# SUSTAINABILITY STATEMENT

# General information

This combined non-financial group statement (hereinafter also referred to as "sustainability statement") has been prepared to meet the requirements of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 (Corporate Sustainability Reporting Directive, CSRD) and article 8 of Regulation (EU) 2020/852 (hereinafter "EU Taxonomy" or "EU Taxonomy Regulation") and to meet the requirements of sections 315b and 315c of the German Commercial Code (HGB) for a non-financial group statement and sections 289b to 289e HGB for a non-financial statement of Südzucker AG.

The following contents represent the combined non-financial group statement for the 2024/25 financial year for Südzucker AG and Südzucker Group. The non-financial group statement was prepared pursuant to section 289d HGB with reference to the European Sustainability Reporting Standards (ESRS) as a framework. Since all of the aspects described apply equally to Südzucker AG and the group, no separate framework within the meaning of § 289d HGB was adopted for the parent company.

Our sustainability statement includes material information on aspects relating to environmental issues, employee issues, social issues, bribery and corruption control and respect for human rights.

HGB aspects	ESRS topic
	ESRS E1 – Climate change ESRS F3 – Water and marine resources
Environmental issues	ESRS E5 — Resource use and circular economy
	ESRS S1 – Own Workforce
Employee issues	ESRS S2 — Workers in the value chain
Social issues	ESRS S4 — Consumers and end-users
	ESRS S1 – Own Workforce
Human rights	ESRS S2 — Workers in the value chain
Bribery and corruption	
control	ESRS G1 – Business conduct

TABLE 028

As part of the annual audit of the group financial statements, KPMG AG Wirtschaftsprüfungsgesellschaft (KPMG), Mannheim, Germany verified that the combined non-financial statement was presented in accordance with section 317, paragraph 2, sentence 4 of the HGB. In addition, the supervisory board commissioned KPMG to perform a limited assurance review of the combined non-financial statement in accordance with ISAE 3000 (Revised).

External references or links are not part of the sustainability statement. These are marked by "\*".

# ESRS 2 – General disclosures

## **Basis for preparation**

# BP-1 – General basis for preparation of sustainability statements

Südzucker Group's sustainability statement has been prepared on a consolidated basis. The sustainability information presented in this report applies to all fully consolidated Südzucker Group companies according to the consolidated financial statements of Südzucker AG. This also includes AGRANA Beteiligungs-AG and its subsidiaries (hereinafter AGRANA). Immaterial subsidiaries for the financial report are also immaterial for the sustainability statement. Südzucker AG has not identified any joint ventures, associated companies or non-consolidated subsidiaries over which the company exercises operational control. Therefore, the information on Scope 1 and 2 greenhouse gas (GHG) emissions in the "Climate Change" section relates exclusively to fully consolidated companies.

The sustainability statement also takes into account the upstream and downstream value chains of Südzucker Group. This covers both the materiality assessment process and the policies, actions and targets described, where material impacts, risks or opportunities have been identified in relation to the upstream and downstream value chain (e.g. Scope 3 GHG emissions). We do not provide any comparative figures for the first year of preparing the sustainability statement.

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The forward-looking statements contained in this sustainability statement are estimates of the executive board, which were made to the best of its knowledge and belief at the time of preparing the annual financial statements. These statements are naturally subject to certain risks and uncertainties. If any of the aforementioned uncertainties or other uncertainties occur, or if the assumptions underlying the statements prove to be inaccurate, the actual outcomes may differ from these forecasts.

### BP-2 – Disclosures in relation to specific circumstances

Südzucker Group uses the same time horizons for sustainability reporting defined by ESRS 1 section 6.4. The defined time horizons are short-term (1 year), medium-term (1-5 years) and long-term (over 5 years).

Value chain metrics, estimated for fiscal year 2024/25, are included in chapters E1 "Climate Change" (GHG emissions Scope 3) and E5 "Resource use and circular economy" (packaging materials). Metrics with a high level of measurement uncertainty can be found in  $\rightarrow$  chapter S1 "Own workforce" (S1-16 compensation metrics). Additional information is available in the indicated chapters.

The measurement of the metrics presented in this report has not been validated by any external body other than the one responsible for quality assurance, unless otherwise stated.

In the following sections, references to sustainability or material sustainability topics relate in particular to the material impacts, risks and opportunities that we identified in the materiality assessment.

Südzucker Group' sustainability statement does not contain any references to other parts of the management report.

#### Governance

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

### Supervisory board and executive board

Südzucker AG is a German stock corporation and, as such, has a dual management structure consisting of an executive board and supervisory board. Pursuant to article 77 of the German Stock Corporation Act, the Südzucker AG executive board — currently consisting of four members — is responsible for managing the company. The supervisory board consists of 20 members in accordance with article 7, paragraph 1 of Südzucker AG's articles of incorporation. According to article 111 of the German Stock Corporation Act (AktG), the supervisory board monitors the management of the company. Transferring management actions to the supervisory board is not permitted under stock corporation law and does not take place.

The Codetermination Act applies to Südzucker AG. Accordingly, the supervisory board is composed of ten shareholder representatives, who are elected by the annual general meeting, and ten employee representatives, who are elected by the employees. No employee representatives are part of the executive board.

The supervisory board aims to select a supervisory and executive board composition that ensures the supervisory board and the executive board are fully able to discharge their duties. The supervisory board primarily focuses on candidates' personal suitability, their professional skills and experience, their integrity and independence, as well as their motivation and capabilities. The supervisory board has adopted its own diversity policy and competence profile, which is in force in the version dated 23 February 2023. Simultaneously, it approved a diversity policy for the executive board's composition, which is valid as per the version from 23 February 2022. The supervisory board is also mindful of aspects such as different educational and professional backgrounds, internationality, gender and age when appointing new executive board members and making proposals for new supervisory board members.

According to the supervisory board, the current composition of the supervisory board aligns with the objectives of the diversity concept and the competence profile. The supervisory board has seven female members, four from the employee side and three from the shareholder side. The proportion of women on the supervisory board is 35%. The legal gender quota as per article 96 section 2 of the German Stock Corporation Act has been met. There is a representation of various educational and professional backgrounds, as well as an international presence on the supervisory board. The CVs of the supervisory board members are available on the company website.

The current proportion of women on the executive board is 0 %, hence, the legal gender quota pursuant to article 76, section 3a, sentence 1 of the German Stock Corporation Act (AktG) is not met. The executive board members' CVs with information on age, educational and professional background and international experience are published on the company website.

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The board has two independent members, which is in compliance with requirements (10% share) considering the ownership structure. Susanne Kunschert, Stuttgart, Germany, and Julia Merkel, Wiesbaden, Germany, are independent of Südzucker AG, its executive board and the controlling shareholder Süddeutsche Zuckerrübenverwertungs-Genossenschaft eG (SZVG).

The supervisory board regularly assesses how effectively it and its committees fulfill their duties. This is done annually using a questionnaire, without external assistance. Each year, the questionnaire is regularly revised and amended according to the latest revision of the German Corporate Governance Code. The questionnaires are evaluated, and the results and improvement suggestions are discussed at each November meeting. The aim is to continuously improve the work of the supervisory board and its committees.

The material impacts, risks and opportunities of Südzucker Group can be assigned to the functional competencies based on the sustainability-related qualification matrix. The material impacts, risks and opportunities of the environmental topics are aggregated for the functional competence of "ecological sustainability". The material impacts, risks and opportunities of the social aspects or personnel topics are represented in the functional competence of "Human resources/social sustainability". The material impacts, risks and opportunities related to the topics in the area of business conduct are reflected in the functional competence of "responsible business conduct and strategy/compliance" and in the sectoral competencies of "Food production/distribution and related value chains" as well as "agriculture and raw materials". The committee for strategy and sustainability, as part of the supervisory board, specifically addresses topics related to sustainability.

# Sustainability-related qualification matrix for the supervisory

#### Expertise in the area of sustainability Environmental sustainability •• Personnel/Social Sustainability ••• Responsible corporate governance and strategy/Compliance Sustainability reporting and auditing/Control and risk management systems ••• Expertise in the areas of sectors, products and locations Food production / distribution and related value chains •• Agriculture and raw materials •• International business/foreign markets of the Südzucker •• Other business sectors outside Südzucker's core business •• At least one member has special expertise in the respective area. •• At least 25 % of the members have special expertise in the respective area.

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The sectors indicated in the sustainability-related qualification matrix represent our products, manufactured in the relevant regions according to our business model. The supervisory board is regularly informed about the product-specific segments and the locations relevant to the company.

••• At least 50 % of the members have special expertise in the respective area.

Expertise in sustainability related to ecological and social aspects, personnel matters and business conduct is also present on the executive board. The scope encompasses compliance, control and risk management systems, including the material sub-topics in business conduct. Due to their professional backgrounds and many years of experience in the food industry, all members of the executive board have proven industry experience. Thus, the executive board members have adequate knowledge of the sector in which Südzucker AG operates and the company's products. The executive board members also have insights into the circumstances

at individual geographic locations of Südzucker Group thanks to their broad international experience. Responsibilities for Südzucker Group's product-specific segments (sugar, special products, CropEnergies, starch and fruit) and overarching corporate functions are assigned to the executive board members based on their professional background and expertise.

To provide the executive board and supervisory board members with sustainability-related expertise, pertinent training takes place at least once every fiscal year. In fiscal 2024/25, two training sessions on sustainability reporting were conducted. In any case, members of the supervisory board are solely responsible for education and training measures they may require go fulfill their duties. They are appropriately supported by Südzucker AG when necessary. Both the executive board and the supervisory board can also rely on the expertise of the company's specialist departments.

#### Sustainability management organization

The organizational structure of Südzucker Group is designed to aim at a holistic and consistent management of sustainability across the entire group. The overall responsibility for sustainability, and thus for the material impacts, risks and opportunities, lies with the executive board. In accordance with the schedule of responsibilities of the executive board, the sustainability portfolio was assigned to the Chief Operating Officer (COO). He ensures that sustainability, including climate-related issues, is adequately considered in strategic corporate decisions. The executive board approves Südzucker Group's sustainability-related targets and decides on necessary investments in this sector, taking into account potential supervisory board approval rights.

Since June 2022, the group sustainability board has been responsible on behalf of the executive board for advancing and implementing the group-wide sustainability strategy. This steering and decision-making body is responsible for setting priorities,

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submitting proposals for sustainability targets to the executive board, providing an overview of the most important sustainability-related group projects, and monitoring progress in the group-wide sustainability program. It is composed of the members of the divisional managements responsible for sustainability and the heads of selected corporate functions. Other internal and external guests may be consulted depending on the topic It is chaired by the COO. The group sustainability board usually convenes every two to three months. In addition, three further meetings were held at short notice in fiscal 2024/25. The role and operating principles of the group sustainability board are specified in the group sustainability board charter of 2022.

Founded in 2022, the corporate function sustainability is accountable for managing the group-wide sustainability program, including sustainability targets and sustainability reporting. The corporate function sustainability also helps Südzucker Group's departments and operating units integrate sustainability into their business processes and directives. Specifically, this involves developing the necessary processes, tools and training to embed overarching sustainability matters in Südzucker Group. The head of the corporate function sustainability reports to the COO and is part of the group sustainability board.

At the divisional level, sustainability managers are responsible for implementing the corporate strategic direction and for coordinating sustainability activities at the operational and divisional levels. The corporate function sustainability and the divisional sustainability managers form the group sustainability team, whose purpose is to establish a forum for cooperation, knowledge exchange and reaching consensus. The team convenes monthly and as needed.

The content design of the eight impact areas of the group-wide sustainability program is carried out by cross-divisional teams established for this purpose. To link strategic considerations with reporting requirements, the heads of these teams were appointed as so-called standard leads. In this role, their task is to have the required data collected and reported in a complete and standardized manner within the group.

The Corporate Human Rights Committee was set up in 2022 to coordinate issues relating to human rights due diligence within Südzucker Group.

The supervisory board is responsible for monitoring sustainability matters. The supervisory board as the supreme governance body, supervises and advises the executive board in managing the company. This includes all matters that are significant for the strategic direction and leadership of Südzucker Group in line with the principles of sustainability. The supervisory board bases its decision on the results of the consultations and the recommendations of the strategy and sustainability committee. Furthermore, the audit committee has been entrusted with monitoring compliance, including adherence to the requirements to be observed by the executive board concerning environmental

### Sustainability management organization



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ADDITIONAL INFORMATION

### Definition and monitoring of sustainability targets

To advance the integration of sustainability within the group, we have established a dedicated organizational structure (sustainability management organization). New processes were established in this context, including the process for setting group-wide sustainability targets.

The proposals for group-wide metrics and targets to measure our progress in terms of sustainability are prepared by cross-divisional expert teams applying a standardized framework as part of the group-wide sustainability program. The framework includes specifications for defining metrics, targets and actions. The metrics are approved by the group sustainability board. Proposals for sustainability objectives are also discussed before being presented to the executive board for final approval in the subsequent step. The group sustainability board supervises the progress of the group-wide sustainability program. Within the scope of the board resolution, time horizons are also set. Once the time horizons are reached, validation of achieving the targets takes place. A reassessment of the sustainability targets is carried out in advance if necessary.

The controls and procedures in the sustainability area are based on the standard controls and procedures within the group and are continuously developed further (see risk management and internal controls of sustainability reporting). In accordance with the German Stock Corporation Act, the supervisory board also monitors the executive board with regard to sustainability matters, including the setting of sustainability targets and the progress made towards achieving them.

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

The executive board's reporting to the supervisory board is governed by the rules of procedure for the supervisory board and the rules of procedure for the executive board of Südzucker AG. The executive board keeps the supervisory board informed of the group's situation, both at regular meetings and in between. The reporting includes material sustainability matters. In fiscal year 2024/25, sustainability matters were discussed at every supervisory board meeting. Some of the topics addressed by the supervisory board included the status of the CSRD implementation, bio-based chemicals projects, investments to reduce GHG emissions and occupational safety in the group.

The head of the corporate function sustainability and the executive board report on the implementation of due diligence in this area at the annual meeting of the committee of strategy and sustainability. Material sustainability issues are regularly addressed by the COO at executive board level. The head of the corporate function sustainability is asked to present if required. A written report on

the status of selected sustainability projects and current developments in the implementation of due diligence is usually also submitted to the group executive board on a quarterly basis. At the meetings of the group sustainability board, the head of the corporate function sustainability and the heads of the impact area teams regularly report on sustainability matters, especially on the status of actions, metrics and targets for the respective impact area.

The investment process is a good example of how the executive board and supervisory board incorporate sustainability into their oversight of the Group's strategy and decision-making. Investment projects are evaluated using a transparent evaluation matrix. that also includes sustainability-related metrics such as  $CO_2$  emissions and taxonomy-aligned capital expenditures. The weighting of these metrics varies by investment category, with the "sustainability" category being the most significant. Other metrics considered relate to profitability, strategic orientation, and risk areas. This allows projects that contribute to achieving the sustainability targets of Südzucker Group, such as actions taken to reduce GHG emissions, to be specifically requested and approved in the "sustainability" category.

In the course of preparing the sustainability statement, the executive board addressed all material impacts, risks and opportunities. The supervisory board's strategy and sustainability committee also discussed all material impacts, risks and opportunities when the results of the materiality assessment were presented pursuant to ESRS 1.



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# GOV-3 – Integration of sustainability-related performance in incentive schemes

Since the 2021/22 financial year, selected sustainability-related components have been part of the executive board's compensation system. One of the remuneration components for the executive board is the multi-year variable compensation. This accounts for 55 % of the variable compensation or 27.5 % of the total compensation and depends on the achievement of the pre-defined strategic objectives. Part of these strategic objectives is related to sustainability. The outcome is multiplied by a so-called modifier ranging from 0.8 to 1.2. The supervisory board determines the modifier, which is based on the achievement of strategic targets. Südzucker AG's strategic objectives are aligned both with economic and strategic performance, such as the development of new business fields, and with sustainability criteria. The share of variable compensation linked to sustainability-related objectives is not ascertainable because of its mixing with strategic objectives. The executive board's performance for the period 2024/25 to 2026/27 is specifically assessed on the basis of the target to reduce Scope 1 and 2 CO<sub>2</sub> emissions by 2030 (corresponds to the emissions reduction target in the  $\rightarrow$  "Climate Change" chapter), the target to lower the accident rate (by an average of 10 % annually) and other qualitative targets, including in the areas of personnel and human rights. The metrics used to measure the performance of the executive board include the Scope 1 and Scope 2 emissions and Südzucker Group's accident rate. The supervisory board decides on the remuneration system and proposes it to the annual general meeting for approval.

#### GOV-4 – Statement on due diligence

The following table provides an overview explaining where the core elements of the due diligence process according to the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises can be found in this sustainability statement.

### Core elements of due diligence

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-1, GOV-2, GOV-5, SBM-1, S2
b) Engagement with affected stakeholders in all key steps of the due diligence	ESRS 2 SBM-2
c) Identification and assessment of adverse impacts	ESRS 2 IRO-1, SBM-3
d) Taking actions to address these adverse impacts	E1, E3, E5, S1, S2, S4, G1
e) Tracking the effectiveness of these efforts and communication	ESRS 2, E1, E3, E5, S1, S2, S4, G1

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# GOV-5 – Risk management and internal controls over sustainability reporting

Sustainability reporting is embedded in the group-wide risk management system. This fundamentally includes processes and systems for collecting and processing sustainability-related data, which we are continuously improving in terms of maturity. Key components include sustainability reporting principles, procedures and controls. Pursuant to Südzucker Group's risk management directive, the management of the corporate function sustainability, as a risk owner, is also responsible for the identification and assessment of opportunities and risks, the implementation of actions to reduce and manage risks, and the introduction and review of internal controls related to the sustainability reporting process.

In the fiscal year 2022/23, we identified, assessed, and categorized risks in this area into four groups based on the experience of previous sustainability reporting: Functional reporting logic, IT systems, calculation of metrics as well as reporting responsibilities and lines. Identified risks include, among others, unintentional manual calculation errors, faulty transfer of metrics into reporting, and incomplete disclosure. The risks were not prioritized. Based on this foundation, preventive measures for selected aspects of the process were defined and gradually implemented. In fiscal 2025/26, we will delve deeper into this analysis to systematically assess and prioritize further risks related to sustainability reporting.

We have defined minimum requirements for internal controls over sustainability reporting for this purpose. A special focus is placed on the control points close to the data source to enhance data quality (e.g., in the form of the four-eyes principle and plausibility checks). Controls carried out must be documented. In fiscal year 2024/25, new IT tools were implemented in the fields of HR and environment. Their implementation was accompanied by appropriate training sessions. Furthermore, training sessions were held concerning the functional logic of sustainability reporting.

The standard leads are accountable for the existence of and adherence to the minimum controls within the scope of sustainability reporting in their respective areas of responsibility. They take measures to enable the collection, consolidation and validation of the necessary qualitative and quantitative data in accordance with the definitions pursuant to the ESRS in a complete and uniform manner within the group. The corporate function sustainability is responsible for the overall process. The currently valid reporting responsibilities and reporting lines were approved by the executive board in July 2023.

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Efforts to implement internal controls for the sustainability reporting process are ongoing. The next step for the group is to establish an internal control system to assess the effectiveness of these controls and report the findings to the executive board and supervisory board accordingly.

## Strategy

### SBM-1 – Strategy, business model and value chain

Südzucker's business model involves the use of plants and other raw materials of agricultural origin to develop, produce and market premium-quality food, food ingredients, animal feed, ethanol and other products.

The diagram "Südzucker Group value chain" illustrates the value chain of Südzucker Group across the individual segments. In a predominantly European and regionally based production process, we procure more than 30 million tonnes of renewable agricultural raw materials such as sugar beet, grain, chicory and fruit each year. We ensure the supply of raw materials by means of contract farming in the cultivation of sugar beet, chicory, field beans, potatoes and, to some extent, fruit. By purchasing our agricultural raw materials directly from farmers, we improve our ability to work with them to enhance sustainability in agriculture. The topics of sustainable and efficient agriculture are also addressed in our own agricultural operations, which simultaneously contribute to the raw material supply for the factories. We are committed to conducting research in these areas and sharing our knowledge with our business partners, in particular farmers and customers.

In fiscal 2024/25, sugar beets make up most of the agricultural raw material volume with 29 million tonnes. In the sugar segment, we collaborate with approximately 27,000 beet growers in Europe as part of a long-term partnership. The beet growers are organized into associations that negotiate and agree on the contract terms with Südzucker. Apart from sourcing via contract farming, we also purchase agricultural raw materials from traders who source directly or indirectly from raw material farmers. Within Südzucker Group, only the Freiberger division procures finished products such as flour, tomato sauce and cheese from retailers.

We aim to completely process and enhance the agricultural raw materials we purchase. We use synergy effects to operate our production plants, especially at the interconnected sites where we operate multiple industrial plants. For example, by-products from the starch facilities are valorized by processing them into ethanol at the ethanol plants. Many of our manufacturing locations are embedded in rural areas, where they foster growth and create jobs. We operate approximately 100 production facilities in total, primarily located in Europe. The fruit segment has a global presence with its sites around the world.

In terms of marketing, we focus on the business-to-business sector. End products for consumers and end-users are exclusively manufactured in the sugar, starch and special products (Freiberger division) segments. We serve clients from the food and beverage sector, the feed and mineral oil industries, and consumer markets like retail and the food service market. We market sugar specialties and glucose syrups, functional ingredients, frozen and chilled pizzas, portion pack articles, ethanol, animal feed, starch, as well as fruit preparations and fruit juice concentrates. In line with specific customer requirements, we offer products in organic quality, for example, as well as Fairtrade, GMO-free, Roundtable on Sustainable Palm Oil (RSPO), Marine Stewardship Council (MSC), kosher and halal certified products. We also support our customers in developing and optimizing their products. This diverse range of products, along with different regional markets, is aimed at balancing risks.

The major products offered by Südzucker Group in terms of revenues are sugar, ethanol, pizza and fruit preparations. In light of the material impacts, functional ingredients and plant-based proteins are also important for contributing to a balanced diet. The majority of sales revenues is attributed to the EU with 68 %. Germany plays a crucial role (23 % of the revenues) in this context.



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Sugar

Segment



Raw sugar

trading



Production

Refineries

- Sugar
- Sugar specialties
- Sugar syrup
- Non-Food & Fermentation

**Products** 

Animal feed

Food industry

Customers

- Retailers
- Agriculture

**Special** products



Procurement of raw materials

Production of

cane sugar



- · Ingredients offering additional benefits for food, feed, non-food and pharmacy
- Convenience food (frozen and chilled pizzas, pasta, baguettes, breadsnacks, sauces, dressings)
- Portion packs (food & non-food)

- Food industry
- Animal feed industry
- Pharmaceutical industry
- Food retailers
- Hotels
- Restaurants
- Catering (food services)

CropEnergies





- Fuel ethanol
- Neutral alcohol
- · Protein-based food and animal feed
- Biogenic CO<sub>2</sub>
- Technical alcohol
- Oil companies and traders
- Food industry
- Animal feed industry
- Beverage industry
- · Cosmedics industry
- Pharmaceutical industry

Direct business relationship

No direct business relationship

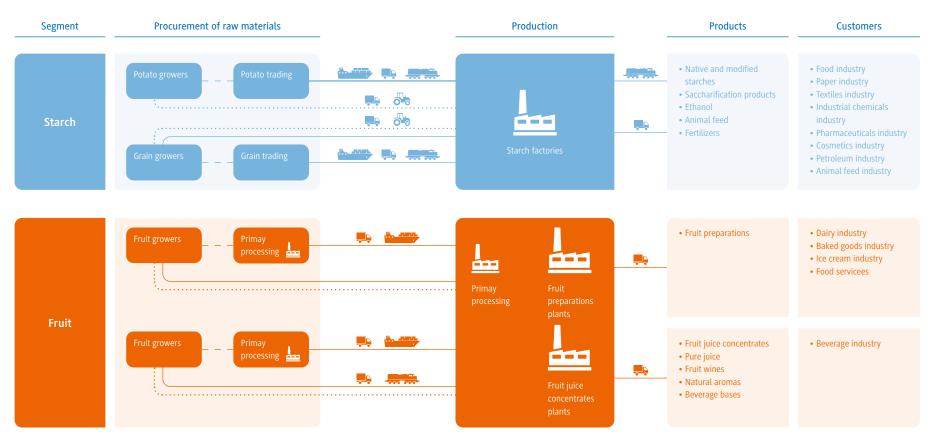
Contract farming

Processing

level(s)

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Direct business relationship

No direct business relationship

Contract farming

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In fiscal year 2024/25, 4,855 people, representing 25 % of the workforce, were employed in Germany. 7,584 employees work in other EU countries and 7,520 are employed abroad (→ ESRS S1 "Own workforce"). In total, Südzucker Group employed 19,959 people by the end of the 2024/25 fiscal year.

### Sustainability strategy

Sustainability is closely linked to our company's purpose — we drive for a livable, healthy and sustainable world with plant-based solutions. This is why the advancement and implementation of our "Growing in Balance" sustainability strategy is one of the four focus topics in the 2026 PLUS group strategy.



Here at Südzucker Group, "Growing in Balance" means harnessing the passion and expertise of all of our employees in their diverse roles to create value that is in harmony with people and the planet. In everything we do, we aim to strike a balance between economic, ecological and social issues, as well as the various expectations of our stakeholders and actively include them in these considerations. Together, we can help create a future worth living in.

Our operating activities give us direct influence on and, therefore a special responsibility for the people around us ("People"), protecting and restoring the environment ("Planet") and highquality, innovative products and services as the basis for our economic success ("Value"). To meet this responsibility, we are working on eight impact areas as part of our group-wide sustainability program, including emissions reduction, responsible water use, circular economy, conscious consumption, attractive workplace, safe operations, responsible sourcing and sustainable farming. We are currently defining group-wide targets and specific measures for achieving them for each of these areas. Our sustainability targets are relevant across all segments and regions within the entire company. We are therefore committed to ensuring that all products and markets contribute to the success of our group-wide sustainability strategy.

The most important sustainability challenges we currently face include, in particular, managing sustainability matters in the upstream value chain, including collecting the necessary data, quantifying sustainability risks, and building knowledge and awareness of the topic in the Group's specialist departments and units.

The key solutions and most important projects, as well as our group-wide measurable sustainability goals, are described in more detail in the respective chapters.



Since commitment from all our employees is key to implementing our sustainability program, we believe it is essential to provide regular communications on sustainability tailored to the specific target audiences. We also conduct training courses and workshops on selected sustainability topics to enhance internal knowledge in this area.

#### SBM-2 - Interests and views of stakeholders

Südzucker Group strives for an open and continuous exchange with various stakeholders, laying the foundation for mutual understanding and social acceptance of our business decisions.



# Stakeholder engagement within Südzucker Group

Stakeholder category	Dialog formats	Purpose of engagement	Main topics in relation to sustainability
Employees and unions	Employee meetings Performance reviews Staff newspapers Newsletters Intranet Training events Town hall meetings Video messages Online meetings Surveys Grievance mechanisms	Continuous improvement of working conditions Protection of the health and safety of employees Promotion of open communication Further development of the corporate strategy	Health and safety Work-life balance Diversity and inclusion Remuneration Working conditions and personal development Group and sustainability strategy
Customers / Consumers	Customer consultation Application support / services Product specifications Certifications Product websites Trade fair presence Surveys Grievance mechanisms	Understanding customer requirements and expectations Adding value to our product offering Further developing products Developing innovative solutions	Products and services Innovations Customer requirements in the area of sustainability Climate and environmental protection in own operations and in agriculture Social affairs and human rights Sustainability assessments and certifications
Shareholders, capital market, financial institutions, investors		Further increase transparency and trust Promote sustainable investment decisions	Climate change and energy transformation Sustainable agriculture Water Human rights Corporate governance
Suppliers, including farmers	Information events (farmer meetings, field days, exhibitions, supplier forums) Online platforms (raw materials portal); Supplier communication (awarding negotiations, farming consultation) Grievance mechanisms	Understanding the needs of farmers and the risks associated with certain crops Promoting sustainable and ethical sourcing practices Creating transparency Ensuring partnership-based, long-term, reliable and resilient supplier relationships	Practices to improve sustainability in agriculture without affecting yields Data collection and measurement of emissions Climate protection Human rights due diligence Training
Press and public (journalists, media, residents and neighbors, authorities, industry and interest groups, research and scientific institutions, politics, schools, universities)	Cooperative research and projects Political dialogue Committee meetings Talks	Promoting trust and acceptance Strengthening local ties	Investments in sustainability projects/sustainability strategy Climate and environmental protection Social commitment Nutrition

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Sustainability statement

We distinguish the following main stakeholder groups with whom we engage on various sustainability matters: Investors and financial institutions, shareholders (SZVG), rating agencies, customers and end consumers, farmers, suppliers (excluding farmers), employees, works council, trade unions, affected communities, society and NGOs, media, politics and authorities as well as industry and interest groups.

They have been divided into five categories: Employees and trade unions, customers, investors and financial institutions, suppliers (including their workforce), as well as society and the public. We have various formats at our disposal for the exchange.

Besides financial ratings, sustainability ratings assessing our company's sustainability performance are essential for capital market participants. We maintain regular contact with selected rating agencies. Südzucker Group has participated in the EcoVadis sustainability evaluation system since 2013. EcoVadis is an initiative that evaluates companies based on their commitment to social responsibility. In the current EcoVadis rating, the Südzucker Group was able to improve further and successfully retain its silver medal.

Südzucker Group is a member of key sustainability-oriented initiatives and organizations (table "key sustainability-oriented initiatives and organizations").

The findings gained from our engagement with stakeholders continuously contribute to the further development of our group strategy. As part of developing the policies for the eight impact areas of our sustainability strategy, a specific analysis of the relevance and positions of the individual stakeholder groups was performed and incorporated into our standardized framework. We also conducted a stakeholder analysis as part of the materiality assessment pursuant to ESRS 1. We are generally aware of the interests and points of view of our most important stakeholders as

### Key sustainability-oriented initiatives and organizations

Organization	Registered office	Member	Since	Objective
Charta der Vielfalt e. V.	Berlin, Germany	Südzucker AG	2008	Promotion of the recognition, appreciation and integration of diversity into Germany's business culture
EcoVadis SAS	Paris, France	Südzucker AG <sup>1</sup>	2013	Supplier assessment considering various aspects of corporate social responsibility
Fairtrade Deutschland / Transfair e. V.	Cologne, Germany	Südzucker AG	2006	Promotion of fair trade
SAI – Sustainable Agriculture Initiative Platform	Geneva, Switzerland	Südzucker AG <sup>1</sup>	2014	Promotion of sustainable agricultural practice
Science Based Targets initiative	New York, USA	Südzucker AG <sup>1</sup>	2022	Define and promote best practices for achieving climate goals
Sedex Information Exchange Limited	London, UK	Südzucker AG <sup>1</sup>	2009	Promotion of good social and environmental practice in the value chain
United Nations Global Compact	New York, USA	Südzucker AG <sup>1</sup>	2022	Promotion of actions to implement the Sustainable Development Goals for a sustainable and inclusive global economy

More than one entity of Südzucker Group endorses this initiative.

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

TABLE 032

The identified material impacts, risks and opportunities reflect Südzucker Group's business model and group strategy, including the sustainability strategy. We are a manufacturer of high-quality products, particularly in the food sector but also in the animal feed and non-food sectors, and as an operator of large-scale technical plants, our material impacts, risks and opportunities are centered on the activities in our production facilities, on our employees and on the workers in the agricultural raw material supply chains.

they relate to our group strategy, our sustainability strategy and our business model. In this way, we aim to strike a balance between the various, occasionally contradictory expectations of our stakeholders and align them with our corporate targets. This forms a core part of our sustainability philosophy, "Growing in Balance". We are not seeking to modify the business model to include the processing of agricultural raw materials.

No significant changes were made to the group's strategy and business model in the 2024/25 fiscal year.

Communication with the executive board, the supervisory board and the group sustainability board regarding our stakeholders' positions and expectations in relation to sustainability takes place as needed.

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A short summary of the material impacts, risks and opportunities can be found in the corresponding tables at the beginning of each thematic chapter. These tables also provide details of the material impacts — specifically, their influence on people and the environment, the expected time horizons for their occurrence and their linkage with the company's own activities or business relationships.

In the respective chapters, we describe how the material impacts, risks and opportunities currently influence and will continue to influence our business model, value chain, strategy and decision-making. This also applies to the information on the link between the material impacts and the strategy and business model.

All material impacts, risks and opportunities of Südzucker Group in accordance with the tables at the beginning of the chapters are covered by the disclosure requirements of the ESRS. No company-specific information was identified as material.

We have not identified any material financial impacts from our material risks and opportunities on our financial position and performance for the 2024/25 fiscal year. Furthermore, we have not identified any material risks or opportunities that could result in a significant risk of a material adjustment to the carrying amounts of assets and liabilities within the next reporting period, which will be reported in our corresponding financial statements.

Based on current assessments, Südzucker Group's business model and group strategy boast resilience to cope with the identified material impacts and risks and to seize material opportunities. We will continuously derive need for action from the significant effects, risks and opportunities identified and implement the required measures to maintain this status.

