



SAMMONTANA ITALIA



SUSTAINABILITY STATEMENT 2024

SAMMONTANA HOLDING GROUP

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GENERAL DISCLOSURES

BASIS FOR PREPARATION

BP-1 – General basis for preparation of sustainability statements

Except as clarified in this paragraph, the sustainability statement (the “Sustainability Report”) of Sammontana Holding (hereinafter also referred to as the “Group” or “Sammontana”) is prepared consistent with the scope of the audited consolidated financial statements of Sammontana Italia (as defined below) as of and for the year ended December 31, 2024, the results of operations of (i) Sammontana Italia S.p.A. (“Sammontana Italia”) since its formation on January 17, 2024, (ii) Sammontana S.p.A. Società Benefit (“Sammontana SB” and, together with its subsidiaries, the “Sammontana SB Group”) and its subsidiaries from January 1, 2024 and (iii) Forno d’Asolo S.p.A. (“Forno d’Asolo and together with its subsidiaries, the “Forno d’Asolo Group”) and its subsidiaries, excluding Lizzi S.r.l., from their acquisition by Sammontana Italia on July 30, 2024 (Sammontana Italia and its subsidiaries are referred to as the “Group” or “Sammontana”). The following entities without production facilities are excluded from the scope of the Sustainability Report Forno E+ GmbH, Bindi Deutschland GmbH, Bononia SAS, Dakana Services SAS, and Les Experts Pâtisseries SAS.

The year 2024 marked a period of significant reorganization and transition for the Group. As a result, certain information related to the new Group’s perimeter, particularly related to governance, was not available at the time of reporting. Sammontana is committed to including the missing information in future reporting.

This sustainability report describes the value chain, both upstream and downstream and identifies and assesses the related impacts, risks, and opportunities. It also illustrates the policies, actions, and targets connected to the value chain. As 2024 is the Group’s first reporting year under the European Sustainability Reporting Standards (the “ESRS”), the Group has applied the transitional provisions on value chain metrics provided by the standards.

The Group has not omitted any information related to intellectual property, know-how, or innovation outcomes, and it has not relied on the exemptions set out in Articles 19a(3) and 29a(3) of Directive 2013/34/EU, for matters under development or negotiation.

BP-2 – Disclosures in relation to specific circumstances

The Group has applied the medium- and long-term time horizons as defined in ESRS 1. Additionally, this sustainability report does not include metrics or monetary amounts that are subject to a high degree of uncertainty.

Because the Group’s average workforce exceeds 750 employees, transitional provisions available to undertakings below this threshold, as set out in Appendix C to ESRS 1, do not apply to the Group.

GOVERNANCE

GOV-1 – The role of the administrative, management and supervisory bodies

The administrative, management and supervisory bodies of Sammontana play a central role in defining the Group's strategic direction and in overseeing the economic, environmental and social matters that are material to the organization. The Board of Directors ensures the integration of sustainability into the business model and monitors its implementation through regular reporting. Management functions ensure the operational execution of these strategies by coordinating the activities of the various departments.

The Board of Directors is composed of three executive members and six non-executive members, with women representing 22% of the Board of Directors.

The second- and third-level control functions, including those performed by the Board of Statutory Auditors, support transparency and compliance with regulatory requirements, voluntary standards and corporate objectives, thereby contributing to responsible management and the creation of long-term sustainable value.

GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

In 2024, following the acquisition of the Forno d'Asolo Group in July, the Group's sustainability governance was strengthened and redefined. Prior to the acquisition, the corporate governing bodies were kept informed of sustainability-related impacts, risks and opportunities through a structured system that included the Sustainability Steering Committee, the Executive Committee and the support from the Sustainability Manager.

Under the new governance framework, the role of the **Head of Sustainability & Impact** was established, supported by a dedicated team that coordinates the Sustainability Steering Committee, the Group's highest sustainability governance body. This framework ensures the integration of sustainability into corporate strategies and decision-making processes.

The Group adopts a **bottom-up** approach, with operational policies developed by corporate teams and approved by the Board of Directors and, in parallel, a **top-down** approach, implemented through initiatives that promote a culture of sustainability throughout the organization, such as the "Smile Ambassador" project, which involves representatives from all corporate areas.

The Report on the Pursuit of Common Benefit is prepared by the Head of Sustainability & Impact and is made publicly available on the Sammontana Italia website, more specifically in the website section dedicated to Società Benefit.

GOV-3 – Integration of sustainability-related performance in incentive schemes

The remuneration of the top management and the Board of Directors is determined by the Shareholders' Meeting. All members receive a fixed compensation. No objective-based incentive schemes (MBO) are in place for 2024, and therefore no variable remuneration linked to sustainability targets will be paid for 2024. Introducing sustainability objectives as part of the Remuneration Policy is planned for 2025.

GOV-4 – Statement on due diligence

The following mapping outlines how and where the application of the main aspects and phases of the due diligence process is reflected in the Sustainability Report.

| Core elements of due diligence | Paragraph in the Sustainability Report | Page |
|--|---|---|
| Integrate due diligence into the company's governance, strategy and business model | ESRS 2 GOV-2 | 4 |
| | ESRS 2 GOV-3 | 4 |
| | ESRS 2 SBM-3 | 10 |
| Engage stakeholders throughout all key phases of the due diligence process | ESRS 2 GOV-2 | 4 |
| | ESRS 2 SBM-2 | 9 |
| | ESRS S1-2, S1-3 | 37, 39 |
| | ESRS S2-2, S2-3 | 50, 51 |
| | ESRS S3-2, S3-3 | 55, 56 |
| | ESRS S4-2, S4-3 | 63, 64 |
| | ESRS 2 MDR-P ESRS 2 IRO-1 | Dedicated section in each paragraph 11 |
| Identify and assess all actual and potential negative impacts | ESRS 2 IRO-1 | 11 |
| | ESRS 2 SBM-3 | 10 |
| Take action to address all negative impacts | E1-3, ESRS 2 MDR-A | 18 |
| | E2-2, ESRS 2 MDR-A | 23 |
| | E3-2, ESRS 2 MDR- A | 26 |
| | E4-3, ESRS 2 MDR-A | 31 |
| | E5-2, ESRS 2 MDR-A | 34 |
| | S1-4, ESRS 2 MDR- A | 40 |
| | S2-4, ESRS 2 MDR- A | 51 |
| | S3-4, ESRS 2 MDR- A | 56 |
| S4-4, ESRS 2 MDR- A | 65 | |

| | | |
|--|----------------------|-----|
| Monitor and report on the effectiveness of actions taken | E1-4, ESRS 2 MDR-T; | 18 |
| | E1-6, ESRS 2 MDR-M; | 20 |
| | E2-3, ESRS 2 MDR-T; | 24 |
| | E2-4, ESRS 2 MDR-M; | N/A |
| | E2-5, ESRS 2 MDR-M; | 24 |
| | E3-3, ESRS 2 MDR-T; | 27 |
| | E3-4, ESRS 2 MDR-M; | 28 |
| | E4-4, ESRS 2 MDR-T; | 32 |
| | E4-5, ESRS 2 MDR-M; | N/A |
| | E5-3, ESRS 2 MDR-T; | 34 |
| | E5-4, ESRS 2 MDR-M; | 34 |
| | E5-5, ESRS 2 MDR-M; | 34 |
| | S1-5, ESRS 2 MDR-T; | 43 |
| | S1-6, ESRS 2 MDR-M; | 44 |
| | S1-7, ESRS 2 MDR-M; | N/A |
| | S1-8, ESRS 2 MDR-M; | 45 |
| | S1-9, ESRS 2 MDR-M; | 45 |
| | S1-10, ESRS 2 MDR-M; | 46 |
| | S1-11, ESRS 2 MDR-M; | N/A |
| | S1-12, ESRS 2 MDR-M; | N/A |
| | S1-13, ESRS 2 MDR-M; | N/A |
| | S1-14, ESRS 2 MDR-M; | 46 |
| | S1-15, ESRS 2 MDR-M; | N/A |
| | S1-16, ESRS 2 MDR-M; | 47 |
| | S1-17, ESRS 2 MDR-M; | N/A |
| | S2-5, ESRS 2 MDR-T; | 53 |
| | S3-5, ESRS 2 MDR-T; | 59 |
| | S4-5, ESRS 2 MDR-T; | 66 |
| | G1-4, ESRS 2 MDR-M; | 71 |
| | G1-5, ESRS 2 MDR-M; | N/A |
| G1-6, ESRS 2 MDR-M; | 71 | |

Table 1. Core elements of due diligence

GOV-5 – Risk management and internal controls over sustainability reporting

Currently, the Group does not have a dedicated internal control and risk management system for sustainability reporting. As a result, the risks associated with such reporting are not yet identified or assessed and, consequently, no mitigation measures are in place. However, for the 2024 reporting, an ad hoc process has been implemented to ensure the accuracy and completeness of reported data. This process is structured across three levels:

- First-level control: assigned to operational managers, generally based at various sites and plants, who collect and record data;
- Second-level control: assigned to department heads, who aggregate and review data;
- Third-level control: assigned to the Head of Sustainability and Impact, who approves data.

Looking ahead, the Group is evaluating a project to define and implement a dedicated internal control and risk management system for sustainability reporting.

STRATEGY

SBM-1 – Strategy, business model and value chain

Sammontana traditionally offered three product categories: ice cream, sweet pastry and other frozen products. In 2024, following the acquisition of Forno d’Asolo, the product range was

expanded to include a wider selection of savory pastry and patisserie. The Group currently offers products through the following categories: ice cream, sweet pastry, patisserie and savory pastry. The Group distributed its products across Italy, Europe (including France, Germany, Austria, Switzerland and the United Kingdom) and certain other countries (including United States, Canada, Australia, China, Israel and Morocco), serving primarily HoReCa (comprised of cafés, restaurants, hotels and ice cream parlors) and modern trade (comprised of large-scale retail outlets) customers.

The number of employees by geographic area¹ is as follows:

- Italy: 1821
- France: 94
- United States: 178

These figures represent the total Full-Time Equivalents (FTE) as of 31 December 2024.

The Group's sustainability objectives, with respect to significant product and service groups, customer categories, geographic areas and stakeholder engagement, consist of:

1. **Create enjoyable and sustainable experiences**, offering high-quality products and innovative recipes, respecting Italian roots and promoting ethical and transparent communication;
2. **Contribute to community growth**, supporting younger generations in realizing their potential, facilitating intergenerational exchange and creating development opportunities;
3. **Promote sustainable practices**, adopting responsible approaches in production, distribution and trade, reducing waste and promoting the use of resources with lower environmental impact;
4. **Foster interdependence and collaboration**, engaging partners to enhance sustainability across the value chain, recognizing that maximum positive impact can be achieved only together;
5. **Decarbonize the business model**, by transitioning toward a zero-emission economy in line with European and national objectives.

Sammontana has integrated its sustainability objectives across its product categories which include ice cream, sweet pastry, patisserie and savory pastry products. The Group completed environmental impact studies in 2023 for all ice cream and sweet pastry products produced in-house and continues to work on reducing the ecological footprint through sustainable packaging, such as FSC-certified paper-polyethylene primary packaging (Barattolino product) and bio-circular plastics. For frozen pastry products, the Group sources raw materials from certified sustainable suppliers, including Rainforest Alliance-certified cocoa and Fairtrade

¹ This information excludes the workforce employed by the following entities: Forno E+ GmbH (Switzerland) and Bindi Deutschland GmbH (Germany), Bononia SaS (France), Dakana Services SaS (France), Les Experts Pâtisseries SaS (France).

coffee and develops products that meet specific dietary needs, such as gluten-free and vegan options.

For end consumers, the Group offers products with enhanced nutritional profile, including lactose-free, sugar-free, gluten-free, vegan and vegetarian options. Additionally, Sammontana works to reduce food waste at all stages, from production to distribution and supports the donation of near-expiry products to charitable organizations. In Italy, the Group also participates in local initiatives, including beach clean-ups and educational projects in schools. Furthermore, the use of renewable energy has increased through Guarantee of Origin certification.

Sammontana organizes its sustainability path along three main commitment areas:

1. Health and well-being

- Improving the nutritional profile of its products and product safety compared to industry standards, while maintaining taste appeal
- Adapting recipes for specific dietary requirements (lactose-free, sugar-free, gluten-free, vegan, vegetarian)
- Reducing food waste across production, packaging and distribution, and donating near-expiry products to charitable organizations
- Ensuring staff safety and promote well-being through fair, inclusive and training-focused policies

2. Sustainable value chains

- Committing to animal welfare and responsible sourcing projects, covering both primary and secondary supply chains. For example, the Amando ice cream almond is governed by the Almond Code, setting rules on sustainability, biodiversity, resource use and value transfer
- Promoting certifications such as Rainforest Alliance, Fairtrade for cocoa and coffee, and Certified Sustainable Palm Oil (RSPO) for palm oil
- Developing a Supplier Code of Conduct with a questionnaire evaluating environmental, social and governance sustainability

3. Environment

- Decarbonization: reducing greenhouse gas emissions based on an ISO 14064 study, to be extended across the Group in 2025.
- Water management: optimizing water use, promoting reuse and reducing waste through reverse osmosis plants at Empoli and Vinci sites.
- Energy: improving energy efficiency and increase renewable energy use, with 70% of energy certified by Guarantee of Origin.
- Industrial waste: reducing landfill disposal, promote process circularity and waste sorting, and valorizing generated by-products.
- Packaging: reducing environmental impact through recyclable packaging and educating consumers on proper disposal.

Key inputs include raw materials such as wheat flour, palm oil, sugar, cocoa, milk and derivatives. Where possible, the Group sources these materials with certifications that ensure that both the supplier and the raw material are sustainable. Outputs include a range of ice cream and frozen pastry products, distributed nationally and internationally. Current benefits for customers include high-quality products and healthier options, such as lactose-free and gluten-free ice cream. Highlighted by the B Corp certification of Sammontana SB, the Group pursues both economic growth and social responsibility to deliver value to its shareholders and wider stakeholder community. These commitments and the Group's participation in local initiatives also generate benefits for other stakeholders, including communities.

Sammontana's **operations** cover key activities, starting with product development and ideation, followed by production processes, which include preparation of dough and mixes, product processing, freezing, packaging and quality control, and finally the storage of finished products. Sales activities include order collection, production planning, marketing and promotion, logistics and transportation. These processes are supported by corporate functions such as Human Resources, Finance, IT and Marketing.

The **upstream part of Sammontana's value chain** includes all suppliers, divided into three tiers that indicate their distance from the Group along the material flow. From tier 3 onward, which includes entities involved in the extraction or cultivation of raw materials, non-fossil resources are sourced from farms and large-scale livestock operations, while mineral and fossil resources originate from the metallurgical and petroleum industries. At tier 2, which includes companies that transform raw materials, food ingredients are both cultivated and processed. Agricultural products such as wheat, palm oil, sugar, milk, and cocoa are turned into semi-finished goods. Meanwhile, mineral and fossil raw materials are refined into industrial components, packaging materials, fuels, or machinery used in the energy sector. Finally, direct suppliers (tier 1) are the Group's actual commercial partners, providing semi-processed foods, packaging, industrial machinery, energy and services. This segmentation allows for the precise identification of ESG responsibilities along the entire supply chain, from the origin of the resources to the products arriving at the Group's facilities. The same applies to the downstream value chain.

The **downstream part of the value chain** includes all stages following production, organized into three tiers indicating their distance from the Group. Tier 1 covers the distribution of products to retailers and the HoReCa sector (hotels, restaurants, and catering), including refrigerated transport and storage. Tier 2 involves the sale of products directly to end consumers who purchase and enjoy Sammontana goods. Finally, tier 3 refers to end-of-life and waste management processes. This includes the disposal of food waste—which is all biodegradable and therefore has a lower environmental impact—and the collection, recycling, or energy recovery of packaging materials, which represent the most significant environmental burden. At this stage, waste collection services, recycling facilities, and, when necessary, waste-to-energy plants are involved.

SBM-2 – Interests and views of stakeholders

The main stakeholders identified by Sammontana include:

- Shareholders and investors
- Nature
- Future generations
- Employees
- Customers and consumers
- Suppliers
- Public authorities
- Universities and research centers
- Local communities
- Other relevant stakeholders

For the 2024 Sustainability Report, no new direct stakeholder engagement activities were carried out. However, the insights gathered during the 2023 engagement process carried out by the Group were used as a reference and are outlined below. Stakeholder perspectives on the Group's strategy and business model were previously explored through a structured consultation. This involved an online survey designed to assess a range of potentially relevant sustainability topics. These topics were grouped into four main categories: economic, governance, environmental, and social.

Each stakeholder had the opportunity to select and evaluate the topics considered most significant for Sammontana. The collected responses contributed to the double materiality assessment, particularly in the identification and assessment of impacts. Although the Group did not modify its strategy or business model as a result of this engagement, stakeholders' interests and opinions continue to be a key resource in guiding the sustainability management pathway.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Like many industrial companies, Sammontana's production processes naturally have environmental impacts. Producing ice cream and frozen pastry items requires significant amounts of energy, water, natural resources, and packaging materials. Refrigeration, which is essential for maintaining product quality and safety, is one of the main contributors to energy consumption and greenhouse gas emissions within the Group's operations.

The use of materials throughout the product life cycle leads to waste generation at multiple stages, both upstream, during the sourcing of raw materials, and downstream, through post-consumer packaging and unsold products. In the food sector, especially when it comes to agricultural raw materials, the value chain also has significant impacts on nature. These include biodiversity loss, soil and water pollution and potential social risks related to labour conditions and the rights of local communities in the countries of origin.

From a social standpoint, Sammontana acknowledges its responsibility as a major employer and is committed to fair and sustainable human resource management. The Group works to prevent negative impacts and actively supports employee well-being through initiatives focused on training, professional growth, and improving working conditions.

For the Group, it is also important to consider the potential negative impacts of its marketing practices and the indulgent nature of its products, particularly in relation to consumer health and well-being. To address these concerns, the Group has adopted an **Ethical Marketing Policy**, grounded in the principles of its Code of Ethics and aligned with national and international standards. This Policy outlines clear commitments to transparent, accurate, and responsible communication. It ensures that marketing messages are not misleading, promote a balanced diet, and specifically safeguard children by avoiding coercive advertising techniques.

Additionally, the Annex includes a complete list of material impacts, risks, and opportunities (IROs) identified through the double materiality assessment. Since 2024 marks the first year of reporting under the ESRS framework, there have been no changes compared to the previous period. All relevant aspects of the IROs are disclosed in compliance with the standards.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

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

In 2024, Sammontana carried out its first double materiality assessment, in line with the ESRS standards and the European Financial Reporting Advisory Group (EFRAG) guidelines. The process began with an assessment of the external context, identifying key macrorends affecting the food industry. This included regulatory developments, macroeconomic and scientific factors, as well as best practices from peers and sector benchmarks. At the same time, an internal analysis was conducted through interviews and a review of company documentation, focusing on resources, processes, people, and products. The assessment covered all core business activities, from product development and production to sales and support functions and mapped the entire value chain, from agricultural suppliers (up to tier 3+) to end consumers and product end-of-life. It also considered both operational geographies and the countries of origin of raw materials and target markets.

To assess the impacts linked to activities and business relationships, Sammontana used a numerical scale. For negative impacts, the evaluation considered both severity and likelihood; for positive impacts, it assessed scale, scope, and likelihood. Each parameter was rated from 1 to 5, with a relevance threshold set at **3.3**, above which impacts were deemed significant for reporting purposes. No direct stakeholder engagement was conducted during this phase, except for consultations with worker representatives at the Colognola, Empoli, and Vinci sites. However, the results from the 2023 engagement process were incorporated to support a more comprehensive evaluation.

Based on the identified impacts and the Group's key dependencies, including suppliers, raw materials, workforce, and the regulatory environment, Sammontana evaluated risks and opportunities that could have economic and financial consequences. For each item, the potential effect on financial statement components was estimated, along with its magnitude (expressed as a percentage change in EBITDA) and likelihood of occurrence. These were assessed using scales from 1 to 5 and 1 to 4, respectively. A relevance threshold of **3.5** was applied, above which risks and opportunities were classified as priority items.

