



Sustainability Statement 2024

Letter to stakeholders

Dear colleagues and partners,

At Nactarome, **sustainability** is an integral part of how we grow our business and our organisation. It guides the way we develop our flavour, taste, and colour solutions, as well as how we care for the people, customers, suppliers, and communities we work with.

2024 was a pivotal year. We continued bringing our European family closer together as One Nactarome, strengthening collaboration across all sites and building a more consistent and shared language around the Environmental, Social, and Governance (ESG) topics that matter most to our stakeholders.

As Europe's sustainability landscape evolves, we remain committed to aligning our approach with **international regulatory expectations**. The Company's 2024 Sustainability Statement has been prepared with reference to the new European Sustainability Reporting Standards (ESRS), released by EFRAG in 2023 to support the Corporate Sustainability Reporting Directive (CSRD). We are proud to begin disclosing our performance according to these standards already in FY 2024. This early adoption enables us to progressively reach full alignment with the ESRS well ahead of regulatory timelines.

The 2024 Statement has been drafted on the basis of the outcomes of Nactarome's **first Double Materiality Assessment (DMA)** carried out **in full alignment with the ESRS requirements** and the latest guidance issued by EFRAG. This assessment examined both the Company's actual and potential impacts on the environment and people, as well as the financial risks and opportunities arising from sustainability-related matters. It represents a significant milestone, laying the groundwork for a more structured, transparent, and forward-looking sustainability strategy.

At the same time, Nactarome remained focused on the essentials: **sound governance, credible data, and meaningful action** across our operations and supply chain. We strengthened transparency, advanced responsible sourcing initiatives, and continued harmonizing key policies and systems, while always valuing and leveraging local expertise. We believe that sustainability goes beyond ratings; it is rooted in understanding the real substance of our impacts and acting responsibly to improve them.

In this letter, I would like to highlight **three themes** that characterize our approach this year:

- **Collaboration:** working constructively with employees, customers, and suppliers to create long-term, shared value.
- **Clarity:** being open about our progress and our challenges, because trust grows from understanding.

- **Continuous progress:** learning, innovating, and improving step by step, driven by a shared purpose and curiosity at every level of the organisation.

Looking ahead, Nactarome's pathway involves further strengthening sustainability within our own operations and continuing to improve our overall performance. A key milestone for 2025 will be the calculation of our **full value chain greenhouse gas (GHG) emissions (Scope 3)** for the first time. This represents a fundamental step in our journey, as only what is measured can truly be improved. Building on this baseline, we will continue identifying opportunities to reduce environmental impacts while supporting the resilience of our supply chain.

Our ambition is to contribute to building a **fairer, more resilient future**. For Nactarome, this means creating value responsibly, fostering decent work and inclusive growth, investing in people's wellbeing and skills, and taking tangible actions for a healthier planet.

Our direction is clear: **turn commitment into action, and action into impact.**

Together, we will continue building a company that looks bright, tastes authentic, and acts responsibly.

Luigi Del Monaco

CEO - Nactarome Group S.p.A.

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General Disclosures

1. ESRS 2 General Disclosures

1.1 Basis for preparation

1.1.1 General basis for preparation of sustainability statement

[BP-1]

This Sustainability Statement has been prepared on a voluntary basis by **Nactarome S.p.A.** in alignment with the **European Sustainability Reporting Standards (ESRS)** and with reference to the **Global Reporting Initiative (GRI) Standards**, which served as the methodological framework. The document has been drafted in a manner that ensures the understandability, relevance, reliability, and comparability of the information disclosed, consistent with the qualitative characteristics set out in ESRS 1, Appendix B, EU Regulation 2023/2772.

The reporting period corresponds to the **2024 financial year**, from January 1 to December 31, 2024. The scope of reporting includes **Nactarome S.p.A. and all its consolidated subsidiaries**, covering operations in 9 countries and over 500 employees. The Sustainability Statement presents information on relevant **impacts, risks, and opportunities (IROs)** identified through Nactarome's double materiality assessment, involving internal stakeholders. The analysis considered the Company's full value chain, on both the upstream (raw material, packaging and energy suppliers) and the downstream value chain (customers and end-consumers).

Nactarome has not made use of the option to omit information concerning intellectual property, know-how, or innovation results, nor has it applied the exemption for disclosing information on upcoming developments or matters under negotiation. At present, **sustainability information is not subject to external assurance**, but the Company is committed to progressively strengthening internal processes for data validation and control in line with future regulatory requirements. The Sustainability Statement is made available to all stakeholders through publication on the Company's corporate website.

1.1.2 Disclosures in relation to specific circumstances

[BP-2]

In accordance with the **Corporate Sustainability Reporting Directive (CSRD)**, Nactarome is required to make the following disclosures within certain time horizons definitions. The Company adopts the following time intervals as of the end of the reporting period:

- for the **short-term** time horizons: one year, consistent with the reporting period adopted in the financial statements;
- for the **medium-term** time horizons: from the end of the short-term reporting period defined in (a) up to five years;
- for the **long-term** time horizons: more than five years.

The same time horizons apply to the impacts, risks, and opportunities identification and assessment process.

In preparing this Sustainability Statement, Nactarome has applied estimates and assumptions in certain areas, particularly with regard to AromataGroup and IPAM's consumption of non-renewable fuels for company fleet and Nactis Flavours' consumption of electricity.

To comply with disclosure requirement E1-6, "Gross Scopes 1, 2, 3 and Total GHG emissions", the reported CO₂-equivalent emissions were calculated using the Company's consumption data. For the calculation of direct emissions (**Scope 1**), emission factors from the DEFRA database were applied. Emissions related to electricity consumption (**Scope 2**) were calculated using both the market-based and location-based methods, as recommended by the GHG Protocol. For the Italian legal entities (i.e., AromataGroup and IPAM), emission factors from the ABI Guidelines were used, while for the other Nactarome companies (i.e., Calaf Nuances, Nactarome Ltd, Nactarome NV, Nactis Flavours, and Royal Buisman), the emission factors published in the AIB European Residual Mix were applied.

Furthermore, for environmental indicators, such as energy consumption and carbon footprint, data collection focused primarily on **direct operations**, while upstream and downstream activities' environmental indicators were not included in this Sustainability Statement, as this is the first ESRS-inspired Sustainability Statement published voluntarily by the Company. However, Nactarome aims to calculate its entire carbon footprint, including the value chain, using analyses and tools that align with major international calculation standards and references (e.g., the GHG Protocol) from the second half of 2025 onwards.

At the current stage, the boundaries of reporting include the operating companies within Nactarome, i.e. **AromataGroup, Calaf Nuances, IPAM, Nactarome Ltd, Nactarome NV, Nactis Flavours, and Royal Buisman**¹. Any deviations or limitations in data coverage are indicated via footnotes in the relevant sections of the Sustainability Statement. Starting in 2025, AromataGroup will officially acquire IPAM, leading to the creation of the new, entirely Italian legal entity, Nactarome S.r.l. and extending its policies and procedures to it. Nactarome is committed to enhancing transparency by expanding data coverage across the entire value chain, strengthening the integration of sustainability reporting processes, and preparing for full compliance with the CSRD requirements in the coming reporting cycles.

¹ Among the companies consolidated under Nactarome umbrella there are also Nactarome Iberia (non-operating), Nactarome Holding B.V. (non-operating), and Nactarome Australia (dormant).

1.2 Governance

1.2.1 The role of the administrative, management and supervisory bodies

[GOV-1]

Nactarome is wholly owned by **Nina Holdco S.p.A.**, whose governing body is composed of **two independent members, one representative from the private equity TA Associates**, and **one representative from the private equity Ambienta SGR S.p.A.** This ownership and governance structure ensures strategic oversight and balanced decision-making, combining independent perspectives with the expertise of the Company's main investors.

Nactarome has adopted a structured corporate governance system designed to ensure effective oversight, accountability, and alignment with the Company's long-term strategic objectives. Governance is exercised through three key bodies: the **Board of Directors (BoD)**, the **Board of Statutory Auditors**, and the **Board of External Auditors (BDO)**, which provides independent assurance on the Financial Statements and the Consolidated Accounts.

The **Board of Directors** is currently composed of six members, plus two observers, the most recent of whom joined in 2024. The BoD is entrusted with a dual mandate: overseeing the Company's strategic governance and managing the implementation of major Company programmes through the local legal entities. Directors are appointed for a three-year term by the shareholders and bring a combination of strategic vision, financial competence, and sector-specific expertise, ensuring that the interests of stakeholders are duly represented.

The **Board of Statutory Auditors** is composed of three members, two designated by the majority shareholder and one by the minority shareholder. Members are selected for their professional expertise and independence, guaranteeing rigorous and impartial oversight. Their mandate is three years.

The **Chairman of Nactarome S.p.A.**, Mr. Hans Udo Wenzel, also serves as chair of most of the Company's local entities. While not directly involved in daily operational management — whose responsibility lies with local General Managers holding P&L authority — he plays a central role in shaping the Company's strategic development and in the identification and evaluation of potential acquisitions. The Chairman does not intervene in the day-to-day operations of the business.

To ensure adequate oversight on sustainability-related issues, the BoD has actively participated in dedicated training sessions focused on the **Double Materiality Assessment (DMA)** and the relevant regulatory and methodological frameworks. Through this training, the BoD has developed a shared operational understanding of sustainability topics, which enabled it to effectively review and supervise related disclosures. Where further technical knowledge is required, the BoD may rely on internal functions or external experts to complement its decision-making.

The BoD also holds responsibility for the oversight, review, and approval of the **Company's Sustainability Statement**. This ensures that material impacts, risks, and opportunities and the Company's reporting process are consistent with corporate

strategy and stakeholder expectations. Nactarome's reporting process includes the collection and analysis of relevant sustainability data and information, followed by structured review, discussion, and final approval by the BoD, thereby embedding sustainability into the Company's overall governance framework.

Nactarome's Board of Directors	Women	Men	Total
Total number of members	0	7	7
	0%	100%	100%
Number of members with executive positions	0	6	6
	0%	86%	86%
Number of non-executive members	0	1	1
	0%	14%	14%
Number of independent members	0	1	1
	0%	14%	14%
Members representing employees and other workers	0	0	0
	0%	0%	0%
Members who have experience related to the undertaking's industries, products and geographic areas	0	5	5
	0%	71%	71%

1.2.2 Information provided to, and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

[GOV-2]

To date, the Board of Directors does not have a formalised process with clearly defined roles and responsibilities for sustainability oversight. Nevertheless, an **informal governance mechanism** is in place, with the Chief Operating Officer (COO) taking ownership of these matters. The COO provides regular updates to both the BoD and the Executive team on the progress of sustainability initiatives and key deliverables, including the Double Materiality Assessment (DMA). The Board of Directors is involved on an as-needed basis for key approval steps and strategic choices, ensuring the oversight and validation of these activities.

During the reporting period, the Board of Directors has been notified about the set of material impacts, risks, and opportunities identified through the double materiality assessment. These include:

- **environmental matters**, related to resource efficiency, GHG emissions, and pollution;
- **social matters**, related to employees, value chain workers, consumers and end-users; and
- **governance matters**, related to business ethics.

1.2.3 Integration of sustainability-related performance in incentive schemes

[GOV-3]

Nactarome has **not implemented incentive systems or remuneration policies tied to sustainability targets** for its administrative, management, and supervisory bodies. Nonetheless, performance incentives related to sustainability have been introduced in specific departments, such as procurement. In this area, bonus schemes are partly linked to the successful completion of a dedicated sustainable procurement project.

1.2.4 Statement on due diligence

[GOV-4]

Recognizing the importance of **due diligence**, Nactarome is committed to progressively enhancing its control over the **negative impacts** identified within its business activities and across its value chain as a result of the double materiality assessment.

As part of its due diligence process, the Company carries out ongoing monitoring of environmental and social impacts related to its **supply chain**, including responsible procurement practices, traceability of raw materials, and compliance with quality and safety requirements. Nactarome has defined policies and procedures to address potential adverse impacts, supported by reporting and escalation channels, such as the Code of Ethics and whistleblowing mechanism.

Core elements of due diligence	Paragraphs in the Sustainability Statement
a) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-1 ESRS 2 GOV-2 ESRS 2 SBM-3
b) Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 IRO-1 ESRS 2 – SBM-2
c) Identifying and assessing adverse impacts	ESRS 2 – IRO-1
d) Taking actions to address those adverse impacts	ESRS E1-3 ESRS E3-2 ESRS E5-2 ESRS S1-3 ESRS S2-3 ESRS S4-3
e) Tracking the effectiveness of these efforts and communicating	ESRS E1-4 ESRS E3-3 ESRS E5-3 ESRS S1-5 ESRS S4-5

1.2.5 Risk management and internal controls over sustainability reporting

[GOV-5]

For the 2024 reporting cycle, Nactarome has formalised a **structured internal control system** for the preparation of sustainability information. The process was coordinated by designated Data Collection Responsibles, who acted as focal points for each legal entity within the Company. These individuals distributed detailed data collection guidelines and a reporting package consisting of a Word template for qualitative information and an Excel template for quantitative data.

The reporting package was assigned to internal functions according to their specific competencies (e.g., environment, human resources, health and safety, procurement, governance). Each function was responsible for compiling the requested information and returning the completed files to the appointed **Data Collection Responsibles**. Upon receipt, the Data Collection Responsibles performed a review of the submitted data, ensuring internal consistency, completeness, and adherence to the defined reporting guidelines. Only after this validation phase were the data consolidated and processed for inclusion in the Sustainability Statement.

This structured process reflects Nactarome's commitment to progressively strengthen the robustness, reliability, and traceability of its sustainability reporting. The Company has established an internal framework that facilitates clear responsibilities and enhances data quality. In the coming years, Nactarome intends to further improve its **internal control mechanisms**, also considering the introduction of digital solutions for ESG data management.

1.3 Strategy

1.3.1 Strategy, business model and value chain

[SBM-1]

Nactarome is a leader in the creation and production of **natural flavours, taste ingredients, and colour solutions for the food & beverage industry**. All flavours & extracts come in liquid, powder, and paste form for a maximum versatility across products. The Company has **over 550 employees across 9 countries** who leverage global expertise, local presence, and vertical integration to offer high quality, innovative solutions tailored to meet customer preferences. The Company collaborates closely with its clients across all stages of products developments and stands out for extraordinary service and quality thanks to the adoption of the latest technologies, attention to consumer trends, and detailed market insights that drive successful production and win over customers.

Nactarome is **active in more than 100 countries**, supported by **17 R&D and production sites**. Its customer-centric model is built on acting as an extension of clients' product development teams, supporting diverse food & beverage manufacturers.

Key customer groups include **B2B food producers** across Europe and beyond, and also **retail and food service customers** requiring natural flavours, taste, colour solutions, and specialty ingredients. The Company also serves customers with specific dietary or religious needs (e.g., vegan, *Halal*, *Kosher*, Organic, clean label).

As part of its sustainability strategy, Nactarome adopts a proactive approach aimed not only at continuously improving its own environmental performance but also at enhancing compliance across the Company's industrial network.

Nactarome's **sustainability approach** includes the acquisition of family-owned or small-scale companies that often have limited resources to effectively manage environmental, social, and governance (ESG) aspects. Through these acquisitions, the Company leverages synergies and its broader capabilities to ensure full alignment with sustainability standards and accelerate the organic growth of the acquired companies.

This process involves targeted investments to upgrade production facilities, enhance energy efficiency, and strengthen ESG management practices, thereby fostering the transition of newly integrated companies toward growing, profitable, sustainable, and compliant operations. Moreover, the achievement of several operational targets has resulted in positive ESG outcomes. Notably, the progressive closure of synthesis activities at AromataGroup's Gessate site has contributed to mitigating environmental risks and reducing the company's overall environmental footprint.

Nactarome operates through a **customer-focused business model** that positions the Company as an extension of its clients' product development teams, delivering a comprehensive portfolio of natural flavour, taste, ingredients, and colour solutions. Its activities span a wide range of applications in the sweet, savoury, and beverage segments, with a strong emphasis on health-conscious, sustainable, and clean-label products. Fully equipped laboratories and kitchens — staffed by technologists, chefs, quality and regulatory experts, and sensory specialists — enable the Company to

transform market trends and technological advances into innovative, high-quality solutions.

The Company's **inputs** include agricultural raw materials (such as flour, sugar, coffee, vanilla, dairy products, juices, and herbs), natural and synthetic colours, alcohols, proteins, and packaging materials (plastic, paper, and metal). These are sourced from a **diverse network of suppliers** across Europe, Africa, Asia, and the Americas. Beyond raw materials, Nactarome relies on equipment, logistics, cleaning, IT, and maintenance services to sustain its operations. Supplier relationships are managed with a strong focus on quality, efficiency, traceability, and sustainability, ensuring that procurement practices align with both business needs and environmental and social standards.

The Company's **outputs** include a broad array of flavours (liquid, powder, spray-dry), botanical extracts, coatings and breeding systems, natural and synthetic colours, hydrolysed vegetable proteins, and other food ingredients. These outputs generate outcomes in the form of innovative, high-quality, sustainable, and clean-label solutions, helping clients meet evolving consumer demand for healthier and more natural products. For investors, the Company's outputs contribute to long-term growth and value creation, while for stakeholders they support wider sustainability objectives, such as reducing environmental impact and promoting responsible sourcing.

Nactarome holds a central position in its value chain, acting as a strategic link between upstream suppliers and downstream customers.

- **Upstream:** global suppliers provide agricultural raw materials, chemical ingredients, packaging, logistics, and services.
- **Own operations:** the Company runs 17 R&D and production sites across Europe, where product development, testing, and manufacturing take place.
- **Downstream:** its solutions are distributed through B2B channels to food, beverage, nutraceutical, and cosmetics companies worldwide, supported by logistics partners. End-users ultimately benefit from the incorporation of Nactarome's solutions into consumer products, while waste management and recycling partners complete the chain.

Through this structure, Nactarome positions itself not only as a supplier of taste, colour, and ingredient solutions, but also as a strategic innovation partner, enabling sustainable growth across its value chain.

1.3.2 Interests and views of stakeholders

[SBM-2]

For 2024 reporting, Nactarome updated its double materiality assessment using a process aligned with the **ESRS** and the **EFRAG Implementation Guidance**. The assessment considered both impact materiality (the Company's actual and potential effects on people and the environment) and financial materiality (sustainability-related risks and opportunities with potential financial effects on Nactarome).

Stakeholder engagement played a central role. Internal representatives from different functions — such as operations, quality, regulatory affairs, health and safety, human resources, and procurement — were directly involved in structured interviews and questionnaires. They assessed the scale, scope, severity, and likelihood of potential impacts, as well as the magnitude and probability of sustainability-related risks.

The outcome of this updated process was the identification and prioritisation of **material impacts, risks, and opportunities (IROs)** across environmental, social, and governance topics, structured according to ESRS topical standards and sub-topics. This approach ensures that Nactarome's 2024 Sustainability Statement reflects not only regulatory expectations but also the views and interests of stakeholders, thereby strengthening the alignment between the Company's strategy and the societal and environmental context in which it operates.

Looking ahead, Nactarome will continue to refine its stakeholder engagement practices, integrating both qualitative insights and quantitative indicators (policies, actions, metrics, and targets) to ensure transparent and forward-looking sustainability reporting in preparation for full CSRD compliance by 2027.

1.3.3 Material impacts, risks and opportunities and their interaction with strategy and business model

[SBM-3]

The 2024 double materiality assessment enabled Nactarome to identify and prioritize its most significant sustainability IROs, in line with the requirements of the ESRS. This process highlighted how sustainability matters directly interact with and influence the Company's **strategy and business model**.

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
E1 Climate change	Climate change mitigation		Generation of indirect (Scope 3) GHG emission (e.g., transport and distribution, production of goods) from the value chain	Increased costs related to the transition from non-renewable energy to renewable energy	
E1 Climate change	Energy			Higher operational costs due to energy price volatility resulting from exogenous events (e.g. wars, pandemics)	
E2 Pollution	Pollution of water		Release of hazardous and/or toxic substances into water in the		

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
			upstream supply chain beyond legal limits (e.g. goods and transport)		
E3 Water and marine resources	Water	Water discharges		Sanctions due to violations and non-compliance with water discharge regulations	
E5 Resource use and circular economy	Resources inflows, including resource use			Production disruptions, volatility costs or loss of competitiveness due to challenges in sourcing essential ingredients (e.g. scarcity, extreme weather events, geopolitical tensions)	
S1 Own workforce	Working conditions	Secure employment	Economic security of employees through permanent employment contracts		
S1 Own workforce	Working conditions	Working time	Employee satisfaction with working hours		
S1 Own workforce	Working conditions	Adequate wages	Economic security of workers due to alignment of compensation and incentive policies with the market		
S1 Own workforce	Working conditions	Health and safety	Improvement of employees' physical and mental well-being through health support tools and services, such as additional health insurance	Reputational damage due to workplace accidents involving employees	
S1 Own workforce	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	Discrimination against female employees in accessing top positions and/or		

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
			career development opportunities		
S1 Own workforce	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	Gender pay gap for equal work		
S1 Own workforce	Equal treatment and opportunities for all	Training and skills development	Development of employee skills and capabilities through training and professional development programmes		
S1 Own workforce	Other work-related rights	Privacy	Violation of employees' right to privacy due to data leakage and/or data loss		
S2 Workers in the value chain	Working conditions	<ul style="list-style-type: none"> - Secure employment - Working time - Adequate housing - Social dialogue - Freedom of association, the existence of works councils and the information, consultation and participation rights of workers - Collective bargaining, including rate of workers covered by collective agreements - Work-life balance 	Violation of labour-related rights of workers in the value chain		
S4 Consumers and end-users	Information-related impacts for consumers and/or end-users	Privacy	Violation of consumer privacy rights due to data leakage and/or data loss		
S4 Consumers and end-users	Personal safety of consumers and/or end-users	<ul style="list-style-type: none"> - Health and safety - Security of a person 	Protection of customer health and safety through compliance with food quality standards	Sanctions and reputational damage due to non-compliance of products with hygiene and food safety	

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
				regulations (e.g. HACCP)	
S4 Consumers and end-users	Social inclusion of consumers and/or end-users	Non-discrimination	Access to products and services for all customer categories (with religious constraints, vegetarians, vegans)		
G1 Business conduct	Corporate culture		Promotion of fairness and ethical values among employees and toward the market		
G1 Business conduct	Corruption and bribery	Prevention and detection including training	Growth in awareness and dissemination of a culture of ethics and anti-corruption among management, employees, business partners, and other stakeholders		

1.4 Impact, risk and opportunity management

1.4.1 Description of the processes to identify and assess material impacts, risks and opportunities

[IRO-1]

In 2024, Nactarome updated its double materiality assessment (DMA) in line with the European Sustainability Reporting Standards (ESRS) and the EFRAG Implementation Guidance on materiality. The process was designed to systematically identify and assess the Company's material impacts, risks, and opportunities (IROs) across its operations and value chain.

The assessment followed two complementary perspectives:

- **Impact materiality (inside-out):** analysis of Nactarome's actual and potential, positive and negative effects on people, communities, and the environment. This included impacts caused or contributed to by the Company, as well as those directly linked to its activities, products, or services through business relationships. Impacts were evaluated using parameters such as **scale, scope, likelihood**, and **irremediability**.
- **Financial materiality (outside-in):** analysis of sustainability-related risks and opportunities that may have or could reasonably be expected to have significant financial effects on the Company. Risks were assessed on the basis of **likelihood** and **potential magnitude**, while opportunities were evaluated according to their potential to enhance resilience, competitiveness, and long-term value creation.

Methodological approach

A preliminary review of the regulatory framework was conducted, with particular attention to the CSRD provisions and ESRS requirements, alongside an internal analysis of existing documentation, such as a business plan and a financial statement. In parallel, the analysis of existing sector-specific benchmarks by public sources and databases (e.g. UNEP FI, MSCI, SASB) was carried out to identify commonly reported material topics. The reporting boundary was defined starting from the consolidated financial statements, and the value chain was mapped in line with EFRAG IC 2 – Value Chain guidance, in order to identify material IROs along the entire supply chain.

A **long list** of impacts, risks and opportunities (IROs) across the value chain was developed and classified according to ESRS topics, sub-topics and sub-sub-topics. This list, further informed by the context analysis, served as the basis for the double materiality assessment and the identification of the most material IROs;

The process involved **internal stakeholders** from key functions (operations, quality, regulatory affairs, health and safety, HR, procurement, sustainability) who were engaged through structured interviews and questionnaires. Each function provided input according to its area of expertise, ensuring a comprehensive mapping of impacts and risks across all ESRS topical standards and sub-topics.