### Impact, risk and opportunity management

# IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

In 2024, we conducted a double materiality assessment for the first time in accordance with the requirements of ESRS 1. The identification of material impacts, risks and opportunities provides the basis for the direction of our (sustainability) strategy and defines the framework for our group-wide sustainability reporting. We will review the relevance of the findings annually and make adjustments if necessary. We intend to conduct a comprehensive materiality assessment every three years.

As part of the materiality assessment, we considered the extent to which our company impacts people and the environment along with the risks and opportunities that arise for the company from sustainability aspects. Südzucker Group does not prioritize sustainability-related risks compared to other types of risk.

We performed the materiality assessment from a group perspective for all companies included in CSRD. Regarding the impacts, both the upstream and downstream value chains, as well as the company's own operations, were considered. Südzucker Group's business model guided the analysis, with particular emphasis on food production, chemical manufacturing, and energy generation as independent activities, along with the agricultural production of our business partners, the farmers. We documented differences in terms of divisions, which also affected business activities, as well as regional and business relationships.

The materiality assessment process to identify and assess the material impacts, risks and opportunities consisted of five steps, which are outlined in more detail below.

### Step 1: Compilation of potentially relevant sustainability matters

We started by drawing up a list of potentially relevant sustainability matters. This was based on the list of sustainability aspects from ESRS 1 covered in the topic-specific reporting standards. We also drew on other external and internal sources, such as the eight impact areas of our "Growing in Balance" sustainability strategy. All eight impact areas could be assigned to at least one ESRS standard. No company-specific topics were identified beyond the list of sustainability aspects covered by the topic-related reporting standards in ESRS 1.

We also created a guideline summarizing the information relevant for the evaluation.

# Step 2: Identification and evaluation of impacts, risks and opportunities

The identification and evaluation of impacts, risks and opportunities for each sustainability topic involved internal experts from various relevant specialist functions. For this purpose, several workshops were held for each topic and subtopic. Experts were selected based on their expertise and extensive experience in their respective business areas. They gathered additional information from the units as necessary and consulted other internal experts.

Various sources were used to identify and evaluate the impacts, risks and opportunities. With regard to impacts, for example, this was the risk analysis in accordance with the supply chain due diligence law and internal queries at the production locations; with regard to risks and opportunities, it was the current compliance reports, the climate change scenario analysis and the findings of group-wide risk management. The identification of impacts, risks and opportunities for the business conduct topics particularly took into account specific locations, activities and sectors.

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A rating scheme was defined for the subsequent evaluation of impacts, risks and opportunities, implementing the criteria set out in ESRS 1. Topics with actual impacts were evaluated in terms of severity based on extent and scope and, in the case of negative impacts, for irreversibility. Topics with potential impacts were also evaluated in terms of likelihood of occurrence. In the case of extent, scope and irreversibility, the values of the scale from 1 to 3 were supported by a qualitative explanation. With regard to potentially negative human rights impacts, priority was given to severity over likelihood.

To determine the financial materiality of a topic, risks and opportunities were evaluated based on the potential extent of the financial effects in alignment with the risk management process and the respective likelihood of occurrence. The extent was rated on a scale of 1 to 5 and assigned a euro amount; the likelihood was rated on a scale of 1 to 4 and assigned a factor.

The maximum value was calculated for the evaluated impacts, risks and opportunities, divided by three and assigned to a three-level rating scale (low, medium, high). We consider a topic to be material if an impact, risk or opportunity is at least in the "medium" range.

The identified impacts were also analyzed to determine whether they could give rise to risks and opportunities. We also identified the level of the value chain at which each impact occurs or could occur. The evaluation also considered to what extent the impacts, risks and opportunities change within the time horizons. The materiality assessment time horizons pursuant to ESRS 1 exceed the time horizons of risk management. The results of the evaluation, along with the reasons, were documented.

### Step 3: Considering the stakeholder perspective

The internal experts' evaluation was subsequently supplemented by the stakeholders' perspective. As part of the stakeholder analysis, stakeholder groups were identified for each subtopic that are particularly affected by the impacts of Südzucker Group's business activities in the respective area or have a strong interest in the topics as users of sustainability information. In the second step, we usually identified internal representatives for these relevant external stakeholder groups. Direct involvement and consultation of the stakeholders concerned was only partially conducted for the stakeholder groups of the works council, farmers and shareholders.

Interviews were generally conducted in a structured format. The feedback from the representatives of the stakeholder groups was incorporated into the final assessment of the materiality of the individual sustainability matters.

#### Step 4: Review and consolidation of the results

The overall result, including the stakeholder perspective, was submitted to the internal experts for final validation. A summary was also presented and approved by the group sustainability board. A total of 54 impacts, risks and opportunities are material for Südzucker Group.

### Step 5: Validation of results by the executive board

The executive board finally approved the results of the materiality assessment. These were also submitted to the supervisory board and its relevant strategy and sustainability committee.

A list of material impacts, risks, and opportunities can be found at the beginning of the respective chapters on the topic-specific standards.

The material sustainability matters are addressed by the respective group functions and coordinated for the Südzucker Group. This also includes the relevant opportunities and risks, which are mapped in the group-wide risk management system. The operational implementation takes place within the units of the Südzucker Group. The evaluation of impacts is currently not integrated into the group's risk management process.

# Description of the processes to identify and assess material environmental impacts, risks and opportunities

Within the scope of the double materiality assessment, the IRO-1 disclosure requirements of the topic-specific standards "Climate change", "Pollution", "Water and marine resources", "Biodiversity and ecosystems", and "Resource use and circular economy" were duly incorporated. The assessment covered the own operations, the upstream and downstream value chain, and, if applicable, assets, identifying the (material) impacts, risks, and opportunities related to the respective subtopics of the topic-specific standards. No direct consultation with affected communities took place within this framework. The interests and positions of the impacted communities were acknowledged, with internal stakeholder representatives being included in the materiality assessment process.



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### Climate change

The production of our products leads to the release of GHG emissions. As part of the double materiality analysis in the area of "Climate change", the impacts on climate change were determined on the basis of the company's footprint for the year 2023/24 (Scope 1, 2 and 3) along with the current and planned business activities. Materiality was assessed individually for the upstream value chain (Scope 3, categories 1–8), own operations (Scope 1 and 2) and downstream value chain (Scope 3, categories 9–15). Materiality is identified when GHG emissions account for  $\geq$  15 % of the company's footprint. Moreover, in the area of Scope 3 GHG emissions, one category was rated as significant at > 5 %. In addition, regulatory and market issues, as well as climate risks, were analyzed in terms of their risks and opportunities.

Our climate change scenario analysis for both production sites and agricultural supply chains follow the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).

In fiscal 2022/23 we conducted a climate change scenario analysis for nearly 100 production locations in Südzucker Group. The aim of the survey was to determine the climate risk for each location. The scenarios recommended by the Intergovernmental Panel on Climate Change (IPCC) were applied, consisting of a combination of the Shared Socioeconomic Pathways (SSPs) and the Representative Concentration Pathways (RCPs). These climate scenarios are used in the Sixth Assessment Report of the IPCC and thus reflect the current state of scientific knowledge. The current conditions were considered along with an optimistic scenario (SSP1-2.6) and a pessimistic scenario (SSP5-8.5) up to 2040 and 2060 (long-term). Neither short-term (up to one year) nor medium-term (> 1–5 years) time horizons were considered. In selecting the time horizons, we aim to ensure that the lifetime of the analyzed assets is largely covered; there is no link to the strategic planning horizon (currently until 2026 or 2030) and the capital allocation plans. These scenarios do not apply to

climate-related assumptions in the financial statements. We believe that the scenarios chosen cover the range of plausible risks and uncertainties, and that they can be used to assess the different conditions our sites might encounter.

The SSP1-2.6 scenario, which aims for sustainable development, envisions governments engaging in international cooperation and implementing strict environmental regulations. It promotes renewable energies and sustainable technologies, leading to stable economic growth and reduced inequality. The SSP5-8.5 scenario, by contrast, assumes a development that is heavily dependent on fossil fuels. Here, the emphasis is on economic growth, often at the expense of the environment. This results in high growth rates, but also in greater inequality and social tensions. As a company operating in the global food industry, political, economic, energy-related and technological conditions are crucial to Südzucker Group. These dynamics are accounted for in both scenarios.

The climatic hazards were selected based on an assessment by external experts, taking into account the geographical coordinates of the sites. The hazards classified as acutely relevant for Südzucker Group are heat waves, tornadoes/storms, forest and wildfires, droughts and flooding. The hazards classified as chronically relevant are water-stressed areas and rising sea levels. The data used for this analysis was gathered from a variety of sources, including the IPCC's interactive atlas, the World Resources Institute's Aqueduct Floods Tool, the Global Risk Data Platform of the United Nations Environment Programme (UNEP), and the internal knowledge and data of Südzucker Group. Furthermore, the identification and assessment of physical risks included the criteria of probability and extent to classify them from "low" to "high". This classification did not factor in the duration. Climate models with a spatial resolution of 100x100 km were used. Spatial resolution presents a limiting factor, as specific considerations of individual production sites are not possible. Moreover, climate scenarios cannot, in principle, fully represent all the details and complex interactions of climate systems. There are further limitations due to the inclusion of socio-economic factors that are based on assumptions and do not accurately reflect reality.

Standardized questionnaires were used to assess the exposure of production locations and the potential impact on production processes – triggered by the various hazards. The potential physical climate risk of a location was assessed based on this information. Consequently, the vast majority of our production locations are in the medium-risk category. The climate-related hazards assessed as posing a higher risk include drought and/or heat waves, as well as water stress. After a detailed analysis in fiscal 2024/25 for the production locations that were initially classified as high risk, only two locations ultimately retained a high classification. The next step is to examine adaptation measures on this basis.

Alongside the climate change scenario analysis for our own production locations, we started analyzing climate risks across our agricultural value chains in the 2023/24 financial year. For this purpose, a specific risk model was developed for Südzucker Group to enable the systematic identification of climate risks. In the first step, the physical climate risk for sugar beet was determined based on selected indicators, and preliminary potential impacts on yields were examined. In addition, we also evaluated options for increasing resilience, which can be classified into three areas: Actions at group level, actions at processing location level and actions at farm level. For example, the use of new varieties, precision farming methods and improvements in crop protection were examined.

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A second step was taken in fiscal 2024/25, when the analysis was continued for sugar beets, following the approach developed in the previous year, and expanded to include wheat and corn as additional agricultural raw materials relevant to Südzucker Group, in order to enhance the significance of the results. In line with the analysis of the company's own operations, the combined SSP and RCP scenarios were employed in the analysis of the upstream value chain. The current conditions were considered, along with an optimistic scenario (SSP1-2.6), a medium scenario (SSP2-4.5) and a pessimistic scenario (SSP5-8.5) up to 2030 (medium-term), as well as up to 2040 and 2060 (long-term). A short-term time horizon (up to one year) was not considered. When selecting the time horizons, we aim to cover the lifetime of our assets as comprehensively as possible. There is a link to the strategic planning horizon, but not to the capital allocation plans. We believe that the scenarios chosen cover the range of plausible risks and uncertainties, and that they can be used to assess the different conditions our supply chains might encounter.

A description of the main dynamics included in the SSP1-2.6 and SSP5-8.5 scenarios is provided in the "own operations" section. The SSP2-4.5 scenario, also known as the "middle of the road" scenario, assumes a development in which social, economic and technological trends do not shift markedly from historical patterns.  $CO_2$  emissions remain stable until about 2050 and then begin to decline, but do not reach net zero by 2100. Income growth is uneven, and progress toward the sustainable development goals is slow. Environmental challenges remain, despite some progress being made.

The selection of climate risks considered in the climate change scenario analysis was based on the assessment of internal and external experts, with regard to the geographical coordinates of the locations. During the fiscal year 2023/24, the initial step took into account the climate indicator temperature (days exceeding 30°C), encompassing both heat stress (chronic) and heat waves (acute), along with the precipitation indicator (alteration in precipitation levels). In fiscal 2024/25, further crop-specific climate-based indicators for sugar beet, wheat and corn were developed in a second step with internal and external experts. Both temperature-related and precipitation-related indicators were included. Other climate-related hazards and indicators from the classification table of climate hazards according to ESRS E1 were also analyzed for their relevance and included if appropriate. The identification and evaluation of physical risks included the criteria of probability, extent and duration.

To analyze climate-related physical risks within the upstream value chain, climate models were used at the level of defined cultivation regions (resolution of 100x100 km). The climate scenario restrictions are similar to those for our own operations, except that the focus is on the agricultural fields instead of the production locations as mentioned previously.

Südzucker Group is an energy-intensive industrial refiner, particularly in the sugar, CropEnergies and starch segments, and the majority of its production locations in these segments are subject to EU emissions trading. The company is thus also intensively focused on transitional climate risks associated with the transition to a low-carbon economy in line with the 1.5-degree limit.

No climate change scenario analysis has yet been used for the identification and assessment of transition risks. We plan to take this step in fiscal year 2025/26. We identified the transition risks in our own operations and within the upstream and downstream value chain, based on the 1.5-degree scenario for limiting global warming (excluding other scenarios) and with due consideration of short, medium and long-term transition events (e.g. higher pricing of GHG emissions, costs of transitioning to lower-emission technologies, increased raw material costs) and assessed these risks in terms of extent, likelihood and duration.

We have not identified any assets and business activities that are inconsistent with the transition to a carbon-neutral economy or require significant efforts to be compliant with this transition.



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#### **Pollution**

The analysis was performed following the LEAP approach<sup>1</sup>. Workshops were held with internal company experts to assess the dependencies and effects. We were able to exclude the sub-topics "substances of concern" and "microplastics" as they are not material to our business model. With regard to the sub-topics of air, water, and soil pollution, we relied on environmental regulations and, where necessary, conducted surveys at production sites. The cultivation of agricultural raw materials was especially emphasized, given that this field has the strongest ties to nature. Risks (particularly transition and physical risks) and opportunities were then assessed with the help of risk management.

All impacts, risks and opportunities identified related to pollution were classified as immaterial. Südzucker Group operates no locations where pollution is of material significance and has no business activities associated with material impacts, risks and opportunities related to pollution. Considering this context, the ESRS E2 standard is not disclosed. This assessment is partly based on the regulatory requirements that Südzucker Group and its value chain must adhere to, particularly in Europe, where a large part of the company's business activities are located. Furthermore, there are no findings on actual negative impacts in terms of pollution.

When identifying the impacts, risks, and opportunities related to water and marine resources, a list of potentially relevant sites was compiled and water risk was considered in particular, using tools such as the Aqueduct Water Risk Atlas. The sites located at river basins were also taken into account. Water plays a vital role, especially for the activities within the sugar segment situated in Europe. Due to the business model, there is no reliance on marine resources. The divisions associated with material impacts, risks, and opportunities related to water and marine resources are listed in the table at the beginning of the "Water and marine resources" section.

The analysis was performed following the LEAP approach. Workshops were held with internal company experts to assess the dependencies and effects. We relied on environmental regulations and, where necessary, performed inquiries at production site level. The consumption of surface water and groundwater as well as withdrawals and discharges were also considered. Marine resources, including their extraction and utilization and the associated economic activities, were covered as well. Only the Freiberger division is affected here to a minor extent. Risks and opportunities were then assessed with the help of risk management.

#### **Biodiversity and ecosystems**

Activities related to agriculture were specifically considered in the analysis, because in this area the interfaces with biodiversity and ecosystems are particularly pronounced.

The analysis was performed following the LEAP approach and potentially relevant sites of Südzucker Group were identified. Workshops were held with internal company experts to assess the dependencies, such as those on biodiversity and ecosystems, and impacts. We relied on environmental regulations and, where necessary, performed inquiries at production site level. The

findings and experiences gained from Südzucker Group's commitment to the Sustainable Agriculture Initiative Platform (SAI) supported the process.

In the following step, transition risks, physical risks, systemic risks, and opportunities were assessed with the help of risk management. A scenario analysis was not applied for the identification of risks and opportunities.

We have not identified any significant impacts, risks, and opportunities related to biodiversity and ecosystems. With the exception of the fruit segment, Südzucker Group primarily sources agricultural raw materials from the European Union. This ensures the company complies with the "conditionality" applicable to agricultural production in the EU in the areas of climate and environment, including water, soil, biodiversity and landscape, public health, plant health and animal welfare. Compliance with "conditionality" is a fundamental requirement for receiving direct payments and other benefits under the EU's common agricultural policy. Farmers face administrative sanctions for non-compliance.

Activities related to our locations in or near areas with vulnerable biodiversity do not negatively impact these areas. No remedial actions regarding biodiversity need to be taken.

Potential negative impacts on biodiversity and ecosystems have been identified in the AGRANA subgroup's fruit sector. These impacts are limited to the fruit sector and is thus not material for Südzucker Group as a whole.

When identifying the impacts

<sup>&</sup>lt;sup>1</sup> The LEAP approach is an integrated approach for identifying and assessing nature-related issues, developed by the Taskforce on Nature-related Financial Disclosures. LEAP refers to Locate, Evaluate, Assess and Prepare. These four phases aim to assist organizations in evaluating their dependencies and effects on the environment, identifying nature-related risks and opportunities, and taking action accordingly.

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### Resource use and circular economy

The analysis was performed following the LEAP approach. Resource inflows, resource outflows and waste were examined in detail for their material impact. As part of the materiality assessment, the business segments associated with material impacts, risks and opportunities relating to the use of resources and the circular economy were identified. The material resources used, the material opportunities linked to the circular economy and the stages of the value chain on which resource use and risks are centered were also included.

# IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The relevant information for the sustainability aspects assessed as material was disclosed for the 2024/25 financial year in accordance with the disclosure requirements (full use of the phasing-in regulations). Data points under disclosure requirement G1-6 – Payment practices, sub-topic "Management of relationships with suppliers" in the "Business conduct" chapter, which are not reported, are an exception. This information was deemed non-material in the context of the materiality assessment, as it holds no significance concerning the sustainability aspect given the identified positive impact.



# **Environmental information**

## Disclosures as per EU Taxonomy

Information on taxonomy-eligible and taxonomy-aligned revenues, capital expenditure and operating expenses (maintenance, research and development) in accordance with the EU taxonomy is provided below. During the 2024/25 financial year, Südzucker Group's economic activities were to be examined and analyzed for the first time with regard to all six environmental objectives in terms of their taxonomy eligibility and alignment. The following key figures relate to the companies fully consolidated in the consolidated financial statements and were derived uniformly throughout the group using the IFRS data on which these consolidated financial statements are based.

An economic activity is considered taxonomy-aligned if it makes a substantial contribution to at least one of the following environmental 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, and protection and restoration of biodiversity and ecosystems. In addition, the economic activity must not significantly harm the other environmental objectives (DNSH = do no significant harm) and must meet minimum safeguards, such as human rights. Taxonomy alignment is verified using the technical screening criteria per economic activity.

The individual Südzucker Group divisions worked with the support of the corporate functions to identify the relevant taxonomy-eligible economic activities and determine the taxonomy-eligible and taxonomy-aligned shares for all six environmental objectives. The analysis steps for the identification and assessment of the relevant economic activities and the necessary interpretation of

the EU taxonomy were performed according to central guidelines. The individual revenues, capital expenditures and operating expenses are each assigned to an economic activity. The economic activities "Construction of new buildings" and "Renovation of existing buildings" are taxonomy-eligible for both the environmental objective of climate change mitigation and the transition to a circular economy. Taking into account the technical assessment criteria, the environmental objective of climate change mitigation was classified as more relevant for the implemented construction and renovation projects and consequently, in the reporting form these projects were assigned accordingly. Double counting when determining the metrics is therefore excluded. Where necessary, allocation keys were used to derive taxonomy-eligible and taxonomy-aligned revenues, capital expenditures and operating expenses.

The scope of the report refers to the environmental objectives of climate change mitigation and transition to a circular economy, as no taxonomy-eligible economic activities were identified for the other environmental objectives. As in the previous years, a large part of Südzucker's activities were not covered by the EU taxonomy in fiscal 2024/25 due to the legislative process still not being completed for all areas of activity, which is why they are not considered taxonomy-eligible. Our own sustainability targets, on the other hand, cover all of the group's economic activities and thus form the central steering tool in the further development of our business model and are therefore also relevant for the further development of our sustainable activities.

Due to outstanding definitions and unclear wording, application of the EU taxonomy requires our interpretation. The FAQ documents published by the EU Commission were considered accordingly.

# **Taxonomy reporting of revenues**

The reference values for the share of taxonomy-eligible and taxonomy-compliant revenues are the external revenues reported in the consolidated group income statement, which are explained in more detail under item (06).

As in the previous year, the largest contribution in taxonomyeligible revenues was attributable to the manufacture of ethanol for transport in the CropEnergies and starch segments (economic activity 4.13). The share of the reported taxonomy-aligned revenues of € 158 million or 1.6 % also mainly relates to revenues from self-produced fuel ethanol from waste and residual materials.

The relatively low share of taxonomy-aligned revenues compared to the share of taxonomy-eligible revenues is due to the fact that, according to the technical evaluation criteria under economic activity 4.13, only revenues from residue-based fuel ethanol are classified as taxonomy-aligned. The EU taxonomy regulation does not recognize the contribution that biofuels from arable and field crops make to reducing greenhouse gas emissions from transport. Nor does it take into account that ethanol must be certified as sustainable under the requirements of the Renewable Energy Directive, which is also an EU regulation.

The contribution to climate change mitigation and the impairment of other environmental objectives for the taxonomy-aligned revenues from residue-based fuel ethanol was reviewed according to activity-specific criteria. Among other things, the review included an analysis of climate risks using a climate change scenario analysis (→ ESRS 2 General Disclosures/Additional information on the processes to identify and assess material impacts, risks, and opportunities related to the environment). To prove the avoidance of the adverse effects with respect to the

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environmental objectives of water protection, prevention reduction and biodiversity protection, factory-specific queries were used. One of the factors taken into account was that the CropEnergies BioWanze plant is located less than one kilometer away from a nature reserve. The documents and expert opinions issued as part of the approval procedures for the plants concerned, e.g. in the area of emissions to air and water, formed the basis for checking compliance with the DNSH criteria. Finally, the criteria for

minimum safeguards, including a human rights-related due diligence process, were reviewed for the entire group across all activities. Taxonomy-aligned ethanol revenues were generated exclusively from contracts with customers.

# Share of taxonomy-eligible and taxonomy-aligned revenues

			2024/25				Substant	ial contribut	ion criteria		DNSH criteria ("Does Not Significantly Harm")								
Economic activities	Code 1	Turnover	Proportion of turnover	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaption	Water and marine resources	Pollution	Circular economy	Biodiversity	afe '	Proportion of Taxono- my-aligned (A.1.) or -eligible (A.2.) turnover 2023/24	Category enabling activity	Category transition
		€ million	%	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	%	Е	1
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Manufacture of biogas and biofuels for use in transport and of bioliquids	CCM 4.13	154	1.6	Y	N/EL	N/EL	N/EL	N/EL	N/EL	_	Y	Y	Y		Y	Y	1,4		
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		154	1.6	1.6	0.0	0.0	0.0	0.0	0.0	_	Y	Y	Υ		Y	Y	1.4		
of which enabling		0	0.0	0.0	0.0	0.0	0.0	0.0	0.0								0.0	E	
of which transitional		1	0.0	0.0							Υ -	Υ	Y	_	Υ	Υ	0.0		Т
A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Manufacture of biogas and biofuels for use in trans- port and of bioliquids	CCM 4.13	638	6.6	EL	N/EL	N/EL	N/EL	N/EL	N/EL								7.0		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (A.2)		638	6.6	6.6	0.0	0.0	0.0	0.0	0.0								7.0		
A. Total (A.1 + A.2)		792	8.2	8.2	0.0	0.0	0.0	0.0	0.0								8.4		
B. Taxonomy-non-eligible activities																			
Turnover of Taxonomy-non-eligible activities (B.)		8,902	91.8																
Total (A. + B.)		9,694	100.0																

1 The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the Section number of the activity in the relevant Annex covering the objective.



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# Taxonomy reporting on capital expenditures (CapEx)

Capital expenditures comprise additions to fixed assets and intangible assets (including acquisitions, excluding goodwill) and are further explained under (02) "Scope of consolidation", (21) "Intangible assets" and (22) "Fixed assets (including leases)".

On the one hand, the share of taxonomy-eligible investments in fixed assets of around 29 % is attributable to the production locations at which taxonomy-eligible revenues are already being generated. These include investments in the CropEnergies segment in conjunction with the production of fuel ethanol

(economic activity 4.13). On the other hand, Südzucker Group invests in other production sites, for example in wastewater treatment (economic activities 5.1 and 5.3) and, as part of the planned switch to lower-emission energy sources, in CHP plants (e.g. 4.16, 4.20 and 4.30). Excluding economic activity 4.13, these CapEx expenses fall under the so-called category c: Purchase of output from taxonomy-aligned economic activities.

As in the previous year, taxonomy-aligned investments exclusively comprise additions to fixed assets; taxonomy-aligned investments were immaterial in fiscal 2024/25. This results, among other

things, from the classification under the economic activity 4.13, which is derived based on the taxonomy-aligned revenue share at the respective plant level. The allocation key ensures that only those plants and production processes that are related to economic activity 4.13 are taken into account. The significantly lower taxonomy alignment compared to taxonomy eligibility can be attributed in particular to the fact that the obligation to provide evidence for CapEx category c must be provided by the suppliers. Compared to the previous year, the share of taxonomy-aligned investments in total investments remained almost constant.

# Share of taxonomy-eligible and taxonomy-aligned capital expenditure

			2024/25				Substantia	al contribut	ion criteria		("D	oes Not		DNSH c					
Economic activities	Code 1	CapEx	Proportion of CapEx	ang	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaption	Water and marine resources	Pollution	Circular economy	Biodiversity	Diodiversity Minimum safeguards	Proportion of Taxono- my-aligned (A.1.) or -eligible (A.2.) CapEx 2023/24	Category enabling activity	Category transition activity
		€ million	%	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	%	Е	Т
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Manufacture biogas and biofuels for use in transport and of bioliquids	CCM 4.13	2	0.3	Y	N/EL	N/EL	N/EL	N/EL	N/EL		Y	Y	Y		Y	Y	0.2		
Production of heat/cool from bioenergy	CCM 4.25	2	0.3	Y	N/EL	N/EL	N/EL	N/EL	N/EL		Y	_	Y	Y	Y	Y	1.2		
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	0	0.0	Υ	N/EL	N/EL	N/EL	N/EL	N/EL	_	Y	Υ		_	Y	Y	0.2		
Construction, extension and operation of waste water collection and treatment	CCM 5.3	0	0.0	Y	N/EL	N/EL	N/EL	N/EL	N/EL	_	Y	Υ	Y		Y	Y	0.4		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0	0.0	Υ	N/EL	N/EL	N/EL	N/EL	N/EL	_	Y	_	Υ	Υ	_	Υ	0.2		Т
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		4	0.6	0.6	0.0	0.0	0.0	0.0	0.0		Y	Y	Y	Y	Y	Y	2.2		
of which enabling		0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		Y		Y		Υ	Υ	0.0	E	
of which transitional		0	0.00	0.0							Y	Y	Y	Y	Y	Y	0.2		Т
A 2. Tayanamy Elizible but not anyinannantally avetainable																			

A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)

# Share of taxonomy-eligible and taxonomy-aligned capital expenditure

	DNSH criteria 2024/25 Substantial contribution criteria ("Does Not Significantly Harm")																		
conomic activities	Code 1	CapEx	Proportion of CapEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Gircular economy	Biodiversity	Climate change mitigation	Climate change adaption	Water and marine resources	Pollution	Circular economy	Biodiversity	Minimum safeguards	Proportion of Taxono- my-aligned (A.1.) or -eligible (A.2.) CapEx 2023/24	Category enabling activity	Category transition activity
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Manufacture of hydrogen	CCM 3.10	0	0.0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.2		
Electricity generation using solar photovoltaic technology	CCM 4.1	0	0.0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.2		
Manufacture biogas and biofuels for use in transport and of bioliquids	CCM 4.13	19	3.2	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.8		
Installation and operation of electric heat pumps	CCM 4.16	7	1.2	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.5		
Cogeneration of heat/cool and power from bioenergy	CCM 4.20	47	7.8	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0		
Production of heat/cool using waste heat	CCM 4.25	0	0.0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.4		
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	30	5.0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								3.3		
Construction, extension and operation of waste water collection and treatment	CCM 5.3	10	1.7	EL	N/EL	N/EL	N/EL	N/EL	N/EL								3.2		
Freight rail transport	CCM 6.2	0	0.0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.2		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	2	0.3	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.5		
Construction of new buildings	CCM 7.1/CE 3.1	0	0.0	EL	N/EL	N/EL	N/EL	EL	N/EL								1.1		
Renovation of existing buildings	CCM 7.2/CE 3.2	44	7.3	EL	N/EL	N/EL	N/EL	EL	N/EL								0.5		
Installation, maintenance and repair of energy effciency equipment	CCM 7.3	12	2.0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.9		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (A.2)		171	28.5	28.5	0.0	0.0	0.0	0.0	0.0								13.8		
A. Total (A.1 + A.2)		175	29.1	29.1	0.0	0.0	0.0	0.0	0.0								16.0		
B. Taxonomy-non-eligible activities																			
Turnover of Taxonomy-non-eligible activities (B.)		426	70.9																
Total (A. + B.)		601	100.0																

<sup>&</sup>lt;sup>1</sup> The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the Section number of the activity in the relevant Annex covering the objective.

ADDITIONAL INFORMATION

Sustainability statement

# Share of taxonomy-eligible and taxonomy-aligned operating expenses (OpEx)

Operating expenses are calculated as the sum of maintenance expenses, including ongoing maintenance, research and development costs and costs of short-term leases. Production-related operating expenses, especially for the use of sustainable raw materials or energy sources, are not included in the numerator as per EU Taxonomy.

The share of taxonomy-eligible maintenance expenses and costs of short-term leases is attributable to the production locations at which taxonomy-eligible revenues are already being generated. The share of taxonomy-eligible research and development costs is attributable primarily to process optimization projects to cut energy consumption.

Only research projects for the reduction of carbon emissions related to the economic activity 4.13 fuel ethanol production, for

which technical screening criteria are defined, were taken into account.

The share of taxonomy-aligned operating expenses predominantly related to ongoing maintenance and was less than 1 %. In this case, the situation is comparable to the revenues disclosure from fuel ethanol, in that the maintenance expenses of the ethanol production plants could only be taken into account on a pro rata basis for the production of residue-based ethanol.

# Share of taxonomy-eligible and taxonomy-aligned operating expenses

			2024/25				Substantia	al contribut	ion criteria	C	NSH crite	ria ("Doe	s Not Sigr	nificantly	Harm")				
Economic activities	Code 1	Opex	Proportion of OpEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaption	Water and marine resources	Pollution	Circular economy	Biodiversity	Minimum safe- guards	Proportion of Taxono-my-aligned (A.1.) or -eligible (A.2.) Opex 2023/24	Category ena- bling activity	Category transi-
		€ million	0/0	Y;N; N/EL	V·N· N/EI	V·N· N/EI	V·N· N/EI	V·N· N/FI	V·N· N/EI	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%		
A. Taxonomy-eligible activities				1,14, 147 EE	1,14, 147 LL	1,14, 147 EE	1,14, 147 EE	1,14, 147 LL	1,14, 147 EE						1714	1714			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Manufacture biogas and biofuels for use in transport and of bioliquids	CCM 4.13	3	0.9	Y	N/EL	N/EL	N/EL	N/EL	N/EL		Y	Y	Y		Υ Υ	Y	0.5		
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		3	0.9	0.9	0.0	0.0	0.0	0.0	0.0								0.5		
of which enabling		0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Y	Υ .	Y	Y	Υ	Y	Y	0.0	E	
of which transitional		0	0.0	0.0						Υ Υ	Υ .	Υ .	Y	Υ	Y	Y	0.0		1
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Manufacture biogas and biofuels for use in transport and of bioliquids	CCM 4.13	16	4.7	EL	N/EL	N/EL	N/EL	N/EL	N/EL								3.6		
Close to market research, development and innovation	CCM 9.1	6	1.8	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.1		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (A.2)		22	6.5	0.0	0.0	0.0	0.0	0.0	0.0								4.7		
A. Total (A.1 + A.2)		25	7.4	7.4	0.0	0.0	0.0	0.0	0.0								5.2		
B. Taxonomy-non-eligible activities																			
Turnover of Taxonomy-non-eligible activities (B.)		317	92.6																
Total (A. + B.)		342	100.0																

<sup>1</sup> The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the Section number of the activity in the relevant Annex covering the objective.

