



Taste the SUN 

Sustainability Report 2020 - 2021

Imprint.

If you have any suggestions regarding this Sustainability Report, please contact us by email: communicationcr@sanlucar.com

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The Sustainability Report is available in Spanish and English versions. In case of any discrepancy between the two documents, the Spanish language version shall prevail

The following report applies the generic use of male without distinguishing the sexes. Furthermore, the explicit mention of the feminine is only justified when contrasting the sexes is relevant in the context.

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Renewal of commitment letter.



Dear friends of SanLucar,

The last year showed us that everything can change in an instant, and that it is necessary to reflect and innovate. This is precisely what we have done at SanLucar, and we would like to share our achievements once again in our Sustainability Report.

We are guided by our philosophy: »taste in harmony with people and nature« and our values, and with them our commitment to the Ten Principles of the UN Global Compact and the Sustainable Development Goals.

Transparent communication with our stakeholders is very important to us, so this year we have decided to merge the Non-Financial Information Statement (NFS) published annually in accordance with Law 11/2018 of Spain and the Progress Report with our Sustainability Report. In so doing, we are taking into account the guidelines of the Global Compact and the legislation applicable to this type of reporting, and we will also continue to report on the GRI (Global Reporting Initiative) indicators. This merger does not mean we are abandoning the transparency and comparability of our reporting this year, as it will be reviewed by third parties.

Renewal of commitment letter

SanLucar was founded in 1993 as a trading company, and since then we have grown in the fruit and vegetable segment to now offer the largest range under one brand name. We started as a producer in Tunisia in 2008, followed by South Africa in 2012 and Ecuador in 2013. At the beginning of this year we went a step further, and increased our product range to include the sale of plants and flowers. We are excited about this new challenge.

In times of difficulty, global collaboration and assistance around are more crucial than ever. Our team has therefore not ceased to develop projects within our DREAMS programme, supported by various partnerships. Deficits in learning and developmental have emerged in children's education in recent months, and as a consequence of the COVID-19 pandemic. This has motivated us to invest even more in educational projects, such as school support in Spain with the Fundación Iniciativa Social - FIS (social initiative foundation), the improvement of a rural school in Costa Rica in collaboration with our pineapple farmer, and continued investment in our educational programmes in South Africa and Ecuador. You can find more information about our DREAMS programme in the DREAMS magazine and on the DREAMS website www.sanlucar.com

Partnerships are essential to achieve the goals we have set ourselves as a company and as a society, and any actions produce more joy and better results when we achieve things together. I would like to take this opportunity to thank all our project partners including institutions, NGOs, clients, private individuals, universities, employees and governments. With you, we can turn dreams into reality in a way that makes us proud of what we are doing together.

We hope you enjoy reading this report.

Best Regards, Stephan Rötzer
Founder and CEO of the SanLucar Group

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke, representing the name Stephan Rötzer.



Taste the SUN 

1. About the Sustainability Report.

1. About the Sustainability Report.

SanLucar produced the first Sustainability Report for the 2010/2011 financial year; since then we have introduced changes and improvements to increase the visibility and transparency of the company's activities and results. With this report we have gone a step further by merging our Progress Report and our Statement of Non-Financial Information (NFI). This translates into an integration of the requirements of the Global Compact commitment and of Law 11/2018 of 28 December which regulates Non-Financial Information Statements in Spain and the European Union (EU) Directive 2014/95/EU.

Within this framework, this report contains the Group's information and results on social, labour, environmental and good governance issues, along with aspects of the company's structure. All the information provided is based on the recommendations and requirements of the Global Compact and Law 11/2018, and is a demonstration of the commitment undertaken by signing its Ten Principles. The content is relevant to the Group and its business. This report presents the results for the period from 1 July 2020 to 30 June 2021. It also supplements the annual accounts and the consolidated management report for the financial year 2020/2021,

The companies referred to in this report are listed at the end of this report in the annex "Group companies", with the parent company Mamaritz S.L.U. referred to throughout the report as the "Group" or "SanLucar".

The GRI (Global Reporting Initiative) 2016 Standards have been used as a reference to create this report. We have used this framework is to comply with the principles to determine the content and quality of information, and to ensure its comparability. A GRI table has been included at the end of the report to make it easier to find the content specified herein.



GRI standards, and the introduction of text boxes throughout the report, thus highlighting its importance and making it more visible.

The selection of the GRI standards that have been assessed and whose results have been included in this report is based on the analysis of the Group's activities in the various countries in which it operates and its social and environmental impact. We have also considered the contribution of each indicator to the decisions to be taken, and the corporate strategy and implementation of preventive and corrective measures. The indicators presented are directly related to the activity and are relevant to the interest groups defined by such activity.

However, where consolidated data is unavailable for an indicator or is not available for any of the companies, this is indicated next to the corresponding graph or table. The comparability criterion has been applied as far as possible. Comparative data is not provided for indicators which do not provide the necessary comparability due to a change in criteria.

SanLucar has requested an external review from Luis Caruana & Asociados, S.L. in accordance with its commitment to transparency and the objective of verifying the reliability and consistency of the information provided and its relevant indicators.

Following the verification process, an independent review report was produced which includes the objectives and scope of the process, the verification procedures used and its conclusions. The verification has been carried out in accordance with the requirements set out in the International Standard on Assurance Engagements 3000 Revised issued by IAASB and IFAC and with the Guidelines on Assurance Engagements on Non-Financial Information Statements issued by the Institute of Chartered Accountants of Spain.

During the verification process, meetings with the Group's responsible personnel, analysis of the scope and processes, we conducted a review of the content-related information and verification based on a sample selected and the letter of interest from the administrators and management.

The report has been compiled in collaboration with the various Group companies and area managers through meetings, interviews and the collection of relevant indicators. The interests and expectations of the stakeholders have been taken into account, who were also interviewed and their contributions included in the report.

We've also revised the existing operations in the value chain and those of the company's own activities to enable us to prioritise the Sustainable Development Goals (SDG). The projects, activities, preventive measures and interest groups (stakeholders) are detailed in the different chapters of the report. An assessment of SanLucar's potential corporate risks has also been carried out.

The report was drafted by the Communication & CR department and, following verification by the external company, our senior management approved the Sustainability Report 2020/2021 for publication.





2. About SanLucar.

2.1. Vision, mission, values.

At SanLucar we believe that all our actions count, and that is why we and our employees are aware of our values and commitments and apply them daily in our work and decisions.

For SanLucar, the balance of nature is just as important as the responsible treatment of our natural environments and the people who work with us. Our corporate philosophy is "Taste in harmony with people and nature".

Our vision: to bring joy and wellbeing to the world.

Our mission: to provide everybody with our natural, fresh and deliciously tasty fruit and vegetables. And to do so in a way that we can be proud of.

Our values:

1. We act co-operative way: we work as a team to achieve healthy and sustainable growth.



2. We learn every day: only those who are willing to learn and improve daily are mature enough for SanLucar.



3. We get results: similar to our fruit trees, we give our best every day to deliver a good harvest.



4. We are innovative: we enrich each other with fresh ideas, because without freshness, neither we nor our fruit are going anywhere.



5. We give our best: we pursue our goals responsibly and with passion. This is the impulse which allows us to flourish.



2.2. The Code of Ethics demonstrates our commitment to our values.

SanLucar was founded in 1993 with firmly rooted values, which are reflected in our Code of Ethics which was last revised in 2016. The SanLucar Code of Ethics is based on the principles of the International Standard SA 8000, and the Ten Principles of the United Nations Global Compact and the guidelines of the ILO (International Labor Organisation).



About SanLucar



We, our farmers and suppliers are committed to the Code of Ethics, which covers issues such as child protection, equality, fair working conditions, occupational safety and health, anti-corruption and environmental protection. Taking into account worldwide trends in sustainability and corporate responsibility, the next revision was planned for 2020, but due to the change in priorities with the COVID-19 pandemic, was postponed to 2022.

The Code of Ethics is publicly available on our website.
(<https://www.sanlucar.com/es/dreams-2/publicaciones/>).



GRI 102-16

2.3. Business model.

The Group operates worldwide in the agricultural sector in the production, import, export and marketing of high-quality fruit and vegetables worldwide. Something that differentiates our business model is the marketing of our products through our own brands. In this respect, the main brand under which the company operates is the SanLucar brand, which accounts for approx. 45% of the total sales volume. With around 100 varieties of fruit and vegetables from over 35 countries, the SanLucar brand offers the widest range on the German, Austrian and Dutch markets, where we generated 88.3% of our sales in the 20/21 financial year. SanLucar is currently expanding into Canada, Scandinavia, Italy, England, Poland, Ecuador, Russia, the Middle East and North Africa. The product portfolio also includes smoothies, juice, freshly cut fruit, dried fruit, fruit with yoghurt, nuts and olive oil. In January 2021 we expanded our product range to include high quality flowers, ornamental and aromatic plants under the name SanLucar Flowers. These products represent approx. 1.4% of total sales.



SanLucar operates in various countries throughout the world, both for the growing and marketing fruit and vegetables. We work with farmers worldwide and have our own production areas in countries such as Spain, Tunisia, South Africa and Ecuador to offer top quality products. We are aware that some of the areas where we have a presence are developing countries. Therefore, with our local partners, we carry out social projects under the DREAMS programme ("Developing Responsible Environments and Multicultural Societies"). The aim of these projects is to develop initiatives that will have an impact on improving the quality of life of employees, their families and local communities, as it is often small actions that result in a noticeable and lasting improvement in the quality of life. Chapter 6 describes all the projects being carried out in the different countries in more detail.

2.4. Business environment and interest groups.

Being part of the food market entails a great responsibility: to provide millions of people around the world with access to basic nutrition. A population that is continuing to grow and whose expectations in terms of taste and consumer experience are also changing and varying, which demands the highest guarantee of food quality and security. The growing trend for healthy eating in the markets where the Group traditionally operates means that fruit and vegetables are a basic element in the shopping baskets of our consumers.

We must involve all the stakeholders in the company to fulfil this responsibility and to ensure the standard of quality remains consistently high. SanLucar understands sustainability as the ability to create value for its interest groups in the short, medium and long term and to commit to the wellbeing of future generations, with nature as its greatest ally. Interest groups (stakeholders) are any group or individual who can affect or be influenced by the company's activity.

The interest groups we have identified are as follows:

Interest groups	Relevant chapter
Employees	5. Our employees
Clients (B2B)	2. About SanLucar
Suppliers	8. Suppliers and subcontractors
Community and NGOs	6. Community development 7. Environment
Public bodies	6. Community development 7. Environment 12. Summary table of indicators GRI
Press	Throughout the report
Investors	9. Consolidated balance sheet Table GRI Annex

The establishment of various measures enables us to identify the most important challenges for our interest groups, to neutralise risks and realise opportunities:

- Policies: formal written documents that define the values and communications.
- Actions/projects: actions help shape the policies that have been developed and minimise the risks identified. These actions are planned over time and designed based on the target group.
- Monitoring tools: evaluation and control of the results obtained from the actions implemented. They provide the tools to monitor compliance with policies and help to identify failures in the management system that could be improved.
- Monitoring indicators: quantitative and qualitative data to measure the degree of implementation of ideas (policies, actions/projects and monitoring tools).

GRI 102-40



2.5. Markets in which we operate.

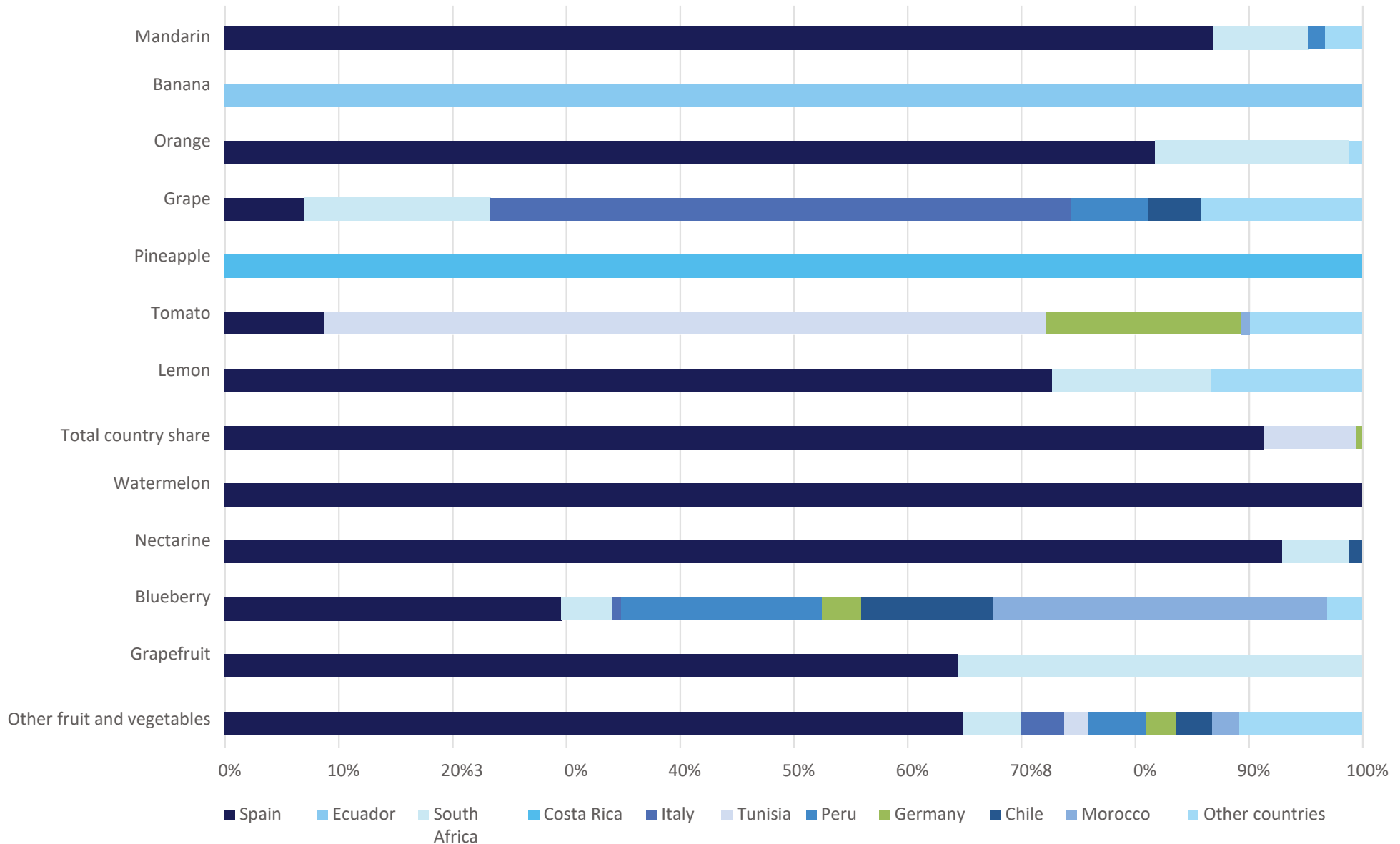
The fruit and vegetable market is global. Customers are located in 40 countries around the world. The supply of high quality fruit and vegetables all year round is a differentiating factor that has a positive effect on the purchasing decision of the Group's customers. SanLucar has production sites and suppliers all over the world to improve its response capacity.

The following image is a graphic representation of the producing countries, both our own and those of third parties, marked as growing countries; sales countries and the different production and marketing subsidiaries of the Group.

GRI 102-4 / 102-6



Origin of the fruit and vegetables of the SanLucar brand that were most widely distributed in the 2020/2021 financial year



At 49.4%, the majority of SanLucar branded fruit comes from Spain. A total of 57% of our fruit and vegetables come from Europe and 28% from South and Central America. This is followed by South Africa with 7.1% and Tunisia with 4.4%.

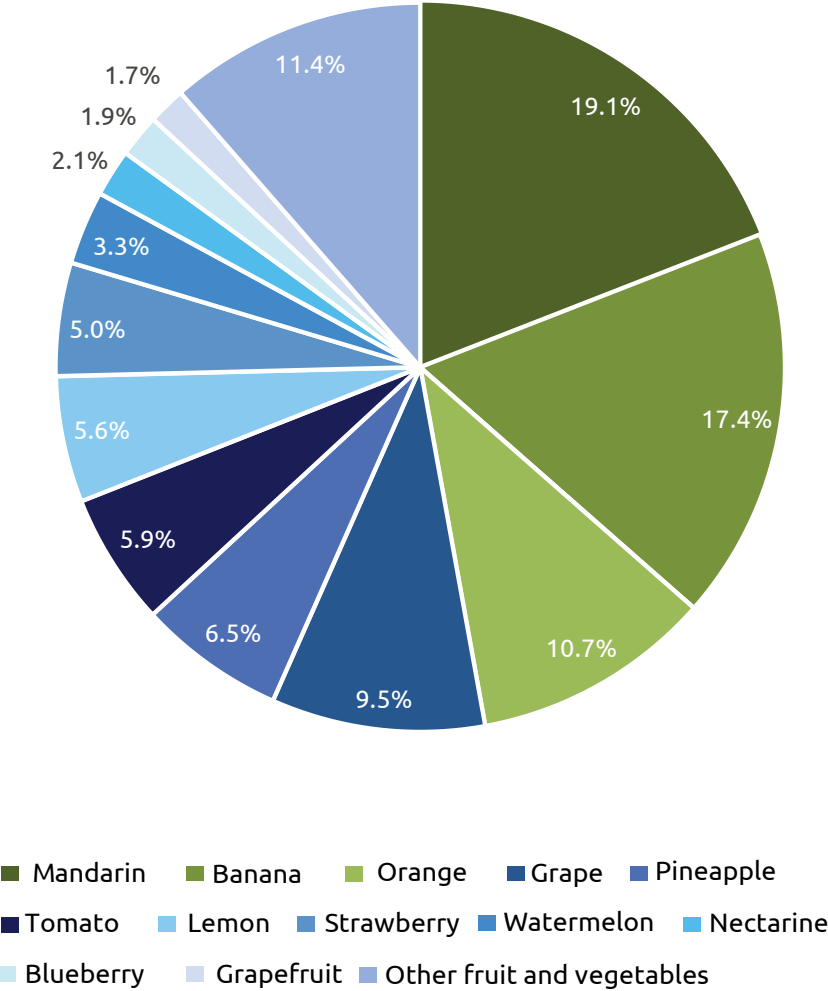
Fruit varieties sold

The three fruits that achieved the most sales under the SanLucar brand this season were mandarins, bananas and oranges. The following image provides a detailed breakdown of the best-selling fruit and vegetables per kilo. Note that the individual weight of bananas and pineapples is already very high, which is why they appear in the first places in sales per kilo.

At 85.5%, most of the fruit is sold on the German and Austrian markets. The following table shows the main consumer countries of the SanLucar brand:

Germany	Austria	Netherlands	Saudi Arabia
55.67%	29.79%	2.86%	2.50%
Poland	France	United Arab Emirates	Other countries
2.30%	1.17%	1.6%	4.55%

Varieties of fruit sold in the financial year 20/21



2.6. Goals and strategy.

SanLucar establishes our vision, philosophy our values, the way we are going and where we want to go. We have set ourselves goals and a strategy to align the entire Group with its subsidiaries. The goals are focused both on our products, the way in which they are grown and on all the people behind the product; the employees and their families. We have therefore defined the following goals:

- To provide top quality fresh fruit and vegetables all year round.
- To offer fresh fruit and vegetables using sustainable cultivation methods and packaging and logistics processes.
- Implement a corporate responsibility programme whose projects address both the needs of employees and their families and the communities in which we operate.

The company implements a range of strategies to achieve these goals, including finding the best areas for each product around the world, close collaboration with farmers over the long term, investment in R&D&I to conduct research into sustainable and smart technologies for agriculture and into more varieties that have greater resistance to pests and diseases, investment in new, more sustainable packaging and extending the commercial life of the product. The latter is one of the strategies that SanLucar has focused on recently.

Behind every product are people and their families. We invest in our own projects that will have a positive effect on the quality of life of employees, their families and communities. We have developed projects and activities within our DREAMS programme in many of the countries in which we operate. It is essential to create partnerships and networks with interest groups to exchange experiences and to support each other if we are to achieve our goals.

Management is working with all the areas of the company to review our goals and strategies for the future.

GRI 102-15



2.7. Group structure.

The operating Group's companies are detailed below: the operating Group's activity is mainly the production and marketing of top quality fruit and vegetables under different brand names, and has been

developed through different companies that have been created as the business has grown.

GRI 102-45

Group companies
Spain
Mamaritz, S.L.U.
The Roetzer Family, S.L.U.
SanLucar Fruit, S.L.U.
Consorcio SanLucar Group, S.L.
Berry Selections, S.L.
Santa María Fruit, S.L.
Uniqua Fruit, S.L.U.
Agrícola Dehesa de Baños, S.L.U.
Germany
Looking for Fruit GmbH
SanLucar Vertrieb Deutschland GmbH
SanLucar Deutschland GmbH
SanLucar Fruit & Juice GmbH
SanLucar Flowers GmbH
Holland
SanLucar Fruit Import Netherlands BV
Austria
Fruit to Go, GmbH
Victoria Fruit Handels, GmbH
SanLucar Manufaktur GmbH

Italy
SanLucar Italia, S.R.L.
Frutta Natura, S.R.L.
France
SanLucar Fruit France, S.A.R.L.
Tunisia
La Cinquième Saison, S.A.
Shares & Co RH & Services, S.A.R.L.
Les Perles du Desert, S.A.
SanLucar Tunisie, S.A.R.L.
SanLucar Services, S.A.R.L.
SanLucar Flor'alia, S.A.
Ecuador
SanLucar Ecuador, S.A.
Lexkingsa, S.A.
Quilziolli, S.A.
Morocco
SL Morocco, S.A.R.L.
South Africa
SanLucar South Africa, (Pty) Ltd
SanLucar South Africa Citrus (Pty) Ltd
SanLucar DeHoek (Pty) Ltd
SanLucar Patensie (Pty) Ltd

2.8. Company news.

Plants and flowers.

On 1 January 2021 SanLucar Flowers was created as a new business unit to supplement the company's core business of producing and marketing premium quality fruit and vegetables.

The Group's new subsidiary based in Kevelae, in the heart of one of Germany's leading plant-growing regions, is perfectly aligned with the needs of the food retail trade. In countries such as Germany or Austria, it is common for the end consumer to buy plants or flowers from the supermarket shelves. This trend seems to be spreading to more countries.

The Group's new unit is staffed by a team of highly experienced and recognised specialists in the green industry. SanLucar works exclusively with certified flower and plant growers, mainly from the central regions of Germany, Holland, Italy, Spain, Denmark and Poland for this new venture.

The SanLucar Flowers product range has been very popular in supermarkets in Central Europe since it was launched.

Change of fiscal year.

From 1 January 2022, SanLucar will change its fiscal year, which currently runs from 1 July to 30 June, to coincide with the calendar year (1 January to 31 December).

The main reasons for this decision are as follows:

- To simplify the work of the commercial division, which should result in better planning and strategy.
- To better align the fiscal year with the productive seasons of the majority of our farms.
- To adapt more effectively to tax and legal requirements.

This change will mean that the next financial year, which will start on 1 July 2021, will end on 31 December 2021, and will only last for 6 months. Thereafter we will apply the new dates from January to December.

GRI 102-10





Taste the SUN 

3. Good governance and transparency.

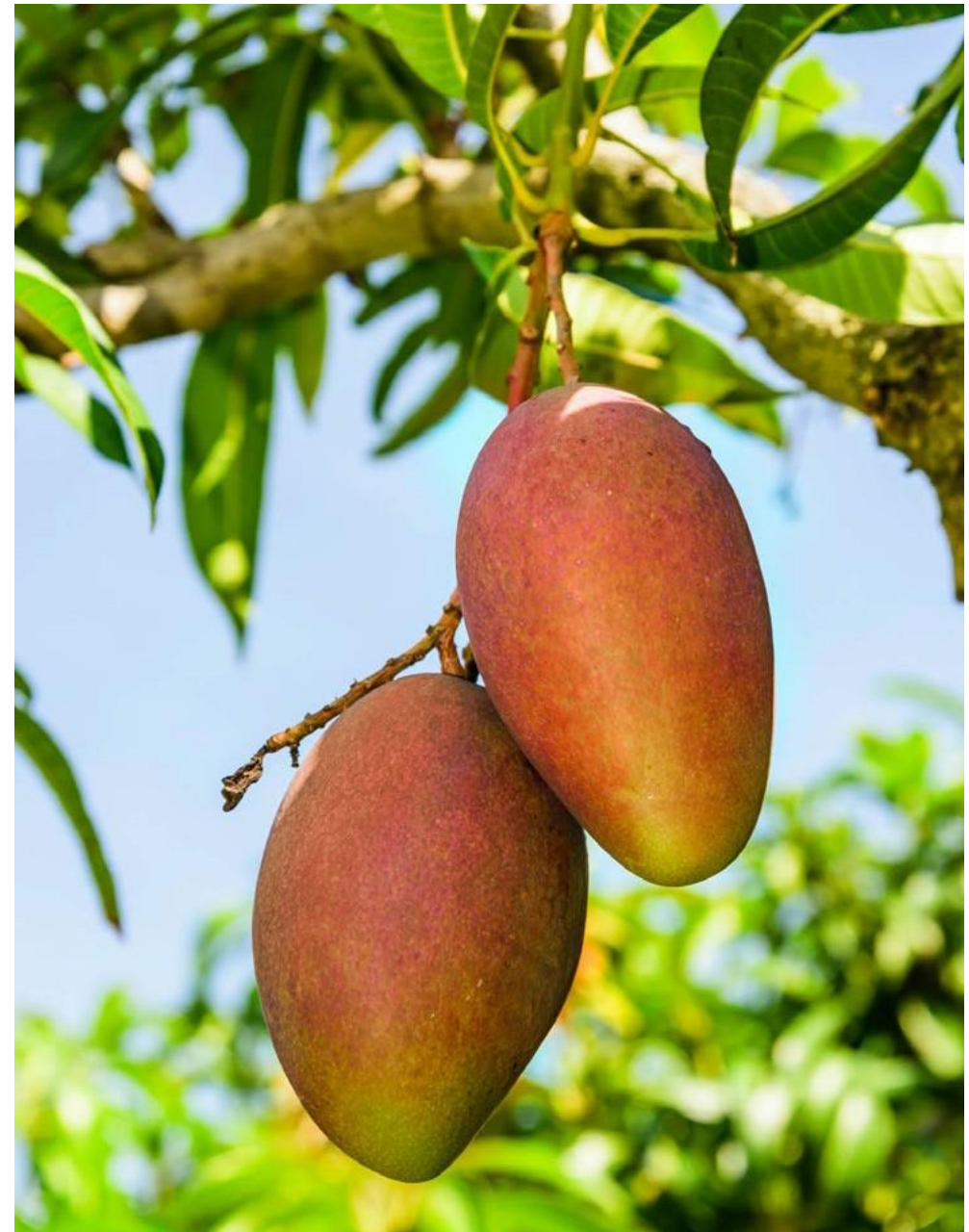
3.1. Our corporate policies.

Our mission is to provide everybody with our natural, fresh and deliciously tasty fruit and vegetables. And to do so in a way we can be proud of.

To fulfil this mission, we have set ourselves the goal of ensuring that all farms the produce our fruit and vegetables must be committed to the welfare of their workers, comply with applicable legislation and protect the environment. This led us to implement an ambitious project with our suppliers approx. 8 years ago, whereby 100% of our suppliers and farms were under an obligation to be certified by Global G.A.P. and assessed for their compliance with GRASP social criteria. This enables us to maintain transparency with our customers and consumers, as we are assessed by third-party external companies.

In view of international trends in human rights and corporate responsibility, we promote the implementation of globally recognised social standards such as the Rainforest Alliance, SMETA, SIZA, BSCI and others among our suppliers. The standards help companies to comply with human rights, the agreements of the International Labor Organization (ILO), health and safety criteria and to improve their internal management on a continuous basis.

The certifications of the SanLucar marketing and production subsidiaries are tailored to their activities and needs to ensure good management and transparency at every stage of the value chain.



Our corporate policies.

We have the following certificates at all our subsidiaries:

Location and companies	IFS Broker	IFS Wholesale/ Cash & Carry	QS	FSSC 22000	ISO22000	Authorised organic product operator	Organic trading	SA8000	Global GAP chain of custody	Global GAP	GRASP	Rainforest Alliance	SMETA	SIZA
Spain														
SanLucar Fruit S.L.U.	X	X				X		X	X	X	X			
Agrícola Dehesa de Baños, S.L.									X	X				
Santa María Fruit S.L.									X	X				
Germany														
SanLucar Vertrieb Deutschland GmbH		X	X											
SanLucar Deutschland GmbH		X	X											
Austria														
SanLucar Obst & Gemüse handels GmbH				X	X		X							
Fruit To Go GmbH	X													
Ecuador														
Lexkingsa S.A.										X		X		
Quilziolli S.A.										X	X			
South Africa														
SanLucar South Africa Citrus (Pty) Ltd														X
SanLucar de Hoek (Pty) Ltd														X
Tunisia														
La Cinqième Saison S.A.										X			X	
SanLucar Flor'Alia S.A.										X			X	

3.2. Policies, procedures and due diligence.

The corporate policies are similar to SanLucar's own legislative framework on which we base our daily actions, whether in our relations with suppliers, customers or our own employees. They are a guide to help us never lose sight of how we want to travel the path to success so we can be proud of what we have achieved. As our mission states: »to provide everybody with our natural, fresh and deliciously tasty fruit and vegetables. And to do so in a way that we can be proud of«.