The assessment relied on the use of **appropriate quantitative and/or qualitative thresholds**, which are essential to determine which impacts, risks and opportunities are

to be considered material and, consequently, which sustainability matters must be addressed and reported by the undertaking.

A numerical score was assigned to each criterion, then normalised into an overall score for each IRO. For impacts, a materiality threshold of 3.5 (on a scale from 1 to 5) was applied, resulting in the identification of **16 material impacts**. For risks a threshold of 2.5 (on a scale from 1 to 5) was applied, leading to the identification of **6 material risks**.

The results of the impact and financial materiality assessments were consolidated to identify topics that are material from an impact perspective, a financial perspective, or both. A sustainability matter was deemed material if at least one impact, risk or opportunity was above the materiality threshold, indicating either impact materiality, financial materiality, or both. Non-material sustainability matters were those where no IRO was identified and/or all impacts, risks and opportunities were scored below the threshold.

The outcome of the assessment was reviewed by Management and key corporate functions, leading to the final definition of material ESG matters to be included in the Sustainability Statement.

Environmental Information

2. ESRS E1 Climate change

2.1 Impact, risk and opportunity management

[IRO-1]

Nactarome identifies climate change as a key environmental matter affecting both its operations and value chain. The Company manages climate-related impacts, risks, and opportunities through structured processes integrated within its environmental and energy management systems. The approach focuses on improving energy efficiency, optimizing production processes, and progressively increasing the share of renewable energy in its energy mix. Actions and investments are planned across several entities to modernize facilities, upgrade equipment, and reduce greenhouse gas emissions, ensuring compliance with international standards. These initiatives contribute to operational resilience, long-term cost savings, and alignment with global climate objectives.

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
E1 Climate change	Climate change mitigation		Generation of indirect (Scope 3) GHG emission (e.g., transport and distribution, production of goods) from the value chain	Increased costs related to the transition from non-renewable energy to renewable energy	
E1 Climate change	Energy			Higher operational costs due to energy price volatility resulting from exogenous events (e.g. wars, pandemics)	

2.1.1 Policies

[E1-2]

The Nactarome legal entities demonstrate their commitment to climate action through **environmental policies** and **certified management systems**. AromataGroup, Calaf Nuances, Nactis Flavours, Nactarome NV, and Royal Buisman have adopted policies promoting pollution prevention, efficient resource use, and continuous improvement, often aligned with *ISO 14001* principles. These policies cover all operational activities and, where relevant, extend to suppliers, encouraging them to minimize environmental impacts. Implementation is supported by annual programmes, performance indicators, internal audits, management reviews, and employee training. For entities without a dedicated climate policy, such as IPAM and Nactarome Ltd, sustainability practices,

responsible sourcing, and compliance with international certifications help mitigate environmental impacts and improve resource efficiency.

AromataGroup

Environmental Policy

AromataGroup has adopted an *Environmental Policy* that defines the general objectives of mitigating and preventing sources of pollution and continuously improving environmental performance. This commitment is implemented through an **Environmental Management System (EMS)** compliant with the *ISO 14001* standard for the Gessate site. The policy commits the company to protect and safeguard the environment, addressing the environmental risks related to its operations by identifying, assessing, and mitigating potential impacts at every decision-making and operational stage. In case of emergencies, the company adopts technological and managerial measures for prevention and effective response.

The achievement of the objectives and the monitoring of policy effectiveness are ensured through structured tools such as:

- the **annual environmental programme**;
- the **analysis of environmental performance indicators** (KPIs);
- **internal audits** and the management of non-conformities;
- the **Management Review**, aimed at ensuring the continuous improvement of the system.

The Environmental Policy covers all AromataGroup's core business activities and extends to the **upstream supply chain**, by promoting supplier awareness and engagement within the Environmental Management System. The company also commits to informing, training, and raising awareness among its **employees**, while maintaining an **open dialogue with local communities and environmental authorities**, thereby strengthening its role as a responsible and transparent stakeholder.

The ultimate responsibility for implementing the Environmental Policy lies with the **Chief Executive Officer (CEO)**, who ensures its alignment with the company's strategic objectives and the applicable regulatory framework.

Finally, AromataGroup makes its Environmental Policy **publicly available** on the company's website, ensuring accessibility for all stakeholders involved or potentially affected.

IPAM

Although IPAM does not have a dedicated climate policy, its commitment to sustainability and responsible resource management is reflected in its **operational practices** and **procurement approach**. The company promotes efficiency and traceability across its supply chain, favouring suppliers who integrate environmental and social responsibility into their activities. These practices contribute indirectly to

mitigating environmental impacts and support IPAM's broader effort to align business operations with sustainability and climate-resilient principles.

Starting in 2025, IPAM and AromataGroup will merge to form Nactarome S.r.l., extending AromataGroup's sustainability and climate-related policies to IPAM and ensuring alignment of environmental practices across the newly consolidated entity.

Calaf Nuances

ISO 14001

Calaf Nuances has adopted an **Environmental Management System (EMS)** certified according to *ISO 14001*, which establishes a structured and systematic approach to managing the company's environmental responsibilities. The policy aims to balance economic performance with environmental protection by promoting continuous improvement, pollution prevention, and compliance with applicable regulations. The EMS follows the **Plan-Do-Check-Act** cycle to ensure ongoing monitoring and enhancement of environmental performance, from setting measurable objectives and implementing processes to evaluating progress and introducing corrective actions.

The policy covers **all company activities** related to product development and manufacturing, with application across the organisation's operations. The **Management of Calaf Nuances** assumes full responsibility for achieving the established environmental goals and provides the necessary resources to ensure compliance and improvement.

In implementing *ISO 14001*, Calaf Nuances undertakes to comply with **relevant European, national, and local environmental regulations**, covering areas such as water use and discharge, atmospheric emissions, waste management, noise and light pollution, industrial safety, and the handling of hazardous substances.

Stakeholders' interests are integrated through transparent communication and participation: the environmental policy is developed and approved at the **highest management level**, shared with employees and relevant stakeholders, and reviewed periodically to ensure its effectiveness. The policy is **publicly available** on the company's website and can also be provided electronically upon request.

Nactis Flavours

Nactis Flavours demonstrates its commitment to combating climate change through its *Quality, Health, Safety, Environment & Corporate Social Responsibility Policy*², which integrates **environmental management principles** into daily operations. The policy defines that in every industrial decision, Nactis Flavours systematically evaluates the best available solutions to **reduce its environmental footprint**. In addition, it promotes the efficient use of resources, reduction of waste, and the continuous improvement of environmental performance across all production processes. To operationalize these commitments, Nactis Flavours has implemented an **environmental management system** across all its sites, with the Yssingeaux facility maintaining *ISO 14001* certification. The company also identifies and manages **significant environmental aspects** and

² For further information about the policy, please see § Policies in Chapter ESRS S4 Consumers and end-users.

evaluates climate-related risks and opportunities to enhance operational resilience and adaptive capacity. Complementing this framework, the company's *Supplier Code of Ethics*³ extends these commitments throughout the **supply chain**, requiring business partners to assess and reduce their environmental impacts, limit emissions, and adopt sustainable production practices. Together, these instruments ensure that environmental responsibility and climate considerations are embedded in both operational and procurement activities.

Nactarome NV

Environmental Policy

Nactarome NV has adopted an *Environmental Policy* that reflects its commitment to **minimizing the environmental impacts of its operations**. The company strives to prevent pollution, reduce waste, and limit resource consumption, applying a principle of continuous improvement to measurable parameters such as utility use and waste streams. The policy covers all activities, from **production processes to associated services** such as commuter traffic, ensuring that environmental considerations are embedded across the organisation. **Local directors** are accountable for its implementation, supported by **top management**, which promotes a culture in which attention to environmental protection is integral to everyday practices and business decisions.

Royal Buisman

Environmental Policy

Royal Buisman's *Environmental Policy* formalizes the company's commitment to reducing its environmental and climate footprint through continuous improvement. The policy sets out clear **objectives**: minimizing waste streams and pollution, reducing greenhouse gas emissions from gas use and energy consumption, and integrating environmental goals into corporate identity and daily operations. It applies to **all company activities and employees**, with no exclusions, and is overseen by the **Management Team**, which is accountable for its implementation and performance.

Progress is regularly reviewed against objectives through **internal monitoring** and **staff training**, ensuring awareness and engagement at all organisational levels. Although the policy does not explicitly reference external frameworks, its structure and emphasis on pollution prevention, performance monitoring, and continual improvement align closely with *ISO 14001* principles and recognised environmental management practices. The policy also reflects stakeholder expectations by committing to act as "a reliable partner dedicated to environmental care and a sustainable society," demonstrating responsiveness to customers and society. Distributed internally as a controlled document and used for employee education, it anchors **environmental management** in Royal Buisman's daily practice.

³ For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

Nactarome Ltd

Although Nactarome Ltd has not yet established a dedicated climate policy, its broader sustainability practices reflect a strong awareness of environmental responsibility. In 2023, the company partnered with **Carbon Neutral Britain** to measure its total carbon footprint, aiming to **offset all greenhouse gas (GHG) emissions** and reach **carbon neutrality**. The methodology used by Carbon Neutral Britain aligns with **ISO 14064** and the **GHG Protocol** standards. Nactarome Ltd operates under rigorous international certifications — including *FSSC 22000*, *BRC Grade A*, *Halal*, and *Kosher*⁴ — which promote the efficient management of resources and continuous improvement in production processes. Furthermore, through its *Modern Anti-Slavery* and *Child Labour Policies*⁵, Nactarome Ltd extends its ethical and responsible sourcing approach to suppliers, encouraging transparency and sustainable practices across the value chain. These measures, taken together, contribute to reducing indirect environmental impacts and align the company's operations with long-term climate resilience and sustainability goals.

2.1.2 Actions and targets

[E1-3] [E1-4]

Across the Nactarome companies, several initiatives are underway to **improve energy efficiency, reduce greenhouse gas emissions, and minimize environmental impact** in line with the Company's broader sustainability strategy. Each legal entity has implemented concrete measures adapted to its operational context, focusing on optimizing production processes, enhancing energy performance, and adopting cleaner technologies. Actions include site modernisation projects, process optimisation, energy monitoring, and the gradual integration of renewable energy sources. The companies also continuously improve production planning by grouping compatible batches to minimize cleaning operations, thereby reducing water, energy, and fuel consumption. Similar optimisation efforts are applied to logistics and procurement: shipments are grouped to reduce GHG emissions, while purchase orders are consolidated through annual contracts and local sourcing to minimize transport-related impacts. These initiatives not only contribute to environmental protection, but also strengthen operational resilience, reduce costs, and support long-term climate objectives. The actions are implemented progressively, with clear timelines and regular monitoring to ensure continuous improvement and alignment with stakeholder expectations.

AromataGroup

In 2024, AromataGroup continued its efforts to reduce environmental risk and enhance operational efficiency through the **relocation of production activities from the**

⁴ For further information about the certifications, please see § Policies in Chapter ESRS S4 Consumers and end-users.

⁵ For further information about the policies, please see § Policies in Chapter ESRS S2 Workers in the value chain.

Vanzago and Gessate sites to the new Concorezzo facility. This strategic project, extending across 2025 and 2026, aims to consolidate production in a single, modern plant equipped with advanced safety, environmental monitoring, and energy efficiency systems. The initiative contributes to minimizing environmental impact, improving process control, and ensuring compliance with the latest environmental and occupational safety standards. The transfer of activities from Vanzago will be completed in 2025, while the relocation of the Gessate site is scheduled for completion in 2026. Once fully implemented, this consolidation will support AromataGroup's broader sustainability objectives by optimizing resource use and reducing emissions related to logistics and site management.

Calaf Nuances

Calaf Nuances implements a comprehensive set of actions aimed at reducing its environmental footprint and optimizing resource use across its operations. During 2024, several **training sessions** have been provided to employees on good manufacturing practices, emergency management, waste regulation updates, and internal non-conformity reviews, strengthening environmental awareness and operational efficiency. Calaf Nuances maintains *ISO 14001* certification, ensuring **systematic environmental management** and **continuous monitoring** of consumption, emissions, and waste generation. These actions are implemented on an ongoing basis throughout the company, with annual review and improvement cycles.

Calaf Nuances has set several operational targets under its *Quality, Environmental and Food Safety Policy* aimed at improving energy efficiency and reducing greenhouse gas emissions. The company is progressively replacing all lighting with **LED technology**, targeting 100% replacement within ten years from 2017; as of 2024, 68% of the goal has been achieved. In parallel, Calaf Nuances plans to generate between 40–50% of its total energy consumption through **solar panels**, corresponding to approximately 84,000 kW. The project is currently under budget evaluation (2023–2024), with installation expected in 2026 and final assessment in 2027. Additional initiatives include the installation of **more efficient machinery** — notably a new vibrating sieve (K-600 LLEAL) — to reduce electricity consumption and emissions while improving worker safety. Furthermore, the ongoing *Production Room Project* aims to improve energy performance and air quality through upgraded panels, ventilation, and emission treatment systems, with completion planned for 2026–2027.

Nactarome NV

Nactarome NV has implemented a series of initiatives aimed at improving energy efficiency and reducing greenhouse gas emissions across its operations. Recent actions include the **installation of solar panels** to generate renewable electricity on-site and the **electrification of the company car fleet**, both to be completed in 2025. In addition, the **insulation of the warehouse roof**, finalised in 2024, has contributed to lowering the energy demand for heating and cooling. Ongoing projects include the **insulation of hot**

water pipes in the production and administration areas, scheduled for completion by 2026, which will help minimize heat loss and optimize energy consumption. Furthermore, the company is conducting a **study on an alternative filtration technique** for hydrolysed vegetable protein (HVP) production, designed to reduce energy use during processing. This project is expected to be completed by 2026 and reflects Nactarome NV's continuous effort to integrate innovative and energy-efficient solutions in its production systems.

Royal Buisman

Royal Buisman has launched a structured programme to reduce **gas consumption per kilogram of end product**, with the goal of improving energy efficiency and reducing greenhouse gas emissions from production activities at its Zwartsluis site. The initiative, aligned with the company's broader **environmental roadmap**, follows a phased approach: planning activities were completed in 2024, pilot testing (FAT/SAT) will begin in 2025, and full implementation is expected by 2026. These actions aim to optimize process heating systems and insulation, reduce energy intensity, and contribute to the company's climate mitigation objectives.

2.2 Metrics

2.2.1 Energy consumption and mix

In the two-year period 2023-2024, Nactarome's **total energy consumption increased by approximately 3%** compared with the **4% increase in production volumes**, which went from 49,966 tons in 2023 to 51,878 tons in 2024. The energy mix remained predominantly non-renewable, with fossil fuels accounting for 81% of total energy consumption in 2023 and 78% in 2024.

Renewable fuels, including biomass, are currently not used in core operations, whereas in 2023 21% of the energy purchased from third parties originated from renewable sources, share that increased to 28% in 2024. Limited on-site renewable electricity generation is in place through **photovoltaic systems** operated by AromataGroup at its Gessate and Concorezzo sites in Italy. These systems contribute to on-site electricity production and support the reduction of fossil fuel use and related GHG emissions.

Natural gas continued to be the main non-renewable energy source, representing around 96% of non-renewable energy use in both years. It is primarily used for heating and production processes in IPAM.

In 2024, despite the increase in total energy consumption, **gasoline use declined** significantly by 67%, mainly due to lower consumption by AromataGroup and IPAM. This reduction was partially offset by an increase in diesel consumption of around 70%.

The **increase in LPG use**, from 0 to 13.52 MWh, is linked to Nactarome Ltd, which uses LPG to heat process water in cleaning operations. LPG is stored in a large on-site tank that is refilled only occasionally, when necessary. No refills were recorded in 2023, while one refill occurred in 2024, which explains the variation between the two years. For Nactarome Ltd's company fleet, gasoline consumption increased due to the introduction of petrol-hybrid vehicles for employees with higher business travel mileage. This shift contributed to a corresponding decrease in diesel consumption. The reduction in LPG use for vehicles reflects a lower use of gas-powered forklifts and a greater deployment of electric forklifts.

Gasoline use at Nactis Flavours increased between 2023 and 2024 as a result of a more comprehensive data collection approach: in 2024, reporting also included personal card payments and private vehicle mileage reimbursements, in addition to the previously reported DKV card transactions.

Energy consumption from non-renewable fuels remained stable between the two years for Calaf Nuances, Royal Buisman, and Nactarome NV.

Electricity consumption totaled 10,233.39 MWh in 2023 and 11,920.43 MWh in 2024, reflecting a year-on-year **increase of about 17%**.

The increase in electricity consumption in 2024 is primarily associated with AromataGroup, which recorded a 48% rise due to the significant expansion of the Concorezzo site, including the installation of additional process equipment, such as a distillation unit and a spray dryer, ahead of the closure of the Vanzago plant in 2025 and the Gessate site in 2026. This increase was partially offset by the closure of the Bresso site. Nactarome Ltd reported a 7% increase in electricity consumption linked to the addition

of a new warehouse unit, whereas Calaf Nuances achieved a 7% reduction due to targeted energy efficiency measures.

Except for AromataGroup and IPAM, all entities within Nactarome reported purchase of electricity from nuclear sources. For Royal Buisman and Nactarome Ltd, nuclear-based electricity consumption is recorded starting in 2024, reflecting the change in their electricity supply mix.

Overall, total energy consumption increased slightly year-on-year. However, the Company improved its share of renewable electricity and continues to implement measures to enhance energy efficiency across its sites and further increase the contribution of renewable sources within the energy mix.

[E1-5]

Energy Consumption (MWh)	2023	2024
Total consumption of non-renewable fuels	42,956.96	43,044.96
	81%	78%
Coal	0.00	0.00
Gasoline	1,014.51	338.38
<i>for company fleet (business use vehicles)</i>	990.00	299.89
<i>for company fleet (mixed-use vehicles)</i>	24.51	38.49
LPG	0.08	13.53
<i>for company fleet (mixed-use vehicles)</i>	0.08	0.00
<i>for other purposes</i>	0.00	13.52
Natural gas	41,381.71	41,737.27
<i>for heating</i>	4,764.53	5,335.04
<i>for other purposes</i>	36,617.17	36,402.23
Diesel	560.67	955.79
<i>for heating</i>	187.41	186.87
<i>for company fleet (business use vehicles)</i>	310.75	754.44
<i>for company fleet (mixed-use vehicles)</i>	62.51	14.47
Total consumption of renewable fuels	0.00	0.00
	0%	0%
Biomass (including the organic part of waste fuels)	0.00	0.00
Total consumption of electricity	10,233.39	11,920.43
	19%	22%
Purchase of electricity	9,846.85	11,540.28
<i>of which from renewable sources - From third parties</i>	2,076.71	3,265.36
<i>of which from non-renewable sources - From third parties</i>	4,771.37	4,693.63
<i>of which from nuclear sources - From third parties</i>	2,998.77	3,581.29
	6%	6%
Self-generation of electricity	386.55	380.15
<i>of which produced by solar photovoltaic plants</i>	386.55	380.15
Total energy consumption	53,190.36	54,965.39

2.2.2 Gross Scopes 1 and 2 and Total GHG emissions

Nactarome aims to reduce greenhouse gas (GHG) emissions and to mitigate climate change across its operations. In 2024, GHG emissions followed a trend consistent with the Company's overall energy consumption. **Scope 1 emissions** did not record any material increase compared to 2023 and **remained essentially stable year-on-year**, with a minimal variation of 0.4% that does not reflect structural changes in operations. 2024 **Scope 2 location-based emissions increased slightly by 17%** compared to the previous year. These variations mainly reflect operational growth and changes in energy needs across specific sites.

Despite this modest increase, Nactarome continues to implement targeted actions aimed at reducing its carbon footprint in line with local and international environmental standards. Each entity within the Company contributes through tailored improvement projects, reinforcing Nactarome's long-term commitment to environmental stewardship and to supporting global efforts in the fight against climate change.

[E1-6]

Total GHG emissions (tCO ₂ e)	2023	2024
Direct GHG emission (Scope 1)	8,656.82	8,689.33
Gasoline	166.15	55.05
LPG	0.01	2.18
Natural gas	8,390.92	8,462.13
Diesel	99.74	169.97
Energy indirect GHG emissions (Scope 2-Market Based)	2,341.71	2,360.57
Energy indirect GHG emissions (Scope 2-Location Based)	2,185.72	2,570.94
Total GHG emissions (Market Based)	10,998.53	11,049.90
Total GHG emissions (Location Based)	10,842.54	11,260.27

3. ESRS E2 Pollution

3.1 Impact, risk and opportunity management

[IRO-1]

Nactarome addresses pollution prevention as part of its broader environmental management framework, encompassing air, water, and soil protection. The legal entities integrate pollution control into certified management systems and internal procedures aimed at minimizing emissions, reducing waste, and ensuring responsible handling of chemicals and effluents. Regular monitoring, maintenance of emission control systems, and compliance with environmental permits underpin pollution prevention and mitigation efforts. During the reporting period, all entities operated in compliance with applicable regulations, and no pollution-related incidents or non-conformities were recorded.

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
E2 Pollution	Pollution of water		Release of hazardous and/or toxic substances into water in the upstream supply chain beyond legal limits (e.g. goods and transport)		

3.1.1 Policies

[E2-1]

The Nactarome legal entities approach pollution prevention through **broader environmental, quality, and sustainability frameworks**. AromataGroup, Calaf Nuances, Nactis Flavours, and Nactarome NV embed commitments to minimize environmental impacts — including emissions, waste, and resource use — within their *Environmental Policies*, *ISO 14001*-based management systems, or broader *Quality, Health, Safety, Environment & Corporate Social Responsibility Policies*⁶. These frameworks promote continuous improvement, responsible chemical handling, and efficient resource use, often complemented by supplier engagement and internal monitoring. Royal Buisman has implemented a dedicated Emergency Plan to manage pollution risks from hazardous spills and leaks. For entities without a dedicated environmental policy, such as IPAM and Nactarome Ltd, compliance with stringent quality, safety, and ethical sourcing standards indirectly supports pollution prevention and ensures that environmental considerations are incorporated across operations and the supply chain.

⁶ For further information about the policies, please see § Policies in Chapter ESRS E1 Climate change.

AromataGroup

AromataGroup contributes to pollution prevention through its **integrated management of quality, safety, and environmental performance**. The company applies rigorous standards in production processes to minimize emissions and waste, while promoting efficient use of resources and responsible chemical management. Environmental protection is also embedded in the *Code of Ethics*⁷ and in supplier evaluation practices, ensuring that partners comply with applicable environmental regulations and share the company's commitment to reducing operational impacts on air, water, and soil quality.

IPAM

Although IPAM has not established a specific policy on pollution, the company's operations reflect a **proactive approach to environmental responsibility**. Its procedures for workplace safety, product quality, and compliance contribute to minimizing pollutants and ensuring responsible use of substances in production. Through careful selection of raw materials and suppliers that adhere to ethical and environmental standards, IPAM helps prevent contamination risks and supports cleaner, safer production environments.

Calaf Nuances

Calaf Nuances integrates pollution prevention into its broader **environmental and quality management approach**. The company prioritizes the responsible handling of raw materials and waste, in line with internal health and safety procedures and the overarching Nactarome's ethical standards. Continuous improvement in production efficiency and strict adherence to environmental regulations help ensure that operations are conducted with minimal impact on air, water, and soil.

Nactis Flavours

Nactis Flavours addresses pollution prevention through its **Quality, Health, Safety, Environment & Corporate Social Responsibility Policy**⁸, which sets clear principles for reducing emissions, managing waste, and preventing contamination. The policy promotes continuous improvement in environmental performance, supported by internal audits and employee awareness initiatives. In addition, the *Supplier Code of Ethics*⁹ reinforces these principles by requiring suppliers to adopt environmentally responsible practices and comply with all applicable environmental regulations.

Nactarome NV

Nactarome NV integrates pollution prevention into its overall **commitment to responsible operations and environmental compliance**. The company applies stringent quality and safety standards in its production activities, ensuring proper

⁷ For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

⁸ For further information about the policy, please see § Policies in Chapter ESRS S4 Consumers and end-users.

⁹ For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

handling and disposal of raw materials and waste. Through alignment with the overarching Nactarome's ethical and environmental principles, Nactarome NV promotes the use of cleaner processes and the reduction of potential emissions and contaminants, safeguarding both workplace safety and the surrounding environment.

Royal Buisman

Emergency Plan

Royal Buisman manages pollution risks through its comprehensive *Bedrijfsnoodplan* (i.e., *Emergency Plan*), which defines the **organisation, roles, and actions** to be taken in the event of **hazardous liquid spills or leaks**. The plan's main objective is to protect human health and prevent pollutants from entering drains or surface water through containment, evacuation, and coordination with authorities. It applies to **all on-site areas**, including production, utilities, and storage, and is implemented under the leadership of the **Head BHV** / Preventiemedewerker, with overall accountability held by the **Managing Director** as chair of the crisis team.