# Additional information on the Scope of Taxonomy eligibility and alignment per environmental objective

Pursuant to Annex V of Commission Delegated Regulation 2023/2486 as of 27 June 2023, the disclosure requirements for revenues, CapEx and OpEx key performance indicators have been expanded. Non-financial undertakings are now additionally required to report the scale of the taxonomy-eligible and taxonomy-aligned activities for each environmental objective. The corresponding disclosures are shown in the tables below:

# Share of revenues in total revenues per environmental objective

Proportion of turnover/Total turno	Proportion	f turnover/Total	turnove
------------------------------------	------------	------------------	---------

Environmental objective	Taxonomy-aligned per objective	Taxonomy-eligible per objective
Climate change mitigation (CCM)	1.6 %	8.2 %
Climate change adaptation (CCA)	0.0 %	0.0 %
Water and marine resources (WTR)	0.0 %	0.0 %
Pollution (PPC)	0.0 %	0.0 %
Circular economy (CE)	0.0 %	0.0 %
Biodiversity (BIO)	0.0 %	0.0 %

TABLE 036

# Share of capital expenditure in total capital expenditure per environmental objective

## Proportion of CapEx/Total CapEx

Environmental objective	Taxonomy-aligned per objective	Taxonomy-eligible per objective
Climate change mitigation (CCM)	0.6 %	29.1 %
Climate change adaptation (CCA)	0.0 %	0.0 %
Water and marine resources (WTR)	0.0 %	0.0 %
Pollution (PPC)	0.0 %	0.0 %
Circular economy (CE)	0.0 %	7.3 %
Biodiversity (BIO)	0.0 %	0.0 %

# Share of operating expenses in total operating expenses per environmental objective

### Proportion of OpEx/Total OpEx

Environmental objective	Taxonomy-aligned per objective	Taxonomy-eligible per objective
Climate change mitigation (CCM)	0.9 %	7.4 %
Climate change adaptation (CCA)	0.0 %	0.0 %
Water and marine resources (WTR)	0.0 %	0.0 %
Pollution (PPC)	0.0 %	0.0 %
Circular economy (CE)	0.0 %	0.0 %
Biodiversity (BIO)	0.0 %	0.0 %

TABLE 038

# Complementary Delegated Act (EU) 2022/1214 – Disclosure standard templates in accordance with Article 8 paragraphs 6 and 7 of the Taxonomy Regulation

The following provides additional information regarding Südzucker Group's taxonomy-eligible and taxonomy-aligned nuclear energy and fossil gas related activities. The presentation is based on the standard reporting templates required by the Complementary Delegated Act (EU) 2022/1214.

# Declaration form 1: Nuclear- and fossil-gas-related activities

Row	Nuclear-energy-related activities	Yes/ No
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
Row	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.	Yes
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

Sustainability statement

# Declaration form 2: Taxonomy-aligned economic activities (denominator)

				Amoun	it and pro	portion of r	evenue			Amo	unt and	proportion of	CapEx			Am	ount and	proportio	n of OpEx
		CCI	M + CCA	Climate mitigation		Climate adaptation		CC	M + CCA		change n (CCM)	Climate of adaptation		СС	M + CCA		change n (CCM)		e change ion (CCA)
Row	Economic activities	€ million	%	€ million	%	€ million	% €	million	%	€ million	%	€ million	%	€ million	%	€ million	%	€ million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_		_		_	_	_	_	_	_	_	_	_	_	_	_	_	_
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_	_	_	_	_	_	_	_	-	_	_	_	-	-	-	-	_	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_		_		_	_	_	_	_	_	_	_	_	_	_	_	_	_
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI			_							_								_
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_		_		_	_	_		_	_	_	_						_
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_				_	_				_	_			_		_		_
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	154	1.6	154	1.6	_	_	4	0.7	4	0.7		_	3	0.9	3	0.9	_	_
8	Total applicable KPI	9,694	100	9,694	100			601	100	601	100		_	342	100	342	100		_



COMBINED MANAGEMENT REPORT

# Declaration form 3: Taxonomy-aligned economic activities (numerator)

				Amount ar	nd pro	portion of re	evenue			Amo	unt and	proportion of	f CapEx			Am	ount an	d proportio	n of OpEx
	_	CCN	1 + CCA	Climate cha mitigation (C		Climate adaptation		C	CM + CCA		change n (CCM)			CC	CM + CCA	Climate mitigatio	change n (CCM)		te change tion (CCA)
Row	<b>Economic activities</b>		%	€ million	% :	€ million	%	€ million	%	€ million	%	€ million	%	€ million	%	€ million	%	€ million	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	_	_	_	_	_		_	_		_	_	=		_		_		
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	_		_	_	_	_	_	_	_	_	_	_	_	_		_	_	_
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	_			_			_	_		_				_				
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	_	_				_	_			_		_				_		_
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	_			_			_	_		_			_	_		_		
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	_			_						_						_		
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	154	100	154	100	_	_	4	100	4	100		_	3	100	3	100	_	_
8	Total applicable KPI	154	100	154	100		_	4	100	4	100		_	3	100		100		



Sustainability statement

# Declaration form 4: Taxonomy-eligible but not taxonomy-aligned economic activities

				Amount	and pro	portion of	revenue			Amo	unt and p	proportion of	CapEx			Amount	and proportion	on of OpEx
		CCN	1 + CCA	Climate mitigation		Climat adaptati	e change on (CCA)	CCI	M + CCA		change on (CCM)			CCM	M + CCA	Climate char mitigation (CC		ate change ation (CCA)
Row	<b>Economic activities</b>		%	€ million	%	€ million	% 4	million	%	€ million	%	€ million	% :	€ million	%	€ million	% € million	%
1	Amount and proportion of taxonomy-eligable economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_					_	_	_	_	_			_		_		_
2	Amount and proportion of taxonomy-eligable economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_	_	_	_	_	-	_	_	_	_	_	_	_	_	-		_
3	Amount and proportion of taxonomy-eligable economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_	_	_		_		_	_	_	_	_		_		_		_
4	Amount and proportion of taxonomy-eligable economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_	_	_	_	_	_	_	_	_	_	_	_	_	_	_		_
5	Amount and proportion of taxonomy-eligable economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_	_			_	_	30	5.0	30	5.0			_	_	_		
6	Amount and proportion of taxonomy-eligable economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI					_		_						_				
7	Amount and proportion of other taxonomy-eligable economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	638	6.6	638	6.6		_	141	23.5	141	23.5		_	22	6.4	22 6	.4 -	
8	Total applicable KPI	638	6.6	638	6.6			171	28.5	171	28.5		_	22	6.4	22 6	.4 –	



COMBINED MANAGEMENT REPORT

		Amount ar	nd Share	Amount an	d Share	Amount a	nd Share
			Revenue		CapEx		ОрЕх
Row	Economic activities	€ million	%	€ million	%	€ million	%
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-			_		
2	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		_				_
3	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	_	_	_	_	_	_
4	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		_	_	_	_	_
5	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		_	_	_	_	_
6	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		_	_	_	_	_
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	8,902	91.8	426	70.9	317	92.7
8	Total applicable KPI	8,902	91.8	426	70.9	317	92.7

# Environmental information ESRS E1 – Climate change

# ESRS 2 SBM-3 – Material impacts, risks and opportunities

Südzucker Group has performed a double materiality assessment in accordance with ESRS 1 to identify material impacts, risks and opportunities (IROs).

Our materiality assessment in the area of "climate change" revealed the following material sub-topics: Climate change-mitigation and adaptation and energy. The following is a more detailed description of the IROs identified as material to climate change for the Südzucker Group, along with an explanation of their connection to the corporate strategy and business model.

The material impacts, risks, and opportunities can be linked to the following fields of action:

## Reduction of GHG emissions in production (Scope 1 and 2)

The current use of fossil energy (12-E1) results in Scope 1 and 2 (7-E1) greenhouse gas (GHG) emissions within Südzucker Group's own operations. Part of the energy demand is already covered by the use of renewable energy (13-E1). As part of its policy to reduce Scope 1 and 2 GHG emissions, the Südzucker Group is planning further action to expand the use of renewable energy (→ section "Action to reduce GHG emissions in production (Scope 1 and 2)".

The following risks arise from the energy used to manufacture goods and the transformation to climate-neutral production:

- Medium and long-term investment risks result from the technical implementation of actions to reduce GHG emissions in the company's own operations (9-E1).
- In light of the fact that Südzucker Group's energy usage is largely subject to regulatory requirements from emissions trading systems (e.g., the EU ETS I), there are long-term cost risks arising from the diminishing free allocation of emission allowances and from a rising CO<sub>2</sub> price (10-E1).
- Purchases largely cover the energy required to manufacture the goods. This involves medium- and long-term energy price risks (14-E1).

#### Reduction of GHG emissions in the value chain (Scope 3)

In the upstream value chain, Scope 3 (8-E1) GHG emissions arise primarily from the production of purchased agricultural raw materials (category 1), from activities related to fuels and energy (category 3)<sup>1</sup>, and from upstream transportation (category 4).

Extreme weather events, which are more likely to occur as a result of climate change, can lead to crop failures in Südzucker Group's agricultural supply chains, representing a long-term risk (5-E1). The identification and assessment of climate change-related risks concerning the upstream value chain are described in  $\rightarrow$  ESRS 2 General disclosures.

## Material impacts, risks and opportunities (IROs) related to climate change

Material sub-topics	IRO	Short description	Category	potential	Value chain	Origin	Time-horizon
	1-E1	Providing bioenergy to substitute fossil fuel	Positive impact	Actual	Downstream value chain	CropEnergies AGRANA	Short-term Medium-term Long-term
	2-E1	Providing bio-based chemicals	Positive impact	Potential	Downstream value chain	CropEnergies	Medium-term Long-term
	3-E1	Ban on combustion engines in the EU 27 for cars and vans by 2035	Transition risk	_	Own operations	CropEnergies	Medium-term Long-term
Climate change adaptation	4-E1	Investment risks from the technical implementation of projects in the area of bio-based chemicals	Transition risk	_	Own operations	CropEnergies	Medium-term Long-term
	5-E1	Crop failures due to extreme weather events caused by climate change in the agricultural supply chains	Physical risk	-	Upstream value chain	Südzucker Group	Long-term
	6-E1	New development options in the area of bio-based chemicals	Opportunity	_	Own operations	CropEnergies	Medium-term Long-term

<sup>&</sup>lt;sup>1</sup> Unless otherwise included in GHG emissions Scope 1 or Scope 2.

**COMBINED MANAGEMENT REPORT** 

# Material impacts, risks and opportunities (IROs) related to climate change

	Short description	Category	potential	Value chain	Origin	Time-horizon
7-E1	Greenhouse gas emissions (Scope 1 and 2)	Negative impact	Actual	Own operations	Sugar division (Südzucker), BENEO, CropEnergies, AGRANA	Short-term Medium-term Long-term
8-E1	Greenhouse gas emissions (Scope 3)	Negative impact	Actual	Upstream value chain	Sugar division (Südzucker), BENEO, Freiberger, CropEnergies, AGRANA	Short-term Medium-term Long-term
9-E1	Investment risks from the technical implementation of the GHG reduction measures	Transition risk	-	Own operations	Südzucker Group	Medium-term Long-term
10-E1	Risks from the regulations and adjustments of the emissions trading scheme	Transition risk	_	Own operations	Sugar division (Südzucker), BENEO, CropEnergies, AGRANA	Long-term
11-E1	New development options for biomass-based products	Opportunity	_	Own operations	Sugar division (Südzucker), BENEO, CropEnergies, AGRANA	Medium-term Long-term
12-E1	Use of fossil resources	Negative impact	Actual	Own operations	Sugar division (Südzucker), BENEO, CropEnergies, AGRANA	Short-term Medium-term Long-term
47.54					Südzucker	Short-term Medium-term
13-E1	Use of renewable energy	Positive impact	Actual	— Own operations	_ <u>_                                    </u>	Long-term
<u>14-E1</u>	Energy price risks	Transition risk	. <del>-</del>	Own operations	Sugar division (Südzucker), CropEnergies, AGRANA	Medium-term Long-term
	8-E1 9-E1 10-E1 11-E1 12-E1 13-E1	7-E1 (Scope 1 and 2)  Greenhouse gas emissions (Scope 3) Investment risks from the technical implementation of the GHG reduction measures  Risks from the regulations and adjustments of the emissions trading scheme  New development options for biomass-based products  11-E1 Use of fossil resources  13-E1 Use of renewable energy	7-E1 (Scope 1 and 2) impact  8-E1 (Scope 3) Negative impact  Investment risks from the technical implementation of the GHG reduction measures Transition risk  Risks from the regulations and adjustments of the emissions trading scheme Transition risk  New development options for biomass-based products Opportunity  11-E1 Use of fossil resources impact  Negative impact  13-E1 Use of renewable energy Positive impact	7-E1 (Scope 1 and 2) impact Actual  8-E1 (Scope 3) Negative impact Actual  Investment risks from the technical implementation of the GHG reduction measures Transition risk —  Risks from the regulations and adjustments of the emissions trading scheme Transition risk —  New development options for biomass-based products Opportunity —  New development options for biomass-based products Opportunity —  12-E1 Use of fossil resources impact Actual  13-E1 Use of renewable energy Positive impact Actual	Greenhouse gas emissions (Scope 3)  Investment risks from the technical implementation of the GHG reduction measures  Risks from the regulations and adjustments of the emissions trading scheme  Transition risk — Own operations  New development options for biomass-based products  New development options for biomass-based products  Negative impact — Own operations  Negative impact — Own operations  Negative impact — Actual — Own operations  Negative impact — Actual — Own operations  Negative impact — Actual — Own operations	Sugar division (Südzucker)   Sugar division (Südzucker)

### Provision of biomass-based products for the non-food sector

Providing bioenergy (1-E1) is already part of the Südzucker Group's business model. This includes ethanol production in the CropEnergies and Starch segments. Along with this, there are medium and long-term transition risks that are causing the fuel ethanol market in Europe to shrink (3-E1).

As part of the Group Strategy 2026 Plus, the establishment of the bio-based chemicals business area in the CropEnergies segment is planned (2-E1). This offers medium- and long-term market opportunities for CropEnergies within the Südzucker Group and prospects for reducing GHG emissions in the downstream value chain (6-E1). Medium and long-term investment risks are associated with setting up and operating of plants for producing bio-based chemicals (4-E1).

Market opportunities for biomass-based products (11-E1) arise for the Südzucker Group in other areas, for example, as part of the transition to a circular economy for bio-based packaging.

# Resilience of the strategy and business model in relation to climate change

For the Südzucker Group, there is no group-wide formal resilience analysis in accordance with ESRS E1. Nevertheless, there are resilience analyses of individual group segments. This leads to the conclusion that our business model is resilient in the face of climate change.

# **Targets**

# E1-4 – Targets related to climate change mitigation and adaptation

# Targets for reducing GHG emissions in production (Scope 1 and 2) and in the value chain (Scope 3)

In February 2022, the Südzucker Group joined the Science Based Targets initiative (SBTi). Based on the validation of our GHG emission reduction targets by SBTi in February 2023, we assume that they are scientifically grounded and aligned with the Paris Agreement.

The target for reducing GHG emissions by the target year of 2030 was set based on the SBTi requirements for near-term targets, which cover a period of five to ten years from the date the targets are submitted to the SBTi.

Südzucker Group has committed to reducing absolute GHG emissions from its own business operations (Scope 1) and from the purchase of energy (market-based Scope 2) by 50.4 % by 2030 – based on 3.7 million tonnes of  $\rm CO_2$  in the base year 2018 used for comparison. The target is in line with the SBTi requirements for limiting global warming to 1.5 °C.

Südzucker has also set a group reduction target for absolute GHG emissions in its value chain (Scope 3). In line with the SBTi criteria, we have committed to reducing these emissions by at least 30 % by 2030 compared to the year 2018, starting from 8.2 million tonnes of  $CO_2$  in the base year 2018 (for categories 1, 3 and 4). The target is in line with the SBTi requirements for limiting global warming to 2 °C.

The target for reducing GHG emissions by the target year 2050 was set on the basis of the "Pathways to Net-zero — SBTi Technical Summary" from October 2021\*. This SBTi standard sets the requirement for a long-term target which SBTi considers to align with limiting global warming to 1.5 °C. A net-zero target has not been set for Südzucker Group.

When setting our climate targets, we incorporated the perspectives of our material stakeholder groups, including investors and customers. This was achieved, among other things, by involving the group sustainability board.

The connection between our climate targets related to Scope 1, 2 and 3 and the targets of the policies "Reduction of GHG emissions in production (Scope 1 and 2)" and "Reduction of GHG emissions in the value chain (Scope 3)" is as follows:

- We already use renewable energies in our own operations and want to expand this share.
- With regard to GHG emissions in our own operations, we focus on increasing energy efficiency, continuing the phase-out of coal use, switching fuels, using renewable energies and, to a lesser extent, on the electrification of process heat generation.

# Target path for GHG emissions reduction

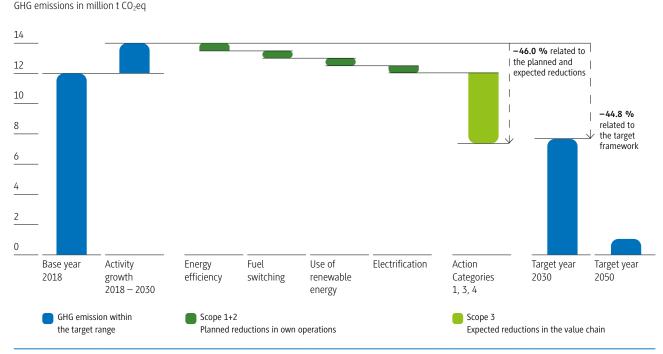


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 When considering GHG emissions from the upstream and downstream value chain, the focus is on GHG emissions from agricultural raw material production (category 1) and, to a lesser extent, on GHG emissions associated with upstream transportation (category 4).

From today's perspective, we will be below the 2030 target framework emissions value of 7,558,991 t  $CO_2$ eq with the expected reductions of Scope 1, 2 and 3 GHG emissions to 7,392,870 t  $CO_2$ eq. Südzucker Group's current performance compared to specified targets is outlined in the  $\rightarrow$  section "Gross Scopes 1, 2, 3 and Total GHG emissions". The responsible corporate function monitors and reviews the targets on an annual basis. The metrics used are Scope 1 gross GHG emissions, Scope 2 market-based gross GHG emissions, and Scope 3 GHG emissions categories 1, 3 and 4. Trends or significant changes in the company's performance with regard to achieving its targets are also presented in the  $\rightarrow$  section "Gross Scopes 1, 2, 3 and Total GHG emissions".

Relevant greenhouse gases are primarily fossil CO<sub>2</sub>, methane, and nitrous oxide. Scope 1 GHG emissions also include emissions of other greenhouse gases from the use of refrigerants.

The targets include – relative to the base year 2018 – 97.6 % of Scope 1 and Scope 2 (market-based) GHG emissions and 96.6 % of Scope 3 GHG emissions in the upstream value chain in Südzucker Group's target framework.

For the target years 2030 and 2050, about one-third of the reductions can be attributed to Scope 1 GHG emissions and about two-thirds to Scope 3 GHG emissions. Scope 2 GHG emissions are of lesser significance.

# Climate targets and decarbonization levers of the Südzucker Group

kt CO <sub>2</sub> eq	Base year 2018	2030 target	Up to 2050 target
GHG emissions within the target range	11,867	7,559	1,127
Increase in Scope 1-3 GHG emissions within the target range due to capacity increase		1,827	
Planned reduction of Scope 1 and 2 GHG emissions through			
Energy efficiency		-735	
Fuel switching		-570	
Use of renewable energies		-681	
Electrification of process heat generation		-268	
Reduction of GHG emissions Scope 3 Categories 1, 3, 4		-4,047	

TABLE 045

The targets are based on the climate scenarios of SBTi, as described in the SBTi document "Foundations of Science-based Target Setting" from April 2019\*.

The rise in capacity is based on the Südzucker Group's five-year production plan and taken into account accordingly. However, this increase in GHG emissions will be offset by actions to reduce GHG emissions.

The baseline value depends in particular on the quantity of processed agricultural raw materials. The calculation was based on the GHG emissions in the base year 2018, i.e., a period of 365 days.

In particular, new technologies are to be introduced as part of the GHG reduction measures related to the decarbonization levers of energy efficiency and electrification.

When setting the targets for reducing GHG emissions, the transition risks associated with the EU Emissions Trading System (10-E1), resulting from the current use of fossil fuels, were factored in.

Energy price risks (14-E1), investment risks from GHG reduction measures (9-E1) and the risk of physical crop failures (5-E1) are taken into account at the level of actions.

# Provision of biomass-based products for the non-food sector (substitution of fossil-based products)

Südzucker Group's strategy includes providing biomass-based products for the non-food sector in order to replace fossil-based products.

At this time, the Südzucker Group has not set any quantitative targets for this field of action due to the ongoing development of political and legal frameworks.

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# Impact, risk and opportunity management

# E1-2 – Policies related to climate change mitigation and adaptation

The policies for reducing GHG emissions in production and in the value chain aim to minimize the respective GHG emissions and are implemented as part of the climate target management process. They are applicable throughout the group and are planned to extend up to the target year 2050. The corporate function Climate, Environment, Health & Safety is responsible for monitoring. In this regard, the corporate function works closely with the executive board, which is responsible for implementation in the group companies.

### Policy on reducing GHG emissions in production (Scope 1 and 2)

To minimize GHG emissions in production, we plan to gradually implement measures in the following sectors:

- Energy efficiency
- Reduction of Scope 1 GHG emissions
  - · Continuation of the coal phase-out
  - Switching fuels (natural gas instead of coal or heating oils)
  - Use of renewable fuels (biogas, biomass, hydrogen).
     The own production and use of biogas/biomethane from manufacturing residues is particularly relevant.
  - (Partial) electrification of process heat generation
- Reduction of GHG emissions Scope 2 and expansion of renewable energy use
  - Purchase of electricity from renewable/non-fossil sources
  - Purchase of heat from renewable/non-fossil sources

A fundamental prerequisite for converting from fossil-based products to products from renewable sources is a suitable political and economic framework.

#### Policy on reducing GHG emissions in the value chain (Scope 3)

To minimize GHG emissions in the upstream value chain, we plan to gradually implement measures in the following sectors:

- Reduction of GHG emissions related to agricultural raw material production
- Reduction of GHG emissions related to transportation

In terms of adapting to climate change, there is not yet a separate group-wide policy for managing physical climate-related risks. Based on the current plan, the implementation is scheduled by fiscal year 2026/27. A group-wide uniform approach is in place for the analysis ( $\rightarrow$  ESRS 2 – General disclosures). The management of climate risks takes place within the companies of the Südzucker Group. They work continuously on deriving the required resilience measures to minimize respective risks and maintain business operations.

# Provision of biomass-based products for the non-food sector (substitution of fossil-based products)

A fundamental prerequisite for converting from fossil-based products to products from renewable sources is a suitable political and economic framework.

A formal policy for this sector does not exist as it represents a field of action for corporate strategy. Accordingly, this leads to measures such as the production of bioenergy, the production of intermediate products for the manufacture of bio-based plastics and/or

bio-based chemicals, the production of bio-based chemicals, and R&D measures for the (further) development of technologies for the manufacture of bio-based products.

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

The actions described here follow the aforementioned target horizon and should therefore be completed by 2030 and 2050. We regularly review the actions and advance them as required.

#### Actions to reduce GHG emissions in production (Scope 1 and 2)

Südzucker Group currently does not depend on the availability and allocation of funds to take these actions. Investments can be covered by operating activities.

Südzucker Group is not exposed to any coal, oil or gas activities. The company's current strategy does not require any adjustment of the business model in order to achieve the climate change targets. We regularly review our strategy. Consequently, Südzucker Group does not have a formal transition plan. We regularly assess the need to summarize the actions in a formal transition plan.

Our action plan for Scope 1 and 2 GHG emissions focuses on three areas. The primary focus is on actions to increase energy efficiency, such as replacing existing equipment with highly energy-efficient units, followed by actions to reduce Scope 1 and Scope 2 GHG emissions. A major contribution here will come from replacing our coal-fired equipment step-by-step, electrification and gradually converting to renewable fuels. In addition, we prepared a group-wide roadmap to obtain electrical energy from renewable sources. The switch to renewable fuels will specifically involve the self-generation and use of biogas and biomethane from

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Most of the actions identified are related to investments. The projects required to achieve the emission reduction targets identified in the various divisions will be sequentially included in the company's investment plans. Information on how sustainability-related metrics such as emissions and taxonomyaligned CapEx are considered when evaluating investments is provided in → ESRS 2 – General disclosures (section "Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies"). The investment planning process integrates and aligns with the overall business strategy and financial planning of the Südzucker Group. The planned investment measures are requested by the Südzucker Group companies and approved by the Südzucker Group's executive and supervisory boards. The portfolio of measures is regularly reviewed. Implementation of the measures leads to a reduction in greenhouse gas emissions, possibly with a delay.

Based on our action plan to achieve our climate change targets regarding Scope 1 and 2 GHG emissions, Südzucker Group has invested approximately € 300 million in capital expenditure and related preparatory investments that contribute to GHG reduction between 2020/21 and 2024/25. We plan to spend around € 230 million on these projects in the period from 2025/26 to 2030/31. We have not currently identified operating expenses that can be clearly attributed to the objectives.

Material actions implemented by Südzucker Group to reduce Scope 1 and 2 GHG emissions in its own operations in fiscal year 2024/25 are shown in the table  $\rightarrow$  Material actions to reduce GHG emissions (Scope 1 and 2) in own operations in fiscal year 2024/25.

There are currently no CapEx plans in accordance with the Commission Delegated Regulation (EU) 2021/2178.

Taxonomy-eligible investments under the environmental target of climate change mitigation by Südzucker Group amounted to € 171 million in 2024/25. This includes, in particular, investments in CHP plants as part of the planned coal phase-out (CCM 4.20 and 4.30), the installation of heat pumps (CCM 4.16 and 4.25), the operation of wastewater treatment plants (CCM 5.3) and renovation of existing buildings (CCM 7.2). Taxonomy-aligned investments were immaterial in fiscal 2024/25.

Some of the actions planned to achieve the 2030 climate change target related to Scope 1 can be assigned to activities within the meaning of the Delegated Regulation (EU) 2021/2139. Basically, these are

- 4.16 Installation and operation of electric heat pumps
- 4.19 Cogeneration of heat/cool and power from renewable non-fossil gaseous and liquid fuels
- 4.20 Cogeneration of heat/cool and power from bioenergy
- 4.23 Production of heat/cool from renewable non-fossil gaseous and liquid fuels
- 4.24 Production of heat/cool from bioenergy
- 4.25 Production of heat/cool using waste heat
- 4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels

# Material actions to reduce GHG emissions (Scope 1 and 2) in own operations in fiscal year 2024/25

Relevant decarbonization lever	Achieved/expected GHG reduction in t CO <sub>2</sub> eq/year	Assignment of CapEx and OpEx to line items in the financial statements	Taxonomy eligible	indicators in accordance with the Delegated Regulation (EU) 2021/2178
Fuel switching	31,900/28,400	Annex (22)	Yes	CCM 4.30
Energy efficiency	8,554/13,400	Annex (22)	No	_
Use of renewable energy	220/220	Annex (09)	No	
	Fuel switching  Energy efficiency	Fuel switching  Energy efficiency  Teduction in t CO <sub>2</sub> eq/year  31,900/28,400  8,554/13,400	Relevant decarbonization lever  Achieved / expected GHG reduction in t CO <sub>2</sub> eq / year  Fuel switching  31,900 / 28,400  Annex (22)  Energy efficiency  8,554 / 13,400  Annex (22)	Relevant decarbonization lever  Achieved / expected GHG reduction in t CO <sub>2</sub> eq / year  Fuel switching  31,900 / 28,400  Annex (22)  Fuel switching  8,554 / 13,400  Annex (22)  No

TABLE 047

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### Actions to reduce GHG emissions in the value chain (Scope 3)

Regarding Scope 3, we are specifically targeting reductions in GHG emissions from agricultural raw material production (category 1) and raw material transportation (category 4). A detailed action plan is planned for fiscal year 2025/26.

# Actions to provide biomass-based products for the non-food sector (substitution of fossil-based products)

Ongoing investment measures are required to implement this strategic field of action. The investment planning processes facilitate integration into and alignment with the general business strategy and financial planning of Südzucker Group. The planned investment measures are requested by the Südzucker Group companies and approved by Südzucker Group's executive and supervisory boards.

The following actions were implemented to substitute fossil-based products during the 2024/25 fiscal year:

- Research and development measures for the (further) development of technologies for the production of biomass-based products
- Purchase and operation of a plant for the production of ethanol from residues and waste
- Start of construction of a plant for the production of ethyl acetate from renewable carbon

Additional actions are regularly assessed.

#### Potential locked-in GHG emissions

Südzucker Group's business model consists of processing agricultural raw materials into biomass-based products. Consequently, locked-in GHG emissions mainly result from the

operation of our own power plants, provided they are operated with fossil fuels. Locked-in GHG emissions associated with the direct use-phase GHG emissions of sold products are therefore not relevant for the Südzucker Group, since these are biomass-based products. Products such as bioethanol that have been brought to market displace fossil-based products, thereby allowing third parties to reduce the amount of locked-in GHG emissions.

#### Major investments in coal, oil, and gas

In fiscal year 2024/25, no CapEx amounts were invested in economic activities related to coal, oil, and gas (NACE B.05, B.06, B.09.1, C.19, D.35.1, D.35.3, and G.46.71). The use of fossil fuels is being gradually reduced in accordance with the outlined action plan.

### **Exclusions for Paris-aligned benchmarks**

Südzucker Group does not meet the exclusion criteria specified in Article 12 (1) (d) to (g) of the Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Standards Regulation).

Südzucker Group is not aware of any exclusions based on Article 12 (2) of the Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Standards Regulation) and Commission Implementing Regulation (EU) 2022/2453 (Template I Climate Change Transition Risk).

#### Metrics

# E1-5 – Energy consumption and mix

The data was collected following the quality hierarchy of supplier data before measurement data before estimation. The energy quantities were calculated as lower heating values for fuels and as usable energy quantities for electrical energy, heat, steam and

cooling. Data validation is performed by an individual working at the location or by someone whose function is closely connected to the respective location.

The assessment of impact as a climate-intensive sector is carried out annually at the beginning of the fiscal year for each location. The classification is validated by an individual working at the location or by someone whose function is closely connected to the respective location. When a location is assigned to a climate-intensive sector, all fossil energy consumed in operations at the location is documented.

Südzucker Group's total net revenues originate from high climate impact sectors. The difference between total energy consumption (
Table: Total energy consumption and energy mix related to own operations) and total energy consumption from activities in high climate impact sectors corresponds to the energy consumption at Südzucker AG's administrative locations in Mannheim and AGRANA Beteiligungs-AG in Vienna (holding locations that do not contribute to net sales revenues).

Activities in sectors listed in Annex I, sections A and C of Regulation (EC) No 1893/2006 of the European Parliament and of the Council were used to calculate energy intensity.

The activities are to be assigned to sectors A (Agriculture, Forestry, Fisheries) and C (Manufacturing/Production of Goods).



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Total energy consumption and energy mix related to own operations (E1-5)	
MWh	2024/25
Total fossil energy consumption	12,124,261
threreof fuel consumption from coal and coal products	2,702,576
thereof fuel consumption from crude oil and petroleum products	93,766
thereof fuel consumption from natural gas	8,115,277
thereof fuel consumption from other fossil sources	386
thereof consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	1,212,256
Total consumption from nuclear sources	22,902
Total renewable energy consumption	2,360,900
thereof fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	1,577,952
thereof consumption of purchased or acquired electricity, heat, steam, and cooling from renewable energy sources	763,990
thereof consumption of self-generated non-fuel renewable energy	18,958
Total energy consumption	14,508,063
Share of fossil sources in total energy consumption (in %)	83.6 %
Share of renewable sources in total energy consumption (in %)	16.3 %
Share of consumption from nuclear sources in total energy consumption (%)	0.1 %
	TABLE 048
Non-renewable energy production and renewable energy production (E1-5)	
MWh	2024/25
Non-renewable energy production	0
Renewable energy production	8,569,131

### E1-6 – Gross Scopes 1, 2, 3 and total GHG emissions

The reporting includes fossil  $CO_2$ , methane, and nitrous oxide as relevant greenhouse gases. Scope 1 also includes emissions of other greenhouse gases from the use of refrigerants. The current global warming potential values published by the Intergovernmental Panel on Climate Change (IPCC), based on a 100-year time horizon, are used to calculate the emission level.

Significant Scope 3 categories are reported as those that account for at least 5 % of the total greenhouse gas emissions in Scope 3 of the upstream value chain of the Südzucker Group.

The metrics were identified in accordance with the principles, requirements and guidelines of the GHG Protocol's Corporate Standard (2004 version), for Scope 2 GHG emissions additionally in accordance with the principles, requirements and guidelines of the GHG Protocol's Corporate Standard for Scope 2 greenhouse gas emissions (2015 version) and for Scope 3 greenhouse gas emissions additionally according to the principles and provisions of the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011 version)\*.

Where available, supplier-specific emission factors were used. Secondary data is used to calculate Scope 3 GHG emissions. They are based on general industry standards, averages and published data sources that do not originate directly from the upstream value chain. Primary data has not yet been integrated.

