“Bottling life’s best moments with the most sustainable glass”

4

SUSTAINABILITY REPORT

4.1 PART I: Our Company

4.1.1 Introduction

The following Statement of Non-Financial Information (SNFI) complies with the requirements stipulated under the Corporate Sustainability Reporting Directive (CSRD), which is designed to enhance transparency on sustainability and ensure high-quality, comparable reporting across the European Union. This report has been prepared in line with the European Sustainability Reporting Standards (ESRS). It also addresses the priority issues identified by the Vidrala Group (referred to as Vidrala, the Group, the Company, or the Organisation) in its double materiality assessment carried out in 2024.

The Vidrala Group includes its parent company, Vidrala, S.A., headquartered in Llodio (Álava), along with its subsidiaries. The information and quantitative data presented in this report cover the period from 1 January to 31 December 2024 and pertain to the entities consolidated within the Vidrala Group's financial reporting scope, adjusted as necessary for any newly consolidated entities during this period.

Galo Álvarez
Chief of Sustainability and Corporate Development

"At Vidrala, sustainability and competitiveness go hand-in-hand, forming the foundation of our vision for the future. This 2024 Sustainability Report reflects our progress, priorities, and the challenges we navigate as we work toward creating the world's most sustainable glass packaging. Through our "Glass Made Good" strategy, we are committed to integrating sustainable practices across every aspect of our business - from reducing emissions and advancing circularity to enhancing the well-being of our people and communities.

Glass stands out as the most sustainable packaging material, offering full recyclability and an infinite life cycle. As the only truly inert packaging material, it ensures no microplastics are generated or come into contact with food and beverages, preserving product integrity and safety. As global demand shifts toward healthy and environmentally responsible solutions, this year's report highlights the concrete actions we are taking to maximise our positive impact.

We pride ourselves on being the most efficient glass manufacturer in the world. Our motto, "the most sustainable kWh is the kWh that is not consumed," reflects our commitment to resource efficiency and positions us as the glass packaging manufacturer with the lowest emission factor in the industry.[1] This focus strengthens our environmental commitment, fosters Vidrala's competitiveness, and allows us to reinvest proceeds strategically, with our customers in mind.

A sustainable company is built on the strength and engagement of its people. Our commitment to People extends to creating a safe, diverse, and inclusive workplace, supported by initiatives such as our Women in Manufacturing (WIM) program, which fosters gender diversity in leadership and operational roles. As you read through the report, you will see how our actions support our long-term vision of sustainable development. Each milestone brings us closer to a more competitive and environmentally responsible Vidrala."

[1] An emission factor of 0.36 tCO_2 per tonne of melted glass has been determined through our internal calculations. A competitor analysis was performed based on CDP 2022 reports of our five main competitors in the countries where we operate.

4.1.2 Vidrala at a glance

1. Our history

Our story began in 1965 in Llodio (Álava). Since then, we have experienced robust growth, becoming a leading supplier in the manufacture of glass container products. From our humble beginnings, our mission has been clear: to produce glass containers and supply packaging services as efficiently, profitably, and sustainably as possible, while ensuring the safety and well-being of our people.

One of our most significant milestones came in 1985 when we successfully listed on the Madrid and Bilbao stock exchanges. Four years later, we expanded our capacity by commissioning the Crisnova plant in Caudete (Albacete), reaching a total annual production of 225,000 tonnes that year.

Our expansion continued with the acquisition of Ricardo Gallo in 2003, a Portuguese company with a century of experience in the glass industry. In 2005, we acquired BSN Glasspack in Castellar del Vallés (Barcelona) and Avir in Corsico (Italy), followed by the purchase of Manufacture du Verre in Belgium in 2007. These acquisitions substantially increased our annual production capacity, reaching 805,000 tonnes in the Iberia region and 950,000 tonnes for the Group as a whole.

We maintained our upward growth trend with the acquisition of Encirc (United Kingdom and Ireland) in 2015 and Santos Barosa (Portugal) in 2017. In 2023, we purchased the beverage filling facilities and logistics infrastructure in Bristol, known as "The Park," improving our services in the UK market and strengthening our position in the beverage supply chain. That same year, we also acquired Vidroporto, S.A., a Brazilian glass container manufacturer, as part of our strategy to further diversify the business.

1965
The origin of Vidrala
Vidrala begins operations in Alava (Spain).

1985
Vidrala goes public
IPO Madrid and Bilbao stock exchanges.

1989
Domestic expansion
Second greenfield in Albacete (Spain).

2003
Internationalisation
Acquisition of one plant in Portugal.

2005
Internationalisation
Acquisition of two plants: Barcelona (Spain) and Italy.

2007
Internationalisation
Acquisition of one plant in Belgium.

2015
Transformational acquisitions
Acquisition of Encirc (UK and Ireland).

2017
Transformational acquisitions
Acquisition of Santos Barosa (Portugal).

2019
Strategic divestment
Sale of our manufacturing activity in Belgium.

2023
Differentiation & Diversification
Acquisition of Vidroporto (Brazil).

2023
Differentiation & Diversification
Acquisition of 'The Park' filling & logistics business (UK).

2024
Differentiation & Diversification
Sale of our manufacturing activity in Italy.

In 2024, after a deep strategic reflection, we decided to divest from Italy by selling our Italian subsidiary, Vidrala Italia. This divestment allowed us to refocus on strategic regions and capitalise on the value created in Italy. The transaction strengthened our financial position, reducing our debt to €325 million - approximately 0.7 times the proforma EBITDA of our new perimeter. Today our journey continues as we focus, stronger than ever, on our core markets to keep delivering value to our shareholders, customers, and employees.

We have consolidated our position as a leading company in the consumer packaging sector. As a listed company with a market capitalisation exceeding €3.0 billion, we produce glass containers for food and beverage products and also offer a wide range of services, including logistic solutions and beverage filling activities. Our strong track record in the industrial sector, expanding geographical presence, high level of glass manufacturing expertise, and deep understanding of our customers' demands make us a trusted partner for numerous well-known food and beverage brands.

We currently produce over 9 billion containers per year, which are held in high regard by our portfolio of over 1,600 customers who have placed their trust in us. At Vidrala, we want to transform glass into a more ecological, economic, attractive and healthier product. To reach this ambitious goal, we are committed to following a path of constant innovation, which is mainly based on carrying out projects aimed at improving glass as a material and the manufacturing processes we employ. This steadfast commitment goes hand in hand with our strong responsibility for the safety and well-being of our employees, and with our ongoing efforts to consistently exceed our customers' expectations.

With over 4,500 employees, we are one of the leading manufacturers of glass containers in Western Europe and Latin America, supported by a network of nine strategically located production centres. Our activity takes place at three facilities in Spain, two in Portugal, three in the United Kingdom and Ireland and two in Brazil. Our manufacturing activity is an uninterrupted industrial process, operating 24 hours a day, 365 days a year.

Moreover, our corporate structure is underpinned by a solid shareholder base that supports our operations and business vision. Our board of directors is made up of experienced leaders who contribute their expertise and strategic vision to the company.

2. Our commitment to our customers

At Vidrala, our customers are at the heart of every decision we make. We have long-lasting relationships with a diverse portfolio of customers, including the vast majority of the leading food and beverage brands. Our bottles and jars cater to a variety of segments such as wine, beer, food preserves, water, spirits, and soft drinks. Complementing this, we offer logistics and beverage filling services, ensuring compliance with the highest quality and environmental standards.

Innovation and technology drive our production, enabling us to create containers that meet evolving consumer needs while redefining the glass manufacturing industry. Glass bottles are unparalleled in preserving food and beverages, as their inert nature prevents chemical reactions with the contents, safeguarding purity and taste. They also provide a robust barrier against light and UV rays, which is essential for preserving the quality of sensitive products. Additionally, glass is 100% recyclable without loss of quality, making it the best sustainable packaging choice.

New BD Viva Lite 75 cl 300g.

In 2024, Vidrala launched the BD VIVA LITE 75 CL 300g. bottle, which exemplifies our commitment to sustainability and innovation. This new bottle offers significant environmental benefits, including reductions in fossil fuel consumption, CO2 emissions, raw material usage, electricity consumption, or water usage. These improvements align with Vidrala's broader lightweight portfolio and decarbonisation strategy, helping our customers meet their sustainability goals while maintaining product excellence and competitiveness.

ENVIRONMENTAL IMPROVEMENTS

by switching from the BD VIVA model to the BD VIVA LITE model*

-52,959
kWh of fossil fuel

-52
kg of NOx

-9,821
kWh of electricity

-32
kg of SOx

-8,579
litres of water

-44,997
kg of raw materials

-1
kg of particles

-19,324
kg of CO_2 - Coloured glass

-28,840
kg of CO_2 - Flint glass

* Example for 1 million bottles

Angel Roldán
Chief Commercial Officer

"At the heart of our strategy is a simple principle: our customers come first. We invest intensely and forge long-term partnerships with our customers, founded on superior service, and a deep understanding of their expectations. Our team works closely with client partners to design and produce attractive and competitive glass containers with the highest quality and safety standards, helping our customers to sell and build successful brands in their markets."

3. Key environmental indicators

Environment

Glass is one of the most sustainable solutions for the environment and key to building a better and more circular economy. Nevertheless, glass manufacturing is an energy intensive process and, as such, a contributor to the generation of greenhouse gas emissions (GHG) and, therefore, global warming. With this in mind, for a number of years we have worked to find more efficient manufacturing methods. Despite the efforts and achievements in energy efficiency during this period, we are keenly aware at Vidrala that we face ongoing challenges in this area.

In this respect, Vidrala is advancing in the search for new energy sources, something that plays a pivotal role in the transition towards a greener and more sustainable future. This will enable us to contribute to the well-being of the planet and to mitigate our carbon footprint. Furthermore, these new energy sources will help us to diversify and secure future energy supply, as well as unbind us from the price fluctuations associated with traditional energy sources.

Energy consumption

	Absolute value (kWh)			Relative value (kWh/tmg)		
	2023	2024	% Var.	2023	2024	% Var.
Total energy consumption (kWh)	**4,327,412**	**4,314,383**	**-0,3%**	**1,563.45**	**1,520.49**	**(2.7)%**
Fuels	3,605,577	3,538,827		1,302.66	1,247.17	
Electricity	331,052	385,155		119.61	135.74	
Renewable	390,783	390,400		141.19	137.59	

(*) Data restated to reflect our current perimeter, including Vidroporto and excluding the Vidrala Italy operations.

We work every day at Vidrala to lead the sustainable transition of the glass sector. In this regard, since 2019 we have worked to calculate and report our scope 1, 2 and 3 carbon footprints, focusing efforts at a group level to improve our annual performance and commitment as we advance towards decarbonisation.

Our work at Vidrala is aligned with the SBTi (Science Based Targets initiative) to set greenhouse gas emission targets that conform to the Paris Agreement. This initiative is linked to the Carbon Disclosure Project (CDP), the United Nations Global Compact, the World Resources Institute (WRI) and the World Wide Fund for Nature (WWF). In this particular area, our aim is to reduce our scope 1 and 2 greenhouse gas emissions in the short term by 47% and our scope 3 emissions by 28%, both by 2030 and with respect to our 2019 figures. This will contribute to preventing the worst effects of climate change and make sure our company is ready for the future.

In this respect, we have managed to reduce our Scope 1 and 2 emissions by 3.7% in absolute terms compared to 2023. In terms of emissions intensity (measured as tonnes of CO2e per tonne of melted glass), we have achieved a reduction of 6.1%.

This year, we achieved a 6.1% reduction in Scope 1 and Scope 2 emissions per tonne of melted glass.

CO_2 emissions

	Total emissions (tCO2e)*			Carbon intensity (tCO2e/tmg)		
	2023	2024	% Var.	2023	2024	% Var.
Scope 1 + 2 (market-based)	**984,395**	**955,838**	**(2.9)%**	**0.356**	**0.337**	**(5.3)%**
Scope 1 + 2 (location-based)	**1,051,311**	**1,011,999**	**(3.7)%**	**0.380**	**0.357**	**(6.1)%**
Scope 1	944,389	905,978		0.341	0.319	
Scope 2 (market-based)	40,006	49,859		0.014	0.018	
Scope 2 (location-based)	106,922	106,021		0.039	0.037	

(*) Data restated to reflect our current perimeter, including Vidroporto and excluding the Vidrala Italy operations. Scope 1 includes emissions from consumption of natural gas and other fuels, decarbonisation of raw materials, leaked refrigerants and use our fleet.

Emissions

	Total emissions (kg)*			Valor relativo (kg/tmg)		
	2023	2024	% Var.	2023	2024	% Var.
NOX	4,503	2,968	(34.1)%	1.63	1.05	(34)%
SO2	3,304	3,045	(7.9)%	1.19	1.07	(8)%
Particles	188	179	(4.4)%	0.07	0.06	(4)%

(*) Data restated to reflect our current perimeter, including Vidroporto and excluding the Vidrala Italy operations.

Water consumption

	GLASS			BEVERAGES			TOTAL		
	2023	2024	% Var.	2023	2024	% Var.	2023	2024	% Var.
Total water consumption (m^3)	699,906	704,753	0.70 %	566,541	369,118	(34.80)%	1,266,447	1,073,871	(15.20)%
Water intensity ratio (m^3/tmg)	0.253	0.248	(1.80)%	1.642	1.075	(34.50)%	0.458	0.378	(17.30)%

(*) Data restated to reflect our current perimeter, including Vidroporto and excluding the Vidrala Italy operations.

Glass as a material offers many benefits. Its high recyclability without loss of quality allows it to be used infinitely, which reduces demand for raw materials. Given its durable and resistant qualities, glass ensures protection against external contamination and provides a long useful life. By requiring less energy and generating fewer greenhouse gas emissions compared to production from virgin raw materials, it contributes to a more circular economy.

This set of characteristics, combined with the fact that it is made from natural and abundant raw materials, makes glass the most sustainable packaging material, in contrast to other materials derived from finite fossil fuels.

In 2024, we managed to increase our cullet consumption by more than 53% per tonne of melted glass, which represents an 8% increase vs 2023 figures.

Cullet and raw materials

	Absolute value (t)			Relative value (t/tmg)		
	2023	2024	% Var.	2023	2024	% Var.
Consumption of raw materials	3,093,294	3,113,661	0.7 %	1.12	1.10	(2)%
Cullet and other secondary reused or recycled components	1,362,653	1,514,818	11.2 %	49.2%	53.4%	8 %

(*) Data restated to reflect our current perimeter, including Vidroporto and excluding the Vidrala Italy operations.

4. Awards and recognitions

In 2024 we have proudly received numerous prestigious awards, reflecting our commitment to excellence, sustainability, and community impact:

- Nature and Biodiversity Award (Business in the Community NI): Recognising our efforts in promoting biodiversity.
- Platinum NI Environmental Benchmarking Survey (Business in the Community NI): Acknowledged for environmental leadership.
- Diversity Excellence Award (Diageo): For fostering an inclusive workplace culture.
- Gold Newcomer Award (In-House Recruitment - IHR): Celebrating the success of bringing recruitment services in-house.
- Marketing Impact Award (British Glass): For innovative glass packaging campaigns.
- The Manufacturer MX Awards: Recognised for Supply Chain Excellence, Operational Excellence, Young Manufacturer of the Year (Sam Bennington), and Manufacturer of the Year (awarded to Encirc).
- Award for the Internationalisation of Alava Companies (Chamber of Commerce of Álava): Recognizing socially responsible internationalisation.
- COPE Álava 2024 Awards: For contributions to economic growth in Álava.

Continuing with the awards, in this year, according to the report published by the Carbon Disclosure Project (CDP), we have achieved a 'B' score in both Climate Change and Water Management, which reveals the Company's environmental performance, management and progress in sustainability.

The CDP score is closely linked to and aligned with the Taskforce for Climate-Related Financial Disclosures (TCFD), Science-Based Targets (SBTs) and Sustainable Development Goals (SDGs). The scores assess companies' awareness of environmental issues, its governance and management of sustainability strategies and progress towards environmental stewardship.

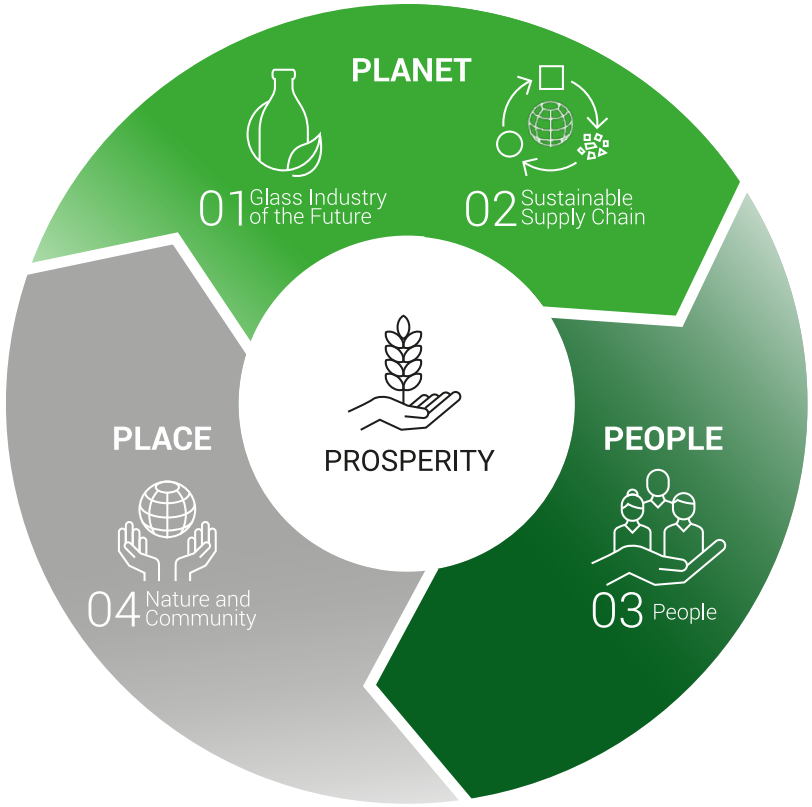
CDP
DISCLOSURE INSIGHT ACTION

OBJETIVOS DE DESARROLLO SOSTENIBLE

SCIENCE BASED TARGETS

4.2 PART II: Our Sustainability Strategy

Vidrala's sustainability strategy is guided by our 4P framework: People, Place, Planet, and Prosperity. This framework ensures that our operations are aligned with long-term sustainability goals, addressing industry challenges while creating value for all stakeholders. In 2024, we focused our efforts across four main work groups - Glass Industry of the Future, Sustainable Supply Chain, People, and Nature and Community, each supporting a specific pillar of the 4P framework.



GLASS MADE GOOD

4P
PEOPLE
PLACE
PLANET
PROSPERITY

1 Glass industry of the future

- Glass of the future
- Furnace of the future
- Smart manufacturing

2 Sustainable supply chain

- Recycled Raw materials
- Sustainable energy
- Supplier sustainability policy

3 People

- Health & safety
- Talent & People Development
- Engagement, Equity, Diversity & Inclusion
- Workplace and well-being

4 Nature and Community

- Biodiversity
- Water
- Community

4.2.1 PLANET

Reducing environmental impact through reinventing the Glass Industry of the Future and cultivating a Sustainable Supply Chain

Our Planet pillar encompasses Vidrala's dedication to reducing our environmental footprint. Through the Glass Industry of the Future and Sustainable Supply Chain work groups, we aim to advance sustainable practices and reduce emissions across our operations.

1. Glass industry of the future

- Glass of the future
- Furnace of the future
- Smart manufacturing

A. Furnace of the future

Vidrala focuses on optimizing furnace technology with increased electrification and energy efficiency. Our emphasis on energy conservation - captured in our motto "the most sustainable kWh is the kWh that is not consumed[2] - positions Vidrala as the industry leader with the lowest emission factor.

> Our ultra-competitive furnace hybrid solutions combine both gas and electric heating, with a lower emission profile. These allows us to meet our ambitious carbon reduction targets while preserving flexibility and furnace life.

As the most energy-intensive component of glass production, furnaces are a critical focus area for achieving substantial reductions in greenhouse gas emissions. Rethinking this technology is crucial for achieving decarbonisation while maintaining operational efficiency and cost-effectiveness.

Reimagining furnace technology

Vidrala is continuously optimizing furnace design to improve energy efficiency and minimise resource consumption. We are focused on technologies that allow us to integrate alternative fuels, advance in energy efficiency and recovery, and increase our electrification in a flexible way. We are exploring multiple technological pathways, currently centered in ultra-competitive hybrid solutions combining both gas and electric heating, with a lower emission profile that allows us to meet our ambitious carbon reduction targets while preserving flexibility and furnace life.

Batch and cullet preheater at Santos Barosa

At our Santos Barosa plant in Marinha Grande, Portugal, Vidrala has implemented a cutting-edge batch and cullet preheater system, further enhancing our commitment to sustainability. This innovative system captures waste heat from furnace exhaust gases and uses it to pre-warm the batch and cullet mixture before it enters the furnace. The preheater offers multiple benefits:

- Energy savings: By pre-warming the batch, the preheater reduces the amount of energy needed to reach the required melting temperature.
- Increased cullet usage: The system allows the integration of higher percentages of recycled cullet, promoting circularity and reducing the need for virgin raw materials.
- Improved furnace longevity: Consistent thermal input reduces the stress on the furnace, preventing wear and extending its operational life.

[2] An emission factor of 0.36 tCO_2 per tonne of melted glass has been determined through our internal calculations. A competitor analysis was performed based on CDP 2022 reports of our five main competitors in the countries where we operate.

Collaboration for success

The path to implementing next-generation furnaces requires substantial investment and collaboration with industry stakeholders, including furnace manufacturers, energy providers, and policymakers. Vidrala is working closely with these stakeholders to ensure access to low-carbon energy sources and supportive regulatory frameworks, fostering an environment that accelerates the adoption of sustainable technologies.

Through these efforts, Vidrala remains at the forefront of the glass industry's transition to a low-carbon future, delivering innovative solutions that enhance sustainability and create long-term value for the company, its customers, and society.

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ZeroCO_2-Glas project

Led by the IPGR (International Partners in Glass Research) were Vidrala is a relevant member, the ZeroCO_2-Glas project is a pioneering initiative aimed at revolutionizing the glass manufacturing process to achieve net-zero emissions in container production. The main goal of this project is to develop a hydrogen-powered glass melting furnace that enables the production of glass containers with net-zero emissions and significant energy savings, thereby addressing the critical challenge of reducing energy consumption and greenhouse gas emissions in our industry.

This installation started last year and is already providing valuable insights into operating new methods of glass melting with low CO2 emissions. Specifically, through this initiative, we aim to:

- Use carbonate-free raw materials and condition them for the production process.
- Operate the glass melting furnace as a highly flexible hybrid system that uses both electricity and hydrogen.
- Design a glass melting furnace with a cutting-edge and innovative approach.

The ZeroCO_2 project is the most significant research initiative in terms of investment and importance in the history of both Vidrala and IPGR. Over the next two years, we expect to gather valuable data on hydrogen and high-electricity melting processes initially, followed by new glass compositions.

B. Glass of the future

We are developing glass formulations that use fewer carbonated materials, reducing greenhouse gas emissions. Collaborations with initiatives like IPGR and SHU support innovation in sustainable glass manufacturing.

Our vision for the glass of the future revolves around two complementary paths: exploring new possibilities for glass composition and enhancing existing formulas with sustainable raw materials. These efforts reflect our commitment to reducing environmental impact while maintaining the quality, durability, and safety that define glass as a packaging material.

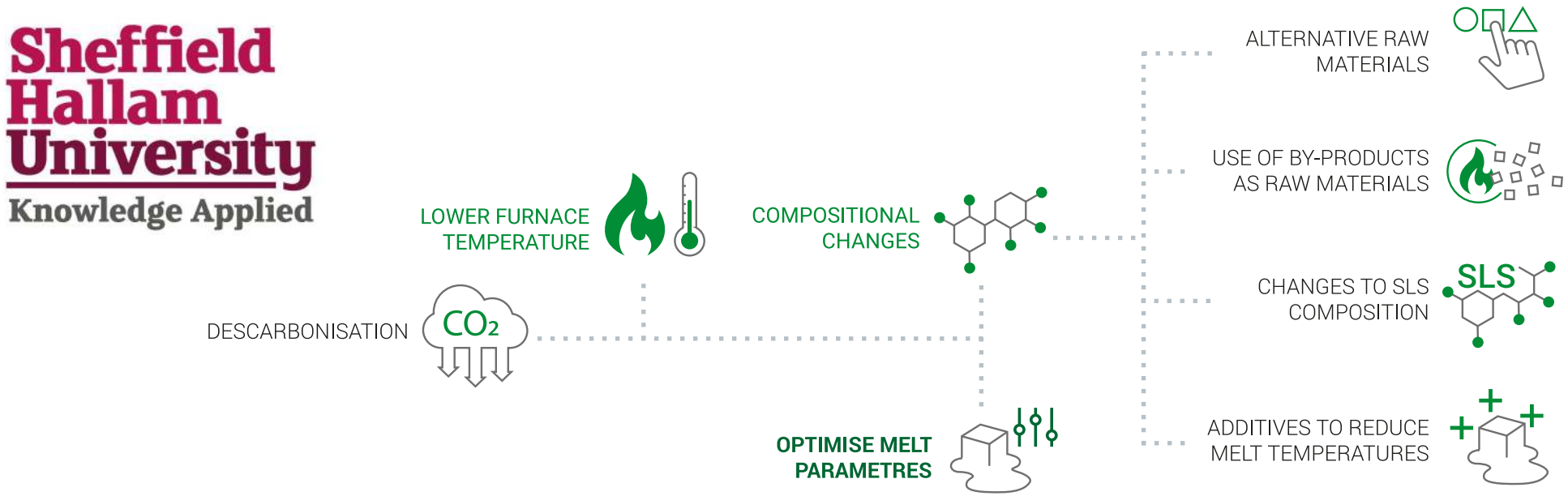
Discovering new possibilities for glass

We are investigating alternative glass compositions that offer improved sustainability and performance. This process includes:

- Identifying innovative raw materials that can reduce energy consumption or emissions during production.
- Evaluating and selecting viable candidates through rigorous analysis.
- Conducting laboratory tests to ensure suitability for production and consumer use.
- Testing promising candidates in industrial furnaces to validate their potential on a larger scale.

New Glass Compositions

A good example of this is the ambitious project on New Glass Compositions, initiated in collaboration with Sheffield Hallam University, where innovative methods of manufacturing glass for packaging will be explored. This project aims to develop glass compositions that are better suited to meet the challenges of the future, such as enhancing sustainability, improving energy efficiency, and reducing environmental impact. By pushing the boundaries of traditional glass manufacturing, this initiative seeks to create packaging solutions that are not only more environmentally friendly but also more adaptable to the evolving demands of the industry and society.



Improving current formulas with alternative raw materials

Simultaneously, we are working to optimise existing glass compositions by incorporating alternative raw materials like industrial byproducts and recycled content. These materials not only reduce the need for virgin resources but also enhance circularity in glass production.

Vidrala and Acciona Energía pioneer biomass slag reuse for sustainable glass production

Vidrala partnered with Acciona Energía to launch a pioneering project utilizing biomass slag as a raw material in glass production. This pilot initiative led to the successful production of 18.3 million glass bottles, incorporating 230 tons of biomass slag - a byproduct generated during renewable electricity production at Acciona's Briviesca biomass plant in Burgos.

Biomass slag, rich in silica, replaced part of the silica sand and soda ash typically used in glassmaking. This innovation reduced the use of virgin raw materials and also optimized the production process, cutting CO2 emissions The slag was processed in Asturias, and bottle manufacturing took place at Vidrala's Aiala Vidrio plant in Llodio. The result maintained the high-quality standards of Vidrala's glass containers, meeting all durability and performance benchmarks.

The success of this pilot project demonstrates the feasibility and impact of integrating industrial byproducts into glass production. Vidrala plans to further explore and expand this approach, reinforcing its leadership in sustainable innovation and contributing to a greener future for the glass industry.

C. Smart manufacturing

We are continuously advancing in automation and digital monitoring to improve operational efficiency, reduce noise and heat exposure, and enhance workplace conditions, making glass production safer and more attractive for employees.

Our approach to smart manufacturing is reshaping how glass containers are produced, integrating cutting-edge technologies to optimise efficiency, sustainability, and quality across the entire production cycle. This transition goes beyond traditional automation, leveraging data, robotics, and advanced analytics to create a more connected and adaptive manufacturing environment with a process driven mindset, with people at the core and technology as an enabler.

For us, smart manufacturing involves the application of:

- Automation and robotics to handle repetitive tasks and enhance precision.
- Real-time data and analytics for monitoring performance and making informed decisions.
- Closed-loop systems to refine processes continuously, from hot-end to cold-end operations.
- Collaborative tools like the Digital Furnace Management Tool and advanced cockpit systems to provide real-time insights for operators.

This comprehensive approach allows Vidrala to maximise productivity while reducing energy consumption, waste, and operational disruptions.

Ongoing initiatives and 2024 projects

Vidrala has implemented several high-impact projects as part of its smart manufacturing roadmap:

- Digital Furnace Management Tool: A completed rollout to improve furnace operation through data-driven insights.
- Melting Process Digitalisation: Enhances monitoring and control to optimise energy use and emissions.
- Blank Swabbing Robots: Deployed to improve safety and consistency in mould operations.
- Cold-End Control Tower: An initiative to centralise and automate quality control processes.

At the heart of Vidrala's smart manufacturing strategy is data governance, ensuring information is accessible, structured, and actionable. Tools like the Fenix OEE (Overall Equipment Effectiveness) Features and iPlant 2.0 enable process monitoring and continuous improvement. These innovations empower decision-making that is not only efficient but also aligned with Vidrala's long-term vision for sustainable glassmaking.

Oriol Moya
Chief Operations Officer

"At Vidrala, sustainability is at the heart of our mission and operations. For us, it means meeting today's needs without compromising tomorrow's possibilities - making decisions that protect our environment, enhance social well-being, and ensure long-term economic viability. We are continuously seeking balance, whether it's advancing glass fusion technologies, transitioning to cleaner energy sources, or implementing recycling initiatives. Yet, even as we invest in cutting-edge processes, we know that our people will always make the greatest difference, driving innovation and ensuring Vidrala's future remains both competitive and sustainable."

2. Sustainable supply chain

- Recycled Raw materials
- Sustainable energy
- Supplier sustainability policy

A. Recycled raw materials

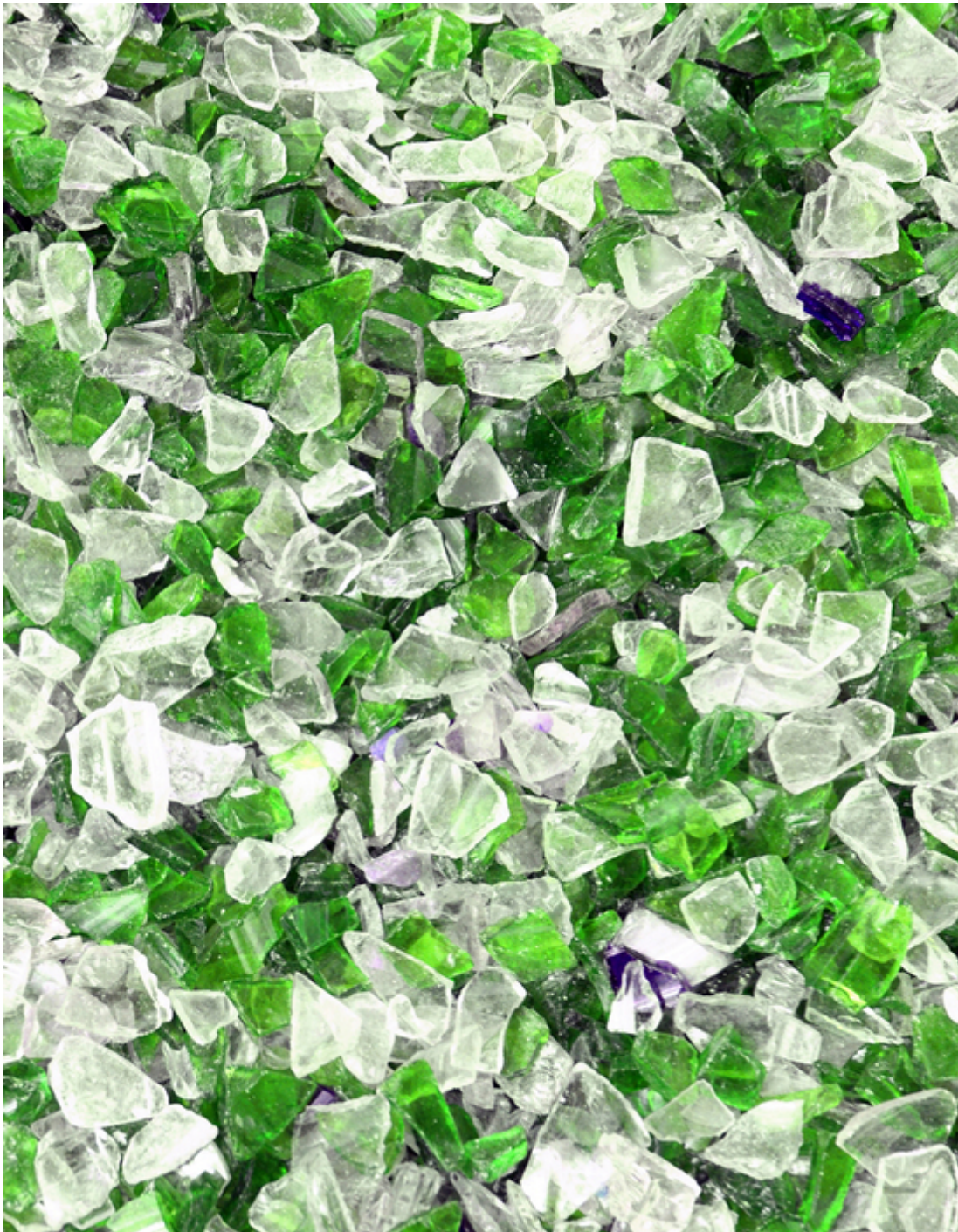
Recycled glass (cullet) is a fundamental component of Vidrala's strategy for sustainable glass manufacturing. Its use enhances the circular economy, reduces reliance on virgin raw materials, and minimises environmental impact. Using one ton of cullet replaces 1.2 tons of virgin raw materials, which helps reduce energy consumption, CO2 emissions, and furnace wear, ultimately extending the lifespan of production facilities.

Vidrala's cullet strategy is built on a holistic approach that addresses regional disparities in cullet supply and demand. The strategy focuses on three key areas:

- Boosting Collection and Treatment Rates: Collaborating with stakeholders to improve recycling infrastructure and enhance the quality and availability of cullet.
- Advancing Technologies: Investing in state-of-the-art sorting and processing systems to ensure cullet quality meets production standards.
- Maximizing Recycled Content: Establishing ambitious targets for integrating recycled glass across facilities, consistently achieving higher levels. At Vidrala, we are committed to increasing our cullet usage up to 66% by 2030

Using recycled cullet aligns with Vidrala's decarbonisation goals by lowering the melting temperature during production, which reduces energy consumption and fossil fuel use. This contributes directly to lowering greenhouse gas emissions. Cullet-based production also stabilises raw material supply chains, enhancing economic efficiency while supporting environmental objectives.

The push for sustainability drives the need for expanded cullet usage. Vidrala acknowledges challenges such as market fluctuations and regulatory demands but remains dedicated to scaling up recycling initiatives and strengthening partnerships. These efforts ensure Vidrala leads the industry toward achieving a fully circular production model.



B. Sustainable energy

Our sustainable energy strategy is centered on transitioning to sustainable energy sources to decarbonise our operations. We continue incorporating renewable energy sources, such as solar and wind power, while also exploring alternative gases like bio-methane and hydrogen. These initiatives are critical to achieving our decarbonisation targets.

Commitment to low-carbon energy

Vidrala's commitment to achieving 100% renewable electricity by 2030 is underpinned by a diversified energy transition plan, which includes:

- On-site Generation: Development of Solar and Wind generation assets across facilities, significantly boosting self-sufficiency and reducing usage of external power grids.
- Near-Site Generation: Explore generation project opportunities near production facilities maximizing efficiency and reducing grid usage by bringing closer generation and consumption.
- Power Purchase Agreements (PPAs): Securing long-term agreements with renewable energy providers to ensure consistent, sustainable power supply at predictable costs.

Vidrala signs PPA with Acciona Energía

Vidrala signed a Power Purchase Agreement (PPA) with Acciona Energía for the supply of renewable energy that will cover between 20% and 25% of the company's electricity needs over the next 10 years. With this milestone, Vidrala reaffirms its position as a pioneer in sustainability within the glass industry by committing to long-term sustainable energy solutions and advancing the transition towards a cleaner and more planet-friendly future for the industry.

The contract will allow Vidrala to source clean electricity for its operations at several manufacturing plants in Llodio (Álava), Caudete (Albacete), Castellar del Vallés (Barcelona), and Marinha Grande (Portugal). All the energy will be 100% renewable and sourced from Acciona Energía's wind farms.

This is the first PPA that Vidrala integrates into its decarbonisation strategy to reduce emissions, and thanks to it, will avoid the emission of 150,000 tons of CO2 into the atmosphere during the contract's duration. Along with self-consumption projects and Guarantees of Origin (GOs), PPAs form the company's plans for the decarbonization of 100% of its electricity consumption by 2030. In this way, Vidrala strengthens its position as a leader in industrial sustainability while ensuring a cleaner, more diversified, secure, and competitive energy supply.

Besides, the transition to electrified systems requires overcoming technical and logistical hurdles, including grid limitations. Vidrala is addressing these through new connection project development with electrical distribution companies to enhance grid capacity and ensure reliability for future renewable energy demands - and exploring demand-side management: utilizing advanced systems to optimise energy consumption, aligning production schedules with grid availability and renewable energy peaks.

Also, Vidrala is actively exploring alternative renewable gases, including Bio-methane and Hydrogen, to replace traditional fossil fuels in key operations by exploring investments in infrastructure and partnerships aimed at testing the scalability and integration of renewable gases into production processes.

UK Prime Minister visits Encirc to unveil historic hydrogen investment that will power our furnaces

UK Prime Minister Sir Keir Starmer visited our Encirc division's plant in Elton on 4 October, accompanied by the Chancellor and the Energy Secretary. During the visit, the Prime Minister announced a funding package aimed at reducing emissions from UK industry. This plan, which includes £21.7 billion over the next 25 years, aims to boost the adoption of hydrogen and carbon capture, use and storage (CCUS).

The announcement will see major funding for two carbon capture sites which will inject growth into the industrial heartlands of the North West and North East of England. The plans have been welcomed by Encirc as it continues to lead the way on decarbonisation.

C. Supplier sustainability policy

To ensure sustainable practices across our supply chain, Vidrala collaborates with suppliers to promote responsible sourcing, reduce carbon impacts, and meet our high environmental standards. These partnerships strengthen both our supply chain resilience and our environmental commitments. Recognizing the critical role of suppliers in our journey toward achieving a net-zero carbon footprint, we prioritise collaboration, innovation, and accountability to foster sustainable practices.

Vidrala has developed a Sustainable Procurement Policy, aligned with the Supplier Code of Conduct which is based on the following principles:

- Sustainability Integration: our suppliers are integral partners in reducing greenhouse gas (GHG) emissions and enhancing circularity. Vidrala expects its suppliers to adhere to the Science-Based Targets initiative (SBTi) framework for emissions reduction in alignment with global climate goals.
- Climate Action: our suppliers must actively work to measure, report, and reduce Scope 1, 2, and 3 emissions, with priority given to innovations in energy efficiency and renewable energy adoption. Vidrala collaborates with suppliers to explore low-carbon solutions, including alternative raw materials, energy-efficient logistics, and decarbonised manufacturing processes.
- Resource Efficiency: our suppliers are encouraged to optimise resource usage, implement recycling initiatives, and support Vidrala's mission to close the glass loop by maximizing the recycled content in production.
- Ethical and Social Responsibility: adherence to high standards of human rights, labor conditions, and workplace safety is mandatory for all suppliers. Vidrala promotes fair wages, diversity, and equitable working conditions across its supply chain.
- Transparency and Accountability: our suppliers are required to disclose their sustainability performance, including environmental, social, and governance (ESG) metrics, via standardised reporting frameworks.
- Continuous Improvement: Vidrala supports suppliers in their sustainability journey by providing resources, training, and partnership opportunities. Suppliers are expected to engage in continuous improvement programs to enhance their ESG performance and align with Vidrala's sustainability objectives.

ESG Supplier risk assessment

Vidrala recognises the importance of integrating environmental, social and governance criteria into the management of the supply chain. To ensure the identification, assessment and mitigation of risks in this area, Vidrala has implemented a structured approach based on international best practices.

Specifically, Vidrala has implemented a system to evaluate its highest-risk suppliers. Currently, a total of 370 suppliers are undergoing an assessment based on key criteria, including financial stability, compliance, business continuity, operational performance, Cybersecurity and ESG criteria.

Risk Matrix + Go Supply Evaluation + Audits + Action Plans + Monitor and Control

The process begins with the Development of a Risk Matrix that classifies suppliers based on a series of critical criteria. These include financial indicators, ESG aspects, strategic financial impact, level of dependency, among others. This Matrix allows Vidrala to prioritise and categorise suppliers according to their criticality to the organsation.

Once critical suppliers have been identified, they undergo a complete evaluation through the GoSupply Platform generating a score that allows Vidrala to benchmark supplier performance against established standards. Those suppliers with the lowest scores are selected for specific audits. These audits are conducted by specialised teams and aim to identify compliance gaps and areas of improvement. Based on the results obtained, corrective action plans are developed which include concrete measures to improve their ESG performance with defined timeliness and continuous monitoring.

This approach enables Vidrala to proactively manage ESG Risks associated with Supply Chain while fostering responsible and sustainable practices in collaboration with our strategic partners. The ultimate goal is to analyse 100% of Vidrala's strategic suppliers to ensure they are fully ESG-compliant.

4.2.2 PEOPLE

- Health & safety
- Talent & People Development
- Engagement, Equity, Diversity & Inclusion
- Workplace and well-being

Empowering our people for a sustainable future

The People pillar represents Vidrala's dedication to fostering a supportive, inclusive, and high-performing team in a great workplace. With the right people - engaged, healthy, balanced, and performing at their best - we aim to ensure the long-term sustainability of our business while enhancing employee well-being and growth.

