

PURCARI WINERIES PUBLIC COMPANY LIMITED

SUSTAINABILITY REPORT 2024

Disclaimer: All figures and monetary amounts presented in this Sustainability Report are expressed in Romanian Lei (RON), unless otherwise stated.

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Chapter 1. ESRS 2 General Disclosures

1.1. Basis for preparation

BP-1 – General basis for preparation of sustainability statements

The 2024 Sustainability Statement of Purcari Wineries Group - official name Purcari Wineries Public Company Limited - has been prepared on a consolidated basis, containing non-financial data of all its subsidiaries.

The reporting scope aligns with the structure of the Group included in the Consolidated Financial Statements for the financial year ended 31 December 2024.

The period covered by the non-financial reporting is the same period covered by the Consolidated Financial Statements of Purcari Wineries.

Some subsidiaries are currently non-functional or have limited activity and, therefore, have been excluded from this year's report. These include Vinorum, West Circle, Ecosmart Union SA (as of July 2024), Domeniile Cuza (the company rents and uses resources from Vinaria Bostavan), Casa Purcari (not yet operational), Purcari Foundation (due to its size, uses resources from Vinaria Purcari), and Purcari Wineries Ukraine.

Relevant direct and indirect upstream and downstream business relationships identified as material are covered within the scope of this report. This includes vendors from the upstream value chain (supplies of raw materials, components, procurement processes, logistics, human rights practices) and downstream value chain (distribution and transportation of finished products). For more information on the extent of the materiality assessment upstream and downstream, please refer to section SBM-3 of this chapter.

Purcari Wineries has not chosen to withhold confidential information corresponding to intellectual property, know-how or the results of innovation in accordance with ESRS 1 section 7.7. Additionally, no information has been omitted as a result of impending developments or matters in the course of negotiation.

BP-2 – Disclosures in relation to specific circumstances

The Group experienced changes in its reporting methods over previous periods. In 2023, it adopted the Global Reporting Initiative (GRI) to align with best practices. From 2024, the Group has decided to voluntarily implement the latest Corporate Sustainability Reporting Directive (CSRD) standards to enhance its reporting framework in accordance with the most recent European Sustainability Reporting Standards (ESRS) requirements.

Apart from the ESRS, the Group used the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and specific reporting requirements outlined by the EU Taxonomy Regulation 2020/852 (Delegated Act on Climate No. 2139/2021) for its first analysis of climate risks. In addition, GHG Protocol has been employed for calculating the Group's carbon footprint. Where estimations have been utilized in the reported metrics, this has been explicitly mentioned in the accompanying methodology.

1.2. Governance

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

The composition of the administrative, management and supervisory bodies of Purcari Wineries PCL, their roles and responsibilities and access to expertise and skills regarding sustainability matters are presented in the section below.

The Board of Directors of Purcari Wineries is composed of 2 Executive Directors and 5 Non-executive Directors, of whom 4 are Independent (57%). The Board members possess a diverse range of expertise and experience relevant to sustainability matters pertaining to the wine industry and the markets in which the company operates, financial services and strategy, legal and corporate governance, stakeholder engagement, digital transformation and business consulting. A detailed account of the board composition and relevant expertise is presented in the table below.

Table 1. The composition of the Board of Directors and members' roles

Board member	Position	Relevant experience
Victor Bostan	CEO, Founder of Purcari Wineries Group, Executive Director	<ul style="list-style-type: none"> Over 35 years in the wine industry, including founding and leading successful wineries in Moldova and Russia. Expertise in wine technology and business development, crucial for guiding the implementation and development of sustainable practices in wine production.
Alexandru Filip	Deputy CEO, Member of the ESG Committee, Executive Director	<ul style="list-style-type: none"> Nearly two decades in finance and management consulting, with leadership roles in digital technology practices. Background in economics and finance, essential for guiding the development in a sustainable direction by integrating sustainability into financial and operational strategies.
Vasile Tofan	Non-executive Director	<ul style="list-style-type: none"> Extensive experience in consumer goods and technology sectors, with a focus on growth-enhancement projects in emerging markets. Background in business development, marketing strategy, and capability building, relevant for guiding development in a sustainable direction and driving impactful sustainability initiatives.
Ana-Maria Mihaescu	Chairperson of the Audit Committee, Member of the Nomination and Remuneration, and ESG Committee, Non-executive, Independent Director	<ul style="list-style-type: none"> Extensive experience within the World Bank Group, overseeing activities in multiple European countries. Experience in non-executive directorships and volunteer activities, focusing on sustainability and corporate governance, crucial for overseeing development in a sustainable direction.
Raluca Ioana Man	Chairperson of the ESG Committee, Non-executive, Independent Director	<ul style="list-style-type: none"> Founder of a business consulting company specializing in branding, reputation management, and business development. Leadership roles in various organizations and initiatives, providing valuable expertise for overseeing development in a sustainable direction through strategic branding and marketing.

Neil McGregor	Chairperson of the Nomination and Remuneration Committee, Non-executive, Independent Director	<ul style="list-style-type: none"> • Legal expertise with extensive experience in Romania and neighbouring countries. • Expertise in corporate governance and stakeholder relations, crucial for overseeing development in a sustainable direction, whilst ensuring compliance with sustainability standards and ethical practices.
Paula Catalina Banu	Member of the Audit and ESG Committee, Non-executive, Independent Director	<ul style="list-style-type: none"> • Legal counsel with expertise in commercial, corporate, and business development matters. • Expertise in legal and business development coupled with experience in the pharmaceutical industry, essential for overseeing the development of the company in a sustainable direction.

Overall, the board ensures ethical business conduct via adherence to the BVB Code of Corporate Governance and provides oversight from Audit Committee and ESG Committee. The board members leverage their diverse expertise in wine technology, business development, legal counsel, branding, finance, and corporate governance to oversee and implement sustainability matters within the Purcari Wineries Group.

Representation of employees and other workers

Employees and other workers' interests are represented by their subsequent managers (first line managers) and the Human Resources Department (HR). Ultimately, the decision-making process is overseen by the Board of Directors (specifically by the Committee of Nomination and Remuneration).

Board's gender diversity

The Group's Board of Directors, as presented above, is composed of 57% men and 43% women. The average ratio of female to male board members is 3:4 or 0.75.

Regarding C-Suite Executives, we have the following gender diversity:

- Chief Executive Officers: 100% male
- Executive-level managers, heads of business lines, divisions and main functions, i.e. Chief Financial Officer (CFO), Chief Operating Officer (COO), General Counsel, Chief Information Officer (CIO) etc.: 82% male and 18% female.

During Q3 2024, the compositions of the Executive-level management became 100% male.

Heads of departments/units are represented by 66% male and 34% female employees.

The administrative, management and supervisory bodies' responsibilities for oversight of IROs

At Purcari Wineries Group, oversight of impacts, risks and opportunities (IROs) is assigned primarily to the Board of Directors, as it holds ultimate responsibility for overseeing the company's approach to managing impacts, risks, and opportunities. This includes approving strategies and ensuring compliance with regulatory frameworks.

Purcari Wineries' Board follows Bucharest Stock Exchange's Code of Corporate Governance. The Board ensures an efficient risk management and internal control system, sets principles and approaches for it, and arranges regular independent internal audits. An independent audit committee is established to ensure financial reporting integrity and the effectiveness of the internal control system, including both internal and external audits.

Therefore, Purcari Wineries Public Company Limited has in place an Audit Committee - a specialized committee operating under the Board, responsible for detailed oversight of financial and non-financial risks.

The Audit Committee

The Committee consists of at least three members of the Board of Directors, with the provision that a majority of the members of the Audit Committee, including its Chairperson, must meet the independence criteria. At least one Member of the Audit Committee must be qualified in accounting and auditing. At least one Audit Committee Member must have expertise and skills in the industry in which the Company operates. The Committee Members are appointed for a period corresponding to the length of the Board of Directors' term of office.

The Audit Committee has a monitoring and advisory role, and its mission consist of monitoring the financial reporting process and assisting the Board in carrying out its tasks related to financial reporting, internal control, and risk management. The Audit Committee has the powers and responsibilities for the carrying out of the duties set forth in Bucharest Stock Exchange's Corporate Governance Code and Regulations, terms of reference, policies, resolutions, rules and other by-laws and internal documents of the Company. The Audit Committee operates in line with and applies section 78 of the Cyprus Auditors Act, 2017.

The Audit Committee is composed by: Ana Maria Mihaescu (Chairperson), Neil McGregor (Member), Paula Catalina Banu (Member), Vasile Tofan (Member).

Risks (depending on type) can also be overseen by the Nomination and Remuneration and ESG Committees.

The Nomination and Remuneration Committee

The Nomination and Remuneration Committee consists of at least three members of the Board of Directors, of whom at least one member must satisfy the independence criteria and be appointed in the manner provided for the Group's Articles of Association, who serves as the Chairperson. The Nominations and Remuneration Committee Members are appointed for a term corresponding to the Board of Directors' term of office.

The Nomination and Remuneration Committee has an organizational and supervisory role and is responsible for the evaluation of the balance of skills and knowledge, experience and diversity of the Board, periodical review of the Board's structure and identifying potential candidates to be appointed as Directors. The Committee also determines and agrees with the Board of Directors the framework and board policies for the remuneration of the Group's Chairman, Directors, CEO, Deputy CEO, CFO, and other members of the senior management team. The Committee operates in line with Purcari Wineries' Articles of Association and Remuneration Policy.

The Nomination and Remuneration Committee consists of: Neil McGregor (Chairperson), Ana Maria Mihaescu (Member), Paula Catalina Banu (Member), Vasile Tofan (Member).

The ESG Committee

The ESG Committee consists of at least three members of the Board of Directors, of whom at least one member represents the Nomination and Remuneration Committee, mitigating the risk of separating ESG discussions from the Company's broader business, all appointed in the manner provided by the Group's Articles of Association. The ESG Committee Members are appointed for a term corresponding to the Board of Directors' term of office.

The ESG Committee has an advisory role, and its purpose is to assist the Board of Directors and provide oversight, guidance, and direction on environmental, social and governance (ESG) issues, pertaining to the Company's operations and business strategy. The ESG Committee ensures that the Company operates in an ethical, sustainable, and responsible manner, with the objective of integrating ESG goals into the Company's decision-making process and improving its ESG performance.

The ESG Committee consists of: Raluca Ioana Man (Chairperson), Ana Maria Mihaescu (Member), Paula Catalina Banu (Member), Alexandru Filip (Member).

The responsibilities of administrative, management, and supervisory bodies for managing impacts, risks, and opportunities are generally defined in the Company's governance documents.

The Group's supervisory body is defined by the Memorandum and Articles of Associations of the Group, the Internal Regulation of the Board of Directors, and the Code of Corporate Governance provided by Bucharest Stock Exchange. According to BVB's Code of Governance, The Company's Board should ensure that a formal, rigorous and transparent procedure is put into place regarding the appointment of new members to the Board. There should be a clear division of responsibilities between the Board and the executive management. The Board and its committees should have the appropriate balance of skills, experience, gender diversity, knowledge and independence to enable them to effectively perform their respective duties and responsibilities.

The Board of Directors has a defined mandate to oversee the company's approach to impacts, risks and opportunities.

Management's role in monitoring IROs

The Group's management team is integral to ensuring that the governance processes, controls, and procedures are effectively implemented to monitor, manage, and oversee the Company's impacts, risks, and opportunities across all operational areas.

The Executive Management Team, led by the Deputy CEO and CEO, is responsible for aligning company operations with the defined strategies (including the 2027 2X by 200 strategy).

The team collaborates closely with the Board of Directors and its committees, providing detailed reports on progress and recommendations for addressing critical impacts, risks, and opportunities. Cross-functional teams are established to handle specific projects, ensuring alignment between management decisions and governance frameworks. The Committee within the board that oversees board mandates and other aspects related to policies is the Nomination and Remuneration Committee. The Committee also determines and agrees with the Board of Directors the board policies and remuneration of the Group's Board and Senior Management Team.

At the management level, the responsibility for managing IROs is delegated to specific managers, officers, or directors, depending on their functional expertise. Oversight of these responsibilities is exercised by the Executive Management Team, chaired by the CEO. The CEO monitors departmental activities through regular reporting and the approval of key strategic initiatives.

In parallel, the Board of Directors retains a supervisory role, overseeing the performance of the Executive Team to ensure the company's actions remain aligned with Purcari Wineries' strategic objectives and regulatory obligations.

Management ensures that the governance processes, such as risk assessment and monitoring are embedded in daily operations. Regular cross-functional Senior Management Team meetings are held to review progress on initiatives and risk mitigation measures

Additionally, the role of oversight over the governance processes, controls and procedures used to monitor, manage and oversee IROs is not delegated to a single management-level position. Instead, responsibilities are distributed across the Group's specialized committees (e.g., Audit, ESG), each tasked with overseeing a specific domain of risk or impact, as previously described.

Reporting lines to the Board of Directors

The Executive Management Team is responsible for leading the Group's operational and strategic initiatives across departments. This team reports to the CEO, Deputy CEO, and CFO, who are collectively responsible for ensuring alignment between operational execution and the Group's overarching strategic direction.

The Deputy CEO and CEO work closely with the CFO to harmonize financial and non-financial strategies, including risk-related matters. Performance reports are prepared by the Executive Team and reviewed by the CEO and Deputy CEO. These are subsequently presented to the Board of Directors. Importantly, both the CEO and Deputy CEO serve as members of the Board, further strengthening the link between executive actions and board-level oversight.

Oversight is reinforced through internal audits and periodic performance reviews, fostering transparency and accountability at all levels.

Internal controls

Weekly Senior Management Team meetings facilitate cross-departmental information exchange and coordination, ensuring all relevant teams remain informed of ongoing risks, opportunities, and strategic developments.

Updated from functional leaders are further escalated during quarterly Board of Directors meetings, allowing for comprehensive oversight. These meetings include inputs from committees composed of representatives from finance, operations, and legal, fostering a holistic and well-informed approach to managing IROs.

In cases of force majeure or critical matters that require urgent attention, the Board of Directors may convene for an extraordinary meeting. Such meetings are held only if the topic is deemed significant and the timing is coordinated in advance with the Corporate Secretary and Board members, ensuring efficient and focused deliberation.

Oversight of target setting and progress

The Board of Directors reviews and approves the Group's strategic and operational targets during the annual planning sessions, ensuring alignment with the company's long-term vision and stakeholder expectations.

In collaboration with functional leaders such as the CFO, the CEO and Deputy CEO lead the definition of measurable and time-bound targets. Input from all departments is incorporated to ensure these targets are realistic and applicable across business units.

Progress toward these targets is tracked through quarterly reports submitted by the CFO to the Audit Committee and the full Board of Directors. The Audit Committee evaluates the effectiveness of controls and procedures in meeting set targets, as well as ensuring alignment of progress with the company's risk appetite and material impact areas.

Annual reviews are conducted by the Board to evaluate overall performance and revise targets or strategies where necessary. Progress updates are also communicated to stakeholders – such as investors and employees – via quarterly reports, press releases, and other public disclosures (Bucharest Stock Exchange).

The sustainability-related expertise within Purcari Group

As stated above, Purcari Wineries' Board of Directors and Executive Management Team encompass a diverse array of professional backgrounds, including finance, legal, operation, and international business, which collectively contribute to effective strategic and sustainability oversight. A key component of this governance structure is the ESG Committee, which plays a pivotal role in shaping and monitoring the Group's sustainability agenda.

Beyond governance structures, the group integrates sustainability into its operational functions. The Group's Director of Development, Research and Innovation is well-acquainted with sustainability principles and actively works to incorporate them into its innovation pipeline. This includes developing sustainable vineyard practices, implementing water-efficient technologies, and experimenting with eco-friendly vineyard treatment and product packaging.

The company continued investing in internal sustainability-related capacity-building. In 2023, one full-time equivalent (FTE) employee completed formal training in sustainable tourism, supporting the Group's efforts to align its tourism and hospitality offerings with sustainability best practices. As of 2024, another FTE is undergoing specialized training in ESG, strengthening internal expertise on regulatory compliance, materiality assessment, and sustainability data management.

While these initiatives represent important progress, Purcari Wineries continue to assess the depth and breadth of sustainability-related expertise across the Board and SMT. Where needed, the company is prepared to strengthen capabilities through targeted upskilling, ESG-specific onboarding, and access to external experts.

The development and availability of sustainability-related expertise across governance and operational layers are essential for effective oversight of the Group's material impacts, risks, and opportunities (IROs). These IROs encompass critical topics such as climate change adaptation, sustainable water and energy use, biodiversity, packaging, employee well-being, responsible sourcing, and regulatory alignment.

Through the ESG Committee, the Board is equipped to provide informed oversight on sustainability-related strategic decisions. The R&D team's sustainability orientation ensures that innovation projects align with environmental and social performance goals, reinforcing the Group's ability to create long-term value responsibly.

The integration of trained personnel in sustainable tourism and ESG further supports the day-to-day implementation of the Group's sustainability roadmap. These roles help bridge the gap between strategy and execution, facilitating continuous improvement and enabling the Group to meet evolving stakeholder and regulatory expectations.

By ensuring that both supervisory and executive functions are equipped with appropriate sustainability expertise, Purcari Wineries strengthens its governance approach and reinforces its commitment to responsible and transparent business practices.

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

In this section we disclose how the administrative, management and supervisory bodies are informed about sustainability matters and how these matters were addressed during the reporting period.

Purcari Wineries ensures structured and regular communication of material sustainability-related IROs to its governance bodies:

- The Board of Directors and its Committees (with emphasis on the Audit Committee) are informed during quarterly and/or exceptional meetings through comprehensive updates that include impacts, risks, opportunities (including ESG-related), effectiveness of policies, actions and targets implemented.
- The Executive Management Team, led by the CEO and Deputy CEO, holds weekly meetings to track ongoing developments, implement policies, and review key operational indicators, including sustainability-related initiatives (curated by the Group's Director of Development, Research and Innovation).
- Quarterly performance reports include detailed metrics, progress on strategy goals/targets, updates on material risks and due diligence, which are reviewed by the Audit Committee and escalated to the Board (further providing feedback to the Executive Management Team).
- Annual governance reviews are conducted by the Board to evaluate and enhance the company's oversight and effectiveness, with findings incorporated into Board discussions.

Key findings, including progress on company initiatives and risk mitigation (including sustainability-oriented projects), are disclosed through the company's Annual Report, ensuring transparency and accountability for all stakeholders.

Integration of ESG issues in strategic decision-making

The Board of Directors actively integrates Environmental, Social, and Governance (ESG) considerations into strategic planning and annual business reviews. This alignment ensures that long-term business objectives are in harmony with key sustainability goals, such as enhancing irrigation systems for climate resilience and implementing the Rara Neagra 2.0 replanting project.

For significant transactions, including vineyard acquisitions, investments, and mergers & acquisitions, the Executive Management Team collaborates with the Audit Committee to apply a comprehensive due diligence framework. This framework evaluates legal, environmental, operational, and climate-related factors to ensure informed decision-making. For more information on due diligence please refer to section [GOV-4](#).

Investment decisions involve careful consideration of trade-offs, such as balancing productivity enhancements with long-term environmental sustainability and biodiversity preservation.

Strategic initiatives are primarily refined through discussions at the Board level and recommendations from the Audit Committee. Additionally, stakeholder feedback, regulatory developments, and market dynamics play a crucial role in shaping these initiatives.

IROs addressed in 2024

The Chief Financial Officer (CFO) and the Senior Management Team, led by the Chief Executive Officer (CEO), are responsible for embedding material IROs within the company's enterprise risk management framework. The Board of Directors holds ultimate responsibility for ensuring that appropriate oversight and monitoring mechanisms are in place to track the company's performance and manage material IROs.

During the reporting period, the following governance structures engaged in the identification, monitoring, and response to material IROs:

- The Executive Management Team prepares detailed quarterly performance reports, including updates on key financial, operational, and sustainability KPIs. These are submitted to the Board and its Committees for review and strategic alignment.
- The Audit Committee reviews these reports to assess the effectiveness of internal controls, performance tracking, and risk mitigation systems. It ensures the accuracy and relevance of reported data and validates that monitoring systems meet both strategic and regulatory requirements.
- The ESG Committee, chaired by Ms. Raluca Ioana Man, tracks progress on ESG objectives and ensures alignment with the group's sustainability ambitions, reporting findings to the Board.
- External assurance providers, including third-party auditors, are engaged to verify performance and compliance with relevant standards (e.g., ISO certifications, GRI, local ESG requirements).

Material IROs addressed during the reporting period include:

- Climate-related risks: such as drought and water scarcity, addressed through irrigation upgrades and climate-resilient viticulture practices.
- Biodiversity and soil health: managed via sustainable replanting practices, reduced use of synthetic chemicals, and targeted R&D investment in environmentally responsible cultivation techniques.
- Workforce and social matters: including fair labour practices, seasonal worker conditions, and local employment initiatives.
- Sustainable product development: the R&D department actively integrates sustainability principles into new product initiatives and packaging solutions.
- Governance enhancement: through increased ESG awareness at the governance level and reinforced reporting structures, ensuring the material topics are escalated, monitored, and addressed with appropriate board-level oversight.

Performance insights are consistently shared across governance bodies during scheduled meetings. Board and stakeholder feedback is integrated into continuous improvement efforts, ensuring that decision-making remains responsive to evolving ESG risks and opportunities as well as regulatory developments.

Periodic reviews are conducted by the Executive Management Team to ensure that deviations from targets are identified early, and corrective actions are implemented. In certain cases, third-party auditors are engaged to validate performance and compliance with external standards such as those covered within the scope of ISO certifications.

Performance insights are shared with all governance bodies during regular meetings, fostering informed decision-making. Feedback from the Board and stakeholders is then used to adapt to evolving business and regulatory needs.

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

In this section we present information about the integration of its sustainability-related performance in incentive schemes (including climate-related considerations).

At the current stage, Purcari Wineries does not have incentive schemes explicitly linked to sustainability or climate-related performance metrics. However, performance-based compensation is in place as part of the Executive Management's remuneration package, and the framework allows for future integration of other indicators, including sustainability indicators as topics continue to evolve.

The executive remuneration package includes:

- A fixed component, reflecting the responsibilities and experience of the executive.
- A variable component (annual bonus), designed to reward performance against agreed key performance indicators (KPIs).
- Other long-term incentives such as restricted stock units or stock options, primarily intended to align management's interests with long-term shareholder value creation.

Incentive compensation is governed by the company's Remuneration Policy and reflects both Group-level performance and Company-level performance. The annual bonus is contingent on achieving predefined KPIs that typically relate to financial, operational, and strategic targets. While these currently do not include ESG-specific metrics, the company is actively assessing how to integrate material sustainability indicators – such as resource efficiency, employee development, and climate resilience – into future remuneration structures.

Climate-related considerations

As of the reporting period, no specific climate-related performance indicators are embedded in the remuneration of the administrative, management, or supervisory bodies. However, this is subject to periodic review, especially in light of growing stakeholder expectations and regulatory trends under the CSRD and EU Green Deal. Integration of such indicators may include metrics such as GHG emission reduction, energy efficiency improvements, or ESG rating performance.

Significant Shareholder clause

As stated above, executives who are Significant Shareholders – defined as individuals who directly or indirectly hold more than 10% of the company's shares – are excluded from receiving annual bonus payments and long-term success of the company. This ensures fair and balanced incentives across the executive team.

Governance and oversight

The Board of Directors holds ultimate responsibility for approving and overseeing the company's incentive schemes, ensuring they are aligned with long-term corporate goals and values. Recommendations for incentive structures are reviewed and vetted by:

- The Nomination and Remuneration Committee, which plays a leading role in designing, reviewing, and recommending changes to incentive frameworks. The committee ensures that schemes remain competitive, transparent, and aligned with both stakeholder expectations and market benchmarks.
- The Executive Management Team, led by the CEO and Deputy CEO, which periodically assesses how current schemes influence employee engagement, retention, and strategic delivery. Their inputs help ensure that schemes are not only effective but also reflective of the company's operational reality.

Once revised or updated, incentive schemes are communicated to all relevant stakeholders and form part of the company's broader performance management and employee engagement strategy.

Forward-looking approach

As part of its commitment to continuous improvement, Purcari Wineries is exploring the inclusion of sustainability-related KPIs in executive and management incentive schemes. This will be informed by the materiality assessment process, stakeholder expectations, and evolving regulatory guidance under ESRS, with the goal of reinforcing accountability and long-term value creation.

GOV-4 – Statement on due diligence

Purcari Wineries Group applies a structured due diligence process to identify, assess, address, and monitor material actual and potential IROs across its own operations and value chain. This section presents a mapped overview to ensure clarity and transparency regarding the due diligence process, how it is integrated and reflected throughout the sustainability statement.

Overview of the Due Diligence Process

1. Identification of Material Risks: A double materiality assessment is conducted to evaluate the company's environmental, social, and governance (ESG) impacts and risks. This includes topics related to climate change, water use, labour practices, and local community development.
2. Assessment and Prioritization: Impacts and risks are prioritized based on their likelihood and severity, focusing on areas such as climate change, community engagement, and ethical sourcing.
3. Mitigation and Remediation: Assessment of strategies and actions implemented to mitigate risks and enhance positive impacts, with progress tracked through key indicators.
4. Stakeholder Engagement: Mapping of stakeholder input to the due diligence process, demonstrating how feedback from employees, investors, has been incorporated into materiality assessments and action plans.

Purcari Wineries is committed to strengthening its due diligence practices. As sustainability regulation and stakeholder expectations evolve, we aim to improve transparency, expand

stakeholder participation, and integrate forward-looking sustainability performance metrics across operations and supplier relationships, going forward.

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

The main features of Purcari Wineries' risk management and internal control system in relation to the sustainability reporting process are disclosed in this section.

Purcari employs a general risk assessment approach to identify and evaluate risks associated with sustainability reporting. However, a dedicated risk management and internal control mechanism specifically tailored for sustainability reporting has not yet been formalized. Currently, the reporting process relies on manual coordination among various functional teams, including production, agriculture, human resources (HR), and legal. Risk prioritisation is conducted qualitatively, based on materiality and potential reputational, regulatory, or operational impact.

This approach lacks a fully digitalized control system or an audit trail for sustainability data. However, the ESG Officer is currently coordinating Group-wide data collection efforts and preparing the foundation for a more structured and auditable sustainability reporting process. This includes mapping existing data flows, identifying the key internal contributors, and building awareness around ESG responsibilities.

In parallel, plans are underway to assign clear internal responsibilities and design a governance structure around ESG data management. This will include the formalization of designated roles such as the ESG Officer, with a mandate to oversee data quality, consistency, and traceability across reporting cycles.

Additionally, there is an ongoing evaluation of governance models to formalise ESG oversight at the Board level. This may involve assigning specific responsibilities to the Audit Committee for providing assurance over ESG disclosures, the establishment of a cross-functional ESG Steering Group, or allocating strategic supervision of non-financial risks and due diligence to the ESG Committee at the Board level.

1.3. Strategy

SBM-1 – Strategy, business model and value chain

This section covers the disclosure of the elements of Purcari's strategy that relate to or impact sustainability matters, its business model and its value chain.

Purcari's purpose is to build a global wine-making champion dedicated to preserving and promoting globally the rich wine-making heritage and indigenous grape varieties of New Europe Wines.

Purcari Wineries Group specializes in the production, bottling, and sale of wines and brandy, focusing on premium quality and continuous innovation. The Group actively develops premium wine brands while expanding into newer segments such as sparkling and brandy. Production includes automated planning and real-time stock management, enhancing traceability and quality control from grape to bottle. Furthermore, Purcari is expanding its distribution channels in both organized and traditional trade sectors, executing targeted marketing initiatives to reinforce product brands and presence in leading HORECA outlets.

No significant products or services were removed during the reporting period, and efforts continued to diversify offerings under existing and new product lines.

Purcari operates in over 40 international markets, positioning its products as accessible luxury items. The most significant markets include Romania, Moldova, Poland, and Bulgaria, with targeted growth strategies for Americas, Asia, Africa, and the Middle East & Turkey, where portfolio adaptation and local preference alignment are pursued.

