



**SUSTAINABILITY**  
REPORT  
**2024**



# Sustainability Report



# 2024

# Summary



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## ANNEX

# Letter from the Chairman

Dear Stakeholders,

I am pleased to present the eleventh edition of the INALCA 2024 Sustainability Report, which represents a significant milestone in our growth journey and reflects the company's growing commitment to key issues of sustainability.

The past year delivered significant results, despite a global context characterised by complexity, geopolitical tensions, and evolving economic dynamics, with revenues reaching the historic milestone of 3,235.1 million Euro.

This edition represents a significant step forward because INALCA – a Cremonini Group company – has voluntarily chosen to prepare its Sustainability Report according to the new European Sustainability Reporting Standards (ESRS), introduced as part of the Corporate Sustainability Reporting Directive (CSRD).

This decision demonstrates the Group's commitment towards strengthening its capacity for transparency, responsibility, and integrated reporting on environmental, social, and economic issues.

Livestock farming issues remain crucial for us, not only from an environmental perspective but also from an economic and social one, given the progressive decline in Italian beef production. The self-sufficiency rate, in fact, has fallen from 58% in 2010 to 40% in 2023, with the national bovine herd falling from 10 million head in 1961 to less than 6 million today.

To counter this trend, INALCA has continued to invest in the primary sector, focusing on consolidating agricultural activities through the modernisation of livestock farms and the construction of new, efficient facilities consistent with the principles of environmental sustainability and the circular economy. In 2024, an Agri-Livestock Hub was established, designating Azienda Agricola Corticella as the reference holding company for the primary sector in Italy, with 180,000 head of cattle raised directly or through agistment, and 3,200 hectares of land, both owned and indirectly managed, dedicated to the production of fodder for bovine, an essential element of livestock farming.

At the same time, international meat trading activities have increased to ensure quality products on the domestic and European markets. This has also included the consolidation of foreign subsidiaries, with a significant reinforcement of operations in Poland, driven by the full operation of the new plant and the completion of the beef supply chain, as well as the continued expansion of commercial activities in Africa, which offer significant market opportunities.

Finally, it is worth mentioning the significant growth in the cured meats and snacks sector, dominated by Italia Alimentari, which has now become the fifth largest operator in Italy, in an extremely fragmented market.

I would like to conclude by expressing my sincerest gratitude to all the people and employees of INALCA who, with dedication, competence, and team spirit, contribute every day to the achievement of our goals and the progress of the Cremonini Group.

Luigi Cremonini  
The Chairman

The Chairman





INTRODUCTIVE  
**SECTION**

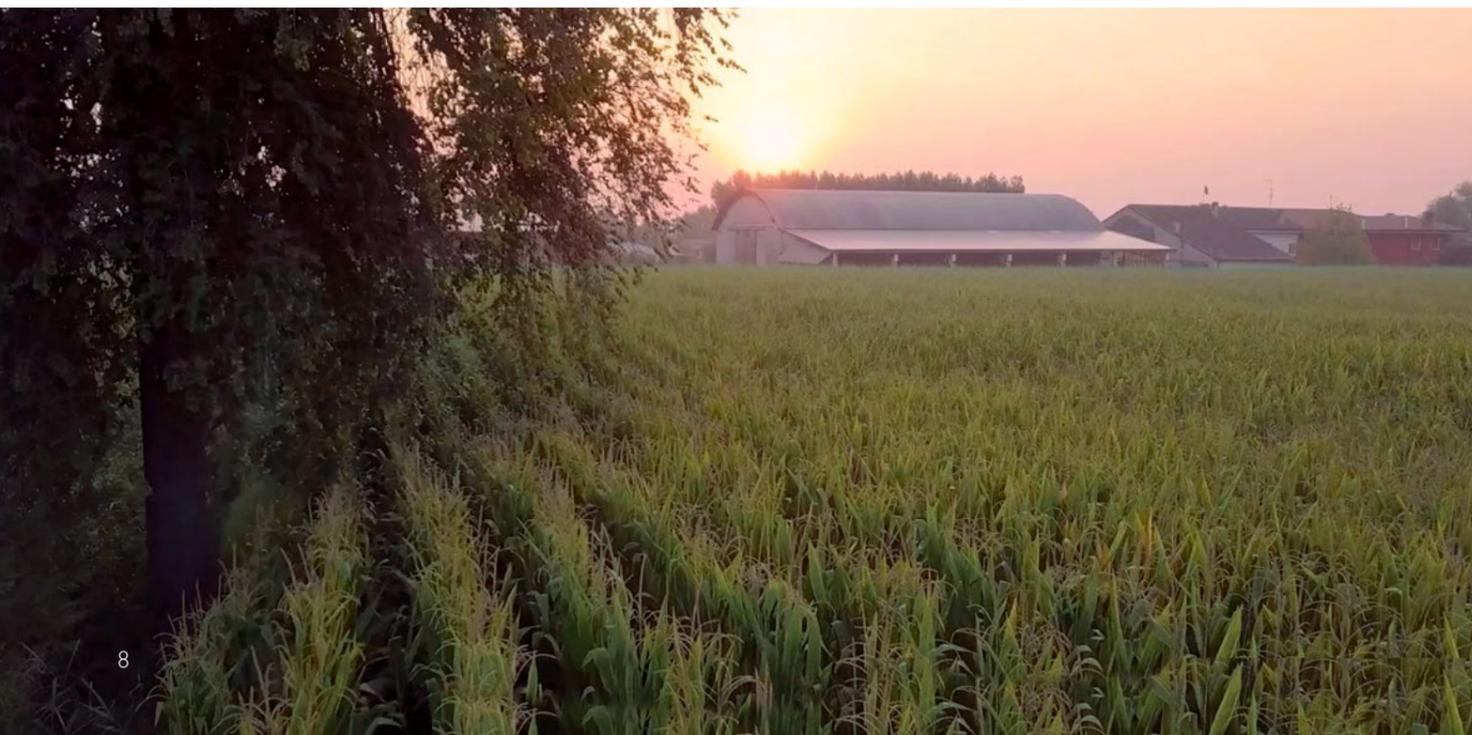
# INALCA Group Values and Business Model

The INALCA Group's founding principle is rooted in Italy's age-old agricultural tradition, which inspires and supports its development model based on an increasingly integrated and sustainable beef supply chain. The company recognises the heritage of values linked to rural lifestyle and the social and cultural importance that land and food have always represented for our country. This business model starts from a consolidated path of development initiated in Italy, based on the construction of an integrated supply chain in the meat sector, following a "downstream" approach—commonly summarised by the expression **"From Farm to Fork"**. This approach involves direct and coordinated control of all stages of production processes, from animal breeding, including slaughtering and meat processing, to the distribution of the final product. Throughout the value chain the company stands out for its strong integration with local communities and all system operators, ensuring attention to social contexts, environmental protection and the needs of the agricultural world.

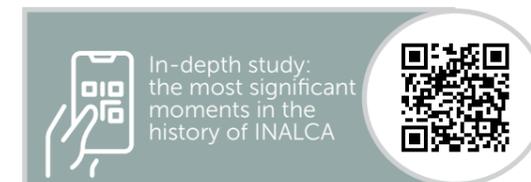
INALCA's ability to combine efficiency and economic performance ensures growth and employment along the entire supply chain, whilst also contributing to the global challenge of producing accessible and safe food for everyone. Internationally, the Group's development is based on an "Upstream" (**"From Fork to Farm"**) model, which begins with exports to emerging markets through the supply of food products to local operators, primarily serving public entities, the Ho.Re.Ca. (Hospitality) sector, and supermarkets.

Subsequently, the company develops distribution logistics platforms and infrastructure to manage the cold chain and various food warehouses. After consolidating its local presence, INALCA invests in the construction of industrial plants for the local production of processed meat products, completing the supply chain with the livestock farming phase.

This development model, based on a long-term vision and strong local integration, has proven effective even during times of health crises, which were overcome thanks to the elevated flexibility of the Group's plants. The ability to rapidly adapt production to the supply chain's changing needs has ensured operational continuity during every emergency phase, consolidating INALCA's competitive position and identity.

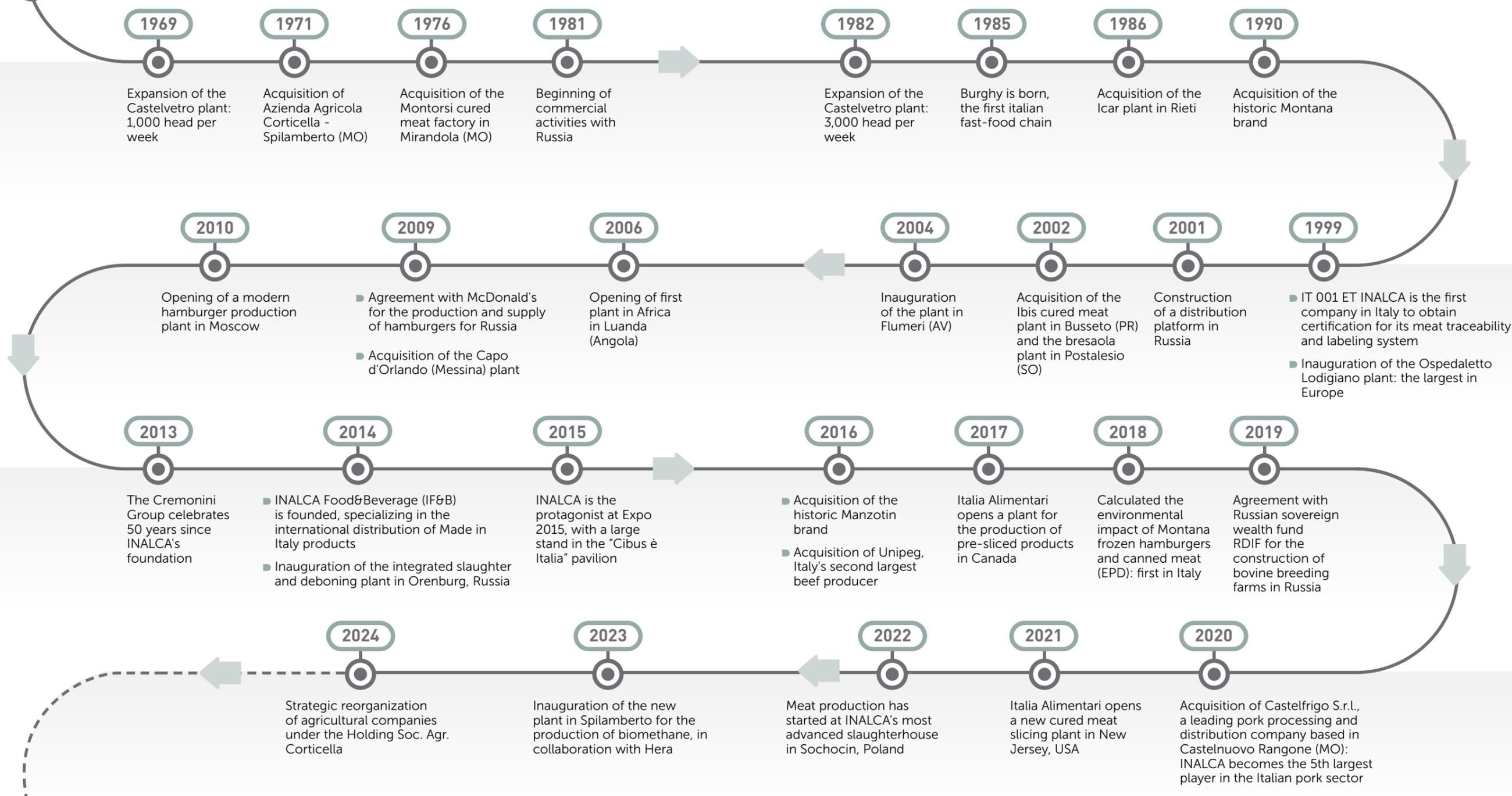


# Our history since 1963, a continuous growth



## 1963 YEAR OF FOUNDATION

di **IN.AL.CA** (Industria Alimentare Carni - Food Meat Industry), Castelvetro di Modena (MO)

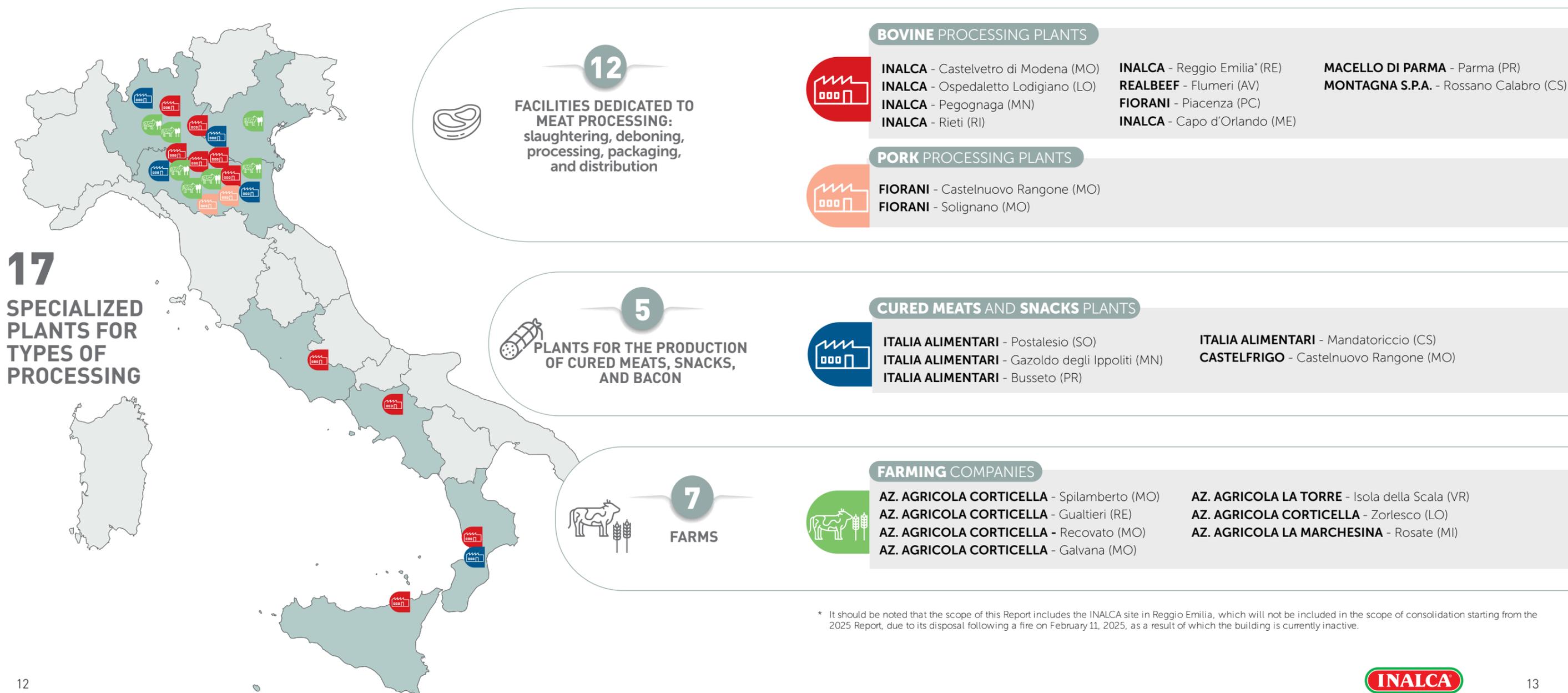


# The Group in Italy

INALCA, with over 7,600 employees, is the leader in Italy and one of the largest European players in the beef sector, and is among the top Italian operators in the pork, bacon, cured meats, and snacks sectors. Furthermore, the company operates as a leading international food distribution company with its own distribution platforms in several emerging countries.

In Italy, the company's industrial structure is divided into 17 specialised plants, 12 of which are dedicated to meat processing—slaughtering, deboning, processing, packaging, and distribution—and 5 dedicated to the production of cured meats, snacks, and bacon. To further strengthen its industrial presence in Italy, Montagna S.p.A. was consolidated during the year, contributing to the expansion of production capacity and the vertical integration of the supply chain.

With reference to agricultural farms, the Group has further consolidated its presence across the territory through directly controlled livestock farms, both via Società Agricola Corticella S.r.l., with sites located in the provinces of Modena and Reggio Emilia, and through Società Agricola Cremovit S.r.l., which owns the livestock at its Castelfranco Emilia (MO) headquarters. Furthermore, although it is not subject to financial consolidation within the Group's perimeter, Società Agricola La Marchesina plays a role of significant importance with regard to the company's ESG performance. INALCA exercises full operational control over the company, exerting a direct influence on its business activities and management decisions, thereby confirming the strategic importance attributed to this entity within the broader context of the Group's agri-food operations.



\* It should be noted that the scope of this Report includes the INALCA site in Reggio Emilia, which will not be included in the scope of consolidation starting from the 2025 Report, due to its disposal following a fire on February 11, 2025, as a result of which the building is currently inactive.

# The Group Worldwide

INALCA is present abroad with 9 production facilities in 6 countries: Russia (2), Africa (2), Poland, Canada, the Canary Islands (2), and Hong Kong. Through its own network of 52 distribution platforms, INALCA directly manages 23 distribution centres located in Russia (Moscow, St. Petersburg, Yekaterinburg, Novosibirsk, Rostov, Samara, and Sochi), Kazakhstan (Astana, Almaty), and Africa (Algeria, Angola, Congo, the Democratic Republic of Congo, Mozambique, and Ivory Coast). The Group's other 29 platforms are managed by its subsidiary INALCA Food & Beverage (IF&B), which specialises in the sale and distribution of Made in Italy food products worldwide. In 2024, INALCA took a further step in strengthening its presence in Europe by consolidating eight agricultural companies in Poland through the company Agrolnwest. This strategic move aims to further develop the local livestock supply chain and improve production efficiency whilst ensuring greater control over the quality of raw materials in line with the integrated approach that has always characterised the Group's business.

The Group's commercial presence reflects the company's profound connection with the local area where it operates. In Italy, INALCA has available livestock brokerage firms both nationally and European-wide, capable of covering key markets and ensuring ongoing dialogue with farmers and local partners. A supply chain that begins in the field and has grown day by day thanks to the Group's expertise and the trust-based relationships built over time.



# Sustainability path



## ESRS TO INALCA AND SDGs

ESRS		SDGs
E1 - CLIMATE CHANGE		SDG 7 - AFFORDABLE AND CLEAN ENERGY SDG 13 - CLIMATE ACTION
E2 - POLLUTION		SDG 12 - RESPONSIBLE CONSUMPTION AND PRODUCTION SDG 13 - CLIMATE ACTION
E3 - WATER AND MARINE RESOURCES		SDG 6 - CLEAN WATER AND SANITATION
E4 - BIODIVERSITY AND ECOSYSTEMS		SDG 15 - LIFE ON LAND
E5 - RESOURCE USE AND CIRCULAR ECONOMY		SDG 2 - ENDING HUNGER SDG 12 - RESPONSIBLE CONSUMPTION AND PRODUCTION
S1 - OWN WORKFORCE		SDG 8 - DECENT WORK AND ECONOMIC GROWTH
S2 - WORKERS IN THE VALUE CHAIN		SDG 8 - DECENT WORK AND ECONOMIC GROWTH SDG 12 - RESPONSIBLE CONSUMPTION AND PRODUCTION
S3 - AFFECTED COMMUNITIES		SDG 2 - ZERO HUNGER SDG 12 - RESPONSIBLE CONSUMPTION AND PRODUCTION
S4 - CONSUMERS AND END-USERS		SDG 3 - GOOD HEALTH AND WELL-BEING
G1 - BUSINESS CONDUCT		SDG 12 - RESPONSIBLE CONSUMPTION AND PRODUCTION

ESRS - European Sustainability Reporting Standards  
SDGs - Sustainable Development Goals (Agenda 2030 ONU)



**GENERAL**  
INFORMATION

# General Information

ESRS 2  
BP-1

## GENERAL BASIS FOR PREPARATION OF THE SUSTAINABILITY STATEMENT

This Sustainability Report, the eleventh of the INALCA Group, covers the period from January 1st to December 31st, 2024, and was prepared on a voluntary basis, drawing inspiration from the new ESRS (European Sustainability Reporting Standards) in preparation for the CSRD (Corporate Sustainability Reporting Directive).

The Report is published annually. The selection of aspects and indicators used to define the reporting content was made taking into account all stakeholders in the value chain relevant to the Group to the extent necessary to report material impacts, risks, and opportunities (RIOs), in accordance with the European Sustainability Reporting Standards (ESRS), through a **Double Materiality analysis**, as required by the CSRD (Corporate Sustainability Reporting Directive). The latter involves identifying the impacts, risks, and opportunities that INALCA's activities have or could have on people and/or the environment (inside-out), and IROs that significantly influence or may influence cash flows, financial position, and future performance (outside-in).

In preparing the Sustainability Report, INALCA adopted the following geographical classification of the territories in which the Group has production facilities, logistics infrastructure, and sales offices: Italy, Europe, Africa, Asia, Australia, and the Americas.

The geographical aggregation identifies the macro-regions in which INALCA's historical progression has been most advanced according to its business model. The reporting scope of the economic and financial data and information corresponds to that of the INALCA Group's Consolidated Financial Statements as of December 31st, 2024. Starting this year, the companies SOCIETA' AGRICOLA LA MARCHESINA S.r.l. and BEST ITALIAN MEAT S.r.l., which are not financially consolidated, but whose operational control is nevertheless of significant importance for the INALCA Group's ESG performance (as previously done for UNITEA S.r.l.), have also been included in the reporting scope. The scope of data and information relating to human resources includes the companies consolidated using the full consolidation method within the Consolidated Financial Statements, as well as the two companies with operational control mentioned above, while the scope of data and information relating to health and safety includes all the companies included in the aforementioned scope with the exception of 4 companies. The environmental data and information include 35 companies, including: 10 production companies, 4 livestock farms, 21 distribution platforms, and 1 fat-to-energy processing plant. The scope of environmental data and information does not include 15 Group companies, consisting mostly of distribution platforms, offices, and holding companies, as they are deemed insignificant with respect to environmental impacts. During the 2024 financial year, with reference to significant changes that occurred during the reporting period under consideration, the following changes occurred during the year in question.

### Companies that left the scope of consolidation:

- ▶ ITALIA ALIMENTARI DEUTSCHLAND;
- ▶ ZHONGSHAN INALCA F&B CO.LTD;
- ▶ INALCA F&B SHANGAI CO LTD;
- ▶ ROYI FINE WINE (SHANGAI) LTD;
- ▶ INALCA FOOD & BEVERAGE CHINA HOLDING;
- ▶ IF&B BEIJING CO.LTD;
- ▶ IF&B BEIJING HOLDING LTD;

With the exception of the first, the exits concerned all companies whose operations ceased during the year following restructuring and relocation of their activities to a new company in Hong Kong with another local shareholder and a related company operating in China.

Also excluded from the scope of consolidation are TREERRE FOOD S.r.l. and PARMA CAPEL, legal entities whose activities were transferred to other companies included in the scope of consolidation following a merger or sale of a business unit.

### New subsidiaries controlled or fully consolidated:

- ▶ AGRO-INWEST AG sp z.o.o.
- ▶ MONTAGNA S.P.A.
- ▶ THE HOUSE OF FINE FOODS MACAU
- ▶ THE HOUSE OF FINE FOODS HK

It is also noted that HOST INNS PTY LTD is close to liquidation, but is still included in this sustainability report.

It is specified that the INALCA site in Reggio Emilia is included in this report, but will not be included in the consolidation scope starting from the 2025 reporting period due to its decommissioning following a fire on February 11<sup>th</sup>, 2025, which means the building is currently inactive.



Finally, the following changes in shareholdings in companies already included in the consolidation scope are noted:

<p><b>SOC. AGRICOLA LA TORRE S.R.L.</b></p> <p>whose participation increased from 56.88% to 63.4%</p>	<p><b>TECALI S.L.</b></p> <p>whose participation has become fully consolidated from the previous 68.32%</p>	<p><b>PARMA FRANCE SAS</b></p> <p>whose participation has become fully consolidated from the previous 24%</p>
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Regarding its value chain, it should be noted that there have been no significant changes to its structure and composition. With regard to any omissions pursuant to ESRS 2 5.2 (d), the Group has not omitted specific information relating to intellectual property, know-how, or innovation results.

In this reporting period, the Group has decided not to include the disclosure of ESRS S1-16 "Remuneration Metrics (Pay Gap and Total Remuneration)" in this report, as the information required is currently considered sensitive. Furthermore, with regard to greenhouse gas emissions (Scope 3 – Category 1: Purchased Goods and Services), it should be noted that, consistent with previous reporting periods, the share of beef purchased from third parties has been temporarily excluded from the emissions calculation. This assumption, adopted as a precautionary measure, stems from the fact that meat from external suppliers is one of the main raw materials related to INALCA's production system. These significant and steadily growing volumes reflect both increased production capacity and the Group's expansion, resulting from the acquisition of new companies and the full operation of strategic plants. Accurate reporting of this data, aimed at appropriately allocating emissions and related emission factors based on geographic origin and bovine type, is therefore essential to avoid potential overestimations in the overall calculation of indirect emissions.

As part of a continuous process of methodological improvement and refinement, INALCA is constantly working to improve the methods for collecting, processing, and calculating data relating to meat purchased from external suppliers. Therefore, starting with the 2024 reporting year, it was deemed essential to break down purchased meat by animal species, with the aim of obtaining a more accurate and representative estimate of the emissions associated with the different types of meat purchased by Group companies. This ongoing effort aims to improve the quality and granularity of data potentially used in calculating indirect emissions. In previous reporting years, purchased meat data was aggregated according to a historically adopted classification (bone-in meats, boneless, frozen), without further distinction by type. The new approach, introduced with the 2024 data collection, provides a higher level of detail, useful for a better understanding of the raw materials involved in the Group's incoming resource flows.

Following this methodological refinement, the 2023 purchased meat data was recalculated, applying the same methodology used for 2024, to ensure greater consistency and interannual comparability of the reported information. During this review, it emerged that the original 2023 figure was partially overestimated due to double counting of meat purchased by INALCA and subsequently used by other Group companies. The analysis conducted in 2024, allowed us to identify and correct these critical issues, ensuring a more accurate and consistent representation of intercompany supply flows.

Following this review, it is noted that, in the 2023 financial year, the total volume of meat purchased from external suppliers by the Group amounted to 170,404 tons, of which 69,208 tons were beef, 87,289 tons were pork, and 13,906 tons were poultry. These data are consistent and ensure proper comparability with the information for the 2024 financial year. In this regard, they are also reported in the ESRS E5-4 "Incoming Resource Flows" section, which represents the Group's main raw material procurements.



**DISCLOSURE IN RELATION TO SPECIFIC CIRCUMSTANCES**

To ensure data reliability, the use of estimates has been limited as much as possible. Where estimates are used, they are appropriately disclosed and based on the best available methodologies.

The estimation methodologies used for quantitative data on the value chain are described in the ESRS E1-6 reference section.

ESRS 2  
BP-2

# Governance

ESRS 2  
GOV-1

## THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

INALCA S.p.A., headquartered in Castelvetro di Modena, is wholly owned by Cremonini S.p.A.

The Corporate Governance Model adopted by INALCA provides for a Board of Directors, a Board of Statutory Auditors, a Supervisory Body, and a Compliance and Internal Audit Office.

The Board of Directors in office as of December 31<sup>st</sup>, 2024, was appointed at the Shareholders' Meeting held on April 28, 2023, and will remain in office until the approval of the financial statements for the year ending December 31<sup>st</sup>, 2024.

The **Board of Directors**, chaired by Luigi Cremonini, has the power to define strategic guidelines and manage ordinary and extraordinary operations. It is composed of seven male directors (100% of the total), of whom 71.43% are executive members and the remaining 28.57% are non-executive members. The Board of Directors guides the company in its decisions, ensuring sound, sustainable management in line with corporate policy. Its main functions include defining corporate strategy, overseeing commercial and production policies, and approving investments in research, development, and innovation—essential elements in a constantly evolving sector. The Board of Directors is also responsible for ensuring full compliance of all company activities with current regulations regarding food safety, product quality, and environmental protection. Through constant monitoring of financial results and the identification of any critical operational issues, it contributes to maintaining high efficiency throughout the entire supply chain. Finally, it plays a crucial role in appointing top management and promoting transparent and responsible governance, ensuring open dialogue with all stakeholders, from employees and customers to investors and communities.

The Vice Chairman of the Board of Directors, as an executive member, exercises the powers to direct and regulate, with full responsibility, the activities of the commercial department. In the event of the Chairman's absence or incapacity, the Vice Chairman assumes his or her duties, ensuring operational and institutional continuity. Furthermore, the Vice Chairman may be involved in representation tasks and in the coordination of specific areas or projects, depending on the company's needs. His or her role contributes to strengthening the balance and effectiveness of the administrative body.

It should be noted that none of the members of the Board of Directors are independent.

With regard to the criteria used for the nomination and selection of members of the highest governance body, since there is no specific procedure, expertise in the business and sector in which the INALCA Group operates is taken into consideration. Indeed, it is believed that the members of the Board of Directors (as well as the Board of Statutory Auditors), also by virtue of ongoing engagement activities, possess adequate experience in the sectors, products, and geographical areas relevant to the company's operations.

The **Board of Statutory Auditors** is responsible for overseeing compliance with the law and the Bylaws, adherence to the principles of sound management, and, in particular, the adequacy of the internal control system, the organisational, administrative, and accounting structure adopted by the Company, as well as its proper functioning. It is a key body within the Group's governance structure, with specific control and supervisory duties.

The Board of Statutory Auditors is composed of 5 members, 3 of whom are standing auditors (including a Chairman) and 2 alternate auditors. The Board of Statutory Auditors comprises 4 male auditors (80% of the total) and 1 female (20% of the total). The Board of Statutory Auditors is responsible for verifying compliance with regulatory and bylaw provisions, ensuring that company management is based on the principles of sound management. Specifically, the Board of Statutory Auditors constantly supervises the adequacy and effectiveness of the internal control system, assessing whether the tools adopted are suitable for preventing management risks and ensuring the regularity of operations. Furthermore, it oversees the company's organisational, administrative, and accounting structure, ensuring it is consistent with the size and complexity of the company and functional to the pursuit of strategic objectives. Its responsibilities also include overseeing the proper functioning of the corporate system as a whole, helping to promote transparency, legality, and integrity in the actions of the administrative bodies.

To date, no members of the Board of Directors are members of other competitor boards of directors. The power of oversight is currently vested in Cremonini S.p.A., of which INALCA is a sub-holding company, together with its subsidiaries Chef Express and MARR.

The **Supervisory Body** (SB) is responsible for overseeing the functioning and effective implementation of the Organisation, Management and Control Model (hereinafter "Model 231") adopted by the company, pursuant to Legislative Decree 231/2021. This Model introduces into Italian law the administrative liability of entities for certain crimes committed in their interest or to their advantage. It plays a fundamental role within the control system established by Legislative Decree N°231 of 8<sup>th</sup> June 2001. Specifically, the SB is responsible for overseeing compliance with, effective implementation of, and updating the Organisation, Management and Control Model (hereinafter "Model 231") adopted by the company, in order to prevent the commission of the crimes set forth in the Decree.

INALCA's Supervisory Body is structured as a collegial body, composed of several members with multidisciplinary expertise. This configuration allows for constant and in-depth monitoring of company activities, as well as a careful assessment of the risks of non-compliance with Model 231. Among its main functions, the Supervisory Board carries out control activities, periodically verifies the effectiveness of the Model, and proposes any updates or amendments based on regulatory developments. Furthermore, it manages information flows to and from the various company functions, fostering a culture of legality and responsibility within the organisation.

The **Independent Auditors** are the external body, appointed by the Shareholders' Meeting, entrusted with the statutory audit of the accounts. INALCA has appointed PriceWaterhouseCoopers S.p.A. to audit the financial statements and consolidated financial statements.

The **Compliance Office** aims to add value to INALCA and its subsidiaries by strengthening corporate governance through an independent and objective assessment of the effectiveness and efficiency of the internal control systems adopted by the companies, identifying potential areas for improvement and formulating specific recommendations aimed at optimising business processes. Specifically, the Compliance Office is committed to promoting a risk-aware and prevention-oriented culture, with the aim of mitigating operational, reputational, and compliance risks that could compromise the proper functioning of the organisation. Furthermore, in relation to the prevention and management of potential conflicts of interest that may affect the highest governance body, the Office prepares and distributes a self-declaration form, which reports any situations that could generate conflicts, thus ensuring transparency, integrity, and accountability in corporate management.

Although employees and other workers are not directly represented on INALCA's administrative, management, and control bodies, the Group places great importance on ongoing and constructive consultation with employee and other worker representatives, such as works councils and trade unions. Regular meetings are held with the various works councils active within the Group, and many INALCA operating companies maintain regular contact with trade unions. All operating companies are required to respect the right to freedom of association of employees and other workers.

In accordance with **Sustainability Governance**, the administrative, management, and control bodies delegate responsibility for managing the organisation's impacts, risks, and opportunities, as identified through the Dual Relevance analysis, to the Sustainable Development Department.

### COMPOSITION OF THE BOARD OF DIRECTORS

POSITION	MEMBER	EXECUTIVE	NON-EXECUTIVE	OTHER RELEVANT OFFICES
CHAIRMAN OF THE BOARD OF DIRECTORS	Luigi Cremonini	<input checked="" type="checkbox"/>		
CHIEF EXECUTIVE OFFICER	Paolo Boni	<input checked="" type="checkbox"/>		
VICE CHAIRMAN OF THE BOARD OF DIRECTORS	Serafino Cremonini	<input checked="" type="checkbox"/>		President of Assocarni
DIRECTOR	Luigi Pio Scordamaglia		<input checked="" type="checkbox"/>	Managing Director Filiera Italia
CHIEF DIRECTOR	Riccardo Zani	<input checked="" type="checkbox"/>		
DIRECTOR	Luigi Cremonini Jr.	<input checked="" type="checkbox"/>		
DIRECTOR	Giosuè De Nigris		<input checked="" type="checkbox"/>	

### COMPOSITION OF THE BOARD OF STATUTORY AUDITORS

POSITION	MEMBER
CHAIRMAN OF THE BOARD OF STATUTORY AUDITORS	Alberto Baraldi
STANDING AUDITOR	Mario Lugli
STANDING AUDITOR	Eugenio Orienti
ALTERNATE AUDITOR	Luca Rossini
ALTERNATE AUDITOR	Francesca Orienti

### COMPOSITION OF THE SUPERVISORY BODY

POSITION	MEMBER
CHAIRMAN	Marcello Elia
EXTERNAL MEMBER	Raffaello Ascensionato Carnà
INTERNAL MEMBER	Giovanni Mario Lugaresi Sorlini

### INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

ESRS 2  
GOV-2

The Board of Directors is informed, through the Sustainable Development Department, through the Management Review - Quality, Environmental Review, Health and Safety Review, and the Sustainability Report, regarding the progress and reporting of the Group's key sustainability issues. Furthermore, the Board of Directors is an integral and constituent part of the process of updating the Organisation's material topics and related IROs, actively participating in their updating activities.

The Sustainable Development Department, supported by the **Sustainability Team**, is responsible for the continuous monitoring and management of ESG issues within the company. The INALCA Group's Sustainability Team is comprised of various corporate functions, with the goal of empowering all key figures in disseminating a culture of sustainability across the board, engaging all areas in the sustainable development process, coordinated by the Sustainable Development Department and the CEO. The areas involved include:

- ▶ Sustainable Development Division
- ▶ Quality Assurance and Control
- ▶ Administration, Finance, and Control
- ▶ Human Resources
- ▶ Risk Management
- ▶ Strategic Planning, Investor Relations, and Information Systems
- ▶ Corporate, Legal, and Insurance Affairs
- ▶ Procurement (including ancillary goods and services)
- ▶ Logistics
- ▶ Technical Services (IT)
- ▶ Operations
- ▶ Energy Management

Collaboration between the Team and the CEO is structured to ensure that activities are aligned with the company's strategy and integrated with other internal functions. In the coming years, the INALCA Group is committed to further strengthening the control process for monitoring its ESG performance. Team members regularly participate in relevant events and initiatives, whilst the Board of Directors receives periodic updates on key regulatory and industry developments.

The Sustainable Development Division is responsible for updating the Dual Relevance analysis at least every two years. All key figures within the Sustainability Team are involved in the assessment of the Group's relevant IROs. For the 2024 financial year, the process involved the Board of Directors, as well as key figures within Cremonini Holding, such as the CFO and the Communications and External Relations Department (for further information, see paragraph IRO-1 on page 51).

The administrative, management, and control bodies, as well as their respective committees, receive structured annual reporting regarding the impacts, risks, and opportunities relevant to the organisation, the implementation of due diligence, as well as the results and effectiveness of the policies, actions, metrics, and objectives adopted to address them. This reporting is based on periodic reviews of the management systems implemented at the company level, which form the basis for the preparation of dedicated sections of the sustainability report.

In overseeing and controlling the company's strategy, the governance bodies take into account the relevant impacts, risks, and opportunities to ensure that strategic decisions are consistent with sustainability objectives and responsible corporate management. As evidence of the commitment to transparency and accountability, a list of the impacts, risks, and opportunities addressed by the administrative, management, and control bodies, or their respective committees, during the reporting period is published annually in the Corporate Sustainability Report and within the dedicated Risk Management Procedure.

ESRS 2  
GOV-3

### INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

The Group recognises the importance of promoting behaviour consistent with its sustainability commitments, including through incentive mechanisms. Currently, however, the incentive system in use is not based on a quantitative calculation that takes into account specific assigned objectives and their relative weight within the overall evaluation. Consequently, there is no structured and documented formalisation of the objectives themselves that can be used as tangible and objective evidence to support the evaluation process. The method currently adopted is predominantly subjective and based on discretionary assessment by management, which considers the work performed by the employee over the previous year as a whole, without subdividing or assigning different weights to the various activities or projects in which the employee participated. In this evaluation approach, two key aspects are particularly relevant: first, the commitment and dedication demonstrated by employees in performing their duties, and second, their collaborative attitude toward colleagues from other functions or departments.

This approach, while enhancing personal and interpersonal qualities, is less effective in defining clear and measurable performance criteria and can lead to assessments that, while fair, may appear less transparent or difficult to replicate.

Furthermore, currently, environmental, climate, or social criteria are not integrated into the remuneration systems for members of the administrative, management, and control bodies. This represents an area for significant improvement, especially given the Group's medium to long-term commitment to ESG.

For this reason, the future intention is to evolve towards a more structured and objective incentive system, based on the use of specific Key Performance Indicators (KPIs) and the assignment of precise weights to the objectives defined for each role. This change requires preliminary internal reorganisation, particularly with regard to the clear and detailed definition of company organisational charts and the tasks assigned to each employee—a process that is already underway, having begun in early 2024. Only through an accurate and shared mapping of tasks and responsibilities will it be possible to identify consistent and measurable objectives, appropriately calibrated to the nature of individual tasks. This system will ensure greater transparency, fairness, and motivation, as well as providing an objective and verifiable framework for staff evaluation and rewards.

With specific reference to the risk examined and the subject of this Due Diligence, it will be progressively integrated into the broader context of Corporate Sustainability Reporting (CSRD). To this end, the aforementioned document has adopted the reporting principles contained in paragraph 4 of Delegated Regulation (EU) 2023/2772 as its reference.

In this regard, the Group has already initiated a series of actions aimed at mitigating negative impacts, also with the aim of developing a robust and sustainable due diligence process in the future, capable not only of ensuring compliance with the Corporate Sustainability Due Diligence Directive but also of generating added value for the company and its stakeholders. Links to the initiatives already underway can be found in the table below.

ESRS 2  
GOV-4

### STATEMENT ON DUE DILIGENCE

The INALCA Group recognises the importance of exercising due diligence, especially within the context of its business model, which is based on an integrated supply chain. In this regard, the principles of Corporate Social Responsibility are contained in the company's corporate policies and Codes of Conduct; they form an integral part of a broader management system for responsible business conduct, articulated in the Corporate Organisational Model pursuant to Legislative Decree 2001/231, the ESRS reference standard for preparing the Sustainability Report, in addition to management systems certified according to ISO 14001:2015, ISO 45001:2023, ISO 9001:2015, and IFS version 8. The Corporate Management System also includes the identification, prevention, and mitigation of INALCA's environmental impacts.

With the aim of further analysing its impacts, both positive and negative, as well as deepening its power of influence along the supply chain, INALCA has consolidated its commitment by preparing an Environmental Due Diligence, concluded in the last quarter of 2024. (<https://www.inalca.it/wp-content/uploads/2025/07/Due-Diligence-ITA-pagine-doppie.pdf>).

It provides an analysis of methane emissions generated by livestock farming, including information on the methodologies adopted and investments made and planned, as well as INALCA's power of influence.

