Good Group ESRS Brewery (International) Limited

EY Illustrative Sustainability Statement in accordance with European Sustainability Reporting Standards (ESRS)

For the reporting period 1 January 2025 to 31 December 2025

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Foreword

Welcome to the first edition of 'EY Illustrative Sustainability Statement of Good Group ESRS Brewery (International) Limited' (referred to as 'the Group'), developed to assist entities in meeting the requirements of the European Corporate Sustainability Reporting Directive (CSRD), focusing on the disclosure requirements in the current set of European Sustainability Reporting Standards (ESRS) effective as of 1 January 2024.

The CSRD, including the ESRS, has been established to require entities in the European Union (EU) to disclose information regarding their material impacts, risks and opportunities in relation to environmental, social, and governance sustainability matters. The ESRS intends to enable users of the sustainability statement to understand an entity's material impacts on people and the environment and the material effects of sustainability matters on an entity's development, performance and position. Although various entities have previously reported voluntarily under the Taskforce on Climate-related Financial Disclosures (TCFD), the Global Reporting Initiative (GRI) or other similar frameworks, the introduction of the ESRS brings a new focus and expectation to these disclosures. At the time of writing, the ESRS is under revision by EFRAG which aims to structurally revise the standards as part of the EU Omnibus initiative. We welcome revising and simplifying ESRS also with an opportunity to further support interoperability with global reporting standards. Amended standards are potentially applicable from FY 2026 or later. Many 2024 ESRS sustainability statements have been published in the EU, and entities have invested tremendous effort to publish ESRS-compliant and externally assured sustainability statements. Significant variation in reporting practices among first-time adopters was observed. We expect that sustainability-related financial disclosures prepared in accordance with the ESRS will evolve as familiarity with the requirements improves and reporting practices mature. As such, we expect that the disclosures illustrated in this publication will also evolve and mature in future editions of this or related publications.

Sustainability-related impacts, risks and opportunities are rapidly reshaping the global business environment, compelling entities to adapt their current business strategies and models and to enhance the transparency of their sustainability reporting. As the urgency to address sustainability challenges grows, stakeholders expect companies to provide clear, actionable and comprehensive disclosures on how they impact sustainability matters and how sustainability-related matters affect their development, performance and position. Connectivity with information in the financial statements is important which should include sufficient information on sustainability related risks and other uncertainties.

This publication provides illustrative examples of the sustainability-related disclosures by an entity applying ESRS in its second year, focusing on *ESRS 2 General disclosures*, *ESRS E1 Climate change*, *ESRS S1 Own workforce* and *ESRS G1 Business conduct*. The illustrative example provided in this publication is designed to support entities in navigating these requirements and to demonstrate how sustainability-related information can be effectively communicated to stakeholders.

We trust this publication will prove useful when preparing your sustainability statement.

Michiel van der Lof

EY Global Corporate Reporting Services Leader

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1. Introductory notes

1.1. Background of this document

This publication contains an illustrative sustainability statement for Good Group ESRS Brewery (International) Limited (the parent) and its subsidiaries (the Group) for the year ended 31 December 2025 and is prepared in accordance with the ESRS as published in the Commission Delegated Regulation 2023/2772 of 31 July 2023. The Group is a fictitious, publicly listed beverage company with the parent entity incorporated in the fictitious EU member state of Euroland[1]. The judgements applied and conclusions reached are based on the fictitious specific circumstances of the Group. No judgements or conclusions can be reached or inferred from the detail of the disclosed information in this illustrative report. The presentation currency of the Group is the Euro (€).

This publication illustrates an entity that is in its second year of application of the ESRS.

Objective

The reporting requirements of the ESRS are extensive and have triggered a significant increase in the scale and scope of sustainability reporting for many companies.

Organizing this information into a coherent sustainability statement, especially where it covers new topics not previously disclosed, can pose a challenge for preparers.

How to use this illustrative sustainability statement

Users of this publication are encouraged to use this document to inform how they might prepare their own disclosures to comply with the requirements of the ESRS. The assessments and judgements made in preparing the Group's disclosures are specific to the fictitious facts and circumstances of the Group and its value chain. Therefore, a company applying the ESRS may need to include additional or different disclosures, and the content of those disclosures will be based on the facts and circumstances of that specific company and its value chain. Additionally, this publication aims to provide extensive illustrations, which may result in detailed information. Therefore, companies should assess the materiality of the information to be included, ensuring it remains concise while meeting the necessary requirements.

References have been included throughout the document to denote the ESRS disclosure requirements to which illustrative disclosures correspond. The notations include the ESRS reference, the disclosure requirement, and the individual paragraph reference, including sub-paragraphs, as appropriate. For example, ["ESRS-2_BP-1_5b(ii)"], refers to the disclosure requirement within ESRS-2, BP-1, paragraph 5b(ii): "for consolidated sustainability statements…where applicable, an indication of which subsidiary undertakings included in the consolidation are exempted from individual or consolidated sustainability reporting pursuant to Articles 19a(9) or 29a(8) of Directive 2013/34/EU".

Commentary boxes in yellow are part of the Group's illustrative sustainability statement and have been included to explain the Group's methodology to calculate or measure the specific data points required by the ESRS.

In addition, commentary boxes in light grey have been included to provide context where specific disclosures have been made in respect of the Group's particular circumstances. These commentary boxes also indicate where illustrative disclosures have not been provided or where there is a choice of disclosure options.

This illustrative sustainability statement is designed to provide an illustrative view of what a sustainability statement could looklike and to highlight key considerations relating to the structure and format of different sections of a sustainability statement. It is the responsibility of the reporting entity to ensure that its ESRS disclosures are compliant with the applicable legal and jurisdictional requirements and that they accurately represent the existing sustainability commitments and achievements.

1.2. Introduction to CSRD and ESRS

CSRD

The CSRD entered European Union (EU) law in January 2023, requiring companies operating in the EU to disclose information on the sustainability-related risks and opportunities they face and the impacts they have on society and the environment. It was developed as part of the European Green Deal, aiming to increase the scope and standardisation of sustainability reporting among companies. EU countries need to implement the CSRD in their jurisdiction by transposing the CSRD into national law. At the time of writing, the CSRD is not

[1] The fictitious name used in this publication is not associated with any existing brands or companies.

implemented into national law in all member states. Entities in a member state that implemented the CSRD into national law should review the transposed CSRD in the member state where they are expected to report, where available, as this may require the application of additional considerations and/or reporting requirements. This document has been prepared on the basis that CSRD has been transposed in Euroland, without amendment.

The practical application of the CSRD requirements is staggered, with large and listed companies that are already subject to the Non-Financial Reporting Directive (NFRD) coming into scope for reporting periods beginning in 2024.

The CSRD replaces and expands upon the earlier NFRD, replacing the existing requirements with more prescriptive requirements, applying to a much wider range of companies. It is designed to address the growing demand for reliable and comparable sustainability information from investors, consumers and other stakeholders. In-scope companies need to publish a sustainability statement that meets the requirements of the ESRS, as part of their management report.

ESRS

ESRS are the reporting standards against which companies in scope of the CSRD must report, and they are developed by the EFRAG. The first 12 ESRS were adopted as delegated acts by the European Commission in July 2023 and were published in the Official Journal in December 2023. This includes two general 'cross-cutting' standards (*ESRS 1 General Requirements* (ESRS 1) and *ESRS 2 General Disclosures* (ESRS 2),) and ten topical standards, covering a range of environmental, social, and governance (ESG) topics. These standards apply to all companies, regardless of the sectors in which they operate.

Preparation of the illustrative sustainability statement

In the development of these illustrative ESRS disclosures, the implementation guidance provided by the EFRAG and the European common enforcement priorities for 2024 as issued by the European Securities and Markets Authority (ESMA) has been referred to. These sources offer insights and recommendations on best practices for sustainability reporting, which have been instrumental in shaping the structure and content of the illustrative sustainability statement.

EU Omnibus: proposed substantive changes

The EU Omnibus Package was published on 26 February 2025, and it proposes substantive amendments to the CSRD, aimed at simplifying reporting requirements[2]. Under the proposed changes, the existing ESRS will be revised and streamlined to reduce the number of mandatory data points with a focus on prioritising quantitative data over narrative disclosures, clarifying provisions and improving consistency with other legislation. In addition, previously expected sector-specific standards will no longer be introduced. The EU Omnibus Package has yet to be finalised through the EU legislative process. The illustrative sustainability statement presented in this document has, therefore, been prepared in compliance with the reporting requirements in force at the time of preparation, such that the document reflects the full application of the ESRS as they currently stand, because the impact of the Omnibus Package is not known at this time.

Double Materiality Assessment

The Double Materiality Assessment (DMA) is a mandatory exercise that all reporting entities must undertake in order to comply with the ESRS. Double materiality is a central concept underpinning any sustainability statement in accordance with the ESRS, recognising the importance of considering the materiality of sustainability matters, from two perspectives, as outlined by the EFRAG Guidance:

1. **Financial materiality**: A sustainability matter is material from a financial perspective if it generates risks or opportunities that affect (or could reasonably be expected to affect) the undertaking's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium- or long-term.
2. **Impact materiality**: A sustainability matter is material from an impact perspective when it pertains to the undertaking's material actual or potential, positive or negative impacts on people or the environment over the short-, medium- and long-term. A material sustainability matter from an impact perspective includes impacts connected with the undertaking's own operations, its upstream and downstream value chain, including impacts through its products and services, as well as through its business relationships.

[2] EU Omnibus Package

Double materiality requires companies to report on how they assess and manage both the material financial implications of sustainability-related issues and their broader material impacts on society and the environment as part of their core business strategies and reporting practices.

In addition, the DMA requires entities to disclose how they engage with all relevant stakeholders in their value chain, such as employees, customers, suppliers, communities, regulators, and NGOs. This is a change from traditional mandatory financial reporting, promoting a more comprehensive and integrated approach to disclosures and broadening the focus to emphasise the importance of sustainability, stakeholder engagement, and long-term value creation.

Conducting a DMA is a critical first step in preparing a sustainability statement in accordance with the ESRS. It determines the material impacts, risks, and opportunities (IROs) that a reporting entity must consider when meeting all disclosure requirements in the ESRS that are applicable to the reporting entity. This step is crucial, as the rest of the report will be shaped by the material IROs identified at this stage.

Reporting entities should consider the list of sustainability matters included in *ESRS 1, Appendix A, Application Requirement 16 Sustainability matters to be included in the materiality assessment* when performing their DMA as well as circumstances specific to the entity.

Each year, reporting entities will need to revisit and reassess their materiality determinations to ensure that their disclosures remain relevant and responsive to the latest sustainability impacts, risks or opportunities. This ongoing process ensures that organisation entities continue to reflect current emerging trends, regulatory changes, and stakeholder concerns in their disclosures.

In the case of this illustrative sustainability statement, the DMA process has been simulated to create an illustrative list of IROs.

Assurance

The CSRD mandates that all sustainability-related disclosures, including the DMA, are subject to assurance. Limited assurance is required at present, and it is expected that the proposed changes under the Omnibus package would remove the requirement to move to reasonable assurance in future years.

1.3. Disclaimers

Second year disclosures

The illustrative sustainability statement presented in this document provides an example of a second-year sustainability statement and has been written to reflect the specific fictitious set of facts and circumstances of the Group. An entity applying the ESRS will need to include additional and/or different disclosures based on the facts and circumstances of that specific entity, such as size, geographic presence, and the nature of the entity's operations. This set of disclosures is not exhaustive and should not be construed as definitive or applicable to all entities or circumstances.

Scope of the illustrative sustainability statement

The illustrative sustainability statement presented in this document is designed to represent potential reporting practices under the ESRS. The document is intended to serve as an example for entities that are preparing to comply with the requirements of the ESRS and should not be construed as comprehensive or definitive guidance.

It is important to note that while this illustrative sustainability statement focuses on the ESRS, there are several other sustainability regulations and frameworks that may impact reporting practices in the future.

Users of this illustrative sustainability statement should exercise their own judgment in determining the applicability of any specific information or other voluntary and mandatory frameworks to their own reporting context. Readers are encouraged to stay informed about the latest regulatory updates and to prepare for the integration of additional sustainability reporting requirements as they are enacted.

This publication provides illustrative examples of the disclosures required in the application of the first set of the ESRS, focusing on ESRS 1, ESRS 2, *ESRS E1 Climate change* (ESRS E1), *ESRS S1 Own workforce* (ESRS S1), and *ESRS G1 Business conduct* (ESRS G1). For the purpose of illustration, disclosures in accordance with other topical standards have been omitted in this publication even if the Group identifies the relevant topics as material.

In addition, this illustrative sustainability statement focuses only on the ESRS requirements and does not include the disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) or any other requirements of the CSRD. Furthermore, this sustainability statement does not provide figures in all instances, but instead uses XXX, etc.

References

In the context of these illustrative disclosures, the Group refers to the entity's consolidated financial statements to demonstrate how certain sustainability-related information may be presented and integrated with financial data. A complete set of financial statements has not been developed. In practice, when preparing sustainability-related disclosures, reporting entities will be expected to provide a comprehensive set of financial statements that is aligned with the sustainability information disclosed in accordance with the ESRS requirements. The references made here are solely for the purpose of illustration and should be viewed as examples of connectivity between sustainability-related disclosures and financial reporting. Readers should ensure that they refer to their own financial statements and tailor their sustainability-related disclosures accordingly to meet their specific reporting obligations.

Application date

This illustrative sustainability statement applies the ESRS that were in issue as of July 2023 and effective for annual periods beginning on or after 1 January 2024. This illustrative sustainability statement does not consider the "quick fix" amendments to the ESRS 1 Appendix C ("List of phased-in disclosures requirements") implemented by a Delegated Act, adopted by the European Commission on 11 July 2025, which extend the phased-in provisions beyond the first year of preparation. While an entity that is in its second year of application of the ESRS is not required to apply the extended phased-in disclosure requirements, this illustrative sustainability statement provides examples of these disclosures for entities that elect to report them voluntarily. It is important to note that this illustrative sustainability statement will be required to be updated as standards are issued and/or revised. Users of this publication are advised to monitor any changes in requirements of the ESRS between 29 July 2025 and the date on which their sustainability statement is authorised for issue.

Assurance

The illustrative sustainability statement presented in this document has not been subject to assurance and no illustrative assurance statement has been included.

Good Group ESRS Brewery (International) Limited Sustainability Statement

2. General information

Commentary on the ESRS sustainability disclosures

References to the ESRS data points in this sustainability statement are included for illustrative purposes only. They are not obligatory components of a sustainability statement prepared in accordance with the ESRS.

Guidance in the ESRS that relates to the structure of the sustainability statement

The guidance on how to present the information required by the ESRS is primarily found within ESRS 1. The key requirements are:

- The sustainability statement must be in a **dedicated section of the management report**.
- It must be **readable by both a human and machine**, with a view to enabling disclosures to be digitally tagged, in line with the electronic reporting format required by the Accounting Directive.
- It needs to have **four sections**, in the following order:
  1. General information - ESRS 2 disclosures as well as all disclosures linked to ESRS 2 disclosure requirements*
  2. Environmental information – ESRS E1- E5 disclosures and Taxonomy disclosures
  3. Social information – ESRS S1- S4 disclosures
  4. Governance information – ESRS G1 disclosures
- **Any entity-specific disclosures** should be reflected in the **section that preparers deem most relevant.** When defining its entity-specific disclosures, an entity may adopt transitional measures for the first three years of ESRS application. This can be achieved by complementing its disclosures, prepared based on the topical ESRS, with an appropriate set of additional disclosures to cover sustainability matters that are material for the entity in its sector(s), using available best practice and/or available frameworks or reporting standards, such as IFRS industry-based guidance (as derived from SASB Standards) and GRI Sector Standards.
- Connections and **overlaps with other areas of corporate reporting,** specifically monetary and other quantitative data in the financial statements, **should be explained by reference to the relevant section within the financial statements.**
- **A list of the disclosure requirements should be included,** showing **where in the statement** they can be found. This includes:
  1. The list of disclosure requirements complied with in preparing the sustainability statement (ESRS 1.52)
  2. Appendix B List of EU legislation datapoints
  3. Incorporation by reference table pursuant of ESRS 1.122

** Disclosure requirements related to ESRS 2 SBM-3, which cover the details of the material impacts, risks and opportunities and how they interact with the reporting entity's strategy and business model, can be reflected within the General Information section or alongside related topical disclosures.*

2.1. Basis for preparation

2.1.1 BP-1 General basis for preparation of sustainability statements

The sustainability statement has been prepared in accordance with the European Sustainability Reporting Standards (ESRS, EU 2023/2772) as incorporated into Euroland's local law.

Consolidation

The sustainability statement has been prepared on a consolidated basis [ESRS-2_BP-1_5a] and encompasses the parent company Good Group ESRS Brewery (International) Limited and all its subsidiaries (collectively, the 'Group'). It is prepared for the period 1 January 2025 to 31 December 2025. The scope of consolidation is the same as for the Group's Consolidated Financial Statements [ESRS-2_BP-1_5b(i)] (please refer to 'Note X.2 Basis of consolidation' in the financial statements).

Commentary on the ESRS sustainability disclosures

The ESRS require that a consolidated sustainability statement must disclose, where applicable, an indication of which subsidiaries included in the consolidation are exempted from individual or consolidated sustainability reporting pursuant to Articles 19a (9) or 29a (8) of Directive 2013/34/EU [ESRS-2_BP-1_b(ii)]. In this illustrative sustainability statement, none of the Group's subsidiaries are required to publish a sustainability statement. Therefore, this disclosure has not been illustrated [ESRS-2_BP-1_b(ii)].

Upstream and downstream value chain [ESRS-2_BP-1_5c]

The sustainability statement covers value chain information relating to the Group's direct and indirect business relationships in the upstream and downstream value chain. The entire value chain was considered during the impacts, risks and opportunities (IROs) assessment, which is outlined in the statement of material IROs in section 2.4.1. For specific information on Group's value chain please see section 2.3.1.2.

Omission of information

The Group has not omitted information corresponding to intellectual property, know-how or the results of innovation [ESRS-2_BP-1_5d], nor has the exemption for disclosing information on impending developments or matters in the course of negotiation been used [ESRS-2_BP-1_5e].

Commentary on the ESRS sustainability disclosures

ESRS-2_BP-1_5e requires undertakings based in an EU member state to state if they have used the exemption from disclosing impending developments or matters in the course of negotiations, as provided for in articles 19a (3) and 29a (3) of Directive 2013/34/EU.

For the purpose of this illustrative sustainability statement, Euroland allows this exemption. This datapoint is not relevant for undertakings based in an EU member state that does not permit this exemption.

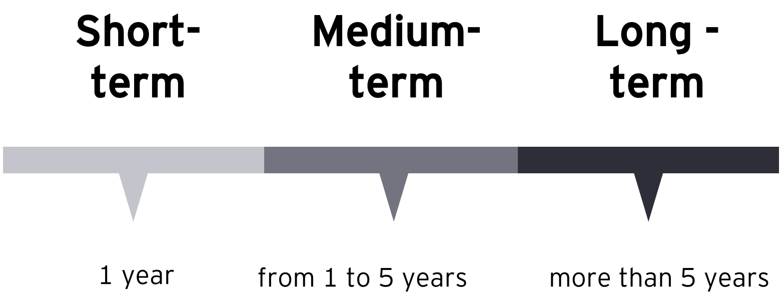
Phased-in provisions

The Group has elected to apply phased-in provisions for ESRS-2_SBM-1_40b (breakdown of total revenue by significant ESRS sectors) and ESRS-2_SBM-1_40c (list of additional significant ESRS sectors) in line with ESRS 1 Appendix C ("List of phased-in disclosures requirements").

2.1.2 BP-2 Disclosures in relation to specific circumstances

Time horizons [ESRS-2_BP-2_9a]

In preparing its sustainability statement the Group has applied the following forward-looking time horizons as defined in ESRS 1:



Commentary on the ESRS Sustainability Disclosures

This illustrative sustainability statement adheres to the time horizons as defined in ESRS 1 section 6.4.

In the event that the undertaking deviates from the ESRS defined medium- or long-term time horizons, it must disclose [ESRS-2_BP-2_9a, b]:

a) Its definitions of medium- or long-term time horizons; and

b) The reasons for applying those definitions.

Value chain estimation

The following table contains the metrics that include value chain data estimated using indirect sources.

Metric	Section	Basis of preparation	Level of accuracy	Planned actions to improve accuracy
Scope 3 GHG emissions [ESRS-2_BP-2_10a]	3.6.2	Scope 3 GHG emissions are calculated using a combination of primary data sources, for example, energy use and transport data, and recognised secondary data sources, such as emission factors and industry-average data. (please refer to more details in section 3.6.2) [ESRS-2_BP-2_10b].	The use of secondary data sources, such as emission factors and industry-average data results in less accurate information than if only primary sources were used. The details of the level of uncertainty are described in section 3.6.2 [ESRS-2_BP-2_10c].	The Group is working to limit the use of secondary data sources with actual data to enhance the accuracy of Scope 3 GHG emissions estimates, by introducing GHG reporting requirements in supplier contracts [ESRS-2_BP-2_10d].

Sources of estimation and outcome uncertainty

The following table contains metrics that are subject to a high level of measurement uncertainty.

Metric	Sources of measurement uncertainty	Assumptions, approximations and judgments applied
Scope 3 GHG emissions [ESRS-2_BP-2_11a]	The calculation technique, which relies on emission factors from sources such as DEFRA or EEIO model databases and on industry-average data, introduces an element of inherent measurement uncertainty as these are generalised estimates rather than precise, source-specific values [ESRS-2_BP-2_11b(i)].	Please refer to section 3.6.2 ESRS-2_BP-2_11b(ii)].

Commentary on the ESRS sustainability disclosures

The above table is not intended to be a complete list of the metrics that are subject to a high level of measurement uncertainty. In addition, the list is also not intended to be a complete list of all sources of measurement uncertainty.

None of the metrics has been validated by another external body, unless specifically mentioned in the topical ESRS sections devoted to respective metrics [ESRS-2_MDR-M_77b].

Changes in preparation or presentation of sustainability information

No changes were made in the preparation and presentation of sustainability information compared to the previous reporting period [ESRS-2_BP-2_13a].

Commentary on the ESRS sustainability disclosures

In this illustrative sustainability statement, there were no changes in the preparation or presentation of sustainability information.

If changes in the preparation and presentation of sustainability information occur compared to the previous reporting period(s), the undertaking must ESRS-2_BP-2_13:

(a) Explain the changes and the reasons for them, including why the replaced metric provides more useful information;

(b) Disclose revised comparative figures, unless it is impracticable to do so. When it is impracticable to adjust comparative information for one or more prior periods, the undertaking shall disclose that fact; and

(c) Disclose the difference between the figure disclosed in the preceding period and the revised comparative figure.

Reporting errors in prior periods [ESRS-2_BP-2_14a]

No reporting errors in prior periods were identified.

Commentary on the ESRS sustainability disclosures

In this illustrative sustainability statement, no errors were identified in prior period reporting and, as such, information about the correction of errors is not disclosed.

If prior period errors are identified, the undertaking must disclose ESRS-2_BP-2_14:

(a) The nature of the prior period material error;

(b) To the extent practicable, the correction for each prior period included in the sustainability statement; and

(c) If correction of the error is not practicable, the circumstances that led to the existence of that condition.

Disclosures stemming from other legislation or generally accepted sustainability reporting standards and frameworks [ESRS-2_BP-2_15]

This sustainability statement does not contain information arising from other legislations or generally accepted sustainability reporting standards and frameworks.

Commentary on the ESRS sustainability disclosures

This illustrative sustainability statement does not contain information arising from other legislation or generally accepted sustainability reporting pronouncements.

If such information is included, that fact should be disclosed and where there is partial application of other reporting standards or frameworks, the precise reference to the paragraphs of the standard or framework applied shall be provided.

Incorporation by reference [ESRS-2_BP-2_16]

To enhance the readability of the sustainability statement the Group incorporates certain information by reference to another section of the Management Report. The table below provides a list of the disclosure requirements which are incorporated by reference:

ESRS	ESRS disclosure requirement	Data Points	Information	Section of the Management Report
2	GOV-1	21	Information about the composition and diversity of the members of the administrative, management and supervisory bodies	XXX
2	GOV-1	23 (b)	Information on how the administrative, management and supervisory bodies' skills and expertise relate to the	XXX

ESRS	ESRS disclosure requirement	Data Points	Information	Section of the Management Report
			Group's material impacts, risks and opportunities.	
2	IRO-2	56	List of disclosure requirements complied with in preparing the sustainability statement and table of all datapoints that derive from other EU legislation.	Appendix A
G1	GOV-1	5 (b)	Expertise of the administrative, management and supervisory bodies on business conduct matters.	XXX

Commentary on the ESRS sustainability disclosures

The above referred elements incorporated by reference are not included in this illustration.

Please note that disclosures incorporated by reference must meet the requirements of ESRS [ESRS-1_120], as follows:

(a) Constitute a separate element of information and be clearly identified in the document concerned as addressing the disclosure requirement

(b) Be published at the same time as the management report;

(c) Be in the same language as the sustainability statement;

(d) Be subject to at least the same level of assurance as the sustainability statement;

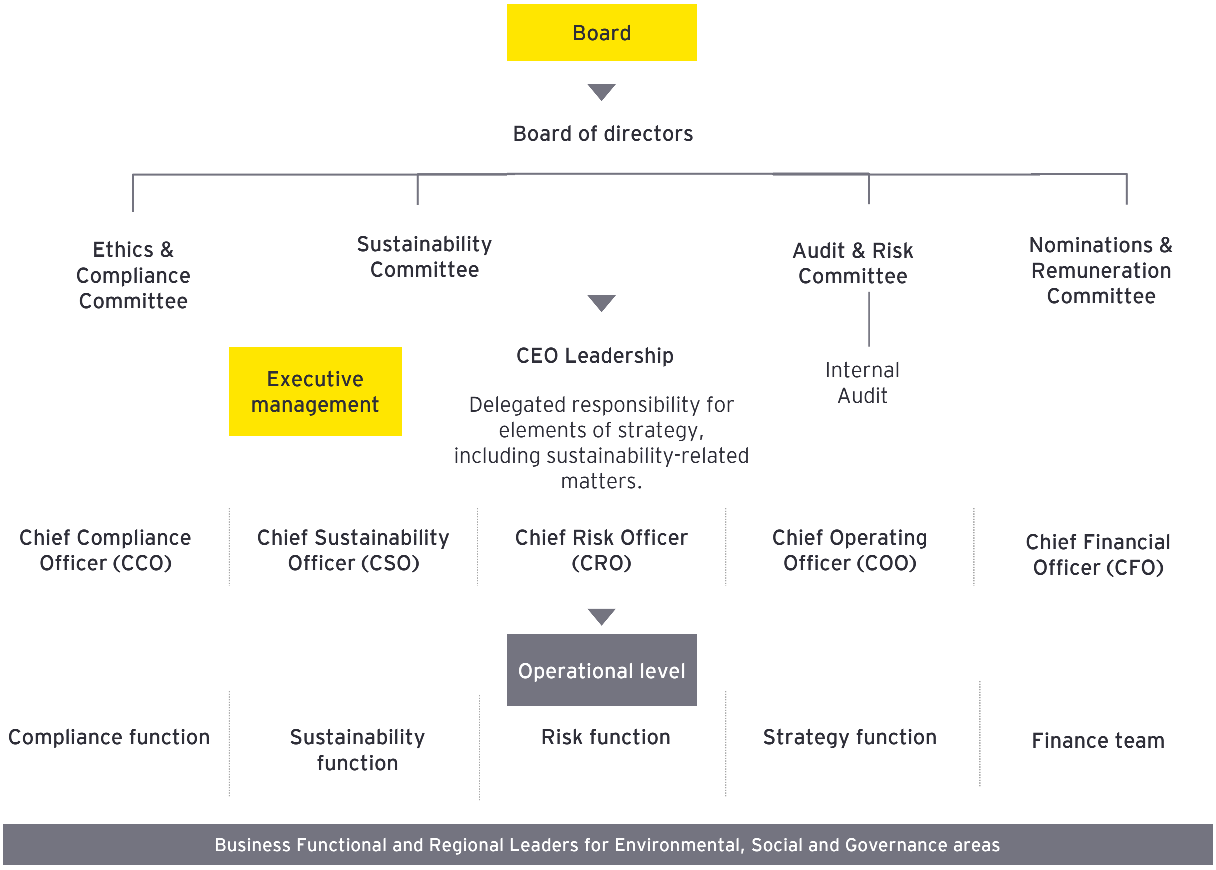
(e) Meet the same technical digitalisation requirements as the sustainability statement.

In addition, entities that are planning to meet any disclosure requirements through incorporation by cross-reference should be mindful that the conditions as listed in ESRS-1_119 are met and, in particular, should consider the implications this could have in relation to the scope of assurance required over ESRS disclosures. If the statement or section of the statement to which the disclosures refer, is not currently subject to at least limited assurance, those disclosures will need to be factored into the scope of assurance, in addition to the ESRS sustainability statement.

This illustrative sustainability statement does not apply the phased-in provision that allows undertakings or groups not exceeding on its balance sheet the average number of 750 employees during the financial year to omit the information required by *ESRS E4 Biodiversity and ecosystems* (ESRS E4), ESRS S1, *ESRS S2 Workers in the value chain* (ESRS S2), *ESRS S3 Affected communities* (ESRS S3), or *ESRS S4 Consumers and End-users* (ESRS S4).

2.2. Governance

2.2.1 GOV-1 The role of the administrative, management and supervisory bodies



The role of the Board

The Board holds the overall leadership responsibility for sustainability, including oversight of impacts, risks and opportunities, determining strategies designed to respond to the identified impacts, risks and opportunities, setting related targets and overseeing their integration into the business model and strategy [ESRS-2_GOV-1_22a].

As part of the annual strategic planning cycle, the Board conducts a formal review and approval of all proposed targets. These targets are grounded in the DMA. Once validated, targets are aligned with the Group's overarching sustainability vision and cascaded across relevant functions and business units to support implementation. The Board meets every quarter to discuss the Group's impacts, risks and opportunities and reviews sustainability performance and progress in the business and subsidiaries towards achieving their targets [ESRS-2_GOV-1_22d]. This includes the outcomes of internal audits, the analyses of risks, the effectiveness of mitigation strategies, and any necessary corrective actions needed for sustainability-related matters.

For a description of the governance structure set up specifically for the DMA process, please see section 2.4.2.

Committees in place to support Board oversight

Each committee has its own terms of references which describe the scope of its decision making and responsibilities, details of which are described below [ESRS-2_GOV-1_22b].

- **Audit & Risk Committee**

This Committee assists the Board in overseeing and reviewing emerging and strategic risks, including sustainability-related impacts and risks. The Audit & Risk Committee meets monthly and is responsible for overseeing the Group's risk management and internal control systems, alongside monitoring the development of internal controls over sustainability-related data and their effectiveness. The Board receives all Audit and Risk Committee meeting minutes for review, which include details on impacts, risks, opportunities and internal controls as they pertain to sustainability-related matters.

The Audit & Risk Committee plays an important role in overall risk management, by monitoring and approving the risk assessment on an aggregated level.

- **Ethics & Compliance Committee**

The Ethics & Compliance Committee assists the Board in upholding responsible business conduct across the Group. It oversees the implementation and effectiveness of the Group's compliance framework, including the Code of Conduct, anti-corruption controls, and whistleblowing mechanisms. It monitors ethical risks, including those associated with business partners, and ensures that compliance standards are embedded in daily operations and decision-making processes.

- **Nomination & Remuneration Committee**

This Committee assists the Board with overseeing matters in relation to candidate succession planning and determining criteria required for Board membership, which includes experience and skills relating to sustainability-related matters, thereby allowing for effective governance and oversight of sustainability-related matters.

In addition, this Committee assists the Board in overseeing measures and outcomes as they pertain to executive remuneration, which includes sustainability-related measures.

- **Sustainability Committee**

The Sustainability Committee assists the Board with overseeing sustainability-related performance, including risk management and monitoring implementation of the Group's strategy, targets and processes as they pertain to sustainability-related matters. This Committee meets quarterly. The CSO and the CFO attend each Sustainability Committee meeting to provide an update on sustainability matters, including detailed coverage of the progress of the Group's sustainability strategy as well as monitoring the planning and metrics relating to sustainability-related impacts, risks and opportunities.

Internal Audit

Internal Audit provides assurance on the effectiveness of the processes used to identify and manage material sustainability-related impacts, risks, and opportunities. These audits are carried out periodically and involve a comprehensive assessment of risk exposures, internal control mechanisms, and the effectiveness of mitigation strategies. Where relevant, recommendations for corrective actions are developed. All findings, including identified vulnerabilities and proposed risk mitigation measures are reported to the Audit & Risk Committee to support informed oversight and decision-making.

Executive Management Team [ESRS-2_GOV-1_22c]

The Board delegates the responsibility of executing strategy, including sustainability-related matters, to the Executive Management Team through role descriptions specifying mandates. The Board has oversight of the relevant roles through the above-mentioned Board committees. The CEO is supported by a team of management executives, which is listed below.

The Executive Management Team works together with the different departments and regions to incorporate ESG considerations into business operations, making sustainability a collective responsibility that is integral to the Group's strategy.

Key roles that are delegated to executives to support Board oversight include

- **Chief Executive Officer (CEO):** responsible for sustainability-related matters at the highest level and is responsible for ensuring that sustainability-related matters are embedded in the Group's core values and long-term strategy.
- **Chief Financial Officer (CFO):** responsible for incorporating sustainability-related considerations into the Group's financial practices and reporting process. This includes responsibility for sustainability-related financial disclosures and ensuring consistency and coherence across financial statements and all other external communications. The CFO plays a key role in aligning financial and sustainability narratives to support transparency and informed decision-making.
- **Chief Sustainability Officer (CSO):** responsible for overseeing sustainability matters [ESRS-2_GOV-1_22c(i)]. The CSO reports to the CEO and is tasked with coordinating the management of sustainability issues, playing a critical role in integrating sustainability into the core operations and strategy of the Group, including the monitoring of the Group's IROs and achievement of related targets [ESRS-2_GOV-1_22d]. The CSO is responsible for the consolidation of Sustainability-related data at the Group level and supervising the Group Sustainability Team which collects the data, validates and reviews it [ESRS-2_GOV-1_22c(ii)].

