of employees covered by collective bargaining agreement

Employees covered by collective bargaining agreements	UoM	2024[50]	UoM	2025
Number of employees covered by collective bargaining agreements	FTE	1915	HEAD	2.761
Number of employees	FTE	2093	HEAD	2.922
Coverage rate	%	91,49%	%	94,49%

In the European countries in which the Group is present, Sammontana applies the main sector collective bargaining agreements:

[48] Total number of terminations of employees with permanent contracts
[49] The total number of non-employee workers, excluding trainees and interns, amounts to 904.
[50] In the 2024 financial year, the figure was reported only in relation to employees in the European Economic Area, as required by the version of the ESRS Standards previously applied.

- in Italy, the National Collective Bargaining Agreement for the Food Industry (Contratto Collettivo Nazionale di Lavoro dell'Industria Alimentare);
- in France, the relevant collective agreements (Convention collective des industries alimentaires (IDCC 3109);
- in Germany, German collective agreements (Tarifverträge);
- in Switzerland, LGAV-type collective agreements.

In countries outside the European Economic Area, the framework is more heterogeneous: in the United States there is no applicable collective bargaining system, while in Canada company-level collective bargaining agreements are in force.

The change in the collective bargaining coverage rate recorded in 2025 is attributable to regulatory differences between the countries in which the Group operates and not to changes in industrial relations policies or practices. In contexts where collective bargaining is structurally provided for and consolidated, namely the European countries where the Group operates, Switzerland and Canada, coverage levels are equal to 100%. The share of workers not covered is entirely attributable to the United States, where the regulatory framework does not provide for collective bargaining systems applicable to the Group's scope. The change observed compared with 2024 therefore exclusively reflects regulatory context factors and not a reduction in worker protection standards.

In 2025, the Sammontana Group monitored the presence of workers' representatives in its sites as a relevant element of the industrial relations system. With reference to the reporting scope, the number of employees working in sites covered by workers' representation amounted to 2,688, out of a total of 2,922 employees, corresponding to a coverage rate of 91.31% at Group level.

In particular, in 2025 employees operating in the United States, Switzerland, Germany and France for Bononia SAS, Les Experts Patissiers SAS and Dakana Services SAS are not represented, while employees of Gelpat Tradition SAS are represented. The observed distribution reflects the regulatory, contractual and size-specific characteristics of the different national contexts in which the Group operates.

Table 26. Number and percentage of employees represented by workers' representatives

Employees represented by workers' representatives	UoM	2024[51]	UoM	2025
Number of employees working in sites with workers' representatives	FTE	1,915	HEAD	2,688
Number of employees	FTE	2,093	HEAD	2,922
Coverage rate	%	91.49%	%	91.31%

Table 27. Percentage of employees represented by workers' representatives by country

Coverage percentage	Countries
0-19%	United States, Switzerland, Germany
20-39%	France

[51] In the 2024 financial year, the data was reported only in relation to employees within the European Economic Area, in line with the version of the ESRS Standards previously applied.

40-59%	-
60-79%	-
80-100%	Italy, Canada

With reference to representation tools at European level, the Sammontana Group is not subject to the obligation to conclude agreements with its employees for the establishment of a European Works Council, EWC, or other equivalent bodies. This obligation does not apply because the Group does not meet the minimum requirement of 150 employees in at least two Member States of the European Union.

Dialogue with workers is therefore mainly managed at national level, consistently with the industrial relations systems and regulatory frameworks of the countries in which the Group operates.

S1-8 – Diversity metrics

Within the top management scope, with reference to the composition of the Board of Directors, the Sammontana Group monitors specific gender diversity metrics in order to ensure adequate balance in representation at the highest decision-making levels. For the purposes of this disclosure, "top management" or "senior management" means the two organizational levels immediately below the administrative and supervisory bodies. In particular, the top management scope includes members of the management team (Board of Management or equivalent) and executives reporting directly to these figures.

In 2025, the Group's top management consisted of 93 members overall, of whom 65 were men and 28 were women. In percentage terms, men represented 70% of the total, while women represented 30%

Table 28. Composition of top management

Composition of top management	UoM	2025
Male	HEAD	65
	%	70%
Female	HEAD	28
	%	30%
Total	HEAD	93

S1-9 – Adequate wages

The Sammontana Group assesses the adequacy of remuneration paid to its employees by reference to benchmarks consistent with the regulatory and contractual context of the countries in which it operates. In European Union countries, the main reference parameter consists of the wage levels established by national sector collective bargaining agreements, as well as, where applicable, the legal minimum wage provided for under current legislation, consistently with the principles set out in Directive (EU) 2022/2041 on adequate minimum wages. In non-EU countries, wage adequacy is assessed based on legal minimum wages or wage levels provided for by local collective bargaining agreements, ensuring compliance with the provisions in force in the respective contexts.

On the basis of these parameters, the Group verifies that the lowest wage level applied is at least equal to the minimum levels provided for by applicable legislation or collective bargaining agreements in the respective contexts. All Group employees receive remuneration equal to or higher than the minimum levels provided for by applicable legislation or collective bargaining agreements.

This management approach enables the Group to ensure compliance with current regulatory requirements and to guarantee remuneration conditions consistent with the reference contexts in the different countries in which it operates.

S1-10 – Social protection

The Sammontana Group ensures that its employees have access to social protection systems covering key life events related to employment, in accordance with the regulatory and contractual frameworks of the countries in which it operates. In particular, the Group's employees are covered by social protection systems with reference to sickness, unemployment, work-related accidents, disability and maternity leave. In 2025, 100% of the Group's employees were covered by at least one social protection system for each of the categories indicated above, through public, contractual or corporate systems, depending on the applicable regulatory context in the different countries. In European Union countries and in Canada, social protection is mainly guaranteed through public systems and collective bargaining. In the United States, coverage is ensured through a combination of public programmes and mandatory insurance systems, such as workers' compensation, as well as, where applicable, instruments provided for under federal and state legislation.

S1-12 – Training and skills development metrics

During 2025, the Sammontana Group continued its training and skills development initiatives for its own workforce, recognizing training as a strategic lever for professional growth and strengthening human capital. In financial year 2025, the Group delivered a total of 12,964 training hours, with an average of 4.4 training hours per employee. Training activities are aimed at strengthening technical, professional and transversal skills and form part of a broader continuous development pathway for people, consistently with the Group's organizational needs and growth objectives.

During the same period, 792 employees participated in formalized performance and career development reviews, corresponding to 27% of the corporate population. The figure includes all employees who received a periodic assessment during 2025, including those no longer employed as at 31 December 2025.

Table 29. Training skills and development metrics

Training and development in FY2025	UoM	Male	Female	Total
Total employees	HEAD	1,869	1,053	2,922
Number of employees who participated in formalised performance and career development reviews	HEAD	477	315	792
Percentage of employees participating in formalised performance and career development reviews	%	26	30	27
Total training hours	Hours	8,892	4,072	12,964
Average number of training hours per employee	Hours	4.76	3.87	4.4

S1-13 – Health and safety metrics

Protecting workers' health and safety is a priority for the Group, which is committed to ensuring safe working environments and promoting a culture of prevention at all levels. Data below relate to the coverage of own workforce by the health and safety management system, the work-related accident rate, cases of work-related ill health and the number of days lost due to work-related accidents. In 2025, 76% of the Group's own workforce was covered by health and safety management systems, compared with 84% in 2024. Partial worker coverage is attributable to the fact that only employees are currently covered by this management system.

During the reporting period, no fatalities connected with work activities occurred either among the Group's workers or among non-employee workers operating at the Group's sites or activities.

In line with ESRS S1-13, Sammontana calculates the work-related accident rate by dividing the number of cases recorded by the total number of hours worked by the entire workforce, then multiplying the result by 1,000,000. During 2025, the number of work-related accidents increased compared with the previous year, from 82 to 100 cases. However, this increase was accompanied by a significant increase in hours worked, which led to a reduction in the accident rate, from 25 to 22 per million hours worked. The decrease in the accident rate highlights a relative improvement in health and safety performance, suggesting greater effectiveness of the prevention measures adopted by the Group, against the backdrop of the expansion of operating activities and the increase in the workforce

Table 30. Number and rate of recordable work-related accidents

Accidents involving own workforce[52]	2024	2025	Variation
Number of cases	82	100	18
Total number of hours worked by own workers	3,345,948	4,646,712	1,300,764
Work-related accident rate based on 1,000,000 hours worked	25	22	-3
Number of days lost due to work-related accidents and fatalities from accidents	2,036	2,843	807

In 2025, 2 cases of work-related ill health and 403 related lost days were recorded.

S1-14 – Work-life balance metrics

The Group guarantees all employees, equal to 100% across the entire corporate scope, **the right to family leave**, consistently with the regulatory and contractual frameworks in force in the countries in which it operates. The methods of access, duration and economic conditions of leave are defined in compliance with applicable national legislation and collective agreements, ensuring that workers have adequate safeguards supporting work-life balance.