Sources supporting the analysis included reports from international organizations (**WEF, ILO, UN, UNEP, FAO, IPCC**), sector standards (**SASB, draft ESRS**), past sustainability reports (Sammontana SB and Forno d'Asolo) and interviews with internal functions. A particularly significant contribution came from the **Chief Financial Officer**, who enabled the linkage of risks and opportunities to the Group's economic and financial outlook.

The process was coordinated by the **Head of Sustainability & Impact**, together with the dedicated operational team and was validated by the Board of Directors. Currently, Sammontana does not have a formalized internal control system dedicated to sustainability nor a standardized model for risk assessment, but the integration of Forno d'Asolo represents an opportunity to strengthen governance and develop tools capable of fully integrating sustainability into business management. The Group is also committed to reviewing and updating the materiality analysis annually, in line with the evolution of both the internal and external context.

IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement

To determine which material information should be disclosed, Sammontana identified a list of relevant Impacts, Risks, and Opportunities (IROs), applying the thresholds for impact and financial materiality as previously described. Based on the identified IROs, the Group determined the corresponding material topics, along with their related subtopics and sub-subtopics in accordance with ESRS 1, paragraph AR 16. The material topics guided the choice of applicable ESRS standards, while the subtopics and sub-subtopics helped pinpoint the specific disclosure requirements within each standard that are material to the identified IROs. For a complete overview of the disclosure requirements addressed in the Sustainability Report—including all data points derived from other EU regulations, as listed in Appendix B of ESRS 2—please refer to the ESRS Index on page 73.

ENVIRONMENTAL INFORMATION

CORPORATE POLICIES FOR ENVIRONMENTAL SUSTAINABILITY

Sammontana pursues a responsible and sustainable business model, integrating environmental and social aspects into its operational strategies. To this end, the Group has adopted two complementary policies: the **Environmental Policy** and the **Sustainability Policy**, which establish the guiding principles for managing the most relevant sustainability issues.

The **Environmental Policy**, under the responsibility of the Environmental Management, was inspired by the principles of ISO 14001 and the requirements contained in the environmental authorizations of the plants (AIA/AUA). The policy defines general objectives of regulatory compliance, pollution prevention and continuous improvement of environmental performance, promoting adherence to applicable European, national and local legislation and voluntary commitments undertaken by the Group. Planned actions include the monitoring and controlling of environmental risks, employee training and the adoption of methodological tools. Specific objectives concern the reduction of atmospheric emissions, improvement of wastewater management, reduction of waste generation, containment of water consumption, and management of odorous and fugitive emissions.

Sammontana's **Sustainability Policy**, developed by the Head of Sustainability & Impact and overseen by the same function, brings together environmental goals with social and value chain objectives. It aligns with key international frameworks, including the UN 2030 Agenda and Sustainable Development Goals (SDGs), the European Green Deal, the Farm to Fork strategy, Italy's Law 208/2015 on Benefit Corporations, and B-Corp standards, as well as the Group's Code of Ethics and Supply Chain Code of Conduct. The Policy is built around three core pillars: **Health and Well-being**, which focuses on delivering safe, high-quality products while promoting inclusion and healthy lifestyles; **Value Chain**, which emphasizes responsible and sustainable sourcing; and **Environmental Impact**, which targets emission reductions, efficient resource use, and circular production models.

Sammontana actively manages economic, social, and environmental risks across its entire value chain, from sourcing raw materials to delivering finished products, by promoting mitigation strategies that enhance resilience and sustainability. For critical raw materials such as cocoa, coffee, palm oil, cellulose, and wheat, the Group prioritizes sourcing through recognized certifications like Rainforest Alliance, RSPO, Forest Stewardship Council (FSC), and International Sustainability and Carbon Certification (ISCC) PLUS. These certifications play a key role in reducing operational, climate-related, regulatory, and reputational risks, while also ensuring decent working conditions and traceability. In contrast, the absence of such certifications could result in significant financial impacts, reduced supply chain resilience and reputational damage with customers and investors. To reinforce its commitments, Sammontana also applies the **Organizational Model 231**, which integrates ethical and social oversight with supply chain risk management.

The policies focus on four main areas:

- **Environmental protection and ecological transition:** reduction of greenhouse gas (GHG) emissions, efficient use of energy and raw materials, and minimization of product impacts across its life cycle;
- **Sustainable value chain development:** promotion of responsible practices along the value chain through codes of conduct, supply chain certifications and eco-design initiatives;
- **Responsible innovation and continuous improvement:** introduction of low-impact processes and technologies, monitoring of performance and updating of strategies in response to emerging risks, opportunities and regulations;
- **ESG governance integration:** inclusion of environmental, social and governance objectives in the management model, with transparency in reporting and alignment with international standards and ESRS guidelines.

These policies constitute the framework for operational actions, the definition of impact reduction targets and performance monitoring. In the subsequent thematic chapters (Climate Change, Pollution, etc.), the actions and metrics presented are consistent with the principles defined in these policies.

CLIMATE CHANGE

Sammontana monitors and manages climate-related impacts across its entire value chain— not only those directly linked to its core operations, but also those occurring upstream and downstream. This comprehensive approach helps identify priority areas for action. The Group carefully evaluates both physical risks, such as extreme weather events, and transition risks related to evolving regulations, technologies, and market conditions. At the same time, it considers the opportunities presented by a low-carbon economy. This approach strengthens Sammontana’s commitment to sustainable development, creating shared value for the environment, people, and local communities.

| Material IROs identified under E1 – Climate change |
|--|
| Impacts |
| GHG Emissions Scope 1 & 2 (core) – ACTUAL |
| GHG Emissions Scope 3 (up and down) – ACTUAL |
| Emissions Related to Refrigerant Gases (core and down) – ACTUAL |
| Intensive Energy Use in Production Processes (core) – ACTUAL |
| Risks |
| Damage to facilities and property, and/or to suppliers, caused by extreme events (core and up) |
| Disruptions in transport logistics caused by extreme events (down) |
| Fluctuations in fossil fuel prices (up) |

| Opportunities |
|---|
| Potential revenue increase due to the extension of the summer season (core) |
| Innovations in production processes and adoption of renewable energy sources (core) |

Table 2. Impacts, risks and opportunities under the topic “Climate change (E1)”

E1-1 – 1 Transition plan for climate change mitigation

Greenhouse gas (GHG) emissions generated by the Group’s activities can be divided into three categories, known as Scope 1, 2 and 3, based on their direct or indirect origin:

- **Scope 1:** direct emissions from sources owned or controlled by the Group (e.g., fuel combustion, use of refrigerant gases);
- **Scope 2:** indirect emissions from energy purchased and consumed by the Group (e.g., electricity, heat, steam);
- **Scope 3:** other indirect emissions related to the value chain, both upstream and downstream (e.g., supplier transportation, waste management, use of sold products).

As a Benefit Corporation, Sammontana has formally included in its bylaws the commitment to pursue five common benefit objectives, one of which is to support the ecological transition toward a decarbonized society. The Group is also aligned with benchmarks that are consistent with the Paris Agreement. To ensure its decarbonization targets are in line with the goal of limiting global warming to 1.5 °C, Sammontana conducted an Organizational Carbon Footprint (CFO) study in 2024, in accordance with the GHG Protocol and certified under ISO 14064.

Looking ahead to 2025, the Group plans to join the Science Based Targets initiative (SBTi), which provides standards and guidance for setting greenhouse gas reduction targets aligned with the Net-zero by 2050 pathway. The formal submission of targets is scheduled for 2025–2026, following the consolidation of the Organizational study, which designates 2024 as the base year for tracking, onwards from which the Group aims to progressively reduce emissions.

Thanks to the Organizational Carbon Footprint and Life Cycle Assessment (LCA) studies, Sammontana has identified priority intervention areas:

- **Thermal energy:** efficiency of production processes, reduction of consumption and planning for the procurement of methane gas from biogenic sources;
- **Electricity:** energy efficiency measures and the progressive expansion of electricity purchases certified with Guarantees of Origin, aimed at covering the Group’s entire energy demand by 2026;
- **Raw materials:** adoption of a Supplier Code of Conduct, use of supply chain certifications for the most impactful raw materials, implementation of eco-design approaches, recipe revision and selection of innovative packaging.

The objective is to build an integrated approach to emissions reduction that considers the entire product life cycle.

Moreover, the Group will progressively integrate into its reporting the requirements of the EU Taxonomy, ensuring the assessment of economic activities' compliance with the technical criteria and environmental objectives established at the European level.

The main challenges in achieving GHG reduction targets are:

- **Scope 1:** operational difficulties in electrifying certain production processes and cost and market availability barriers for bio-based fuels;
- **Scope 2:** the risk associated with rising costs of electricity from renewable sources;
- **Scope 3:** difficulties in obtaining specific data and promoting decarbonization initiatives along the supply chain, as these activities are not directly controlled by Sammontana.

The implementation of the activities outlined in the action plan has already led to tangible results, which are summarized in the overview table below:

| Scope | Emission type | Related actions/examples |
|---------|-----------------------------------|--|
| Scope 1 | Direct (company-owned/controlled) | Management of company fleets, reduction of fossil fuel use, management of refrigerant gases |
| Scope 2 | Indirect from purchased energy | Energy efficiency, purchase of renewable energy, monitoring of electricity and thermal consumption |
| Scope 3 | Indirect from the value chain | Optimization of supplier/customer logistics, reduction of packaging, waste management, sustainability of products/services |

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

In 2024, Sammontana conducted a **climate resilience analysis** across its operations and its upstream and downstream value chain. The analysis identified two main categories of risk:

- **Physical risks:** direct effects of climate change, such as increased frequency and intensity of extreme weather events (e.g., heatwaves, floods, droughts), which may compromise operational continuity, resource availability and infrastructure. In particular:
 - Damage to facilities, properties and infrastructure of the Group and its suppliers;
 - Disruptions in downstream logistics and distribution, with short-, medium- and long-term impacts.
- **Transition risks:** related to the shift towards a low-carbon economy, with potential impacts on regulations, costs, markets and competitiveness. The most significant risk

for Sammontana is the fluctuation of fossil fuel prices, with expected medium-term effects.

To assess transition risks, Sammontana adopted the IPCC **SSP1** scenario, which aligns with the Paris Agreement and the goal of limiting global warming to 1.5 °C. This scenario is based on key assumptions such as strong international cooperation, ambitious climate policies, a decarbonized energy mix, and the accelerated adoption of clean technologies and sustainable packaging.

For physical risks, the analysis used the **RCP 8.5** scenario, which reflects a future without climate mitigation efforts. This scenario considers the increasing frequency and intensity of extreme weather events and their potential impacts on:

- Availability and cost of agricultural raw materials;
- Operational continuity of plants;
- Logistics and distribution disruptions;
- Market dynamics.

The expected financial impacts were estimated based on their influence on operating costs, revenues, and assets, expressed as a percentage of EBITDA. The time horizons used for the analysis are aligned with ESRS 1 definitions. Key uncertainties include the evolution of climate conditions, the timing and scope of climate policies, volatility in raw material markets, and changing consumer preferences.

Implemented actions

- Integration of the resilience analysis into the ISO 14001 Environmental Management System, to monitor risks and opportunities (VCRO);
- Investments in adaptive capacity, including potential revision of the procurement strategy and continuous market monitoring.

IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities

Sammontana systematically identifies and evaluates relevant climate impacts, risks and opportunities through structured analysis and monitoring processes, as detailed in **SBM-3**. These processes cover the entire value chain and enable the integration of climate-related information into the Group's strategy and business model, ensuring that operational and investment decisions consider decarbonization priorities, climate resilience and sustainable development opportunities.

E1-2 – Policies related to climate change mitigation and adaptation

Sammontana's approach to managing climate change, as described in this chapter, is fully aligned with both its Environmental Policy and Sustainability Policy. For further details on

these policies, please refer to the chapter titled Corporate Policies for Environmental Sustainability (page 13).

E1-3 – Actions and resources related to climate change policies

In line with its Environmental and Sustainability Policies, Sammontana continuously monitors climate-related impacts across its entire value chain, integrating ESG objectives and promoting ongoing improvements in environmental performance. To effectively respond to the challenges of climate change, the Group has implemented concrete actions and planned initiatives aimed at managing its climate-related impacts, risks, and opportunities.

In 2024, Sammontana increased the share of electricity certified by Guarantees of Origin at its production sites in Empoli and Colognola ai Colli. The total purchase amounted to 22,005 MWh, helping to avoid approximately 10,000 tonnes of CO₂ equivalent emissions, calculated using the market-based approach.

Also in 2024, the Group sourced 4,650 tonnes of biogenic liquid carbon dioxide to replace fossil-based CO₂ at the Colognola ai Colli facility. This biogenic CO₂ is used in the bakery production process for dough cooling, contributing to the reduction of fossil CO₂ emissions released to the atmosphere.

Another initiative involves replacing refrigerant gases with low-GWP (Global Warming Potential) alternatives, to minimize greenhouse gas emissions in the event of accidental leaks from refrigeration systems.

Finally, Sammontana has launched a modernization plan for its production facilities to reduce energy consumption. Among the planned upgrades is the installation of new high-efficiency production lines: the bakery line is expected to be completed by the end of 2025, while the doughnut and pancake lines are scheduled to be operational in the first half of 2026. These improvements will contribute to lowering energy use and, consequently, reducing GHG emissions.

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

Sammontana has voluntarily committed to purchasing electricity certified by Guarantees of Origin (GO) for the portion of energy it procures, with the goal of reducing Scope 2 greenhouse gas (GHG) emissions. This initiative is fully aligned with the Group's **Sustainability Policy**, which promotes the use of low-impact, alternative energy sources.

The Group has set a clear target: to achieve 100% GO-certified electricity by 2026. This milestone marks a concrete step toward decarbonizing its production processes and reflects Sammontana's active role in supporting the energy transition and improving its environmental performance.

Since 2023, Sammontana has defined decarbonization targets for its direct operations and energy procurement (Scope 1 and Scope 2). In line with the GHG Protocol methodology, the Group has established a baseline for its climate-related emissions, expressed in tonnes of CO₂ equivalent, using 2016 as the reference year. To define organizational boundaries, Sammontana applies a hybrid approach that combines operational and financial control.

Scope 1 and Scope 2 emissions are reported for all activities under direct operational control. However, certain activities—such as the storage of finished products in leased facilities—are also included in the reporting perimeter due to the financial control exercised by the Group. This approach ensures a transparent and consistent representation of the Group’s emission responsibilities.

Currently, these targets do not include indirect emissions along the value chain (Scope 3). Following the expansion of the corporate perimeter through acquisitions, the Group has acknowledged the need to extend its commitment to its entire emissions inventory (Scope 1, 2, and 3).

Finally, Sammontana has set a goal for 2025 to formally commit to the **Science Based Targets initiative (SBTi)**, with the aim of defining short- and long-term GHG reduction targets grounded in climate science and aligned with the 1.5°C global warming pathway. The SBTi, jointly led by CDP, the UN Global Compact, the World Resources Institute (WRI), and WWF, promotes best practices in climate target setting and independently evaluates the ambition of submitted targets.

E1-5 – Energy consumption and mix

| Fuel consumption | UoM | 2024 |
|---|----------------------------|-------------|
| <i>Diesel</i> | MWh | 9,707 |
| <i>Gasoline</i> | MWh | 1,770 |
| <i>Natural gas</i> | MWh | 100,060 |
| <i>Propane</i> | MWh | 391 |
| <i>Coal</i> | MWh | 0 |
| Fuel consumption from fossil fuel sources | MWh | 111,928 |
| <i>Biofuels</i> | MWh | 0.061 |
| Fuel consumption from renewable sources | MWh | 0.061 |
| Energy purchased from fossil fuel sources | MWh | 32,361 |
| Energy purchased from renewable sources | MWh | 32,434 |
| Self-generated energy from renewable sources | MWh | 633 |
| Total energy consumed | MWh | 177,355 |
| Total energy consumed from fossil fuel sources | MWh | 144,288 |
| Total energy consumed from fossil fuel sources | % on total energy consumed | 81.4% |
| Total energy consumed from renewable sources | MWh | 33,067 |
| Total energy consumed from renewable sources | % on total energy consumed | 18.6% |

Table 3. Energy consumption and mix

During the 2024 fiscal year, the Sammontana Group recorded a total energy consumption of **177,355 MWh**. This figure includes the full-year operations of Sammontana SB and the final five months of operations for Forno d’Asolo. The energy mix comprises electricity and fossil

fuels (diesel, gasoline, propane, natural gas), primarily used for logistics, transportation, and specific production processes.

While these energy sources remain essential for ensuring operational continuity, their use presents significant environmental challenges—particularly in terms of greenhouse gas emissions and overall industrial energy efficiency.

As part of its decarbonization strategy, the Group has launched a structured pathway aimed at improving energy efficiency and progressively replacing fossil fuels wherever technically and economically feasible. As of today, **over 50% of the electricity purchased by the Group comes from renewable sources certified by Guarantees of Origin (GO)**. This milestone marks an intermediate step toward Sammontana’s strategic goal: **sourcing 100% of its electricity from certified renewable sources by 2026**. The adoption of low-emission energy sources is a tangible lever for reducing indirect GHG emissions and enhancing environmental performance across the value chain.

Continuous consumption monitoring, production process optimization, and the integration of ESG criteria into energy-related decision-making, are the cornerstones of the Group’s energy management strategy.

| | UoM | 2024 |
|------------------------------|-----------|------------|
| Total energy consumed | MWh | 181,316.40 |
| <i>Net revenue</i> | mln € | 667.32 |
| Energy intensity | MWh/mln € | 271.71 |

Table 4. Energy intensity

In 2024, the Group reported an energy intensity of 271.71 MWh per million euros of consolidated revenue. This figure reflects the energy-intensive nature of the Group’s operations, which fall within high environmental impact sectors as classified under NACE (Annex I of EU Delegated Regulation 2022/1288).

Both energy consumption and revenue figures refer to the full scope of the Group, providing a comprehensive and representative view of its energy and economic footprint.

E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions

Sammontana’s CO₂ emissions have been calculated in accordance with the international ISO 14064 standard, ensuring transparency and comparability of the data. The analysis includes Scope 1 emissions, which refer to direct emissions from fuel consumption, and Scope 2 emissions, reported using both the market-based and location-based approaches.

| Scope 1 | | | |
|--|---------------|------------|----------------------|
| Direct GHG emissions and removals | Kg | ton | % of Scope(s) |
| Direct emissions from natural gas | 25.606,903.00 | 25,606.90 | 42.65% |
| Direct emissions from diesel | 3,337.17 | 3.34 | 0.01% |
| Direct emissions from propane | 444,693.24 | 444.69 | 0.74% |
| Direct emissions from company-owned diesel vehicles (Transfrigo) | 1,081,328.90 | 1,081.33 | 1.80% |

| | | | |
|--|----------------------|------------------|-------------|
| Direct fossil CO ₂ emissions | 3,223,040.00 | 3,223.04 | 5.37% |
| Direct biogenic CO ₂ emissions | 4,650,466.00 | 4,650.47 | 7.75% |
| Fugitive emissions from refrigeration systems | 22,862,943.00 | 22,862.94 | 38.02% |
| Direct emissions from leased and company-owned gasoline vehicles | 542,831.58 | 542.83 | 0.90% |
| Direct emissions from leased and company-owned methane vehicles | 401,843.61 | 401.84 | 0.67% |
| Direct emissions from leased and company-owned diesel vehicles | 1,244,331.90 | 1,244.33 | 2.07% |
| Direct emissions from leased and company-owned HVO vehicles | 17,619.19 | 17.62 | 0.03% |
| Direct GHG emissions and removals | 60,079,337.59 | 60,079.43 | 100% |
| Scope 2 | | | |
| Indirect GHG emissions from acquired energy (market-based) | 13,998,409.99 | 13,998.41 | 100% |
| Indirect GHG emissions from acquired energy (location-based) | 28,487,947.00 | 28,487.95 | 100% |
| Total scope 1 and 2 emissions (market-based) | 74,077,747.58 | 74,077.84 | 100% |
| Total scope 1 and 2 emissions (location-based) | 88,567,284.59 | 88,567.38 | 100% |

Table 5. GHG emissions

In 2024, Sammontana was unable to calculate its Scope 3 greenhouse gas (GHG) emissions due to the mid-year acquisition of Forno d'Asolo, which significantly altered the Group's organizational boundaries. This integration posed challenges to consolidating value chain data, temporarily limiting access to the information needed for an accurate estimate of Scope 3 indirect emissions.

