

**Jerónimo
Martins**



*Sustainability
Statement*

**Jerónimo
Martins**



2024

*Non-financial
Report*

Sustainability Statement

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1. 2024 Highlights

Our more than two centuries of history reflects the responsible way in which we carry out our business activities and the medium and long-term vision underlying the decisions we take throughout the value chain.

In 2024, and as a result of the continued work of our teams, we were included in over 140 international sustainability indices that recognise our good sustainability practices.

Food distribution accounts for more than 98% of consolidated sales and our mission is to meet the needs of the millions of consumers who visit our stores every day, by delivering quality food at competitive prices.

The investments we make to provide affordable, safe and quality products are reflected, for example, in food safety audits of suppliers and analyses of the products we sell. This has helped reduce the number of products we have had to remove from the shelves for safety or quality reasons by 24% compared to 2023.

The food we sell in our stores is healthier and our recipes formulations have avoided the consumption of 576 tonnes of sugar, around 170 tonnes of fats, and 60 tonnes of salt, without compromising on taste and consumer preference.

At the same time, more than 90% of the food sold in our stores is sourced from local suppliers, a practice we have ensured for over a decade.

In Colombia, we are making a very relevant social investment to provide support in the amount of one million euros, by 2026, for projects to fight food shortages and support local communities, with an impact on more than 60,000 people, especially children, young people and mothers. As a result of our efforts, we were awarded the Portafolio 30 años prize by Portafolio magazine in the "sustainability" category.

As regards social initiatives, Humpact ranked us as one of the companies with the best performance among the 46 assessed in the consumer goods sector, giving us the maximum score for the way we contribute to the United Nations Sustainable Development Goals. We were also honoured at the Wellbeing Awards, in the "People Choice Awards" category, reflecting the positive perception of our employees.

The growth of our operations has made us an increasingly diverse and multicultural employer, with 87 nationalities represented in the Group and four different generations in our workplaces. The year 2024 will be marked by our inclusion in the FTSE Diversity & Inclusion Index – Top 100, an index that identifies the 100 publicly traded companies with the best performance in promoting inclusive workplaces. We are actually the only company in Portugal and also in the "supermarkets and convenience stores" category to be listed on this index, which analysed more than 15,500 companies from all over the world.

For the fourth consecutive year, we were included in the select group of companies worldwide to receive the highest score ('A') for their practices in fighting climate change. The CDP's annual assessment ranks us at leadership level ('A-') both in the management of water as a critical resource and in the management of the commodities most associated with deforestation risk (palm oil, paper/wood, beef and soy). This distinction recognises not only the actions we have taken throughout the year, but also the transparency of the information we report.

We reduced our carbon footprint by 15.8% in 2024 compared to 2023, against a 9.3% increase in turnover. Direct emissions from own operations (scope 1) and those of our energy suppliers (scope 2) have been decreasing due to investments in energy production (we closed the year with photovoltaic panels installed in more than 2,000 stores and distribution centres), the purchase of electricity from renewable sources, and the modernisation of equipment that runs on refrigerants. Part of these investments are financed by instruments linked to our sustainability commitments. In 2024, these sustainable finance instruments gained greater materiality, accounting for around 25% of our consolidated financing.

Environmental highlights

- We reduced our carbon emissions (scope 1 and 2) by 15.8%, compared to 2023.
- We reduced our energy consumption by 9.3% (per million euros of sales).
- We now have over 2,000 stores and distribution centres with photovoltaic panels.
- We reduced the packaging materials used in our Private Brands by 10.9% (per million euros of sales).

Social highlights

- We invested 354 million euros in recognising our employees (13% more than in 2023), and 17 million euros in training them.
- We invested over 48.4 million euros in internal social responsibility (ISR) measures and 7.8 million euros in initiatives and programmes that promote wellbeing.
- More than 121 million were invested to support local communities, which includes the 40 million attributed to the newly created Jerónimo Martins Foundation.
- We prevented 576 tonnes of sugar, 169 tonnes of fat, and 60 tonnes of salt from entering the market through the nutritional reformulation of our Private Brand and perishable products.

Governance highlights

- We continued our efforts to promote training within the organisation on business conduct. In 2024, 27,455 employees received training on the Group's Code of Conduct, and 21,953 were trained on the Group's Anticorruption Policy. Therefore, representing an increase of 22,204 and 6,366 employees compared to 2023, respectively.
- We source over 90% of our food purchases from local suppliers.
- We ensure that environmental criteria are included in our processes for selecting potential Private Brand and perishables suppliers, and that the criteria are given the same weight in both the quality and the food safety audit components. In 2024, a total of 179 new suppliers were assessed and approved after meeting both criteria.

2. General Disclosures

2.1. Basis for preparation

[ESRS 2 BP-1, ESRS 2 BP-2]

The sustainability statement of the Jerónimo Martins Group was prepared in accordance with the ESRS (European Sustainability Reporting Standards) as outlined in the CSRD (Corporate Sustainability Reporting Directive). In subchapter 7. "Reporting frameworks" we aim at relating this statement with other sustainability standards, namely GRI (Global Reporting Initiative), SASB (Sustainability Accounting Standards Board), and IFRS S (International Financial Reporting Standards Sustainability). This approach allows for greater interoperability and comparability of information, ensuring that the statement meets the expectations of various stakeholders, among which actual and potential investors. It also provides additional sustainability information required by other legislation and specific standards and frameworks.

How to read this report

The following pages of this report refer to our Group's value chain, including identified impacts, risks, and opportunities upstream, downstream, and within own operations. In specific cases, as stated in the respective indicator, we may claim omission of information due to "intellectual property, know-how, or the results of innovation", as described in the ESRS.

As part of our business strategy and reporting, aligned with the principle of sustainable development, this sustainability statement was prepared on a consolidated basis, considering the same scope as for the financial statements. Referring to the year 2024 (from January 1 to December 31), it includes the Companies of the Group: Jerónimo Martins' Holding and its subsidiaries, joint ventures, and associate companies. The time horizon considered in this report is the same as the one in the financial statements. The Jerónimo Martins Group assesses impacts, risks, and opportunities across the time frames defined by ESRS 1: short-term (one year), medium-term (two to five years), and long-term (more than five years). Where applicable, metrics and estimates used to calculate certain indicators is noted in the respective topic, along with the sources of the information used. The same applies to cases where the scope of Companies considered varies from those of the financial statements.

The sustainability disclosures in this report have been significantly expanded to comply with the new requirements of the CSRD and ESRS, which are being implemented for the first time in 2024, albeit the transposition into national law of the CSRD has not taken place in Portugal, where the Group's headquarters are located. This expansion includes more comprehensive data and information to meet the revised reporting standards. If there have been changes in practices or if errors from previous reporting periods have been identified, these are clearly described in the specific sections where the topics are discussed. In the same way, the information provided will always be restated whenever deemed important and necessary to ensure accurate and reliable information up to the final publication of the report on the Group's website. Moreover, updates will be made on the dedicated 2024 annual report website, whenever their importance and necessity are verified.

This is also the first year in which our sustainability statement is no longer organised by pillars of Corporate Responsibility action. Our policies, strategy and targets have been distributed across the several dimensions of the ESG formula, in line with the recommendations of the ESRS. Our commitment to transparency in corporate reporting, reinforced by our presence in over 140 sustainability indices, translates into our continuous efforts to improving the quality and granularity of the data reported year-on-year. For this reason, in this sustainability statement you will find the mandatory detailed information regarding topics identified as material, as well as a set of actions and indicators related to topics that although not reaching the materiality threshold we nevertheless consider relevant for our business and/or at least some of our stakeholders. A clear distinction between the two is ensured by the use of a specific iconography next to the titles/subtitles of each section:



The sustainability statement is subject to a limited assurance review conducted by the Group's appointed external and independent auditor. This review process involves evaluating the accuracy and reliability of the information presented, and providing an additional layer of credibility and confidence in the reported data.

To know more about the basis of preparation of this report, please refer to chapter 1 "The Jerónimo Martins Group", chapter 3 "Financial Statements", subchapter 3.1. "Consolidated Financial Statements", section 3.1.2. "Accounting policies", subsection 3.1.2.1. "Basis for presentation", and chapter 4 "Corporate Governance", Part I - "Information on Shareholder Structure, Organisation and Corporate Governance".

2.2. Governance and strategy

[ESRS 2 GOV-1, ESRS 2 GOV-2, ESRS 2 GOV-3, ESRS 2 GOV-4]

[GRI 2-9; GRI 2-12; GRI 2-13; GRI 2-14; GRI 2-15; GRI 2-16; GRI 2-17; GRI 2-18; GRI 2-19; GRI 2-23; GRI 2-24]

Several internal mechanisms and functions collaborate to ensure that our sustainability governance model is effectively guided, supported, and managed.

The Board of Directors retains authority over the Group's strategic management matters, particularly those related to defining the Company's general policies and corporate structure. The Board aims to ensure the economic, financial, social, and environmental sustainability of the Company's long-term objectives, while also making an effective contribution to the broader community. The Board of Directors is composed by eleven members (four women, and seven men) elected for the term of office 2022-2024.

The appointment and replacement of members of the Board of Directors is decided in the Annual Shareholders' Meeting. The Company encourages that the proposals to be submitted by shareholders for the new term of office of the governing bodies are substantiated as to the suitability of the profiles, knowledge and curricula to the function(s) to be performed by each candidate. Therefore, submitted proposals must make reference to these elements, namely to support appointments based on the suitability of the profile, the skills and the *curriculum vitae*, taking into account the last five years. Jerónimo Martins also urges its shareholders to, in the construction of proposals to be presented for new terms of office of the governing bodies, consider diversity requirements, with particular attention to gender diversity, as legally required, and also to contribute to a better performance of such bodies and to the balance of its composition by taking also into account criteria such as competence, independence, integrity, availability, and experience. The Group considers that its shareholders have maintained the safeguard of the diversity of gender, age, qualification and professional background.

In what regards expertise and skills in sustainability matters, the Board of Directors had, in the period 2022-2024, this expertise included in its composition. Notably, one of the Non-executive Directors, brings extensive experience and qualifications in this field with over 20 years of experience in management, consulting, and sustainability. From a management point of view, there are several functional divisions that contribute to addressing and advancing sustainability matters, from which we highlight the Corporate Communications and Responsibility Division, that develops the Group's sustainability strategy, enhancing its reputation and aligning responsible practices across all Companies in their operations and throughout the value chain, and the Group's Chief Corporate Communications and Responsibility Officer, which reports directly to the Board.

The Committee on Corporate Governance and Corporate Responsibility (CCGCR) is the supervisory board for sustainability issues, collaborating with the Board of Directors by assessing and submitting proposals for strategic orientation, continuously monitoring and supervising matters related to: i) corporate governance, social responsibility, the environment, and ethics; ii) the business sustainability of the Group; iii) internal codes of ethics and conduct; and iv) systems for assessing and resolving conflicts of interest, particularly concerning relations between the Company and its shareholders or other stakeholders. In scheduled meetings, the Corporate Communications and Responsibility Division presents to the Committee on Corporate Governance and Corporate Responsibility (CCGCR) an overview of the main challenges, achievements, results and statistics known so far, and shares how the division is implementing measures and actions to address emerging trends and issues in sustainability.

In addition, each of the Group's Companies⁶ have dedicated Sustainability Committees that hold regular meetings, on a frequency of two to four per year based on the volume of turnover they represent for the Group and the impact their activities may have on the Group's sustainability strategy and ability to meet the goals. These meetings aim to define strategies for action and set performance objectives, the progress against which is made public as well as the plans to implement continuous improvement initiatives. The Sustainability Committees are constituted by the directors of the Functional Divisions of each Company. In 2024, 27 meetings were held in total.

To know more about the composition, experience and role of administrative, management and supervisory bodies engaged in effective sustainability governance, how these bodies are informed of sustainability-related matters and how these matters are addressed, please refer to chapter 4 "Corporate Governance", Part I - "Information on Shareholder Structure, Organisation and Corporate Governance", sections A "Shareholder Structure", B "Governing Bodies and Committees" and C "Internal Organisation".

Our Company is committed to integrating sustainability-related performance into incentive schemes, ensuring that our environmental and social objectives are reflected in the goals and rewards of our employees and teams. The CEO performance review process includes an annual performance assessment with quarterly reviews, which are made available to the Remuneration Committee. These assessments and reviews are evidence-based and involve regular monitoring of the execution of objectives and achievement of goals, which include sustainability targets, being the Company's inclusion and ratings in specific ESG indexes the main performance indicator. According to the Remuneration Policy, this performance indicator is part of a set of key-performance indicators that have a 50% weight in the CEO's annual variable remuneration. The achievement of climate-related and other corporate responsibility objectives is also part of the incentive scheme for employees in roles that influence the definition and/or implementation of the Group's climate commitments, targets and actions.

To know more on the integration of sustainability-related performance in incentive schemes, please refer to chapter 4 "Corporate Governance", Part I - "Information on Shareholder Structure, Organisation and Corporate Governance", section D "Remuneration".

In alignment with the European due diligence recommendations, we have been implementing various measures across the Group's Companies to prevent and mitigate the negative impacts of our activities on the environment, as well as in the areas of human and labour rights. This due diligence process follows the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

Main due diligence procedures in place

Core elements of sustainability due diligence	Location in the sustainability statement
a) Embedding sustainability due diligence in governance, strategy, and business model	<p>Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation): Minimum Safeguards</p> <p>GOV-1 Administrative, management and supervisory bodies' responsibilities</p> <p>GOV-2 Information provided and sustainability matters addressed by the bodies</p> <p>GOV-3 Integration of sustainability-related performance in incentive schemes</p> <p>MDR-P Policy overview</p> <p>E1-1 Transition plan for climate change mitigation</p> <p>E1-2 Policies related to climate change mitigation and adaptation</p> <p>E5-1 Policies related to resource use and circular economy</p> <p>E2-1 Policies related to pollution</p> <p>E3-1 – Policies related to water and marine resources</p> <p>E4-2 – Policies related to biodiversity and ecosystems</p> <p>S1-1 Policies related to own workforce</p> <p>S3-1 Policies related to affected communities</p> <p>S4-1 Policies related to consumers and end-users</p> <p>G1-1 Governance structure and composition</p>

⁶ Companies with dedicated Sustainability Committees include Ara, Biedronka, Hebe, Hussel, Jeronymo, JMA, Pingo Doce and Recheio,

Core elements of sustainability due diligence	Location in the sustainability statement
b) Engaging with affected stakeholders in all key steps of the due diligence	<p>S1-2 Processes for engaging with own workforce and workers' representatives about impacts</p> <p>S3-2 Processes for engaging with affected communities about impacts</p> <p>S4-2 Processes for engaging with consumers and end-users about impacts</p> <p>G1-2 Management of relationships with suppliers</p>
c) Identifying and assessing adverse impacts	<p>SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model</p> <p>E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities</p> <p>E5-6 Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities</p> <p>S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns</p> <p>S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns</p>
d) Taking actions to address those adverse impacts	<p>E1-3 Actions and resources in relation to climate change policies</p> <p>E2-2 – Actions and resources related to pollution</p> <p>E3-2 – Actions and resources related to water and marine resources</p> <p>E4-3 – Actions and resources related to biodiversity and ecosystems</p> <p>E5-2 Actions and resources related to resource use and circular economy</p> <p>S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions</p> <p>S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns</p> <p>S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions</p> <p>S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions</p> <p>Actions taken on material impacts, approaches to manage material risks and pursuing material opportunities and effectiveness of those actions, related with:</p> <ul style="list-style-type: none"> • environmental topics such as climate change, pollution, water and marine resources, biodiversity and ecosystems are further described in subchapter 3. “Environmental information”, in their respective subsections of section 3.2. “Managing environmental topics” in this chapter. • own workforce, affected communities and consumers and end-users are further described in subchapter 4. “Social information”, in their respective subsections of subchapter 4.2. “Managing social topics” in this chapter.
e) Tracking the effectiveness of these efforts and communicating	<p>E1-4 Targets related to climate change mitigation and adaptation</p> <p>E1-5 Energy consumption and mix</p> <p>E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions</p> <p>E1-8 Internal carbon pricing</p> <p>E5-3 Targets related to resource use and circular economy</p> <p>E5-5 Resource outflows</p> <p>S1-1 Policies related to own workforce</p> <p>S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</p> <p>S1-9 Diversity metrics</p> <p>S1-10 Adequate wages</p> <p>S1-11 Social protection</p> <p>S1-12 Persons with disabilities</p> <p>S1-14 Health and safety metrics</p> <p>S1-15 Work-life balance metrics</p> <p>S1-16 Remuneration metrics</p> <p>S3-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</p> <p>S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</p>

Our Risk Management Policy and Methodology aims to align the Group's objectives and strategy with a structured and consistent assessment of specific and transversal risks. This approach also allows us to monitor emerging risks that may affect the Group and its Companies.

The annual risk management process developed by our Risk team involves around 70 managers representing the Group's Companies and the countries in which they operate. Its main purpose is to ensure the identification, monitoring, evaluation, and reporting of risks to which Jerónimo Martins and its Companies are exposed, as well as the most relevant mitigation measures. The annual assessment is integrated with the strategic planning process, providing information to the executive management teams of all business units as well as to Jerónimo Martins' Audit Committee and Board of Directors that is duly considered in the development and approval process of all our strategic plans. The risk assessment is also shared with Jerónimo Martins' internal and external auditors, being a relevant input to their respective audit plans. Quarterly reviews are conducted to address critical business issues and actively monitor any emerging risks that are relevant to the Group. For detailed information on risk management and internal controls over sustainability reporting please refer to Chapter 4 "Corporate Governance," Section C – Internal Organisation, Subsection III - Internal Control and Risk Management.

2.3. Stakeholder engagement and communication channels

[ESRS 2 SBM-2]

[GRI 2-16]

The views and interests of our key internal and external stakeholders are continuously discussed within the relevant divisions and areas. Our Corporate Communications and Responsibility Division communicates with transparency the Group's ESG performance, including positive achievements as well as areas of improvement. This disclosure and communication discipline promotes Jerónimo Martins' reputation and contributes to align responsible practices across all Companies. Through constant dialogue with various internal and external stakeholders – whose concerns and expectations are incorporated into our strategic priorities and major lines of action – we also promote a better common understanding of business perspectives. In addition, the Committee on Corporate Governance and Corporate Responsibility monitors and supervises matters concerning corporate governance, social responsibility, the environment, ethics, business sustainability, internal codes of ethics and conduct, and systems for assessing and resolving conflicts of interest, particularly in relations between the Group and its stakeholders.

The Investor Relations Office organizes and participates in events to provide investors with an updated and clear vision of Jerónimo Martins' strategies, operational performance, and outlook. These actions contribute to maintain the level of dialogue that is the benchmark for Jerónimo Martins' stakeholders. In what concerns the reporting strategy, our annual reports are prepared in accordance with the main frameworks, methodologies and information requests made by our stakeholders.

To build lasting partnerships and prioritize quality relationships with the various audiences we interact with, we define specific internal and external communication channels according to the different audiences' needs and expectations to facilitate the best possible alignment.

Jerónimo Martins' stakeholders

Stakeholders	Interfaces	Communication channels
Shareholders and investors	Investor Relations Division.	Corporate website, e-mail, annual reports, corporate magazine, financial releases, meetings, conferences, roadshows, Jerónimo Martins IR app, Investor's Day and shareholders' meetings.
Analysts	Investor Relations Division, Corporate Communications and Responsibility Division.	Corporate website, e-mail, annual reports, corporate magazine, financial releases, meetings, conferences, Jerónimo Martins IR app, and Investor's Day.

Stakeholders	Interfaces	Communication channels
Official bodies, supervising entities and local authorities	Board of Directors, Audit Committee, Investor Relations Division, Tax Divisions, Legal Divisions, Corporate Communications and Responsibility Division.	Corporate website, e-mail and post, corporate magazine and meetings.
Suppliers and business partners	Commercial, Marketing, Quality and Private Brand Development, Food Safety, Environment, Regional Operations, Technical, Expansion, and IT Divisions and the Ethics Committee.	Ethics Committee website, JM Direct Portal, follow-up visits, quality and food safety audits, social and environmental audits, business meetings, direct contacts and corporate magazine.
Employees	Human Resources Divisions, Training School, Ethics Committee, Ethics Offices, Anti-Mobbing, Anti-Discrimination and Sexual Harassment Committee, Committee for Labour Coexistence and Employee Assistance Services.	Ethics Committee website, Human Resources communication channels, help lines, e-mail, internal communication channels.
Employees' representatives	Labour Relations Division, unions, social dialogue forums, union representatives.	Letter, e-mail, social dialogue forums.
Customers and Consumers	Customer Services, Customer Ombudsman and Ethics Committee.	Help lines, e-mail, corporate website and post.
Local Communities	Corporate Communications and Responsibility Division, stores and distribution centres.	Follow-up visits, meetings, protocols and partnerships/patronage and social impact surveys.
Journalists	Corporate Communications and Responsibility Division.	Corporate website, press releases, press conferences, meetings, annual reports and corporate magazine.
Non-governmental organisations and associations	Corporate Communications and Responsibility Division.	Corporate website, e-mail, follow-up visits, meetings, partnerships/patronage and corporate magazine.

Our due diligence processes regarding material impacts are shaped not only by the intrinsic contributions of our stakeholders through their requests and needs via our internal bodies and communication channels, but also by their input in our double materiality matrix survey, which helps define our material impacts.

2.3.1. Mechanisms and channels for raising concerns

[ESRS S1-3; ESRS S1-17; ESRS S2-3; ESRS S3-3; ESRS S4-3; ESRS G1-1]

To ensure our stakeholders raise their concerns and receive direct and adequate responses, the Jerónimo Martins Group provides diverse internal channels:

- the Ethics Committee, a specialized body for monitoring, with exemption and independence, the disclosure and compliance with the Code of Conduct and the Anti-Corruption Policy, thus managing risks effectively, in light of the Whistleblowing Policy approved by the Company. This body discloses, and makes available, a digital platform to confidentially, and anonymously if desired, report infractions;
- the Ethics Offices, independent reporting channels in Portugal, Poland and Slovakia which, alongside the Ethics Committee, are responsible for receiving and following up reports of any irregularities that may violate European Union law, national law and the Code of Conduct;
- the Anti-Mobbing, Anti-Discrimination and Sexual Harassment Committee, formed whenever there is a complaint about these issues in Poland;
- the Committee for Labour Coexistence in Colombia, which investigates complaints related to working conditions or other labour issues;
- the Employee Assistance Services for the reporting, clarification and resolution of labour issues, and for receiving and forwarding social requests. This channel guarantees confidentiality, independence and impartiality, ensuring the protection of employees against possible situations of retaliation, discrimination or reduction of their rights;
- the Companies' Customer Support Services can be engaged directly, at the store level through our employees, namely our store managers, with whom consumers can interact and address any issue

or concern. Customers can also opt to reach the Customer Support Services channels (email, website, telephone, mobile applications social media, among other means), which are specialized structures in each Company that aim at ensuring an efficient response to their suggestions, compliments, ideas, requests for information and complaints. These means of contact, depending on the Company, can be, when applicable, announced in stores, in private brand products' packaging, in receipts and at Companies' websites;

- the [Customer Ombudsman](#), created in 2005 with the objective of preserving consumer confidence and satisfaction, mediates customer relations with the Companies, being independent and neutral. Each process sent is analysed and the necessary steps are taken, culminating in a non-binding opinion and recommendations for action to the Companies.

For detailed information and data on the contacts/procedures that occurred in 2024, please refer to Chapter 4 "Corporate Governance, Section C – Internal Organisation and subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Ethics and compliance", refer to this chapter, as well as subchapter 3. "Environmental information", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection 3.3.5. "Minimum safeguards".

These communication channels are made available to our stakeholders on our public corporate [website](#), and the specific website of the [Ethics Committee](#). Additionally, they are accessible on the websites of our different Companies. The effectiveness in these mechanisms is evidenced by our high percentage of resolved cases. For detailed information and data on the contacts/procedures that occurred in 2024, please refer to subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Ethics and compliance", as well as subsection 4.2.3. "Consumers and end-users", point "Remediating impacts and channels for consumers to raise concerns".

2.4. Managing Sustainability Reporting Risks

[ESRS 2 GOV-5]

The Board of Directors has the ultimate responsibility over the Group's Sustainability disclosures. Nonetheless, there are previous levels of authority in place to ensure consistency, integrity and robustness of ESG data disclosures. It is the case of the Audit Committee, which is responsible for, among others, monitoring the preparation and disclosure of both financial and non-financial information⁷. The Group's CCGCR, as the specialized committee for sustainability issues, is also informed about the Group's processes and actions to ensure alignment with the sustainability reporting frameworks such as the European Sustainability Reporting Standards as well as about the actions in place – and planned – to ensure reporting consistency, robustness and integrity. The Group's Corporate Communications and Responsibility Functional Division, liable for the development, implementation and monitoring of its sustainability strategy, is also responsible for the processes established by the Company for collecting and processing data related to environmental and social sustainability. It is this division that is responsible for providing regular sustainability updates to the CCGCR, the Audit Committee and the Board of Directors.

Our sustainability reporting control systems follow an approach similar to the financial reporting control system although not yet at the same level of maturity as can be verified by the level of assurance of the external verification process: Limited Assurance for Sustainability disclosures and Reasonable Assurance for Financial disclosures. It is our aim to progressively work towards ensuring Sustainability assurance level matches Financial assurance levels.

As the sustainability reporting scope has been significantly increasing over the years – we currently verify over 240 ESG-related indicators to different sustainability frameworks –, we have established a wider range of internal controls to support identification and mitigation of the risks related to data accuracy and completeness. One example includes regular internal reporting of key indicators and metrics to measure progress throughout the year, and identifying relevant information gaps, inconsistencies or even needs of adapting data collection and consolidation to changes in the methodologies prescribed in the sustainability

⁷ Information on the responsibilities of the Audit Committee is available in chapter 4 "Corporate Governance", Part I – "Information on Shareholder Structure, Organization and Corporate Governance", section B – "Corporate Bodies and Committees", subsection III – "Supervision (Audit Committee)", point 30. "Details of the Supervisory Board (Audit Committee) Representing the Model Adopted".

frameworks the Group uses to disclose sustainability data. This allows us to identify and address these issues on a regular basis. The collection of these indicators vary between every trimester, semester or annual basis and is done in cooperation with internal data owners within each of the Group's Companies.

In 2024, we considered previous years' ESG assurance processes and their recommendations, as well as observations from the Group's Internal Audit Division, and identified the main risks that could directly or indirectly impact our sustainability statement: misstatement of information, operational errors and fraud. To mitigate these errors, we are implementing several actions as the application of a digital solution that will help address financial and ESG challenges in statutory reporting. This will enable greater data traceability, real-time mapping of received information, clear data ownership, completed and pending processes, among other benefits.

2.5. Impacts, risks and opportunities management and double materiality assessment

[ESRS 2 SBM-1, ESRS 2 SBM-3, ESRS 2 IRO-1, ESRS 2 IRO-2]

[GRI 2-25, GRI 3-1, GRI 3-2 e GRI 3-3]

The Jerónimo Martins Group primarily operates in the food sector, promoting safe, healthy, and affordable food solutions and products through its Companies and Private Brands. Respect for all stakeholders and a commitment to sustainable development principles are integral to its growth and value creation strategy. This approach aims to contribute to the prosperity, cohesion, and well-being of the communities served by its businesses in the short, medium and long term. For detailed information about the strategy, business model and value chain of the Group please refer to chapter 1 "The Jerónimo Martins Group", chapter 2 "Management Report – Creating Value and Growth" and chapter 4 "Corporate Governance". Information on the breakdown of total revenue by significant ESRS sector is provided in note 3.2. "Segments reporting" in chapter 3 "Financial Statements".

In 2023 we conducted our first double materiality assessment, in accordance with the preliminary version of the requirements established by the EU's Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). This process began with the identification of a preliminary list of potential material topics and their impacts, risks and opportunities (IROs). A stakeholder consultation was then carried out to collect input on Jerónimo Martins' impact on different sustainability topics.

This assessment gathered information from more than 16,600 stakeholders from nine different groups⁸, in Poland, Portugal and Colombia, to assess the impact materiality along our value chain, considering both severity (scale, scope and irremediability of the impact) and likelihood of occurrence. In addition to the input from these stakeholders, the impact matrix also considered internal and external expertise. Material financial issues were identified using the Group's risk management system⁹. The assessment considered risks and opportunities along the value chain, based on their magnitude (potential financial impact on sales and costs) and likelihood of occurrence. Once completed, the assessment was also validated by senior managers and members of the Executive Management Team¹⁰. Based on the findings, the material topics and sub-topics were identified and the mandatory sustainability disclosure requirements for the Group's 2023 Annual Report were outlined.

In 2024 we reviewed the assessment in accordance with the final version of the ESRS¹¹ and the final versions of the implementation guidance published in May 2024 by EFRAG (European Financial Reporting Advisory Group). Stakeholders were not consulted again in 2024, but the findings of the 2023 financial year were taken into account. The IROs were again assessed and complemented with desk research and benchmark analysis. A total of 145 IROs were identified in this review, broken down as follows:

⁸ Responses were collected from the representatives of nine groups: employees, consumers, suppliers and service providers, non-governmental organisations, private charities, analysts and investors, the media, sectoral associations, insurance companies, and opinion makers. For more details on the ways in which we relate to our stakeholders, visit the "Our Stakeholders" page on our [website](#).

⁹ For more information, see chapter 4 "Corporate Governance", section C "Internal Organisation", subsection III "Internal Control and Risk Management".

¹⁰ For more details on the 2023 financial year, please see the [2023 Annual Report](#).

¹¹ Published on 22 December 2023 in the Official Journal of the European Union.

Total Impacts, Risks and Opportunities considered

Impacts, risks and opportunities	Total	Direction		Occurrence		Time horizon			Value chain relevance*		
		Positive	Negative	Actual	Potential	Short-term	Medium-term	Long-term	Upstream	Direct operations	Downstream
Impacts	62	31	31	38	24	24	20	6	43	61	29
Risks	47	n.a.	n.a.	n.a.	n.a.	11	26	10	24	47	11
Opportunities	36	n.a.	n.a.	n.a.	n.a.	11	18	7	17	36	15

* The same IRO may be identified (fully or partially) for different levels of our value chain, therefore justifying sums above the total.

The evaluation of the IROs considered different time horizons (short, medium and long term) and the stage of the value chain in which they may occur. Of the 145 IROs analysed, 21 were evaluated as material. A total of 35 environmental, social and governance (ESG) sub-topics were identified, 10 of which were considered material to Jerónimo Martins, according to our internal thresholds, namely the ranges applicable to our Enterprise Risk Management processes.

Impacts, risks and opportunities associated with material topics for Jerónimo Martins

Topic	ESRS topic	Material sub-topic	Impacts		Risks	Opportunities	Material requirements
			Positive	Negative			
Environment	Climate change	Climate change	0	1	0	0	E1-1 to E1-9
	Circular economy	Packaging redesign for sustainable resource use	0	1	0	0	E5-1 to E5-3 E5-5
		Food waste	0	0	0	1	E5-1 to E5-3 E5-5 and E5-6
Social	Own workforce	Labour rights and working conditions	0	0	1	1	S1-1 to S1-11 S1-14 to S1-17
		Employee learning and development	0	0	1	2	S1-1, S1-4, S1-5 and S1-13
	Affected communities	Engagement and supporting local communities	2	1	0	0	S3-1, S3-2, S3-4 and S3-5
	Consumers and end-users	Product and services innovation	0	0	1	1	S4-1, S4-4 and S4-5
		Product affordability	0	1	1	1	S4-1 to S4-5
		Product safety and quality standards	1	0	1	1	S4-1, S4-2, S4-4 and S4-5
Governance	Business conduct	Sustainable and responsible criteria in the supply chain	2	0	0	0	G1-1, G1-2 and G1-6

As a result of this exercise, the following material topics were identified:

2024 Double Materiality Matrix



Note: Material topics resulting from the application of the cut-off threshold.

Below are the ten most material topics identified in 2024 as a result of the consolidated double materiality assessment:

- Product safety and quality standards
- Product affordability
- Sustainable and responsible criteria in the supply chain
- Labour rights and working conditions - own workforce
- Food waste
- Product and services innovation
- Climate change
- Packaging redesign for sustainable resource use
- Employee learning and development
- Engagement and supporting local communities

Like in 2023, the topics "Product safety and quality standards" and "Product affordability" were considered the most relevant both from an impact and financial point of view (risks and opportunities).

The topics identified directly by the consulted stakeholders (impact materiality) and which are included in our double materiality matrix are:

- Sustainable and responsible criteria in the supply chain
- Packaging redesign for sustainable resource use
- Employee learning and development
- Engagement and supporting local communities

The risk assessment highlighted the topics "Labour rights and working conditions - own workforce"¹², "Food waste", "Employee learning and development" and "Product and services innovation" as those with the greatest potential to have a positive or negative financial impact on the Group's business.

We intend to repeat this assessment every three years. In the interim, and where required, adjustments will be made to ensure the assessment is kept current.

¹² The 2023 topic "Compensation and benefits" was integrated into "Labour rights and working conditions - own workforce" to align nomenclature with the sub-topics included in the ESRS.

2.6. Our policies

[ESRS 2 MDR-P]

In the table below you can find a set of sustainability-related policies. Detailed information can be found [here](#).

Adapted table

Policy	Description of key contents	Most Affected Stakeholders
Code of Conduct	Outlines the purpose, ethical principles, and values that govern the Group's operations and relationships with stakeholders. It is directed towards all employees, clients, suppliers, business partners and investors. The Code of Conduct encompasses four fundamental principles: Respect for the Law and Human Rights, Honesty and Integrity, Diversity and Inclusion, and Corporate Social Responsibility.	Employees Consumers Suppliers Business partners Investors Local communities Non-governmental organisations and associations Journalists
Environmental Policy	Prioritizes respect for the environment in the Group's business growth and development, including the commitment to promoting sustainable production, distribution, and consumption practices by continuously improving the efficiency and effectiveness of the supply chain. The policy integrates environmental performance criteria into operations and management decisions, encourages eco-efficiency and eco-innovation, and actively promotes the participation in multistakeholder initiatives. Key priorities include tackling climate change, protecting water resources, preserving biodiversity, and accelerating the transition to a circular economy. The Group aims to reduce energy consumption, greenhouse gas emissions, and waste, while enhancing water quality and availability. The policy states that all initiatives must be regularly monitored, evaluated, and reported to ensure compliance with applicable legislation and continuous improvement.	Employees Suppliers Business partners Local communities
Anti-Corruption Policy	Sets forth the principles and obligations outlined in the Code of Conduct, which must be adhered to in the workplace and in interactions with suppliers, customers, and other external entities to prevent corruption and avoid potential conflicts of interest. This policy is applicable to all Jerónimo Martins Group's companies and their associates, regardless of contractual relationship, job position, or country of operation. In line with the Group's Code of Conduct, the policy details the communication channels available and establishes that reports of potential breaches made in good faith will not lead to retaliation, reprimand, or any other adverse or discriminatory actions.	Employees Suppliers Business partners Governments Local communities Non-governmental organisations and associations Journalists
Sustainable Sourcing Policy	Aims to establish a sustainable approach by incorporating social and environmental concerns into the supply chain, with the goal of gradually and sustainably contributing to positive impacts, and mitigating actual or potential negative impacts of the Group's activities. This policy focuses on ensuring food quality and safety, offering fair prices, promoting responsible consumption, supporting social wellbeing, and contributing to the sustainability of ecosystems and communities. The Group emphasizes rigorous supplier selection, fostering long-term ethical relationships, and encouraging good environmental practices. Committed to complying with legislation and protecting biodiversity, the policy aligns with the UN's priority areas to ensure ecosystem services and population well-being.	Employees Suppliers Business partners Local communities Consumers

Policy	Description of key contents	Most Affected Stakeholders
Suppliers Code of Conduct	Sets forth the ethical standards and principles that suppliers must follow in their business dealings with the Group. It emphasizes the importance of promoting efficiency, customer satisfaction, shareholders' interests, and sustainable development. Suppliers are expected to uphold high standards in labor practices, environmental protection, and product quality and safety. The Code mandates compliance with laws and international treaties, environmentally conscious business practices, and adherence to the highest standards of product quality and safety. It also requires suppliers to comply with labor laws, ensuring the principles of non-discrimination, no forced or child labor, safe and healthy work environment, fair remuneration and compliance with legal working hours, along with respect for workers' freedom of association. Additionally, suppliers must not offer personal gifts or benefits to Jerónimo Martins' employees, except for symbolic gifts up to a pre-defined value. This comprehensive Code ensures that suppliers align with the Group's commitment to ethical and sustainable business practices.	Employees Suppliers Business partners Local communities Consumers
Policy of Support for Surrounding Communities	Emphasizes the importance of extended responsibility and active contribution to the well-being of the communities where the Group operates. This policy focuses on promoting Humanity, Merit, Enterprise, and Citizenship. It supports projects aimed at fighting malnutrition, hunger, poverty, and social exclusion, particularly among the elderly and deprived children and young people. Support is provided through donations of shopping vouchers for food and hygiene products, as well as initiatives to reduce early school leaving and encourage entrepreneurship. The policy also considers supporting scientific research related to health through food and preserving cultural and environmental heritage. It outlines that all support measures are monitored and assessed to ensure resources are effectively allocated to make the greatest impact.	Employees Non-governmental organisations and associations
Nutritional Policy	Promotes healthy lifestyles through safe, nutritious, and accessible food offerings, focusing on preventing food-related diseases like obesity and diabetes. This includes ensuring product safety, compliance with legislation, offering a variety of healthy products, and providing clear, reliable information to consumers. The policy is based on six pillars: nutritional profile, ingredients, labeling, portion sizes, continuous improvement, and communication. The document also promotes the engagement in responsible marketing, especially towards children, and the continuous improvement of products' nutritional profiles. The policy emphasizes that actions must be monitored to assess their impact and accuracy.	Suppliers Consumers
Product Quality and Safety Policy	Commits to ensuring the highest standards of product quality and safety for Private Brand and Perishables products. The policy focuses on maintaining competitive prices while establishing long-term partnerships with suppliers, ensuring relevant quality management and safety certifications schemes. Key goals include understanding and meeting client demands, monitoring and optimizing internal processes, fostering innovation, maintaining the reputational capital of the brands, controlling product quality, training human resources, strengthening partnerships with suppliers, cooperating with authorities and the scientific community, developing information mechanisms for customers, fulfilling legal and regulatory requirements, continuously improving the Quality Management System, ensuring product safety for human and animal health, and minimizing environmental impacts. The policy also includes specific principles such as legal compliance, engaging with stakeholders, applying rigorous quality and safety standards based on scientific evidence, and ensuring product safety through legal and scientific support. The Group commits to practices like prohibiting animal testing except in specific cases, such as sensorial tests for animal feed, adopting a conservative approach to GMOs and ensuring transparency in labeling, avoiding the use of nanotechnology in food products and packaging, reformulating products to eliminate microplastics, complying with safety standards for substances of concern and packaging materials, implementing procedures and traceability to ensure product safety, and clearly communicating product information to consumers.	Suppliers Consumers

Policy	Description of key contents	Most Affected Stakeholders
Personal Data Protection Policy	Ensures the privacy of personal data for all individuals interacting with Jerónimo Martins' Companies, including customers, employees, suppliers, and partners. Sets the necessary measures to protect personal data and complies with data protection legislation across all its operations through a dedicated Privacy Team and Data Protection Officers that are in place to develop, implement, and verify data protection procedures. The statement makes sure that personal data is processed lawfully, fairly, and transparently, only for legitimate purposes that are clearly communicated to data subjects. Therefore, it guarantees that data is processed for specific, legitimate purposes and retained only as long as necessary. The policy also ensures data minimization, accuracy, integrity, and confidentiality through robust security measures and careful partner selection. In addition, it states that data protection principles are integrated into new projects from the start, involving the Data Privacy Team to mitigate risks. It also contemplates the right that subjects have over the control about their personal data, namely rights to access, rectify, oppose, port, limit, and erase data, facilitated through our dedicated channels.	Shareholders and investors Analysts Official bodies, supervising entities and local authorities, Suppliers and business partners Employees Consumers Local Communities Journalists Non-governmental organisations and associations
Whistleblowing Policy	Outlines rules for receiving, recording, and handling reports of irregularities within the Company. It ensures effective mechanisms for detecting and preventing irregularities, promotes a culture of transparency, integrity, and responsibility, and encourages ethical, honest, and professional behavior among employees and leaders. It also ensures compliance with EU law, national law, and the Company's Code of Conduct, and supports effective risk management. The policy defines who is considered a whistleblower, what themes are considered irregularities, and what can constitute a motive for reporting. It establishes principles of complete privacy, confidentiality throughout the entire process, and the principle of non-retaliation. From a procedural point of view, it outlines the steps of the entire reporting process - from the complaint to the communication of the result through internal and external whistleblowing mechanisms - and explains how data is recorded and managed.	Shareholders and investors Analysts Official bodies, supervising entities and local authorities Suppliers and business partners Employees Consumers Local Communities Journalists Non-governmental organisations and associations
Labour Fundamentals Guidelines	Aims to promote employees' labour and human rights, inspiring the Group, Corporate Areas and Companies, to build a healthier, safer and balanced working environment. These Guidelines have the following objectives: i) Clarify the global international fundamental principles that directly apply to Jerónimo Martins' Companies in terms of Human Resources Management; ii) Set the standard behaviour and main guidelines of conduct for all Jerónimo Martins' Companies; iii) Act in compliance with the international legislation and principles in the areas of human rights, labour and human resources management, when adopting internal policies, procedures, practices, initiatives or other equivalent actions; iv) Guarantee and promote that all Companies adopt a mechanism (e.g.: specific communication channels) that allow employees to share and / or report any request or complaint. With these guidelines, we reinforce the following principles and rights: <ul style="list-style-type: none"> • principle of equality and non-discrimination; • right to work; • right to rest; • right to equal pay and fair remuneration; • right of association and collective bargaining; • right to a safe workplace; • right to parenthood; • right to privacy and private life; • right to remedy. 	Employees Official bodies, supervising entities and local authorities Shareholders and investors Analysts

Policy	Description of key contents	Most Affected Stakeholders
Prevention and Combat to Harassment and Discrimination Guidelines	Aims to formalize the principles of equality and non-discrimination defined in the Group's Code of Conduct and the principle of prevention of harassment in the workplace, which are intolerable behaviors that are important to prevent, combat and, if necessary, sanction appropriately, namely by: i) establishing rules aimed at preventing and responding to behaviors that constitute discrimination and/or harassment, in any form, in the workplace and/or for work-related reasons; ii) establishing contact channels between employees and their Companies in this context; iii) establishing the main guidelines for the analysis and investigation process of complaints received.	Employees Official bodies, supervising entities and local authorities Shareholders and investors Analysts
Recruitment and Selection Policy	Defines recruitment rules and guidelines to attract and select the right candidates, both internally and externally, according to the Group's recruitment needs, and to provide an exceptional candidate and employee experience, reinforcing Jerónimo Martins' brand value as a Benchmark Employer, in all countries we are and want to be present. The recruitment and selection processes established in this policy are therefore based on promoting and complying with criteria of ethics, fairness, non-discrimination and equal opportunities at all levels of our organisation. The recruitment and selection teams ensure that profiles are analysed impartially and must apply preestablished criteria relating to experience and qualifications, among others, at every stage of the process. They also ensure compliance with the law, regulations, and risk and privacy management rules, observing the requirements of each country, in particular with regard to the minimum working age.	Employees Candidates and potential candidates Suppliers and business partners
Global Training Policy	Defines rules and guidelines for the identification and implementation of the appropriate training solutions in the different locations where Jerónimo Martins, and different Companies that belong to the Group, are present. It establishes the following objectives, among others: i) ensure a strong alignment between training plans, Companies' goals and JM Group's strategy; ii) align training concepts and define the training macro-process that should be complied by all Companies and by the Corporate structure in regards to training activities management; iii) establish high-quality standards of training solutions.	Employees Suppliers and business partners
Performance Management Policy	Defines the process, main rules and guidelines regarding managers' performance management and alignment with business goals, and aims to promote a meritocratic and results-driven culture, based on regular feedback and people development. Aims to ensure that performance and each manager's individual contribution are aligned with business goals and the Group's Values and expected behaviours.	Employees

Policy	Description of key contents	Most Affected Stakeholders
Occupational Health and Safety Policy	Defines the guiding principles for the development and implementation of processes and best practices, guaranteeing compliance with the legislation, and contributing to maintain a safe and healthy work environment for employees, customers, service providers, suppliers and communities. More information about our Occupational Health and Safety policies can be found in the sub-chapter 4. "Social information", section 4.2. "Managing social topics", sub-section 4.2.1. "Own workforce", point "Health and safety at work", from this chapter.	Employees Customers Suppliers and business partners Local communities Official bodies, supervising entities and local authorities
Engagement Policy	Aims to promote an organisational culture that fosters high levels of engagement and performance in the Group. Under a knowledge-based engagement methodology, Jerónimo Martins measures and monitors employees' engagement. The Engagement Policy has the following objectives: i) Build a culture of engagement and commitment to the Group's Vision, Mission and Values, Strategy and Goals; ii) Deliver a channel, available to all employees, that can assess organisational engagement; iii) Act as a Corporate and Companies advisor by delivering key insights that derive from the engagement results; iv) Support the identification and implementation of strategic initiatives that leverage the culture of engagement and high performance; v) Reinforce Jerónimo Martins' brand value as an employer of reference.	Employees

For all policies and codes, the most senior level in the organization accountable for their implementation is the Group's Chief Executive Officer. Most of the documents stated above are publicly disclosed in our [website](#) and [here](#). However, some policies and guidelines are internal and fall under the Group's claim of omission of information due to "intellectual property, know-how, or the results of innovation", as described in the ESRS.

2.7. Commitments

[ESRS 2 MDR-M; ESRS 2 MDR-T]

Sustainability targets for the Group and its Companies have been defined taking into account its corporate responsibility strategy, including the policies that support it, and the outcomes of its Double Materiality Assessment, with targets being set to address each material topic identified. The definition of the targets was done in straight liason with each of the Companies' Sustainability Committees through dedicated meetings held for this purpose. For detailed information on our targets and their progress, please refer to sub-chapter 6. "Sustainability commitments", on this Chapter.

3. Environment information

3.1. Our environmental-related policies

[ESRS 2 MDR-P; E1-2; E2-1; E3-1; E4-2; E5-1]

[GRI 2-16; GRI 2-23; GRI 2-24; GRI 2-25; GRI 2-26]

As experts in the sale of fresh produce, including meat, fish, fruit and vegetables, our daily activities depend on and impact the ecosystems from which many of these products are sourced. Major environmental challenges such as climate change, biodiversity loss, the use of natural resources, and pollution can impact global production capacity and the quality of life of societies. Several international agreements and targets have been established, such as the Paris Climate Agreement and the United Nations Sustainable Development Goals, which introduce and influence regulatory changes that impact the way countries and companies conduct their activities. Reducing environmental impacts and restoring biodiversity are just two of the objectives.

Integrating all these variables into a business model can bring economic and social benefits. Besides reducing the risk of non-compliance by our businesses, adopting sustainable practices, such as efficient waste management, reducing energy and water consumption, and fighting food waste, can improve operational efficiency. Some of these initiatives can include investing in projects to conserve natural habitats, choosing suppliers with better agricultural and food production practices, reducing food waste, promoting healthier and more sustainable diets in our offer or contributing to a circular economy.

At the Jerónimo Martins Group, our management of environmental challenges is governed by the following policies and codes:

- Environmental Policy
- Sustainable Sourcing Policy
- Product Quality and Safety Policy
- Code of Conduct
- Code of Conduct for Suppliers

A detailed description of these policies can be found in subchapter 2. "General disclosures", section 2.2. "Governance and strategy", of this chapter. These documents are also available on our [website](#).

3.2. Managing environmental topics



3.2.1. Climate change

Managing climate-related risks and opportunities

[ESRS 2 SBM-3]

The assessment and management of climate-related risks and opportunities are key elements of our [Climate Transition Plan](#). The plan sets greenhouse gas (GHG) reduction targets and lays out our decarbonisation strategy, supported by a number of initiatives by our Companies in their own operations and, through close collaboration with suppliers, also in their supply chains. In May 2024, the Science Based Targets initiative (SBTi) validated our proposed GHG reduction targets, reflecting our commitment to fighting climate change.

The growing challenge that climate change poses to society and businesses, and the complexity of assessing the associated financial risks and opportunities, led to the adoption in 2020 of the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), now integrated into the standards of the International Sustainability Standards Board (ISSB), managed by the International Financial Reporting Standards (IFRS). In 2024, the updated assessment of our climate-related risks and opportunities took into account the latest data published by the Intergovernmental Panel on Climate Change (IPCC), in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD).

The short-, medium- and long-term assessment of climate-related risks and opportunities is part of an ongoing process that covers the value chain of the Group's Companies with a turnover of more than 100

million euros (accounting for 99.95% of total turnover) and involves Private Brand and perishables suppliers. This assessment is carried out to enhance supply chain resilience, reduce carbon emissions, and identify potential business opportunities in primary production and in the use of low carbon technologies.

In 2024, the goals of the assessment and management of risks and opportunities included:

- updating the modelling of climate risk scenarios used;
- increasing knowledge of the supply chain's carbon footprint by involving the Companies' main suppliers, enabling the sharing of information and the identification of opportunities to reduce GHG emissions;
- improving the assessment of specific risks for some ingredients, in particular fruit and vegetables, and the use of water resources on Jerónimo Martins Agro-Alimentar (JMA) agricultural and livestock farms.

Governance

[ESRS 2 GOV-3]

Our decarbonisation strategy and management of climate-related risks and opportunities is monitored and supported by the Board of Directors, ensuring that climate-related topics are integrated into the corporate strategy, in particular the sustainability strategy, both in our own operations and in the supply chain. Executive responsibility rests with the Group's CEO, who is also Chairman of the Board and of the Committee on Corporate Governance and Corporate Responsibility (CGSRC). More information about these bodies is provided in points 21 and 29 of Chapter 4 "Corporate Governance" of this report.

Topics linked to climate-related risks and opportunities are discussed in regular meetings held by the Sustainability Committees of each of our Companies and by the CGSRC, which assists the Board of Directors in assessing and submitting proposals on the corporate responsibility strategy. Climate change mitigation and adaptation and the GHG emission reduction targets set out in the [Climate Transition Plan](#) are included in these proposals.

The Board of Directors also defines the Group's risk management policy and objectives. Climate-related risks, incorporated into the environmental risks of our risk management nomenclature, are integrated into the Group's multidisciplinary management process. A detailed description of our risk management mechanisms, including environmental risks, is provided in points 52, 53 and 54 of Chapter 4 "Corporate Governance" of this report.

The approval in 2023 of net zero emissions targets and of short- and long-term reduction targets, together with the decision to allocate an estimated annual average of 10% of total consolidated CapEx to the implementation of those targets are just two recent examples of climate integration in the Group's governance mechanisms.

Climate-related issues are central to our corporate responsibility strategy and are integrated into our business strategy. The implementation of our climate commitments is underpinned by ongoing investments, with execution cycles aligned with the business plan, including:

- the installation of photovoltaic systems for self-consumption of renewable electricity in Poland, Portugal and Colombia;
- the use of natural refrigerant gases in cooling and freezing units and equipment;
- the purchase of certified renewable electricity to power our operations in Portugal and Poland (OpEx).

The achievement of climate-related and other corporate responsibility objectives is part of the incentive scheme for employees in roles that influence the definition and/or implementation of the Company's climate commitments and targets. The ways in which we integrate sustainability-related performance into the employee incentive schemes are detailed in subchapter 2. "General Disclosures", section 2.2. "Governance and strategy", of this chapter.

Our strategy

[ESRS 2 MDR-A, ESRS E1-3]

As a food retailer with operations in the agri-food sector, we depend substantially on favourable climate conditions throughout our value chain, particularly in the natural cycles of primary production, which also depend on ecosystem services. Weather conditions can have an impact on our food and non-food supply chain, in what regards, for instance, the availability of water for agriculture, constrains in logistic processes caused by delays and blockages in transport routes related with landslides, and also on the risk of flooding of stores and distribution centres.