CORE ELEMENTS OF DUE DILIGENCE		REFERENCES
a)	Integrate due diligence into governance, strategy, and business model	ESRS 2 - GOV-2 (pg. 27); ESRS 2 - SBM-3 (pg. 44)
b)	Engage stakeholders in all key stages of due diligence	ESRS 2 - SBM-2 (pg. 42); ESRS S1-2 (pg. 111);
c)	Identify and assess adverse impacts	ESRS 2 - IRO-1 (pg. 51)
d)	Take action to address adverse impacts	ESRS E1-3 (pg. 68); ESRS E2-2 (pg. 86); ESRS E3-2 (pg. 88); ESRS E4-3 (pg. 93); ESRS E5-2 (pg. 96); ESRS S1-3 (pg. 111); ESRS S2-3 (pg. 124); ESRS S4-3 (pg. 136)
e)	Monitor and report the effectiveness of interventions	ESRS 2 MDR-T (pg. 164)

**RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING**

As part of the effective identification, measurement, management, and monitoring of key corporate risks, the organisation has implemented a structured system for collecting and reporting non-financial data, based on the integration of corporate management systems and compliant with international sustainability standards. Environmental and social data, collected extensively at individual plants, are subject to periodic review as part of management reviews and subsequently consolidated within the ESGeo platform, specifically dedicated to ESG data management. The process is overseen by qualified personnel responsible for data validation, which is reported annually in the Sustainability Report. The company conducts a Materiality Analysis (Dual Relevance from this year) at least every two years to identify and assess significant impacts, risks, and opportunities along its value chain. This process is based on a structured methodology that integrates stakeholder consultation, internal and external context analysis, and assessment of the significance of impacts. The identified risks are then prioritised using quantitative and qualitative criteria, taking into account the likelihood of occurrence and the severity of the consequences, in order to guide corporate strategies and sustainability reporting in a consistent and transparent manner. The company also commits to annually reassessing its risk analysis within the context of its other existing management systems, through reviewing procedures and updating corresponding reviews. The results of both risk assessments and internal controls are incorporated into the sustainability reporting process, thanks to systematic coordination between the various corporate functions involved, thus ensuring consistency, reliability, and compliance with regulatory and international standards. Furthermore, the company ensures periodic and structured reporting on sustainability issues to the administrative, management, and control bodies through detailed reports and dedicated discussions, promoting a timely, transparent, and useful flow of information to support decision-making and supervisory processes.



# Strategy

ESRS 2  
SBM-1

## STRATEGY, BUSINESS MODEL, AND VALUE CHAIN

Today, the INALCA Group, with over 7,600 employees, is one of the largest European players in the beef sector and is also among the leading Italian operators in the pork, bacon, cured meats, and snacks sectors. The company also operates as a leading international food distribution company with its own distribution platforms in several emerging countries.

### BRANDS



180,000

HEADS/YEAR  
RAISED DIRECTLY  
AND ON CONTRACT



112 million

TRAYS OF  
PRE-SLICED  
MEAT



200 million

TINS OF MEAT



35 million

SNACKS AND  
SANDWICHES



85,000

TONNES OF  
HAMBURGERS



90,000

TONNES  
OF PORK



9,000

TONNES OF FRESH  
PRE-COOKED BACON



40,000

TONNES OF CURED  
MEATS PROCESSED

### Group brands and products

INALCA is well aware of the responsibilities that this role entails towards the customers and consumers who choose its products every day. This commitment is unwavering, ensuring maximum safety, quality, and wholesomeness, thanks also to the systematic adoption of voluntary food safety certifications at its production facilities, in line with the highest international industry standards. Not only safety, but also a strong focus on the consumer, which involves understanding, addressing, and anticipating the socio-economic-cultural changes in the world in which INALCA operates. This commitment responds to new consumer needs that demand simple and natural ingredients, a balanced nutritional intake, as well as transparent labelling, sustainability, and fair pricing. Obtaining products with select ingredients from controlled supply chains, nutritionally balanced, and a short list of ingredients on the label. These foods meet the diverse needs of consumers, providing clear information for proper shelf choices and thus encouraging informed decisions for a balanced diet, one that is both varied and balanced, in line with the principles of the Mediterranean Diet, and sustainable for both health and the environment. This, in short, is INALCA's commitment. This commitment is made possible through INALCA's integrated supply chain model, which allows the company to monitor and, where possible, improve its performance at all levels of the supply chain by applying the best available techniques in livestock and food production.

The company's commitment is therefore to reformulate existing product recipes or develop new ones in line with needs related to, for example, eliminating or reducing additives, such as preservatives and flavour enhancers (reduced salt content), favouring those of natural origin and eliminating allergen-containing ingredients (gluten-free). Recipes focus on a balanced or reduced fat content (low-fat), favouring raw materials from controlled Italian supply chains (100% meat from Italian farms and organic production).

Thanks to its subsidiaries Italia Alimentari and Castelfrigo LV, specialising in pork processing, the production sector encompasses the entire spectrum of Italian cured meats, both traditional and innovative, in whole, pre-sliced, and sliced formats. The company has also embraced the broader out-of-home market, now offering a wide range of snacks, sandwiches, tramezzini and ready-to-eat vegetarian dishes. A business unit is dedicated entirely to the production of bacon, both fresh, pre-cooked and frozen using the IQF (Individually Quick Frozen) system, from industrial formats for the B2B market to ready-to-sell trays for the end consumer.



In addition to nutritional claims, which supplement the legally required information, the labelling of products distributed by INALCA contains detailed nutritional tables per portion. All this translates into a transparent communication and marketing policy, enabling consumers to easily understand the nutritional content and ingredients of products so they can make informed consumption choices. Finally, aware of the growing importance of environmental issues, the company is constantly working to monitor and improve its environmental performance using product life cycle analyses (LCA) and environmental product declarations (EPD); a constant commitment to innovation, to make the beef production chain increasingly sustainable.

PRODUCTS FROM ITALIAN SUPPLY CHAINS

**MONTANA**

What sets Montana meat apart is its entirely Italian production chain: from farms to processing plants. The bovine in the supply chain is raised with full respect for animal welfare, following the principles of the 5 freedoms formulated by the FAWC (Farm Animal Welfare Council). The internal document "Good Livestock Practices Manual" is available.



**FIORANI**

Fiorani is a certified organic operator and produces an organic range of anatomical, minced, portioned and processed cuts from organic agriculture and livestock. The process is certified by the CCPB inspection body and complies with EC Regulation 834/2007.

ORGANIC PRODUCTS

PDO AND PGI PRODUCTS

**ibis**  
SALUMI

In the heart of the Po Valley, in Busseto (Parma), lies the Ibis plant, where traditional Italian cured meats boast Protected Designation of Origin (PDO) and Protected Geographical Indication (PGI) certifications.

The PDO range includes Culatello di Zibello and Salamino Italiano alla Cacciatora, while the PGI range includes Mortadella Bologna, Coppa di Parma, Salame Felino, Salame Cremona, and Bresaola della Valtellina, produced at the Postalesio (Sondrio) plant.



**MONTANA** EPD®

The Frozen Natural Hamburgers and the Classic Montana Line of Jellied Meat have obtained the Environmental Product Declaration (EPD): an innovative, independent, and internationally recognised system that allows all product characteristics, performance, and environmental impacts to be assessed and communicated in an objective, comparable, and verifiable manner. The Declaration uses Life Cycle Assessment (LCA) in accordance with the ISO 14040 series standards, allowing for the analysis and quantification of energy and natural resources used in production and distribution processes, CO<sub>2</sub> emissions, the quantity of packaging materials, and waste resulting from the production cycle.



PRODUCTS WITH ENVIRONMENTAL DECLARATION

GLUTEN-FREE PRODUCTS

**ibis**  
SALUMI

Italia Alimentari was the first company in Italy to launch gluten-free tramezzini: their distinctive feature is a soft and tasty bread made with completely gluten-free flours and ingredients, filled in a completely separate section. The products feature the AIC (Italian Celiac Association) crossed-out ear of wheat logo on the packaging. All Ibis deli meats—such as the Gran Ducato Mortadella made with Italian meat—use ingredients that are free of gluten and derivatives.



**FIORANI**

All Fiorani products are gluten-free, particularly the Fiorani and Benessere Fiorani lines, which carry the AIC crossed-out ear of wheat logo, in facilities where the entire processing eliminates any possible contamination of the meat.



**MONTANA**

The Montana line of canned meats, including Beef in Jelly (classic and gold lines), Chicken in Jelly, Bolognese Ragù, and Jambonnet, are gluten-free. All products are registered in the AIC handbook.





The Ibis "Light Slices" cured meats are light and low in salt, including high-quality cooked ham (max 3% fat), raw ham (-60% fat), roast chicken breast (max 2% fat), and roast turkey breast (max 2% fat).

**LOW-SALT PRODUCTS**



The Oro Line Beef in Jelly has a lower salt content than the average Montana canned meat.



**GLUTAMATE-FREE PRODUCTS**

The Classica line of Beef in Jelly is glutamate-free, enriched with the natural flavour of the broth derived from cooking the meat. This preserves its flavour and natural properties.



Ibis Culatta di Busseto is a prestigious cured meat produced in the Busseto plant using traditional methods and aged for at least 14 months. Milk and dairy products are not used in the production of Culatta, as is the case with all our branded cured meat products.

**LACTOSE-FREE AND DAIRY-FREE PRODUCTS**



**Business Model and Value Chain**

INALCA S.p.A.'s supply chain is broad and complex, varying depending on the type of product and geographical area of production. INALCA's suppliers must sign the Code of Ethics and the Code of Business Conduct to establish a supply relationship. These control tools, along with dedicated audits, ensure compliance with human rights, the environment and labour regulations. In line with global standards, INALCA assesses each supplier's risk based on their ability to meet business needs, applying specific criteria for each category, shared with the relevant purchasing department. Since 2019, INALCA has demonstrated its commitment by joining the Sedex (Sedex Information Exchange) system, a UK-based, globally recognised association that provides companies with an online responsible sourcing platform. The aim is to create ethical supply chains along the entire value chain, as well as improve the transparency of the activities of participating companies. INALCA has currently registered five of the main production facilities in Italy (Castelvetro, Ospedaletto, Pegognaga, Rieti, and Rossano Calabro) on the platform.

INALCA has built its business model around a key principle: integrated and sustainable control of the entire agri-food supply chain. This vertical integration allows the company to oversee all stages of production and distribution, from raw materials to the end consumer, ensuring high standards of quality, food safety, traceability and adaptability to the diverse markets in which it operates.

The model took shape in Italy, where it developed according to a "Downstream" approach—or "From Farm to Fork"—starting from the livestock farm and ending with the distribution of the finished product. Abroad, however, development followed the opposite path, "Upstream"—"From Fork to Farm"—with initial market entry through commercial and logistics activities, and a progressive construction of the production chain starting with distribution.

**MAIN SUPPLIERS**

**MAIN UPSTREAM SUPPLIERS: PRODUCTION AND SUPPLY OF RAW MATERIALS**

Upstream activities represent the heart of the production component of INALCA's supply chain. In this phase, the company relies on a broad network of strategic suppliers, starting with **breeders**, who form the basis of its livestock procurement. INALCA directly manages numerous farms in Italy, but also collaborates with a network of partner breeders, selected and integrated into its business processes according to quality, animal welfare, and sustainability criteria.

At the same time, the company also imports **meat** from abroad, particularly from countries with which it has established business relationships, to ensure supply continuity and meet the demand of diverse markets.

Other key suppliers in this phase are those related to **animal nutrition**—producers of feed, fodder, and supplements—and **providers of specialised services** such as veterinarians, analysis laboratories and technologies for traceability and health monitoring of farmed animals.

**Packaging material** suppliers also play an important role from the initial stages of the production process, especially in ensuring hygienic and sanitary conditions during meat storage and handling. INALCA selects partners capable of providing technologically advanced and sustainable solutions, meeting both regulatory requirements and the logistical and environmental needs of the integrated supply chain.

Slaughterhouse, primary processing, and processing take place in company-owned, highly automated facilities that ensure compliance with health and environmental regulations. This is where the value chain begins, leading the product to the final consumer, maintaining close control over the production process at every stage.

Regarding livestock farming, it is important to distinguish between what the INALCA Group controls directly and what is managed by external suppliers. INALCA owns several livestock farms in Italy and Europe (Poland), where it primarily raises bullocks and white-meat veal. However, the majority of its animals come from an extensive and complex network of breeders, both licensed and independent.

The level of control INALCA exercises throughout the beef supply chain reflects the solidity of the structure the company has built over time. Thanks to a consolidated network of directly managed and affiliated farms, INALCA has developed a significant ability to influence practices on fattening and white-meat veal farms. Throughout these stages of the supply chain, the company is able to effectively implement rigorous standards of quality, animal welfare, and environmental sustainability, thanks to structured contracts, shared technical services, and strong operational integration with its livestock partners. The situation is different for post-production dairy cattle, a type of animal that INALCA purchases from intermediaries and markets, without having its own farms or direct contact with the farmers. This significantly limits its ability to exert a concrete influence on the farming practices and sustainability standards adopted in this part of the supply chain.

Aware of this criticality, INALCA has been engaged for years in a dialogue with the main trade associations, as well as institutions and stakeholders in the dairy industry, with the aim of establishing structured collaborations that allow for greater control, traceability, and alignment at this stage of the production chain. The ambition is to extend the best practices already established in other segments to dairy farms, addressing key issues such as animal welfare, environmental impact, and the economic sustainability of the supply chain together with industry partners.

Significant livestock farming activities have been launched in the Russian Federation within an integrated and sustainable local supply chain. Bovine are sourced exclusively from local suppliers, with the Orenbeef plant using 11 agistment farms, which delivered over 5,118 head of cattle during the year.

INALCA is a global food-sector operator, sourcing its meat suppliers from across all continents and from countries recognized for their expertise in meat export. Our meat suppliers come from various geographical locations and provide products with varying quality characteristics depending on the type of animals and farming systems used. Different producer categories can be identified: for meat destined for industrial processing, such as canned meat produced in Italy, INALCA, in addition to its own slaughterhouses, also uses other small local plants, aiming to enhance the national beef supply chain used in a typically Italian product, such as jellied beef. For the production of frozen hamburgers and cuts of meat for the domestic and international markets, INALCA uses, in addition to raw materials supplied by Italian farms, produced and processed directly in its own domestic plants, meat obtained from other national and EU suppliers. Over time, solid and consolidated relationships have been built with these suppliers, allowing for the progressive integration and alignment of voluntary certification systems for food quality and safety, in line with INALCA's evaluation and qualification systems.

For premium cuts of meat destined for the Ho.Re.Ca. (Hospitality) sector, INALCA imports meat from various non-EU countries; these products are obtained from animals with Anglo-Saxon genetics, such as the renowned Angus and Hereford breeds, which are imported fresh. These high-quality cuts are primarily intended for specialty restaurants, a classic example of which is the USA T-Bone steak, produced in the most important American plants concentrated in the state of Nebraska, part of the so-called "Corn Belt" (a region of the United States rich in corn, primarily used for livestock).

Added to these are the renowned Argentine, Australian, and Uruguayan meats, including both Grass-Fed (a farming system that allows bovine to graze on pasture throughout their life cycle) and Grain-Fed (grain-fed) lines. In this case, INALCA operates an exclusive distribution network. Monitoring these suppliers focuses not only on food safety aspects but also on a broader procurement system aimed at defining quality parameters and ethical and social commitments, from feedlot farming, processing methods, and labelling at supplier facilities, to final sales controls. Beyond monitoring, INALCA supports overseas suppliers in aligning



their quality and sustainability standards with the specific regulatory requirements of the countries where the products are destined, such as the recent European Union (EU) regulation on combating deforestation (EUDR).

This strategy of promoting high-end meat also includes two of the Group's distinctive brands: **Mazura** and **Carima**. Mazura is a premium program dedicated to marbled meat from the Mazury region in northeastern Poland. Here, a favourable natural environment, combined with select and sustainable farming practices, allows for the production of excellent meat, obtained from heifers under 36 months of age, selected according to a rigorous protocol based on marbling. The result is superior quality meat, destined to satisfy even the most discerning palates. Carima, on the other hand, represents Italian excellence in marbled

meat. The program selects Friesian bovine sourced exclusively from the Po Valley, characterised by optimal conformation and a high degree of marbling, which directly influences the tenderness, juiciness, and flavour of the meat, making it ideal for high-quality gastronomy. Both brands are aimed primarily at specialised restaurants, helping to strengthen INALCA's position in the premium beef segment.

For the pork sector, in Italy the Group favours domestic suppliers of fresh meat that comply with the PGI and PDO (Protected Geographical Indication - Protected Designation of Origin) requirements necessary for the production of high-quality cured meats primarily for the domestic market. For other pork products destined for European and non-European markets, such as bacon, domestic and EU-sourced meat is used. For the pork sector, INALCA also plans investments in dedicated facilities for greater industrial efficiency and production integration into the supply chain.

### Ancillary Materials

INALCA uses various types of packaging, primarily plastic, paper, and cardboard for fresh and frozen meat, while tins and aluminium are used for canned meat. In Italy, the company relies on approximately 89 suppliers selected according to specific criteria: technical expertise, ability to offer assistance and technological innovation, as well as consolidated experience with large industrial groups. Before starting any supply, suppliers must register on INALCA's dedicated portal and upload all the technical information necessary for validation of both the company and the individual materials intended for each plant. Packaging, being an integral part of the product, is constantly monitored to ensure its suitability, food safety, and integrity, both during receipt and use. The quality of the packaging is essential to ensure product protection, and its correct use must be fully compatible with the packaging technologies adopted by the company.

In addition to meat, INALCA uses a variety of food ingredients—such as flavourings, vegetables, and flours—from over 100 suppliers in Italy. The company favours local and consumer-recognisable ingredients, paying particular attention to selection criteria that include: supplier technical expertise, food safety, absence of allergens, quality certifications and technical characteristics of raw materials. An additional evaluation factor is the supplier's ability to support corporate innovation projects. All suppliers undergo an initial qualification process, and the most strategic ones are also subject to periodic inspections by INALCA's technical team. Furthermore, each delivery is verified through constant product monitoring. Here too, the company uses a digital portal shared between the purchasing and quality departments, where all the information necessary for the assessment is collected.

The procurement policy is strongly localised: approximately **53% of suppliers of auxiliary materials are located in Emilia-Romagna and Lombardy**, regions home to INALCA's main plants. This proximity fosters partnerships, efficiency, and the development of joint technological improvement projects.

## MAIN CUSTOMERS AND DISTRIBUTION CHANNELS

### DOWNLOAD: DISTRIBUTION AND END USERS

INALCA, thanks to its business structure, is able to meet the diverse needs of its customers and end users through various distribution channels.



**Logistically**, INALCA is able to serve a vast network of markets, including international ones, thanks in part to its subsidiary INALCA Food & Beverage, which distributes its products—and other food products—in over 70 countries. Furthermore, the company also relies on external suppliers, including MARR, a company specialising in distribution for the Ho.Re.Ca. sector, also part of the Cremonini Group. This structure ensures efficient, flexible, and widespread service, allowing INALCA to promptly reach its customers worldwide, adapting to the characteristics and dynamics of the various markets served.



**Commercially**, INALCA serves **large-scale retail trade** (GDO), with which it collaborates on a regular basis, offering its own-brand and private-label products. In these channels, the company stands out for the breadth of its offering and its ability to customise, as well as an integrated logistics and support service.



Finally, at the heart of the supply chain are **consumers**, who purchase INALCA products through supermarkets, retail outlets, and quick-service and non-quick-service restaurants.

Its **integrated model** allows the company to maintain a high level of quality and responsiveness to market needs, ensuring continuity even in critical situations, as demonstrated during previous global health emergencies.

Please note that, in accordance with ESRS 2 SBM-1, paragraph 40, letter d), the company is not active in the sectors indicated and therefore does not generate revenue from activities related to fossil fuels (coal, oil, and natural gas), nor from activities related to their production, transformation, distribution, transportation, storage, or trade; manufacture of chemical products, as described in Division 20.2 of Annex I to Regulation (EC) N°1893/2006; production of controversial weapons, including anti-personnel mines, cluster munitions, chemical weapons, and biological weapons; and tobacco cultivation and production.

In the energy sector, the company's primary activity is the production of biogas from agricultural biomass, as well as slaughterhouse by-products, through anaerobic digestion. Biogas is a renewable fuel that, pursuant to Article 2, point 62 of Regulation (EU) 2018/1999, does not fall within the definition of a fossil fuel. Furthermore, it should be noted that, in addition to biogas production, the company is also engaged in the production and distribution of bioliquids, in compliance with the provisions of Legislative Decree N°185 of November 14<sup>th</sup> 2019, regarding sustainable bioliquids.

ESRS 2  
SBM-2

## INTERESTS AND VIEWS OF STAKEHOLDERS

Aware of the complexity of the beef supply chain, media debate, and evolving stakeholder awareness of issues in the meat sector, INALCA conducted a priority analysis to identify the Group's areas of intervention, the issues to be explored in depth, and the stakeholder engagement activities to be strengthened. Organised stakeholder engagement on priority issues is the primary tool through which the company defines and directs its sustainable development trajectories. A substantial contribution has come from INALCA's active participation in debates and working groups within the trade and sector associations of which it is a member at national and international levels. Among these, particular importance has been given to participation in technology platforms specifically addressing the sustainability of the beef sector at regional and global levels, as well as in agricultural producer organisations and institutional forums for the analysis and evaluation of new regulations. Among these, GRSB, ERBS, SAI Platform, Coldiretti, and Confagricoltura, with which INALCA engages and actively participates, are the most authoritative and qualified. These technology platforms bring together industry-leading companies, the scientific community, and stakeholders to identify guiding values and sustainable production techniques in the beef sector, promoting their adoption at all levels of the supply chain.

Dialogue with stakeholders is central to guiding INALCA's sustainability and corporate responsibility strategies. The opinions gathered through ongoing discussions with customers, employees, sales force, and suppliers serve as a guide to ensure that strategic and operational decisions are consistent with stakeholder expectations.

In 2023 (Sustainability Report 2022), key stakeholders were engaged through an online survey to assess the significance of impacts, risks, and opportunities along the value chain. The results contributed to the previous materiality analysis, which served as the basis for the Impact Materiality analysis in the context of the current year's Double Relevance analysis. This analysis was conducted with the sole consultation of top management, as well as key figures from the administrative, management, and control bodies.

The process of identifying stakeholders involved in the INALCA Group's materiality analyses takes into account the following principles:

- ▶ **Influence:** stakeholders who have a direct influence on INALCA's decision-making processes;
- ▶ **Proximity:** stakeholders with whom INALCA interacts most directly;
- ▶ **Collaboration:** Stakeholders who collaborate effectively with INALCA in economic or financial terms;
- ▶ **Representativeness:** stakeholders, who, through the regulation of representation, or by custom, can legitimately represent a specific issue.

Further references in the dialogue and listening process are the codes of conduct and sustainable development policies subscribed to by INALCA within its supply chain.

## STAKEHOLDERS



ESRS 2  
SBM-3

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The INALCA Group adopts a transparent approach to communicating the significant impacts, risks, and opportunities identified through the dual-relevance analysis process. These factors, both positive and negative, are closely linked to the Group’s strategy and operating model. In this perspective, INALCA recognises the potential impact of its activities on people and the environment and is committed to implementing appropriate actions to mitigate any negative effects. The analysis conducted examines not only internal activities but also the entire value chain, including both the upstream (suppliers) and downstream (customers and consumers) phases, with the aim of identifying the most critical areas in terms of impacts and risks. This qualitative assessment allows the Group to continuously update and strengthen its strategy, fostering resilience to environmental and social changes while simultaneously promoting the ability to seize new opportunities. The strength of the supply network, efficient logistics, and a constant commitment to innovation are key levers for ensuring consistency between corporate objectives and sustainability priorities.

Thanks to these tools, the INALCA Group is able to respond promptly to evolving competitive and regulatory environments, ensuring operational continuity and the pursuit of sustainable development.

As this is the first year in which the dual relevance analysis has been formally applied, the comparison is limited to the impacts identified for 2023. No significant changes were found compared to those previously identified. For further information on the relevance assessment process, please refer to section IRO-1. Further information on the current and potential effects of the identified impacts, risks, and opportunities, as well as the measures the Group plans to address them, is available in the sections indicated in the table.

ESRS TOPIC	IMPACT	NATURE	TYPE	TYPE OF CONTRIBUTION	POSITION IN THE VALUE CHAIN	TIME HORIZON
ESRS E1 CLIMATE CHANGE	<b>Generation of direct and indirect energy-related GHG emissions (Scope 1 and 2)</b> Contribution to climate change through direct and indirect energy-related GHG emissions, linked to the activities carried out at the Group’s offices and sites	Negative 	Current	Directly caused by the Group	Own operations	Brief
	<b>Generation of indirect GHG emissions (Scope 3)</b> Contribution to climate change through GHG emissions related to production and transport activities along the value chain	Negative 	Current	Directly connected through a business relationship	Upstream and downstream	Brief
	<b>Energy consumption</b> Consumption of energy from non-renewable sources, with consequent negative impacts on the environment and reduction of energy stocks	Negative 	Current	Directly caused by the Group	Own operations	Brief
ESRS E2 POLLUTION	<b>Polluting emissions into the atmosphere at production plants</b> Negative impact on air quality, due to the emission of pollutants such as particulate matter, nitrogen oxides (NOX) and sulphur oxides (SOX) at the production activities of the INALCA Group.	Negative 	Current	Directly caused by the Group	Own operations	Brief
	<b>Polluting emissions into water and soil in livestock farms</b> Negative impact on water and soil quality due to livestock farming activities at its own sites and along the value chain.	Negative 	Current	Directly caused by the Group and linked through a business relationship	Upstream and own operations	Brief
ESRS E3 WATER AND MARINE RESOURCES	<b>Reduction in water availability and quality</b> Use of water in one’s production processes with repercussions on the availability of water resources in the area and negative impacts in terms of the release of pollutants into groundwater or surface water.	Negative 	Current	Directly caused by the Group	Own operations	Medium
ESRS E4 BIODIVERSITY AND ECOSYSTEMS	<b>Impacts of crops and livestock farming on ecosystems and soil health, resulting in biodiversity loss</b> Impacts on biodiversity and the quality of natural ecosystems, including erosion and/or reduction in soil fertility, due to cultivation and livestock farming practices, including those related to the use of pesticides.	Negative 	Current	Directly caused by the Group and linked through a business relationship	Upstream	Brief
	<b>Impacts of crops and livestock farming on ecosystems and soil health, resulting in soil degradation</b> Impacts on biodiversity and the quality of natural ecosystems, including erosion and/or reduction in soil fertility, due to cultivation and livestock farming practices, including those related to the use of pesticides.	Negative 	Current	Directly caused by the Group and linked through a business relationship	Upstream	Long

ESRS TOPIC	IMPACT	NATURE	TYPE	TYPE OF CONTRIBUTION	POSITION IN THE VALUE CHAIN	TIME HORIZON
ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY	<b>Consumption of raw materials for packaging</b> Indirect environmental impact related to the production and processing of packaging materials along the supply chain (plastic, paper, cardboard, wood, metal, etc.)	Negative	Current	Directly caused by the Group and linked through a business relationship	Upstream and own operations	Brief
	<b>Consumption of food raw materials for production</b> Environmental impact related to the intensive use of food raw materials (live-stock, feed, etc.) and other ingredients required for production.	Negative	Current	Directly caused by the Group	Own operations	Brief
	<b>Recovery and reduction of production waste through circular economy processes</b> Exploit production waste to create new by-products for use in other stages of the supply chain, such as digestate on farms, replacing synthetic and/or chemical fertilisers, or other products in the pharmaceutical, pet food, tanning, biomedical, and bioenergy industries.	Positive	Current	Directly caused by the Group and linked through a business relationship	Upstream, own operations and downstream	Long
	<b>Recycling and reuse of production waste and generated waste</b> Creating positive impacts through the recycling and reuse of waste materials, wastewater, and by-products to reduce the need for raw materials and waste-related impacts, including through energy recovery (e.g., biogas), and to create new by-products for use in other industries, such as pharmaceuticals, biomedical products, leather goods, cosmetics, and animal feed.	Positive	Current	Directly caused by the Group and linked through a business relationship	Upstream, own operations and downstream	Long
	<b>Waste generation</b> Environmental impacts related to the production of hazardous and non-hazardous waste both during the production phase and along the value chain (transport, packaging, post-consumer).	Negative	Current	Directly caused by the Group and linked through a business relationship	Upstream and downstream	Long

ESRS TOPIC	IMPACT	NATURE	TYPE	TYPE OF CONTRIBUTION	POSITION IN THE VALUE CHAIN	TIME HORIZON
ESRS S1 OWN WORKFORCE	<b>Fair remuneration for its employees and independent contractors in its Group offices</b> Guarantee of a level of income or salary sufficient to ensure a decent standard of living for all family members of its employees.	Positive	Current	Directly caused by the Group	Own operations	Brief
	<b>Accidents at the workplace relating to the workforce itself</b> Accidents or other incidents in the workplace, with negative consequences for the health of company workers and non-employees.	Negative	Current	Directly caused by the Group	Own operations	Long
	<b>Training and development of company workers and non-employees</b> Improving the skills of company employees and non-employees through training and professional development activities, including those linked to growth objectives and personalised evaluation.	Positive	Current	Directly caused by the Group	Own operations	Breve
	<b>Discrimination and non-inclusive practices in the workplace</b> Negative impacts on employee satisfaction and motivation due to discrimination (e.g. related to gender, age, ethnicity, etc.) or other non-inclusive practices.	Negative	Potential	Directly caused by the Group	Own operations	Brief
	<b>Risk of personal data privacy breach</b> Improper handling of employee personal data could expose the company to privacy breaches, resulting in significant reputational damage.	Negative	Potential	Directly caused by the Group	Own operations	Brief
ESRS S2 WORKERS IN THE VALUE CHAIN	<b>Fair remuneration of workers in INALCA's value chain by suppliers and customers</b> Raising awareness among its suppliers and customers to guarantee a level of income or salary sufficient to ensure a decent standard of living for all family members of workers in INALCA's value chain.	Positive	Current	Directly connected through a business relationship	Upstream and downstream	Brief
	<b>Workplace accidents involving workers in the INALCA value chain</b> Accidents or other incidents in the workplace, with negative consequences for the health of workers in the value chain.	Negative	Current	Directly connected through a business relationship	Upstream	Long
	<b>Training and development of workers in the value chain</b> Improving the skills of workers in INALCA's value chain by raising awareness among suppliers and customers regarding the implementation of training and professional development activities for their employees.	Positive	Current	Directly connected through a business relationship	Upstream	Brief
	<b>Negative social and environmental impacts related to suppliers</b> Negative impacts related to the procurement of goods and services from suppliers, in particular the impacts generated by them on social and environmental aspects.	Negative	Current	Directly connected through a business relationship	Upstream	Brief

ESRS TOPIC	IMPACT	NATURE	TYPE	TYPE OF CONTRIBUTION	POSITION IN THE VALUE CHAIN	TIME HORIZON
ESRS S3 STAKEHOLDER COMMUNITIES	<b>Local development and community relations, through the generation of indirect economic impacts</b> Generation of indirect economic impacts of a positive nature, linked for example to economic development in poverty-stricken areas, improvement of skills and competences in a professional community or in a geographical area.	Positive	Current	Directly caused by the Group and linked through a business relationship	Upstream, own operations and downstream	Long
	<b>Impact on the rights of local communities resulting from the use of land and natural resources</b> Adverse impact on human rights and tenure rights arising from suppliers' use and management of land and natural resources, with possible repercussions on local communities.	Negative	Potential	Directly connected through a business relationship	Upstream, own operations and downstream	Medium
ESRS S4 CONSUMERS AND END USERS	<b>Food contamination and reduced consumer safety</b> Food contamination and the occurrence of foodborne illnesses due to ineffective food and feed management and failure to take preventive measures to ensure food safety.	Negative	Potential	Directly caused by the Group	Own operations and downstream	Brief
	<b>Nutrition and well-being through quality products</b> The organisation guarantees the provision of quality, safe, and nutritious products that meet the dietary needs and food preferences of people for an active and healthy life in the developing countries where INALCA operates.	Positive	Current	Directly caused by the Group	Own operations and downstream	Brief
ESRS G1 BUSINESS CONDUCT	<b>Excessive use of antibiotics in livestock farming</b> Negative impacts on animal and consumer health resulting from excessive use of antibiotics during breeding.	Negative	Potential	Directly caused by the Group and linked through a business relationship	Upstream and own operations	Brief
	<b>Harm to stakeholder communities (local and distant) due to failure to implement ESG purchasing policies</b> Negative impacts on stakeholder communities due to failure to implement ESG purchasing policies and/or supplier assessments for human rights risks and physical damage (e.g. deforestation).	Negative	Potential	Directly caused by the Group	Upstream	Brief

ESRS TOPIC	DESCRIPTION OF RISK / OPPORTUNITY	TYPE	POSITION IN THE VALUE CHAIN	TIME HORIZON
ESRS E1 CLIMATE CHANGE	<b>Competitive and financial risks related to greenhouse gas emissions.</b> Increases in direct (Scope 1 and 2) and indirect (Scope 3) emissions could increase compliance costs, the risk of penalties, and reduce competitiveness. High Scope 3 emissions, in particular, could generate pressure from stakeholders, limit access to sustainable financing, and damage corporate reputation, increasing the risk of market loss in an increasingly sustainability-oriented environment.	Risk	Upstream, own operations and downstream	Medium
	<b>Changing consumer preferences towards sustainable products.</b> The increasing demand for sustainable products and consumers' growing concern about the environmental impact of their choices could negatively impact Inalca's revenues if its offerings do not promptly align with these new needs.	Risk	Downstream	Medium
	<b>Costs of decarbonising the value chain.</b> The need to reduce emissions along the value chain (Scope 3) could generate additional costs for the Group, resulting from the adoption of sustainability criteria for suppliers and partners, the conversion of production processes, and the search for raw materials with lower environmental impact. Furthermore, any technological or economic barriers in upstream sectors could slow the effectiveness of mitigation strategies, impacting competitiveness and compliance with environmental regulations.	Risk	Upstream and downstream	Medium
	<b>Energy market instability.</b> The lack of an effective energy diversification strategy, with limited adoption of renewable sources, could make the Group more vulnerable to market shocks and interruptions in energy supply due to extreme weather events. Furthermore, increased energy price volatility, influenced by climate and geopolitical factors, could increase operating costs and reduce competitiveness.	Risk	Own operations	Brief
	<b>Increased independence from energy markets and reduced supply costs.</b> Investing in self-generated energy from renewable sources (photovoltaic, cogeneration, biogas from agri-food waste) and adopting energy efficiency measures can reduce dependence on external suppliers, stabilise procurement costs, and improve the Group's resilience to energy market fluctuations.	Opportunity	Own operations	Brief
	ESRS E4 BIODIVERSITY AND ECOSYSTEMS	<b>Invasive exotic species in crops and livestock.</b> The accidental introduction of invasive exotic species, such as viruses or epidemics, into livestock farms could cause a shortage of the final product with consequent economic losses.	Risk	Upstream
<b>Degradation of agricultural and rural ecosystems.</b> Soil degradation caused by unsustainable agricultural and livestock practices leads to a loss of agricultural capacity and a consequent reduction in feed availability and quality, thus threatening the stability and resilience of Inalca's operations.		Risk	Upstream	Long
ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY	<b>Creating co-products from waste for new business lines.</b> Using production waste to create new by-products for use in other industries, such as pharmaceuticals, biomedical products, leather goods, cosmetics, and animal feed, could open up new business lines. This circular approach not only reduces waste but also generates economic opportunities, helping to diversify revenue sources and improve the Group's overall profitability.	Opportunity	Upstream	Long

ESRS TOPIC	DESCRIPTION OF RISK / OPPORTUNITY	TYPE	POSITION IN THE VALUE CHAIN	TIME HORIZON
ESRS S1 OWN WORKFORCE	<b>Risk of penalties for non-compliance in health and safety.</b> Failure to comply with workplace health and safety regulations can lead to increased injuries, legal damages and financial penalties, negatively impacting both costs and a company's reputation.	Risk	Own operations	Brief
	<b>Risk of breach of personal data privacy.</b> Improper handling of employee personal data could expose the company to privacy violations, with significant financial impacts resulting from fines, penalties, and reputational damage.	Risk	Own operations	Brief
ESRS S2 WORKERS IN THE VALUE CHAIN	<b>Non-compliant working conditions and hours in the value chain.</b> The lack of controls on working conditions and hours, especially among suppliers in the livestock and logistics supply chain, can lead to risks of accidents, exploitation and/or overload, injuries, and workplace stress. This could result in fines, lawsuits, and reputational damage for the Group.	Risk	Upstream and downstream	Medium
	<b>Cases of child and forced labour along the value chain</b> The lack of adequate human rights controls in the value chain can foster situations of child exploitation and forced labour, with consequent legal, reputational, and commercial impacts for Inalca, aggravated by the evolution of European regulations on mandatory due diligence.	Risk	Upstream and downstream	Brief
ESRS S4 CONSUMERS AND END USERS	<b>Opposition from consumer groups and activists.</b> Inadequate management of protests by groups opposed to Inalca's business (such as environmentalists or animal rights groups) could generate reputational damage and operational impacts, affecting relationships with customers, suppliers, and investors.	Risk	Downstream	Brief
	<b>Non-compliance of products with food safety standards.</b> The distribution of products that do not comply with regulations, quality standards or are potentially harmful to customers can lead to financial penalties, recall costs and reputational damage, compromising stakeholder trust and financial performance.	Risk	Downstream	Brief
	<b>Creation of new product lines.</b> The development of new product lines that respond to growing consumer demand for more sustainable products could represent a source of economic development for the Group.	Opportunity	Downstream	Medium
ESRS G1 BUSINESS CONDUCT	<b>Risk of non-compliant animal welfare practices on corporate farms.</b> The presence of practices that do not comply with animal welfare on Inalca farms could lead to strong criticism from consumers and associations, resulting in a loss of trust and the risk of regulatory sanctions.	Risk	Own operations	Brief

ESRS 2  
IRO-1

### DESCRIPTION OF THE PROCESS TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

Double Materiality, a new element outlined in the CSRD (Corporate Sustainability Reporting Directive), is a fundamental pillar of the methodology implemented by INALCA for identifying relevant material topics, in accordance with the ESRS (Commission Delegated Regulation (EU) 2023/2772 of 31<sup>st</sup> July 2023). This methodological approach, defined by the European Commission within the CSRD, requires assessing sustainability issues both from the perspective of the company's impact on the environment and society (inside-out approach) and from a financial perspective, i.e., the influence of environmental and social factors on the company itself (outside-in approach). The objective is to identify the most relevant issues to report, defined as "impacts, risks, and opportunities" (IROs).

INALCA conducted the Dual Materiality analysis following the indications contained in EFRAG IG 1 – **Materiality Assessment Implementation Guidance**. The process originated from the impact materiality assessment carried out in relation to the 2022 Sustainability Report, according to GRI (Global Reporting Initiative) standards. The Sustainability Team initially defined the relevance of the impacts relating to the 2022 financial year and subsequently further explored them through a survey of representative stakeholder categories. In the current financial year, the previously identified material topics were correlated with the sustainability issues listed in Appendix A, AR 16 ("Sustainability issues to be included in the materiality assessment") of ESRS 1, forming the basis for the development of the impact and financial materiality assessments for 2024. The results of this comparison were validated by the Sustainability Team, which also identified the internal stakeholders to be involved in assessing the materiality of both the impacts and financial aspects relating to the reporting year. This year, the process was conducted with the sole consultation of Top Management (including the main functions within the administrative, management, and control bodies), with the aim of re-examining previous assessments in light of changes in the context and the evolution of corporate strategies, thus strengthening the ongoing alignment between internal vision and external ESG expectations.

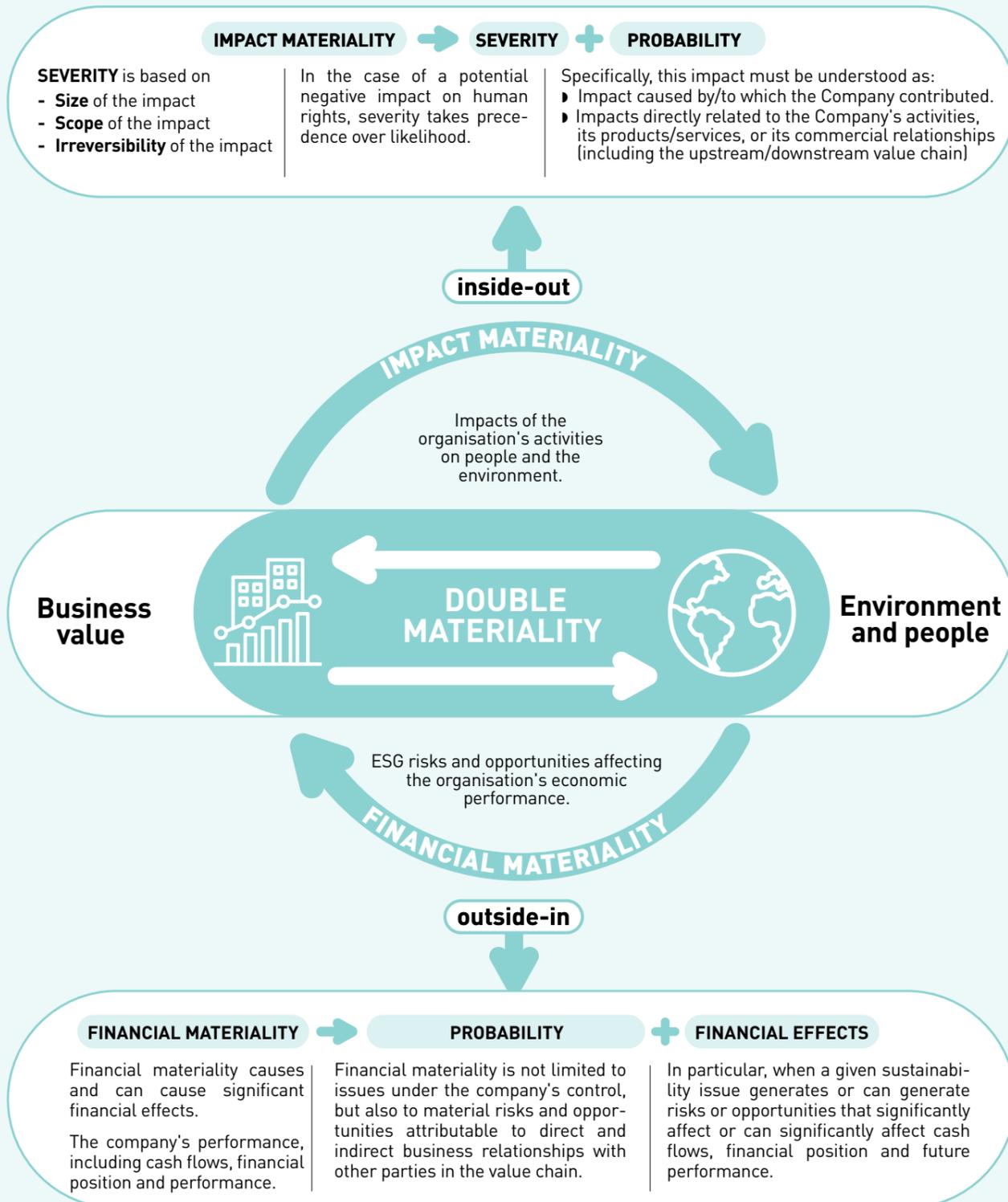
For each impact, risk, and opportunity identified through the Dual Materiality process, the connection to company activities across the entire value chain was indicated: upstream, in internal operations, and downstream. Furthermore, each element was characterised according to a time horizon—**short, medium, or long** term—representing the period within which it could impact the company's economic, financial, and operational performance, as well as generate impacts on the environment and society.