S1-15 – Remuneration metrics

The Sammontana Group monitors remuneration dynamics within its own workforce in order to ensure fairness, transparency and consistency with the principles of equal opportunities and

[52] Non-employee workers operating at company sites are therefore excluded

non-discrimination. In this context, particular attention is paid to the analysis of the gender pay gap and the distribution of remuneration among employees.

Table 31. Group gender pay gap and by country with more than 250 employees[53]

Gender pay gap		UoM	2024	2025
Group percentage gap[54]		%	**20%**	**20%**
Average gross hourly pay level	Male	€	21,93	22,94
	Female		17,62	18,38
Percentage gap in Italy		%	**22%**	**20%**
Average gross hourly pay level	Male	€	22,54	24,66
	Female		17,63	19,73
Percentage gap in Canada		%	**11%**	**7%**
Average gross hourly pay level	Male	€	14,68	14,54
	Female		13,09	13,59

The following table reports, for financial year 2025, data relating to employees' total annual remuneration, disaggregated by individual site and Group company, since it is not currently possible to extract aggregated and consolidated data.

Comparative data for financial year 2024 are not available, as changes occurred in the reporting *scope* that do not allow a homogeneous and reliable reconstruction of the metrics for the previous year.

Table 32. Ratio between the total annual remuneration of the highest-paid individual and the median total annual remuneration of all employees (excluding the highest-paid individual)

Ratio of highest to median employee pay gap	UoM	2025
Empoli		
Total annual remuneration of the highest-paid individual	€	283,718.00
Median total annual remuneration of all employees, excluding the highest-paid individual		47,716.29
Total annual remuneration ratio[55]	No.	5.95
Colognola		
Total annual remuneration of the highest-paid individual	€	116,045.00
Median total annual remuneration of all employees, excluding the highest-paid individual		35,647.44
Total annual remuneration ratio	No.	3.26
Vinci		
Total annual remuneration of the highest-paid individual	€	100,267.00
Median total annual remuneration of all employees, excluding the highest-paid individual		34,485.65
Total annual remuneration ratio	No.	2.91
Transfrigo		
Total annual remuneration of the highest-paid individual	€	47,474.00

[53] The disclosure of the percentage gap calculated at country level is a requirement under B Corp certification.
[54] The percentage gap is calculated as follows: [(average gross hourly remuneration of men – average gross hourly remuneration of women) / average gross hourly remuneration of men] × 100
[55] The ratio is calculated by dividing the median total annual remuneration for all employees (excluding the remuneration of the highest-paid individual) by the total annual remuneration of the highest-paid individual.

Median total annual remuneration of all employees, excluding the highest-paid individual		33,433.99
Total annual remuneration ratio	No.	1.42
Jesolo		
Total annual remuneration of the highest-paid individual	€	64,073.00
Median total annual remuneration of all employees, excluding the highest-paid individual		32,844.00
Total annual remuneration ratio	No.	1.95
Maser		
Total annual remuneration of the highest-paid individual	€	306,269.00
Median total annual remuneration of all employees, excluding the highest-paid individual		33,479.00
Total annual remuneration ratio	No.	9.15
San Giuliano Milanese		
Total annual remuneration of the highest-paid individual	€	140,921.23
Median total annual remuneration of all employees, excluding the highest-paid individual		35,572.76
Total annual remuneration ratio	No.	3.96
Bindi NA		
Total annual remuneration of the highest-paid individual	€	335,015.85
Median total annual remuneration of all employees, excluding the highest-paid individual		48,012.31
Total annual remuneration ratio	No.	6.98
La Rocca		
Total annual remuneration of the highest-paid individual	€	319,300.00
Median total annual remuneration of all employees, excluding the highest-paid individual		55,502.00
Total annual remuneration ratio	No.	5.75
Gelpat		
Total annual remuneration of the highest-paid individual	€	72,794.55
Median total annual remuneration of all employees, excluding the highest-paid individual		23,138.47
Total annual remuneration ratio	No.	3.15
Bononia		
Total annual remuneration of the highest-paid individual	€	265,067.00
Median total annual remuneration of all employees, excluding the highest-paid individual		56,037.00
Total annual remuneration ratio	No.	4.73
Dakana		
Total annual remuneration of the highest-paid individual	€	31,973.57
Median total annual remuneration of all employees, excluding the highest-paid individual		24,845.91
Total annual remuneration ratio	No.	1.29
Les Experts Patissiers		
Total annual remuneration of the highest-paid individual	€	36,864.94
Median total annual remuneration of all employees, excluding the highest-paid individual		23,621.74
Total annual remuneration ratio	No.	1.56
Bindi DEU		
Total annual remuneration of the highest-paid individual	€	215,019.46
Median total annual remuneration of all employees, excluding the highest-paid individual		74,937.01
Total annual remuneration ratio	No.	2.87
Forno e +		

Total annual remuneration of the highest-paid individual	€	1,180,753.73
Median total annual remuneration of all employees, excluding the highest-paid individual		46,000.00
Total annual remuneration ratio	No.	25.67

S1-16 – Incidents of discrimination and other human rights incidents

During the reporting period, **no reports of workplace discrimination were received through the channels available to employees**, including the reporting and whistleblowing mechanisms adopted by the Group. Furthermore, no human rights incidents connected with own workforce were identified. In the absence of such events, there were no sanctions, fines or compensation attributable to human rights violations or discrimination against employees during the reporting period.

Workers in the value chain

Table 33. Material impacts, risks and opportunities relating to workers in the value chain (S2)

Material IROs in S2 – Workers in the value chain
Impacts
Employment insecurity (upstream and downstream) – POTENTIAL
Lack of wage adjustment (upstream and downstream) – POTENTIAL
Working time violations (upstream and downstream) – POTENTIAL
Restrictions on workers' freedom of association across the value chain (upstream) – POTENTIAL
Breaches of contractual conditions (upstream and downstream) – POTENTIAL
Adverse health and safety outcomes in production processes (upstream and downstream) – POTENTIAL
Incidents of discrimination (upstream and downstream) – POTENTIAL
Human rights violations (upstream) – POTENTIAL
Risks
Risk of production interruption due to strikes at third-party companies (upstream)

The double materiality assessment identified, with reference to workers in the value chain, a series of potential negative impacts relating to working conditions and respect for human rights, mainly located in upstream activities and, to a lesser extent, downstream.

In particular, the main potential impacts concern aspects such as employment uncertainty, failure to provide an adequate wage, respect for working time, freedom of association, health and safety in production processes, and the risk of discrimination episodes. In specific geographical and sectoral contexts, particularly in certain agricultural and manufacturing segments of the non-EU supply chain, the Group also identified higher exposure to human rights risks, including potential cases of child labour and forced labour. These impacts are mainly attributable to potential shortcomings in suppliers' failed management and control systems, which may limit the Group's ability to prevent and mitigate non-compliant labour practices along the supply chain.

From a financial and operational perspective, these critical issues may translate into legal and reputational risks arising from non-compliant conduct by suppliers, as well as risks of operational discontinuity, for example in the event of service interruptions or strikes at third-party entities.

In order to strengthen the identification, assessment and management of these risks and impacts, the Group launched a structured Human Rights Risk Assessment (HRRA), the results of which are described in section S2-3.

S2-1 – Policies related to workers in the value chain

The Sammontana Group has adopted a comprehensive set of policies and procedures that contribute to overseeing risks and mitigating potential negative impacts on workers in the value chain, with particular reference to the upstream supply chain. These instruments regulate relationships with suppliers and business partners, defining expectations for responsible conduct, operational requirements and prevention and control mechanisms. For further information on corporate policies, including stakeholder engagement and references to standards, certifications or third-party initiatives, reference is made to Disclosure Requirement SBM-3 in the General Disclosures chapter.

The **Supplier Code of Conduct** defines the reference principles for responsible supply chain management, promoting respect for human rights, working conditions and respect for the dignity of individuals. By extending minimum requirements to suppliers and supply chain partners, the Code helps prevent unethical practices along the value chain and protect workers in the value chain.

The **Human Rights Policy** formalizes the Group's commitment to preventing, mitigating and remediating potential negative impacts on human rights across the entire value chain, including suppliers, business partners, contractors and potentially affected communities. The policy refers to the adoption of human rights due diligence processes aimed at identifying and managing social risks connected with upstream activities. In relation to workers in the value chain, the document constitutes the main reference for mitigating risks relating to child labour, forced labour, discrimination, health and safety, and freedom of association, providing a clear framework of expectations also for procurement processes.

The Group's **Stakeholder Engagement Policy** defines a structured and continuous process of dialogue with relevant stakeholders along the value chain, including suppliers, business partners and other upstream actors. With reference to workers in the value chain, the policy provides the framework for collecting social concerns and reports connected with sourcing activities, supporting the prevention and mitigation of potential indirect social impacts. Dialogue with supply chain stakeholders also contributes to integrating social matters into business processes, particularly risk assessment, updating materiality assessments and progressively improving supply chain practices.

Implementation of the policies is supported by control and monitoring mechanisms, including supplier qualification and assessment processes, audit activities, training initiatives and reporting tools aimed at verifying compliance with requirements and managing any non-conformities.