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Scope 2: IEA v6, MLC

factors used

- Scope 3: Agri-footprint, ecoinvent und World Food LCA

Biogenic  $CO_2$  emissions were calculated using an emission factor of "0".

Supplier-specific emission factors were used for gross market-based Scope 2 GHG emissions where available; otherwise, the residual mix factors were applied.

The GHG emissions were derived from the scope of operational control. No deviations arise compared to the fully consolidated group.

Contrary to the GHG emissions reporting for the fiscal year 2024/25, the GHG emissions of smaller sites were not considered for the base year 2018. As such, the base year encompasses the following portions of GHG emissions under operational control: Scope 1 > 98.8 %, Scope 2 > 98.9 % and Scope 3 > 93.9 %.

For quality assurance purposes, a dual-control principle has been introduced at plant level for validating Scope 1 and 2 data. The validation is performed by an individual working at the location or by someone whose function is closely connected to the respective location. The validation of Scope 3 data is centrally managed by the corporate department Climate, Environment, Health & Safety.

In addition, a risk-based plausibility check is carried out by the Climate, Environment, Health & Safety corporate department for all data in Scope 1-3.

# Energy intensity in relation to activities in high climate impact sectors (E1-5)

(3)	Energy intensity from activities in high climate impact sectors (Million MWh/Billion €) (Ratio of lines 1 and 2)	1.50
(2)	Net revenue from activities in high climate impact sectors (Billion €)	9.70
(1)	Total energy consumption from activities in high climate impact sectors (Million MWh)	14.50

TABLE 050

### Gross Scopes 1, 2, 3 and total GHG emissions (E1-6)1

		Retrospective			Milestones and target year	
t CO₂eq	2018 (Base year)	2024/25	2030	% of target / base year	2050	% of target / base year
Scope 1 GHG emissions				· ·		
Scope 1 gross GHG emissions	3,034,307	2,722,192				
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	93.0	87.1				
Scope 2 GHG emissions						
Gross location-based Scope 2 GHG emissions	826,133	446,746				
Gross market-based Scope 2 GHG emissions	630,636	344,803	-	-		
Total gross GHG emissions, Scope 1 and 2	3,664,943	3,066,995	1,817,812	49.6		
Significant scope 3 GHG emissions						
Total Gross indirect (Scope 3) GHG emissions <sup>2</sup>	8,201,684	7,977,385	5,741,179	70.0		
thereof category 1 <sup>3</sup>	7,193,694	6,632,847				
thereof category 3	454,771	592,786				
thereof category 4	553,219	751,752				
Total GHG emissions						
Total GHG emissions (location- based)	12,062,124	11,146,323				
Total GHG emissions (market- based)	11,866,627	11,044,380	7,558,991	63.7	1,127,330	9.5
<sup>1</sup> GHG emissions Scope 1 and 2 relate to the fully consolida	ted group Non-consolidat	ed companies under one	erational control do no	t exist		

<sup>1</sup> GHG emissions Scope 1 and 2 relate to the fully consolidated group. Non-consolidated companies under operational control do not exist.

<sup>&</sup>lt;sup>2</sup> Total gross GHG emissions, Scope 3 categories 1, 3 and 4.

<sup>&</sup>lt;sup>3</sup> Services not included for reasons of materiality.

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Due to data availability reasons, all transports taking place in the upstream value chain have been accounted for in the transport emissions section (Scope 3 Category 4). We generally record transportation in the downstream value chain under Scope 3 Category 9 (classified as non-material). We use the transported tonnage and the average transported distance, which are partly estimated, in conjunction with a mode-of-transport-specific emission factor.

The biogenic emissions related to Scope 1 amount to 556,745 tonnes of  $CO_2$ eq from the combustion of organic materials. The emission factors we use (IEA v6, MLC, Agri-footprint, ecoinvent and World Food LCA) do not allow a breakdown by biogenic  $CO_2$  emissions, so the figures for Scope 2 and Scope 3 do not include any additional biogenic  $CO_2$  emissions.

The following contractual instruments are used for the purchase of energy from renewable sources:

- Heat: Heat supply contracts
- Electricity: Power Purchase Agreement contracts, contracts for the supply of certificates of origin and electricity supply contracts

No certificates of origin are available for January and February 2025 due to legal regulations. The purchase of electricity from renewable sources is ensured through contracts that have been concluded and remain in effect. We make use of contractual instruments for the purchase of energy that are 100 % bundled and 0 % unbundled with attributes about energy production to determine Scope 2 (market-based) GHG emissions.

The calculation of Scope 3 GHG emissions in the base year 2018 was based on the SBTi requirements for near-term targets as the sum of the GHG emissions in categories 1, 3 and 4. These categories were also used as the basis for determining the target values for the years 2030 and 2050.

### GHG intensity based on net revenue

2024/25
1.15
1.14

TABLE 052

The net revenues used to calculate the GHG intensity correspond to the revenues item in Südzucker Group's income statement.

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

In fiscal 2024/25, Südzucker Group did not achieve any greenhouse gas emission reductions through the removal and storage of greenhouse gases as part of projects developed within its own activities or to which it has contributed within its own upstream and downstream value chain. In fiscal year 2024/25, Südzucker Group did not engage in any climate change mitigation projects outside the value chain that were financed or intended to be financed by the purchase of  $\text{CO}_2$  certificates. In fiscal year 2024/25, the use of  $\text{CO}_2$  certificates to publicly claim GHG neutrality was not of any relevance.

# E1-8 — Internal carbon pricing

Südzucker Group uses an internal carbon pricing scheme to determine shadow prices for investment decisions. They are generally assessed as part of a scoring model in terms of profitability and sustainability. Decisions on such projects are based on a thorough analysis of the potential  $CO_2$  savings compared to the baseline scenario that would result from their successful implementation. This baseline refers to the  $CO_2$  emissions from energy consumption without taking into account the implementation of energy efficiency measures. A hypothetical investment price emerges from the  $CO_2$  savings, influencing the investment decision.

No use is made for the following purposes:

- Assessment of the useful life and the residual value of assets
- Impairment of assets
- Fair value measurement of assets acquired through business acquisitions

The internal CO<sub>2</sub> pricing scheme applies to companies in the fully consolidated scope (Category I of the shareholding list).

The calculation of the  $CO_2$  price used assumes a linear rise from the current  $CO_2$  market price of 67  $\mbox{\'e}/\mbox{t}$   $CO_2$  in 2024 within the EU ETS to 140  $\mbox{\'e}/\mbox{t}$   $CO_2$  by 2030.

The analysis was based on M. Pahle, J. Sitarz, S. Osorio (PIK), B. Görlach (Ecologic) (2022). The EU-ETS price through 2030 and beyond: A closer look at drivers, models and assumptions. Input material and takeaways from a workshop in Brussels on 30 November 2022, Kopernikus-Projekt Ariadne Potsdam-Institut für Klimafolgenforschung (PIK), Dezember 2022. The prices were considered relevant for the selected application because a high share of Südzucker AG's Scope 1 GHG emissions are subject to the EU ETS. Internal validation was performed by the corporate department Climate, Environment, Health & Safety.

# Environmental information ESRS E3 — Water and marine resources

# ESRS 2 SBM-3 – Material impacts, risks and opportunities

Südzucker Group has performed a double materiality assessment in accordance with ESRS 1 to identify material impacts, risks and opportunities (IROs).

Our materiality assessment for "water and marine resources" revealed a material sub-topic: Water. The following is a more detailed description of the IROs identified as material related to water and marine resources for the Südzucker Group, together with an explanation of their link to the corporate strategy and business model.

Our sugar factories and fruit juice concentrate production primarily cover their fresh water requirements with agricultural raw materials: Sugar beet consists of 75 % water and apples of 85 %. Additional needs are met by fresh water. Since it is — globally speaking — the most important resource, we strive to reduce the freshwater requirements of our factories — especially in areas with water stress — or to switch to alternative sources. Instead of drinking water or groundwater, for example, we use rainwater, river water or wastewater. Water recycling enables us to further reduce water withdrawal at our locations and thus achieve positive impacts (1-E3).

Südzucker Group operates 48 sites in areas with high or extreme water stress. We have assessed water withdrawal in these areas as a material negative impact (2-E3).

### Material impacts, risks and opportunities (IROs) related to water and marine resources

Material sub-topics	IRO	Short description	Category	Actual/ potential	Value Chain	Origin	Time-horizon
	1-E3	Reduced water withdrawal due to water recycling	Positive impact	Actual	Own operations	Sugar division (Südzucker), BENEO, CropEnergies, AGRANA	Medium-term
Water	2-E3	Water withdrawal in water stress areas	Negative impact	Actual	Own operations	Sugar (Südzucker) and agriculture divisions, BENEO, Freiberger, CropEnergies, AGRANA	Short-term Medium-term Long-term

TABLE 053

# Impact, risk and opportunity management

#### E3-1 – Policies related to water and marine resources

In 2024, we updated our group-wide environmental, energy, climate and occupational safety policy from 2021. It also covers the topic of water and is accessible to employees on the intranet. Südzucker Group is committed to reducing the resource requirements and environmental impact of its business activities. This includes complying with all legal and self-imposed requirements as well as continuously reviewing and optimizing plant designs and production processes.

With regard to the two material IROs, consistent water conservation by closing loops is also an inherent part of our production processes and hence a practiced approach at our locations. Reusing process water in the same or different process steps allows us to reduce the need for fresh water. Condensates from the sugar production process, for example, are reused for extraction purposes or for replenishing cooling circuits. By further reducing the demand for fresh water, we are trying to decrease our already small water footprint even further and amplify its positive effects. Beyond the identified materiality, we pursue this approach for all Südzucker Group locations, especially for those located in areas with high or extreme water stress. No formal policy is available.

Water withdrawal to cover the remaining fresh water requirements varies according to local water availability. We regularly assess water risks and develop specific actions at site level.



This approach is relevant for the two material IROs 1-E3 and 2-E3. It forms the basis for the positive impacts of Südzucker Group's activities and simultaneously addresses the negative impacts.

The corporate function Climate, Environment, Health & Safety is responsible for monitoring. In this regard, the corporate function works closely with the executive board, which is responsible for implementation in the group companies.

Südzucker Group does not currently pursue any policies relating to marine sustainability.

# E3-2 – Actions and resources related to water and marine resources

Water withdrawal, including in areas of high-water stress, as well as water recycling and reuse, is tracked annually at the site level across the group to detect deviations from normal operations and increased consumption. Based on the results, corrective or improvement measures are initiated at the site level. These metrics for water recycling and reuse were collected for the first time in fiscal year 2024/25.

As part of our environmental management program, we regularly implement various site-level action plans to reduce our long-term water consumption and increase the security of supply to our plants. In addition to actions aimed at optimizing production processes, the company is increasingly implementing actions to recover water. This happens, for example, at the Wijgmaal site in Belgium, where rice is processed. These actions are primarily, though not exclusively, concentrated on sites in areas experiencing water stress.

The cooperative project to build water fields in Tienen, launched by Raffinerie Tirlemontoise and others together with the Flemish government and a water company in April 2022, provides another example. Here, the aim is to treat the water from the beets produced in sugar production to generate drinking and irrigation water. The storage area is currently being designed. Our long-term target is to close the water cycle in order to reduce the use of groundwater.

### **Targets and metrics**

### E3-3 – Targets related to water and marine resources

The following target was formally adopted in fiscal 2024/25: By 2030, water management plans are to be introduced for all our production sites in areas affected by water risks, including areas of high-water stress, to mitigate water scarcity; the relevant structures are currently being established. No external stakeholders were involved in the preparation of this target.

#### E3-4 – Metrics

Strictly speaking, the difference between the water withdrawn (surface water, groundwater and drinking water from the public supply) and the wastewater discharged and delivered for irrigation or fertilization purposes cannot be truly defined as water consumption, as it continues to be part of the natural water cycle. In fact, the water is released into the atmosphere, for example, through cooling or drying processes, or is contained within the final product itself. The following table outlines the water consumption at Südzucker Group's production plants:

#### Water consumption

Thousands of m <sup>3</sup>	2024/25
Total water consumption	-7,974
Total water consumption in areas at water risk, including areas of high-water stress	-6,897
Total water recycled and reused	273,030
Total water stored <sup>1</sup>	392
Changes in storage	N/A
11. 4. 4	

Includes stored water that is reintroduced into the production process to avoid water abstraction

TABLE 054

Südzucker Group's water consumption figure of −7,974 thousand m<sup>3</sup> reflects the fact that the company returns significantly more water than it extracts, as the raw materials processed at its locations, such as sugar beet, chicory roots and apples, supply a substantial amount of water.

The difference between water withdrawal and water discharge of -6,897 thousand m<sup>3</sup> in areas affected by water risks, including areas with high-water stress, demonstrates that significantly more water was discharged than withdrawn. These are sites that have been identified as material according to IRO 2-E3.

A total of 273,030 thousand m<sup>3</sup> of water was recovered and reused.

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The water withdrawn at the Südzucker Group's sites is typically discharged after being used multiple times in production without being stored. Ponds for storage are available at a few sites, where water obtained during the beet campaign is stored and later used for production purposes. This storage serves to prevent water stress. At the end of fiscal year 2024/25, 392,000 m³ of stored water were within the balance limits of the Südzucker Group. Occasionally, water is also supplied to farmers for irrigation purposes.

Water intensity – water consumption within the Südzucker Group per net sales revenues – is –823 m³/million €.

The data was collected in accordance with this standard for the first time in fiscal year 2024/25.

# **Background information**

About half of the sites identified in the context of negative impact of IRO 2-E3 are located in an area of high water stress or are located in catchment areas whose status was assessed as less than good as part of the implementation of the European Water Framework Directive 2000/60/EC. However, around 1/3 of these sites are small, non-material sites that do not have detailed information on water status. We still intend to conduct individual assessments of these sites and categorize the condition of the relevant catchment areas using available information referred to in the annexes of the Water Framework Directive.

Water withdrawals are primarily based on meter readings and invoice values. In the field of water recycling and reuse, mathematical calculations are increasingly being used alongside meter readings.

The collected data is primarily based on measurements. Extrapolations and estimates are particularly applicable in the field of water recycling and reuse when suitable measuring devices are not available.



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# Environmental information ESRS E5 — Resource use and circular economy

# ESRS 2 SBM-3 – Material impacts, risks and opportunities

Südzucker Group has performed a double materiality assessment in accordance with ESRS 1 to identify material impacts, risks and opportunities (IROs).

Our materiality assessment in the area of "resource use and circular economy" revealed the following material sub-topics: resource inflows, including resource use, resource outflows related to products and services, and waste. The following is a more detailed description of the IROs identified as material for the Südzucker Group together with an explanation of their link to the corporate strategy and business model.

Südzucker Group's business model involves the use of plants and other raw materials of agricultural origin to develop, produce and market food, food ingredients, animal feed, ethanol and other products. Every year, Südzucker Group procures over 30 million tonnes of renewable agricultural raw materials such as sugar beets, grains, chicory and fruit. These are almost entirely processed into high-quality products. This also includes marketing side streams such as molasses, sugar beet pellets, gluten, protein-rich animal feed, flavorings, carbocalk and biogenic carbon dioxide. Group Strategy 2026 PLUS outlines Südzucker Group's goal of sourcing more raw materials, expanding the value chain and further complementing the product portfolio (1-E5).

# Material impacts, risks and opportunities related to resource use and circular economy

Material sub-topics	IRO	Short description	Category	Actual / potential	Value Chain	Origin	Time-horizon
	1-E5	Almost complete utilization of the used agricultural raw materials	Positive impact	Actual	Own operations	Südzucker Group	Short-term Medium-term Long-term
Resources inflows,	2-E5	Use of renewable energy carriers	Positive impact	Actual	Own operations	Südzucker Group	Short-term Medium-term Long-term
including resource use	3-E5	Use of packaging material with a high share of primary raw materials	Negative impact	Actual	Own operations	Sugar division (Südzucker), BENEO, Freiberger, PortionPack, AGRANA	Short-term Medium-term Long-term
Resource outflows related to products and services	4-E5	Providing products to substitute mineral and fossil resources	Positive impact	Actual	Downstream value chain	Südzucker Group	Short-term Medium-term Long-term
Waste	5-E5	Reuse and recycling of waste	Positive impact	Actual	Own operations	Südzucker Group	Short-term Medium-term Long-term

TABLE 055

We are already covering part of Südzucker Group's energy needs with renewable energy in support of our climate targets. This is how the energy potential of wastewater and side streams is used to substitute primary fuels in its own production (2-E5).

Using packaging materials with a high content of primary raw materials results in negative environmental impacts (3-E5). Südzucker Group seeks to minimize these impacts as much as possible. To the extent possible, Südzucker Group opts out of single-use packaging and strives to make the packaging it employs as environmentally sustainable as possible.

In the CropEnergies and starch segments, Südzucker Group produces ethanol as an alternative to fossil fuels. As part of our Group Strategy 2026 PLUS, we plan to expand our product portfolio to include bio-based chemicals that replace fossil resources. This opens up market opportunities for bio-based products in other areas, such as in the transition to a circular economy for bio-based packaging (4-E5).

Given that the raw materials used in Südzucker Group are almost entirely processed, the total amount of waste is very low in relation to the processed raw materials. Most of the waste is already being recycled today (5-E5).



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# Impact, risk and opportunity management

#### E5-1 – Policies related to resource use and circular economy

Südzucker Group has the following policies in place to mitigate negative impacts and further expand positive impacts.

#### Policy of nearly full utilization of raw materials

The primary objective of the policy is to maximize the nearly full utilization of raw materials as a key component of our business model. This is intended to preserve or further enhance the positive contribution to sustainable resource utilization. The implementation of the policy prioritizes the prevention and minimization of waste in accordance with the waste hierarchy. The policy is applied in our own operations.

Südzucker Group's highly diversified business and the associated differences in procured raw materials and product portfolios are the reasons the policy is being implemented at the company level. The companies are supported by Südzucker Group's research and development department. The implementation of the policy is continuously monitored by the management processes for raw materials, waste and products that have been put in place at the plant level.

The policy of using plants and other raw materials of agricultural origin — including the use of side streams — is designed to encourage the use of renewable resources and to move away from primary raw materials. The policy relates to the material IROs 1-E5 and 4-E5.

# Policy of utilizing side streams

The policy of utilizing side-streams by applying all components of the purchased agricultural raw materials is closely linked to the policy of nearly complete utilization of raw materials.

The policy primarily aims to ensure the existing and future use of side streams. This is intended to preserve or further enhance the positive contribution to sustainable resource utilization. The implementation of the policy prioritizes the prevention and minimization of waste in accordance with the waste hierarchy. The policy is applied in our own operations.

We use synergy effects to operate our production plants, especially at the interconnected sites where we operate multiple production plants. In Zeitz and Pischelsdorf, for example, side streams of the wheat starch plants are valorized by processing them into ethanol and animal feed in the ethanol facilities. The energy potential of wastewater streams is also used for biogas production. The biogas produced is utilized in-house to replace primary fuels.

We also rely on innovation to further develop our product streams. One key component is close cooperation with start-ups from the food and circular economy sectors, such as the EIT Food Accelerator Network. Moreover, "Mission KickStart!" is an internal program to accelerate collaboration with startups. This also creates opportunities to develop further synergies in the production process, for example by utilizing side streams.

Südzucker Group's highly diversified business and the associated differences in procured raw materials and product portfolios are the reasons the policy is being implemented at the company level. The companies are supported by Südzucker Group's research and development department. The implementation of the policy is continuously monitored by the management processes for raw materials, waste and products.

The policy of using side streams is aligned with the use of renewable resources and the substitution of primary raw materials. The policy relates to the material IROs 2-E5 and 4-E5.

### Policy of achieving the highest possible utilization rate

Südzucker Group's manufacturing operations focus on avoiding waste and on keeping unavoidable waste in the raw materials cycle. We also endeavor to replace primary raw materials with waste. The general objective is to achieve the highest possible utilization rate for unavoidable waste. This is intended to preserve or further enhance the positive contribution to sustainable resource utilization. The implementation of the policy prioritizes the prevention and minimization of waste in accordance with the waste hierarchy. Otherwise, efforts will be made to channel the waste into reuse or recycling.

The policy of achieving the highest possible utilization rate is applied within our operations and Südzucker Group's highly diversified business and the associated differences in procured raw materials and product portfolios are the reasons it is being implemented at the company level. The implementation of the policy is continuously monitored via the waste management processes put in place at the factory level.

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The policy is focused on moving away from the use of primary raw materials. The policy relates to the material impact 5-E5.

#### Policy of environmentally friendly packaging

During our production, we refrain from using single-use packaging whenever feasible and design our packaging to be as sustainable as possible. The policy aims to enhance the proportion of recycled material or renewable raw materials in packaging and the proportion of recyclable packaging material in the necessary packaging we place on the market, for example when selling small quantities or to end consumers. This should help sustain or enhance the positive contribution to sustainable resource usage and at the same time reduce the current negative impact caused by the use of packaging materials with a high share of primary raw materials. The implementation of the policy prioritizes the prevention and minimization of waste in accordance with the waste hierarchy. Otherwise, efforts will be made to channel the waste into reuse or recycling.

The policy of environmentally friendly packaging is applied within our own operations, and Südzucker Group's highly diversified business and the associated differences in procured raw materials and product portfolios are the reasons it is being implemented at the company level. The continuous monitoring of the concept's implementation is ensured through the management structures for the circular economy area implemented within Südzucker Group.

The policy aligns with the use of renewable resources and the transition away from primary raw materials. The policy relates to the material impact 3-E5.

# Policy for replacing fossil-based products

We are particularly interested in expanding our portfolio in the area of biomass-based products for the non-food sector as a substitute for fossil-based products. To this end, we are researching the further development of biofuel production and biomass-based products, such as those made from sugar, starch, ethanol or carbon dioxide, which can replace fossil products in the market. The main goal of this policy is to facilitate the transition from fossil products to biomass-based alternatives. This is intended to preserve or further enhance the positive contribution to sustainable resource utilization.

The policy for replacing fossil-based products is used in our own operations, developed at the group level and put into action by the companies. By implementing the concept, efforts are made to avoid or minimize waste, or to increase the proportion of waste for reuse or recycling, in accordance with the waste hierarchy. Corporate departments such as research and development or strategy and transformation assist in executing the concept across Südzucker Group.

The policy is focused on the use of renewable resources. The policy relates to the material impact 4-E5.

# E5-2 — Actions and resources related to resource use and circular economy

The materiality assessment pursuant to ESRS 1 revealed that our material impacts related to resource use and circular economy are predominantly positive. In order to maintain these actual positive effects, we have decided to track the utilization rate at group level. For this purpose, an appropriate key figure was developed by the responsible corporate department together with the divisions and integrated into the data collection. This aims to ensure or maintain the highest possible utilization rate.

This key figure will be determined for the first time in fiscal 2024/25 in Südzucker Group's own business unit and will be continuously tracked going forward. The key figure enables monitoring the recycling rate and, if necessary, implementing actions to achieve the target. This action contributes to the policy of achieving the highest possible recycling rate and relates to the material impact 5-E5. An action plan is not required because this is a matter of monitoring progress.

Südzucker Group is implementing actions as part of its environmentally friendly packaging policy to reduce the actual negative impact of IRO 3-E5. The goal is to increase the use of recycled material or renewable raw materials in packaging and the use of recyclable packaging material in the necessary packaging we place on the market, for example when selling small quantities or to end consumers. To this end, the recyclability of packaging materials is to be taken into account.

Regarding the significant impact 3-E5, Freiberger, for instance, has been advocating for the promotion of the circular economy and the conservation of resources since 2018 as part of the "Rethinking Plastic" initiative. This includes the use of recyclable packaging materials that have been successfully tested in the plants and are already partly in use. The initiative aims to systematically separate plastic waste, increase the proportion of recycled materials and reduce the use of plastics. As part of the initiative, Freiberger is also working with research institutions and other Südzucker Group companies on various research projects on plastic substitutes for packaging. In particular, the potential applications of films based on renewable raw materials are being explored.

**COMBINED MANAGEMENT REPORT** 

These actions are carried out by participating in research projects and initiatives and are continuously performed in Südzucker Group's own business sector. No action plan is required, as coordination is achieved through project participation.

No further specific actions are currently being implemented or planned for the policies of nearly complete utilization of the used raw materials pursuant to 1-E5 and 4-E5, the utilization of side streams pursuant to 2-E5 and 4-E5 and the substitution of fossil-based products pursuant to 4-E5. The implemented management processes for raw materials, waste, and products ensure continuous monitoring of the need for further actions.

# **Metrics and targets**

# E5-3 – Targets related to resource use and circular economy

Südzucker Group is committed, as part of its environmental, energy, climate and occupational safety policy, to reducing the resource requirements and environmental impacts of its business activities. This management target is implemented as part of Südzucker Group's environmental management system. The aim is drawn from the strategic priorities, with the designated targets listed below.

#### Targeting a high utilization rate

In line with the policy of achieving the highest possible utilization rate and with regard to the material impact 5-E5, waste disposal must be avoided, and a high utilization rate must be achieved and maintained within Südzucker Group. Starting in fiscal year 2024/25, the utilization rate will be determined as a group-wide measurable target for the company's own activities. This is calculated from the total weight of the non-disposed waste and the total amount of waste generated. <sup>1</sup>

The target is a utilization rate of  $\geq$  90 % for Südzucker Group. This represents an ongoing target that must be achieved and upheld. The utilization rate is tracked annually at the group level. This is a non-binding target.

This goal was established in collaboration with the divisions, taking into account the interests of the stakeholder groups, and approved by the group sustainability board. When developing the program for the circular economy impact area of our "Growing in Balance" sustainability strategy, we conducted an analysis of the relevance and positions of the individual stakeholder groups and integrated it into the standardized framework.

Achieving a high utilization rate is based on scientific findings that show that sustainable management promotes high utilization rates, thereby conserving raw materials and primary energy.<sup>2</sup>

The following table shows the current utilization rate and the target achievement. Measuring progress will take effect from the 2024/25 financial year.

### Utilization rate and target achievement

	2024/25
Utilization rate	94.1 %
Target achievement	100 %

TABLE 056

The target was included for the first time in the 2024/25 Annual Report, and consequently no changes to the target formulation have been made, the corresponding key figure or the underlying measurement method, significant assumptions, restrictions, sources and data collection procedures.

#### Reference to resource inflows and outflows

Our target of a high utilization rate is indirectly related to a circular product design, since the utilization rate also includes recycling. The raw materials Südzucker Group uses are almost entirely processed into high-quality products, resulting in a very low total amount of waste relative to the raw materials processed. Most of the waste is recycled, composted or used for energy. As such, the target promotes increasing the circular material usage rate in terms of the recirculation of materials and components after their first use. The target also has a direct influence on waste management, as the focus is placed on recycling. A high utilization rate also indirectly contributes to the minimization of primary raw materials, as they are retained within the production cycle. Reducing the total amount of waste positively impacts the utilization rate and is preferable to waste recycling. Südzucker Group's approach of nearly complete processing of the raw materials used helps minimize the total amount of waste relative to the processed raw materials, thereby achieving this target, which is unrelated to sustainable procurement and the use of renewable resources. There are no other aspects concerning this target.



<sup>&</sup>lt;sup>1</sup> Total weight of non-disposed waste/total weight of generated waste x 100.

<sup>&</sup>lt;sup>2</sup> Source: Waste Management in Germany 2023, 2023, BMUV.

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### Compliance with the waste hierarchy

Compliance with the waste hierarchy, which prioritizes the waste prevention over its recovery or disposal, is a key component of Südzucker Group's waste management. Our production processes are focused on the efficient use of raw materials and waste prevention. For the waste generated at the plants, the target is to keep these material flows within the material cycle, primarily to recycle them or to utilize their energy potential. The target of a high utilization rate thus encompasses levels 2 (preparation for re-use) 3 (recycling) and 4 (other recovery) of the waste hierarchy.

Cascade principle in waste hierarchy



DIAGRAM 011

No ecological thresholds or company-specific allocations were identified when setting the target.

#### E5-4 – Resource inflows

#### Description of material resource inflows

Südzucker Group's business model is to develop, produce and market high-quality foods, food ingredients, animal feed, ethanol and other products that make use of plants and other raw materials of agricultural origin. The processed agricultural raw materials, such as sugar beets and wheat, are cultivated in temperate climates and largely do not require irrigation. We are able to largely cover fresh water requirements at our sugar factories and fruit juice concentration production plants by using the water contained in the agricultural raw materials. When sourcing packaging materials, the focus is on recycled materials or renewable raw materials. This results in the reference to the material IROs 1-E5 to 5-E5. Critical raw materials, rare earths and fixed assets have been identified as non-material resource inflows.

Materials and products used for production and in the context of services

	2024/25
Total weight of products and technical and biological materials used during the reporting period in tonnes	37,017,407
Percentage of biological materials that is sustainably sourced <sup>1</sup>	89.1 %

<sup>&</sup>lt;sup>1</sup> The data on the procurement of sustainable biological materials was validated by external parties (certification systems).

In fiscal 2024/25, the certification systems REDcert2, RED compliant, SAI/FSA, ISCC-EU, Fair Trade, FSC and BIO, among others, were used to procure sustainable biological materials.

Agricultural raw materials are primarily used in the production processes. As a result, recycled waste is only used in the context of packaging materials. Synergy effects across various societal sectors are leveraged to fully utilize the agricultural raw materials in use. For example, the sugar-containing residues from the sugar factory at the Wanze location are used in the affiliated ethanol factory. Low-quality alcohols from around the world are also purchased at the Ryssen location and used to produce high-quality alcohols.

Recycled materials are primarily used in packaging materials. In terms of product packaging, Südzucker Group opts out of single-use packaging and strives to make the packaging it employs as environmentally sustainable as possible. The majority of our products are already delivered today in bulk or liquid form, e.g., by trucks or rail, without additional packaging. Südzucker Group thus strategically applies the cascade principle ( $\rightarrow$  Diagram: Cascade principle in waste hierarchy) as far as possible to prevent waste.

TABLE 057

Sustainability statement

# Secondary reused or recycled components, secondary intermediary products and secondary materials

	2024/25
Total weight of secondary reused or recycled components, secondary intermediary products and secondary materials in tonnes	182,847
Percentage of secondary reused or recycled components, secondary intermediary products and secondary materials	0.5 %

TABLE 058

#### Methodologies used to calculate the data

Data collection is carried out across all sites on a monthly basis. To ensure data quality, supplier-based information (e.g., invoices) is preferred over the provision of measurement data (primary data). Data is collected based on estimates only if both are not available. In principle, all data used for these reports on resource inflows is recorded as accounting data or measurement data.

The percentage of sustainably sourced biological materials <sup>1</sup> and the percentage of secondary reused or recycled components, secondary intermediary products and secondary materials <sup>2</sup> were calculated. In cases where there were data gaps or data were not available, an estimate of the data was carried out using past years' data or experiential values as a basis.

In fiscal 2024/25, a significant data estimate was carried concerning secondary resource inflows due to the absence of weight information on packaging materials. Data was conservatively estimated based on supplier information and the experience of the responsible purchasing department for each type of packaging.

#### E5-5 – Resource outflows

#### Description of material resource outflows

Südzucker Group's strategy is to make full use of the raw materials employed, which helps in reducing waste generation as a whole. The predominant part of the unavoidable waste is recycled, composted or utilized for energy recovery, which is evident in the high utilization rate. For the purpose of ensuring proper waste management, waste management policies are implemented at the local level throughout the group and annual balances of the waste generated are compiled.

Südzucker Group's products are primarily composed of agricultural plant and animal raw materials used as food and animal feed. There is no design with regard to durability, reusability, repairability, disassembly, remanufacturing, refurbishment, recycling, recirculation by the biological cycle or optimization of the use of the product or material through other circular business models.

The expected durability refers to a product's ability to remain functional and relevant when used as intended, considering both the product's lifespan and its longevity. The focus in the design of relevant products is on maintenance (repairability) to promote longer use in practice and on the respective scale than is intended as standard, without compromising circular treatment at the end of life. Südzucker Group products mainly consist of food and feed, which are not repairable. Since they are consumed, a lifecycle-related treatment at the end of their lifespan is neither possible nor necessary. Therefore, only the recyclability of the packaging materials is considered relevant and examined below.

Recyclab	ole co	ontent	in	pac	kagi	ng
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	2024/25
Rate of recyclable content in the packaging material used	89.9 %

TABLE 059

### Waste composition

The waste streams relevant to Südzucker Group are confined to organic waste, packaging materials, and construction and demolition waste, due to the primary processing of plant and animal raw materials from agriculture. The main waste components in production are food waste or other biomass waste. Wood, paper, cardboard, plastic, metals, and glass are the main components of packaging materials. Demolition or construction activities primarily generate waste materials such as soil, concrete, bricks, wood, glass, metals, plastics, gypsum and asbestos.

¹ Total weight of renewable resource inflows from sustainable procurement/Total weight of resource inflows x 100.

<sup>&</sup>lt;sup>2</sup> Total weight of secondary resource inflows / Total weight of resource inflows x 100.