E1-7 – GHG removals and GHG mitigation projects financed through carbon credits

Throughout 2024, the Group did not carry out any greenhouse gas removal activities, nor did it purchase carbon credits to finance emission mitigation projects.

E1-8 – Internal carbon pricing

The Group does not currently apply an internal carbon pricing mechanism.

POLLUTION

| Material IROs identified under E2 – Pollution |
|---|
| Impacts |
| Soil pollution at suppliers’ production sites (up) – ACTUAL |
| Air pollution at suppliers’ production sites (up) – POTENTIAL |
| Pollution from plastic packaging production (down) – POTENTIAL |
| Water pollution at suppliers’ production sites (up) – POTENTIAL |
| Pollution from substances of concern or of very high concern (e.g., ammonia used as a cooling agent) (core) – POTENTIAL |

Table 6. Impacts, risks and opportunities under the topic “Pollution (E2)”

IRO-1 – Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

As part of its commitment to environmental sustainability, Sammontana carried out a structured assessment to identify and evaluate actual and potential impacts, risks, and opportunities related to pollution, covering both its own operations and the entire value chain, both upstream and downstream.

The analysis was conducted within the framework of the double materiality assessment and combined technical-environmental evaluations with data from internal monitoring systems. At the operational level, a systematic review of production sites was performed, with particular focus on the **chemical substances register**, to evaluate the use of **substances of concern** or **of very high concern (SVHC)**. These substances were found exclusively within Sammontana’s own operations and are subject to regular monitoring.

Sites subject to **Integrated Environmental Authorization (AIA)** were also assessed against the emission thresholds set out in Annex II of the **E-PRTR** Regulation, with reference to air, water, and soil pollutants. The analysis confirmed full regulatory compliance, with the exception of **greenhouse gas emissions**, which are reported separately under **ESRS E1**.

No specific consultations were conducted with external stakeholders or potentially affected communities regarding pollution-related topics. Nonetheless, the **actual negative environmental impacts** were mapped across the entire value chain, without identifying any material financial risks or opportunities.

- **Upstream:** Significant impacts were identified at supplier sites, particularly related to the use of **chemical fertilizers** and other agricultural practices affecting soil and ecosystems. Air pollution was mainly linked to emissions from intensive livestock farming and transportation activities, while water pollution was associated with wastewater management and the possibility of leaks during extreme weather events.
- **Own operations:** A potential negative impact was identified concerning the use of **ammonia** in refrigeration systems, as it is classified as a substance of concern.

Although current containment and control systems significantly mitigate the risk, any accidental release could have harmful environmental consequences.

- **Downstream:** An impact was observed related to the **dispersion of microplastics** at the end-of-life of plastic packaging. This impact is partially mitigated by the progressive adoption of **recyclable paper packaging** for certain product lines, such as Barattolino Sammontana.

Overall, the analysis confirmed that the most significant pollution-related environmental impacts, stem from the upstream and downstream phases of the value chain. No financially material risks were identified within Sammontana's own operations. Nonetheless, the Group continues to monitor these aspects in line with its objectives of reducing environmental impact and transitioning toward more sustainable production practices.

E2-1 – Policies related to pollution

Sammontana manages its environmental impacts, including those related to pollution, through its **Environmental Policy** and **Sustainability Policy**, both of which apply across the entire Group and are aligned with its corporate commitments to environmental protection and sustainable development.

The **Environmental Policy**, overseen by the Director of Industrial Operations, Environment and Safety, sets out objectives for regulatory compliance, pollution prevention, and continuous improvement of environmental performance. It ensures adherence to environmental legislation and voluntary standards, and promotes risk prevention through monitoring, training, and methodological tools. Specific targets include reducing atmospheric emissions, improving the quality of wastewater discharges, minimizing waste generation, lowering water consumption, and managing odorous and fugitive emissions.

The **Sustainability Policy** complements the environmental dimension with social and supply chain considerations. It promotes responsible sourcing within key agri-food supply chains and the use of sustainable packaging, with the aim of minimizing impacts on soil, water, and air emissions.

For further details on these policies, please refer to the chapter titled Corporate Policies for Environmental Sustainability (page 13).

Both policies take stakeholder interests into account and are supported by the Group's **Environmental Management System**, which includes operational procedures designed to prevent and mitigate potential environmental emergencies, thereby safeguarding water, air, and soil resources.

E2-2 – Actions and resources related to pollution

Within its own operations, Sammontana has identified the potential environmental impact associated with ammonia leaks from refrigeration systems. To address this, the Group has developed a dedicated manual that consolidates key technical and organizational guidelines. The document covers several areas, including employee training on safe behaviour, operational procedures for refrigeration technicians, and the management of the automatic

leak detection system. It also outlines first-aid measures to be followed when necessary, providing a clear and consistent reference for all personnel involved.

E2-3 – Targets related to pollution

At present, the Group has not defined specific quantitative or qualitative targets for managing pollution-related impacts, risks, and opportunities (IROs), as outlined under ESRS E2. However, Sammontana acknowledges the strategic importance of integrating measurable objectives into its environmental management system and is committed to evaluating the adoption, in the medium term, of metrics and indicators aligned with leading reporting standards and with continuous improvement goals for environmental performance.

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

The responsible management of substances of concern and substances of very high concern is a central element of Sammontana’s environmental strategy, particularly in relation to pollution prevention and the safeguarding of human health and ecosystems. In line with ESRS E2 requirements, the Group monitors the use—and, where applicable, the production—of these substances within its manufacturing processes. The goal is to ensure regulatory compliance, minimize environmental impacts, and promote the safe and sustainable use of chemical resources.

This disclosure focuses on substances classified as substances of concern or of very high concern under European legislation (e.g., REACH), with particular attention to those used in refrigeration systems and other critical technical processes. For the current reporting year, Sammontana was unable to collect quantitative data on these substances, as such metrics are not currently required by applicable regulations and are not routinely tracked for operational or management purposes.

WATER AND MARINE RESOURCES

| Material IROs identified under E3 – Water and marine resources |
|--|
| Impacts |
| Water withdrawal for production sites (core) – ACTUAL |
| Water consumption in production processes (core) – ACTUAL |
| Water withdrawal by production sites located in water-stressed areas (core) – ACTUAL |
| Improperly managed water withdrawal (up) – POTENTIAL |

Table 7. Impacts, risks and opportunities under the topic “Water and marine resources (E3)”

IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

Sammontana has conducted a systematic assessment of its production sites and operational activities to identify and evaluate actual and potential IROs related to water use—recognizing the water-intensive nature of the food sector, and ice cream manufacturing in particular.

At the operational level, the Group faces significant environmental impacts linked to water withdrawal and consumption at its facilities. If not properly managed, water withdrawal can place pressure on local ecosystems, especially in areas experiencing water stress. Two of Sammontana’s plants have been identified as operating in regions classified as vulnerable in terms of water availability. Moreover, the high water consumption typical of the food industry—and especially ice cream production—adds further environmental pressure. Water is used throughout various stages of production, including recipe formulation, line cleaning, cooling, and condensation in refrigeration systems, all of which directly affect natural resources.

Upstream, potential negative impacts have been identified in relation to water withdrawal by suppliers, particularly in agriculture, livestock farming, and raw material processing—sectors known for their high water intensity. Poor water management in these areas can contribute to the degradation of aquatic ecosystems and reduce water availability for local communities.

No financially material risks or opportunities have been identified in relation to water use. All impacts observed have been classified as negative and actual, except for the upstream impact, which is considered potential.

The Group acknowledges the strategic importance of sustainable water management and is committed to progressively strengthening its monitoring and mitigation systems.

E3-1 – Policies related to water and marine resources

Water resource management is explicitly addressed in both the Environmental Policy and the Sustainability Policy.

The **Environmental Policy** sets specific objectives to reduce water consumption at production sites, improve the quality of wastewater discharges, and monitor water usage. Water efficiency is considered a strategic priority, with concrete actions such as reducing withdrawals from wells, surface water, and municipal networks; applying **Life Cycle**

Assessment (LCA) methodology to evaluate the water footprint of products throughout their life cycle; and integrating eco-design principles.

Under the “Reducing Environmental Impact” pillar, the **Sustainability Policy** promotes initiatives aimed at lowering water consumption in production processes and encourages the sourcing of raw materials from certified supply chains, with the goal of mitigating water-related impacts across the entire value chain. The LCA methodology enables the monitoring of product environmental performance, with a specific focus on water use and the design of lower-impact solutions.

Both policies incorporate stakeholder interests and promote a structured, responsible approach to water management. Sammontana also recognizes the opportunity to strengthen its water consumption strategy in water-stressed areas, further enhancing environmental resilience.

E3-2 – Actions and resources related to water and marine resources

The Group has launched a series of concrete actions—both operational and planned—aimed at improving the efficiency and sustainability of water resource management. These initiatives directly address the environmental impacts identified and align with Sammontana’s broader sustainability commitments. The focus is on reducing water consumption, optimizing treatment processes, and increasing water reuse, with particular attention given to production sites located in water-stressed areas.

Implemented actions

The Group has implemented a range of operational measures to improve water management across its production sites, focusing on reducing consumption, monitoring withdrawals, and enhancing wastewater quality. These actions form part of an integrated approach to environmental sustainability and directly address the impacts identified under ESRS E3.

One key initiative completed in 2024 was the upgrade (revamping) of the wastewater treatment system at the Colognola ai Colli site. The objective was to improve the quality of discharged water, with a particular focus on reducing chloride concentrations. This enhancement has improved treatment performance, reduced pressure on local aquatic ecosystems, and strengthened compliance with environmental standards.

Another important measure currently underway is the installation of flow meters at all production sites. Scheduled for completion in 2025, this initiative will enable precise monitoring of water consumption across the Group’s industrial operations. It will support the identification of high-intensity processes and areas, laying the foundation for targeted efficiency improvements and reductions in water withdrawals.

Planned actions

The Group has outlined a series of short-term initiatives to further strengthen sustainable water management, particularly at sites located in areas of high water stress. All planned actions are scheduled for implementation in 2025.

At the Empoli site, a reverse osmosis system will be installed to improve the quality of water used in refrigeration systems. Enhanced water quality will reduce the frequency of purging, thereby lowering both water withdrawals from wells and discharges into the sewer system. This intervention combines reduced consumption with improved internal reuse.

A similar project is planned for the Vinci site, which is also located in a critically water-stressed area. In addition to installing a reverse osmosis system, the site will upgrade its wastewater treatment system. The aim is to increase the share of water reused in cooling processes, maintain stable intake and discharge volumes, and improve environmental performance indicators per unit of product.

At the Maser site, flow meters will be installed to improve traceability of water consumption and discharges, with a focus on high-intensity processes. This initiative, also scheduled for 2025, is designed to support more informed, data-driven water management and reduce overall usage.

Finally, the “Almond Code” project is a supply chain initiative that will monitor and certify the sustainability of Sicilian almond production used in the Amando product line. The protocol includes water consumption monitoring across the entire supply chain, aiming to minimize waste and promote low-impact resource use. Launching in 2025, the initiative will encourage more sustainable agricultural practices upstream.

E3-3 – Targets related to water and marine resources

The Group has set voluntary targets for water resource management, in alignment with its Environmental and Sustainability Policies. These targets aim to progressively reduce the water footprint of its production activities and promote more efficient and responsible water use across the value chain.

The first target focuses on reducing water withdrawals at the Group’s production sites. This commitment, directly linked to the Environmental Policy, applies to all facilities located in Italy that were part of the Group prior to the acquisition of Forno d’Asolo.

Progress is tracked using the indicator “cubic meters per ton of finished product” (m³/t), a relative metric that allows the Group to assess water efficiency in relation to actual production volumes.

| Production site | Water intensity (mc/t) FY 2021 | Water intensity target (mc/t) FY2025 |
|--------------------|--------------------------------|--------------------------------------|
| Empoli | 7,500 mc/t | 6,900 mc/t |
| Vinci | 3,276 mc/t | 3,100 mc/t |
| Colognola ai Colli | 7,256 mc/t | 6,500 mc/t |

Table 8. Water intensity in FY 2021 and related reduction targets for each production site

The second voluntary target focuses on selecting raw materials with a low water footprint. This commitment, part of the Group’s Sustainability Policy, applies to the entire supply chain—both primary and secondary. The objective is to integrate water sustainability criteria into supplier selection processes, with particular emphasis on agricultural supply chains, in order to reduce the indirect water footprint of products. Although quantitative benchmarks have not

yet been established, the initiative is currently underway and will be progressively integrated into the Group’s traceability and supply chain reporting systems.

To assess exposure to water-related risks, particularly in water-stressed areas, the Group conducted an analysis using the AQUEDUCT Water Risk Atlas platform. This tool evaluates water stress levels based on the ratio between total water demand and available renewable resources in the regions where Sammontana operates. The analysis revealed that the Empoli and Vinci sites are located in areas classified as extremely high water stress, while other sites—such as Maser and Jesolo—fall within medium-high stress zones.

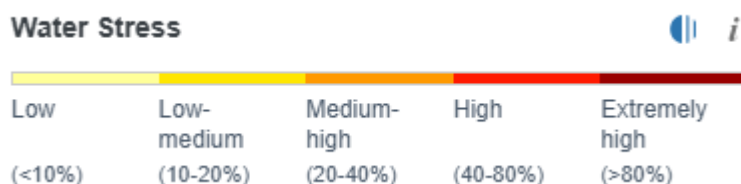


Figure 1. Legend of water stress (Source: AQUEDUCT Water Risk Atlas)

In response to this critical issue, the Group has planned specific interventions, including the installation of reverse osmosis systems at the Empoli and Vinci plants. These systems aim to reduce water intake and improve the efficiency of cooling processes. Water consumption at these sites is monitored monthly using the indicator m³/t, ensuring continuous oversight and enabling timely corrective actions.

All the objectives outlined above are voluntary and not driven by regulatory requirements. They reflect the Group’s proactive and responsible approach to water resource management, in line with its commitment to continuous improvement and stakeholder expectations regarding environmental sustainability.

E3-4 – Water consumption

During the year 2024, total water consumption across the Group’s production sites reached 269,794 m³. This figure was calculated as the difference between total inflows (961,377 m³) and outflows (691,583 m³), as shown in Table 9. The data includes both Sammontana and Forno d’Asolo facilities (excluding Lizzi S.r.l.).

Sammontana accounted for the vast majority of water usage, consuming 265,952 m³, while Forno d’Asolo reported a significantly lower figure of 3,842 m³. Following the acquisition of Forno d’Asolo, its contribution was proportionally adjusted to reflect the actual consolidation period within the fiscal year.

| Company | Water withdrawn (m ³) | Water discharged (m ³) | Water consumption (m ³) |
|---------------|-----------------------------------|------------------------------------|-------------------------------------|
| Sammontana | 679,476 | 413,524 | 265,952 |
| Forno d’Asolo | 281,901 | 278,059 | 3,842 |
| Total | 961,377 | 691,583 | 269,794 |

Table 9. Water consumption during FY2024 (m³)

Particular attention has been given to sites located in water-stressed areas, such as Empoli and Vinci, where total water consumption reached 152,041 m³. In these contexts, the sustainable management of water resources is of strategic importance, especially considering the increasing pressure on local ecosystems.

| Production site | Water withdrawn (m ³) | Water discharged (m ³) | Water consumption (m ³) |
|-----------------|-----------------------------------|------------------------------------|-------------------------------------|
| Empoli | 279,146 | 144,069 | 135,077 |
| Vinci | 46,044 | 29,080 | 16,964 |
| Total | 325,190 | 173,149 | 152,041 |

Table 10. Water consumption in water-stressed areas during FY2024 (m³)

The Group's water supply primarily comes from public aqueducts and wells, with a minor contribution from surface water at the Maser plant. Wastewater is largely discharged into the public sewer system following biological treatment, while a residual portion is released back into the environment through retention basins after treatment and periodic analytical monitoring to ensure compliance with quality standards.

Reported figures were mainly obtained through flow meters installed at production sites. For facilities where complete direct measurements were unavailable (Maser and Jesolo), estimates were derived using industry benchmarks and internal historical data. These estimates were developed conservatively, considering the operational characteristics of each site. The data has not been validated by third parties beyond the assurance service provider.

Water consumption calculations followed industry's widely accepted practices. Key assumptions included the constancy of flows during reference periods and the absence of significant unaccounted losses. Margins of uncertainty were minimized through cross-checks with energy consumption, production volumes, and seasonal operational patterns.

BIODIVERSITY AND ECOSYSTEMS

| Material IROs identified under E4 – Biodiversity and ecosystems |
|--|
| Impacts |
| Change in land use by raw material suppliers (up) – ACTUAL |
| Biodiversity loss due to soil and water pollution (up) – POTENTIAL |
| Impact on species (up) – POTENTIAL |
| Risks |
| Risk of business disruption and/or reputational damage resulting from environmental harm and its impact on biodiversity (up) |

Table 11. Impacts, risks and opportunities under the topic “Biodiversity and ecosystems (E4)”

E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model

The Group has not yet performed a dedicated resilience analysis on biodiversity and ecosystems, as required by ESRS E4-1. However, the double materiality assessment conducted in 2024, covering the entire value chain, identified significant risks in the upstream segment, particularly related to land-use change, pollution, and habitat loss. Based on these findings, the Group intends to further investigate this area in the next reporting cycle, including the potential implementation of a specific resilience analysis.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The Group has not identified any significant impacts from its direct operations. As currently structured, its activities do not exert substantial pressure on natural ecosystems or biodiversity at sites owned or directly controlled by the Group. Consequently, no biodiversity priority sites have been identified in line with ESRS standards. The Group will continue to monitor the evolution of its operations and related environmental impacts, maintaining a precautionary and proactive approach to managing biodiversity-related risks, including in anticipation of potential future regulatory or operational changes.

IRO-1 – Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities

As part of the double materiality assessment, the Group assessed impacts, dependencies, risks, and opportunities related to biodiversity across the entire value chain, with a particular focus on sourcing agricultural and livestock raw materials. The most significant impacts identified include intensive land use, soil and water pollution from fertilizers and livestock waste, loss of natural habitats, and pressure on species—especially in non-EU countries. These issues create critical dependencies on ecosystems, whose degradation could compromise supply continuity and affect the Group’s reputation. In response, the Group plans to strengthen monitoring of agricultural practices and enhance engagement with suppliers in the coming years.

E4-2 – Policies related to biodiversity and ecosystems

The Group does not yet have a policy specifically dedicated to biodiversity and ecosystems. However, Sammontana's **Sustainability Policy** provides the overarching framework within which principles relevant to biodiversity protection are embedded.

The pillars of **Sustainable Supply Chains** and **Environmental Impact Reduction**, outlined in the Sustainability Policy, address biodiversity-related issues. The "Sustainable Supply Chains" pillar promotes responsible sourcing by prioritizing certified and traceable suppliers across key agricultural and food supply chains. This approach indirectly mitigates environmental risks associated with land use, deforestation, and natural resource management. The "Environmental Impact Reduction" pillar includes initiatives related to decarbonization, water and energy efficiency, and the use of eco-friendly materials, which can have positive indirect effects on ecosystem conservation.

The Group also participates in various third-party initiatives and standards that, while not exclusively focused on biodiversity, promote sustainable practices throughout the supply chain. These include the European Green Deal, the Farm to Fork strategy, and certifications such as RSPO, Rainforest Alliance, FSC, ISCC Plus, and Organic. These certifications ensure, among other things, the traceability of raw materials and compliance with environmental criteria that support biodiversity protection.

Stakeholder interests have been considered in defining and periodically reviewing the Sustainability Policy, which is publicly available on the corporate website.

However, the current policy does not specifically address:

- the management of material impacts, dependencies, and risks related to biodiversity and natural resources;
- social consequences and dedicated monitoring mechanisms.

The absence of a dedicated biodiversity policy reflects the fact that the topic had not emerged as material in previous assessments. Following the recent double materiality assessment, which highlighted significant impacts in the procurement phase, Sammontana has recognized the need to integrate biodiversity into its strategic framework and is committed to addressing this topic during 2025, in line with ESRS E4 requirements.

