



Feralco Group Impact Report 2025

We make clean water possible

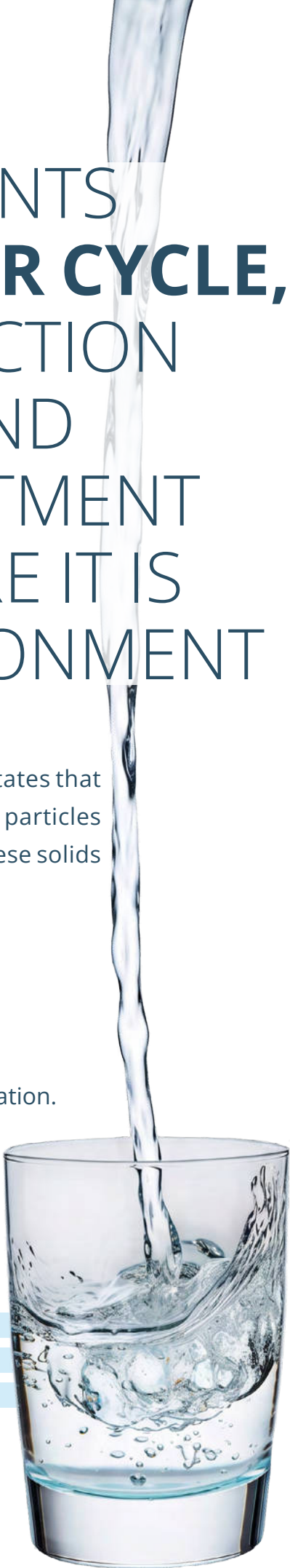


FERALCO'S COAGULANTS PLAY A CRITICAL ROLE IN THE WATER CYCLE, ENABLING THE PRODUCTION OF CLEAN WATER AND SUPPORTING THE TREATMENT OF USED WATER BEFORE IT IS RETURNED TO THE ENVIRONMENT



Metal coagulants work by creating metal hydroxide precipitates that destabilise and capture contaminants; coagulation makes particles stick, precipitation creates solids, and flocculation grows these solids into large flocs that can be removed from the water.

- COAGULATION:** destabilise particles.
- PRECIPITATION:** create insoluble metal hydroxides and contaminant solids.
- FLOCCULATION:** grow particles into removable flocs.
- THE RESULT:** clean water through sedimentation and/or filtration.





READER'S GUIDE

THIS REPORT IS FERALCO GROUP'S first group-wide sustainability publication. Although it has been prepared with reference to the European Sustainability Reporting Standards (ESRS), it does not claim full compliance. While not externally assured, the methodology has been internally reviewed and validated through a cross-functional process. Due to inherent uncertainties, the results should be interpreted as indicative estimate. As this is our first year of structured group-wide reporting, some data, baselines and methodologies are still being developed, and certain metrics are based on internal estimates. Figures may therefore be refined in future reports.

THIS REPORT IS DIVIDED INTO two sections. The first part is organised to support clear navigation from strategy to disclosures. It begins with strategic highlight sections aligned with Feralco's sustainability strategy, summarising key priorities, performance and developments and showing how these connect to the ESRS topics covered later in the report. The second part, the sustainability statement, is built around the ESRS structure, with subsequent sections providing disclosures on policies, actions, metrics and targets where data and methodology allow at this stage.

IMPRESSUM

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HUITOREL & CHILDS

A MESSAGE FROM THE CO-CEOS

Water is at the heart of everything we do. Our customers demand reliability, consistent quality and compliance with all appropriate regulations and standards when procuring our products and services. We strive to meet the same expectations in how we approach and deal with our sustainability challenges. Our sustainability progress is built on three priorities: credible data, value-chain cooperation, and responsible chemistry for resilient water systems. Transparency is a key element both in what we strive to achieve and what measurable results we can demonstrate at a Group level. We will over time strengthen the quality and traceability of our sustainability data, isfy such increasing demands. One such example is the group-wide reporting system introduced in 2025, which was designed to support reporting on the first Double Materiality Assessment across the full Group in line with the originally published European Sustainability Reporting Standards. Climate-related topics remain among the most significant, alongside pollution prevention and regulatory compliance, resource use and circular solutions, occupational health and safety, and business conduct.

Our sustainability strategy is designed as one connected system rather than separate initiatives, as progress in one area depends on enabling actions in another. This report

“GOOD GOVERNANCE PROVIDES THE STRUCTURE FOR OUR SUSTAINABILITY WORK”

integrate sustainability more practically into supplier and customer dialogue, and continue reducing the footprint and risks of the products and operations that support essential water treatment.

In 2025, The Feralco Group made significant steps to improving our sustainability management across our companies and countries. Building upon our decentralised organisational structure, the company is working to fulfil its existing and anticipated regulatory requirements. An increased awareness and focus upon Environmental, Societal and Governance responsibilities is one such development. As such we have worked to strengthen our internal structures and processes to more efficiently sat-

reflects how we translate that focus into action.

On climate, our starting point is to address what we can directly influence and what is required to steer us in the right direction, most notably consistent and coherent data collection and interpretation. Across the Group, we measure energy use and the associated greenhouse gas footprint, covering electricity, natural gas and fuels as well as heat, steam and cooling linked to our production processes. We are also transparent in identifying that the greatest footprint sits upstream, driven largely by raw materials (contributing to >80% of our Scope 3 emissions) and out-sourced transportation. We aim to combine

greenhouse gas reductions in our own operations with supplier engagement and informed purchasing decisions, whilst recognising the practical constraints where options are limited or lower carbon alternatives come at a much higher cost.

Environmental performance is broader than carbon alone. Pollution prevention and strong operational control are pillars within our industry and are central facets in protecting water bodies and communities. Circular solutions and resource efficiency reinforce this by reducing waste and avoiding unnecessary use of virgin raw materials. We have Group companies focused on the effective reuse of spent materials.

Our employees are the drivers of our performance. We aim to provide annual ESG training for all employees while strengthening employability through continuous learning and development planning. As this target was introduced during 2025, complete follow-up data on employee training is not yet available. However, the ambition is clear: to build ESG awareness and practical capability across the Group, so that employees are equipped to contribute to safe, responsible and sustainable performance.

Good governance provides the structure for our sustainability work, supporting clear

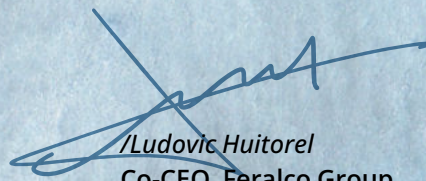
expectations, reliable reporting and consistent management of legal and ethical requirements across the Group. It is further supported by an independent whistleblowing channel and supplier management so that standards on business conduct and working conditions extend into the value chain. In 2025, no compliance incidents, such as reported breaches of the Code of Conduct, were recorded through the Group's available reporting channels.

The Feralco Group will continue to develop and communicate the role of our prod-

ucts in essential water treatment, while reducing the footprint and risks connected to production, sourcing, logistics and use. We will strengthen sustainability dialogue with key suppliers and customers, using it to improve transparency, reduce risks and support long-term value creation.

This report is not only a response to regulation. It is a management tool for The Feralco Group, helping us connect impacts, risks and opportunities to the actions we take and the performance we measure across our company.

WE WOULD LIKE TO THANK OUR COLLEAGUES ACROSS THE GROUP FOR THEIR WORK IN IMPROVING DATA QUALITY, STRENGTHENING ROUTINES AND DELIVERING PRACTICAL MEASURES, AND WE THANK OUR CUSTOMERS, SUPPLIERS AND PARTNERS FOR THE COLLABORATION THAT DRIVES PROGRESS IN OUR INDUSTRY.


/Ludovic Huitorel
Co-CEO, Feralco Group


/Stephen Childs
Co-CEO, Feralco Group



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ABOUT FERALCO GROUP
TREATING WATER ACROSS EUROPE

The Feralco Group is a European supplier of water treatment and process chemicals, headquartered in Helsingborg, Sweden. We supply coagulants, flocculants and other reagents that help municipalities, utilities and industrial customers produce safe drinking water, treat wastewater and manage industrial effluents, including applications such as papermaking. We operate as one group with local country organisations, including 21 industrial sites in Sweden, the Netherlands, Germany, the UK, France, Italy and Spain, as well as a distribution site in Switzerland. We combine local presence with reliable supply, logistics and technical support such as jar testing, on-site trials and performance monitoring. Based on a modelled estimation across the Group, our products support water services reaching more than 150 million people in Europe. Our operations rely on long-term supplier relationships and key inputs such as aluminium- and iron-based materials and acids, along with energy, water and specialised equipment. By converting these resources into effective products, we help secure reliable water treatment with proven chemistry, backed by transparent sustainability data, and robust logistics systems that support both compliance today and resilience for tomorrow.

FACTS AT A GLANCE

- OWNER:

Mellby Gård Group, Sweden.
- HEAD OFFICE LOCATION:

Helsingborg, Sweden.
- ORIGINS:

Founded in 2000 through the acquisition of water treatment businesses of Alcan and Laporte in the UK, followed by growth through acquisitions and new plants.
- EUROPEAN FOOTPRINT:

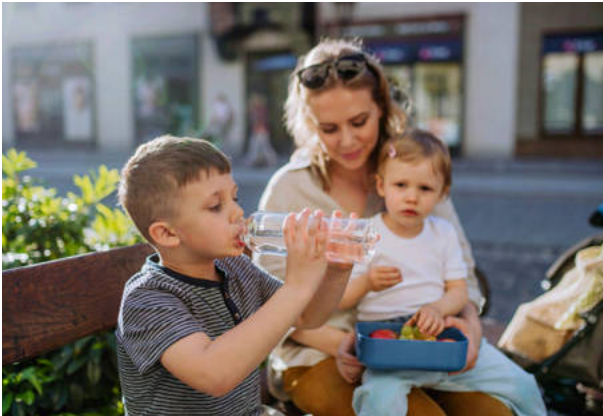
21 industrial sites in 8 countries.
- WATER TREATMENT REACH:

Feralco's products are estimated to have supported the treatment of about 10 billion m³ of water and wastewater in 2025
- PEOPLE REACHED THROUGH WATER SERVICES:

Feralco's products are estimated to support drinking water and/or wastewater treatment services for about 150 million people.
- NET SALES (2025):

SEK 2 532 million (228.74 MEUR)
- EMPLOYEES (2025):

319 FTEs





SUSTAINABILITY HIGHLIGHTS AND REVIEW 2025 FERALCO GROUP

INTRODUCING FERALCO GROUP'S FIRST IMPACT REPORT

THIS FIRST FERALCO GROUP IMPACT REPORT PROVIDES CUSTOMERS, SUPPLIERS, EMPLOYEES, OWNERS AND OTHER STAKEHOLDERS WITH A TRANSPARENT OVERVIEW OF HOW WE WORK WITH SUSTAINABILITY MATTERS ACROSS THE GROUP, AND HOW WE ARE BUILDING THE STRUCTURES AND DATA NEEDED TO MANAGE AND IMPROVE OUR PERFORMANCE OVER TIME.

The report is structured in two parts to make it useful for different readers. First, we share selected examples from across the Group that illustrate how we work with our material matters within environmental, social and governance topics (ESG). This is followed by a more formal sustainability statement that is based on the European Sustainability Reporting Standards (ESRS). Since this is our first year of structured groupwide sustainability reporting, the statement follows the ESRS logic and definitions.

The report is not subject to statutory sustainability assurance requirements for the reporting period. Consequently, the sustainability information has not been externally assured. The company has nevertheless applied internal review and validation procedures and intends to continue developing its reporting processes, data quality and documentation in preparation for future stakeholder, customer and group-level reporting needs.

Although we are currently out of scope for EU Corporate Sustainability Reporting Directive (CSRD), we believe that transparent sustainability information supports trust, strengthens our relationships and helps us steer the business responsibly. The Feralco Group is owned by Mellby Gård Group, and our financial information is included in Mellby Gård's reporting. From 2027, Mellby Gård will be required to report in accordance with CSRD, and Feralco's sustainability data will be included in that group reporting. We also want to publish a sustainability report of our own, to communicate openly about The Feralco Group's priorities, our work and our progress.

This report is the result of our first year of doing structured sustainability reporting across The Feralco Group. We are grateful for the commitment and collaboration across the organisation to gather and report data that, in many cases, has not been collected consistently before. We see this as a milestone and an important step

towards more robust sustainability management. As our processes mature and data quality improves, some metrics, baselines and focus areas may be refined over time.

In 2025, The Feralco Group received its first Group-level EcoVadis rating, achieving Bronze and establishing an external baseline for continued improvement. Several local Feralco companies have achieved higher EcoVadis scores individually, reflecting stronger maturity in parts of the organisation and providing examples that can support further progress across the Group.

This report provides a strategic overview of the Group's material sustainability impacts, risks and opportunities. The disclosed goals and measures outlined under each topic reflect the Group's current direction and priorities; however, several are still evolving and have not yet been translated into specific, measurable targets or comprehensive performance tracking. As data quality, coverage and methodological consistency continue to improve, disclosures will be further developed in line with regulatory requirements. Detailed topic-specific disclosures are presented in the ESRS-inspired sustainability statement on page 54.

In addition to supporting internal sustainability management, the report aims to provide customers and other stakeholders with relevant information for climate-related assessments, supplier evaluations and responsible procurement decisions. We hope you find this report useful. We welcome questions, comments and input regarding this report as part of our ongoing stakeholder dialogue.

Please contact your regular Feralco contact or the central team at: sustainabilityreporting@feralco.com

VALUE CHAIN STAGES

RAW MATERIAL SOURCING

Procures base chemical inputs and increasingly utilises recycled raw materials to lower its environmental footprint

MANUFACTURING & PRODUCTION

Operates 21 Industrial sites across 8 European countries to synthesise inorganic coagulants and water process chemicals

SUPPLY CHAIN & LOGISTICS

Coordinates localised distribution networks and fossil-free transport options to maintain short lead times and reliable delivery

APPLICATION & B2B SOLUTIONS

Supplies customised chemicals to municipalities (for drinking water and wastewater) and industrial sectors like pulp, paper, food, and beverage

CIRCULAR SERVICES & RESTORATION

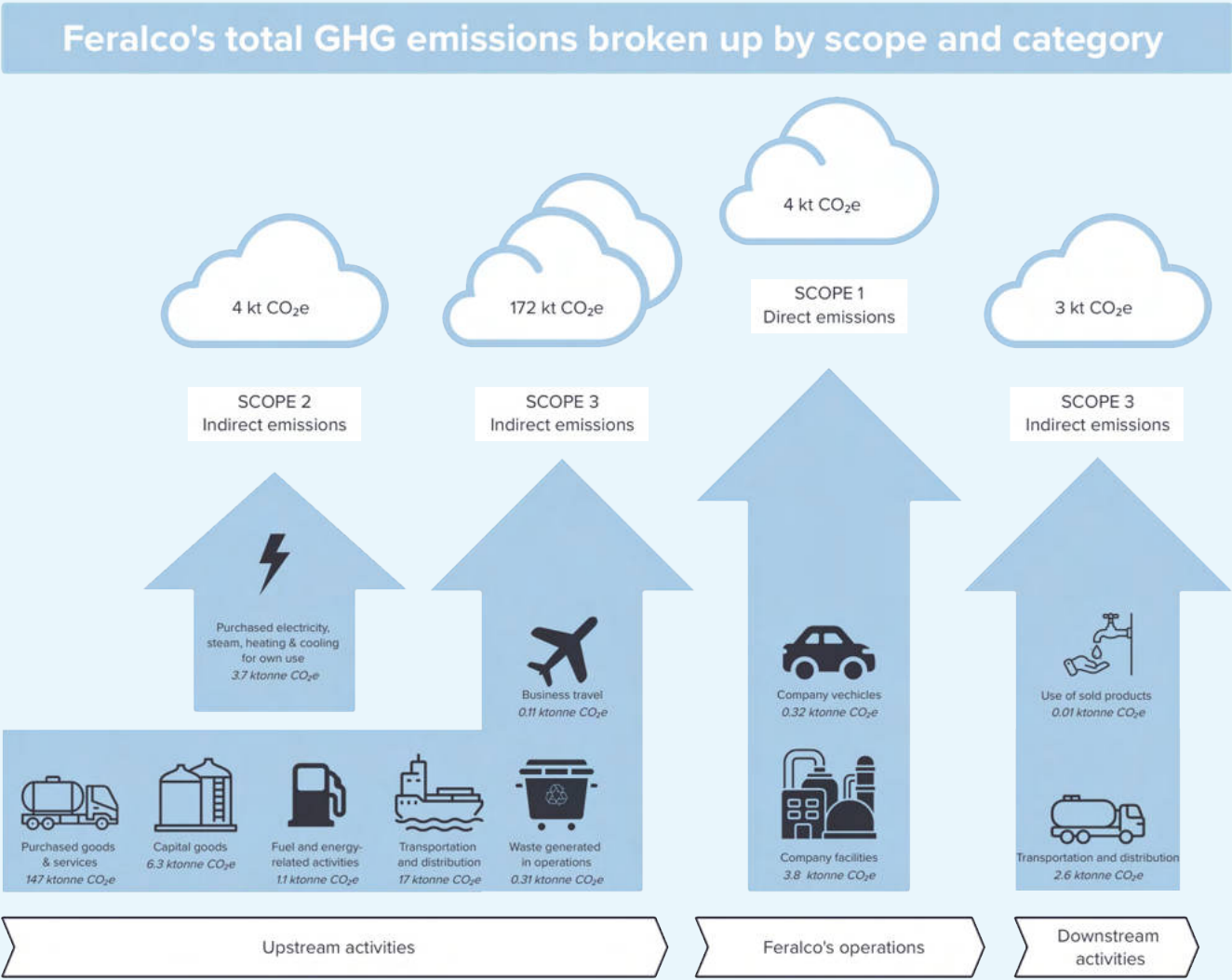
Provides downstream environmental services, such as lake and watercourse restoration via subsidiary operations like Vattenresurs



FERALCO SUSTAINABILITY AT A GLANCE

FIRST GROUP-WIDE SUSTAINABILITY PUBLICATION: The publication of this report marks an important milestone in The Feralco Group’s sustainability journey, bringing together strategy, data and selected examples from across the Group for the first time.

MANAGING OUR ENVIRONMENTAL FOOTPRINT



CARING ABOUT PEOPLE

- **Group safety metrics:** 0 fatalities and 9 recordable work-related accidents reported, with 10 days lost.
Lost Time Injuries Rate, LTIR [LTIR per million hours worked] (2025) 3.9
- **Incidents of discrimination, including harassment reported (2025):** 0
- **Complaints filed through channels for own workers to raise concerns (2025):** 0
- **Severe human rights incidents connected to the work-force reported (2025):** 0
- The Feralco Group reached an **employer net promoter score (eNPS)** of 27 (2025) which is 22 points above the available industry benchmark. The average participation rate (2025) was 59%.

BUILDING TRUST THROUGH GOOD GOVERNANCE

- **Confirmed incidents of corruption or bribery (2025):** 0
- **Whistleblower reports through our whistleblowing system (2025):** 0

Total energy consumption (2025)
30.3 GWh

Renewable share of total energy (2025)
32% and 10 GWh renewable energy

Gross Scope 1 emissions (2025)
4.1 ktonnes CO₂e

Gross Scope 2 emissions (2025)
Location based: 3.0 ktonnes CO₂e
Market based: 3.7 ktonnes CO₂e

Gross Scope 3 emissions (2025)
174 ktonnes CO₂e

Largest Scope 3 category shown
Purchased goods and services 147 ktonnes CO₂e

Total GHG emissions (2025)
Location based: 180 ktonnes CO₂e
Market based: 182 ktonnes CO₂e

Lake restoration by Vattenresurs
Phosphorus reduction of 35 tonnes across an area of 770 hectares

THE FERALCO GROUP CONDUCTED ITS FIRST FULL DOUBLE MATERIALITY ASSESSMENT (DMA) IN 2023, BASED ON THE ESRS.

OUR DOUBLE MATERIALITY ASSESSMENT

THE ASSESSMENT was carried out by a cross-functional team from across the Group with support from an external expert, establishing the basis for the Group's coordinated sustainability work.

For the 2025 reporting year, no new full DMA was carried out. Instead, the 2023 assessment was reviewed and updated through limited amendments based on input from the owner and a more developed understanding of reporting requirements. This was considered sufficient, as the original assessment had already been conducted in line with ESRS and had identified the sustainability matters material to the Group from both an impact and a financial perspective.

The updated assessment reflects current regulatory guidance, updated scoring criteria, and an organisational scope covering the full Feralco Group. The process included several structured digital workshops and two in-person workshops, with particular focus on topics close to the

materiality thresholds. Open questions were addressed through follow-up discussions to support consistent scoring across the Group.

Stakeholder engagement formed an important part of the Double Materiality Assessment. Dialogue with customers, employees, suppliers, owners, authorities and industry partners helps Feralco understand expectations, test assumptions and identify sustainability-related impacts, risks and opportunities. To inform the DMA process, a first stakeholder analysis was conducted during 2022. Although this analysis primarily covered the Nordic business, it highlighted priorities considered relevant across the wider Group, including greenhouse gas reduction, Scope 3 transparency, circular resource use, water management, regulatory compliance, human rights due diligence, governance and product innovation.

The DMA followed a structured methodology aligned with ESRS re-

quirements. Sustainability matters were assessed from two perspectives: impact materiality and financial materiality. Impact materiality covers actual and potential positive and negative impacts on the environment and society, assessed based on scale, scope, irremediability, and likelihood. Financial materiality covers sustainability-related risks and opportunities that could reasonably be expected to affect the Group's financial position, performance, or future development, based on magnitude and likelihood, with reference to Group-level EBIT.

The results of the Double Materiality Assessment are subject to formal validation. Following internal review, the assessment was approved by the CEOs of The Feralco Group and presented to the Board. The Double Materiality Assessment is reviewed regularly and may be updated if significant changes occur in business activities, regulatory requirements or stakeholder expectations.



THE FERALCO GROUP'S SUSTAINABILITY STRATEGY

THE FERALCO GROUP'S SUSTAINABILITY STRATEGY is designed to turn ambition into consistent actions across The Feralco Group and its value chain. Guided by its vision, The Feralco Group aims to strengthen its position in water treatment chemicals by improving performance data, reducing impacts, and upholding responsible business conduct across The Group. It is deliberately set up as one connected system rather than separate initiatives, because progress in one area depends on enabling actions in another.

At the core of the sustainability strategy sits a **Sustainability Performance** focus that unifies Environmental, Social and Governance priorities through a single performance framework. This pillar strengthens trust and accountability by improving the clarity and accessibility of sustainability data and by aligning disclosures with international frameworks such as the ESRS, with formal reporting through Mellby Gård from 2027. Transparency is further supported through third-party assessment via EcoVadis and the build-out of a sustainability dashboard

OUR VISION THE FERALCO GROUP AIMS TO BE EUROPE'S FOREMOST PROVIDER OF SUSTAINABLE WATER TREATMENT CHEMICALS, DELIVERING INNOVATIVE AND SAFE SOLUTIONS THAT DRIVE GROWTH, MINIMIZE ECOLOGICAL IMPACT, AND UPHOLD SOCIAL RESPONSIBILITY AND TRANSPARENT GOVERNANCE THROUGHOUT THE VALUE CHAIN.

that tracks group-level KPIs and disseminates them to the individual companies, with clear ownership and accountability. Sustainability performance is treated as a standing management agenda item, with ultimate responsibility held by the Group CEOs.

The Environmental pillar focuses on preventing and reducing negative impacts across the value chain while linking long-term direction with practical action. The strategy sets a long-term ambition to move towards cradle-to-gate climate neutrality by 2050 and to align climate action with the Paris Agreement. This ambition is not presented as a developed transition plan at this stage; rather, it provides the direction for continued work to strengthen data quality, assess reduction opportunities and develop more detailed abatement plans over time. At the same time, The Feralco Group recognises that most climate impact arises upstream in the raw material supply chain, while improvements in own operations also require a systematic approach that is still evolving. Actions therefore include energy efficiency measures at plants, energy choices, investment decisions on equipment replacement, operational optimisation, and transport efficiency through higher load utilisation and review of transport options. The strategy also includes work on lower-impact raw material streams, recommending products that help reduce climate impact in use, and engaging suppliers and customers to better understand sustainability parameters across the value chain. This must be done without compromising quality or performance requirements and without creating non-viable costs. From 2030, carbon offsetting projects may also be considered in the longer term for residual emissions that are difficult to reduce, as a complement to, not a substitute for, actual decarbonisation. Feralco prioritises direct emission reductions and value-chain improvements.

Circularity is treated as a multiplier: the Circular Economy action area aims to reduce the use of virgin materials and, through that, reduce footprints such as climate impacts and water use while supporting resilience. The Feralco Group strives to increase recycled material in production, partner with customers to design recyclable chemical solutions, engage stakeholders on circular material flows beyond the traditional water treatment industry, and follow developments in circular technologies that can open new raw material streams or new uses of products.

The Social pillar focuses on fostering a safe, inclusive and engaging workplace committed to diversity and

equal opportunity, while also meeting expectations on product safety and compliance. Actions include annual employee surveys, developing employees for future demands, and covering workplace health and wellness through physical, mental and emotional wellbeing. These measures strengthen the organisation's capacity to deliver operational excellence and sustain environmental improvements.

The Governance pillar focuses on operating with integrity and consistency. It emphasises transparent and ethical conduct, supplier compliance with sustainability standards, and the use of recognised frameworks for reporting as part of good business governance. Actions include digitalising supply chain monitoring for improved ESG compliance, engaging in dialogue with stakeholders that do not uphold company values or ignore legal guidelines to support and guide them in the improvement process; and adapting and monitoring adherence to Codes of Conduct for both internal teams and external partners.

The strategy is set up to work across the entire group. Group-level sustainability leadership is held by key executives and the Circularity Manager, while each legal entity is managed by its Managing Director.

Progress is monitored through a centralised reporting system to deliver an annual report. Employee engagement is internally supported via stakeholder forums and employee reviews. Prioritised KPIs and targets are reviewed annually by the Group management team and will be supported by detailed group-wide policies for the Environmental, Social and Governance areas.

In this way, the sustainability strategy acts as a steering wheel for The Feralco Group: helping the business stay on track, navigate a fast-moving sustainability landscape and translate priorities into practical direction. It connects measurement, management and improvement by linking the data needed to understand performance with the governance needed to steer decisions and the actions needed to reduce impacts over time. Data and governance provide the backbone for credibility and compliance; operational levers reduce impacts where The Feralco Group has direct control; and value chain collaboration addresses the largest footprint drivers upstream. This logic ties the pillars together and turns sustainability priorities into a coherent path for performance, compliance and business growth across the Group.

CIRCULARITY IS TREATED AS A MULTIPLIER



ENVIRONMENTAL INFORMATION

MANAGING OUR ENVIRONMENTAL IMPACT

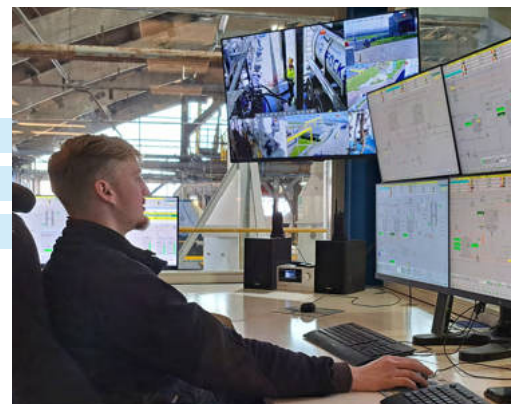
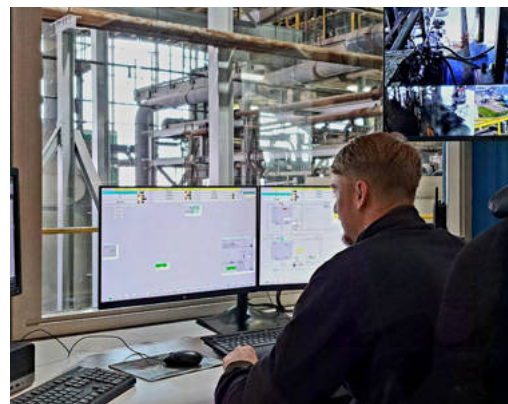
THIS SECTION EXPLAINS HOW THE FERALCO GROUP WORKS WITH ENVIRONMENTAL PERFORMANCE ACROSS THE GROUP – COVERING CLIMATE CHANGE, POLLUTION PREVENTION, BIODIVERSITY AND ECOSYSTEMS, AND RESOURCE USE AND THE CIRCULAR ECONOMY.

We are at a point where we have started by building reliable, consistent data, and will go forward translating those insights into practical actions that can be repeated and scaled across sites and countries.

On climate, we measure energy use and the associated greenhouse gas (GHG) footprint across electricity, natural gas, fuels, and process-related heat, steam and cooling, and we review this regularly through operational excellence routines across the manufacturing sites. We also recognise the value chain reality: key impacts sit both in our own operations and upstream activities, which is why we combine operational improvements with a clear focus on circular inputs and responsible sourcing. Evidently the control on the contribution from the own operation is open for more direct influ-

ence, whilst the upstream contribution, specifically the raw materials, are larger but also somewhat more difficult to influence. Pollution risks are managed through permits and compliance, supported by control programmes, training, inspections, planned maintenance, and monitoring of relevant air and water parameters.

This report recognises both The Feralco Group's own operational impacts and the environmental contribution its products can enable in customer applications. Operational impacts relate to production, energy use, emissions, waste and compliance, while product-enabled contributions refer to how the Group's treatment chemicals support customers in achieving water quality, pollution reduction and regulatory performance.



Understanding environmental performance starts with understanding the production process. Continuous monitoring helps identify opportunities to improve efficiency, reduce emissions and support responsible operations.