The CSO prepares a Sustainability Progress Report to be tabled to Sustainability Committee quarterly. This report details progress against the sustainability-related targets and an overview of the specific sustainability-related impacts, risks and opportunities in the period, including any relevant metrics and its progress. The Sustainability Committee (and Nomination & Remuneration Committee) uses this report to evaluate the Executive Management Team's performance in managing sustainability-related impacts, risks and opportunities [ESRS-2_GOV-1_22d].

- **Chief Risk Officer (CRO):** responsible for identifying, assessing and managing risk across the Group, including those related to sustainability-related matters. Also responsible for integration of sustainability-related risk into overall risk management framework to reduce the potential magnitude and consequence.
- **Chief Compliance Officer (CCO)**: responsible for the business ethics compliance programme and integrating sustainability-related matters into the Group's compliance framework to help mitigate risks and enhance reputation.
- **Chief Operating Officer (COO):** responsible for embedding sustainability-related matters into the Group's operations focusing on efficiency, resilience and overall alignment with all other areas of operations.

The Executive Management Team also reviews the IROs before they are presented to the Board.

Term of Reference

Responsibilities for impacts, risks and opportunities are reflected in the respective Terms of Reference – policies and documents that outline the structure, purpose and responsibilities of the bodies. These documents clearly outline the objectives of each body and their individual responsibilities in respect of sustainability, including their roles in identifying, managing, and reporting on sustainability impacts, risks, and opportunities, as outlined above. The Terms of Reference are live documents, which are reviewed regularly (at least annually) to reflect any changes (e.g. resulting from updating the DMA results) [ESRS-2_GOV-1_22b].

Sustainability-related expertise [ESRS-2_GOV-1_23]

All Board and Executive Committee members have knowledge of sustainability, which is self-attested annually. They have expertise in different fields, such as social matters, business conduct or climate change for which material IROs have been identified:

- The Board includes members with diverse backgrounds in environmental science, social governance, and corporate sustainability.
- Audit Committee members contribute knowledge of risk management and regulatory compliance. The Nomination & Remuneration Committee includes professionals experienced in integrating sustainability metrics into executive compensation.
- The Sustainability Committee is composed of specialists in environmental management, social responsibility, and governance.
- The Ethics & Compliance Committee comprises members with demonstrated expertise in corporate ethics, regulatory integrity, and compliance frameworks, contributing to the Group's alignment with sustainability-related conduct standards and responsible business practices.
- The Executive Team has completed specialised training in sustainability management and sustainability reporting with a focus on CSRD and ESRS requirements.

Detailed profiles, background and qualifications of the Board and various Committee members are listed in the Corporate Governance section of the management report [ESRS-2_GOV-1_21c].

In addition to the comprehensive inductions upon appointment, the Group invests in training and development. The members of the administrative, management and supervisory bodies receive annual mandatory training, to continue their development and maintain their knowledge in key areas of focus for the Group, where the topics are determined by strategic priorities. In FY25 these topics included a spotlight on water resources, ESG regulatory development including the ESRS, and corporate governance matters [ESRS-2_GOV-1_23b].

The Group also leverages external experts and consultants to provide additional insights and guidance on complex sustainability issues [ESRS-2_GOV-1_23a]. By facilitating access to sustainability-related expertise for administrative, management, and supervisory bodies, the Group supports the oversight and achievement of its sustainability goals, including managing risks, addressing material impacts, and identifying opportunities [ESRS-2_GOV-1_23b].

Controls and procedures applied to the management of impacts, risks and opportunities [ESRS-2_GOV-1_22c(iii)]

The management of IROs, including metrics and tracking progress towards sustainability targets is integrated into the internal risk management system. The system is based on the Three Lines of Defense model which is described in more details in the Risk Management section of the Management Report.

Findings from risk assessments and internal controls are regularly updated and incorporated into the Group's policies and procedures, supporting a proactive approach to addressing sustainability-related matters.

2.2.1.1. G1 GOV-1 Business conduct

The role of the Group's governance bodies in overseeing business conduct is embedded within the Group's enterprise risk management framework. The Board holds ultimate responsibility for overseeing the Group's approach to business conduct, including ethical standards, anti-corruption measures and compliance with applicable laws and regulations.

The outcomes of business conduct evaluations, including those related to anti-corruption, whistleblowing, and compliance, are regularly reported to the appropriate governance bodies. The Ethics & Compliance Committee reviews, among others, the effectiveness of the Group's Code of Conduct, whistleblower mechanisms, and training programs. The CCO reports directly to the Ethics & Compliance Committee and provides regular updates on business conduct risks, incidents, and mitigation strategies. The CCO also leads the cross-functional Business Conduct Working Group, which includes representatives from various departments (Legal, Human Resources, Procurement). These collaborative actions aim to provide a holistic and proactive approach to responsible business conduct, with cross-functional accountability embedded across governance, operations, and supply chain management [G1-GOV-1_5a].

The expertise of the administrative, management and supervisory bodies on business conduct matters is outlined in the Corporate Governance section of the management report [ESRS-G1_GOV-1_5b].

2.2.2 GOV-2 Information provided to, and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The administrative, management, and supervisory bodies, including the relevant Committees, receive quarterly updates through comprehensive business and operational risk reporting on all sustainability matters (including material impacts, risks, and opportunities as well as the implementation of due diligence, and the results and effectiveness of policies, actions and metrics and targets adopted to address them) [ESRS-2_GOV-2_26a]. The Board and Executive Management Team consider sustainability impacts, risks and opportunities as part of their oversight of the Group's strategy. This includes evaluating how these factors influence major transactions and the overall risk management process. The bodies assess potential trade-offs associated with sustainability impacts, facilitating decisions that balance short-term operational needs with long-term sustainability goals [ESRS-2_GOV-2_26b].

In 2025, the Board considered all material IROs as part of the review of the materiality assessment. An overview of material IROs is included in this sustainability statement in section 2.4.1. Additionally, the following material impacts, risks, and opportunities were given special attention during the reporting period: [ESRS-2_GOV-2_26c]

- Carbon Footprint Reduction: strategies to reduce greenhouse gas emissions and improve energy efficiency.
- Water Efficiency: initiatives to enhance water usage efficiency in brewing processes.
- Diversity, Equity and Inclusion: programs to increase the percentage of women in leadership positions and to promote an inclusive workplace culture.

Commentary on the ESRS sustainability disclosures

The examples listed above are illustrative and do not represent a complete list of all material impacts, risks, and opportunities that could be addressed by the Board. There are many other potential topics that could be discussed in relation to sustainability, and the above disclosure serves as an example rather than an exhaustive list.

2.2.3 GOV-3 Integration of sustainability-related performance in incentive schemes

[ESRS-2_GOV-3_29]

Incentive schemes linked to sustainability matters

There is a Short-Term Incentive Plan (STIP) in place for the Executive Management Team that includes sustainability-related performance criteria.

The terms of all incentive schemes including the applicable sustainability-related performance metrics which are considered as performance benchmarks are set out in the Remuneration Policy [ESRS-2_GOV-3_29c] and approved by the Board [ESRS-2_GOV-3_29e].

As part of the STIP, the performance of the Executive Management team is being assessed against specific sustainability-related targets as included in the table below [ESRS-2_GOV-3_29a, 29b, 29c]. A maximum of XXX% of variable compensation of the Executive Management team is dependent on the sustainability-related targets as listed below [ESRS-2_GOV-3_29d].

Sustainability-related target	Metrics	Proportion of variable remuneration dependent on sustainability-related targets	Short-term target 2025	Result for the 2025 reporting period	Short-term target 2024	Result for the 2024 reporting period
Reducing Scope 1 and 2 GHG emissions (E)	Scope 1 and 2 GHG emissions	XXX%	XXX	XXX	XXX	XXX
Increasing water efficiencies (E)	Water consumption	XXX%	XXX	XXX	XXX	XXX
Diversity, Equity and inclusion: increasing the percentage of women in senior management (G)	Percentage of women in senior management	XXX%		XXX	XXX	XXX

As shown in the table above, climate-related considerations are factored into the remuneration of the Executive Management Team. Their performance is being assessed against the annual progress review towards achieving GHG emission reduction targets as reported under section 3.6.2 [E1_GOV-3_13].

The percentage of the remuneration recognised in the current period that is linked to climate related considerations (GHG emission reduction target in Scope 2) is XXX% [E1_GOV-3_13].

Commentary on the ESRS sustainability disclosures

Information about incentive schemes and remuneration policies for members of administrative, management, and supervisory bodies for listed entities is typically found in the Remuneration Report [ESRS-2_GOV-3_29; ESRS 2 AR7] section of the Management Report. It is common practice to incorporate in the sustainability statement detailed information prescribed by GOV-3 disclosure requirement by reference to that other section of the Management Report [ESRS-1_119].

2.2.4 GOV-4 Statement on due diligence

[ESRS-2_GOV-4_30, 31, 32]

Achieving sustainable business practices is a complex journey that requires careful and continuous efforts throughout all brewing operations. Central to the Group's daily activities is a comprehensive due diligence process, which is an ongoing series of actions designed to identify, prevent, mitigate and account for how the Group addresses the actual and potential negative impacts on the environment and people. This process is fundamental to The Group's business, aiding in the refinement of both strategic and operational aspects.

The Group aims to adhere to the principles outlined in the *United Nations (UN) Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises* in all operations. These international standards provide a framework for responsible business conduct, helping companies to contribute positively to economic, environmental, and social progress.

Following the steps outlined in these UN guidelines, the Group identifies and assesses adverse impacts in operations, the supply chain and in business relationships. Actual and potential negative impacts coming out of these continuous assessments inform the DMA process by identifying key areas of environmental and social impact. Identified impacts are managed accordingly through appropriate measures to mitigate and prevent them, track implementation and communicate transparently. The table below depicts the mapping that explains how and where the application of the main aspects and steps of the due diligence process are reflected in the Group's sustainability statement.

Core elements of due diligence	Sections in the sustainability statement
Embedding due diligence in governance, strategy and business model	SBM-3, GOV-2, GOV-3,
Engaging with affected stakeholders in all key steps of the due diligence	SBM-2, IRO-1, E1-2, S1-2, G1-1
Identifying and assessing negative impacts on people and the environment	SBM-3, IRO-1
Taking actions to address negative impacts on people and the environment	E1-1, E1-3, S1-4, G1-1
Tracking the effectiveness of these efforts and communicating	E1-4, E1-5, E1-6, E1-7, E1-8, E1-9, S1-5, S1-6, S1-8, S1-9, S1-10, S1-13, S1-14, S1-15, S1-16, S1-17, G1-4, G1-5, G1-6

2.2.5 GOV-5 Risk management and internal controls over sustainability reporting

Scope, Main Features, and Components of Risk Management and Internal Control Processes [ESRS-2_GOV-5_36a]

As part of the Group's risk management process, risk management and internal controls encompass all aspects of annual sustainability reporting. These processes include the identification, assessment, and mitigation of inherent material misstatements risks arising among others from potential human error or data incompleteness that could impact the accuracy of sustainability reporting. Key components related specifically to sustainability reporting include:

1. **Risk Identification and Risk Assessment**: systematic identification, assessment and ongoing evaluation of potential risks that could lead to inaccuracies, omissions, or misstatements in sustainability reporting.
2. **Control Activities**: implementation of controls to ensure data accuracy, completeness, and compliance with external reporting standards and internal documents.
3. **Information and Communication:** effective communication channels to ensure that relevant information is disseminated across the organisation.
4. **Monitoring**: regular reviews and internal audits to assess the effectiveness of controls and identify areas for improvement.

Risk Assessment Approach and Prioritisation Methodology [ESRS-2_GOV-5_36b]

The Group's risk assessment approach involves a systematic evaluation of potential risks based on their likelihood and impact. Sustainability reporting related risks are incorporated into the enterprise risk management framework which prioritises risks using a risk matrix that categorises them as high, medium, or low priority. This methodology allows to focus resources on the most significant risks to the sustainability reporting process.

Main Risks Identified and Mitigation Strategies [ESRS-2_GOV-5_36c]

The sustainability reporting process presents several risks, including incompleteness, errors, data inaccuracies, regulatory non-compliance, and operational disruptions. To mitigate these identified risks, internal controls are applied in the reporting streams and a structured framework is in place to support the reliability and accuracy of reported data. Segregation of responsibilities is applied in the reporting process, where data collection, validation, and review are conducted by separate individuals. A key component of this framework is data verification, which includes reconciling reported data with source documents and analysing material differences compared to prior years.

To support regulatory compliance, legislative changes and updates are continuously monitored to achieve alignment with reporting requirements. In addition, contingency plans have been developed to manage potential operational disruptions that could impact reporting processes. Given the reliance on key personnel within the reporting organisation, these measures help address risks related to workforce availability and expertise, supporting consistency in disclosures.

Integration of findings of Risk Assessment and Internal Controls into Internal Functions and Processes [ESRS-2_GOV-5_36d]

As outlined above, the sustainability reporting risks are incorporated into the internal risk management system and the findings from risk assessments and internal controls are integrated into internal functions through regular updates to the policies and procedures. The Group aims to ensure that all departments are aligned with the sustainability reporting objectives and that any identified risks are addressed promptly. The Group also conducts training sessions to keep employees who are involved in the reporting function informed about the latest developments in sustainability reporting.

Periodic Reporting to Administrative, Management, and Supervisory Bodies [ESRS-2_GOV-5_36e]

Internal Audit provides quarterly reports on the findings of the risk assessments and internal audits to the Audit & Risk Committee. Reports include summaries related to the outcomes of conducted internal audits, the analyses of risks, internal control activities, the effectiveness of mitigation strategies, and any necessary corrective actions. This ensures that the Group's leadership is fully informed and can make data-driven decisions to enhance sustainability performance.

2.3. Strategy and business model

2.3.1 SBM-1 Strategy, business model and value chain

2.3.1.1. Good Group ESRS Brewery – Towards a Greener Horizon

The Group's mission is to create exceptional beverages that foster community. Since embarking on the sustainability journey in 2020, the Group has set ambitious goals to enhance environmental and social responsibility practices, integrating these considerations into the core business to create value for people and planet.

The Group offers five alcoholic drinks of varying character and strength, along with three non/low-alcohol alternatives ESRS-2_SBM-1_40a(i)]. The primary markets encompass Euroland (Europe) and Asialand[3] (Asia) [ESRS-2_SBM-1_40a(ii)]. The table below provides information on the headcount per region and revenue per region [ESRS-2_SBM-1_40a(iii), 40b].

Region	Headcount (average during period) [ESRS-2_SBM-1_40a(iii)]	Total Revenue [ESRS-2_SBM-1_40(b)]
Euroland	ZZZ	YYY
Asialand	ZZZ	YYY
Total	ZZZ	YYY

Commentary on the ESRS sustainability disclosures

ESRS-2_SBM-1_40b (breakdown of total revenue by significant ESRS sectors) and ESRS-2_SBM-1_40c (list of additional significant ESRS sectors) are subject to phased-in provisions (as mentioned in ESRS 1 Appendix C). The Group has elected to apply those phased-in provisions.

In addition, ESRS-2_SBM-1_40d requires, where applicable, a statement indicating whether the entity is active in: (i) fossil fuel, (ii) chemicals production, (iii) controversial weapons, and/or (iv) cultivation and production of tobacco, together with the related revenues. In this illustrative sustainability statement, this is not applicable to the Group and is therefore not shown.

In several countries, legal restrictions govern the sale and consumption of alcoholic beverages, ranging from full bans to limitations based on community, region, or specific timeframes. In Euroland, alcoholic beverages can only be consumed by people over the age of 18. The Group strictly adheres to local laws on distribution, ensuring that practices align with local regulations, in order to foster trust with customers and partners [ESRS-2_SBM-1_40a(iv)].

[3] The fictitious name used in this publication is not associated with any existing brands or companies.

The "Towards a Greener Horizon" sustainability strategy reflects the Group's commitment to achieving sustainability-related goals across various dimensions, including reducing its environmental footprint and becoming net-zero, creating an inclusive and respectful workplace and promoting responsible drinking.

With respect to the environment, the Group faces different aspects of both transitional and physical climate risks. These risks are increasingly shaping the operational landscape. To strengthen resilience, the Group is committed to reducing its GHG emissions and becoming net-zero. It aims to reach these goals by, amongst others, replacing the transportation fleet with electric vehicles, improving energy efficiency, switching to electricity from renewable sources, focusing on sustainable logistics and circular packaging. The Group is reformulating its product and optimising the recipes to support energy-efficient brewing processes and replacing high-emission ingredients with lower-impact alternatives. The Group is also focusing on supplier engagement in order to make the necessary sustainable changes along the value chain [ESRS-2_SBM-1_40e, g].

The Group is committed to create an inclusive, respectful and safe workplace for all employees. Work-life balance, diversity, gender equality and health and safety are critical areas of focus. To address these challenges, the Group is implementing the Diversity, Equity, and Inclusion (DEI) strategy and a comprehensive Health and Safety Management System, along with targeted action plans detailed in section 4.3 and 4.5. In doing this, Group acknowledges higher risks in these areas related to the social and legal environment in Asialand [ESRS-2_SBM-1_40e, 40f, 40g].

Responsible drinking is closely related the Group's core business, alcoholic drinks. In order to combat the negative effects from alcohol misuse the Group is dedicated to promoting responsible drinking and providing its customers with non/low-alcoholic alternatives, which also represents a strategic opportunity. As such the Group is expanding its offerings of non-alcoholic and low-alcohol alternatives. This approach not only addresses the growing consumer demand for responsible drinking options but also aligns with the Group's commitment to promoting healthier lifestyles [ESRS-2_SBM-1_40e, 40f, 40g].

Through these efforts, the Group is committed to advancing its sustainability agenda, ensuring that its strategies and initiatives are not only responsive to current challenges but also proactive in shaping a sustainable future.

In 2025, the materiality assessment, as required by the ESRS, identified material impacts, risks, and opportunities (IROs) that confirmed the above different elements of the "Towards a Greener Horizon" strategy (please refer to 2.4.1 for the identified material IROs).

Commentary on the ESRS sustainability disclosures

The above text also references consumers and end-users (responsible drinking), which relate to ESRS 4. Please note, however, that this illustrative sustainability statement only includes disclosures related to ESRS E1, ESRS S1 and ESRS G1 and does not include any further disclosures in respect of ESRS S4.

2.3.1.2. The Value Chain: From Raw Ingredients to Customer Enjoyment

A simplified overview of the Group's value chain is shown below, highlighting the upstream activities – collaboration with local suppliers for sustainable raw materials, the production and administrative operations, and the downstream operations, including distribution, sales and consumption.

At the Group, the upstream stage of the value chain relies on a range of key inputs and collaborative relationships. These include agricultural products such as malted barley and hops, clean water sources, brewing infrastructure. To support the sustainability and resilience of the supply chain, the Group has adopted measures aimed at responsible sourcing and building long-term partnerships with suppliers. For example, partnerships are established with local farmers to promote sustainable agricultural practices, which enhances ecosystem resilience and supports climate adaptation [ESRS-2_SBM-1_42a, 42c].

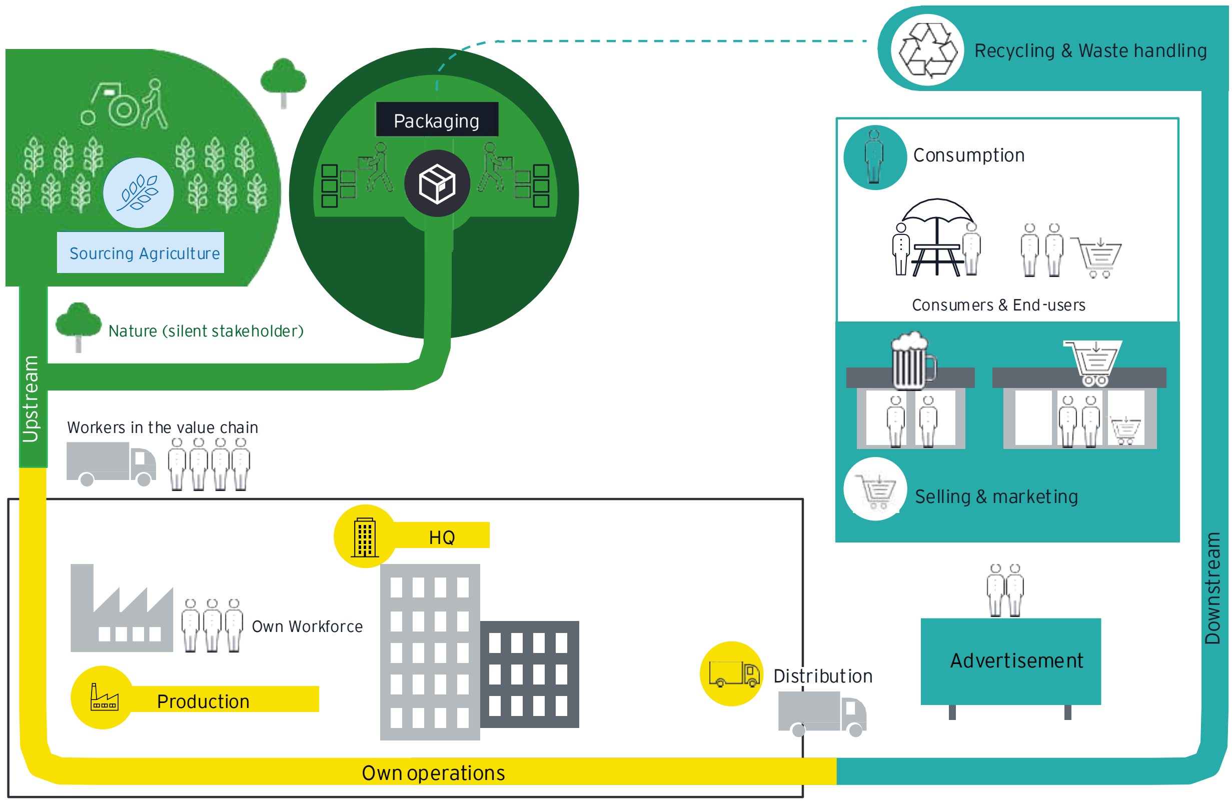
The primary operational activities include brewing, bottling, and administrative functions. These are carried out by the local workforce, whose expertise and commitment are fundamental to maintaining the operational quality. Other key operational inputs include intellectual assets (such as proprietary recipes) and long-standing supplier relationships. As part of the sustainability strategy, the Group is transitioning towards the use of renewable energy and working on optimisation of the production process to reduce water consumption during the brewing process. In addition, the Group places strong emphasis on health and safety, with structured protocols and training designed to ensure a safe and supportive work environment [ESRS-2_SBM-1_42a].

Downstream, the value chain focuses on the distribution and delivery of products to end consumers through various retail and hospitality channels, as well as online platforms. The logistics and sales activities are structured to ensure timely and efficient access to the beverages, enhancing customer satisfaction and loyalty. This efficiency not only drives sales growth but also translates into increased profitability for investors.

In addition, the Group is also involved in community-focused initiatives that promote responsible consumption. These include planned partnerships with local organisations to facilitate workshops and educational events on alcohol awareness. By fostering responsible drinking practices, the Group aims to enhance brand reputation and to strengthen community ties, which can lead to increased customer trust and long-term business sustainability.

For the investors and stakeholders, these efforts represent a commitment to social responsibility that is expected to yield positive outcomes, such as improved market positioning and potential for enhanced shareholder value. By reinforcing the Group's role as a responsible member of the community, it not only contributes to societal well-being but also creates a favourable environment for sustainable business growth, ultimately benefiting all stakeholders involved [ESRS-2_SBM-1_42b,42c].

Good Group ESRS Brewery - value chain [ESRS-2_SBM-1_42, 42a,42b, 42c].



2.3.2 SBM-2 Interest and views of stakeholders

Engagement with stakeholders is a cornerstone of the Group's sustainability strategy. Their input is vital in steering the sustainability direction as well as providing valuable feedback on the various initiatives [ESRS-2_SBM-2_45a(iv), 45a(v)] The Group actively seeks feedback from key stakeholders to understand their concerns and expectations of the sustainability performance as well as overall strategy. Their views are taken into consideration when reevaluating the strategy and business model, as presented in the table below [ESRS-2_SBM-2_45a, 45a(i), 45a(ii), 45a(iii), 45a(iv), 45a(v), 45b].

Stakeholder	Stakeholder interests and views and purpose of engagement	Stakeholder engagement	Impact on strategy and business model
Employees	The Group's employees seek opportunities for growth and personal development as well as a workplace that values diversity and a good	The Group prioritises ongoing dialogue through internal communication platforms as well as through union representatives. It conducts annual employee engagement and work environment	Insights from these engagement efforts are analysed and integrated into talent management strategies to

Stakeholder	Stakeholder interests and views and purpose of engagement	Stakeholder engagement	Impact on strategy and business model
	and safe working environment.	surveys and facilitates quarterly townhall meetings to gather insights and foster a sense of belonging (please refer to section 4.2.2).	improve employee wellbeing (please refer to section 4.1).
Suppliers	Seek clarity on the Group's priorities and long-term objectives to align their strategies with current and future material demands.	The Group fosters strong relationships with suppliers through ongoing commercial discussions, site visits, and annual supplier summits. Additionally, supplier surveys are sent at the start-up phase.	Improved awareness of the challenges and opportunities in the upstream value chain informs the planned assortment and drives ongoing development in response to future supply.
Customers	The Group's customers (e.g., bars, restaurants) are increasingly looking for high-quality products that, in turn, reflect sustainable ambitions and social development of the individual end-customers (i.e., consumers).	The Group engages with customers through satisfaction surveys conducted biannually and through continuous communication through sales activities and commercial discussions.	Insights from customers steer innovation towards more aligned products and practices, also to responsible drinking. ensuring ongoing market relevance.
Consumers	Consumers are interested in product quality, sustainability and ethical sourcing. They value health conscious options that reflect their lifestyle, social concerns and responsible drinking.	The Group gains direct feedback through social media, success of and feedback on marketing campaigns, as well as through ongoing surveys.	Consumer expectations steer the development of high-quality alternatives for beverages to enhance responsible drinking.
Local Communities	Seek to contribute to local economies and social well-being with an emphasis on responsible drinking.	The Group actively engages with local communities through partnerships, and participation in community-driven events held throughout the year to promote responsible drinking.	Engaging with local communities gives the Group operating space and expands the market share.
Shareholders	Shareholders are interested in understanding the Group's financial performance and commitment to sustainable practices. They expect transparency and regular progress updates.	The Group maintains transparency through annual financial reports and management reports including sustainability reports, and through biannual shareholder meetings.	Enables the Group to align its strategic initiatives with shareholder expectations, ensuring longevity in investments and strategic direction.
Policymakers	Seek local economic contribution and support to public health initiatives. They look for alignment with local sustainability goals.	The Group engages with policymakers through participation in industry associations, public forums and direct discussions as needed.	Enhancing its alignment with laws and regulations refines business strategies in response to evolving public health and sustainability agendas.
Sustainability Experts, representing Nature (silent stakeholder)	Seek robust sustainability performance and transparent reporting on environmental and social impact. Focus on having a strong sustainability strategy.	The Group collaborates with sustainability experts, experts in the value chain and NGOs through ongoing partnerships and it participates in initiatives that promote best practices.	Incorporation of stakeholder views enhances the Group's sustainability initiatives and demonstrates commitment to sustainable business practices.

As part of the Group's ongoing commitment to sustainability and in response to stakeholder expectations, the Group has amended its strategy by, for example, expanding its product portfolio to include more sustainable beverage options. In addition, the Group has added non/low-alcohol alternatives (please refer to section 2.3.1.1 for more changes made to the strategy). The Group plans to further develop this line over the next two years. These changes are expected to strengthen stakeholder trust and reinforce its reputation as a responsible and responsive brand [ESRS-2_SBM-2_45c, 45c(i), 45c(ii), 45c(iii)].

The administrative, management and supervisory bodies, including relevant committees, are informed on a quarterly basis about the views and interests of affected stakeholders concerning the Group's sustainability-related impacts. This process includes a review of stakeholder feedback, which is integrated into the identification and assessment of material impacts, risks, and opportunities. The Board and Executive Management Team actively incorporate stakeholder insights when overseeing the Group's strategy, particularly in relation to major transactions and the overall risk management process [ESRS-2_SBM-2_45d].

2.4. Material impacts, risks and opportunities

2.4.1 SBM-3 Material impacts, risks, and opportunities and their interaction with strategy and business model

The Group conducted a double materiality assessment (DMA) to identify the material impacts, risks and opportunities. This has resulted in the material IROs as outlined below. The overview illustrates where these IROs are located in the operations and value chain, connecting them to the overarching strategy and business model. A more detailed explanation of material IROs specific to each topic can be found under the SBM-3 section related to each topical standard (please refer to sections 3.1, 3.3.1, 4.1, 5.1).

[ESRS-2_SBM-3_48a, 48b, 48c(i), 48c(ii), 48c(iii), 48c(iv); E1.SBM-3_18]

IRO Sub-sub-topic	Impacts, risks and opportunities	Category	Value Chain	Time Horizon
ESRS E1 Climate Change				
Climate Change mitigation				
GHG Emissions Scope 1, 2	GHG Emissions in own operations (Scope 1,2): Fossil fuel consumption and energy use contributes to negative environmental impacts (business processes have negative impact on climate when not sourced from renewable sources).	⊖ A	O	S, M, L
GHG Emissions Scope 3	GHG Emissions in value chain (Scope 3): Fossil fuel consumption contributes to negative environmental impacts (business processes have negative impact on climate when not sourced from renewable sources).	⊖ A	U, D	S, M, L
Stringent environmental regulation	Increasingly stringent environmental regulations aimed at reducing carbon emissions and promoting sustainability can result in higher compliance costs and necessitate changes in operational practices.	⚠ **Transition**	O	S, M, L
Expanding product portfolio	Expanding product portfolio by using more sustainable beverage options – low carbon products, upgrading production facilities with energy-efficient technologies.	✅	O	S, M, L
Climate Change Adaptation				
Extreme weather events	Extreme weather events such as floods, droughts, and storms can disrupt production processes, supply chains, and distribution networks, leading to increased operational costs and potential revenue losses.	⚠ **Physical acute**	U, O, D	M, L
Changes in climate patterns	Changes in climate patterns can affect the availability and quality of raw materials, particularly water and agricultural products essential for brewing. This scarcity can drive up costs and impact product quality.	⚠ **Physical chronic**	U	M, L
ESRS S1 Own Workforce				
Working conditions				
Adequate wages	Fair compensation for employees (e.g., wages, benefits, flexible working arrangements) beyond regulatory requirements can support a realistic standard of living for employees and their families and can foster employee satisfaction and a positive work environment.	⊕ P	O	S, M
Freedom of association, collective bargaining and social dialogue	The denial of employees' rights to freedom of association and collective bargaining (e.g., through non-compliance with union election rules) can directly impede their capacity to negotiate equitable salaries, working hours, and improved living and working conditions. Such limitations, coupled with the potential absence of safe channels for employees to voice concerns and engage in social dialogue, can negatively impact the employees by creating unfair working environments and reducing overall job satisfaction.	⊖ P	O	S, M, L

IRO Sub-sub-topic	Impacts, risks and opportunities	Category	Value Chain	Time Horizon
Work-life balance	A lack of work-life balance is likely to lead to a higher risk of occupational accidents, greater health risks, and negative effects on family life.	⊖ A	O	S, M, L
Health and safety	Reduced workplace safety and exposure to hazardous environments hinder talent attraction and efficiency, ultimately impacting business outcomes and financial performance due to increased accidents, injuries, and long-term health issues.	⚠	O	S, M, L
Equal treatment and opportunities for all				
Diversity	Failure to achieve Diversity, Equity and Inclusion ambitions and unlock the full potential of people and the organisation may impact wellbeing and may result in efficiency losses as well as lost business opportunities. In particular, lack of gender equality can be detrimental to workplace culture, resulting in higher employee turnover and difficulties in attracting top talent.	⚠ ⊖ P	O	S, M, L
Training and skills development	Robust training and development opportunities lead to a skills development within the workforce, fostering innovation and efficiency as well as securing long-term employee success and organisational resilience.	☑	O	S, M
Other-work related rights				
Forced and child labour	Forced and child labour can have a significant negative impact on affected communities and the respect of human rights and result in a risk of legal prosecution, fines and reputation damage.	⚠ ⊖ P	O	S, M, L
ESRS G1 Business Conduct				
Business conduct				
Corporate culture	The Group's ethical values—transparency, accountability, and integrity—shape a corporate culture that fosters inclusivity and long-term value. This strengthens employee belonging, enhances stakeholder trust, and supports sustainable business outcomes.	⊕ P	O	S, M, L
Protection of whistle-blowers	If the anonymity of whistleblowers cannot be guaranteed, this failure to protect whistleblowers from retaliation will have a negative impact on the Group. Such failure may cause negative legal, financial, or health effects on the individual, and may dissuade individuals from reporting future issues regarding unethical behaviour, counterfeit or illicit trade, or harassment in the workplace.	⚠ ⊖ P	O	S, M, L
Political engagement and lobbying activities	Unclear practices in terms of **lobbying** or **political** financial **contributions** may lead to public backlash and critique (e.g., giving rise to accusations that the Group is slowing down progress to achieve climate goals; or the Group could be open to accusations of trying to exercise	⚠ ⊖ P	O	S, M, L

IRO Sub-sub-topic	Impacts, risks and opportunities	Category	Value Chain	Time Horizon
	influence in setting the legal drinking age, or creating unfavourable market conditions for other companies), which could damage brand reputation and affect sales.			
Management of relationships with suppliers including payment practices	Failure to develop and maintain processes that prevent unethical engagement with suppliers (e.g., delayed payments, unfair dealings, and preferential treatment) through the Group's policies in the upstream & downstream value chain may affect suppliers' cash flow and result in negative impacts on people, including human and labour rights, as well as on the environment.	⚠ ⊖ P	O	**S, M, L**
Corruption and bribery				
Corruption and bribery	Failure to prevent the use of bribes or other illegal payments, including through third-party intermediaries, for the purpose of obtaining or retaining a business advantage, may distort fair market competition and lead to legal prosecution, fines and reputational damage.	⚠ ⊖ P	O	**S, M, L**

Legend

Category

⊕ **-** Positive impact
⊖ **-** Negative impact

A - Actual
P - Potential

☑ Opportunity

⚠ Risk

Value Chain

U – Upstream
O – Own operations
D - Downstream

Time horizon

S – short-term
M – medium-term
L – long-term

No entity-specific topics have been identified [ESRS-2_SBM-3_48h] and there are no changes to the material impacts, risks and opportunities compared to the previous period [ESRS-2_SBM-3_48g].