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

Although Sammontana does not currently have specific operational measures to manage biodiversity-related impacts, risks, and opportunities, the Group has planned two initiatives to be launched in 2025. These actions mark the first step toward a structured and proactive approach to ecosystem protection.

The first initiative consists of the introduction of the "Almond Code", a voluntary guideline that will govern the production of Sicilian almonds used in the Amando ice cream line starting in 2025. This initiative aims to ensure transparency and sustainability throughout the supply chain by promoting agricultural practices that respect local ecological balances. It includes

the implementation of an environmental monitoring system to assess biodiversity in almond orchards and guide potential improvement actions.

The second initiative, “Oasi Sammontana”, will be launched in collaboration with 3Bee and Persea. The project involves creating a Biodiversity Oasis in Sardinia by planting 1,500 trees from 11 native nectar-producing species to support pollinators and restore an agriculturally significant area. Linked to the launch of the Mielissa croissant, this initiative represents a direct ecological regeneration effort and actively engages consumers and retailers through awareness campaigns and symbolic tree adoption. Using 3Bee’s digital technologies, habitat conditions and the Oasis’s development will be monitored in real time, ensuring transparent and ongoing management of environmental resources.

Both initiatives lay the foundation for a long-term biodiversity strategy, which Sammontana intends to progressively develop and strengthen in the coming years.

E4-4 – Targets related to biodiversity and ecosystems

Although the Group does not yet have specific biodiversity targets, it recognizes the growing strategic importance of the issue and intends to define, in the short term, measurable targets aligned with major international standards, in order to integrate biodiversity protection and ecosystem resilience into its sustainability strategies.

RESOURCE USE AND CIRCULAR ECONOMY

Table 12. Impacts, risks and opportunities under the topic “Resource use and circular economy (E5)”

| Material IROs identified under E5 – Resource use and circular economy |
|--|
| Impacts |
| Waste generation during production processes (core) – ACTUAL |
| Sourcing of food and material resources (core) – ACTUAL |
| Waste generation upstream in the value chain (up) – ACTUAL |
| Waste generation downstream in the value chain (down) – ACTUAL |
| Development of products with an eco-design approach (core) - ACTUAL |
| Risks |
| Sourcing of resources from geopolitically unstable areas (up) |
| Opportunities |
| Economic gain opportunities from monitoring and selling production process waste (core-down) |
| Opportunities to enhance brand image and increase sales through the development of products with an eco-design approach (core) |

IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

Following the double materiality assessment, the Group identified negative impacts related to raw material sourcing, the intensive use of plastic for packaging, and waste generation at production sites. Positive impacts were also observed, stemming from the adoption of circular economy practices, such as the recovery of food waste for biogas production.

Along the value chain, negative impacts include:

- **Upstream:** waste generated by suppliers, particularly from agricultural and processing activities;
- **Downstream:** post-consumer waste associated with end-customer packaging.

Positive impacts include the adoption of eco-design principles in product development, which deliver both environmental benefits and strategic advantages for the brand.

From a financial perspective, the main risk relates to sourcing from geopolitically unstable areas, which could lead to higher costs and supply chain disruptions. Conversely, opportunities arise from initiatives such as converting production waste into biofuel and introducing eco-designed products, which enhance sustainability performance, strengthen brand reputation, and support sales growth.

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

The Group’s policies incorporate circular economy principles. The Environmental Policy promotes eco-design to reduce waste and enhance product sustainability. The Sustainability Policy encourages responsible sourcing and the use of secondary or certified raw materials, thereby minimizing environmental impact across the entire supply chain. Additionally, the Group prioritizes recyclable or recycled packaging.

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

Sammontana has launched several concrete initiatives to manage the impacts, risks, and opportunities associated with the circular economy:

- Recovery of food waste for biogas production;
- Lean Manufacturing SLIM project (“Sammontana Lavorando Insieme Migliora”) to reduce waste and optimize production processes;
- Donation of near-expiry products through a partnership with Regusto;
- Reduction and replacement of plastic in packaging with recycled or FSC- and ISCC PLUS-certified materials;
- Collaboration with Revet to recycle post-consumer materials into low-impact furniture;
- Support for environmental cleanup initiatives such as “Spiagge e Fondali Puliti” and Clean Up the Med;
- Implementation of the “Almond Code” starting in 2025 to ensure traceable and sustainable supply chains, including monitoring of circularity and emissions.

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

Although specific targets have not yet been formalized, Sammontana intends to define measurable goals by 2026 to reduce waste, increase recycled content in packaging, and optimize production processes, with continuous monitoring of environmental performance.

E5-4 – Resource inflows

| | Unit | 2024 |
|---|------|---------|
| Total weight of organic products and materials used | Ton | 110,911 |
| Total weight of technical products and materials used | Ton | 3,382 |
| Percentage of sustainably sourced organic materials (certified) | % | 28% |
| Absolute weight of recycled components | Ton | 12,551 |
| Percentage weight of recycled components | % | 11% |

Table 13. Resource inflows

In 2024, the majority of raw materials used by the Group were of organic origin (110,911 tons), with 28% certified as sustainably sourced. Recycled secondary materials accounted for 12,551 tons (11%).

E5-5 – Resource outflows

| | Unit | 2024 |
|--|------|----------|
| Total amount of waste generated | Ton | 12,123.3 |
| Amount of waste diverted from disposal | Ton | 11,625.2 |
| Amount of hazardous waste diverted from disposal | Ton | 501.4 |
| Types of recovery operations | | |
| Preparation for reuse | Ton | 501.4 |
| Quantity of non-hazardous waste diverted from disposal | Ton | 11,123.8 |

| | | |
|--|-----|---------|
| Types of recovery operations | | |
| Preparation for reuse | Ton | 5,045.8 |
| Recycling | Ton | 6,078 |
| Amount of waste directed to disposal | Ton | 498.1 |
| Amount of hazardous waste directed to disposal | Ton | 84.9 |
| Types of treatment | | |
| Other types of treatment | Ton | 84.9 |
| Amount of non-hazardous waste directed to disposal | Ton | 413.2 |
| Types of treatment | Ton | |
| Landfill | Ton | 144.1 |
| Incineration | Ton | 269.1 |
| Total amount of non-recycled waste | Ton | 229 |
| Percentage of non-recycled waste | % | 1.9% |

Table 14. Waste generated

A total of 12,123 tons of waste was generated, of which 11,625 tons (approximately 97%) were diverted from disposal through recycling or reuse. Only 1.9% of the waste was not recycled. The Group actively monitors waste and packaging streams and manages out-of-service refrigerators and tertiary materials such as pallets, contributing to a high level of circularity within its production processes.

SOCIAL INFORMATION

OWN WORKFORCE

| Material IROs identified under S1 – Own workforce |
|---|
| Impacts |
| Secure employment (core) – ACTUAL |
| Respect for and protection of working hours (core) – ACTUAL |
| Professional development and technical training initiatives (core) – ACTUAL |
| Promotion of freedom of association (core) – ACTUAL |
| Workplace accidents within production processes (core) – ACTUAL |
| Lack of wage adjustment (core) – POTENTIAL |
| Failure to prevent an unfair or discriminatory work environment (core) – POTENTIAL |
| Incidents of discrimination (core) – POTENTIAL |
| Lack of promotion of freedom of association in US plants (core) – POTENTIAL |
| Partial coverage of foreign workers under collective agreements (core) – ACTUAL |
| Risks |
| Risk of legal actions resulting from workplace accidents within production processes (core) |

Table 15. Impacts, risks and opportunities under the topic “Own workforce” (S1)

SBM-2 – Interests and views of stakeholders

Every year, Sammontana conducts training activities focused on workers’ rights, with specific attention to maternity/paternity, trade union freedom, paid leave, and holiday entitlements, complemented by discussion sessions with the HR team. The Group also promotes organizational climate and Diversity, Equity & Inclusion (DE&I) surveys, providing employees with opportunities to share feedback. In addition, a corporate app delivers short training content on sustainability, the Code of Ethics, human rights, and DE&I, ensuring that staff remain informed about company updates.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Sammontana considers all workers potentially exposed to significant impacts, grouped as follows:

- **Direct employees:** permanent, fixed-term, seasonal and temporary workers, including production operators, quality and process controllers, clerical staff, technicians, managers and executives;
- **Self-employed workers and external collaborators:** professionals and consultants;

- **Agency workers provided by third parties:** mainly engaged in seasonal or logistics activities.

Main **positive social impacts** include:

- **Secure employment:** stable and long-term contracts;
- **Respect for working hours:** protection of work-life balance;
- **Training and professional development:** cross-functional and specialist courses (e.g. English language, whistleblowing, sustainability, diversity and inclusion, “Course 5.0”), updated based on feedback and available both in-person and online;
- **Freedom of association:** promotion and protection of trade union freedom across all sites.

Potential negative social impacts include:

- **Workplace accidents,** including those linked to human-machine interaction and exposure to chemicals;
- **Lack of wage adjustment and fair economic recognition, which** may affect workers’ well-being;
- **Discrimination and non-inclusive environment,** with potential episodes based on gender, ethnicity, sexual orientation, religion, age, disability or other factors;
- **Inadequate protection of workers’ rights outside of the EU,** including lack of freedom of association and collective bargaining.

These negative impacts may result in **financial and reputational risks**, particularly in cases of workplace accidents that lead to costly legal disputes. Sammontana manages these risks through preventive and corrective measures, aiming to ensure **safe, fair and inclusive working conditions**.

S1-1 – Policies related to own workforce

The Group promotes a people management model rooted in respect, participation, and talent development. The people management model is fully aligned with ESG and B Corp principles. To this end, the Group has adopted a range of policies designed to responsibly manage the impacts, risks, and opportunities related to its workforce.

- **Code of Ethics:** establishes general principles of conduct such as transparency, respect, legality and inclusion, and sets specific objectives including people development, workplace safety, and compliance with laws and rights. Implementation is supervised by the Chief Executive Officer. The Code is inspired by national and international regulations and standards (Legislative Decree 231/2001, ISO 14001:2015, GDPR, Legislative Decree 81/08, Confindustria Guidelines) and is publicly available on the Group’s website.

In the area of **human rights**, the Code rejects all forms of exploitation, discrimination, or favouritism and promotes workers’ participation, the ability to report violations through whistleblowing, health and safety protection, and the prevention of

discrimination based on age, gender, race, sexual orientation, gender identity, disability, religion, political opinion, or social or national origin.

- **DE&I Committee:** oversees Diversity, Equity & Inclusion policies, fostering a respectful, inclusive and merit-based work environment. Operating under formal regulations, the Committee collects and manages reports and organizes awareness and discussion activities. The policy covers all dimensions of diversity—internal, external and organizational.
- **Organizational Model 231:** applied throughout the company to prevent offences and ensure legality, it includes operational protocols, risk areas, control measures and audit activities. The independent supervisory committee monitors its implementation and effectiveness. The Special Section “Health, Safety & Environment” covers operational protocols and dedicated worker safety training, in line with Article 25-septies of Legislative Decree 231/2001.
- **Sustainability Policy:** includes references to the Group’s own workforce, promoting health, well-being, inclusion, internal training and the dissemination of sustainability culture.
- **Health and safety in the workplace:** protects employees’ physical and psychological well-being, promotes accident prevention and responsible behaviour, and aligns with Italian and EU legislation (Legislative Decree 81/08, Directive 89/391/EEC) and ISO 45001 principles.
- **Supplier Code of Conduct:** establishes clear requirements across the supply chain concerning respect for human rights, decent working conditions, prohibition of child or forced labour, health and safety protection, responsible environmental management, anti-discrimination measures, and ethical and transparent conduct in relations with suppliers and partners. Since the Code was co-developed, Sammontana also commits to applying its standards internally to its own workforce. The Code draws inspiration from international frameworks such as the **UN Guiding Principles on Business and Human Rights (UNGPs)**, **ILO Core Conventions**, the **UN Global Compact**, and the **Sustainable Development Goals (SDGs)**.

The policies described form the foundation for the Group’s engagement, the principle of listening to one another, and continuous improvement processes outlined in the following sections.

S1-2 – Processes for engaging with own workforce and workers’ representatives about impacts

Sammontana promotes the active engagement of its workforce through structured and ongoing practices designed to foster listening to one another, participation, and awareness of rights, working conditions, and corporate values.

Engagement takes place directly among employees, complemented by interactions with union representatives and is structured across various stages of the professional journey:

- **At hiring:** introductory training on fundamental principles, behavioural standards, and workers' rights;
- **Periodic training:** annual updates on health and safety, corporate values, and internal policies;
- **Job changes:** targeted training to ensure skill alignment and proper management of new risks.

Operational responsibility for these activities is shared among the **Sustainability, Human Resources**, and **Health & Safety** functions.

The **Supplier Code of Conduct** serves as the main reference for human rights protection. Since it was co-developed with internal and external stakeholders, the Group also treats it as an internal standard, setting clear obligations regarding human dignity and fundamental rights, prohibition of forced or inhumane labour, freedom of association, and transparency in contractual and working conditions.

To support the most vulnerable categories of workers – including persons with disabilities, women survivors of violence, and migrants – Sammontana collaborates with local organizations to facilitate the employment of people at risk of social marginalization.

S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns

Sammontana recognises the importance of responsibly addressing potential negative impacts on its own workforce, in alignment with the principles of the UN 2030 Agenda, the European Green Deal, and the Farm to Fork Strategy.

Sammontana has implemented structured processes for the management and mitigation of material issues, supported by ongoing monitoring of action effectiveness and continuous updates to protection mechanisms.

Reporting Channels and Worker Safeguards

- Since 2023, Sammontana has operated a Whistleblowing Platform, managed by an independent third party, enabling employees to confidentially report non-compliant behaviour, organisational concerns, or breaches of the Code of Ethics.
- All reports are handled in accordance with applicable legislation (Legislative Decree 24/2023), ensuring confidentiality, data protection, and protection against retaliation.
- In addition to whistleblowing, Sammontana provides internal mechanisms for dialogue and feedback, including the corporate intranet, periodic organisational climate surveys, and structured feedback interviews introduced through a partnership with Progrexus, a provider of business and human resources consulting expertise, and Unobravo, an online mental health service provider.
- Reports are managed through a formalized process of registration, analysis, and, following review, closure. Annual reports are made to the Supervisory Body and the HR Department.

In 2024, no reports were received through official channels. Insights gathered through the Group's collaboration with Progexus and Unobravo are detailed in the 2024 Sammontana SB Impact Report.

For 2025, the Group plans to implement a harmonized reporting and protection system.

S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Sammontana proactively manages workforce-related impacts, risks, and opportunities through integrated initiatives in corporate welfare, occupational health and safety, training, inclusion, and organisational development.

Well-being and socio-economic support

The Group promotes a corporate well-being model that integrates economic protection, psychological support, work-life balance, and personal development, in alignment with B Corp principles and Sustainable Development Goals (SDGs) 3 and 8 of the 2030 Agenda.

The corporate welfare system is designed as a strategic lever for internal sustainability and employee retention, and is monitored through indicators of participation, satisfaction, and perceived well-being.

- **Welfare Tools and Socio-Economic Support**

The corporate welfare plan includes a structured set of tools:

- 1) *Cassa Vita*, *Alifond*, and *Fondo FASA*, which provide pension, healthcare, and income support benefits;
- 2) One additional day of parental leave to promote shared parenting;
- 3) Discounts on company products and access to internal canteen services or meal vouchers where canteen facilities are unavailable or insufficient;
- 4) Company cars for business travel, supporting safe and sustainable mobility.

In 2025, a preliminary analysis will be conducted to harmonize initiatives at an international level, along with the launch of a Home-to-Work Travel Plan for the San Giuliano Milanese and Jesolo sites, following the prior implementation of this model at the Empoli, Vinci, and Colognola sites.

- **Mental Health and Psychological Well-being Support**

In 2024, the collaboration with the Unobravo platform continued, offering individual and group online psychological support services, including workshops on stress management, work-life balance, and on managing professional relationships.

The initiative was monitored through participation rates and qualitative feedback collected via internal surveys, and it represents a stable component of the Group's HR policy. The offering will be extended to other Group locations in Italy in 2025.

- **Smart working and Work-Life Balance**

Structured smart working, introduced in 2023, remains a key tool to promote flexibility, reduce commuting, and improve quality of life.

In 2024, the level of implementation differed between Sammontana and Forno d'Asolo. Therefore, in 2025, a Group-wide harmonization will be carried out, with the definition of common guidelines relating to smart working and monitoring systems based on HR KPIs and satisfaction surveys.

- **Internal Communication and Employee Engagement**

The corporate intranet platform enables centralized operational, training, and informational communication, facilitates reporting, promotes welfare initiatives, and encourages cross-functional dialogue.

In 2024, the goal of reaching all Sammontana employees was substantially achieved. In 2025, the platform will be extended to the new Group perimeter, integrating additional features to enhance employee engagement and continuous listening.

Occupational Health and Safety

Protecting the health and safety of workers is a strategic priority for Sammontana. The Group adopts a systemic approach based on prevention, monitoring, and continuous improvement of working conditions across all production sites.

- **Technological and Plant Upgrades**

- In 2024, new installations – specifically Line E in Vinci and Line 10 in Colognola ai Colli – were designed and built with the integration of advanced detection and safety systems. At the Empoli site, new tanks for ice cream mixing were installed and enhance safety and operational reliability.
- The ergonomic and safety improvement project for Manual Material Handling (MMC) continued in 2024, with targeted actions including:
 - 1) Installation of a conveyor and structure for finished product storage and retrieval on Line A;
 - 2) Scrap recovery interventions on Lines B and C in the pastry department in Verona;
 - 3) Scrap recovery on Line D at the Vinci plant.

In 2024, a periodic analysis of accidents, incidents, and near misses was conducted at the Empoli, Vinci, and Colognola ai Colli sites, with an extension planned for the Maser site in 2025. Monitoring activities, carried out in collaboration with HSE and Plant functions, enable timely identification of risk areas and guide improvement actions.

- **Training and Skills Development**

Maintenance staff receive training upon hiring, based on the corporate training plan, and periodic updates are provided for existing personnel, in compliance with the State-Regions Agreement. Continuous training also follows the BRCGS (Brand Reputation through Compliance Global Standards) framework, alongside regular updates on risk assessments, ensuring that all employees operate in accordance with the highest international standards for food and industrial safety.

Diversity, Equity and Inclusion (DEI)

In 2024, Sammontana launched a structured awareness program on diversity, equity, and inclusion, aimed at fostering a welcoming, fair, and respectful work environment.

Inspired by B Corp values and Human Rights principles, the program included interactive training modules and practical tools for all organizational levels, with the goal of increasing awareness and promoting inclusive behaviors.

In 2025, Sammontana aims to extend the integration of DEI principles across all HR processes, internal communication, and managerial practices, incorporating equity and equal opportunity criteria into recruitment, development, career advancement, and performance evaluation. This initiative is part of a broader cultural alignment plan for the new Group, aimed at harmonizing practices and values across all sites and functions, with full organizational implementation expected by 2026.

Continuous learning and training

Training is a strategic tool for professional growth and for promoting a culture of safety, sustainability, and corporate ethics. In 2024, the Group's integrated training plan was finalized, including courses on health and safety, sustainability, DEI, human rights, and contractual welfare, with the aim of enhancing both technical and soft skills.

Operational training for new hires is provided through dedicated sessions and annual refresher programs. Maintenance staff receive specific training in accordance with the State-Regions Agreement and the BRCGS standard. Regular updates on risk assessments are also scheduled to maintain high safety standards and compliance with international regulations.

In parallel, the partnership with *Progrexus* continues, supporting management profiling and the dissemination of collaborative leadership models and advanced feedback systems. This initiative is a key component of the organizational development plan and serves as a foundation for aligning corporate cultures within the new "one company" structure.

Organisational dialogue and internal climate

Sammontana fosters a culture of open dialogue and continuous improvement, based on active listening and employee engagement. Biennial organizational climate surveys are conducted at the Empoli, Vinci, and Colognola ai Colli sites, while an annual follow-up survey monitors motivation, sense of belonging, and perceived well-being.

Starting in 2024, the traditional feedback system has evolved into a structured model of dialogue between managers and teams, aimed at promoting transparency, mutual trust, and continuous improvement in professional relationships. This initiative, integrated with insights from *Progrexus* analysis, is a key driver for strengthening organizational culture and building a shared identity across the Group.