Our integrated policy includes all aspects of culture, quality, environmental protection, corporate responsibility (CR) and human resources management in the SanLucar Group.

On the one hand, we have a quality and food safety management system manual and also have a management system manual for the SA8000 standard. Both manuals are revised every season



and include all the processes that occur within SanLucar. We have our own Code of Ethics, a document that clearly defines our commitments and requirements in terms of CR, ranging from the protection of child labour and voluntary work to environmental protection, good corporate governance and anti-corruption. We have been making efforts to communicate the Code of Ethics in recent years, both internally and to all our suppliers to facilitate compliance with the Code throughout our value chain.



3.3. Risk management in human rights.

Our commitment to human rights began in 2009 with the decision to implement the internationally recognised SA8000 social standard at our headquarters in Valencia, Spain. In 2011 we decided to go a step further by signing up to the Ten Principles of the Global Compact and we published our Code of Ethics in 2012.

An awareness of the value chain, suppliers and the risks that can arise in human rights is becoming increasingly important and now mandatory for companies like SanLucar. We cannot ignore what happens in the countries of origin of our suppliers if we want to produce products that comply with our philosophy »taste in harmony with people and nature«.

In 2020, we therefore embarked on an ambitious project at SanLucar with the process to implement human rights due diligence. The aim is to contribute to the transparency of our value chain and to also identify current and potential risks in terms of human rights. The UN Guiding Principles on Business and Human Rights have been the reference document for us to design our analysis process.

In this first analysis, we have concentrated on the fifteen most widely sold products (kg) in recent years and on the main countries of origin of these products.

We have identified current and potential long-term risks in our value chain using the CSR Risk Check,



GRI 412-1

The report was prepared by MVO Nederland, the Agency for Economic and Development Affairs (AWE) of the Federal Government of Germany and UPJ e.V., based on our own experiences, internal audits and feedback from the sector.

The risks identified have been classified into the following categories: fair commercial practices, human rights and ethics, labour rights and the environment. We have defined a number of parameters to calculate the risk value of each of the risks identified to assess them. We are currently in the process of defining the interest groups who are directly and/or indirectly affected and/or involved. When this process has been completed, the risks identified will be assessed through consultation with the various interest groups.

Identification is the basis for creating action plans to prevent or minimise risks in the future to comply with due diligence.



3.4. SanLucar committees.

The Group supports freedom of association and collective bargaining, with an employee representative and different committees in its work centres: the Inter Area Committee (CIA) of SanLucar Fruit, S.L.U. employees, the equality committee and the health and safety committee, among others. The committees are self-governing through their members.

All the committee members are available to employees to express their suggestions, complaints and grievances, thus enabling employees to exercise their right to collective bargaining.

The periodic meetings and negotiations with the employees' representative or the committees will take into account the legitimate interests of the business group and its employees. The Group has various committees intended for these purposes, the most important of which are the following:



GRI: 102-41 / 403-1 / 407-1



Spain.

- **Inter Area Committee (CIA):** the aim of the CIA is to improve the conditions of SanLucar employees in every possible way by facilitating dialogue between the company management and employees. There are currently five members who meet with the HR department every two months and, CIA members meet as required but at least once a month.

Its essential role is to serve as a channel where employees can express their needs and concerns and to implement changes in all the aspects that can improve working conditions and the use of SanLucar facilities, to liaise with the management through the management representative for SA8000 and directly through the representative for SA8000.

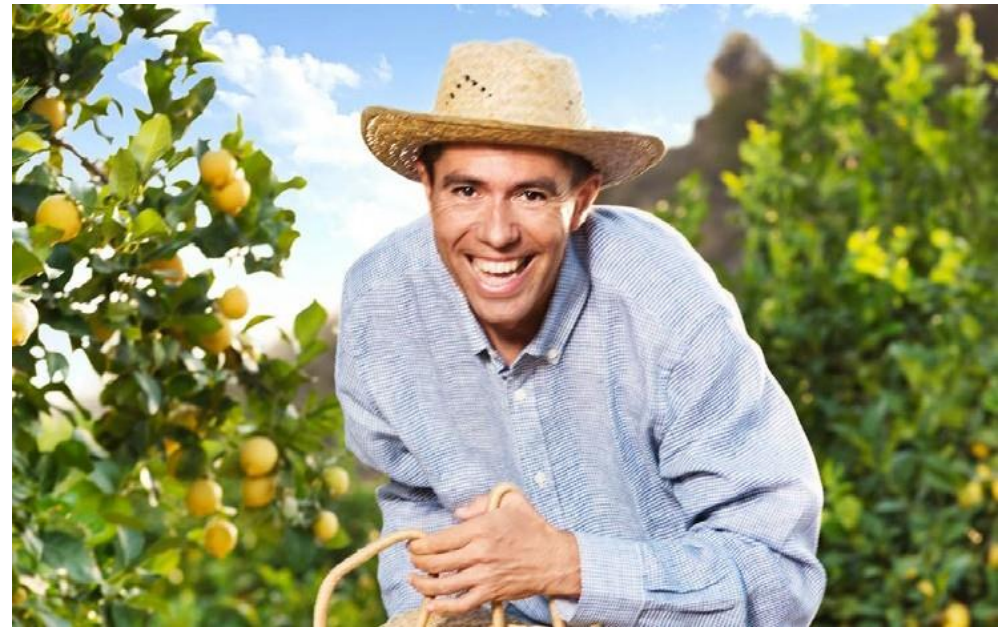
- **Health and Safety Committee (CSS):** the aim of the CSS is to guarantee the participation of workers in all health and safety issues in accordance with the provisions of the Prevention of Occupational Risks Act and the SA8000:2014 standard. It consists of six members, with parity (three members representing the company and three representing the workers).
- **Social Performance Team (SPT):** In February 2019, the committees were joined by the social performance team to ensure compliance with the requirements stipulated by the SA8000 standard at SanLucar. This team has eleven members who meet every two months.
- **Equality Committee:** the main aim of this committee is to ensure fulfilment and implementation of all the company's equality policies. It consists of four members: the equality officer, the management representative, the workers' representative and the CR manager.



- **Data Protection Committee:** this committee comprises five members and its main tasks are to:
 - Process the record maintenance management
 - Check and validate data processors
 - Risk assessment
 - Manage related internal or external queries or doubts (including attention to data subjects' rights)
 - Monitor compliance or conduct periodic reviews/audits
 - Assess security incidents which may affect the data

- **Coronavirus Co-ordinating Committee:** since the beginning of March 2020, this committee has been responsible for studying and implementing the recommendations of the public authorities and clarifying any doubt that may arise regarding the COVID-19 pandemic. With a total of eleven members, the following departments are represented on this committee: Management, Quality, Occupational Risk Prevention, Human Resources, Legal, Commercial, IT, Workplace Management, CIA and Communication.

- **Crisis Committee:** the aim of this committee is to manage crises when they arise. Owing to the difficult task of managing crises and since they can be very different in nature, this committee includes the Quality, Communication & CR, Legal and Management departments. This committee meets when necessary to deal with a crisis.



Germany.

- **Coronavirus Committee:** this team comprises three people who meet once a month (or more often, if necessary) to evaluate the developments in the pandemic.

- **Safety at Work Committee:** a committee consisting of five people that handles all matters relating to health and safety at work at the companies in Germany. They meet four times a year.

- **HCCPA Committee:** the aim of this committee is to monitor and implement the hazards and critical control points analysis throughout the value chain on all matters relating to Germany. It has six members, one of which is an external expert. They meet four times a year.

- **Crisis Committee:** the aim of this committee is to manage crises when they arise. Owing to the difficult task of managing crises and since they can be very different in nature, this committee consists of nine members and they meet when necessary to deal with a crisis.

Tunisia.

- **Health and Safety Committee:** there is a health and safety committee at the two main farms owned by SanLucar in Tunisia. Each committee has five members: two workers' representatives, one management representative, the health and safety officer and the personnel doctor.
- **Employees Committee:** similar to the health and safety committee, there is one at both main farms. The aim of the committee is to improve all aspects of the conditions of the employees of SanLucar and to promote dialogue between the company managers and the employees. There are a total of ten members on the committee, which is located at the La Cinquième Saison farm.



Ecuador

- **Health and Safety Committee:** each farm has a health and safety committee, which all comprise twelve members. There is an equal number of members (six from the management side and six field members). The meetings are held monthly.
- Besides this committee, there are also **workers' representatives;** two at the Magdalena farm (one for the packing workers and another for the field workers) and one representative at the Santa Elena-Lourdes farm.

South Africa.

- **Health and Safety Committee:** in South Africa this committee has eight to ten members, with an equal number of administration and field workers at all times. Meetings are held every two months
- **Workers' Committee:** these committee meetings are held twice a month and chaired by the workers' representative.
- **Community Committee:** this committee is responsible for improving all the aspects of life on the farm, because the workers also live on our Rooihogte farm. Therefore, it is a committee that has no limit regarding member numbers and currently has ten members. The meetings are held monthly.

3.5. Anti-corruption.

The Group is a signatory member of the Global Compact, the world's largest association for the defence of fundamental values in the areas of human rights, labour standards, the environment and anti-corruption.

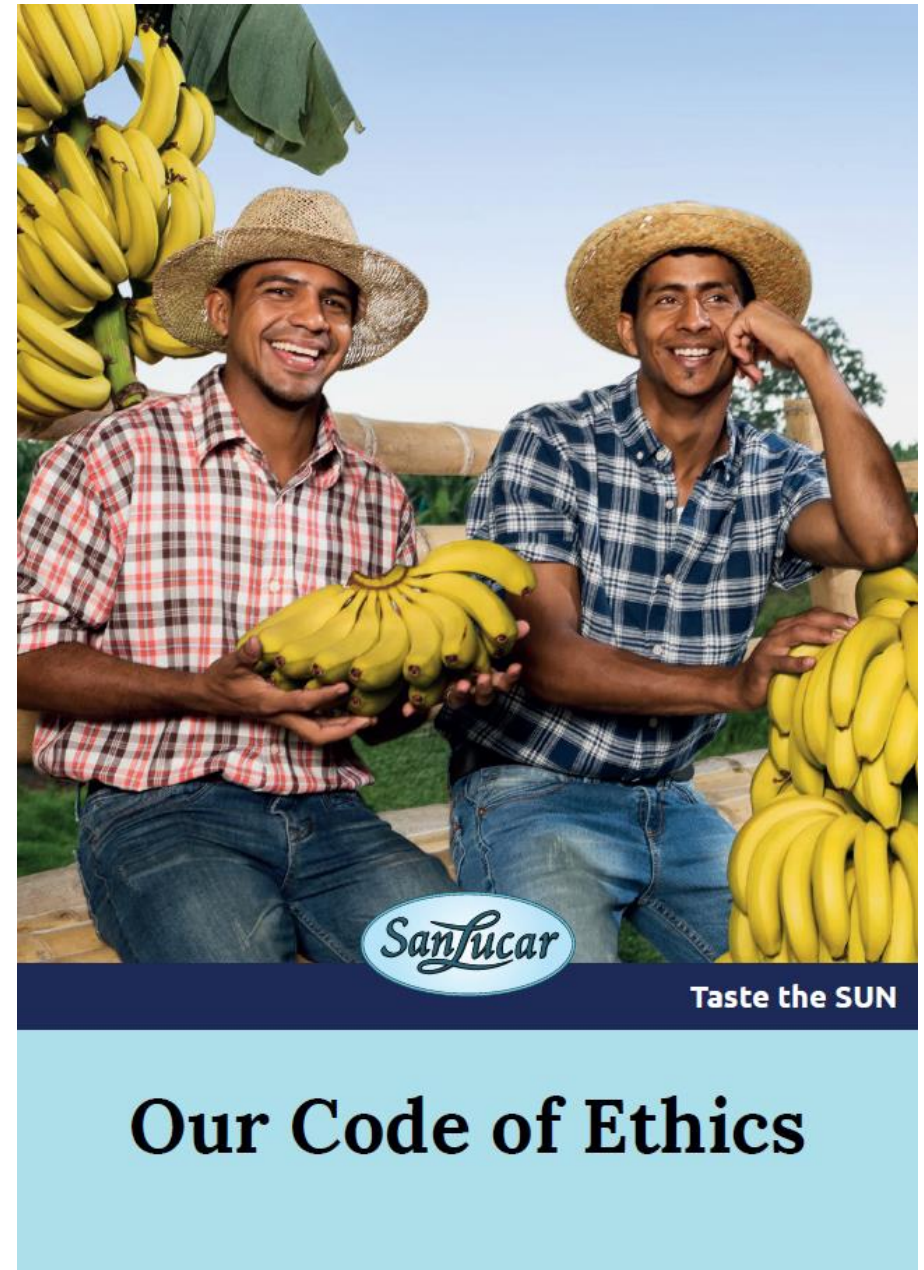
Section 10 of the Code of Ethics is devoted to the fight against corruption, bribery, kickbacks, influence peddling and money laundering, and enshrines as general principles the obligation undertaken by the Group to eradicate all forms of corruption and the absolute prohibition of all corruption and bribery. These principles are aligned with Principle 10 of the UN Global Compact and have been developed as internal policies that seek to eradicate such conduct.

During the 2019-2020 financial year, the board of management of the Group's parent company approved a specific policy on corruption, which stipulated the general principles and developed the regulations of the Code of Ethics applicable in this respect. Due to the situation with the COVID-19 pandemic, SanLucar was forced to delay the development and subsequent approval of the corruption policy for the 2022 financial year.

It should be noted that no cases of corruption have been recorded in any of the Group's companies or business partners.



GRI 205-2



3.6. Money laundering.

The Group has implemented payment and collection processes and a structure of proxies through which it ensures adequate control and monitoring of cash transactions in all its operations.

For collections and payments, the Group uses bank transfers and nominative payment instruments to ensure full traceability of all cash transactions.

There are also strict rules for the management of the "cash box" which, in addition to minimising the amounts of money that can be held in the "cash boxes" of the different companies to minimal amounts, regulate in detail the distribution of amounts withdrawn, with the appropriate justification required in all cases for the request for funds in cash and documentation regarding the use of such funds.

This transaction and control is carried out using the Notilus application, where the employee makes the cash request, which is approved by the Finance department through the application. After strict controls, the employee also signs a "receipt" for the cash, and must submit the supporting documents for the expense note so the expenses can be approved and reimbursed (through the process specified in the paragraph below).

Similarly, strict controls are carried out on the reimbursement of expenses incurred by employees in the course of their work duties that require the prior authorisation, the reason, justification and approval by the senior manager to proceed with the reimbursement, at all times in accordance with the expense parameters/limits established by Human Resources. These expenses are also managed from the Notilus platform.

Use of the company bank card (for employees



who, owing to their category, have a company card), the requirements for authorisation of the use of the funds and the justification of such use, are even more rigorous, as the ticket has already been previously accounted for by directly debiting the company's account.

Thus, in the event of loss, misplacement or breakage of the ticket and the inability to present it, employees must justify the expense in any other reasonable way, e.g. travel receipt, expense listed in a bank statement, etc.

The decision to withdraw funds from bank accounts is assessed by the Finance department, and the payment files are created by persons who have a separate role from those who are authorised signatories in the company. Therefore, the role that has a joint and several signature, not a joint signature, has the special power to approve payment decisions previously prepared by another role independently, which guarantees that the process is secure.



GRI 205-2

3.7. Cyber security.

Cyber security is a very important issue for SanLucar, even more so in the wake of the pandemic, which forced us to implement teleworking on a massive scale for the positions that enabled such working.

We conducted a short interview with Andrés Pérez, our IT Infrastructure and Security Manager at the head office to find out more about the importance of cyber security at SanLucar.

Cyber security is becoming increasingly important globally, even more so in critical situations such as those we experienced during the pandemic. Have cyber crime and cyber attacks increased during the pandemic or have they remained the same as before?

Cyber attacks have increased considerably as hackers have sought to take advantage of the lack of protection on computers when working from home, which are generally protected by their company's security measures.

How are we at SanLucar adapting to a future where the online world is becoming more and more important? How are we protecting data at SanLucar?

SanLucar was already gearing up to remote working before the pandemic situation. The dynamism of our business and the need to work in many situations in real time from any location paved the way for us to deploy the necessary tools to do this. The protection of corporate data is a constant concern, and we have implemented numerous technical measures to ensure total security. We carry out daily backups of all the corporate information that we also replicate in other locations to avoid any contingency that may arise in our facilities.



Full name:

Andrés Pérez

Position:

IT Infrastructures and Security Manager

Are the established protocols the same in all SanLucar locations, or do you work differently in different countries?

Security guidelines extend to all subsidiaries and we continue to work on improving data protection procedures to facilitate business continuity in the event of a contingency.

How is a cyber attack detected and what mechanisms are in place to prevent potential attacks on vulnerable points? Have we suffered any attacks in the last three years? If so, what actions were implemented to manage them and what lessons did we learn from the experience?

We have protection mechanisms in place at three levels. Perimeter security devices at each of the sites, for each workstation/user and for the corporate information archived in our storage systems. Each of these layers of protection work together to detect and block the continuous attempted attacks that occur on a daily basis. Luckily, we have suffered no attacks in which our protection systems have been breached and our business has been at risk.

What is the greatest cyber security risk facing a company like SanLucar?

From an operational point of view, the biggest risk is data hijacking where the attackers block corporate information and systems, and then demand a very high economic ransom to recover the systems.

What can employees do to prevent a cyber attack?

That would make quite a long list, but in short, be vigilant with emails received from unknown senders, or even if they are known, asking for or sharing information that has not been requested, requesting a change of password, etc. SMS messages

you receive with information about purchases that have not been made, or requesting you to provide additional instructions for shipment or similar. And above all, never access websites where safe browsing is not activated (you should always see https://..... in the navigation bar).

We know that cyber security is a crucial issue, so are technical security audits being carried out on systems e.g. In accordance with security standards such as ISO27001?

We do not currently perform audits pursuant to an ISO standard, but we do carry out frequent security analyses called "pentesting" which provides reports on potential vulnerabilities in our systems and our level of security compared to other companies in the sector.





Taste the SUN 

4. Our commitment to sustainable development.

4.1. Our commitment to the SDG.

SanLucar is a global company, the brand with the largest fruit and vegetable range in Germany, Austria and the Netherlands, and has a strong social and environmental responsibility towards its environment. We have therefore implemented the Sustainable Development Goals (SDG) throughout our supply chain since 2018. In this way, we want to make a contribution to the 2030 Agenda and help conserve resources and improve people's lives. We are convinced that the business sector has an enormous opportunity to generate value for society and nature.

We have reviewed the company's existing operations in its value chain and the company's own activity to prioritise the SDG for the Group, We wish to treat our customers, employees and partners with respect and to commit ourselves to the environment and society, and have identified ten fundamental objectives for SanLucar, but we know that we cannot neglect the others.

SDG along the SanLucar supply chain:



Company-wide SDG:



Companies have different ways of implementing the SDG and use these to contribute to meeting the 2030 Agenda. SanLucar promotes innovation to transform the sector, encourages sustainability in its own supply chain and forms partnerships and partnerships with public institutions, other companies in the sector and organisations.

The Group has already taken action with different measures and best practices that help us to support them. Engagement with the SDG provides us as a company with guidelines on issues of innovation, risk prevention and increased trust in our brand.

SDG	Actions we are implementing
2 - Zero hunger	We provide food to families with scarce economic resources and/or who are at risk of social exclusion.
	We hire local labour and suppliers to conduct the company's activities.
	We deploy certain sustainable agricultural practices to minimise our environmental impact, with a view to improving in this respect in future.
3 - Health and wellbeing	We offer financial assistance and scholarships for people in vulnerable communities
	We adapt the workplace for pregnant women
	We conduct risk analysis: identify risks, their cause, the likelihood of an event occurring and the severity of injuries or illnesses arising.
	We promote health in the community: health and wellbeing courses for users of the El Puchero kitchen
	We organise social competitions and events for blood donation among employees in our subsidiaries
4 - Quality education	We offer financial assistance and scholarships for people in vulnerable communities
	We provide training to employees on topics relating to their specialised areas/departments, including training in different languages
	We offer dual training between Spain and Germany, with the potential for employment after graduation.
	We recruit apprentices to train them and improve their technical skills
	We form partnerships with educational institutions to develop community education projects (AHK, FIS, etc.)

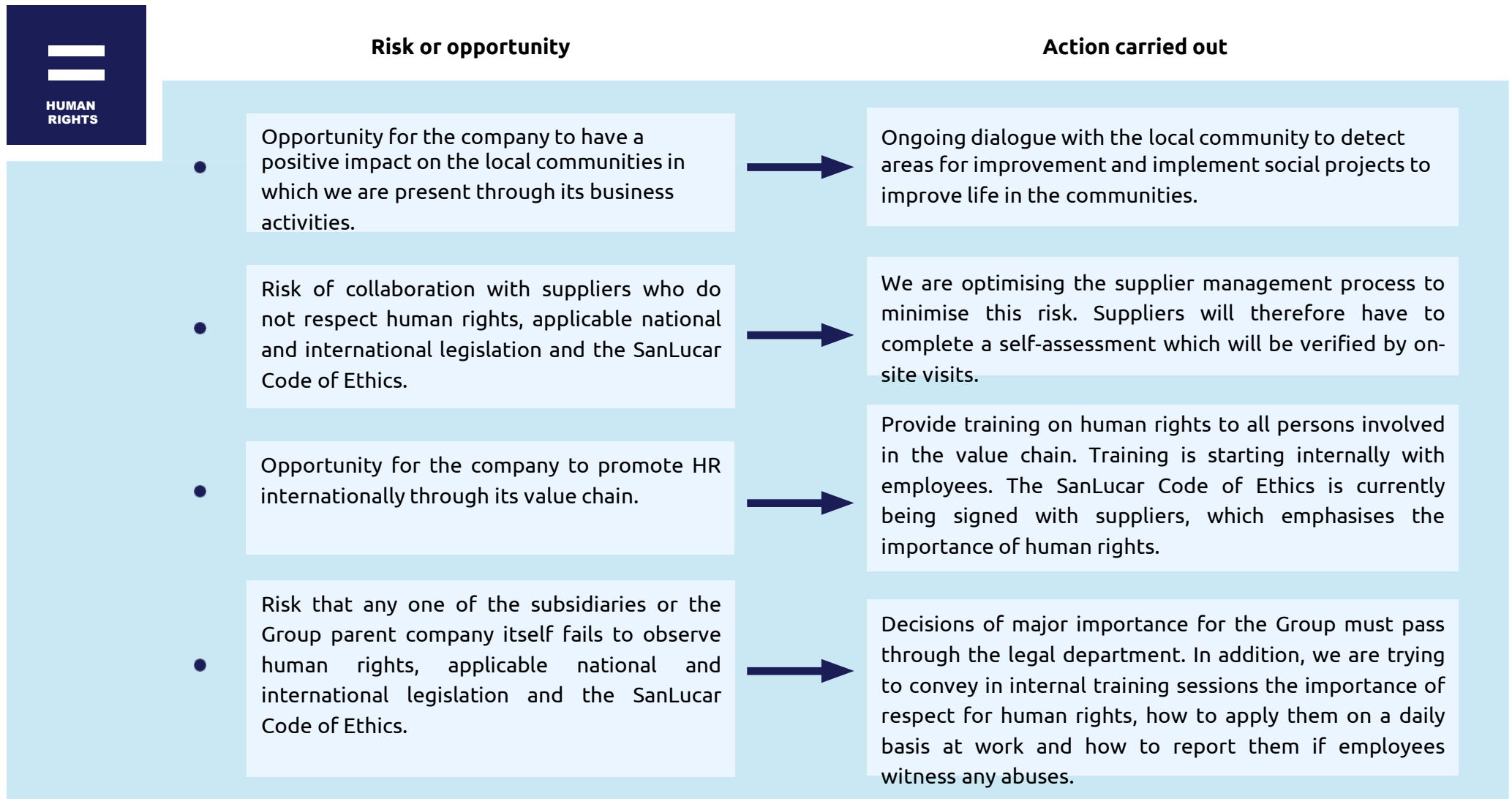
SDG	actions we are implementing
6 - Clean water and sanitation	We use watering programmers and irrigation systems to ensure greater efficiency in water consumption and to reduce water loss.
	We reuse water safely in processes where this is feasible to reduce water consumption
	We ensure that workers have access to safe drinking water and appropriate areas for personal hygiene on the premises.
8 - Good working conditions and economic growth	We promote and provide living wages within normal working hours
	The certifications requested from suppliers are in line with this.
	Job creation with fair working conditions
10 - Reducing inequalities	We create opportunities for workers with low wages to develop their skills and gain access to better job opportunities, both inside and outside the food industry
	We offer educational programmes for people at risk of social exclusion
	We provide decent working conditions and living wages along the value chain
	We establish transparent internal procedures
12 - Responsible production and consumption	For our packaging we use products that are biodegradable, recyclable or reusable
	We publish an annual Sustainability Report
	We design packaging that makes efficient use of natural resources and contributes to reducing food waste

SDG	Actions we are implementing
15 - Life of terrestrial ecosystems	We promote the development and innovation of new technologies that contribute to the protection of ecosystems
	We implement more sustainable agricultural practices, reducing fertilisers, products chemicals, fuels and other raw material by-products and by implementing more sustainable alternatives
16 - Peace, justice and strong institutions	We train employees and suppliers on transparency and human rights
	We maintain a Code of Ethics
	We have procedures to prevent child labour, forced labour, discrimination, etc.
17 - Partnerships to achieve objectives	We identify the SDG that are most relevant to the company's activity, and include the development of these goals in our Sustainability Report
	We implement projects in partnership with other stakeholders to boost growth in developing countries
	We build public-private partnerships

4.2. Our commitment to the Global Compact.

By signing the Global Compact in 2011, SanLucar made a commitment to carry out actions in the Ten Principles of the Global Compact and its four blocks. In 2018 we joined the agri-food working group to do more work on these issues, focusing on our own sector.

We worked on a human rights risk analysis during the 2019/2020 season, and used this analysis to produce the following summary table with risks and opportunities in the four blocks, which has been updated for 2020/2021:





Risk or opportunity

Action carried out

- There are sanctions in place in cases where employees have been forced to join a union through intimidation, arbitrary dismissal or forced relocation.



Human Resources does not even ask employees or trade unions if any of their workers are members of a union. In addition, the Group head office has an employee committee and at least one employee representative in each of the production subsidiaries where the risk is presumed to be higher.

- As a multinational company, there is a risk that recruitment may not comply with the company's values (if the person responsible for recruitment is not objective and favours candidates with specific characteristics such as gender, skin colour, ethnic or social origin, age, etc.).



Human Resources is constantly striving to improve the working environment, and both the Group's head office and its subsidiaries have various certificates to ensure that there are no discriminatory selection processes and that this type of conflict does not exist internally or, if a conflict arises, it is settled in a fair manner.

- Preventing employees from expressing their needs and opinions.



Workers' representatives and the various committees aim to ensure that the needs of employees are heard. In addition, physical and online mailboxes have been made available where any employee can send a message.

- Lack of medical care for employees who are the victims of emergencies in the workplace.



Active co-operation exists with the mutual insurance company at each of the subsidiaries or a doctor hired by the company is available to handle emergencies in the workplace.



Risk or opportunity

Action carried out

- Withholding documents, withholding wages.



Internal policies have been implemented within the Human Resources that prohibit the withholding of documents and wages. This is also confirmed in the various certificates held by the Group.

- Breach of wage obligations stipulated by law.



There are policies within the Human Resources department on the fulfilment of legal obligations at each of the subsidiaries. This is also confirmed in the various certificates held by the Group.

- Risk of having a non-transparent wage system and one that promotes additional overtime work.



There are policies within the Human Resources department on wages and overtime work. This is also confirmed in the various certificates held by the Group. The company committees are also authorised to negotiate with Human Resources on payments of overtime, duty work, weekend work, etc.

- Poor management system for prevention of risks at work.



We have safety officers who are responsible for health and safety at each of the subsidiaries. Furthermore, they all work with external companies to improve the processes of prevention of risks at work.

- Hiring of children below the age specified by current legislation in force in the country.



Before a worker is hired, the date of birth on their identification document must be checked.



Risk or opportunity

Action carried out

- Reduction in biodiversity by using unsuitable pesticides.



Varietal tests are performed to minimise the use of plant-based health products and trials are conducted on organic products or the use of integrated pest control methods.

- Deforestation to obtain a larger growing area.



The Group only farms where previously there was a plot of agricultural land.

- Air pollution caused by emissions from agricultural vehicles and machinery.



The machinery is suitably overhauled and repaired, and is replaced, when necessary, when required by emission criteria.

- Scarcity of water created or worsened by the company's operations.