We recognize the impact of our direct business activities and of those developed in our supply chains on GHG emissions, which contribute to climate change. Our mitigation and adaptation strategy on climate change aims to reduce physical and transition risks by sustainably reducing GHG emissions in our own operations and in our supply chain, which we do by involving suppliers in our decarbonisation roadmap. This close collaboration has allowed us to integrate into our assessment the mitigation and adaptation actions already implemented by our suppliers for ingredients with a high climate risk.

In line with a GHG reduction trend that limits the rise in average temperature to 1.5°C, our plan includes intervention measures in own operations (distribution centres, stores, industrial units and farms – all of which are also referred in this report as establishments), in logistics, in sourcing - together with our suppliers (especially of food products) -, and for consumers. We also monitor the possible availability of alternative products with lower carbon emissions.

Initiatives to reduce GHG emissions in own operations

Initiative	Target	Actions
Transition to natural and low Global Warming Potential (GWP) refrigerant gases.	By 2030, use only natural or low GWP refrigerant gases in all stores and distribution centres in Poland and Portugal, and in Colombia by 2035.	<ul style="list-style-type: none"> • Replace or retrofit refrigeration systems with natural or low GWP refrigerant gases (e.g. R290 [propane], R717 [ammonia] and R744 [carbon dioxide]). • Reduce leaks in refrigeration systems.
Transition from fossil fuels.	Increase the electrification of the light vehicle fleet and the use of biofuels.	<ul style="list-style-type: none"> • Increase the proportion of electric and/or plug-in hybrid vehicles in our light vehicle fleet and increase the use of biofuels and hydrogen. • Progressively reduce the use of fossil fuels in operations by electrifying equipment and/or using biofuels.
Transition to renewable energies	By 2030, ensure that 60% of electricity used is from renewable sources.	<ul style="list-style-type: none"> • Increase the number of establishments with onsite self-consumption renewable energy generation. • Purchase of onsite and off-site renewable energy through power purchase agreements (PPA) or virtual power purchase agreements (VPPA). • Purchase of Guarantees of Origin (GO).
Increase the energy efficiency of our establishments.	By 2026, reduce energy consumption by 10% compared to 2021 (per €1,000 of sales).	<ul style="list-style-type: none"> • Build and refurbish establishments with increased overall efficiency, particularly in refrigeration, lighting and HVAC (heating, ventilation and air conditioning) systems and equipment. • Promote the daily adoption of good practices by employees.

Progress made on these actions, as well as the other GHG reduction targets, is detailed in subchapter 6. "Sustainability Commitments" of this chapter.

Alongside our commitment to reduce scope 1 emissions (from own operations) and scope 2 emissions (from the energy we buy), we are also committed to reducing emissions associated with upstream and downstream activities (scope 3). For many organisations, including us, the biggest source of GHG emissions is associated with the production, use and end-of-life of products sold in stores. For a food retailer, emissions from purchased goods are influenced by industrial production practices and the agricultural practices associated with food sold as final products (e.g. vegetables) or incorporated as ingredients in Private Brand products (e.g. soy in vegetable oils). That is why we have implemented various initiatives to reduce the emissions associated with these practices, in particular those associated with

changes in land use, such as deforestation related to the conversion of areas for agricultural production. Initiatives of note in our supply chain include:

- public commitments to ensure that we are not associated with deforestation or the conversion of high conservation value ecosystems linked to the production of some of the main commodities (palm oil, soy, paper/wood and beef);
- supporting our fruit and vegetable suppliers in adopting sustainable agricultural practices;
- promoting sustainable energy use;
- optimising distribution routes and increased investment in more efficient transport solutions;
- fighting and reducing food waste;
- promoting the ecodesign of packaging;
- fighting plastic pollution.

Given the inevitability of some climate change effects, we strive to improve business resilience by promoting adaptation measures in our own operations and in the supply chain. We do this by sharing good practices and identifying alternative origins or products.

Risk assessment also allows us to identify opportunities in our own operations to reduce our carbon footprint and increase our energy production capacity (such as the generation of renewable energy for self-consumption), or develop innovative low carbon products that meet the expectations and needs of our consumers.

Managing climate-related risks and opportunities

[ESRS 2 SBM-3; ESRS 2 IRO-1; ESRS E1-9]

Despite the high degree of uncertainty associated with assessing the impact of climate risks, the process is similar to that implemented for managing other risks and is based on our general risk management framework, which includes risks and opportunities in all stages of our value chain:

- upstream (e.g. the impact of changing precipitation patterns on global food supply chains);
- own operations (e.g. the impact on CapEx of replacing cooling systems);
- downstream (e.g. the opportunity to increase investor confidence through optimised management of climate-related financial risks and opportunities or the reduction of GHG emissions in our value chain).

The identification, assessment and management of climate-related risks and opportunities is part of an integrated corporate risk management process, in line with ISO 31000, and includes a Risk Exposure Matrix with four levels calculated on the basis of two dimensions: probability and impact, for which we use four metrics (sales, EBITDA, safety and reputation) according to the type of risk or opportunity.

Risks and opportunities are considered material when exceed a potential variation of 5% in sales (set as the materiality threshold) considering its inherent risk¹³. These cases are identified, assessed and managed at corporate level. Where they fall below that threshold (up to 5% of sales) they are identified and assessed at corporate level and managed at Company level.

Identification includes monitoring country-specific regulations (e.g. carbon taxes in Portugal, Poland and Colombia), a detailed assessment of the vulnerability of facilities to extreme weather events (e.g. flood risk mapping of stores and distribution centres in the countries where we have operations) and an analysis of market trends, in particular our consumers' preferences (e.g. preference for local products, choice of low carbon or flexitarian products).

More information about these measures is provided in points 52, 53 and 54 of Chapter 4 "Corporate Governance" of this report.

Climate-related financial risks and opportunities were assessed over different time horizons – short, medium and long term – and selected according to their materiality. There are two types of climate-related financial risks:

- physical (acute and chronic);

¹³ Inherent risk is the level of risk without considering response strategies to a given climate-related risk (physical or transition).

- transition (including political, regulatory, market, technological and reputational risks).

Risks assessed

Type of risk	Risk category	Value chain stage	Climate risk
Physical	Acute	Production	• Extreme heat or cold.
		Processing	• Extreme heat or cold.
		Logistics	• Strong winds.
		Establishments	• Extreme heat or cold.
	Chronic	Production	• Temperature variation. • Water shortages. • Change in precipitation patterns.
		Logistics	• Rise in average sea level. • Resilience of ports.
		Establishments	• Rise in average sea level.(e.g. coastal flood risk).
Transition	Market	Processing	• Energy transition.
	Technological	Establishments	• Energy transition. • Compliance risk and replacement of refrigerant gases.
	Reputational	Consumer/Community	• Changes in consumer preferences. • Increased concern from stakeholders about climate performance.

The universe of climate-related risks, as well as the quantification and disclosure of financial risks and opportunities, are being updated to incorporate the latest information from climate projection models.

Climate-related risks are identified based on quantitative scenarios using projections from the Intergovernmental Panel on Climate Change (IPCC), the International Energy Agency (IEA) and other databases (e.g. FAO - Food and Agriculture Organisation of the United Nations). This information allows us to assess the dependence of our Companies' sales on products containing climate-vulnerable ingredients.

In 2020, we considered the four main stages of the value chain (primary production, processing, logistics and our establishments) and selected the 30 most relevant product groups for the Companies, together with its main ingredients and its origins, totalling 45 ingredients and 24 origins. This selection involved analysing more than 40 items to obtain a representative sample of the Group's products, countries of origin and locations where we operate. Climate-related risks and opportunities were identified and assessed for each ingredient and main origin.

In 2024 we revisited the selected products and increased the number of items subject to assessment of climate-related financial risks and opportunities to 50.

The assessment of the different categories of physical and transition risks has been updated for the short-term, 2030, medium-term, 2040, and long-term, 2050 time horizons, in line with our climate transition plan and according to the latest models in the [Sixth IPCC Report](#), which combine climate (Representative Concentration Pathways) and socio-economic (Socio-economic Pathways) scenarios:

- SSP1-1.9 (<1.5°C), "sustainable pathway", considers a growth scenario focused on sustainability with rapid emission reductions to limit average temperature increase to 1.5°C, in line with the goals of the Paris Agreement;
- SSP2-4.5 (2-3°C), "middle-of-the-road", assumes socio-economic factors follow their historic trends and a rise in average temperature below 2.0°C in an intensive mitigation scenario;
- SSP5-8.5 (>4°C), "fossil fuel-rich development", projects rapid and unsustainable growth in the economy and energy use and a rise in average temperature of between 4.0°C and 6.1°C, assuming that efforts to limit the rise in average temperature fail.

Since 2020, all climate-related physical and transition opportunities and risks that are considered material have been assessed annually.

Identifying risks and opportunities

[ESRS 2 SBM-3; ESRS 2 IRO-1; ESRS E1-3; ESRS E1-9]

In 2024, the assessment of risks and opportunities in our operations covered more than 6,000 establishments (stores, distribution centres, head office buildings, central kitchens and industrial units) in the six countries where we do business (Poland, Portugal, Colombia, Morocco, Czechia and Slovakia). It focused on the most frequent physical risks in our operations and on boosting opportunities related to the energy transition and the use of natural or low GWP refrigerant gases.

Risks and opportunities considered in our strategy

Risks and opportunities	Time horizon*	Impact	Value chain stage	Description
Physical risk: Flooding	Short and medium term	Reduced sales and higher CapEx	Establishments	Besides material damage to infrastructure and the temporary closure of stores, coastal and river flooding can cause loss of inventory and costs associated with repairing equipment in our establishments.
Physical risk: Rising sea levels	Long term	Reduced sales and increased logistics costs	Logistics	Disruption to the operation of seaports due to rising sea levels may result in temporary disruptions in the delivery of certain products to our establishments.
Physical risk: Water shortages	Short and medium term	Reduced sales and higher CapEx	Production Establishments	Water scarcity can lead to a reduction in agricultural productivity, requiring investment in increasing water efficiency and building water storage systems.
Physical risk: Extreme heat	Short term	Higher CapEx and OpEx	Establishments	Prolonged periods of high temperatures (e.g. heatwaves) can put pressure on refrigeration and air conditioning systems, increasing the risk of critical failures and energy consumption, and intensifying the need for maintenance or to replace equipment.
Physical risk and market opportunity: Energy transition	Short term	Lower OpEx and GHG emissions and higher CapEx	Processing Establishments	Investing in renewable energy production systems for self-consumption (e.g. photovoltaic panels on the roofs of establishments) reduces exposure to fluctuating energy prices and reduces GHG emissions. On the other hand, low carbon technologies require high investment. The energy transition will have a particular impact on investment costs for 1.5°C climate scenarios (SSP1 - 2.6).
Transition risk: Regulatory	Short term	Higher CapEx	Establishments	The use of high GWP refrigerant gases is an example associated with regulatory risks. Because these gases can cause significant environmental impacts in the event of a leak, they are subject to phase-out regulation in several countries. This can increase the investment needed to replace or modernise refrigeration and air conditioning equipment that runs on natural or low GWP refrigerant gases.

* Assessment of the different categories of physical and transition risks has been updated for the short-term, 2030, medium-term, 2040, and long-term, 2050, in line with our climate transition plan.

Given the growing pressure on water resources, we reassessed the level of water stress associated with the location of our Companies' establishments, in particular JMA farms. Our agri-food production area relies heavily on water resources, namely for animal watering and irrigation. We used the latest version (2023) of the Aqueduct Water Atlas, a World Resources Institute tool that aggregates information on current and projected water scarcity for different time horizons, according to different climate scenarios. Locations classified as being of "high" or "extremely high" risk were deemed material.

JMA drew up a Water Management Plan following this reassessment. This plan fulfils the commitment to define and implement a mitigation and adaptation plan to improve efficiency in water use and manage water scarcity during periods of low precipitation at the Company's farms. The plan also establishes the main actions for monitoring and managing water efficiency, and sets targets for reducing consumption and controlling water quality, in a continuous improvement effort which includes public disclosure of the progress made.

In order to reduce the impact on water resources without jeopardising production, JMA has implemented several mitigation measures, including:

- rainwater harvesting for cooling, washing and irrigating outdoor spaces;
- using pond water for animal watering;
- drip irrigation systems;
- nighttime irrigation.

Detailed information about the exposure of own operations to these risks is provided in section 3.2. "Managing environmental topics", subsection 3.2.3. "Water and marine resources", point "Water consumption", of this subchapter.

Assessment for the 2030 and 2040 periods showed that the risk associated with rising sea levels or inland flooding does not have a material impact for the business. The coastal and river flood risk climate models offered by the WWF Water Risk Filter tool were used for this assessment.

Having regard to the long-term projections, which indicate a rise in sea levels of between 0.5 and 1 metre by 2100, the impact of this risk on coastal areas will continue to be monitored periodically in order to identify high-risk areas for our Companies' businesses. Quantifying the flood risk in periods of heavy rainfall is complex due to the uncertainty of the results of climate scenarios. Despite the increase in flood frequency and intensity, the number of stores affected in recent years has been very small. Our establishments have drainage systems and levels of adaptation to the occurrence of floods, especially those caused by heavy rainfall. One such mitigation measure is the construction of distribution centres in Colombia above the average sea level rise line and with a slope to harvest surface runoff, which is then used for secondary activities such as washing floors and watering green spaces.

We monitor the impact of potential sea level rises on our logistics processes by studying the risk associated with the seaports used by the freight carriers we use in the different countries.

We also monitor the state of implementation of national climate action and adaptation plans, especially in Colombia, where there are port infrastructures in higher risk regions, as well as the plans of several countries for strategic ports in regions where we have identified new products or alternative products to those at risk in their production regions.

Although the risk identified in our infrastructures does not have a material impact, we closely monitored the occurrence and magnitude of recent extreme events, such as the September 2024 floods in southern Poland and the major wildfires in central and northern Portugal, also in September 2024.

As regards the energy transition in the countries in which we operate, risks and opportunities have already been identified:

- despite efforts in recent years to increase energy generation from renewable sources, Poland is still dependent on fossil fuels, particularly coal, for electricity and heat production;
- in Portugal, the high penetration of renewable energy guarantees a reduced carbon footprint in electricity generation;
- Colombia has low GHG emissions due to greater hydroelectric power generation.

The year 2024, however, was marked by the effects of *El Niño*, and periods of water scarcity that affected river flows and limited water availability for people. In the case of Colombia, lower hydroelectric power production led to an increase in electricity generation from non-renewable sources and a consequent rise in energy costs, likely resulting in higher carbon intensity of the country's power grid.

The limited availability of centralised refrigeration systems with low GWP refrigerant gases in Colombia, due to the lack of installation and maintenance services, constitutes a technological risk.

Reputational risk management is directly linked to stakeholder's expectations on our commitments to reducing our carbon footprint, fighting deforestation and supporting biodiversity preservation and conservation projects. Our actions on these issues are described throughout this subchapter. Detailed information on the progress made towards the objectives we set for these topics is provided in subchapter 6. "Sustainability Commitments" of this chapter.

Reflecting the path we have been following, in 2024 we were once again recognized by CDP with the highest possible score ('A') in the "Climate Change" programme and obtained the leadership level ('A-') in both "Water Security" and "Forests" programmes, the latter referring to management of the commodities most associated with deforestation: palm oil, beef, soy and paper/wood.

Collaboration with suppliers

Between 2021 and 2024, more than 230 Biedronka, Pingo Doce, Recheio and Ara perishables and Private Brand suppliers collaborated with our assessment, resulting in the identification of different climate adaptation and mitigation measures to reduce GHG emissions. By evaluating the climate resilience of our supply chain, we identified a growing concern on specific risks such as extreme temperatures and water availability, which have forced suppliers to adapt their activities in order to maintain production levels and product quality.

Adaptation measures identified in the supply chain

Ingredient	Company	Value chain stage	Climate risk	Examples of implemented measures
Fruit (various)	Pingo Doce Recheio	Production	<ul style="list-style-type: none"> Temperature variations Reputational 	<ul style="list-style-type: none"> Selecting varieties which have a phenology adjusted to new climate conditions that hinder flowering. Use of fruit sourced from local producers Forest and crop management
Beef	Ara Biedronka Pingo Doce Recheio	Production	<ul style="list-style-type: none"> Water shortages Energy transition 	<ul style="list-style-type: none"> Watering using own wells and ponds and the use of efficient irrigation techniques Guaranteed feed reserve for three months Installation of solar photovoltaic panels
Grains	Ara Biedronka Pingo Doce Recheio	Production	<ul style="list-style-type: none"> Changes in precipitation Extreme temperatures 	<ul style="list-style-type: none"> Regenerative agriculture
		Processing	<ul style="list-style-type: none"> Energy transition 	<ul style="list-style-type: none"> Installation of solar photovoltaic panels Use of LED lights Investment in more efficient equipment
		Production	<ul style="list-style-type: none"> Reputational Regulatory 	<ul style="list-style-type: none"> Increased efficiency in raw material processing Investment in easy-to-recycle packaging
Milk and dairy products	Ara Biedronka Pingo Doce Recheio	Production	<ul style="list-style-type: none"> Changes in precipitation Extreme temperatures 	<ul style="list-style-type: none"> Regenerative agriculture
		Processing	<ul style="list-style-type: none"> Energy transition 	<ul style="list-style-type: none"> Energy-saving systems Energy cogeneration Use of biogas Gas leak audits of equipment

Ingredient	Company	Value chain stage	Climate risk	Examples of implemented measures
Paper	Biedronka Pingo Doce Recheio	Processing	<ul style="list-style-type: none"> Energy transition 	<ul style="list-style-type: none"> Replacing natural gas with renewable energy in lime kilns Use of hydrogen in boilers
Olive oil	Pingo Doce Recheio	Production	<ul style="list-style-type: none"> Reputational Regulatory 	<ul style="list-style-type: none"> Use of organic fertilisers
		Processing	<ul style="list-style-type: none"> Energy transition 	<ul style="list-style-type: none"> Waste recovery

Ingredient	Company	Value chain stage	Climate risk	Examples of implemented measures
Beer	Pingo Doce Recheio	Processing	<ul style="list-style-type: none"> Energy transition 	<ul style="list-style-type: none"> Decommissioning of diesel boilers and replacement with high-efficiency cogeneration systems
		Logistics	<ul style="list-style-type: none"> Energy transition 	<ul style="list-style-type: none"> Use of electric vehicles

Our suppliers are implementing strategic changes to safeguard against potential climate-related risks, including:

- diversification of the origins of some ingredients (e.g. bananas, cocoa and rice), as a result of the migration of production to regions with more favourable climate conditions;
- investment in more resistant varieties of raw materials, while maintaining their origin;
- development of added-value products that are easier to preserve (e.g. jams or dehydrated products).

Moreover, the impacts of extreme events such as those that occurred in Valencia in October 2024 are monitored by the food safety and quality departments, which assess any indirect risks, such as the proliferation of pathogens (e.g. E-coli) in food products.

Sharing knowledge and cooperating with our Private Brand and perishables suppliers builds more resilient supply chains, giving rise to new business opportunities. One example of this collaboration is our sustainable agriculture programme, through which we work closely with suppliers and producers, sharing good practices and helping to assess the level of sustainability of their farms in three main components: environment, agricultural techniques and economy.

Our Sustainable Agriculture Handbook has enabled us to assess the degree to which our suppliers' farms are aligned with climate-related risks and the implementation of mitigation measures relating to water scarcity, extreme cold and the energy transition. For more information about this initiative see subchapter 5. "Governance information", section 5.2. "Business Conduct", subsection 5.2.2. "Supplier awareness and training", of this chapter.

With increasingly more extreme weather events with greater impact on their farms, our suppliers have been investing in solutions to protect against physical risks (e.g. periods of drought) and transition risks (e.g. investment in renewable energies), including:

- installing closed-loop water systems;
- using alternative water sources, such as rainwater harvesting;
- adapting to temperature variations by investing in greenhouses and crop protectors;
- investing in photovoltaic panels, alternative fuels (e.g. biodiesel), in using waste heat for greenhouses and installing LED lighting.

With regard to agricultural and livestock production, we have been monitoring the challenges that periods of drought and changes in rainy seasons pose for production in southern Europe, particularly in the Iberian Peninsula. Despite the greater frequency and duration of these weather events, there has been a widespread adoption of efficient water management measures by our suppliers, including the production of drought-tolerant crops, the use of food by-products in animal feed, and investment in water storage systems, monitoring systems and efficient irrigation systems. We believe that our influence in sharing good practices must be reflected in our activities, which is why we have drawn up a Water Management Plan for JMA's agricultural and industrial activities, which, due to the nature of its activities, use much more

water than our distribution activities. JMA's Water Management Plan establishes water efficiency measures to increase business resilience during periods of severe drought.

With regard to opportunities relating to the energy transition, prompted also by the increasingly demanding environmental regulations on our activity, over the past decade we have invested continuously in:

- purchasing energy from renewable sources and of renewable energy certificates in Portugal and Poland;
- installing photovoltaic energy production systems in stores and distribution centres in all the countries where we have operations;
- using energy recovery systems in industrial units and stores that are refurbished to reduce their energy consumption and emissions associated with refrigerant leaks from cooling and refrigeration equipment, including replacing refrigerant gases with natural or low GWP refrigerant gases.

The main mitigation measures implemented in our operations are described throughout this subchapter. We also report in detail and publicly disclose our climate-related risks and opportunities in our responses to CDP (Disclosure Insight Action).

With regard to business opportunities in our supply chain, we continue to witness and stimulate the investment of our suppliers in the production of renewable energy for self-consumption, in particular for energy-intensive processes (e.g. the processing of raw materials such as coffee bean roasting or sugar refining), and in the production of raw materials, most notably the growing use of low carbon fuels in agricultural machinery and the recovery of waste for the production of these fuels. These investments in low carbon technologies are essential to reducing the indirect emissions associated with our purchases of goods and services.

As for production, investing in new varieties and in climate-resistant crops, as well as diversifying countries of origin are some of the opportunities identified by producers (see table below).

Opportunities identified by our suppliers

Country	Activity	Business opportunity
Portugal Poland Colombia	Production	Production of climate-resilient varieties, focusing in particular on natural selection techniques.
Portugal Poland Colombia	Production	Production in greenhouses or covered enclosures, thus guaranteeing crop production in periods when weather conditions are less favourable.
Portugal	Production	Incorporation of alternative protein sources, such as <i>algae</i> and insects, to improve product formulation, with a reduction in GHG emissions associated with land use and change in the production of agricultural commodities.
Portugal Poland Colombia	Production	Regenerative agriculture practices, aimed at improving soil health in order to regenerate and maintain soil fertility in the long term while making crops more resistant to pests.
Poland	Production	Development of low carbon plant-based protein products and carbon removal projects through agroforestry management, land use and the restoration of marshes and forests.
Poland	Processing	Investment in cogeneration and photovoltaic energy systems for milk processing.
Portugal	Logistics	Electrification and use of renewable fuels (e.g. biofuel) for the heavy and light vehicle fleet.

As a food retailer, we have a very diverse product portfolio and a mature and efficient logistics network, ensuring the supply of similar or alternative products in our stores in the event of temporary supply shortages. Increasing the production of certain foodstuffs in regions where climate change has led to productivity gains and the development of innovative and alternative products are the main opportunities that the Companies have been exploring in recent years. One example is the increase in fruit and vegetable production in Poland, where winters have been less severe.

Progress

In 2025, we will continue working on assessing climate-related financial risks and opportunities and strengthening collaboration with the supply chain to:

- increase knowledge about some emerging climate-related risks, such as the impact of extreme weather events on our stores and logistics operations;
- consider a greater variety of ingredients in the identification and assessment of risks and opportunities in order to cover more of our Companies' Private Brand and perishable products in the different countries where we have operations;
- improve the calculation of inherent and residual financial risk by integrating the mitigation and adaptation measures identified in our supply chain;
- continue to assess the climate resilience of our supply chain and identify initiatives to transition to a low carbon economy;
- map and quantify business opportunities associated with the development of new products and identify alternative origins or potential increases in the production of certain crops in regions with favourable climate conditions.

Our climate transition plan

[ESRS 2 SBM-3; ESRS E1-1]



Our priority and efforts are focused on the decarbonisation initiatives described in the [Climate Transition Plan](#), in particular the reduction of scope 1 and 2 emissions, reflected in the increase in process efficiency and investment in low carbon solutions.

Our supply chain engagement programme to reduce the Group's GHG emissions will enable scope 3 emissions to be calculated more accurately, by incorporating more primary data on product emissions, and help strengthen cooperation with our suppliers and service providers in its efforts of reducing our carbon footprint.

It should be made clear that under this plan the Group's Companies are not exposed to locked-in greenhouse gas emissions associated with their main assets and products and, as such, they are not included as a transition risk. Moreover, our Companies are included in the EU Paris-aligned benchmarks as defined in point E1-1 paragraph 16(g) of Annex I of the European Sustainability Reporting Standards (ESRS).

The plan details planned actions and those underway to achieve the goals we have set. In this subchapter we describe the main progress made in each of these areas in 2024.

Carbon footprint

[ESRS E1-3, ESRS E1-6, ESRS E1-7]

[GRI 302-2; GRI 305-1; GRI 305-2; GRI 305-3; GRI 305-4; GRI 305-5]



Our scope 1 and 2 GHG emissions corresponded to 783,000 tonnes of carbon dioxide equivalent (CO₂e) in 2024, 15.8% less than in 2023 and 19% less than in 2021, defined as the base year for our SBTi- and Climate Transition Plan-aligned commitments. This reduction is mainly due to the contraction in carbon intensity of the Polish power grid, and to the investments in the purchase and production of renewable energy, as well as to the acquisition of cooling systems with natural or low GWP refrigerant gases.

Scope 1 and 2 emissions (2024 and 2023)

Carbon footprint (t CO ₂ e) ¹⁴	2024	2023	Δ 2024/2023
Overall carbon footprint (scopes 1 and 2)¹⁵ by GHG	782,610	*929,714	-15.8%
Carbon dioxide (CO ₂)	671,026	*802,100	-16.3%
Methane (CH ₄)	22,543	*19,354	+16.5%
Hydrofluorocarbons (HFC)	85,743	104,914	-18.3%

¹⁴ The Group Companies have not acquired carbon credits to offset their scope 1, 2 or 3 emissions, nor have they implemented removal or storage projects in their operations or value chain.

¹⁵ Scope 2 emissions concern location-based (heating) and market-based (electricity) type emission factors.

Carbon footprint (t CO ₂ e) ¹⁴	2024	2023	Δ 2024/2023
Perfluorocarbons (PFC)	0	0	-
Nitrous oxide (N ₂ O)	3,298	*3,346	-1.4%
Sulphur hexafluoride (SF ₆)	0	0	-
Overall carbon footprint (scopes 1 and 2)	782,610	*929,714	-15.8%
Biedronka	609,632	*747,956	-18.5%
Hebe	21,023	*21,217	-0.9%
Pingo Doce ¹⁶	31,348	40,536	-22.7%
Recheio	3,758	3,977	-5.5%
Ara	87,989	91,384	-3.7%
JMA	28,749	*24,499	+17.3%
Hussel/Jeronymo ¹⁷	111	145	-23.4%

Carbon footprint (t CO ₂ e) ¹⁸	2024	2023	Δ 2024/2023
Carbon Footprint (scope 1 – direct impacts)	203,619	*240,592	-15.4%
Refrigerant leaks	85,816	104,976	-18.3%
CO ₂ usage	28,796	29,166	-1.3%
Fuel consumption	45,486	65,459	-30.5%
Light vehicle fleet	20,448	21,788	-6.2%
Emissions from agriculture and livestock farming	23,073	19,203	+20.2%
Biogenic CO ₂ emissions from biomass combustion or biodegradation	0	0	-
Carbon footprint (scope 2 – indirect impacts)¹⁹	578,991	*689,122	-16.0%
Electricity consumption (market-based)	566,423	674,052	-16.0%
Heating (market-based)	12,568	*15,070	-16.6%
Electricity consumption (location-based)	747,918	755,226	-1.0%
Heating (location-based)	19,311	*22,956	-15.9%
Biogenic CO ₂ emissions from biomass combustion or biodegradation	0	0	-
Net revenue (million euros)	33,464	30,608	+9.3%

* Values corrected to improve alignment with the Greenhouse Gas Protocol methodology.

Scope 3 emissions (2024 and 2023)

Carbon footprint (t CO ₂ e) ¹⁴	2024	2023	Δ 2024/2023
Carbon footprint (scope 3 – other indirect impacts)	32,763,786	31,228,412	+4.9%
Poland	22,972,862	21,877,554	+5.0%
Portugal	6,279,674	6,043,101	+3.9%
Colombia	3,500,778	3,307,757	+5.8%
Morocco	9,423	-	-
Czechia and Slovakia	1,049	-	-
Carbon footprint (scope 3 – other indirect impacts)	32,763,786	31,228,412	+4.9%
C1. Purchased products and services	28,712,141	27,001,355	+6.3%
C2. Capital goods	452,588	627,556	-27.9%
C3. Fuel and energy related activities	296,397	307,489	-3.6%
C4. Upstream transport and distribution	267,219	256,781	+4.1%
C5. Waste produced in operations	55,254	57,091	-3.2%
C6. Work travel	2,551	4,841	-47.3%
C7. Commuting	21,069	20,813	+1.2%
C8. Assets rented upstream	-	-	-
C9. Downstream transport and distribution	-	-	-
C10. Transformation of products sold	1,425	799	+78.3%

¹⁶ To measure the environmental indicators reported in this subchapter, the distribution centres, central buildings, and trucks used to distribute goods were accounted for under Pingo Doce.

¹⁷ To calculate the environmental indicators reported in this subchapter, Hussel and Jeronymo's emissions were estimated based on their sales, making a correlation between commercial activities and Pingo Doce's environmental impacts.

¹⁸ The Group Companies have not acquired carbon credits to offset their scope 1, 2 or 3 emissions, nor have they implemented removal or storage projects in their operations or value chain.

¹⁹ Information on purchased electricity bundled with instruments such as guarantees of origin or renewable energy certificates can be found in subchapter 7."Reporting frameworks", section 7.1. "ESRS-European Sustainability Reporting Standards", of this chapter.

Carbon footprint (t CO ₂ e) ¹⁴	2024	2023	Δ 2024/2023
C11. Use of products sold	1,624,066	1,539,946	+5.5%
C12. End of life of products sold	1,320,803	1,402,175	-5.8%
C13. Assets rented downstream	-	-	-
C14. Franchises	-	-	-
C15. Investments	10,273	9,566	+7.4%
Biogenic CO ₂ emissions from biomass combustion or biodegradation	0	0	-
Net revenue (million euros)	33,464	30,608	+9.3%

* Values corrected to improve alignment with the Greenhouse Gas Protocol methodology.

Note 1: Carbon footprint calculations for the different activities follow the Greenhouse Gas Protocol methodology of the World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI), at all three levels: direct, indirect and third party. Scope 1 and 2 emissions correspond to activities under the Group's financial control and which account for 99.996% of turnover. The values shown took the following into account: (i) refrigerant gases – emission factors defined by the IPCC; (ii) chemical fertilizers – emission factors defined by the IPCC and by Agência Portuguesa do Ambiente (Portuguese Environmental Agency); (iii) enteric methane emissions from cattle, sheep and manure management (methane emissions) – emission factors defined by the Portuguese Environmental Agency; (iv) fuel and heating – defined by Direção-Geral de Energia e Geologia de Portugal (Portuguese Directorate-General for Energy and Geology), by Unidad de Planación Minero Energética (Colombian Unit of Mining and Energy Planning) and by Krajowy Ośrodek Bilansowania i Zarządzania Emisjami (Polish Centre for Emission Balance and Management); (v) electricity – defined by the International Energy Agency (location-based electricity), by suppliers (market-based electricity in Portugal and in Poland), by the Association of Issuing Bodies for franchise stores or stores located in third-party establishments (market-based electricity in Poland), and by Unidad de Planeación Minero Energética (market-based electricity in Colombia); (vi) fuel used in the light vehicle fleet – defined by the Greenhouse Gas Protocol. The emission factors defined by IPCC for stationary combustion, refrigerant gases and enteric methane emissions and those defined by the Greenhouse Gas Protocol for fuel used in the light vehicle fleet were used to calculate the scope 1 carbon footprint by GHG. As regards the breakdown of scope 2 emissions, the percentages of each GHG were considered in the emission factors defined by the International Energy Agency.

Note 2: The calculation of scope 3 emissions took the following into account: C1 – There is no validated data or data provided by suppliers, so we use the weight and/or value of the products purchased and the emission factors from Agribalyse and the Environmental Protection Agency (EPA), in particular the Environmentally-Extended Input-Output (EEIO) factors. For the purchase of services, the EPA's EEIO emission factors were taken into account. Emissions associated with water consumption have also been taken into account using UK Department for Environment, Food & Rural Affairs (DEFRA) factors; C2 – the EPA's EEIO emission factors for the different types of investment are used to calculate the carbon footprint; C3 – Well-to-Tank" (WTT) emissions associated with the extraction, production and transport of energy (electricity, heating and fuels) that are not included in scopes 1 or 2 are calculated in this category using DEFRA and International Energy Agency (IEA) emission factors; C4 – emissions from consumption are calculated in this category, including WTT emissions associated with the extraction, production and transport of fuels in the transport of goods between the Group's operating units and delivery services to customers, using DEFRA emission factors; C5 – DEFRA emission factors are taken into account for the different destinations of waste generated in operations, customer waste and wastewater; C6 – when calculating emissions from work trips, air and train travel and hotel stays are taken into account using DEFRA emission factors (when travelling by air, the indirect impacts of GHG emissions other than CO₂ are taken into account), including WTT emissions; C7 – the calculation of emissions associated with employee commuting does not include employees with service vehicles (reported in scope 1) and took into account the Group Companies' remote working policy. A custom emission factor was established based on DEFRA emission factors and statistical data on the average distance travelled by mode of transport; C10 – emissions associated with the processing of products sold by JMA to companies outside the Group are calculated using the EPA's Agribalyse and EEIO emission factors; C11 – in this category, direct emissions from electrical and electronic products and fuels sold are taken into account using IEA emission factors for the energy consumption of electrical and electronic products and DEFRA emission factors for direct emissions from the consumption of fuels sold. Emissions from the use of agricultural by-products sold to third parties are also taken into account, namely manure, given that manure is used as a fertiliser for soils and has associated N₂O emissions. In this case, data from the Code of Good Agricultural Practices (Official Journal of Portugal) using Portuguese Environment Agency and IPCC emission factors; C12 – in this category, emissions associated with the end of life of products and their packaging are taken into account using DEFRA emission factors; C15 – in this category, investments by Group Companies in associates or joint ventures are taken into account and the respective emissions calculated using the EPA's EEIO emission factors or the emissions published by the subsidiaries.

Note 3: scope 1 GHG emissions from our Companies' activities are not covered by the European Emissions Trading Scheme of the regulated emissions trading systems.

Note 4: Emissions from JMA's farming and livestock activities include enteric emissions from cattle and sheep, the use of chemical fertilisers, and manure management.

Note 5: parameter C14 includes franchising and similar models.

A 4.9% increase in scope 3 emissions was recorded, in line with the growth of our business. The increase in scope 3 emissions is also associated with the use of estimates to calculate these emissions, most of which are indexed to the Companies' sales volume.

In 2024, emissions calculated on the basis of primary data accounted for 12.3% of total scope 3 emissions. We launched a communication platform with suppliers to gain more insight into the carbon footprint of our supply chain.

Interaction with some of Biedronka, Pingo Doce and Recheio's main suppliers revealed a diverse landscape of commitment and implemented actions to reduce GHG emissions. The majority of the 20 suppliers contacted demonstrate alignment with international GHG accounting standards, with 60% updating their inventories annually and 50% ensuring third-party verification of emissions. As regards emission reduction targets, 50% of the suppliers contacted set targets for scope 1 and 2 emissions, and 30% also included scope 3 targets. Additionally, 30% of these 20 suppliers contacted have validated

targets by the Science-Based Targets initiative (SBTi) and 20% are in the process of defining their targets, which reflects the adhesion of our supply chain to the commitment to mitigate climate change. The implementation of climate strategies is another positive aspect, with 50% of suppliers publishing climate transition or decarbonisation plans.

The actions implemented by the contacted suppliers to reduce their energy consumption and GHG emissions are varied and wide-reaching. Performing energy audits and improving the energy efficiency of equipment through technological upgrades are common practices adopted by 80% of the suppliers analysed (20 in total). Approximately 70% of suppliers contacted purchase and generate renewable energy for self-consumption, and employee training in energy efficiency practices is provided by half of the suppliers. In logistics processes, 50% of the suppliers contacted invest in reducing transport emissions, a crucial measure for reducing total emissions associated with the supply chain.

The additional measures specified by suppliers, such as purchasing local raw materials, replacing synthetic fertilisers with natural alternatives, using biogas, and building medium and large photovoltaic plants, demonstrate a continuous effort to innovate and implement low carbon solutions. These initiatives not only contribute to reducing GHG emissions but also to globally promote more sustainable agricultural practices.

To obtain more granular primary data from suppliers, Biedronka has been developing product carbon footprint calculators for its main Private Brand and perishable products. Thus far, five calculators have been created and nine workshops held for 650 suppliers. JMA has also been calculating the carbon footprint of its products, obtaining carbon footprint certification for Best Farmer's Aberdeen Angus cattle in the first half of 2024.

As our reliance on estimates for calculating scope 3 emissions decreases, it will be easier to identify additional opportunities to reduce supplier carbon emissions and thus converge with our reduction targets for this scope, as set out in our Climate Transition Plan and in section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", point "Commitments", of this chapter.

GHG emissions' intensity (scopes 1, 2 and 3) based on net revenue fell from 1.051 to 1.002 tonnes of CO₂e (per 1,000€ of sales), reflecting the increased efficiency of our operations.

GHG intensity based on net revenue

Carbon Footprint (t CO ₂ e)*	2024	2023	Δ 2024/2023
Total carbon footprint (scopes 1, 2 and 3)	33,546,395	**32,158,126	+4.3%
Scope 1 - direct impacts	203,619	**240,592	-15.4%
Scope 2 - indirect impacts	578,992	**689,121	-16.0%
Scope 3 - other indirect impacts	32,763,786	**31,228,412	+4.9%
Net revenue (million euros)	33,464	30,608	+9.3%
Intensity (t CO₂e/000' euro)	1.002	1.051	-4.6%

* The Group Companies have not acquired carbon credits to offset their scope 1, 2 or 3 emissions, nor have they implemented removal or storage projects in their operations or value chain.

** Values corrected to improve alignment with the Greenhouse Gas Protocol methodology.

Energy consumption management

[ESRS 2 MDR-M; ESRS E1-5]

[GRI 302-1; GRI 302-2; GRI 302-3; GRI 302-4; GRI 302-5]



In 2024, our energy consumption remained relatively stable and fell 0.8% compared to 2023, despite the opening of an additional 350 stores in the year. Consumption per million euros was 65.9 MWh, 9.3% less than in 2023.

Of the Group's activities considered as having a high climate impact²⁰, retail accounts for 98.4% of energy consumption, agriculture and fishing (Section A, NACE rev.2) accounts for 0.4%, and manufacturing (Section C, NACE rev.2) accounts for 1.1%. Jeronimo (Section I, NACE rev.2), which accounts for 0.1% of the Group's energy consumption, was also taken into account.

²⁰ High climate impact sectors considered in the energy intensity calculation are: Section A - Agriculture, Forestry and Fishing; Section C - Manufacturing; and Section G - Wholesale and Retail Trade.

Total energy consumption and by business unit

Total energy consumption and by business unit (MWh)	2024	*2023	Δ 24/23
Group	2,206,538	2,225,177	-0.8%
Biedronka	1,216,869	1,209,220	+0.6%
Hebe	28,633	27,304	+4.9%
Pingo Doce ²¹	545,360	557,002	-2.1%
Recheio	58,610	58,406	+0.3%
Ara	320,528	337,719	-5.1%
JMA	34,659	33,591	+3.2%
Hussel/Jeronymo	1,878	1,935	-2.9%
Net revenue from activities in high climate impact sectors (million euros)	33,464	30,608	+9.3%
Total consumption (MWh/million euros in net revenue)	65.9	72.7	-9.3%

* These values were revised to include Jeronymo's energy consumption.

In terms of energy consumption per business unit, Hebe saw the highest increase, due to the growth in the number of stores in its network. JMA recorded the second highest increase, as a result of fuel consumption by the aquaculture unit's vessels and by the generator for the new milking parlour at Monte do Trigo, as well as increased electricity consumption at the Terra Alegre factory, where production increased by 20%. Despite adding 161 more stores to its network, Biedronka's consumption only saw a slight increase (0.6% more than in 2023). This stabilisation is justified by the reduction in fuel consumption and the reduced need for heating in a year with a warmer winter. Ara, despite increasing its number of stores (around 150), reduced energy consumption by connecting stores to the power grid instead of using fuel generators.

In 2024, we increased the number of stores with electric vehicle charging points to 234 at Pingo Doce, 7 at Recheio, and 499 at Biedronka, supplying more than 9,734 MWh in the year.

Energy consumption per source

Energy consumption	2024	*2023	Δ 2024/2023
Fuel consumption from coal and coal products (MWh)	0	0	-
Fuel consumption from crude oil and petroleum products (MWh)	132,488	194,748	-32.0%
Fuel consumption from natural gas (MWh)	129,976	154,279	-15.8%
Fuel consumption from other fossil sources (MWh)	18,098	16,637	+8.8%
Consumption of electricity and heat from fossil sources (MWh)	744,029	861,113	-13.6%
Total fossil energy consumption (MWh)	1,024,591	1,226,777	-16.5%
Proportion of fossil sources in total energy consumption (%)	46.5%	55.2%	-8.7 p.p.
Energy consumption from nuclear sources (MWh)	534	534	0.0%
Proportion of energy from nuclear energy in total energy consumption (%)	0.02%	0.02%	-0.0 p.p.
Fuel consumption from renewable sources, including biomass (including industrial and urban organic waste, biogas, renewable hydrogen, etc.) (MWh)	**0	**0	-
Consumption of electricity, heat, steam and cooling from renewable sources (MWh)	1,099,253	966,227	+13.8%
Self-generated non-fuel renewable energy consumption (MWh)	82,160	31,639	+159.7%
Energy consumption from renewable sources (MWh)	1,181,413	997,866	+18.4%
Proportion of renewable sources in total energy consumption (%)	53.5%	44.8%	+8.7 p.p.
Total energy consumption (MWh)	2,206,538	2,225,177	-0.8%

* These values were revised to include Jeronymo's energy consumption.

** As we were unable to determine the proportion of renewable fuels due to the lack of public data, the worst-case scenario was considered, i.e. 0% consumption of fuels from renewable sources. The Group does not have any non-renewable energy generation plants. The only non-renewable energy is generated occasionally by emergency generators.

²¹ To measure the environmental indicators reported in this subchapter, the distribution centres, central buildings, and trucks used to distribute goods were accounted for under Pingo Doce.

The percentage of consumption of energy from renewable sources increased 8.7 p.p. compared to 2023, mainly due to investment in power purchase agreements and Guarantees of Origin and to a higher renewable component in Poland's energy mix. Renewable energy sources now account for more than 53% of the total energy consumption by our operations. Considering electricity consumption alone, around 62% came from renewable sources.

Our actions to reduce carbon emissions

[ESRS 2 MDR-A;ESRS E1-3]



As part of our Climate Transition Plan, we have implemented a series of actions aimed at reducing our carbon emissions:

- transition to natural refrigerant gases and those with low Global Warming Potential;
- investment in renewable energy sources and increased energy efficiency of our stores;
- transition from fossil fuels and increased logistics efficiency;
- promotion of a circular economy²².

Management of refrigerant gases

In our food distribution business, in which we stand out for the quality of our specialised perishables offering, refrigeration and air conditioning systems are of critical importance. These systems are vital to ensuring the quality, safety and preservation of food products, and play a decisive role in fighting food waste.

However, refrigeration systems and air conditioning consume energy and, in the event of a leak, also emit greenhouse gases. We invest in more efficient equipment precisely to reduce these effects. As part of the management of carbon emissions associated with the use of refrigerant gases in these systems, we have also installed leak control technologies and, where possible, we voluntarily opt for natural refrigerant gases in industrial refrigeration installations or those with low Global Warming Potential in heating, ventilation and air conditioning installations.

Establishments using natural refrigerant gases

Type of establishment	Total		Progress*	
	2024	2023	2024	2023
Stores - centralised refrigeration system	3,439	2,953	57%	52%
Stores - stand-alone equipment	5,238	4,875	86%	85%
Distribution centres and industrial units - centralised refrigeration system	26	24	70%	67%

* Coverage rate in relation to the total number of establishments.

In 2024, the refrigeration systems of 70% of our distribution centres and industrial units, together with around 57% of those in stores were running on natural or low GWP refrigerant gases. Worthy of note is the investment in stand-alone refrigeration units, such as freezers, used in around 86% of our stores (3,489 at Biedronka, 1,404 at Ara, 305 at Pingo Doce, and 40 at Recheio).

Energy efficiency and renewable energies

We have implemented several good practices to reduce our carbon emissions associated with energy consumption. The refurbishment and new store opening plan includes solutions such as:

- technologies for generating renewable energy;
- energy control and management systems;
- refrigeration technologies and efficient freezers;
- efficient lighting.

²² Information about our actions to promote a circular economy can be found in subsection 3.2.2. "Resource use and circular economy", of this subchapter.

Renewable Energy

Technology	Number of buildings		Energy (GJ/year)		Savings* (t CO ₂ e/year)	
	2024	2023	2024	2023	2024	2023
Photovoltaic panels for self-consumption	2,101	779	295,776	113,901	35,567	15,772
Pingo Doce ²³	36	26	48,820	29,475	2,287	1,880
Recheio	10	7	11,836	5,174	558	330
Biedronka	**1,804	728	202,420	68,887	31,604	13,050
Ara	249	16	26,307	4,591	818	143
JMA	2	2	6,393	5,774	300	368
Lamp posts and security system powered by photovoltaic panels and/or wind turbines	9	9	584	534	27	35
Pingo Doce ¹⁰	1	1	130	130	6	8
Recheio	5	5	439	258	21	17
Biedronka	1	1	10	10	0.4	2
JMA	2	2	6	136	0.3	8
Solar collectors to produce hot water used for heating water and/or in the air conditioning system	16	17	3,952	4,020	185	256
Pingo Doce ¹⁰	7	7	3,399	3,399	159	217
Recheio	7	8	489	552	23	35
JMA	2	2	64	69	3	4
Geothermal heat pumps (Biedronka)	20	15	4,467	5,884	697	1,115

* These values reflect the update in the electricity emission factor (market-based).

** At the end of 2024, there were 1,695 operational Biedronka buildings, 45 were waiting to be connected to the electricity grid and 64 new photovoltaic power plants were under construction.

In 2024, we invested heavily in the installation of photovoltaic panels for self-consumption, particularly in Poland and Colombia. The investments ensured the generation of around 305 thousand GJ, 145% more than in 2023. Since July 2018, we have been investing in electricity from renewable energy sources to power the operations of our banners in Portugal, by purchasing Guarantees of Origin (GO). In 2024, this investment in photovoltaic panels, GO and other renewable energy technologies avoided the emission of 120 thousand tonnes of carbon dioxide equivalent, while Biedronka, through a Virtual Purchase Power Agreement (VPPA), guaranteed the production of 226 thousand GJ of photovoltaic solar energy and avoided the emission of 35,300 tonnes of carbon dioxide equivalent.

Raising employee awareness of waste recovery and the efficient use of water and energy has also helped improve the environmental performance of our establishments. The “Water and Energy Consumption Management Teams” project, launched in 2011 in the Pingo Doce and Recheio stores, has helped to reduce water consumption by 493 thousand m³ and energy consumption by 119 thousand MWh, corresponding to an accumulated savings of over 13.8 million euros²⁴. At Pingo Doce, the actions of these teams are part of the “Todos pelo Ambiente” (Everyone for the Environment) initiative. Biedronka continued its “Dobra energia” (Good Energy) project, launched in 2022, which included the development of a good practice handbook to save energy in stores, interactive training for all store employees, energy monitoring reports, and a dedicated chatbot to facilitate daily store operations. The “Let’s Go Green” project, implemented in 2015 with the same goal, encompasses office buildings in Portugal, Poland and Colombia.

We have invested over 690 million euros in energy efficiency, renewable energy production for self-consumption and low GWP refrigerant gases since 2017, around 300 million of which in the past two years, underscoring our reinforced focus on reducing energy consumption and carbon emissions. Our average recovery period is three years and has already avoided the emission of more than 1.1 million tonnes of CO₂e.

In the coming years, and in order to achieve our short-term scope 1 and 2 targets, we plan to invest an average of at least 10% of CapEx each year. Investments related to on-site production and the purchase of renewable energy through Guarantees of Origin, Power Purchase Agreements and Virtual Power

²³ To calculate the environmental indicators reported in this section, the distribution centres, central buildings and trucks used in the distribution of goods at Pingo Doce have been considered.

²⁴ Value calculated based on regular internal benchmarking reports, from which the stores refurbished in 2023 and 2024 were excluded because consumption was not comparable.

Purchase Agreements, will continue to grow and represent a higher percentage of operating expenses. Additional information on the CapEx associated with these activities is provided in subchapter 3.3 "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", of this chapter.

Fossil fuels and increasing logistics efficiency

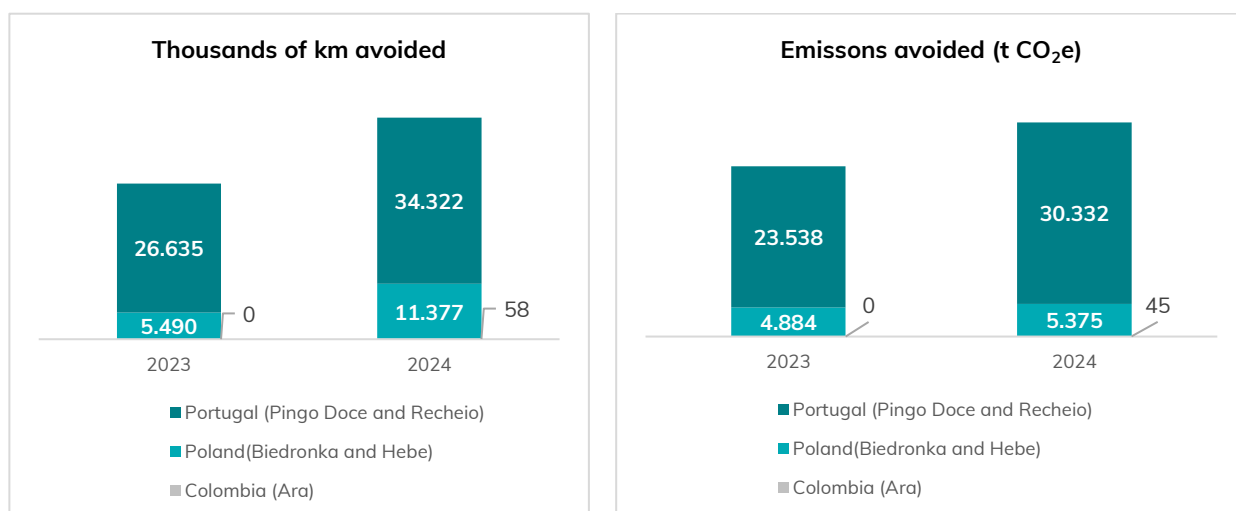
Our plan to reduce carbon emissions associated with the consumption of fossil fuels in operations and logistics involves:

- increasing the number of electric and/or plug-in hybrid vehicles in our fleet and increasing the use of biofuels and hydrogen;
- progressively reducing the use of fossil fuels in operations through the electrification of equipment and/or the use of biofuels;
- improving the efficiency of logistics processes.

In 2024, approximately 12% of our light vehicle fleet in Portugal and 1% in Poland was electric or hybrid, in line with 2023 (11% in Portugal and 1.5% in Poland).

We are optimising distribution routes – via backhauling²⁵ and fronthauling²⁶ – and increasing investment in more efficient trucks to improve the efficiency of logistics processes.