Customer groups include organized and traditional retail, premium HORECA channels, and direct-to-consumer channels via wine bars and winery experiences.

At the end of the reporting period, the Group employed 887 people across the countries where it has its main entities located, as follows:

- Romania: 152 (72 males/ 80 females)
- Moldova: 649 (380 males/ 269 females)
- Bulgaria: 86 (52 males/ 34 females)

In the reporting year, the Group achieved a total turnover of 382.3 million RON, as reported in the audited financial statements.

Sustainability-related goals

Purcari Wineries Group's sustainability-related goals are embedded in its strategic pillars, presented in its "2x by 200" Strategy, with objectives that span product innovation, market development, and stakeholder engagement, as well as expansion of our geographical reach, with a goal focused on winemaking with purpose, with targeted outcomes aimed at improving yields, securing high-quality grapes and leveraging innovative practices.

ENVIRONMENT

- ✓ Improve water treatment with modern water treatment stations in all the Group's wineries.
- ✓ Optimize consumption of water, energy, and reduce CO2 emissions in all wineries.

✓ Expand the irrigation systems: 300 ha at Purcari are complete; 700 ha are under development in the vineyard of Alexandru Ioan Cuza.

✓ Invest in ecological and biodynamic vineyards.

✓ Install additional solar panels (currently ~1 MWh installed) to increase sourcing of necessary power from renewable energy (aiming for up to 80%) and reduce dependency on grid.

SOCIAL

✓ Play an active role in rural regeneration in areas where we are present, while preserving and passing on cultural heritage (e.g., encourage and support access to viticultural and winemaking education for high-school graduates from our rural communities).

✓ Prioritize employee development through continuous training, skill enhancement, and career growth opportunities.

✓ Enhance well-being and quality of life at work, especially for blue-collar workers.

GOVERNANCE

✓ Secure key positions and implement a robust succession plan to ensure leadership continuity and long-term growth potential.

✓ Ensure transparent reporting, by providing regular, transparent reports on financial performance, sustainability efforts, and social impact to stakeholders and investors.

✓ Maintain Board Diversity and independence.

✓ Ensure executive compensation and incentives are aligned with long-term company performance and investor's return.

✓ Abide to ethical business practices. Enforce a code of conduct that promotes ethical behaviour, anti-corruption measures, and legal compliance throughout the organization.

Status regarding goals

Purcari Wineries Group has outlined several sustainability-related goals for the years leading up to 2027, with a strong focus on enhancing environmental performance, product innovation, and market presence across its core geographies: Moldova, Romania, and Bulgaria.

In Romania, we aim to extend our portfolio, increase wine-making capacity, and improve sustainability performance at Crama Ceptura. These efforts include reducing water and energy consumption and improving wastewater treatment. Investment in new product development – particularly in underpenetrated categories such as sparkling wines and brandy – are tied to our ambition to diversify offerings and meet evolving consumer preferences.

In Bulgaria, we are focused on relaunching and repositioning the Angel's Estate portfolio to better reflect customer needs and trends. Commercial excellence and market development go hand-in-hand with sustainability targets such as securing reliable water access and reducing both water and energy usage. The adoption of advanced irrigation systems supports more efficient water use in our vineyards.

In Moldova, we aim to significantly scale our viticulture and production capabilities while embedding sustainability and innovation across operations. This includes the expansion of

irrigation networks, increased mechanization, and the integration of precision viticulture technologies such as drone monitoring, Geocarta mapping, and UVboost systems. Geocarta, a high-resolution electromagnetic soil mapping technology, allows for detailed understanding of soil composition and variability, enabling more precise vineyard planning, targeted interventions, and optimized resource use. The UVboost technology – an innovative, chemical-free treatment – helps reduce the need for synthetic treatments by enhancing the natural resistance of vines through targeted UV light exposure, contributing to more sustainable vineyard management. Additionally, we plan to develop the Rară Neagră 2.0 program to improve grape quality and availability. Increasing overall production capacity is also a key goal to enhance product quality and meet growing demand.

Significant markets include our home and regional markets – Moldova, Romania, and Bulgaria – as well as strategic international regions such as the Americas, Asia, Africa, and Turkey & the Middle East. In each of these regions, we pursue tailored strategies for profitable growth and commercial excellence, including adapting product portfolios to local consumer preferences, strengthening brand visibility, and improving distribution and execution.

Our customer groups are diverse, ranging from organized and traditional trade to customers of export partners and top HORECA channels. Notably, we aim to enhance customer engagement through experiential offerings such as wine bars, winery tours, and tasting experiences to foster stronger brand connection and encourage product trial.

Our sustainability-related goals are closely tied to our significant products and services, as well as our significant markets and customer groups. By improving the sustainability of our winemaking processes, expanding and innovating our product range, and elevating the customer experience, we are advancing our broader strategic and environmental objectives while supporting business growth in key markets.

Sustainability initiatives

Purcari Wineries Group is committed to sustainability and excellence in winemaking, with initiatives that address various sustainability issues, including climate change, water resources, biodiversity, and social governance.

Environmental Initiatives

In alignment with E1 – Climate Change, we are focused on reducing carbon emissions and increasing energy efficiency across all our operations. Ongoing efforts include the installation of modern water treatment systems and solar panels, with a target of covering up to 80% of our energy needs from renewable sources. Additionally, we have integrated Mythos and Ganimede fermentation tanks, which support a more sustainable vinification process by recycling the CO₂ naturally produced during fermentation. These tanks utilize the pressure and flow of captured CO₂ to gently mix the fermenting must, eliminating the need for mechanical stirring or external energy inputs. This not only lowers electricity consumption, but also reduces overall CO₂ emissions, contributing to more energy-efficient and environmentally responsible winemaking.

To address E3 – Water and Marine Resources, we are significantly expanding irrigation infrastructure, particularly through a major project at the Alexandru Ioan Cuza vineyard, aiming to cover 700 hectares. This ensures more sustainable water use and increased climate resilience of our agricultural practices.

To promote E4 - Biodiversity and Ecosystems, Purcari invests in ecological and biodynamic viticulture, which not only enhances grape quality but also supports local ecosystems.

Preserving indigenous grape varieties remains a core part of our biodiversity strategy, helping maintain the genetic heritage and adaptability of our vines.

Social Responsibility

From a social perspective, Purcari emphasizes the importance of its workforce (S1 - Own Workforce) by prioritizing employee development through continuous training and career growth opportunities. The company also plays an active role in rural regeneration, supporting access to viticultural education for high-school graduates in rural communities, thereby preserving cultural heritage.

Governance and Ethical Practices

In terms of governance (G1 - Business Conduct), Purcari ensures transparent reporting on financial performance and sustainability efforts, maintaining board diversity and independence. The company enforces a code of conduct that promotes ethical behavior and compliance with legal standards, which is essential for building trust with stakeholders.

Market and Customer Engagement

Purcari's sustainability-related goals are intricately linked to its significant products and services, particularly in the context of expanding its portfolio and enhancing customer experience (S4 - Consumers and End Users). The group aims to grow its premium brands and introduce new products in the Crama Ceptura range, targeting underpenetrated segments such as sparkling wines and brandy. This strategy is complemented by efforts to improve customer engagement through wine bars, winery tours, and tailored experiences.

Export Processes Development

Purcari operates in significant markets including the Americas, Asia, Africa, and Turkey & the Middle East, with specific strategies aimed at profitable growth and commercial excellence. By tailoring its product offerings to local taste preferences and improving distribution channels, Purcari is well-positioned to expand its presence in these key markets while aligning with its sustainability goals.

Purcari's business model and value chain

Purcari Wineries Group relies on a well-structured and diversified supply chain to support its core operations, encompassing grape cultivation, winemaking, packaging, and sales. In 2024, the Group procured goods and services across multiple countries, with strategic sourcing partnerships in Romania, Moldova, and Bulgaria.

The most material upstream sourcing categories include:

- Supplying Grape Farmers – both from Purcari's owned vineyards (2,050 ha) and long-term contracted growers;
- Oenological Material Suppliers – providing yeasts, additives, barrels, and lab equipment, procured from specialized suppliers, primarily in the EU;
- Packaging Material Suppliers – including glass bottle producers, label printers, and box manufacturers – sourced from vetted suppliers in Romania, Moldova, and Bulgaria;
- Vine Planting Material Suppliers – nurseries supplying certified planting material, with a focus on biodiversity and disease resistance;

- Equipment Material Suppliers – machinery for winemaking, fermentation (e.g., Ganimede and Mythos fermentation tanks, UVBoost treatment systems), and irrigation.

To secure quality and continuity of supply, Purcari Wineries engages in:

- Supplier vetting and audits;
- Long-term contracts with strategic partners;
- Local sourcing standards, particularly for grapes and labor;
- Investment in agronomic and viticultural innovation, including precision farming tools (e.g., drone monitoring, Geocarta mapping, UVboost systems).

Purcari's outputs are primarily wines and brandy, offered under multiple award-winning brands (Purcari, Crama Ceptura, Bostavan, Bardar, Angel's Estate). These products serve a variety of markets and customers, from retail and HORECA to tourism and direct-to-consumer.

Expected and current benefits for key stakeholders include:

- Customers: high-quality, sustainable wine products tailored to local taste preferences, with expanding wine tourism offerings (winery visits, tastings, cultural events);
- Investors: consistent revenue growth and margin improvement driven by strong brand equity, operational efficiency, and expansion into premium categories (e.g., sparkling wine, aged brandy). In 2024, the Group recorded sales revenue of approximately RON 185.2 million;
- Communities: rural employment, viticultural education initiatives, and support for cultural preservation (e.g., through traditional grape varieties);
- Employees: development opportunities, strong ESG culture, and inclusive workplace policies.

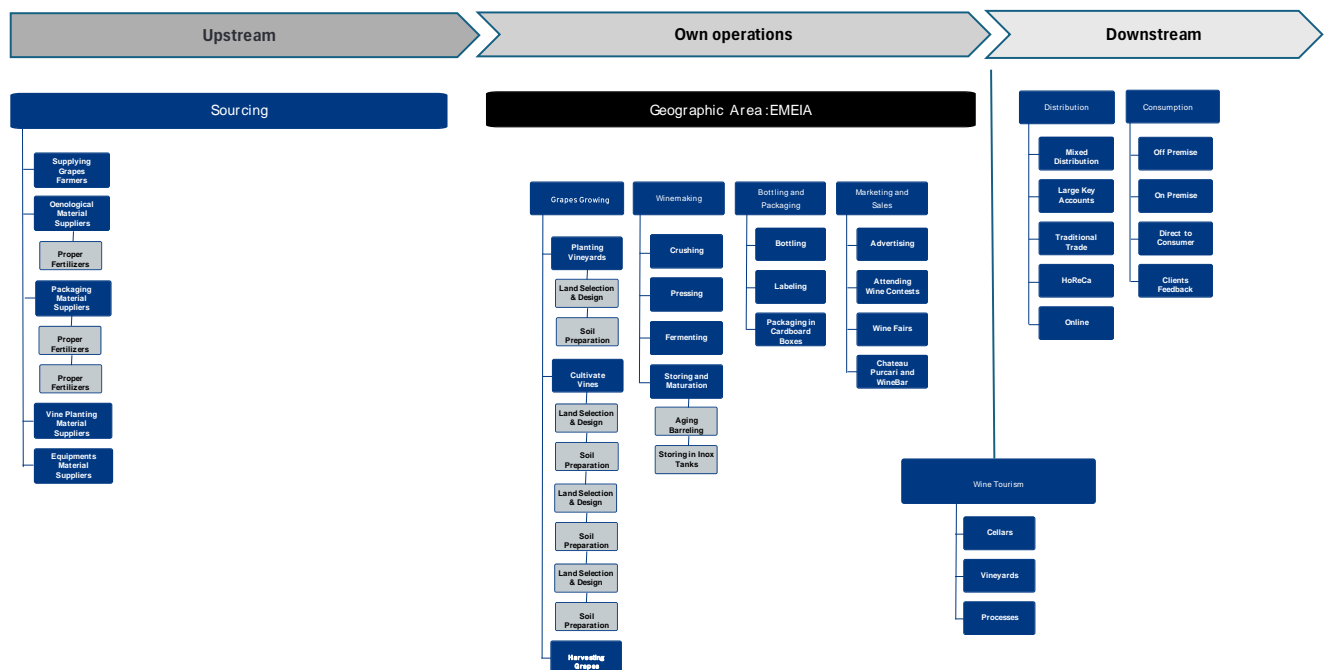
In 2024, the Group generated approximately RON 185.2 million in net sales revenue, with growth fueled by product diversification and new market penetration.

Purcari Wineries' value chain spans from vineyard to glass, integrated vertically across the wine production cycle. The Group operates primarily in Europe (Moldova, Romania, Bulgaria), with export channels reaching over 40 international markets, including Asia, North America, and the Middle East.

Table 2. Value chain mapping

	Upstream activities	Own operations	Downstream
Description of operations / activities	<p>During the 2024 Financial year, procurement of critical goods and services from suppliers across Moldova, Romania, Bulgaria, and beyond.</p> <p>Key sourcing categories:</p> <ul style="list-style-type: none"> - Supplying Grapes Farmers - Oenological Material Suppliers (yeasts, barrels, additives) - Packaging Material Suppliers (bottles, labels, boxes) 	<p>Purcari Wineries has main- office locations in 3 countries – Moldova, Romania and Bulgaria.</p> <p>Purcari Wineries' operations are conducted across Europe (EMEA). Includes all core business activities across the value chain.</p> <p>Four operational pillars:</p>	<p>In 2024, the Group generated approximately RON 185.2 million in net sales revenue, with growth fueled by product diversification and new market penetration.</p> <p>Wine Tourism (own operations + downstream):</p>

Business actors	<ul style="list-style-type: none"> - Vine Planting Material Suppliers (nurseries, certified clones) - Equipment Material Suppliers (fermentation tanks, bottling lines) 	<p>1. Grapes Growing:</p> <ul style="list-style-type: none"> - Planting Vineyards - Cultivating Vines - Harvesting Grapes <p>2. Winemaking:</p> <ul style="list-style-type: none"> - Crushing - Pressing - Fermenting - Storing and Maturation (including aging in oak barrels and storage in tanks) <p>3. Bottling and Packaging:</p> <ul style="list-style-type: none"> - Bottling - Labeling - Packaging in cardboard boxes <p>4. Marketing and Sales:</p> <ul style="list-style-type: none"> - Advertising - Attending wine contests and wine fairs - Promoting via Chateau Purcari & Purcari WineBar network <p>5. Wine Tourism (own operations + downstream):</p> <ul style="list-style-type: none"> - Wine Cellars, Vineyard Tours, Showcasing Winemaking Processes 	<ul style="list-style-type: none"> - Wine Cellars, Vineyard Tours, Showcasing Winemaking Processes <p>Key distribution channels:</p> <ul style="list-style-type: none"> - Mass Distribution - Large Key Accounts - Traditional Trade - HORECA - Online <p>Consumption Channels:</p> <ul style="list-style-type: none"> - Off-Premise (retail) - On-Premise (restaurants, bars) - Direct-to-Consumer (DTC) - Wine tourism experiences - Customer Feedback Mechanism
	Suppliers: Grape farmers, input/material suppliers, nurseries, logistics, machinery, and equipment vendors	Employees / Non-employees: Winemakers, viticulturists, agronomists, marketing & logistics staff	Clients / Consumers: Retailers, distributors, HORECA, tourists, direct consumers



SBM-2 – Interests and views of stakeholders

In this section we present how the interests and views of the stakeholders are taken into account Purcari's strategy and business model.

Purcari Wineries Group, as a leading wine producer in Eastern Europe, operates within a complex network of stakeholders that span across its value chain. From upstream suppliers to downstream consumers, each stakeholder plays a crucial role in shaping the company's strategy, sustainability commitments, and long-term value creation. Stakeholder engagement is central to our double materiality assessment and business model adaptation to sustainability risks and opportunities.

Table 3. Stakeholder Engagement

Element	Purcari Wineries' approach
i. Key stakeholders	Founders, Board of Directors, employees (senior and operational), shareholders, auditors, lenders, regulators, local communities, NGOs, farmers, distributors, consumers, suppliers, logistics partners, industry bodies, and others (full list in the table below)
ii. Whether engagement occurs	Yes, engagement occurs with most stakeholder categories, though the intensity and format varies.
iii. How it is organised	Engagement occurs through structured and informal channels: board meetings, investor calls, internal reviews, supplier meetings, quality audits, regulatory reporting, and wine tourism interactions.
iv. Purpose of engagement	<ul style="list-style-type: none"> - To inform strategic and operational decisions - To comply with legal and regulatory obligations - To foster trust and co-creation across the value chain - To identify material sustainability impacts, risks, and opportunities
v. How outcomes are considered	<ul style="list-style-type: none"> - Stakeholder insights inform our strategic planning, product development, ESG initiatives, and risk management - Results of internal and external engagement fed into our 2024 Double Materiality Assessment - Feedback loops from tourism, consumer surveys, distributor reports, and employee forums guide continuous improvement

The table below outlines the 21 groups of stakeholders identified, whether they are affected stakeholders, primary users of sustainability information, or both, and a mapping of their roles and interactions within the company's operations.

Table 4. Stakeholder Mapping

Stakeholder Group	Category (Affected stakeholders, User of Sustainability statement or Both)	Description of engagement approach
Founder & Board of Directors	Both	Business outcomes may influence board-level decisions, affecting company strategy and governance. Engagement through strategic oversight, quarterly meetings, and further – ESG integration into corporate governance.
Employees (Senior Management Level)	Both	Management's career progression is tied to business performance and decision-making effectiveness. Engagement through performance reviews, strategic input, cross-functional meetings.
Employees (Operational Level)	Affected stakeholder	Operational staff are impacted by workplace conditions, which affect job satisfaction and security. Engagement through workplace safety initiatives, HR programs, team feedback channels.
Shareholders	Both	Business outcomes may influence board-level decisions, affecting company strategy. Engagement through Annual General Meetings or Extraordinary General Meetings, financial disclosures, IR updates.
Auditors	Users of sustainability statements	Auditors validate company disclosures, influencing stakeholder trust and investment. Engagement through formal audits of financial and ESG disclosures (expected as of 2026).
Lenders and Creditors	Users of sustainability statements	Financial stakeholders use sustainability data to inform investment decisions, affecting capital availability. Engagement through ongoing dialogue on financial and ESG performance metrics (going forward).
Local Communities	Affected stakeholder	Community initiatives can build goodwill; environmental issues can cause local resistance. Engagement through community projects, rural employment, cultural preservation.
Public Authorities	Users of sustainability statements	Regulatory compliance can impose operational constraints but also drive improvements. Engagement through compliance reporting, licensing, environmental and labor inspections.
Wine Experts / Wine Stewards	Both	Expert endorsements can shape consumer preferences and affect sales. Engagement through product tastings, brand ambassador events, industry forums.
Consumers and Clients	Affected stakeholder	Consumer choices, such as responsible drinking, can enhance brand loyalty and profitability. Engagement through direct feedback via tourism, surveys, social media, and customer service.
Importers and Distributors	Affected stakeholder	Efficient distribution networks enhance market reach; logistical issues can impede business operations. Engagement through contractual reviews, joint planning, performance tracking.
Competitors	Users of sustainability statements	Competitive dynamics can influence market positioning and innovation. Engagement through market benchmarking, industry events, code of conduct participation.
Grape Farmers	Affected stakeholder	Sustainable farming practices improve wine quality, while unsustainable methods can harm the brand and

		supply. Engagement through long-term contracts, agronomic support, training on sustainable viticulture.
NGOs	Users of sustainability statements	NGO campaigns can affect public perception and pressure business practices. Engagement through direct dialogue on sustainability practices, community programs, environmental campaigns.
Industry bodies	Both	Advocacy, certifications, and trade development can open new markets and improve the business environment. Engagement through policy input, certifications, collective lobbying.
Suppliers	Affected stakeholder	Adoption of advanced technologies by suppliers can increase production efficiency and quality. Engagement through quality audits, onboarding processes, compliance with standards.
Logistics and Transportation Providers	Affected stakeholder	They are responsible for the efficient and safe delivery of wine products, with their performance affecting supply chain reliability and product quality. Engagement through coordination meetings, contract performance evaluation.
Local Media / Influencers	Both	Media coverage can significantly impact brand reputation and consumer perception. Engagement through press releases, brand storytelling, PR events.
Tourists	Affected stakeholder	Positive wine tourism experiences can foster brand loyalty and attract repeat visits. Engagement through feedback mechanisms at Chateau Purcari, direct interaction.
Academia	Users of sustainability statements	Educational institutions shape industry standards and supply skilled labor, influencing wine production practices. Engagement through collaboration on research, internships, knowledge-sharing events.

For the 2024 reporting year, Purcari Wineries conducted its first Double Materiality Assessment (DMA) in alignment with the European Sustainability Reporting Standards (ESRS). This assessment aimed to identify the material impacts, risks, and opportunities (IROs) relevant to the company's business model, operations, and value chain.

Given the novelty and complexity of the ESRS framework, Purcari relied primarily on internal expertise for this initial assessment. External stakeholder engagement was limited, as the technical nature of the IRO evaluation and the number of variables involved made it challenging to obtain meaningful input through surveys or direct consultation. Therefore, the Group leveraged the insights of internal stakeholders – senior managers, functional heads, and ESG coordinators – who maintain regular contact with external stakeholders. Their perspectives supported both the impact materiality and financial materiality assessments.

Recognizing the importance of broader engagement, Purcari plans to enhance its stakeholder involvement in future DMAs by:

- Designing tailored stakeholder surveys for external groups (e.g., consumers, distributors, local communities);
- Conducting focus groups or interviews to deepen qualitative insights;

As part of the Double Materiality Assessment (DMA) conducted in 2024, Purcari Wineries gathered insights primarily from internal stakeholders—senior leaders, coordinators, and department heads—who interact frequently with key external stakeholder groups, including

consumers, distributors, and local community representatives. These inputs reflected stakeholder expectations around sustainable agriculture, ethical business conduct, community development, and climate resilience.

While formal external engagement was limited in this first-year exercise, ongoing stakeholder feedback mechanisms, such as customer satisfaction reviews and investor meetings, continue to inform our strategic planning and ESG priorities. These insights support alignment between stakeholder interests and our evolving business model, which places increased focus on regenerative practices, premiumization, and long-term value creation.

At this stage, Purcari Wineries has not implemented direct amendments to its strategy or business model as a result of stakeholder input gathered during the 2024 DMA process. However, based on preliminary findings, we are considering a more structured stakeholder engagement plan and enhanced focus on climate risk management and biodiversity.

In the upcoming year, we plan to further evaluate the alignment between stakeholder expectations and our core strategy through targeted external consultations. This may inform updates to our long-term development roadmap and value chain engagement strategy.

The views and interests of stakeholders regarding sustainability-related impacts are communicated to the Executive Team and Board of Directors on an ad-hoc basis through internal updates, operational reviews, and investor relations briefings. While there is no formalised process in place yet for systematic communication of stakeholder concerns, we intend to enhance the frequency and structure of such updates as we develop our ESG governance framework in line with ESRS expectations.

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

Purcari's material impacts, risks and opportunities (IROs) and their interaction with the Group's strategy and business model are presented in detail in the following section.

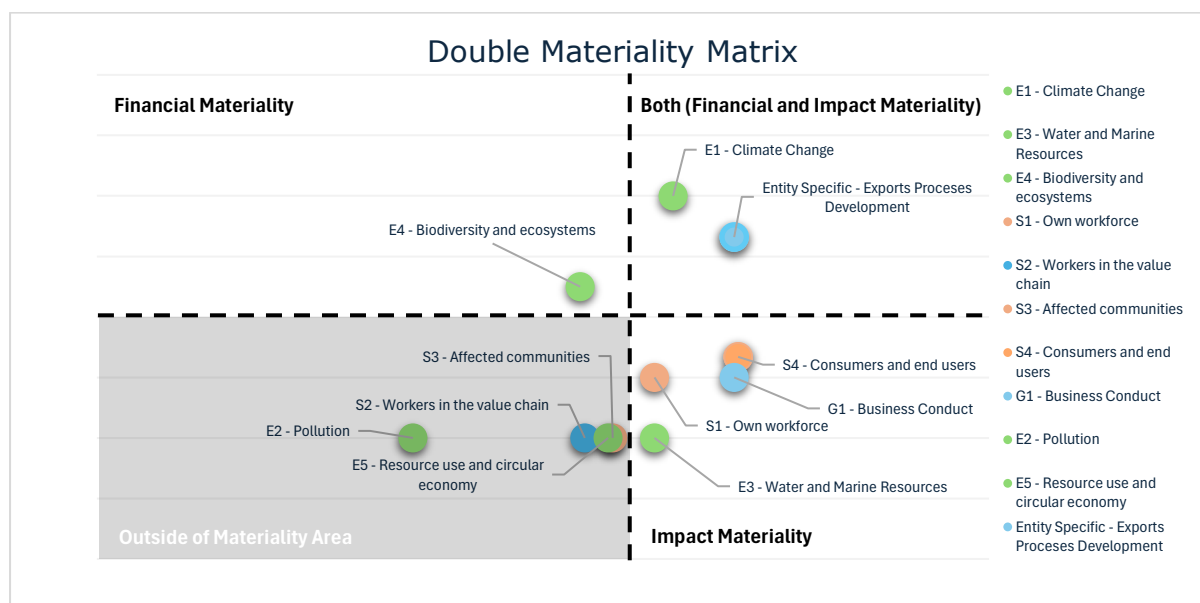


Figure 1. Double Materiality Matrix

Following the Double Materiality Assessment, the table below outlines the impacts, risks, and opportunities (IROs) identified as material to Purcari's operations. Each IRO includes the affected value chain area, time horizon, and its linkage to the business model.

Table 5. Material Impacts, Risks and Opportunities List

IRO Type	IRO label	IRO description	Business model impact
Climate Change Adaptation			
OPPORTUNITY	Qualitative and fertile soil	Before establishing a vineyard, comprehensive soil analysis is a mandatory step to ensure optimal conditions for vine growth. Purcari takes a rigorous approach, conducting annual assessments and planting targeted cover crops (e.g., grass seeding) to preserve and improve soil health.	<u>Own operations & Long-term</u> This proactive approach not only supports sustainable viticulture but also helps the vineyards adapt to changing climate conditions.
Climate Change Mitigation			
Actual positive IMPACT	Promoting climate change mitigation actions	By focusing on winemaking from sustainably managed vineyards and implementing eco-friendly practices, Purcari reduces its environmental footprint and contributes to broader climate mitigation effort, while attracting environmentally conscious consumers and boosting brand appeal, leading to stronger sale and customer loyalty.	<u>Own operations and downstream value chain & Medium-term</u> This approach also empowers consumers to make more sustainable purchasing choices, reinforcing brand loyalty and long-term competitiveness.
Water Consumption			
Actual negative IMPACT	Intensive Water Consumption in Viticulture	Viticulture is a water-intensive process, particularly in the arid regions of Moldova and Romania. Producing 1 liter of wine can require up to 450 liters of water. Excessive irrigation may strain local water resources, posing risks to ecosystems and the well-being of surrounding communities.	<u>Own operations & Long-term</u> The water footprint of vineyards varies depending on irrigation methods; however, implementing controlled irrigation helps mitigate negative effects by reducing runoff and water pollution, thereby promoting a more sustainable approach to water management.
Impacts on the extent and condition of ecosystems			
OPPORTUNITY	Habitat Conservation Activities	Active participation in local conservation projects helps protect and restore ecosystems, strengthens the winery's reputation, and contributes meaningfully to environmental sustainability.	<u>Own operations & Long-term</u> Engaging in habitat conservation activities strengthens our brand image and fosters positive, lasting relationships with local communities.
Secure Employment			
Actual positive IMPACT	Contributing to Local Economic Growth	Providing secure employment supports local economic growth and stability, as employees are	<u>Own operations & Long-term</u> By encouraging community investment and spending, enhancing employee retention,

		more likely to invest in and contribute to their communities.	and supporting interconnected industries (e.g., grape producers, packaging suppliers), Purcari strengthens both its business operations and the rural communities where it operates.
Access to (quality) information			
Actual positive IMPACT	Providing accurate information and labelling	Providing accurate and comprehensive information about wines—including origin, production methods, and tasting notes—enables consumers to make informed choices.	<u>Downstream value chain & Short-term</u> Accurate information about our wine products is essential to Purcari's business model—not only to ensure legal compliance but also to retain customer loyalty by leveraging the long-standing wine consumption traditions in our key markets.
Health and safety			
Actual positive IMPACT	Ensuring product safety and quality	Obtaining certifications and ensuring that suppliers adhere to food safety guidelines help safeguard against product safety risks.	<u>Downstream value chain & Short-term</u> This is a crucial aspect of our business, as it builds brand trust, provides consumers with unbiased assurance, and helps prevent risks of product recalls or withdrawals.
Security of a person			
Actual positive IMPACT	Promoting safe social environments for alcohol consumption	Promoting a responsible wine culture helps foster safe and controlled social environments.	<u>Downstream value chain & Long-term</u> Responsible wine consumption is part of the culture of our main countries of operation.
Responsible marketing practices			
Actual positive IMPACT	Promotion of responsible drinking	Promoting moderate consumption to support the health and safety of our consumers.	<u>Downstream value chain & Short-term</u> Raising awareness of health and safety risks is a key part of our business, helping to reduce alcohol abuse, educate consumers, and strengthen our ethical relationship with them.
Corporate Culture			
Actual positive IMPACT	Ethical Corporate Culture	An ethical and fair corporate culture based on fair practices and respect will have positive effects along the value chain from all ESG perspectives and will place the company in long-standing business relationships.	<u>Own operations & Long-term</u> Strong Ethical Corporate Culture is crucial for the sustainable development of the Group and improving reputation.

