

Spadel – Public Disclosure on Lobbying Activities and Political Engagement in 2025

1. Approach to Public Policy and Transparency

Spadel is committed to conducting its public affairs and advocacy activities with integrity, transparency, and in alignment with its long-term sustainability strategy.

Each fiscal year, Spadel discloses:

- The value and recipients of financial or in-kind political contributions
- A summary of its material lobbying positions
- The key intermediary organizations through which it engages on public policy matters

Spadel ensures that all advocacy activities are consistent with:

- Its corporate purpose
- Its sustainability commitments
- Recognized scientific evidence and public interest

2. Political Contributions

Spadel does not make direct financial contributions to political parties or candidates.

Where relevant, Spadel may contribute to:

- Industry consultations
- Public policy working groups
- Sectoral associations

These contributions may include:

- Membership fees to trade associations
- Participation of employees as subject matter experts (e.g. water resource management, packaging, nutrition)

Spadel ensures that:

- All contributions are compliant with applicable laws
- Contributions are aligned with its sustainability commitments

3. Material Lobbying Positions

Spadel engages in public policy discussions on topics that are material to its business and to society.

A. Climate Action

Spadel supports ambitious and science-based climate policies.

Key positions:

- Advocate for robust greenhouse gas emissions reduction frameworks aligned with the Paris Agreement
- Support transparency and disclosure of corporate emissions across value chains
- Promote policies accelerating:
 - Renewable energy adoption
 - Low-carbon production and logistics
- Encourage circular economy solutions to reduce environmental footprint

Engagement channels:

- Participation in industry federations and climate initiatives
- Contributions to consultations at EU and national levels

Alignment:

- UN SDG 13 – Climate Action
- BCorp Climate Action impact area

B. Protection of Water Resources

As a natural mineral water company, water stewardship is central to Spadel's advocacy.

Key positions:

- Advocate for strong protection of natural water sources and recharge zones
- Support integrated water resource management policies at watershed level
- Promote sustainable abstraction practices based on scientific assessments
- Encourage public policies that safeguard water quality from pollution (e.g. nitrates, pesticides, PFAS)
- Support long-term preservation of biodiversity around water catchments

Engagement channels:

- Collaboration with local authorities and environmental organizations

- Participation in water stewardship platforms

Alignment:

- UN SDG 6 – Clean Water and Sanitation
- BCorp Environment & Natural Resource stewardship

C. Health and Nutrition

Spadel promotes healthier hydration habits.

Key positions:

- Support policies encouraging consumption of water as a primary beverage
- Advocate for transparency in nutritional information
- Support public health initiatives aimed at reducing sugar consumption
- Promote responsible marketing practices, especially towards younger audiences

Engagement channels:

- Industry associations
- Public health consultations
- Partnerships with public stakeholders

Alignment:

- UN SDG 3 – Good Health and Well-being

D. Packaging and Circular Economy

Spadel supports a transition toward fully circular packaging systems.

Key positions:

- Advocate for well-designed deposit return systems (DRS) where relevant
- Support high collection and recycling targets
- Promote use of recycled materials (e.g. rPET)
- Encourage eco-design and reduction of packaging materials
- Support harmonized European frameworks to increase efficiency

Engagement channels:

- Packaging and recycling industry bodies
- EU and national regulatory consultations

Alignment:

- UN SDG 12 – Responsible Consumption and Production

4. Intermediary Organizations

Spadel engages in public policy through selected industry and multi-stakeholder organizations.

These may include:

- Beverage industry federations
 - EU : Natural Mineral Waters Europe
 - BE : Belgian Federation of Bottled Water and Soft Drink (FIEB-VIWF) and Belgian Food Industry Federation (FEVIA)
 - NL : Dutch Belgian Federation of Bottled Water, Soft Drinks and Juices (FWS)
 - FR: French Mineral Water Federation (Maison des Eaux Minérales Naturelles)
 - BG: Bulgarian Soft Drinks Association and Food Drink Bulgaria
- Packaging and recycling alliances
 - EU: Petcore Europe
 - BE: Essenscia
- Environmental and water stewardship platforms like Alliance for Water Stewardship
- Business sustainability networks
 - BE: The Shift
 - NL: MVO Nederland

Spadel applies the following principles:

- Alignment with Spadel's values and sustainability objectives
- Regular review of memberships and positions
- Constructive engagement where differences arise

5. Governance and Oversight

Spadel ensures oversight of lobbying and advocacy activities through:

- Internal review processes
 - Senior management supervision
 - Alignment with ESG and sustainability strategy
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