Efficient watering systems have been implemented, including probes that measure the specific needs of the crop to ensure a more efficient use of water, drip irrigation and the reuse of crop water for subsequent treatment and reuse for watering plants, thus maximising the efficient use of water.

- Poor management or treatment of hazardous waste, organic residues, plastics or any other type of waste product.



We work with authorised managers at all the subsidiary companies to raise awareness among the employees on correct waste separation and classification, and have set up the necessary infrastructures for safe storage of waste products until they are collected by the respective managers.



Risk or opportunity

Action carried out

- Negotiations with third parties are conducted by offering or accepting illicit payments.



All the company's transactions are carried out by bank transfers. To approve a payment, all the processes are managed by computer applications which require certain protocols to be performed to complete the transaction.

- Management's ignorance of the following:
bribes political
donations
charity contributions and sponsorships
gifts to officials



The company is raising awareness of anti-corruption issues among its employees. It is also working on a code of conduct which takes this risk into consideration.



Taste the SUN 

5. Our employees.

Employees are one of the Group's greatest assets. As a multinational group, with companies and employees all over the world and with increasingly international projects, the Group promotes diversity and multiculturalism, with people of different age ranges and nationalities at an international level. For SanLucar diversity is an opportunity to attract human talent, gain a competitive advantage and enrich the corporate culture.

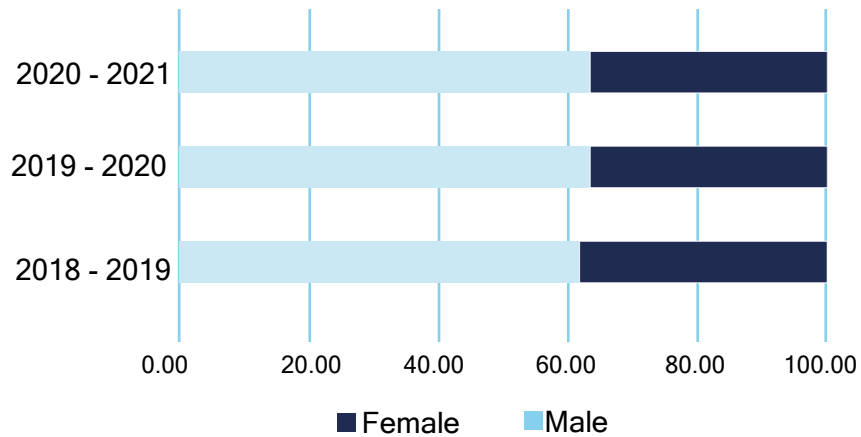
Annex 2 »Table 2. Group companies«, shows the companies with employees that have been used for this financial year. If any companies have not been taken into account for this or previous years, they will be specifically mentioned in the relevant section.

GRI 102-8 / 401-1



5.1. Total number and distribution of employees by gender, age, country and professional classification.

Distribution of employees by gender as a percentage

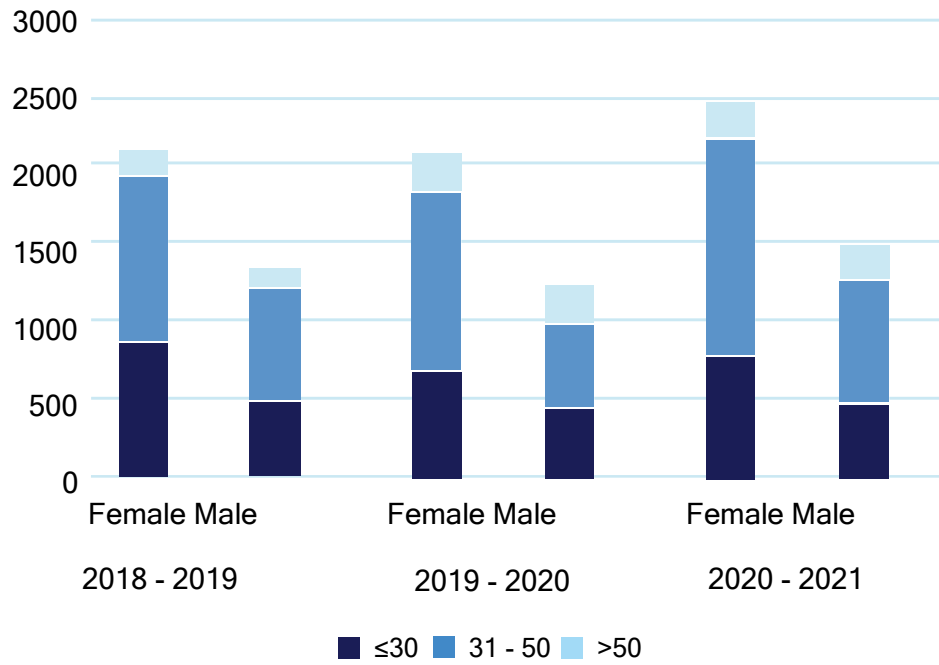


Percentage of employees by gender			
	2018 - 2019	2019 - 2020	2020 - 2021
Female	61.53%	63.57%	63.15%
Male	38.47%	36.57%	36.85%



Our employees

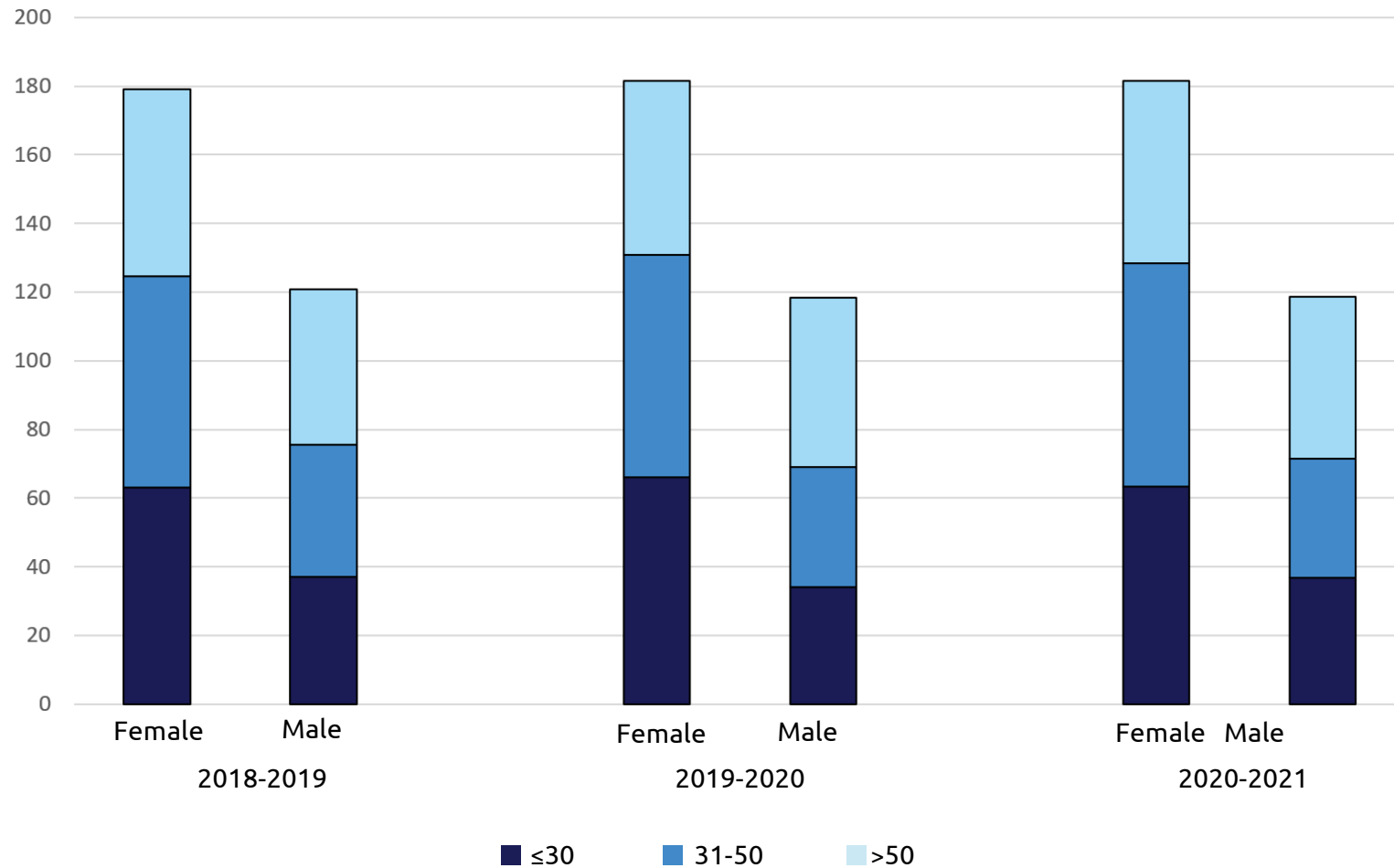
No. of employees by age and sex



No. of employees			
	2018 - 2019	2019 - 2020	2020 - 2021
Female	2068	2040	2487
Male	1293	1169	1451
Total	3361	3209	3938

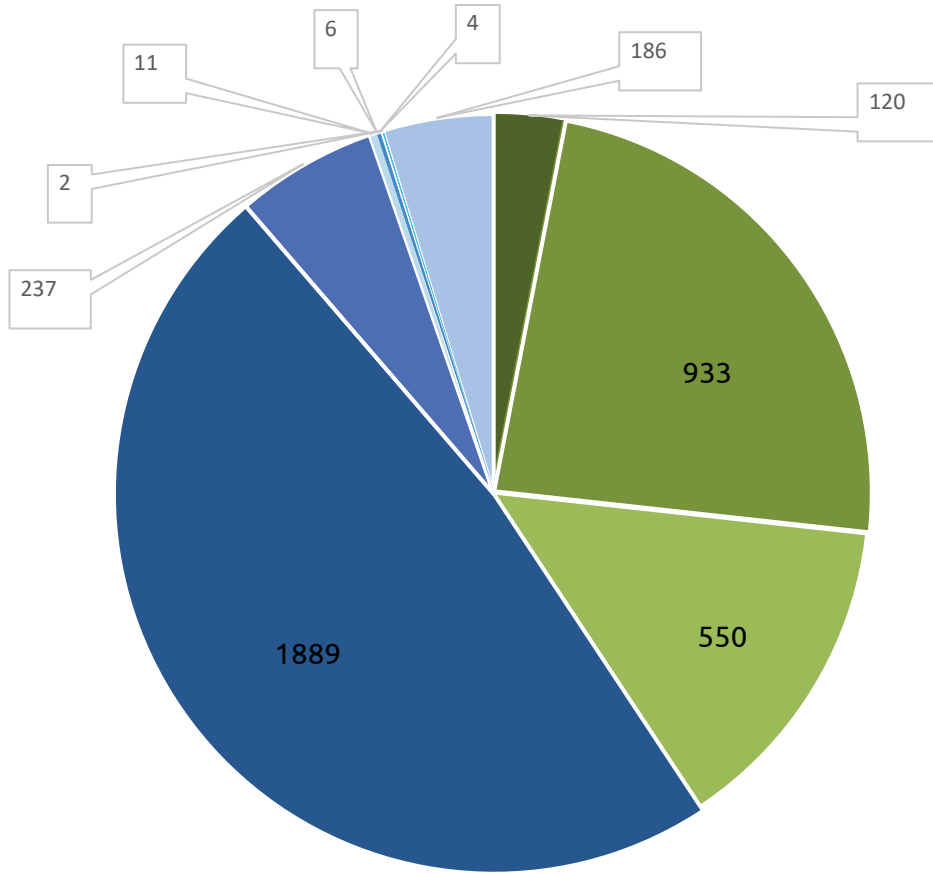
	2018 - 2019			2019 - 2020			2020 - 2021		
	≤30	31-50	>50	≤30	31-50	>50	≤30	31-50	>50
Female	812	1100	156	677	1171	192	787	1456	244
Male	477	686	130	348	634	187	457	778	216
Total	1289	1786	286	1025	1805	379	1244	2234	460

Employees by age and sex as a percentage



	2018 - 2019			2019 - 2020			2020 - 2021		
	≤30	31-50	>50	≤30	31-50	>50	≤30	31-50	>50
Female	63.00%	61.50%	54.50%	66.00%	65.00%	51.00%	63.00%	65.00%	53.00%
Male	37.00%	38.50%	45.50%	34.00%	35.00%	49.00%	37.00%	35.00%	47.00%

Number of employees per country for the 2020/2021 financial year.



Spain Germany Austria Germany Ecuador

South Africa Tunisia Morocco Italy United Arab



- The data for Italy and Morocco was incorporated during the 2019/20 financial year due to the creation of the companies in that year.
- There has been a steady increase in the number of employees from 2018/19 to the current financial year, due to the growth of the Group.

Number of employees per country						
Employees 2018 - 2019			Employees 2019 - 2020		Employees 2020 - 2021	
Country	No.	Percentage of the total	No.	Percentage of the total	No.	Percentage of the total
Spain	400	11.90%	494	15.39%	550	13.97%
Germany	101	3.01%	101	3.15%	120	3.05%
Austria	85	2.53%	151	4.71%	186	4.72%
Holland	8	0.24%	11	0.34%	11	0.28%
Ecuador	275	8.18%	276	8.60%	237	6.02%
South Africa	804	23.92%	327	10.19%	933	23.69%
Tunisia	1688	50.22%	1840	57.34%	1889	47.97%
Morocco	-	-	5	0.16%	6	0.15%
Italy	-	-	2	0.06%	4	0.10%
United Arab Emirates	-	-	2	0.06%	2	0.05%
TOTAL	3361		3209		3938	

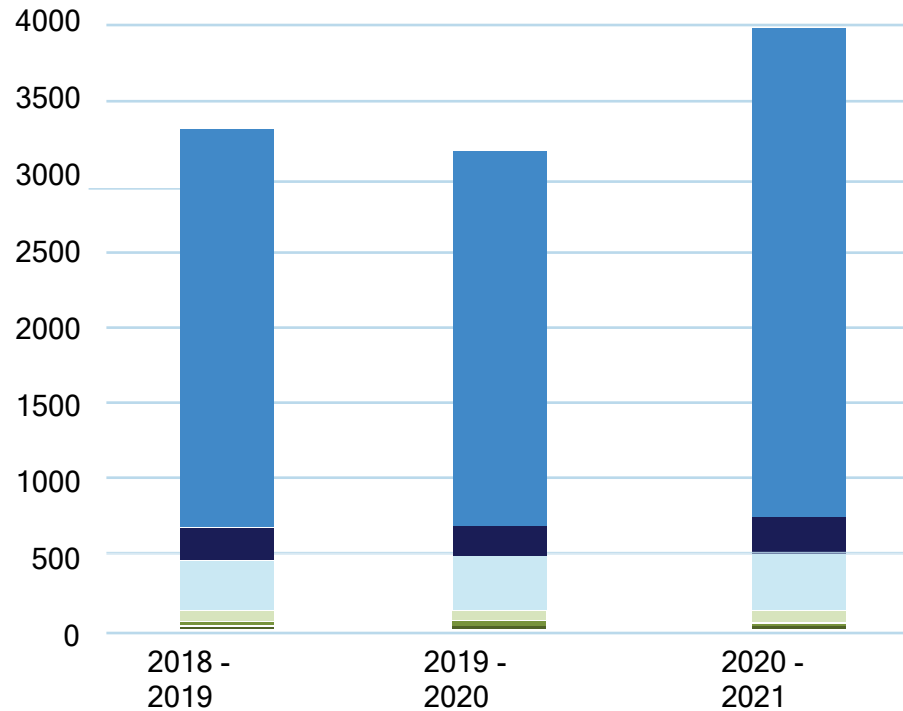
Number of employees per company.

Group company	No. of workers		
	2018 - 2019	2019 - 2020	2020 - 2021
SanLucar Fruit, S.L.U.	262	256	333
Agrícola Uniqua, S.L.U.	131	188	-
Santa María Fruit, S.L.	-	46	-
SanLucar Vertrieb Deutschland GmbH	95	93	113
SanLucar Deutschland GmbH	6	8	7
SanLucar Fruit Import Netherlands BV	8	11	11
SanLucar Obst&Gemüse Handels GmbH	67	73	80
SanLucar Manufaktur GmbH	-	61	93
Fruit to Go, GmbH	1	2	12
Victoria Fruit Handels, GmbH	1	1	1
La Cinquième Saison, S.A.	1250	1329	1459
Les Perles du Desert, S.A.	74	7	10
SanLucar Flor'alia, S.A.	364	504	420
SanLucar Ecuador, S.A.	13	13	13
Lexkingsa, S.A.	120	121	118
Quilziolli, S.A.	142	142	106
SanLucar South Africa, (Pty) Ltd	28	114	8
SanLucar South Africa Citrus (Pty) Ltd	769	205	525
SanLucar South De Hoek (Pty) Ltd*	7	8	400
SanLucar Fruit SL DMCC Branch[1]	-	2	2
The Roetzer Family, S.L.U.	-	4	6
SanLucar Italia, s.r.l.	-	2	3
SanLucar Morocco, SARL	-	5	6
Dehesa de Baños	-	-	211
SanLucar Italia Berries, S.R.L.	-	-	1

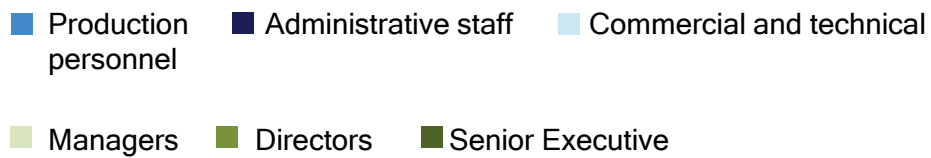
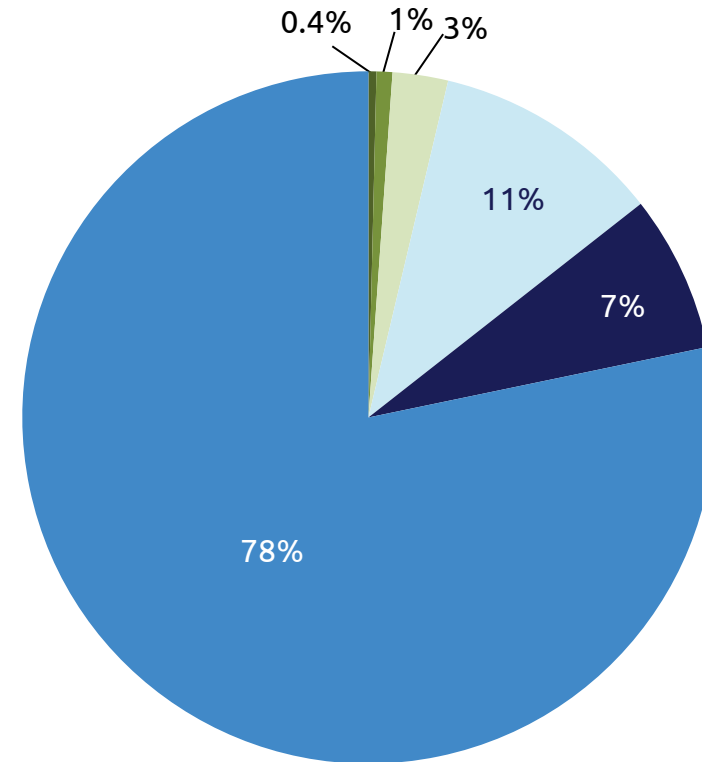


5.2. Number of employees by professional classification.

Number of employees by professional category for the last three financial years.



Number of employees per professional category for the 2020/21 financial year.



Number and percentage of employees by professional category for the last three financial years.

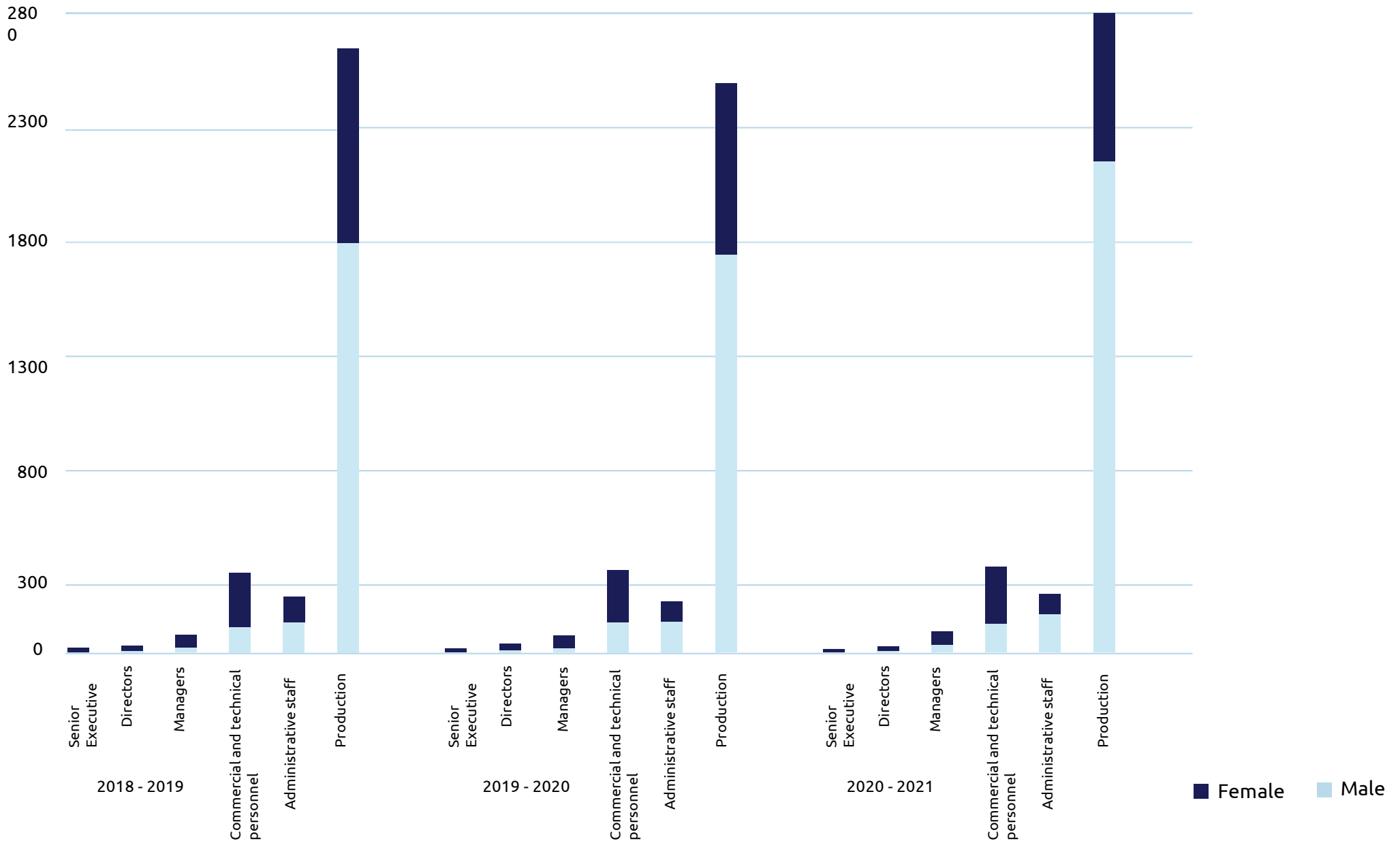
Number of employees			
Professional category	2018-2019	2019-2020	2020-2021
Senior Executive	21	19	13
Director	28	36	26
Manager	78	74	91
Commercial and technical personnel	344	363	376
Administrative staff	234	223	257
Production	2656	2494	3175
Total	3,361	3,209	3,938

Percentage of employees			
Professional category	2018-2019	2019-2020	2020-2021
Senior Executive	0.62%	0.59%	0.33%
Director	0.83%	1.12%	0.66%
Manager	2.32%	2.31%	2.31%
Commercial and technical personnel	10.24%	11.31%	9.55%
Administrative staff	6.96%	6.95%	6.53%
Production	79.02%	77.72%	80.62%
Total	100.00	100.00	100.00



5.3. Distribution of employees by professional category and gender.

Number of employees by professional category and gender for the last three financial years.



Number of employees by professional category and gender for the last three financial years.

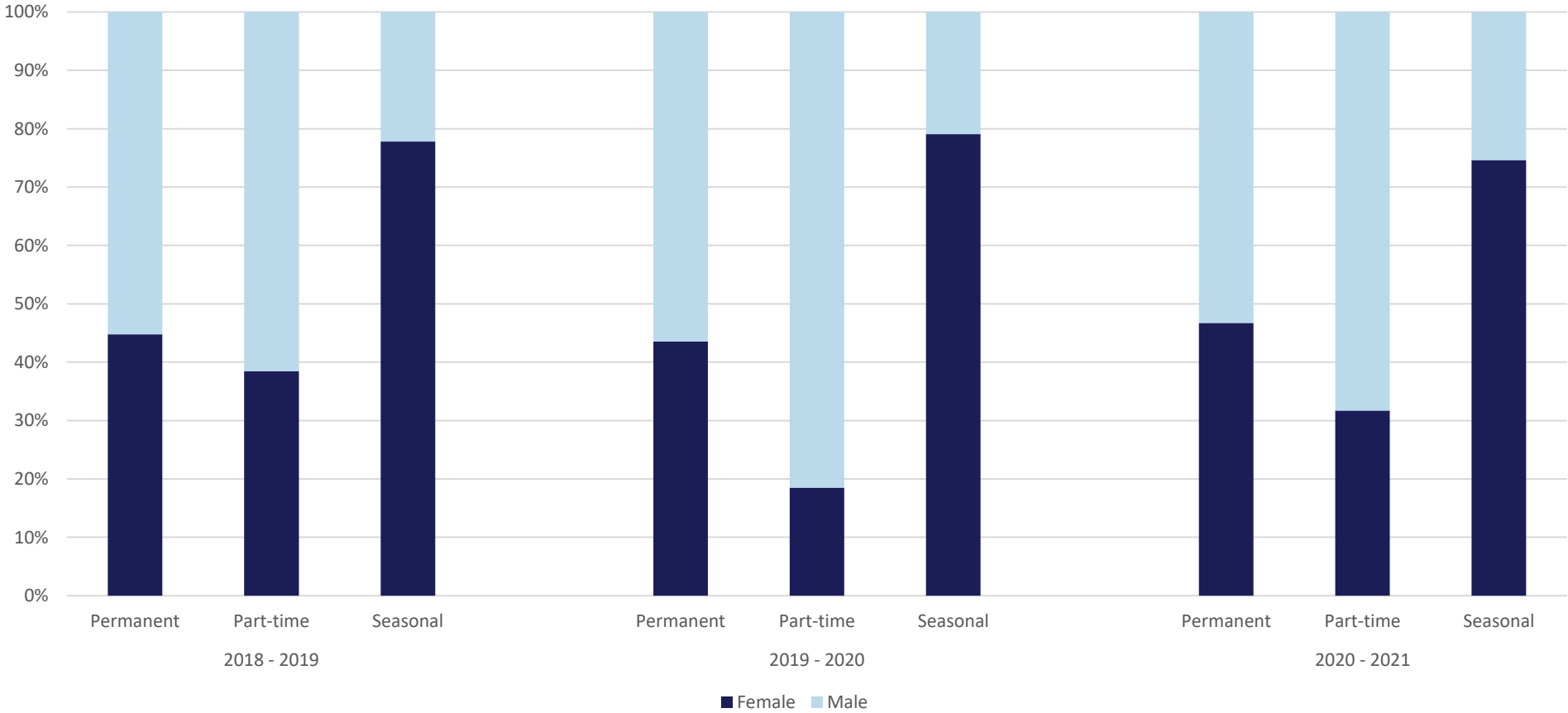
		Female	Male
2018 - 2019	Senior Executive	3	18
	Director	6	22
	Manager	22	55
	Commercial and technical personnel	111	236
	Administrative staff	131	113
	Production	1795	849
2019 - 2020	Senior Executive	2	17
	Director	9	29
	Manager	20	55
	Commercial and technical personnel	132	229
	Administrative staff	135	88
	Production	1742	751
2020 - 2021	Senior Executive	1	12
	Director	6	20
	Manager	32	59
	Commercial and technical personnel	126	250
	Administrative staff	170	87
	Production	2152	1023

The graph above shows a comparison between the distribution of professional categories between men and women. The graph shows how the distribution of women is very high in the lower professional categories and men are more present in the higher professional categories. The trend has not changed in the years under review.