Actual positive IMPACT	Employee oriented corporate culture	An employee-oriented culture fosters a positive work environment, which directly contributes to improved business performance.	<u>Own operations & Short-term</u> Employees are vital to any company's success; their productivity and well-being are paramount. Reducing staff turnover and boosting motivation are essential to our business. This widely acknowledged—but often overlooked—principle highlights that without cultivating the right company culture, even the best processes and strategies will fall short.
Management of relationships with suppliers including payment practices			
Actual positive IMPACT	Fair and ethical suppliers' management	Fair treatment of suppliers and timely payments foster long-term business relationships built on mutual trust and responsibility.	<u>Upstream value chain & Short-term</u> Fairness and trust are essential for building strong partnerships, which underpin the long-term success and robust performance of our business.
Actual positive IMPACT	Traceability along the supply chain	Traceability throughout the supply chain ensures product quality and regulatory compliance, especially for premium wines. Efficient systems monitor every stage—from grape cultivation to distribution—enabling quick identification of irregularities, effective management of food safety risks, and adherence to sustainability standards.	<u>Upstream value chain & Short-term</u> Traceability along the supply chain is essential for ensuring safety, quality, reputation, and long-term business sustainability. These principles guide our entire production process. Moreover, traceability enhances transparency and builds consumer trust by clearly communicating product origin and quality.
Corruption and bribery: Prevention and detection including training			
Actual positive IMPACT	Preventing and detecting corruption and bribery system	We have implemented a robust system to prevent, detect, and investigate potential incidents, supported by a well-organized training program.	<u>Own operations & Short-term</u> We strive to uphold a high level of transparency by implementing a robust system for preventing, detecting, and investigating potential incidents, supported by a well-structured training program. This approach not only fulfils legal requirements but also underpins our long-term business sustainability.
Entity Specific - Exports Processes Development			
Actual positive IMPACT	Enhancement of Export Capabilities and Market Expansion	Developing export processes is essential for Purcari to expand its international market presence. By optimizing logistics, ensuring compliance with global trade regulations, and enhancing supply chain resilience, Purcari can more efficiently access new markets. This approach not only drives	<u>Own operations & Short-term</u> As the Purcari Group expands, we are committed to maintaining consistent standards of transparency in our commercial practices. With exports to over 40 countries, sustainably enhancing our export capabilities is essential

		company growth but also aligns with global governance standards by promoting transparency, ethical trade practices, and adherence to regulatory requirements across regions.	to support our strong export-oriented growth.
OPPORTUNITY	Exports Processes Development	Diversification is part of the Group's DNA, and our focus on external markets helps mitigate geopolitical risks. We produce in countries with lower cost bases while selling in markets with higher disposable incomes.	<u>Own operations & Medium-term</u> Purcari's diversified model reduces geopolitical exposure and creates opportunities to optimize export logistics, enhance compliance, and scale international growth.

Through the Double Materiality Assessment, one entity-specific sustainability matter was identified as material—Exports Processes Development. This matter is relevant due to its actual and potential positive impact on the Group's ability to expand its market presence internationally, while maintaining high standards of transparency and ethical trade. It is also material from a financial perspective, representing a strategic opportunity for growth and risk mitigation through diversification.

1.4. Impact, risk and opportunity management

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

In this section we present the information necessary to comprehend the process of identifying material impacts, risks, and opportunities, as well as the information included in the sustainability statement resulting from the materiality assessment.

Identifying the impacts, risks and opportunities, was a structured process based on a very comprehensive approach, which had business relevance at its core.

We started by generating a detailed Value Chain, which contains specific pillars for each stream: upstream, own operations and downstream. We worked closely with the activities mapped, to make sure each of these activities is mapped accordingly, this allowing us to identify possible impacts, risk or opportunity connected with each value chain mapped activity.

In addition, an analysis of mega- and macro-trends was conducted, to enable a better view of possible IROs within the industry that are relevant for our business. Within this process, we also evaluated the market by realizing a benchmark analysis, which was helpful in enlarging the understanding of impact, risks and opportunities within the viticultural sector.

Our identification methodology was based on stakeholder engagement through internal experts, validating and building on our results at every intermediary step described above.

To identify IROs, we utilized a combination of data sources, including both internal and external references. Internal data sources encompass reports and operational data, while external sources include stakeholder perspectives, industry standards and guidelines and academic research. Specifically, we refer to SASB Food and Beverage Standards, such as Agricultural Products Standards, Alcoholic Beverages Standard, Food Retailers and Distributors Standard, Non-Alcoholic Beverages Standard, Restaurants Standard, and Waste Management Standard. Additionally, we incorporate insights from the Annual Report on Driving Collective Actions to Decarbonize the Wine Sector, The State of Soil in Europe Report, the State of the Wine and Wine Sector from the OIV Press Conference on 25 April 2024, and the Report on Water Quality published by Nature Communications. The scope of operations covered includes upstream and downstream value chain activities as well as our own operations. In making our assumptions, we use detailed information from these sources to ensure a comprehensive assessment of potential financial impacts, thus providing a robust framework for understanding the associated risks and opportunities within Purcari's value chain.

Impact materiality refers to the inside-out perspective and reflects the potential impact Purcari's operations may have on environment and people. As mentioned above, the identification process was closely linked to our value chain mapping (also mapped in Table 4 above), considering both negative and positive impacts that our business might generate, basing our findings on standards, scientific studies and benchmarking in order to ensure no impacts are overlooked. The initial 'long list' of impacts was then refined by applying a systematic filtering and prioritization process to identify the most relevant impacts for further stakeholder evaluation. Using established criteria such as significance to the business model, potential for stakeholder influence, and alignment with regulatory frameworks like the CSRD and ESRS, we narrowed down the list to 78 impacts.

These selected impacts were deemed to hold the greatest relevance, either due to their substantial effect on the business or society or due to stakeholder interest. The refined list of

impacts was subsequently shared with key stakeholders for evaluation. Stakeholders were asked to assess the impacts. This stakeholder feedback had a crucial input into determining the final set of material topics for the organization's reporting process.

The prioritization of impacts was achieved through a systematic process that evaluates the relative severity and likelihood of negative impacts, and the relative scale, scope, and likelihood of positive impacts. This process determines which impacts are material for reporting purposes, including the qualitative or quantitative thresholds and other criteria.

To evaluate each impact, we developed a scoring system ranging from 1 (low relevance) to 5 (high relevance). This scoring system applies to topics derived from ESRS as well as Purcari-specific matters. The relevance and materiality of each impact to Purcari and its value chain were assessed using this scoring system:

- Scores of 1 or 2 indicate impacts of low relevance that are unlikely to result in material impacts.
- Scores of 3 to 5 are considered more significant and are retained for further analysis.

Based on the scoring system, material matters associated with impacts scored by stakeholder with 3 or higher were prioritized for further assessment on materiality by internal experts and Group decision-makers.

Financial Materiality represents the perspective given by the principle outside-in and it refers to the risks and opportunities that may occur in correlation with the nature of impacts identified in the previous step. Purcari has identified risks and opportunities based on a thorough analysis of its value chain, taking into account the connections between its impacts and dependencies. This comprehensive approach ensures that the potential risks and opportunities arising from these impacts and dependencies are fully understood and addressed.

The criteria used for assessing risks and opportunities were magnitude, which refers to the potential impact of the financial effect triggered by a risk or opportunity, and probability, defined as the likelihood of occurrence of a financial effect. The scoring system employed used the same scale as for the assessment of impacts, from 1 (low risk) to 5 (high risk).

When assessing the financial materiality, a two-phase process was applied. First, a group of experts assessed the entire set of relevant risks and opportunities. Then an amendment and validation was made by the company's Deputy Chief Executive Officer.

After the expert groups' assessment and CEO's final input and validation, the resulting material sustainability matters were established based on those associated risks and opportunities scored above the threshold for financial materiality.

The DMA, conducted in accordance with ESRS 1 and involving internal stakeholders and external input, provides a more structured basis for risk identification and prioritisation moving forward. This assessment will serve as a key input into developing a more formalised sustainability risk control framework.

Purcari is transitioning from reporting according to the Global Reporting Initiative (GRI) standards to the Corporate Sustainability Reporting Directive (CSRD), incorporating the Double Materiality Assessment (DMA) as outlined in the European Sustainability Reporting Standards (ESRS). This shift involves a more comprehensive and detailed materiality assessment process, considering both financial materiality and impact materiality. Compared to the prior reporting period, the process has been enhanced to align with CSRD requirements,

focusing on a broader range of sustainability matters and their impacts on our value chain. The materiality assessment process was last modified at the beginning of this reporting period to meet CSRD standards, and future revisions are scheduled annually to ensure continuous improvement and alignment with evolving regulatory requirements.

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

Purcari Wineries PCL has applied a systematic process to determine the materiality of information that aligns with the criteria outlined in ESRS 1 section 3.2. and the flowchart in Appendix E of ESRS 1.

Topic Materiality - We evaluated whether each topic covered by a topical standard is material. If a topic was deemed non-material, we omitted all related disclosure requirements. For topics identified as material, we assessed whether we have established relevant policies, taken actions, or set targets. If not, we disclosed this fact and, where applicable, provided an outlook for implementation.

Metrics Materiality - We then evaluated the materiality of the Disclosure Requirements (DRs) and individual Data Points (DPs) based on two criteria: significance for explaining the matter and relevance in decision-making for beneficiaries of the sustainability statement. If a DR was assessed as non-material, we did not disclose it. If the DR was material, we further assessed whether each DP was deemed material. If so, we disclosed the required information; if not, we omitted it.

Please refer to [Annex 1](#) for the list of DRs adhered to in the preparation of this sustainability statement, together with a table of all DPs derived from other EU legislation.

Chapter 2. Environment

2.1. Climate Change

Our commitments:

✓ Install additional solar panels (currently ~1 MWh installed) to increase sourcing of necessary power from renewable energy (aiming for up to 80%) and reduce dependency on grid.

Table 6. Climate change IROs overview

Climate Change Adaptation				
IRO Type	IRO label	Policies	Actions	Targets
OPPORTUNITY	Qualitative and fertile soil	<ul style="list-style-type: none"> Sustainable Viticulture Guidelines (not yet developed) Soil Management Protocols (site-specific, informal) 	<ul style="list-style-type: none"> Implement soil conservation practices (grass seeding, mulching) Expand the Vine & Soil Project to protect and enhance soil health and biodiversity. Use precision viticulture to monitor soil quality and adapt vineyard management accordingly. 	<ul style="list-style-type: none"> Achieve >50% cover cropping (grass seeding) on owned vineyards by 2030. Maintain or improve soil organic matter by minimum 0.5% per hectare annually. Expand precision viticulture to cover at least 70% of vineyards by 2027.
Climate Change Mitigation				
IRO Type	IRO label	Policies	Actions	Targets
Actual positive IMPACT	Promoting climate change mitigation actions	<ul style="list-style-type: none"> Energy Efficiency Protocols (informal, site-level) Renewable Energy Use Guidelines (under preparation) 	<ul style="list-style-type: none"> Implement renewable energy projects (solar panels at production sites). Reduce GHG emissions through energy efficiency upgrades in production and storage. Develop carbon footprint measurement for direct operations (under preparation) 	<ul style="list-style-type: none"> Achieve 80% renewable energy use in winery operations at Group level by 2030. Maintain 25 hectares under Native Project - Bio by 2025.

E1-1 - Transition plan for climate change mitigation

As the agricultural sector faces the pressing challenges posed by climate change, the development of comprehensive transition plans has emerged as a critical practice. The wine industry, in particular, is highly susceptible to the impacts of a changing climate, characterized by rising temperatures and increasingly unpredictable weather patterns across Europe. These shifts not only threaten the delicate balance of terroir but also necessitate proactive measures to ensure sustainability and resilience. In light of these challenges, at Purcari Wineries Group, we recognize the urgency of addressing climate change and its potential impacts on our

business. However, the company has not yet adopted a formal climate transition plan and currently does not align its strategy with the Paris Agreement's global warming target.

In the absence of a formal plan, our transition efforts rely on existing best practices, which include:

Soil Analysis and Cover Crops Planting: Before planting the vineyard, soil analysis is a mandatory process, ensuring the best possible conditions for vine growth. Purcari is meticulous in this process, conducting annual evaluations and planting specific cover crops (especially grass seeding) to maintain and enhance soil health. This proactive approach not only supports sustainable viticulture but also helps the vineyards adapt to changing climate conditions.

Sustainable Viticulture and Reduction of Environmental Footprint: Purcari wines are produced from vineyards where we apply traditional viticulture methods, including manual vineyard care and time-honored vinification techniques. As part of our commitment to sustainability, 25 hectares of the Group's vineyards are already certified as organic (Bio), marking an important step forward. While we are not yet fully sustainable across all our vineyards, we continue to implement eco-friendly practices aimed at reducing greenhouse gas emissions and supporting climate change mitigation efforts.

While a formal transition plan is not yet in place, Purcari Wineries Group is committed to further developing a comprehensive strategy to manage climate-related risks and opportunities. This includes plans to engage with internal stakeholders — including our administrative, management, and supervisory bodies — to integrate climate considerations into our broader business strategy. External stakeholder consultation and climate scenario analysis will also be considered as part of this process.

To support these efforts, we are committing significant financial resources. Our operational expenditures (OpEx) were 2024 are set at RON 11.95 million (amount), while our capital expenditures (CapEx) were set at RON 56.78 million (amount). We are also aware of the risk posed by locked-in GHG emissions from key assets and products, which could hinder our progress.

Our approach ensures that climate factors are increasingly considered in decision-making processes as we prepare to develop a formal transition plan. We will keep our stakeholders informed about progress and next steps on this important sustainability journey.

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

Climate risk assessment

Purcari Wineries Group has undertaken its first risk assessment with a focus on analyzing exposure to climate risks, marking a significant step in determining its vulnerability to these challenges. By systematically identifying and analyzing these risks, Purcari has laid the groundwork for understanding the specific vulnerabilities within its operations.

This proactive approach to risk assessment is crucial for enhancing the business resilience of Purcari Wineries Group in the face of climate change. By gaining insights into their exposure to climate risks, the group can prioritize areas that require immediate attention and develop targeted adaptation strategies to mitigate potential impacts. This not only helps in safeguarding their production but also ensures the sustainability of their operations in the long term.

Furthermore, the initial steps taken in assessing vulnerability to climate risks enables the further development of adaptation measures. Existing adaptation measures are elaborated in Chapter 2 – Environment, including research and development actions aimed at improving practices and technologies to better withstand climate challenges.

By integrating these adaptation measures into their strategic planning, Purcari Wineries Group is enhancing its business resilience to climate change and ensures a comprehensive approach to be well-prepared to navigate the uncertainties posed by climate change, ultimately contributing to its long-term success and sustainability.

The climate risk assessment included the assets of the following vineyards:

- Moldova: Purcari, Bostavan, Bardar
- Bulgaria: Angel's Estate
- Romania: Ceptura, Vinoteca Gherasim-Constantinescu

Relevant physical risks were identified based on the extensive list outlined in Appendix A of the EU Taxonomy Regulation, which details generic criteria for "Do No Significant Harm" (DNSH) to climate change adaptation.

Each applicable risk was evaluated using the progression of specific climate change indicators. The transitional risks were determined by extensive research and the quantitative analysis of the impacts of certain transition risks was carried out using NGFS scenarios for financial valuation.

For the evaluation of climate indicators and costs modelling, the following climate scenarios were used:

- SSP1-RCP2.6; Net Zero 2025
- SSP2-RCP4.5; Nationally Determined Contributions (NDC)
- SSP5-RCP8.5 – high emissions, Current policies, Fragmented World

Following the climate risk assessment, we have determined 12 relevant physical climate risks, as follows:

- Acute climate risks with higher exposure: Draught, Heatwaves, Wildfire
- Acute climate risk with lower exposure: Cold waves, Storm, Flooding
- Chronic climate risks with higher exposure: Heat stress, Changing temperatures, Water stress
- Chronic climate risks with lower exposure: Changing wind patterns, Changing precipitation patterns

Physical climate risks, especially those related to water and temperature, significantly impact vineyards, primarily through moisture deficiency. Insufficient water can hinder grapevine growth, leading to reduced vigour, smaller leaves, and ultimately lower grape yields due to fewer or smaller clusters. While moderate moisture deficiency can enhance grape quality by concentrating flavours, excessive drought negatively affects fruit quality, causing imbalances in sugar, acidity, and phenolic compounds essential for wine production.

Unsuitable climate conditions can also delay ripening, misaligning harvest timing with optimal weather, and increase the vulnerability of vines to pests and diseases. Prolonged drought may lead to soil degradation, affecting vineyard health and necessitating more intensive irrigation practices, which increase costs and complicate water resource management.

Research initiatives are crucial to understanding how different grapevine varieties respond to drought, aiding in maintaining high-quality production and developing innovative techniques for improved water use efficiency. The Group has launched several projects to investigate vine variety characteristics and responses, aiming to enhance sustainability and grape quality, thus ensuring the long-term viability of vineyards amid changing environmental conditions and reducing vulnerability to climate risks.

Following the climate risk assessment, 4 major categories of transition risks were identified:

- Policy, Regulatory, and Legal Risks
- Technological Risks
- Market Risks
- Reputational Risks

Among the most important policy and regulatory risks, the emerging focus areas of the EU are the most relevant for the Purcari Wineries Group. Key focus areas include climate adaptation, with increased financial support for climate-related interventions such as new agronomic techniques and efficient irrigation systems. The EU encourages sustainable viticulture by promoting environmentally friendly farming methods, allowing organic winemakers to produce dealcoholized wine without losing their certification. Additionally, member states will have greater flexibility regarding vineyard management, including extended replanting authorizations.

Digital labelling initiatives aim to reduce costs for producers by promoting digital ingredient and nutritional information. The EU also seeks to clarify and enhance quality policies related to wines with geographical indications, including Protected Designation of Origin (PDO) and Protected Geographical Indication (PGI) wines. A significant focus is placed on biodiversity, with regulations emphasizing sustainable practices that enhance vineyard ecosystems through methods like cover cropping and natural pest control.

However, adhering to EU sustainability goals may incur notable costs for Purcari, including consultancy fees and resource allocation for compliance with various regulations. Restrictions on water use during droughts can lead to decreased productivity and quality, impacting the Group's financial viability. Furthermore, minimum emission standards for agricultural machinery may necessitate costly investments in eco-friendly equipment, while pesticide and fertilizer regulations could result in yield losses.

Lastly, the EU's efforts to reduce wine oversupply may require Purcari to remove unprofitable vineyard areas or leave grapes unharvested, complicating vineyard management and potentially leading to further yield losses. Overall, these emerging EU focus areas present both challenges and opportunities for the wine industry.

The reputation risks that were identified refer to negative public perception and backlash against companies that do not meet sustainability expectations. Consumer preferences for sustainable organic wine are rising due to increased awareness of environmental issues and a desire for healthier lifestyles. Many seek wines produced without synthetic pesticides and fertilizers, valuing ethical production and transparency. This trend is especially strong among younger generations who prioritize health and sustainability. Additionally, interest in dealcoholized wines is growing, particularly among Millennials and Gen Z, who favor mindful drinking. These shifts may impact Purcari Wineries Group's revenues as customers gravitate towards eco-friendly competitors. Investors are also favoring businesses with strong sustainability commitments, making it crucial for Purcari to enhance its sustainability framework.

The main technological risks identified refer to the need to upgrade operational technologies, which implies additional costs. The need for investments in green technologies is critical for wine producers to mitigate these risks. By adopting sustainable practices, such as renewable energy sources, water conservation technologies, and organic farming methods, companies can not only enhance their resilience against potential asset stranding but also align with consumer preferences for sustainable products. Financially, the failure to invest in green technologies can lead to increased operational costs, loss of market share, and potential write-downs of assets that become obsolete or less desirable.

The wine market as whole is being influenced by climate change impacts, both physical and transitional. Climate change is creating new geographic areas suitable for wine production, allowing regions like the United Kingdom and Scandinavia to become viable for vine cultivation. However, climate instability complicates production planning, leading to alternating good and bad agricultural years, which can result in oversupply and price reductions that impact profit margins.

At the same time, energy price volatility poses a significant transitional climate risk, as regulations aimed at climate mitigation may increase energy costs. This instability can lead to operational cost fluctuations for Purcari Wineries Group, reducing profitability and complicating long-term financial planning. Following our analysis of energy costs evolution, we have found that the largest increase for yearly energy costs is expected to take place in Moldova, an corresponds to the acquired electricity: 29% in 2040 compared to 2024 values, as resulted from Net Zero 2050 scenario.

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

Purcari Wineries Group has not yet adopted formal written policies specifically dedicated to climate change mitigation or adaptation, nor has it developed a climate transition plan aligned with the objectives of the Paris Agreement. However, initial steps have been taken to incorporate climate-related objectives into our broader Sustainability Charter, structured around six key pillars. Climate change mitigation is addressed under the pillar “Protecting and preserving our heritage: Achieving our climate transition.”

Climate Change Adaptation

In the absence of a formal adaptation policy, the Group implements a series of practices aimed at improving climate resilience, particularly in vineyard management and soil health. These include:

- **Soil and vineyard monitoring:** Agricultural and production teams at each winery establish internal quality thresholds and performance indicators to monitor vineyard and soil health. Although not formalized at Group level, these practices rely on local expertise and terroir-specific knowledge, essential to preserving grape quality and wine character.
- **Sustainable ground cover:** Grass is planted between vine rows, helping prevent erosion, regulate soil temperature, retain water, and control dust and weeds. This practice contributes to a more stable and resilient vineyard ecosystem.
- **Organic conversion and biodiversity:** Through the Native Project, Purcari is producing wine from grapes sourced from vineyards under conversion to organic farming (currently 25 ha). Additionally, across all Purcari vineyards pruned vine shoots are reintegrated into the soil to enhance humus levels, support fertility, and regenerate vineyard biodiversity.

Although the Group does not currently use cover crops in the agronomic sense, the planting of grass between rows serves a similar function within our sustainable viticulture model. This technique contributes to improved soil health by preventing erosion, enhancing water retention, regulating soil temperature, and minimizing dust and weed growth – fostering a more balanced and resilient vineyard ecosystem. This practice was first introduced through Purcari's *Native Project*, which produces a wine from grapes in conversion to BIO agriculture (CAB) and is currently being gradually implemented on the rest of Purcari's vineyards.

All Group vineyards are located in regions with Protected Geographical Indications (PGI) or Controlled Designations of Origin (DOC), requiring adherence to national and EU viticultural standards. These legal frameworks provide a baseline for sustainable agricultural practices, although they do not substitute a formal Group-wide adaptation strategy.

In the Republic of Moldova, the wineries must comply with the Specifications for the production of wines with geographical indication, as outlined in Article 34 of Law no. 66-XVI of March 27, 2008, and the Law on Vine and Wine No. 57-XVI of March 10, 2006. The specifications can be found here:

- [Technical Regulation for Ștefan Vodă PGI](#)
- [Technical Regulation for Codru PGI](#)

In Romania, the wineries must comply with the product specifications of each Controlled Designation of Origin (DOC). For instance, Crama Ceptura, located in the Dealu Mare DOC, adheres to the following specifications:

- [Dealu Mare DOC Specifications](#)

In Bulgaria, the regulation of wines with PGI is governed by national legislation in accordance with EU regulations, requiring Angel's Estate to comply with:

- [Bulgarian PGI Regulations](#)

The implementation of these specifications is managed by each winery's agricultural and certifications teams, overseen by the Group's main (agricultural and certifications) departments, which set the tone for the best practices. Ultimately, these departments are supervised by Mr. Victor Bostan (Founder). Each winery's certifications team reports to the relevant commissions overseeing the regions where the Group has vineyards.

Climate Change Mitigation

While the Group has not yet adopted standalone policies dedicated to climate change mitigation, a series of concrete actions have been implemented:

- **Photovoltaic energy systems:** Purcari Winery, Bostavan Winery and Bardar Distillery have installed solar panels, reducing reliance on conventional energy and contributing to GHG emission reductions.
- **Low-impact winemaking technologies:** The Group utilizes Mythos and Ganimede fermentation tanks in its production processes, which capture CO₂ generated during fermentation and reuse it for wine aeration. This closed-loop process helps reduce emissions and enhances product quality.
- **Sustainable viticulture practices:** Traditional vineyard care, including manual labor and time-honored techniques, is applied across operations. Currently, 25 hectares of vineyards are certified organic (Bio), marking early progress toward a

more sustainable model, used for the production of the Native Project. While the Group is not yet fully sustainable across all vineyard areas, its commitment to sustainable agriculture continues to expand.

Climate-related efforts and several sustainability-focused are led by our R&D and Agricultural Departments, that apply best practices that align with traditional PGI standards and region-specific regulations, with oversight from the Group's Executive Team. As part of our governance approach, regular reviews are conducted to assess progress, adapt approaches, and identify opportunities for innovations.

Our current climate adaptation practices aim to strengthen resilience across our operations and supply chain by identifying potential risks and implementing practical responses, particularly in viticulture and infrastructure management. Although a formal adaptation policy has not yet been adopted, we continue to invest in infrastructure and technologies – such as photovoltaic systems and sustainable vineyard techniques – that enhance our ability to cope with climate-related challenges.

Stakeholder engagement plays a key role in shaping our approach. Through collaboration with internal teams, local communities, certification bodies, and regional commissions, we gather insights that help guide our sustainability efforts. These engagements – whether through consultations, audits, or shared best practices – enable us to align our activities with local expectations and regulatory standards.

While climate-related policies are still being developed, the integration of mitigation and adaptation considerations into our Sustainability Charter ensures that we are building a practical and forward-looking framework. As we advance, we will regularly review our actions to ensure relevance and effectiveness, and we will continue exploring opportunities for innovation and improvement in our sustainability practices.

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

Purcari Wineries Group continues to implement targeted actions and allocate resources to support climate change mitigation and adaptation, even in the absence of formal standalone policies. Our initiatives are embedded within our broader sustainability objectives and are guided by practical, measurable practices across viticulture, winemaking and energy efficiency.