Backhauling operations



In 2024, backhauling operations shaved off 45.8 million kilometres, 40% more than in 2023, with the respective reduction in emissions (35,800 tonnes of carbon dioxide equivalent). In Colombia, backhauling is practically non-existent due to the lack of space on trucks to increase reverse logistics. In addition, suppliers are not close to the return routes.

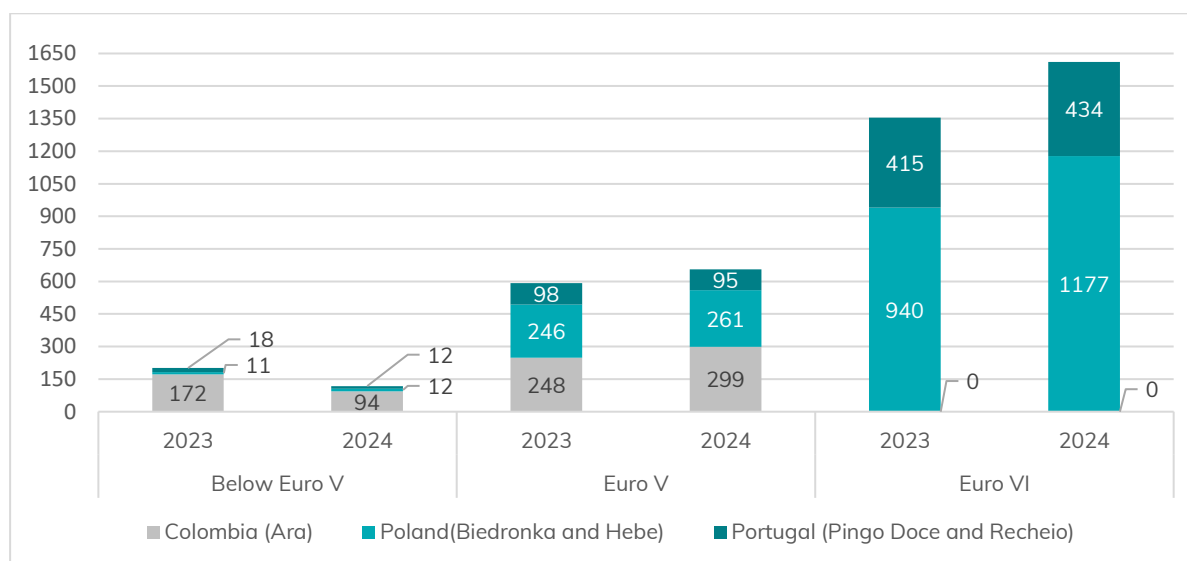
The fronthauling project shaved off around 150,000 km (2.7% more than in 2023) and avoided the emission of 132 tonnes of carbon dioxide equivalent at Pingo Doce and Recheio.

At Ara, the project to transport non-palletised goods to optimise transport loads between our suppliers' facilities and our distribution centres shaved off over one million kilometres (73.0% more than in 2023) and avoided the emission of 1,734 tonnes of carbon dioxide equivalent. The by-truck project (extra trailers for the transportation of goods between distribution centres and the farthest stores) shaved off 2 million kilometres, 1.4% less than in 2023, and consequently avoided the emission of 1,609 tonnes of carbon dioxide equivalent.

²⁵ After delivering products to our stores, the return route includes stopping by the facilities of the Group's suppliers to pick up goods and take them to the distribution centre.

²⁶ After delivering products to our distribution centres, our suppliers' return route to their facilities includes stopping by the Group's stores to deliver goods. This project is only implemented in Portugal.

Breakdown of goods transport vehicles according to the Euro standards



In 2024, more than 95% of the vehicles we use for transporting goods were Euro V or VI trucks, an increase of 5 p.p. compared to 2023. We also registered the additional use of Euro VI trucks (256 more than in 2023), while Colombia increased its fleet of Euro V and Euro IV trucks (51 more trucks).

In 2024, carbon emissions (per thousand pallets) associated with the transport of goods to stores decreased 6.1% compared to 2021, the base year. Our goal is to reduce carbon dioxide equivalent emissions by 5%, per thousand pallets transported, by the end of 2026, compared to 2021.

Carbon emissions associated with pallet transport

	2021	2023	2024
Transport of goods to stores (km)	249,551,570	265,523,690	263,407,687
Transport of goods to stores (t CO ₂ e)	205,375	220,058	214,794
Carbon emissions from transporting goods to stores, per 1,000 pallets transported (t CO₂e/1,000 pallets transported)	5.57	5.40	5.22

Decarbonising logistics

JMA's dairy company Terra Alegre was awarded its first Lean & Green star in 2024 for its logistics decarbonisation plan, which saw CO₂e emissions from its logistics operations reduced by 23.4% in 2023 compared to 2022.

Pingo Doce, which joined Lean & Green in 2021, is the first company in Portugal and the fourth in Europe to achieve the four stars. Conquered in 2024, this recognition is the result of a 55% reduction in carbon dioxide equivalent emissions (tCO₂e/pallet) in its logistics operations in mainland Portugal, compared to 2018.

Biedronka, which also joined the Lean & Green initiative in 2021, had already received a star in 2022, as a result of a 20% reduction in emissions from logistics activities in eight of its distribution centres between 2017 and 2020. In 2024, Biedronka was awarded a second Lean & Green star after reducing carbon emissions by a further 12% in logistics activities between 2021 and 2023. To receive the second star, Biedronka had three years to demonstrate that it was able to maintain a 20% reduction in GHG emissions and achieve a further 10% reduction in CO₂e within three years, covering 12 out of its 17 distribution centres, equivalent to at least 65% of the volume transported, according to the programme's criteria.

Lean & Green is a European initiative that aims to achieve carbon neutrality in logistic activities by 2050.

Carbon pricing

[ESRS 2 MDR-M; ESRS E1-8]



We use internal shadow carbon prices to support our decision-making on investments associated with the measures to be implemented (CapEx) for achieving our GHG reduction targets. This decision-support tool is used, for example, in own fleet and equipment purchase decisions and in our store refurbishment budgets, as well as to assess the transition risks of energy prices within the scope of our climate scenario analysis.

Carbon pricing is linked to carbon tax prices in Portugal and Colombia²⁷, corresponding to an average of €28.40/tCO₂e. In both cases, the amount is set by regulatory decree. The tax price in Portugal is linked to the price of carbon allowances under the EU Emissions Trading Scheme. In Colombia, the value is linked to the National Carbon Tax, which is levied on the carbon equivalent content (CO₂e) of all fossil fuels, including oil derivatives, fossil gas and solid fuels used for combustion. More information on this topic is disclosed in subchapter 7. "Reporting Frameworks", in section 7.1. "ESRS-European Sustainability Reporting Standards", of this chapter.

Commitments

[ESRS 2 MDR-T; ESRS E1-4]



The Group's commitments related to this topic can be found in subchapter 6. "Sustainability commitments", of this chapter.

3.2.2. Resource use and circular economy

The circular economy is one of the building blocks of the European Green Deal, by promoting greater resource efficiency and creating the conditions for the reintegration of products, or their components, into new value chains. Optimising the reuse of resources involves, for example, by reducing food waste, integrating ecodesign concepts into product and packaging development, optimising waste recovery, and establishing cooperative and empowering relationships with suppliers, civil society and consumers.

Managing circular economy-related risks and opportunities

[ESRS 2 SBM-3; ESRS 2 IRO-1; ESRS E5-6]



The main risks and opportunities identified associated with the circular economy, in particular with the two topics most relevant to the Group (packaging and food waste), are related to the types of resources used (renewable and non-renewable), the waste of resources, and the recovery and recycling of waste. We assess these risks and opportunities using the LEAP (Locate, Evaluate, Assess and Prepare) approach.

Risks and opportunities are considered material where they exceed a 5% potential variation in sales, in which case they are identified, assessed and managed at corporate level. Where they fall below the materiality threshold (variation of up to 5% of sales considering the inherent risk²⁸), they are identified and assessed at corporate level and managed at Company level.

Identifying risks and opportunities includes:

- monitoring the specific regulations of each country (e.g. extended producer responsibility);
- carrying out a detailed assessment of the recyclability of Private Brand packaging, using the Ellen MacArthur Foundation methodology, and of the amount wasted of each food product, following the best practices defined by the Food Loss and Waste Protocol;

²⁷ We did not consider the carbon tax in force in Poland as it was considered significantly low and not aligned with international reference values (€0.09/tCO₂), increasing the risk of resulting in a value too low, which would undermine the use of carbon pricing as a risk management and internal efficiency tool.

²⁸ Inherent risk is the level of risk without considering response strategies to a given circular economy-related risk (physical or transition).

- analysing market trends, in particular our customers' preferences (e.g. convenience in purchasing decisions, or the choice between disposable and reusable packaging).

More information about these measures is provided in points 52, 53 and 54 of Chapter 4 "Corporate Governance" of this report.

Risks

The risks associated with the circular economy were assessed and selected according to their materiality to our activities:

- transition (including political, regulatory, market, technological and reputational risks);
- physical (e.g. the risk of a raw material shortage).

Because of the potential loss to the value chain, food waste is the most material circular economy risk. The risks associated with regulations, particularly on the recyclability of packaging, are of minor importance as, in some cases, they depend on sectoral adaptations.

Market risks, such as the cost differences between recycled and virgin materials, can affect the competitiveness of a product and the reputation of our brands if we do not meet the voluntary objectives we set.

When assessing the risks associated with food waste, both cold chains and packaging are top-of-mind. Packaging plays a decisive role in balancing various dimensions of our business, enabling the preservation of the food we sell, guaranteeing the defence of the integrity and shelf life of the food, logistical efficiency through the format of the packaging, the selection of materials used with direct implications for the circularity of materials, as well as the cost of the product itself. The way we deal with the risk associated with packaging is reflected in the integration of criteria that promote greater circularity in the packaging of our Private Brand and perishable products. Aspects such as the integration of recycled materials, preference for mono-material packaging or preference for colours that are easily distinguished by recyclers' optical readers are valued in our decision-making. More information on this topic is provided in subsection 3.2.2. "Resource use and circular economy", point "Actions to promote the circular economy", subpoint "Ecodesign of packaging", in this subchapter.

In the particular case of packaging components comprising vegetable fibres, such as paper and wood, we have implemented additional measures towards the regeneration of natural systems and ensure that these commodities do not come from areas associated with deforestation. These initiatives are described in more detail in section 3.2.4. "Biodiversity and ecosystems", point "Fighting deforestation", of this subchapter.

Opportunities

The opportunities assessed include:

- resource efficiency, such as optimising the use of materials and waste management;
- markets, including supply chain sustainability and the sharing economy (e.g. shared transport packaging);
- financing, such as investment funds for circular economy projects;
- reputation, continuously improving communication and interaction with the various stakeholders, towards meeting their expectations and addressing their concerns.

We continually account for and monitor the use of the different materials that make up our packaging. We also participate in circular economy projects to identify opportunities to optimise the use of materials, increase recyclability, incorporate increasingly more recycled materials, and to test reusable solutions.

We promote waste recovery in our own operations and also raise the awareness of and engage our Companies' business partners and customers to encourage them to do the same.

The measures implemented to fight food waste are explained in more detail in subsection 3.2.2. “Resource use and circular economy”, point “Actions to promote circular economy”, subpoint “Fighting food waste”, of this subchapter.

Due diligence relating to the financial assessment of these risks and opportunities will be integrated within the phase-in period stipulated by the sustainability reporting standards.

Materials used and resource outflows

[ESRS 2 MDR-M; ESRS E5-5]

[GRI 301-1; GRI 301-2]



Main materials used

Total consumption (tonnes/million euros in sales)	2024	2023	Δ 2024/2023
Specific value	15.13	16.99	-10.9%

Total material consumption (tonnes)	2024	2023	Δ 2024/2023
Consumption by business unit	506,183	*520,129	-2.7%
Biedronka	382,343	395,563	-3.3%
Hebe	1,321	1,023	+29.1%
Pingo Doce ²⁹	66,025	64,272	+2.7%
Recheio	13,409	*13,326	+0.6%
Ara	43,085	45,945	-6.2%
Private Brand product packaging (by type)	476,803	490,953	-2.9%
Paper and cardboard	199,538	201,520	-1.0%
Cardboard packaging for liquid products**	15,176	15,529	-2.3%
Plastic	148,634	162,837	-8.7%
Glass	86,740	83,685	+3.7%
Steel	20,349	21,470	-5.2%
Other materials***	6,366	5,912	+7.7%
Service packaging (by type)	15,716	13,430	+17.0%
Plastic	10,360	8,736	+18.6%
Paper and cardboard	4,811	4,217	+14.1%
Other materials***	545	477	+14.3%
Other consumption	13,666	15,745	-13.2%
Office paper	953	992	-3.9%
Promotional leaflets	11,464	*12,708	-9.8%
Publications	1,249	2,045	-38.9%

* Values corrected due to updated calculations.

** Composite packaging used to package products such as juices, milks and creams, among others.

*** Includes aluminium, wood and other materials.

Incorporated recycled materials (tonnes)	2024	2023	Δ 2024/2023
By business unit*	212,647	220,310	-3.5%
Biedronka	169,885	180,230	-5.7%
Hebe	70	84	-16.1%
Pingo Doce ¹⁶ 29	23,219	23,241	-0.1%
Recheio	5,453	4,544	+20.0%
Ara	14,020	12,211	+14.8%
By type*			
Paper and cardboard	168,741	178,492	-5.5%
Plastic	12,142	11,545	+5.2%
Glass	31,764	30,273	+4.9%

* Includes Private Brand product packaging and service packaging.

In 2024, total material consumption decreased 2.7%, due mainly to a reduction in the amount of plastic and paper packaging for Private Brand products. The specific value, which measures total material consumption per million euros in sales, decreased 10.9%, on top of the 11.2% decrease recorded in 2023.

²⁹ The distribution centres, central buildings and trucks used to distribute goods were accounted for under Pingo Doce.

In 2024, service and Private Brand product packaging incorporated 43.2% of recycled materials, 0.5 p.p. less than in 2023, particularly paper and cardboard, plastic and glass. Paper and cardboard packaging contained around 80% recycled materials. In total, around 200 thousand tonnes of recycled materials were used, 3.5% less than in the previous year.

Single-Use Plastics (SUP)

As a signatory of the New Plastics Economy Global Commitment (launched by the Ellen MacArthur Foundation and UNEP - United Nations Environment Programme) and members of the Portuguese Plastics Pact, the Polish Plastics Pact (through Biedronka), the Colombian Plastics Pact (through Ara) and of The Consumer Goods Forum's Plastic Waste Coalition of Action, we have made several voluntarily commitments to reduce the use of single-use plastic. These commitments were defined with the aim of reducing the inflow and outflow of resources used, ensuring the promotion of circularity, by following a waste management hierarchy: reduce, reuse and recycle.

By the end of 2025, we have pledged to:

- ensure that all Private Brand plastic packaging is reusable or recyclable;
- incorporate at least 25% of recycled content in Private Brand plastic packaging;
- reduce specific plastic consumption by 10%, compared to 2018, measured in tonnes of plastic packaging per million euros in sales;
- reduce virgin plastic used in Private Brand packaging by 15%, compared to 2018.

Total SUP consumption (tonnes/million euros in sales)	2024	2023	Δ 2024/2023
Specific value	5.59	6.47	-13.6%

Total consumption (tonnes)	2024	2023	Δ 2024/2023
SUP use by business unit	187,066	198,158	-5.6%
Biedronka	128,195	136,331	-6.0%
Hebe	188	210	-10.5%
Pingo Doce	28,332	26,500	+6.9%
Recheio	6,004	5,767	+4.1%
Ara	24,347	29,350	-17.0%
SUP consumption by category			
Private Brand packaging	148,634	162,837	-8.7%
Service packaging	10,360	8,736	+18.6%
Check-out bags	9,322	10,163	-8.3%
Pallet wrap	3,328	3,234	+2.9%
Rubbish bags	15,331	13,083	+17.2%
Other SUP*	91	105	-13.3%

* Includes cutlery and stirrers for drinks, plates and bowls, cups, straws, and cotton buds (SUP includes Private Brand, exclusive brands and own consumption).

Incorporation of recycled plastic in SUP (tonnes)	2024	2023	Δ 2024/2023
By business unit	29,354	26,940	+9.0%
Biedronka	20,762	18,612	+11.6%
Hebe	46	42	+9.5%
Pingo Doce	5,719	5,676	+0.8%
Recheio	1,618	1,626	-0.5%
Ara	1,209	984	+22.9%
By category			
Packaging*	12,142	11,545	+5.2%
Check-out bags and wrapping film	7,725	8,168	-5.4%
Rubbish bags and other SUP**	9,487	7,227	+31.3%

* Includes Private Brand product packaging and service packaging.

** Includes cutlery and stirrers for drinks, plates and bowls, cups, straws, and cotton buds (SUP includes Private Brand, exclusive brands and own consumption).

Incorporation of virgin plastic in SUP (tonnes)	2024	2023	Δ 2024/2023
By business unit	157,713	171,217	-7.9%
Biedronka	107,435	117,719	-8.7%
Hebe	142	169	-16.0%

Incorporation of virgin plastic in SUP (tonnes)	2024	2023	Δ 2024/2023
Pingo Doce	22,612	20,823	+8.6%
Recheio	4,386	4,140	+5.9%
Ara	23,138	28,366	-18.4%
By category			
Packaging*	146,852	160,028	-8.2%
Check-out bags and wrapping film	4,925	5,229	-5.8%
Rubbish bags and other SUP**	5,936	5,961	-0.4%

* Includes Private Brand product packaging and service packaging.

** Includes cutlery and stirrers for drinks, plates and bowls, cups, straws, and cotton buds (SUP includes Private Brand, exclusive brands and own consumption).

The consumption of single-use plastic (SUP) decreased 5.6% compared to 2023. SUP accounted for 34% (1.7 p.p. less than in 2023) of the materials used in Private Brand product packaging and service packaging, in check-out bags and pallet wrap. Of the total SUP in these categories, 19,867 tonnes were recycled plastic, corresponding to 11.6%.

In 2024, the use of virgin plastic decreased 7.9% compared to the previous year, 4.2% less than in the reference year (2018). In recent years, market conditions for collecting packaging waste and the amount of recycled plastic available for reincorporation into new packaging, especially those used for food, have changed little in the countries where our Companies are located. It will therefore be difficult to achieve two of our plastic-related commitments by 2025, that is:

- incorporating at least 25% of recycled plastic in plastic packaging;
- reducing the use of virgin plastic by 15% compared to 2018.

As regards the goal of reducing specific plastic consumption by 10% compared to 2018, measured in tonnes of plastic packaging per million euros in sales, in 2024 we were able to reduce specific plastic consumption by 42%, surpassing the target set in 2024.

By applying the Ellen MacArthur Foundation's Recyclability Assessment Tool methodology, we determined that 57.1% of the plastic packaging of our Private Brand products is recyclable (15.1 p.p. more than in 2023). This figure takes into account the different polymers and plastic packaging formats, and the existence and effectiveness of sorting and recycling systems in the countries where we have operations.

Although our Companies have successfully completed numerous mono-material packaging projects, even where a recycling industry has been set up, there are still no sorting solutions for some flows (e.g. multi-layer polypropylene flexible plastics and hard polystyrene packages). Because of this, some plastic packaging formats are still classified as "non-recyclable" according to the aforementioned methodology, even where sorting and downcycling³⁰ circuits exist locally, as is the case in Poland and in Portugal. To increase the recyclability of the plastic packaging of our Private Brands, we have been eliminating problematic components (e.g. PVC and EPS polymers) that hinder recycling or reduce the quality and value of the recycled material. In line with our commitment, these components were eliminated from 91.8% of our packaging in 2024, the same as in 2023.

Waste management

[ESRS E5-5]

[GRI 306-3; GRI 306-4; GRI 306-5]

Our businesses produced over 634,000 tonnes of waste, 7% more than in 2023, due to the growth of our Companies' operations, as well as our increasing specialized perishable offer, namely at Biedronka. When taking tonnes of waste produced per million euros in sales into account, there was a 2.2% reduction in waste compared to 2023.

³⁰ Recycling process whereby the resulting materials are of an inferior quality to the original ones, so that the same products with the same quality cannot be manufactured, only those that require lower quality material.

Waste produced (tonnes/million euros in sales)	2024	2023	Δ 2024/2023
Specific value	18.96	19.38	-2.2%

Waste produced (tonnes)	2024	2023	Δ 2024/2023
By type of waste	634,337	593,064	+7.0%
Cardboard and paper	372,044	357,693	+4.0%
Plastic	17,087	16,069	+6.3%
Wood	2,634	2,178	+20.9%
Organic waste	124,942	111,636	+11.9%
Unsorted waste	100,312	87,301	+14.9%
Cooking oil and fats	231	167	+38.3%
Effluents treatment waste	11,929	12,751	-6.4%
Hazardous waste	433	387	+11.9%
Other waste	4,725	4,882	-3.2%
By business unit			
Biedronka	475,577	445,082	+6.9%
Hebe	1,296	1,156	+12.1%
Pingo Doce	102,020	93,994	+8.5%
Recheio	7,640	7,222	+5.8%
Ara	44,062	42,020	+4.9%
JMA	3,742	3,590	+4.2%

Actions to promote a circular economy

[ESRS 2 MDR-A; ESRS E5-2]



Ecodesign of packaging

Implemented over a decade ago, our ecodesign packaging project seeks to optimise the packaging of our Private Brand and perishable products, maintaining product integrity and including the following objectives:

- reduce the amount of material used;
- promote circular packaging by incorporating recycled materials into its composition and increasing recyclability;
- rework the size, weight and shape of packaging, to enable more product quantities to be transported in each journey.

Since its launch in 2011, we have avoided the use of 50,351 tonnes of materials as a result of the more than 2,300 changes made, including around 1,000 FSC® or similar certified packages. We calculate that the ecodesign packaging project also helped avoid the emission of 6,882 tonnes of carbon equivalent, as a result of increased transport efficiency.

Closed Loop at Biedronka

The Closed Loop project involves the collection of used paper boxes from Biedronka stores, which are then recycled and transformed back into raw material for the manufacture of new cardboard boxes used to display Private Brand products in the Company's stores. Launched in 2022, a dedicated symbol has been used to identify these recycled boxes since 2023. In 2024, we collected 8,322 tonnes of cardboard and transformed it into more than 31.6 million new boxes.



In 2024, we implemented 454 ecodesign packaging projects (262 at Biedronka, 85 at Hebe, 72 at Pingo Doce, 21 at Ara and 14 at Recheio), achieving 25,7% of Private Brand packaging changed since 2011.

As regards the reusability of plastic packaging, in 2024 we determined that 1.1% of this packaging was reusable (0.2 p.p. less than in 2023), according to the Ellen MacArthur Foundation's proposed method for reporting this indicator to the Global Commitment.

Packaging ecodesign – highlights from 2024

Biedronka – Kraina Mięs pork vacuum packs now have an absorbent pad made entirely from FSC® certified cellulose, replacing the plastic pads and meeting the required expiry dates. These changes have helped avoid 55 tonnes of plastic per year.

Pingo Doce – the packaging of Mini Bolachas Salgadas 350 g, consisting of a jar and lid, now incorporates 30% recycled PET in the jar, avoiding 4 tonnes of virgin plastic per year.

Recheio – five Amanhecer products launched with FSC® certified cardboard packaging.

Ara – the size of the plastic labels on 13 fresh meat products was reduced, avoiding 2.7 tonnes of plastic per year.

Hebe – the paper used in the packaging of 85 Private Brand products is now FSC® certified.

Reusable packaging

The use of reusable packaging in our operations enables us to avoid disposable packaging. In 2024, reusable boxes for perishables avoided the use of over 42,000 tonnes of disposable packaging, 5% more than in 2023.

Pingo Doce and Recheio use a pool of boxes to pack and transport perishables between central kitchens, distribution centres and shops. This system has made it possible to reuse these boxes 44 million times. At Biedronka, this figure stood at 21.2 million uses for bakery products, while Ara recorded more than 19 million uses of reusable boxes to transport bottled water, milk, meat, and fruit and vegetables.

The ECO plastic bottle refilling station, available at Pingo Doce, is another example of our reusable packaging solutions. This solution has been extended to 310 stores, 26 more than in 2023, avoiding the consumption of 101 tonnes of single-use plastic in 2024, 3% less than the previous year, as a result of a decrease in the refilling of the largest volume formats (6 L and 3 L).

Reusable solutions for transporting customers' shopping

Material used by type of solution	2024	2023	Δ 2024/2023
Reusable paper check-out bags (tonnes)	1,439	1,024	+40.5%
Biedronka	1,221	906	+34.8%
Hebe	16	15	+6.7%
Pingo Doce	95	101	-5.9%
Recheio	0	0	-
Ara	107	2	+5,250.0%

Material used by type of solution	2024	2023	Δ 2024/2023
Single-use plastic check-out bags* (tonnes)	9,064	9,548	-5.1%
Biedronka	6,468	7,069	-8.5%
Hebe	43	44	-2.3%
Pingo Doce	2,342	2,199	+6.5%
Recheio	7	8	-12.5%
Ara	204	228	-10.5%
Trolleys (units)	30,736	32,955	-6.7%
Biedronka	0	0	-
Hebe	0	0	-
Pingo Doce	30,722	32,950	-6.8%
Recheio	14	2	+600.0%
Ara	0	3	-100.0%

* Includes different sized resistant bags and materials that can be used multiple times.

Consumption of paper bags increased significantly, particularly at Biedronka and Ara. In the case of Biedronka, consumers opted for paper bags given the reduced availability of plastic check-out bags. At Ara, the entry into force in July 2024 of legislation regulating the use of plastic bags in Colombia saw an increase in the paper alternative.

Our Companies stopped providing plastic check-out bags for free in 2017. In 2024, the purchase of reusable bags by our customers decreased 5.1%. These bags incorporate in quantity between 50% and 85% of post-consumer recycled plastic (corresponding to a total of around 7,400 tonnes in 2024). The reusable polyethylene plastic bags available at Biedronka and Pingo Doce are Blue Angel certified.

Paper bags at Biedronka and Pingo Doce contain a minimum of 70% recycled material (1,028 tonnes in 2024).

Promoting bulk sales

Besides selling fruit and vegetables by weight in most of our food distribution stores, we also offer this option in other categories.

Biedronka and Pingo Doce stores sell sweets and nuts in bulk. In 2024, Biedronka sold 33.4 tonnes of bulk products (a service available in all of its stores) and Pingo Doce sold 158 tonnes (available in 40% of its stores).

Ara offers the bulk sale of rice, sugar, beans and lentils in 300 stores (21% of the chain). In 2024, 5.3 tonnes of these products were sold, 61% less than in 2023, due to restrictions imposed by the Colombian authorities.

Fighting food waste

We are committed to limiting annual food waste to 2.5% of the total sales volume (tonnes) of foodstuffs in the period from 2024 to 2026. This target is an intermediate step towards our goal of contributing to target 12.3 of Goal 12 - Responsible Consumption and Production of the United Nations Sustainable Development Goals.

Our commitment to transparency is evidenced in the fact that we were the first retailer in Portugal to calculate and publicly disclose our food waste footprint, in line with the methodology of the World Resources Institute's Food Loss and Waste Protocol, enabling us to ensure that these objectives are accounted for and monitored.

We continued to fight food waste throughout 2024. Nevertheless, our increasing specialisation in fresh products (products with a low level of processing) presents challenges due to the short shelf life, which

limits the effectiveness of these actions. Around 70% of the food waste generated in own operations is in the perishables category.

Food waste*	2024	2023	Δ 2024/2023
Specific Values			
Wasted food per food sold and wasted (%)	1.8%	1.7%	+0.1 p.p.
Food wasted per food sold (in kg/t)	19.9	18.5	+7.6%
Destination (kg of food wasted/tonne of food sold)			
Animal feed and bioprocessing	1.4	1.0	+40.0%
Anaerobic digestion, composting and controlled combustion	11.7	11.2	+3.6%
Landfill, incineration and wastewater treatment systems	6.8	6.2	+9.7%
By business unit (kg of food wasted/tonne of food sold)			
Biedronka	21.6	19.6	+10.2%
Pingo Doce**	20.0	22.1	-9.5%
Recheio	5.4	4.0	+35.0%
Ara	15.3	14.5	+5.5%

* According to the Food Loss and Waste Protocol, food not used for human consumption is considered food waste.

** The food waste generated at distribution centres was accounted for under Pingo Doce, although the facilities are shared with Recheio.

Note: The calculation assumptions are available at <https://www.jeronimomartins.com/cr-policies/>.

In 2024, we recorded 19.9 kg of food waste per tonne of food sold, an increase of 7.6% compared to 2023. Annual food waste in relation to the volume of food sales increased 0.1 p.p. to 1.8%, but is still within our target for 2024-2026 (2.5%).

At Biedronka, the increase is due to the growing supply of perishable products. Pingo Doce launched the "Alimenta o Bairro" (Feed the Neighbourhood) project, aimed at donating more food from Pingo Doce stores to local organisations, previously selected according to strict standards, thus fighting hunger in the local community and food waste in stores. For more information about this initiative, see subchapter 4. "Social information", subsection 4.2.2. "Affected Communities", point "Direct support for affected communities", of this chapter.

The initiatives we have carried out up and downstream of our value chain and in our own operations to fight food waste³¹ have enabled us to recover 83,3 thousand tonnes of food (70,7 thousand tonnes in 2023), corresponding to around 55 thousand tonnes of carbon dioxide avoided (46,3 thousand tonnes of CO₂e in 2023).

For instance, the incorporation of ungraded food (or "ugly" vegetables with the same nutritional profile as graded products) into the soups we produce in Portugal and Poland, and into 4th range products (washed and pre-cut ready-to-use vegetables) sold at Pingo Doce and Recheio stores. Between 2015 and 2024, these initiatives prevented around 137 thousand tonnes of food from being wasted.

A markdown has been implemented at Pingo Doce since 2019 and at Biedronka since 2020. This initiative involves selling products that are close to their sell-by date at reduced prices and was implemented in 935 stores in 2024. Over 38 thousand tonnes of food waste have been avoided since 2019 through this measure.

Pingo Doce also incorporates leftover roast chicken and roast suckling pig into various products available at the takeaway counter, such as pizzas, salads and sandwiches (avoiding 276 tonnes of food waste in 2024).

Biedronka's partnership with Too Good To Go since 2023 has been extended to 776 stores, 276 more than in 2023. In 2024, around 1.5 million bags were delivered, preventing an estimated 2,280 tonnes of food from being wasted (42% more than in 2023).

Pingo Doce sells salmon heads at its fish counters at reduced prices, avoiding 181 tonnes of food waste in 2024. Food such as golden apples, Rocha pears, persimmons, green beans and carrot sticks falling outside

³¹ More information is available on our [website](#).

of specification were also sold. Together, these initiatives helped avoid around 1,600 tonnes of food waste. Pingo Doce also cuts larger fruit (melons, watermelons, cantaloupes, papayas and pineapples) into halves so that customers can buy the quantity they want and avoid waste in stores and at home.

Our Companies also regularly donate food to charities. In 2024, a total of 18,600 tonnes of food was donated through our stores and distribution centres, 3% less than in 2023. For more information about these donations, see subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.2. "Affected communities", point "Direct support for affected communities", of this chapter. Employees are trained in order to ensure that food safe for donation is identified, selected and separated.

Along with these measures, our Companies also hold campaigns to raise consumer awareness through their social media pages, leaflets and in-store communication, and publish recipe books to make use of leftover food. More information about these actions is available on our [website](#).

In 2024, Recheio was the first wholesale company in Portugal to receive the "Sustainable Production, Responsible Consumption" seal from the National Commission for Combating Food Waste (CNCDA), joining Pingo Doce. This seal is awarded to public and private organisations that carry out actions to prevent, reduce or monitor food waste.

JMA also helps to fight food waste by incorporating by-products from the food industry and ungraded vegetables into Best Farmer's cattle feed. Between 2018 and 2024, JMA used 83 thousand tonnes of this type of food.

Waste recovery from operations

[ESRS 2 MDR-M; ESRS E5-5]

[GRI 306-4; GRI 306-5]

As an end-of-line solution, we strive to ensure that as much waste as possible is sent for recovery, in line with the principles of the circular economy. In 2024, our waste recovery rate was 84.8%, with 14.7% of waste going to landfill.

Waste recovery and destination in operations

Waste recovery rate	2024	2023	Δ 2024/2023
Overall value	84.8%	85.4%	-0.6 p.p.
Biedronka	90.0%	91.5%	-1.5 p.p.
Hebe	78.4%	79.7%	-1.3 p.p.
Pingo Doce	65.2%	64.3%	+0.9 p.p.
Recheio	70.3%	72.4%	-2.1 p.p.
Ara	75.7%	70.7%	+5.0 p.p.
JMA	92.4%	88.6%	+3.8 p.p.

Waste management methods	2024	2023	Δ 2024/2023
Recovery*	84.8%	85.4%	-0.6 p.p.
Landfill	14.7%	13.5%	+1.2 p.p.
Incineration (without energy recovery)	0.0%	0.1%	-0.1 p.p.
Other destinations without recovery	0.4%	1.0%	-0.6 p.p.

*Includes sending waste for recycling, organic recovery, and incineration with energy recovery.

Customer waste recovery

[ESRS 2 MDR-M]

[GRI 301-3; GRI 306-2; GRI 306-3; GRI 306-4]

In addition to separating waste for recovery in our own operations, we provide solutions (such as recycling bins and other waste collection systems) to make life easier for our customers, including for³²:

- the collection of small electrical appliances, used cooking oil and light bulbs at 98% of the Pingo Doce store network;
- the collection of used batteries at all Pingo Doce and Recheio stores;
- the collection of small electrical appliances and used batteries at 93% of Biedronka stores;
- the collection of used batteries at 71% of Ara stores;
- the collection and recycling of coffee pods at Pingo Doce stores (which helped raise 2,230 euros for charity).

Recheio, in partnership with Novo Verde (a waste management company), encourages the separation of plastic and metal packaging waste by its HoReCa customers. Between May 2023 and December 2024, the store in which the project was implemented recorded 21,000 uses of the recycling bins by customers and the collection of more than 108 tonnes of waste;

Pingo Doce partnered with a project that encourages consumers to return beverage containers. Around 136 tonnes of materials, such as PET, glass and aluminium, have been collected since the start of this initiative in 2019.

Waste collected in stores (tonnes)	2024	2023	Δ 2024/2023
Pingo Doce	626.08	648.44	-3.4%
Batteries	19.05	18.74	+1.7%
WEEE*	46.21	69.33	-33.3%
Used cooking oil	64.63	72.59	-11.0%
Coffee pods	496.19	487.8	9.23+17%
Recheio	2.15	0.20	+973.8%
Batteries	0.76	0.20	+371.3%
Coffee pods	1.39	0.00	-
Biedronka	349.24	300.33	+16.3%
Batteries	318.70	273.67	+165%
WEEE*	30.54	26.65	+14.6%
Hebe	0.05	1.20	-95.8%
Batteries	0.05	1.20	-95.8%
Ara	28.52	16.33	+74.6%
Batteries	0.16	0.16	0,0%
Used cooking oil	0.07	0.02	+250,00%
WEEE*	28.28	16.15	+75.1%

* WEEE – Waste Electrical and Electronic Equipment.

Our network of recycling bins remained available to customers at our stores in 2024, helping to introduce secondary raw materials into the value chain and promoting a more circular economy. The collection of customer waste at Biedronka increased as a result of awareness-raising campaigns and investments made. The increase in the collection of Waste Electrical and Electronic Equipment (WEEE) at Ara is due to

³² For more detailed information on the number and type of recycling bins available to customers, visit the "Responsibility" page at www.jeronimomartins.com.

a new partnership established in 2024 with an operator that has a greater capacity to manage and properly dispose of this waste.

Commitments

[ESRS 2 MDR-T; ESRS E5-3]



The Group's commitments related to this topic can be found in subchapter 6. "Sustainability commitments", of this chapter.

3.2.3. Water and marine resources

[ESRS 2 MDR-A; ESRS E3-2]



To counteract the increase in water consumption inherent in the expansion of our business, we have implemented good practices in our own operations to reduce the impact of our activity on the use of water resources, just as with energy consumption. These measures allow us to mitigate the risk of water scarcity in the places where we have operations, especially those with the highest water stress. To this end, we have incorporated several measures into our plan for refurbishing and opening new stores and other infrastructures, such as central kitchens, distribution centres and production units, including:

- installation of flow regulators;
- use of taps with timers;
- harvesting rainwater for use in irrigation or washing equipment;
- treating wastewater to prevent deterioration in water quality;
- investment on smart irrigation technologies that use weather and soil moisture data to determine irrigation needs on farms;
- using nighttime or drip irrigation systems to minimise evaporation losses;
- incorporating wet feed, ungraded products and by-products from the food industry into animal feed as they contain high moisture content, thereby reducing the need for water.

These technologies are complemented by awareness-raising activities targeting our employees, such as the "Water and Energy Consumption Management Teams" at Pingo Doce and Recheio, "Everyone for the Environment" at Pingo Doce, "Dobra energia" (Good energy) at Biedronka, and "Let's Go Green" in office buildings in Portugal, Poland and Colombia. These projects are described in more detail in section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", point "Support for biodiversity protection and ecosystem regeneration projects", of this subchapter.

We also implement measures to optimise water consumption and improve water quality in our supply chains. The sustainable agriculture project, which we promote among our fruit and vegetable suppliers, and environmental audits, which assess both water consumption and how our suppliers and service providers reduce water pollution impacts, are two examples. More information about these initiatives is provided in subchapter 5. "Business conduct", section 5.2. "Business conduct", subsection 5.2.2. "Supplier awareness and training". Our actions associated with water and marine resources, particularly fish, are described in subsection 3.2.4. "Biodiversity and ecosystems", point "Sustainable Fishing Strategy", of this subchapter.

Water consumption

[ESRS 2 MDR-M; ESRS E3-3: E3-4]

**Water withdrawal and reuse** [GRI 303-1; GRI 303-3]

Total consumption (m ³ /thousand euros in sales)	2024	2023	Δ 2024/2023
Overall specific value	0.189	0.212	-11.1%
Specific value (Distribution)	0.102	0.106	-4.7%
Specific value (Agribusiness)	20.386	28.711	-29.0%

Total withdrawal (m ³)	2024	2023	Δ 2024/2023
Water withdrawal by source*	6,315,041	6,500,463	-2.9%
Municipal and private supply system	6,002,472	6,165,917	-2.7%
Groundwater	294,000	316,375	-7.1%
Surface water (including rainwater)	18,569	18,171	+2.2%
Water withdrawal by business unit			
Pingo Doce	1,761,136	1,726,157	+2.0%
Recheio	84,192	88,612	-5.0%
Biedronka	974,441	940,997	+3.6%
Hebe	23,728	21,739	+9.2%
Ara	561,144	472,856	+18.7%
JMA	2,910,400	3,250,122	-10.5%

Recycled water (m ³)	2024	2023	Δ 2024/2023
Total recycled water**	2,828	2,386	+18.5%

* Total withdrawal volume corresponds to freshwater.

** Only at Ara.

Our goal is to reduce, by the end of 2026, the volume of water withdrawal in Distribution by 10% per thousand euros in sales, compared to 2021. In 2024, and compared to 2021, water withdrawal was reduced by 59% per thousand euros in sales.

In 2024, Portugal experienced higher rainfall compared to 2023, which explains the 2.9% decrease in water withdrawal, in absolute terms. JMA significantly reduced its own withdrawals (16.0% less) and consumption from private water supply (-10.9%) used for animal watering and irrigation needs, respectively.

The harvesting of rainwater and surface water for use in refrigeration systems, irrigation and the external washing of trucks increased 2.2% compared to 2023, due to water reuse at Recheio stores and at one of the distribution centres in Portugal. In Colombia, private water consumption increased 32.3% as a consequence of a year of drought.

More than 95% of withdrawn water used for our activities came from municipal or private supply systems. Groundwater and surface water accounts for the remaining 5%, for which we hold the required licences and is used for less demanding operations, such as irrigation and refrigeration systems.

Considering only the Distribution business, water withdrawal increased 4.7% in absolute terms compared to 2023, as a result of the opening of over 350 new stores. However, in 2024 the downward trend in specific consumption continued, falling by 4.7% (0.106 to 0.102 m³ per thousand euros of sales).

Water disposal [GRI 303-2; GRI 303-4]

Total wastewater (m ³)	2024	2023	Δ 2024/2023
Wastewater by type of destination*	2,927,136	2,809,033	+4.2%
Municipal sewage	2,874,175	2,757,262	+4.2%
Environment	52,961	51,771	+2.3%
Wastewater by business unit			
Pingo Doce	1,408,909	1,380,926	+2.0%
Recheio	67,353	70,890	-5.0%
Biedronka	779,553	752,782	+3.6%
Hebe	18,983	17,391	+9.2%
Ara	448,915	378,285	+18.7%
JMA	203,423	208,760	-2.6%

* It is estimated that the volume discharged corresponds to less than 0.5% of freshwater.

Wastewater discharged directly into the natural environment is licensed in accordance with local laws and is properly treated in the places where it is generated before being discharged. Discharged wastewater accounts for 1.8% of the total volume of wastewater generated by the Group, virtually the same as in the previous year (-0.03 p.p. compared to 2023), despite the expansion of our operations.

In the Distribution business, Pingo Doce has higher water consumption due to its strong focus on specialised perishables - such as fish and meat counters - which leads to higher water consumption for washing and sanitising these areas.

Water consumption* [GRI 303-1; GRI 303-5]

Total water consumed (m ³)	2024	2023	Δ 2024/2023
Water consumption by business unit	3,387,905	3,691,430	-8.2%
Pingo Doce	352,227	345,231	+2.0%
Recheio	16,839	17,722	-5.0%
Biedronka	194,888	188,195	+3.6%
Hebe	4,745	4,348	+9.1%
Ara	112,229	94,571	+18.7%
JMA	2,706,977	3,041,362	-11.0%

* Water consumption was calculated according to the Global Reporting Initiative (GRI) methodology, where water consumption is the difference between water withdrawal and water discharge.

Water stress [GRI 303-1; GRI 303-2]

Every year we perform water stress tests, associated with water withdrawal in our operations, to determine our exposure to the risk of a shortage of drinking water. To this end, we map the physical locations of the Companies' establishments and use the World Resources Institute (WRI) Aqueduct: Baseline Water Stress Class model.

Water stress class	Water withdrawal (m ³)		Water disposal (m ³)	
	Municipal and private supply system	Groundwater and surface water	Municipal sanitation	Environment
Total	6,002,472	315,397	2,874,175	52,961
Low	883,037	38,322	715,604	19,221
Low to medium	691,769	104,293	238,942	28,056
Medium to high	2,807,582	71,151	521,547	0
High	307,647	40,196	277,431	9
Extremely high	1,312,437	61,434	1,120,651	5,675
Drought	0	0	0	0
No data	0	0	0	0

In 2024, 27% of total water withdrawal (1,721,714 m³) had an "extremely high" or "high" water stress level. This figure corresponds to a decrease of 1,661 m³ compared to water withdrawn in 2023. The figures for both total water withdrawal with "extremely high" or "high" water stress and the decrease are similar to those recorded in 2023.

In terms of water disposal, the volume for both risk levels is of 1,403,766 m³, accounting for 48% of the total. Water discharged in "high" and "extremely high" water stress increased 0.04%, slightly compared to 2023.

To tackle the challenge that climate change poses to water availability, in 2024 JMA drew up a Water Management Plan to promote the adoption of mitigation and adaptation measures to improve water efficiency and to manage water scarcity during periods of low rainfall. Measures included in the Plan are:

- assessing water quality and availability on new and existing farms, in order to guarantee a suitable set of solutions to improve efficiency in the use of withdrawn water;
- adapting water sources according to their use, ensuring legal compliance with the use of own water resources;
- minimising water losses and ensuring efficient water use, prioritising the improvement in the efficiency of water supply systems before new investments are made;
- ensuring the monitoring and control of surface and groundwater resources, so that the current and future management of these resources is ensured;
- managing water management in the value chain through environmental protection initiatives.

Commitments

[ESRS 2 MDR-T; ESRS E2-3]



The Group's commitments related to this topic can be found in subchapter 6. "Sustainability commitments", of this chapter.

3.2.4. Biodiversity and ecosystems

[ESRS 2 IRO-1]

[GRI 304-1; GRI 304-2; GRI 304-3; GRI 304-4]



As experts in the sale of perishable products such as meat, fish, fruit and vegetables, we know how we impact and depend on biodiversity, in particular the variety of species that make up our offer, and on ecosystem services, such as pollination and the carbon cycle. Promoting the preservation and restoration of biodiversity helps ensure the resilience and sustainability of the production and distribution of the food we offer in our assortments. These are also the objectives of the Kunming-Montreal Global Biodiversity Framework, established during the UN Biodiversity Conference (COP 15).

To this end, we assess risks related to ecosystem services in accordance with the Ecosystem Services Review methodology proposed by the World Research Institute. It is based on this approach that we defined 11 priority action areas (e.g. agricultural crops, pollination, animal production, fish caught and aquaculture), based on the dependencies and impacts on ecosystem services of the activities of our Companies and their value chains. By 2026, and to enhance this assessment, our goal is to identify and quantify the financial effects of the impacts, risks and opportunities associated with biodiversity and with ecosystems.

Based on the results, we defined a set of actions covering the value chain of our perishables and Private Brand products:

- upstream, in collaboration with our suppliers;
- in own operations and downstream, by providing support for ecosystem conservation and restoration projects and raising employee and customer awareness of these topics.

Noteworthy initiatives include fighting deforestation, the Sustainable Fishing Strategy, animal welfare practices, and support provided for biodiversity protection and ecosystem regeneration projects.

These biodiversity commitments are also reflected in our 2024-2026 targets. For more information, see subchapter 6. "Sustainability commitments" of this chapter.

Fighting deforestation

[ESRS 2 MDR-A; ESRS 2 MDR-M; ESRS E1-4; E3-3; ESRS E4-3; ESRS E4-4]
[GRI 304-2]



Deforestation and land use conversion can result in the significant loss of forests and biodiversity. Around 90% of tropical forest loss, particularly in South America and Africa, is due to the expansion of agricultural activities. The complex relationship between agriculture and deforestation highlights the urgent need for sustainable practices that balance the need for food production with environmental conservation and socioeconomical development.

As food retailers, we know how important agricultural commodities are to our supply chains and the importance of High Conservation Value (HCV) forests and terrestrial ecosystems in fighting climate change, because of their capacity to sequester carbon from the atmosphere and the biodiversity they shelter. It is for this reason that we joined The Consumer Goods Forum Forest Positive Coalition of Action (FP CoA) and made ambitious commitments relating to the management of the main commodities linked to deforestation in our Private Brands and perishable products and packaging that contain palm oil, paper/wood, soy and beef. This coalition encourages its members to take collective and individual action to eliminate deforestation and forest conversion directly associated with the supply chains of these four commodities and to support the sustainable management, conservation and restoration of forests while respecting human rights.

Commitment to fighting deforestation recognised in 2024

Once more, we were awarded with the leadership level ('A-') in the CDP Forests Programme for our management of commodities associated with deforestation, assessed by CDP (Disclosure Insight Action): palm oil, soy, beef and paper/wood.

This score, which we obtained in 2019, 2020, 2022, 2023 and 2024, attests to the robustness and consistency of our commitments and actions to fight deforestation.

Our commitment is to ensure that, by the end of 2025, the palm oil, soy, paper/wood and beef used in our Private Brand and perishable products are deforestation- and conversion-free (DCF), particularly the commodities used as a direct ingredient in our chains.

We recognise that the use of these commodities in complex chains, such as soy used in animal feed or palm oil derivatives, poses additional challenges, which is why the food distribution sector encourages the involvement of the different economic actors along the supply chain to address them together. To monitor our progress and identify opportunities for improvement, we map the presence of ingredients linked to deforestation in our Private Brand products and perishables, collecting information on their origin and sustainability certification from suppliers, as well as their respective policies for fighting deforestation.

Main agricultural commodities with deforestation risk in Private Brand and perishables

Commodity	Total quantity (tonnes)		
	2024	2023	Δ 2024/2023
Palm oil	77,667	67,270	15%
Soy	513,486	499,206	3%
Soy (direct)	21,061	23,318	-10%
Soy (indirect)*	492,425	475,888	3%
Paper and timber	212,152	200,052	6%
Paper and wood (products)**	170,751	163,622	4%
Paper and wood (packaging)**	41,401	36,431	14%
Beef	40,337	41,094	-2%

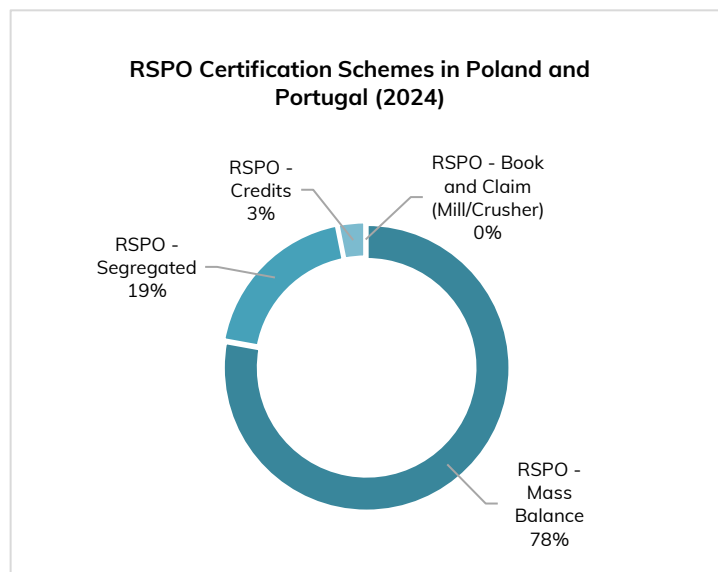
* Soy used in animal feed for the production of animal protein contained in products.

** Only virgin fibres; recycled fibres are excluded.

Palm oil

As in previous years, we have been using increasingly more palm oil in our Private Brand products, particularly at Ara, where around 90% of this ingredient is used in vegetable cooking oils, a very important product for the Colombian consumer.

In 2024, all of the palm oil used in our Private Brands and perishables in Poland and Portugal was RSPO (Roundtable on Sustainable Palm Oil) certified, with the vast majority certified according to the "Mass Balance" and "Segregated" schemes³³. In Portugal and in Poland, the use of palm oil in Private Brand products has decreased due to the reformulation of some products.



Although Colombia is one of the world's top five palm oil producers, the country's RSPO certification rate is low. This reality, combined with our strategy to encourage local sourcing in the countries where we have operations, makes it difficult to increase RSPO certification for palm oil produced in Colombia. Since 2021, Ara has been part of the "Acuerdo de Voluntades para la Deforestación Cero en la Cadena de Aceite de Palma en Colombia" (Voluntary Agreement for Zero Deforestation in the Palm Oil Chain in Colombia), with the aim of ensuring that the palm oil used in our Private Brand and perishable products does not contribute to deforestation. The Agreement, promoted by the Colombian government, is supported by several civil society organisations, including RSPO, Proforest, Tropical Forest Alliance, and the WWF. The initiative focuses on actions ranging from the traceability of palm oil (down to farm level), ensuring that this ingredient is not associated with deforestation, and also aims at ensuring that imported palm oil has sustainability certification, such as RSPO certification.

In 2024, approximately 75% (18 p.p. less than in 2023) of the palm oil used in Ara's Private Brand and perishable products originated in Colombia, 66% of which was RSPO certified (54 p.p. more than in 2023). The reduction in palm oil from Colombia was due to the greater materiality (20%) of this ingredient originating from Ecuador in Ara's assortment.

In 2024, we were able to trace the origin of 95% (4 p.p. more than in 2023) of Colombian palm oil used in Private Brand and perishable products back to the area of the farm where it was produced. Based on this information, we confirmed that the palm oil originated from the departments of Norte de Santander, Cesar, Magdalena, Meta and Casanare, located in three of the country's four palm oil producing areas (Central Zone, Eastern Zone and Northern Zone) and from 25 (out of 70) processing plants operating in Colombia. However, only 0.75% of the deforestation identified by public authorities in 2021 was linked to palm oil³⁴. The combination of traceability levels, increased RSPO certification, and the low rate of deforestation associated with palm oil in Colombia validates our DCF strategy for this commodity in this country.