The plan references the Arbowet Art. 15, Wet Milieubeheer, Wet Verontreiniging Oppervlaktewateren and BRZO/ARIE guidelines, aligning it with **Dutch environmental and occupational-safety legislation**. Developed in consultation with the local fire brigade and water authorities, it protects employees, neighbouring communities, and the environment. The full plan is stored on site and shared with emergency services, while summaries and emergency contact details are visibly posted across the facility. Annual drills and incident reviews are conducted to evaluate and improve effectiveness.

Nactarome Ltd

While Nactarome Ltd has not yet adopted a formal pollution policy, its **commitment to product quality, safety, and sustainability** contributes to minimizing environmental impacts. Compliance with international standards such as *FSSC 22000* and *BRC Grade A*¹⁰ ensures strict control over production processes, hygiene, and waste management, helping to prevent contamination risks. Moreover, the company's ethical sourcing policies — including its *Modern Anti-Slavery* and *Child Labour Policies*¹¹ — promote responsible supplier practices that align with the principles of environmental care and pollution prevention.

¹⁰ For further information about the standards, please see § Policies in Chapter ESRS S4 Consumers and end-users.

¹¹ For further information about the policies, please see § Policies in Chapter ESRS S2 Workers in the value chain.

3.2 Metrics

3.2.1 Pollution of air, water and soil, and substances of concern and of very high concern

[E2-4] [E2-5]

During the reporting period, **none of Nactarome's production sites exceeded the emission thresholds** of air, water, or soil pollutants defined under Annex II of Regulation (EC) No. 166/2006 (E-PRTR). Based on the review of processes and material inputs, no significant generation or intentional use of microplastics was identified."The Company's approach to pollution management is based on strict compliance with environmental permits, continuous monitoring, maintenance of emission control systems, and dedicated processes for the treatment of potentially hazardous substances.

At a site-specific level, **Calaf Nuances** operates two boilers — one using diesel for heating and the other a thermal oil system — as well as an atomizer. All emissions are minimal and controlled through legally permitted mechanisms. Wastewater is treated through the on-site treatment plant, with regular sampling and analyses confirming compliance, and no soil contamination has been detected.

At **AromataGroup**, the soil at the Concorezzo site presents a low risk of chemical dispersion, whereas the Gessate site, with medium potential risk due to aging pipelines, flooring, and historical soil contamination (already known and managed under existing permits), is planned for closure in 2026. Air emissions are controlled through scheduled maintenance and upgrades of scrubber systems, including the completion of the Control Room project, and are monitored analytically on an annual basis.

For **Royal Buisman**, even under conservative estimates of process emissions from the caramelisation process, total emissions remain well below regulatory thresholds, and no exceedances have been reported. However, further characterisation of Volatile Organic Compounds (VOC) emissions is recommended to enhance data quality for future sustainability reporting.

Overall, all legal entities operate under valid environmental permits and maintain compliance through continuous monitoring, preventive maintenance, and proper management of emissions and waste streams. No instances of non-compliance, enforcement actions, or pollution-related incidents were reported during the reporting period.

4. ESRS E3 Water and marine resources

4.1 Impact, risk and opportunity management

[IRO-1]

Water stewardship is an integral part of Nactarome's environmental management approach. Although the Company has no dedicated water policy, responsible water use and wastewater management are embedded in the environmental and quality systems of each entity. The companies within Nactarome apply preventive measures to minimize consumption, avoid contamination, and ensure compliance with discharge regulations. Entities such as Royal Buisman, Calaf Nuances, Nactis Flavours, and Nactarome NV implement site-specific monitoring, sampling, and treatment processes, supported by targeted projects to recover and reuse water resources. These actions collectively demonstrate Nactarome's commitment to sustainable water management and continuous improvement in resource efficiency.

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
E3 Water and marine resources	Water	Water discharges		Sanctions due to violations and non-compliance with water discharge regulations	

4.1.1 Policies

[E3-1]

Although no company within Nactarome has a policy dedicated exclusively to water and effluent management, several existing **environmental and quality frameworks** indirectly address the responsible use of water resources. Royal Buisman integrates water protection measures within its environmental management practices, including the segregation of waste streams, controlled chemical-waste disposal, and wastewater monitoring to prevent contamination and ensure compliance with permit limits. Nactis Flavours promotes the efficient and responsible use of natural resources as part of its commitment to sustainable operations. Similarly, AromataGroup and IPAM embed environmental protection principles within their integrated quality and safety management systems, which include preventive measures to minimize pollution and optimize resource consumption. Across the legal entities, supplier codes of conduct and environmental commitments encourage partners to adopt responsible production practices, reinforcing the collective goal of reducing environmental impact and promoting the sustainable management of water and related resources.

4.1.2 Actions and targets

[E3-2] [E3-3]

The various legal entities that are part of Nactarome implement concrete actions to **optimize water use and minimize pollution risks**. Royal Buisman carries out annual wastewater sampling and monitoring at its Zwartsluis site to ensure compliance with discharge permits and local environmental regulations, covering all production processes and supporting continuous improvement in water stewardship. Nactis Flavours introduced a partial pumping service at the Lieusaint plant in 2024 to treat approximately 60% of the site's liquid effluents through composting and methanisation, with full coverage planned for July 2025. Calaf Nuances maintains a robust system for monitoring and managing wastewater through its internal treatment plant, regularly measuring pollutants to comply with regulatory thresholds and conducting both internal and external inspections. The Spanish company also implements water-efficiency measures in offices and production, including sensor-equipped faucets, foot-pedal taps, and projects to recover reactor cooling water, aiming to reduce consumption by 10–20% in the coming years. Nactarome NV is pursuing initiatives to optimize water use and reduce effluent risks, including the installation of a buffer tank for wastewater retention, a closed cooling circuit in production, and a feasibility study for a long-term purification system, with implementation milestones extending to 2030. Collectively, these actions demonstrate an intentional commitment to efficient water management, pollution prevention, and sustainable resource use.

AromataGroup

Water management represents a central pillar of AromataGroup's sustainability strategy, with a strong focus on innovation and regulatory compliance. In line with Italian D.Lgs. 152/2006 and D.P.R. 13/3/2013 n. 59, the Company adopted in 2024 a **biological wastewater treatment plant** at the Concorezzo site. The system, designed without the use of aggressive chemical agents, significantly improves pollutant removal efficiency and enhances process performance, while preparing the facility for the future consolidation of production activities from Vanzago (2025) and Gessate (2026). At the Gessate site, continuous monitoring systems for pH and conductivity were also implemented for cooling water discharge, ensuring precise control of effluent quality and ongoing environmental performance improvement. Together, these initiatives strengthen AromataGroup's responsible water management framework, mitigate environmental impacts, and ensure full compliance with national environmental regulations.

Calaf Nuances

Calaf Nuances implements a comprehensive system for monitoring and managing wastewater in line with national and regional regulations. The company operates an **internal treatment plant** (EDAR), where pollutants such as organic matter, solids, and nutrients are measured semi-annually to ensure compliance with discharge limits.

Compliance is further verified through **bi-weekly external monitoring** by Hera Holding, annual self-controls, and inspections by the Catalan Water Agency (ACA). To reduce water consumption, **efficiency measures** have been introduced across offices and production areas, including sensor-equipped faucets, foot-pedal taps, and a project to recover reactor cooling water, expected to cut total water use and discharge by 15–20%. Under its *Quality, Environmental and Food Safety Policy* and *ISO 14001* certification¹², the company monitors water consumption per kilogram of production and per employee, targeting a **10% annual reduction**. In response to regional drought conditions, a project is underway to achieve a 20% reduction in total water use between 2025 and 2027, either by recovering reactor cooling water or removing the reactor from production, reflecting Calaf Nuances' ongoing commitment to sustainable water management and pollution prevention.

Nactis Flavours

In 2024, a **partial pumping service** was introduced at the Lieusaint plant to **treat aqueous waste** through composting and subsequent **methanisation**, covering 60% of the site's liquid effluents. The initiative, completed between September and December 2024, aims to reduce environmental impact by improving **wastewater management**. Building on this progress, a complete pumping service for 100% of liquid effluents is scheduled to start in July 2025, with ongoing implementation.

Nactarome NV

In line with its commitment to responsible water management, Nactarome NV is pursuing several projects to optimize water use and minimize pollution risks. A **buffer tank for wastewater** is being installed to allow a 24-hour retention time, ensuring a more constant and controlled outflow while preventing the release of highly polluted effluents. The project, which covers all wastewater generated by the plant, is currently in the implementation phase, with quotation approval achieved and completion expected by 2026. Complementing this initiative, the company is conducting a **feasibility study for a wastewater purification installation** aimed at reducing pollutant loads in the long term, with a completion horizon set for 2030. Additionally, a **closed cooling circuit** will be installed in 2025 in the hammer mills of the blending department, replacing the previous flow-through cooling system. This measure significantly reduces water consumption and contributes to more sustainable use of natural resources within production operations.

Royal Buisman

Royal Buisman carries out **annual wastewater sampling and monitoring** to ensure compliance with discharge permits and local environmental regulations. The activity covers all production processes at the Zwartsluis site and confirms that effluent quality remained within permitted limits throughout 2024. Continuous monitoring and

¹² For further information about the certifications, please see § Policies in Chapter ESRS S4 Consumers and end-users.

documented laboratory analyses form part of the company's environmental management system, ensuring early detection of potential deviations and continuous improvement in water stewardship.

4.2 Metrics

4.2.1 Water consumption

Water management is a key element of Nactarome's sustainability strategy, which is focused on reducing consumption and minimizing environmental impact through efficient systems and continuous monitoring. In 2024, **total water consumption decreased by approximately 3%**, mainly driven by AromataGroup, Nactarome NV, and Calaf Nuances.

Notably, for AromataGroup, the gradual reduction of chemical synthesis activities and the commissioning of a new wastewater treatment system in Concorezzo improved pollutant removal efficiency and prepared the site for the planned consolidation of production activities from Vanzago (in 2025) and Gessate (in 2026).

However, Nactarome NV and AromataGroup remain the main contributors to overall water use due to their production processes. Only Nactarome NV uses groundwater, primarily for industrial operations such as solution preparation, equipment cleaning, sanitation, and wastewater treatment.

Calaf Nuances is the only legal entity within Nactarome that is located in a water-stressed area, as the Catalonia region experiences low rainfall and recurring drought conditions. As a consequence, the company pays a lot of attention to the efficient use of water.

A slight increase in water consumption between 2023 and 2024 is observed for Nactis Flavours, as it is due to the Lieusaint plant operating for the full year and the activation of sprinkler systems. Overall, the company continues to work towards optimizing water use and ensuring compliance with local and global environmental requirements.

Water intensity indicators improved year-over-year. In 2024, Nactarome recorded a decrease in water intensity, reflecting lower total water consumption combined with an increase in volume and net revenue. This indicates a more efficient use of water resources relative to the Company's output, demonstrating progress in decoupling operational growth from resource use.

Finally, Nactarome's water management showed a **positive trend with both total water withdrawals and discharges slightly decreasing**. This reduction indicates a small decrease in net water consumption, reflecting the Company's ongoing efforts to improve water efficiency and reduce environmental impact. Continued monitoring of discharge quality and operational practices, such as water reuse and process optimisation, ensures compliance with regulatory standards and reinforces Nactarome's commitment to sustainable water management.

[E3-4]

Water consumption (m ³)	2023	2024
Total water consumption	124,617.00	121,286.00
Total water consumption in areas at water risk, including areas of high-water stress	1,009.00	905.00

Water intensity (m ³ /€)	2023	2024
Total water consumption in the company's own operations	124,616.74	121,285.76
Company's net revenue in million euro	196.45	204.06
Water intensity¹³	634.34	594.36

Water consumption (m ³)	2023	2024
Water withdrawals	128,475.00	126,921.00
Water discharges ¹⁴	115,665.00	112,884.62

¹³ Total water consumption in m³ per million EUR net revenue.

¹⁴ The data do not include Nactarome Ltd for both years, and Royal Buisman for 2023.

5. ESRS E5 Resource use and circular economy

5.1 Impact, risk and opportunity management

[IRO-1]

Nactarome promotes the efficient use of resources and the reduction of waste throughout its production processes. The Company's approach focuses on optimizing material flows, extending product life cycles, and minimizing waste generation through prevention, reuse, and recycling. Each entity applies resource efficiency principles in line with its environmental management systems and certifications, supported by continuous improvement actions and training. Ongoing initiatives include the modernisation of production equipment, recovery of by-products, and improvement of packaging efficiency. These efforts contribute to environmental protection and alignment with circular economy principles.

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
E5 Resource use and circular economy	Resources inflows, including resource use			Production disruptions, volatility costs or loss of competitiveness due to challenges in sourcing an essential ingredients (e.g. scarcity, extreme weather events, geopolitical tensions)	

5.1.1 Policies

[E5-1]

The Nactarome legal entities promote responsible resource use and waste management through a combination of **environmental, quality, and safety frameworks**. AromataGroup, Calaf Nuances, Nactis Flavours, and Nactarome NV incorporate waste prevention, recycling, and efficient resource use within their broader *Environmental, Quality, and / or Health and Safety Policies*¹⁵, in line with Nactarome's overarching sustainability practices. These policies and procedures aim to minimize waste generation, enhance recovery, and contribute to circular economy objectives through continuous improvement and supplier engagement. Royal Buisman has adopted a dedicated *Waste Management Policy* (in Dutch "Afvalstromen") that defines clear procedures for the segregation, collection, and disposal of all waste streams, ensuring compliance with national regulations and promoting reuse and energy recovery. IPAM and Nactarome Ltd, while not having a formal environmental or waste management

¹⁵ For further information about the policies, please see § Policies in Chapters ESRS E1 Climate change and ESRS S4 Consumers and end-users.

policy, integrate responsible waste handling and recycling practices into daily operations, thereby supporting environmental compliance and contributing to Nactarome's overall efforts toward a more circular and sustainable production model.

AromataGroup

AromataGroup promotes efficient use of resources and responsible waste management as part of its integrated **Quality and Food Safety Policy**¹⁶. The company applies strict procedures for the safe handling, storage, and disposal of materials, aiming to reduce waste at source and encourage recovery whenever possible. Through continuous monitoring and process optimisation, AromataGroup works to minimize environmental impacts and contribute to the circular economy principles promoted by Nactarome.

IPAM

IPAM supports the responsible management of materials and waste through practices designed to ensure **operational efficiency and environmental compliance**. Waste prevention, proper disposal, and recycling are integral to the company's operational culture, reflecting its ongoing effort to reduce environmental impacts and contribute to a circular approach in ingredients production.

Calaf Nuances

Calaf Nuances integrates environmental responsibility into its operational practices, ensuring compliance with applicable **waste management regulations** and promoting the **efficient use of resources**. The company encourages waste prevention and separation within its facilities and applies responsible sourcing criteria to minimize upstream waste generation. These actions reflect Calaf Nuances' contribution to circularity and environmental protection.

Nactis Flavours

Within the framework of its **Quality, Health, Safety, Environment & Corporate Social Responsibility Policy**¹⁷, Nactis Flavours promotes the efficient management of resources and the reduction of waste across its operations. The company's *Supplier Code of Ethics*¹⁸ also reinforces expectations for responsible environmental practices along the supply chain, including proper waste handling and recycling. Together, these instruments support continuous improvement in resource efficiency and alignment with circular economy principles.

¹⁶ For further information about the policy, please see § Policies in Chapter ESRS S4 Consumers and end-users.

¹⁷ For further information about the policy, please see § Policies in Chapter ESRS S4 Consumers and end-users.

¹⁸ For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

Nactarome NV

Nactarome NV integrates environmental and safety considerations into its daily operations to promote efficient resource use and responsible waste management. The company follows its **Environmental Policy**¹⁹ principles to ensure the proper handling, storage, and disposal of materials, while continuously working to reduce waste generation and enhance recycling and recovery. Through close collaboration with suppliers and ongoing process optimisation, Nactarome NV contributes to Nactarome's overall efforts toward circularity and a more sustainable production model.

Royal Buisman

Waste Management Policy (Afvalstromen)

The *Afvalstromen Policy* governs the safe, compliant, and environmentally responsible **management of all waste streams** at Royal Buisman. It aims to ensure proper **separation, collection, and disposal** of paper, residual, chemical, and fermentation waste, while promoting **circular-economy solutions** such as energy recovery from by-products. The policy seeks to prevent environmental contamination — particularly of water systems — by ensuring that all waste handling is legally compliant and protective of natural resources.

Implementation and monitoring are managed by the “Preventiemedewerker” / **QHSE Manager**, under the supervision of the Managing Director. Compliance is verified through collection logs, certified external waste contractors, and regular evaluations. The policy applies to **all internal operations** and aligns with the “Afvalstoffenbesluit” (i.e., Waste Decree) and “Wet Milieubeheer” (i.e., Environmental Protection Act), as well as with waste-reduction goals. Expectations from regulators, contractors, and employees have been incorporated into its design, while training and visual instructions in production areas ensure correct segregation practices. Through this policy, Royal Buisman promotes the **efficient use of materials** and prioritizes **waste prevention, reuse, and recycling** in accordance with circular-economy principles and the EU waste hierarchy.

Nactarome Ltd

Nactarome Ltd integrates **waste reduction and resource efficiency** into its daily operations, aligning with its environmental and ethical commitments. The company promotes responsible waste segregation and safe disposal to encourage sustainable practices. These actions support the transition towards a circular economy and demonstrate Nactarome Ltd's contribution to minimizing the environmental footprint of its activities.

¹⁹ For further information about the policy, please see § Policies in Chapter ESRS E1 Climate change.

5.1.2 Actions and targets

[E5-2] [E5-3]

Within Nactarome companies, various actions are being implemented to **promote circularity, improve waste management, and strengthen resource efficiency** throughout operations and supply chains. The initiatives undertaken by individual entities aim to minimize waste generation, enhance recycling practices, and ensure responsible sourcing of raw materials, thereby supporting the transition towards more circular production models. The **inflow of resources is mostly centralised at Nactarome level**, with legal entities dealing with minor suppliers. Actions include the optimisation of packaging and logistics processes, the expansion of waste segregation and recovery systems, and the diversification of sourcing channels to improve supply chain resilience. These measures are complemented by regular monitoring, staff training, and collaboration with certified waste management and recycling partners. Collectively, they reflect the Company's commitment to reducing its environmental footprint while fostering long-term sustainability and operational efficiency.

Calaf Nuances

In line with *ISO 14001*²⁰ and its *Quality, Environmental and Food Safety Policy*²¹, Calaf Nuances has adopted multiple initiatives to promote responsible waste management and circularity. The company operates a **selective waste collection system** registered with the Catalan Waste Agency, covering 26 waste categories. It complies with regulatory reporting obligations, including the Annual Declaration of Industrial Waste (DARI) and packaging waste submissions to the Generalitat de Catalunya. Staff receive **yearly training** under the "Annual Training Plan" (FGQ-01) on selective collection, audit findings, and regulatory updates such as the new packaging waste regulations (RD 1055/2022). The company also promotes the use of **reusable rental pallets** through a partnership with TOSCA and uses **100% recycled disposable pallets** where reuse is not possible. Furthermore, in early 2024, Calaf Nuances reduced the dimensions of its cardboard boxes for powdered flavourings (representing 90–95% of sales), **lowering cardboard and energy consumption**. These ongoing actions reflect the company's commitment to reducing waste and advancing circular economy principles.

Furthermore, Calaf Nuances systematically monitors waste generation and other environmental impacts using defined indicators. **Annual evaluations** cover the full life cycle of operations — from raw material and energy consumption to emissions and waste generation — and inform an annual action plan addressing significant environmental aspects. Staff receive regular **training on selective waste collection and recycling practices**, while production formulas are reviewed to minimize raw material losses and waste. The company also promotes the **use of recycled materials in packaging**, including 100% recycled pallets and the continuous assessment of recyclable packaging alternatives. Additionally, through the *PEPE-ENVALORA (SCRAP) Business Plan for Prevention and Eco-Design*, Calaf Nuances is committed to **minimizing packaging**

²⁰ For further information about the standard, please see § Policies in Chapter ESRS E1 Climate change.

²¹ For further information about the policy, please see § Policies in Chapter ESRS S4 Consumers and end-users.

waste, improving recyclability, and fostering collaboration and innovation in eco-design between 2024 and 2029.

Nactis Flavours

To strengthen supply chain resilience and reduce dependency on single sources, for resources not managed centrally, but falling under the responsibility of the company, Nactis Flavours launched in 2024 an initiative to **diversify the geographical origins and sourcing channels of its raw materials**. This strategy focuses on identifying alternative suppliers and expanding the company's network to secure continuity of supply, **ensure consistent product quality**, and **mitigate risks** linked to shortages or disruptions. Initial actions have already been implemented, including the substitution of certain raw materials such as coffee for the Morangis site. The initiative will continue and expand in 2025 and 2026, with the objective of broadening sourcing options and promoting sustainable procurement practices across all raw materials.

Nactis Flavours is standardizing audits related to the **transport of hazardous materials**, beginning in 2025 with the Furdenheim site, to ensure full compliance with regulatory requirements and improve operational safety.

Nactarome NV

To support resource efficiency and resilience in its sourcing practices, Nactarome NV continuously monitors the **availability and prices of plant-based raw materials**. This ongoing activity ensures that procurement decisions are informed by both environmental and market considerations, promoting the use of sustainable ingredients and contributing to the long-term stability of the company's supply chain. The systematic follow-up also supports early identification of risks linked to material scarcity, enabling Nactarome NV to maintain product quality while fostering more circular and resource-efficient production models.

Royal Buisman

Royal Buisman has enhanced its **waste-segregation and recycling procedures** to maximize resource recovery and minimize landfill disposal. The revised procedure, effective from 1 May 2024, defines specific waste streams for paper, cardboard, archives, residual materials, chemicals, and fermentation by-products. All waste is managed by licensed partners to guarantee proper recycling or treatment.

5.2 Metrics

5.2.1 Resources inflows

[E5-4]

The overall weight of production materials purchased increased from 59,167 t in 2023 to 60,276 t in 2024. This growth reflects both business expansion and variations in raw material sourcing across categories. Several ingredient groups — including colours, molecules, essential oils, and flavours — show moderate year-on-year increases, while others, such as savoury ingredients, spices and herbs, grains and sweeteners, and extracts, decreased compared to 2023, indicating shifts in product mix and customer demand. Some categories present significant fluctuations due to changes in companies' production and market-driven adjustments, such as the phase-out of fish purchases and the introduction of new categories including cocoa, lemon distillation, and uncategorised materials. In addition to the resources presented, in 2024 the Company also purchased 14,447,145 packaging units.

Belgium feed stock and fish inputs are classified as **by-products of other production processes**: the Belgium feed stock originates from soy, rapeseed, and other cereals, while the fish input derives from processed fishbones, shells, and other residual materials. By integrating these secondary raw materials into production, Nactarome supports a **circular-economy approach** that maximizes the use of resources, reduces waste, and promotes the responsible valorisation of upstream ingredients.

No recycled materials were used during the reporting period, and the share of certified biological or sustainably sourced ingredients remains very limited, as it only concerns Fairtrade Vanilla.

Main production materials bought by weight (metric tons, t)	2023	2024
Flour	33,245	33,774
Ingredients	9,548	6,246
Savory	2,031	1,977
Colours	1,736	1,881
Molecules	169	170
Vanilla	30	43
Essential oils / Oleoresins	197	186
Spices & herbs	862	710
Grains & sweeteners	5,620	4,764
Belgium feed stock	4,417	7,572
Fruits & vegetables	188	184
Coffee	485	421
Flavour	187	264
Extracts	71	45
Fish	381	-
Cocoa	-	27

Main production materials bought by weight (metric tons, t)	2023	2024
Iprona distribution	-	370
Internal	-	181
Uncategorised	-	1,462
Total weight of the main production materials bought	59,167	60,276

Main production materials bought by weight (metric tons, t)	2023	2024
Total weight of the main production materials bought	59,167	60,276
Total recycled materials used	0	0
	0%	0%
Total certified biological ingredients and / or ingredients coming from a sustainable supply chain	-	1.15
	-	0.0019%

5.2.2 Resources outflows

Nactarome is committed to minimizing waste generation and promoting circularity across its operations. The Company's waste management approach is based on rigorous monitoring, employee training, and full compliance with applicable local and international regulations.

Due to the use of chemical substances in the production of artificial flavours and colours alongside organic products, the Company generates some hazardous waste. Where necessary, production plants are equipped with on-site treatment technologies, such as water purifiers, or wastewater is managed by authorised external service providers.