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#### Waste generation Tonnes 2024/25 Total amount of waste generated 981,019 Total amount by weight diverted from disposal 922,935 Hazardous waste, diverted from disposal 2,149 thereof hazardous waste that was prepared for reuse 60.6 thereof hazardous waste, that was sent for recycling 1,730 thereof hazardous waste, that sent for other recovery operations 358 Non-hazardous waste, diverted from disposal 920,786 thereof non-hazardous waste that was prepared for reuse 11,532 thereof non-hazardous waste, that was sent for recycling 889,395 thereof non-hazardous waste, that sent for other recovery operations 19,858 The amount by weight directed to disposal 58,084 Hazardous waste, directed to disposal 1,805 thereof hazardous waste for incineration 1,186 411 thereof hazardous waste zur landfilling thereof hazardous waste for other disposal operations 209 Non-hazardous waste, directed to disposal 56,279 2,659 thereof non-hazardous waste for incineration thereof non-hazardous waste zur landfilling 32,244 21,375 thereof non-hazardous waste for other disposal operations Total amount of non-recycled waste 89,893 Percentage of non-recycled waste 9.16 %

#### Hazardous waste and radioactive waste

Tonnes	2024/25
Total amount of hazardous waste	3,954.0
Total amount of radioactive waste	0.0

TABLE 061

#### Methodologies used to calculate the data

All data used for these reports on resource outflows were primarily recorded as accounting data or measurement data.

In fiscal 2024/25, a significant data estimate was made for the recyclable share of the packaging materials. The data was estimated for the Südzucker Group – excluding AGRANA – based on supplier information.

In the context of waste data collection, a decision was made regarding thresholds that for locations connected to the public waste disposal system and not using other waste disposal services during the reporting period (FY 2024/25), no data entry is required. This decision is based on the fact that the involved sites (for example, administrative-only sites) do not receive site-specific quantity information from the waste disposal company through public waste collection, and it would be disproportionate to weigh the waste due to the minimal volumes involved. Moreover, the waste generated at these sites is not material compared to the total waste of Südzucker Group.

TABLE 060

# Social information ESRS S1 – Own workforce

People from diverse backgrounds and cultures collaborate closely at our globally active group of companies. We focus on their individual skills and talents. Every day, we strive to cultivate a climate of mutual trust within our group of companies, as well as a work environment free from all forms of prejudice and discrimination, where everyone is accepted equally and can contribute their talents, knowledge, experience and opinions. Südzucker Group's values – responsibility, creativity, appreciation and cooperation - are designed to contribute to achieving our overarching goal: to harness more strength from the group.

# ESRS 2 SBM-3 – Material impacts, risks and opportunities

Südzucker Group has performed a double materiality assessment in accordance with ESRS 1 to identify material impacts, risks and opportunities (IROs).

Our materiality assessment in relation to "own workforce" revealed the following key subtopics: Working conditions, as well as equal treatment and opportunities for all. The following is a more detailed description of the IROs identified as material to Südzucker Group's own workforce, along with an explanation of their link to the corporate strategy and business model.

Our business model involves the use of plants and other raw materials of agricultural origin to develop, produce and market high-quality food, food ingredients, animal feed, ethanol and other products. As a result, the company is dependent on a

# Material impacts, risks and opportunities (IROs) related to our own workforce

Material sub-topics	IRO	Short description	Category	Actual/ potential	Value chain	Origin	Time-horizon
	1-S1	Adverse effects on the health of employees due to hazards	Negative impact	Actual	Own operations	Südzucker Group	Short-term Medium-term Long-term
	2-S1	Good working conditions for employees, such as secure employment, regulated working hours, adequate wages and social dialog	Positive impact	Actual	Own operations	Group companies with collective bargaining agreements	Short-term Medium-term
Working conditions	3-S1	Good work-life balance, particularly due to reliable working hours and other country-specific regulations	Positive impact	Actual	Own operations	Südzucker Group	Short-term Medium-term
	4-S1	Adverse effects on the health of employees due to workload demands	Negative impact	Potential	Own operations	Südzucker Group	Short-term
	5-S1	Business interruption due to labor disruption	Risk	=	Own operations	Südzucker Group	Medium-term Long-term
	6-S1	Shortage of skilled workers	Risk	_	Own operations	Südzucker Group, Sites in Europe	Medium-term Long-term
	7-S1	Loss of know-how due to employee turnover	Risk	=	Own operations	Südzucker Group	Medium-term Long-term
	8-S1	Development opportunities for employees	Positive impact	Actual	Own operations	Südzucker Group	Short-term Medium-term Long-term
Equal treatment and opportunities for all	9-S1	Underrepresentation of women, especially in management and production	Negative impact	Actual	Own operations	Südzucker Group	Short-term Medium-term
		Instances of inappropriate behavior	Negative impact	Potential	Own operations	Südzucker Group	Short-term Medium-term

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suitable workforce, particularly in the production sector. Moreover, employees at our facilities could be exposed to negative repercussions. With this in mind, our corporate strategy, particularly the HR strategy, endeavors to minimize the negative impacts and risks concerning our own workforce and to further enhance the existing positive impacts. Our HR strategy specifically targets ways to multiply these positive effects.

Südzucker Group is a manufacturing company that operates process plants and technical equipment in addition to the corresponding administrative processes. In this context, there are hazards that can lead to injuries or occupational diseases for employees. Despite all measures and controls in place to ensure occupational safety and health protection, not every work-related accident or illness can be prevented. Unfortunately, there were also accidents in our company in fiscal 2024/25 that had adverse effects on the health of the affected employees (1-S1). In line with our corporate responsibility, we therefore aim to reduce the accident rate for the entire group; we also strive to consistently enhance our safety culture. This contributes to the impact area of "Safe operations" within our "Growing in Balance" sustainability strategy.

Due to Südzucker Group's strong focus on production and technology, male employees still account for a significantly higher proportion of the workforce in almost all segments. There is still an underrepresentation of women in senior management positions and in production within Südzucker Group (9-S1). As a signatory of the Diversity Charter, we have committed ourselves to promoting diversity and inclusion, making it one of the areas of action of our HR strategy. We aim to foster an inclusive environment where every employee feels welcome and appreciated. In spite of all

measures we have implemented, we cannot completely eliminate the possibility of inappropriate behavior among our nearly 20,000 employees worldwide. This includes sexual harassment and other types of harassment such as bullying and insults (10-S1). However, due to a partial lack of transparency regarding actual overtime worked, particularly at our locations outside Europe, we cannot exclude potential adverse effects on employees' health due to workload demands. This results from the overall workload and the individual requirements, including the respective personal coping strategies (4-S1).

As a company operating in the sugar industry, we are largely subject to collective bargaining agreements in Germany and other European countries. Consequently, most employees of Südzucker Group have an employment contract bound by a collective agreement, which ensures a secure employment and fair wages and regulates working hours. Furthermore, the social dialogue at company, corporate and European levels is intended to ensure appropriate working conditions in the future as well. This is due to the fact that important co-determination factors such as organizational changes, structural or cost-efficiency programs are generally coordinated and decided on with the works council committees (2-S1). With the corresponding agreements on reliable and in some cases flexible working hours, we also provide our employees a basis for achieving a work-life balance as part of our HR strategy (3-S1). To increase employee retention, we are continually expanding the range of group-wide and divisionspecific learning opportunities and development initiatives as part of our HR strategy. These development and qualification opportunities strengthen the skills and satisfaction of our employees (8-S1).

Risks arise from the dependence on our own workforce and, in part, from the negative impacts. Südzucker Group competes intensely with other companies for qualified personnel and is therefore exposed to medium and long-term risk of being unable to adequately fill vacancies as planned due to the shortage of skilled workers. This applies particularly to our locations in Europe (6-S1). Additionally, employee turnover carries the risk of loss of know-how (7-S1). If new agreements with the works councils and trade unions cannot be concluded on acceptable terms following the termination of existing collective bargaining agreements, strikes, work stoppages or similar labor dispute action may follow, which would have a negative impact on Südzucker Group (5-S1).

In  $\rightarrow$  section "S1-4 – Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities and effectiveness of those actions", we report on what we are doing to mitigate the negative effects, strengthen the positive effects and minimize the risks. The framework for these measures across the group is formed by our HR strategy, which covers various fields of action. This includes, among other things, the work environment, incentive systems, leadership, as well as diversity, equal opportunities and inclusion. In our HR strategy, we have committed to designing attractive workplaces and fostering diversity, inclusion, participation and the individual development of our employees. Due to country-specific regulations and legislation in the personnel sector, the actions generally do not apply to the entire group. Instead, they are tailored to the specific company or country. We continually strive to develop and expand these actions. Our HR strategy, along with the occupational safety policy, is closely tied to our "Growing in Balance" sustainability strategy. Here, the topics are particularly reflected in the impact areas "Attractive workplace" and "Safe operations".

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#### Affected own workforce

Südzucker Group is linked to various types of own workforce who may be affected by the material impacts outlined above. Our company employs both permanent and temporary employees, and also hires temporary external workers in accordance with applicable legal regulations. During periods of higher labor demand, such as the processing of agricultural raw materials in the harvest season, we meet this demand by hiring seasonal workers as well as temporary workers. In some company areas, temporary workers are deployed in production throughout the year to the extent permitted by law. We also utilize freelancers for clearly defined tasks, such as in the context of projects. According to our definition, external workers include workers hired out through third parties as well as freelancers.

Generally, our entire workforce, including external workers, may be affected by material negative impacts (1-S1, 4-S1, 10-S1).

For material positive impacts (2-S1, 3-S1, 8-S1), the focus is on employees who have an employment relationship with Südzucker Group (employees). This also applies to the underrepresentation of women in management and production (9-S1).

With the exception of the underrepresentation of women in management and production (9-S1), which is more systemic in nature, the significant negative impacts are associated with individual incidents (1-S1, 4-S1 and 10-S1). We have not identified any significant risk concerning forced labor or child labor due to our activities.

The material positive impacts identified particularly affect employees with collective bargaining agreements, who comprise the majority of Südzucker Group employees (2-S1) and all employees (3-S1 and 8-S1).

We link the positive impacts we have identified to good working conditions, including a sense of security, reliable working hours, fair wages, opportunities for a good work-life balance and personal development, as well as effective leadership. Furthermore, we promote social dialogue. We are committed to collective bargaining to continue ensuring good working conditions. We believe it is important to respect the freedom of association of our workforce, enabling them to represent their interests in a self-determined manner. Thus, we are in regular negotiations with the trade unions in the countries where we are mainly represented (Germany, Belgium, Poland, France, Austria).

Our group-wide climate roadmap to achieve the 2030 climate targets includes a series of CAPEX and OPEX actions at existing production sites. We are not aware of any negative impacts on our own workforce for the fiscal year 2024/25 that could result from this plan.

In the fiscal year 2024/25, we have proactively reached a company agreement in Germany, committing to creating jobs for new employees, further qualifying existing employees and refraining from dismissing any employees during the transition to a climate-neutral production process.

Within the framework of the materiality analysis, we analyzed whether there are specific groups of people who are more vulnerable to certain impacts. The negative impact regarding workload potentially affects primarily older workers, female workers and workers with disabilities in particular (4-S1). Both negative impacts under the sub-topic "Equal treatment and opportunities for all" primarily affect female workers (9-S1 and 10-S1) as well as individuals of the third gender (diverse) and transgender people (10-S1).

Depending on the field of activity, the occupational hazards that can impair employees' health vary. For instance, the risks in administrative sectors differ from those found in production or maintenance.

The financial risks that we identified for Südzucker Group in the materiality assessment (5-S1, 6-S1 and 7-S1) do not stem from the impact on specific groups of Südzucker's own workforce.

# Impact, risk and opportunity management

#### S1-1 – Policies related to own workforce

Südzucker Group has developed policies and guidelines to mitigate actual and potential negative impacts, enhance positive effects and minimize risks. With regard to human-rights-related obligations, the code of conduct, the general HR policies and the anti-discrimination policy refer to relevant, internationally recognized instruments such as the conventions of the International Labor Organization.



#### Code of conduct

TO OUR SHAREHOLDERS

The basis for Südzucker Group's interaction with employees and for the employees' behavior towards each other and towards external persons is the company's code of conduct. The objective is to support the own workforce in their daily work and, in particular, in critical situations, in acting responsibly, appropriately and in compliance with the law. Our code of conduct combines applicable laws with international standards, company regulations, corporate policies and obligations arising from the employment relationship with Südzucker Group companies. All executives and employees, including external workers, must adhere to these guidelines and principles. This applies with the exception of AGRANA, which, as a publicly listed company, has its own code of conduct that takes into account the contents of Südzucker Group's code of conduct.

Our code of conduct addresses all the material impacts and risks listed in the table above. It sets out clear directives on the following topics, among others: health and occupational safety (1-S1), adequate wages (2-S1), social dialogue (2-S1), freedom of association and the right to collective bargaining (2-S1), diversity and the principle of equal treatment (9-S1 and 10-S1), as well as good work-life balance (3-S1). The executive board is responsible for overseeing the implementation.

We express our clear commitment to responsible behavior and human rights in the code of conduct. Among other conditions, it specifies that we do not tolerate any form of child or forced labor. The action mentioned in the code of conduct to provide remedies in the event of negative impacts on human rights is the mechanism for reporting, identifying, documenting and investigating concerns about illegal behavior or conduct that conflicts with our code of conduct (—) ESRS G1 Business conduct/Whistleblower system). No direct consultation of the company's workforce was conducted during the revision of the 2024/25 code of conduct.

The code of conduct was updated in the fiscal year 2024/25. The range of topics remained the same. However, the obligations were specified, and the communication channels for reporting were emphasized.

The Group functions responsible for its sub-areas are accountable for the implementation of the code of conduct. Our code of conduct is available on the company website and on the intranet. The revised version will also be communicated to our workforce through various channels.

#### General HR policy

Furthermore, Südzucker Group developed and adopted a general HR policy in the fiscal year 2024/25. It covers employees and will apply group-wide from the fiscal year 2025/26.

The objective of the general HR policy is to create a mandatory framework for HR topics for Südzucker Group. Within this policy, we are committed:

- to ensuring equal opportunities regardless of age, gender, origin or other characteristics and to promoting a diverse working environment,
- to providing a safe and healthy working environment that supports both physical and mental health,
- to fostering a company culture rooted in responsibility, creativity and teamwork, where executives are meant to serve as role models,
- to investing in the continuous training of our employees and to promoting their personal and professional development,
- to offering a fair and competitive compensation to attract and retain suitable employees over the long term,

- to assuring the right of employees to organize and collectively represent their interests,
- to the protection of employees' personal data
- and to ethical behavior.

Accordingly, this policy also covers all major impacts and risks listed in the "Material impacts, risks and opportunities (IROs) related to our own workforce" table, with a particular focus on the IROs pertaining to working conditions (1-S1, 2-S1, 5-S1 to 8-S1), and serves as the foundation for devising additional actions. The monitoring of the implementation is carried out by the Labor Director of Südzucker AG, who is simultaneously the CEO. For topics with interfaces to the sustainability strategy, he is supported by the group sustainability board.

The policy was drafted with the involvement of representatives of the divisional HR departments as representatives of the "own workforce" stakeholder group. Responsibility for the implementation of the policy lies with the HR corporate department. The policy will be published on the intranet.

In fiscal year 2024/25, further group-wide policies were issued on the following topics:

- Recruiting & Onboarding
- Compensation & Benefits
- Leadership & Culture
- Training & Progress
- Diversity, Equal Opportunity & Inclusion
- Working hours/Overtime including mobile work

These policies are intended to provide an additional framework for specific topics, to substantiate the provisions of the general HR policy and, in particular, to address 2-4-S1 and 8-10-S1. They will also apply company-wide for employees starting from the

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2025/26 fiscal year. The policies were drafted with the involvement of representatives of the divisional HR departments as representatives of the "own workforce" stakeholder group.

As of the reporting date, the required processes for enacting and overseeing the policies, along with the related responsibilities, had not yet been put into place. We will publish the policies on the intranet.

#### Policy for workplace accident prevention

Occupational health and safety is a high priority throughout Südzucker Group. In 2024, we updated our group-wide environmental, energy, climate and occupational safety policy from 2021. It covers all employees and is accessible on the intranet. Südzucker Group commits to ensuring safe production facilities and working conditions and to cultivating a safety culture that proactively promotes safe behavior and values the health and safety of people. This policy is particularly aimed at addressing the material occupational health and safety-related impact (1-S1). No consultation with the own workforce was conducted during the revision of the policy, nor were any internationally recognized instruments included. The executive board is responsible for overseeing the implementation. For topics with interfaces to the sustainability strategy, it is supported by the group sustainability board.

The corporate department climate, environment and health & safety is responsible for implementing the policy for the prevention of workplace accidents. The importance of this topic is also underscored by the fact that occupational safety is one of the eight focus areas in the group-wide sustainability strategy.

Our goal is to reduce the accident rate, and we have drawn up a corresponding program of actions ( $\rightarrow$  S1-4 – Actions related to material impacts, approaches to managing material risks and pursuing material opportunities and effectiveness of these actions). Risks in occupational safety and plant security are regularly identified and assessed, the development of skills for managers, experts and employees is promoted, the achievement of objectives is systematically reviewed and the effectiveness of the established actions is evaluated. Certified occupational health and safety management systems according to ISO 45001 are implemented at six production locations, five of which are in Germany and Austria and one of which is in Mexico.

The topic of occupational safety is also raised in the code of conduct and in the general HR directive.

#### Anti-discrimination policies

Our policies (code of conduct, general HR policy and policy on the topic of diversity, equal opportunities and inclusion) enshrine the principle of equal treatment, the promotion of diversity, equal opportunities and inclusion, and the prohibition of discrimination (including harassment). Südzucker AG, representing the entire Südzucker Group, has also publicly committed itself to promoting diversity, equal opportunities and inclusion as a signatory of the Diversity Charter. There are no specific obligations across the group regarding inclusion or support actions for particularly vulnerable groups, aside from adhering to the respective national laws.

The group-wide policy on "diversity, equal opportunities and inclusion", effective from fiscal year 2025/26 specifies possible reasons for discrimination, such as age, disability, gender, gender

identity, sexual orientation, ethnic origin (including skin color, nationality, ethnic or national descent), religion, political opinion or social origin, as well as possible forms of discrimination based on other personal characteristics.

As part of a group-wide initiative in 2021, a cross-divisional working group, led by a diversity and inclusion officer at the corporate level, aligned the principles of equality, openness, respect and empathy and anchored them in a group-wide mission statement. These principles form the foundation of our actions and commit us to a discrimination-free coexistence.

The implementation of the "diversity, equal opportunities and inclusion" policy and the mission statement is the responsibility of the corporate HR department. The monitoring of the implementation is carried out by the Labor Director of Südzucker AG, who is also the CEO. For topics with interfaces to the sustainability strategy, he is supported by the group sustainability board.

Both the policy and the mission statement are available on the intranet.

Our ambassador network was established to specifically reinforce our principles and to help strengthen international networking in the area of diversity and inclusion. Comprising employees from various Südzucker Group locations, the team serves as a local point of contact, supporting those affected and acting as a liaison between the workforce and management.

Another initiative involves the creation of a global job architecture that will ensure transparency and fairness in salary classification, job allocation and promotion by clearly defining the roles and



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responsibilities associated with each position. We are also in the process of introducing a new compensation system for non-tariff employees that is based on the internationally recognized benchmarks of Korn Ferry, a leading provider of compensation analysis. This allows us to align our compensation with the market while appropriately honoring the performance of our employees, in conjunction with the collective agreements we apply in the group companies where we are bound by such agreements. In the countries where we operate and where it is a legal requirement, we also have representatives for severely disabled individuals who provide specific support and ensure that the needs of employees with disabilities are appropriately considered. Südzucker AG's job postings also encourage all candidates to apply, irrespective of their gender, nationality, religious or social background, sexual orientation or identity, origin or physical or mental abilities. Furthermore, we have been conducting unconscious bias workshops for managers since 2023 to uncover and question unconscious prejudices. Complaints about discrimination, including harassment, can be reported, among other things, via the Südzucker compliance line (→ S1-17 – Incidents, complaints and severe human rights impacts and ESRS G1 - Business conduct). Additional information can also be found in the  $\rightarrow$  section "Actions" relating to material negative impacts" in this chapter.

# S1-2 – Processes for engaging with own workers and workers' representatives about impacts

We integrate the views of our workforce into our decisions to handle the actual and potential effects, both directly and indirectly, through employee representatives. The focus is on employees.

Südzucker Group is committed to open communication with its employees. Employees can stay informed group-wide about developments in the company, including major initiatives for dealing with the main impacts and, in some cases, address questions or provide feedback via a quarterly magazine, town hall meetings (three times a year), monthly newsletter, video messages on specific occasions and continuously on the intranet. In fiscal year 2024/25, the main focuses included working conditions and compensation policy, diversity and inclusion, and fulfilling human rights-related due diligence responsibilities.

In order to better incorporate employee perspectives in the company's development, employee surveys are conducted at irregular intervals. In the fiscal year 2024/25, this was, for example, the survey on satisfaction with the internal IT within the group. Furthermore, the idea management tool recorded 826 suggestions from employees across various divisions in Germany aimed at improving workflows or workplaces in the calendar year 2024. The originators of the ideas are sent a letter informing them about the assessment of their particular idea and if a reward payment has been decided.

We also involve our employees directly in the development of new approaches. For example, we conducted workshops with enthusiastic employees in Germany, France and Poland to co-develop leadership principles for our company. The outcomes of the workshops were recorded and distributed to the attendees. In the context of the group-wide initiative "Young Professionals", initiated in February 2024, selected young professionals from the technical area are working on targeted projects. Participants are expected to receive regular feedback on their ideas and approaches, along with the necessary support, through networking with Südzucker Group's group operations leadership team.

Our code of conduct and general HR policy clearly state our commitment to freedom of association. This allows our employees to organize freely to advocate jointly for their interests and includes the right to join labor unions, conduct collective bargaining and organize strikes.

Works councils, elected by employees, are established at almost all of our major locations in Germany, Belgium, Poland, Austria and France, in accordance with the respective national laws. The works councils at the sites meet at regular intervals, usually every two to four weeks. These works councils are consolidated in a central works council. It convenes twice a year, with extraordinary meetings as needed. Once a year, all works councils from the various locations meet at a plenary meeting of the works council. A European Works Council has been established at the group level, which meets annually and promotes the exchange of information on cross-border issues.

Delegates of the employee representation at the operational, corporate and European level are informed by the CEO in his role as labor director, among others, in regular work meetings. Key co-determination issues such as organizational changes, structural or cost efficiency programs are generally decided by consensus. Company agreements cover issues such as occupational safety requirements, shift work, flexible working hours and employee training.

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At meetings and conventions, there is also an opportunity to discuss climate protection with our employees. That includes explaining what our emissions reduction actions mean for the company and our employees. The exchange of ideas on these matters and other sustainability topics was a focal point of the annual plenary meeting of the works council in June 2024. In July 2024, we concluded a company agreement in Germany, committing to creating jobs for new employees, further qualifying existing employees and refraining from dismissing any employees during the transition to a climate-neutral production process.

There is no global framework agreement between Südzucker Group and employee representatives in connection with respect for human rights. Nevertheless, we also incorporate the perspective of our employees, both directly and indirectly, on this issue. We have, for example, maintained an exchange with representatives of the works council at the annual meeting of the supervisory board's strategy and sustainability committee and at the annual plenary meeting of the works council. Information that we receive through human rights-related reports from our employees is also included.

To gain insights into the perspectives of our workforce who are particularly vulnerable to impacts and/or could be marginalized, we have various initiatives and formats. For example, we gain such insights via the ambassador network focused on diversity and inclusion, the ongoing women's mentoring program or the "Pride at Work Community", which was established in the 2024/25 financial year. In Germany, there is a representative body for severely disabled employees that advocates for the interests of employees with disabilities.

The corporate department of internal communication is responsible for the communication policy directed at employees, while the corporate department of human resources is responsible for

involving employees. In his role as labor director, the CEO is the primary point of contact for all matters relating to employee representation. He attends the yearly meetings of the European Works Council. No financial resources are allocated for the involvement of employees. The effectiveness of our cooperation with employees is reflected, by way of example, in the agreements reached during the reporting year, including those on the compensation of non-tariff employees and on partial retirement — applicable to Südzucker AG, BENEO and CropEnergies in Germany. This ensures employees are informed about their contributions to a decision.

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

Workers — including third-party workers — have various channels to communicate concerns, complaints or grievances, such as HR managers, works councils/equal opportunities officers or anti-bullying officers. Alternatively, they can address their concerns in town hall meetings.

Most importantly, our confidential whistleblower system, which can be used anonymously if desired, is accessible (chapter "Business conduct"). This enables affected individuals or observers – including employee representatives – to confidentially report potential cases, even in connection with employee matters. Reports can also be made via a specially designated phone number, an email address or by mail. Südzucker Group's reporting channel, the Südzucker compliance line, is operated by an external provider.

Südzucker Group's grievance mechanism and a detailed description of how to handle information are published on our company website and accessible to everyone. We also draw attention to the various reporting channels in the code of conduct a during compliance training, among other aspects. The reporting channel,

Südzucker compliance line, is accessible in seven languages: German, English, French, Dutch, Polish, Romanian and Spanish. Further specific actions to support the availability of the grievance mechanism directly at the workplace of our own workforce have not yet been implemented.

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All submitted information will be carefully checked and processed as part of the whistleblower procedure. The corporate HR function is involved in clarifying and addressing issues related to employee matters. In the fiscal 2024/25, 10 cases related to discrimination were reported (→ S1-17 Incidents, complaints and severe human rights impacts). When the examination of the situation reveals that the notice is justified, Südzucker Group takes appropriate prevention and/or remedial measures. Remedial actions are defined specifically for each individual case. If a violation can be traced back to individual employees, employment law measures may ensue. The effectiveness of the remedial actions is not systematically assessed. The process for dealing with complaints, including those related to employee matters, is outlined in more detail in the → chapter "Business conduct", together with an indication of how the effectiveness of the system is evaluated. The remedial measures taken in fiscal 2024/25 are outlined in S1-4 – Actions related to material impacts, approaches to managing material risks and pursuing material opportunities and effectiveness of these actions.

The primary principle of our whistleblower system is the protection of the whistleblower in accordance with the applicable law transposing Directive (EU) 2019/1937 and in line with local whistleblower protection laws. Whistleblowers who report in good faith will not be subjected to any kind of disadvantage. In cases where the report is submitted anonymously, personal details will not be sought at any stage of the procedure (additional details can be found in the "Business conduct" chapter). This is documented in the policy for the whistleblower system of Südzucker AG as the

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parent company. It has not yet been studied to what extent our own workforce is familiar with and has confidence in the whistle-blower protection process. The policy on protection of individuals, including workers' representatives, against retaliation is outlined in the "Business conduct" chapter.

# S1-4 – Actions related to material impacts, approaches to mitigating material risks and pursuing material opportunities and effectiveness of those actions

#### Actions related to material negative impacts

Through the actions described below, we aim to prevent, mitigate and improve any negative impacts on our workforce, while enhancing positive effects. We assess the effectiveness of the implemented actions by examining the progression of the gathered group-wide metrics. For some of the actions described, we have additional methods to assess effectiveness.

We have created a global HR organization tasked with executing the strategic targets. This team comprises the HR managers of the divisions and the corporate HR function lead. Other international teams have also been set up for the main topics: Recruitment, employee development, leadership, in addition to digitalization, data and processes. A cross-divisional working group of occupational safety experts is also in place to promote the topic within the group.

# **Working conditions**

We have identified the following material negative impacts in relation to working conditions: "Adverse effects on the health of employees due to hazards" (1-S1) and "Adverse effects on the health of employees due to workload demands" (4-S1).

With respect to 1-S1, we have taken the following protective and preventive measures in line with our occupational safety target:

- In 2024, we established a group-wide health and safety action plan outlining key actions to further improve occupational safety for our own workforce and to further develop the safety culture at Südzucker Group. These actions are generally implemented at the site level. In the 2024/25 financial year, for example, we held workshops and seminars on safety culture, safety days, training on machine safety and management training.
- We are continuously training our own workforce about risks and protective measures, making technical improvements to our facilities and marking traffic routes to increase safety at Südzucker Group locations.
- Workplace accidents and so-called "near misses" are shared within Südzucker Group through accident reports and "lessons learned newsletters" to sensitize our own workforce to these issues. In the event of serious accidents and incidents with a high hazard potential, a "Safety Flash" is also prepared and distributed in a timely manner to provide information about particular risks at short notice and to draw lessons from them.

- Südzucker Group honors accident-free factories as part of its annual occupational safety competition, which will also take place in the 2024/25 financial year. This action also raises awareness of occupational safety issues, particularly among the group's employees.
- A Health & Safety Booklet was also created in 2024, providing all the important information on the topic of occupational safety. It is to be made available to the employees of Südzucker Group and continuously developed. We are currently setting up a process for this. By implementing these steps, we support the enhancement of important knowledge among the employees of Südzucker Group.
- We also kicked off a long-term, group-wide safety campaign in 2024 titled "Safety First – Because You Matter", directed at Südzucker Group's workforce. Monthly, a central theme on different facets of job safety is presented to sensitize people to the topic.

The actions listed above are part of the existing management systems for occupational safety and health protection and are thus generally designed to be ongoing. Continuous communicative actions are employed and refined to uphold and advance a robust safety culture. Moreover, occupational safety services require consistent assessment and enhancement.

Our fire department is available for rescue operations in the event of actual injuries or accidents at some of our factories. For all other instances, help is provided by public rescue forces, with emergency plans in place for their deployment.



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Remedial action was taken for the workers affected by occupational accidents in the financial year 2024/25 as part of the services provided by the respective accident insurance companies. Additional psychological support is provided as needed to deal with traumatic events.

There are further offers to achieve positive effects on one's own workforce. Südzucker Group offers site-specific and continuous individual preventive measures to protect physical and mental health at its locations as part of its company health management, such as preventive measures (back exercises, yoga, health days, nutrition and non-smoking courses, cooperation with gym facilities, participation in running events) or reintegration measures after long-term absence. The seminars and training courses are designed to raise employees' awareness of the importance of maintaining a healthy balance between their professional and personal daily lives. We also provide these programs online. These offers are particularly targeted at employees.

Our target is to lower the accident rate across the entire group. We assess the effectiveness of the actions taken by means of a suitably defined key figure. Furthermore, the statistical development of accidents in our company, safety tours at the locations and the findings from internal and external audits serve to evaluate the effectiveness of the actions.

We regularly perform hazard evaluations to identify risks early on and establish which actions are needed and appropriate. A key aspect is the implementation of an incident management system in 2024, facilitating group-wide exchange and learning from accidents and "near misses". We allocate human resources, including security experts at the locations, to implement the actions.

We have taken the following protective and preventive measures with regard to workload related to 4-S1:

- In our newly developed, group-wide valid guideline "Policy on working hours" for fiscal year 2024/25, we have recommended flexible working hours. Offering permanent flexibility in working hours for employees in the commercial sector is intended to help establish a work environment that caters to the employees' needs. In principle, the option to work flexible hours should be available at all times, provided that there are no operational reasons (e.g. significant impairment of operations) that would preclude it.
- Südzucker, BENEO and CropEnergies employees in Germany can anonymously access a range of services through the family service, including help with life coaching. These offers are announced both within the onboarding process and on the intranet. These offerings are designed to be permanent and, depending on when the employee accepts them, can also serve as a remedial measure.
- Employees who are older or have disabilities are a notably vulnerable group regarding workload demands. Employees who belong to this group and are paid according to a collective bargaining agreement thus receive more vacation so that they can plan for periods of recovery. We also occasionally set up partial retirement programs in Germany that allow older employees to retire earlier.

We also have other actions in place to positively impact our employees as part of our occupational health management, as described earlier in this section.

The development of the turnover rate figure (turnover ratio) helps us assess the effectiveness of our actions. The HR officers in the respective country or division typically determine the necessary actions as part of the existing management processes. Since 4-S1 is not an actual material impact, corrective action is not relevant.

#### Equal treatment and opportunities for all

We identified the "underrepresentation of women, especially in management and production" (9-S1) and "instances of inappropriate behavior" (10-S1) as negative effects in this area.

With respect to 9-S1, the following actions are being taken to mitigate the underrepresentation of women in our company, identified as an actual impact:

- By implementing our continuous "Empowering Women" program started in 2020, we seek to fortify and better network women in the professional sphere throughout Südzucker Group. The program is aimed at female employees who want to develop into leadership or expert roles. The resulting "Empowering You" format also includes men in the content to jointly develop policies and ideas to promote gender equality in the company.
- The "Empowering Women" program has evolved into the "Empowering Women Community", a women's network aimed at supporting women within and outside the network in their career paths within Südzucker Group. In addition to the corporate department Digital & IT, there is the "Women in Tech" network, providing a platform for women in technology roles within our organization.

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- Since 2023, our ongoing mentoring program has provided the female employees of Südzucker Group with individual support through connections with experienced colleagues. We strive to strengthen the professional and personal development of participating women, cooperation and the exchange of knowledge as well as a positive corporate culture.
- In October 2024, Südzucker Group made its debut at the career fair "herCareer" to specifically reach out to female candidates in the job market.