In specific operating contexts, certain Group companies also adopt reference operating standards to strengthen the application of the principles described above along the supply chain. These tools are described in section S2-3 on actions.

S2-2 – Engagement with workers in the value chain, existence of channels for workers in the value chain to raise concerns or needs and approaches to remedy

The Sammontana Group adopts a structured approach to engagement with the value chain, aimed at integrating, as far as possible, the perspectives of workers into the management of social impacts. Considering the indirect nature of the relationship with supply chain workers, engagement mainly takes place through interactions with suppliers and, where applicable, with their qualified representatives, considered capable of reflecting the operating conditions and main needs of workers employed along the value chain. With reference to the formalization of agreements with workers' representatives along the value chain, the Group does not have Global Framework Agreements (GFAs) or other specific agreements concluded with representatives of supply chain workers.

Respect for workers' rights along the value chain is promoted through the adoption and application of corporate policies, including the Supplier Code of Conduct and Human Rights Policy, as well as through supplier monitoring and engagement activities.

The Group carries out these engagement activities through structured tools, including supplier assessment processes, thematic questionnaires and dedicated discussion sessions with strategic suppliers. During 2025, this approach was also implemented through the organization of a workshop dedicated to supply chain sustainability, aimed at collecting information on diversity and inclusion, circular models and emissions reduction. The workshop involved several departments of suppliers that could represent the procurement scope. The initiative made it possible to collect useful evidence regarding suppliers' organizational capabilities and main operational criticalities, helping to guide subsequent support and improvement activities along the value chain.

The Group does not directly engage with workers in the value chain who may be more vulnerable or exposed to specific impacts. However, it also makes remediation channels available to external parties, including workers in the value chain, through which any violations or critical issues relating to human rights and working conditions can be reported, including anonymously. These reports are managed according to formalized procedures that guarantee confidentiality and protection against any retaliation. Where reports are made or critical issues are identified as part of monitoring activities, the Group activates specific verification actions and, where necessary, requires suppliers to adopt corrective measures, monitoring their implementation. In more significant cases, further measures may be adopted, up to and including review of the business relationship.

For further information on remediation channels, reference is made to chapter G1-1 – *Policies related to business conduct*.

S2-3 – Actions and resources related to workers in the value chain

The Sammontana Group has implemented a set of actions aimed at preventing, mitigating and managing potential negative impacts on workers along the value chain, with particular reference to upstream activities. These actions are consistent with the risks and impacts identified in the double materiality assessment and form part of the broader human rights due diligence system. The actions described are implemented with the involvement of the Procurement, Sustainability and Quality departments and are supported by digital tools for data collection and analysis along the supply chain. The activities are integrated into business processes and are subject to continuous monitoring, with a view to progressively improving the supply chain management system. It should be noted that, during financial year 2025, no human rights incidents were reported along the value chain.

Actions already undertaken

- **Responsible supply chain management system and engagement initiatives:** The Group has developed a structured system for responsible supply chain management, aimed at assessing, monitoring, and improving suppliers' ESG performance, including aspects related to working conditions and workers' rights throughout the value chain. In 2025, the system included the distribution of thematic ESG questionnaires to suppliers representing approximately 80% of the total procurement value in Italy, with the objective of collecting comparable information on environmental, social, and governance profiles. The information collected was used to assess suppliers' maturity levels and to cluster them, in order to identify key risk areas and intervention priorities. The system is not limited to the assessment phase but develops into a structured path of engagement and collaboration with suppliers. In this context, in November 2025 a workshop on supply chain sustainability was organized, involving representative suppliers and professionals from various company departments (including quality, sustainability, safety, procurement, and research and development). The initiative made it possible to gather evidence on key operational and organizational challenges faced by suppliers, including limited technical and digital skills, high workloads, and difficulties in data management. These elements are also relevant in relation to working conditions, as they may indirectly affect work organization and employee well-being. The system is ongoing in nature and is being progressively extended to the broader Group scope in 2026. The effectiveness of this action is monitored through indicators such as supplier participation rates in assessment activities, the quality and completeness of collected data, participation in engagement initiatives (workshops), and the evolution of ESG scores assigned to suppliers. Finally, through the dialogue with suppliers described above, the need to strengthen support on the most relevant environmental topics for the supply chain was identified. Therefore, in 2025, the multistakeholder project "**Decarbon Club**" was launched to support suppliers in reducing emissions along the supply chain. The initiative includes the development of a dedicated tool for measuring Scope 3 emissions, with a first operational step planned for November 2026.

- **Human rights risk analysis:** In 2025, the Group launched a structured Human Rights Risk Assessment (HRRA) process aimed at identifying, assessing, and prioritizing potential negative impacts on workers along the value chain. The process, currently under development and gradual implementation, represents one of the key tools of the Group's human rights due diligence system and is based on a risk-based approach. The analysis includes: the preliminary identification of risks through document analysis, sector benchmarks, and targeted research; the assessment of risks based on severity and likelihood criteria; the analysis of the Group's level of involvement (cause, contribution, or direct linkage); and the engagement of relevant stakeholders, including suppliers, through dedicated surveys. The results of the analysis will feed into an overall risk mapping (*heatmap*), enabling the identification of priority issues and guiding subsequent mitigation actions, including the definition of specific action plans for the most exposed suppliers.

S2-4 – Targets related to workers in the value chain

Within the framework of its sustainability strategy and human rights due diligence system, the Sammontana Group has defined a set of voluntary objectives aimed at preventing and mitigating potential negative impacts on workers along the value chain, with particular reference to upstream procurement activities, and at progressively strengthening the Group's ability to identify, monitor, and manage social risks within the supply chain. These objectives are consistent with the Supplier Code of Conduct, the Human Rights Policy, and the responsible supply chain management system, which requires business partners to adhere to the Group's principles, implement due diligence systems, and cooperate in audit, monitoring, and remediation processes. In line with the maturity level of the Group's monitoring system, some objectives are currently qualitative in nature but are nonetheless measurable over time and monitored through operational indicators, in accordance with ESRS provisions.

- **Maintaining the share of sourcing from certified supply chains**: The Group has defined a continuous goal to maintain and increase the share of spending on raw materials sourced from certified and recognized supply chains, in line with the Sustainability Policy and the responsible supply chain management system. This goal is also relevant for S2 purposes, as such certification schemes include, depending on the standard applied and in different measures, requirements related to human rights, working conditions, health and safety, traceability, and third-party verification. The goal is measured as the percentage of total raw material expenditure covered by certification schemes such as Organic, Fairtrade/CTM, Rainforest Alliance, RSPO, ISCC PLUS, and cage-free eggs. The scope includes the Group's main purchasing categories, including agricultural raw materials, ingredients, and, where applicable, other technical-industrial categories relevant for certification purposes. The baseline is represented by the coverage level recorded in 2024. The target is progressive and ongoing, with no single predefined final threshold, and includes a 2026 goal to maintain the certified share of raw materials out of the total sourced by the Group. Monitoring is carried out through expenditure mapping, classification of certified and non-certified supplies, documentary checks, and data from Procurement, Quality, and Management Control systems.
- **Completion of the Human Rights Risk Assessment (HRRA) and integration into supply chain management processes**: The Group aims to complete and consolidate the HRRA process, as described in section S2-3, across the value chain, in order to establish a structured basis for risk prioritization and the definition of subsequent mitigation measures. Progress is monitored through project milestones, the number of categories/suppliers analyzed, completion of supplier surveys, and integration of results into business processes.
- **Strengthening monitoring mechanisms in higher-risk operational contexts**: The Group aims to progressively strengthen verification and monitoring mechanisms for suppliers and operational contexts most exposed to social risks. In this context, the aforementioned risk analysis will be used to integrate social topics into supplier assessment questionnaires, with the objective of completing implementation by March 2026. The baseline is represented by the pre-existing supplier evaluation framework, while progress is monitored through indicators such as the level of integration of social topics into questionnaires, completion rates, the emergence of issues or non-compliances, and the status of any improvement and remediation actions.

Affected Communities

Table 34. Material impacts, risks and opportunities relating to affected communities (S3)

Material IROs in S3 – Affected communities
Impacts
Job creation in local communities (own operations) – ACTUAL
Relationship and dialogue with local communities (own operations) – ACTUAL
Use of natural resources (upstream) – POTENTIAL
Impact on the health of local communities due to soil pollution from production sites (upstream) – POTENTIAL
Opportunities
Opportunity for reputational improvement following food donations (own operations)

The double materiality assessment highlighted the presence of significant impacts, both positive and negative, on affected communities, connected both with the Group's direct activities and with activities along the value chain, particularly upstream.

With reference to direct operations, the Group generates positive impacts on local communities by contributing to the socio-economic development of the territories in which it operates, through job creation and, where possible, the use of local suppliers. The Group also promotes dialogue with communities through social, educational and cultural initiatives and projects, such as the "B Corp School" project, in collaboration with local authorities and organizations.