In 2025, additional survey elements will be introduced, converging into a new *Great Place to Work* plan starting 2026, which is in line with the strategic objectives outlined in the following section.

S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Sammontana has defined five strategic, measurable, and progressive objectives to enhance employee well-being, engagement, and professional growth, in line with its commitments as a Benefit Corporation and with ESG principles.

These objectives, structured over a three-year horizon, aim to strengthen corporate culture, support organizational evolution, and promote a safe, fair, and motivating work environment.

1. Training and Organisational Culture

In 2024, four training modules focused on purpose, values, and sustainability were delivered, engaging over 80% of the workforce.

Starting in 2025, each employee will have access to five annual days dedicated to personal and professional development, including through digital platforms, to foster continuous and widespread learning.

With the formation of the new Group, training programs will be recalibrated to reflect the new organizational structure, ensuring consistency and alignment across all entities within the “one company”.

The training journey will also be enriched with modules on inclusive leadership, change management, and safety culture.

2. Dialogue and Feedback

In 2025, a 360° evaluation system for management that is currently under development will be introduced, aimed at strengthening collaborative leadership and mutual trust within teams. In parallel, the extension of the corporate intranet to the entire Group will support integrated communication, transparency, and participation, becoming a unified channel for information exchange and employee engagement.

These initiatives will contribute to the consolidation of a continuous feedback culture, aligned with the dialogue model already initiated through the Progexus partnership.

3. Inclusion and Gender Equality

Sammontana continues its commitment to fostering a fair and inclusive workplace, with the goal of increasing the representation of individuals from vulnerable groups, such as people with disabilities or survivors of violence.

In 2026, a gap analysis will be launched in preparation for obtaining a UNI PdR 125:2022 gender equality certification. The gap analysis is expected to be completed by 2027.

Progress will be monitored through DEI KPIs and gender equality indicators, integrated into the HR reporting system.

The reorganization of the Group following the acquisition of the Forno d’Asolo has temporarily delayed the operational start of the project, which remains a strategic priority for building an inclusive and internationally coherent culture.

4. Well-being and Engagement

In 2025, the organizational well-being survey (climate analysis) will be revised to reflect the new corporate structure and the needs emerging from recent integration processes.

The corporate volunteering program, strongly supported by the recognition of Sammontana SB as a Benefit Corporation to reinforce employee social engagement and connection with local communities, has been postponed until after the Group consolidation is completed.

This initiative will contribute to promoting a culture of participation and active citizenship, in line with the Benefit mission and SDGs 3, 8, and 11 of the 2030 Agenda.

5. Continuous Improvement

Between 2025 and 2027, Sammontana will launch a feasibility assessment for obtaining a *Great Place to Work* certification, which involves analyzing HR practices and employee listening and engagement systems.

The goal is to foster a workplace culture based on trust, collaboration, and recognition, supporting both personal and organizational growth.

The consolidation of feedback and internal dialogue practices forms the foundation for a continuous improvement process, aimed at strengthening cultural cohesion, transparency, and the Group's capacity for social innovation.

S1-6 – Characteristics of the undertaking's employees

Presented below are the figures related to the main characteristics of the Group's workforce, with quantitative data expressed in **full-time equivalents (FTEs)**, broken down by gender, contract type, and country. It also includes information on the turnover rate and the data collection methodology.

Data were collected using a shared table distributed via email to the Personnel Administration and Human Resources departments of each production site.

The **FTE** is a standardized unit that allows comparison among different contract types, even when employees work a varying number of weekly hours. In this report, 1 FTE equals **2,080 working hours per year**, based on a 40-hour working week over 52 weeks. This enables the aggregation of full-time, part-time, seasonal, and agency workers into a single comparable metric.

At the end of 2024, Sammontana employed a total of **2,093 FTEs**, with over 85% of staff based in Italy and the remainder distributed between France and the United States.

| Employees by gender | UoM | 2024 |
|---------------------|------------|--------------|
| Man | FTE | 1,425.27 |
| Woman | FTE | 667.72 |
| Total | FTE | 2,093 |

Table 16. Employees by gender

| Employees by country | UoM | 2024 |
|----------------------|-----|----------|
| Italy | FTE | 1,820.60 |
| France | FTE | 94.44 |
| USA | FTE | 178 |

| | | |
|-------|-----|-------|
| Total | FTE | 2,093 |
|-------|-----|-------|

Table 17. Employees by country

| Employees by contract type | UoM | 2024 | |
|----------------------------|------------|--------------|------------|
| | | Man | Woman |
| Permanent contract | FTE | 1,374 | 627 |
| Fixed-term contract | FTE | 51 | 41 |
| Total | FTE | 1,425 | 668 |

Table 18. Employees by contract type

| | UoM | 2024 |
|---------------------|-----|------|
| Part-time employees | FTE | 123 |
| Seasonal employees | FTE | 346 |
| Agency workers | FTE | 404 |

Table 19. Employees by employment type

The **turnover rate** was calculated as the ratio between the number of **voluntary resignations of permanent employees** (expressed in FTE) during the year and the total number of permanent employees (expressed in FTE) at year-end, multiplied by 100. The resulting figure, **6.65%**, reflects the level of voluntary staff rotation among permanent employees within the organization.

S1-8 – Collective bargaining coverage and social dialogue

Detailed below is information concerning the coverage of workers by collective bargaining agreements and the percentage of employees represented by workers' representative bodies within Sammontana. The figures in the tables below refer exclusively to employees operating within the European Economic Area (EEA).

| Employees covered by collective bargaining agreements | UoM | 2024 |
|---|----------|--------------|
| Number of employees covered by collective bargaining agreements | FTE | 1,908 |
| Total number of employees | FTE | 1,915 |
| Coverage rate | % | 99.6% |

Table 20. percentage of employees covered by collective bargaining agreements

| Employees represented by workers' representatives | UoM | 2024 |
|---|----------|-------------|
| Number of employees working in sites with workers' representation | FTE | 1,915 |
| Total number of employees | FTE | 1,915 |
| Coverage rate | % | 100% |

Table 21. Percentage of employees represented by workers' representatives

S1-9 – Diversity metrics

The tables that follow illustrate the composition of the Board of Directors and the distribution of the workforce by age group.

| Composition of the Board of Directors | UoM | 2024 |
|---------------------------------------|------------|-----------|
| Men | FTE | 18 |
| | % | 75% |
| Women | FTE | 6 |
| | % | 25% |
| Total | ETP | 24 |

Table 22. Composition of the Board of Directors

| Number of employees by age group | UoM | 2024 |
|----------------------------------|-----|------|
|----------------------------------|-----|------|

| | | |
|-------|-----|-------|
| <30 | FTE | 229 |
| | % | 11% |
| 30-50 | FTE | 948 |
| | % | 45% |
| >50 | FTE | 916 |
| | % | 44% |
| Total | FTE | 2,093 |

Table 23. Number of employees by age group

S1-10 – Adequate wages

All Sammontana employees receive remuneration compliant with and appropriate under the applicable national collective bargaining agreements. Likewise, non-employee personnel are compensated in accordance with the applicable reference agreements at the Group sites where they work. This approach reflects the Group's commitment to maintaining a safe, fair, and legally compliant work environment, ensuring favourable conditions for professional development while fully respecting labour rights and protections.

S1-14 – Health and safety metrics

Protecting workers' health and safety is a top priority for the Group. We are committed to ensuring a safe workplace and fostering a culture of prevention at all organizational levels. The data below show employee coverage under the Group's health and safety management system, as well as the injury rate, cases of occupational disease, and lost days due to workplace accidents.

| Own workers covered by the health and safety management system | UoM | 2024 |
|--|------------------|--------|
| Total workers, including: | Number of people | |
| Employees | | 2,093 |
| Non-employees | | 389.54 |
| Workers covered by the company's health and safety management system, including: | | |
| Employees | 2,093 | |
| Non-employees | - | |
| % of workers covered by the health and safety system: | % | |
| Employees | | 100% |
| Non-employees | - | |

Table 24. Workers covered by the health and safety management system

In accordance with ESRS S1-14, Sammontana calculates the work-related injury rate by dividing the number of recorded cases by the total number of hours worked by the whole workforce, multiplied by 1,000,000. In addition to the data presented below regarding the injury rate, it is worth noting that only one case of occupational disease was recorded during the reporting period.

| Employees injuries | 2024 |
|--|-----------|
| Number of cases | 82 |
| Total number of hours worked by own workers | 3,345,948 |
| Work-related injury rate (based on 1,000,000 hours worked) | 25 |

Table 25. Number and rate of recordable work-related injuries

In addition to the work-related injury rate, one case of minor occupational disease related to work activities was recorded during the 2024 financial year.

| Lost days | 2024 |
|--|-------|
| Number of days lost due to work-related injuries and fatalities resulting from accidents | 2,036 |

Table 26. Number of lost days due to work-related accidents

S1-16 – Remuneration metrics (pay gap and total remuneration)

The data below shows the gender pay gap by employee category and the ratio between the total annual remuneration of the highest-paid individual and the median remuneration of all other employees (excluding the highest-paid). Following the acquisition of Forno d’Asolo Group on 30 July 2024, gender pay gap and remuneration comparison figures for the reporting year are disclosed separately by company.

| Company | Remuneration | UoM | Man | Woman |
|--------------------------------------|--|-----|--------|-------|
| SIPA | Overall average gross hourly wage, of which for: | € | 16.33 | 14.43 |
| | Executives | € | 48.83 | - |
| | Managers | € | 31.41 | 35.42 |
| | White-collar employees | € | 18.25 | 16.12 |
| | Blue-collar employees | € | 13.71 | 12.50 |
| Forno d’Asolo SpA | Overall average gross hourly wage, of which for: | € | 17.51 | 13.82 |
| | Executives | € | 101.87 | - |
| | Managers | € | 37.88 | 34.03 |
| | White-collar employees | € | 22.87 | 17.68 |
| | Blue-collar employees | € | 16.31 | 15.53 |
| Sammontana Soc. Benefit ² | Overall average gross hourly wage, of which for: | € | 18.49 | 15.25 |
| | Executives | € | 50.18 | 61.49 |
| | Managers | € | 29.22 | 31.54 |
| | White-collar employees | € | 18.34 | 14.57 |
| | Blue-collar employees | € | 14.91 | 13.89 |
| Transfrigo | Overall average gross hourly wage, of which for: | € | 15.83 | - |
| | Blue-collar employees | € | 15.83 | - |
| Gelpat | Overall average gross hourly wage, of which for: | € | 14.40 | 12.74 |
| | Executives | € | 38.55 | 19.88 |
| | Managers | € | - | - |
| | White-collar employees | € | 15.52 | 14.98 |
| | Blue-collar employees | € | 12.00 | 12.09 |
| Bindi North America, Inc. | Overall average gross hourly wage, of which for: | € | 28.60 | 24.43 |
| | Executives | € | 91.83 | 50.03 |
| | Managers | € | 45.76 | 41.28 |
| | White-collar employees | € | 52.56 | 35.03 |
| | Blue-collar employees | € | 21.42 | 16.26 |

Table 27. Gender pay gap

| Company | Remuneration | UoM | 2024 |
|---------------------------|--|-----|------------|
| Bindi SGM | Total annual remuneration of the highest-paid employee | € | 222,448.7 |
| | Median total annual remuneration of all employees | | 39,344 |
| Maser & Jesolo | Total annual remuneration of the highest-paid employee | € | 239,475.18 |
| | Median total annual remuneration of all employees | | 36,116.68 |
| Sammontana Soc. Benefit | Total annual remuneration of the highest-paid employee | € | 838,053 |
| | Median total annual remuneration of all employees | | 32,490 |
| Transfrigo | Total annual remuneration of the highest-paid employee | € | 50,734 |
| | Median total annual remuneration of all employees | | 30,928 |
| Gelpat | Total annual remuneration of the highest-paid employee | € | 163,140 |
| | Median total annual remuneration of all employees | | 26,842.42 |
| Bindi North America, Inc. | Total annual remuneration of the highest-paid employee | € | 429,236.67 |
| | Median total annual remuneration of all employees | | 56,630.28 |

² Plants in Empoli, Cognola and Vinci.

Table 28. Ratio between total annual remuneration of the highest-paid individual and the median total annual remuneration of all employees (excluding the highest-paid individual)

WORKERS IN THE VALUE CHAIN

SBM-2 – Interests and views of stakeholders

Sammontana recognizes that workers in its value chain constitute a key stakeholder group, potentially subject to significant impacts stemming from corporate activities, particularly in relation to human rights and working conditions. For a detailed analysis of how the interests, views and rights of the Group’s value chain workers may inform the strategy and business model, please refer to the chapter “General Information,” section “SBM-2 – Interests and views of stakeholders.” For further details on engagement across the value chain, see the section “S2-2 – Processes for engaging with value chain workers about impacts” in this chapter.

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

| Material IROs identified under S2 – Value chain workers |
|---|
| Impacts |
| Employment insecurity (up-down) – POTENTIAL |
| Lack of wage adjustment (up-down) – POTENTIAL |
| Working time violations (up-down) – POTENTIAL |
| Restrictions on workers’ freedom of association across the value chain (up) – POTENTIAL |
| Breaches of contractual conditions (up-down) – POTENTIAL |
| Adverse health and safety outcomes in production processes (up-down) – POTENTIAL |
| Incidents of discrimination (up-down) – POTENTIAL |
| Human rights violations (up) – POTENTIAL |
| Risks |
| Risk of production stoppages due to strikes at third-party companies (up) |

Table 29. Material impacts, risks and opportunities under the topic “Value chain workers” (S2)

The double materiality assessment identified significant potential negative impacts related to working conditions and other workers’ rights. Currently, Sammontana does not have a structured human rights due diligence system that covers workers across its value chain, which limits its ability to prevent and mitigate systemic violations such as restrictions on freedom of association, the use of labour without regular contracts, and precarious working conditions. These issues are particularly relevant in the agricultural and manufacturing sectors, where fixed-term contracts lack adequate protective clauses, thus exposing migrant workers to employment and financial insecurity.

Additional negative impacts include inadequate wages, non-compliance with contractual conditions, and potential breaches of working time regulations, with consequences for physical and mental health. In certain non-EU countries—such as Brazil, Côte d'Ivoire, Indonesia, Guatemala, Colombia, Malaysia, and China—restrictions on freedom of association and barriers to forming trade unions or workers' committees have been observed. There are also risks of discrimination based on gender, ethnicity, religion, or sexual orientation, as well as severe human rights violations, including child labour and forced labour, especially within the value chains of raw materials such as cocoa, coffee, palm oil, and pulp.

From a financial and operational perspective, these issues pose risks of legal sanctions, reputational damage, and potential production disruptions (e.g., strikes among external personnel providing essential services).

To address these risks, Sammontana plans to strengthen governance and oversight across the supply chain by adopting effective due diligence tools and fostering a corporate culture rooted in respect for human rights, social responsibility and equality. The identified **IROs** primarily concern upstream and downstream activities in high-risk sectors and geographies.

In 2023, Sammontana co-developed a **Supplier Code of Conduct** together with its key suppliers, defining mandatory and progressive practices to be implemented through supply chain projects. In 2024, the Group shared supplier performance rankings based on the Code-related questionnaires and organized a workshop to generate shared improvement initiatives. Further details are available in the **Impact Report of Sammontana S.p.A. Società Benefit**.

S2-1 – Policies related to value chain workers

Sammontana adopts a comprehensive set of policies and regulatory instruments to ensure respect for human rights, promote decent work, and uphold social sustainability throughout the value chain. These policies are based on principles of shared responsibility, transparency and continuous improvement. They are primarily formalized in the Supplier Code of Conduct, complemented by additional corporate documents such as the Anti-Corruption Code and internal policies on human rights, inclusion, and health and safety.

The **Supplier Code of Conduct**, applicable to all business partners, is the cornerstone for managing social impacts in the supply chain. It sets out minimum mandatory requirements and progressive practices across four impact areas: governance, people, planet, and customers. Commitments toward people include prohibiting forced labour, human trafficking, and child labour; promoting freedom of association; ensuring fair contractual conditions; protecting health and safety at work; and fostering diversity and inclusion. The Code's principles align with international standards such as the UN Guiding Principles on Business and Human Rights, OECD Guidelines, ILO Core Conventions, and the Ten Principles of the UN Global Compact.

The Code was developed through active engagement with a sample of suppliers, following a co-creation and stakeholder-listening approach. Sammontana promotes its dissemination by publishing the Code on its website and requiring suppliers to cascade it throughout their own supply chains. Compliance is monitored through audits, inspections, and periodic

assessments managed by the Sustainability Team, with a dedicated focal point. Where non-compliance is identified, improvement plans and corrective actions may be activated.

The **Anti-Corruption Code**, approved by the Board of Directors and signed by the CEO, reinforces ethical safeguards along the supply chain, promoting legality and preventing unlawful conduct, including through a whistleblowing system compliant with EU regulations. While not directly focused on value chain workers, the Code helps mitigate reputational and legal risks arising from improper practices with suppliers and third parties. Further, the Code applies across the entire value chain without territorial or sectoral limitations. Stakeholder groups involved include suppliers, workers, local communities, customers and institutions.

The **GELPAT Company Policy** introduces structured supplier requirements to ensure human rights, decent working conditions, health and safety, environmental management and ethical integrity. Adherence entails periodic audits, self-assessments, continuous training for suppliers and internal staff, and ongoing monitoring and transparent communication.

Accountability for implementation of these policies lies at the managerial level and extends across the value chain, including sub-suppliers, with no geographical limitations. The model is inspired by recognized international references such as the UN Guiding Principles, ILO Core Conventions, the UN Global Compact, the SDGs and the OECD Guidelines.

Core elements of the model include structured worker-management dialogue, consultation, training, and anonymous reporting and remediation mechanisms. Particular attention is devoted to temporary workers, apprentices and young workers, with a zero-tolerance stance on child and forced labour.

The Group's approach is based on openness, cooperation and supplier empowerment, requiring suppliers to communicate rights and duties clearly to their workers and thereby contributing to a fairer, safer and more sustainable supply chain.

Sammontana explicitly commits to combating any form of labour exploitation and to promoting fair and safe working conditions across the entire value chain. Although no specific cases of human rights violations have been reported, the Group has established anonymous reporting mechanisms and whistleblower protections in line with the EU Whistleblowing Directive.

In summary, Sammontana pursues an integrated, proactive approach to managing social risks along the supply chain—grounded in international standards, stakeholder engagement, transparency and accountability—with the aim of generating shared value and promoting an ethical and sustainable value chain.

S2-2 – Processes for engaging with value chain workers about impacts

The Group adopts a structured and participatory approach to ensure the active engagement of workers along the value chain, with the goal of integrating their perspectives into decision-making processes related to the management of social impacts. Engagement occurs primarily through direct interactions with qualified representatives of suppliers, selected on the basis of their economic relevance and representativeness within the chain.

As described in the [2024 Impact Report of Sammontana S.p.A. Società Benefit](#), in 2024 the company hosted a sustainability-focused workshop involving a heterogeneous group of professionals from suppliers' various corporate functions, including CEOs, general managers, and heads of quality, sustainability, R&D, sales, safety, procurement and legal. This approach enabled cross-functional, multidisciplinary interaction that reflected the diverse perspectives of workers across the value chain.

The engagement process unfolds in several phases. It begins with an analysis of relevant sustainability areas, followed by the development of a [thematic questionnaire with a rating system](#). Selected suppliers—representing at least 80% of purchase value—receive the questionnaire, and responses are mapped to identify clusters with similar needs. A subset of suppliers is then invited to a co-design workshop, conceived as an open, non-competitive, and non-hierarchical space that encourages the exchange of good practices and the sharing of experiences among organizations at different levels of sustainability maturity.

Operational responsibility lies with the Sustainability Function, which ensures methodological consistency, quality of dialogue, and integration of outcomes into corporate processes. Although Sammontana currently has no Global Framework Agreements with international trade union federations, the company recognizes the right to collective bargaining and promotes social dialogue through suppliers, in line with ILO and UN principles. Engagement effectiveness is assessed by observing dynamics during workshops, with particular attention to fostering mutual learning, inspiration, and collaboration. The informal, peer-level setting has encouraged active participation by less structured organizations, which benefited from learning opportunities offered by more mature suppliers.