<sup>1</sup> The various categories of stakeholders include: employees, suppliers (workers along the value chain) and customers. Among the various categories of stakeholders, INALCA has also identified local communities, academic research institutions, credit institutions, as well as the main trade associations related to the business.

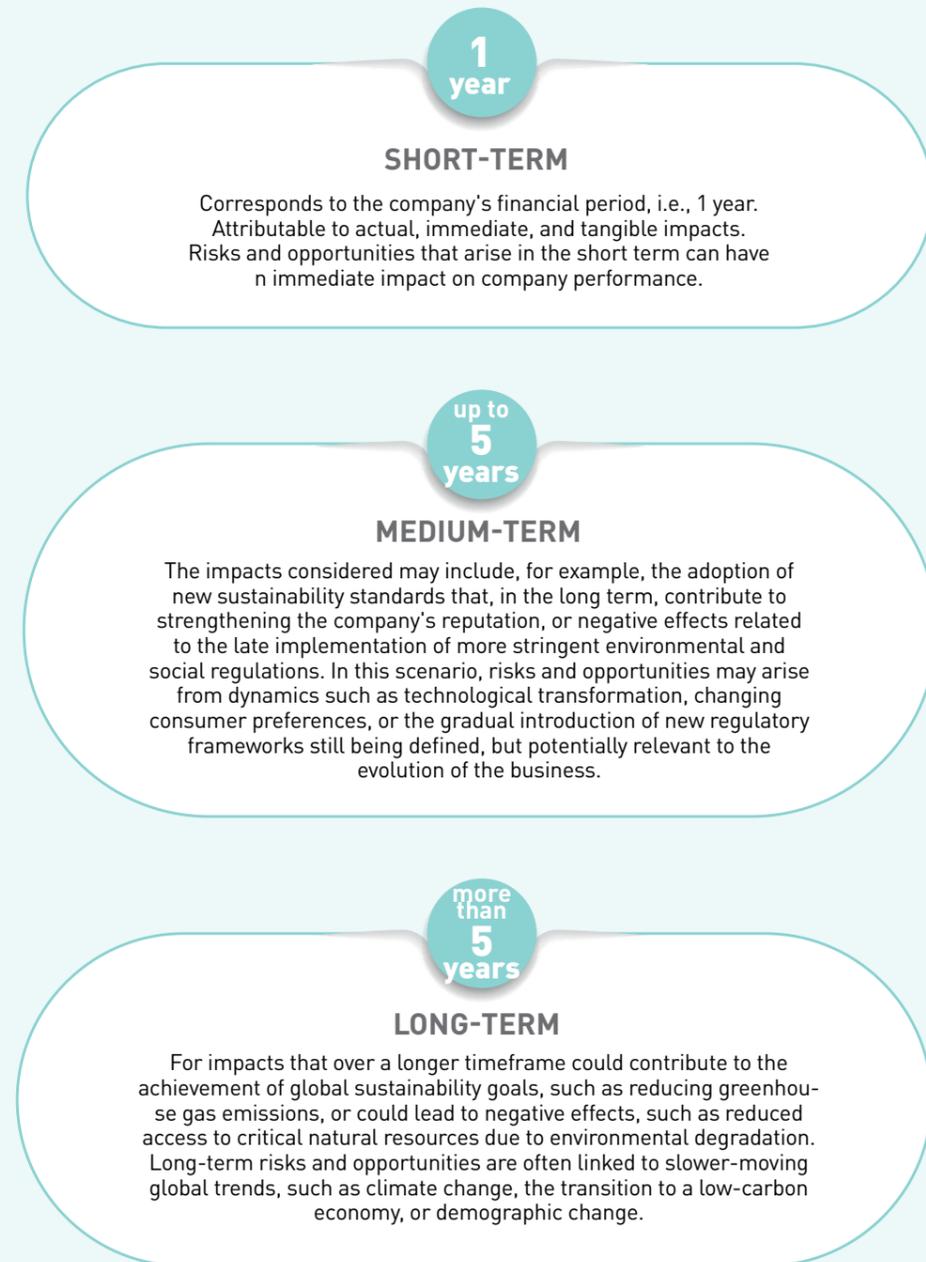
## FOCUS ON DOUBLE MATERIALITY

The CSRD introduces the concept of “**Double materiality**” according to which companies must provide information both about the impact of their activities on people and the environment (**inside-out**) and about how sustainability issues affect them (**outside-in**).

A specific topic/disclosure meets the Double materiality criterion if it is material from an impact or financial perspective, or both.



For each impact, risk, and opportunity identified in the double Materiality Report, in addition to identifying the connection with company activities along the entire value chain (**upstream, own operations, and downstream**), it is necessary to indicate the time horizon—**short, medium, or long**—over which it is expected to impact the company or the environment and society.



**IMPACT MATERIALITY**

To verify and assess the significance of the actual and potential positive/negative impacts identified in relation to the ESRS topics of AR 16, the company's top management (including some members of the administrative, management and control bodies) reporting to the Sustainability Team were involved. Among the impacts considered, some of those identified in the materiality analysis for the 2022 financial year, conducted according to the "GRI 3: Material Topics" Standard, were also examined and retained, in order to take into account the contribution of external stakeholders (customers, sales force, and suppliers) involved in the previous financial year. Each identified impact was described and justified. The assessment of the materiality of each impact was carried out based on **severity** (or relevance), analysing:

- ▶ **Magnitude:** how serious is the negative impact or how many benefits does the positive impact bring to people or the environment;
- ▶ **Scope:** how widespread are the positive or negative impacts. For environmental impacts, the magnitude can be understood as the extent of environmental damage or a geographic perimeter. For impacts on people, the magnitude can be understood as the number of people affected;
- ▶ **Irremediability:** whether and to what extent the negative impacts can be remedied, i.e., restoring the environment or the affected people to their original state.

Potential impacts have an additional evaluation parameter: **probability**.

Each parameter was assessed on a scale of 1-5, and a **total score of  $\geq 10.5$**  was defined as the **impact relevance threshold**. The resulting value for each impact is the **product of severity and probability**, ranging from 1 to 25. Given the growing relevance of impacts related to human rights, as confirmed by recent UN reports, it was decided to apply a **factor that gives priority to severity over probability**. In practice, in addition to the usual multiplication of severity and probability scores, an additional multiplier has been introduced: a **correction factor** calculated so that, when applied to the severity value (as defined by internal and external stakeholders), it yields a final score of 5 (i.e., the maximum severity score attributable to an impact). gravità per un impatto).

The impacts subject to the above criterion were:

- ▶ **ESRS S1 (Own Workforce)** - "Adverse impact on human rights and tenure rights resulting from suppliers' use and management of land and natural resources, with possible repercussions on local communities"
- ▶ **ESRS S1 (Own Workforce)** - "Violations of human rights related to freedom of association and collective bargaining within the organisation"
- ▶ **ESRS S2 (Workers in the Value Chain)** - "Ineffective management of working conditions along the company's value chain, which does not guarantee the human right to freedom from forced labour and child labour"
- ▶ **ESRS S2 (Workers in the Value Chain)** - "Violations of human rights related to freedom of association and collective bargaining in INALCA's value chain"
- ▶ **ESRS S3 (Stakeholder communities)** - "Adverse impact on human rights and tenure rights resulting from suppliers' use and management of land and natural resources, with possible repercussions on local communities"

When considering the materiality of an ESRS topic, the maximum score among the impacts related to the topic was used.

Using this methodology, even if there is only one material impact, the ESRS topic becomes material and therefore subject to reporting.

**FINANCIAL MATERIALITY**

To perform the **Financial Materiality analysis**, a top-down approach was used, thus identifying and assessing risks and opportunities regarding the sustainability issues proposed in AR-16 of ERSR 1. The analysis was conducted during a workshop led by the Sustainability Team, in collaboration with the company's top management, including the CEO and CFO of the INALCA Group, as well as the Sustainable Development Department.

Each risk or opportunity was then assessed based on the following characteristics:

- ▶ **Magnitude:** Magnitude measures the potential financial impact compared to the materiality thresholds defined by the organisation. It is used to assess whether risks and opportunities have sufficient financial weight to meet or exceed the established materiality criteria;
- ▶ **Probability:** Probability assesses the likelihood of the risk or opportunity occurring, helping to define targeted actions based on the potential impact on the financial statements.

A **total score of  $\geq 8$**  was defined as the materiality **threshold for risks and opportunities**. In considering the materiality of ESRS topics, the highest score among the risks and opportunities related to the ESRS topic was used. Following this methodology, even if there is only one significant risk or opportunity, the topic is material and must be reported.

**DETAILS OF IRO EVALUATION PROCESS FOR SINGLE TOPIC**

**ESRS E1 Climate Change**

In order to understand and adequately address the challenges arising from climate change, INALCA has paid particular attention to the impacts related to greenhouse gas (GHG) emissions already in the identification phase. In particular, an in-depth analysis of the company's activities was conducted, taking into account the complexity of the value chain, with the aim of identifying the main sources of emissions. The significant impacts identified are directly linked to activities that are strategic to the success of INALCA's business model, such as livestock **farming, production, processing, and transportation of meat**. To assess these impacts, INALCA adopted an integrated approach based on both quantitative and qualitative methods. On the one hand, internationally recognised calculation models were used to quantify GHG emissions; on the other, future scenarios were analysed, considering the evolution of environmental regulations, potential changes in energy costs, as well as the impact of corporate emissions on market dynamics, in a context of growing consumer and investor attention to sustainable practices.

The results of this analysis served as the basis for identifying risks and opportunities related to climate change.

INALCA also conducted a qualitative assessment of the effects of risks and opportunities along the entire value chain. Specifically, risks related to energy market instability were considered: the lack of effective energy diversification strategies, combined with limited adoption of renewable sources, could make the Group vulnerable to market shocks and interruptions in energy supply due to extreme weather events. Furthermore, increased energy price volatility, influenced by climate and geopolitical factors, could increase operating costs and reduce the Group's competitiveness. INALCA may also be exposed to competitive and financial risks related to its greenhouse gas emissions, in a context where environmental regulations are becoming increasingly stringent and the costs associated with decarbonization are rising. At the same time, changing consumer preferences toward more sustainable products could influence demand, requi-

ring continuous adaptation of supply to maintain market competitiveness. However, this situation also represents an opportunity: INALCA's investments in self-generation of energy from renewable sources contribute to increasing independence from energy markets and reducing procurement costs, strengthening the resilience and sustainability of the business model. Three climate-related transition risks have currently been identified in its own operations or along the value chain. These risks are identified as transition risks, as they are linked to the shift towards a low-emission and more sustainable economy, both at the regulatory and market levels. The first concerns **competitive and financial risks related to greenhouse gas emissions**. Increased emissions, particularly indirect emissions (Scope 3), can lead to higher compliance costs, fines, and a loss of competitiveness. Furthermore, it could limit access to sustainable financing and damage the company's reputation, increasing the risk of market loss. This is a transition risk because it stems from growing regulatory, financial, and social pressure to decarbonize. A second risk concerns **changing consumer preferences**, increasingly oriented toward sustainable products. If the company fails to adapt its offerings promptly, it could experience a negative impact on revenue. This is also a transition risk, linked to evolving market expectations regarding environmental issues. Finally, the risk associated with the **costs of decarbonizing the value chain** reflects the difficulties and investments required to reduce Scope 3 emissions. Adapting suppliers, processes, and raw materials can lead to additional costs and technological obstacles, potentially impacting competitiveness and environmental compliance. This risk also falls within the context of the transition to more sustainable production models.

#### **ESRS E2 Pollution and ESRS E3 Water and Marine Resources**

During the Dual Relevance analysis, both the company's own operations and all activities along the entire value chain, both upstream and downstream, were examined to ensure an integrated and comprehensive approach when identifying potentially significant impacts, risks, and opportunities related to the pollution and use of water and marine resources. The analysis highlighted the significant relevance of these issues not only in direct operational activities but also in the upstream phases of the value chain. In particular, atmospheric emissions from production processes, as well as water and soil pollution associated with livestock farming, emerged as critical.

These emissions represent a significant source of environmental impacts, contributing to phenomena such as water resource pollution, soil degradation, and air contamination.

Recognising these aspects allows for more effective targeting of environmental management and sustainability strategies, aiming to minimise overall impacts along the entire value chain and promote more sustainable practices both internally and among suppliers and other stakeholders involved.

Regarding the risks and opportunities related to pollution and water conservation, it should be noted that, although analysed as part of the financial materiality assessment, they did not meet the defined materiality threshold. Therefore, they were not considered financially material.

#### **ESRS E4 Protection of Biodiversity and Ecosystems**

During the significance assessment phase, INALCA examined the nature of environmental impacts along its value chain, with particular attention to agricultural and livestock activities. The analysis took into account both the degree of direct connection between the impacts and the Group's activities and the scale and scope with which these impacts may manifest themselves in the short and medium term. In particular, attention was focused on the impacts of cultivation and livestock farming practices on natural ecosystems and soil health. The negative effects associated with erosion and loss of soil fertility, as well as the decline in biodiversity resulting from intensive agricultural and livestock farming practices, including the use of pesticides, were identified as material. These impacts are current and directly caused by the Group or closely linked to business relationships, particularly in the upstream phases of the value chain. In the risk identification process, the Group also considered exposure to physical and systemic risks that could impact operational resilience and the availability of raw materials. Among these, the accidental introduction of invasive exotic species, such as viruses or epidemics in livestock farming, was assessed, which could lead to a shortage of final products and therefore significant economic losses.



Another significant physical risk is the degradation of agricultural and rural ecosystems caused by unsustainable practices, which can reduce the productive capacity of the land and compromise the availability and quality of feed. This could negatively impact INALCA's stability and operational efficiency, generating economic implications along the entire supply chain. These considerations have led to the definition of a framework of environmental risks and impacts that, while primarily occurring in the upstream phases, are closely linked to the Group's business model, with potential repercussions in terms of costs, access to resources, and corporate reputation.

### **ESRS E5 Circular Economy**

During the dual relevance analysis process, INALCA carefully assessed not only its own direct activities, but also those of stakeholders along the value chain, both upstream and downstream.

This inclusive approach allowed us to comprehensively identify the impacts, risks, and opportunities associated with resource use and circular economy principles, with a particular focus on outgoing material flows and waste management. The qualitative analysis highlighted the relevance for the Group of both incoming flows, related to the consumption of food and packaging raw materials, and outgoing flows, in terms of waste and production scraps. In particular, the intensive consumption of food and packaging raw materials - such as plastic, paper, cardboard, wood, and metal - represents a direct and current negative impact, closely linked to INALCA's production and commercial activities.

Furthermore, the Group recognises the importance of reducing environmental impacts through the adoption of circular economy practices. Initiatives to recover and reduce production waste, for example through recycling or transformation into co-products, represent positive opportunities. These co-products are used in sectors such as agriculture, where digestate can replace chemical fertilisers, as well as in the pharmaceutical, pet food, tanning, biomedical, and bioenergy industries, helping to reduce the need for virgin raw materials and limit the production of hazardous and non-hazardous waste. The recycling and reuse of waste and by-products, along with the energy recovery of waste materials such as biogas, represent concrete tools for INALCA to improve environmental sustainability while simultaneously generating economic value. Furthermore, the creation of new co-products derived from production waste opens up prospects for the development of new business lines, potentially capable of diversifying revenue sources and improving the Group's long-term profitability.

Finally, the Group pays particular attention to waste generated along the entire value chain, aware that its efficient management is essential to reducing overall environmental impacts, including preventing food waste and limiting the degradation of ecosystems due to packaging waste.

### **ESRS G1 Corporate Conduct**

The process of identifying impacts, risks, and opportunities related to INALCA's corporate conduct considered the Group's activities and those of the value chain, assessing the nature of their operations, the sectors they serve, the geographical areas involved, and applicable national and international regulations. In this context, INALCA has demonstrated a strong commitment to adopting responsible practices, particularly in the area of animal welfare, with programs and protocols that go beyond regulatory requirements to ensure product quality and safety and compliance with ethical standards. Among the potential negative impacts identified, the excessive use of antibiotics in livestock farming is an area that requires constant monitoring, although internal policies and best practices already implemented contribute to significantly reducing this criticality, protecting the health of animals and end consumers.

Furthermore, the importance of ESG purchasing policies was considered, as they are crucial for preventing negative impacts on stakeholder communities and ensuring that suppliers comply with ethical and environmental criteria, with particular attention to human rights and the prevention of

phenomena such as deforestation. INALCA continues to strengthen these assessment and monitoring processes along the supply chain to mitigate these risks.

Finally, regarding transition risks, animal welfare management remains a strategic priority. Although the Group has already adopted high standards and continues to invest in training and monitoring, the possible presence of non-compliant practices on farms could still represent a source of reputational and regulatory risk. For this reason, INALCA maintains a proactive approach to prevent critical issues and ensure full compliance, thus enhancing consumer trust and the sustainability of its business model.

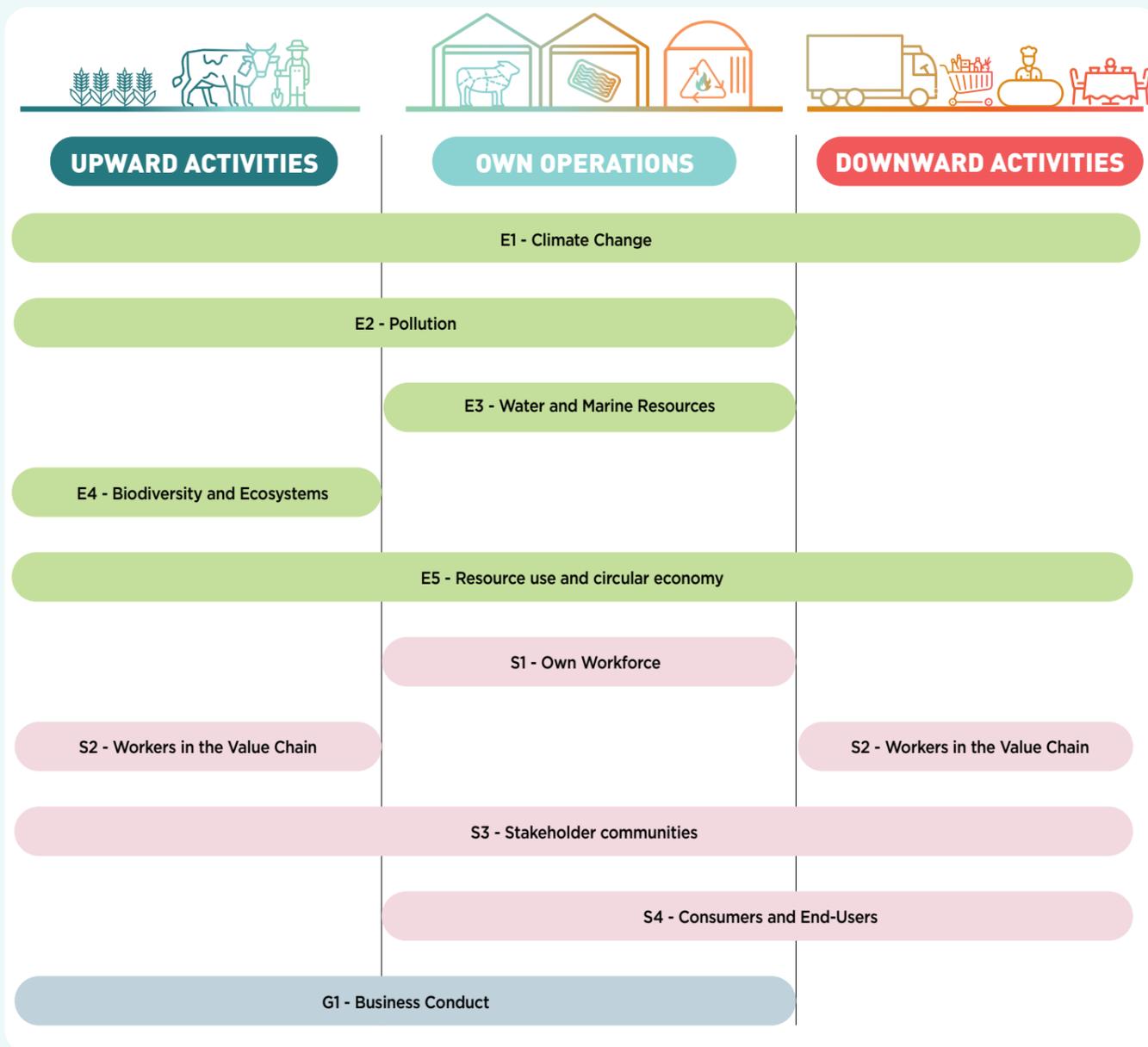
**CONCLUSIONS: DOUBLE MATERIALITY ANALYSIS**

The two aforementioned analyses were integrated to develop a comprehensive mapping and a coherent analysis of the impacts, risks, and opportunities relevant to the INALCA Group. The Dual Materiality analysis, conducted in accordance with the requirements of the CSRD Directive and the ERS standards, allowed us to identify and prioritise the Group's most relevant sustainability topics, considering both the impact on the environment and society (impact materiality) and the potential financial implications (financial materiality). The results highlight the strategic areas on which to focus corporate action, enabling proactive risk management and the exploitation of opportunities connected to the sustainable transition.

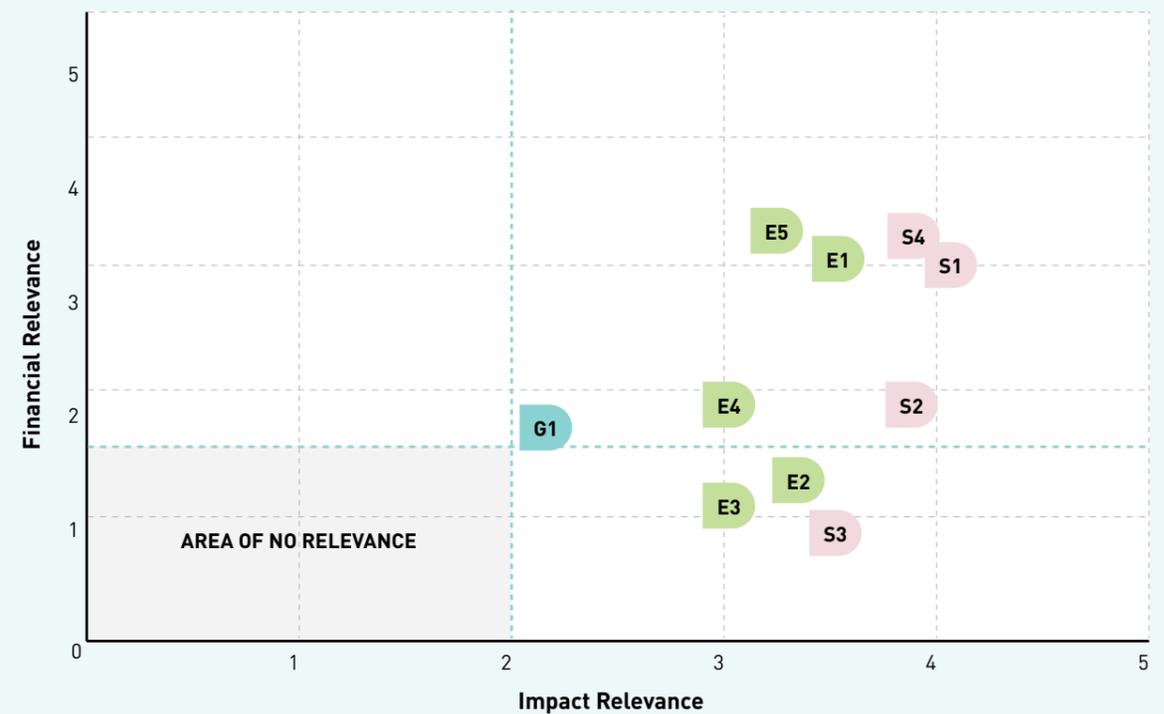
This assessment forms the basis for transparent and integrated reporting, as well as for aligning sustainability strategies with the Group's long-term objectives.

The analysis highlighted the relevance of specific topics - such as climate change, animal welfare, workforce protection, resource use, and the circular economy - which stood out for their significant environmental and social impact as well as potential economic and financial benefits. These areas will be subject to continuous monitoring and targeted initiatives within the context of the company's strategy.

**RELEVANT TOPICS AND VALUE CHAIN**



**DOUBLE RELEVANCE MATRIX 2024 - INALCA GROUP**



**RELEVANT SUBTOPICS**

- Climate change adaptation (E1)
- Climate change mitigation (E1)
- Energy (E1)
- Air pollution (E2)
- Water pollution (E2)
- Soil pollution (E2)
- Water (E3)
- Marine resources (E3)
- Factors with direct impact on biodiversity loss (E4)
- Impacts on the extent and condition of ecosystems (E4)
- Resource inflows, including resource use (E5)
- Resource outflows related to products and services (E5)
- Waste (E5)
- Working conditions (S1)
- Equal treatment and opportunities for all (S1)
- Other work-related rights (S1)
- Working conditions (S2)
- Other work-related rights (S2)
- Economic, social, and cultural heritage of communities (S3)
- Personal safety of consumers and/or end-users (S4)
- Information-related impacts on consumers and/or end-users (S4)
- Social inclusion of consumers and/or end-users (S4)
- Animal welfare (G1)
- Supplier relationship management (G1)

**DISCLOSURE REQUIREMENTS IN ESRS COVERED BY THE UNDERTAKING'S SUSTAINABILITY STATEMENT**

TABLE OF CONTENTS OF THE SUSTAINABILITY REPORT  
TABLE WITH REFERENCE TO OTHER EU LEGISLATIVE ACTS  
COMPLETE MDR TABLE RELATING TO POLICIES, ACTIONS, AND OBJECTIVES:

- ▶ **MDR-P – Policies adopted to address material sustainability issues;**
- ▶ **MDR-A – Actions and resources related to material sustainability issues;**
- ▶ **MDR-T – Monitoring the effectiveness of policies and actions through targets;**

For these disclosure requirements, please see pages 158-165.



**ENVIRONMENTAL  
INFORMATION**

## ESRS E1 - Climate Change

ESRS E1-1

### TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

Within the framework of the Sustainable Development Goals of the UN 2030 Agenda—which promote a balance between environmental, economic, and social dimensions—the fight against climate change and the promotion of sustainable production models represent challenges shared by institutions, businesses and citizens. In this context, INALCA recognises the strategic importance of addressing the transition to a low-carbon economy and over nearly 30 years, has made a concrete commitment to the environment. The Group monitors its greenhouse gas emissions (scopes 1, 2, and 3) with the aim of collecting reliable data and building a solid knowledge base. This approach allows the organisation to have a clear view of its environmental footprint and represents a fundamental first step towards the potential development of a transition plan for climate change mitigation. Analysis of the collected data, along with the evolution of the regulatory environment and stakeholder expectations, will guide assessments and strategic decisions regarding potential actions to reduce the climate impact of corporate activities. As evidence of its **ongoing environmental commitment**, several Group companies have achieved **ISO 14001** certification for their Environmental Management Systems.

View the Due Diligence



Furthermore, INALCA, fully aware of the challenges posed by climate change and the importance of integrating sustainability principles into its business model, conducted an in-depth **Due Diligence** study of its supply chain, which was concluded in December 2024. This process allowed for a systematic analysis of the risks and opportunities associated with climate change, assessing the impact of its activities along the entire value chain. The results of this analysis, which represent an important tool for transparency and accountability towards stakeholders, are available and accessible on the company's website.

The above will form the basis for evaluating the opportunity and possible methods of defining a transition plan, with a specific focus on greenhouse gas emissions and the associated consequences.

ESRS 2 SBM-3

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

INALCA, as part of its Dual Materiality analysis, has thoroughly analysed each risk related to climate change, distinguishing between **physical** and **transition** risks.

Three main transition risks related to climate change have been identified, with impacts both on business activities and along the value chain. These risks are attributable to the transition to a low-emission economy, influenced by more stringent regulations, new market dynamics, and evolving social expectations. The first risk concerns greenhouse gas emissions, particularly indirect emissions (scope 3), which can lead to higher compliance costs, penalties, difficulty accessing sustainable financing, and a loss of competitiveness due to potential reputational damage. A second risk is related to changing consumer preferences, which are increasingly sensitive to environmental issues and oriented toward diversified food choices. Failure to adequately address these changes could impact demand and, consequently, commercial performance. In this context, the company aims to respond with a range of products that meet a broad spectrum of nutritional needs, maintaining the centrality of its production while simultaneously promoting sustainability throughout the supply chain. Finally, decarbonizing the value chain entails significant investments and technological challenges, with potential impacts on competitiveness and the ability to ensure environmental compliance.

These risks, taken together, reflect the complexities and pressures associated with the transition to more sustainable production models. As part of the financial materiality analysis, INALCA conducted a first-level

resilience analysis to assess the business model's response to the main climate risks and opportunities identified. This qualitative exercise did not include reference to specific climate scenarios, temperature thresholds, or transition objectives, but was limited to an impact assessment in relation to the contextual conditions associated with the risks analysed. A resilience analysis has not yet been conducted in the context of impact materiality.

ESRS E1-2

### POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

A clear commitment to addressing various aspects of climate change is expressed in the company's policy and, more specifically, in the document **"INALCA Code of Conduct for Sustainable Corporate Development"**, which defines the guiding principles for environmental, social and governance matters, with a view to long-term responsibility and sustainability.

This policy is one of the tools through which INALCA conveys its commitment to environmental protection, including in relation to climate change issues. The document promotes practices aimed at **energy efficiency, pollution prevention, responsible management of resources, and the promotion of the circular economy**. It applies to all companies with a production presence, employees, collaborators, third parties operating under the organisation's control and was developed taking into account the operating context and discussions with key stakeholders. The implementation of the *INALCA Code of Conduct for Corporate Sustainable Development* is overseen by top management and communicated through the internal network and management systems. INALCA is also committed to complying with all applicable legal requirements and other obligations it has undertaken regarding the environment, energy, and sustainability, with a proactive approach to identifying risks and opportunities related to climate change.

It is important to note that, although the INALCA Code of Conduct for Corporate Sustainable Development addresses various aspects of environmental sustainability, there is currently no company policy specifically dedicated to climate change mitigation and adaptation. However, in light of recent regulatory developments, as well as the growing market and stakeholder attention to this issue, INALCA will evaluate the opportunity to develop a specific policy, possibly integrated into a future organisational greenhouse gas (GHG) management system, capable of defining objectives, responsibilities, and targeted actions in a structured manner.



ESRS  
E1-3

**ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES**

The fight against climate change and poverty, responsible production and consumption models, clean and accessible energy and the conscious use of natural resources are just some of the 17 goals defined by the UN in the 2030 Agenda for Sustainable Development. The latter is based on the integration and proper balance between three fundamental dimensions: environmental, economic, and social. Achieving these goals represents a global challenge that involves states, institutions, companies, societies, and individuals.

Thanks to a process of self-generation of energy initiated in the mid-1990s, INALCA is now able to generate a significant portion of its plants' energy needs independently. This achievement is the result of an integrated and distributed system of systems installed at the Group's main production sites and agricultural farms, including **photovoltaic systems, natural gas-powered trigeneration and cogeneration systems, cogeneration systems powered by renewable sources** (such as biogas and animal fats), and **anaerobic digestion systems** that use sewage sludge, manure, and other organic byproducts.

This infrastructure allows the Group to combine energy production from renewable sources (photovoltaics, anaerobic digestion, endothermic combustion) with high-efficiency cogeneration, thus ensuring high environmental sustainability and energy efficiency. Over nearly thirty years, INALCA has consistently pursued a strategy focused on self-generation of energy, the valorisation of byproducts, and the recycling and reuse of materials, in full **compliance with the principles of the circular economy**. Each resource is managed with a view to minimising waste and maximising its value, fuelling a virtuous cycle that integrates environmental sustainability and technological innovation.

In particular, within the agricultural sector, the Group is constantly committed to **improving livestock efficiency**, with the aim of reducing environmental impacts and energy consumption. Great attention is paid to waste recovery and the development of virtuous circular economy processes, with a focus on the use of animal waste and other biomass for the production of renewable energy (**biogas**) and natural fertilisers (**digestate**). To support these objectives, INALCA invests in modern and efficient plants capable of ensuring the integration of agricultural and industrial activities, promoting a resilient, circular, and energy-sustainable production model.

The following is a presentation of the actions undertaken regarding climate change, broken down by their main decarbonization drivers:

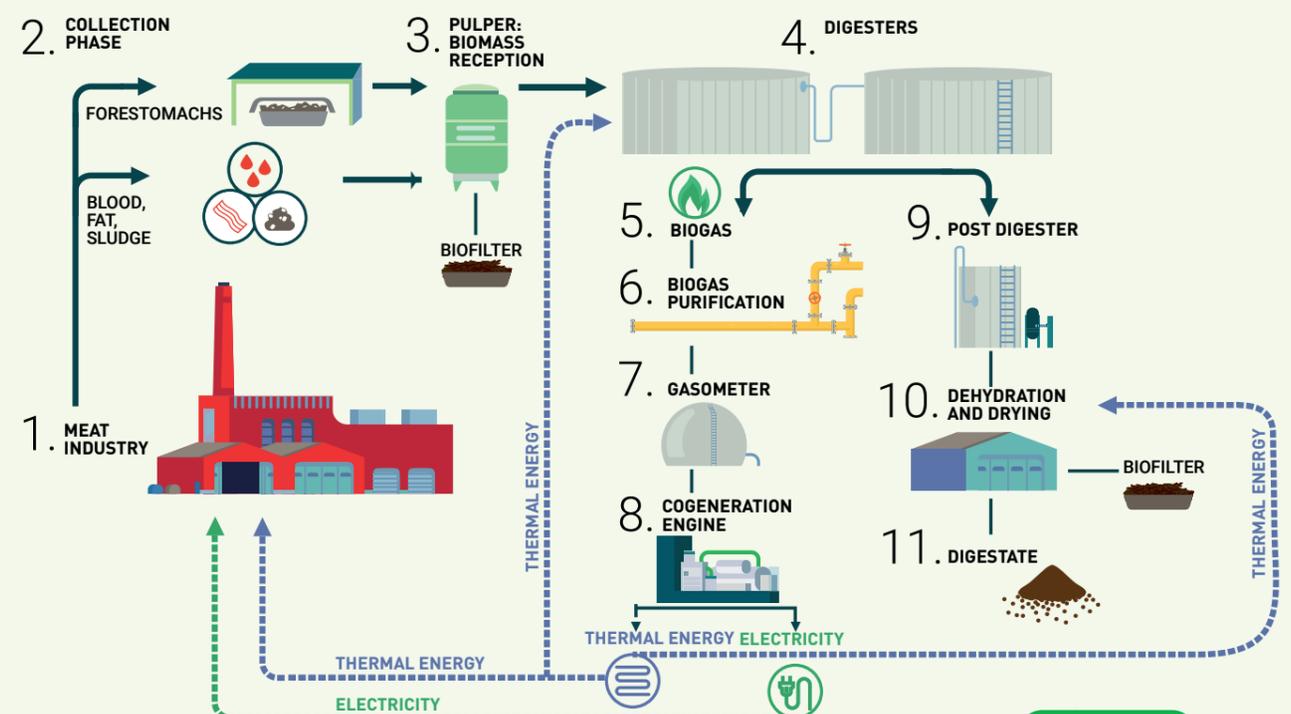
**Cogeneration/Trigeneration with natural gas and renewable sources**

Cogeneration systems represent INALCA's primary tool for improving its energy performance. INALCA currently operates **five natural gas-fired trigeneration engines** located at three of its main Italian plants (Castelvetro di Modena, Ospedaletto Lodigiano, and Rieti) and **two natural gas-fired cogeneration engines** at its Busseto site and its Polish plant, INALCA Poland, in Sochocin, with a total power output of 16.6 MW. These are complemented by **two cogeneration engines**, developed in partnership with the Tea Group of Mantua, powered by rendered animal fats, with a power output of 4.8 MW. Furthermore, in conjunction with the Group's desire to further strengthen its self-production of energy, a natural gas-fired trigeneration engine with a power output of 1.5 MW is planned to come online at the Gazoldo degli Ippoliti plant in 2026.