In 2024, the total amount of waste generated increased by 12%, in line with the overall rise in production volumes. This is primarily due to AromataGroup, which generated significant volumes of hazardous liquid waste, such as mother liquors and aqueous solutions at the Gessate site, where these streams are managed in dedicated tanks. AromataGroup relies on a general contractor for waste treatment services, with a mandate to maximize the share of waste sent for recovery where technically feasible.

In 2024, recycled waste is largely generated by the Morangis site of Nactis Flavours, where coffee by-products from roasting processes are recycled, and by IPAM, which recycled approximately 99% of its waste.

Calaf Nuances also continued to recycle, recover, or value around 60% of its waste in both years. Several initiatives have supported these results, including reducing packaging size, recycling natural chemical inputs, and reformulating flavours that are associated with higher material losses during production. Additionally, all Calaf Nuances' staff received training on proper waste segregation practices to reinforce a culture of circularity.

Finally, the decrease in the total amount of waste generated by Royal Buisman between 2023 and 2024 can be attributed to an exceptional disposal activity carried out in 2023, which was related to the replacement and disposal of a cooling plate.

[E5-5]

Resource outflows (tonnes, t)	2023	2024
Total amount of waste from its own operations	8,552.16	9,555.07
The total amount of waste diverted from disposal, with a breakdown between	3,216.86	1,964.78
Non hazardous waste	3,131.04	1,856.87
<i>preparation for reuse</i>	1,720.04	0.00
<i>recycling</i>	1,401.57	1,828.74
<i>other recovery operations</i>	9.43	28.13
Hazardous waste	85.82	107.91
<i>preparation for reuse</i>	80.78	99.35
<i>recycling</i>	5.04	6.06
<i>other recovery operations</i>	0.00	2.50
The total amount of waste directed to disposal, with a breakdown between	5,335.30	7,590.29
Non hazardous waste	2,384.88	3,616.13
<i>Incineration</i>	351.95	127.56
<i>Landfill</i>	133.88	138.12
<i>other disposal operations</i>	1,899.05	3,350.45
Hazardous waste	2,950.42	3,974.16
<i>Incineration</i>	6.00	7.00
<i>Landfill</i>	0.00	0.00
<i>other disposal operations</i>	2,944.42	3,974.16
Total amount of non-recycled waste	5,335.30	7,590.29
	62%	79%

Social Information

6. ESRS S1 Own Workforce

6.1 Impact, risk and opportunity management

[SBM-3]

Nactarome's approach to managing impacts, risks, and opportunities concerning its own workforce is grounded in the promotion of safe, fair, and inclusive working conditions. Processes across the legal entities aim to ensure secure employment, adequate wages, gender equality, and access to training and development. Health and safety are managed through preventive measures, risk assessments, and continuous monitoring, while employees are provided with mechanisms to raise concerns confidentially. These systems foster well-being, engagement, and accountability, enabling Nactarome to prevent negative impacts and enhance its social performance across all entities.

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
S1 Own workforce	Working conditions	Secure employment	Economic security of employees through permanent employment contracts		
S1 Own workforce	Working conditions	Working time	Employee satisfaction with working hours		
S1 Own workforce	Working conditions	Adequate wages	Economic security of workers due to alignment of compensation and incentive policies with the market		
S1 Own workforce	Working conditions	Health and safety	Improvement of employees' physical and mental well-being through health support tools and services, such as additional health insurance	Reputational damage due to workplace accidents involving employees	
S1 Own workforce	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	Discrimination against female employees in accessing top positions and/or career		

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
			development opportunities		
S1 Own workforce	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	Gender pay gap for equal work		
S1 Own workforce	Equal treatment and opportunities for all	Training and skills development	Development of employee skills and capabilities through training and professional development programmes		
S1 Own workforce	Other work-related rights	Privacy	Violation of employees' right to privacy due to data leakage and/or data loss		

6.1.1 Policies

[S1-1]

Across Nactarome companies, employee well-being, safety, and fair working conditions are promoted through a combination of **national collective agreements, internal management systems, and specific company policies**. While the formality and scope of these instruments vary among entities, all of them ensure compliance with national labour legislation and alignment with the Company's ethical and social responsibility principles. AromataGroup and Nactis Flavours apply national collective agreements for the chemical industry in Italy and France, respectively, establishing comprehensive frameworks for working conditions, remuneration, equality, and social dialogue. These are complemented by company-level agreements and employee handbooks that promote flexibility, inclusion, and work-life balance. Royal Buisman, Nactarome Ltd, and Calaf Nuances have adopted formal occupational health and safety policies that set clear responsibilities for preventing accidents and safeguarding employee well-being, in compliance with local legislation such as the Dutch *Arbowet* and Spanish occupational risk prevention regulations. Nactarome Ltd further reinforces this commitment through additional policies on equal opportunity, mental health and well-being, stress management, parental leave, and data protection. IPAM and Nactarome NV, while not governed by formal stand-alone policies, embed social responsibility, health and safety, and non-discrimination principles into daily operations, ensuring that all employees work in safe, inclusive, and respectful environments. Unless otherwise specified, these policies apply to permanent, fixed-term, full-time and part-time employees. Collectively, these frameworks reflect Nactarome's dedication to protecting people, fostering equality, and supporting professional growth across all its entities.

AromataGroup

National Collective Labour Agreement for the Chemical Industry

AromataGroup applies the *National Collective Labour Agreement* (in Italian “Contratto Collettivo Nazionale del Lavoro”, CCNL) *for the Chemical Industry*, which establishes the fundamental rules governing working conditions, health and safety, remuneration, and labour relations within the sector. The agreement aims to ensure fair and safe working environments, promote professional equality, and regulate the relationship between companies, employees, and trade unions.

CCNL covers key areas such as:

- **Working conditions:** regulation of working hours, shift work, night work, rest periods, and specific provisions for women and young workers;
- **Professional equality and inclusion:** safeguards against discrimination, promotion of gender equality, and measures supporting diversity and inclusion;
- **Remuneration and classification:** definition of minimum wage scales based on qualification levels and seniority;
- **Industrial relations:** recognition of employees’ representatives, establishment of monitoring committees, and reference to sectoral collective bargaining;
- **Health and safety at work;**
- **Leave and absences:** provisions for paid leave, family events, study purposes, and other specific circumstances.

The agreement applies to all employees of AromataGroup, including executives, white-collar and blue-collar workers, under permanent, temporary, part-time, or apprenticeship contracts. It also governs relationships with unions and social partners. CCNL does not apply to external suppliers or self-employed contractors operating outside the scope of the chemical and related sectors.

At company level, the **Management and Human Resources Department** are responsible for implementing the provisions of the CCNL within employment contracts and workplace practices, ensuring full compliance with legal and contractual requirements. The agreement explicitly and implicitly refers to relevant **national and European regulatory frameworks**, including Italian labour law, the Civil Code, Legislative Decree 81/2008 on occupational health and safety, the Environmental Code (Legislative Decree 152/2006), and EU directives on working time, parental leave, and non-discrimination. It also integrates collective welfare and training systems such as FONCHIM, FASCHIM, and Fondimpresa.

Collective Bargaining Agreement

As a result of **collective bargaining** between employers’ associations and trade unions, CCNL inherently reflects the interests of key stakeholders, including employers, workers, and their representatives. The agreement is made accessible to all employees through the HR SharePoint platform, with a paper version available at the HR office.

AromataGroup has also signed a **second-level Collective Bargaining Agreement** with local trade unions. This agreement aims to enhance workplace flexibility, promote work-life balance, and establish a performance-based bonus system linked to specific company and individual objectives. It also governs the company's **welfare system**, managed through a dedicated online platform offering a variety of services, including schoolbook purchases, supermarket vouchers, support for elderly family members, and reimbursement of medical expenses.

Employee Handbook

In addition to collective bargaining provisions, AromataGroup adopts an *Employee Handbook*, which defines the main internal rules – i.e., HR Policies - governing working conditions, health and safety, social relations, employee conduct, training, and working hours.

The company's **HR Policies** apply to all employees across its Italian sites and ensure consistent application of contractual, legal, and ethical labour standards. The **Human Resources Department** is responsible for enforcing the provisions of the collective and second-level agreements, monitoring compliance, and fostering positive labour relations within the company.

Both the collective agreement and the second-level company agreement are made available to all employees via the HR SharePoint platform, with a printed version accessible at the HR office.

Working Conditions, Equal Treatment, and Employee Development

AromataGroup has implemented a structured **occupational health and safety system** aimed at preventing workplace accidents and protecting employee well-being. Workplace incidents are tracked in a regularly updated database, enabling analysis of frequency, severity, and trends. Detailed **risk assessments** by workstation guide preventive measures, including specific training, ergonomic improvements, and the correct use of personal protective equipment (PPE).

The company ensures strict compliance with national and European legislation on non-discrimination, harassment prevention, and professional equality. Recruitment processes are conducted objectively, without regard to gender, origin, age, disability, or personal beliefs. The workforce includes employees of diverse nationalities, reflecting the company's inclusive culture. All employees have **equal access** to training, career development, and welfare initiatives, in line with the principles of fairness and diversity. The *Behavioural Charter* reinforces a respectful and collaborative workplace culture, while the second-level *Collective Bargaining Agreement* supports equal treatment, flexibility, and work-life balance, including assistance in cases of serious illness. The company's **well-being platform** further promotes equity by providing access to welfare services such as educational, medical, and social support.

AromataGroup promotes professional growth through an **annual skills development plan**, updated based on managerial feedback and business needs. Training opportunities — ranging from internal courses and e-learning to coaching and mentoring — are accessible to all employees, ensuring **equal opportunity** for development and continuous improvement.

IPAM

At IPAM, social responsibility and the protection of people are integral to corporate management. The company maintains a structured **system for preventing workplace accidents**, based on risk analyses by workstation, regular updates of an internal register tracking frequency and severity rates, and continuous adaptation of prevention measures such as specific training, ergonomic assessments, and the use of personal protective equipment (PPE). Although not formalised as a stand-alone policy, this system represents a proactive approach to occupational health and safety and is fully embedded in day-to-day operations.

IPAM also upholds a strong commitment to **non-discrimination, diversity, and inclusion**. All recruitment, training, and career development processes strictly comply with Italian and European legislation, ensuring equal treatment regardless of gender, age, nationality, or personal circumstances. The company's workforce reflects real diversity, with a significant number of employees with residence permits, mainly from India and Africa, fully integrated within teams and enjoying equal access to professional development opportunities. The company promotes a respectful and collaborative work environment supported by its *Behavioural Charter* and by the *Organisation, Management, and Control Model* (under Italian Legislative Decree 231/01)²², which includes specific measures against corruption, harassment, and illicit conduct. Periodic meetings with department managers and targeted training for executives reinforce these principles.

Calaf Nuances

Preventive Policy on Occupational Risk

Calaf Nuances has adopted a *Preventive Policy on Occupational Risk*, which reflects the company's firm commitment to integrating **occupational health and safety management** into its overall organisational structure and operations. The policy's main objectives are to promote the prevention of occupational risks, ensure continuous improvement in workplace safety, and foster a culture of employee involvement, motivation, and training in risk prevention and safe work practices. It also establishes a clear **Prevention Plan** defining responsibilities, resources, and methods to achieve safety objectives, in compliance with relevant occupational risk prevention regulations.

The policy applies to **all activities and employees** within Calaf Nuances, with no exclusions, recognizing workers as the company's most valuable asset. It explicitly prohibits any form of disrespect, discrimination, or harassment based on gender, race, or religion, reinforcing a safe and respectful work environment.

The company's **Director**, holds ultimate responsibility for implementing and continuously improving the Prevention Plan, ensuring that all employees actively participate in its success. Through this policy, Calaf Nuances reaffirms its **commitment to workplace safety and client satisfaction**, in line with its broader quality and sustainability objectives.

²² For further information about the policies, please see § Policies in Chapter ESRS G1 Business conduct.

The policy is made available to all relevant stakeholders through the company's "SP ACTIVA" portal and can also be provided electronically upon request, ensuring accessibility and transparency across the organisation.

Nactis Flavours

National Collective Agreement for the Chemical Industry

Nactis Flavours applies the *French national collective agreement for the chemical industry* (in French "Convention collective nationale des industries chimiques et connexes", IDCC 0044), which governs working conditions, remuneration, training, and social dialogue across all company sites in France. This framework ensures **compliance with national labour standards** and provides guarantees in areas such as professional equality, non-discrimination, occupational health and safety, and employees' right to representation. The agreement defines **key aspects of employment relations**, including working hours, remuneration scales, leave entitlements, and the prevention of workplace risks. Implementation is overseen by the **HR department**, which ensures that provisions are respected across all operations. The policy was negotiated with national trade unions and is accessible to all employees via the HR SharePoint and in paper format at the HR office.

Health and Safety Policy

Nactis Flavours implements a comprehensive *Health and Safety Policy*, aligned with the company's overarching Quality, Food Safety, Occupational Health, Environmental, and Social Commitment guidelines. The policy aims to protect **employees' wellbeing** and prevent **workplace incidents** by promoting safe working conditions, providing adequate training, and ensuring compliance with regulatory requirements. Its key priorities include industrial safety, control of emissions, waste reduction, energy monitoring, and continuous improvement through certifications such as *FSSC 22000* and *ISO 9001*. The **Health and Safety Director** is responsible for the policy's implementation, supported by regular consultations with employee representatives during CSE meetings held at least four times a year. The policy is made available to all staff via internal communication boards.

Employee Assessment and Performance Review Policy

Nactis Flavours conducts structured **annual and biennial evaluations** to foster professional development and maintain employee engagement. The Annual Review (in French "Entretien Individuel") provides an opportunity for each employee and their manager to discuss performance, achievements, challenges, and future objectives. In addition, **professional interviews** (French "Entretiens Professionnels") are organised every two years to assess career development prospects and ensure long-term employability. This system promotes transparent communication, skills enhancement, and alignment between individual and corporate goals. The **HR Manager** oversees the process, while managers are directly responsible for conducting the interviews. The policy applies to all Nactis Flavours employees under permanent contracts and is available to all staff through internal HR communication channels.

Working Conditions, Equal Treatment, and Employee Development

Nactis Flavours has established a comprehensive framework to promote health and safety, equal treatment, and inclusion within the workplace, even when not all elements are formalised into distinct policies. A structured **system for preventing workplace accidents** is in place, coordinated by the HR department together with site safety officers. This includes the continuous monitoring of incidents through a dedicated register, workstation-specific risk analyses, and the annual update of the *Document Unique d'Évaluation des Risques (DUER)*. Accident flash reports are also shared internally to communicate root causes and corrective actions, reinforcing safety awareness and the prevention culture.

Regarding equality and inclusion, the company applies all provisions of the French Labour Code on non-discrimination, professional equality, and harassment prevention. Recruitment, training, and career development processes are managed in strict compliance with Article L1132-1 of the Labour Code, ensuring that no discriminatory criteria are applied. The company demonstrates its commitment to gender equality through the annual publication of its **gender equality index**, which scored 88/100 in the latest assessment. **Inclusion** is further supported by the employment of people with disabilities, in line with national obligations (Law No. 87-517), and by the integration of employees from diverse backgrounds, including foreign workers with residence permits, all enjoying equal access to training and professional development opportunities.

To prevent and address discrimination or harassment, Nactis Flavours has established **grievance mechanisms** enabling employees to report concerns confidentially. A harassment officer, appointed within the Social and Economic Committee (CSE), serves as a reference contact for cases of moral or sexual harassment. Employees can also raise issues through HR or management, who ensure confidentiality and follow up with appropriate actions. The company promotes a culture of respect and collaboration through its behavioral charter and regular discussions during QWL and departmental meetings.

In terms of professional development, Nactis Flavours actively supports **continuous learning** and **skills improvement**. Training needs are identified through annual individual reviews, manager feedback, and regulatory requirements, ensuring equal access for all employees regardless of position, seniority, or contract type. Training is provided through various formats, including internal sessions, external courses, mentoring, and e-learning, with particular attention to new hires and production staff. Together, these measures reflect a proactive commitment to workplace safety, equal opportunity, and professional growth for all employees.

Nactarome NV

Nactarome NV places the well-being and development of its employees at the centre of its operational management, in alignment with its **commitment to ethical conduct and social responsibility**. The company fosters a safe, inclusive, and respectful work environment, ensuring compliance with all applicable labour and safety regulations. Training and awareness initiatives are regularly promoted to strengthen professional skills and reinforce a culture of responsibility and quality. Employee engagement is

encouraged through open communication channels and collaboration across departments, contributing to motivation, retention, and continuous improvement.

Royal Buisman

Occupational Health and Safety Policy

Royal Buisman's *Occupational Health and Safety Policy* (Dutch "Arbobeleid") establishes the framework for maintaining a **safe, healthy, and pleasant workplace** for all employees as a prerequisite for high-quality, food-safe production. The policy aims to prevent accidents, occupational diseases, and unsafe conditions, ensuring compliance with **Dutch occupational legislation** ("Arbowet") and fostering continuous improvement.

Core processes include regular risk assessments, preventive medical checks, use of personal protective equipment, emergency preparedness, incident reporting and investigation, and ongoing training. The policy applies to **all workers** — permanent, temporary, and agency staff — as well as **external contractors** and **occupational health partners**. Responsibility for execution lies with the **Prevention Officer** and the entire management structure, while the employer retains ultimate accountability.

Employee health and safety interests are addressed through consultation mechanisms, workplace safety meetings, and cooperation with **external occupational-health experts**. The policy and procedures are available through the internal quality system (Synergy) and reinforced during onboarding and refresher training, ensuring that all staff are aware of their responsibilities and rights.

Nactarome Ltd

Health and Safety Policy

Nactarome Ltd places the protection of the **health, safety and welfare** of its employees, contractors, visitors and all people affected by its operations at the core of its business practices. The *Health and Safety Policy* commits to preventing accidents, injuries and occupational illnesses by maintaining safe systems of work, ensuring compliance with relevant UK legislation such as the Health and Safety at Work Act, and fostering a proactive safety culture. The policy addresses key **operational risks**, including work at height, exposure to hazardous substances (COSHH), manual handling, noise and vibration, driving on company business, fire and electrical safety, and lone working. **Risk assessments, appropriate control measures and employee training** are central to the implementation process. The **Managing Director** holds overall accountability, supported by the Board of Directors and the HS&E Manager, while departmental managers are responsible for day-to-day compliance. Independent inspections, accident reporting, health surveillance and annual reviews are conducted with the support of WT Consultancy (SW) Ltd, an external advisor providing specialist audits, investigations and training. The policy is made visible to all employees through workplace noticeboards, induction programmes and regular safety meetings, ensuring awareness and engagement at every organisational level.

Occupational Stress Policy

The *Occupational Stress Policy* reflects Nactarome Ltd's recognition that **employee mental wellbeing** is integral to health, performance and long-term sustainability. The policy's main objective is to prevent, identify and manage **work-related stress** through proactive assessment and intervention. It outlines processes for regular stress identification via employee surveys, workload reviews and performance appraisals. Stress management measures include access to Mental Health First Aiders, confidential support through the Employee Assistance Programme (EAP), and promotion of **work-life balance** through flexible working arrangements and appropriate workload allocation. Responsibility for implementation rests with the **HS&E Manager** and the management team, who are tasked with cultivating a supportive workplace culture that encourages open communication about wellbeing. Employees are encouraged to report stress factors to their line managers or HR without fear of stigma or reprisal. The policy's **effectiveness** is monitored through periodic reviews, feedback collection and continuous improvement initiatives, ensuring responsiveness to evolving employee needs.

Equal Opportunity Policy

Nactarome Ltd's *Equal Opportunity Policy* embodies the company's commitment to **fairness, diversity and inclusion** across all employment stages — from recruitment and training to career progression and termination. The policy explicitly prohibits **discrimination**, whether direct or indirect, based on protected characteristics including age, gender, race, disability, religion or belief, sexual orientation, marital or parental status, and employment type. It applies not only to employees but also to job applicants, contractors, agency staff, consultants and volunteers working with the company. The **Directors** bear ultimate responsibility for policy oversight and compliance with relevant statutory frameworks such as the *Equality Act*. Regular reviews of recruitment processes, staff training needs and managerial practices ensure **alignment with the company's diversity objectives**. Employees are required to familiarize themselves with the policy and can seek clarification or report concerns to their line manager. By fostering equal treatment and inclusion, the policy supports employee motivation, retention and ethical governance throughout the organisation.

Mental Health and Wellbeing Policy

The *Mental Health and Wellbeing Policy* builds on Nactarome Ltd's broader commitment to employee welfare by establishing structured practices that promote positive mental health and prevent discrimination, bullying and harassment. The policy aims to reduce stigma associated with **mental health conditions**, increase awareness through targeted training, and integrate wellbeing principles into daily management. It identifies **workplace stress** as a key factor influencing mental wellbeing and aligns closely with the *Occupational Stress Policy*. Implementation involves **collective responsibility**: the organisation leads strategic initiatives; line managers ensure supportive practices within their teams; and employees are encouraged to take personal responsibility for self-care and participation in wellbeing programmes. Training, awareness campaigns and communication initiatives support a **culture of openness and mutual respect**. Feedback channels enable employees to share their experiences and contribute to the continuous enhancement of wellbeing initiatives. The policy is

introduced during induction and communicated regularly to maintain awareness and inclusiveness across all roles and functions.

Shared Parental Leave Policy

Nactarome Ltd's *Shared Parental Leave (SPL) Policy* reinforces the company's dedication to **family-friendly and inclusive employment practices**. The policy allows eligible parents — whether through birth or adoption — to share childcare responsibilities and coordinate leave arrangements flexibly during the first year after the child's arrival. It sets out the statutory entitlements for leave and pay, eligibility conditions, notification requirements and rights during and after SPL, including the right to return to work. Monitoring and administration are managed by the **HR department**, under the supervision of the HR Manager, who provides guidance to employees and ensures compliance with UK employment legislation. The policy aims to support both mothers and fathers or partners, reflecting **diverse family structures** and promoting **gender equality in caregiving**. It balances employee needs for flexibility with the company's operational continuity, thereby strengthening employee satisfaction and engagement. The policy is available to all employees through the *Employee Handbook* and internal HR communication channels.

Data Protection Policy

To ensure the privacy and protection of personal information, Nactarome Ltd has established a comprehensive *Data Protection Policy* aligned with UK and EU data protection legislation, including GDPR principles. The policy sets out obligations for the lawful, fair and transparent processing of personal data related to **employees, customers, suppliers and other stakeholders**. It aims to maintain trust in the company while preventing data breaches and misuse of information. The **Operations Director**, acting as Data Protection Manager, oversees compliance and supports staff through training and guidance on handling sensitive data. **Preventive measures** include the use of privacy notices, encryption, access controls, secure storage, and limitations on data sharing. The policy also safeguards the rights of data subjects, including access, correction, deletion, restriction of processing, and objection to use. Internal communication of the policy is ensured through the *Employee Handbook* and mandatory training sessions, while external stakeholders are informed via the company's privacy notices, which explain how data is collected, used and protected.

6.1.2 Processes to remediate negative impacts and channels for own workers to raise concerns

[S1-3]

Nactarome has established a structured system to **prevent, identify, and address potential negative impacts on its workforce**, while providing secure and confidential channels for employees to raise concerns or suggestions. All legal entities have implemented diversified procedures and tools — including whistleblowing platforms, suggestion boxes, dedicated HR email addresses, GDPR contacts, and representatives for harassment or discrimination issues — accessible both digitally and on-site. Reports

are handled confidentially, with protection against retaliation, and trigger corrective processes that include assessment, root-cause analysis, action planning, and monitoring of outcomes. These mechanisms ensure transparency, accountability, and continuous improvement in managing workers' rights, working conditions, and overall well-being across all Nactarome companies.

AromataGroup

Social responsibility is central to AromataGroup's human resources and corporate management approach. The company is committed to preventing, identifying, and addressing any negative impact that may affect employees' well-being, safety, or dignity, while fostering an open and transparent culture.

A **structured reporting and dialogue system** enables employees to raise concerns or share suggestions safely and confidentially through multiple channels, including regular team meetings, suggestion boxes, the Ambassadors Project, a dedicated HR department email, and direct contact with the **GDPR Officer** for data protection issues. In addition, a whistleblowing platform — managed externally to guarantee anonymity and protection from retaliation — allows employees to report potential misconduct or unlawful behaviour, which is also monitored by the **Supervisory Body** (Italian "Organismo di Vigilanza", OdV). When an issue is identified, AromataGroup activates a **corrective process** involving assessment, action planning, and follow-up under HR supervision. Measures may include targeted training, organisational adjustments, or disciplinary action, depending on the case.

Through these mechanisms, AromataGroup ensures open dialogue, accountability, and continuous improvement in managing human rights, working conditions, and employee well-being across all sites.