Sustainable Viticulture Practices and Soil Health

To ensure sustainable management of our vineyards, Purcari Wineries conducts regular soil analyses as part of a proactive approach to maintain soil health, optimize nutrient input, and reduce dependence on synthetic fertilizers. Soil assessment follows best practices and national agricultural norms. Our vineyards operate under Protected Geographical Indications (PGI) and Controlled Designation of Origin (PDO) classifications, which require strict adherence to a set of rules and standards audited annually by relevant national authorities:

- In the Republic of Moldova, oversight is provided by the National Office of Vine and Wine (ONVV), which monitors compliance with viticulture and winemaking standards.
- In Romania, the National Office of Vine and Wine Products (ONVPV) authorizes vineyards and grants wine certifications.
- In Bulgaria, compliance is overseen by the Ministry of Agriculture, Food and Forestry, along with the Executive Agency for Vine and Wine, in accordance with EU legislation.

Respecting these standards is essential – not only for regulatory compliance but also to preserve the heritage and authenticity of our wines, support the marketability of PGI/PDO – labelled products, and enhance consumer trust. Failure to comply can result in fines, confiscation of products, and loss of certification. From a marketing perspective, PGI and PDO labels also serve as quality seals, contributing to consumer's willingness to pay a premium for our wines. These standards help preserve regional wine traditions and local grape varieties, contributing to the long-term value of the appellation.

Before planting new vineyards, we conduct comprehensive field assessments that include soil sampling across 13 key parameters (e.g., nitrogen, phosphorus, potassium, etc.). Based on these results, we apply fertilizers to optimize nutrient levels for vine growth.

In 2024, our R&D team launched the Vine & Soil Project, aimed at high-resolution, non-destructive soil mapping (ARP technology) to evaluate agronomic and oenological potential at parcel scale. This modern technology enhances our soil management practices, as we use electromagnetic wave scanning devices to reveal the soil's structure and identify variations in soil composition. As a result, we create soil cartography maps to guide optimal vineyard layout and enhance terroir expression in the final wines.

By May 2025, approximately one-third of our vineyards will include grass planted between the rows. This practice not only protects and enhances soil health but also combats erosion, regulates soil temperature, reduces CO₂ emissions – enhancing soil organic carbon sequestration capacity, suppresses weeds, and contributes to overall biodiversity. This initiative appeared as an effort to mitigate climate change through sustainable viticulture practices

One notable project among our sustainable initiatives is the Native project, which focuses on producing wine from grapes grown in a 25-hectare parcel that is currently in transition to organic farming. The project employs environmentally friendly agricultural techniques that promote biodiversity and soil fertility. The vineyard, located on the hills near the Black Sea, benefits from a unique combination of cold loamy soil, contributing to the production of balanced and elegant wines.

To further reduce our carbon footprint, we have implemented cover cropping, specifically grass seeding, to normalize soil temperature in our vineyards. Bare soil can heat up significantly, adversely affecting vine health. By maintaining grass cover, we enhance soil moisture, ease fieldwork, and return nutrients to the soil through the decomposition of cut grass and pruned vines. Research indicates that grass seeding can amplify soil organic carbon sequestration potential by up to four times compared to conventional tillage practices.

We also utilize advanced fermentation technology with our Mythos and Ganimede fermenters. These systems capture and reuse CO₂ generated during fermentation, eliminating the need for external pumps and enhancing energy efficiency. This process not only reduces emissions but also improves the quality of our wines by minimizing oxidation and ensuring optimal extraction of flavors.

In 2022, we launched a project to install photovoltaic systems across our facilities. At Purcari Winery, we installed a solar panel system that includes 448 Longi monocrystalline panels, generating an average daily output of 1,200 kWh. By 2024, our photovoltaic systems generated approximately 498,000 kWh, resulting in energy cost savings of over 1.4 million MDL, covering about 40% of the winery's total energy consumption. Similar systems have been installed at Bostavan Winery and Bardar, contributing to significant energy savings and furthering our commitment to sustainability.

Although Purcari Wineries has not yet implemented a formal climate adaptation policy, several adaptation measures are already in practice at the operational level. These include:

- **Nature-based solutions:**

- Grass cover between vineyard rows to reduce erosion, retain soil moisture, and regulate temperature.
- Reintegration of pruned vine shoots into the soil to support fertility and carbon sequestration.
- Organic conversion practices aimed at improving biodiversity and long-term vineyard resilience.
- Technological solutions:
- High-resolution soil mapping and cartography using electromagnetic scanning to better understand soil structure and adapt vine planting strategies accordingly.

- **Behavioural/ management-based solutions:**

- Site-specific vineyard management based on local expertise and annual soil analyses.
- Adjustments in vineyard planning and care to account for shifting climatic conditions (e.g. changes in planting density or timing of field operations).

The Group plans to build upon these practices as part of a broader, formalized climate adaptation strategy in the future.

The implementation of climate-related actions at Purcari Wineries Group is partially dependent on the availability and strategic allocation of financial and human resources. While many of our ongoing initiatives – such as sustainable soil management, organic conversion, and renewable energy installations – have been integrated into operational budgets, the scale-up of such actions remains sensitive to investment capacity and cost-benefit considerations.

Decisions regarding CapEx and OpEx allocation are made following annual financial reviews, prioritizing projects and long-term sustainability benefits and alignment with our climate objectives. Availability of technical expertise and evolving regulatory requirements also influence the pace and scope of implementation, particularly in areas such as emissions monitoring, advanced irrigation, and vineyard resilience measures.

Although resource constraints may impact the timeline of certain initiatives, sustainability considerations are increasingly embedded into strategic planning to ensure continuity and scalability of climate-related actions across the Group.

The following table provides an overview of our climate change mitigation and adaptation actions, along with the resources allocated for their implementation:

Table 7. Decarbonization levers

Decarboni- zation Lever	Specific Action		Time- horizon	GHG Emissions Reductions		Referenc e to
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		Status (planned or implemented)		Expected	Achieved	Capex and/or Opex	financial statement
Renewable energy	Installation of photovoltaic systems at Purcari, Bostavan, and Bardar wineries	Implemented	2022– 2024	Estimated annual savings: ~400–500 tCO ₂ e	To be measured in 2025 Sustainabi lity Report	> EUR 1 million invested to date	Capex disclosed in Annual Report 2024

Notes:

- Expected GHG savings are indicative, based on average renewable output and national grid emission factors.
- Capex is reflected in “Property, Plant & Equipment” additions in the 2024 Consolidated Financial Statements.

At this stage, the Group has not yet established a formal methodology, digital system, or dedicated structure for maintaining verified evidence on GHG emission reductions, related CapEx or OpEx, or the CapEx plan in a systematic manner. A more robust approach, including strengthened data management processes and detailed disclosures aligned with ESRS and EU Taxonomy requirements, is planned for the 2025 reporting cycle.

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

At present, Purcari Wineries Group has not yet formally established measurable, outcome oriented GHG emission reduction targets compatible with limiting global warming to 1.5°C, nor has it defined an official baseline year or target year. However, the Group acknowledges the importance of setting such targets and is actively implementing decarbonisation actions — such as renewable energy installations, soil carbon projects, and low-impact viticulture initiatives — which contribute to climate change mitigation and adaptation.

We have been actively implementing measures that contribute to both climate change adaptation and mitigation. These initiatives, while undertaken outside a formal framework such as a transition or adaptation plan, are integrable into our future strategy and will form the basis of our climate approach. Our projects to date are not explicitly aligned with the Paris Agreement and do not have the sole purpose of achieving climate targets, however they lay the groundwork for a more structured climate approach. Looking ahead, we intend to develop a comprehensive plan that integrates relevant environmental, social, technological, market, and policy considerations, identifies appropriate decarbonization levers, and defines measurable climate-related targets. The strategy will be guided by scenario analyses and tailored to the specific context and capacities of our operations.

One of our key initiatives is the Vine & Soil project, which leverages high-resolution, non-destructive soil mapping through Automatic Resistivity Profiling (ARP) technology. The project aims to define and manage the agronomic and oenological potential of our vineyards at the parcel level. Key objectives include acquiring geophysical data for approximately 300 hectares of vineyards in partnership with Geocarta, developing tailored sampling plans based on vineyard variability, and collecting soil samples for physico-chemical and microbiological analysis.

The thematic maps generated from this project support data-driven decision-making in irrigation, fertilization, phytosanitary protection, yield optimization, and risk mapping for frost, disease, and CO₂ sequestration potential.

The project commenced in 2024, with the initial scanning phase covering around 12% of Château Purcari's vineyards, completed by July 2024. To date, soil scanning has been finalized for vineyard plots located at Purcari, Chetrosu, Etulia, Timbrus, Onești, and Les Terres Noires (bio), the latter associated with the Native Project. Scanning of the Angel's Estate vineyards is expected to be completed by the end of June 2025.

The Group is already able to monitor and interpret critical data, including organic matter content, water retention capacity, pH levels, and soil composition (e.g., clay vs. sand). These insights enable parcel-specific viticultural decisions, improving both wine quality and climate resilience.

Purcari's vineyards are situated on carbonate chernozem soils, recognized for their fertility, structure, and high calcium content—ideal conditions for vine growth. The plateau areas feature deep, homogeneous soils with greater root accessibility, carbon storage potential, and higher water reserves, supporting high yield potential. In contrast, the hillside/sloped areas display greater variability due to erosion processes, offering qualitative potential, but with lower organic matter, reduced water availability, and shallow Miocene-era limestone bedrock (dating back 5–25 million years).

Several maps are still under development by the Geocarta team in collaboration with project partners. The ultimate goal is to improve the FAO biodiversity indicator to 4‰ (promiles)—a benchmark adopted by Moldovan wine producers. Purcari is expected to pioneer the achievement of at least 3‰ in biodiversity by 2030. Project partners include the Institute of Pedology, Agrochemistry and Soil Protection 'Nicolae Dîmo' (Moldova), Faculty of agricultural, forestry and environmental sciences, Technical University of Moldova, The Faculty of Biology and Geoscience, State University of Moldova, IP Scientific-Practical Institute of Horticulture and Technologies (Moldova), and Geocarta (France). Soil analyses conducted or planned for newly acquired vineyard parcels (2024-2025) will remain confidential and are excluded from public disclosure at this time.

In addition to the Vine & Soil project, we adhere to the stringent norms set by Protected Geographical Indications (PGI) for grape cultivation. These standards dictate various practices, including plantation density, varietal purity, and soil fertilization methods, all of which contribute to the long-term sustainability of our vineyards against the changing climate conditions. For Ștefan Vodă, plantation density ranges from 1,904 to 3,200 vines per hectare, with gaps in vineyard plantations not exceeding 15%. Varietal purity is maintained at 100%, and soil fertilization is performed by applying organic fertilizers once every 5-6 years, alongside chemical fertilizers in recommended doses. For Codru, plantation density is a minimum of 2,500 vines per hectare, with similar standards for varietal purity and soil fertilization. For Dealu Mare, varietal purity must be at least 85%, with impurity vines belonging exclusively to *Vitis vinifera* species. Planting density is a minimum of 3,000 vines per hectare, and irrigation is allowed only in drought years.

Our commitment to climate change mitigation is further exemplified by the Native Project, which focuses on converting a 25-hectare vineyard to organic-certified viticulture. This project aligns with the EU Green Deal and promotes sustainable farming practices that benefit biodiversity and soil health. The conversion process, which began in 2021, is expected to achieve certification milestones leading to organic status before 2024. The project supports Purcari's sustainability and innovation strategy, with environmental benefits including reduced

use of synthetic agrochemicals and enhanced biodiversity. Metrics used to evaluate performance and effectiveness include hectares under organic conversion and certified as Bio (25 ha), wine quality and characteristics (balance, aroma, elegance), reduction in use of synthetic agrochemicals, and contribution to sustainability strategy and CO₂ reduction goals. The conversion to organic farming involves a 3-year transition period, with eco-friendly agrotechniques assumed to improve biodiversity and soil fertility. Expertise from Dr. Gheorghe Arpentin is considered a factor in performance, with soil and climate factors (cold loamy soil and proximity to the Black Sea) assumed to influence quality. Validation is provided by an organic certification body confirming Bio status.

To enhance our carbon sequestration efforts, we have implemented grass seeding in our vineyards. This practice not only reduces soil temperature and enhances soil humus but also significantly improves carbon sequestration potential. Research indicates that vineyards employing permanent cover crops can reduce CO₂ emissions substantially compared to conventional tillage practices. Metrics used to evaluate performance include soil temperature regulation, moisture retention, and humus content increase, alongside enhanced carbon sequestration and improved soil workability. Grass seeding reduces soil temperature (+10°C when bare), with organic matter decomposition from pruned vines and grass. Statistical backing from Novara et al. (2020) shows that vineyards with cover crops emit only 0.64 t CO₂/ha/year versus 2.31 under conventional tillage. Validation is provided by academic/scientific studies.

Moreover, we have adopted advanced fermentation technology with our Mythos and Ganimede fermenters, which capture and reuse CO₂ generated during fermentation. This innovative approach reduces our carbon footprint and enhances energy efficiency, contributing to our overall sustainability goals. Metrics used to evaluate performance include reduction of carbon footprint during fermentation, increased energy efficiency and safety, and enhanced wine quality (structure, aroma). CO₂ pressure is used for mixing and délestage, eliminating electric pumps, with reuse of internally generated CO₂ gases. Assumptions include reduced oxidation due to the enclosed, automated system. Validation is provided by equipment manufacturers/technical specifications.

Lastly, our investment in photovoltaic systems across our wineries supports our transition to renewable energy. Since 2022, we have installed solar panels at Purcari, Bostavan, and Bardar wineries, significantly reducing our reliance on grid electricity. By 2024, our photovoltaic systems generated approximately 498,000 kWh at Purcari alone, covering about 40% of the winery's energy needs and resulting in substantial cost savings. Metrics used to evaluate performance include annual kWh generated per winery (e.g., 498,000 kWh at Purcari in 2024), percentage of energy consumption covered (e.g., 40% at Purcari), and MDL saved (e.g., 1.4 million MDL in 2024 at Purcari). Systems consist of Longi panels and SMA Sunny inverters, with capacity, area, and daily/monthly output recorded. Assumptions are based on actual energy bills and inverter tracking systems, with installation companies and technology providers validating the performance.

E1-5 – Energy consumption and mix

The following tables provide information on our energy consumption and production metrics for 2023 and 2024.

Table 8. Energy consumption

Energy consumption and mix	2024
(1) Fuel consumption from coal and coal products (MWh)	n/a
(2) Fuel consumption from crude oil and petroleum products (MWh)	7,870.08
(3) Fuel consumption from natural gas (MWh)	134,981.53
(4) Fuel consumption from other fossil sources (MWh)	n/a
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	3,988.06
(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	146,837.46
Share of fossil sources in total energy consumption (%)	98.96
(7) Consumption from nuclear sources (MWh)	386.70
Share of consumption from nuclear sources in total energy consumption (%)	0.25
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	n/a
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	1,177.68
(10) The consumption of self-generated non-fuel renewable energy (MWh)	n/a
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	1,177.68
Share of renewable sources in total energy consumption (%)	0.79
Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)	148,386.05

Table 9. Energy production

Energy production	2024
Total energy production from renewable sources (MWh)	864.21
Total energy production from non-renewable sources (MWh)	0

Table 10. Energy intensity per net revenue

Energy intensity per net revenue	2024
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/millions lei)	387.94

To provide a complete picture, we reconcile our energy consumption data with relevant line items in our financial statements, including:

- Net Revenue from Activities in High Climate Impact Sectors: 382.50 million lei
- Net Revenue from Activities Other than in High Climate Impact Sectors: n/a

This approach to tracking energy consumption and production not only supports our climate change mitigation efforts but also informs our strategic decisions moving forward. By continuously monitoring these metrics, we can identify opportunities for improvement and align our operations with our sustainability objectives.

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

Table 11. Gross Scopes 1, 2, 3 and Total GHG emissions

Gross Scopes 1, 2, 3 and Total GHG emissions	2024
Scope 1 GHG emissions	
Gross Scope 1 GHG emissions (tCO ₂ eq)	31,347.61
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	n/a
Scope 2 GHG emissions	
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	2,844.67
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	2,835.14
Significant Scope 3 GHG emissions	
Total Gross indirect (Scope 3) GHG emissions (tCO ₂ eq)	19,878.90
1 Purchased goods and services	11,036.46
2 Capital goods	2,216.92
3 Fuel and energy-related Activities (not included in Scope 1 or Scope 2)	5,384.74
4 Upstream transportation and distribution	104.26
5 Waste generated in operations	59.37
6 Business traveling	53.64
7 Employee commuting	n/a
8 Upstream leased assets	n/a
9 Downstream transportations	130.28
10 Processing of sold products	n/a
11 Use of sold products	n/a
12 End-of-life treatment of sold products	893.22
13 Downstream leased assets	n/a
14 Franchises	n/a
15 Investments	n/a

Total GHG emissions	
Total GHG emissions (location-based) (tCO ₂ eq)	53,902.33
Total GHG emissions (market-based) (tCO ₂ eq)	53,892.79

Table 12. GHG intensity per net revenue

GHG intensity per net revenue	2024
Total GHG emissions (location-based) per net revenue (tCO ₂ eq/mil. RON)	140.93
Total GHG emissions (market-based) per net revenue (tCO ₂ eq/mil. RON)	140.92

GHG emissions are tracked and disclosed across all scopes to provide a comprehensive understanding of our environmental impact, including gross emissions from Scopes 1, 2, and 3, which are essential for evaluating our performance in relation to climate change mitigation. Our total GHG emissions are categorized as follows:

Our disaggregated emissions for 2024 are detailed by country and source type, allowing for a detailed analysis of our emissions profile.

Scope	Companies in Romania	Companies in Republic of Moldova	Companies in Bulgaria
Scope 1 (tCO ₂ eq)	27,243.67	3,681.24	422.70
Scope 2 location-based method (tCO ₂ eq)	152.71	2,548.78	143.19
Scope 2 market-based method (tCO ₂ eq)	143.17	2,548.78	143.19
Scope 3 (tCO ₂ eq)	9,108.36	8,549.04	2,221.50

We disclose the methodologies, significant assumptions, and emissions factors used to calculate our GHG emissions, ensuring transparency in our reporting. Any significant changes in the definitions of what constitutes our reporting undertaking, and its value chain are documented, along with their effects on year-to-year comparability.

For Scope 1 emissions, we quantified the emissions related to the use of fuels (diesel, gasoline, LPG, natural gas) and fugitive emissions related to refrigerants. In addition to these sources of emissions, we quantified the direct emissions (CO₂) that occur during the wine production process. For this assessment, we used our internal studies which quantifies the CO₂ emissions per each type of wine produced. Scope 2 emissions were calculated using both market- and location-based methodologies for Romania, where the electricity mix was available. In Republic of Moldova and Bulgaria, we used the same emission factor for market- and location-based methodology, since the information of electricity mix from the supplier was not available.

Table 13. GHG emissions calculation methodology

Emissions category	Methodology description / reason for category exclusion
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(1) Purchased goods and services	<p>Expenses for goods and services purchased by Purcari were quantified in monetary terms, and GHG emissions were calculated using spend-based method, for each type of expense and converting from:</p> <ul style="list-style-type: none"> o RON to euros, using the average EURO-RON exchange rate from 2024 o BGN to euros, using the average EURO-BGN exchange rate from 2024 o MDL to euros, using the average EURO-MDL exchange rate from 2024. <p>For the assessment of greenhouse gas (GHG) emissions related to this category, emission factors for Romania and Bulgaria were utilized. In the case of the Republic of Moldova, the emission factor for Romania was applied due to the unavailability of specific emission factors for the Republic of Moldova.</p>
(2) Capital goods	<p>Expenditures for capital goods purchased by Purcari were quantified in monetary terms, and GHG emissions were calculated using spend-based method, for each type of expense and converting from:</p> <ul style="list-style-type: none"> o RON to euros, using the average EURO-RON exchange rate from 2024 o BGN to euros, using the average EURO-BGN exchange rate from 2024 o MDL to euros, using the average EURO-MDL exchange rate from 2024. <p>For the assessment of greenhouse gas (GHG) emissions related to this category, emission factors for Romania and Bulgaria were utilized. In the case of the Republic of Moldova, the emission factor for Romania was applied due to the unavailability of specific emission factors for the Republic of Moldova.</p>
(3) Fuel and energy-related Activities (not included in Scope1 or Scope 2)	<p>The upstream emissions related to the fuel consumption (diesel, petrol, LPG and natural gas) used by Purcari were quantified. For this, the fuel consumption reported in the calculation of emissions in scope 1 was considered, for which an emission factor related to the production and transport of the fuel to the place of consumption was used. The upstream emissions were also calculated, related to losses in the transport and distribution of electricity used by Purcari, using the same amount of electricity reported in the calculation of GHG emissions in scope 2, but applying an emission factor related to losses in the transport and distribution of electricity. The database used is DEFRA.</p>
(4) Upstream transportation and distribution	<p>Expenses for upstream transportation and distribution purchased by Purcari were quantified in monetary terms, and GHG emissions were calculated using spend-based method, for each type of expense and converting from:</p> <ul style="list-style-type: none"> o RON to euros, using the average EURO-RON exchange rate from 2024 o BGN to euros, using the average EURO-BGN exchange rate from 2024 o MDL to euros, using the average EURO-MDL exchange rate from 2024. <p>For the assessment of greenhouse gas (GHG) emissions related to this category, emission factors for Romania and Bulgaria were utilized. In the case of the Republic of Moldova, the emission factor for Romania was applied due to the unavailability of specific emission factors for the Republic of Moldova.</p>
(5) Waste generated in operations	<p>The total quantities of waste generated are collected, broken down by waste types; quantified in monetary terms, and GHG emissions were calculated using spend-based emission factors from the Exiobase database.</p> <p>For the assessment of greenhouse gas (GHG) emissions related to this category, emission factors for Romania and Bulgaria were utilized. In the case of the Republic of Moldova, the emission factor for Romania was applied due to the unavailability of specific emission factors for the Republic of Moldova.</p>
(6) Business travelling	<p>For the calculation of GHG emissions associated with this category, emission factors from the Exiobase monetary database were used, and GHG emissions were calculated using spend-based method, for each type of expense and converting from:</p> <ul style="list-style-type: none"> o RONto euros, using the average EURO-RON exchange rate from 2024 o BGN to euros, using the average EURO-BGN exchange rate from 2024

	<ul style="list-style-type: none"> MDL to euros, using the average EURO-MDL exchange rate from 2024. <p>For the assessment of greenhouse gas (GHG) emissions related to this category, emission factors for Romania and Bulgaria were utilized. In the case of the Republic of Moldova, the emission factor for Romania was applied due to the unavailability of specific emission factors for the Republic of Moldova.</p>
(7) Employee commuting	Not quantified.
(8) Upstream leased assets	Purcari does not lease any assets upstream.
(9) Downstream transportation	<p>For the calculation of GHG emissions associated with this category, emission factors from the Exiobase monetary database were used, and GHG emissions were calculated using spend-based method, for each type of expense and converting from:</p> <ul style="list-style-type: none"> RON to euros, using the average EURO-RON exchange rate from 2024 BGN to euros, using the average EURO-BGN exchange rate from 2024 MDL to euros, using the average EURO-MDL exchange rate from 2024. <p>For the assessment of greenhouse gas (GHG) emissions related to this category, emission factors for Romania and Bulgaria were utilized. In the case of the Republic of Moldova, the emission factor for Romania was applied due to the unavailability of specific emission factors for the Republic of Moldova.</p>
(10) Processing of sold products	The products are finished products and are not further processed.
(11) Use of sold products	Not quantified.
(12) End-of-life treatment of sold products	<p>For the calculation of GHG emissions associated with this category, emission factors from the Exiobase monetary database were used, and GHG emissions were calculated using spend-based method, for each type of expense and converting from:</p> <ul style="list-style-type: none"> RON to euros, using the average EURO-RON exchange rate from 2024 BGN to euros, using the average EURO-BGN exchange rate from 2024 MDL to euros, using the average EURO-MDL exchange rate from 2024. <p>For the assessment of greenhouse gas (GHG) emissions related to this category, emission factors for Romania and Bulgaria were utilized. In the case of the Republic of Moldova, the emission factor for Romania was applied due to the unavailability of specific emission factors for the Republic of Moldova.</p>
(13) Downstream leased assets	Purcari does not rent any downstream assets.
(14) Franchises	Purcari does not operate in franchises business model.
(15) Investments	Not quantified.

The percentage of Scope 3 emissions calculated using primary data is 100% (quantitative or spent amount), and we disclose any categories of Scope 3 emissions that have been excluded from our inventory.

2.2. Water and Marine Resources

Our commitments:

- ✓ Improve water treatment with modern water treatment stations in all the Group's wineries.
- ✓ Optimize consumption of water, energy, and reduce CO2 emissions in all wineries.
- ✓ Expand the irrigation systems: 300 ha at Purcari are complete; 700 ha are under development in the vineyard of Alexandru Ioan Cuza.

Table 14. Water and marine resources IROs overview

Water Consumption				
IRO Type	IRO label	Policies	Actions	Targets
Actual negative IMPACT	Intensive Water Consumption in Viticulture	Currently no formal policy.	<ul style="list-style-type: none"> Reducing irrigation volume by 15% through improved moisture retention techniques. Transitioning to drought-resistant native grape varieties. Implementing precision irrigation systems with flow meters and soil sensors. Using remote sensing tools for customized irrigation schedules. Developing a formal water management policy aligned with EU and FAO standards. 	<ul style="list-style-type: none"> Reduce water consumption by 15–30% depending on conditions. Limit groundwater extraction through efficient subsurface drip irrigation and fertigation systems Have no environmental compliance breaches from wastewater treatment

IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

To ensure responsible management of water and marine resources, Purcari Wineries Group employs a detailed approach to assess impacts, risks, and opportunities linked to our operations and value chain. We use a combination of methodologies, assumptions, and tools to screen our assets and activities, capturing both real and potential impacts. This includes assessing our operational footprint, as well as the upstream and downstream activities within our value chain. The screening process allows us to identify key areas where water usage and marine resource management may pose risks or present opportunities for improvement. Given the water-intensive nature of wine production, where approximately 450 liters of water are needed to produce 1 liter of wine, we recognize the significant demand for water resources, especially in the arid regions of Moldova and Romania.

Our methodologies include:

- Monitoring of irrigation volumes, rainfall, and evapotranspiration rates

- Soil analysis and water retention capacity assessment conducted under the Vine & Soil project
- GIS mapping and ARP (Automatic Resistivity Profiling) to understand water availability at parcel scale
- Use of climate scenario projections to estimate future drought frequency and irrigation needs

Assumptions are based on average historical water use for vineyard irrigation and cellar operations, as well as anticipated regional water stress exacerbated by climate change. Tools employed include soil sensors, satellite imaging, and scenario analysis aligned with regional climate adaptation models.

Recognizing the critical role of community and stakeholder input in water stewardship, Purcari Wineries Group has initiated targeted consultations in areas where it operates and sources materials. These engagements focus on gathering local insights into water availability, usage conflicts, and ecosystem sensitivity.

Consultation methods include:

- On-site community meetings in Ștefan Voda and Cahul districts (Moldova)
- Feedback sessions with local farmers and suppliers during seasonal agricultural planning
- Collaborative workshops with academic partners, including the Institute of Pedology, Agrochemistry and Soil Protection "Nicolae Dîmo"
- Participation in regional environmental forums and roundtables hosted by Moldovan and Romanian authorities

Stakeholders consulted:

- Local vineyard workers and neighbouring farmers
- Environmental NGOs
- Regional water authorities and inspectorates
- Research institutions involved in the Vine & Soil Projects

Key findings from consultations:

- Community concern about over-extraction of groundwater for vineyard irrigation during drought-prone periods
- Need for improved irrigation efficiency and rainwater harvesting systems to minimize pressure on local aquifers

These findings have informed our evolving water management approach, including efforts to:

- Reduce irrigation dependence by increasing soil organic matter and retention capacity
- Incorporate drought-resistant indigenous grape varieties

As part of our next steps, we aim to develop and formalize our Water Stewardship Plan, ensuring stakeholder voices remain central to sustainable resource use.