ENVIRONMENTAL HIGHLIGHTS

E1 CLIMATE AND ENERGY

- **Data foundation:** Energy and carbon footprint data are captured across sites and reviewed through a sustainability reporting platform, supported by operational excellence routines.
- **Renewable energy share:** Renewables accounted for 32% of the total energy consumption.
- **Renewable energy volume:** Total renewable energy consumption was 10 GWh.
- **Onsite renewables and alternative fuels:** Solar power and renewable fuels are used where feasible, including site-level solar generation and the use of bio-based fuels.

E2 POLLUTION PREVENTION

- **Pollution risk management:** Chemical inventories, substance reviews, permit monitoring, safe handling routines, spill prevention, incident follow-up and employee training support pollution risk control across operations.
- **Product-enabled contribution:** Feralco's products help customers prevent pollution through effective wastewater treatment, including reduction of phosphorus and other pollutant loads to receiving waters.
- **SVHC control:** Products are monitored against REACH requirements and do not contain substances on the SVHC Candidate List or in Annex XIV above the 0.1% w/w threshold.
- **Permit compliance:** Operations are managed in line with local environmental permits, with the aim of maintaining compliance and, where feasible, operating below required emission limits.
- **Local impact example:** Ibbenbüren reported zero process-based waste in 2024 and 2025, relative to around 50 000 tonnes of annual output. Read more in the Pollution chapter.

E3 WATER MANAGEMENT AND MARINE RESOURCES

- **Water as a core business focus:** While not identified as a material topic in the double materiality assessment, water remains central to Feralco Group's business and customer value.
- **Responsible water management in own operations:** The Group monitors water use and discharge, with several sites implementing optimisation, reuse, and closed-loop solutions to reduce wastewater and limit pressure on local water resources.
- **Product-enabled impact on water quality:** The Group's treatment chemicals support drinking water purification, municipal and industrial wastewater treatment, and industrial effluent treatment, helping customers meet water-quality and regulatory requirements.

E4 BIODIVERSITY AND ECOSYSTEMS

- **Core contribution:** Feralco's products help customers remove impurities from wastewater, including phosphorus compounds that might otherwise enter rivers, lakes and wetlands. By supporting effective wastewater treatment, our products can contribute to improved water quality and may also support restoration efforts in certain contexts.
- **Lake restoration projects:** Quantified results reported include a 35 tonnes phosphorus reduction across 770 hectares in 2025, using a technology with aluminium precipitation to reduce the internal phosphorus loading in aquatic ecosystems.

E5 RESOURCE USE AND CIRCULAR ECONOMY

- **Recycling business as part of Feralco:** The Feralco Group units Eco 92 and Gesitma work with upcycling residual chemical streams, which otherwise would become waste, to functional coagulants.
- **Circular and secondary materials in inflows:** In 2025, the Group's reported total material inflow was 623 ktonnes, mainly inorganic material used to produce coagulants.
 - ▷ Using a wide circular economy definition, 71% of Feralco's raw materials used for manufacturing of inorganic coagulants were by-products or recycled materials.
 - ▷ Reported secondary materials amounted to 11.4 ktonnes, or about 1.8% of total incoming material weight, excluding upcycling businesses where volumes can be almost fully based on secondary raw materials.
- **Hazardous waste:** Hazardous waste totalled 2.4 ktonnes in 2025, representing most of the Group's 2.8 ktonnes of total waste. The hazardous waste consisted mainly of inorganic material containing acidic metal hydroxides.
- **Waste data reliability:** Waste quantities are measured primarily at contractors' weighbridges and evidenced through transfer notes and annual returns; hazardous waste is tracked end to end with documentation and EWC (European Waste Catalogue) codes.
- **Circular operations support:** Group companies provide waste management services and, where feasible, run returnable container loops to keep packaging in circulation.



CLIMATE CHANGE

GOALS	MEASURES
Establish a reliable base for data collection from which to further derive strategies.	To establish a reliable base for data collection from which to further derive strategies, The Feralco Group is measuring energy use and its carbon footprint across all sites. This covers electricity for equipment such as heating systems, pumps, and cranes; natural gas and fuels mainly for heat and vehicles; and heat, steam, and cooling to run and control production processes. In addition to internal data collection, the Feralco Group is working to develop processes for gathering relevant sustainability information from suppliers, supporting improved transparency, more robust calculations and better-informed sustainability strategies. The data is reported quarterly through a reporting platform, to ensure it is consistent and ready to inform the next steps.
Implement measures to reduce emissions in own operations and upstream supply chain.	The Feralco Group is implementing measures to reduce emissions in its own operations and upstream supply chain, particularly in relation to raw materials and transport. This includes shifting outsourced logistics towards lower-fossil transport options where feasible, improving transport planning and load utilisation with dedicated partners, and considering lower-carbon raw material options where quality, availability and cost allow. Although 2025 serves as the base year, some measures to reduce emissions have already been implemented. For example, at the German site in Ibbenbüren, two cooling systems have been replaced with one centralised system, reducing both the number of pumps and electricity consumption, while also lowering the risk of emissions from refrigeration and process cooling equipment.

GOALS	MEASURES
Improvement of energy efficiency and use of renewable technologies.	To deliver the improvement of energy efficiency and use of renewable technologies, The Feralco Group focuses on using solar panels, switching to renewable energy, and increasing the use of biofuels where this is technically and economically feasible. Throughout the company this is driven through a systematic operational excellence benchmarking programme where energy consumption is measured. The shift to renewable energy is more a matter of local conditions and market opportunities. Some examples are: ▷ At Feralco in Sweden, production plants already use bio-based fuels for heating in the processes and also benefit from the high share of fossil-free electricity in Sweden. ▷ In several Feralco sites, e.g. in the Netherlands, Switzerland, Italy and Spain, solar panels are used to generate electricity. Further expansions are assessed against investment requirements and site-specific constraints.
Clarify Scope 1, 2 and 3 GHG reduction targets during 2026, with a 2035 reduction pathway currently indicated at 20–40% from a 2025 base year, supported by transition plans.	During 2025 the ISO 50001 Energy management standard has been implemented in the Alegia site in Spain. Develop Scope 1, 2 and 3 abatement plans during 2026 at the appropriate level of detail, including country, production site and Group level. The plans will be based on 2025 data and will define transition actions to support the 2035 reduction pathway and the Group's longer-term climate neutrality ambition for 2050.

Feralco's approach to climate change mitigation focuses on making practical, cost-efficient improvements that reduce emissions where The Group has direct influence, while building a reliable data basis to steer decisions. A central priority is to quantify energy use and greenhouse gas emissions in a consistent way because accurate data is needed to manage performance, track progress, and select the most effective activities. Based on this information, The Feralco Group prioritises measures that are feasible and cost-efficient, including reducing fossil energy use within plants through different technical and operational measures and improving transport, logistics and sourcing practices to lower emissions linked to distribution and procurement.

The Group also recognises that a significant share of the carbon footprint occurs upstream in the value chain, driven largely by raw materials and the production of purchased chemicals. The Feralco Group has a well-developed understanding of the footprint drivers of its key inputs, but the ability to reduce these emissions depends partly on supplier actions and market conditions. As a result, the approach combines internal reduction measures with supplier engagement and informed purchasing decisions while acknowledging limitations where supplier choices are constrained and where willingness to pay for lower carbon alternatives affects what can be implemented in practice.

GETTING STARTED WITH DATA COLLECTION

During 2025, The Feralco Group made significant efforts to strengthen the measurement of carbon footprint data across the Group. A shared reporting platform was implemented, and additional functions that had not previously been involved were engaged in the data collection and reporting process. While this required substantial effort, it resulted in the establishment of more consistent and structured GHG Protocol aligned carbon accounting processes across The Feralco Group. These processes establish a baseline for continued development of carbon footprint measurement at Group level. Feralco is strengthening The Group's data foundation by systematically reviewing energy use across sites and energy carriers, including electricity, natural gas and fuels, as well as heat, steam and cooling.

INCREASING THE SHARE OF RENEWABLE ENERGY

Across the Group, Feralco is increasing the use of renewable energy through a mix of on-site generation and renewable fuels where feasible. For example, at Feralco in the Netherlands, solar power has been in place since 2018, generating around 4 MWh during the reporting period and covering 3.6 MWh of electricity use, while further expansion is assessed against barriers such as investment needs, roof design constraints and exposure to a salty environment that can accelerate panel degradation. In Italy, a photovoltaic system was installed during 2025 at the Millesimo site, with a generation capacity of approximately 250 MWh of renewable energy per year. In Spain, two out of four production plants are equipped with solar panels, a third plant plans to install panels in 2026.

Feralco Nordic's main transporter in Sweden uses Neste MY Renewable Diesel (HVO100) for deliveries. During the reporting period, fuel use in this transport set-up totalled 409 449 litres, of which 405 577 litres, or 99.1 %, was HVO100. The remaining 3 872 litres, or 0.9 %, was Miles BIO diesel used for temporary support refuelling when HVO100 was not available nearby. HVO100 is based on 100 % renewable raw materials and can considerably reduce greenhouse gas emissions compared with fossil diesel, but availability at fuel stations and higher cost remain implementation challenges. Feralco Nordic is also working with other transport partners to explore fossil-free fuel alternatives for routes within Sweden and to and from Norway, Denmark and Finland.

TACKLING SCOPE 3 EMISSIONS FROM RAW MATERIALS AND TRANSPORTATION

The most significant share of The Feralco Group's greenhouse gas footprint occurs upstream in the value chain, driven primarily by raw materials and outsourced transportation.

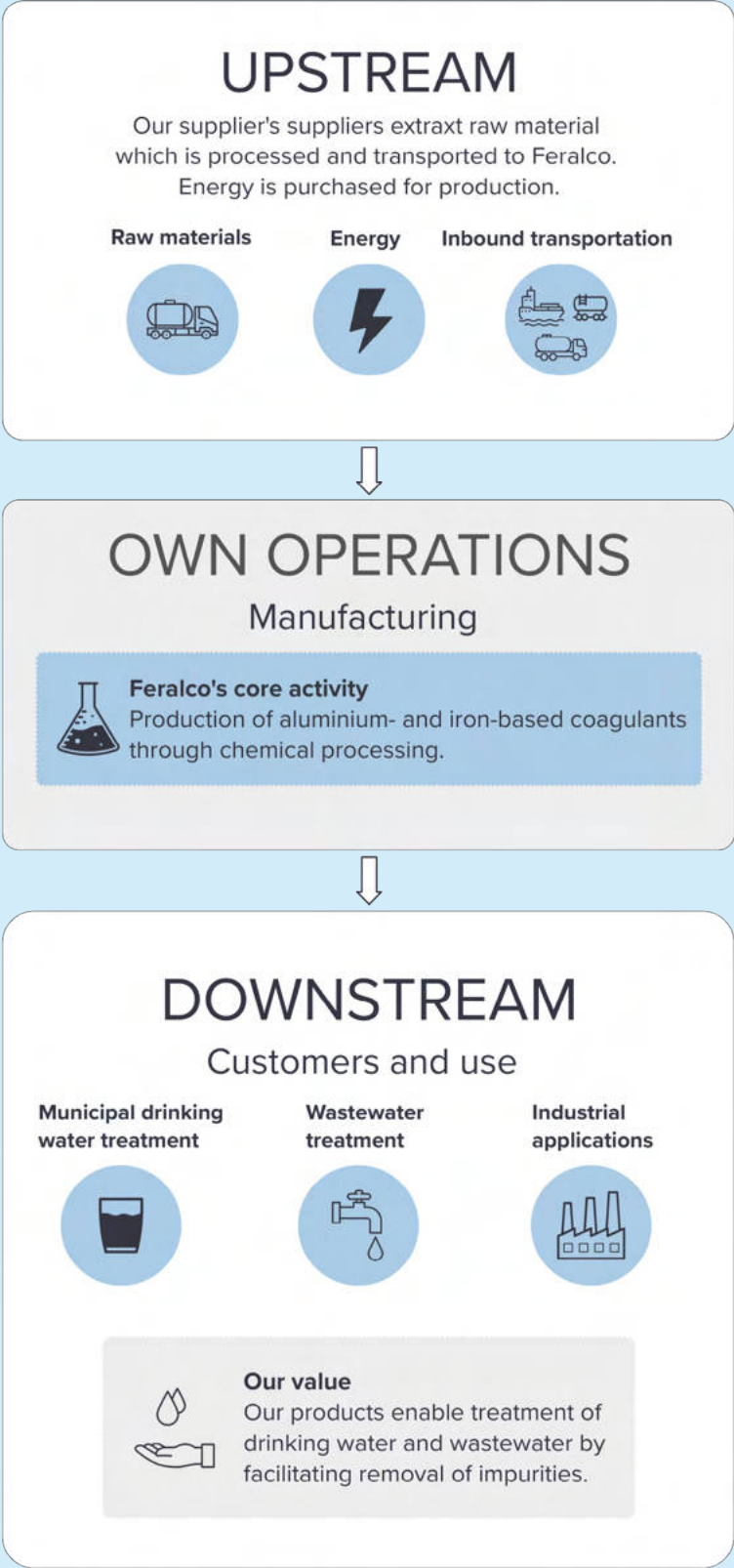
- Achieving material reductions in raw-material emissions requires balancing climate considerations with product performance and quality requirements, security of supply, and cost. While lower-carbon alternatives exist for certain inputs, they often entail significantly higher costs and are not yet widely available at the required scale. Customer willingness to pay a premium for lower-carbon products has so far been limited, which constrains the pace of change. As a result, reducing emissions from raw materials remains a complex, longer-term challenge.
- To reduce transport-related emissions, logistics are continuously optimised in collaboration with dedicated partners. Road transport represents the largest share of emissions for both inbound raw materials and outbound deliveries. Optimisation is currently driven mainly by cost and supported by a set of planning tools rather than a single global system. Key constraints include high volumes, just-in-time delivery requirements, cost pressure and the handling of hazardous goods. Nevertheless, The Feralco Group works with partners to improve planning, load utilisation and consolidation where feasible. Decarbonising transport options is part of the Group's purchasing strategy, but higher costs remain a key barrier. In the Nordics, most road transport is already carried out using bio-based fuel (HVO100), and similar solutions are being evaluated in other parts of the business.

PRODUCT-ENABLED ENVIRONMENTAL CONTRIBUTION

In certain wastewater treatment configurations, chemical treatment with inorganic coagulants can support climate-related objectives by reducing the need for energy-intensive biological processes or by improving treatment efficiency. The climate benefit depends on site-specific conditions, treatment requirements and life-cycle boundaries, and should therefore be assessed in relation to the full treatment system.



THE FERALCO GROUP'S VALUE CHAIN
Feralco produces and delivers aluminium- and iron-based coagulants for water treatment and industrial applications.



POLLUTION

GOALS

► **Maintain compliance with regulatory, legal and permit requirements while minimising pollution risks through active chemical management.**

.....
► **Proactively ensure no substances of very high concern (SVHC) is used in the Feralco Group.**

MEASURES

Monitor regulatory developments, maintain chemical inventories, review substances of concern, monitor permit compliance, ensure safe handling and storage, prevent spills through inspections and maintenance, and investigate incidents and near misses with corrective actions. Provide relevant employee training in chemical handling, spill response and environmental requirements.

.....
► The Feralco Group neither uses substances of very high concern (SVHC) nor do we intentionally manufacture or deliberately apply the substances in our production processes.

The REACH Candidate List is continuously monitored, and substitution alternatives are assessed should a listed substance ever become relevant, with the objective of avoiding SVHC use wherever possible.

The Feralco Group's approach to pollution prevention relies on two practical measures: helping customers reduce pollution through its products and controlling pollution risks in its own operations through robust routines. A key focus area is reducing pollution through wastewater recycling, supported by process controls designed to minimise releases to water. As chemical operations can involve substances of concern, The Feralco Group manages these risks by complying with applicable laws, environmental permits and best available techniques. Employees are trained to work safely, while control programmes, regular inspections and planned maintenance help keep equipment and processes in a safe condition and reduce the likelihood of pollution-related incidents. To support a reliable and verifiable approach, The Feralco Group monitors relevant parameters in air emissions and wastewater discharges to track performance and demonstrate compliance over time. These parameters may include, for example, the concentration of hydrochloric acid in air emissions and wastewater.



HOW FERALCO'S PRODUCTS HELP PREVENT POLLUTION

Through its products, The Feralco Group helps prevent pollution by providing essential chemicals for drinking water and wastewater treatment that support reliable water quality. In practical terms, flocculants improve water treatment by neutralising the electrical charges of small particles that would otherwise stay dispersed, so they combine into larger clumps called flocs. These flocs are much easier to remove, which makes the cleaning process more efficient and helps bind impurities so they can be separated from the water. At The Feralco Group, products are tailored to individual customer requirements and supported through technical expertise delivered in joint projects with customers. This approach helps customers run stable treatment processes and reduce the amount of impurities that remain in treated water.

BUILDINGS AND SOIL

In operations, preventing contamination and the spread of harmful substances is a key priority. Chemicals are handled in designated areas and spill containment measures are in place. Where relevant, these areas are bunded so that any spills can be contained and collected.

Some of The Feralco Group's sites are located on former industrial land, in some cases dating back to periods when environmental controls were less stringent. This requires additional consideration when making changes on site. At several locations, the company participates in projects aimed at identifying and remediating historical contamination. For example, at Feralco's Basse Indre plant, a multi-year project is underway to remediate legacy contamination. In Italy, the Millesimo and Livorno sites have completed the removal and remediation of asbestos roofing during 2025, delivering a significant improvement for both environmental protection and worker safety. At the Livorno site, 800 m² of asbestos roofing were removed.

In coagulant manufacturing processes, highly corrosive chemicals – such as sulphuric acid – are used. To ensure both the safety of people, and to prevent unintended leaks from equipment, The Feralco Group uses fluoropolymer materials in relevant applications. In recent years, PFAS-containing waste streams (e.g., certain packaging and liner materials)



have been segregated and stored separately from other waste as a precautionary measure to avoid uncontrolled handling resulting in PFAS pollution. Volumes are limited, but as established recycling pathways and widely available destruction solutions are currently lacking, the material is stored pending the availability of appropriate treatment options.

FROM MANUFACTURING WASTE TO RESOURCE

A few examples of how The Feralco Group reduces local pollution risks and improves resource efficiency include:

- **Germany:** At Feralco in Germany, aluminium hydroxide sludges are reused at the Ibbenbüren site, reducing the need for primary raw materials and avoiding cost-intensive treatment or incineration. The material is transported by truck and stored safely on site in a bunker complex.
- **Sweden:** Closed loop plant concepts are used to capture, treat and recirculate effluents and by-products on site, reducing discharges and enabling reuse of recovered materials. Fully closed loops are, however, limited by factors such as energy demand, water balance and residual waste streams.

Closing loops to reduce local impacts – An example from Ibbenbüren

In Germany, the “Closed Loops IBB” project aims to use resources in a sustainable and economical way while reducing negative environmental impacts from emissions and waste at Feralco’s Ibbenbüren site. The project is designed to bring production-related waste and wastewater close to zero, supporting a cleaner local environment and reducing pressure on local water systems. A key result is that in 2024 and 2025 there was zero process-based waste from production, compared to an annual output of around 50 000 tonnes of product. Closed loop solutions also support local communities by lowering water consumption, avoiding wastewater discharge from production and enabling reuse of production related waste streams. Together, this reduces the need for external disposal and lowers the risk of environmental impacts in the surrounding area.

WATER MANAGEMENT AND WATER TREATMENT CONTRIBUTION

GOALS	MEASURES
Strengthen responsible water management across operations while supporting customers in achieving effective water and wastewater treatment through reliable treatment solutions.	As part of the continued development of sustainability reporting, Feralco aims to improve the collection and analysis of water-related data across relevant sites, including water withdrawal, discharge and water-related risks where material.
Strengthen resilience across water supply and treatment systems.	Maintain reliable supply chains for essential water treatment solutions and support secure access to water through active participation in relevant industry and public-private forums. For example, Feralco Nordic is a member of the Swedish VAPOS (VA Privat-offentlig samverkan), which brings together public and private water stakeholders to strengthen supply security during unforeseen or geopolitical disruptions.

Although water-related impacts, risks and opportunities did not reach the materiality threshold in the double materiality assessment, water remains central to Feralco’s business identity and customer value. For this reason, we include a section on our impacts related to water here.

The Group aims to manage water responsibly in its own activities while providing treatment chemicals that support customers in drinking water purification, wastewater treatment, industrial effluent treatment and compliance with water-quality requirements.

OWN OPERATIONS

In its own operations, Feralco focuses on responsible water management by monitoring water withdrawal, consumption, discharge and production wastewater where relevant. Several sites work with water-risk awareness, process optimisation, reuse and closed-loop solutions to reduce wastewater volumes and limit pressure on local water resources. The Group-level water management including data collection methods and consolidation is currently being refined.

PRODUCT-ENABLED CONTRIBUTION

Feralco’s main water-related contribution is enabled through its products. The Group’s treatment chemicals support drinking water purification, municipal and industrial wastewater treatment, phosphorus removal, industrial effluent treatment and, where applicable, water reuse and recycling. These applications help customers meet water-quality and compliance requirements while supporting reliable and resilient water treatment systems.

BIODIVERSITY & ECOSYSTEMS

GOALS

Support ecosystem restoration.

MEASURES

The Feralco Group supports ecosystem protection by enabling effective wastewater treatment that helps reduce pollutants, such as phosphorus, entering rivers and lakes and thereby improves water quality. This includes solutions that support the efficient removal of impurities and help protect aquatic ecosystems on which communities and nature depend. Feralco has recently invested in additional ferric sulphate production capacity in the UK and the Netherlands, supporting local access to products used in wastewater treatment and helping companies meet stricter phosphorus discharge limits. In addition, The Feralco Group supports lake restoration through its subsidiary Vattenresurs, linking practical action to the recovery of nearby aquatic habitats and species.

THE FERALCO GROUP'S APPROACH TO BIODIVERSITY AND ECOSYSTEMS

is closely linked to its core business of providing water treatment chemicals, which supports the protection of aquatic ecosystems and natural water resources. By enabling effective wastewater treatment, The Feralco Group supports efficient protection of ecosystems by helping to reduce the load of impurities that would otherwise enter rivers, lakes or wetlands. This contribution also supports restoration efforts in different contexts, for example where improved water quality and controlled discharges help stabilise or recover wetlands and lake ecosystems over time. In addition, local initiatives can focus on ecological restoration and the protection of local species, connecting practical action to the needs of nearby habitats. Overall, the approach combines ecosystem protection through core products and

services with targeted support for restoration projects aligned with local environmental priorities.

Feralco, like other members of the European Inorganic Coagulants Producers Association (INCOPA), welcomes the revised EU Urban Wastewater Treatment Directive (UWWTD) and its more ambitious phosphorus emission limits and energy neutrality objective. Under the revised directive, tertiary treatment for phosphorus and nitrogen removal will become mandatory for urban wastewater treatment plants serving 150 000 population equivalents or more, regardless of whether they discharge into areas sensitive to eutrophication. INCOPA and its members have assessed that the industry has sufficient overall manufacturing capacity to support the increased phosphorus control required by the revised UWWTD. We also welcome the stricter phosphorus

limits of 0.5 mg P/litre for large urban wastewater treatment plants and 0.7 mg P/litre for medium-sized plants. These measures are expected to improve the ecological status of the receiving water bodies, which in turn can support biodiversity, and enable circular solutions for phosphorus.

Beyond the core business of providing wastewater treatment, The Feralco Group's subsidiary Vattenresurs actively restores water bodies where the phosphorus content is causing eutrophication resulting in extensive algal blooms and reduced biodiversity.

The Group is further interested in supporting other types of ecosystem restoration projects.

READ MORE AT
WWW.INCOPA.ORG

incopa

CONTRIBUTION TO WATER QUALITY AND ECOSYSTEM PROTECTION THROUGH CORE BUSINESS SOLUTIONS

The Feralco Group's contribution to biodiversity and ecosystems is closely linked to its core business, because wastewater treatment products can support cleaner water bodies and healthier aquatic habitats. Typical examples are lake restoration projects for eutrophicated water bodies, where treatment helps reduce excess nutrients and improve water quality. These projects connect directly to the business model because they rely on the same underlying chemical reaction and the same type of polyaluminium chloride (PAC) used in wastewater treatment applications. Where feasible, The Feralco Group works with partners to plan and deliver these restoration activities effectively.

RESTORING LAKES IN SWEDEN – VATTENRESURS

The Feralco Group supports improved aquatic ecosystem health through site-specific work in lakes and watercourses, with a focus on eutrophic environments where better water quality can help strengthen biodiversity over time. The Feralco Group's subsidiary Vattenresurs uses Ekobentik technology, based on aluminium treatment of lake sediments, a safe and cost-efficient method for mitigating eutrophication caused by excessive phosphorus inputs from sources such as wastewater and agriculture. Scientific studies, for example the report 2023:03 from Swedish Agency for Marine and Water Management(HAV), the show

that this approach is highly effective in reducing internal phosphorus loading, supporting biodiversity recovery and creating long-term value for both nature and society.

During 2025, restoration projects in Sweden included water bodies such as Riddarfjärden, Årstaviken, Stora Måsnaren, Kyrkviken, Jönköpings deponi and Hönsan. The key method used was aluminium precipitation of phosphorus in the bottom sediment of the lakes to reduce internal phosphorus loading. Quantified results reported for these projects include a phosphorus reduction of 35 tonnes across an area of 770 hectares (six lakes).



RESOURCE USE AND CIRCULAR ECONOMY

GOALS	MEASURES
Quantify recycled materials and by-products, replacing virgin materials.	To quantify recycled materials and by-products and to replace virgin materials, The Feralco Group is building a reliable baseline by measuring how much secondary raw material and by-product input is used and how much waste is generated across operations. This creates a clear starting point to see where virgin materials can be replaced and where waste prevention and reuse measures can have the greatest effect. The baseline will be used to set priorities, track progress over time, and support consistent reporting across the Group. More information can be found on page 78.
Reduction wastewater per tonne.	We reduce our own wastewater volumes by optimising production processes so that less water is needed. This includes improving process efficiency through targeted optimisation steps, as well as actions to promote recycling and waste reduction in order to keep materials and water in use for longer, where feasible. Together, these measures help lower wastewater volumes per tonne of product and support continuous improvement across sites.
Replacing raw materials with recycled materials or by-products.	To replace raw materials with recycled materials or by-products, The Feralco Group works to improve circularity by prioritising options such as reuse and recycling so that fewer virgin raw materials are needed. This means identifying where recycled materials or by-products can technically replace primary inputs and then building the routines to apply these options consistently. In parallel, The Feralco Group seeks suppliers with strong sustainability performance and builds longer-term relationships to secure reliable access to suitable secondary materials.
Develop and advance circular economy projects that improve resource efficiency, reduce waste and support the use of residual streams, recovered materials or alternative raw materials where technically, economically and environmentally feasible.	During 2025 we ran several circular projects in parallel, as The Feralco Group continuously searches to improve in the circularity area. The projects focus on practical outcomes such as improved raw material sourcing, phosphorus recovery, lower CO ₂ impacts and increased use of secondary materials. This means each project has a clear purpose, but all are guided by the same direction: keeping materials in use for longer and reducing waste and emissions, where feasible. The Group stays open to new inputs and opportunities, actively looking for additional circular feedstocks, partners and ideas to strengthen and expand the pipeline of circular projects.

CIRCULARITY AT FERALCO – OUR MULTIPLIER TO SUSTAINABILITY

Circularity is material to The Feralco Group and is a key part of how we develop the business. Our aim is to apply circular economy approaches without compromising product quality, performance or compliance.

Circularity is already reflected in several parts of the business, with more initiatives under development. This includes alternative raw materials, circular partnerships, recycling-focused business units and complementary operations. The drivers include cost, resilience, access to raw materials and higher value from existing material streams, while also supporting decarbonisation by moving materials up the R-hierarchy (the priority order from refuse and reduce through to recycling and recovery) where feasible and credible.

Some of our most established circular activities are carried out through recycling-focused businesses. Eco 92 in Italy and Gesitma in Spain upgrade selected industrial residue streams into coagulants for wastewater treatment. In Vetlanda, Sweden, polyaluminium chloride has been produced since 1982 using secondary aluminium streams, including for drinking water coagulants. In parallel, site-level projects help reduce internal waste through better yield, process stability and handling of production residuals. In the UK, two circular activities illustrate this approach. Approximately 3 ktonnes per year of waste aluminium chloride are used in Pluspac products, keeping the material in productive use rather than treating it as waste. In addition, Feralco UK currently recycles around 2 ktonnes per year

of waste sulphuric. The volume is expected to increase to approximately 4 ktonnes per year with significant investment planned to achieve this.

Progress is not without constraints. Availability, consistency and cost can limit circular solutions, especially in specification-driven applications such as drinking water coagulants, where active content and impurity control are critical to performance and regulatory acceptance.

The Feralco Group also operates within highly integrated chemical value chains for key inputs such as acids and metal salts. These systems often use co-products and by-products efficiently, which supports scale, cost and quality, but can also make raw material flows harder to reshape quickly. We therefore expand circular options where there is a sound technical and commercial pathway.

We also improve circularity through everyday operational levers such as transport efficiency, including full loads and return freight. Our polymer business contributes by improving separation and sludge dewatering, which can reduce overall chemical use and extend the value of coagulants. Downstream, we continue to assess opportunities for metal recycling and phosphorus recovery. Metal recycling into standard coagulants remains commercially challenging, while phosphorus recovery is supported by a stronger resource case, including the EU classification of phosphate rock and phosphorus as Critical Raw Materials. We monitor these developments closely and partner where implementation pathways are clear.

▲
PROGRESS IS NOT WITHOUT CONSTRAINTS
▼

PRODUCT = Intentionally produced as the main output

BY-PRODUCT = Generated alongside the main product and used directly

SECONDARY MATERIAL = Recovered from waste and reused as a raw material

RESOURCE USE AND CIRCULAR ECONOMY

Circular economy is a broad area and is not restricted to recycling waste only. In our case, a large share of the raw materials we use are by-products from different chemical processes, such as oil refineries, fertiliser production and PVC manufacturing.