IPAM

To support continuous improvement in working conditions and employee well-being, IPAM has implemented multiple **grievance and dialogue mechanisms**. Employees can share feedback, concerns, or improvement ideas through suggestion boxes, a dedicated HR email address, and a GDPR-specific contact point. In addition, an **independent whistleblowing channel** — managed by an external consultant — ensures confidential and impartial handling of reports relating to harassment, discrimination, or other ethical concerns. Protection against retaliation is explicitly guaranteed. When an adverse situation is identified, the Human Resources Department, sometimes in collaboration with trade unions, activates a structured corrective process involving investigation, definition of an action plan, and timely implementation of appropriate measures.

Calaf Nuances

Calaf Nuances promotes a work environment based on ethical principles, respect, and responsibility, in line with the ten principles of the United Nations Global Compact and the company's commitment to human rights and fair labour practices. Within this framework, the company recognizes the importance of ensuring that employees can **report any concerns or behaviours** inconsistent with the ethical and regulatory standards governing company operations. The **management**, which holds ultimate responsibility for ethics and sustainability, acts as the main reference point for handling and resolving any reports or issues, ensuring that they are addressed with confidentiality, impartiality, and in alignment with the company's values.

Nactis Flavours

Nactis Flavours has established structured processes to identify and remediate potential negative impacts affecting its workforce and to ensure that employees can raise concerns in a secure and confidential manner. The company promotes active dialogue through **regular team meetings, social climate surveys**, and an **anonymous reporting mechanism** covering issues such as harassment, discrimination, and working conditions. When a concern is reported, the Human Resources department coordinates a confidential assessment and defines appropriate corrective measures, which may include training, reorganisation, mediation, or disciplinary action, followed by systematic monitoring to ensure their effectiveness.

Employees have access to **several internal channels to express concerns or suggestions**, including a formal alert procedure, a dedicated HR email address, an "Eureka" mailbox for improvement ideas, a GDPR contact for data protection issues, and a harassment representative within the Social and Economic Committee. These channels are accessible both digitally and on-site, and their existence is regularly communicated through induction sessions, awareness campaigns, and internal postings. All reports are handled promptly and confidentially, with appropriate feedback provided to employees.

Nactis Flavours enforces a **strict non-retaliation policy** that prohibits any adverse action against employees who raise concerns or contribute to internal investigations. This policy is embedded in the company's internal regulations and forms part of its commitment to maintaining a transparent and respectful work environment based on trust, accountability, and continuous improvement.

Nactarome NV

Nactarome NV has established internal procedures and ethical standards designed to prevent and remediate potential negative impacts on its workforce. The company's *Ethical Code of Conduct*²³ prohibits any form of discrimination, forced or child labour, unsafe working conditions, or inhumane treatment, ensuring respect for **internationally recognised labour rights and conventions**. In the event of breaches or concerns,

²³ For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

employees are encouraged to report issues such as ethical violations, conflicts of interest, or unsafe practices directly to their supervisors or to members of the management board. These channels ensure confidentiality and protect employees from retaliation, fostering a culture of transparency and trust. Reported cases are reviewed by the management board, which is responsible for follow-up actions and, when necessary, for escalating significant issues to the CEO of the company. This structure ensures that all grievances are handled fairly, promptly, and in alignment with the company's commitment to ethical conduct and the protection of workers' rights.

Royal Buisman

Royal Buisman has established structured processes and communication channels to identify, address, and remediate potential negative impacts affecting its employees and on-site contractors. The company promotes a transparent and responsible culture in which every worker can raise concerns safely and confidentially. Since June 2024, the *Whistleblowing Policy*²⁴ provides a formal, EU-compliant mechanism for reporting any suspected misconduct, harassment, discrimination, or breach of ethical, health-and-safety, or environmental standards. Reports can be submitted via the **ParrotWB online platform** or through an independent mediator, ensuring full anonymity, acknowledgment within seven days, and feedback within three months. In parallel, employees may report issues directly to their line managers, the HR department, or the QESH Manager.

When a concern is raised, a structured **remediation process** is activated, including initial assessment, root-cause analysis, and definition of corrective or preventive actions. The **HR and QESH departments** jointly monitor implementation and follow-up to ensure resolution and prevent recurrence. All cases are documented and reviewed during annual internal audits as part of the management-review cycle.

Nactarome Ltd

Nactarome Ltd has established robust processes to identify, report, and remediate potential negative impacts on workers. The *Whistleblowing Policy*²⁵ enables all employees and contractors to report concerns confidentially through internal or external channels, with oversight by the HR Manager and escalation to the Chair of the Board when required. Anonymous reporting is supported via site suggestion boxes and external advice lines such as **Protect** and the **Modern Slavery Helpline**.

Complementary policies on *Health & Safety*, *Occupational Stress*, and *Mental Health & Wellbeing* ensure that issues affecting employee well-being are addressed promptly through **internal reporting**, risk assessment, and corrective measures. These mechanisms promote transparency, protect whistleblowers, and foster a safe and supportive workplace culture.

²⁴ For further information about the policy, please see § Policies in Chapter ESRS G1 Business conduct.

²⁵ For further information about the policy, please see § Policies in Chapter ESRS G1 Business conduct.

6.1.3 Actions and targets

[S1-4] [S1-5]

Among Nactarome legal entities, multiple initiatives are being implemented to **promote employee well-being, professional growth, and equal opportunities**, while ensuring safe, fair, and inclusive working conditions. The actions undertaken by individual companies focus on strengthening occupational health and safety systems, enhancing work-life balance through flexible arrangements, and supporting both physical and mental well-being. Continuous training programmes, performance reviews, and professional development plans are in place to foster skill enhancement and career progression, with increasing participation targets set across entities. In parallel, several companies have carried out compensation benchmarking and pay equity analyses to ensure transparency, competitiveness, and internal fairness, while specific targets have been defined to reduce the gender pay gap and increase female representation in management roles. These actions are complemented by ongoing efforts to protect personal data, promote diversity and inclusion, and strengthen employee engagement through dialogue, recognition, and well-being initiatives. Together, they reflect the Nactarome's commitment to building a safe, motivated, and resilient workforce.

AromataGroup

AromataGroup places strong emphasis on the **well-being, safety, and professional development of its people**, implementing a range of initiatives designed to foster a supportive and equitable work environment.

To promote **occupational health and safety** and work-life balance, the company maintains a proactive prevention policy that integrates training, ergonomic assessments, and flexible working arrangements. Variable working hours are available across several departments, depending on the nature of the position, allowing employees to better balance personal and professional needs. In addition, a home working policy introduced in 2023 continues to provide flexibility for administrative and R&D staff. In parallel, the company is committed to the **protection of employees' personal data**, ensuring full compliance with GDPR regulations. Ongoing monitoring activities and internal control measures are in place to maintain a record of zero incidents of data leakage or loss across all employee data systems.

In 2024, AromataGroup also conducted a **comprehensive salary review and compensation survey** in collaboration with the Industrial Association to benchmark its pay practices against the local market. The results confirmed full alignment with market standards and, in some cases, higher-than-average pay levels. This initiative supports the company's objectives of motivating and retaining talent, promoting internal equity, and ensuring transparency in compensation policies. The findings will be used to inform the 2025–2026 salary review and budgeting process. To **align compensation policies with market standards**, AromataGroup aims to guarantee fair and competitive remuneration that supports employees' economic security and motivation. Following the 2024 external

compensation survey conducted in Italy, annual reviews will be carried out until 2028 to identify and correct potential discrepancies, reducing unjustified pay differences and reinforcing internal equity.

AromataGroup also pursues the objective of **reducing discrimination and the gender pay gap**, in line with European diversity and inclusion principles. The company is implementing targeted initiatives to ensure equal opportunities, aiming to progressively reduce pay disparities for equivalent positions and to increase female representation in managerial roles by 2030.

With regard to skills development, the company has set a target to ensure that **at least 80% of employees access annual training and performance review programmes** by 2026. The training plan includes soft, hard, and mandatory modules, designed to foster professional growth and alignment with the Company's strategic goals. Starting from a 60% participation rate in 2023, Aromata

is progressively harmonising job descriptions and implementing a common performance review system to achieve full integration by the target year.

Employee development continues to be a strategic focus: in 2024, a total of **123 hours of training** were delivered on **quality and food safety topics** across the three production sites, reinforcing competencies essential to product integrity and consumer trust.

Moreover, AromataGroup actively fosters **partnerships with universities, schools, and local institutions** in Lombardy to strengthen ties with the community and promote inclusion. In 2024, the company signed an agreement with a local social cooperative to support people with disabilities and began collaborating with the University of Milan (Chemistry Department) and local schools to create synergies between education and industry. These collaborations are renewed annually, reinforcing AromataGroup's commitment to the local social fabric.

IPAM

In recent years, IPAM has implemented a series of initiatives aimed at promoting employee well-being and strengthening organisational equity. Particular attention has been devoted to occupational health and safety and to work-life balance. The company has launched an **active safety and well-being plan**, especially at the Zibello site, including measures to promote both **physical and mental health**. Overtime and working hours are carefully monitored to preserve a **balanced workload**, while flexible arrangements — such as **home working**, introduced in 2024 — support inclusion and adaptability. The ongoing harmonisation process with AromataGroup and the wider Company is designed to ensure consistent working conditions, flexibility, and well-being across all entities.

IPAM invests in **training and skills development** through an annually updated plan designed to meet both strategic and operational needs. Training activities cover mandatory topics (safety, hygiene, quality) as well as soft and technical skills, and are accessible to all employees, including new hires and production staff. Learning takes multiple forms — internal and external sessions, mentoring, e-learning — and is

grounded in the principle of equal opportunity. This inclusive approach ensures that each employee can contribute to the company's growth while developing professionally in a safe and equitable workplace.

During 2024, IPAM also took part in a **compensation and benefits survey** promoted by the Industrial Association, with the goal of aligning salary practices with the food industry market. The results confirmed that **salaries** for most positions are **consistent with market standards**, and **in some cases exceed them**. This initiative allowed the company to assess competitiveness, identify areas for potential adjustment, and strengthen internal equity. The findings will inform the 2025 salary review and will serve as the basis for continuous monitoring up to 2026, reinforcing pay fairness and transparency.

Nactis Flavours

Nactis Flavours promotes a comprehensive approach to employee well-being, professional development, and equal opportunity. Its **occupational health and safety strategy** combines risk prevention, regular training, and a dedicated Quality of Working Life (QWL) plan launched in 2024, focusing on well-being, recognition, and team cohesion. Flexible working arrangements, including telecommuting and variable schedules, support a better work-life balance, while training on mental health and well-being is planned for 2025.

The company also fosters professional growth and dialogue through **structured annual performance and career development reviews**, managed since 2024 via the digital tool Javelo, which enhances traceability and alignment of objectives. In parallel, Nactis Flavours has also committed to aligning its compensation structure with market standards. Following an **external benchmark** conducted in 2024, the company will correct identified gaps between 2024 and 2025 to ensure equity and competitiveness across all functions in France and achieve a **fair and market-aligned remuneration policy**.

To strengthen **economic security and job stability**, the company aims to increase the proportion of employees on open-ended contracts to 90% by 2026, compared to a baseline of 82% in 2023, with an intermediate milestone of 88% in 2025. This target applies to all employees at the company's main site in France and reflects its long-term commitment to workforce retention and loyalty.

Improving **quality of working life** is another key objective, pursued through flexible working hours and initiatives within the QWL plan. The company's goal is to achieve an **employee satisfaction** rate of at least 85% regarding working hours in annual internal surveys, up from 78% in 2023, with progressive improvements expected over a three-year period.

The company places strong emphasis on **data protection**, maintaining a zero-tolerance objective for any incidents of data leakage or loss concerning employees' personal information. Ongoing monitoring ensures compliance with the GDPR and internal data protection policies.

As part of its **diversity and inclusion policy**, Nactis Flavours aims to reduce the gender pay gap to below 5% for equivalent positions and to increase female representation in management roles from 15% to 25% by 2026. This initiative, based on 2023 workforce data, is reviewed annually to ensure continuous progress toward equal opportunity.

Finally, in line with its HR policy promoting **continuous learning and skills development**, Nactis Flavours has set the target of achieving 100% employee access to annual training and development programmes by 2030. Starting from a baseline participation rate of 78% in 2023, the company plans to reach 85% by 2025 and 90% by 2026, with annual monitoring through HR reviews.

Nactarome Ltd

Training on occupational health and safety is a core component of the company's people management system. Through the *Mental Health & Wellbeing Policy*, included in the *Employee Handbook*, Nactarome Ltd provides **training modules** that address not only physical safety but also mental health awareness, stress prevention, and work-life balance. These programmes apply to all employees, including contractors and casual staff, and form part of the standard onboarding process. Continuous training and refresher sessions are carried out throughout the year to strengthen a culture of **well-being** and **psychological safety**. All new team members have been trained as part of the induction process, ensuring consistent awareness and engagement across the workforce.

In addition to well-being initiatives, Nactarome Ltd conducts **Performance Planning Reviews** on a biannual basis to encourage career development and continuous dialogue between employees and management. These reviews serve to assess achievements, define objectives for the following period, and identify growth opportunities in alignment with business priorities. The last review cycle will be completed in June 2025, confirming the company's ongoing commitment to structured performance management and employee engagement.

Furthermore, the company maintains high standards of occupational safety through **regular internal audits, risk assessments, and procedural reviews** conducted by the Health & Safety and Technical teams. The audits are performed on an ongoing basis across all operational areas and contribute to identifying preventive actions, improving procedures, and reinforcing a culture of continuous improvement.

6.2 Metrics

6.2.1 Characteristics of the undertaking's employees

The number of Nactarome's employees grew by 3.7% in 2024, increasing from 540 in 2023 to 560 in 2024, while gender distribution ratios remained largely unchanged over the two-year period. Men continue to represent two-thirds of the total number of employees, largely due to production roles being predominantly filled by them.

The vast majority of employees (**over 95% in both years**) are employed **on a permanent basis**, as keeping a highly skilled permanent workforce is crucial for ensuring organisational consistency. Full-time employees represented 89% of the workforce in 2023 and 91% in 2024.

The turnover rate increased over the period, rising from 14% in 2023 to 16% in 2024, mostly because of Nactis Flavours' personnel changes.

[S1-6]

The number of employees	2023	2024
Total employees, by gender	540	560
Women	185	192
	34%	34%
Men	355	368
	66%	66%

Characteristics of employees, by gender	2023	2024
Permanent employees	519	534
Women	178	186
	34%	35%
Men	341	348
	66%	65%
Fixed term employees	21	26
Women	7	6
	33%	23%
Men	14	20
	67%	77%
Full-time employees	481	513
Women	141	155
	29%	30%
Men	340	358
	71%	70%

Characteristics of employees, by gender	2023	2024
Part time employees	59	47
Women	44	37
	75%	79%
Men	15	10
	25%	21%

Employees who left the organisation	2023	2024
Total employees	540	560
Total employees who left the organisation during the reporting period	78	90
Turnover rate	14%	16%

6.2.2 Characteristics of non-employee workers in the undertaking's own workforce

The Company's reliance on **non-employee workers significantly increased in 2024**. This growth is primarily due to **Nactarome NV**, which integrated 7 non-employee workers in 2024 compared to none in 2023, whereas Calaf Nuances employed 1 more person than in the previous year.

The overall increase is largely driven by a rise in **temporary agency workers**, whose number grew from 1 in 2023 to 6 in 2024, reflecting greater reliance on third-party providers to address short-term labour needs, linked to operational peaks or specific projects. Moreover, the new category of contractors was introduced in 2024, with 2 workers representing the formal outsourcing of tasks or services that were previously managed internally or newly required.

[S1-7]

Characteristics of non-employee workers	2023	2024
Total number of non-employees in the own workforce	13	21
Self-employed	4	5
	31%	24%
Temporary agency worker	1	6
	8%	29%
Contractors	0	2
	0%	10%
Consultant	3	3
	23%	14%
Agents	3	2
	23%	10%
Business Development Representative (BDR)	2	3
	15%	14%

6.2.3 Collective bargaining coverage and social dialogue

Collective bargaining agreements cover 100% of employees working in the countries where such arrangements are more common. Hence, exceptions arise only to Nactarome Ltd, which does not have a collective bargaining agreement as the local legal entities from which it originated — Create Flavours and Taste Connection — were of limited size prior to their merger into Nactarome, and to Royal Buisman, which maintains its own separate agreement.

[S1-8]

Collective bargaining agreements	2023	2024
Total number of employees	540	560
Employees covered by collective bargaining agreements	434	450
	80%	80%
Employees covered by collective bargaining agreements within the EEA ²⁶	429	444
	79%	79%

6.2.4 Diversity metrics

The age composition of the workforce shows a **moderate shift towards younger employees**. The proportion of employees under 30 years old increased from 14% in 2023 to 17% in 2024, reflecting higher recruitment in entry-level positions. Therefore, the share of workers aged 30 to 50 years old and over 50 experienced a minor decrease due to workforce growth being concentrated in the youngest segment.

The people in the governance structure of Nactarome's legal entities decreased from 52 in 2023 to 46 in 2024, mainly driven by a change within AromataGroup, where the number of top management members declined from 13 to 8, reflecting the transfer of 5 individuals from AromataGroup S.r.l. to the Holding Nactarome S.p.A. as of January 1, 2024. The gender distribution in Nactarome governance structure reflects that of the Company's workforce: in both years, women were about 30% and men 70%.

[S1-9]

Total number of employees, by age	2023	2024
Total number of employees	540	560
Under 30 years old	73	97
	14%	17%
30-50 years old	255	254
	47%	45%
Over 50 years old	212	209
	39%	37%

²⁶ The EEA is the European Economic Area.

Diversity among the members of legal entities' governance structure	2023	2024
Total top management level members	52	46
Women	15	14
	29%	30%
Men	37	32
	71%	70%

6.2.5 Social protection

All Nactarome employees are covered by social protection in both 2023 and 2024, reflecting full compliance with statutory and company-level social protection policies.

Among non-employees, coverage increased substantially, with 12 individuals covered in 2024 compared to 5 in 2023. Correspondingly, the share of non-employees not covered by social protection decreased, reflecting the company's ongoing efforts to extend social protection measures beyond its core workforce.

[S1-11]

Employees covered by social protection	2023	2024
Number of employees covered by social protection	540	560
	100%	100%
Number of non-employees covered by social protection ²⁷	5	12
	45%	63%
Number of non-employees not covered by social protection	6	7
	55%	37%

6.2.6 Persons with disabilities

In 2024, the number of employees belonging to Protected Categories remained **a consistent 3% of the total workforce**. The actual number decreased from 17 to 14 because of AromataGroup and Nactis Flavours' figures, which show a decline in women and a slight increase in men.

²⁷ The data about non-employees do not include Nactis Flavours.

[SI-12]

Vulnerable categories	2023	2024
Total number of employees	540	560
Employees belonging to Protected Categories	17	14
	3%	3%
Women	9	5
	53%	36%
Men	8	9
	47%	64%

6.2.7 Training and skills development metrics

In 2024, Nactarome strengthened its **focus on performance and career development reviews**, resulting in a notable increase in employee engagement. Overall, the participation rate rose from 74% in 2023 to 86% in 2024, reflecting growing engagement in the process. This improvement was particularly evident among women, whose participation increased from 73% to 87%, while male participation also rose from 74% to 85%. The number of performance reviews per employee remained stable at one per year, with the exception of Nactarome Ltd where two performance reviews per employee are conducted annually. Overall, the total number of reviews agreed upon by management increased from 523 to 543, reflecting the Company's increase in staff and its ongoing efforts to monitor and support employee performance.

Total training hours increased by over 16%, going from 4,681 in 2023 to 5,441 in 2024. In 2024, in preparation for AromataGroup's acquisition of IPAM, the HR department of the first company also assumed responsibility for IPAM employees, enabling the implementation of a structured training plan across both companies and contributing to deliver higher total training hours. In the two-year period 2023-2024, the average training hours per employee increased from 9 to 10.

[SI-13]

Employees receiving performance and career reviews	2023	2024
Total number of employees	540	560
Employees participating in regular performance and career development reviews	399	483
	74%	86%
Women	135	167
	73%	87%
Men	264	316
	74%	86%

Number of performance review	2023	2024
Minimum number of performance reviews per employee	1	1
Total number of reviews agreed upon by management	523	543

Average number of hours of training, by gender	2023	2024
Total number of training hours	4,681	5,441
Women	1,523	1,428
Men	3,159	4,013
Average number of training hours	9	10
Women	8	7
Men	9	11

6.2.8 Health and safety metrics

In both 2023 and 2024, 100% of the Company's own workforce was covered by a health and safety management system. The number of recordable work-related accidents remained broadly stable, increasing only slightly from 29 cases in 2023 to 30 cases in 2024, which corresponds to a reduction in the rate of recordable work-related accidents from 33.88 to 30.46 due to the increase in the number of hours worked. In addition, the number of cases of recordable work-related ill health, where legally reportable, decreased from 7 cases in 2023 to 5 cases in 2024. Despite this, the total number of days lost due to work-related injuries and work-related ill health decreased from 195 days in 2023 to 112 days in 2024, which proves that the accidents occurred were minor.

The legal entities continue to monitor the effectiveness of their health and safety management systems and are implementing targeted preventive measures and training initiatives to address recordable accidents and ill-health cases, with the objective of strengthening their safety performance and further reducing work-related risks.

[SI-14]

Work-related injuries for employees	2023	2024
Total number of own workers	540	560
Number of hours worked by own workers	856,085.39	984,877.37
Number of people covered by health and safety management system	540	560
	100%	100%

Work-related injuries for employees	2023	2024
Number of fatalities of own workers due to work-related injuries ²⁸	0	0
Number of fatalities of own workers due to work-related illnesses	0	0
Number of fatalities of other workers working at the company's sites due to work-related injuries and illnesses	0	0
Number of recordable work-related accidents	29	30
Rate of recordable work-related accidents	33.88	30.46
Number of cases of recordable work-related ill health, subject to legal restrictions on the collection of data	7	5
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health for own employees ²⁹	195	112

Number of work-related cases and days lost	2023	2024
The number of cases involving work-related diseases that can be recorded, subject to legal restrictions on the collection of data from non-employees	0	0
The number of days lost due to injuries and deaths at work due to accidents at work, work-related illnesses and deaths as a result of illnesses of non-employees	0	0

6.2.9 Work-life balance metrics

Parental support was consistent across the organisation; parental leave is taken by both men and women. All employees are entitled to it, and the number of employees who actually took parental leave increased from 30 in 2023 to 46 in 2024, reflecting the growth of the overall workforce. Nactarome is committed to flexibility and respect for employees' personal and family needs and, as an example, at Nactis Flavours, employees do not have to notify the HR department of their maternity or paternity leave well in advance.

[S1-15]

Parental leave	2023	2024
Total number of employees	540	560
Employees entitled to parental leave for family reasons	540	560
	100%	100%
Eligible employees who have taken leave for family reasons, by gender:	30	46
	6%	8%
Women	15	21
	3%	4%
Men	15	25
	3%	4%

²⁸ The following 2023 data do not include Royal Buisman: number of fatalities of own workers due to work-related injuries and illnesses, number of fatalities of other workers operating at the company's sites, number and rate of recordable work-related accidents, number of cases of recordable work-related ill health, and number of days lost due to work-related injuries and ill health.

²⁹ The 2023 data do not include Nactarome Ltd.

6.2.10 Compensation metrics (gender pay gap and total compensation)

In 2024, the gender pay gap continues to represent a key area of focus for the Company, remaining at 35% and reflecting the difference between average hourly earnings for men and women. Regarding internal pay equity, the total annual rate of remuneration increased from 2.44 in 2023 to 2.59 in 2024, reflecting a slight decrease in the annual remuneration of the highest-paid individual alongside an increase in the median annual remuneration for all employees, indicating a marginal narrowing of internal pay disparity.

[SI-16]

Gender pay gap	2023	2024
Average hourly earnings of male employees in euro	30.28	31.26
Average hourly earnings of female employees in euro	19.81	20.40
Gender pay gap	35%	35%

Total remuneration	2023	2024
Annual total remuneration ratio of the highest paid individual in euro	148,392.67	147,436.97
Median annual total remuneration for all employees (excluding the highest-paid individual) in euro	57,403.10	60,481.63
Total annual rate of remuneration	2.44	2.59

6.2.11 Incidents, complaints and severe human rights impacts

Nactarome opposes all forms of discrimination, harassment and inequality, striving to create a workplace where employees can thrive. **As in 2023, no incidents of discrimination, complaints, or serious human rights impacts were reported in 2024,** and no related fines or penalties were incurred. This outcome highlights the Company's continued commitment to human rights and a respectful and inclusive workplace.