Of the around 25% of the palm oil used in Ara's Private Brand and perishable products originated in Colombia, 59% was RSPO certified (39 p.p. less than in 2023). Due to the already mentioned increase in consumption of palm oil from Ecuador, Ara's main suppliers have been unable to secure RSPO certification for this origin. In 2025, we will work with suppliers to increase the RSPO certification rate of imported palm oil, with a commitment to ensure that it is not associated with deforestation or the conversion of HCV.

³³ Information about these certification schemes is available on the [RSPO website](#).

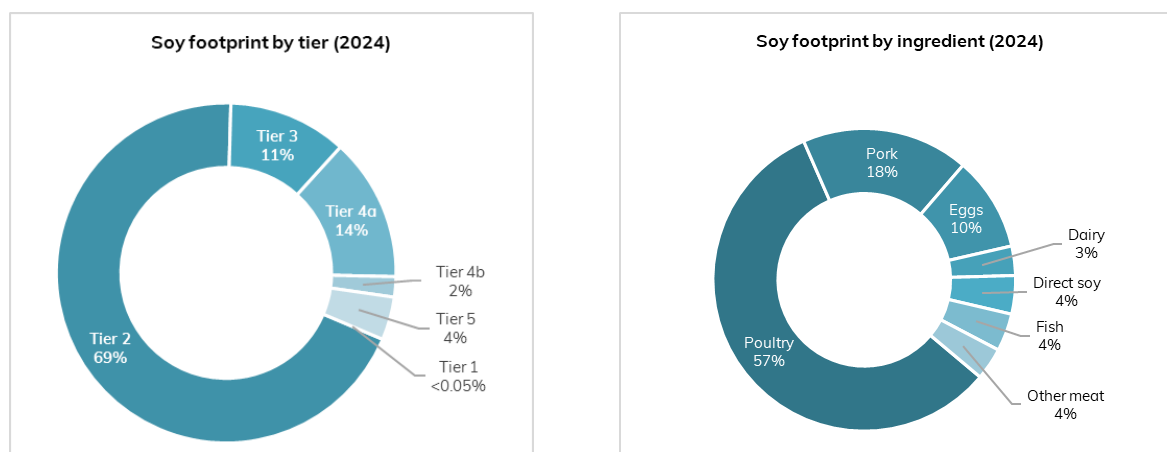
³⁴ Data disclosed in the analysis of the level of deforestation linked to palm oil production by IDEAM (2023) – Instituto de Hidrología Meteorología y Estudios Ambientales and the Colombian Ministry of the Environment.

Soy

In 2024, only 4% of total consumption corresponded to soy used as an ingredient (direct soy), specifically in vegetable oils and drinks. The 10% decrease in direct soy consumption is due to reformulations of the composition of vegetable cooking oils containing soy in Ara's Private Brand products.

Indirect soy, used in animal feed, accounts for more than 95% of total soy used for our Private Brand and perishable products (tiers 2 to 4b³⁵). Most of the soy in our supply chain (80%) is associated with specialised perishables in the meat and aquaculture fish categories (tier 2) and with non-specialised perishables, such as eggs and dairy products (tier 3). The remaining 16% is associated with processed foods that contain animal-origin ingredients (soy-fed), such as ready meals and sausages.

Approximately 57% of soy was associated with feeding poultry for meat (4 p.p. less than in 2023), 18% with feeding pigs (4 p.p. more than in 2023) and 10% with egg production (1 p.p. less than in 2023).



We maintained our commitment to tracing soy supply and managed to trace the origin, at least to the country of production, of 95% of the total soy in our supply chains (2 p.p. more than in 2023). We were unable to determine the origin of 5% of soy. The progress in soy traceability levels reflects the commitment and joint effort of our suppliers to increase the traceability of their own supply chains. This work with our suppliers will continue in 2025, with a special focus on poultry, pork and eggs, due to their importance in our supply chain.

Around 64% (6 p.p. less than in 2023) of the soy used in Private Brand and perishable products, in particular indirect soy, comes from countries at risk of deforestation³⁶, of which 17% (7 p.p. more than in 2023) had sustainability certification³⁷, such as Round Table on Responsible Soy (RTRS) or ProTerra certification.

Paper and timber

In 2024, higher demand for recycled fibres has created constraints on access to them, leading to a 6% increase on our use of virgin paper and wood fibres in Private Brand and perishable products.

Around 90% of the virgin fibres used in our Private Brand products and packaging had sustainability certification (FSC®, PEFC or SFI), in line with our goal of ensuring the certification of 100% Private Brand products and packaging by 2030.

We were able to trace the origin of around 90% of the virgin fibres used, at least, to country level. This analysis showed that around 16% (10 p.p. more than in 2023) of all virgin paper and wood fibres in products and packaging come from countries with a non-negligible or unknown risk of deforestation. We

³⁵ The five tiers of soy quantification in the supply chain are taken into account, in accordance with the CGF's "Calculation guidelines for the measurement of embedded soy usage in consumer goods businesses" methodology, available at [here](#).

³⁶ In 2024, the FP CoA revised the list of countries considered as having a non-negligible risk of deforestation associated with agricultural soy production. They are Argentina, Brazil and Paraguay, with Bolivia and Uruguay now removed from the list.

³⁷ In 2024, the FP CoA updated its list of recommended DCF certification schemes and Voluntary Sustainability Standards (VSS). More detailed information is available here: [Soy DCF Methodology](#)

seek to mitigate this risk by incorporating commodities with FSC®, PEFC or SFI certification, which accounted for 85% of total virgin fibres used that originated from countries with a non-negligible or unknown risk of deforestation.

Paper and timber products

Use of virgin paper and wood fibres in Private Brand products increased in 2023, due to the launch of new products and increased sales, particularly at Biedronka.

In 2024, we were able to trace all virgin fibres back to the country of origin and found that 6% are from countries with a non-negligible risk of deforestation³⁸, of which 79% come from sustainably managed forests, as they are FSC®, PEFC or SFI certified.

Paper and timber packaging

In the case of paper and wood used in packaging, about 80% of the fibres are recycled. As regards the remaining 20%, which corresponds to virgin fibres, we found that around 58% are from countries with a non-negligible or unknown risk of deforestation. Of these, 88% is FSC® or SFI certified.

As a food retailer, this is a complex supply chain for us, as we do not purchase packaging directly, which makes the traceability of the virgin fibres used in packaging very difficult. Nevertheless, we will continue to work with our suppliers to increase the traceability of virgin paper and wood fibres used.

Beef

As in the previous year, in 2024 we were able to map and trace all the beef used in our Private Brand and perishable products to at least the country of origin. Based on this work, we concluded that 0.4% of total beef was sourced from Brazil, a country associated with deforestation risk in cattle production³⁹. Despite the reduced exposure we have for this ingredient, we continue to participate in the beef working group within the framework of the CGF's Forest Positive Coalition of Action. We are committed to integrating, together with our suppliers, more sustainable production practices in order to create synergies and increase information sharing between our direct suppliers and the meatpackers of non-negligible risk countries.

In 2024, we continued to invest in multi-stakeholder initiatives aimed at supporting the preservation and regeneration of ecosystems, in line with the 10 principles defined by the FP CoA⁴⁰.

³⁸ The countries considered as having a non-negligible risk of deforestation associated with the agricultural production of paper and wood correspond to those defined in the [CGF guidelines](#) (Argentina, Indonesia, Malaysia, United States of America and Vietnam).

³⁹ The FP CoA is currently reviewing the list of countries considered as having a non-negligible deforestation risk associated with cattle production. According to the preliminary version, these origins would represent around 3% of total beef used in our Private Brand and perishable products.

⁴⁰ For more detailed information, see our [website](#).

Sustainable landscapes in Mato Grosso (Brazil)

In line with the CGF's FP CoA objectives, in 2024 we continued to financially support the project in Mato Grosso, the Brazilian state with the highest agricultural production, in collaboration with the Amazon Environmental Research Institute (IPAM), Nestlé and Sainsbury's. This initiative follows the 10 principles established by the Coalition and enabled, in 2024, the development of a local governance model in another two municipalities, Diamantino and Alto do Paraguai, and the consolidation of the model in the municipalities of Campos de Júlio, Campo Novo de Parecis, Sapezal, and Tangará da Serra.

Significant progress has been made in several areas, including the start of construction of a seed nursery to help restore degraded areas. This initiative is being carried out with the aim of promoting agroforestry systems that optimise land use by balancing ecosystem conservation with agricultural production.

RTRS certification was secured for soy production on some farms and regenerative agriculture techniques have also been implemented, promoting carbon sequestration, improving soil fertility and reducing the need to use chemical products.

In terms of social safeguards, of note is the development of a human rights guide for working with indigenous peoples and local communities, aimed at promoting respect for cultural and social specificities in the processes of restoring degraded areas and soy production.

Also noteworthy is the review of Tangará da Serra's municipal legislation on payments for ecosystem services, which expands payment options and prioritises the efforts made by farmers to maintain the most critical watersheds.

The progress made thus far underscores the success of collaborative participatory governance, technical innovation and community engagement strategies.

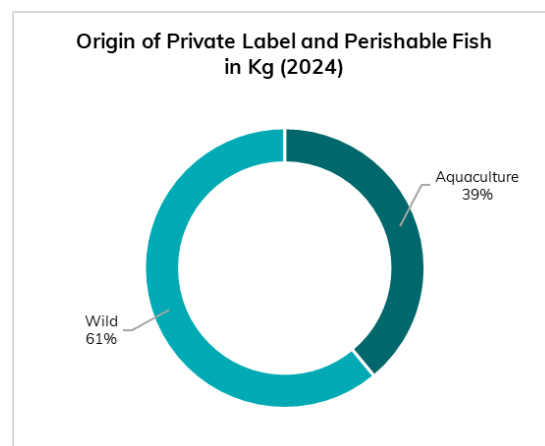
Sustainable Fishing Strategy

[ESRS 2 MDR-A; ESRS 2 MDR-M; ESRS E3-2; E3-3; ESRS E4-3]
[GRI 304-2; GRI 304-4]



Marine ecosystem conservation is essential to ensuring the sustainability of fishing activities. To this end, we ensure that our Private Brand and perishable fish products do not contribute to the overexploitation, depletion or extinction of species.

In 2024, we sold more than 200 species of fish, continuing to invest in diversifying our assortment as a way of reducing pressure on the most consumed fish species. The share of wild-caught fish decreased compared to the previous year (7 p.p. less), accounting for 61% of total consumption, while fish sourced from aquaculture accounted for 39% (up 7 p.p. compared to 2023). The share of fish sourced from aquaculture increased as a result of the consolidation of the investments we have made in this system, which can help to reduce the pressure on wild fish stocks, particularly on species most sought after by consumers, such as salmon, sea bream, sea bass, shrimp and trout.



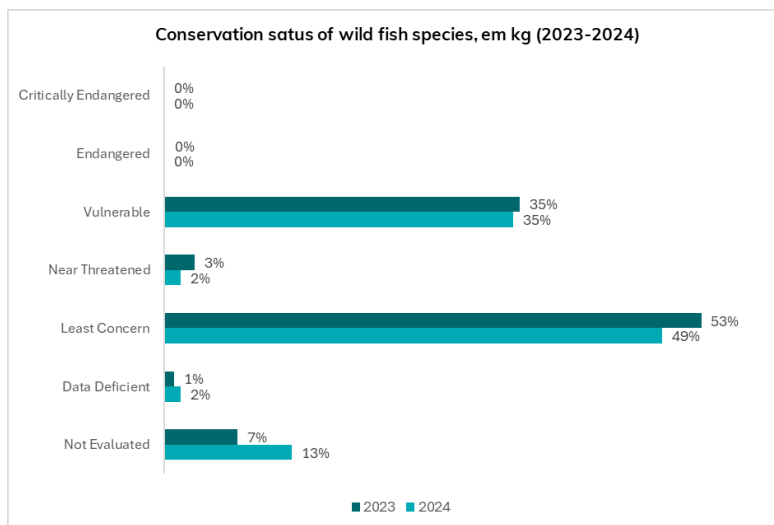
Impact assessment and mitigation actions

In 2024, and in line with our commitment to annually monitor the conservation status of the wild-caught fish species sold in our stores, we once again carried out this assessment using data from the IUCN⁴¹. The IUCN

⁴¹ Assessment is carried out using 2024 data from the IUCN Red List of Threatened Species, accessed through the [Integrated Biodiversity Assessment Tool](#) (IBAT). This data is provided by BirdLife International, Conservation International, IUCN and UNEP-WCMC.

categorises the different levels of threat as follows: Vulnerable (low risk), Endangered (medium risk) and Critically Endangered (high risk)⁴². The Not Evaluated, Data Deficient, Least Concern or Near Threatened categories are not considered threatened categories.

Like the previous year, around 35% of wild-caught fish in our Private Brands and perishables were listed as Vulnerable (representing the lowest level of risk) and more than half (51%) of our wild-caught fish purchases do not present a conservation risk (Near Threatened and Least Concern categories). The purchase of fish listed as 'Not Evaluated' by the IUCN also increased (6 p.p. more compared to 2023), due to the sale of the *Merluccius hubbsi* hake species, of which there were no purchases in 2023. No purchases of species considered Critically Endangered or Endangered were made.



We have defined concrete actions to mitigate the negative impacts of our activity on marine ecosystems for each of the three levels of conservation risk (high, medium and low), including:

- banning the purchase and sale of species listed as high risk (Critically Endangered) and for which there are no specific extraordinary permits or whose aquaculture production is not ensured across all stages of its life cycle.
- banning the sale of species listed as medium risk (Endangered) whenever they are not 100% sourced from aquaculture and/or from sustainably managed stocks and/or that do not have a certificate of sustainability (e.g. MSC or ASC).
- limiting promotional activities with species listed as low risk (Vulnerable) whenever they are not sourced from aquaculture and/or from sustainably managed stocks and/or that do not have a certificate of sustainability (e.g. MSC or ASC).

The table below depicts the level of compliance with the commitments at each of the three levels of conservation risk⁴³.

IUCN Red List category	Commitment	Compliance in 2024
Critically Endangered	Only the European eel (<i>Anguilla anguilla</i>) ⁴⁴ falls into this risk category. We stopped selling this species in our stores in 2016. In the assessment carried out in 2022, two other commercial species were identified under this level of risk: the Siberian sturgeon (<i>Acipenser baerii</i>) and the school shark (<i>Galeorhinus galeus</i>). In 2024, we only sold the species <i>Acipenser baerii</i> , ensuring that it was sourced from aquaculture for its entire life cycle.	100%
Endangered	We identified seven species falling under this category, to which we applied the foregoing measure: shortfin mako (<i>Isurus oxyrinchus</i>); striped catfish (<i>Pangasianodon hypophthalmus</i>) ⁴⁵ ; smooth-hound (<i>Mustelus mustelus</i>); black hake (<i>Merluccius senegalensis</i>); undulate ray (<i>Raja undulata</i>), sandy ray (<i>Raja circularis</i>) and American plaice (<i>Hippoglossoides platessoides</i>).	100%
Vulnerable	We identified 15 species in this risk category, for which we limited promotional activities.	100%

⁴²For the purposes of this analysis, the Extinct in the Wild category is not considered since the species analysed are caught in the wild.

⁴³ More information available at <https://www.iucn.org/>.

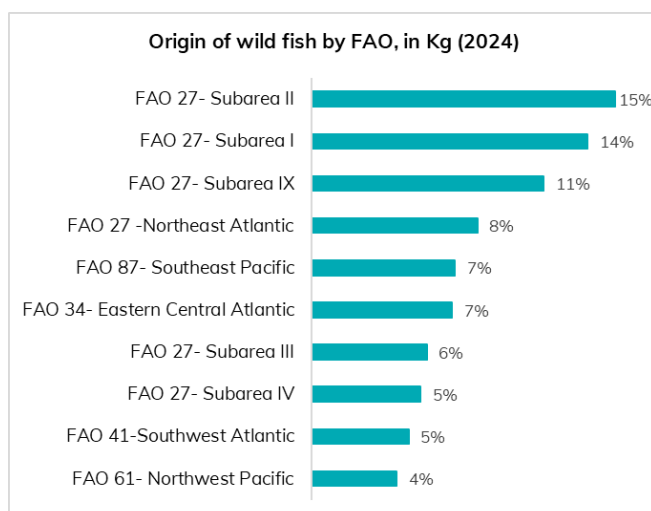
⁴⁴ Although the European eel is produced from aquaculture, these production systems rely on the collection of "young" specimens (glass eels) from natural environments, which puts pressure on wild populations.

⁴⁵ 100% from aquaculture.

Traceability and biodiversity preservation

Our commitment to preserving marine ecosystems is evident in the diversity of FAO areas from which we source more than 80% of the wild-caught fish we sell. In 2024, approximately 60% of our assortment was sourced from FAO Area 27 - Northeast Atlantic⁴⁶. Other important fishing areas include FAO Area 34 - East Central Atlantic (7%), FAO Area 87 - Southeast Pacific (7%), FAO Area 41- Southwest Atlantic (5%) and FAO 61 - Northwest Pacific (4%). Analysing traceability down to catch area level confirmed that more than half of the wild-caught fish sold in our stores sourced from these regions has no conservation risk (50% listed as Least Concern and 1% as Near Threatened), and 33% is listed in the lowest conservation risk category (Vulnerable). Around 17% of wild fish have not been assessed or have insufficient data on their conservation status.

As regards the sustainability status of fish stocks in the two most representative subareas [Norwegian Sea, Spitzbergen and Bear Island (FAO 27.2), and the Barents Sea (FAO 27.1)], the wild-caught fish listed as “Vulnerable” represents 48% and 93% respectively. In both regions, this assessment reflects the predominance of Atlantic cod (*Gadus morhua*) in our fish assortment, which is also listed as Vulnerable. This species has been subject to strict monitoring and management to ensure sustainable fishing. Cod populations in these areas vary greatly, with periods of abundance followed by declining biomass levels⁴⁷.



With regard to fish caught in Portuguese waters (FAO 27.9) and in the rest of the North-East Atlantic area (FAO 27), horse mackerel (*Trachurus trachurus*) and bigeye tuna (*Thunnus obesus*) stocks are the most representative among the species listed as Vulnerable (29% and 7%, respectively). The biomass levels of all horse mackerel stocks in these regions are above the limit reference point, and they have full reproductive capacity⁴⁸. In respect of Atlantic bigeye tuna, stocks are currently overexploited but not overfished⁴⁹.

Only a small proportion of the species we sell caught in the Eastern Central Atlantic (FAO 34) and the Southeast Pacific (FAO 87), 22% and 11% respectively, are listed as Vulnerable. In both cases, the bigeye tuna (*Thunnus obesus*) was the most representative species. The stock of this species in the Eastern Central Atlantic is currently overexploited but not overfished⁵⁰, while the biomass levels of the stocks of the Southeast Pacific have been increasing due to the species conservation measures, so this stock is neither overexploited nor overfished⁵⁰.

Regarding FAO Area 27.3 (Skagerrak, Kattegat, Sound, Belt Sea, and Baltic Sea) and FAO Area 27.4 (North Sea), almost the entire quantity of fish sold is at listed as Least Concern (100% and 99%, respectively). In the case of the Southwest Atlantic regions (FAO 41), 17% of the species are Vulnerable, the bigeye tuna (*Thunnus obesus*) being the most represented species, the stock of which is overexploited but not overfished⁵⁰.

⁴⁶ Includes the Barents Sea (FAO Area 27.1), Norwegian Sea, Spitzbergen and Bear Island (FAO 27.2), the interconnected Skagerrak, Kattegat, Sound, Belt and Baltic Seas (FAO 27.3), North Sea (FAO 27.4) and Portuguese Waters (FAO 27.9) and other subareas.

⁴⁷ ICES. 2024. Cod (*Gadus morhua*) in subareas 1 and 2 north of 67°N (Norwegian Sea and Barents Sea), northern Norwegian coastal cod. In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, cod.27.1-2coastN.

⁴⁸ ICES. 2024. Horse mackerel (*Trachurus trachurus*) in Division 9.a (Atlantic Iberian waters). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, hom.27.9a. Available at: [ICES Report](#).

⁴⁹ ICCAT. 2024. Executive Summary of the 2024 Bigeye Tuna Stock Assessment. International Commission for the Conservation of Atlantic Tunas. Available at: [ICCAT Report](#).

⁵⁰ IATTC. 2024. Stock Assessment Report for Bigeye Tuna (*Thunnus obesus*) in the Eastern Pacific Ocean. Inter-American Tropical Tuna Commission. Available at: [IATTC Report](#).

Also noteworthy is the Pacific Northwest area (FAO 61), predominantly made up of species not evaluated by the IUCN (94%), such as the Asian hard clam (*Meretrix lyrata*).

Tuna, in particular Atlantic bigeye tuna, is one of the most relevant species in terms of conservation risk, mainly due to overfishing and the pressure on the stocks we source from. In 2024, we were able to trace 42% of our consumption of Private Brand tuna and perishables down to vessel level (our commitment is to guarantee full traceability by 2026). This commitment to traceability is essential to monitoring the fishing practices associated with this species, allowing us, where necessary, to define additional criteria to help reduce the likelihood of overfishing.

Animal welfare

[ESRS 2 MDR-A; ESRS 2 MDR-M]



We recognise animals as sentient beings and as such we work with our perishables and Private Brand suppliers and our production units to encourage them to follow practices aligned with the five freedoms of animal welfare: i) freedom from hunger and thirst; ii) freedom from discomfort; iii) freedom from pain, injury or disease; iv) freedom to express normal behaviour; and v) freedom from fear and distress.

Based on these principles, we have established operating guidelines for our production units and applicable to all animal species we market, which can also be implemented for our perishable and Private Brand products in the countries where we have operations. The main guidelines include:

- prohibiting the use of growth promoters (growth hormones and beta-agonists);
- only using antibiotics for therapeutic purposes, never preventively or to promote growth;
- mandatory stunning of all animals before slaughter, with the exception of certified religious rituals, such as halal or kosher (accounting for less than 5% of total sales).
- banning animal testing in the product development processes, except for animal feed products (sensory tests are performed to assess the level of satisfaction of a specific target population) and products for controlling or eliminating parasites and/or super-populations that might be sources of contamination or disease (e.g. insects).
- banning the use of genetically modified or transgenic additives or ingredients, including cloning techniques, whether plant- or animal-based.

Our Policy on Genetically Modified Organisms⁵¹ (GMOs) states that Companies must:

- cooperate with suppliers to understand the production processes and assess their safety and quality standards;
- regularly carry out laboratory analyses, using independent and accredited entities;
- ensure that suppliers can identify and trace GMOs in the cases where they cannot be replaced;
- guarantee the consumers' right to information about the presence of GMOs through product labelling⁵².

We conduct regular laboratory tests and food safety and quality audits, which include animal welfare criteria, of the suppliers and slaughterhouses used by our food distribution Companies in Portugal, Poland and Colombia to ensure compliance with these principles. Tests and audits are complemented by supplier training and awareness-raising initiatives. In 2024, the Group conducted over 2,060 GMO analyses in its Molecular Biology laboratory. For more information about these audits, see subchapter 4. "Social information", section 4.2 "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Actions towards our consumers", subpoint "Product analyses", of this chapter.

These topics are also discussed at the Sustainability Committee meetings of each Company, where action strategies are discussed and performance goals set. The results are made public to enable progress to be monitored on the implementation of continuous improvement opportunities. Although it was not identified as a material topic in our double materiality matrix, we are committed with specific objectives to continue improving our animal welfare practices in the 2024-2026 period. Our animal welfare goals are described in subchapter 6 "Sustainability commitments" of this chapter. In 2024, and for the first time, in Poland and

⁵¹ Part of our Product Quality and Safety Policy, available on our [website](#).

⁵² We ensure disclosure in strict compliance with the limit applied by the Group of a maximum of 0.1% (within the method's quantification limit). The limit allowed under European law is 0.9%.

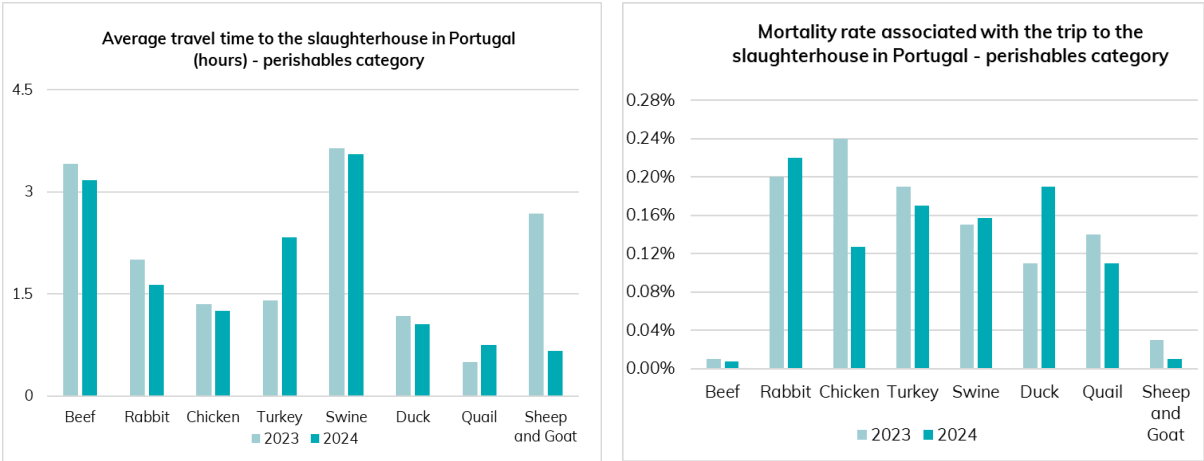
Portugal we conducted animal welfare audits of fresh aquaculture fish according to the "Fish Welfare" standard developed by Jerónimo Martins. We also achieved the goal of inspecting 100% of the fresh egg farms that supply the Biedronka Private Brand by the end of 2024.

For more information on these audits, the actions we develop with our suppliers and the outcomes achieved, see subchapter 5. "Governance information", section 5.2. "Business Conduct", section 5.2.1. "Selection and monitoring of suppliers", of this chapter.

Livestock transport and slaughter practices

In the countries where we have operations, we have implemented a monitoring system for perishables suppliers, focusing on indicators that allow us to assess animal welfare. For example, we portray animal transport conditions by monitoring the average duration of transport and the mortality rate during transport.

Portugal

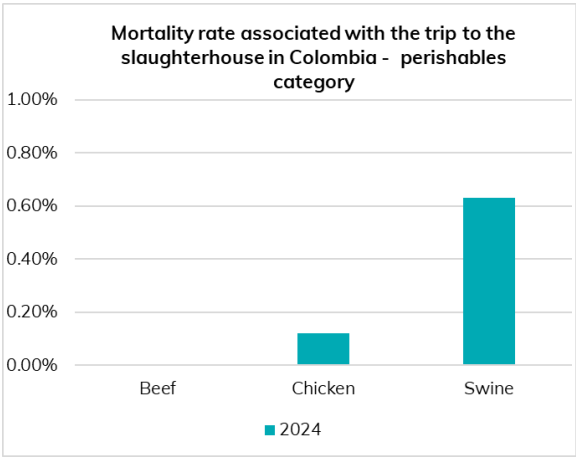
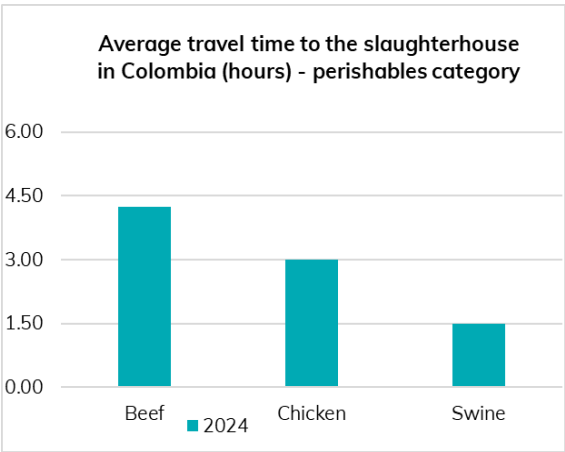


Taking into account the recommended maximum average journey time of 8 hours, in Portugal and since 2021 we have managed to keep journey time below this value and always below 4 hours.

The mortality rate has also remained below 0.25% in all animal species, suggesting that the animals are not subjected to excessive levels of discomfort, pain or suffering.

With regard to the practices of our perishable's suppliers in slaughterhouses in Portugal, 100% of animals were stunned before slaughter and approximately 99% of stunning was effective at the first attempt (0.2 p.p. more than in 2023).

Colombia



The year 2024 saw the first steps in our efforts to control and monitor key animal welfare indicators in Colombia. The average journey time for the three species we sell (beef, chicken and pork) was well below the recommended 8 hours (<4.5 hours).

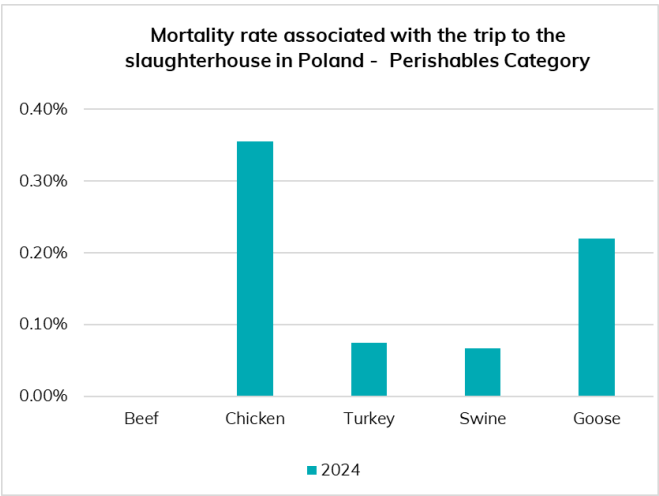
The mortality rate associated with transport is around 0.6% in pigs, less than 0.15% in chickens and does not exist in cattle. These results suggest that the animals were not subjected to excessive levels of discomfort, pain or suffering during transport.

Poland

In Poland, we also assessed these indicators with our most representative suppliers for the first time in 2024. With regard to the average journey time, we are unable to report this information as we identified inconsistencies in the data collection.

In 2025 we will improve our monitoring systems so that we can report this information next year.

The mortality rate was below 0.4% in all species.



Dairy, fresh egg and meat production practices

In our Private Brand and perishables assortment, we have integrated animal-based products and ingredients in line with responsible production practices and guided by ethical and animal welfare principles. We believe in the importance of information and awareness, and as such communicate with our customers through product labelling, in-store communication, commercial leaflets, Company websites and social media.

Beef

In 2024, Pingo Doce continued to market Private Brand Angus beef with double antibiotic-free production and animal welfare certification (obtained according to the international benchmark Welfare Quality and bearing the Welfair™ label), as well as organic beef. In the latter case, we also ensure compliance with

certification criteria such as access of animals to the outdoors, non-GMO feed, and grazing. Together, Angus beef and organic beef accounted for a 5% weight on sales in the perishable beef category.

Chicken

Biedronka continued to sell its range of 100% nationally produced free-range chickens (*Hubbard Redbro*), raised antibiotic-free and fed GMO-free feed. The minimum slaughter age is 70 days (14 days more than the market average) and the chickens have access to the outdoors with a density below 27.5kg/m², up to ten times more area than that of conventional chickens. Biedronka also continued to include 100% nationally produced antibiotic-free conventional chicken meat in its assortment.

At Pingo Doce and Recheio, free-range chickens are 100% produced in Portugal, have a minimum slaughter age of 81 days and are raised outdoors with a maximum density of up to 33 kg/m². Both Companies continued to include Best Farmer's Frango da Quinta chicken (*Hubbard Redbro*) in their assortment, which is mostly free-range and has an average slaughter age of 85 days. Production is certified antibiotic-free by AENOR and animal welfare certified according to the Welfair™ label (based on the international Welfare Quality benchmark). Thinning is not practised during production. Both free-range and Frango da Quinta chickens have access to the outdoors and natural light.

The sale of free-range chicken, animal welfare certified chicken and antibiotic-free chickens at Biedronka, Pingo Doce and Recheio have an 8% weight on sales in this category.

Dairy products

The Pingo Doce fresh milk range upheld the Welfair® label, which attests animal welfare certification according to the Welfare Quality protocol, issued by AENOR. The protocol is built on four basic principles: good feed, good shelter, good health and proper animal behaviour. This certification also assures that dairy cows are free from tethering and tail docking.

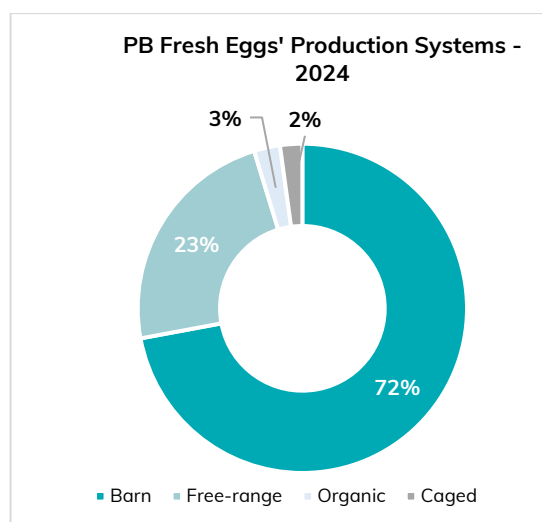
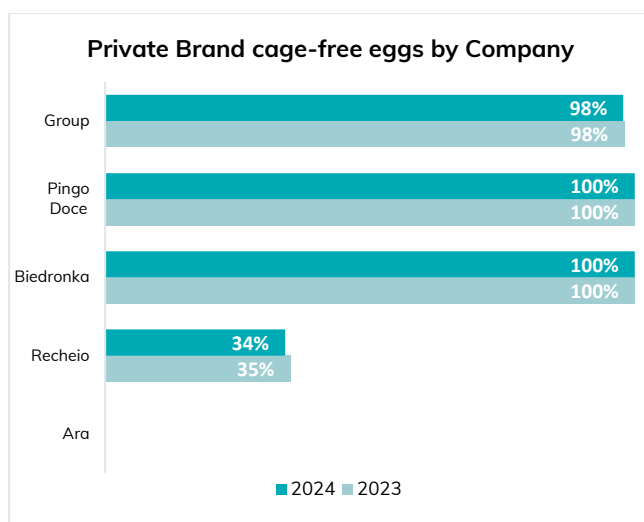
More than 95% of the producers who supply Terra Alegre's dairy farm have maintained this certification.

Cage-free eggs

We remain committed to ensuring that all Private Brand fresh eggs come from uncaged hens by 2025. To facilitate the transition to cage-free egg production, the Companies have worked closely with their suppliers, including the search for new production sites and ensuring visits by our food safety and quality teams to ensure compliance with the required criteria.

In 2024, we maintained the 98% of fresh Private Brand eggs from uncaged hens. Pingo Doce reached the 100% target in August 2019. Biedronka did so at the end of 2022, having also extended its commitment to supplier brands. Ara does not offer Private Brand fresh eggs in its assortment. In addition, Ara, Pingo Doce and Recheio offer these options in their assortment via supplier brand.

Three cage-free hen production systems are accepted: barn, free-range and organic. These systems establish animal welfare criteria that reflect a better quality of life for these animals, with greater freedom of movement and providing them a greater possibility of expressing their natural behaviours than caged hens. Free-range egg production is the most widely adopted system.



We are committed to ensuring that, by 2026, in Portugal and Poland, at least 90% of the eggs used as an ingredient in Private Brand products are from uncaged hens. At Biedronka, cage-free eggs have been used in 100% of the Private Brand assortment containing egg as an ingredient since 2022. Pingo Doce and Recheio continued to make progress in this regard, reaching 73% (12 p.p. more compared to 2023) and 41% (2 p.p. more compared to 2023) by the end 2024, respectively.

At Ara, and for the first time, we were able to monitor the Private Brand products that use eggs from uncaged hens as an ingredient, finding that cage-free eggs are used in 68% of the assortment.

Practices at Jerónimo Martins Agro-Alimentar (JMA)

JMA, which specialises in food production and supplies our distribution operations, has the following four business areas: dairy, livestock farming, aquaculture, and fruit and vegetables.

For more information about JMA, see chapter 2. "Performance of the business areas", subchapter 2.2.1. "Agri-food", of this report.

We follow standards that ensure animal welfare in the production of Aberdeen Angus beef. We provide an area of at least 6.5 m² per animal, grooved concrete or rubber flooring to reduce the risk of slipping and getting hurt, and fresh straw for bedding every day, ensuring their comfort and well-being.

JMA has also implemented other animal welfare practices for Angus cattle:

- at least one bed per cow;
- 60 cm of feeder space per cow;
- access to automatic massage brushes and ambient music (to reduce stress);
- access to pasture areas for all animals;
- automatic cooling systems that activate fans and sprinklers to cool the animals, each with their own monitoring collar for the early detection of pathologies through behavioural changes, thus contributing towards a reduction in the use of drugs.

At our dairy farms and Angus production units, we also ensure:

- the vaccination and de-worming of 100% of animals;
- that no animals are subject to mutilation (e.g. tail docking and dehorning) and that they all have free movement (they are free from chains);
- automatic cooling systems that activate fans for ventilation and to reduce the amount of ammonia in the air;
- mandatory training in animal welfare for all employees in contact with the animals;

- that no electronic shocks, sticks or any system that may hurt the animals are used when moving or handling them.

In sheep production we ensure a minimum area of 0.6 m² per animal, more than the recommended good practice of 0.5 m², and feed based on forage (source of fibre) and concentrate. None of the animals are castrated and they all have freedom of movement.

In 2024, the JMA maintained its certification in the responsible use of antibiotics in beef production and dairy farm, ensuring that antibiotics are used only for therapeutic purposes. The Welfair™ animal welfare approved certification of these units was also renewed, in accordance with the European Welfare Quality benchmark. Sheep production is also Welfair™ animal welfare certified, based on the AWIN® benchmark.

We continue to ensure that 100% of fish (sea bass and sea bream) in our aquaculture operations are vaccinated. Production in open sea areas with constant currents guarantees good circulation and water quality. None of the animals are subject to mutilation (e.g. fin clipping). During slaughter, we use ice-cold water to rapidly cool body temperature to desensitise the animals.

Support for biodiversity protection and ecosystem regeneration projects



[ESRS 2 MDR-A]

We support local biodiversity conservation projects in Portugal, Poland and Colombia, the three countries where we have our largest operations. In the development and selection of projects, we give preference to projects better aligned with the Kunming-Montreal Protocol. We also encourage collaboration with local associations and non-governmental organisations specialising in these areas, thus ensuring an appropriate level of knowledge and proximity to local communities. We also invest in education and awareness campaigns to raise awareness of the importance of healthy ecosystems and encourage the adoption of more sustainable practices.

In 2024, we invested over 327,000 euros to support 11 projects (7 in Portugal, 2 in Poland and 2 in Colombia) focused on restoring natural habitats, protecting biodiversity and raising environmental awareness. With regard to the initiatives featured in the table below, we also use the IBAT Alliance tool to assess proximity to protected areas, key biodiversity areas and the conservation risk of species that live near them (assessed in accordance with the IUCN). This assessment complements our monitoring of the progress of these projects.

Institution	Project	Description
Associação Floresta Serra do Açor	Reforestation of the Serra do Açor Mountain	Project launched in 2020 by the Jerónimo Martins Group, in partnership with the Arganil Town Council, the Coimbra School of Agriculture and the common landowners' associations, to preserve and enhance the landscape devastated by the forest fires of 2017. It involves the reforestation of an area spanning 2,500 hectares over a 40-year period. The project is implemented in the protected landscape area of the Serra do Açor mountain range and is close to the Lousã mountain range, a protected area part of the Natura 2000 network. Almost one million trees have been planted since the beginning of the project.
ANP - WWF	Green Heart of Cork	Started in 2011, developed and coordinated by ANP WWF and supported by the Group, this project promotes the conservation of Portuguese cork oak forests and payment for the environmental services they provide. This initiative establishes a platform linking companies to the conservation of cork oak forests and related ecosystem services. In 2024, the Jerónimo Martins Group contributed to the conservation of 803.47 hectares of high conservation value forests, promoting responsible forest management certification and the conservation of biodiversity and ecosystem services. The landowners involved in the project apply good forest management

Institution	Project	Description
		practices in approximately 45,000 hectares of FSC® certified areas, 30,000 hectares of which obtained certification after our support began.
Salamandra – Polish Society for Nature Conservation	Support for wild-insect pollinators	Project supporting wild-insect pollinators, created as a result of a partnership that began in 2021 between Biedronka and Salamandra (the Polish Society for Nature Conservation). The 2024 initiatives include (i) the "Biedronka with Salamandra for wild-insect pollinators in natural gardens" grant competition; (ii) education and the promotion of wild-insect pollinators and their protection through the publication of an issue of Salamandra Nature Magazine and communication actions on social media; and (iii) the start of work to create the Polish Red List of species.
Clean Poland Association (Stowarzyszenie Czysta Polska)	Clean Tatra Mountains	Project supported since 2019 by Biedronka to clean up the Tatra Mountains and led by the NGO Clean Poland Association. The 2024 edition was held under the slogan "Heads up!", during which an eco-town was set up for two days in Zakopane, where educational activities took place, some of them led by Biedronka. A total of 2,075 volunteers took part in the campaign, collecting 248 kg of waste on the mountain trails. The first 'Clean 5 run' was also held in Zakopane, with 200 trees planted, one per runner.
Fundabejaz	Protection of bees	Started in 2021, supported by Ara, for the protection and conservation of bees and raising awareness of their importance in ecosystems. During 2024, the Fundabejaz Foundation successfully: (i) rescued 50 hives; (ii) delivered 24 recovered hives to beekeepers and farmers; and (iii) carried out 91 awareness-raising campaigns involving 6,420 participants. Ara also donates sugar as a food source for rescued swarms.
Loros Foundation	Save the Macaws	Project started in Colombia in 2024 to protect macaws. It involves the rehabilitation and subsequent release of birds seized or voluntarily turned over by the environmental authorities to the Loros Foundation.

Commitments

[ESRS 2 MDR-T; ESRS E4-4]



The Group's commitments related to this topic can be found in subchapter 6. "Sustainability commitments", of this chapter.

3.2.5. Pollution

[ESRS 2 MDR-A; ESRS 2 MDR-M]



The impacts of pollution on our value chain are mainly associated with greenhouse gas emissions, the use of materials in own operations, such as packaging, and the food waste generated during our activities. Our actions to reduce pollution are described in subsections 3.2.1. "Climate change" and 3.2.2. "Resource use and circular economy" of this subchapter.

We recognise that there are other impacts, both in our own operations and in our supply chain, on water resources and biodiversity. Although these topics have been identified as non-material, information about our actions to mitigate these impacts is provided in subsections 3.2.3 "Water and marine resources" and 3.2.4. "Biodiversity and ecosystems" of this subchapter.

Internal environmental management standards have been established to reduce the environmental impacts of our operations. Compliance with these standards is monitored by conducting internal audits of our stores, warehouses, distribution centres and operating units. In 2024, we carried out over 9,000 environmental audits, 7% more than in 2023. The average score was 92%, 1 p.p. less compared to 2023. Corrective actions are defined for all cases in which the score does not reach 100%.

Internal environmental audits	2024	2023
Total (in figures)	9,016	8,364
Biedronka	7,259	6,860
Hebe	1	1
Pingo Doce	374	352
Recheio	43	41
Ara	1,339	1,110
JMA	21	10
Average performance (0-100%)	92%	93%
Biedronka	96%	96%
Hebe	96%	94%
Pingo Doce	82%	78%
Recheio	74%	73%
Ara	77%	81%
JMA	84%	80%

We are progressively increasing the number of sites with external environmental certification, such as ISO 14001, having set the goal of ensuring that at least 70% of the total number of distribution centres and industrial/similar units have environmental certification.

Environmental certification (ISO 14001)	2024		2023	
	Certified sites	Total sites	Certified sites	Total sites
Distribution centres (in figures)	25	35	23	34
Biedronka	17	17	17	17
Hebe	0	1	0	1
Pingo Doce	6	8	6	8
Recheio	0	0	0	0
Ara	2	9	0	8
JMA	0	0	0	0
Industrial units (in figures)*	5	6	5	6
Biedronka	1	1	1	1
Hebe	0	0	0	0
Pingo Doce	3	4	3	4
Recheio	0	0	0	0
Ara	0	0	0	0
JMA	1	1	1	1
Certified sites (%)	73%		70%	

* Fresh dough factory, central kitchens, soup factory, Terra Alegre dairy factory, and packaging units.

The environmental audits we carry out in the selection process of our perishables and Private Brand suppliers and to monitor them also help to reduce the potential impacts of pollution associated with their activities. The same is true regarding the sustainable agriculture project implemented with our fruit and vegetable suppliers, which assesses aspects such as soil fertility management, implemented fertilisation plans, and the use of phytopharmaceuticals. These initiatives are described in more detail in subchapter 5. "Governance information", section 5.2. "Business conduct", subsection 5.2.1. "Selection and monitoring of suppliers" and 5.5.2. "Supplier awareness and training", of this chapter.

We have identified opportunities to improve the efficiency of our activities with a positive impact on the reduction of other sources of pollution, such as the atmospheric emissions associated with our light vehicle fleet, the onsite use of fuel to operate equipment, and the use of emergency generators and heating.

Progress related to these sources of pollution is detailed in subchapter 7. "Reporting frameworks", section 7.2. "GRI-Global Reporting Initiative", of this chapter.

Commitments

[ESRS 2 MDR-T; ESRS E3-3]



The Group's commitments related to this topic can be found in subchapter 6. "Sustainability commitments", of this chapter.

3.3. Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

3.3.1. Framework

The [European Union Taxonomy](#) (EU) is one of the instruments supporting the [European Green Deal](#). It aims to encourage public and private investment to be allocated to sustainable activities, thereby contributing towards the European Commission's carbon-neutral targets by 2050. The Taxonomy recognises environmentally sustainable economic activities to be those that:

- make a substantial contribution to at least one of the six environmental objectives: i) climate change mitigation; ii) climate change adaptation; iii) the sustainable use and protection of water and marine resources; iv) the transition to a circular economy; v) pollution prevention and control and vi) the protection and restoration of biodiversity and ecosystems;
- do no significant harm to any of the other environmental objectives;
- meet minimum social safeguards.

Of the six defined environmental objectives, those relating to climate change mitigation and adaptation are regulated by the Climate Delegated Act and the Complementary Climate Delegated Act (the latter covering specific activities in the gas and nuclear energy industry). In 2023, new economic activities were introduced to achieve these two objectives. The remaining objectives are covered in the Environmental Delegated Act, also published in 2023. These documents list the eligible economic activities and technical criteria for assessing whether certain economic activities make a "substantial contribution" and at the same time "do no significant harm" to any of the other environmental objectives. Activities that comply with these criteria and those related to the minimum safeguards are considered to be taxonomy-aligned. This analysis, of eligible and aligned activities, must be carried out for three parameters: Turnover, CapEx and OpEx.

Since the European Taxonomy came into force, our main activity, food distribution, has not been included in the Taxonomy's list of activities, which is why no eligible – or aligned – activities were included in the turnover parameter. As such, only the activities supporting our operations are itemised as eligible and not necessarily the main activities that we carry out, which could make a greater contribution towards the EU's carbon-neutral targets.

3.3.2. Our contribution

Fighting climate change is one of the priorities defined in our [Environmental Policy](#). The commitments and actions we have taken and implemented in this regard are disclosed in our [Climate Transition Plan](#), available on our website, and in the subchapter 6. "Sustainability Commitments" of this chapter.

In 2024, our short- and long-term greenhouse gas (GHG) reduction targets were validated by the Science Based Targets Initiative (SBTi), making us the first food retail company with the head-office in Portugal to have its short-term and carbon neutrality targets recognised by the initiative. Our objectives are as follows:

Short term

- by 2023, reduce our scope 1 and 2 emissions (energy and manufacturing) by 55%, compared to 2021.
- by 2023, reduce our scope 3 emissions (energy and manufacturing) by 33%, compared to 2021.

- by 2033, reduce our forest, land and agriculture (FLAG) emissions by 39%, compared to 2021.

Carbon neutrality

- by 2045, reduce our scope 1 and 2 emissions (energy and manufacturing) by 90%, compared to 2021.
- by 2050, reduce our scope 3 emissions (energy and manufacturing) by 90%, compared to 2021.
- by 2050, reduce our forest, land and agriculture (FLAG) emissions by 72%, compared to 2021.
- by 2050, neutralise residual GHG emissions through projects that meet strict eligibility criteria, in line with international best practices.

These reduction targets ensure that we are aligned with the EU 2030 emissions reduction targets and with the science-based pathways for compliance with the Paris Agreement.

We have set ourselves the following intermediate targets to be achieved by 2026:

- reduce the Group's scope 1 and 2 emissions, in absolute terms, by at least 10%, compared to 2021.
- reduce carbon emissions from transporting goods to stores by 5% (in tonnes of CO₂e per pallet transported), compared to 2021.

By the end of 2024, we had reduced GHG emissions (scopes 1 and 2) by 19% compared to 2021, meeting and exceeding the target. With regard to carbon emissions associated with goods transport, in 2024 we reduced emissions by 6.1% compared to 2021, above the 5% target set.

The pursuit of our commitments is underpinned by continuous investment, with execution cycles aligned with the business plan, through which we promote the adoption of carbon-reduction technologies that will enable us to transition our activities to a low-carbon economy. The majority of this expenditure is allocated to the acquisition of goods and services from economic activities related to energy efficiency and renewable energy technologies. More detailed information is provided in subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", under the point "Our actions to reduce carbon emissions", of this chapter.

Although the Taxonomy does not yet include them as eligible activities – and as such does not define technical screening criteria for these technologies – reducing refrigerant leaks, particularly of high global warming potential (GWP), in our heating, ventilation, air conditioning and industrial cooling equipment are important to reduce our carbon footprint. In 2024, emissions from this type of equipment accounted for around 15% of our scope 1 and 2 emissions. Since 2015 that we have a Group-wide plan to replace high GWP refrigerants with natural refrigerants (e.g. carbon dioxide, ammonia or propane) or those with low GWP (e.g. R1234ze), as detailed in subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", under the point "Our actions to reduce carbon emissions", of this chapter.

Along with managing the refrigerants in such equipment, we implemented other energy efficiency measures that are not yet considered in the Climate Delegated Act, but which also make an important contribution towards achieving the European Commission's targets, namely:

- installation of equipment with improved energy performance (e.g. fridges and freezers with doors and lids that prevent energy loss);
- sale of products and packages with sustainability certification, which guarantees the implementation of good agricultural and production practices and/or those not linked to deforestation or the conversion of high conservation value ecosystems;
- the work we have carried out with our suppliers to promote sustainable agricultural practices and to eradicate deforestation in our supply chains⁵³.

⁵³ According to the [EU regulation on deforestation-free supply chains](#), it is estimated that deforestation is responsible for around 11% of total global carbon emissions and that around half of these are linked to agricultural production.

3.3.3. Eligibility analysis

We examined the eligible economic activities identified in the Climate Delegated Act, in the Complementary Climate Delegated Act and in the Environmental Delegated Act, and identified six eligible activities related to the acquisition of goods or services that support our main activity:

Activity	Code*	Description
Transport by motorbikes, passenger cars and light commercial vehicles.	CCM 6.5 CCA 6.5	This activity includes service vehicles under car leasing arrangements.
Renovation of existing buildings.	CCM 7.2 CCA 7.2 CE 3.2	We have made significant investments in the refurbishment of our stores (Portugal, Poland and Colombia). Only major refurbishment works are considered in this activity (as set out in the Portuguese national and regional regulation transposed from Implementing Directive 2010/31/EU for "major renovations").
Installation, maintenance and repair of energy efficiency equipment.	CCM 7.3 CCA 7.3	This activity includes measures such as envelope and roof insulation and replacement of windows, doors, light sources and HVAC (heating, ventilation and air conditioning) systems with more efficient technologies. There is other equipment that helps to improve the energy efficiency of our stores and operations that is not included in the Taxonomy but enables us to reduce our carbon footprint and increase our energy efficiency, namely chillers and standalone cooling equipment.
Installation, maintenance and repair of instruments and devices for measuring, regulating and monitoring the energy performance of buildings.	CCM 7.5 CCA 7.5	We have invested in the installation of energy management systems.
Installation, maintenance and repair of renewable energy technologies.	CCM 7.6 CCA 7.6	We have invested in installing photovoltaic solar energy equipment.
Acquisition and ownership of buildings.	CCM 7.7 CCA 7.7	This activity includes the acquisition of buildings, new leases/rentals of buildings (right-of-use) and refurbishments and other renovations of existing buildings not included in other activities. Refurbishments are outsourced to third parties in the civil engineering sector who carry out the building/refurbishment works. Jerónimo Martins only acquires the result of those services and does not carry out any actual construction. As such, considering (i) the similarity to the situations in which we acquire a building that has been built by third parties and (ii) the absence, at this stage, of another activity in the Taxonomy where they would be more suitably classified, we have considered it appropriate to classify these situations as exercising the right of ownership over the refurbished buildings.