A. Health and Safety

Our people´s health and safety is a foundational responsibility, integral to our operational and sustainability strategies. Guided by our ISO 45001:2018-certified Health and Safety Management System, we aim to proactively anticipate and mitigate potential physical and mental risks, ensuring a safe, healthy, and supportive working environment for all.

Our key initiatives and achievements for Health and Safety include:

- Health and Safety standards: all manufacturing facilities operate in full compliance with ISO 45001:2018 guidelines, ensuring a systematic approach to managing health and safety risks. Regular training programs and updates guarantee alignment with global standards and local regulatory requirements, fostering a consistently safe work environment.

- Behavioural safety program: a targeted program addressing workplace risks such as burns, cuts, and muscle strains, this initiative raises awareness and promotes proactive safety behaviours. In 2024, our accident prevention training focused on emergency response, first aid, accident investigation, and safety awareness, strengthening our commitment to a safer workplace.

Joseba Fernández de Mendia
Chief People, Culture & Transformation Officer

"Our people are the foundation of our long-term success. At the core of Vidrala's culture is a commitment to delivering an experience that empowers teams to excel and innovate, in an environment where health, safety, and inclusive growth thrive. We invest in talent, skills development, champion diversity, and promote well-being initiatives that nurture both personal and professional progress to boost a high performing culture. We ensure that every person feels supported and valued, driving sustainable results that benefit our people, our customers, and our broader community."

- Psychosocial risk management: annual evaluations identify physical and psychosocial risks, including ergonomics, communication, leadership, and work organisation factors. Through confidential interviews and meticulous data collection, we implement targeted corrective measures to enhance employee well-being and mitigate identified risks effectively.

- R3 Safety Culture program: this initiative prioritises reducing risk exposure, recycling safe habits, and reusing positive safety learnings. With 38 R3 teams active across Spain and Portugal, the program fosters a "Safe Behaviour Culture" built on trust, respect, and shared responsibility. Recognised by OSALAN and the Basque Government, it exemplifies best practices in integrating health and safety into business systems.

- Daily monitoring and transparency: including initiatives such as "CuidaMes", which involves anonymous safety observations during work shifts to monitor adherence to safe behaviours, and Daily Safety Signals, a system for real-time tracking and resolution of safety incidents, ensuring prompt corrective measures and displaying performance metrics, reinforcing our culture of safety and responsiveness.

Industrial Safety at Vidrala

The Industrial Safety at Vidrala aims to ensure the safety of people, facilities, and the environment, as well as to guarantee operational continuity and regulatory compliance across all our plants.

To achieve this, we use the Bow Tie methodology, a tool that allows us to identify and analyze risks in a structured manner by breaking down the causes; prevention, control, and mitigation barriers; and the possible consequences of each risk event.

The risks are categorised and prioritised and then moved into the implementation phase. During this phase, we conduct a detailed assessment of the current state of each plant in relation to the barriers defined in the Bow Tie. This stage allows us to identify the barriers that are already implemented and functional, as well as those that need to be applied or adjusted, ensuring comprehensive risk management.

To ensure project control, we conduct periodic audits that measure the level of implementation and effectiveness of the barriers in each plant. These audits allow us to evaluate the achievement of safety objectives and identify areas for improvement. Additionally, we have a contingency plan to analyze any events that occur, identifying the causes and adjusting the barriers to prevent recurrence, thus promoting continuous improvement.

B. Talent & People Development

Talent management and people development is at the core of our sustainable business strategy. In 2024, we continue to prioritise talent management and development, ensuring our collaborators feel valued and engaged in their work. Our aim is to help every individual achieve their short- and long-term professional and personal objectives through personalised development programs and global initiatives across the Group.

> In 2024, we reached a total of 102,917 training hours through personalised development programmes and global initiatives all across Vidrala.

HORIZON

vidrala

The One Horizon Programme, started in 2015, continues to play a pivotal role in the continual improvement of our talent. Renewed every three years, it targets over 350 operational leaders, including line managers, supervisors, and technical specialists. This programme focuses on cultivating skills from strategic short-, medium-, and long-term perspectives, facilitating the exchange of knowledge across the Group, and providing accessible online training to all participants. It addresses three key competencies: enhancing decision-making, communication, and influence skills; building abilities in providing purpose and direction, fostering relationships, and developing team capabilities; and strengthening skills in change management, quality management, continual improvement, risk management, and human resources functions.

Additionally,, our Strategic Leadership Programme aims to enhance leadership and team management skills, empowering participants to drive the organisation towards achieving current and future objectives. It emphasises ethical behaviour, commitment to learning, and continual development, directly impacting the company's success.

We encourage and motivate our employees through customised development programmes based on performance appraisals. These programmes identify specific training needs, considering challenges that require new or renewed skills and knowledge. This approach contributes to professional growth and helps employees achieve their personal goals..

Continuing our commitment to nurturing future talent in engineering and innovation, the Cantera Programme offers engineering students a nine-month professional experience. Participants work on real projects in a high-performance industrial environment whilst completing their final Bachelor's or Master's projects. Practical training at one of our factories, combined with mentorship, provides invaluable industry exposure.

Building on the Cantera experience, the Graduates Programme involves a one-year engagement on an operating internal project, combined with technical training, soft skills development, and language skills. Vidrala graduates are individuals who have demonstrated dedication, passion, and excellence in engineering. The programme emphasises effective communication and leadership development, including mentoring sessions where experienced professionals share key knowledge for long-term success.

At Vidrala, we remain committed to fostering an environment where employees can thrive, advancing their skills whilst contributing to our collective success. Through innovation, sustainability, and inclusivity, we are building resilient people prepared for the future. Our Mentorizon Program is key for that purpose.

C. Engagement, Equality, Diversity and Inclusion

Engagement, Equality, Diversity, and Inclusion (EDI) are deeply embedded in our organisational culture and guide our efforts to create a workplace that reflects our values. We are committed to ensuring that every employee could thrive, contributing their unique perspectives and talents to our collective goals. Through strategic initiatives and a focus on continuous improvement, Vidrala aims to cultivate an inclusive environment where diversity drives innovation, collaboration, and sustainable growth.

The One Horizon Programme, started in 2015, continues to play a pivotal role in the continual improvement of our talent. Renewed every three years, it targets over 350 operational leaders, including line managers, supervisors, and technical specialists. This programme focuses on cultivating skills from strategic short-, medium-, and long-term perspectives, facilitating the exchange of knowledge across the Group.

MENTORIZON

SHARING KNOWLEDGE, SUPPORTING GROWTH

Women In Manufacturing

Operating in an industry historically dominated by men, we remain committed to advancing gender representation and creating opportunities for women throughout our company. To reinforce this commitment, we have launched the Women in Manufacturing (WIM) initiative, designed to integrate more women into Vidrala's workforce and promote a fair and inclusive environment. While progress has been made, there remains significant room for improvement, particularly in leadership and operational roles.

As a starting point, the WIM initiative focuses on adapting Vidrala's facilities and policies to better meet the needs of women, ensuring a fairer work environment. This includes implementing ergonomic improvements in production areas, tailoring personal protective equipment (PPE) to fit women, and enhancing non-production spaces for greater inclusivity.

Besides, WIM aims to attract more female talent by identifying barriers to recruitment and positioning Vidrala as an employer of choice for women in the manufacturing industry. Through targeted recruitment campaigns and addressing factors of inequality, the initiative seeks to significantly increase female representation across the organisation.

To ensure lasting change, WIM places a strong emphasis on education and awareness. By mapping key stakeholders and implementing comprehensive communication and consciousness-raising strategies, the initiative strives to shift perceptions and foster an organizational culture grounded in equity and respect.

WIM is led by a diverse and motivated team that reflects Vidrala's multicultural identity. Together, they share a vision of creating a workplace where gender is no longer a barrier, enabling all employees to reach their full potential. This initiative reinforces Vidrala's commitment to building an inclusive and equitable future for everyone.

We are WIM

Women in Manufacturing

CHANGING THE MINDSET FOR EQUALITY AT VIDRALA

Great Place To Work

In 2024, Vidrala's corporate services have once again been honoured with the Great Place to Work certification. This consecutive recognition underscores our commitment to fostering a positive and inclusive workplace culture.
At Vidrala, we prioritise active listening and engagement with our workforce, recognising that a supportive work environment not only enhances employee well-being but also drives organisational success. The feedback received during the certification process reflects a deep sense of pride among our team members, reinforcing our commitment to maintaining a culture of trust and respect.

Great Place To Work. Certified OCT 2024-OCT 2025 ESP

D. Workplace and well-being

Our workplace initiatives focus on building spaces that meet the diverse needs of our workforce. In previous years, workplace gap analyses were conducted across various facilities to identify and address specific areas for improvement. As part of our 2024 objectives, these insights have informed targeted actions, including the implementation of ergonomic standards, the development of sustainable workplace strategies, and measures to enhance overall employee satisfaction.

MOVE & HELP BE HEALTH

On well-being, Vidrala continues to integrate initiatives that address both physical and mental health across all operational sites. The "Be Healthy" program, already successfully implemented at multiple locations, remains a cornerstone of our approach, fostering active lifestyles and preventive health practices. Complementing this, we are scaling up our mental health programs in 2024 to provide comprehensive support, emphasising resilience and stress management. These programs are coupled with initiatives such as "Move & Help," which encourage physical activity while strengthening community ties. Additionally, other programs tailored to the diverse environments within the group stand out, including blogs and regular awareness campaigns on well-being topics, as well as the "Mental Health First Aiders" program.

4.2.3 PLACE

- Biodiversity
- Water
- Community

Nature and Community: strengthening community connections and environmental responsibility

The Place pillar reflects Vidrala's dedication to fostering prosperous communities and safeguarding the ecosystems that surround and sustain our operations. By integrating environmental stewardship with local engagement, we ensure that our business contributes positively to the regions where we operate.

A. Biodiversity

We recognise the critical role biodiversity plays in sustaining ecosystems, human well-being, and the long-term viability of our operations. As part of our commitment to creating the world's most sustainable glass containers, we strive to integrate biodiversity preservation across all facets of our business, guided by the Vidrala Biodiversity Policy and in alignment with global frameworks like the Kunming-Montreal Global Biodiversity Framework and the UN Sustainable Development Goals (SDGs).

Our Approach to Biodiversity

We employ a multi-faceted strategy that incorporates assessment, restoration, collaboration, and transparency to address our environmental footprint and enhance biodiversity outcomes.

- Impact Evaluation: we systematically assess our activities to identify direct and indirect impacts on biodiversity. This includes evaluating dependencies such as water resources, natural habitats near operational sites, and impacts through the supply chain.

- Ecosystem restoration and active conservation: we invest in habitat restoration initiatives, both within our facilities and in surrounding areas, prioritizing degraded ecosystems. This includes reforestation projects and partnerships with conservation organisations to protect endangered species.

- Sustainable practices in the value chain: collaborating with suppliers, we ensure biodiversity-conscious procurement practices and aim to minimise resource extraction impacts. We promote the use of recycled materials and advocate for circular design principles in glass manufacturing.

- Community engagement and collaboration: we work closely with local communities and stakeholders to foster biodiversity-friendly practices, including raising awareness and supporting education programs on ecological sustainability.

- Monitoring and reporting: Vidrala actively monitors its biodiversity initiatives through metrics aligned with the Taskforce on Nature-related Financial Disclosures (TNFD) recommendations. Annual progress reports include biodiversity performance indicators to ensure accountability.

> We strive to integrate biodiversity preservation across all facets of our business, guided by the Vidrala Biodiversity Policy and in alignment with global frameworks like the Kunming-Montreal Global Biodiversity Framework and the UN Sustainable Development Goals (SDGs).

Encirc Biodiversity Walk

At Encirc's Derrylin factory, biodiversity took a meaningful step forward with the official opening of our looped biodiversity walkway. The inauguration ceremony was graced by Kieran Harding, Managing Director of Business in the Community Northern Ireland, alongside invited community members and employees. The presence of Business in the Community was especially significant as the project stemmed from their Biodiversity Charter.

Biodiversity is an integral part of our sustainability strategy, reflecting our dedication to the protection and enhancement of natural habitats. The project, driven by Theresa Clarke and the Biodiversity Committee at Derrylin, with close to 50 members, showcases teamwork and shared purpose.

Besides, the creation of the walkway highlights the importance of collaboration. Valuable guidance from Ulster Wildlife and the Fermanagh & Omagh District Council played a crucial role, offering expertise that ensured the initiative's success.

Vidrala Forest

As part of Vidrala's commitment to sustainability and innovative team-building, this year's Sustainability Annual Meeting event inspired the continuation of the Vidrala Forest. Through a partnership with the NGO Tree Nation, Vidrala facilitated the planting of 135 Albizia Coriaria trees in Uganda, contributing to the Preservation of the Mt. Elgon Ecosystem and directly supporting local farmers' livelihoods.

This initiative goes beyond carbon sequestration through promoting sustainable agroforestry practices, empowering farmers to cultivate trees in ways that enhance biodiversity and fostering economic resilience in the region. For more details about the trees planted and the overarching project, participants can visit the dedicated Tree Nation profile.

B. Water

Managing water responsibly

Water is a vital resource for our operations and a key element in our commitment to sustainable glass manufacturing. Through our Water Ambition 2030 plan, we strive to ensure responsible and efficient water management across all production sites. This vision aligns with the United Nations Sustainable Development Goals (SDGs), particularly Goal 6 (clean water and sanitation) and Goal 12 (responsible consumption and production), reflecting our dedication to fostering a more sustainable and resilient future.

The water policy of Vidrala establishes our commitment to responsibly manage the water resource in all our industrial operations. We pledge to use water efficiently and responsibly, comply with current regulations and standards, continuously monitor and evaluate our water performance, train our employees in sustainable practices, collaborate with our stakeholders, foster innovation and continuous improvement, and promote transparency and disclosure of our efforts.

Vidrala's water policy

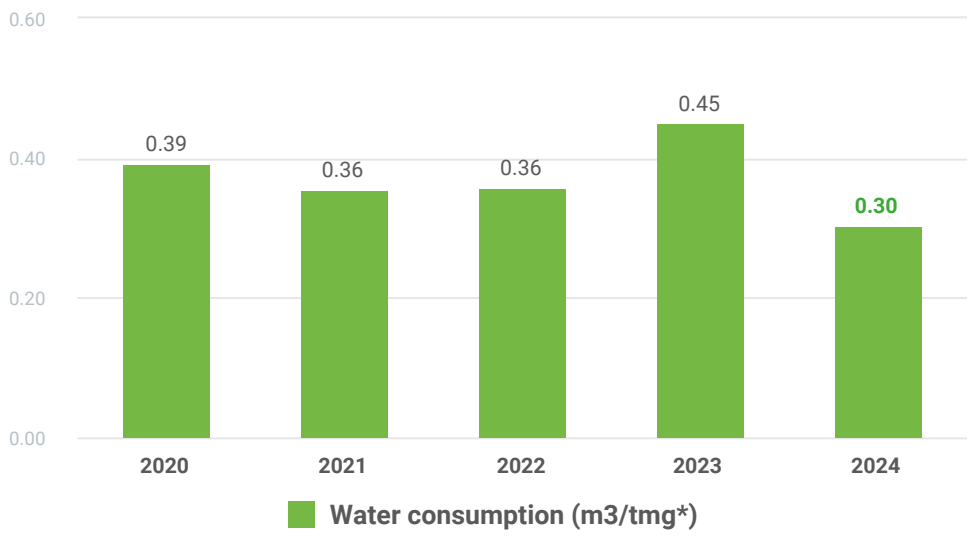
- Efficient water use: we pledge to use water efficiently and responsibly in all our operations. We will implement technologies and practices to minimise water consumption and maximise its reuse within our processes.
- Water conservation: we will adopt measures to conserve water in our facilities, including leak repairs, optimisation of supply systems, and rainwater harvesting whenever possible.
- Regulatory compliance: we will comply with all regulations and standards related to water use and discharge, as well as water quality standards established by competent authorities.
- Monitoring and evaluation: we will implement monitoring and evaluation programs to measure and control our water use, as well as to identify opportunities for continuous improvement in our water management.
- Training and awareness: we will provide training to our employees on the importance of responsible water management and equip them with the tools and knowledge necessary to actively contribute to our water conservation efforts.
- Stakeholder collaboration: we will collaborate with our stakeholders, including suppliers, customers, local communities, and environmental organisations, to develop and implement sustainable water management initiatives.
- Innovation and continuous improvement: we will foster innovation in technologies and practices related to water management and commit to continuously seeking opportunities to improve our efficiency and reduce our environmental impact.
- Transparency and disclosure: we will be transparent in our water management and publicly disclose our efforts, results, and challenges in this area to promote accountability and build trust with all our stakeholders.

Our Water Management System is designed to drive continuous improvements in water efficiency. We are focused on maximizing efficiency, minimizing environmental impact, and mitigating risks related to excessive water usage. As part of our commitment, we aim to reduce water consumption by 50% by 2030, compared to 2018 levels. This target is reinforced with specific reduction goals tailored to each community where we operate.

As part of our commitment to sustainability and resource optimisation, we continue to reduce the number of water-cooled equipment by implementing more efficient processes that minimise compressed air consumption. This, in turn, decreases the number of operational systems and the overall water demand for cooling.

Additionally, we are making significant improvements in water management to reduce internal movements, maximise reuse cycles, and ultimately lower overall consumption. Our focus on water treatment allows us to extend its use across different processes, enhancing efficiency and reducing environmental impact.

Furthermore, we are working on several innovative projects for rainwater harvesting, which will soon be implemented and will further strengthen our sustainability strategy.

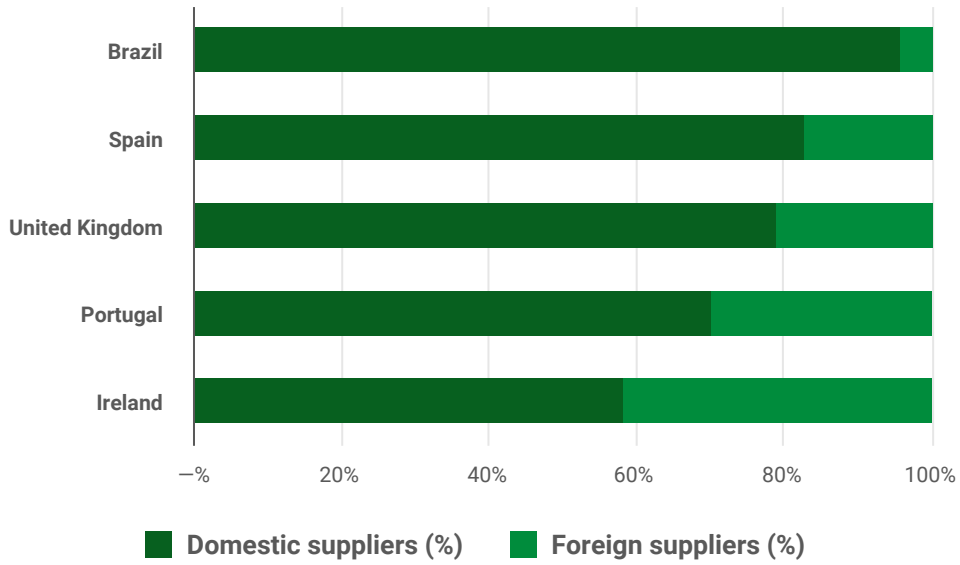


C. Community

Community engagement remains a cornerstone of our sustainability strategy as we have always been deeply connected and committed to the regions where we operate. Through our local purchasing programmes and our focus on fostering education and social inclusion, we aim to generate stronger local economies, sustainable relationships and lasting, positive impacts that resonate across generations.

Contracting and developing local suppliers, strengthening our value chain

We prioritise partnerships with customers and suppliers who align with our sustainability and social responsibility values, implementing actionable measures to promote local value creation and environmental stewardship. Supporting local economies is integral to Vidrala's sustainability. By collaborating with local suppliers we foster economic growth in our regions, drive operating synergies and reduce emissions. The majority of our suppliers are local, underscoring our dedication to strengthening local economies and minimizing our environmental impact.



Our community programmes

Vidrala is committed to fostering stronger connections with the communities in which we operate. We aim to make a meaningful difference by implementing sustainable initiatives and supporting local projects that enhance the well-being of individuals and groups alike.

Sponsoring local sports teams

Vidrala understands the importance of sports as a unifying force within communities. By sponsoring local teams, we aim to encourage active lifestyles, foster teamwork, and provide opportunities for young athletes to thrive.

Crisnova Urban Ochard

Vidrala proudly inaugurated the Crisnova Urban Orchard in 2024. Located at our plant in Caudete, this innovative project is designed to promote environmental education and social integration through hands-on learning experiences and collaborative activities.

The Crisnova Urban Orchard serves as a living classroom where local schools and community associations come together to explore biodiversity, recycling, and sustainable practices. Partnerships with educational institutions such as Alcázar, Serrano, and Gloria Fuertes schools, along with local organisations including Fundación ASLA and ACAFEM, have been pivotal in making this initiative a success.

PROSPERITY: ensuring long-term competitiveness through reinvestment and sustainable growth

The Prosperity pillar underpins all of Vidrala's sustainability initiatives. By implementing efficient, sustainable practices across our operations, we strengthen Vidrala's competitiveness, allowing us to reinvest proceeds strategically and continue delivering value to our customers.

Positioned as a financially robust leader, Vidrala is in a unique position to drive transformative investments that support both our sustainability goals and our customers' evolving needs. This focus on reinvestment ensures that Vidrala can maintain its leadership in sustainable glass packaging and secure long-term success.

"Vidrala will invest, more than ever, more than any other player in the industry, with our customer in mind."

Raúl Gómez, CEO of Vidrala

4.3 PART III: Our CSRD alignment

4.3.1 Introduction

The following Consolidated Statement of Non-Financial Information and Sustainability Information complies with the requirements stipulated under the Corporate Sustainability Reporting Directive (CSRD), which is designed to enhance transparency on sustainability and ensure high-quality, comparable reporting across the European Union. This report has been prepared in line with the European Sustainability Reporting Standards (ESRS). It also addresses the priority issues identified by the Vidrala Group (referred to as Vidrala, the Group, the Company, or the Organisation) in its double materiality analysis carried out in 2024.

The Vidrala Group includes its parent company, Vidrala, S.A., headquartered in Llodio (Álava), along with its subsidiaries. The information and quantitative data presented in this report cover the period from 1 January to 31 December 2024 and pertain to the entities consolidated within the Vidrala Group's financial reporting scope, adjusted as necessary for any newly consolidated entities during this period.

This is the first year Vidrala is reporting in accordance with the CSRD and ESRS, and significant efforts have been made to map quantitative and qualitative disclosure requirements into relevant descriptions and data points for the Group, taking into account previous reports in this matter. Using public material tools, Vidrala has relied on the implementation guides published by the European Financial Reporting Advisory Group (EFRAG), particularly the "Implementation Guide 3: List of ESRS Data Points (IG-3)". The quantitative ESRS data points included in this report are identified with their corresponding ESRS ID number, as outlined in IG-3.

> This is the first year Vidrala is reporting in accordance with the Corporate Sustainability Reporting Directive (CSRD) and European Sustainability Reporting Standards (ESRS).

Only ESRS data points that have been identified as material under the double materiality assessment and those that are mandatory under the standards have been included in this report. Mandatory requirements stipulated in Law 11/2018 of 28 December 2018 on non-financial information and diversity will be referred specifically in an annex. Additionally, Vidrala follows the ESRS recommendations regarding one- and three-year phase-in periods. These data points will be progressively reported in 2025 and 2027, respectively.

All data points in the Sustainability Statement are subject to limited assurance. The quantitative data points included within the 2023 limited assurance scope are specifically marked with (n) in the ESG tables.

The index on Annex 4 provides an overview of material disclosures and their respective locations within the report. Where relevant, Vidrala has applied the principle of "Incorporation by reference" to ensure proper integration within the Management Review.

References to other EU regulations, as defined in ESRS 2 Appendix B, can be found on pages Annex 3.

At the Vidrala Group, we feel a deep-seated obligation to have a positive economic and social impact on the community, especially in places where we have a foothold and carry out our production activity.

4.3.2 Basis for preparation

Section to disclose "Basis for preparation of sustainability statement" as determined in DR "ESRS 2 BP-1 BP-2" from ESRS regulation.

The sustainability statement for the year 2024 has been prepared on a consolidated basis, encapsulating all the business units and operations under the Vidrala Group umbrella. This approach allows for a comprehensive view of our sustainability performance, fostering a cohesive strategy that aligns with our overarching corporate objectives. Due to the non-transposition of the Corporate Sustainability Reporting Directive (CSRD) into national legislation, the comparative information presented is based exclusively on KPIs that aligned with the requirements of Law 11/2018. Consequently, for certain indicators, historical data is available and will be reported in a comparative format. However, for other indicators—where prior disclosure was not mandated under Law 11/2018—comparative data may not be provided.

Consolidated Sustainability Statements

In crafting our consolidated sustainability statements, we have ensured that the scope of consolidation aligns seamlessly with that of our financial statements. This alignment facilitates a harmonised view of our financial and sustainability performances, fostering transparency and coherence in reporting.

Coverage of Value Chain

Our sustainability statement provides insights into the Vidrala Group's value chain, incorporating upstream and downstream considerations to the extent that these have been integrated into our double materiality analysis. Given the inherent complexities and information access limitations, the depth of coverage varies across different aspects of the value chain. At the Vidrala Group, we feel a deep-seated obligation to have a positive economic and social impact on the community, especially in places where we have a foothold and carry out our production activity. Looking ahead, we will continue enhancing our approach to achieve a more comprehensive assessment of the value chain, in line with the progressive adaptation period set by the European Commission. References to engagement and collaboration efforts will be detailed throughout this report.

Omission of Information

Vidrala Group has not exercised the option to omit any information related to intellectual property, know-how, or innovation results, as outlined in ESRS 1, section 7.7. All relevant disclosures have been provided in accordance with applicable reporting requirements.

Value Chain Estimation

Vidrala Group has established a system to estimate and monitor value chain data, with a strong focus on environmental KPIs, particularly those related to carbon footprint. Given the timing of this report's preparation in February 2025, some data—such as energy and emissions figures—are based on estimates due to the unavailability of final invoices. Where applicable, we will clearly indicate estimated figures in the relevant sections of this report.

Time horizons

During this reporting period, Vidrala Group implemented a refined approach to defining time horizons for its sustainability initiatives, aligned with the financial statement.

To prepare these metrics, we rely on a combination of supplier surveys and industry averages to estimate both upstream and downstream impacts. Currently, we maintain an accuracy level of ±10% for these estimations, which we aim to improve over time. As part of our continuous improvement efforts, during 2024 we launched an internal project to enhance supplier data quality, a process that will conclude in 2025 and significantly strengthen Vidrala Group's ESG data robustness.

Changes in Preparation and Presentation

This year, we embarked on a journey to enhance the clarity and usefulness of our sustainability information. The transition to a new reporting framework was driven by our commitment to providing more detailed and insightful disclosures to our stakeholders. As part of this evolution, our reporting perimeter has undergone adjustments, as mentioned in Note 1 of the Financial Statements.

We acknowledge that these changes may have an impact on certain reported indicators. Internal efforts are ongoing to fully assess the extent of these effects and ensure consistency in our reporting approach. To maintain transparency, wherever specific data points are significantly affected by this new perimeter, we will provide a brief explanation to clarify the context and ensure a meaningful comparison over time. Consequently, we remain committed to reviewing our comparative figures from 2024 onwards, reflecting these adjustments in reporting parameters and continuously improving the way we present our sustainability performance.

Throughout this document, no quantitative parameters or monetary amounts that are subject to a high degree of measurement uncertainty have been incorporated.

Disclosures Stemming from Other Legislation or Reporting Standards

In crafting this report, Vidrala Group has incorporated information from other recognised standards and legislation to provide a comprehensive view of our sustainability performance. We have referenced the requirements stipulated in Law 11/2018 of 28 December 2018 on non-financial information and diversity and the Greenhouse Gas Protocol/ 14064-1:2019 for carbon footprint reporting. These references have been integrated in an Annex for additional clarifications.

Use of Exemption for Disclosure:

Vidrala Group has not made use of the exemption provided for in Articles 19a(3) and 29a(3) of Directive 2013/34/EU, as no impending developments or matters in negotiation required non-disclosure.

Assumptions, approximations and judgements made in measurement

Throughout this Sustainability Report, any changes in how data are prepared or presented compared to previous periods are detailed in the corresponding sections, specifying both the reasons for the change and why the new information is more useful or relevant. Where these changes are driven by new CSRD/ESRS requirements, this is explicitly noted. Whenever possible, a comparison between previous and updated data is provided; if not feasible, the report clearly states why such comparison could not be made, highlighting the difference between the old and new data to clarify the impact of the change.

Additionally, any material errors identified in previous periods are disclosed in the relevant sections, along with a clear description of the error, its origin, and potential implications. Where applicable, the correction applied for each previous period is also explained. If it was not possible to implement such correction, the reason is clearly specified.

4.3.3 Governance

To ensure robust oversight of sustainability matters, Vidrala has established dedicated governance structures that integrate ESG considerations into decision-making processes. The company's sustainability strategy is overseen at the highest levels, with dedicated discussions taking place within key management bodies, including the Audit and Compliance Committee.

At the Board level, sustainability oversight is embedded within the responsibilities of the specific Sustainability Committee, ensuring a structured and strategic approach to ESG topics. These committees provide guidance on sustainability-related risks and opportunities, aligning Vidrala's long-term vision with responsible business practices. The specific mandates of this Committee, including terms of reference and board directives, explicitly outline the integration of ESG responsibilities into our governance framework. Further details on governance structures and the sustainability expertise of our leadership team can be found in the Corporate Governance section.

The company's sustainability strategy is overseen at the highest levels, with dedicated discussions taking place within key management bodies, including the Audit and Compliance Committee.

1. Composition of Administrative, Management, and Supervisory Bodies

Roles and Responsibilities:

Board of Directors

Carlos Delclaux Zulueta – Non-executive Chairman of the Board since 2002. With experience in banking and the glass industry, he has held executive positions at BBVA and various industrial and financial companies. Currently, he serves as a board member in railway sector companies and a leading European winery.

Fernando Gumuzio Iñíguez de Onzoño – Independent Director since 2019. Founder of Grupo Azora, with experience in asset management, private banking, and energy. He has held executive roles at Banco Santander and other financial and real estate companies.

Aitor Salegui Escolano – Non-executive Director since 2008, representing Addvalia Capital, S.A. With experience in logistics and operations, he was COO of DHL Iberia. Currently, he is a managing partner in renewable energy, organic food, and investment firms, as well as a director in medical technology research companies.

Eduardo Zavala Ortiz de la Torre – Non-executive Director since 2005. With experience in retail and business management, he is CEO of Workcenter and founder of several businesses. He provides a strategic vision focused on business development.

Gilllian Anne Watson – Non-executive Director with experience in finance, energy, and healthcare. CEO of Noble & Co, with previous roles at Morgan Stanley, Standard Chartered, and Endesa. She is currently the non-executive chairwoman of energy and investment firms and a director at insurance and residential care companies.

Inés Andrade Moreno – Non-executive Director with extensive experience in investment banking and asset management. Partner at Altamar CAM Partners and Chairwoman of the "Client Solutions" division. She is also a board member at Corporación Acciona Energías Renovables and Técnicas Reunidas, as well as a member of Level20, an organisation promoting women in senior positions within private equity.

Iñigo Errandonea Delclaux – Non-executive Director with a background in auditing and corporate banking. He has worked at Ernst & Young, BBVA, and Deutsche Bank, where he held global leadership roles in corporate banking, capital markets, and consumer credit.

Luis Delclaux Muller – Non-executive Director with experience in financial control, investment, and renewable energy development. Founder of Ceconat Energy in Germany and a former finance professor at various institutions.

Ramón Delclaux de la Sota – Non-executive Director and member of the Strategy Committee. With over 25 years of experience in corporate banking, capital markets, and digital transformation at BBVA.

Rita Maria de Noronha e Melo Santos Gallo – Non-executive Director representing NORONHA GALLO S.à.r.l.. Expert in marketing, with experience in audiovisual media and export. She currently manages the family holding company and works as a consultant.

Virginia Urigüen Villalba – Non-executive Director with experience in business internationalisation. She has worked at the Bilbao Chamber of Commerce and in business development consulting.

The Board's gender diversity ratio is 36% and 27% are independent Board members.

The board maintains robust sustainability competencies through several key mechanisms. These include regular consultations with an internal, permanent working group of environmental experts, ongoing engagement with external stakeholders and specialists on environmental issues, and the integration of environmental knowledge into the board nominating process. In addition, directors receive continuous training on environmental topics, industry best practices, and relevant standards such as TCFD and SBTi, ensuring that the board remains well-equipped to oversee our sustainability strategy.

At the management level, responsibilities for environmental issues are clearly defined. The Sustainability Committee integrates periodic updates to analyse environmental and social dependencies, risks, and opportunities. Moreover, the Committee develops and implements different line actions related to sustainability strategy, for example the climate transition plan; and reports quarterly to the board. Additionally, although biodiversity is not yet a current strategic priority, there are plans to address it within the next two years.

2. Sustainability matters addressed by Vidrala's administrative, management and supervisory bodies:

Throughout 2024, Vidrala's Executive Committee has been actively involved in sustainability discussions through participation in Sustainability Committee meetings, as well as dedicated sessions on specific topics regarding internal sustainability workstreams. These engagements have been instrumental in driving the double materiality assessment process, allowing the integration of expertise and sector-specific insights into the evaluation of sustainability-related risks and opportunities.

As a result, Vidrala has been able to take further action on material sustainability topics, refining existing initiatives while also defining more granular and sector-specific targets and objectives. The findings of the materiality assessment were presented and validated in the Q4 2024 Sustainability Committee meeting and subsequently reviewed and endorsed by the Audit and Compliance Committee.

Additionally, sustainability considerations are embedded within Vidrala's risk management framework, with corresponding controls and processes ensuring a structured approach to identifying, assessing, and mitigating sustainability-related risks.

From 2024 onwards, a structured set of initiatives has been planned to keep the sustainability agenda active across departments, ensuring that material topics remain an ongoing priority. Following the publication of sustainability results, an annual review of material topics will be conducted to reflect the latest regulatory developments and sustainability trends. Moreover, as outlined in the following sections, the Remuneration Committee will assess the annual performance of sustainability-related KPIs tied to incentive schemes, reinforcing the alignment between sustainability commitments and business objectives.

3. Integration of sustainability-related performance in incentive schemes

The Board of Directors has a fixed salary with no bonus based on the company's results, neither financial nor environmental. However, the Executive Committee has its 30% of the long-term incentive for the achievement of the objectives of decarbonisation, use of renewable energy and security. This bonus is reviewed by the Nominations and Remuneration Committee at least once a year.

4. Statement on Due Diligence

Vidrala is committed to strengthening its due diligence processes related to sustainability. Sustainability due diligence is currently embedded within our processes, mainly in our double materiality assessment for identifying actual and potential negative impacts on the environment and people. Other actions and practices are included under our sustainability strategy as well as in our environmental and human rights policies. These tools ensure that sustainability risks and impacts are assessed and managed in a structured manner, forming the foundation for the further development of a dedicated due diligence framework. We are actively working towards developing a more comprehensive and standardised approach, expected to be in place by 2025 and fully operational before 2027, in alignment with evolving regulatory requirements, including the Corporate Sustainability Due Diligence Directive.

We emphasise that this disclosure requirement does not establish specific obligations regarding due diligence actions. Furthermore, it does not modify or extend the responsibilities of Vidrala's administrative, management, and supervisory bodies beyond those already defined by existing legal and regulatory frameworks. Vidrala remains fully committed to adhering to all applicable laws and regulations that govern our business operations.

As set below, information is presented with cross-reference of core elements included under this report:

CORE ELEMENTS OF DUE DILIGENCE	PARAGRAPHS IN THE SUSTAINABILITY STATEMENT
a) Embedding due diligence in governance, strategy and business model	Description and key areas of our sustainability strategy (Part II) Material IROs for Vidrala (double materiality assessment process) Governance structure and sustainability responsibilities (Corporate Governance Section) Integrated Policy and Strategic Sustainability Plan (guiding principles for impact management)
b) Engaging with affected stakeholders in all key steps of the due diligence	IRO-1 - Description of the processes to identify and assess material IROs Material IROs for Vidrala (double materiality assessment process) Stakeholder engagement mechanisms (e.g., customer and supplier assessments, industry collaboration, and community engagement initiatives) Supplier Code of Conduct and responsible sourcing practices
c) Identifying and assessing adverse impacts	IRO-1 - Description of the processes to identify and assess material IROs Material IROs for Vidrala (double materiality assessment process) Climate risk and environmental impact assessments (ESRS E1) Human rights and social risk evaluations (ESRS S1-S4; ESRS G1))
d) Taking actions to address those adverse impacts	References included under each topical standard (ESRS E, S, and G) Risk mitigation measures detailed in the Strategic Sustainability Plan Specific environmental, social, and governance (ESG) initiatives aimed at reducing risks in our operations and value chain Responsible sourcing policies and supplier engagement programs Internal and external reporting mechanisms to monitor progress Third-party verification and assurance processes for sustainability disclosures
e) Tracking the effectiveness of these efforts and communicating	

5. Risk management and internal controls over sustainability reporting

Scope, main features and components

Risk assessments are integrated into the data collection process to prevent misleading information, statements, figures or conclusions based on inaccurate or incomplete data.

Risk assessment

Vidrala Group defines in its risk management system the potential impacts that their materialisation may have, considering economic, operational, reputational, or legal compliance criteria. The parameters inferred from this matrix are evaluated at all times and adapted to the evolution of Vidrala Group.

Main risks identified, mitigation strategies and related controls

For risks considered critical, there are analyses and reviews with a specific level of monitoring and decision-making, with ad-hoc procedures that specially promote their control and mitigation. These monitoring procedures include quantitative measurements of the most relevant risks in the form of economic sensitivity analysis. For risks not considered critical, the financial and sustainability department, in its periodic evaluation, and the Audit and Compliance Committee, in its review, identify potential significant changes in valuation or special weaknesses that may require greater attention or a special consideration procedure, so that monitoring can be maximised. Likewise, the economic sensitivity analysis of this evolution is one of the parameters to consider in the analysis.

The Vidrala Group is committed to protecting the environment, people and its clients.

The protection of the environment is addressed through specific initiatives that impact on the reduction of emissions, waste management and consumption of raw materials, with the increased use of recycled glass being the cornerstone of these initiatives. The Group also seeks to optimise both the type and consumption of energy sources through the modernisation of its facilities, machinery and production processes.

Occupational safety is a pillar of the Vidrala Group. This is evidenced by the implementation of management systems such as the ISO 45001:2018 standard, which helps us to review and strengthen our control environment, and which guides us in the event of an accident.

In governance, risks are identified related to insufficient development of the corporate governance model, challenges in culture and leadership, and the management of both external and internal communications.

These risks, among others, are included in the Corporate Risk Map. This Map is based on the COSO-ERM methodology and is updated periodically.

Reporting process

The management of business risks in the company involves the implementation of procedures supervised by the governing bodies, developed by the management, and executed daily in the organisation's operations. The company's management prepares the Risk Management System, which is constantly monitored by the Audit and Compliance Committee. Additionally, the board of directors periodically reviews the Risk Management System and analyses those that may be more relevant, resulting in specific policies or actions for their monitoring and mitigation of potential adverse effects.

Occupational safety is a pillar of the Vidrala Group. This is evidenced by the implementation of management systems such as the ISO 45001:2018 standard, which helps us to review and strengthen our control environment, and which guides us in the event of an accident.

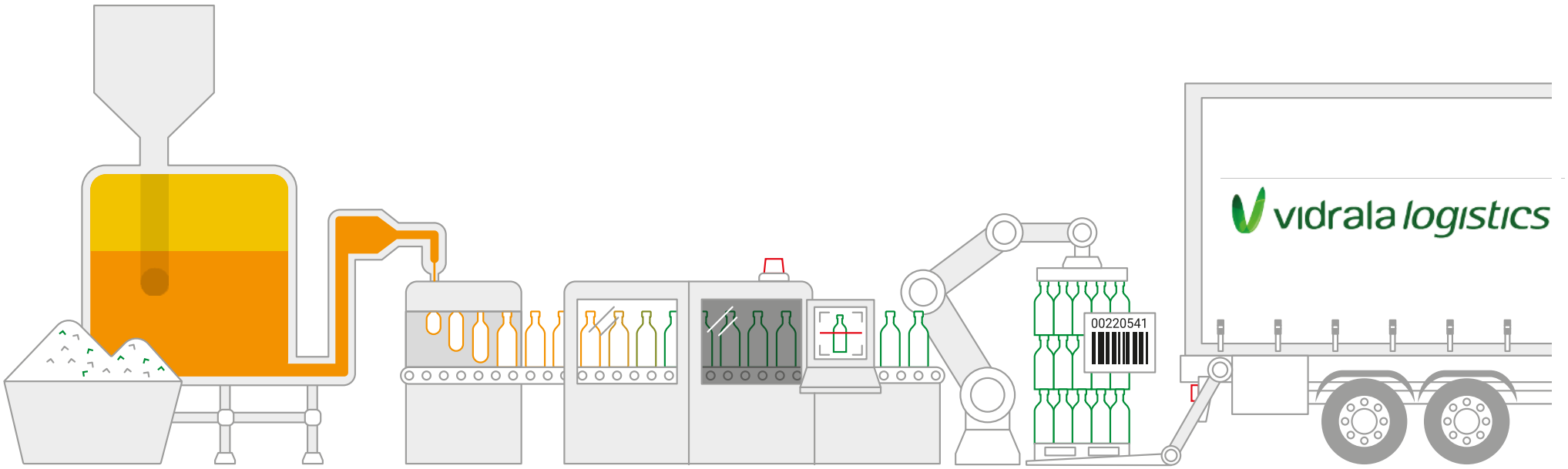
4.3.4 Strategy

1. Strategy, business model and value chain:

At Vidrala, we operate on a consolidated basis across our diverse business units, with nearly 5,000 employees working in a network of nine strategically located production centres, supplying a robust portfolio of products and services to well-known food and beverage brands, packaging specialists, and container distributors. Our consolidated revenue reaches €1,588 million euros this year. Serving significant markets primarily in Western Europe, the United Kingdom, and Brazil, Vidrala's offerings include high-quality glass bottles and jars for products such as wine, beer, spirits, water, soft drinks, and food preserves, alongside logistics and beverage filling services that comply with the most rigorous quality and environmental standards.