Based on this broad definition, more than two-thirds of coagulants are made from circular raw materials. Most of this circularity is found in acids, such as hydrochloric acid and sulphuric acid, which are well-defined and pure commodities. To increase the circularity rate, the Group is looking to extend the use of recycled and secondary materials. These may include acids or metal oxides, but the challenge is to find adequate volumes of concentrated and pure material.

At present, the circularity ratio, defined as the mass ratio of raw materials purchased for manufacturing of coagulants which are related to circular economy (i.e. recycled or by-products) versus the total amount of materials purchased for manufacturing of coagulants is 71 % for coagulants (water not accounted). This ratio will be subject to refinement. The amount of secondary raw materials (re-

cycled) used in the conventional coagulant business is low, at about 2 %. However, in the Eco 92 business in Italy and the Gesitma business in Spain, secondary raw materials represent the absolute majority of raw materials. These businesses are almost fully built on end-of-waste volumes and secondary raw materials. In Eco 92, the share of secondary raw materials is about 96 %.

RESOURCE EFFICIENT PRODUCT BY USE OF CIRCULAR SOLUTIONS

At Feralco, many products use secondary inputs such as aluminium hydroxide sludges, helping to reduce the need for primary raw materials while avoiding disposal routes like treatment or burning, with quality and consistency ensured through standard finished goods inspection.

Several plants recover water from process and production areas, creating closed-loop systems with zero or near-zero water effluent. In Sweden, this includes 100 %

reuse of process wastewater in Vetlanda and reuse of scrubber water in Sölvesborg. Similar approaches are applied at other sites, where they help reduce effluent volumes to zero or near zero where technically feasible.

Several plants recover and recirculate water from process and production areas, reducing process wastewater discharges and supporting closed-loop operation where technically feasible. In Sweden for example, the Vetlanda site operates without process wastewater discharge, although a small residual stream is sent to an external waste contractor. Similar approaches are applied at other sites to reduce effluent volumes and manage water streams in line with local technical and permit conditions.

Another case of these circular solutions is found at Feralco in France. Our industrial site producing coagulant is using an aluminium by-product coming from an industrial producer close to our facilities (40 km). This industrial neighbour, which is our partner for almost 15 years, produce electronic capacitors based on pure aluminium metal. Their production is generating effluents that we are blending with our own production to create new coagulant for wastewater treatment. This product has properties which are useful to enhance the performance of biological sewage process for example by fighting against filamentous bacteria.

CIRCULAR USE OF RAINWATER IN OPERATIONS

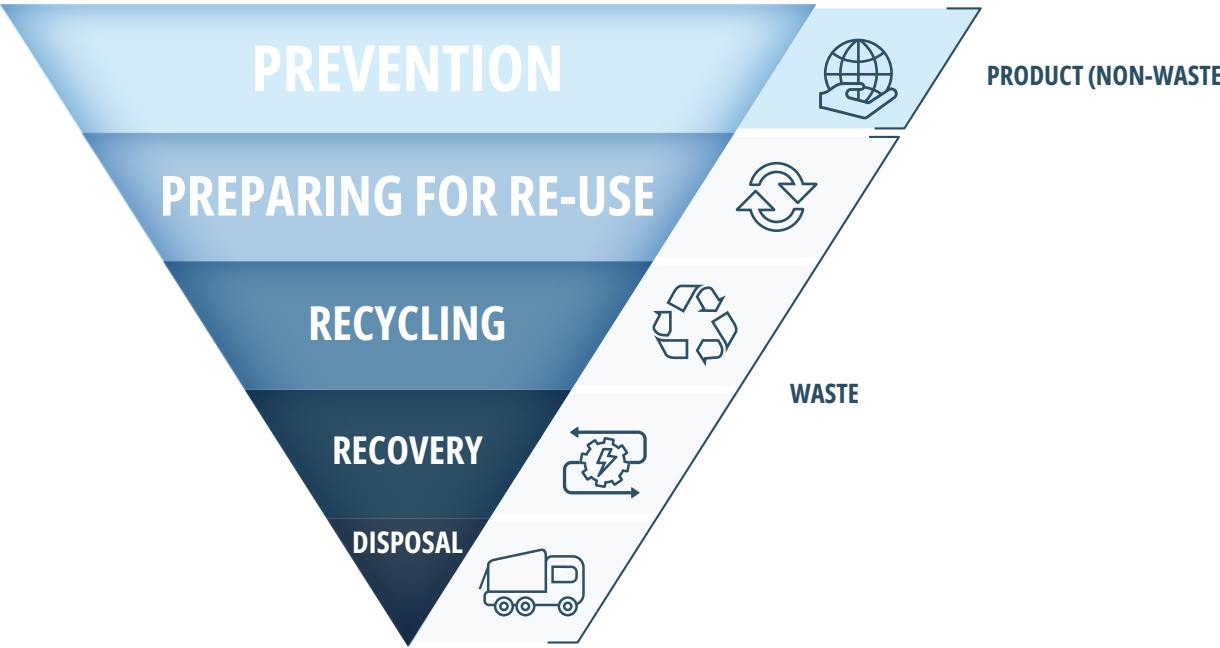
Many of our manufacturing sites operate process steps that use only collected rainwater rather than municipally supplied water. This approach decreases the site's demand on the local water network and reduces the volume of abstracted potable water required for day-to-day operations. It also supports local water resilience by lowering stress on regional infrastructure during high-demand periods and by limiting withdrawals from treated water systems.

The use of collected rainwater is currently implemented at site level based on local conditions, operational fea-

sibility and the availability of on-site collection capacity. These practices are not guided by a Group-wide policy, standard or directive, and there is no centralised methodology for measuring, verifying or reporting the quantity of rainwater used. As a result, a Group overview of the total volumes, performance variance between sites and long-term trend data remains limited.

SUBSTITUTING VIRGIN MATERIALS WITH RECYCLED ALUMINIUM

In Sweden, Feralco Nordic is looking to increase the use of aluminium-based sludges as a secondary input. This can reduce the consumption of primary raw materials, while keeping valuable material in use and reducing the carbon footprint. Recycled aluminium has been used for a long time and is sourced both from external filter residues, primarily from the aluminium extrusion and profile production business, and from internal filter residues. These secondary raw materials partly substitute the primary aluminium needed in production. This allows recovered components to be reintegrated into production rather than treated as waste. To ensure the material is fit for use, it follows a defined specification, including limits for metal impurities, supported by daily controls and ongoing communication with suppliers. In Vetlanda, this approach contributes to measurable substitution, saving around 950 tonnes of ATH per year, while quantification of further substitutions is in progress. Alongside this, many other Feralco sites run circularity projects focused on secondary raw materials, end-of-waste opportunities, waste reduction, closing loops and material efficiency, with project details managed locally. This approach strengthens circular resource use and supports the broader environmental purpose of water treatment, which can contribute to improved conditions in aquatic ecosystems.



SOCIAL INFORMATION

OUR APPROACH TO SOCIAL SUSTAINABILITY TOPICS

This section explains how The Feralco Group manages social impacts, risks and opportunities across its own workforce, workers in the value chain, and affected communities. The Feralco Group aims to provide a safe and engaging workplace, fair development opportunities, and responsible relationships with suppliers and communities. Health and safety have long been a core part of the business and an important foundation for its success.

As we prepare for CSRD reporting, additional social data is being introduced alongside existing health, safety and environment reporting, helping us become more transparent about our social impacts and risks and use stakeholder dialogue to improve over time.



**HEALTH AND SAFETY
HAVE LONG BEEN
A CORE PART
OF THE BUSINESS**

SOCIAL HIGHLIGHTS

S1 OWN WORKFORCE

- **Implementation of employee engagement and wellbeing surveys:** During 2025, The Feralco Group introduced a group-wide employee engagement and wellbeing survey to establish a baseline and support continuous follow-up, delivered by Eletive. The first survey reached an 82% response rate, followed by shorter quarterly surveys to track developments over time.
- **Engagement signal:** The 2025 employee engagement survey recorded an average engagement score of 3.9 out of 5, in line with industry benchmarks, while the Group's eNPS was 27 on a -100 to 100 scale, well above the benchmark of 5.
- **Safety framework:** The Feralco Group's occupational safety and health approach is based on systematic risk assessments, regular training, clear safety procedures, and structured incident and near-miss reporting with defined follow-up actions shared across locations. In 2025, this approach was further strengthened through the establishment of a Group-wide "Zero Harm" ambition and the rollout of a unified safety policy, reinforcing a consistent and preventive safety culture across all entities.
- **Group safety metrics:** 0 fatalities and 9 recordable work-related accidents reported, with 10 days lost.

MAKING CLEAN WATER POSSIBLE THROUGH SAFE AND EFFICIENT CHEMICALS IS AT THE CORE OF THE FERALCO GROUP'S BUSINESS. BY SUPPORTING DRINKING WATER AND WASTEWATER TREATMENT, OUR PRODUCTS CONTRIBUTE TO SERVICES THAT ARE IMPORTANT FOR PEOPLE AND COMMUNITIES. AT THE SAME TIME, THE FERALCO GROUP SEEKS TO ACT RESPONSIBLY IN THE LOCAL COMMUNITIES WHERE WE OPERATE AND TO MAINTAIN DIRECT, CONSTRUCTIVE DIALOGUE WITH PEOPLE AND STAKEHOLDERS.

S2 WORKERS IN THE VALUE CHAIN

- **Responsible expectations:** By working closely with business partners and reviewing how they manage social matters, The Feralco Group aims to support fair treatment, adequate pay and safe workplaces for workers in the value chain. These expectations are reflected in the Business Code of Conduct, and the approach is being further systematised.
- **Supplier dialogue:** Special emphasis is placed on raw material and transport suppliers, which represent a major share of spend and carbon footprint. Structured dialogue helps address safety and long-term cooperation, which is also important for workers in the value chain.
- **Routine development:** Group-wide supplier routines are being increasingly formalised, which also supports our knowledge about workers in our value chain.

S3 AFFECTED COMMUNITIES

- **Community projects:** In 2025, we carried out at least 10 initiatives for local communities, responding to needs such as education, inclusion, community support, and cultural and sports activities.
- **Open engagement:** "Neighbour Open House" in Sweden and "Open Gates" in Germany support two-way dialogue with neighbours, authorities and local stakeholders.

OWN WORKFORCE

GOALS	MEASURES
Zero workplace incidents.	► To achieve zero workplace incidents, The Feralco Group applies a consistent occupational safety and health approach across all its entities. This includes systematic risk assessments, regular health and safety training, and the provision of safe, suitable equipment for daily tasks. Clear communication, hands-on instruction, and defined safe working routines ensure that employees understand risks early and apply preventive measures consistently. These principles are embedded in everyday operations and form a core part of The Feralco Group's occupational safety and health policy.
All employees trained annually on ESG topics.	► To deliver ESG training to all of its employees annually, The Feralco Group strengthens learning and development so that people build practical ESG know-how alongside the skills they need in their daily roles. At Feralco in France, this includes programmes to develop skills and employability over time. In Germany, this includes regular employee training that helps teams understand expectations and apply them in everyday work. In the UK and in Spain, trainings were held on sustainability and ESG reporting by the Group's sustainability controller. Together, these measures support consistent knowledge across the Group and help employees stay confident and capable as requirements evolve.
Non-discriminatory development possibilities. At least 30% women in leadership positions by 2035, progressing towards a balanced 50/50 gender representation over time.	► To support non-discriminatory development opportunities and achieve at least 30% women in leadership roles by 2035, with a longer-term ambition of gender balance, The Feralco Group aims to ensure that opportunities are fair and based on skills and performance. This includes assessing equal pay and gender balance in remuneration structures, as well as implementing measures that support a diverse workforce across recruitment, development and leadership practices.

The Feralco Group's approach to its own workforce topics is centred on being an attractive employer in a safety-critical industry while building trust through clear guidelines and everyday practices. The Group's actions ensure safe and healthy working conditions and promote wellbeing and quality of life at work. The Group aims to go beyond minimum requirements by fostering a safe workplace through information, regular training and consistently safe working conditions, helping people understand risks early and follow routines with confidence.

SUPPORTING WORK-LIFE BALANCE AND PREVENTING STRESS

The Feralco Group monitors indicators related to health, stress and work-life balance through regular employee engagement and wellbeing surveys conducted across the Group. Based on survey outcomes, the different Feralco units adopt measures that are considered appropriate to their local context, challenges, culture and workforce composition. Feralco in France works to strengthen quality of life at work by combining work-life balance measures with structured prevention of stress and psychosocial risks, supported by wellness workshops and awareness activities anchored in its Occupational Health and Safety policy. These workshops run annually and cover practical topics such as sleep, nutrition, stress and emotion management, digital detox, and posture and prevention related to musculoskeletal disorders. Participation in the wellness offer has increased. Over the same period, absenteeism fell from 2.89% in 2024 to 1.84% in 2025. Feedback from the annual wellbeing and engagement survey is used to shape next steps, and as manager feedback was identified as the main improvement area, training on this topic will be implemented for all managers in France.



STRENGTHENING DEVELOPMENT AND FEEDBACK

The Feralco Group sees employee development as essential to long-term performance and engagement and works to create an environment where people can strengthen their skills and grow into new roles. At Group level, this is supported by quarterly employee engagement surveys, where employees can share how they experience the feedback culture and their own development opportunities, as well as provide specific comments. In France, this is further supported through regular training, career development plans and internal mobility, with training covering topics from work organisation and time management to IT, logistics, languages, marketing and sales, as well as safety. Career development plans are built from annual and professional interviews and an annual needs assessment, then updated over time to reflect employee aspirations and internal opportunities. As a result, training hours per employee have increased, reflecting a stronger focus on skills development and additional health, safety and quality of life training linked to needs identified in HR discussions and annual reviews. To reinforce appreciation and clarity at Feralco Nordic, for example, an annual performance and development review is conducted for all employees consistently across functions, levels and locations, covering performance, work situation, relations, goals and feedback.

STRENGTHENING WORKPLACE SAFETY AND REDUCING RISKS

Workplace safety is a core priority for The Feralco Group. At Group level, it is guided by the target of zero workplace incidents and reinforced through a safety management system. This includes: Risk assessments, mandatory trainings in all entities, as well as regular safety briefings held throughout the year based on workplace-specific risk assessments, supported by external specialists. These measures aim to prevent “operational blindness”, and near misses are recorded so that measures can be derived locally and then shared with other locations.

Safety is reinforced through job-specific training and workshops, documented risk assessments, practical improvements such as ergonomic equipment upgrades and equipment designed to reduce manual effort and physical strain. The use of protective equipment is supervised by team managers, and training is documented through individual certificates.

At Group level, incident, accident and near miss reporting is anchored in local HSE procedures that cover employees and contractors. In 2025 the Group had a Lost Time Injuries Rate, LTIR of 3.9 LTIR per million hours worked.



WORKERS IN THE VALUE CHAIN

GOALS	MEASURES
Implement routines throughout all businesses for their supplier management.	To implement thorough supplier management, The Feralco Group embeds consistent routines that help identify and address human rights risks in the value chain, including the risk of child labour in sourcing contexts such as Africa, China and the UK, and in aluminium-related value chain services. These routines are supported by a Group-wide Human Rights Code of Conduct that sets expectations for customers and suppliers and applies to everyone impacted by The Feralco Group's business relationships. The target is to have these supplier assessment routines implemented across all businesses by the end of 2026, creating a common minimum standard for supplier management throughout the Group.
Assess suppliers for working-conditions, safety, quality and environmental risks.	During 2026, develop and implement a supplier assessment process for at-risk raw material suppliers, using a structured tool to screen for working conditions, health and safety, human rights, business conduct and environmental risks. The results will be used to prioritise supplier dialogue, follow-up actions and, where needed, corrective measures.

The Feralco Group's approach to workers in its value chain starts from the view that supplier relationships are vital, not only to deliver environmental reduction targets but also to create positive social impacts beyond The Feralco Group's own operations. The Group therefore focuses on building long-term collaboration and asks suppliers and logistics partners to join this journey by aligning with shared expectations on responsible working conditions. This is supported by keeping up regular relationships with both suppliers and transportation partners, so expectations and issues can be addressed early and consistently. Where serious concerns arise, The Feralco Group recognises that responsible supplier management may also mean changing or potentially ending business with suppliers that do not meet basic ethical standards for working conditions. This approach links partnership with accountability and aims to strengthen trust, resilience and responsible practices throughout the value chain.



BUILDING SUPPLIER DIALOGUE ON LONG-TERM PARTNERSHIPS

The Feralco Group places strong emphasis on close dialogue with key partners, focusing on raw material suppliers and transportation suppliers. A “good relationship” is defined in practical terms, including on-time delivery, meeting demand and specifications, cooperation and flexibility, and sustainability efforts. Dialogues are held at different frequencies depending on the material or service, ranging from daily and weekly touchpoints to monthly exchanges. Typical topics include capacity and costs, safety, development, and long-term cooperation, helping both sides plan ahead and resolve issues early. Insights from these discussions are used to improve day-to-day coordination and strengthen collaboration over time. This stable and long-term collaboration helps provide reliable job security for workers in our value chain.

RAISING HEALTH AND SAFETY EXPECTATIONS IN THE SUPPLY CHAIN

The Feralco Group integrates supplier health and safety into its ongoing supplier management and surveys, aiming to ensure that basic safety practices are understood and followed beyond its own sites. Internal safety assessments are supported by external occupational safety specialists, and, depending on the topic, additional experts are involved for site inspections, in some cases going beyond legal requirements. Supplier site safety walkarounds are planned but are currently carried out sporadically rather than systematically, and when they take place, they are led by the purchasing function.

AFFECTED COMMUNITIES

GOALS

Conduct 10 community projects annually.

MEASURES

To give back to the community, The Feralco Group aims to act as a responsible local partner in the communities where it operates by supporting social projects that respond to local needs. This includes taking an open approach to dialogue and selecting initiatives that reflect ESG aspects in a practical way, such as education, community support, or local partnerships. By running these projects regularly, the Group strengthens trust locally and keeps community engagement visible and consistent.

Although Feralco does not directly provide drinking water or wastewater services, its products support treatment systems that are important for communities, public health and the protection of receiving waters. Affected communities are considered as stakeholders where Feralco's operations, products or value chain may influence local environmental conditions, water quality, wastewater treatment outcomes or the reliability of essential water-treatment systems.

To strengthen its positive contribution to affected communities, the Feralco Group focuses on proactive communication and good neighbour relationships, aiming to build trust through openness and respectful day-to-day interaction in the places where it operates. In the Netherlands, this includes maintaining clear communication channels and taking a neighbourly approach to address questions early and avoid misunderstandings. In parallel, in Sweden, Feralco Nordic's ongoing dialogue with local authorities is used to align on local expectations, discuss site-related topics and ensure a consistent relationship over time. Building on these foundations, The Feralco Group also plans to increase the number of social projects to deepen community engagement in a practical and locally relevant way.

OPENING DOORS TO LOCAL COMMUNITIES

By inviting locals, schools, authorities and other stakeholders to visit our facilities we offer an opportunity to learn about our operations as well as to share their input. This brings us closer to the external communities. Through "Neighbour Open House" events, Feralco Nordic explains what happens at production sites and why the business matters, sharing information on operations, environmental impacts and safety measures, and inviting neighbours and local stakeholders to ask questions. In Germany, "Open Gates" style events provide factory tours and insights into production and technology, alongside information on training and career opportunities and on safety and environmental protection, framed as responsible neighbourliness. These are examples of events designed as two-way conversations, with visitors encouraged to raise questions during tours and discussions, helping The Feralco Group strengthen relationships with local authorities, nearby residents and industrial neighbours.

LOCAL PARTNERSHIPS THAT MAKE A DIFFERENCE

Social projects are delivered locally, reflecting community needs and priorities in each country. Several initiatives focus on education and youth engagement, including Feralco Nordic's support for the Natur & Miljöboken initiative in Sölvesborg, which encourages families to discuss climate and sustainability, as well as Future Day in Nienburg, the annual Feralco Water Award and local school support in Germany. Other projects strengthen inclusion and wellbeing, such as Feralco Italia and ECO 92's support for Lega del Filo d'Oro, the Vidas campaign and the Francesca Rava Foundation, and Feralco in France's collaboration with an organisation employing people with disabilities on a site beautification project. Community sport is also supported through youth football kits in the UK and Gesitma's sponsorship of the DUX La Rioja women's football team in Spain.



Photo: Miguel Peché, La Rioja

GOVERNANCE INFORMATION

OUR GOVERNANCE APPROACH



This section explains how The Feralco Group works to ensure responsible and transparent business conduct through compliance, ethics, reporting and risk management. Sustainability reporting is increasingly integrated into management processes, supported by a central reporting system that enables structured data collection and prepares the Group for full CSRD-compliant reporting through Mellby Gård from 2027. Accountability is demonstrated through recognised external assessments and certifications, including the Group's EcoVadis rating and ISO-based management systems where applicable. Risk is reduced through clear expectations set out in Codes of Conduct, a secure whistleblowing channel and procurement strategies designed to strengthen continuity of supply. A risk-based approach to information security helps protect information, personal data and critical business systems, supporting business continuity and reducing operational risk. The Group also contributes to responsible industry development through active participation in industry collaborations, including INCOPA, which support regulatory awareness, technical knowledge-sharing and the long-term development of the sector.

GOVERNANCE HIGHLIGHTS

G1 - BUSINESS CONDUCT, REPORTING, COMPLIANCE AND ASSURANCE

- **CSRD reporting:** This 2025 report covers Feralco at Group level and is inspired by ESRS, but it does not claim full CSRD compliance. From 2027, formal CSRD reporting will be provided through Feralco's parent company, Mellby Gård.
- **External assessment:** EcoVadis is used as an external sustainability assessment at country and Group level, supported by evidence and documentation from the reporting system.

ETHICS, TRAINING AND SPEAK UP

- **Code of Conduct training:** Annual training is aimed to be delivered to all employees, with confirmation of acceptance and monitoring of completion, renewed yearly and translated into local languages.
- **Ethics and integrity:** In 2025, no breaches of the Code of Conduct, corruption or bribery, and no whistleblowing cases were reported through the Group's available reporting channels, including the independent whistleblowing portal.
- **Transparency on maturity:** Group-level data on corruption and bribery has not previously been collected on a consolidated basis, but as part of the development of this report, the related reporting process has started to be formalised. For 2025, management has reported zero incidents of corruption or bribery.

PROCUREMENT AND SUPPLIER-RELATED RISK REDUCTION

- **Procurement strategies:** Central procurement is made for strategic raw materials, while most other procurement is made locally. In Germany, e.g., a dual supplier strategy is in place to reduce dependency and strengthen flexibility and continuity for strategic suppliers.
- **Ethics and speaking up:** Zero breaches of the Code of Conduct and zero whistleblowing cases were reported in 2025, supported by the independent channel and clear policy expectations



BUSINESS CONDUCT

GOALS	MEASURES
Full compliance with CSRD requirements – reporting through Mellby Gård from 2027. Sustainability certifications (ISO 14001) and third-party assessment by EcoVadis.	To meet CSRD requirements, The Feralco Group's formal sustainability reporting will be included in Mellby Gård's consolidated reporting from the 2027 reporting year, in line with how Feralco's financial data is already reported at parent company level. To support this, The Feralco Group is embedding sustainability reporting into regular management processes and building a consistent Group-wide reporting structure. Legal compliance remains the baseline, while the reporting process is designed to meet growing stakeholder expectations and prepare for reporting through Mellby Gård. A central reporting system is used to collect and structure sustainability data, helping to create a reliable and comparable dataset across the Group. To achieve third-party verification and assurance of sustainability efforts, The Feralco Group uses recognised certifications and assessments to provide external confirmation that its environmental management and sustainability practices are being implemented in a structured way. Most entities of the Group maintain an ISO 14001 and 9001 and other relevant ISO certifications at site level where applicable. The use of EcoVadis at Group level as well as at site level as an external sustainability assessment demonstrates progress and identifies improvement areas. The sustainability data collected through the Group's central reporting system supports these certifications by providing consistent evidence and documentation across businesses.

THE FERALCO GROUP'S APPROACH to governance focuses on two priorities that work together to reduce risk and protect long-term business continuity. First, legal compliance is treated as the baseline and is strengthened through the Code of Conduct and upcoming CSRD reporting, including a central reporting function that also supports whistleblower reporting, so concerns can be raised and handled in a controlled way. Second, the Group

recognises that supplier relationships are a major governance lever and links this closely to the topic of workers in the value chain (S2), with the aim of becoming more aligned across the Group to reduce supply chain risks and secure business.

Where gaps in group-wide structure still exist, the local entities address this through building clearer routines and shared processes, so expectations and responsibilities are consistent

within each local entity. At the same time, the Board of Directors provides oversight of sustainability strategy, risks, and performance, reinforcing its importance at group level. Overall, this governance setup is intended to secure business and increase resilience, supporting reliable delivery in a business that contributes to essential drinking water production.

CENTRAL PROCUREMENT STRATEGIES STRENGTHEN RESILIENCE

The Feralco Group uses a set of complementary procurement strategies to secure supply, reduce risks and apply consistent standards across the Group. Central procurement is used for strategic raw materials to leverage buying power, ensure security of supply and apply consistent requirements. In addition to the contractual details, we expect our suppliers to adhere to our Business Partners Code of Conduct which also includes expectations on ESG (such as anti-corruption and labour standards).

For the Feralco entities, the central procurement supports cost efficiency, supply chain resilience and sustainability goals, for example for aluminium trihydrate, magnetite, zeolite and magnesium hydroxide, strengthened by long-term supplier relationships and regular coordination in global and European meetings. In Germany, a dual supplier strategy reduces dependency on single sources and increases flexibility on quality, delivery capability, price and availability, with the second supplier serving as a built-in contingency option. Together, these approaches help reduce disruption risks and support reliable delivery in a business that depends on stable raw material supply.

PARTICIPATING IN INDUSTRY ASSOCIATIONS

The group participates in several industry associations, most actively in the Inorganic Coagulants Producers Association, INCOPA and the European Sulphuric Acid Association, ESA, both are sectors under the European Chemical Industry Council, CEFIC. INCOPA and ESA support their members by providing a platform for collaboration on regulatory, health, safety and environmental matters, facilitating the exchange of knowledge and best practices, monitoring industry developments and market trends, engaging with authorities and stakeholders, and promoting the responsible and sustainable use of their respective products and technologies, including the development of relevant standards, methodologies and industry guidance.

In addition, the different legal entities within The Feralco Group contribute to various organisations at national level.

INFORMATION SECURITY AND DATA PROTECTION

The Feralco Group applies a risk-based approach to information security and data protection to support the protection of information assets, personal data and critical business systems. The approach combines governance structures, policies and standards, technical and organisational controls, incident management processes, employee awareness activities and business continuity measures.

Information security and data protection risks are assessed and managed through activities including risk assessments, access control reviews, asset and system mapping, incident management procedures and supplier-related security reviews. Relevant security and data protection requirements are integrated into operational processes to support compliance with applicable legal, regulatory and contractual obligations.

During 2025, The Feralco Group further strengthened its information security governance through a dedicated programme to improve preparedness for the Network and Information Security Directive (NIS2). Activities included security maturity and gap assessments,

mapping of information assets and critical systems, supplier security reviews, and the continued development of policies, standards and governance processes. These activities support a more structured approach to cyber resilience and regulatory compliance.

Employee awareness remained an important element of the Group's approach during 2025. Through a Group-wide awareness programme, employees participated in cybersecurity training and phishing simulations designed to strengthen understanding of cyber-related risks, support responsible handling of information and contribute to the continued development of a security-conscious culture across the Group.

ETHICS AND SPEAK UP, WITH ZERO CASES REPORTED

Feralco reinforces a culture of integrity through mandatory Code of Conduct training for all employees of the Group, completed during onboarding. Compliance is monitored through managerial responsibility, and the Code of Conduct and related policies are updated when needed, supported by internal training to keep expectations clear and current. In 2025, zero breaches of the Code of Conduct were reported.

INDEPENDENT WHISTLE- BLOWING PORTAL

The Feralco Group provides an independent whistleblowing channel so employees and external stakeholders can report serious irregularities safely and confidentially. The portal ensures reports are handled independently and documented securely in line with the Whistleblower Policy. The policy explicitly protects whistleblowers and relevant parties from retaliation and sets out how cases are assessed, investigated and addressed. The portal link is made available through internal policy communication and publication of the Whistleblower Policy across Group platforms.

Link: [HTTPS://WWW.FERALCO.COM/WHISTLEBLOWER/](https://www.feralco.com/whistleblower/)

THIRD-PARTY ASSURANCE THROUGH CERTIFICATIONS AND RATINGS

The Feralco Group uses third-party tools to increase transparency and demonstrate that key management systems are working in practice. At Group and entity levels, this currently includes an EcoVadis assessment, which is used to evidence compliance expectations and continuous improvement. Certifications and ratings are maintained through recurring cycles that combine internal audits with external assessments, helping ensure readiness and consistency over time. This includes ISO certifications, where most of the Feralco Group sites maintain ISO 9001 and ISO 14001 certification. The results support sustainability disclosures by providing externally grounded signals on performance and governance practices.

THE END PART I

THIS FIRST PART OF THE PUBLICATION HAS SO FAR DESCRIBED

how sustainability is taking shape across The Feralco Group through strategy, governance and practical examples from different parts of the business. The following Sustainability Statement brings this work together in a more formal and structured way, following the logic of the European Sustainability Reporting Standards (ESRS) and presenting the policies, actions, metrics and targets that underpin our current reporting.