Along the value chain, potential negative impacts were identified in connection with suppliers' exploitation of natural resources and the environmental effects of production processes, which may affect the availability of resources and the health of local communities, particularly in relation to soil pollution.

Among the opportunities, the Group identified the strengthening of its social contribution through food donation initiatives for third-sector organizations, which make it possible to support local communities while reducing food waste

S3-1 – Policies related to affected communities

At Group level, Sammontana does not currently have a formally structured and adopted policy specifically aimed at systematically managing material impacts and opportunities in relation to affected communities along the value chain.

However, the Group has adopted a set of policies and tools that, overall, contribute to overseeing these matters. In particular, the **Stakeholder Engagement Policy** defines principles, responsibilities and methods for stakeholder engagement, explicitly including local communities and the territories in which the Group operates. The policy provides for a structured approach to dialogue, based on principles of transparency, inclusiveness and continuity of engagement, and establishes that information collected through engagement activities is integrated into decision-making processes, impact assessment and updating of the double materiality matrix. Engagement methods include, among others, collaborations with local authorities, social and cultural initiatives, projects with schools and universities, as well as participation in public consultations and discussion forums with institutions and territorial stakeholders. These tools contribute to identifying the needs of affected communities and guiding the Group's activities in managing actual and potential impacts.

In addition, the **Human Rights Policy** formalizes the Group's commitment to preventing and mitigating negative impacts that may also have direct or indirect effects on local communities, particularly along the supply chain.

For further details on the policies adopted, reference is made to disclosure ESRS 2 SBM-3.

S3-2 – Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy

The Sammontana Group adopts a structured approach to engagement with affected communities, developed through continuous relationships with qualified interlocutors such as local authorities, public institutions, third-sector organizations, schools, universities and scientific partners. These interactions allow the Group to collect information on the territorial context and on the needs of communities potentially affected by its activities.

Engagement takes place through educational, social and environmental initiatives developed in collaboration with local stakeholders, including projects with the school and university system, youth empowerment programs, sustainability awareness-raising initiatives and partnerships with third-sector organizations active in the social, healthcare and environmental fields.

The perspectives of affected communities are integrated into the Group's decision-making processes through analysis of feedback collected as part of the initiatives and collaborations activated, including, during the current financial year:

- the B Corp School project with InVento Innovation Lab and local schools;
- youth empowerment projects such as STEPs – *Sinergie Territoriali*, carried out with local actors and financed by Fondazione Cariverona;
- the *Ambassador del Sorriso* (Ambassador of the Smile) program, aimed at spreading a sustainable culture inside and outside the undertaking;
- financial donations to charitable or third-sector associations, including Dynamo Camp, Fondazione Meyer, AISM – Italian Multiple Sclerosis Association, and Fondazione ANT Italia Onlus for National Cancer Assistance;
- environmental and cultural projects such as *Luoghi del Sorriso* (with Scuola Superiore Sant'Anna of Pisa) and environmental awareness-raising initiatives with Legambiente.

The information collected is used to define intervention priorities, guide the activities of the Donations Committee and assess the effectiveness of the initiatives undertaken, contributing to the management of actual and potential impacts on communities. This process makes it possible to calibrate social initiatives according to the emerging needs of communities and to maximize the positive impact of the actions undertaken.

The Group does not directly engage potentially more vulnerable groups or groups exposed to specific impacts. The Group's direct activities do not involve indigenous peoples and do not affect territories or rights attributable to such communities. Therefore, during the reporting period no specific consultation processes relating to the right to Free, Prior and Informed Consent, or FPIC, were activated.

With regards to remediation channels, in addition to using the engagement moments described above, affected communities may refer to the whistleblowing channel, which is also accessible to external parties. Through this channel, any non-compliant conduct or negative impacts may be reported, including anonymously.

The Group monitors the functioning of these channels and promotes protection of whistleblowers against any retaliation, consistently with corporate policies. With regards to approaches to remedy, where the Group identifies material negative impacts on communities to which it has contributed or with which it is directly linked, it undertakes to adopt corrective measures and, where applicable, to cooperate with the parties involved to resolve them. These interventions are defined on a case-by-case basis and may include mitigation actions, operational adjustments or the involvement of competent stakeholders.

For information on the channels through which affected communities may raise any concerns, reference is made to chapter ESRS 2 SBM-3.

S3-3 – Actions and resources related to affected communities

The Sammontana Group adopts a structured approach to managing both positive and negative impacts on affected communities, through a set of actions aimed at generating social value in the territories, preventing and mitigating potential adverse impacts, and strengthening its contribution to local sustainable development. These actions are aligned with the impacts identified through the double materiality assessment, particularly with regards to the contribution to the socio-economic development of local areas, engagement with local communities, and potential indirect impacts arising from activities along the value chain.

Actions already undertaken

- **Reduction of food waste and support to vulnerable communities through product donations**: The Group carries out an ongoing initiative involving the donation of food products that are no longer marketable but still suitable for consumption, facilitated through the digital platform *Regusto*. The initiative is aimed at mitigating the negative social impacts associated with food waste and generating direct benefits for local communities in vulnerable conditions. The scope includes Italian production sites and a network of local charitable organizations. Donations are made in compliance with food quality and safety requirements and are fully traceable.
  In 2025, the Group donated 29,438 kg of products close to their minimum shelf-life date, reaching 11 non-profit organizations across the national territory. All surplus products were fully recovered, resulting in 58,877 equivalent meals distributed to organizations that support the most vulnerable individuals on a daily basis.
  The environmental impact achieved demonstrates the effectiveness of a circular approach:
    - 57,833 kg of CO_2eq emissions avoided,
    - 48,069 m^3 of water saved,
    - 103,983 m^2 of land preserved due to avoided production and disposal of surplus products.

  The initiative also generated tangible economic benefits, enabling the donation of products with a total value of €168,895, accompanied by tax savings of €14,719 and additional operational efficiencies related to avoided disposal. The action therefore allowed the valorization of surplus products for social purposes while improving the company's economic efficiency.

Effectiveness is monitored through indicators such as quantities donated, number of beneficiary organizations, portions distributed and avoided environmental impacts.

- **Support to the third sector and strengthening of social cohesion in local areas:** The Group supports local communities through financial donations and partnerships with third sector organizations active in health, social inclusion, education, and disability. These initiatives contribute to generating positive impacts in local communities, strengthening social cohesion, and supporting vulnerable groups. Donation activities are coordinated by the Donations Committee, which operates on an annual basis and selects projects based on emerging social needs, input from local stakeholders, and alignment with the Group's corporate policies. In 2025, the Group donated a total of €170,000 to these and other local organizations. Associations receiving regular annual contributions include:
  - Dynamo Camp
  - Fondazione Meyer
  - AISM – Italian Multiple Sclerosis Association
  - ANT Italia Foundation for Cancer Assistance (*Fondazione ANT Italia Onlus per l'Assistenza Nazione Tumori*)

  In addition, in 2025 the Group launched a study support project aimed at facilitating access to higher education, through the provision of three scholarships to students of the University of Gastronomic Sciences of Pollenzo. The project has a three-year duration. The effectiveness of these initiatives is assessed through qualitative feedback from beneficiary organizations and, where applicable, through social impact assessment tools.
- **Educational and cultural initiatives supporting local communities:** The Group promotes educational and cultural initiatives addressed to schools, students, and local communities, with the aim of contributing to social development and preventing marginalization phenomena. Key initiatives include projects (e.g., B Corp School, S.T.E.P.S.– *Sinergie Territoriali*, *Empowerment delle Persone e Società* (Territorial Synergies for the Empowerment of People and Society)) developed in collaboration with schools, universities, and local partners, particularly in the areas where the Group operates. These actions strengthen dialogue with communities and generate positive impacts in terms of social inclusion, education, and civic participation, as well as preventing phenomena such as school dropout, educational exclusion, and gender-based violence. Monitoring is carried out through participation indicators and qualitative evaluations provided by the partners involved.
- **Strengthening and optimization of B Corp Ambassadors training:** The Group continues its path of strengthening and structuring the training of B Corp Ambassadors, with the aim of increasing the number of participants, expanding training content, and enhancing the impact generated both internally and externally. The program includes workshops, training modules, awareness-raising activities, and engagement opportunities with partners, schools, and local stakeholders, enhancing the role of Ambassadors as a link between the company, the territory, and local communities. In 2025, three new Ambassadors joined the program, actively contributing to initiatives such as B Days and the supplier workshop by sharing their expertise. Effectiveness is

monitored through quantitative indicators (number of trained Ambassadors, initiatives launched, stakeholders reached) and qualitative evaluations, with an annual review system aimed at continuous improvement.

- **Governance and monitoring:** The initiatives described above are implemented with the involvement of various corporate departments, including Sustainability, Communication, Human Resources, and Operations, and with the support of qualified external partners. The Group monitors the effectiveness of these initiatives by integrating results into continuous improvement processes and annual reporting.

During the 2025 financial year, no significant cases of negative impacts on affected communities attributable to the Group's activities were identified that required the activation of specific remediation measures.