[SI-17]

Incidents, complaints and severe human rights impacts	2023	2024
Total number of incidents of discrimination, including harassment	0	0
Number of complaints filed through channels for people in the undertaking's own workforce to raise concerns (including grievance mechanisms)	0	0
Where applicable, the number of complaints lodged to the OECD's National Contact Points for Multinational Enterprises, excluding incidents already reported in the previous datapoint	0	0
Total amount of fines, penalties and compensation for damage as a result of the incidents and complaints disclosed above, in euro	0	0
Number of serious human rights incidents connected to the undertakings' workforce in the reporting period	0	0
Total amount of fines, penalties and compensation for damages for serious human rights incidents, in euro	0	0

7. ESRS S2 Workers in the value chain

7.1 Impact, risk and opportunity management

[SBM-3]

Nactarome manages its relationships with value chain workers through responsible procurement practices and supplier engagement processes designed to ensure compliance with ethical, social, and environmental standards. Supplier selection and monitoring are conducted through structured qualification procedures, supplier codes of conduct, and performance evaluations. These mechanisms help mitigate risks related to labour conditions, human rights violations, and non-compliance in the supply chain, while promoting transparency and long-term collaboration with responsible business partners. This approach supports Nactarome's broader commitment to sustainability and value chain integrity.

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
S2 Workers in the value chain	Working conditions	<ul style="list-style-type: none"> - Secure employment - Working time - Adequate housing - Social dialogue - Freedom of association, the existence of works councils and the information, consultation and participation rights of workers - Collective bargaining, including rate of workers covered by collective agreements - Work-life balance 	Violation of labour-related rights of workers in the value chain		

To date, only the information made available by the legal entities has been included in this section. As a result, certain ESRS S2 disclosures — specifically those relating to engagement processes, remediation processes, actions, and targets — are not yet reported due to the absence of underlying data. Nactarome has launched a multi-year programme to progressively achieve full alignment with ESRS requirements in future Sustainability Statements.

7.1.1 Policies

[S2-1]

Across the legal entities within Nactarome, responsible labour practices and respect for human rights are promoted throughout the value chain. While the Company does not have a single policy at consolidated level, each entity integrates social and ethical commitments into its **supplier management and procurement frameworks**, ensuring that partners operate according to principles of fairness, transparency, and worker protection. AromataGroup, IPAM, and Calaf Nuances embed these principles in their *Codes of Ethics* and supplier engagement processes, encouraging alignment with international labour standards and safe working conditions. Nactis Flavours and Nactarome NV formalize similar expectations through their *Supplier Codes of Ethics* and related policies, promoting continuous improvement and compliance with health, safety, and human rights requirements. Royal Buisman reinforces this commitment through its *Supplier Code of Conduct*³⁰ and supplier evaluation mechanisms that monitor adherence to ethical and social standards. Nactarome Ltd has adopted a particularly structured approach, with dedicated policies such as the *Modern Anti-Slavery Policy* and the *Child Labour Policy*, which establish clear governance, due diligence, and remediation procedures to prevent labour exploitation and protect vulnerable groups. Collectively, these frameworks demonstrate Nactarome's commitment to fostering a responsible, transparent, and fair value chain that safeguards the rights and well-being of all workers.

AromataGroup

AromataGroup promotes fair and responsible labour practices throughout its value chain, extending its ethical and social commitments to suppliers and external partners. The company's **Code of Ethics**³¹ sets expectations regarding respect for human rights, health and safety, and ethical behaviour, in line with international standards. Through its procurement procedures and continuous supplier dialogue, AromataGroup encourages partners to align with principles of fairness, transparency, and worker well-being.

IPAM

IPAM is committed to promoting responsible labour practices across its supply chain, ensuring that social and ethical considerations are embedded in procurement and partnership decisions. The company embeds ILO standards on integrity, fairness, and health and safety in its **Code of Ethics**³², encouraging suppliers and contractors to uphold similar values and to provide safe and respectful working environments for their employees.

³⁰ For further information about the codes mentioned so far, please see § Policies in Chapter ESRS G1 Business conduct.

³¹ For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

³² For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

Calaf Nuances

Calaf Nuances integrates **social responsibility and respect for workers' rights** into its business relationships with suppliers and contractors. The company promotes ethical behaviour, compliance with labour laws, and safe working conditions along the supply chain. Through its attention to responsible sourcing and traceability, Calaf Nuances contributes to ensuring that workers in the value chain are treated with dignity and fairness.

Nactis Flavours

Nactis Flavours supports fair labour conditions within its value chain through the implementation of its **Quality, Health, Safety, Environment & Corporate Social Responsibility Policy**³³ and especially the *Supplier Code of Ethics*³⁴. These frameworks define expectations for suppliers regarding the protection of human rights, health and safety, and ethical conduct. The company promotes continuous improvement and responsible sourcing practices to ensure that all workers in its value chain are treated ethically and in accordance with international standards.

Nactarome NV

Nactarome NV extends its commitment to social responsibility to its relationships with suppliers and contractors. The company encourages compliance with ethical, health, and safety standards and promotes transparent and fair collaboration across its value chain. Through the **Supplier Code of Conduct**³⁵ and procurement oversight, Nactarome NV contributes to ensuring that workers throughout its supply network operate under safe, fair, and lawful conditions.

Royal Buisman

Royal Buisman promotes responsible and ethical practices across its supply chain to safeguard the rights and well-being of workers. The **Supplier Code of Conduct**³⁶, introduced in 2024, requires all key suppliers of raw materials, packaging, and services to commit to social and ethical principles aligned with international labour standards. Annual supplier evaluations ensure compliance with these requirements, while the company's whistleblowing procedure offers an independent and confidential channel for external workers and suppliers to report concerns. Through these mechanisms, Royal Buisman fosters transparency, accountability, and respect for human rights throughout its value chain.

³³ For further information about the policy, please see § Policies in Chapter ESRS S4 Consumers and end-users.

³⁴ For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

³⁵ For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

³⁶ For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

Nactarome Ltd

Modern Anti-Slavery Policy

The *Modern Anti-Slavery Policy* sets out the company's **zero-tolerance stance toward slavery and human trafficking**, confirming its commitment to preventing these practices within both its own operations and its supply chain. The policy's objectives are operationalised through concrete measures, including mandatory employee awareness initiatives — supported by the inclusion of the policy in the *Employee Handbook* and the requirement for all staff to acknowledge having read and understood it — and a robust **due diligence process for suppliers** at onboarding and during the relationship. This process assesses suppliers' compliance with legal, health, safety, and ethical standards, applying corrective actions or termination in cases of non-compliance. The policy also promotes the use of the company's *Whistleblowing Policy*³⁷, which offers employees, customers and suppliers a confidential channel to report any suspicions of slavery or trafficking. The **Managing Director** and the senior management team are responsible for implementation and oversight. The policy applies to all operations of Nactarome Ltd and to suppliers located primarily in the UK and Europe. While the policy is not publicly disclosed, it is accessible to employees, customers, and suppliers, reflecting a relationship of trust and integrity built on shared ethical principles.

Child Labour Policy

The *Child Labour Policy* further strengthens Nactarome Ltd's commitment to protecting human rights by explicitly prohibiting any form of child labour within its supply chain. The policy's general objective is to ensure that no products or raw materials supplied to the company are produced through the use of child labour. Based on the **UN Convention on the Rights of the Child (1989)** and the **ILO Conventions No. 138 (Minimum Age)** and **No. 182 (Worst Forms of Child Labour)**, the policy establishes clear expectations for suppliers and subcontractors to prevent child labour, maintain reliable age-verification records, communicate the policy to their workers, and cooperate with inspections or third-party audits. A **remediation mechanism** is also foreseen, focused on protecting the best interests of the child through corrective action plans developed in collaboration with suppliers, NGOs, and, where possible, the children themselves. The policy applies across all geographies and supplier tiers where Nactarome Ltd operates or sources materials, without exclusions. **Oversight** is exercised at management level, with the company retaining the right to verify supplier compliance directly or through independent third parties. The policy reflects the company's consideration of children's rights, ensuring that in any remediation process their views are respected and their access to education safeguarded. It is communicated to all suppliers and subcontractors through the **General Purchasing Conditions**, which formalize compliance obligations and monitoring rights.

³⁷ For further information about the policy, please see § Policies in Chapter ESRS G1 Business conduct.

8. ESRS S4 Consumers and end-users

8.1 Impact, risk and opportunity management

[SBM-3]

Nactarome ensures that consumers and end-users are protected from potential negative impacts through robust product quality, safety, and complaint management systems. The Company engages actively with customers to collect feedback, manage non-conformities, and implement corrective actions using digital platforms and structured quality management frameworks. These systems ensure transparency, traceability, and continuous improvement of food safety and product performance. Engagement processes also support responsible communication and foster trust, ensuring that consumer expectations are addressed and that risks are managed effectively across all entities.

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
S4 Consumers and end-users	Information-related impacts for consumers and/or end-users	Privacy	Violation of consumer privacy rights due to data leakage and/or data loss		
S4 Consumers and end-users	Personal safety of consumers and/or end-users	- Health and safety - Security of a person	Protection of customer health and safety through compliance with food quality standards	Sanctions and reputational damage due to non-compliance of products with hygiene and food safety regulations (e.g. HACCP)	
S4 Consumers and end-users	Social inclusion of consumers and/or end-users	Non-discrimination	Access to products and services for all customer categories (with religious constraints, vegetarians, vegans)		

ESRS S4 does not prescribe metrics, therefore this chapter does not include them.

8.1.1 Policies

[S4-1]

Ensuring product quality and safety is a shared priority across the Nactarome legal entities, reflected in **a robust framework of policies and certified management systems adopted by each entity**. All companies operate in compliance with internationally recognised standards such as *FSSC 22000*, *ISO 9001*, and *BRC*, ensuring the consistent delivery of safe, high-quality products that meet customer and regulatory expectations. AromataGroup, IPAM, and Calaf Nuances have established integrated *Quality and Food Safety Policies* that promote continuous improvement, risk prevention, and full traceability along the value chain, supported by employee training and HACCP-based controls. Nactis Flavours integrates food safety within its broader *QHSE & CSR Policy*, reinforcing a culture of responsibility, transparency, and stakeholder engagement. Nactarome NV and Royal Buisman ensure business continuity and consumer protection through certified management systems and preventive measures that address both operational and food safety risks. Nactarome Ltd complements this approach through its comprehensive certification framework (i.e., *BRC Grade A* and *FSSC 22000*) and its commitment to inclusivity via *Kosher* and *Halal* standards. Collectively, these policies embody Nactarome's dedication to protecting consumer health, ensuring product integrity, and maintaining trust through excellence, accountability, and compliance across all its operations.

AromataGroup*Quality and Food Safety Policy (ISO 9001, FSSC 22000)*

AromataGroup has adopted a comprehensive *Quality and Food Safety Policy* to ensure the highest standards of product safety, quality, and reliability across all operations. The policy aims to achieve continuous improvement and innovation, focusing on **customer satisfaction, product and process hygiene, and compliance with national and international food safety standards**. Key objectives include maintaining and enhancing the effectiveness of the Food Safety Management System, promoting a strong culture of quality and food safety, and ensuring compliance with the *Code of Ethics*³⁸, which upholds respect for health, safety, and human dignity.

Main **food safety risks** addressed include contamination (foreign bodies, chemical, allergenic), temperature control, and traceability of raw materials and production processes. **Opportunities** arise from customer loyalty, business continuity, and enhanced corporate reputation through the consistent delivery of safe, high-quality products.

Risk management actions include:

- staff training and awareness;
- inspection of incoming raw materials;
- planned equipment maintenance;

³⁸ For further information about the code, please see § Policies in Chapter ESRS G1 Business conduct.

- product controls during production and before release;
- HACCP plan;
- digital non-conformity management with corrective and preventive actions;
- product recall procedures in case of safety risks.

The policy applies to AromataGroup and covers the entire production value chain — from **upstream procurement** (supplier qualification and monitoring) to **downstream customer delivery**, ensuring reliability, safety, and traceability at every stage. It applies to the production and distribution of flavours, extracts, colourings, functional ingredients, breadcrumbs, and coating products for the Food & Beverage industry and retail channels across European markets.

Stakeholders involved include **customers, employees, suppliers, supervisory authorities, investors, and certification bodies**.

The **Legal Representative** holds ultimate responsibility for food safety. Operational accountability is shared among Production Management, Quality Assurance, Quality Management, and Maintenance.

AromataGroup complies with *ISO 9001* and *FSSC 22000* standards (Concorezzo, Gessate, and Vanzago sites) and relevant national and international legislation.

The policy was developed with attention to the needs of customers, suppliers, and regulatory bodies. Effective communication and collaboration throughout the supply chain are essential to ensuring consistent quality and food safety. Employees are continuously trained and informed about updates to the policy and the Food Safety Management System.

Procedure – Management of Critical Product Non-Conformities, Emergencies, and Product Recall

This procedure governs the management of **critical technical or legal non-conformities** related to product safety and quality. It defines the roles and responsibilities of the Crisis Committee, the conditions for initiating product recalls, and the process for communication with stakeholders and authorities.

It ensures the **identification, traceability, segregation, and recall** of non-conforming products and provides guidance for handling **customer damage claims**. The procedure's effectiveness is verified through **annual recall simulations** conducted by the Crisis Committee.

The procedure applies to **all AromataGroup sites**, involving internal functions (Crisis Committee, Quality Assurance, Technical Direction, Maintenance) and external stakeholders (customers, suppliers, supervisory authorities).

The **Crisis Committee**, composed of corporate and site management representatives, is responsible for decision-making on product recalls and for managing all external communications.

The procedure's external references are:

- Regulation (EC) No. 178/2002 – obligations for market withdrawal of unsafe food;
- RASFF alert notifications management;
- DNV Certification Body requirements (Part 3, point 11);
- GDPR compliance for data protection.

The procedure's primary aim is to protect consumer health and safety. It ensures rapid and transparent communication with **customers, authorities, and certification bodies** in case of recall or product risk.

IPAM

Quality and Food Safety Policy

IPAM's approach to product quality and food safety is governed by an integrated system of policies and procedures aimed at ensuring compliance, continuous improvement, and full customer satisfaction. The *Quality and Food Safety Policy* establishes the company's commitment to delivering products that meet the **highest standards of quality and safety**, in full respect of mandatory legislation and customer requirements. It applies to all activities related to product development, production, and packaging for the food industry, catering, and large-scale distribution in Italy and Europe. The policy also promotes a strong internal culture of quality, supported by the continuous maintenance and improvement of the Food Safety Management System (SGSA), regular monitoring of customer satisfaction, and the systematic definition and review of quality objectives. The CEO formally endorses the policy, while the Quality Assurance Representative ensures its implementation and periodic verification. The document is made accessible to all employees via departmental noticeboards.

Finally, IPAM continuously monitors **customer satisfaction and service quality** through indirect indicators such as client retention, the number and type of complaints received, and the company's compliance with service-level expectations. This integrated system ensures that quality and safety are not only compliance requirements but also key levers for trust, competitiveness, and long-term value creation for consumers and end-users.

Calaf Nuances

Quality, Environmental and Food Safety Policy

Calaf Nuances has implemented an integrated *Quality, Environmental and Food Safety Policy* designed to ensure that all its activities — from product design to production and delivery — meet the highest standards of **quality, food safety, and environmental responsibility**. The policy reflects the company's mission to provide the food industry with safe, high-quality, and environmentally respectful flavouring solutions.

The policy sets out key objectives, including: maintaining and improving quality, safety, and environmental management systems; promoting innovation and effective communication; preventing pollution; improving waste and effluent management;

reducing food waste; and fostering a culture of food safety and continuous improvement. Specific attention is also dedicated to maintaining product quality and integrity under **Halal and Kosher certifications**.

ISO 9001, ISO 14001 and FSSC 22000

To achieve these objectives, the company follows **internationally recognised management system standards** — *ISO 9001* (Quality Management), *ISO 14001* (Environmental Management), and *ISO 22000 / FSSC 22000* (Food Safety Management) — ensuring compliance with legal requirements and best industry practices. These systems are periodically reviewed by management, which assumes ultimate responsibility for their effectiveness and for setting annual improvement targets.

The policy applies to **all Calaf Nuances' activities** and to all employees involved in the value chain. It is made accessible to internal and external stakeholders — including employees, customers, suppliers, and certification bodies — through physical display at company facilities, publication on the corporate website, and electronic distribution upon request, reinforcing transparency and stakeholder engagement in quality and food safety performance.

Nactis Flavours

Quality, Health, Safety, Environment & Corporate Social Responsibility Policy

Nactis Flavours has adopted a comprehensive *QHSE & CSR Policy* (in French “Politique Qualité, Sécurité des Aliments, Santé au travail, Environnement, Engagement sociétal”) that defines the company’s strategic priorities with regard to quality, food safety, occupational health, environmental protection, and social responsibility. The policy emphasizes **employee protection** through respect, prevention of occupational risks, and continuous training, while ensuring the highest standards of **product quality and authenticity** through the maintenance of *FSSC 22000* certification and the continuous improvement of HACCP systems. It also commits to high levels of **customer satisfaction**, responsiveness, and industrial performance through process optimisation, ERP deployment, and investments in safety and environmental protection. **Environmental management** is an integral part of the policy, supported by *ISO 14001* certification and systematic control of emissions, waste, water, and energy consumption.

The policy applies to all Nactis Flavours operations, including its main production sites in Yssingeaux and Morangis, and extends to clients, suppliers, and distributors across the value chain. It is signed and endorsed by the **General Manager**, who holds ultimate accountability for implementation. The company aligns its commitments with third-party standards such as *FSSC 22000* and *ISO 14001* and integrates **stakeholder expectations** through regular communication, team engagement, and transparent customer dialogue. The policy is made available to all employees and stakeholders via display on site and on the company SharePoint, ensuring visibility and shared responsibility for its execution.

Quality Management Manual

Foodtaste-Savor, part of Nactis Flavours, has formalised its quality approach through a *Quality Management Manual* that reflects its commitment to delivering **tailor-made**

solutions to customers in compliance with **strict quality and environmental standards**. The manual defines objectives for continuous improvement, food safety, and sustainability, supported by certifications such as *FSSC 22000*, *IFS Broker*, *MSC*, *Organic (FR-BIO-09)*, and *Halal*, which ensure compliance with international requirements and customer expectations.

The policy applies to all trading and processing activities related to **marine and plant-based products**, including the sourcing, blending, and packaging of certified raw materials. It explicitly incorporates responsible sourcing practices based on annual fishing quotas to protect marine biodiversity. The **Managing Director** is accountable for its implementation, supported by the QHSE and Site Manager, ensuring full alignment with regulatory and customer requirements. The manual is displayed at the company's premises and serves as a reference for employees and partners, ensuring the consistent application of food safety and quality principles throughout operations and across the value chain.

Nactarome NV

Contingency Policy

Nactarome NV has established a *Contingency Policy* aimed at ensuring **business continuity** and maintaining **food safety** under all operational circumstances. The policy focuses on managing risks associated with operational disruptions and emergencies, including external crises, food defence events, supply interruptions, and malicious threats. Monitoring and verification are conducted through compliance with the *FSSC 22000* international standard, complemented by risk assessments, crisis management manuals, and dedicated internal procedures. The policy applies to the company's **production activities**, as well as to **upstream** suppliers and **downstream** customer communication processes. Local directors oversee its implementation, while top management ensures that preventive and corrective actions are effectively integrated into daily operations.

Quality Policy

Through its *Quality Policy*, Nactarome NV aims to ensure the satisfaction of its customers by delivering products and services that meet the **highest quality and food safety standards**. The policy applies to **all operational stages** — from product development and production to packaging, warehousing, and sales — covering hydrolysed vegetable proteins, thermal processed flavours, and culinary blends for the food industry. It ensures compliance with all relevant legal, environmental, and food safety requirements, while fostering continuous improvement in customer satisfaction. The main stakeholders affected by this policy are **employees, suppliers involved in production, and customers**. Implementation is overseen by top management, which guarantees the necessary resources and communication channels to maintain the effectiveness of the integrated management system, certified under *FSSC 22000* and aligned with applicable **ILO** and **UN Ethical Trade** principles.

Royal Buisman

Food Safety & Quality Policy

Royal Buisman safeguards consumer health and product integrity through its certified **Food Safety and Quality Management System**, compliant with *FSSC 22000*, *ISO 9001*, and EU food-hygiene and contact-material regulations (Reg. 852/2004 and 1935/2004). The system applies to **all production processes and products** and is overseen by the **Managing Director** and the **QHSE Manager**. Preventive controls based on HACCP principles, supplier approval, traceability tests, and internal audits ensure that all products meet legal and customer food-safety requirements. The policy is displayed on site and shared with customers upon request, reaffirming Royal Buisman's commitment to safety, quality, and accountability across its value chain.

Nactarome Ltd

Nactarome Ltd has established a robust policy and governance framework to ensure the protection, health, and satisfaction of consumers and end-users through strict adherence to internationally recognised food safety, quality, and ethical standards. The company operates under a comprehensive **food safety and quality management system** aligned with *BRC Grade A* and *FSSC 22000* certification requirements, which govern the entire production chain — from raw material sourcing to final product delivery. These certifications reflect a strong commitment to maintaining the **highest standards** of hygiene, traceability, allergen management, and risk prevention across all operations, supported by continuous monitoring, internal audits, and third-party assessments. Preventive and corrective actions are implemented promptly whenever deviations are identified.

Nactarome Ltd also holds *Kosher* and *Halal* certifications, ensuring compliance with the **cultural and religious requirements of specific market segments** and reinforcing transparency and trust in customer relationships. In addition, the Alderley Park site is approved by **Marks & Spencer (M&S)** for the **direct supply of ingredients considered high-risk**, such as meat, cheese, herbs, spices, and related blends. The scope of M&S approval focuses primarily on food safety and compliance management systems, as M&S relies on **supplementary statements** and **SMETA audits** to meet its broader ethical and environmental expectations. Inclusion on the M&S “A List” — typically reserved for suppliers with demonstrated demand and strong performance — was granted to Nactarome Ltd due to its existing role in supplying seasonings for KP Snacks, which was integrated into M&S supply requirements at the time the list was introduced.

Supplier approval by M&S is based on overall performance, including product quality, ethical standards, and compliance with all relevant M&S Codes of Practice. Nactarome Ltd's consistently **strong supply record** positions the company favourably, and while formal reporting is not routinely required, it has been requested. As part of the approval framework, the company undergoes **two rotational food-related audits per year** — a Food Safety audit in year one and a Food Integrity audit in year two. The Food Safety audit builds on the **BRCGS standard** and evaluates all aspects of food safety management, process control, allergen prevention, and issue mitigation. The Food Integrity audit assesses raw material risks, supplier controls, site-level risk management,

and vulnerabilities ranging from accidental errors to deliberate actions such as substitution or fraud. Additionally, a **SMETA audit** is required every three to four years. This structured system ensures that Nactarome Ltd maintains a high level of assurance regarding consumer protection, ethical practice, and supply chain integrity.

8.1.2 Processes for engaging with consumers and end-users about impacts

[S4-2]

Nactarome maintains **structured and proactive engagement processes with consumers, end-users, and B2B customers** to ensure product safety, quality, and sustainability. Across all legal entities, feedback mechanisms — including complaint management systems, audits, customer surveys, technical support, and direct communication channels — enable concerns and suggestions to be collected, assessed, and addressed systematically. These processes are integrated within certified quality and food safety management systems, providing a robust framework for traceability, compliance, and continuous improvement. Engagement with end-users occurs primarily indirectly through B2B customers whose audits, specifications and feedback reflect end-user expectations regarding safety, allergen control, labelling and dietary inclusivity. Through this structured dialogue, Nactarome ensures transparency, responsiveness, and trust, while incorporating consumer and customer insights into ongoing product development, innovation, and improvement initiatives.

AromataGroup

AromataGroup maintains structured processes for engaging with customers and end-users, primarily through the **management of non-conformities** and **continuous improvement initiatives**. In addition, **feedback from clients** is systematically collected and analyzed as part of the company's quality and food safety management systems. Through these mechanisms, AromataGroup ensures that **concerns and suggestions from consumers and business partners are appropriately addressed**, contributing to the ongoing enhancement of its products and services.

IPAM

In terms of stakeholder engagement, IPAM maintains active communication with customers, suppliers, certification bodies, and health authorities. Customers can **raise concerns or report non-conformities** directly through the **sales network or customer service**, and are assured that each case triggers appropriate corrective and improvement actions. Complaint management is also integrated into the broader food safety system, with outcomes monitored through periodic HACCP and management reviews. Internally, employees are kept informed of their roles and responsibilities through documented workflows and digital communication channels.