E3-1 – Policies related to water and marine resources

While Purcari Wineries Group does not yet have a formal standalone Water and Marine Resources Policy, we have implemented a series of structured actions, technical solutions, and practices that demonstrate our commitment to the responsible management of water. These are embedded in our broader sustainability and viticultural frameworks, forming the foundation for a future integrated policy.

Our water management practices are designed to reduce consumption, improve irrigation efficiency, and treat wastewater effectively. Although not yet formalized in a single policy document, these practices are consistently applied across our operations.

We prioritize responsible sourcing of water by using groundwater and rain-fed systems, depending on the vineyard location, and we regularly assess water availability and potential stress through agronomic and climatic data. We invest in subsurface and drip irrigation systems, which deliver water directly to the root zone, significantly reducing evaporation and improving water use efficiency. By minimizing water loss to evaporation and ensuring that plants receive moisture exactly where they need it, we promote healthier plant growth and improved crop yields. These systems are currently installed at Purcari, Etulia, and Timbrus estates, with expansion plans in 2025. In addition, vineyard soil moisture levels are monitored regularly to avoid over-irrigation.

In addition to our irrigation practices, Purcari Wineries Group is committed to efficient water use in vineyards and minimizing resource wastage. Although the Group does not have a formal stated policy on Water Management, it has implemented projects as primary measures prior to establishing such a policy. These include the implementation of advanced drip irrigation and ferti-irrigation technology, along with a monitoring system to optimize water consumption in viticulture. This technology ensures efficient use of resources and minimizes wastage, aligning with our sustainable viticulture practices.

Furthermore, we have implemented modern water treatment plants at all our locations, including the operation of a wastewater treatment plant at the Purcari production site, to ensure that all wastewater is managed effectively. We remain committed to installing water treatment plants in any future locations to uphold our standards of sustainability. These systems, combined with runoff barriers, ensure no untreated effluent enters nearby ecosystems. Measures are implemented firstly at Chateau Purcari, where the estate is situated near protected natural zones and community water sources.

We also monitor and minimize the use of phytosanitary products, applying integrated pest management (IPM) principles to reduce chemical runoff.

Our policies also encompass product and service design, focusing on addressing water-related issues and preserving marine resources. This includes evaluating the water footprint

of our products and seeking innovative solutions to reduce water consumption throughout our production processes.

Our product design focuses on minimizing the water footprint during the winemaking process and packaging stage. We are exploring the use of:

- Lightweight glass bottles to reduce water used in manufacturing,
- Dry cleaning of barrels and tanks where feasible,
- Automation of bottle washing equipment for reduced water flow per bottle.

We also participate in joint research efforts (e.g., through the Native Project and Rara Neagra 2.0) to test grape varieties that require less irrigation, thus lowering long-term water demand.

Several of our vineyard sites, particularly in the Ștefan Voda and Etulia microzones in southern Moldova, experience moderate to high water stress, particularly during July–August. We have committed to:

- Reducing irrigation volume by 15% by 2026 through improved moisture retention (mulching, cover crops),
- Continuing transition to drought-resistant Native varieties such as Rara Neagra and Feteasca Neagră, requiring less supplemental irrigation.

Water-saving technologies in place include:

- Precision irrigation systems (flow meters, soil sensors),
- Remote sensing tools via the Vine & Soil project,
- Monitoring pH, organic content and retention potential per plot to customize irrigation schedules.

We acknowledge the importance of formalizing our water-related practices into a cohesive policy framework. This policy is currently under development and will align with EU Water Framework Directive, FAO recommendations, and where applicable, Alliance for Water Stewardship standards.

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

Since 2021, Vinaria Purcari, part of Purcari Wineries Group, has embarked on a significant initiative to enhance water management through the implementation of an advanced underground drip irrigation and fertigation system. This project began with a feasibility study and the identification of best practices in precision irrigation in viticulture. The development phase included specifying the necessary equipment and selecting an appropriate water management system. By 2022, the installation of underground drip lines commenced, followed by rigorous testing and monitoring of the irrigation system. Training was provided to the team to ensure optimal functioning and durability of the system.

In 2024, the entire irrigation system will be commissioned, covering an area of 300 hectares, with plans for expansion to up to 500 hectares. This system is integrated with a digital platform equipped with soil moisture sensors and a weather station, enabling precise adjustment of irrigation processes based on climatic conditions and the vine's growth stages. The implementation of this technology has led to water savings of between 15% and 30%, depending on annual weather conditions, soil type, rootstock, and grape variety. Subsurface

drip irrigation ensures the targeted delivery of water directly to the root zone, significantly reducing evaporation and water loss. Direct application of fertilizers to the root system improves nutrient efficiency, supporting healthier and more uniform plant growth. This system also contributes to plant health by maintaining a dry soil surface, which reduces weed development and allows for the elimination of herbicides in favor of physical soil maintenance methods. Lower surface moisture also decreases disease incidence, thereby reducing the need for fungicide treatments. Collectively, these practices contribute to environmental protection and more efficient use of water resources.

To implement and optimize this system, Purcari Wineries Group has invested €3 million and worked closely with experts in precision agriculture and agricultural engineering. Collaborations with leading suppliers of irrigation equipment, digital platform developers for crop monitoring, and agricultural research institutions ensured that the technology was adapted to regional conditions and aligned with best viticultural practices. Purcari Wineries Group plans to extend this innovative subsurface irrigation technology to its other vineyard holdings, further enhancing the benefits already observed—water conservation, optimized fertilizer use, and reduced environmental impact—while reinforcing our commitment to sustainable agriculture and the responsible stewardship of natural resources, all in support of high-quality wine production.

In addition to irrigation advancements, Purcari Wineries Group has implemented a wastewater treatment plant designed to efficiently treat wastewater generated from technological processes, particularly winemaking. This plant ensures that treated water meets current environmental standards, offering key benefits such as the reduction of natural water pollution through biological and mechanical wastewater treatment. It also promotes the responsible reuse of resources, where possible, for irrigation or other non-potable purposes. Continuous monitoring of water quality parameters is conducted to ensure strict control of environmental emissions.

All actions are aligned with Purcari's internal sustainability objectives. While a formal Water and Marine Resources Policy is not yet in place, actions have been prioritized based on materiality assessments and operational needs. Performance is evaluated using internal indicators related to:

- Volume of water used per liter of wine;
- Area under precision irrigation;
- Volume of wastewater treated;
- Reduction in agrochemical use due to irrigation-linked improvements.

Progress is regularly reviewed by the Sustainability Working Group, with oversight from the Executive Team and reporting to the Board of Directors.

Although Purcari Wineries Group has not yet adopted a standalone water and marine resources policy, the Group has implemented substantial technical measures and operational protocols. These form the de facto basis for a future policy, which is expected to be formalized as part of the Group's updated Sustainability Strategy.

The absence of Taxonomy alignment does not affect the materiality or execution of these water-related measures. Nevertheless, once the formal policy is in place, Purcari will assess the extent to which these actions could be eligible or aligned with the EU Taxonomy Regulation under the "Sustainable Use and Protection of Water and Marine Resources" objective.

E3-3 – Targets related to water and marine resources

We have established specific targets related to water and marine resources to effectively track the progress of our sustainability initiatives. These targets are designed to address material impacts, risks, and opportunities associated with water management and marine resource stewardship.

Our measurable water-related target is to achieve a 15–30% reduction in irrigation water use, depending on climatic conditions, soil type, and grape variety. This is tracked via digital monitoring tools integrated with soil moisture sensors and weather data.

In addition, we have two other strategic goals for minimizing our impact on water resources, which have not been formalized as measurable targets:

- **Reduction of Water Withdrawals:** Our goals include a focus on reducing water withdrawals from all sources, ensuring sustainable use of water resources. In this sense, we aim to limit groundwater extraction through efficient subsurface drip irrigation and fertigation systems, covering currently 300 hectares, with expansion planned to 500 hectares.

Status 2024: Reduced need for herbicides and fungicides due to better moisture control.

- **Reduction of Water Discharges:** We aim to minimize water discharges, ensuring that any wastewater released meets regulatory standards and does not harm local ecosystems. Our goal is to have no environmental compliance breaches from wastewater treatment; treated water meets required standards and can be reused.

Status 2024: No environmental compliance breaches from wastewater treatment; treated water meets required standards and can be reused.

In addition to these goals, our general commitments include improving water treatment with modern plants in all locations, optimizing water consumption in all wineries, and continuing the development of irrigation systems. After successfully finalizing irrigation for 300 ha at Purcari, we are now focused on developing irrigation for the Alexandru Ioan Cuza vineyard, which spans 700 ha, to secure sustainable development. These targets are mandatory and align with relevant legislation. Both initiatives align with Purcari's commitment to sustainable agriculture, water conservation, resource efficiency, and environmental protection.

Table 15. Water and marine resources targets

MDR-T Requirement	Reduce water consumption by 15–30% depending on conditions.
Relationship to Policy Objectives	N/A
Defined Target Level	15–30% reduction
Scope of the Target	300 hectares currently, with potential expansion to hectares
Baseline Value and Base Year	No exact numerical baseline provided, but water consumption and environmental impact prior to 2021 serve as the implicit baseline.
Period to Which the Target Applies	2021 – present, with continued implementation and performance monitoring.
Indication of Milestones or Interim Targets	2021: Conducted a feasibility study, best practice benchmarking, equipment specification design, and water quality analysis.

	<p>2022–2023: Installed and tested subsurface drip irrigation lines, trained field teams in operation and maintenance to ensure long-term sustainability.</p> <p>2024: Fully commissioned the system across 300 hectares at Vinaria Purcari, with integration of soil moisture sensors and a weather station into a digital monitoring platform.</p> <p>Ongoing: Expansion plans and continuous monitoring.</p>
Description of Methodologies and Significant Assumptions	Use of digital platforms with soil moisture sensors and a weather station to adapt irrigation schedules. Assumptions include climate variability, soil type, grape variety, and rootstock behavior as key factors in projecting 15–30% water savings. Data is collected through digital monitoring tools and weather stations, with potential iterative optimization as technology is rolled out further.
Target Related to Environmental Matters is Based on Conclusive Scientific Evidence	Based on conclusive scientific evidence, supported by collaboration with agricultural engineers, precision agriculture experts, digital platform developers, and research institutions.
Disclosure of How Stakeholders Have Been Involved in Target Setting	Internal stakeholders (technical and vineyard teams) were trained; external stakeholders included equipment suppliers, platform developers, and research institutions consulted during system development and adaptation.
Description of Performance Against Disclosed Target	Achieved 15–30% water savings depending on site-specific conditions.

Metrics are tracked using digital platforms integrated with soil moisture sensors, weather station data, and crop growth models. Assumptions include water savings and chemical reductions based on comparative performance with conventional irrigation. Site-specific conditions (climate, grape variety, rootstock, soil) influence results. Wastewater treatment metrics rely on real-time monitoring of key water quality parameters before reuse or discharge. System design and performance evaluation were informed by feasibility studies and precision agriculture research. Agricultural research institutions, precision agriculture experts, engineering consultants, irrigation system suppliers, and digital platform developers provided validation for our targets. These partners were involved in the design, testing, optimization, and validation of the irrigation and wastewater treatment systems to ensure their effectiveness and alignment with best practices.

E3-4 – Water consumption

Table 16. Water resources

Water resources	2024
Total water consumption in operations	100,000 m ³
Total water consumption in areas at water risk (including areas of high-water stress)	~10,000 m ³
Total water recycled and reused	n/e
Total water stored and changes in storage	~35,000 m ³
Water intensity, calculated as total water consumption in operations in m ³ per million EUR net revenue	~1,309 m ³ per million EUR

Contextual information regarding water metrics

- The primary water sources are local groundwater wells and municipal supply, depending on each winery site (Purcari, Bostavan, Bardar). Water basins are not classified as high-risk but are sensitive to seasonal droughts. No significant contamination risk has been identified.
- Data is compiled based on local water bills, meter readings, and estimates for vineyard irrigation volumes during dry years. No advanced ISO 14046 Water Footprint standard is yet applied, but good practice for internal reporting is followed.
- Water use information is calculated and estimated, based on internal operational data, meter readings, and supplier invoices. Direct measurements are partly in place for main production sites.
- The Group currently uses standard vineyard irrigation benchmarks and winery water-use coefficients per hectare of planted vineyards and per ton of grapes processed. Sector-specific factors include regional rainfall patterns, DOC requirements (irrigation allowed only in drought years), and seasonal water needs for sanitation and processing.

2.3. Biodiversity and Ecosystems

Our commitments:

✓ Invest in ecological and biodynamic vineyards.

Table 17. Biodiversity and ecosystems IROs overview

Impacts on the extent and condition of ecosystems				
IRO Type	IRO label	Policies	Actions	Targets
OPPORTUNITY	Habitat Conservation Activities	<ul style="list-style-type: none"> • Biodiversity Policy Framework: To be developed by 2030, aligning with national agricultural standards and PGI/DOC regulations. 	<ul style="list-style-type: none"> • Vine & Soil Project: Enhancing soil health and carbon sequestration. • Native Project: Conversion to organic vineyards. • Stakeholder Engagement: Collaboration with local agronomists, scientific partners, and communities. 	<ul style="list-style-type: none"> • Contribute to an increase of 1‰ in the FAO biodiversity indicator for Moldovan vineyards by 2030. • Complete the Vine & Soil project by 2027 and convert 25 hectares to organic practices. • Align with EU Biodiversity Strategy for 2030 and SDGs 12, 13, and 15.

				<ul style="list-style-type: none"> Establish a biodiversity transition plan and monitoring framework by 2030.
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E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model

In 2024, Purcari Wineries Group took significant steps toward integrating biodiversity and ecosystems considerations into our strategic framework and business model. Our Sustainability Charter reflects our long-term commitment to protecting and preserving our natural heritage, which includes careful management of soil health, plant health, and biodiversity within our vineyards and surrounding landscapes.

Although we do not yet have a formal, stand-alone biodiversity and ecosystems transition plan, we aim to develop a structured biodiversity risk and opportunity assessment, together with a roadmap for measurable actions, by the end of 2030. This work will build on projects already underway, such as the Vine & Soil project, our Native Project (conversion to organic vineyards), strict adherence to PGI/DOC viticulture rules, and the expansion of soil and carbon sequestration practices (e.g., grass seeding between rows).

Resilience analysis:

In 2024, we began evaluating how resilient our business model is to physical, transition, and systemic biodiversity-related risks. This includes:

- Physical risks (e.g., soil degradation, drought, pests)
- Transition risks (e.g., evolving regulatory requirements for sustainable agriculture)
- Systemic risks (e.g., loss of local biodiversity affecting vineyard productivity and resilience)

Key assumptions made:

- Our vineyard soils (carbonate chernozem) have high natural fertility and carbon storage potential.
- Climate change may increase the risk of drought and pest pressure in the coming decade.
- Customer and investor expectations will increasingly demand proof of biodiversity-positive practices.

Time horizons used:

- Short-term: 2024–2027 — completion of the Vine & Soil project and continued conversion of vineyards to organic practices.
- Medium-term: 2025–2030 — development of formal biodiversity transition plan, targets, and monitoring framework.

- Long-term: beyond 2030 — achievement of improved biodiversity metrics (e.g., contribute to an increase of 1‰ in the FAO biodiversity indicator for Moldovan vineyards by 2030).
-

Stakeholder involvement:

We engage a wide range of stakeholders in developing this strategy, including local agronomists, scientific partners (e.g., the Geocarta partnership for soil mapping), local institutes, universities, and DOC/PGI authorities. We also consider input from local communities and industry experts to ensure alignment with regional biodiversity priorities and sustainable viticulture best practices.

Policies:

Currently, we apply a combination of national agricultural standards, PGI/DOC viticulture regulations, and our own sustainability projects to manage material impacts, risks, dependencies, and opportunities related to biodiversity and ecosystems. A formal biodiversity policy framework will be developed in parallel with our transition plan by 2030.

E4-2 – Policies related to biodiversity and ecosystems

To effectively manage our material impacts, risks, dependencies, and opportunities related to biodiversity and ecosystems, we have adopted a series of policies and initiatives. Our double materiality assessment has highlighted biodiversity as a critical area of focus, necessitating robust actions to ensure sustainable business development. The following initiatives exemplify our commitment to improving biodiversity in our operations:

- **Environmental Sustainability Commitment:** We are committed to sustainable vineyard management through the use of cover crops and organic practices to restore ecosystems and promote biodiversity. As mentioned prior, the Group has implemented grass seeding on some of its vineyards.
- **Project Stimunn (Ecoboost):** This project involves the implementation of strategic actions to increase productivity, profitability, and resilience of vineyards, particularly by reducing the amount of phytosanitary products. It uses physical processes based on the stimulation of the vine's resistance to biotic factors (such as mildew and oidium) and abiotic factors (such as drought).
- **Project Rara Neagra 2.0:** This initiative focuses on identifying and collecting the most interesting biotypes of the Rara Neagra grape variety and using them as initial genetic material (intra-varietal diversity) for polyclonal selection. It includes prospection and diagnosis of viruses and phytoplasmas in the collected plant materials.

Both projects were launched in 2023, with the Group's director of Development, Research, and Innovation spearheading these initiatives at the beginning of 2024.

- **Project Stimunn (Ecoboost):** Reducing phytosanitary product use and enhancing vine resilience.
- **Project Rara Neagra 2.0:** Enhancing genetic diversity and resilience of the Rara Neagra grape variety.

Our production relies heavily on the health and wellbeing of the ecosystems that support our vineyards. Consequently, as such we are implementing measures that enhance conditions for biodiversity:

- **Use of Cover Crops:** Implementing grass seeding to improve soil health and promote biodiversity.
- **Organic Practices:** Reducing fertilizers and pesticide use to restore ecosystems and promote biodiversity.

E4-3 – Actions and resources related to biodiversity and ecosystems

At Purcari Wineries, we understand that biodiversity and ecosystem health are integral to our operations and the sustainability of the wine industry. As we navigate the complexities of modern agriculture, we recognize that preserving biodiversity is not just an environmental imperative but a strategic advantage that enhances the resilience and quality of our products. We are proud to share several key initiatives that reflect our commitment to these principles.

One such initiative is the **Rara Neagra 2.0 Project**, launched in 2023 with a planned investment of €1 million over a 10-year period. This ambitious project aims to improve the indigenous Rară Neagră grape variety through poly-clonal selection, conserving its biodiversity, and capitalizing on the diversity of its biotypes by planting new plots with enhanced genetic variability. In the initial phase, 34 vineyard plots with old Rară Neagră vines (over 35 years old) were surveyed, leading to the identification of approximately 160 distinct biotypes. These biotypes underwent rigorous health assessments to confirm their suitability as genetic material for the poly-clonal selection process.

Between 2025 and 2030, the Group plans to establish a biodiversity conservatory for the Rară Neagră variety, based on the selected biotypes. The conservatory will be officially recognized at the national level as a mother vine plantation, serving as a high-quality source of grafting material for future plantings. In collaboration with specialized winemaking institutions, the conservatory will support ampelographic studies, agronomic evaluations, and oenological assessments to facilitate the identification and propagation of the most promising biotypes for long-term cultivation.

By leveraging genetically diverse and healthy planting material, this initiative contributes significantly to the preservation and enhancement of the Rară Neagră variety's biodiversity, improves plant resilience to drought, frost, diseases, and pests, reduces dependency on chemical treatments, and supports adaptation to climate change. It preserves the regional wine heritage and ensures future development of high-quality viticulture. The project is designed as a pilot model that can be expanded to include other indigenous grape varieties, reinforcing the Group's strategic focus on biodiversity, quality, and sustainability.

Another significant initiative is the **ECOBOOST – Ecological Boost for Sustainable Viticulture**, launched in 2023 with a total investment exceeding €200,000 in UV Boosting technology. This forward-looking initiative aims to transform vineyard management through innovative and sustainable practices. At the core of the ECOBOOST project is the use of UV-C light technology to reduce reliance on chemical phytosanitary treatments. Field trials conducted in 2024 yielded promising results, demonstrating a 40% reduction in the use of chemical inputs, with a targeted reduction of up to 50%. This technology enhances plant resilience to abiotic stress, reduces soil and water contamination, lowers environmental

footprint by minimizing synthetic input usage, and delivers economic sustainability with an expected return on investment within 3 years.

The ECOBOOST system is currently deployed in two vineyards within the Group, with a clear strategy for future expansion across additional sites. This scalable model supports responsible resource management and aligns with Purcari's long-term sustainability objectives. Education and stakeholder involvement are fundamental to the project. In collaboration with UV Boosting, Purcari organizes hands-on training for vineyard teams, ensuring safe and effective use of the new equipment. Furthermore, the Group actively promotes knowledge sharing to encourage the adoption of sustainable practices beyond its own vineyards, inspiring broader industry transformation.

ECOBOOST directly contributes to global sustainability goals, including SDG 12 – Responsible Consumption and Production, SDG 13 – Climate Action, and SDG 15 – Life on Land. By combining cutting-edge technology, environmental stewardship, and community involvement, this project sets a new benchmark in sustainable agriculture. It enhances soil health, promotes biodiversity, and ensures more resilient and eco-friendly vineyard ecosystems, paving the way for a more sustainable and climate-resilient future in viticulture.

E4-4 – Targets related to biodiversity and ecosystems

Tracking the effectiveness of policies and actions is conducted through established targets that are both ambitious and thoughtfully crafted to align with our strategic goals and broader environmental objectives. These targets, informed by relevant aspects of the EU Biodiversity Strategy for 2030, are designed to address specific biodiversity and ecosystem challenges, ensuring our contributions to the overarching goals of the strategy.

Project 1: Rară Neagră 2.0 – Improving, Conserving Biodiversity and Capitalizing on the Biotypes of the Indigenous Rară Neagră Variety

This project supports the EU Biodiversity Strategy for 2030 and aligns with SDGs 2, 12, 13, and 15. It focuses on the identification, conservation, and propagation of the most promising 160 Rară Neagră biotypes through poly-clonal selection and the establishment of a genetic conservatory. The project aims to preserve biodiversity, promote sustainable agriculture, and enhance climate resilience. It applies to vineyards owned by Purcari Wineries in Moldova, with potential for expansion to other wineries and grape varieties. The project timeline spans from 2023 to 2033, with key milestones including the identification and assessment of 160 biotypes by 2024, the establishment of a genetic conservatory between 2025 and 2030, and full propagation and integration into cultivation by 2033. Ampelographic, agronomic, and oenological studies are conducted with specialized institutions, assuming biotype health, regional suitability, and institutional collaboration. Validation is provided by national winemaking institutions and independent viticultural researchers.

Description of Metric: Number of biotypes identified, assessed, and conserved (target: 160). Establishment and development of a genetic conservatory. Integration of selected biotypes into cultivation by 2033.

Methodologies and Assumptions: Ampelographic, agronomic, and oenological analyses performed in collaboration with scientific institutions. Assumes the biotypes

identified are viable for long-term propagation and aligned with terroir/climatic conditions. Tracking through documented assessments and conservatory progress.

Validation: National winemaking institutions and independent viticultural researchers engaged for scientific validation and cooperation.

Project 2: ECOBOOST – Ecological Boost for Sustainable Viticulture

This initiative supports the EU Green Deal, CAP 2023–2027, and SDGs 12, 13, and 15. It aims to reduce phytosanitary chemical use by 50% in treated vineyards through UV-C light technology, contributing to emission and pollution reduction, chemical input reduction, and plant resilience improvement. Currently, two vineyards are covered, with potential scale-up across all Group vineyards. The project timeline is from 2023 to 2027, with a 40% reduction achieved in 2024 trials and a target of 50% reduction by 2027. Comparative analysis of chemical usage pre/post UV-C implementation is based on trial data and operational assumptions of similar vineyard conditions. Validation is provided by technology partner UV Boosting, with internal agronomists and field teams involved in pilot execution and feedback.

Description of Metric: % reduction in phytosanitary chemical usage (target: 50% reduction). Measured against 2023 baseline of 100% conventional treatments. 40% reduction achieved in 2024 trials.

Methodologies and Assumptions: Comparative tracking of chemical application volumes before and after UV-C implementation. Assumes consistent vineyard conditions and pest pressure. Metrics supported by trial logs, treatment records, and environmental input analysis.

Validation: Technology partner UV Boosting offers technical support, performance insights, and validation of efficacy based on field trials. Internal agronomists and viticultural experts provide ongoing field evaluation

E4-5 – Impact metrics related to biodiversity and ecosystems change

Purcari Wineries Group's vineyards and operational sites are predominantly located in rural and semi-rural viticulture regions in Moldova, Romania, and Bulgaria, including the Ștefan Vodă, Codru, and Dealu Mare DOCs, which are not designated as IUCN protected areas or officially classified Key Biodiversity Areas (KBAs) under international frameworks.

Based on the available environmental assessments and site maps, the Group currently does not own, lease, or directly manage sites within or immediately adjacent to internationally recognised protected areas or designated KBAs. Consequently, no operational sites have been identified as negatively affecting such areas as of the 2024 reporting period.

However, we recognise that vineyards inherently interact with local ecosystems, soil quality, water resources, and landscape biodiversity. Therefore, our Vine & Soil project, Native Project, and PGI/DOC compliance practices serve as our main instruments for assessing and managing land use and its ecological impacts.

Number of sites negatively affecting protected or key biodiversity areas: 0

Total area of sites negatively affecting protected or key biodiversity areas: 0 hectares

Relevant metrics:

- Land-use change: Total vineyard area owned or managed: ~2,050 hectares (estimate for 2024), of which ~25 hectares are under conversion to organic viticulture (Native Project).
- Freshwater use change: Vineyards depend on rainfall and occasional supplementary irrigation in drought years; water consumption is managed according to national agricultural standards and PGI rules (organic fertilizers every 5–6 years, chemical fertilizers at recommended doses).
- Total use of land area: ~2,050 hectares (includes all vineyards in Moldova, Romania, and Bulgaria plus associated winemaking facilities).
- Ecosystem area coverage: Our operations directly interact with carbonate chernozem soils, local forest edges, hedgerows, and microhabitats that contribute to vineyard biodiversity. While we do not own or manage large natural habitats, our soil mapping and grass seeding actions contribute to ecosystem stability across vineyard parcels. The area covered by these ecosystem-focused initiatives is estimated at over 300 hectares as of 2024 (soil mapping target area).

Going forward, we aim to refine our biodiversity impact metrics and ecosystem area mapping by completing the Vine & Soil project and related biodiversity surveys by 2025. We also plan to adopt a more structured biodiversity monitoring framework in line with ESRS E4.

Chapter 3. Social

3.1. Own workforce

Our commitments:

- ✓ Providing secure jobs and competitive benefits
- ✓ Attracting and developing talent through external partnerships and internal growth paths.
- ✓ Funding training and professional development.
- ✓ Recognizing and rewarding performance through structured compensation systems.
- ✓ Upholding a socially responsible business model with lasting stakeholder engagement.
- ✓ Prioritizing employee development through continuous training, skill enhancement, and career growth opportunities
- ✓ Enhancing well-being and quality of life at work, especially for blue-collar workers

Table 18. Own workforce IROs overview

Secure Employment				
IRO Type	IRO label	Policies	Actions	Targets
Actual positive IMPACT	Contributing to Local Economic Growth	<ul style="list-style-type: none"> Internal Regulation Code of Conduct Conflict of Interest Policy (ensures transparent decision-making and integrity) Policy on Recruitment and Selection of Employees Policy on Employee Benefits across the Group Policy on Internship Program Management Health and Safety Policy Grievance Mechanism Procedures 	<ul style="list-style-type: none"> Expand employee welfare benefits (e.g., supplementary insurance, wellness support). Provide structured training & development for skills growth, including interns and new recruits. Promote youth employment through the internship programme. Ensure fair and merit-based recruitment aligned with local labour codes. Maintain a safe, secure workplace through robust security and health & safety measures. Strengthen employee engagement and social dialogue with clear grievance channels. Integrate fair labour practices in supply chain relationships through the Supplier Code of Conduct. 	<ul style="list-style-type: none"> Extend enhanced insurance and wellness benefits to cover >50% of permanent staff by 2025. Deliver structured training to at least 65% of staff annually. Offer internships to local youth with a target of 10+ interns per year. Maintain full compliance with national Health & Safety requirements across all wineries and facilities.

