LOTUS BAKERIES UN GLOBAL COMPACT

COMMUNICATION ON PROGRESS 2021



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01. COMMITMENT OF THE CEO

H.E. António Guterres Secretary-General Ms. S. Ojiambo Executive Director United Nations New York, NY 10017 USA

Dear Ms. Ojiambo, Dear Mr. Guterres, Dear Stakeholders,

I am pleased to confirm that Lotus Bakeries Group reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

The world is still recovering from the Covid-19 pandemic. At the same time, conflicts in different parts of the world are causing geopolitical and economic turmoil. Meanwhile, the challenges surrounding climate change persist.

In order to meet the Paris Agreement by 2050 we need to act urgently and cooperate with others in search of zero-carbon solutions. Likewise, the call for an inclusive and fair society has only grown and so had our ambition to do our part.

Lotus Bakeries is a strong supporter of the United Nations Global Compact Ten Principles. We recognize that business has an important role to play to create a prosperous future for generations to come.

Our 'Care for Today, Respect for Tomorrow' sustainability strategy is an integral part of our vision and our business strategy which rests on three pillars.

We are committed to protecting our **environment** and combating global warming. We aim to reduce our ecological footprint in everything we do. We put this commitment into practice by promising only to use recyclable packaging for all our brands by 2025.

Our 12 factories are already carbon neutral and in 2022 we will commit to endorse the Science Based Target initiative (SBTi).

Our recruitment policy is designed to attract a diverse and talented group of people who, just like us, care about the TOP values: Team Spirit, Open Dialogue and Passion. We aim for long-term employment and offer our **employees** a pleasant, challenging, inspiring and safe work environment. We use development, constant challenge and training to ensure our employees feel at home at Lotus Bakeries and that they develop themselves to ensure that accrued know-how is permanently retained in the business.

We also actively accept our social responsibility towards the **community** we operate in. By implementing our internal Code of Conduct and the Supplier Code of Conduct, we guarantee ethical business practices throughout the organisation. With our Foundation for Education we contribute to prospects for future generations through carefully chosen education and training projects.

In our annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours

Jan Boone

CEO Lotus Bakeries

02. DESCRIPTION OF PRACTICAL ACTIONS AND MEASUREMENT OF OUTCOME

IMPLEMENTING THE TEN PRINCIPLES INTO STRATEGIES & OPERATIONS

| UN GC Principles | Lotus Bakeries approach | Where to find more info | Reference to GRI Standards |
|---|---|---|--|
| Implementing the Ten Principles into Strategies & Operations | Lotus Bakeries' commitment to responsible, ethical and sustainable business is embedded in its sustainability programme 'Care for Today, Respect for Tomorrow'. This programme exists more than 10 years. | Lotus Bakeries Annual Report 2021, pp. 78 – 87 | GRI 102-18 GRI 102-20 GRI 102-31 GRI 102-32 |
| | Lotus Bakeries' sustainability strategy rests on three pillars: our environment, our employees and our community. | Annual Report 2021 – ESG | |
| | Lotus Bakeries 'Care for Today, Respect for Tomorrow' sustainability strategy is the responsibility of the Executive Committee (EXCO). | Compilation & GRI Report | |
| | The EXCO is led by our Chief Executive Officer and comprises the CEO, CEO Natural Foods, CFO, COO and Corporate Director Quality, Procurement and R&D. | | |
| | The EXCO reports regularly to the Board of Directors on the different priorities and actions. | | |

HUMAN RIGHTS

| UN GC Principles | Lotus Bakeries approach | Where to find more info | Reference to GRI Standards |
|---|--|--------------------------------------|-------------------------------|
| Principle 1: Businesses | Lotus Bakeries promotes human rights in its own organisation by acting in accordance with its code of conduct. | Lotus Bakeries Code of Conduct | GRI 102-8 GRI 405-1 |
| should support and respect the protection of internationally | to the Lotus Bakeries is committed to act with integrity, honesty, fairness and in full compliance with applicable laws, rules and | Lotus Bakeries Annual Report | |
| proclaimed human rights | Lotus Bakeries aims to create a workplace where people are treated fairly and provided with a healthy and safe working environment, enabling each and every individual to reach their | 2021, pp. 104 – 105 | |
| | full potential. | Lotus Bakeries GRI Report | |
| | By signing the Code of Conduct each employee of Lotus Bakeries commits itself to respect the human rights of colleagues and all other people with whom they come in contact and to value diversity that comes in many dimensions (race, ethnicity, gender, age, background). | | |
| | Lotus Bakeries' employees commit to treat people with dignity, honesty, fairness and respect and abstain from any form of discrimination, harassment, verbal or physical abuse. | | |

UN GC Principles Lotus Bakeries approach Where to find Reference to more info **GRI Standards** Implementing the Code of Conduct started mid 2020 and currently 99,8% of the employees have signed the Code of Conduct. Lotus Bakeries has a good gender balance in the different countries where it operates. Overall, the male (48%) and female (52%) population is in balance and this balance is reflected in the workforce in the different countries. Lotus Bakeries' internal workforce has a good spread over the different age categories representing different levels of experience, working together in Teams, with Open dialogue and Passion (TOP-values). Lotus Bakeries Principle 2: Lotus Bakeries promotes human rights in its relationships Businesses should with suppliers by requesting its key suppliers to sign the Lotus Supplier Code of make sure that they Bakeries Supplier Code of Conduct Conduct are not complicit The supplier is requested to confirm its compliance with Lotus Bakeries in human rights all laws and regulations relevant to its business including, abuses Annual Report amongst others, the United Nations Global Compact's Ten 2021, p. 114 Principles and the Universal Declaration of Human Rights. By signing Lotus Bakeries Supplier Code of Conduct the Supplier commits to respect the human rights of people, to

treat people with dignity, honesty, fairness and respect, to abstain from any form of discrimination, harassment, verbal or

The implementation of the Supplier Code of Conduct started mid 2020 and currently 90,1% of Lotus Bakeries' key suppliers have signed the Supplier Code of Conduct.

physical abuse.