PART II ►

FERALCO GROUP'S 2025 VOLUNTARY SUSTAINABILITY STATEMENT

INSPIRED BY ESRS



**WE AIM TO BE EUROPE'S
FOREMOST PROVIDER
OF SUSTAINABLE WATER
TREATMENT CHEMICALS,
DELIVERING INNOVATIVE
AND SAFE SOLUTIONS
THAT DRIVE GROWTH,
MINIMIZE ECOLOGICAL
IMPACT, AND UPHOLD
SOCIAL RESPONSIBILITY.**

FERALCO GROUP

SUSTAINABILITY STATEMENT 2025

This sustainability statement is prepared on a consolidated basis for The Feralco Group. The scope of consolidation differs from the financial statements, as The Feralco Group does not prepare consolidated financial statements. Financial reporting is consolidated at parent company level by Mellby Gård AB, and The Feralco Group therefore has no formal legal obligation to prepare either financial or sustainability statements. Instead, the sustainability statement is prepared on a voluntary basis and follows the general structure and themes of the ESRS to support transparency and build internal readiness. It does not claim full ESRS compliance. While external assurance is not required, the company has implemented internal review and validation processes to ensure the accuracy and reliability of the reported information.

The Feralco Group is a European supplier of high-performance water treatment and process chemicals, headquartered in Helsingborg, Sweden. The Group supplies municipal and industrial operators across Europe with coagulants, flocculants and process reagents for drinking water, process water, sewage and industrial effluents, as well as applications such as papermaking. Feralco operates across Europe, with 21 industrial sites in Sweden, the Netherlands, Germany, the UK, France, Italy and Spain, and a distribution site in Switzerland, combining local presence with reliable supply and technical support such as jar testing, on-site trials and performance monitoring. Based on group reporting, Feralco's products support water services reaching more than 150 million people in Europe.

During the reporting period, The Feralco Group generated total revenues of 2 532 MSEK (228.74 MEUR).

The Feralco Group has a strong commitment to sustainability and HSE. **Read more at www.feralco.com.**

Before presenting the detailed disclosures, the following highlights provide context for the sustainability statement:

- ▶ This is the first year in which The Feralco Group publishes a consolidated sustainability statement. As reporting processes and data availability continue to mature, further improvements in future reporting cycles are expected.
- ▶ The Group's total greenhouse gas emissions for 2025 are estimated at approximately 175–185 ktonnes of CO₂e. The Group has set an ambition to reduce CO₂e emissions with a 2035 reduction pathway currently indicated at 20–40% from a 2025 base year. The most significant share of emissions arises from upstream raw materials.
- ▶ Increased use of circular economy principles, including the expanded use of secondary raw materials, is identified as a key lever to reduce emissions, preserve virgin resources and strengthen supply resilience. The overall impact on total emissions depends on supplier practices and value chain dynamics.
- ▶ As a company operating in the chemical industry, the protection of workers and the environment is a core consideration and is embedded in the Group's operational practices.
- ▶ The Group aims to act responsibly and transparently. No known violations of business conduct requirements were identified during the reporting period.

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THE SUSTAINABILITY
STATEMENT IS PREPARED
ON A VOLUNTARY BASIS
AND FOLLOWS THE GENERAL
STRUCTURE AND THEMES
OF THE ESRS TO SUPPORT
TRANSPARENCY AND BUILD
INTERNAL READINESS

ESRS 2 GENERAL INFORMATION

ABOUT THE SUSTAINABILITY STATEMENT BP-1

This sustainability statement covers the Group's own operations and, to a limited extent, its upstream and downstream value chain. Upstream information is based on long-term supplier relationships, assessments and supplier engagement. Downstream transparency is limited due to the Group's large and diverse customer base.

No subsidiaries in The Feralco Group are exempted from sustainability reporting. Certain disclosure requirements may have been omitted as they were assessed as not applicable or material to the undertaking. No omissions have been applied on the basis of intellectual property, know-how, innovation, or ongoing negotiation.

STRATEGY, BUSINESS MODEL AND VALUE CHAIN SBM-1

The Feralco Group operates in western Europe as a manufacturer and supplier of water treatment chemicals, with a product portfolio spanning the production of coagulants and other chemical solutions used primarily in municipal and industrial water treatment processes. The Group's business is centred on the transformation of raw materials into specialised products that support safe and efficient water purification. The customers are mostly found across the regions in which Feralco operates. Its operations include 18 production sites, complemented by logistics, technical support and administrative functions.

The Group's revenues are generated through the sale of chemicals used in drinking water production, wastewater treatment, industrial process water applications and related environmental services. A significant share of these sales is conducted through public procurement processes in

Western Europe, reflecting the essential nature of the Group's products. The customer base consists of municipalities, utility providers, and industrial clients, together representing a diverse market.

The business model is supported by long-term supplier relationships that ensure access to key raw materials such as aluminium- and iron-based compounds, hydrochloric acid, sulphuric acid and other chemical inputs. These materials form the foundation of the Group's production processes. Additional resources required for operations include energy, water and specialised equipment. The Group's manufacturing processes convert these inputs into value-adding performance products that help to secure reliable water treatment with proven chemistry, backed by transparent sustainability data, and robust logistics systems that support both compliance today and resilience for tomorrow.

Across the upstream value chain, environmental and social information is obtained through supplier engagement, assessments and site visits. These activities support the Group's understanding of raw material dependencies and supply chain risks. Full transparency across all upstream actors is not yet available or possible, but long-standing supplier relationships provide a degree of insight into sourcing practices and material impacts.

Downstream, the Group's products are distributed to a wide range of customers across Europe. Although sales are concentrated in public procurement channels, full visibility of the downstream value chain is limited due to the large and diverse customer base, which includes more than 3 000 active customers in 2025. The majority of these customers use The Feralco Group's products directly in water treatment applications, where the chemicals undergo immediate transformation and do not remain as standalone products. The Feralco Group's value chain is characterised by a flow from raw material sourcing to manufacturing, distribution and end-use in water treatment and other processes. Products typically do not contribute significantly to end-of-life waste, as they are consumed within chemical reactions during water treatment. However, value-chain dependencies in-

clude energy markets, raw material markets and transportation networks, which influence operational continuity and cost efficiency.

While The Feralco Group's sustainability focus primarily covers the segment of the value chain from direct suppliers to customers, this does not imply that activities further upstream (such as suppliers' suppliers, virgin excavation or recovered materials) or further downstream (such as customers' customers, by-products or end-of-waste outcomes) are considered unimportant or of lower concern. Rather, these stages fall primarily under the responsibility of the respective suppliers and customers with whom Feralco interacts and are therefore outside The Feralco Group's direct operational control.

Notwithstanding these limitations, The Feralco Group recognises that sustainability impacts may arise across the entire cradle-to-grave value chain. The defined focus reflects a deliberate prioritisation of areas where Feralco has the greatest ability to influence outcomes and where meaningful impacts can be achieved, while acknowledging that full value chain transparency is an area of ongoing development.

Overall, the business model reflects The Feralco Group's role as a provider of essential water treatment solutions, supported by established production capabilities and supplier relationships, and operating within a value chain where transparency varies between upstream and downstream activities.

Product Use

The Feralco Group supplies its products exclusively to professional and industrial customers and is committed to ensuring that customers receive clear and accurate information on safe handling and use. All products are labelled and documented in accordance with applicable legal and regulatory requirements, including information on hazardous properties where relevant. Product information is provided in the official languages of the countries where products are manufactured, stored or marketed. Safety Data Sheets (SDS) are available for all relevant Feralco products and are regularly maintained to support safe handling throughout the value chain. In addition, Feralco provides technical support and product-related guidance where required to help customers apply products safely and effectively.

The Feralco Group considers environmental impacts arising during the use phase of its products and seeks to support positive environmental outcomes through product stewardship, customer collaboration and continuous improvement of treatment efficiency.

Products are selected to meet individual customer requirements and are supported by technical expertise delivered in collaboration with customers, who retain ultimate responsibility for product use. This includes product selection, dosage optimisation and process support aimed at maintaining efficient and stable treatment operations.

Through careful product selection, customers can improve treatment efficiency, reduce treatment disruptions, improve resource utilisation and meet compliance requirements more efficiently. In this way, The Feralco Group helps optimise treatment performance and reduce the amount of impurities remaining in treated water.

By enabling effective treatment of drinking water and wastewater, the Group's products contribute to the removal of suspended solids, phosphorus and other contaminants that could otherwise be discharged into the environment. As a result, the use of The Feralco Group's products supports the supply of high-quality drinking water, efficient nutrient recovery from wastewater, the protection of aquatic ecosystems and compliance with legislative and environmental requirements.

The Group recognises that sustainability impacts may arise throughout the product life cycle and therefore considers downstream use-phase impacts as part of its sustainability approach. Particular focus is placed on understanding the positive environmental outcomes enabled through product applications, including secured water quality, nutrient recovery, protection of receiving waters and improved water management.

impacts, strengthening social responsibility and ensuring robust governance across the organisation.

The Group's sustainability-related goals span its significant product groups, customer categories and primary geographies in Europe. Feralco aims to deliver effective water treatment chemicals with an emphasis on water stewardship, efficient resource use and reduced environmental footprint. Circular economy principles guide the optimisation of raw material use, with increasing attention to reuse, recycling and the integration of secondary materials. Sustainability considerations are incorporated into supplier evaluation and selection, with a focus on compliance, continuous improvement and strengthened regional supply-chain resilience.

The company's strategic direction is also shaped by transparent and regular engagement with employees, communities, customers, suppliers, regulators and owners. These interactions inform ongoing improvements in environmental and social performance, including monitoring of energy use, emissions, pollution, water consumption, biodiversity and material efficiency. Mechanisms are being developed to better understand and address social impacts, with the focus being on understanding impacts on the own workforce, and on understanding the impact on the workers in the value chain.

The environmental aspects include monitoring of energy use, emissions, pollution, water consumption, biodiversity and material efficiency. The current focus is to establish solid carbon accounting mechanisms and to start deducing the climate impact.

For social aspects mechanisms are being developed to better understand and address social impacts. The current focus is to understand the impact on the own workforce, and on understanding the impact on the workers in the value chain.

Supplier relationships are governed by due diligence, transparency and the Business Code of Conduct; compliance monitoring through assessments, audits and site visits is progressing. Water stewardship remains a central environmental pillar, supported by efforts to prevent contamination and promote sustainable water management. Resource efficiency, circular-material use and waste minimisation continue to guide operational decision-making across the Group. Customer and vendor feedback forms part of continuous improvement, and operations are compliant to all legal requirements and further aligned with standards such as ISO 14001 and IPPC where applicable.

The Feralco Group's sustainability strategy focuses on minimising its carbon footprint and increasing resource efficiency, including more circular flows of materials. Governance responsibilities for environmental and social matters are distributed across departments and supported by a zero-tolerance approach to corruption and bribery, as well as adherence to due-diligence requirements. Stakeholder engagement, responsible interaction with public-policy processes and future full compliance with ESRS and CSRD reporting are also included within the Group's strategic commitments.

Overall, the Group's strategic trajectory reflects a structured, long-term approach to environmental stewardship, responsible value-chain practices and strengthened governance, while continuing to support customers in public and industrial water treatment across Europe.

The Feralco Group's value chain

Feralco produces and delivers aluminium- and iron-based coagulants for water treatment and industrial applications.

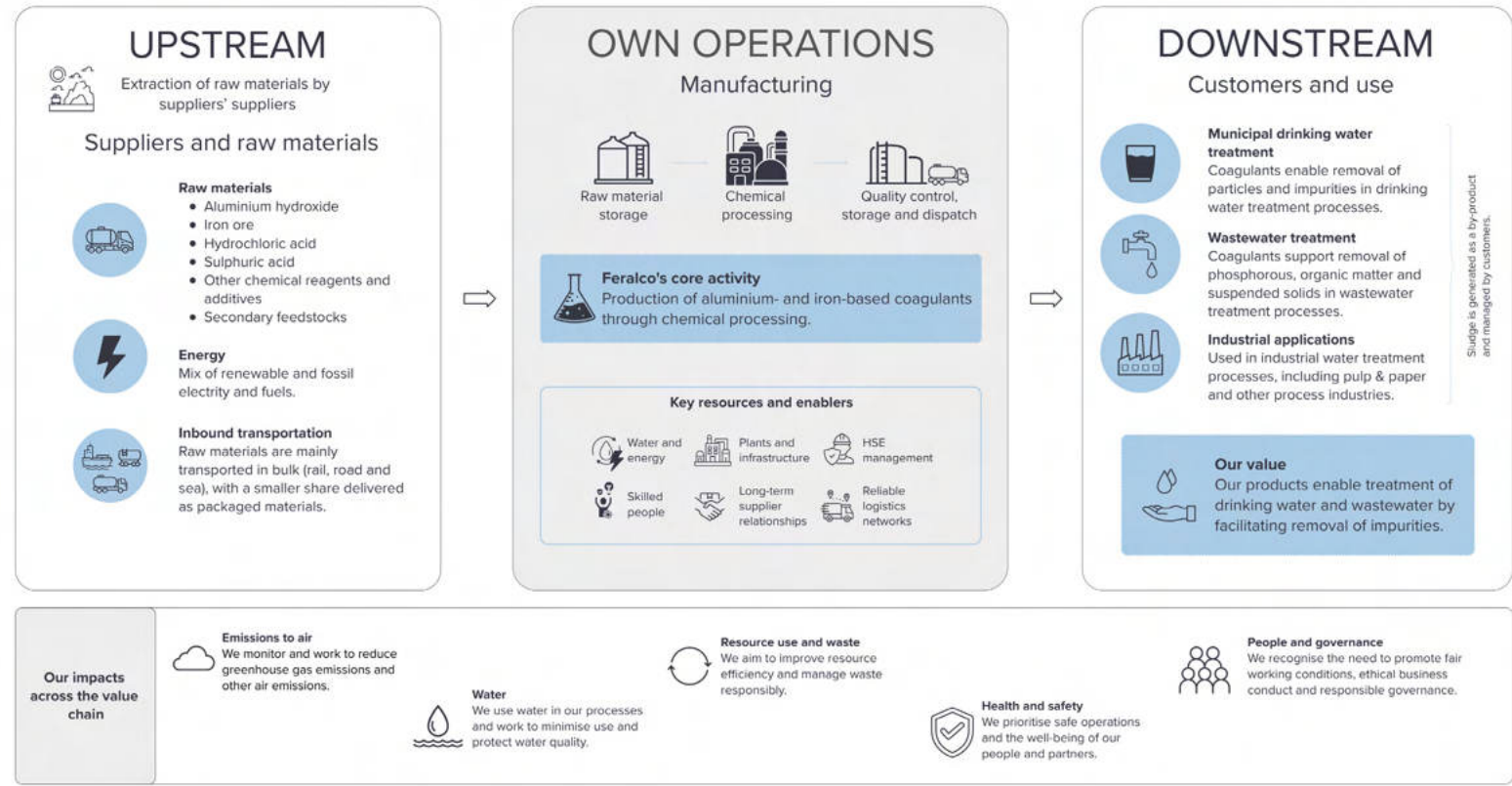


Figure 1. The Feralco Group's value chain

their respective areas, supported by the Circularity Manager, who provides technical expertise and coordination, and the Sustainability Controller, who oversees reporting, monitoring and follow-up.

Expectations for conduct and decision-making are defined through internal frameworks, including the Code of Conduct, the Code of Conduct for Business Partners, the Personnel Policy, the Whistleblower Policy, the Fraud Directive and the HSE framework. These frameworks guide behaviour, compliance and risk awareness across the organisation and support the integration of governance responsibilities into operational processes.

Decision-making and signatory authority follow established internal rules. The company is jointly represented by any two board members or a board deputy, by two authorised external signatories, or by one authorised external signatory together with a board member or deputy. The CEOs are authorised to represent the company in matters relating to the day-to-day management of its operations.

Targets related to material impacts, risks and opportunities are developed under the leadership of the CEOs and implemented through the line organisation. Monitoring of progress takes place through existing management processes, with matters referred to executive management or the Board when required. The Board of Directors sets the sustainability strategy and reviews progress against key targets on a regular basis. Ongoing monitoring is led primarily by the Circularity Manager and the Sustainability Controller, who together with local managers and sustainability reporters, collect data and ensure consistent reporting. The activities are under oversight from executive management.

Sustainability is incorporated into strategic and risk-related decision-making across the Group. Environmental and social indicators, including energy use, emissions, water consumption, biodiversity, occupational safety, diversity and responsible sourcing, are monitored and reviewed. Risk management processes are updated as needed to reflect regulatory developments and sustainability-related risks. Supplier relationships are managed through transparency requirements, together with occasional assessments and audits.

POLICIES TO GOVERN SUSTAINABILITY MDR-P

The Feralco Group is continuing to develop a more consolidated approach to sustainability governance. At present, sustainability-related matters are managed through existing local procedures, management systems and regulatory compliance requirements across the Group's legal entities. Group-wide policies covering environmental, social and governance matters are under development as part of the ongoing consolidation of the sustainability governance framework. This approach reflects the Group's organisational structure, where local entities retain operational responsibility while the Group continues to strengthen coordination and alignment over time.

Several internal documents currently provide guidance on sustainability-related matters across the Group. These include the Corporate Social Responsibility Policy, the Code of Conduct, the Code of Conduct for Business Partners, the Personnel Policy, the Whistleblower Policy, the Fraud Directive and the Health, Safety and Environment (HSE) framework. Together, these documents set expectations for ethical behaviour, workplace safety, human rights safeguards, non-discrimination and responsible business conduct. What implementation looks like in practice varies across the legal entities of The Feralco Group. As a minimum, all entities are required to comply with the Group policies while retaining the flexibility to adopt more advanced practices and align with local regulations where applicable. While these group policies do not yet form a consolidated sustainability policy framework, a Group Sustainability Strategy, described in a previous chapter, provides overall direction for sustainability efforts across The Feralco Group.

Environmental and social matters are primarily managed through compliance with local legislation, permitting requirements and operational management systems, including ISO 14001 certification in most entities. These systems guide the handling of environmental impacts, workplace health and safety, and other sustainability-related issues.

Entity-specific approaches and procedures are also applied where required by local legislation or where individual sites have sustainability ambitions that exceed Group-level expectations. These may include additional measures for pollution control, chemical handling, workplace safety, environmental monitoring and supplier engagement.

The Group operates across multiple regulatory frameworks, including the EU, Switzerland and the UK, which requires a degree of local adaptation in sustainability practices. As a result, approaches may vary between entities. Ongoing efforts are focused on clarifying responsibilities, further developing internal processes and enhancing coordination over time supported by improvements in data and internal capabilities, and alignment with applicable regulatory expectations, including the upcoming CSRD. At this stage, sustainability-related expectations are guided by a combination of Group-level conduct documents and local procedures. As the Group's sustainability governance continues to evolve, further development of the policy structure is expected to support increased consistency and oversight across the organisation.

SUSTAINABILITY-RELATED INCENTIVES SCHEMES GOV-3, E1.GOV-3

The Feralco Group incorporates limited sustainability considerations into incentive arrangements for certain members of management. The structure and implementation of these arrangements currently reflect the organisation's decentralised operating model and may vary across entities and roles.

Where applicable, sustainability-related aspects form part of individual performance objectives and are considered alongside other business priorities. Approximately 10 % of variable remuneration may be linked to sustainability-related considerations, with the specific design and weighting determined at entity level. The terms of the relevant incentive arrangements are approved by the CEOs, Managing Directors and members of the C-suite in their respective line roles.

At present, sustainability-related incentives are primarily based on individual objectives rather than a common set of Group-wide sustainability performance indicators. Climate-related considerations are not currently included as a standalone component in the remuneration for members of the administrative, management or supervisory bodies, and remuneration is not linked to greenhouse gas emission reduction targets under ESRs E1.

As the Group continues to strengthen its sustainability governance, performance management and reporting capabilities, remuneration practices may further evolve to reflect the development of broader sustainability objectives and monitoring frameworks.

RISK MANAGEMENT IN SUSTAINABILITY REPORTING GOV-5

Overview of Reporting-Related Risk Management

The Feralco Group has established internal processes to support the preparation of its sustainability statement. These processes focus specifically on risks associated with the accuracy, consistency and completeness of sustainability information. The approach covers the reporting cycle and does not replace the Group's broader environmental or operational risk management practices, which are handled separately at entity level.

The primary objective of the reporting-specific risk management approach is to ensure that the Group can produce sustainability disclosures that are reliable, comparable and aligned with the requirements of the Corporate Sustainability Reporting Directive. Due to the Group's decentralised structure, there are varying levels of data maturity across the entities. During 2025, the entities have put particular emphasis on defining sustainability reporting responsibilities, clarifying methodologies and improving data quality.

Governance and Allocation of Responsibilities

The risk management process is based on a distributed model. Executive management oversees the overall reporting framework and delegates responsibilities across entities. Data collection, validation and reporting are carried out by designated sustainability reporters within the line organisation. The Sustainability Controller provides central coordination, ensures consistency and performs data reviews, while the Circularity Manager supports technical matters and carries out cross-checks where needed.

Entity-level procedures, including ISO 14001 where applicable, provide supporting controls for environmental data. Internal guiding documents such as the Code of Conduct, the Code of Conduct for Business Partners and the Whistleblower Policy form the broader governance context in which reporting responsibilities are fulfilled. Internal control processes for sustainability reporting are

established at entity level and continue to be refined at Group level. The reporting process is supported by a sustainability reporting platform, which provides a centralised structure for data entry, consolidation and review. Sustainability data is monitored across areas such as energy use, emissions, water consumption, biodiversity-related indicators, workplace safety, diversity and responsible sourcing. Regular follow-ups take place through fortnightly meetings, quarterly reporting cycles, and management discussions.

Risk Identification and Mitigation in Sustainability Reporting

Reporting-related risks are identified throughout the reporting cycle. Key risk types include incomplete or missing data, estimation uncertainty, inconsistency between entities, limited upstream or downstream transparency and challenges associated with data collection timing. Risks are assessed using qualitative and quantitative criteria such as potential impact on reporting reliability, likelihood of occurrence and the feasibility of addressing issues within the reporting period.

Prioritisation is based on a combined assessment of impact and likelihood. Higher-risk areas receive additional scrutiny, including deeper review by the sustainability team and adjustments to methodologies where required.

The most material risks identified in the current reporting period relate to:

- ▶ **Limited availability of upstream and downstream value-chain data.**
- ▶ **Estimation uncertainty where assumptions or proxies are necessary.**
- ▶ **Inconsistent methodologies across legal entities.**
- ▶ **Certain sustainability data are entered manually into the reporting system, which introduces a risk of human error.**
- ▶ **Incomplete internal controls due to the absence of Group-wide policies and harmonised procedures.**

These risks reflect the early stage of The Feralco Group's consolidated sustainability reporting and the Group's decentralised operational structure.

Mitigation measures include harmonisation of data definitions, clearer methodological guidance arising from the double materiality assessment, centralised review and plausibility checks, and the use of supplier assessments. Significant effort is made to validate the data. Nevertheless, differences in local conditions mean that significant variations between production sites are to be expected. As data maturity improves, additional controls are expected to be introduced.

Integration into the Reporting Cycle

Findings from the risk assessments are addressed during iterative data reviews. Material issues are escalated to executive management, and reporting methods or data sources are adjusted when necessary. Improvements in data collection, documentation and transparency form part of the ongoing development of the Group's sustainability reporting capabilities.

Governance-related data such as training completion, supplier audit coverage and incident reporting are only partially tracked at this stage. These gaps are incorporated into the assessment of reporting limitations and uncertainties.

Oversight by the Governing Bodies

The outcomes of the reporting-specific risk assessment form part of the Group's double materiality assessment. Results are reviewed by senior management, approved by the CEOs and validated by the Board of Directors. This ensures that the main limitations, uncertainties and methodological choices are acknowledged at the highest level and are transparently reflected in the sustainability statement.

STAKEHOLDER ENGAGEMENT

SBM-2

Feralco engages with stakeholders on an ongoing basis to support transparent communication across its value chain. Stakeholder groups have been identified based on their relationship to the Group's operations and their ability to influence, or be affected by, The Feralco Group's activities. This included upstream suppliers, downstream customers, the owners, and internal stakeholders such as employees and management.

Ahead of the Double Materiality Assessment, Feralco conducted structured interviews with representatives from these groups to capture a range of perspectives on actual and potential impacts, as well as related risks and opportunities. The engagement focused primarily on stakeholders with direct and regular interaction with The Feralco Group.

Insights from the stakeholder interviews were integrated into the double materiality assessment to ensure that the views of stakeholders were considered in determining the most relevant sustainability matters for reporting.

DOUBLE MATERIALITY ASSESSMENT

IRO-1, E1.IRO-1, E2.IRO-1, E3.IRO-1, E4.IRO-1, E5.IRO-1, G1.IRO-1, IRO-2

Description of process to identify and assess material impacts, risks and opportunities

The Feralco Group carried out its first double materiality assessment (DMA) in accordance with the principles set out in the ESRs in 2023, assessing each sustainability matter through both an impact materiality lens and a financial materiality lens. The process followed a structured scoring approach to ensure consistency, transparency and comparability.

Relevant ESG topics were first identified using sector standards, regulatory requirements and recognised international frameworks. Internal and external stakeholders were then engaged through interviews and a workshop, where potential impacts, risks and opportunities were discussed and scored. Impact materiality was assessed based on scale, scope, irremediability and likelihood, considering both positive and negative, as well as actual and potential impacts. Financial materiality was evaluated based on the financial magnitude, likelihood and nature of potential financial effects. All Impacts, Risks and Opportunities (IROs) were assessed on a gross basis, and a sustainability matter was deemed material if at least one associated IRO exceeded the materiality threshold.

Upstream and downstream impacts were prioritised based on severity and likelihood, and stakeholder feedback was incorporated throughout the process. Input parameters included topic relevance, stakeholder expectations, regulatory and market trends and industry benchmarks.

The scoring outcomes and final materiality conclusions were reviewed and validated in a workshop with the CEOs and other relevant stakeholders, and internal controls ensured that the process was documented and aligned with ESRs requirements. In 2024 the original DMA was reviewed by the sustainability team and minor updates were made. It is based on this DMA that Feralco has done its 2025 ESRs reporting. Annual updates and periodic methodological reviews are planned to ensure continued alignment with regulatory developments and improved data availability.

Identification and assessment of ESRs topics

This section complements the earlier description of the overall DMA methodology by explaining the topic-specific assessment processes and summarising the conclusions reached for each ESRs standard. All topics – material and non-material – are included for transparency, as required by ESRs 2.

Climate change (ESRS E1)

The Feralco Group identified and assessed climate-related impacts, risks and opportunities based on the full value chain coverage applied in the DMA as material. In addition to the ESRs required process, the company collaborates with INCOPA to analyse produc-specific carbon footprints across manufacturing, transport and upstream sourcing. This enables more precise estimation of scope-related emissions and contributes to its evidence base for assessing climate-related impacts under ESRs E1 and ESRs 2 IRO-1.

The assessment confirms material impact through actual GHG emissions and energy use in manufacturing and transportation (upstream, own operations and downstream), as well as financial materiality through risks such as exposure to increased carbon prices, volatile energy markets and physical climate hazards affecting several sites. Opportunities, including the potential to reduce emissions and energy costs through efficiency and renewable energy solutions, are also assessed as financially material. These findings are supported by the value chain IROs documented in the DMA.

OVERVIEW OF DMA RESULTS (MATERIAL IMPACTS, RISKS AND OPPORTUNITIES) IN ACCORDANCE WITH ESRs

Material sustainability topcis and subtopcis	Value chain location	Impact	Financial opportunity/risk	IROs identified	IROs material
ESRS E1 - Climate Change				8	8
Climate change adaptation	●		▲	–	2
Climate change mitigation	↗ ● ↘	●	■ ▲	–	3
Energy	●	●	■ ▲	–	3
ESRS E2 - Pollution				12	3
Microplastics	↘	○	■	–	1
Pollution of living organisms and food resources		● ○		–	1
Pollution of water	↗ ● ↘	● ○	▲	–	1
ESRS E4 - Biodiversity and ecosystems				15	11
Direct impact drivers of biodiversity loss	↗ ● ↘	● ●	■ ▲	–	3
Impacts and dependencies on ecosystem services	↗ ● ↘	●	■ ▲	–	2
Impacts on the extent and condition of ecosystems	↗ ● ↘	● ●	■ ▲	–	3
Impacts on the state of species	↗ ● ↘	● ●	■ ▲	–	3
ESRS E5 - Circular economy				11	6
Resource inflows, including resource use	↗ ●	●	■ ▲	–	2
Resource outflows related to products and services	↘	●/○	■ ▲	–	3
Waste	↗ ●	●	■ ▲	–	1
ESRS S1 - Own workforce				13	4
Working Conditions	●	○ ○	■ ▲	–	4
ESRS S2 - Workers in the value chain				13	4
Working conditions	↗	○	▲	–	4
ESRS S3 - Affected communities				10	3
Communities' economic, social and cultural rights	↘	●/○	■	–	3
ESRS G1 - Business conduct				12	1
Corporate Culture	↗ ● ↘	○	▲	–	1

● Own operations ↗ Upstream ↘ Downstream ● Actual positive ○ Potential positive ● Actual negative ○ Potential negative ■ Opportunity ▲ Risk

Figure 2. Overview of DMA results (material impacts, risks and opportunities) in accordance with ESRs

Pollution (ESRS E2)

The Feralco Group’s process for identifying pollution-related impacts, risks and opportunities is closely aligned with the operational realities of the chemical sector. The company analyses pollution sources across upstream sourcing, manufacturing, downstream transport, use of products in water treatment and end-of-life stages. The DMA identifies actual and potential negative impacts associated with emissions to air, risks of spills and leakages to water and soil, and pollution affecting living organisms and food resources. Where relevant, positive contributions are also considered – for example, the potential to enable removal of microplastics in wastewater.

The identification process includes internal expert workshops, review of incident data, assessment of environmental dependencies and risks, and cross-checking with regulatory developments. Based on this analysis, pollution is found to be a material topic for The Feralco Group.