Resilience of the Group's strategy and business model

The Group performed a resilience assessment of its strategy and business model. This assessment process involves a comprehensive evaluation of the strategy's and business model's ability to adapt to address material impacts and risks and to take advantage of identified opportunities. The resilience assessment is covered in the sections below regarding the effects of the identified material IRO's on the business model, value chain, strategy and decision making, current financial effects and anticipated financial effects. In addition, the climate change resilience assessment can be found in section 3.3.1.

Effects of identified material IRO's on the Group's business model, value chain, strategy and decision making [ESRS-2_SBM-3_48b, 48f]

As mentioned in section 2.3.1.1, a reciprocal relationship exists between the Group's strategy and business model and the identified IROs. On one hand, the identified material IROs affect the Group's strategic direction and, on the other hand, strategic decisions affect the IROs.

In response to the identified IROs listed above, the Group adapted its business model and strategy to remain resilient and to capitalise on opportunities. The previously implemented sustainability strategy, 'Towards a Greener Horizon,' plays a key role in addressing environmental IROs. The main aspects of this strategy include reducing the environmental carbon footprint and enhancing efficient sourcing. To achieve this, the Group is improving energy efficiency, switching to renewable electricity, engaging actively with suppliers and optimising brewing recipes, among other things. Additionally, the Group is expanding the product portfolio to include more sustainable beverage options (please refer to section 3.5.2 for more information on these actions).

The IROs identified concerning the Group's own workforce underscore the importance of fostering an inclusive, respectful and safe workplace, which in turn, guides strategic decision-making. The identification of these IROs has increased awareness of the importance of considering potential effects on the workforce in relation to the Group's strategy, business model, and decision-making. It has also emphasized the importance of staying connected with the workforce. As a result, the Group now holds quarterly town hall meetings to gather insights and foster a sense of belonging.

In addition, the identification of IROs has resulted in the Group increasing its focus on responsible and ethical business conduct. Specifically, it is actively collaborating with partners across the value chain to identify and mitigate business conduct risks such as corruption and bribery.

Please refer to the different topical sections for more details about the actions resulting from the evolving strategy.

Commentary on the ESRS sustainability disclosures

ESRS-2_SBM-3_49 allows the descriptive information required in ESRS-2_SBM-3_46 about material impacts, risks and opportunities and their interaction with the strategy and business model to be provided alongside the disclosures given under the corresponding topical ESRS. If the undertaking elects this option, it still has to present a statement of material impacts, risks and opportunities alongside its disclosures prepared under ESRS 2.

For the purpose of this illustration, IROs have only been identified for ESRS E1, ESRS S1 and ESRS G1. Entity-specific IROs have not been included.

Current financial effects [ESRS-2_SBM-3_48d]

An analysis was conducted to evaluate whether any of the IROs identified had a material financial effect on the Group's financial position, financial performance and cash flows during the current reporting period. The assessment also took into consideration the likelihood that any IROs would lead to a material adjustment to the reported values of assets and liabilities in the next annual reporting period.

With reference to the Group's risk management strategy, the analysis involved mapping each of the identified IROs to the possible financial impact they could have and evaluating the extent to which any of these impacts had materialised over the current reporting period.

Current financial effects mainly relate to capital and operational expenditures in relation to the Transition Plan for Climate Change (please refer to section 3.4.1 for information about the respective financial effects).

Anticipated financial effects [ESRS-2_SBM-3_48e, 48f]

In addition, an analysis was conducted to evaluate whether any of the material risks and opportunities identified is anticipated to have a material financial effect on the Group's financial position, financial performance and cashflows over the short-, medium- and long-term.

Commentary on ESRS sustainability disclosures

For the Group, the illustration of the anticipated financial effects in the short, medium- and long-term was only provided for climate-related risks (see section 3.7).

A similar approach could apply to other sustainability-related risks and opportunities, but this publication does not provide an exhaustive list of all sustainability-related risks and opportunities defined.

With reference to the Group's risk management strategy, the analysis involved mapping each of the identified IROs to the possible financial impact they could have and evaluating the period of the effect.

In line with the current financial effects, the anticipated financial effects mainly relate to the Transition Plan for Climate Change. As explained in section 3.4.1 the Group has significant assets at physical risk, e.g. the production facilities. This risk is being addressed by various action plans as explained in section 3.5.2. This also puts the revenue streams from these production facilities at material physical risk. Potential financial effects arising from material physical risks could, for example, relate to damages to assets as a result of extreme weather events and resulting disruptions to operations. In addition, the Group anticipates financial effects as a result of capital expenditures and operational expenditures in relation to mitigation actions.

The Group anticipates positive financial effects as a result of increase demand for low-carbon products in the brewing industry. By strategically positioning itself within this market, the Group aims to capture a significant share of this market (please refer to section 3.7 for more details on the anticipated financial effects).

2.4.2 IRO-1 Process to identify and assess material impacts, risk and opportunities

The Group's DMA approach is a comprehensive and systematic one, designed to identify, assess and prioritise the IROs associated with its operations and value chain. The process consists of 10 steps, each aimed to ensure that it identifies the material sustainability topics relevant to the business and stakeholders [ESRS-2_IRO-1_53a, 53b]. In line with the principle of double materiality, sustainability-related topics were considered material if they were material from the perspective of impact materiality or from the perspective of financial materiality, or both.

1. **Preparation and planning**

   The process begins with the formation of a cross-functional team composed of representatives from sustainability, risk management, finance, operations, and stakeholder engagement. This team is responsible for overseeing and guiding the entire DMA. Next, the objectives and scope of the assessment are clearly defined, establishing the purpose of identifying sustainability IROs relevant to the Group.

2. **Understanding the context and mapping the value chain**

   As a starting point in the process to identify and assess material IROs, the Group performed an analysis of its context. As part of this analysis, the Group has evaluated its strategy, activities, products and geographical locations of these activities, affected stakeholders and business relationships. As explained in section 2.2.4, the DMA process is also informed by the Group's process on due diligence.

   To better understand where impacts may arise, the Group's value chain is visualised, including its geographical locations. This was done based upon internal descriptions of the Group's activities, an overview of suppliers and distributors and sectorial analyses (please refer to section 2.3.1.2 for the visualisation of the value chain). From raw material sourcing to end-user distribution, the analysis covered all major geographical regions in which the Group as well as upstream and downstream activities operate [ESRS-2_IRO-1_53b(ii)]. Assumptions included typical supplier regions for key raw materials, energy and water usage patterns at brewing facilities and logistic routes to major markets [ESRS-2_IRO-1_53g]. Activities are categorized into upstream (e.g., sourcing raw materials), operational (brewing and production), and downstream (distribution and sales) segments. The identified sustainability topics are then mapped against these segments to pinpoint where both direct (e.g., emissions during brewing) and indirect (e.g., supply chain water usage) impacts occur and who the affected stakeholders are.

   In identifying risks and opportunities, the Group evaluated whether the identified impacts of the Group on people and the environment could lead to any risks or opportunities for the Group. For instance, this includes potential future regulations addressing these impacts. Additionally, the Group examined dependencies on environmental and human resources to determine if they might result in any risks or opportunities. To achieve this, the value chain was assessed and the inputs used in the process to identify any dependencies on these resources. This evaluation helped to determine whether the Group's impact on these resources could result in any risks or opportunities for the Group [ESRS-2_IRO-1_53c(i)].

Consideration of specificities that could give rise to heightened risk of adverse impacts

The Group is active in both Europe and Asia, serving customers worldwide. A risk assessment was performed to identify potential higher risks for specific geographical areas. Based on this analysis, a higher risk was identified for Asialand as a result of the social and legal environment. As such, the Group considers the activities and business relationships in this region as higher in risk, both for human rights and environmental sustainability matters [ESRS-2_IRO-1_53b(i)].

Consideration of material impacts or risks arising from actions to address sustainability matters

As part of this step, the Group assesses whether the significant action plans to address material impacts, risks and opportunities might lead to material negative impacts or risks in relation to other sustainability matters. Specific attention is, for example, given to how these could impact the Group’s own workforce and whether the actions could lead to potentially stranded assets. At this stage, the Group did not identify any actions giving rise to material negative impacts or risks in relation to other sustainability matters.

3. **Engaging stakeholders**

   Effective stakeholder engagement is a cornerstone of the Group’s DMA process. A stakeholder engagement plan was developed to identify and involve key internal and external parties, specified in previous section 2.3.2. External stakeholder interviews and surveys were conducted, with proxy representatives/external experts for those stakeholders unable to participate, in order to gather insights on the perceived impact, risk and opportunity of the identified sustainability impacts. In addition, workshops are organised to discuss preliminary findings, validate the topics, and collaboratively prioritise them based on shared input [ESRS-2_IRO-1_53b(iii)].

4. **Identification of actual and potential impacts, risks and opportunities**

   In this step, the Group created a list with potential IROs derived from the previous steps and considered additional relevant potential IROs to the Group’s business model and value chain. Next, those potential IROs were linked to the structure provided in *ESRS 1, Appendix A, Application Requirement 16 Sustainability matters to be included in the materiality assessment*.

5. **Assessment of impacts, risks and opportunities related to sustainability matters**

   Once IROs have been identified, the next phase involves assessing their materiality. Criteria are applied to assess both impact materiality and financial materiality over the short-, medium- and long-term, in order to determine the material actual and potential impacts and material risks and opportunities. This assessment is performed without considering mitigating actions.

   Impact materiality assessment

   The materiality assessment for negative impacts is based on likelihood and severity (based on scale, scope and irremediability) of the impact. For positive impacts it is based on scale, scope and likelihood. These criteria are scored from 1 to 5 according to the tables at the bottom of this section. This assessment draws on both internal data, such as operational reports and financial statements, and external sources like academic research and industry analyses.

   Next, the materiality of impacts is assessed using the matrix depicted at the end of this section. Thresholds are used to aid in the establishment of materiality. The scoring determines the prioritisation of future sustainability work [ESRS-2_IRO-1_53b(iv), 53c, 53c(i)]. An impact is scored based on its scale and scope, and irremediability (only for negative impacts). This results in a severity score, which is then multiplied by the likelihood of occurrence. In the event of a potential impact, an item is considered as material if the total score exceeds 12. In the event of potential negative impacts on human rights, severity takes precedence over the likelihood (3:1 weighting, respectively). In the event of actual impacts, likelihood is not applicable, and an impact is considered as material if the score exceeds 3.

   Financial materiality assessment
   The materiality of risks and opportunities is assessed based on the likelihood of and the potential magnitude of the financial effects for the Group. Magnitude considers factors such as hindrance to, or acceleration of, growth and profitability; it is aligned with the Group’s enterprise risk management framework (same time horizons, rating scales and risk universe is applied). In assessing the magnitude of risk or opportunity, the Group considered the qualitative implications of the identified risks and

opportunities on financial effects in the short-, medium- and long-term due to the Group's inability to quantify these. The magnitude scores reflect the Group's insights on the financial effects on its development, financial position, financial performance, etc. Magnitude and likelihood are scored on a scale of 1-5 (please refer to the tables at the bottom of this section). Like the method for determining impact materiality, magnitude of risk or opportunity is multiplied by the likelihood of occurrence. In line with the thresholds applied for impact materiality, a risk or opportunity is considered material if the total score exceeds 12.

The Group assesses risk systematically through the enterprise risk management framework, including sustainability risk. These risks are aligned with the Group's broader risk management framework, ensuring that sustainability considerations are integrated into overall risk prioritisation. The matrix evaluates various dimensions, including financial, operational, reputational, and compliance impacts, allowing sustainability risks to be compared and weighted against other business risks. The risks are prioritised using the matrix as depicted on the bottom of this section [ESRS-2_IRO-1_53c(iii)].

6. **Validation of outcomes**
The prioritised list of material topics undergoes validation through sessions with internal subject matter experts in order to assess and validate the completeness of the list of material IROs [ESRS-2_IRO-1_53b(iii)].

7. **Approval by leadership**
With validation complete, the findings and recommendations are compiled in a comprehensive report, which is first presented to the executive leadership team for review and approval. Following their endorsement, the results are submitted to the Board for final approval [ESRS-2_IRO-1_53d].

8. **Implementation**
Action plans, based on a gap assessment of the "as-is" status and prioritisation, are developed for each material topic. These plans include specific goals, targets and initiatives, alongside measurable metrics to track progress. The identification, assessment and management of sustainability-related impacts, risks and opportunities is integrated into the overall management process through the enterprise risk management framework. Although the enterprise risk management framework mainly focuses on risks, it also takes the Group's impacts on sustainability matters into consideration as these can potentially become risks. Identified opportunities in the DMA are used in the strategic management processes [ESRS-2_IRO-1_53e, 53f].

9. **Ongoing review and adaptation**
Recognising that material issues can evolve over time, a monitoring framework is established to support regular reviews of the assessment process when there are bigger changes to the strategic and operational context. This framework ensures periodic reassessments that reflect changes in stakeholder expectations, regulatory requirements, and industry dynamics. A culture of continuous improvement is fostered by incorporating stakeholder feedback and lessons learned into future assessments. The process of determining materiality was modified in 2025 by incorporating a more detailed subject analysis. This included deeper evaluations of topics such as the climate impact of the local energy mix, supply chain resilience to different climatic pressures as well as local labour practices and norms, making the assessment more comprehensive and reflective of a broader range of relevant issues [ESRS-2_IRO-1_53h].

10. **Reporting and communication**
Finally, the results of the DMA are transparently communicated through the Group's sustainability reports and other disclosures. Stakeholders are actively engaged through various communication channels, including annual reports and community initiatives, reinforcing the Group's commitment to sustainability and accountability.

Detailed considerations on the process to identify and assess material impacts, risks and opportunities, as required by the climate change standard, are included in section 3.2.1.

Description of the process to identify and assess pollution-related material impacts, risk and opportunities

The Group has implemented a structured process to identify and assess pollution-related IROs across its operations and value chain. This included screening all site locations and business activities to identify actual and potential pollution-related IROs. The screening focused on emissions generated during growing the raw materials, brewing processes and transportation, including NOx, particulate matter, and solvent use in cleaning operations, as well as dependencies on surrounding ecosystem services to mitigate potential pollution events. The assessment used the same sources and value chain scope as the DMA process [E2_IRO-1_11a].

As part of the assessment process, the Group did not identify any E2 pollution-related IROs or opportunities currently considered material, as their significant impacts fall under other topical standards. Pollution from raw material production is addressed under E4 Biodiversity and Ecosystems, while packaging waste pollution is covered by E5 Resource Use and Circular Economy. Stakeholder input was sought through direct consultations with external communities, assessing the Group's impact near vulnerable zones [E2_IRO-1_11b].

The pollution-related assessment will be revisited regularly to reflect evolving regulatory expectations and stakeholder concerns.

Description of the process to identify and assess business conduct related impacts, risks and opportunities [G1_IRO-1_6]

The Group applies a structured assessment process to identify material impacts, risks and opportunities related to business conduct, guided by the nature and scope of its operations across two core geographies: Asialand (Asia) and Euroland (Europe). The analysis considers regional sensitivities and stakeholder expectations. Local regulatory frameworks, governance culture, and civil society engagement are key criteria in shaping risk profiles and opportunity mapping in each location. There is a focus on core operational activities including beverage production, sourcing, distribution and retail partnerships. The Group assesses exposure to ethical conduct concerns such as supplier practices, labour conditions and community engagement within each activity stream. Operating in the beverage industry, the Group applies sector-specific benchmarks to evaluate risks of bribery and corruption, fair marketing practices, responsible sourcing and lobbying transparency. The Group also accounts for increasing scrutiny around environmental and social claims in product labelling and corporate communication.

The Group assesses business conduct risks based on transaction types, including direct procurement or third-party distributor arrangements. Particular attention is given to how control is exercised over counterparties and their alignment with the Group's Code of Ethics and Supplier Conduct Principles.

Scoring tables and matrix used in the materiality assessment

Severity/ Magnitude	Likelihood: 1	2	3	4	5
5	5	10	15	20	25
4	4	8	12	16	20
3	3	6	9	12	15
2	2	4	6	8	10
1	1	2	3	4	5

Figure: The matrix used for determining Score	Severity/scale and scope	Description
1	Minimal impact	Minimal scale, with a minimal scope, and/or easily remediated (for negative impacts).
2	Minor impact	Minor scale, with a minor scope, and/or capable of being remediated (for negative impacts).
3	Moderate impact	Moderate scale, with a moderate scope, and/or somewhat difficult to remediate (for negative impacts).
4	High impact	High scale, on a widespread scope, and challenging to remediate (for negative impacts).
5	Critical impact	Critical scale, on a global scope, and/or irremediable (for negative impacts).

Score	Likelihood	Description
1	Highly unlikely	Minimal chance of occurring. Considered almost impossible under current conditions.
2	Unlikely	Small possibility of occurring. May occur under specific circumstances but, generally, regarded as rare.
3	Possible	Moderate chance of occurring. While it is not guaranteed, it is plausible and could happen depending on current trends and conditions.
4	Likely	Expected to occur with a good degree of certainty. Strong possibility that it will occur based on current trends or conditions.
5	Highly likely	Almost certain to occur. High probability that it will happen, supported by substantial evidence or trends.

Score	Magnitude	Description
1	Minimal financial effect	Negligible potential effect. Not noticeable.
2	Minor financial effect	Minor potential effect. While noticeable, it does not significantly affect the Group's development, financial position, financial performance, cash flows, access to finance or cost of capital.
3	Moderate financial effect	Moderate potential effect. In case of negative potential effects this may require management to mitigate potential risks.
4	Significant financial effect	Significant potential effect. In case of negative potential effects this could have serious implications on the Group's development, financial position, financial performance, cash flows, access to finance or cost of capital.
5	Critical financial effect	Severe potential effect. In case of negative potential effects, this could pose a major threat to the Group's development, financial position, financial performance, cash flows, access to finance or cost of capital.

EY Commentary on the ESRS sustainability disclosures

Note that ESRS do not specify how the materiality assessment process and calculation should be designed or carried out by the undertaking; the process illustrated above is merely an example.

Additionally, it is mandatory to give an IRO-1 description for all environmental topics and the governance topic, regardless of whether they are deemed material or non-material. This illustrative sustainability statement focuses solely on disclosures related to E1, S1, and G1. Consequently, the IRO-1 descriptions for the remaining topics are not included. However, the IRO-1 description for E2 Pollution is included to provide an example of how a non-material topic can be illustrated.

2.5. Disclosure requirements index

2.5.1 IRO-2 List of disclosure requirements complied with and datapoints that derive from other EU legislation

Following the completion of the double materiality assessment, the Group has mapped material IROs to the disclosure requirements and data points within the ESRS in Appendix A of the Group's management report [ESRS-2_IRO-2_56].

To assess the materiality of information to be disclosed, a qualitative assessment was performed, rather than applying quantitative thresholds. This assessment focused on evaluating whether the information is relevant based on its significance to the matter it represents or its ability to meet the decision-making needs of users [ESRS-2_IRO-2_59].

If a specific requirement was not found to align with a material IRO, the related data point or disclosure requirement has not been disclosed [ESRS-2_IRO-2_56].

EY Commentary on the ESRS sustainability disclosures

ESRS-2_IRO-2_57 states that if the undertaking concludes that climate change is not material and, therefore, omits all disclosure requirements in *ESRS E1 Climate change*, it must disclose a detailed explanation of the conclusions of its materiality assessment with regard to climate change, including a forward-looking analysis of the conditions that could lead the undertaking to conclude that climate change is material in the future.

In this illustrative sustainability statement, climate change is material. As such, the above mentioned disclosure is not applicable and, therefore, not illustrated.

Additionally, the ESRS stipulate that the undertaking must include a table of all the datapoints that derive from other EU legislation as listed in Appendix B of ESRS 2, indicating where they can be found in the sustainability statement. The datapoints must include those that the undertaking has assessed as not material, in which case the undertaking must state "Not material" in the table in accordance with ESRS-1-35. In this illustrative sustainability statement, the datapoints deriving from other EU legislation, which pertain to the following standards are not included in the table in Appendix A: *ESRS E2 Pollution*, *ESRS E3 Water and marine resources*, ESRS E4, *ESRS E5 Circular economy*, ESRS S2, ESRS S3, ESRS S4.

3. Environmental information – Climate change

3.1. E1 ESRS 2 SBM-3 Material impacts, risks, and opportunities and their interaction with strategy and business model

The Group's primary markets span Europe and Asia. The Group's climate change-related risks stem largely from regional climate regulations and long-term physical hazards, particularly in areas like Asialand, which is increasingly vulnerable to climate change. With a key factory and major suppliers located in Asia, the resilience of the Group's product portfolio and supply continuity hinges on the ability to implement effective technical solutions.

The Group's sustainability strategy, "Towards a Greener Horizon", addresses these challenges by focusing on reducing the environmental carbon footprint and increasing efficient sourcing. This strategic approach reflects not only the commitment to managing physical and transitional risks, but also to mitigating the broader climate impacts, particularly those linked to GHG emissions. By targeting both risk and impact reduction, the Group is actively pursuing opportunities that support long-term sustainability.

Climate-related risks are integrated in the Group's enterprise risk management framework, reviewed annually by the Sustainability and Audit & Risk Committees, and they inform both the strategic planning and capital allocation processes. The Group has described how climate-related considerations are factored into the remuneration of members of the administrative, management and supervisory bodies in section 2.2.3.

The table below shows the IROs identified for *E1 Climate change* [E1_SBM-3_18] and a summary of the related policies, actions, metrics and targets as further described in this chapter. The detailed information on the IROs, including their time horizons, location in the value chain as well as the general process by which material IROs were identified, is comprehensively documented within sections 2.4.1 and 2.4.2. Detailed considerations for the process to identify and assess material impacts, risks and opportunities, as required by the climate change standard, are included in section 3.2.1. The description of the resilience of the Group's strategy and business model in relation to climate change is in sections 2.4.1and 3.5.2.

Impacts, risks and opportunities	Category	Policy	Actions	Metrics	Target
GHG Emissions in own operations (scope 1,2): Fossil fuel consumption and energy use contribute to negative environmental impacts (business processes have a negative impact on climate when not sourced from renewable sources).	⊖ A	Environmental Policy Renewable Electricity Policy	▪ Electrification of fleet ▪ Energy efficiency improvements ▪ Refrigeration upgrades ▪ Renewable energy transition ▪ Product reformulation	E1-6 Scope 1 GHG Emissions E1-6 Scope 2 GHG Emissions	XXX % absolute reduction in Scope 1 and 2 GHG emissions by 2030 Net-Zero emissions across all scopes in 2050
GHG Emissions in value chain (scope 3): Fossil fuel consumption contributes to negative environmental impacts (business processes have a negative impact on climate when not sourced from renewable sources).	⊖ A	Environmental policy	▪ Nature-based solutions ▪ Supplier engagement ▪ Product reformulation ▪ Sustainable logistics ▪ Circular packaging	E1-6 Scope 3 GHG Emissions	XXX % absolute reduction in Scope 3 GHG emissions by 2030 Net-Zero emissions across all scopes in 2050
Increasingly stringent environmental regulations aimed at reducing carbon emissions and promoting sustainability can result in higher compliance costs and necessitate changes in operational practices.	⚠ **Transition**	Environmental Policy Renewable Electricity Policy	▪ Actions as described above for the Scope 1, 2 and 3 GHG Emissions ▪ Compliance programs ▪ Engagement with policymakers and industry groups	E1-9 Anticipated financial effects E1-6 Scope 1 GHG Emissions E1-6 Scope 2 GHG Emissions	N/A[4]
Expanding product portfolio by using more sustainable beverage options – low carbon products, upgrading production facilities with energy-efficient technologies	✅	Environmental Policy, Renewable Electricity Policy	▪ Electrification of fleet for the transportation of products ▪ Complete abandonment of the use of fertilizers containing nitrates and phosphates in agricultural cultivation	E1-9 Anticipated financial effects	N/A[4]
Extreme weather events such as floods, droughts, and storms can disrupt the production processes, supply chains and distribution networks, leading to increased	⚠ **Physical acute**	Environmental Policy, Renewable Electricity Policy	▪ Investments in climate-resilient infrastructure ▪ Supply chain diversification ▪ Emergency response plans	E1-9 Anticipated financial effects	N/A[4]

[4] Currently, the Group has not established specific targets for these climate change related risks and opportunities. Please refer to section 3.5.3 for an explanation of the related reasons.

Impacts, risks and opportunities	Category	Policy	Actions	Metrics	Target
operational costs and potential revenue losses.					
Changes in climate patterns can affect the availability and quality of raw materials, particularly water and agricultural products essential for brewing. This scarcity can drive up costs and impact product quality.	⚠ **Physical chronic**	Environmental Policy	▪ Engaging suppliers in regenerative agriculture practices ▪ Promoting sustainable farming methods that improve soil health and reduce upstream emissions ▪ Water efficiency upgrades, and sourcing diversification	E1-9 Anticipated financial effects	N/A[4]

Legend

Category

⊕ - Positive impact
⊖ - Negative impact

A - Actual
P - Potential

✅ Opportunity

⚠ Risk

3.2. E1 ESRS 2 IRO-1 Process to identify and assess material climate-related impacts, risks and opportunities

3.2.1 Climate impact, risk and opportunity assessment methodology

The Group has implemented procedures to identify and assess climate-related impacts, risks and opportunities, which are described below. Please refer to section 2.4.2 for the general explanation of the Group's identification process.

Climate-related impact assessment [E1_IRO-1_20 a; E1_IRO-1_AR_9]

As a starting point, the Group identified and assessed the type of climate change impacts in its own operations and in the value chain. GHG emissions were identified as the main impact. As a next step, the Group assessed the Scope 1, 2 and 3 GHG emission sources to identify the location of impacts on climate change across own operations and value chain. This information is further disaggregated into the different geographical locations of the respective GHG emissions. In addition, analyses of potential future emissions are carried out on a project-by-project basis (please refer to section 3.5.2 for the Gross Scopes 1, 2, 3 and total GHG emissions).

Climate-related risk and opportunity assessment and scenario analysis [E1_IRO-1_21]

The Group has implemented a framework to identify and assess climate-related risks and opportunities which has been developed in accordance with the ESRS. In line with the methodology of the TCFD[5] [E1_IRO-1_AR_14], the Group has identified two primary types of climate-related risks:

1. **Physical Risks:** these include acute risks (e.g., floods, heatwaves, storms) and chronic risks (e.g., rising temperatures, water stress) that may disrupt operations, damage assets, or impact supply chain continuity, particularly in Asia, where key suppliers and production facilities are located.
2. **Transition Risks:** these arise from the shift to a low-carbon economy and include regulatory changes (e.g., carbon pricing), evolving consumer preferences, and technological shifts that may affect the cost structure and competitiveness, especially in European markets.

These risks are mapped to own operations (e.g., breweries in Euroland and Asia) and to the value chain – upstream (e.g., agricultural inputs) and downstream (e.g., distribution and retail). In addition, the Group made an assessment based on the location of operations [E1_IRO-1_AR 11 a].

In terms of opportunities, the Group's approach evaluates potential innovations in products and optimisation of production facilities that align with its sustainability goals and it explores new market segments, for example, driven by demand for low-carbon products in the brewing industry. In addition, regular stakeholder engagement and market analysis are conducted in order to identify emerging opportunities.

Scenario analysis

The Group uses scenario analysis for its assessment. The scenarios are based on Shared Socio-economic Pathways (SSPs). In some cases, where relevant, the Group used more specific data on geographical locations (Coupled Model Intercomparison Project Phase 6 (CMIP6))[6].

The Group used scenario analysis for acute and chronic physical risks for assets in Europe and Asia; the analysis is based on the following three scenarios [E1_IRO-1_AR 13 a].

- SSP1-1.9 (a 1.5°C scenario according to the IEA Net-Zero Paris Agreement)
- SSP1-2.6 (a 2°C scenario approximately equal to Representative Concentration Pathways Database (RCP 2.6)
- SSP5-8.5 (a high emission scenario like RCP 8.5)

For the scenario analysis, the ABC Tool was used which is a comprehensive tool produced by ABC for assessing the physical and transitional risks for companies with a dispersed structure. Climate modelling relies on a prospective scenario-based approach. Indicators (such as number of days with a wet bulb global temperature above 30°C; maximum temperature, annual maximum of the daily maximum temperature or water stress-ratio of total water withdrawals to available renewable surface and groundwater supplies) are, thus, derived within

[5] TCFD Technical Supplement, "The Use of Scenario Analysis in Disclosure of Climate- Related Risks and Opportunities" (2017) and TCFD "Guidance on Scenario Analysis for Non-Financial Companies" (2020)
[6] Coupled Model Intercomparison Project Phase 6 (CMIP6) as included in the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report.

the ABC Tool following different climate scenarios. Climate models operate by solving a broad spectrum of physical equations with the final amount of GHG emissions that constrained the scenario selected. It uses Global Climate Models (GCM) and Regional Climate Models.

The Group considered the following time horizons: short-term (covering the current reporting year and the next year), medium-term (from the end of the short-term period to five years), and long-term (more than five years). Applying these horizons did not lead to any changes in the results of the assessment.

Currently the Group is exposed to additional risk factors resulting from the dynamic macroeconomic and financial environment that impacts, for example, inflation and consumer and investor confidence. This uncertain economic environment may lead governments to seek new revenue streams by raising taxes, including excise duties. These additional risk factors are not reflected in the scenarios mentioned above and they may also affect the Group in several ways, such as expenses related to raw and packaging materials and through an impact on the Group's financial position and response to the identified climate risks [E1_IRO-1_AR_13a, 13b, 13c, 13d].

In preparing the financial statements, the Group applies the same assumptions to climate as in the sustainability statement. Note that in the current period, climate did not have a significant impact on the financial position or financial performance [E1_IRO-1_AR_15].

Climate-related risks are integrated into the Group's enterprise risk management framework, reviewed annually by the Sustainability and Audit & Risk Committees, and inform both the strategic planning and capital allocation processes. [E1_IRO-1_11 b].

3.2.2 Physical risk assessment – methodology

[E1_IRO-1_AR_13a, 13b, 13c, 13d]

For physical risks, the ABC Tool (please refer to section 3.2.1) was used to identify relevant climate-related hazards over the short-, medium- and long-term for the different climate scenarios, including a high emission climate scenario, as described in section 3.2.1 [E1_IRO-1_20b (i), 21; E1_IRO-1_AR 11 d]. Climate-related hazards considered relate both to chronic physical risks, such as changing temperature and sea level rise, and acute physical risks, such as cyclones and droughts.

Based on information about climate-related hazards for different climate scenarios, the Group analysed how its assets and activities may be exposed to these identified climate-related hazards, considering the location of the different assets of the Group. In this assessment, the Group considers various asset-specific attributes, such as the type of brewing equipment, storage conditions and facility layout, alongside hazard indicators like the type of climate event, its severity and duration. This information is essential for gaining insight into the exposure of its assets and activities [E1_IRO-1_20 b(ii); E1_IRO-1_AR_11 a]. This approach assesses the exposure of the Group's assets and activities for physical risks and considers the likelihood of a risk occurring, its magnitude, and duration as well as the geospatial coordinates (such as Nomenclature of Territorial Units of Statistics-NUTS for the EU territory) for both own operations and the value chain [E1_IRO-1_AR 11 c].

The Group's assessment considers the short-, medium- and long-term horizon which are aligned with the ESRS-defined time horizons: short-term (2026), medium-term (2027-2031), and long-term (post-2031). These horizons align with the Group's strategic planning and capital allocation cycles with a detailed budget for the first year, budgets for years 2-5, and projections thereafter. Key assets, including production facility buildings and machinery, have useful lives of 15-30 years and 10-12 years, respectively, and are, thus, considered across all time horizons in the assessment [E1_IRO-1_AR 11 b].

In conjunction with the assessment of climate risk categories, the Group's tool has evaluated the climate vulnerability of its brewery assets. The Group has calculated the annual expected losses for each climate hazard by integrating damage functions derived from inputs related to its operational exposure, along with other factors such as asset characteristics and hazard-specific parameters.

Each climate hazard is linked to one or more climate-related indicators.

For the vulnerability assessment, the Group considers various asset-specific attributes, such as the type of brewing equipment, storage conditions and facility layout, alongside hazard indicators like the type of climate event, its severity and duration. This information is essential for quantifying potential damage and determining the financial replacement value of facilities, including both the physical structures and their contents.

While the Group's analysis remains an estimation and does not fully quantify the financial impact, it suggests only minor deviations in asset values compared to projections based on historical climate data and future climate scenarios. Nevertheless, the Group considers that climate change physical risks are qualitatively material due to their distinctive nature.

For more information about the vulnerability assessment, please refer to section 3.3.1.

3.2.3 Transition risk assessment methodology

The transition risk assessment focused on identifying transition risks and opportunities related to the shift to a low-carbon economy. The Group evaluated potential transition events for the short-, medium- and long-term for the 1.5°C scenario as included in the scenario analysis (please refer to section 3.2.1 for more information) [E1_IRO-1_21; E1_IRO-1_AR_12c]. Aspects included are evolving climate-related regulations including taxation, changing consumer preferences and increased operational and capital costs associated with adopting new technologies. Next, the Group assessed the exposure of its assets and activities towards these transition events. Related risks and opportunities may, for example, relate to the availability and cost of key inputs including raw materials, changes in the product portfolio and changes in customer behavior in core markets [E1_IRO-1_20c(i), 20c(ii); E1_IRO-1_AR_12a]. The exposure assessment considers the likelihood of a risk occurring, its magnitude and duration [E1_IRO-1_AR_12b].

Following the assessment, the Group did not identify assets or activities that are incompatible with or need significant efforts to be compatible with a transition to a climate-neutral economy [E1_IRO-1_AR_12d].

3.3. Resilience analysis

3.3.1 E1 ESRS2 SBM-3 Resilience analysis

The climate risk analysis was used as a foundation for the resilience analysis of the business model and operations - including the geographical areas where the Group operates, and the specific climate indicators and circumstances associated with own operations and value chain. Over different time horizons, the Group considered its resilience to different identified IROs by evaluating the effects of the mitigation actions and resources (please refer to section 3.5.2) [E1_SBM-3_AR_7c, 8a].