**Anaerobic digestion: from livestock by-products to biogas**

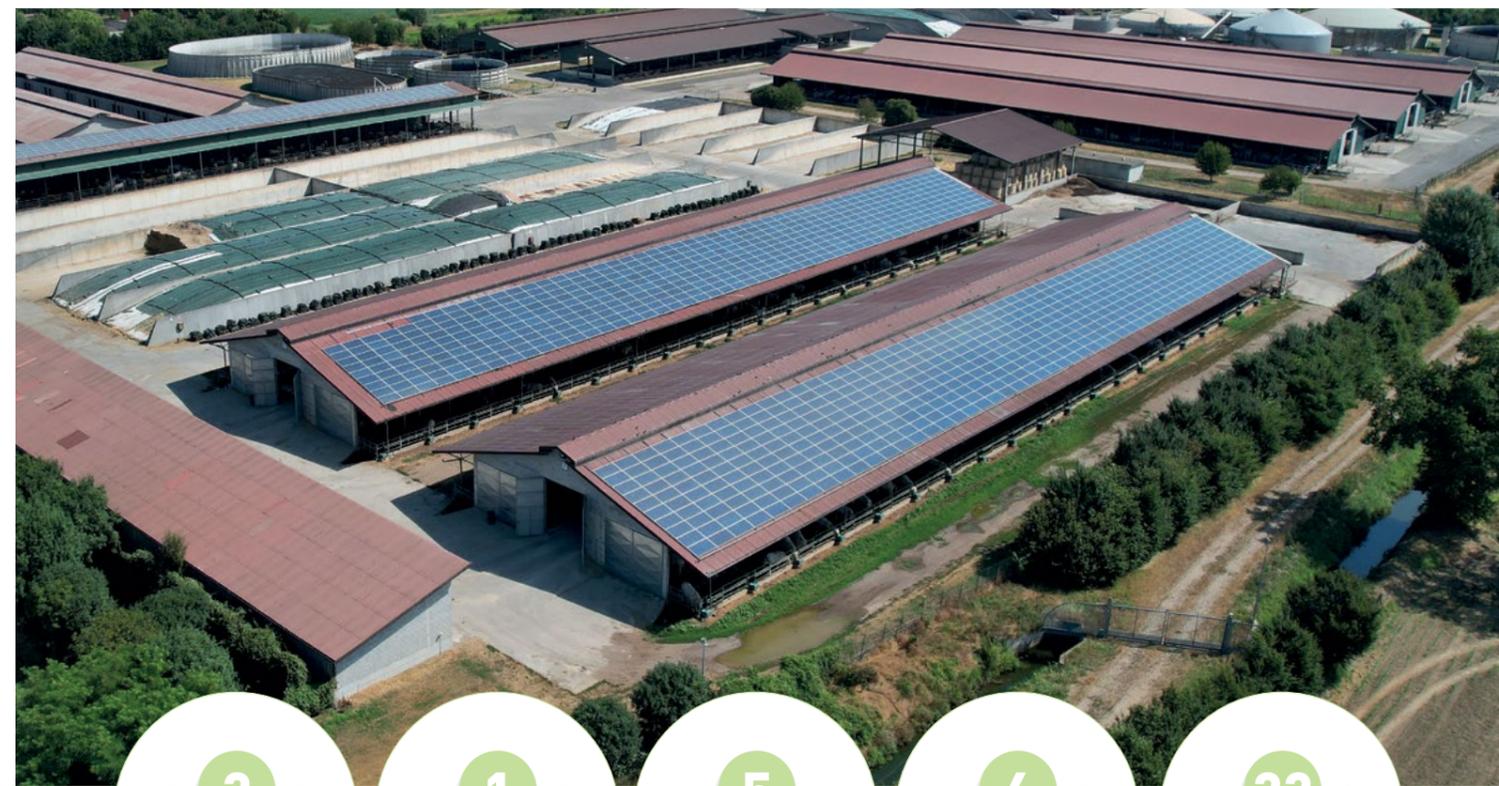
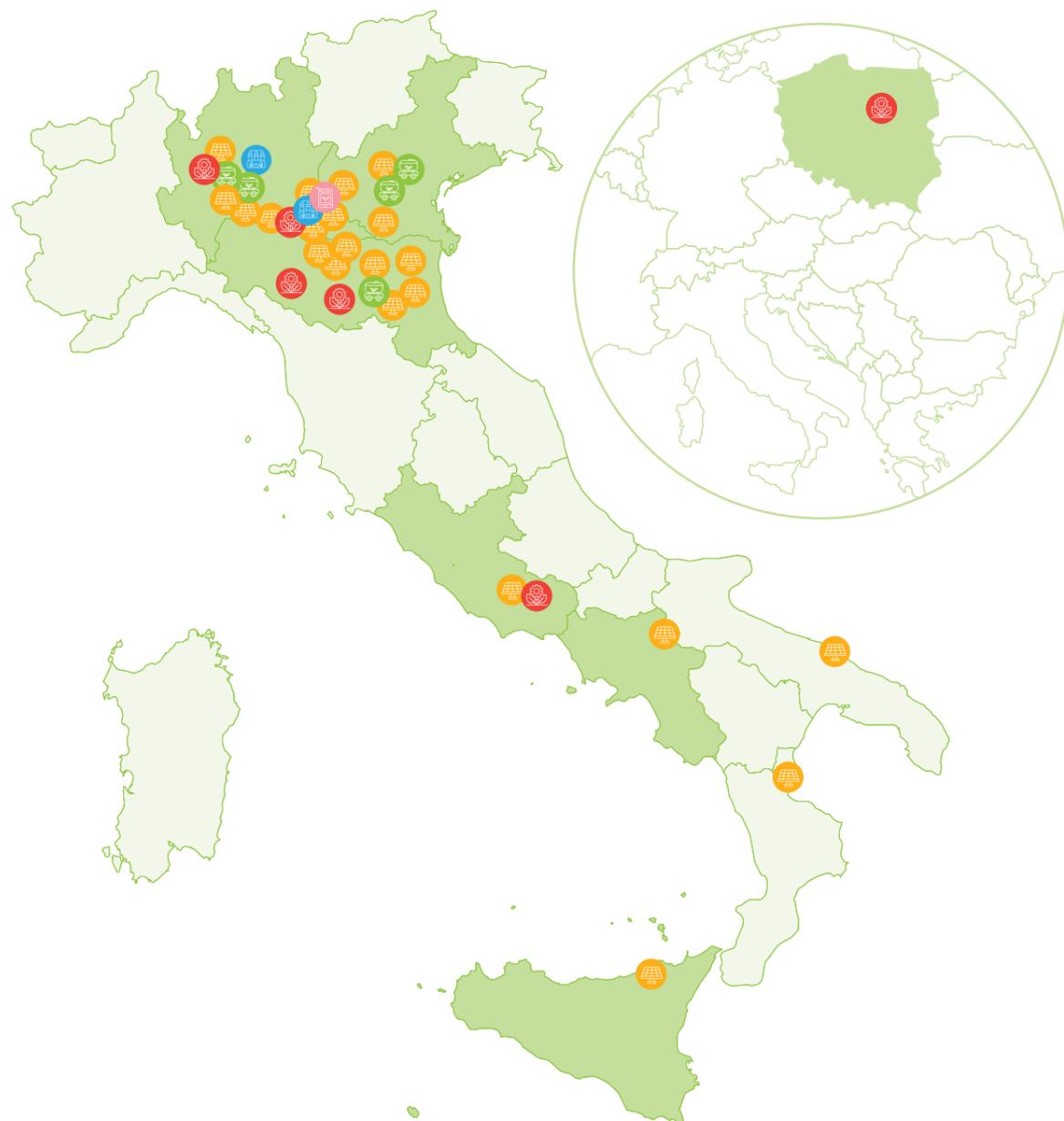
Alongside the aforementioned systems, INALCA has adopted another virtuous technology: anaerobic digestion. This technology is present at both industrial sites and livestock farms, with a total of **seven biogas plants** powered by sewage sludge, slaughterhouse byproducts, and manure, for a total capacity of 5.12 MW. In industrial plants, this technology enables the recovery of slaughterhouse waste and byproducts for biogas production, as in the Ospedaletto Lodigiano (1 MW) and Pegognaga (0.53 MW) plants. These plants enable the energy recovery of otherwise unusable biomass - such as sewage sludge and inedible animal byproducts (e.g., forestomach contents or manure from animal transport) - **contributing to the production of electricity and heat and the resulting reduction in fossil fuel consumption**. On livestock farms, green energy production relies on the use of manure and agricultural waste, also contributing to the reduction of fossil fuel use. Examples include the plants of Società Agricola Corticella S.r.l., located in Spilamberto di Modena (0.30 MW) and Zorlesco in the province of Lodi (0.30 MW), the two plants of Società Agricola La Torre located in Isola della Scala (VR), with a total capacity of 2 MW, and the anaerobic digestion plant at Azienda Agricola Marchesina (0.35 MW) in Rosate Milanese. Anaerobic digestion systems produce biogas that can be used to generate heat and electricity, but also - in the future - for the production of biomethane. **The Group's next challenge is biomethane**: an advanced fuel obtained from the refining of biogas, which can be used to power agricultural machinery, truck fleets for transporting meat, or directly fed into the grid. The biogas plants are currently being adapted to start producing biomethane starting in 2026.

**INDUSTRIAL BIOGAS PRODUCTION FLOW**



**Photovoltaic systems**

INALCA has also invested in solar energy, installing photovoltaic panels at several of the Group's production sites and farms. Among the active plants with the largest installed capacity are those in Ospedaletto Lodigiano (1.3 MW), Azienda Agricola La Torre (2.22 MW), Azienda Agricola Marchesina (0.99 MW), as well as the Italia Alimentari production sites in Busseto (0.95 MW) and Gazoldo degli Ippoliti (0.63 MW). Overall, INALCA has identified 22 sites for the installation of photovoltaic systems, some of which are already operational and the remainder are under construction or soon to be implemented, significantly contributing to its energy production from renewable sources. As proof of its commitment, starting in 2025, INALCA has planned to install nine photovoltaic systems, as well as expand four existing ones, for a total additional capacity of 8.80 MW. These will add to the 10.58 MW already in operation, for a **total installed peak capacity of 19,380 kW**.



**FARMS**

- ● **CORTICELLA** – Spilamberto (MO)
- ● **CORTICELLA** – Gualtieri (RE)
- ● **CORTICELLA** – Recovato (MO)
- ● **CORTICELLA** – Galvana (MO)
- ● **CORTICELLA** – Zorlesco (LO)
- ● ● **LA TORRE** – Isola della Scala (VR)
- ● ● **LA MARCHESINA** – Rosate Milanese (MI)

**PLANTS**

- ● ● **INALCA** – Castelvetro di Modena (MO)
- ● ● **INALCA** – Ospedaletto Lodigiano (LO)
- ● ● **INALCA** – Pegognaga (MN)
- ● ● **INALCA** – Rieti (RI)
- ● ● **INALCA** – Capo D'Orlando (ME)
- ● ● **INALCA** – Sienta (RO)
- ● ● **FIORANI E C. SRL** – Piacenza (PC)
- ● ● **FIORANI E C. SRL** – Castelnuovo Rangone (MO)
- ● ● **TECNO STAR DUE** – Spilamberto (MO)
- ● ● **ITALIA ALIMENTARI** – Gazoldo degli Ippoliti (MN)
- ● ● **ITALIA ALIMENTARI** – Busseto (PR)
- ● ● **CASTELFRIGO** – Castelnuovo Rangone (MO)
- ● ● **REALBEEF** – Flumeri (AV)
- ● ● **MONTAGNA** – Rossano Calabro (CS)
- ● ● **BEST ITALIAN MEAT** – Fasano (BR)
- ● ● **INALCA POLAND** – Sochocin (MZ, Poland)

**Purchase of electricity with Guarantee of Origin**

As part of its increasingly strong commitment to environmental sustainability, the INALCA Group has introduced a further commitment to reducing its environmental impact. Starting this year, in accordance with the incentive system established for energy-intensive companies, the Group **has purchased, for 2024, electricity from certified renewable sources** (therefore covered by a Guarantee of Origin) for a share equal to **35% of the needs of its most energy-intensive activities** – including INALCA, Fiorani, Italia Alimentari and Castelfrigo – for a total of 67,826 MWh, to which is added the quantity purchased from the company Macello di Parma, for a further share equal to **1,481 MWh**. In the following years, this initiative is planned to also include the companies Realbeef S.r.l. (2025) and Montagna (2026).

This initiative goes well beyond simple regulatory compliance: it represents a key element in the strategy to reduce its Carbon Footprint, particularly with regard to area 2 – *Market Based*. This is a concrete step toward the progressive reduction of climate-altering emissions associated with the Group's entire supply chain.

**Livestock manure management**

INALCA has long been using anaerobic digestion technologies, covering systems for manure storage sites, and immediate burial of manure during agronomic use to prevent the dispersion of GHGs into the atmosphere, on all its main farms within the scope of Area 1. Anaerobic digestion of manure currently allows the carbon and related methane to be recovered through biogas production, which can be used for energy purposes to generate electricity and heat. This process also reduces the use of fossil fuels. As part of its planned activities over the next three years, INALCA is evaluating the **expansion and upgrading of these plants** to produce biomethane for self-consumption in its own cogenerators. This technological evolution would not be limited to simply changing the energy carrier **from biogas to biomethane**, which allows for greater efficiency compared to biogas, but would also pave the way for further and more extensive forms of recovery, such as **carbon dioxide, which can be reused as packaging gas** to replace fossil-based carbon, as well as ammonium phosphate, which can be used as an advanced fertiliser in addition to the final product of anaerobic digestion (digestate). This technology enables additional and related recovery processes, which could be added to others, such as the **pyrolysis of digestate** for the production of **biochar**, a soil improver with significant carbon sequestration properties in agricultural soils. This integrated and systemic approach to this technology allows for the transition **from a simple renewable energy production plant to a biorefinery**, capable of providing a range of products and services essential for the application of regenerative agriculture techniques.

**MANURE MANAGEMENT – BETWEEN CIRCULARITY AND EFFICIENCY**



**Management of enteric fermentations on livestock farms**

INALCA's commitment to sustainability also extends to the management of livestock-related emissions, particularly **enteric methane**, which represents one of the most significant environmental challenges for the livestock sector. In this regard, INALCA's diligence plan for the three-year period 2024–2026 focuses on rigorous technical and scientific research. The objective is to evaluate the effectiveness of specific livestock supplements in reducing enteric methane emissions. This important research will be conducted on an Italian fattening farm owned by the Group and involves field trials of two innovative products:

- ▶ **Silvafeed® BX**: a formulation based on a natural blend of tannins and saponins, compounds known for their potential anti-methanogenic properties;
- ▶ **Anavrin®**: a complex blend combining essential oils, **tannins, and bioflavonoids**, designed to improve digestion and, consequently, mitigate greenhouse gas emissions;

Through this experimental approach, INALCA aims to identify practical and scientifically validated solutions to actively contribute to reducing the climate impact of its livestock supply chain. This approach is not new to the Group. For years, INALCA and its subsidiaries have been actively engaged, especially in sectors where they have the greatest influence—such as bullocks, heifer, and white-meat veal farming - in the development and fine-tuning of specific and efficient diets aimed at optimising enteric fermentation processes and consequently reducing methane production.

**Sustainable Mobility**

INALCA's commitment to sustainability is not limited to the production chain, but extends to every aspect of corporate life. In this context, INALCA has promoted **GREEN GO!**, an initiative aimed at encouraging sustainable mobility among its employees. The project has a dual purpose: to encourage the use of more eco-friendly means of transportation for home-work travel - such as bicycles, scooters, public transport, or carpooling - as well as serving as a measure to comply with the **Home-Work Travel Plan** (PSCL). This mobility planning document, in compliance with the Relaunch Decree (Legislative Decree 34/2020), is intended for companies with more than 100 employees located in provincial capitals (such as the Rieti office) or in municipalities with over 50,000 inhabitants. The initiative, which ran from October 1<sup>st</sup>, 2023, to December 31<sup>st</sup>, 2024, involved voluntary staff from the Rieti office. The **Wecity** platform calculated the carbon dioxide saved for each trip (approximately 1 kg for every 7 km travelled), transforming the effort into a competition with a final ranking.

Regarding its fleet of company cars, INALCA is continuing to actively promote the use of HVO (Hydrotreated Vegetable Oil) within the Group for employees using diesel-powered company vehicles. This low-emission, renewable fuel represents a valid alternative to traditional diesel, contributing to the reduction of climate-altering emissions. To support this initiative, the company provides periodic updates on available fuelling points throughout Italy, with a particular focus on those offering **HVO**.

Regarding road transport, at least 80% of the transport operations managed directly or contracted by INALCA were carried out with highly environmentally efficient vehicles, belonging to the Euro 5 or Euro 6 emission classes. Continuing this focus on logistics sustainability, in 2024 - as in 2023 - the share of methane-powered vehicles used by the transport companies the Group relies on increased. In the coming years, the company will also continue to strengthen the mapping and reporting of the downstream (post-sale) transport component, with the aim of obtaining a more complete and detailed view of the overall impact generated along its value chain.

TOPIC	DECARBONIZATION LEVERAGES	SPECIFIC ACTION
USE OF RENEWABLE ENERGY	Solar power generation	Installation of 23 photovoltaic systems for a total of 19.38 MWp by 2026
	Biomass power generation	7 anaerobic digestion (biogas) plants powered by industrial and agricultural waste – total capacity 5.12 MW
	Cogeneration from renewable sources	2 cogeneration plants powered by rendered animal fats – total capacity 4.8 MW
ENERGY EFFICIENCY	High-efficiency trigeneration	5 natural gas-fired trigeneration engines – total power 16.6 MW
	Methane cogeneration	2 cogeneration engines in Italy and Poland – additional power
	Self-consumption of energy	Integration of biogas and cogeneration to reduce the use of fossil fuels
LOGISTICS EFFICIENCY AND SUSTAINABLE MOBILITY	Use of low-emission vehicles	Over 80% of transports carried out with Euro 5/Euro 6 vehicles
	Increased use of alternative fuels	Increase in methane-powered vehicles in 2023 and 2024
	Low-emission fuels in the company fleet	Promotion of the use of HVO in diesel company vehicles
	Sustainable mobility for employees	GREEN GO! and PSCL project at the Rieti headquarters via the Wecity platform
EMISSIONS FROM LIVESTOCK (SCOPE 1)	Mapping of downstream logistics	Extension of after-sales transport reporting (Scope 3)
	Sustainable waste management	Anaerobic digestion, covering of storage sites, immediate burial
MITIGATION OF ENTERIC EMISSIONS	Innovative livestock additives	Trial of Silvafeed® BX and Anavrin® for the reduction of enteric methane
	Optimising diets on livestock farms	Studies on enteric fermentation in beef bovine (bullocks, heifers, white meat veal)



ESRS E1-4

TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

ESRS TOPIC	OBJECTIVE	TARGET	BASELINE	BASE VALUE	STATE OF PROGRESS
ESRS E1 CLIMATE CHANGE	Calculation of other indirect GHG emissions (Scope 3)	Calculation and/or estimation of all emission categories foreseen for scope 3 (GHG Protocol)	2020	scope 3 not calculated	5 out of 15 categories reported 33%
	Installation, expansion and activation of photovoltaic systems	100% of plants found suitable	2020	17% of existing establishments deemed suitable based on the latest update (2025)*	74% of existing plants deemed suitable based on the latest update (2025)* 74%
	Conversion to trigeneration of some existing plants and installation of new plants	CONVERSION TO TRIGENERATION: 100% of plants have cogeneration  NEW INSTALLATION: planned in suitable plants with specific energy needs	2020	CONVERSION TO TRIGENERATION: 0%  NEW INSTALLATION: 0%	CONVERSION TO TRIGENERATION: 75% of the plants where cogeneration is present 75%  NEW INSTALLATION 1 cogeneration plant at the INALCA Polish plant (Sochocin) 1 trigeneration plant at the Italia Alimentari plant (Gazoldo), scheduled for 2026

\* The progress of this objective, along with the related percentage, is subject to change due to any expansion of the scope of application, which could include new sites, in line with the evolution of corporate strategies and decisions, which are continuously updated over the years.

To pursue the long-term goal of reducing environmental impact and ensure timely monitoring of the actions undertaken, INALCA has defined specific objectives focused on the complete calculation of indirect greenhouse gas emissions (Scope 3), the installation and expansion of photovoltaic systems at eligible facilities, as well as the conversion of existing plants to trigeneration and the installation of new trigeneration and/or cogeneration systems at sites with specific energy needs. These initiatives are an integral part of INALCA's strategy to address the impacts of climate change by improving energy efficiency and promoting the use of renewable sources. During the financial year, INALCA deemed it necessary to further develop its emissions baseline. Despite having signed a commitment to the Science Based Target initiative (SBTi) in 2023 to define a near-term target, based on the in-depth analyses conducted and taking into account the complexity of its value chain, as well as its relative power of influence, INALCA has deemed it appropriate not to subscribe to SBTi targets. At this historical stage, INALCA believes it is a priority to continue its commitment to mitigation through its strategies and related improvement actions, in line with the soon-to-be-enforced European regulations, which are already fully aligned with the objectives of the Paris Agreement. In the meantime, INALCA monitors the progress and effectiveness of the actions undertaken through the quantitative indicators provided by the "sector-agnostic" ESRS Standards E1-5 and E1-6, reported below.

ESRS E1-5

ENERGY CONSUMPTION AND MIX<sup>1</sup>

ENERGY CONSUMPTION (MWh)	YEAR 2024
38. a) Consumption of coal and coal products	0
38. b) Fuel consumption from crude oil and petroleum products	38,112
38. c) Natural gas fuel consumption	419,236
38. d) Consumption of fuels from other non-renewable sources	9,997
38. e) Consumption of electricity, heat, steam and cooling from fossil fuels, purchased or acquired	109,648
<b>37. a) Total energy consumption from fossil fuels</b>	<b>576,994</b>
RA 34 Share of fossil fuels in total energy consumption	75.02%
37. b) Consumption from nuclear sources	0
RA 34. Share of nuclear sources in total energy consumption	0%
37. c) i. Consumption of fuels from renewable sources, including biomass (also includes industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.)	140,742
37. c) ii. Consumption of electricity, heat, steam and cooling from renewable sources, purchased or acquired	69,307
37. c) iii. Consumption of self-produced renewable energy without resorting to fuels	6,832
<b>37. c) Total energy consumption from renewable sources</b>	<b>216,881</b>
RA 34. Share of renewable sources in total energy consumption	28.19%
<b>37. Total energy consumption</b>	<b>769,202*</b>

\* This figure is derived from the sum of total energy consumption from both fossil and renewable sources, from which the amount of energy sold, equal to 24,674 MWh, is subtracted.

ENERGY PRODUCTION (MWh)	YEAR 2024
39. Energy production from non-renewable sources	210,243
39. Energy production from renewable sources	147,574
Total energy production from non-renewable and renewable sources	<b>357,817</b>

ENERGY INTENSITY (MWh/€)	YEAR 2024
40. Total energy consumption of activities in sectors with high climate impact compared to net revenues from those activities	0,00024
41. Total energy consumption of activities in sectors with high climate impact	769,202
Net revenue (in balance sheet)	3,239,365,000

For the above-mentioned revenues, which are also reported in the Group's financial statements, please refer to the relevant section of the Annual Financial Report. The Group, which operates in the meat processing and preservation sector and the production of meat products (code 10.1), belongs to a sector classified by the CSRD as having a high climate impact.

<sup>1</sup> All information reported in the tables relating to indicator E1-5 is collected directly from bills and consumption records of individual sites, with accurate traceability of the different energy categories used. Each type of energy is accounted for separately, and, where necessary, DEFRA 2024 conversion factors have been applied to align the data with the unit of measurement required by the CSRD, i.e., MWh.

ESRS  
E1-6

### GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

Developing an effective and credible decarbonization strategy requires the adoption of robust and internationally recognised emissions measurement systems. In addition to the LCA (Life Cycle Assessment) methodology, one of the most widely used tools for monitoring environmental impact is the **Greenhouse Gas Protocol (GHG Protocol)**, developed in the late 1990s by the **World Resources Institute (WRI)** in response to evolving global climate change policies.

The GHG Protocol is an international reference standard for reporting greenhouse gas emissions, providing operational and methodological tools for their measurement and quantification.

In 2024, continuing with previous reporting periods, the **INALCA Group** collected the data needed to estimate its **carbon footprint**, applying the **IPCC (Intergovernmental Panel on Climate Change)** methodology. Emissions are expressed in **tons of CO<sub>2</sub> equivalent**, calculated using **Global Warming Potential (GWP)** coefficients over a 100-year time horizon.

Emissions are classified into three categories, according to the GHG Protocol structure:

- ▶ **Scope 1:** direct emissions generated by the Group's internal activities, such as the use of fuels for energy production, the use of company vehicles, production processes, and emissions from livestock farming on company-owned farms;
- ▶ **Scope 2:** indirect emissions resulting from the consumption of electricity purchased and consumed, but not generated within the company's operating scope;
- ▶ **Scope 3:** indirect emissions generated along the value chain, both upstream (upstream) and downstream (downstream), not directly controlled by the Group but connected to its activities.

Starting with the 2021 Sustainability Report, INALCA has expanded its monitoring to include Scope 3 emissions, in line with the **GHG Protocol – Corporate Value Chain (Scope 3)** Accounting and Reporting Standard, which provides for up to 15 categories of indirect emissions, from which the company has selected those most relevant to its value chain. For all three scopes, emissions have been further aggregated into four macro-operational areas: **livestock farms, slaughterhouses/processing centres, logistics platforms, and other**, the latter including, among others, the **energy production activities from fat rendering** (UNITEA S.p.A.).

The Scope 3 categories considered by INALCA are listed in the following table.

REFERENCE BOUNDARIES	CATEGORY	CATEGORY DESCRIPTION	CALCULATION METHOD	METHODOLOGICAL NOTE
UPSTREAM SCOPE 3 EMISSIONS	<b>Purchased goods and services (category 1)</b> <i>Materials</i>	Emissions related to the extraction, production, and transportation of goods and services purchased or acquired by the Group. Examples include slaughtered animals that do not come from Group-owned farms, packaging, and chemicals and sanitisers.	<b>Average-based</b>	Based on weight quantities and specific emission factors. Sources: LCA, EPD, Ecoinvent v3, AgriFootprint v5. Goods included: packaging, chemicals, detergents, non-company livestock head.
	<b>Fuel and energy related activities not included in Scope 1 and 2 (category 3)</b> <i>Fuels (net of combustion process)</i>	Emissions related to the extraction, production and transport of fuels and energy purchased or acquired by the Group, net of what has been considered in scope 1 and 2. This includes, for example, emissions downstream of the purchased energy and any losses related to its transport/distribution.	<b>Emission factor-based (upstream)</b>	Multiplication of consolidated energy and fuel consumption by upstream emission factors (Ecoinvent v3). Considering: extraction, refining, transport, and network losses.
	<b>Upstream transportation and distribution (category 4)</b> <i>Inbound transport (raw materials)</i>	Emissions from the transportation and distribution of products purchased in the reporting year, among the Group's Tier 1 suppliers and its operations on vehicles not owned or operated by the Group. This also includes emissions from inbound logistics (e.g., animals delivered to slaughterhouses) and outbound logistics, such as third-party transportation and distribution between Group facilities.	<b>Distance-based</b>	Weight and route data were used, broken down by mode (road, ship, train). No cost-based estimates were used. Factors from Ecoinvent v3.
DOWNSTREAM SCOPE 3 EMISSIONS	<b>Waste generated in operations (category 5)</b> <i>Waste + wastewater</i>	Emissions from third-party waste disposal and treatment generated in Group-owned or -controlled operations. This category includes emissions from the disposal of both generated waste and wastewater	<b>Waste-type specific</b>	Calculation by waste type, quantity, and final treatment. Factors from Ecoinvent v3, methodology consistent with IPCC AR5. For transport, conservative estimate of 50 km.
	<b>Downstream transportation and distribution (category 9)</b> <i>Outgoing transport (waste)</i>	Emissions related to the transportation and distribution of products sold outside their own gate in vehicles and facilities not owned or controlled by the Group. This category includes only outbound transportation carried out by the Group's logistics companies.	<b>Distance-based</b>	Based on logistics company data (quantity + distance). No use of the expense-based method. Factors from Ecoinvent v3.

\* Tier 1 suppliers are companies with which the INALCA Group has a purchase order for goods or services (e.g., materials, parts, components, etc.). This category includes only outbound transport performed by the Group's logistics companies, i.e., INALCA Food & Beverage and its subsidiaries.

GHG (Greenhouse Gas) emissions were calculated using SimaPro v9.3 software, primarily using the Ecoinvent v3 and Agri-Footprint v5 and v6 databases, supplemented by data from scientific literature and the EPDs (Environmental Product Declarations) of INALCA products. The climate characterisation method adopted for the entire study is the Global Warming Potential over a time horizon of 100 years (GWP100), according to the IPCC 2013 method, based on the IPCC's Fifth Assessment Report (AR5). This approach ensures alignment with the main international methodologies for emissions reporting.

Appropriate emission factors were used to convert primary and secondary data into greenhouse gas emissions. Whenever possible, reference was made to the DEFRA 2025 database (GHG Conversion Factors – full set), internationally recognised for its reliability and constant updating. In the absence of relevant DEFRA factors, the analysis was supplemented with values from the Ecoinvent v3 and Agri-Footprint v6 databases to ensure complete coverage of emission sources. For emissions from livestock, the historical factors derived from INALCA meat EPDs were abandoned and replaced with new, updated emission factors, developed following an in-depth internal study of the INALCA supply chain, to improve the accuracy and consistency of the assessments. To quantify Scope 3 GHG emissions, methodologies compliant with the GHG Protocol Corporate Value Chain (Scope 3) Standard were adopted, with the aim of ensuring completeness, transparency, and consistency of reporting.

The methodological approach is based on a combination of primary data (where available), secondary sources from LCA databases, scientific literature, and internationally recognised regulatory documents. The categories not reported in this Report were subject to an initial relevance analysis, after which they were deemed excluded because they were not applicable to the INALCA Group's operating context or, in some cases, due to the difficulty of ensuring consistent standardisation at the Group level. Nonetheless, the Group confirms its commitment to regularly reviewing the relevance of the Scope 3 categories, with the aim of progressively expanding the reported information scope, to the extent possible and consistent with its operations, in order to pursue an ever-increasing level of completeness. Finally, it should be noted that this information is currently provided on a voluntary basis, as there are currently no binding regulatory requirements for INALCA. Finally, the study assessed the degree of uncertainty associated with the different emission categories calculated for Scope 3. For Category 1, a medium level of uncertainty was found, primarily due to the variability of the emission factors available in the various databases. Category 4 also

presents a medium level of uncertainty, primarily due to the limited availability of specific data relating to transport routes and weights handled. Categories 3, 5, and 9, however, show a low level of uncertainty, thanks to the use of reliable primary data, consolidated calculation models, and standardised emission sources.

Biogenic emissions, primarily generated by bovine enteric fermentation and the management of livestock manure, have been included among Scope 1 direct emissions. Their quantification was carried out in accordance with the "IPCC 2019 Refinement to the 2006 Guidelines for National Greenhouse Gas Inventories," which represents the most up-to-date technical and scientific reference for agricultural emissions. The consumption of agricultural diesel, used on farms to power vehicles, also falls within Scope 1.

To ensure maximum transparency and completeness of reporting, the study also included out-of-scope emissions (excluded from total scope 1 emissions, in compliance with ESRS E1 – RA 43 c), i.e. those that do not fall within the conventional scopes of scope 1, scope 2, and scope 3. In particular, emissions from the biogas combustion process and fat casting were estimated, activities that, although not falling within the traditional scopes, still represent a direct source of fossil CO<sub>2</sub>. For biogas, an emission factor of 199.01 kg CO<sub>2</sub>eq per MWh was considered, while for fat skimming, the value used was 254.99 kg CO<sub>2</sub>eq per MWh, both taken from the complete set of DEFRA 2025 factors. The total emissions associated with these two sources for 2024 are 10,776 tons CO<sub>2</sub>eq for biogas and 8,585 tons CO<sub>2</sub>eq for fat skimming, respectively.

All results presented, both in the detailed data and in the aggregated reporting, transparently include both "inside-of-scope" emissions, relating to Scopes 1, 2, and 3, and "outside-of-scope" emissions, including emissions and sequestration of biogenic CO<sub>2</sub>, where relevant. Please note that the "Outside of Scope" portion is not included in the total calculation of Scope 1 emissions. This allows for a comprehensive and integrated view of the climate impact associated with the entire analysed supply chain.

These overall methodological assumptions ensure scientific soundness, reproducibility, and transparency of the results, contributing to credible reporting that complies with international environmental sustainability standards.



GHG EMISSIONS BY SCOPE 1 (tCO <sub>2</sub> eq)	YEAR 2024
48. a) Gross GHG emissions by scope 1	181,471
48. b) Percentage of Scope 1 GHG emissions covered by regulated emissions trading systems	14%
GHG EMISSIONS BY SCOPE 2 (tCO <sub>2</sub> eq)	
49. a) Scope 2 GHG gross emissions based on location (location-based)	44,180
49. b) Scope 2 GHG gross emissions based on market (market-based)	52,641
SIGNIFICANT GHG EMISSIONS BY SCOPE 3 (tCO <sub>2</sub> eq)	
51. TOTAL GROSS INDIRECT GHG EMISSIONS (SCOPE 3)	3,464,568
Purchased goods and services	3,384,083
Capital goods	N/A
Fuel and energy-related activities (not included in Scope 1 or 2)	50,409
Transportation and upstream distribution	17,596
Waste generated during operations	5,434
Business travel	N/A
Employee commuting	N/A
Upstream leasing activities	N/A
Downstream transportation	7,046
Processing of products sold	N/A
Use of products sold	N/A
End-of-life treatment of products sold	N/A
Downstream leasing activities	N/A
Franchising	N/A
Investments	N/A
TOTAL GHG EMISSIONS (tCO <sub>2</sub> eq)	
52. A) TOTAL GHG EMISSIONS (LOCATION-BASED)	3,690,219
52. B) TOTAL GHG EMISSIONS (MARKET-BASED)	3,698,680
GES INTENSITY TO NET REVENUES (tCO <sub>2</sub> eq/€)	ANNO 2024
53. TOTAL GHG EMISSIONS (LOCATION-BASED) TO NET REVENUES	0.001139
53. TOTAL GHG EMISSIONS (MARKET BASED) VERSUS NET REVENUES	0.001141
GES INTENSITY TO NET REVENUES (tCO <sub>2</sub> eq/€)	
RA 55. NET REVENUES	3,239,365,000

### ANTICIPATED FINANCIAL EFFECTS FROM MATERIAL PHYSICAL AND TRANSITION RISKS AND POTENTIAL CLIMATE-RELATED OPPORTUNITIES

Research initiatives aimed at improving the sustainability of the production chain are developed across all three ESG areas. In the environmental field, and in line with the results of the Double Relevance analysis, they focus primarily on combating climate change through the adoption of energy efficiency technologies, energy production from renewable sources - particularly solar and biomass - and the promotion of circular economy processes. These initiatives are complemented by additional research and innovation activities, partly supported by subsidised financing projects, focused on food safety, technological process and product innovation, animal welfare, and strengthening national beef supply chains. For more information on the risks and opportunities relevant to the INALCA Group, please refer to the ESRS 2 SBM-3 and IRO-1 sections.

The table below shows the investments made by the Group in the three-year period 2019-2024 and those planned for the subsequent period 2024-2026, broken down by sector of intervention.

#### INALCA GROUP SUSTAINABILITY INVESTMENTS IN ITALY AND ABROAD \*

TYPE OF INTERVENTION	AREA	PERIOD 2010/2023	PERIOD 2024	PERIOD 2025/2026	TOTAL
CONSTRUCTION / DEVELOPMENT OF BIOGAS PRODUCTION PLANTS - BIOMETHANE TRANSITION	ENERGY PRODUCTION FROM RENEWABLE SOURCES	21,571,279	2,740,034	19,981,030	44,292,343
CONSTRUCTION / EXPANSION OF PHOTOVOLTAIC PLANTS	ENERGY PRODUCTION FROM RENEWABLE SOURCES	2,455,070	876,679	9,155,221	12,486,970
CONSTRUCTION OF COGENERATION PLANTS	ENERGY EFFICIENCY	3,911,589	1,813,792	-	5,725,381
CONSTRUCTION / EXPANSION OF REFRIGERATION PLANT	ENERGY EFFICIENCY	-	433,636	-	433,636
CONSTRUCTION OF TRIGENERATION PLANTS	ENERGY EFFICIENCY	3,953,111	16,864	-	3,969,975
CONSTRUCTION OF BY-PRODUCT RECOVERY AND VALORISATION OF BY-PRODUCTS	CIRCULAR ECONOMY PROCESSES / BY-PRODUCT RECOVERY	17,679,634	1,988,275	-	19,667,909
STUDY ON THE USE OF ADDITIVES IN FARMING TO REDUCE ENTERIC METHANE EMISSIONS	CARBON FOOTPRINT REDUCTION	-	-	100,000	100,000
HYDROLYSIS PLANT CONSTRUCTION	CIRCULAR ECONOMY PROCESSES / BY-PRODUCT RECOVERY	14,281,167	1,134,560	-	15,415,727
<b>TOTAL INVESTMENTS FOR SUSTAINABILITY</b>		<b>63,851,850</b>	<b>9,003,840</b>	<b>29,236,251</b>	<b>102,091,941</b>

\* The investments described are aggregated for each legal entity of the Group, including the investee companies.

**INALCA GROUP INVESTMENTS IN RESEARCH AND INNOVATION**

SUPPORT FOR RESEARCH AND INNOVATION - FAVORABLE FINANCE INSTRUMENTS ADOPTED BY THE GROUP	SUBJECT	PERIOD 2019/2023	PERIOD 2024	PERIOD 2025/2026	TOTAL
<b>PNRR - 5TH "INALCA NORD" SUPPLY CHAIN TENDER</b>	Investments in animal welfare on livestock farms, precision farming, digitalisation, renewable energy, circular economy	-	50,000,000	-	50,000,000
<b>DEVELOPMENT CONTRACT</b>	Production efficiency in the cured meats sector	-	49,000,000	-	49,000,000
<b>IV° SUPPLY CHAIN TENDER</b>	Consolidation of the Italian beef supply chain in terms of animal welfare, drug management, and productivity	10,800,000	-	-	10,800,000
<b>PON - ONE HEALTH ON FOOD SAFETY</b>	Innovation of food products with reduced additive content	600,000	-	-	600,000
<b>TAX CREDIT</b>	Innovation of industrial production processes	934,936	-	-	934,936
<b>TOTAL INVESTMENTS FOR RESEARCH AND INNOVATION</b>		<b>12,334,936</b>	<b>99,000,000</b>	<b>-</b>	<b>111,334,936</b>



## ESRS E2 - Pollution

ESRS E2-1

### POLICIES RELATED TO POLLUTION

INALCA recognises the importance of managing the environmental impacts of air pollution in its operations, as well as water and soil pollution on livestock farms, caused by pollutant emissions generated by the activities of stakeholders along the entire value chain. To monitor these impacts, INALCA has adopted an **ISO 14001-compliant Environmental Management System** for years, demonstrating its concrete commitment to environmental protection and pollution prevention. This system provides the framework through which the company defines, implements, and monitors its environmental policies and objectives in a structured manner, with the aim of progressively reducing the impact of its business activities on the environment and ensuring continuous performance improvement. Even at sites and factories where ISO 14001 certification is not currently in place, INALCA is committed to applying the same management and operational principles established by the certified system, implementing internal environmental control, monitoring, and improvement tools. This approach allows the company to maintain a high standard of management consistency throughout the entire production chain, strengthening its commitment to sustainability and reducing environmental impacts.

In the livestock sector, the Group has implemented a specific **procedure of good hygiene, health, safety and environmental practices**, shared with the farmers participating in the supply chains most directly connected to the company and over which it exercises the greatest power of influence. This particularly concerns the **bullock, heifer, and white-meat veal** supply chains. These good practices aim to promote sustainable agricultural and livestock practices that prevent and reduce soil and water pollution, as well as incentivise the efficient and responsible use of natural resources.

Finally, the Group has an integrated policy that encompasses the areas of **Quality, Environment, Safety and Social Responsibility**, demonstrating its ongoing commitment to continuous improvement, environmental protection as well as worker health and safety.

ESRS E2-2

### ACTIONS AND RESOURCES RELATED TO POLLUTION

The actions undertaken to reduce pollution are defined and documented in the **Environmental Review**, prepared annually by the relevant corporate functions for certified facilities, in line with the requirements of the ISO 14001 environmental management system. This document is an essential tool for assessing the company's environmental performance, identifying areas for improvement, and planning concrete actions for environmental protection. Even at INALCA Group sites and companies not yet formally certified according to ISO 14001, the same environmental planning and monitoring process is adopted, following the same principles and criteria. In this way, the commitment to sustainability and reducing environmental impact remains constant and consistent across the entire company.

The INALCA Group does not currently have specific environmental management systems in place for its livestock farms. However, the Group intends to evaluate, in the coming years, the possibility of implementing a structured and adequately documented monitoring system for the environmental impacts on water and soil in livestock farms. This initiative is part of a continuous improvement in sustainability and environmental protection throughout the entire production chain.

ESRS TOPIC	AREA OF INTERVENTION	SPECIFIC ACTION
ESRS E2 POLLUTION	Periodic performance reporting	Periodic reporting as part of the Environmental Review (prepared annually, in line with ISO 14001). Reporting process also adopted at INALCA Group sites and companies not yet formally certified.
	Farm monitoring system	Evaluate, in the coming years, the implementation of a structured and documented monitoring system for environmental impacts on water and soil in livestock farms.

### TARGETS RELATED TO POLLUTION

INALCA defines annual pollution reduction targets in accordance with and within the context of the ISO 14001 environmental management system, which is a fundamental tool for monitoring, evaluating, and continuously improving its environmental performance. Each target is set taking into account both the current regulatory framework and the environmental needs of the local area in which the company operates, with the active involvement of various departments and a constant commitment to adhering to the principles of sustainability and continuous improvement.

Although not all INALCA Group sites are currently certified according to ISO 14001, the same environmental principles and criteria established by the system are adopted and applied in these cases as well. Specifically, at sites not certified to ISO 14001, the company monitors and takes into account the pollution reduction targets established by current legislation regarding air pollution at its production sites, with which it is required to comply. This ensures consistent and homogeneous behaviour throughout the entire region, guaranteeing compliance with environmental regulations and a commitment to sustainability.

At present, the INALCA Group does not have specific corporate objectives at Group level regarding air, water and soil pollution; however, a future evaluation is planned of the possibility of establishing such objectives to further improve overall environmental performance.

ESRS E2-3

ESRS E2-4

### POLLUTION OF AIR, WATER AND SOIL

#### TOTAL VOLUME OF AIR, WATER AND SOIL POLLUTANTS (pursuant to annex II, ec Regulation CE n.166/2006)

	VALUE (KG/YEAR)
<b>28. A) EMISSIONS OF POLLUTANTS INTO THE AIR</b>	
Nitrogen oxides (NOx/NO2)	164,201.66
Ammonia (NH3)	163,550.47
Carbon monoxide (CO)	147,888.30
Volatile organic compounds (VOC)	5,562.65
Particulate matter (PM10)	4,626.00
Sulphur oxides (SOx/SO2)	818.24
<b>28. A) EMISSIONS OF POLLUTANTS INTO WATER</b>	
Chlorides (Cl)	440,501.59
Total Nitrogen	23,812.59
Total Phosphorus	9,230.03

Please note that the quantities shown in the table refer to emissions reported through annual analyses of the main production sites, as well as the agricultural holdings of companies where the analysis was conducted. Furthermore, it should be noted that the reported emissions of pollutants into water refer only to the production activities of the INALCA Group. Pollutant emissions into soil are not currently available.

## ESRS E3 - Water and marine resources

ESRS E3-1

### POLICIES RELATED TO WATER AND MARINE RESOURCES

Efficient and responsible management of water resources is a central element of INALCA's environmental strategy. The company adopts a structured approach to govern all phases of the water cycle - from supply to disposal - to minimise environmental impacts and ensure the sustainable use of this fundamental resource. These activities are managed through an Environmental Management System compliant with UNI EN ISO 14001, which defines operating procedures, periodic monitoring, and continuous improvement objectives, ensuring compliance with current regulations and the progressive reduction of environmental impacts related to water use.

Even at the Group's plants and sites not yet certified to ISO 14001, INALCA applies the same management and operational principles established by the certified system, through internal monitoring, control, and improvement tools. This approach allows for the maintenance of high standards of consistency and responsibility in environmental management throughout the country, strengthening the company's commitment to sustainability and the protection of natural resources.

ESRS E3-2

### ACTIONS AND RESOURCES RELATED TO WATER AND MARINE RESOURCES

For its production sites, INALCA sources primarily from groundwater, a source that ensures high quality standards and consistent availability. The company manages over **90% of its water supply internally**, directly and comprehensively overseeing all phases of the water cycle: from collection to distribution in production processes, from use to wastewater treatment and purification. This comprehensive internal management allows INALCA to optimise the use of water resources, promoting efficient and responsible use. Continuous monitoring of the company's water network allows for the timely identification of any leaks or anomalies, contributing to the prevention of waste and the reduction of consumption. These activities are part of a broader environmental sustainability strategy aimed at protecting natural resources and improving environmental performance. Furthermore, the chemical and physical characteristics of wastewater generated by company processes are particularly favourable for treatment and purification operations, thanks to a balanced ratio between Chemical Oxygen Demand (COD) and Biological Oxygen Demand (BOD). This balance facilitates the efficiency of purification processes, reducing the environmental impact of wastewater and contributing to compliance with regulatory parameters regarding water discharges.