Our employees



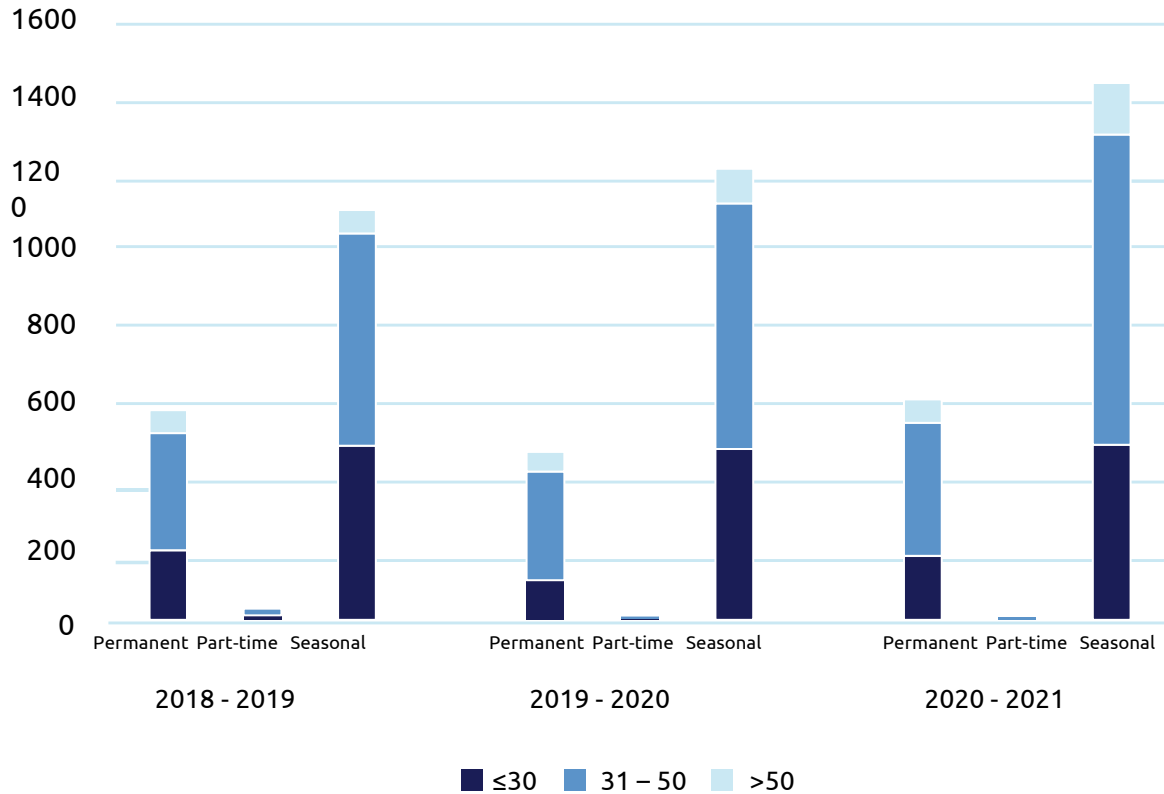
Distribution of employees by type of contract and gender.



As shown in the graph above, the number of women employed on temporary contracts is more than 50% higher than for men. Similarly, the number of men employed part-time in the years studied is between 62% and 69%.

Breakdown by type of contract and age group.

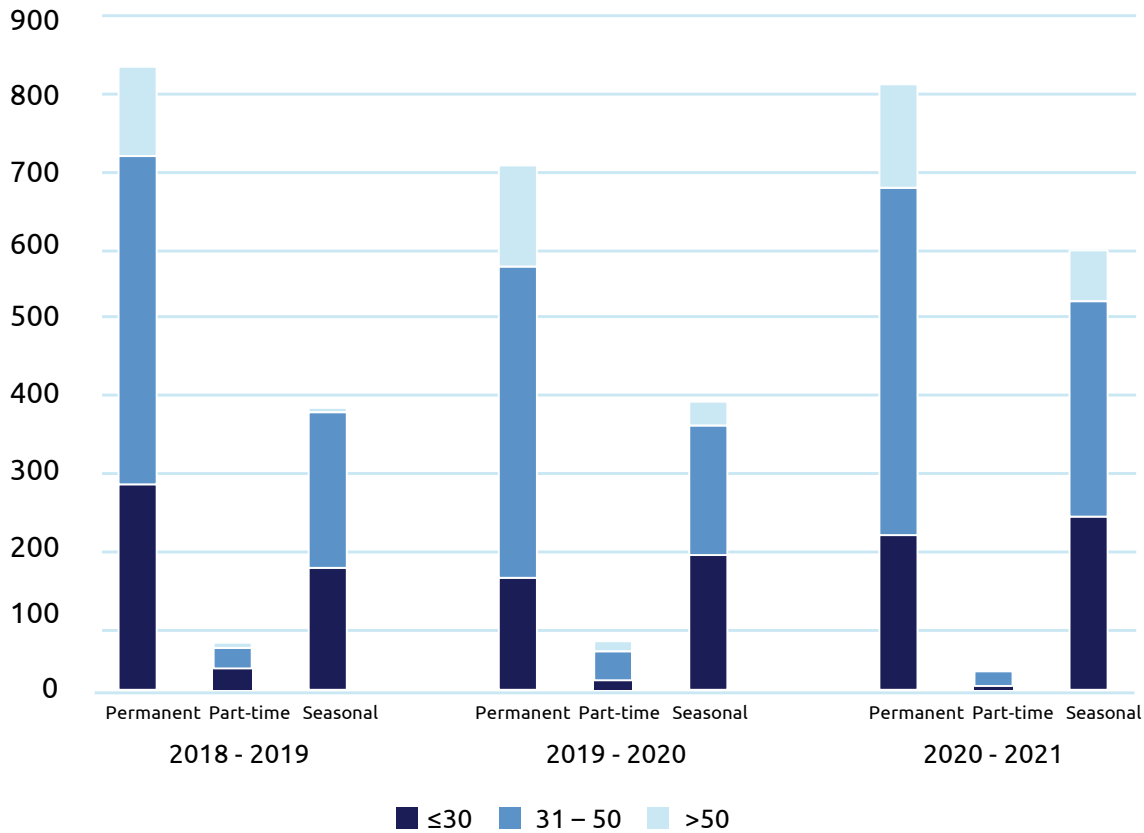
Number of women by type of contract and age group.



- Seasonal workers are persons who work only during the harvesting period of a certain fruit or plant, i.e. persons who work on a temporary basis.
- The data for South African companies for years prior to 2020/21 do not reflect the number of seasonal workers, as these were hired by temporary employment agencies and were not included in the data collection.



Number of men by type of contract and age group.



The graphs show that the proportion of male workers over 50 years of age is higher than the proportion of female workers of the same age for all types of contracts.



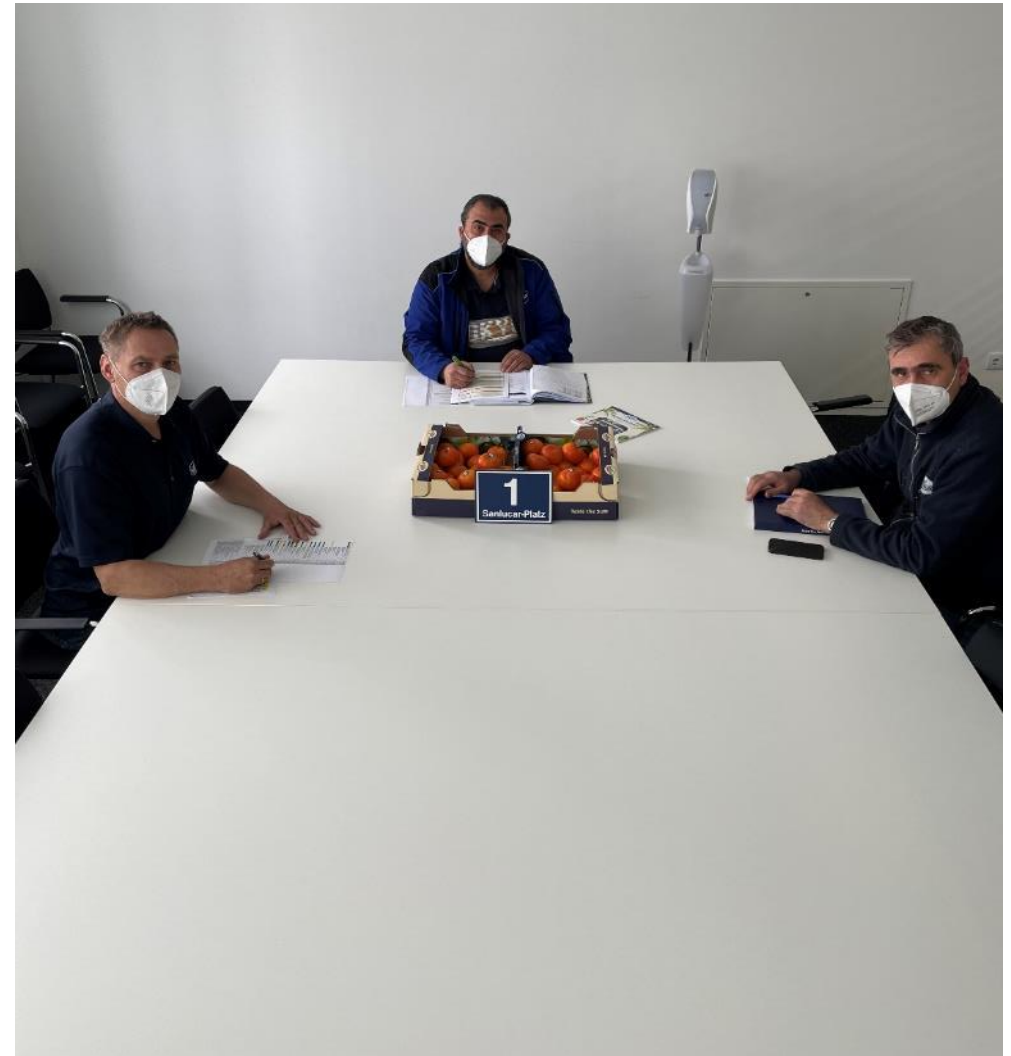
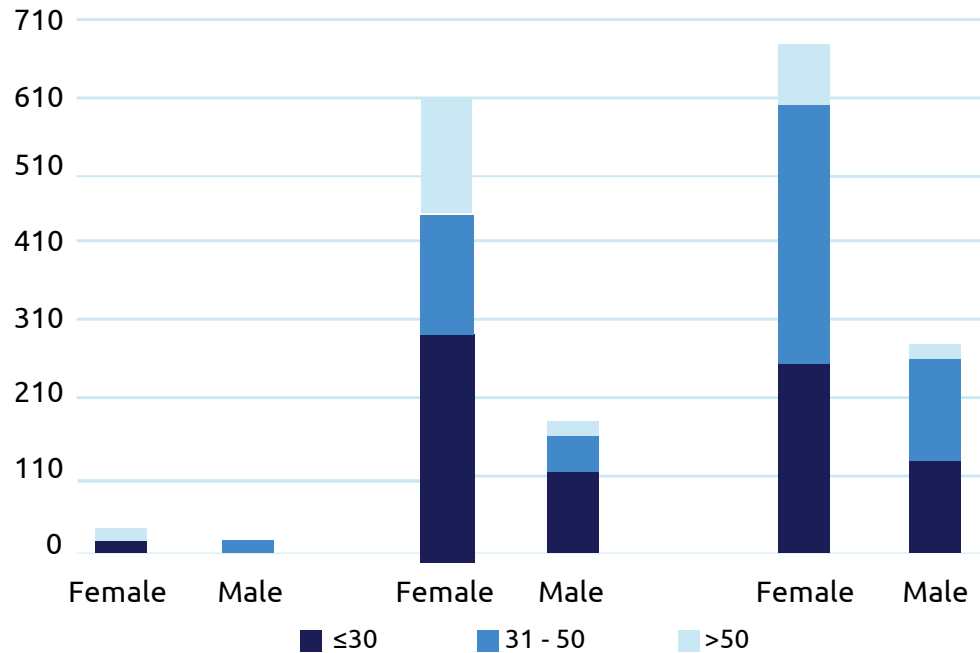
Summary table on the number of employees by type of contract and professional category.

Female	2018 - 2019			2019 - 2020			2020 - 2021		
	Type of contract			Type of contract			Type of contract		
	Permanent	Part-time	Seasonal	Permanent	Part-time	Seasonal	Permanent	Part-time	Seasonal
Senior Executives	3	0	0	2	0	0	1	0	0
Directors	6	0	0	9	0	0	6	0	0
Managers	22	0	0	20	0	0	32	0	0
Commercial and technical personnel	90	3	18	115	0	17	110	0	29
Administrative staff	111	5	15	115	4	16	127	5	29
Production	454	32	1309	288	11	1443	439	8	1699
Total Female	686	40	1342	549	15	1476	715	13	1757

Male	2018 - 2019			2019 - 2020			2020 - 2021		
	Type of contract			Type of contract			Type of contract		
	Permanent	Part-time	Seasonal	Permanent	Part-time	Seasonal	Permanent	Part-time	Seasonal
Senior Executives	18	0	0	17	0	0	10	0	1
Directors	22	0	0	28	0	1	18	0	0
Managers	54	0	1	55	0	0	65	0	0
Commercial and technical personnel	209	1	26	202	0	27	219	1	19
Administrative staff	100	3	10	78	1	9	75	3	17
Production	443	60	346	332	65	354	429	24	572
Total Male	846	64	383	712	66	391	816	28	609

5.4. Dismissals by sex, age and professional classification.

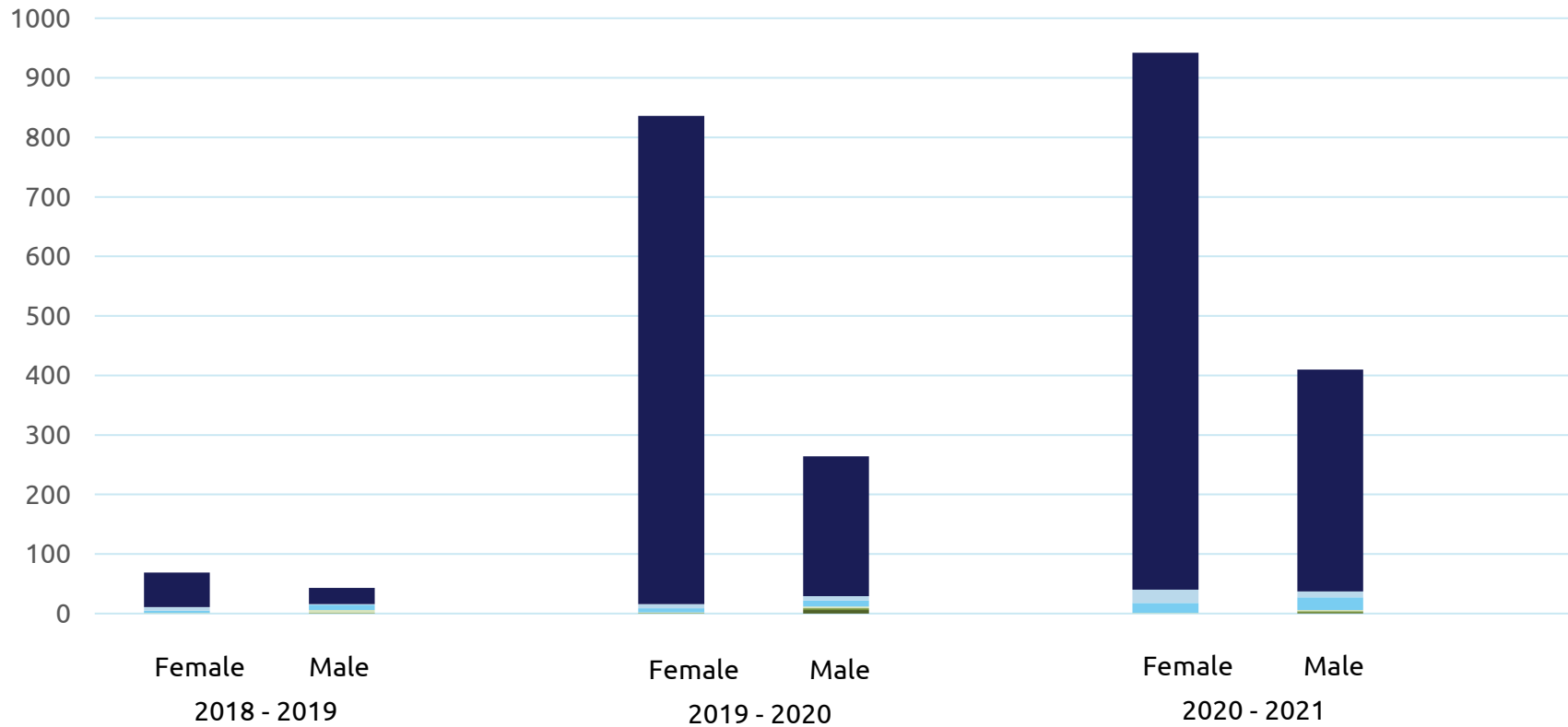
Number of redundancies by age and gender for the financial year 2020/2021.



	2018 - 2019			2019 - 2020			2020 - 2021		
	≤30	31 - 50	>50	≤30	31 - 50	>50	≤30	31 - 50	>50
Female	38	26	5	415	216	205	293	323	70
Male	10	27	6	162	70	32	126	63	10

The number of dismissals among women is higher than among men, this is due to the fact that there is a higher proportion of women among the temporary seasonal modalities (as seen above), triggering the number of dismissals.

Number of dismissals by professional category and gender for the last three years.

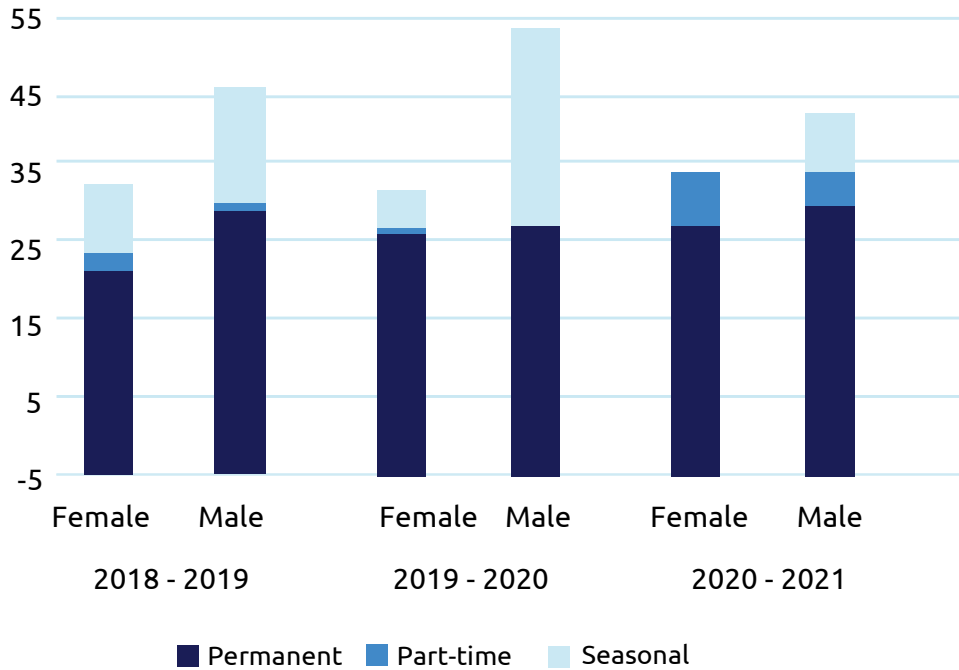


- Production
- Administrative staff
- Commercial and technical
- personnel Managers
- Directors
- Senior Executive

	2018 - 2019		2019 - 2020		2020 - 2021	
	Female	Male	Female	Male	Female	Male
Senior Executives	0	0	0	6	0	1
Directors	0	1	1	3	0	3
Managers	1	5	1	3	1	2
Commercial and technical personnel	4	9	7	10	17	21
Administrative staff	6	1	7	7	22	10
Production	58	27	820	235	902	372
Total	69	43	836	264	942	409

5.5. Voluntary redundancies by type of contract and gender.

Number of voluntary redundancies by type of contract and gender.



Information from South African companies for 2018/2019 and 2019/20 is not included because their database did not distinguish between types of departure from the company.

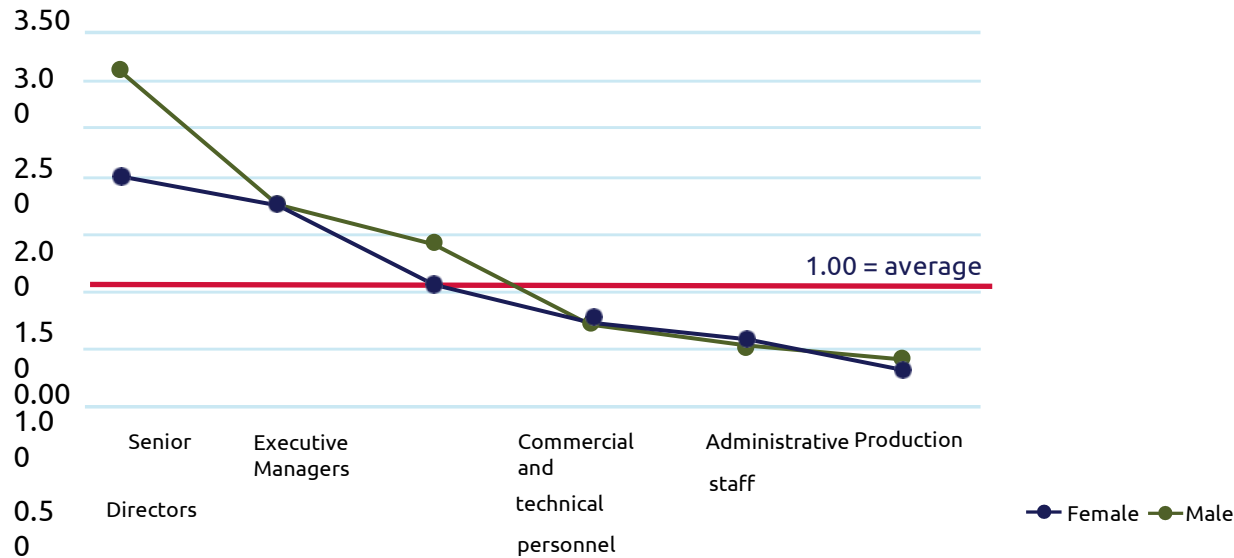
Voluntary resignations by type of contract and gender									
	2018 - 2019			2019- 2020			2020 - 2021		
	Permanent	Part-time	Seasonal	Permanent	Part-time	Seasonal	Permanent	Part-time	Seasonal
Female	22	2	8	25	1	4	26	8	0
Male	30	1	16	26	0	27	28	4	12

5.6. Total average pay of employees.

The average pay per employee in the years under review is:

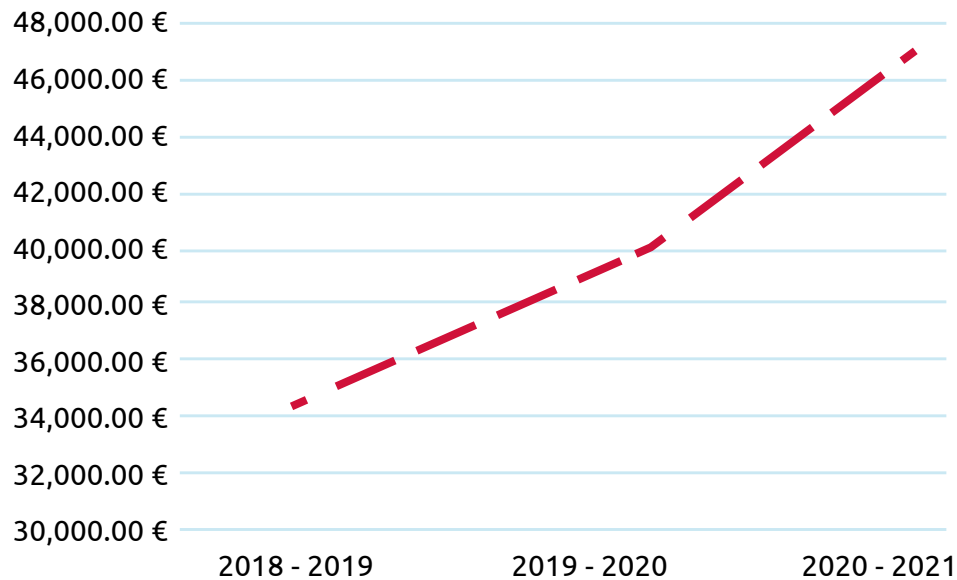
	2018 - 2019	2019 - 2020	2020 - 2021
Pay (€)	34,386.12	39,984.52	46,873.57

Average pay for men and women by professional category for the 2020/2021 financial year.



Average remuneration by professional category, age and gender									
	< 30			31 - 50			> 50		
	Female	Male	Gap	Female	Male	Gap	Female	Male	Gap
Senior Executive				2.15	2.99	-0.28		3.36	
Director				1.86	1.57	0.19		2.16	
Managers				1.11	1.36	-0.19	1.05	1.59	-0.34
Commercial and technical personnel	0.51	0.54	-0.06	0.62	0.66	-0.05	0.98	0.84	0.17
Administrative staff	0.44	0.47	-0.07	0.52	0.46	0.12	0.65	0.48	0.37
Production	0.24	0.29	-0.16	0.23	0.34	-0.32	0.24	0.38	-0.38

Average overall salary for the last three financial years.



Remuneration of the board of directors.

For the financial years 2018/2019, 2019/2020 and 2020/2021, the composition of the board of directors is as stipulated in the notes to the consolidated financial statements of the Group for each financial year. The sole administrator of Mamaritz, S.L.U. or specific employees of the Group are authorised personnel, beneficiaries or have the authority to dispose of bank accounts of the subsidiary companies, whether national or resident abroad. These accounts and entities are fully identified by the respective treasury managers of the Group companies.

5.7. Policies for the right to disconnect from work.

The Group's collective bargaining agreements include various social benefits such as flexible working hours in its offices, intensive working hours in the summer months, etc.

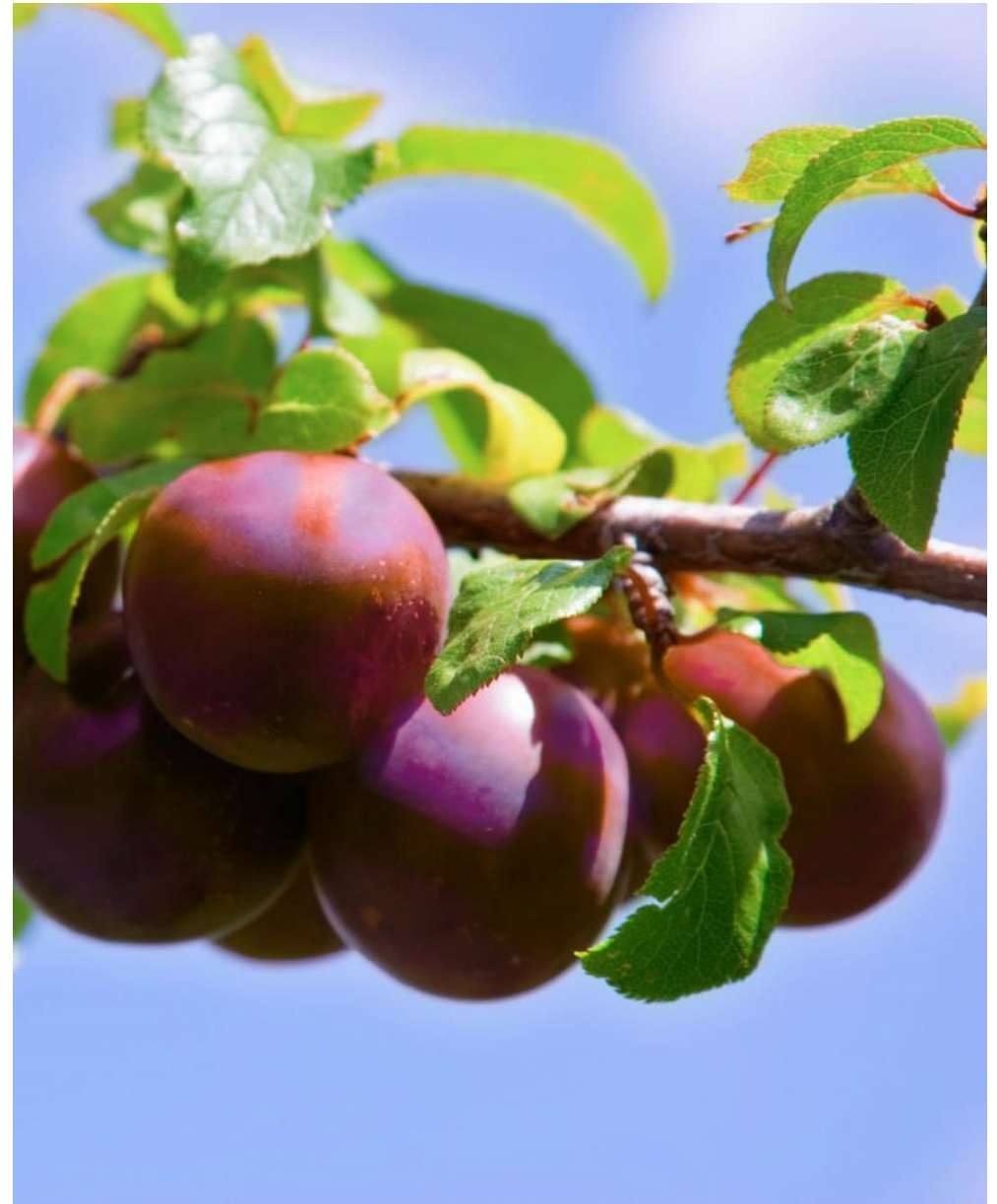


5.8. Universal accessibility for persons with disabilities.

At 30 June 2021, the Group has 16 employees with a degree of disability equal to or greater than 33%.