Except for the last action, these are ongoing initiatives intended to continue in the coming years. In addition, as a preventive measure for fiscal year 2024/25, we regularly raised awareness among Südzucker Group employees on the topic of diversity and inclusion, particularly through communication initiatives and targeted actions (e.g., on German Diversity Day or International Women's Day). There are no additional actions to bring about positive effects on the employees.

The actions described above were generally designed and coordinated by a cross-divisional working group under the leadership of the corporate HR function, in order to achieve our group-wide target of increasing the proportion of women in the first and second management levels below the executive board to 25 % by 2027 (→ section "Objectives and key figures"). With the relevant metric, we can assess the effectiveness of the actions. In fiscal 2024/25, the proportion of women in the two management levels was 19 %.

With regard to 10-S1, training courses, in particular, are conducted as a permanent preventive measure. To increase awareness of biases related to different diversity dimensions, such as culture, nationality, gender or religion, "Unconscious Bias" workshops were launched in 2023. The target group initially consisted of the first management level below the executive board. In the fiscal year 2024/25, training was extended to the corporate departments HR and finance as well as the diversity and inclusion task force. The workshops are offered across the group, except for AGRANA, which has its own training on this topic. Additional training courses are also offered. The topic of discrimination is addressed, for example, within the framework of human rights training. The first workshops for Südzucker Group employees in Germany to raise awareness of anti-Semitism were also held in cooperation with the Remembrance, Responsibility and Future Foundation in fiscal 2024/25.

As a preventive measure, we have also established a permanent ambassador network to help strengthen networking in the area of diversity and inclusion within Südzucker Group and raise awareness of this topic. Members of the network are also there to support those affected locally in difficult situations. We also established a "Pride at Work Community" in the 2024/25 financial year to raise awareness of LGBTQIA+ topics and issues across the group and to promote understanding in the workplace.

Social audits play a crucial role in implementing due diligence obligations towards one's own workforce. Südzucker is a member of the SEDEX<sup>1</sup> platform for improving responsible and ethical

business practices in global supply chains and is regularly audited by independent institutions using the SMETA<sup>2</sup> methodology. By doing so, we seek to showcase our commitment to the principles of social sustainability, including the ban on discrimination and harassment, which is expected to result in greater transparency in our sustainability management. In addition to reviewing human rights, working conditions and health and safety standards, a SMETA audit examines business ethics, including compliance with the law and prevention of bribery, corruption and fraud. Comprehensive information is also provided on environmental practices at the sites. SMETA audits are usually held every three years. At the end of the 2024/25 financial year, a total of 63 (63) Südzucker Group's locations still had valid SMETA or comparable social audits in place. All production locations registered with SEDEX also conduct a SEDEX self-assessment.

The HR officers in the respective country or division typically determine the necessary actions as part of the existing management processes.

In the event of actual instances of inappropriate conduct, employment-related consequences will be enforced as remedial measures. In the fiscal year 2024/25, incidents of workplace discrimination occurred at certain locations, for example. Implemented actions consisted of awareness campaigns and employment-related measures like warnings or dismissals upon established gravity. There are no additional actions to bring about positive effects on the employees.

The effectiveness of the actions taken is evaluated, among other things, through insights from external social audits, ratings or detailed indications.



<sup>&</sup>lt;sup>1</sup> Supplier Ethical Data Exchange (SEDEX).

<sup>&</sup>lt;sup>2</sup> SEDEX Members Ethical Trade Audit.

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#### Actions related to material positive impacts

#### Working conditions

As positive impacts of our business activities, we have identified "good working conditions" (2-S1) and "work-life balance" (3-S1) here. Our primary actions in these fields are:

- The working conditions for most of Südzucker Group's employees, both in production and in administrative areas, are safeguarded by collective bargaining agreements. Depending on the country, this encompasses issues such as secure employment, fair working hours, decent pay and social dialogue to ensure good working conditions for our employees.
  - Decent pay: Südzucker Group's payment system is based on fixed and variable components along with supplementary benefits. Depending on the region and the group company, the supplementary benefits include monetary and non-monetary components, such as a company pension plan, profit sharing, Christmas bonuses, share ownership plans and various insurance policies, some of which also apply in the private sector. In addition, employees under collective agreements in Germany receive separate compensation for work on Saturdays, Sundays, public holidays and at night. For the number of collective agreements in the reporting year, see → section "Collective bargaining coverage and social dialogue".
  - Social dialogue: see → section "Processes for engaging with own workers and workers' representatives about impacts".

- Our "Policy on working hours", which applies throughout the Group, recommends that we offer our employees the opportunity to work remotely, provided the position in question allows this and the employee is personally suited to it. In addition, wherever possible, we offer flexible working hours, temporary part-time positions, as well as childcare during school holidays or special leave for significant family events in all business areas.
- We also offer our employees, especially in the commercial sector, broad access to digital collaboration tools and the opportunity to work in international project groups as part of our New Work initiative.

With the help of the turnover rate, we can track the effectiveness of our actions. The HR officers in the respective country or division typically determine the necessary actions as part of the existing management processes. There are currently no further actions to report.

### Equal treatment and opportunities for all

We see the "Development opportunities for employees" (8-S1) as having a positive impact on our business activities. We further expanded the range of group-wide and division-specific learning opportunities and development measures in the 2024/25 financial year. Our ambition is to develop a holistic, modular training program that supports both our managers and our employees in their individual development by means of different levels and formats.

In this context, our digital learning platform, the Südzucker Group Campus, plays a crucial role in providing this support. It is permanently available to the majority of Südzucker Group

employees. On the one hand, the Südzucker Group Campus supports regular, documented mandatory training, as well as adherence to legal and other code requirements (work safety, compliance, data security, hygiene, environmental protection, human rights, etc.). Since November 2023, the Südzucker Group Campus has also offered a new and steadily expanding range of online training courses to develop essential soft skills, including presentation techniques, remote working and personal branding. The catalog of training and further education courses is augmented by new self-directed online language training courses and additional face-to-face events aimed at improving specialist and methodological knowledge (e.g., conducting job interviews, agile project management) or strengthening personal or social skills (e.g., modern self-management and time management, strengthening personal resilience). Naturally, employees receive support when selecting external seminars that extend beyond the scope of our training catalog. In addition, trainee programs and junior management programs are regularly conducted. During regular feedback discussions, executives should collaborate with their employees to explore ideas for their ongoing education and personal growth.

The leadership training for executives aims to convey a modern and unified leadership model based on leadership principles, serving as a guide for effective leadership conduct and strengthening key leadership competencies, including communication and employee development. In addition, ongoing training courses such as "Lateral leadership — leading without disciplinary responsibility" and "From employee to manager" are offered. In order to address some of the special challenges in the production environment, additional specific training courses are also offered for foremen.



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The group-wide IOP onboarding program is designed to facilitate networking among younger employees from different departments and locations, deepen insight into international group structures and promote mutual understanding and personal growth. In order to share experience and knowledge and support the timely implementation of key projects, we have held regular international, sometimes group-wide meetings of various corporate departments for many years.

The development opportunities specifically for female employees are described in the section "Equal treatment and opportunities for all" ("Empowering Woman" program, mentoring program).

Using the turnover rate, we can assess the effectiveness of our actions. The HR officers in the respective country or division typically determine the necessary actions as part of the existing management processes. There are currently no further actions to report.

#### Actions related to material risks

Risks arise from the dependence on our own workforce, which is inherent to our business model. External developments, such as demographic trends and shifting values, play a significant role here. We have identified three material risks related to working conditions: "Business interruption due to labor disruption" (5-S1), "Shortage of skilled workers" (6-S1) and "Loss of know-how due to employee turnover" (7-S1). These risks are already integrated into our risk management. No significant opportunities were identified regarding our own workforce in the materiality analysis.

The core actions outlined in the previous sections, which we use to counter the negative and positive impacts of our business activities on our workforce, also help mitigate the main risks related to working conditions. Collective bargaining agreements, for example, are crucial for regulating wages and working conditions. Conflicts could trigger strikes, and dissatisfaction with the results might weaken employee loyalty and damage our company's reputation in the long run. Therefore, we consider open dialogue and the inclusion of employee representatives to be essential. Poor personal development and a lack of opportunities for advancement might result in dissatisfaction and low motivation at work, which could be a reason for employees to leave the organization.

With regard to 6-S1 and 7-S1, we have implemented additional preventive measures. A policy has been in place since the 2023/24 fiscal year to ensure that key positions in the company are filled in good time and in line with requirements. Systematic succession planning should also help secure valuable expert knowledge, motivate and retain employees by highlighting internal promotion/career opportunities and reduce recruitment costs. Vacancies are usually advertised internally and, if appropriate, preference is given to employees from within. We strive to preserve know-how and experience within Südzucker Group, foster career mobility and strengthen the sharing of knowledge and experience between locations and divisions.

We also continued Südzucker AG's 2024/25 training initiative to increase the company's visibility and attractiveness as a training provider. Among other things, marketing measures were implemented throughout Germany, and partnerships with schools and educational institutions were expanded. Our educational offerings continue to be a crucial element in meeting the long-term needs of our skilled workforce.

With the procedures and actions described above, we aim to ensure that our own business practices do not cause or contribute to any significant negative impacts on our own workforce. For instance, we aim to make the shift systems reliable and minimize night shifts as much as possible, as they are particularly taxing on the health of the workforce.



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# **Targets and metrics**

The following targets and metrics are designed to mitigate significant negative impacts, promote positive ones and minimize substantial risks.

# S1-5 – Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities

Regarding our own workforce, we have set two group-wide targets to address significant negative impacts, which were decided in 2022 by the executive board following the recommendation of the respective departmental head at the corporate level. The targets relate to the identified negative impacts. No targets have been set in terms of impacts and risks because the focus is currently on mitigating the negative impacts of Südzucker Group's operations on its workforce. Using the turnover rate, we can track the effectiveness of our actions regarding material positive impacts and risks.

Our absolute objective is to cut Südzucker Group's accident rate by more than half from 11.1 in 2021 to 5.0 by 2026. The objective is related to 1-S1 and contributes to achieving the strategic objectives of our policy in the area of occupational safety. In fiscal year 2024/25, the accident rate was 8.4. The positive trend affirms the advancements already accomplished in reaching the target.

The target definition is based on existing internal accident statistics and a benchmark both within Südzucker Group and with other companies; no stakeholders were involved in setting this specific target. Work-related accidents are recorded if they have resulted in one or more days of absence. The accident rate refers to the number of accidents per one million working hours. The executive board oversees the attainment of the target.

Südzucker Group has committed to the absolute objective of increasing the proportion of women at the first and second management levels below the executive board to 25 % by 2027. The target is related to 9-S1 and contributes to achieving the strategic objectives of our HR strategy with a focus on diversity and inclusion. In the 2022/23 fiscal year, the proportion of women in the first and second management levels was 19 %; in the 2024/25 fiscal year, it remained unchanged at 19 %. The current progress towards reaching the target does not match the initial plans. The target definition is based on existing internal statistics; no stakeholders were involved in setting this specific target. The executive board oversees the attainment of the target.

At present, we are engaged in another target within the HR field, aiming for its completion in the 2025/26 business year.

#### S1-6 - Characteristics of the undertaking's employees

The data on employees of Südzucker Group is provided as a head-count as of the fiscal year-end date (28 February 2025). This information is disclosed in note (10) of the notes to the group financial statements. Temporary workers and seasonal workers refer to people temporarily employed to perform seasonal or time-limited tasks when they work regularly for the company over a specific period. The other definitions used correspond to the definitions set out in S1.

#### Südzucker Group employees by gender (headcount)

28 February	2025
Male	13,263
Female	6,679
Other¹	
Not reported	0
Total	19,959

TABLE 063

# Südzucker Group employees by country or region (headcount)

28 February	2025
Germany	4,855
Austria	2,778
Other EU	4,806
Other Countries	7,520
Total	19,959

TABLE 064

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# Südzucker Group employees by type of contract and gender (headcount)

28 February 2025	Male	Female	Other 1	Total
Permanent employees	11,673	5,418	17	17,108
thereof non-guaranteed hours employees	65	19	0	84
Temporary employees	1,590	1,261	0	2,851
thereof non-guaranteed hours employees		8	0	21
Employees	13,263	6,679	17	19,959

1 Gender as stated by the employees.

TABLE 065

# Employee turnover<sup>1</sup>

	2024/25
Number of employees who left during the reporting	
period	3,397
Rate of employee turnover during the reporting period	17 %

<sup>1</sup> Includes seasonal workers.

TABLE 066

The employee turnover rate was calculated based on the number of employees leaving the company in relation to the total number of employees at the end of the financial year. This figure is significantly influenced by our seasonal workers who worked in the sugar segment due to campaign operations.

# S1-8 – Collective bargaining coverage and social dialogue

The proportion of employees covered by collective bargaining agreements is 68 %. In the European Economic Area, our employees are covered by several collective bargaining agreements.

#### Collective bargaining coverage and social dialogue

	Collective bargaining coverage 1	Social dialogue <sup>1</sup>		
0-19 %				
20-39 %				
40-59 %				
60-79 %				
80-100 %	Germany, Austria	Germany, Austria		

<sup>&</sup>lt;sup>1</sup> European Economic Area; information for countries with more than 50 employees, accounting for more than 10 % of the total

TABLE 067

# S1-9 – Diversity metrics

# Gender distribution in top management levels<sup>1</sup> at Südzucker Group

	2025
Head count	in %
372	81
88	19
0	0
0	0
460	100
	372 88 0 0

1 1st management level: management of the corporate departments and executive board/ management of the segments/divisions; 2nd management level: management level that reports directly to the management of the corporate departments and management level that reports directly to the executive board/management of the segments/divisions.

<sup>2</sup> Gender as stated by the employees.

TABLE 068

2025

We are currently realigning and revising the definitions of the 1st and 2nd management levels.

# Employee age groups

28 February

	Head count	in %
Under 30 years old	3,816	19.12
30-50 years old	10,275	51.48
Over 50 years old	5,868	29.40
Total	19,959	100

TABLE 069

#### S1-10 – Adequate wages

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All employees of the company receive an adequate wage that is in line with the applicable benchmarks.

#### S1-14 – Health and occupational safety metrics

### Südzucker Group employees' occupational safety metrics

	2024/25
Percentage of own workforce (headcount) covered by a certified Health & Safety management system	16.5
Number of occupational fatalities <sup>1</sup>	0
Number of work-related accidents <sup>2</sup>	318
Rate of work-related accidents 2,3	8.5

<sup>&</sup>lt;sup>1</sup> Includes fatalities resulting from work-related illnesses. Includes other workers working on our sites.

TABLE 070

# S1-16 – Remuneration metrics (pay gap and total remuneration)

Foreign employees' salaries were usually converted into euros according to annual average exchange rates. For the key figure total remuneration, the remuneration per employment level was included. The salary data is based on payout values.

### Pay gap and total remuneration of employees

	2024/25
Gender pay gap (difference between the average pay level of female and male employees) in %	22
The annual total remuneration ratio of the highest-paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual)	46

TABLE 071

# S1-17 – Incidents, complaints and severe human rights impacts

The information includes, subject to the relevant data protection regulations, work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations during the reporting period. This includes incidents of harassment as a specific form of discrimination.

# Incidents, complaints and severe human rights impacts

	2024/25
Discrimination cases and human rights complaints	
Incidents of discrimination, including harassment	10
Complaints filed through channels (including grievance mechanisms) for people in the undertaking's own workforce (including non-employees) to raise concerns regarding human rights violations; excluding cases of discrimination	1
Total amount of fines, penalties and compensation for damages as a result of the incidents and complaints disclosed above in €, including the cases of discrimination	0
Severe human rights incidents	
Severe human rights incidents connected to the undertaking's own workforce <sup>1</sup>	0
Total amount of fines, penalties and compensation for damages of the incidents as a result of the severe incidents disclosed above in €	0

<sup>&</sup>lt;sup>1</sup> Indication of how many of these are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. If no such incidents have occurred, the undertaking shall state this.

TABLE 072

In fiscal 2024/25, no cases of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises involving our own workforce were disclosed within Südzucker Group.



<sup>&</sup>lt;sup>2</sup> Excluding incidents that occurred while commuting.

<sup>&</sup>lt;sup>3</sup> Lost Time Injury Rate (LTIR); Number of all work-related accidents with at least one lost day per 1 million hours of attendance.

# Social information ESRS S2 — Workers in the value chain

Value chain workers are essential to the success of the Südzucker Group. Being a leading integrated group of companies for plant-based solutions, fair working conditions and respect for human rights throughout our value chain is a key priority for us. This concerns not only our direct team members but also the workforce of our suppliers and partners.

By fostering fair working conditions and upholding human rights, we asssume social responsibility and strengthen the trust our customers and stakeholders have in our company. Implementing human rights due diligence is an essential component of our sustainability strategy, embedded in our corporate strategy and underpinning our commitment to sustainable business practices.

# ESRS 2 SBM-3 – Material impacts, risks and opportunities

Südzucker Group has performed a double materiality assessment in accordance with ESRS 1 to identify material impacts <sup>1</sup>, risks and opportunities (IROs).

Our materiality assessment in the area of "workers in the value chain" revealed the following key subtopics: working conditions, equal treatment and opportunities for all, as well as other work-related rights. The following is a more detailed description of the IROs identified as material to Südzucker Group's workers in the value chain, along with an explanation of their link to the corporate strategy and business model.

Südzucker Group's business model involves the use of plants and other raw materials of agricultural origin to develop, produce and market food, food ingredients, animal feed, ethanol and other products. Our strategy includes a further expansion of technology and market-driven value creation from plant-based raw materials, marking it as one of the five strategic fields of action of our Group Strategy. As a company, this has an impact on workers in our value chain, especially in our agricultural raw material supply chains.

Insufficient health and safety practices in the workplace can compromise the physical integrity of workers and, in the worst case, jeopardize the fundamental right to life (1-S2). Furthermore, the wage received by a worker in a particular location for a regular working week may not suffice to ensure an acceptable standard of living for that person and their family (2-S2). People can face barriers to jobs and training opportunities, earn low wages, or be confined to particular careers due to their gender, skin color, ethnic origin, or religious beliefs (5-S2). Child labor persists in global agricultural supply chains, despite rising international focus, and can cause permanent disabilities, illnesses and psychological injuries to the children affected (6-S2).

These potential negative impacts are typical for the global supply chains involved in the production of agricultural raw materials. They commonly arise from dependence on workers in precarious environments. We identified an actual negative impact of child labor in AGRANA's supply chain in fiscal 2024/25 (7-S2), with appropriate remediation measures implemented.

We have established a systematic, integrated and risk-based management approach to identify, prevent, minimize or eliminate these potential and actual negative impacts in our value chain and the associated human rights risks or violations. Throughout the fiscal year 2024/25, our method for conducting risk analysis of our supply chains was further adjusted within the scope of the continual advancement of the management approach, focusing specifically on agricultural supply chains where we have identified our substantial impacts and human rights risks. The outcomes are integrated into the relevant business processes.

The management approach is a fundamental part of the "Growing in Balance" sustainability strategy, making it a key element of our group strategy. Within the "People" pillar of our sustainability strategy, we have reiterated our dedication to upholding human rights and backed it with actions during the last financial year.

Reliance on labor in our supply chains, such as agricultural and harvest workers, is dictated by our business model. This fact, along with our strategic commitment to respecting human rights in our global value chain, may lead to higher procurement costs, whether through increased efforts for qualification measures with suppliers or potential supplier changes (3-S2). Moreover, incidents in our supply chains, such as non-compliance with occupational health and safety measures or child labor, may cause reputational damage (4-S2). This applies in particular to incidents that can be directly linked to the Südzucker Group. Both the risk of higher purchase prices and the reputational risk are relevant for all three sub-topics.

<sup>&</sup>lt;sup>1</sup> Impacts related to human rights identified in the materiality assessment process laid out in ESRS 1 are to be equated with the risks in accordance with the German Supply Chain Due Diligence Act (LkSG) throughout the text. The human rights-related due diligence obligations also encompass relevant environmental due diligence obligations in the sense of the LkSG.

# Impacts affecting value chain workers

Südzucker Group is linked to various types of workers in the value chain. The material impacts outlined above do not affect all value chain workers of the Südzucker Group, but only those who are engaged in the deeper agricultural upstream supply chain. This also includes workers who are particularly vulnerable to negative impacts due to inherent characteristics or special circumstances. The following impacts are relevant:

- Insufficient health and safety precautions in the workplace
   (1-S2): Numerous agricultural tasks require physical strain or manual labor and frequently take place in open-air settings.

   For workers, physical hazards can pose a direct threat to their health and safety, especially if they are required to work without proper training or protection. As a result, they may develop health issues due to weather conditions, fatigue or repetitive physical motions and overexertion.
- Withholding of decent pay (2-S2): Farming is seasonal employment, leading many workers to face the risk of poverty-level wages. Informal or illegal workers are also found in agricultural supply chains. Given that this usually occurs in remote regions, it can lead to the withholding of decent pay.
- Unequal treatment in the workplace (5-S2): In agriculture, small-scale female and male farmers are particularly vulnerable to social, political, and economic discrimination and marginalization due to their gender, skin color, ethnicity or beliefs. As a result, access to certain occupations, educational and training opportunities, and fair remuneration can be hindered or denied.

# Material impacts, risks and opportunities (IROs) related to value chain workers

Material sub-topics	IRO	Short description	Category	Actual <i>l</i> potential	Value chain	Origin	Time-horizon
Working conditions	1-S2	Insufficient health and safety precautions in the workplace	Negative impact	Potential	Upstream value chain	Südzucker Group	Short-term Medium-term Long-term
	2-S2	Withholding of decent pay	Negative impact	Potential	Upstream value chain	Südzucker Group	Short-term Medium-term Long-term
	3-S2	Higher purchase prices due to potential supplier changes as a result of human rights requirements	Risk	_	Own operations	Südzucker Group	Medium-term Long-term
	4-S2	Reputational risk in the event of non-compliance with legal regulations by suppliers	Risk	_	Own operations	Südzucker Group	Short-term Medium-term Long-term
Equal treatment and opportunities for all	5-S2	Unequal treatment in the work- place	Negative impact	Potential	Upstream value chain	Südzucker Group	Short-term Medium-term
Other work-related	6-S2	Child labor due to violations of the minimum age	Negative impact	Potential	Upstream value chain	Südzucker Group	Short-term Medium-term Long-term
rights	7-S2	Child labor due to violations of the minimum age	Negative impact	Actual	Upstream value chain	AGRANA	Short-term

TABLE 073

Child labor due to violations of the minimum age (6-S2 and 7-S2): The risk of child labor is heightened particularly for products where payment is tied to the amount harvested.
 Even children of seasonal and itinerant workers are at a greater risk of working in the fields with their families, since attending school is not always feasible due to constantly changing locations.

All of the material impacts identified are systemic in nature and widespread in agriculture, particularly outside Europe. This holds true particularly with regard to child labor.

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As part of the materiality assessment, we have identified both sector-specific and topical risk factors, with a focus on groups that are more vulnerable to certain impacts due to legal, political, social or economic marginalization. The protection of vulnerable groups is a particularly high priority within our due diligence obligations. The impacts primarily relate to agricultural workers, especially seasonal and itinerant workers, women and children on family-owned farms.

The financial risks identified for the Südzucker Group in the materiality assessment (higher purchase prices and reputational damage) do not stem from the impact on specific employee groups.

# Impact, risk and opportunity management

#### S2-1 – Policies related to value chain workers

Südzucker Group is aware of its corporate responsibility and is committed to respecting human rights and the associated environmental rights, as well as providing access to remedies for those affected by human rights violations. We have enshrined this objective in our policy statement on Respect for Human Rights, among other things. Here, we also explain how we meet our obligations regarding human rights. The findings from the direct and indirect exchange with the stakeholder group "Workers in the value chain" were incorporated into the preparation of the policy statement. The policy statement is available to all interested parties on our company website.

The scope of the policy statement and the corporate due diligence obligation under the German Supply Chain Due Diligence Act (LkSG) extends to Südzucker Group's own business operations and the business activities of Südzucker Group, including all group companies where Südzucker Group has a decisive influence, with the exception of the AGRANA Group. It also applies to all employees and business associates along our global supply and

value chain. AGRANA has its own policy statement, which is available on the AGRANA Group's website.

According to our policy statement, we align our corporate activities and our human rights due diligence processes with the following internationally recognized standards: Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, core labor standards of the International Labor Organization (ILO), OECD Guidelines for Multinational Enterprises, Ten Principles of the UN Global Compact (UNGC), Supplier Ethical Data Exchange (SEDEX) regulations.

In fiscal 2024/25, one case of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises involving workers in the value chain were disclosed in Südzucker Group's upstream and downstream value chains (IRO-7-S2).

Südzucker Group acknowledges the above-mentioned negative impacts on workers in the value chain with this policy statement. This includes the issues identified as material: Insufficient health and safety precautions in the workplace (1-S2), withholding of decent pay (2-S2), unequal treatment in the workplace (5-S2) and child labor due to violations of the minimum age (6-S2 and 7-S2). Other human rights-related topics are also addressed.

We are committed to adhering to applicable legal regulations and the internationally recognized standards for the protection of human rights, as outlined above, as an integral part of our corporate responsibility. This encompasses legal regulations on working conditions applicable in the respective countries, as well as the exclusion of child, forced and compulsory labor and the prohibition of human trafficking.

Actions to implement our due diligence obligations regarding the impacts identified in the materiality assessment are intended to ensure that potentially affected groups of people are protected and risks are mitigated. For this purpose, processes have been established, emphasizing open communication (whistleblower system) and exchange (e.g., in industry initiatives or networks). Our whistleblower system is a key element of our human rights-related risk management, allowing us to effectively implement remedies and enhance our processes with the insights gained ( $\rightarrow$  ESRS G1 – Business conduct).

Our human rights-related principles are embedded in our code of conduct and our supplier code of conduct in addition to the policy statement. The code of conduct is binding for all executives and employees and applies to all Südzucker Group companies with the exception of AGRANA. AGRANA has its own code of conduct, which considers and applies the content of Südzucker Group's code of conduct. The Südzucker Group expects suppliers and partners to adhere to the principles outlined in this code of conduct. This expectation is specified in the supplier code of conduct. It outlines sustainable procurement guidelines aimed at business partners, suppliers and upstream suppliers of the Südzucker Group, except for AGRANA. It stipulates provisions concerning the safety of workers, precarious work, human trafficking, the use of forced labor and child labor. These provisions comply with the applicable ILO standards. The supplier code of conduct also refers to basic international standards and directives, which contain provisions on precarious work and human trafficking that go beyond the aforementioned provisions. The supplier code of conduct is accessible to all interested parties on our company website. AGRANA has its own code of conduct, which considers and applies the content of Südzucker Group's supplier code of conduct.

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Overall responsibility for human rights due diligence lies with Südzucker Group's executive board. The executive board has set up the group human rights committee to provide advisory and coordinating support to the executive board and the Group's subsidiaries — with the exception of AGRANA — in fulfilling due diligence obligations. AGRANA covers the fulfillment of due diligence obligations in the area of human rights by way of its own compliance management system and supports Südzucker Group's executive board in fulfilling its overall responsibility.

The duties of the group human rights committee encompass monitoring human rights-related risk management, evaluating regular human rights-related risk analyses, further developing human rights-related risk management by reviewing violations and deriving suitable measures, along with providing advice. The group human rights committee is composed of the leadership roles of Corporate Human Resources, Corporate Sustainability, Corporate Procurement and Südzucker AG's Compliance Officer. It is chaired by the compliance officer. The group human rights committee convened four times in fiscal 2024/25.

We use established management processes to identify and assess potential negative impacts or risks concerning human rights or human rights violations early on and to counteract them effectively. In doing so, we incorporate insights from various sources and exchange formats. The identification relies, among other aspects, on the analysis and evaluation of selected internationally recognized indices specific to countries and industries.

The findings from our human rights risk analysis are a key element in the formulation of appropriate measures. The Südzucker Group's human rights-related risk analysis is carried out regularly once a year or on an ad hoc basis and covers, among other areas, the supply chains.

The group human rights committee evaluates and monitors the steps and results of the risk analysis. The findings are important input for the materiality assessment in accordance with ESRS 1 and are used, among other purposes, to further adapt and create guidelines, processes and training.

# S2-2 – Processes for engaging with value chain workers about impacts

As part of our annual human rights-related risk analysis and for the further development of our management approach, we assess various sources on the situation of workers in our value chain and incorporate new findings. We consider, for instance, the "Business and Human Rights Guide" of the UN Global Compact. A meeting with the internal representatives of the stakeholder group "Workers in the Value Chain" took place in the financial year 2024/25 as part of the materiality assessment in accordance with ESRS 1. The workers are also directly involved at irregular intervals, e.g., as part of audits or specific, project-related measures. Notices and complaints, for instance, those channeled through the whistle-blower system, contribute to the management framework. Workers are currently not systematically or directly integrated into the value chain.

# S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns

To promptly and effectively address indications of human rights violations, they can be reported directly to the respective contacts within the company. Südzucker Group's whistleblower system and its channels for reporting cases are fully described in the ESRS G1 — Governance chapter in the section on whistleblower systems. The listed channels enable affected parties or observers to confidentially report potential cases within our supply chains.

Südzucker Group's grievance mechanism and a detailed description of how to handle information are published on our company website and accessible to everyone. We also refer to the various reporting channels in the code of conduct and in the policy statement on respect for human rights. The reporting channel, Südzucker compliance line, is accessible in seven languages: German, English, French, Dutch, Polish, Romanian and Spanish. Further specific measures to support the availability of the grievance mechanism directly at the workplace of workers in the supply chain have not yet been implemented. We will assess and, if necessary, implement further promotion of our grievance mechanism as part of our ongoing management approach development.

All submitted information will be carefully checked and processed as part of the whistleblower procedure. The processing generally proceeds as follows: In cases where the whistleblower offers a contact option, they will get an acknowledgment of receipt within seven days of submitting their report. For all reports that are not submitted anonymously, a factual discussion takes place between the Südzucker Group and the whistleblower.

In cases where the whistleblower has provided a contact option, they will receive information on the progress of the processing of the report following the confirmation of receipt. In the case of human rights-related notices, they receive information about the result of the investigation and any remedial and preventive measures initiated within three months at the latest. Information will only be given if it does not interfere with internal investigations or inquiries, or compromise the rights of the individuals involved in a report.

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When the examination of the situation reveals that the notice concerning workers in the value chain is justified, the Südzucker Group takes appropriate prevention and/or remedial measures.

Remedial measures are defined and established specifically for each individual case with the involvement of the relevant department and, if necessary, with external experts to incorporate the perspective of the affected group. The definition includes an assessment of the extent to which we, as the Südzucker Group, cause, contribute to or are associated with the negative impacts. Initially, all available information is assessed, any gaps are identified, and a strategy is created to address these gaps and to define and implement suitable actions. Our approach is driven by the aim to achieve a beneficial outcome for both the impacted groups and our company. Possible indicators for measuring effectiveness are identified and the review is planned as early as the definition of measures.

The process for dealing with complaints, including those related to employee matters, is outlined in  $\rightarrow$  chapter ESRS G1 – Business conduct, together with an indication of how the effectiveness of the system is evaluated.

The  $\rightarrow$  chapter ESRS G1 – Business conduct, in the section on whistleblower protection, clearly describes the system's basic principles and refers to the corresponding directives.

It has not yet been studied to what extent the workers in the supply chain are familiar with and have confidence in the whistle-blower protection process. The policy for protecting individuals against retaliation is outlined in  $\rightarrow$  chapter ESRS G1 – Business conduct.

S2-4 – Actions related to material impacts, approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

As part of the risk analysis required by the Supply Chain Due Diligence Act, we take appropriate actions for relevant suppliers or supplier groups depending on the results. Based on the results of the gross consideration of the materiality analysis according to ESRS 1, we conducted further research to align our human rights-related management approach accordingly and to deploy the available resources more effectively. We are currently evaluating potential actions by expanding our specific knowledge and exchanging ideas with the UN Global Compact and other companies, for example. We are also currently working on a policy for further integrating human rights-related criteria into our supplier selection process. This is why we already take various certifications into account when procuring selected agricultural raw materials, which include human rights aspects, such as RedCert<sup>2</sup>.

In fiscal 2024/25, we established and developed the Corporate Human Rights Team within the sustainability sector to centrally consolidate human rights-related resources and activities. The team formulates and oversees the necessary processes and actions for the companies within the Südzucker Group (excluding AGRANA). The scope of the centralized approach to managing human rights includes the company's own business area, the value chain and customer requirements. For this purpose, four new fulltime positions were created in the fiscal year 2024/25. Furthermore, other corporate departments are involved in the implementation of actions as needed. With our risk-based approach, we strategically allocate existing resources to further develop our management approach for implementing our due diligence obligations concerning human rights. Indicators that can be used to assess effectiveness are incorporated wherever possible during the measure determination process. This is based on a compiled summary of different qualitative and quantitative indicators.

A certified compliance management system has been established at AGRANA, which includes human rights and is operated and monitored by the compliance office.