Finally, Sammontana is committed to understanding the perspectives of the most vulnerable or marginalized workers—such as women, migrants or persons with disabilities—through questionnaire analysis, supplier segmentation and direct dialogue. This approach enables the identification of priority areas and the promotion of targeted actions to strengthen equity and inclusion throughout the value chain.

S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns

For information on the channels available to value chain workers to raise concerns, please refer to chapter G1-1 – Business conduct policies and corporate culture.

S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action

The Group has implemented a comprehensive set of actions to prevent, mitigate and remediate actual and potential impacts on workers in its value chain, with the aim of strengthening social sustainability across the entire supply chain. These actions form part of a broader strategic framework aimed at promoting responsible, inclusive and transparent practices consistent with corporate objectives regarding human rights, decent work and sustainable development.

Actions taken

A key initiative focuses on developing a responsible supply chain management system. This includes cascading the **Supplier Code of Conduct** to strategic partners—covering at least 80% of purchasing spend—and introducing a **self-assessment questionnaire** that integrates environmental, social, and governance criteria. The dual objective is to measure suppliers' alignment with the Code's principles and categorize them by ESG maturity, enabling targeted engagement and the exchange of best practices. Expected outcomes include greater awareness across the supply chain, identification of improvement areas, and activation of continuous improvement processes.

In September 2024, Sammontana hosted an **in-person workshop at the company venue “La Fornace” in Tuscany**, involving a selected group of suppliers identified through ESG questionnaire results. The event was structured around thematic tables covering environmental, social and governance topics, fostering direct dialogue, the sharing of good practices and co-design of solutions. As reported in the **2024 Benefit Company Impact Report**, this initiative will be repeated annually as a participatory engagement model aimed at improving ESG performance.

As outlined in the environmental chapter, Sammontana has extended **ISCC PLUS certification** to the almond supply chain and to 99% of wheat purchased in 2024, incorporating requirements on water resources, emissions, biodiversity, circularity and fair remuneration. The company is also selecting **high-performing European milk suppliers** with the goal of establishing strategic partnerships, reinforcing its commitment to fully responsible and traceable sourcing across the entire value chain.

The **“Lidi Green”** project, developed in collaboration with the Sant'Anna School of Advanced Studies (Pisa), assessed environmental and social management practices at selected partner points of sale located on major Italian beaches. These partners offer carbon-compensated ice creams, raising consumer awareness and promoting sustainable practices across commercial channels.

On health and safety, Sammontana implements specific measures to protect the workers of external companies operating at its sites. These include compliance with company regulations, verification of mandatory qualifications and training, and controls over access procedures. Practical examples include the installation of ventilation systems in the workshop at the Empoli plant and the adoption of safety devices for access to wastewater treatment tanks at the Colognola, Empoli and Vinci sites. Formalized in corporate procedures, these actions aim to ensure safe working conditions in accordance with regulatory standards, safeguarding the employees of external companies.

Planned actions

To complement this pathway, at the end of 2024 Sammontana launched a **revision of the Supplier Code of Conduct** to strengthen ethical, environmental, social and governance requirements across the supply chain. The new Code, currently under development, will include clear obligations on workers' rights, health and safety, environmental protection, ethics and regulatory compliance, together with monitoring, self-assessment and audit mechanisms. The initiative aims to reinforce supplier due diligence, increase transparency and reduce ESG

risks, contributing to corporate objectives on human rights, circular economy, climate and accountability.

S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Within its sustainability strategy, Sammontana has defined a set of **voluntary targets**, consistent with company policies, to strengthen the social dimension along the value chain. These targets serve as operational tools for the concrete implementation of commitments on **human rights, responsible sourcing, stakeholder inclusion** and continuous improvement of suppliers' social performance.

Stakeholder engagement

A priority target concerns strengthening **stakeholder engagement** within materiality analysis through questionnaires, workshops and structured dialogue. The initiative is part of social dialogue and transparency policies and is aligned with the ESRS. Monitoring is carried out via semi-annual reporting and digital engagement platforms, with traceability by stakeholder category.

Certified raw materials

A second target aims to **maintain or increase** the share of raw materials procured with internationally recognized sustainability certifications. Closely linked to responsible sourcing policies, this target has a direct impact on working conditions in agricultural supply chains. The scope covers the entire upstream supply chain—domestic and international—with a focus on food raw materials and key ingredients. Monitoring is conducted annually through internal and external audits, with data validated by certification bodies.

Strategic partnerships

In line with the evolution of the supply chain, Sammontana has set a target to activate **new strategic partnerships** with selected business partners to develop joint projects that improve environmental and social conditions along the value chain. The initiative covers suppliers of raw materials, packaging, logistics and services, and is formalized through agreements evaluated on effectiveness, replicability and impact, in line with **SDGs 12 and 17**, the **European Green Deal**, and the **Corporate Sustainability Due Diligence** directive framework.

Wheat supply chain

For the wheat supply chain, the Group intends to **maintain or increase** the number of pastry references produced by **ISCC PLUS-certified co-packers**. This target reinforces Sammontana's commitment to traceability and social responsibility in production chains, ensuring high standards are met by third-party partners as well. Monitoring takes place through the collection of up-to-date certificates, periodic audits and internal indicators, consistent with **SDGs 12 and 13** and the national circular economy strategy.

Monitoring and review

All targets are monitored by the Sustainability Function, in collaboration with Procurement, Quality and Legal, and are subject to periodic reviews based on regulatory developments, international standards and supply chain dynamics. Stakeholder involvement in target setting and implementation takes place through workshops, consultations and technical-scientific partnerships, ensuring alignment with the broader **sustainable** development context. All results are reported in the Impact Report, compiled by the Impact Manager.

AFFECTED COMMUNITIES

SBM-2 – Interests and views of stakeholders

Sammontana recognizes that local communities represent a key group of stakeholders, potentially subject to significant impacts resulting from the Group’s activities. For a detailed overview of how the interests, views and rights of the Group’s local communities may influence the business strategy and model, please refer to the Chapter “General Information,” section “SBM-2 – Interests and views of stakeholders.” For further information on stakeholder engagement, see paragraph “S3-2 – Processes for engaging with affected communities about impacts” in this Chapter.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

| Material IROs identified under S3 – Affected communities |
|--|
| Impacts |
| Job creation in local communities (core) – ACTUAL |
| Relationship and dialogue with local communities (core) – ACTUAL |
| Use of natural resources (up) – POTENTIAL |
| Impact on the health of local communities due to soil pollution from production sites (up) – POTENTIAL |
| Opportunities |
| Reputational improvement through food donations (core) |

Table 30. Material impacts, risks and opportunities under the topic “Affected communities” (S3)

The double materiality assessment conducted by the Group on topic S3 – Affected communities - identified a range of significant positive and negative impacts related to the economic, social and cultural rights of local communities, as well as to the territorial dynamics in which the organization operates directly or indirectly through its value chain.

Among the actual positive impacts, the Group contributes directly to the socioeconomic development of local areas through job creation within local communities and the voluntary preference for local suppliers and businesses. This approach strengthens the local economic fabric and promotes community resilience. The Group also fosters dialogue and active engagement with local communities, as demonstrated by participation in educational and training initiatives, including the “**B Corp School**” project in collaboration with **InVento**

Innovation Lab. These initiatives – which also cover topics such as diversity & inclusion and gender-based violence prevention – consolidate territorial ties and spread a culture of sustainability, as described in the Impact Report.

The analysis also identified potential negative impacts, mainly in the upstream segment of the value chain. These include risks associated with the exploitation of natural resources by suppliers, which may compromise resource availability for local communities and lead to inefficiencies in distribution, with adverse effects on both people and the environment. A potential negative impact on community health was also identified, linked to soil pollution from suppliers' production sites, with significant implications for safety and well-being.

Finally, the assessment highlighted a relevant opportunity related to the donation of non-compliant but still edible food products to third-sector organizations, such as Banco Alimentare, through the **Regusto** platform, as described in the Impact Report. This practice reduces food waste and enhances the Group's reputation, strengthening positive community perceptions and contributing to short-term social well-being.

S3-1 – Policies related to affected communities

At Group level, Sammontana currently does not have a formally structured policy specifically aimed at systematically managing material impacts and opportunities related to affected communities along the value chain. However, the Group has defined a set of general principles of conduct, outlined in its Code of Ethics, which serves as the official document establishing the Group's core values and behavioural guidelines in relations with all stakeholders, including local communities. The Code is publicly available. Although it is not a dedicated policy for managing community impacts, the Code provides a solid ethical foundation on which the Group intends to build, in the medium term, more structured and operational tools to strengthen its contribution to the sustainable development of the territories in which it operates.

S3-2 – Processes for engaging with affected communities about impacts

Sammontana does not currently have a formalized policy specifically dedicated to managing material impacts and opportunities related to affected communities across the value chain. Community engagement takes place both directly and through legitimate representatives or qualified third parties – such as academic institutions, non-profit organizations and public authorities – with deep knowledge of the local context. Initiatives such as Lidi Green, developed in collaboration with the Sant'Anna School of Advanced Studies of Pisa, represent concrete examples of dialogue and co-design with local stakeholders, aimed at promoting sustainable practices in areas characterized by strong seasonal tourism. Sammontana also participates in projects with institutional and academic partners, including the Ministry for the Environment, the University of Padua and Legambiente. Results are monitored through specific indicators and formalized in periodic reports.

Operational responsibility for stakeholder engagement, including with affected communities, lies with the Sustainability Function, which reports to the Board of Directors. This function ensures that the results of community dialogue are integrated into corporate strategy, in line with Sammontana SB's Benefit Corporation status and its ESG objectives.

The effectiveness of engagement activities is assessed through multiple tools, including monitoring institutional agreements, measuring the impact of local projects, and systematically collecting feedback from involved stakeholders. In addition, Sammontana's B Corp approach incorporates specific community impact assessments focused on equity, inclusion, and minority protection. This ensures that the perspectives of potentially vulnerable or marginalized groups—such as women, youth, and seasonal workers—are taken into consideration, contributing to fairer and more inclusive management of social impacts.

S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns

For information on the channels through which affected communities can raise concerns or report grievances, please refer to Chapter G1-1 – Business conduct policies and corporate culture.

S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

Sammontana adopts a systemic, multi-level approach to prevent, mitigate, and, where necessary, remediate actual and potential impacts on affected communities across its value chain. Actions undertaken include cultural, social, educational and environmental initiatives, aimed at generating positive impacts, strengthening territorial cohesion, and contributing to the sustainable development of the areas where the Group operates.

Actions taken

- “Smile Ambassador” Programme (Ambasciatori del Sorriso) – Launched in 2024 and currently being expanded, this initiative trains Ambassadors of Sustainability, Benefit and B Corp culture to promote ethical and sustainable business values through training sessions, workshops and awareness activities, both internally and externally. The initiative supports ESG and SDG objectives related to quality education, decent work, responsible consumption and partnerships. Effectiveness is monitored through quantitative KPIs (number of ambassadors, initiatives, engagement levels) and qualitative assessments.
- Donations Committee (since 2022) – Sammontana manages its third-sector commitments through a dedicated Donations Committee, supported by a specific budget and composed of representatives from the Sustainability Governance, Human Resources and Management. The Committee annually selects high-impact social projects aligned with company values. Partnerships with organizations such as **Dynamo Camp, Fondazione Meyer, Legambiente, AISM, ASTRO and ANT** generate tangible benefits in health, inclusion, education and environment. Effectiveness is verified through internal reporting and qualitative feedback.
- Structured food donation system with **Regusto** platform – Sammontana has established a structured system for donating unsellable but still edible finished products, reducing food waste and creating social value through redistribution to non-profit entities. Environmental and social impacts are measured in accordance with ISO 14040/44 standards, using algorithms developed with the University of Perugia, and

monitored through certified indicators (kilograms donated, equivalent meals, CO₂ avoided, water and soil saved), tracked via blockchain. The initiative contributes to SDGs 2 and 12, and complies with BRC and IFS food safety standards.

- **ICO HUB** founding member – In 2023, Sammontana supported youth innovation and entrepreneurship in the Empoli area, participating in the Technical Committee for selecting high-impact local projects. In parallel, with ARCO (PIN S.c.r.l.), the company carried out an in-depth analysis of the needs of the 15–29 age group, providing knowledge bases for targeted and replicable intervention strategies.
- **Impact Education Coalition** membership – Since December 2023, Sammontana has joined this multi-stakeholder network to enhance educational standards and measure the impact of joint initiatives among businesses, schools, institutions and civil society. In 2024, the company co-developed the S.T.E.P.S. Project (Territorial Synergies for the Empowerment of People and Society) in the Province of Verona, part of its Social Sustainability Strategy and the Impact Education Coalition framework, launched in partnership with InVento Innovation Lab. Funded by Fondazione Cariverona’s Sinergie Programme, the project focuses on combating gender-based violence among younger generations and will conclude in 2025.
- **Diversity & Inclusion Young** Project – Developed with InVento Innovation Lab, this initiative involves middle school students on gender equality and prevention of gender-based violence. Based on the pilot phase involving a Verona middle school, possible expansions will be assessed upon completion in 2025.
- **B Corp School** (Verona) – In late 2023, Sammontana engaged two classes from Istituto Copernico Pasoli in project challenges on sustainable packaging and milk supply chains. Successfully replicated in 2024, the initiative fosters creativity and environmental awareness among students, strengthening the link between business and education.
- Participation in public dialogue tables and industry associations, including Assobenefit, RSF, Unione Italiana Food, Confindustria, IICC, Euroglaces and Impact Education Coalition, reinforcing the Group’s capacity to contribute to collaborative and advocacy processes on national and international scales.

Cultural and territorial communication initiatives

- *The Island* (Pantelleria): An electronic music, nature and sustainability festival aimed at generating positive impacts for the island community and promoting direct contact with nature.
- *#Cistarebbeuncono* campaign: Relaunch of the Cono Cinque Stelle brand through participatory communication and free product distribution to Milan residents.
- *Lidi Green*: Active since 2018 and expanded in 2023 with Radio DeeJay, promotes sustainable beach management in Italy, selecting venues equipped with high-efficiency freezers and distributing carbon-compensated ice cream.

- *Legambiente's "Clean Beaches and Seabeds" campaign*: Supporting coastal clean-ups and raising environmental awareness among citizens.

These initiatives generate direct impacts on local communities, contributing to social cohesion, cultural promotion, and sustainability awareness. Their implementation is ongoing, monitored through qualitative and quantitative indicators, aligned with the Group's ESG and UN SDG objectives.

The geographical scope is primarily national, focusing on regions with long-standing operations (Tuscany, Veneto, Lombardy, Campania, Sicily) and involving both the Group's own and downstream communities – including citizens, institutions, schools, and cultural and environmental organizations.

Planned actions

In line with its Sustainability Strategy and its Benefit Corporation commitments, Sammontana has defined a set of planned initiatives aimed at strengthening its positive impact on affected communities. These focus on three priority areas: corporate culture and social responsibility, youth empowerment and inclusion, and gender equality. They are designed to prevent and mitigate potential negative impacts, seize local development opportunities, and foster an inclusive, transparent and purpose-driven corporate culture.

- **Strengthening the "Smile Ambassador" programme**

The first action involves the enhancement of the training programme launched in 2024, continuing with multi-level co-design activities. The goal is to spread B Corp values internally and externally, promoting a shared culture based on positive impact, transparency, responsible governance, and community engagement. Through ambassadors, Sammontana extends its sustainability policy to upstream and downstream stakeholders, including suppliers, customers, schools, and local partners. Effectiveness will be monitored through quantitative KPIs (number of ambassadors trained, initiatives activated, engagement rate) and qualitative assessments (focus groups, surveys). While the action does not include direct remediation measures, it indirectly prevents negative impacts by promoting responsible behaviour and value alignment. Resources include the sustainability budget and qualified internal personnel.

- **Establishment of the Tuscany Youth Coalition**

Launching in 2025, this multi-stakeholder association, based in the Empolese Valdelsa area, will engage businesses, institutions, families, and young people in creating a stable ecosystem of support for new generations through training, orientation, co-design, and active participation. The initiative aligns with SDGs 4, 10, 11 and 17, addressing social exclusion and disconnection between young people and the local production system. Monitoring will rely on quantitative (the number of members, projects launched) and qualitative (perceived impact, inclusivity) indicators. Resources include the sustainability budget, internal HR, and potential public funds activated through partners.

- **Development of a sustainability-aware management team**

Planned for 2025, this action aims to strengthen management awareness of sustainability, B Corp principles, and the company's common benefit purpose, with a particular focus on inclusion as a pillar of the sustainability culture. The initiative will include a dedicated workshop for managers led by external experts, exploring climate-related risks and the role of inclusion in integrating sustainability into business strategy. Effectiveness will be evaluated through qualitative participant feedback and operational follow-ups.

Overall, Sammontana SB's planned actions reflect a proactive and integrated approach to managing social impacts, based on listening, strategic coherence, and effectiveness measurements. They help mitigate reputational, cultural and organizational risks while generating tangible opportunities to strengthen the Group's social legitimacy.

S3-5 – Targets related to managing material negative impacts, and advancing positive impacts, and managing material risks and opportunities

Sammontana SB has defined a set of voluntary, measurable targets aimed at generating positive impacts on local communities and territorial stakeholders. These targets operationalize the Group's purpose – centred on people's well-being and the enhancement of future generations – and are closely linked to corporate policies on social responsibility, inclusion, participation and sustainability. Target-setting is based on structured processes involving traceable data, validated methodologies, and alignment with international standards, including the UN SDGs, B Corp guidelines, and ESRS reporting principles.

- **Economic and food support for communities**

One of the main targets concerns economic and food assistance to communities, through an annual donation budget. The goal is to maintain or exceed the €700,000 threshold achieved in 2023, distributed among donations of end-of-life products to combat food waste, donations of in-date products, and financial contributions to third-sector organizations. Monitoring is managed by the Sustainability Function and Management Control, ensuring alignment with company policies on community support and responsible management of production surpluses.

- **Corporate volunteering**

Another key target is to maintain or increase the number of employees requesting paid hours for volunteering. The Group actively promotes participation in social and environmental initiatives, recognizing donated time as a driver of positive impact and civic engagement. Monitoring is carried out through the HR system, in line with best practices in corporate volunteering and B Corp standards.

- **Dialogue and participation of territorial stakeholders**

Sammontana also aims to strengthen dialogue and active participation of local stakeholders during the double materiality assessment process. The goal is to progressively expand direct involvement of different stakeholder categories, ensuring increasingly inclusive and meaningful representation of perspectives relevant to the Group.

Each target is monitored by the Sustainability Function, in coordination with HR, CSR and Management Control, which track progress, correct deviations, and ensure alignment with the Group's corporate strategy and international standards. Overall, these targets confirm Sammontana's concrete and measurable commitment to building responsible local relationships and generating shared value, reinforcing its social legitimacy and territorial impact.

CONSUMERS AND END-USERS

SBM-2 – Interests and view of stakeholders

Sammontana recognizes final consumers as a key stakeholder group, potentially subject to significant impacts arising from the Group’s activities. For a detailed overview of how the interests, views and rights of consumers may inform the Group’s strategy and business model, please refer to the Chapter “General Information,” section “SBM-2 – Interests and views of stakeholders.” Consumer engagement regarding impacts is described in paragraph S4-2 of this Chapter.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

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

Table 31. Material impacts, risks and opportunities under the topic “Consumers and end-users” (S4)

Within Sammontana’s double materiality assessment, the topic **S4 – “Consumers and end-users”** emerged as material due to potential negative impacts related to privacy, food safety and responsible marketing.

A first potential impact concerns **customer privacy breaches following cyber-attacks**. This risk—linked to possible inadequacies in cybersecurity measures—could lead to unauthorized access to personal data and consequent reputational harm. The Group continuously monitors this risk, strengthening information security systems and employee training in line with EU data protection regulation (GDPR) and the governance safeguards described previously.

A second potential impact concerns **non-compliance with agri-food regulations**, which could compromise **product safety and quality**, with negative effects on consumer health and trust in the brand. This impact is associated with a significant **operational and reputational risk**, including potential sanctions, legal proceedings or claims. To prevent this, Sammontana applies an **integrated quality control and traceability system**, supported by periodic audits, in-house laboratories and third-party verification, within the **IFS and BRC food safety** certification frameworks.

