

Responsible Marketing and Public Relations Policy – Spadel Group



Spadel

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1 Introduction

Spadel's purpose is to connect people and nature, for a healthier life, today and tomorrow. It reflects who we are as a family-owned group, rooted in natural water sources and committed to acting locally, responsibly and with respect for people and the environment.

As a company operating in the **natural mineral and spring waters and natural beverages industry**, and acting for a more sustainable and healthier hydration, we recognize our influence on consumers and our responsibility to communicate truthfully about any environmental, health and social topics.

This Responsible Marketing and Public Relations Policy establishes the principles and requirements that ensure all marketing and public communication by Spadel are ethical, transparent, socially responsible, and environmentally accurate.

2 Scope

This policy applies to:

- All business units and subsidiaries of Spadel
 - All employees and contractors involved in marketing, branding, consumer communication, digital engagement, packaging communication, and public relations
 - All external partners, including marketing and communication agencies, consultants, influencers contracted by Spadel, design firms, and public relations firms
 - All communication channels, including packaging, advertising, digital media, events, sponsorships, press releases, and corporate reports
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3 All Audiences

This policy applies to communications directed toward **all consumer groups, communities, regulators, media, employees**, and **other stakeholders**, regardless of age, demographic profile, or geographic location.

4 Environmental, Health and Social Claims

All environmental, health and social claims must be compliant with applicable European and national legislations, and local codes of conduct from advertising self-regulation associations (see Annex 1).

Particular attention goes to the following:

- Claims must be **accurate**, verifiable and supported by reliable or scientific source. This means claims must be evidence-based, using for example scientific studies, certified audits or verified operational data.
- Claims are **proportional** to the company's actions. Communication claims must reflect the actual scale of the Spadel's efforts.
- Claims accurately reflect their **applicable scope** and are relevant to the company's impact to avoid misleading the audience. Claims must clearly specify:
 - Whether they apply to a specific product, production site, the whole company or other
- Any limitations or conditionsA truthful, transparent, and balanced communication. Making sure that claims are **relevant** to Spadel's material impacts, and cover the progress status on its social and environmental strategies.
- Ethical use of sensitive channels and practices. Spadel will:
 - Avoid marketing that targets vulnerable groups in inappropriate contexts
 - Use influencer marketing responsibly. Including mandatory disclosure via a hashtag (e.g. #ad, #sponsored) or any other mention precising this a sponsored collaboration, with guidance from local codes of conduct from advertising self-regulation associations.
 - Refrain from manipulative digital techniques (e.g., dark patterns)
- Using clear, accessible, **consumer-level language**. By using simple, non-technical language appropriate to general consumer understanding, in the prevalent languages where Spadel markets or operates (unless required by legislation).

5 Accountability at the Executive Level

The most senior level in the company's organization that is accountable for the implementation of the policy is a member of the Executive Committee (ExCom).

The Group Brand, Innovation and Sustainability Director ensures that the Responsible Marketing and Public Relations Policy stays relevant, active, and aligned with Spadel's values, and legal and operational perspectives.

6 Communication and Accessibility to Workers

This policy will be:

- Distributed to relevant (i.e. staff involved in marketing and communications) employees via internal communication channels
- Accessible at all times on the Company's intranet or policy library
- Shared with all external agencies and partners as a contractual requirement

Mandatory training will be provided when appropriate to all staff involved in marketing and communications.

7 Approval by Executive Leadership

This policy has been:

- **Reviewed** by the Sustainability, Marketing, and Legal departments
- **Approved** by the Company's **Executive Committee**

Approval date: **June 17th 2026**

Next review: **Annual**, or earlier if standards or regulations change.

Annex 1: list of local self-regulation associations and applicable codes

JEP for Belgium:

- **NL**
 - [De reclame code voor voedingsmiddelen \(The Belgian Food Advertising Code\)](#)
 - [Milieureclamecode](#)
 - [Code inzake identificatie van commerciële communicatie door influencers en content creators](#)
- **FR**
 - [Le code de publicité pour les denrées alimentaires \(The Belgian Food Advertising Code\)](#)
 - [Code de la publicité écologique](#)
 - [Code relatif à l'identification des communications commerciales par les influenceurs et créateurs de contenu](#)

Stichting Reclame Code (SRC) for the Netherlands:

- [Reclamecode voor voedingsmiddelen \(RVV\)](#)
- [Code voor Duurzaamheidsreclame \(CDR\)](#)
- [Reclamecode Social Media & Influencer Marketing \(RSM\)](#)

Autorité de Régulation Professionnelle de la Publicité (ARPP) for France:

- [Recommandation Comportements alimentaires v4](#)
- [Recommandation Développement durable v3](#)
- [Recommandation Communication publicitaire numérique v5](#)

Bulgarian Advertisers Association for Bulgaria:

- [WFA_Guide to Inclusive Insights_February 2026.pdf](#)
- [WFA_Global Guidance Influencer Marketing-2.pdf](#)
- [Global Guidance Env claims 09 2022.pdf](#)