LABOUR

| UN GC Principles | Lotus Bakeries approach | Where to find more info | Reference to GRI Standards |
|---|---|---|-------------------------------|
| Principle 3: Businesses should uphold the freedom | Both the Lotus Bakeries Code of Conduct and the Lotus Bakeries Supplier Code of Conduct explicitly state that all workers must have the freedom of association and a right to | Lotus Bakeries Code of Conduct | GRI 407-1 |
| of association and the effective recognition of the right to collective | collective bargaining. | Lotus Bakeries Supplier Code of Conduct | |
| bargaining | | Annual Report 2021, p. 117 | |
| Principle 4: The elimination of all forms of forced | Both the Lotus Bakeries Code of Conduct and the Lotus Bakeries Supplier Code of Conduct explicitly state that work should be conducted on a voluntary basis and on the basis of | Lotus Bakeries Code of Conduct | GRI 409-1 |
| and compulsory labour | documented terms of employment. Employees at Lotus Bakeries are paid fair wages, in line with the applicable laws and appropriate prevailing industry standards. | Lotus Bakeries Supplier Code of Conduct | |
| | Employees have the right to elect representatives. | Annual Report 2021, p. 117 | |
| Principle 5: The effective abolition of child | Both the Lotus Bakeries Code of Conduct and the Lotus Bakeries Supplier Code of Conduct expressly prohibit child labour. | Lotus Bakeries Code of Conduct | GRI 408-1 |
| labour | All workers should be of an appropriate age. | Lotus Bakeries | |
| | Children's right to childhood & education should be respected | Supplier Code of Conduct | |
| | at all times and no child labour is accepted (as defined by the ILO International Labour Standards on Child Labour). | Annual Report 2021, p. 117 | |
| Principle 6: The elimination | Lotus Bakeries is committed to respect the dignity and human rights of all people and values diversity. | Lotus Bakeries Code of | GRI 405-1 |
| of discrimination in respect of employment and | Diversity comes in many dimensions, such as race, ethnicity, gender, age, etc. | Conduct Lotus Bakeries Supplier Code of | |
| occupation | Lotus Bakeries is committed to treat people with dignity, honesty, fairness and respect and to abstain from any form of discrimination, harassment, verbal or physical abuse. | Conduct | |
| | Lotus Bakeries prohibits retaliation against individuals who report problems in good faith and is committed to investigate such reported problems and will take corrective actions if the situation justifies it. | | |

| UN GC Principles | Lotus Bakeries approach | Where to find more info | Reference to GRI Standards |
|--|---|---|--|
| Principle 7: Businesses | Lotus Bakeries' objective is to make its products more and more sustainable. | Lotus Bakeries Code of | GRI 102-11 GRI 302-1 |
| should support a precautionary approach to environmental | Lotus Bakeries is aware of the negative impact certain crops can have on the environment and on the communities living in | Conduct Lotus Bakeries Supplier Code of | GRI 305-1 GRI 305-2 GRI 305-5 GRI 308-2 |
| challenges | | Conduct Lotus Bakeries | |
| | It is important to Lotus Bakeries that the palm oil it uses in its products has been produced sustainably and does not | Palm Oil Policy | |
| | contribute to deforestation or the destruction of vulnerable areas. | Annual Report 2021, pp. 88 - 103 | |
| | Lotus Bakeries therefore selects its key palm oil suppliers carefully on the basis of the NDPE principle (No Deforestation, No Peat, No Exploitation) in its purchasing standards. | pp. 33 | |
| | At the end of 2021, 90% of key palm oil suppliers had endorsed Lotus Bakeries' palm oil policy. | | |
| | Lotus Bakeries is a member of the RSPO (Roundtable on Sustainable Palm Oil) and the Belgian Alliance for Sustainable Palm Oil and is committed to purchasing only sustainable palm oil. | | |
| | Therefore 100% of palm oil sourced by Lotus Bakeries is RSPO certified. | | |
| | All Lotus Bakeries' sites that use palm oil also obtained the RSPO certificate. | | |
| | The cocoa butter and cocoa mass used in the Lotus®Biscoff® Chocolate is 100% certified by the Rainforest Alliance. | | |
| | Lotus Bakeries is also a member of the RTRS (Round Table on Responsible Soy Association – Switzerland). | | |
| | All electricity used by Lotus Bakeries comes from own production from renewable sources or is offset with certificates. The CO_2 e-emission from energy used have been fully offset. | | |
| | Lotus Bakeries is contributing to the fight against global warming. | | |
| | The calculation of its carbon footprint is done by an external party using the Bilan Carbone® methodology. | | |
| | All GHG emissions are included. | | |
| | The total scope 1 and 2 emissions have been offset with certificates and Lotus Bakeries acquired for 2021 the CO_2 -Neutral Certificate. | | |
| | Acknowledging that global warming should be kept below 1,5°C, Lotus Bakeries will subscribe the SBTi in 2022. | | |

| UN GC Principles | Lotus Bakeries approach | Where to find more info | Reference to GRI Standards |
|---|---|--|-------------------------------|
| Principle 8: Businesses should undertake initiatives to promote greater | By requesting its key suppliers of finished products, raw materials, packaging and machinery to sign the Supplier Code of Conduct, Lotus Bakeries promotes a greater environmental responsibility. | Lotus Bakeries Supplier Code of Conduct Annual Report | GRI 102-12 GRI 102-13 |
| environmental responsibility | In March 2021 Lotus Bakeries signed the UN Global Compact. | 2021, p. 86 Annual Report | |
| | Lotus Bakeries is an active member of different organisations and/or roundtables involving environmental topics. | 2021, p. 96 | |
| | In 2021 Lotus Bakeries launched an initiative to inform its consumers about the recyclability of its packaging. Lotus Bakeries hereby wants to increase the awareness of consumers to sort our packaging correctly so that it can actually be recycled. | | |
| Principle 9: Businesses should | Lotus Bakeries believes it is vitally important to evolve into a circular economy. | Annual Report 2021, | GRI 301-2 |
| encourage the development and diffusion of environmentally friendly | Lotus Bakeries is determined to invest in closing the circle and intends to continue research into how responsible purchasing, recycled content, consumer awareness, sorting guidance, innovative solutions etc. can help us achieve this goal. | рр. 90 - 95 | |
| technologies | Lotus Bakeries has the ambition to have all the packaging of all its brands 100% recyclable by 2025. | | |
| | The recyclability of packaging starts with its design. | | |
| | Lotus Bakeries is exploring sustainable and innovative packaging materials to increase the recyclability of our packaging and at the same time support the recycling process while safeguarding the highest standards of food safety. | | |
| | Lotus Bakeries is an active member of Ceflex. | | |
| | As per December 31, 2021, 97,1% of the packaging of all Lotus Bakeries' brands was recyclable. | | |
| | On average Lotus Bakeries had 75% recycled content in all the cardboard packaging of its brands and 76% of the cardboard packaging of its brands is currently certified with the guarantee that the products come from sustainably managed forests. | | |

