Water Policy – Spadel Group

Spadel

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1 Introduction

Water is at the heart of Spadel's identity and mission. An essential and fragile natural resource, it is both the raw material for our products and a shared natural heritage that must be preserved. Sustainable water management is not merely an obligation for Spadel; it is a founding conviction, embedded since the outset at the core of our corporate strategy and environmental commitments.

This Water Policy formalises Spadel's commitment to the responsible, sustainable and integrated management of water resources. The document defines the principles, objectives and monitoring mechanisms that guide all Spadel activities, from source protection to the return of water to the natural environment.

This policy is in line with the **Corporate Sustainability Reporting Directive (CSRD)** and the **ESRS E3 - Water and Marine Resources** standard, and is based on the **GRI 303 - Water and Effluents** standards, which govern transparency, governance and performance on an international scale.

2 Purpose

The aim of Spadel's Water Policy is to protect the quality and sustainability of water resources, while respecting natural balances and the needs of local communities. The objective is to ensure that every litre of water extracted is balanced between industrial needs, natural regeneration and environmental expectations.

Spadel commits to protecting the environment within hydrological basins, maintaining water abstraction below natural recharge capacities, continuously improving process efficiency to reduce water consumption, and ensuring full compliance of wastewater discharges.

This policy provides the guiding framework for Spadel's water strategy, integrating sustainable water management into all industrial, environmental and governance decisions.

3 Scope

This policy applies to all water used by our production sites (natural mineral water, spring water and utility water). It applies to all Spadel production sites and in all countries where the Group operates. It covers the entire water cycle: selection and protection of water resources, sustainable management of water withdrawals, efficiency measures for industrial consumption and quality of wastewater discharges.

It extends across the hydrological basins of the water resources exploited, and includes relations with stakeholders involved in water management.

Reporting and monitoring are based on **GRI 303**, which provides a framework for transparency with regard to water withdrawals, consumption and discharges, on the **Alliance for Water Stewardship (AWS) standard**, guaranteeing sustainable and responsible management at catchment level, and on the **ESRS E3 standard**, which structures publication requirements within the CSRD framework.

3.1 Selecting and protecting water resources

- ### Approach

  The selection of a water resource is based on detailed hydrogeological studies: geological knowledge of the catchment area, study of the quantities of water available, analysis of the microbiological quality and physicochemical composition of the water, etc.

  Protection involves anticipatory and collective risk management, with the aim of preventing any risk of contaminating water resources.

- ### Commitments

  Spadel undertakes to carry out and maintain risk analyses and take collective action with local stakeholders in order to reduce or prevent the risks of contamination of all bottled water resources.

- ### Indicators and monitoring

  The protection of water resources bottled by Spadel is monitored via the risk 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.

  Protection performance is consolidated in accordance with GRI 303-1/2 and audited in line with ESRS E3, guaranteeing the reliability and conformity of published indicators.

3.2 Water Withdrawal Management

- ### Approach

  Water withdrawal management is aimed at ensuring a balance between the volumes extracted and the natural regeneration capacity of the aquifers, while preserving the ecosystems and shared uses within the catchment area. Each water resource is the subject of hydrogeological modelling, integrating geological parameters, water cycle parameters and, where relevant, climate projections to anticipate periods of water stress.

  All abstraction points are equipped with calibrated flow meters, enabling continuous monitoring of withdrawn volumes and comparison with authorised maximum limits.

  The key reference indicator is the Water Extraction Index (WEI), the ratio between the volume drawn from water resources and the estimated volume of natural recharge.

  A WEI of less than 20% indicates that withdrawals are sustainable and compatible with natural recharge. This index is calculated annually, and alert thresholds can trigger operational adjustment measures to preserve the sustainability of water withdrawals.

- ### Commitments

  Spadel undertakes to maintain a WEI of less than 10% (2 x less than the standard threshold) for all water resources bottled by Spadel, to adjust its extraction volumes to actual hydrological conditions, and to integrate climate scenarios into its extraction planning. The Group audits its withdrawals periodically and publishes consolidated data in accordance with GRI 303-3 and ESRS E3.

- ### Indicators and monitoring

  Volumes withdrawn are monitored on a monthly basis at least. The Water Extraction Index (WEI) is calculated on an annual basis.

  All data and indicators are consolidated and published in the annual environmental report, integrated into the CSRD report and audited periodically to guarantee data transparency and reliability.

3.3 Efficiency – Water Consumption

- ### Approach

  The efficiency of the production process is a key priority for Spadel's environmental performance. The aim is to minimise the amount of water used in industrial processes, while guaranteeing food safety and end-product quality.

  Each site draws up a detailed water balance sheet, in compliance with GRI 303-5, listing direct uses (rinsing, cleaning, cooling, formulation) and indirect uses (sanitary facilities, maintenance, utilities). Wastewater from industrial processes is treated prior to discharge, with analyses carried out to ensure compliance with local regulations.

  The key reference indicator is the Water Use Ratio (WUR), the ratio between the volume of water consumed and the volume of water bottled by the bottling site.

- ### Commitments

  Spadel is committed to continuing its gradual reduction in water consumption per litre of product, and to maintaining full compliance of discharges at all its sites.

- ### Indicators and monitoring

  The Water Use Ratio (WUR) is calculated on a monthly basis at each Spadel bottling site. The indicator is consolidated in accordance with GRI 303-5 and ESRS E3 guidelines, then integrated into CSRD reporting.

  Performance is reviewed annually by the Executive Committee, which approves corrective action plans and investment priorities to achieve the targets set each year.

4 Revision and Continuous Improvement

The Water Policy is reviewed every year to incorporate scientific advances, audit results and regulatory changes. The Water & Environment department coordinates this review with the Sustainability Department and the Executive Committee.

Performance indicators are analysed as part of the CSRD reporting process, with documented corrective action plans drawn up in the event of deviations.

This continuous improvement process guarantees the relevance, transparency and robustness of our water management system.

5 Publication and Communication

The Water Policy is validated by Spadel's Executive Committee and distributed to all employees, partners and stakeholders. It is published on the Group's website, integrated into the CSRD Sustainability Statement and the Spadel annual report. The Group is committed to transparent, verifiable communication regarding its water performance, publishing audited indicators and sharing progress with local and international stakeholders.

Annex

Spadel's Water policy addresses material impacts, risks and opportunities (IROs) identified during Spadel's double materiality assessment (DMA) and includes key considerations essential for sustainable water consumption and withdrawal.

Table 1. Material IRO's in the scope of Spadel's Water policy.

Type of IRO	Material IRO
Negative impact	Consuming water within Spadel contributes to potential water scarcity in the regions of operations.
Positive impact	Using appropriate assessment to identify total water available for sustainable extraction e.g. using hydrological assessments and pumping tests to set maximum flow rate regarding the local water resource capacity and not extract irreversible amounts in terms of regeneration.
Negative impact	Continuous withdrawal of ground water sources impacting water availability for the ecosystems and neighboring communities.
Risk	Global warming could negatively impact the Group's water capacity or lead the countries in which the Group is active to restrict, for public interest purposes, the capacity that the Group can operate, which would adversely impact Group's activities and results.