ESRS THEMATIC	AREA OF INTERVENTION	SPECIFIC ACTION
ESRS E3 WATERS AND MARINE RESOURCES	Water resource management and monitoring	Direct and integrated management of over 90% of the water cycle at INALCA production sites, including groundwater supply, use, treatment, and purification of wastewater.
		Constant monitoring of the company's water network to identify leaks and optimise water efficiency.

### TARGETS RELATED TO WATER AND MARINE RESOURCES

ESRS E3-3

INALCA recognises the strategic value of water resources and their growing importance in a global context marked by scarcity, pressure on ecosystems and increasing demand. From this perspective, sustainable water management is a fundamental pillar of the company's environmental strategy. At all its production sites, the company pursues improvement objectives aimed at both reducing water consumption and increasing the proportion of recovered and reused water, in compliance with current regulations. Currently, the use of recovered water is regulated by Ministerial Decree N°185/2003, which limits its use in areas that could involve contact with food, representing an operational constraint for certain processes in the food sector.

INALCA adopts an Environmental Management System compliant with the ISO 14001 standard, through which it defines and monitors specific annual objectives related to water efficiency. This system enables a structured approach to resource management, adapting actions to local environmental conditions and the national and European regulatory framework. Even at sites not yet formally certified, the company applies management principles consistent with those required by the ISO 14001 system, ensuring consistent management across the entire operational scope.

Currently, the Group does not have formalised global corporate objectives regarding water resource management. However, an evaluation is underway to introduce structured targets, including increasing the percentage of recovered water relative to total water used, with the aim of formalising them in the medium term. This area is already a consolidated focus for the Group. The significant increase in the volume of recovered water, amounting to **183,872 m<sup>3</sup> in 2024 compared to the 87,918 m<sup>3</sup> reported in 2023**, clearly demonstrates this commitment. This result is the result of more rigorous and comprehensive reporting of the quantities actually recovered, extended to all INALCA Group operations, as well as the ongoing efficiency improvement of the purification plants located at the various production sites and farms. This process is part of a broader corporate strategy aimed at continuously improving environmental performance and reducing the impact on water ecosystems.

At the supply chain level, the water footprint is addressed in line with the international standards promoted by the Water Footprint Network. This indicator considers three components:

- ▶ **Green water:** rainwater evapotranspiration from soil and crops;
- ▶ **Blue water:** water withdrawn from surface or underground sources and not returned to the basin of origin;
- ▶ **Grey water:** theoretical volume of water required to dilute the pollutants generated during the production process.

The global average water footprint for producing 1 kg of beef is estimated at 15,415 litres, of which 94% is green, 3% blue, and 3% grey. However, these values vary significantly depending on the farming system and local climate conditions. In Italy, the average water footprint per kg of beef is around **11,500 litres**, with a composition of **87% green water, 8% blue, and 5% grey**. Excluding the green component (which has minimal environmental impact), the actual water consumption is reduced to approximately 1,495 litres per kg, and can reach 790 litres in the most efficient systems.<sup>2</sup>

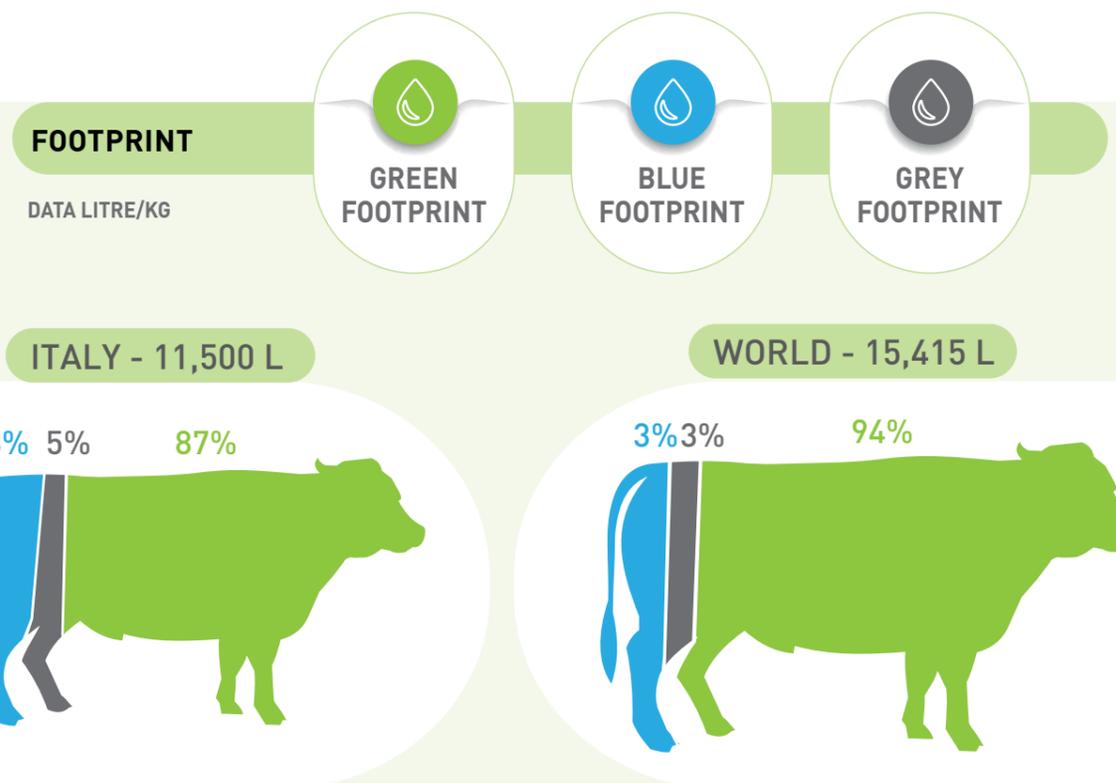
These data highlight the importance of assessing water impact not only in quantitative terms, but also in qualitative and contextual terms, distinguishing between water types and production methods. INALCA intends to continue to strengthen its policies in this area, promoting increasingly efficient use of water resources across the entire value chain.

### WATER CONSUMPTION

For the INALCA Group, **water consumption** corresponds to the amount of water withdrawn within the confines of a production facility and not discharged to the environment or to third parties during the reporting period. Consumption therefore includes not only the water contained in finished products, such as beverages (where present), but also that incorporated into by-products, such as vinasse, yeasts, or other residues from agro-industrial processes, such as sewage sludge. **Water withdrawal** represents the total volume of water supplied from public sources or company-owned wells and used in all the Group's production activities. Water discharge, on the other hand, refers to the amount of water returned to the environment, generally after appropriate treatment in internal purification plants. **Water reuse and recycling** refer to the use of water already used within production processes, reusing it—after appropriate purification—in the same cycles or in other industrial processes. This practice helps reduce the demand for fresh water, contributing to the water efficiency and environmental sustainability of the INALCA Group's activities.

WATER CONSUMPTION (m <sup>3</sup> )	YEAR 2024
28. a) Total water consumption	764,020
28. b) Total water consumption in water-stressed areas, including those with high water stress*	50,064
28. c) Total volume of recycled and reused water	183,872
RA 32. Optional - Water withdrawals	4,324,330
RA 32. Optional - Water discharges	3,560,309

\*To identify water-stressed areas where its facilities are located, the INALCA Group conducts, in each reporting period or for newly established facilities, a comprehensive water risk assessment for all operations, known as the Global Water Risk Screening. To this end, the Group uses a water risk mapping tool developed by the WRI, called Aqueduct, to identify sites located in high-water-risk areas, including those with high and very high-water stress, as defined by the ESRS.



Source: Mekonnen, M.M., Hoekstra, A.Y. The Green, Blue and Grey Water Footprint of Farm Animals and Animal Products. Val of Water Research Report Series no.48, UNESCO-IHE, Delft, the Netherlands, 2010

<sup>2</sup> Atzori A.S., Canalis C., Dias Francesconi A.H., Pulina G., 2016. A preliminary study on a new approach to estimate water resources allocation: the net water footprint applied to animal products. Agric. and Agricult. Sci. Procedia, 8, pp. 50-57



## ESRS E4 - Biodiversity and ecosystems

ESRS E4-1

### TRANSITION PLAN AND CONSIDERATION OF BIODIVERSITY AND ECOSYSTEMS IN STRATEGY AND BUSINESS MODEL

INALCA, although it does not currently have a transition plan specifically dedicated to biodiversity, has already initiated activities since 2022 aimed at increasing awareness and managing the potential environmental impacts related to its operations. Specifically, an analysis was conducted of the positioning of all the Group's sites with respect to protected natural areas or areas of high biodiversity value. This assessment aims to prevent and mitigate any direct or indirect effects of company activities on biodiversity, promoting responsible land management. The analysis highlighted that three production sites are located outside and not directly adjacent to these sensitive areas (considering a proximity area of 10 km): the INALCA S.p.A. headquarters in Ospedaletto Lodigiano (LO), located approximately 7 km from the SIC-ZPS IT2090001 - Monticchie Regional Reserve site; the ITALIA ALIMENTARI S.p.A. headquarters in Ospedaletto Lodigiano (LO), located approximately 7 km from the SIC-ZPS IT2090001 - Monticchie Regional Reserve site; in Postalesio (SO), located approximately 6 km from the Postalesio Piramidi Nature Reserve; and the CORTICELLA farm, located in Galvana (MO), approximately 10 km from the SIC-ZPS IT4050016 - Monteveglio Abbey Regional Park site. This list is updated annually to ensure constant monitoring and timely management of environmental risks. The INALCA Group is aware of the direct links with impacts and risks related to biodiversity, given the nature of its business. The main challenges arise along the upstream value chain, where the Group operates in the agricultural sector, which is directly linked to environmental issues and ecosystem risks. Various initiatives have been undertaken over the years to mitigate these risks, further detailed in this chapter, although not formally structured in a transition plan.

ESRS E4-SBM-3

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

INALCA recognises that its activities, particularly those related to livestock farming and the agri-food supply chain, can have a significant impact on biodiversity and natural ecosystems. Although a specific biodiversity transition plan has not yet been formalised, the Group is actively committed to preventing environmental risks, with particular attention to protecting local ecosystems.

The analysis conducted according to the principle of dual materiality has shown that, to date, no significant impacts, risks, or opportunities directly attributable to the Group's operational activities have emerged. This is because INALCA's production plants are not located within or in the immediate vicinity of protected areas, habitats of threatened species, or areas of high biodiversity value. However, the most significant impacts are concentrated along the value chain, particularly in the upstream phases, where the agricultural and livestock activities that provide the main raw materials used are located. These activities, if not managed sustainably, can exert significant pressure on natural and agricultural ecosystems, with direct impacts on biodiversity and the resilience of the entire supply chain. Among the identified risks, the potential accidental introduction of invasive exotic species or infectious agents such as viruses, which can cause epidemics in livestock farms, is particularly significant. Such an event could compromise the availability of finished products, with significant economic impacts for the Group. Another critical factor is the degradation of agricultural and rural ecosystems, often caused by unsustainable production practices. In the long term, this phenomenon can result in a loss of soil fertility, resulting in a reduction in the availability and quality of feed needed for livestock farming, thus jeopardising the operational stability of livestock farming operations. Finally, direct pressure on biodiversity and soil health has been detected from intensive agricultural and livestock farming practices, especially when combined with excessive use of pesticides and fertilisers.

These negative impacts are significant in both the short and long term.

In light of these considerations, it is essential to promote responsible sourcing, based on sustainability criteria, and strengthen dialogue with agricultural and livestock suppliers. The goal is to incentivise production practices that preserve biodiversity, protect soil quality, and ensure the continuity and resilience of the value chain.

Although specific mitigation measures for these risks have not yet been defined, the Group will evaluate the integration of concrete objectives and actions into its environmental strategy, in line with European regulations, such as the CSRD and ESRS standards. These assessments represent an important step towards a more structured and responsible management of environmental impacts related to biodiversity.

### POLICIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

ESRS E4-2

INALCA adopts an integrated approach to environmental sustainability, promoting the responsible management of natural resources throughout its supply chain. Although there is currently no formal corporate policy specifically dedicated to protecting biodiversity, the Group applies principles and practices aimed at preventing environmental impacts. However, the Group has a policy dedicated to preventing deforestation along its supply chain, called the **"INALCA Group Deforestation Commitment"**.

### ACTIONS AND RESOURCES RELATED TO BIODIVERSITY AND ECOSYSTEMS

ESRS E4-3

Aware of the importance of protecting biodiversity and ecosystems, the INALCA Group has undertaken concrete actions to integrate environmental sustainability principles into its operations and supplier relationships, in line with its stated objectives.

In this context, and in preparation for emerging regulations regarding biodiversity preservation and soil protection, the INALCA Group intends to further strengthen its commitment by preparing for the entry into force of **Regulation (EU) 2023/1115 on deforestation (EUDR)**, scheduled for December 30<sup>th</sup>, 2025. To this end, the Group will carry out a detailed mapping of the products purchased and sold along its supply chain, collecting the relevant customs codes to identify any areas where the regulation applies. INALCA will also adopt a dedicated digital platform that will allow it to manage relevant product data, collect due diligence declarations (DDS) compliant with European standards, and integrate this information into internal traceability systems. The system will generate the necessary codes (Reference Number and Verification Number) via the European TRACES NT platform and transmit this information electronically to customers, ensuring full transparency along the entire value chain. With these activities, INALCA is preparing to implement European legislation in a structured and compliant manner, making a concrete contribution to preventing deforestation and promoting more sustainable procurement practices.

Also, with a view to protecting biodiversity and combating the abandonment of rural areas in Southern Italy, INALCA, in collaboration with Coldiretti, has launched a project to **revitalise livestock farming in Calabria, Sicily, and Sardinia**. The initiative, which can also be replicated abroad (particularly in Russia and Africa), aims to repopulate bovine herds in areas traditionally suited to livestock farming, but which have been progressively abandoned, resulting in a decline in productivity. The adopted livestock model involves a rearing cycle divided into two phases: an initial pasture-raised period, up to 10-12 months of age, and a subsequent period in protected facilities with a high-nutrient diet. To support this approach, the "cow-calf" line is promoted in rural areas of Southern Italy, including the islands. Calves are born and bred on the same farm. This allows farmers to select and gradually adapt their herd to the local context, improving production quality and ensuring greater profitability. The development of the cow-calf line is a key element in enhancing the agricultural enterprise, promoting breed biodiversity, respect for the environment, a better

integration between peoples, animals and the local area. Beef thus becomes not just a food, but a cultural expression of the local area. The project is based on an integrated supply chain model that promotes technology transfer and the adoption of sustainable practices, including through INALCA's participation in research institutions and platforms dedicated to agri-industrial sustainability. Furthermore, it is crucial to develop production and distribution infrastructures that improve market access for small-scale farmers, integrating primary production and processing to access higher value-added market segments.

In its production facilities, as part of its commitment to increasingly sustainable resource management, the INALCA Group has progressively begun using packaging materials certified according to **FSC® (Forest Stewardship Council®)** standards. This choice reflects the desire to ensure that cellulose-based raw materials come from responsibly managed forests, in compliance with rigorous environmental, social, and economic criteria. The adoption of FSC-certified packaging contributes not only to the protection of biodiversity and the conservation of forest ecosystems, but also to traceability and transparency along the packaging supply chain. The Group intends to continue extending this certification to an ever-increasing number of products, in line with its environmental objectives and stakeholders' expectations regarding the circular economy and responsible management of natural resources.

ESRS TOPIC	AREA OF INTERVENTION	SPECIFIC ACTION
ESRS E4 BIODIVERSITY AND ECOSYSTEMS	Regulation 1115/2023 (EUDR)	Implementation of a due diligence system for the prevention of deforestation, including product mapping and the adoption of a digital platform for managing Due Diligence Declarations (DDS).
	"Cow-calf" line project	A project with Coldiretti for livestock repopulation in Southern Italy, including the islands, based on the "cow-calf" model and mixed farming (pasture/protected structure), aimed at enhancing local agriculture and promoting the biodiversity of bovine breeds.
	Packaging from certified FSC supply chains	Progressive use of FSC® certified packaging materials to guarantee the origin of responsibly managed forests, protecting biodiversity and forest ecosystems.

ESRS E4-4

#### TARGETS RELATED TO BIODIVERSITY AND ECOSYSTEMS

While INALCA does not currently have formalised objectives specifically dedicated to biodiversity protection, it demonstrates a concrete commitment to this issue. This translates into the adoption of actions and activities aimed at preserving the environment surrounding its operations, the soil, and its health, particularly on its own farms. Therefore, the company is committed to continuously monitoring and improving its environmental performance, thus contributing, albeit indirectly, to the protection of ecosystems.

In the coming years, the company will evaluate the possibility of implementing biodiversity protection and monitoring systems, focusing particularly on the upstream stages of the supply chain. Furthermore, INALCA will continue to monitor the location of its factories in relation to areas at risk of biodiversity, as well as expanding its commitment to protecting native breeds, especially in Southern Italy, replicating the positive experience already underway in countries such as Russia and Poland.

## ESRS E5 - Use of resources and circular economy

ESRS E5-1

### POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

The efficient use of resources and the circular economy are of strategic importance to INALCA, which considers these aspects key elements in its path towards sustainability. The company recognises the value of the **circular economy** as a lever for optimising resource use, **reducing waste**, and **promoting more efficient and responsible production models**. With this in mind, the Group is strongly committed to the progressive integration of circular principles into its operations and supply chains. This commitment is formalised in the **"INALCA Code of Conduct for Sustainable Corporate Development,"** which defines the guiding principles for environmental, social and governance matters, with a vision focused on long-term sustainability. This document represents one of the central tools through which the company expresses its environmental strategy, including in relation to resource management.

**The Code of Conduct places particular emphasis on the efficient management of natural resources, waste prevention, reduction of the use of raw materials, and promotion, where possible, of the recycling and reuse of scraps and waste.** INALCA actively pursues innovative solutions aimed at reducing the environmental impact of its operations, adopting production models inspired by circularity, process optimisation, and the reduction of energy and material consumption. The policy, available on the company website, applies to all the Group's production companies, employees, collaborators, and third parties operating under the organisation's control. It was developed taking into account the operational context and discussions with key stakeholders. Its implementation is overseen by Top Management, as well as by the governing management, administrative and control bodies, and is supported by corporate management systems and internal communication mechanisms. INALCA also adopts a proactive approach to identifying risks and opportunities related to environmental sustainability, in compliance with legal and voluntary requirements.

**To support these objectives, INALCA has implemented an Environmental Management System compliant with ISO 14001** for years, which provides a structured framework for defining, implementing, and monitoring environmental policies. This system allows for the continuous assessment and improvement of the company's environmental performance, with a particular focus on reducing consumption, reusing by-products, and minimising environmental impacts. Even in plants not yet certified to ISO 14001, INALCA applies the same management principles through internal control, monitoring, and continuous improvement tools, ensuring operational consistency throughout the entire production chain. This systemic approach strengthens INALCA's commitment to an increasingly circular and sustainable production model, capable of combining innovation, competitiveness, and environmental responsibility.



**Packaging and ancillary materials: reduction and recycling**

INALCA uses various types of packaging: the main ones are plastic, paper and cardboard for fresh and frozen meat, while tinfoil and aluminium are used for canned meat. The goal is to use the least amount of plastic per type of packaging, privileging recyclable single-material packaging where technology allows, as well as encourage the replacement of disposable secondary packaging with reusable packaging.

Throughout 2024, in line with previous reporting periods, INALCA has resolutely continued its commitment to reducing the environmental impact of packaging through targeted interventions to optimise the materials used, reduce thickness, and increase recycled content, with particular attention to plastic and paper packaging. A progressive replacement of various packaging solutions has begun at all INALCA production plants, achieving tangible results in terms of raw material savings. Specifically, the adoption of thinner plastic materials has resulted in a total saving of over **42 tons of virgin plastic** in 2024 alone. At some plants, new materials have been introduced for packaging components, further reducing packaging weight while maintaining high product protection standards. At the Castelvetro plant, plastic films containing up to **50% recycled material** have also been adopted, with a significantly reduced environmental impact compared to previous solutions. At the same time, the introduction of highly recyclable single-material packaging is planned for 2025, in line with the latest circular economy regulations, benefiting the entire packaging life cycle.

Significant results have also been achieved in the paper sector. At the Rieti plant, a new supplier has been introduced for the production of canned meat packaging, enabling the recycled paper content to be increased to **100%**, thus avoiding the consumption of approximately **25 tons of virgin paper** each year.

Furthermore, in 2025, the introduction of thinner solutions is planned for some types of aluminium packaging, with an estimated saving of over **6 tons of material**. This initiative, currently being prepared at the Rieti plant, represents a further step forward in reducing the environmental impact of metal packaging.

In the cured meats and snacks sector, Italia Alimentari has long pursued a strategy aimed at packaging sustainability, developed in close collaboration with suppliers and throughout the entire production chain. Among the first initiatives adopted was the replacement of the paper cores of the reels with reusable plastic cores, which can be returned to suppliers for reuse. Another significant step involved the transition from traditional plastic trays to barrier-type paper trays, certified for sustainability and capable of guaranteeing the same shelf-life performance but with a reduced environmental impact. Furthermore, for some foreign markets, a recyclable single-material packaging solution has been introduced to replace the previous non-recyclable multi-layer material. In 2024, Italia Alimentari confirmed its commitment to more sustainable packaging, continuing the initiatives already underway and introducing further optimisations, such as reducing the thickness of packaging materials, to further reduce the environmental impact.

Currently, the INALCA Group does not have standardised, organisation-wide KPIs for packaging, but will evaluate the possibility of developing them in the future, with a view to continuous improvement and greater traceability of environmental performance.

Overall, the INALCA Group continues to consistently improve its packaging, adopting an approach geared towards environmental sustainability and production efficiency. Currently:

- ▶ The plastic packaging used contains an average of **39% post-consumer recycled material<sup>3</sup>**;
- ▶ The percentage of recycled paper in paper packaging is expected to reach **83% in 2024**.

All these initiatives contribute to significantly reducing the use of virgin materials, encouraging the reuse and recycling of resources, and strengthen the Group's commitment to a circular economy model increasingly integrated into production processes.

ESRS TOPIC	AREA OF SPECIFIC	ACTION INTERVENTION
ESRS E5 USE OF RESOURCES AND THE CIRCULAR ECONOMY	Valorisation of industrial and agricultural by-products.	Investments in technologies for the reuse and valorisation of by-products from slaughterhouse and processing processes, intended for the food, agricultural, animal feed, pharmaceutical, and cosmetics sectors.
	Packaging optimization	Packaging optimisation: Adoption of recyclable materials in key production facilities, resulting in significant savings in virgin raw materials. Replacement of non-recyclable solutions with certified packaging for foreign markets. Introduction of circular economy practices also in secondary packaging, with the use of reusable materials to reduce resource consumption.

<sup>3</sup> The decrease in the share of recycled plastic compared to the previous reporting period is attributable to several factors, including, in particular, the temporary reduction in the availability of plastic packaging containing recycled material in the reporting year, as well as current regulatory restrictions in the food sector that limit the use of recycled plastic in primary packaging in direct contact with food. The Group, in full compliance with current technological and regulatory constraints, will continue to constantly strive to improve its environmental performance in the packaging sector.

ESRS E5-3

**TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY**

The efficient use of resources and the circular economy are of fundamental strategic importance for INALCA, which considers these aspects key elements in its path towards sustainability.

ESRS TOPIC	AREA OF INTERVENTION	SPECIFIC ACTION	BASELINE	BASE VALUE	STATE OF PROGRESS
ESRS E5 USE OF RESOURCES AND CIRCULAR ECONOMY	<b>Valorise the by-products of meat processing through a dedicated fat skimming and bone processing plant</b>	The two processing lines (fat and bone) at the INALCA Castelvetro plant are now fully operational.	2022	0%	Plant fully operational 
	<b>Development of fertilisers from digestate (NP Sustainable Fertiliser Project)</b>	Production of 3 fertiliser prototypes (2 organic, 1 organo-mineral) and agronomic tests completed	2021	0	Successful intervention. Evaluation of similar projects underway. 
	<b>Packaging optimisation: reduction in weight, thickness and increase in recycled content, with consequent savings in raw materials used in processes</b>	Continuous improvement in all plants of packaging design with a view to reducing the use of virgin plastic	N.A. Initiative continuously improving	-	Initiative in continuous improvement.  The company will evaluate the possibility of developing comprehensive and standardised Group KPIs in the coming years.
	<b>Use of slaughterhouse by-products and agricultural waste to produce energy and raw materials with functional valorisation</b>	Construction of biogas plants at the Group's main strategic sites	2009	0	2 industrial biogas plants 5 agricultural biogas plants

For the INALCA Group, the circularity objective is to pursue a path of continuous improvement, aimed at strengthening and optimising all aspects already integrated into production processes, in line with the principles of the circular economy. The company is committed to further enhancing the efficient use of resources, minimising waste, and maximising the recovery and reuse of materials, with the aim of achieving increasingly higher levels of circularity throughout the entire production chain. For more information on the activities implemented, please see the section "ESRS E5-2 Actions and resources related to the use of resources and the circular economy."

These voluntary initiatives demonstrate a concrete commitment to building a more responsible economic model oriented towards future sustainability.

For more information on the objectives set, please see the section on **MDR-T** on page 164.

ESRS E5-4

**RESOURCE INFLOWS**

INALCA manages a variety of incoming flows, including both food resources intended for processing and distribution, as well as auxiliary materials for packaging and supporting logistics and production activities. Raw food materials include animals intended for slaughter and subsequent processing in compliance with current regulations, as well as various types of meat (including beef, pork, poultry, and others, to a lesser extent), as well as ingredients used in the preparation of processed food products. Completing the package are numerous non-food resources, including packaging materials, sanitising detergents, protective devices, and technical equipment necessary for the entire production chain. In terms of packaging, the most commonly used materials are plastic, paper and cardboard, primarily used for fresh, frozen, and/or deep-frozen meat, while tinplate and aluminium are used for canned meat. Polystyrene is used in product preservation along the cold chain, although initiatives are underway to gradually replace it with more sustainable solutions, subject to technological and regulatory limitations in the food sector. Plastic is also present in the form of stretch films, polyethylene bags and other protective materials used in various stages of the production process. With a view to promoting a circular economy and reducing environmental impact, INALCA is committed to progressively limiting the use of plastic, favouring - where technically possible - the adoption of more easily recyclable single-component materials and promoting the use of reusable packaging to replace disposable secondary packaging.

The data collection methodology for incoming products is based on information extracted directly from company management systems, considering all movements actually recorded. No estimates were used in any part of the data collection relating to primary inputs, as the information was provided directly by the individual data owners for all the Group's locations.

As part of a **continuous process of methodological improvement and refinement**, INALCA is constantly improving its methods for collecting, processing, and calculating data on meat purchased from external suppliers. Therefore, starting with the 2024 reporting period, it was deemed essential **to break down purchased meat by animal species**, with the aim of obtaining a more accurate and representative estimate of emissions associated with the different types of meat purchased by Group companies. This ongoing effort aims to improve the quality and granularity of data potentially used in calculating indirect emissions. In previous reporting periods, purchased meat data were aggregated according to a historically adopted classification (bone-in meat, boneless, frozen), without further distinction by type. The new approach, introduced with the 2024 data collection, allows for a **higher level of detail**, useful for a greater understanding of the raw materials involved in the Group's incoming resource flows.

Following this methodological refinement, **the data relating to the 2023 financial year of purchased meat were recalculated**, applying the same methodology used for 2024, in order to ensure **greater inter-annual consistency and comparability** of the reported information. During this review, it emerged that the original 2023 figure was **partially overestimated** due to **double accounting** of meat purchased by INALCA and subsequently used by other Group companies. The analysis conducted in 2024 identified and corrected these critical issues, ensuring a **more accurate and consistent representation of intercompany supply flows**.

Following this review, it is reported that, in the 2023 financial year, the total volume of meat purchased from external suppliers by the Group amounted to 170,404 tons, of which 69,208 tons were beef, 87,289 tons were pork, and 13,906 tons were poultry. These data are consistent in order to ensure correct comparability with the information referring to the 2024 financial year. In this regard, they are also reported in the ESRS 2 BP-1 section "General criteria for the preparation of the sustainability statement".

With regard to packaging, the reported data has been conservatively assumed to have zero recycled material content for all the Group's subsidiaries, since this information was only available for the Parent Company. It is important to highlight that all cardboard packaging purchased by the FSC-certified Group reported was calculated exclusively on the basis of data provided by the individual internal data owners and is not subject to estimates.

1. FOOD MATERIALS (ORGANIC - RENEWABLE)		TOTAL WEIGHT (tons)			
SLAUGHTERED ANIMALS			232,411		
PURCHASED MEATS			197,478		
	<i>of which beef and buffalo</i>		81,189		
	<i>of which pork</i>		89,795		
	<i>of which poultry</i>		25,877		
	<i>of which sheep and goat</i>		456		
	<i>of which horse and game</i>		161		
FEED USED			216,084		
2. NON-FOOD MATERIALS (TECHNICAL - NON-RENEWABLE)		TOTAL WEIGHT (tons)			
INGREDIENTS			9,049		
MISCELLANEOUS CHEMICALS (DETERGENTS, WATER TREATMENT CHEMICALS, OILS AND LUBRICANTS)			4,448		
3. PACKAGING (TECHNICAL - NON-RENEWABLE)		TOTAL WEIGHT (tons)		Of which components, products and secondary intermediate materials reused or recycled (including packaging)	
	TOTAL WEIGHT (tons)	Of which from a certified sustainable supply chain (FSC)		TOTAL WEIGHT (tons)	(%) OUT OF TOTAL
		TOTAL WEIGHT (tons)	(%) OUT OF TOTAL		
PAPER/CARDBOARD	12,869	4,482	34.83	10,663	82.86
WOOD	3,649	-	0.00	696	19.09
PLASTIC BOXES	133	-	0.00	2	1.50
PLASTIC	6,828	-	0.00	2,673	39.15
STEEL	2,141	-	0.00	1,452	67.81
ALUMINUM	798	-	0.00	360	45.13
<b>TOTAL</b>	<b>26,418</b>	<b>4,482</b>	<b>16.97</b>	<b>15,846</b>	<b>59.98</b>

ESRS E5-5

### RESOURCE OUTFLOWS

The INALCA Group's activities, which span the sectors of slaughtering and meat processing, livestock farming, distribution, and logistics, generate various types of waste. A significant portion consists of **packaging** made of paper, cardboard, plastic, polystyrene, mixed materials and wood, primarily used for the delivery of goods by suppliers. The management of these materials is a priority for the Group, which is committed to limiting environmental impact by optimising disposal processes, adopting low-impact materials, and promoting solutions that facilitate recovery and sustainable disposal. Another significant source of waste is the digestate produced following the anaerobic digestion process, currently classified with CER code 190604 and considered waste pursuant to Legislative Decree 152/2006. Despite this classification, **digestate** represents a resource with high potential, as it can be directly reused in agriculture as fertiliser and employed in the production of compost or in other agro-industrial applications. In this perspective, a **strategic collaboration between INALCA and Herambiente (Hera Group)** began in 2021, culminating in the establishment of the NewCo "BIORG" in 2022. The partnership aims to produce biomethane - a fully renewable fuel - and compost from the separate collection of municipal organic waste (OFMSW) and agri-food waste. The project was made possible thanks to a significant investment at the Herambiente site in Spilamberto (MO), where best available technologies (BAT) were integrated with the already operational composting plant, previously ow-

ned by a company controlled by INALCA. By-products are also the subject of a careful valorisation strategy, as demonstrated by the fat and bone treatment plant located in Castelvetro (see section E5-2).

In the area of waste management, starting in 2022, a structured waste management system has been implemented at the Group's main sites. This enables comprehensive waste management - from collection to final treatment - through the use of a digital platform that ensures traceability and monitoring of all process phases, up to actual recovery. The reported data refers to waste delivered by Group companies to authorised operators for disposal activities. Regarding waste intended for recovery, the information is derived from waste identification forms (FIR), completed upon delivery to the designated operators. The receiving facilities then further sort the materials, sorting them based on type and characteristics. Most recoverable waste is classified with the R13 code, corresponding to storage: this waste is temporarily stored awaiting subsequent recovery (e.g., recycling, composting, or energy recovery), in accordance with current legislation.

Compared to the previous reporting period, total waste, specifically waste diverted from disposal (in reality it was sent for recovery), has significantly decreased, by virtue of the recognition of the sewage sludge produced by the wastewater treatment plant of the INALCA Ospedaletto Lodigiano plant as by-products pursuant to Legislative Decree 152/2006 and subsequent amendments and additions, therefore no longer classified with CER code 020204; as required by the latest Integrated Environmental Authorisation, relating to the aforementioned plant, in force from February 2024..

WASTE DIVERTED FROM DISPOSAL (tons)	VALUE
<b>37. b) Total</b>	<b>35,580.50</b>
<b>37. b) Hazardous waste</b>	<b>311.70</b>
37. b) i. Preparation for reuse	0.36
37. b) ii. Recycling	1.89
37. b) iii. Other recovery operations	309.45
<b>37. b) Non-hazardous waste</b>	<b>35,268.80</b>
37. b) i. Preparation for reuse	0
37. b) ii. Recycling	8,577.15
37. b) iii. Other recovery operations	26,691.65
WASTE DESTINED FOR DISPOSAL (tons)	VALUE
<b>37. c) Total</b>	<b>5,269.26</b>
<b>37. c) Hazardous waste</b>	<b>333.24</b>
37. c) i. Incineration	227.82
37. c) ii. Landfill	36.36
37. c) iii. Other disposal operations	69.06
<b>37. c) Non-hazardous waste</b>	<b>4,936.03</b>
37. c) i. Incineration	1,275.44
37. c) ii. Smaltimento in discarica	1,739.47
37. c) iii. Other disposal operations	1,921.12
<b>37. d) Non-recycled waste</b>	<b>5,269.26</b>
<b>37. d) Percentage of non-recycled waste</b>	<b>12.90%</b>
<b>37. a) Total waste</b>	<b>40,849.76</b>
HAZARDOUS AND RADIOACTIVE WASTE (tons)	VALUE
<b>39. Total amount of radioactive waste</b>	<b>0</b>
<b>39. Total amount of hazardous waste</b>	<b>644.94</b>



**SOCIAL**  
INFORMATION

## ESRS S1 - Own workforce

ESRS 2  
SBM-2

### INTERESTS AND VIEWS OF STAKEHOLDERS

The Company recognises the central role of its workers as essential and strategic components of the organisation's sustainable development and long-term success. In this perspective, it promotes ongoing, structured, and transparent dialogue with its staff, enhancing their skills, actively listening to their opinions and needs, and protecting fundamental rights in every operational context. The outcomes of this participatory process contribute concretely to guiding strategic decisions and shaping the corporate governance system, with the aim of ensuring a fair, inclusive work environment capable of generating shared value.

Within the materiality analysis conducted by INALCA, several particularly relevant topics were identified. In particular, two positive impacts emerged: the first concerns **fair remuneration**, understood as the guarantee of a salary level adequate to ensure a decent standard of living for all family members; the second concerns the **training and professional growth** of workers, considered a fundamental element for skills development, professional empowerment, and the valorisation of human capital. At the same time, three negative impacts have been identified, one current and two potentials. The current impact is represented by **workplace accidents**, an issue the Company addresses with the utmost care through the adoption of the ISO 45001 standard, conducting periodic audits, and continuously updating safety training courses, including specific courses on the correct use of tools and machinery. These initiatives aim to reduce the risk of accidents and increase worker awareness of prevention. Potential impacts, however, concern the risk of **discrimination and non-inclusive practices** within the workplace, as well as the potential violation of employee **privacy**. In these areas, the Company is strongly committed to promoting employee awareness and implementing preventive measures aimed at ensuring an increasingly respectful, inclusive, and safe professional environment.

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

ESRS 2  
SBM-3

The workforce impacts identified in the assessment process described in ESRS 2 IRO-1 are closely linked to the Group's business model and strategy. In accordance with the disclosure requirements set forth in ESRS 2, INALCA considered all its workforce members who may be directly and indirectly impacted in its materiality analysis, without distinctions or considerations based on specific characteristics. The Group's workforce includes employees, classified by contract type, gender, and professional category. Collaborators and self-employed workers are also considered.

INALCA's impact analysis revealed that, among the positive aspects, fair employee remuneration and ongoing on-the-job training opportunities play a key role, considered strategic levers for enhancing human capital and promoting personal and professional growth. Throughout 2024, the company offered courses, both in-person and online, confirming its ongoing commitment to strengthening internal skills and improving the quality of its work. Training activities focus primarily on several key areas. First, new hires are onboarded through a program that integrates operational and theoretical training. Special attention is paid to occupational health and safety and environmental protection, ensuring all employees are aware of risks and best practices. Training also includes aspects related to production hygiene and quality principles, ensuring high standards in the execution of activities. Finally, training programs address ethical principles, corporate codes of conduct, and human rights, promoting a responsible and informed corporate culture.

These initiatives, in addition to producing tangible benefits for individual workers, also contribute to strengthening the organisation's competitiveness, in line with its long-term strategic objectives.



During the Double Relevance analysis, three negative impacts on the internal workforce were identified. The first concerns workplace accidents, which are generally attributable to individual incidents related to specific operational or behavioural conditions. However, if recurring or widespread trends are observed across multiple plants, these impacts could become systemic, necessitating enhanced prevention and safety control measures. In this regard, the Company is committed to preventing and managing risks related to worker health and safety, including through the adoption of a structured Management System, certified in accordance with the ISO 45001 standard and already implemented in several Group units. In contexts where certification is not yet available, INALCA applies the same principles and management standards inspired by the standard, ensuring a consistent and uniform approach to workplace safety throughout the organisation and in compliance with applicable regulations. Potential negative impacts have also been identified, including potential repercussions related to non-inclusive workplace practices, potentially impacting employee satisfaction and motivation due to discrimination, as well as the potential for improper handling of its workforce's personal data, resulting in a risk of privacy violations. INALCA, aware of the importance of these issues, has always placed the utmost emphasis on adopting preventative measures and specific protocols aimed at ensuring a fair work environment that respects individual rights and complies with applicable regulations. Furthermore, in the event of any disputes related to personal discrimination, and to enable all stakeholders in its value chain to report conduct deemed inappropriate, the INALCA Group has introduced a *whistleblowing system (Reporting Procedure)* consisting of dedicated communication channels, available at: <https://www.inalca.it/it/corporate-governance/>. The procedures and operating instructions for using the reporting channels are outlined in a specific *Whistleblowing Policy*, which regulates how reports are handled, ensuring the anonymity and confidentiality of the whistleblower's identity and information at every stage of management.

Regarding financial risks, two have been identified that are closely related to the management of social impacts. The first concerns the risk of incurring penalties resulting from any non-compliance with workplace health and safety regulations; failure to comply with applicable regulations could lead to an increase in accidents, the initiation of legal disputes, and the imposition of financial penalties on the Group. These risks are prevented by adopting the aforementioned Management Systems. The second risk concerns potential violations of personal data protection legislation, which could result in sanctions from the competent authorities, as well as negative repercussions on the company's reputation and a consequent loss of trust among employees and stakeholders. The Group takes all necessary measures to prevent such occurrences, in compliance with Regulation (EU) 2016/679 – GDPR (General Data Protection Regulation).

ESRS  
S1-1

**POLICIES RELATED TO OWN WORKFORCE**

With a view to actively engaging and empowering its workforce, the INALCA Group promotes the dissemination and full understanding of the ethical principles and human rights on which its business is based. To this end, it shares its Code of Ethics with all employees, collaborators, self-employed workers, and suppliers in the supply chain, requiring their signature as a prerequisite for initiating and maintaining any collaborative relationship. Additionally, the Code of Ethics is made available to all employees upon hiring and remains constantly accessible through the dedicated company portal. Furthermore, to ensure maximum transparency and accessibility, the Code is published on the company website, making it accessible to all external stakeholders.

To protect the integrity of individuals and respect for fundamental rights, the Code of Ethics expressly prohibits forced or compulsory labour, child labour, and human trafficking, as well as any form of discrimination based on race, ethnicity, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national origin, or social status. In order to monitor any reports of any human rights disputes listed above, both from its own workforce and external stakeholders, INALCA has implemented a simple, smartphone-accessible Whistleblowing System to report any violations. The Code expresses the ethical commitments and responsibilities assumed by those who, in various capacities, contribute to the achieve-

ment of INALCA's objectives, and includes: shareholders, employees, collaborators, external consultants, suppliers, customers and other parties. These parties, collectively, are referred to as stakeholders, as they have interests related to the company's activities. Everyone working within the Group, as well as in its controlled entities, to which the Code applies, is required to always act in compliance with the provisions of the Code. The value and importance of the Code are reinforced by the provision of specific liability for entities resulting from the commission of crimes and administrative offenses relevant to the purposes of Legislative Decree 231/2001.