Average all ages	Female	Male
Germany	-	1
Austria	1	1
Ecuador	1	3
Spain	3	4
Tunisia	-	2
Total	5	11

For ten years SanLucar has been working with local non-profit organisations in Tunisia that support people with disabilities. For example, the non-governmental organisation ATAS in El Hamma manufactures the hooks and twine that help our tomatoes grow more effectively towards the sun. AGIM is an NGO and the SanLucar logo is embroidered onto our work clothes at their workshop. The organisation UTAIM operates several workshops for persons with disabilities: their laundry service handles all our washing tasks. Persons with disabilities in Tunisia find it particularly difficult to find a job and to be respected as part of society.



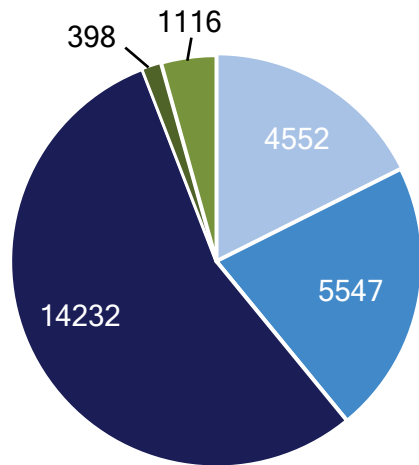
5.9. Personal development.

The Group's success depends on the skills and professionalism of its employees. We therefore strive to develop all employees to create high levels of motivation and performance and to enable them to realise their full potential.

Annual training plans for employees are implemented in each subsidiary, which are adapted to the needs of each employee, because we believe in personal and professional development, along with continuous learning.

The total number of participants in the same session was added up and multiplied by the number of hours to obtain the total number of hours for each of the training sessions to calculate the total training hours.

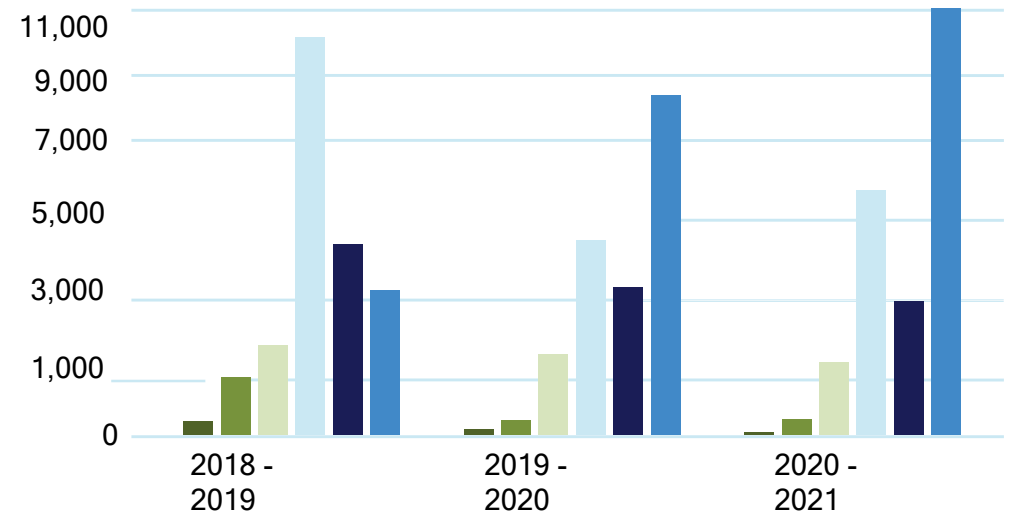
Training hours per topic, 2020/2021 season



- Job-related, continuous training
- Languages
- Occupational health, hygiene and safety
- Policies, protocols and certifications
- Environmental issues

With regard to health and safety at work, the company has always been committed to a safe environment and continues to work to increase employee awareness through continuous training courses.

At SanLucar Puzol, all employees can take language classes to help them perform their work tasks more effectively. Languages offered include Spanish, English, German, French and German.



- Production
- Administrative staff
- Commercial and technical personnel
- Managers
- Directors
- Senior Executive

Scholarship programmes in Spain.

Since 2008, SanLucar has been offering interns the opportunity to work at our offices in Puzol. These internships are offered in approximately 15 different areas and last for six months on a full-time basis. During this time, the interns are able to gain work experience and develop in their personal and professional spheres

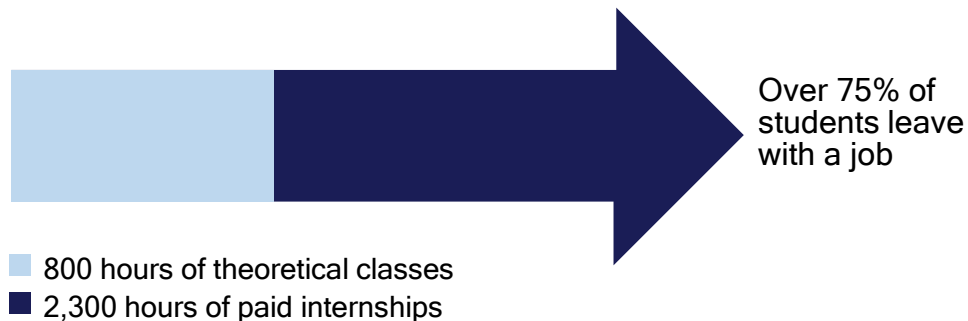
It is extremely important to provide support to interns, which is why the intern receives monitoring, feedback and a final assessment by the supervisor of the intern's department and the person responsible for Human Resources midway through and at the end of the internship. In addition, they receive monthly remuneration and holiday entitlement. To date, approx. 400 scholarship holders have participated in the programme, approximately 35% annually and, based on the figures of the last four years, 26% remain at SanLucar after their internship and go on to complete their studies.



Dual training in Germany and Spain.

This is now the third consecutive year that SanLucar has offered dual training for technical managers in foreign and wholesale trade in collaboration with FEDA Madrid German Business School. The dual training prepares young people to enter the world of work, and it is important to note that the employment rate of students by SanLucar after they have completed the course, is close to 80%.

Dual training is a system that combines theory with internships in external companies. Theoretical modules comprise 35% of the course, with 800 teaching hours provided by FEDA Madrid and several active professionals from the SanLucar Academy. Once the theoretical part has been completed, students commence their internship, which will cover the remaining 65% of the training period. The 2,300 hours of paid internships are carried out at SanLucar or at one of the five other companies that have joined the initiative: EDEKA Fruchtkontor, Landgard, Primafrio, TEDI and Transfesa.



Dual training has been very successful from the outset. A total of 22 students are currently studying, twelve of whom will pursue their internships at SanLucar. Once they complete the training, they will obtain a qualification recognised in Germany and Spain, as it is certified by the German Chamber of Commerce for Spain, AHK, and the course theory has the seal of the German School of Dual Education FEDA Madrid.

GRI 404-1

If you would like more details you can read the interview below with Mandy Zwahlen, Sales Training Manager, and the person responsible for dual vocational training at SanLucar.

What is dual training?

Dual training is an important apprenticeship format in Germany. Training is provided in blocks, alternating theory (35%) and practice (65%), which takes place in the participating companies. After two years of dual training, students obtain a diploma recognised by the German Chamber of Commerce (AHK) and the Spanish FEDA (Madrid German Business School) »Technical managers in foreign and wholesale trade«.

How did the idea arise in SanLucar, and how long has the company offered dual training?

It is extremely difficult to find suitable and well-trained staff in our sector. SanLucar has been committed to training its own employees from very early on. With this dual training model, we have now found a formula to enable us to create our own talent pool. With the collaboration of more companies in the sector, in a few years we'll gain in terms of the quality of employable workers in the sector. The first to graduate with this qualification was the class of 2019 and more graduates have passed in 2021.

SanLucar cooperates with FEDA; how does this collaboration work?

SanLucar and FEDA Madrid work closely together to roll out this new training modality in Spain. FEDA Madrid is the expert in theoretical education within the dual framework in Spain, and has over 40 years of experience. FEDA has therefore up a division at the SanLucar premises for this project to provide theoretical courses. We collaborate with SanLucar and FEDA Madrid within this theoretical framework to adapt the subject matter to the future world of work.



Full name:

Mandy Zwahlen

Position:

Training Manager and person responsible for dual vocational training at SanLucar. - Valencia.

What kind of training course is offered at SanLucar and how many students are there in the programme?

FEDA Madrid offers a wide range of training courses. Here in the Valencia office we run the course for technical managers in foreign and wholesale trade. We have five students for the 2020/22 class, and six for 2021/23. We have employed four trainees at SanLucar in different departments (Sales, Purchasing, Logistics, HR) from the first class of 2019/20.

What are the requirements for students to apply for dual training?

Students must have a minimum level of B1/2 in German and have completed the baccalaureate. They must be between 18 and 25 years old. In addition, it is very important that they want to work in the fruit and vegetable trade with a desire to feed the world. The application phase for the new selections will be from January 2022, when we receive the CVs. We will conduct personal interviews and an *assessment centre* to select the most suitable candidates for SanLucar.

What is your responsibility within this programme?

After 30 years of working in sales and having supervised interns for the past two years as a trainee instructor, I will be responsible for dual training at SanLucar from July 2021. I will therefore serve as the contact person for students, tutors and FEDA Madrid. As the supervisor of the interns, my task is to help them achieve their full potential and, I am able to exploit my years of experience in the commercial sector, to guide them on their way to success. We also work closely with the AHK (German Chamber of Commerce) where our colleague Nils ***

Ahmad is part of the dual training council and with FEDA Madrid, where he sits on the board of directors to develop dual concepts at national level.

What is the benefit of dual training for both students and employers?

The interns are paid for their training from the first day and experience the real life of the worker from day one. The dual education and training programme makes the students more employable in the labour market, and is also an official German qualification. Her curriculum includes three languages (German, Spanish and English). This represents an important future investment for SanLucar. This gives us the opportunity to provide instruction to our future employees who, after two years of training, have seen a large part of the all the various departments in the company, and have a much broader overview all the different departments than any other employee who joins a specific department.

These employees will have a inter-disciplinary and, above all, specialised knowledge of our company SanLucar.



5.10. Occupational health and safety.

SanLucar attaches great importance to health and safety at work, which is in accordance with the respective national legislation at all times. We also attempt to improve health and safety wherever possible, notably in countries where the Group has production subsidiaries.

An annual medical examination is carried out at the company's own premises in the subsidiaries in Spain, Ecuador, South Africa and Tunisia. The examination consists of a medical examination and blood and urine tests, both of which are carried out during the same appointment.

It is compulsory for:

- New employees.
- Positions in which involve journeys by driving a vehicle during their working day.
- Quality technicians.
- Lab technicians.
- Warehouse and maintenance department.

In addition, the medical examination must be renewed in the following cases:

- Persons over 40 years of age if their last company medical examination took place two years or more ago.
- All other cases not included in the above: if 4 years or more have passed since the last medical examination carried out in the company.

No medical examination is carried out in Morocco, as this is not required by national legislation for the type of work carried out. However, in Holland the medical examination is voluntary and no employees have received a medical examination to date.

In Italy, the examination is compulsory when a new employee joins the company and must be renewed every two years for office, office-driver and quality technician positions. If workers have had a previous medical examination with another company for the same occupational health and safety position/same risks, the validity of which has not expired, it will be accepted as valid and another examination will be conducted when this period has expired.



GRI 403-2

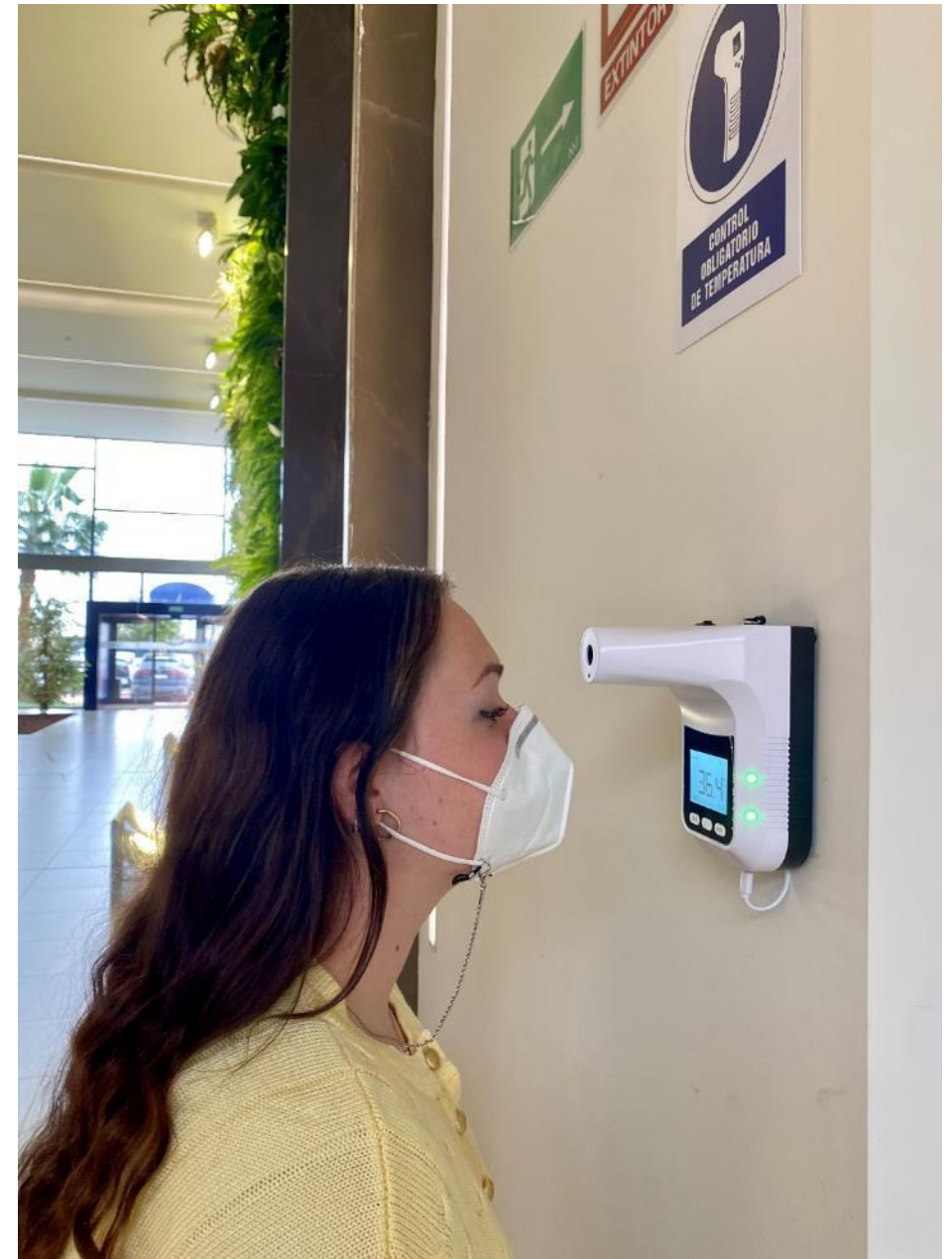


COVID-19 measures.

During the COVID-19 pandemic, remote working was encouraged wherever possible to prevent infection by and the transmission of the virus among employees. A committee was set up at our head offices in Spain and Germany to coordinate safety measures and to monitor the pandemic. Responsible persons were identified in the other countries who fulfilled these same functions.

In the case of the Vall d'Uixó warehouse, the morning and afternoon shifts were separated to minimise contact between employees and the facilities were disinfected during the midday break. The offices are disinfected daily and the ventilation and air renewal in the offices has been improved. Sanitising gel has also been made available to all workers near the shared facilities and a series of mandatory rules have been communicated. Infrared thermometers have been installed at the entrance to the offices in Puzol and the warehouse in Vall d'Uixó, which are available to all persons entering the facilities. FFP2 masks are also provided every day for entry to these workplaces.

Finally, workers have flexibility as to when they start and finish the working day so they can avoid the busy commuting times in the morning or afternoon.



Prevention

In terms of occupational health and safety, the Group companies have an OHS department or persons responsible for OHS in their companies. The following measures have been implemented to ensure the correct application of the preventative measures for the various groups of workers:

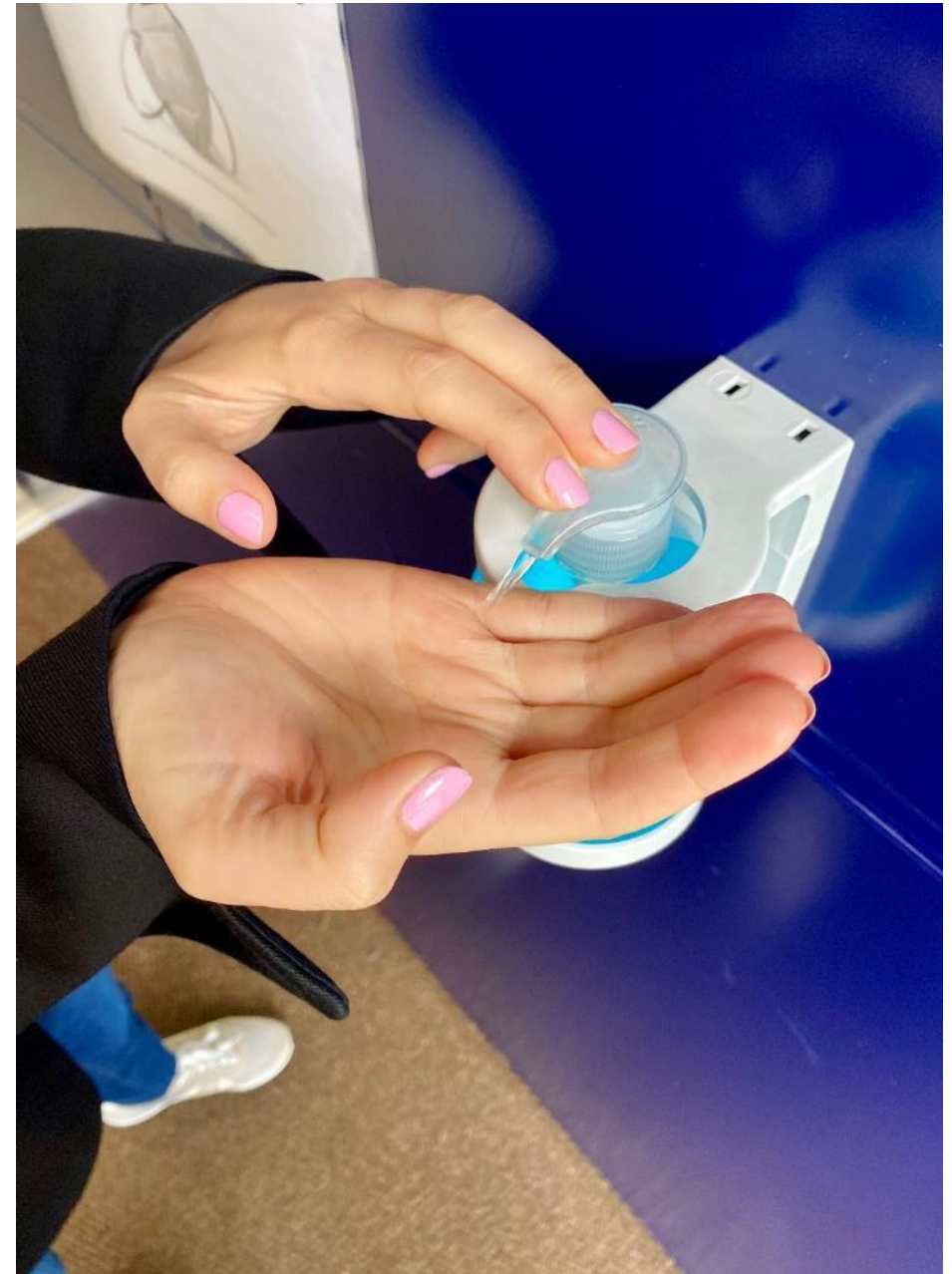
- All Group companies have a health and safety policy adapted to the activity carried out in each company.
- We maintain statistics of accidents and their causes, which allows us to update and improve our preventative measures.
- Producing subsidiaries also have a company doctor or nurse among the personnel.
- Finally, the marketing subsidiaries, where the main activity takes place in offices and logistics centres, are linked to external companies who are specialists in occupational risk prevention.

The Group's Occupational Risk Prevention department coordinates all these policies and also provides the various health and safety training courses. The training is based on the occupational risks identified for every activity, establishment and work tasks of each worker.

Finally, it should be noted that this department also forms part of and coordinates the Health and Safety Committee indicated below.

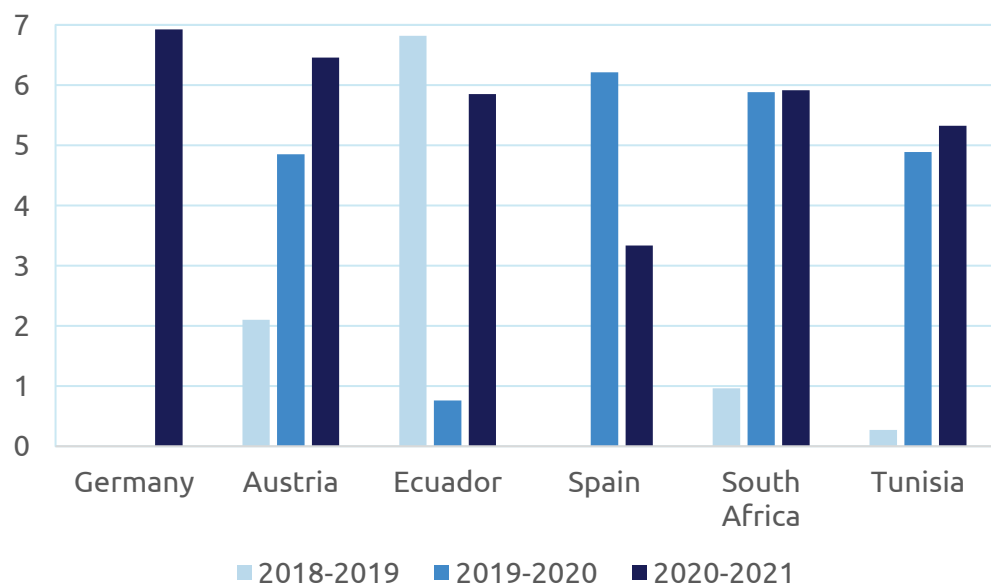
Accidents in the workplace

The Occupational Risk Prevention department is responsible for evaluating and analysing the indicators of occupational accidents, as these indicators are the basis for implementing preventive and corrective measures.



Accident rate by country and Group for the last three years.

With regard to occupational accidents, the Group's main objective is to maintain the accident rate at the lowest level possible. It is therefore essential to have an occupational health and safety management system in all the companies and to reduce work accidents as far as possible.

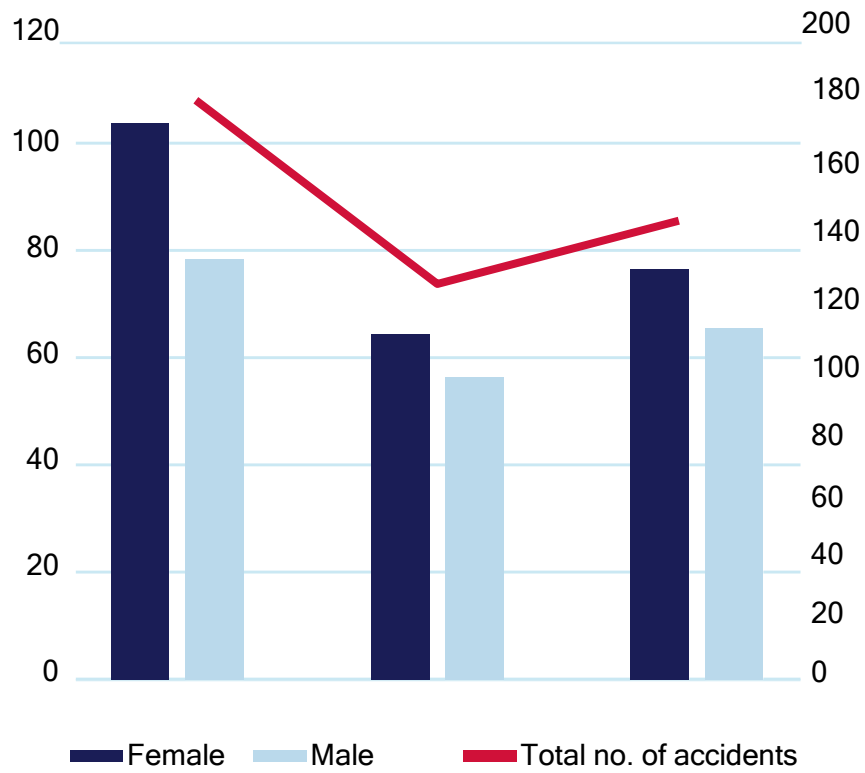


The accident index was calculated using the following formula:
 $\text{no. accidents} \div \text{no. hours worked} \times 200,000$.

For the 2018/2019 financial year, companies from Austria, Ecuador, South Africa and Tunisia were taken into account in the accident rate. For the financial year 2019/2020, companies with employees from Austria, Ecuador, Spain, South Africa and Tunisia were taken into account. For the financial year 2020/2021, the same companies were taken into account as for 2019/2020, plus Germany.

	Accident rate (average)		
	2018/19	2019/20	2020/21
Female	2.22	3.33	4.68
Male	2.85	6.76	6.72
Total	2.54	4.56	5.70

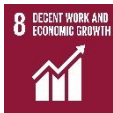
No. of work accidents with injuries by gender and Group.



	No. of occupational illnesses			No. of fatalities			Days of absence		
	2018/19	2019/20	2020/21	2018/19	2019/20	2020/21	2018/19	2019/20	2020/21
Female	0	0	0	0	0	0	433	2814	3541
Male	0	0	0	1	6	1	1042	5294	5126
Total	0	0	0	1	6	1	1475	8108	8667

For occupational illnesses, fatalities and days of absence, the companies belonging to Austria, Germany, Ecuador, Spain, South Africa and Tunisia were taken into account for the financial year 2018/2019.

For the 2019/2020 and 2020/2021 financial years, companies from Austria, Germany, Ecuador, United Arab Emirates, Spain, Italy, Morocco, South Africa and Tunisia were taken into account.



GRI 403-2



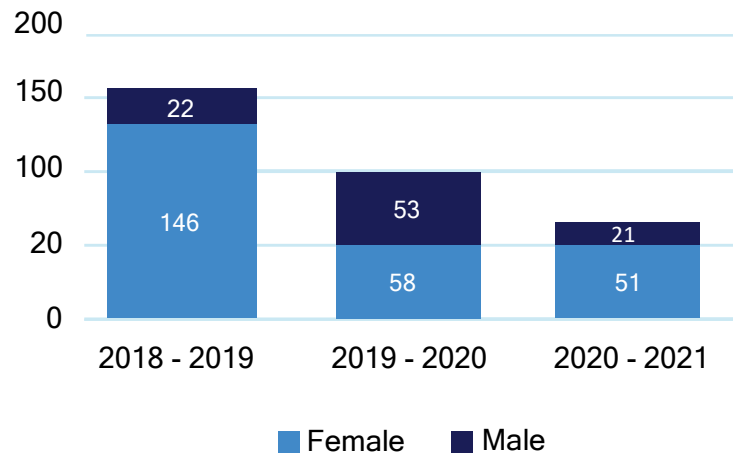
5.11. Work-life balance.

There is a widespread belief in the Group that employees should achieve a good balance between their professional and private lives. Accordingly, the necessary mechanisms have been implemented to facilitate this 'work-life balance'. In this same spirit, the Group supports flexible working conditions and encourages its employees to have interests and activities they enjoy outside their professional life.

The first objective has been to offer all employees whose work tasks allow, the option and the tools of new technologies to work from home and thus reconcile work and family life to ensure that the work-life balance is a reality.

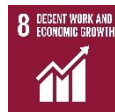
We comply with local labour regulations in all the other companies and, where possible, attempt to improve on them whenever possible.

Total number of employees who took maternity and paternity leave in the last three financial years.



Female	Employees who took maternity leave								
	2018 - 2019			2019 - 2020			2020 - 2021		
	≤30	31 - 50	>50	≤30	31 - 50	>50	≤30	31 - 50	>50
Senior Executive	0	0	0	0	0	0	0	0	0
Directors	0	0	0	0	0	0	0	0	0
Managers	1	1	0	1	2	0	0	1	0
Commercial and technical personnel	0	3	0	2	7	0	3	6	0
Administrative staff	1	9	0	2	3	0	2	5	0
Production	67	59	5	0	35	0	7	27	0

Male	Employees who took paternity leave								
	2018 - 2019			2019 - 2020			2020 - 2021		
	≤30	31 - 50	>50	≤30	31 - 50	>50	≤30	31 - 50	>50
Senior Executive	0	0	0	0	0	0	0	0	0
Directors	0	0	0	0	1	0	0	0	0
Managers	0	6	0	4	3	0	0	1	0
Commercial and technical personnel	3	2	1	1	8	0	0	3	0
Administrative staff	0	2	0	1	2	0	0	3	0
Production	2	5	1	7	23	0	5	9	0



GRI 401-3

5.12. Organisation of working time.

In general, we offer employees very flexible working hours to attend to personal matters, doctor's visits, the work-life balance, adapting to maternity, paternity and breastfeeding dates.