S3-4 – Targets related to affected communities

As part of its sustainability strategy, the Sammontana Group has defined a voluntary objective aimed at supporting and strengthening its contribution to local communities, in alignment with the positive impacts identified through the double materiality assessment, particularly with regards to socio-economic support for local areas and the reduction of food waste. In this context, the Group aims to maintain and, where possible, increase over time the resources allocated to initiatives benefiting local communities, through a dedicated annual budget that includes financial donations, product donations, and donations of surplus food.

The objective is monitored through quantitative and qualitative indicators, including the economic value of financial donations, the volume of products donated, and the number of beneficiary organizations involved. For 2026, the Group aims to allocate approximately €150 thousand in financial donations and product donations with a total value of approximately €50 thousand (valued at Variable Industrial Cost[56]) in support of non-profit organizations operating in Italy. In addition, for end-of-life product donations, namely surplus food, a target has been set to extend donation initiatives to an additional 12 users[57] compared to those currently served.

The baseline is represented by the values recorded in the 2024 financial year, against which an increase has been observed. Monitoring is carried out on an annual basis, with a focus on maintaining or increasing the resources allocated and the quantities donated, in line with a continuous improvement approach. The scope of application primarily covers the Italian territory and the local communities in which the Group operates through its production sites. Monitoring of the goal is supported by internal data collection and validation systems, which integrate accounting and management information relating to donations.

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56 The Variable Industrial Cost (CIV) is the variable cost of production of a good, i.e. the cost that the company incurs directly to produce it, including raw materials, packaging materials, direct energy and variable direct labor, net of fixed structural costs (depreciation, rents, overheads). Product donations are valued at the CIV to provide a prudent and objective estimate of the economic contribution actually incurred by the Group. By way of example, a product with a retail price of €5.00 could have a CIV of around €1.50–€2.00: the value of €50,000 expressed at the CIV therefore corresponds to a product value at a higher selling price.

57 **Users:** locations identified by the Group to collect donated goods; these collection points may be located away from the Group's production sites, in order to ensure broader territorial coverage.

Consumers and End-users

Table 35. Material impacts, risks and opportunities relating to consumers and end-users (S4)

Material IROs in S4 – Consumers and end-users
Impacts
Customer privacy breaches due to cyberattacks (own operations) – POTENTIAL
Non-compliance with agri-food regulations (own operations) – POTENTIAL
Sale of indulgent products (own operations) – ACTUAL
Marketing activities with misleading promotion of “indulgent” products (own operations) – POTENTIAL
Risks
Legal actions/penalties and/or reputational damage due to violations of agri-food regulations (own operations)

The double materiality assessment highlighted that consumers and end-users represent a relevant stakeholder group in relation to potential impacts arising from the Group’s activities, as well as risks connected with the management of such impacts.

With reference to impacts on consumers, the Group has identified key areas of attention relating in particular to personal data protection, product safety and quality, and the fairness of commercial communication practices. Any weaknessesin cybersecurity systems could result in unauthorized access to consumer data, while non-compliance with agri-food regulations or ineffective quality controls could affect consumer health and safety. Potential impacts have also been identified in relation to marketing practices that are not fully transparent or not adequately calibrated for vulnerable categories, such as children.

These impacts may translate into risks for the Group, including legal and regulatory risks, financial penalties and reputational damage, particularly in the event of breaches of regulations on food safety, personal data protection or commercial communication.

These areas are subject to specific organizational and procedural safeguards, described in the following sections.

S4-1 – Policies related to consumers and end-users

The Sammontana Group has adopted a set of policies and tools aimed at managing the main impacts, risks and opportunities relating to consumers and end-users, with particular reference to product safety, personal data protection and the fairness of commercial communication practices. For further information on the policies described below, references are made to ESRS 2 SBM-3.

In relation to commercial communication, the Group has adopted an **Ethical Marketing Policy**, which defines principles and criteria for responsible, transparent and non-misleading communication, with particular attention to the protection of children and vulnerable people. The policy applies to all forms of communication relating to every product line and aims to prevent misleading content or content that is not compliant with ethical and regulatory standards.

With reference to personal data protection, the Group operates in compliance with **Regulation (EU) 2016/679, GDPR,** through a privacy management system that governs the processing of consumer data and ensures the exercise of data subjects' rights, including access, rectification and erasure of data.

The **External Social Media Policy** governs interactions with users who promote Sammontana products on digital platforms, defining permitted and prohibited behaviors, as well as content moderation measures, in order to prevent risks connected with inappropriate communications, misleading content or privacy breaches.

The Group also adopts safeguards and procedures aimed at ensuring product safety and quality throughout the entire production process, in compliance with applicable agri-food regulations and sector standards, contributing to protecting consumers' health and safety. In this context, the **Quality and Food Safety Policy** provide guidance, defining the Group's principles and commitments on food safety, regulatory compliance and continuous improvement. It ensures risk control throughout the entire production chain, accuracy of information provided to consumers, and protection of customer health and safety.

Further safeguards are adopted through the **Anti-Corruption Code**, which indirectly contributes to consumer protection by promoting integrity, fairness and transparency in commercial relationships. For further information, references are made to G1 Chapter.

S4-2 – Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy

The Sammontana Group adopts a structured approach to engagement with consumers and end-users, based on a multi-channel system of direct interaction including a toll-free number, dedicated email addresses, online forms, monitored social media channels and contacts through the commercial network. The information collected through these channels, together with the results of satisfaction surveys and sales data analyses, enables the Group to understand consumers' needs and expectations and to integrate these perspectives into decision-making processes and continuous improvement activities, particularly in relation to product quality, food safety and commercial communication. In addition, for private-label products, interaction with consumers takes place in coordination with customer care services of commercial partners and with co-packers, ensuring information and management consistency along the supply chain.

The Group does not directly engage consumers who may be more vulnerable or exposed to specific impacts, such as children and people with food allergies or intolerances. However, their perspectives are considered indirectly through market studies and analyses during product development phases, also through the involvement of the Sustainability Team. Analyses and studies are also conducted on the accessibility and inclusiveness of products and information channels, with the objective of ensuring that the specific needs of these consumer categories are adequately considered and incorporated into the evolution of strategies and operating practices.

With reference to the reporting and direct interaction channels described above, the Group has a structured complaint management system governed by internal procedures, which guarantees the collection, traceability and management of reports from consumers. All reports are recorded in a centralized database managed by the Quality department, which enables systematic trend analysis and monitoring of critical issues. The effectiveness of channels is monitored through indicators such as response timeliness and complaint resolution rate, allowing areas for improvement to be identified and preventive measures to be strengthened.

With regards to approaches to remediation, the Group undertakes to manage reports promptly and to activate appropriate corrective actions where negative impacts on consumers are identified. In the most significant cases, such as reports relating to product safety, the process provides for technical analysis of the product, involvement of suppliers and, where necessary, activation of product withdrawal or recall procedures, as well as involvement of legal and insurance departments. The effectiveness of actions taken is assessed through case resolution, implementation of corrective and preventive actions, and monitoring of customer satisfaction.

Overall, the complaint and consumer interaction management system constitutes a key safeguard for preventing and mitigating negative impacts and for continuously improving the quality of the products and services offered.

S4-3 – Actions and resources related to consumers and end-users

The Sammontana Group has implemented a set of structured actions aimed at preventing, mitigating and, where necessary, remediating actual and potential impacts on consumers and end-users, particularly in relation to product safety, transparency of information and fairness of marketing practices. These actions are developed on the basis of structured processes that include materiality analysis, market research, consumer feedback and continuous performance monitoring.

Actions already undertaken

- **Transparency and ESG communication towards consumers**: The Group promotes transparent communication of ESG information through product packaging and in-depth digital content. This action applies to the entire product portfolio and aims to ensure consumers' right to information, preventing risks of misinformation and greenwashing. The effectiveness of the initiative is monitored through specific communication KPIs, such as access to digital content, and is overseen by cross-functional teams, representing a preventive measure aimed at mitigating the risk of greenwashing and misinformation.
- **Management of non-conformities and complaints**: The Group adopts a structured procedure for managing complaints and non-conformities, based on corrective and preventive actions, improvement plans, and effectiveness checks. This action enables the mitigation of negative impacts on consumers, particularly with regards to product quality and safety, and allows for the timely activation of remedies in the most relevant cases. The system includes continuous monitoring, periodic reviews, and the integration of specific indicators into decision-making processes, such as the number of complaints and product and raw material compliance indicators.
- **Development of inclusive products**: The Group continuously develops and expands the *Amando* range, consisting of 100% plant-based, milk- and gluten-free products, in order to meet the needs of consumers with specific dietary requirements and promote greater inclusivity. This action contributes to mitigating potential impacts related to product accessibility for consumers with specific needs. The performance and effectiveness of the development and expansion of the Amando range are monitored through **market KPIs, supply chain traceability, and consumer feedback**, with particular reference to the ability of products to meet the needs of consumers with specific dietary requirements. In particular, the Group uses periodic monitoring reports, primarily focused on weekly sales performance at the individual product level within the Amando range. These reports enable analysis of the market penetration of 100% plant-based and

milk- and gluten-free products, supporting the assessment of offering accessibility for consumers with specific needs. The data used to prepare the reports are sourced from the company's management system, ensuring reliability, traceability, and continuous updating of information. This monitoring system enables the Group to assess over time the actual ability of the Amando offering to meet the needs of consumers with specific dietary requirements and to support increasing inclusivity.