At the heart of our business model lies an uninterrupted industrial process that operates 24 hours a day, 365 days a year, transforming raw materials into premium glass packaging. The process begins with the precise batching of silica sand, soda ash, limestone, and recycled glass (cullet), which are then fused in high-temperature furnaces operating at approximately 1,600ºC.

At Vidrala, we have demonstrated our commitment to sustainability for years, through the publication of our first sustainability reports. Today, our approach is supported by a robust and group-wide sustainability strategy, known as Glass Made Good. The scope of this sustainability strategy covers all business units and it is presented in part II of this report.



Glass, as a material, offers exceptional environmental benefits. It is chemically inert—preserving the original flavour and quality of the products it contains—and provides an effective barrier against light and ultraviolet radiation, which is essential for protecting sensitive food and beverage products. Moreover, glass is 100% recyclable without any loss of quality, making it an ideal material for fostering a circular economy. In 2024, we advanced our sustainability strategy by increasing cullet consumption by over 53% per tonne of melted glass—an 8% improvement compared to the previous year—thereby reducing our reliance on virgin raw materials and minimizing environmental impact. Moreover, glass is produced from abundant raw materials, and its extracting is a simple and non-polluting process:

Raw Materials. The core ingredients of silica sand, soda ash, and recycled glass, are mixed into a precise batch formulation. More ingredients can be added to create different colours of glass.

Melting. The prepared batch travels along a conveyor belt to the furnace, which melts the raw materials at 1,600ºC for 24 hours. Now ready for forming, the melted glass is distributed to a forehearth, where it is conditioned and equalised into a uniform temperature.

Forming. Streams of melted glass enter a feeder and are pushed down a narrow tube by a plunger. As they emerge, mechanical shears cut them into gobs, before going to blank moulds in the forming machine to create partially shaped melted glass called 'parisons'. There are two methods of forming: the 'Press & Blow' method and 'Blow & Blow' method.

Annealing lehr. Loaded into the annealing lehr, the bottles are heated again and then cooled to room temperature, relieving internal stress and improving durability.

Quality control. Moving along to the automated inspection area, careful monitoring involves a comprehensive range of electronic, mechanical and manual checks to ensure bottles are of the highest quality, and any that don't pass the test are returned for recycling.

Packaging and expedition. All the bottles are automatically packed into pallets and wrapped hermetically so they can be delivered to customers in the best condition.

This underlines the sustainability of glass as a responsible packaging option that not only meets the needs of the industry, but also contributes to preserving the natural environment.

Recognizing that glass manufacturing is inherently energy intensive and contributes to greenhouse gas emissions, we are actively pursuing measures to enhance energy efficiency and secure new, sustainable energy sources. In alignment with international frameworks such as the Science Based Targets initiative (SBTi), we have set ambitious targets to reduce our Scope 1 and 2 emissions by 47% and our Scope 3 emissions by 28% by 2030 (relative to 2019 figures). In 2024, we achieved a 4% reduction in absolute Scope 1 and 2 emissions and a 6% decrease in emissions intensity, underscoring our ongoing efforts to mitigate our carbon footprint while maintaining operational excellence.

Vidrala's upstream value chain primarily involves sourcing raw materials such as silica sand, soda ash, limestone, and cullet (recycled glass). We collaborate closely with suppliers to ensure reliable, responsible procurement, focusing on consistent quality and reduced environmental impact. This stage also includes transportation and preliminary handling of these materials before they enter our production process.

After manufacturing, finished glass packaging is distributed to a wide range of customers—primarily in the food and beverage industries—through logistics and warehousing networks. Vidrala's downstream activities also include after-sales support, where we maintain customer relationships and encourage recycling initiatives.

Our value proposition is built on a deep understanding of our products, markets, and stakeholders. We continuously evaluate our product portfolio and market segments to ensure that our sustainability goals are met while delivering high-quality packaging solutions. Through strong partnerships with suppliers and customers who share our commitment to responsible practices, we ensure that every stage of our value chain—from raw material sourcing and production to distribution and after-sales support—contributes positively to operational performance and societal well-being.

Underpinned by a solid shareholder base, an experienced Board of Directors, and a strong Executive Team, our strategy is driven by a clear vision: to build a globally-reaching organisation where customers, employees, and suppliers are at the heart of every decision.

2. Interests and views of stakeholders

Vidrala actively engages with its key stakeholder groups through various channels and for multiple purposes. The following table outlines the nature of these engagements, how their perspectives are integrated into the assessment and what sources supported this approach.

As part of our ongoing commitment to strengthening stakeholder dialogue, we are continuously refining our approach to enhance direct interactions and better incorporate diverse perspectives into our strategic and operational framework.

Stakeholder Group	Stage of the value chain	How their perspectives are included	Sources*
Employees	•Own operations	•Conversations around sustainability embedded in departments •Surveys and workplace assessments •Employee-elected board members •Personal development dialogues	Interviews, Great place to Work survey, employee satisfaction survey, sustainability committee meetings and insights
Customers	•Downstream	•Customer support and guidance •Periodic sustainability reviews •Customer support and guidance	Sustainability reports, Internal meeting topics, tender questionnaires
Suppliers	•Upstream	•Supplier code of conduct •Questionnaires related to sustainable topics •Procurement team managers perspective •Supplier engagement events	Questionnaires to complete, Supplier procedure,
Investors	•Upstream, own operations, downstream	•ESG ratings •Investor calls, questionnaires, and emails •Periodic investor updates •Capital markets days	CDP rating, S&P rating, Sustainalytics, interviews aligned with investor relationship responsable, SASB
Governments, policymakers, and regulators	•Upstream, own operations, downstream	•Direct dialogue with policymakers •Answering public consultations •White papers, programmes, and studies	Engagement with Government Ministers, Members of the Legislative Assembly and departmental officials
Industry and sustainability associations	•Upstream, own operations, downstream	•Joint initiatives and programmes (biomethane, hydrogen mainly) •Inputs into strategic directions (Packaging and packaging waste directive) •Workshops and knowledge sharing	FEVE, ANFEVI
Local communities	•Downstream, Own operations	•Public meetings and consultations •Community and project leaders •Partnerships for community benefits	Local actions in each plan, communication and support with different iniciatives

At Vidrala we identify and analyse our stakeholders in order to understand their needs and expectations. We do this through various communication channels set up to interact with each of these groups. The identification and selection of stakeholders is based on an internal assessment carried out by our management team, as well as on the strategic relationships we have forged with these groups.

- **Employees.** Through their work they make our business plan possible. To ensure their comfort and well-being and acquire a greater commitment, at Vidrala we aim to achieve the following:
  - Motivate and inspire them towards personal growth.
  - Listen to and understand their needs and interests.
  - Encourage and stimulate, so we can continuously improve.
- **Customers.** They are our driving force, they are the 'why' of WHAT we do and HOW we do it. At Vidrala we:
  - Develop long-term relationships by meeting their needs and seeking their satisfaction.
  - Deliver sustainable packaging results.
  - Provide an adequate and quality service, at a competitive cost.
- **Suppliers.** They are the part of the supply chain of goods and services that contribute to our business activity. To this end, the following are essential ingredients:
  - Label them as a key player in the organisation.
  - Hold conversations with confidence, clarity and openness.
  - Set ourselves a "win-win" and long-term position.
  - Generate strategic pacts and competitive advantages.
- **Community.** Relevant factor in economic growth linked to sustainable development. In this area, Vidrala has set itself the following goals:
  - Commitment and obligations to the circular economy
  - Generate excellent, permanent and long-lasting employment.
  - Boost the regional economy (local suppliers).
  - Undertake partnership or sponsorship actions.
- **Shareholders.** They are those who believe in the effectiveness and operability of the business project, committing their capital. To make it work at Vidrala:
  - We generate value, through sustained cash production and clear prioritisation of cash allocation.
  - We counterbalance the risk generated in the investment with an attractive return.
  - Constant updating of shareholders and investors on the status and progress of the project and business, both in terms of performance and expected risks.

In terms of communication with our stakeholders, we have numerous communication channels that allow us to maintain a continuous dialogue, enabling us to learn about their needs and concerns, and fostering transparency and collaboration. For our employees, we emphasise two-way communication, informative meetings adapted to their needs, union meetings, internal communication committees and multidisciplinary work teams associated with internal projects. Similarly, for our customers, we use a variety of channels, such as regular mail and online forms, to ensure effective communication. We also offer a specific supplier portal, accessible from our website, which facilitates transparent and collaborative interaction. Our community also has dedicated communication channels, including the availability of regular public financial information and the holding of the Annual General Meeting of Shareholders (AGM). To maintain close and transparent communication with our shareholders, we provide various channels, such as the Investor Relations department, and the website of the Spanish Securities and Exchange Commission (CNMV - Comisión Nacional del Mercado de Valores), among others.

In addition to the specific channels for each stakeholder group, we have common means of communication, such as telephone, email, social media and our corporate website, which facilitate access to relevant information and promote interaction between all stakeholders.

4.3.5 Material impacts, risks and opportunities and their interaction with strategy and business model

Our identified material IROs are outlined in the DMA (see Annex 4.4.1) process and further described under each topic reported on in this report.

At Vidrala, our strategy and business model are designed for resilience, enabling us to effectively manage material impacts and risks while capturing emerging opportunities. We continuously invest in advanced, energy-efficient technologies and diversify our supply chain with a strong focus on sustainability. Our robust risk management systems, aligned with ISO standards and science-based targets, allow us to proactively mitigate both physical and transitional risks. Additionally, our ongoing supplier and customer collaborations ensure that our value chain remains adaptive. A culture of innovation and continuous improvement drives our commitment to sustainable principles, reducing environmental impact and ensuring long-term operational and financial stability. Regular reviews ensure our approach remains responsive to market changes and stakeholder expectations.

Vidrala remains alert to potential catastrophic events and regulatory changes. Likewise, the identified opportunities, such as adopting circular economy solutions and technological improvements, aim to enhance competitiveness and long-term value creation. Overall, Vidrala integrates these material risks and opportunities into its business model, addressing operational challenges and reaffirming its commitment to sustainability throughout its own operations and value chain. Further details related to current and anticipated financial effects will be disclosured in 2025, as we are will determine quantitative thresholds. Qualitative thresholds for financial materiality are included in Section Double Materiality.

As a result of our continued CSRD implementation following 2023's part pre-aligment with agnostic material topics, the DMA 2024 provided us a higher level of granularity in the identified IROs. The material topics described in the FY23 sustainability statement have been assessed at a more detailed level in this report, considering sub and sub-sub-topics per CSRD requirements.

4.3.6 Impact, risk and opportunity management

1. Vidrala on Sustainability

At Vidrala, sustainability is at the core of our mission and operations. Sustainability is about meeting our needs today without compromising the ability of future generations to meet theirs. It involves making decisions and taking actions that protect our environment, enhance social well-being, and ensure economic viability. For Vidrala, this means producing glass packaging that is environmentally friendly while preserving our distinctive competitiveness.

For us, sustainability is synonymous with balance. The search for equilibrium is crucial – balancing environmental concerns, societal needs, and business imperatives. Our sustainability efforts revolve around maintaining this balance, which evolves continuously.

Our challenge lies in achieving this critical balance, particularly in areas like our core operations and energy transition. It's about adapting to changes and ensuring long-term viability without compromising on our sustainability commitments.

This means focusing on key topics such as recycling and reuse initiatives, energy transition strategies, and advancing our glass fusion technologies. While we will eventually reach the technologies and processes of the future, at Vidrala, we firmly believe that it is our people who will always make the difference

People are at the heart of our sustainability journey. Initiatives like EDI (Equity, Diversity, and Inclusion) and the work of WIM (Women in Manufacturing) highlight our commitment to creating a diverse and inclusive workplace. Attracting talent to a traditionally tough industry requires us to offer more than competitive wages; it involves fostering a culture of innovation and respect core to our employee experience.

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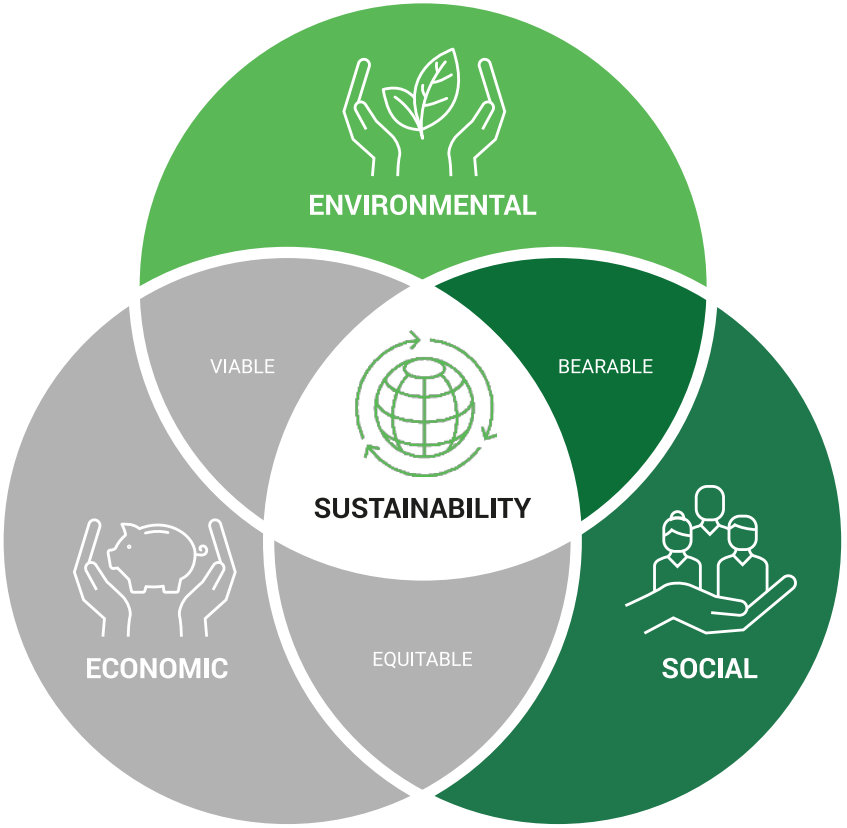
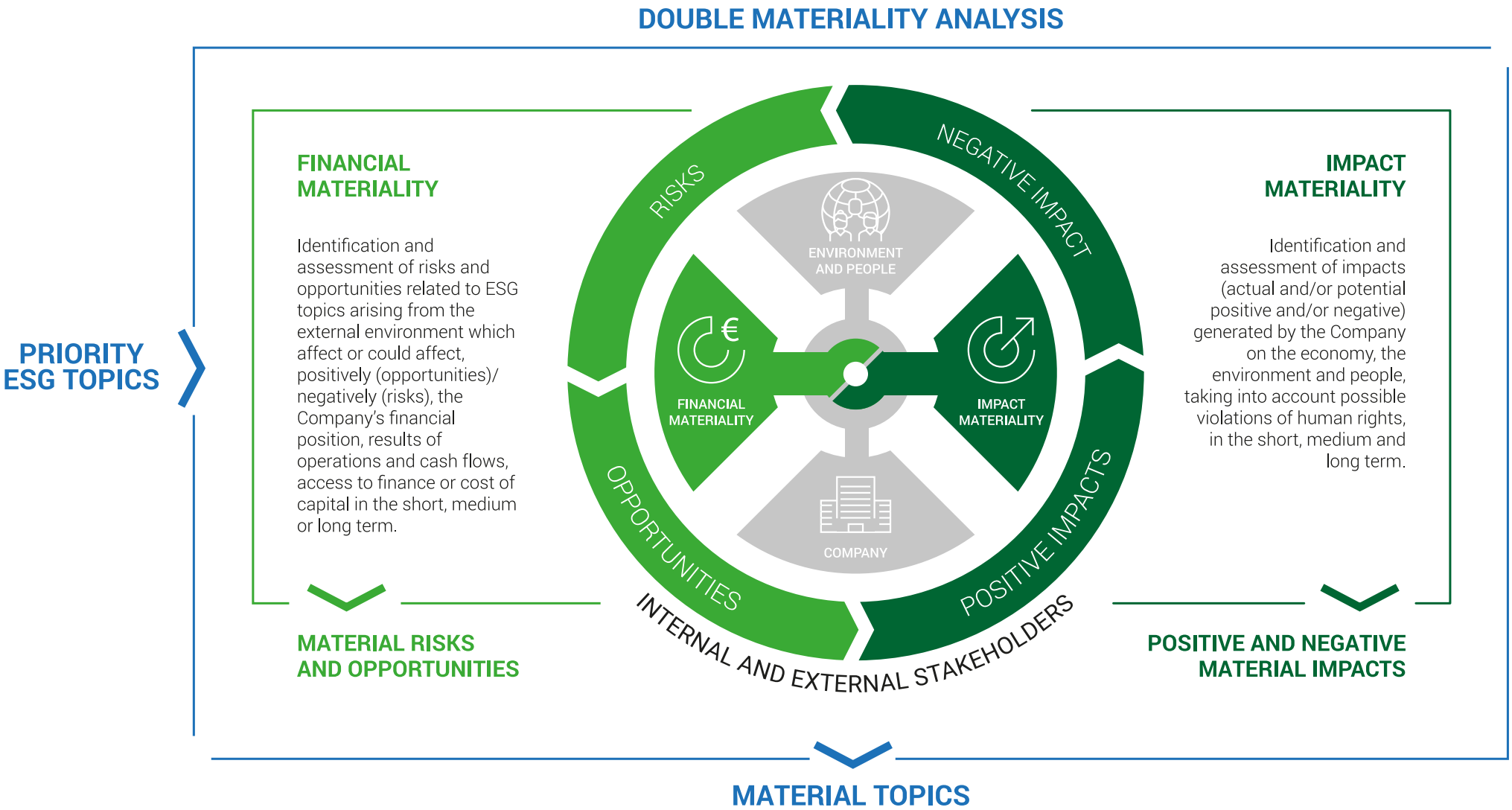


Double materiality assessment



Carrying out a double materiality assessment is a key process for **aligning with CSRD** compliance and ensuring sustainable growth.

This exercise, conducted by Vidrala Group from May 2024 to September 2024, helps to **identify** how the company's operations impact people and the environment, while also considering how **external factors**, such as climate change, affect the financial value of the company.

This dual perspective of impact materiality and financial materiality forms the basis of the 'double' materiality approach.

Vidrala Group understands that **this process is not static**; instead, it requires continuous **updates** in response to evolving ***market conditions, regulatory frameworks***, and the ***internal operations*** of the company. As such, the group is committed to periodic reviews of materiality to stay aligned with sustainability goals and broader industry standards.

Vidrala's double materiality assessment methodology is based on the principles set out in the ESRS, in particular in Section *3. Double materiality as the basis for sustainability reporting and Appendix E. Flowchart for determining the information to be included* in ESRS 1 as well as in the IG 1 Materiality Assessment developed by EFRAG.

Perimeter

The double materiality process covers all of the Vidrala Group's business units, in accordance with financial consolidation, as well as the relevant stages of its value chain and business relationships. The parts of the process that involve the value chain are explicitly indicated in this methodology.

Materiality assessment process

The process, based on the principles contained in the ESRS, consists of the following stages:

Understanding the context and establishing evaluation parameters

The objective of this first phase is to develop a deep understanding of the context in which the company operates and to establish the parameters that will guide the assessment of impacts, risks and opportunities (IROs) to determine whether they are material. This process ensures that the identification and assessment of impacts and dependencies are carried out based on reliable information and aligned with regulatory frameworks and stakeholder expectations.

Analysis of the Operational and Strategic Context

The Sustainability Department assesses external trends (including regulatory developments, industry trends, and stakeholder expectations) and internal trends (corporate strategy, policies, and objectives) that shape the company's operating environment. This analysis ensures that sustainability considerations are fully integrated into Vidrala's strategic approach and align with both legal requirements and business priorities.

Value Chain Mapping

A comprehensive mapping of the main business lines' value chain is conducted, covering all stages from suppliers to clients. Despite our efforts, we are conscious that there is room for improvement regarding the value chain analysis. During the following years, we will work towards its development. This process identifies key activities, resources used, and involved stakeholders, allowing for the recognition of critical points where significant environmental, social, or economic impacts occur, as well as areas of key dependencies. This mapping serves as a foundation for assessing impacts, risks and opportunities across Vidrala's operations.

Identification of Information Sources

Internal and external sources of information are compiled and systematically organised to support the materiality assessment. These include:

- Internal: corporate policies, operational databases, risk assessments, and sustainability performance indicators.
- External: applicable regulations, international reporting standards (ESRS, GRI, SASB), and industry research.

This process ensures a robust and reliable data framework for subsequent assessment stages.

Determination and Engagement of Key Stakeholders

Key internal and external stakeholders are identified based on their relevance to sustainability matters and their influence on or exposure to Vidrala's impacts, risks, and opportunities. This step involves determining engagement mechanisms (e.g., surveys, interviews, workshops) or leveraging existing consultation channels to capture their perspectives. The findings of this stakeholder engagement process are detailed in section SBM-3 in this report.

Establishing Evaluation Parameters

The criteria and metrics that will guide the double materiality assessment are defined, ensuring alignment with evolving regulatory frameworks and best practices. This includes:

- Impact materiality: Magnitude, scope, and irreversibility of sustainability impacts.
- Financial materiality: Probability and financial magnitude of risks and opportunities.

For financial materiality, the methodology is integrated with Vidrala's corporate risk management framework, aligning with the COSO methodology to ensure consistency with broader enterprise risk management practices. Thresholds and assessment criteria are established to ensure transparency and consistency in determining material sustainability topics.

Identification of potential impacts, dependencies, risks and opportunities

The objective of this phase is to gather detailed information to obtain a first list of the possible positive and negative impacts generated by the company, the critical dependencies on natural resources or ecosystem services, the risks associated with internal and external factors, and the opportunities that may arise in the operational or strategic context.

Impact Analysis

Building on the list of issues identified in AR 16 of ESRS 2 (Annex 2), combined with previous years' analyses and additional topics deemed relevant by the Sustainability Department and sources analysed during the context mapping phase, a classification of potential impacts will be established. These will be categorised as current or potential, negative or positive, and short-, medium-, or long-term impacts. A distinction will be made between impacts occurring within Vidrala's own operations and those within the value chain, including: upstream impacts (related to suppliers) and downstream impacts (related to customers)

To the greatest extent possible, impacts will be identified at the most specific level (topic, subtopic, and sub-subtopic). Where further granularity is not possible, reference will be made to broader subtopics that encompass multiple issues.

Risk and Opportunity Analysis

Using Vidrala's corporate risk map, potential sustainability-related risks will be identified. Additionally, previously established sources will be leveraged to recognise emerging risks and opportunities that may be relevant. The finding mentioned in section 3.1.4 Determination

and Engagement of Key Stakeholders will guide this process to ensure consistency and alignment with regulatory and business priorities.

Review of the Relationship Between IROs

The identified impacts will be reviewed to determine whether they could lead to specific risks or opportunities. Likewise, any identified risks and opportunities will be assessed to understand whether their management could, in turn, generate new sustainability impacts.

Validation with Business Units and Departments

The 2024 DMA assessment has been validated by the sustainability committee (including members of the Executive Board). From now on, the list of impacts, risks, and opportunities (IROs) will be validated through biannual workshops with key internal areas and business units. These sessions will serve to ensure completeness and comprehensiveness of identified IROs and adapt the IROs to Vidrala's specific operational and strategic context.

Departments involved in the validation process include: People, Operations, Purchasing, Finance, Internal Audit.

The list of identified impacts will specifically highlight those related to Human Rights, ensuring compliance with internationally recognised frameworks. Particular attention will be given to impacts concerning: Child or forced labour, Equal remuneration, Freedom of association, Fair working conditions and wages, Inclusion of vulnerable or minority groups and Limitations on excessive working hours

This structured approach aims to integrate human rights considerations into Vidrala's broader sustainability and risk assessment framework, reinforcing the company's commitment to responsible and ethical business practices.

Assessing the materiality of impacts, risks and opportunities

Materiality assessment is the process that allows determining which IROs identified in previous stages are most relevant to the organisation and its stakeholders. This step aims to prioritise the issues that must be strategically managed and reported, considering both the perspective of impact on the environment (impact materiality) and the financial and strategic perspective (financial materiality).

Impact Assessment

- Current impacts will be assessed in accordance with ESRS 1, based on their severity, which is determined by magnitude, scope, and, if negative, irremediability. Potential impacts will be evaluated based on their severity and probability of occurrence. The assessment criteria, rated on a scale from 1 to 5, will be detailed in Annex Double Materiality Parameters.

- Evaluators and Stakeholder Participation

Each department or function will evaluate the relevant impacts and associated parameters, based on prior identification processes and their direct connection to the identified impacts. The Sustainability Department will determine the scope of the impacts based on the finding during meetings and internal conversations, unless a justified weighting adjustment is necessary.

Impact Score

Each identified impact is assessed based on three key dimensions:

- Scale: The extent of the impact, measured on a 0 to 5 scale.

- Scope: The breadth of the impact, also measured on a 0 to 5 scale.

- Remediability (for negative impacts only): The degree to which an impact can be reversed or mitigated, measured on a 0 to 5 scale.

For potential impacts, an additional factor is introduced:

- Likelihood: The probability of the impact occurring, expressed as a numerical factor ranging from 0 to 1.

For positive impacts, scores are normalised on a 15-point scale to ensure comparability with negative impacts, following the formula: (Scale+Scope)/10×15. Additionally, no netting of impacts is applied—if a subtopic generates both positive and negative impacts, only the most significant impact is considered for assessment.

Once scores are calculated, impacts are classified into categories based on their materiality threshold:

Score	Materiality classification
>12	Critical
10-12	Significant
8-10	Important
5-8	Informative
<5	Minimal

Topics scoring above 8 are considered material, requiring further integration into risk management and strategic decision-making processes.

The methodology differentiates between actual and potential impacts, as well as positive and negative impacts:

- Negative Actual Impacts: Evaluated based on scale, scope, and remediability.
- Negative Potential Impacts: Evaluated based on scale, scope, remediability, and likelihood.
- Positive Actual Impacts: Evaluated based on scale and scope.
- Positive Potential Impacts: Evaluated based on scale, scope, and likelihood.

For negative human rights-related impacts, severity is prioritised over probability, ensuring greater weight is assigned to the severity of these impacts in the assessment.

Financial Score

Risks and opportunities will be assessed in accordance with ESRS 1 based on their magnitude and likelihood of occurrence. The likelihood of occurrence (expressed as a percentage between 0% and 100%) is multiplied by the potential financial size of the impact (also expressed as a percentage between 0% and 100%). A topic is considered financially material if the resulting score exceeds 50%. This methodology ensures that financial risks and opportunities are systematically identified, prioritised, and integrated into strategic decision-making. For further details related to internal scales, please refer to Annex Double Materiality Parameters.

Results Consolidation

The Sustainability Department will compile the list of relevant IROs, selecting those that exceed the materiality threshold. IROs close to the threshold will be reviewed to ensure that no significant IROs are excluded. A semi-annual review of the scores will be conducted.

Validation with Senior Management

The list of relevant IROs will be reviewed with the Board and the Sustainability Committee. If necessary, the results will also be presented to the Audit and Compliance Committee for further discussion.

Reporting sustainability information on material impacts, risks and opportunities.

Sustainability information reporting is the final step in the dual materiality process and aims to identify the information that must be communicated in a transparent, structured and announced manner with regulatory standards on the material issues identified and managed by the organisation.

Mapping Material IROs to Materiality Issues

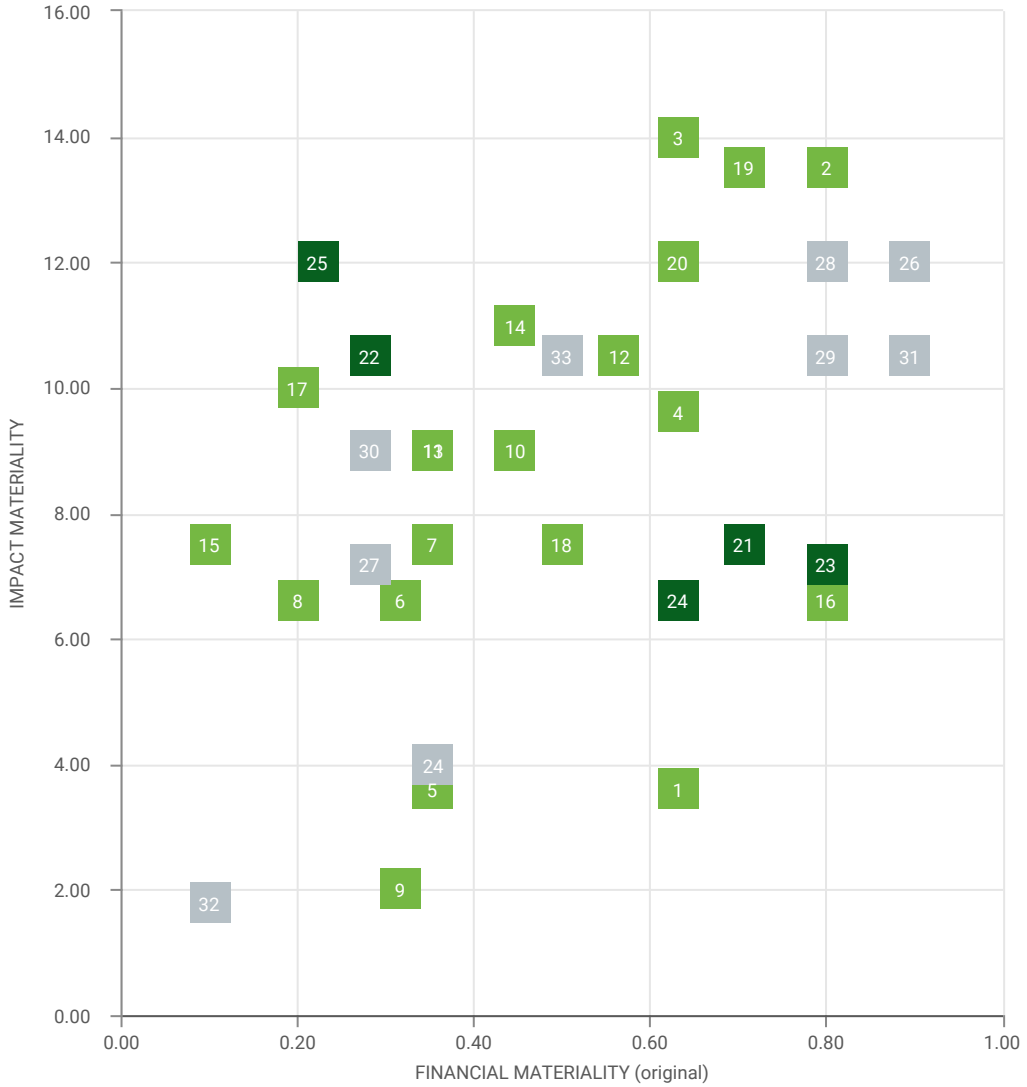
During the identification stage, each Impact, Risk, and Opportunity (IRO) will be linked to a relevant sustainability issue. If an IRO is classified as material, the associated sustainability issue will also be considered material at its most specific level. This process will result in a list of material IROs and sustainability issues, which will be mapped to the corresponding Disclosure Requirements (DRs) of the ESRS.

DR Identification and Data Points for Reporting

Following the principles of information materiality outlined in ESRS 1 (sections 31-35), the relevance of ESRS disclosures will be assessed in relation to the importance of the sustainability issue and its usefulness for stakeholders' decision-making. This assessment will be conducted at the data point level to ensure that the reported information aligns with materiality principles.

2. Index of material disclosures- Environment

Double Materiality Matrix



1	E1-Climate Change Climate change adaptation
2	E1-Climate Change Climate change mitigation
3	E1-Climate Change Energy
4	E2-Pollution Pollution of air
5	E2-Pollution Pollution of living organisms and food resources
6	E2-Pollution Pollution of soil
7	E2-Pollution Pollution of water
8	E2-Pollution Substances of concern
9	E2-Pollution Substances of very high concern
10	E3-Water Water consumption
11	E3-Water Water discharges in water bodies and in the oceans
12	E3-Water Water Use
13	E3-Water Water withdrawals
14	E4-Biodiversity Direct impact drivers of biodiversity loss
15	E4-Biodiversity Impacts and dependencies on ecosystem services
16	E4-Biodiversity Impacts on the extent and condition of ecosystems
17	E4-Biodiversity Impacts on the state of species
18	E5-Circular economy Resource outflows related to products and services
19	E5-Circular economy Resources inflows, including resource use
20	E5-Circular economy Waste
21	G1-Business Conduct Corporate culture
22	G1-Business Conduct Corruption and bribery
23	G1-Business Conduct Management of relationships with suppliers including payment practices
24	G1-Business Conduct Political engagement and lobbying activities
25	G1-Business Conduct Protection of whistle-blowers
26	S1-Own Workforce Equal treatment and opportunities for all
27	S1-Own Workforce Other work-related rights
28	S1-Own Workforce Working conditions
29	S2-Workers in the value chain S2 - Equal treatment and opportunities for all
30	S2-Workers in the value chain S2 - Other work-related rights
31	S2-Workers in the value chain S2 - Working conditions
32	S2-Workers in the value chain S2- Other work
33	S4-Consumers and end-users Information-related impacts for consumers and/or end-users
34	S4-Consumers and end-users Personal safety of consumers and/or end-users

4.3.7 Role of the administrative, management and supervisory bodies

Section to disclose "The role of the administrative, management and supervisory bodies" as determined in DR "G1-ESRS 2 GOV-1/ ESRS G1-ESRS 2 GOV-1-5" from ESRS regulation.

At Vidrala, we adhere to a strong commitment towards maintaining a transparent, responsible, and ethical operational framework. Our administrative, management, and supervisory bodies play a pivotal role in shaping the conduct of our business, fostering a culture of sustainable growth and adherence to the highest standards of business ethics. Herein, we disclose pertinent details pertaining to the role and expertise of these bodies in matters of business conduct.

The role of the administrative, management, and supervisory bodies related to business conduct

We recognise the importance of leadership, strong corporate governance and high standards of transparency as cornerstones to achieve our goals.

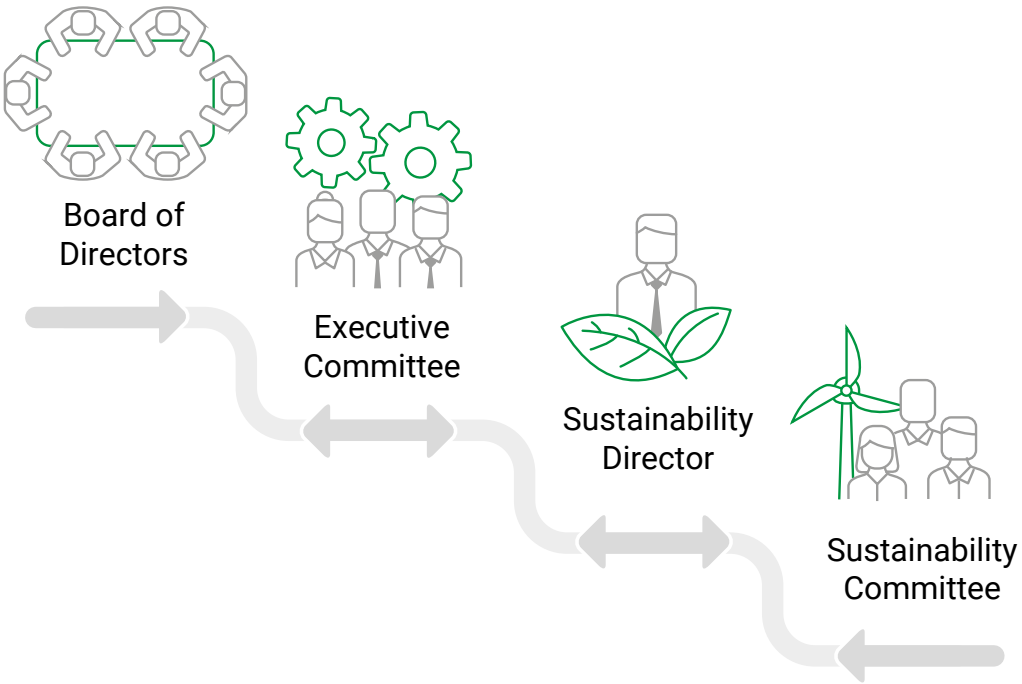
In this context, to ensure responsible leadership and transparency, appropriate governance needs to be implemented across our business, markets, and the wider community. **Responsible leadership** is key to ensuring the businesses long-term success for both ourselves, and our stakeholders.

Our key principles include:

- **Governance and responsibility of our 4Ps (People, Place, Planet and Prosperity)** business strategy being shared and championed throughout the business.
- Striving to be a **leader in sustainability,** looking to partner across our industry business sector, and the wider business community to **influence best practice, and innovation.**
- Providing **transparent internal and external disclosures** on our sustainability strategy to ensure transparency with stakeholders. In 2024, The Group responded to the **Carbon Disclosure Project** (CDP) on climate change and water security, achieving scores of 'B' and 'B', respectively.
- Ensuring our business has **robust checks and balances across the whole business.** This includes remuneration, Board composition, accountability oversight, and payment of the fair amount of taxes in all geographies that we operate.
- Recognising the **impact our business has on climate change**, as well as the **impact climate change could have on The Group**. The Group assessed this by identifying, assessing impact, and ensuring the embedment of climate-related risks into the Group's risk enterprise framework.

In this context, our governance is led by a **Board of Directors composed of 11 non-executive members**. The Board's diversity and experience is supported on an efficient structure that ensures it works in an effective manner that is transparent and accountable, whilst promoting a culture of openness and participation to aid the decision-making process.

Our sustainability strategy is endorsed at the Group level in accordance with the following governance framework:



Our Executive Committee advises on our 4Ps sustainability strategy, monitors progress against this strategy and is responsible for the overarching approval of the strategy. The Group's top climate-related risks and opportunities are reported to the Board through its delegated Audit Committee at least annually to ensure that they have oversight of the potential impact, as well as the mitigation and control measures being taken to reduce the climate-related impact.

Climate risk as a part of Executive Committee Remuneration

The Executive Committee is ultimately accountable for performance against the Group's sustainability targets and goals, including our newly SBTi validated targets. Thus, the new executive compensation scheme links 30% of the long-term incentive to the achievement of decarbonisation, use of renewable energy and safety targets.

Our sustainability governance framework now comprises two key working groups. Firstly, the Sustainability Committee—outlined in Part II of our strategy—brings together members from the Executive Committee alongside representatives from functional areas such as Human Resources, Health and Safety, Environment, Finance, Procurement, Technical, and Communications & Marketing. This committee is tasked with monitoring progress against our objectives and proposing new actions in sustainability. It focuses on topics that are of significant concern to the organisation and, in the short term, will be responsible for evaluating our progress against targets and recommending further initiatives, with the same departments remaining actively involved.

Additionally, in 2024 we launched a new working group dedicated to analysing the EU taxonomy and overseeing our capital expenditure (CAPEX). This group is focused on one of our principal challenges: ensuring that our CAPEX is aligned with the EU sustainability criteria. It evaluates investment proposals, identifies associated risks and opportunities, and provides recommendations to optimise our sustainable investment strategies.

The **Sustainability Director** is responsible for the **day-to-day strategy building, goal setting, execution, and progress of all 4Ps related performance metrics**. The Sustainability Director also has management responsibility for climate-related issues, including sustainability initiatives, targets, and disclosure of emissions annually. Our Human Resources (HR), Health and Safety Executive (HSE) and Environmental teams bring a broad spectrum of experience to ensuring our sustainability strategy is fit for the future, and further support us in the achievement of our 4Ps targets. This joined up approach helps to ensure our 4Ps strategy is integrated to all areas of the business.

The expertise of the administrative, management, and supervisory bodies on business conduct matters

The Board is ultimately accountable for performance against the Group's sustainability targets and goals and is led by our non-executive chairman, separate from our Chief Executive Officer, to ensure the separation of powers between the two roles. We seek not only the necessary expertise, but also the independence that balances decision-making.

There are three Board committees:

- **Audit and Compliance Committee** is responsible for supervising the effectiveness of internal control, risk management systems, the process of preparing and presenting financial information and the relationship with the external auditor.
- **Nomination and Remuneration Committee** is responsible for evaluating the necessary competencies in the Board of Directors, reporting on proposals for the appointment of directors and senior managers, defining their remuneration policy and examining succession plans.
- **Strategy and Development Committee** is responsible for assessing strategic initiatives, such as potential investments, divestitures or growth opportunities.

Both the Audit and Compliance Committee and the Nomination and Remuneration Committee are presided by an independent director.

Our intention is to continue making progress, with the aim of becoming more modern and better aligned with the highest standards of corporate governance which includes an ongoing process towards the incorporation of more women and independent members.

We also have a robust **Executive Committee** of highly skilled and committed professionals, responsible for guiding strategic decision making and supervising the implementation of the sustainability strategy.

4.3.8 Impacts, risks and opportunities

1. Processes to identify and assess material Impacts, Risks and Opportunities:

Section to disclose "Description of the processes to identify and assess material IRO" as determined in DR "G1-ESRS 2 IRO-1" from ESRS regulation*

At Vidrala, we are committed to an inclusive and comprehensive approach towards identifying and assessing material impacts, risks, and opportunities which influence our business conduct and operations. We acknowledge the necessity of a robust system that duly considers varying criteria including location, activity, sector, and the transaction structure.

Please, refer to Material IROs for Vidrala Group section for more detail for the process to identify and assess material IROs related to Business Conduct.

2. Business Conduct Policies and Corporate Culture

Section to disclose "Business conduct policies and corporate culture" as determined in DR "G1-1" from ESRS regulation*

At Vidrala, we are deeply committed to fostering a corporate culture that is anchored in transparency, integrity, and ethical business practices. We have policies related with the identification, management, and remediation of our material impacts, risks, and opportunities related to business conduct matters.