*CCM (Climate Change Mitigation); CCA (Climate Change Adaptation); CE (Circular Economy).

The Climate Delegated Act determines eligibility and the alignment with climate change mitigation and adaptation objectives. The activities described above are also included in Annex II to the Climate Delegated Act regarding the objective of climate change adaptation. As the contribution to the climate change adaptation objective is of lesser importance compared to the mitigation objective, we opted to carry out the alignment analysis for the mitigation objective.

Some additional activities were identified as possibly fitting within the terms of eligible Capital Expenditure (CapEx). However, since they are carried out as part of the construction and refurbishment of our infrastructures, they are considered under activities 7.7 "Acquisition and ownership of buildings" and 7.2 "Renovation of existing buildings", respectively. These activities are:

- 5.1 "Construction, extension and operation of water collection, treatment and supply system".
- 5.2 "Renewal of water collection, treatment and supply systems".
- 5.3 "Construction, extension and operation of wastewater collection and treatment systems".
- 5.4 "Renewal of wastewater collection and treatment systems".

With regard to activities 5.5 "Collection and transport of non-hazardous waste in source-segregated fractions" and 6.6 "Freight transport services by road", as these are outsourced to third-party service providers who do not represent our assets, they were excluded from the calculation of the indicators. However, considering their relevance to our operations, they are an integral part of our strategy to reduce greenhouse gases, described in section 3.2.1. "Climate Change" of this chapter.

Activity 7.4 “Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)” is also outsourced to third-party service providers and has therefore been excluded from the calculation of the indicators.

We also examined Delegated Regulation (UE) 2022/1214, which adds a set of economic activities to the Climate Delegated Act in certain energy sectors (nuclear energy and fossil gas). We do not carry out, fund or have exposure in the construction, renewal or operation of such activities.

3.3.4. Alignment analysis

Substantial Contribution (SC) and Do No Significant Harm (DNSH)

Once the eligible activities had been identified, the technical criteria defined in the Delegated Acts were analysed to determine whether those activities:

- substantially contribute to each of the six environmental objectives defined in the Taxonomy;
- do no significant harm to any of the other environmental objectives;

This analysis was performed for the countries in which we have operations. It is important to highlight that for the majority of our investments in Colombia and Morocco, it is not possible to verify alignment since the criteria defined in the delegated acts are applicable only to European jurisdictions, and there is no guidance from the European Commission for the application of these criteria to non-European countries. We also found that the technical criteria defined for some activities (e.g. 7.7 “Acquisition and ownership of buildings”) may not be applicable to the weather conditions in some regions of those countries. The combination of these two factors prevents the assessment of a potential alignment of around 15% of the Group's CapEx.

Some of the criteria analysed for the six activities identified as eligible are highlighted below.

Activity 6.5. Transport by motorbikes, passenger cars and light-duty vehicles

Criteria	Description (non-exhaustive)	Alignment analysis
SC	Category M1 and N1 vehicles comply with the following requirements: <ul style="list-style-type: none"> • By 31 December 2025, specific CO₂ emissions of less than 50g CO₂/km (light-duty vehicles with zero or low emissions). • From 1 January 2026, specific CO₂ emissions are zero. 	In 2024, we contracted service vehicle leasing in Portugal, Poland and Colombia. For the vehicles where it was possible to collect all the necessary technical information, we assessed and validated their alignment with the technical criteria. For the cases where all the information relating to their characteristics could not be obtained, we chose to consider these investments as not being aligned.
DNSH	Climate change adaptation: <ul style="list-style-type: none"> • Appendix A. 	See Appendix A application analysis below.
DNSH	Transition to a circular economy: <ul style="list-style-type: none"> • Category M1 and N1 vehicles are both of the following: <ol style="list-style-type: none"> a) reusable or recyclable to a minimum of 85% by weight; b) reusable or recoverable to a minimum of 95% by weight; • Measures are in place to manage waste both in the use phase (maintenance) and the end-of-life of the fleet, including through reuse and recycling of batteries and components, in accordance with the waste hierarchy. 	Despite our commitments to promoting a circular economy and waste management, we were unable to collect the evidence needed to ensure that 85% (by weight) of vehicles are reused or recycled and 95% (by weight) are reusable or recovered. As such, we opted to adopt a conservative approach and acknowledge that we are not aligned with these DNSH criteria.
DNSH	Pollution prevention and control: <ul style="list-style-type: none"> • The vehicles comply with the requirements of the light-duty emission type-approval with regard to emissions (Euro VI standard); • The vehicles comply with the established emission thresholds for clean light-duty vehicles; • For road vehicles of categories M and N, tyres comply with external rolling noise requirements in the highest populated class and with the rolling resistance 	The data collected to check compliance with the requirements are still insufficient to guarantee their alignment.

Criteria	Description (non-exhaustive)	Alignment analysis
	coefficient influencing the vehicle energy efficiency in the highest two populated energy efficiency classes.	

Activity 7.2. Renovation of existing buildings

Criteria	Description (non-exhaustive)	Alignment analysis
SC	Complies with the applicable requirements for major renovations or leads to a reduction in PED (primary energy demand) – the calculated amount of energy needed to satisfy the energy demand associated with a building's typical consumption (in kWh/m ²) – by at least 30%.	In 2024, we carried out major renovations in some of our stores in Portugal, Poland and Colombia. These comply with the major renovations classification criteria in these countries.
DNSH	Climate change adaptation: • Appendix A.	See Appendix A application analysis below.
DNSH	The sustainable use and protection of water and marine resources: • Appendix E.	The data collected to check compliance with the requirements linked to Appendix E are still insufficient to guarantee their alignment.
DNSH	Transition to a circular economy: • At least 70% (by weight) of the non-hazardous construction and demolition waste generated on the construction site is prepared for reuse, recycling and other material recovery. • Building designs and construction techniques support circularity (ISO 20887).	Despite our commitments to promoting a circular economy and waste management, we were unable to collect the evidence needed to ensure that 70% of non-hazardous construction and demolition waste on the construction sites is prepared for reuse, recycling or other material recovery. As such, we opted to adopt a conservative approach and acknowledge that we are not aligned with these DNSH criteria.
DNSH	Pollution prevention and control: • Appendix C. • Building components and materials (paints and varnishes, ceiling tiles, floor coverings, including adhesives and sealants, internal insulation and interior surface treatments, particularly for treating damp and mould) that may come into contact with occupiers emit less than 0.06 mg of formaldehyde per m ³ of materials or components.	We regularly carry out indoor air quality assessments, namely for major retail and services buildings. In addition, during construction or maintenance works, we adopt appropriate measures to reduce noise, dust and pollutant emissions. However, the assessment carried out does not allow us to validate all the requirements set out in these criteria, namely those indicated in Appendix C. As such, we have chosen to consider that there is no alignment.

Activity 7.3. Installation, maintenance and repair of energy efficiency equipment

Criteria	Description (non-exhaustive)	Alignment analysis
SC	Complies with minimum requirements set for individual components and systems in the national measures and, where applicable, are rated in the highest two populated classes of energy efficiency in which a significant number of products are available.	It was not possible to obtain all the information regarding the technical characteristics, so we chose to consider these investments as not aligned.
DNSH	Climate change adaptation: • Appendix A.	See Appendix A application analysis below.
DNSH	Pollution prevention and control: • Appendix C. • In case of addition of thermal insulation to an existing building envelope, a building survey is carried out in accordance with national law.	In 2024, no investments were made related to thermal insulation.

Activity 7.5. Installation, maintenance and repair of instruments and devices for measuring, regulating and monitoring the energy performance of buildings

Criteria	Description (non-exhaustive)	Alignment analysis
SC	Consists of the installation, maintenance and repair of energy management systems.	In 2024, we invested in the installation of energy management systems in our buildings.
DNSH	Climate change adaptation: • Appendix A.	See Appendix A application analysis below.

Activity 7.6. Installation, maintenance and repair of renewable energy technologies

Criteria	Description (non-exhaustive)	Alignment analysis
SC	Consists of the installation, maintenance and repair of solar photovoltaic systems where they are installed on-site as technical building systems.	In 2024, we invested in the installation of photovoltaic solar equipment in our buildings.
DNSH	Climate change adaptation: • Appendix A.	See Appendix A application analysis below.

Activity 7.7. Acquisition and ownership of buildings

Criteria	Description (non-exhaustive)	Alignment analysis
SC	For buildings built after 31 December 2020, the buildings meet the SC of activity 7.1: <ul style="list-style-type: none"> Primary energy demand (PED) is at least 10% lower than the threshold set in the requirements for nearly zero-energy building (NZEB), the standard building concept used by EU countries as a value for minimum building requirements. For buildings built before 31 December 2020, the buildings have at least an Energy Performance Certificate (EPC) nor equivalent Class A or are within the top 15% of the national or regional building stock expressed as operational PED percentage, comparing the performance of the relevant asset with the performance of the national or regional building stock built before 31 December 2020.	For buildings built after 31 December 2020: <ul style="list-style-type: none"> In Portugal, within our exercise of ownership rights, we made investments in 2024 that comply with the SC requirements (validated by the existence of type A+, A and B energy certificates). In Poland, the criteria are certified using a methodology equivalent to the energy certificate, based on the energy performance of the stores. In Slovakia, we made investments in 2024 that fulfil the SC requirements (validated by the existence of energy certificates type A). In Colombia, we were unable to validate alignment due to the absence of guidance for transposing the technical criteria required by the applicable European Directives and Regulations. For buildings built before 31 December 2020: <ul style="list-style-type: none"> In Portugal, according to official databases, the top 15% of the national building stock built before 31 December 2020 have an EPC of B or higher, and so we have considered that the investments in buildings built before 2020 with an EPC of at least B, comply with the substantial contribution criterion; In Poland, according to the Polish Central Energy Performance Register, the value of the PED of the top 15% of non-residential buildings corresponds to 109.84 kWh (m²/year), and so we have considered that the investment in buildings built before 2020 with an EPC below that value, comply with the substantial contribution criterion; In Colombia, we were unable to validate alignment due to the absence of guidance for transposing the technical criteria required by the applicable European Directives and Regulations.
DNSH	Climate change adaptation: • Appendix A.	See Appendix A application analysis below.

Application of Appendix A “Climate change adaptation”

We adopted the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) in 2020, now integrated into the International Financial Reporting Standards (IFRS), in response to the increasing challenge that climate change poses to society and businesses and the complexity of assessing the associated financial risks and opportunities. In 2024, we began updating our assessment of climate-related risks and opportunities. The purpose of this assessment is to enhance supply chain resilience, reduce carbon emissions, and identify potential business opportunities in primary production and the use of low-carbon technologies.

Under this Appendix in particular, we assessed more than 6,000 establishments (stores, distribution centres, head office buildings, central kitchens and industrial units) in the six countries where we have operations (Poland, Portugal, Colombia, Morocco, Czechia and Slovakia), focusing on the most frequent physical risks in our operations and on boosting opportunities related to the energy transition and the use of natural or low GWP refrigerants.

The assumptions made in this assessment – namely the risks assessed, climate scenarios used and time horizons considered – as well as the main conclusions and measures to be adopted are described in subchapter 3. “Environmental information”, section 3.2. “Managing environmental topics”, subsection 3.2.1. “Climate Change”, under the point “Managing climate-related risks and opportunities”, of this chapter.

3.3.5. Minimum safeguards

The [EU Taxonomy](#) establishes Minimum Safeguards such as “alignment with the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises⁵⁴, the UN Guiding Principles on Business and Human Rights (UNGP), including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work, and the International Bill of Human Rights”.

To help undertakings assess their compliance with these requirements, in October 2022 the European Commission’s Platform on Sustainable Finance published the [Final Report on Minimum Safeguards](#), identifying four topics that companies must address: human rights, corruption, taxation and fair competition. The activities carried out by Jerónimo Martins to ensure compliance with these requirements are described below.

In order to comply with European due diligence recommendations, we have been implementing a set of measures in the Group’s Companies to prevent and mitigate the adverse impacts of our activity on the environment, and in respect of human and labour rights, and governance aspects. This process follows the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights:

Incorporate responsible business conduct into management policies and systems

(Step 1 OECD Guidelines | UNGP 16)

Human rights in own operations

The Jerónimo Martins Group respects human and workers’ rights, following the guidelines of the United Nations and the International Labour Organization, within the framework of the Universal Declaration of Human Rights, the Fundamental Conventions of the International Labour Organization and other applicable conventions, in addition to the local laws of the countries in which it operates.

Our action is guided by principles such as respect for the law and human rights, honesty, integrity, transparency, diversity and inclusion, corporate social responsibility and independence from political parties. We prevent discrimination in all its forms, with professional development and recognition based on merit and fairness, qualifications and equal opportunities. We promote a safe and healthy workplace, with zero tolerance for any type of harassment. We also promote respect for the privacy of employees, working hours and the right to rest, valuing a balanced organisation of time, and seek to follow best practices in health and safety at work for our approximately 140,000 employees. We also ensure freedom of association and collective bargaining⁵⁵. For more information on this point, see subchapter 4. “Social information”, section 4.2. “Managing social topics”, subsection 4.2.1 “Own workforce”, point “Ethics and compliance”, sub-point “Freedom of association and collective bargaining”, in this chapter.

We seek to prevent the risks of forced and child labour, in particular through mechanisms that prevent the hiring of persons under the legally permitted employment age and have implemented measures to ensure respect for the rights of indigenous peoples.

The aforementioned human rights topics are integrated into our [Code of Conduct](#), which addresses the principles that guide our relationships with all stakeholders and are implemented in all of the Group’s HR management policies, most notably Labour Fundamentals Guidelines, a description of which can be found in subchapter 4. “Social information”, section 4.1. “Our social-related policies”, of this chapter.

⁵⁴ The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, first adopted in 1976, have been continually updated to adapt to social challenges and the evolving context of international business.

⁵⁵ Only in Portugal (around 24.9% of the Group’s total workforce), since in Poland and Colombia there are no collective regulation instruments applicable to the Group’s Companies.

Human and labour rights in the supply chain

With regard to the supply chain, in addition to the rules set out in the Jerónimo Martins Code of Conduct, three guiding documents are of note: the Code of Conduct for Suppliers, the Sustainable Sourcing Policy and the Anti-Corruption Policy, all available in our [corporate website](#). Suppliers are selected based on criteria of quality, innovation, price, supply capacity, performance, trust, continuity and sustainability over time.

In relation to the Sustainable Sourcing Policy, the Group reserves the right to immediately and unilaterally cease business relations with suppliers whenever it becomes aware that these and/or their suppliers are engaged in the violation of human, children's and/or workers' rights and/or do not incorporate ethical and environmental concerns in their activities.

In global sourcing processes (purchase of products that serve Companies located in more than one country) supplier selection criteria include accepting the Sustainable Sourcing Policy, the Code of Conduct for Suppliers and the Anti-Corruption Policy, declaring that no forced and child labour is used in their operations, and guaranteeing that working hours are in line with the law and the rest days established therein. Other criteria include fair pay, promoting a safe work environment, providing, for example, fire-fighting and personal protective equipment, emergency exits and medical care for all employees, and openness, in the event of selection, to being subject to social audits and training in this regard.

Preventing and fighting corruption

We are committed to fighting all forms of corruption, whether directly or indirectly associated with the various links in our value chain, demanding transparency and integrity in relationships between different stakeholders, and implementing an integrity due diligence procedure to identify corruption risks posed by third parties in the value chain. In our Anti-Corruption Policy, which is an integral part of the Code of Conduct, we established the principle of zero tolerance for any behaviour involving corruption, influence peddling, receiving or offering undue advantages, or paying or receiving any benefits contrary to the laws in force in each country and Jerónimo Martins's Code of Conduct.

Jerónimo Martins is a member of the United Nations Global Compact, which, per its ten principles, protects human and workers' rights and establishes, in its [Principle 10](#), that "businesses should work against corruption in all its forms, including extortion and bribery". Jerónimo Martins Polska joined the Global Compact's Polish network in 2024, embodying yet another step forward in this commitment. We report progress made on these principles annually.

Fighting against corruption and bribery is also one of the Sustainable Development Goals ([Goal 16 – Peace, Justice and Strong Institutions](#)), and one of the United Nations Guiding Principles on [Business and Human Rights](#). It is also included in the OECD Guidelines for [Multinational Enterprises on Responsible Business Conduct](#).

The Group has a [Plan for the Prevention of Corruption Risks and Related Infractions](#) (PPRC) in place, following the approval in Portugal of the General Framework for the Prevention of Corruption approved by Decree-Law No. 109-E/2021 of 9 December 2021, which identifies and classifies the Company's main and potential corruption risks, considering the likelihood and impact of the risks identified. This plan also lists the prevention and mitigation measures for these types of risks. The annual report on PPRC implementation was published in 2024, which is available in our [corporate website](#).

Taxation and fair competition

Concerning taxation, the Holding's Fiscal Affairs Department, which works together with the Tax Departments of Jerónimo Martins Polska and Jerónimo Martins Colombia, advises all of the Group's Companies, ensuring compliance with the laws in force and the optimisation of the business units' management actions regarding tax. It also manages tax disputes and the Group's relationship with external consultants and lawyers, as well as with the tax authorities.

Identifying and assessing adverse impacts

(Step 2 OECD Guidelines | UNGPs 17 and 18)

In this regard, of note are the Risk Policy and the Risk Methodology, aimed at aligning the Group's goals and strategy with the structured and consistent assessment of the specific risks of each Company and the risks common to the Group. These tools also enable us to monitor the emerging risks that could affect the Group and/or its Companies.

The annual risk management process, which involves approximately 70 managers from the Companies and countries in which the Group has operations, aimed at ensuring the identification, monitoring, assessment and reporting of the risks to which Jerónimo Martins and its Companies are exposed, as well as the most relevant measures to mitigate them, is explained in more detail in points 52. through 55. of chapter 4. "Corporate Governance" of this report.

Quarterly reviews are also carried out to ensure alignment with critical areas for the business and active monitoring of any emerging risks that may be relevant to us.

Based on this assessment, internal audits are planned and carried out and the strategic plans of each Company are prepared. The topics considered throughout the risk assessments take into account aspects that could be associated with risks of corruption, reputation, affected communities and human rights.

Cease, prevent or mitigate adverse impacts and monitor the implementation and outcomes of the measures taken

(Step 3 OECD Guidelines | UNGPs 13, 17 and 19 and Step 4 | UNGPs 17 and 20)

Human Rights

We conduct audits both in our selection process of new perishables and Private Brand suppliers and regularly to monitor the management and control of production processes, in particular the implemented quality and food safety systems. These audits are conducted by internal teams, with the help of independent external auditors, covering aspects such as food safety and quality, environmental and labour-related aspects, among other criteria.

Social audits, in turn, carried out by an independent external entity, aim at monitoring and ensuring compliance with national and international law, and at encouraging the adoption of good practices shared by The Consumer Goods Forum's Sustainable Supply Chain Initiative. They also seek to ensure compliance with the Resolution and Priority Principles⁵⁶, in force since 2015, of the Human Rights Coalition – Working to End Forced Labour, also of the Consumer Goods Forum (CGF).

These social audits cover more than 120 assessment criteria, some of which considered to be of "zero tolerance" regarding aspects related to eradicating forced and child labour, emergency preparedness, health and safety and, among others, fighting corruption.

They are preceded by training and, after an on-site verification of infrastructures and interviews with workers, culminate in an overall score. A corrective action plan is created, where necessary, with a stipulated time limit for implementation based on the level of severity. Audits apply to three types of activities in the agri-food sector: primary production, at-sea operations and manufacturing.

For more information about the audits we carry out of our suppliers, see subchapter 5. "Governance information", section 5.2. "Business Conduct", subsection 5.2.1. "Selection and monitoring of suppliers", of this chapter.

⁵⁶ The CGF Priority Principles (available [here](#)) advocating for issues considered critical in the protection of labour rights in global supply chains: freedom of movement (the ability of workers to move freely should not be restricted by their employer through abuse, threats and practices such as retention of identification documents and valuable possessions); the voluntary nature of a job (no worker should pay for a job, should be aware of the terms and conditions of their work in advance, and should be paid regularly as agreed; contractual arrangements based on indebtedness or servitude are prohibited); and, contractual freedom (no worker should be indebted or coerced to work and fees or costs associated with recruitment and employment should be paid by the employer and not by placing any financial burden on a worker).

Alongside the initiatives carried out with our suppliers, we encourage them to implement a sustainability certification system. These systems follow benchmarks that take into account environmental and/or social requirements that are verified by external entities and can cover one or more ingredients, the product itself and/or its packaging. This certification ensures the implementation of good environmental practices in the value chain and assures that product manufacturing did not entail deforestation or conversion of high conservation value ecosystems, that the production processes are best in class to mitigate pollution, and/or that the principles of human rights are respected, confirming the absence of child or forced labour, fair payment to producers, among other aspects. Specific symbols on products and other forms of communication are also used at the point of sale to facilitate the communication of these attributes to consumers, encouraging them to make more informed choices.

Information about certified-sustainable products can be found in subchapter 4. "Social information", section 4.1. "Our social-related policies", subsection 4.1.3. "Consumers and end-users", of this chapter.

Internally, and as a means to prevent and mitigate the risk of labour rights violations in Portugal, we perform regular HR operations audits of working hours, rest and holiday periods, health assessments, working conditions and other criteria with which compliance and control are aimed at promoting the dignity of workplaces and the well-being of employees. Where nonconformities are identified, a correction plan is defined, with actions closely monitored by the HR team, and the subsequent audit is brought forward to confirm that the plan has been implemented. Ara's teams also monitor a criticality map that allows them to control priority labour rights indicators and trigger the audit of stores with an identified risk.

Preventing and fighting corruption

When onboarding employees, and to impart our values and ethical principles, they participate in in-person training on the Code of Conduct and we provide and formally request an acknowledge receipt of the Code of Conduct and the Anti-Corruption Policy, ensuring regular communication on these issues.

Moreover, we have implemented a training programme on the Anti-Corruption Policy, in two formats (e-learning and advanced training for critical functions), the content of which are periodically reviewed to ensure that it is up to date. In 2024, a total of 24,937 hours of training were provided on this topic (47.1% more than in 2023) and we reached 42,477 employees through communication campaigns. In addition to general training on the policy, at different levels of depth, training was given to specific target audiences such as the Human Resources and Quality and Food Safety teams on different topics related to corruption prevention, such as, for example, the Due Diligence Procedure. In Colombia, 6,151 employees received training in the self-control and risk management system for money laundering and terrorist financing, and training was given on the Transparency and Business Ethics Programme (PTEE), a Colombian legal regulation.

We also ensure communication with third-party entities that work with Group Companies. In this regard, of note is the dissemination of the Anti-Corruption Policy among suppliers, the Supplier Code of Conduct and Sustainable Sourcing Policy, published on the Group's website and/or included in contracts.

In addition, we periodically check the effectiveness of our internal policies, procedures and control mechanisms by means, for instance, of audits that include risk verification (including operational risks that may be associated with fraud and corruption) in order to identify possible nonconformities and opportunities for improvement. More detailed information is provided in chapter 4 "Corporate Governance", Part I "Information on Shareholder Structure, Organisation and Corporate Governance", section C "Internal Organisation", subsection III "Internal Control and Risk Management".

Taxation and fair competition

We take a collaborative approach with the tax authorities of the countries where the Group does business, participating, for instance, in various initiatives by the Portuguese Tax Authority on tax transparency and cooperative relationship.

The risk associated with tax and legal matters, as well as disputes with tax and competition authorities is constantly monitored by Management and by the Audit Committee.

Regarding fair competition, the Jerónimo Martins Group supports all efforts aimed at banning activities that restrict free trade, unfair practices or abuse of a negotiating position, and believes in strong and fair competition, scrupulously complying with the competition laws of the markets in which it operates.

Internal control and risk management systems

The Group's internal control system is ensured by a group of departments dedicated to monitoring critical processes at central and operational level, involving, namely:

- the Board of Directors;
- the Audit Committee;
- the Chief Executive Officer, assisted by the Managing Committee;
- the Risk Committee;
- the Internal Audit Department, which reports hierarchically to the Chairman of the Board of Directors and functionally to the Audit Committee;
- the Strategy and Risk Management Division;
- the Business Unit Risk Managers;
- all employees in charge of the execution and/or control of a given process or activity, within a business unit or the corporate structure, and who are responsible for managing the risks involved in those activities.

The Internal Audit Department assesses the quality and effectiveness of the internal control and risk management systems (operational and non-operational) determined by the Board of Directors, ensuring that they comply with the procedures and policies of the Group and its business units. This department's mission is also to promote compliance with the laws and regulations applicable to our operations. Internal control processes are formalised in policies and procedures, as described in chapter 4 "Corporate Governance", Part I "Information on Shareholder Structure, Organisation and Corporate Governance", section C "Internal Organisation", subsection III "Internal Control and Risk Management", point 50. "Individuals, Boards or Committees Responsible for the Internal Audit and/or Implementation of the Internal Control Systems" to point 55. "Core Details on the Internal Control and Risk Management Systems Implemented in the Company Regarding the Procedure for Reporting Financial Information".

Communicating how the impacts are being addressed

(Step 5 OECD Guidelines | UNGPs 17 and 21)

Details about our approach to the protection of human rights, the prevention of discrimination, the safeguarding of the right to collective bargaining, the prevention of forced and child labour, the prevention of corruption, as well as the management and mitigation of the associated risks, can be found in the Jerónimo Martins Group's policies and codes, available in this chapter, in subchapter 2. "General disclosures", section 2.6. "Our policies" and in subchapter 7. "Reporting frameworks", in the sections dedicated to the European Sustainability Reporting Standards (ESRS) and the Global Reporting Initiative (GRI), of this report:

- Management Approach: ESRS 1, ESRS 2, GRI 2-1 to 2-30, 3-1/2/3;
- Material Aspects: ESRS 2 BP-2, GRI 103-1/2/3;
- Anti-corruption: ESRS G1, ESRS G1-3, ESRS G1-4, GRI 205-1/2;
- Anti-competitive behaviour: ESRS 1, GRI 206-1;
- Employment: ESRS S1-1, S1-2, S1-4, S1-5, S1-17; ESRS S2-1, S2-2, S2-4, GRI 401-1/2/3;
- Labour and Management Relations: ESRS S1-1, S1-2, S1-4, S1-5, S1-17; ESRS S2-1, S2-2, S2-4, GRI 402-1;
- Occupational Health and Safety: ESRS S1-1, S1-2, S1-4, S1-5; ESRS S2-1, S2-2, S2-4, GRI 403-1/2/3/4/5/6/7/8/9/10;
- Training and Education: ESRS S1-1, S1-2, S1-4, S1-5, S1-17, GRI 404-1/2/3;
- Diversity and Equal Opportunity: ESRS S1-1, S1-2, S1-4, S1-5; ESRS S2-1, S2-2, S2-4, S2-5, GRI 405-1/2;
- Non-discrimination: ESRS S1-1, S1-2, S1-4, S1-5, ESRS S2-1, S2-2, S2-4, S2-5, ESRS S4-1, S4-2, S4-4, S4-5, GRI 406-1;
- Freedom of Association and Collective Bargaining: ESRS S1-1, S1-2, S1-4, S1-5, S1-17, ESRS S2-1, S2-2, S2-4, S2-5; GRI 407-1;
- Child Labour: ESRS S1-1, S1-2, S1-4, S1-5, S1-17, ESRS S2-1, S2-2, S2-4, S2-5, GRI 408-1;

- Forced Labour: ESRS S1-1, S1-2, S1-4, S1-5, S1-17, ESRS S2-1, S2-2, S2-4, S2-5, GRI 409-1;
- Security: ESRS S3-1, S3-2, S3-4, S3-5, GRI 410-1;
- Local Communities: ESRS S3-1, S3-2, S3-4, S3-5, GRI 413-1;
- Supplier Social Assessment: ESRS G1-2, GRI 414-1/2;
- Public Policy: GRI 415-1;
- Customer Health and Safety: ESRS S4-1, S4-2, S4-4, S4-5; GRI 416-1/2.

Remedial action or cooperation to remedy impacts when necessary

(6 OECD Guidelines | UNGPs 22, 29, 30 and 31)

Lastly, concerning enforcement mechanisms, the Ethics Committee is a specialised body tasked with impartially and independently monitoring the disclosure of and compliance with the Code of Conduct and the Anti-Corruption Policy of all the Group's Companies.

In accordance with the Whistleblowing Policy approved by the Company, the Ethics Committee provides a digital platform (available at www.jeronimomartins.com and at comissaodeetica.jeronimomartins.com) for the confidential reporting, anonymously if desired, of wrongdoing. For more information about the handling of complaints and resolution rate, see subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", of this chapter.

We also have four Ethics Offices in Portugal, two in Poland and one in Slovakia. These Ethics Offices are independent reporting channels which, together with the Ethics Committee, are responsible for ensuring the receipt and follow-up of reports of any wrongdoing related to the Companies, submitted by any concerned stakeholder. The Ethics Committee and Ethics Offices follow the principles of independence, impartiality, integrity, confidentiality and absence of conflicts of interest.

There are other bodies that receive and investigate reports about specific issues: the Anti-Mobbing, Anti-Discrimination and Sexual Harassment Committee, formed whenever there is a complaint involving these matters in Poland, and the Committee for Labour Co-existence in Colombia, which investigates reports relating to working conditions or other work-related issues.

Employees also have the Employee Assistance Service (SAC) available to them to report, ask questions about and resolve labour-related issues, and to receive and forward requests for social support. This channel ensures confidentiality, independence and impartiality, thereby safeguarding employees against any retaliation, discrimination and/or loss of rights.

We are currently tightening up our human rights' due diligence process in line with the OECD recommendations and EU law related to the Corporate Sustainability Due Diligence Directive, as well as on preventing and combating corruption, in compliance with the applicable legal framework.

3.3.6. Disclosure of KPIs (Key Performance Indicators)

In 2024, we recorded the following eligibility and alignment results:

- KPI turnover: 100% non-eligible, since our main activity (food distribution) is not currently regulated under the Climate Delegated Act.
- KPI Capital Expenditure (CapEx): 5% eligible and aligned; 56% eligible and non-aligned; 39% non-eligible.
- KPI Operational Expenditure (OpEx): 100% not eligible (potentially eligible numerator amounts are considered non-material).

According to Article 8 of the Delegated Act, undertakings are required to submit three tables, one for each of the KPIs, that is, turnover, capital expenditure (CapEx) and operational expenditure (OpEx). This information is set out below:

Turnover

Financial year 2024	2024		Substantial contribution (SC) criteria							DNSH ("Do no significant harm") criteria (h)									
Economic activities (1)	Code (a) (2)	Turnover (3)	Proportion of Turnover, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of taxonomy-aligned (A.1) or taxonomy-eligible Turnover (A.2), year 2022 (18)	Category — enabling activity (19)	Category — transitional activity (20)
		million €	%	Y; N; N/EL (b) and (c)	Y; N; N/EL (b) and (c)	Y; N; N/E L (b) and (c)	Y; N; N/E L (b) and (c)	Y; N; N/E L (b) and (c)	Y; N; N/E L (b) and (c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	C	W
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
Turnover from environmentally sustainable activities (taxonomy-aligned) (A.1.)	0	0%	0%	0%	0%	0%	0%	0%	0%								0%		
Of which enabling	0	0%	0%	0%	0%	0%	0%	0%	0%								0%	C	
Of which transitional	0	0%	0%														0%		W
A.2. Taxonomy-eligible but not environmentally sustainable activities (taxonomy-non-aligned activities) (g)																			
Turnover from taxonomy-eligible but not environmentally sustainable activities (taxonomy-non-aligned activities) (A.2.)	0	0%	0%	0%	0%	0%	0%	0%	0%								0%		
A. Turnover from taxonomy-eligible activities (A.1. + A.2.)	0	0%	0%	0%	0%	0%	0%	0%	0%								0%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover from taxonomy-non-eligible activities (B.)	33,464	100%																	
Total (A. + B.)	33,464	100%																	

The denominator of this KPI is based on consolidated turnover (sales and services), as indicated in the consolidated financial statements under chapter 3. "Consolidated Financial Statements". With regard to the numerator, no eligible activities were identified, since, and as previously indicated, food distribution is not currently included in the activities listed in the Taxonomy.

Capital Expenditure (CapEx)

Financial year 2024	2024			Substantial contribution criteria						DNSH ("Do no significant harm") criteria (h)									
Economic activities (1)	Code (a) (2)	CapEx (3)	Proportion of CapEx, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of taxonomy-aligned (A.1) or taxonomy-eligible CapEx (A.2), year 2022 (18)	Category — enabling activity (19)	Category — transitional activity (20)
		€ million	%	Y; N; N/EL (b) and (c)	Y; N; N/EL (b) and (c)	Y; N; N/EL (b) and (c)	Y; N; N/EL (b) and (c)	Y; N; N/EL (b) and (c)	Y; N; N/EL (b) and (c)	Y / N	Y/N	Y / N	Y / N	Y / N	Y / N	Y/N	%	C	W
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0	0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	C	
Installation, maintenance and repair of instruments and devices for measuring, regulating and monitoring the energy performance of buildings.	CCM 7.5	2	0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	0%	C	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	32	2%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	2%	C	
Acquisition and ownership of buildings	CCM 7.7	34	3%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%*		
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		67	5%	5%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	2%*		
Of which enabling		33	3%	3%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	2%	C	
Of which transitional		0	0%	0%						Y	Y	Y	Y	Y	Y	Y	0%		T
A.2. Taxonomy-eligible but not environmentally sustainable activities (taxonomy-non-aligned activities) (g)																			
Transport by motorbikes, passenger cars and light-duty vehicles	CCM 6.5 / CCA 6.5	17	1%	EL	EL	N/EL	N/EL	N/EL	N/EL								1%		
Renovation of existing buildings	CCM 7.2 / CCA 7.2 / CE 3.2	96	7%	EL	EL	N/EL	N/EL	EL	N/EL								10%**		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3 / CCA 7.3	93	7%	EL	EL	N/EL	N/EL	N/EL	N/EL								5%**		
Acquisition and ownership of buildings	CCM 7.7 / CCA 7.7	522	40%	EL	EL	N/EL	N/EL	N/EL	N/EL								40%		
CapEx of taxonomy-eligible but not environmentally sustainable activities (taxonomy-non-aligned activities) (A.2)		729	56%	56%	0%	0%	0%	0%	0%								56%		
A. CapEx of taxonomy-eligible activities (A.1+A.2)		796	61%	61%	0%	0%	0%	0%	0%								58%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of taxonomy-non-eligible activities (B)		503	39%																
Total (A + B)		1,299	100%																

* The 2023 values for activity 7.7 were restated for companies operating in Poland to reflect a more demanding classification for alignment, in line with that used in 2024.

** The 2023 values relating to renovation works in companies operating in Portugal were reclassified to activity 7.3.

According to the Article 8 of the Delegated Act, the CapEx KPI is defined as eligible CapEx (numerator) divided by total CapEx (denominator). Total CapEx was calculated in accordance with the rules and principles applicable to the preparation of the financial statements, taking into account the increases in the gross value of tangible fixed assets, intangible assets, investment property (where applicable), biological assets (where applicable) and right-of-use, as presented in notes 8, 9 and 10 to the Consolidated Financial Statements (subchapter 3.1. "Consolidated Financial Statements"). The denominator corresponds to the sum of the "Increases" headings referred to in the notes indicated.

Million euros

	2024	2023
Increases in Tangible Fixed Assets (Note 8.1)	933	1,111
Increases in Intangible Assets (Note 9.1)	16	22
Increases in Right-of-Use (Note 10.1)	350	291
Total 2024 CapEx for EU Taxonomy purposes	1,299	1,424

With regard to right-of-use assets, we believe that the Delegated Act fails to deal with increases in the gross value of right-of-use assets as a result of contractual amendments or other adjustments to lease liabilities, in particular extension of the lease term.

Accordingly, new measurements of right-of-use assets resulting from contractual amendments or other adjustments to liabilities were not included in the denominator, as presented under the heading "Amendments to Right-of-Use Contracts" in note 10.1.

Regarding the identification of eligible CapEx, our approach to the classification of economic activities was as follows:

- CapEx of assets or processes associated with eligible activities was not included, since our core activity is not provided for under the current Taxonomy, and no investments in internal activities were identified that qualify as such.
- CapEx related to CapEx plans, as currently defined in the Taxonomy, to expand aligned activities or that enable eligible activities to become taxonomy-aligned were not included.
- includes CapEx of the purchase of goods and services from eligible economic activities that support our core business.

As a result of this approach, the activities indicated under sub-section 3.3.3. "Eligibility analysis" of this subchapter were classified as eligible. As regards these activities, we analysed the investments for which we were provided with the necessary information by suppliers to identify whether their economic activity is taxonomy-aligned, including compliance with the DNSH criteria and minimum safeguards, as well as what we were able to assess directly.

Operational expenditure

Financial year 2024	2024			Substantial contribution criteria						DNSH ("Do no significant harm") criteria (h)									
Economic activities (1)	Code (a) (2)	OpEx (3)	Proportion of OpEx, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of taxonomy-aligned (A.1) or taxonomy-eligible OpEx (A.2), year 2022 (18)	Category — enabling activity (19)	Category — transitional activity (20)
		milli on €	%	Y; N; N/E L (b) and (c)	Y; N; N/E L (b) and (c)	Y; N; N/E L (b) and (c)	Y; N; N/E L (b) and (c)	Y; N; N/E L (b) and (c)	Y; N; N/EL (b) and (c)	Y/N	Y/N	Y/N	Y / N	Y / N	Y/N	Y/N	%	C	W
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (taxonomy-aligned)																			
OpEx related to environmentally sustainable activities (taxonomy-aligned) (A.1)	0	0%	0%	0%	0%	0%	0%	0%	0%								0%		
Of which enabling	0	0%	0%	0%	0%	0%	0%	0%	0%								0%	C	
Of which transitional	0	0%	0%	0%													0%		W
A.2. Taxonomy-eligible but not environmentally sustainable activities (taxonomy-non-aligned activities) (g)																			
OpEx of taxonomy-eligible but not environmentally sustainable activities (taxonomy-non-aligned activities) (A.2)	0	0%	0%	0%	0%	0%	0%	0%	0%							0%			
A. OpEx of taxonomy-eligible activities (A.1+A.2)	0	0%	0%	0%	0%	0%	0%	0%	0%							0%			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of taxonomy-non-eligible activities (B)	122	100%																	
Total (A + B)	122	100%																	

According to Article 8 of the Delegated Act, the OpEx KPI is defined as eligible and aligned OpEx (numerator) divided by total OpEx (denominator). Total OpEx for this purpose includes non-capitalised direct costs related to research and development, building renovation measures, short-term leases, maintenance and repairs, and any other direct expenditure related to the day-to-day servicing of assets of property, plant and equipment by the undertaking or third parties to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets. Operating costs related to the low-value lease of assets or contracts with variable lease payments are not included.

Also in accordance with the Delegated Act and considering the guidelines issued by the European Commission, an entity is exempt from calculating the OpEx KPI numerator where the denominator is considered non-material to the business model.

We are of the opinion that total OpEx, as shown in the table above, is not material to our activity, since it accounts only for 0.4% of total operational expenditure in 2024, given that we do not incur significant operational expenses for research and development under IAS 38, nor are the amounts incurred with asset maintenance and repair and short-term leases significant. As such, we have opted to avail ourselves of the foregoing exemption and not calculate the OpEx KPI numerator.

3.3.7. Fossil gas and nuclear energy related activities

With regard to nuclear energy and fossil gas related activities, the Group represents that it did not carry out such activities in 2024, as shown in the table below (Complementary Delegated Act: Model 1 - nuclear energy and fossil gas related activities):

Line	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
	Fossil gas related activities	
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

3.3.8. Conclusions and outlook of the 2025 report

In 2025, we will continue to monitor the publication of new delegated acts and the possible inclusion of new economic activities, as well as new guidelines for applying the Taxonomy that enable us to ensure compliance with European taxonomy-alignment reporting.

Moreover, we will continue to strengthen the assessment of technical criteria (SC and DNSH) for eligible activities where the values (e.g. CapEx) and the complexity of information gathering so warrant. These efforts involve engaging our suppliers, who we rely on for such information. In some cases, the necessary detail to claim alignment is not always available, e.g. in the product data sheets, making it difficult to collect and analyse information and provide evidence-based substantiation for such claims. Furthermore, given their small size, several of our suppliers also have trouble collecting and systematising this information in a way that can be considered taxonomy aligned. We will also continue to review the way in which information is classified and organised in the computer systems used by our Companies.

3.4. Sustainable Finance



3.4.1. Sustainable Finance Framework

We use sustainable finance instruments to speed up the implementation of our sustainability actions in order to achieve the goals we have set. Sustainable finance means ensuring that, together with purely financial indicators, good environmental, social and governance practices are taken into account in our investment decisions.

We know that our customers, suppliers, employees and investors pay close attention to what we do in light of all these criteria, and we believe that the use of sustainable finance plays a critical role in transforming the economy and society. Thus, in 2024 we published our "Sustainable Finance Framework", a document that serves as a framework for the Group's sustainable finance instruments. This document is in line with:

- The Green Loan Principles and the Sustainability-linked Loan Principles, published by the LMA - Loan Market Association (the authoritative voice of the syndicated loan market).
- The Green Bond Principles and the Sustainability-linked Bond Principles, published by ICMA - International Capital Market Association.

The aim of this document is to cover a wide range of financial instruments:

- Green loans or bonds, to finance concrete climate or environmental projects.
- Sustainability-linked loans or bonds, to finance the company's own activity on its sustainability path, and in relation to which the performance indicators chosen from the five set out in the document are monitored.
- Supply chain financing instruments, in this case indexed to the sustainability of the suppliers being financed.

Five indicators from the Corporate Responsibility topics focused on by the Group were included in the Sustainable Finance Framework, representing the topics identified in our double materiality matrix and the ambitious commitments made as part of our sustainability strategy. The Framework has been certified by EQA, an independent third-party organisation accredited for such purpose.

3.4.2. Instruments in progress

In 2023, Jerónimo Martins Polska (Biedronka) took out a Green Loan with the European Investment Bank (EIB) to finance the energy conversion of the entire Biedronka store network, increasing its energy efficiency and reducing carbon emissions and air pollution. The Company began using this facility, totalling 1.5 billion złoty (around 348 million euros) in 2024. In 2023 and 2024, Biedronka completed the refurbishment of more than 500 stores to improve their energy efficiency by implementing closed-loop cooling systems running on natural gases, thermal insulation of the buildings, and a building management system, in line with the European Performance Buildings Directive (EPBD).

In 2024, Jerónimo Martins Colombia (Ara) took out a Green Loan with the International Finance Corporation (IFC) for 120 million dollars (around 115 million euros) to finance the construction of two distribution centres with EDGE-advanced certification. The two distribution centres, which were still under construction in 2024, will ensure an energy savings of 25% and water savings of 60%. An estimated 40% reduction of GHG emissions is expected, compared to the benchmark. The alignment of the two buildings with the EDGE methodology includes the construction phase and, later, the operational phase of the buildings.

Under the Framework, a facility for issuing guarantees contracted by Jerónimo Martins, SGPS, S.A. was reclassified sustainability-linked. This facility, totalling around 350 million euros, will offer more favourable financing conditions indexed to the achievement of two indicators chosen by the financial institution from among the five provided for in the Framework.

Also in 2024, some of the supply chain financing facility, commonly referred to as "confirming" facilities, were converted and reclassified as "Confirming ESG". With these facilities, suppliers receive early payment from the bank of invoices issued to Jerónimo Martins Group Companies. The cost borne by suppliers to receive early payment of invoices will depend on their ESG rating, resulting from an assessment carried out by Ecovadis, or on the outcome of the ESG audits carried out by the Group of the supplier concerned. In other words, the cost to the supplier will be lower depending on how well it scores.

We closed 2024 with three categories of instruments in progress: green loans, supply chain finance agreements, and credit facilities for issuing guarantees. The nearly 1,115 million euros raised represent around 25% of the Group's total financial instruments. Our goal is to progressively increase the financial instruments under our Sustainable Finance Framework.

4. Social information

4.1. Our social-related policies⁵⁷

4.1.1. Own workforce

[ESRS S1-1; ESRS S1-4]



The Group is committed to ensuring high standards of integrity and ethics, endeavouring to promote the dignity, respect and protection of all those who work with us. To this end, we respect human rights, the regulation in force in the countries where we operate and applicable international legislation and guidelines, including the Universal Declaration of Human Rights, the Conventions of the International Labour Organisation and the Organisation for Economic Co-operation and Development (OECD) and the Guidelines for Multinational Enterprises, among others.

- In order to establish the standards of behaviour for all our structures, simultaneously acting as an ethical and deontological barometer by which employees must abide throughout their professional lifecycle in the Group, regardless of the hierarchical level in which they are, the function they perform or the country in which they work, we highlight the following policies: Code of Conduct
- Anti-Corruption Policy

To apply these principles in the regulations and processes of human resources management, we have global and local policies, of which we highlight the following:

- Labour Fundamentals Guidelines
- Guidelines for Preventing and Fighting Harassment and Discrimination
- Recruitment and Selection Policy
- Global Training Policy
- Performance Management Policy
- Health and Safety in the Workplace Policy
- Engagement Policy

The actions taken on material impacts, approaches to managing material risks and pursuing material opportunities and the effectiveness of these actions, related to our people, are described throughout the subsections of the section “Managing social topics”, including the resources allocated to the management of material topics.

4.1.2. Affected communities

[ESRS 2 MDR-P, ESRS S3-1]

[GRI 3-3, GRI 2-23]



The Jerónimo Martins Group is aware that, in the long term, a business's sustainability is an inseparable component of the extended responsibility with which it is run and its active contribution to the well-being of the surrounding communities in the areas in which it has operations. The guidelines that shape how we manage the Group's relationships with the communities affected by our activity, particularly with regard to the direct and indirect impacts of our operations, are reflected in our policies and codes:

- Policy of Support for Surrounding Communities
- Code of Conduct
- Sustainable Sourcing Policy
- Code of Conduct for Suppliers
- Whistleblowing Policy

As for the Policy of Support for Surrounding Communities, although the application of this policy is a guideline, some Companies adapt it according to the specificities of their business and the countries in which they operate.

⁵⁷ A description of these policies can be found in subchapter 2. “General disclosures”, section 2.6. “Our policies”. These are also available on our [website](#).

Regarding the procedures and service instructions for providing this support to the community, food donations comply with specific procedures aimed at preventing food waste, including the appointment of people responsible for processing the products and delivering them to the institutions. Both Biedronka and Pingo Doce have processes in place to collect food in stores for the charities they support. Biedronka also has a procedure for awarding donations which includes information on the types of eligible donations and sponsorships, the required documentation, those responsible for organising the donation process, data reports, and a social impact assessment.

Pingo Doce prioritises its work with local communities of which it is a part to address social emergencies, food shortages, and isolation and loneliness among older adults, and the promotion of children's literature.

In Colombia, Ara has defined collaboration against food insecurity, especially among children, as an absolute priority, working with various institutions and social organisations to combat malnutrition, to promote healthy habits and lifestyles, care for children and support mothers, families and communities. The Company has also developed specific donation procedures to reduce food waste, not only through direct donations to non-profit organisations, but also by supporting the implementation of a digital platform that connects companies wishing to donate surpluses to food banks and community support institutions.

Hebe, which specialises in health and beauty products and services, carries out initiatives in the surrounding communities targeting specific audiences, from vulnerable groups, such as young people ageing out of foster care and entering adulthood, women who want to build their own online business or young people with disabilities who dream of singing professionally.

The Code of Conduct establishes support for surrounding communities as a fundamental pillar of the Companies' operations, implementing it in accordance with nationally and internationally recognised guidelines for good governance, including the quality, transparency and ethical standards of our actions.

The Sustainable Sourcing Policy refers to the importance of stimulating socio-economic development in the regions where we have operations and making a positive contribution to the sustainability of the ecosystems and populations on which we directly or indirectly depend. With these objectives in mind, various principles of action are outlined to identify, assess, manage and/or remedy the impacts on affected communities.

The Code of Conduct for Suppliers establishes the ethical values and behaviours that suppliers must share with us, and which may also have an impact on the communities surrounding their area of operation. Our purpose is to identify, assess, manage and/or remedy the indirect impacts that our Companies have on their surrounding communities, by setting behavioural expectations for our suppliers in this regard⁵⁸.

4.1.3. Consumers and end-users

[ESRS 2 MDR-P, ESRS S4-1]

[GRI 3-3, GRI 2-23]



At Jerónimo Martins, investing in the responsible growth of our businesses means placing consumers at the very core of everything we do, whilst building upon the relationships we establish with upstream suppliers and producers. That is why our main Group policies incorporate consumer concerns, needs and expectations, which are in line with our goal of making high quality, safe, innovative and affordable products accessible to everyone. We also uphold our responsibility to promote positive societal behaviours, in face of recognising the fast-paced consumer trends, strong competition in retail and socioeconomic challenges for households.

Respecting consumer and human rights in each of the countries where we operate is paramount to fulfil our strategy, respecting the law and achieving the goal of carrying out our activities with total respect and social legitimacy. The following policies are particularly relevant for our consumers:

⁵⁸ These expectations can be found in subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", in subchapter 4. "Social information", section 4.2. "Managing social topics", subsections 4.2.3. "Consumers and end-users" and 4.2.4. "Workers in the value chain", and subchapter 5. "Governance information" in this chapter.

- Code of Conduct
- Code of Conduct for Suppliers
- Product Quality and Safety Policy
- Nutritional Policy
- Sustainable Sourcing Policy

In addition to our policies, we have internal strategic guidelines that serve as the implementation compass to our brands and Companies. The Guidelines for the Development of Private Brand Products and Perishables ensure standards' application (and their continuous adaptation to emerging knowledge) for both our teams and business partners.

These guidelines specify quality and food safety requirements for stores and distribution centres, restrictions on the use of food colouring, preservatives and other artificial additives, defining the recommended quantities of ingredients such as salt, sugar and fats, including other principles of nutritional labelling.

4.1.4. Workers in the value chain

[ESRS 2 MDR-P; ESRS S2-1]



We uphold and respect human and labour rights throughout the value chain and, together with our suppliers, seek to mitigate potential risks and encourage the sharing of good social practices.

Specifically in respect of the workers in our value chain, we are guided by a set of policies and requirements related to managing the risks and material impacts on people's well-being, in particular:

- Sustainable Sourcing Policy
- Code of Conduct for Suppliers

Although this is not a material topic, we provide in the next section of the report further details on how we manage the risks and opportunities related to workers in the value chain.

4.2. Managing social topics

4.2.1. Own workforce

[ESRS 2 SBM-3]

The year 2024 presented significant challenges for the Group's human resources strategy, the first being the continuation of an unstable geopolitical context and the macroeconomic situation marked by deflation in the food sector. Another key challenge to sustainable people management in the Group remains the competition for talent in a scarce job market (especially at store level), mainly considering low unemployment level, as well as the low attractiveness and difficulty in retention that arises from the demanding nature of our business. To respond to this challenge and maintain our competitiveness in the labour market, we continued to increase salaries for operational teams, which was reflected in an increase in labour costs.

The urgency of responding to new ways of working and the constantly changing expectations of candidates and employees, along with the growing need for new skills, profiles and roles that ensure the organisation's competitiveness and that respond to business opportunities and team productivity (generated, for example, by the emergence of new technologies) are some of the other identified challenges.