- **Responsible advertising practices**: The Group adopts responsible commercial communication practices based on Ethical Marketing guidelines and a multi-level review process involving Marketing, Legal, Quality, and IT departments. The action, applied to all ongoing marketing campaigns, is aligned with the Advertising Self-Regulation Code and Directive 2005/29/EC on unfair commercial practices, contributing to consumer protection and the prevention of misleading messages, stereotypes, greenwashing, and unsupported claims. The effectiveness of the action is monitored through systematic review and recording of campaigns, periodic internal checks, and the analysis of external feedback, contributing to mitigating reputational risks and strengthening consumer trust.

The actions are implemented with the involvement of various corporate departments, including Quality, Marketing, Legal, IT, and Sustainability, and with the support of external partners for research, analysis, and communication activities.

The Group monitors the effectiveness of the actions through quantitative and qualitative indicators, integrated into internal reporting systems and continuous improvement processes.

Planned actions

- **Development of the Ethical Marketing operational plan:** the Group plans to develop an operational plan for the Ethical Marketing Policy, aimed at making the management of commercial communication practices more structured and measurable. The action will include the definition of KPIs, training activities and preventive control mechanisms, with particular attention to protecting vulnerable consumers. The feasibility study linked to the new geographical and commercial scope is planned between 2026 and 2027, as the new organizational set-up has been awaiting approval. Effectiveness will be monitored through market analyses, surveys of loyal consumers and social networks.

S4-4 – Targets related to consumers and end-users

The Group has defined specific targets aimed at preventing and mitigating negative impacts on consumers, by strengthening product compliance and safety levels, as well as adherence to agri-food regulations, throughout the entire production cycle, in line with the Quality and Food Safety Policy. These targets are based on a structured quality management system focused on the prevention of non-conformities, the protection of consumer health, the continuous improvement of processes, and the reduction of complaints.

In particular, the Group has defined the following targets:

- **Raw material compliance:** Maintaining and strengthening the level of compliance of raw materials received from suppliers, measured as the ratio between batches compliant with internally defined quality and safety specifications and the total number of batches delivered. The Group aims to maintain a compliance level above 96% for each production line (ice cream, sweet pastry, patisserie). The target is defined in relative terms (percentage) as a minimum threshold.

Baseline: Represented by the value recorded in 2025, namely 98% for the ice cream line, 96% for sweet pastry, and 98% for patisserie.

- **Finished product compliance:** Maintain, for 2026, a finished product compliance level (for the ice cream, sweet pastry, and patisserie production lines) above 98%, calculated as the percentage of compliant units produced compared to the total number of units produced. The baseline is represented by the value recorded in 2025, i.e. a level above 99% for the ice cream line, 98% for sweet pastry, and 98% for patisserie.
- **Reduction of consumer complaints:** The Group has set a target aimed at reducing consumer complaints related to products sold, as a key indicator of quality and food safety as perceived by the end consumer. The objective is expressed in terms of Parts Per Million (PPM), i.e. the number of complaints received per million units of product sold, enabling consistent and comparable monitoring across different categories and production volumes. By 2026, the Group aims to progressively reduce the complaint rate compared to the levels recorded in 2025, reaching a value below 0.4 PPM per product in each of the main Italian operating divisions. At the 2025 baseline, complaint levels vary across production sites and product categories. In particular, the complaint rate is below 0.6 PPM for the Empoli ice cream plant and 1.6 PPM for the Colognola plant; for patisserie products, it is below 1.2 PPM for the San Giuliano Milanese site and 2.1 PPM for the Jesolo site. The sweet pastry division already shows a performance level aligned with the target, with a complaint rate below 0.4 PPM.

The targets apply to all the Group’s Italian operations and cover production processes and complaint management. Monitoring is carried out through periodic KPIs based on data from the Quality department and structured non-conformity management systems, with annual review by Management.

Governance Disclosures

Business Conduct

Table 36. Material impacts, risks and opportunities relating to Business Conduct (G1)

Material IROs in G1 – Business Conduct
Impacts
Promotion of ethics and transparency (own operations) - ACTUAL
Lack of a sustainability training program extended to all employees (own operations) – POTENTIAL
Possible failure of whistleblowing procedures (own operations) – POTENTIAL
Animal welfare protection (own operations) – ACTUAL
Lack of Group-wide implementation of ESG supplier selection criteria (own operations) – ACTUAL
Potential corruption events (own operations) – POTENTIAL
Risks
Risk of legal actions, sanctions and/or reputational damage due to violations of agri-food regulations (own operations)
Opportunities
Opportunity to enhance brand image and increase sales through the development of eco-design-oriented products (own operations)

In the context of business conduct management, Sammontana has identified a series of material impacts, risks and opportunities connected with strengthening governance safeguards, integrity in business conduct and the responsible management of the value chain.

In particular, among current positive impacts, the Group actively promotes principles of ethics, transparency and responsibility, including through the adoption of business models oriented towards common benefit and the integration of responsible practices along the supply chain, including aspects related to animal welfare. The maintenance of Benefit Corporation status by Sammontana Italia S.p.A. Società Benefit contributes to strengthening the promotion of ethics and transparency, formalising the integration of common-benefit objectives into business strategies. In this regard, the Group has expressed its commitment to extending this status to the parent company, Sammontana Holding, in the next financial year.

At the same time, the analysis highlighted potential negative impacts connected with the incomplete alignment of ESG safeguards at Group level, following the corporate expansion, the possible ineffectiveness of internal reporting systems and the uneven dissemination of a sustainability culture among employees. Additional areas of attention concern the risk of unlawful conduct, including corruption-related events, and the systematic integration of ESG criteria into supplier selection and evaluation processes.

These impacts are reflected in legal, operational and reputational risks, particularly in relation to non-compliance with applicable regulations in the agri-food sector. At the same time, they highlight opportunities to strengthen the governance model and develop products and processes oriented towards sustainability, with potential benefits in terms of reputation and competitive positioning.

In this context, the Group has launched a process to progressively strengthen its governance, control and training tools, with the aim of ensuring increasingly integrated and consistent management of business conduct principles across all activities and business relationships.

G1-1 – Policies related to business conduct

The Sammontana Group has adopted various policies and safeguards aimed at promoting integrity, appropriate protection and reporting mechanisms for breaches, the progressive integration of ESG criteria into procurement processes, and the promotion of a corporate culture based on responsibility and ethics. The policies relating to the prevention of corruption and bribery are consistent with applicable international principles and are accompanied by dedicated procedures for the protection of whistleblowers, in line with applicable legislation. These policies also apply to employees, collaborators, suppliers and business partners across the entire value chain. With regards to corruption, the departments most exposed to risks in this area are those characterized by interactions with Public Administration and by significant negotiating responsibilities, including particularly the Technical Department and the Environment, Health and Safety departments.

The relevant policies are described in greater detail in the ESRS 2 SBM-3 section, which includes the information required under the GDR-P disclosure requirements.

The **Anti-Corruption Code** defines the principles and operational rules aimed at preventing and combating any form of corruption, both in relationships with public parties and between private counterparties. The document establishes a zero-tolerance approach to corrupt practices, regulating areas such as the management of commercial relationships, supplier selection, financial flows, gifts and sponsorships.

The **Code of Ethics** complements these safeguards by defining the values and principles of conduct that guide the Group's actions in its relationships with all stakeholders. It promotes conduct based on legality, integrity and transparency, helping to prevent unethical behavior and mitigate reputational risks. The Code also establishes principles of conduct regarding the responsible use of information and corporate assets, transparency and completeness of information, protection of corporate assets and fairness in managing relationships with customers, suppliers and other counterparties. Through the adoption of these rules of conduct and the obligation to comply with the principles set out therein, the Code aims to prevent unethical behavior and foster relationships based on trust, responsibility and mutual respect along the value chain, contributing to the mitigation of ethical and reputational risks.

The Group has adopted an **Organization, Management and Control Model** pursuant to Legislative Decree 231/2001, aimed at preventing the offences provided for by the legislation and ensuring the compliance of corporate processes. The Model identifies activities at risk, defines operational protocols and provides for a system of controls and audits. The updating and approval of the Model are entrusted to the Board of Directors, while oversight of its effectiveness and implementation is assigned to the Supervisory Body, which has autonomy and independence. The Model includes specific safeguards relating to health, safety and the environment, with reference to the risks provided for under Article 25-*septies* of Legislative Decree 231/2001, and provides for training activities addressed to personnel.