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By implementing our human rights due diligence obligations, we strive to reduce our negative impacts (1-S2, 2-S2, 5-S2, 6-S2, 7-S2) and also to prevent the risk of reputational damage to our company (4-S2). The actions taken and planned are described below. No material opportunities in relation to human rights were identified in the materiality assessment in accordance with ESRS 1.

During fiscal 2023/24, we have already drawn up a set of actions, enabling us to determine initial actions for our direct suppliers depending on the assessed risk.

By further developing our approach to human rights risk analysis in the 2024/25 financial year, we gained a deeper understanding of potential human rights risks, including those located further down our supply chains. These findings are also reflected in the materiality assessment and form the basis for further targeted actions.

Currently, it primarily comprises actions for our direct suppliers, but is continually under review and adaptation. Since our material impacts, in particular, are found in our deeper supply chains, we aim to enhance the set of actions with appropriate actions in the 2025/26 financial year.

Aside from the actions to avoid negative impacts of our own practices (—) section "Actions to avoid negative impacts of our own practices"), the following actions were taken in the financial year 2024/25 to avoid or mitigate adverse impacts of our actions on human rights:

- We have set up the central Corporate Human Rights Team in the sustainability section to implement our human rights due diligence in the Südzucker Group – with the exception of AGRANA – in order to systematically develop the topic.
- We implemented the training program on human rights at Südzucker for all members of the sustainability organization and for the members of the cross-divisional working group on responsible procurement with purchasing experts from various procurement departments in the Südzucker Group.
- We have also raised awareness of human rights among Südzucker Group employees by implementing further communication measures.
- We communicate our expectations in our supplier code of conduct and urge our suppliers to address and implement the principles contained therein with their own suppliers. This applies particularly to suppliers with agricultural supply chains. The supplier code of conduct is attached to the purchasing terms and conditions and addresses topics such as workplace health and safety precautions, decent pay, diversity and equal opportunities, and a ban on child labor. It thus refers to the potential negative impacts of the Südzucker Group on workers in the value chain. As a publicly listed company, AGRANA has its own code of conduct.

For the fiscal year 2025/26, we are planning the following actions in particular:

- Further optimization and integration of our human rights management approach into relevant business processes, such as the implementation of the further integration of human rights requirements into our supplier contracts.
- The enhancement of our current actions catalog for preventive initiatives, focusing specifically on the identified critical IROs related to human rights.
- Setting up initiatives to continue improving our grievance mechanisms.

We will incorporate the outcomes of the risk analysis through all our actions and take a risk-based to push forward the realization of our strategy. In choosing specific actions, we also take into account the geography of the upstream and/or downstream value chain and any relevant stakeholders.

The aforementioned preventive actions are designed to be continuous and ongoing and do not constitute a comprehensive action plan.

No significant investments were needed for the execution of the action plan devised within the framework of continuous development, neither in the past fiscal year nor in the fiscal year 2025/26.



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Remedial measures have been taken regarding the actual significant impact in the form of child labor due to violations of the minimum age (7-S2). In AGRANA's specific instance, the supplier was promptly asked to stop using child labor and to comply with the code of conduct. Further training on the code of conduct was provided and, in addition, this supplier is being closely audited. Intensive monitoring is intended to ensure that child labor is not used again. The effectiveness of the actions was verified in subsequent audits, and no employment of minors was detected.

The Südzucker Group is committed to the UN Global Compact to promote positive impacts for the workforce by sharing our experiences and exchanging ideas with other companies. The Südzucker Group is also participating in the "Sustainable Agriculture Initiative", specifically in the regenerative agriculture working group. The objective of this group is to collect and share findings based on results-oriented key performance indicators in order to drive forward the scaling of regenerative processes, including the social aspects, together with all partners in the value chain.

The actions described do not address the risk of higher purchase prices due to potential supplier changes or higher expenses as a result of qualification measures for products that were not previously covered (3-S2). Nevertheless, we aim to minimize costs by using appropriate actions in accordance with our risk-based management approach, taking into account external developments, and to employ the aforementioned resources as efficiently as possible to keep the risk minimal. The risks identified as material are embedded within Südzucker Group's existing risk management.

The effectiveness of these actions is assessed, among other things, by the findings of external audits, such as those conducted as part of certification for RedCert<sup>2</sup>, ratings or incoming information.

Indicators that can be used to assess effectiveness are incorporated wherever possible during the measure determination process. Going forward, a summary will be provided that outlines the different qualitative and quantitative indicators; the expected result for the actions will be described in detail as well. No targets have been set at the moment.

#### Actions to avoid negative impacts from own practices

Südzucker Group's code of conduct supports employees in their daily work, particularly in critical situations, in acting responsibly, appropriately and in compliance with the law. It forms the fundamental understanding, in line with applicable law, for the Südzucker Group on how to collaborate and succeed in the market. It is a vital part of the company's image as a credible and trustworthy partner.

The supplier code of conduct is derived from the Südzucker Group's own code of conduct. The guidelines for suppliers to the Südzucker Group are specified, defined and regulated in order to ensure sustainable purchasing. These principles and values form the basis of Südzucker Group's business relationships with its suppliers. In cases where we identify violations by suppliers, we initially work closely with them to achieve improvements. As a last resort, if progress is not made, we consider terminating the business relationship, while developing plans to minimize any negative impact on the affected workers.

Südzucker AG has been a member of the global Sustainable Agriculture Initiative Platform (SAI) since 2015. By actively participating in SAI, we document our adherence to comprehensive environmental and social sustainability criteria in compliance with the Farm Sustainability Assessment (FSA) in the sugar, special products, starch and fruit segments. We source a significant portion of our raw materials in these segments with consideration of compliance with these criteria or standards recognized as equivalent by SAI (e.g., RedCert<sup>2</sup>). Every year, more than 200 external audits are carried out at the growers' premises as part of the certification process. In fiscal 2024/25, FSA Gold status – the highest FSA rating for sustainability – was achieved once more in Germany, Belgium, France and Poland. The chicory growers in Belgium, who produce for the BENEO division, also hold FSA Gold status. Within AGRANA, all farmer groups, with a few exceptions, achieved FSA Silver status or higher. In the SAI's FSA, information on working conditions and social standards, health and safety, child and forced labor, as well as diversity and equal treatment is queried and evaluated, among other things.

Experts from various purchasing departments within the Südzucker Group are working together on the key area of "responsible purchasing" as part of our "Growing in Balance" sustainability strategy. The aim is to further advance sustainability in purchasing throughout the entire Südzucker Group and to avoid any potential negative impacts of our actions. During the 2024/25 financial year, we initiated the development of a company-wide procurement purchasing strategy that emphasizes sustainable and long-term relationships with suppliers of goods and services. The purchasing experts involved were assigned human rights training in the 2024/25 financial year.

In fiscal 2024/25, there was one reported incident of a human rights violation in Südzucker Group's value chain.



# **Targets and metrics**

# S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

We are currently not aiming for any group-wide targets in the area of human rights. The foundation for crafting possible objectives is currently underway; we expect to determine suitable objectives in fiscal 2025/26.

# Social information ESRS S4 — Consumers and end-users

Being an integrated group of companies with plant-based solutions for nutrition, energy and other applications, Südzucker Group seeks to contribute to an enjoyable, healthy and sustainable world. Approximately 20,000 employees are dedicated across our five segments to providing high-quality and safe plant-based solutions for our customers, including consumers and end-users.

Südzucker Group focuses on the business-to-business sector with the marketing of intermediate products. End products for consumers and end-users are only manufactured in the sugar, special products (Freiberger division) and starch segments, which are likewise sold on a business-to-business basis. Südzucker Group does not directly distribute its products to end customers.

# ESRS 2 SBM-3 – Material impacts, risks and opportunities

Südzucker Group has performed a double materiality assessment in accordance with ESRS 1 to identify material impacts, risks and opportunities (IROs).

Our materiality assessment for consumers and end-users (hereafter referred to as "end consumers") revealed a material sub-topic:

### Material impacts, risks and opportunities (IROs) related to consumers and end-users

IRO	Short description	Category	potential	Value chain	Origin	Time-horizon
1-S4	Contribution to food security by providing high-standard, safe and diverse food	Positive impact	Actual	Downstream value chain	Südzucker Group	Short-term Medium-term Long-term
2-S4	Cases of deviations in product safety	Negative impact	Potential	Downstream value chain	Südzucker Group	Short-term
3-S4	Negative effects on consumer health as a result of their consumption behavior	Negative impact	Potential	Downstream value chain	Sugar division (Südzucker)	Long-term
<del>4</del> -\$4	Health benefits for consumers through functional ingredients and vegetable proteins	Positive impact	Actual	Downstream value chain	BENEO	Medium-term Long-term
5-S4	Liability claims and reputational damage due to deviations in the safety of a product	Risk	_	Own operations	Südzucker Group	Short-term Medium-term Long-term
	2-S4 3-S4 4-S4	1-S4 Contribution to food security by providing high-standard, safe and diverse food  2-S4 Cases of deviations in product safety  3-S4 Negative effects on consumer health as a result of their consumption behavior  4-S4 Health benefits for consumers through functional ingredients and vegetable proteins  5-S4 Liability claims and reputational damage due to deviations in the	1-S4 Contribution to food security by providing high-standard, safe and diverse food  2-S4 Cases of deviations in product safety impact  3-S4 Negative effects on consumer health as a result of their consumption behavior  4-S4 Health benefits for consumers through functional ingredients and vegetable proteins  5-S4 Liability claims and reputational damage due to deviations in the	IRO     Short description     Category     potential       1-S4     Contribution to food security by providing high-standard, safe and diverse food     Positive impact     Actual       2-S4     Cases of deviations in product safety     Negative impact     Potential impact       3-S4     Negative effects on consumer health as a result of their consumption behavior     Negative impact     Potential impact       4-S4     Health benefits for consumers through functional ingredients and vegetable proteins     Positive impact     Actual       5-S4     Liability claims and reputational damage due to deviations in the     Risk     —	IRO       Short description       Category       potential       Value chain         1-S4       Contribution to food security by providing high-standard, safe and diverse food       Positive impact       Actual       Downstream value chain         2-S4       Cases of deviations in product safety       Negative impact       Potential       Downstream value chain         3-S4       Negative effects on consumer health as a result of their consumption behavior       Negative impact       Potential       Downstream value chain         4-S4       Health benefits for consumers through functional ingredients and vegetable proteins       Positive impact       Actual       Downstream value chain         5-S4       Liability claims and reputational damage due to deviations in the       Risk       —       Own operations	1-S4 Contribution to food security by providing high-standard, safe and diverse food  2-S4 Cases of deviations in product safety  Negative impact  Negative impact  Negative impact  Negative chain  Downstream value chain  Südzucker Group  Südzucker Group  Südzucker Group  Südzucker Group  The safety  Negative effects on consumer health as a result of their consumption behavior  4-S4 Health benefits for consumers through functional ingredients and vegetable proteins  Positive impact  Actual  Downstream value chain  Südzucker  Group

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personal safety of consumers and/or end-users The following is a more detailed description of the IROs identified as material to end consumers for the Südzucker Group, along with an explanation of their connection to the corporate strategy and business model. They refer to the areas of product safety and nutrition. The identified impacts in the area of product safety essentially apply equally to our industrial customers and end consumers. Within the nutrition area, their focus is entirely on end consumers.

Three of the five Südzucker Group segments (sugar, special products [Freiberger division] and starch) produce end products for individual end consumers. The products are offered to all end consumers. Südzucker Group companies do not actively target individual end consumer groups that are particularly vulnerable to health impacts or the impacts of marketing and sales strategies; the marketing impacts of our industrial customers are not under our

responsibility. In the materiality assessment according to ESRS 1, we identified our impacts on children and infants as a separate, particularly vulnerable consumer group; the identified material IROs pertain to all end users.

Being part of the food industry, Südzucker Group aims to deliver high-quality, safe and diverse food to our customers and end consumers and thus contribute to food security (1-S4). Our product portfolio in the food sector includes sugar, sugar specialties and glucose syrups, functional ingredients, frozen and chilled pizzas, portion pack articles as well as fruit preparations and fruit juice concentrates. This material positive impact results from Südzucker Group's food production activities and applies to all end consumer groups, due to the fact that the products are generally available to everyone.

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As Europe's largest sugar producer, we consider our purpose to be contributing to a world that is both enjoyable and sustainable. Sugar plays several roles in food products: It serves as a flavor booster, enhances texture and volume positively, acts naturally as a preservative, and sweetens in a natural way. Alongside this, sugar is an energy supplier as part of a balanced diet; the frequency and amount of consumption, as well as the overall calorie balance of the diet, are important. When foods that contain sugar along with other calorific ingredients are consumed excessively over a long period, this could result in negative health impacts for end consumers. Such factors include the progression from overweight to obesity and the consequent diseases, which might potentially exhibit a systemic character (3-S4).

Südzucker Group cannot directly influence the consumption patterns of the end consumers of our products or the production and marketing strategies of our industrial clients in the downstream value chain.

The functional ingredients of the BENEO division provide health benefits to the end consumers. Nutritional claims are indispensable for the marketing of these ingredients. For this reason, we are advancing our intensive research in nutritional science. The studies focus on topics such as improved blood glucose management, metabolic regulation, gut health and protein quality information. The EU authorities and member states strictly regulate the communication of health benefits of food to European end consumers. Food manufacturers that use BENEO products can use nutrition and health claims depending on the ingredient to communicate health and nutrition benefits to end consumers (4-S4). Consumer groups benefiting from the advantages include athletes, sports enthusiasts, and infants. BENEO does not directly involve or address the end consumer.

The introduction and maintenance of a consistent quality management system and compliance with legal standards do not exclude the risk of products failing to meet the applicable safety requirements, which could lead to adverse effects on end consumers (2-S4). This involves individual incidents, e.g., in the context of product recalls. This impact results in a risk of liability claims and reputational damage due to deviations in the safety of a product (5-S4). In principle, this will affect all end consumers. There is no dependency on end consumers or connection to external developments.

The material impacts we have on end consumers result from our business model that involves food manufacturing. Our business model is associated with a reliance on end consumers who are ready to either consume our products or those made with food ingredients from Südzucker Group, or to avoid them. Meanwhile, consumer habits and new nutritional trends are influencing our business and may lead to adjustments to our corporate strategy. We are, for instance, planning to further expand the technologyand market-driven value creation from plant-based raw materials, taking into account our business model, as one of the five strategic action fields of our corporate strategy. In particular, our strategic alignment envisions an expansion of activities in the sector of plant-based proteins. Furthermore, as part of the focus area of "conscious consumption" in our "Growing in Balance" sustainability strategy, we strive to enable our customers and consumers to make informed decisions by providing an extensive variety of products - from indulgent options to ingredients for a balanced diet.

# Impact, risk and opportunity management

Product safety is governed because of the variations in product portfolios across the divisions of Südzucker Group. Currently, there is no cross-divisional management of product safety or quality management at the corporate level.

The divisions are also responsible for the topic of nutrition. The focus area of "conscious consumption", one of the eight focus areas of our group-wide "Growing in Balance" sustainability strategy, serves as a unifying framework for Südzucker Group. Due to the group's significant diversification and the resulting differences in product portfolios, customer structures, and consumer interactions, the implemented actions are specific to each division.



### S4-1 – Policies related to consumers and end-users

Südzucker Group has policies and guidelines in place to prevent, mitigate or improve the negative impacts associated with consumers, enhance the positive impacts and minimize the risks.

The topic of product safety is embedded in our code of conduct, which encourages our employees to comply with all relevant national, European and international provisions on quality and hygiene, as well as our self-imposed product safety requirements ( $\rightarrow$  ESRS S1 – chapter Own workforce). This covers the material IROs 1-S4, 2-S4 and 5-S4 and meets the needs of all consumers of our end products.

Additionally, each division of Südzucker Group has its own quality guidelines in their specific domains. These guidelines define the respective Group division's commitment to product safety and outline the systems and processes that ensure the commitment is met and customer and consumer needs are addressed. A key aspect is the advancement of food and product safety culture, achieved by increasing awareness, improving knowledge and encouraging proper employee conduct.

The quality guidelines are based on the international HACCP (Hazard Analysis Critical Control Point) approach from the FAO/WHO Codex Alimentarius, which forms the key element of our food safety system. The system is used to systematically analyze product hazards and critical control points associated with raw material properties and end products, production steps, as well as transportation and storage factors. Based on this analysis, relevant steps are implemented as required to ensure that no threats arise for end consumers. The divisional quality departments are tasked with executing the quality guidelines, while their implementation is supervised by the respective management or executive board. The guidelines address the material IROs 1-S4, 2-S4 and 5-S4 and cover the concerns of all consumers of our end products.

The policies related to nutrition are aimed, among other things, at promoting our products responsibly. As an example, the sugar division (Südzucker) pledges responsible marketing practices and transparent communication towards end consumers, business partners, and society in its "responsible marketing strategy" guideline. The aim is to enable our customers to make informed and well-founded consumption decisions based on the information we provide. The guideline formulates principles that must be adhered to in all marketing activities by both our own experts and partners such as media and marketing agencies, as well as influencers. There is a particular emphasis on ensuring that all marketing materials, including product packaging, accurately depict the products and avoid any misleading advertising statements, like those regarding health benefits. It also stipulates that children must not be targeted by our marketing activities. The responsibility for implementing this guideline lies with the marketing and communication department of the sugar division (Südzucker); the management of this division is responsible for monitoring. The directive addresses IRO 3-S4 and covers the interests of all consumers of our end products.

The impacts we have identified as material relate to the sub-topic "Personal safety of consumers and/or end-users" and do not relate to human rights. In fiscal 2024/25, no cases of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises involving end consumers were disclosed in Südzucker Group's downstream value chain. No severe human rights issues or incidents in relation to end consumers of our products have been reported in fiscal year 2024/25.

# S4-2 – Processes for engaging with consumers and end-users about impacts

In terms of marketing effort, Südzucker Group focuses on the business-to-business sector. In this context, end consumers are only

included in the sugar, special products (Freiberger division) and starch segments. Freiberger, as a private label producer for retailers, is only identified as the manufacturer and contact point for complaints on certain products. End consumers can get involved by providing their contact details on product packaging, or by using the company's websites, email, telephone, mail or social media. This enables us to receive direct feedback and suggestions on how we can further improve our products, as well as requests, for example, for recipes and complaints. Contact is initiated by end-users, which means it can happen at any time and is unpredictable. We also involve end consumers directly in market research studies and consumer surveys, for example to ask for their opinion on product changes or to obtain specific information. The sugar division (Südzucker), for instance, utilizes an online tool to conduct a consumer survey several times a year. In addition, the sugar division (Südzucker) prepares and publishes the study "consumer study – processed food & beverages" once a year. This is intended to provide insights into the end consumers' perceptions (e.g., purchasing criteria, importance of sustainability and naturalness) and to recognize changes in purchasing behavior over the years in order to obtain information for the further development of our own products and those of our customers.

The respective quality (complaints) and marketing (feedback) departments in the companies concerned are responsible for involving the end consumers. The effectiveness of incorporation is assessed in the event of complaints as part of the quality management systems; when it comes to feedback, this is done partially – for instance, by looking at the participation rate in surveys.

In the materiality assessment according to ESRS 1, we incorporated the perspectives of end consumers who may be particularly vulnerable to impacts. Given that the identified material IROs affect all end consumers, there is no further need to gain insights into the perspectives of individual end consumer groups.

# S4-3 — Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

Complaint, incident and crisis management is a key element in addressing the concerns of end customers as part of the quality management of the respective corporate sector. Specific teams are in charge of processing each particular case. This includes a root cause analysis and subsequent corrective actions aimed at continually improving processes and products. In the event that actual negative effects on end-users are detected, quality management will define remedies, such as financial compensation or replacement supplies. These processes are consistently practiced and reviewed in internal and external audits to ensure reliable functioning. In instances of product recalls, we closely examined the root causes, reviewed our processes and made adjustments as required.

End consumers can communicate their concerns directly to Südzucker Group and its associated companies, including complaints, via the contact details provided on product packaging, company websites, email, telephone, mail and social media. We established these channels. Additionally, our confidential whistle-blower system, which can also be used anonymously, is available. Südzucker Group's reporting channel, the Südzucker compliance line, is operated by an external provider. Südzucker Group does not currently support and/or request any channels from its business partners.

The primary principle of our whistleblower system is the protection of the whistleblower in accordance with the applicable law transposing Directive (EU) 2019/1937 and in line with local whistleblower protection laws. Whistleblowers who report in good faith will not be subjected to any kind of disadvantage (for more information on the complaint procedure, see  $\rightarrow$  Chapter ESRS G1 – Corporate Governance/Whistleblower System and Protection). To date, there has been no research into the extent to which end consumers know and trust the procedures and structures.

S4-4 – Actions related to material impacts, approaches to managing material risks and pursuing material opportunities and effectiveness of those actions

#### Actions concerning product safety

For Südzucker Group, the safety of their entire product portfolio is of utmost priority. Quality management systems are implemented in all areas of Südzucker Group to ensure that our products comply with legal requirements and meet the needs of customers and end consumers. These processes encompass every area from management responsibility, product development, procurement and production to marketing and sales. Quality management systems are crucial for the management of product safety-related IROs 1-S4 and 2-S4. The following examples of core actions are part of the existing quality management systems, which are thus usually designed to be continuous and regularly renewed or repeated.

The review of our processes and products by external certification organizations is key for both Südzucker Group and its customers. Accordingly, our food quality management systems are geared toward internationally recognized standards with extensive specifications and standardized assessment processes. The normative framework is provided by the Global Food Safety Initiative (GFSI) benchmarking and validation system. Certifications recognized by GFSI and used within Südzucker Group include FSSC 22000, IFS Food, BRC Global Standard Food Safety and SQF. All Südzucker Group food production facilities have at least one such certificate; several production facilities have multiple certifications. The feed production facilities have certificates of internationally recognized feed safety standards GMP+International, QS Quality and Safety and FEMAS. Certifications are renewed upon expiry to meet customer requirements.

It would not be possible to produce safe, high-quality products without skilled employees who identify with corporate objectives. This is why further certifying and qualifying employees through regular training and instruction plays such an integral part in the quality management systems specific to each division. The employees are also regularly informed about food safety through a magazine, newsletters and other internal communication channels, including the intranet, to heighten awareness of the topic. Location-based operations pertaining to food safety are also carried out. In fiscal 2024/25, for example, activities were conducted to commemorate World Food Safety Day, including workshops and seminars on safety culture, as well as safety days.

The effectiveness of the actions is assessed by appropriate key figures within the scope of quality management (e.g., the development of the number of product recalls in recent years).

The material risk of liability claims and reputational damage due to safety deviations (5-S4) is linked to the potential material impact of our business activities on end consumers (2-S4). In this context, the policies and core actions mentioned in the previous sections, which we use to address the material impact, also help to mitigate the material risk. Südzucker Group's existing risk management procedure includes the risk 5-S4.

## Actions related to conscious consumption

In connection with the topic of nutrition, we have identified a material negative impact (3-S4) and a material positive impact (4-S4). To address these impacts, we are implementing the following core actions:

As part of our focus area of conscious consumption, we have launched a pilot project to assess the sustainability performance of our products and to increase transparency about the features of our products. A scorecard is being designed for specific products to evaluate them across four dimensions: Quality, sustainability, nutrition and innovation. The nutrition dimension impacts the IROs 3-S4 and 4-S4. A binding key figure should be defined for each category for all products to be evaluated. Simultaneously, additional division-specific indicators will be developed for each dimension to reflect the product diversity of Südzucker Group during assessment. In the area of nutrition, both the nutrient profile and claims related to health and nutrition are considered. A working group is currently developing the criteria for the scorecard. The initiative is initially planned to last until 2030 and includes the sugar (Südzucker), BENEO, Freiberger and PortionPack divisions, as well as AGRANA.

The main target is to market sugar and sugar specialties. Regarding the product portfolio, we also collaborate with our customers in the sugar division (Südzucker) on concepts for innovative sweetening solutions in products. The goal is to replace part of the sugar with other products according to customer preferences, without compromising the positive taste experience of the final product. During the 2024/25 business year, sugar-reduced fondants were developed to reduce the sugar content in the final product and improve its nutritional profile, thereby promoting conscious consumption. In fiscal 2024/25, work also continued on the development and use of dietary fiber to reduce sugar. We aim to expand our portfolio of liquid sugar substitutes with a dry-form product to broaden the range of applications.

The BENEO division is continuously working to maintain and expand the approved health and nutrition claims for its products. In fiscal year 2024/25, BENEO provided its customers with 14 approved health claims and 16 nutrition claims that they can choose to convey health and nutritional benefits to consumers. BENEO commissions and carries out scientific work and documentation in order to pass the strict approval process for these claims. This is to prevent consumers from being misled by claims regarding the health benefits of a product that are inaccurate, overly vague or insufficiently substantiated. To achieve these goals, the BENEO institute employs experts in nutrition and food law to support BENEO's customers in the development of new products and to facilitate product innovations based on scientific findings. The approved health and nutrition claims are renewed after expiration to meet customer requirements.

Other divisions of Südzucker Group also offer customers technical advice and support in product development, for example to improve the nutritional profile of products. The corporate department of research, development and services, with three development centers in Germany, Belgium and Austria is particularly active in the food sector. The aim is to promote innovations in the nutrition sector and to bring them to market together with customers and additional external partners. The projects vary in duration.

Another crucial step is the ongoing search for and collaboration with food industry start-ups, exemplified by the EIT Food Accelerator Network and MassChallenge Switzerland. Additionally, Südzucker Group operates its own open innovation platform, "the-Barn", where startups can directly submit their ideas. In addition to their operational business, Südzucker Group companies are focusing on "functional proteins" and "new sweetening solutions" as key areas for collaborations with start-ups. Furthermore, "Mission KickStart!" is an internal training and coaching program designed to identify promising projects and speed up collabora-

tion between the various divisions of Südzucker Group and startups. In the 2024/25 financial year, the program entered its third round.

In fiscal year 2024/25, Südzucker Group companies also supported programs that promote a healthy lifestyle and physical activity. For example, a charity bike tour across Europe and a project to promote physical activity for people with disabilities received support. We promoted a large number of projects across all divisions to support sports clubs and aid organizations near our locations.

The effectiveness of nutritional measures is not systematically assessed. No other actions are in place that primarily serve to make a positive contribution to better social outcomes for end consumers.

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# Process for identifying actions

The management reviews, conducted on a regular basis, assess the effectiveness of the quality management systems. This includes identifying potential vulnerabilities and their impacts. This is how complaints, among other matters, are evaluated. If a negative impact on customers or end consumers is identified, an internal assessment of the severity and the extent of the impact on the customers or end consumers is carried out. Based on the investigation results, an action plan will be created if necessary, which includes specific prevention or remedies. Subsequently, the implementation is monitored and its effectiveness is evaluated. Product recalls confirm the effectiveness of the actions taken.

The management review also includes an evaluation of the quality processes, which may also result in improvement measures. The scope includes conducting internal and external audits, customer satisfaction status, recall and crisis testing, HACCP and food defense effectiveness and supplier monitoring. Customer satisfaction surveys are also conducted within the scope of quality management and the appropriate steps are taken based on this information.

We also regularly monitor industry, market and nutrition trends at the divisional and group levels, which could affect our customers and consumers. Another approach we take to implementing the necessary actions is to work with our customers on product innovations and product customizations. Employees are encouraged to make suggestions for improvements to help optimize existing processes as part of the company's ideas management system.

We deploy human resources, such as experts in food safety and food law, to implement the actions.

# **Targets and metrics**

S4-5 – Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities

Currently, Südzucker Group lacks any measurable group-wide objectives concerning product safety. The topic is managed at the divisional level.

In the context of the topic of nutrition, appropriate key figures to assess our progress are currently being developed as part of the focus area of "conscious consumption". Based on a pilot project initiated in the 2024/25 financial year, a corresponding target will be set at a later date.

In fiscal 2024/25, two recalls of products manufactured by the Südzucker Group affecting end consumers had to be carried out.





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# Governance information ESRS G1 — Business conduct policies and corporate culture

Good business conduct and compliance with laws and internal policies is an integral part of Südzucker Group's successful and sustainable business activities.

Our company's guiding principles, encompassing our "Purpose", "Mission" and "Vision", serve as a compass and are the foundation for Südzucker Group's 2026 PLUS corporate strategy. Our Vision is to become the leading integrated corporate group for plant-based products and solutions — locally, regionally and globally.

Our actions and conduct are guided by our guiding principles and other corporate principles. Part of this includes our corporate values of "responsibility, creativity, respect and cooperation", which were developed in close collaboration with our employees and are are part of our corporate culture. Moreover, we have established the leadership principles "Respect, Responsibility, Participation, Development and Goal Orientation" for Südzucker Group. Compliance violations are not tolerated by the executive board and can lead to consequences up to and including employment-related repercussions. The executive board and managers also have an important role to play as role models and multipliers.

# ESRS 2 SBM-3 – Material impacts, risks and opportunities

Südzucker Group has performed a double materiality assessment in accordance with ESRS 1 to identify material impacts, risks and opportunities (IROs).

# Material impacts, risks and opportunities (IROs) related to business conduct

Material sub-topics	IRO	Short description	Category	Actual/ potential	Value chain	Origin	Time-horizon
	1-G1	Promoting a positive corporate culture to achieve common goals	Positive impact	Actual	Own operations	Südzucker Group	Medium-term Long-term
	2-G1	Damage to reputation, fines and penalties due to violations of legal requirements	Risk	-	Own operations	Südzucker Group	Short-term Medium-term Long-term
Corporate culture	3-G1	Increasing competitiveness by improving sustainability performance	Opportunity	_	Own operations	Südzucker Group	Medium-term Long-term
	4-G1	Increasing attractiveness as an employer through a positive corporate culture	Opportunity	-	Own operations	Südzucker Group	Medium-term Long-term
Protection of whistleblowers	5-G1	Insufficient protection of whistleblowers	Negative impact	Potential	Upstream value chain Own operations Downstream value chain	Südzucker Group	Short-term Medium-term
	6-G1	Adverse effects on the health and well-being of farm animals	Negative impact	Potential	Upstream value chain	Freiberger	Short-term Medium-term
Animal welfare	7-G1	Adverse effects on the health and well-being of laboratory animals	Negative impact	Potential	Own operations	Südzucker Group	Short-term Medium-term
	8-G1	Health benefits for animals through our products	Positive impact	Actual	Downstream value chain	BENEO	Medium-term Long-term
Political infuence and lobbying activities	9-G1	Negative impact of political decisions on business activities	Risk	_	Own operations	Südzucker Group	Medium-term Long-term
Management of relationships with suppliers	10-G1	Partnership-based collaboration with beet growers as part of contract farming	Positive impact	Actual	Upstream value chain	Sugar segment	Short-term Medium-term Long-term
Corruption and bribery	11-G1	Damage to reputation in the event of violations of legal regulations regarding corruption and bribery	Risk	_	Own operations	Südzucker Group	Short-term Medium-term Long-term

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Our materiality assessment in the area of corporate governance revealed the following material sub-topics: Corporate culture, protection of whistleblowers, animal welfare, political influence and lobbying activities, management of relationships with suppliers, including with anti-corruption and anti-bribery. The following is a more detailed description of the IROs identified as material in the area of business conduct for Südzucker Group together with an explanation of their connection to the corporate strategy and business model.

Our positive corporate culture, rooted in common values and open communication, helps us to achieve our overarching goal: of harnessing more power from the group. Employees are empowered to make informed and ethical decisions. This happens through the development of awareness, training, and the leadership example set by the executive board and management (1-G1). The positive corporate culture also contributes to Südzucker Group's attractiveness as an employer. Younger staff members, especially, place significant emphasis on values and principles in leadership (4-G1).

As a responsible and ethical business partner, we are consistently improving our sustainability performance, which is evident in the enhanced sustainability ratings. These efforts have strengthened the company's competitiveness, as investors, banks and customers are increasingly emphasizing the importance of sustainability and ethical behavior. A solid sustainability rating, for instance, can enhance capital access (3-G1).

Even with all the measures in place, however, there is still a risk that Südzucker Group employees may violate legal requirements, resulting in penalties or fines that could have a negative impact on the company's financial results. In addition, damage to reputation

may occur (2-G1). There is also a risk of corruption within the group's own operations in certain instances, which cannot be entirely eliminated even with an effective compliance management system and may lead to reputational damage (11-G1).

Südzucker Group maintains a robust whistleblower system that is constantly evolving. Yet, within our global business environment, the possibility that some whistleblowers may not be adequately protected cannot be entirely ruled out (5-G1).

The BENEO division develops and produces specialty plant-based ingredients such as prebiotic dietary fiber, digestible carbohydrates and vegetable proteins that help improve the health of humans and animals, including pets (8-G1). Nutritional claims are indispensable for the marketing of these products. For this reason, we are proceeding with thorough scientific studies on Palatinose™, inulin and oligofructose, among other subjects. The focus is on topics such as improved blood glucose management, metabolic regulation, intestinal health and protein value information.