Calaf Nuances

Calaf Nuances maintains an ongoing dialogue with its customers and end-users through **transparent communication channels** based on mutual trust, with the aim of ensuring the quality, safety, and sustainability of its products. The company promotes innovation and continuously adapts its flavours and industrial solutions to market needs, **integrating customer feedback and requests** into its quality and food safety improvement processes. The *ISO 9001*, *ISO 14001*, and *FSSC 22000* certifications, together with *Halal* and *Kosher* certifications, support a structured approach to quality management and traceability, fostering proactive engagement with customers on environmental and food safety impacts.

Nactis Flavours

Nactis Flavours maintains an ongoing and structured dialogue with its customers to ensure that its products meet the highest standards of safety, quality, and sustainability. Engagement with consumers and end-users takes place primarily through the company's **food safety management system**, which is based on *FSSC 22000* certification and supported by **regular external audits** and **customer feedback mechanisms**. These audits provide opportunities to discuss and address potential impacts related to product safety, ingredient transparency, and environmental performance. In addition, the company's technical and sales teams maintain **close contact with clients** to co-develop flavour solutions aligned with customer needs and regulatory expectations. Customer satisfaction and complaint trends are monitored to identify recurring issues and define corrective actions, contributing to continuous improvement. Through these processes, Nactis Flavours ensures transparent communication, responsiveness, and mutual trust with its customers while promoting responsible product innovation.

Nactarome NV

Nactarome NV maintains continuous engagement with its customers through quality and food safety management systems designed to ensure transparency, compliance, and trust. The company's *Quality Policy* and certification under the *FSSC 22000* standard provide a structured framework for interaction with consumers and end-users, ensuring that **feedback, complaints, and audit outcomes** are used to monitor and improve performance. Regular external audits under *FSSC 22000*, as well as specific *Halal* and *Kosher* certifications conducted upon customer request, serve as formal engagement mechanisms to align production processes with client expectations and regulatory requirements. Through these processes, Nactarome NV ensures that consumer needs and safety concerns are systematically addressed and integrated into continuous improvement actions, reinforcing its commitment to delivering safe, high-quality products that meet or exceed stakeholder expectations.

Royal Buisman

Royal Buisman maintains an ongoing and structured dialogue with its B2B customers to ensure transparency and trust regarding the quality, safety, and sustainability of its products. Engagement processes include the **annual HACCP review**, the provision of **product specification sheets and certification documents** upon request, and direct communication between the **Quality Assurance team** and customers to address specific technical or regulatory inquiries. The company also operates a **certified food safety management system (FSSC 22000)**, under which customer feedback and audit results are systematically reviewed as part of the continuous improvement process. Through these mechanisms, Royal Buisman actively gathers input on product performance, safety expectations, and compliance requirements, ensuring that its operations align with client needs and with broader food-safety and sustainability objectives. This structured engagement supports continuous improvement and strengthens long-term customer relationships.

Nactarome Ltd

Nactarome Ltd maintains continuous engagement with its customers and end-users through **structured quality management and communication processes** designed to ensure product safety, compliance, and satisfaction. As part of its *BRC Grade A, FSSC 22000, Kosher, and Halal* certifications, the company conducts regular customer feedback assessments, product quality reviews, and audits that include discussions on potential health, safety, and ethical impacts. Dedicated **technical and commercial teams** work closely with clients to address formulation requirements, allergen management, and labelling expectations, ensuring transparency and traceability throughout the value chain. These engagement processes enable Nactarome Ltd to gather insights on emerging consumer needs, evaluate product performance, and jointly define improvement actions with customers, strengthening trust and long-term relationships.

8.1.3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

[S4-3]

Nactarome has implemented **well-defined procedures to detect, manage, and resolve potential adverse impacts on consumers and end-users**, emphasizing product quality, safety, and compliance with regulations. Throughout all legal entities, customer complaints, non-conformities, and feedback are consistently captured, evaluated, and tracked using digital tools and integrated quality management systems. Corrective and preventive actions are implemented under the oversight of dedicated Quality Departments, ensuring accountability, traceability, and timely resolution. Consumers and business partners have access to multiple communication channels, including direct contacts with technical and quality teams, designated email addresses, and secure reporting platforms, allowing concerns to be raised confidentially and

transparently. Outcomes from complaints, audits and non-conformities are systematically fed back into HACCP reviews, traceability checks and recall simulations to reinforce preventive controls.

AromataGroup

AromataGroup has implemented structured processes to manage and remediate any negative impacts related to product quality and safety. **Customer complaints** and **non-conformities** are recorded in the Arxivar **digital platform**, where responsibilities, root causes, and corrective or improvement actions are systematically tracked and monitored. This tool ensures transparency and accountability throughout the entire process, allowing the company to promptly identify issues, analyze their causes, and define effective corrective measures. The **Quality Department** oversees the process and ensures that all actions are implemented and verified, guaranteeing continuous improvement and the prevention of recurrence. Through this system, AromataGroup provides consumers and business partners with a **reliable channel to raise concerns** and contributes to maintaining high standards of product quality and safety.

IPAM

The company has also implemented structured procedures for **Non-Conformity Management, Corrective Actions, Complaints, and Continuous Improvement**. These procedures define clear responsibilities and methods for identifying, resolving, and preventing deviations from expected standards. Monitoring is carried out through the systematic use of non-conformity registers, root cause analyses, and trend reviews, supported by the digital platform Arxivar. The system applies to all company operations at the Zibello and Ornago sites, including incoming materials, production processes, internal functions, and customer feedback. The Quality Assurance Manager oversees the overall process, while functional managers are responsible for implementing corrective and preventive measures. The CEO validates major improvement plans and ensures responsiveness to critical customer issues. These procedures are aligned with the *FSSC 22000* certification scheme and the internal *Quality and Food Safety Manual (MQSA)*, confirming the company's adherence to international standards.

Calaf Nuances

Calaf Nuances ensures that the quality and safety of its products are constantly monitored and improved in compliance with *ISO 9001*, *ISO 14001*, and *FSSC 22000* standards. In this context, the company systematically manages any **reports or complaints** received from customers and end-users, analyzing their causes and implementing **corrective actions** to prevent the recurrence of negative impacts. This process, overseen by **company management**, is an essential tool for strengthening customer trust and ensuring compliance with the food safety and environmental requirements established by company policies and applicable regulations.

Nactis Flavours

Nactis Flavours has established formal processes to identify, address, and remediate potential negative impacts on consumers and end-users, primarily through its comprehensive **quality and food safety management systems**. Customer complaints and non-conformities are systematically recorded, analyzed, and followed by corrective and preventive actions coordinated by the Quality Department. The company relies on *FSSC 22000* certification and HACCP procedures to ensure traceability and effective control of potential product-related risks. Dedicated **communication channels** are available for customers to raise concerns, including direct contact with sales and quality assurance teams, enabling rapid response and follow-up. All reported issues are managed confidentially and monitored until resolution, ensuring both compliance with food safety regulations and continuous improvement in customer satisfaction.

Nactarome NV

Nactarome NV has established structured processes to address and remediate potential negative impacts on consumers and end-users, primarily through its **FSSC 22000-certified quality and food safety management system**. This framework includes defined procedures for the management of customer complaints, product recalls, and non-conformities, ensuring timely corrective and preventive actions. Regular **audits** under *FSSC 22000*, together with *Halal* and *Kosher* audits conducted upon customer request, serve both as preventive controls and as formal mechanisms for identifying and resolving issues that may affect product safety or customer satisfaction. Consumers and business clients can raise concerns directly through **established communication channels**, enabling swift investigation and remediation. These processes ensure that any potential adverse impact related to product quality or safety is managed transparently and effectively, reinforcing Nactarome NV's commitment to accountability and continuous improvement.

Royal Buisman

Royal Buisman has implemented clear and effective processes to address and remediate any potential negative impacts experienced by customers or end-users. All **customer complaints or incidents** are centrally registered, investigated through **root-cause analysis**, and followed up with **Corrective and Preventive Actions (CAPA)** coordinated by the Quality Assurance team. The system ensures traceability, accountability, and timely resolution of all reported issues. Additionally, customers have access to the **ParrotWB whistleblowing platform** and external mediator, which provide a confidential and secure channel for reporting potential breaches of product safety, ethical standards, or regulatory compliance. This mechanism guarantees anonymity and protection against retaliation. Findings from complaints or whistleblowing reports are systematically reviewed during the annual management and food-safety audits to verify effectiveness and identify opportunities for improvement. In 2024, no major health- or safety-related complaints were recorded, confirming the robustness of Royal Buisman's quality and consumer-protection processes.

Nactarome Ltd

Nactarome Ltd has established several mechanisms to address and remediate any potential negative impacts on consumers and end-users. Customer complaints and non-conformities are managed through the company's **Quality Management System**, which ensures traceability, root cause analysis, and corrective actions in compliance with *BRC* and *FSSC 22000* standards. All reports are logged and investigated by the **Quality and Technical teams**, with follow-up actions documented and reviewed during management meetings. External communication channels enable customers to raise issues directly via designated email contacts or through audit feedback processes, guaranteeing responsiveness and transparency. This approach ensures that any concern related to product safety, quality, or labelling is handled promptly and effectively, contributing to the continuous improvement of Nactarome Ltd's food safety and consumer protection practices.

8.1.4 Actions and targets

[S4-4] [S4-5]

Nactarome companies have implemented **numerous actions to uphold the highest standards of product quality, safety, and customer satisfaction**. These initiatives reflect a shared commitment to continuous improvement and regulatory compliance. All entities maintain **certified food safety management systems**, supported by regular internal and external audits, staff training, and systematic reviews of non-conformities to ensure ongoing performance enhancement. Several entities have digitalised their quality and non-conformity management processes to strengthen traceability, accountability, and responsiveness. Others have introduced participatory programmes and targeted analytical developments to improve quality governance, enhance risk control, and integrate feedback from employees and customers into corrective and preventive actions. In addition, **a standardised Enterprise Resource Planning (ERP) system, SAP, has been implemented across nearly all plants** to ensure Company-level traceability and harmonised operational processes. Implementation is planned for the Calaf Nuances plant by the end of 2025, while the Royal Buisman site is excluded due to its distinct business model, with tailored traceability measures maintained to safeguard customer requirements. Collectively, these initiatives ensure that all products meet stringent safety and quality standards, fostering consumer trust and long-term business resilience.

At reporting date, Nactarome has not defined quantified targets for consumers and end-users. Performance is instead monitored through certification outcomes, audit findings, customer-satisfaction indicators and non-conformity trends, which together provide a reliable picture of product integrity and customer protection.

AromataGroup

In line with its commitment to quality, safety, and continuous improvement, AromataGroup has undertaken several initiatives to enhance its management systems and responsiveness to stakeholder feedback.

At the **Gessate site**, a **corrective action plan** was launched to develop **new analytical methods for contaminant determination**, ensuring compliance with Regulation 231/2012 and strengthening the company's analytical capability. This activity remains ongoing and forms part of the broader food safety enhancement strategy.

In 2024, the company also launched the **Ambassador Project**, a participatory initiative aimed at collecting employee feedback and ideas for improvement. Inputs are gathered through open meetings and recorded in the Arxivar platform as non-conformities flagged for improvement, allowing for systematic follow-up. The project has already led to the creation of Kaizen circles, working groups, and targeted training activities, fostering a culture of collaboration and continuous improvement.

Finally, AromataGroup has implemented a **digital system for managing non-conformities**, which ensures efficient tracking of corrective and preventive actions, clear accountability, and enhanced traceability of improvement processes. This system strengthens quality governance and supports the company's goal of maintaining the highest standards of product safety and reliability.

IPAM

From the perspective of product responsibility, IPAM has placed strong emphasis on **training** and the **digitalisation of quality processes**. In 2024, a total of **123 hours of training on quality and food safety topics** were delivered across all three production sites, ensuring that employees possess the technical and professional competencies required to apply the Food Safety Management System (FSMS). Verification tests confirmed positive results for over 70% of participants, and **no non-conformities were recorded during audits**. In parallel, the company completed the **digitalisation of the non-conformity management process** through the Arxivar platform, improving the traceability, efficiency, and monitoring of corrective and preventive actions. This initiative has enhanced responsiveness and accountability across departments, further supporting IPAM's culture of continuous operational improvement.

Calaf Nuances

Calaf Nuances applies a rigorous and proactive approach to ensuring product quality and food safety. The company undergoes **annual internal audits** conducted by Muns Consultors and **external certification audits** by SGS, maintaining *ISO 9001*, *ISO 14001*, and *ISO 22000* certifications, as well as *Halal* and *Kosher* certifications. Food safety is supported by a robust system of **internal hygiene audits** every four months, crisis management and product recall drills (PL09), and the daily application of the APPCC (HACCP) system. Additional preventive measures include the use specific software for the safe handling and labelling of products, regular microbiological and allergen controls (both internal and external), periodic analyses of raw materials for contaminants, and quarterly pest control by an accredited provider. **Continuous training** in good

manufacturing practices, food safety, and defence is provided to production staff. These ongoing initiatives ensure that all Calaf Nuances products meet the highest standards of safety, traceability, and consumer protection.

Customer satisfaction and product quality are key performance indicators for Calaf Nuances, closely monitored through the *Quality, Environmental and Food Safety* systems. The company's objectives include maintaining **fewer than four non-conformities** in *ISO 9001* and *ISO 14001* audits, and **fewer than six** in *ISO 22000* audits. These indicators are reviewed annually during quality committee meetings. Customer satisfaction is assessed through an **internal procedure** and via regular **satisfaction surveys**, with the target of achieving satisfaction levels above 85% and an overall satisfaction indicator exceeding 90%. Moreover, Calaf Nuances monitors **customer retention and turnover**, aiming for a growth rate above 3% in a defined customer sample, with results reviewed quarterly by the quality committee to identify improvement opportunities.

Nactis Flavours

Customer health, safety, and satisfaction remain key priorities for Nactis Flavours. All production sites maintain *FSSC* certification, supported by **annual audits** and corresponding **action plans**. This structured process ensures consistent product quality, regulatory compliance, and continuous improvement across the company's operations. The certification audits represent a cornerstone of Nactis Flavours' commitment to **transparency** and **customer trust**, reinforcing its reputation as a reliable and responsible supplier to the food industry.

Nactarome NV

To guarantee food safety and meet the expectations of customers and end-users, Nactarome NV maintains **annual third-party audits under the *FSSC 22000* standard**, which cover all processes and ensure continuous compliance with international regulations. In addition, the company undergoes **yearly Halal and Kosher audits** upon customer request, assessing the feasibility and conformity of production for specific product lines. These regular certifications reinforce product integrity, strengthen customer trust, and demonstrate Nactarome NV's commitment to transparency and responsiveness to market requirements.

Royal Buisman

Royal Buisman ensures product quality and safety through a certified *FSSC 22000* management system, subject to continuous improvement and **annual external audits**. The 2024 audit confirmed full compliance with no major non-conformities. Complementary to this, the company performs an **annual HACCP review** covering all process lines and raw materials to validate control measures and update risk analyses.

All production employees receive **regular training** on hygiene, traceability, and HACCP, while R&D activities focus on developing safe formulations suitable for specific dietary and ethical requirements (e.g., vegan, vegetarian, *Halal*, *Kosher*).

Finally, the company maintains **transparent communication** with customers by providing specification sheets and certificates on demand, supporting informed and safe product use.

Governance Information

9. ESRS G1 Business conduct

9.1 Impact, risk and opportunity management

[SBM-3]

Nactarome's management of impacts, risks, and opportunities related to business conduct is founded on integrity, transparency, and compliance with applicable laws and ethical standards. The legal entities enforce codes of ethics, anti-corruption training, and structured governance systems that ensure accountability at all levels. Supplier codes of conduct and whistleblowing mechanisms further support ethical business practices across the value chain. Through continuous training, monitoring, and policy enforcement, Nactarome promotes a culture of fairness and responsibility, mitigating risks of unethical behaviour and strengthening stakeholder trust.

ESRS			IROs		
Topic	Sub-topic	Sub-sub-topic	Impact	Risk	Opportunity
G1 Business conduct	Corporate culture		Promotion of fairness and ethical values among employees and toward the market		
G1 Business conduct	Corruption and bribery	Prevention and detection including training	Growth in awareness and dissemination of a culture of ethics and anti-corruption among management, employees, business partners, and other stakeholders		

9.1.1 Policies

[G1-1]

Across the Nactarome companies, governance and ethical conduct are guided by **a robust framework of policies and procedures designed to ensure integrity, transparency, and accountability in all business activities**. While each legal entity has developed its own governance instruments, all share a commitment to compliance with applicable laws, the prevention of corruption, and the promotion of responsible behaviour across the value chain. AromataGroup and IPAM have adopted comprehensive systems including a *Code of Ethics*, an *Organisational, Management and Control Model* (i.e., *Model 231*), and a *Whistleblowing Procedure*, which together

promote legal compliance, ethical culture, and protection against misconduct. Calaf Nuances' *Ethical Policy* aligns with the UN Global Compact principles, reinforcing integrity, social responsibility, and zero tolerance for corruption. Nactis Flavours, Nactarome NV, and Royal Buisman extend these principles to their suppliers through dedicated *Supplier Codes of Conduct* that establish social, environmental, and ethical expectations across the value chain. Royal Buisman and Nactarome Ltd further strengthen governance with *Whistleblowing* and *Anti-Bribery and Corruption Policies*, complemented by Royal Buisman's *Cybercrime Policy* to safeguard data integrity and business continuity. Collectively, these policies form an integrated governance architecture that promotes transparency, accountability, and ethical behaviour, ensuring that business operations across the mother Company are conducted with integrity and in full respect of legal and stakeholder expectations.

AromataGroup

Code of Ethics

AromataGroup's governance framework is founded on principles of integrity, transparency, and responsibility, as reflected in a **structured system of policies and procedures** designed to ensure ethical conduct, legal compliance, and the prevention of unlawful or unethical behaviour. The *Code of Ethics* serves as the cornerstone of this framework, defining the organisation's values and commitments in areas such as compliance with laws, respect for human rights, equality and non-discrimination, protection of health and safety in the workplace, environmental responsibility, and fair business practices. The Code applies to all company activities in Italy and abroad and extends to the entire value chain, including employees, suppliers, and business partners. It promotes transparent and respectful relationships with customers, local communities, and public authorities, fostering trust and sustainable development.

Organisational, Management and Control Model

AromataGroup has adopted an *Organisational, Management and Control Model* (Model 231) in accordance with **Italian Legislative Decree 231/2001**. This Model defines a comprehensive system of protocols, controls, and audits aimed at preventing the risk of criminal offences such as corruption, environmental violations, and occupational safety breaches. The **Supervisory Body** (Italian "Organismo di Vigilanza", "OdV"), composed of internal and external members, is responsible for ensuring the Model's effectiveness through regular monitoring, reporting, and training. All employees, collaborators, and business partners are required to comply with its provisions and with the associated *Code of Ethics*. Contractual clauses ensure that suppliers and external consultants also adhere to these principles, reinforcing ethical conduct throughout the value chain.

Whistleblowing Procedure

A key component of the integrity system is the *Whistleblowing Procedure*, implemented in compliance with Italian Legislative Decree 24/2023, which transposes EU Directive 2019/1937. The procedure establishes **secure and confidential channels** for reporting misconduct, corruption, discrimination, harassment, or other violations of the *Code of Ethics* and *Model 231*. Reports are managed independently by an external body (Labour

Project) to ensure impartiality, anonymity, and protection against retaliation. The system is open not only to employees, but also to collaborators, suppliers, shareholders, and former workers, reflecting a broad commitment to transparency and accountability. The Board of Directors retains overall responsibility for the adequacy of the procedure and the safeguarding of whistleblowers' rights.

IPAM

Code of Ethics

The *Code of Ethics* serves as the **overarching ethical charter** defining the company's commitments to legality, respect for human rights, workplace safety, equal opportunities, environmental protection, and responsible business practices. It applies to all operations, in Italy and abroad, and extends across the value chain, including suppliers and business partners. The Code incorporates principles from international standards such as **ILO conventions** and *ISO 14001*, aligning corporate conduct with recognised sustainability and governance benchmarks. Employees, collaborators, and external stakeholders are informed and trained on its contents, and the Code is made available on the company website, corporate intranet, and in printed form.

Organisational, Management and Control Model

The *Organisational, Management and Control Model (Model 231)* sets out the principles, responsibilities, and control mechanisms required to prevent the commission of predicate offences under **Italian Legislative Decree 231/2001**. It includes risk mapping, preventive protocols, a disciplinary system, and an independent **Supervisory Body** (Italian "Organismo di Vigilanza", OdV) that oversees its application, performs periodic audits, and reports annually to the Board of Directors. The Model applies to all employees, collaborators, business partners, and suppliers, extending its scope to both Italian and international activities where relevant. It draws on Confindustria Guidelines and national legislation on health, safety, and environmental protection, ensuring comprehensive coverage of IPAM's compliance responsibilities.

Whistleblowing Procedure

The *Whistleblowing Procedure* ensures that employees and stakeholders can confidentially report any unlawful conduct, breaches of *Model 231*, or violations of national and EU legislation that may affect the integrity of IPAM or the public interest. The system provides multiple internal and external **reporting channels**, managed independently by the external entity Labour Project's Whistleblowing Team, guaranteeing anonymity and protection against retaliation. Monitoring is conducted through a defined process encompassing receipt, analysis, investigation, and closure of reports. The policy complies with Italian Legislative Decree 24/2023 (transposing EU Directive 2019/1937) and GDPR, and is accessible to all interested parties via the company website, notice boards, and dedicated training activities.

Calaf Nuances

Ethical Policy

Calaf Nuances has adopted an *Ethical Policy* that formalizes its commitment to sustainability, integrity, and social responsibility in all areas of its business. The policy aligns with the **Ten Principles of the United Nations Global Compact**, covering human rights, labour, environment, and anti-corruption. It establishes the company's dedication to respecting internationally recognised human rights, ensuring fair and safe working conditions, eliminating discrimination and child or forced labour, and promoting environmental protection and the adoption of sustainable technologies. The policy also expresses a zero-tolerance stance toward corruption in all its forms, including extortion and bribery. Its scope extends across all company activities and geographical areas where Calaf Nuances operates, applying to all key stakeholders — employees, customers, suppliers, shareholders, and external collaborators such as consultants and service providers. The **management**, currently led by Executive Director, holds ultimate responsibility for overseeing the implementation and continuous monitoring of the policy's principles and objectives.

Nactis Flavours

Supplier Code of Ethics

Nactis Flavours has established a *Supplier Code of Ethics* as part of its sustainable development policy to promote **responsible business conduct** across its value chain. The Code defines clear expectations for suppliers regarding social, environmental, and ethical performance, requiring them to integrate these principles into **all production and distribution activities**. Suppliers are expected to comply with applicable national laws, international human rights standards, and the fundamental principles and rights at work, including the prohibition of child and forced labour, non-discrimination, and respect for employee dignity.

The Code sets specific commitments in key areas of responsibility. On the **ethical side**, it promotes integrity, transparency, and fairness in business practices, explicitly rejecting corruption and anti-competitive behaviour while ensuring protection of confidentiality and intellectual property. **Environmental provisions** require suppliers to identify and mitigate their impacts through emissions reduction, waste management and recovery, resource efficiency, and, where feasible, the use of renewable energy. Eco-design principles are encouraged to minimise product and packaging footprints. **Social requirements** focus on occupational health and safety through risk assessments, training, and performance monitoring, as well as on fostering diversity, social dialogue, and inclusion of people with disabilities.

The policy applies to **all suppliers and their subcontractors**, ensuring that ethical and sustainability commitments extend throughout the upstream value chain. Monitoring mechanisms include performance indicators such as health and safety metrics and waste management data, supported by social audits and internal evaluation systems. Through this Code, Nactis Flavours aims to strengthen partnerships with responsible suppliers and contribute to local economic and social development while upholding the highest standards of **integrity** and **sustainability**.

Nactarome NV

Ethical Code of Conduct

Nactarome NV has implemented an *Ethical Code of Conduct* that defines the company's commitment to human rights, fair labour practices, and ethical business behaviour. The Code prohibits forced labour, human trafficking, and child labour, and ensures respect for freedom of association, collective bargaining, and equal treatment. It also requires safe and healthy working conditions, fair remuneration, and reasonable working hours, while strictly prohibiting discrimination, harassment, and any form of inhumane treatment. The Code applies to all employees and extends implicitly to the company's value chain, setting expectations for suppliers and partners to adhere to the same international standards. It aligns with **ILO conventions**, **UN conventions**, the **ETI Base Code**, the **BSCI Code of Conduct**, and the **SA8000 International Standard**, with local directors responsible for ensuring its implementation and oversight.