The Group has a reporting system (a **whistleblowing procedure**) which allows the reporting of conduct or situations of non-compliance that may affect corporate integrity. The procedure regulates, in a structured manner, the methods for receiving, analyzing and managing reports, which may also be submitted anonymously. The channel is accessible to a range of parties, including employees, collaborators, temporary agency workers, consultants, interns and other persons operating within the Group's work-related context. The system provides for technical and organizational measures aimed at ensuring the confidentiality of the whistleblower's identity and the security of the data processed, as well as specific protections against any retaliatory acts, in line with applicable legislation.

The **Sustainable Procurement Policy** guides procurement processes towards environmental, social and ethical criteria, promoting transparency, traceability and integrity along the supply chain. In this context, the Policy commits the Group to ensuring an ethical and transparent supply chain, guaranteeing high standards of integrity and traceability throughout the entire procurement process. Other principles set out in the Policy concern procurement decisions, which are progressively oriented towards reducing environmental impacts through the selection of raw materials, packaging, goods and services with lower impact and the adoption of responsible practices in the use of resources, as well as the protection of human rights and working conditions along the supply chain, requiring suppliers to comply with ethical principles and applicable regulations. Finally, the Group promotes long-term relationships with its partners, fostering dialogue, collaboration and continuous improvement pathways, including with a view to reducing emissions and developing a responsible supply chain in the various geographical contexts in which it operates.

These commitments are implemented operationally through the **Supplier Selection and Periodic Evaluation Procedure**, which regulates in a structured manner the qualification, ongoing evaluation and review of suppliers of raw materials, semi-finished products, packaging materials and branded finished products, at both national and international level. The procedure, which is mainly focused on quality, food safety, traceability and regulatory compliance, is based on documentary requirements, audits, vendor-rating systems and risk analysis, and also contributes indirectly to mitigating potential social impacts along the value chain, strengthening ESG risk management.

Finally, as a Benefit Corporation, the operating parent company Sammontana Italia S.p.A. includes common-benefit purposes in its **Articles of Association**, which guide the business model towards responsible, sustainable and transparent management towards people, local communities, the environment and other stakeholders. In particular, these purposes are structured around the following areas:

- **Product quality and responsible communication,** through the development of high-quality food products and communication consistent with ethical and sustainability principles, aimed at encouraging informed consumer choices and responding to new eating habits and different consumer needs, while respecting the company's roots;
- **Enhancement of communities and new generations,** by contributing to the development of the areas in which the company operates and promoting opportunities for growth and personal fulfilment, with attention to intergenerational exchange;
- **Responsible management of processes and resources,** through the adoption of production, distribution and commercial models based on sustainability, promoting the use of raw materials with lower environmental impact, resource circularity and waste reduction;

- **Collaboration along the supply chain,** encouraging partner engagement and cooperation within the relevant ecosystem in order to foster shared improvement in sustainability performance along the entire value chain;
- **Evolution of the business model,** progressively orienting activities towards a structural reduction of climate-altering emissions and a transition pathway towards a low-emission economy.

G1-2 – Actions related to business conduct

During financial year 2025, the Sammontana Group adopted a set of operational practices and organizational safeguards aimed at preventing, mitigating and managing risks connected with business conduct, with particular reference to the integration of ESG criteria into procurement processes and the prevention of corruption and bribery.

Actions already undertaken

Integration of ESG factors into the selection and management of suppliers

The Group continued to strengthen the integration of environmental, social and governance factors into supplier selection and management processes through structured tools such as the Supplier Code of Conduct and the ESG self-assessment questionnaire. These tools are integrated into the Supplier Selection and Periodic Evaluation Procedure, which serves as the operational reference for supplier qualification, evaluation and review at Group level. The procedure makes it possible to structure the decision-making process on the basis of objective criteria, progressively including ESG elements in the assessment of supplier performance and risk, with particular reference to regulatory compliance, working conditions, health and safety, and environmental aspects. A single Group procedure (harmonized between Sammontana and the integrated companies) has been adopted for supplier evaluation and selection. This procedure is based on a sustainability performance questionnaire which, in 2025, reached 96% of raw-material suppliers in Italy. In 2026, the scope will be extended to foreign suppliers.

At the same time, the Group strengthened the internal skills of the Procurement department through training activities dedicated to the sustainability strategy, Benefit Corporation principles and B Corp requirements, with the aim of integrating ESG criteria more systematically into decision-making processes and the management of relationships with suppliers. The training also covers the link between the environmental and social impacts of the supply chain and common-benefit purposes, strengthening the strategic role of the Procurement department in promoting a responsible supply chain.

The Group also promotes a collaborative approach with suppliers through dialogue opportunities and engagement initiatives, as already described in section S2-3, aimed at progressively improving ESG performance along the value chain.

Prevention and management of corruption risks

Sammontana Group maintained and strengthened its system for preventing corruption and bribery risks, based on the Organization, Management and Control Model pursuant to Legislative Decree 231/2001, the Anti-Corruption Code and the whistleblowing procedure. The system provides for organizational and procedural safeguards aimed at preventing, detecting and managing potential unlawful conduct, with particular reference to the activities and corporate departments most exposed to risks, such as those involved in relations with Public Administration and in negotiating activities.

During the financial year, these safeguards were supported by periodic training activities addressed to employees and collaborators, delivered annually and aimed at strengthening knowledge of the contents of the 231 Model, the Anti-Corruption Code and the whistleblowing procedure, as well as the expected conduct in terms of integrity and regulatory compliance.

The training activities also include specific references to corruption and bribery risks and reporting mechanisms, contributing to strengthening the Group's ability to prevent and manage any breaches of internal procedures and standards.

G1-3 – Targets related to business conduct

As at the reporting date, the Group has not defined any specific quantitative or qualitative targets in relation to the management of its own impacts and value-chain impacts connected with governance under ESRS G1. However, the Group recognizes the importance of overseeing this topic and maintains an active system for monitoring and controlling environmental performance, reserving the right to assess, over the medium term, whether to introduce improvement targets should new regulatory, operational or contextual needs arise.

G1-4 – Metrics related to corruption or bribery

During the financial year 2025, no confirmed cases of active or passive corruption were recorded, nor were any events attributable to bribery identified within the Group's reporting scope. Consequently, no administrative sanctions were imposed, no fines were issued and there are no ongoing legal proceedings relating to such matters.

The Group monitors these aspects through its internal control system and the safeguards provided for under the 231 Model and the whistleblowing procedure, which enable the timely identification and management of any non-compliant conduct.

G1-6 – Metrics related to payment practices

The Sammontana Group defines and formalizes supplier relationships through contracts that clearly set out payment methods and terms, in full compliance with applicable regulations. Payment conditions are established at the contractual stage and are fair and consistent with market conditions, with particular attention to the needs of smaller suppliers, including SMEs. This approach is aimed at ensuring responsible management of the financial commitments undertaken and timely compliance with the agreed conditions.

The standard payment terms applied by the Group are generally set for **60 days**. For smaller suppliers or in specific operational circumstances, for example, for specific product categories, a **preferential 30-day term** is applied. Depending on the main supplier categories, the standard payment terms are structured as follows:

- **Perishable products:** 30 days
- **Other agricultural and food products:** 60 days
- **Packaging:** between 60 and 120 days
- **Services:** between 60 and 90 days

During the financial year 2025, the average time to pay invoices, calculated from the start of the contractual payment term and referring to all the supplier categories listed above, was **80.33 days**. **100% of payments made were aligned with the timeframes established** by the standard payment terms. As at the reporting date, there are **no legal proceedings currently outstanding for late payments**.

ESRS Content Index

It should be noted that only the relevant topical ESRS, in addition to the mandatory ESRS 2, have been included.

Table 37. ESRS content index

ESRS	Disclosure requirements	Description of the disclosure requirements	Paragraph	Page
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ESRS 2	BP-2	Specific information if the undertaking uses phasing-in options	BP-2 - Specific information if the undertaking uses phasing-in options	4
ESRS 2	GOV-1	The role of the administrative, management and supervisory bodies in relation to sustainability	GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	4
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ESRS 2	GOV-3	Statement on due diligence	GOV-3 - Statement on due diligence	7
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ESRS 2	IRO-1	Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	23
ESRS 2	IRO-2	Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement	IRO-2 – Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement	24
ESRS 2	GDR-P	General Disclosure Requirement for policies	SBM-3 - Interaction of material impacts risks and opportunities with strategy and business model, and financial effects	12
ESRS 2	GDR-A	General Disclosure Requirement for actions and resources	In the respective sections on actions, targets and metrics within each chapter topic	-
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ESRS E1	E1-7	Energy consumption and mix	E1-7 - Energy consumption and mix	33
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ESRS E1	E1-9	GHG removals and GHG mitigation projects financed through carbon credits	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37
ESRS E1	E1-10	Internal carbon pricing	E1-10 - Internal carbon pricing	37
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ESRS E2	E2-2	Actions and resources related to pollution	E2-2 - Actions and resources related to pollution	39
ESRS E2	E2-3	Targets related to pollution	E2-3 - Targets related to pollution	40
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ESRS S1	S1-16	Incidents of discrimination and other human rights incidents	S1-16 - Incidents of discrimination and other human rights incidents	74
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List of datapoints in cross-cutting and topical standards that derive from other EU legislation