Water and marine resources (ESRS E3)

Although water is an essential input for The Feralco Group’s operations, the results of the DMA show that impacts, risks and opportunities related to water and marine resources do not meet the company’s thresholds for materiality. Feralco evaluated water-related dependencies, potential

upstream spill risks, water use in manufacturing, and possible impacts on marine ecosystems. These were found to have low likelihood, low or reversible severity, and limited financial effect. Opportunities related to marine restoration or water efficiency were also assessed as non-material compared with the company’s higher-impact topics. The DMA also considered the Feralco Group’s contribution to drinking water production, wastewater treatment and water reuse through its products and technologies, and these contributions were also reflected through positive impacts on affected communities (see ESRS S3).

The assessment nevertheless concludes that E3 is not material and does not require full ESRs topical disclosures.

Nevertheless, The Feralco Group continues to maintain responsible water management practices and monitor water use and discharge, with several sites implementing optimisation, reuse, and closed-loop solutions to reduce wastewater and limit pressure on local water resources.

Biodiversity and ecosystems (ESRS E4)

The Feralco Group’s process for identifying biodiversity-related impacts, risks, dependencies and opportunities includes site-specific assessments, engagement with local experts and review of op-

erational activities that may affect ecosystem health. The DMA highlights both negative impacts (e.g. pollution and ecosystem degradation associated with chemical handling, sourcing and transportation) and positive contributions (e.g. biodiversity restoration through lake restoration and water treatment services). Several biodiversity-related IROs were assessed as material due to their scale, likelihood and relevance across both upstream and downstream activities.

Some Feralco sites are located near areas with biodiversity sensitivity. Although criteria for proximity are not always clearly defined at regulatory level, Feralco acknowledges these interactions and applies mitigation measures where necessary. Based on this assessment, the company concludes that biodiversity-related mitigation actions are required at selected sites. ESRS E4 is therefore a material topic.

Resource use and circular economy (ESRS E5)

Resource inflows, outflows and waste generation are central to The Feralco Group’s operations. The company’s assessment under ESRS E5 and ESRS 2 IRO-1 focuses on analysing dependencies on critical raw materials, risks of supply disruptions, the impacts of waste streams, and opportunities for circularity such as recovery of aluminium or iron from sludge and the increased use of by-products as input materials.

Several IROs in this area were assessed as material (including resource use, circular recovery opportunities and waste-related impacts), driven by their relevance to operational continuity, cost exposure and environmental impact.

Own workforce (ESRS S1)

The assessment of S1 focuses on working conditions, health and safety risks associated with manufacturing and transport of chemicals, and broader workforce well-being. The DMA identifies material impacts related to employee health and safety, and positive impacts linked to enhanced working conditions and employee well-being. Financially material opportunities relate to talent retention and reduced turnover. ESRS S1 is therefore considered material.

► As a company operating in the chemical industry, the protection of workers and the environment is paramount and embedded in how Feralco operates.

Feralco evaluated its upstream and downstream value chain for risks related to labour rights, working conditions and human rights, especially in regions where legal protections may differ from European standards. The DMA identified potential negative impacts on workers in the value chain, including health and safety concerns linked to chemical handling and limited transparency in supplier labour practices. Working conditions in the value chain were assessed as material based on impact related criteria.

Other subtopics under S2, such as equal opportunities and other work-related rights, did not meet the thresholds for materiality.

Affected communities (ESRS S3)

The Feralco Group’s products play a significant role in water and sanitation services. The DMA identifies material positive impacts on communities’ economic, social and cultural rights, particularly downstream where clean water access is improved through Feralco technologies.

Other S3 subtopics, such as working opportunities or consumer-related risks, did not reach material thresholds. ESRS S3 is therefore partially material, with the material IROs related specifically to water and sanitation.

Consumers and end-users (ESRS S4)

The DMA identified potential negative impacts related to consumer and end-user safety, such as the risk of incorrect handling of chemicals due to insufficient information. However, these risks are assessed as low in severity, low in likelihood and limited to narrow downstream situations. No significant financial effects were identified. As a result, the assessment concludes that S4 is not material.

Business conduct (ESRS G1)

The Feralco Group identifies business conduct impacts, risks and opportunities by assessing the nature of supplier activities, geographic risk exposure, transaction types and compliance with the company’s Business Code of Conduct. The company monitors performance through supplier as-

sessments, occasional audits and confidential reporting channels, applying zero tolerance for corruption and bribery. From this assessment, the topic is judged material, particularly regarding corporate culture and ethical conduct in own operations.

As with all materiality judgements, the company must draw a clear boundary based on defined criteria and the available evidence. As data availability increases, methodologies mature, and business conditions evolve, the results of the DMA are expected to develop over future reporting cycles. At this stage, however, the assessment shows that the evidence for E3 Water and marine resources and S4 Consumers and end-users does not meet the thresholds for impact or financial materiality under the ESRs. These topics are therefore not included as material disclosures in this reporting cycle, although Feralco will continue to monitor them where relevant to operational management.

BASIS FOR PREPARATION

BP-2

This section summarises the specific circumstances, assumptions and limitations that inform the preparation of the sustainability statement. It supports readers in understanding how the underlying data has been compiled, including the use of estimates, uncertainties, and methodological considerations.

Time horizons

The Group has not deviated from the ESRs definitions of short-, medium- or long-term time horizons. The disclosures reflect the standard ESRs time-horizon framework.

Use of estimated data in the value chain

Several quantitative metrics – primarily those related to upstream and downstream value-chain activities – include estimated data. Estimates have been applied in cases where primary data is not yet available, cannot be obtained proportionately, or relies on external sources such as supplier information, recognised secondary datasets or sector-based proxies. Estimated data is particularly relevant for selected Scope 3 greenhouse gas emission categories and related value-chain indicators.

The Group considers these estimates to provide a reasonable representation of its impacts, risks and opportunities at the time of reporting. Work to improve the completeness and quality of value-chain data is ongoing, including increased supplier engagement and progressive substitution of estimated inputs with primary data where feasible.

Basis for preparation and level of accuracy

Some disclosures are subject to measurement uncertainty due to:

- Reliance on third-party value-chain data
- Use of recognised emission factors, sector averages and other proxies
- Inherent uncertainty in assumptions related to future developments
- The use of emission factors and their inherent estimation-based nature.

Assumptions, data sources and methodological choices are described alongside the relevant metrics. Forward-looking information, including targets and transition-related disclosures, is inherently uncertain and may be affected by external developments beyond the Group’s control.

Measurement uncertainty

Several reported quantitative metrics are subject to a high level of measurement uncertainty. In particular, certain Scope 3 emissions relating to purchased goods rely on:

- A mix of user-specific data, supplier information and database values
- Proxy data for a limited number of raw materials
- Supplier-specific characterisation factors (CIFs) with varying data quality

In cases where proxy or average values are used, these represent a small share of total purchased goods but influence the precision of the corresponding disclosures. The level of uncertainty is driven by varying data quality, regional differences, methodological assumptions in life-cycle assessments, or simply the absence of reliable primary data. In accordance with ESRS 2 BP-2, these uncertainties and assumptions are transparently disclosed to support comparability and reliability.

ENVIRONMENTAL INFORMATION

E1 CLIMATE CHANGE

TRANSITION PLAN

E1-1

The Feralco Group has to date not adopted a detailed transition plan for climate change mitigation. However, the Group is in the process of establishing the analytical and organisational foundations required to support future climate target-setting and transition planning. This work is supported by the implementation of carbon-accounting tools, improved value-chain data collection, and product-level life-cycle assessments conducted in cooperation with INCOPA. These activities are enabling a clearer understanding of the Group's greenhouse gas emissions and the levers available to reduce them.

During 2026, the Feralco Group intends to further develop its climate approach by clarifying Scope 1, Scope 2 and Scope 3 greenhouse gas reduction targets and developing abatement plans at Group, country and production-site level. These plans will be based on the 2025 emissions baseline and will define transition actions to support the Group's longer-term climate ambition.

Early assessments from 2023 showed that 80–85 % of total emissions originate from upstream raw-material sourcing for the production of coagulants. As a result, supplier engagement, procurement decisions and material substitution constitute the most significant levers for long-term decarbonisation. These measures are complex, as they involve multiple boundary conditions, technical constraints and potential goal conflicts across the value chain.

In parallel, the Group is implementing measures to reduce emissions in its own operations and advancing several mitigation measures that support future decarbonisation. Current efforts focus on improving energy efficiency at production sites, increasing the use of renewable technologies where technically and economically feasible and strengthening the measurement and reporting of Scope 1, Scope 2 and selected upstream Scope 3 emissions. Feralco is also assessing whether an internal carbon price could support lower-emission investment decisions.

Lifecycle considerations are incorporated into product-development activities, and the Group continues to pursue selected circularity and end-of-life recovery initiatives where relevant. Collaboration with upstream suppliers remains important given the high share of emissions linked to raw materials. Existing environmental governance structures, including ISO 14001 and IPPC compliance, support this work.

At this stage, the Group has not established a dedicated financial plan, investment roadmap or Paris-aligned decarbonisation pathway. Such elements are expected to be further developed once data quality and analytical foundations have progressed sufficiently. The Group intends to establish a formal transition plan in due course.

IMPACTS, RISKS AND OPPORTUNITIES

SBM-3, E1.SBM-3, E1-9

Climate change is a material topic for The Feralco Group because the company operates chemical manufacturing and transport activities and maintains production facilities that are exposed to physical climate risks. The assessment has identified actual negative impacts on the climate through greenhouse gas emissions and energy use across upstream suppliers, The Feralco Group's own operations and downstream distribution. At the same time, climate change also creates financially material risks, including potential increases in costs linked to new climate regulation on emissions, higher and more volatile energy prices and the risk of operational disruption where plants are located in areas exposed to rising sea levels and extreme weather events. In addition, actions taken to reduce emissions and improve energy performance may create business opportunities, including enhanced competitiveness, alignment with customer requirements, and lower long-term operating costs. Taken together, these environmental and financial effects mean that E1 – Climate change is material for Feralco and requires transparent reporting under ESRS.

IMPACTS, RISKS AND OPPORTUNITY MANAGEMENT

Policies

E1-2, MDR-P

Feralco manages its material climate-related impacts, risks and opportunities through the Group's sustainability strategy, which functions as the overarching policy framework for all entities. The strategy, described in the general governance section (Strategy, business model and value chain),

covers climate change mitigation and adaptation, energy efficiency and the deployment of renewable energy. It sets out the Group's approach to reducing greenhouse gas emissions across Scopes 1, 2 and 3, improving energy efficiency, increasing the use of renewable energy and addressing upstream emission drivers through responsible sourcing. Climate-related aspects are embedded in strategic decision-making, supported by the use of environmental performance indicators and alignment with relevant management systems such as ISO 14001.

ACTIONS

E1-3, MDR-A

Across The Feralco Group, climate-related actions have been implemented addressing its material impacts, risks and opportunities related to E1 – Climate change. Some actions can be carried out using internal resources, while measures such as solar photovoltaic (PV) installations, renewable power sourcing, fossil-free transportation and major efficiency upgrades depend on the availability of capital, suppliers and technology. Other measures, including electrification and site-level adaptation, rely primarily on internal prioritisation and operational capacity.

Completed and ongoing actions

Current mitigation actions focus on renewable electricity, fuel switching, electrification and efficiency improvements. During 2025, Solar PV systems have been installed in Spain at Feralco Iberia's plants in Valdemoro and Alegia and in Italy at Feralco Italia's Millesimo plant. Additional PV projects are in progress for sites in Spain, France and the Netherlands. In Germany, Feralco Deutschland is evaluating a transition to renewable electricity, and the UK entity is considering following suit. Fuel switching to renewable diesel (HVO) continues in Spain for Feralco Iberia, with further potential in for example the Netherlands and the UK; In Sweden, Feralco Nordic's main transport supplier has operated fossil free for several years.

Around half of the sites in The Feralco Group have already replaced diesel forklifts with electric alternatives. This is further complemented by energy efficiency upgrades such as inverters, higher efficiency motors and strengthened energy management systems across the Group. Product-level actions include reduced use of high footprint-inputs in coagulants.

For adaptation, Feralco Iberia in Spain is planning measures to address site-specific flood risks.

Planned actions

Planned measures extend the same levers into future reporting periods. These include additional PV installations, further energy efficiency upgrades, the continued HVO rollout, and recipe optimisation initiatives in Spain and the Netherlands during 2026–2027. Larger scale renewable projects are planned for the Netherlands from 2027 onwards. Adaptation measures at Iberian sites are also scheduled for 2026.

Expected outcomes

Emission reduction impacts are not yet quantified at Group level, as emissions data, methodologies and reduction measures continue to be harmonised. Nevertheless, the actions underway indicate key decarbonisation pathways. Expanded PV capacity and renewable electricity sourcing are expected to contribute to lower Scope 2 emissions, while the use of HVO and transport optimisation may reduce fuel related emissions. Electrification and efficiency upgrades are expected to decrease electricity use and associated emissions. Recipe changes are expected to reduce upstream Scope 3 intensity over time. Adaptation-focused measures strengthen operational resilience but are not expected to directly reduce greenhouse gas emissions.

Scope and boundaries

The climate change mitigation actions primarily concern The Feralco Group's own operations, including production sites, equipment, energy sourcing and fleet decisions.

OpEx and CapEx requirements

At this stage, implementation of the action plan does not require significant Group-level OpEx or CapEx allocations, although some entity level measures are dependent on available investment resources.

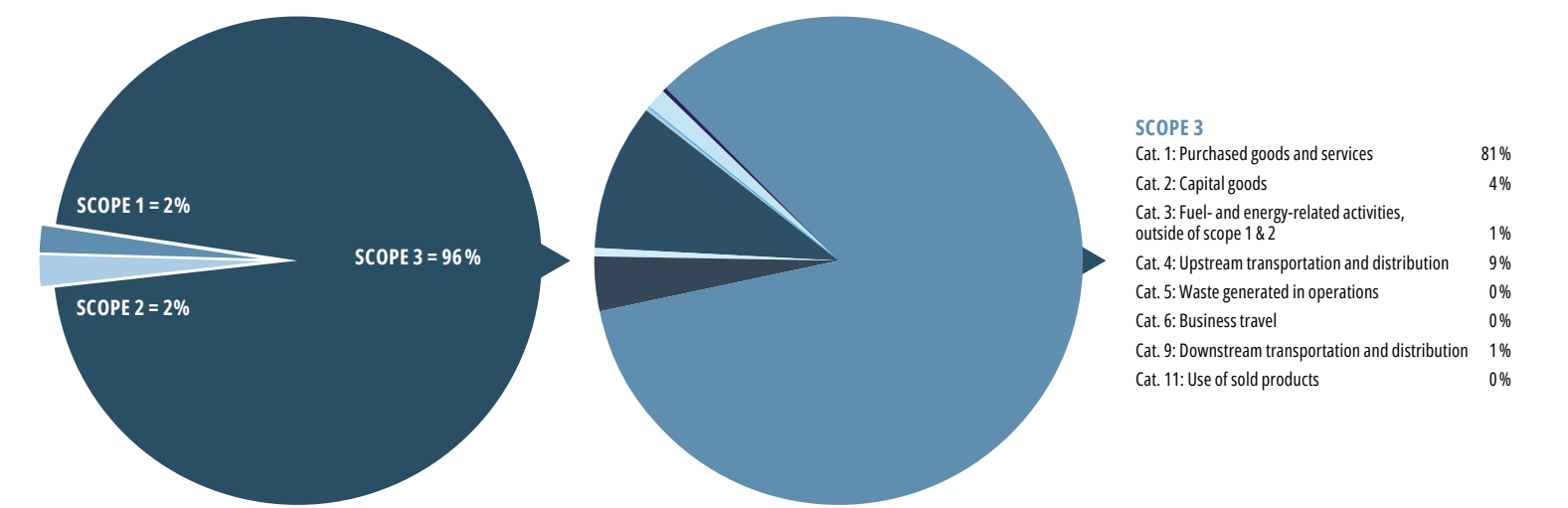


Figure 3. Share of Total Emissions by Source (tCO₂e), 2025

Limitations

Addressing the Group's contribution to climate change is expected to require a significant focus on emissions arising from Scope 3 Category 1, which indicates a significant share of the overall greenhouse gas footprint. While some reductions are already achieved through recipe adjustments, the most material potential lies in shifting to raw materials with inherently lower climate impact. Such changes are associated with additional cost, and the ability to pass on or share these costs with customers is limited.

The Company already has a comparatively low Scope 1 and Scope 2 greenhouse gas emissions footprint, reflecting the nature and development of its operations over more than 20 years.

PERFORMANCE

Targets

E1-4, MDR-T

Prior to 2025, the Group used carbon footprint estimates based on available product life-cycle data and sales volumes to support the identification of emission hotspots and potential reduction opportunities.

The first emission assessment (2023) estimated 150 ktonnes CO₂e consolidated carbon footprint and was based on a representative operational year and calculated using a cradle-to-customer-gate boundary using INCOPA life-cycle data. This assessment served as an early reference point for evaluating decarbonization opportunities and provided a reference point for the reduction targets and the Group's climate ambition.

In 2025, The Feralco Group implemented structured carbon accounting in line with the GHG Protocol, providing a more comprehensive understanding of emissions across Scope 1, Scope 2 and Scope 3 categories. This establishes 2025 as the baseline year for the development of greenhouse gas reduction targets and abatement plans from 2026 onwards covering Scope 1, Scope 2 (market-based) and upstream Scope 3 emissions.

The application of consistent methodologies, harmonized system boundaries and sustainability reporting software across the Group strengthens the quality and comparability of emissions data. This enables a more robust assessment of emission sources and reduction opportunities and supports the ongoing refinement of climate targets and abatement plans.

Developments in baseline understanding

During 2025, the first full cycle of bottom-up sustainability reporting from individual legal entities and production sites produced a more detailed emission profile, resulting in an aggregated footprint of approximately 180 ktonnes CO₂e. This higher value reflects several factors:

- Higher sales and production volumes in the reporting year.
 - Refined and more granular calculation methods at entity level.
 - Remaining uncertainty in several Scope 3 categories due to data availability and use of proxies.
- The updated distribution across scopes is approximately 2% Scope 1, 2% Scope 2, and 96% Scope 3 (upstream and downstream). This deeper level of reporting has improved transparency but also indicates that the baseline emissions may need to be reassessed. The Group therefore ac-

knowledges that further refinement of its baseline may be required as methodologies and data quality continue to mature.

DECARBONISATION LEVERS

During 2025, the accounting method of the Group's GHG emissions was refined in line with the GHG protocol. However, the 2023 emissions estimate had already indicated that reductions in upstream raw-material emissions, increased use of recycled and by-product materials, improved energy efficiency, and greater use of renewable electricity were likely to represent important decarbonisation opportunities. Transport optimisation, lower-impact product applications and emerging solutions such as circular-material innovations and enhanced supplier engagement are also considered potential contributors to future emissions reductions. The 2025 data generally support these observations.

From 2030, carbon offsetting projects may also be considered in the longer term for residual emissions that are difficult to reduce, as a complement to, not a substitute for, actual decarbonisation. The Feralco Group prioritises direct emission reductions and value-chain improvements.

GHG-reduction targets

The Group has set an ambition to reduce CO₂e emissions, with a 2035 reduction pathway currently indicated at 20–40% from a 2025 base year. During 2026, the Group will continue developing Scope 1, 2 and 3 abatement plans at country, production site and Group levels, helping to translate this ambition into actionable measures and supporting its longer-term goal of climate neutrality by 2050.

Consistency with GHG-inventory boundaries

The reduction targets will apply the same scope definitions and system boundaries as the Group's GHG inventory. All data is consolidated through the sustainability reporting software, ensuring that the baseline, annual emissions and progress towards targets are reported using consistent methods. This prevents local variations in scope boundaries and safeguards alignment between entity-level reporting and Group-level targets.

Methodological improvements and potential refinements

Data quality and system control are expected to improve over time through enhanced reporting maturity and a growing share of primary data from key suppliers, such as supplier-specific emission factors. These developments are expected to support more accurate emissions profiling and may lead the Group to revisit or refine its baseline and target architecture. In parallel, the Group may consider alignment with 1.5 °C reference pathways as methodological maturity increases.

Even when setting the base year as 2025 based on more structured data, it may be required to make revisions to the future targets as data quality and calculation methodologies continue to mature. Yet with reference to the estimate for 2023, and the reporting in line with the GHG protocol, The Feralco Group now goes forward and sets targets on all levels.

The 2023 estimate was calculated using a sales-based approach (cradle to customer gate) and

was not prepared in accordance with the GHG Protocol. The estimate was derived from sales statistics by multiplying total sold volumes (tonnes of product) by applying product-specific emission factors expressed as kg CO₂e per tonne of product. These emission factors were based on available climate impact factors, CIF, or product carbon footprint, PCF, data.

For 2025, emissions were calculated using the Group's carbon accounting tool, applying a bottom-up approach in line with the GHG Protocol. Purchase and activity data are reported at entity level. Emissions are calculated by multiplying incoming materials, energy use and other activities by relevant emission factors. These emission factors include supplier-specific data where available. Transportation activities within the Group's operational control are also included. At present, this GHG Protocol-based dataset is available for 2025 only.

As the methodologies, data sources and system boundaries differ, the results are not directly comparable. Nevertheless, both approaches indicate a greenhouse gas footprint of a similar order of magnitude and identify similar emissions drivers at Group level. Both approaches provide an estimate of The Feralco Group's greenhouse gas footprint and indicate a cradle-to-gate footprint in the range of approximately 175–185 ktonnes CO₂e for 2025. This level is higher than the 2023 estimate due to both methodological differences and changes in the business. Year-to-year variation in emissions reflects several factors, including sales volumes, product mix, organic growth and, to some extent, improvements in the quality and specificity of emission factors.

When expressed as portfolio-level carbon intensity, both approaches produce broadly comparable results relative to the Group's total product output, slightly above 0.2 kg CO₂e per kg of sold product as an average.

Science-based assessment

At this stage, the Group's targets are not science-based and have not been assessed against a 1.5 °C scenario. No sector-specific pathway has yet been identified for reference.

METRICS

Energy consumption

E1-5, E1-6, E1-7, E1-8, MDR-M

As 2025 is the first year for which a consolidated Group level sustainability report has been prepared, no comparable Group level data from previous years is available for energy consumption or energy mix.

High climate impact sector

Feralco operates in a sector with high climate impact and acknowledges its responsibility to address climate related impacts. In accordance with ESRS 1 Appendix C, the Group is classified as operating in a high climate impact sector, as chemical manufacturing (NACE C20) is identified among sectors with elevated climate relevance.

During the reporting period, Feralco generated total revenues of 2 532 MSEK. The Group operates entirely within a high climate-impact sector, and consequently 100 % of revenue is generated from activities within this sector. This revenue figure is used as the denominator for the calculation of the Group's energy and greenhouse gas emissions intensity metrics.

GHG emissions

Since 2025 is the first year in which a consolidated Group level sustainability report is prepared, no comparable Group level data from previous years is available for GHG emissions.

ACCOUNTING PRINCIPLES

E1-4 Targets related to climate change mitigation and adaptation

At this stage, no additional methodologies, assumptions or accounting considerations have been provided for E1 4 beyond those included in the main disclosure. No supplementary contextual information is applied here.

E1-5 Energy consumption and mix

The Feralco Group systematically collects and records energy consumption and energy mix data at the local level, corresponding to each site or legal entity. Wherever available, more precise carbon data, rather than spend-based estimates, are utilised to enhance accuracy. A sustainability reporting software solution is used to support data collection, management and reporting. At present, fossil energy sources are reported on an aggregated basis and are not consistently differentiated by fuel type across all entities.

Methodology

E1-6 Gross Scope 1, 2, 3 and Total GHG Emissions

Greenhouse gas emissions are calculated by multiplying activity data by relevant emission factors.

- Scope 1 and Scope 2 activity data are reported locally by each site or legal entity in the sustainability reporting software.
- Scope 3 activity data are also entered locally, with the exception of Category 1: Purchased Goods and Services. For this category, quantities of incoming raw materials are automatically imported based on invoice records, providing alignment with procurement data and reducing the risk of transcription errors.

Emission factor sources

Emission factors are sourced from a combination of:

- The sustainability reporting software's emission factor library, including Defra, IEA, AIB, Exiobase and NTM.
- Ecoinvent, primarily for raw materials, chemicals and other process related factors.
- Supplier specific emission factors, particularly for electrical energy and other disclosures where the supplier provides documented data.

- Proxy estimates for a small number of raw materials where no suitable factor is available from recognised databases or supplier data. Such estimates were developed using comparable materials, industry knowledge and available technical information, and were subject to internal review and validation.

Rationale for selection of emission factors

Emission factors are selected based on:

- Representativeness and methodological transparency of the underlying dataset.
- Availability of supplier-specific information that better reflects local energy generation or material production conditions.
- Ability to match raw materials to life cycle based factors, particularly for coagulants.
- The need for complete coverage of all material emission sources.

Precision and uncertainties

The precision of emission factors varies. Some broad-average factors may deviate significantly from real-world conditions, while supplier specific or well documented LCA factors are more accurate. Based on judgement, the average uncertainty of the emission factors is estimated to lie within ±25 percent. A small number of proxy factors introduce additional estimation uncertainty.

Summary of Emission Factors Utilised for Scope 1, 2, and 3 Greenhouse Gas (GHG) Emissions and Justification for Their Selection
Complementary Information for ESRS E1-6: Emission Factors Applied in GHG Calculations

To quantify Scope 1, 2, and 3 greenhouse gas (GHG) emissions, a comprehensive suite of emission factors has been employed. These factors have been sourced predominantly from authoritative

The Feralco Group GHG emissions per scope, 2025	(ktonnes CO ₂ e)
Gross Scope 1 GHG emissions	4.1
Gross Scope 2 Location-based GHG emissions	3.0
Gross Scope 2 Market-based GHG emissions	3.7
Gross Scope 3 GHG emissions	174
Biogenic Scope 1 emissions	1.9
Biogenic Scope 2 (location-based) emissions	0
Biogenic Scope 2 (market-based) emissions	0
Biogenic Scope 3 emissions	0

Figure 5. The Feralco Group GHG emissions per scope, 2025
In 2025, 34 % of Scope 2 GHG emissions were covered by contractual instruments.

The Feralco Group GHG emissions intensity per revenue, 2025	(tonnes CO ₂ e/SEK)
Total GHG emissions (location-based) per net revenue	0.07
Total GHG emissions (market-based) per net revenue	0.07

Figure 6. The Feralco Group GHG emissions intensity per revenue, 2025
Expressed differently, the metric equates to approximately 14 SEK per tonne of CO₂e.

Energy consumption and mix	2025
(1) Fuel consumption from coal and coal products (MWh)	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	1 200
(3) Fuel consumption from natural gas (MWh)	7 600
(4) Fuel consumption from other fossil sources (MWh)	0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	9 400
(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	18 200
Share of fossil sources in total energy consumption	58 %
(7) Consumption from nuclear sources (MWh)	1 900
Share of consumption from nuclear sources in total energy consumption	6.1 %
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	6 600
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	3 400
(10) The consumption of self-generated non-fuel renewable energy (MWh)	40
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	10 000
Share of renewable sources in total energy consumption	32 %
Total energy consumption (MWh) (the sum of lines 6, 7, and 11)	30 300

Figure 4. Energy consumption and mix, 2025

The Feralco Group GHG emissions, 2025	(ktonne CO ₂ e)
Gross Scope 1 GHG emissions	4.1
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	N/A
Gross location-based Scope 2 GHG emissions	3.0
Gross market-based Scope 2 GHG emissions	3.7
Total Gross indirect (Scope 3) GHG emissions	174
1 Purchased goods and services*	147
2 Capital goods	6.3
3 Fuel and energy-related Activities (not included in Scope1 or Scope 2)	1.1
4 Upstream transportation and distribution	17
5 Waste generated in operations	0.31
6 Business travel	0.11
7 Employee commuting	N/A
8 Upstream leased assets	N/A
9 Downstream transportation and distribution	2.6
10 Processing of sold products	N/A
11 Use of sold products	0.01
12 End-of-life treatment of sold products	N/A
13 Downstream leased assets	N/A
14 Franchises	N/A
15 Investments	N/A
Total GHG emissions	
Total GHG emissions (location-based)	180
Total GHG emissions (market-based)	182

Figure 7. The Feralco Group GHG emissions, 2025

***Note: Category 1 currently covers emissions from purchased raw materials and traded goods only. Packaging materials, services and raw materials for the Eco 92 business in Italy are excluded due to data unavailability.**

bodies including DEFRA (2024, 2025), IEA (2024), AIB (2024), NTM (2024), IPCC (2014), alongside other reputable databases. The selection criteria emphasize adherence to internationally recognised methodologies, regular data updates, and applicability to the company’s operational context.

Scope 1 Emission Factors

- **Stationary Combustion:** DEFRA (2024) emission factors specific to fuels such as diesel, LPG and natural gas were utilised, reflecting their precision and periodic revision.
- **Company Vehicles:** DEFRA (2024, 2025) emission factors for diesel, petrol, LPG, and biofuels were selected due to their sector-specific relevance and accuracy.
- **Fugitive Emissions (Refrigerants):** DEFRA (2024) emission factors, including R410A and R22, were chosen for their comprehensive coverage of commonly employed refrigerants.

Scope 2 Emission Factors

- **Purchased Electricity:** Country-specific emission factors were sourced from IEA (2024), AIB (2024), and DEFRA (2021) to accurately represent regional grid mixes.
- **Purchased Heating, Cooling, and Steam:** Factors provided by DEFRA (2024), Energiföretagen (2023), and national agencies were utilised to represent district heating and cooling emissions.

Scope 3 Emission Factors

- **Purchased Goods and Services:** Emission factors have been applied for raw materials using data from recognised databases such as Ecoinvent, supplemented by life cycle assessment studies (notably for coagulants) and supplier-provided information. For certain raw materials lacking direct data, proxy estimates were employed.