ANTI-CORRUPTION

| UN GC Principles | Lotus Bakeries approach | Where to find more info | Reference to GRI Standards |
|---|---|---|-------------------------------|
| Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery | Lotus Bakeries has a zero-tolerance approach towards bribery and corruption: we will not offer, pay, seek or accept any payments, gifts or other favours (e.g. promise of a job, offer of a trip, charitable contribution) to improperly influence a business outcome. Lotus Bakeries accepts and offers gifts and hospitality only as an appropriate business courtesy, i.e. they should occur sparingly, always be appropriate (e.g. modesty priced gifts or entertainment) and cannot influence business decisions. Lotus Bakeries requests the same zero-tolerance from its key suppliers. No confirmed incidents of corruption have been reported in the financial year 2021. | Code of Conduct Supplier Code of Conduct | GRI 205-2 GRI 205-3 |

03. CONTRIBUTION TO THE UN SDGS

When signing the UN Global Compact Lotus Bakeries committed to support the broader development goals of the United Nations. Lotus Bakeries supports the SDGs in different ways.

LOTUS BAKERIES FOUNDATION FOR EDUCATION

Lotus Bakeries strongly believes that education is the key to breaking the vicious circle of poverty.

With its Foundation for Education Lotus Bakeries contributes to prospects for future generations through carefully chosen education and training projects and contributes to different SDGs. In the reporting period 01.01.2021-31.12.2021 Lotus Bakeries supported the following six development projects within the Lotus Bakeries Foundation for Education:

- Kusasa School
- Lotus Bakeries child sponsorship
- TAJO
- City Pirates
- Gooikenshoeve
- Entrepreneurs for Entrepreneurs literacy training for women



Lotus Bakeries refers to its Annual Report 2021, pp. 128-134 describing these projects in more detail.

LOTUS BAKERIES CORPORATE SUSTAINABILITY REPORTING AND LINK WITH THE SDGS

We include hereafter Lotus Bakeries' GRI Report 2021. It indicates the link between the SDGs we support and our corporate sustainability reporting.

RELEVANT GRI STANDARDS AND LINK WITH THE SDGS





GRI 102 - GENERAL DISCLOSURES

| n | DC. | AA | IIZ | ١T | ın | A IA | | ni | ٦n | | 0.0 | - |
|---|-----|----|-----|----|----|------|----|----|----|----|-----|----|
| u | ĸυ | ΑN | IIL | ٩H | ıu | NA | LI | П | ٦U | ГΙ | ш | Ε. |

| 102-1 | Name of the company | Lotus Bakeries NV | | | |
|-------|--|---|--|---|-------------------|
| 102-2 | Activities, brands, products and services | Lotus Bakeries is worldwide active in the indulgent and natural sna Annas, Nākd, TREK, BEAR and Kiddylicious brands. Lotus Bakerie South Africa and the US and twenty-one own sales organisations partners in approximately fifty countries worldwide. | s has production facilities in Bel | gium, the Netherlands, Fr | ance, Sweden, |
| | | Lotus Bakeries has 2.398 employees on his payroll as per 31.12.202 | 1. | | |
| | | For further information: www.lotusbakeries.com | | | |
| 102-3 | Location of headquarters | Lotus Bakeries NV, Gentstraat 1, 9971 – Lembeke, Belgium | | | |
| 102-4 | Location of operations | We refer to www.lotusbakeries.com | | | |
| 102-5 | Nature of ownership | Lotus Bakeries NV (The Company') was incorporated on March 3 Belgium at Gentstraat 1. The Company is registered in Belgium. Ti 2002 on the continuous market of Euronext (Brussels). Previously code is LOTB (ISIN code 0003604155). | ne Lotus Bakeries shares have b | een listed since the begin | ning of January |
| | | As at December 31, 2021, the market capitalization based on issue million). $ \\$ | d shares was EUR 4.561,51 millio | on (December 31, 2020, E | EUR 3.002,93 |
| | | The significant shareholders of the Company are listed in chapter shareholders structure, page 179 of the Annual Report 2021. | 4 – Report of the Board of Direc | ctors, under paragraph 'Sh | nareholders and |
| 102-6 | Markets served | Lotus Bakeries offers its products in approximately 50 countries ac | ross Europe, America, Asia Pac | fic and the Middle East. | |
| | | The Company serves customers in the retail channel, distributors, $ \\$ | the out of home channel, airline | s, B2B and B2C. | |
| 102-7 | Scale of the organization | As per December 31, 2021, the total number of the internal workforms ale organizations in 15 countries. | rce was 2.398 and Lotus Bakeri | es operated 12 factories a | nd had 21 own |
| | | The annual sales in 2021 amounted to EUR 750,3 million. In 2021 l | otus Bakeries achieved a growt | h of 13,1 %. | |
| | | The company's consolidated equity amounted to EUR 519,5 millio | n in 2021 (EUR 433,7 million in | 2020) | |
| | | The company's net financial debt was EUR 81,8 million compared | to EUR 110,5 million in 2020. | | |
| | | We further refer to the Annual Report 2021, pages 20-21 for some consolidated equity. We further refer to the Financial Supplement | key figures and to the Financial pages 28-32 for the geographic | Supplement pages 6-7 for segment reporting. | or details on the |
| 102-8 | Information on employees and other workers | At the end of 2021 Lotus Bakeries had an internal workforce of 2.3 limited or unlimited duration, full-time or part-time. | 98 employees, who have an em | ployment contract with L | otus Bakeries of |
| | | The Company had 1.235 female internal employees and 1.163 male | internal employees. | | |
| | | Headcount per country where we have presence | М | F | Total |
| | | BE | 597 | 636 | 1233 |
| | | SA NL | 191 129 | 252 100 | 443 229 |
| | | UK | 50 | 70 | 120 |
| | | FR | 72 | 67 | 139 |
| | | US | 49 | 43 | 92 |
| | | China | 14 | 14 | 28 |
| | | South Korea | 8 | 11 | 19 |
| | | Sweden | 18 | 5 | 23 |
| | | Other (AT, CHE, CZ, DE, ES, IT, HK) | 35 | 37 | 72 |
| | | Total | 1.163 | 1.235 | 2.398 |
| | | Lotus Bakeries internal workforce has a good spread over the diffe 27% are under the age of 30 30% are between 30 and 39 years old 21% is between 40 and 49 years old 19% is between 50 and 59 years old And 3% are over 60 years old. | rent age categories. | | |
| | | The average age as per December 31, 2021 is 39 years. | | | |
| | | Information is mainly collected in Lotus Bakeries' Internal HR systemid-2021. | em MyLotus ('SuccessFactors') | which is gradually implem | ented from |
| 102-9 | Supply Chain | Lotus Bakeries is active in the indulgent and natural snacking segn Nākd, TREK, BEAR and Kiddylicious brands. | nent with the Lotus, Lotus®Bisco | ff®, Dinosaurus, Peijnenb | urg, Annas, |
| | | Lotus Bakeries sources its raw materials, ingredients and packagin place. Main raw materials are flower, sugar, eggs, fats and fruit and | | ne continent as where pr | oduction takes |
| | | The Palm Oil it sources is 100% RSPO certified. | | | |
| | | The key Palm Oil Suppliers are asked to sign Lotus Bakeries Palm | Oil Policy and 90% has signed. | | |
| | | The Lotus®Biscoff® Chocolate is 100% Rainforest Alliance Certifie | d. | | |
| | | All key Suppliers are asked to sign the Code of Conduct for Suppli | ers. 90.1 % of the key Suppliers | signed the Code of Cond | uct for |