This approach fosters a culture of social responsibility throughout the value chain, strengthening the commitment to a sustainable development model that respects fundamental rights. The INALCA Group demonstrates a strong commitment to social sustainability through the adoption of policies aimed at managing the impacts, risks, and opportunities associated with its workforce. These policies, which are part of a broader social responsibility framework, address several key areas: from risk and impact assessment, conducted through the **Risk Assessment Document (RAD)**, to the promotion of inclusion and diversity, ensured through the distribution of the company code of ethics and the annual organisation of Italian language courses for foreign workers. Regarding health and well-being, the company provides refreshment areas and a company canteen, demonstrating its commitment to the physical and mental well-being of its employees. Furthermore, engagement and internal communication are encouraged through open and structured dialogue, which allows for feedback to be gathered and areas for improvement to be identified. To prevent potential litigation regarding crimes committed by individuals that may affect the business, including those related to health and safety at work, the company has adopted the **Organisational Model**, drafted by the Compliance Office in compliance with **Legislative Decree 231/2001**, in several Group companies. This Model represents a comprehensive system of principles, rules, procedures, and controls that the relevant company adopts, based on an assessment of existing risks, to prevent the commission of such crimes by its employees and collaborators. The relevant company also has a structured procedural system, which the relevant offices and the entire workforce of the companies themselves must adhere to. Implementation of the Model includes training, internal and external auditing, and the ability to submit free and anonymous reports regarding any non-compliance or negligence in its proper application. The Supervisory Body, in collaboration with the Compliance Office, evaluates the reports received and defines any necessary corrective actions. Once the principles and rules have been defined, the Model must be communicated and shared: only through accurate information and full understanding by all can its effectiveness be guaranteed and the Company as a whole be exempted from liability. To this end, INALCA S.p.A., as the parent company, has established a comprehensive information dissemination system aimed at all internal and external stakeholders, implemented in the following ways:

1. **Illustration of the Model**, in its entirety and in its specific aspects, upon hiring of new staff;
2. **Publication of documents** on the home page of the company website [www.inalca.it](http://www.inalca.it);
3. **Placement of documents** in the SIMPLEDO «Corporate Repository»;
4. **Availability of paper copies** of the Model at the Human Resources, Internal Audit, and Compliance offices;
5. **Inclusion of specific clauses** in contracts with third parties requiring compliance with applicable regulations and knowledge of the Model.

Through these tools, INALCA confirms its commitment to promoting a corporate culture based on legality, transparency, and accountability, ensuring full compliance with the principles of Legislative Decree 231/2001.

Regarding the health and safety of its workforce, several Group companies have implemented Management Systems certified according to **ISO 45001**, demonstrating their concrete commitment to managing occupational health and safety according to recognised international standards. This certification attests to the adoption of a structured system to prevent accidents, improve working conditions, and promote a shared safety culture at all levels of the company. In locations where this Management System is not in

place, the Group applies the same principles and criteria required by the standard, as well as by applicable regulations, ensuring a uniform approach to protecting the health and well-being of workers. Through internal procedures, ongoing training, periodic monitoring, and the adoption of preventative measures, the company ensures high safety levels throughout its production system, regardless of formal certification. The INALCA Group also adheres to the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, recognising the importance of a responsible and transparent approach in managing relationships with its employees and stakeholders. These international standards form the ethical and operational framework upon which the company's policies regarding human rights, working conditions, inclusion, equal treatment, and the fight against all forms of exploitation are based. To ensure the effective application of these principles, INALCA has implemented and intends to implement specific control and verification mechanisms, including internal audits and periodic assessments. Specifically, in addition to the provisions of the ISO 45001 standard, in the context of the adoption of the ethical and social **SMETA** (*Sedex Members Ethical Trade Audit*) certification at some INALCA locations, internal audits will be implemented to monitor compliance with ethical and social requirements relating to its business activities. These audits cover fundamental human rights aspects, such as freedom of association, occupational health and safety conditions, the prevention of child and forced labour, and the responsible management of working hours and wages. The results of these audits are an important lever for continuous improvement and for strengthening the company's commitment to a work culture based on respect, dignity and legality. To ensure greater dialogue and discussion among its employees, as well as transparency regarding issues such as fair remuneration, the company implements the National Collective Bargaining Agreement for the Food Industry. It also promotes opportunities for dialogue and discussion through periodic meetings with trade unions, where second-level agreements are drafted to improve working conditions and work-life balance. Workers elect their own Representatives of the Union (RSU), made up of colleagues actively involved in company decision-making processes.

**INALCA HAS CORPORATE POLICIES AND CODES OF CONDUCT IN THE FOLLOWING AREAS:**

 <p>Code of Ethics Code of Business Conduct Adoption of the principles of the "Modern Slavery Act" Adoption of EU Regulation 679/2016 (GDPR-Privacy)</p>	 <p>Video Surveillance Fraud Prevention Management of Inspections and unannounced controls</p>
 <p>External Social Media Policy Management Internal Social Media Policy Management Internal Social Media Policy for employees/contacts, department managers involved in the opening and management of the Websites and Social Media</p>	 <p>Quality-Environment-Safety-Social Responsibility Policy Sustainable procurement and protection of the Amazon Rainforest Good hygiene, health, safety, and environmental practices at the plant INALCA Laboratory quality policy for food safety</p>

**PROCESSES FOR ENGAGING WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES ABOUT IMPACTS**

ESRS S1-2

INALCA actively promotes workforce and employee representative engagement processes to ensure constructive and participatory dialogue, particularly regarding occupational health and safety. Employees, through the **Unified Trade Union Representatives (RSU - Italy)**, have the opportunity to make their voices heard and influence management decisions in this area, ensuring that identified needs and concerns are taken into account. Workforce engagement also occurs directly, through regular inspections conducted by the **HSE team** in production departments, aimed at continuously monitoring the workplace. Employees, delegated by the **Workers' Safety Representatives (RLS - Italy)**, are also involved in periodic discussions, at least annually, during the periodic meeting required by Article 35 of Legislative Decree 81/08, during which working and safety conditions are analysed and reassessed. In addition to on-site inspections, engagement takes shape through training activities and structured dialogue, aimed at fostering awareness and sharing prevention practices. Finally, it is important to note that some employees, selected by the Sustainability Team for their skills and areas of expertise, are involved in the reassessment and updating of the Double Materiality analysis, through specific questionnaires designed to gather their feedback in order to identify the impacts, risks, and opportunities related to the INALCA Group's activities.

**PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKFORCE TO RAISE CONCERNS**

ESRS S1-3

The INALCA Group, in compliance with the principles of legality, transparency, and responsibility, has adopted a structured whistleblowing system to securely and confidentially manage reports of behaviour that does not comply with the Code of Ethics, the Anti-Corruption Code of Conduct and Model 231. Reports, which may come from employees, collaborators, suppliers, customers, or partners, are submitted through written or verbal channels, including electronic channels, ensuring anonymity and protection from retaliation. Management is entrusted to the Legal & Compliance Office in collaboration with the Supervisory Board, via a dedicated platform that allows the traceability and monitoring of reports. INALCA promotes awareness of the issue through training and internal communications, ensuring that each report is treated confidentially and verified to determine its validity and any corrective actions. Penalties are applicable for violations of safeguards or malicious reports. As part of the Dual Materiality analysis, the Group identified two main negative impacts: workplace accidents and potential risks associated with discrimination and non-inclusive practices in the workplace. With regard to the management of workplace accidents, as well as with a view to responsible management of the health and safety of its own employees more generally, the organisation adopts a management system compliant with the ISO 45001 standard at most of its sites. Additionally, the INALCA Castelvetro plant has obtained SMETA (4-pillar) certification, with the intention of extending this system to the Group's main INALCA sites by 2025.

Regarding supply chain risks, **INALCA** has developed a **Code of Conduct for Sustainable Development**, which integrates environmental, social, and economic principles into production processes, promoting responsible agricultural practices and the protection of workers' rights throughout the entire supply chain.

This integrated approach demonstrates the company's commitment to sustainability, safety, and social responsibility, contributing to the reduction of negative impacts and the consolidation of an ethical, transparent, and continuously improving business model.

**TAKING ACTION ON MATERIAL IMPACTS ON OWN WORKFORCE, AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS**

ESRS  
S1-4

In accordance with the ESRS S1-4 standard, the Group adopts a structured and systematic approach to managing significant impacts related to its workforce, with the aim of preventing risks and leveraging related opportunities. The organisation implements specific measures to ensure fair, safe, and inclusive working conditions, while promoting skills development and overall employee well-being.

As part of the Double Relevance analysis, the Group identified three main negative impacts related to its workforce: workplace accidents, discrimination and non-inclusive practices, and the risk of breaches of employee personal data. To effectively prevent and manage workplace accidents, the Group has adopted a comprehensive and constantly updated health surveillance system. This includes preventive and periodic medical examinations to assess workers' suitability for their assigned tasks, promptly identify any health and safety risks, and define the necessary corrective measures. These activities are regulated by health protocols defined by the company physician, based on the employer's risk assessment, and also include special cases, such as job changes, returns after prolonged absences, or specific health conditions. Health information is managed in full compliance with professional secrecy and contributes, through ongoing risk and suitability mapping, to the informed and safe deployment of personnel. Regarding the health and safety of its own workforce, it is important to note that several Group companies have implemented



**ISO 45001**-certified management systems, confirming their concrete commitment to managing occupational health and safety according to recognised international standards. At the same time, to promote the well-being of its workers, the Group offers supplementary healthcare, which can be extended, where possible, to employees' families.

Regarding equal opportunities and the prevention of discrimination, the Group promotes initiatives aimed at promoting the inclusion and integration of all workers. These include Italian language courses for foreign employees, aimed at improving internal communication, understanding of company procedures, and equal access to information and training. These actions contribute to creating a respectful, inclusive, and empowering work environment. Furthermore, INALCA, in collaboration with trade unions, defines specific second-level contracts, which are discussed and updated annually. These supplementary agreements aim to improve working conditions, provide financial incentives, enhance corporate welfare measures, and promote a positive and participatory organisational climate, strengthening the relationship between the company and its staff.

With regard to the protection of employees' privacy and personal data, the Group adopts all necessary measures to prevent the risk of unauthorised disclosure of sensitive data, in accordance with Regulation (EU) 2016/679 – GDPR. In this context, specific training programs are developed to raise staff awareness of the importance of confidentiality, the proper use of personal information, and best practices to prevent violations.

Regarding the positive impacts identified following the Double Relevance analysis, fair remuneration, as well as employee training and development activities, were identified as key issues for the Group. Regarding fair remuneration for its employees, the Group ensures fair remuneration conditions consistent with applicable collective bargaining agreements, guaranteeing a decent standard of living for all workers and their families, including at its foreign offices. This commitment is supported by periodic monitoring of remuneration policies and the consistent application of the applicable national collective bargaining agreement.

The company also invests in the professional growth of its staff through a structured training program, including introductory courses for new hires and specialisation courses for specific roles, also delivered via a dedicated e-learning platform. Training activities focus on priority thematic areas, such as:



**E-LEARNING TRAINING**

- ▶ **the onboarding of new hires, through training and initial training;**
- ▶ **occupational health, safety, and environmental protection;**
- ▶ **production hygiene and quality principles;**
- ▶ **ethical principles, corporate codes of conduct, and human rights.**

ESRS TOPIC	AREA OF INTERVENTION	SPECIFIC ACTIONS
ESRS S1 OWN WORKFORCE	Fair remuneration for employees and independent contractors at Group locations	Regular monitoring of remuneration policies and the relevant national collective bargaining agreement (CCNL) to ensure a decent standard of living for all members of the Group's workforce.
	Training and skills development	Training program that includes entry-level courses, followed by job-specific training, including the use of a dedicated e-learning platform where appropriate, to ensure ongoing professional development. The <i>INALCA Butchers Academy</i> is scheduled to open at the INALCA Poland site in 2025.
	Accidents at the workplace	A comprehensive and up-to-date health surveillance system, preventive and periodic medical check-ups to assess suitability for duties, health protocols defined by the company physician, monitoring in the event of job changes or returns from long-term absences, and worker risk and suitability mapping.  Adoption of an ISO 45001 certified management system in various Group locations.  Implementation of specific Risk Assessment Documents (RAD).
	Discrimination and non-inclusive practices in the workplace	Italian language courses for foreign employees, promotion of equal opportunities in access to healthcare information and services. Promoting an inclusive work environment through dedicated training and personal support for employees, with initiatives such as supplemental healthcare and opening bank accounts in the developing countries where the Group operates.  Anonymous reporting system via a dedicated online portal.
	Risk of non-compliance with health and safety regulations	Periodic reviews of the integrated Quality, Environment, Health and Safety management system, definition of health protocols based on risk assessments, prevention and control of the use of chemicals in high-risk roles.
	Risk of breach of employee privacy	Measures compliant with current legislation on personal data protection, training courses on confidentiality and the proper use of information, adoption of best practices for data protection, and management of health information in compliance with professional secrecy.

**TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES**

In compliance with the ESRS S1 standards for workforce management, INALCA is committed to ensuring fair, safe, and diverse employment conditions in all its operating units. This includes ensuring fair compensation for all its employees, supported by constant monitoring of salary policies and the implementation of national collective bargaining agreements, with the aim of maintaining an adequate standard of living for employees and their families. As part of its training activities, the organisation also continuously invests in the professional development of its staff through an e-learning platform, active since 2022, which delivers specific programs based on the skills required for each role. In addition to dedicated platforms, training activities also take place through in-person courses and workshops. For example, in October 2023, key members of INALCA Group's top management participated in a training workshop on the circular economy, entitled "**The Beef Ecosystem**," aimed at exploring the sustainability themes and development activities implemented by INALCA. In this context, a training program focusing on the CSRD and EU Taxonomy regulations is also planned for 2025, aimed at administrative, management, and control bodies, as well as the Sustainability Team.

In the area of occupational health and safety, the Group achieved tangible improvements, with a **reduction in accidents** from 320 in 2023, to 271 in 2024. This was achieved thanks to rigorous periodic monitoring and targeted preventive interventions, and the adoption of an ISO 45001-compliant management system, currently covering over half of the Group's production sites. The company also promotes an inclusive environment, actively combating all forms of discrimination through consistent and continuous access to dedicated tools and resources. At its **production sites in Africa**, for example, the Group is committed to guaranteeing its employees **fair and transparent contractual conditions**, offering wages commensurate and appropriate to their socioeconomic context, aimed at ensuring a decent standard of living. Furthermore, to promote financial inclusion and independent resource management, the Group promotes the opening of bank accounts for all workers, offering dedicated support. Complementing this integrated approach, the Group provides specific **insurance coverage, private medical care and dedicated healthcare services**, with a focus on **prevention** and the overall well-being of employees, thus contributing to a safe and sustainable working environment. Finally, regarding the protection of personal data, the Group has fully integrated, where applicable, Regulation (EU) 2016/679 (GDPR) within its European facilities, adopting advanced security measures and ensuring compliance with applicable national privacy regulations in non-European countries. This approach ensures a uniform level of protection of employees' personal data across all operational contexts in which the Group operates.

**IBA – INALCA BUTCHERS ACADEMY**



The "Akademia Rzeźników Inalca Poland" is a training project promoted by INALCA Poland, a subsidiary of the Cremonini Group, with the aim of training new professionals in the butcher trade, starting in 2025. The program is designed for those who wish to acquire technical skills in a highly specialised sector with good employment prospects. The training is paid from day one: participants will be hired with an employment contract and will immediately begin a structured training program. The Academy combines theoretical and practical training, both in the classroom and on the job, and provides everything needed to get started: teaching materials, workwear, and ongoing technical support. Upon completion, participants will receive a certificate of participation. The project is designed for those who wish to learn a concrete profession, enter the workforce directly, and be part of a large industrial company like the INALCA Group, active in beef processing internationally.



ESRS TOPIC	OBJECTIVE	TARGET	BASE LINE	BASE VALUE	STATE OF PROGRESS
ESRS S1 OWN WORKFORCE	Ensure fair remuneration for its employees and non-employees in its Group locations	Ensure continuous monitoring of remuneration policies and the applied collective bargaining agreement to guarantee a decent standard of living for workers and their families.	1963	Year of Foundation of INALCA S.p.A., Castelvetro di Modena.	Continuous monitoring 
	Strengthen training and continuous skills development	Consolidate and constantly update skills to ensure continuous professional development and improvement of individual and organisational performance through a dedicated e-learning platform.	2022	Platform not implemented	Usability of the platform enabled, in line with the specific skills required by individual tasks. 
		Increase in hours of training on sustainability for top management.	2022	0	176 hours of training were provided in 2023. A four-day course focusing on CSRD and EU Taxonomy is planned for 2025. 
	Reduction of workplace injuries	Increase in training hours in Italy and abroad.	2021	44,457 total hours of training provided.	47,781 total hours of training provided. 
		Constant improvement of regular checks and timely interventions to reduce risk situations and prevent accidents in the workplace.	2023	320 injuries	271 injuries in the year 2024. Monitoring and continuous improvement. 
	Promote an inclusive work environment, preventing and combating all forms of discrimination	Ensure, in a homogeneous and continuous manner, access to effective company tools and resources, aimed at preventing and managing discriminatory or non-inclusive behaviours.	2006	Launch of activities for the establishment of a new production plant on the African continent	Guaranteeing adequate wages, regular employment contracts, and a bank account for employees in Africa. INALCA ensures access to insurance coverage, private healthcare, and dedicated health services. 
	Ensure ongoing compliance with occupational, health and safety regulations	Implementation of an integrated health and safety system according to ISO 45001 in the Group's main offices.	2012	0 % of the production sites.	31% of production sites in possession of the certification ISO 45001. 
	Prevent the risk of employee privacy breaches through the adoption of security and regulatory compliance measures	Adoption of Regulation (EU) 679/2016 GDPR-Privacy (where applicable).	2018	Implementation of the Regulation in question.	Regulation (EU) 2016/679 correctly implemented and applied in all Group plants (where applicable). 

### CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES

ESRS S1-6

Below is the total number of Group employees, broken down by gender and contract type.

OWN WORKFORCE	WOMEN	MEN	OTHER	NOT COMMUNICATED	TOTAL
50. a) Total employees	1,953	5,713	//	//	7,666
50. b) Permanent employees	1,750	5,357	//	//	7,107
50. b) Fixed-term employees	194	326	//	//	520
50. b) Variable-term employees	9	30	//	//	39

TURNOVER	VALORE
Number of employees	7,666
50. c) Number of employees who left	1,138
50. c) Employee turnover rate	15%

The company's methodology for determining the exact number of employees is based on the use of corporate management systems developed by each HR department within the various Group companies. These systems are central tools for collecting, updating and monitoring all personnel information in real time, including contractual changes, new hires, and terminations. The data collected is expressed in terms of individuals (headcount) and refers to the workforce at the reporting period end. This approach ensures the reliability, consistency, and constant updating of management information across the Group. The Group is committed to implementing a centralised system for personnel data management, aligned with current regulations and capable of ensuring even more integrated, transparent, and efficient human resources governance.

### CHARACTERISTICS OF NON-EMPLOYEE WORKERS IN THE UNDERTAKING'S OWN WORKFORCE

ESRS S1-7

The following shows the number of non-employee workers in INALCA's workforce.

NON-EMPLOYEE WORKERS	TOTAL
55. a) Total number of non-employee workers	1,520
55. a) of which self-employed (external collaborators and employees belonging to cooperatives)	770
55. a) of which workers provided by companies engaged in personnel recruitment, selection and staff supply.	750

The methodology used to derive the number of non-employee workers in headcount at the end of the reference period is based on a cross-analysis of data present in company records provided by the various HR offices, such as active contracts, issued tax documents, and recorded accesses to operating systems or workplaces.

ESRS  
S1-9

### DIVERSITY METRICS

The following tables provide a detailed representation of INALCA's staff composition, with particular reference to the breakdown of senior management by gender and the distribution of employees by age group. This data provides a useful overview of the demographic structure of the company's workforce and the level of representation of the various management categories within the organisation.

GENDER BREAKDOWN OF SENIOR MANAGEMENT	66. a) NUMBER	66. a) PERCENTAGE
Women	58	40%
Men	89	60%
Other	//	//
Not disclosed	//	//
<b>Total employees</b>	<b>147</b>	<b>100%</b>

NUMBER OF EMPLOYEES BY AGE GROUP	<30 YEARS	30-50 YEARS	> 50 YEARS	TOTAL
Executives	2	62	57	121
Managers	7	210	77	294
Officers	298	1,059	347	1,704
Workers	950	2,955	1,642	5,547
<b>Total employees</b>	<b>1,257</b>	<b>4,286</b>	<b>2,123</b>	<b>7,666</b>

PERCENTAGE OF EMPLOYEES BY AGE GROUP	<30 YEARS	30-50 YEARS	> 50 YEARS	TOTAL
Executives	0.03%	0.81%	0.74%	2%
Managers	0.09%	2.74%	1%	4%
Officers	3.89%	13.81%	4.53%	22%
Workers	12.39%	38.55%	21.42%	72%
<b>Total</b>	<b>16.40%</b>	<b>55.91%</b>	<b>27.69%</b>	<b>100%</b>

Data relating to employee age and gender are extracted directly from the company management system, which is the centralised system for collecting and managing personnel information. This information, provided by employees upon hiring and updated in accordance with current regulations on personal data management, allows for a clear and detailed view of the demographic composition of the workforce.

ESRS  
S1-10

### ADEQUATE WAGES

All Group employees are covered by the **National Collective Labour Agreement (CCNL)**, which guarantees comprehensive protection in terms of rights, working conditions, occupational safety, and adequate compensation. This approach reflects the Company's commitment to promoting a safe, fair and legally compliant working environment, offering each employee the necessary conditions for adequate professional development and operating in a context that fully complies with labour laws. Where applicable, the INALCA Group applies the specific national collective labour agreements for the sector to which each company belongs in all the companies in which it operates. These agreements also include specific references to

occupational health and safety, thus ensuring constant attention to worker protection. Collective bargaining also applies to outsourced workers, extending the protection and rights provided to this category of worker. Furthermore, the benefits provided for by the national collective bargaining agreement, originally intended for full-time employees, are also provided without distinction to part-time workers and those with fixed-term contracts, ensuring equal treatment and access to the same advantageous conditions.

### SOCIAL PROTECTION

The INALCA Group uses a transparent methodology to communicate the number of employees belonging to protected categories, ensuring full compliance with applicable privacy and inclusion regulations. Within the INALCA Group, each situation is assessed individually, with **particular attention to the needs of colleagues with disabilities**. Specific **support measures** are implemented to **promote full inclusion**, such as the **assignment of reserved parking spaces with assistance from colleagues** and the **possibility of adjusting working hours** to facilitate accompanying persons. Currently, the Group's workforce consists of **142 people belonging to these categories**, equivalent to approximately 2% of the total workforce. Data is collected during the hiring process and is managed through secure digital systems, ensuring data accuracy and the protection of sensitive information.

### TRAINING AND SKILLS DEVELOPMENT METRICS

The INALCA Group recognises ongoing training as an essential pillar for the professional growth of its employees and for constantly improving the quality of work. All employees, both men and women, undergo regular reviews. In 2024, a total of **47,781 hours of training<sup>1</sup>**, were provided, of which **15,893 in Italy** and **31,888 abroad**, through both in-person and online **learning**. This figure demonstrates the company's ongoing commitment to ensuring accessible, high-quality learning opportunities, regardless of the location of operations. Training activities are led by **teams of internal and external experts**, operating in various company areas, and focus on strategic topics for the business and the organisation's sustainability. Specifically, the training programs address:



- ▶ **The integration of new hires** through structured programs that combine practical and theoretical training, promoting effective onboarding consistent with corporate values;
- ▶ **Occupational health and safety**, with mandatory and specialised courses aimed at promoting a culture of prevention and environmental protection;
- ▶ **Processing hygiene and quality principles**, essential for ensuring high production standards and compliance with applicable regulations;
- ▶ **Ethical principles and codes of conduct**, included in the company's organisational model, with particular attention to human rights and corporate social responsibility.

<sup>1</sup> Please note that, at this time, it is not possible to provide precise figures regarding the average hours of training per capita, as not all Group companies have made complete and comparable information available. Similarly, reporting of training data by gender is not currently available uniformly across the Group.

ESRS  
S1-12

ESRS  
S1-13

An important development is the implementation, in 2023, of an **e-learning portal** developed in collaboration with a certified training provider. This tool has enabled the creation and dissemination of personalised content, designed directly by internal staff, in line with the specific needs of the various company functions. In 2024, digital training activities saw further development, thanks to the continuous expansion and updating of materials, making the platform a reference point for asynchronous training and independent learning. This approach confirms INALCA's commitment to investing in **innovative solutions** for enhancing skills, fostering a corporate culture oriented towards growth, responsibility and personal development. To support this commitment, INALCA **maintains active collaboration agreements with Fondo Impresa**, the leading Italian interprofessional fund for continuing education. Thanks to this partnership, the company is able to **activate funded training programs annually**, allocating **additional resources specifically** for employee professional growth. This allows for the expansion of the training offering, making it even more accessible, structured, and consistent with the company's strategic objectives. Furthermore, starting in 2025, INALCA Poland will launch the IBA, a training school designed to train new butchers. The course provides all the tools necessary to embark on a career in the meat industry and will conclude with the issuance of a certificate of participation. This is a concrete opportunity to enter the workforce and grow within an international group like INALCA. For further information, please see page 114.

ESRS  
S1-14

**HEALTH AND SAFETY METRICS**

Health surveillance consists of a series of clinical assessments aimed at identifying and eliminating potential hazards and minimising risks associated with work activities and the environment in which they are performed. These activities include **preventive medical examinations**, which are designed to verify the absence of contraindications to the performance of the assigned tasks and determine the worker's suitability for the specific role. Periodic medical examinations, established within a defined health protocol, are also required to regularly monitor the health of employees and confirm their suitability to perform certain tasks. The frequency of these checks is determined by the company physician, based on the employer's risk assessment. If, following the assessments, the doctor determines that the worker is totally, partially, or temporarily unfit for work, the employer, in collaboration with the prevention and protection service, implements the necessary measures to assign the worker, if possible, to an alternative task compatible with their health. Each worker also has the right to request a medical examination if, in the opinion of the competent physician, it is related to work-related risks or personal health conditions. Further assessments are performed upon job changes or upon return to work after extended periods of absence, to determine fitness to resume work. For jobs that pose particular risks to the safety and well-being of others, the employer also addresses the issue of **drug and psychotropic substance addiction prevention** by promoting dedicated training and prevention activities. The health and risk records of workers undergoing health surveillance are kept in compliance with privacy and professional secrecy. These documents are delivered to the worker upon termination of employment or upon their express request. Continuous updating of the risk assessment documentation, integrated with assessments of suitability for the job, allows for a detailed mapping of all facilities and the activities performed there, ensuring that each employee is assigned a job compatible with their physical and health status. As part of continuous improvement, INALCA Management conducts periodic reviews of occupational health and safety needs and objectives, defining the commitment of General Management and Senior Management within the **integrated Quality, Environment, Health, and Safety** system. These reviews are conducted at least once a year, based on the quarterly reports provided by the company's quality, environment and safety management systems. The objective of these reviews is to verify that the management systems remain adequate, relevant and effective, and that the results achieved are consistent with established policies and objectives. Finally, INALCA promotes its employees' **access to supplemental healthcare** beyond that provided by the National Health Service at its plants throughout Italy. These benefits also include services not strictly related to work, with the aim of promoting the overall well-being of employees and, where possible, their families.

HEALTH AND SAFETY IN THE WORKPLACE		EMPLOYEES	TOTAL
88. a)	Percentage of own workers covered by the company's health and safety management system based on legal requirements and/or recognised standards or guidelines	7,666	100%
88. b)	Number of deaths due to work-related injuries and illnesses	0	0
88. c)	Number of recordable workplace injuries	271	271
	Hours worked	11,399,835	11,399,835
88. c)	Recordable workplace injury rate	23.77	23.77

**OCCUPATIONAL DISEASES**

Within the context of work activities carried out within the Group's various sites, physical risks are undoubtedly those that can lead to occupational diseases if not properly managed. The main risks that have historically generated occupational diseases are those most widespread and associated with meat processing activities and can be identified as Manual Handling of Loads (MHL) and Bio-mechanical Overload of the Upper Limbs (SBAS). These risks affect a large portion of the production workforce at INALCA plants and, for this reason, have been monitored and managed for over 15 years to progressively reduce exposure levels. The above-mentioned risks have been managed primarily by implementing organisational measures such as careful management and scheduling of breaks, followed by the redesign of some workstations to make them more ergonomic, and finally, by the inclusion of aids that have helped reduce and, in some cases, completely eliminate the aforementioned risks. The trend of occupational diseases, their origin and what has been done to progressively reduce the levels of exposure to risks are periodically monitored by management thanks to the quarterly reports drawn up by the coordinator of the safety management system.



ESRS  
S1-17

### INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

Thanks to the adoption of a **Whistleblowing Reporting System**, the INALCA Group is able to constantly and accurately monitor the reports received, ensuring transparent control over the reported facts. It should be noted that, during the reporting period, no serious human rights incidents emerged related to the company's workforce, nor were any incidents of discrimination in the workplace detected, nor were complaints filed through dedicated channels.



## ESRS S2 - Workers along the value chain

### INTERESTS AND VIEWS OF STAKEHOLDERS

The company recognises the strategic importance of workers throughout the entire value chain, aware that the well-being, protection of rights, and development of human capital should not be limited to corporate boundaries, but extend to all entities with which INALCA collaborates. With this in mind, the company is committed to promoting constructive dialogue with suppliers and customers, raising awareness of the importance of ensuring their employees receive a sufficient level of income and wages to ensure decent living conditions. INALCA also encourages supply chain partners to invest in the training and professional development of workers, recognising these practices as a distinctive element of added value and competitiveness. The voluntary adoption of international standards, such as SMETA certification and ISO 45001, also represents an operational benchmark for third parties, with the aim of harmonising ethical practices and strengthening shared responsibility throughout the supply chain. This approach allows the dissemination of a work **culture based on fairness, safety, and continuous development**, contributing to the creation of sustainable value for the entire production ecosystem. The INALCA Group recognises that, within the value chain, particularly in the livestock and logistics segments, the lack of adequate controls over working conditions and hours can have significant consequences for the health and well-being of workers. The absence of structured oversight can lead to overwork, increased stress, poor operational safety, and, in the most serious cases, workplace accidents. These risks are often exacerbated by opaque contractual arrangements, the seasonality of the business, and the fragmentation of responsibilities along the supply chain. For this reason, the INALCA Group is committed to strengthening its system for monitoring and evaluating working conditions at critical suppliers, through more frequent audits and active dialogue with counterparties. The goal is to prevent risky situations, promote safe and sustainable working practices, and contribute, including through awareness-raising and training, to the dissemination of an ethical and respectful work culture throughout the value chain.

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

As part of the strategic management of impacts, risks, and opportunities related to workers in the value chain, the INALCA Group has identified a series of current impacts, both positive and negative, directly linked to the Group's business model and strategy. Among the positive impacts is the company's commitment to **promoting fair compensation for workers along the value chain**, through awareness-raising initiatives aimed at suppliers and customers, finalised towards ensuring sufficient wages and incomes to ensure a decent standard of living for all members of workers' families. Another positive impact concerns **training and professional development**, an area in which Inalca actively encourages suppliers and customers to invest in developing workers' skills. On the negative side, current **risks related to workplace accidents and the negative effects** of the procurement of goods and services have been identified, with particular reference to environmental and social impacts on local populations. These impacts, fully integrated into the company's strategic analysis, are managed through a **structured due diligence approach** aimed at preventing, mitigating, or, where possible, eliminating them. Furthermore, the potential for non-compliant working conditions and hours to arise in the value chain has been identified, particularly in the livestock and logistics sectors, where the lack of adequate controls can increase the risk of accidents, work overload, injuries, and stress. Such situations could generate legal consequences for the Group and compromise the sustainability and resilience of the value chain. Managing these risks is therefore a strategic priority for Inalca, also with a view to creating shared and lasting value with supply chain partners.

ESRS 2  
SBM-2

ESRS 2  
SBM-3

ESRS  
S2-1

### POLICIES RELATED TO VALUE CHAIN WORKERS

The company recognises the fundamental importance of respecting human rights throughout its entire value chain and is actively committed to ensuring fair, safe and respectful working conditions for each individual. In line with the United Nations Guiding Principles on Business and Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the company has adopted internal policies and a **Code of Ethics** that formalise these commitments. INALCA has also developed a **Code of Business Conduct** for all of the Group's business partners, which can be accessed via the QR code on the right. This document plays a fundamental role as it establishes a series of ethical principles and binding operational standards for all Group supplies. The Code of Business Conduct, together with the Code of Ethics, clearly defines the Group's expectations regarding respect for human rights, working conditions, environmental protection, and the principles of integrity and transparency. They represent essential tools for ensuring that supply chain partners adhere to the most relevant human rights values and ethical standards. The company adopts a proactive approach to promoting these principles, sharing them with its entire supplier network. Signing these documents is a fundamental and binding requirement for initiating and maintaining business relationships with INALCA, thus ensuring a shared and formally recognised commitment. This adhesion process allows for the creation of a shared culture of social responsibility, fostering greater awareness and the concrete implementation of best practices regarding human rights and decent work throughout the entire value chain.



See the  
"Code of Business  
Conduct"



The contents of these **codes** are explicit and unequivocal in **prohibiting any form of forced labour, child labour, or other exploitative practices**. They **also promote freedom of association, the right to collective bargaining, equal treatment, non-discrimination, and the guarantee of safe and decent working conditions**. In this way, INALCA is committed to protecting the fundamental rights of all workers indirectly involved in its activities, extending its social responsibility well beyond the company's boundaries. To ensure the effective implementation and compliance with these principles, INALCA has implemented rigorous monitoring and verification processes. Furthermore, some of the INALCA Group's plants are registered on the Sedex platform, a shared transparency and social responsibility system that allows for the continuous monitoring of their social and environmental performance, ensuring transparency and ongoing monitoring for stakeholders. This integrated framework of policies, codes, and controls demonstrates INALCA's concrete commitment to promoting an ethical and sustainable value chain.

ESRS  
S2-2

### PROCESSES FOR ENGAGING WITH VALUE CHAIN WORKERS ABOUT IMPACTS

INALCA, aware of the complexity of its supply chain, as well as the growing expectations of stakeholders regarding sustainability and social responsibility, has conducted an in-depth analysis to define priorities for action and strengthen dialogue with various stakeholders. Active and organised stakeholder engagement is a key tool for effectively guiding the Group's sustainability strategies, ensuring that corporate decisions are aligned with the needs and expectations of the market and the community. For more information on the process of engaging workers in the value chain regarding impacts, please refer to sections ESRS 2 SBM-2 and ESRS 2 IRO-1.

ESRS  
S2-3

### PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE CHAIN WORKERS TO RAISE CONCERNS

The INALCA Group, in compliance with the principles of legality, transparency, and accountability, has adopted a structured **whistleblowing** system aimed at ensuring the proper management of reports of conduct that does not comply with the Code of Ethics, the Anti-Corruption Code of Business Conduct, and

the Model for the Organisation, Management, and Control of the "Code of Business Conduct" pursuant to Legislative Decree 231/2001. Reports may be submitted by anyone interacting with the Company - including employees, members of corporate bodies, suppliers, customers, consultants, and partners - through secure and diversified channels, both written and verbal, including electronically via access to the INALCA website. The system, formalised in a specific policy available on the company website, guarantees the confidentiality of the whistleblower's identity and the information transmitted, including through encryption, and protects the whistleblower from any form of retaliation or discrimination. Reports are managed by the Legal & Compliance Office, which works in collaboration with the Supervisory Board (SB), in full compliance with applicable regulations, using a dedicated IT application managed by a specialised external provider. Each report is subject to a preliminary investigation to verify its validity and relevance, as well as to determine any corrective actions or controls to be undertaken. The system also provides for the traceability of reports and the ability for the reporting party to monitor their progress. The Group also adopts specific clauses in its contracts with suppliers and collaborators that provide for termination of contracts in the event of their violation of the provisions of the Code of Ethics, the Organisation, Management and Control Model pursuant to Legislative Decree 231/01, and the Code of Business Conduct. INALCA promotes internal awareness through training courses, visible communications at plants, and the distribution of informational materials upon hiring. The entire process is characterised by the utmost confidentiality and respect for anonymity, recognising that the report has the value of a warning that requires further investigation by the company. Penalties are applied in the event of violations of the reporting party's protections or in the event of unfounded reports submitted with intent or gross negligence, as regulated in Model 231 and the company's disciplinary system. As part of the Dual Relevance analysis conducted by the INALCA Group, two current negative impacts were identified. The first concerns accidents in the workplace, where the Group is committed to ensuring high safety standards through the adoption of a management system certified according to the ISO 45001 standard, as well as through SMETA certification at INALCA's main production sites, which is expected to be extended in 2025. These principles are applied not only at direct operational sites, but also extend to workers along the entire value chain, demonstrating the cross-functional commitment to protecting the health and safety of all those involved in production processes. The second negative impact is represented by the risks associated with the procurement of goods and services from suppliers. To manage these risks, INALCA has developed a Code of Conduct for Sustainable Development, a document that articulates the company's commitment to integrating the principles of environmental, social, and economic sustainability into its industrial processes. Specifically, the Code places a strong emphasis on the sustainability of the agricultural supply chain, promoting the sharing of knowledge, best practices, and innovative techniques to ensure responsible and sustainable development that does not compromise the resources and opportunities of future generations. The analysis also identified potential risks related to the presence of child labour and inadequate working conditions in the supply chain, including excessive working hours or those that do not comply with international standards. **To prevent such critical issues, INALCA requires all suppliers to formally adhere to the Code of Ethics and the Code of Business Conduct**, which are essential tools for ensuring respect for human rights, social, and environmental standards, and for promoting a culture of responsibility throughout the entire supply chain. This integrated approach demonstrates the Group's focus on sustainability and social responsibility, as well as its willingness to adopt concrete measures to minimise negative impacts, while protecting workers and promoting an ethical and transparent business model.

**TAKING ACTION ON MATERIAL IMPACTS ON VALUE CHAIN WORKERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS, AND EFFECTIVENESS OF THOSE ACTIONS**

ESRS S2-4

To manage the impacts, risks and opportunities relevant to workers along the value chain, the INALCA Group has undertaken a series of targeted actions, as reported in the following table.

ESRS TOPIC	AREA OF INTERVENTION	SPECIFIC ACTION
ESRS S2 WORKERS ALONG THE VALUE CHAIN	Fair remuneration from suppliers and customers	Raising awareness among its suppliers and customers in guaranteeing a level of income or salary sufficient to ensure a decent standard of living for all family members of workers in the Group's value chain, through the signing of a Code of Ethics and Business Conduct.
	Training and development of workers in the value chain	Improving the skills of workers in the INALCA value chain by raising awareness among suppliers and customers regarding the implementation of training and professional development activities.
	Accidents at the workplace	Adoption of ISO 45001 certification at some of the Group's sites; extension of best practices in health and safety management systems to all workers along the value chain.
	Non-compliant working conditions and hours	Continuous monitoring of working conditions; periodic supplier audits; adoption and enforcement of the Code of Ethics and Business Conduct; option to report non-compliance anonymously via a dedicated portal.
	Child labour and forced labour	Adoption and enforcement of the Code of Ethics and Business Conduct; periodic audits and controls to ensure compliance; option to report non-compliance anonymously via a dedicated portal.
	Social and environmental impacts related to suppliers	Sharing of the Code of Ethics, the Code of Business Conduct, and the Code of Conduct for Sustainable Development, along with dissemination of the "Good Breeder's Manual" within the supply chains; Adherence to the SQNZ regulations at the Group's main farms.

**SQNZ – NATIONAL LIVESTOCK QUALITY SYSTEM**

Ministerial Decree N°646632 of December 16th, 2022, establishing the Italian "National Livestock Quality System" (SQNZ), officially recognised the production specification "Standard: Sustainable Meat Livestock Farming Applicable to Beef Production." As part of this effort, INALCA will adopt the specification at its main company-owned farms starting in 2025, thus consolidating its commitment to ensuring direct and rigorous control throughout the entire production chain. Adherence to this specification requires compliance with stringent requirements regarding animal traceability, controlled feeding, responsible use of veterinary medicines, animal welfare, and sustainable management of environmental resources, including rapid landfilling of wastewater and calculation of the environmental footprint through a dedicated LCA analysis. This initiative is part of INALCA's broader strategic project aimed at promoting an integrated, transparent and sustainable supply chain, capable of effectively responding to the growing needs for quality, safety and social responsibility required by the market.

**TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES**

ESRS S2-5

In accordance with the ESRS S2 standard – *Workers in the Value Chain*, the company has defined and implemented a series of strategic objectives aimed at protecting and enhancing workers' rights along the entire supply chain. Specifically, the Group is committed to ensuring fair remuneration for workers involved

in its value chain through ongoing awareness-raising and engagement among customers and suppliers, signatories of the Code of Ethics and the Code of Conduct, tools introduced to promote compliance with shared principles of labour ethics and social responsibility. Furthermore, the Group promotes awareness of the need to continuously improve the skills of workers in the supply chain by encouraging the implementation of training and professional development programs, including through collaboration with partners and suppliers. Regarding workplace safety, the adoption of an ISO 45001-compliant management system at the Castelvetro di Modena plant represents a key element in fostering a culture of prevention, aimed at reducing accidents and strengthening active collaboration along the entire value chain. These objectives are pursued through systematic operational monitoring, periodic supplier audits, and the active involvement of workers in reporting and improvement processes. INALCA recognises respect for human rights and international regulations as a priority, adopting concrete measures to prevent and combat all forms of forced labour and child labour, promoting ethical, dignified, and sustainable working conditions. In this context, the Code of Ethics and the Supplier Code of Conduct are fundamental tools for establishing shared standards throughout the supply chain. Finally, as part of the integrated management of social and environmental impacts related to suppliers, INALCA promotes responsible agricultural and production practices through the sharing of the Code of Conduct for Sustainable Development, as well as through the dissemination of the "Good Breeder's Manual" active throughout the Group's supply chains. This is complemented by the adoption of the SQNZ (National Livestock Quality System) specification, which defines technical and management standards for sustainable livestock farming, as well as providing concrete support to livestock farmers in adopting practices in line with emerging market demands for sustainability.