In the event of specific circumstances, we adjust the duration and format of holidays to personal needs. Employees can also work remotely provided their work tasks will permit this. This method of working was widely implemented during the pandemic,

with very good results in terms of performance and satisfaction. The HR department conducted a survey of all employees and published the results, which showed that the majority would like to continue remote working two to three days a week. The option for remote working for those employees whose tasks allow them to do so still exists.



5.13. Equality and diversity.

The Group is characterised in particular by a diverse and egalitarian workforce. The company encourages diversity and multiculturalism, with over 20 nationalities worldwide. This diversity is experienced through multilingual internal communication (Spanish, German, English, French) and multinational departments.

Diversity is an opportunity for the company to attract human talent, gain a competitive advantage and enrich the corporate culture.

The Group has therefore taken the following actions as part of the measures adopted by the Group to maintain respect for and uphold the policies of equality and diversity:

Diversity is an opportunity for the company to attract human talent, gain a competitive advantage and enrich the corporate culture.

The Group has therefore taken the following actions as part of the measures adopted by the Group to maintain respect for and uphold the policies of equality and diversity:

- Code of Ethics: this document is used by the Group to prohibit discrimination. All suppliers we work with must comply with it.
- SA8000 certificate at the head office in Spain: our system of management of the SA8000 standard has protocols for preventing and detecting discrimination and protocols for action in cases of harassment.
- Regular training: the Corporate Responsibility department provides training at least twice a year for all new recruits and for all employees every three years.
- Equality Plan: the head office has developed an equality plan,

Our employees

in compliance with which is assessed annually by the Human Resources department. The results of this analysis are shared with the equality committee to determine any improvements that could be integrated.

- Harassment prevention training: to raise awareness as a pre-emptive action among employees is one of the most important pillars for maintaining a harassment-free culture in the company, so continuous training is provided to all employees on discrimination and harassment issues.
- Suggestion channel: the organisation has a suggestion box available to all employees in all the subsidiaries, which is viewed only by the employee representative. An online or physical system has been implemented according to the company's access and activity at each workplace.



GRI 102-17



5.14. Turnover rate.

To calculate the turnover rate by country, companies with employees belonging to Italy, the United Arab Emirates and Morocco have not been considered, as they have a number of employees equal to or less than 10.

	Turnover rate					
	2018 - 2019		2019 - 2020		2020 - 2021	
	Female	Male	Female	Male	Female	Male
Germany	7%	3%	8%	4%	17%	12%
Austria	12%	8%	13%	8%	112%	4%
Ecuador	12%	3%	5%	1%	3%	2%
Spain	4%	5%	11%	11%	40%	5%
South Africa	8%	4%	53%	21%	69%	71%
Tunisia	3%	4%	20%	34%	16%	21%
Average	7.67%	4.50%	18.33%	13.17%	42.83%	19.17%





Taste the SUN 

6. Community development.

6.1. Working in partnerships.

It is essential to develop alliances and partnerships between different actors to achieve the goals and objectives we want to achieve within the framework of corporate responsibility. The first partners for SanLucar are the community, the employees and their families. They are the people who know what their real needs are and how to improve their quality of life and can offer a positive perspective to the future and achieve local development. In many of our projects we also collaborate with various non-profit organisations, educational institutions and local governments among others. Working in partnerships and networks helps to achieve objectives and benefits everyone, because partnerships pool good ideas, effort and knowledge.

We know that as a private sector company we have a clear role to play in achieving Sustainable Development Goal 17 "Partnerships for the Goals". Partnerships with other actors are long-term, as this ensures that the projects developed are sustainable over time.

We collaborate with a number of non-profit organisations around the world, and these are our partners with whom we develop projects. These entities are best placed to know the real needs of local communities. We are committed to a long-term relationship, as we have been working with some of our partners for ten years.

We also believe in an exchange of dialogue and knowledge, so we actively participate in working groups, webinars, forums, conferences and meetings to share experiences and projects, where dialogue is an inspiration for all. In addition, we regularly present good practices to raise them visibility and to serve as a source of ideas.

Non-profit organisations with which we currently work	Country	Since (year)	Period (years)
UTAIM - Union Tunisienne d'Aide. aux Insuffisants Mentaux	Tunisia	2010	11
Verein Pferde Stärken	Austria	2011	10
Amazing Brainz	South Africa	2012	9
AGIM - Association Générale des Insuffisants Moteurs	Tunisia	2016	5
ATAS - Association Tunisienne d'Aide Aux Sourds	Tunisia	2016	5
Tunisian Ministry of Education	Tunisia	2016	5
Asociación Coordinadora Solidaria de los Estibadores del Puerto de Valencia	Spain	2018	3
FEDA - Escuela de Formación Dual Alemana Madrid	Spain	2018	3
Förderverein Träume werden wahr e.V.	Germany	2018	3
Arche Karlsruhe e. V.	Germany	2019	2
Escuela Básica Miguel Suárez Seminario Ecuador	Ecuador	2020	1
Fundación Iniciativa Social	Spain	2020	1
AVFA - L'Agence de vulgarisation et de formation agricole	Tunisia	2021	0.5
Centro de Transfusión Comunidad Valenciana	Spain	2012	9
Swiss Contact Tunisie	Tunisia	2021	0.5



GRI 413-1

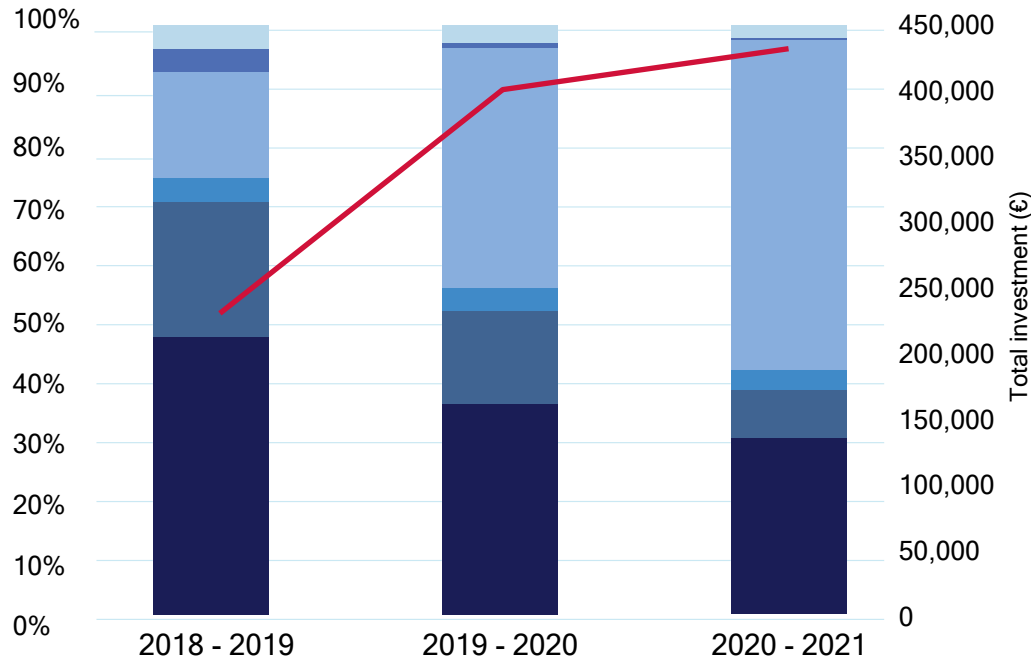
Our partners:



6.2. Investment in community development.

The graph below shows the investment in the social development of the Group's community.

Annual investment and percentage per country for the last three financial years.



	Total annual investment €
2018/19	219,445.00
2019/20	398,044.00
2020/21	427,975.22

- Germany
- Austria
- South Africa
- Ecuador
- Tunisia
- Spain
- Total volume



GRI 203-1

6.3. Our solidarity kitchens in Valencia.

As a fruit and vegetable supplier, a healthy and balanced diet is one of our fundamental principles. The solidarity kitchen, «El Puchero», was founded in 2013 in Valencia on the initiative of Stephan Rötzer, the founder and owner of the Group. The second solidarity kitchen was opened in April 2018. Today, both solidarity kitchens are operated in collaboration with the Port of Valencia stevedores' solidarity coordinating association.

In Valencia, we offer a free service of nutritious food, social care and complementary training. El Puchero started with 50 users and today contributes to the basic food needs of more than 500 people in vulnerable situations and at risk of exclusion. Users collect pre-prepared food that is ready to eat at home and other additional products. Users can therefore maintain a normal family routine and are not stigmatised for eating in a community kitchen. The charity kitchen has been able to increase the number of users since its inception thanks to the collaboration of our regular donors and the support of several schools and private individuals. The charity kitchen has been able to increase the number of users since its inception thanks to the collaboration of our regular donors, as well as the support of several schools and private individuals.



Donor companies: *Fundación Ayuda una Familia, Arroz la Fallera, Horno Pastelería Hermanos Obiol, Consum, KFC, Llusar, Fundación Mano Amiga, Néteo, Platos Tradicionales, Huevos Guillem, Pollos Planes, Congelados Alvent.*



The users are sent from other non-profit organisations with which we work in a network, and are selected based on economic criteria, for example, the absence of income or insufficient income to cover basic needs (justified by the presentation of bills for electricity, water, gas, etc.), and families with minors are prioritised. Social workers also help users with their administration and are available to listen to them and give them advice.



The youngest children in the solidarity kitchens receive a backpack full of the school supplies they need for when they return to school. We provided 471 backpacks between 2016 and 2020. Every year at Christmas, Father Christmas visits the solidarity kitchens to give them a present. We were unable to hold our Christmas party last year, and hope to be able to celebrate it soon.

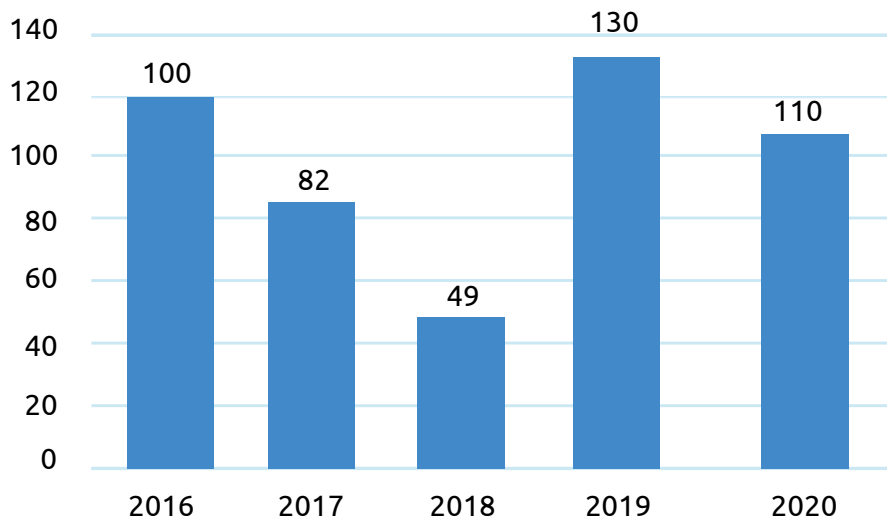


As a consequence of the COVID-19 pandemic, we identified the need to support children in their homework. We therefore launched the »Aprendemos juntos« (learning together) project, school support with the social initiative foundation in Valencia

As a project, El Puchero is part of our local engagement in Valencia with the additional objective of strengthening partnerships to achieve the Sustainable Development Goals (SDG). El Puchero contributes to SDG 2 and SDG 17.



Number of children who have received school supplies.



6.4. »Aprendemos juntos« (learning together) – school support in Valencia.

We and our partners want to promote inclusive, equitable and quality education (SDG 4) for children. As schools were closed due to the pandemic and therefore classes were suspended, the project was launched in Valencia in 2020 by SanLucar and the Port of Valencia stevedores' solidarity coordinating association in collaboration with the social initiative foundation.

The project helps vulnerable students aged between 5 and 14 from the Torrefiel, Orriols and El Puerto districts of Valencia. These neighbourhoods demonstrate academic deficits as a result of lack of equipment and Internet access to virtual classrooms. When selecting the children for this initiative, we focused on children from the beneficiaries of the solidarity kitchens and the Despierta Sonrisas (awakening smiles) project included in the social initiative foundation.



In the following interview, María de Selva Bonilla (head of the children's section) and Sofía Tortajada Maganto (head of the training and participation section) of the social initiative foundation tell us more about the project and the cooperation between the different actors.

Can you tell us something about the social initiative foundation?

When was it created, and for what purpose? Where are your projects located?

The Foundation was created in 2004 to offer greater educational opportunities to disadvantaged children and families. The founding principle was our belief that the most effective tool against poverty is education, because it enables people suffering from poverty to build a better future for themselves.

We have childcare projects in Valencia, Castellón and Alicante. We also contribute financially with educational projects in Congo and Cameroon.

How long have you been collaborating with SanLucar and how did it come about?

The collaboration with SanLucar began in 2019 and arose out of Sofia's personal friendship with SanLucar employee Gloria Casas. We had planned an educational project that could not be carried out because of the pandemic, but the various meetings we held helped us to realise that we were entities that were aligned both in terms of objectives and ways of working.

How did the idea of "learning together" school support come about?

How many children have participated in the 2020/2021 academic year?

Once the children were able to return to a physical presence in the classroom, we saw the need to support the children who, due to their socio-economic circumstances, had not had the opportunity to follow their classes



Full name:

María de Selva Bonilla

Sofía Tortajada Maganto

Position:

Head of the children's section.

Head of the training and participation section.

digitally, and showed some serious disadvantages in terms of their school work. The »school support« project arose out of that. 43 children participated, both from the Port of Valencia area and from the Orriols and Torrefiel neighbourhoods in the 2020/21 academic year.

It would be interesting if you could tell us something about the methodology in the classes, and to what extent the parents are involved.

We see school support as a way of enabling children to study. More than just helping them with their homework, we reinforce their basic learning skills, such as reading comprehension, logical-mathematical concepts and basic knowledge of foreign languages. We also want to teach them and motivate them to study, so that the time spent in our activities means a personal change for every child that will enable them cope on their own with their future course work. In addition to academic knowledge therefore, self-esteem, the possibility that they may feel frustrated and the work ethic are reinforced, which are essential if they are to overcome the challenges at school and work they will face in the future.

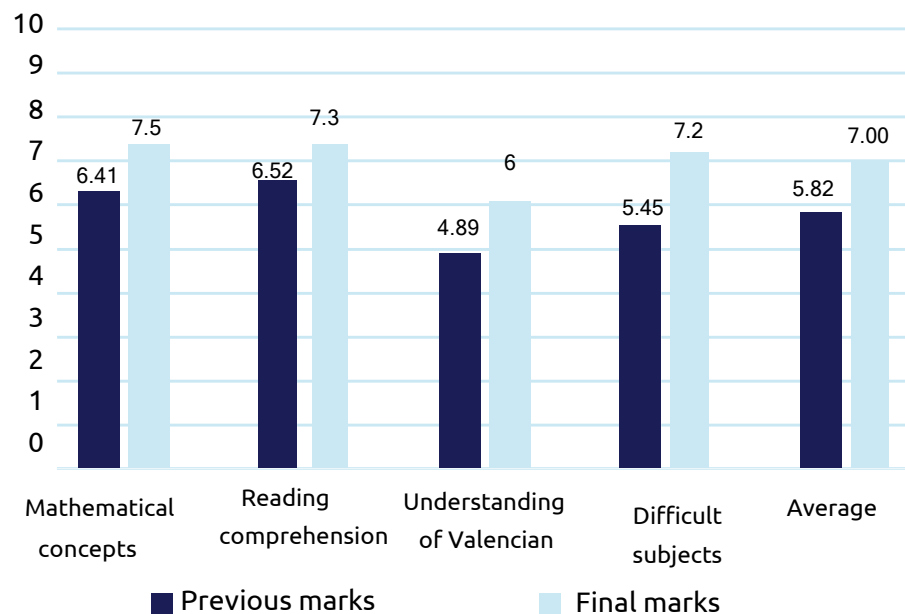
The methodology is group-based and dynamic. Currently they have one 1 1/2 hour session per week, but we are planning to increase this to two 1 1/2 hour sessions a week. The first half hour of the session is spent in small groups reviewing basic academic knowledge, followed by individual exercises to highlight each individual's weaknesses and personal guidance to acquire personal tools. Educational games are played in the last half our to make sure that learning is also fun.

The coordinators are in contact with the teachers to coordinate the work with the school. The progress of each child is discussed and the teachers highlight the points to work on with each

child. At the end of each session, the teacher is informed of the progress of the session to ensure a fluid communication and the work is much more effective.

Once every term we have a celebratory event to reward the efforts and improvements of each beneficiary of the project. The families are invited to a training session during the event, and we give them a snack afterwards. This motivates children to maintain their effort and involves parents in their children's education.

Overall trend of academic performance



You mentioned that the project requires volunteers to provide individual support. How is the work with volunteers organised and how could someone volunteer for this or other projects you are planning?

The project management is carried out by technicians hired by the foundation, but the project roll-out wouldn't be possible without the effort of so many volunteers who, week after week, work with the children to make this project possible. All you need to volunteer is a little time every week and lots of enthusiasm to give to those in need. The foundation's volunteer manager is always available to welcome anyone interested, explain the opportunities available and guide them in the induction and training process.



Could you say something about the results you have achieved after this first year?

The results have been very positive, both in terms of personal improvement (evaluated by the volunteers, the technicians and the children's teachers) and their academic results.

For example, we had a student who came to the school support with no motivation whatsoever and with very bad marks. His attitude was of great concern because he was in the last year of primary school and it was important for him to be able to progress to secondary education academically prepared and with a positive and hard-working attitude. Throughout the course, the support he received in school support helped him to become more self-confident and motivated in his studies and he finished the course with very good grades.

An evaluation of the project by a volunteer survey showed very good results: The volunteers who have participated in this activity value the positive impact of this project extremely highly, and rated it 9.5 out of 10. The effectiveness of the activities carried out with minors is rated 9.0. We also found that children's grades increased by 8-17% as a result of the tutoring sessions.

What is your vision for the school support project and the collaboration with SanLucar in the long term?

Our vision is to continue working in Torrefiel and Orriols (districts in Valencia) and therefore be able to help the children from the El Puchero solidarity kitchen who need this resource. We're currently working with children in primary education, but would like to extend the support to include two further school classes up to the second year of secondary education, as we see that the jump to secondary education is a challenge that pupils can find difficult to negotiate on their own.

The collaboration of SanLucar is important because it ensures continuity over time, as the Foundation is financed by private grants and public subsidies which, by their nature, vary year after year. Thanks to SanLucar, we are confident that this project will be able to continue to serve the children and will prove to be very effective over time.

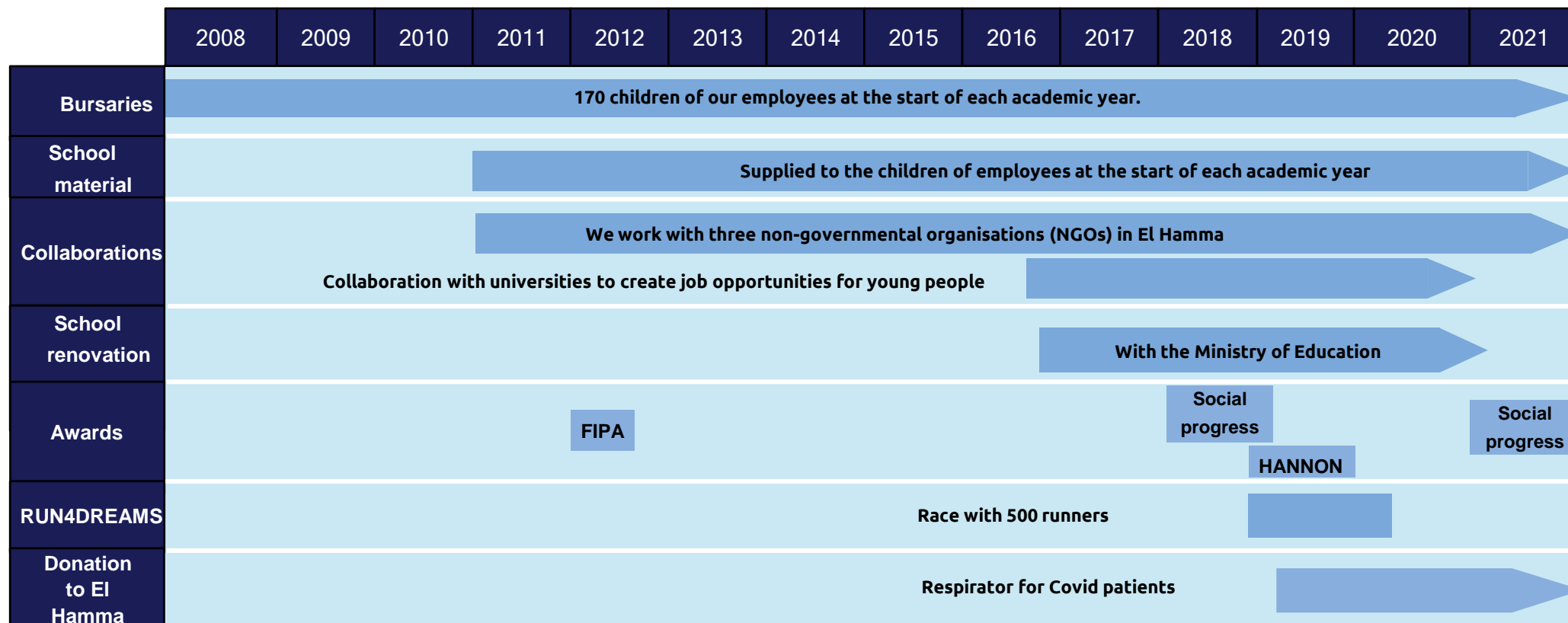
At the time of writing, the contract to continue the project for another year has been signed.

**Aprendemos
juntos**
Refuerzo escolar 2020/2021



6.5. Our social commitment in Tunisia is reaping rewards.

We have been growing our tomatoes on the farm »La Cinquième Saison« in the region of El Hamma, in the south of Tunisia since 2008. Thirteen years later, in May 2021, the President of Tunisia awarded us first prize in the »National competition for social progress« for the second time. The award recognises our work in the field of the working environment, our partnerships with educational institutions in the region and environmental initiatives. The prize is worth 10,000 dinars (approx. €3,000), which SanLucar donated to the hospital in El Hamma to purchase equipment to provide oxygen.



To learn more about the work of SanLucar in Tunisia, please find below an interview with Faycel Ghandri, Human Resources Manager of SanLucar in Tunisia.

SanLucar as a company has been operating in Tunisia for 13 years, since 2008 in El Hamma in the south of Tunisia and since 2012 in Bizerte in the north of Tunisia.

What social challenges has the company faced over the years? Can you recall a specific situation?

SanLucar's presence in Tunisia over the last decade has strengthened the agricultural landscape, contributing both to the integration of new technologies, the implementation of internationally recognised quality standards, etc. and has boosted the local economy, as we are a leading exporter of fruit and vegetables in the country. Socially, SanLucar is a socially responsible group that is recognised worldwide for its compliance with the applicable laws and social standards.

The biggest challenge we have faced in the management of SanLucar in Tunisia is to embed our culture in the various Tunisian subsidiaries. Our vision and values are the basis for the social success we are experiencing.

The key success factor in taking on this challenge is undoubtedly the involvement of all the teams and their unconditional willingness to continue along the path that the Group has chosen for all its employees.



Full name:

Faycel Ghandri

Position:

Human Resources Manager
SanLucar in Tunisia.

Tunisia as a country has gone through many difficult political and social changes and situations in recent years, most recently the pandemic, but SanLucar has managed to continue its activities on both farms throughout these times. In your opinion, what has helped SanLucar to continue its activities?

The success of SanLucar in Tunisia in recent years, during which Tunisia has gone through several political, social and health crises, is essentially linked to:

- A vision shared by all family members SanLucar,
- The respect and trust established with internal and external stakeholders;
- Direct, continuous and transparent communication with all employees;
- A social policy that is transparent, recognised and accepted, a social agenda that is observed and followed with all our social partners.

When managing the COVID-19 crisis, it was essential to implement a business continuity plan that considered all the factors that could directly and indirectly influence our processes, and which anticipated the scenarios that may arise. The involvement of the authorities in our implemented health protocols has strengthened the bonds of trust and facilitated business continuity.

A special crisis committee was set up and discussions were held with all the social partners on the measures to be implemented, regulatory control and daily monitoring of health protocols. The organisation of the roles and missions of each member and the vigilance of our colleagues formed the basis of this success.

As the head of Human Resources in Tunisia, how do you think employees benefit from being part of a socially responsible company like SanLucar?

The majority of our employees feel that being part of SanLucar in Tunisia is a source of pride. SanLucar Tunisia is not only an economic player, but also occupies an important social role in the regions where it is located.

Our employer brand is a factor in attracting and retaining talent. Our reputation goes beyond the company and is reflected in the environment through our corporate responsibility policy.

The economic and social stability, the growth of the business since the integration of SanLucar, the code of ethics, the social policy and the human resources policy are encouraging factors for the retention and attraction of talent.

To date, SanLucar has initiated many projects for its employees, their families and the local community since 2008. We have projects including the 'Fête de savoir' (festival of knowledge), and the provision of school supplies, partnerships with various non-profit associations that support people with disabilities, and even partnerships with universities. What are the motivations and/or objectives when developing a project and launching a partnership?



- Our corporate responsibility policy influences the evaluation of the company's performance, which is analysed from three perspectives:
- Environmental: compatibility between the company's activity and the maintenance of ecosystems;
- Social: social consequences of the company's activities; and
- Economic: financial results.

SanLucar's commitment through its corporate responsibility has enabled us to support DREAMS projects, which place people at the centre of its work through projects that promote education, health, nutrition and sport; concentrating on all actions that have a direct link to our employees, their families and the region.



In your opinion, what are the areas of sustainable development, whether social or environmental, to which Tunisian companies can contribute to advancing the UN SDG?

- In Tunisia, the main axes of the SDG that companies should focus on more are:
- Affordable and clean energy (SDG 7)
- Clean water and sanitation (SDG 6): avoid water wastage
- Responsible consumption and production (SDG 12): recycling, etc.

SanLucar is developing several projects in partnership with the Tunisian government and has received various awards. Can you tell us how the partnership was formed? How can the impact of this type of cooperation be made visible?

The collaboration with the government in various projects stems essentially from SanLucar's support of corporate responsibility projects.

We are developing a system to track all the awards we can take part in to enhance our social investment. Close liaison with representatives of the government, the public authorities, the community and the associations weaved into it has enabled us to obtain the necessary information and guidance and the resulting recognition.

The awards received by SanLucar Tunisia from the Tunisian government are the result of a great effort on the part of our division, which reinforces our image as a responsible employer in Tunisia.