These and other challenges at local HR management level are assessed annually and monitored each quarter by the Risk Committee, to anticipate the potential negative impacts of the current context, in response to the five concerns that underpin our people management strategy:

- How to mitigate talent shortages in a sector with low attractiveness?
- How to ensure a sustainable leadership pipeline, and the right roles to respond to the challenges of each moment?
- How to have the right workforce configuration and the necessary skills to grow the business?

- How to ensure our workforce engagement?
- How to anticipate future organisational challenges, in terms of external obligations and new ways of working?

Our response to these concerns is embodied by the commitments we make every three years, monitored quarterly Group-wide and in each Company, for each of the priorities within sustainable people management, described in subchapter 6. “Sustainability commitments”, of this chapter.

We also identify opportunities to continue to generate a positive and lasting impact on the lives of our employees and their families, namely through our investment in internal social responsibility, wellbeing and development, among other areas of activity.

As a result of the work carried out, in 2024 Humpact⁵⁹ considered us one of the companies with the best social performance among the 46 assessed in the consumer goods sector, giving us the maximum score for the way we contribute to the United Nations Sustainable Development Goals. We were also distinguished in the Wellbeing Awards⁶⁰, in the “People Choice Awards” category, reflecting our employees’ positive perception, and by the Dream Employer Hub⁶¹, which awarded Biedronka the Dream Employer 2024 award.

Our employees

[ESRS 2 SBM-1; ESRS S1-6]



Total number of employees and by country

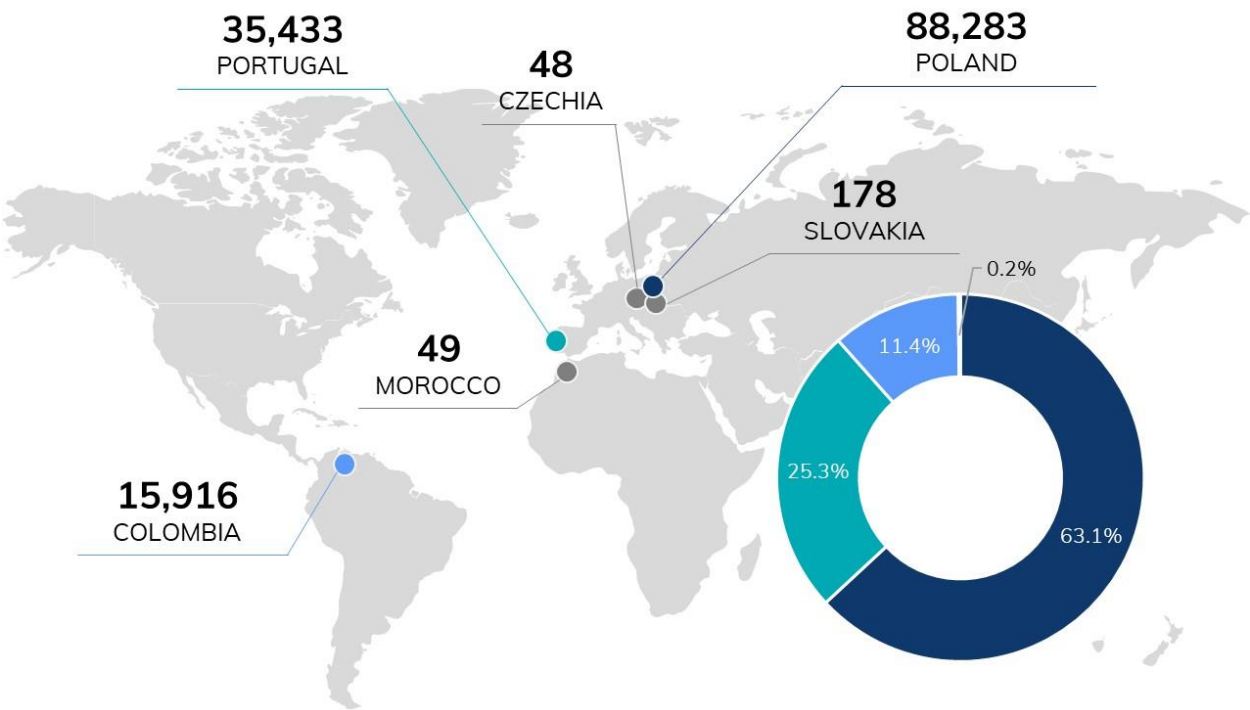
At the end of 2024, we had 139,858⁶² employees in our workforce in Portugal, Poland, Colombia, Slovakia and Czechia. Information on the Group's number of employees can also be found in chapter 1 “The Jerónimo Martins Group”, subchapter 1.2. “Financial and operational indicators”.

⁵⁹ Sustainability analyst focused on the social dimension.

⁶⁰ Organised by [Workwell](#) and AGIS, the Wellbeing Awards distinguish companies that excel in promoting well-being, health and happiness in the workplace.

⁶¹ DreamEmployer is a competition promoted by the [Dream Employer Hub](#) which distinguishes companies that implement innovative and effective practices in people management and organisational culture.

⁶² Includes the employees of all the Companies controlled by Jerónimo Martins, with some Companies employing people in more than one country. For the purposes of reporting the indicators included in this section 4.2. “Managing social topics”, subsection 4.2.1. “Own workforce”, the 49 employees of the Morocco operation were excluded, as it was considered not to be material enough to be reported from the point of view of managing material topics. Considering employees from the Moroccan operation, the Group's total headcount on 31/Dec/2024 was 139,907. The scope reported in the 2023 Annual Report was considered for purposes of comparison with the same period of the previous year, that is, employees from the operations in Portugal, Poland and Colombia.



Employees by gender and country
[GRI 405-1]

Group	Gender		Total
	Women	Men	
Group	106,326	33,532	139,858
Portugal	22,729	12,704	35,433
Poland	75,235	13,048	88,283
Colombia	8,211	7,705	15,916
Slovakia	104	74	178
Czechia	47	1	48

GLOBAL



87 NATIONALITIES

- The most common foreign nationalities in the three most representative countries are:
- Brazilian in Portugal
 - Ukrainian in Poland
 - Venezuelan in Colombia

Type of contract and working hours

[GRI 2-7]

	Type of contract*					
	Permanent (open-ended)			Temporary (fixed-term**)		
	Women	Men	Total	Women	Men	Total
Group	77,789	26,456	104,245	28,537	7,076	35,613
Portugal	19,303	10,060	29,363	3,426	2,644	6,070
Poland	50,678	8,794	59,472	24,557	4,254	28,811
Colombia	7,712	7,529	15,241	499	176	675
Slovakia	85	73	128	19	1	20
Czechia	11	0	11	36	1	37

* There are no employees in the Group with non-guaranteed hours. The total number of employees at the end of the period was used to calculate this indicator.

** The SENA (Servicio Nacional de Aprendizaje) internships in Colombia were included under the "fixed-term" type of contract, corresponding to 675 contracts.

	Type of work schedule					
	Full-Time			Part-time		
	Women	Men	Total	Women	Men	Total
Group	88,671	30,756	119,427	17,655	2,776	20,431
Portugal	19,051	11,148	30,199	3,678	1,556	5,234
Poland	61,363	11,894	73,257	13,872	1,154	15,026
Colombia	8,106	7,639	15,745	105	66	171
Slovakia	104	74	178	0	0	0
Czechia	47	1	48	0	0	0

Permanent contracts account for 74.5% of the Group's contracts, having increased 1.6 p.p. compared to the previous year, portraying our ongoing effort to promote stable employment relationships. In terms of working hours, full-time contracts represent 85.4% of the total, with this type of contract remaining prevalent.

Employee turnover, hires, retention and seniority

[GRI 401-1]

28.7% Employee turnover *	32.7% Hires' rate **	81.4% 12-month retention rate ***	6 years Average seniority
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* Ratio between employee exits during 2024 and the total number of employees at the end of the period.

** Ratio of employee hires during 2024 and the total number of employees at the end of the period.

*** Percentage of employees who were still with the Group in December 2024, based on December 2023.

We hired 45,667 people in 2024, creating 5,558 new jobs. We are increasingly providing young people with job opportunities, with the age group below 30 years old having the highest representation in hiring (53.0%).

There were 40,136 contract terminations and the turnover rate was 28.7%, a reduction of 1.6 p.p. compared to the rate of 30.3% recorded in 2023. In line with what is observed in the global retail sector, the highest turnover is concentrated in store and distribution centre operator roles and is more evident in younger age groups. Regarding the type of contract terminations, 58.6% were voluntary (initiated by the employee) and 41.4% were non-voluntary (initiated by the Companies, mainly due to the inherent seasonality of the business, requiring an adjustment of the workforce at times such as Christmas, Easter or over the summer.

Workers who are not employees

[ESRS S1-7]

[GRI 2-8]



At the end of 2024, there were 21,661 workers who are not employees recorded in our internal systems, accounting for 13.4% of the Group's total workforce. In most cases, these workers are hired through temporary employment agencies to perform roles such as store and logistics operators.

Workers who are not employees*	
Group	21,661
Portugal	336
Poland	17,320
Colombia	4,005

* The number of workers who are not employees in the global office functions and operations in Portugal corresponds to the headcount recorded in the human resources management system on 31/Dec/2024. In Poland, the number of workers who are not employees in Biedronka stores corresponds to the headcount recorded in a local management system on 31/Dec/2024. In the distribution centres and Hebe stores, the accounting of workers who are not employees corresponds to the number of full-time equivalent (FTEs) on 31/Dec/2024, estimated from the hours worked report provided by the service provider. In Colombia, the number of workers who are not employees in Ara's operations corresponds to the headcount recorded in internal manual systems on 31/Dec/2024.

Diversity and inclusion

[ESRS S1-1; ESRS S1-9]

[GRI 405-1]



As an international retailer with operations in different countries and a variety of businesses and roles, diversity is an essential part of who we are. We value the unique characteristics and capabilities of each employee, as we believe that the sum of individual differences strengthens teams, increases the capacity to innovate, and contributes towards being an employer that is representative of the communities of which we are a part.

	Age group			Gender				Total
	< 30	30-50	>50	Women		Men		
				#	%	#	%	
Group	36,569	86,283	17,006	106,326	76.0%	33,532	24.0%	139,858
Portugal	9,551	19,185	6,697	22,729	64.1%	12,704	35.9%	35,433
Poland	19,311	58,720	10,252	75,235	85.2%	13,048	14.8%	88,283
Colombia	7,636	8,236	44	8,211	51.6%	7,705	48.4%	15,916
Slovakia	46	123	9	104	58.4%	74	41.6%	178
Czechia	25	19	4	47	97.9%	1	2.1%	48
Functional levels								
Strategic	2	116	83	62	30.8%	139	69.2%	201
Managerial	251	2,884	420	1,879	52.9%	1,676	47.1%	3,555
Operational	36,316	83,283	16,503	104,385	76.7%	31,717	23.3%	136,102

In 2024 we had 139,858 employees, of which 7.5% (1.3 p.p. more than in 2023) were of foreign nationality relative to the five main countries of operation. We have employees of 87 nationalities, spanning four different generations, making us a diverse, multicultural and multigenerational employer.

Because we aim to preserve these qualities, our HR management policies guide conscious behaviours aligned with the Code of Conduct, ensuring the practice and promotion of ethical standards based on fairness, non-discrimination and equal opportunities, regardless of origin, gender, sexual orientation, religion, age, marital status, family situation, nationality, ethnicity, disability, political or ideological beliefs, trade union membership or any other criteria at all levels of the organisation and for all employees. We have also established monitoring routines that allow us to validate and ensure compliance and consistency with these policies.

An example of this is a project developed by Biedronka in 2024 that included an assessment of HR practices and training given to the teams responsible for these processes, aimed at raising awareness of the issue of diversity and inclusion and topics such as unconscious bias. Also in 2024, the Company signed in Poland the [Diversity Charter](#), coordinated by Forum Odpowiedzialnego Biznesu (the [Responsible Business Forum](#)), reinforcing its commitment to non-discrimination and policies that continue to promote diversity and inclusion.

As a result of the work that we have carried out in this area, the *Financial Times* and the online platform Statista acknowledged the Jerónimo Martins Group as a Leader in Diversity for the second consecutive year.

We were also distinguished as one of the 100 companies worldwide with the best diversity and inclusion practices by the [FTSE Diversity & Inclusion Index](#), organised by FTSE Russel. Among the more than 15,500 companies analysed worldwide, we rank 46th and are the only company based in Portugal, as well as the only one in the “supermarkets and convenience stores” sector present in the index.

Gender equality

Our commitment to gender equality is reflected in policies and initiatives to ensure balanced and equitable work environments, in which the opportunities given to men and women are based, above all, on merit.

We seek to ensure gender balance at all organisational levels and in all people management processes, and the pay parity that we have achieved in the main countries in which we operate demonstrates the importance we place on these matters.

Our workforce is predominantly made up of women (76.0%), similar to what is observed in the food distribution sector, and this is also true in leadership and management positions. In 2024, 69.1% of management positions and 51.7% of leadership positions (Managerial and Strategic functional levels) were held by women, and 40% of the members of the Group's Managing Committee were women.

Representativeness and employee life cycle	2024	2023	2022
Management positions held by women*	69.1%	67.4%	66.9%
Entry-level positions held by women**	76.7%	77.0%	78.8%
Revenue-generating functions carried out by women ***	75.4%	73.1%	72.6%
Hires taken by women	69.2%	68.1%	66.9%
Promotions given to women	68.2%	73.6%	78.2%
Terminations taken by women	68.0%	67.6%	67.0%

* Considering women who are part of the Strategic and Managerial functional levels, as well as women in the Operational functional level who manage teams (n=7.789).

** Roles that do not require previous experience in the field or profession and that are performed by women.

*** Roles responsible for central business objectives, profits or losses, and which are performed by women.

[ESRS S-16]

[GRI 405-2]

Gender pay ratio by country and most representative Company in each country*	2024	2023	2022
Group	98.5%	98.5%	97.8%
Portugal	99.5%	100.2%	100.1%
Pingo Doce	99.9%		
Poland	98.1%	97.9%	96.5%
Biedronka	98.1%		
Colombia	98.7%	98.0%	99.7%
Ara	98.7%		

* Salary difference between women and men within the universe of Jerónimo Martins employees, based on comparable realities. It is expressed considering women's average salary as a percentage of men's average salary, where 100% is the pay ratio that represents full pay equity. The calculation of this indicator is aligned with the ESRS methodology, with partial ratios being reported by Company and country, considering the heterogeneity between them. The methodology was changed in 2024, considering the new structure of functional levels fully implemented in the

different countries in which we operate. In Slovakia and Czechia, countries in which we recently started operating, we do not have a sufficiently robust sample to be able to include this in the calculation of the indicator and present the respective results. Additionally, the ratios of the most representative Company in each country are reported. As more than 97.3% of employees belong to the Operational functional level, the results of the gender pay ratio are mostly illustrative of this segment, so we do not consider partial reporting based on this variable to be relevant.

Our strategy is defined in the [Plan for Equality between Women and Men](#), the progress on which is reported and reviewed annually, and is supported by a set of internal and external assessment tools. Describing an action plan with seven dimensions and fourteen measures aligned with the guidelines of the Commission for Equality in Work and Employment (CITE), a Portuguese entity under the oversight and guidance of the Ministries of Parliamentary Affairs and Labour, Solidarity and Social Security, the Plan aims to guide us in implementing four pillars of action:

- **Formalising equality between women and men in policies and procedures** through guidelines that enshrine our commitment to human rights and the prevention of discrimination based on any diversity factor, including gender.
- **Monitoring gender indicators**, analysing internal practices and indicators on a quarterly basis throughout the employee's life cycle, in order to understand the main challenges and act on them, as well as monitoring the investors, analysts and main sustainability indices that assess our performance in this area.
- **Facilitating the integration of professional, personal and family life** with measures to support parenting, family wellbeing, situations of vulnerability and/or social emergency, as well as support for communities.
- **Raising of awareness and capacity-building for equality between women and men within and outside the Group**, sharing information and providing training on the Code of Conduct and fundamental rights, such as equal opportunities and the prohibition of discrimination, establishing external partnerships, and participating in working groups.

To promote the internal and external dissemination of good gender equality practices, we maintain institutional cooperation relationships with external entities specialised in the matter. Our affiliation with the [LEAD Network](#), whose purpose is to enhance diversity in leadership, particularly female leadership, has enabled us to participate in several awareness-raising and best practice sharing forums, in a mentoring programme aimed at the personal and professional development of mentees from different companies, and in an inclusive leadership programme, the objective of which is to provide tools for promoting an inclusive work environment. In 2024, we began the second affiliation cycle, with the Holding Company and Biedronka represented in the various programmes.

We also continue to participate in the “SDG 5 Gender Equality” working group, led by [GRACE – Responsible Companies](#) (an entity comprising over 30 organisations in Portugal that work together to respond to these challenges), and in [iGen – Business Forum for Equality](#), a CITE initiative that seeks to establish itself as an ambassador for equality and as a specialised centre of expertise in this field.

Multigenerational workforce

The generational diversity of our workforce is a critical success factor in ensuring the necessary skills and experience for the sustainability of our business and our leadership. We promote the hiring and creation of development opportunities for people of all age groups and encourage cooperation between different generations. In 2024, we hired 24,208 people under the age of 30 and 1,847 people over the age of 50.

At Ara, the National Training Service (SENA - Serviço Nacional de Aprendizagem) programme is one of the main mechanisms for integrating young talent, with 675 people being hired in 2024.

During the Christmas holidays, Pingo Doce invites the children of employees aged between 16 and 25 to have a brief professional experience in the stores, and in the summer it offers an academy for young people to have the opportunity to get to know the business and develop their communication and interpersonal skills. These initiatives had 352 and 131 participants in 2024, respectively.

Biedronka and Hebe have training programmes in place aimed at bringing together the different generations comprising the teams, focusing on intergenerational communication, cooperation, feedback and a culture of appreciation. In 2024, a total of 56 people were trained in these topics.

To capture the best that each generation has to offer to the rest, we held the JM Talks, sessions to inspire and for business knowledge sharing between experienced and junior leaders of the Group, in which 547 people participated. Biedronka implemented a reverse mentoring model, through which young people supported 12 seasoned employees in the development of technological and intergenerational management skills.

Inclusion of minorities

[ESRS S1-12]



We adopt an inclusive approach towards the communities to which we belong, creating employment, training and development opportunities also for those who face disadvantages in accessing the labour market. We do this through innovative programmes, methodologies and infrastructures, actively working to increase recruitment opportunities and facilitate their integration.

	Employees with disabilities and/or an impairment					
	Women		Men		Total	
	#	% of all women	#	% of all men	#	% of the workforce
Group	1,597	1.5%	685	2.0%	2,282	1.6%
Portugal	495	2.2%	365	2.9%	860	2.4%
Poland	1,051	1.4%	276	2.1%	1,327	1.5%
Colombia	51	0.6%	44	0.3%	95	0.6%

Incluir (Include) Programme, launched in 2015 in Portugal, aims to create training and hiring opportunities for people with disabilities and/or impairments, migrants, refugees and people at social risk. The programme follows a methodology that is customised to each person and adapted to the roles available in each business area, encompassing training in psychosocial skills and practical on-the-job training, as well as adaptation of the workstation (physical or functional).

Based on a network of 124 partner institutions that support us in identifying potential candidates, the process begins with the application, followed by the recruitment and selection process, carried out by an internal technical team specialised in rehabilitation and social integration, which consists of an analysis of the skills profile and motivations of each applicant. An individual plan is then created, which may include training, and each candidate is assigned a case manager who supports them throughout the entire process.

The initial stage of the training lasts two weeks and takes place at the Incluir Centres in Lisbon and Porto. The first week is dedicated to learning interpersonal skills. The second week is spent in the simulation stores, a space that allows candidates to simulate the main operational tasks that they will perform in a store in the future (such as replenishment, checkout and counter service), at a comfortable and safe environment. Each Incluir Centre was built with all types of diagnoses, disabilities and impairments in mind. The Centres have lifting platforms, signage and fonts that make it easier for blind or partially-sighted people to read, tactile maps of the spaces and text transcription into Braille, colour codes (for people who are colour blind), use of soft colours and adjustable lights (for greater comfort for people with autism and Asperger syndrome), among other adaptations. The Incluir Centres are spaces open to the community and feature exhibitions of works of art created by people with disabilities from different institutions.

The second stage of training lasts ten weeks and takes place in a real work context, with the support of tutors and the technical team of the Incluir Programme. In 2024, we had 80 tutors, who received initial training to prepare them to welcome, integrate, support and maximise the potential of the trainees they take under their wing. Tutors also receive “Liderança para a Diferença” (Leadership for the Difference) training, which was specifically created to raise awareness among leaders and give them tools to manage difference, welcoming, supporting and developing each person, without unconscious bias. By 2024, this training had covered 4,546 leaders.

Since its launch in 2015, the Incluir Programme has reached 2,059 people. In 2024, the programme saw 350 people involved, 92 of whom were hired.

As a result of the work carried out in Portugal, since 2021 Recheio and the Holding Company have been an Inclusive Employer Brand, a distinction awarded by the Portuguese Institute of Employment and Professional Training (IEFP)⁶³, with the Group's Holding Company having risen to the level of "Excellence" in 2023. Pingo Doce has been an Inclusive Employer Brand since 2023 and, in 2024, was distinguished as Master Diversity, Equity and Inclusion by *Distribuição Hoje* magazine.

In 2024, Biedronka strengthened its strategy of integrating people with disabilities and/or impairments with the creation of a self-checkout support function, the purpose of which is to support consumers in using automatic checkouts and promote quality customer service. At the end of the year, the Company had 1,310 self-checkout assistants distributed across 427 stores (11.4% of the Biedronka network).

To ensure the onboarding and integration of these employees, store managers and senior operations managers receive training on diversity and inclusion topics, including minimisation of unconscious bias. Biedronka conducted a diagnostic on the Dla Nas intranet and its chatbot to assess the level of accessibility and introduce the necessary improvements. Both tools achieved the 'AA' level of compliance, the second highest score.

The Companies in Poland have continued to focus on integrating Ukrainian employees. In 2024, we had 4,208 people of Ukrainian nationality in the Group, 98.8% of whom in Poland. To facilitate their journey within the organisation, Biedronka and Hebe have the following mechanisms in place:

- a team responsible for recruiting and integrating migrants;
- content and recruitment channels adapted for the Ukrainian population;
- onboarding, communication, and occupational health and safety materials and operational processes, such as store checkout, in Ukrainian;
- internal channels with useful information in Ukrainian, including a chatbot to support employees;
- support for the immigration process;
- language training in Polish for Ukrainian employees and in Ukrainian for Polish coordinators.

JMA has a high need for hiring employees of non-Portuguese nationality, so investing in the integration of immigrant employees is a constant commitment. The Company structured a new team dedicated to recruiting and integrating these employees, and it has developed an integrated approach that, among other aspects, includes training in Portuguese, mobility, and housing solutions, and legal and tax support. For foreign employees who are not employees who support seasonal agricultural campaigns, a practical welcome guide has been created in ten languages (including Thai, Hindi and Nepali) with essential information on health and safety at work and the cornerstones for good communication.

Creating opportunities for people who are at a disadvantage in accessing the job market because they are at social risk is another aspect of how we include minorities.

Biedronka and Hebe offer two-month internships in their stores to young adults who live or have lived in orphanages. The "Dobry start z Biedronką" (Good start with Biedronka) and "Odkryj Siebie Z Hebe" (Discover yourself with Hebe) initiatives offer young people their first professional experience, training in essential skills to succeed in the job market and individual support from mentors. This is a partnership with the One Day Foundation, and since its first edition there have already been 68 participants.

Training and skills development



Training

[ESRS S1-13]

[GRI 404-1]

We believe that investing in the lifelong learning and personal and professional development of our employees is one of the most important investments we can make as an employer, which also contributes to the sustainability of the path we have built. We seek to train our employees to excel in the performance of their duties and to provide them with the necessary tools to thrive in an increasingly demanding environment in the myriad contexts of their lives.

⁶³ Criteria: (i) recruitment, professional development and advancement; (ii) job retention and return to work; (iii) accessibility (employees); (iv) services and relationships with the outside world (community and customers).

In 2024, investment in training exceeded 17 million euros, resulting in over 8.9 million hours of training, equivalent to an average of 64 training hours per employee. With over 515,000 training courses, we reached 94.4% of our employees, 0.6 p.p. more than in 2023.

Key training indicators

	Average training hours per employee*								
	2024			2023			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Group	63	68	64	54	59	55	55	59	56
Portugal	53	63	56	44	59	49	37	51	42
Poland	61	52	60	54	43	52	57	43	55
Colombia	102	101	101	81	87	84	96	107	102
Slovakia	180	337	246	-	-	-	-	-	-
Czechia	31	0	31	-	-	-	-	-	-

* Training hours per employee = training volume divided by total number of employees.

	Training volume*			Total no. of training courses		
	2024	2023	2022	2024	2023	2022
Group	8,943,221	7,367,472	7,325,452	515,355	220,788	211,438
Portugal	1,991,698	1,761,827	1,450,067	66,292	57,417	48,869
Poland	5,292,027	4,449,299	4,605,471	445,658	160,859	160,320
Colombia	1,614,310	1,156,347	1,269,915	3,217	2,512	2,249
Slovakia	43,718	-	-	102	-	-
Czechia	1,468	-	-	86	-	-

* Training volume = number of hours multiplied by the number of participants in training.

[GRI 404-2]

The EducAction digital platform is the result of our commitment to democratising access to educational materials. Through this platform, all our employees can access, at any time and from any place, training content in different formats such as e-learning, video and documents supporting face-to-face training. In 2024, a total of 7,017 mandatory and optional training materials were made available, and the platform was used by more than 145,000⁶⁴ Group employees (9.6% more than in 2023), with an average of 58,453 active users per month.

Alongside this, we provide access to the Knowledge Share platform, a digital library that centralises more than 3,500 content materials (437 of which were added in 2024), such as news articles, papers, podcasts and webinars, which inspire and promote the self-development of our managers.

With a view to greater efficiency and innovation in the training of our employees, we have been testing the adoption of virtual reality in programmes mainly related to their onboarding in store operations and to health and safety at work. In 2024, we provided training using virtual reality to 5,910 employees in Portugal and Poland.

In addition to investing in training tools and content, we believe that we must leverage employee training to transfer and retain knowledge that exists within the Group. In 2024, Pingo Doce launched a Trainers Academy aimed at preparing employees for future supervisory and training roles, in which 34 internal trainers have participated.

⁶⁴Includes all employees who used the platform throughout the year, even those who were no longer with the Group as of 31 December 2024.

At a global level, there is the Exponential Leadership programme, which prepares internal trainers in leadership areas. By the end of 2024, 851 employees had already been trained by internal trainers who were prepared under this programme.

Business training

Specialising in the area of perishables is one of our major business focuses. The specific nature and demands of our perishable product offer require ongoing investment in training the operational teams that perform critical functions to ensure the best experience for our customers.

In Portugal, the Perishables School (focused on training in the butchery, bakery and pastry, fresh food and fish categories) has new training modules and now covers deputy store managers. In the meantime, the fruit and vegetable training programme has evolved into a training school for store managers and district managers. Recheio launched a Butchery School to, besides ensuring training in this area of specialisation, provide structure for the recruitment and preparation for the succession of employees in the meat section. In 2024, 23,492 people participated in the various perishables training programmes at Pingo Doce and Recheio.

In Poland, the basic and advanced modules of Biedronka's "Zostań Świeżoznawcą" (Become a Perishables Expert) programme trained 16,868 employees. In Colombia, 23,181 Ara employees were trained in perishables. In the Group as a whole, 25.4% more employees were trained in this critical area in 2024 than in 2023, which translates the Group's reinforced investment.

The Logistics School is a programme designed for employees at our distribution centres in Portugal and Poland focused on promoting a culture of continuous improvement in logistics processes. In the case of Poland, Biedronka already had a Logistics School and, in 2024, Hebe opened a School for the same purpose. In total, and throughout the year, 432 employees participated in courses of this operational area.

Customer service is an essential skill in our Companies. Over the course of the year, more than 45,000 employees received training in this competence. Of particular note is Pingo Doce, which extended the SVAL – "Sorridir, Vender, Agradecer, Limpar" (Smile, Sell, Thank, Clean) model to more stores, having trained 26,260 employees in the year. Recheio launched pilot project Number 1, a sales service model focused on supporting customers throughout their journey in the store, encouraging a proactive approach to advice and product presentation, aimed at delivering the best customer service on the market.

As concerns commercial skills, 134 employees received a total of 3,424 training hours throughout 2024. The following contributed to this training volume:

- the "Biedronkowa Akademia Kupca" (Biedronka Shopping Academy) programme, specialised in the development of category management skills and aimed at employees in the commercial, marketing and logistics areas;
- the Commercial School, a transversal programme across several Companies focused on developing advanced category management skills;
- Ara's Commercial School, launched in 2024, aimed at developing sales, customer service and new product launch skills for store employees.

The 100% online degree course in Commercial and Retail Management, the result of a partnership between Jerónimo Martins and Universidade Católica Portuguesa, impacted 58 employees in 2023 and 2024. The initiative is co-financed by the Group, for the benefit of employees, and seeks to respond to the need to prepare future professionals for the distribution sector, with a special focus on food distribution.

Management and leadership training

The growth of our people within the Group is the result of our commitment to self-development, but also of the tools made available to employees, including leadership training.

Of particular note is the Be a Leader programme, created in 2018 in partnership with the Centre for Creative Leadership (CCL), which stands out for being fully customised to the needs of our businesses and for having a value proposition leveraged in training stages adapted to each phase of the leadership journey (Leading Self, Leading Others and Leading Teams). These paths include classroom training, individual coaching and participation in collaborative learning groups focused on sharing experiences and

interpersonal development. Since the launch of Be a Leader, and by the end of 2024, a total of 1,437 employees in the Strategic and Managerial levels had been trained. In 2024, the year in which we reviewed the training content to ensure full alignment with our Values, we trained 265 people under this programme, having invested over 1.2 million euros.

Created in 2023, the mentoring programme had a third pilot project in 2024, focused on accelerating the development of trainees in Portugal and promoting leadership by example. In total, the three pilot projects impacted 81 mentor-mentee pairs from the trainee programme and the IT Department. As part of a partnership with LEAD Network, employees from the HR teams participated, as mentors and mentees, in a knowledge transfer programme between people from different companies in the retail and consumer goods sector worldwide.

In 2024 we continued to train executives through the Strategic Management Programme, a partnership with Católica Lisbon School of Business & Economics and the Kellogg School of Management. This programme, tailored to the Jerónimo Martins reality, consists of a learning experience with access to management materials and excellent teachers and in 2024 meant an investment of 542,000 euros in the development of high-potential leaders from our Companies in Portugal, Poland, Slovakia and Colombia.

Recheio enhanced its “Programa de Especialização de Gestão de Loja” (Store Management Specialisation Programme), allowing Heads of Perishable to not only participate in the training programme, but also refresh the knowledge acquired throughout the year. Pingo Doce continued to invest in the “Programa Geral de Gestão de Loja” (General Store Management Programme), aimed at developing management and business skills. Together, and since they were created, the two programmes have trained 1,377 operations leaders.

Pingo Doce has the Michelin Star Chef programme, dedicated to developing chefs and sous chefs in Meal Solutions’ central kitchens in communication, emotional management and control, conflict management and team motivation. In 2024, this programme impacted 51 employees.

At Biedronka, the “Akademia Zarządzania Biuro” (Leadership Academy) and the General Management Programme, which also covers Hebe employees, enabled 35 employees to develop skills in these areas. In operations, in addition to the “Akademia Zarządzania dla SOM” (Management Academy for Senior Operations Managers) and “Biedronkowa Akademia Zarządzania 2.0” (Biedronka 2.0 Management Academy) programmes, which had a total of 869 participants in 2024, the “Biedronkowa Akademia Zarządzania – Zaawansowana” (Advanced Store Management Academy) was created, to update the knowledge of experienced store managers.

Ara launched a new Leadership Academy with 5,253 participants in 2024.

Leadership development



The development of our current and future leaders depends both on their self-awareness and commitment to development, and on the tools and opportunities we provide to help them achieve their full potential. We have processes such as self-assessment, performance appraisal, ongoing feedback, identification of potential, and personalised development plans, in addition to opportunities for internal mobility and career progression.

Performance appraisal

[ESRS S1-13]

[GRI 404-3]

The annual performance management cycle is based on the principles of meritocracy, equal opportunities and non-discrimination. The global process includes the definition, monitoring and evaluation of objectives and behaviours. Managers share feedback at key moments throughout the year, contributing to the individual development of employees, and discuss with those being evaluated their career opportunities and personal development plans.

	% of eligible employees who participated in performance appraisal		
	Men	Women	Total
Strategic	100%	100%	100%
Managerial	100%	100%	100%
Operational	100%	100%	100%

Assessment of potential and development

Potential assessment is a strategic tool for monitoring talent in the organisation, contributing to the development of employees and their careers, while providing the Companies with information to support decision-making on human resources and the succession pipeline. In 2024, this assessment covered 8,278 employees in the Strategic and Managerial levels and those in critical functions in the Operational level. In the case of Meal Solutions at Pingo Doce, talent mapping was implemented for the first time, which collected 360-degree feedback from the majority of the business unit's employees (including 396 people from the Operational level).

In 2024, a total of 4,403 personal development plans were monitored for employees in the strategic and managerial functional levels, and for employees in the operational level identified as having potential for progression or urgent development needs. These personal development plans identify concrete actions to mitigate development needs identified in the performance appraisal and to develop new skills.

Biedronka's Sukces(i)ja (You are success) talent programme, focusing on the development of the "learning agility" skill, saw the voluntary participation of 115 employees, who were identified with potential for progression. In 2024, the Company also tested a model that uses generative artificial intelligence to create personalised development plans for 1,238 employees. This platform aggregates information from performance appraisal systems, potential assessments and other questionnaires, and feeds the identification of training needs.

The HebePro programme, designed to develop store managers with progression potential, has been extended to area managers. HebePro for area managers is a six-month programme with online training sessions, practical sessions led by experienced employees in that role, and a mentoring module. In 2024, 82 employees from both target groups participated in this programme.

We believe that self-awareness plays a key role in the development of our leaders and how they contribute to the development of their teams. In 2024, we launched a development programme that included a 360-degree assessment, using CCL recognised methodologies, an individual assessment supported by the Hogan methodology (which uses personality and cognitive tests to develop leaders), and an executive coaching journey. In its first year, this programme was aimed at the Group's Managing Committee, the Management Committees of Portugal Companies, and a pilot group of managers identified as having high potential. A total of 79 employees were involved, in an investment of 354,000 euros. The goal of this programme is to reinforce current leadership, and to bolster the identified areas for improvement in future leaders, particularly in terms of the Group's behaviours and Values.

Internal mobility

We believe that internal mobility – due to the challenge inherent in performing new functions in other areas, Companies or countries and the acquisition of transversal knowledge across different businesses – is a critical part of the professional and personal growth of our employees, while also playing an important role in the internal response to the Companies' needs.

42,819 People who changed roles, workplace or Company (30.6% of total employees)	7,075 People who were promoted to roles of greater responsibility (5.1% of total employees)
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Through the Hello JM channel, an internal human resources management platform, our employees have access to vacancies to which they can apply at any time. We thus offer each person the possibility of shaping their path within the organisation.

At the same time, the performance appraisal process includes specific moments for employees to express their preferences, ambitions and identify the new challenges they would like to take on. In Portugal, Pingo Doce employees can submit transfer requests between stores via the Sou Pingo Doce (I am Pingo Doce) app. In 2024, a total of 195 transfers were made using this app.

As a reflection of the Group's vision of the potential for development in internal mobility, Recheio launched the PUSH programme, focused on designing a mobility plan for employees under 35 years of age who are identified as having high potential. The goal is for these people to perform roles in other Companies for certain periods, to develop leadership skills. Also in 2024, Recheio and Pingo Doce launched projects to identify employees in operations with key skills or academic qualifications for future internal mobility and/or progression.

We are currently testing a workforce planning tool in order to identify recruitment needs and anticipate future employee movements (such as mobility, retirement, expatriation). With a primary focus on headquarters teams, the aim is to annually map the needs for the subsequent three years, as well as the skills required for roles to be recruited internally or externally. In 2024, the tool was tested in the three most relevant countries, with the assessment having covered 4,552 employees.

Young talent

To nurture our leadership pipeline, we have several talent development programmes in place, which are regularly enhanced to keep them attractive and aligned with participant expectations and business needs. All these programmes are remunerated in accordance with our compensation policies.

One of the programmes with the most significant investment in this area is the [Trainee Programme](#), revised in 2024 to ensure alignment at a Group-wide level. This two-year programme challenges participants to strengthen their skills in order to become future leaders of the Jerónimo Martins Group. During the first year, designed to promote participants' self-awareness and assess the cultural fit between them and the Group, trainees develop two projects with the support of tutors in different functional areas, according to their individual preferences and the Companies' needs. The second year gives participants an immersive experience in the retail business and access to a mentor. The programme provides all participants with several opportunities to meet with the Group's senior management, allowing them to share their career expectations and immediately influence their path within the organization. In 2024 the Trainee Programme had 85 participants, 37 of whom started the programme during the year.

The [Summer Internship Programme](#) is a two-month programme, held during summer holidays, in which university students spend time at one of our Companies. The young people are accompanied by a tutor and during the programme they are challenged to develop projects in the functional areas they are part of. In 2024, we had 73 higher education students in Portugal and Poland. In Colombia, we had 31 interns in the year.

The [professional internship programme](#) is aimed at university students or recent graduates who wish to embark on an intensive professional experience in Portugal, and lasts from six months to one year. During the internship, the participants are given the opportunity to enhance their academic knowledge, by joining one of the business teams. Each intern develops a specific project and receives guidance from a tutor, which ensures a learning environment and support for their professional development. We had 20 interns under this programme in 2024.

The [Ambassador Programme](#) enabled 19 participants to represent the Jerónimo Martins Group at their universities in Portugal, also giving them the opportunity to learn more about our businesses and introducing them to the retail sector.

Each Company also has young talent programmes adapted to their business context. This is the case of Recheio, which saw 24 participants in Campus Recheio 2024, an initiative aimed at strengthening the employer brand, which includes curricular, professional and seasonal internships, ambassador programmes, academic work and business visits. The programme Futuro JMA (JMA Future), in the agrifood business, includes curricular, professional and summer operational internships that are customised to the specificities of this business, in which 19 people participated.

Personal empowerment

We believe that the path of each employee is strengthened by the opportunity to participate in initiatives with significant impact for the Group and for communities.

Active participation

[ESRS S1-2]



We encourage employees to actively engage in moments of sharing, ensuring that everyone feels safe to express themselves within the organisation. Throughout the year, with the aim of regularly and quickly measuring employee satisfaction with key aspects that impact them or could impact them in a regular and agile way, several surveys were conducted on topics such as health and safety at work, employee support services, and a satisfaction survey was also made available on the features available in Hello JM (Our global technological tool for human resource management). In addition, the Group's engagement policy provides for a Group-wide employee satisfaction survey to be carried out every two years to gather employees' views on critical dimensions of human resources management and subsequently design action plans at team, Company and Group level to address the concerns identified. Since listening to employees is a strategic priority for the Group, the global Chief People Officer role has ultimate responsibility for this process in all countries, ensuring that obtained results lead to implemented action plans.

Regular meetings are held in live broadcast format, with a view of bringing employees and executive management closer together and improving communication flows within the Companies. At Biedronka, three editions took place with simultaneous interpretation into several languages, and at Ara the "Juntos para Vencer en Vivo" (United to Win – Live) format, launched in 2024, featured three sessions focused on sharing the Company's strategic objectives and results. In total, more than 15,000 views of these sessions were registered.

Biedronka and Hebe launched new editions of their internal idea generation competitions, in which each employee has the opportunity to contribute to the future of the organisation by submitting ideas and suggestions for the continuous improvement of processes and the work environment. In the case of Hebe, the 2024 competition focused essentially on generating wellbeing ideas. Between the two Companies, 1,637 employees participated in this initiative in 2024, with over 2,850 ideas shared.

Biedronka and Hebe employees can also refer candidates to join recruitment processes. A Group-wide pilot referral programme for IT professionals was completed. In 2024, within the scope of these programmes, 1,058 people were hired as a result of internal recommendations.

In addition, to listen to employees and their representatives about the real and potential impacts on the workforce, we have several social dialogue mechanisms in place, which can be consulted in the subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Ethics and compliance", subpoint "Freedom of association and collective bargaining" in this chapter.

Working with purpose and meaning

We promote a sense of individual responsibility and create conditions for volunteer initiatives and active participation in society, so that employees reinforce the sense of purpose in their work, while generating a positive impact on the communities of which we are part of.

Hebe offers one day of work per year for each employee to dedicate to volunteering at an institution of their choice. In 2024, a total of 17 employees benefited from this measure. The Company's employees also contributed by collecting clothes to give to underprivileged young people and by responding to Christmas requests made by children with cancer.

Biedronka gave its employees the opportunity to dedicate two hours of work to preparing Christmas hampers for families in need, with 867 employees having participated. The Company also held another blood drive at its offices.

Compensation and benefits

[ESRS S1-10]



The pay strategy of the different Companies follows three principles that we believe are key to meeting our responsibility as a benchmark employer in the countries where we do business:

- Creating a positive impact on our people, ensuring a balanced and dignified standard of living for employees and their families.
- Making sure that pay packages are competitive and adjusted to different functional levels and contents, ensuring that our policies and processes are in keeping with principles of fairness and equity.
- Recognising the effort and commitment of our teams, the achievement of results and the exceeding of targets, singling out and reinforcing exemplary performance and behaviour.

Take-home income

We guarantee an adequate base salary that affords a decent standard of living and is adjusted to the socio-economic context in each country in which we do business. We endeavour to follow criteria of fairness, internal equity and meritocracy when determining and reviewing the fixed remuneration of each of our employees, taking into account, among other factors, the content and responsibility of their role and the different levels of seniority. We set competitive entry-level salaries compared to national minimum wages and ensure pay increases in line with experience and performance levels.

The rise trend in the national minimum wage is common to the three countries where we have our main operations. In Poland, the national minimum wage is reviewed every two years (in January and July). In 2024, the Polish minimum wage increased over 19% compared to 2023, strengthening the significant growth trend of the past five years (over 65% since 2020). To remain competitive, Biedronka increased entry-level pay by 19%. In Portugal, all our Companies ensured an increase of up to 8% in their minimum entry-level salaries, in line with the increase of the national minimum wage.

The Companies' efforts have enabled the take-home income of our employees to remain above the national minimum wage of each country in which we do business. We therefore continued to ensure that all Jerónimo Martins Group employees received adequate salaries, in accordance with the applicable benchmarks⁶⁵.

Portugal	Poland	Colombia
Take-home income between 17% and 60% above the national minimum wage.	Take-home income between 9% and 17% above the national minimum wage.	Take-home income 12% above the national minimum wage.

We endeavour to ensure fair compensation, considering the demands, functional level and responsibility, seniority and the performance of each employee. Most of our employees see their salary reviewed after the first year of employment, as a means of rewarding their commitment and promoting differentiation based on experience and autonomy. We also have merit-based salary review processes in all the Companies.

In 2024, comparing the average salaries of the Group's different Companies with the respective national minimum wages, there was a differentiation of at least 23%, which could be double that reference, as is the case in Ara (Colombia).

⁶⁵ Comparing the lowest monthly income of the lowest remuneration category, equivalent to full-time working hours, excluding trainees and apprentices, with the applicable national minimum wage pursuant to the laws in each country and/or by collective bargaining, where applicable. Take-home income is calculated based on the lowest salary, plus any established additional payments that are guaranteed to all employed workers. In Portugal, this includes the entry base salary and meal allowance. In Poland it includes the entry base salary and presence allowance, and in Colombia it includes the entry base salary, meal allowance and transport allowance. We consider that Slovakia and Czechia, which account for 0.2% of our total workforce, are not yet sufficiently representative to calculate this indicator.

Recognition

All our Companies established mechanisms for recognising the effort and commitment of our teams, to single out exemplary performance and behaviours. We invested approximately 354 million euros in employee recognition measures (bonuses, awards and other mechanisms) in 2024, 13% more than in 2023. We highlight the following measures, applicable to all employees regardless of their workload:

- 143.2 million euros in awards resulting primarily from the performance of the Companies and the Group, and extraordinary award paid to several employees (around 91,000 employees);
- 175.9 million euros in awards and bonuses related to sales performance, non-absence and others;
- 7.9 million euros in seniority bonuses, as a way of recognising the loyalty and commitment of employees.

The local commitment to recognising employees was reinforced in 2024, with the following measures standing out:

- Pingo Doce reinforced its offer of incentives to operational teams;
- Recheio offered at least one monthly performance bonus, including the monthly store bonus, sales incentives, productivity bonus and the bonus related to Amanhecer store openings;
- Ara introduced incentives based on team performance in all its stores and distribution centres, substantially boosting the total income of Colombian employees;
- the Companies in Poland maintained their recognition strategy as a way of boosting business results and, consequently, employee's available income.

Taking into account the hard work of all operational teams, who strived to increase sales volumes on a comparable basis (like-for-like), while limiting the impact of deflation on sales and profitability throughout the year, the Board of Directors decided to grant an exceptional reward during the Christmas season to non-management employees in Poland and Portugal, totalling 26.7 million euros, distributed as 18.1 million in Poland and 8.6 million euros in Portugal, benefiting over 100,000 employees.

Benefits

[GRI 401-2]

Supplementary benefits are a key component of a more robust value proposition that meets the needs of employees. Depending on their level of responsibility, employees have a benefits package that can include life insurance, health insurance, travel accident insurance, and a pension plan. These benefits are complemented by a package of work tools designed to make it easier for employees to carry out their duties, in addition to the wide range of family support and employee wellbeing measures.

We pay close attention to the needs, expectations, and preferences of our employees in the various countries, so we offer flexible benefit plans. This is the case with Bolsa Flex, a mechanism through which 5,265 employees of Pingo Doce, Recheio, JMA, and the Holding were able to decide, among the various existing options, how to use the available amount. Similarly, Hebe employees can allocate part of the sum from the Social Fund (a legally required mechanism in Poland) to 2,647 available options, giving them complete flexibility over how to use their money.

Health and safety at work

[ESRS S1-1; S1-14]

[GRI 403-1]



Having a Health and Safety at Work (HSW) management system in place is essential to our commitment to ensuring that our employees are protected, especially in store and logistics operations, where they are exposed to a greater risk of work-related accidents and work-related ill health. In 2024, 100% of the Group's workforce was covered by a HSW management system.

We therefore have formal policies, processes and procedures that guide the actions of our teams in risk assessment and management, accident and occupational ill health management, audits and drills, as well as training and awareness-raising activities for the adoption of safe behaviours.

Key incident indicators

[GRI 403-9; 403-10]

Work-related accidents	
Employees	
Number of fatalities	1
Number of high-consequence work-related injuries	49
Number of recordable work-related injuries	4,300
Hours worked	219,831,048
Rate of high-consequence work-related injuries *	0.22
Rate of recordable work-related injuries **	19.56
Number of days lost due to injuries	2,609
Workers who are not employees	
Number of fatalities	2
Number of high-consequence work-related injuries	0
Number of recordable work-related injuries	219

* Rate of high-consequence work-related injuries (except fatalities) = (Number of high-consequence work-related injuries except fatalities / Total Hours Worked) x 10⁶. High-consequence work-related injuries are those that result in the employee being absent for more than 180 days.

** Rate of recordable work-related injuries = (Number of recordable work-related injuries / Total Hours Worked) x 10⁶. Following the adoption of the reporting standards (ESRS) introduced by the CSRD, and in order to respond to data requirement S1-14, the accidents considered for the calculation of this indicator are now those that result in fatalities, days away from work, limited work or transfer to another job, medical treatment beyond first aid or loss of consciousness.

In 2024 there were 4,300 recordable work-related injuries, 12.7% less than in the same period last year, of which 49 were of high consequences, resulting in a rate of recordable work-related injuries of 19.56 (16.0% lower than the rate of 23.29 registered in 2023) and a rate of high-consequence work-related injuries of 0.22 (38.7% higher than the previous year, which stood at 0.16). In the case of workers who are not employees, there were 219 recordable work-related injuries. In addition, there was one fatality of a Pingo Doce employee and two fatalities of workers who are not employees.

Work-related ill health	
Employees	
Number of fatalities	0
Number of cases of recordable work-related ill health	117
Workers who are not employees*	
Number of fatalities	0
Number of cases of recordable work-related ill health	7

* In Poland and Colombia, the number of recordable work-related ill health among workers who are not employees is not yet monitored. We continue to improve our information systems to ensure that we report all the information requested by the indicator.

In 2024, 117 cases of recordable work-related illnesses were recorded, which corresponds to an increase of 11.4% compared to the same period last year.

Risk identification and assessment

[ESRS 2 SBM-3]

[GRI 403-2]

Our local HSW teams are tasked with identifying risks and assessing them in order to eliminate or minimise existing work-related risks. Assessments are carried out using a method that enables us to quantify the magnitude of the existing risks and thus prioritise them according to a risk matrix. The matrix covers all areas and processes assessed, and includes the collection of information about the circumstances, causes, effects, levels of exposure, severity and risk, and the most appropriate remedy/recommendation. A new methodology for risk identification and assessment is currently being implemented to ensure alignment with the ISO 45001:2024 standard.

There are seven different types of risks:

- environmental (physical, chemical and biological);
- mechanical;
- electrical;
- fire and/or explosion;
- ergonomic;
- psychosocial;
- organisational.

As food distribution accounts for over 98% of our sales, there are activities that could pose risks to employees who, in warehouses, industrial kitchens and stores, deal with the loading/unloading and storage of products and their processing (e.g. fish and meat cutting, bread making, and meals preparation). Jerónimo Martins Agro-Alimentar employees work in the primary and secondary sectors and are also exposed to specific risk factors, such as unfavourable thermal environments, with possible vascular injuries, physical exertion, with possible musculoskeletal injuries, and contact with machinery, with possible trauma, wounds and electrocutions.

Risk assessment and the respective findings are key to identifying and selecting work equipment and tools, preparing procedures and work instructions, planning training content and individual protection measures, and for defining initiatives that promote the continuous improvement of the HSW management system.

Risk control measures

[ESRS 2 SBM-3]

[GRI 403-3; 403-4; 403-5]

Work and personal protective equipment

Work-related risks require the selection of appropriate work and personal protective equipment. Whenever the need to install new work equipment is identified, the safety requirements are defined in advance and checked after installation. Work instructions are drawn up that include safety, handling, maintenance and cleaning actions, and are provided to employees. The equipment manufacturer/representative also trains the teams. The need to use personal protective equipment (PPE) is also identified in the risk assessment and selection is based on user tests and a technical assessment.

The Companies continually evaluate the need to replace equipment and test it regularly to prevent work-related accidents and work-related ill health. In 2024, for instance, and to improve safety, productivity and employee wellbeing, Pingo Doce rearranged the fish counter in 64 stores, investing over 920,000 euros. JMA continued to invest in the renewal of safety equipment, with the purchase of gas detectors in confined spaces, fire cabinets, individual diving computers and flotation devices standing out in 2024, in an investment of 67,000 euros.

Self-protection measures

Companies provide and periodically put into practice – with the aim of testing their effectiveness – self-protection measures that include safety records, emergency plans and prevention plans and procedures.

In Portugal, the programmes “Segurança Assim Sabe Tão Bem (It's Good to Feel Safe), which replaces the former “Segurança Máxima” (Maximum Safety) programme, from Pingo Doce, and “Segurança em Ação” (Safety in Action) from Recheio, encourage store teams to adopt safe behaviours throughout their day-to-day operations. These programmes are preventive and involve close monitoring and immediate intervention, when behaviours that could potentially result in a work-related accident are identified.

Ara's “Mi CEDI Seguro” (My Safe Distribution Centre) programme includes several preventive measures such as daily inspections of equipment and racks, monthly safety observations, warm-up exercises before each shift, and training for new employees, with the support of emergency brigades (employees certified to conduct drills, support safety initiatives and provide assistance in emergency situations). HSW skill assessments are also carried out and training plans drawn up based on the findings. Based on the safety metrics assessed, and to encourage employees to adopt safe behaviours, the Company recognises the distribution centres with the best HSW performance and rewards them with leisure and wellbeing measures. Ara also has 380 HSW leaders trained to observe and promote safe behaviours.