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

At Purcari Wineries, we recognise that human capital is one of our greatest assets, and that the interests, views, and rights of our workforce are fundamental to our strategy and resilient business model.

As a leading employer in the regions of Purcari and Etulia, where our main production facilities are located, we employ over 890 individuals across our subsidiaries in Moldova, Romania, and Bulgaria, with a strong focus on local recruitment to support community development and economic stability.

We are committed to creating a safe, fair, and inclusive workplace that respects the human rights of all our employees. To ensure our business model remains aligned with the expectations and needs of our people, we gather direct feedback through Human Resources, which acts as the primary contact point for employee engagement and well-being.

Regular employee surveys, individual feedback sessions, open-door communication with HR, and performance appraisals help us identify concerns, gather suggestions, and measure satisfaction levels. This process provides valuable insights that directly support our 2027 Strategy, our Sustainability as well as wider social objectives.

Based on this feedback, and guided by our strategic commitments, we have introduced several enhancements in the recent year. These include:

- Expanded health insurance coverage to improve employee welfare.
- Structured training and development frameworks under our Learning and Development Policy, to build competencies and support professional growth.
- A clear focus on equality of opportunity, ensuring that all employees have access to fair and transparent recruitment, recognition, and advancement, as reflected in our Internal Regulation and Code of Conduct.

Our commitment to workforce development and well-being is a cornerstone of our sustainability approach. Specifically, we focus on:

- Supporting employees in building their skills and capabilities, with regular training initiatives.
- Fostering a working environment that promotes well-being, supported by our Employee Benefits Policy.
- Encouraging diversity, fairness, and equal opportunity, embedded in our Group-wide governance policies.

More information regarding how the Group engages with its own workforce to understand its interests and views can be found under [DR S1-2](#).

Our workforce encompasses full-time, part-time, seasonal, and temporary employees, covering production, administration, sales, and support roles. This includes various roles across production, administration, sales, and support functions. Each category of workers was taken into account when evaluating the potential material impacts resulting from our business activities.

The Group is dedicated to providing secure employment, fair benefits, and professional development opportunities with a strong focus on fostering long-term, respectful relationships with employees and local communities. This, in turn, supports local economic growth and resilience — as satisfied, secure employees are more likely to stay in the region, contribute to local prosperity, and enhance the social value we create as a Group.

S1-1 – Policies related to own workforce

Purcari Wineries Group prioritizes the well-being and development of its employees through fair labour practices, health and safety measures and opportunities for growth and training. These principles are outlined in Purcari's ethical standards, defined by the Group's Code of Regulations.

The code outlines the ethical standards and responsibilities of employees, covering core aspects such as:

- Work time management and workplace best practices
- Employee records and documentation
- Labor protection and medical examinations
- Environmental and workplace hygiene requirements
- Rules for Company drivers and use of Company vehicles
- Compliance requirements and Non-discrimination principles
- Employer and Employee rights, duties and responsibilities
- Disciplinary Responsibilities
- Procedures for resolving employee complaints and grievances

Supporting internal governance documents relevant for workforce management include:

- Internal Regulation - defines employee conduct, rights and obligations, workplace practices, and complaint resolution.
- Conflict of Interest Policy – guides impartial and ethical decision-making across all subsidiaries.
- Policy on Recruitment and Selection of Employees – ensures transparent, fair, and merit-based hiring processes.
- Policy on Employee Benefits Across the Group – outlines provisions such as extended health insurance and other employee welfare measures.
- Policy on Learning and Development – supports upskilling and professional growth through structured training initiatives.
- Policy on Internship Program Management – structures early career pathways for students and graduates.
- Health and Safety Guidelines – set out occupational safety rules and accident prevention measures.
- Remuneration Policy – defines fair and transparent compensation principles for directors and relevant management roles, in line with EU and national legal requirements.

Furthermore, Purcari abides by the following local Labor Regulations:

- Moldova: Labour Code of the Republic of Moldova (No. 154/2003)
- Romania: Romanian Labour Code (Law No. 53/2003, with subsequent amendments)
- Bulgaria: Bulgarian Labour Code (SG No. 26/1986, updated)

Purcari Wineries provides equitable working conditions aligned with the Group's Code of Regulations, and each respective subsidiary's local Labor Law. Employees and all stakeholders are treated fairly and with respect, in alignment with the Group's commitment to respecting and upholding human rights, encouraging all subsidiaries to follow suit.

Workplace Health and Safety

At Purcari, we prioritize the health and safety of our employees across all subsidiaries by ensuring safe and hygienic working conditions. We provide access to clean water, sanitation, and hygiene facilities for all our staff members. Our commitment to adhering to applicable safety and health laws, regulations, and policies creates a comfortable and effective work environment equipped with the necessary resources.

Since 2020, we have outsourced our environmental protection, sanitation, fire safety, occupational health and safety, and quality assurance services to SSM organizations (SSM Protect SRL (MD), OHS – PFA Enache D. Elena Steliana (RO) and Medico-engineering EOOD (BG)). Each of our subsidiaries designates an employee responsible for monitoring and training in these critical areas to prevent potential issues.

To maintain workplace safety, we implement stringent health and safety regulations tailored to comply with national legislation in each subsidiary. Our key measures include:

- Clearly defined job descriptions and scopes of duties.
- Mandatory health and safety training for all our employees.
- Protocols for fire prevention, occupational safety, and hygiene.
- Medical clearance for new hires and regular employer-paid medical check-ups.
- Strict hygiene rules for our production staff, including restricted access to production zones, prohibition of food consumption in these areas, and mandatory use of sanitary materials.

Our Health and Safety Guidelines function as a practical procedure for accident prevention and risk management, ensuring compliance with national legislation and sector-specific requirements.

At Purcari, we understand the food-related nature of our products, which is why hygiene in production areas is rigorously enforced. Access to these areas is limited to authorized personnel only, and all our employees undergo periodic medical evaluations, with confidential health records securely maintained by us.

Grievance mechanisms for employees

The Group has mechanisms in place to ensure that employees can express grievances without fear of retaliation. This procedure aims to resolve issues promptly and fairly.

The Ethical Standards are defined at Purcari Wineries Public Company Limited by the Group's Code of Regulations, drafted in accordance with the provisions of labor legislation, Law No. 31/1990 regarding commercial companies, the Group's Memorandum and Articles of Association, Policies and other normative acts that regulate labor protection.

The Code provides its employees as well as other stakeholders (e.g. Clients, Suppliers, Business Partners) with communication channels to report safely any breaches or misdemeanours. Employees are obligated to signal immediately any irregularities by making an anonymous or personal report. At Purcari Wineries, any reports of violations, no matter through which channel they are signalled, are reviewed, and handled by the Human Resources Department in accordance with internally adopted regulations. At present, the Group's Code of Regulations is implemented at the core subsidiaries of Purcari Wineries Group.

Employment Practices

Purcari's recruitment and selection process is designed to ensure that the right talent is placed in the right role at the right time, aligned with the Group's strategic and operational needs. All recruitment practices are transparent, merit-based, and comply with internal policies such as the Code of Regulations, Policy on Recruitment and Selection of Employees, and the Conflict-of-Interest Policy.

Key supporting governance documents:

- **Code of Regulations**

Content & Scope: Defines the ethical standards, duties, rights, and obligations of employees, covering core aspects such as work time management, compliance, non-discrimination, labour protection, medical exams, and grievance procedures.

Most senior level responsible: Group Human Resources Department under the oversight of the Executive Team.

Standards & Stakeholders: Drafted in line with national labour legislation in Moldova, Romania, and Bulgaria. While the policy is developed internally, it reflects the interests of employees through HR's continuous feedback collection.

- **Policy on Recruitment and Selection of Employees**

Content & Scope: Outlines the procedures for attracting, selecting, and hiring qualified candidates in a fair, objective, and non-discriminatory manner. It ensures consistency, transparency, and compliance with labour laws.

Most senior level responsible: Group Human Resources Manager, with operational responsibility at subsidiary level.

Standards & Stakeholders: Based on applicable national labour codes; developed internally to align with the Group's ethical principles and in response to workforce needs identified through HR engagement.

- **Conflict of Interest Policy**

Content & Scope: Provides guidance on how employees and collaborators should handle situations where personal interests could conflict with their duties to the Group. Ensures impartiality and transparency in all recruitment and employment decisions.

Most senior level responsible: Executive Management and Group Legal/HR.

Standards & Stakeholders: Internal framework aligned with best governance practices. Employee input is incorporated through HR's advisory role and ongoing communication channels.

Recruitment may be initiated due to:

- Changes in organisational structure
- The need to fill temporary or permanent vacancies due to internships, parental leave, extended medical leave, internal promotions, or the termination of employment contracts

Equal opportunity, transparency, and fairness are core principles embedded in every stage of the process. By maintaining clear standards, responsibilities, and open communication, the Group ensures that its employment practices respect both legal requirements and the legitimate interests of its workforce.

Remuneration Policy

The Remuneration Policy for the members of the Group's Board of Directors and relevant members of the management team, prepared pursuant to the relevant provisions of the Cypriot Law 111(I)/2021, transposed on 12 May 2021 into national law, Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/26/EC, regarding the encouragement of long-term shareholder engagement, was adopted by the Group by Resolution No. 5/2022 of the Annual General Shareholders' Meeting on April 28, 2022.

The goal of this policy is to provide a transparent overview of the compensation principles and methods we employ to ensure the sourcing, retention, and motivation of individuals in our administrative, management, or supervisory bodies, or those entrusted with performing such functions or responsibilities.

We view the performance of these functions and responsibilities as central to our long-term strategy for succeeding in a highly competitive global market and supporting the strong growth profile of our Company.

The Remuneration Policy Report is issued annually. The subsidiaries of Purcari Wineries Group do not have separate remuneration policies for the Board of Directors or Senior Management team.

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

Purcari Wineries Group recognizes that maintaining an open, ongoing dialogue with employees is essential to fostering a supportive, productive work environment and aligning operational practices with employee interests.

The Group does not have formal worker representatives, trade unions, works councils, or Global Framework Agreements (GFAs). Instead, employee engagement and consultation are carried out directly through the Human Resources Department, which acts as the primary point of contact for workforce concerns and feedback.

How employees are engaged:

- Employees are encouraged to share suggestions, concerns, and ideas through regular one-on-one discussions, open-door HR policies, and feedback channels managed at subsidiary level.
- Periodic employee satisfaction surveys and questionnaires are conducted to gather structured feedback on working conditions, benefits, workplace well-being, and training needs.

Findings from these consultations directly inform enhancements to the Group's employment practices, such as expanding health insurance coverage, improving training frameworks, and refining career development pathways.

Where possible, informal feedback is captured during performance appraisals and day-to-day HR interactions to help identify barriers or concerns in real time.

Frequency and oversight:

Engagement is ongoing and tailored to each site's operational realities. The HR team holds regular check-ins with employees, coordinates onboarding and exit interviews, and reports relevant workforce feedback to the Executive Management Team for consideration in strategic planning.

Example of impact:

This direct engagement approach has contributed to tangible improvements such as extended health insurance, strengthened learning and development programs, and a greater focus on equality and opportunity for advancement — aligning with the Group's strategic commitments under its 2027 Strategy and Sustainability Charter.

Barriers:

While the Group maintains open channels for employee dialogue, communication barriers such as hesitation to report sensitive issues or limited digital access in certain rural areas can occasionally constrain feedback collection. The HR Department works continuously to build trust and ensure that employees feel safe to voice concerns without fear of retaliation.

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

Unresolved grievances may be damaging to the morale of employees and the effective operation of the Group. To prevent any detrimental effects from arising, we have established a Grievance Procedure that ensures open and receptive communication channels for all our employees. Our grievance mechanism is designed to provide every team member with the

opportunity to express their concerns, ensuring that grievances are addressed in a timely and fair manner through a problem-solving approach and appropriate corrective actions.

This grievance mechanism applies to all employees within Purcari Wineries Group, and its core purpose is to offer guidance and support for addressing grievances at the earliest possible stage. We believe that the objectives of our Grievance Procedure can only be achieved if its functions are utilized effectively and properly.

To that end, we are committed to ensuring that:

- All employees are aware of their opportunity to express grievances.
- Employees feel safe and free to voice their concerns without fear of victimization, intimidation, or prejudice to their employment relationship.
- We encourage the use of the procedure while also emphasizing the importance of not abusing it with false grievances.
- Sensitive grievances are handled privately, maintaining confidentiality throughout the process.

As part of our commitment to this procedure, we have established an email address where our employees can express their grievances and share their concerns: yourvoice@purcari.wine. We are dedicated to fostering a supportive environment where every voice is heard and valued.

All reports of violations, regardless of the channel used, are reviewed and handled by the Human Resources Department. This department follows internally adopted regulations to ensure that concerns are addressed effectively.

Purcari has a formal grievance procedure that ensures all communication channels are open and receptive. This procedure aims to provide employees with adequate opportunities to express their grievances and ensures that these grievances are resolved in a timely and fair manner. A problem-solving approach is adopted, and appropriate corrective actions are implemented as necessary.

Protection against retaliation

Purcari Wineries Group strictly prohibits any form of retaliation, discrimination, or adverse treatment against any individual who raises a concern or submits a grievance in good faith. Retaliation is treated as a serious violation of our ethical standards and may lead to disciplinary measures under the Code of Regulations and applicable national labor laws in Moldova, Romania, and Bulgaria. The Group fully complies with the Labour Code of the Republic of Moldova (No. 154/2003), the Romanian Labour Code (Law No. 53/2003, as amended), and the Bulgarian Labour Code (SG No. 26/1986, updated), each of which provides statutory protection against retaliation for whistleblowers and employees exercising their right to raise concerns.

S1-4 – Taking action on material impacts on own workforce

At Purcari Wineries, we take a comprehensive approach to secure employment through several key actions. We ensure enhanced benefits for our employees, provide ongoing training and development opportunities, uphold fair labor practices, and promote equal opportunities in recruitment. These initiatives, among others, are integral to managing the positive impact of secure employment within our communities.

1. Enhancement of employee benefits: health insurance upgrades

In 2023, Purcari Wineries conducted a comprehensive welfare assessment, which revealed the necessity for enhanced health insurance coverage for M-1 and M-2 level employees. As a result, this upgraded coverage was implemented effective January 2024.

Scope: Applies to all eligible employees across Group subsidiaries in Moldova, Romania, and Bulgaria.

Time Horizon: ongoing, 2024 onwards

Progress in 2024: welfare review completed, and insurance enhancement implemented for 2024.

Expected outcomes and how is effectiveness tracked: All employees of M-1 and M-2 lever are expected to be covered by enhanced health insurance starting 2024. Performance and effectiveness are evaluated through the number and level of employees receiving enhanced health insurance coverage.

Resources allocated: Operating expenditures (OpEx) dedicated to expanded health insurance premiums.

2. Funding training programs aimed at professional development, with a focus on enhancing employee competencies and productivity

In 2024, the Group organized 6 training programs, 4 of which focused on professional development, benefiting 563 employees. These programs successfully benefited 563 employees, equipping them with the skills and knowledge necessary to improve their performance and contribute to the overall success of the organization.

Scope: Applies to all employees across Group subsidiaries, with training programs open to all levels and geographies.

Time Horizon: ongoing, 2024 onwards

Progress in 2024: Six training sessions held in 2024, reaching 563 employees.

Expected outcomes and how is effectiveness tracked: To ensure the effectiveness of these training initiatives, internal assessments are conducted regularly, considering both business needs and employee feedback. Each year we aim to maintain or grow the proportion of employees benefiting from development programmes

Resources allocated: Operating expenditures covering training costs, including facilitators and materials.

3. Recognizing and rewarding performance through structured compensation systems

Purcari Wineries respects and upholds human rights in all business operations. The Group ensures fair treatment of all employees, promotes open communication, and complies with all applicable labor laws.

Key practices include:

- Regular performance-based salary reviews.
- Regular salary reviews based on performance evaluations.

- Payment of wages above legal minimums.
- Compliance with maximum daily/weekly working hours.
- Overtime compensation per local labour legislation.
- Maintenance of safe, hygienic working environments with protective health measures.

Scope: Applies to all employees within the Group's subsidiaries.

Time Horizon: Ongoing.

Progress in 2024: Continued application of structured performance and compensation reviews aligned with regulatory requirements.

Expected outcomes and effectiveness tracking: Compensation practices are evaluated through HR audits and employee satisfaction surveys, ensuring alignment with Group policies and national laws.

Resources allocated: Operating expenditures covering payroll and benefits.

4. Implementation of a transparent and merit-based recruitment processes to align the right talent with organizational needs

Purcari Wineries ensures that the recruitment and selection process is transparent, merit-based, and aligned with both internal policies and local legislation. The objective is to match the right talent with the right position at the right time.

Recruitment may be initiated due to:

- Changes in organizational structure,
- The need to fill temporary or permanent vacancies arising from internships, parental leave, medical leave, internal promotions, or contract terminations.

Scope: Covers all subsidiaries and employee categories.

Time Horizon: Ongoing.

Progress in 2024: Continued adherence to transparent and fair recruitment practices.

Expected outcomes and effectiveness tracking: Success is monitored through recruitment records, time-to-fill metrics, and candidate/manager feedback surveys.

Resources allocated: Operating expenditures for recruitment advertising, assessments, and HR personnel time.

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

The table below delineates the two targets of the Group while addressing the MDR-T requirements for each, providing a comprehensive overview of our commitments and performance regarding our employees' well-being and skill development.

Table 19. Own workforce targets

MDR-T Requirement	Target 1: Extend enhanced insurance and wellness benefits	Target 2: Deliver structured training and development	Target 3: Offer internships to local youth	Target 4: Maintain full compliance with national Health & Safety requirements
Relationship to Policy Objectives	Supports the Group's commitment to employee welfare and aligns with internal policies and labor codes in Moldova, Romania, Bulgaria.	Aligns with internal policies and supports the Group's commitment to investing in human capital development and ensuring employee skill enhancement.	Supports youth employment and talent pipeline development, aligned with Group's social commitments.	Ensures safe working conditions; aligns with Health and Safety Policy and national legislation.
Defined Target Level	Extend enhanced insurance and wellness benefits to cover >50% of permanent staff by 2025.	Deliver structured training to at least 65% of staff annually.	Offer internships to local youth with a target of 10+ interns per year.	Maintain full compliance with national Health & Safety laws across all wineries and facilities.
Scope of the Target	Extend enhanced insurance and wellness benefits to cover >50% of permanent staff by 2025.	All employees across Group subsidiaries, including interns and new recruits.	Local youth recruited in subsidiaries' regions (Moldova, Romania, Bulgaria).	All subsidiaries' operations in Moldova, Romania, Bulgaria.
Baseline Value and Base Year	Coverage currently at ~M-1/M-2 levels, baseline year 2024.	548 employees trained in 2023 (baseline).	No baseline specified (program inception).	Full compliance baseline 2023.
Period to Which the Target Applies	Target completion by end of 2025.	Annual, starting 2023 onward.	Annual target, ongoing.	Continuous and ongoing.
Methodologies and Significant Assumptions	Internal welfare assessments, HR data on staff coverage, compliance with local labor laws.	Training needs identified via skills gap analysis and employee feedback.	Internship program management policy guides selection and training.	Regular audits and training sessions; engagement with external safety consultants (e.g., SSM Protect SRL).
Stakeholder Involvement	Internal consultations with HR, welfare assessments, and feedback mechanisms informed policy changes regarding employee welfare.	HR and employee engagement feedback used for program design.	HR leads internship programs; local community feedback considered.	HR, Operations, and Safety Officers coordinate compliance.
Performance Against Targets	Ongoing: Enhanced insurance coverage expanded in 2024; tracking coverage	563 employees trained in 2024; goal to maintain or increase participation.	Target to onboard 10+ interns yearly; tracking number of interns placed.	Compliance maintained with periodic reviews; safety training ongoing.

	percentage toward >50% goal.			
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S1-6 – Characteristics of the undertaking's employees

Table 20. Employees broken down by gender

Employees broken down by gender			
Average number of staff during the year			
Gender	December 31, 2024	December 31, 2023	Progress, %
Male	507	459	10.46%
Female	383	383	n/e
Total	890	842	5.70%

Table 21. Employees broken down by regions and countries

Employees broken down by regions and countries	
Region/ Country	December 31, 2024
Bulgaria	86
Moldova	652
Romania	152

Table 22. Employees broken down by contract type and gender

Employees broken down by contract type and gender						
Contract type	December 31, 2024			December 31, 2023		
Gender	Female	Male	Total	Female	Male	Total
Full-time employees	336	399	735	366	436	802
Part-time employees	12	56	68	17	23	40

Human capital is one of the key assets of Purcari Wineries. The Group makes efforts to ensure that its employees feel safe while performing their duties, that they receive support in their development as well as equal treatment.

During the year ended 31 December 2024, the average number of employees at Purcari Wineries Group was 890. This figure represents the headcount calculated by summing the total number of employees at the end of each month, providing a representative measure of staffing levels throughout the year. The employee count includes full-time and part-time staff across all subsidiaries. For further details, the total number of employees as of year-end and additional workforce information can be found in the Group's financial statements under "Note 29. Employee Benefits".

S1-9 – Diversity metrics

Table 23. Top management employees broken down by gender

Top management* employees broken down by gender						
Gender	December 31, 2024			December 31, 2023		
	Female	Male	Total	Female	Male	Total

Headcount Top management	13	39	52	9	31	40
% out of Total employees	3.39%	7.69%	5.84%	2.35%	6.75%	4.75%

Table 24. Employees broken down by age

Employees broken down by age						
Age category	December 31, 2024			December 31, 2023*		
	Female	Male	Total	Female	Male	Total
under 30 years old	19	31	50	17	38	55
between 30 and 50 years old	327	383	710	331	332	663
over 50 years old	37	93	130	35	89	124

*data for 2023 and 2024 was gathered based on +/- 5 year difference of age groups, i.e. under 25, between 25 and 60, and over 60.

S1-10 – Adequate wages

Purcari Wineries Group ensures that all employees receive wages that are adequate and above the minimum wage applicable in each country where the Group operates. This includes full-time, part-time, and seasonal employees. Annual salary reviews are conducted considering employee performance and prevailing market trends to maintain fair compensation.

The lowest wages paid to employees, excluding interns and apprentices, comply with or exceed relevant adequate wage benchmarks as defined by local legislation or international standards, including the criteria outlined by the European Sustainability Reporting Standards (ESRS).

Currently, there are no countries within the Group's operations where employees earn below the applicable adequate wage benchmark.

3.2. Consumer and End User

Our commitments:

✓ Making our customers the heart of our commitment:

- Paying close attention to our markets' expectations.
- Enriching our customers' experience.
- Preserving the richness and the identity of our terroirs and the quality of our products.

Table 25. Consumer and End User IROs overview

Access to (quality) information				
IRO Type	IRO label	Policies	Actions	Targets
Actual positive IMPACT	Providing accurate information and labelling	No formal policy. Alignment with EU regulations on transparency and consumer information.	<ul style="list-style-type: none"> • Collaborate with Bottlebook.me for digital e-labels (QR codes). • Maintain strong communication through website, 	Ensure 100% of wines with vintage 2024 and beyond sold in the EU include compliant e-labels.

			social media, and events.	
Health and safety				
IRO Type	IRO label	Policies	Actions	Targets
Actual positive IMPACT	Ensuring product safety and quality	Health and Safety Policy	<ul style="list-style-type: none"> • Ensure ongoing adherence to ISO certifications (ISO 9001:2015, ISO 22000:2018) for all wineries. • Regular monitoring and testing for quality and safety. 	<ul style="list-style-type: none"> • Ensure absence of pesticide residues in final products.
Security of a person				
IRO Type	IRO label	Policies	Actions	Targets
Actual positive IMPACT	Promoting safe social environments for alcohol consumption	Commitment to responsible alcohol consumption.	<ul style="list-style-type: none"> • Promoting Responsible Consumption • Organize wine tastings and cultural events promoting moderation. 	
Responsible marketing practices				
IRO Type	IRO label	Policies	Actions	Targets
Actual positive IMPACT	Promotion of responsible drinking	Commitment to promote wine culture responsibly.	<ul style="list-style-type: none"> • Adhere to responsible marketing guidelines. • Conduct training for marketing teams on ethical advertising. • Collaborate with industry associations for responsible advertising. 	

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

Purcari encourages dialogue by allowing reviews and launching questionnaires for feedback, making consumers feel empowered and involved in the wine community.

This includes conducting regular customer satisfaction surveys, hosting interactive events such as wine tastings and tours, and maintaining open communication on digital platforms and social media. Feedback from our diverse consumer segments—including general consumers, health-conscious buyers, social drinkers, and wine tourists—helps us understand their preferences, expectations, and concerns.

At Purcari Wineries, we are deeply committed to engaging in initiatives that create positive impacts for our consumers and the communities we serve. We believe in the power of transparency, which is why we provide detailed information about the origin of our wines, our production methods, and our sustainability practices. This approach empowers our customers to make informed purchasing decisions and fosters a deeper trust in our brand.

Health-conscious consumers benefit significantly from our stringent testing protocols, which ensure that all products are free from contaminants and comply with health regulations. This commitment to safety directly addresses the concerns of those who prioritize their well-being.

Additionally, our initiatives to promote safe drinking environments positively affect consumers who enjoy social drinking. By advocating for responsible consumption, we help create settings where individuals can enjoy wine without the risks associated with excessive drinking.

The local communities where we operate also reap the rewards of our Group's efforts to foster a culture of responsible drinking. These initiatives contribute to reducing alcohol-related issues, ultimately promoting the overall well-being of the community.

Finally, our dedication to responsible drinking, particularly for vulnerable consumers, plays a crucial role in enhancing public health and safety. By addressing the needs of these individuals, we not only support their health but also contributes to a more responsible drinking culture overall.

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

Access to (quality) information

While Purcari Wineries does not currently have a formal policy on direct-to-consumer (DTC) channels, the Group actively engages in practices that enhance transparency and consumer information. In particular, our wineries collaborate closely with the Bottlebook.me platform, applying digital e-labels (QR codes) to all wines exported to the European Union as well as those sold on the Moldovan market. This approach ensures full compliance with the latest EU regulations on nutritional and ingredient disclosures for wine products.

Purcari Wineries also maintains a strong communication presence across a wide range of channels. We share information about our wines through the Group website, Instagram, Facebook, printed brochures, as well as during wine festivals, trade exhibitions, and presentations, aiming to educate and engage consumers directly and meaningfully.

Health and safety

Purcari Wineries Public Company Limited continues to conduct its activity in accordance with the policy on Health and Safety approved on 16/11/2010 as well as continues to operate correspondingly with the procedures related to "Company activity in the fields of environmental protection, safety and health" approved on 18/11/2010.

The wineries within the Purcari Wineries Group adhere to the policies, procedures, and technical regulations related to health, safety, and environmental standards, as evidenced by our certifications in ISO 9001:2015 and ISO 22000:2018, both valid until December 2026.

- **ISO 9001:2015** focuses on quality management systems, ensuring that our processes consistently meet customer requirements and enhance satisfaction. It

emphasizes continuous improvement and operational efficiency across all aspects of our operations.

- **ISO 22000:2018** pertains to food safety management systems, establishing a framework for identifying and controlling food safety hazards throughout the supply chain. It ensures that our products are safe for consumption and comply with relevant food safety regulations.

Security of a person

While Purcari Wineries does not have a specific policy addressing personal security, we are committed to promoting responsible alcohol consumption through a holistic approach. We emphasize creating environments that encourage moderation and safety in drinking. We organize wine tastings and cultural events that celebrate the rich heritage and value of wine, fostering a responsible appreciation for our products.