These policies are embedded in our corporate culture, promoting responsible behaviour at every level of the organisation. We encourage the continuous development and evaluation of our corporate culture through periodic reviews, employee training, and stakeholder engagements.

a. Code of Conduct

Vidrala prioritises responsible business aligned with its core values, formalised through the Vidrala Group's Code of Business Conduct. This annually updated document incorporates legal developments and serves as a guide for decision-making and staff conduct. Supporting policies include those against corruption, fraud, and antitrust violations, alongside human rights and criminal compliance frameworks.

b. Anti-Corruption, Anti-Bribery and Anti-Fraud Policy

Vidrala upholds a zero-tolerance stance on corruption, bribery and fraud, ensuring transparency and adherence to ethical principles. Employees must report suspected violations via established channels, supported by compliance training. Interactions with public authorities adhere strictly to legal and ethical standards.

c. Whistleblowing Channel

A secure whistleblowing system ensures confidentiality and anonymity, enabling reports on breaches or misconduct. This channel is available in the corporate website, is open to both internal and external people and it's policy is published in the own channel. Vidrala strictly adheres to the laws transposing Directive (EU) 2019/1937, safeguarding our employees who are whistleblowers from any form of retaliation.

d. Human Rights Commitment

Vidrala's Human Rights Policy prohibits child labour, forced labour, and exploitation while promoting fair wages, safe working conditions, and the right to unionise. Supplier and operational audits ensure compliance with ethical standards, reinforced by membership in initiatives like SEDEX.

e. Responsible Supply Chain

Vidrala requires suppliers to adhere to its ethical standards through a Supplier Code of Conduct integrated into contracts. Sustainability audits, self-assessments, and access to facilities ensure ongoing compliance, with corrective actions enforced for violations.

(*ESRS G1-1-7)

3. Management of relationships with suppliers:

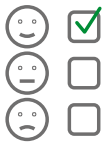
Section to disclose "Management of relationships with suppliers" as determined in DR "G1-2" from ESRS regulation*.

At Vidrala, we ensure that each of the parties in our supply chain meets and shares minimum ethical and behavioral standards aligned with the Group's values, so as to secure safe working conditions, high ethical standards and environmentally responsible and respectful processes.

To guarantee this purpose, we have, in addition to our own Code of Conduct, a Supplier Code of Conduct with Group-wide scope. Therefore, when concluding any new commercial agreement with each of the business units, the other contractual party must tacitly accept this Code. In addition, they must commit to promoting these principles in the same way in their own supply chains. This Supplier Code of Conduct is permanently available and accessible on our site.

In view of the specific context of the Vidrala Group, each business unit has a portfolio of historical suppliers whose collaboration agreements were closed at the time without addressing sustainability requirements. For these cases, we have adapted the audit requirements on these suppliers by including sustainability indicators within this scope (addressing considerations such as social responsibility, human and labour rights, non-discrimination and women's rights and hiring of minors, among others) in the questionnaires. Furthermore, it is important to note that as part of the continuous improvement process of our sustainability strategy, we plan to integrate these requirements in our Human Rights Policy and in our Risk Matrix in the future.

Against this backdrop, audits are carried out on a biennial or triennial basis, depending on the criticality associated with each supplier within the business, as set out in the Integrated Management System for supplier quality assurance and management. Within this management system we distinguish the following processes.



1

A selection process is initiated which includes a document-based review and assessment. The results of this initial review, together with any additional standards of regulations which the supplier must abide by, will determine the need for a secondary audit.

2

Secondary audits are conducted by a multidisciplinary team, following a procedure to assess compliance with our minimum supply chain standards.

3

After supplier selection, we evaluate them on a quarterly basis.

4

Any non-compliance is investigated to assess the severity and determine possible corrective actions required.

5

Our supplier improvement multidisciplinary team also conducts mid-year reviews in order to detect significant problems before they occur.

Within the Glass Made Good strategy, we are working to increase the criticality and sustainability requirements for suppliers and subcontractors in the near future. Although we expect suppliers to self-assess and demonstrate their compliance with the Code, we have an audit procedure in place to mitigate potential risks of non-compliance, for which each supplier must provide us full access to their facilities, documents and records for the purpose of carrying out such audits.

Likewise, with regard to the channels available for suppliers to report possible breaches of the agreements established, Vidrala has a public Whistleblowing Channel available in our corporate website for immediately reporting any actual or potential breach of the Code. We guarantee suppliers must not permit any retaliation against any individual who seeks advice or reports a violation or potential violation to the Vidrala Group. Once we detect a breach through any of the available channels, we assess the case and business relationship and may take corrective action in accordance with the terms of the contract. These actions will depend on the seriousness of the violation and may include formal warnings or immediate termination of contracts, without any possibility of appeal and without prejudice to any legal action Vidrala may take against the supplier.

In 2024, we carried out 33 supplier audits (compared to 35 in 2023) of which 100% were satisfactory.

(*ESRS G1-2-12)

4. Prevention and Detection of corruption or bribery:

Section to disclose "Prevention and detection of corruption and bribery" as determined in DR "G1-3" from ESRS regulation*.

We do not tolerate any violations of our anti-corruption, anti-bribery and ethical policies and we are committed to addressing any incidents that do. Our Anti-Corruption, Anti-Bribery and Anti-Trust Policy, approved in 2020, sets out the applicable regulations, to whom the policy applies, the basic general principles and the channel to communicate suspicions regarding or clear violations of the policy. We ensure that all our employees are trained on these matters. Our Code of Conduct is conveyed to all new employees and is available via the corporate intranet. It is also regularly sent to current employees by email.

Our Anti-Corruption, Anti-Bribery and Anti-Trust Policy also addresses the issue of anti-competitive behavior. Once again, there were no infringements recorded or legal action brought in respect of anti-competitive behavior or violations this year.

Vidrala has a software that identifies any suspicious behaviour involving purchases and payments in order to minimise potential risks in this area. As part of the internal audit plan, and using this software, a continuous audit is carried out that involves the purchasing, invoicing and treasury processes to detect possible fraud and process improvements as well as an annual risk assessment to identify areas of high risk for corruption and bribery, focusing on geographic regions, high-value transactions, and areas with elevated risk levels.

Our Anti-Corruption, Anti-Bribery and Anti-Trust Policy also addresses the issue of anti-competitive behaviour. Once again, there were no infringements recorded or legal action brought in respect of anti-competitive behaviour or violations this year.

In 2024, the Vidrala Group continued to use the Whistleblowing Channel it created in 2022, in compliance with current legislation in this regard set out in European Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and its transposition into the legislation of the countries in which the Vidrala Group operates. Its aim is to ensure confidentiality around the complaint, thereby guaranteeing anonymity. This Whistleblowing Channel and its management policy can be consulted at:

https://vidralawhistleblowing.integrityline.com/forntpage

Prevention and Detection Procedures

Vidrala has established a comprehensive framework to prevent and tackle corruption and bribery issues, which encompasses:

- An outlined policy describing the various forms of corruption and bribery, explicitly detailing the consequences of involvement.
- Periodic risk evaluations to detect and address potential corruption and bribery risks.
- Anonymous reporting channels through which employees and stakeholders can report suspicions or allegations of corruption and bribery securely and without fear of reprisal.

Our Audit and Compliance Committee, as a delegated body of the Board of Directors, operates independently and is tasked with identifying, preventing, obstructing, and reporting any operations involving criminal acts or fraud within the company's business activities. This ensures impartiality and effective oversight in addressing potential risks.

After completing an investigation, the findings are communicated to the appropriate administrative, management, and supervisory bodies, who take the required actions based on the conclusions and recommendations. Comprehensive reports are kept on record to guide future policy decisions.We constantly review these policies to ensure their effectiveness and to incorporate best practices as they evolve.

To ensure the accessibility and understanding of our policies, we employ various mediums such as:

- Onboarding training to inform all employees.
- Online resources and training modules accessible to all employees.
- References included in Supplier Code of Conduct

Through these channels, we aim to make all relevant stakeholders well-informed about our policies and their implications.

Training Programs

Our training programs are comprehensive, covering various aspects including the identification of corruption and bribery, reporting mechanisms, and preventive measures. These programs are mandatory for all employees, with special modules designed for functions identified as higher risk.

To ensure robust compliance, Vidrala has identified roles and functions within the organisation that may face higher risks of corruption and bribery. While there is no mandatory training program in place, these topics are regularly addressed in relevant forums and through dedicated follow-ups, ensuring that employees and decision-makers are informed about emerging risks and best practices.

Members of the administrative, management, and supervisory bodies also participate in these discussions to stay up-to-date with developments and strategies for preventing corruption and bribery.

Vidrala has offered during the 2024 a total of 10 hours of training to the Board and the Executive Committee related to specific critical risks or updating of the legislation, among others, covering the 100% of people at-risks functions.

	At-Risk Functions
Training Coverage	
Total	8
Total receiving training	8
Delivery Method and duration	
Classroom training	Yes
Computer-based training	No
Frequency	**Annualy**
Topics Covered	
Definition of corruption	Yes
Policies and procedures	Yes

4.3.9 Metrics and Targets

1. Incidents of corruption or bribery

Section to disclose "Incidents of corruption or bribery" as determined in DR "G1-4" from ESRS regulation*.

At Vidrala, we are committed to maintaining the highest levels of integrity and transparency in all our business dealings. We strictly adhere to the policies and laws set to prevent corruption and bribery in our operations. In line with this commitment, we hereby disclose the following information regarding incidents of corruption or bribery during the reporting period of 2024.

Convictions and Fines:

There were no cases of non-compliance related to anti-competitive behaviour, corruption, bribery, money laundering or violation of human rights.

2. Payment Practices

Section to disclose "Payment practices" as determined in DR "G1-5" from ESRS regulation*.

The standard payment terms of the Vidrala Group vary depending on the geographical region and the applicable regulatory framework. In Spain and France, legislation mandates that payments must be made within 60 days from the invoice date, a requirement that we have met in 62% of invoices in Spain and 68% in France. In the other countries where the Group operates – the United Kingdom and Ireland, Brazil, and Portugal – there are no legal deadlines for payment terms, with the average payment periods standing at 65, 27, and 70 days, respectively.

From a consolidated perspective across the entire Vidrala Group, the average supplier payment period in 2024 was 44 days from the invoice date, with 71% of the total amount paid within 60 days.

Electric forklifts in our new warehouse in Marinha Grande, Portugal

4.3.10 Climate change

1. Integration of sustainability-related performance in incentive schemes

Section to disclose "Integration of sustainability-related performance in incentive schemes" as determined in DR "E1-ESRS 2 GOV-3" from ESRS regulation*.

Climate related considerations in remuneration:

At Vidrala, we are deeply committed to embedding climate-related considerations into the core of our corporate governance and decision-making processes, including the remuneration structures for members of our administrative, management, and supervisory bodies. This integration reflects our belief that aligning leadership incentives with our sustainability and corporate responsibility objectives enhances our collective capacity to drive meaningful progress toward a sustainable and resilient future.

> Specifically, the Executive compensation scheme links 30% of the long-term incentive to the achievement of decarbonisation, use of renewable energy and safety targets. Performance is assessed against the GHG emission reduction targets outlined under the Metrics and Targets section.

Below, we outline the specific mechanisms and extent to which climate considerations are incorporated into the remuneration framework, underscoring our commitment to addressing climate-related challenges through transparent and effective governance practices:

Integration of Climate-Related Considerations in Remuneration

Vidrala has integrated climate-related objectives into its remuneration policy, directly aligning the incentives of its administrative and supervisory bodies with its ambitious sustainability goals approved under the Science-Based Targets initiative (SBTi). Specifically, the Executive compensation scheme links 30% of the long-term incentive to the achievement of decarbonisation, use of renewable energy and safety targets. Performance is assessed against the GHG emission reduction targets outlined under the Metrics and Targets section.

Specific Climate Considerations:

At Vidrala, the climate considerations factored into the remuneration policy integrates climate considerations to ensure alignment between leadership incentives and our commitment to sustainability, including references to:

- Decarbonisation Goals: Incentives are directly linked to progress in reducing greenhouse gas emissions, with a focus on improving energy efficiency and increasing the share of renewable energy in our operations.
- Innovation in Sustainability: We encourage innovation by rewarding advancements in adopting new viable technologies, such as electrification of furnaces and the use of hydrogen trials, which form part of our transition plan towards a 1.5°C world.
- Circular Economy Practices: Incentivizing strategies that maximises the use of recycled glass (cullet) usage in our production processes.
- Engagement and Collaboration: Acknowledging the importance of stakeholder engagement, we incentivise actions that foster partnerships across our value chain to promote sustainability and knowledge sharing, specifically with sector organisations to align efforts and achievements.

2. Transition plan for climate change mitigation

Section to disclose "Integration of sustainability-related performance in incentive schemes" as determined in DR "E1-1" from ESRS regulation*.

Vidrala is committed to supporting global efforts in mitigating climate change. While we are actively developing and enhancing measures to align with sustainability goals, below are key components reflecting our current approach:

GHG Emission Reduction Targets

Our aim is to reduce our scope 1 and 2 greenhouse gas emissions in the short term by 47% and our scope 3 emissions by 28%, both by 2030 and with respect to the 2019 figures

Decarbonisation Levers and Key Actions

Key actions include the electrification of our furnaces, a phased analysis and adoption of biofuels, and an increased use of recycled materials like cullet, which not only reduces our dependency on raw materials but also significantly lowers CO2 emissions. Additionally, the renewable energy integration through photovoltaic systems and targeted energy efficiency upgrades further enhance our efforts to minimise emissions and drive sustainable operations.

Alignment with Commission Delegated Regulation 2021/2139

Our aim is to ensure that all our economic activities align with the criteria outlined in the regulation. To achieve this, we are currently revising our CapEx and OpEx strategies to prioritise sustainability and ensure full compliance as specified in our view of the EU Taxonomy Regulation section.

Business Strategy and Financial Planning Alignment

Sustainability is integral to Vidrala's strategy, with emissions targets embedded in financial planning and operational decision-making, as mentioned in Part II: Our Sustainability Strategy and Glass Industry of the Future

Vidrala's transition plan is based on achieving science-based emission reduction targets and in the periodic monitoring of climate-related risks. While the plan is currently under development, its key components have already been analysed and approved by our Administrative and Management Bodies, establishing a solid foundation for its formalisation during 2025. In the meantime, we actively monitor all related aspects and provide annual updates in this report to ensure alignment with our sustainability objectives and regulatory requirements.

3. Material IRO and their interaction with strategy and business model

Section to disclose "Material impacts, risks and opportunities and their interaction with strategy and business model" as determined in DR "E1-ESRS 2 SBM-3" from ESRS regulation*.

Identifying and assessing climate-related risks

To establish The Group's exposure to climate-related risk, we developed a comprehensive list of both **physical and transition risks and opportunities** with the support of external climate risk experts. The list of potential climate-related risks and opportunities was built using our risk management framework, and internal stakeholder knowledge. Physical risks relate to the physical impacts of climate change. They can either be acute or chronic. Transition risks are related to the transition to a low-carbon economy, and the impact early or late action could have on the Group. Transition risks cover policy, regulatory, technological, market, reputational and legal risks.

In 2022, the Executive Committee independently assessed a list of climate-related risks and opportunities based on potential future impact, as well as the time horizon over which these could impact the Group. During 2024, the analysis have been reviewed and will be updated in 2025.

The risks identified are refined according to their **impact, time horizon and likelihood materiality**. This process assessed our top risks and opportunities against three different climate scenarios, including Current Policies (above 3°C), Delayed Transition (2°C) and Net Zero by 2050 (1.5°C). By analysing our top risks and opportunities across these climate scenarios, it allows us to better understand the importance of taking early action to combat future impact and implement risk management strategies to mitigate the risks.

In 2022, the Executive Committee independently assessed a list of climate-related risks and opportunities based on potential future impact, as well as the time horizon over which these could impact the Group. During 2024, the analysis have been reviewed and will be updated in 2025.

Climate risk into risk management

Risk management at The Group involves procedures supervised by the directors, coordinated by management. The Group are taking action to ensure all climate-related risks that could result in a potentially material impact are managed. To ensure this, the Group ensure effective **planning, mitigations and controls are put in place** to reduce the future impact. All climate-related risks and opportunities identified within this process are embedded into the risk register and risk management framework. The Audit Committee are responsible for clearly documenting the ownership of the risks, as well as the various controls and actions taken to mitigate and adapt to climate-related risks and opportunities. Further alignment with the internal Financial Risk will be developed in 2025.

We recognise that monitoring and managing climate-related risks effectively will be key to ensuring our business will thrive in a low-carbon society. Effective risk management also requires early action to help mitigate and adapt to the impact of climate change in the future. To improve the resilience of our organisation against our most material climate-related risks, the Group review mitigations and controls on an annual basis. Following best practice, the Group recognises the importance of developing a Net Zero transition plan to 2050. This will be developed to ensure that the Group can reinforce future resilience whilst remaining competitive and financially stable in a Net Zero world. This will allow us to understand how risk management and adaptation can be improved for the Group, while ensuring the Group's decarbonisation targets can be achieved.

4. Description of the processes to identify and assess material climate-related IROs:

Section to disclose "Description of the processes to identify and assess material climate-related impacts, risks and opportunities" as determined in DR "E1-ESRS 2 IRO-1" from ESRS regulation*.

Strategy

We have assessed climate-related risks across every aspect of our value chain, assessing the risks across our own business operations, and products and services. We have also considered the varying climate-related risks and opportunities across the geographic regions in which we operate. As a result, we identified the six top climate-related risks and five top climate-related opportunities that could have a material impact upon the Group (table 1). Of these six risks, four are transition risks and two are physical risks.

The climate-related risks and opportunities have been classified by the time horizon within which we anticipate the impact to occur. These include:

- Short-term: 0-5 years (2023-2028)
- Medium-term: 5-10 years (2029-2034)
- Long-term:10-27 years (2035-2050)

Table 1: The Group's Top Climate-Related Risks and Opportunities by Time Horizon

Category	Category overview	Risk / Opportunity	Time horizon
Transition Risks	Increased likelihood of regulation and climate litigation puts companies due to the transition to a low-carbon world. Transition risks include market, technology, and reputational risks.	Energy price volatility and supply security	Short-term (2023-2028)
		Increased cost of raw materials decreasing revenue if absorbed or making products less competitive if passed on	Short-term (2023-2028)
		Damaged reputation through not meeting enhanced emissions reporting obligations imposed by regulators and suppliers	Short-term (2023-2028)
		Inappropriate or untimely investment in technology leading to increased costs, reinvestment needs and failure to meet strategy	Medium-term (2029-2034)
Physical Risks	Physical risks relate to the physical impacts of climate change. They can either be acute and/or chronic.	Growing risk of drought and an increase in water scarcity could impact ability to produce products at maximum capacity	Long-term (2035-2050)
		Extreme weather events (flooding, drought, wildfires etc.) could cause disruption to business operations	Long-term (2035-2050)
Opportunities	These relate to the potential opportunities The Group could reap from taking early action to transition to a low-carbon world. Net Zero could lead to new strategy, markets, and investment.	Green capital knowledge could open access to green finance	Short-term (2023-2028)
		Strengthening relationships with internal & external stakeholders, expanding business opportunities	Short-term (2023-2028)
		Policy incentives driven by climate change for using a particular energy source may result in a cost saving. Early action on climate change could lead to a favourable position for public policy	Long-term (2035-2050)
		Investing in the use of Cullet (recycled glass) can help to reduce The Group's reliance on virgin raw materials, as well as help reduce energy consumption	Medium-term (2029-2034)
		Using new technologies, more environmentally-friendly fuels and developing new products and services is an opportunity to increase the brand image and the Group's reputation	Medium-term (2029-2034)

Undertaking climate-related scenario analysis allows us to assess the impact of our top climate-related risks and opportunities across three climate scenarios by time-horizon. Scenario analysis ensures that our business can adequately plan potential impact into our 4Ps strategy and address risks and uncertainties, as well as capitalise on opportunities presented.

Understanding the potential impact of the risk or opportunity to the business ensures that we promptly implement mitigating controls. The Group recognises the importance of updating the identification of our top climate-related risks and opportunities to ensure these remain relevant with the current external climate. The Group are assessing the implementation of a formal climate-risk and opportunity identification cadence every two years, while recognising ad-hoc reviews should occur as required. For example, since the previous reporting year The Group recognised that the climate-related risk, "Damaged reputation through not meeting enhanced emissions reporting obligations imposed by regulators and suppliers" should be considered as a "Short-term" risk rather than a "Medium-term" risk. This has been particularly driven by the recent Corporate Sustainability Reporting Directive (CSRD) requirement.

Determining focal questions prior to undertaking the scenario analysis helped to guide the key questions, and decisions the Group need to consider following the identification of a climate-related risk and/or opportunity. The Group identified broad focal questions that cover overarching strategy decisions relating to climate-related risks and opportunities, as well as more specific focal questions per individual risk. The Group recognises that our overarching focal questions are likely to develop each year as our climate-related risk identification, and assessment matures over time.

Climate scenarios

In order to understand and plan for how we will be impacted in plausible future climate scenarios, we selected the most appropriate scenarios to use for the assessment.

The Network for Greening the Financial System (NGFS) Framework is one of the TCFD recommended frameworks for scenario analysis and meets the recommendation to assess business resilience under different climate-related scenarios, including a 2°C or lower scenario.

	Net Zero 2050 (1.5ºC)	Delayed Transition (2ºC)	Current Policies (3ºC)
What does this mean?	1) Policies are implemented immediately and smoothly. 2) Technology change is fast and there is reliable on CO_2 removal. 3) Global carbon prices over $600USD/t$CO_2$e by 2050. 4) Aligned to RCP 2.6 - equivalent of warming of above 1ºC.	1) Without immediate additional policies, emissions rise until 2030. After 2030, there are stringent policies imposed causing emissions to decline aggressively to get to Net Zero by 2050. 2) Carbon pricing increases over $200 USD/tCO2e between 2030 and 2050. 3) Aligned to RCP 4.5 -equivalent of average warning of above 1,5ºC by 2050.	1) Only currently implemented policies influence businesses and society, leading to a continued rise in emissions. 2) Technology change remains slow. 3) No modelled changed. 4) Aligned to RCP 8.5 -equivalent to an average warming of above 2ºC by 2050.
What is the impact?	**Higher** transition risk: **Lower** physical risk. **Sharp changes** towards **decarbonising** all aspects of the **economy** from today.	Transition risk high in this scenario with increased physical risk. **Higher** transition risk; **significant** physical risk. **Aggressive change** towards decarbonising the economy **from 2030** onwards .	Limited transition risk: Higher physical risk. Reduced support to limit the effects of climate change - only current policies applied.

Transition risks are modelled to have the highest risk to the Group in a Net Zero 2050 and Delayed Transition Scenario over the medium-long term. The risk is highest in these scenarios as new stringent legislation, regulation, and carbon taxes will likely be put in place to help transition to a low-carbon society. This is driven by increased pressure from governments, investors, and customers to decarbonise. Over the long-term, the Group can expect the highest impact in a Delayed Transition Scenario, as late action is expected to cause strict regulations to be imposed quickly. In a Current Policies Scenario, limited change to current regulation and carbon pricing is expected, and as such the impact of transition risks remain low in this scenario.

Table 2: Transition risks impact on The Group by time horizon and climate scenario

Scenario 1: Current policies (3 °C) - Business as Usual

Scenario 2: Delayed transition (2 °C) - Late action taken

Scenario 3: Net Zero 2050 (1.5 °C) - Smooth transition

Transitional risk category	Scenario	Short-term (2023-2028)	Medium-term (2029-2034)	Long-term (2035-2050)
Energy Price & Supply Security	1	High	High	High
	2	High	High	Very High
	3	High	Very High	Very High
Raw Materials	1	Medium	Medium	High
	2	Medium	High	Very High
	3	High	High	Very High
Reputation	1	Low	Low	Low
	2	Low	Very High	High
	3	Very High	High	High
Technology	1	Medium	High	Very High
	2	Medium	High	High
	3	Medium	Medium	High

Due to the differing geographic regions in which we operate, an increase in the physical risks of climate change poses a risk to the Group in the long term. It is important to take early action to ensure effective planning, controls and mitigation actions are taken to reduce the impact of physical risk in the future. Scenario analysis highlighted that physical risks pose the most severe impact under a Current Policies Scenario. Limited climate action will cause warming to be highest in the medium-long term, with warming potential modelled to exceed 3°C. It is important to note that there is still risk in a delayed transition and Net Zero 2050 scenario, mainly due to the uncertainty surrounding the analysis of physical risks. This uncertainty is due to the potential to reach a tipping point, causing severe and unpredictable extreme weather events.

Table 3: Physical risks impact on The Group by time horizon and climate scenario

Scenario 1: Current policies (3 °C) - Business as Usual

Scenario 2: Delayed transition (2 °C) - Late action taken

Scenario 3: Net Zero 2050 (1.5 °C) - Smooth transition

Transitional risk category	Scenario	Short-term (2023-2028)	Medium-term (2029-2034)	Long-term (2035-2050)
Reputation	1	Medium	High	Very High
	2	Medium	High	High
	3	Low	Medium	High
Technology	1	Medium	High	Very High
	2	Medium	High	High
	3	Medium	Medium	High

For more detail, please refer to section Material IROs for Vidrala Group in this report.

5. Our Policies and Plans addressing a Green Future

Section to disclose "Policies related to climate change mitigation and adaptation" as determined in DR "E1-2" from ESRS regulation*.

Vidrala integrates its commitment to climate change mitigation and adaptation within its broader sustainability and environmental management approach. Our strategy is centred on continuous improvement in processes, energy efficiency, and resource optimisation, aligning with our sustainability and decarbonisation objectives.

In terms of climate change mitigation, we actively work to reduce the environmental impact of our operations by prioritising energy efficiency in the use of gas and electricity, enhancing the environmental performance of our processes, and adopting more sustainable solutions in the procurement of products and services.

Regarding climate change adaptation, we take a proactive approach by identifying and managing risks associated with our activities, ensuring the implementation of safety, resilience, and resource efficiency measures across our facilities and processes. Additionally, we maintain ongoing dialogue with our stakeholders to anticipate and address potential impacts, aligning our strategies with evolving expectations and environmental challenges.

Moreover, our integrated Policy includes also references related to our commitment over climate change and sustainability. This Policy, signed in 2020, is being under review and will be updated during 2025.

6. Actions and Resources in relation to Climate Change policies

Section to disclose "Actions and resources in relation to climate change policies" as determined in DR "E1-3" from ESRS regulation*.

a) Vidrala's decarbonisation strategy is built on a multi-faceted approach that integrates energy efficiency improvements, alternative fuels, renewable energy adoption, and circular economy initiatives. Our key decarbonisation levers include:

- **Electrification of Furnaces:** Integration of electric boosting technology, currently at 10-15%, with new furnaces incorporating 25% electrification capacity and future designs targeting 40% electrification.

- **Alternative Fuels:** We are actively preparing for the introduction of biofuels in 2025, following 2024 feasibility studies. This transition will be backed by Guarantees of Origin (GdOs) to ensure traceability and sustainability. Previous trials using low carbon biofuels have demonstrated the feasibility of this approach, paving the way for wider implementation.

- **Circular Economy Initiatives:** Maximisation of cullet (recycled glass) usage is one of the most effective strategies for reducing the carbon intensity of glass production. Every 10% increase in cullet content leads to a 2.5% reduction in direct energy consumption and corresponding CO_2 reductions, making it a key decarbonisation lever. Efforts are also underway to explore the use of decarbonised raw materials, selecting components that have undergone pre-treatment or incineration to lower their embedded emissions. In 2024, Vidrala achieved 53% of cullet usage rate, and the company aims to further increase this proportion as established in the cullet plan.

- **Renewable Energy Integration:** Expansion of on-site photovoltaic installations, reducing Scope 2 emissions while supporting self-consumption.

- **Hydrogen Projects:** Participation in hydrogen valley initiatives (Nazaré, Hainet, and Aiala) to explore its potential as an alternative low-carbon energy source. While hydrogen is not yet commercially viable for full-scale operations, participation in these projects ensures Vidrala remains at the forefront of industrial decarbonisation solutions.

- **Energy Efficiency and Industrial Optimisation:** The furnace renewal plan integrates energy-efficient designs that enhance thermal performance and reduce energy losses. Continuous modernisation of furnace technology, enhancing thermal efficiency while reducing absolute and intensity-based emissions and light-weight and right-weight of our product.

b) Achieved GHG Emission Reductions

Vidrala's science-based decarbonisation targets (SBTi) establish clear goals for emissions reductions: Scope 1 and 2 GHG emissions: Targeted 47% reduction by 2030, using 2019 as the baseline. Scope 3 GHG emissions: Targeted 28% reduction by 2030, also benchmarked against 2019 levels. These targets reflect our commitment to a 1.5°C trajectory in line with the Paris Agreement and reinforce the importance of executing our transition initiatives effectively and will depend on the availability and allocation of resources.

7. Targets Related to Climate Change Mitigation and Adaptation

Section to disclose "Targets related to climate change mitigation and adaptation" as determined in DR "E1-4" from ESRS regulation*.

The Group recognises the importance of having underlying metrics and data to assess the Group's current stance on responding to climate-related risks and opportunities, as well as the importance of setting transparent targets based on this data. Having clear and transparent metrics and targets ensures that progress is monitored over time and guarantees that climate-related risks and opportunities remain aligned to strategy and risk management processes.

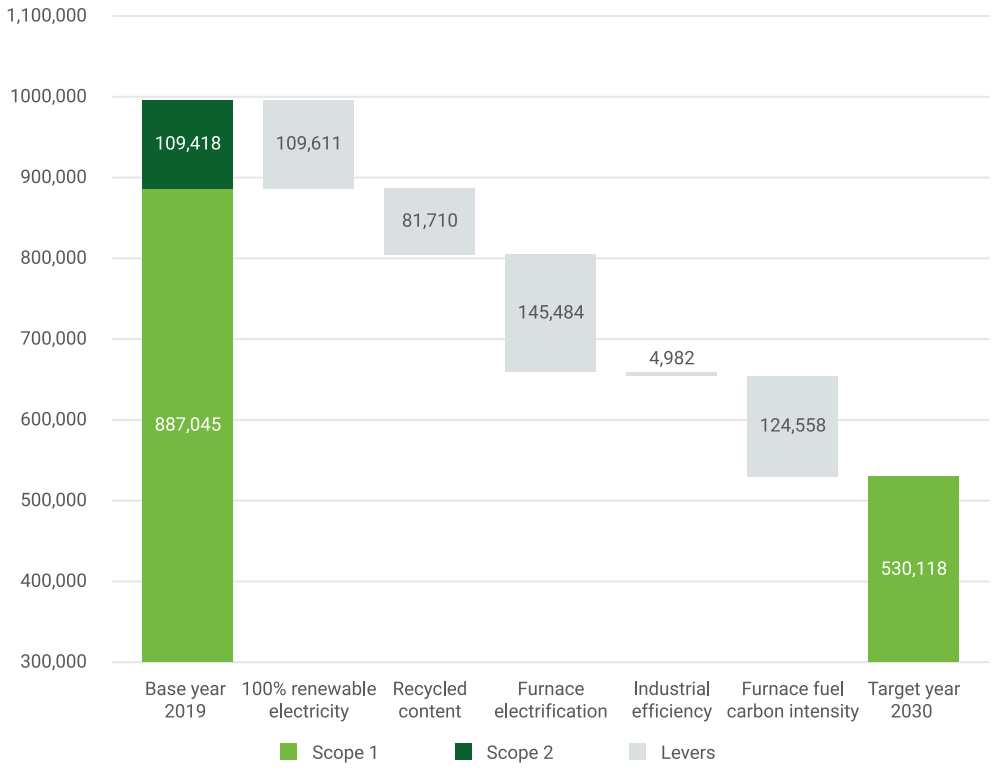
We report greenhouse gas (GHG) emissions, including Scope 1, 2 and 3 emissions. We set a Near-Term Science-Based Target (SBT) for Scope 1, 2 and 3 to **drive decarbonisation by 2030, and had our Net Zero Target validated by the SBTi in 2023**. As mentioned in other sections, our aim is to reduce our scope 1 and 2 greenhouse gas emissions in the short term by 47% and our scope 3 emissions by 28%, both by 2030 and with respect to the 2019 figures. For more details, please refere to Gross Scopes 1, 2, 3 and Total GHG emissions section.

Improving our energy efficiency and reducing energy consumption are important metrics to help mitigate the risk of energy prices and supply volatility. The result of our continued investment in energy efficiency and energy reduction projects across the business is presented in the Part II Our Sustainability Strategy section.

Drought and water scarcity emerged as a long-term physical risk for The Group. The potential impact to our business and our local communities makes it vital that we **take steps to reduce our water consumption and improve water efficiency across our operations**. We track our water consumption to determine the water intensity ratio per tonne of glass. The Group has developed a 2030 implementation plan, including specific targets and water efficiency initiatives to drive water reduction in the future.

The Group is in the process of reviewing and refining our metrics and targets with relevant internal stakeholders for the most material climate-related risks and opportunities identified. These metrics will help track the magnitude of the risks, the Group's exposure, and the effectiveness of our controls. The work will also help us to capture and maximise climate opportunities, further strengthening our resilience during the transition to a low-carbon economy.

Main decarbonisation levers for our scope 1+2 target (-47% by 2030)



To ensure the baseline value is representative, Vidrala has established a methodology that considers all relevant activities, operational boundaries, and external influencing factors, including regulatory changes, market conditions, and energy supply variations. The baseline is reviewed periodically to maintain accuracy and relevance.

8. Energy Consumption and Mix:

Section to disclose "Energy consumption and mix" as determined in DR "E1-5" from ESRS regulation*

In 2024, Vidrala continued to prioritise sustainability as a core component of its business strategy. This report outlines our energy consumption and mix, focusing on providing a detailed understanding of our energy footprint, improvements in energy efficiency, and our commitment to increasing the share of renewable energy in our overall energy mix.

In 2024, we started exploring the feasibility of introducing biofuels at Vidrala. Building on these initial studies, we will continue testing in 2025 to see how viable their use can be. This year, for the first time, we have invested in guarantees of renewable origin in biomethane, sourced from the Spanish grid.

At Vidrala, we know that reducing our consumption is essential to lowering our carbon intensity. However, we also need to diversify our fuel sources to achieve proper decarbonisation. By improving energy efficiency and using fuels with a lower carbon impact, we aim to make our operations more sustainable.

Energy intensity improved by 3% in 2024 compared to 2023, owing to our efforts to reduce the energy required for melting and the increased use of cullet in our production process.

Vidrala remains committed to integrating sustainability into its financial planning and operational strategy. The allocation of financial and other resources to our action plan is aligned with our long-term vision and ongoing business priorities. Over the coming years, Vidrala will refine its methodology to provide a more detailed and structured approach to assessing and disclosing these financial indicators, enabling a more transparent linkage between financial planning and sustainability commitments.

Energy consumption from non-renewable sources		
Energy consumption and mix	2023	2024
(2) Fuel consumption from crude oil and petroleum products (MWh)	–	15,438.28
(3) Fuel consumption from natural gas (MWh)	–	3,189,401.86
(4) Fuel consumption from other fossil sources (MWh)	–	219.85
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	254,568.00	396,754.12
(6) Total fossil energy consumption (MWh)	**3,084.86**	**3,601,814.11**
Share of fossil sources in total energy consumption (%)	**90 %**	**90 %**

Energy consumption from renewable sources		
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	–	1,531.70
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	364,505.14	363,607.24
(10) The consumption of self-generated non-fuel renewable energy (MWh)	26,278.18	26,793.06
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	**390,783.32**	**391,932.00**
Share of renewable sources in total energy consumption (%)	**10 %**	**10 %**
Total energy consumption (MWh)	**3,730,209.13**	**3,993,746.12**
Total energy consumption per net revenue	**0.26 %**	**0.25 %**

Total energy consumption from activities in high climate impact sectors		
Net revenue**	€1,427	€1,588
Total energy consumption from activities in high climate impact sectors* **	**0.26 %**	**0.25 %**

*The comparative data reported will be presented aligned with the national requirements established by Law 11/2018, which were audited by an independent third party in 2024. Net revenue figure can be seen in the Consolidated Financial Statements in Consolidated Profit and Loss Statement.**Net revenue figure can be seen in the Consolidated Financial Statements in Consolidated Profit and Loss Statement. ***High climate impact sector as defined in Commission Delegated Regulation (EU) 2022/1288.

9. Gross Scopes 1, 2, 3 and Total GHG emissions:

Section to disclose "Gross Scopes 1,2,3 and total GHG Emissions" as determined in DR "E1-6" from ESRS regulation*.

The carbon intensity associated with Scope 1 and 2 emissions has improved in both market-based and location-based methodologies compared to the previous year, reflecting a decrease of 2% and 3%, respectively. This positive trend aligns with an overall reduction in global energy consumption, a higher percentage of renewable electricity, the introduction of some new, more efficient and electrified furnaces, and an increased use of cullet in production. However, in absolute terms, Scope 1 emissions have risen by 7% due to operational expansions. Meanwhile, Scope 2 emissions have decreased by 6% (market-based) and 8% (location-based), driven by updated emissions factors and improved electricity sourcing strategies, including the purchase of renewable volumes and on-site self-generation.

The carbon intensity associated with Scope 1 and 2 emissions has decreased by 2% and 3%, respectively. This positive trend aligns with an overall reduction in global energy consumption, a higher percentage of renewable electricity, the introduction of new, more efficient and electrified furnaces, and an increased use of cullet

Scopes 1, 2, 3 and Total GHG emissions

	Retrospective				Targets and milestones	
	2019	2023	2024	%N / N-1	2030	Annual % Target / base year
Scope 1 GHG Emissions						
Gross Scope 1 GHG emissions (tCO2eq)	887,045	855,850	919,171	7 %		4 %
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)		99 %	99 %	— %		— %
Scope 2 GHG Emissions					47%	
Gross location-based Scope 2 GHG emissions (tCO2eq)	188,493	119,362	109,647	(8)%		(42)%
Gross market-based Scope 2 GHG emissions (tCO2eq)	109,418	59,022	55,666	(6)%		(49)%
Significant scope 3 GHG emissions						
Total Gross indirect (Scope 3) GHG emissions (tCO2eq)	816,949	1,015,447	1,114,019	10 %		36 %
1 Purchased goods and services	565,652	662,739	543,620	(18)%		(4)%
2 Capital goods	2,253	33,118	59,408	79 %		2537 %
3 Fuel and energy-related Activities (not included in Scope1 or Scope 2)	123,140	129,886	139,652	8 %		13 %
4 Upstream transportation and distribution	78,647	131,847	55,023	(58)%		(30)%
5 Waste generated in operations	916	2,871	12,722	343 %		1289 %
6 Business traveling	1,357	1,602	1,270	(21)%	28%	(6)%
7 Employee commuting	2,224	6,241	8,109	30 %		265 %
8 Upstream leased assets	0	26	19	(27)%		— %
9 Downstream transportation	8,614	5,178	192,747	3622 %		2138 %
10 Processing of sold products	0	0	81,121	— %		— %
11 Use of sold products	0	1,039	3,034	192 %		— %
12 End-of-life treatment of sold products	34,146	40,900	17,294	(58)%		(49)%
Total GHG emissions						
Total GHG emissions (location-based) (tCO2eq)	1,892,487	1,990,659	2,142,837	8 %		13 %
Total GHG emissions (market-based) (tCO2eq)	1,813,412	1,930,319	2,088,856	8 %		15 %

The data presented in the table reflects a perimeter variation implemented during 2024. In future reports, the normalised data will be represented alongside the update of our SBTi targets, which are currently undergoing a rebaseline process.

10. Scopes 1, 2, 3 and Total GHG emissions

Scope 1

Our emissions primarily derive from the use of fossil fuels for the fusion process and the decarbonisation of carbonated raw materials. These two source flows account for 99% of our Scope 1 emissions. The remaining emissions, also calculated, come from the mobile combustion of internal material transport, own fleet and fugitive emissions from the exchange and replenishment of refrigerant gases. This year, we have seen a 7% increase compared to the previous year due to a change in scope, as we have included our two facilities in Brazil for the first time. We are working on replacing furnaces at the end of their life cycle with more efficient technology, lower consumption, increased electrification, and a higher percentage of recycled glass in the composition. Additionally, we have calculated 37.93 tCO_2 of biogenic emissions.

Accounting Principles

All emissions included in Scope 1 of greenhouse gas (GHG) emissions are calculated using direct activity data, with emission factors available in each national inventory where we have facilities, and additionally, using the most updated version of DEFRA.

Scope 2

Our Scope 2 emissions primarily derive from the use of electricity for glass melting and auxiliary production processes in our facilities, as well as for filling processes at our beverage facilities in the UK. Despite the change in scope, our strategy of diversifying sources of electrical energy has allowed us to achieve a reduction in Scope 2 emissions based on market and location by 8% and 6%, respectively. There are no biogenic emissions in this scope.

Four of our facilities have a renewable Guarantees of Origin contract for 100% of their electricity. Additionally, we have three facilities with installed solar panels that supply between 5% and 20% of the total power consumption of these facilities. Finally, in 2024, we have ensured that 30% of the electricity for our three facilities in Spain comes from renewable sources, supported by Guarantees of Origin.

Vidrala is committed to decarbonisation by increasing the electrification of the melting process, but always accompanying electrification with a strategy to incorporate, as far as possible, electricity from renewable sources.

Accounting Principles

All emissions included in Scope 2 of greenhouse gas (GHG) emissions are calculated using direct activity data, with emission factors available in each national inventory where we have facilities, and additionally, using the most updated version of DEFRA. Furthermore, we use the relevant renewable Guarantees of Origin to see the effect on our market-based emissions.

Scope 3

For Vidrala, the value chain is really important. Consequently, the company has endeavoured to map all emissions within his supply chain, covering all applicable categories. Categories 13 and 14 have been omitted as Vidrala does not possess rental assets or franchises. The final improvement to be started in 2025 is the inclusion of investments in the carbon footprint, corresponding to category 15.

Our main challenges pertain to the extraction of raw materials and the manufacture of packaging materials, as well as emissions related to fuel and electricity consumption and the transportation of the finished product. These are the most significant categories for the Vidrala Group, and we are actively working on obtaining more and better information to reduce our emissions.

In general, Vidrala has enhanced its methodology and data capture across several categories, allowing for more accurate emissions. Currently, no primary supplier data or other value chain partners are utilised, although progress will be made in 2025 to start incorporating data from the most significant suppliers.

Specific references for each category are included below.

Scope 3 - Category 1: Purchased Goods and Services

Greenhouse gas (GHG) emissions arise from sources located outside the organisational boundaries associated with the goods used by the organisation. These sources can be stationary or mobile and are linked to all types of goods purchased by the reporting organisation.

We have achieved an 18% reduction due to an improvement in the calculation methodology and better control of activity data.

Accounting Principles

Our products with the highest emission values are raw materials and packaging (~95% of Category 1 emissions). For this reason, in 2024, we calculated the emissions associated with these two major product groups based on actual activity data rather than expenditure. We also calculated, using activity data, the emissions associated with water consumption and discharge (~1%).

The remaining emissions (~4%) were based on economic cost and the type of product or service.