ESRS TOPIC	OBJECTIVE	TARGET	BASELINE	BASE VALUE	STATE OF PROGRESS
ESRS S2 WORKERS IN THE VALUE CHAIN	Ensure fair remuneration for workers along the Group's value chain.	Continued awareness raising among suppliers and customers to ensure adequate remuneration to support a decent standard of living for the families of employees along the INALCA value chain.	2004	Year of adoption of the Code of Ethics applicable to all INALCA Group locations.	Continued awareness raising and gathering of signatures to the Code of Ethics and the Code of Business Conduct among customers and suppliers. 
	Ensure optimal working conditions and compliant working hours, promoting worker well-being and an effective work-life balance.	Continued awareness raising among suppliers and customers to promote fair and safe working conditions along the supply chain.	2004	Year of adoption of the Code of Ethics applicable to all INALCA Group locations.	Continuous awareness raising and ensuring customer and supplier compliance with the Code of Ethics and Code of Conduct through ongoing monitoring of operating conditions, periodic supplier audits, and active worker involvement in reporting and improvement processes. 
	Ensure full respect for human rights and international regulations, preventing and eliminating all forms of forced labour and child labour, and promoting ethical and responsible working conditions.	Ensure full respect for human rights and international regulations, eliminating all forms of forced labour and child labour, and promoting ethical and responsible working conditions.	2004	Year of adoption of the Code of Ethics, applicable to all INALCA Group offices.	Continuous awareness raising and ensuring customer and supplier compliance with the Code of Ethics and Code of Conduct. 

## ESRS S3 - Stakeholder communities

ESRS 2  
SBM-3

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Impacts on local communities along the entire value chain are closely linked to the organisation's strategic approach and business model, as evidenced by the assessments reported in section ESRS 2 IRO-1. The upstream activities and sectors in which the Group operates **may indirectly impact the rights of local communities due to the use of land and natural resources**. However, thanks to its position as a market leader with a strong local presence, the Group is able to create the conditions to generate positive impacts on the stakeholder communities. Through a wide range of products from the Italian agri-food supply chain and from responsible supply chains, **the Group promotes the development of local communities with full respect for people and the environment**. In all the countries in which it operates, INALCA is committed to pursuing the Sustainable Development Goals (SDGs), focusing in particular on **the eradication of poverty, the fight against hunger, the reduction of inequalities, and the strengthening of the social and economic fabric**. The company also protects workers' rights, adopting all necessary measures to prevent child and forced labour and ensuring a safe working environment for all employees and contractors, especially at its offices and suppliers located in countries with less stringent legislation than Italy. INALCA ensures fair and stable compensation for its workers, thus also generating indirect positive economic impacts. The business model developed in Africa allows employees to obtain regular contracts and access to financial instruments such as bank accounts, thus contributing to improving working conditions and the socioeconomic stability of their families. Furthermore, all employees have full access to health insurance, private healthcare, and dedicated health and prevention services. The dual-weighted impact analysis revealed both positive and negative impacts, without identifying significant risks or opportunities. Among the negative impacts and risks identified is the potential risk of human rights violations of local communities, related to the use of land and natural resources. In contrast, the Group's significant positive impact lies in its contribution to the development of local communities, fostered by strong relationships and the creation of indirect economic benefits.



### POLICIES RELATED TO AFFECTED COMMUNITIES

The Group recognises the strategic and social importance of local communities in the territories in which it operates, considering them key stakeholders for the creation of shared and lasting value. In every context, both national and international, the company promotes relationships based on dialogue, mutual respect, and the valorisation of the cultural, economic, and environmental characteristics that characterise each territory. In particular, the Group's consolidated presence in areas such as **Africa and Poland** demonstrates an **approach geared toward collaboration and shared growth, aimed at supporting initiatives that foster the sustainable development and social inclusion of the stakeholder communities**. Through active listening and concrete commitment, the Group aims to contribute positively to the well-being of communities, gradually integrating principles of responsibility and sustainability into its operating practices. While it does not yet have formally defined policies dedicated to local communities, the company is fully aware of the need to make these commitments increasingly structured, measurable, and consistent with its corporate values, with the possible introduction of a dedicated policy in the future.

### PROCESSES FOR ENGAGING WITH AFFECTED COMMUNITIES ABOUT IMPACTS

Local communities play a crucial role for the INALCA Group, representing a vital element in the creation of shared value and the promotion of sustainable and responsible development in the communities where the company operates. The Group fully recognises the need to integrate their contributions into decision-making and corporate impact management processes, encouraging active and responsible participation. As part of the Dual Materiality process, as discussed in the ESRS IRO-1 section, the stakeholder communities were involved through surveys conducted in the context of the impact materiality assessment conducted for the 2022 Sustainability Report, which is used as a reference in the current reporting. This approach has allowed us to consolidate lasting relationships based on mutual respect and social responsibility, and to progressively integrate community concerns into corporate sustainability strategies. Through this method, **INALCA strengthens its commitment to positively contributing to the development of local communities, generating increasingly significant and shared value**.

ESRS 2  
S3-1

ESRS 2  
S3-2

ESRS 2  
S3-3

**PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR AFFECTED COMMUNITIES TO RAISE CONCERNS**

The INALCA Group, aware of the significance of its economic, social, and environmental impact on the communities in which it operates, places particular emphasis on listening to and engaging with local communities and all stakeholders involved in its activities. The company recognises that effective management of any negative impacts, whether direct or indirect, is essential for promoting sustainable and responsible development. In this context, **upon receiving reports of behaviour that does not comply with the Code of Ethics, the Anti-Corruption Code of Business Conduct, or the 231/2001 Organisation, Management, and Control Model, the Company initiates a specific investigation involving the relevant functions, with the aim of ensuring the best possible implementation for stakeholder protection.** Reports may originate from any individual who, in any capacity, comes into contact with the various INALCA Group companies, including employees, members of corporate bodies (Board of Directors, Board of Statutory Auditors), independent auditors, customers, suppliers, consultants, collaborators, shareholders, and partners of the Group. To enable all Group stakeholders to report behaviour that is not in line with internal governance and control procedures, INALCA has adopted a whistleblowing system. Its purpose is to regulate the management of reports (from receipt to the investigation and outcome process) and to ensure the confidentiality of the whistleblower's identity and the information at every stage of its management. This system is formalised within a specific policy, uploaded to the company repository, and consists of information communication channels, including digital channels, designed to ensure the receipt, analysis, and processing of reports. These channels can be accessed via the QR code on the side. The policy specifically regulates the procedures for submitting information and **reports to the Supervisory Body, the main body responsible for monitoring compliance with corporate values, as well as with national and European regulatory provisions** that protect the interests and integrity of the Group. In the operational management of the internal reporting channel, the Group relies on the collaboration of a specific office, identified within the Legal & Compliance Office. The whistleblower can connect to the website via the QR code on the side, which will be present on each company's website and in information brochures. These can be submitted in writing, electronically, or verbally. Encryption tools are used, and the confidentiality of the whistleblower's identity, the person involved, and the person named in the report, the content of the Report, and related documentation is guaranteed. The report will be forwarded, according to the "information flow" system established by Legislative Decree 231/01, to the relevant Supervisory Body. The whistleblower management process recognises the importance of anonymity, as the report serves only as an alert. The entity must work to investigate, ascertain, and verify the veracity of the facts through the use of information tools that allow for anonymous dialogue with the whistleblower.



See the "Handling of reports"



Consult the 'Reporting System'

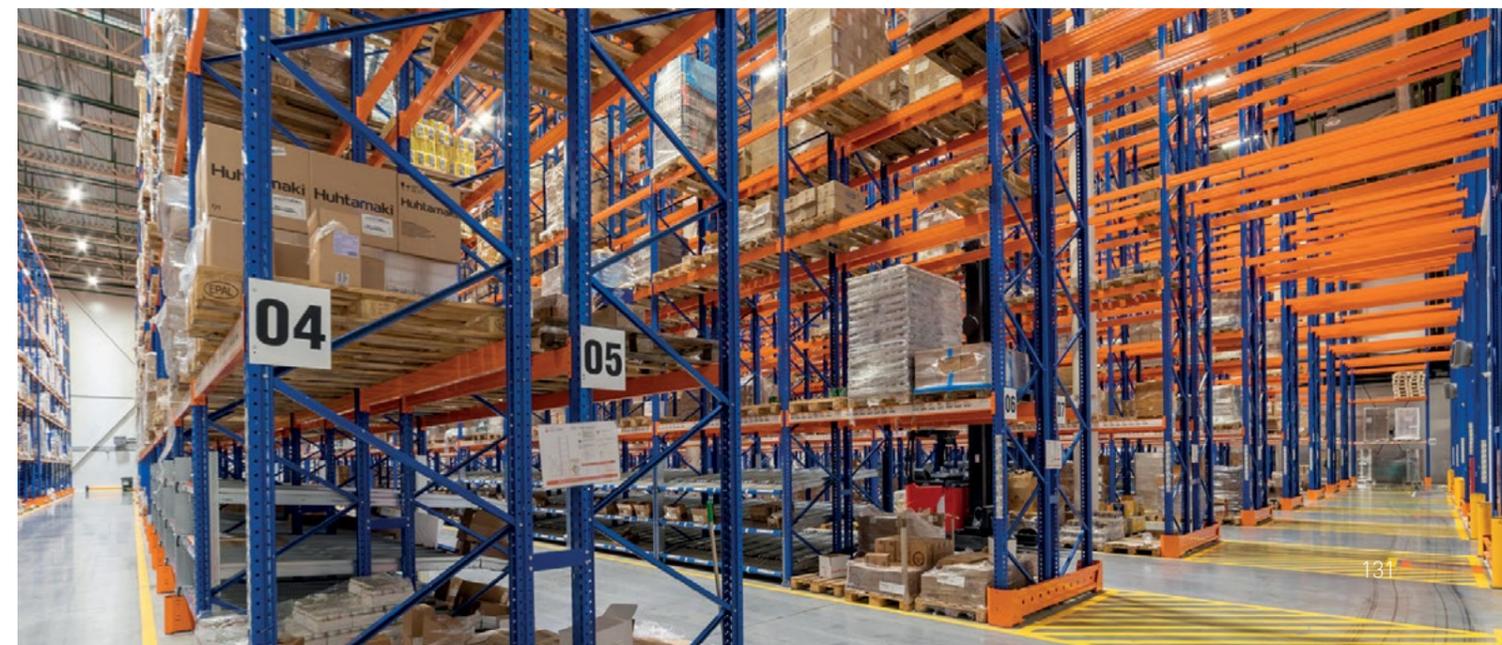
**TAKING ACTION ON MATERIAL IMPACTS ON AFFECTED COMMUNITIES, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO AFFECTED COMMUNITIES, AND EFFECTIVENESS OF THOSE ACTIONS**

ESRS 2  
S3-4

The INALCA Group recognises the importance of a responsible and sustainable approach in its relationships with the communities in which it operates. The company views the economic, social, and environmental development of local communities not only as an ethical duty, but also as a strategic element for consolidating its growth model. In this context, the Group is committed to promoting **initiatives that generate shared value, strengthening ties with local communities and leveraging local resources.** To this end, INALCA - Consult "Whispering Processing" Consult "Whispering System" - actively supports national and

local supply chains, contributing to the economic and social development of local communities and fostering the creation of jobs and shared value. This strategic choice allows it to consolidate relationships of trust with local communities, leveraging available resources, and promoting harmonious and sustainable development. Since the beginning of 2024, the company has launched a structured supplier management project aimed at fulfilling the obligations set forth in Regulation (EU) 2023/1115, known as the EUDR. This initiative includes, among other things, **assessing the ethical and social impacts in the regions where raw materials are sourced,** with the aim of preventing risks arising from unsustainable practices and promoting fair and responsible conditions along the entire production chain. Through this integrated approach, INALCA intends to strengthen its ability to monitor and manage social and environmental risks, while seizing the opportunities offered by sustainable development, in synergy with local communities. The Group places particular emphasis on regional growth and maintaining positive relationships with communities, generating significant indirect economic impacts. The company also fosters local growth through the creation of employment opportunities. In Africa, in addition to promoting direct jobs, including through the opening of a boning room, INALCA supports its employees through economic and social inclusion initiatives, including assistance in opening bank accounts and providing health insurance coverage. Additionally, the company operates local retail outlets, making quality food and products accessible to local communities, contributing to the socioeconomic development of developing areas. These initiatives aim to strengthen the economic stability and well-being of local communities, contributing to the sustainable development of the affected areas. At the same time, the Group ensures full respect for the rights of local communities regarding the use of land and natural resources. Before building new plants, INALCA conducts in-depth environmental and territorial assessments to analyse the impact on land use, biodiversity, and local wildlife. These assessments help prevent potential negative impacts and ensure a balance between production activities, environmental protection and the well-being of local communities.

ESRS TOPIC	AREA OF INTERVENTION	SPECIFIC ACTION
ESRS S3 STAKEHOLDER COMMUNITIES	Local development and community relations through indirect economic impacts	INALCA contributes to local development by offering job opportunities, including regions such as Africa and Poland. In Africa, in addition to direct job creation, the company supports workers in opening bank accounts and provides health insurance coverage, thus promoting the economic and social inclusion of local communities.
	Impact on the rights of local communities resulting from the use of land and natural resources	Before building new plants, the Group conducts environmental and territorial assessments to analyse the impact on land use, biodiversity, and the presence of wildlife and natural resources, thus ensuring respect for the rights and balance of local communities  Development of a Risk Assessment and Mitigation system in compliance with Regulation (EU) 2023/1115 (EUDR).



ESRS 2  
S3-5

**TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES**

In pursuing the creation of shared value and the sustainable development of the communities in which it operates, the Company promotes the economic and social growth of local communities through the opening of new plants in developing areas, contributing to the generation of skilled employment and strengthening the local economic fabric. Since 2006, this has led to the construction of a **first plant in Africa**, located in Luanda, followed by the opening of a total of seven plants across the continent, including distribution platforms and cutting plants. Furthermore, in 2022, it inaugurated a new plant in Poland dedicated to beef slaughtering and processing. This approach is part of a consolidated international presence: INALCA has been active in Africa since the 1980s and today operates through subsidiaries in **Algeria, Angola, Côte d'Ivoire, Mozambique, the Republic of Congo, and the Democratic Republic of Congo**. There, it manages **15 modern distribution** platforms, employs **460 people**, and distributed approximately **70,000 tons** of food products in 2024, ensuring quality, accessibility and continuity in the cold chain. The company thus contributes to the Sustainable Development Goals, particularly poverty reduction, food security, and the promotion of fair working conditions, ensuring the protection of human rights, the prevention of child and forced labour, workplace safety, universal access to health insurance, and formal contracts that foster financial inclusion and socioeconomic stability. Its growth in the region is also supported through replicable industrial investments aimed at creating integrated local supply chains. These include the construction of the most modern cutting plant in Algeria and the launch of the first industrial unit for the processing and packaging of beef and pork in Luanda, certified to ISO 9001, 14001, and 45001 standards. At the same time, the company supports the development of local agri-food operators through financing, purchasing, and distribution programs for supply chain products, as well as direct social support initiatives, such as donations to the Cuerama association in Angola.



**15**  
PLATFORMS IN  
AFRICA

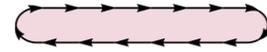
**460**  
EMPLOYEES

**70,000**  
TONS OF FOOD  
PRODUCTS  
DISTRIBUTED

To ensure full respect for the rights of local communities through a preventive risk assessment process regarding the impact on land use, natural resources, and wildlife, in accordance with the EUDR Regulation, INALCA will conduct a comprehensive mapping of the products purchased from its suppliers and supplied to its customers, by collecting the relevant customs codes (see Annex 1, EU Regulation 2023/1115) of the products subject to the obligations of the Regulation in question. This process will verify the need to apply the Regulation and create a clear and detailed picture of the supply network, identifying supplier risks and potential areas for improvement. INALCA will also implement specific software to manage data relating to the affected products, purchased and marketed, to ensure full compliance with the Regulation. Using this software, the company will be able to acquire information from its suppliers, perform a supply chain risk analysis, and integrate this information into its internal tracking systems and the documentation for each



shipment. Please note that, by the time this Sustainability Report is drafted and published, i.e., in the last quarter of 2025, the activities described above regarding the application of the EUDR Regulation may be subject to change and amendments, taking into account any amendments recently proposed by the European Commission to the original text of the Regulation (updated at the beginning of November 2025).

ESRS TOPIC	OBJECTIVE	TARGET	BASELINE	BASE VALUE	STATE OF PROGRESS
ESRS S3 STAKEHOLDER COMMUNITIES	Promote the economic and social growth of local communities by creating employment opportunities through the opening of plants in developing areas.	Opening of plants in key developing areas	2006	0	7 plants in Africa (distribution and boning platforms)  1 plant in Poland (beef slaughtering and processing plant)
	Ensure full respect for the rights of local communities through a preventive risk assessment process regarding the impact on land use, natural resources and wildlife, in accordance with the EUDR Regulation.	Ensure full respect for the rights of local communities through a preventive risk assessment process regarding the impact on land use, natural resources and wildlife, in accordance with the EUDR Regulation.	2024	No audit performed	Process in the start-up phase, in accordance with the development of regulations. 

## ESRS S4 - Consumers and end users

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

ESRS 2  
SBM-3

The impacts, risks, and opportunities related to customers and end consumers are closely linked to the INALCA Group's business model, as highlighted in the assessment processes described in ESRS 2 IRO-1. In accordance with the disclosure requirements of ESRS 2, as part of the materiality analysis, the INALCA Group considered all customers and end consumers who may be directly impacted by the products and services offered and indirectly through commercial relationships, without making distinctions based on specific characteristics. In assessing the risks and opportunities arising from the impacts and dependencies related to customers and end users, no particular situations involving specific groups of people were identified. The impacts, risks, and opportunities related to customers and end consumers affect all categories of INALCA Group customers, as well as all end consumers of the products marketed. These customers and consumers do not receive products that are intrinsically harmful to health, nor services that could compromise the protection of personal data, freedom of expression, or the principle of non-discrimination. Furthermore, they do not fall into the category of vulnerable individuals in terms of health or privacy. The materiality analysis identified a single potential negative material impact on INALCA's end consumers, which can be classified as related to a single incident in the event of a case of non-compliance regarding the **food safety** of a product. **For the Group, this aspect represents a fundamental principle that guides all operations, from raw material control to distribution management, ensuring high standards of quality and safety for all consumers.** The Group is also committed to providing customers and consumers with clear, transparent, and reliable information on the products offered, so they can make informed and safe choices. The impacts, risks, and opportunities related to consumers and end users, in turn, guide the company's strategy, directing it towards compliance with the highest quality standards and the continuous improvement of customer satisfaction and loyalty. At the same time, a positive material impact was also identified: the INALCA Group guarantees the supply of safe, high-quality, and nutritious products that meet people's dietary needs and food preferences. This commitment helps promote an active and healthy lifestyle, with particular attention to communities in the developing areas where INALCA operates. Within the context of the financial relevance analysis, two risks and one opportunity were identified. The first risk concerns the management of potential protests from groups opposed to the INALCA Group's activities, which could result in reputational damage. The Group, aware of the importance of protecting its image, is committed to managing any conflict situations with the utmost care and timeliness, adopting preventative measures and engaging in constructive dialogue with the stakeholders. The second risk is the potential non-compliance of products with food safety standards. The INALCA Group, in compliance with current regulations, is committed to consistently ensuring compliance with all safety and quality requirements through rigorous controls throughout the entire production chain, preventing any potential critical issues, including through the adoption of dedicated Quality and Food Safety Management Systems (e.g., ISO 9001, IFS, BRC). Finally, a significant opportunity has been identified: the creation of new product lines capable of meeting growing consumer demand for increasingly sustainable, safe, and nutritious food solutions. This initiative allows the Group to innovate its offering while strengthening brand value and customer satisfaction.



**POLICIES RELATED TO CONSUMERS AND END-USERS**

ESRS  
S4-1

To manage potentially negative impacts related to food safety and consumer health risks in a structured and effective manner, as well as to seize opportunities related to customer loyalty and strengthening the company's reputation, INALCA has adopted and implemented a **Quality, Safety, Environmental and Social Responsibility Policy**. This policy constitutes a strategic framework for the entire organisation, defining principles, objectives, and concrete commitments aimed at ensuring regulatory compliance, consumer protection, and the sustainability of production activities. Aware of its leading role in the agri-food sector, the Group has embarked on a process of technological and organisational evolution, investing in the development of its production technologies and the implementation of advanced control systems. The aim is to ensure full compliance with national and international requirements and rigorous management of all aspects of food safety. The policy integrates a preventative approach to risk management through **the systematic application of HACCP plans, internal and external audits, analytical controls, and ongoing staff training programs**. Particular attention is paid to disseminating a culture of quality and food safety at all levels of the company, strengthening awareness and individual responsibility in managing critical processes. At the same time, INALCA operates in full compliance with the legality and authenticity of its products, ensuring transparency, traceability and integrity throughout the entire supply chain. It also promotes a responsible approach to the environment and energy efficiency, with practices aimed at reducing their impacts. Worker health and safety are a fundamental pillar of the company's strategy, which is pursued through preventative measures, ongoing training and a safe and inclusive work environment. The company also promotes ethical and conscious behaviour in corporate social responsibility, contributing to the sustainable development of the communities in which it operates. By adopting high and transparent standards, INALCA strengthens stakeholder trust, consolidates its reputation, and ensures that each employee plays an active role in ensuring the quality and safety of products destined for the end consumer. These principles are transformed into an opportunity to innovate, differentiate its offering, and proactively respond to the needs of an ever-evolving market.

**PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS**

ESRS  
S4-2

INALCA, aware of the complexity of the sector in which it operates and of the growing expectations of stakeholders regarding sustainability and corporate responsibility, has conducted an in-depth analysis to identify strategic priorities for action and strengthen dialogue with its stakeholders. Structured and ongoing stakeholder engagement is an essential tool for effectively guiding the Group's sustainability strategies, ensuring that corporate decisions are consistent with the needs of the market, society, and the environment. For more details on consumer and end-user engagement, please see the ESRS IRO-1 section.

**PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS**

ESRS  
S4-3

In accordance with legality, transparency, and responsibility, the INALCA Group has implemented a whistleblowing system that allows employees, suppliers, and partners to safely report behaviour that violates the Code of Ethics, the Anti-Corruption Code, and the Corporate Organisational Model. Reports, managed by the Legal & Compliance Office and the Supervisory Board through a dedicated platform, guarantee anonymity, confidentiality, and protection from retaliation. Food safety is the fundamental prerequisite underlying every phase of INALCA's production and distribution process. The company's long-standing presence in highly regulated markets, such as the European Union, the USA, Canada, and Japan, as well as its adoption of the main voluntary food safety standards, have allowed INALCA to develop the most modern and advanced food hygiene and risk prevention techniques over time, incorporating them into an integrated management system that covers all of the Group's production facilities. The overall system

is therefore based on the identification of critical control points within each manufacturing process and provides the actions necessary to eliminate or reduce to an acceptable level significant food safety hazard, according to the HACCP (Hazard Analysis and Critical Control Points) model. Below are INALCA's founding food safety principles, which are adopted at all levels of the supply chain.



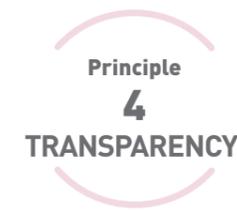
An optimal level of food safety is considered a prerequisite for all company production and is assessed using risk analysis methodologies



All company activities and processes that can influence food safety must be managed, monitored, and documented according to a defined hierarchy of references: laws and regulations, international technical standards, and specific requirements of companies using INALCA products.



The specific roles and governance system for food safety are clearly identified



The specific roles and governance system for food safety are clearly identified. Information regarding food safety must be clear, understandable, and accessible to customers, consumers, and regulatory authorities.



In its control criteria, INALCA uses internal audits, external audits of client companies, and, where applicable, certification audits according to voluntary technical standards and independent international bodies. The control and accuracy of information managed in the company's **product identification and traceability** system is a fundamental element supporting every action implemented for quality, food safety, and consumer communication. INALCA's production activities are planned to ensure process continuity and the supply of products compliant with specified requirements. Production processes are monitored through documents that identify, for each production phase, the operations, controls, equipment, and actions to be taken in the event of non-compliance. Products detected as non-compliant during processing are clearly identified and managed according to specific procedures to prevent their inadvertent use within the production process. Specific corrective actions are implemented to restore process compliance and prevent the recurrence of non-compliant results.



ESRS  
S4-4**TAKING ACTION ON MATERIAL IMPACTS ON CONSUMERS AND END- USERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO CONSUMERS AND END-USERS, AND EFFECTIVENESS OF THOSE ACTIONS**

To proactively and systematically manage the significant impacts that may affect consumers and end users, INALCA has developed a **comprehensive internal system** based on specialised risk management teams, including **HACCP groups at each production site and professionals dedicated to managing health, environmental and workplace safety emergencies**. This organisation allows the company to address any critical issues promptly and accurately, ensuring a high level of control throughout the entire production chain. INALCA has also adopted **operating procedures and management systems that allow for rapid intervention** in the event of detection of non-compliant products, **initiating withdrawal or recall processes even after distribution**, supported by clear protocols, continuous monitoring of quality performance, and the ability to respond immediately with effective and targeted corrective actions. The company continuously invests in staff training, promoting a corporate culture focused on responsibility and awareness of food safety, ensuring proper implementation of procedures and transparent communication with customers, regulatory bodies and institutions. Quality control activities are implemented through systematic monitoring of industrial processes, sampling, laboratory

analysis of food safety and product quality aspects, as well as the management of targeted "Food Defence" and "Food Fraud" prevention programs integrated into company self-monitoring plans and compliant with international GFSI standards. To support these activities, INALCA has introduced innovative technological solutions, such as the digitization of quality data using Power BI, thus improving integration, processing transparency and the effectiveness of operational decisions. During the reporting period, no serious problems or incidents attributable to human rights violations related to consumers were reported, confirming the effectiveness of the measures adopted. In the event of issues relating to products placed on the market, a specific "Product Withdrawal - Recall Procedure" is applied, ensuring rapid and comprehensive intervention. As required by EU legislation, in the event of potential risks to consumer health, this emergency procedure can be activated directly by the company, its customers, or the competent authorities. In the area of labelling and consumer communication, INALCA also adopts controls conducted by independent third-party bodies to ensure the accuracy, transparency and accessibility of product information. Since 2021, the company has initiated and maintained projects to consolidate its corporate food safety culture (CsA), as required by the main GFSI certification schemes, the *Codex Alimentarius* and European regulations. CsA is based on behaviours and values that all employees must adopt to ensure safe food production. For more details on the certification schemes adopted by Group companies, please see Appendix 2 on pages 152-153..



ESRS TOPIC	AREA OF INTERVENTION	SPECIFIC ACTION
ESRS S4 CONSUMERS AND END USERS	Customer and consumer food safety monitoring	263,000 analytical checks performed in 2024; Implementation of the HACCP model to identify and control critical risk points, ensuring traceability, laboratory testing, systematic audits, and compliance with international food safety standards; Implementation of IFS, ISO 17025, ISO 9001, and ISO 22005 certifications, as well as private standards for food safety management, product claims, and organic production;
	Nutrition and well-being through quality products	Presence of a Research and Development function dedicated to product innovation and the full satisfaction of customer and end-consumer needs.
	Opposition from consumers and activists	Ongoing and transparent dialogue with activists, NGOs, and stakeholders.
	Product non-compliance with food safety standards	Continuous training of its staff to protect consumer health and safety and prevent potential reputational damage resulting from the marketing of defective products; Promoting a corporate culture focused on responsibility and awareness of food safety, ensuring that procedures are properly implemented and that communication with customers, regulators, and institutions is transparent and timely;
	Creating new product lines.	Establishing a Research and Development department dedicated to product innovation and fully satisfying the needs of customers and end consumers.

**TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES**

INALCA adopts a structured and integrated approach in defining strategic objectives aimed at preventing negative impacts and strengthening positive effects along the entire value chain, with particular attention to protecting consumer health, food safety and end-customer satisfaction. **These aspects are currently managed through an organisational system that allows for consistent and coordinated planning, implementation, and monitoring of actions.** Corporate objectives are aimed at ensuring high hygiene and health standards and full compliance of food products through systematic analytical controls and self-monitoring inspections conducted at production facilities. These activities are complemented by training and awareness-raising initiatives for operational staff, aimed at increasing awareness and individual responsibility regarding food safety.

Performance against defined objectives is monitored periodically through the use of specific and measurable indicators, which are regularly analysed and shared with company management. This process allows not only to evaluate the effectiveness of the actions taken, but also to promptly identify any areas for improvement and development opportunities, strengthening the organisation's ability to proactively respond to emerging risks and consumer expectations.

ESRS TOPIC	OBJECTIVE	TARGET	BASELINE	BASELINE VALUE	STATE OF PROGRESS
ESRS S4 CONSUMERS AND END USERS	Improve product quality by strengthening laboratory analyses and controls along the entire production chain	Increase the quality and quantity of laboratory tests to ensure high standards of quality and food safety	2023	246,000 laboratory analyses performed.	263,000 laboratory analyses performed 100%
	Nutrition and well-being through quality products	Ensure constant improvement of the nutritional profile and offer a wide range of quality products capable of satisfying the diverse needs and preferences of consumers.	1963	Year of INALCA's foundation	Continuous improvement



**PRODUCT SAFETY AND RESPONSIBILITY**

- IFS - International Featured Standard (food)
- ISO 17025 General requirements for the competence of testing laboratories
- Private standards for food safety management developed by market-leading companies
- ISO 9001 - Quality management system
- Voluntary certifications for product claims - (meat from Italian farms, PDO, PGI)
- ISO 22005 - Traceability system in the food and feed supply chain
- Organic production certification



**ENVIRONMENTAL RESPONSIBILITY**

- ISO 14001 - Environmental Protection in Processes
- EPD - ENVIRONMENTAL PRODUCT DECLARATION RESPONSIBILITY



**SOCIAL RESPONSIBILITY**

- ISO 45001 - Occupational Health and Safety
- LEGISLATIVE DECREE 231/2001 - Corporate Administrative Liability
- Private Codes of Conduct - Adopted in the Supply Chain



**GOVERNANCE**  
INFORMATION

## ESRS G1 – Business Conduct

ESRS 2  
GOV-1

### THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND MANAGEMENT BODIES

The roles, responsibilities, and engagement of the administrative, management and control bodies have been comprehensively described in the general information section, in accordance with the **ESRS 2 GOV-1** standard. Therefore, please refer to this section (page 24) for a detailed description of the responsibilities and functions exercised by each body with regard to strategic oversight, the definition of ESG guidelines and policies, and the monitoring of the implementation and effectiveness of sustainability risk and opportunity management practices.

ESRS  
G1-1

### CORPORATE CULTURE AND BUSINESS CONDUCT POLICIES

As part of its Dual Relevance analysis and in accordance with the provisions of ESRS 1 AR16, key issues emerged, including **farm animal welfare**, both in terms of implemented practices and the potential excessive use of antibiotics, and the management of supplier relationships with regard to the implementation of any ESG purchasing policies.

**INALCA recognises animal welfare as an essential component of its corporate social responsibility and the overall sustainability of the agri-food supply chain.** In this perspective, the Company has developed and implemented dedicated policies aimed at ensuring compliance with the highest animal welfare standards throughout all stages of the production process, including transport, breeding and slaughter. These policies are based on the principles of transparency, traceability, compliance with applicable national and international regulations and are constantly updated to ensure alignment with industry best practices and evolving reference standards. INALCA is also committed to disseminating and sharing these principles with its stakeholders, promoting ongoing, open and constructive dialogue with suppliers, customers, competent authorities and civil society organisations. Through training programs, audits, and communication initiatives, the Company fosters the dissemination of a culture of respect and care for animals, thereby contributing to strengthening trust, transparency and collaboration along the entire value chain.

In line with this commitment, INALCA is increasingly concerned and sensitive to the monitoring and continuous improvement of animal welfare conditions on farms, both for consumers and stakeholders. For this reason, the Company has defined and implemented a structured set of principles, values, and operating rules aimed at monitoring and measuring animal welfare conditions on its farms. **The Company's approach is based on the guiding principle of the "Five Freedoms," which constitutes the reference criterion and the basis for all relevant corporate activities and procedures.**

The main parameters identified for assessing animal welfare include:



### "THE FIVE FREEDOMS"

#### FIRST FREEDOM

**Absence of hunger, thirst, and malnutrition**

From hunger, thirst, and malnutrition by ensuring the animal has access to fresh water and a diet that maintains its full health

#### SECOND FREEDOM

**To have an adequate physical environment**

providing the animal with an environment that includes shelter and a comfortable resting area

#### THIRD FREEDOM

**Absence of pain, injury and disease**

From pain, injury, and disease, preventing or diagnosing and treating them promptly.

#### FOURTH FREEDOM

**To manifest one's own behavioural characteristics**

To manifest one's own species-specific behavioural characteristics by providing the animal with sufficient space, appropriate facilities, and the company of animals of its own species.

#### FIFTH FREEDOM

**From fear and discomfort**

From fear and discomfort, ensuring the animal is provided with conditions and care that do not cause psychological suffering.

Based on these general guiding principles, INALCA has developed its own animal welfare techniques, drawing on a team of veterinarians committed to their updating, development, and monitoring throughout the entire supply chain: breeding, transport, and slaughter. This set of procedures and indicators constitutes a comprehensive, documented, accessible animal welfare management and evaluation system, which is shared with farmers through its website and on-site training and auditing activities, in coordination with agricultural associations (<https://www.inalca.it/it/qualita-e-sostenibilita/sostenibilita-sociale/benessere-animale/>). These are complemented by additional indicators defined as "objective," which are used to assess whether the breeding environment is suitable for ensuring full compliance with animal welfare conditions. **To this end, the main structural, technological, and managerial parameters characterising the breeding facility are taken into consideration.** The study of animal welfare aims not only to evaluate behaviour in relation to a more or less hospitable environment, but above all to understand how animals interpret and experience the environment in which they are raised, using objective criteria and evaluating all the different factors that can positively or negatively impact animal welfare (benefits and risks). The concept of welfare is the result of a healthy interaction between animal and environment and respect for the five freedoms; it is therefore the fruit of positive, fulfilling, and satisfying experiences capable of producing positive and effective adaptation responses in the animal. Animal welfare is also communicated to consumers through the voluntary system established by Regulation (EC) N° 1760/2000 on the labelling of beef and beef products, which ensures transparency, technical consistency, and independent control. For the assessment of animal welfare on farms, INALCA adopts the official standard promoted by the Ministry of Health and developed by the National Reference Centre for Animal Welfare (CReNBA), based at the Experimental Livestock Institute of Lombardy and Emilia Romagna, Brescia branch. Based on this standard, in 2020 INALCA published its own manual, **"The Good Breeder's Manual,"** for the assessment of animal welfare in the meat sector. This manual is adopted throughout its supply chain and has now been translated into English. The Manual is subject to periodic revisions and technical updates.

Another area of intervention concerns the adoption of advanced techniques for the protection and respect of animal welfare, assessed according to the national standard SQNBA (National Quality System for Animal Welfare), developed by the Ministry of Health in conjunction with the Ministry of Agriculture, Food Sovereignty and Forestry (MASAF). **This approach allows for optimal monitoring of animal health and contributes to reducing mortality and morbidity rates, while promoting the widespread application of good veterinary practices, particularly regarding drug management and the appropriate use of prophylactic vaccinations.** Aware of the growing need for information, especially regarding supply chains not directly controlled by the Group, INALCA has long been diligent in promoting recognised schemes compliant with best practices in the field of sustainability and agricultural regulations. Among these, the latest is the SQNZ (National Livestock Quality System) specification, governed by Ministerial Decree 16/12/2022, within the



**3 GOOD HEALTH AND WELL-BEING**

To assess animal welfare on farms, INALCA adopts the official standard promoted by the Ministry of Health and developed by the National Reference Centre for Animal Welfare (CReNBA), based at the Brescia branch of the Experimental Livestock Institute of Lombardy and Emilia Romagna. [//www.classyfarm.it/](http://www.classyfarm.it/). In 2022, INALCA launched a blockchain-based system aimed at tracking drug use on farms and supporting the digital transition of agricultural and livestock activities in the beef sector. In 2023, the project focused on the farms of the subsidiaries Società Agricola

Corticella (veal and heifer), Cremovit, and La Torre, leading to the full implementation of the blockchain platform in 2024. The system is now fully operational and allows for timely and transparent monitoring of drug use throughout the livestock supply chain. The platform will be progressively updated and enhanced with new features and analysis tools, with the aim of further improving process efficiency, data quality, and traceability, thus consolidating the Group's digital innovation and sustainability journey.



broader context of the relevant EU legislation consisting of Regulations (EU) 2021/2115 and Delegated Regulation (EU) 2022/126. This specification, which has a specific focus on environmental sustainability, includes aspects relating to agricultural practices for the optimal management of manure, the adoption of production models inspired by the principles of the circular economy, the production of energy from renewable sources, as well as the use of precision agriculture and livestock farming techniques (PLF). The specification, soon to be adopted for the veal and heifer supply chains, also aims to apply INALCA's experience in sustainability to the milk supply chain through an innovative and integrated approach. If approved at the national level, this tool would allow farmers to access European funds linked to the Common Agricultural Policy (CAP) and benefit from transparent forms of communication with consumers regarding their farming practices.

Responsible antibiotic management is a strategic element for protecting animal and human health, as well as promoting welfare on farms and is one of the cornerstones of INALCA's sustainability practices. Antibiotics are essential medicines for both human and animal health and their correct use is a fundamental element for the care and welfare of farm animals. **Antimicrobial resistance (AMR)** is a natural phenomenon linked to the adaptation of certain microorganisms. Following genetic mutations or the acquisition of resistance genes from other microorganisms, these microorganisms acquire the ability to survive and multiply in the presence of antimicrobial agents. This phenomenon has reached worrying proportions in recent years, largely due to the uncontrolled use of antibiotics in humans, pets and livestock, posing a significant threat to public and animal health. **To combat the spread of antimicrobial resistance, the Group has developed a series of guidelines applicable to all operational levels and all geographical areas in which it operates.** Among these, a central role is played by the dissemination of correct drug use practices, coupled with the **adoption of agricultural methods aimed at quantitatively reducing the use of antibiotics**, with particular attention to livestock categories considered critically important for human medicine according to the **World Health Organisation (WHO)**. The INALCA Group requires that antibiotics and medications be used exclusively according to the specific instructions provided by the pharmaceutical company, **purchased only with a veterinary prescription, used following the quantities and times prescribed in the package insert.** Any other use must be authorised by the company veterinarian. Along with adopting technical regulations and controls, the Company promotes the transfer of scientific knowledge to livestock farms, highlighting cases of excellence and testimonials from model farms that have successfully implemented responsible drug management. INALCA also recognises the importance of collaborating with institutions committed to finding **alternative solutions to the use of antibiotics**. Thanks to its experience in the sector, INALCA has created production chains that guarantee the absence of antibiotic use from weaning to the final fattening stages. This achievement is made possible by ongoing efforts to implement good drug use practices, strengthen company management skills, and maintain high standards of welfare and biosecurity on livestock farms. At the same time, the Company has promoted the introduction of the role of **Company Veterinarian** at supplier farms, in order to raise the overall level of health and safety.

### ANIMAL WELFARE POLICIES AND CODES OF CONDUCT

- ▶ Good Farming Practices
- ▶ Animal welfare during transport
- ▶ Animal welfare in slaughterhouses
- ▶ Conscious use of medicines
- ▶ Animal welfare monitoring from breeding to slaughter

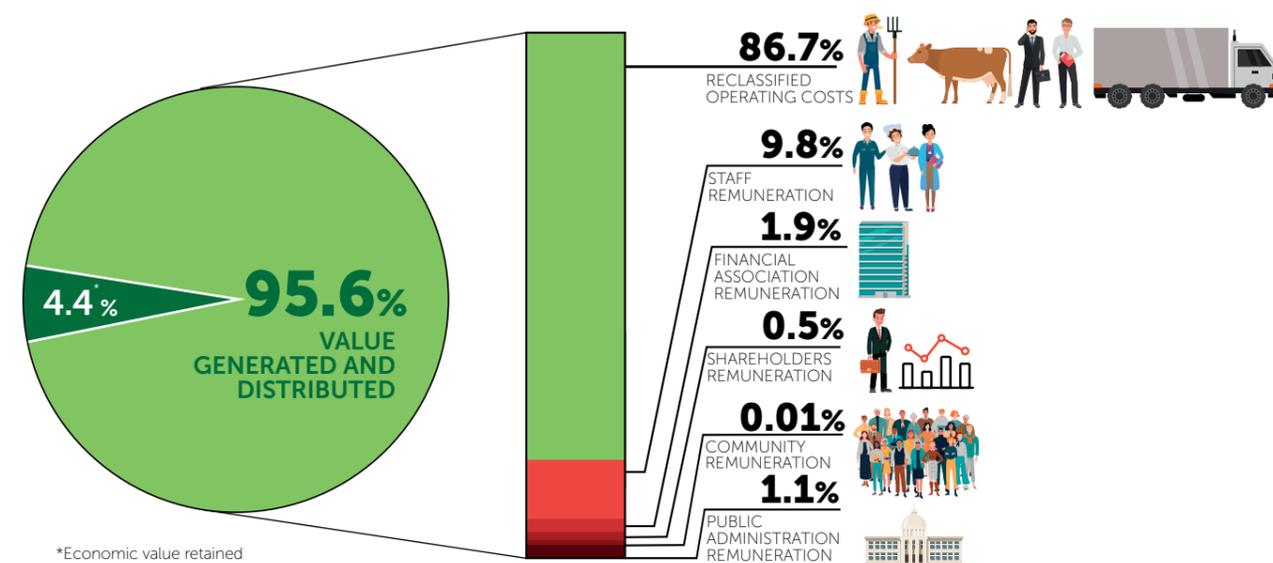


ESRS G1-2

### MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

The INALCA Group considers it of strategic importance to maintain collaborative, transparent, and long-lasting relationships with its **suppliers**, recognising that the solidity, quality and sustainability of the supply chain directly impact not only product quality but also the company's ability to operate responsibly and consistently with its corporate values. Aware of the potential risks associated with the supply chain - which may involve environmental, social, ethical and reputational issues - the company has adopted a structured and systematic management model that integrates rigorous criteria for the selection, evaluation and qualification of suppliers, in accordance with the Quality Management System procedures and in line with the international standards ISO 9001 and GFSI. **All suppliers are required to sign the company's Code of Ethics**, which, together with the **Code of Conduct**, defines clear and binding standards regarding human rights, fair working conditions, health and safety in the workplace, as well as the promotion of respectful, inclusive and non-discriminatory work environments. Furthermore, business partners are required to adopt environmentally responsible behaviour, minimise the impact of their activities, comply with applicable regulations, and observe the principles of fairness and commercial transparency. Through this integrated and preventative approach, INALCA aims to strengthen the resilience, reliability, and transparency of its supplier network, while promoting a widespread culture of sustainability and responsibility throughout the entire supply chain, also thanks to the **value generated and distributed** through its activities. The company conducts periodic audits, structured assessments, and awareness-raising initiatives to ensure that suppliers share the same values and are actively committed to continuously improving their environmental,

### ECONOMIC VALUE GENERATED AND DISTRIBUTED 2024



social, and ethical performance. This commitment fosters the dissemination of ethical, sustainable, and responsible business practices, contributing to the creation of shared value for all stakeholders, while also strengthening the Group's reputation and the trust of its partners and consumers.