Table 38. List of datapoints derived from other EU legislation

Disclosure Requirement and related datapoint in ESRS	SFDR reference[58]	Pillar 3 reference[59]	Benchmark regulation reference[60]	EU Climate Law reference[61]	Page	Non-material[62]
ESRS 2 GOV-1 Percentage of independent members on the Board of Directors			Commission Delegated Regulation (EU) 2020/1816, annex II			-
ESRS 2 GOV-4 Statement on due diligence	Annex I, Table 3, indicator no. 10		Commission Delegated Regulation (EU) 2020/1816, annex II			-
ESRS 2 SBM-1 Involvement in fossil fuel-related activities	Annex I, Table 4, indicator no. 4	Article 449a of Regulation (EU) No 575/2013, read in conjunction with Article 435 of the same Regulation; Commission Implementing Regulation (EU) 2024/3172[63]; Table 1: Qualitative	Commission Delegated Regulation (EU) 2020/1816, annex II			-

[58] Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosure Regulation – SFDR) (OJ L 317, 9.12.2019, p. 1)
[59] Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation – CRR).
[60] Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).
[61] Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9.7.2021, p. 1)
[62] In the table below, the symbol "–" indicates relevant requirements, while the symbol "X" indicates requirements that are not relevant for the Group.
[63] Commission Implementing Regulation (EU) 2024/3172, of 29 November 2024, laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637.

		information on environmental risk and Table 2: Qualitative information on social risk; Template 1: (banking book) – Climate change transition risk indicators. Transition risk: credit quality of exposures by sector, emissions and residual maturity.				
ESRS 2 SBM-1 Involvement in activities related to the production of chemicals	Annex I, Table 2, Indicator no. 9		Commission Delegated Regulation (EU) 2020/1816, annex II			X
ESRS 2 SBM-1 Involvement in activities related to controversial weapons	Annex I, table 1, indicator no. 14		Article 12, paragraph 1, of the delegated regulation (EU) 2020/1818[64], Article 12, paragraph 1, of the delegated regulation (EU) 2020/1818 and Annex II of the delegated regulation (EU) 2020/1816			X
ESRS 2 SBM-1 Involvement in activities related to the cultivation and			Article 12, paragraph 1, of the delegated regulation (EU)			X

[64] Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks (OJ L 406, 3.12.2020, p. 17), as amended by Commission Delegated Regulation (EU) 2025/1775.

production of tobacco			2020/181823, Article 12, paragraph 1, of the delegated regulation (EU) 2020/1818 and Annex II of the delegated regulation (EU) 2020/1816			
ESRS E1-1 Climate change mitigation transition plan				Article 2, paragraph 1, of the Regulation (EU) 2021/1119		-
ESRS E1-6 Greenhouse gas (GHG) emission reduction targets	Annex I, Table 2, indicator no. 4	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2024/3172; Template 3: (banking book) – Climate transition risk: alignment metrics.	Article 6 of Commission Delegated Regulation (EU) 2020/1818			-
ESRS E1-7 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	Annex I, Table 1, indicator no. 5 and Table 2, indicator no. 5					-
ESRS E1-7 Energy consumption and energy mix	Annex I, Table 1, indicator no. 5					-
ESRS E1-8 Gross Scope 1, 2 and 3 GHG emissions	Indicatori n. 1 e 2 – Tabella n. 1 dell'Allegato I	Articolo 449a del Regolamento (UE) n. 575/2013; Regolamento di esecuzione (UE)	Regolamento delegato (UE) 2020/1818, articoli 5, paragrafo 1,			-

		2024/3172 della Commissione Template 1: Portafoglio bancario (banking book) – Rischio di transizione climatica: qualità creditizia delle esposizioni per settore, emissioni e scadenza residua	6 e 8, paragrafo 1			
ESRS E1-9 GHG removals and carbon credits				Regolamento (UE) 2021/1119, articolo 2, paragrafo 1		-
ESRS E1-11 Exposure of the reference portfolio to climate-related physical risks			Annex II to Commission Delegated Regulation (EU) 2020/1818; Annex II to Commission Delegated Regulation (EU) 2020/1816.			-
ESRS E1-11 Location of significant assets exposed to material physical risks		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2024/3172; Template 5: (banking book) – Physical climate risk: exposures subject to physical risk.				X
ESRS E1-11 Breakdown of the carrying amount of real estate assets by energy efficiency class		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2024/3172;				X

		Template 2: (banking book) – Climate transition risk: loans collateralised by immovable property – energy efficiency of the collateral.				
ESRS E1-11 Degree of exposure of the portfolio to climate-related opportunities			Annex II to Commission Delegated Regulation (EU) 2020/1818			-
ESRS E2-4 Amount of material pollutants emitted to air, water and soil	Annex I, Table 1, indicator no. 8, Annex I, Table 2, indicator no. 2, Annex I, Table 2, indicator no. 1, Annex I, Table 2, indicator no. 3,					-
ESRS E3-1 Water-related policies	Annex I, Table 2, Indicator no. 7					-
ESRS E3-1 Policy covering areas with-water stress	Annex I, Table 2, Indicator no. 8					-
ESRS E3-4 Total water recycled and reused	Annex I, Table 2, Indicator no. 6.2					-
ESRS E4-5 Activities negatively affecting biodiversity-sensitive areas	Annex I, Table 7, Indicator no. 1					X
ESRS E4-2 Policy covering sites in or near	Annex I, Table 2, Indicator no. 14.2					-

biodiversity-sensitive areas						
ESRS E5-5 Hazardous waste and radioactive waste	Indicatore numero 9 Tabella n. 1 dell'Allegato 1					-
ESRS 2 IRO-2 Risk of exposure to incidents of forced labor	Annex I, Table 3, Indicator no. 12					-
ESRS 2 IRO-2 Risk of exposure to incidents of child labor	Annex I, Table 3, Indicator no. 12					-
ESRS 2 GDR-P Human rights policy commitments	Annex I, Table 3, Indicator no. 9, Annex I, Table 3, Indicator no. 11		Annex II to Commission Delegated Regulation (EU) 2020/1816.			-
ESRS S1-1 Processes and measures for preventing trafficking in human beings	Annex I, Table 3, Indicator no. 11					X
ESRS S1-13 Health and safety management system	Annex I, Table 3, Indicator no. 1					-
ESRS S1-2 Grievance mechanism, including employee-related issues	Annex I, Table 3, Indicator no. 5 and indicator no. 11					-
ESRS S1-13 Rate of work-related accidents	Annex I, Table 3, Indicator no. 2					-
ESRS S1-13 Number of days lost due to injuries,	Annex I, Table 3,					-

accidents and illness	Indicator no. 3					
ESRS S1-15 Unadjusted gender pay gap	Annex I, Table 1, Indicator no. 12		Annex II to Commission Delegated Regulation (EU) 2020/1816.			-
ESRS S1-15 Annual total remuneration ratio	Annex I, Table 3, Indicator no. 8					-
ESRS S1-16 Incidents of discrimination	Annex I, Table 3, Indicator no. 7					-
ESRS S1-16 Human rights incidents	Annex I, Table 1, Indicator no. 10 and Table 3, indicator no. 14		Annex II to Commission Delegated Regulation (EU) 2020/1816.			-
ESRS S2-1 Processes and measures for preventing trafficking in human beings	Annex I, Table 3, Indicator no. 11					X
ESRS S2-1 Code of conduct		Annex I, Table 3, Indicator no. 4				-
ESRS S2-3 Human rights incidents	Annex I, Table 1, Indicator no. 10 and Annex I, Table 3, indicator no. 14		Annex II to Commission Delegated Regulation (EU) 2020/1816.			-
ESRS S3-2 Grievance mechanism	Indicator number 11 Table #1 of Annex I					-
ESRS S3-3	Annex I, Table 1, Indicator		Annex II to Commission Delegated			-

Human rights incidents	no. 10 nad Annex I, Table 3, Indicator no. 14		Regulation (EU) 2020/1816, Annex II to Commission Delegated Regulation (EU) 2020/1816, Annex II to Commission Delegated Regulation (EU) 2020/1816			
ESRS S4-2 Grievance mechanism	Annex I, Table 1, Indicator no. 11					-
ESRS S4-3 Human rights incidents	Annex I, Table 1, Indicator no. 10 and Annex I, Table 3, Indicator no. 14		Delegated Regulation (EU) 2020/1816, Section 1 and 2 on Social in Annex II			-
ESRS G1-1 Policies consistent with the United Nations Convention against Corruption	Annex I, Table 3, Indicator no. 15					-
ESRS G1-1 Protection of whistle-blowers	Annex I, Table 3, Indicator no. 6					-
ESRS G1-4 Convictions and fines for violations of anti-corruption and anti-bribery laws	Annex I, Table 3, Indicator no. 17					-
ESRS G1-4 Actions to address breaches of anti-	Annex I, Table 3,					-

corruption and anti-bribery standards	Indicator no. 16					