| 102-10 | Significant changes to the organization and its supply chain | In financial year 2021 the significant changes to the organization's size and structure include the following: |
|--------|--|--|
| | зирріў спаш | Lotus Bakeries strengthens its position on the stock exchange to 50% free float. The family shareholders took the initiative for a private placement of shares with the aim of increasing the free float to 50%. Lotus Bakeries signed the UN Global compact and was accepted in March 2021. The Progress Report will be available on the |
| | | website. c. In January 2021 the South African factory was extended with a new BEAR packaging line to serve its international customers. |
| | | d. The international brand "Lotus" Biscoff®" was also introduced in the home countries of the caramelized biscuits, Belgium, the Netherlands and France. |
| | | e. Kiddylicious becomes the N° 1 in the baby snacking category in the UK. f. In Lembeke (BE) the factory is extended with a new Lotus® Biscoff® production line. |
| | | g. Both the factories in Lembeke (BE) and Mebane (US) are prepared for further extensions in 2022. |
| | | We further refer to the Annual Report 2021, pages 14-19 |
| 02-11 | Precautionary principles or approach | All production plants of Lotus Bakeries are certified according the Global Food Safety Initiative (GFSI) and therefore have a BRC or IFS certificate. |
| | | We request such a certificate also from our Suppliers of raw materials, packaging and production partners. |
| | | In all production sites HACCP principles are developed and food-defense plans to avoid intentional contamination are in place. In 2021 in total 87 internal quality and food safety audits were carried out by the Corporate Quality Assurance Department, whereby every production site was at least 5 times audited. |
| | | Our external production partners are also audited by the Corporate Quality Assurance Department. Due to COVID-19 a more limited number of audits at our external production partners took place. 4 physical and 16 digital quality reviews took place. |
| | | In all countries where Lotus Bakeries commercialises its products, the Company is in compliance with local law on food safety and labelling. |
| | | Recall procedures are in place and every production site has a trained crisis management team. In 2021 no recalls have taken place. |
| | | Lotus Bakeries uses only RSPO certified Palm Oil. |
| | | The Lotus® Biscoff® Chocolate is 100% Rainforest Certified. |
| 02-12 | External initiatives | In March 2021 Lotus Bakeries signed the United Nations Global Compact. |
| | | Lotus Bakeries is an active member of Ceflex and endorses the strategy that has been determined by CEFLEX. The 'Design for a circular economy'-guidelines of CEFLEX are taken as a basis to determine the technical recyclability of Lotus Bakeries flexible packaging. Lotus Bakeries endorses the design-guidelines of Recyclass for rigid packaging. Lotus Bakeries endorses the EllenMacArthur and ISO18601 definition of packaging component. |
| | | Lotus Bakeries endorses the Rainforest Alliance for its Lotus Biscoff® Chocolate. Lotus Bakeries is a Member of RSPO. Lotus Bakeries uses RSPO certified Palm Oil. Lotus Bakeries is a member of the RTRS (Round Table on Responsible Soy Assocciation, Switzerland) |
| 02-13 | Membership in associations | Lotus Bakeries has amongst others following memberships: |
| | | Roundtable on Sustainable Palm Oil (RSPO), Malaysia, Round Tabel on Responsible Soy Association, Switzerland (RTRS), Belgian Alliance for Sustainable Palm Oil, Fevia, Choprabisco, CCI, Belgian Association of Listed Companies, BEMAS, BAM, ICCI, Greenblue, Ceflex, Food Security, Pack4Food, VCK, HFCE Halal Food council of Europe, Flocert, VOKA, The Consumer Goods, Foundation for Global Compact, Entrepreneurs for Entrepreneurs. |
| STRATI | ECV . | |
| 02-14 | Statement from senior decision-maker | We refer to Chapter 2 of the Annual Report 2021 – Care for Today, Respect for Tomorrow, page 82, for the Statement of Jan Boone, CEO Lotus Bakeries Group. |
| 02-15 | Key impacts, risks and opportunities | We refer to Chapter 4 – Report of the Board of Directors, pages 204-209, covering key risks and mitigating actions |
| THICS | AND INTEGRITY | |
| 02-16 | Values, principles, standards and norm of behaviour | Lotus Bakeries' values are Team Spirit, Open Dialogue and Passion (TOP). |
| | | Lotus Bakeries' Code of Conduct reflects these values. |
| | | The Code of Conduct has been developed in 2020 and approved by the Board of Directors on 2 April 2020. |
| | | Lotus Bakeries is committed to act with integrity, honesty, fairness and in full compliance with applicable laws, rules and regulations at all times. |
| | | It has developed a code of conduct which sets out 6 key principles which must be respected by all employees of Lotus Bakeries at all times. The Code of Conduct is part of the onboarding package. |
| | | We further refer to the Annual Report 2021, Chapter 2, pages 116-119. |
| 102-17 | Mechanisms for advice and concerns about ethics | Concerns around the Code of Conduct can be reported by all employees of Lotus Bakeries to the Compliance Officer. Lotus Bakeries prohibits retaliation against any person who reports issues in good faith and commits to investigate any such reported issues. Lotus Bakeries will take corrective action if warranted by the situation. Failure to comply with the Code may result in disciplinary or legal action. |
| | | Aside questions in relation with the application of the Code of Conduct, in 2021, 2 complaints were received and investigated. Both complaints could be handled locally and did not require further escalation. |
| | | |