Also, the resilience assessment considered the anticipated financial effects of the different identified material IROs on a qualitative basis. Please refer to section 3.7 for an overview of the anticipated financial effects, which encompasses the anticipated financial effects as described below [E1_SBM-3_AR_7c].

The resilience analysis covers the Group's core operations in Euroland (Europe) and Asialand (Asia), which are central to the brewing and packaging activities. It also includes key upstream suppliers of barley, hops, and water, and downstream logistics partners [E1_SBM-3_19a]. Non-core suppliers and minor distribution partners were excluded due to immateriality or data limitations [E1_SBM-3_AR_6].

The table below presents the output of this resilience assessment. Each row corresponds to a specific IRO that has been assessed as material to the Group operations, value chain, and/or strategic outlook [E1_SBM-3_AR_7c, 7b, 8a; E1_SBM-3_19c].

Description of IRO	Time Horizon	Mitigation and Adaptation Actions and Resources[1]	Anticipated Financial Effects	Results of Resilience Analysis	Areas of Uncertainty
GHG Emissions in own operations (scope 1,2): Fossil fuel consumption and energy use contribute to negative environmental impacts (business processes have negative impact on climate when not sourced from renewable sources).	Short-, medium- and long-term	Decarbonisation levers as described in the Transition Plan in section 3.4.1.	Potential risk of increased operational costs due to carbon pricing, regulatory compliance transition actions and evolving regulations. Potential for stranded assets.	The mitigation actions have a current and future impact on capital expenditures and operational expenditures, but they are expected to mitigate the related risks. XX% of at-risk assets are covered by mitigation measures. No material assets at risk of being stranded.	Evolving regulations and technological advancements.
GHG Emissions in value chain (Scope 3): Fossil fuel consumption contributes to negative environmental impacts (business processes have negative impact on climate when not sourced from renewable sources).	Short-, medium- and long-term	Decarbonisation levers as described in the Transition Plan in section 3.4.1.	Potential risk of increased operational costs due to regulatory compliance transition actions and evolving regulations. Increased costs due to supply chain disruptions and carbon pricing. Impact on product competitiveness.	Scope 3 is the highest GHG emissions reduction in the decarbonisation roadmap. Resilience analysis shows that mitigating the potential risk will be challenging given the dependency on partners in the value chain.	Uncertainty in supplier compliance and market dynamics.
Increasingly stringent environmental regulations aimed at reducing carbon emissions and promoting sustainability can result in higher compliance costs and necessitate changes in operational practices.	Short-, medium- and long-term	Decarbonisation levers as described in the Transition Plan in section 3.4.1. Compliance programs Engagement with policymakers and industry groups.	Potential risk of increased operational costs, fines, and penalties. Impact on financial performance and competitiveness.	Proactive compliance measures can mitigate financial impacts.	Evolving regulatory landscape, variability in carbon pricing, and technological advancements.
Expanding product portfolio by using more sustainable beverage options – low carbon products, upgrading production facilities with energy-efficient technologies	Short-, medium- and long-term	The use of electric-powered vehicles for the transportation of products, completely abandoning the use of fertilizers containing nitrates and phosphates in agricultural cultivation.	Potential for increased revenues.	There is potential to benefit from this opportunity given the current actions taken regarding own operations and value chain.	Market demand for more sustainable beverage options.
Extreme weather events such as floods, droughts, and storms can disrupt production processes, supply chains, and distribution networks, leading to increased operational costs and potential revenue losses	Medium- and long-term	Investments in climate-resilient infrastructure, supply chain diversification, and emergency response plans.	Potential risk of increased operational costs, supply chain disruptions, and potential revenue losses.	Physical risks are more acute in Asia. XX% of at-risk assets are covered by adaptation measures.	Variability in climate patterns and the frequency of extreme weather events.

Description of IRO	Time Horizon	Mitigation and Adaptation Actions and Resources[1]	Anticipated Financial Effects	Results of Resilience Analysis	Areas of Uncertainty
				The adaptation measures already implemented and expected to be taken in the future are expected to mitigate the risks, but the results will be regularly monitored and reviewed in line with the Risk Management procedure.	
Changes in climate patterns can affect the availability and quality of raw materials, particularly water and agricultural products essential for brewing. This scarcity can drive up costs and impact product quality.	Medium- and long-term	Engaging suppliers in regenerative agriculture practices, promoting sustainable farming methods that improve soil health and reduce upstream emissions, water efficiency upgrades, and sourcing diversification.	Potential risk of increased costs for raw materials, potential impact on product quality, and supply chain disruptions.	The adaptation measures already implemented and expected to be taken in the future are expected to mitigate the risks, but the results will be regularly monitored and reviewed in line with the Risk Management procedure.	Uncertainty in climate projections, regulatory developments, and technological advancements.

Results of resilience analysis

As shown in the table above, the results indicate that while the Group faces significant risks from climate change, there is also an opportunity related to the expansion of the product portfolio.

The analysis showed that for physical risks, which are most acute in Asia, XX % of at-risk assets are already covered by adaptation measures as such enhancing resilience (please refer for to section 3.7). Regarding transition risks, the assessment confirmed that reducing the Scope 3 GHG emissions targets will be challenging given the dependency on partners in the value chain; this requires the Group's attention and is a key element of the decarbonisation strategy [E1_SBM-3_19c].

To further strengthen resilience over the next five years, the Group has identified a number of key actions which are described in section 3.5.2 [E1_SBM-3_AR_8b]. These actions are aligned with the Group's capital expenditure strategy and are expected to reduce exposure to both physical and transition risks while supporting long-term operational continuity. The results from the Group's resilience analysis inform the Group's enterprise risk management framework, investment decisions and mitigation planning. Assets and business activities identified as being at material physical risk are prioritised for adaptation of investments. Transition risks are addressed through the Climate Transition Plan (please refer to section 3.4.1).

Please note that the resilience analysis conducted by the Group is subject to several areas of uncertainty, which are inherent in climate scenario modelling and long-term forecasting, as detailed in the table. More specifically, potential uncertainties relate to, for example, variability in Climate Patterns. The frequency and severity of acute and chronic physical risks may deviate from modelled projections. Also, there is uncertainty around regulatory and policy evolution as the pace and scope of climate-related regulations remain uncertain. In addition, there is inherent uncertainty about technological advancements. The availability and cost of low-carbon technologies may evolve unpredictably. Finally, there is uncertainty around market and consumer behaviour. Shifts in consumer preferences and investor expectations may accelerate or delay transition dynamics.

EY Commentary on the ESRS sustainability disclosures

In line with E1_SBM-3_AR_6, when disclosing the information on the scope of the resilience analysis as required under E1_SBM-3_19a, the undertaking must explain which part of its own operations and upstream and downstream value chain, as well as any material physical risks and transition risks, have been excluded from the analysis.

Methodology

The Group's climate risk analysis and resilience analysis were conducted in 2025 using IPCC climate scenarios: SSP1-1.9, SSP1-2.6, SSP5-8.5 which involved assessing various climate scenarios to understand their potential impacts on the business. This analysis included critical assumptions about macroeconomic trends, energy consumption and technology deployment.

The resilience analysis applied a structured time horizon framework to assess climate-related risks and opportunities. In the short-term, the period from 2026 was considered, focusing on immediate operational and regulatory developments. The medium-term outlook spanned from 2027 to 2031, capturing transitional dynamics such as evolving market conditions and policy shifts.

For the long-term, the analysis extended post-2031, allowing for the evaluation of more profound systemic changes and long-range climate impacts [E1_SBM-3_AR_7b].

Key assumptions included [E1_SBM-3_19b; E1_SBM-3_AR_7a]:

- Macroeconomic Trends: the Group assumed a gradual transition to a lower-carbon economy, with moderate economic growth and stable market conditions based on the constancy and stable revenue growth and decarbonisation activities described in the Transition Plan (please refer to section 3.4.1).
- Energy Consumption and Mix: the Group assumed an increase in the use of renewable energy sources and a decrease in reliance on fossil fuels.
- Technology Deployment: the Group assumed the adoption of advanced technologies for energy efficiency and sustainable practices.
- Targets based on GHG emissions analysis: the targets are validated by SBTi Net-Zero Standard and based on a 1.5°C cross-sectoral decarbonisation pathway, consistent with the IEA Net Zero Emissions by 2050 Scenario which considers regulatory, technological and market developments. The Standard assumes continued decarbonisation of energy systems, supplier engagement, product innovation, and access to certified carbon removals for residual emissions. For Scope 2 GHG emissions, market-based emissions are taken as a reference [MDR-T_80f, 80g; E1-4_34e].

3.4. Transition Plan

3.4.1 E1-1 Transition Plan for climate change mitigation

Strategic Alignment with climate goals

The Group's climate Transition Plan (CTP) is designed to align the business model with a 1.5°C pathway, consistent with the Paris Agreement and the EU's climate neutrality objective by 2050 [E1-1_AR_1]. The Transition Plan is anchored in the sustainability strategy, "*Towards a greener horizon*", which sets clear ambitions and accountabilities across all functions [E1-1_14]. It outlines the steps to be taken to decarbonise the value chain, manage climate-related risks and future-proof the Group's operations. The plan is fully integrated in the overall business strategy and financial planning processes. This includes incorporating climate-related targets (please refer to section 3.5.3 for targets set) and measures into capital allocation decisions, operational budgeting, and risk management. It is reviewed on an annual basis to ensure responsiveness to regulatory, scientific and market developments. All disclosure elements required by the ESRS are included in this sustainability statement, while a more detailed version of the plan is publicly available on the Group's corporate website as supplementary information [E1-1_16h].

Compatibility with a 1.5°C pathway

The Group's science-based climate targets are designed to ensure compatibility with limiting global warming to 1.5°C with no or limited overshoot [E1-1_16a]. They cover Scope 1 and 2 GHG emissions and material categories of Scope 3 GHG emissions.

Based on the Group's emissions baseline year of 2020, the reduction pathway is modelled to deliver an absolute reduction of XX MtCO_2e across Scope 1 and 2 GHG emissions by 2030 and a XX MtCO_2e reduction in material categories of Scope 3 GHG emissions by 2030, which aligns with 1.5°C scenarios. Quantification of this alignment is supported through internal modelling and external frameworks used in target development. The Group is not excluded from EU Paris-aligned Benchmarks [E1-1_16g].

The Group's decarbonisation trajectory prioritises near-term action and avoids reliance on offsets or carbon removal in the short-and medium-term. The emissions reduction required to meet set targets have been modelled using scenario analysis and macroeconomic assumptions aligned with a Paris-consistent trajectory.

For more information on the targets and planned actions to meet them, please refer to section 3.5.2 and 3.5.3 [E1-1_16a,16b].

Key Decarbonisation levers and actions

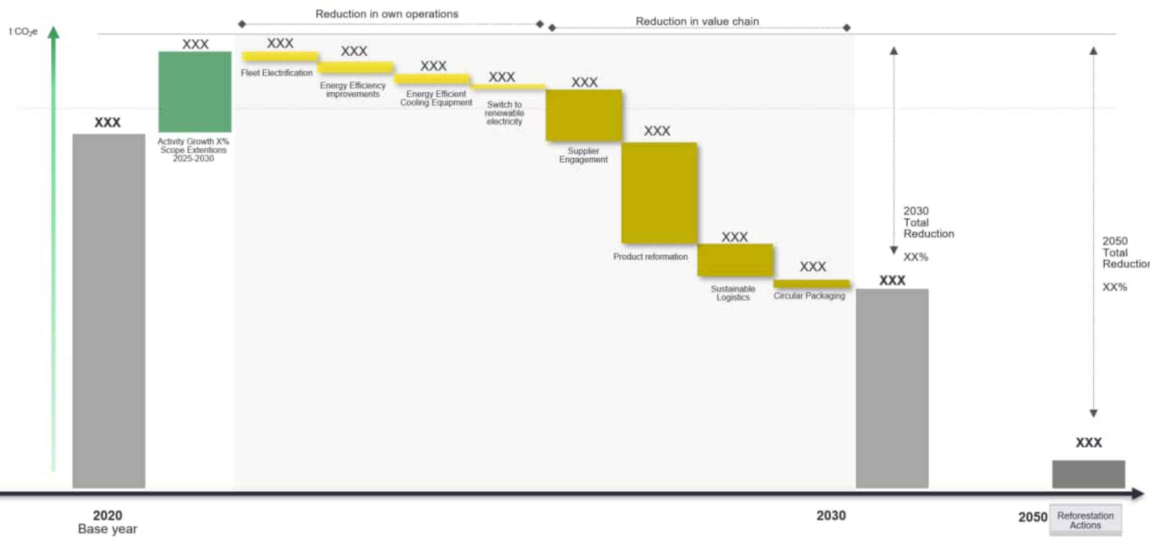
To achieve the GHG emissions reduction targets, the Group has prioritised key decarbonisation levers based on their mitigation potential, feasibility and materiality [E1-1_16b]. These levers and associated actions are detailed in section 3.5.2.

Decarbonisation Lever	Scope
Electrification of fleet	Scope 1
Energy efficiency improvements	Scope 1, 2
Refrigeration upgrades	Scope 1
Renewable energy transition	Scope 2
Supplier engagement	Scope 3.1
Product reformulation	Scope 1, Scope 3.1, 3.11
Sustainable logistics	Scope 3.4, 3.9
Circular packaging	Scope 3.12

To achieve the Net-Zero target, the Group is scaling these measures and complementing them with investments in certified nature-based solutions such as reforestation. As mentioned in section 3.6.3, the Group is not currently engaged in GHG removal or storage activities, nor has it financed any GHG emissions reduction through the purchase of carbon credits to date. However, the Group has set science-based climate targets to reduce GHG emissions across all scopes and become Net-Zero in 2050, which means that the remaining GHG emissions (<10%) will be neutralised through high-quality, certified carbon removals. The specific removal methods and the timeline for implementation are currently under evaluation.

For more details on the Group's climate actions, please refer to section 3.5.2.

The Expected GHG emissions reduction, demonstrated in the Group's decarbonisation roadmap, is shown in the figure below [E1-1_AR_31]. The main reduction needs to be achieved in Scope 3 GHG emissions. The Group aims to do this by active supplier engagement. The Group's focus is on transitioning to renewable energy sources, adopting low-carbon technologies, implementing circular packaging solutions and promoting sustainable agricultural practices. However, decarbonising Scope 3 GHG emissions presents a complex challenge which continuously requires the Group's attention and is a key element of the decarbonisation strategy. Please refer to section 3.5.2 for more information about the Group's actions and to section 3.5.3 for targets set.



Capital and operational expenditures

Implementation of the Transition Plan requires targeted investments in low-carbon technologies and operational improvements. In 2025 €XXX million (2024: € XXX million) in capital expenditures (CapEx) was allocated to energy and process optimisation across three major facilities, with an additional €XXX million (2024: €XXX million) related to operational expenditures (OpEx) [E1-1_16c]. These amounts are part of the line items X and Y in note X and Y in the financial statements [E1-3_29c].

Please refer to section 3.7.2 on anticipated financial effects for information on the expected expenditures for the future to implement the Transition Plan [E1-1_16c, 16h].

Locked-in GHG emissions

As part of its Transition Planning, the Group assessed the potential locked-in GHG emissions associated with its key assets and products. These refer to expected future GHG emissions that may be generated over the lifetime use of assets or products already in use or planned to be in use. While the Group does not currently own large-scale emission-intensive assets or has significant locked-in emissions regarding its products, the Group continuously monitors upcoming capital projects to minimise future locked-in emissions. This includes regular assessments during capital planning cycles and integration of climate criteria into procurement and asset management [E1-1_16d].

Exposure to fossil fuel assets

The Group has no exposure to coal, oil, or natural gas assets related to its production processes and made no CapEx investments in fossil fuel-related activities during the reporting period. The Group, therefore, does not anticipate material transition risks associated with fossil-based assets. As stated in section 3.6.1, the district gas and steam are used for heating during mashing, boiling and sanitation processes [E1-1_AR_1; E1-1_16f].

Governance and oversight

The Climate Transition Plan is formally approved by the Board and overseen by the Sustainability Committee. Implementation is coordinated by the Chief Sustainability Officer, who monitors performance indicators and provides quarterly updates to the Board [E1-1_16i].

Responsibilities are clearly assigned across sustainability, operations, procurement and finance functions, with KPIs designed to track the progress and tied to leadership performance reviews. Progress on implementation is tracked based on emissions reductions, supplier engagement levels and the rollout of key initiatives [E1-1_16j].

Status of the Climate Transition Plan (CTP)

The CTP was adopted in 202X as part of the Group's strategic ESG roadmap. This is the second year in which the Group are reporting in respect of this structured plan under the ESRS [E1-1_17]. While no changes have been made since its initial approval, a full review will take place in 202X to align with updated regulatory and scientific developments.

While there is still much work to be done to meet the set targets, the Group has made progress in its implementation, as is shown from its GHG emissions as reported in section 3.6.2. As previously noted, decarbonising Scope 3 GHG emissions remains a complex and ongoing challenge which requires continuous attention. Moving forward, the Group will continue implementing the decarbonisation levers described in this section and will monitor its progress [E1-1_16j].

3.5. Policies, actions and targets

3.5.1 E1-2 Policies related to climate change mitigation and adaptation

Environmental Policy

Background	Key content [MDR-P_65a]	Scope / Key stakeholders [MDR-P_65b]	Accountability [MDR-P_65c]
▪ The Group has established an Environmental Policy to support its goal of Net-Zero emissions across all scopes in 2050 and to address climate change mitigation and adaptation. ▪ The Policy outlines the overall approach to the environmental topics such as energy efficiency, water and wastewater management, packaging and sourcing of the raw materials [E1-2_25]	▪ The Environmental Policy outlines the strategic approach to key sustainability areas, including energy use, climate resilience (infrastructure), water and wastewater management, waste and by-product handling, packaging, sourcing of raw materials and agricultural inputs. ▪ In addition, the policy outlines procurement practices and management of the upstream value chain in relation to environmental matters. ▪ The Policy ensures compliance with environmental and climate laws and obligations. ▪ Progress in these areas is monitored and managed through clearly defined targets, actions and performance metrics within each topic.	▪ The Policy is applicable across all global operations in the Group, covering employees, contractors, and visitors, including those working off-site. In addition, the Policy covers the upstream value chain.	▪ The Chief Sustainability Officer is responsible for implementation of the Policy. ▪ The Group is committed to full compliance with environmental laws and regulations, maintaining the International Organisation for Standardization (ISO) 14001-certified environmental management system, and continuously improving the risk management processes to achieve the goal of zero environmental incidents [MDR-P_65d].

Renewable Electricity Policy

Background	Key content [MDR-P_65a]	Scope / Key stakeholders [MDR-P_65b]	Accountability [MDR-P_65c]
▪ The Group has established a Renewable Electricity Policy to support the transition to a low-carbon energy system and reduce its dependence on fossil fuels. ▪ This Policy outlines the Group's commitment to sourcing XX% of its electricity, both generated on-site and purchased externally—from renewable sources. [E1-2_25]	▪ It explains how the Group plans to invest in renewable sources and the pathway towards Net-Zero GHG emissions in 2050. ▪ It describes the approach in respect of procurement practice for electricity, supplier engagement regarding renewable energy and diversification of the electricity sources. ▪ The Policy ensures compliance with the relevant energy and environmental regulations and maintaining transparency in energy sourcing practices.	▪ This Policy applies globally to all companies in the Group and to the value chain.	▪ The Chief Sustainability Officer is accountable for the implementation of this Policy across all operations. ▪ The Group is committed to full compliance with relevant energy and environmental regulations and to maintaining transparency in its energy sourcing practices. The goal is to continuously improve energy performance and contribute to a more sustainable energy future [MDR-P_65d].

3.5.2 E1-3 Actions and resources in relation to climate change policies

The Group recognises the critical importance of addressing the impacts, risks and opportunities of climate change throughout the whole value chain [MDR-A_68b]. Its commitment to sustainability is reflected in the ongoing efforts to mitigate climate-related impacts and to adapt to the evolving environmental landscape. By investing in innovative technologies, nature-based solutions and sustainable practices, the Group aims to achieve the climate-related policies objectives and contribute positively to the environment [E1-3_27, 28, 29c(ii), 16c].

The climate mitigation actions categorised by decarbonisation levers are listed in the table in this section. The already achieved GHG emission reductions as a result of these actions can be found in section 3.5.3 [E1-3_29b]. The expected GHG reductions are depicted in the Transition Plan included in section 3.4.1 [MDR-A_68a; E1-3_29b].

As explained in the Group's Transition Plan, in order to become Net-Zero, the largest reduction in GHG emissions needs to be achieved in Scope 3 GHG emissions. The related actions are part of the "Supplier engagement" decarbonisation lever. Although achieving these targets is challenging as the Group is dependent on the actions of its partners in the value chain, the Group is actively engaging with suppliers in order to achieve these targets. The Group provides supplier trainings, it includes GHG reporting requirements and SBTi aligned emission targets in all supplier contracts, it prioritises suppliers who adhere to environmentally friendly practices and it forms close partnerships with local farmers in Europe and Asia to promote sustainable agricultural practices. Although the progress is moving at a slower pace than expected, the Group sees a gradual improvement stemming from these initiatives [MDR-A_68e]. For information on the other actions, please refer to the table below.

The decarbonisation levers are supported by nature-based solutions. For example, in 2026, the Group has plans to initiate a reforestation project in collaboration with local communities in Asia to restore XX hectares of degraded land, with completion expected by XX year [MDR-A_68c].

Also, the Group has identified actions to address physical risks which are not covered in the decarbonisation lever table below. These actions are presented in the resilience analysis (please refer to section 3.2.2).

To implement these climate change mitigation and adaptation actions, the Group has allocated significant financial investments. Please refer to the Transition Plan in section 3.4.1 for a description of the current year operational and capital expenditures (OpEx and CapEx) and to the section on anticipated financial effects (please refer to section 3.7) for expected expenditures for the future [E1-3_29c]. The Group has established key performance indicators to monitor progress, including energy intensity (total energy consumption divided by total net revenue) (please refer to section 3.6.1) [E1-3_AR_20, 21, 22].

Decarbonisation Lever [E1-3_29a; MDR-A_68a]	Description	Scope key actions [MDR-A_68b]	Time horizons to complete [MDR-A_68c]
Electrification of fleet	▪ Replace diesel delivery trucks with electric vehicles	Own operations All regions	XX year
Energy efficiency improvements	▪ Retrofit buildings with LED lighting and motion sensors ▪ Optimise brewing process ▪ Install smart energy meters to track and reduce usage	Own operations All regions	XX year
Refrigeration upgrades	▪ Replace old refrigeration units with low-GWP refrigerant systems ▪ Improve insulation in cold storage areas ▪ Use smart controls for temperature regulation	Own operations All regions	XX year
Renewable Energy Transition	▪ Sign Power Purchase Agreements (PPAs) with local solar/wind providers ▪ Install rooftop solar panels at production and bottling sites ▪ Buy certified renewable electricity	Own operations All regions	XX year
Supplier engagement	▪ Conduct supplier training and set SBTi aligned emission targets	Upstream value chain All regions	XX year

Decarbonisation Lever [E1-3_29a; MDR-A_68a]	Description	Scope key actions [MDR-A_68b]	Time horizons to complete [MDR-A_68c]
	▪ Introduce GHG reporting requirements in supplier contracts ▪ Partner with local farmers in Europe and Asia to promote sustainable agricultural practices ▪ Prioritise suppliers who adhere to environmentally friendly practices		
Product reformulation	▪ Replace high-emission ingredients with lower-impact alternatives ▪ Optimise recipes for energy-efficient brewing	Upstream value chain Own operations All regions	XX year
Sustainable logistics	▪ Shift from air freight to rail or sea freight ▪ Collaborate with logistics partners using biofuels or electric vehicles ▪ Optimise distribution routes	Upstream value chain All regions	XX year
Circular packaging	▪ Minimize waste generation and maximize recycling ▪ Reduce plastic waste and transition to biodegradable packaging solutions ▪ Increase recycled content in glass/aluminium packaging ▪ Transition to reusable kegs & bottles ▪ Eliminate plastic rings, introduce biodegradable or paper-based alternatives	Upstream value chain All regions	XX year

Commentary on the ESRS sustainability disclosures

As the disclosures relating to the Commission Delegated Regulation (EU) 2021 / 2178 (EU Taxonomy) are not in scope of this illustrative sustainability statement, the information relating to these datapoints is not included [E1-3_29c(ii)].

3.5.3 E1-4 Targets related to climate change mitigation and adaptation

The table below shows the Group's targets regarding climate change.

Target [MDR-T_80b]	Target year	Target level	Unit	Base year [E1-4_34c]	Base year value [E1-4_34c]	2025	2024
XXX% absolute reduction in Scope 1 and 2 GHG emissions	2030	XX%	$MtCO_2e$	2020	XX	XX%	XX%
XXX% absolute reduction in Scope 3 GHG emissions	2030	XX%	$MtCO_2e$	2020	XX	XX%	XX%
Net-Zero emissions across all Scopes	2050	XX	$MtCO_2e$	2020	XX	XX	XX

As part of the Group's commitment to sustainability and to respond to the expectations of stakeholders [MDR-T_80h], the Group has set measurable targets based on 1.5°C cross-sectoral decarbonisation pathways (as aligned with the Paris Agreement) [E1-4_33; MDR-T_80a]. The Group identified targets both for Scope 1 and 2 GHG emissions as well as for Scope 3 GHG emissions. In addition, this is extended to the Net-Zero emissions target, expected to be reached in 2050, which means that the remaining GHG emissions (<10%) will be neutralised through high-quality, certified carbon removals [MDR-T_80b]. The specific removal methods and the timeline for implementation are currently under evaluation. These targets are all in absolute values [E1-4_34a].

As described in the Group's Transition Plan, the Group has identified decarbonisation levers and is adopting new technologies in order to achieve these targets [E1-4_AR_30b]. Please refer to section 3.4.1 for details on the quantitative contributions of the decarbonisation levers selected to achieve the reduction targets [E1-4_34f; E1-4_AR_30a,30c]. There have been no changes to these targets compared to the prior year [MDR-T_80i].

As indicated in the table, the Group currently has only set specific targets related to GHG emissions. No specific targets were established for the material climate change-related risks and opportunities the Group identified through ongoing efforts to accurately fully quantify the anticipated financial effects. The Group is actively exploring methodologies to enhance its ability to measure these effects fully in the future, in order to have sufficient information to set a realistic target and to track the effectiveness of the related policies and actions [MDR-T_81b].

The Group measures progress on the above targets on a quarterly basis by comparing it to Group's expected progress. The actual GHG emissions for 2025 and 2024 are approximately in line with expectations for Scope 1 and 2 GHG emissions. However, for Scope 3 GHG emissions, the Group is behind its expected pathway. As a result, the Group plans to intensify actions as described in section 3.5.2. Metrics used relate to absolute emissions, tracked through the environmental management system for Scope 1 and 2 GHG emissions, and the supplier engagement platform and internal carbon accounting systems for Scope 3 GHG emissions. The metric for the share of emissions neutralised as part of the Net-Zero target, to be reached in 2050, will be considered in the future as the Group does not yet neutralise emissions [MDR-T_80j].

Methodology

Targets related to climate change mitigation and adaptation [MDR-T_80f]

The Group's targets are absolute targets, measured in $MtCO_2e$, committing to a fixed reduction in total GHG emissions, regardless of business growth [MDR-T_80b; E1-4_34a].

The targets and underlying methodology are validated by SBTi following a 1.5°C cross-sectoral decarbonisation pathway and, as such, they are based on conclusive scientific evidence [MDR-T_80g]. This pathway is based on the IEA Net-Zero Emission by 2050 Scenario and assumes progressive decarbonisation of the power sector, improved energy efficiency and low-carbon technology deployment. The underlying methodology follows SBTi's guidance for target setting for Scope 3 GHG emissions, including category-level hotspot analysis and supplier-level interventions. Emission factors and data sources include CDP disclosures, supplier surveys, and internal LCA tools [MDR-T_80f, 80g; E1-4_34e].

In line with its base-year recalculation policy, the Group reviews and updates its emissions reduction targets every five-year period, starting from the base year in 2020. As such in 2025, following a review of targets, no significant changes were deemed necessary. No interim targets have been set as yet [MDR-T_80e; E1-4_34d].

As there have been no significant changes to the Group's reporting or target boundaries, the original base year remains valid and has not been adjusted. The base year reflects typical operational conditions and has not been influenced by exceptional external factors. As no new baseline has been introduced, the achievement of targets and the presentation of progress over time remain unaffected [E1-4_AR_25a, 25b].

There were no changes in the methodology made since its initial setting. Any future updates will be disclosed together with the rationale and impact on comparability [MDR-T_80i].

Targets related to Scope 1 and 2 GHG emissions

The targets cover Scope 1 and 2 GHG emissions from all brewery operations globally, aligned with the GHG inventory boundaries reported in section 3.6.2 [MDR-T_80c; E1-4_34b].

For Scope 2 GHG emissions, market-based emissions are taken as a reference.

Key assumptions include continued access to renewable energy, technological advancements (e.g., electric boilers, biogas systems), and stable regulatory frameworks. Local action plans are tailored to site-specific conditions and cost-benefit analyses. The data and methodology used to estimate reduction trajectories are aligned with current best practices but have not yet been externally assured [MDR-T_80f, 80g; E1-4_34e; E1-4_AR_24, 26].

Target related to Scope 3 GHG emissions

The target related to Scope 3 GHG emissions does not cover all categories across our upstream and downstream value chain. The focus is on high-impact areas from Category 1 (raw material /ingredients), Category 9 (distribution of finished products), and Category 12 (products end of life and recycling). The GHG inventory boundaries are aligned with those reported in section 3.6.2. The target applies globally across all markets [MDR-T_80c; E1-4_34b].

Key assumptions include continuous supplier engagement, product reformulation, packaging redesign, and logistics optimisation. The underlying methodology follows SBTi's guidance for Scope 3 target setting, including category-level hotspot analysis and supplier-level interventions. Emission factors and data sources include CDP disclosures, supplier surveys, and internal LCA tools [MDR-T_80f, 80g; E1-4_34e].

Target related to Net-Zero GHG emissions

This target extends the targets related to Scope 1, 2 and 3 GHG emissions by neutralising the remaining XX% GHG emissions through high-quality, certified carbon removals. As such, the information described above is also applicable for this target.

It assumes continued decarbonisation of energy systems, supplier engagement, product innovation, and access to certified carbon removals for residual emissions [MDR-T_80g; E1-4_34e].

3.6. Metrics

3.6.1 E1-5 Energy consumption and mix

The main usage and consumption of energy is from power supply to machinery, refrigeration, and lighting systems. District gas and steam are used for heating during mashing, boiling, and sanitation processes.

Total energy consumption in MWh related to the Group's operations:

Energy consumption and mix		2025	2024
1.	Fuel consumption from coal and coal products (MWh) [E1-5_38a]	XXX	XXX
2.	Fuel consumption from crude oil and petroleum products (MWh) [E1-5_38b]	XXX	XXX
3.	Fuel consumption from natural gas (MWh) [E1-5_38c]	XXX	XXX
4.	Fuel consumption from other fossil sources (MWh) [E1-5_38d]	XXX	XXX
5.	Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh) [E1-5_38e]	XXX	XXX
6.	Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5) [E1-5_37a]	XXX	XXX
7.	Share of fossil sources in total energy consumption (%) [E1-5_AR_34]	XXX	XXX
8.	Consumption from nuclear sources (MWh) [E1-5_37b]	XXX	XXX
9.	Share of consumption from nuclear sources in total energy consumption (%) [E1-5_AR_34]	XXX	XXX
10.	Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh) [E1-5_37c(i)]	XXX	XXX
11.	Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh) [E1-5_37c(ii)]	XXX	XXX
12.	Consumption of self-generated non-fuel renewable energy (MWh) [E1-5_37c(iii)]	XXX	XXX
13.	Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10) [E1-5_37c]	XXX	XXX
14.	Share of renewable sources in total energy consumption (%) [E1-5_AR_34]	XXX	XXX
15.	Total energy consumption (MWh) (calculated as the sum of lines 6, and 11) [E1-5_37]	XXX	XXX

In 2025, the Group produced XXX MWh (2024: XXX MWh) of renewable energy from solar power [E1-5_39].

Commentary on the ESRS sustainability disclosures

Information about non-renewable energy production [E1-5_39] is not presented as it is not produced by the Group.

Methodology [MDR-M_77a,77c]

Energy consumption

For the calculation of energy consumption, data was supplied by the Group companies, which mainly included information from supplier invoices and meter readings. When actual data was unavailable, consumption was estimated using a standard per-square-meter consumption rate, derived from actual data.

Total energy consumption for own operations encompasses fuel usage at the sites, fuel consumption in both owned and leased vehicles, and the use of purchased and self-generated energy (including electricity, heat, and cooling). Each company in the Group reports energy consumption data by energy type. Fuel consumption at sites and by vehicles is categorized into fossil fuels (such as oil and petroleum products, natural gas, liquefied petroleum gas (LPG) and other fossil sources).

Purchased energy is divided into renewable (with certificates) and non-renewable (without certificates). Self-generated renewable energy is derived from solar power. Lower heating values are used to convert fuel consumption into energy. The Group sources its renewable electricity through Guarantees of Origin (GoO), renewable energy certificates (RECs), and PPAs. Energy that is purchased and subsequently sold is not included in the energy consumption figures.

The Group's renewable energy consumption includes the Group's purchase of GoO for renewable electric energy issued by energy suppliers. The calculations have not undergone third-party verification [MDR-M_77b].

Energy intensity

All revenue-generating activities relate to the "the manufacture of beverages[7]" or related supporting activities. This is designated as a high climate impact sector[8]. As the Group is not active in other sectors, all its activities and revenue come from activities in high climate impact sectors.

Energy intensity [MDR-M_77d; E1-5_40]	Unit	2025	2024	% change
Energy intensity from activities in sectors with a high climate impact [E1-5_41, 43]	kWh/€ million	XX	XX	XX%

The net revenue figure used is €XXX (2024: € XXX), consistent with the revenue reported in Note X of the Group's consolidated financial statements. [E1-5_43; MDR-M_77a, 77c]

Methodology

Energy intensity from activities in sectors with a high climate impact is calculated by dividing total energy consumption by total net revenue, given that all the Group's activities and revenue relate to a high climate impact sector.