- **Capital goods:** Factors from Exiobase have been applied for capital goods using a spend based approach using categorisation in accordance with the financial reporting.
- **Transportation (Inbound/Outbound):** NTM (2024) factors were selected for diverse transport modes including truck, sea, and rail, valued for their granularity and European relevance.
- **Waste Generated in Operations:** DEFRA (2024) emission factors for landfill, recycling, and other waste categories were utilised to align with best practices and ensure comparability.
- **Business Travel:** Emission factors from DEFRA (2024) and NTM (2018) for air, rail, road, and ferry travel were applied, reflecting current updates and conformity with GHG Protocol guidance.

Own Produced Energy

IPCC (2014) factors for renewable energy sources (hydropower, solar, wind, geothermal) were applied and set to zero, consistent with their negligible direct greenhouse gas emissions. This applies at present only for solar power.

Rationale for Selection

The emission factors were selected based on their authoritative credibility, frequency of updates, and strict alignment with international standards, including the GHG Protocol and ESRS requirements. Preference was given to country- and activity-specific factors to maximize the accuracy and relevance of the emissions data relative to the company's operations and value chain. This approach ensures consistency, reliability, and transparency in the calculation and reporting of GHG emissions. The Group uses a sustainability reporting software to collect, consolidate and manage sustainability data across its entities. Emissions calculations are performed using methodologies and emission factors defined in accordance with the GHG Protocol.



Additionally, a series of Excel-based tools are utilised for the automated import of purchased goods and services, facilitating the conversion of purchase data extracted from the ERP system. In this process the different goods are assigned an emission factor using the above-mentioned criteria which is imported along with the amount purchased.

The Feralco Group conducted a Scope 3 GHG emission screening across all 15 categories defined by the GHG Protocol to identify which categories are relevant to the Group and to determine the potential significance of each source. The screening involved reviewing the activities in the value chain, information demands from stakeholders, available data, supplier information, internal processes, and financial purchases. Each category was assessed for relevance, data availability, and estimated materiality. Based on this assessment:

- **Relevant and material categories were prioritised for calculation, including purchased goods and services, upstream transportation and distribution, fuel- and energy-related activities, waste generated in operations, business travel, and downstream transportation and distribution.**
- **Categories not relevant to The Feralco Group’s business model – such as processing of sold products, use of sold products, and end-of-life treatment of sold products – were screened out due to the nature of the products (industrial chemicals primarily used as inputs in water treatment processes).** Wherever available, the Scope 3 greenhouse gas (GHG) emissions are quantified using actual activity data obtained from suppliers within the upstream value chain and from customers or distributors within the downstream value chain. In instances where such data is not yet reliably accessible, estimates are employed or generic emission factors to ensure comprehensive measurement. During 2025, 21 % of the Scope 3 emissions were calculated using primary data. Emission factors for purchased goods are generally defined on a cradle-to-gate basis, where the

gate is the economic transfer point. This means the goods can be delivered at Feralco’s gate, transportation included or not, but normally it would be the supplier’s physical plant gate (as transportation is normally paid for separately).

Specific activity data is applied where feasible. The total estimate is however largely based on data from databases and estimates as described above, which introduces a degree of uncertainty. Increasing the availability of supplier-specific (primary) data remains a priority, and ongoing supplier engagement is expected to improve data quality and calculation accuracy over time.

Significant Scope 3 GHG emissions

Significant Scope 3 GHG emission categories and their reporting boundaries, calculation methods, and calculation tools:

Scope 3, Category 1: Purchased goods and services

- Only raw materials are covered. As the majority of products are delivered as bulk chemicals, the impact from packaging material is limited and excluded.
- Calculated using purchase data of raw materials taken from invoices from suppliers. This means the volumes are very accurate, however as mentioned the estimated climate impact factors (“carbon footprint”) are not equally precise.
- The majority of products are delivered in bulk, typically by trucks. A smaller volume of products is shipped in drums, IBCs or sacks, yet packaging has not been included in The Feralco Group’s reporting on purchased goods and services, as its estimated carbon footprint is considered immaterial.
- As services are considered to have marginal emission footprints for The Feralco Group, these have not been included in the calculations of this category.

Scope 3, Category 2: Capital goods

- Calculated using the spend-based method with emission factors mapped against investment spend data on categories “Land and water”, “Equipment”, “Buildings and constructions”, “Land improvements”, “Plant and Machinery”, and “Leasehold equipment” for each of The Feralco Group’s legal entities.

Scope 3, Category 3: Fuel- and energy-related activities not included in Scope 1 or Scope 2

- Calculated automatically in the sustainability reporting software by applying upstream emission factors to the same fuel and electricity data used for Scope 1 and 2. This captures the emissions created before the energy reaches its point of use, such as in production, extraction and delivery, including transmission losses. The calculation uses either supplier-specific or average emission factors, which are applied automatically to Scope 1 and 2 data in the platform and reported separately in line with the GHG Protocol and ESRS.

Scope 3, Category 4: Upstream transportation and distribution

- Calculated primarily using the distance-based method by entering data on tonne-km transported. Where pre-calculated emission data is available from transport suppliers, it is used, improving the accuracy of the calculations. For a small number of transport activities where neither supplier-specific emissions data nor distance-based calculations are available, emissions are estimated using the spend-based method.

Scope 3, Category 5: Waste generated in operations

- Calculated primarily using the waste-type specific method. In cases where such data is available, the supplier-specific method is used. In some cases where no other reliable data is available, the average-data method is used.

Scope 3, Category 6: Business travel

- Calculated primarily using the distance-based method. Where such data is available, pre-calculated emission data is used. In some cases where no other data is readily available, the spend-based method is used.

Scope 3, Category 9: Downstream transportation

- Calculated primarily using the distance-based method by entering data on tonne-km transported. Where pre-calculated emission data is available from transport suppliers, this data is used. For a small number of cases where pre-calculated emission data or the distance-based method is not possible, the spend-based method is used.

Scope 3, Category 11: Use of sold products

- Use-phase emissions were estimated using a simplified model based on the electricity required for product dosing in a representative customer application. The assessment indicated emissions of less than 10 tonnes CO₂e annually for the volume of product sold in 2025. Owing to the limited energy requirement and resulting emissions, this category was considered immaterial.

Scope 3 categories excluded

The following Scope 3 categories have been excluded from the 2025 reporting and disclosure, with justifications provided for each exclusion:

► **Scope 3, Category 7: Employee commuting**

Justification: Based on a preliminary assessment, emissions associated with employee commuting are expected to be insignificant relative to the Group’s material emission sources. As no systematic data collection processes are currently in place and the category is not expected to materially affect the Group’s overall greenhouse gas footprint, it has been excluded from the inventory. The relevance of this category will be reassessed as data maturity improves.

► **Scope 3, Category 8: Upstream leased assets**

Justification: Emissions associated with upstream leased assets are considered immaterial based on the limited extent of such arrangements within the Group. Consequently, this category has been excluded from the inventory.

► **Scope 3, Category 10: Processing of sold products**

Justification: The reporting is limited to the delivery point. The typical processing of the chemicals requires limited downstream processing by customers. An assessment based on representative application scenarios indicated that the associated energy use and resulting greenhouse gas emissions represent less than a tenth of a per mille (<0.1 ‰) of the Group’s total GHG emissions, and was therefore excluded from reporting.

► **Scope 3, Category 12: End-of-life treatment of sold products**

Justification: The Group’s products consist primarily of chemicals used as process inputs in water treatment applications and are generally consumed during use rather than generating significant product-related waste streams requiring end-of-life treatment. Scope 3 Category 12 (End of life treatment of sold products) is expected to have limited relevance. Due to the nature of the products, the complexity and diversity of downstream applications, The Group has prioritised categories with higher expected impact. The relevance of this category will be reassessed as Scope 3 screening and data maturity evolves.

► **Scope 3, Category 13: Downstream leased assets**

Justification: Emissions associated with downstream leased assets are considered immaterial due to the negligible extent of such activities within The Group. Accordingly, this category has been excluded from the inventory.

► **Scope 3, Category 14: Franchises**

Justification: The Feralco Group has no franchises.

► **Scope 3, Category 15: Investments**

Justification: The Feralco Group does not make investments in other organisations.

INCREASING THE
AVAILABILITY OF
SUPPLIER-SPECIFIC
(PRIMARY) DATA
REMAINS A PRIORITY

E2 POLLUTION

IMPACTS, RISKS AND OPPORTUNITIES

ESRS 2 SBM-3, E2-6

Pollution is material to Feralco because the production, handling and transportation of chemicals can lead to negative impacts on air, water, soil and living organisms across the value chain. The assessment identifies material impacts related to leakages, spills and emissions, especially downstream where chemicals are used in water treatment or transported. These effects can harm ecosystems and local communities and therefore require transparent reporting. Pollution is also financially relevant: stricter regulations, liabilities for environmental damage and cleanup, and reputational risks can increase costs or reduce revenues. At the same time, The Feralco Group can contribute positively through solutions that support pollution reduction for sewage water where e.g. phosphorous is removed. These combined environmental and financial considerations make pollution a material ESRS topic for the company.

IMPACTS, RISKS AND OPPORTUNITIES RELATED TO POLLUTION (E2)

This section summarises The Feralco Group's material impacts, risks and opportunities related to pollution across its value chain. Pollution is material because the Group produces, handles and transports chemical products, which generate environmental exposure in both upstream and downstream activities.

Overview of material impacts

The Feralco Group's activities can give rise to negative impacts on water, air, soil and living organisms. The main actual and potential impacts arise from:

- ▶ **Leakages or accidental releases during production, storage or internal handling.**
- ▶ **Spills or emissions that may occur during distribution or customer use.**
- ▶ **Downstream application of water treatment chemicals that, if improperly managed by external operators, may affect aquatic environments.**
- ▶ **Local ecosystem disturbance in proximity to production sites.**
These impacts can affect biodiversity, surface water and groundwater quality, and the health and well-being of local communities. They therefore require structured management and transparent reporting.

Overview of material risks

The assessment identified several pollution-related risks with relevance for financial and operational performance. These include:

- ▶ **Regulatory tightening, where stricter discharge limits, hazardous substance restrictions or permitting requirements could increase compliance costs or require capital investments.**
- ▶ **Liability and remediation risk, where spills, leakages or other incidents may lead to clean-up obligations or compensation claims.**
- ▶ **Business interruption risk, as pollution incidents can lead to temporary suspension of operations or restrictions imposed by authorities.**
- ▶ **Reputational risk, particularly in the case of visible environmental events or negative stakeholder perception.**
These risks may influence both short-term operating costs and longer term investment needs. While the magnitude depends on the specific incident or regulatory development, pollution remains a financially relevant topic for the Group.

Overview of opportunities

The assessment also identified opportunities for The Feralco Group to contribute positively to pollution prevention in the wider value chain. These include:

- ▶ **Provision of products that support improved water quality, such as coagulants that enable more effective removal of pollutants and microplastics in wastewater treatment.**
- ▶ **Potential growing demand for solutions that assist municipalities and industries in meeting stricter water discharge limits.**
- ▶ **Increased customer interest in suppliers that demonstrate responsible environmental management.**
These opportunities may support sustained demand for The Feralco Group's products and enhance long-term competitiveness.

Policies for managing impacts, risks and opportunities related to pollution

This section summarises how existing Group policies address pollution-related IRGs. Detailed policy descriptions are presented in other chapters; this section provides a high-level explanation tailored to the pollution topic. The following policies apply:

- ▶ **Feralco Group Sustainability Strategy**
- ▶ **Feralco Group Code of Conduct**
These policies are described under the general governance section (Strategy, business model and value chain, and Sustainability governance).
- Further policies are maintained at local level and adapted to applicable local regulatory requirements.

Scope and key contents

The policies aim to ensure full compliance with applicable legislation and permit conditions and to reduce or eliminate negative impacts on human health, the environment and property. They set expectations for the responsible management of pollution-related risks across production, handling, transport and value chain interactions.

Prevention, control and mitigation of pollution

The policy framework addresses the management of pollution to air, water and soil. It includes commitments to minimise emissions of organic and inorganic substances, conduct continuous monitoring of environmental performance, and implement measures in line with legal requirements and permit conditions. The Group works to minimise contamination, support responsible water management and apply sustainability criteria in supplier assessment. Sites use recognised standards such as ISO 14001 and IPPC requirements for operational control.

Substitution and minimisation of substances of concern

The policies state that substances of high concern are not used. Where technical or regulatory constraints apply to other hazardous substances, the Group implements measures to minimise associated risks, particularly avoiding non-essential or consumer-facing applications.

Management of substances of very high concern

The Feralco Group ensures that substances of very high concern are not used. Rather than operating a phased elimination programme, the Group avoids their use altogether. The REACH Candidate List is monitored on an ongoing basis, and potential substitution alternatives would be assessed should a listed substance become relevant.

Prevention of incidents and emergency situations

The policies address prevention of pollution incidents through compliance with laws and permits, structured environmental risk assessments and regular training. If an incident occurs, procedures are designed to minimise impacts on people and the environment through rapid response and mitigation actions.

Actions

E2-2, MDR-A

During the reporting year, The Feralco Group continued to implement and monitor pollution-related actions across its entities, focusing mainly on improved containment, lower emissions and waste minimisation. Completed measures included impermeable paving and HCl gas detection at Feralco in Italy; a sealed big-bag filling system at Feralco in Spain to reduce dust emissions; and the installation of a scrubber system on the ferric plant in the UK, together with several dust extraction systems. Ongoing initiatives include sludge-to-product reuse at Feralco in Spain, hazardous-waste reduction at Feralco in Sweden and packaging-waste reduction at Gesitma in Spain.

Further pollution-prevention measures are planned, including reactor exhaust scrubbing at Feralco in Germany, HCl vapour-return systems in the Netherlands, upgraded containment and retention infrastructure at Feralco in Sweden, reinforced ground protection at Feralco in Germany and Gesitma in Spain, and the replacement of acetylene-based ICP laboratory equipment at Eco 92 in Italy. These actions are expected to strengthen air-emission control, soil and groundwater protection and the reduction of hazardous substances across the Group.

While outcomes are still being evaluated and calculation methods are not yet fully harmonised, the actions indicate a clear direction towards lower pollution risks. Measures implemented to date have already improved air-emission control, reduced dust exposure and strengthened soil and groundwater protection at operational sites. The actions primarily relate to the operational scope of each entity, with completion timelines ranging from 2025 to 2027 depending on the measure and location.

Performance

Targets related to pollution

The Group's targets for pollution are framed around full compliance with all applicable laws, regulations and permit conditions. The intent is to prevent and control pollution across the operational footprint by ensuring adherence to defined limits for emissions to air, water and soil, and by managing the use of substances of concern and substances of very high concern. The targets therefore function as minimum performance expectations rather than quantified improvement goals.

The commitment applies to four key areas:

- ▶ **Air pollutants and their specific load limits.**
- ▶ **Emissions to water within permitted discharge limits.**
- ▶ **Prevention of soil pollution and adherence to associated load thresholds.**
- ▶ **Avoidance and active management of substances of concern and substances of very high concern.**
This compliance focus supports the broader aim of mitigating pollution-related impacts, risks and opportunities identified in the materiality assessment.

Target design and measurement approach

The Group's pollution-related objectives focus on maintaining compliance with applicable legal, regulatory and permit requirements while minimising pollution risks through active chemical management and operational controls. The Group's approach includes:

- ▶ **Monitoring compliance with environmental permits and regulatory requirements.**
- ▶ **Maintaining chemical inventories and reviewing substances of concern.**
- ▶ **Preventing spills and releases through inspections, maintenance and safe handling procedures.**
- ▶ **Investigating incidents and near misses and implementing corrective actions where required.**
- ▶ **Providing relevant employee training on chemical handling, spill response and environmental requirements.**
- ▶ **Controls on the use of hazardous substances in product formulations and supply chain processes.**
Performance is monitored through environmental monitoring programmes, regulatory reporting, permit compliance reviews, incident management processes and internal environmental management practices.

Current status

At present, the Group has not established Group-wide quantitative pollution reduction targets linked to specific baselines, milestones or target years. Pollution-related performance is therefore primarily assessed through compliance, prevention and risk management measures rather than predefined reduction trajectories. The Group may consider the development of additional quantitative indicators and targets as its sustainability management processes continue to evolve.



E4 BIODIVERSITY AND ECOSYSTEMS

IMPACTS, RISKS AND OPPORTUNITIES

SBM-3, E4.SBM-3, E4-6

Biodiversity is material to The Feralco Group because its operations and supply chain interact closely with ecosystems through sourcing, chemical production, transport and the use of products in water bodies. The DMA identifies both negative impacts – such as pollution of ecosystems and drivers of biodiversity loss – as well as positive contributions through lake restoration and water treatment services. These impacts occur upstream, downstream and in The Feralco Group's own operations. There are also financially material risks if environmental degradation leads to regulatory requirements, liability for ecosystem damage or reputational effects. Conversely, increasing demand for restoration services and water treatment solutions presents opportunities for the business. Given this dual impact and the strong regulatory focus on biodiversity, this topic is material for reporting.

TRANSITION PLAN

E4-1

At present, biodiversity-related actions are integrated into the Group's broader sustainability activities rather than managed through a standalone transition plan. The Feralco Group supports ecosystem protection by enabling effective wastewater treatment and improved water quality, while also contributing to ecosystem restoration initiatives through its subsidiary Vattenresurs. As the Group continues to develop its sustainability framework, biodiversity-related objectives and actions may be further formalised where appropriate.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

Policies

E4-2, MDR-P

Biodiversity and ecosystem considerations are incorporated into the Group's environmental management practices and sustainability strategy. The Group manages biodiversity-related impacts, dependencies and risks through compliance with applicable legislation and permit requirements, supported by site-level environmental management systems, including ISO 14001-aligned frameworks where applicable.

The Group further supports ecosystem protection and restoration through activities that contribute to improved water quality and through restoration initiatives undertaken by its subsidiary Vattenresurs.

At present, biodiversity-related matters are governed through these existing management processes and sustainability commitments. The need for a dedicated Group-wide biodiversity policy will be evaluated as the Group's sustainability framework continues to evolve.

Actions

E4-3, MDR-A

With the intent to support a consistent, Group-wide basis for identifying locations that require closer review, an in-depth assessment was conducted with external expert support. The Group identified that a number of sites may be located in or near biodiversity-sensitive areas. As the ESRS framework does not provide a single prescriptive definition of "near" biodiversity-sensitive areas, the assessment was performed using a consistent screening approach across all Feralco locations.

Where sites are considered to be in proximity to biodiversity sensitive areas, the primary protective and mitigation measures are established and enforced through applicable legal requirements and permit conditions, and compliance with these requirements is embedded in local management systems. Based on the assessment performed, no additional site specific mitigation measures were identified as necessary beyond existing legal and permitting obligations at this stage.

The Group will continue to consider biodiversity and proximity to biodiversity-sensitive areas in its ongoing sustainability work and will reassess potential actions as data quality improves and operational conditions change.

In addition, The Feralco Group has adopted limited, site-specific actions related to biodiversity and ecosystems. No completed or ongoing biodiversity actions were recorded during the reporting year; however, several actions are planned in France and Germany.

Planned actions include a nature-based full-site remediation including landscaping and tree-planting programme at Feralco site in Basse Indre in France, targeted for completion by December 2027. The initiative aims to restore on-site habitats and deliver local adaptation co-benefits, such as microclimate regulation and improved water management, in the former industrial area where Feralco resides. These actions relate to The Feralco Group's own operations, primarily address local ecosystem impacts and stakeholder engagement and are not expected to contribute materially to climate mitigation outcomes. The Feralco Nordic subsidiary Vattenresurs restores ecosystems in nutrient-rich lakes and coastal bays using a proprietary treatment method in which coagulants precipitate phosphorus, helping the ecosystem return to a more balanced state. This supports improved water quality and delivers biodiversity benefits.

The expected outcomes include improved habitat quality and strengthened local ecosystem services at and around operational sites. While outcomes have not yet been quantified, the actions are anticipated to support local biodiversity, including pollinators and other beneficial species, and to contribute positively to long-term nature protection at a local level.

The actions apply at site or regional level and are limited in scope. Implementation does not require significant operational or capital expenditures. The Group does not use biodiversity offsets, nor has it incorporated local or indigenous knowledge into the listed actions.

Targets

E4-4, MDR-T

The Group is currently evaluating the necessity and feasibility of developing biodiversity metrics at the consolidated level. As a result, no Group-wide targets have been established at this stage. Within

certain business segments, primarily Vattenresurs, biodiversity-related impacts are already monitored through established operational indicators. These include the number of lakes treated, the total treated area and the tonnes of phosphorus captured. These indicators provide a practical means of quantifying the segment's contribution to changes in water quality and related ecological conditions.

Metrics

E4-5, MDR-M

Impact metrics related to biodiversity and ecosystems change

Monitoring of biodiversity- and ecosystem-related impacts is based on metrics established by competent authorities in the countries where The Feralco Group operates. These metrics are applied and complied with at local entity level in accordance with national regulatory requirements. Due to differences in regulatory frameworks, definitions and monitoring approaches across jurisdictions, biodiversity-related metrics are currently not consolidated or reported at Group level.

Positive biodiversity- and ecosystem-related impacts generated by The Feralco Group subsidiary Vattenresurs are measured using quantifiable outcome-based metrics. These include the amount of phosphorus removed from the ecosystems of the treated water bodies. Metrics include number of water bodies, the surface area of lakes and other water bodies restored. The amount of phosphorus precipitated is measured, but this provides only an indicative view of the treatment's impact. The most significant effect is the qualitative, long-term improvement in ecological status. In many cases, the ecosystem begins to improve almost immediately, with biodiversity gradually starting to recover. These developments are monitored and supported by follow-up research conducted with academic partners.

Biodiversity and ecosystem impact metrics	2025	2024	2023
Treated surface (hectares)	770	584	442
Number of lakes (number)	6	6	3
Estimated amount of phosphorous precipitated from the ecosystem (tonnes)	35.0	18.5	24.5

Figure 8. Biodiversity and ecosystem impact metrics, 2023–2025

Certain potential impacts on biodiversity and ecosystems are monitored and reported under Pollution (ESRS E2), where they are more appropriately captured due to their nature and measurement approach, rather than under ESRS E4.

In addition, a screening assessment of sites owned, leased or managed within the reporting boundary was conducted in 2024 using geospatial biodiversity risk datasets. The screening did not confirm any material overlap between Group sites and protected areas or Key Biodiversity Areas at the level of specificity required for disclosure. Further analysis, such as site-level verification and/or the use of IBAT, would be required to determine whether any sites intersect with, or are in proximity to, specific designated areas. On this basis, no biodiversity-sensitive land area in material proximity to The Feralco Group's sites is reported at this stage.



E5 RESOURCE USE AND CIRCULAR ECONOMY

IMPACTS, RISKS AND OPPORTUNITIES

ESRS 2 SBM-3

Circular economy is material because The Feralco Group’s operations rely on resource-intensive raw materials and generate residual streams across the value chain. Material impacts arise primarily from upstream sourcing of key inputs and from waste and sludge associated with manufacturing and downstream use of the Group’s products. Financially material risks relate to supply disruptions for critical inputs and higher procurement costs driven by regulatory change and market constraints. The assessment also identifies opportunities to improve circularity and resilience through recovery of valuable components from sludge, increased use of recycled or secondary materials, and improved operational resource efficiency – measures that can lower costs and strengthen competitiveness. These impacts, risks and opportunities confirm circularity as a relevant topic for ESRS disclosures.

Circular economy in various shapes is material to The Feralco Group, and significant efforts are being undertaken to transform the traditional coagulant business by adopting circular economy concepts. Customers expect consistent performance, quality and regulatory compliance, and circularity is therefore pursued without compromising quality or operational performance. Several commercial initiatives have already been adopted, while others remain under development. These include the use of alternative raw materials, partnerships in circular development projects, acquisitions of recycling businesses and the establishment of complementary operations.

The drivers are diverse, encompassing economic factors, supply resilience, access to raw materials and the enhancement of value from existing product lines. Circularity also supports decarbonisation by lifting material streams higher up the waste hierarchy where technically feasible and commercially viable. Some of the Group’s most developed Circular Economy models are found within its recycling-focused businesses. Subsidiaries Eco 92 (Italy) and Gesitma (Spain) upgrade selected industrial residue streams into coagulants used in wastewater treatment. In Vetlanda (Sweden), the production of polyaluminium chloride has utilised secondary streams from the aluminium industry as a raw material since 1982, including for coagulants used in drinking water treatment. In parallel, efforts are made to reduce internal waste generation through site-level projects that improve yield, process stability and the handling of production residuals.

Progress is influenced by factors such as raw material availability, consistency and cost. These trade-offs and the resulting pace of implementation are recognised and communicated transparently. This is especially relevant in specification-driven applications, including drinking water coagulants, where active content and strict impurity control are critical to product performance and regulatory acceptance. The European chemical industry is, in many areas, highly integrated and provides key inputs such as acids and metal salts through integrated value chains. These structures can include co-products and by-products that are efficiently utilised, delivering advantages in scale, cost and quality. At the same time the optimisation of existing value chains can limit the speed at which raw material flows can be reconfigured, potentially slowing the implementation of the new circular solutions. Within these constraints, the Group seeks to expand circular alternatives where technically and commercially viable pathways exist.

Continuous efforts are also directed towards improving transport efficiency, including through load optimisation and return freight solutions in close cooperation with transport companies. Smarter process performance at customer sites contributes to resource efficiency. The Group’s polymer business plays an important role in this regard. By improving separation and sludge dewatering, polymers can help reduce overall chemical consumption and extend the value of our coagulants. Downstream opportunities related to metal recycling and phosphorus recovery continue to be assessed. Recycling metals back to standard coagulants is still challenging from a commercial perspective, while phosphorus recovery is supported by a stronger resource value proposition, including the EU’s classification of phosphate rock and phosphorus as Critical Raw Materials. Developments in this area are monitored closely, and participation in projects and partnerships is pursued where roles, responsibilities and implementation pathways are sufficiently defined and demonstrate clear potential.

IMPACTS, RISKS AND OPPORTUNITY MANAGEMENT

Policies

E5-1, MDR-P

Feralco has not yet adopted a dedicated Group-wide policy specifically addressing resource use and circular economy; the sustainability policy framework remains under development. Nevertheless,

circularity is already integrated into the business through established operational practices, the use of secondary materials, and oversight through the dedicated Circularity Manager role. These elements guide ongoing work even though they are not yet consolidated into a single policy document.

In the absence of a standalone policy, the Group’s Sustainability Strategy provides the overarching direction for circular economy. It sets out the intention to reduce reliance on virgin materials while lowering environmental footprints and strengthening societal resilience, and it sets expectations to increase the share of recycled inputs, collaborate with customers to design recyclable chemical solutions, engage with stakeholders on circular material flows, and monitor emerging circular technologies for future raw material or product opportunities.

Actions

E5-2, MDR-A

During the reporting year, Feralco implemented and progressed a set of circular economy actions aimed at improving material efficiency, reducing waste and strengthening water reuse. The actions focus on practical, site level measures such as material recovery, water substitution, process loss reduction and packaging reuse, implemented across the Feralco organisations in Spain (incl. Gesitma), France, Germany, and the UK – primarily within The Feralco Group’s own operations, with selected measures extending into downstream activities.

Key completed and ongoing actions include: rainwater to process water reuse at Feralco in France (approximately 1800 m³/year); recycling of water treatment sludge into new coagulants through the REAL 2.0 project at Feralco in Spain; recovery of spilt aluminium sulphate for reuse at Feralco in the UK; and expanded packaging circularity in collaboration with Gesitma in Spain through reconditioned returnable containers and reuse of sample bottles. Eco 92 in Italy completed an EU waste shipment notification to facilitate recovery (R4) over disposal. In addition, Feralco in France plans to incorporate unreacted magnetite into production to reduce virgin raw material consumption, and Feralco in Germany is developing cleaning and rinse water recycling processes to reduce water consumption and inbound freight.

The expected outcomes of these actions are reduced reliance on virgin raw materials, lower waste volumes and improved water and resource efficiency across the Group. At this stage, several outcomes have not yet been fully quantified; however, the actions are designed to contribute to improved circularity and reduced environmental footprints as projects mature.

Implementation timelines vary by entity and measure. Rainwater reuse at Feralco in France and the EU waste shipment notification at Eco 92 were completed in 2025. Magnetite reuse at Feralco in France is planned by December 2026, and water recycling projects in Germany are expected to be finalised by August 2027. Several actions at Feralco in Spain, the UK and for Gesitma are ongoing without fixed end-dates, reflecting continuous circular practices rather than one-off projects.

Implementation of these actions does not require significant operational or capital expenditure.

PERFORMANCE

Targets

E5-3, MDR-T

Through circular economy concepts The Feralco Group seeks to reduce the use of virgin materials by keeping resources in productive use through reuse, recycling and recovery. Virgin materials are derived from newly extracted resources, secondary raw materials are recovered from waste through recycling, and by-products are co-produced materials from other manufacturing processes that can be used as alternative inputs. The use of secondary raw materials and by-products supports circularity by reducing waste generation and dependence on virgin resource extraction. This can also be a decarbonisation lever.

The Group has established a set of circularity related targets to guide the progressive integration of circular economy principles into its operations. These targets are designed to support a gradual shift away from virgin raw materials, strengthen resource efficiency and contribute to supply resilience across the value chain.

At this stage, the target framework consists of a combination of qualitative objectives and quantitative indicators. The approach reflects the current level of data maturity and the technical and commercial constraints associated with chemical production, including material specifications, impurity thresholds and customer requirements.

Circularity initiatives depend on collaboration across upstream suppliers, downstream custom-



ers and relevant external stakeholders, including research institutions and partners involved in recycling and recovery technologies. In particular, the integration of recycled and by-product materials requires close coordination with customers to ensure that product performance, safety and regulatory compliance meet requirements for building the circular economy.