Impacts were also identified in connection with the indulgent nature of Sammontana’s products, which call for balanced consumption. Despite this product nature, no cases of misleading communication have occurred; therefore, the risk remains potential. The Group

mitigates the risk by actively promoting responsible consumption through calibrated portion sizes and transparent nutritional information. Marketing activities, particularly regarding vulnerable groups such as minors, are considered **potential** risks since no misleading communications have occurred. To mitigate this risk, Sammontana adopts internal pre-clearance procedures, guidelines consistent with self-regulatory advertising codes, and periodic training for marketing staff and agency partners. These tools ensure that every communication is clear, truthful and consistent with the Group's commitment to conscious and inclusive consumption.

Overall, the identified impacts and risks are integrated into the Group's broader **sustainability and preventive management strategy**, aimed at ensuring high standards of quality, transparency and consumer trust. These principles—grounded in responsibility and continuous improvement—are captured in the company's **first common benefit purpose** as a Benefit Corporation; see the **Impact Report** for further details.

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

Sammontana has implemented a comprehensive set of policies and governance tools to protect consumers and end-users across its entire value chain. These measures focus on transparency, safety, fair communication, and the protection of personal data. The policies are fully integrated into the Group's governance and compliance system, which includes the Organizational Model 231. A dedicated Supervisory Body is responsible for monitoring compliance with internal procedures and ethical standards. To promote accountability, Sammontana has established whistleblowing channels that ensure confidentiality, safeguard whistleblowers, and protect them from retaliation when reporting non-compliant behaviour.

The **Ethical Marketing Policy** defines guiding principles for responsible, truthful and respectful commercial communication, with a specific focus on protecting minors. Applied to all product lines and to every written, audio or visual communication, it aims to prevent misleading or unethical messages and to foster transparent dialogue with consumers. The policy is inspired by established external standards such as the ICC Code, the Italian Consumer Code, Guidelines of the Children's Ombudsperson, IAP Regulations and the Digital Chart.

The **Customer Privacy Notice** was drafted in accordance with EU Regulation 2016/679 (GDPR). It governs the protection of consumers' personal data, guaranteeing rights of transparency, access, rectification and erasure. While not a sustainability policy per se, it is a fundamental safeguard for privacy and customer trust, aligned with the Group's ethical and reputational commitments.

The **external Social Media Policy** regulates interaction between the Group and users on digital platforms, defining permitted content, expected behaviours and moderation methods. The policy prohibits offensive, discriminatory, deceptive or privacy-infringing content, promoting an inclusive and respectful digital environment. It is aligned with the UN Guiding Principles on Business and Human Rights and OECD Guidelines, addressing reputational, legal and social risks related to online communications. It also applies to influencers and content creators, who must disclose promotional content in accordance with AGCM requirements.

Although not directly aimed at consumers, Sammontana's **Anti-Corruption Code** plays an important role in protecting them by promoting integrity, fairness, and transparency in commercial practices and communications. The Code was approved by the Board of Directors and signed by the CEO, and it draws on key international frameworks, including the UN Convention against Corruption and the OECD Convention.

Sammontana recognizes the strategic importance of its relationship with consumers and is committed to continuously strengthening its governance in this area. This includes integrating principles of responsibility, transparency, and respect for human rights into its operations. To date, no violations of the UN Guiding Principles on Business and Human Rights (UNGPs) or the OECD Guidelines related to consumers have been reported. The Group maintains structured tools to prevent non-compliant behaviour and to ensure the effectiveness of its policies.

S4-2 – Processes for engaging with consumers and end-users about impacts

To ensure a structured and continuous dialogue on its impacts, Sammontana has developed a multichannel listening system that places the consumer at the centre of the improvement cycle.

Facilitated access to contact channels: Sammontana offers multiple contact channels, including a toll-free number managed by an external operator, a dedicated email inbox, an online form on the corporate website, and social media platforms monitored by a media agency. In addition, consumers can engage directly through the Group's commercial network. All reports and feedback are collected in a centralized database managed by the Quality Function, ensuring complete traceability and enabling effective trend analysis.

Engagement of value chain partners: For private-label products, Sammontana works closely with retailers' customer care teams and co-packers to ensure consistent management of the consumer relationship throughout the value chain.

Internal monitoring and sharing: Data collected from consumer interactions is used to generate weekly, monthly, and semi-annual reports, which are reviewed in dedicated meetings with the Plant, Production, and Quality Departments. An annual summary, prepared by the front-line outsourcer, is included in the management review and helps define improvement priorities.

Management of formal complaints: For cases requiring a structured response, as outlined in S4-3, Sammontana activates its complaints management system according to procedure PO14.05, part of the Quality Management System. In the near future, these procedures will be integrated and harmonized across the Group to establish a unified and coherent Management System. The procedures clearly define roles, responsibilities, and process flows for receiving, analyzing, and resolving complaints, following a consumer-focused approach that upholds high standards of quality, transparency, and reliability.

Through this process, Sammontana systematically incorporates consumer feedback, reports, and complaints into its management systems and continuous improvement plans, ensuring effective responses, full traceability, and proactive prevention of future issues.

S4-3 – Processes to remediate negative impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

Sammontana operates a structured system for managing complaints and reports from consumers and customers, aimed at ensuring active listening, timely responses, and effective resolution of any negative impacts related to its products or services. This system puts into practice the engagement process described in S4-2 and is based on procedure PO14.05, which forms part of the Quality Management System previously certified to ISO 9001. Although the certification is no longer in place, the Group continues to update and harmonize its procedures across Group entities to build a unified and coherent Management System.

Management of serious complaints

In the event of material complaints—such as the presence of foreign bodies in products—Sammontana’s process includes direct contact with the consumer, technical analysis of the product, documentation requests from the co-packer, and the involvement of both the Legal Office and the Insurer. When necessary, the product recall or withdrawal procedure (PO13) is activated. The effectiveness of remediation is evaluated based on case resolution, customer satisfaction, and the implementation of corrective or preventive actions.

Reporting channels

Sammontana provides several official channels—toll-free number, dedicated email, web form, social networks and the commercial network. Each complaint is recorded in the central Quality database, ensuring full traceability, trend analysis and targeted corrective action.

Collaboration across the value chain

For private-label products, the Group collaborates with the customer care services and with co-packers, requesting necessary technical documentation and, where appropriate, initiating supplier audits to verify proper complaint handling and prevent recurrence.

Monitoring and improvement

Collected data is used to generate weekly, monthly, and semi-annual reports, which are discussed with the Plant, Production, and Quality Departments. An annual summary contributes to the management review and helps define improvement priorities. In addition to direct feedback, Sammontana monitors indirect trust indicators such as response timeliness, relationship quality, and case resolution rate.

Protection and transparency

The Group guarantees confidentiality, fairness and protection against retaliation for all users of the reporting channels. The system is a fundamental safeguard for consumer rights and for the prevention and mitigation of negative impacts along the downstream value chain.

Sammontana intends to progressively strengthen these tools, including through active stakeholder engagement and alignment with international consumer rights standards.

S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

Sammontana has implemented and planned a series of ongoing actions to prevent, mitigate, and, where necessary, remediate actual and potential impacts on consumers and end-users. These actions also aim to identify opportunities for social and environmental improvement along the value chain. They are based on a structured risk and opportunity assessment process, which draws on materiality analysis, market research, direct consumer feedback, and continuous performance monitoring. All initiatives are integrated into the Group's governance and compliance system. In cases requiring remediation, actions are managed under procedure PO14.05, which forms part of the Quality Management System.

Actions taken

- **“Communicating Sustainability”** (Impact Story, **2023 Impact Report** – first common benefit purpose): an initiative to ensure transparency and consistency in communicating common benefit commitments by providing concise yet structured information on product packaging, with links to digital deep-dives. This enabled consumers to choose different levels of reading based on interest and knowledge, strengthening awareness and trust and contributing to **SDG 12.8** (information and awareness for sustainable lifestyles). Managed by cross-functional teams (Marketing, Sustainability, Legal, ICT), the initiative served as a preventive measure against greenwashing, involving all company brands.
- **A conservative repositioning of ESG communication**: in line with European directives aimed at preventing greenwashing, Sammontana has chosen to discontinue ESG performance messaging on product packaging, focusing instead on communication through its corporate website. This deliberately cautious approach reflects the Group's strong sense of responsibility towards consumers and reinforces its commitment to transparency and reliability, while also safeguarding its reputation.
- **“Amando”** product line (inclusive nutrition): developed to meet the needs of consumers with intolerances or specific dietary preferences—such as lactose intolerance, coeliac disease, or vegan diets—the Amando line helps prevent the exclusion of vulnerable groups from food choices, promoting equitable access and inclusion. Monitoring is carried out through sales analysis, consumer feedback, and ongoing product updates, supported by R&D, Quality, Procurement, Marketing, and the Sustainability Function. External certifiers are also involved, in alignment with European policies on health and inclusive nutrition.
- **Responsible advertising guidelines**: Sammontana has adopted internal guidelines for responsible advertising, aligned with the Italian Self-Regulatory Code for Advertising and Directive 2005/29/EC on Unfair Commercial Practices. The goal is to ensure

ethical and truthful communication that reflects the Group's ESG values. This ongoing initiative applies to all marketing campaigns and includes internal training, pre-clearance procedures, and corrective actions in response to any reports—helping to prevent reputational risks and strengthen consumer trust.

All actions are grounded in structured assessment processes, including the analysis of emerging needs, stakeholder consultation, and alignment with applicable regulations and international standards. The Group applies the **Organisation, Management and Control Model pursuant to Legislative Decree 231/2001**, with a dedicated Supervisory Body overseeing compliance with internal procedures and ethical principles, including commercial practices and consumer communications. Any non-compliant behaviour can be reported through **whistleblowing** channels, which guarantee confidentiality, protection, and non-retaliation. No serious incidents or violations related to consumer rights have been reported. Dedicated resources include specialized internal teams, external agencies, and digital tools for effective management and monitoring. The effectiveness of these actions is evaluated continuously through both qualitative and quantitative updates, supporting ongoing improvement.

Planned actions

- Trend analysis on perceived product quality (**brand health checks**): a key future action involves the periodic collection and analysis of data to monitor consumer expectations and evaluations, identify issues and steer product and communication strategies. Covering the entire product portfolio marketed in Italy, it will start in 2025 and be monitored annually through satisfaction, liking and recommendation (NPS) indicators. The initiative is led by Marketing and Consumer Insights with support from external research firms and a dedicated budget.
- **Extension of the Ethical Marketing Policy across the Group**: another planned action aims to roll out the Ethical Marketing Policy group-wide to strengthen commitment to responsible commercial practices. Effectiveness will be monitored through reputational assessments and consumer feedback.

Both actions address material risks such as loss of trust, misalignment between perception and product reality, or spread of misleading messages, while representing strategic opportunities to enhance **brand reputation**, increase loyalty and differentiate in the market with an ethical, transparent and continuously improving approach. No incidents or human rights violations have been reported in these impact areas; nonetheless, the initiatives are designed to prevent them systematically.

S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Sammontana SB has defined a specific, measurable target to strengthen its commitment to consumers, with particular attention to perceived quality, offer inclusivity and the promotion of responsible consumption. Any material reports or complaints by consumers in the context of achieving these targets are recorded and managed under procedure P014.05 within the Quality Management System.

The target concerns increasing the share of revenue generated by products developed to address emerging consumer needs, such as the **Amando** line. The aim is to offer solutions combining taste and well-being, reducing the use of animal-derived ingredients and prioritizing low-impact processes. With the expansion to the new Group perimeter, the share of products designed for emerging dietary needs, particularly vegan lines, is increasing. This development is detailed in the **2024 Impact Report** under the first common benefit purpose.

The scope covers commercial and product development activities in the Italian market, with potential future extension to other European markets. The baseline, previously defined for Sammontana SB, will be recalibrated for the new Group perimeter.

Monitoring is ensured through economic KPIs (market share, revenue share), reputational KPIs (brand perception) and environmental KPIs (product LCA analysis).

The initiative is fully aligned with European guidelines on sustainable consumption, including the **Green Deal** and the **Farm to Fork** strategy, and is grounded in scientific evidence on the impact of plant-based diets on health and climate. Consumer engagement takes place via surveys, customer care and digital channels, ensuring that feedback and perceptions guide product and communication strategies.

Progress will be assessed annually, with adjustments in case of significant deviations. The monitoring system relies on structured data collection, trend analysis and stakeholder engagement, applying scientifically validated methodologies and sector benchmarks. To date, no incidents or material issues have been reported in these areas. The Group maintains active control and review mechanisms to ensure consistency between strategic objectives, operational practices and consumer expectations.

GOVERNANCE INFORMATION

BUSINESS CONDUCT

GOV-1 – The role of the administrative, management and supervisory bodies

The role of the administrative, management, and supervisory bodies, as described in the “General Information – GOV-1” chapter, also extends to the area of business conduct. Responsibility for corporate conduct lies with the Group’s Board of Directors, which ensures strategic oversight of this topic. As of the date of publication of this Sustainability Report, the Board is supported by the Sustainability Steering Committee, an advisory body composed of key managerial and industrial figures, including:

- Chiara Di Cesare – Head of Sustainability & Impact
- Alessandro Angelon – CEO
- Leonardo Bagnoli – Vice-Chairman of Sammontana Italia
- Lorenzo e Sibilla Bagnoli – members of the Bagnoli family (which indirectly holds 57% of the share capital of the Group)
- Guido Calò – Director of Research & Development and Quality
- Carlo Chizzolini – Industrial and Environmental Director
- Annalisa Ferri –Marketing Director
- Stefano Giusti – CFO

In 2024, an Executive Committee was formed with the participation of several members of the Board of Directors.

IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

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

Table 32. Material impacts, risks and opportunities under the topic “Business conduct” (G1)

Following the double materiality assessment, Sammontana identified four negative impacts linked to its activities.

The first relates to the need for ongoing internal training on sustainability topics. To foster a corporate culture aligned with ESG values, the Group aims to integrate dedicated training modules accessible to the majority of employees.

The second concerns the potential failure of the whistleblowing system and the Supervisory Body currently in place. Such a failure could compromise the Group's ability to prevent and detect irregularities.

The third impact involves incomplete oversight of the supply chain at Group level. Weaknesses in unified supplier selection criteria based on environmental and social parameters—particularly following the 2024 integration of Forno d'Asolo— could lead to issues along the value chain.

The fourth impact assessed is the potential occurrence of unlawful behaviours, including corruption, fraud, extortion, collusion, or money laundering.

In addition to these risks, two positive impacts were identified.

The first is the promotion of ethics and transparency through the reverse merger process, under which Sammontana Italia, Forno d'Asolo and S.I.P.A. - Società Italiana Prodotti Alimentari S.p.A. are expected to merge by way of incorporation into Sammontana SB, effective on December 31, 2025. With the adoption of Benefit Corporation status, the Group will extend its ESG commitments across its entire structure starting January 2026.

The second positive impact concerns animal welfare. Sammontana SB exclusively sources eggs from cage-free hens, is progressively phasing out combined cages, and requires its dairy suppliers to adhere to the highest animal welfare standards.

Lastly, a risk was identified related to potential legal disputes and reputational damage stemming from unlawful activities.

G1-1 – Business conduct policies and corporate culture

Corporate policies relating to business conduct include the **Anti-Corruption Policy** and the **Whistleblowing Policy**. Both are aligned with the mission of the Benefit Corporation, which is committed to pursuing the common good and operating responsibly, sustainably, and transparently towards people, the environment, the territory, and other stakeholders. These policies apply to the entire Group, and responsibility for their implementation lies with the Head of Impact and Sustainability. They are available both on the corporate intranet and the official website.

The Group adopts a structured approach to managing reports through a whistleblowing system that allows for the reporting of violations related to the principles of Organizational Model 231. The procedure, compliant with Legislative Decree 24/2023, establishes an internal system for receiving and handling reports from both internal and external parties. The channel facilitates the reporting of conduct that could generate negative impacts, including those affecting workers along the value chain. The system's effectiveness is ensured by a formalized process that includes receipt, analysis, investigation, and archiving of reports, in full

compliance with confidentiality and personal data protection. The Whistleblowing Officer serves as the point of reference for handling reports and acts as a liaison between the relevant corporate functions.

The internal reporting channel is accessible to a wide range of parties: direct employees, collaborators, agency workers, self-employed individuals, consultants, volunteers, interns, and shareholders. Management of reports is confidential and supported by measures ensuring security and anonymity. Reports are handled by an external independent third party – a team of lawyers from Deloitte, selected for their expertise and impartiality. Although no explicit requirements currently extend to suppliers, the system can also apply to supply chain operators when they fall within the Group’s “work context.”

Reports are tracked and managed using structured tools and procedures with advanced technical and organizational measures. Data not relevant to the report are anonymized, and access is restricted to authorized, trained personnel. The protections offered are extensive and applicable to multiple categories. The procedure explicitly provides safeguards against any form of retaliation, in line with the decree, and its structure and guarantees reflect the standards required in terms of transparency and human rights. All activities comply fully with confidentiality requirements and personal data protection laws (Articles 12 and 13 of the Whistleblowing Decree). There is no direct assessment of awareness of the channel among workers in the value chain.

The main risks mitigated by this initiative include internal corruption, fraud, workplace harassment, and other forms of misconduct. The opportunities generated include strengthening corporate reputation, improving legal risk management, and fostering an internal culture consistent with the Group’s values.

G1-2 – Management of relationships with suppliers

The Group recognizes the value of relationships with its suppliers as a key driver for promoting a sustainable and responsible supply chain. The entire co-design process of the Supplier Code of Conduct and related workshops originally concerned Sammontana SB (2023). This approach aligns with the Group’s Code of Ethics and Code of Conduct, already described in the introductory chapters, which define the framework for supplier relations and responsible supply chain management.

- The integration of **Forno d’Asolo Group** in 2024 expanded the supplier base and initiated a **process of rationalization and optimization** led by Sammontana’s model, aiming to gradually harmonize culture, practices, and ESG standards.
- Training and the dissemination of ESG culture among Forno d’Asolo suppliers will be developed **in 2025** as a continuation of the journey already undertaken by Sammontana Benefit.

In 2023, Sammontana SB co-designed its Supplier Code of Conduct, distinguishing between basic practices and advanced practices. During a dedicated workshop, the document was reviewed together with selected key suppliers, fostering open and constructive dialogue on its contents. This experience led to the creation of a questionnaire designed to analyze supplier performance, enable classification, and identify strategic interdependencies for shared

project development. In 2024, the process evolved with a second workshop focused on three advanced themes:

- Diversity & Inclusion
- Circular Modes
- Emission Reduction

During the event, strategic supplier companies participated in six working groups, sharing experiences, challenges, and best practices. This collaboration resulted in six joint projects that will be developed over the coming year as genuine “shared sustainability workstreams.”

This initiative represents a profound shift in the way supplier relationships are conceived – from a hierarchical, linear dynamic to a co-evolution based on trust, transparency, and a shared vision. Together with its supply chain partners, the Group is building an ecosystem capable of generating positive impact along the entire value chain, making sustainability a key driver of innovation and competitiveness.

The integration of Forno d’Asolo Group has significantly expanded the Group’s supplier base, which is now undergoing a systematic evaluation as part of the transformation and synergy process aimed at rationalizing the Group’s supply chain, following the guidelines established by Sammontana SB.

G1-3 – Prevention and detection of corruption and bribery

The Group has implemented a structured system to prevent, detect, investigate, and manage any reports or incidents related to corruption and extortion. This system is based on three main instruments: the Organizational Model 231, the Anti-Corruption Code, and the Whistleblowing Procedure, described in detail in chapter G1-1. Together, these tools form the reference framework for promoting corporate integrity and protecting against unlawful behaviour, ensuring transparency and accountability. To complement this system, Sammontana promotes awareness and training activities for employees and collaborators to foster a culture of integrity and ensure full understanding of rules and expected behaviours. Each year, most employees receive training on the main contents of the Organizational Model 231 and the Whistleblowing Procedure, which are also fully illustrated on the company’s website.

G1-4 – Incidents of corruption or bribery

In 2024, no violations of anti-corruption laws or regulations were identified.