3.6.2 E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions

The Group's Scope 1, 2 and 3 GHG emissions are shown in the table below, disaggregated by scope and emissions source. The main GHG emissions are associated with the crop process and activities related to the plant cultivation process, processing, transportation and storage of products and delivery to the point of sale. These activities are mainly matched with Scope 3 Category 1 – agricultural sourcing, Category 9 – downstream distribution and Category 12 – end of life treatment of sold products. [E1-6_AR_41]

Gross GHG emissions

A table of gross Scope 1, 2, and 3 GHG emissions in $MtCO_2e$ is provided below. [E1-6_44, 48a, 48b, 49a, 49b, 51, 52a, 52b]

[7] Classified using the NACE C section sector classification as outlined in Regulation (EC) No 1893/2006.
[8] The manufacture of beverages is designated as a high climate impact in Commission Delegated Regulation (EU) 2022/1288.

GHG Emissions	Retrospective 2020 Base year	2025	2024	% 2025/2024	Milestones and target years 2030	2050	Annual % target/base year
In $MtCO_2e$							%
Scope 1 | GHG emissions from operations	XXX	XXX	XXX	XX%	XXX	XXX	XX%
Percentage of Scope 1 GHG emissions from regulated emissions trading schemes	n/a	n/a	n/a				
Scope 2 Energy indirect GHG emissions					XXX	XXX	
Scope 2 | market based	XXX	XXX	XXX	XX%			XX%
Scope 2 | location based	XXX	XXX	XXX	XX%			XX%
Scope 3 | indirect GHG emissions	XXX	XXX	XXX	XX%	XXX	XXX	XX%
Scope 3.1 | Purchased goods and services	XXX	XXX	XXX	XX%			
Scope 3.2 | Capital goods	XXX	XXX	XXX	XX%			
Scope 3.3 | Fuel and energy related activities (not included in Scope 1 or 2)	XXX	XXX	XXX	XX%			
Scope 3.4 | Upstream transportation and distribution	XXX	XXX	XXX	XX%			
Scope 3.5 | Waste generated in operations	XXX	XXX	XXX	XX%			
Scope 3.6 | Business travel	XXX	XXX	XXX	XX%			
Scope 3.7 | Employee commuting	XXX	XXX	XXX	XX%			
Scope 3.8 | Upstream leased assets	Not material						
Scope 3.9 | Downstream transportation	XXX	XXX	XXX	XX%			
Scope 3.10 | Processing of sold products	Not material						
Scope 3.11 |Use of sold products	XXX	XXX	XXX	XX%			
Scope 3.12 | End-of-life treatment of sold products	XXX	XXX	XXX	XX%			
Scope 3.13 | Downstream leased assets	Not material						
Scope 3.14 | Franchises	Not material						
Scope 3.15 | Financial investments	Not material						
Total GHG emissions (market-based)	XXX	XXX	XXX	XX%	XXX	XXX	XX%
Total GHG emissions (location-based)	XXX	XXX	XXX	XX%	XXX	XXX	XX%

Note: The Group does not have operational control over investees that are not consolidated in the financial statements. As a consequence, the additional breakdown as required by ESRS E1 E1-6 paragraph 50 is not applicable.

The table below shows the GHG emissions by location and significant assets:

GHG emissions in MtCO2e split by location and significant asset [E1-6_AR_41]

		2025			2024		
Asset	**Location**	**Scope 1**	**Scope 2**	**Scope 3**	**Scope 1**	**Scope 2**	**Scope 3**
Production facility	Euroland	XXX	XXX	XXX	XXX	XXX	XXX
Production facility	Asialand	XXX	XXX	XXX	XXX	XXX	XXX
Fleet	Euroland	XXX	XXX	XXX	XXX	XXX	XXX
Fleet	Asialand	XXX	XXX	XXX	XXX	XXX	XXX
Machinery and equipment	Euroland	XXX	XXX	XXX	XXX	XXX	XXX
Machinery and equipment	Asialand	XXX	XXX	XXX	XXX	XXX	XXX
All other assets	Euroland	XXX	XXX	XXX	XXX	XXX	XXX

Methodology [E1-6_AR_39b]

Definitions

Emission: the direct or indirect release of substances, vibrations, heat or noise from individual or diffuse sources into air, water or soil.

Greenhouse Gases (GHG): The gases listed in Part 2 of Annex V of Regulation (EU) 2018/1999 of the European Parliament and of the Council.

Standards applied

Emissions have been calculated in accordance with ESRS and considering the GHG Protocol.

The Group mainly applies:

- The Greenhouse Gas Protocol - a Corporate Accounting and Reporting Standard
- GHG Protocol Scope 2 Guidance - An amendment to the GHG Protocol Corporate Standard
- Technical Guidance for Calculating Scope 3 Emissions Supplement to the Corporate Value Chain (Scope 3) Accounting & Reporting Standard

All GHG emissions are calculated in $MtCO_2e$ and include relevant gases such as CO_2, CH_4, N_2O, HFC, PFC, SF_6, NF_3.

Approach to the data management and calculation

The Group uses a combination of primary data (e.g., direct energy use, transport data, direct information about the emissions from the energy provider) and secondary data (e.g. LCA, estimates based on the average annual consumption of the energy, data based on the comparative year, etc.) as well as other EEIO (Environmentally Extended Input-Output) based databases.as well as other EEIO- (Environmentally Extended Input-Output))--based databases.

Most necessary data for GHG accounting is available and collected annually. There were no significant changes in estimation techniques and boundary adjustments compared to the previous reporting year[E1-6_AR_39b].

The Group calculates metrics using a structured approach that prioritises data provided directly by suppliers. Where supplier data is incomplete, the Group supplements it with internal records and recognised secondary sources, including peer-reviewed literature and public databases. All metrics are clearly defined and labelled to ensure clarity and consistency. While these figures are not subject to external validation, they are thoroughly reviewed internally to confirm methodological relevance [MDR-M_77a, 77b, 77c].

Reporting boundaries

For Scope 1 and 2 GHG emissions, the reporting boundary is the same as for the financial statements as the Group does not have operational control of investees which are not consolidated in the financial statements. Both operational and financial leased assets are included in the GHG inventory.

The reporting boundary for Scope 3 extends across the full value chain from agricultural sourcing and packaging to downstream distribution, consumption and end-of-life treatment, reflecting the Group's integrated global structure and local market presence.

Scope 1 and 2 GHG emissions

The amount of emissions from the generation of purchased energy according to the market-based method was calculated using indicators published by energy suppliers (where the supplier was known). For electricity from RES (Renewable Energy Sources) confirmed by guarantees of origin, an emission factor of 0 $MtCO_2e$ was used. If the heat energy supplier did not provide data, the indicators were adopted in accordance with data from International Energy Agency (IEA), with regional adjustments applied based on IEA data for non-OECD Asia and Europe to reflect the locations of the Group's operations. Global Warming Potential (GWP) used in the calculations are in accordance with the IPCC's Fifth and Sixth Assessment Report (AR5/AR6). The base year is 2020.

The emission factor at consumption (EFC) was used in the calculation of Scope 2 location-based GHG emissions to reflect a more prudent approach. The use of this indicator ensures that GHG emissions resulting from transmission losses are included in the calculation. The data used and the calculation for Scope 2 GHG emissions were based on actual energy consumption [E1-6_44; E1-6_AR_39].

Scope 3 GHG Emissions [E1-6_AR_46g, 46h, 46i]

The Group reports Scope 3 GHG emissions for the significant categories for its business model.

Across all Scope 3 GHG categories, the proportion of the GHG emissions based on primary data from suppliers or other value chain partners was XX% (2024: XX%). Significant categories include:

1. **Category 1:** Purchased Goods and Services – Emissions from the production of raw materials, ingredients, and packaging materials used in its beverages. This is the most significant category.
2. **Category 2**: Capital goods - Emissions related to the production of machinery and equipment that the Group acquires.
3. **Category 3:** Fuel-and Energy-Related Activities (not included in Scope 1 or 2 GHG emissions) – Emissions from upstream fuel production and energy transmission losses.
4. **Category 4:** Upstream Transportation and Distribution – Emissions associated with outsourced logistics providers that transport ingredients and packaging to its facilities.
5. **Category 5:** Waste generated in operations – Emissions from treatment and disposal of waste produced in own operations.
6. **Category 6:** Business Travel – Emissions resulting from travel by employees for work purposes.
7. **Category 9:** Downstream Transportation and Distribution – Emissions linked to the distribution of finished products to customers.
8. **Category 11:** Use of Sold Products – Emissions primarily related to the energy consumption of product cooling after sale.
9. **Category 12:** End-of-Life Treatment of Sold Products – Emissions related to the disposal and recycling of packaging materials.

In the report, the Group does not include GHG emissions from cloud computing and data centre services. The Group assessed that these emissions are immaterial to its operations in relation to the business model.

Below is the summary of used emission factor databases and boundaries during the quantification of the Scope 1, Scope and Scope 3 GHG emissions with the specific methodologies and assumptions [E1-6_AR_46h]:

Emission factor databases used in the methodology	Source of emission	Database source	Reporting boundary
Scope 1 GHG emissions	Refrigerators, boilers Low level of uncertainty – use of primary data	DEFRA 2024 database (DEFRA - Department for Environment, Food and Rural Affairs)	Reporting boundary agrees with the financial statements
Scope 2 GHG emissions	Energy consumption bought from the providers Medium level of uncertainty - 30 % of data based on an average amount from the comparative year	Location based: IEA for Asia and Europe Market based: Indicators from the suppliers – actual energy consumption	Reporting boundary agrees with the financial statements
Scope 3			
Cat. 1 Purchased Goods and Services	Production of raw materials, ingredients, etc. High level of uncertainty - lack of information on the weight of raw materials; data based on procured materials' value (spend based method)	Suppliers' indicators, other external databases based on EEIO (Environmentally Extended Input-Output)	Cradle-to-gate emissions of purchased goods
Cat. 2 Capital Goods	Production of machinery and equipment	Internal procurement, other external databases based on EEIO	Capital goods used in owned operations (CapEx-based)

	Low level of uncertainty – data based on real weights of the machinery		
Cat. 3 Fuel and Energy Related Activities	Upstream fuel production and energy transmission. Medium level of uncertainty – lack of data from the energy providers in Asia; some data was extrapolated based on comparable energy providers	DEFRA 2024 database	Upstream emissions only
Cat 4. Upstream Transportation and Distribution	Outsourced logistic providers High level of uncertainty – 80 % data based on value of the services	Other external databases based on EEIO	Transport by third-party logistics providers under contractual relationship
Cat. 5 Waste generated in operations	Waste treatment, recycling. Medium level of uncertainty – data estimated based on the average weight of the wastes from the facilities	DEFRA 2024 database	Waste treatment of operational and production sites
Cat. 6 Business Travel	Flights, hotels, rental cars for travel by employees. Low level of uncertainty – data based on the internal tracking system	Internal travel booking systems	Travel paid for by the Group
Cat. 7 Employee commuting	Travel from home to workplace. High level of uncertainty - estimated data based on surveys from employees	DEFRA 2024 database for fuel usage	Based on average distance and mode of transport of all employees
Cat. 9 Downstream transportations	Distribution of finished products. High level of uncertainty – EEIO methodology based on the value of the goods and surface	Other external databases based on EEIO	Third-party distribution to final point of sale
Cat. 11 Use of sold products	Energy consumption of product cooling after sale. High level of uncertainty - EEIO methodology based on the value of the goods	Other external databases based on EEIO	Includes average energy use of coolers and fridges by customers
Cat. 12 End of life treatment	Emission from the disposal and the recycling. High level of uncertainty – EEIO methodology based on the value of the goods	Other external databases based on EEIO	Global average assumptions for waste handling by end-consumers

Other information regarding GHG emissions

GHG Emissions Intensity

GHG Emissions intensity	Unit	2025	2024
GHG Intensity (location-based)	(MWh/€ million)	XX	XX
GHG Intensity (market-based)	(MWh/€ million)	XX	XX

The net revenue figure used is €XXX (2024: €XXX), consistent with the revenue reported in Note X of the Group's consolidated financial statements [E1-6_53, 55; E1-6_AR_55a].

Biogenic Emissions

The Group does not report separately on biogenic emissions from the combustion of biomass and biogas in the greenhouse gas inventory as these emissions, primarily resulting from the use of bio-based fuels and renewable ingredients in beverage production, are currently not material to the climate impact assessment [E1-6_AR_43c, 45e, 46j].

Significant Events and Changes in Value Chain Reporting

There were no significant changes in the Group's definition of what constitutes the reporting undertaking and its upstream and downstream value chain [E1-6_47].

GHG emissions with contractual instruments

XX% (2024: XX%) of Scope 2 market-based GHG emissions are associated with contractual instruments such as green energy PPAs and renewable energy attribute certificates (EACs) [E1-6_AR_45d].

Methodology

GHG Intensity is calculated by dividing the gross GHG emissions by total net revenue as included in Note X of the financial statements.

3.6.3 E1-7 GHG removals and GHG mitigation projects financed through carbon credits

The brewery is not currently engaged in GHG removal or storage activities, nor has it financed any GHG emissions reduction through the purchase of carbon credits to date [E1-7_56a, 56b]. However, the Group aims to become Net-Zero. The Group has set science-based climate targets to reduce GHG emissions across all scopes as described in section 3.5.3 [E1-7_61a].

To support its long-term Net-Zero goal, the Group plans to neutralize up to XXX % of its base year emissions by purchasing high-quality GHG removal credits, specifically for residual emissions that cannot be eliminated through direct mitigation measures. The use of credits is designed to complement – not substitute – the Group's decarbonisation efforts. The Group's primary focus continues to be real and measurable emission reduction, with neutralisation used only as a last resort, complementing its commitment to substantial real reductions aligned with the SBTi's cross-sectoral decarbonisation pathway. As there is currently no sector-specific decarbonisation pathway for the food and beverage processing sector under the SBTi, the Group uses the cross-sectoral pathway as a benchmark for its targets. While the specific removal methods and the timeline for implementation are currently under evaluation, the Group is exploring options both within its own operations and across upstream and downstream value chains [E1-7_60, 61b].

The Group is committed to using only high-integrity carbon removal credits that meet internationally recognised quality standards, such as ICROA (The International Carbon Reduction and Offset Alliance) endorsed programs, Verra's Verified Carbon Standard (VCS) and Gold Standard. These credits will be transparently reported and subject to third-party verification to ensure environmental integrity and alignment with best practices [E1-7_61c].

3.6.4 E1-8 Internal carbon pricing

Internal Carbon Pricing Policy

In 2024, the Group dedicated efforts to developing its Internal Carbon Pricing Policy, which was formally approved and implemented early 2025. The policy establishes a structured pricing model for capital expenditures (CapEx) and research & development (R&D) investments, utilising shadow prices for Scope 1, Scope 2 and Scope 3 GHG emissions [E1-8_63a].

Each project proposal undergoes a thorough assessment of its carbon footprint and financial implications, ensuring alignment with the Group's sustainability strategy. This approach promotes investments in projects that contribute to emission reduction targets [E1-8_63a] while maintaining financial viability and sustainable returns [E1-8_62]. The pricing mechanism also encourages innovation by guiding resource allocation towards low-carbon technologies, reinforcing the Group's commitment to climate neutrality as described in section 3.4.1 [E1-8_63a].

The established shadow prices remain uniform across all operational regions and entities within the Group, covering all activities and geographies [E1-8_63b]. The current pricing framework enables the assessment of potential investments' long-term feasibility in relation to the Group's carbon reduction objectives and anticipated future carbon pricing regulations. Further enhancements to the scheme are planned, including the implementation of region-specific (Europe, Asia) shadow pricing by 2026.

Scope	Carbon prices applied [E1-8_63c]	Approximate gross GHG emission volumes covered by the Internal Carbon Pricing Scheme in 2025 ($MtCO_2e$) [E1-8_63d]	Share of overall GHG emissions (%) [E1-8_63d]
Scope 1:	€XXX	XXX	XX%
Scope 2:	€XXX	XXX	XX%
Scope 3:	€XXX	XXX	XX%

No comparatives are provided as the Group implemented internal carbon pricing in 2025.

The table above shows information about the carbon prices applied and the respective volumes of GHG emissions covered by the internal carbon pricing scheme. The internal carbon price is subject to an annual review process to ensure alignment with evolving market conditions and regulatory developments.

Carbon prices used in the internal carbon pricing scheme are not utilised in the financial statements [E1-8_AR_65].

Methodology

The methodology for establishing shadow prices is informed by internationally recognised sources, including International Energy Agency (IEA) publications, the Network of Central Banks and Supervisors for Greening the Financial System (NGFS) climate scenarios, and the World Bank Carbon Pricing Dashboard. More specifically: [MDR-M_77a]

1. Carbon pricing insights were extracted from IEA reports on energy transition pathways and future policy projections.
2. NGFS climate scenarios were analysed to assess projected carbon costs under various regulatory frameworks.
3. Global carbon pricing benchmarks from the World Bank Carbon Pricing Dashboard were used to compare existing market-based mechanisms.
4. Internal sustainability objectives were integrated to ensure alignment with Scope 1, Scope 2 and Scope 3 GHG emissions reduction strategies [E1-8_63c]

3.7. E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

Commentary on the ESRS sustainability disclosures

An entity is allowed to omit the information required by ESRS E1-9 (anticipated financial effects from material physical and transition risks and potential climate-related opportunities) for the first year of preparation of its sustainability statement. Additionally, for the first three years of preparation of an entity's sustainability statement, the ESRS permit an entity to only include qualitative disclosures about ESRS E1-9 if it is impracticable to prepare quantitative disclosures.

For the Group, the following data points have been illustrated in relation to the anticipated financial effects in the short-, medium-and long-term.

- Anticipated financial effects from material physical risk [E1-9_66a, 66b, 66c] (please refer to section 3.7.1)
  - The monetary amount and proportion (percentage) of assets at material physical risk over the short-, medium- and long-term before considering climate change adaptation actions
  - The proportion of assets at material physical risk addressed by the climate change adaptation actions
  - The location of significant assets at material physical risk
- Anticipated financial effects from material transition risk [E1-9_67a, 67b, 67c, 67d, 67e] (please refer to section 3.7.2)

- The monetary amount and proportion (percentage) of assets at material transition risk over the short-, medium- and long-term before considering climate mitigation actions
- The proportion of assets at material transition risk addressed by the climate change mitigation actions
- A breakdown of the carrying value of the undertaking's real estate assets by energy-efficiency classes
- Liabilities that may have to be recognised in financial statements over the short and medium-term
- The monetary amount and proportion (percentage) of net revenue from its business activities at material transition risk over the short- and medium-term including, where relevant, the net revenue from the undertaking's customers operating in coal, oil and gas-related activities

This illustrative sustainability statement does not provide an illustration for the following datapoints.

- Anticipated financial effects from material physical risk [E1-9_66d]
  - The monetary amount and proportion (percentage) of net revenue from its business activities at material physical risk over the short- and medium-term
- Anticipated financial effects from material transition risk [E1-9_67d, 67e]
  - Liabilities that may have to be recognised in financial statements over the long-term
  - The monetary amount and proportion (percentage) of net revenue from its business activities at material transition risk over the long-term including, where relevant, the net revenue from the undertaking's customers operating in coal, oil and gas-related activities
- Potential to pursue material climate-related opportunities [E1-9_69,70]

The Group has evaluated its exposure to material physical risks over short-, medium-, and long-term horizons. Using the outcome of the climate scenario analysis (please refer to section 3.2.1) and resilience assessment (please refer to section 3.2.2), the Group determined the anticipated financial effects of the identified physical and transition risks separately [E1-9_AR_69b, 72b]. Identified risks primarily relate to extreme weather events and climate pattern changes for physical risks and to increasingly stringent environmental regulations aimed at reducing carbon emissions and promoting sustainability for transition risk.

The Group's assessment aligns with the ESRS-defined time horizons: short-term (2026), medium-term (2027-2031), and long-term (post-2031). These horizons align with the Group's strategic planning and capital allocation cycles with a detailed budget for the first year, budgets for years 2-5, and projections thereafter. Key assets, including production facility buildings and machinery, have useful lives of 15-30 years and 10-12 years, respectively, and are thus considered across all time horizons in the assessment [E1-9_AR_69b, 72b].

3.7.1 Anticipated financial effects from material physical risks

The scope of the Group's assessment encompasses all key operational assets, particularly those that are most susceptible to material physical risks. While the Group cannot fully quantify all effects at this stage, the Group provides qualitative insights along quantitative analyses, factoring in critical assumptions such as projected climate conditions, regulatory changes, and market dynamics. Limitations include uncertainties in long-term climate projections, the evolving nature of regulatory frameworks and market dynamics [E1-9_AR_69a].

Assets at material physical risk

The main assets that are at risk relate to the Group's production facilities in Euroland and Asialand. In Euroland, the brewery is situated near a river basin, making it particularly sensitive to seasonal water level fluctuations. In Asialand, the brewery is located in a region prone to cyclones, hurricanes and typhoons.

The following table provides an overview of the carrying amount of assets at material physical risk, considering both chronic and acute physical risks, before and after climate change adaptation actions. It includes details such as the description of assets, their location, the time horizon, the carrying amount and proportion and whether they have been considered for potential impairment assessment [E1-9_66a, 66b, 66c].

Please refer to section 3.3.1 for a description of the climate change adaptation actions.

Net revenue at material physical risk

As explained above and shown in the table below, the Group has significant assets, such as its production facilities, at physical risk. Since the Group's revenue streams come from these production facilities, this also places Group net revenue at material physical risk.

Commentary on the ESRS sustainability disclosures

The anticipated financial effects of net revenue over short-, medium-, and long-term horizons is not fully illustrated in this sustainability statement [E1-9_66d].

Carrying amount of assets at material physical risk										
			Before considerating climate change adaptation actions [E1-9_66a; E1-9_AR_70cii]							
Description of assets	Location[10] [E1-9_66c; E1-9_AR_70ci]	Description of time horizon [E1-9_66a]	At chronic physical risk[11]		At acute physical risk[11]		Both at chronic and acute physical risk[12]		Proportion of assets addressed by climate change adaptation actions[9] [E1-9_66b]	Considered for potential impairment assessment
Office	Euroland	Medium-, long-term	€	%	€	%	€	%	%	Yes
Production facility	Euroland	Medium-, long-term	€	%	€	%	€	%	%	Yes
Production facility	Asialand	Medium-, long-term	€	%	€	%	€	%	%	Yes
Fleet	Euroland	Medium-, long-term	€	%	€	%	€	%	%	No
Fleet	Asialand	Medium-, long-term	€	%	€	%	€	%	%	No
Machinery and equipment	Euroland	Medium-, long-term	€	%	€	%	€	%	%	Yes
Machinery and equipment	Asialand	Medium-, long-term	€	%	€	%	€	%	%	Yes
Total Property, plant and equipment			€	%	€	%	€	%	%	
Inventory	Euroland	Medium-, long-term	€	%	€	%	€	%	%	Yes
Inventory	Asialand	Medium-, long-term	€	%	€	%	€	%	%	Yes
Total Inventory			€	%	€	%	€	%	%	
Total assets at risk			€	%	€	%	€	%	%	

The figures in the table above are part of the total property, plant and equipment carrying amount as included in Note X of the Group's financial statements [E1-9_68a, 68b].

[9] % of assets addressed by climate change adaptation actions is calculated by dividing the at-risk portion of the carrying value of the at-risk assets that is addressed by adaptation actions by the total at-risk portion of the carrying value of the at-risk assets.
[10] EU Location's based on NUTS codes 3 level digits (Nomenclature of Territorial Units for Statistics).
[11]% of assets at chronic/acute physical risks is calculated by dividing the at-risk portion of the carrying value of the at-risk assets by the carrying value of the total assets as included in the statement of financial position in the financial statements.
[12] Assets subject to both chronic and acute physical risks: the values are adjusted to avoid double counting.

3.7.2 Anticipated financial effects from material transition risks

The scope of the Group's assessment covers all key operational assets at material transition risk. While the Group cannot fully quantify all impacts at this stage, the Group provides qualitative insights alongside quantitative analyses. The Group's methodology incorporates critical assumptions, including projected carbon pricing, regulatory changes, and shifts in consumer preferences. Limitations of the assessment include uncertainties in the evolving nature of regulatory frameworks and consumer preferences [E1-9_AR_72a]. For the Group's Transition Plan, please refer to section 3.4.1.

Assets at material transition risk

The Group has conducted a comprehensive assessment of its activities to identify exposure to material transition risks — those arising from the global shift toward a low-carbon economy. These risks include regulatory changes, evolving market expectations, technological advancements, and shifts in consumer behaviour that may impact the value or viability of certain assets.

As mentioned, the Group has identified one material risk for the short-, medium- and long-term in respect of increasingly stringent environmental regulations aimed at reducing carbon emissions and promoting sustainability.

This risk applies to the following assets as listed in the table above for assets at material physical risk: office in Euroland, the production facilities, fleet and machinery and equipment in both Euroland and Asialand [E1-9_67a].

For part of these assets, the Group has already taken climate change mitigation actions to address this risk. XX% of the Group's car fleet has already been replaced by electric vehicles. With respect to the Group's production facility in Euroland, which represents XX% of the assets at material transition risk, energy efficiency improvements have been implemented, and rooftop solar panels have been installed. As a result, the Euroland site is now categorised in the A energy efficiency class. Further energy efficiency improvements will be implemented for the site in Euroland, and the Group also plans to roll these improvements out at the Asialand facilities [E1-9_67b].

Please refer to section 3.5.2 for a further description of climate change mitigation actions.

Real estate energy efficiency breakdown

The table below provides an overview of the Group's real estate assets (production facilities and office) by energy-efficiency classes (EPC), including both owned and right-of-use assets [E1-9_67c; E1-9_AR_73b].

EPC label class	Total carrying amount of real estate assets by energy efficiency class (€ million)	Proportion of total real estate portfolio (%)
A–B (≤ 75 kWh/m²/year)	XXX	XX
C–D (76–150 kWh/m²/year)	XXX	XX
E or below (> 150 kWh/m²/year)	XXX	XX

The Group was unable to obtain information on the EPC label class for €X of the total carrying amount of the real estate assets. For these assets the energy consumption is based on internal estimates. Please refer to the information on methodology and assumptions below for more information [E1-9_AR_73b].

Stranded assets

As part of its assessment, the Group evaluated whether any material assets with significant locked-in GHG emissions could potentially become stranded. As outlined in the Transition Plan (please refer to section 3.4.1), the majority of locked-in emissions within the Group's operations are linked to energy consumption at production sites.

Given that the Group does not operate energy-intensive or fossil fuel-based production facilities and considering the strategy to replace assets at the end of their useful life with more sustainable alternatives, the Group has not identified any material assets that are at risk of becoming stranded [E1-9_AR_73a].

Liabilities

No material climate-related liabilities were recognised during the reporting period. In addition, the Group did not identify significant anticipated financial effects for liabilities that may have to be recognised in the financial statements over the short- and medium-term. However, future changes in local laws and regulations may give rise to such liabilities [E1-9_67d].

Commentary on the ESRS sustainability disclosures

The anticipated financial effects of liabilities that may have to be recognised in the financial statements over a long-term horizon are not fully illustrated in this sustainability statement [E1-9_67d].

Net revenue at material transition risk

Currently, the Group does not anticipate a material effect on net turnover as a result of the identified transition risk. However, some of the mitigation actions have impacted capital expenditures (CapEx) and operating expenditures (OpEx), as mentioned in the Transition Plan disclosures (please refer to section 3.4.1). For 2026 the Group plans to spend €XXX million in capital expenditures (CapEx) and €XXX million in operational expenditures (OpEx) for mitigating actions, mainly related to further energy efficiency improvements, sustainable logistics, circular packaging and renewable energy transition. For the period 2027-2031, the Group plans to spend approximately €XXX million in capital expenditures (CapEx) and approximately €XXX million in operational expenditures (OpEx). Given that the Group's budget relates to the first five years, the Group does not have this information for the long-term. However, the Group anticipates further capital expenditures and operational expenditures over the long-term [E1-9_67e].

Commentary on the ESRS sustainability disclosures

The anticipated financial effects of net revenue over a long-term horizon are not fully illustrated in this sustainability statement [E1-9_67e].

3.7.3 Potential to benefit from material climate-related opportunities

The Group identified a climate-related opportunity regarding the expansion of its product portfolio by using more sustainable beverage options. The Group anticipates that the increasing regulatory focus on carbon emissions and sustainability will drive demand for low-carbon products in the brewing industry. By strategically positioning itself in this market, the Group aims to capture a significant share of this market, thereby ensuring long-term growth and resilience in an evolving economic landscape.

Commentary on the ESRS sustainability disclosures

Potential to pursue material climate-related opportunities is not illustrated in this sustainability statement [E1-9_69, 70; E1-9_ AR_80, 81].

Methodology

Anticipated financial effects [MDR-M_77a; E1-9_AR_75]

Assessment of Physical Risks

To evaluate the anticipated financial effects of material physical risks, the Group applied a scenario-based methodology using the ABC Tool, which integrates global and regional climate models (GCMs and RCMs) to simulate localised climate hazards. The assessment focused on both acute risks (e.g., floods, heatwaves, storms) and chronic risks (e.g., rising temperatures, water stress), across the Group's operations in Europe and Asia.

The analysis was conducted across three time horizons — short-term (1 year), medium-term (1–5 years), and long-term (beyond 5 years) — aligned with the expected lifetime of assets and strategic planning cycles. Climate scenarios used were based on the IPCC's Sixth Assessment Report, specifically SSP1-2.6 (low-emissions) and SSP5-8.5 (high-emissions). Financial impacts were estimated by combining hazard exposure, asset vulnerability and damage functions derived from historical data, resulting in annual expected loss estimates.

The calculations have not undergone third-party verification [MDR-M_77b].

Assessment of Transition Risks

For transition risks, the Group assessed the potential financial effects on assets and revenue streams arising from regulatory, technological, and market shifts. The same time horizons and climate scenarios were applied, with a focus on risks such as carbon pricing, energy efficiency regulations, and customer decarbonisation trends.

The ABC Tool was also used to model transition risk exposure, incorporating sectoral benchmarks, policy trajectories and asset-level emissions data. The analysis included the identification of potentially stranded assets, and the results were integrated into capital allocation and investment planning.

The calculations have not undergone third-party verification [MDR-M_77b].

Key Assumptions and Limitations [MDR-M_77a]

1. Carbon pricing and regulatory trends were projected based on current Europe and Asian policy developments.
2. Asset vulnerability was assessed using structural characteristics and geographic exposure.
3. Customer risk profiles were used to estimate revenue sensitivity to transition pressures.
4. Limitations include uncertainties in long-term climate projections, the evolving nature of regulatory frameworks, market dynamics and consumer preferences.

Real estate energy efficiency breakdown

For a portion of the portfolio, particularly in Asialand where EPC certification is not mandatory or data is not readily available, the Group has applied internal estimation methodologies. These estimates are based on:

1. Historical utility consumption data
2. Building age and construction materials
3. Usage type and occupancy patterns

The Group is actively working to improve data quality through enhanced metering and energy audits.

4. Social information – Own workforce

4.1. S1 ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Its diverse workforce serves as the foundation of everything the Group does. The Group is dedicated to listening to and engaging with its workforce to create the best possible workplace. The Group's DMA has identified four negative material impacts, one positive material impact, three risks and one opportunity related to its workforce. The entire workforce, consisting of employees (please refer to section 4.3.1) and non-employees (please refer to section 4.3.2) [S1_SBM-3_14a] is potentially affected by these impacts and is included in the scope of a disclosure [S1_SBM-3_15].

The Group has identified one positive material impact relating to adequate wages, which can have positive impacts on overall satisfaction and quality of life of its employees and their families [S1_SBM-3_14c].

The identified negative material impacts — freedom of association and social dialogue, work-life balance, diversity and gender equality as well as forced and child labour — are not systemic within the Group's operations. These issues are primarily concentrated at the Group's Asialand production site, where there is increased risk as a result of the local legal and social environment. For this assessment, the World Bank's Governance Indicators were used [S1_SBM-3_14f(i), 14f(ii), 14g(i), 14g(ii)]. Diversity and gender equality may specifically be at risk in respect of women, people of colour, and members of the LGBTQI community as these groups often encounter systemic barriers and discrimination in various aspects of the workplace, including hiring practices, promotion opportunities, and pay equity [S1_SBM-3_16]. Forced and child labour present a higher risk in Asialand, based on the Modern Slavery Index and End of Childhood Index. [S1_SBM-3_14b].

The Group has also identified diversity and gender equality, health and safety and forced and child labour as material risks. The absence of diversity and gender equality can lead to a detrimental workplace culture, increasing the risk of increased employee turnover and challenges in attracting top talent. Further material risks for the Group include potential health and safety incidents in production, which are systemic across the industry. Child and forced labour can severely impact the working environment, posing significant legal, financial, and reputational risks [S1_SBM-3_14d].

No impacts or risks have been identified related to Transition Plans aimed at reducing negative environmental impacts and achieving greener, climate-neutral operations [S1_SBM-3_14e].

Finally, the Group believes that robust training and development opportunities represent an opportunity for the Group as they drive innovation and efficiency while fostering long-term organisational resilience [S1_SBM-3_14d].

The Group is committed to cultivating transparency and trust as a foundational principle in all its operations. This includes embracing difference and ensuring fairness, fostering equitable practices that promote inclusivity. Additionally, the Group prioritises empowering well-being and growth, creating an environment where every individual can thrive and contribute to collective success.

To achieve this, the Group has established specific targets that primarily address its material IROs [S1-4_38b; S1-4_38c]. These targets are detailed below in the respective topical sections on workforce diversity and compensation (section 4.3), collective bargaining, wage adequacy and human rights impacts (section 4.4) and workplace health, integration and skills (section 4.5) [S1-4_40a; S1-4_40b], along with the corresponding actions and metrics for implementation [S1-4_41; MDR-M_75]. Stakeholders, including employee resource groups and HR leadership, were involved in the target-setting process [MDR-T_80h]. Performance is tracked by the relevant internal departments [S1-5_47b] through a comprehensive review process [S1-5_47c] that incorporates employee feedback, stakeholder consultations, and an assessment of industry best practices [S1-4_39; S1-5_47a]. Additionally, the performance of targets, actions, and metrics is validated through an external audit [MDR-M_77b].

Current and Future Allocated Resources [MDR-A_69a, 69b, 69c; S1-4_43]: The Group maintains transparent disclosure of current and future financial resources allocated to its initiatives aimed at achieving set goals. Resources dedicated to business conduct are not tracked independently; instead, they are incorporated into the overall operational expenditures (OpEx) and capital expenditures (CapEx), reflecting the integration of key actions into regular operations at both the Group and market levels.