Responsible marketing practices

While we do not have a specific responsible marketing policy in place, we are committed to promoting wine culture responsibly. Through our marketing and communication strategies, we actively engage in efforts to encourage responsible consumption habits, ensuring that our messaging aligns with our values of promoting a mindful and enjoyable wine experience.

We ensure that all consumers are treated fairly and with respect. This includes promoting responsible marketing practices, providing transparent information about our products, and ensuring that our operations do not contribute to any form of discrimination or harm. By embedding human rights considerations into our business practices, we aim to enhance the overall consumer experience and foster a positive relationship with our customers.

Our approach to respecting human rights is rooted in transparency, safety, and responsible consumption. We actively engage with our customers to understand their needs and concerns, ensuring that our products meet high safety and quality standards. Additionally, we promote responsible drinking through our marketing efforts and community initiatives, creating a safe and enjoyable environment for all consumers. By prioritizing these principles, we not only comply with relevant regulations but also contribute to the well-being of our consumers and the communities we serve, reinforcing our brand values and strengthening our reputation as a responsible and ethical winery.

S4-4 – Taking action on material impacts on consumers and end-users

Access to (quality) information

1. Collaborate with Bottlebook.me for digital e-labels (QR codes)

As part of our commitment to transparency and regulatory compliance, we are actively aligning our bottling and labelling processes with the updated European Union regulations governing wine labelling (for exported wines and wines from the Moldovan market). These include EU Delegated Regulation 2021/211, Regulation 1169/2011, and Regulation 2023/3257, which

introduce mandatory electronic labels (e-labels) for wines produced on or after 8 December 2023 for sale within the EU.

Purcari ensures all labels provide clear and accurate information regarding: wine origin and grape varieties, production methods, quality and certification standards.

In line with the new EU rules, all wines bearing a 2024 vintage or later must include a compliant e-label, accessible via a QR code of the physical bottle. For wines of the 2023 vintage, eligibility is based on whether the wine has completed production requirements, such as achieving minimum alcohol, acidity levels, and - if applicable - sparkling pressure.

As required, each e-label includes: product identification, ingredient list, nutritional values, packaging details, optional information (e.g. sustainability claims), and a new label is created for each product, size and vintage.

The back label, as well, contains a compliant sticker containing - energy value, a text next to the QR code indicating its purpose, including the word "Ingredients", the QR code with a quiet margin. As it was recommended for producers to avoid symbols near the QR code to preserve readability, our Product Development team ensured that the integrated design is compliant and is functional across multiple devices.

2. Maintain strong communication through website, social media, and events

We maintain a strong direct-to-consumer presence via the Group website, social media (Instagram and Facebook), and printed materials. These platforms are used to share comprehensive product information, including tasting notes and food pairings, to help consumers make informed choices and engage more deeply with our wines.

Transparency is further promoted through participation in wine festivals, trade fairs, and public presentations. These events, along with dedicated marketing campaigns, allow us to communicate directly with consumers, share insights about wine production and quality, and build lasting trust.

Health and Safety

1. Ensure ongoing adherence to ISO certifications for all wineries

We are committed to ensuring ongoing adherence to our ISO certifications across all our wineries. This commitment involves strict compliance with the policies, procedures, and technical regulations related to health, safety, and the environment, as outlined in our ISO certifications.

In our 2024 Internal Environmental and Social (E&S) Management System Report, we highlight the results of our ISO implementation, compliance, and quality control efforts. Through the integration of ISO 9001:2015, which focuses on quality management systems, and ISO 22000:2018, which addresses food safety management systems, we have established a robust framework for our operations.

As a result, we have developed a policy for the production and supply of wine products that prioritizes the highest quality while respecting both customer needs and legislative

requirements. We have also determined our strategic direction to maintain our leading position in the market, ensuring price competitiveness and enhancing our reputation through the loyal and professional attitudes of our employees towards our customers and the Company.

Furthermore, we have proactively identified risks and taken action to eliminate or mitigate their potential negative impacts on customer satisfaction. By analyzing potential hazards, we ensure effective control over our manufactured products, reinforcing our commitment to quality and safety in every bottle we produce.

2. Regular monitoring and testing for quality and safety

At Purcari Wineries Group, we are committed to strict adherence to laws and technical regulations concerning health, safety, security, and environmental standards. Each company within our Group holds the necessary authorizations, including the Authorization for the Emission of Pollutants, which allows us to control the release of pollutants into the atmosphere, and the Authorization for Special Use of Water, regulating our use of water resources in operations.

We are dedicated to producing high-quality wine products that are free from pesticide residues, a commitment supported by rigorous control measures throughout our production process. This dedication is validated by Certificates of Harmlessness, which confirm that each stage of production, from grape cultivation to the final wine product, meets safety standards. Additionally, we obtain Official Registration Certificates for Food Safety issued by the National Food Safety Agency, ensuring compliance with food safety regulations.

To maintain these high standards, we operate certified testing laboratories that monitor our technological processes and ensure compliance with production standards. All our laboratories are accredited by the Accreditation Center of the Republic of Moldova (MOLDAC), which is recognized internationally through agreements with the European Cooperation for Accreditation and the International Laboratory Accreditation Cooperation. Furthermore, our products undergo testing by the Central Laboratory for Testing Alcoholic and Non-Alcoholic Beverages and Canned Products, which issues conformity certificates for each batch of final products.

In line with these practices, we emphasize regular monitoring and testing for quality and safety, ensuring that all our products meet the highest standards of excellence. This comprehensive approach not only reinforces our commitment to producing safe and high-quality wines but also fosters consumer trust and satisfaction, ultimately contributing to our reputation as a responsible and ethical winery.

S4-5 – Targets related to managing impacts

Table 26. Consumers and end users targets

MDR-T Requirement	Target 1: Ensure 100% of wines with vintage 2024 and beyond sold in the EU include compliant e-labels with complete product information.	Target 2: Maintain ISO certifications across all wineries and ensure the absence of pesticide residues in final wine products, confirmed by Certificates of Harmlessness and Official Food Safety Registration Certificates.
Relationship to Policy Objectives	Aligns with EU regulations on transparency and consumer information (Regulations	The target aligns with Purcari Wineries Group's overarching policy to ensure compliance with health, safety, environmental, and food safety regulations, supporting the

	2021/2117, 1169/2011, 2023/3257) and supports informed consumer choices.	Group's strategic direction of delivering high-quality, safe products while minimizing environmental impact.
Defined Target Level	Compliance and transparency-focused target for reaching 100% product digital labeling.	Operational and compliance-based, target focused on quality assurance quantified as zero residues of pesticides in final products.
Scope of the Target	Applies to all wines produced on or after 8 th December 2023 for EU markets; includes Moldovan market, exports, and internal bottling practices.	Applies to all production facilities within Purcari Wineries Group: Vinaria Purcari, Vinaria Bostavan, Domeniile Cuza, Vinaria Bardar, and Crama Ceptura. Covers the full production cycle from grape processing to finished product.
Baseline Value and Base Year	Baseline year: 2023 (EU regulation applies from 8 December 2023).	Not explicitly quantified but implicitly based on initial certification acquisition and the standards required by ISO 9001:2015 and ISO 22000:2018. Baseline year: 2021
Period to Which the Target Applies	2024 onward	The target period extends to each certification's expiration date (2026–2028). Continuous monitoring and recertification
Indication of Milestones or Interim Targets	2023 vintage wines may qualify if production parameters (alcohol, acidity, sparkling pressure) are met by the end of production. Full compliance required for 2024 vintage and later.	Maintaining annual audits, compliance controls, issuance of Certificates of Harmlessness, and recertification cycles serve as interim milestones.
Description of Methodologies and Significant Assumptions	New process introduced to align with EU labeling regulations. Labeling adapted per product, size, and vintage. Compliance verified through internal testing and design adjustments. E-labels include product identification, ingredient list, nutritional values, packaging, and optional information. QR code placement and text, as well as energy values, must comply with EU standards.	Methodologies are based on the implementation of ISO-integrated systems, risk assessment, hazard analysis, and regular quality control testing. Assumptions include the ongoing applicability of international standards and internal testing protocols.
Target Related to Environmental Matters is Based on Conclusive Scientific Evidence	Not directly applicable – target is regulatory, and consumer-information focused, not environmental in nature.	Yes. The use of Certificates of Harmlessness (absence of pesticide residues) and pollutant emission authorizations is based on scientific testing and regulatory standards validated by accredited laboratories (e.g., MOLDAC, ILCA-MRA).
Disclosure of How Stakeholders Have Been Involved in Target Setting	Internal stakeholders (Product Development team) were responsible for integrating design, regulatory compliance, and technical functionality.	Indirectly, compliance with customer needs and legislative requirements (regulators, customers) influenced target formulation. No formal stakeholder engagement process was undertaken for this purpose.
Description of Performance Against Disclosed Target	Purcari has implemented compliant labeling processes and digital systems across applicable products. E-labels are functional, readable, and accessible via QR code, with comprehensive product data provided in line with regulatory demands.	Successful implementation and ongoing compliance with ISO certifications, confirmed by valid certifications across all entities, regular monitoring and testing, and official product conformity certificates.

Chapter 4. Business Conduct

Our commitments:

- ✓ Secure key positions and implement a robust succession plan to ensure leadership continuity and long-term growth potential
- ✓ Ensure transparent reporting, by providing regular, transparent reports on financial performance, sustainability efforts, and social impact to stakeholders and investors
- ✓ Maintain Board Diversity and independence to support effective oversight
- ✓ Ensure executive compensation and incentives are aligned with long-term company performance and shareholder value
- ✓ Abide to ethical business practices. Enforce a code of conduct that promotes ethical behavior, anti-corruption measures, and legal compliance throughout the organization

Table 27. Business conduct IROs overview

Corporate culture				
IRO Type	IRO label	Policies	Actions	Targets
Actual positive IMPACT	Ethical Corporate Culture	<ul style="list-style-type: none"> Code of Conduct Internal Regulation Governance Framework 	<ul style="list-style-type: none"> Develop and enforce a Code of Conduct and Internal Regulations to guide ethical behavior of employees (promoting fairness and integrity in decision-making processes). Integrate governance principles into all decision-making processes. <p><u>Management of ethical relationships with partners:</u></p> <ul style="list-style-type: none"> Encourage partnerships and supplier engagements based on mutual respect and shared values of ethical conduct. <p><u>Promoting fair practices:</u></p> <ul style="list-style-type: none"> Actively incorporate transparency and fairness in corporate operations, ensuring adherence to ethical business practices throughout the value chain. 	<ul style="list-style-type: none"> Train at least 90% of employees on the Code of Conduct by the end of 2024, focusing on Moldova, Romania, and Bulgaria operations. Conduct annual cross-departmental ethics compliance reviews starting in 2024, referencing internal procedures and control.
Actual positive IMPACT	Employee oriented corporate culture	<ul style="list-style-type: none"> Code of Conduct Internal Regulation Recruitment and Selection Policy 	<ul style="list-style-type: none"> Implement recruitment onboarding procedures emphasizing corporate values and ethics. Promoting an Inclusive Working environment by ensuring all employees are aware of the company's ethical 	<ul style="list-style-type: none"> Organize at least one internal campaign per year that would promote ethical guidelines and principles as well as emphasize the Group's corporate culture.

		<ul style="list-style-type: none"> • Development and Learning Policy • Internship Program Regulation 	<p>guidelines and principles, which contribute to fostering a strong corporate culture.</p> <ul style="list-style-type: none"> • Caring ethics and integrity campaigns initiatives to create a workplace where employees feel respected and valued, aligning with Purcari's goal of being an employer of choice. • Regular awareness campaigns to reinforce corporate values and encourage adherence to ethical practices in all business interactions. 	<ul style="list-style-type: none"> • Conduct annual employee satisfaction & ethics perception survey with a minimum 80% response rate starting 2025. • Ensure 90%+ of new hires complete onboarding on ethics and values within 30 days of start date.
Management of relationships with suppliers including payment practices				
IRO Type	IRO label	Policies	Actions	Targets
Actual positive IMPACT	Fair and ethical suppliers' management	<ul style="list-style-type: none"> • Supplier Code of Conduct (to be established) • Purchase & Procurement Policy • Contract Management Policy 	<ul style="list-style-type: none"> • Ensure all third-party partners uphold Purcari's ethical standards through the implementation of a unified Code. • Establish clear guidelines for ethical conduct and fair payment practices with suppliers, ensuring mutual accountability and trust. • Supplier Audits and Evaluations: conduct regular audits and evaluations to assess supplier compliance with ethical and payment standards. • Training and Support for Suppliers: provide training sessions to suppliers on ethical standards and support them in adhering to payment timelines and compliance requirements. 	<ul style="list-style-type: none"> • Synthesize and create a list of all Suppliers with which the Group works within all its premises by the end of 2025. • Establish a unified Supplier Code of Conduct. • Ensure 100% of new strategic suppliers sign the unified Code and receive ethics onboarding.
Actual positive IMPACT	Traceability along the supply chain	<ul style="list-style-type: none"> • Supplier Code of Conduct (to be established) • Procurement & Order Confirmation Procedures • Data Security & Backup Policies 	<ul style="list-style-type: none"> • Supply chain Monitoring by establishing clear expectations for suppliers regarding fair practices, ethical compliance, and transparency. • Implementing systems for tracking supplier compliance with ethical and operational standards, including payment timelines. • Ensuring high-risk suppliers obtain necessary certifications related to quality, traceability, and ethical practices. 	<ul style="list-style-type: none"> • Achieve 100% traceability for grapes sourced from Purcari – owned vineyards and strategic partners. • Ensure that the majority of high-risk suppliers (e.g. inputs, packaging) hold relevant certifications (ISO 22000, etc.).

Corruption and bribery				
IRO Type	IRO label	Policies	Actions	Targets
Actual positive IMPACT	Preventing and detecting corruption and bribery system	<ul style="list-style-type: none"> • Code of Conduct • Anti-Corruption Guidelines • Contract Management Policy • Whistleblower Reporting Procedure 	<ul style="list-style-type: none"> • Implementation of an Anti-Corruption Compliance Program: the program includes systematic procedures for the prevention, detection, and reporting of bribery and corruption incidents. • Organizing Regular Anti-Corruption Trainings: all employees in sensitive positions are trained on recognizing and preventing corruption risks, ensuring alignment with company policies. • Establishing an Infrastructure for Reporting Incidents: a confidential whistleblower system is available to report suspected incidents of bribery or corruption without fear of retaliation. • Internal Audits for Risk Detection: conducting internal audits to assess the effectiveness of anti-corruption measures and ensure compliance across all operations. 	<ul style="list-style-type: none"> • Ensure that 100% of employees in risk-sensitive functions are aware of the anti-corruption principles. • Maintain zero tolerance policy; maintain zero confirmed corruption incidents annually. • Conduct annual whistleblower mechanism awareness campaigns via intragroup announcements.
Entity specific – Exports Process Development				
IRO Type	IRO label	Policies	Actions	Targets
Actual positive IMPACT	Enhancement of Export Capabilities and Market Expansion	<ul style="list-style-type: none"> • Commercial Department Policies (Pricing per Market, Portfolio per Market – to be established) • Sales and Trade Budget Formation • Marketing Procedures (Product Launch, Trade Campaigns, Expo participation) 	<ul style="list-style-type: none"> • Optimizing Logistics Processes: streamline logistics to improve efficiency in delivering products to international markets. • Explore partnerships with logistics providers to enhance supply chain resilience. • Aligning with International Standards: ensure adherence to international trade laws and regulations to avoid legal and reputational risks. • Conduct training sessions for key teams to stay updated on export regulations. • Developing Global Trade Relationships: engage 	<ul style="list-style-type: none"> • Attend minimum 2 international trade fairs annually (e.g. ProWein, London Wine Fair). • Maintain 100% compliance with international trade documentation and labeling standards (e.g. EU, UK, China).

			with distributors and partners in new regions to establish a strong foothold. <ul style="list-style-type: none"> • Attend international trade fairs to promote Purcari's products and brand presence. 	
OPPORTUNITY	Exports Processes Development	<ul style="list-style-type: none"> • Order Reception, Delivery Planning Procedures • Commercial Pricing & Contracting Procedures • Marketing Product Launch and Communication Procedures 	<ul style="list-style-type: none"> • Diversifying External Markets: expand operations and market penetration in regions with higher purchasing power. • Strengthen existing distribution networks to ensure resilience against market volatility. • Leveraging Low-Cost Bases: maintain and enhance production efficiency in countries with lower cost bases, such as Moldova and Bulgaria, to sustain competitive pricing. • Mitigating Geopolitical Risks: shift focus to economically stable markets to offset potential losses in geopolitically sensitive areas. • Foster partnerships with regional distributors to safeguard supply chain stability. 	<ul style="list-style-type: none"> • Enter at least one new strategic export market. • Reduce sales exposure to high-risk geopolitical regions.

4.1. Governance

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

Purcari Group's business conduct is overseen by the Board of Directors (with its committees: Audit Committee, ESG Committee and Nominations and Remuneration Committee) and Executive Management Team, with direct involvement of the CEO/Deputy CEO, and CFO. These bodies ensure the alignment of ethical practices with business strategy and operations, including risk management, stakeholder engagement, and anti-corruption measures. Their responsibilities are grouped as follows:

Table 28. The responsibilities of the Board of directors regarding business conduct

Entity	Responsibilities	Oversight of Business Conduct
Board of Directors	Defines and monitors the Group's strategic direction through annual strategy sessions. Ensures long-term growth aligned with stakeholder expectations.	Provides oversight and ensures ethical business practices are embedded in strategy and operations. Reviews and aligns business objectives with

		opportunities, ensures long-term strategies.
Audit Committee	Evaluates major investments, mergers, acquisitions, and internal controls. Provides assurance on risk management systems.	Reviews compliance, risk mitigation and integrity-related KPIs. Provides recommendations based on risk assessments and progress updates.
Executive Management Team (led by the CEO/ Deputy CEO)	Executes strategy, manages operations across Moldova, Romania, and Bulgaria, and identifies risks and opportunities.	Implements business conduct principles at operational level. Ensures employee training on ethics and alignment with the Group's values. Ensures Code of Conduct adherence across departments. Evaluates potential risks and opportunities, collaborates with CFO.
Chief Executive Officer (CEO)/ Deputy CEO	Leads Executive Management and Group-wide execution of strategy. Integrates material risks and opportunities into Group operations.	Oversees ethical conduct, material risks and opportunities integration into business planning.
Chief Financial Officer (CFO)	Oversees financial planning and risk controls. Collaborates with CEO on risk mitigation.	Ensures financial integrity and anti-corruption controls. Integrates material risks and opportunities into company framework.

Board Composition and Independence

Purcari Wineries Group maintains a well-rounded Board structure that aligns with both Cyprus Cap. 113 and BVB Corporate Governance Code's emphasis on a balanced, skill-diverse and independent board.

The Board comprises a mix of executive and non-executive directors, with independent non-executive directors forming the majority, including the chairs of the Audit, ESG, and Nomination & Remuneration Committees. Each independent director submits a declaration of independence upon nomination, as required by the BVB Code.

Adhering to best practices, the Board regularly assesses potential conflicts of interest and overboarding. This ensures that directors dedicate sufficient time and maintain their objective oversight capacity.

Skills, Diversity & Evaluation

The Board's collective expertise spans finance, strategy, ESG, legal compliance, and regional markets (Moldova, Romania, Bulgaria). Diversity is intentionally fostered in tenure, gender, and professional background to support dynamic and informed decision-making. Supported by the Nomination & Remuneration Committee, the Board conducts annual evaluations to identify any capacity gaps and inform professional development plans.

In line with best governance practices and the provisions of the Cyprus Companies Law (Cap. 113) as well as Bucharest Stock Exchange's Corporate Governance Code, Purcari Wineries

Group maintains a structured and transparent information flow between its administrative, management, and supervisory bodies to ensure effective oversight of business conduct.

Information Flows and Reporting Frequency

- **Quarterly Reporting:** The Board of Directors and Audit Committee receive comprehensive quarterly reports prepared by the Executive Management Team and Internal Audit. These reports cover key performance indicators related to ethics and compliance, and any breaches or disciplinary actions taken. This approach ensures BVB's best practice of requiring the Board's internal regulation to "include terms of reference for ... fiduciary duties of directors to act on a fully informed basis."
- **Audit Committee Meetings:** In compliance with BVB Code Section B.1 – B.4, the Audit Committee – comprises independent and non-executive members – meets at least quarterly to review internal audit findings, conflicts of interest, and integrity of internal controls. It also submits periodic reports to the Board.
- **Monthly EMT Reviews:** The Executive Management Team, led by the CEO and CFO, convenes monthly to monitor operational and ethical indicators, including training, traceability audits, and conduct-related issues across regional operations (Moldova, Romania, Bulgaria). This supports effective, proactive management of conduct risks. The CEO and CFO collaborate to ensure that business conduct principles are integrated into financial decisions, supplier relationships, and internal controls.
- **Annual General Meeting (AGM):** Under Cap. 113, an AGM is held at least annually and no more than 15 months apart. During the AGM, the Board presents audited financial statements, directors' and auditors' reports, a summary of ethical conduct performance as well as key disclosures that align with BVB Code Section D.6, which mandates the presentation of internal controls and risk management systems to shareholders.
- **Statutory Filings and Recordkeeping:** As required by Cyprus law, the Group files its audited accounts and director's reports within 42 days of the AGM. Meeting minutes and statutory records are retained by the Company Secretary in line with Cap. 113. All board and committee meetings are properly documented, with minutes maintained by the Legal and Secretariat function, in accordance with the statutory recordkeeping obligations under Cypriot company law.

Compliance with the BVB Code Principles

The Board Regulation explicitly defines directors' fiduciary duties, including the requirements to act "on a fully informed basis". The Audit Committee, composed in line with BVB Section B.1 and chaired by an independent director, submits periodic reports to the Board.

Transparency is ensured through annual and quarterly disclosures, which support investor confidence and accountability.

Integration of Business Conduct into Decision-Making

Purcari ensures that ethical integrity is deeply integrated into its strategic, financial, and operational decisions, in accordance with its relevant governance codes.

Investment decisions – including M&A and supplier contracts – must undergo due diligence, assessing potential compliance, traceability, and anti-corruption risks, and are reviewed by the Audit Committee and approved by the Board. The Code of Conduct, Anti-Corruption Guidelines, and Supplier Code are mandatory for bids, contracts, and procurement tenders, ensuring ethical clauses are standard.

Monitoring & Training

All employees and partners receive onboarding; completion rates are tracked monthly and reported quarterly to the Board and Audit Committee.

The Audit Committee oversees compliance by reviewing internal audits and financial controls data at least every quarter.

Board Oversight & Accountability

Pursuant to BVB Section A.1, the Board actively shapes a corporate culture that promotes ethical values and accountability, making business conduct a key pillar when evaluating strategy, risk appetite, and policy.

Independent directors play a pivotal role in challenging business conduct decisions, upholding a “tone from the top” ethos.

Stakeholder Engagement

Compliance with BVB Code also ensures meaningful stakeholder communication: significant issues on business conduct are disclosed publicly and shared with shareholders, fostering trust and alignment with long-term value creation.

Expertise of administrative, management and supervisory bodies on business conduct matters

Purcari Wineries Group ensures its Board of Directors and Executive Management Team are equipped with the appropriate expertise to oversee business conduct matters such as corporate ethics, compliance and governance, in accordance with the BVB Corporate Governance Code, and Cap. 113 of Cyprus Companies Law.

- **Board of Directors**

The Board comprises a balanced mix of executive and non-executive directors, with independent members holding relevant backgrounds in law, finance, governance, compliance, and sustainability.

Table 29. Business conduct expertise of the Board of Directors

Name	Position	Appointment Info	Relevant Expertise
Victor Bostan	Founder. Executive Director	Since Listing	Founder of the Group with over 35 year of industry experience. As CEO, he is responsible for embedding ethical and compliant business practices throughout operations, with practical knowledge of managing corporate transformations ethically in high-risk markets.
Vasile Tofan	Chairman of the Board.	Since Listing, re-elected by the AGM on 26 May 2023	Holds an MBA from Harvard and a master's in public management from Erasmus University. With prior strategic experience at Philips and Monitor Group,

	Non-Executive Director		and current senior role at Horizon Capital, he brings significant expertise in governance, investment oversight, and ethical strategy development in consumer-facing industries.
Neil Gordon McGregor	Non-executive, independent Director	Since Listing, re-elected by the AGM on 22 May 2024	Chair of the Nominations and Remuneration Committee A UK-qualified solicitor with extensive legal practice in Romania and Bulgaria, and a background in corporate law, ethics and commercial litigation. He advises on regulatory compliance and governance and serves as Vice-Chair for Corporate Governance at the British Romanian Chamber of Commerce. Founder of McGregor & Partners.
Alexandru Filip	Executive Director	Appointed by the AGM on 22 May 2024	With nearly two decades of experience in management consulting at McKinsey & Company, where he also led the Digital Technology practice for Central Europe, Mr. Filip brings a strong background in risk assessment, ethical leadership, and digital governance.
Ana-Maria Mihaescu	Non-executive, Independent Director	Appointed by the AGM on 22 May 2024	Chair of the Audit Committee A certified INSEAD International Directors Program graduate with over 25 years of experience in financial governance. She currently serves on multiple Boards including as ESG Committee Chair at MedLife and Audit Committee Member at NEPI Rockcastle, bringing a strong ethical and sustainability-focused governance perspective.
Raluca Ioana Man	Non-executive, independent Director	Appointed by the AGM on 26 May 2023	Chair of the Environmental, Social and Governance Committee (ESG) With over 15 years in international business consulting and brand governance, she provides strategic expertise in ethical branding, reputation management, and stakeholder communication. Her roles in various women's leadership and governance networks further strengthen the Board's social governance competences,
Paula Catalina Banu	Non-executive, Independent Director	Appointed by the AGM on 26 May 2023	A qualified lawyer under the Cyprus Bar, with dual LL.M degrees focused on EU and international business law. Her legal expertise spans corporate governance, compliance, and regulatory frameworks, particularly within the pharmaceutical and healthcare sectors.

In line with BVB Code Sections A.1 and B.1 – B.4, all directors formally declare their independence and are selected based on their capability to contribute to ethical oversight. Board evaluations are conducted periodically to ensure governance effectiveness and address any gaps in expertise. The Board is supported by specialized committee – Audit, Nominations and Remuneration, and ESG – chaired by individuals with deep governance credentials, ensuring supervision of integrity-driven practices across the Group.

New directors undergo onboarding on corporate ethics and compliance frameworks, and the Board receives periodic updates from internal audit, compliance, and legal functions, particularly on business conduct issues such as anti-corruption controls, whistleblower protection, and supplier ethics.

- **Executive Management Team**

The Executive Management Team brings extensive operational and functional expertise crucial to embedding business conduct principles into the Group's day-to-day management and strategy execution:

Table 30. Business conduct expertise of the Executive Management Team

Name	Position	Relevant Expertise
Victor Bostan	Chief Executive Officer (CEO)	Founder and CEO since inception, with 35+ years in the wine industry. Leads embedding of ethical and compliant business practices across all operations.
Alexandru Filip	Deputy Chief Executive Officer	Joined in 2024; nearly 20 years in finance and management consulting with McKinsey & Company. Expertise in risk assessment, ethical leadership, and digital governance across international markets.
Bogdan Bayer	Chief Sales Officer	Joined in 2024; 10+ years international experience managing major brands (Heineken, Unilever) with strong leadership in sales ethics and customer relations.
Anatolie Belibov	Chief Financial Officer (CFO)	Joined in 2024; 17+ years in finance, accounting, internal controls, and financial transformations. Experience at KPMG, Nestlé, AkzoNobel with a focus on compliance and financial integrity.
Anton Fortunatov	Chief Information Officer	Joined in 2024; 20+ years in IT with McKinsey Digital. Drives digital innovation and governance to support ethical business practices.
Stefan Catrina	Strategy and Transformation Director	Joined in 2024; 10 years management consulting experience in strategic transformations including ethics and compliance integration.
Stefan Chiritescu	Chief Brand Officer	Joined in 2024; 23+ years in brand and communication strategy, including ethical marketing practices within the wine industry and FMCG sectors.
Nicolae Chiosa	Chief Production Officer	15+ years in production and oenology leadership within Purcari, ensuring operational compliance and quality standards.
Gheorghe Arpentin	Director of Development, Research & Innovation	40+ years in viticulture and oenology, leads sustainability and precision viticulture initiatives embedding environmental ethics into production.
Eugeniu Baltag	Investor Relations Director	Finance and controlling experience; ACCA member with expertise in transparent stakeholder communications and governance reporting.
Mihaela Rusu	Supply Chain Director	20+ years supply chain management experience with Lean Six Sigma certification, ensuring ethical supplier management and operational compliance
Oxana Lavuschina	Human Resources Director	20+ years in HR and organizational development, expert in ethical workplace culture and leadership development.