The Group’s circularity targets focus primarily on increasing the share of recycled and by-product raw materials used in production. In addition, selected targets support the development of circular product applications and project-based initiatives. The following key performance indicators have been established:

- **Assessment of the share and volume of recycled and by-product raw materials replacing virgin inputs. Target year: 2026.**
- **Increase the share of recycled raw materials relative to total raw material sourcing. A quantitative target will be established as data availability improves and technical feasibility is further assessed. Expected during 2027. Indicative timeline: 2030.**
- **Increase in the combined share of recycled and by-product raw materials, subject to reassessment based on operational feasibility and value chain constraints. Indicative timeline: 2030.**
- **Run of three parallel circular projects within the Group. Target year: 2025.**

As of the reporting period, the assessment of recycled and by-product material shares and the implementation of three circular project lines have been achieved and are partially reflected in this sustainability statement. The target to increase recycled material sourcing must be regarded as challenging under current technical and market conditions. The target related to combined recycled and by-product materials has been achieved for certain product segments (coagulants), but not yet across the Group’s total raw material base.

The targets will be further refined as data quality improves, internal processes are harmonised and practical experience with circular material flows increases. At this stage, progress is monitored through internal data collection and project tracking rather than a fully standardised Group-wide performance system.

METRICS

Resource inflows

E5-4, E5-5, MDR-M

The Group sources material inputs through established procurement processes designed to support product quality, supply reliability and compliance with relevant requirements. New suppliers are reviewed prior to onboarding, with consideration given to operational capability, delivery performance, quality standards and relevant sustainability aspects.

Supplier relationships are primarily managed through long-term cooperation, contractual arrangements and ongoing follow-up. Expectations related to responsible business conduct are communicated through the Business Code of Conduct. Supplier audits or additional assessments may be conducted where considered appropriate; however, practices vary across The Group and continue to develop.

The Group predominantly sources from established suppliers, many of which have supplied the business for several years. This provides practical insight into supplier performance, while also indicating that certain documented assessments and audit evidence may require updating as sustainability reporting requirements become more detailed.

Procurement activities are supported by controls covering purchasing, quality verification, supplier management and contract compliance. These processes help ensure reliable sourcing of materials and contribute to the management of sustainability-related risks within the supply chain.

Relevant Resources Sourced

- **Raw materials:** including aluminium salts (Al), iron oxides (Fe), hydrochloric acid, sulphuric acid, chlorate, hydrogen peroxide, additives, and other chemicals essential for operations.
- **Utilities:** energy, natural gas, oil, and water used in processing and manufacturing.
- **Physical assets:** offices, buildings, plants (21 industrial sites), vehicles, and land.
- **Other inputs:** specialised knowledge, patents, and know-how relevant to chemical production.

Supplier Base Overview

The Group sources raw materials, transport services and utilities from a diverse supplier base. Certain critical raw materials are procured from a limited number of qualified suppliers due to technical, quality and regulatory requirements. Supplier concentration and supply continuity are monitored as part of procurement and risk management processes.

ESG Impacts Identified in Supplier Activities

- **Virgin raw materials** such as aluminium and iron compounds are extracted from mines, leading to significant environmental footprints (e.g., approximately 36 tonnes of material excavated per tonne of aluminium and 16 tonnes per tonne of iron).
- **Fossil fuel usage in transportation and steam generation** contributes to emissions; efforts are ongoing to increase the use of secondary raw materials and alternative fuels such as Hydrotreated Vegetable Oil (HVO). Some transportation also use rail and maritime transport to reduce carbon footprint.
- **Exploring secondary and by-product sources for acids** is underway to improve circularity, though strict purity and heavy metal content regulations pose challenges.
- **Wastewater and hazardous waste handling by chemical suppliers** are monitored to mitigate environmental risks.

The Feralco Group continuously monitors and reassesses supplier-related impacts through sustainability due diligence and materiality assessments to support responsible sourcing and reduce negative ESG outcomes.

Resource inflows	2025
Total weight of products and materials	623 000
Biological raw materials sustainably sourced	0 %
Total weight of circular raw materials (by-products and secondary)	318 023
Circular raw materials in ratio to all raw material for coagulants manufacturing	71%
Total weight of secondary materials	11 400
Secondary materials in relation to total products and materials	1.8%

Figure 9. Resource inflows (excluding water), 2025



Resource outflows

Feralco specializes in the production of water treatment chemicals using a combination of virgin and circular raw materials, which include by-products and waste materials. All inputs meet strict performance and purity standards, ensuring safety and cost-efficiency. Additionally, Feralco operates a waste management business, further supporting circular economy principles in its production processes.

Product durability

The Feralco Group's products exhibit durability consistent with the industry average. As chemical substances, they undergo reactions and integration during use, ensuring their effectiveness and suitability for their intended applications. By nature, the products are not repairable.

Waste generated in The Feralco Group's own operations

Waste metrics include waste generated from the Group's operations and managed through the Group's waste management systems. (Waste generated and managed independently by external contractors is generally excluded due to local regulatory differences, unless responsibility for its management rests with the Group.)

Waste metrics	2025
Total amount of waste generated [tonnes]	2 800
Total Amount of Waste Diverted from Disposal [tonnes]	1 200
- Preparation for reuse [tonnes]	0.2
- Recycling [tonnes]	1 100
- Other recovery [tonnes]	150
Hazardous waste [tonnes]	1 100
Non-hazardous waste [tonnes]	120

Total Amount of Waste Directed to Disposal [tonnes]	1 600
- Incineration [tonnes]	130
- Landfill [tonnes]	780
- Other disposal [tonnes]	660
Hazardous waste [tonnes]	1 300
Non-hazardous waste [tonnes]	260
Percentage of recycled waste %	44 %

Figure 10. Waste metrics, 2025

Composition of waste

The Feralco Group's relevant waste streams are dominated by by-product and residues typically collected in drums or Intermediate Bulk Containers (IBCs).

Consistent additional streams are liquid effluents and off-spec/residual coagulants; occasional non-routine volumes arise from incidents and construction works. Packaging-related wastes include contaminated plastic packaging/containers. Other streams comprise alumina waste, absorbent filter media, laboratory chemicals and insulating materials; ordinary office/workshop wastes (paper, plastics, wood) are handled via municipal routes, and toner/cartridges go to authorised operators.

Pickling acids are managed via recovery and physico-chemical treatment, waste mixtures that Eco 92 cannot treat to End-of-Waste are sent for disposal, while Gesitma acts as a licensed intermediary for customer take-back/transport/treatment when applicable.

No production waste is generated at non-manufacturing sites.



Materials in waste

Under ESRS E5 5 (Resource outflows – waste), The Feralco Group's waste consists primarily of inorganic acids, coagulant residues and filter cakes from product manufacturing. These may be acidic, containing metal hydroxy-oxides often not washed and therefore being hazardous waste.

Additional streams include ferrous/ferric raw material residues (also with gravel), alumina waste, contaminated absorbents and wipes, oily separator sludges, laboratory and organic chemical residues, contaminated HDPE/PP packaging, and common recyclables/combustibles (paper/cardboard, plastics, wood, mixed waste).

In some cases, no waste was reported as generated during the reporting period. This reflects waste being temporarily accumulated on site rather than transferred to an external waste management provider.

Hazardous waste generated in the Feralco Group's own operations

Hazardous waste	2025
Total Amount of Hazardous Waste [tonnes]	2 400
Total Amount of Radioactive Waste [tonnes]	0

Figure 11. Hazardous waste, 2025

Product waste management and product end-of-life

Operationally, the Group works to reduce waste at source through production adjustments, such as recipe optimisation, and by recovering product waste where feasible. The Group also collaborates with specialised service providers and licensed waste-management partners to ensure that waste arising from its operations is handled, transported and treated in a responsible manner. Where technically feasible, the Group also operates returnable plastic-container loops involving collection, preparation and reuse or refill, which keeps certain types of packaging in circulation for longer and reduces the need for single-use alternatives.

The Feralco Group considers environmental impacts across the entire product life cycle, including end-of-life aspects. The Group's products are predominantly supplied as liquid treatment chemicals in bulk and are consumed or transformed during drinking water, wastewater and industrial treatment processes. As a result, the products generally do not remain as standalone materials requiring disposal at the end of their use and therefore do not typically generate significant product-related end-of-life waste.

While products rarely become waste as such, situations may occur where limited volumes remain unused. In most cases, however, the products are consumed through chemical reactions during treatment processes and become incorporated into treatment residues, commonly referred to as sludge, together with the impurities they are used to remove.

These sludges can have various downstream applications. In particular, wastewater-treatment sludges may contain valuable resources, such as phosphorus and biomass, which can be recovered or utilised in processes including nutrient recovery and energy generation. Consequently, The Feralco Group's products generally do not contribute significantly to end-of-life waste.

However, product composition and performance remain important in supporting the safe and efficient management, treatment and potential recovery of resulting sludge streams. By enabling effective treatment processes and supporting downstream recovery opportunities where feasible, the Group contributes to resource efficiency and circularity beyond the point of product use.

In certain markets, Group companies provide specialised waste-management services that support customers in managing waste streams and meeting regulatory requirements. Gesitma in Spain operates as a licensed intermediary and waste broker, organising take-back, transport and treatment on behalf of customers and invoicing the associated service. Eco 92 in Italy performs similar brokerage activities for several waste types when appropriate.

For the portion of products supplied in packed format (bags, big-bags or IBCs), The Group supports the collection, transportation and treatment of relevant waste streams. These activities contribute to improved resource recovery and circularity, enabling materials and valuable components to be reused, recycled or otherwise managed in accordance with applicable regulatory and environmental requirements. In certain applications, this may also support the recovery of valuable resources, contributing to more efficient use of materials and the broader transition towards a circular economy.

Due to the nature of the Group's products, direct end-of-life considerations are largely confined to the management of a limited amount of product packaging and associated materials, which are generally managed by customers in accordance with applicable waste-management requirements.

The Group seeks to minimise environmental impacts associated with post-use packaging through regulatory compliance, recycling initiatives and, where technically feasible, reuse systems that keep packaging materials in circulation for longer. Customers receive Safety Data Sheets and relevant handling and disposal information to support safe and compliant management of packaging and any associated residues in accordance with local regulatory requirements. This is consistent with the Group's existing approach of providing customers with safety data sheets and disposal guidance to support compliant downstream handling.

The Group continues to evaluate opportunities to improve packaging circularity, increase reuse where practical and promote responsible end-of-life management throughout the value chain. These efforts reflect The Feralco Group's objective of minimising environmental impacts associated with product distribution and packaging while supporting efficient and compliant downstream handling practices.

ACCOUNTING PRINCIPLES

E5-2 – Actions and resources related to resource use

and circular economy

Resource inflow data is based on internal records, procurement data and operational inputs from relevant sites and is subject to internal review processes, although no external validation has been performed.

E5-3 Targets related to resource use and circular economy

No additional methodological information is reported for this disclosure. The accounting principles therefore include only the contextual elements presented elsewhere in the chapter.

E5-4 Resource inflows

Resource inflow metrics cover purchased material inputs measured in tonnes and exclude water. The proportion of recycled input materials is estimated using data gathered through the annual internal survey. The reported data has been reviewed to avoid double counting between reused and recycled material categories. The methodology relies on procurement records and internally reported information. Reporting is limited to material categories for which sufficiently reliable data is available.

E5-5 Resource outflows

Resource-outflow and waste-related metrics are primarily based on contractor weighbridge measurements supported by consignment or transfer documentation and by treatment-site annual returns. For operations managed by third parties, their annual reporting serves as the key data source. Hazardous waste is tracked from generation to final treatment and documented using European Waste Catalogue (EWC/CER) codes in accordance with regulatory requirements.

The methodology assumes that contractor-documented weights reflect the most accurate quantification available. Allocation keys are used when waste streams are shared between entities. Office-only locations with no production are assessed as having no reportable waste volumes. Regulatory storage and dispatch requirements are followed, including permitted temporary-storage timeframes and the requirement to use authorised operators. Completeness is supported by invoices and by prudent estimates where needed.

Resource-outflow data is based primarily on internal records.

(In Italy, waste-related data is subject to external verification, and Eco 92 submits monthly data to the Italian Environmental Agency, as the operation is linked to End-of-Waste activities. No fully equivalent external validation process exists in other jurisdictions where we operate, but waste volumes are reported.)

SOCIAL INFORMATION

S1 OWN WORKFORCE

S1 OWN WORKFORCE

Impacts, risks and opportunities

SBM-3, S1.SBM-3

The own workforce topic is material especially because The Feralco Group’s operations depend on employees working in environments that involve handling chemicals and operating heavy equipment. These working conditions create inherent health and safety exposures that require systematic management. In addition to physical safety, the Group has a material responsibility to protect employee well-being, including psychosocial risks, as part of maintaining a safe and productive workplace.

The Feralco Group’s workforce is central to business continuity and operational resilience. The skills, experience and day-to-day decisions of employees are necessary to operate production facilities reliably and to meet customer and regulatory expectations. Maintaining safe working conditions, supporting employee well-being and applying fair employment practices are therefore integral to operational performance and to the company’s ability to recruit, retain and protect its workforce.

The Double Materiality Assessment identifies material impacts related to employee health and safety and employee well-being. It also highlights opportunities linked to improved working conditions and stronger well-being practices. Reducing incident risks, supporting physical and mental health, and strengthening workplace routines and culture can contribute to lower turnover and more stable long-term operations. These considerations confirm ESRS S1 as material for reporting. Impact, risk and opportunity management

POLICIES

S1-1, MDR-P

The Feralco Group’s management of impacts, risks and opportunities related to its own workforce is guided by a set of Group-wide policies that collectively define expectations for ethical conduct, equal treatment, and workplace safety. These policies apply to all employees across the Group and form the basis for how The Group safeguards human rights, supports fair working conditions and maintains a healthy and safe working environment.

The Personnel Policy establishes equal opportunities, ethical behaviour and compliance with applicable rules, and sets clear expectations for creating a safe, non-discriminatory and supportive workplace. The Code of Conduct reinforces these principles by prohibiting child labour, forced or coerced labour, trafficking and discriminatory practices, and by affirming respect for internationally recognised human and labour rights, including freedom of association and collective bargaining. The Occupational Safety and Health Policy outlines the Group’s commitments to workplace safety and well-being, including the Zero Harm vision and systematic risk mitigation across operations.

Together, these policies require that all employees are treated fairly and respectfully, and that ethical behaviour is upheld throughout the organisation. They are supported by procedural elements such as a confidential whistleblower channel, anti-retaliation protections, behavioural expectations for reporting misconduct, and regular employee surveys that help identify emerging issues related to inclusion, culture and working conditions. These mechanisms help prevent, detect and address discrimination or other adverse impacts, ensuring that The Feralco Group’s workforce-related responsibilities are operationalised in practice.

PROCESS FOR ENGAGEMENT AND REMEDIATION

S1-2, S1-3, S1-4

Process for engagement with own workforce

The Feralco Group engages with its workforce through decentralised processes that reflect national legislation and local labour-market practices. Each entity maintains regular dialogue with employees using mechanisms such as appraisal discussions, personal target-setting, union interactions where applicable, and employee surveys. These channels support the identification of actual and potential impacts on employees and form part of the Group’s due-diligence approach.

Engagement focuses on topics identified in the Double Materiality Assessment, including well-being, equal opportunities and other equality-related matters. A Group-level employee survey was put in place in 2025, with results analysed at Group as well as local level to ensure relevant follow-up.

Operational responsibility for ensuring that engagement is carried out and that outcomes inform The Feralco Group’s approach lies with the Chief Executive Officer, supported by local management teams.

Process for remediation of own workforce

The Feralco Group’s approach to remedying human-rights impacts in its own workforce is guided by Group-wide policy commitments to internationally recognised human and labour rights. These commitments are set out in the Code of Conduct and the Personnel Policy.

Together, these policies establish the principles that would guide remediation if a human-rights impact were to occur. They include respect for internationally proclaimed human rights, non-discrimination and equal treatment, the prohibition of child labour and forced or coerced labour, freedom of association and collective bargaining, and the provision of safe and healthy working conditions. The policies also require ethical behaviour, compliance with applicable laws and continuous improvement of workplace conditions.

Feralco enables remedy by maintaining confidential and retaliation-free reporting channels, including an externally administered whistleblower system and the option to report concerns to managers, the CEOs or Board members. These channels allow employees to raise concerns anonymously and ensure that credible issues can be investigated and addressed. The Feralco Group’s commitments provide the basis for actions such as corrective measures, workplace adjustments, or other responses appropriate to the nature of the impact.

TARGETS

S1-5, MDR-T

The Feralco Group has established Group-level workforce objectives introduced as part of the transition from decentralised management of social matters to a more harmonised sustainability governance model. These targets, introduced in 2025, reflect the Group’s ambition to support a safe, fair and inclusive working environment across all entities. The current Group-level targets are:

- Zero workplace incidents annually.
- 100% of employees trained each year in ESG-related topics.
- Continuous assurance of equal opportunities for all employees.
- At least 30% women in leadership roles by 2035, with a long-term ambition of achieving gender balance over time.

The Group is currently developing a more consistent approach to monitoring workforce-related objectives across legal entities. As reporting processes and governance structures continue to develop, the associated metrics, responsibilities and monitoring arrangements are to be further refined.

Workforce-related objectives have been developed through Group and local management processes. The Group recognises the importance of employee perspectives and may further strengthen stakeholder involvement as workforce governance processes continue to evolve and become more harmonised across the organisation.

METRICS

S1-6, S1-7, S1-8, S1-9, S1-10, S1-11, S1-12, S1-13, S1-14, S1-15, S1-16, S1-17, MDR-M

Characteristics of own employees

The gender distribution of The Feralco Group’s full time equivalent employees (FTEs) during 2025 (average throughout the year).

	Gender	Head count	Share
	Male	242	76 %
	Female	77	24 %
	Total	319	100 %

Figure 12. Employee and Gender distribution, 2025

Employee turnover data is not yet reported on a consolidated Group basis. The development of more harmonised workforce reporting processes is expected to improve the availability and consistency of such information over time.

Collective bargaining and social dialogue

Across The Feralco Group, there are local collective bargaining agreements. Based on the available workforce data, 65 per cent of employees are covered by collective bargaining agreements. At Group level, 39 per cent of employees are represented by workers’ representatives.

DIVERSITY METRICS

Distribution of The Feralco Group’s employees by age

Age breakdown	Number of employees	Percentage of employees
Employees under 30 years old	23	7 %
Employees 30-50 years old	145	45 %
Employees over 50 years old	151	47 %

Figure 13. Age distribution of employees, 2025

Distribution of The Feralco Group’s top management by gender

Gender in leadership roles	2025
Number of women in top management	1
Number of men in top management	11
Percentage of women in top management	8 %
Percentage of men in top management	92 %

(Top management is defined to be: CEOs, C-suites and MDs).

Figure 14.Top management distribution by gender, 2025

Adequate wages and social protection

Employees receive an adequate wage in line with the applicable benchmarks used for this disclosure. The same assessment has been extended voluntarily to non-employees in the Group’s own workforce, and all non-employees are also reported as receiving wages aligned with the applicable adequacy benchmarks.

Coverage by social protection is universal across The Feralco Group. Coverage for non-employees has not been reported.

Training and skills development metrics

Group-wide training and skills development metrics are currently being harmonised. Initial focus has been placed on establishing consistent reporting of training participation and completion rates across the Group. Managers are responsible for conducting training and this is an inherent element of performance reviews to investigate the need for people’s development.

Employees	2025
Total share of employees who received a structured annual performance review.	51 %
Percentage of women who received a structured annual performance review	60 %
Percentage of men who received a structured annual performance review	48 %

Figure 15. Employees’ training metrics, 2025

Annual performance reviews are currently not mandatory or structured in all Feralco countries/units.

Health and safety metrics

Health and safety metrics	2025
Percentage of own workforce who are covered by the company’s health and safety management system based on legal requirements and/or recognised standards or guidelines	100 %
Percentage of own workforce who are covered by a health and safety management system which is based on legal requirements and/or recognised standards or guidelines, and which has been internally audited and/or audited or certified by an external party	0 %
Fatalities as a result of work-related injuries [Fatalities of accidents]	0
Fatalities as a result of work-related ill health [Fatalities of accidents]	0
Recordable work-related accidents [Number of accidents]	9
Rate of recordable work-related accidents, TRR [Number of accidents per million hours worked]	17.6
Lost Time Injuries Rate, LTIR [Number of Lost Time Injuries per million hours worked]	3.9
Cases of recordable work-related ill health	0
Days lost to work-related injuries and fatalities from work-related accidents and work-related ill health and fatalities from ill health [days]	10

Figure 16. Health and safety metrics, 2025

Health and safety management system

The Feralco Group manages occupational health and safety through a group-wide health and safety management framework comprising common policies, minimum requirements, governance and reporting processes, supplemented by local systems at entity level. The framework applies to all employees and is implemented in accordance with applicable national legislation and local risk profiles. The scope and level of formalisation are adapted to the size, complexity and risk exposure of each organisational unit.

Work-related ill health includes acute, recurring, and chronic conditions caused or aggravated by work, such as musculoskeletal disorders, skin and respiratory diseases, cancers, diseases related to physical agents, and work-related mental health conditions.

Work-life balance metrics

Work-life balance metrics cover employees’ entitlement to family-related leave, including maternity, paternity, parental and carers’ leave, as defined under national legislation and collective agreements in line with ESRS S1-15 AR 96.

Work-life balance 2025	Percentage of employees
Employees entitled to take family-related leave	100 %
Employees who took family-related leave	25 %
Women who took family-related leave	40 %
Men who took family-related leave	20 %

Figure 17. Work-life balance metrics, 2025

S2 WORKERS IN THE VALUE CHAIN

Incidents, complaints and severe human rights impacts

The Feralco Group uses a workplace engagement survey tool to monitor employee well-being and engagement, which can indicate potential experiences of bullying, discrimination or other work related concerns. Where survey results suggest possible bullying or related issues, management follows up to better understand the situation and take appropriate action. However, the survey tool does not register or track individual incidents, and no bullying-related complaints or incidents were reported through other available channels, including grievance mechanisms, during the reporting period. Accordingly, the total number of severe human rights incidents related to the company's workforce was zero for the reporting period.

ACCOUNTING PRINCIPLES

The S1 disclosures are based on data drawn from the Group's different internal HR, payroll and employee-management systems, with the methodologies and assumptions for each metric described in the relevant subsections. There is no standalone financial statement prepared at The Feralco Group level, as all financial information is consolidated within the annual report of Mellby Gård, which also contains the most representative employee figures. The average number of employees for 2025 follows the financial reporting methodology.



IMPACTS, RISKS AND OPPORTUNITIES

SBM-3, S2.SBM-3

Workers in The Feralco Group's value chain may be exposed to risks linked to limited transparency and differing labour standards among upstream suppliers and downstream partners, particularly in regions outside Europe. Material impacts relate to working conditions, including health and safety risks associated with the handling of chemicals and other process inputs. These conditions can vary across suppliers, which increases the need for appropriate due diligence and monitoring.

Poor labour practices among suppliers or downstream partners can also lead to operational, financial and reputational consequences for The Feralco Group. As The Group depends on stable and responsible value-chain relationships to operate reliably, safeguarding the conditions under which external workers are employed contributes to business resilience.

Due to these potential impacts and risks across both upstream and downstream stages, the topic S2 is considered material for reporting.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

Policies

S2-1, MDR-P

The Feralco Group currently addresses workers in the value chain through the Business Code of Conduct, which sets expectations regarding legal compliance, health and safety standards, and responsible business practices. The need for a dedicated policy will be considered as sustainability governance and due diligence processes continue to develop.

PROCESS FOR ENGAGEMENT AND REMEDIATION

The Group's approach to workers in the value chain is currently centred on supplier due diligence, assessments, audits and the communication of expectations through relevant policies and supplier requirements. These mechanisms support the identification and management of potential value-chain impacts. As the Group further develops its sustainability governance and due diligence framework, additional approaches to stakeholder engagement may be considered where relevant.

A potential material negative impact has been identified relating to the handling of hazardous materials in upstream and downstream activities. To address this risk, the Group communicates expectations regarding occupational health and safety, legal compliance and responsible business conduct through its Business Code of Conduct and supplier-related processes. Supplier assessments, audits and ongoing due diligence activities support the identification and management of potential value-chain impacts.

The Group's whistleblower channel is available to both internal and external stakeholders and provides a confidential mechanism for raising concerns. Whistleblower reports are managed confidentially according to the Group's Whistleblower Policy, with formal acknowledgement and structured follow-up procedures. As the Group continues to develop its sustainability governance and due diligence framework, opportunities to further strengthen engagement and grievance management processes relating to value-chain workers will be evaluated.

Actions

S2-4, S2-5, MDR-A, MDR-T

The Group's current focus is on strengthening supplier due diligence processes, relevant policies and reporting capabilities relating to workers in the value chain. These activities support the identification, assessment and management of potential value-chain impacts and provide the foundation for the future development of more specific actions, objectives and monitoring processes.

S3 AFFECTED COMMUNITIES

IMPACTS, RISKS AND OPPORTUNITIES

SBM-3, S3.SBM-3

Affected communities are material because The Feralco Group's products support essential water treatment processes that influence water quality and sanitation services. These services have direct implications for communities' social and economic rights, particularly where access to clean and safe water depends on effective downstream treatment. The DMA identifies positive impacts linked to improved water quality, which can support public health and community well-being.

Communities may also face risks if products are not used as intended or where information provided to operators is incomplete. Such situations could affect service reliability or the quality of treated water delivered to end users. These potential outcomes underscore the importance of clear information, responsible product use and appropriate support to downstream partners.

Given the combination of positive impacts and potential risks associated with water treatment across the downstream value chain, S3 is considered material for reporting.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

Policies

S3-1, MDR-P

Community-related matters are currently addressed through the Group's broader sustainability governance framework, including due diligence procedures, supplier assessments, internal training and sustainability monitoring processes. These mechanisms support the identification and assessment of impacts, risks and opportunities relating to affected communities.

The double materiality assessment identified a positive material impact through the Group's contribution to water treatment and related societal benefits. As sustainability governance continues to mature, the Group will evaluate whether additional community-specific policies or management processes are required.

PROCESS FOR ENGAGEMENT AND REMEDIATION

S3-2, S3-3, S3-4

No material negative impacts on affected communities have been identified. Community-related concerns can be raised through The Feralco Group's publicly available whistleblowing channel, which is open to any external stakeholder and handled confidentially in line with internal procedures. Relevant concerns are reviewed and addressed through established governance and follow-up processes. The Group will continue to evaluate whether additional engagement or grievance mechanisms relating specifically to affected communities are appropriate as its sustainability framework develops.

Actions

S3-4, MDR-A

No instances of non-respect for internationally recognised rights of affected communities have been identified within The Feralco Group's operations or value chain. Given the nature of the impacts identified through the double materiality assessment, community-related matters are currently addressed through broader sustainability governance and due diligence processes rather than through dedicated Group-wide action programmes. Local entities may maintain relationships and interactions with communities relevant to their operations, while efforts to strengthen consistency and coordination across the Group continue as sustainability governance develops.

Targets

S3-5, MDR-T

The double materiality assessment identified a material positive impact on affected communities, mainly through the Group's contribution to water treatment and related societal benefits. The Group has set a target to carry out 10 community projects annually across the Group. As sustainability governance and reporting processes develop, the Group will continue to assess whether further community-related objectives and performance indicators should be introduced.

Metrics

MDR-M

The Group's material positive impact on affected communities is primarily linked to its contribution to drinking water and wastewater treatment. To support the monitoring of this impact, the Group has



developed a set of positive impact metrics intended to provide an indication of the societal benefits enabled through its products and technologies. These metrics are based on estimates and should be interpreted as indicative measures of impact rather than direct measurements of outcomes.

Positive impact metric	2025
Water treatment reach.....	Approximately 10 billion m ³ of water and wastewater treated
People reached through water services.....	Approximately 150 million people supported by drinking water and/or wastewater treatment services
Number of customers (municipalities, utilities or industries served).....	Feralco supplied products for use in water treatment to approximately 1 200 customers across approximately 2 300 delivery locations.

Figure 18. Positive water impact metrics, 2025

The reported metrics are derived from sales volumes and product portfolio data collected from The Group entities. Entity-level calculations are performed using documented application-specific conversion factors that estimate the volume of water and wastewater treatment enabled by the Group's products and the associated potential population impact. The calculation methodology takes into account product application characteristics and available operational information. Population impact is an indicative estimate and should not be interpreted as the number of unique individuals served, as populations may be represented through multiple treatment processes and applications. The resulting estimates are consolidated at The Group level and are subject to internal review, validation and management approval processes before reporting.

As the methodology relies partly on proxy factors and assumptions, the reported figures should be regarded as indicative estimates. The Group intends to further develop metrics that help assess the societal benefits associated with its contribution to drinking water and wastewater treatment.

GOVERNANCE INFORMATION G1 BUSINESS CONDUCT

IMPACTS, RISKS AND OPPORTUNITIES

ESRS 2 SBM-3

Business conduct is considered a material topic for The Feralco Group, as ethical behaviour, anti-corruption measures and transparent decision-making are fundamental to maintaining trust among employees, customers, suppliers and regulators. The Double Materiality Assessment identifies material impacts related to corporate culture, including the need to promote fair and transparent business practices and to ensure that concerns can be raised safely, including through whistleblower protection mechanisms.

The Group's approach to governance and business conduct is grounded not only in the management of legal and reputational risks, but also in a commitment to responsible conduct as an expression of the values that guide its operations. Unethical behaviour or corruption may result in financial losses, regulatory sanctions and reputational damage. Such risks can arise across the value chain and have the potential to undermine stakeholder confidence in the Group's activities and relationships.

Given the influence of business conduct on stakeholder trust, regulatory expectations and the stability of value-chain relationships, G1 Business conduct is considered material for ESRS reporting.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

Policies

G1-1, MDR-P

The Feralco Group manages its material impacts, risks and opportunities related to business conduct through a set of Group-wide policies that define expectations for ethical behaviour, responsible decision-making and regulatory compliance. These policies, presented in the general governance section of the sustainability statement, apply across all entities and form the foundation for how the Group addresses corruption and bribery risks, manages supplier relationships and protects individuals who report concerns. Local policies may exist in certain entities, but they do not override the Group-level framework.