GOVERNANCE

| 102-18 | | |
|--|---|--|
| 102 10 | Governance Structure | The Executive Committee ("EXCO") determines Lotus Bakeries Group's strategy and objectives and submits them to the Board of Directors for approval. |
| | | This strategy is implemented by the country and regional organisations ('areas') in the different business units, supported by the corporate departments. |
| | | Committees of the highest governance body include the Board of Directors, the Audit Committee and the Remuneration and Nomination Committee. |
| | | Lotus Bakeries' 'Care for Today, Respect for Tomorrow' sustainability strategy is the responsibility of the Executive Committee (EXCO') that reports regularly to the Board of Directors on this topic. |
| | | We refer to the Annual Report 2021 page 84 for the decision-making on environmental and social topics. |
| | | We also refer to the Annual Report 2021, Chapter 4 – Report of the Board of Directors, page 176 covering the Corporate Governance Declaration |
| 102-20 | Executive-level responsibility for economic, environmental and social topics | The Executive Committee (EXCO) has the responsibility for economic, environmental and social topics and reports regularly to the Board of Directors. The CFO, member of the executive committee, is responsible for environmental and social topics. |
| 102-22 | Composition of the highest governance body and its committees | We refer to the Annual Report 2021, Chapter 4 'Report of the Board of Directors', paragraph Board of Directors and Committees of the Board of Directors, pages 180-184. |
| 102-23 | Chair of the highest governance body | The Chair of the highest governance body is not an executive officer in the organization. |
| 102-24 | Nominating and selecting the highest governance body | We refer to the Annual Report 2021, Chapter 4 'Report of the Board of Directors' page 184. |
| 102-25 | Conflicts of interests | Conflict of interest is governed by the Belgian Companies and Associations Code. |
| | | In the course of 2021, there were no incidences within the Board of Directors which led to the application of the conflict of interest procedure as set out in Articles 7:96 and 7:97 of the Companies and Associations Code. |
| | | We refer to the Annual Report 2021, Chapter 4 'Report of the Board of Directors' page 183. |
| 102-26 | Role of highest governance body in setting purpose, values and strategy | Lotus Bakeries' 'Care for Today, Respect for Tomorrow' sustainability strategy is the responsibility of the Executive Committee (EXCO). The EXCO reports regularly to the Board of Directors about the various priorities and actions. |
| 102-28 | Evaluating the highest governance body's performance | We refer to the Annual Report 2021, chapter 4 'Report of the Board of Directors', paragraph on Evaluation of the Board of Directors and its Committees, page 184. |
| 102-31 | Review of economic, environmental and social topics | During 2021 following points were discussed in the Board of Directors: The ESG strategie The ESG action points Status and progress of recyclable packaging Young Graduates project on reduction of CO ₃ -emissions |
| 102-32 | Highest governance body's role in sustainability reporting | The highest governance body that reviews the sustainability reporting is the Board of Directors. |
| 102-35 | Remuneration policies | We refer to the Annual Report 2021, Chapter 4 'Report of the Board of Directors', paragraph on 'Remuneration Report', pages 190-193 for the remuneration of the Board of Directors and to pages 198-199 for the remuneration of the Executive Managers. |
| | Process for determining remuneration | We refer to the Annual Report 2021, Chapter 4 'Report of the Board of Directors', paragraph on 'Remuneration Report', pages 190-193 for the remuneration of the Board of Directors and to pages 198-199 for the remuneration of the Executive Managers. |
| 102-36 | | are remained at on the board of birectors and to pages 150 155 for the remained at of the excedure 1 language. |
| | HOLDER ENGAGEMENT | are terminated of the body of breezes and to pages 150 177 for the terminated of the Encoder C. Handgard. |
| STAKEI | HOLDER ENGAGEMENT List of stakeholder groups | The major stakeholder groups are employees, customers, suppliers, shareholders, investors, policymakers, NGOs, sector experts, knowledge institutions, opinion makers in the markets in which Lotus Bakeries operates. |
| STAKE 102-40 | | The major stakeholder groups are employees, customers, suppliers, shareholders, investors, policymakers, NGOs, sector experts, |
| STAKE 102-40 102-41 | List of stakeholder groups | The major stakeholder groups are employees, customers, suppliers, shareholders, investors, policymakers, NGOs, sector experts, knowledge institutions, opinion makers in the markets in which Lotus Bakeries operates. |
| STAKE H 102-40 102-41 102-42 | List of stakeholder groups Collective bargaining agreements | The major stakeholder groups are employees, customers, suppliers, shareholders, investors, policymakers, NGOs, sector experts, knowledge institutions, opinion makers in the markets in which Lotus Bakeries operates. All employees have the right to collective bargaining. At least 50% is covered by collective bargaining agreements. Lotus Bakeries engages with all identified stakeholder groups to implement our sustainability programme: 'Care for Today, Respect for |
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REPORTING PRACTICE