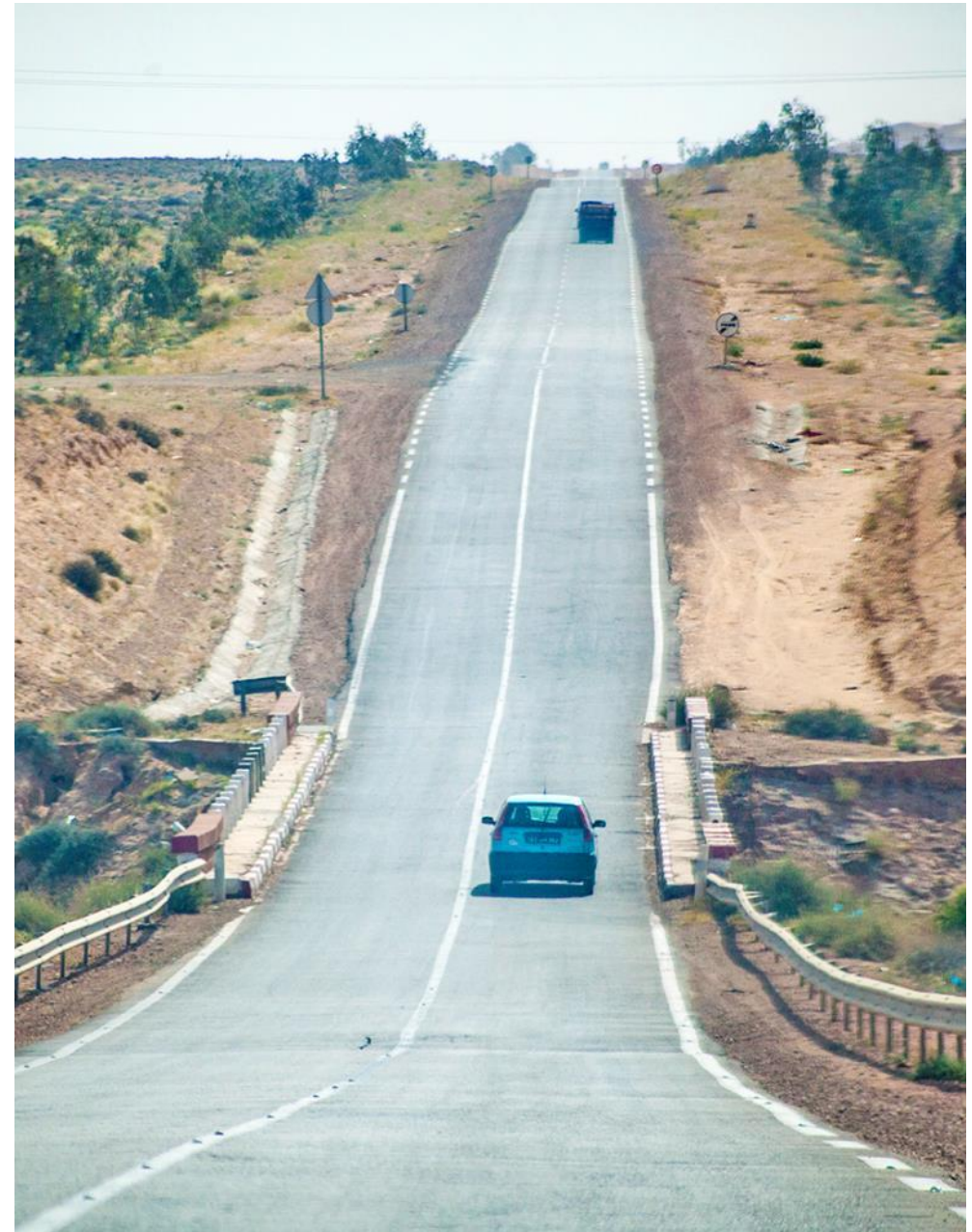
Particularly significant is SanLucar's commitment in Tunisia to the promotion of SDG 4 (quality education) and SDG 8 (decent work and economic growth).

- Partnership agreements have been established with vocational schools and universities to ensure quality training and education for students that will enable them to enter the world of work and to acquire advanced technical knowledge through work placements and internships.

What is your vision for SanLucar in Tunisia regarding its commitment to sustainable development in ten years' time?

- My vision is that the aim of the SanLucar management in Tunisia will be to pursue the path we have already embarked on and to develop further projects and initiatives that can contribute to other SDG.

Special focus is given to education (programme under discussion with the government), health (we are planning a range of actions designed to prevent various types of diseases for the benefit of SanLucar employees and their families), to sports through the sponsorship of local sports associations and those close to our facilities and to nutrition.



Our initiatives in South Africa.

We started in South Africa in 2011, and since then have initiated various projects for children and adults. The first major project we started in 2013 was the kindergarten »SanLucar Speelskool« (SanLucar play school) in our citrus farm in Rooihogte, which is also attended by the children from our De Hoek grape farm until they start primary school. Childcare is free of charge for our employees.

We started in South Africa in 2011, and since then have initiated various projects for children and adults. The first major project we started in 2013 was the kindergarten »SanLucar Speelskool« (SanLucar play school) in our citrus farm in Rooihogte, which is also attended by the children from our De Hoek grape farm until they start primary school. Childcare is free of charge for our employees.

The 'Amazing Brainz' programme was developed specifically for rural South Africa and aims to encourage children aged three months to five years to take an interest in school and study. The aim of this programme is therefore to stimulate and improve learning skills in the first years of life. We also have facilities for older children and young people where we support them with after-school classes and access to a media library. We have invested in the CAMI teaching software, which provides academic support in languages and mathematics.

In addition to all this, as the nearest village is half an hour away, we have been working on a permaculture garden on our Rooihogte farm since 2017. The garden is managed by the members of the farm community so that they have a source of healthy food at all times, with the first harvest going to the kindergarten, ensuring that the youngest children develop good eating habits from a very early age.



The rest of the harvest is sold in the community shop at a fair price and the profits are donated to other community projects. As the permaculture garden in Rooihogte has been so well received and successful, in 2020 we also started another permaculture garden on our farm De Hoek along with a community shop.



Improvement of schools in rural areas of Costa Rica.

We have carried out several projects to improve rural schools in recent years in the Pital area of Costa Rica; a region that is used for growing pineapples. We joined forces with our pineapple farmer »Tropicales del Valle« in the 2020/2021 season to donate new desks and TV screens to the Santa Elena elementary school.

A total of 190 pupils attend the Santa Elena School, of whom about 50% are children of employees of our pineapple farmer. The pandemic brought with it new challenges for education and that safety measures could be maintained. Meetings took place with the school management.



to gain a better grasp of the needs. They explained the changes that were necessary and the needs of each pupil. Although there is a mixed programme of virtual and face-to-face classes, not all children learn in the same way, and some pupils need more of the face-to-face class.

We learned about the requirement for new television screens to give all pupils the same opportunity to learn, i.e. to be able to understand the explanations provided by the teacher with visual support while maintaining social distancing. We also provided comfortable school furniture in the appropriate conditions.





Taste the SUN 

7. Environment.

7.1. Waste prevention and management.

At SanLucar, our most important partner is nature, which is why we are continuously working to reduce the direct and indirect impact of our company's activities on the environment. You will find information on the most relevant environmental aspects of SanLucar' activities below

The companies referred to in each section are listed in Annex 2: Group companies. If any indicator has not taken a particular company into account for any of the years, this will be mentioned in the relevant section.

Sustainable packaging to prevent waste and manage it more effectively.

SanLucar has a department dedicated solely to improving and innovating the packaging of our fruit and vegetables to make it more sustainable and to maintain the quality and shelf life of our products, thus helping to reduce food waste. We are currently working on a strategy that promotes plastic reduction and the use of 100% recyclable packaging to help our end customers recycle more easily. Our strategy is in line with the European Union's strategy to reduce the use of plastic in packaging, and at the forefront of new legislation to reduce plastic use, which will be introduced at a national level. We are also working to ensure that the majority of the paper and cardboard we use comes from FSC-certified forests, thus promoting sustainable forest management.

The development of the packaging strategy is backed up by the results of scientific studies being carried out with external institutes such as ITENE, which include the study of the carbon footprint of various types of packaging for our products, demonstrating our transparency and commitment to climate protection.



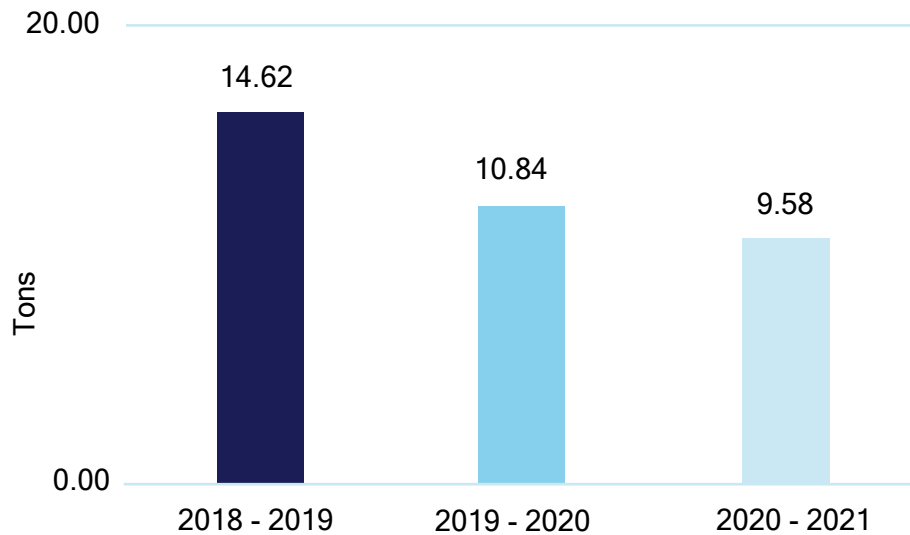
Waste management.

We are working to improve waste management systems in all our subsidiaries. Practices include waste prevention and good waste management. We use the annual collection of GRI indicators to classify waste by type and method of disposal to enable us to ascertain where we need to focus our efforts.

SanLucar classifies waste management into two groups: hazardous waste and non-hazardous waste. Both groups of waste can be managed by SanLucar or by its authorised agents. Data for the last three financial years are presented for our subsidiaries in Germany, Austria, Ecuador, Spain, South Africa and Tunisia.

Hazardous waste: includes empty chemical containers, plastics with chemicals, energy-saving lamps, medical waste, batteries and used oil.

Hazardous waste generated by the Group in tons.



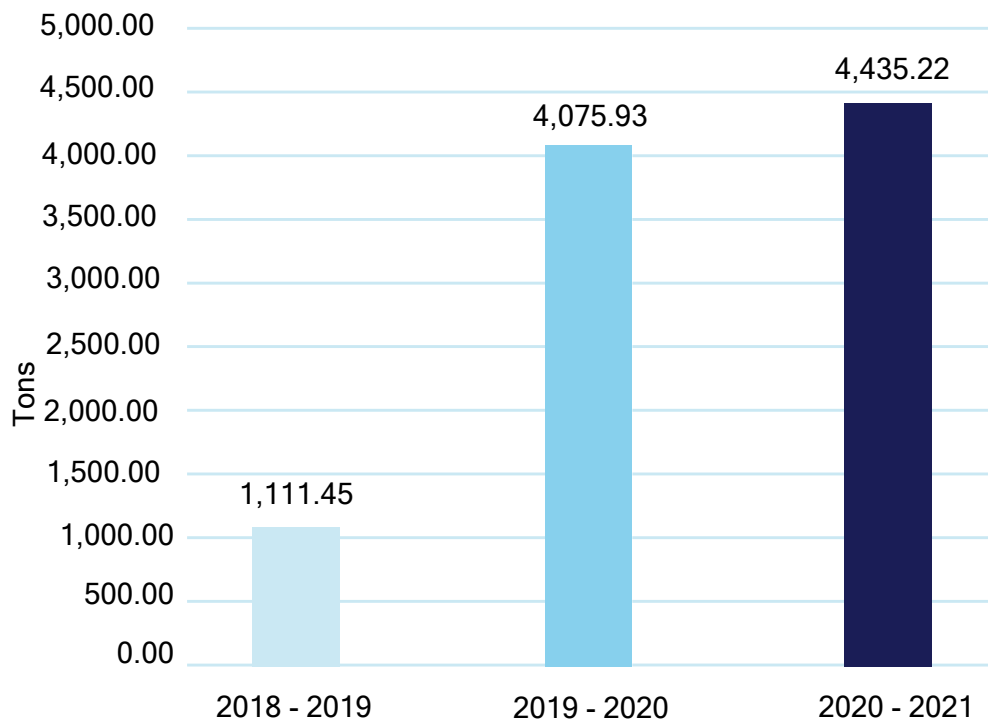
	Hazardous waste in tons		
	2018 - 2019	2019 - 2020	2020 - 2021
Reuse	0.00	1.98	0.23
Recycling	13.41	8.81	7.41
Recovery	0.07	0.05	0.11
Incineration	0.01	0.00	0.51
Storage	1.14	0.00	1.32
Others	0.00	0.00	0.01
Total weight	14.62	10.84	9.58

Non-hazardous waste: includes plastic, paper and cardboard, organic waste, glass and wood.

The organic waste from the South African companies was not taken into account for the calculation of the 2018/2019 financial year, so the final amount of non-hazardous waste in that season was lower than in subsequent seasons when the data collection started.

GRI 306-2

Non-hazardous waste generated by the Group in tons.



	Hazardous waste in tons		
	2018 - 2019	2019 - 2020	2020 - 2021
Reuse	4.14	610.46	40.42
Recycling	812.43	3009.41	3866.19
Recovery	0.00	0.00	0.00
Incineration	0.00	0.00	0.00
Storage	84.40	0.00	0.20
Others	188.00	442.00	520.30
Total weight	1111.45	4075.93	4435.22

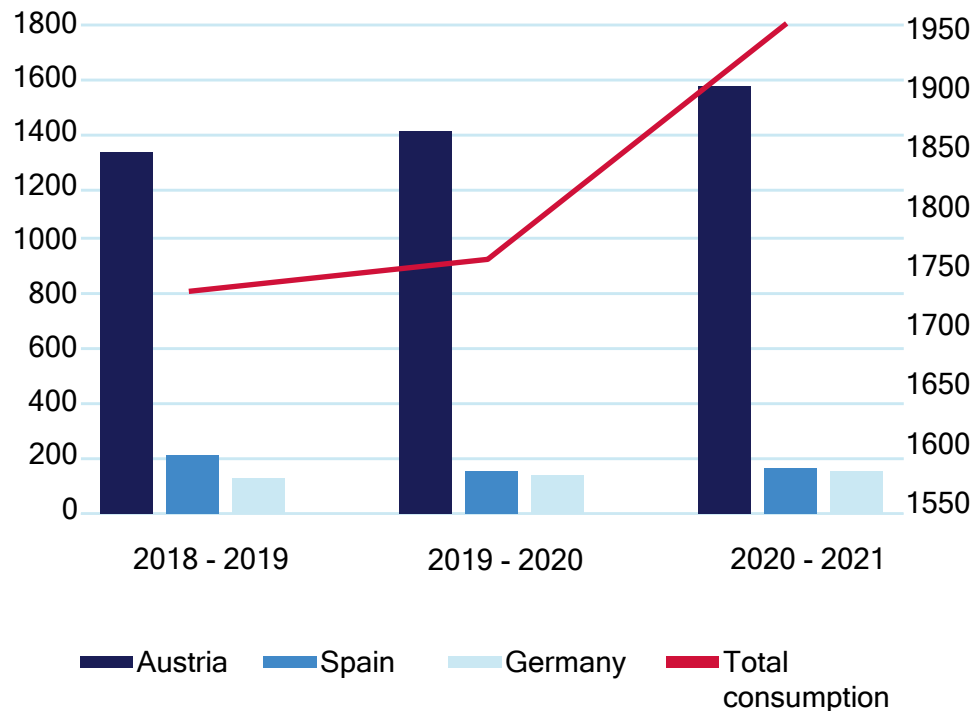
7.2. Energy consumption within the organisation.

Energy consumption in offices and warehouses.

The graph below shows the percentage of energy consumption in offices and warehouses per country, regarding the total consumption per season or group. In addition, it also indicates the total energy consumption in kWh, per square metre, per country.

The area data for the calculation of the kWh/m² is available in Annex 3: Area of offices, warehouses and farms.

Electricity consumption (kWh/ m²) in offices and warehouses.



The graph shows that Austria has a considerably higher energy consumption compared to Spain and Germany. This is due to the fact that a process warehouse is in operation in Austria, which results in higher energy consumption.

We can also see a gradual increase in energy consumption started in the 2019/2020 season. Austria was responsible for most of this increase with the SanLucar Manufaktur GmbH production activities and associated premises.

GRI 302-1

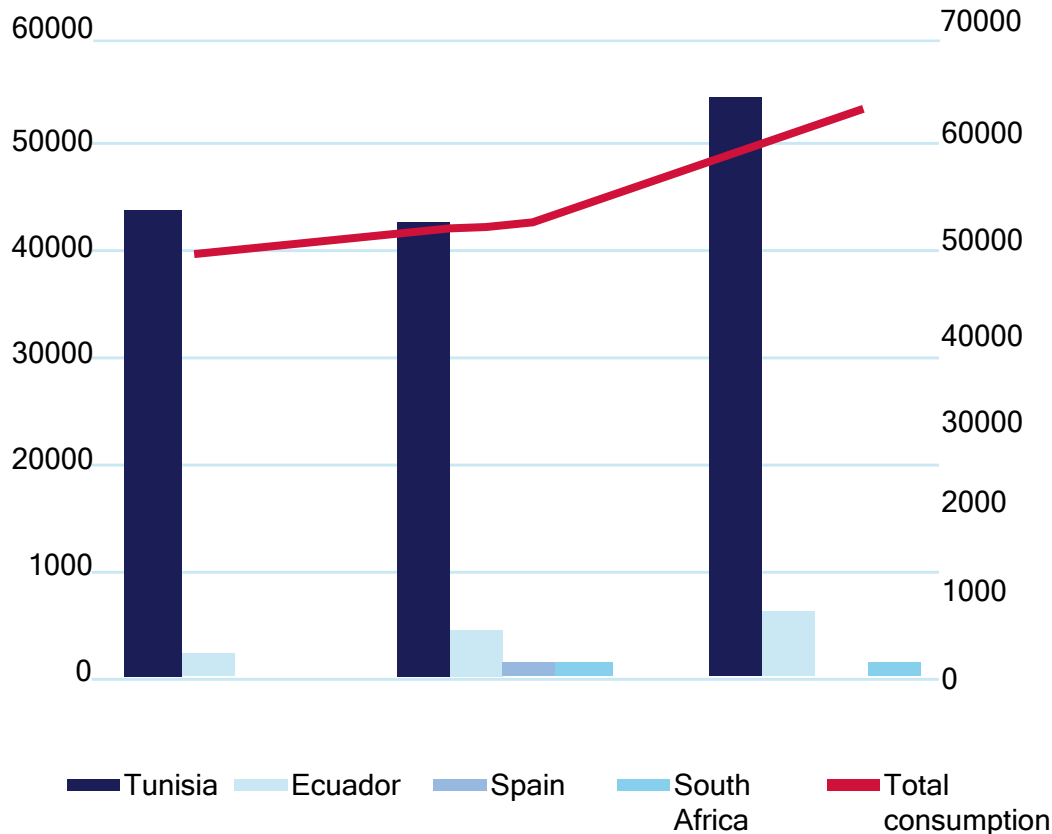


Energy consumption on producing farms.

The graph shows that the total energy consumption on the Group's farms has gradually increased. However, please note that South Africa's energy consumption is incorporated for the first time in the 2019/2020 season, which may have contributed to the lower energy consumption in 2018/2019.

GRI 302-1

Electricity consumption (kWh/ha) on producing farms



The graph also shows that Tunisia has the largest share of energy consumption on producing farms; this is because they have a high-tech greenhouse. Energy consumption in Ecuador also increased in the 2019/2020 season, as a packing house with cold storage was built, which consumes energy.



Use of renewable energies: solar panels.

At SanLucar we are aware of the impact that energy consumption has on the environment. We have therefore decided to use solar energy in our offices in Puzol (Valencia, Spain) and Ebreichsdorf (Austria). The installation of photovoltaic solar panels on the roof of our offices, which harness solar energy, has increased our energy efficiency, reducing the environmental impact compared to other more polluting sources of electricity.

Installation of solar panels at the offices in Puzol, Valencia, Spain.

Since its was installed in May 2021, the 360m² area of solar panels generates approx. 190kW on a day with average radiation, which is a saving of *22.5% of the total energy consumed on a Saturday or Sunday; and 18.5% of the total energy consumed on a working day.

SanLucar is aware of the potential that solar panels have to generate energy at our offices in Puzol, however, lack of space is one of the most important obstacles hampering the expansion of the project. Despite this, there are plans to install more solar panels on the roof of a building that is currently being renovated. Once completed, the remaining square metres will be used to increase the capacity for generating our own energy supply.

Installation of solar panels in the Austrian offices.

Similar to Puzol, our office in Austria has solar panels on the roof covering an area of 1,400 m², and which supplies 7% of the total energy from a cleaner and more renewable energy source than other conventional energy sources.

The installation of solar panels is helping to increase the share of renewable energy in Austria and Spain, contributing to Sustainable Development Goal (SDG) 7: affordable and clean energy, and SDG 11: sustainable cities and communities.

*18.5-22.5% of the total energy is generated from photovoltaic panels**

**Values for a sunny day with an average radiation. These values are indicative and depend on several factors.

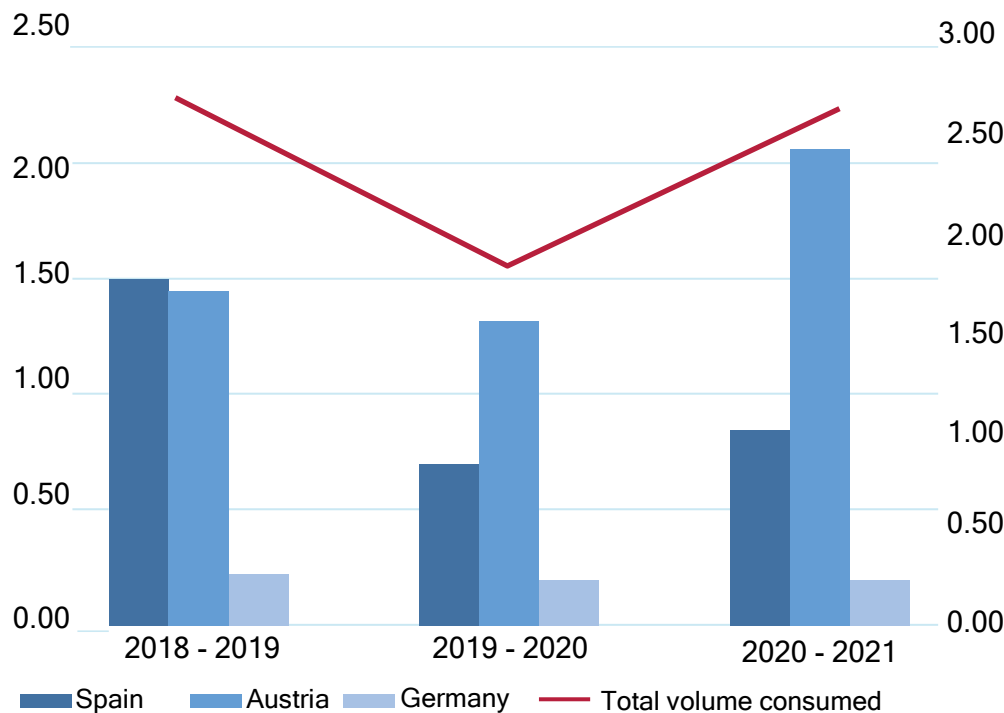


7.3. Interaction with water as a shared resource.

Water consumption in offices and warehouses has been calculated in cubic metres per square metre, taking into account the area of the facilities in use. The graph shows a reduction in average water consumption in the 2019/2020 season, followed by a recovery in the 2020/2021 season. This is associated with the onset of the pandemic and teleworking during this time, and then with the gradual return to face-to-face work.

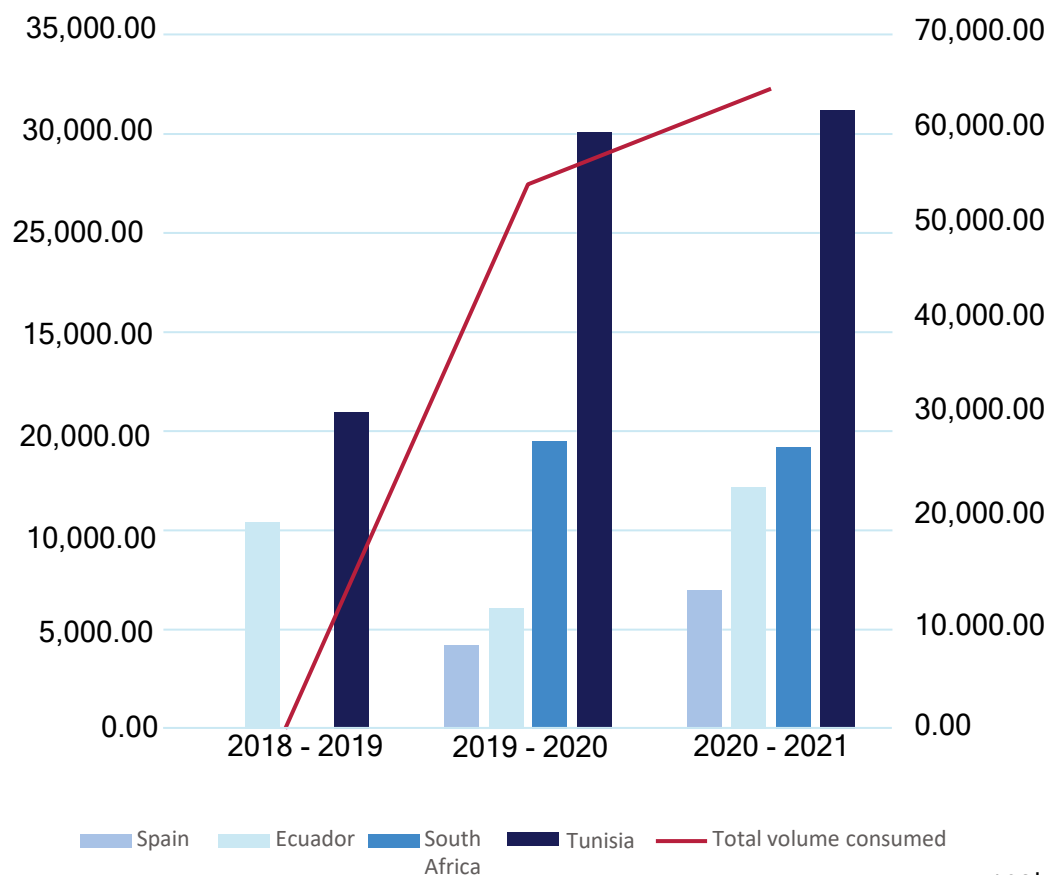
The area data for the calculation of the m^3/m^2 is available in Annex 3: Area of offices, warehouses and farms.

Water consumption (m^3 / m^2) in offices and warehouses.



It is important to note that, in terms of water consumption on the producing farms, both SanLucar South Africa Citrus S.L.U. and SanLucar de Hoek Ltd. were not taken into account in the 2018/ 2019 season as the data was not available, which explains the low consumption for this year.

Water consumption (m^3 / ha) in the producing farms.



For the 2020/2021 season of SanLucar South Africa Citrus S.L.U., the same figure was used as for the previous season, as the closing date for 2020/2021 was not available at the time the report was written. In addition, the farms in Spain were not taken into account for the 2018/2019 financial year, as they are not material.

With regard to water consumption in Ecuador, it should be noted that there has been a change in data collection. This is because the water meter on the Santa Elena farm was previously in the name of the former owner, although it was being operated from SanLucar. The owner of the water meter of this farm, which belongs to our Ecuadorian subsidiary Quilziolli S.A., changed in 2020/2021, and the water consumption for this farm has therefore been recalculated for the 2019/2020 season and included in the consumption for the 2020/2021 season.

GRI 303-1

Discharge of water according to its quality and destination.

In accordance with the GRI 2016 guidelines, one company belonging to SanLucar that produces wastewater has been identified: Lexkingsa S.A., in Ecuador. There are banana plantations here also where the packing station is also located, where wastewater is produced.

Wastewater consumption only varies with the number of process weeks. The following table shows the volume of wastewater produced per hectare of production:

	2018 - 2019	2019 - 2020	2020 - 2021
Process week	52	52	53
Water volume (m ³ per ha)	51.78	51.78	52.77

GRI 306-1



7.4. Use of herbaceous inter-row cultivation in plantations in South Africa.

From mid-2021, SanLucar commenced testing the use of herbaceous inter-row cultivation at its De Hoek grape farm in South Africa. The use of a mixed cultivation of strips of trees and strips of green or flowering with grasses, herbs and meadow flowers is a very old and sustainable method. The roots of the herbaceous plants between the fruit trees improve soil aeration and loosen the soil; this also allows the soil to absorb and store greater quantities of water and reduces erosion. Soil erosion is soil degradation, often caused by water run-off, wind or snow melt, largely caused by human activities. The De Hoek grape farm is situated on a hillside, which makes the use of inter-row cultivation particularly interesting, as the risk of erosion is even higher in this case owing to the slope of the land. In addition, inter-row cultivation of herbaceous plants also helps to supply the soil with important nutrients once they have been returned to the soil, which in turn benefits the crop.

In a first trial phase, barley was sown in the green strips between the vines, as it grows very well in the Western Cape where the De Hoek farm is located, when it is sown in autumn/winter. Barley produces a good root system that protects the soil. In addition, wood chips were used as mulch under the grape plantations, which provides further protection to the soil and helps conserve water.

The trial phase of the green strips is carried out for a period of two years. If the results are good, the method will be extended to other growing areas. We are convinced that the use of green and flowering strips between our grape plants is a further step towards sustainable cultivation.



7.5. Trial with Transfesa Logistic.

SanLucar produces and distributes roughly 90 varieties of fruit and vegetables to different parts of the world from 35 producing countries on five continents. The traditional form of transport is European-wide road transport by refrigerated lorry, but in 2021 SanLucar decided to test rail transport in cooperation with Transfesa Logistics, a specialist in rail freight transport.

The aim of the trial was to become familiar with and test the advantages of this type of transport. After a first trial load, a new opportunity has arisen for us for certain types of cargo, as it proved that it is possible to transport our products while maintaining quality standards and making a positive contribution to the environment.

The average distance travelled for goods within Europe is between 2,000 km and 3,000 km, and typically between 22.5 and 24 tons of fruit and vegetables are transported. SanLucar launched the first rail trial phase from February to April 2021, and transported 24 tons of citrus fruit from Valencia (Spain) to Cologne (Germany) by a combination of truck and train. The trial consisted of five loads of 32 pallets each. Of the total 1,885 km travelled, only 85 km, or 4.5% of the total mileage, was covered by truck.