G1-6 – Payment practices

Sammontana formalizes all supply agreements through contracts that clearly define payment methods and terms, in full compliance with applicable laws. While pursuing sustainable economic and financial balance, the Group places strong emphasis on punctual fulfilment of contractual obligations, in line with both general and sector-specific regulations.

This approach, combined with the sharing of ethical principles with business partners, supports responsible management of financial commitments toward suppliers.

Payment terms are contractually defined, fair, and aligned with market standards, with particular attention to the needs of small and medium-sized enterprises (SMEs).

Standard payment terms by supplier category:

- Perishable products: 30;
- Other agricultural and food products: 60 days;
- Packaging: 60–120 days;
- Services: 60–90 days.

In 2024, the average invoice payment time, calculated from the contractual due date, was 86 days across all categories listed above. Currently, there are no ongoing legal proceedings related to payment delays.

ESRS CONTENT INDEX

Please note that only the relevant topics of the ESRS have been included in addition to mandatory ESRS 2.

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| ESRS E4 | E4-1 | Transition plan and consideration of biodiversity and ecosystems in strategy and business model | E4-1 - Transition plan and consideration of biodiversity and ecosystems in strategy and business model | 31 |
| ESRS E4 | E4-2 | Policies related to biodiversity and ecosystems | E4-2 - Policies related to biodiversity and ecosystems | 31 |
| ESRS E4 | E4-3 | Actions and resources related to biodiversity and ecosystems | E4-3 - Actions and resources related to biodiversity and ecosystems | 31 |
| ESRS E4 | E4-4 | Targets related to biodiversity and ecosystems | E4-4 - Targets related to biodiversity and ecosystems | 32 |
| ESRS E4 | E4-5 | Impact metrics related to biodiversity and ecosystems change | E4-5 - Impact metrics related to biodiversity and ecosystems change | N/A |

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|---------------------------|-------|---|---|-----|
| ESRS E4 | E4-6 | Anticipated financial effects from material biodiversity and ecosystem-related risks and opportunities | E4-6 - Anticipated financial effects from material biodiversity and ecosystem-related risks and opportunities | N/A |
| ESRS E5 | IRO-1 | Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities | IRO-1 - Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities | 33 |
| ESRS E5 | E5-1 | Policies related to resource use and circular economy | E5-1 - Policies related to resource use and circular economy | 34 |
| ESRS E5 | E5-2 | Actions and resources related to resource use and circular economy | E5-2 - Actions and resources related to resource use and circular economy | 34 |
| ESRS E5 | E5-3 | Targets related to resource use and circular economy | E5-3 - Targets related to resource use and circular economy | 34 |
| ESRS E5 | E5-4 | Resource inflows | E5-4 - Resource inflows | 34 |
| ESRS E5 | E5-5 | Resource outflows | E5-5 - Resource outflows | 34 |
| ESRS E5 | E5-6 | Anticipated financial effects from material impacts, risks, and opportunities related to resource use and circular economy | E5-6 - Anticipated financial effects from material impacts, risks, and opportunities related to resource use and circular economy | N/A |
| SOCIAL INFORMATION | | | | |
| ESRS S1 | SBM-2 | Interests and views of stakeholders | SBM-2 - Interests and views of stakeholders | 36 |
| ESRS S1 | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model | 36 |
| ESRS S1 | S1-1 | Policies related to own workforce | S1-1 - Policies related to own workforce | 37 |
| ESRS S1 | S1-2 | Processes for engaging with own workforce and workers' representatives about impacts | S1-2 - Processes for engaging with own workforce and workers' representatives about impacts | 38 |

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|---------|-------|--|---|-----|
| ESRS S1 | S1-3 | Processes to remediate negative impacts and channels for own workforce to raise concerns | S1-3 - Processes to remediate negative impacts and channels for own workforce to raise concerns | 39 |
| ESRS S1 | S1-4 | Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions | S1-4 - Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions | 40 |
| ESRS S1 | S1-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | 43 |
| ESRS S1 | S1-6 | Characteristics of the undertaking's employees | S1-6 - Characteristics of the undertaking's employees | 44 |
| ESRS S1 | S1-7 | Characteristics of non-employees in the undertaking's own workforce | S1-7 - Characteristics of non-employees in the undertaking's own workforce | N/A |
| ESRS S1 | S1-8 | Collective bargaining coverage and social dialogue | S1-8 - Collective bargaining coverage and social dialogue | 45 |
| ESRS S1 | S1-9 | Diversity metrics | S1-9 - Diversity metrics | 45 |
| ESRS S1 | S1-10 | Adequate wages | S1-10 - Adequate wages | 46 |
| ESRS S1 | S1-11 | Social protection | S1-11 - Social protection | N/A |
| ESRS S1 | S1-12 | Persons with disabilities | S1-12 - Persons with disabilities | N/A |
| ESRS S1 | S1-13 | Training and skills development metrics | S1-13 - Training and skills development metrics | N/A |
| ESRS S1 | S1-14 | Health and safety metrics | S1-14 - Health and safety metrics | 46 |
| ESRS S1 | S1-15 | Work-life balance metrics | S1-15 - Work-life balance metrics | N/A |

| | | | | |
|---------|-------|--|---|-----|
| ESRS S1 | S1-16 | Remuneration metrics (pay gap and total remuneration) | S1-16 - Remuneration metrics (pay gap and total remuneration) | 47 |
| ESRS S1 | S1-17 | Incidents, complaints and severe human rights impacts | S1-17 - Incidents, complaints and severe human rights impacts | N/A |
| ESRS S2 | SBM-2 | Interests and views of stakeholders | SBM-2 - Interests and views of stakeholders | 48 |
| ESRS S2 | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model | 48 |
| ESRS S2 | S2-1 | Policies related to value chain workers | S2-1 - Policies related to value chain workers | 49 |
| ESRS S2 | S2-2 | Processes for engaging with value chain workers about impacts | S2-2 - Processes for engaging with value chain workers about impacts | 50 |
| ESRS S2 | S2-3 | Processes to remediate negative impacts and channels for value chain workers to raise concerns | S2-3 - Processes to remediate negative impacts and channels for value chain workers to raise concerns | 51 |
| ESRS S2 | S2-4 | Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions | S2-4 - Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions | 51 |
| ESRS S2 | S2-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | S2-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | 53 |
| ESRS S3 | SBM-2 | Interests and views of stakeholders | SBM-2 - Interests and views of stakeholders | 54 |
| ESRS S3 | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model | 54 |

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|---------|-------|--|---|----|
| ESRS S3 | S3-1 | Policies related to affected communities | S3-1 - Policies related to affected communities | 55 |
| ESRS S3 | S3-2 | Processes for engaging with affected communities about impacts | S3-2 - Processes for engaging with affected communities about impacts | 55 |
| ESRS S3 | S3-3 | Processes to remediate negative impacts and channels for affected communities to raise concerns | S3-3 - Processes to remediate negative impacts and channels for affected communities to raise concerns | 56 |
| ESRS S3 | S3-4 | Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions | S3-4 - Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions | 56 |
| ESRS S3 | S3-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | S3-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | 59 |
| ESRS S4 | SBM-2 | Interests and views of stakeholders | SBM-2 - Interests and views of stakeholders | 61 |
| ESRS S4 | SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model | 61 |
| ESRS S4 | S4-1 | Policies related to consumers and end-users | S4-1 - Policies related to consumers and end-users | 62 |
| ESRS S4 | S4-2 | Processes for engaging with consumers and end-users about impacts | S4-2 - Processes for engaging with consumers and end-users about impacts | 63 |
| ESRS S4 | S4-3 | Processes to remediate negative impacts and channels for consumers and end-users to raise concerns | S4-3 - Processes to remediate negative impacts and channels for consumers and end-users to raise concerns | 64 |
| ESRS S4 | S4-4 | Taking action on material impacts on consumers and end-users, and | S4-4 - Taking action on material impacts on | 65 |

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|-------------------------------|-------|--|--|-----|
| | | approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions | consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions | |
| ESRS S4 | S4-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | S4-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities of significant risks and opportunities | 66 |
| GOVERNANCE INFORMATION | | | | |
| ESRS G1 | GOV-1 | The role of the administrative, management and supervisory bodies | GOV-1 - The role of the administrative, management and supervisory bodies | 68 |
| ESRS G1 | IRO-1 | Description of the processes to identify and assess material impacts, risks, and opportunities | IRO-1 - Description of the processes to identify and assess material impacts, risks, and opportunities | 68 |
| ESRS G1 | G1-1 | Business conduct policies and corporate culture | G1-1 - Business conduct policies and corporate culture | 69 |
| ESRS G1 | G1-2 | Management of relationships with suppliers | G1-2 - Management of relationships with suppliers | 70 |
| ESRS G1 | G1-3 | Prevention and detection of corruption and bribery | G1-3 - Prevention and detection of corruption and bribery | 71 |
| ESRS G1 | G1-4 | Incidents of corruption or bribery | G1-4 - Incidents of corruption or bribery | 71 |
| ESRS G1 | G1-5 | Political influence and lobbying activities | G1-5 - Political influence and lobbying activities | N/A |
| ESRS G1 | G1-6 | Payment practices | G1-6 - Payment practices | 71 |

Table 33. ESRS content index

LIST OF DATAPPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION

| Disclosure Requirement and related datapoint | SFDR reference ³ | Pillar reference ⁴ | Benchmark regulation reference ⁵ | EU Climate Law reference ⁶ | Page | Non-material |
|---|------------------------------------|---|--|---------------------------------------|------|--------------|
| ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d) | Annex I, table 1, indicator no. 13 | | Commission Delegated Regulation (EU) 2020/1816, annex II | | 4 | - |
| ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e) | | | Commission Delegated Regulation (EU) 2020/1816, annex II | | 4 | - |
| ESRS 2 GOV-4 Statement on due diligence paragraph 30 | Annex I, table 3, indicator no. 10 | | | | 5 | - |
| ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i | Annex I, table 1, indicator no. 4 | Article 449 bis of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, table 1 - Qualitative information on environmental risk and table 2 - Qualitative information on social risk | Commission Delegated Regulation (EU) 2020/1816, annex II | | 6 | - |

³ 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 (SFDR) (OJ L 317, 9.12.2019, p. 1);

⁴ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation) (OJ L 176, 27.6.2013, p. 1);

⁴ 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);

⁵ 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 Regulation (EC) No 401/2009 and Regulation (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9.7.2021, p. 1).

| | | | | | | |
|--|------------------------------------|--|---|--|-----|---|
| ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii | Annex I, table 2, indicator no. 9 | | Commission Delegated Regulation (EU) 2020/1816, annex II | | N/A | X |
| ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii | Annex I, table 1, indicator no. 14 | | Article 12, paragraph 1, of the delegated regulation (EU) 2020/1818 and Annex II of the delegated regulation (EU) 2020/1816 | | N/A | X |
| ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv | | | Article 12, paragraph 1, of the delegated regulation (EU) 2020/1818 and Annex II of the delegated regulation (EU) 2020/1816 | | N/A | X |
| ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14 | | | | Article 2, paragraph 1, of the regulation (EU) 2021/1119 | 15 | - |
| ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g) | | Article 449 bis of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Banking book - Indicators of potential transition risk related to climate change: Credit quality of exposures by sector, emissions, | Article 12, paragraph 1, letters a to g), and paragraph 2, of Delegated Regulation (EU) 2020/1818 | | 15 | - |

| | | | | | | |
|---|---|--|--|--|----|---|
| | | and residual maturity | | | | |
| ESRS E1-4 GHG emission reduction targets paragraph 34 | Annex 1, table 2, indicator no. 4 | Article 449 bis of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking portfolio - Indicators of the potential transition risk related to climate change: alignment metrics | Article 6 of Delegated Regulation (EU) 2020/1818 | | 18 | - |
| ESRS E1-5 Consumption of energy from fossil fuels disaggregated by source (only high climate impact sectors), paragraph 38 | Annex 1, table 1, indicator no. 5 and Annex 1, table 2, indicator no. 5 | | | | 19 | - |
| ESRS E1-5 Energy consumption and energy mix, paragraph 37 | Annex 1, table 1, indicator no. 5 | | | | 19 | - |
| ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43 | Annex 1, table 1, indicator no. 6 | | | | 19 | - |
| ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44 | Annex 1, table 1, indicators nos. 1 and 2 | Article 449 bis of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Banking book - Indicators of potential transition risk | Article 5, paragraph 1, article 6 and article 8, paragraph 1, of Delegated Regulation (EU) 2020/1818 | | 20 | - |

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|---|-----------------------------------|--|---|--|-----|---|
| | | related to climate change: Credit quality of exposures by sector, emissions, and residual maturity | | | | |
| ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55 | Annex I, table 1, indicator no. 3 | Article 449 bis of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking portfolio - Indicators of the potential transition risk related to climate change: alignment metrics | Article 8, paragraph 1, of Delegated Regulation (EU) 2020/1818 | | N/A | - |
| ESRS E1-7 GHG removals and carbon credits paragraph 56 | | | | Article 2, paragraph 1, of the regulation (EU) 2021/1119 | 21 | - |
| ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66 | | | Annex II of Delegated Regulation (EU) 2020/1818 and Annex II of Delegated Regulation (EU) 2020/1816 | | N/A | - |
| ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c). | | Article 449 bis of Regulation (EU) No. 575/2013; points 46 and 47 of Commission Implementing Regulation (EU) | | | N/A | - |

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|---|--|---|---|--|-----|---|
| | | 2022/2453; template 5: Banking portfolio - Indicators of potential physical risk related to climate change: exposures subject to physical risk | | | | |
| ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c). | | Article 449 bis of Regulation (EU) No. 575/2013; point 34 of Commission Implementing Regulation (EU) 2022/2453; Template 2: Banking portfolio - Indicators of potential transition risk related to climate change: loans secured by real estate - Energy efficiency of collateral | | | N/A | X |
| ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69 | | | Annex II of the delegated regulation (EU) 2020/1818 | | N/A | X |
| ESRS E2-4 Amount of each pollutant listed in Annex II of the EPRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28 | Annex I, table 1, indicator no. 8; annex I, table 2, indicator no. 2; annex 1, table 2, indicator no. 1; annex I, table 2, | | | | N/A | - |

| | | | | | | |
|--|---|--|--|--|-----|---|
| | indicator no. 3 | | | | | |
| ESRS E3-1 Water and marine resources paragraph 9 | Annex 1, table 2, indicator no. 7 | | | | 25 | - |
| ESRS E3-1 Dedicated policy paragraph 13 | Annex 1, table 2, indicator no. 8 | | | | N/A | - |
| ESRS E3-1 Sustainable oceans and seas paragraph 14 | Annex 1, table 2, indicator no. 12 | | | | N/A | X |
| ESRS E3-4 Total water recycled and reused paragraph 28 (c) | Annex 1, table 2, indicator no. 6.2 | | | | 28 | - |
| ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29 | Annex 1, table 2, indicator no. 6.1 | | | | N/A | - |
| ESRS 2- SBM 3 - E4 paragraph 16 (a) | Indicator number 7 Table #1 of Annex 1 | | | | 30 | - |
| ESRS 2- SBM 3 - E4 paragraph 16 (b) | Indicator number 10 Table #2 of Annex 1 | | | | N/A | - |
| ESRS 2- SBM 3 - E4 paragraph 16 (c) | Indicator number 14 Table #2 of Annex 1 | | | | N/A | - |
| ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b) | Annex 1, table 2, indicator no. 11 | | | | 31 | - |
| ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c) | Annex 1, table 2, indicator no. 12 | | | | N/A | X |

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|---|--|--|--|--|-----|---|
| ESRS E4-2 Policies to address deforestation paragraph 24 (d) | Annex I, table 2, indicator no. 15 | | | | 31 | - |
| ESRS E5-5 Non-recycled waste paragraph 37 (d) | Annex I, table 2, indicator no. 13 | | | | 34 | - |
| ESRS E5-5 Hazardous waste and radioactive waste paragraph 39 | Annex I, table 1, indicator no. 9 | | | | 34 | - |
| ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f) | Annex I, table 3, indicator no. 13 | | | | N/A | X |
| ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g) | Annex I, table 3, indicator no. 12 | | | | N/A | X |
| ESRS S1-1 Human rights policy commitments paragraph 20 | Annex I, table 3, indicator no. 9 and annex I, table 1, indicator no. 11 | | | | 37 | - |
| ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21 | | | Commission Delegated Regulation (EU) 2020/1816, annex II | | 37 | - |
| ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22 | Annex I, table 3, indicator no. 11 | | | | N/A | X |
| ESRS S1-1 workplace accident prevention policy or management system paragraph 23 | Annex I, table 3, indicator no. 1 | | | | 37 | - |
| ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c) | Annex I, table 3, indicator no. 5 | | | | 39 | - |

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|---|---|--|---|--|-----|---|
| ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c) | Annex I, table 3, indicator no. 2 | | Commission Delegated Regulation (EU) 2020/1816, annex II | | N/A | - |
| ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e) | Annex I, table 3, indicator no. 3 | | | | 46 | - |
| ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a) | Annex I, table 1, indicator no. 12 | | Commission Delegated Regulation (EU) 2020/1816, annex II | | 47 | - |
| ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b) | Annex I, table 3, indicator no. 8 | | | | 47 | - |
| ESRS S1-17 Incidents of discrimination paragraph 103 (a) | Annex I, table 3, indicator no. 7 | | | | N/A | - |
| ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a) | Annex I, table 1, indicator no. 10 and annex I, table 3, indicator no. 14 | | Annex II of the delegated regulation (EU) 2020/1816 and article 12, paragraph 1, of the delegated regulation (EU) 2020/1818 | | N/A | - |
| ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b) | Annex I, table 3, indicators nos. 12 and 13 | | | | 48 | - |
| ESRS S2-1 Human rights policy commitments paragraph 17 | Annex I, table 3, indicator no. 9 and annex I, table 1, indicator no. 11 | | | | 49 | - |
| ESRS S2-1 Policies related to value chain workers paragraph 18 | Annex I, table 3, indicators nos. 11 and 4 | | | | 49 | - |

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|---|--|--|---|--|----|---|
| ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19 | Annex I, table 1, indicator no. 10 | | Annex II of the delegated regulation (EU) 2020/1816 and article 12, paragraph 1, of the delegated regulation (EU) 2020/1818 | | 49 | - |
| ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19 | | | Commission Delegated Regulation (EU) 2020/1816, annex II | | 49 | - |
| ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36 | Annex I, table 3, indicator no. 14 | | | | 51 | - |
| ESRS S3-1 Human rights policy commitments paragraph 16 | Annex I, table 3, indicator no. 9 and annex I, table 1, indicator no. 11 | | | | 55 | - |
| ESRS S3-1 nonrespect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17 | Annex I, table 1, indicator no. 10 | | Annex II of the delegated regulation (EU) 2020/1816 and article 12, paragraph 1, of the delegated regulation (EU) 2020/1818 | | 55 | - |
| ESRS S3-4 Human rights issues and incidents paragraph 36 | Annex I, table 3, indicator no. 14 | | | | 56 | - |
| ESRS S4-1 Policies related to consumers and end-users paragraph 16 | Annex I, table 3, indicator no. 9 and annex I, table 1, indicator no. 11 | | | | 62 | - |

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|--|------------------------------------|--|---|--|----|---|
| ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17 | Annex I, table 1, indicator no. 10 | | Annex II of the delegated regulation (EU) 2020/1816 and article 12, paragraph 1, of the delegated regulation (EU) 2020/1818 | | 62 | - |
| ESRS S4-4 Human rights issues and incidents paragraph 35 | Annex I, table 3, indicator no. 14 | | | | 65 | - |
| ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b) | Annex I, table 3, indicator no. 15 | | | | 69 | - |
| ESRS G1-1 Protection of whistleblowers paragraph 10 (d) | Annex I, table 3, indicator no. 6 | | | | 69 | - |
| ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a) | Annex I, table 3, indicator no. 17 | | Annex II of the delegated regulation (EU) 2020/1816 | | 71 | - |
| ESRS G1-4 Standards of anticorruption and antibribery paragraph 24 (b) | Annex I, table 3, indicator no. 16 | | | | 71 | - |

Table 34. List of datapoints in cross-cutting and topical standards that derive from other EU legislation