Training and awareness-raising

We believe it is equally important to invest in making employees aware of the risks inherent in their jobs and the importance of adopting good practices through training. The general training plan and the contents thereof are reviewed each year and training is provided at different points in an employee's career, such as when they are hired, when they change jobs, when new equipment or tools are introduced or when existing ones are modified. Based on their role and the risks associated with it, employees are also given access to pre-defined training courses.

The Impact Programme, created in 2023 for all Group Companies in Portugal, has two components, with a total of 676 participants and a total of 4,732 hours of training:

- Laboratórios de Segurança (Safety Labs), with training sessions led by the Company's safety technicians to teach safety delegates how to encourage the teams they work with to adopt safe behaviours and cultivate a self-care approach;
- Liderança com Impacto (Leadership with Impact), an initiative launched in 2024 specifically for operations managers (stores, logistics and central kitchens), given their role in transforming team behaviours, demonstrating that humanised leadership can more easily influence employees to adopt safe behaviours, thus preventing work-related accidents and work-related ill health.

At Biedronka, of note is the "Biedronkowa Akademia Zdrowia" (Biedronka Health Academy), focusing on preventing work-related ill health through health and safety training sessions led by physiotherapists who teach employees how to prevent musculoskeletal injuries, including physiotherapy appointments and daily warm-up exercises. In 2024, 3,322 employees were trained and 30,243 appointments facilitated.

	Employees trained in HSW			HSW training volume*		
	2024	2023	2022	2024	2023	2022
Group	74,267	63,221	76,875	430,181	388,831	444,494
Portugal	25,779	23,109	25,192	72,723	72,062	74,902
Poland	35,871	30,807	40,133	311,650	274,655	335,216
Colombia	12,486	9,305	11,550	44,176	42,114	34,376
Slovakia	131	-	-	1,632	-	-

* Training volume = number of training hours provided multiplied by the number of participants.

Health

We have doctors who specialise in occupational health who visit different workplaces to assess health impacts on our people and prescribe corrective actions, and to carry out medical fitness tests.

We carry out health assessments at the start of employment, as well as regular and periodic examinations to monitor employees' health throughout their professional lives and to assess their physical and mental fitness. In 2024, we carried out 137,064 occupational health assessments.

In Portugal, our two mobile health units help increase the frequency of health assessments, thus ensuring that employees are fit to work, and to treat and prevent illnesses and injuries associated with each function. These units are vehicles that have been converted into fully-equipped medical offices that complement the in-house consultation rooms in some workplaces and travel around the country. These mobile units assisted 4,366 employees in 2024.

Continuous improvement of the health and safety at work management system

[ESRS S1-14]

[GRI 403-1; 403-2; 403-4; 403-8]

We strive to ensure the continuous development and improvement of our HSW management systems, performing audits and drills, investigating accidents/incidents, and consulting and involving our employees in decision-making.

Audits – assessment and analysis of the factors that can lead to accidents/incidents, monitoring the remedy mechanisms, communicating the outcomes to stakeholders, and designing and following up on action plans until they are completed.

Drills – regular and controlled drills to test self-protection procedures in order to identify potential deficiencies and minimise the risk of mistakes in emergency response, by structuring and monitoring a corrective action plan.

	Audits			Drills		
	2024	2023	2022	2024	2023	2022
Group	9,765	11,002	9,661	5,244	4,797	4,129
Portugal	599	601	570	270	262	277
Poland	7,789	9,121	8,127	3,645	3,252	2,908
Colombia	1,377	1,280	964	1,329	1,283	944

Accident investigation – assessments and investigations are carried out after an incident has been reported to ascertain the facts, circumstances and possible causes, and to design, monitor and report on corrective action plans implemented to prevent it from happening again.

Employee consultation and engagement – in Portugal, employees are invited to share their opinion in two HSW surveys each year. In Poland, both Biedronka and Hebe have an HSW Committee that meets regularly, comprising employee representatives and representatives of the HSW teams. Biedronka also has 17 regional teams responsible for implementing and maintaining the HSW system. In Colombia, the HSW Committee raises awareness about situations that may harm the health and safety of employees.

Certification of HSW management systems – certification of HSW systems promotes the principle of continuous improvement in workplace health and safety practices, ensuring alignment with international best practices. At Biedronka, the system is certified to ISO 45001:2018, covering all 3,778 workplaces (stores, distribution centres, soup factory and offices), and a total of 1,447 new work instructions were implemented to improve team protection. In Portugal, the Terra Alegre dairy factory (JMA) has its HSW management system certified to ISO 45001:2019. The two Meal Solutions central kitchens (Pingo Doce) are ISO 45001:2023 certified. In all cases, certification covers employees and workers who are not employee.

Certification of HSW management systems in Biedronka, Terra Alegre and Meal Solutions kitchens (Pingo Doce)	Total	%
Employees and workers who are not employees covered by the HSW system	102,051	100
Employees and workers who are not employees covered by the internally audited HSW system	102,051	100
Employees and workers who are not employees covered by the externally audited HSW system	24,839	24.3

Work-life balance

[ESRS S1-15]

[GRI 401-3]



Given the demanding nature of our Companies' operations, we endeavour to develop and implement solutions that give employees greater flexibility and improve their work-life balance, in particular by ensuring stable and predictable working hours. Thus, all Group's employees are entitled to family leave and to make use of it.

The Companies have invested in developing tools for efficient and equitable schedule planning and management, in line with employee preferences and business needs. Pingo Doce has an hours bank system in place, used by 22,433 employees in 2024, which allows them to take additional time off when it suits them best, in return for overtime worked. The Company has a scheduling solution that takes into account all legal rules, and also internal principles of fairness in shift assignment and stability in the lives of employees. This measure covered 26,887 employees in 2024, the year in which Pingo Doce tested a new solution that enables automated planning based on business data, such as sales and foot traffic in stores, improving the predictability of store needs at each moment. This pilot reached 542 employees of the stores being tested.

Biedronka implemented the Tikrow solution to address temporary labour needs in its stores. This platform allows candidates to view short-term positions available at Biedronka and to apply to work in one of its stores for a fixed period. Using this tool enabled the Company to meet 43,273 immediate needs in the year, minimising the negative impact of unforeseen absenteeism on store teams.

In Portugal, to facilitate the family management of employees in 2024, the three daycare centres⁶⁶, located in the Recheio store in Braga and in the Azambuja and Alfena distribution centres, took care of 225 children of employees who work there and at nearby stores. A total of 1,877 paediatric, child nutrition and speech therapy appointments⁶⁶ were also carried out at these daycare centres.

The Flexible Working Policy remains in force at our offices, and for all functions to which it applies, offering flexible working hours and the possibility of remote work, covering 6,617 employees across all the Companies.

Physical, mental and social wellbeing

Our commitment to employee wellbeing and work-life balance is reflected in various initiatives and programmes that promote their physical, mental and social wellbeing. In 2024, the Group invested over 7.8 million euros⁶⁷ in these types of measures.

In Portugal, we provide office and distribution centre employees access to different health and wellbeing services. The Jerónimo Martins Clinic offers general medicine, sleep, smart-ageing, psychology, and nutrition appointments, as well as nursing services, alternative therapies and physiotherapy and also dermatology, cardiology and health consultancy appointments. A total of 1,477 employees used the Clinic in 2024. The Wellness Centre includes a gym and services such as dermoesthetics and was used by 1,569 employees in the year.

Logistics employees have access to the Prevention and Physical Rehabilitation Centres located at the Azambuja and Alfena distribution centres. The aim of these centres is to help prevent, assess and treat physical illnesses and musculoskeletal injuries through physical therapy, gym and nutrition services. They also offer general medical appointments, podiatry appointments (introduced in 2024), and nursing services. A total of 1,165 logistics employees used the two centres in the period under review.

All employees and their children have access to a free teleconsultation service⁶⁶, available from 8am to midnight, seven days a week. The helpline is staffed by nursing professionals who, after screening, refer the patient to the most appropriate speciality. In the year, 1,264 employees used this service.

Employees also have the clinical nutrition programme⁶⁶ at their disposal, created to promote healthy eating habits and ensure the nutritional monitoring of employees with health problems, including weight issues, diabetes, hypertension and dyslipidaemia (excessive lipid concentration in the blood). In 2024, a total of 2,331 appointments were carried out and 902 employees supported under this programme, which includes nutrition appointments, literacy actions and environmental modulation (introduction of healthy eating options in workspaces).

In Poland, the Razem zadbajmy o zdrowie (Let's Take Care of Health Together) programme offers employees the chance to undergo a range of medical examinations with a market value 600 złoty (140

⁶⁶In order to expand its reach and social impact, the program was transferred to the Jerónimo Martins Foundation in 2024.

⁶⁷In order to expand their reach and social impact, some of the wellbeing programmes were transferred to the Jerónimo Martins Foundation during the year. The figures reported refer only to the investment made by the Jerónimo Martins Group until the respective transition.

euros), including vitamin, diabetes, hormone and cancer screening tests (allowing for the testing of tumour markers), among other preventive analyses relevant to the prevention of our people's health and specific to women and men. The programme also includes analysis of test results by a specialist and ultrasound scans for offices and distribution centres employees. In addition to increasing the type of analyses included, in 2024, it also provided access to discounts on complementary examination packages for family members. In 2024, 37,518 employees (15.1% more than in 2023) and 17,203 family members benefited from this programme, in an investment of over 1.3 million euros.

Biedronka and Hebe continued to invest in the physical wellbeing of their employees, encouraging physical exercise. The two Companies offer all their employees a sports card that gives them access to more than 5,000 facilities across the country. In 2024, a total of 13,066 employees made use of these measures, corresponding to an investment of 205,000 euros. Biedronka also finances the individual or group participation of employees who want to take part in organised sports, and offers running and cycling challenges where employees can take part individually or as a team to win prizes.

Protecting the mental health of our employees and their families is a priority for the Jerónimo Martins Group. To this end, we pay particular attention to prevention and health promotion initiatives, while offering psychological and psychiatric intervention in diagnosed cases.

In respect of prevention, we have focused on promoting literacy among our employees, raising awareness of the importance of mental health, helping to reduce the associated stigma, and sharing adaptive mechanisms for dealing with suffering associated with moments of greater fragility. Throughout 2024 we continued to support employees who, due to the nature of their jobs, have contact with a large number of other employees, preparing them to handle and support colleagues in difficult or sensitive situations. Support included the Cuidar do Cuidador (Caring for the Carer) programme, this year dedicated to Pingo Doce's operational HR managers, with the "carers" participating in an integrated model of training, supervision and individual coaching.

As regards intervention, the Mental Health Programme⁶⁸ in Portugal offers free psychology and psychiatry appointments for employees and their minor children, guaranteeing early access to care in order to minimise an aggravation of illness, especially where mental health support resources are scarce in the community. In 2024, this support, provided by a team of in-house psychologists and a network of external partners, reached 1,142 people requiring psychological and psychiatric intervention (767 employees and 375 children). A total of 209,000 euros was invested in the Mental Health Programme.

In Poland, the online platform Mindgram, initially launched by Hebe in 2023, was extended to Biedronka and both Companies registered 5,534 active users in the year under review. It is a free platform for all employees and extensive to family members, offering three types of support:

- educational support, through articles, webinars and podcasts on mental health, career development and personal finance;
- appointments with psychological support provided in unlimited online sessions;
- a chat room where employees and their families can exchange messages with and get help from professionals in psychology, law, finance, and other fields.

The Razem zadbajmy o zdrowie (Let's Take Care of Health Together) programme also includes access to psychiatry appointments. The Spokojna Głowa (Calm your Mind) programme at Biedronka shares digital content focused on topics such as motivation, healthy lifestyle, meditation, stress management and more. Throughout the year, this contents, together with webinars on mental health available on Mindgram, gathered 4,711 views. Ara and Biedronka also provide mental health helplines.

We believe in the positive impact that initiatives that bring people together and foster team spirit can have on the work environment and on our employees. In this regard, the following initiatives were carried out in 2024:

- Four communities of interest in Portugal, that is, Crazy about Running (which also exists in Colombia), Crazy about Padel, Crazy about Creativity, and Crazy about Cooking, which counted for 5,261 participations.

⁶⁸ In order to expand its reach and social impact, the programme was transferred to the Jerónimo Martins Foundation throughout 2024.

- A new edition of Momentos em Cheio (Enriching Moments), a month dedicated to the wellbeing and a sense of belonging of Recheio employees, saw the participation of 1,148 employees.
- Trips on board the Santa Maria Manuela (owned by the Group), in which 163 Biedronka and Pingo Doce employees took part.
- Meetings and gatherings between Biedronka's operations teams, financed by the Company and attended by 73,911 employees.
- Wellbeing Weeks, events held by Ara, Hebe, Meal Solutions and the logistics centres in Portugal, with around 7,000 employees taking part in various activities promoting physical and mental health.

Support to employees and their families

[ESRS S1-11]



In the main countries where we do business (Portugal, Poland, Colombia, Slovakia and Czechia), all employees are covered by social protection through mandatory public schemes against loss of income, and in which casualties such as sickness, unemployment, employment injury, acquired disability, parental leave, and retirement are included.

As a Group, we have a permanent commitment to making a difference in the lives of our employees and their families, and to supporting them in situations of vulnerability and/or social emergency, as well as in priority support areas such as health and education, through internal social responsibility (ISR) programmes that complement existing community responses. In 2024, we invested more than 48,4 million euros (a 33.5% increase in comparison to the previous year, mainly due to the reinforcement of prepaid cards that are allocated in Hebe and Biedronka).

	Investment in ISR by pillar of action (in million euros)		
	2024*	2023	2022
Group	48.4	36.3	35.4
Health	0.6	0.8	2.1
Education	2.0	1.9	3.2
Family support	**45.8	33.7	30.1

*In order to expand its reach and social impact, some of the ISR programmes were transferred to the Jerónimo Martins Foundation during the year. The figures reported refer only to the investment provided by the Jerónimo Martins Group until the respective transition.

**This includes a value of 6,044,378€ granted in loans to Biedronka employees, which is returned to the Company.

Health

In Portugal, the Mais Vida (More Life)⁷¹ programme (destined to support employees with cancer and their families) provides second opinion consultations and multidisciplinary support, which includes transportation, home care services and psychological support. In Poland, Biedronka supports employees with serious, life-threatening illnesses or disabilities by funding treatment and rehabilitation. In the year, a total of 237 employees received support under these two programmes, representing an investment of 180,000 euros.

In 2024, Biedronka created the Z troską o partnera (Taking Care of a Partner) programme, offering financial support to cover urgent expenses related to medical treatment for the spouses of employees. Hebe launched the Wracaj do zdrowia z Hebe (Return to Health with Hebe) programme, covering co-pay for treatment for employees and close family members involved in accidents with implications for their health or affected by an illness. In this launch year, 131 people (60 employees and 71 family members) benefited from the two programmes.

We support families with children suffering from rare diseases or those with special needs through the Famílias Especiais (Special Families)⁷¹ programme in Portugal and Mali Bohaterowie (Little Heroes)

⁷⁰ This includes 6,044,378 euros invested in the Możesz liczyć at Biedronka (You Can Count on Biedronka) programme in loans granted to employees, which will be repaid to the Company.

⁷¹ In order to expand its reach and social impact, the programme was transferred to the Jerónimo Martins Foundation throughout 2024.

programme in Poland. The investment of 378,000 euros in these programmes gave 494 employees' children access to treatment and medical equipment, among other forms of support.

The SOS Dentist programme in Portugal offers dental treatments to employees who are unable to afford them, and in 2024 it enabled the continuation of 321 oral health treatments, in an investment of 91,000 euros.

Education

In Portugal, the Online Study Hall⁷² programme continued to improve the school performance of employees' children attending Years 1 through 9. This free programme offers group and individual tutoring, depending on students' needs. The programme includes support in core subjects such as Portuguese, maths and English, and in any subject they are struggling with. In 2024, besides helping prepare students for the Year 9 national exams, we launched a pilot programme to prepare students to their Year 12 exams, in an effort to help employees and children of employees qualify for higher education. In total, the programme supported 1,789 students in the year, representing an investment of 196,000 euros.

The Aprender e Evoluir (Learn and Grow) programme, held in partnership with the Qualifica network of centres (specialising in the professional qualification of adults seeking education or vocational training certification), enables our employees to complete compulsory education during working hours. In 2024, a total of 323 people participated in the programme. We have also continued to help cover the costs of access to higher education (bachelor's or master's degrees) for our employees and their children through our scholarship programme, which includes funding for tuition fees and travel support. In 2024, 161 people received scholarships (30 employees and 131 children), corresponding to an investment of over 177,000 euros.

The start of the school year can be a challenge for many families when it comes to managing their budgets. With this in mind, in 2024 we continued to support the children of our employees in Portugal and Poland, particularly in the purchase of school supplies. In Portugal, we continued the Regresso às Aulas (Back to School) initiative, offering three types of support: a voucher for the purchase of school supplies at the start of the school year, support in ordering textbooks, and special support for the purchase of textbooks for large families. In Poland, school kits were distributed to the children of employees starting Year 1. Under these two initiatives, 23,416 vouchers and kits were distributed in the two countries, corresponding to an investment of over 405,000 euros.

In 2024, the Group invested more than 1.2 million euros in organising summer camps for employees' children, with educational and leisure activities. In Portugal, the summer camps were attended by 2,151 children and teenagers, and in Poland the summer camps organised by Biedronka welcomed 1,000 children of employees, aged between 8 and 13. As in previous years, Ara organised recreational activities that brought together 266 employees and 465 children during the school holidays, aimed at building children's artistic, communication, social and cognitive skills, as well as nurturing the relationship between parents and children through educational activities⁷².

Family support

The Social Emergency Fund (FES - Fundo de Emergência Social)⁷³ is an initiative created more than a decade ago in Portugal to support employees and families in times of greater vulnerability, ensuring a response to urgent situations of food shortage, domestic violence, the need for legal support, healthcare, and financial organisation, among other support, complementing the social response provided by specific government support mechanisms. We have an in-house team of social workers who carry out an individual assessment of each situation and then create personalised response plans for each employee and their family, aimed at empowering them and strengthening their autonomy. In 2024 the Jerónimo Martins Group supported 1,457 employees in Portugal through FES.

Biedronka allocates funds to respond to social requests to employees in difficult life situations, assessed by a committee responsible for managing the Social Fund, which is mandatory under Polish law. Through this

⁷² The investment in this initiative is supported by Caja de Compensacion Familiar.

⁷³ The programme was transferred to the Jerónimo Martins Foundation throughout 2024. It includes 66,907€ reported under the Mais Vida programme.

programme, 4,044 social allowances were granted in 2024. The Company also granted 6,633 loans with special conditions to employees with housing-related needs (the two Social Fund mechanisms together replace *Możesz Liczyć – You Can Count on Biedronka*).

In 2024, the two programs represented an investment of 7.9 million euros⁷⁴ in supporting employees in situations of vulnerability and social emergencies.

In addition, and to support its employees at different times throughout the year (Easter, summer holidays, the start of school, and Christmas), Biedronka distributed 25.7 million euros in electronic cards for employees to use in stores (50.1% more than the previous year).

In Colombia, Ara has three social support programmes: *Fiado*, *Payflow* and the *Fondo de Empleados* programme: *ATulado* (Employee Fund: By Your Side). *Fiado* allows employees to buy products at Ara stores on credit, deducting the amount from employee's salary at the end of the month. *Payflow* allows employees to receive advances on part of their salary, depending on the number of days worked in the month, to gradually cover their expenses. In 2024, a total of 546 employees used this programme. *Fondo de Empleados: ATulado* is an existing mechanism for large companies in Colombia, providing access to loans with lower interest rates than those charged by banks and informal markets. In 2024, the Fund financed loans granted to 3,880 employees, mainly for the purchase of motorcycles, education needs, and financial consolidation. Access to this social support programme requires employees to be members of the Fund and undergo training that gives them the knowledge they need for the sustainable use of credit. Ara also continues to provide one-off support to employees in emergency situations, whenever necessary.

We also want to be present for special moments, such as the birth of a child. To this end, the Group invested in offering welcome kits for the newborn babies of employees in Poland and Portugal, as a way of supporting 4,019 employees at this special time. This investment exceeded 407,000 euros. In Poland, the welcome kit includes essential items for the first days of a baby's life and, in Portugal, it consists in a digital gift card worth 175 euros, for use in *Pingo Doce* stores. In Portugal we also offer a course for expecting employees and/or their partners during pregnancy, in which 81 people took part, along 32 sessions.

Also on Children's Day, both in Poland and Portugal, we offer a gift to all our employees' children under the age of 12, which in 2024 were given to 59,975 children, corresponding to an investment of 436,000 euros.

At Christmas, Biedronka again offered gifts to all employees and their children up to the age of 18, customised for each age, with food and non-food products. A total of 165,330 gifts were distributed, in an investment of 8.8 million de euros (25.4% more than in the previous year). In Portugal, vouchers were offered to 13,718 of our employees' children to use in *Pingo Doce* stores, and all employees received a bottle of sparkling wine and *bolo-rei* (traditional Portuguese Christmas cake), corresponding to a total investment of over 498,000 euros.

We continue to encourage financial literacy through the *Contas Certas* (Good Money Management) programme to strengthen the financial autonomy and family management of our employees, providing access to related digital content, face-to-face training in the workplace, financial consulting and other support. In 2024, we also launched a pilot programme aimed at helping employees prepare their personal income tax returns, assisting 699 employees under the programme.

Ethics and compliance

Labour audits

[ESRS S1-1]

[GRI 408-1; 409-1; 411-1]

To prevent and mitigate the risk of labour rights violations, we ensure that frequent HR operations audits are conducted of working hours, rest periods and holidays, health assessments, workplace conditions, and other criteria, the compliance with and control of which are aimed at ensuring a dignified workplace and the wellbeing of employees. A recovery plan is defined where nonconformities are identified, closely monitored by the HR team. The subsequent audit is also brought forward, to confirm implementation of the

⁷⁴6,044,378 granted in loans to employees which are repaid to the Company.



recovery plan. In 2024, a total of 544 audits were carried out at Pingo Doce, Recheio, Jerónimo Martins Agro-alimentar (JMA), JMRS and Hussel. Given the flexibility required in the agricultural sector, we are increasingly using temporary labour and, in this regard, in addition to audits, JMA has a process in place to verify the criteria for protecting human and labour rights that it applies to its partners (in particular, the existence of workers' compensation insurance, proof of communication to Social Security, employment contracts, medical certificates, pay slips, holiday maps and work schedules).

Ara's teams also monitor a criticality map that allows them to control priority labour rights indicators (some examples of the aspects monitored by these indicators include working times, rest times, labour costs, full-time equivalent (FTEs), employee turnover, absenteeism and disciplinary proceedings and the assessment of these aspects culminates in a criticality score ranging from 1 to 5, assigned to stores, areas and managers, among others). As a result of this analysis, audits are triggered on stores with an identified risk, with 916 audits having been carried out in 2024.

Forced and child labour eradication

In the fight against forced labour and as part of The Consumer Goods Forum, we continued our involvement in the Human Rights Coalition (HRC), which is a space for dialogue that brings together companies and experts to promote human rights due diligence. To this end, in 2024 we took part in a voluntary assessment process to understand the level of maturity of our human rights due diligence process, which measured commitments and policies, governance structure, risk assessment, action planning, stakeholder engagement, grievance mechanisms and reporting channels in different dimensions, such as forced labour and occupational health and safety. The HRC also developed a publicly accessible tool with AIM-Progress and Proforest, two internationally recognised entities in the social and environmental fields, with a view to converging the duty of social and environmental vigilance.

Group-wide, we ensure the prevention and eradication of child labour by defining policies and implementing recruitment and selection procedures that prohibit the hiring of persons under the legally permitted employment age. In 2024, the Global Child Forum, which assesses the policies developed and implemented by organisations to address the impact on children's rights, ranked us as a "Leader", in first place among Portuguese companies and third worldwide in food retail, with a score of 8.5 points out of 10 possible points (4.2 points above the average of the 1,802 companies assessed).

Freedom of association and collective bargaining

[ESRS S1-8]

[GRI 2-30; 407-1]

A top concern in safeguarding our employees' rights is freedom of association and collective bargaining. Under the terms of applicable law, all employees are free to form and join organisations without the need for prior authorisation and may be represented by them when negotiating agreements with their employer. Collective bargaining, for now only applicable to Portugal, covers 98.2% of employees in the country⁷⁵, where we have 13 active collective agreements.

In the context of social dialogue, we participate in several bargaining forums with employee representation structures. In Portugal, we actively participate through sectoral employers' organisations, such as APED (Portuguese Association of Distribution Companies), and those that cut across various industries, such as CIP (Confederation of Portuguese Business). We also contribute to sectoral social dialogue at European level promoted by the European Commission, where the Group is represented through its membership of EuroCommerce. The Group has 85.9% of employees in Companies with employee representation in Portugal and 95.4% in Poland, ensuring the timely compliance, in accordance with the laws of each country, with all rules related to the right to information and/or consultation in force.

⁷⁵ Only in Portugal, since there are no collective labour regulation instruments in Poland or Colombia applicable to the Group's Companies, thus corresponding to 24.9% of the Group's total workforce.

Communication and training

[ESRS S1-1; G1-1]

[GRI 205-2]

We ensure regular communication campaigns and training to make sure that our employees are properly informed about their rights and responsibilities in complying with the ethical standards we set. As regards communication, we ensure that employees are aware of both the Code of Conduct and the Anti-Corruption Policy during onboarding. The reinforcement campaigns held throughout the year reached 42,477 employees. In terms of training, in 2024 we launched an e-learning module on the Code of Conduct in the three main countries where we do business. This training is compulsory for all employees and in future integration processes within the Group. Training on the Anti-Corruption Policy is also available to all employees.

We also regularly hold face-to-face and e-learning sessions on labour laws, which saw 11,507 employees trained in 2024.

	Code of Conduct		Anti-Corruption Policy		Labour law	
	Training volume*	Employees trained	Training volume*	Employees trained	Training volume*	Employees trained
Group	29,628	27,455	24,937	21,953	19,233	11,507
Portugal	1,943	3,650	3,247	2,765	3,218	1,161
Poland	3,236	6,019	2,134	2,932	7,486	1,833
Colombia	24,449	17,786	19,556	16,256	8,529	8,513

* Training volume = number of training hours provided multiplied by the number of participants.

Resolution mechanisms

[ESRS S1-3]

We ensure that independent whistleblowing channels are available, accessible and known to all employees. All complaints received through the existing mechanisms to report and remedy wrongdoing are duly investigated and action plans are drawn up, activated and monitored, ensuring confidentiality and the protection of whistleblowers.

The Employee Assistance Service is a dedicated service channel for employees to report, clarify and resolve labour issues. In Portugal, this channel is also used to receive and forward social requests. This channel ensures confidentiality, independence and impartiality, and safeguards employees against any retaliation, discrimination or loss of rights.

<u>Employee Assistance Service</u>	Contacts/procedures initiated			Contacts/procedures completed (%)		
	2024	2023	2022	2024	2023	2022
Group	112,653	90,809	87,325	99%	100%	98%
Portugal	43,707	22,972	37,926	100%	100%	100%
Poland*	18,432	19,537	22,280	97%	100%	97%
Colombia	50,514	48,300	28,776	99%	99%	97%

* Does not include contacts related to payroll/administrative issues and requests for Social Fund support.

In 2024, the employee assistance service in Poland (BOP) was widely publicised through communication campaigns targeting all employees to enhance awareness of the existence and functioning of the channel, and of the role it plays in protecting employees' human and labour rights. These campaigns reached more than 6,000 visualisations by Biedronka and Hebe employees.

The Ethics Committee is an independent body tasked with monitoring disclosure of and compliance with the standards and principles of the Code of Conduct and Anti-Corruption Policy. It has its own dedicated

[website](#) that allows employees, as well as any interested party with whom our Companies work or interact, including workers who are not employees, to confidentially report any instance of non-compliance with or violation of the law, internal policies or principles, in particular related to assault, harassment, conflicts of interest, corruption, discrimination, fraud, improper business practices or the misuse of information, among other wrongdoing.

In addition to the four Ethics Offices in Portugal, in 2024 two offices were opened in Poland and one in Slovakia. These are independent reporting channels which, together with the Ethics Committee, are responsible for ensuring the receipt and follow-up of reports of any wrongdoing related to the Companies, consistent with the violation of Union law, national law and the Code of Conduct. The Ethics Committee and Ethics Offices follow the principles of independence, impartiality, integrity, confidentiality and absence of conflicts of interest, and have a platform for managing reports of wrongdoing pursuant to law.

Moreover, in Poland an Anti-Mobbing, Anti-Discrimination and Sexual Harassment Committee is formed whenever a complaint involving these matters is reported, which is responsible for following the complaints and formulating an action plan. In Colombia, the Committee for Labour Co-existence manages complaints relating to working conditions or other work-related problems.

All situations reported via any of these channels are analysed and investigated, and action plans are drawn up for the resolution thereof whenever necessary. In 2024 we received 3,580 labour-related complaints, of which 100% were analysed, 85.4% were closed and 51.9% required remedy actions.

<u>Labour-related complaints</u>	Total number	% of complaints received
Complaints received*	3,580	-
Complaints reviewed**	3,580	100.0%
Complaints with the need for remedy actions***	1,826	51.9%
Complaints closed (analysis concluded without need for action or analysis concluded with the implementation of the needed actions)****	3,059	85.4%

*Number of complaints made by employees through the Ethics Committee, Ethics Offices and the Employee Assistance Service.

**Number of complaints analysed by resolution mechanisms out of the total number of complaints received.

***Number of complaints whose conclusion within the scope of the analysis resulted in the need to implement remediation actions out of the total number of complaints received.

****Number of complaints considered closed by 31/Dec/2024 after the appropriate analysis, out of the total complaints received.

[ESRS S1-1; S1-17]

[GRI 406-1]

Among the received labour complaints, in 2024 a total of 136 complaints involving discrimination, including harassment, were reported and responded to through our resolution mechanisms. No incidents of forced labour, human trafficking or child labour were identified.

<u>Complaints involving discrimination</u> *	Total number	% of complaints received
Complaints involving discrimination received	136	-
Complaints involving discrimination analysed**	136	100.0%
Complaints involving discrimination with the need for remedy actions***	73	53.7%
Complaints involving discrimination closed (analysis concluded without need for action or analysis concluded with the implementation of the needed actions)****	126	92.6%

*In terms of the potential total amount of fines, pecuniary penalties and compensation for damages as a result of the aforementioned cases, the architecture necessary for this reporting is under development. The Group will take the necessary steps to report these potential indicators. Information on contingent liabilities considered to be material associated with ongoing proceedings is described in note 23. "Contingencies, contingent assets and contingent liabilities" in Chapter 3. "Financial Statements".

**Number of complaints involving discrimination and harassment investigated by the resolution mechanisms, out of the total complaints involving discrimination and harassment received.

***Number of complaints involving discrimination and harassment closed that led to the implementation of remedy actions, out of the total complaints involving discrimination and harassment received.

****Number of complaints involving discrimination and harassment considered closed by 31-12-2024 after the appropriate investigation, out of the total complaints involving discrimination and harassment received.

More information on our communication channels with internal and external stakeholders is provided in section 2.3 "Stakeholder engagement and communication channels" of subchapter 2. "General disclosures".

Innovative technologies



The adoption of new technologies and digital transformation is fraught with challenges, but also opportunities and the Group recognises that investing in innovative solutions not only boosts the efficiency of our HR management processes, but also strengthens interaction and communication with our employees.

The Companies have focused on preparing our people for an increasingly digital reality, particularly through training. One example is the global Digital Executive Education Programme (DEEP), in partnership with the Nova School of Business and Economics, the aim of which, since 2017, is to prepare our leaders to spearhead the digital transformation of our businesses through the development of key skills. To date, 190 employees have received training through DEEP.

In 2024 we also started an artificial intelligence (AI) training pilot project – Blow your Mind. This programme, which started by impacting 60 employees, aims to expand the use of AI in the Group, as it can leverage creative, innovative and efficient solutions to respond to the day-to-day challenges our Companies face.

People management solutions

The Hello JM project, focusing on the Group-wide implementation of a cutting-edge technological solution, aims to centralise and simplify internal HR processes. A significant milestone was reached in 2024 with the go-live of the first phase (Employee Central and Recruitment and Onboarding modules) in Portugal and Slovakia.

At the end of 2024, there were 62,747 active users (employees who logged in at least once in December 2024). The scale of implementation was recognised with the SAP SuccessFactors People Champion 2024 award.

Communication channels

We have internal communication channels that connect our more than 139,000 employees worldwide (Our JM) and locally (such as Por Nós in Portugal, Dla Nas in Poland, and Hablando Naranja in Colombia). In 2024, the four platforms saw 54.4 million visits. Hello JM also works as an internal communication channel for all employees in Portugal, Poland, Colombia and Slovakia.

Biedronka's Dla Nas platform also has a chatbot and voicebot, aimed at ensuring agility and efficiency in responding to requests and clarifying HR processes, including social requests. In 2024, new features were introduced on the Intranet and in these AI tools, such as the ability for employees to submit complaints and make suggestions, and a discounts and protocols page. The chatbot and voicebot responded to 326,057 requests without the need for human interaction.

Radio Pingo Doce and Ara's Hablando Naranja radio station continue to be an important resource for sharing information about the business in stores, with a total of 39 broadcasts in 2024.

Commitments

[ESRS 2 MDR-T; ESRS S1-5]



The Group's commitments related to this topic can be found in subchapter 6. "Sustainability commitments", of this chapter.

4.2.2. Affected communities

[ESRS 2 SBM-3]

Dialogue with and support for the communities surrounding our operations (stores, distribution centres and other operating facilities) are material to our actions as a responsible organisation, as we already carry out supply chain due diligence through the principles established in our Sustainable Sourcing Policy, the Code of Conduct for Suppliers and other sustainability-related practices, such as fighting deforestation, carrying

out social and environmental audits of suppliers, and the sale of certified-sustainable products, actions which we detail throughout this chapter.

Not only do we seek to understand the needs of surrounding communities we support through dialogue mechanisms, but we also measure the impact of our direct and indirect support on the charities and their beneficiaries in order to enhance and expand the positive benefits to society. We have also set targets and objectives to better and more broadly measure our social impact.

The strategy of building close ties with local communities and supporting the most vulnerable population groups exposed to socio-economic risks, is carried out through associations and charities, among other social welfare organisations. In line with the local before global principle, the Group supports projects and initiatives that have a positive impact on the quality of life of communities, and the preservation and dissemination of the cultural heritage of the countries where it has operations.



How we dialogue with affected communities

[ESRS S3-2, ESRS 2 MDR-M]

[GRI 3-3, GRI 2-12, GRI 2-29, GRI 413-1]

Our constant involvement in supporting surrounding communities gives us a real and accurate understanding of the evolution of the communities' social problems and the needs of the beneficiaries, most of whom are part of groups at risk of social exclusion and marginalisation. This dialogue, where we essentially listen to the views of those who are on the ground on a daily basis, shapes our support strategy in order to maximise the impact on communities through our products and activities.

Dialogue with legitimate representatives of the communities in which we have operations takes place in different ways. In the case of organisations with protocols established with the Holding Company, annual visits are conducted of their facilities for onsite assessment of the quality of the infrastructures and the service provided to the people they support. This dialogue is scheduled annually and also whenever deemed necessary, by e-mail or phone.

In Portugal, Pingo Doce has designed a survey for the institutions it supports to understand their needs and invite them to participate in an in-store campaign to recruit volunteers, to be held in due course. In 2024, and as part of the "Alimenta o Bairro" (Feeding the Neighbourhood) project, Pingo Doce held a series of workshops to better understand the institutions' opinion of the Company's support procedures, the foodstuffs most appreciated and needed, their ability to collect the products at stores, and how to address identified areas for improvement.

In Colombia, Ara assesses the most material social indicators in the country, such as monetary poverty, multidimensional poverty, food insecurity, and malnutrition, in order to channel its efforts towards the challenges identified. Before implementing concrete projects, Ara selects and collaborates with stakeholders, opinion leaders and NGOs recognised for their work in the fields identified (e.g., UNICEF, the Colombian Institute of Family Welfare, secretariats for social integration, and food bank associations), recognising that these partnerships are crucial for leveraging knowledge and resources and thus designing impactful solutions. Ara also frequently consults its stores' surrounding communities to identify and plan local interventions, incorporating the expectations of these stakeholders into its decision-making processes wherever possible. This process is the basis for the creation of the "1 Millón de Razones" (One Million Reasons) project.

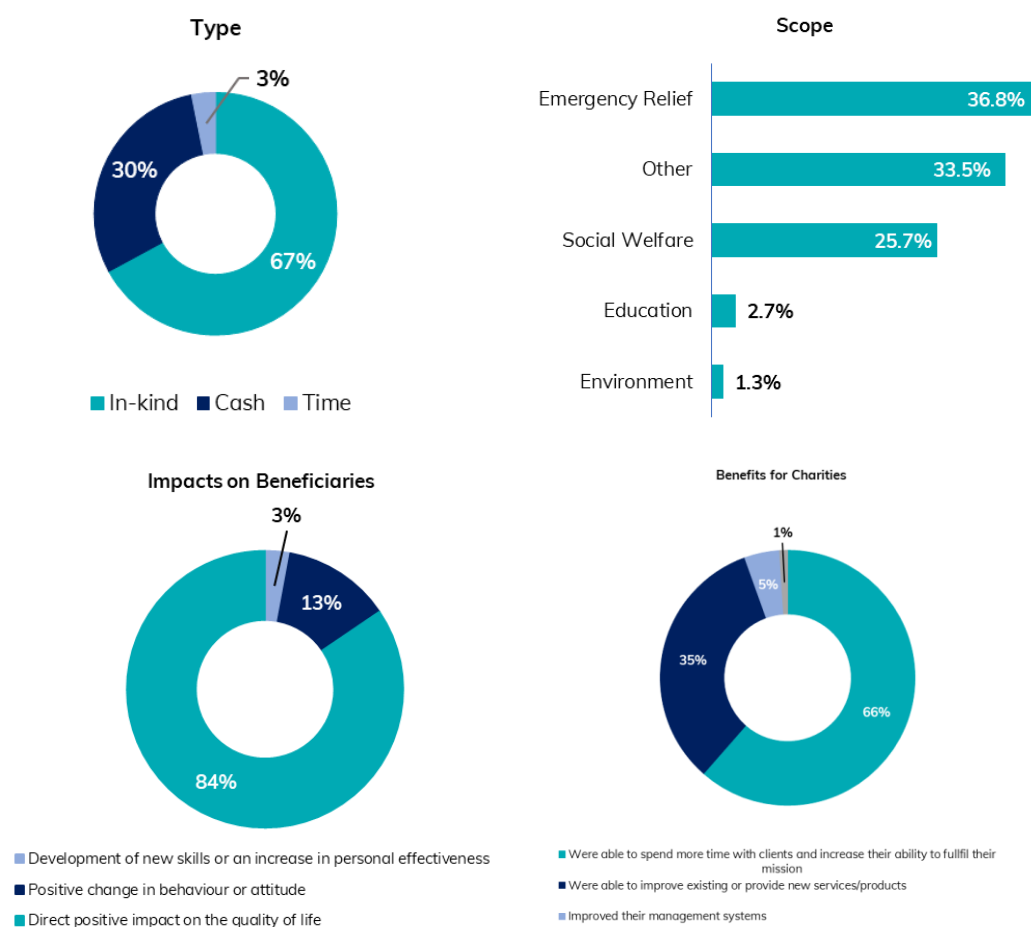
Given our international presence and the diversity of our activities, there are several people responsible for engaging in dialogue with the social organisations we support⁷⁶. These include the Environmental Protection and Sustainable Development Director of Biedronka, the Corporate Events and Social Investment Senior Manager of the Group's Holding Company, the External Communication and Social Responsibility of Ara and the Director of Sustainable Development and Local Impact at Pingo Doce, who manages the Local Impact and Development area. In other Companies, the dialogue and engagement with the organisations supported, is done through the managers of these projects in the Companies, which is why they are not listed.

⁷⁶ More detailed information about those responsible for stakeholder engagement is provided in subchapter 2. "General disclosures", section 5.2.2. "Governance and strategy".

The Business for Societal Impact (B4SI) methodology, which we use to measure social impact, involves an annual survey of the organisations we support to understand the ways the support provided is allocated and the different types of impact on the beneficiaries and community organisations. The survey has an open-ended response field which institutions can use to submit additional needs to be passed on to the Group or its Companies.

The B4SI methodology criteria are applied to each of the institutions to which we donate more than six thousand euros. We also use this methodology to evaluate our training programmes for people in situations of social vulnerability (people with disabilities or who are unemployed, for example), in order to strengthen their ability to integrate into the labour market.

In 2024, we estimate that the nearly 79.6 million euros⁷⁷ allocated to 515 organisations positively impacted around 2.3 million people. Support was mostly in the form of in-kind donations and directed towards addressing social emergency situations.



As in previous years, the majority of beneficiaries (84%) surveyed by the institutions that support people in vulnerable situations reported positive impacts in their quality of life. These institutions also report that the support received has enabled them to offer more to their beneficiaries and improve the fulfilment of their mission.

Another indicator we use to measure our social impact is the support our employees provide to beneficiaries of institutions that help people in vulnerable situations (e.g. unemployment or disability). In 2024, a total of 271 of our employees in Portugal and Poland took part in professional on-the-job training

⁷⁷ This figure corresponds to the activities/projects measured with the institutions and their beneficiaries supported by the different Companies of the Group, and there is a minimum threshold at which significant social impact data can be obtained. Therefore, it does not represent the total amount of support granted by Jerónimo Martins. This figure includes support to organisations that develop projects with vulnerable populations, the value of which is a contribution and not a donation.

programmes, corresponding to more than 65,000 hours of tutoring which are the equivalent of an investment of more than 2.5 million euros⁷⁸.

To ensure community engagement, we have established communication channels for open dialogue and to better understand the challenges local communities face. Outreach mechanisms and interpersonal relations are particularly noteworthy, such as face-to-face meetings and conferences with the organisations and remote communication tools, including a tool that forwards requests for support sent by e-mail to the Sustainability Departments of the Companies and the Holding Company. Contact points are available at regional centres, distribution centres and stores.

Our Whistleblowing Policy ensures confidentiality and non-retaliation against anyone who submits a report through the communication channels made available by the Group. More detailed information about the communication channels available within the Group is provided in subchapter 2. "General disclosures", section 2.3. "Stakeholder engagement and communication channels", of this chapter.

Direct support for surrounding communities

[ESRS S3-4, ESRS 2 MDR-A, ESRS 2 MDR-M]
[GRI 3-3, GRI 203-1, GRI 413-1]



The first and most significant way in which we provide support for surrounding communities is through monetary and food donations. In 2024, we provided over 81 million euros in direct support to more than 2,100 organisations. The reduction of around 7% is mainly due to the increase in the number of heavily discounted end-of-life sales programmes and the greater efficiency of our business in managing food shortages. This figure does not include the 40 million euro attributed to the Jerónimo Martins Foundation. Jerónimo Martins' statutes foresee that future allocations will stem from the application of its results, to be approved at the Annual General Meeting. The activities and financial reporting of the Jerónimo Martins Foundation are independent of Jerónimo Martins SGPS, S.A. and the Companies that make up the Jerónimo Martins Group.

Direct support (euros)

Companies	2024	2023	Δ 2024/2023
Biedronka*	55,598,187	63,972,697	-13.1%
Hebe	78,212	**30,265	+158.4%
Holding (JMH)	3,386,594	2,904,975	+16.6%
Pingo Doce	18,302,480	17,193,702	+6.4%
Lidosol	1,021,082	937,331	+8.9%
Recheio Cash & Carry	720,504	825,042	-12.7%
Recheio Masterchef	303,613	299,485	+1.4%
João Gomes Camacho	32,867	8,198	+300.9%
Jeronymo and Hussel	11,354	13,282	-14.5%
Jerónimo Martins Agro-Alimentar	20,826	23,125	-9.9%
Ara***	1,612,541	863,773	+86.7%
Total	81,088,260	87,071,874	-6.9%

* Includes the monetary contribution to the Biedronka Foundation, amounting to more than 20 million euros, resulting from the appropriation of the net profit of the founding company, Jeronimo Martins Polska (Biedronka), approved by the General Meeting. The activities and financial reporting of the Biedronka Foundation are independent from Biedronka.

** Corrected figure compared to 2023, as a result of improvements in the data collection process.

***Includes Ara and Bodega Del Canasto.

The surplus food that can no longer be sold, but which meets food safety standards, are donated to social welfare institutions, who guarantee that it reaches people in situations of social and economic

⁷⁸ For more details on mentoring and professional training, see subchapter 4. 'Social information', section 4.2. "How we manage social topics", subsection 4.2.1. "Own workforce", point "Diversity and inclusion", sub-point "Inclusion of minorities".

vulnerability. This practice, which is material in our entire value chain, enables products to fulfil their primary mission: to feed people.

In 2024 we donated around 18,600 tonnes of food, 3.4% less than in 2023. This decrease is explained by the growth of the sales programme offering significant discounts on end-of-life products at Biedronka and by changes made to the procedures for managing food loss, particularly at Ara.

Food donations (tonnes)*

Companies	2024	2023	Δ 2024/2023
Biedronka	10,776	13,004	-17.1%
Pingo Doce	7,162	**5,299	+35.2%
Recheio	351	332	+5.7%
Ara	317	625	-49.3%
Total	18,606	19,260	-3.4%

* Values calculated internally in accordance with proxies resulting from implementing the Food Loss and Waste Protocol, a methodology devised by the World Resources Institute and various stakeholders to consistently calculate and report food waste and loss in the supply chain.

** Corrected figure compared to 2023, as a result of improvements in the data collection process.

Corporate areas

The Group's Holding Company provided support to over 70 organisations, totalling around 3.4 million euros, to which it should be summed the monetary attribution to the Jerónimo Martins Foundation, of 40 million euros. Most of these organisations (60%) focus on social work. We continue to provide regular support to 20 of these institutions, most of which we have supported for more than a decade.

The following support provided is worthy of note:

- We are one of the main sponsors of the construction of the Clínica do Gil (Gil Clinic), the Gil Foundation's latest project, to give children and young people from disadvantaged socio-economic backgrounds access to healthcare and specialised support from therapists who specialise in school and social integration. We are committed to continuing to support this initiative in the coming years by awarding scholarships.
- As part of its exercise of citizenship and within the framework of the support granted for the conservation of the cultural heritage of the countries in which we operate, we contributed towards the construction of the future Museum of Independence, by the Historical Society of the Independence of Portugal, and to the installation of a statue of Marie Skłodowska-Curie in Portugal to commemorate the 90th anniversary of her death.

The Jerónimo Martins Foundation

Established in March 2024 and recognized by a decree from the President of the Council of Ministers in September of the same year, the Jerónimo Martins Foundation was born as a natural step in the legacy of the heavily humanist nature of the Jerónimo Martins Group, aiming to exponentially multiply its social impact.

The Foundation has an initial budget of 40 million euros to allocate to its three areas of activity:

- social emergency, to effectively and properly respond to emergency situations and to accompany families, anticipating and empowering them to manage future challenges;
- health, by facilitating access to different types of healthcare, teaching healthier lifestyle habits, and preventing and diagnosing potential illnesses;
- education, by enabling access to quality education services at all stages of learning and supporting parents in family management, empowering them and connecting them to the support network they need to be able to look after their children.

These areas of action were defined with the Group's employees and their families in mind, as well as the wider community.

Biedronka

Biedronka channeled 55.6 million euros to support social campaigns and social projects⁷⁹, 13% less compared to 2023. More than 650 institutions received in-kind donations and monetary support.

Over 10,700 tonnes of surplus food was donated, 17% less than in 2023, due to the success of the programme to encourage consumers to buy end-of-life products and collaboration with the Too Good To Go platform.

There were 2,345 stores (more than 63% of total stores) contributing to these donations. Among the 152 organisations that benefited from donations of surplus food, the Federation of Polish Food Banks was the most significant.

In September 2024, the Company immediately mobilised its efforts to provide water, food and other essential goods to displaced people and other victims of the floods that affected Central and Eastern Europe.

The stores held fundraising campaigns to support the Polish Red Cross and the Wiosna Association, two institutions with which Biedronka regularly contributes and which were on the front line supporting the victims. More than 585,000 euros were raised from customers, which was used to buy household appliances, building materials, dehumidifiers and heaters, and to organise the work of the volunteers who provided support to the affected families, including hot meals.

Over two weekends in September, some stores collected basic goods to help people in the areas affected by the floods. On the weekend of 20 and 21 September, in collaboration with the Polish Red Cross, more than 70 pallets of essential goods were collected by 737 Biedronka stores located on the regions most affected by the floods. The following weekend, 27 and 28 September and in collaboration with Caritas, 85 tonnes of non-perishable food and household cleaning products were collected from 477 stores.

The Company also gave the more than 500 employees affected by the floods an additional payment of 350 euros to help them.

Hebe

Hebe's responsibility strategy is essentially based on supporting young women by promoting women's entrepreneurship and supporting those living in orphanages as they transition to a more independent life.

The Company provided direct support to nine organisations in 2024, corresponding to over 78,000 euros, more than double that in 2023. This increased support asserts Hebe as a partner of institutions that promote the integration of young people from disadvantaged backgrounds into society and the labour market.

Pingo Doce

In 2024, the Company responded to the request of around 1,350 social charities⁸⁰ operating in the surrounding areas of its stores. Food donations and monetary support (which includes fixed support, gift cards and the sponsorship of environmental conservation projects) exceeded 19.3 million euros⁸¹, 6.6% more than in 2023.

A total of 7,162 tonnes of surplus food from stores were donated, 35% more than in 2023, due to the implementation of the “Alimenta o Bairro” (Feeding the Neighbourhood) project.

⁷⁹ Biedronka's annual responsibility reports are available at csr.biedronka.pl/.

⁸⁰ Pingo Doce's Responsibility Policy is available at www.pingodoce.pt/responsabilidade.

⁸¹ Includes Lidosol.

Pingo Doce "Alimenta o Bairro"

The "Alimenta o Bairro" (Feeding the Neighbourhood) project reinforces the active role everyone plays in fighting hunger in the neighbourhoods of which Pingo Doce is a part and, at the same time, reduces food waste in the stores. We will continue to increase the number of products that can be donated under the Company's surplus food donation programme through this project, by including additional product categories (in 2024 packaged meat, cold meats and products from the takeaway counter and from restaurants and coffee shops were introduced).

"Feeding the Neighbourhood" stems from a survey of 34 institutions to understand what types of products are most appreciated and their capacity to collect surplus food from stores. They were also asked for their opinion on the procedures for collecting surplus food, aimed at facilitating and aligning the Company's strategy.

Changes were subsequently made to the procedures associated with this process:

- a new tool was introduced for communicating and managing donations and collections by the institutions, so that store teams can better plan, manage and measure the impact of the donations they make;
- the dematerialisation of transport documents, which are now in digital format;
- the definition of a standard surplus collection model with predefined collection times for each store.

Pingo Doce also implemented a training and capacity-building programme for institutions on food safety and organisational management, with practical tips for managing human resources and volunteers, stocks and their budget, and for optimising donations.

The programme began with a pilot in four stores and by the end of 2024 had been implemented in around 200 stores.

Bairro Feliz (Happy Neighbourhood) is a programme that provides financial support to the causes proposed by the entities and residents of the neighbourhoods where Pingo Doce stores are located, donating up to one thousand euros to implement the ideas most voted for by customers.

In the 2024 edition, the fourth nationwide and marking the fifth year of the project, a total of 2,700 proposals were received from social organisations (9% proposed by neighbourhood groups). After the public vote, Pingo Doce awarded more than 429,000 euros to the 459 projects selected by customers, 31% of which were destined to schools and education projects. It is estimated that more than 11.000 seniors and 19.000 children have been impacted by the winning 2024 Happy Neighbourhood projects. Since 2019, the programme has supported around 1,950 causes with 1.86 million euros, having received 11,000 entries and 92.5 million votes.