We commission research studies to examine the nutritional properties of some of our products and to prove the health benefits. Animal testing is mandatory in numerous countries for food ingredients and new food additives to guarantee product safety. This may also matter to BENEO. Other necessities for animal testing may arise for us, for example, from REACH¹-approvals. We cannot completely rule out the possibility of adverse effects on the health of the laboratory animals used for the studies (7-G1).

Freiberger is the only division of Südzucker Group that uses products of animal origin. For this purpose, Freiberger sources beef, pork, and poultry, fish (especially tuna), eggs, and dairy products (especially cheese) from traders and processors. These products

are not acquired directly from farmers. In the deeper supply chain, animal husbandry that is not species-appropriate and fails to meet the specific needs of the animals in terms of feeding, space and care can result in adverse effects on the health and well-being of the animals. Violations of the Animal Protection Act cannot be completely ruled out either. Moreover, our suppliers outside the EU are generally subject to less stringent legal requirements regarding animal welfare (6-G1).

Negative impacts of political decisions on the business activities of Südzucker Group can arise from changes in the legal and political environment, particularly at the national and European level (9-G1). The introduction of sugar taxes, for example, could lead to a decline in the total consumption of foods containing full-calorie sweeteners.

The origins of Südzucker Group can be traced back to 1837, with the construction of the former Waghäusel sugar factory. The processing of sugar beets has been tightly tied to the company since that time. We have a partnership-based collaboration with our beet growers as part of contract farming (10-G1). This applies particularly to beet growers in southern Germany, who hold a majority stake in the company through the Süddeutsche Zuckerrübenverwertungs-Genossenschaft (SZVG). Today, around 27,000 beet growers in Europe supply sugar beet to Südzucker Group. We are in close cooperation to guarantee the supply of sugar factories and collectively create tools and recommendations for a more efficient and sustainable beet production. Serving as the link between farmers and our customers, our objective is to provide greater recognition and fair remuneration for our farmers, thereby creating a solid basis for meeting the rising demand for sustainably produced food.

<sup>&</sup>lt;sup>1</sup> REACH: Registration, Evaluation, Authorisation and Restriction of Chemicals.

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# Impact, risk and opportunity management

# G1-1 – Corporate culture and business conduct policies and corporate culture

## Compliance management system

Compliance with laws and internal policies is the foundation of good business conduct. The aim is to establish a strong compliance culture that helps to promote a positive corporate culture (1-G1) and effectively prevent and minimize misconduct by employees and company bodies — as well as the associated potential economic, legal and reputational negative impacts or risks (2-G1, 5-G1 and 11-G1). This also contributes to seizing the material opportunities in the area of corporate culture (3-G1 and 4-G1).

The executive board and management at Südzucker Group should exemplify behavior and communication that establish a setting that clearly underscores the significance of compliance within the organization. The executive board of Südzucker AG is tasked with ensuring legal compliance and thus oversees compliance, with the CEO of Südzucker AG being in charge of the compliance division.

Südzucker Group encompasses three stock companies, each overseeing its own compliance management system (CMS): The Südzucker CMS includes Südzucker AG and all subsidiaries except for CropEnergies AG and AGRANA Beteiligungs-AG with their associated companies. The CropEnergies CMS comprises CropEnergies AG along with its associated companies. The AGRANA CMS consists of AGRANA Beteiligungs-AG and its associated companies. Internal CMS policies provide the basis for the above-mentioned CMS.

Each CMS listed is managed by its own compliance officer within the respective parent company. This also includes, for example, responsibility for the creation of internal company policies as part of the respective CMS, as well as policies on whistleblower protection and compliance training, including their implementation. Internal directives and policies on whistleblower protection are being continuously updated. The education plans, training materials, languages available and the target user group are regulary reviewed and further developed.

Furthermore, each of the specified CMS appoints additional compliance officers at the division or subsidiary level. The specified compliance officers or compliance representatives mainly perform preventive compliance functions as part of their work. They are also responsible for ensuring compliance with national and international laws, Südzucker Group's internal policies and international standards within their area of responsibility. The compliance representatives are required to report both annually and immediately in case of group-relevant compliance incidents to the designated compliance officers. An ongoing exchange takes place throughout the year between the compliance officers, during which, among other things, the implementation of internal training policies is monitored.

Moreover, a compliance committee has been set up at the Südzucker CMS and a compliance board at AGRANA CMS, which provides advice to the respective compliance officer on compliance issues and meets on a regular basis. There are separate rules of procedure for both committees.

The following policies and core topics exist in all three CMS:

## - CMS policies

According to the existing policies, the respective executive boards of Südzucker AG, CropEnergies AG and AGRANA Beteiligungs-AG provide a regulatory framework for the respective CMS, set out its structural and procedural organization and specify responsibilities and tasks. The focus of the CMS is on preventing compliance risks that may arise from misconduct by the board, management, executives, employees or external partners. The objective is to effectively prevent potentially adverse economic, legal, and reputational impacts (2-G1 and 11-G1) and to foster a robust compliance culture.

# Policies on whistleblower systems

The policies for existing whistleblower systems serve to summarize the whistleblower protection system and to provide clear and comprehensible information about accessibility, responsibility and procedure implementation. This contributes to avoiding potential negative effects in whistleblower protection (5-G1) and mitigating the risk of potential fines and damage to reputation (e.g., 11-G1).

# - Policies for handling donations and conflicts of interest

These policies include binding regulations for dealing with invitations and gifts (including those related to public officials) as well as conflicts of interest and define an approval process. They help mitigate risks within corporate culture such as damage to reputation, fines and penalties due to violations of legal requirementsr (2-G1) and issues relating to corruption and bribery (11-G1).

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### Antitrust compliance policies

The existing antitrust compliance policies are intended to ensure that employees and company bodies are familiar with and adhere to the fundamental rules of competition and antitrust law, as well as being sensitized to recognize antitrust-relevant issues. The purpose of these directives is to protect employees from legal violations in antitrust law and to provide practical support in applying the relevant regulations. They help mitigate risks within corporate culture such as damage to reputation, fines and penalties due to violations of legal requirements (2-G1).

#### - Data protection policies

The data protection policies of Südzucker AG, CropEnergies and AGRANA Group are the mandatory basis for legally compliant and sustainable protection of personal data. These policies take precautions to safeguard the fundamental rights and freedoms of individuals, in particular the right to protect personal data. By being an integral part of corporate culture, they help to reduce risks within corporate culture such as damage to reputation, fines and penalties due to violations of legal requirements (2-G1) and to protect the company from liability risks and reputational damage.

# Sanction list checks with regard to business partner master data

Business partner screening is a crucial tool for preventing financial crimes. System-supported sanctions list checks of master data of business partners and financial institutions against a standardized database take place in all three CMS. A corresponding policy was issued as a foundational measure, which, among other things, regulates the details of the sanctions list check and helps to reduce risks within corporate culture such as damage to reputation, fines and penalties due to violations of legal requirements (2-G1) and to protect the company from liability risks and reputational damage.

Due to the stock exchange listing of Südzucker AG and AGRANA Beteiligungs-AG, the following policy also exists in their CMS:

#### - Capital market compliance policies

Südzucker AG and AGRANA Beteiligungs-AG, as publicly listed companies, have issued capital market compliance policies to implement stock exchange and capital market regulations. They govern the principles for the disclosure of information and set out organizational actions to ensure confidentiality and prevent the misuse or disclosure of insider information, among other things. They contribute to minimizing risks in corporate culture, such as violations of legal requirements (2-G1). The required insider lists and documentation are each managed and maintained under the responsibility of the compliance officer at Südzucker or AGRANA.

#### Code of conduct

The code of conduct also serves as the foundation for Südzucker Group's interaction with employees and for the employees' behavior towards each other and towards external persons. It applies to the entire group — excluding AGRANA — and combines applicable laws with international standards, operational regulations, corporate policies, as well as duties from the employment relationship towards Südzucker. As a publicly listed company, AGRANA has its own code of conduct, which considers and applies the content of Südzucker Group's code of conduct. Compliance can only be successful if all employees align their actions with the core principles of the code of conduct. Therefore, everyone shares the responsibility of observing and implementing these values in their daily work.

In fiscal 2024/25, we updated Südzucker Group's code of conduct and communicated the new version to our employees across various channels. Compliance training sessions raise employee awareness about the code of conduct and its crucial compliance topics. The code of conduct is available to our employees on the intranet and publicly on our website in various languages. Compliance with our code of conduct is supported by the whistleblower system. Parts of the code of conduct are included in both planned and incident-related reviews by internal auditing.

Our code of conduct has been drawn up to help us act responsibly, appropriately and in compliance with the law in our daily work. It contributes to promoting a positive corporate culture (1-G1) and to preventing possible violations of legal requirements (2-G1 and 11-G1). Compliance with our code of conduct, as well as legal regulations and internal corporate policies, is an essential part of the company's image as a credible and reliable partner.



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Südzucker Group's code of conduct sets out clear directives on the following principles in the corresponding subsections:

- We are committed: with each other and with our contacts.
- We treat our employees fairly and with respect.
- We act responsibly towards our environment.
- We maintain integrity in our business transactions.
- We stand for product quality and safety.
- We protect our information.
- We communicate transparently and correctly.

For more information on the code of conduct, refer to  $\rightarrow$  ESRS S1 Own Workforce/Policies related to own workforce.

## Whistleblower system

Südzucker Group has mechanisms in place for reporting, identifying, documenting and investigating concerns about illegal behavior or conduct that conflicts with our code of conduct.

Employees, subcontracted workers and our business partners can report potential misconduct using the existing reporting channels. The whistleblower system was implemented specifically in accordance with the requirements of the EU Whistleblower Directive 2019/1937, the Whistleblower Protection Act (HinSchG) and the Supply Chain Due Diligence Act (LkSG) and is continually being expanded. The policies for the whistleblower system in Südzucker AG's and CropEnergies AG's CMS, for example, are currently being revised, and the new versions will come into force in fiscal 2025/26. Südzucker Group and AGRANA codes of conduct include a reference to contact persons for potential misconduct and information on existing reporting channels. Employees can transparently access the contact details of the designated compliance officers, information on the whistleblower system, as well as links to the electronic reporting channels via the Südzucker or AGRANA intranet.

Whistleblower reporting is addressed in specific compliance e-learning sessions ( $\rightarrow$  section compliance training) and is also included in onboarding programs for new employees at Südzucker's headquarters in Mannheim and AGRANA's offices in Vienna.

It is possible to report misconduct in person, by telephone, through email, or by mail. However, whistleblowers can also submit reports via electronic reporting channels (compliance lines) that can be used anonymously and ensure the encrypted transmission of confidential information. Our system-supported whistleblower channels maintain anonymity through encryption and security measures certified by an independent body.

Currently, compliance lines are available for Südzucker Group, (https://www.bkms-system.com/suedzucker), the CropEnergies Group (https://www.bkms-system.com/cropenergies) and the AGRANA Group (https://www.bkms-system.com/agrana). The information can also be found on the respective company websites and is therefore also available to external third parties or, for example, employees without intranet access. Further compliance lines for divisions or affiliated companies, where legally relevant, are currently being set up. Compliance lines are regularly monitored. As part of the ongoing revision of the policy on the whistleblower system in the CMS of Südzucker Group, it is now being formally established that, in the future, if no reports are received through the whistleblower system for two months, test cases will be created to verify the system's functionality. This has already been common practice.

Recipients of whistleblower reports via the compliance lines are the compliance officers with expertise in the area of whistleblower protection, as defined in the existing Südzucker Group CMS systems. In fiscal year 2024/25, there was a change of compliance officer at both Südzucker AG and CropEnergies AG. The new officers have taken part in further training for compliance officers

and on the Whistleblower Protection Act in fiscal 2024/25. All appointed compliance officers within the CMS of Südzucker and CropEnergies are required to regularly participate in further training in compliance, including the protection of whistleblowers. The compliance officers appointed at AGRANA participate in regular training sessions as well. Moreover, the compliance officers within Südzucker Group regularly exchange information on compliance topics and local legislative changes.

All potential whistleblowers are free to report incidents in their own business area and in the Südzucker Group value chain through the available reporting channels. This includes violations of national and international laws, directives and other provisions. Reports can be submitted particularly in the following areas:

- Violations of internal policies, in particular, the code of conduct
- Financial crime (e.g., corruption, bribery, money laundering, terrorism financing, fraud, breach of trust, theft, embezzlement)
- Violations of competition law and antitrust law
- Violations of securities law including insider trading
- Violations of data protection regulations
- Violations of human rights (e.g., slavery, forced labor, child labor)
- Violations of environmental protection regulations
- Violations of labor law regulations including occupational health and safety, inequality in employment, e.g., due to age, gender, religion or other personal characteristics, harassment and bullying
- Incorrect accounting or financial reporting
- Violations of tax law regulations
- Other violations within the material scope of the locally applicable whistleblower protection law
- Other violations of national laws and EU regulations,
   e.g., consumer protection, food safety, animal welfare



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Reports that fall outside the personal or material scope of the whistleblower system will also be pursued with equal effectiveness and confidentiality.

Whistleblowers are encouraged to create a secure mailbox as part of compliance line reporting. This mailbox is intended solely for communication between the whistleblower and the respective responsible compliance officer or the local compliance officers of the affected divisions/subsidiaries. The entire communication process is strictly confidential and is based solely on the whistleblower's willingness to log into the system and answer further questions to clarify the facts of the case.

Südzucker ensures security and confidentiality with regard to the identity of the whistleblower when processing whistleblower cases. In cases where the report is submitted anonymously, personal details will not be sought at any stage of the procedure. The compliance officers in Südzucker Group's existing CMS are bound to secrecy.

If contact with the whistleblower is possible, they will receive confirmation of the receipt of their reports within the legal time limit.

Upon receipt of a report, an initial review is promptly conducted in an independent, objective and confidential manner. If an initial review reveals a sufficient and circumstance-based initial suspicion related to the company, a further case-specific investigation, if necessary, will be conducted anonymously. For anonymous reports, this might be especially thorough to effectively mitigate the heightened risk of possible misuse of Südzucker Group's compliance lines, for example.

The processing of the case is conducted confidentially and in accordance with data protection laws. Employees involved in case processing are reminded of their duty of confidentiality and are instructed not to request personal information in anonymous tips or to attempt to directly or indirectly deduce the whistleblower's identity. Once the legally required retention period has passed, the person in charge of a whistleblower channel anonymizes the personal data.

If the matter is found to be justified during the discussion, appropriate follow-up actions will be taken on a case-by-case basis, and these will be tracked by the responsible compliance officer if necessary.

Feedback to the whistleblower is provided within the legally applicable timeframe. Such action is taken only to the extent that it does not interfere with ongoing internal investigations and does not infringe upon the rights of individuals who are the subject of a report or mentioned in the report. If a personal mailbox was set up in the respective compliance line when the report was submitted, the feedback can be retrieved there. If this is not the case or the whistleblower has not disclosed any other contact address, this may result in no feedback being provided to the whistleblower.

Reports from whistleblowers concerning compliance issues, including allegations of corruption or bribery, are immediately forwarded to the CEO of Südzucker AG in Südzucker's CMS and, if necessary, to the relevant management board responsible for the division or company at Südzucker AG. The informed board members are continuously updated on the status of the respective suspected cases, and if necessary, any actions to be taken are coordi-

nated with them as well. Biannual reports are submitted to Südzucker AG's executive board regarding whistleblower cases within Südzucker Group during the previous half-year, including those suspected of corruption or bribery.

The board member responsible for compliance at Südzucker AG, CropEnergies AG and AGRANA Beteiligungs-AG reports annually on compliance to the respective audit committee and supervisory board. This also includes a report on whistleblower cases from the past fiscal year, including those suspected of corruption or bribery.

The whistleblower system and the whistleblower protection described below help to avoid the potential negative effects of protection of whistleblowers (5-G1) and mitigate the risks of potential fines and damage to reputation (e.g.: 11-G1).

Details on Südzucker Group's whistleblower system and the management of complaints are available in  $\rightarrow$  ESRS S2 – workers in the value chain.

Südzucker Group has policies in place for combating corruption and bribery in the form of the procedures and directives described (CMS, whistleblower system, code of conduct, training, etc.), supplemented by internal group policies for dealing with donations, public officials and conflicts of interest. This also includes policies that align with the United Nations Convention against Corruption (UNCAC).

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#### Whistleblower protection

TO OUR SHAREHOLDERS

The primary principle of our whistleblower system is the protection of the whistleblower in accordance with the applicable law transposing Directive (EU) 2019/1937 and in line with local whistleblower protection laws. This is also integrated into our internal policy for the whistleblower system. Südzucker Group's whistleblower system is to be used responsibly. It must not be misused to defame others or make false claims. Therefore, only information that the whistleblower is convinced is correct to the best of their knowledge and belief should be disclosed. Whistleblowers submitting reports in good faith will face no disadvantages, provided they adhere to the local legal requirements for effective whistleblower protection within their reports.

Südzucker Group will not tolerate any reprisals, sanctions or other retaliatory measures, or the threat or attempt thereof, by Südzucker employees against a whistleblower who has reason to believe that a violation existed at the time of reporting. No employee should experience drawbacks as a result of a report. Südzucker clearly states that reports made accordingly will not affect the employment, career opportunities, professional future or tasks of whistleblowers employed by Südzucker.

Protection against reprisals for whistleblowers employed at Südzucker also extends to persons associated with the whistleblower, who may face retaliation due to a possibly close connection, such as familial or similarly close ties. Individuals who assist the whistleblower in a professional context when reporting are also protected. In addition, the whistleblower is granted immunity from liability for breaching any confidentiality obligations that may exist between the whistleblower and Südzucker in connection with a report to Südzucker. The whistleblower cannot be held legally responsible for the procurement of or access to information that has been reported, unless the

procurement or access itself is a criminal offense. However, Südzucker's legal influence is limited, and so the whistleblower's protection can only be guaranteed within those limits.

Our whistleblower system is not intended to capture deliberately false or malicious accusations. If the whistleblower has intentionally or through gross negligence provided untruthful or inaccurate information, Südzucker will not provide protection against reprisals. In this case, Südzucker reserves the option to proceed with disciplinary and/or criminal or civil legal action. Specific local legislation may give rise to additional scenarios where whistleblowers might not have protection under the law. In the Czech Republic, for instance (where subsidiaries of the AGRANA Group and the PortionPack division are located), local legislation stipulates that whistleblowers have no legal protection if their report does not include the whistleblower's first name, last name and date of birth or other data which could disclose their identity.

## Initiatives regarding animal welfare

We established a company-wide guideline in 2023 to manage animal testing, focusing on addressing our potential negative effects in this area (7-G1). A key area is products whose health benefits must be scientifically proven in order to enable a corresponding claim (8-G1). The ongoing focus of BENEO's business activity is the development and expansion of the portfolio to incorporate more ingredients that offer additional health benefits for animals. There is no implemented policy for this. To this end, two studies on dog feeding and one on bee feeding were commissioned in fiscal 2024/25. Our studies aim to examine the nutritional properties of our products that offer health benefits.

We are committed, through our policy on animal testing, to upholding regulatory minimization strategies for animal testing and ensuring a high level of protection for laboratory animals. This encompasses the 3-R principle, which centers on the actions: Replace, Reduce, Refine.

Südzucker Group avoids animal testing wherever it is permissible from a regulatory perspective. Requirements can, for instance, stem from REACH approvals and the CLP regulation regarding the classification, labeling, and packaging of substances and mixtures, or from the investigation of the physiological characteristics of animal feed. Animal testing is mandated in numerous countries for food ingredients and new food additives to guarantee product safety. Südzucker Group ensures that the necessary animal testing and research are performed following the international ISO 23662:2021 standard for vegetarian and vegan food items. Animal testing of (new) food ingredients and food additives is a crucial aspect of the regulatory requirements in many countries to ensure the required food safety.

There is currently no group-wide process in place to implement the guideline for dealing with animal testing and monitoring it. The guideline was shared with the relevant company functions.

Sustainability is increasingly emphasized in the supply chain of the Freiberger division, the only division within Südzucker Group utilizing animal products, to address potential negative effects (6-G1). For example, Freiberger intends to use only dolphin-safe tuna and/or tuna with the Marine Stewardship Council (MSC) seal. Freiberger also has organic certification and produces organic pizzas with animal products from ecological farming.

Freiberger is working on a purchasing policy that will establish principles for sustainable procurement, including that of animal products. The policy is to be adopted and rolled out in the 2025/26 fiscal year.



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### Compliance training

Every year, employees in Südzucker Group are required to complete e-learning courses on compliance. This training is currently defined as being for active employees, including board and management <sup>1</sup>, with IT access and who work in functions within our organization that are most at risk in terms of corruption and bribery. Functions in the executive board and management, procurement, sales, mergers and acquisitions, and public relations are especially at risk for corruption and bribery.

There are currently five compliance e-learning modules available in both the Südzucker CMS and the CropEnergies CMS. Fair competition, capital market compliance, fraud by identity theft, protection against corruption and compliance principles (including all of the above topics). Completion of these modules is mandatory, and they change annually. The AGRANA training program consists of a yearly compliance e-learning module, which covers the topics outlined above. Our e-learning modules encompass interactive practice cases and scenarios, with references to internal policies and contacts. The e-learning compliance essentials and the AGRANA e-learning modules, for example, also include details of the whistleblower system. Employees are also given control questions to help them assess potentially problematic or risky situations more easily. Employees need to pass a test at the end of the compliance e-learning to finish the training successfully.

In fiscal 2024/25 approximately 7,087 employees including the executive board were trained throughout the company. This represents about 93 % of the target group – active employees, including the executive board and management staff with IT access.

During the training schedule for the 2024/25 business year, 90 % of the functions deemed risky regarding corruption and bribery successfully completed our compliance training sessions.

Board members and management team members are required to complete our compliance e-learnings annually. Members of the supervisory board at AGRANA undergo annual training. Südzucker Group's supervisory board employee representatives also participate in annual compliance e-learning sessions, whereas the other board members have not received such training so far. We aim to provide in-person training on compliance and corruption to the board and the entire supervisory board at least once every two years. The respective compliance officer is responsible for implementing the compliance training programs.

Furthermore, onboarding programs for new employees at the headquarters of Südzucker and CropEnergies in Mannheim and AGRANA in Vienna include in-person training on compliance. These sessions address the topics mentioned above and aim to increase compliance awareness. AGRANA also offers specialized training for employees in the risk areas of sales, mergers and acquisitions, and procurement.

The implemented compliance training courses help mitigate potential negative impacts or risks related to corporate culture (2-G1), whistleblower protection (5-G1), and corruption and bribery (11-G1), while also strengthening the positive impacts (1-G1).

# G1-2 – Management of relationships with suppliers

We maintain a long-term, trust-based partnership with beet growers as part of our contract farming (10-G1) arrangement. About 27,000 beet growers in Europe supply sugar beets directly to Südzucker Group and its subsidiaries. Current and former beet growers from Germany own shares in our company through the Süddeutsche Zuckerrüben-Verwertungsgenossenschaft (SZVG).

Europe's leading sugar producer, Südzucker Group, acquired more than 29 million tonnes of sugar beets in fiscal 2024/25, sourced entirely from European production.

The procurement of beets takes place within the framework of contract farming directly from farmers within a radius of about 80 km around our sugar factories. Annual sugar beet supply contracts are concluded, which establish the conditions for beet deliveries as well as the rights and obligations of both contracting parties, including the beet prices for the respective sugar campaign. The price paid for the sugar beets is derived from the revenue of the final product, sugar. Our goal is to ensure that farmers benefit from the company's economic achievements. The timing of payments by Südzucker or AGRANA is also explicitly outlined in the supply contract. The central treasury teams at Südzucker and AGRANA plan and coordinate payments before the respective payment deadlines. Payment dates are stored within the system, and the finalized payment run is communicated to the respective banks one day before the due date with the specific execution date.

<sup>&</sup>lt;sup>1</sup> Employees on parental leave, partial retirement or long-term sickness are not included in the defined group of persons.

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The contracts for supply require beet producers to follow cultivation procedures in line with good professional practice, among other obligations. Accordingly, for example, plant protection measures should be carried out in accordance with the guidelines of integrated plant protection, only genetically unmodified seeds may be used, and growers must maintain field documentation. Furthermore, the growers commit in the supply contracts to cultivate sugar beets on a field no earlier than every third year to maintain soil health. Considering that cultivation is carried out exclusively in the European Union, except in the case of Moldova, it adheres to the cross-compliance standards required for agricultural production in the EU.

Südzucker also sources organic sugar beet. The cultivation is carried out in accordance with the EU Organic Farming Directive and the directives of the organic farming associations Bioland, Naturland, Biokreis, Gäa and Demeter.

We source a predominant portion of our sugar beets while adhering to ecological and social sustainability criteria according to the so-called Farm Sustainability Assessment (FSA) of the Sustainable Agriculture Initiative Platform (SAI). Südzucker and its sugar beet growers were again able to demonstrate adherence to the SAI sustainability criteria in 2024 by receiving the RedCert<sup>2</sup> certificate. In fiscal 2024/25, FSA Gold status – the highest FSA rating for sustainability – was achieved once more in Germany, Belgium, France and Poland. Within AGRANA, all farmer groups, with a few exceptions, achieved FSA Silver status or higher. Currently, only sugar beet cultivation in Moldova is not covered by SAI. We are currently working on an approach to change that.

Contract farming allows us to directly and jointly improve sustainability aspects in the supply chain with our beet suppliers. We are researching modern and sustainable cultivation methods, for example, in the Board of Trustees for Sugar Beet Trials and Advice, supported by Südzucker and the growers' associations, and are conducting joint experimental projects.

A further example of partnership-based cooperation is the SBR task force, which was established by Südzucker and the growers' associations. It coordinates research and trial topics for combating the beet diseases SBR (Syndrome Basses Richesses) and Stolbur, which are spreading in Germany and other regions, detrimentally affecting beet quality and yields.

We also launched an initiative in fiscal 2024/25 called "The Connected Collective" to promote regenerative agricultural practices in sugar beet cultivation through collective efforts along the entire value chain. As part of the initiative, we aim to collaborate with our beet growers and customers to make beet cultivation more sustainable. A project embodying the new approach was initiated in Belgium in 2024. We incorporate the expertise of farmers to develop feasible solutions for reducing  $\mathrm{CO}_2$  emissions in agriculture.

# G1-3 – Prevention and detection of corruption and bribery

Prevention is a fundamental part of a compliance management system. Südzucker Group regularly conducts training programs to promote legally compliant and ethically appropriate behavior among its employees and minimize the risk of corruption and bribery. These programs are designed to heighten awareness and understanding of corruption and bribery risks and refer to applicable internal policies. Our compliance e-learning modules

cover a wide range of topics: Explanations are given on the meaning of corruption, the understanding of advantages and benefits, what is appropriate or inappropriate, and the particular approach to dealing with public officials is discussed. Further details on training measures, including the percentage of functions at risk covered by training programs and the extent to which training is provided to members of the administrative, management and supervisory bodies, are set out in the  $\rightarrow$  section "Compliance training".

As part of the roll-out of the updated Südzucker Group code of conduct, "corruption and bribery" is a core topic that we intend to address on an ongoing basis via the available communication channels even after the roll-out.

Supervisors of employees in "at-risk functions" are also required to regularly educate their employees on the issue of corruption, for instance during yearly evaluations.

The Südzucker intranet offers employees concrete advice on actions to take, including policies on the acceptance and provision of gifts and invitations, and on managing conflicts of interest. Specific provisions regarding the points mentioned above are also set out in Südzucker and CropEnergies' policies for dealing with donations and conflicts of interest (courtesy directive). The mentioned points are reflected in AGRANA's country-specific anti-corruption policies and conflict of interest policies.

We are consistently striving to make sure our policies are communicated, understood and executed following their release. We disseminate our policies, including those for the prevention and detection of corruption, through various channels such as Sustainability statement

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internal newsletters, internal circulars, training sessions and our intranet pages. Our executives are expected to function as multipliers, ensuring their staff are informed about and have access to the policies pertinent to them. Policies are generally available in multiple languages. The Südzucker and AGRANA codes of conduct also refer to existing internal policies. During the pre-Christmas period, the main compliance officers of the Südzucker, CropEnergies and AGRANA groups regularly send out reminders to adhere to the applicable courtesy policies. We regularly review our communication approaches and modify them as needed to guarantee their effectiveness and to satisfy the needs of our stakeholders.

Our whistleblower system also allows for the reporting of suspected cases of corruption or bribery. Südzucker Group's compliance officers are not subject to policies in their roles as compliance officers and investigators of reports from whistleblowers and have extensive rights to information. This is set out in writing in an additional agreement for the "compliance officer" role as part of the employment relationship.

The executive board, audit committee and supervisory board are regularly informed about reports from whistleblowers with compliance relevance, including those involving suspected corruption or bribery. For more information, refer to the  $\rightarrow$  section "Whistleblower system".

#### Metrics

## G1-4 – Incidents of corruption or bribery

# Incidents of corruption and bribery in Südzucker Group

Number of convictions for violation of anti-corruption and anti-bribery laws	0
Amount of fines for violation of anti-corruption and anti-bribery laws	0

No further action was taken as there were no convictions or confirmed cases related to corruption or bribery in the 2024/25 financial year. We have implemented and continue to develop preventive procedures such as whistleblower channels, compliance

training and communication activities on internal guidelines.

# G1-5 – Political influence and lobbying activities

The CEO of Südzucker Group is resonsible for and oversees activities in the domain of public affairs.

The objective of our donation policy is to act as a basis for Südzucker Group companies to independently offer assistance. Supportive measures are to be provided transparently and according to specific guidelines, and must be documented. This includes donations, memberships, and hospitality services. The donation policy applies to Südzucker Group with the exception of AGRANA. The donation policy at AGRANA is outlined in the anti-corruption policies.

In fiscal year 2024/25, monetary payments amounting to € 117,000 were made directly on behalf of Südzucker Group. These donations typically occur exclusively in the run-up to the German Bundestag elections. The evidence is provided within the accountability reports of the respective political parties.

Donations in kind were made to a negligible extent. Contributions in the form of cash or, for instance, vouchers, as well as regular contributions, are not allowed. Specific provisions are set out in Südzucker and CropEnergies' policies for dealing with donations and conflicts of interest (courtesy directive). The aforementioned points are reflected in AGRANA's country-specific anti-corruption policies.

Südzucker AG is listed in the Transparency Register of the European Union (Reg. No.: 740592710611-76) and in the Lobby Register of the German Bundestag (Reg. No.: R001956).



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No new member of Südzucker AG's executive board was appointed in fiscal year 2024/25. During this period, there was an instance in the supervisory board where an alternate member took over a position, having been elected as a substitute candidate to the supervisory board during the 2022 election of employee representatives. The new supervisory board member has not held a comparable position in public administration (including regulatory authorities) in the last two years.

Changes in the legal and political environment, particularly in the European Union, could potentially have a negative impact on our business activities (9-G1). We are engaged in a dialogue with politicians, institutions and non-governmental organizations in order to minimize this risk. Content positions are communicated through policy discussions, parliamentary breakfasts or the dissemination of position papers. Political talks are commenced either through active outreach by Südzucker AG or upon request from external decision-makers. The position papers are subject-specific content documents from Südzucker AG or an association whose position is substantively shared by Südzucker AG. The company oversees regulatory changes through in-house research, associations, and external consultants. We are not only a member of relevant industry associations but also committed to supporting their work through active participation. Here, too, our aim is to find practical solutions to regulatory issues.

The following is an overview of Südzucker Group's lobby positions associated with the material impacts, risks and opportunities identified in the materiality assessment in accordance with ESRS 1:

- Südzucker Group is seriously concerned about the potential negative health effects on consumers caused by the overconsumption of sugary foods. As a result, we fully endorse the goal of addressing overweight and obesity, along with the related health issues, in consumers. Still, the onset of obesity and overweight is complex, and the causes are varied. From the perspective of Südzucker Group, no single food is responsible for overweight. Key to the onset of overweight and obesity is an imbalance in the caloric equation. There is no evidence that the draft law announced by the BMEL for advertising regulation contributes to reducing the prevalence of overweight. Südzucker Group therefore considers the draft law to be disproportionate and rejects it. We also reject a sugar tax, actions to regulate advertising, and nutrition labeling models that focus on individual nutrients rather than calorie density.
- We are committed to ensuring that high-quality, safe and diverse food and staple foods are provided in our own business division for the downstream value chain. To this end, we are calling for the retention of the applicable regulations on processing aids in accordance with Regulation (EU) No. 2021/1165, the preservation of the use of pesticides for sugar beet cultivation and a practice-oriented design of, among other things, the "Standards for Good Agricultural and Environmental Conditions" (GAEC) and voluntary funding instruments such as the eco-regulations. For the stated objective, we advocate the use of new genomic techniques in plant breeding.

Südzucker Group is calling for the national implementation of the Renewable Energy Directive (EU) 2023/2413 in order to achieve almost complete energy utilization of the agricultural raw materials used in its own business segments. Moreover, Südzucker Group supports upholding the definition of "renewable energy sources" (including biomass and sewage treatment gas) in the Electricity Tax Act to secure the utilization of renewable energy sources in its business segments.



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# Annex to the sustainability statement

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