| 102-45 | Entities included in the consolidated financial statements | All fully consolidated subsidiaries are included. We refer to the Annual Report 2021- Financial Supplement, Note 1.1. |
|--------|--|---|
| 102-46 | Defining report content and topic boundaries | Lotus Bakeries aims for a continuous and transparent reporting on its sustainability activities and achievements. Its annual sustainability results are verified by an external third party. We refer to the Annual Report 2021, page 138. |
| | | The Company aims to let all stakeholder groups contribute to its materiality matrix. |
| | | Lotus Bakeries takes into consideration its size and reach. With production operations in 6 countries spread over 3 continents and a worldwide presence via its sales offices and commercial partners Lotus Bakeries is an important player in the indulgent and natural snacking segment. |
| | | Lotus Bakeries engages whenever possible with third-party suppliers who are also engaging on sustainabiliy issues. |
| 102-47 | List of material topics | We refer to the Annual Report 2021, Chapter 2, 'Our sustainability programme: Care for Today, Respect for Tomorrow', page 85. |
| 102-48 | Restatement of information | Following an analysis within the CSR project, the calculation of the external consultant was refined. As a consequence the amount of CO ₂ emissions reported last year in the Annual Report 2020 increased. Additional certificates have been purchased in order to maintain the CO ₂ neutrality. |
| 102-49 | Changes in reporting | None |
| 102-50 | Reporting period | 01.01.2021-31.12.2021 |
| 102-51 | Date of most recent report | Annual report 2020 (April 2021) |
| 102-52 | Reporting cycle | Annual |
| 102-53 | Contact point for questions regarding the report | For further information about the data of the Annual Report or the GRI report please contact Lotus Bakeries NV Corporate Secretary via $corporate @lotus bakeries.com$ |
| 102-54 | Claims of reporting in accordance with the GRI Standards | This report has been prepared following the GRI Standards Core option. |
| 102-55 | GRI content index | See individual GRI Disclosures. |
| 102-56 | External assurance | An assurance report and statement is publicly available as part of the Annual Report 2021, Chapter 2, page 138. The auditing partner is PwC reviseurs d'Entreprises SRL. |

GRI 103 - UNIVERSAL STANDARD: MANAGEMENT APPROACH

103-1 Explanation of the material topic and its boundary In its programme 'Care for Today, Respect for Tomorrow' Lotus Bakeries addresses following material topics:

Technical recyclability of packaging:

Packaging is needed to protect the product and to create a barrier to external influences. Quality packaging also means that Lotus Bakeries products have a longer shelf-life and help to prevent food-waste. At the same time Lotus Bakeries recognises the problems associated with the use of packaging, such as ocean pollution, carbon emissions and the use of non-renewable resources.

2. Climate change, deforestation and responsible sourcing:

Lotus Bakeries is aware of the impact GHG emissions have on global warming but also sees opportunities to contribute to society and to limit global warming. Lotus Bakeries is aware of the fact that certain crops might lead to deforestation, one of the biggest causes of global warming.

3. Talent, diversity, health and safety of employees:

Attracting the best talents is the basis for Lotus Bakeries' growth and success.

4. Community:

- Lotus Bakeries stands up to its social responsibility. The Company guarantees ethical business practices throughout the
 organisation and with its stakeholders.
- With its Foundation for Education Lotus Bakeries supports educational projects and helps to build a future for generations to come.

103-2 The management approach and its components

Lotus Bakeries set up its Care for Today, Respect for Tomorrow programme which is supported by the full Executive Committee. The sponsor of the programme is the CFO, member of the Executive Committee, with managerial leadership by the CSR Project Manager. The programme is built around 3 pillars environment, employees and community.

Technical recyclability of packaging:

Lotus Bakeries has formulated a packaging strategy focused on reducing packaging, innovative design and investing in circularity. Lotus Bakeries has the ambition to have 100% of the packaging of all Lotus Bakeries brands technical recyclable by 2025. As per December 31, 2021 Lotus Bakeries achieved technical recyclability for 97,1% of all the packaging of its branded products.

2. Climate change, deforestation and responsible sourcing

- Since 2015 Lotus Bakeries' production is CO₂-neutral.
- b. Lotus Bakeries will subscribe the SBTi commitment in 2022.
- . Lotus Bakeries did a first screening of its scope 3 emissions in 2021. More than 90% of the upstream and downstream activities were taken into account for this exercise.
- d. Based upon this screening exercise we can conclude that 94% of the total carbon footprint (Scope1+2+3) relates to scope 3. Within scope 3 purchased goods and services represent 97%.
- Lotus Bakeries is always trying to source as much as possible locally on the same continent as where production takes
 place and to limit the distance between farmer and production plant.
- f. The cocoa mass and cocoa butter in Lotus Biscoff Chocolate is 100% Rainforest Alliance certified.
- g. Lotus Bakeries uses only 100% RSPO certified palm oil.

Talent, diversity, health and safety of employees:

Lotus Bakeries follows a recruitment policy designed to attract a diversified and talented group of people who have the TOP values at heart. Lotus Bakeries is committed to long-term employment and offers employees a pleasant, challenging, inspiring and safe working place. To have real time data available it started to implement MyLotus (SuccessFactors) which is also a tool for the employees to connect more easily.