Code of Conduct "Business Ethics Practices"

Nactarome NV's *Business Ethics Practices* set out the **principles of integrity and transparency** that guide all employees, supervisors, and board members in their professional conduct. The Code promotes lawful and ethical behaviour across all company operations, addressing key areas such as conflicts of interest, confidentiality, anti-bribery and anti-corruption, gifts and hospitality, and the responsible use of company assets. The Code establishes internal mechanisms for compliance, including **whistleblowing channels** that allow employees to raise concerns without fear of retaliation. It applies to all personnel and extends to relationships with suppliers, subcontractors, and customers across the value chain. The management board is accountable for implementation and reports directly to the CEO of the company. The Code also takes into account stakeholder interests by ensuring fairness, transparency, and accountability in all business interactions, and is made available to employees and external partners as required.

Supplier Code of Conduct

To promote responsible business practices across its supply chain, Nactarome NV has adopted a *Supplier Code of Conduct* that defines **ethical, social, and environmental requirements** for all suppliers, subcontractors, and business partners. The Code mandates compliance with anti-bribery, anti-money laundering, and data protection laws, and upholds **international standards** on human rights, diversity, and workplace safety. It requires suppliers to prohibit forced and child labour, guarantee fair wages and working conditions, and actively pursue environmental protection through efficient use of resources and waste reduction. In addition, suppliers must comply with EU and local food safety regulations, hold certification under a **GFSI-recognised standard**, and ensure full traceability of ingredients and packaging materials. Compliance is monitored through regular audits and supplier evaluations, and **adherence to the Code is a mandatory condition of collaboration**. The Code incorporates the interests of key stakeholders — workers, consumers, communities, and business partners — and requires suppliers to cascade its principles throughout their own value chains to foster ethical and sustainable supply practices.

Royal Buisman

Code of Conduct

Royal Buisman's *Code of Conduct* defines the ethical and professional standards that guide all business activities, ensuring integrity, transparency, and accountability across the organisation. The Code applies to **all employees, managers, contractors, and third-party collaborators** and covers key areas such as anti-corruption, fair competition, confidentiality, data protection, health and safety, environmental responsibility, and non-discrimination. Its objective is to ensure that all business practices comply with legal obligations, align with the company's values, and promote a culture of respect and responsibility.

The Code serves as a practical reference in **daily operations and decision-making**, requiring staff to act with honesty and fairness and to report any behaviour inconsistent with these principles. It reflects the company's commitment to respecting **international human rights and labour standards**, including the ILO core conventions, and to preventing any form of forced, child, or discriminatory labour.

Implementation and monitoring are overseen by the **Managing Director** and the **HR Department**, with support from the QHSE Manager. Compliance is reinforced through onboarding training, periodic communication campaigns, and inclusion of ethical principles in performance evaluations and supplier relationships. The Code is distributed to all employees and available via the company's intranet and noticeboards. Through these mechanisms, Royal Buisman ensures that ethical conduct is deeply embedded in its corporate culture and daily practice.

Whistleblowing Policy

The *Whistleblowing Policy* provides a formal and confidential mechanism for employees and stakeholders to report suspected misconduct, unlawful acts, or violations of the *Code of Conduct*. Its primary objectives are to promote transparency, safeguard integrity, and protect whistleblowers from retaliation.

Reports can be submitted through internal or external channels, including the **ParrotWB platform**, which guarantees anonymity and data protection in compliance with EU Directive 2019/1937 and the General Data Protection Regulation (GDPR). The policy defines clear steps for the management of reports, including receipt, preliminary assessment, investigation, and closure, with the **Whistleblowing Officer** ensuring timely handling and impartiality. The **Supervisory Body** monitors the process and the effectiveness of corrective actions.

Awareness and accessibility are ensured through internal communication campaigns, integration into the *Employee Handbook*, and visible postings in the workplace. Training sessions inform staff of their rights and responsibilities under the policy. The policy demonstrates Royal Buisman's commitment to ethical business management and its proactive stance against corruption, discrimination, and other forms of misconduct.

Supplier Code of Conduct

Royal Buisman's *Supplier Code of Conduct* extends the company's ethical, social, and environmental principles throughout its supply chain. Based on the **ETI Base Code** and aligned with international conventions such as the **UN Global Compact** and **ILO** core

labour standards, the Code establishes minimum requirements for suppliers in areas including human rights, working conditions, occupational health and safety, environmental protection, and anti-corruption.

Suppliers are required to ensure compliance with applicable laws, prevent forced and child labour, respect freedom of association, prohibit discrimination, and provide safe and fair working environments. On the environmental side, they must minimize pollution, manage waste responsibly, and adopt resource-efficient practices. Suppliers are also expected to maintain transparent financial and business relationships and to reject any form of bribery or unethical conduct.

Compliance with the *Supplier Code of Conduct* is a **contractual obligation**, and Royal Buisman reserves the right to conduct audits, request corrective actions, or terminate relationships in cases of non-compliance. The **Managing Director** and the **Purchasing Department** oversee its implementation, supported by the QHSE function for verification and monitoring. Through this policy, Royal Buisman promotes a responsible and sustainable supply chain built on trust, accountability, and shared ethical values.

Cybercrime Policy

The *Cybercrime Policy* defines preventive and behavioural measures to protect Royal Buisman's digital infrastructure, sensitive data, and business operations from **cybersecurity threats**. It outlines the responsibilities of **all employees** and the **IT Helpdesk** in preventing, identifying, and responding to cyber incidents such as phishing, data breaches, or unauthorised access.

The policy's objectives are to ensure confidentiality, integrity, and availability of information systems, while fostering a culture of cybersecurity awareness across the company. It establishes procedures for incident reporting, response coordination, and documentation, along with regular system monitoring and maintenance. The **IT Helpdesk** leads implementation and provides ongoing training and communication to enhance employee vigilance and compliance.

The policy complies with relevant **EU and Dutch regulations** on data protection and cybersecurity and supports the company's obligations under the **GDPR**. Employees receive periodic awareness updates, and access to company systems is strictly controlled according to job functions. Through this policy, Royal Buisman strengthens resilience against digital threats and safeguards both operational continuity and stakeholder trust.

Nactarome Ltd

Whistleblowing Policy

Nactarome Ltd has adopted a comprehensive *Whistleblowing Policy* designed to promote integrity, transparency, and accountability throughout the organisation. The policy encourages all employees and associated personnel to report suspected wrongdoing, including unethical behaviour, breaches of policy, or illegal activity, without fear of retaliation. Its objectives are to ensure that concerns are handled seriously, investigated appropriately, and managed in a strictly confidential manner. The **reporting process** follows a clear escalation procedure — from line managers to the Director and ultimately the Chair of the Board — while anonymous reporting is facilitated through

confidential suggestion boxes monitored by the HR Manager. The company also provides access to independent external channels, such as **Protect**, an independent whistleblowing charity, and the **Modern Slavery Helpline**, for matters involving potential criminal or human rights breaches.

The policy applies to all individuals working with or for the company, including employees, contractors, consultants, agency staff, volunteers, and placement students, both within the UK and abroad. It excludes personal employment grievances, which are addressed through the company's dedicated grievance procedure. Accountability for implementation lies with the **Chair of the Board**, while the **HR Manager** is responsible for monitoring the process and ensuring confidentiality in the handling of reports. By embedding the policy in the *Employee Handbook* and promoting awareness through regular communication, Nactarome Ltd fosters a workplace culture in which ethical conduct and open dialogue are encouraged, and whistleblowers are protected against retaliation in accordance with UK regulatory frameworks.

Anti-Bribery and Corruption Policy

Nactarome Ltd maintains a rigorous *Anti-Bribery and Corruption Policy* aimed at preventing, detecting, and addressing any form of bribery or corrupt practice within its **operations** or **business relationships**. The policy articulates a clear **zero-tolerance approach** and establishes the responsibilities of all employees and third parties acting on behalf of the company to uphold ethical business standards. It provides specific guidance on recognizing and responding to bribery risks, as well as clear definitions of what constitutes a bribe and who qualifies as a third party under the policy.

The company's **control framework** includes strict financial record-keeping, internal controls, and mandatory declarations for any gifts or hospitality received or offered, which must be reviewed by the relevant line manager. Expense claims are subject to the company's expense policy and require justification to ensure transparency. Preventive and corrective actions are part of a continuous monitoring process involving management oversight and periodic reviews. The policy applies to all employees, contractors, and volunteers, and extends to business partners and agents representing the company both in the **UK and internationally**. Through this policy, Nactarome Ltd reaffirms its commitment to conducting business honestly, fairly, and transparently, in line with best practices and applicable legal standards.

9.1.2 Management of relationships with suppliers

[G1-2]

Nactarome and its affiliated entities manage supplier relationships through **structured and responsible procurement processes** that integrate quality, ethical, and regulatory standards. Suppliers are evaluated and monitored based on criteria encompassing product safety, traceability, compliance with food safety certifications, and adherence to social, environmental, and anti-corruption principles. Codes of conduct, supplier questionnaires, performance reviews, and documented audits ensure that suppliers align with the legal entities' sustainability, ethical, and operational expectations.

AromataGroup

AromataGroup manages its relationships with suppliers through a **structured and responsible procurement approach**, ensuring compliance with legal, ethical, and quality standards. Supplier qualification and monitoring processes are designed to guarantee the safety and traceability of raw materials, packaging, and services, in line with applicable food safety certifications and internal procedures. The company promotes transparent and long-term collaborations with suppliers that share its values of **integrity, sustainability, and compliance** with national and EU regulations. In accordance with its compliance framework and Legislative Decree 231/01, AromataGroup ensures that suppliers adhere to high ethical and operational standards, fostering continuous improvement in supply chain performance and integrity.

IPAM

IPAM oversees supplier relationships with a focus on quality, transparency, and compliance with applicable food safety and ethical standards. The company applies accurate supplier selection and evaluation criteria to ensure that all partners meet its requirements for **reliability, traceability, and conformity** with regulatory obligations. Collaboration with suppliers is based on mutual trust and continuous dialogue, supporting the development of responsible sourcing practices and alignment with IPAM's commitment to product quality and sustainability. Finally, IPAM's attention ensures that suppliers contribute positively to the company's operational and ethical objectives.

Calaf Nuances

Calaf Nuances ensures that its supply chain upholds the same standards of responsibility and safety that guide its internal operations. The company conducts **annual supplier evaluations** using an internal questionnaire; in addition, it also includes **environmental and social requirements** in the purchase conditions that suppliers are requested to sign in order to be accepted. The company also implements a comprehensive **Prevention Plan** covering occupational risk assessment, control of working conditions, health surveillance, emergency measures, training, and coordination of business activities. These processes, reviewed and updated annually, apply across the entire company and are overseen by management to ensure continuous improvement in occupational health, safety, and responsible sourcing practices.

Nactis Flavours

Nactis Flavours manages its relationships with suppliers through a *Supplier Code of Ethics*, which forms part of its sustainable development policy. The Code defines environmental, social, and ethical expectations that all suppliers must meet, covering compliance with national and international laws, human rights, anti-corruption, and fair

competition principles. It also encourages proactive management of environmental impacts, health and safety, and diversity in the workplace.

Suppliers are required to sign the Code and to apply its principles across their own operations and subcontracting chains. Evaluation and monitoring are carried out through **annual questionnaires and performance reviews**, enabling Nactis Flavours to assess supplier compliance and identify areas for improvement. This approach ensures responsible procurement practices and strengthens long-term, trust-based partnerships within the value chain.

Nactarome NV

As part of its commitment to responsible sourcing and fair labour practices, Nactarome NV has integrated the *Supplier Code of Conduct* into its **supplier evaluation process**. By 2026, all raw material and packaging suppliers will be assessed not only on quality and reliability criteria but also on their adherence to the **ethical, social, and environmental principles** set out in the Code. This initiative aims to strengthen accountability across the supply chain and ensure that suppliers align with the company's sustainability standards. The process is currently in progress and will become a key element of the supplier qualification framework.

Royal Buisman

Royal Buisman manages supplier relationships through its *Supplier Code of Conduct*, which integrates **ethical, social, and environmental standards**, including anti-corruption and fair business clauses. Suppliers are required to sign and comply with the Code, and their performance is reviewed periodically. Integrity and compliance are further supported by the *Whistleblowing Policy* (ParrotWB platform), which enables suppliers to report concerns confidentially. These measures ensure transparency, accountability, and shared commitment to responsible business conduct throughout the supply chain.

Nactarome Ltd

Nactarome Ltd manages its relationships with suppliers through a structured procurement process designed to ensure quality, compliance, and ethical integrity across the supply chain. The company works exclusively with approved suppliers who meet stringent criteria for food safety, traceability, and regulatory compliance, **in line with its BRC Grade A and FSSC 22000 certifications**³⁹. Supplier approval and monitoring are based on documented evaluations, including quality audits, performance reviews, and verification of certifications such as *Halal* and *Kosher*⁴⁰ where applicable. Nactarome Ltd maintains continuous **communication with suppliers** to ensure alignment with its standards on product safety, ethical conduct, and environmental responsibility. This proactive approach fosters long-term, trust-based

³⁹ For further information about the certifications, please see § Policies in Chapter ESRS S4 Consumers and end-users.

⁴⁰ For further information about the certifications, please see § Policies in Chapter ESRS S4 Consumers and end-users.

partnerships and supports the company's commitment to maintaining the highest standards of integrity and quality throughout its value chain.

9.1.3 Actions and targets

[G1-3]

Within Nactarome companies, integrity, transparency, and accountability form the foundation of corporate governance and ethical business conduct. The legal entities have implemented **structured systems to prevent and detect corruption, bribery, and other unlawful acts, integrating dedicated control frameworks** such as the *Organisational, Management and Control Model (Model 231)* in Italian legal entities, *Codes of Conduct*, and *Whistleblowing Procedures*. These frameworks establish clear responsibilities for compliance monitoring, internal controls, and reporting mechanisms, ensuring that all employees and stakeholders can safely raise concerns without fear of retaliation. Regular training programmes — delivered through both classroom and digital formats — reinforce awareness of anti-corruption principles, conflict-of-interest management, and ethical decision-making across all organisational levels. Furthermore, supplier assessments and *Codes of Conduct* embed integrity standards throughout the value chain, promoting responsible business practices beyond company boundaries.

AromataGroup

AromataGroup has adopted an *Organisational, Management and Control Model (Model 231)*, which defines the company's governance framework for preventing and detecting corruption, bribery, and other unlawful or unethical acts. The Model establishes clear procedures for internal controls, risk assessment, and the identification of potential irregularities. It is complemented by a **whistleblowing system**, managed through an **independent and confidential channel**, allowing employees and stakeholders to report suspected violations or unethical behaviour safely and without fear of retaliation.

The company provides **mandatory training sessions** on legal compliance and best practices, aiming to ensure that all employees understand the principles of corporate ethics, risk prevention, and the regulatory framework governing business conduct. The objective is to achieve **at least 80% participation across all staff categories by 2025**, reinforcing a culture of integrity and accountability throughout the organisation. This integrated system ensures continuous monitoring of compliance and reinforces the company's commitment to transparency and ethical business conduct.

AromataGroup demonstrates an excellent level of training coverage, with all participants at the Executive level and all members of the administrative, management, and supervisory bodies having completed the **anti-corruption and anti-bribery training programmes**. In total, 8 Executives and 8 Governance Body members were trained, achieving full coverage of the identified target personnel. The training was primarily delivered through classroom sessions, providing a direct and mandatory learning experience designed to ensure thorough understanding and retention of the material.

Each participant in the targeted roles completed a session focused on key principles, policies, and reporting procedures.

IPAM

IPAM has implemented a structured system to prevent and detect corruption and bribery, integrated into its *Organisational, Management and Control Model (Model 231)*. The system includes clear procedures and regular supervision by the **Supervisory Body** (OdV), which reviews documentation and holds periodic meetings with department managers to monitor compliance and identify potential risks. Training sessions are provided to all managers and key staff to raise awareness of ethical behaviour, anti-money laundering, and the prevention of harassment and illicit actions. Furthermore, IPAM has established an **independent external whistleblowing channel**, ensuring confidentiality and protection against retaliation for employees reporting any suspected misconduct.

Four members of the administrative, management, and supervisory bodies also completed **anti-corruption and anti-bribery training programmes**. The training was delivered through classroom sessions, ensuring direct and interactive learning. It is scheduled to be conducted once per year, reinforcing awareness of the company's anti-corruption and ethical standards among key governance roles.

Nactarome NV

Within the framework of its ethical business practices, Nactarome NV integrates the *Supplier Code of Conduct* into supplier evaluations, ensuring that all raw material and packaging partners formally subscribe to its principles. The Code establishes clear expectations regarding human rights, fair labour conditions, anti-corruption, and environmental protection. Its inclusion in the supplier assessment process — currently being implemented — enhances the alignment of **procurement activities** with the company's broader **governance and compliance objectives**, contributing to the prevention of unethical practices across the supply chain.

In 2024, Nactarome NV demonstrated a structured approach to **anti-corruption and anti-bribery training**, focusing on leadership and governance roles. Training coverage for Executives reached 75%, while coverage for members of administrative, management, and supervisory bodies was 13%. The programme was delivered via computer-based sessions totaling three hours for participants and is scheduled to be conducted annually.

Royal Buisman

Royal Buisman's approach to business integrity is anchored in its *Code of Conduct*, reviewed in February 2024, and its *Whistleblowing Procedure*, launched on 17 June 2024 in full alignment with EU Directive 2019/1937. These instruments set clear standards for ethical behaviour, anti-corruption, transparency, and non-retaliation. They apply to **all employees**, contractors, and suppliers, forming an integral part of onboarding and

refresher training programmes coordinated by **HR** and **QESH**. In 2024, no formal whistleblowing reports or confirmed cases of retaliation were recorded, reflecting the company's commitment to maintaining a respectful, safe, and fair working environment for all employees.

Preventive actions include training on conflicts of interest and anti-bribery, approval rules for gifts and hospitality, segregation of duties in procurement, and supplier qualification through the *Supplier Code of Conduct*, which embeds integrity and fair-business clauses. In 2024, 100% of employees completed ethics training, and no breaches or retaliation cases were reported.

The **ParrotWB** reporting platform ensures confidential and timely handling of reports, with acknowledgment within seven days and feedback within three months. The **Managing Director** and **QESH Manager** review the effectiveness of these actions annually as part of the internal audit and management-review cycle, using indicators such as training completion rates, audit observations, and number of reports received (zero in 2024).

In 2024, Royal Buisman achieved full **anti-corruption and anti-bribery training coverage**, with 100% of employees participating. Training was delivered entirely through classroom sessions, totaling 4 hours for Executives, 216 hours for Governance Body members, and 360 hours for other own workers, demonstrating both depth and comprehensiveness. The training for other own workers is required once per year, while leadership and governance roles are expected to follow an equivalent or higher frequency.

9.2 Metrics

9.2.1 Confirmed incidents of corruption or bribery

Nactarome demonstrates a strong commitment to ethical conduct. Each legal entity operates under policies and procedures designed to ensure integrity, transparency, and accountability in all business activities. This shared framework supports a culture that promotes fair labour conditions, respect for human rights, and the active prevention of corruption.

In 2023 and 2024, no cases of active or passive corruption were identified within Nactarome; consequently, there were no fines, sanctions, disciplinary measures, or contract terminations associated with corruption during these years. The only exception concerns AromataGroup in 2023, where a single instance of non-compliance with local regulatory requirements led to the payment of a modest administrative fine, which was promptly resolved.

The absence of corruption cases reflects the effectiveness of Nactarome's internal controls and compliance systems, as well as the Company's ongoing commitment to strengthening governance practices, employee training, and continuous monitoring across its operations.

[G1-4]

Convictions and fines	2023	2024
The number of convictions	1	0
Amount of fines issued for violations of laws against anti-corruption and anti- bribery laws in euro	14,143.60	0

Confirmed incidents of corruption or bribery	2023	2024
The total number and nature of confirmed incidents of corruption or bribery	0	0
The number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	0	0
The number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	0	0

9.2.2 Criteria for evaluating new suppliers

In 2024, the total number of Nactarome's suppliers increased compared to 2023, reflecting the company's business growth and diversification of sourcing markets. During the year, 93 new suppliers were added, of which **15% were screened using environmental criteria and 16% using social criteria.**

Following a strengthened due diligence process implemented in the second half of 2024, the Company effectively mitigated a potential supply chain disruption related to

vanilla beans sourced from Madagascar. In line with Nactarome's commitment to responsible procurement, a new origin-based supplier was identified and approved, after being selected according to robust environmental and social criteria. The Company continues to enhance its supplier evaluation processes, aiming to expand the scope of sustainability screening and further integrate ESG performance into procurement decisions in the coming years.

New suppliers assessed using environmental and social criteria	2023	2024
New suppliers that were screened using environmental criteria	19%	15%
Total number of suppliers	1,235	1,477
New suppliers added during the year	63	93
Number of suppliers that were screened using environmental criteria	235	218
New suppliers that were screened using social criteria	16%	16%
Total number of suppliers	1,185	1,477
New suppliers added during the year	63	93
Number of suppliers that were screened using social criteria	185	243

Appendix

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

ESRS Standard		Disclosure requirement		Paragraph
ESRS 2	Basis for preparation	BP-1	General basis for preparation of sustainability statements	1.1.1
		BP-2	Disclosures in relation to specific circumstances	1.1.2
	Governance	GOV-1	The role of the administrative, management and supervisory bodies	1.2.1
		GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	1.2.2
		GOV-3	Integration of sustainability-related performance in incentive schemes	1.2.3
		GOV-4	Statement on due diligence	1.2.4
		GOV-5	Risk management and internal controls over sustainability reporting	1.2.5
	Strategy	SBM-1	Strategy, business model and value chain	1.3.1
		SBM-2	Interest and views of stakeholder	1.3.2
		SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.3.3
	Impacts, risks and opportunity management	IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	1.4.1
ESRS E1	Climate change	IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	2.1
		E1-2	Policies related to climate change mitigation and adaptation	2.1.1
		E1-3	Actions and resources in relation to climate change policies	2.1.2
		E1-4	Targets related to climate change mitigation and adaptation	2.1.2
		E1-5	Energy consumption and mix	2.2.1
		E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	2.2.2
ESRS E2	Pollution	IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	3.1
		E2-1	Policies related to pollution	3.1.1
		E2-4	Pollution of air, water and soil	3.2.1
		E2-5	Substances of concern and substances of very high concern	3.2.1
ESRS E3	Water and marine resources	IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	4.1

ESRS Standard		Disclosure requirement	Paragraph
	E3-1	Policies related to water and marine resources	4.1.1
	E3-2	Actions and resources related to water and marine resources	4.1.2
	E3-3	Targets related to water and marine resources	4.1.2
	E3-4	Water consumption	4.2.1
ESRS E5 Resource use and circular economy	IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	5.1
	E5-1	Policies related to resource use and circular economy	5.1.1
	E5-2	Actions and resources related to resource use and circular economy	5.1.2
	E5-3	Targets related to resource use and circular economy	5.1.2
	E5-4	Resource inflows	5.2.1
	E5-5	Resource outflows	5.2.2
ESRS S1 Own workforce	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	6.1
	S1-1	Policies related to own workforce	6.1.1
	S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	6.1.2
	S1-4	Acting on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	6.1.3
	S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	6.1.3
	S1-6	Characteristics of the undertaking's employees	6.2.1
	S1-7	Characteristics of non-employee workers in the undertaking's own workforce	6.2.2
	S1-8	Collective bargaining coverage and social dialogue	6.2.3
	S1-9	Diversity metrics	6.2.4
	S1-11	Social protection	6.2.5
	S1-12	Persons with disabilities	6.2.6
	S1-13	Training and skills development metrics	6.2.7
	S1-14	Health and safety metrics	6.2.8
	S1-15	Work-life balance metrics	6.2.9
	S1-16	Compensation metrics (pay gap and total compensation)	6.2.10

ESRS Standard		Disclosure requirement		Paragraph
ESRS S2	Workers in the value chain	S1-17	Incidents, complaints and severe human rights impacts	6.2.11
		SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	7.1
		S2-1	Policies related to value chain workers	7.1.1
ESRS S4	Consumers and end-users	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	8.1
		S4-1	Policies related to consumers and end-users	8.1.1
		S4-2	Processes for engaging with consumers and end-users about impacts	8.1.2
		S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	8.1.3
		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	8.1.4
		S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	8.1.4
ESRS G1	Business conduct	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	9.1
		G1-1	Corporate culture and business conduct policies and corporate culture	9.1.1
		G1-2	Management of relationships with suppliers	9.1.2
		G1-3	Prevention and detection of corruption and bribery	9.1.3
		G1-4	Confirmed incidents of corruption or bribery	9.2.1