

Policy on Advocacy – 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 are convinced that companies can and should deliver answers to environmental and social challenges, while creating both shareholder and stakeholder value.

Through advocacy Spadel aims to build common ground, drive engagement and action between stakeholders, with a view to developing solutions to some of the challenges facing our society, in line with Spadel's Purpose.

Accountability, integrity and responsibility are fundamental in working collectively with stakeholders to have a positive impact on health, social and environmental challenges.

2 Definition & Scope

For the purpose of this policy, "advocacy" and "lobbying" are considered interchangeably and refer to activities carried out by, or on behalf of, an organized group that include:

- Communicating directly or indirectly with public officials, policymakers, or their representatives with the aim of influencing public decision-making; and/or
- Seeking to influence public opinion, directly or indirectly, beyond normal advertising and marketing practices, to shape public decision-making.

This policy applies equally to all Spadel entities, all employees and executives involved in public affairs or advocacy as well as any third parties acting on Spadel's behalf.

3 Key Principles Guiding Spadel's Advocacy

Advocacy by Spadel should:

- **contribute to positive societal and environmental impact.** In line with Spadel's B Corp commitment and associated change in Spadel's bylaws, we aim to create both shareholder and stakeholder value. Advocacy and actions aimed at positive impact are inspired by Spadel's Purpose, Generation 2030 Strategy and B Lab Standards.
- **be accurate, truthful, verifiable and supported by reliable or scientific data.** This means positions must be evidence-based, using for example scientific peer-reviewed studies, verified operational data, or recognised expert sources. Where scientific uncertainty exists, Spadel applies the precautionary principle.
- **be conducted in a responsible way.** Advocacy activities undertaken by Spadel employees or third parties on its behalf are required to always comply with all applicable laws and regulations. As for any other activity, any action undertaken in the context of advocacy must also comply with Spadel's Code of Conduct – which includes guidance on anti-corruption and bribery, and political contributions.
- In addition, Spadel **commits to transparency** by publicly disclosing a summary of the company's material lobbying positions and the relevant recipients or intermediary organizations yearly.

4 Ensuring alignment with intermediary organisations

Spadel works with a number of different partners, including trade associations and industry groups, to have a greater impact through collective action. We recognize that these groups can both enable strong collective action and, at times, constrain the adoption of ambitious positions and commitments.

When engaging through trade associations or third parties, Spadel:

- Assesses alignment between the association's positions and Spadel's sustainability commitments;
- Uses its influence to promote positions consistent with positive societal and environmental impact;
- Periodically reviews memberships and may reconsider participation where persistent misalignment remains.

5 Addressing stakeholder concerns and grievance channels

Spadel's Whistleblowing Policy (available internally and externally via every Spadel controlled website) ensures that any Spadel employee or external party (e.g. customers, suppliers, affected communities ...) can report illegal, dishonest or wrongful conduct such as (but not limited to):

- a crime or a misdemeanour;
- a breach of applicable laws, regulations and/or international treaties;
- breach of Spadel's contractual commitments;
- an infringement of Spadel's Code of Conduct and/or other policies and procedures;
- any other type of unethical or dishonest behaviour.

Various internal and external (via <https://whistleblowersoftware.com/secure/EthicSpadel>) channels are available to report concerns, anonymously, if necessary.

6 Governance and Oversight

- The CEO and Country Directors hold ultimate responsibility for Spadel's lobbying approach.
 - Lobbying positions are coordinated by the relevant Public Affairs functions.
 - Engagement on high impact, sensitive, or strategic topics requires documented internal alignment and approval.
 - Practical controls are carried out by Spadel's internal audit team (following a decision by the Audit Committee) and/or Spadel's Legal Team in response to concerns raised via the Whistleblower procedure, or by own initiative in case of suspected non-compliance.
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7 Communication to Workers and Revising Policy

This policy will be:

- Distributed to relevant employees via internal communication channels
- Accessible at all times on the Company's intranet or policy library

Spadel periodically reviews:

- Its advocacy activities;
- The continued relevance of this policy;
- Alignment with B Corp standards and evolving societal expectations.

This policy is updated as needed to reflect best practices and regulatory developments.

8 Approval by Executive Leadership

This policy has been:

- **Reviewed** by the Corporate Affairs, and Sustainability departments
- **Approved** by the Company's **Executive Committee**

Approval date: **June 17th 2026**

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