Scope 3 - Category 2: Capital Goods

GHG emissions arise from sources located outside the organisational boundaries associated with the goods utilised by the organisation in investments made during the calendar year 2024. These sources can be stationary or mobile and are linked to all types of goods purchased by the reporting organisation.

This category has seen a 79% increase compared to the previous year due to significant investments in the renewal of a total of four furnaces across the Group, among other less significant investments.

Accounting Principles

Based on the executed CapEx and the type of service or product acquired.

Scope 3. Category 3: Fuel- and Energy-Related Activities (not included in Scope 1 or Scope 2)

Greenhouse gas (GHG) emissions related to the extraction, production, and transportation of fuels consumed and for the generation of electricity that are not included in Scope 1 and Scope 2. Similar to Scope 1 and Scope 2, but more focused on Scope 1, as our boundary expands, our consumption increases, and the emissions related to fuels and electricity also increase.

Accounting Principles

This is carried out using the WTT (Well to Tank) methodology, which accounts for the greenhouse gas (GHG) emissions produced during the fuel production process, from its initial extraction or generation until it is ready to be used in a vehicle, machinery, or equipment. The emission factors are sourced from the most updated version of DEFRA.

Scope 3. Category 4: Upstream Transportation and Distribution

In this specific case, we have made improvements compared to previous years, aligned with the reduction in Category 1 as well. This category evaluates the emissions associated with the transportation and distribution of purchased materials and goods based on the activity data reported in the previous categories.

Accounting Principles

Greenhouse gas emissions have been calculated by considering the fuel used in the transportation of goods and the acquisition of that fuel for this specific transportation. Therefore, we have integrated the Tank-to-Wheel and Well-to-Tank methodologies, providing a better understanding of upstream emissions.

Scope 3. Category 5: Indirect GHG Emissions from Waste Treatment

These are GHG emissions from sources located outside the organisation's boundaries, associated with the disposal of solid and liquid waste (wastewater). The marginal increase in this category is due to the reconstruction of several furnaces within the Group, as such operations generate significant amounts of waste. On the other hand, Vidrala prioritises waste minimisation and valorisation as a strategy to reduce the impact of emissions associated with Category 5.

Accounting Principles

For facilities located in Europe and the UK, we assess the impact on greenhouse gas emissions for each type of EWC code and final treatment, not intermediate, in line with the European Waste Classification. For facilities outside the EU and the UK, more general classifications have been used in accordance with applicable local regulations.

Scope 3. Category 6: Indirect GHG Emissions from Business Travel

GHG emissions mainly arise from fuel combustion in bussines travel of our employees. The emissions associated with business travel are not as significant as those in other categories, such as Category 1, 2, or 9. We are working to better understand the improvement levers in this category, such as hybrid or electric rental cars and reducing unnecessary travel.

Accounting Principles

Greenhouse gas emissions have been calculated by considering the emissions from hosting and the fuel used in transportation (air, land, or rail) as well as the procurement of that fuel for this specific transportation. Therefore, we have integrated the Tank-to-Wheel and Well-to-Tank methodologies, providing a more comprehensive view of these emissions.

Scope 3. Category 7: Indirect GHG Emissions from Employee Commuting

GHG emissions occur outside the organisational boundaries due to fuel combustion in employee transportation, specifically for commuting. Despite its relatively low impact within the overall Scope 3, this category has increased by 30% because we have included Brazil, adding 920 more employees compared to the previous year. This represents an approximate 20% increase of employees compared to 2023 and potentially greater commuting distances than the average for plants in Europe and the UK. We are working to better analyse this category and identify improvement actions.

Accounting Principles

Greenhouse gas emissions have been calculated by considering the employees' home cities and the distance to their nearest production centre. Emissions associated with fuel use in transportation equipment and the procurement of that fuel have been calculated. Therefore, we have integrated the Tank-to-Wheel and Well-to-Tank methodologies, providing a better understanding of emissions from employee commuting. In the coming years, we will incorporate mobility surveys to understand transportation habits and further improve data quality.

Scope 3. Category 8: GHG Emissions from Leased Assets

Emissions from the use of leased assets by the organisation during the reporting year. Although these emissions are calculated, they are insignificant for the organisation.

Accounting Principles

Depending on availability, we use activity data such as natural gas or electricity consumption or the economic expenditure of the lease itself.

Scope 3. Category 9: Indirect GHG Emissions from Transportation of Finished Products

GHG emissions occur outside the organisational boundaries due to the use of fossil fuels in the transportation of our products. The marginal increase in this category is due to an improvement in the methodology, as previous years' calculations were based on the cost associated with transportation. We can also observe a negative impact due to the distances that need to be covered in Brazil to reach customers.

Accounting Principles

The methodology used is based on the number of trucks contracted, the origin of production, and the destination country. This allows us to have a more accurate sum of kilometres and the number of trucks compared to using transportation costs. In this category, we have also integrated the Tank-to-Wheel and Well-to-Tank methodologies, providing a better understanding of emissions from the transportation of finished products.

Scope 3 - Category 10: GHG Emissions from Processing of Sold Products

GHG emissions are generated from the filling of our bottles, which occurs after the sale. This is the first time this data has been reported.

Accounting Principles

The methodology used is based on activity data to calculate emissions by type of glass container sold (wine, cava, sparkling wine, water, pots) and the nominal capacity of each glass container. With this understanding, we can associate a type of processing and, therefore, the natural gas and electricity mainly required.

Scope 3 - Category 11: GHG emissions from use of sold products

End use of goods and services sold by Vidrala in the reporting year. This is the first time this data has been reported.

Accounting Principles

The methodology used is based on activity data to calculate emissions by quantity of bottled product multiplied by the indicator of electrical energy consumption during the cooling stage

Scope 3 - Category 12: GHG Emissions from End-of-Life Treatment of Sold Products

GHG emissions are generated from the treatment of products sold at the end of their life cycle. There has been a significant reduction due to a change in methodology. The glass recycling rates in the countries where we sell, primarily in Europe, are very high. There are some exceptions with lower sales volumes that do not have a significant impact. In the future, improvements in this category may be limited by the recycling rates in Brazil.

Accounting Principles

We consider the tonnes sold in each country and their recycling rates to understand the treatment applied to our products. The remaining percentage is assumed to be lost and sent to landfill, with the associated emissions accounted for accordingly.

11. Internal Carbon Pricing and Carbon Credits

Section to disclose "Internal Carbon Pricing " and GHG removals and mitigation projects financed through carbon credits as determined in DR "E1-8" & "E1-7" from ESRS regulation*

In compliance with ESRS E1-8, we acknowledge the role of internal carbon pricing as a tool for guiding emissions reductions and supporting the transition to a low-carbon economy. At this time, Vidrala does not apply an internal carbon pricing mechanism. Instead, the Group actively employs a range of internal tools and analyses to guide strategic decision-making, reduce greenhouse gas (GHG) emissions, and enhance resilience against climate-related risks.

Our approach encompasses multiple focus areas, ensuring that we address the diverse impacts of carbon pricing on our operations and supply chain:

- **Procurement of raw materials:** We recognise the importance of managing the carbon intensity associated with its carbonated primary raw materials - soda ash, limestone and dolomite - and the key role of cullet in decarbonising the batch.
- **Participation in Emissions Trading Systems (EU ETS/UK ETS):** Vidrala actively monitors developments in the European Union's Emissions Trading System (EU ETS), which directly affects the costs of energy and production emissions. As a participant, the Group evaluates market dynamics, such as allowances prices, and models their potential impact on financial planning.
- **Development of internal modelling tools:** To support our decision-making processes, we count on internal applications that leverage our plants consumption, production and emissions data. These tools integrate past operational performance with predictive analytics, enabling us to simulate various scenarios and assess the financial and operational impacts of carbon pricing.
- **Regulatory Considerations:** Vidrala is closely monitoring regulatory developments and their potential impact on Carbon Pricing, such as the Carbon Border Adjustment Mechanism (CBAM), the Industrial Emissions Directive (IED), or the Renewable Energy Directive (RED II and RED III), among others.

4.3.11 Pollution

At Vidrala Group, as a company included in the catalogue of activities potentially polluting the atmosphere under Royal Decree 100/2011 of 28 January, we carry out rigorous controls in accordance with the regulatory framework. These controls are detailed in our Integrated Environmental Authorisation and are applied to all emission points of polluting gases within our organisation. It is important to highlight that we do not exceed, in any instance, the maximum permissible values for any of the parameters specified in the applicable regulations.

Beyond the requirements of the regulatory framework, our group places significant emphasis on reducing emissions of polluting gases derived from our activities. To achieve this, we employ the methodology of Best Available Techniques (BAT) for the glass industry, which, on a voluntary basis, is applied to all European manufacturers. These measures are implemented during the design phase of new furnaces and during partial repairs of existing ones. They include ecological improvements such as the use of low-NOx emission burners or the replacement of fossil fuels with electrification.

Regarding SOx emissions and other polluting particles resulting from the glass melting process, we have installed electrostatic precipitators in all our factories to reduce them.

As requested by national Law, regarding noise and light pollution, we conduct periodic monitoring to ensure we do not exceed the maximum values established by the regulatory framework applicable to our activities and geographic locations.

We employ the methodology of Best Available Techniques (BAT) for the glass industry, which, on a voluntary basis, is applied to all European manufacturers.

1. Material Impacts, Risks and Opportunities related to Pollution:

Section to disclose "Processes to identify and assess material IRO related to pollution" as determined in DR "E2-ESRS 2 IRO-1" from ESRS regulation*.

We firmly believe in the principles of sustainability and corporate responsibility. We are committed to identifying and addressing the material impacts, risks, and opportunities associated with our operations and value chain, especially with respect to potential pollution-related impacts. In compliance with the requirements, please refer to section Material IROs for Vidrala Group in this report.

The analysis of impacts, risks, and opportunities (IROs) related to pollution was conducted by reviewing environmental assessments required under national regulations for each business unit and evaluating the presence of regulated substances under relevant regulations such as REACH. This assessment identified SOx, NOx, and particulate matter as the primary pollutants linked to our production processes. Consultations were carried out with environmental managers at plant level and the Group Environmental Manager to ensure a consistent and aligned evaluation. To manage these IROs, we have centralised internal monitoring systems, including both continuous and periodic measurements, assessing deviations against the established budget and expected performance capacity.

Related to water, Vidrala is committed to reduce potable water consumption in its UK and EU plants up to a 6% of the total consumption and reduce up to 0,10 m3 per glass melted ton produced among others.

2. Policies related to Pollution:

Section to disclose "Policies adopted by the company to manage IRO related to pollution" as determined in DR "E2-1" from ESRS regulation*. Related to ESRS 2 MDR-P- 62

As a Group, we are dedicated to safeguarding the environment and fostering a greener future. Our Environmental Management Systems around pollution prevention and control are designed to identify, manage, and mitigate material impacts and risks.

Through this Environmental Management System, that covers all Vidrala's production facilities, we foster a framework of procedures and comprehensive tools that enable us to demonstrate our environmental regulatory compliance to our stakeholders. The Group Environmental Manager holds ultimate responsibility for overseeing Vidrala's Environmental Management System (EMS), ensuring alignment with regulatory requirements and internal sustainability objectives. The EMS is developed considering the interests of key stakeholders, including regulatory bodies, customers, employees, and local communities, ensuring that their expectations and concerns are reflected in our environmental commitments. To facilitate implementation and transparency, the policy is made available to all relevant stakeholders, including employees responsible for its execution and external parties potentially affected by its outcomes.

All our activities at Vidrala are performed following the precautionary principle, which lies at the heart of our environmental policy. This policy, which is distributed and known to all our employees, is centred on the following guidelines:

- We foster respect for the environment by preventing pollution, mitigating the environmental impact of our processes and products, and reducing resource consumption. Specifically, we are committed to minimising the energy consumption of our operations.
- We are committed to efficient resource management.
- We comply with applicable legislation and other commitments assumed by public administrations; we scan for current or foreseeable legislative changes that could be applicable to us.

New manufacturing investments in Marinha Grande, Portugal

- We drive continuous improvement at all levels by establishing ways to measure our performance and the impact of our activity, planning for improvement and reviewing the results. We take into account certifications and basic audit tools in this process.

Within Vidrala's strategic guidelines, the implementation of Environmental Management Systems is documented as a priority. In line with this commitment, all of the Group's production facilities are currently certified under ISO 14001:2015 standards, demonstrating that Vidrala effectively operates under the conduct of a global environmental management system, recognised and externally verified.

In relation with addressing material areas:

- Related to air, Vidrala is investing in cleaner technologies and promoting the use of renewable energy sources.

- Related to water, Vidrala is committed to reduce potable water consumption in its UK and EU plants up to a 6% of the total consumption and reduce up to 0,10 m3 per glass melted ton produced among others.

There is also an emergency response plan to manage incidents effectively and to minimise their impact on people and the environment, as mentioned in Part II: Our Sustainability Strategy - Health and Safety section. Additionally, standardised procedures are established for spill response in specific plants, ensuring prompt action in the event of a release. In cases of emission exceedances, predefined protocols dictate the notification process, whereby the responsible party reports the issue to the plant manager or environmental management officer, and, if necessary, the relevant authorities are informed in accordance with regulatory requirements.

Furthermore, in line with the commitment to continuous improvement, processes have been initiated to implement and verify new environmental standards such as ISO 14064:2018 in 5 of our production facilities, related to the voluntary declaration of CO2 emissions, or ISO 50001:2018, on energy management systems, already certified in 5 of our factories. Additionally, from April 2025, we will transition to a global group-wide verification for CO_2 footprint assessment, further enhancing the consistency and transparency of our emissions reporting.

3. Pollution-related Actions and Implementation Resources

Section to disclose "Actions and resources related to water and marine resources" as determined in DR "E2-2" from ESRS regulation*.

Vidrala Group makes constant efforts in addressing pollution-related concerns and implements, as mentioned, the Best Available Techniques (BAT) in line with ISO 14001:2018 guidelines. Our approach to pollution management aligns with national legal requirements involving prevention, reduction, and control of pollution. Vidrala maintains an investment commitment specifically aimed at minimising the potential polluting effect of its facilities.

Our approach to pollution management aligns with a tiered mitigation hierarchy involving prevention, reduction, and control of pollution. Here, we provide a detailed account of our initiatives:

As part of our continuous improvement efforts, we are upgrading our automatic measurement systems across production facilities. This modernisation will enhance our ability to monitor pollutants in real time, allowing for more effective tracking and control of emissions. The total investment allocated for this initiative is €193,000, supporting a more precise and proactive approach to pollution management, reinforcing our strategic goal of optimising pollution control measures through enhanced data collection and analysis capabilities. The roll-out of these advanced monitoring systems is planned for progressive implementation, ensuring seamless integration within our existing environmental management framework. The initiative aligns with our broader pollution reduction strategy, supporting regulatory compliance and long-term sustainability targets.

Related to our commitment of reducing pollution, including any phase-out of materials, in recent years our efforts have been materialised in an investment project developed for the installation in all production centres of special systems for purifying atmospheric emissions, called electrostatic precipitators or electrofilters. These installations are aimed at reducing emissions of polluting particles and are recognised as the best technology available for this purpose by European regulations. The installed electrofilters act by retaining the particles generated in the fusion process by attracting them through electric fields, achieving a reduction in the usual emissions from glass melting furnaces by more than 90%. The electrofilters installed at Vidrala have been accompanied by SOx emission purification systems, desulphurisers, which have allowed the emission of this pollutant to be considerably reduced.

At Vidrala, reducing emissions and minimizing pollutants are key priorities embedded in our operational strategy. Internally, we allocate financial resources to initiatives focused on improving air quality, reducing industrial emissions, and enhancing environmental controls. While these measures are already part of our investment planning, the methodology for assessing and publicly reporting these financial commitments will be further developed. Furthermore, we will evaluate further actions related to our value chain, as current impacts, risks and opportunities are associated with our own operations.

4. Targets related to Pollution

Section to disclose "Targets related to water and marine resources" as determined in DR "E2-3" from ESRS regulation*

Vidrala is in the process of developing measurable outcome-oriented targets to manage pollution. Over the next two years, we will focus on defining sector-oriented targets aligned with national laws as requested, ensuring they are supported by a calculation baseline and references aligned with regulatory frameworks of the countries in which we operate.

However, Vidrala is focused on identifying material sustainability-related impacts, risks, and opportunities (IROs), as described in Material IROs for Vidrala Group section, where we outline our methodology for their evaluation and identification.

While formal targets are not yet in place, we are closely monitoring the effectiveness of our policies and actions in addressing the identified IROs. To support this, Vidrala will implement a systematic evaluation method, such as internal audits for control systems, stakeholder engagement, and performance reviews, to track progress. In addition, qualitative benchmarks and preliminary performance indicators are helping us assess our direction while laying the foundation for a more structured, data-driven approach.

5. Pollution of air, water and soil:

Section to disclose "Pollution of air, water and soil" as determined in DR "E2-4" from ESRS regulation*.

During the reporting period of 2024, Vidrala emitted various pollutants classified under Annex II of Regulation (EC) No 166/2006, as shown in the following table:

Pollutant Type

Pollutant Type	Emission to Air (Tonnes) 2023	Emission to Air (Tonnes) 2024
Sulphur Dioxide (SO2)	3,090	3,074
Nitrogen Oxides (NOx)	4,739	3,014
Particles	82	179

As an output of our double materiality process, water and soil pollution were not evaluated as material.

Contextual disclosures include:

- **Changes over Time:** We will track the changes in overall pollutants emission.
- **Measurement Methodologies:** The pollutants were quantified using a combination of direct measurement and estimation methods.
  - **Direct Measurement:** Deployed at source points to capture real-time data.
  - **Estimation:** We apply stacktest where direct measurement is unfeasible, as established in national regulation.
- **Data Collection Process:** Our data collection process encompasses the following steps:
  - **Identification of Sources:** Mapping out emission sources within our operations.
  - **Data Gathering:** Employing automated monitoring systems and manual data collection where necessary.
  - **Data Verification:** Ensuring the accuracy and consistency of the collected data in compliance with ISO 14001, with most of our sites adhering to the UNE standard. Relevant regulatory bodies are informed, and in cases of errors, they actively support us in identifying and resolving issues to maintain data integrity.
  - **Consolidation & Reporting:** Aggregating data to develop a comprehensive report.

4.3.12 Water

Drought and water scarcity have become long-term health risks at Vidrala. The potential impact on our business and local communities requires action to reduce water consumption and improve water efficiency across all activities.

1. Material Impacts, Risks, and Opportunities related to Water

Section to disclose "Processes to identify and assess material water and marine resources-related IRO as determined in DR "E3-ESRS 2 IRO-1-8" from ESRS regulation*.

We firmly believe in the principles of sustainability and corporate responsibility. We are committed to identifying and addressing the material impacts, risks, and opportunities associated with our operations and value chain, especially with respect to potential water-related impacts. In compliance with the requirements, please refer to section Material IROs for Vidrala Group in this report.

Impact, risk and opportunity overview

Vidrala Group is actively enhancing water efficiency through rainwater harvesting, greywater reuse, and process water recuperation, reducing reliance on external sources and mitigating water stress. High wastewater treatment standards ensure safe discharge for industrial and community use. However, water withdrawals for raw material extraction, particularly in quarrying, pose challenges by impacting local water availability and ecosystems.

Vidrala Group has identified key opportunities related to water use in its operations. Efficient and responsible water management presents cost-saving potential by optimising consumption during manufacturing processes. Additionally, adopting circular water systems could reduce water procurement costs and enhance operational resilience during periods of water scarcity. Both opportunities have been assessed as likely to occur frequently, with a low financial impact, but remain material for reporting due to their relevance in sustainability and operational efficiency.

Consultations on water and marine resource management have been primarily conducted internally, ensuring alignment with the regulatory frameworks of each country where Vidrala operates. These consultations have involved cross-functional collaboration between environmental management teams, sustainability departments, and operational units to assess water usage, discharge practices, and compliance requirements.

2. Policies related to water

Section to disclose "Policies adopted by the company to manage IRO related to water and marine resources" as determined in DR "E3-1" from ESRS regulation*.

The Water Policy of Vidrala establishes our commitment to responsibly manage the water resource in all our industrial operations. We pledge to use water efficiently and responsibly, comply with current regulations and standards, continuously monitor and evaluate our water performance, train our employees in sustainable practices, collaborate with our stakeholders (including suppliers, customers, local communities, and environmental organisations), foster innovation and continuous improvement, and promote transparency and disclosure of our efforts. This policy, led and monitored by the Group Engineering Director, reflects our commitment to environmental sustainability and corporate responsibility, guiding our actions to ensure the conservation and responsible use of water in all our operations and it's internally available for all employees.

The objectives of our 2030 Improvement Plan are focused in defining water management practices, including measuring and reducing water usage, managing water-related risks, and implementing strategies to improve water efficiency and conservation. This involves definition of water use and availability, conservation strategies, initiatives to minimise water-related environmental impacts, and any other relevant actions for sustainable water management.

Our policy defines water management practices, ensuring efficient consumption, regulatory compliance, and impact reduction. In water sourcing, we assess availability at each site, minimise withdrawal impacts, and prioritise alternative sources such as rainwater collection and water recycling. For water treatment, we maintain high-quality discharge standards, invest in advanced treatment technologies, and ensure compliance with environmental regulations. Our approach includes optimising resource use, reducing water consumption in production, and fostering circular economy principles to limit dependency on freshwater sources.

The objectives of our 2030 Improvement Plan is focused in defining water management practices, including measuring and reducing water usage, managing water-related risks, and implementing strategies to improve water efficiency and conservation. Related to water risk areas, we have incorporated different analysis based on internationally recognised methodologies, such as WWF risk categorisation and financial modelling, to identify areas with higher water stress. This evaluation allows us to prioritise actions in sites where water depletion poses a significant challenge. Our commitment to improving water consumption in these areas is reflected in the implementation of targeted efficiency measures, such as optimised water recycling, reduction initiatives, and adaptive management strategies.

3. Water Resources-related Actions and Implementation Resources

Section to disclose "Actions and resources related to water and marine resources" as determined in DR "E3-2" from ESRS regulation*.

At Vidrala, we carefully monitor water use and calculate the water intensity per tonne of melted glass. We have also defined specific targets to reduce water consumption through the implementation of initiatives and programmes aimed at optimising water use going forward. These include preparing a Water Management System, improving the quality of discharged water, optimising water treatment processes and raising purification standards.

Our Water Management Strategy incorporates this analysis to ensure responsible water use, particularly in areas facing high or very high water depletion risks. Based on risk financial modelling, we have mapped our facilities against varying levels of water scarcity, allowing us to define targeted actions to optimise water consumption, enhance treatment processes, and mitigate operational risks associated with water restrictions.

In line with these findings, we have established reduction targets and implemented measures such as rainwater harvesting, water recycling, and efficiency improvements to reduce our dependency on external water sources. Additionally, in regions subject to potential industrial water restrictions, such as Cataluña, we proactively manage consumption to minimise the impact of regulatory constraints.

We dedicate financial resources to initiatives aimed at reducing water consumption, minimizing wastewater discharge, and enhancing water treatment processes across our facilities. While these measures are already integrated into our current investment planning, we are committed to further refining our approach to assess and report these financial commitments transparently.

4. Water Targets

Section to disclose "Targets related to water and marine resources" as determined in DR "E3-3" from ESRS regulation*.

At Vidrala, we have implemented a Water Management System designed to drive continuous improvements in water efficiency. This system is focused on maximising efficiency, reducing environmental impacts, and mitigating risks associated with water use. As part of our commitment, we aim to reduce our water consumption by 50% by 2030, using 2018 as the baseline for our intensity usage as a voluntary target. To support this goal, we have also set specific reduction targets tailored to the communities where we operate, based in internal measurements and supported by technical knowledge and internal stakeholders.

To achieve our targets, we have implemented a state-of-the-art reporting system to monitor key variables, effectively manage equipment and facilities, and measure performance. These efforts reflect our commitment to responsible water management and to achieving the ambitious reductions we have set for 2030.

> As part of our commitment, we aim to reduce our water consumption by 50% by 2030, using 2018 as the baseline for our intensity usage. To support this goal, we have also set specific reduction targets tailored to the communities where we operate.

5. Water Consumption Performance

Section to disclose "Water Consumption" as determined in DR "E3-4" from ESRS regulation*.

Water is a fundamental element in our production process and without it is not possible to operate. There are 4 main water flows used throughout the production process, clearly distinguishing between closed-loop and open-loop systems. For instance, in the closed-loop flows, such as in the cullet rejection process and industrial water circuits, water is continuously recirculated and treated for reuse, thereby reducing the demand for fresh water. In contrast, open-loop circuits are exemplified by manufacturing consumption—which integrates water used for washing, rinsing, cooling, and other processes where water is used once and then discharged—and other open flows that include additional consumptive applications like cleaning and finishing operations.

At Vidrala, we carefully monitor water use and calculate the water intensity per tonne of melted glass. We have also defined specific targets to reduce water consumption through the implementation of initiatives and programmes aimed at optimising water use going forward. These include preparing a Water Management System, improving the quality of discharged water, optimising water treatment processes and raising purification standards. Water consumption meters are installed, with most sites volume being read on a monthly basis and reported to the environmental manager of Vidrala Group.

While absolute water consumption has increased due to operational changes, water intensity has improved significantly, reflecting enhanced efficiency measures. The reported water intensity ratio for 2024 shows a notable reduction compared to the previous year, driven by optimisation initiatives in production processes.

The water intensity ratio decreased by 16%, from 0.450 m³/tmg in 2023 to 0.377 m³/tmg in 2024, taking into account total m3 divided by tmg. Additionally, absolute water consumption saw a 9% reduction, decreasing from 1,188,199 m³ in 2023 to 1,086,657 m³ in 2024, despite an overall 9% increase in production volumes. Particularly in the glass sector and taking into account normalised data, total water consumption remained stable, increasing by only 1% despite a 3% rise in production, while the water intensity ratio improved by 2%, reaching 0.248 m³/tmg in 2024.

Water Consumption Data for Own Operations

	2023	2024		
			GLASS	BEVERAGES
Metrics	Volume (m³)	Volume (m³)	Volume (m³)	Volume (m³)
(a) Total water consumption	1,188,199	1,086,656	717,538	369,118
(b) Consumption in areas at water risk	NA	240,916	240,916	0
(c) Total water recycled and reused	**NA**	**251,963**	**250,799**	**1,164**

4.3.13 Biodiversity

In 2024, Vidrala Group approved the Biodiversity Policy to strengthen its commitment to protecting and sustainably managing ecosystems, which accountability is led by the Sustainability team and internally available for employees. This policy is structured around five key action lines:

- **Impact Assessment:** The implementation of continuous evaluations to identify and manage risks and opportunities related to biodiversity across all operations and facilities.
- **Value Chain Support:** The promotion of sustainable practices across the value chain, collaborating with suppliers and partners to minimise negative impacts on ecosystems, integrate biodiversity-focused initiatives, and foster a culture of environmental responsibility.
- **Active Restoration and Conservation:** Applying the mitigation hierarchy principle in line with the Science-Based Targets for Nature (SBTN) framework to avoid, minimise, restore, and compensate for environmental impacts, embedding these efforts into corporate operations and strategy.
- **Monitoring and Reporting:** Establishing metrics and tools to measure the impact of business activities on biodiversity. Annual progress will be disclosed in sustainability reports, supported by KPIs on the use and condition of natural resources.
- **External Collaboration:** Strengthening biodiversity protection through strategic partnerships and joint actions.

Preliminary analyses have identified potential impacts on local ecosystems and areas of biodiversity value within Vidrala's operations and value chain, particularly in regions where raw materials are sourced.

Vidrala operates multiple glass packaging production sites across Spain, Portugal, the United Kingdom, and Brazil, with key activities including melting, moulding, annealing, and quality control. Several of these facilities are located near biodiversity-sensitive areas, including protected forests, river basins, and designated conservation zones, necessitating careful environmental management. Assessments have identified that certain activities within these facilities have the potential to negatively affect local biodiversity, primarily due to emissions from high-temperature processes and raw material extraction, which may contribute to habitat degradation and impact air and water quality.

Impact assessments conducted at Vidrala's operational sites have revealed that locations such as Aiala Vidrio, Castellar Vidrio, and Elton are in proximity to protected natural areas, requiring careful mitigation strategies. Biodiversity-sensitive areas potentially impacted by Vidrala's operations include aquatic ecosystems such as the Nervión and Mersey rivers, which may be affected by industrial water discharge. Additionally, forested areas near the Santos Barosa plant in Portugal require ongoing monitoring to prevent further habitat degradation and biodiversity loss. Furthermore, material negative impacts on land have been identified, particularly in terms of land degradation and deforestation risks linked to infrastructure expansion and raw material sourcing.

To mitigate these risks, Vidrala has conducted assessments to evaluate how its operations affect biodiversity and ecosystems across its sites and value chain. Key risks include emissions affecting local air quality, potential contamination of nearby water bodies, and land use changes contributing to habitat loss. Efforts are underway to reduce these risks through enhanced environmental management strategies. We have a high dependency on key ecosystem services, particularly freshwater supply for industrial processes, and during 2024 we have implemented measures to improve water conservation and sustainable sourcing. Transition risks, such as increasing regulatory requirements on biodiversity protection, as well as physical risks like climate change-driven variations in water availability, have been assessed to ensure long-term operational resilience. Systemic risks, including the availability of raw materials, stricter biodiversity-related regulations, and reputational risks linked to unsustainable practices, are also integrated into Vidrala's biodiversity diagnosis and action plan.

We have conducted consultations with our environmental managers, particularly in environmentally sensitive regions, to address concerns regarding the impact of industrial activities on shared biological resources. Vidrala is conducting an initial mapping of critical areas and engaging with stakeholders, including local communities and suppliers, to develop its biodiversity action plan.. Specific site assessments have been carried out to evaluate potential negative impacts of raw material extraction and industrial operations on surrounding communities, focusing on issues such as land use, emissions control, and water consumption. As a first approach, local environmental managers have participated in materiality assessments to ensure their concerns are considered in biodiversity impact planning.

As part of its biodiversity management approach, Vidrala has adopted mitigation measures including habitat restoration, emission reduction strategies, and sustainable water resource management. As mentioned before, our biodiversity policy address material risks such as emissions management and sustainable production processes. This policy covers all operational sites, with particular focus on those located near sensitive areas. Additionally, Vidrala is working on improving traceability within its supply chain to ensure environmentally responsible sourcing.

Actions and resources allocated to biodiversity conservation include current analysis developed in other to elaborate a biodiversity action plan and the potential use of biodiversity offsets to compensate for unavoidable environmental impacts. We also track key environmental indicators related to biodiversity such as freshwater consumption, and industrial emissions, to ensure alignment with sustainability targets. In terms of financial implications, Vidrala is conducting assessments to estimate the economic impact of biodiversity-related risks. For certain disclosure requirements, a more exhaustive analysis will be conducted in 2025 to ensure comprehensive data collection and reporting on biodiversity dependencies, ecosystem services, and site-specific environmental performance.

Impact assessments have been conducted to evaluate how operations affect biodiversity and ecosystems. Key risks include emissions affecting air and it's quality and habitat disruption near manufacturing plants. Dependencies on ecosystem services such as water supply and forest cover regulation have been analysed, with measures implemented to reduce reliance and enhance sustainability. Transition risks, such as regulatory changes affecting environmental impact thresholds, and physical risks, including climate change effects on water availability, have been assessed and systemic risks, including the long-term sustainability of raw material sources and potential reputational risks from biodiversity-related issues, have been considered.

While further work is needed to prioritise key risks and dependencies, Vidrala is conducting an initial mapping of critical areas and engaging with stakeholders, including local communities and suppliers, to develop its biodiversity action plan. The company's approach will focus on contributing to biodiversity preservation, minimizing impacts on protected areas, and addressing dependencies on ecosystem services. Progress updates and finalised targets will be disclosed in 2025, ensuring alignment with international standards.

4.3.14 Resource use and circular economy

Glass as a material offers many benefits. Its high recyclability without loss of quality allows it to be used infinitely, which reduces demand for raw materials. Given its durable and resistant qualities, glass ensures protection against external contamination and provides a long useful life. By requiring less energy and generating fewer greenhouse gas emissions compared to production from virgin raw materials, it contributes to a more circular economy.

This set of characteristics, combined with the fact that it is made from natural and abundant raw materials, makes glass the most sustainable packaging material, in contrast to other materials derived from finite fossil fuels.

We believe in the possibility of transitioning from a linear to a circular economic model to ensure there are sufficient resources for everyone in the future. To this end, we are committed to avoiding excess material in our products, promoting recycling and reuse wherever feasible, and working decisively towards the total elimination of waste.

> Glass is an ecological material by nature: it is inert, 100% and infinitely recyclable, and recognised scientifically as the healthiest packaging material thanks to preserving the properties of food and drink

1. Material Impacts, Risks, and Opportunities related to Resource Use and Circular Economy

Section to disclose "Processes of the company to identify and assess material IRO related to Resource Use and Circular Economy" as determined in DR "E5-ESRS 2 IRO-1" from ESRS regulation*.

We firmly believe in the principles of sustainability and corporate responsibility. We are committed to identifying and addressing the material impacts, risks, and opportunities associated with our operations and value chain, especially with respect to potential circular economy related impacts. In compliance with the requirements, please refer to section Material IROs for Vidrala Group in this report.

Impact, risk and opportunity overview

Vidrala Group has made significant strides in promoting circular economy principles through the use of secondary raw materials, expanding recycling solutions in the supply chain, and reducing landfill waste. The increased use of cullet and other recycled materials has contributed to reducing reliance on virgin resources, supporting resource sustainability. Additionally, efforts to achieve zero waste to landfill and extend product life cycles have helped minimise environmental impacts. Product design improvements, both in manufacturing processes and end products, have also enhanced recyclability, aligning with Vidrala's broader sustainability initiatives. Furthermore, by decoupling business growth from resource demand, the company aims to reinforce transparency in decision-making and investor confidence while reducing its overall environmental footprint. These initiatives have been guided by assessments conducted by Vidrala's operational teams, ensuring alignment with current legislation and operational priorities. As a company whose core model is based on the use and continuous increase of glass cullet—a material with infinite recycling potential—Vidrala remains committed to enhancing its circular economy approach.

Despite these positive impacts, challenges remain in managing hazardous and non-hazardous waste disposal, which continues to pose environmental sustainability risks. The dependence on non-recycled and non-recyclable plastics in packaging contributes to resource scarcity, while the use of non-renewable raw materials such as sand and soda ash further strains natural reserves. Additionally, the improper disposal of operational waste materials has the potential to generate negative environmental and climate effects, highlighting the need for improved waste management strategies. Stakeholder consultations, primarily carried out through the assessments of Vidrala's operational teams and in strict adherence to existing regulations, have played a crucial role in identifying these challenges.

2. Policies related to resource use and circular economy

Section to disclose "Policies related to resource use and circular economy" as determined in DR "E5-1" from ESRS regulation*.

At Vidrala, the principles of the circular economy are integral to how we operate and are embedded in our production processes. Glass as a material offers many benefits. Its high recyclability without loss of quality allows it to be used infinitely, which reduces demand for raw materials. Given its durable and resistant qualities, glass ensures protection against external contamination and provides a long useful life. By requiring less energy and generating fewer greenhouse gas emissions compared to production from virgin raw materials, it contributes to a more circular economy.

While we are continuously evaluating ways to enhance our approach to circular economy practices, our operational model itself is a clear representation for of these principles. While we have not formalised a specific policy for the circular economy to date, we are evaluating the potential development of such a policy to further reinforce our commitment to this critical area. In the meantime, our ongoing operations, particularly our cullet management plan, serve as a practical demonstration of circular economy principles in action.

Circular economy principles have always been an integral part of Vidrala's operational model, guiding our approach to resource efficiency, waste reduction, and sustainable material use. As regulatory frameworks continue to evolve, we are assessing in 2025 how best to align our existing practices with emerging requirements, including the potential need for a more structured policy.

In addition, we have engaged with the European Commission to discuss the inclusion of a specific NACE code for hollow glass under the framework of the EU Taxonomy. These consultations underline our commitment to aligning with regulatory developments and ensuring that the unique contributions of our industry are recognised. Further details on this can be found in the Taxonomy section of this report.

Vidrala remains committed to promoting circularity through its operations and is actively exploring opportunities to further reinforce its practices as the regulatory landscape evolves. For now, our efforts remain focused on operational excellence and driving meaningful impact through the integration of circular economy principles into our core activities.

We have engaged with the European Commission to discuss the inclusion of a specific NACE code for hollow glass under the framework of the EU Taxonomy. These consultations underline our commitment to aligning with regulatory developments and ensuring that the unique contributions of our industry are recognised.

3. Actions and resources related to resource use and circular economy

Section to disclose "Actions and resources related to resource use and circular economy" as determined in DR "E5-2" from ESRS regulation*.

Vidrala Group is committed to optimising resource efficiency and integrating circular economy principles into its operations, as mentioned in previous sections. we have launched an action plan focused on increasing the use of recycled materials, improving raw material sourcing, and incorporating alternative materials to reduce environmental impact. This initiative is being implemented across all our manufacturing sites, involving key stakeholders such as suppliers, research institutions, and regulatory bodies.

We are making significant progress in enhancing circularity. The proportion of post-consumer cullet in our production continues to grow, reducing the need for virgin raw materials. The introduction of biomass slag allows us to incorporate industrial residues that would otherwise go to landfill, while materials such as Calumite and EP dust are being integrated into production.

4. Resource use and circular economy related Targets

Section to disclose "Targets related to resource use and circular economy" as determined in DR "E5-3" from ESRS regulation*.

Related to circular economy, our approach is guided by a dedicated Cullet Plan, which prioritises the maximisation of recycled glass (cullet) usage to reduce dependency on virgin raw materials such as sand and soda ash. This plan established a target of 66% by 2030 in our operations at Group level, reaching the maximum percentage of this materials in our furnaces as a voluntary commitment and set by internal experts based in internal analytical data and assessment of the international sector. This internal target was set in 2019 with a 47% rate of cullet. By continuously optimising cullet sourcing, we contribute to lowering our environmental footprint, decreasing extraction pressures on natural resources, and reducing overall energy consumption in glass production.

To track the effectiveness of our policies and actions, Vidrala has established clear targets related to resource use and circular economy principles. Our objectives include increasing the share of recycled and secondary materials in production, enhancing circular design principles, and progressively minimising the reliance on primary raw materials. Vidrala is actively implementing bottle lightweighting and rightweighting initiatives to reduce the overall material intensity of our products. By minimising the use of raw materials, we are designing lighter glass containers that maintain performance while significantly lowering the demand for virgin resources, aligning with circular economy principles by reducing environmental impact at every stage of the product lifecycle.

Related to waste, its management plays a crucial role in our circular economy strategy, as we seek to minimise waste generation, optimise material recovery, and reduce landfill disposal. Our waste-related targets focus on maximising the quantity of materials sent to valorisation treatments and aligning with the waste hierarchy by prioritising prevention, recycling, and recovery. This includes initiatives to enhance the recycled content in our products and improve waste segregation at production sites.

5. Resource Inflows Related to Material Impacts, Risks, and Opportunities

Section to disclose "Resource Inflows" as determined in DR "E5-4" from ESRS regulation*.

Glass is manufactured from natural and abundant raw materials such as silica sand, soda and, most significantly, recycled glass. During the glassmaking process, these elements are melted at high temperatures in our furnaces. The greater the proportion of recycled glass we can incorporate into the manufacturing process, the less dependent we are on the extraction of these essential elements from our planet. The end product can be endlessly recycled without sacrificing quality, which makes our decision to up the amount of recycled glass in our manufacturing process an appealing option. On doing so, we reduce our dependence on virgin raw material extraction, we scale back our energy usage and greenhouse gas emissions, and we contribute towards building a circular economy. Our commitment to manufacturing glass containers with the highest possible percentage of recycled glass has been realised in this exercise through a of incorporation of 53% recycled glass (over total melted tons).

Resource inflow

	2023	2024
E5-4 Consumption of raw materials	2,932,625	3,162,770
E5-4 The absolute weight of secondary reused or recycled components, [...] - Glass Components	1,314,684	1,538,432
E5-4 Percentage of secondary reused or recycled components, secondary intermediary products and secondary materials	49.83 %	53.41 %

In line with the CSRD requirements, we report our material resource inflows with a focus on increasing the share of recycled materials while maintaining high production efficiency. In 2024, the absolute consumption of raw materials increased by 8%, reaching 3,162,770 tonnes; however, in relative terms, the intensity per tonne of melted glass slightly decreased by 1%, demonstrating improvements in efficiency. Our reliance on secondary reused or recycled components, particularly glass cullet, has grown significantly, with an absolute increase of 17% compared to 2023, reaching 1,538,432 tonnes. This aligns with our continuous efforts to integrate higher levels of recycled content into our production cycle.

The proportion of secondary materials used in our operations has also increased, with the percentage of secondary reused or recycled components, intermediary products, and secondary materials rising from 44.83% in 2023 to 48.64% in 2024, representing a 9% improvement. When considering losses due to combustion, the reported cullet ratio stands at 53.41%, reflecting a 7% increase from the previous year. These figures highlight our strategic approach to resource conservation, reinforcing Vidrala's role in minimising dependence on virgin raw materials. Our methodology ensures accuracy in reporting by dividing the total cullet by the tonnes of melted glass, avoiding double counting and adhering to regulatory standards.

In our packaging process for manufacturing our products, at Vidrala we focus on sustainable solutions by using reusable systems. We use pallets across all business units in country-specific deposit, return, and recovery pools, and over 70% of our production employs returnable separators. Our cardboard is produced using 50–80% recycled paper (varying by business unit), and our plastics currently incorporate 30% PCR—with a future target to standardise this across all units. Additionally, we are implementing circularity projects in every plant to transform plastic waste into reusable production material, and we work closely with our suppliers to explore and develop new sustainable packaging materials.

Our reliance on secondary reused or recycled components, particularly glass cullet, has grown significantly, with an absolute increase of 17% compared to 2023, reaching 1,538,432 tonnes.

6. Resource Outflows Related to Material Impacts, Risks, and Opportunities

Section to disclose "Resource Outflows" as determined in DR "E5-5" from ESRS regulation*.

At Vidrala, waste management is governed by the applicable norms and laws at each of our factories. Our main focus is to prevent waste generation, minimizing waste as much as possible in each of our processes. To achieve this, we have identified the waste generated in our production process and its corresponding subprocesses.

Our approach aligns with the European Waste Framework Directive (2008/98/EC, amended 2018), incorporating systematic waste identification, prevention, minimisation, valorisation, and controlled disposal when necessary. Through structured waste management practices, we strive to reduce environmental impact while maximizing material recovery across all our production sites.