This first attempt has taught us where we can improve to achieve a more seamless process. For example, we learned that loading times for rail transport are much shorter than for truck transport and more precise advance planning and coordination is therefore required.

There are several aspects to consider when transporting goods, such as product quality and flexibility, because for us the most important thing is to be able to offer our customers the best possible quality and freshness.

At the time of writing, we can confirm that SanLucar will continue to develop the rail transport of its goods. For example, from October 2021, SanLucar will participate in the “Mercancías al tren” (goods by rail) initiative, launched by DB Cargo and Transfesa, among others. The aim is to enhance the value of rail freight transport and to get more freight onto the train in order to reduce the amount of CO₂ emissions, thus contributing to climate protection.



Another partnership for climate protection.

When transporting our products, we consider companies that care as much about sustainability as we do. In addition to our collaboration with Transfesa Logistics, we also work with Delgo S.A., who use vehicles powered by liquefied natural gas (LNG).

LNG is an alternative fuel to oil derivatives and has many advantages for a sustainable energy transition. One of the main benefits is that it reduces environmental pollution, contributing to better air quality, as it emits fewer polluting particles than other conventional fuels. For example, LNG

can emit up to 20% and 30% of carbon dioxide emissions (CO₂), which also contributes to reducing the effects of climate change.

Our partnership with Delgo in the first quarter of 2021 enabled us to make a reduction in CO₂ equivalent to that which would be absorbed by 1.286 trees during the same period. SanLucar has contributed to the reduction of 82,899.56 kg of CO₂ during the months of May and June 2021. We are continuing to contribute to this reduction through our partnership with Delgo.



CERTIFICADO DE REDUCCIÓN DE CO₂
SANLUCAR FRUIT, S.L

¡Enhorabuena por formar parte del programa **DELGO SOSTENIBLE!**

El uso de los vehículos propulsados por GNL en su día a día, durante **MAYO Y JUNIO 2021** ha supuesto un ahorro de:

4.089.876 g de CO₂

La reducción total de CO₂, gracias a clientes como vosotros, asciende a **82.899,56 kg**

Seguiremos aumentando esta cifra juntos.

DELGO OPERADOR DE TRANSPORTE S.L





SanLucar

Taste the SUN 

8. Fruit and vegetable suppliers and subcontractors.

For SanLucar, the respect and wellbeing of our employees is a priority, not only for our own employees, but also for the in-house suppliers and subcontractors with whom we work. The monitoring of suppliers and their approach has changed a great deal in the last 20 years in response to legal requirements, international standards and consumer expectations. SanLucar is therefore optimising our supplier and subcontractor management and making it more effective. The requirements of a supplier control system have shifted from a focus solely on product quality and availability and compliance with hygiene standards and maximum permitted residue limits, to the acquisition of social certifications. Governments in different countries are passing legislation to regulate the monitoring of value chains, which entails the various processes to be reviewed and adapted.

We are therefore working with a multidisciplinary team to bring our value chain monitoring system to the forefront. This helps us to ensure that the commitment to human rights and sustainability of our suppliers and subcontractors aligns with our own.



GRI 407-1 / 408-1 / 409-1



8.1. Monitoring of fruit and vegetable suppliers.

SanLucar activities take place in different parts of the world, which implies very different terrains, cultures and working methods. This means that managing social and environmental impacts along the value chain can be challenging. We at SanLucar have therefore decided to assume the responsibility of helping to reduce and mitigate these impacts.

This system assesses both social and environmental aspects, demonstrating our commitment to human rights, workers' rights and respect for the environment. We also want to be at the forefront of European legislation on human rights and environmental due diligence along the value chain.

The aims of this monitoring system are to:

- Ensure that our partners comply with the required social and environmental requirements
- Guide them towards the achievement of their desired requirements
- Contribute to the objective of achieving a fair, sustainable and transparent value chain.

We are committed to dialogue with suppliers from the outset to make them true partners in an effective and robust monitoring system. We have set the goals of mutual commitment and moving together towards a transparent value chain.

The first trials of the system were carried out with our major fruit and vegetable suppliers this year to receive feedback and make any necessary changes. At this stage they are also helping us to improve by contributing their feedback and suggestions for improvement.

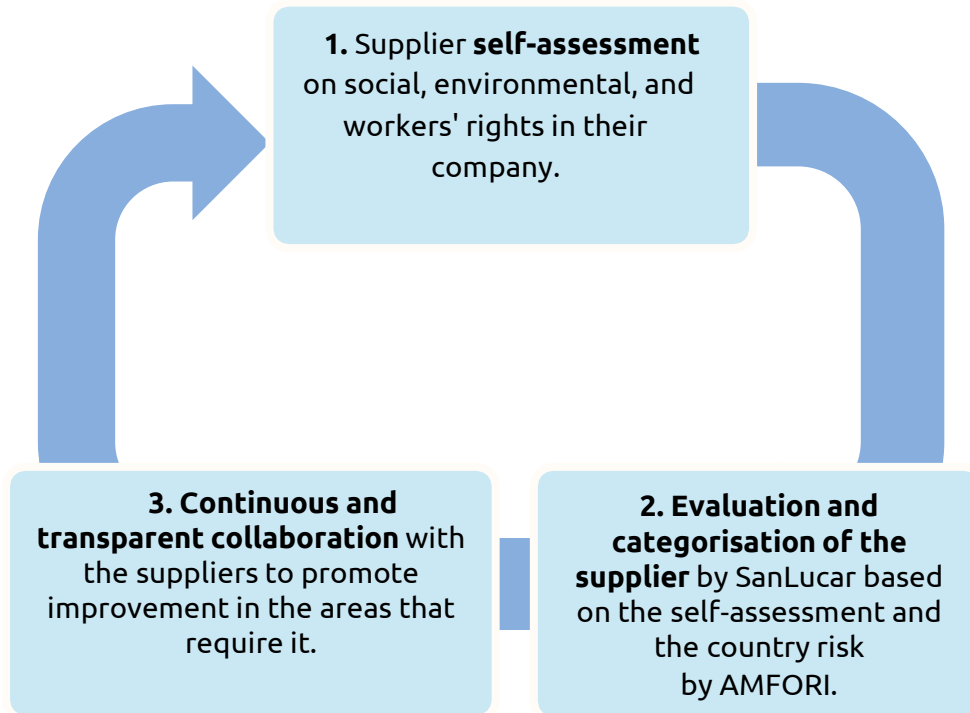
The monitoring system will be implemented subsequently at all our fruit and vegetable suppliers.

This system requires our suppliers to complete a self-assessment, taking into account aspects such as general company information, voluntary work and child protection, working conditions, occupational health and safety, good governance practices and commitment to the environment. Once the self-assessment is completed, our CR department verifies the result and categorises the supplier, taking into account the country risk based on the AMFORI report. The final result categorises the supplier according to high, medium and low risk.

From this point, we actively and transparently involve suppliers through an evaluation report and the development of an action plan. We are committed to continuous improvement in collaboration.



Stages of the supplier control system:



This is helping us to improve our management system, because our relationship with our main suppliers of fruit and vegetables is based on trust and continuous dialogue.

8.2. In-house subcontractor management.

Our in-house suppliers and subcontractors are all service providers and subcontractors who perform their tasks at the head offices and the logistics platform in Spain.

In a first step, subcontractors are categorised based on their frequency and time spent at our facilities. They are sent an evaluation questionnaire with this information that covers, among others, aspects of working conditions, the recruitment process and discrimination and equality. What we want to ascertain from the evaluation questionnaire is their commitment to our standard and to help them improve where necessary.





Taste the SUN 

9. Financial information.

9.1. Accounting and tax information

Detailed accounting and tax information for the Group and the individual companies for the year ended 30 June 2021 is available in the notes to the consolidated financial statements.

The main items of importance as far as the Group's results and tax aspects are concerned are as follows:

Accounting aspects.

Mamaritz is the controlling company of the Mamaritz Group, and its consolidated accounts include the financial statements of the companies directly or indirectly controlled thereby, at 30th June of each financial year.

The contribution of consolidated profits of the companies forming the Group, divided between the result attributable to the Controlling Company and the result attributable to the external partners, during the financial year closed at 30th June 2021, is as follows:

Controlled Company	Controlling Company	External Partners	Total
Mamaritz, S.L.U.	(81,269.00)	-	(81,269.00)
The Roetzer Family, S.L.U.	(97,678.86)	-	(97,678.86)
SanLucar Flowers, GbmH	304,614.70	-	304,614.70
SanLucar Fruit, S.L.U.	4,687,264.69	-	4,687,264.69
SanLucar Fruit France, S.A.R.L.	221,845.74	-	221,845.74
SanLucar Vertrieb Deutschland, GmbH. (formerly SanLucar Fruit Import, GmbH.)	(252,837.32)	-	(252,837.32)
SanLucar Fruit Import Netherlands, B.V.	6,210,854.77	-	6,210,854.77
Consorcio SanLucar Group, S.L.	12,390.13	435.00	12,825.13
SanLucar Deutschland GmbH.	468,269.33	155,258.40	623,527.73
SanLucar Obst & Gemüse Handels, GmbH.	383,979.75	368,921.72	752,901.47
SanLucar Fruit To Go, GmbH	97,083.50	97,083.50	194,167.00
SanLucar Manufaktur, GmbH	150,635.90	150,635.90	301,271.80
Victoria Fruit Handels, GmbH.	545,581.34	545,581.34	1,091,162.68
SanLucar Italia, S.R.L.	(683,377.41)	-	(683,377.41)
Frutta Natura, S.R.L. (formerly SanLucar Italia Berries, S.R.L.)	(49,550.65)	-	(49,550.65)
La Cinquième Saison, S.A.	2,504,326.72	2,406,117.83	4,910,444.55
Santa María Fruit, S.L.	(74,962.60)	(72,022.89)	(146,985.49)
SanLucar Tunisia, S.A.R.L.	(84,581.23)	-	(84,581.23)
SanLucar Services, S.A.R.L.	(191,340.55)	-	(191,340.55)
SanLucar Flor'alia, S.A.	(553,927.51)	-	(553,927.51)
SanLucar South Africa, (Pty), Ltd.	688,756.86	-	688,756.86
SanLucar South Africa Citrus Pty, Ltd.	(125,729.23)	399,509.90	273,780.67
SanLucar Ecuador, S.A.	43,531.97	-	43,531.97
Lexkingsa, S.A.	(62,702.32)	-	(62,702.32)
Quilziolli, S.A.	(628,951.11)	-	(628,951.11)
Les Perles du Desert, S.A.	(82,057.12)	-	(82,057.12)
SanLucar De Hoek (Pty), Ltd	(17,461.60)	(2,139.69)	(19,601.29)
Berry Selections, S.L.	(262.98)	(262.98)	(525.96)
Agrícola Dehesa de Baños, S.L.U. (formerly Agrícola Uniqua, S.L.U.)	847,329.28	-	847,329.28
Shares Co. RH & SLServices, S.A.R.L.	(375,475.96)	-	(375,475.96)
SanLucar Morocco, S.A.R.L., Associe Unique	(30,297.55)	-	(30,297.55)
Looking4fruit, GmbH.	(4,236.56)	-	(4,236.56)
Uniqua Fruit, S.L.U. (formerly Hortofrutícola Lucinala, S.L.U.)	18,977.89	-	18,977.89
Total	13,788,743.01	4,049,118.03	17,837,861.04

Tax aspects.

The tax burden imposed on each one of the Group companies per country in relation to its tax base, is as follows:

Group company	BAI + Adjustments	GIS	%
Spain			
Mamaritz	-105,614.66	24,345.66	-23.05%
The Roetzer Family	406,152.94	-101,538.24	-25.00%
SanLucar Fruit	1,716,754.74	413,125.63	24.06%
SanLucar Factory	-	-	0.00%
Consorcio SanLucar Group	12,825.13	-	0.00%
Berry Selections	-525.95	-	0.00%
Santa María Fruit	-179,695.77	32,710.28	-18.20%
Dehesa de Baños	1,129,772.38	-282,443.10	-25.00%
Uniqua	25,303.86	-6,325.97	-25.00%
France			
SanLucar Fruit France	251,845.74	-	0.00%
Austria			
SanLucar Obst&Gemüse	1,013,969.57	-261,068.10	-25.75%
Fruit to Go	198,326.99	-4,160.00	-2.10%
SanLucar Manufaktur	301,271.80	-	0.00%
Victoria Fruit Handelset	1,298,251.77	-207,089.10	-15.95%
Italy			
SL Italia	-683,377.41	-	0.00%
SL Italia Berries	-49,550.65	-	0.00%
Ecuador			
SL Ecuador	134,686.92	-91,154.95	-67.68%
Lexkingsa	-21,713.17	-40,989.15	188.78%
Quilziolli	-628,951.11	-	0.00%

Group company	BAI + Adjustments	GIS	%
Tunisia			
La Cinquième Saison	4,000,905.20	-176,125.85	-4.40%
Shares & Co	-375,475.96	-	0.00%
Les Perles du Desert	-82,057.12	-	0.00%
SanLucar Tunisie	-84,367.23	-214	0.25%
SanLucar Tunisie Services	-191,126.55	-214	0.11%
SanLucar Flor'alia	-553,744.08	-183.43	0.03%
South Africa			
SanLucar South Africa	968,464.31	-	0.00%
SanLucar South Africa Citrus	273,780.67	-	0.00%
SanLucar DeHoek	-299,308.74	-	0.00%
Germany			
SanLucar Flowers, GmbH	-97,678.86	-	0.00%
SanLucar Vertrieb Deutschland	3,745,559.82	-385,347.14	-10.29%
SanLucar Deutschland	776,994.61	-153,466.88	-19.75%
Looking for Fruit	-4,236.56	-	0.00%
Morocco			
SL Morocco	-30,297.55	-	0.00%
Holland			
SanLucar Fruit Import Netherlands	8,255,074.77	-2,044,220.47	-24.76%
Total	21,122,219.85	-3,284,358.81	
Mamartiz CAC Figures	21,122,219.85	-3,284,358.81	

*Includes corporate income tax accrued during the year ended 30 June 2021.

9.2. Public subsidies received.

As stated in the information provided in the consolidated report, the movement that occurred under the state subsidies heading in the consolidated statement of financial position during the years ending 30 June 2021, 2020 and 2019, and the results attributed to the consolidated statement of the overall result are listed below (in euros):

Financial year 2020-2021

Organisation	Initial Initial	Final Initial	Net additions of the financial year	Transfers to results	Final Final
Tunisian organisations	1,732,242.30	730,185.73	181,317.67	(157,475.62)	754,027.78
Total	1,732,242.30	730,185.73	181,317.67	(157,475.62)	754,027.78

Financial year 2019-2020

Organisation	Initial Initial	Final Initial	Net additions of the financial year	Transfers to results	Final Final
Tunisian organisations	1,550,924.64	990,367.47	(103,110.31)	(157.071,42)	730,185.73
Total	1,550,924.64	990,367.47	(103,110.31)	(157.071,42)	730,185.73

Financial year 2018-2019

Organisation	Initial Initial	Final Initial	Net additions of the financial year	Transfers to results	Final Final
Tunisian organisations	1,652,942.05	1,122,095.20	12,277.12	(144.004,86)	990,367.47
Total	1,652,942.05	1,122,095.20	12,277.12	(144.004,86)	990,367.47

The sum recorded under "Assignment of subsidies of non-financial fixed assets and others" in the consolidated profit and loss statement for the years ending 30 June 2021, 2020 and 2019 amounts to EUR 157,475.62, EUR 157,071.42 and EUR 144,004.86, respectively.

In the financial years shown, the most significant capital subsidies received by the Group are those granted by Tunisian organisations to controlled companies located in Tunisia. At the date of closure of the financial years ended 30 June 2021, 30 June 2020 and 30 June 2019, the Group had complied with all the requirements to receive and have use of the subsidies stipulated above.

Annex 1. Next steps.

Status of Commitments Non-Financial Information Statement 2020/2021			
Action	Objectives to achieve	Due date	Status
Equality Plan	A new assessment of the current plan has been carried out.	December 2022	In progress
Risk management human rights	Assess the human rights risks identified throughout the Group.	December 2022	In progress. See chapter 3.3
Stakeholder mapping and dialogue	Priority stakeholders and evaluation parameters have been identified.	December 2022	In progress
Materiality assessment	Materiality analysis surveys have been created and meetings have been scheduled	December 2022	In progress
Review of the Code of Ethics	The Group Code of Ethics has been reviewed and updated.	April 2022	Will be resumed in January 2022. It was halted owing to a difference of opinion on the scope. The Code of Ethics is scheduled to be implemented by April 2022
Evaluation and monitoring of our fruit and vegetable suppliers	Analysis of the procedure with an interdepartmental working group. Improvements defined. Pilot project implemented.	June 2022	In progress
Technology, information systems and cyber security.	Upgrading of the company's technology and cyber security systems	June 2022	In progress
Code of Conduct	Supplement the Code of Ethics with a review of corporate values.	December 2023	Awaiting new values to be defined
Improvement in internal communication	Implementation of a new system to facilitate internal communication with employees.	December 2023	Seeking a new ERP system

Annex 2. Group companies.

Group companies	Participating companies		GRI indicators reported			
	Controlling company	External partners	Universal Standards (100 series)	Economic (200 series)	Environmental (300 series)	Social (400 series)
Spain						
Mamaritz, S.L.U.	X		X			
The Roetzer Family, S.L.U.	X		X			
SanLucar Fruit, S.L.U.	X		X	X	X	X
Consorcio SanLucar Group, S.L.	X	X	X			
Berry Selections, S.L.			X			
Santa María Fruit, S.L.	X	X	X		X	X
Uniqua Fruit, S.L.U.	X		X			
Agrícola Dehesa de Baños, S.L.U.	X		X		X	X
Germany						
Looking for Fruit GmbH	X		X			
SanLucar Vertrieb Deutschland GmbH	X		X	X	X	X
SanLucar Deutschland GmbH	X		X	X		X
SanLucar Fruit & Juice GmbH			X			
SanLucar Flowers GmbH	X		X			X
Holland						
SanLucar Fruit Import Netherlands BV	X		X			X
France						
SanLucar Fruit France, S.A.R.L.	X		X		X	X

Austria						
SanLucar Obst&Gemüse GmbH	X	X	X	X	X	X
Fruit to Go, GmbH	X	X	X			X
Victoria Fruit Handels, GmbH	X	X	X			X
SanLucar Manufaktur GmbH	X	X	X			X
Italy						
SanLucar Italia, S.R.L.	X		X			X
Frutta Natura, S.R.L.	X	X	X			
Tunisia						
La Cinquième Saison, S.A.	X	X	X	X	X	X
Shares & Co RH & Services, S.A.R.L.	X		X			
Les Perles du Desert, S.A.	X		X			X
SanLucar Tunisie, S.A.R.L.	X		X		X	
SanLucar Services, S.A.R.L.	X		X			
SanLucar Flor'alia, S.A.	X		X	X	X	X
Ecuador						
SanLucar Ecuador, S.A.	X		X			X
Lexkingsa, S.A.	X		X	X	X	X
Quilziolli, S.A.	X		X	X	X	X
Morocco						
SL Morocco, S.A.R.L.	X		X			X

South Africa						
SanLucar South Africa, (Pty) Ltd	X		X			X
SanLucar South Africa Citrus (Pty) Ltd	X	X	X	X	X	X
SanLucar DeHoek (Pty) Ltd	X	X	X	X	X	X
SanLucar Patensie (Pty) Ltd			X			



Annex 3. Area of land, warehouses and offices.

The total area per country for the farms, warehouses or offices taken into account to calculate the environmental indicators is shown below.

Offices and warehouses	
Country	Area (m ²)
Spain	11,000
Germany	10,466
Austria	1,153

Farms	
Country	Area (ha)
Spain	209.85
Ecuador	163.00
South Africa	521.98
Tunisia	87.79



Annex 4. Summary of GRI indicators.

GRI Standards	SDG	Global Compact Principles	GRI Standards Definition	Results 2020/2021
102-1			Name of organisation	SanLucar is the name of the Group of companies, whose parent company is Mamaritz S.L.U. The report is created by SanLucar Fruit S.L.U See chapter 2.5
102-2			Activities, brands, products and services	SanLucar imports, exports and markets different fruits and vegetables from various origins to multiple destinations. See chapter 2.2
102-3			Location of head office	Head office: Serra Llarga 24, 46530 Puzol (Valencia, Spain) See chapter 2.5
102-4			Location of the operations	See chapter 2.4
102-5			Ownership and legal form	See chapter 2.2
102-6			Markets served	See chapter 2.4
102-8	8, 10	1, 2, 3, 4, 5, 6, 10	Information on employees and other workers	See chapter 5
102-10			Significant changes in the organisation and its supply chain	See chapter 2.7
102-12		1, 2	External initiatives	See chapter 6

GRI Standards	SDG	Global Compact Principles	GRI Standards Definition	Results 2020/2021
102-13			Membership in associations	Red Española del Pacto Mundial, UPJ e.V. Netzwerk für Corporate Citizenship und CSR, AEBE (Asociación de Exportadores de Banano del Ecuador), respAct Österreich.
102-14			Declaration of senior executives responsible for taking decisions	See Renewal of commitment letter
102-15			A description of the main impacts, risks and opportunities	See chapters 2.5 and 2.6
102-16	16		A description of the values, principles, standards and norms of conduct of the organisation.	See Mission, Vision, Values and Code of Ethics in chapters 2.1, 3.3 and 3.4
102-17			Advisory mechanisms and ethical concerns	See chapter 5
102-18			Governance structure	In March 2020, Walter Reifenröther took up the position of Managing Director and heads up the leadership team, reporting to Stephan Rötzer. Armin Rehberg joined the company as Chief Operating Officer in early 2021 with a focus on the company's sales activity. The company is managed by Armin and Walter, reporting to Stephan as founder and chairman of the SanLucar Group. Jorge will continue to support Stephan in this role as co-founder of the Group.

GRI Standards	SDG	Global Compact Principles	GRI Standards Definition	Results 2020/2021
102-23	16		Chair of the highest governing body	See chapter 2.7
102-32			Role of the highest governance body in the preparation	See chapter 1
102-40			List of stakeholders	See chapter 2.3
102-41	8	1, 2, 3, 4, 5, 6	Collective bargaining agreements	See chapter 3.4
102-44			Key topics and concerns raised	The CIA (workers committee) has received the following topics and concerns: employee turnover, availability of cutlery in the kitchen during lunchtime, a sense of insecurity regarding COVID-19 by employees working in the office, definition of salary bands.
102-45			Entities included in the consolidated financial statements	See chapter 2.7
102-50			Reporting period	1 July 2020 - 30 June 2021
102-51			Date of most recent report	1 July 2019 - 30 June 2020

GRI Standards	SDG	Global Compact Principles	GRI Standards Definition	Results 2020/2021
102-45			Entities included in the consolidated financial statements	See chapter 2.7
102-50			Reporting period	1 July 2020 - 30 June 2021
102-51			Date of most recent report	1 July 2019 - 30 June 2020
102-52			Reporting cycle	Annual
102-53			Contact point for questions regarding the report	communicationcr@sanlucar.com
103-2		1, 2, 4, 5, 6, 7, 9	The management approach and its components	Throughout the report
201-1	2, 5, 7, 8, 9	1, 2, 3, 4, 5, 6, 7, 8, 9	Direct economic value generated and distributed	See chapter 9
203-1	2, 5, 7, 9, 11	1, 2, 3, 4, 5, 6, 7, 8, 9	Infrastructure investments and supported services	See chapter 6.1

GRI Standards	SDG	Global Compact Principles	GRI Standards Definition	Results 2020/2021
204-1	1, 8	1, 2, 3, 4, 5, 6	Proportion of expenditure on local suppliers	Austria: 19.33%, South Africa: 100%, Ecuador: for Lexkingsa SA and SanLucar Ecuador SA 100%. For Quilziolli SA: cannot be shown, data incomplete Spain, Germany y Tunisia: cannot be shown, data incomplete.
205-2	16	1, 2, 3, 4, 5, 6, 10	Communication and training on anti-corruption policies and procedures	There are no cases of corruption reported in any of the Group companies.
302-1	7, 8, 12, 13	1, 2, 3, 4, 5, 6, 7, 8, 9	Energy consumption within the organisation	See chapter 7
303-1	6	1, 2, 7, 8, 9	Extraction of water per source	See chapter 7
304-1	6, 14, 15	1, 2, 7, 8, 9	Operations centres owned, leased or managed located within or adjacent to protected areas or areas of high biodiversity value	None of our production areas are located in protected areas

GRI Standards	SDG	Global Compact Principles	GRI Standards Definition	Results 2020/2021
306-1	6, 12, 14	1, 2, 7, 8, 9	Water discharge by quality and destination	See chapter 7 Note: the volume of water discharge by quality and destination is not shown in this report.
306-2	3, 6, 12	1, 2, 3, 4, 5, 6, 7, 8, 9, 10	Waste by type and disposal method	See chapter 7
308-1		7, 8, 9	New suppliers that were screened using environmental criteria	100%
401-1	5, 8, 10	1, 2, 3, 4, 5, 6, 10	New employee hires and employee turnover	See chapter 5
401-2	3, 5, 8	1, 2, 3, 4, 5, 6, 10	Benefits granted to full-time employees that are not provided to part-time or seasonal employees	The same defined benefits apply in all countries regardless of whether the contract is full-time or part-time.
401-3	5, 8	1, 2, 3, 4, 5, 6	Parental leave	See chapter 5
403-1	8	1, 2, 3, 4, 5, 6	Worker representation in formal worker-company health and safety committees	See chapter 3.4

GRI Standards	SDG	Global Compact Principles	GRI Standards Definition	Results 2020/2021
403-2	3, 8	1, 2, 3, 4, 5, 6, 10	Types of accidents and accident frequency rates, occupational illness, days lost, absenteeism and number of deaths due to occupational accident or disease	See chapter 5
404-1	4, 5, 8	1, 2, 3, 4, 5, 6	Average hours of training per year per employee	See chapter 5
405-1	5, 8	1, 2, 3, 4, 5, 6	Diversity of governance bodies and employees	See chapter 5
406-1	5, 8, 16	1, 2, 3, 4, 5, 6, 10	Incidents of discrimination and corrective actions taken	No cases in any of the subsidiaries
407-1	8	1, 2, 3, 4, 5, 6	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	See chapter 3.3

GRI Standards	SDG	Global Compact Principles	GRI Standards Definition	Results 2020/2021
408-1	8, 16	1, 2, 3, 4, 5, 6, 10	Operations and suppliers at significant risk for incidents of child labour	See chapters 3.3
409-1	8	1, 2, 3, 4, 5, 6	Operations and suppliers at significant risk for incidents of forced labour	See chapters 3.3
410-1	16	1, 2, 3, 4, 5, 6, 10	Security personnel trained in human rights policies or procedures	No training has been provided in countries where there are security personnel
411-1	2	1, 2, 7, 8, 9	Cases of violations of rights of indigenous peoples	The organisation does not operate in regions where there are indigenous peoples.
412-1		1, 2, 4	Operations subject to human rights impact assessments or reviews	See chapter 3.3

GRI Standards	SDG	Global Compact Principles	GRI Standards Definition	Results 2020/2021
412-2		Training of employees on human rights policies or procedures	<p>Total number of hours in the reporting period allocated to training on human rights policies or procedures and aspects of human rights relevant to operations.</p> <p>Percentage of employees in the reporting period who received training on human rights policies or procedures and aspects of human rights relevant to operations.</p>	<p>See chapter 5</p>
413-1		8, 9	<p>Operations with the participation of the local community, impact assessments and development programmes</p>	<p>Spain: El Puchero solidarity kitchen and home delivery of food and hygiene products in the city of Valencia during the pandemic. Ecuador: Academic support in the primary school Miguel Suárez Seminario in Pueblo Viejo and virtual workout during the pandemic. Germany: Dual training in Spain: technical managers in foreign and wholesale trade. Tunisia: adequacy of sanitary facilities and shared spaces for employees. Health provision for employees.</p> <p>See chapter 6</p>

GRI Standards	SDG	Global Compact Principles	GRI Standards Definition	Results 2020/2021
414-1	5, 8, 16	1, 2, 3, 4, 5, 6, 10	New suppliers that were screened using social criteria	See chapter 3
416-2		1	Cases of non-compliance concerning health and safety impacts of product and service categories	No cases of non-compliance reported
417-1	12	7, 8, 9	Requirements for products and service information and labelling	100% of the products are subject to the required information. Regulated, among others, by the EU 543/2011 or UNECE 2011 and EU 1169/2011 labelling standard and specifications. In addition to IFS, QS, ISO 9001 certifications and current legislation.
417-3	16	1, 2, 3, 4, 5, 6, 10	Cases of non-compliance relating to marketing communications	No cases of non-compliance reported
419-1	16	1, 2, 3, 4, 5, 6, 10	Non-compliance with laws and regulations in the social and economic spheres	No cases of non-compliance reported



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