The Group has categorized ESRS sub-topics and sub-sub-topics into suitable topical chapters that align with its strategic ambitions. This structure reflects the commitment to fostering an environment of openness, fairness, and continuous improvement.

The table below shows the **IRO's identified** for S1 Own workforce and a **summary** of the related **policies, actions, metrics and targets** as further described in this section. The detailed information on the IROs, including their time horizons, location in the value chain as well as the process by which material IROs were identified, is comprehensively documented in sections 2.4.1 and 2.4.2.

Impacts, risks and opportunities	Category	Policy	Actions	Metrics	Target
Fair compensation for employees (e.g., wages, benefits, flexible working arrangements) beyond regulatory requirements supports a decent standard of living for employees and their families and can foster employee satisfaction and a positive work environment	⊕ P	▪ Human Rights Policy ▪ Global Pay Principles ▪ Diversity, Equity and Inclusion Policy	▪ Annual wage benchmarking vs. minimum wage ▪ Partnership with Fair Wage Network ▪ Annual Employee Survey	▪ S1-10 Adequate wages	▪ Providing XX% above living wage to all employees by 2030
The denial of employees' rights to **freedom of association and collective bargaining** (e.g., through non-compliance with union election rules) can directly impede their capacity to negotiate equitable salaries, working hours, and improved living and working conditions Such limitations, coupled with the potential absence of safe channels for employees to voice concerns and engage in **social dialogue**, can negatively impact employees by creating unfair working environments and reducing overall job satisfaction	⊖ P	▪ Human Rights Policy ▪ Global Framework Agreement ▪ Code of Conduct	▪ Whistleblower process ▪ Alignment with ILO 87 and ILO 98	▪ S1-8 Collective bargaining coverage and social dialogue	▪ Expanding Social Dialogue to XX% of Countries by 2030 ▪ Comprehensive Collective Bargaining Framework by 2030
A lack of **work-life balance** is likely to lead to a higher risk of occupational accidents, greater health risks, and negative effects on family life	⊖ A	▪ Human Rights Policy ▪ Parental Leave Policy ▪ Global Framework Agreements	▪ Flexible Work Initiative ▪ Parent-child office at HQ as a pilot ▪ Bi-annual employee survey	▪ S1-15 Work-life balance metrics ▪ S1-8 Collective bargaining coverage and social dialogue	▪ XX% of employees across all regions entitled to family-related leave by 2030 ▪ Comprehensive Collective Bargaining Framework by 2030
Reduced **workplace safety** and exposure to hazardous environments hinder talent attraction and efficiency, ultimately impacting business outcomes and financial performance due to increased accidents, injuries, and long-term health issues	⚠	▪ Health and Safety Policy	▪ Health and Safety Management System ▪ Safety Turnaround Program ▪ Health and Safety Training ▪ Investment in Safer Equipment/Raw Materials ▪ Mapping of Health and Safety Risks with Root Cause Analysis	▪ S1-14 Health and safety metrics	▪ Reduction of the Lost Time Incident Frequency (LTIF) by XX% year on year. ▪ Decreasing the severity of incidents by XX% annually

Impacts, risks and opportunities	Category	Policy	Actions	Metrics	Target
			▪ Employee Assistance Programs (EAP) ▪ Site Certification (OHSAS 18001)		
Failure to achieve **Diversity, Equity and Inclusion ambitions** and unlock the full potential of people and the organisation may impact wellbeing and may result in efficiency losses and lost business opportunities. In particular, lack of gender equality can be detrimental to workplace culture, resulting in higher employee turnover and difficulties in attracting top talent	⚠ ⊖ P	▪ Human Rights Policy ▪ Diversity, Equity and Inclusion Policy ▪ Global Pay Principles	▪ Diversity, Equity and Inclusion strategy ▪ Women Connect Network & Mentoring ▪ Partnership with Fair Wage Network	▪ S1- 6 Employee characteristics, ▪ S1-9 Diversity metrics ▪ S1-16 Remuneration metrics (Pay gap and Total remuneration)	▪ Zero incidents of discrimination by 2030, ▪ Closing regional gender pay gap Group-wide by 2030, ▪ XX% representation of women in leadership positions (defined as management level and above) across all operational units by 2030
Robust **training and development opportunities** lead to a skills development within the workforce, fostering innovation and efficiency, as well as securing long-term employee success and organisational resilience	✅	▪ Training and Development Policy	▪ Blended learning initiative	▪ S1-13 Training and skills development metrics	▪ Targeted Training and Upskilling by 2027
Forced and child labour can have a significant negative impact on affected communities and the respect of human rights and result in a risk of legal prosecution, fines and reputation damage	⚠ ⊖ P	▪ Human Rights Policy ▪ Code of Conduct	▪ Annual social audits ▪ Grievance mechanism ▪ Whistleblower process ▪ Partnerships with NGOs, surveys and workshops	▪ S1-17 Incidents, complaints and severe human rights impacts	▪ Zero tolerance for forced and child labour

Legend

Category

⊕ - Positive impact
⊖ - Negative impact

A - Actual
P - Potential

✅ Opportunity
⚠ Risk

4.2. Policies and workforce interaction

4.2.1 S1-1 Policies

The Group is committed to fostering a culture of integrity, respect, and accountability. The Group's key policies provide essential frameworks that guide its practices and interactions, reflecting its dedication to a safe, inclusive and respectful workplace for all while upholding the core values and international standards.

The Group considers the interests of key stakeholders through bi-annual surveys, ensuring their perspectives are integrated into all its policies [MDR-P_65e], which are accessible on the Group's website and intranet in several languages [MDR-P_65f].

Code of Conduct

Background	Key content [MDR-P_65a]	Scope/key stakeholders	Accountability
▪ Serves as the foundation for business and work practices, including labour and human rights standards. ▪ Outlines key principles and expectations for workforce, defining how they should conduct themselves in their daily work and interact with individuals both inside and outside of the Group. [MDR-P_65a, 65b].	▪ Addresses key topics outlined in the Human Rights Policy and the relevant international standards mentioned therein [MDR-P_65d], including discrimination, harassment, human rights, fraud and corruption, human trafficking, forced labour, and child labour.	▪ Own workforce, including employees and non-employees [MDR-P_65b].	▪ The implementation is directly overseen by the Group's Chief Compliance Officer [MDR-P_65c].

Human Rights Policy

Background	Key content [MDR-P_65a]	Scope/key stakeholders	Accountability
▪ Underscores unwavering commitment to upholding human rights, with a particular focus on labour rights [S1-1_20a]. By implementing comprehensive measures and practices, the Group strives to create a safe and equitable work environment for all individuals involved in its operations. ▪ Reflects the Group's dedication to ethical standards and reinforces its responsibility to promote dignity and respect throughout the organisation and supply chain.	▪ Addresses critical issues such as human trafficking, minimum wage, forced labour, and child labour, while also promoting Diversity, Equity and Inclusion by eliminating discrimination and harassment. ▪ The Group is committed to respecting all internationally recognised human rights across its global operations and value chain, as outlined in the International Bill of Human Rights, which includes the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the International Covenant on Civil and Political Rights (ICCPR). ▪ The Group also adheres to the International Labour Organisation's (thereafter, ILO) Declaration on Fundamental Principles and Rights at Work [S1-1_22] the Children's Rights and Business Principles (CRBP), and the UN Women's Empowerment Principles [MDR-P_65d].	▪ Entire operations and supply chain, encompassing all employees, agency workers, contractors, consultants, supply chain workers, and upstream and downstream business partners. [MDR-P_65b; S1-1_19].	▪ Overall responsibility rests with the Chief Compliance Officer [MDR-P_65c].

Due diligence framework
The Group follows the frameworks established by the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct to guide the human rights due diligence efforts [S1-1_21]. This framework enables the Group to enhance its capacity to identify both potential and actual human rights impacts associated with its business operations. The Group is dedicated to taking appropriate actions to prevent [S1-1_23], mitigate, and ultimately eliminate these impacts. To ensure effective remediation [S1-1_20c], the Group has established clear processes for addressing any human rights violations that may occur. This includes providing support and compensation to affected individuals and communities, thereby fostering accountability and trust. Stakeholder engagement is a cornerstone of its approach. The Group actively seeks input from a diverse range of stakeholders, including employees [S1-1_20b; MDR-P_65e] customers, and local communities, to better understand their concerns and perspectives [S1-1_20b; MDR-P_65e]. This collaborative dialogue informs the Group's strategies and helps align its practices with the expectations of those it impacts. The Group has established robust **grievance channels** that enable stakeholders to report concerns or violations confidentially, ensuring protection from retaliation and safeguarding their privacy [S1-1_24d]. These channels are designed to promote open communication, allowing individuals to voice their issues without fear. The Group is committed to addressing all grievances promptly and effectively, reinforcing its dedication to a transparent and accountable process. Monitoring is integral to the Group's human right's due diligence process. The Group regularly assesses its policies and practices to ensure compliance with international standards and to identify areas for improvement. This ongoing evaluation allows the Group to adapt its strategies in response to emerging risks and changing circumstances, reinforcing its commitment to uphold human rights in all aspects of its business.

Global Framework Agreement

Background	Key content [MDR-P_65a]	Scope/key stakeholders	Accountability
▪ The Agreement underscores the Group's commitment to fostering fair labour practices and promoting respect for human rights across its global operations. ▪ The Agreement establishes a framework for collaboration with trade unions and other stakeholders, ensuring that workers' rights are upheld and that they have a voice in the workplace. ▪ The Group believes that a strong partnership with labour organisations enhances its ability to create a positive work environment and drives sustainable business success.	▪ It outlines the Group's commitment to adhere to international labour standards and principles, including those set forth by the ILO and the United Nations Guiding Principles (thereafter, UNGP) on Business and Human Rights [MDR-P_65d]. ▪ It emphasises the importance of dialogue and negotiation with trade unions to address workplace issues and promote collective bargaining rights. ▪ The Group engages in regular consultations with labour representatives and provides training on workers' rights and responsibilities, fostering a culture of mutual respect and collaboration. ▪ The Group has established mechanisms for reporting and addressing grievances related to	▪ Own workforce [MDR-P_65b].	▪ The implementation is directly overseen by the Group's Chief Compliance officer [MDR-P_65c].

Background	Key content [MDR-P_65a]	Scope/key stakeholders	Accountability
	labour practices, ensuring that concerns are handled promptly and effectively [MDR-P_65e].		

Health and Safety Policy

Background	Key content [MDR-P_65a]	Scope/key stakeholders	Accountability
▪ This Policy demonstrates the Group's commitment to providing a safe and healthy work environment. ▪ It prohibits any actions or conditions that may compromise health and safety, emphasising a dedication to preventing workplace accidents and promoting well-being [MDR-P_65a]. ▪ The Group believes that a proactive approach to health and safety enhances both employee protection and overall productivity.	▪ Outlines clear expectations for safe practices and aligns with national and international safety standards [MDR-P_65d]. ▪ Established reporting mechanisms allow individuals to confidentially report unsafe conditions without fear of retaliation, ensuring prompt and effective resolution of concerns.	▪ Entire operations and supply chain, encompassing all employees, agency workers, contractors, consultants and supply chain workers [MDR-P_65b].	▪ The implementation is directly overseen by the Group's Chief Operating Officer [MDR-P_65c].

Diversity, Equity and Inclusion Policy

Background	Key content [MDR-P_65a]	Scope/Key stakeholders	Accountability
▪ The Policy reflects the Group's commitment to cultivating a diverse and inclusive work environment, emphasises respect for individual differences and prohibits discrimination based on racial ethnic or social origin, gender identity, age, religion, political opinion or any other characteristic, ensuring that everyone feels valued and empowered though fair access, fair opportunities as well as advancement for all [MDR-P_65a]. ▪ The Group believes that a diverse and inclusive workforce drives creativity, innovation, and overall organisational success.	▪ The Policy clearly outlines expectations for behaviour and provides guidance on fostering inclusivity. ▪ Equity is a guiding principle in the policy, ensuring that access to opportunities and resources is tailored to individual circumstances and needs. ▪ It aligns with the Group's broader commitment to equality as detailed in the Human Rights Policy and adheres to relevant national and international standards, such as the UN Universal Declaration of Human Rights [MDR-P_65d].	▪ The entire operations and supply chain, encompassing all employees, agency workers, contractors, consultants, supply chain workers [MDR-P_65b].	▪ The implementation is directly overseen by the Group's Chief Sustainability Officer [MDR-P_65c].

Background	Key content [MDR-P_65a]	Scope/Key stakeholders	Accountability
	▪ It is supported by comprehensive training programs and established reporting mechanisms for incidents of discrimination or bias, promoting open dialogue and ensuring prompt resolution of concerns.		

Global Pay Principles

Background	Key content [MDR-P_65a]	Scope / Key stakeholders	Accountability
▪ The Group is committed to fostering a fair, inclusive, and transparent compensation environment across all global operations by establishing pay principles that go beyond regulatory requirements to ensure a decent standard of living for employees and their families. ▪ As part of the Group's broader sustainability and workforce equity commitments, it has established Global Pay Principles to ensure that all employees are compensated fairly and equitably, regardless of location, gender or role.	▪ Guarantees that compensation practices are fair, transparent, and aligned with the Group's values of equity and sustainability, eliminating unjustified pay gaps and rewarding all employees equitably, regardless of gender, ethnicity, age, background and local market conditions, through regular pay equity analyses, which are conducted to identify and address disparities. ▪ Compensation is closely tied to individual and team performance. Employees are informed about compensation frameworks. ▪ Incentive programs are designed to support long-term value creation and align with the Group's sustainability and business goals. ▪ The Group adheres to international standards and regulations, such as the ILO's Equal Remuneration Convention and the UNGP on Business and Human Rights, ensuring compliance with all applicable local labour laws and promoting fair and equitable compensation practices [MDR-P_65d].	▪ All employees across global operations and covers base pay, bonuses, benefits and equity programs.	▪ The implementation is directly overseen by both the Chief Financial Officer and the Chief Compliance Officer [MDR-P_65c].

Training and Development Policy

Background	Key content [MDR-P_65a]	Scope/Key stakeholders	Accountability
▪ The Policy reflects the Group's commitment to fostering a culture of continuous learning and development within the organisation. ▪ This policy emphasises the importance of equipping all employees with the necessary skills and knowledge to perform their roles effectively, while also promoting personal and professional growth. ▪ The Group believes that a well-trained workforce enhances productivity, innovation, and overall organisational success.	▪ The Policy clearly outlines expectations for participation in training programs and provides guidance on identifying training needs across various roles. ▪ It aligns with the Group's broader commitment to employee development and adheres to relevant national and international standards, such as the ILO's guidelines on training and development [MDR-P_65d]. ▪ To support this, the Group offers a range of comprehensive training programs, including onboarding, skills development, and leadership training, while also establishing feedback mechanisms to assess the effectiveness of these programs and address any gaps in training.	▪ Own workforce [MDR-P_65b].	▪ It is directly overseen by the Group's Chief Compliance Officer [MDR-P_65c].

Parental Leave Policy

Background	Key content [MDR-P_65b]	Scope/Key stakeholders	Accountability
▪ The Group is committed to supporting employees in balancing their work and family responsibilities.	▪ Provisions for parental leave for employees expecting a child, adopting a child, or becoming a parent through surrogacy. ▪ Employees on parental leave are entitled to return to their same or equivalent position with the same pay, benefits, and working conditions, and will continue to receive their regular salary and benefits, including health insurance and retirement contributions, during their leave. ▪ This policy aligns with relevant international regulations and	▪ All full-time and part-time employees who have been with the Group for at least 12 months [MDR-P_65b].	▪ The implementation is directly overseen by the Group's Chief Compliance Officer [MDR-P_65c].

Background	Key content [MDR-P_65b]	Scope/Key stakeholders	Accountability
	standards, including the ILO's Maternity Protection Convention and the UN Convention on the Rights of the Child, ensuring that employees are supported during parental leave in accordance with global best practices. [MDR-P_65d].		

4.2.2 S1-2 Processes for engaging with own workforce and worker's representatives about impacts

The Group prioritises the engagement and wellbeing of its employees, recognising that an open and transparent engagement process is essential for fostering a positive work environment and ensures that employees' voices are heard. The Group's engagement process is designed to address the needs and concerns of its workforce. The Group pays special attention to vulnerable groups within its workforce, such as migrant workers, women, people with families, as well as those who care for family members, and considers their perspectives in engagement processes [S1-2_28]. The Group strives to create flexible work models and provide training to reduce unconscious biases. In Asialand, the Group is committed to improving working conditions and safety protocols of employees, particularly those in production, due to the higher risks as a result of the social and legal environment [S1-2_28].

The Group engages with employees through various channels and stages [S1-2_27b] to ensure their [S1-2_27a] perspectives inform its decisions and activities [S1-2_27]. These include monthly meetings with sustainability leads at the team level, an annual global and bi-annual employee surveys, and quarterly townhall meetings with senior management, as well as performance reviews conducted at least twice a year and informal ad hoc meetings between managers and employees to discuss cooperation, roles, responsibilities, and challenges [S1-2_27b].

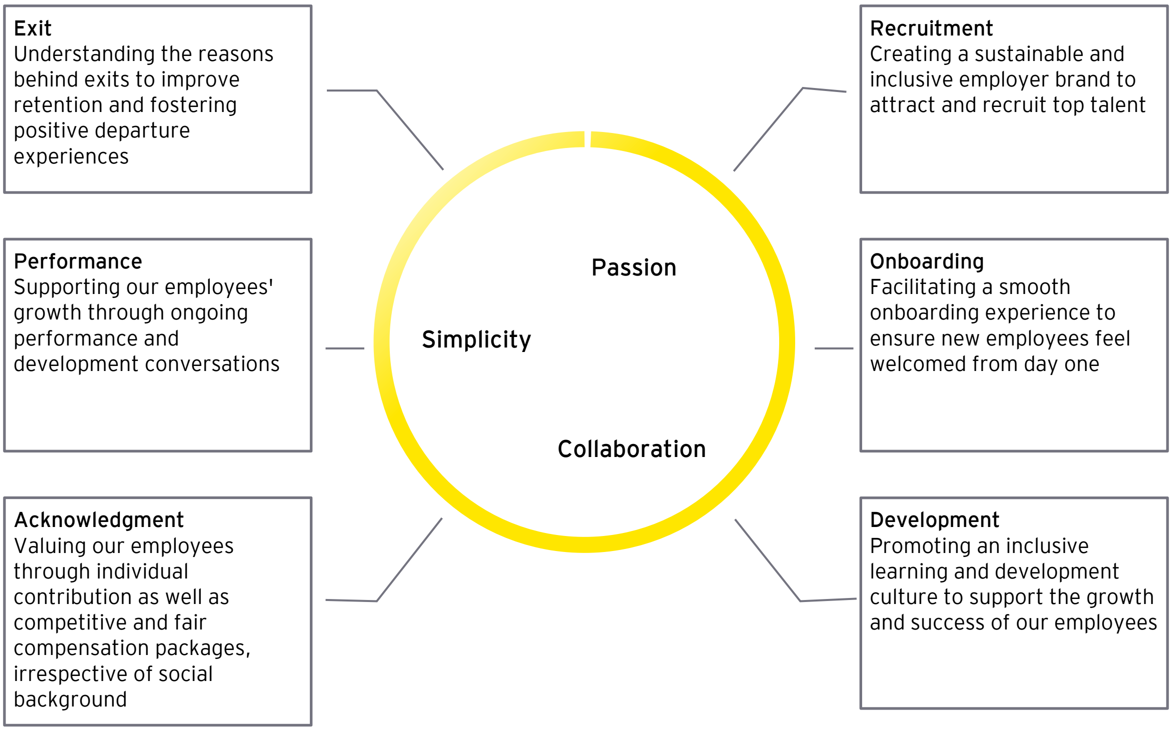
Further, engagement occurs both directly with employees and through their representatives [S1-2_27a]. In regions where employees are represented by legally recognised unions or works councils, the Group establishes a constructive dialogue with these representatives. In areas where such representation is restricted, the Group supports alternative means to facilitate effective communication between employees and management.

Where applicable, the Group has established Global Framework Agreements (GFAs) with workers' representatives [S1-2_27d] to ensure that its engagement processes adhere to the same standards across all regions. These agreements help the Group gain insight into the perspectives of its workforce and ensure that their rights are respected in every step of the employment life cycle (see illustration below).

The effectiveness of engagement processes is measured using several methods, including survey metrics, performance conversations, and the development of action plans based on feedback from surveys and meetings [S1-2_27e]. In 2025, the Group's bi-annual employee engagement survey had a XX% response rate, with XX % of employees expressing pride in working at the Group (please refer to section 5.2).

The CSO holds operational responsibility [S1-2_27c] for ensuring that the employee engagement process runs as designed, and that the results inform the Group's approach. The CSO, along with the Board, reviews the information gathered through the engagement channels to steer the Group towards a more inclusive, healthy, and sustainable workplace.

Improving engagement across the employment life cycle



4.2.3 S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns

The Group has established a comprehensive framework to address and remediate any material negative impacts that may arise from its operations. This includes regular assessments of its practices and the effects on the workforce, allowing for the identification of areas for improvement. The Group utilises feedback mechanisms to evaluate the effectiveness of the remedies provided, ensuring that they meet the needs of its workforce [S1-3_32a].

The Group has implemented several channels in local languages spoken at its premises through which its workforce can raise concerns or express their needs directly to management. The Group encourages all employees to raise concerns directly with their immediate manager or with the HR department in the first instance. This can include employee-related complaints such as dissatisfaction with salary conditions or interpersonal issues.

The implemented channels include [S1-3_32b]:

1. Grievance mechanism where the workforce can submit concerns anonymously through a dedicated online platform or through a hotline, ensuring confidentiality and encouraging open communication. It should be noted that not all channels apply to the workforce but rather to the Group's employees;
2. Whistleblower reporting channels for concerns related to unlawful behavior or breaches of its Code of Ethics, which is applicable to the workforce (please refer to section 5.2.1);
3. Quarterly townhall meetings where employees can voice their concerns and provide feedback directly to leadership;
4. An employee assistance program offering confidential support and counselling services, so that employees are able to discuss workplace issues with trained professionals.

The Group has a formal grievance mechanism in place which is designed to address employee complaints efficiently and fairly [S1-3_32c]. Employees are provided with clear guidelines on how to submit grievances, including timelines for responses and resolutions, during their onboarding process as well as through annual obligatory trainings.

The Group also runs internal campaigns to raise awareness about its grievance mechanisms and the importance of employee feedback. An annual employee survey also helps to assess employee awareness and trust in its grievance mechanisms [S1-3_32d]. Results indicate a high level of awareness among the workforce, with XX% of employees expressing confidence in the processes available to them [S1-3_33].

A dedicated team of XX personnel is assigned to handle grievances, ensuring impartiality and confidentiality throughout the process. The Group maintains a tracking system to monitor all issues raised, their resolutions and follow-up actions taken. Stakeholders, including employee representatives, are engaged and involved in the process of reviewing the effectiveness of the channels and making necessary adjustments. The Group maintains a tracking system to monitor all issues raised, their resolutions and any follow-up actions taken [S1-3_32e].

The Group strictly addresses anti-retaliation measures in its Code of Conduct to protect individuals who utilise these channels for reporting concerns or grievances [S1-3_33]. This commitment extends to all the employees, ensuring they can speak up without fear of negative consequences and fostering a safe and open environment for communication. All reports of retaliation are documented, taken seriously, and investigated promptly. While the Group currently has robust channels in place, it recognises the need for continuous improvement. If any gaps are identified, the Group is committed to addressing them promptly.

4.3. Workforce diversity and compensation: S1-4 Actions, S1-5 Targets and Metrics

4.3.1 S1-6 Employee characteristics, S1-9 Diversity metrics

The Group is committed to transparency of the employee and diversity metrics, specifically focusing on eliminating incidents of discrimination, closing regional gender pay gaps and increasing gender representation at the top management level. The Group also aims to offer a workplace for all people of all ages.

As part of the comprehensive DEI strategy as outlined in its DEI Policy [MDR-T_80a], the Group has set a clear target in 2025 [MDR-T_80d] of achieving zero incidents of discrimination by 2030 [MDR-T_80b, 80e] – embedding inclusion, equal opportunity and a zero-tolerance approach to harassment in every aspect of its workplace culture. This commitment to create an inclusive and respectful workplace applies to all employees and stakeholders [MDR-A_68b; MDR-T_80c].

By 2030, the Group also aims to achieve a minimum of XX% representation of women in leadership positions (defined as management level and above) across all operational units globally [MDR-T_80b, 80c, 80e]. This target has been set in 2025 [MDR-T_80d] and reflects the Group's commitment to gender equity and inclusive growth as per the DEI Policy [MDR-T_80a]. The Group will monitor progress annually and disclose disaggregated data by gender, function and geography to ensure transparency and accountability [MDR-T_80j].

To achieve these goals the Group has implemented several ongoing [MDR-A_68c] initiatives such as:

- The DEI Policy outlines the Group's position on DEI, recruitment and talent development. It defines key responsibilities and guides efforts to achieve DEI ambitions by promoting equal opportunities, including for women in leadership positions, and fostering inclusion while maintaining a zero-tolerance policy for harassment [MDR-A_68a; S1-4_38a]. The Group will also assess the perceptions of fairness within its organisation to identify areas for improvement [S1-4_38d].
- The Women Connect Network & Mentoring initiative, that fosters visibility and career growth for women through storytelling formats like *Leadership Voices*, informal networking events and cross-level mentoring. These formats build trust, promote role models and support leadership development across all functional areas and business units.
- Targeted training programs [MDR-A_68a; S1-4_38a], that raise awareness of DEI issues.

Clear and robust reporting mechanisms are being established for incidents of discrimination or bias to ensure that any concerns related to discrimination or bias are addressed promptly and effectively. Information on incidents of discrimination, including harassment, is provided in section 4.4.3.

The Group will continuously monitor its progress to ensure a workplace free from discrimination by 2030. By integrating these initiatives into the business strategy [S1-4_38d], the Group aims to foster a culture of respect and fairness.

Information on Zero Incidents of Discrimination by 2030 is accessible on the intranet and in employee handbooks in several languages.

Employee headcount by gender [S1-6_50a]:

	Value 2025		Value 2024	
	(Number)	(%)	(Number)	(%)
Male	XXX	XX%	XXX	XX%
Female	XXX	XX%	XXX	XX%
Other	XXX	XX%	XXX	XX%
Not reported	XXX	XX%	XXX	XX%
Total employees	XXX	XX%	XXX	XX%

Employee headcount in countries with at least XX employees and representing at least XX% of the Group's total number of employees, by contract, broken down by gender [S1-6_50a, 50b, 51]:

Country		Number of employees (permanent contract) 2025	Number of employees (temporary contract) 2025	Number of Not-guaranteed -hours employees 2025	Number of full-time employees (FTE) 2025	Number of part-time employees 2025	Number of total employees (headcount) 2025	Number of employees (permanent contract) 2024	Number of employees (temporary contract) 2024	Number of not-guaranteed-hours employees 2024	Number of full-time employees (FTE) 2024	Number of part-time employees 2024	Number of total employees (headcount) 2024
Euroland	**Total**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**
	Female	x	x	x	x	x	x	x	x	x	x	x	x
	Male	x	x	x	x	x	x	x	x	x	x	x	x
	Other	x	x	x	x	x	x	x	x	x	x	x	x
Asialand	**Total**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**
	Female	x	x	x	x	x	x	x	x	x	x	x	x
	Male	x	x	x	x	x	x	x	x	x	x	x	x
	Other	x	x	x	x	x	x	x	x	x	x	x	x
Not reported		**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**	**x**

Employee headcount at top management level* of employees, by gender [S1-9_66a]:

	Value 2025		Value 2024	
	(Number)	(%)	(Number)	(%)
Male	XX	XX%	XX	XX%
Female	XX	XX%	XX	XX%
Other	XX	XX%	XX	XX%
Not reported	XX	XX%	XX	XX%
Total employees	XX	XX%	XX	XX%

* The Group defines "top management" as individuals who are one or two levels below the administrative and supervisory bodies.

Distribution of employees by age group (%) [S1-9_66b]:

	2025	2024
Under 30 years old	XX%	XX%
30-50 years old	XX%	XX%
Over 50 years old	XX%	XX%
Not reported	XX%	XX%
Total employees	XX%	XX%

Employee turnover (headcount) [S1-6_50c]:

	Unit	2025	2024
Employees who left the Group	Number	XX	XX
Employee turnover	%	XX	XX

Methodology

[MDR-M_77a, 77b, 77c]

Employee data is gathered from the local HR system and Group's Human Capital management platforms. All employee figures are reported based on headcount as of December 31, 2025 [S1-6_50d(i), 50d(ii)]. This information can also be found in the consolidated financial statements under "Personnel Expenses and Headcount" [S1-6_50d, 50f].

Gender is determined based on the self-identification provided by each employee, while gender diversity is assessed annually by calculating the percentage of male and female full-time employees (FTEs) relative to the total number of FTEs. The categories "Other" and "Not Reported" may introduce some ambiguity, as some local laws do not recognise more than two genders. The Group defines gender based on the entries recorded for each employee in the HR system.

The **age** of all employees is determined as the age at year-end. Calculations include all employees (full-time and part-time). The data is extracted from the local HR and Payroll systems.

Employment types encompass permanent and temporary contracts, as well as employees with non-guaranteed hours, with positions classified as either full-time or part-time. Permanent employees are those with a permanent contract, while temporary employees are defined as those with a temporary contract. Non-guaranteed hours employees include all individuals who do not have a guarantee of a minimum or fixed number of working hours. A full-time employee is one who works the full number of weekly hours, which may vary by country based on local regulations, and is classified as a full-time equivalent (FTE). In contrast, an employee working less than those hours is classified as a part-time equivalent, calculated proportionally. The calculation of FTEs occurs at the end of each fiscal year and is based on the contractual hours of employees. The reported data on employees are reflected in the consolidated financial statements under "Personnel Expenses and Headcount".

Employee turnover is determined by dividing the number of employees who left the organisation during the reporting period by the total number of employees at the end of the year, expressed in terms of FTEs [S1-6_16].

4.3.2 S1-7 Characteristics of non-employees in the Group's own workforce

A portion of the Group's workforce is made up of non-employees, including individuals employed by third-party contractors and self-employed professionals [S1-7_55c]. The latter account for XX% of the non-employee workforce, representing a total of XX individuals [S1-7_50a]. These individuals support a range of functions, including logistics, facility services and specialized consulting. XX% of non-employees are supplied by agencies that engage in employment activities [S1-7_50a] primarily filling in for temporarily absent employees.

The data presented below is reported in FTEs [S1-7_50b(i)]. The figures reflect the average across the 2025 reporting period [S1-7_50b(ii)]:

Reporting Year	Number of Non-Employees (FTE)	Of which are self-employed people	Of which are people provided by undertakings primarily engaged in employment activities	Reporting Basis
2025	XX [S1-7_55a]	XX [S1-7_55a]	XX [S1-7_55a]	Average (FTE)

Methodology

[S1-7_55b; MDR-M_77a, 77b, 77c]

The figures presented are estimations based on the analysis of the workforce composition at the Group. These estimates reflect the proportion of non-employees, including those supplied by agencies and their roles within the Group. Exact numbers are not provided due to variability in workforce dynamics and the nature of temporary employment arrangements [S1-7_57].

FTE is calculated by dividing the total number of hours worked by all employees, including both full-time and part-time staff, by the number of hours that define a full-time work schedule (40-hour work week).

Commentary on the ESRS Sustainability Disclosures

In 2024 the Group chose to begin reporting on characteristics of non-employees in the subsequent year, as per the ESRS phased-in provision. Therefore, prior year information in accordance with ESRS S1-7 is not disclosed in this illustrative sustainability statement.

4.3.3 S1-16 Remuneration metrics (Pay gap and Total remuneration)

Global Gender Pay Gap

The Group upholds the principle of fair and equitable remuneration for every employee. In 2025, its global gender pay gap was XX% in favour of men [S1-16_97a]. This figure represents the average difference in pay between male and female employees across the Group. This gap can be broken down into two components: the explained and the unexplained pay gap.

The explained pay gap encompasses differences in pay attributable to objective factors such as job role, education, work experience, responsibilities, and geography. In contrast, the unexplained pay gap represents the portion of the pay gap that these factors cannot explain. Global gender pay gap primarily reflects the workforce profile of the Group and the industry in which it operates [S1-16_97c].

Regional gender pay gap

The Group recognises that the gender pay gap varies across different regions. In 2025, the gender pay gap in its European operations was XX% in favour of men, while in its Asian operations, it was XX% in favour of men [S1-16_97a]. This disparity is largely driven by regional workforce structures and local market conditions [S1-16_97c].

The Group's goal is to ensure equal pay for equal work (or work of equal value) between female and male employees. To achieve this, the Group has developed a methodology for assessing equal pay for equal work. This approach compares pay for female and male employees in similar roles within the same country and is aligned with the requirements of the EU Pay Transparency Directive [S1-16_97c].

All operating companies globally are dedicated to delivering, monitoring, and evaluating local action plans aimed at closing identified pay disparities between female and male employees. These efforts are embedded in reward strategies, processes, and initiatives.

Furthermore, the Group has committed to closing regional gender pay gaps across all employees by 2030 [MDR-T_80c,80e]. This target, outlined in the Human Rights Policy and Global Pay Principles [MDR-T_80a], is a cornerstone of a broader DEI strategy, which promotes equal opportunity and a zero-tolerance policy for discrimination or harassment. Since setting this target in 2024, the Group has made measurable progress, reducing the gap by XX% in Europe and XX% in Asia in 2025 [MDR-T_80j]. Nonetheless, regional disparities remain [MDR-T_80d].

The target was set based on a thorough analysis of employee needs and industry benchmarks, ensuring that the Group's policies align with best practices in gender equality and equal remuneration. The Group conducts an annual [MDR-A_68c] wage benchmarking exercise against both minimum and living wage standards and incorporates feedback from annual employee surveys [MDR-T_80h; MDR-A_68c] to assess any gender pay differences, helping the Group identify and address any systemic gaps [MDR-T_80f].

To further support this goal, the Group has partnered with the Fair Wage Network to align its practices with global best-in-class standards. These initiatives are designed not only to meet the Group's 2030 goal but also to foster a culture of transparency, accountability and respect throughout the workforce [MDR-A_68b].