A fundamental aspect of our waste management strategy is the precise identification of waste streams at every stage of our manufacturing process. Each production unit undergoes a detailed waste mapping exercise to classify and quantify waste based on:

- Type of waste (e.g., glass cullet, refractory materials, sludge, gas treatment residues, hazardous substances)
- Source of generation (e.g., batch preparation, melting, forming, finishing, quality control)
- Chemical and physical properties (determining reusability and treatment options)
- Environmental risk factors (e.g., contamination potential, hazardous content)

When waste minimisation is not possible, we prepare our waste to be valorised, either within our process or outside our facilities. We collaborate with waste managers who help us find the best treatment method, aligned with our zero waste to landfill policy.

In accordance with the waste hierarchy, our primary goal is to prevent waste generation through material efficiency, process optimisation, and design improvements. Key initiatives include:

- Process Optimisation: Implementing lean manufacturing principles to minimise material losses at each stage.
- Glass Reuse and Recovery: Maximizing internal glass cullet recycling to reduce raw material dependency.
- Byproduct Integration: Identifying opportunities to reuse production waste as secondary raw materials, such as dehydrated glass rejection sludge being reincorporated as a flux in our furnaces.
- Advanced Filtration and Separation Technologies: Reducing process contaminants, allowing for higher rates of material reuse.

The integration of real-time monitoring systems for waste generation further enhances efficiency, enabling predictive analytics to reduce waste at the source.

Additionally, we have specific facilities to reduce the volume of waste to be managed. For example, we dehydrate glass rejection sludge, which we then reincorporate into our process as a flux. We also reuse the waste from gas treatment as a substitute for pure sulphate. Furthermore, we collaborate with other industries to incorporate their waste into our production, such as biomass slag in our project with Acciona.

When there are no technical options available for valorisation, we manage our waste through other treatments. For hazardous waste, strict protocols are in place to ensure safe handling, storage, and disposal:

- Risk Assessment and Identification: Evaluating hazardous components (e.g., heavy metals in furnace dust, waste oils, critical raw materials).
- Specialised Containment and Storage: Dedicated hazardous waste storage facilities ensure containment before treatment.
- Licensed Treatment and Disposal Partners: Working with certified waste treatment providers to ensure compliance with disposal regulations.

As proof of the effectiveness of our system, we have obtained the zero waste certification from Aenor, which verifies the amount of waste valorised and avoided from being sent to landfill. This certification will be extended to the rest of the group's plants as we implement the Waste Management System under the ISO 14001 standard.

Resource outflows

Waste

Type of Waste

Particulars of waste generated	Type	Quantity (kgs)
Total amount of waste generated	-	40,676,875
Hazardous Waste directed to disposal	Incineration	2,044,183
Hazardous Waste directed to disposal	Landfill	2,107,110
Hazardous Waste directed to disposal	Other disposal operations	467,780
Hazardous Waste directed to disposal	Recycled	1,704,816
Non-Hazardous Waste directed to disposal	Incineration	10,931,629
Non-Hazardous Waste directed to disposal	Landfill	9,525,329
Non-Hazardous Waste directed to disposal	Other disposal operations	43,520
Non-Hazardous Waste directed to disposal	Recycled	13,852,508
Amount and percentage of non-recycled waste	Weight	25,119,551
	%	1

There is no resource outflow of radioactive waste

4.3.15 EU Taxonomy Environment

1. Our view of the EU Taxonomy

The European Green Deal is an EU-led strategy aimed at promoting sustainability and tackling climate change. Through implementation of this strategy, the goal is to attain climate neutrality by 2050, foster the use of renewable energies and encourage sustainable practices.

One of the ways devised by the EU to help meet these targets is through its Sustainable Finance Action Plan, which, among other things, seeks to establish a unified EU-wide classification system of sustainable economic activities (known as the EU Taxonomy).

To that end, a common framework is needed to define which activities can be classified as sustainable, and what the criteria are to achieve this. In response, the EU has laid down its Taxonomy Regulation.

The Taxonomy Regulation sets out six sustainability objectives:

- Climate change mitigation,
- Climate change adaptation,
- Sustainable use and protection of water and marine resources,
- Transition to a circular economy,
- Pollution prevention and control,
- Protection and restoration of biodiversity and ecosystems.

However, determining whether a company's activities fit with some of the sustainability objectives is not sufficient; it is also necessary to look at the Implementing Regulations in order to be sure that they meet the established criteria. In other words, apart from being eligible, an activity also has to be aligned with the technical requirements so as to demonstrate that it makes a relevant contribution to meeting the objectives.

For non-financial undertakings, the Taxonomy sets out three key performance indicators (KPIs). These KPIs are ratios based on the turnover, CapEx and OpEx associated with a company's activity over the course of a year.

The KPIs reflect the extent to which a company's activities are potentially sustainable (eligible); and, within these activities, what proportion of them meet the Regulation's technical screening criteria and can therefore be considered as truly sustainable (aligned).

Current regulatory framework is defined by the following rules:

- Regulation (EU) 2020/852 on the establishment of criteria to determine whether an economic activity qualities as environmentally sustainable. Article 8 of Regulation (EU) 2020/852 required the EU Commission to adopt a delegated act on disclosure to specify the content and presentation of the information to be disclosed. As of 1 January 2023, the Delegated Act shall apply in full to non-financial undertakings for the 2022 reporting period.

- Delegated Act (EU) 2021/2139 (Delegated Act on Climate) establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives.

Amended for the introduction of economic activities in the nuclear and natural gas sectors by Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

- Delegated Regulation (EU) 2021/2178 specifying the content and presentation of information to be disclosed and specifying the methodology to comply with the regulation.

The Taxonomy Regulation is being introduced in stages, with the environmental objectives regarding climate change mitigation and climate change adaption being applicable first.

Disclosure requirements:

In accordance with Article 8 of Regulation (EU) 2020/852, in 2021 non-financial undertakings disclosed the eligibility of the proportion of their turnover, capital expenditure (CapEx) and operating expenditure (OpEx) that met the criteria set by the European Union. In 2024, companies are also required to report on the proportion of these KPIs considered aligned in terms of the climate change mitigation and climate change adaptation objectives; for the remaining objectives, the eligibility of the KPIs listed above should be reported.

Furthermore, issuers are required to disclose relevant information on the accounting policy, the methodology used to calculate these KPIs and qualitative details that support the understanding of these KPIs.

Nuclear energy related activities

1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No

Fossil gas related activities

4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

Scope:

Annex 1 to Regulation (EU) 2020/852 was used to define the scope of activities to which Vidrala's business could be aligned.

2. Our eligibility

The eligibility of an activity is based on its similarity to the descriptions detailed in Delegated Regulation (EU) 2021/2139, which establishes the technical screening criteria and requirements for each environmental objective. These descriptions are linked to a series of associated NACE codes, which help determine eligibility by identifying activities associated with the descriptions in the regulation's annexes.

Thanks to a better understanding of the Taxonomy Regulation (Regulation (EU) 2020/852) and its applicability to the Group's economic activities, the data reported in 2022 has been revised and updated.

The following is the result of a detailed analysis of the eligibility of our activities in accordance with the criteria established by the Taxonomy:

- 7.2 Renovation of existing buildings (CCM)
- 7.3 Installation, maintenance and repair of energy efficiency equipment (CCM)
- 7.5 Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling the energy performance of buildings (CCM)
- 7.6 Installation, maintenance and repair of renewable energy technologies (CCM)
- 8.1 Data processing, hosting and related activities (CCM)
- 9.1 Close to market research, development and innovation (CCM)
- 5.1 Repair, renovation and remanufacturing (CE)

Taxonomy is an evolving framework. In recent years, there has been continuous development of new legislation and guidelines in this context. This exposes companies to an environment of uncertainty, forcing them to adapt to new requirements and guidelines.

Among these guidelines, the communications from the European Commission regarding the resolution of frequently asked questions about the Taxonomy (FAQs) stand out, aiming to facilitate the interpretation and application of this framework.

In this context, FAQ 4 of the compilation document of FAQs dated November 29, 2014, conditions the eligibility of certain activities - those listed in sections 5.1 to 5.6 of Annex II of the Environmental Delegated Act, which includes the activity reported by Vidrala in the previous year concerning the circular economy objective (activity 5.1.) - to their correspondence with the NACE codes listed in the description of these activities. Among the codes referred to in activity 5.1., the one corresponding to Vidrala's activity is not found, which has necessitated a review of last year's reporting criteria.

In November 2024, a consult was sent to the EU Commission seeking clarification regarding the relation to the Circular Economy activities listed under Section 5.1. The concern was that NACE Code 23.1 (manufacture of glass and glass product), which encompasses activities critical to the production of recycled glass cullet, is not explicitly referenced as a taxonomy-eligible activity under this section. Given the pivotal role of recycled glass in promoting circularity and reducing waste, this omission raises significant challenges in demonstrating the sustainability and circularity of the glass industry, despite its alignment with the EU's Circular Economy objectives.

The FAQs published leaves ambiguity as to why certain activities central to the circular economy, such as ours, are excluded. This exclusion could impede our ability to categorise recycled glass cullet as taxonomy-eligible products, potentially limiting access to sustainable financing crucial for advancing the circular economy within the glass sector. Furthermore, it appears to contrast with the broader objectives of the EU Green Deal and Circular Economy Action Plan, which emphasise waste reduction and the increased use of secondary materials.

According to the European Commission's FAQs, the 2023 results must be restated. Thus, the official tables of the European Commission will show the figures for the 2024 and 2023 fiscal years according to the FAQ criteria, and in the following table, the comparison of how they would look considering that the query made is accepted and, therefore, activity 5.1 can be considered potentially eligible.

		RESULTS 2024			RESULTS 2023		
		TURNOVER	CAPEX	OPEX	TURNOVER	CAPEX	OPEX
Sectorial Scenario	Eligible	– %			– %	32.2 %	20.7 %
	Aligned	– %			– %	1.1 %	– %
Restrictive Scenario	Eligible	– %			– %	11.6 %	4.2 %
	Aligned	– %			– %	1.1 %	– %

Vidrala will continue to review the reporting criteria on an annual basis, ensuring the accuracy and quality of the information and ensuring that disclosures coincide with the scope of the consolidated annual accounts.

As a result of our commitment to sustainability, we expect to be able to include new environmental objectives going forward and thus expand the Taxonomy.

3. Our alignment

Considering the requirements set out in the Taxonomy regulation of the Delegated Climate Act (Regulation 2021/2139) for 2024, we have conducted a comprehensive analysis of operations to assess the degree of compliance with the criteria required by the Taxonomy in relation to the alignment of eligible activities to the mitigation objective. However, due to the complexity in compiling certain technical criteria, which are highly dependent on obtaining information on suppliers, it has not been possible to carry out this process in full. We have therefore decided to continue working on this aspect throughout the year 2024, and we expect to be able to provide realistic alignment percentages for the company in the next report.

As a precaution, this year we have set Vidrala's alignment at 0% for activities related to the mitigation target.

Meeting the Minimum Social Safeguards:

Meeting the Social Minimum Safeguards implies that a company, in the context of the Taxonomy and sustainability-related regulations, is adopting practices and policies that protect and foster human rights and social welfare. These safeguards are designed to ensure that economic activities are not only sustainable from an environmental point of view, but also from a social perspective.

Our commitment to the Minimum Social Safeguards at Vidrala is evident through:

Human rights management:

In 2022, the Vidrala Group developed its own human rights policy based on the Modern Slavery Act 2015 and International Treaties and Conventions, in particular the United Nations Universal Declaration of Human Rights. It includes the steps that Vidrala has taken and continues to take to ensure that modern slavery and human trafficking are not present within its business or supply chain. The commitment to developing policies that integrate equal treatment and opportunities among employees, without direct or indirect discrimination on grounds of race, gender, nationality, language, origin, personal deeply held beliefs, marital status or health, applies from recruitment to promotion, as well as salary policy, training, working conditions, occupational health, organisation of working time and the work-life balance. Moreover, there is a monitoring system in place, the aim of which is to ensure that the stated equality objectives are met, and to make sure communication procedures are established to announce the decisions, plans and measures adopted, as well as to report on progress made.

This policy, like the Code of Conduct approved in 2019, is available to all employees via the corporate intranet. In addition, our Code of Conduct acts as a guiding light for all activities. One of its cornerstones is a zero-tolerance stance towards corruption and bribery, among other offences. The Code is conveyed to new employees and updated annually.

The Vidrala Group ensures that its suppliers accept the Supplier Code of Conduct, approved in 2022, when registering as a new supplier. This Code sets out the human rights compliance framework that each supplier must accept, as well as their acceptance to being audited on this and other issues. The Quality Department is responsible for carrying out supplier audits, as explained in this report.

At least once a year the Audit Committee is informed of any human rights violations. No violations in this regard were registered in 2024.

Fair competition

At Vidrala, we are guided by a corporate culture where ethics and regulatory compliance are fundamental pillars. To achieve this, we have implemented a robust system that includes:

- Compliance culture: We promote transparency and ethics in all our business interactions, supported by our Anti-Corruption, Fraud and Competition Defense Policy and our Code of Conduct.
- Continuous monitoring and improvement: We have not had any legal actions related to anti-competitive behaviour in 2023 and, in the past fiscal year, we implemented a new whistleblowing channel to guarantee confidentiality and anonymity.
- Comprehensive training: We train all employees on the Anti-Corruption, Fraud and Competition Defense Policy and the Code of Conduct.

We believe that fair competition is fundamental to Vidrala's sustainable success. By fostering this culture of compliance and transparency, we contribute to a more equitable and beneficial market for all. This allows us to protect our customers, ensure equal opportunities and strengthen trust in our company.

Anti-corruption and antitrust:

We do not tolerate any violations of our anti-corruption, anti-bribery and ethical policies and we are committed to addressing any incidents that do. Our Anti-Corruption and Antitrust Policy, approved in 2020, sets out the applicable regulations, to whom the policy applies, the basic general principles and the channel to communicate suspicions regarding or clear violations of the policy. We ensure that all our employees are trained on these matters. Our Code of Conduct is conveyed to all new employees and is available via the corporate intranet. It is also regularly sent to current employees by email. We also have software that identifies and investigates any suspicious behaviour involving purchases and payments in order to minimise potential risks in this area. As part of the internal audit plan, a continuous audit is carried out that involves the purchasing, invoicing and treasury processes to detect possible fraud and process improvements.

Our Anti-Corruption and Antitrust Policy also addresses the issue of anti-competitive behaviour. Once again, there were no infringements recorded or legal action brought in respect of anti-competitive behaviour or violations this year.

In 2024, the Vidrala Group continued to use the Whistleblowing Channel it created in 2022, in compliance with current legislation in this regard set out in European Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and its transposition into the legislation of the countries in which the Vidrala Group operates. Its aim is to ensure confidentiality around the complaint, thereby guaranteeing anonymity. This Whistleblowing Channel and its management policy can be consulted at:

https://vidralawhistleblowing.integrityline.com/forntpage

Tax:

The Group's tax policy is focused on ensuring compliance with the prevailing tax legislation in all jurisdictions in which the Company operates. This is in line with the nature of the activity performed in each of these territories. Vidrala relies on specialist external advice to constantly assess and manage tax-related risks in the jurisdictions where it operates.

Accounting methodology and policy:

An assessment was carried out on the allocation of income or expenses to the various economic activities using management information. This is the basis for calculating turnover, CapEx and OpEx.

- **Turnover**

The assessment of turnover, in accordance with paragraph 2 a) of Article 8 of Regulation (EU) 2020/852, is carried out by calculating the numerator, represented by the proportion of net turnover linked to activities aligned with the Taxonomy, and the denominator, which is represented by the total net turnover as defined in Directive 2013/34/EU.

- **CAPEX**

To calculate the proportion of CapEx, the provisions of Delegated Regulation 2021/2178 are taken into consideration.

The denominator covers additions to tangible and intangible assets during the financial year considered before depreciation, amortisation and any remeasurements, including those resulting from revaluations and impairments, for the relevant financial year and excluding fair value changes. Vidrala applies International Financial Reporting Standards (IFRS) and country-level generally accepted accounting principles (GAAP). The denominator figures can be found in the consolidated accounts. Additions to fixed assets exclude additions to intangible assets for emission allowances.

To calculate the proportion of CapEx, the provisions of Delegated Regulation 2021/2178 are taken into consideration. Accordingly, items corresponding to the proportion of investments in fixed assets, i.e. tangible and intangible assets during the period in question, have been included before taking into consideration depreciation, amortisation and possible revaluations. The indicator, on applying International Financial Reporting Standards (IFRS) as adopted by Regulation (EC) No 1126/2008, consists of costs that are accounted for pursuant to:

- IAS 16 Property, Plant and Equipment, paragraph 73, (e), points (i) and (iii);
- IAS 38 Intangible Assets, paragraph 118, (e), point (i);
- IAS 40 Investment Property, paragraph 76, (a) and (b) (for the fair value model);
- IFRS 16 Leases, paragraph 53, (h).

Leases that do not lead to the recognition of a right-of-use over the asset are not taken into consideration.

The numerator is equal to the proportion of CapEx included in the denominator, which corresponds to assets or processes associated with Taxonomy-aligned economic activities. To avoid any double counting in the allocation, each investment in economic activities has a unique identifier known as a WBS and sub-WBS.

- **OPEX**

The denominator covers direct non-capitalised costs that relate to research and development, building renovation measures, short-term leases, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment by the undertaking or third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets.

Vidrala has a specific code to identify all OpEx items considered sustainable that meet this definition.

These metrics have been calculated taking into account the distinctive features of the integrated process and its implications for the current year's sales and financial operations, thus ensuring the accuracy and relevance of the indicators in the context of the Taxonomy and sustainability objectives.

See below the results of the analysis.

				Substantial Contribution Criteria						Criteria for NDSH									
Economic Activities (1)	Codes (2)	CapEx absolute (3)	CapEx proportion (4)	Mitigation to climate change (5)	Adaptation to climate change (6)	Marine and hydric resources management (7)	Circular Economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Mitigation to climate change (11)	Adaptation to climate change (12)	Marine and hydric resources management (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Proportion of the CapEx that adjusts to the taxonomy, year N-1(18)	Category (enabling activity) (19)	Category (transitional activity) (20)
		EUR	(%)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(%)	(E)	(T)
A. ACTIVITIES ELIGIBLES ACCORDING THE TAXONOMY																			
A.1 ACTIVIDADES MEDIOAMBIENTALMENTE SOSTENIBLES (que se ajustan a la taxonomía)																			
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0 €	–%	N	N/EL	N/EL	N/EL	N/EL	N/EL	Y	N	Y	Y	Y	Y	Y	0.011		
CapEX of the environmentally sustainable activities (A.1.)		0 €	0	N	N/EL	N/EL	N/EL	N/EL	N/EL	Y	N	Y	Y	Y	Y	Y	0.011		
Of which: facilitators		0 €	0	N	N/EL	N/EL	N/EL	N/EL	N/EL	Y	N	Y	Y	Y	Y	Y	0.011	E	
Of which: transitional		0 €	0	0												Y	0		T
A.2. ELIGIBLE ACTIVITIES ACCORDING THE TAXONOMY BUT NOT ENVIRONMENTALLY SUSTAINABLE (not taxonomy aligned)																			
Renewal of water collection, treatment and supply systems	CCM 5.1	0 €	–%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.003		
Constructions of new buildings	CCM 7.1	495 €	0.2%	EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Renovation of existing buildings	CCM 7.2	4,681 €	2.1%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.054		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	370 €	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.003		
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	0 €	–%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.00003		
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	1,558 €	0.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.044		
Close to market research, development and innovation	CCM 9.1	217 €	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.001		
Repair, refurbishment and remanufacturing	EC 5.1	0 €	–%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.206		
CapEX of eligible activities according the taxonomy but not environmentally sustainable activities (A.2.)		7,321 €	3.3%	3.3%	–	–	–%	–	–								0.311		
TOTAL (A.1. + A.2.)		7,321 €	3.3%	3.3%	–	–	–%	–	–								0.322		

B. ACTIVITIES NON ELIGIBLES ACCORDING THE TAXONOMY			
CapEx of not eligibile according to the taxonomy		212,190 €	96.7%
TOTAL (A+B)		**219,511 €**	**100.0%**

				Substantial Contribution Criteria						Criteria for NDSH									
Economic Activities (1)	Codes (2)	OpEx absolute (3)	OpEx proportion (4)	Mitigation to climate change (5)	Adaptation to climate change (6)	Marine and hydric resources management (7)	Circular Economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Mitigation to climate change (11)	Adaptation to climate change (12)	Marine and hydric resources management (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum guarantees (17)	Proportion of the OpEx that adjusts to the taxonomy, year N-1(18)	Category (enabling activity) (19)	Category (transitional activity) (20)
		EUR	(%)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(%)	(E)	(T)
A. ACTIVITIES ELIGIBLES ACCORDING THE TAXONOMY																			
A.1 ENVIRONMENTALLY SUSTAINABLE ACTIVITIES																			
OpEx of the environmentally sustainable activities (A.1.)			–%														0		
A.2 ELIGIBLE ACTIVITIES ACCORDING THE TAXONOMY BUT NOT ENVIRONMENTALLY SUSTAINABLE																			
Renovation of existing buildings	CCM 7.2	0 €	–%	EL	N/EL	N/EL	N/EL	EL	N/EL								0.026		
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	74 €	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.001		
Data processing, hosting and related activities	CCM 8.1	60 €	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.004		
Close to market research, development and innovation	CCM 9.1	0 €	–%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.011		
Repair, refurbishment and remanufacturing	EC 5.1	0 €	–%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.166		
OpEx eligible activities according taxonomy but not environmentally sustainable activities (A.2)		134 €	0.3%	0.003	0	0	0	0	0								0.208		
TOTAL (A.1. + A.2.)		134 €	0.3%	0.003	0	0	0	0	0								0.208		

B. ACTIVITIES NON ELIGIBLES ACCORDING THE TAXONOMY			
OpEx not eligible activities according to the taxonomy		49.547 €	99.7%
TOTAL (A+B)		**49.682 €**	**100.0%**

				Substantial Contribution Criteria						Criteria for NDSH									
Economic Activities (1)	Codes (2)	Absolute Turnover (3)	Proportion of turnover(4)	Climate change Mitigation (5)	Climate change Adaptation (6)	Water and marine resources (7)	Circular Economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change Mitigation (11)	Climate change Adaptation (12)	Water and Marine Resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Proportion of the turnover that adjusts to the taxonomy year N-1(18)	Category (enabling activity) (19)	Category (transitional activity) (20)
		EUR	(%)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y, N, N/EL)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(Y/ N)	(%)	(E)	(T)
A.TAXONOMY ELIGIBLE ACTIVITIES																			
A.1 ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (taxonomy - aligned)																			
Turnover of environmentally sustainable activities (taxonomy-aligned) (A.1.)			–%														0		
A.2 Turnover of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)																			
Repair, refurbishment and remanufacturing	CE 5.1	0 €	–%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.471		
Turnover of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		0 €	–%	0	0	0	0	0	0								0.471		
TOTAL (A.1. + A.2.)		0,00 €	–%	0	0	0	0	0	0								0.471		

B. TAXONOMY-NON-ELIGIBLE ACTIVITIES			
Turnover of taxonomy-non-eligible activities		1.619.364,00 €	100.0%
TOTAL (A+B)		**1.619.364,00 €**	**100.0%**

		CAPEX / TOTAL CAPEX RATIO	
		that adapts to the taxonomy by objective	eligible according to taxonomy by objective
Climate change Mitigation	CCM	– %	3.3 %
Climate change Adaptation	CA	– %	– %
Marine and water resources	WTR	– %	– %
Circular economy	CE	– %	– %
Pollution	PPC	– %	– %
Biodiversity and ecosystems	BIO	– %	– %

		OPEX / TOTAL OPEX RATIO	
		that adapts to the taxonomy by objective	eligible according to taxonomy by objective
Climate change Mitigation	CCM	– %	0.27 %
Climate change Adaptation	CA	– %	– %
Marine and water resources	WTR	– %	– %
Circular economy	CE	– %	– %
Pollution	PPC	– %	– %
Biodiversity and ecosystems	BIO	– %	– %

		TURNOVER / TOTAL TURNOVER RATIO	
		that adapts to the taxonomy by objective	eligible according to taxonomy by objective
Climate change Mitigation	CCM	– %	– %
Climate change Adaptation	CA	– %	– %
Marine and water resources	WTR	– %	– %
Circular economy	CE	– %	– %
Pollution	PPC	– %	– %
Biodiversity and ecosystems	BIO	– %	– %

4.3.16 Our People Engagement and Strategy

Section to disclose "Interests and views of stakeholders" as determined in DR "S1-ESRS 2-SBM 2" from ESRS regulation*.

At Vidrala, we recognise that our people are the backbone of our operations and also critical drivers of our sustainability journey. We are deeply committed to fostering active engagement with our team and ensuring their interests and insights are fully integrated into our business strategy. Our success is intrinsically tied to the employee experience, well-being and personal & professional growth, and we continually strive to create an inclusive and collaborative environment that promotes innovation and mutual respect.

To achieve this, Vidrala has implemented a variety of employee engagement initiatives, including open-door policies, structured and informal feedback mechanisms, regular surveys, focus groups, bidirectional communication and town hall meetings. These platforms encourage transparent communication, helping us gain a deeper understanding of our people perspectives, aspirations, and challenges. We place a strong emphasis on listening to our employees at every level, ensuring that their contributions help shape the decisions that drive our business forward.

> Our success is intrinsically tied to the employee experience, well-being and personal & professional growth, and we continually strive to create an inclusive and collaborative environment that promotes innovation and mutual respect.

(a) Team Engagement Description:

i. **Key Stakeholder:** Vidrala's most valuable stakeholders are our employees—dedicated professionals across diverse roles and functions, who are integral to our operational excellence and sustainability journey.

ii. **Categories of Engagement:** Vidrala actively involves employees at all organisational levels, from the shop floor and operations teams to senior management, to ensure that a diverse range of viewpoints is incorporated into the decision-making process.

iii. **Organisational Structure:** Vidrala's People department leads our employees engagement initiatives, collaborating closely with sustainability and the other core areas to ensure alignment with broader business and sustainability strategies.

iv. **Purpose of Engagement:** The primary goal of engaging with our people is to understand their needs, concerns, and aspirations in order to improve our value proposal, thereby enabling us to enhance workplace experiences, foster well-being, and drive professional growth, among others.

v. **Outcome Integration:** Insights gained through engagement are critical in shaping Vidrala's HR policies, employee development programs, and sustainability practices, ensuring that our people remain at the centre of our business strategy.

(b) Understanding Team Views:

In alignment with our materiality assessment process (referencing Disclosure Requirement IRO-1), Vidrala conducts comprehensive analyses to capture employees' perspectives. These analyses provide valuable insights into expectations related to work-life balance, career development, training opportunities, workplace safety, and overall job satisfaction. This continuous dialogue ensures that employee needs are effectively addressed in our strategy and operations.

(c) Adapting Strategy and Business Model:

i. **Addressing Team Interests:** Vidrala is committed to evolving our strategy and business model to reflect the priorities aligning Corporate & People priorities. Key focus areas include enhancing employee benefits, improving workplace safety measures, increasing inclusivity, and providing clear pathways for career progression.

ii. **Planned Steps and Timeline:** As part of this commitment, Vidrala is continuously improving in our Employee Experience and People Development. This spirit will outline specific programs aimed at improving employee satisfaction and fostering professional growth.

iii. **Impact on Team Relationship:** These efforts aim to deepen our connection with employees, fostering higher engagement levels, increased retention, and a shared sense of purpose that aligns with Vidrala's sustainability goals.

(d) Informing Administrative, Management, and Supervisory Bodies:

At Vidrala, we ensure that our leadership, including administrative, management, and supervisory level, is well-informed about the interests and concerns of our people. Regular updates are provided through detailed reports, presentations, and summaries of employee feedback, enabling decision-makers to integrate these perspectives into socially responsible and sustainable strategies.

Material Impact Risks and Opportunities and their interaction with strategy and business model

Section to disclose "Material impacts, risks and opportunities and their interaction with strategy and business model" as determined in DR "S1-ESRS 2-SBM 3" from ESRS regulation*.

Vidrala acknowledges that the actual and potential impacts on its people, as outlined in ESRS 2 IRO-1 (processes to identify and assess material impacts, risks, and opportunities), are directly connected to its strategic approach and business model. We firmly believe in the principles of sustainability and corporate responsibility. We are committed to identifying and addressing the material impacts, risks, and opportunities associated with our operations and value chain, especially with respect to potential employee-related impacts. In compliance with the requirements, please refer to section Material IROs for Vidrala Group in this report for further information.

Vidrala recognises the intrinsic link between material risks and opportunities stemming from its and its business strategy. By identifying and understanding these risks and opportunities, the company implements targeted measures to mitigate negative effects while leveraging positive impacts to drive sustainable growth.

All employees who have an employment relationship with Vidrala are included under the analysis.

General processes for employee engagement

We engage with our employees both directly and indirectly through various processes to assess and address potential risks related to specific roles, work environments, or individual characteristics. One of our key feedback mechanisms is our participation in the Great Place to Work rating, where employees evaluate workplace conditions, including health and safety, training opportunities, and overall well-being.

Additionally, we collect insights through training requests and feedback from health & safety programmes, ensuring that employees in higher-risk roles or specific contexts receive targeted support and mitigation measures. We also engage with workers' representatives across our operations, fostering continuous dialogue to improve working conditions and identify areas for improvement.

The IROs assessed in the employee section have emerged from the analysis of these interactions, providing a structured understanding of material impacts. These findings have been reviewed and validated by management and employee leadership functions, ensuring that they accurately reflect workplace realities and guide effective decision-making.

Material impacts, risks and opportunities (IROs)

Based on the material IROs identified for Vidrala's employees, the company has recognised several positive and negative impacts associated with its operations and employee management.

Among the positive impacts, Vidrala's commitment to work-life balance and flexibility measures for family reasons contribute significantly to employee well-being and retention. The company's promotion of social dialogue ensures that employees have a voice in shaping their working conditions, reinforcing engagement and productivity. Moreover, permanent contracts enhance job security, reducing turnover and fostering long-term employee commitment.

Diversity and inclusion initiatives, such as enhancing the integration of women and persons with disabilities, strengthen Vidrala's commitment to equal opportunities. Likewise, efforts to increase female representation in leadership roles and recruit underrepresented groups contribute to cultural change and greater workforce inclusivity. Additionally, the company's investment in employee health and well-being, through occupational safety and mental health support, ensures a healthy and productive work environment.

However, certain negative impacts have been identified, requiring continuous mitigation efforts. Risks related to workplace safety, highlight the importance of maintaining robust health and safety measures. Concerns regarding gender discrimination in career opportunities and data privacy risks further emphasise the need for strong internal policies and regulatory compliance.

As Vidrala transitions towards greener and climate-neutral operations, it addresses how its plans impact its employees. This includes actions related to restructuring, employment changes, and opportunities for job creation or workforce development through reskilling initiatives. We are currently evaluating direct impact links arising from Vidrala's transition plans that may affect our employees. Meanwhile, we are focused on equipping employees with the skills needed to adapt to technological advancements and evolving industry requirements.

> At Vidrala, certain risks and opportunities identified in our workforce assessment are particularly relevant to specific employee groups, notably in gender equality, financial compensation, and workplace inclusivity.

At Vidrala, certain risks and opportunities identified in our workforce assessment are particularly relevant to specific employee groups, notably in gender equality, financial compensation, and workplace inclusivity. Focused on gender pay gap, this identified risk is directly attributable to the distribution of job roles, as women tend to occupy positions of lower responsibility and fewer roles in the production area, both of which contribute to a lower associated pay level. With this in mind, we are aware that there is still a great deal of work to be done in the corporate sphere. However, we know that addressing these imbalances is important, which is why we are implementing strategies to foster an equitable distribution of leadership opportunities and roles involving responsibility.

Finally, Vidrala discloses risks and opportunities specific to particular employees, such as those working in certain countries, factories, or roles. This level of detail enables the company to implement effective interventions and provide customised support for those most affected.

Policies related to own workforce

Section to disclose "Policies related to own workforce" as determined in DR "S1-1" from ESRS regulation*.

Occupational Health and Safety Management System- Integrated policy:

At Vidrala, our commitment to people is reflected in the comprehensive policies we implement to ensure the well-being, safety, and development of our people. Central to our approach is compliance with the ISO 45001:2018 certification, which governs our Occupational Health and Safety Management System across all manufacturing sites. This ensures that our facilities operate under the highest health and safety standards, with proactive measures in place to identify and mitigate risks. Through regular internal and external audits, we uphold our responsibility to maintain a safe working environment for all employees. This management system is supported by our Integrated Policy that :

- Reflects a strong commitment to safe, legal, and sustainable working conditions, prioritising employee well-being, equal opportunities, and professional development.
- Applies to all employees and operations, ensuring compliance with best labour practices and a structured approach to risk prevention. It emphasises consultation and dialogue with employees and their representatives, fostering inclusion and active participation in decision-making.
- The Executive Leadership and Management Team are responsible for overseeing its implementation, ensuring alignment with labour laws, occupational safety standards, and industry best practices.

The policy is actively communicated through internal channels, training programmes, and compliance processes, ensuring accessibility for employees and relevant stakeholders as it is published in our website.

Our health and safety policies include programs that foster a culture of prevention, such as the Behavioral Safety Program and the R3 initiative, which focuses on reducing exposure to risks, recycling safe habits, and reusing lessons learned to enhance workplace safety. These initiatives involve all levels of the organisation and encourage collaboration to continuously improve safety practices. In addition to these measures, Vidrala systematically provides accident prevention training, covering areas such as emergency response and incident investigation, to further reduce risks.

In terms of employment practices, Vidrala ensures job security through a high proportion of indefinite contracts and applies flexible working arrangements where feasible. Our policies also promote work-life balance through flexible schedules, hybrid work models for eligible roles, and a strong commitment to digital disconnection, ensuring employees can maintain clear boundaries between professional and personal life. We also have a remuneration policy in place that establishes salary bands linked to the position held within the organisation, irrespective of gender, race, religion, etc., thus ensuring a fair and equitable remuneration scheme.

To support employee well-being, Vidrala has implemented robust social benefit programs, including flexible remuneration schemes, voluntary early retirement options, and work schedules tailored to operational needs. We also offer initiatives to enhance physical and mental health, such as regular health checks, ergonomics workshops, and specific measures like smoking cessation programs.

Diversity, equality, and inclusion are integral to our workforce policies. Vidrala's Equality Plan ensures impartial salaries and promotes gender diversity across all roles. We actively work to address gender imbalances in the glass manufacturing industry, implementing measures to foster inclusivity and equal opportunities. Our recruitment processes eliminate unconscious bias, and we continuously assess and refine our practices to ensure a discrimination-free workplace. Moreover, we are proud at Vidrala to have an equal pay policy in place, the purpose of which is to eliminate any form of gender pay gap there may be for the same job.

"We are committed to equity, diversity and inclusion in the workplace, and we see this as a tremendous opportunity to empower young females in this community. Manufacturing is not known historically as a place where there is a large female representation within the workforce. We want to show that this does not have to be the case."

"We have the chance now to drive forward into the future with a true purpose, providing the young ladies with the support, encouragement, guidance and experience to thrive and drive all our businesses to a new, equal, future, that will transform our world."

Sarah Abernethy, Talent Projects Specialist
and the Encirc lead for "The Girls Network"

Human Rights Policy:

Vidrala's Human Rights Policy enforces a zero-tolerance approach to modern slavery, human trafficking, and forced labour, ensuring compliance with international standards such as the Universal Declaration of Human Rights and ILO core conventions. The policy applies to all Vidrala Group companies and suppliers, who must uphold ethical labour practices, including prohibiting child labour, forced labour, debt bondage, and ensuring fair wages and safe working conditions.

This policy also ensures non-discrimination and gender equality, prohibiting any bias in salary, hiring, training, promotion, maternity protection, or dismissal based on race, ethnicity, religion, age, disability, gender, or other protected characteristics. The company and its suppliers must uphold political, philosophical, and religious neutrality and guarantee equal treatment for female employees, complying with all applicable gender equality laws and the United Nations' Universal Declaration of Human Rights.

The Executive Leadership oversees compliance, with regular audits and ESG reviews, including SEDEX membership and SMETA 4-Pillar audits covering labour practices, health and safety, and business ethics. Suppliers must adhere to contractual anti-slavery clauses, and non-compliance may lead to contract termination.

To ensure transparency, the policy is communicated through supplier agreements, internal audits, and Vidrala's Whistleblowing Channel, allowing for confidential reporting of breaches. Vidrala continuously monitors adherence through supplier audits and self-assessment mechanisms, reinforcing ethical standards across its operations.

Engaging with our people

Section to disclose "Processes for engaging with own workforce and workers' representatives about impacts" as determined in DR "S1-2" from ESRS regulation*.

To foster active engagement and encourage participation in Vidrala's sustainability initiatives, we regularly share updates and progress with our teams across all locations. Recognizing the importance of sustainability, diversity, and well-being for both current and future employees, Vidrala promotes these values through various programs and initiatives. For example, our Well Being - Be Healthy Company program includes activities across nutrition, sports, health, work-life balance, and corporate responsibility, fostering a culture of collaboration and continuous improvement. Additionally, our diversity-focused initiatives, such as the #YesWeGlass campaign, celebrate the contributions of women in the glass industry and challenge traditional stereotypes in manufacturing.

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We communicate with our team members through a wide array of platforms, including town hall meetings, internal newsletters, social media updates, and our corporate intranet. These channels ensure that all employees are informed about Vidrala's sustainability journey, health and safety practices, and key business developments. In 2024, we continued to spotlight sustainability and employee well-being through tailored internal communications that highlight ongoing progress and milestones.

To better understand employee perspectives on Vidrala's strategy, vision, work environment, and job satisfaction, we conduct regular confidential surveys. These surveys provide critical insights into the needs and expectations of our employees, helping us refine and align our goals and policies with their feedback, as mentioned in the previous section. The Executive Management is responsible for overseeing its implementation.

We also carry out engagement surveys across the organisation to measure satisfaction in areas such as leadership, collaboration, continuous improvement, diversity, and inclusion. To ensure confidentiality, these surveys are administered by third-party entities, allowing employees to provide candid feedback without concerns about privacy. The insights gained from these surveys play a pivotal role in shaping Vidrala's organisational culture, enhancing workplace satisfaction, and improving our practices to create a more inclusive, engaging, and sustainable working environment for all.

Vidrala assesses the effectiveness of workforce engagement through structured feedback mechanisms, including employee surveys, consultation with workers' representatives, and participation in external workforce ratings such as Great Place to Work. These tools allow us to measure engagement levels, satisfaction, and areas for improvement. Additionally, KPIs related to employee retention, absenteeism, and grievance resolution rates are tracked to evaluate the impact of engagement initiatives. Findings are periodically reviewed by HR and management teams to ensure continuous improvement in communication and employee involvement.

Processes to remediate negative impacts and channels for our people to raise concerns

Section to disclose "Processes to remediate negative impacts and channels for own workers to raise concerns" as determined in DR "S1-3" from ESRS regulation*.

Vidrala has implemented robust processes and channels to ensure the remediation of negative impacts and to provide employees with mechanisms to raise concerns effectively. Our approach includes structured programs, proactive training, and dedicated initiatives aimed at maintaining a safe, healthy, and supportive work environment for all employees.

A key part of this approach is our behavioral safety program, which raises awareness among employees about potential hazards, such as burns, cuts, or muscle strains. This program enables the proactive identification of risks before they materialise, ensuring that effective mitigation strategies can be implemented promptly.

Vidrala conducts annual interviews with external professionals to assess psychosocial risks across all departments. These assessments are complemented by satisfaction surveys, which offer employees an opportunity to express their concerns confidentially. Through systematic classification of risks—ranging from physical work factors to organisational elements like task content, leadership styles, and role clarity—our processes enable targeted interventions that address root causes and enhance employee well-being. The evaluated risks include:

- **Physical work factors:** workspace, breaks, ergonomics and work design, environmental factors such as lighting, noise and temperature, order and cleanliness.
- **Information management:** communication, participation, and training.
- **Control and leadership:** leadership style and communication with superiors.
- **Organisation of work:** task content and distribution, resources and work tools, attention, time pressure, role definition, autonomy, job stability, career development, and shifts.

On the other hand, the methodology used to manage this process is the following:

- Interviews with workers from the various evaluated sections.
- Meetings with the Prevention Service.
- Interviews with Prevention Delegates.

To protect the confidentiality of collected data, job roles are anonymised and grouped during evaluations, ensuring that employees can share concerns without fear of identification. Consent for data collection is always obtained prior to interviews.

In addition to risk identification, Vidrala delivers comprehensive training programs tailored to the specific needs of diverse roles. These include mandatory training for all job positions and initiatives like the R3 activity, which focuses on focused on Reducing exposure to accident risks, Recycling safety habits and Reusing positive learning.

The key points of this initiative are as follows:

- Our goal is to reshape our prevention culture by fostering safety behaviours against a backdrop of learning and communication. We also strive to create a working environment with a fair culture model, which helps us to maintain consistency and credibility.
- The process was co-designed by the teams and got everyone involved (operators, line management, health and safety officers, human resources, prevention services). It has an ethical and systemic approach based on shared responsibilities, developing relationship skills (proactive and supportive behaviours) to create a healthy and safe workplace.
- The creation and active participation of the project leadership team made up of the Operations and Quality and Prevention departments and Plant Management has been key to the project's achievements thus far.

In this regard, we have deployed 28 R3 teams at our plants in Spain and Portugal since 2022. In January 2024, we deployed a further 3 new R3 activity teams with which we continue to cultivate a "Safe Behaviour Culture".

To provide employees with accessible channels for raising concerns, Vidrala leverages various tools such as anonymous surveys, daily safety signal reviews, and structured observation programs. These platforms encourage continuous feedback and facilitate timely remediation of any irregularities. The visibility of safety performance metrics, along with a structured follow-up process, ensures that concerns are addressed transparently and efficiently.

In view of the potential risks to which our employees may be exposed, at the Vidrala Group, we insist on strict compliance with the regulations of the International Labour Organisation and we have established internal policies to ensure that all our employees are supported in this regard. As a result, 100% of the workforce is partially or fully covered by collective bargaining agreements.