Community

- a. Lotus bakeries is fully committed to conduct business with integrity and has implemented its Code of Conduct and request its key suppliers to sign the Supplier Code of Conduct. It further request its key Palm Oil Suppliers to apply the Palm Oil Policy which incorporates the NDPE-principle and asks suppliers amongst others to invest in initiatives to support smallholder producers and to restore forests.
- Lotus Bakeries aims to make a substantial contribution to carefully selected educational projects focusing on providing
 quality education to disadvantaged children and young people. It supports projects focussing on primary and secondary
 education, as well as technical skills and extracurricular cultural or sports activities.

| 103-3 | Evaluation of the management approach | Lotus Bakeries runs a range of projects and activities. |
|-------|---------------------------------------|--|
| | | Results and progress are reviewed and evaluated on periodical basis by the Executive Committee Members and by the Board of Directors. |
| | | In addition Lotus Bakeries works together with external experts or organisations to improve its sustainability performance and to contrib- |
| | | ute to the industry movement towards a more sustainable production and circular economy. |

GRI 200 - TOPIC-SPECIFIC STANDARD: ECONOMIC GRI 201 - ECONOMIC PERFORMANCE

| 201-1 | Direct economic value generated and distributed | We refer to the Financial Supplement to the Annual Report 2021. |
|-------|--|--|
| 201-2 | Financial implications and other risks and opportunities due to climate change | The business of Lotus Bakeries depends primarily on the availability of key raw materials such as flower, sugar, eggs, oils, fats, fruit and vegetables. |
| | | Events such as changes in temperatures, poor-weather conditions, soil degradation can negatively impact the availability and price of these raw materials and affect the business. Climate change has an impact on the agricultural regions where those raw materials are grown. |
| 201-3 | Defined benefit plan obligations and other retirement plans | For risks relating to pension plans we refer to Chapter 4 of the Annual Report 2021, the paragraph on 'Enterprise Risk Management', pages 206-207. |
| | | Lotus Bakeries accounts for her pension liabilities according IAS 19, we refer to the Financial Supplement to the Annual Report 2021, note 18 Pension Liabilities. |

GRI 203 - INDIRECT ECONOMIC IMPACTS

| 203-2 | Significant indirect impacts | With its Foundation for Education Lotus Bakeries wants to contribute to carefully selected educational projects focusing on providing quality education to disadvantaged children and young people. |
|-------|------------------------------|---|
| | | Lotus Bakeries is convinced that education is the key to breaking the vicious circle of poverty. |
| | | Lotus Bakeries is further supporting the emancipation of women in Benin and the Democratic Republic of Congo. |
| | | We refer to the Annual Report 2021, Chapter 2, pages 128-135. |

GRI 205 - ANTI-CORRUPTION

| 205-2 | Communication and training about anti-corruption policies and procedures | The Lotus Bakeries Code of Conduct and Supplier Code of Conduct contain a zero-tolerance approach towards bribery and corruption. A supplier shall not offer, pay, seek or accept any payments, gifts or other favours (e.g. promise of a job, charitable contribution) to improperly influence a business outcome. |
|-------|--|--|
| 205-3 | Confirmed incidents of corruption and actions taken | No confirmed incidents of corruption have been reported in the financial year 2021. |

GRI 206 - ANTI-COMPETITIVE BEHAVIOUR

| 206-1 | Legal actions for anti-competitive behaviour, | Lotus Bakeries has no pending legal actions for anti-competitive behaviour, antitrust and monopoly practices. |
|-------|---|---|
| | anti-trust and monopoly practice | |

GRI 300 - ENVIRONMENTAL STANDARDS GRI 301 - MATERIALS

| 301-2 | Recycled input materials used | Lotus Bakeries prefers to use recycled content for its packaging without losing sight of the requirements for quality and functionality. The Company aims for the maximum technically achievable. As per end 2021 Lotus Bakeries has reached an average of 75 % recycled content across all cardboard packing for its brands. |
|-------|-------------------------------|---|
| | | Overall Lotus Bakeries reached 57,9 % recycled content across all packing materials for its brands. |

GRI 302 - ENERGY

| 302-1 | Energy consumption within the organization | The total energy consumption was 152.401 MWh. The amount from renewable sources was 47.088 MWh and from non-renewable sources 105.313 MWh. Total electricity use was 47.088 MWh of which 47.088 MWh from own production from renewable sources or offset with certificates. The CO ₂ e-emissions from energy used have been fully offset. |
|-------|--|--|
| 302-3 | Energy intensity | The energy intensity ratio per ton of production is 1.064 kWh/ton. Energy consumption includes electricity, gas, fuel, coal and renewable energy. The energy ratio is based on energy consumption within our own sites. |

GRI 303 - WATER & EFFLUENTS

| 303-1 Water withdrawal by source | Lotus Bakeries is withdrawing water from municipal water supplies and is collecting rainwater. It is re-using water as much as possible. Lotus bakeries has on 1 site an own waste water treatment station. In other production plants waste water is collected to be treated by an external party. | |
|----------------------------------|--|---|
| | | Although Lotus Bakeries is not a major water user, Lotus Bakeries is starting to report its water use internally. With the collected information Lotus Bakeries will start monitoring |

GRI 305 - EMISSIONS

| 305-1 | Direct (Scope1) GHG emissions | The total direct (Scope1) GHG-emissions are 23.374 tCO ₂ e. All GHG emissions are included. The calculation of the carbon footprint is done by an external party using the Bilan Carbone® methodology. The scope of the calculation includes all own sites of Lotus Bakeries. All emissions have been offset with certificates. |
|-------|--|--|
| 305-2 | Energy indirect (Scope2) GHG emissions | The total GHG emissions of electricity used amounts is nil. |
| 305-4 | GHG emissions intensity | The total Scope 1 and 2 emissions amount to 163 kgCO ₂ e/ton. |
| 305-5 | Reduction of GHG emissions | In 2021 Lotus Bakeries, together with an external expert, carried out a first screening exercise of its Scope 3 emissions. The exercise covered 90% of its upstream and downstream activities. Based on the screening exercise Lotus Bakeries noticed that 94 % of its total carbon footprint relates to Scope 3. Within Scope 3 purchased goods and services count for 97%. In 2022 Lotus Bakeries will subscribe the SBTi. |