Remuneration ratio

The Group's total annual remuneration ratio [S1-16_97b] is calculated by taking the highest-paid individual divided by the median annual total remuneration of all other employees (excluding the highest-paid individual) [S1-16_97c]. This metric helps to explain the level of remuneration inequality within the Group and whether wide pay disparities exist.

Metric	2025	2024
Global Gender Pay Gap	xx % in favour of men	xx % in favour of men
Gender Pay Gap EU	xx % in favour of men	xx % in favour of men
Gender Pay Gap Asia	xx % in favour of men	xx % in favour of men
Total Remuneration Ratio	xx%	xx%

Methodology

[MDR-M_77a, 77b, 77c]

Gender Pay Gap: Calculations include all employees (full-time and part-time) employed on 31 December. Due to the nature of the data, the Group distinguishes between male and female exclusively.

Gender pay gap = $\left(\frac{\text{Average gross hourly pay level of male employees} - \text{Average gross hourly pay level of female employees}}{\text{Average gross hourly pay level of male employees}}\right) \times 100.$

The data is extracted from the HR system and Payroll system. General payroll processes ensure a high level of quality in the data.

Annual total remuneration ratio: Calculations include all employees (full-time and part-time). The annual total remuneration includes all fixed salary elements including base salary, pension and other benefits, and bonuses. The annual total remuneration ratio of the highest paid individual includes the annual total remuneration for the undertaking's highest paid individual.

$$\textbf{Median employee annual total remuneration (excl. highest paid individual)} = \frac{\text{Annual total remuneration of all employees}}{\text{Annual total remuneration ratio of highest paid individual}}$$

The data is extracted from the HR system and Payroll system. For further information on remuneration, the Annual Remuneration Report is available in several languages.

4.4. Collective bargaining, wage adequacy and human rights: S1-4 Actions, S1-5 Targets and Metrics

4.4.1 S1-8 Collective bargaining coverage and social dialogue

The Group is committed to ensuring fair and secure employment practices and advocating for clear and equitable labour regulations in all its markets. The Group respects employees' rights to freedom of association and collective bargaining, as outlined in its Human Rights Policy and Global Framework Agreement. Participation in unions or workers' councils is voluntary and protected from discrimination, harassment, intimidation, retaliation or violence. In countries where such rights are restricted by law, the Group will not hinder employees from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment.

Collective bargaining agreements are negotiated regularly at a local level in each market, complying with all relevant national laws and regulations regarding labour rights. To ensure the Group stays abreast of changing requirements, each of its markets continuously monitors regulations relevant to its operations.

Collective bargaining agreements are negotiated in good faith, with employee representatives being consulted on changes to working conditions. The Group aims to ensure its employees feel consulted and well-informed about business activities and developments and is committed to upholding the principles of ILO convention No. 87 on "Freedom of Association and Protection of the Right to Organise" and ILO Convention No. 98 on the "Right to Organise and Collective Bargaining".

In 2025, XX% of the Group's global workforce was covered by collective bargaining agreements [S1-8_60a], reflecting a XX% increase in employee participation in collective bargaining processes at the Group level compared to the previous year, with specific increases of XX% at Euroland and XX% at Asialand [MDR-T_80j].

Coverage varies by region, and the Group continues to monitor participation levels and negotiation progress across all locations. The Group annually monitors the number of employees covered by collective bargaining agreements in every market where the Group operates.

The Comprehensive Collective Bargaining Framework, established in 2023 [MDR-T_80d], is designed to establish a long-term approach [MDR-T_80e] to collective bargaining that fosters sustainable labour relations, with a target of 100% coverage by 2030. It promotes fair wages, benefits and working conditions for all employees while promoting a collaborative partnership between management and labour representatives [MDR-T_80c]. The framework is reviewed every five years and informed by employee feedback gathered through periodic questionnaires [MDR-T_80h].

To support implementation of its labour rights commitments, the Group has established a whistleblower process [MDR-A_68a; S1-4_38a] that ensures its employees [MDR-A_68b] can safely and confidentially raise concerns at any given time [MDR-A_68c]. This anonymous whistleblower reporting channel is accessible to all employees, enabling them to report any misconduct – be it illegal activities or breaches of internal policies – without the fear of retaliation. By providing a secure and transparent channel for feedback, the Group fosters a culture of accountability and continuous improvement. For a detailed overview of the Group's whistleblower systems, please refer to section 5.4.2.

Additionally, the Group is committed to strengthening the employee voice [MDR-A_68b] and representation by expanding Social Dialogue coverage to XX% of countries in which the Group operates by 2030 [MDR-T_80b, 80e]. This target reflects its belief in inclusive and transparent communication between management and employees as a foundation for a resilient and equitable workplace [MDR-T_80c]. The Group's commitment is embedded in its Code of Conduct, which ensures that all employees have a safe and confidential channel to voice concerns [MDR-T_80a]. When the target was set in 2024, Social Dialogue mechanisms were active in XX% of countries, increasing to XX% in 2025 [MDR-T_80j]. However, structured dialogue remains more limited in Asialand. [MDR-T_80d].

The target was informed by a benchmarking exercise done against peer companies and industry best practices [MDR-T_80f]. The Group incorporated insights from employee feedback and regional consultations [MDR-T_80h], which emphasised the importance of participatory governance in fostering trust and engagement.

[S1-8_63a; S1-8_AR_70; S1-8_AR_69]

	Collective bargaining coverage		Social dialogue
Coverage Rate	**Employees – EEA (for countries with >50 employees representing >10% total empl.)**	**Employees – non-EEA (estimate for regions with >50 empl. Representing >10% total empl.)**	**Workplace representation (EEA only) (for countries with >50 empl. Representing >10% total empl.)**
0-19%		Asialand	
20-39%			
40-59%	Euroland		Euroland
60-79%			
80-100%			

In the European Economic Area (the EEA), the Group has XX collective bargaining agreements in place. The overall percentage of employees covered by collective bargaining agreements in Euroland, where the Group has significant employment, is illustrated below, along with the percentage of its employees covered by such agreements outside the EEA [S1-8_60b, 60c]:

Country	Region	Percentage of employees covered (2025)
Euroland	Europe (EEA)	%
Asialand	Asia (outside EEA)	%

Outside the EEA, the Group is actively working to enhance data collection and reporting on this key indicator to provide more granular and insightful information in the future.

The Group currently does not have any agreements in place for employee representation through the European Works Council (EWC), Societas Europaea (SE) Works Council, or Societas Cooperativa Europaea (SCE) Works Council [S1-8_63b].

Beyond formal agreements, the Group actively fosters platforms that facilitate social dialogue between employees and management. These include regular council meetings, townhall meetings, annual surveys and individual performance development interviews that are conducted twice a year. Informal and ad hoc meetings at site or national level further support open communication on roles, responsibilities and daily challenges.

Methodology

[MDR-M_77a, 77b, 77c]

The percentage regarding social dialogue in the table above is calculated as the share of employees covered by collective agreements, as the Group does not have access to information about whether employees are members of a trade union. Trade union membership information is specifically protected data under the General Data Protection Regulation (GDPR).

Percentage of employees covered by worker's representatives within the EEA is calculated as total number of employees working in establishments, with worker's representatives divided by total number of employees and multiplied by 100.

Significant employment is defined as at least 50 employees in a consolidated entity, and where the total number of employees in a country represents at least 10% of the total consolidated number of employees

Commentary on the ESRS sustainability disclosures

In 2024 the Group began reporting on collective bargaining and social dialogue in the subsequent year, as per the ESRS phased-in provision. Therefore, prior year information for ESRS S1-8 is not disclosed in full in this illustrative sustainability statement.

4.4.2 S1-10 Adequate wages

The Group is committed to ensuring that all its employees across Europe and Asia receive adequate wages, ensuring fair and equitable compensation across all regions. Historically, the topic of adequate wages has not been managed centrally by the global functions. However, its performance indicates that the Group did not experience cases of employees being paid below the minimum wage. Since 2024, the Group tracks wage data centrally and works with all markets to ensure its global pay principles are applied consistently and fairly.

To attract and retain talent, the Group offers competitive salaries and regularly reviews local payment practices against criteria aligned with the ESRS framework. Paying minimum wage is enshrined in the Human Rights Policy. The Group's commitment to paying an adequate wage that meets the needs of workers and their families is reflected in its Global Pay Principles as well as in its DEI Policy. These principles aim to minimise financial distress, perpetuation of poverty and adverse effects on the overall economy especially in low income countries, such as Asialand [MDR-T_80a].

In 2025, the Group conducted an annual comprehensive review of wage levels across all its markets. This assessment benchmarked the lowest wages paid against national minimum wages thresholds, where available. In countries without a defined minimum wage, external minimum wage benchmarks were used for reference only. As in 2024, the findings confirmed that the Group is compensating all employees at or above the applicable minimum wage [S1-10_69; MDR-T_80f].

Based on these findings, the Group has set a target to ensure XX% payment above living wages for all employees (both within Europe and Asia) by 2030 [MDR-T_80b, 80c, 80d, 80e]. The Group believes this fosters a positive work environment as well as productivity and employee satisfaction. The Group will continue to monitor wage data annually.

As a reference for a living wage definition, the Group will use the approach of the International Labor Organisation (ILO). Its partnership with the Fair Wage Network will support this data analysis and progress tracking towards its target [MDR-T_80f]. If any areas of concern are identified from the Group's data review, they are reported to the Chief Compliance Officer, and corrective action plans will be developed to address any issues. [MDR-T_80j].

Employee Feedback

To gather employee perspectives on the adequacy of wages throughout its global workforce, the Group introduced a new question in its annual employee survey in 2025, asking whether employees feel fairly compensated for their work. The results exceeded the Glint Global Benchmark by XX percentage points, indicating a positive perception of the Group's compensation practices. This question will remain part of the annual survey going forward [MDR-T_80f]. Employees can also access the pay range that is relevant to their role in a global internal payroll tool.

Methodology

[MDR-M_77a, 77b, 77c]

The Group has partnered with recognised specialists in the field, such as The Fair Wage Network, to undertake extensive reviews of employees' compensation against minimum wage benchmarks. The annual analysis, carried out using the Anker Methodology, shows that the Group has no employees globally below any applicable minimum wage. This analysis was based on base salaries alone and did not include compensation items such as variable pay, allowances, or other benefits.

4.4.3 S1-17 Incidents, complaints and severe human rights impacts

The Group upholds a zero tolerance [MDR-T_80b] for any kind of forced and child labour across all its operations [MDR-T_80c]. This unwavering commitment is enshrined in its Human Rights Policy and Code of Conduct [MDR-T_80a], reflecting the zero-tolerance stance against any form of exploitation, including human trafficking. This ongoing commitment [MDR-T_80e] was established in 2024 [MDR-T_80d] and the Group has taken decisive action to strengthen its practices, prevent forced and child labour, and ensure strict compliance with international labour standards. Similar to 2024, no instances of forced or child labour were identified in 2025 [MDR-T_80j].

The Group's target is supported by an exhaustive assessment of its supply chain and industry benchmarks, ensuring that its policies not only meet, but exceed best practices in human rights [MDR-T_80f]. The Group has engaged with stakeholders by conducting surveys and interviews with employees and suppliers to gather insights on forced and child labour. Workshops and focus groups with local community organisations facilitated open dialogue and the sharing of recommendations. Partnerships with NGOs specialising in labour rights provided valuable resources and expertise. Through regular communication, including newsletters and community meetings, the Group fosters transparency and encourages ongoing feedback, reinforcing its commitment to eradicating forced and child labour [MDR-T_80h]

To achieve this ambitious goal, the Group has implemented robust ongoing [MDR-A_68c] initiatives, including a Whistleblower process and comprehensive Grievance Mechanism [MDR-A_68a] that empowers employees and community members to confidentially report any concerns related to forced and child labour, without fear of retaliation. Furthermore, the Group conducts rigorous annual social audits [MDR-A_68a] to monitor compliance with its policies and swiftly addresses any violations. These initiatives underscore the Group's unwavering determination to eliminate forced and child labour from its operations and supply chain [MDR-A_68b]. By integrating these initiatives into its core strategy, the Group aims to empower its employees and ensure a responsible and ethical workplace that prioritise the wellbeing of children and communities.

[S1-17_103a, 103b, 103c, 104a, 104b]

Incidents, complaints and severe human rights impacts	Unit	2025	2024
Incidents of discrimination, including harassment	Number	x	X
Complaints filed through channels for people in own workforce to raise concerns	Number	x	X
Complaints filed to National Contact Points for OECD Multinational Enterprises	Number	x	X
Fines, penalties and compensation for damages resulting from the incidents & complaints	EUR	x	X
Confirmed severe human rights incidents connected to own workforce	Number	-	-

Incidents, complaints and severe human rights impacts	Unit	2025	2024
Violations of UNGPs and OECD Guidelines for Multinational Enterprises	Number	-	-
Fines, penalties and compensation for damages related to confirmed severe human rights incidents	EUR	-	-

Fines, penalties, and compensation for damages refer to any financial payments made in relation to confirmed cases. They are reflected in the Group's consolidated financial statements under the line item "Other expenses". In total, XX complaints were filed through all available channels (compared to XX complaints in 2024); however, none of the cases had been confirmed by the time this sustainability statement was published. In fiscal year 2025, as in 2024, no payments were made for damages resulting from incidents, complaints, or severe human rights violations [S1-17_103c, 104b].

Methodology

[MDR-M_77a, 77b, 77c]

Incidents, complaints, and severe human rights impacts include all occurrences documented through the internal grievance mechanism and Whistleblower Reporting channels [S1-17_03] as well as those reported to National Contact Points for OECD Multinational Enterprises [S1-17_04]. Incidents of discrimination encompass all verified cases of harassment, sexual harassment, discrimination, and retaliation involving the Group's employees.

All human rights incidents are assessed annually based on their scale, scope, and severity, with the potential for remediation evaluated on a case-by-case basis. Confirmed severe human rights incidents are considered violations of established human rights frameworks, whereas incidents that are still under investigation are not classified as confirmed.

4.5. Workplace health, integration and skills enhancement: S1-4 Actions, S1-5 Targets and Metrics

4.5.1 S1-14 Health and safety metrics

The Group remains firmly committed to ensuring that every employee, contractor and temporary worker returns home safely each day. While the Group has made significant progress in reducing the severity of incidents, safety risks remain inherent to its operations. Maintaining a safe working environment depends on the vigilance and dedication of everyone involved.

The Health and Safety Management system, covering XX% of the Group's workforce - including both employees (XX%) and non-employees (XX%) [S1-14_88a] - is designed to address the high-risk activities within its operations and is aligned with recognised standards such as ISO 14001. The system is externally validated through annual audits and continuously updated to reflect emerging risks and best practices. The Group continuously monitors and updates its safety protocols to address emerging risks and to maintain a safe working environment. The Group empowers its workforce to stop and speak up if work cannot be executed safely or if it is not possible to adhere to the stringent safety standards. This proactive approach is fundamental to the overarching principle of prioritising safety above all else.

Fatalities and serious injuries

In 2025, the Group reported zero fatalities due to work-related injuries and work-related ill health. This includes data for other workers on its sites, such as value chain workers working on the Group's site [S1-14_88b].

Additionally, the Group recorded a total of XX work-related accidents [S1-14_88c] in 2025, resulting in an accident rate of XX per 1,000 members of the workforce [S1-14_88c] (2024: XX per 1,000). The types of work-related ill health incidents reported in 2025 included respiratory issues due to chemical exposure, musculoskeletal disorders from manual handling, and hearing loss from prolonged exposure to high noise levels. The Group recorded XX cases of work-related ill health [S1-14_88b, 88d], and the Group has implemented targeted interventions to address these specific health risks.

In 2025, the Group experienced a total of XX days lost due to work-related injuries and ill health [S1-14_88e]. This includes days lost from both work-related accidents and ill health incidents. The Group is committed to reducing this number through continuous improvement of its health and safety management system and proactive measures to prevent incidents.

Work-related accidents	2025	2024
% Employees Covered by Health and Safety Management Systems	XX%	XX%
Number of Fatalities - Own Workforce	XX	XX
Number of Fatalities - Non-Employees	XX	XX
Number of Recordable Work-Related Accidents – Own Workforce	XX	XX
Rate of Work-Related Accidents – Own Workforce	XX%	XX%
Number of Recordable Work-Related Ill Health Days – Own Workforce	XX	XX
Number of Lost Time Incidents - Own Workforce	XX	XX
Rate of Work-Related Accidents – Non-Employees	XX	XX
Lost Time Incident Frequency	XX	XX

Of the recorded work-related accidents in 2025, XX occurred in logistics and distribution (2024: YY), XX in commerce (2024: YY), XX in production (2024: YY), and XX in other functions (2024: YY). A Safety Turnaround Program has been implemented as part of the Group's Health and Safety Management system to decrease recordable injuries among employees and temporary workers. This is achieved through health and safety training, enhancing safety protocols and awareness, and implementing Employee Assistance Programs (EAP). Additionally, investments in safer equipment and raw materials, mapping health and safety risks with root cause analyses, and Site Certification (OHSAS 18001) [MDR-A_68a; S1-4_38a] are leading to a safer working environment across all areas of operations.

The Group is dedicated to creating a safe environment for everyone working on its premises [MDR-T_80c] and has detailed this commitment in the Health and Safety policy [MDR-T_80a]. In 2025, the Group established an action plan aimed at reducing work-related incidents related to health and safety by at least by XX% by 2030 [MDR-T_80b, 80e]. To achieve this, starting in 2025 [MDR-T_80d], the Group's target is to reduce the Lost Time Incident Frequency (LTIF) by XX% year on year, while also focusing on decreasing the severity of incidents by XX% annually [MDR-T_80b].

Methodology

[MDR-M_77a, 77b, 77c]

Fatalities, if any, are included in the number and rate of recordable injuries. Number of recordable work-related incidents includes all incidents regardless of absence.

Recordable work-related incidents include the number of fatalities (work-related incidents where the person lost their life), number of permanent disabilities due to injuries, lost-time incidents (LTI: injuries that result in the injured person being unable to work for one or more days), restricted work incidents (RWI: injuries where the injured person is able to perform only restricted work for one or more days after the incident) and medical treatment incidents (MTI: incidents where the injured person receives medical treatment provided by a licensed health professional).

The number of recordable work-related incidents covers own employees, whereas the number of fatalities covers both own employees and contractors. Recordable work-related incident rate is calculated as the number of incidents per 1 million hours worked and covers own employees. The rate of work-related accidents is calculated as number of recordable work-related accidents per 1 million work hours. Number of lost time incidents is calculated as incidents resulting in absence from work for one day or more and the frequency is calculated per 1 million working hours.

4.5.2 S1-15 Work-life balance metrics

The Group recognises that achieving a healthy work-life balance is essential for the well-being of its employees and the overall success of its organisation. The Group is committed to fostering an environment that supports its employees in balancing their professional responsibilities with their personal lives, particularly when it comes to family-related needs. All employees across all locations are entitled to sick leave, holiday leave, and parental leave.

The Group is dedicated to ensuring that XX% [MDR-T_80b] of its employees across all regions [MDR-T_80c] are entitled to family-related leave by 2030 [MDR-T_80e]. This commitment is outlined in the Human Rights Policy and supported by the Global Framework Agreements and Parental Leave Policy [MDR-T_80a]. The target was set based on a thorough analysis of employee needs and industry benchmarks, ensuring that the Group's policies align with best practices in family support.

The Group conducts bi-annual employee surveys to gather feedback on material topics (e.g. work-life balance), family-related leave policies as well as identification of areas for potential improvement [MDR-A_68a]. Results are reviewed by senior management. Individual departments and managers are responsible for setting up and managing action plans to address challenges identified. The Group considered the feedback from the employee surveys and focus groups [MDR-T_80h], which highlighted the importance of family-related leave in promoting work-life balance [MDR-T_80f].

To achieve this target, the Group has implemented an ongoing [MDR-A_68c] comprehensive approach that includes its Flexible Work Initiative, which allows employees to adjust their work schedules to accommodate family needs. Additionally, the Group is piloting a Parent-Child office at its headquarters, creating a supportive environment for working parents and their children. These initiatives demonstrate the Group's commitment to enhancing family-related leave provisions and supporting its employees [MDR-A_68b] in balancing their professional and family responsibilities [MDR-A_68a].

These ongoing [MDR-A_68c] initiatives will continually evolve as the Group assesses and enhances its practices to uphold the highest standards of family support. By integrating them into its strategy, the Group aims to empower its employees [MDR-A_68b] and ensure a more inclusive workplace that recognises the importance of family-related leave for all employees.

Since establishing the target in 2024, when XX% [MDR-T_80d] of employees in Euroland were entitled to family-related leave (including maternity leave, paternity leave, parental leave and carer's leave), the Group has made progress of XX% in 2025 [S1-15_93a, 94; MDR-T_80j]. The Group encourages employees to utilise their family-related leave entitlements.

Family-related leave by gender* [S1-15_93a, 93b]	2025	2024
% Employees entitled to take family-related leave	XX%	XX%
% Entitled employees that took family-related leave	XX%	XX%
Female	XX	XX
Male	XX	XX
Other	XX	XX

* Family-related leave metrics are available in the local HR system, based on specific leave codes.

Methodology

[MDR-M_77a, 77b, 77c]

Calculating family-related leave at the Group involves assessing the percentage of employees entitled to maternity, paternity, parental, and carer's leave using data from the local HR system. The Group tracks the utilisation of this leave with a focus on gender equity. Annual employee surveys gather feedback on work-life balance, which is reviewed by senior management, with a view to enhancing existing policies.

4.5.3 S1-13 Training and skills development metrics

In 2025, the Group continued to invest in workforce development through structured training programs [S1-13_83a]. On average, each member of own workforce completed approximately XX hours of formal training [S1-13_83b], totalling over XX learning hours by its employees and XX by non-employees [S1-13_83b] across the Group via a formal course catalogue. This represents an increase of XX hours compared to 2024, highlighting its commitment to continuous learning and development.

Since 2025 [MDR-T_80d], the Group has pursued a strategic approach to upskilling, aiming to provide its workforce [MDR-T_80c] with tailored development and upskilling, ensuring that everyone [MDR-T_80b] receives targeted training opportunities by 2027 [MDR-T_80e; MDR-A_68c]. This commitment is outlined in the Group's Training and Development Policy [MDR-T_80a] and supported by the Blended Learning Initiative [MDR-A_68a], which combines online and in-person training methods for its workforce [MDR-A_68b; MDR-T_80f].

The Group's training programs aim to raise awareness and foster continuous improvement. The Group offers a variety of courses, including mandatory sessions on health and safety, sexual harassment, unconscious bias and creating a diverse workplace. Additionally, the Group provides tailored training for specific roles, such as inclusive leadership for people leaders and courses focused on women in management.

The Group's training strategy is based on a thorough analysis of employee needs, informed by assessments, performance reviews, and feedback [MDR-T_80h]. The Group regularly evaluates its programs to gather insights and identify areas for improvement [MDR-T_80j]. By integrating these initiatives into its overall strategy, the Group aims to build a skilled workforce ready to meet the challenges of a changing industry.

The Group believes in a blended approach to learning, combining on-the-job learning, informal peer/social learning and formal/structured training. To be a leading player, the Group recognises a need to enable new perspectives and develop future leadership capabilities and mindsets. The Group's commitment to training and skills development ensures long-term employee success and organisational resilience.

Employee Participation in Training and Skills Development*

Gender	Participation in % in regular performance and career development reviews [S1-13_83a]	Average number of training hours per employee [S1-13_83b]
Male	XX%	XX h
Female	XX%	XX h
Other	XX%	XX h

* Based on data gathered from the Group's Learning Management system, local HR system and Workday Learning [MDR-M_77a, 77b]

Methodology

[MDR-M_77a, 77b, 77c]

The methodology for assessing training and skills development at the Group in 2025 involved measuring the formal training delivered through internal programs. This included tracking the average hours of formal learning completed by employees and non-employees, as well as the total learning hours recorded through the formal course catalogue. Data is sourced from multiple tools across Group entities, potentially leading to discrepancies and inaccuracies.

Commentary on the ESRS sustainability disclosures

In 2024, the Group chose, as per the ESRS phased-in provision, to begin to report on training and skills development in the subsequent year. Therefore, prior year information for ESRS S1-13 is not disclosed in this illustrative sustainability statement.

5. Governance information – Business conduct

5.1. SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

At the Group, responsible and ethical business conduct is a cornerstone of corporate culture. The Group actively collaborates with partners across its value chain to identify and mitigate risks such as corruption and bribery. In line with the Group's commitment to sustainability and transparency, the Group also engages in policy dialogue to advocate for the interests of breweries. The Group's goal is to help shape a regulatory environment that supports sustainable brewing practices and fosters long-term value for people and planet.

The table below shows the IROs identified for *G1 Business conduct* and a summary of the related policies, actions, metrics and targets as further described in this section.

Impacts, risks and opportunities	Category	Policy	Actions	Metrics	Target
The Group's ethical values - transparency, accountability and integrity - shape a **corporate culture** that fosters inclusivity and long-term business value. This strengthens employees' sense of belonging, enhances stakeholder trust and supports sustainable business outcomes	⊕ P	▪ Code of Ethics	▪ Employee engagement programs ▪ Diversity, Equity and Inclusion Strategy ▪ Training and development ▪ Initiatives to support SDG 8	▪ Please refer to section 4.1 for Diversity, Equity and Inclusion metrics	▪ Please refer to section 4.1 for Diversity, Equity and Inclusion targets
If anonymity for whistleblowers cannot be guaranteed and whistleblowers are not protected from retaliation, this will have a negative impact on the Group. It may cause negative legal, financial, or health effects on the individual, and may silence individuals from reporting issues regarding unethical behaviour, counterfeit or illicit trade, or harassment in the future	⚠ ⊖ P	▪ Code of Ethics ▪ Whistleblower Policy	▪ Whistleblower reporting channels	▪ Reported cases of retaliation against whistleblowers	▪ Maintain no reported cases of retaliation against whistleblowers
Unclear practices in terms of **lobbying** or **political** financial **contributions** may lead to public backlash and critique (e.g., giving rise to accusations that the Group is slowing down progress to achieve climate goals; or the Group could be open to accusations of trying to exercise influence in setting the legal drinking age, or creating unfavourable market conditions for other companies), which could damage brand reputation and affect sales	⚠ ⊖ P	▪ Code of Ethics	▪ Whistleblower reporting channels	▪ G1-5 Political Influence and lobbying activities	▪ Continue to maintain zero political contributions (direct and indirect)
Failure to develop and maintain processes that prevent unethical engagement with **suppliers** (e.g., delayed payments, unfair dealings, and preferential treatment) through the Group's policies in the upstream & downstream value chain may affect suppliers' cash flow and result in negative impacts on people, including human and labour rights, as well as on the environment	⚠ ⊖ P	▪ Code of Ethics ▪ Whistleblower policy	▪ Risk assessments ▪ Training programs ▪ Third party screening ▪ Internal Audits	▪ G1-6 Payment practices	▪ XX% supplier invoices to be paid within agreed terms ▪ Please refer to section 4.5.3 for training and skills development targets

Impacts, risks and opportunities	Category	Policy	Actions	Metrics	Target
Failure to prevent the use of **bribes** or other illegal payments, including through third-party intermediaries, for the purpose of obtaining or retaining a business advantage, may distort fair market competition and lead to legal prosecution, fines and reputational damage	⚠ ⊖ P	▪ Anti-corruption and anti-bribery policy	▪ Training on business conduct ▪ Risk assessments ▪ Internal audits	▪ G1-4 Incidents of corruption or bribery ▪ Incidents of corruption and bribery (reports, investigations and corrective actions) ▪ Number and type of functions of risk ▪ Completion rate of trainings	▪ Zero material convictions for violations of anti-corruption and anti-bribery laws ▪ Please refer to section 4.5.3 for training and skills development targets

Legend

Category

⊕ - Positive impact
⊖ - Negative impact

A - Actual
P - Potential

✅ Opportunity

⚠ Risk

5.2. G1-1 Corporate culture and business conduct policies

Business Conduct Policies

The Group is committed to maintaining very high standards of business conduct and corporate culture. The Group's business conduct policies are designed to ensure ethical behaviour, compliance with laws and regulations, and the promotion of a positive corporate culture. To manage its material IROs, several policies are in place that include:

Code of Ethics [G1-1_9]

Background	Key content [MDR-P_65a]	Scope/key stakeholders	Accountability
▪ The Code of Ethics outlines the principles and standards that guide the Group's business practices. It reflects the commitment to integrity, fairness, transparency, and respect for human rights across all operations. The policy is aligned with international frameworks such as the UN Global Compact and the OECD Guidelines for Multinational Enterprises	▪ The Code sets expectations for ethical behaviour, including anti-corruption, anti-bribery, and fair competition. It includes mechanisms for identifying, reporting, and investigating misconduct, and provides protection for whistleblowers in line with Directive (EU) 2019/1937 ▪ It is supported by mandatory training for all employees and targeted sessions for high-risk functions ▪ The Code is available in several languages on the intranet and external website [MDR-P_65f].	▪ Applies to all employees, contractors, consultants, and third-party partners across operations and the supply chain [MDR-P_65b]. ▪ Stakeholder input is gathered through regular engagement and materiality assessments to ensure the policy remains relevant and inclusive [MDR-P_65e].	▪ Oversight is provided by the Chief Compliance Officer (CCO) [MDR-P_65c]. ▪ The policy is reviewed annually by the Ethics & Compliance Committee and updated as needed to reflect regulatory changes and stakeholder expectations

Anti-corruption and anti-bribery policy [G1-1_10a]

Background	Key content [MDR-P_65a]	Scope / Key stakeholders	Accountability
▪ This policy prohibits all forms of corruption and bribery, ensuring that all employees and business partners act with integrity and honesty. It reflects the Group's zero-tolerance approach and aligns with international standards such as the UN Convention against Corruption and the OECD Anti-Bribery Convention.	▪ The policy defines and prohibits bribery, facilitation payments, kickbacks, and conflicts of interest. ▪ It mandates due diligence on third parties and high-risk transactions and requires employees to report suspected violations through secure and anonymous whistleblower reporting channels. ▪ Regular training is provided to all staff, with enhanced modules for roles exposed to higher corruption risks.	▪ Applies to all employees, directors, contractors, consultants, and third-party intermediaries across operations and the supply chain [MDR-P_65b]. ▪ Stakeholder expectations are integrated through regular risk assessments and engagement with compliance partners and civil society organisations [MDR-P_65e].	▪ Oversight is provided by the Chief Compliance Officer [MDR-P_65c]. ▪ The policy is reviewed annually by the Ethics & Compliance Committee and updated in response to regulatory developments or material incidents.

Background	Key content [MDR-P_65a]	Scope / Key stakeholders	Accountability
	▪ The policy is available in several languages on the intranet and external website [MDR-P_65f].		

Whistleblower Policy [G1-1_10c]

Background	Key content [MDR-P_65a]	Scope / Key stakeholders	Accountability
▪ The Group encourages employees and external stakeholders to report any unethical behaviour or violations of our policies through its whistleblower reporting channels. This policy reflects the commitment to integrity, transparency, and accountability, and ensures that concerns can be raised safely and confidentially.	▪ The policy outlines the procedures for reporting misconduct, including anonymous channels and multilingual access. ▪ It guarantees protection against retaliation for all whistleblowers, in line with the Directive (EU) 2019/1937. ▪ All reports are investigated independently and objectively by trained compliance personnel. ▪ Awareness campaigns and mandatory training ensure that all employees understand their rights and responsibilities under this policy. ▪ The policy is accessible via the Group's intranet and external website in several languages [MDR-P_65f].	▪ Applies to all employees, contractors, suppliers, and other third-party stakeholders [MDR-P_65b]. ▪ Stakeholder feedback is integrated through regular reviews and benchmarking against international best practices [MDR-P_65e].	▪ Oversight is provided by the Chief Compliance Officer [MDR-P_65c]. ▪ The policy is reviewed annually by the Ethics & Compliance Committee and updated to reflect legal and operational developments.

Corporate culture

The Group's corporate culture is built on the values of integrity, transparency and accountability. The Group strives to create a work environment that fosters collaboration, innovation and continuous improvement. Key initiatives to promote a positive corporate culture include:

1. Employee engagement programs (please refer to section 4.2.2 for detailed description of the channels): regular surveys and feedback mechanisms to understand employee concerns and improve workplace satisfaction. In 2025, the bi-annual employee engagement survey had a XX% response rate, with XX % of employees expressing pride in working at the Group [G1-1_9]. This has shown a significant increase of XX% since 2024. The Group attributes this increase to careful consideration of the feedback received from its employees.
2. Diversity, Equity and Inclusion strategy: programs such as the Women Connect Network & Mentoring and Leadership Voices to promote Diversity, Equity and inclusion, ensuring equal opportunities for all employees (please refer to section 4.3 for the related actions, targets and metrics)[G1-1_9].
3. Training and development: continuous training programs to enhance employee skills and knowledge, with a focus on ethical behaviour and compliance. In 2025, XX % (2024: XX %) of employees completed training on these topics [G1-1_10g]. The Group has seen a XX% increase in completion rates of trainings with a focus on ethical behaviour & compliance. The group's aim is to have targeted training and upskilling by 2027 for all relevant roles within the own workforce.
4. Sustainable development goals (SDGs): initiatives designed to support SDG 8, promoting sustained, inclusive and sustainable economic growth, full and productive employment, and decent work for all. Actions include eliminating forced or compulsory labour, supporting higher productivity in developing countries through technological upgrades, and training local labour [G1-1_9].
5. Transition to a greener economy: measures to mitigate negative impacts on workers due to the transition to a greener, climate-neutral economy. This includes training and reskilling, employment guarantees, job counselling, coaching, intra-company placements, and early retirement plans [G1-1_9].

5.2.1 Mechanisms for identifying, reporting, and investigating concerns (including whistleblower incidents)

The Group has established robust mechanisms for identifying, reporting, and investigating concerns related to unlawful behavior or breaches of its Code of Ethics [G1-1_10a]. These include secure internal and external whistleblower reporting channels that ensure confidentiality and allow anonymous reporting for both employees and external stakeholders [G1-1_10c(i)].

To support the effective use of these channels, all employees receive mandatory training on business conduct, including how to identify and report concerns [G1-1_10g]. This training is tailored by role, with enhanced modules for functions exposed to higher corruption risks and is delivered at least annually, with quarterly updates as needed. In 2025, XX% (XX% in 2024) of employees completed this training [G1-1_10g].