In addition to risk identification, Vidrala delivers comprehensive training programs tailored to the specific needs of diverse roles. These include mandatory training for all job positions and initiatives like the R3 activity, which focuses on focused on Reducing exposure to accident risks, Recycling safety habits and Reusing positive learning.

We have deployed 27 R3 teams at our plants in Spain and Portugal since 2022. In January 2024, we deployed a further 11 new R3 activity teams with which we continue to cultivate a "Safe Behaviour Culture".

Action on material impacts on our people, and approaches to managing material risks and pursuing material opportunities related

Section to disclose "Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches" as determined in DR "S1-4" from ESRS regulation*.

At Vidrala, we actively manage risks and maximise opportunities within our people through a combination of policies, processes, and programs specifically designed to address the needs of our employees and the evolving dynamics of the workplace.

One of the key actions we take is the design of flexible work schedules and regimes, adapted to the specific characteristics of each plant and operational area. This flexibility allows us to balance production needs with the personal demands of our employees, reducing stress related to time management and improving work-life balance. Additionally, we have implemented hybrid remote work systems for several roles, reinforcing our commitment to adapting to new ways of working.

We recognise that internal dynamics can create psychosocial risks related to workload, time management, and communication. To mitigate these risks, we promote continuous dialogue between employees and managers through structured processes such as confidential interviews and consultations with prevention delegates. These initiatives ensure that issues are identified early and solutions are personalised and effective.

To foster development opportunities, Vidrala has established professional classification policies and flexible remuneration systems that enable employees to advance in their careers transparently and fairly. Additionally, we offer social benefit schemes such as voluntary early retirement, paid leave, and reduced working hours, reinforcing our commitment to the overall well-being of our employees.

At an organisational level, we promote digital disconnection as part of our workplace policies, ensuring that employees can enjoy their personal time without work-related interruptions. This initiative not only improves the general well-being of the workforce but also contributes to emotional and mental sustainability in the long term.

Vidrala also recognises the importance of well-being. In 2024 we continue with our Well Being - Be Healthy Company programme in the Group. The programme comprises five areas and it is adapted to each organisational habitat: nutrition, healthy sports, health, work-life balance, and corporate social responsibility. The programme has specific characteristics in each workplace, as one of its pillars is to provide a tailored service in each location based on the interests of the individuals in each area.

- **Nutrition:** This is a fundamental aspect of our Well Being - Be Healthy programme and the first one we implemented. We've introduced multiple initiatives: weekly fruit offerings, specific campaigns related to combating cholesterol (nuts) or improving cardiac defences with the delivery of berries. guidelines and recommendations for a healthy diet to all our work meetings, where coffee breaks now feature healthy and functional foods to enhance productivity in both work meetings and training sessions. Our collaboration with the centres or hotels we work with has become crucial in developing this programme that reaches the entire staff, without exception. Within the realm of food-conciliation, we've initiated an online platform for purchasing meat products and similar items from a local 'zero km' store, promoting local consumption and providing a convenient and high-quality shopping alternative for our employees.

- **Healthy Sports:** Promoting a healthy sporting lifestyle is an integral part of our Be Healthy programme, responding to the demand within our organisation. We have various ongoing initiatives aimed at creating physical activity habits accessible to everyone and catering to the diverse preferences of our staff. Key initiatives include adapted to each habitat spinning classes, yoga practice, participation in corporate running events, among others.

- **Health:** Possibly the most crucial aspect of our Be Healthy programme, focusing on ensuring the best physical and mental health of our people. While there are specific and weighty initiatives in this area, it is also an arena where the effects of initiatives from other sections of our programme converge. Health-related activities include: additional checks in health analyses, healthy back workshop, food intolerances and for example, new in 2023, smoking cessation courses.

- **Conciliation:** Conciliation is one of the more challenging aspects to address in a healthy company programme, often being expressly regulated in collective agreements. Our main actions here revolve around the company's maximum availability for many programme activities to occur during working hours, offering significant advantages for employees to participate without sacrificing personal time. In some cases, while the time is personal to workers (such as in sports activities), the company provides maximum flexibility regarding working hours to maximise participation. Additionally, we've installed a device in our offices to facilitate the delivery of packages from online purchases made by our employees, eliminating the concern of dealing with deliveries during their working hours.

Our commitment to employee well-being is indisputable and a cornerstone of our 4Ps strategy. However, we want to continue to improve our everyday lives and will thus continue to innovate and explore new ways to ensure a working environment where employee job satisfaction keeps growing. To determine appropriate actions in response to current or potential negative impacts, Vidrala relies on the analysis of internal data on workplace climate, turnover rates, and health and safety, alongside ongoing employee dialogue enabling the early identification of risks and the implementation of corrective measures. Moreover, future projects in 2025 will focus on conducting a comprehensive analysis of the potential impacts of our transition plans on employment within Vidrala.

The effectiveness of these actions and initiatives is assessed through internal employee surveys, performance indicators, and consultations with worker representatives, ensuring they contribute effectively to improving working conditions. This approach allows us to measure the real impact of our policies on job stability, working conditions, and professional development.

In 2024 we continue with our Well Being - Be Healthy Company programme in the Group. The programme comprises five areas and it is adapted to each organisational habitat: nutrition, healthy sports, health, work-life balance, and corporate social responsibility.

Targets around Our People

Section to disclose "Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities" as determined in DR "S1-5" from ESRS regulation*. Applied MDR-T 81

At Vidrala, we recognise the critical role our team plays in driving our success, and we are committed to managing their impacts, risks, and opportunities responsibly. We present our outcome-oriented targets designed to address the well-being of our employees and ensure effective management of workforce-related risks.

To maintain accountability and drive continuous improvement, the effectiveness of policies and actions related to material sustainability impacts, risks, and opportunities is primarily tracked through qualitative assessments and workforce-related KPIs. These include employee engagement surveys, absenteeism rates, retention levels, and health and safety performance indicators, which provide insights into the overall impact of our initiatives.

The tracking process relies on internal reporting mechanisms, feedback gathered through employee consultations, and compliance with labour regulations and sustainability frameworks. Progress is evaluated based on continuous improvement and key workforce-related data points are regularly reviewed by HR and management teams to identify trends and areas requiring action.

Regarding the base year for measuring progress, Vidrala currently monitors workforce indicators on an ongoing basis, without a formally established reference year. Future developments in sustainability objectives for employees may include the introduction of structured targets and a defined baseline year to enhance progress tracking.

Our People Insights

Section to disclose "Characteristics of the Undertaking's Employees" as determined in DR "S1-6" from ESRS regulation*.

As of 31 December 2024, Vidrala had 4,886 employees belonging to the different business units. As shown in the tables below, the countries with the most employees were, in descending order, United Kingdom, Spain, Brazil, Portugal, Ireland and France. According to voluntary turnover, the rate was 3.2%, improving from 5.0% in 2023.

Employees by country

	2022	2023	2024
United Kingdom	1,497	1,909	1,961
Spain	1,097	1,075	1,050
Portugal	872	881	900
Italy*	187	192	32
Ireland	10	10	10
France	10	9	9
Brazil	0	0	924
TOTAL	**3,673**	**4,076**	**4,886**

The geographic distribution of employees is calculated by aggregating the total headcount of employees within the specific geographical locations where our entities are located. Please note that the Italian plant was divested in early 2024, and its operations are no longer included in the scope of the consolidated financial statements. The percentage of employee turnover was 10% and 475 left Vidrala during 2024.

Gender	Number of Employees (Head Count)
Male	4,214
Female	672
Total Employees	**4,886**

Employees by:	2022	2023	2024
Directors	47	46	50
Line Manager	469	544	584
Other Employees	3,157	3,486	4,252
Total Employees	**3,673**	**4,076**	**4,886**

This figure is disclosed in the financial statement, Note 25.

Methodologies and Assumptions

Section to disclose "Characteristics of non-employees in the undertaking's own workforce" as determined in DR S1-7" from ESRS regulation*.

Total Employees

The total headcount of employees at Vidrala is calculated by aggregating the employee count across all countries where the company operates. This calculation is based on an average taken over the reporting period. Employee data is updated in internal systems.

Permanent Employees

Permanent employees are defined as those with an employment contract, regardless of whether it has a fixed-term or indefinite duration. This category also includes employees under partial retirement schemes. The calculation is based on an average headcount over the reporting period.

Temporary Employees

Temporary employees are those without a permanent contract and whose employment is limited to a defined period. This category includes employees working under fixed-term agreements.

Part-Time Employees

Part-time employees are defined as those whose working hours are less than 100% of a full-time schedule. This excludes employees on temporary parental leave with a reduced workload.

Employee Turnover

Employee turnover is assessed based on voluntary and involuntary departures. Specifically, dismissals are classified as non-voluntary exits, excluding resignations or retirements.

Remuneration

Remuneration consists of the base salary and includes all salary components except:

- Social security contributions paid by the company
- Deductions for life insurance and medical insurance for employees' family members

Top Management

Top Management categories include Executive team and Director representation.

Turnover

The turnover rate was calculated including voluntary departures and dismissals.

Collective bargaining coverage and social dialogue

Section to disclose "Collective bargaining coverage and social dialogue" as determined in DR S1-8" from ESRS regulation*.

In view of the potential risks to which our employees may be exposed, at the Vidrala Group, we insist on strict compliance with the regulations of the International Labour Organisation and we have established internal policies to ensure that all our employees are supported in this regard. As a result, 100% of the workforce is partially or fully covered by collective bargaining agreements.

	Nº
Percentage of total employees covered by collective bargaining agreements	100 %

	Collective Bargaining Coverage		Social Dialogue
Coverage Rate	EEA (for countries with >50 empl,representing>10 % total empl)	Non- EEA (for countries with >50 empl,representing>10 % total empl)	Workplace representation (for countries with >50 empl. representing >10% total empl)
80-100%	Spain Portugal UK Ireland	Brazil	Spain Portugal UK Ireland

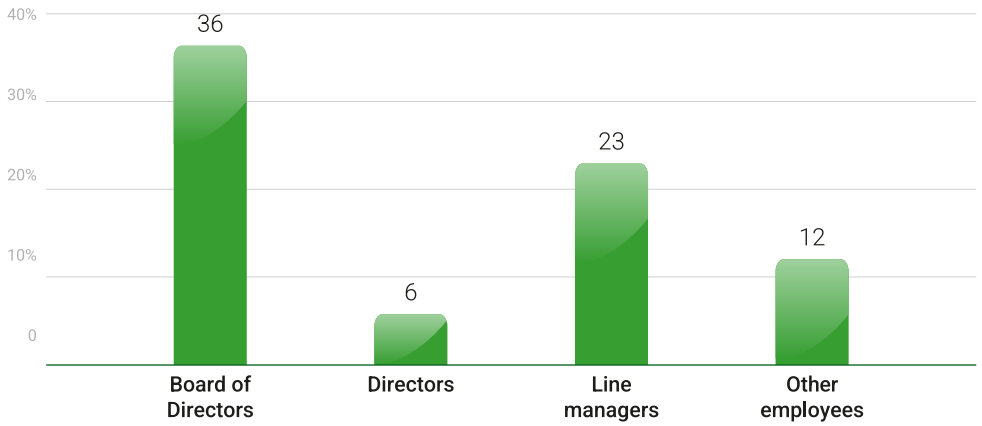
Diversity Matrix

Section to disclose "Diversity Matrix" as determined in DR S1-9" from ESRS regulation*

We are aware of the gender disparity in glass production, an industry in which men predominate. The greater number of men compared to women is due to a combination of factors, among them deep-seated traditions that have maintained particularly male-dominated roles, the traditional inflexibility of roles especially in operations, the shift-based nature of the work, and the taxing physical demands associated with certain roles. Despite these challenges, Vidrala is firmly committed to gender equality, which is why we are implementing measures designed to foster diversity across all levels of the organisation, including production itself.

Our integrated Equality Plan, which highlights diversity as an essential asset, has been in place since 2010. In this regard, we are immensely proud of the fact that we are still operating under the same original plan, the principles and goals of which remain in force and relevant today. Furthermore, in line with our commitment to the 2030 Agenda, we are also contributing to achieving the SDG associated with gender equality, based on the lines of action established in this area.

Female presence across the organisation (%)



Top management description included under S1-7

	2023	2024
Female	2	2
Male	44	48
Total	**46**	**50**

Adequate Wages

Section to disclose "Adequate Wages" as determined in DR S1-10" from ESRS regulation*.

Vidrala Group presents a compensation strategy based on promoting both internal and external competitiveness, adapting to market circumstances and local conditions. The Group fosters a competitive and coherent remuneration system that ensures the satisfaction of basic needs while providing the opportunity for employees to enjoy an improved standard of living.

Additionally, our global compensation strategy—which encompasses wages, social benefits, working conditions, workplace environment, and emotional salary—contributes to the well-being of our employees, enabling them to perform their tasks more efficiently and with greater motivation. This approach supports their physical and mental well-being, which is also influenced by broader social contexts.

Voluntary internal turnover serves as an indicator of employee commitment and loyalty to the organisation and reflects a compensation strategy that dignifies the relationship between employees and the company. Comparative data on voluntary internal turnover across the labor markets in various countries demonstrate that when the compensation strategy aligns with our global approach, employees at Vidrala feel their work is valued and appropriately rewarded.

	Spain	Portugal	France	UK	Ireland	Brazil
Internal Average Hourly Wage	31.77	16.69	35.17	26.71	22.06	12.56
Internal Minimum Hourly Wage	13.40	8.53	16.39	11.76	19.83	6.48
Legal Minimum Hourly Wage	8.82	6.35	13.46	10.77	12.09	1.45

*Internal minimum wage is related to other services and represent less than 1% of total employees
*Internal average hourly wage were calculated excluding Director salaries

The data on our salary offerings across all countries illustrate consistency with the above principles, as well as alignment with our short-, medium-, and long-term compensation strategy.

These salary data also include average variable compensation tied to the performance of our results and external competitiveness. This ensures that the deployment of this compensation policy remains sustainable for the present and the future of our business outcomes.

Finally, the compensation strategy integrates social dialogue to incorporate diverse perspectives, as evidenced by the current continuity agreements reflected in the applicable Collective Bargaining Agreements. The implementation of a "Fair Wage" policy is not a one-time action but a continuous commitment that requires regular adjustments and adaptations to economic and social changes.

Social Protection

Section to disclose "Social Protection" as determined in DR S1-11" from ESRS regulation*.

At Vidrala, we ensure that our employees are protected against income loss in the event of significant life events, including illness, occupational injury, parental leave, and retirement. These protections are provided in line with applicable employment terms and conditions, as outlined in employee contracts and internal policies.

Persons with disabilities

Section to disclose " Persons with disabilities" as determined in DR S1-12" from ESRS regulation*.

Vidrala has grown in terms of hiring people with disabilities or handicaps, which already account for more than 1% of its workforce. Internal data have been used as a continuation of previous reports and in accordance with the respective legal framework of each region and/or country.

In addition, collaboration has been consolidated with Special Employment Centres and other external entities, composed of people with reduced abilities or physical and mental disabilities, who provide certain auxiliary services to Vidrala's main activity, under the direct coordination of professionals specialised in monitoring these professionals. The following tables shows the gender distribution:

% Of own employees with disabilities

Gender	%
Male	2 %
Female	1 %

Training and skills development

Section to disclose " Training and Skills Development metrics" as determined in DR S1-13" from ESRS regulation*.

We believe that professional development, health, and well-being of our people are key to our sustainable business strategy. Hence, we provide excellent employment opportunities that offer job security and competitive working conditions. At Vidrala, our value proposition bears the label 'Vidrala Horizon' goals. At Vidrala, 16% of our employees participate in regular performance and career development reviews.

At the operational level (line managers, supervisors and technical specialists, etc.), One Horizon is a programme for more than 350 people that is renewed every 3 year and its objectives are as follows:

- Developing internal talent from a short, medium and long term strategic perspective.
- Providing an opportunity to share learning and best practices across the Group.
- Providing e-learning solutions to all participants.

In this context, we continue to invest in employee development, having invested a total of 102,916.87 hours during the reporting year. The improvement in internal stability and the reduction in voluntary turnover have led to less time dedicated to onboarding training and have allowed us to advance in our Knowledge Management model.

Hours of Training by professional category

	2022	2023	2024
Directors	941	800	838
Line Manager	17,763	26,755	16,664
Other Employees	112,764	82,539	85,415
TOTAL	**131,468**	**110,094**	**102,917**

The average number of training hours per employee

Gender	Nº
Male	21
Female	18

Job Category	Nº
Directors	15
Line Manager	3
Other Employees	19

Health and safety metrics

Section to disclose " Health and safety metrics" as determined in DR S1-14" from ESRS regulation*

Vidrala is committed to ensuring the health, safety, and well-being of its employees by adhering to rigorous occupational safety standards and continuously improving its safety culture. Our Health and Safety Management System is aligned with recognised standards such as ISO 45001 and covers 100% of the Group's manufacturing facilities ensuring comprehensive risk management and prevention measures.

Key Health and Safety Indicators

- **Percentage of employees covered by health and safety management systems**
  - 100% of Vidrala employees are covered by health and safety management systems.
- **Number of fatalities in Vidrala's employees due to work-related injuries or work-related ill health**
  - In 2024, the number of fatalities recorded among Vidrala employees due to occupational injuries or illnesses was 0.
- **Number of fatalities among other workers operating on Vidrala sites due to work-related injuries or ill health**
  - In 2024, Vidrala recorded 0 fatalities among contractors or external workers operating on our sites.
- **Number of recordable work-related accidents for Vidrala employees**
  - During the reporting year, a total of 135 work-related accidents were recorded among our employees.

	2022	2023	2024
Work Accidents	88	84	135

- **Rate of recordable work-related accidents for Vidrala employees**
  - The total accident frequency rate (incidents per million hours worked) for Vidrala employees in 2024 was 5.54 in the case of female and 19.55 in the case of male.
- **Number of cases of recordable work-related ill health among employees**
  - In 2024, Vidrala identified 120 cases of work-related illnesses among its employees. he identification and reporting of occupational diseases vary across geographical locations due to differences in legal frameworks and procedural approaches. These variations may affect the comparability of data between Vidrala's production plants, so an approach based on individual employee assessment has been considered.

Conditional disposal

	Male	Female	Total
2023	7	7	14
2024	10	5	15

- **Number of days lost due to work-related injuries, fatalities, and work-related ill health among employees:** The total number of lost workdays due to occupational accidents, work-related fatalities, and work-related illnesses in 2024 was 4,647 days.

Commitment to Continuous Improvement

Vidrala continuously reinforces its health and safety culture through employee training, risk assessments, and proactive engagement with stakeholders. In addition, the company has strengthened internal policies to ensure adherence to the highest safety standards and to minimise workplace risks. We would like to highlight that we have included 39,496 hours dedicated to health and safety training.

Work -Life Balance

Section to disclose " Work-life Balance" as determined in DR S1-15" from ESRS regulation*.

At Vidrala, we prioritise the well-being and work-life balance of our employees by offering a range of benefits and flexible work arrangements. Our initiatives include professional classification systems, adaptable work schedules based on different shifts, flexible entry and exit times, paid leaves, sabbaticals, and reduced working hours to support a better balance between professional and personal life. Additionally, we provide voluntary early retirement plans, social security systems, and flexible compensation policies to enhance financial security for our employees. In addition, 100% employees are entitled to family-related leave through social policy and/or collective bargaining agreements, reinforcing our commitment to supporting employees in balancing their professional and personal responsibilities. A total of 9% of our employees took a family-related leave.

Recognizing the evolving needs of our employees, we have also implemented a hybrid work model tailored to different organisational environments, subject to validation by respective department heads. While not all roles in our production-based operations can benefit from remote work, we have adjusted compensation measures for employees whose positions require physical presence, ensuring fairness across teams.

Furthermore, Vidrala is committed to fostering a digital disconnection culture to safeguard personal and family privacy. We have established measures to respect employees' rest periods and vacations, discourage the use of digital devices for work purposes outside designated hours, and promote flexible schedules. These initiatives reflect our dedication to creating a supportive and adaptable work environment, ensuring that employees feel valued, engaged, and able to maintain a healthy work-life balance.

Remuneration

Section to disclose " Remuneration metrics (pay gap and total remuneration)" as determined in DR S1-16" from ESRS regulation*.

At Vidrala, we are committed to fostering an inclusive workplace that ensures equal opportunities for all employees, regardless of gender. We actively promote the meaningful participation of women in leadership roles across all levels of the company, reinforcing our dedication to equity in economic, operational, and strategic decision-making.

Pay equity is a fundamental human right, and we are dedicated to eliminating any gender-based wage disparities. We work closely with employee representatives to address this responsibility and ensure that our remuneration policies are fair, transparent, and aligned with our commitment to equality.

However, if we focus on the organisation's salary dynamics, we can see that the average salary for women is actually (3)% lower than for men (compared to (10.7)% in 2023 and (12.3)% in 2022). This disparity is directly attributable to the distribution of job roles, as women tend to occupy positions of lower responsibility and fewer roles in the production area, both of which contribute to a lower associated pay level. With this in mind, we are aware that there is still a great deal of work to be done in the corporate sphere. However, we know that addressing these imbalances is important, which is why we are implementing strategies to foster an equitable distribution of leadership opportunities and roles involving responsibility.

We also have a remuneration policy in place that establishes salary bands linked to the position held within the organisation, irrespective of gender, race, religion, etc., thus ensuring a fair and equitable remuneration scheme.

In addition, we also hold the Diversity Mark Accreditation, which certifies our commitment to building diverse and inclusive working environments, and is awarded to organisations that demonstrate significant progress in this area.

In 2024, the CEO remuneration ratio compared to median Vidrala was 1:16.

Table: Average remuneration by: Gender, age, professional category

	2022	2023	2024
Female	€40,268	€44,240	€45,482
Male	€45,893	€49,517	€46,941
TOTAL	**€45,083**	**€48,738**	**€46,740**
Under 30 years old	€37,422	€40,909	€32,971
31-50 years old	€45,729	€49,119	€44,813
Over 50 years old	€46,712	€50,787	€57,241
TOTAL	**€45,083**	**€48,738**	**€46,740**
Directors	€181,795	€211,971	€258,869
Line Manager	€72,730	€76,137	€79,211
Other Employees	€38,940	€42,308	€39,786
TOTAL	**€45,083**	**€48,738**	**€46,740**

*Reported data includes variable remuneration, mainly related to results and productivity, as well as other remuneration items (such as social benefits, retirement supplement, travel supplements and allowances, etc.). In order to improve comparability, the average remuneration by category does not include amounts related to multi-year variable remuneration of irregular perception.
**Average remuneration of Directors, by gender: omitted in previous years for data protection reasons, as there was only one female director.

Average remuneration of the Board of Directors

	2022	2023	2024
Female	99,796	107,131	109,934
Male	159,416	182,055	194,164
TOTAL	**139,543**	**154,810**	**163,535**

Average remuneration of Directors

	2022	2023	2024
Female	146,335	174,425	216,509
Male	183,371	213,678	260,634
TOTAL	**181,795**	**211,971**	**258,869**

Incidents, complaints and severe human rights impacts

Section to disclose " Incidents, complaints and severe human rights impacts" as determined in DR S1-17" from ESRS regulation*.

Discrimination and harassment

Vidrala firmly opposes all forms of human trafficking, slavery, servitude, forced labor, and any related activities, as explicitly stated in our Human Rights Policy, developed in 2022 in alignment with the Modern Slavery Act 2015 and international treaties such as the United Nations Universal Declaration of Human Rights. This policy outlines the concrete steps we have taken—and continue to take—to ensure that modern slavery and human trafficking do not exist within our business operations or supply chain.

In the reporting period, we received 9 complaints through our Whistleblowing channel, mainly related to harassment or discrimination. Six of these communications were resolved.

Severe Human Rights Incidents

We have not identified any severe human rights incidents in our workforce in the reporting period. This includes incidents of forced labor, human trafficking, or child labor and complaints filed to National Contact Points for OECD Multinational Enterprises.

Fines, Penalties, and Compensation

There were no fines, penalties or compensations in 2024.

4.3.17 Workers in the value chain

Currently, Vidrala have evaluated impacts, risks, and opportunities associated with workers in the value chain, as required under ESRS S2. However, as a group, we recognise the importance of applying higher efforts towards the communication with suppliers and addressing social impacts, ensuring that labor practices across our supply chain align with international standards for human rights and fair working conditions.

Vidrala ensures that all value chain workers who may be materially impacted by its operations are included within the scope of disclosure under ESRS 2. The primary categories of workers affected include those in manufacturing, logistics, and distribution, with impacts arising both from Vidrala's direct operations and through its broader supply chain.

Impact, risks and opportunities

Geographically, the company has identified potential risks of forced labour in certain upstream supply chains, particularly in regions where regulatory enforcement may be weaker, though no confirmed cases have been detected. Negative impacts identified, such as gender inequality, wage disparities, and occupational health and safety risks, are actively mitigated through Vidrala's Human Rights Policy and Supplier Code of Conduct, which establish strict requirements for fair treatment, equal pay, and workplace safety. Negative impacts identified are commonly systemic. These policies ensure that suppliers adhere to international labour standards and implement corrective measures where necessary.

Positive impacts stem from initiatives such as supplier engagement programmes, fair wage commitments, and the promotion of collective bargaining rights, benefiting factory workers, logistics personnel, and contracted labour. Material risks, including labour rights violations, lack of access to grievance mechanisms, and systemic inequalities, are addressed through Vidrala's Code of Conduct, which mandates supplier audits, risk assessments, and monitoring mechanisms. Opportunities exist in strengthening social dialogue, supplier capacity-building, and enforcing ethical sourcing standards to enhance long-term sustainability. Vidrala has not reported issues, complaints, or cases under investigation regarding high-risk worker groups, reinforcing the effectiveness of its policies. However, throughout 2025, Vidrala will implement an internal tool to enhance supplier monitoring, enabling more comprehensive tracking of compliance, risks, and performance across its supply chain, including a better understanding of impacts on specific groups.

Policies

Policy	Purpose	Scope	Availability	Applicability across Sustainability Statement
Supplier Code of Conduct	Ensuring ethical business conduct and compliance with human rights standards	All global suppliers and business partners	Internal available	Workers in the value chain - Business conduct
Human Rights Policy	Safeguarding fair labour practices, preventing forced and child labour, and ensuring equal treatment	All individuals impacted by Vidrala's operations	Internal available	Workers in the value chain - Business conduct

Vidrala's Human Rights Policy establishes a firm commitment to protecting and promoting human rights across its value chain, ensuring fair and ethical working conditions for all individuals impacted by its operations. The policy aligns with the International Labour Organisation (ILO). To address and remedy human rights impacts, Vidrala enforces strict corrective action plans when non-compliance is identified and it explicitly prohibits forced labour, child labour, human trafficking, and all forms of discrimination, ensuring that workers in the supply chain are treated with dignity, equality, and respect.
The Supplier Code of Conduct is a mandatory framework that all business partners must adhere to, reinforcing compliance with labour rights and workplace standards. Furthermore, all value chain workers can raise any concerns, including grievances related to human rights through our reporiting system (https://vidralawhistleblowing.integrityline.com/). The Compliance Officer, supported by a competent governing body, holds operational responsibility for ensuring worker engagement initiatives are effectively implemented and integrated into our approach. To date, no cases of non-compliance with the UNGPs, ILO conventions, or OECD guidelines have been reported within Vidrala's value chain.

Actions

Vidrala is developing an internal tool to enhance supplier assessment and risk management, strengthening supply chain resilience, efficiency, and sustainability. This initiative will enable a comprehensive evaluation of suppliers, gathering primary data and incorporating predictive risk analysis to support decision-making and ensure responsible business practices.

In cases of material negative impacts, the tool will facilitate remedial actions, while also promoting positive impacts by fostering supplier development in key areas such as compliance, ESG, and business continuity. The effectiveness of these actions will be monitored through real-time tracking.

The approach prioritises critical and intermediate suppliers, representing a high total spending, while others will be assessed through a predictive model. Vidrala enforces its Supplier Code of Conduct and conducts regular audits to ensure that its own practices do not contribute to negative impacts. The internal tool will be gradually deployed over a five-year period, with suppliers being onboarded across all business units to maximise efficiency and compliance.

As part of our commitment, Vidrala is taking the following steps to strengthen its approach to workers in the value chain:

- Establishing a supplier code of conduct that clearly defines our expectations regarding labour practices, human rights, and social standards.
- Providing training and resources to key suppliers to promote the adoption of sustainable and fair labour practices.
- Partnering with industry organisations and stakeholders to drive collective action on social issues across the value chain.
- Monitoring Systems: Developing a robust system for tracking and reporting labour-related impacts, including grievance mechanisms for workers in the value chain, as mentioned in this section. Further actions will be developed

Vidrala is committed to addressing these gaps and progressively improving its ability to disclose relevant information in line with the CSRD and ESRS S2 requirements. While we are currently in the early stages of this process, we aim to implement comprehensive systems and procedures by 2025. Updates on our progress, including policy developments, actions taken, and key performance indicators (KPIs), will be disclosed in future sustainability reports.

4.3.18 Consumers and end users

We integrate customer satisfaction into our four strategic pillars, seeking to represent and promote the assurance that our offerings meet ethical and sustainability standards throughout the value chain. however, due to the nature of our operations as a business-to-business (B2B) company, we do not have specific policies exclusively dedicated to consumers or human rights in this area.

We ensure that consumer interests are safeguarded through broader corporate commitments embedded in Vidrala's Integrated Policy, which includes a strong focus on product safety, quality, and compliance. This policy establishes our commitment to ensuring the safety and integrity of our packaging solutions, preventing risks related to product contamination, material compliance, and environmental impact.

Policy

Policy	Purpose	Scope	Most Senior Level Accountable	Availability	Applicability across Sustainability Statement
Integrated Policy	Ensuring product safety, quality, environmental sustainability, and responsible business practices across Vidrala's operations and value chain.	All operations, employees, suppliers, and stakeholders affected by Vidrala's activities.	Compliance Officer	Publicly available	▪ Consumer and customer safety ▪ Environmental impact and sustainability ▪ Ethical business conduct

Impacts, risks and opportunities

Our assessment has identified key information-related impacts affecting this stakeholder group. A material positive impact relates to product transparency, enabling consumers to make informed decisions regarding the use and disposal of glass packaging. This contributes to enhanced sustainability practices, including improved recycling and circular economy benefits. Conversely, we acknowledge a material negative impact risk associated with data security. A breach in customer data protection could lead to reputational damage and potential financial losses for Vidrala. While our direct interaction with end consumers is limited, ensuring robust data protection measures remains a priority to safeguard our customers' information and maintain trust.

Actions

To address these impacts, Vidrala has implemented internal controls to ensure transparency and security in product information and data management. Security audits and compliance checks are conducted regularly to mitigate risks related to data handling. Additionally, we continuously evaluate opportunities to enhance communication on the benefits of glass packaging and sustainability to further reinforce positive impacts.

Vidrala upholds ethical business practices by providing a whistleblowing channel accessible to all stakeholders, including customers, suppliers, and employees. This mechanism ensures that any concerns related to product integrity, ethical sourcing, or compliance violations can be reported and addressed effectively. We ensure the integrity of our customers' personal information by committing, at the group level, to comply with regulatory frameworks regarding data protection. To date, no infringements in this area have occurred within our organisation.

New logistics facilities in Marinha Grande, Portugal

Regarding after-sales responsibility, we have been continuously improving our internal procedures and channels. Currently, we handle potential complaints and improvement suggestions from our customers through the 'E-Gestiona' software. Within this framework, we receive non-conformities through various channels, which are initially addressed by the technical support or commercial team. After gathering preliminary information from different communication channels, the technical team takes samples, collects relevant data, and drafts a detailed report. Based on this initial draft, an administrator registers the issue on our platform, which operates through a questionnaire with predefined fields. This approach facilitates the collection of customer concerns and enables case history tracking, including information about the customer, the material, and the originating plant.

Once all mandatory fields are completed, a responsible individual is appointed to lead the coordination and resolution of the issue. This professional analyses the root cause of the dissatisfaction and shares it with the most relevant department, aiming to propose a satisfactory action plan that benefits all involved parties and mitigates any harm experienced by the customer. Upon resolution, the technical team communicates the solution to the dissatisfied customer. This entire process is properly recorded in our "E-Gestiona" platform.

With a strong commitment to our customers and continuous improvement, we have successfully resolved 100% of the complaints received.

The implementation of procedures and active monitoring by Vidrala in our customer communication channels has led to significant improvements in our key performance indicators (KPIs) related to the proportion of complaints addressed and the response time. In 2024, we achieved an average response time of 21, reaching a dissatisfaction index of 410 (vs 431 in 2023).

We also highlight the notable involvement and commitment of our customers in satisfaction surveys, with record participation in the survey's historical series. We achieved our highest Net Promoter Score (NPS) to date, reaching 63,6%. The surveys included key aspects such as product and packaging quality, complaint management, logistics, product delivery availability, and pricing, among others and it is monitored by the sales team. By participating in our survey, customers not only play an active role in improving our services but also contribute to a charitable cause, as Vidrala makes a donation to an NGO for each response received.

Lastly, in recent years, we have incorporated satisfaction metrics related to sustainability aspects. For instance, we ask about customers' awareness of our Sustainability Policy or whether they consider sustainability criteria in their collaborations with suppliers.

4.3.19 Spanish Law 11/2018 Indicators

1. Social Indicators

EMP2- Employees by age (#)

	2022	2023	2024
Under 30 years old	406	432	584
31-50 years old	2,249	2,449	2,986
Over 50 years old	1,018	1,195	1,316
TOTAL	**3,673**	**4,076**	**4,886**

EMP4 – Employees by professional category (#)

Total number and distribution of employees at the end of the reporting period

	2022	2023	2024
Directors	47	46	50
Line Manager	469	544	585
Other Employees	3,157	3,486	4,251
Total Employees	**3,673**	**4,076**	**4,886**

EMP6/7/8 – Indefinite contracts by by gender, age and professional category (#)

Annual average of permanent contracts (calculated as the average over 12 months)

	2022	2023	2024
Female	491	561	626
Male	2,960	3,276	4,023
TOTAL	**3,451**	**3,837**	**4,649**
Under 30 years old	314	333	488
31-50 years old	2,136	2,336	2,878
Over 50 years old	1,001	1,168	1,283
TOTAL	**3,451**	**3,837**	**4,649**
Directors	47	46	48
Line Manager	461	538	577
Other Employees	2,943	3,253	4,024
TOTAL	**3,451**	**3,837**	**4,649**

EMP9/10/11 – Temporary contracts by gender, age and professional category (#)

Annual average of temporary contracts (calculated as the average over 12 months)

	2022	2023	2024
Female	39	41	46
Male	183	198	191
TOTAL	**222**	**239**	**237**
Under 30 years old	92	99	99
31-50 years old	113	114	108
Over 50 years old	17	26	30
TOTAL	**222**	**239**	**237**
Directors	—	—	1
Line Manager	8	6	7
Other Employees	214	233	229
TOTAL	**222**	**239**	**237**

EMP12/13/14 – Part-time contracts by gender, age and professional category (#)

Annual average of temporary contracts (calculated as the average over 12 months)

	2022	2023	2024
Female	61	63	54
Male	80	88	72
TOTAL	**141**	**151**	**126**
Under 30 years old	12	12	5
31-50 years old	56	58	52
Over 50 years old	73	81	69
TOTAL	**141**	**151**	**126**
Directors	1	—	0
Line Manager	12	11	10
Other Employees	128	140	116
TOTAL	**141**	**151**	**126**

EMP15/ EMP16/EMP17 – Number of dismissals by gender, age and professional category (#)

Annual number of dismissals (sum over 12 months)

	2022	2023	2024
Female	5	5	11
Male	27	27	102
TOTAL	**32**	**32**	**113**
Under 30 years old	7	5	13
31-50 years old	16	19	49
Over 50 years old	9	8	51
TOTAL	**32**	**32**	**113**
Directors	1	—	—
Line Manager	3	2	8
Other Employees	28	30	105
TOTAL	**32**	**32**	**113**

EMP19/20/21 – Average remuneration by gender, age and professional category (euros)

Annual average remuneration (calculated as the 12-month average).

	2022	2023	2024
Female	40,268	44,240	45,482
Male	45,893	49,517	46,941
TOTAL	**45,083**	**48,738**	**46,740**
Under 30 years old	37,422	40,909	32,971
31-50 years old	45,729	49,119	44,813
Over 50 years old	46,712	50,787	57,241
TOTAL	**45,083**	**48,738**	**46,740**
Directors	181,795	211,971	258,869
Line Manager	72,730	76,137	79,211
Other Employees	38,940	42,308	39,786
TOTAL	**45,083**	**48,738**	**46,740**

EMP22 – Average remuneration of board members (including variable compensation, allowances, severance, contributions to long-term savings schemes, and any other payments) by gender

	2022	2023	2024
Female	99,796	107,131	109,934
Male	159,416	182,055	194,164
TOTAL	**139,543**	**154,810**	**163,535**

EMP23 – Average remuneration directors (including variable compensation, allowances, severance, contributions to long-term savings schemes, and any other payments) by gender

	2022	2023	2024
Female	146,335	174,425	216,509
Male	183,371	213,678	260,634
TOTAL	**181,795**	**211,971**	**258,869**

2. Health and Safety Indicators

OT2 – Number of absenteeism hours

Number of hours employees were absent from work without justification, excluding maternity/paternity leave, illnesses, or justified absences.

	2022	2023	2024
Total hours lost	567,547	501,008	553,235
Theoretical working hours	6,391,808	6,959,395	8,772,673
INDEX	**8.88 %**	**7.20 %**	**6.31 %**

SS2 – Number of work-related accidents by gender

Total number of accidents suffered by employees during the reporting period, including both those resulting in leave and those not requiring absence.

	2022	2023	2024
Work Accidents- Male	80	122	127
Work Accidents- Female	8	6	8
Work Accidents	**88**	**84**	**135**

SS3 – Frequency rate by gender

Calculation of the accident frequency rate for incidents resulting in leave. Number of accidents with leave per million hours worked:

	2022	2023	2024
Frequency rate Female	10	11	6
Frequency rate- Male	16	32	20

(No. of accidents / No. of hours worked) * 1,000,000

SS4 – Severity rate by gender

Calculation of the severity rate for accidents resulting in leave.

	2022	2023	2024
Severity rate Female	–	–	–
Severity rate- Male	–	–	1

(No. of lost workdays / No. of hours worked) * 1,000

SS5 – Occupational diseases by gender

Work-related illnesses developed as a result of professional activity.

	Conditional disposal		
	Male	Female	Total
2023	7	7	14
2024	10	5	15

3. Training and Social Contribution

FO2 – Total training hours by professional category

	2022	2023	2024
Directors	941	800	838
Line Manager	17,763	26,755	16,664
Other Employees	112,764	82,539	85,415
TOTAL	**131,468**	**110,094**	**102,917**

LCS3 – Contributions to foundations and non-profit organisations

	2022	2023	2024
Contributions to non-profit organisations	486,072	514,984	555,047

DS4 – Sponsorship and association activities

	2022	2023	2024
Sponsorship and association activities		133,556	198,252

4. Tax and Financial Disclosure

IF1 – Profits obtained per country

	2022	2023	2024
Spain	€200,718,818	€202,085,972	€359,691,525
Portugal	€8,202,459	€43,053,444	€27,507,002
Italy	€12,172,362	€12,172,362	€8,853,121
United Kingdom	€37,361,773	€51,787,447	€66,018,061
Irland	€2,156,000	€2,089,050	€1,847,436
France	€3,693,199	€4,060,645	€3,937,972
Brazil	€–	€–	€33,431,268

IF2 – Taxes on profits paid per country

	2022	2023	2024
Vidrala Total Group	€8,623,151	€45,021,450	€70,041,608

IF3 – Public subsidies received

	2022	2023	2024
Vidrala Total Group	€3,590,489	€6,112,821	€7,285,488

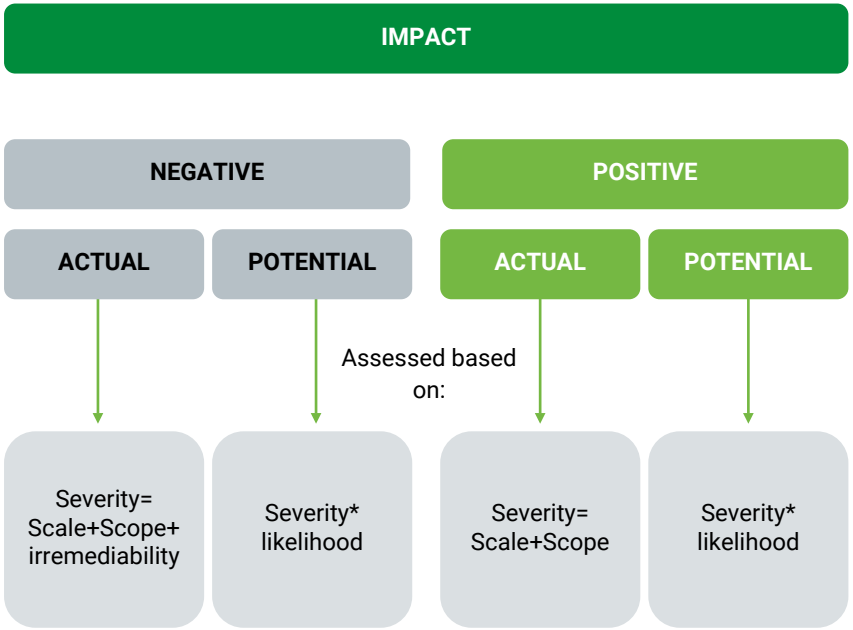
4.4 Annexes

Annex 1. Double Materiality Parameters

Impact materiality

Characteristics of calculation

- Scale / Scope / Remediability are assessed on a 0 to 5 range score.
- Likelihood is a numerical factor that will be translated into a proportion from 0 to 1.
- Positive impacts are normalised on a 15 score basis to mirror the negative scale (Scale + Scope) / 10 * 15.
- There is no netting impact (it a subtopic generates both positive and negative impact, only the most important impact will be assessed).



IMPACT RESULTS

>12	CRITICAL
10-12	SIGNIFICANT
8-10	IMPORTANT
5-8	INFORMATIVE
<5	MINIMAL

Financial materiality

- Any topic scoring than 50% would considered as material.
- Methodology aligned with IG 1 Guidelines for materiality assessment.
- Continuation of resources and reliance on relationship has been standardised and will developed in further analysis.