The Management Team operates under the leadership of the CEO (and Deputy CEO), driving the integration of the Group's Internal Regulation, Code of Conduct, anti-corruption measures, and ethical policies into operational and strategic processes. They receive continuous training and support from compliance, audit, and legal teams to maintain high standards of business conduct aligned with regulatory and investor expectations.

4.2. Impact, risk and opportunity management

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

To identify and assess the material impacts, risks and opportunities of the Group, we conducted a very detailed Double Materiality Assessment. We streamlined our assessment on each important area, including also the Business Conduct part. Key impacts include the risk of corruption along the value chain and the lack of business conduct policies, which could harm our business. We recognize the importance of fostering an ethical corporate culture and

implementing strong whistle-blower systems. Additionally, fair supplier management practices are essential for maintaining long-term relationships.

G1-1– Corporate culture and Business conduct policies and corporate culture

Purcari Wineries' core policies in place are mainly related to employee management at Group level, which are harmonized across the subsidiaries through the Group's Internal Regulation and Code of Conduct, applicable and aligned with relevant national legal frameworks: Romania's Law No. 31/1990 on Commercial Companies, Moldova's Law on Companies No. 113/2016, Bulgaria's Commercial Act (Promulgated SG No. 16/1991, last amended SG No. 63/2023). The Internal Regulation and Code apply not only to our employees, but to our main stakeholders as well, reinforcing ethical business behavior as a core element of our corporate culture.

Key policies in place

Group-Wide Governance & Business Conduct:

- Internal Regulation – defines employee conduct, rights and obligations, and internal procedures.
- Code of Conduct – provides guidance on ethical practices and reinforces the company's core values.
- Conflict of Interest Policy – policy meant to help the Group navigate ethical situations by providing clear guidance to employees and collaborators on maintaining high standards of integrity and impartiality in decision-making. It relies on the sound judgement of all involved and is applicable across all entities within the Group.
- Anti-bribery and anti-corruption Policy – policy that outlines the Group's stance against all forms of bribery and corruption, reinforcing our commitment to ethical and transparent business practices. It sets clear expectations for all employees and collaborators, promoting integrity across all operations. The policy serves as a guiding framework while daily business conduct is further supported by the responsible judgement and ethical awareness of everyone across the Purcari Wineries Group.
- Contract Management Policy (including the Internal Contract approval procedures) – Standardizes contract negotiation, review, and approval; applicable at all subsidiaries.

Human Resources & Employee Conduct

- Policy on Recruitment and Selection of Employees
- Policy on Employee benefits across the Group
- Policy on Learning and Development
- Policy on Internship Program Management
- Policy on car usage and fleet safety
- Video surveillance and security policy

IT & Digital Conduct

- End-User Computing Policy – regulates acceptable IT resource use.
- Cyber Security Policy – the policy highlights our commitment to protecting digital infrastructure, the information we handle, and it applies to all employees and collaborators.

- Email Security Policy – ensures safe and ethical communication practices. This policy is closely interlinked with the Cyber Security Policy and defines a clear system of protection of our corporate email systems at Group level.

Finance & Business Ethics

- Policy on Business Travel and Expense Reimbursement
- Procedure for Financial Documentation for Events
- OPEX & CAPEX Control Orders
- Commercial & Marketing Cost Recording Orders

Marketing & Sales Ethics

- Purchase & Procurement (PPO) Policy for Vendor/ Agency Selection
- Policy on Sample Preparation and Campaign Reporting
- Procedure for Sponsorship Evaluation and Trade Campaign Approvals
- Procedure for Participation in Trade Fairs/ Exhibitions
- Social Media Procedure – Content Approval and Q&A Matrix
- Policy on Trade Activity Budgeting and Price Setting per Market

Supply Chain & Commercial Conduct

- Procedure for Confirming Orders and Monthly Delivery Planning
- Procedure for Third-Party Contracting and New Project Pricing
- Supplier Code of Conduct (proposed as part of IRO actions)

These policies, form the foundation of Purcari Wineries Group's internal control environment and help manage key risks related to ethical breaches, reputational loss, and legal non-compliance. The Group's Corporate Governance and ESG Committees oversee policy updates, implementation, and employee training to ensure high standards of ethical conduct and transparent business culture.

Corporate culture at Purcari Group

At our Group level we define and develop a corporate culture focused on some strategic objectives, which clearly reflect our core values, such as motivation, integrity, efficiency and focusing on continuous improvement. An important part of our corporate culture is represented by transparent reporting, board diversity and employee continuous development. We consider these, as being important stream of promoting our core values, disclosing in this way important pillars of our corporate culture.

We actively promote ethical behavior and compliance through:

- Our Code of Conduct and Internal Regulation, which apply Group-wide across subsidiaries.
- A suite of targeted policies including Conflict of Interest, Anti-Bribery and Anti-Corruption, Cybersecurity, and Whistleblower Protection, all supporting a culture of trust and accountability.

- A focus on board diversity, transparent reporting, and executive alignment with long-term performance, in line with the BVB Corporate Governance Code and Cap. 113 of Cyprus Companies Law.

Promotion mechanisms include:

- Ethical onboarding for new hires.
- Annual ethics campaigns across regions.
- Awareness initiatives through communication channels and social dialogue.

Evaluation mechanisms include:

- Annual employee engagement surveys.
- Periodic culture and ethics perception reviews.
- KPI-based alignment assessments against strategic goals.
- Feedback from social dialogue platforms that enable open and honest communication.

Our Group emphasizes trust among employees, fostering an open and honest environment that encourages ethical behavior and inclusivity. Regular social dialogues with employees help identify concerns and collaboratively develop solutions, ensuring that the corporate culture remains aligned with the company's objectives.

Mechanisms for raising concerns

Purcari Wineries Group has implemented a formal mechanism for identifying, reporting, and investigating any misconduct, unethical behavior, or breaches of its Code of Conduct and other internal rules. These mechanisms are part of the Group's wider ethical and compliance framework.

Reporting Mechanisms:

- The Code of Regulations and Whistleblower Protection mechanism establish multiple channels for raising concerns, including anonymous reporting options.
- Employees, suppliers, and other stakeholders may report suspected breaches confidentially through dedicated email addresses, in-person declarations, or sealed written submissions.
- All procedures are compliant with the Moldovan Labour Code (Law No. 154/2003), Romanian Labour Code (Law No. 53/2003, updated 2023), and the Bulgarian Labour Code (SG No. 56/1986).

Handling of Reports:

- The Human Resources Department and, when relevant, the Legal or Compliance functions, are responsible for receiving and managing concerns.
- Reports are logged, assessed, and escalated based on severity, following clear internal investigation protocols.

Investigation Protocol:

- Investigations are conducted promptly, independently, and confidentially, ensuring due process and the protection of all parties involved.

- Findings are reviewed by senior management and may lead to disciplinary actions, structural improvements, or legal escalation if warranted.

These mechanisms reinforce a culture of transparency, integrity, and accountability, ensuring alignment with Purcari's ethical commitments and applicable legislation across all jurisdictions in which the Group operates.

Anti-corruption or anti-bribery policies consistent with United Nations Convention against Corruption

Purcari Wineries Group has adopted internal anti-bribery and anti-corruption policies that reflect our commitment to ethical business conduct. These are embedded in our Code of Conduct, Code of Regulations, and other supporting procedures applicable across the Group's operations in Moldova, Romania, and Bulgaria. While these policies address key risks and reflect national legislation—such as Law No. 78/2019 on Integrity and Anti-Corruption in Moldova, Law No. 78/2000 in Romania, and Bulgaria's Anti-Corruption Act and Criminal Code—they are not yet formally harmonized with all provisions of the United Nations Convention against Corruption (UNCAC).

Currently, no formal Group-wide roadmap has been adopted to achieve full compliance with UNCAC. However, the Group is considering progressive alignment by strengthening internal controls, extending training efforts, and further embedding whistleblowing mechanisms, in line with global good practices.

While efforts to enhance and harmonize these policies are ongoing, a specific timeline for transposing and fully aligning with UNCAC standards across all operations has not yet been established. The Group remains committed to monitoring legal developments and best practices and will update its policies accordingly when appropriate.

Safeguards for reporting irregularities

At Group level, we recognize the importance of a grievance procedure, because we want to be sure that all irregularities are resolved. The grievance mechanism at Purcari Wineries is established to guarantee that all communication channels remain open and welcoming, enabling employees to effectively communicate their concerns. It is designed to ensure that grievances are resolved in a timely and equitable manner by adopting a constructive problem-solving approach and implementing any necessary corrective measures. This mechanism is applicable to every employee within the Purcari Wineries Group, with its primary aim being to provide resources and guidance for employees to address grievances as early as possible.

The goals of the Grievance Procedure can only be fulfilled if its functions are utilized properly and effectively. In this context, Purcari Wineries is committed to the following principles:

- Ensuring that employees are aware of their right to express grievances.
- Creating an environment where employees can voice their concerns without fear of retaliation, intimidation, or any adverse effects on their employment status.
- Encouraging employees to engage with the grievance procedure while also cautioning against the misuse of the system through false claims.

- Ensuring that sensitive grievances are managed with discretion, maintaining the confidentiality of all related information.

By adhering to these principles, Purcari Wineries aims to foster a supportive workplace culture where employees feel empowered to raise their concerns and seek resolution. Additionally, the system guarantees protection from retaliation in accordance with EU Whistleblower Directive (2019/1937) transposed into national laws, including Romanian Law No. 571/2022 on whistleblower protection, Moldovan Law No. 17/2021 on whistleblower protection, and Bulgaria's Whistleblower Protection Act (adopted 2023).

Protection of whistle-blowers

Purcari Wineries operates in accordance with applicable national legislation concerning whistleblower protection in the jurisdictions where it is active—namely, Law No. 985/2002 on the Code of Ethics for Public Servants and Law No. 132/2023 on Whistleblower Protection in the Republic of Moldova; Law No. 361/2022 in Romania (transposing EU Directive 2019/1937 on the protection of persons who report breaches of Union law); and the Bulgarian Whistleblower Protection Act (effective as of 2023, also transposing Directive 2019/1937).

While the Group currently ensures that employees have access to grievance mechanisms for raising concerns confidentially and without fear of retaliation, a formal, Group-wide whistleblower protection policy fully aligned with international and EU standards is still under development. The policy will aim to harmonize practices across all jurisdictions where Purcari operates, but no specific implementation date has been confirmed at this time. The Group continues to monitor regulatory developments and will update its internal frameworks accordingly.

At this stage, the Group has not established a clear timetable for the adoption of formal whistleblower protection policies aligned with international and EU standards. While Purcari Wineries complies with the applicable national legislation in Moldova, Romania, and Bulgaria, the timeline for transposing these requirements into a unified Group-wide internal policy remains undetermined. The matter is under consideration, but no definitive schedule for implementation has been set in the near term.

Business conduct incidents

Purcari Wineries Group is committed to investigating all reported incidents related to business conduct violations promptly, independently, and objectively. The Group ensures that all such cases are handled with transparency, confidentiality, and impartiality, in line with the internal Code of Regulations and applicable national legislation in each jurisdiction where it operates.

In Moldova, investigations are conducted in accordance with the Labour Code of the Republic of Moldova (No. 154/2003), particularly Articles 10 and 207–210, which govern the protection of employee rights, internal disciplinary procedures, and fair treatment in case of workplace conflicts or violations.

In Romania, the Group follows the provisions of Law No. 53/2003 – the Labour Code, especially Articles 247–252, which regulate the process of disciplinary investigation, the rights of the parties involved, and procedural fairness. Additionally, Law No. 361/2022 on whistleblower protection (which transposes Directive (EU) 2019/1937) provides guiding principles on handling reports concerning breaches of ethical or legal obligations.

In Bulgaria, the investigations are carried out in accordance with the Labour Code (SG No. 26/1986, last amended) and The Law on Protection of Persons Reporting Information or Publicly Disclosing Information on Breaches (SG No. 11/2023), which implements EU whistleblower protections. These laws ensure that concerns are addressed confidentially and without retaliation and require employers to establish internal channels for fair and impartial inquiry.

The Human Resources Department at Group and subsidiary level is responsible for overseeing the review process and ensures that the findings are based on documented evidence and conducted in full compliance with internal regulations and applicable law. Where necessary, external legal counsel may be involved to preserve independence and reinforce the objectivity of the procedure.

We carry and conduct programs for all our employees, focusing on business conduct, labour protection and health and safety at the workplace. Our Group's training initiatives aim to enhance employees' understanding of ethical practices and compliance with the company's Code of Regulations.

At-risk functions in respect of corruption and bribery

Functions with the highest exposure to corruption risks include:

- Procurement and supply chain management.
- Sales and marketing departments.
- Financial reporting and treasury operations.
- Risk mitigation measures, including strict controls and oversight, are applied in these areas.

G1-2 – Management of relationships with suppliers

Purcari Wineries Group is aware of the critical importance of timely payments, particularly for small and medium-sized enterprises (SMEs) within its supply chain. While there is currently no formal policy adopted at Group level specifically targeting late payment prevention, in practice, the Group respects and aligns with best business practices and national legislation in Moldova, Romania, and Bulgaria regarding payment terms and commercial fairness (e.g., Directive 2011/7/EU on combating late payment, as transposed in Romania through Law no. 72/2013 and reflected in similar Moldovan and Bulgarian frameworks).

Operational procedures ensure payments are processed promptly and contractual terms are respected.

The Group fosters long-term, ethical, and mutually beneficial relationships with its suppliers, guided by principles of quality, trust, and responsible business conduct. While a formal procurement policy is not yet in place, especially one with a main focus on sustainability, the Group has initiated the development of internal procedures and protocols that will incorporate all necessary criteria into supplier selection, onboarding, and performance monitoring.

Following the Double Materiality Assessment, supply chain risks – particularly regarding environmental impacts, labor standards, and traceability – were identified as material to the Group's operations. As a result, Purcari will progressively integrate sustainability performance into its supplier management practices.

The Group's ongoing efforts include:

- Mapping key suppliers across all operations by the end of 2025.
- Defining and enforcing a Supplier Code of Conduct that outlines expectations on fair practices, ethical behaviour, and sustainability standards.
- Preparing a unified supplier evaluation mechanism that includes ESG compliance and transparency.
- Strengthening due diligence, particularly for high-risk categories such as packaging, inputs, and outsourced services.

These initiatives are supported by internal collaboration between procurement, legal, logistics, financial teams, reflecting the Group's commitment to aligning supply chain decisions with responsible business conduct and long-term resilience.

At present, Purcari Wineries Group does not apply mandatory social or environmental criteria in the formal selection of supply-side contractual partners. However, following the Group's Double materiality Assessment, the integration of such criteria has been recognized as a key area of development.

As a result, the Group's administration, in coordination with the procurement and logistics team, under the guidance of the ESG Committee, will be evaluating how ESG considerations can be embedded into supplier selection and contracting processes going forward. These criteria are expected to be reflected in the Supplier Code of Conduct and related procurement policies under development.

G1-3 – Prevention and detection of corruption and bribery

Purcari Wineries has implemented an Anti-bribery and Ant-corruption Policy that sets clear behavioural standard across all subsidiaries and operations. The policy reflects national legal frameworks, including:

- Law No. 78/2000 in Romania on corruption prevention and punishment;
- Law No. 78/2019 in Moldova on integrity and anti-corruption;
- The Bulgarian Anti-Corruption Act and related provisions under the Criminal Code.

The policy applies to all employees, managers, and collaborators and is embedded into onboarding and internal training programs.

To prevent and detect incidents, the Group has also established:

- Internal control procedures and segregation of duties within finance and procurement functions;
- A confidential reporting mechanism managed by the Human Resources and Compliance teams;
- Whistleblower protection aligned with local labor legislation (Romania Labor Code Law No. 53/2003, Moldovan Labor Code Law No. 154/2003, and Bulgarian Labour Code SG No. 56/1986).

Investigation

Allegations are investigated promptly, maintaining confidentiality and impartiality, and finding are reported to senior management for corrective action. The Group aims to continuously enhance its integrity systems in line with evolving local and EU regulations.

Purcari Wineries Group does not currently have a separate investigating committee exclusively tasked with handling corruption or bribery cases. However, investigations are conducted through the Human Resources or Internal Audit, both of which operate independently from the operational management involved in prevention and detection activities.

These departments follow the standard procedures established under national legislation in each country where the Group operates—namely:

- Moldova: Law No. 154/2003 (Labour Code),
- Romania: Law No. 53/2003 (Labour Code) and Law No. 78/2000,
- Bulgaria: Labour Code and Anti-Corruption and Forfeiture of Assets Act.

This ensures that allegations are reviewed impartially, confidentially, and in accordance with applicable legal norms.

Reporting outcomes

The process of reporting outcomes of internal investigations related to corruption or bribery follows general legal requirements under national labour and anti-corruption laws applicable in Moldova, Romania, and Bulgaria. While no standalone internal protocol is currently in place, the following process applies:

- Investigations initiated through whistleblower channels or internal reporting are conducted by the Human Resources or Internal Audit departments.
- Upon conclusion, a summary report is prepared, outlining the findings, measures taken, and recommended disciplinary or preventive actions.
- In Moldova, the Labour Code (Law No. 154/2003) and Law No. 82/2017 on whistleblower protection require that relevant outcomes, especially involving ethical breaches or misconduct, be escalated to senior management and supervisory bodies when applicable.
- In Romania, Law No. 361/2022 on whistleblower protection mandates that companies with over 50 employees implement internal reporting and follow-up procedures, including informing designated governance structures.
- In Bulgaria, the Labour Code and the Law on Counteracting Corruption require outcomes to be documented and submitted to competent bodies or governing entities when risk to the enterprise or violations of law are identified.

Although a formal internal policy for reporting outcomes to the Board or Supervisory Committee is in preparation, current practice ensures that significant cases are reported by the Internal Audit or HR teams to senior management and—where required—Board

Committees (e.g., Audit Committee), particularly when reputational, legal, or compliance issues are involved.

Policy communication

Purcari Wineries Group ensures that all policies related to business conduct, ethics, and anti-corruption are effectively communicated to employees and relevant stakeholders through a structured, multi-channel approach. Key policies—including the Code of Conduct, Anti-Bribery and Anti-Corruption Policy, Conflict of Interest Policy, and cybersecurity-related procedures—are embedded in the Group's Internal Regulation, which is made accessible across all subsidiaries operating in Moldova, Romania, and Bulgaria.

New hires are introduced to these policies during onboarding sessions, which include training on corporate ethics, compliance expectations, and the reporting mechanisms available. Existing employees receive regular reminders via internal communications, email briefings, and compliance campaigns managed by HR and legal teams. Updated versions of policies are distributed electronically, and dedicated sessions are held when substantial changes are introduced.

Additionally, compliance officers and department heads act as local policy ambassadors, ensuring that business units interpret and apply the rules consistently. This decentralized yet coordinated method allows the Group to promote awareness, build an ethical culture, and prevent misconduct across its operations.

Anti-corruption training

At present, Purcari Wineries Group does not have dedicated anti-corruption or anti-bribery training programs formally structured across its operations. Instead, the Group relies on national legislation and regulatory frameworks in Moldova, Romania, and Bulgaria, which require general compliance with anti-corruption laws. Awareness is promoted through internal communication campaigns, onboarding sessions, and reminders included in the Group's Internal Regulation and Code of Conduct. Relevant employees are informed about acceptable conduct, whistleblower mechanisms, and legal responsibilities, though no standardized or periodic training modules are yet in place.

No precise percentage coverage can be reported for a formal training programme specifically targeting functions-at-risk for corruption or bribery. Following the recent Double Materiality Assessment, the Group intends to evaluate and expand coverage of at-risk functions in future training initiatives.

As for specialised training programmes dedicated to members of the Board of Directors or Executive Management Team, there are currently none that focus solely on anti-corruption as a standalone subject. However, in accordance with the BVB Code of Corporate Governance and Cap. 113 of the Cyprus Companies Law, the Board and management bodies receive the necessary formal training and continuous updates required to discharge their duties responsibly—this includes onboarding sessions, corporate governance updates, and periodic briefings on compliance, ethics, and risk matters.

While these trainings and briefings cover broader aspects of good governance, ethical conduct, and integrity, they do not yet constitute a distinct anti-bribery or anti-corruption curriculum. The Group's directors and senior managers are kept informed of key

developments through regular interactions with internal audit, compliance, and legal functions, as well as updates on relevant national legislation in Moldova, Romania, and Bulgaria.

Following the findings of the recent Double Materiality Assessment, the Group acknowledges the importance of strengthening this area further and is assessing opportunities to expand targeted anti-corruption awareness initiatives for its highest governance bodies.

4.3. Entity specific – Exports Process Development

Purcari Wineries Group views export expansion as a cornerstone of its long-term growth strategy, firmly embedded in the “2x by 200” vision—doubling the business by 2028 through a focus on scaling premium wine brands across New Europe and beyond. The strategy entails both production and commercial expansion, leveraging economies of scale, operational excellence, and strategic market positioning.

During our Double Materiality Assessment, enhancing export capabilities and developing the full export process emerged as both a material opportunity and a driver of actual positive impact. We recognize that expanding exports supports sustainable growth, strengthens brand equity, and reduces exposure to volatile domestic markets.

To support this opportunity, the Group has adopted a multidimensional approach:

- **Market Penetration** in countries with higher purchasing power and stable regulatory frameworks.
- **Operational Efficiency** by enhancing production and cost structures in Moldova and Bulgaria.
- **Resilience Building** by shifting focus from geopolitically sensitive regions to economically stable export markets.
- **Strategic Partnerships** with local and regional distributors to safeguard supply chain continuity and accelerate market entry.
- **Reputation Building** through consistent product quality, heritage storytelling, and premium positioning.

This strategy was presented during our 2024 Investor Day and is fully integrated into our mid- and long-term business planning. Progress is monitored through clear performance indicators:

Table 31. Export Development Targets

Indicator	Target by 2028
Local Wineries	2–3 production platforms with capacity over 100,000 bottles/year
Vineyard Ownership	Expansion in high-quality plots focusing on indigenous grape varieties
Brand Positioning	Development of niche and premium wine offerings
Scalability Potential	Sites with infrastructure for vineyard and production growth

We believe that building a diversified export footprint not only enhances financial resilience but also aligns with our values of sustainability, innovation, and long-term stakeholder value. The Group continues to monitor external risks (e.g. logistics, regulation, climate volatility) and integrates feedback into its export planning cycles.

Annexes

Annex 1. IRO-2 – Disclosure Requirements in ESRS covered by the sustainability statement

ESRS Index

List of material Disclosure Requirements (DR)	Section within the report	Page
ESRS 2 General Disclosures		
BP-1 – General basis for preparation of sustainability statements	ESRS 2	5
BP-2 – Disclosures in relation to specific circumstances	ESRS 2	5
GOV-1 – The role of the administrative, management, and supervisory bodies	ESRS 2, G1	6-11
GOV-2 – Information provided to, and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies	ESRS 2	12-14
GOV-3 – Integration of sustainability-related performance in incentive schemes	ESRS 2	14-15
GOV-4 – Statement on due diligence	ESRS 2	15
GOV-5 – Risk management and internal controls over sustainability reporting	ESRS 2	16
SBM-1 – Strategy, business model, and value chain	ESRS 2	17-23
SBM-2 – Interests and views of stakeholders	ESRS 2, S1, S4	23-26
SBM-3 – Material impacts, risks, and opportunities and their interaction with strategy and business model	ESRS 2, E1	26-30
IRO-1 - Description of the processes process to identify and assess material impacts, risks and opportunities	ESRS 2	31-33
IRO-2 – DRs in ESRS covered by the undertaking's sustainability statement	ESRS 2, Annexes	33
E1 Climate Change		
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SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	E1	35-38
E1-2 – Policies related to climate change mitigation and adaptation	E1	38-41
E1-3 – Actions and resources in relation to climate change policies	E1	41-43
E1-4 – Targets related to climate change mitigation and adaptation	E1	43-45
E1-5 – Energy consumption and mix	E1	45-47

E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	E1	47-50
E3 Water and Marine Resources		
IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	ESRS 2, E3	51-53
E3-1 – Policies related to water and marine resources	E3	53-54
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E3-4 – Water consumption	E3	57-58
E4 Resource use and Circular economy		
E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model	E4	59-60
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S1 Own Workforce		
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S1-2 – Processes for engaging with own workforce and workers' representatives about impacts	S1	71
S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	S1	71-72
S1-4 – Taking action on material impacts on own workforce	S1	72-74
S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S1	74-76
S1-6 – Characteristics of the undertaking's employees	S1	76
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S4 Consumers and End Users		
SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	S4	78-79
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G1 Business Conduct		
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IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	G1	93-94
G1-1– Business conduct policies and corporate culture	G1	94-99
G1-2 – Management of relationships with suppliers	G1	99-100
G1-3 – Prevention and detection of corruption and bribery	G1	100-103
Entity specific – Exports Process Development	G1	103

List of data points that derive from other EU legislation

Related datapoint	SFDR ¹	Pillar 3 ²	Benchmark Regulation ³	EU Climate Law ⁴	Page
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	x		x		7
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			x		6
ESRS 2 GOV-4 Statement on due diligence paragraph 30	x				15
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	x	x	x		Not applicable
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	x		x		Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	x		x		Not applicable
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			x		Not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				x	35

ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		x	x		Not material
ESRS E1-4GHG emission reduction targets paragraph 34	x	x	x		43
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	x				46
ESRS E1-5 Energy consumption and mix paragraph 37	x				46
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	x				46
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	x	x	x		47
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	x	x	x		48
ESRS E1-7 GHG removals and carbon credits paragraph 56				x	Not material
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			x		Phased-in
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		x			Phased-in
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)		x			Phased-in
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			x		Phased-in
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	x				Not material
ESRS E3-1 Water and marine resources paragraph 9	x				53
ESRS E3-1 Dedicated policy paragraph 13	x				54
ESRS E3-1 Sustainable oceans and seas paragraph 14	x				Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	x				57

ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	x				57
ESRS 2- SBM 3 - E4 paragraph 16 (a) i	x				59
ESRS 2- SBM 3 - E4 paragraph 16 (b)	x				59
ESRS 2- SBM 3 - E4 paragraph 16 (c)	x				59
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	x				60
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	x				Not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	x				Not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	x				Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	x				Not material
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	x				Not material
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	x				Not material
ESRS S1-1 Human rights policy commitments paragraph 20	x				67
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			x		Not material
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	x				Not material
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	x				68
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	x				72
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	x		x		Phased-in
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	x				Phased-in
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	x		x		Not material

ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	x				Not material
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	x				Not material
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	x		x		Not material
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	x				Not material
ESRS S2-1 Human rights policy commitments paragraph 17	x				Not material
ESRS S2-1 Policies related to value chain workers paragraph 18	x				Not material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	x		x		Not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			x		Not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	x				Not material
ESRS S3-1 Human rights policy commitments paragraph 16	x				Not material
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	x		x		Not material
ESRS S3-4 Human rights issues and incidents paragraph 36	x				Not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	x				79-80
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	x		x		Not material
ESRS S4-4 Human rights issues and incidents paragraph 35	x				Not material
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	x				97
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	x				97

ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	x		x		Not material
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	x				Not material

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