**Economic Value Generated and Distributed (EVG&D)** is the key indicator used to measure the company's overall contribution to its stakeholders. In the beef sector, characterised by low added value in production processes and a high proportion of raw materials and personnel costs, the **share of value transferred externally is particularly significant. In this context**, INALCA's operations are distinguished by a high degree of **economic sustainability**, as the share of value distributed to stakeholders is considerable. As shown in the graph, in 2024, the economic value directly generated by the Group reached **95.6%**, confirming that the beef supply chain is among those that transfer the most value externally, also due to the high proportion of agricultural raw materials. During the financial year, the economic value generated by the INALCA Group remained in line with the previous year, and the value distributed to farmers, staff, suppliers, public administration, and financial system operators remained stable.



# ANNEX 1

## CORPORATE STRUCTURE OF INALCA GROUP

	COMPANY NAME	REGISTERED OFFICE	NUMBER OF OFFICES
ITALY	INALCA INDUSTRIA ALIMENTARE CARNI S.p.A.	Via Spilamberto, 30/C - Castelvetro di Modena (MO)	6
	ITALIA ALIMENTARI S.p.A.	Via Europa, 14 - Busseto (PR)	5
	GES.CAR S.r.l.*	Via Spilamberto, 30/C - Castelvetro di Modena (MO)	8
	FIORANI & C. S.r.l.	Via Federico Coppelati, 52, 29122 Piacenza (PC)	3
	TECNO-STAR DUE S.r.l.	Via dei Marmorari, 88 - Spilamberto (MO)	1
	SOCIETA' AGRICOLA CORTICELLA S.r.l.	Via Corticella, 15 - Spilamberto (MO)	5
	GUARDAMIGLIO S.r.l.	Via Coppelati, 52 - Piacenza (PC)	1
	MONTAGNA S.p.A.	C.DA TOSCANO IOELE - 87064 - CORIGLIANO-ROSSANO (CS)	1
	INALCA FOOD & BEVERAGE S.r.l. (ITALIA)	Via Modena, 53 - Castelnuovo Rangone (MO)	1
	CREMOVIT S.r.l.	Via Spilamberto, 30/C - Castelvetro di Modena (MO)	1
	CASTELFRIGO LV S.r.l.	Via Salvador Allende, 6 - Castelnuovo Rangone (MO)	1
	REALBEEF S.r.l.	Località Tierzi, Zona Asi - Flumeri (AV)	1
	PARMA SERV S.r.l.	V. I. Mari - Pontetaro, 6 - Noceto (PR)	1
	INA TEN S.r.l.	Via Spilamberto, 30/C - Castelvetro di Modena (MO)	1
	DOLFEN S.r.l.	Via Zarotto, 86 - Parma (PR)	1
	MACELLO DI PARMA S.r.l.	Str. del Taglio, 6 - Parma (PR)	1
	UNITEA S.r.l.	Via Taliercio, 3 - Mantova (MN)	1
	LA TORRE SOC.AGR. CONSORTILE A R.L.	Via Crosoncino 4, - 37063 Isola Della Scala, (VR)	1
	TECNOVIT S.r.l.	Strada Boccalina, 1 - 46048 Roverbella (MN)	1
	BEST ITALIAN MEAT	Contrada Sant'Angelo - 72015 Fasano (BR)	1
SOCIETÀ AGRICOLA LA MARCHESINA S.r.l.	Cascina cittadina - 20088 Rosate (MI)	1	
EUROPEAN UNION	INALCA POLAND	Henryka Sienkiewicza 74, 09-110 Sochocin	1
	AGRO-INWEST AG sp z.o.o.	Baszków 123, 63-760 Zduny	8
	PARMA FRANCE S.a.s.	13, Rue Claude Chappe-Le Parc de Crecy 69370 - St Didier Au Mont D'Or	1
	COMIT COMERCIAL ITALIANA DE ALIMENTACION S.L.	Camino Real de la Orotava, 215, El Hortigal La Laguna Snata Cruz de Tenerife - Spagna	1
	TECALI S.L.	Camino Real de la Oratava 215, El Ortiga - La Laguna Tenerife	1
	HOSTERIA BUTTARELLI S.L.	Calle Herraaje s/n Neve 29, Sector P3 Norte Poligono industrial de Arinaga 31119 Aiguimes Las Palmas Spagna	1
	MILLE SAPORI PLUS sp.z.o.o.	ul. Gierdziewskiego, 7, 02-495 Warszawa POLAND	1
	MSP TRANSPORT sp. Z.o.o.	Kazimierza Gierdziewskiego 7	1

	COMPANY NAME	REGISTERED OFFICE	NUMBER OF OFFICES
AFRICA	INALCA ANGOLA LIMITADA	Lda Rua Dom Manuel Nunes Gabriel s/n°, Bairro Palanca, Município do Xilamaba Kiaxi, Luanda	1
	INTER INALCA (ANGOLA) COMERCIO GERAL, LIMITADA	Lda Rua Dom Manuel Nunes Gabriel s/n°, Bairro Palanca, Município do Xilamaba Kiaxi, Luanda	1
	CI SARL DISTRIBUTEUR DE PRODUITS ALIMENTAIRES EN CÔTE D'IVOIRE (DISPAL)	Bld Carde - 3ème étage Immeuble Les Harmonies 04 B.P. 225 Abidjan 04	1
	INALCA BRAZZAVILLE SARLU	Avenue Cote Mondaine BP8410 Pointe Noire	1
	INALCA ALGERIE S.a.r.l.	08, Rue Chérif Hamani 16000 Algeri	1
	INDUSTRIA ALIMENTAIRES CARNES DE MOCAMBIQUE	Av. De Mocambique n. 9400 km 9,5 Bairro do Zimpeto Maputo	1
	INALCA KINSHASA SPRL	Avenue Poids Lourds n. 935 Ndolo-Commune Gombe Kinshasa	1
	INALCA F&B CABO VERDE LDA	Cidade de Santa Maria Ilha do Sal, Rua Amilcar Cabral 1° Andar do Predio Argos Cabo Verde	1
AMERICA	ITALIA ALIMENTARI CANADA LTD	Brampton, Ontario - Canada 116, Nuggett Court	1
	LLC TPF KASKAD	Vostochnaia,5 143000 Odintzovo, Mosca	1
ASIA	OOO ORENBEEF	UL Pionerskaya, 2 Campagna Cherniy Otrog, Saraktashkiy Reg. 462100	1
	MARR RUSSIA LLC	UL Vostochnaia, 5 143000 Odintzovo, Mosca	1
	TOO INALCA FOOD SERVICE KAZAKISTAN	Bekmakhanova street, 96/2 - Almaty - Republic of Kazakhstan	1
	AGROSAKMARA LLC	Dorozhnaya str.50, Cherniy Otrog - Orenburg - Russia	1
	AGROSAKMARA BASHKIRIA LLC	Via Admiral Makarov,26 (b. 2, office 16) Ufa, Republic of Bashkortostan	1
	BRIGHT VIEW TRADING HK LTD	Chai Wan, Wah Shing Centre, 5 Fung Yip Street, Hong Kong	1
	TOP BEST INTERNATIONAL HOLDING LTD	Room 701, Blok 2, 7/F Golden Industrial Building, 16-26 Kwai Tak Street, Kwai Fong, N.T., Hong Kong	1
	INALCA F&B SDN BHD (MALAYSIA)	151B, Jalan Batu Tiga Lama, Taman Rashna, 41300 Klang, Selangor Malaysia.	1
	THE HOUSE OF FINE FOODS (MACAU)	Largo de Pac On 88-88D, Lightex, Bloco A, 5º andar, Unidade A&B, Macao	1
	THE HOUSE OF FINE FOODS (HK)	Unit 303, Oceanic Industrial Centre, 2 Lee Lok St, Ap Lei Chau, Hong Kong	1
<b>TOTAL NUMBER OF LOCATIONS</b>			<b>62</b>

\* Please note that GESCAR S.r.l., a service provider acting on behalf of INALCA, does not have its own physical premises. The number indicated refers exclusively to the premises where GESCAR staff operate, which are already included in this list. Therefore, the total number of premises does not include any additional units attributable to GESCAR.

# ANNEX 2

## INALCA GROUP CERTIFICATIONS AND MANAGEMENT SYSTEMS

CERTIFICATION HISTORY		ITALY															ABROAD					
		INALCA S.P.A.						MONTAGNA S.p.A.	FIORANI & C		FIORANI & C		ITALIA ALIMENTARI				CASTELFRIGO	REALBEEF	RUSSIA		POLONIA	AFRICA
		Ospedaletto Lodigiano	Castelvetro	Rieti	Capo d'Orlando	Reggio Emilia	Pegognaga	Rossano	"Castelvetro (Solignano)"	Castelnuovo	Piacenza	Postalesio	Gazoldo degli Ippoliti	Busseto	Mandatoriccio			MARR	INALCA	INALCA POLAND	INALCA ANGOLA	
Technical Standard	Title															Odintsovo (MARR)	Orenburg (ORENBEEF)	Sochocin				
IFS	International Food Standard	●	●	●	●		●	●	●	●	●	●	●	●	●	●						
BRC	British Retail Consortium										●	●	●	●	●							
ISO/IEC 17025	General requirements for the competence of testing laboratories		●																●			
FSSC 22000	Food safety management systems																			●		
ISO 22005	Traceability system in agri-food supply chains	●	●									●	●		●	●						
Private standards	Food safety management systems developed by market-leading companies	●	●	●			●					●	●		●	●	●	●				
UNI EN ISO 9001	Quality management system	●	●	●			●								●					●		
Voluntary certification	Product claims (Meat from Italian farms, Product certification, PDO, PGI, AIC, HALAL)	●	●	●			●			●	●	●	●	●	●				●			
Biologico Organico	Organic production certification	●	●			●	●	●		●		●										
ISO 14001	Environmental Management Systems	●	●	●			●				●	●			●			●		●		
EPD®	Environmental Product Declaration		●	●																		
ISO 45001 Occupational Health and Safety Management	Health and Safety of Workers	●	●	●	●	●	●		●	●	●						●	●		●		
Sedex Members Ethical Trade Audit (SMETA) 4 Pillars	Health and Safety of Workers		●																			

# ANNEX 3

## ESRS 2 IRO-2 - DISCLOSURE OBLIGATIONS OF ESRS SUBJECT TO THE CORPORATE SUSTAINABILITY STATEMENT

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# ANNEX 4

## TABLE WITH REFERENCE TO OTHER EU LEGISLATIVE ACTS

The following table is provided, as required by Appendix B of the ESRS. 2, to facilitate the search for information elements contained in this Sustainability Statement from other EU legislative acts.

TOPIC - ESRS	DISCLOSURE REQUIREMENT AND CORRESPONDING INFORMATION ELEMENT	PAGE
ESRS 2 GOV-1	Gender diversity on the board, paragraph 21, letter d)	24
ESRS 2 GOV-1	Percentage of independent board members, paragraph 21, letter e)	24
ESRS 2 GOV-4	Statement on due diligence, paragraph 30	28
ESRS 2 SBM-1	Involvement in activities related to fossil fuel activities, paragraph 40, letter d), point I)	Not applicable
ESRS 2 SBM-1	Involvement in activities related to the production of chemicals, paragraph 40, letter d), point II)	Not applicable
ESRS 2 SBM-1	Participation in activities related to controversial weapons, paragraph 40, letter d), point III)	Not applicable
ESRS 2 SBM-1	Involvement in activities related to the cultivation and production of tobacco, paragraph 40, letter d), point IV)	Not applicable
ESRS E1-1	Transition plan to achieve climate neutrality by 2050, paragraph 14	66
ESRS E1-1	Companies excluded from benchmarks aligned with the Paris Agreement, paragraph 16 letter g)	66
ESRS E1-4	GHG emission reduction targets, paragraph 34	76
ESRS E1-5	Fossil fuel energy consumption disaggregated by source (only sectors with high climate impact), paragraph 38	77
ESRS E1-5	Energy consumption and energy mix, paragraph 37	77
ESRS E1-5	Energy intensity associated with activities in sectors with high climate impact, paragraphs 40 to 43	77
ESRS E1-6	Gross emissions from scopes 1, 2, 3 and total GHG emissions, paragraph 44	78
ESRS E1-6	Intensity of gross GHG emissions, paragraphs 53 to 55	78
ESRS E1-7	GHG removals and carbon credits, paragraph 56	Not relevant
ESRS E1-9	Exposure of the portfolio from the benchmark index to physical climate risks, paragraph 66	Disclosure subject to phase-in
ESRS E1-9	Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66(a) ESRS E1-9 Location of significant assets at significant physical risk, paragraph 66, letter c)	Disclosure subject to phase-in
ESRS E1-9	Breakdown of the book value of its real estate assets by energy efficiency class, paragraph 67, letter c)	Disclosure subject to phase-in
ESRS E1-9	Degree of exposure of the portfolio to climate-related opportunities, paragraph 69	Disclosure subject to phase-in
ESRS E2-4	Quantities of carbon pollutants listed in Annex II to the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted into the air, water and soil, paragraph 28	87
ESRS E3-1	Water and marine resources, paragraph 9	88
ESRS E3-1	Dedicated policy, paragraph 13	88
ESRS E3-1	Sustainability of oceans and seas, paragraph 14	88
ESRS E3-4	Total water recycled and reused, paragraph 28, letter c)	Not relevant
ESRS E3-4	Total water consumption in m <sup>3</sup> relative to net revenues from own operations, paragraph 29	91
ESRS 2 IRO-1- E4	paragraph 16, letter a), point I)	Not applicable
ESRS 2 IRO-1- E4	paragraph 16, letter b)	Not applicable
ESRS 2 IRO-1- E4	paragraph 16, letter c)	Not applicable
ESRS E4-2	Sustainable agricultural/land use policies or practices, paragraph 24, letter b)	93
ESRS E4-2	Policies or practices for sustainable use of the sea/oceans, paragraph 24, letter c)	Not applicable
ESRS E4-2	Policies to tackle deforestation, paragraph 24, letter d)	93
ESRS E5-5	Non-recycled waste, paragraph 37, letter d)	102
ESRS E5-5	Hazardous waste and radioactive waste, paragraph 39	102
ESRS 2 SBM2- S1	Forced labour risk, paragraph 14, letter f)	106
ESRS 2 SBM2- S1	Child labour risk, paragraph 14, letter g)	106
ESRS S1-1	Human rights policy commitments, paragraph 20	108
ESRS S1-1	Due diligence policies on issues covered by International Labour Organisation core conventions 1 to 8, paragraph 21	108
ESRS S1-1	Procedures or measures to prevent human trafficking, paragraph 22	108
ESRS S1-1	Policy on prevention or management system for occupational accidents, paragraph 23	108
ESRS S1-3	Complaints/grievance handling mechanisms, paragraph 32, letter c)	111
ESRS S1-14	Number of fatalities and number and rate of work-related injuries, paragraph 88, letter b) and c)	120
ESRS S1-14	Number of days lost due to injury, accident, fatal accident or illness, paragraph 88, letter d)	120
ESRS S1-16	Gender pay gap not corrected, paragraph 97, letter a)	Not applicable

TOPIC - ESRS	DISCLOSURE REQUIREMENT AND CORRESPONDING INFORMATION ELEMENT	PAGE
ESRS S1-16	Excessive pay gap in favour of the chief executive officer, paragraph 97, letter b)	Not applicable
ESRS S1-17	Incidents related to discrimination, paragraph 103, letter a)	122
ESRS S1-17	Failure to comply with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 104, letter a)	122
ESRS 2 SBM-3 S2	Serious risk of child labour or forced labour in the supply chain, paragraph 15, letter b)	123
ESRS S2-1	Human rights policy commitments, paragraph 17	124
ESRS S2-1	Policies related to workers in the value chain, paragraph 18	124
ESRS S2-1	Failure to comply with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 19	124
ESRS S2-1	Policies on due diligence on issues covered by the International Labour Organisation's fundamental conventions 1 to 8, paragraph 19	124
ESRS S2-4	Human rights issues and incidents in its upstream and downstream value chain, paragraph 36	126
ESRS S3-1	Human rights policy commitments, paragraph 16	129
ESRS S3-1	Non-compliance with the UN Guiding Principles on Business and Human Rights, ILO principles or OECD guidelines, paragraph 17	129
ESRS S3-4	Human rights issues and incidents, paragraph 36	130
ESRS S4-1	Consumer and end-user policies, paragraph 16	136
ESRS S4-1	Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 17	Not applicable
ESRS S4-4	Human rights issues and incidents, paragraph 35	138
ESRS G1-1	United Nations Convention against Corruption, paragraph 10, letter b)	Not applicable
ESRS G1-1	Protection of Whistleblowers, paragraph 10, letter d)	Not applicable
ESRS G1-4	Fines imposed for violations of laws against active and passive corruption, paragraph 24, letter a)	Not applicable
ESRS G1-4	Rules for combating active and passive corruption, paragraph 24, letter b)	Not applicable

# ANNEX 5

## MDR-P - POLICIES ADOPTED FOR RELEVANT SUSTAINABILITY ISSUES

ESRS TOPIC	Politics	Main Contents	Scope of Implementation of the Policy	Highest Management Level Responsible	How Policy Is Disseminated
ESRS E1 - Climate Change	INALCA Code of Conduct for Sustainable Business Development (supported by the ISO 4001 Environmental Management System)	The Code outlines the guiding principles of environmental, social, and governance sustainability, promoting energy efficiency, pollution prevention, responsible resource management and the circular economy. While there is no specific climate change policy, the document reflects the company's commitment to identifying and managing climate-related risks and opportunities.	All companies with a manufacturing presence, employees, collaborators, and third parties operating under the control of the organisation.	Chief Executive Officer	Communicated via internal networks and management systems, as well as made public on the Group's website.
ESRS E2 - Pollution	INALCA Code of Conduct for Sustainable Business Development (supported by the ISO 14001 Environmental Management System)	The ISO 14001 Code of Conduct and Environmental Management System guide pollution prevention and continuous improvement of environmental performance through monitoring, operational control and responsible resource management. For the livestock sector, specific best practices are adopted to reduce soil and water contamination and promote sustainable practices throughout the supply chain.	All production sites (ISO 14001 certified and non-certified), directly affected livestock farms (bullocks, heifer, white veal), collaborators, and third parties involved in the value chain.	Chief Executive Officer	Communicated via internal networks and management systems, as well as made public on the Group's website.  Procedures are shared with farmers and other supply chain partners.
ESRS E3 - Water and Marine Resources	INALCA Code of Conduct for sustainable business development (supported by ISO 14001 Environmental Management System)	The Code, implemented through the ISO 14001 Environmental Management System, governs the sustainable management of the water cycle, from procurement to disposal, with control, monitoring, and continuous improvement activities to reduce environmental impacts and ensure responsible use of water resources.	All production sites, both ISO 14001 certified and non-certified, apply uniform water management principles and procedures.	Chief Executive Officer	Spread through environmental management systems, internal documentation, operational procedures, and employee training.
ESRS E4 - Biodiversity and Ecosystem Protection	INALCA Group Deforestation Commitment	Although there is no specific policy dedicated to biodiversity, the Group applies responsible natural resource management practices and prevents environmental impacts along the supply chain. The INALCA Group Deforestation Commitment document defines commitments to prevent deforestation in the supply chain and protect ecosystems associated with the raw materials it sources, in compliance with Regulation (EU) 2023/1115.	Implementation of the Policy includes operations along the entire value chain.	Chief Executive Officer	Communicated through company documentation, management systems and dissemination to the supply chain partners involved.
ESRS E5 - Resource Use and the Circular Economy	INALCA Code of Conduct for Sustainable Business Development (supported by the ISO 14001 Environmental Management System)	The Code promotes the efficient use of resources, waste prevention and the adoption of circular production models, promoting recycling, reuse and the reduction of raw materials and energy consumption. This approach is complemented by the ISO 14001 Environmental Management System, which defines procedures, controls, and objectives to continuously improve environmental performance and support the transition to a more sustainable production model.	All Group production companies, employees, collaborators and third parties are subject to control of the organisation, including ISO 14001 certified and non-certified sites.	Chief Executive Officer	Communicated via internal network and management systems, as well as made public on the Group's website
ESRS S1 - Own workforce	INALCA Code of Ethics; Whistleblowing Reporting System; Organisational Model pursuant to Legislative Decree 231/2001; Health and Safety Management Systems ISO 45001; UN-ILO-OECD Principles;	Corporate policies and documents define the Group's ethical principles, human rights, and social responsibilities. The Code of Ethics prohibits forced labour, child labour, human trafficking, and any form of discrimination, requiring signature by employees, contractors and suppliers. The Whistleblowing System allows for anonymous reporting of violations. Model 231 focuses on responsibility, controls, training and auditing to prevent incidents and identify risks and impacts on health and safety; the ISO 45001 standard ensures a structured approach to worker protection. The company promotes inclusion, diversity, well-being, trade union dialogue, freedom of association and fair working conditions (CCNL). Internal audits are planned, also in accordance with the standard.	All employees and collaborators of the INALCA Group.	Board of Directors  Supervisory Body	Delivery of the Code of Ethics upon hiring; Publication on the company portal and website;  Training, internal procedures, and audits;  Union meetings and internal communications.
ESRS S2 - Workers along the value chain	INALCA Code of Ethics; Code of Business Conduct for partners and suppliers	Internal audits are foreseen, also according to the standard The Code of Ethics and the Code of Business Conduct establish binding principles for all the Group's stakeholders: respect for human rights, decent working conditions, environmental protection, integrity and transparency. Internal code prohibits forced labour, child labour and discrimination, promotes freedom of association, collective bargaining, equal treatment and safety at work.	All suppliers, business partners and supply chain stakeholders.	Board of Directors	Code of Ethics and Code of Business Conduct published on the company website;  Sharing and requesting signature from commercial partners as a contractual document
ESRS S3 - Stakeholder communities	INALCA Code of Ethics; Code of Business Conduct for Partners and Suppliers;	Currently, INALCA has not formalised policies relating to the stakeholder communities.			
ESRS S4 - Consumers and end users	Quality, Safety, Environment and Social Responsibility Policy	The Quality, Safety, Environment and Social Responsibility Policy defines the Group's commitment to ensuring safe, compliant and traceable products throughout the supply chain. The company applies advanced control systems and HACCP plans, promotes a culture of quality through continuous training and audits, and ensures consumer protection through transparency, legality and responsible process management. Particular attention is paid to food safety, continuous improvement and compliance with national and international industry standards.	All clients and end consumers of the INALCA Group.	Chief Executive Officer	Communicated via internal networks and management systems, as well as made public on the Group's website.
ESRS G1 - Business conduct	Code of Business Conduct for partners and suppliers;  Animal welfare Policies and Guidelines;	The Code of Ethics and the Code of Business Conduct establish binding principles for all the Group's stakeholders: respect for human rights, decent working conditions, environmental protection, integrity, and transparency.  Both codes prohibit forced labour, child labour, exploitation and discrimination, promote freedom of association, collective bargaining, equal treatment and workplace safety.  The company policy recognises animal welfare as a central element of corporate social responsibility and supply chain sustainability. INALCA adopts high standards at all stages of the cycle (breeding, transport, slaughter), based on the Five Freedoms, objective indicators and the CReNBA standard. Practices are shared with farmers through manuals, training and dedicated audits, ensuring transparency, traceability and continuous improvement. The company also promotes active dialogue with stakeholders and suppliers to spread a culture of respect, care and compliance with ethical standards.	The recipients of the policy are the corporate bodies, employees, collaborators, customers, and suppliers operating in Italy and abroad, whether directly or indirectly, on a permanent or temporary basis, as well as institutions that have dealings and relationships with the Company, each in accordance with their respective roles and responsibilities.	Chief Executive Officer  Board of Director	The policy is made public on the Group's website.

# ANNEX 6

## MDR-A - ACTION AND RESOURCES ON RELEVANT SUSTAINABILITY ISSUES

ESRS TOPIC	Action	Scope of Implementation	Time horizon	State of Progress
ESRS E1 - Climate change	Installation of 23 photovoltaic systems for a total of 19.38 MWp by 2026	Own operations	Medium	Current and planned
	7 anaerobic digestion (biogas) plants powered by industrial and agricultural waste - total capacity 5.12 MW	Own operations	Medium	Current
	2 cogeneration plants powered by rendered animal fats - total capacity 4.8 MW	Own operations	Medium	Current
	5 trigeneration engines powered by natural gas - total capacity 16.6 MW	Own operations	Medium	Current
	2 cogeneration engines in Italy and Poland - additional power	Own operations	Medium	Current
	Biogas and cogeneration integration to reduce the use of fossil fuels	Own operations	Medium	Current
	Over 80% of transport operations carried out with Euro 5/Euro 6 vehicles	Downstream	Brief	Current
	Increase in methane-powered vehicles in 2023 and 2024	Downstream	Brief	Current
	Promotion of the use of HVO in diesel company vehicles	Own operations	Brief	Current
	GREEN GO! project and PSCL at the Rieti site via the Wecity platform	Own operations	Brief	Current
	Extension of post-sale transport reporting (Scope 3)	Downstream	Brief	Planned
	Anaerobic digestion, coverage of storage sites, immediate landfill	Upstream	Medium/Long	Planned
	Trial of Silvafeed® BX and Anavrin® for the reduction of enteric methane	Upstream	Long	Planned
Studies on enteric fermentation in beef bovine (bullocks, heifers, and white veal calves).	Upstream	Medium/Long	Planned	
ESRS E2 - Pollution	Periodic reporting within the Environmental Review (prepared annually in line with ISO 14001).	Own operations	Brief	Current
	Reporting process also adopted at INALCA Group sites and companies not yet formally certified.	Own operations	Medium/Long	Planned
ESRS E3 - Water and marine resources	Direct and integrated management of over 90% of the water cycle at INALCA production sites, including groundwater supply, wastewater use, treatment, and purification.	Own operations	Brief	Current
	Continuous monitoring of the company's water network to identify leaks and optimise water efficiency.	Own operations	Brief	Current
ESRS E4 - Protection of biodiversity and ecosystems	Implementation of a due diligence system to prevent deforestation, including product mapping and adoption of a digital platform for managing Due Diligence Declarations (DDS).	Upstream, Own operations e Downstream	Medium	Current
	Project with Coldiretti for livestock repopulation in southern Italy, based on the 'cow-calf' model and mixed farming (grazing/protected facilities), aimed at promoting local agriculture and encouraging biodiversity in cattle breeds.	Upstream	Medium/Long	Current
	Progressive use of FSC®-certified packaging materials to guarantee their origin from responsibly managed forests, protecting biodiversity and forest ecosystems.	Own operations	Brief	Current and planned
ESRS E5 - Resource Use and Circular Economy	Investments in technologies for the reuse and valorisation of by-products from slaughter and processing processes, destined for the food, agricultural, animal feed, pharmaceutical, and cosmetics sectors.	Own operations	Medium/Long	Current and planned
	Adoption of recyclable materials in the main production plants, resulting in savings in sanitising virgin raw materials. Replacement of non-recyclable solutions with certified packaging for foreign markets. Introduction of circular economy practices also in secondary packaging, with the use of reusable materials to reduce resource consumption.	Own operations	Medium	Current and planned
ESRS S1 - Own workforce	Periodic monitoring of compensation policies and the relevant national collective bargaining agreement (CCNL) to ensure a decent standard of living for all Group employees.	Own operations	Brief	Current
	Training program that includes entry-level courses, followed by job-specific training through the use, where appropriate, of a dedicated e-learning platform, to ensure ongoing professional development. Launch of the INALCA Butchers Academy at the INALCA Poland site, scheduled for 2025.	Own operations	Brief	Current and planned
	SA comprehensive and updated health surveillance system, preventive and periodic medical examinations to assess suitability for duties, health protocols defined by the company physician, monitoring in the event of job changes or returns from absences, risk mapping and worker suitability.	Own operations	Brief	Current
	Adoption of ISO 45001 certified management system in various Group locations.	Own operations	Medium	Current
	Implementation of specific Risk Assessment Documents (DVR).	Own operations	Medium	Current
	Italian language courses for foreign employees, promotion of equal opportunities in access to healthcare information and services. Promotion of an inclusive work environment through dedicated training and personal support for employees. Initiatives such as supplemental healthcare and the opening of bank accounts in developing countries where the Group operates.	Own operations	Brief	Current
	Anonymous reporting system via a dedicated online portal.	Own operations	Brief	Current
	Periodic reviews of the integrated Quality, Environment, Health and Safety management system, definition of health protocols based on risk assessment, prevention and control of the use of chemicals in high-risk roles.	Own operations	Brief	Current
Measures in line with the clear legislation on personal data protection: training courses on confidentiality and correct use of information, adoption of good practices for data protection, management of health information in compliance with professional secrecy.	Own operations	Brief	Current	

ESRS TOPIC	Action	Scope of Implementation	Time horizon	State of Progress
ESRS S2 - Workers along the value chain	Raising awareness among suppliers and customers regarding the need to ensure a level of income or wage sufficient to ensure a decent standard of living for all family members of workers in the Group's value chain, through the adoption of a Code of Ethics and Business Conduct.	Upstream e Downstream	Brief	Current
	Improving the skills of workers in INALCA's value chain by raising awareness among suppliers and customers regarding the implementation of training and professional development activities.	Upstream, Own operations and Downstream	Brief	Current
	Adoption of ISO 45001 certification at some of the Group's locations; extension of the best practices established in health and safety management systems to all workers along the value chain.	Upstream, Own operations and Downstream	Medium	Current and planned
	Continuous monitoring of working conditions; periodic supplier audits; adoption and enforcement of the Code of Ethics and Business Conduct; option to report non-compliance anonymously via a dedicated portal.	Upstream	Brief	Current
	Adoption and enforcement of the Code of Ethics and Business Conduct; periodic audits and controls to ensure compliance; option to report non-compliance anonymously via a dedicated portal.	Upstream	Brief	Current
	Sharing of the Code of Ethics, the Code of Business Conduct and the Code of Conduct for Sustainable Development, along with dissemination of the "Good Breeder's Manual" within the supply chains; Adherence to the SQNZ regulations at the Group's main farms.	Upstream	Brief /Medium	Current and planned
ESRS S3 - Stakeholder communities	INALCA contributes to local development by offering job opportunities, including in regions such as Africa and Poland. In Africa, in addition to creating direct employment, the company supports workers in opening bank accounts and provides health insurance coverage, thus promoting the economic and social inclusion of local communities.	Upstream e Own operations	Brief /Medium	Current
	Before building new plants, the Group conducts environmental and territorial assessments to analyse the impact on land use, biodiversity, and the presence of wildlife and natural resources, thus ensuring respect for the rights and well-being of local communities.	Upstream e Own operations	Medium/Long	Current
	Development of a Risk Assessment and Mitigation system in compliance with Regulation (EU) 2023/1115 (EUDR).	Upstream e Own operations	Medium	Current and planned
ESRS S4 - Consumers and end users	263,000 analytical controls performed in 2024.	Own operations	Brief	Current
	Implementation of the HACCP model to identify and control critical risk points, ensuring traceability, laboratory tests, systematic audits, and compliance with international food safety standards.	Own operations	Brief	Current
	Implementation of FS, ISO 17025, ISO 9001, ISO 22005 certifications, and private standards for food safety management, product claims, and organic production;	Own operations	Medium	Current and planned
	A dedicated Research and Development function is dedicated to product innovation and the full satisfaction of customer and end-consumer needs.	Own operations	Brief	Current
	Constant and transparent dialogue with activists, NGOs, and stakeholders is maintained.	Upstream and Downstream	Brief	Current
	Continuous training of its staff to protect consumer health and safety and prevent potential reputational damage resulting from the marketing of defective products.	Own operations	Long	Current
	Promoting a corporate culture focused on responsibility and awareness of food safety, ensuring that procedures are correctly implemented and that communication with customers, regulators, and institutions is transparent and timely.	Own operations	Medium	Current

**MDR-M**

**METRICS RELATED TO RELEVANT SUSTAINABILITY ISSUES**

For each metric in this Sustainability Statement, the methodologies and significant assumptions adopted are appropriately described in the relevant sections.

# ANNEX 7

## MDR-T - MONITORING THE EFFECTIVENESS OF POLICIES AND ACTIONS THROUGH TARGETS

ESRS TOPIC	Objective	Target	Scope of the objective	Baseline	Base Value	Time horizon	Progress report
ESRS E1 - Climate change	Calculation of other indirect GHG emissions (Scope 3)	Calculation and/or estimation of all emission categories foreseen for scope 3 (GHG Protocol)	Own operations	2020	Scope 3 not calculated	Medium	5 out of 25 categories reported
	Installation, expansion and activation of photovoltaic systems	100% of establishments found suitable	Own operations	2020	17% of existing establishments deemed suitable based on the latest update (2025)	Medium	74% of existing establishments deemed suitable based on the latest update (2025)
	Conversion of some existing plants to trigeneration and installation of new plants	CONVERSION TO TRIGENERATION: 100% of facilities with cogeneration. NEW INSTALLATION: planned in eligible facilities with specific energy needs.	Own operations	2020	CONVERSION TO TRIGENERATION: 0% NEW INSTALLATION: 0%	Medium	CONVERSION TO TRIGENERATION: 75% of plants with cogeneration installed NEW INSTALLATION: 1 cogeneration plant at the INALCA Poland plant (Sochocin) 1 trigeneration plant at the Italia Alimentari plant (Gazoldo) planned for 2026
ESRS E5 - Resource Use and the Circular Economy	Valorise the by-products of meat processing through a dedicated fat skimming and bone processing plant	Full operation of the two treatment lines (fat and bone) at the INALCA Castelvetro plant	Own operations	2022	0%	Medium	Plant fully operational
	Development of fertilisers from digestate (NP Sustainable Fertiliser Project)	Production of 3 fertiliser prototypes (2 organic, 1 organo-mineral) and agronomic tests completed	Upstream / Own operations / Downstream	2021	0	Medium/Long	Successful implementation. Evaluation of similar projects underway
	Packaging optimisation: weight reduction, thickness and increased content	Continuously improving packaging design to reduce the use of virgin plastic at all plants	Own operations	N.A.	N.A.	Long	Continuous improvement initiative. The company will evaluate the possibility of developing comprehensive and standardised Group KPIs in the coming years.
	Use of slaughterhouse by-products and agricultural waste to produce energy and raw materials with functional enhancements.	Construction of biogas plants at the Group's main strategic sites	Upstream / Own operations	Initiative in continuous improvement	0	Long	2 industrial biogas plants 5 agricultural biogas plants
ESRS S1 - Own Workforce	Ensure fair remuneration for its employees and non-employees in its Group locations	Ensure ongoing monitoring of remuneration policies and the applicable collective bargaining agreement to ensure a decent standard of living for workers and their families.	Own operations	1963	Founding year of INALCA S.p.A., Castelvetro di Modena.	Brief	Continuous monitoring
	Strengthen training and continuous skills development	Consolidate and continuously update skills to ensure ongoing professional development and improved individual and organisational performance through a dedicated e-learning platform.	Own operations	2022	Platform not implemented.	Brief	Platform usability enabled, in line with the specific skills required for individual roles.
		Increased hours of sustainability training for top management.	Own operations	2022	0	Brief	176 hours of training were provided in 2023. A four-day course focusing on CSRD and EU Taxonomy is scheduled for 2025.
		Increased training hours in Italy and abroad.	Own operations	2021	44,457 total hours of training provided.	Brief/Medium	47,781 total hours of training provided.
	Reduction of workplace injuries	Continuous improvement of regular checks and timely interventions to reduce risk situations and prevent accidents in the workplace.	Own operations	2023	320 injuries	Brief / Medium	271 injuries in 2024. Monitoring and continuous improvement.
	Promote an inclusive work environment, preventing and combating all forms of discrimination	Ensure consistent and continuous access to effective corporate tools and resources aimed at preventing and managing discriminatory or non-inclusive behaviour.	Own operations	2006	Launch of operations for the establishment of a new production plant on the African continent.	Brief	Guaranteeing adequate wages, regular employment contracts, and bank accounts for employees in Africa. INALCA ensures access to insurance coverage, private healthcare, and dedicated healthcare services.
	Ensure ongoing compliance with occupational health and safety regulations	Implementation of an integrated health and safety system in accordance with ISO 45001 at the Group's main offices.	Own operations	2012	0% of production sites.	Medium/Long	31% of production sites have ISO 45001 certification.
Prevent the risk of employee privacy breaches through the adoption of security and regulatory compliance measures	Adoption of Regulation (EU) 679/2016 GDPR-Privacy (where applicable)	Own operations	2018	Implementation of the Regulation in question.	Medium	Regulation (EU) 2016/679 correctly implemented and applied in all Group plants (where applicable).	
ESRS S2 - Workers along the value chain	Ensure fair remuneration for workers along the Group's value chain.	Continuously raise awareness among suppliers and customers about ensuring adequate remuneration to support a decent standard of living for the families of employees in INALCA's value chain	Upstream / Downstream	2004	Year of adoption of the Code of Ethics valid for all INALCA Group offices.	Brief	Continuous awareness raising and collection of signatures to the Code of Ethics and the Code of Business Conduct by customers and suppliers.
	Ensure optimal working conditions and compliant schedules, promoting employee well-being and an effective work-life balance.	Continuously raise awareness among suppliers and customers in promoting fair and safe working conditions along the supply chain	Upstream / Downstream	2004	Year of adoption of the Code of Ethics valid for all INALCA Group offices.	Brief	Continuous awareness raising and engagement with the Code of Ethics and the Code of Conduct among customers and suppliers through continuous monitoring of operating conditions, conducting periodic audits of suppliers, and actively involving workers in the reporting and improvement processes.
	Ensure full respect for human rights and international standards, preventing and abolishing all forms of forced labour and child labour, and promoting ethical and responsible working conditions.	Ensure full respect for human rights and international standards, abolish all forms of forced labour and child labour, and promote ethical and responsible working conditions..	Upstream / Own operations / Downstream	2004	Year of adoption of the Code of Ethics valid for all INALCA Group offices.	Brief	Continuous awareness raising and engagement with the Code of Ethics and the Code of Conduct among customers and suppliers.
ESRS S3 - Stakeholder communities	Promote the economic and social growth of local communities by creating employment opportunities and opening factories in developing areas.	Opening of plants in key developing areas	Upstream / Own operations / Downstream	2006	0	Long	7 plants in Africa (distribution platforms and deboning) 1 plant in Poland (beef slaughter and processing plant)
	Ensure full respect for the rights of local communities through a preventive risk assessment process regarding the impact on land use, natural resources, and wildlife, in accordance with the EUDR Regulation.	EUDR Regulation Compliance	Upstream / Downstream	2024	No audit performed.	Brief	Process in the start-up phase, in accordance with the development of the legislation.
ESRS S4 - Consumers and end-users	Improve product quality by strengthening laboratory analysis and controls along the entire production chain.	Increased quality and quantity of laboratory tests to ensure high standards of quality and food safety	Upstream / Own operations / Downstream	2023	246,000 laboratory tests performed.	Brief	263,000 laboratory tests performed.
	Nutrition and well-being through quality products.	Ensure the constant improvement of the nutritional profile and offer a wide range of quality products capable of satisfying the diverse needs and preferences of consumers.	Downstream	1963	Year of foundation of INALCA S.p.A.	Medium/Long	Continuous improvement



## SUSTAINABILITY REPORT 2024

### INALCA S.p.A.

Share capital  
€ 187,017,187 Fully paid up

Tax code 01825020363  
VAT number 02562260360

Company register  
Modena REA 311469

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The Sustainability Report  
was drafted and edited by:

**Quality, Safety, and Sustainable  
Development Department, INALCA S.p.A.**

Giovanni Lugaresi Sorlini  
In collaboration with Rebecca Crudele and Sara Broggi

**Central External Relations Department Cremonini S.p.A.**  
Roberta Ferri

**Compliance Office**  
Erika Preti

**Graphic design and layout**  
Corberi Sapori Editori sas

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### For contacts and information

External Relations Office Cremonini S.p.A.  
Email: [comunicazione@cremonini.com](mailto:comunicazione@cremonini.com)  
Tel. +39 059 754627

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be downloaded in digital format  
from this web page:







**INALCA S.p.A.**

Via Spilamberto, 30/c  
41014 Castelvetro di Modena (MO)  
Tel. +39 059 755111 - [www.inalca.it](http://www.inalca.it)