R/O PROBABILITY

<10%	10-30%	31-60%	61-80%	>80%
Very low	**Low**	**Medium**	**High**	**Very high**

SCOPE OF THE FINANCIAL EFFECT

	1	2	3	4	5
Reputation	Barely any coverage	National coverage with residual impact	National coverage with moderate impact	International and national coverage with moderate impact	International and national coverage with significant impact
Regulation	Minimum regulations that have a limited impact on the Group's operations and costs	Regulations that imply adjustments in the Group's operations and may generate some additional costs	Regulations with a significant impact on operations and costs	Restrictive regulations for the Group's operations that generate a substantial cost in terms of compliance and adaptation	Very restrictive regulations that endanger the viability of the Group

1.1 Material impacts

Topic	Sub topic	Source	Stakeholder Involved	Time horizon	Description of impacts linked to this topic	Type	
E1-Climate Change	Climate change mitigation	Upstream	Environment, communities, suppliers	Long term	Procurement of low-emission intermediate products enables suppliers to achieve their emission targets	Actual	Positive Impact
	Climate change mitigation	Own operations	Environment	Medium term	Contribution to global warming due to high CO2e emissions in logistics, in the transport of goods and intermediate products as well as the mobility of employees (business trips).	Actual	Negative Impact
	Climate change mitigation	Own operations	Environment	Medium term	Contribution to global warming through direct CO2e emissions from our own energy-intensive processes	Potential	Negative Impact
	Climate change mitigation	Upstream	Environment, communities, suppliers	Long term	Engaging and influencing suppliers to reduce their own GHG emissions in their direct operations, which will have a knock-on impact through the value chain.	Actual	Positive Impact
	Climate change mitigation	Own operations	Environment	Medium term	Lower GHG emissions in transport and logistics e.g., via more efficient/ newer vehicles or even use of BEVs and optimization of transport structures and processes, conversion to railway transport, reduction and / or omission of air transport	Actual	Positive Impact
	Climate change mitigation	Own operations	Environment	Medium term	Lower GHG emissions in operations (via more efficient compound (refrigeration) systems, natural cooling agents with lower GWP, waste heat recovery, certified energy management systems, LED lighting),	Actual	Positive Impact
	Energy	Upstream	Environment	Medium term	High energy consumption due to energy-intensive manufacturing processes in the supply chain.	Actual	Negative Impact
	Energy	Own operations	Environment	Short term	Increasing the demand for renewable energy sources through exclusive/increased purchase of electricity from renewable energy sources	Actual	Positive Impact
	Energy	Upstream	Environment	Medium term	Negative contribution to the energy mix due to the use and purchase of fossil fuels for own businesses processes, particularly with the shift to more energy intensive fuel in 2022, consequently contributes to global warming.	Actual	Negative Impact
	Energy	Own operations	Environment, communities	Short term	Contribution to the expansion of renewable energies through the use of our own photovoltaic (PV) systems.	Actual	Positive Impact

Topic	Sub topic	Source	Stakeholder Involved	Time horizon	Description of impacts linked to this topic	Type	
E2-Pollution	Pollution of air	Own operations	Environment, Communities,	Long term	Pollution of air through emissions of production off-gases (SOx, NOx, PM) and of VOC (solvents, propellants escaping from filling / production processes) in own operations and supplier operations may lead to significant negative impact on air quality	Potential	Negative Impact
	Pollution of air	Own operations	Environment, Communities,	Medium term	By gradually converting the vehicle fleet to hybrid, electric or fuel cell vehicles, Vidrala Group contributes to the reduction of air emissions.	Actual	Positive Impact
	Pollution of water	Downstream	Clients, Environment	Short term	Innovative products such as technological alternatives and use of better and less harmful ingredients can positively impact society through reduced pollution of water and thus, lower the potential to harm human health.	Actual	Positive Impact

Topic	Sub topic	Source	Stakeholder Involved	Time horizon	Description of impacts linked to this topic	Type	
E3-Water	Water consumption	Own operations	Environment, communities	Short term	Positive contribution to the water cycle through the recuperation of water from process waste throughout our operations	Actual	Positive impact
	Water discharges in water bodies and in the oceans	Own operations	Environment, communities	Medium term	High water quality of Vidrala Group's wastewater discharge due to extensive water treatment allows water distribution to partners and communities ensuring water use for different purposes.	Actual	Positive Impact
	Water Use	Own operations	Environment	Medium term	Vidrala Group's potential to use alternative water consumption sources (water circularity, reusing of water, grey water,...) as rainwater and groundwater reduces ensures continued access to safe and affordable drinking water and sanitation for local communities	Actual	Positive Impact
	Water Use	Own operations	Environment, communities	Short term	Positive contribution to the water cycle through the implementation of water-saving programs throughout our operations.	Actual	Positive Impact
	Water withdrawals	Upstream	Environment, communities	Short term	Water used for the extraction of raw materials and its processing such as soda and sand	Actual	Negative impact

Topic	Sub topic	Source	Stakeholder Involved	Time horizon	Description of impacts linked to this topic	Type	
E5-Circular economy	Resource outflows related to products and services	Downstream	Environment, Clients	Medium term	Extension of the product life cycle through long service life and the offer of take-back systems	Actual	Positive Impact
	Resource outflows related to products and services	Own operations	Environment, Clients	Short term	Direct influence on the recyclability of the products and their material intensity through the design of your own products	Actual	Positive Impact
	Resources inflows, including resource use	Upstream	Environment, Society, Clients	Medium term	Expansion of recycled and circularity solutions in the supply chain through increased sourcing of such intermediate products	Actual	Positive Impact
	Resources inflows, including resource use	Own operations	Environment, Clients	Short term	Increasing resource scarcity through the use of non-recycled and non-recyclable plastic for packaging.	Actual	Negative Impact
	Resources inflows, including resource use	Own operations	Environment	Medium term	Increasing the scarcity of resources through the use of non-renewable raw materials (sand and soda ash).	Actual	Negative Impact
	Resources inflows, including resource use	Own operations	Environment, Clients	Short term	Direct influence on the recyclability of the products and their material intensity through the design of the company's own production machines.	Actual	Positive Impact
	Resources inflows, including resource use	Own operations	Environment, Society	Medium term	Decoupling Vidrala Group's business growth from its resource demand and packaging footprint could enable transparent information and decision-making of stakeholders/ investors, thus positively impacting the reduction of packaging and plastic use.	Actual	Positive Impact
	Waste	Own operations	Environment, Society	Short term	Hazardous waste landfilled or incinerated	Actual	Negative impact
	Waste	Own operations	Environment, Society	Short term	Non-hazardous waste landfilled or incinerated	Actual	Negative impact
	Waste	Own operations	Environment, Society	Medium term	Vidrala Groups efforts to achieve zero waste to landfill and zero waste to energy recovery of its own operations prevents pollution from extraction, manufacturing and disposal and conserves natural resources, thereby positively impacting biodiversity.	Actual	Positive Impact
	Waste	Own operations	Environment, Society	Medium term	Negative environmental and climate impacts due to the improper disposal of operating materials	Actual	Negative Impact

Topic	Sub topic	Source	Stakeholder Involved	Time horizon	Description of impacts linked to this topic	Type	
E4-Biodiversity	Direct impact drivers of biodiversity loss	Own operations	Environment	Short term	The extraction of stone, sand and clay extracts and erodes these abiotic resources during the mining and quarrying process, which can disturb or negatively affect species and lead to habitat degradation and fragmentation.	Actual	Negative Impact
	Impacts and dependencies on ecosystem services	Own operations	Environment	Long term	Finance conservation projects and work with local communities to make a combined positive impact, promoting biodiversity, educating and engaging stakeholders.	Actual	Positive Impact
	Impacts on the state of species	Downstream	Environment	Medium term	Risk that Vidrala Group's glass or plastic packaging seeps into soils or ocean, and could result in a loss of land biodiversity or marine biodiversity.	Actual	Negative Impact

Topic	Sub topic	Source	Stakeholder Involved	Time horizon	Description of impacts linked to this topic	Type	
G1-Business Conduct	Corruption and bribery	Own operations	Employees	Short term	Prevention and education about illegal behaviour, such as corruption and bribery, through mandatory training and information services, leads to distinctive ethical corporate behaviour. This leads the Group to maintain a fair and competitive market.	Actual	Positive Impact
	Protection of whistle-blowers	Own operations	Employees	Short term	Demonstrate a commitment to important issues in associations, while building trust and acceptance by protecting whistleblowers when reporting misconduct, as expected by law and beyond.	Actual	Positive Impact

Topic	Sub topic	Source	Stakeholder Involved	Time horizon	Description of impacts linked to this topic	Type	
S1-Own Workforce	Equal treatment and opportunities for all	Own operations	Employees	Short term	Higher employability or improvement in the integration of women or minority groups	Actual	Positive impact
	Equal treatment and opportunities for all	Own operations	Employees	Short term	Vidrala Group's diverse and inclusive working environment impacts the employees' sense of belonging and mental health. Attracting and maintaining top talent due to diverse and inclusive working environment at Vidrala reduces costs of re-hiring	Actual	Positive Impact
	Equal treatment and opportunities for all	Own operations	Employees	Medium term	Higher employability or improvement in the integration of persons with disabilities	Actual	Positive impact
	Equal treatment and opportunities for all	Own operations	Employees	Short term	By recruiting more women for top managerial positions, and including more women in networking activities, trainings, and mentoring programs in the own workforce, Vidrala Group can foster a cultural change worldwide toward gender parity, diversity and inclusion	Actual	Positive Impact
	Equal treatment and opportunities for all	Own operations	Employees	Short term	Through active recruiting, internal projects, etc. focused on underrepresented and marginalised groups, Vidrala Group can increase their visibility in the general population, and create a sense of belonging.	Actual	Positive Impact
	Working conditions	Own operations	Employees	Medium term	Vidrala Group support good work-life balance and offering benefits such as family related leave or access to childcare, supports employee wellbeing.	Actual	Positive Impact
	Working conditions	Own operations	Employees	Short term	Vidrala Group promoting effective social dialogue enables employees to share their voice and may lead to better working conditions.	Actual	Positive Impact
	Working conditions	Own operations	Employees	Medium term	Providing long-term and secure employment for employees through permanent contracts	Actual	Positive Impact
	Working conditions	Own operations	Employees	Short term	Positive contribution to the health and quality of life of employees through the provision of health services that go beyond the necessary occupational safety (e.g. promotion of sports activities, contributions to mental health)	Actual	Positive Impact
	Working conditions	Own operations	Employees	Medium term	Enabling a healthy life through (above-average) good working conditions and active promotion of employees	Actual	Positive Impact
	Working conditions	Own operations	Employees	Short term	By respecting collective bargaining, employee representatives (incl works council) and the freedom of association, Vidrala Group positively impacts their own workforce working conditions.	Actual	Positive Impact

Topic	Sub topic	Source	Stakeholder Involved	Time horizon	Description of impacts linked to this topic	Type	
S2-Workers in the value chain	S2 - Equal treatment and opportunities for all	Upstream	Supply chain workers	Short term	Ensuring equal treatment of comparable employees in the upstream supply chain through strict criteria in the Supplier Code of Conduct (potential)	Actual	Positive Impact
	S2 - Equal treatment and opportunities for all	Upstream	Supply chain workers	Short term	Increasing inequality between men and women due to more men being in executive positions, and operators in hot end in the factory than woman, leading to a gender pay gap in the supply chain.	Actual	Negative Impact
	S2 - Equal treatment and opportunities for all	Upstream	Supply chain workers	Medium term	By upholding Vidrala Group's Code of Conduct (CoC), inclusion and diversity for the suppliers, Vidrala Group can positively impact the physical and mental health of workers along the value chain.	Actual	Positive Impact
	S2 - Equal treatment and opportunities for all	Upstream	Supply chain workers	Long term	Contribution to good practices in diversity and inclusion in our supply chain	Actual	Positive Impact
	S2 - Other work-related rights	Upstream	Supply chain workers	Short term	By upholding Vidrala Group Code of Conduct for suppliers, and ensuring supplier due diligence Vidrala Group can positively impact and affirm the fundamental human rights (incl. Gender equality, no child labour, and equal pay for equal value, measures agai+	Actual	Positive Impact
	S2 - Working conditions	Upstream	Supply chain workers	Short term	Improve workplace safety in the upstream supply chain through regular safety inspections at suppliers' production sites	Actual	Positive Impact
	S2 - Working conditions	Upstream	Supply chain workers	Short term	Vidrala Group's suppliers are expected to have Health & Safety management systems in place to contribute to improving employees' health, safety and wellbeing at the workplace.	Actual	Positive Impact
	S2 - Working conditions	Upstream	Supply chain workers	Short term	Vidrala Group's responsible sourcing process that expects suppliers to promote effective social dialogue with workers in the value chain or their representatives, enables workers to share their opinions and concerns, leading to better working conditions	Actual	Positive Impact
	S2 - Working conditions	Upstream	Supply chain workers	Short term	Vidrala Group's responsible sourcing process expects suppliers to respect collective bargaining and the freedom of association rights for employees which leads to open and constructive dialogue and better working conditions.	Actual	Positive Impact
	S2 - Working conditions	Upstream	Supply chain workers	Long term	Promoting fair working conditions and adequate wages through legally regulated requirements in the Purchasing Conditions or in the Code of Conduct	Actual	Positive Impact

Topic	Sub topic	Source	Stakeholder Involved	Time horizon	Description of impacts linked to this topic	Type	
S4-Consumers and end-users	Information-related impacts for consumers and/or end-users	Downstream	Consumers	Short term	Providing transparent product information enables consumers to make informed decisions about the choice and use of products and services so that they meet their specific needs	Actual	Positive Impact

1. Material risks and opportunities ***(pages 144-147 of document EINF 2024_VSpanish)***

Annex: Relationship between Law 11/2018 and CSRD (*pages 148-157 of document EINF 2024_VSpanish*)

Annex 3: List of data points included in the transversal rules and in thematic rules derived from other EU legislation (*pages 158-162 of document EINF 2024_VSpanish*)

1.2 Risks and opportunities

Topic	Sub topic	Source	Stakeholder	Description	Type
E1 Climate change	Climate change mitigation	Downstream	Environmental manager (group perspective) sustainability manager	Competitive advantage: Effective communication of climate measures leads to reputation enhancement that causes the Groups customer base to increase. This would lead to increased sales and revenue.	Opportunity
	Climate change mitigation	Downstream	Environmental manager (group perspective) sustainability manager	Competitive advantage & market opportunity: Demand for sustainable & innovative customer products (e.g., providing 100% recycled glass bottles, Net Zero glass bottle) is increasing.	Opportunity
	Energy	Upstream	Environmental manager (group perspective) sustainability manager	Due to the dependence on individual energy sources, there is uncertainty in the energy supply for Vidrala Group. This can lead to operational and financial risks (example: gas supply in spring 2022). The cost and security of energy supply will impact Vidrala	Risk
	Energy	Own operations	Environmental manager (group perspective) sustainability manager	High energy costs due to the increase in the price of fossil fuels (and in the future: higher taxation of fossil fuels).	Risk
	Climate change mitigation	Own operations	Environmental manager (group perspective) sustainability manager	Increased costs due to increasing regulatory requirements and measures to be implemented by Vidrala Group (e.g. Increase in scope of EU ETS, UK ETS, the price of CO2 certificates, or the price of imports due to the European CO2 Border Adjustment Mechanism+	Risk
	Climate change mitigation	Own operations	Environmental manager (group perspective) sustainability manager	Major increase in REGOS, PPA and on-site renewable energy generation spending is required to increase the use of renewable energy across Vidrala Group.	Risk
	Climate change adaptation	Upstream	Environmental manager (group perspective) sustainability manager	A dependence on finite materials and resources that are becoming less available due to accelerated climate change - e.g. water in some regions - can lead to unplanned or unbudgeted costs.	Risk
	Climate change adaptation	Own operations	Environmental manager (group perspective) sustainability manager	Due to the changing climatic conditions and more solar radiation, the power capacity of Vidrala Group's photovoltaic systems will be increased; in addition, the demand and profitability of PV electricity are increasing. This represents a financial opportu+	Opportunity
	Energy	Own operations	Environmental manager (group perspective) sustainability manager	By expanding its own photovoltaic systems and investing in other low-emission energy systems, Vidrala Group can save costs, generate additional income and expand its energy independence.	Opportunity
	Climate change mitigation	Own operations	Environmental manager (group perspective) sustainability manager	Energy efficiency measures at Vidrala Group's production sites and offices could entail considerable adaption costs, increasing operational costs significantly.	Risk

Topic	Sub topic	Source	Stakeholder	Description	Type
E2 Pollution	Pollution of air	Own operations	Environmental manager (group perspective) sustainability manager	Environmental regulations are becoming stricter, leading to costly measures to improve local air quality	Risk

Topic	Sub topic	Source	Stakeholder	Description	Type
E4 Biodiversity	Impacts on the extent and condition of ecosystems	Upstream	Sustainability manager	New or changing worldwide government regulations with regard to ecosystem conditions could require to adjust operations which could result in a significant increase in operating or production costs	Risk

Topic	Sub topic	Source	Stakeholder	Description	Type
E5 Circular economy	Resources inflows, including resource use	Own operations	Sustainability manager	Use of secondary raw material could allow Vidrala Group to attract more customers and meet demand of sustainable production, thus potentially increasing revenues.	Opportunity
	Resources inflows, including resource use	Own operations	Sustainability manager	Optimizing production with resource-efficient technologies may lead to lower operating costs as government subsidies may become available to stimulate innovation and lower resource use e.g. through green and digital stimulus programs, research and develop+	Opportunity
	Waste	Own operations	Sustainability manager	Costs of prevention/mitigation efforts are anticipated to achieve zero waste targets by reuse and refill along all processes of production and in the supply chain.	Risk

Topic	Sub topic	Source	Stakeholder	Description	Type
G1 Governance	Management of relationships with suppliers including payment practices	Upstream	Internal auditor	Strengthening long-term business relationships through reliable supply chain management	Opportunity
	Corporate culture	Own operations	Internal auditor	Increasing the attractiveness of Vidrala Group through value-based corporate culture as an employer leads to talent retention, reducing recruitment costs for the business.	Opportunity
	Political engagement and lobbying activities	Own operations	Internal auditor	Demonstration of a commitment to important issues through associations, political engagement and lobbying to ensure that business and employee rights are upheld.	Opportunity

Topic	Sub topic	Source	Stakeholder	Description	Type
S1 Own workforce	Equal treatment and opportunities for all	Own operations	HR Director Sustainability manager	Opportunity to improve efficiency, employee engagement and reputation through the promotion of a diverse, healthy and skilled workforce	Opportunity
	Equal treatment and opportunities for all	Own operations	HR Director Sustainability manager	Increasing innovation and productivity through competent, motivating and diverse leadership and teams.	Opportunity
	Equal treatment and opportunities for all	Own operations	HR Director Sustainability manager	Enhanced reputation and brand image (e.g., Diversity Mark Accreditation, Northern Ireland Responsible Business of the Year Award in 2022) enables Vidrala to reach new consumer segments and increase revenues	Opportunity
	Equal treatment and opportunities for all	Own operations	HR Director Sustainability manager	Effectively trained employees can lead to an increase in efficiency thus decreasing operational costs due to employee accidents or absences from work because of health issues.	Opportunity
	Working conditions	Own operations	HR Director Sustainability manager	Collective bargaining supports the resolution of issues in a timely manner, improving employee retention, productivity (also in time spent in addressing grievances) and decreasing absenteeism.	Opportunity
	Equal treatment and opportunities for all	Own operations	HR Director Sustainability manager	Adapting/re-building Vidrala sites into an inclusive environment needs initial investments (e.g., disability inclusion).	Risk
	Equal treatment and opportunities for all	Own operations	HR Director Sustainability manager	By investing in diversity, equity and inclusion measures such within own operations such as in recruitment, or increasing visibility and support for persons with disabilities, can lead to more innovation through different perspectives, lead to increase it+	Opportunity
	Equal treatment and opportunities for all	Own operations	HR Director Sustainability manager	Attracting and maintaining top talent due to access to opportunities at Vidrala Group reduces costs of re-hiring	Opportunity
	Working conditions	Own operations	HR Director Sustainability manager	Risk of absenteeism and conflicts with personnel arising from negotiations with labor representatives and their effect on operations, results and reputation.	Risk
	Working conditions	Own operations	HR Director Sustainability manager	Risk of high staff turnover and inability to attract the best talent due to comparatively worse working conditions or lack of availability of skilled workforce and its impact on the decline in quality, revenue and EBITDA.	Risk

Topic	Sub topic	Source	Stakeholder	Description	Type
S2 Workers in the supply chain	S2 - Working conditions	Upstream	HR Director Sustainability manager	Healthy employees at Vidrala Group's suppliers due to an implemented H&S management system are more productive and innovative, contributing to Vidrala Group's performance.	Opportunity
	S2 - Equal treatment and opportunities for all	Upstream	HR Director Sustainability manager	Efficiently trained supply chain employees can lead to an increase in efficiency along the global value chain. Thus, decreasing operational costs due to employee accidents or absences from work because of health issues.	Opportunity

Annex 2. Law 11/2018 and CSRD

Information requested by Law 11/2018	Materiality	Reference to DR (DP) from CSRD	Comment justification	Page
General Information				
A brief description of the business model including its business environment, organisation and structure	Material	(ESRS 2) SBM-1		75
Markets in which it operates	Material	(ESRS 2) SBM-1		75
Objectives and strategies of the organisation	Material	(ESRS 2) SBM-1 MDR-P MDR-A MDR-T		75
Main factors and trends that may affect its future development	Material	(ESRS 2) SBM-2 SBM-3 IRO-1IRO-2		75
Reporting framework used	Material	ESRS 1 ESRS 2		68
Principle of materiality	Material	(ESRS 2) SBM-2 SBM-3 IRO-1 IRO-2		80
Environmental Issues				
Management approach: description and results of policies related to environmental issues	Material	(ESRS 2) SBM-1 MDR-P MDR-A MDR-T		75
Detailed general information				
Detailed information on current and foreseeable effects of activities on the environment and health	Material	(ESRS 2) SBM-3 IRO-1 E1-1 E2-1 E3-1 E4-1 E5-1 E2-6 AR (31 b)		80
Environmental assessment or certification procedures	Material	E4-2 AR (17 d) E1-2 E2-2 E3-2 E4-2 E5-2		80
Resources dedicated to the prevention of environmental risks	Material	(ESRS 2) SBM-3 E1-9 E2-5 E3-5 E4-6 E5-6		80
Application of the precautionary principle	Material	(ESRS 2) SBM-3 E1-9 E2-5 E3-5 E4-6 E5-6		80
Amount of provisions and guarantees for environmental risks	Material	(ESRS 2) SBM-3 E1-9 E2-5 E3-5 E4-6 E5-6		80

Information requested by Law 11/2018	Materiality	Reference to DR (DP) from CSRD	Comment justification	Page
Pollution				
Measures to prevent, reduce or repair emissions that affect the environment	Material	E2-2		112
Including noise and light pollution	Not material	Not applicable		
Circular economy and waste prevention and management				
Waste Generated	Material	E5-5 (37a) E5-5 39		123
Prevention measures, recycling, reuse, others Waste recovery and disposal methods	Material	E5-2 E5-5		123
Actions to combat food waste	Not material	Not applicable		
Sustainable use of resources				
Water consumption and supply in accordance with local limitations	Material	E3-2 E3-4		117
Consumption of raw materials and measures to improve their efficiency	Material	E5-2 E5-4		117
Direct and indirect energy consumption	Material	E1-5 (37) E1-5 (38)		117
Measures taken to improve efficiency energetic	Material	E1-2 E1-5		117
Use of renewable energy	Material	E1-5 (37) E1-5 (39)		117
Climate change				
Greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces	Material	E1-6		95
Measures taken to adapt to the consequences of climate change	Material	E1-1 (SBM-3) E1-3		95
Voluntarily established reduction targets medium and long term to reduce greenhouse gas emissions and the means implemented for this purpose	Material	E1-1 E1-4		95

Information requested by Law 11/2018	Materiality	Reference to DR (DP) from CSRD	Comment justification	Page
Protection of Biodiversity				
Measures taken to preserve or restore biodiversity	Material	E4-1 E4-3E4-5		95
Impacts caused by activities or operations in protected areas	Material	E4-1 (SBM-3) E4-1 (IRO-1)E4-3E4-5		95
Social and Personnel Issues				
Management approach: description and results of the policies related to these issues as well as the main risks related to these issues linked to the group's activities	Material	(ESRS 2) SBM-1 MDR-P MDR-A MDR-T		75
Employment				
Total number and distribution of employees by country, sex, age and classification	Material	S1-6 (50 a, b) S1-9 (66 b) **Total number and distribution of employees by professional category Indicator not included in ESRS	The information to be reported according to CSRD does not fit with the EMP indicators of Law 11/2018, since they are broken down differently, and the same information cannot be verified . The conclusions of the analysis classify this indicator as "partially collected in ESRS" because within what is required by CSRD, in this group of indicators, the indicator "Total number and distribution of employees by professional category" does not appear in what is required by CSRD.	140

Information requested by Law 11/2018	Materiality	Reference to DR (DP) from CSRD	Comment justification	Page
Total number and distribution of types of employment contracts and annual average of permanent contracts, temporary contracts and part-time contracts by sex, age and professional classification	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not fit with the EMP indicators of Law 11/2018, since they are broken down differently, and the same information cannot be verified. CSRD does not require disclosure of information regarding annual averages and their breakdowns. It only refers to averages in the description of the methodologies in S1-6 (50 d ii), where it is mentioned that there is the possibility of using them as a calculation and data collection methodology to obtain the information.	140
Number of dismissals by sex, age and professional classification	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not require the disclosure of the total number of dismissals carried out nor their breakdown by sex, age and professional category)	140
Average remuneration and its evolution broken down by sex, age and professional classification or equal value	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not require the disclosure of the average remuneration of its workers, nor its evolution broken down by sex, age or professional category.	140
Wage gap, remuneration for equal positions or average for society	Material	S1-16		
Average remuneration of directors and managers, including variable remuneration, allowances, compensation, payment to long-term savings pension systems and any other payment broken down by sex	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not require the disclosure of the average remuneration of directors or managers.	140
Implementation of work disconnection policies	Material	S1-1		140
Number of employees with disabilities	Material	S1-12		140
Organisation of Work				
Organisation of working time	Material	S1 (SBM-3) S1-1S1-8S1-11S1-15		
Number of hours of absenteeism	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not require the disclosure of the number of hours of absenteeism.	140
Measures aimed at facilitating conciliation and co-responsibility	Material	S1-4 S1-15		140

Information requested by Law 11/2018	Materiality	Reference to DR (DP) from CSRD	Comment justification	Page
Health and Safety				
Health and safety conditions at work	Material	S1-1 S1-14		140
Workplace accidents, frequency, severity and occupational diseases	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not require the breakdown by gender of the information on the number of occupational accidents and the formulas for calculating the rates are different from those required by Law 11/2018. Nor is the disclosure of information on the number of illnesses caused as a result of work activity required.	140
Social Relations				
Organisation of social dialogue included Procedures for informing, consulting and negotiating with staff	Material	S1-2 S1-2 AR (24, 25) S1-3 S1-2 AR (28, 29)		140
Percentage of employees covered by collective bargaining agreement by country	Material	S1-8 S1-8 AR		140
Review of collective agreements, particularly in the field of health and safety at work	Material	S1-8 S1-14 (88 a)		140
Mechanisms and procedures that the company has in place to promote employee involvement in the management of the company, in terms of information, consultation and participation	Material	S1-1 S1-2 S1-3		140
Training				
Policies implemented in the field of training	Material	S1-1 S1-1 AR (17 a, c, f, h) S1-13		140
Total number of training hours by professional category	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not fit with the FO indicators of Law 11/2018, since they are broken down differently, the breakdown by professional categories is not included and the methodology for calculating hours is not the same (average hours vs. total hours).	162

Information requested by Law 11/2018	Materiality	Reference to DR (DP) from CSRD	Comment justification	Page
Universal Accessibility				
Universal accessibility for people with disabilities	Material	S1-1 AR (17 d) S2-2 (23) S4-2 (21) S4-5 AR (44) S4 (SBM-3 10 c)		140
Equality				
Measures taken to promote equal treatment and opportunities between women and men	Material	S1-2 S1-3 S1-4 S1-15 S1-16		140
Equality plans, measures adopted to promote employment, protocols against sexual and gender-based harassment	Material	S1-1 (20, 24 a,b ,c) S1-1 AR (14, 17 b) S1-17 (102, 103) S1-17 AR (104 b,c)		140
Integration and universal accessibility for people with disabilities	Material	S1-1 AR (17 d) S2-2 (23) S4-2 (21) S4-5 AR (44) S4 (SBM-3 10 c)		140
Policy against all types of discrimination and, where appropriate, diversity management	Material	S1-1 S1-2 S1-3 S1-4		140
Respect for Human Rights				
Management approach: description and results of the policies related to these issues as well as the main related risks	Material	(ESRS 2) SBM-1 MDR-P MDR-A MDR-T		70

Information requested by Law 11/2018	Materiality	Reference to DR (DP) from CSRD	Comment justification	Page
Application of due diligence procedures	Material	(ESRS 2) GOV-4 (ESRS 2) MDR-P S1-1 S1-17 S2-1 S3-1 S4-1		70
Application of due diligence procedures in the field of human rights and prevention of risks of human rights violations and, where appropriate, measures to mitigate, manage and remedy possible abuses committed	Material	(ESRS 2) MDR-A (ESRS 2) MDR-T S1-2 / S1-3 / S1-4 S2-2 / S2-3 / S2-4 S3-2 / S3-3 / S3-4 S4-2 / S4-3 / S4-4		70
Complaints about cases of human rights violations	Material	S1-17 S2-4 (36) S3-4 (36) S4-4 (35)		140
Promotion and enforcement of the provisions of the ILO core conventions relating to respect for freedom of association and the right to collective bargaining	Material	S1-8		140
Elimination of discrimination in employment and occupation	Material	S1-1 (24) S2-1 (17)		140
Elimination of forced or compulsory labour	Material	S1-1 (22) S2-1 (18) S3-1 (16) S4-1 (16)		140
Effective abolition of child labour	Material	S1-1 (22) S2-1 (18) S3-1 (16) S4-1 (16)		140
Fight against corruption and bribery				
Management approach: description and results of the policies related to these issues as well as the main risks related to these issues linked to the group's activities	Material	(ESRS 2) SBM-1 MDR-P MDR-A MDR-T		70

Information requested by Law 11/2018	Materiality	Reference to DR (DP) from CSRD	Comment justification	Page
Information relating to the fight against corruption and bribery				
Measures taken to prevent corruption and bribery	Material	G1-1 G1-3 G1-4		70
Measures to combat money laundering	Material	G1-1 G1-3 G1-4		70
Contributions to foundations and non-profit entities	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not require the listing of financial contributions to foundations and non-profit entities.	70
Information about the Company				
Management approach: description and results of the policies related to these issues as well as the main risks related to these issues linked to the group's activities	Material	(ESRS 2) SBM-1 MDR-P MDR-A MDR-T		75
Company commitments to sustainable development				
Impact of the company's activity on employment and local development	Material	S3-1 S3-2 S3-3 S3-4 S3-5		Not material
Impact of society's activity on local populations and the territory	Material	S3-1 S3-2 S3-3 S3-4 S3-5		Not material
Relations maintained with local community stakeholders and the modalities of dialogue with them	Material	S3-1 S3-2 S3-3 S3-4 S3-5		Not material
Partnership or sponsorship actions		Indicator not included in ESRS	The information to be reported according to CSRD does not require the listing of affiliations to non-profit associations and acts of sponsorship of social or environmental causes.	162

Information requested by Law 11/2018	Materiality	Reference to DR (DP) from CSRD	Comment justification	Page
Outsourcing and Suppliers				
Inclusion of social, gender equality and environmental issues in purchasing policy	Material	SBM-1 (42) MDR-P (65 b) S2-1 18 S2-4 AR (30) S3-4 AR (27) S4-4 AR (27)		160
Consideration in relationships with suppliers and subcontractors of their social and environmental responsibility	Material	SBM-1 (42) MDR-P (65 b) S2-1 18 S2-4 AR (30) S3-4 AR (27) S4-4 AR (27)		160
Monitoring and audit systems and their results	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not require details on the number of audits or other monitoring systems carried out on suppliers, nor the results thereof.	160
Consumers				
Measures to ensure the health and safety of consumers	Material	S4-1 S4-2 S4-3 S4-4		160
Complaint systems, complaints received and their resolution	Material	S4-3 S4-4		160

Information requested by Law 11/2018	Materiality	Reference to DR (DP) from CSRD	Comment justification	Page
Tax Information				
The benefits obtained country by country	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not require details on the benefits obtained country by country.	162
Taxes on profits paid	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not require details on the benefits obtained country by country.	162
Public subsidies received	Material	Indicator not included in ESRS	The information to be reported according to CSRD does not require details on the benefits obtained country by country.	162
Regulation (EU) 2020/852 - Taxonomy ***Qualitative information***				
Accounting policy	Material	Regulation (EU) 2020/852 Regulation (EU) 2021/2178		130
Compliance assessment of Regulation (EU) 2020/852	Material	Regulation (EU) 2020/852 Regulation (EU) 2021/2178		130
Contextual information	Material	Regulation (EU) 2020/852 Regulation (EU) 2021/2178		130
Quantitative information				
Eligibility and alignment of revenue volume	Material	Regulation (EU) 2020/852 Regulation (EU) 2021/2178 Regulation (EU) 2021/2139 Regulation (EU) 2023/2486		130
CapEx Eligibility and Alignment	Material	Regulation (EU) 2020/852 Regulation (EU) 2021/2178 Regulation (EU) 2021/2139 Regulation (EU) 2023/2486		130
OpEx Eligibility and Alignment	Material	Regulation (EU) 2020/852 Regulation (EU) 2021/2178 Regulation (EU) 2021/2139 Regulation (EU) 2023/2486		130

Annex 3. List of data points included in cross-cutting standards and thematic standards derived from other EU legislation

	Disclosure requirement and related data point		Pillar 3 Reference	Reference to the Regulation on benchmarks	Page
ESRS 2: General information					
Basis for preparation	BP-1	General basis for the preparation of the sustainability statement			68
	BP-2	Information regarding specific circumstances			68
Gobernanza	GOV-1	The role of the administrative, management and supervisory bodies		Commission Delegated Regulation (EU) 2020/1816 (5), Annex II	70
	GOV-1			Delegated Regulation (EU) 2020/1816, Annex II	70
	GOV-2	Information provided to the administrative, management and supervisory bodies			70
	GOV-3	Integrating sustainability-related performance into incentive systems			70
	GOV-4	Statement on due diligence			70
	GOV-5	Risk management and internal controls for disclosure of sustainability information			70
Strategy	SBM-1	Strategy, business model and value chain	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6), Table 1: Qualitative information on environmental risk and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II	75
	SBM-2	Interests and opinions of stakeholders			75
	SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model			75

	Disclosure requirement and related data point		Pillar 3 Reference	Reference to the Regulation on benchmarks	Page
Management of impacts, risks and opportunities	IRO-1	Description of the processes for determining and assessing material impacts, risks and opportunities			79
	IRO-2	Disclosure requirements set out in the ESRS covered by the company's sustainability statement			79
Minimum disclosure requirement	MDR-P	MDR-P Policies adopted to manage material sustainability issues		References have been included throughout the different sections	
	MDR-A	Actions and resources in relation to material sustainability issues		References have been included throughout the different sections	
	MDR-M	Parameters in relation to material sustainability issues		References have been included throughout the different sections	
	MDR-T	Monitoring the effectiveness of policies and actions through goals		References have been included throughout the different sections	
ESRS E1: Climate change					
Governance	ESRS 2 GOV-3	Integrating sustainability-related performance into incentive systems			70
Strategy	ESRS 2 SBM-3	Material incidents, risks and opportunities and their interaction with the strategy and business model			70
	E1-1	Climate change mitigation transition plan		Regulation (EU) 2021/1119, Article 2, paragraph 1	95
	E1-1	Companies excluded from the Paris Agreement harmonised benchmarks, paragraph 16(g)	Article 449(a) of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking portfolio – Climate-related transition risk: credit quality of exposures by sector, issuance and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1, points (d) to (g), and Article 12, paragraph 2	95

	Disclosure requirement and related data point		Pillar 3 Reference	Reference to the Regulation on benchmarks	Page
Strategy	ESRS IRO 1	Description of processes to determine and assess material climate-related impacts, risks and opportunities			95
	E1-2	Policies related to climate change mitigation and adaptation			95
	E1-3	Actions and resources related to climate change policies			95
	E1-4	Goals related to climate change mitigation and adaptation	Article 449(a) of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking portfolio – Climate-related transition risk: harmonisation parameters	Delegated Regulation (EU) 2020/1818, Article 6	95
	E1-5	Energy consumption from non-renewable fossil fuels, broken down by source (only sectors with high climate impact) section 38			95
	E1-5	Energy consumption and mix section 37			95
	E1-5	Energy intensity related to activities in sectors with high climate impact sections 40 to 43			95
	E1-6	Gross scope 1, 2 and 3 GHG emissions and total GHG emissions			95
	E1-7	GHG removals and GHG mitigation projects financed by carbon credits			95
	E1-8	Internal carbon pricing system			95

	Disclosure requirement and related data point		Pillar 3 Reference	Reference to the Regulation on benchmarks	Page
NEIS E2, E3, E4, E5					
	ESRS IRO 2 E2, E3, E4, E5	Description of the processes for determining and assessing material incidents, risks and opportunities			112
ESRS S1: Own staff					
Strategy	SBM-2	Interests and opinions of stakeholders			140
	SBM-3	Material incidents, risks and opportunities and their interaction with the strategy and business model			140
Management of impacts, risks and opportunities	S1-1	Policies related to own personnel			140
	S1-2	Processes for collaborating with own workers and worker representatives on impacts			140
	S1-3	Processes for resolving negative incidents and channels for consumers and end users to express their concerns			140
	S1-4	Adoption of measures related to material impacts on own personnel, approaches to mitigate material risks and take advantage of material opportunities related to own personnel and effectiveness of such actions			140

	Disclosure requirement and related data point		Pillar 3 Reference	Reference to the Regulation on benchmarks	Page
Management of impacts, risks and opportunities	S1-5	Goals related to managing material negative impacts, promoting positive impacts and managing material risks and opportunities			140
	S1-6	Characteristics of the company's employees			140
	S1-8	Coverage of collective bargaining and social dialogue			140
	S1-9	Diversity parameters			140
	S1-10				140
	S1-11				140
	S1-12	People with disabilities			140
	S1-13	Training and capacity development parameters			140
	S1-14	Health and Safety			140
	S1-15	Work-life balance			140
	S1-16	Remuneration parameters (pay gap and total remuneration)			140
	S1-17	Serious human rights incidents, complaints and impacts			140
ESRS S2: Value chain workers					
	S2				158
ESRS S4: Consumers and end-users					
Strategy	SBM-2	Interests and opinions of stakeholders			158
	SBM-3	Material incidents, risks and opportunities and their interaction with the strategy and business model			158

	Disclosure requirement and related data point		Pillar 3 Reference	Reference to the Regulation on benchmarks	Page
Strategy	S4-1	Policies related to consumers and end users			160
	S4-2	Processes for engaging with consumers and end users on impacts			160
	S4-3	Processes for resolving negative incidents and channels for consumers and end users to express their concerns			160
	S4-4	Adoption of measures related to material impacts on consumers and end-users, approaches to mitigate material risks and take advantage of material opportunities related to consumers and end-users and the effectiveness of such actions			160
	S4-5	Goals related to managing material negative impacts, promoting positive impacts and managing material risks and opportunities			160
ESRS G1: Business Conduct					
Governance	GOV-1	The role of the administrative, management and supervisory bodies			70
Management of impacts, risks and opportunities	IRO-1	Description of the processes for determining and assessing material incidents, risks and opportunities			70
	G1-1	Corporate culture and corporate culture and business conduct policies			70
	G1-2				70
	G1-3	Prevention and detection of corruption and bribery			70
Parameters and goals	G1-4	Confirmed cases of corruption or bribery			70
	G1-6				70

Annex 4. Disclosure requirements established in the ESRS covered by the Sustainability Report

Chapter	Standard	Disclosure Requirement	Page
GENERAL INFORMATION			
Basis for preparation	ESRS 2	BP-1, BP2	68
Governance	ESRS 2	GOV-1, GOV-2, GOV-3, GOV-4, GOV-5	70
Strategy	ESRS 2	SBM-1, SBM-2, SBM-3	75
Management of Impact, Risks, and Opportunities	ESRS 2	IRO-1, IRO-2, MDR	79
ENVIRONMENTAL INFORMATION			
Climate Change			
Strategy	E1	SBM-3, E1-1	95
Impact, Risk, and Opportunity Management	E1	IRO-1, E1-2, E1-3	95
Parameters and Targets	E1	E1-4, E1-5, E1-6, E1-7, E1-8	95
Pollution	E-2		
Impact, Risk, and Opportunity Management	E-2	IRO -1 E2-1 E2-2	112
Parameters and Targets	E-2	E2-3 E2-4 E2-5	112
Water	E-3		
Impact, Risk, and Opportunity Management	E-3	IRO-1 E3-1 E3-2	117
Parameters and Targets	E-3	E3-3 E3-4	117
Biodiversity	E-4	MDR-A	121
Circular Economy	E-5		
Impact, Risk, and Opportunity Management	E-5	IRO-1 E5-1 E5-2	123
Parameters and Targets	E-5	E5-3 E5-4 E5-5	123

Chapter	Standard	Disclosure Requirement	Page
SOCIAL INFORMATION			
Own Workforce			
Strategy	S1	SBM-3	140
Impact, Risk, and Opportunity Management	S1	S1-1, S1-2, S1-3, S1-4	140
Parameters and Targets	S1	S1-5, S1-6, S1-8, S1-9, S1-10, S1-11, S1-12, S1-13, S1-14, S1-15, S1-16, S1-17	140
Workers in the Value Chain			
Strategy	S2		
Impact, Risk, and Opportunity Management	S2	S2-1, S2-2, S2-3, S2-4	158
Parameters and Targets	S2	S2-5	158
End Consumers and Users			
Strategy	S4	SBM-3	160
Impact, Risk, and Opportunity Management	S4	S4-1, S4-2, S4-3, S4-4	160
Parameters and Targets	S4	S4-5	160
GOVERNANCE INFORMATION			
Business Conduct			
Impact, Risk, and Opportunity Management	G1	IRO-1, G1-1, G1-2, G1-3	87
Parameters and Targets	G1	G1-4, G1-5, G1-6, MDR	87

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