

Pollution policy – Spadel group



Spadel

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1 Introduction

The Pollution Control Policy formalises the Spadel Group's commitment to preventing, reducing and controlling environmental risks to water resources and the environmental impacts associated with its bottling and production activities. It covers atmospheric emissions from utilities and processes, industrial and domestic water discharges treated before being released back into the natural environment, as well as the prevention of soil pollution and waste management. This policy is in line with the **Corporate Sustainability Reporting Directive (CSRD)** and the **ESRS E2 – Pollution** and **ESRS E3 – Water and Marine Resources** standards, and is based on the **GRI 303 (Water and Effluents)** and **GRI 306 (Waste)** standards, as well as the **environmental management systems (including ISO 14001)** and **water governance (AWS)** deployed within the Group, depending on the site.

2 Objective

The aim of this policy is to prevent any pollution of water resources and any pollution resulting from the Group's industrial operations, ensure regulatory compliance at all sites, and continuously reduce the emissions, effluents and waste associated with Spadel's activities.

3 Scope

This policy applies to all Spadel entities and covers all activities included in the Environmental Excellence Programme.

The Environmental Excellence Programme is the operational framework within which pollution prevention, regulatory compliance, environmental controls, risk analysis and emergency plans are managed. It provides the structure for all the minimum requirements and best practices to be implemented in order to prevent water, soil and air pollution at each site.

All sites are assessed according to the criteria of this environmental excellence programme, guaranteeing consistent practices and continuous improvement.

3.1 Pollution risk management indicator for water resources

- **Approach**

The potential pollution of water resources represents a critical issue for the sustainability of Spadel's activities. Each site carries out a comprehensive environmental risk assessment focused on water resources. This analysis is based on internal water management standards, including watershed maps, hydrogeological analyses, emergency plans and mitigation measures.

The approach also relies on interaction with local response services to verify the relevance of prevention measures and operational incident response capabilities. This indicator provides a uniform and comparable view of the level of pollution risk management for all water resources.

- **Commitments**

Spadel is committed to conducting and maintaining environmental risk analyses, as well as taking collective action with local stakeholders to reduce or prevent the risk of contamination of all water resources.

- **Indicators and monitoring**

The risk of pollution of water resources is monitored via the «risk control indicator» for each resource. This indicator identifies the proportion of resource risks deemed significant which are subject to sufficient control by the site and its local stakeholders.

The risk indicator classifies each site according to one of the following levels: Core, Silver, Gold or Platinum. Consolidated monitoring is based on the proportion of sites achieving at least Core level. This monitoring is updated annually as part of the Environmental Excellence Programme and CSRD reporting. The results are based on controls, audits, risk assessments, emergency drills and regular validation of prevention and monitoring systems.

Note that this indicator is shared to manage the risk of resource pollution highlighted in ESRS E3: Water.

3.2 Environmental Excellence Programme certification level

- **Approach**

The Environmental Excellence Programme constitutes the Spadel Group's central environmental management methodology. It defines the pollution prevention, regulatory compliance, risk assessment and operational control requirements applicable to all sites. The criteria include water quality monitoring, contamination prevention, control of hazardous substances, management of sensitive facilities and emergency preparedness.

The programme is also linked to standard practices for internal water management and AWS certification, which provide a framework for water monitoring, risk analysis and the prevention of water and soil pollution. Each site is assessed on the basis of a structured maturity model that enables us to objectively measure its level of environmental performance.

- **Commitments**

Spadel is committed to continuously improving the environmental performance of its sites, with the aim of achieving at least the Core level for each of them.

To accomplish this, Spadel schedules annual audits to measure compliance and identify areas for improvement. Associated action plans are implemented and monitored locally to address gaps and strengthen control of critical environmental aspects.

Spadel is also committed to making the investments needed to guarantee compliance, improve equipment and reinforce prevention measures. Finally, the company is gradually aligning all its internal standards with CSRD requirements.

- **Indicators and monitoring**

Monitoring is based on the level of environmental maturity achieved by each site in the Environmental Excellence Programme, with progress assessed regularly through internal audits.

The Environmental Excellence programme classifies each site according to one of the following levels: Core, Silver, Gold or Platinum. Consolidated monitoring is based on the proportion of sites achieving at least Core level.

The levels are consolidated in order to measure Spadel's overall performance and support strategic decisions relating to environmental management. Monitoring progress is an integral part of Spadel's annual sustainability reporting, and constitutes the second pollution target defined by Spadel.

3.3 Microplastics

With regard to microplastics, Spadel applies regulatory requirements to reduce impacts. Although no specific quantitative targets have been published to date, Spadel is actively monitoring regulatory developments and evaluating environmental monitoring methods suited to its activities.

4 Review and continuous improvement

Spadel Group Operations Director brings this policy to life and ensures it is properly implemented.

The Pollution Control Policy is reviewed annually to incorporate regulatory changes, audit results and feedback from site experience. Indicators are analysed as part of the CSRD reporting process, and any non-compliance gives rise to a documented corrective action plan. The Group's environmental excellence programmes provide the structure for the continuous improvement approach and risk prevention.

5 Publication and communication

The Policy is approved by Spadel's Executive Committee and distributed to all employees, partners and stakeholders. It is published on the Spadel website, integrated into the Sustainability Statement and the Annual Report. Spadel is committed to transparent, verifiable communication regarding its compliance, preventive actions and ongoing progress in reducing industrial pollution.

Annex

Spadel's Pollution policy addresses material impacts, risks and opportunities (IROs) identified during Spadel's double materiality assessment (DMA) and includes key considerations essential for limiting the pollution of water and microplastics.

Table 1. Material IROs within the context of Spadel's Pollution policy.

Type of IRO	Material IRO
Risk	Pollution of springs, ground water or a protection area leading to pollution of the main resource needed for Spadel operations. Positive impact
Risk	Pollution arising from the Group's industrial activities, concerning any of the sites it operates or has operated in the past, could result in clean-up costs and adversely affect its image and reputation.
Negative impact	Releasing microplastics from plastic bottles into the environment negatively affects all living things, including consumers as well as marine and terrestrial organisms.
Risk	Enhancement of country-based regulations related to PET plastic and associated microplastic pollution, leading to a disruption of operations.