The Group enforces a zero-tolerance policy for retaliation. All reports are handled independently of the management chain involved, and any breach of whistleblower protection results in disciplinary action [G1-1_10c(ii)]. In 2025, no retaliation cases were reported (no reports in 2024).

Once an incident is reported, the Group is committed to investigating it promptly, independently, and objectively [G1-1_10e]. Reports are triaged by an independent Review Team, which initiates formal investigations within 24 hours [G1-3_02].

The outcomes of investigations are reported to the administrative, management, and supervisory bodies, including the Audit & Risk Committee, and are documented with findings, corrective actions, and recommendations for internal control improvements [G1-3_03].

Where breaches are confirmed, the Group takes appropriate disciplinary measures, which may include warnings, suspension, termination, or legal action [G1-4_03]. Contracts with third parties may be terminated or not renewed in cases of non-compliance with business conduct standards [G1-4_07].

All confirmed incidents are logged and monitored, and the Group publishes an annual summary of reports received, investigations conducted and outcomes achieved [G1-4_04].

Insights from investigations are used to continuously improve training programs, strengthen internal controls, and reinforce the Group's culture of integrity [G1-3_01].

5.3. Suppliers and payment practices

5.3.1 G1-2 Management of relationships with suppliers

The Group's supplier management is governed by a structured management system that includes directives, guidelines and governing documents applicable to all suppliers. This system ensures that all suppliers meet the high standards for quality, sustainability and ethical conduct.

The Group integrates social and environmental criteria into the supplier selection and contract management processes. These criteria are used as part of the overall risk assessment and are reflected in contractual templates, ensuring that suppliers meet its sustainability expectations [G1-2_15b]. A global category management approach facilitates structured portfolio management, with regular meetings at all contract and management levels to engage with key suppliers and address sustainability-related risks and opportunities [G1-2_14].

Social and environmental criteria embedded in the supplier selection, evaluation, and contract renewal processes include: compliance with the UN Global Compact and ILO conventions; disclosure of carbon footprints for high-impact categories; use of certified sustainable materials (e.g., FSC, Fairtrade); and evidence of Diversity, Equity and Inclusion practices [G1-2_15b]. These criteria are reflected in contractual templates, evaluated through annual self-assessments, and monitored via third-party audits for high-risk suppliers.

In 2025, the Group piloted a supplier ESG scorecard, which will be rolled out across all categories to enhance transparency and accountability [G1-2_15b]. Additionally, supplier relationships are governed by a structured management system that includes a global category management model, a centralised onboarding process with ESG screening, and annual supplier summits to align on strategic priorities and sustainability goals. Quarterly performance reviews are conducted based on KPIs including delivery reliability, quality, and ESG compliance [G1-2_15a].

In 2025, all of the Group's new suppliers signed the Supplier Code of Conduct, which outlines expectations on human rights, anti-corruption, environmental stewardship, and business ethics. Additionally, XX% of Tier 1 suppliers were assessed for ESG compliance, and 12 suppliers were placed on improvement plans following audit findings [G1-2_15a].

The Group conducts regular risk assessments to proactively identify potential areas of corruption and bribery risk within its operations and supply chain. In 2025, the Group conducted 20 such assessments, which revealed key areas for improvement in supplier practices [G1-3_18a]. These assessments begin with mapping high-risk areas, focusing on functions and processes most susceptible to unethical behaviour, such as procurement, sales, and third-party interactions. This is followed by evaluating controls, where the Group assesses the effectiveness of existing safeguards and identify any gaps that require remediation. Finally, the Group emphasises stakeholder engagement by involving both internal teams and external partners to gather insights and feedback, ensuring that the risk mitigation strategies are both informed and practical.

Commentary on the ESRS sustainability disclosures

In 2024 the Group had not adopted the ESG Score card for suppliers, thus the information disclosed in this paragraph is not available for the previous reporting year.

5.3.2 G1-6 Payment practices

The Group is committed to maintaining transparent, fair, and timely payment practices. Its approach to payment practices is designed to support its suppliers, particularly small and medium-sized enterprises (SMEs), and to ensure that business operations are conducted ethically and responsibly.

The Group has established clear and fair payment terms and conditions that are communicated to all suppliers during onboarding and contract negotiation [G1-6_33d]. The standard payment terms are 30 days from the date of invoice receipt [G1-6_33b]. These terms are designed to ensure that the Group's suppliers receive timely payments, which is particularly important for SMEs that may rely on prompt cash flow to sustain their operations. The Group regularly reviews and updates its payment terms to ensure they remain competitive and supportive of suppliers' needs [G1-2_14].

In 2025, the Group achieved an average payment period of 28 days (XX days in 2024) [G1-6_33a], demonstrating its commitment to timely payments. The Group monitors the payment performance closely and strives to maintain or improve this metric. The payment performance is measured by the percentage of invoices paid within the agreed payment terms. In 2025, XX% (XX% in 2024) of invoices were paid on time and aligned with the standard terms [G1-6_33b], reflecting the Group's dedication to maintaining strong relationships with its suppliers. The Group has no outstanding legal proceedings for late payments [G1-6_33c].

Recognising the importance of SMEs in the supply chain, the Group has implemented several initiatives to support these businesses. These initiatives include early payment options for SMEs, allowing them to receive payments ahead of the standard payment terms. This helps improve their cash flow and financial stability.

The Group has also established dedicated support channels for SMEs to address any payment-related queries or issues promptly. This ensures that any concerns are resolved quickly, maintaining a positive relationship with suppliers. Transparency is a key aspect of the Group's payment practices. The Group is committed to providing clear and accurate information about payment performance to the stakeholders. In 2025, the Group published a detailed report on payment practices, including metrics such as the average payment period, the percentage of invoices paid on time and the support provided to SMEs. This report is available on the Group's website and is updated annually to reflect the ongoing commitment to transparency and accountability.

Commentary on the ESRS sustainability disclosures

In the illustration above the reference to the Group's website for the Group's Payment Practices Report does not represent incorporation by reference and is only made for further informational purposes.

5.4. Corruption and bribery

5.4.1 G1-3 Prevention and detection of corruption and bribery

The Group believes that fostering a culture of integrity begins with equipping employees with the knowledge and tools to act ethically and responsibly.

To that end, the Group provides mandatory training to all employees, with tailored modules for those in high-risk functions—who play a critical role in setting the tone at the top [G1-3_21c]. Its training program is designed to be both comprehensive and practical. It covers the nature, scope, and depth of its anti-corruption and anti-bribery policies, ensuring that employees are familiar with the legal and ethical standards that govern its operations and that they understand how to identify and report suspicious activities. Training is conducted annually, with additional refresher sessions and updates provided in response to regulatory changes or emerging risks [G1-3_21a].

In 2025, XX% (XX% in 2024) of employees successfully completed this training [G1-3_21b]. In 2025, XX% (XX% in 2024) of the members of the administrative, management, and supervisory bodies at the Group completed mandatory anti-corruption and anti-bribery training [G1-3_21c]. This training was delivered through a combination of executive workshops, board-level briefings, and e-learning modules tailored to their oversight responsibilities.

Training activities were also analysed by region and function. This analysis helps tailor future training to regional and functional needs [G1-3_AR_7]. In 2025, XX % (XX% in 2024) of employees in Europe and XX % (XX% in 2024) in Asia completed mandatory anti-corruption training. The Group has identified procurement, sales and marketing, finance, legal, and individuals with managerial authority or executive responsibilities, e.g., Board members, as the functions and individuals most at risk in respect of corruption and bribery [G1-3_21b]. This determination is based on internal audits, compliance reviews, and risk exposure assessments. In 2025, high-risk functions had full coverage, while support functions had XX % (XX% in 2024) completion. The training programme includes tailored modules that address the specific risks associated with each function and is delivered through a combination of e-learning, workshops, and scenario-based exercises.

Attendance is tracked and reported to the Audit & Risk Committee [G1-3_21a, 21c]

The Group has also implemented a robust due diligence framework to ensure that all third parties, including suppliers, contractors and business partners adhere to the ethical standards and comply with the anti-corruption and anti-bribery policies [G1-3_18a]. This framework begins with third-party screening, where the Group conducts background checks and risk assessments for all new suppliers and partners before engagement [G1-3_01]. These assessments help identify potential red flags and ensure alignment with the Group's values from the outset. To reinforce accountability, the Group incorporates contractual clauses that explicitly address anti-corruption and anti-bribery obligations in all agreements. These clauses serve as a binding commitment to ethical conduct and provide a basis for corrective action if breaches occur [G1-3_03].

The Group's approach includes ongoing monitoring of third-party activities. The Group conducts periodic audits and reviews to verify compliance, assess performance, and identify any emerging risks [G1-3_05]. This continuous oversight allows for maintaining high standards of integrity throughout the value chain and respond proactively to any concerns.

Internal audits form a key component of the governance framework, helping the Group monitor compliance with the anti-corruption and anti-bribery policies and identify areas for continuous improvement [G1-3_18a]. In 2025, the internal audit team conducted XX audits (XX in 2024), several of which highlighted opportunities to strengthen controls, particularly in the area of sustainability reporting [G1-3_06].

The audit process begins with audit planning, where the Group develops a comprehensive plan that prioritises high-risk areas and functions based on previous findings, risk exposure, and operational complexity [G1-3_01]. This is followed by audit execution, which involves a combination of document reviews, stakeholder interviews, and on-site visits to ensure a thorough and evidence-based evaluation [G1-3_05]. Audit findings are reported to senior management and the Audit & Risk Committee and are tracked through corrective action plans to ensure timely resolution and accountability [G1-3_03]. This structured approach ensures that internal controls remain robust, responsive, and aligned with the Group's commitment to ethical business conduct [G1-3_08].

The Group has established a confidential and accessible whistleblower system that enables both employees and third parties to report suspected cases of corruption, bribery, or other unethical conduct [G1-3_18a]. In 2025, the system received XX reports (XX in 2024), which led to XX (XX in 2024) formal investigations and the implementation of XX (XX in 2024) corrective actions to address identified issues [G1-3_18a]. The Group has established a dedicated team responsible for investigating all reported incidents of corruption or bribery.

This team ensures that each case is handled with thoroughness, impartiality and urgency, in line with its commitment to ethical business conduct [G1-3_18b].

The investigation process begins with an immediate response, with investigations initiated within 24 hours of receiving a report to ensure timely action and preserve the integrity of evidence [G1-4_24a]. Once a case is opened, the Group prioritises secure communication with the reporting individual, using confidential channels to gather additional information and provide updates on the status of the investigation [G1-4_24a]. Throughout the process, the Group maintains detailed documentation of all findings, decisions, and actions taken, ensuring transparency and accountability in every case [G1-4_24a]. The outcomes of investigations are reported to the administrative, management, and supervisory bodies (Board of directors, Ethics & Compliance Committee as well as the Audit & Risk Committee) [G1-3_18c]. This ensures transparency and accountability in addressing incidents of corruption and bribery.

The Group ensures that the anti-corruption and anti-bribery policies are communicated to all relevant stakeholders to ensure accessibility and understanding [G1-3_20]. This includes disseminating policies through internal communication channels, such as emails, intranet and training sessions. The Group also shares policies with suppliers, business partners, and other external stakeholders through contracts, agreements and onboarding processes.

5.4.2 G1-4 Incidents of corruption or bribery

The Group is committed to transparency and accountability in managing incidents of corruption or bribery. In 2025, the Group received XX (XX in 2024) reports through the whistleblower reporting system, resulting in XX (XX in 2024) investigations and XX (XX in 2024) corrective actions [G1-4_24a]. For details on how reported incidents are managed through reporting, investigation, and corrective action mechanisms, please refer to section 5.2.1.

In addition to these mechanisms, incidents of Corruption & Bribery are followed up with thorough analyses to identify the underlying causes of the corruption or bribery incident. This involves reviewing internal controls, policies, and procedures to determine any weaknesses or gaps [G1-4_24b]. A comprehensive action plan is then developed to address the identified root causes. This plan includes specific measures such as revising internal policies, enhancing training programs, and improving internal controls [G1-4_24b]. The action plan is implemented by the relevant departments and overseen by the Compliance Officer and executive management. This ensures that corrective actions are effectively executed and monitored [G1-4_24b].

Continuous monitoring is conducted to ensure the effectiveness of the corrective actions and to prevent recurrence. Regular audits and reviews are performed to assess the implementation and impact of the corrective measures [G1-4_24b]. All required actions related to corruption and bribery have been adopted and no material gaps were identified in 2025. However, the Group continues to monitor emerging risks and regulatory developments to ensure timely adoption of new measures [MDR-A_62]. Regular reporting to senior management on the progress and effectiveness of the corrective actions is conducted to ensure transparency and accountability in addressing the incidents [G1-4_24b].

Based on the investigation findings, the appropriate disciplinary measures are determined. This involves a fair and thorough investigation process to ensure that the actions taken are justified and proportionate to the severity of the misconduct [G1-4_24b]. Disciplinary measures may include warnings, suspension, demotion, or termination of employment, if necessary. The severity of the disciplinary actions is based on the nature and impact of the misconduct. If necessary, legal action may be pursued against the individual(s) involved.

In 2025, the Group recorded zero material convictions for violations of anti-corruption and anti-bribery laws (XX in 2024) [G1-4_24a]. This reflects the effectiveness of the internal controls, training programmes, and whistleblower mechanisms in preventing and addressing misconduct. Additionally, no fines were imposed on the Group in 2025 (XX in 2024) for violations of anti-corruption or anti-bribery laws [G1-4_24a].

5.5. Public policy and political engagement

5.5.1 G1-5 Political influence and lobbying activities

Political engagement and lobbying activities of the Group are overseen by the CSO [G1-5_29a]. This governance structure ensures that its political activities are aligned with the broader strategy and sustainability agenda, upholding strict standards of transparency and integrity.

In 2025, adhering to the Group's policy prohibiting direct financial donations to political entities [G1-5_29b(i)], the Group made no such contributions to political parties, their elected representatives, or individuals seeking political office (same as in 2024) [G1-5_29b]. The employee code of conduct strictly prohibits any form of financial or in-kind political contributions [G1-5_20b(i)].

While the Group does not make direct political contributions, the Group engages in political processes indirectly by collaborating with non-governmental organisations (NGOs) and other policymakers to promote the transition to a greener economy. This includes participating in industry associations and trade groups that may engage in political activities. The Group's contributions aim to enrich dialogues concerning sustainable brewing practices, environmental protection, and the transition to renewable energy sources [G1-5_29c].

Type of contribution	Amount in 2025(€)	Amount in 2024(€)	Recipient	Country	Direct/Indirect
Financial	0	0	N/A	N/A	Direct
In-Kind	0	0	N/A	N/A	Direct
Membership Fees to Trade Associations	€XXX million	€XXX million	Brewers of Europe, National Beverage Council	EU	Indirect

This table reflects the Group's policy of not making direct political contributions. Indirect contributions are limited to industry associations that may engage in lobbying [G1-5_29b(ii)].

The Group is not registered on the EU Transparency Register or any similar registers [G1-5_29d]. However, the Group maintains transparency in its political engagement activities and ensures that any involvement in industry associations and trade groups is publicly accessible on relevant websites and platforms. No members of the Group's Board or Executive Management held roles in public administration or regulatory bodies in the two years prior to the 2025 reporting period. This ensures that political engagement activities are conducted with the highest level of integrity and independence.

Sustainable Brewing Practices

The Group engages in dialogue with policymakers to advocate for stable regulatory environments that support sustainable brewing practices. This includes promoting the use of renewable energy in brewing processes and reducing water usage. These lobbying efforts support the ambitions related to reducing greenhouse gas emissions and promoting cleaner energy, as outlined in the Group's sustainability goals [G1-5_29c]. Through advocacy for renewable energy development and water conservation, the Group contributes to shaping a regulatory environment that encourages sustainable brewing practices. The Group actively participates in discussions with policymakers to advocate for policies that protect the environment. This includes supporting regulations that limit pollution and promote biodiversity.

The Group's engagements are aligned with the identified material impacts, risks, and opportunities within the environmental protection initiatives. By advocating for stricter environmental regulations, the Group aims to minimise its ecological footprint and promote biodiversity [G1-5_29c].

By adhering to these principles and practices, the Group ensures that political influence and lobbying activities are conducted transparently and ethically, supporting its commitment to sustainability and responsible business conduct.

6. Appendix A

Appendix A is not part of the sustainability statement but part of the Group's management report, which is incorporated by reference in the sustainability report.

6.1. List of disclosure requirements complied with and datapoints that derive from other EU legislation[13]

[13] This table is intended to address DR ESRS 2 IRO-2 paragraph 56.

Standard	Disclosure requirement	Title	ESRS datapoint derived from other EU legislation	Applicable other EU legislation [14] [15] [16] [17]	Datapoint derived from other EU legislation not material?	Section reference
ESRS 2		**General disclosures**				
	BP-1	General basis for preparation of the sustainability statement				2.1.1
	BP-2	Disclosures in relation to specific circumstances				2.1.2
	GOV-1	The role of the administrative, management and supervisory bodies	Board's gender diversity Paragraph 21 (d)	SFDR Benchmark Regulation		2.2.1 Management report – section XXX[18]
			Percentage of board members who are independent Paragraph 21 (e)	Benchmark Regulation		
	GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies				2.2.2
	GOV-3	Integration of sustainability-related performance in incentive schemes				2.2.3
	GOV-4	Statement on due diligence	Paragraph 30	SFDR		2.2.4
	GOV-5	Risk management and internal controls over sustainability reporting				2.2.5

[14]Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation) (OJ L 317, 9.12.2019, p. 1).
[15]Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation "CRR") (OJ L 176, 27.6.2013, p. 1).
[16]Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).
[17]Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9.7.2021, p. 1).
[18] Part of information is incorporated by reference. Please see section 2.1.2 for more details.

Standard	Disclosure requirement	Title	ESRS datapoint derived from other EU legislation	Applicable other EU legislation [14] [15] [16] [17]	Datapoint derived from other EU legislation not material?	Section reference
	SBM-1	Strategy, business model and value chain	Involvement in activities related to fossil fuel activities Paragraph 40 (d) i	SFDR Pillar 3 Benchmark Regulation	Not material	2.3.1 Management report - section XXX[19]
			Involvement in activities related to chemical production Paragraph 40 (d) ii	SFDR Benchmark Regulation	Not material	
			Involvement in activities related to controversial weapons Paragraph 40 (d) iii	SFDR Benchmark Regulation	Not material	
			Involvement in activities related to cultivation and production of tobacco Paragraph 40 (d) iv	Benchmark Regulation	Not material	
	SBM-2	Interests and views of stakeholders				2.3.2
	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model				2.4.1
	IRO-1	Description of process to identify and assess material impacts, risks and opportunities				2.4.2 3.2
	IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement				Appendix A
E1		**Climate change**				
	ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes				2.2.3

[19] Part of information is incorporated by reference. Please see section 2.1.2 for more details.

Standard	Disclosure requirement	Title	ESRS datapoint derived from other EU legislation	Applicable other EU legislation [14] [15] [16] [17]	Datapoint derived from other EU legislation not material?	Section reference
	E1-1	Transition Plan for climate change mitigation	Transition Plan to reach climate neutrality by 2050 Paragraph 14	EU Climate Law		3.4.1
			Undertakings excluded from Paris-aligned Benchmarks Paragraph 16 (g)	Pillar 3 Benchmark Regulation		
	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model				3.1 , 3.3.1
	ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities				3.2
	E1-2	Policies related to climate change mitigation and adaptation				3.5.1
	E1-3	Actions and resources in relation to climate change policies				3.5.2
	E1-4	Targets related to climate change mitigation and adaptation	GHG emission reduction targets Paragraph 34	SFDR Pillar 3 Benchmark Regulation		3.5.3
	E1-5	Energy consumption and mix	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) Paragraph 38	SFDR		3.6.1
			Energy consumption and mix Paragraph 37	SFDR		
			Energy intensity associated with activities	SFDR		

Standard	Disclosure requirement	Title	ESRS datapoint derived from other EU legislation	Applicable other EU legislation [14 15 16 17]	Datapoint derived from other EU legislation not material?	Section reference
			in high climate impact sectors Paragraphs 40 to 43			
	E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Gross Scope 1, 2, 3 and Total GHG emissions Paragraph 44	SFDR Pillar 3 Benchmark Regulation		3.6.2
			Gross GHG emissions Intensity Paragraphs 53 to 55	SFDR Pillar 3 Benchmark Regulation		
	E1-7	GHG removals and GHG mitigation projects financed through carbon credits	GHG removals and carbon credits Paragraph 56	EU Climate Law		3.6.3
	E1-8	Internal carbon pricing				3.6.4
	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Exposure of the benchmark portfolio to climate-related physical risks Paragraph 66	Benchmark Regulation		3.7
			Disaggregation of monetary amounts by acute and chronic physical risk Paragraph 66 (a) Location of significant assets at material physical risk Paragraph 66 (c)	Pillar 3		
			Breakdown of the carrying value of its real estate assets by energy-efficiency classes Paragraph 67 (c)	Pillar 3		

Standard	Disclosure requirement	Title	ESRS datapoint derived from other EU legislation	Applicable other EU legislation [14] [15] [16] [17]	Datapoint derived from other EU legislation not material?	Section reference
			Degree of exposure of the portfolio to climate-related opportunities Paragraph 69	Benchmark Regulation		
S1		**Own Workforce**				
	ESRS 2 SBM-2	Interests and views of stakeholders				2.3.2
	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Risk of incidents of forced labour Paragraph 14 (f)	SFDR		4.1
			Risk of incidents of child labour Paragraph 14 (g)	SFDR		
	S1-1	Policies related to own workforce	Human rights policy commitments Paragraph 20	SFDR		4.2.1
			Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8 Paragraph 21	Benchmark Regulation		
			Processes and measures for preventing trafficking in human beings Paragraph 22	SFDR		
			Workplace accident prevention policy or management system Paragraph 23	SFDR		

Standard	Disclosure requirement	Title	ESRS datapoint derived from other EU legislation	Applicable other EU legislation [14] [15] [16] [17]	Datapoint derived from other EU legislation not material?	Section reference
	S1-2	Processes for engaging with own workforce and workers' representatives about impacts				4.2.2
	S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	Grievance/complaints handling mechanisms Paragraph 32 (c)	SFDR		4.2.3
	S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions				4.3, 4.4, 4.5
	S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities				4.3, 4.4, 4.5
	S1-6	Characteristics of the undertaking's employees				4.3.1
	S1-7	Characteristics of non-employee workers in the undertaking's own workforce				4.3.2
	S1-8	Collective bargaining coverage and social dialogue				4.4.1
	S1-9	Diversity metrics				4.3.1
	S1-10	Adequate wages				4.4.2
	S1-13	Training and skills development metrics				4.5.3
	S1-14	Health and safety metrics	Number of fatalities and number and rate of work-related accidents Paragraph 88 (b) Paragraph 88 (c)	SFDR Benchmark Regulation		4.5.1

Standard	Disclosure requirement	Title	ESRS datapoint derived from other EU legislation	Applicable other EU legislation [14] [15] [16] [17]	Datapoint derived from other EU legislation not material?	Section reference
			Number of days lost to injuries, accidents, fatalities or illness Paragraph 88 (e)	SFDR		
	S1-15	Work-life balance metrics				4.5.2
	S1-16	Remuneration metrics (pay gap and total compensation)	Unadjusted gender pay gap Paragraph 97 (a)	SFDR Benchmark Regulation		4.3.3
			Excessive CEO pay ratio Paragraph 97 (b)	SFDR		
	S1-17	Incidents, complaints and severe human rights impacts	Incidents of discrimination Paragraph 103 (a)	SFDR		4.4.3
			Non-respect of UNGPs on Business and Human Rights and OECD Paragraph 104 (a)	SFDR Benchmark Regulation		
G1		**Business Conduct**				
	ESRS 2 GOV-1	The role of the administrative, supervisory and management bodies				2.2.1 Management report - section XXX[20]
	ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities				2.4.2
	G1-1	Business conduct policies and corporate culture	United Nations Convention against Corruption Paragraph 10 (b)	SFDR		5.1 5.2

[20] Part of information is incorporated by reference. Please see section 2.1.2 for more details.

Standard	Disclosure requirement	Title	ESRS datapoint derived from other EU legislation	Applicable other EU legislation [14 15 16 17]	Datapoint derived from other EU legislation not material?	Section reference
			Protection of whistle-blowers Paragraph 10 (d)	SFDR	Not material	
	G1-2	Management of relationships with suppliers				5.3.1
	G1-3	Prevention and detection of corruption and bribery				5.4.1
	G1-4	Incidents of corruption or bribery	Fines for violation of anti-corruption and anti-bribery laws Paragraph 24 (a)	SFDR Benchmark Regulation		5.4.2
			Standards of anti-corruption and anti-bribery Paragraph 24 (b)	SFDR		
	G1-5	Political influence and lobbying activities				5.5.1
	G1-6	Payment practices				5.3.2

7. Appendix B

Appendix B is not part of the sustainability statement and is provided solely for informational purposes.

7.1. Disclosure requirements that are not illustrated

This statement does not illustrate the following disclosure requirements or data points. Please note that the list below excludes voluntary disclosure requirements or data points:

Disclosure requirement	ESRS Reference	Description	Reason
ESRS 2 BP-1	ESRS 2 BP-1 paragraph 5 b ii	Indication of which subsidiary undertakings included in the consolidation are exempted from individual or consolidated sustainability reporting pursuant to Articles 19a (9) or 29a (8) of Directive 2013/34/EU;	Not applicable
ESRS 2 BP-2	ESRS 2 BP-2 paragraph 9 b	Disclosure of reasons for applying different definitions of time horizons	Not applicable
ESRS 2 BP-2	ESRS 2 BP-2 paragraph 13	Disclosures related to changes in preparation or presentation of sustainability information	Not applicable
ESRS 2 BP-2	ESRS 2 BP-2 paragraph 14	Disclosures related to reporting errors in prior periods	Not applicable
ESRS 2 BP-2	ESRS 2 BP-2 paragraph 15	Disclosure of reference to paragraphs of other standards or framework applied	Not applicable
ESRS 2 BP-2	ESRS 2 BP-2 paragraph 17a-e	Disclosures on material topics for which information as required by ESRS E4, S1, S2, S3 or S4 is omitted in accordance with ESRS 1 Appendix C.	Not applicable
ESRS 2 GOV-1	ESRS 2 GOV-1 paragraph 21	Information about the composition and diversity of the members of the undertaking's administrative, management and supervisory bodies	Incorporated by reference
ESRS 2 GOV-1	ESRS 2 GOV-1 paragraph 23 b	Information on how the administrative, management and supervisory bodies' skills and expertise relate to the Group's material impacts, risks and opportunities.	Incorporated by reference
ESRS 2 SBM-1	ESRS 2 SBM-1 paragraph 40 b	Revenue by significant ESRS Sectors	Phased-in provision applied
ESRS 2 SBM-1	ESRS 2 SBM-1 paragraph 40 c	List of additional significant ESRS sectors in which significant activities are developed or in which undertaking is or may be connected to material impacts	Phased-in provision applied
ESRS 2 SBM-1	ESRS 2 SBM-1 AR 12	Mapping of significant activities in accordance with ESRS sectors to provide the information on sectors	Not applicable
ESRS 2 SBM-1	ESRS 2 SBM-1 paragraph 40 di, ii, iii, iv	Statement indicating, together with related revenues, that the undertaking is active in fossil fuel, chemicals production, controversial weapons, and/or cultivation and production of tobacco.	Not applicable
ESRS 2 SBM-1	ESRS 2 SBM-1 paragraph 41	List of ESRS sectors that are significant for undertaking	Not illustrated for the purpose of this illustrative sustainability statement

Disclosure requirement	ESRS Reference	Description	Reason
ESRS 2 SBM-3	ESRS 2 SBM-3 paragraph 48e	Anticipated financial effects	Only illustrated for certain data points regarding climate-related risks for the purpose of this illustrative sustainability statement
ESRS 2 SBM-3	ESRS 2 SBM-3 paragraph 48h	Disclosure of specification of impacts, risks and opportunities that are covered by ESRS disclosure requirements as opposed to those covered by additional entity-specific disclosures	Not applicable
ESRS 2 IRO-2	ESRS 2 IRO-2 paragraph 57	Disclosure of a detailed explanation of the conclusions of the materiality assessment with regard to climate change if it is concluded that climate change is not material	Not applicable
ESRS 2 MDR-P, MDR-A	ESRS 2 MDR-P, MDR-A paragraph 62	Sustainability matter(s) for which policies and actions have not been adopted	Not applicable
ESRS 2 MDR-A	ESRS 2 MDR-A paragraphs 68d	Disclosure of key actions taken to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts	Not applicable
E1-1	ESRS E1 E1-1 paragraph 16e	Disclosure of explanation of any objective or plans that the undertaking has for aligning its economic activities (revenues, CapEx, OpEx) with the criteria established in Commission Delegated Regulation 2021/2139 (29)	Not illustrated for the purpose of this illustrative sustainability statement
E1-3	ESRS E1 E1-3 paragraph 29cii and iii	Disclosure of significant monetary amounts of CapEX and OpEx required to implement the actions taken or planned to: (ii) the key performance indicators required under Commission Delegated Regulation (EU) 2021/2178); and (iii) if applicable, the CapEX plan required by the Commission Delegated Regulation (EU) 2021/2178	Not illustrated for the purpose of this illustrative sustainability statement
E1-5	ESRS E1 E1-5 paragraph 39	Disclosure of non-renewable energy production and renewable energy production	Not applicable
E1-6	ESRS E1 E1-6 AR 43c	Disclosure of biogenic emissions of CO2 from the combustion or biodegradation of biomass not included in Scope 1 GHG emissions	Not applicable
E1-6	ESRS E1 E1-6 paragraph 50	Scope 1 and 2 GHG emissions – breakdown between consolidated accounting group and other investees not fully consolidated	Not applicable
E1-6	ESRS E1 E1-6 AR 50	Presentation of the Scope 3 GHG emissions by according to the indirect emission categories defined in EN ISO 14064-1:2018	Not applicable
E1-7	ESRS E1 E1-7 AR 58e	Disclosure of removal activity converted into carbon credits and sold on to other parties on voluntary market	Not applicable
E1-7	ESRS E1 E1-7 paragraphs 59a, b	Total amount of carbon credits outside value chain that are verified against recognised quality standards and cancelled and planned to be cancelled in future	Not applicable
E1-7	ESRS E1 E1-7 paragraph 61	Disclosure about public claims of GHG neutrality that involve use of carbon credits	Not applicable

Disclosure requirement	ESRS Reference	Description	Reason
E1-9	ESRS E1 E1-9 paragraph 66d, 67d, 67d, 69, 70	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Only illustrated for certain data points for the purpose of this illustrative sustainability statement
S1-2	ESRS S1 S1-2 paragraph 29	Statement in case the undertaking has not adopted a general process to engage with its own workforce	Not applicable
S1-3	ESRS S1 S1-3 paragraph 34	Statement in case the undertaking has not adopted a channel for raising concerns	Not applicable
S1-7	ESRS S1 S1-7 paragraph 57	Description of basis of preparation of non-employees estimated number	Not applicable
S1-11	ESRS S1 S1-11 paragraphs 74-75	Disclosure of Social protection against loss of income due to major life events.	Not material
S1-12	ESRS S1 S1-12 paragraph 79, AR 76	Disclosure of the percentage of its own employees with disabilities.	Not material
G1-1	ESRS G1 G1-1 paragraph 10d	No policies on protection of whistleblowers	Not applicable
G1-1	ESRS G1 G1-1 paragraph 10f	Policies with respect to animal welfare	Not material
G1-3	ESRS G1 G1-3 paragraph 19	Plan to adopt procedures to prevent and detect corruption and bribery, if they are not in place	Not applicable
G1 ESRS 2 GOV-1	ESRS G1 ESRS 2 GOV-1 paragraph 5b	Disclosure of expertise of administrative, management and supervisory bodies on business conduct matters	Incorporated by reference

7.2. Glossary of abbreviations and terms

Abbreviations	Full term
AR	Application Requirements
BP	Basis for preparation
CO2	Carbon Dioxide
CapEx	Capital Expenditure
CSO	Chief Sustainability Officer
CSRD	Corporate Sustainability Reporting Directive
DEI	Diversity, Equity and Inclusion
DMA	Double materiality analysis
DP	Data point
DR	Disclosure requirements
EAP	Employee assistance program
EEA	European Economic Area
EPC	Energy Performance Certificate
ESMA	European Securities and Markets Authority
ESRS	European Sustainability Reporting Standards
ESRS 2	European Sustainability Reporting Standards 2 General disclosures
ESRS E1	European Sustainability Reporting Standards E1 Climate change
ESRS G1	European Sustainability Reporting Standards G1 Business conduct
ESRS S1	European Sustainability Reporting Standards S1 Own workforce
EUR	Euro
EWC	European Works Council
FTE	Full-time equivalent
GFA	Global Framework Agreement
GHG	Greenhouse Gas
GOV	Governance
GWP	Global Warming Potential
HFCs	Hydrofluorocarbons
ILO	International Labour Organisation
IPCC	Intergovernmental Panel on Climate Change
IRO	Impacts, Risks and Opportunities
ISO	International Organisation for Standardization
LGBTQI	Lesbian, Gay, Bisexual, Transgender, Queer, Intersex
LTIF	Lost Time Incident Frequency
MDR	Minimum disclosure requirement
MWh	Mega-Watt-hours
NGOs	Non-Governmental Organisations
OECD	Organisation for Economic Co-operation and Development
OpEx	Operating Expenditure

Abbreviations	Full term
SBM	Strategy and business model
SBTi	Science Based Targets Initiative
SCE	Societas Cooperativa Europaea
SDGs	Sustainable Development Goals
SE	Societas Europaea
SFDR	Regulation (EU) 2019/2088 of the European Parliament and of the Council (3) (Sustainable Finance Disclosures Regulation)
TCFD	Task Force on Climate-Related Financial Disclosures
UN	United Nations
UNGP	United Nations Guiding Principles

Please refer to "ANNEX II ACRONYMS AND GLOSSARY OF TERMS, Table 2 Terms defined in the ESRS" in ESRS as published in the Commission Delegated Regulation 2023/2772 for the definition of the terms used for the preparation of the illustrative sustainability statement in accordance with the ESRS.

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