The material business-conduct topics for the Group are corruption and bribery, the management of supplier relationships (including payment practices) and the protection of whistleblowers. These topics reflect the areas where ethical conduct and transparent processes are most relevant to the Group's operations and value chain.

The Feralco Group has established mechanisms to identify, report and investigate unlawful behaviour or breaches of the Code of Conduct. These mechanisms include a formal Whistleblower Policy, complementing normal management oversight and supported by targeted training. Reports can be submitted confidentially by employees or other stakeholders, and all credible concerns are investigated in a timely and structured manner to ensure integrity in decision-making and compliance with legal and internal requirements.

The Group's approach to business ethics, integrity and responsible conduct is currently governed through the Code of Conduct and the Business Partner Code of Conduct. These documents set expectations for ethical business practices and compliance with applicable laws and regulations. As sustainability and compliance governance continue to develop, the Group may further evaluate the need for additional policies or enhanced alignment with internationally recognised frameworks.

Whistleblower protection is covered by the existing Whistleblower Policy, which enables secure and confidential reporting and prohibits retaliation. Procedures are in place to ensure that business-conduct incidents, including suspected corruption or bribery, are investigated promptly, independently and objectively. Employees are expected to identify and report concerns as part of their responsibilities, with further escalation through the line organisation. The whistleblower channel provides an additional channel for reporting concerns where standard reporting routes may be insufficient.

Training on business conduct is provided at onboarding through a review of relevant policies. Line managers are expected to revisit the Code of Conduct annually with their teams. Training completion is currently managed at local entity level. As governance and reporting processes continue to develop, the Group aims to strengthen the consistency of training monitoring across the organisation. The functions most exposed to corruption and bribery risk are those with commercial re-

sponsibilities, including sales, procurement and leadership roles where external interaction, negotiation and contracting are frequent. These functions are therefore particularly important for ongoing awareness and adherence to the Group's ethical expectations.

APPROACH TO BUSINESS CONDUCT

G1-1, G1-2, G1-3, G1-5, MDR-A

Approach to protection of whistleblowers

The Feralco Group maintains a formal whistleblower function that allows employees and other stakeholders to report serious irregularities in a confidential and secure manner. Any individual submitting a report through the channels set out in the Whistleblower Policy is protected from reprisals, provided the report is made in good faith and based on reasonable grounds. This protection extends not only to the whistleblower but also to colleagues, trade union representatives, health and safety officers and others who assist them, as well as temporary staff or consultants working within the Group.

Protection under the policy ensures that no adverse consequences may be directed at the whistleblower or related parties as a result of having raised a concern. If an individual believes they have experienced retaliation following a whistleblower report, they are instructed to contact the Group's CEOs immediately. While the policy safeguards whistleblowers, it does not prevent the Group from taking action against an individual for reasons unrelated to the whistleblower report.

Through these measures, the Group aims to create a working environment where concerns can be raised safely, enabling the early identification and correction of business-conduct issues. The whistleblower mechanism complements the broader governance framework and supports the Group's commitment to transparent and responsible business conduct.

Approach to political engagement and lobbying

The Feralco Group does not engage in political participation or lobbying activities. The Group reports that it made no financial or in-kind political contributions during the reporting period, and it does not undertake direct lobbying, political advocacy or attempts to influence public policy. Political engagement is therefore not a material area of activity for the company, and the scope of this disclosure is limited to clarifying the company's approach and the boundaries of its external interactions.

Employees may participate in industry associations as part of their professional responsibilities, most notably INCOPA (the European Inorganic Coagulants Producers' Association, branch under CEFIC). The Feralco Group's participation in these forums is limited to technical and sector-related collaboration.

The Group's external engagement is otherwise confined to commercial and marketing-related activities, including trade fairs, seminars, webinars and customer visits. These activities are designed to support business operations and customer relationships and do not involve political influence. At this stage, the Group has not identified material impacts, risks or opportunities related to political engagement or lobbying.

Approach to relationship with suppliers and payment practices

The Feralco Group's approach to managing its relationships with suppliers is guided by The Feralco Group Business Code of Conduct and, where relevant, the Corporate Social Responsibility Policy. These documents set expectations for responsible sourcing, transparent commercial behaviour and fair treatment of suppliers, including payment practices and the consideration of social and environmental criteria.

Payment practices

The Group has a policy to prevent late payments, including to small and medium-sized suppliers. Payment processes follow the standard rules and contractual terms applicable in each market, and the Group undertakes to meet its obligations and address deviations in a timely manner. To support timely processing, all supplier invoices are scanned and handled through the Group's ERP system, reducing the risk of delays and enabling consistent follow-up. This approach is intended to ensure predictable cash flow for suppliers and support stable long-term relationships.

Supplier relationships

The Feralco Group's approach to supplier engagement is formalised in the Business Code of Conduct, which emphasises responsible business practices, risk management and sustainability across the supply chain. Procurement and supply-chain employees receive continuous training to support effective engagement with suppliers and to strengthen understanding of how sustainability factors are integrated into sourcing decisions. The Group prioritises suppliers that demonstrate strong environmental and social performance, hold relevant certifications or operate locally, where this supports resilience and operational continuity.

Procurement incentives are designed to support responsible sourcing and to reinforce the importance of sustainability considerations alongside cost, quality and delivery performance. While the Feralco Group has no specific programmes in place, we are committed to maintain ethical and inclusive practices within our procurement activities.

Supplier management is supported by ongoing assessments, including visits, audits and surveys, which provide insight into supplier performance and alignment with the Group's expectations. The Group is developing further targets and initiatives to strengthen communication and consistency in supplier engagement as part of its broader sustainability work.

Social and environmental criteria in supplier selection

Social and environmental considerations form part of supplier selection and evaluation. The Business Code of Conduct and the Corporate Social Responsibility Policy outline the expectations placed on suppliers, including adherence to legal requirements, responsible environmental management and respect for human rights and labour standards. These criteria are applied when assessing new suppliers and reviewing existing ones, supporting The Feralco Group's aim to foster more sustainable and resilient value-chain partnerships.

Approach to corruption and bribery

The Feralco Group applies a zero-tolerance approach to corruption and bribery, as set out in the Group's Codes of Conduct. All employees and associated persons are required to read, understand and acknowledge these policies as part of onboarding. The obligation to prevent, detect and report suspected incidents applies to everyone, and concerns may be reported confidentially through the whistleblower channel. Reports submitted through this channel are managed by an independent external provider, and an independent committee is established when a case requires investigation. Confirmed breaches may lead to disciplinary action in line with local procedures.

The Group does not yet have a formalised Group-level process for reporting corruption-related outcomes to administrative or supervisory bodies. Historically, such matters have been handled at entity level, and further development of structured reporting processes may be considered as governance maturity increases. Corruption-related matters are currently managed at entity level. The Group continues to strengthen the consistency of governance and reporting practices across its operations, including processes for escalating and reporting material matters where appropriate.

Corruption and bribery policies are communicated through the Code of Conduct and the Business Code of Conduct, which are part of the employee handbook and introduced at onboarding. Line managers are responsible for ensuring continued awareness. Training covers all employees, and during the reporting period 21 of 73 employees in functions at higher risk (29 per cent) received specific training.

PERFORMANCE

Targets

MDR-T

The Group has not set specific targets under ESRS G1. During the reporting period, the Group reported no confirmed incidents of corruption or bribery. There were no convictions, fines, disciplinary actions or contract terminations, and no actions were required. The Group's current focus is on maintaining a strong business conduct culture through policies, training, awareness and reporting mechanisms.

METRICS

G1-3, G1-4, G1-5, G1-6, MDR-M

The Feralco Group uses third-party tools to increase transparency and demonstrate that key management systems are working in practice. At Group and entity levels, this currently includes an EcoVadis assessment, which is used to evidence compliance expectations and continuous improvement. The assessment provides an external evaluation of environmental, labour and human rights, ethics and sustainable procurement practices and supports the Group's continuous improvement efforts.

ACCOUNTING PRINCIPLES

G1 disclosures are prepared using internal compliance, HR and finance records covering the Group's own operations. No incidents of corruption or bribery were reported during the period, and data is internally validated. Information on political influence, lobbying and payment practices is based on internal assessments, with no external validation applied.



APPENDIX 1:
STATEMENT ON
DUE DILIGENCE

ESRS 2 GOV-4

This table identifies where the core elements of due diligence are reflected in the voluntary sustainability statement. The references do not indicate full compliance with every Disclosure Requirement cited.

CORE ELEMENT OF DUE DILIGENCE	REFERENCES IN THE SUSTAINABILITY STATEMENT
a) Embedding due diligence in governance, strategy and the business model	ESRS 2 SBM-1, pp. 60–62 ESRS 2 GOV-1 and GOV-2, pp. 61–63 ESRS 2 GOV-3, p. 62 MDR-P, pp. 62–63 G1-1, pp. 86–87
b) Engaging with affected stakeholders in all key steps of due diligence	ESRS 2 SBM-2, p. 63 S1-2 and S1-3, pp. 82–84 S2 engagement and remediation processes, p. 84 S3-2 and S3-3, pp. 84–85 G1-1, pp. 86–87
c) Identifying and assessing actual and potential adverse impacts	ESRS 2 IRO-1 and IRO-2, pp. 63–65 E1 SBM-3, pp. 66–67 E2 SBM-3, p. 74 E4 SBM-3, p. 76 E5 SBM-3, p. 78 S1 SBM-3, p. 82 S2 SBM-3, p. 84 S3 SBM-3, pp. 84–85 G1 SBM-3, p. 86
d) Taking action to address actual and potential adverse impacts	E1-3, p. 67 E2-2, pp. 74–75 E4-3, pp. 76–77 E5-2, p. 78 S1-4, pp. 82–84 S2-4, p. 84 S3-4, p. 85 G1-1 and G1-3, pp. 86–87
e) Tracking the effectiveness of due-diligence efforts and communicating performance	E1-4 to E1-6, pp. 67–73 E2-3, pp. 74–75 E4-4 and E4-5, pp. 76–77 E5-3 to E5-5, pp. 78–81 S1-5, S1-6, S1-8 to S1-11, S1-13 to S1-15 and S1-17, pp. 82–84 S2-4 and S2-5, p. 84 S3-5 and related metrics, p. 85 G1 performance and metrics, pp. 86–87

APPENDIX 2:
DISCLOSURE
REQUIREMENTS
ADDRESSED IN THE
VOLUNTARY
SUSTAINABILITY
STATEMENT

ESRS 2 IRO-2

This appendix identifies the ESRS Disclosure Requirements addressed in the voluntary sustainability statement and their reporting treatment. It does not constitute a statement of full ESRS compliance.

DISCLOSURE REQUIREMENT	REPORTING TREATMENT	PAGE REFERENCE	SCOPE AND REPORTING LIMITATIONS
ESRS 2 General disclosures BP-1 General basis for preparation BP-2 Disclosures in relation to specific circumstances GOV-1 Role of administrative, management and supervisory bodies GOV-2 Information provided to and sustainability matters addressed by governing bodies	Reported Reported Reported Partially reported	p. 60 p. 65 pp. 61–62 pp. 61–63	– – – Oversight and monitoring are described, but a detailed list of matters addressed and reporting frequency is limited.
GOV-3 Integration of sustainability-related performance in incentive schemes GOV-4 Statement on due diligence GOV-5 Risk management and internal controls over sustainability reporting SBM-1 Strategy, business model and value chain SBM-2 Interests and views of stakeholders	Reported Reported Reported Reported Partially reported	pp. 88–89 pp. 62–63 pp. 60–62 p. 63	– – – Stakeholder groups and DMA interviews are described, but engagement outcomes and effects on strategy are limited.
SBM-3 Material impacts, risks and opportunities IRO-1 Process to identify and assess material IROs IRO-2 Disclosure Requirements covered	Reported Reported Reported through Appendix 2	pp. 63–65 and topical sections pp. 63–65 Appendix 2	– – This index identifies disclosure location and treatment.
E1 Climate change ESRS 2 GOV-3-E1 Climate-related performance in incentive schemes E1-1 Transition plan for climate change mitigation	Reported Partially reported	p. 62 p. 66	– No detailed transition plan, financial plan, investment roadmap or Paris-aligned pathway has been adopted.
ESRS 2 SBM-3-E1 Material climate-related impacts, risks and opportunities ESRS 2 IRO-1-E1 Climate-related materiality assessment E1-2 Climate policies E1-3 Climate actions and resources E1-4 Climate targets	Reported Reported Reported Reported Partially reported	pp. 66–67 pp. 63–65 p. 67 p. 67 pp. 67–69	– – – – The 2035 pathway is indicative, targets are not science-based and the architecture remains under development.
E1-5 Energy consumption and mix E1-6 Gross Scope 1, Scope 2, Scope 3 and total GHG emissions E1-7 GHG removals and carbon credits	Reported Reported Not reported	p. 69 pp. 69–73 –	– – Possible future use of carbon offsetting is discussed on pp. 67–68, but no GHG removals or carbon credits are reported for 2025.
E1-8 Internal carbon pricing	Not reported	–	Assessment of a possible internal carbon price is mentioned on p. 66, but no applied internal carbon-pricing scheme is disclosed for 2025.
E1-9 Anticipated financial effects	Partially reported	pp. 66–67	Risks and opportunities are described qualitatively; required monetary amounts and detailed asset exposure are not disclosed.
E2 Pollution ESRS 2 SBM-3-E2 Material pollution impacts, risks and opportunities ESRS 2 IRO-1-E2 Pollution materiality assessment E2-1 Pollution policies E2-2 Pollution actions and resources E2-3 Pollution targets	Reported Reported Reported Reported Partially reported	p. 74 pp. 63–65 pp. 74–75 pp. 74–75 pp. 74–75	– – – – Compliance objectives are stated, but Group-wide quantitative reduction targets are absent.
E2-4 Pollution of air, water and soil	Not reported	–	Pollution-related impacts, policies and controls are described on pp. 74–75. The Group does not disclose Group-level quantities of relevant pollutants emitted to air, water and soil.

DISCLOSURE REQUIREMENT	REPORTING TREATMENT	PAGE REFERENCE	SCOPE AND REPORTING LIMITATIONS
E2-5 Substances of concern and substances of very high concern	Partially reported	pp. 74–75	Management approach and stated avoidance of SVHC are disclosed, but required quantitative information is absent.
E2-6 Anticipated financial effects	Partially reported	p. 74	Financial risks and opportunities are described qualitatively, without monetary effects.
E3 Water and marine resources			
ESRS 2 SBM-3-E3 and IRO-1-E3 materiality conclusion	Topic assessed as not material	pp. 64–65	–
E3-1 Water and marine-resource policies	Topic assessed as not material	–	Water-related IROs did not reach the materiality thresholds.
E3-2 Water and marine-resource actions	Topic assessed as not material	–	No E3 topical disclosure is reported.
E3-3 Water and marine-resource targets	Topic assessed as not material	–	No E3 topical disclosure is reported.
E3-4 Water consumption	Topic assessed as not material	–	No E3 topical disclosure is reported.
E3-5 Anticipated financial effects	Topic assessed as not material	–	No E3 topical metric is reported in the sustainability statement.
E4 Biodiversity and ecosystems			
E4-1 Transition plan and consideration in strategy and business model	Partially reported	p. 76	No standalone biodiversity transition plan has been adopted.
ESRS 2 SBM-3-E4 Material biodiversity impacts, risks and opportunities	Reported	p. 76	–
ESRS 2 IRO-1-E4 Biodiversity materiality assessment	Reported	pp. 63–65	–
E4-2 Biodiversity policies	Partially reported	p. 76	Existing management systems and strategy apply; no dedicated Group-wide biodiversity policy exists.
E4-3 Biodiversity actions and resources	Reported	pp. 76–77	–
E4-4 Biodiversity targets	Partially reported	p. 77	No Group-wide biodiversity targets have been established.
E4-5 Biodiversity impact metrics	Partially reported	p. 77	Vattenresurs metrics are reported, but Group-wide biodiversity metrics are not consolidated.
E4-6 Anticipated financial effects	Partially reported	p. 76	Financial risks and opportunities are qualitative; monetary effects are absent.
E5 Resource use and circular economy			
ESRS 2 SBM-3-E5 Material resource-use impacts, risks and opportunities	Reported	p. 78	–
ESRS 2 IRO-1-E5 Resource-use materiality assessment	Reported	pp. 63–65	–
E5-1 Circular-economy policies	Partially reported	p. 78	No dedicated Group-wide policy exists; the sustainability strategy provides direction.
E5-2 Circular-economy actions and resources	Reported	p. 78	–
E5-3 Circular-economy targets	Partially reported	pp. 78–79	Quantitative and qualitative indicators are presented, but monitoring is not fully standardised.
E5-4 Resource inflows	Reported	p. 79	–
E5-5 Resource outflows	Reported	pp. 80–81	–
E5-6 Anticipated financial effects	Partially reported	p. 78	Risks and opportunities are qualitative; monetary effects are absent.
S1 Own workforce			
ESRS 2 SBM-2-S1 Workforce interests and views	Partially reported	pp. 63 and 82	Survey, appraisal and union mechanisms are described, but effects on strategy are limited.
ESRS 2 SBM-3-S1 Material workforce impacts, risks and opportunities	Reported	p. 82	–
S1-1 Workforce policies	Reported	p. 82	–
S1-2 Workforce engagement	Reported	p. 82	–
S1-3 Remediation and channels	Reported	pp. 82–84	–
S1-4 Actions relating to own workforce	Partially reported	pp. 82–84	Actions are described, but effectiveness is not comprehensively quantified.
S1-5 Workforce targets	Reported	pp. 82–83	–
S1-6 Characteristics of employees	Reported	pp. 82–83	–
S1-7 Characteristics of non-employees	Not reported	–	No number or characteristics of non-employees are disclosed.
S1-8 Collective bargaining and social dialogue	Reported	p. 83	–
S1-9 Diversity metrics	Reported	p. 83	–
S1-10 Adequate wages	Reported	p. 83	–
S1-11 Social protection	Partially reported	p. 83	Employee coverage is reported; non-employee coverage is not reported.
S1-12 Persons with disabilities	Not reported	–	No metric is disclosed.
S1-13 Training and skills development	Partially reported	p. 83	Performance-review coverage is reported, but complete training metrics are absent.
S1-14 Health and safety	Reported	p. 83	–
S1-15 Work-life balance	Reported	p. 83	–
S1-16 Remuneration metrics	Not reported	–	Neither the unadjusted gender pay gap nor the highest-paid-person-to-medi-an remuneration ratio is disclosed.
S1-17 Incidents, complaints and severe human-rights impacts	Reported with limitation	p. 84	No incidents or severe impacts were reported through available channels; the survey does not track individual incidents.
S2 Workers in the value chain			
ESRS 2 SBM-2-S2 Interests and views of value-chain workers	Partially reported	pp. 63 and 84	Supplier engagement is described, but direct worker engagement is not established.
ESRS 2 SBM-3-S2 Material impacts, risks and opportunities	Reported	p. 84	–
S2-1 Policies	Partially reported	p. 84	The Business Code of Conduct applies; a dedicated policy has not been adopted.

DISCLOSURE REQUIREMENT	REPORTING TREATMENT	PAGE REFERENCE	SCOPE AND REPORTING LIMITATIONS
S2-2 Engagement with value-chain workers	Partially reported	p. 84	Supplier processes are described, but systematic direct engagement is not reported.
S2-3 Remediation and channels	Partially reported	p. 84	The external whistleblowing channel is available; worker-specific grievance arrangements are not reported.
S2-4 Actions relating to value-chain workers	Partially reported	p. 84	Supplier due diligence is being strengthened, but specific outcomes and effectiveness are limited.
S2-5 Targets	Partially reported	p. 84	Future development of objectives is described, but a complete measurable target framework is not reported.
S3 Affected communities			
ESRS 2 SBM-2-S3 Community interests and views	Partially reported	pp. 63 and 84–85	General stakeholder engagement and local interaction are described; systematic community engagement is limited.
ESRS 2 SBM-3-S3 Material impacts, risks and opportunities	Reported	pp. 84–85	–
S3-1 Policies	Partially reported	p. 85	Broader governance processes apply; no dedicated community policy is reported.
S3-2 Community engagement	Partially reported	pp. 84–85	Local interaction exists, but there is no Group-wide systematic engagement process.
S3-3 Remediation and channels	Partially reported	pp. 84–85	The public whistleblowing channel is available; a community-specific mechanism is not reported.
S3-4 Actions	Partially reported	p. 85	Broader governance and local relationships are described rather than a dedicated Group-wide action programme.
S3-5 Targets	Reported	p. 85	–
Entity-specific positive-impact metrics	Reported with estimation uncertainty	p. 85	Water volume, people supported and customer reach are estimated using sales and application factors.
S4 Consumers and end-users			
ESRS 2 SBM-3-S4 and IRO-1-S4 materiality conclusion	Topic assessed as not material	pp. 64–65	Potential safety impacts were assessed as low in severity and likelihood.
S4-1 Policies	Topic assessed as not material	–	–
S4-2 Engagement	Topic assessed as not material	–	–
S4-3 Remediation and channels	Topic assessed as not material	–	–
S4-4 Actions	Topic assessed as not material	–	–
S4-5 Targets	Topic assessed as not material	–	–
G1 Business conduct			
ESRS 2 SBM-3-G1 Material business-conduct impacts, risks and opportunities	Reported	p. 86	–
ESRS 2 GOV-1-G1 Governance responsibilities	Reported	pp. 61–62	–
ESRS 2 IRO-1-G1 Business-conduct materiality assessment	Reported	pp. 63–65	–
G1-1 Policies and corporate culture	Reported	pp. 86–87	–
G1-2 Supplier relationships	Reported	pp. 86–87	–
G1-3 Prevention and detection of corruption and bribery	Partially reported	pp. 86–87	Policies, channels and training are described; centralised reporting processes remain incomplete.
G1-4 Corruption or bribery incidents	Reported	p. 87	–
G1-5 Political influence and lobbying	Reported	p. 86	–
G1-6 Payment practices	Partially reported	p. 86	Policy and invoice process are described, but standard quantitative payment metrics are absent.

The reporting treatment is based on the content presented in the voluntary sustainability statement. “Partially reported” means that relevant information is available but that the complete content prescribed by the associated ESRS Disclosure Requirement is not presented. The classification does not constitute an assurance conclusion.

APPENDIX 3: DATAPOINTS FROM OTHER EU LEGISLATION

ESRS 2 IRO-2

This table identifies where the core elements of due diligence are reflected in the voluntary sustainability statement. The references do not indicate full compliance with every Disclosure Requirement cited.

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	MATERIAL & REPORTING TREATMENT	PAGE REFERENCE
ESRS 2 GOV-1 Board gender diversity paragraph 21(d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		Material and partially reported	pp. 61–62
ESRS 2 GOV-1 Percentage of Board members who are independent paragraph 21(e)			Delegated Regulation (EU) 2020/1816, Annex II		Material and partially reported	pp. 61–62
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				Material and reported	pp. 88–89
ESRS 2 SBM-1 Involvement in activities related to fossil-fuel activities paragraph 40(d)(i)	Indicator number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Tables 1 and 2	Delegated Regulation (EU) 2020/1816, Annex II		Not applicable	–
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40(d)(ii)	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Material and reported	pp. 60–61
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40(d)(iii)	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1); Delegated Regulation (EU) 2020/1816, Annex II		Not applicable	–
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40(d)(iv)			Delegated Regulation (EU) 2020/1818, Article 12(1); Delegated Regulation (EU) 2020/1816, Annex II		Not applicable	–
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	Material and partially reported	p. 66
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16(g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1	Delegated Regulation (EU) 2020/1818, Article 12.1(d) to (g), and Article 12.2		Not reported	–
ESRS E1-4 GHG emission-reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3	Delegated Regulation (EU) 2020/1818, Article 6		Material and partially reported	pp. 67–69
ESRS E1-5 Energy consumption from fossil sources disaggregated by source paragraph 38	Indicator number 5 Table #1 and Indicator number 5 Table #2 of Annex 1				Material and reported	p. 69
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				Material and reported	p. 69
ESRS E1-5 Energy intensity associated with activities in high climate-impact sectors paragraphs 40–43	Indicator number 6 Table #1 of Annex 1				Material and not reported	–
ESRS E1-6 Gross Scope 1, Scope 2, Scope 3 and total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1	Delegated Regulation (EU) 2020/1818, Articles 5(1), 6 and 8(1)		Material and reported	pp. 69–73
ESRS E1-6 Gross GHG-emissions intensity paragraphs 53–55	Indicator number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3	Delegated Regulation (EU) 2020/1818, Article 8(1)		Material and reported	p. 69

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	MATERIAL & REPORTING TREATMENT	PAGE REFERENCE
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Material and not reported	–
ESRS E1-9 Exposure to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II; Delegated Regulation (EU) 2020/1816, Annex II		Material and partially reported	pp. 66–67
ESRS E1-9 Monetary amounts by acute and chronic physical risk paragraph 66(a)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5			Material and not reported	–
ESRS E1-9 Location of significant assets at material physical risk paragraph 66(c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5			Material and partially reported	pp. 66–67
ESRS E1-9 Carrying value of real-estate assets by energy-efficiency class paragraph 67(c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; Template 2			Material and not reported	–
ESRS E1-9 Exposure to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Material and partially reported	pp. 66–67
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil paragraph 28	Indicator number 8 Table #1; Indicators number 1, 2 and 3 Table #2 of Annex 1				Material and not reported	–
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Not material and not reported	pp. 64–65
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table #2 of Annex 1				Not material and not reported	pp. 64–65
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material and not reported	pp. 64–65
ESRS E3-4 Total water recycled and reused paragraph 28(c)	Indicator number 6.2 Table #2 of Annex 1				Not material and not reported	pp. 64–65
ESRS E3-4 Water consumption per net revenue paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not material and not reported	pp. 64–65
ESRS 2 SBM-3-E4 paragraph 16(a)(i)	Indicator number 7 Table #1 of Annex 1				Material and partially reported	pp. 64 and 76–77
ESRS 2 SBM-3-E4 paragraph 16(b)	Indicator number 10 Table #2 of Annex 1				Material and partially reported	pp. 76–77
ESRS 2 SBM-3-E4 paragraph 16(c)	Indicator number 14 Table #2 of Annex 1				Material and partially reported	pp. 76–77
ESRS E4-2 Sustainable land or agriculture practices paragraph 24(b)	Indicator number 11 Table #2 of Annex 1				Material and partially reported	p. 76
ESRS E4-2 Sustainable oceans or seas practices paragraph 24(c)	Indicator number 12 Table #2 of Annex 1				Material and partially reported	p. 76
ESRS E4-2 Policies to address deforestation paragraph 24(d)	Indicator number 15 Table #2 of Annex 1				Material and not reported	–
ESRS E5-5 Non-recycled waste paragraph 37(d)	Indicator number 13 Table #2 of Annex 1				Material and reported	p. 80
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				Material and reported	p. 80

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	MATERIAL & REPORTING TREATMENT	PAGE REFERENCE
ESRS 2 SBM-3-S1 Risk of incidents of forced labour paragraph 14(f)	Indicator number 13 Table #3 of Annex I				Material and partially reported	p. 82
ESRS 2 SBM-3-S1 Risk of incidents of child labour paragraph 14(g)	Indicator number 12 Table #3 of Annex I				Material and partially reported	p. 82
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				Material and reported	p. 82
ESRS S1-1 Due diligence policies addressing the fundamental ILO Conventions 1–8 paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		Material and partially reported	p. 82
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				Material and reported	p. 82
ESRS S1-1 Workplace-accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				Material and reported	pp. 82–83
ESRS S1-3 Grievance and complaints mechanisms paragraph 32(c)	Indicator number 5 Table #3 of Annex I				Material and reported	pp. 82–84
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88(b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Material and reported	p. 83
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88(e)	Indicator number 3 Table #3 of Annex I				Material and reported	p. 83
ESRS S1-16 Unadjusted gender pay gap paragraph 97(a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Material and not reported	–
ESRS S1-16 Highest-paid-person-to-median remuneration ratio paragraph 97(b)	Indicator number 8 Table #3 of Annex I				Material and not reported	–
ESRS S1-17 Incidents of discrimination paragraph 103(a)	Indicator number 7 Table #3 of Annex I				Material and partially reported	p. 84
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104(a)	Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12(1)		Material and partially reported	p. 84
ESRS 2 SBM-3-S2 Significant risk of child labour or forced labour in the value chain paragraph 11(b)	Indicators number 12 and 13 Table #3 of Annex I				Material and partially reported	p. 84
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Material and partially reported	p. 84
ESRS S2-1 Policies related to value-chain workers paragraph 18	Indicators number 11 and 4 Table #3 of Annex 1				Material and partially reported	p. 84
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12(1)		Material and partially reported	p. 84
ESRS S2-1 Due diligence policies addressing the fundamental ILO Conventions 1–8 paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Material and partially reported	p. 84
ESRS S2-4 Human-rights issues and incidents connected to the upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				Material and partially reported	p. 84

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	MATERIAL & REPORTING TREATMENT	PAGE REFERENCE
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Material and partially reported	p. 85
ESRS S3-1 Non-respect of UNGPs, ILO principles and OECD Guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12(1)		Material and partially reported	p. 85
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Material and partially reported	p. 85
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Not material and not reported	pp. 64–65
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12(1)		Not material and not reported	pp. 64–65
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				Not material and not reported	pp. 64–65
ESRS G1-1 United Nations Convention against Corruption paragraph 10(b)	Indicator number 15 Table #3 of Annex 1				Material and partially reported	pp. 86–87
ESRS G1-1 Protection of whistleblowers paragraph 10(d)	Indicator number 6 Table #3 of Annex 1				Material and reported	pp. 86–87
ESRS G1-4 Fines for violations of anti-corruption and anti-bribery laws paragraph 24(a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Material and reported	p. 87
ESRS G1-4 Actions addressing breaches of anti-corruption and anti-bribery standards paragraph 24(b)	Indicator number 16 Table #3 of Annex 1				Material and reported	p. 87