GRI 306 - WASTE

| 306-1 | Waste generation and significant waste-related impacts | The activities of Lotus Bakeries generate waste in its own activities and downstream. The waste in its own activities relate to production waste, grease, residual waste, paper/cardboard. The waste generated downstream has to do with the end of life of the products. |
|-------|--|--|
| 306-2 | Management of significant waste-related impacts | In order to reduce waste the production waste is as much as possible re-used as animal feed. Different types of waste are sorted to facilitate recycling. Lotus Bakeries supports various systems and initiatives for collecting and recycling of waste, amongst others Ceflex, the Flexible Plastic Fund and contributes to 'Extended Producer Responsibility' systems in various European countries. Lotus Bakeries is designing the packaging of all its branded products to become 100% recyclable by 2025. |
| 306-3 | Waste generated | The total quantity of waste from its own activities amounts to 63 kg/ton produced. |

GRI 307 - ENVIRONMENTAL COMPLIANCE

| 7071 | N | Law Delaction and a district on four 2001 |
|-------|--|---|
| 307-1 | Non-compliance with environmental laws and | Lotus Bakeries received no significant fines in 2021. |
| | | |
| | regulation | |

GRI 308 - SUPPLIER ENVIRONMENTAL ASSESSMENT

| 308-2 | Negative environmental impacts in the supply chain and actions taken | Lotus Bakeries is aware that palm oil might have a negative impact on the environment. |
|-------|--|---|
| | | Therefore 100% of palm oil sourced by Lotus Bakeries is RSPO certified. |
| | | Lotus Bakeries identified 10 suppliers that deliver products containing more than 50% palm oil or palm kernel oil. These are the key palm oil suppliers. |
| | | From these key palm oil suppliers Lotus Bakeries not only requests to sign the Supplier Code of Conduct but also requests to sign and adhere to the principles of the Palm Oil Policy of Lotus Bakeries or request to adhere to their own Palm Oil Policy containing at least the same requirements as the policy of Lotus. |
| | | 100% of the cocoa mass and cocoa butter of the Lotus® Biscoff® Chocolate is Rainforest Alliance certified. |

GRI 400 - TOPIC-SPECIFIC STANDARD SOCIAL GRI 403 - OCCUPATIONAL HEALTH AND SAFETY

| 403-2 | Hazard identification, risk assessment, and incident investigation | An occupational health and safety management system has been implemented in all our sites. |
|-------|--|---|
| | | All occupational accidents are registered and analysed and the necessary measures to mitigate risks are implemented. Every injury needs to be investigated and proper corrective actions need to be implemented. |
| | | Monthly the total amounts of occupational accidents and the lost-time occupational accidents are reported. Lost-time occupational accidents are accidents whereby the employee is unable to return to work the following day. |
| | | The severity and frequency are monthly calculated and reported per site. |
| | | In 2021 the number of occupational accidents involving absence from work amounted to 52 (2020: 62). |
| 403-4 | Worker participation, consultation and communication on occupational health and safety | In the production sites of Lotus Bakeries processes are put in place to allow the workers to point out possible hazardous situations and to suggest processes to mitigate these. |
| | | We further refer to the Annual Report 2021, Chapter 2, pages 111-112. |
| 403-5 | Worker training on occupational health and safety | In the production sites of Lotus Bakeries regular training programmes on health and safety issues are organized. We further refer to the Annual Report, Chapter 2, pages 111-112. |
| | | |

GRI 404 - TRAINING AND EDUCATION

| 404-2 Programs for upgrading employee skills a transition assistance programs | Programs for upgrading employee skills and | Lotus Bakeries has different programs in place to provide various forms of training. |
|---|--|---|
| | | It has on the job training, an onboarding training for all new hires, it organises special courses on specific topics, has HR community meetings, Finance community meetings, sales meetings. |
| | | In 2020 Lotus Bakeries started with a Young Graduate programme. In September 2020 the first 5 young Graduates entered the programme. On September 1, 2021 another 7 Young Graduates started. |

GRI 405 - DIVERSITY AND EQUAL OPPORTUNITY

| 405-1 | Diversity of governance bodies and employees | Lotus Bakeries has a good gender balance in the different countries where it operates. |
|-------|--|--|
| | | For an overview of the gender balance at different levels in the Company and in the different countries we refer to the Annual Report 2021, Chapter 2, pages 104-105 and to GRI 102-8. |

GRI 407 - FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

| 407-1 | Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk. | The Code of Conduct and the Supplier Code of Conduct explicitly state that all workers should have the freedom of association and a right to collective bargaining. |
|-------|---|---|
|-------|---|---|

GRI 408 - CHILD LABOUR

| 408-1 | Operations and suppliers at significant risk for incidents of child labour | The Code of Conduct and the Supplier Code of Conduct of Lotus Bakeries expressly prohibit child labour. All workers should be of an appropriate age. Children's right to childhood & education should be respected at all times and no child labour is accepted (as defined by the ILO International Labour Standards on Child Labour. |
|-------|--|--|
| | | In its own operations Lotus Bakeries does not allow child labour. |

GRI 409 - FORCED LABOR

| 409-1 | Operations and suppliers at significant risk for incidents of forced or compulsory labour | Lotus Bakeries' Code of Conduct and its Supplier Code of Conduct foresee that work should be conducted on a voluntary basis and on the basis of documented terms of employment. |
|-------|--|---|
| | | All workers should be paid fair wages, in line with applicable laws and appropriate prevailing industry standards. |

GRI 419 - SOCIOECONOMIC COMPLIANCE

| 419-1 | Socioeconomic compliance | Lotus Bakeries has not identified significant fines or non-monetary sanctions for non-compliance with laws in the social and economic area in financial year 2021. |
|-------|--------------------------|--|
|-------|--------------------------|--|

CONSULT OUR ANNUAL REPORT 2021 HERE

REGISTERED OFFICE

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Register of legal persons of Ghent, Enterprise number 0401.030.860

CONTACT

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