In force since December 2022, Pingo Doce has a cooperation agreement with the National Republican Guard (GNR) aimed at carrying out joint outreach and support actions and initiatives for the elderly, children and young people in need. Under this partnership, in 2024 more than 9.000 baskets containing food, hygiene products and blankets were delivered to 1,800 elderly people. In addition, five Christmas lunches were organised in the five districts most affected by loneliness among the elderly, with the participation of more than 500 elderly people and the involvement of the GNR's local territorial commands and Pingo Doce's operational teams.

Recheio

The Company donated over one million euros⁸² in in-kind and monetary support, around 7% less than in 2023. Recheio provided support to 212 organisations, 31 more than in the previous year, as a result of an increased focus on aligning donations with the Company's priorities.

Surplus food donations increased nearly 6% to 351 tonnes, due to an increase in the number of products that can be donated and in communication with the organisations that collect the food from stores. These efforts will be developed and improved in 2025, including the incorporation of Pingo Doce's principles and lessons learnt from the "Alimenta o Bairro" project.

Jerónimo Martins Agro-Alimentar

The various JMA companies allocated over 20,800 euros in support to ten social charities located in the areas surrounding their production units, particularly in the region of Portalegre (Alto Alentejo, close to the Spanish border), where the Terra Alegre dairy factory is located.

⁸² Includes Recheio Masterchef and João Gomes Camacho.

Ara

Our Companies in Colombia provided support in the amount of around 1.6 million euros to 23 organisations for social support projects, 87% more than in 2023. This increase, which is part of the Company's 2024-2026 objectives, reflects Ara's commitment to being the main ally of the communities surrounding its stores, as one in every three people in Colombia live in poverty (17 million people have a monthly income of less than 100 euros).

This support is provided primarily through the "1 Millón de Razones" (One Million Reasons) project, a unique social investment in the country aimed at supporting more than 60,000 people in 90 municipalities with one million euros, especially children, young people and mothers.

The volume of food donations decreased to 317 tonnes due to changes in the control of ready-to-donate products and a decline in the number of organizations that usually pick up food from stores. These are aspects that the company is reviewing in an effort to improve. Institutions such as Caritas Colombia and [Fundación Alimentar Colombia](#) (Feed Colombia Foundation), working to eradicate child malnutrition in the country, received most of the surplus food donated by 273 stores (19% of the total).

One Million Reasons

In Ara, the Group's social investment aims at supporting a wide range of projects designed to meet the most urgent needs in Colombia's poorest regions. The initiatives include programmes to reduce malnutrition and child malnutrition, improve the living conditions of vulnerable populations, and enhance education as a key tool for social change, in close alignment with Ara's strategy of supporting surrounding communities.

Some of the projects in this programme include:

- the construction of the first food bank in the Pacific region, in Buenaventura, one of the areas with the highest levels of poverty and food insecurity in the country;
- the development of "Desayunos Saludables" (Healthy Breakfasts), in partnership with ABACO, the Food Bank Association of Colombia (which brings together 24 food banks and which Ara has supported since its inception in 2013), to help provide 20% of the recommended daily nutritional needs of more than 4,250 children by delivering breakfast packs. In 2024, 19.5 tonnes of food was donated under this programme;
- the partnership with UNICEF for the "Niños del Futuro" (Children of the Future) project in San Andrés, aimed at reversing the trend seen in 2023 where half of all school-age children were not enrolled in national education systems; the support provided was used to improve school facilities and shared community spaces;
- the partnership with ICBF, the Colombian Institute of Family Welfare, under the "Madres Comunitarias" (Community Mothers) project, to provide support in the form of gift cards that can be exchanged for food to 3,000 community mothers and fathers in 46 Colombian municipalities, where action is needed to promote healthy eating habits and provide food security; kits were also distributed to 1,500 community mothers to support them in learning about healthy eating and nutrition, including a tape to measure the upper arm circumference of children, enabling early identification of cases of child malnutrition.

The programme won an award from *Portafolio* newspaper in the 'social responsibility' category will see its investment doubled in 2025, to 2 million euros.

Programmes and projects to engage and support affected communities

[ESRS 2 S3-4, ESRS 2 MDR-A, ESRS 2 MDR-M]
[GRI 3-3, GRI 203-1, GRI 413-1]



We establish partnerships with different institutions to identify and respond to social cohesion challenges in areas such as healthy eating, promoting reading habits, social inclusion and environmental awareness. Besides concrete projects, we also take part in corporate volunteering initiatives.

Healthy eating habits and lifestyles

Since 2016, and in Portugal, we have sponsored the Eco-Schools [Alimentação Saudável e Sustentável](#) (Healthy and Sustainable Food) programme, promoted by the Blue Flag Association for the Environment and Education (ABAAE – Associação Bandeira Azul de Ambiente e Educação). In 2024, our support for this

programme, which raises awareness among students of issues such as eating habits, nutrition and the sustainability of agrifood production, amounted to around 32,000 euros. In the 2023/2024 edition, 359 entries were submitted by 357 schools from across the country. The works submitted tackled challenges such as:

- making people aware of the importance of more sustainable food choices, prioritising the consumption of seasonal and, where possible, organically grown local fruit and vegetables;
- involving families and guardians in the search for traditional Portuguese recipes to prove that Mediterranean ancestral recipes are rich in local ingredients, frugal, bring the family together around the table, and are the most sustainable;
- monitoring and recording behaviour in school canteens, and ensuring and promoting the adoption of good eating, hygiene and health habits, encouraging a reduction of food waste and noise in canteens and cafeterias;
- encouraging students to research and investigate the harmful effects of food additives and sugar in foods that children and young people regularly eat;
- promoting the Mediterranean diet through artistic and digital expression;
- creating and preparing complete menus, using local and seasonal ingredients, inspired by the Mediterranean diet and that can be implemented in school canteens.

Biedronka was once again the main sponsor of the Olimpiada Zdrowia PCK z Biedronką (Polish Red Cross and Biedronka Health Olympics), a competition that promotes healthy eating habits and lifestyles among schoolchildren consisting of a test on nutrition, health and ecology. After completing secondary school, the winners will be able to study at the nutrition faculties of the Medical University of Lodz or the University of Opole, both of which are honorary sponsors of the initiative.

Biedronka provides two types of support: financial support for the winners, including specific prizes awarded to the best works on healthy eating habits and healthy living in the local community, and consultancy support provided by the Company's experts in quality and Private Brand, environment and sustainability. These Biedronka personnel are involved in designing questions and are jury members. In 2024, the Company channelled more than 51,000 euros to this project.

The 31st edition saw over 16,000 students compete, with 32 students taking part in the final in May 2024. Biedronka awarded eight special prizes in the two age groups of the competition in the form of gift cards worth over 900 euros. The 32nd edition of the competition was launched in November, with 21,980 students from 1,295 Polish schools taking part, focused on issues related to alternative diets and the role of sport in developing healthy habits.

Hebe also focuses its activities on supporting health-related causes, in particular common health diseases in women. In-kind and monetary support totalling over 110,000 euros was used to (i) support the organisation of and provide participation kits for the "Bieg Kobiet Zawsze Pier(w)si" run, aimed at raising awareness of breast and cervical cancer prevention, (ii) award prizes for the winners of the "Stowarzyszenie Sportowe Ich Własna" football league championship, and (iii) provide gifts for the participants of the festival organised by the Cancer Surgery Clinic of the Medical University of Lublin, aimed at providing medical tests, consultations, and awareness-raising workshops on breast cancer prevention.

Ara teamed up with three institutions (Fundación Leicy Santos, Fundación Manuela Vanegas and Fundación La Quinta.com) that promote sport, particularly football, as a healthy habit in vulnerable areas, involving 260 children from the Quibdó, Copacabana and Lorica regions. A total of 15.5 tonnes of food was donated.

Promoting literature and reading habits

Promoting family reading habits from an early age is a way of developing children's literacy and contributing to more informed and prepared societies. To this end, and besides selling books at affordable prices, Pingo Doce and Biedronka also hold children's literature competitions. The winners of the two stages of the competition – writing and illustration – are guaranteed publication of their book, sold exclusively in each of the banners' stores. Each winner in each of the stages, both in Portugal and in Poland, receives a monetary prize of 25,000 euros.

In 2024, a total of 1,416 entries for the writing stage and 186 for the illustration stage were received in the 11th edition of the [Pingo Doce Children's Literature Prize](#), the first to promote only already published authors. 1,400 copies of *Eu e o segredo do Faraó* (Me and the Pharaoh's Secret), by Catarina Fonseca (text) and Mané Peixoto (illustration), were sold in 2024. The Pingo Doce Children's Literature Prize is the largest national children's literature prize, having already revealed 22 new talents and recognised two published authors.

[Piórko](#) (Biedronka Children's Literature Prize) has been sponsored by the Polish Children's Ombudsman since the first edition. The 10th edition received over 2,130 entries in the writing stage, with *Moje Czarne Szczęście* (My Black Happiness), by Agnieszka Piwoń, winning the competition and inspiring the more than 760 illustrators who submitted entries for the second stage, won by Dorota Zak. Since launch of the initiative in 2015, more than 580,000 copies of the ten winning books have been sold, with over 16,000 copies of the winning book in the 2024 edition sold in the year.

In Portugal, Pingo Doce was present at six book fairs in Portugal and launched 37 new exclusive titles (in line with the National Reading Plan), which it offered for sale in its stores at affordable prices. At these fairs, open to the general public and children, exclusive children's books were sold and reading, and autograph sessions were held with the winners of the Pingo Doce Children's Literature Prize. To reassert itself in the ecosystem for promoting reading and children's literature, Pingo Doce installed libraries with children's books in children's hospitals and inpatient wards across the country. Each library contains 30 exclusive Pingo Doce children's books for children between the ages of 2 and 12. Several book houses are installed in each children's ward, depending on the size of the inpatient ward, creating "Reading Neighbourhoods". In 2024, a total of 72 book houses were delivered to 26 hospitals and over 2,600 books were donated.

Social inclusion and entrepreneurship

Most notably among the continued support provided is the investment of 75,000 euros in scholarships to students in Portuguese schools from disadvantaged socioeconomic backgrounds, supported by EPIS – *Empresários pela Inclusão Social* (Businessmen for Social Inclusion), an organisation we have supported since its establishment in 2006.

Scholarships to transform lives

Many students in vulnerable situations are unable to complete their studies. EPIS runs several support programmes specifically to promote school success and the integration of these young people into society. This association was formed in 2006 to fight early school leaving and underachievement. It focuses its efforts on children and young people between the ages of 3 and 18, promoting the development of skills, academic progress and entry into the labour market.

To achieve its social inclusion goals in Portugal, EPIS relies on the support of social investors and individual donors. The Jerónimo Martins Group, a founding member of EPIS and one of the association's main social investors, supports the "Sustainability and Active Citizenship" category, which, since 2020, has distinguished school projects that raise awareness and change behaviour relating to healthy eating, the environment and community support.

In 2024, five scholarships were awarded to students and their upper secondary education schools in recognition of the merit and feasibility of projects to raise awareness, mobilise and transform behaviour and practices, at school and/or in the education communities, in line with the United Nations Sustainable Development Goals and the Jerónimo Martins Group's strategic sustainability pillars. In total, we have awarded 26 scholarships to support school projects.

Since 2023, we have also been awarding academic merit scholarships in the special "Jerónimo Martins Scholarships" category, aimed at supporting students who achieved good results in their secondary education, bachelor's and master's degrees, and wish to continue their studies. After the 14 students supported in 2023, a further 14 scholarships were awarded in the 2024 edition.

Biedronka has been the main sponsor of the *Nadzieja Na Mundial* Association (Hope for Mundial) since 2018. The association supports the development of children in institutions, helping them to socialise through sport and holding football tournaments with other children and young people from Poland, other European countries and the rest of the world.

The 15th edition of the Polish championship was held in 2024, with 400 boys and girls from all over Poland coming to play in Warsaw. The best players were called up to play for the Polish national team in the 9th

edition of the world championship, which brought together teams from 27 countries, including Portugal. Biedronka invested more than 174,000 euros in the two initiatives.

To celebrate births in Poland, since 2021 Biedronka has offered packs of products to children born in the country and registered on the Dada Club [website](#) (the Company's Private Brand range of hygiene and childcare products and market leader in the nappy segment). In 2024, over 38,000 packs were offered, which totalled 275,000 kits already distributed, which include nappies, food jars, wipes and cotton buds.

To help and support the integration of people with disabilities, in 2024 Biedronka donated more than 116,000 euros to the Podaj Dalej Foundation, an organisation whose mission is to help people with disabilities achieve independence and live active and happy lives. The Foundation organised several initiatives thanks to the support provided by Biedronka:

- art and sports camps for around 20 disabled children from various parts of Poland;
- a Youth Academy, which held several workshops for young people with disabilities, focusing on self-acceptance, discovering relationships, talents, and basic meals. Five young people aged 17 to 21 participated in the Youth Academy;
- workshops for 22 parents of children with disabilities on strengthening mechanisms, empowerment, relaxation and eating habits adapted to their children;
- presentation of a series of adventure stories about Ibisek the Fox, who befriends Ladybird (symbol of Biedronka), as a means to promote equality and friendship beyond differences.

In 2021, Biedronka was the first retailer in Poland to launch a programme dedicated to fighting period poverty⁸³, "Juntos Vamos Começar um Período de Mudança" (Together We'll Start a Period of Change), in partnership with the Kulczyk Foundation. After the collaboration agreement ended in 2023, the Company continued to contribute to this cause through the "Action Menstruation in Your School" campaign, maintaining its collaboration with the Kulczyk Foundation. During the 2024/2025 academic year, Biedronka provided support to around 590 schools by offering more than 53,000 packs of tampons and sanitary pads, in an investment of 50,000 euros, impacting a total of 112,000 students.

Hebe continued its involvement in the initiative "Odkryj Siebie Z Hebe" (Discover yourself with Hebe), in partnership with the One Day Foundation, aimed at promoting the social and professional inclusion of young adults who enter working life after ageing out of orphanages. The 33 participants worked in 32 Hebe stores for two months⁸⁴ in the third edition of the programme. Hebe donated over 23,000 euros to support the Foundation in pursuing its social support objectives. In 2024, Biedronka joined this collaboration through the Dobry start z Biedronką (Good start with Biedronka) initiative.

Hebe also donated nearly 8,000 euros to the third edition of the [TOP Women in e-business](#) programme created by [Fundacja Kobiety E-Biznesu](#) (Foundation for Women in E-Business), the main goal of which is to support the establishment of online businesses run by women.

Ara maintained the support programme for low-income mothers with the distribution of welcome kits for the babies born in hospitals with the highest birth rates. More than 30,000 kits were offered containing nappies, shampoo, soaps and other essential products from the Bubu Private Brand range specialising in baby care, and also a micellar water and sanitary pads for the mothers. The initial aim of this project in 2023 was to support 1,500 families, a figure that was far exceeded in 2024.

To celebrate International Grandparents' Day (26 July), Hussel teamed up with the "A Avó veio trabalhar" (Grandma came to work) association, inviting grandmothers to spend a morning in one of the Company's stores.

Environmental education

Aware that environmental education and awareness play a vital role in driving positive behavioural change, encouraging more sustainable practices and the conservation of resources, we developed a set of

⁸³According to a [study](#) conducted by the Kulczyk Foundation in 2020, one out of five women in Poland have difficulty buying suitable hygiene products and 40% of women with financial difficulties were forced to stop buying hygiene products.

⁸⁴For more information about this programme, see subchapter 4. "Social information", section 4.2 "How we manage social topics", subsection 4.2.1 "Own workforce", of this subchapter.

actions aimed at raising awareness of the importance of protecting and preserving ecosystems and biodiversity among all members of the surrounding communities (consumers, students, children).

As regards protecting biodiversity and as we have been doing since 2019, we joined Portugal Chama, a campaign by the Agency for the Integrated Management of Forest Fires to raise public awareness, especially in areas most at risk of fire, of the importance of prevention during the hottest months of the year. Pingo Doce, Recheio and Amanhecer used their websites, social media platforms and in-store radio to convey the messages of fire prevention and good practice.

Under the "Mar Vivo" (Living Ocean) programme, and as in previous years, Pingo Doce joined Jerónimo Martins' sustainability partnership with the MEO Surf League to promote six awareness actions with children from the places where the competitions took place, including beach cleanups. The Company also organised another edition of the Mar Vivo Brigade, the largest beach cleanup action with schools in the country. More than 64,000 students from 14 districts across the country collected 5.8 tonnes of rubbish.

Another programme implemented in 2024 by Pingo Doce was focused on protecting marine ecosystems, aimed at raising awareness among the younger generations of the importance of preserving the oceans. The "Leva a tua turma ao Oceanário" (Take your class to the Oceanarium) programme, in partnership with ABAAE, takes primary school students to the Lisbon Oceanarium and challenges them to study a species listed as 'Endangered' on the IUCN Red List as a way of sparking interest in the importance of marine biodiversity.

To raise awareness of the protection and preservation of pollinators, Ara has been spearheading the "Protect the Bees" project since 2021, in partnership with Fundabejaz. In 2024, the Company's support helped:

- rescue one million bees, sent in hives to various nature reserves to recover and stabilise;
- deliver 1.4 million recovered bees to beekeepers and farmers;
- hold 91 awareness-raising campaigns involving 6,420 participants.

In Portugal, we held the "SOS Pollinators" campaign, in partnership with Quercus, which, since 2014, has been raising awareness of pollinator conservation and biodiversity among schoolchildren and providing training to different organisations (local entities, farmers, beekeepers and technicians). "SOS Pollinators" hosted the first edition of "Escolas Amigas dos Polinizadores" (Pollinator-Friendly Schools) in 18 schools in four municipalities and which saw 1,021 students participate, and the third edition of the "Constrói um Hotel para Insetos Polinizadores" (Build a Hotel for Pollinating Insects) competition, in which 28 schools took part. We also took part in an event held in Portalegre, in the library of the José Régio Primary School, which aimed to emphasise the role that companies, associations and school communities should play in preserving biodiversity – at the event, various initiatives promoted by JMA were presented.

In Poland, Biedronka has been supporting Salamandra (Polish Society for Nature Conservation) since 2021. In 2024 the partnership materialised by supporting the project "Support for wild insect pollinators". The project consisted of three main activities: "Biedronka with Salamandra for wild-insect pollinators in natural gardens" grant competition, educational communication published in SALAMANDRA Nature Magazine (on the importance of respecting and protecting wild-insect pollinators) and sponsorship of building the Polish Red List of endangered species with special consideration of pollinators. Biedronka was awarded the title of "Patron of Nature Conservation 2024" by Salamandra for its commitment and contribution to biodiversity conservation.

We also host and promote several external events to raise awareness of environmental issues among the local population. The "A Graça Gracinha" awareness-raising initiative, developed by the Azambuja Town Council, was held at our distribution centre in Azambuja, on the outskirts of Lisbon. It included three awareness-raising activities for children from the local community focusing on protecting biodiversity, preserving the environment, and respecting nature.

Another mechanism for disseminating knowledge and raising environmental awareness is our social media platforms, through education campaigns. In 2024, of note is Ara's Instagram campaign on International Forest Day, with questions about forests and biodiversity in Colombia, to raise awareness of nature conservation, and a post on its social media pages on Earth Day, with information about actions

taken by the Company to protect ecosystems and mitigate its impact on the environment, in which it challenged customers to adopt good environmental practices.

Volunteering

In 2024, over a thousand employees took part in volunteering activities, donating more than 3,600 work hours and more than 9,000 hours of personal time. The following initiatives are particularly noteworthy:

- the “Voluntários Clientes 70+” (70+ Customer Volunteers), a programme created in 2020 during the Covid-19 lockdowns to help elderly customers do their shopping and delivering their purchases to their homes. Since the programme was launched, 233 volunteers have done shopping for more than 370 customers, making over 4,500 deliveries (more than 115,000 products);
- as part of its agreement to support the GNR, Pingo Doce organised a volunteer initiative with its Campo Grande employees to offer food baskets to around 1,800 elderly people in extremely vulnerable situations;
- “JAP in a day”, a Junior Achievement Portugal programme, brought together around 50 employees who implemented the various programmes the organisation offers in a single day in 25 schools, focusing on entrepreneurship and citizenship, financial literacy, and employability skills;
- we welcomed four trainees from the Girl Move Association, an initiative we have supported since 2016 aimed at training and empowering young Mozambican women to become agents of development in their communities. The training took place over three weeks, one of which involved visits to various Group facilities to see the links in our value chain, followed by a two-week internship with eight tutors. An additional 20 employees also offered their time to teach the trainees;
- at Hebe, employees have one volunteering day per year. Hebe provides a list of social associations/organisations to employees, who are free to choose which one they would like to dedicate their volunteering day to. In 2024, a total of 17 employees participated in this initiative;
- [Szlachetna Paczka](#) (Noble Gift) is a social programme in Poland that supports people in need and social isolation (elderly people, large families, people injured in accidents, people who are ill, and people with disabilities). Biedronka employees are challenged to prepare baskets that are then delivered to the identified beneficiaries. In 2024, a total of 867 employees participated in this initiative;
- 72 Ara employees took part in a volunteering initiative organised in partnership with the TECHO Foundation (a Latin American NGO present in 19 countries working to build homes for people living in substandard housing and lacking basic standards of hygiene and comfort). Ara employees helped build three emergency homes for vulnerable families in Cali, Medellín and Barranquilla (24 employees in each city);
- more than 150 Ara employees planted 556 trees in various environmental volunteering actions: (i) in partnership with the Immensamente Foundation, 21 employees planted 100 trees in the Ganchancipa area; (ii) in collaboration with the Fundabejaz Foundation, in the Pereira area, 100 employees planted 206 trees; and (iii) together with the Efecto Mariposa Foundation, 32 employees planted 250 trees in the Bogotá Reserve;
- 28 Ara employees took part in a beach cleanup organised by the Chambacú Foundation (1.2 tonnes of rubbish was collected).

Indirect support for affected communities

[ESRS 2 S3-4, ESRS 2 MDR-A, ESRS 2 MDR-M]
[GRI 3-3, GRI 203-2, GRI 413-1]



We regularly invite social organisations into our stores to hold campaigns to collect food and other items. We also participate in fundraising initiatives to support charities.

Portugal

Pingo Doce held 19 campaigns to sell vouchers that could be redeemed for food and other products (more than 30 tonnes of products collected in the case of vouchers exchanged for Private Brand products) to raise funds for institutions that help people in social emergency situations. Organisations such as the Portuguese Food Bank and the Portuguese Red Cross were invited to hold in-store collections, collecting

over a million products. In all, Pingo Doce's customers donated the equivalent of more than 546,000 euros (8% less than in 2023).

During the Christmas campaign, Hussel and Jeronymo teamed up to support the children of SOS Children's Villages, inviting their customers to offer a jelly sweets product by purchasing vouchers. A total of 224 products were donated.

To support the financial sustainability of third sector organisations and to foster social entrepreneurship, Pingo Doce sells products produced by institutions that are dedicated to fighting social exclusion. Since 2011, we have supported CEERDL – Centro de Educação Especial Rainha Dona Leonor, a cooperative that helps over 500 people with a disability or mental illness. In 2024, Pingo Doce bought over 35,000 mono-lily bouquets from CEERDL, which accounts for around 25% of the cooperative's annual flower farming revenue. This successful partnership has led to increased production which, in turn, has helped to improve social services and the integration of people with disabilities in the labour market. At the end of the year, CEERDL employed 15 people with disabilities.

Poland

Biedronka carried out several food collection campaigns among customers for people in need. More than 540 tonnes of products were collected, 11% more than in 2023.

Caritas Polska was present at nearly one thousand Biedronka stores to collect food as part of the "Yes, I Help" campaign, collecting over 147 tonnes of food, which was used to offer Easter meals to families in greater need. At Christmas, a similar campaign was held in over 1,050 stores, with 152 tonnes of food collected from the Company's customers.

The Federation of Polish Food Banks also organised food drives over Easter and Christmas. In March, under the theme "Easter with Dignity, Not with Hunger", more than 490 stores collected over 70 tonnes of food from their customers and, in November, the "Would you not help us?" campaign saw over 700 stores collect 120 tonnes of food.

As in the previous year, in 2024 Stowarzyszenie Wiosna (Spring Association) launched the Szlachetna Paczka (Noble Gift) project for vulnerable people. The baskets containing food, personal hygiene products, small electrical appliances, clothes, shoes and toys, valued at over 28,000 euros, were prepared by more than 860 volunteer Biedronka employees from store teams, distribution centres and offices. The baskets were donated to a total of 30 families.

At Christmas, the usual "Magnetic przyciąga dobro" (Magnetic Attracts Kindness) campaign was held. The proceeds from the sale of Private Brand Magnetic chocolates were distributed to families in situations of economic vulnerability. Support from Biedronka's customers saw more than 81,000 euros donated to the association.

Biedronka was once again the main sponsor of the 32nd final of Wielka Orkiestra Świątecznej Pomocy - WOŚP (Great Orchestra of Christmas Charity), the largest charity event in Poland, held in January 2024. Through the sale of official merchandising and the nationwide collection of donations from customers, more than 1.5 million euros were raised, used to purchase and donate equipment to children's hospitals for the diagnosis, monitoring and rehabilitation of respiratory illnesses in children and adults. In December 2024, the 33rd edition of the event was launched, this time focusing on support in the field of pediatric hematology and oncology.

Hebe provided more than 191,000 euros in indirect support, in partnership with make-up and cosmetic products suppliers, which were donated to institutions that support women, teens and orphans.

Colombia

At Ara, the "Dona tu vuelto" programme, which encourages consumers to round up the value of their purchases, raised more than 668,000 euros.

The amount raised for Aldeas Infantiles SOS Colombia (SOS Children's Villages Colombia) was distributed between the "Acogimiento Familiar" (Foster Family) programme, for families at risk of separation, and the

"Fortalecimiento de Familias de Origen" (Strengthen Families of Origin) programme, for children and young people taken away from their families. Aldeas Infantiles SOS also works with families in situations of violence and in emergency situations. In 2024, the funds raised helped give more than 5,200 children and young people access to foster care programmes, temporary foster care programmes, programmes to strengthen families of origin, and emergency response programmes.

Ara customers were also invited to contribute to projects supported under the "One Million Reasons" programme, in particular the project to create the first food bank in the Pacific region and UNICEF's "Niños del Futuro" ("Children of the Future") project.

Commitments

[ESRS 2 S3-5, ESRS 2 MDR-T]
[GRI 3-3]



The Group's commitments related to this topic are detailed in subchapter 6. "Sustainability commitments" of this chapter.

4.2.3. Consumers and end-users

[ESRS 2 SBM-3]



Jerónimo Martins' Companies are committed to our long-standing vision of democratising the access to high quality products that are simultaneously safe, innovative and affordable, while contributing to public health.

Throughout our more than 230-year history, the focus of our activity has always been our consumers. In 2024, we had more than 6,000 stores and related e-commerce services, that connect thousands of suppliers (from micro, small and medium to large enterprises that work to meet our production criteria), and thousands of our employees, to reach millions of consumers from different groups, from children to the elderly, in Portugal, Poland, Slovakia, Czechia and Colombia.

This multi-stakeholder relationship allows us to identify and value the different expectations of consumers, partners, suppliers, and employees to:

- deliver the best products, services and experiences to our customers;
- enhance the reputation of our brands and the trust of our stakeholders;
- ensure the access to information for all stakeholders;
- maintain our ongoing relevance and our financial performance.

Our material topics related to consumers are focused on ensuring product quality and safety standards, product affordability, product and service innovation⁸⁵.

To meet stakeholders' expectations, Jerónimo Martins' strategic goals, policies and guidelines for consumer engagement, product development, remediation activities and targets are spread across our Companies so that a coherent approach to the management of the material topics can be achieved. They are updated whenever necessary.

Engaging with consumers

[ESRS 2 S4-2]
[GRI 3-3, GRI 2-12, GRI 2-29, GRI 413-1]



Whether at store level or through various digital channels, our Companies actively engage with consumers to understand their needs and preferences, which helps us to adapt and improve our offer. This approach supports our mission of providing accessible, safe and high-quality products, while fostering local economic development. We have three main ways of engaging with consumers, in line with our business strategy and the commitments set in our Code of Conduct:

⁸⁵ Detailed information on how we determined these topics is available in subchapter 2. "General disclosures", section 2.5. "Impacts, risks and opportunities management and double materiality assessment".

- Research and customer insights, which are critical to guide our commercial decisions.
- Providing consumers with relevant, trustworthy information about product price, quality, safety and innovation.
- Customer support services.

Gaining customer insights

Across all the countries in which we operate, our teams analyse market trends and other key areas to support commercial and operational planning. This helps guide decisions that affect pricing and consumer affordability. Actions are then taken based on these insights.

To better understand our consumers, we regularly conduct phone interviews, focus groups, observational studies, global trends' studies, and in some cases using data-driven techniques that can include real-time dialogues to learn about consumers' in-store experiences, and their perceptions of product quality, innovation and , and their respective importance. This feedback helps us to identify what consumers want and where we can improve.

We also engage with customers through social media, including Facebook, Instagram, WhatsApp, LinkedIn and TikTok. We reply to customer questions and join conversations to receive both positive and negative feedback, ensuring we address any concerns in a prompt manner.

We also run brand and product activation campaigns, giving customers the chance to try our latest products and share their experiences.

Providing information to consumers

We provide information to help our customers make informed choices through the Companies' websites and social media channels, informational campaigns and also on products and packaging. To help consumers choose what best suits their needs, we adjust the assortment and reinforce product communication adapted to the reality and specificities of each market.

Product information

[GRI 417-1]

In addition to technical and regulatory information on food packaging, such as composition and nutrition tables with values per 100 grams and per serving, or guides for non-food items such as household or personal hygiene appliances, we voluntarily disclose more information.

Voluntary labels and information provided by Biedronka:

- Non-GMO on Private Brand plant-based products⁸⁶, consisting mostly of corn and/or soy (above 50% of the product's net weight);
- Fibre content in the nutrition table;
- Specific symbols on vegan and vegetarian products based on own and other criteria required under Polish law (17 new products; 154 in total by the year-end);
- Icons on lactose-free, Omega-3 source, and gluten-free products (in the latter case, we maintained our partnership with the Polish Coeliac Society, ensuring the absence of cross-contamination. In 2024 we obtained certification for 15 new products, amounting to a total of 131 by the end of the year);
- "No sugar added" label on 28 products;
- Symbols on alcoholic beverages (calorie count, pregnancy warnings and responsible driving).
- "Wybiegaj To!", which quantifies the physical effort to burn the calories from one serving of the product;
- "1 of Your 5 a Day" (daily recommended amount of fruit and vegetables). Three new products bore this label;

⁸⁶ These plant-based products contain mostly corn or soy (above 50% of the net weight); labelling applies to two dimensions, in compliance with Polish law: (i) "non-GMO" (for foods of plant origin and foods composed of more than one ingredient, excluding products of animal origin and feed, free from genetically modified organisms); and (ii) "Produced without the use of GMOs" (for products of animal origin and foods composed of more than one ingredient, free from genetically modified organisms).

- “Eat Fish Twice a Week” label was launched for the first time in a fish product to raise awareness for the importance of consuming fish. The increase in fish consumption was not significant in the past 25 years in Poland, being little over 14 kilograms per person, per year, which carries problems for consumers in their access to food that is a source of micronutrients, minerals and vitamins needed for a healthy body functioning;
- “Garść Orzechów” (A Handful of Nuts). According to experts, nuts are a valuable food product that provides many essential nutrients, and its regular consumption can be an important part of a diet that supports cardiovascular health. Five products were enrolled. It also developed new iconography to include Slovakian language and adapt it to this market;
- “Vegan Friendly”, on non-food products. which was added to 17 new products.

Voluntary labels and information provided by Portuguese Companies:

- “Non-GMO”, on products with corn or soy (the label was in 71% of the products with more than 50% of corn or soy in their net weight by the year end⁸⁷ – it was 30% the previous year).
- Specific symbols on alcoholic beverages (calorie count and pregnancy warnings on 100% of the references, responsible driving on 74% of the eligible references).
- Icons for sugar-free, lactose-free, fat-free, gluten-free and source of Omega-3 products.
- Identification of Pingo Doce cold meat products with less fat and salt, according to the requirements of the “Escolha Saudável” (Healthy Choice) programme, in collaboration with the Portuguese Heart Foundation.

In 2024, Biedronka applied the Nutri-Score label to 138 products more, increasing the total number to 543 (34% up on 2023) and raised the number of brands selected for categorisation to 41 (including six for the Slovakian market). Nutri-Score was present in 872 Pingo Doce products (48% more than in 2023) and in 197 Recheio products (38% more)⁸⁸.

In Colombia, as required by law, the nutritional information per portion (100g or 100ml) is displayed on the back of the packaging, while labels indicating sodium, saturated fat and sugar content above the levels recommended by the health authorities are on the front of the packaging. All food products covered by this normative carry these symbols, both on Ara Private Brands (204 products) and on specialized perishables such as packaged baked good (28 products). Pingo Doce wines sold by Ara also carry the responsible driving and pregnancy warning symbols.

Information in other media

Pingo Doce prints cooking tips and suggestions on the food packaging, always promoting the use of fruit and vegetables as side dishes. The Company also uses its website, social media and Sabe Bem (Tastes Good) magazine to promote the Mediterranean diet. This magazine was the most read publication in Portugal in 2024, reaching 627 thousand readers in each one of its bi-monthly editions. The publication usually includes articles written by the Portuguese Directorate-General for Health. Pingo Doce also has on its website a large collection of recipes encouraging the reuse of leftovers. Also, on its website is a list with lactose-free and gluten-free Private Brand products, which is updated monthly by the Nutrition team.

Since 2021 Pingo Doce and CUF (a business group specialised in health care) have promoted the programme “A Saúde Alimenta-se” (Feeding Health), which raises awareness of the role that a diversified and balanced diet can play in health, encouraging consumers to select the foods that best suit their needs and lifestyle⁸⁹.

Biedronka has published four Czas Na... (Time For...) digital magazines in 2024, focusing on seasonality and more sustainable lifestyles. Dada magazine, Biedronka's Private Brand specialising in products for babies, children and mothers, is produced in a collaboration between Instytut Matki i Dziecka (Institute of Mother and Child) and Biedronka's Quality Department. Two digital books were developed in 2024 as a result of this partnership.

⁸⁷ Considering 23, two more in comparison with 2023, Pingo Doce products (Pingo Doce, Go Bio and Pura Vida ranges); and 28, five more in comparison with 2023, Recheio products (Masterchef and Amanhecer ranges) on sale in 2024. “Non-GMO label”: 11 Pingo Doce products and 25 Recheio products. Out of a total of 51 eligible products, 36 carried the “Non-GMO” label.

⁸⁸ More information [here](#) and [here](#).

⁸⁹ To learn more, visit the [Pingo Doce](#) and [CUF](#) websites.

The Company also makes an extensive use of media formats such as leaflets, newspapers and publications on social media to spread knowledge about healthy eating habits.

Just before the start of the 2023-2024 academic year, Biedronka launched the educational and loyalty campaign Gang Mocniaków, aimed at raising the awareness of younger generations to the “superpowers” of food, focusing on fresh produce and in the banner’s exclusive brands. Also in the current 2024-2025 school year, a new campaign dedicated to product development - Gang Produkcików (the Products Gang) was developed with 17 heroes. To extend the reach of its communication, Biedronka became also part of the Roblox gaming platform, with a virtual store and minigames on the Gang Produkcików thematic, which allow players to assume the role of employees and customers of Biedronka stores. In the virtual store, players can shop, clean stores, help customers, scan product barcodes at the checkout, restock shelves, handle deliveries, and even bake bread. The game was promoted on Biedronka's social media, in collaboration with influencers, and also on the Company's website and on the Roblox platform.

Customer Support Service

Communication between our Companies and their customers is also assured through direct contact at store level, through our employees, namely store managers, with whom consumers can interact and address any issues or concerns they may have. Clients can also contact the Customer Support Service (CSS), specialised structure existing in each Company that aim at ensuring an efficient and effective response to their suggestions, compliments, ideas, requests for information and complaints. These services are also dedicated to resolving situations related to, among other things, the day-to-day operation of the stores, our e-commerce stores, the services and products offered, and promotional campaigns.

Companies’ CSS can be contacted by email, website, telephone, mobile applications, social media and other means. Depending on the Company, these means of contact may be advertised in the stores, on the packaging of Private Brand products, on receipts and, when applicable, on the Company’s website. All Companies have their data privacy policies published on their websites.

Customers can also contact the Group’s Customer Ombudsman office or the local Customer Ombudsman office in Poland. All these contacts are available at the Group’s Customer Ombudsman office.

Customer Ombudsman

Jerónimo Martins Customer Ombudsman’s office is the last resort for resolving complex and structural issues that are either beyond the scope of action of the CSS or have been considered by customers as not been fully addressed by those channels.

The Customer Ombudsman is a body independent from Companies and their Customer Support Services, whose mission is to represent customers within the Jerónimo Martins Group, to whom they can turn to protect and promote their rights and legitimate interests. Guided by the values of independence, impartiality, neutrality and confidentiality, the Customer Ombudsman is supported by a dedicated team. The Ombudsman can issue opinions and recommendations to ensure the quality of the service provided to customers and also propose initiatives to improve it.

Customers can contact the Customer Ombudsman office by email, telephone and its website, which is advertised at both corporate and Company level, in stores and on its website. The data protection policy of the Customer Ombudsman office is disclosed on its website.

Both the CSS and the Customer Ombudsman office monitor key performance indicators from the day-to-day dialogue with customers to identify areas of improvement, which may include reviewing internal procedures and assessing the quality of products and services, and also of the features of promotional campaigns.

Ethics Committee

The Group’s Ethics Committee enforces and monitors compliance with our Code of Conduct, considering that its scope spreads across several business dimensions and regulates employees’ engagement with many stakeholders, including consumers.

Regarding the material impacts for consumers, the Code of Conduct commits the Group to adopt trade policies aimed at ensuring the protection of consumers' rights in force in the legal systems of the countries where we operate, namely on quality and safety standards for products, including ingredients and labelling, services and facilities.

Accessible to all stakeholders, the [Ethics Committee](#) provides a direct contact to receive reports of potential or actual irregularities in the application of the Code of Conduct and Anti-Corruption Policy.

Through a dedicated website, a whistleblowing mechanism is in place, to further promote an ethical culture embedded in the value creation process of our Companies. The website includes, among other information, a description of the reporting process steps and frequently asked questions. This mechanism adds to our risk management procedures for preventing impacts on our stakeholders and business, and is ruled by the [Whistleblowing Policy](#) and its related [Data Protection Policy](#). According to the legal frameworks, this policy defines Jerónimo Martins as the Data Controller within the scope of managing the communications of irregularities (complaints) submitted to the dedicated channel of the Jerónimo Martins Ethics Committee, and a set of rules:

- Establishment of a Data Controller Officer and a direct email;
- Data collected, purposes and withholding periods;
- Rights of the whistleblowers and the means of exercising rights;
- Security measures;
- Communication of personal data;
- The use of Google Analytics in terms of data for reporting and analysis, anonymization of IP addresses to European Union Member States' servers and its terms of service and privacy policy, and the option to turn off this service;
- The right to amend and update the policy.

The Whistleblowing Policy lays out the rules about the reporting process itself and clearly identifies how the Ethics Committee and the Ethics Offices ensure, among other aspects:

- The confidentiality of the identity of whistleblowers and of all information that directly or indirectly enables an identification of the whistleblower;
- The limitation to a dedicated team of internal access about whistleblowers and reported situations and the retainment of data for a predefined legal period and/or, if applicable, until the conclusion of legal obligations, establishing that personal data irrelevant to the case is to be deleted;
- The right to access, rectify and delete data reported by whistleblowers, through the whistleblowing platform at any time;
- The prohibition of retaliation (threats, attempts or any actual acts or omissions occurring as a result of an internal or external report or public disclosure that, directly or indirectly, cause or may cause the whistleblower any unjustified material or non-material damage) and procedures, if occurring, to solve this breach of the Code of Conduct (which may result in disciplinary measures, in addition to civil and/or criminal liability).

For more information about the Ethics Committee's mission, responsibilities and composition, see Chapter 4 "Corporate Governance", Part I – Information on Shareholder Structure, Organization and Corporate Governance, Section B – Corporate Bodies and Committees, Subsection II - Management and Supervision (Board of Directors), C. Committees within the Board of Directors and Board Delegate, 29. Description of the Powers of Each of The Committees Established and a Summary of Activities Undertaken in Exercising Said Powers. The articles of regulation for the Ethics Committee, the irregularities policy and contacts are available in the Jerónimo Martins corporate [website](#).

Remediating impacts and channels for consumers to raise concerns

[ESRS S4-3]



Remediation processes

The Companies' CSS and the Jerónimo Martins' Customer Ombudsman and its local offices are committed to addressing consumer grievances and concerns in a timely and effective manner, particularly those related to the material topics identified earlier in this subchapter (product quality and safety, product and

services' innovation, and product affordability). The internal due diligence processes to remediate any actual or potential negative impact from our brands' products or services are described below.

Customer Support Services

Through a structured process, these services aim to enhance customer satisfaction, thus reinforcing trust in Jerónimo Martins' Companies and brands, and to gather valuable inputs that can serve a better alignment of products and service to consumers' expectations:

- **Complaint Reception:** customers can submit any grievance through various means, as seen before, and the CSS receives and acknowledges it promptly.
- **Evaluation & Investigation:** the CSS assesses the issue by gathering relevant information, identifying any potential root cause and determines if the grievance is valid.
- **Solution Proposal:** if the grievance is considered valid, the CSS tries to offer a solution for the issue. This can be, among others, a clarification about the reported situation, a personalized apology, a discount offer through a voucher, a refund, a replacement or a reparation of products, based on the nature of the grievance and according to the conclusions drawn from the diligence process implemented alongside relevant functional areas.
- **Implementation:** once a solution is agreed upon, the CSS acts rapidly and keeps customers informed of its implementation progress.
- **Improvement:** the CSS report information to the functional areas that can trigger the identification of improvement opportunities considering the customer experience and feedback, aiming at the continuous improvement of products, services and overall Companies' operations.

The management indicators for CSS are for internal use only. They may include the number of contacts handled, the type of contacts received (information requests, complaints and claims, compliments and suggestions), the topics addressed (typically product quality, payment services, customer service, store conditions, and promotional campaigns), the most commonly used contact methods, the average resolution duration, the customer satisfaction rating, the net promoter score and the resolution rate.

Customer Ombudsman

Jerónimo Martins Customer Ombudsman Office mediates customer relations with Companies, being independent and neutral. Each process is analysed, and the necessary steps are taken, ensuring that each one is assigned to a manager who will keep an open line of communication until final clarification is provided to customers. Jerónimo Martins Customer Ombudsman Office mediates and responds based on facts ascertained, engaging the relevant internal interlocutors and departments to resolve the situation. Opportunities for improvement are recommended to the Companies and performance indicators are shared, monitoring commitments undertaken and encouraging internal discussion on the rights and expectations of customers.

The Customer Ombudsman key performance indicators include⁹⁰:

- the number of new occurrences during the year and those that transitioned from the previous year;
- the type of occurrences, categorised as complaints, requests for information, compliments and suggestions;
- the main topics addressed;
- Companies most impacted;
- the preferred contact channels used by consumers;
- the average time taken to respond;
- the resolution rate.

⁹⁰ The Customer Ombudsman key performance indicators are fully disclosed on the Jerónimo Martins corporate [website](#).

Occurrences

Occurrences	2024	2023	Δ 2024/2023
New	2,528	2,125	+19.0%
Carried over from previous years	23	16	+43.8%
Handled	2,551	2,141	+19.1%
Closed	2,517	2,118	+18.8%
Resolution rate*	98.7%	98.9%	-0.2 p.p.

* Resolution rate = Processes closed / Processes handled.

In 2024, the Customer Ombudsman managed 589 new occurrences, 8% more than in 2023, due to the increase of contacts in all Companies. 1,147 incidents were referred to the CSS, as they were related to more operational issues and required a first response from those services (9% more than in 2023). 792 occurrences did not fall within the scope of the Customer Ombudsman's Office and were referred to the competent departments.

Thus, in total, 2,528 new occurrences were received at the Ombudsman's Office during the year, representing an increase of 19% compared to 2023. From the previous year, 23 were carried over, totalling 2,551 cases handled. The resolution rate, which measures the level of service provided, was similar to 2023: 98.7% of the cases handled in 2024 were closed within the year.

The contact channels most used by customers to communicate with the Ombudsman's Office were email (65%), telephone (20%) and website (13%). The contacts received were classified as Complaints (87%), Requests for information (8%), Compliments (3%) and Suggestions (2%). Pingo Doce and Biedronka were responsible for 99% of the occurrences. The main topics managed by the Ombudsman's Office were prices and promotions, employee's attitudes, noise and environmental pollution, and overall dissatisfaction.

In 97% of the 2,302 cases closed with a response during the year, customers received a response in less than 30 days.

Ethics Committee channels

As mentioned above, consumers can also contact the Group's Ethics Committee to report any ethical concerns or non-compliance with the law and the Code of Conduct. The Ethics Committee has its own contact channels available to all stakeholders, as described in more detail above in "Customer Support Services" in this point⁹¹.

The process takes the following steps, in accordance to the law and the [Whistleblowing Policy](#):

- Once a report has been received by the Committee, the whistleblower receives an acknowledgement of receipt within a maximum of seven days.
- The appropriate internal steps are taken to assess the case.
- Follow up on a report by the Ethics Committee may include, for example, forwarding it to other Jerónimo Martins Group reporting channels (with the prior consent of the whistleblower), closing it due to a lack of evidence, opening an internal inquiry or forwarding it to a competent authority.
- Information on the follow-up of internal reports is shared with whistleblowers, to the extent legally permissible.
- Whistleblowers may be asked to provide further information during the inquiry.
- At the end of the investigation, a final report will be drawn up with the findings.
- A response is sent to the whistleblower within a maximum of three months following the acknowledgement of receipt, or to six months depending on the complexity of the case.
- Whistleblowers may request, at any time however, to be informed of the result of the assessment made, within 15 days of its conclusion.

⁹¹ See also subchapter 2. "General disclosures", section 2.3. "Stakeholder engagement and communication channels", subsection 1.3.1. "Mechanisms and channels for raising concerns", of this chapter.

Effectiveness of the resolution mechanisms and measures proposed

The channels described before are led by the principles of accessibility, accountability and transparency, through:

- respect for the law and consumer rights, including the respect for human rights in terms of access to fair treatment, non-retaliation, non-discrimination and freedom of expression;
- the implementation of clear internal procedures for handling complaints, with designated teams and professionals;
- the analysis of potential systemic patterns so to update and improve policies, processes, employee training and products or services in order to prevent similar grievances in the future and to reach a continuous improvement of the remediation process;
- keeping an open, bidirectional channel of communication with customers regarding the grievance process.

Our Companies value dialogue with customers, with each case treated on an individual basis as we seek to understand the customer's perspective and to reach a mutually agreed resolution whenever possible and in accordance to the law. The basis of our remediation practices is to offer a fair and transparent resolution, which may take the form of a clarification about the reported situation, a personalised apology, a discount offer through a voucher, a refund, replacement or reparation of products, depending on the nature of the grievance and according to the conclusions drawn from the due diligence process carried out alongside the relevant functional areas and the Companies' policies on these matters.

We believe that these interactions benefit both the consumers and our Companies, as they build trust in our commitment to fair treatment and allow for continuous improvements in our day-to-day business to prevent similar situations from recurring.

Actions towards our consumers

[ESRS 2 MDR-A; ESRS S4-4]



Recognising the contribution that a Group like ours can make to society's adoption of healthier eating habits, we strive to minimise the use of artificial ingredients and processing methods in the foods we produce and market. We also focus on diversifying options for consumers with specific needs or preferences, such as food intolerances and allergies.

We also believe that in open and free markets such as those where we operate, customers trust is the most valuable asset a business can have – and it translates into customer loyalty. As such, we are committed to making a constant effort to offer consumers a variety of solutions at competitive and affordable prices, pursuing the highest safety standards and value for money in our products and services.

Product quality and safety

Continued investment in the certification and supervising of our processes, facilities and equipment, as well as monitoring the upstream production activities of our supply chain, are the foundations of the reputation capital of our banners and businesses. To preserve this, we recognise our responsibility to prevent and mitigate negative impacts while promoting a safe customer experience in our stores and through our products. To that end, we rely on a set of different actions, including:

- risk assessments and Companies' certifications;
- internal audits of stores and distribution centres;
- facility analyses;
- product analyses;
- product recalls and withdrawals;
- food hygiene and safety internal training.

Our cooperation with thousands of suppliers that produce our perishable and Private Brand products is carried out through rigorous assessments (including monitoring corrections to their procedures if needed) to ensure that products are safe for consumption. Please see subchapter 5.2. "Business Conduct", section 5.2.1. "Selection and monitoring of suppliers" for more information about audits in the supply chain.

We believe that by promoting quality as an integral concept, our Companies not only contribute to the competitiveness and sustainable development of our business and our suppliers, but also generate consumer trust and improve the quality of life of the millions of customers who choose our stores every day.

In 2024, we carried out 18,219 internal audits of our infrastructures (8% more than in 2023), 252,851 analyses on work surfaces and, among others, product manipulators (3% less), and 89,832 on food products (3% more).

Risk assessments and certifications

[GRI 416-1]

The risk assessments made for our Private Brand products and perishables are carried out by our quality and product development teams and take into consideration factors such as:

- laws in force and the technical specifications issued by the official authorities;
- recommendations of the European Union and/or other official bodies;
- the Rapid Alert System for Food and Feed (RASFF) urgent notifications and known food fraud incidents;
- physical characteristics of products (such as perishability) and organoleptic properties (such as colour, texture, taste or smell);
- country of origin of production and/or supply of the products and the track record of trade partners;
- market expansion (stores and distribution centres);
- surrounding conditions (sanitation or weather conditions related to humidity and average temperatures);
- opting for facility certification schemes;
- results of past assessments.

Certification plays an important role in setting high quality and safety standards for our Companies' facilities, as it fosters a more integrated management approach for a business that comprises millions of products flowing through thousands of stores, while continuously contributing towards improving our procedures.

During 2024, the following certifications were renewed or extended to new facilities:

- ISO 22000:2018 at 17 Biedronka distribution centres for the storage and distribution of food products and at the Biedronka head office for the development of Private Brand food products.
- FSSC 22000 v.6.0 (which includes ISO 22000:2018) for the soup factory in Poland, with regard to ready-to-eat after heating and individualised packaging;
- ISO 9001 for the development of Private Brands in Portugal and post-launch product/supplier follow-up;
- HACCP⁹² in accordance with the Codex Alimentarius⁹³ for the two Pingo Doce central kitchens (with regard to food safety), 11 Recheio stores (two less than in 2023, explained by the transition of these and the Recheio MasterChef food service platform in Lisbon to the ISO22000 certification process shown below), and for all seven distribution centres in Portugal (with regard to food safety);
- Food Safety Management System, according to the EN ISO 22000:2018 Portuguese Standard, in 28 Recheio stores (two more vs. 2023) and three Recheio MasterChef food service platforms (one more vs. 2023);
- Organic product handling certification, in accordance with Council Regulation (EC) No 848/2018, was renewed in Poland for the 18 distribution centres. All our four distribution centres in Portugal that handle organic products hold this certification;
- Certification of 486 Biedronka stores regarding the correct storage and preparation of organic products.

⁹² The Hazard Analysis and Critical Control Points (HACCP) system is designed to prevent potential risks that cause harm to consumers, by eliminating or reducing hazards and thereby ensuring food is safe for consumption.

⁹³ A set of international standards aimed at promoting food safety and consumer protection. The Codex Alimentarius is available [here](#).

We also work with external auditors (independent and accredited laboratories) and have our own molecular biology laboratory, all of which contribute to an even safer and higher quality delivery to consumers. The Jerónimo Martins laboratory, located in Portugal, complements the verification made during the product development and supply processes and focuses on the authenticity of the ingredients in our products, from all Companies. It is accredited according to the NP EN ISO/IEC 17025:2018 Portuguese Standard (Instituto Português de Acreditação e Certificação – IPAC – is the certifying entity), a framework that sets laboratories' general competence requirements for testing and calibration. In 2024, over 6,900 Next-Generation DNA Sequencing (NGS) tests were made to molluscs, crustaceans, meat, fish and GMO screening.

Internal audits to stores and distribution centres

[GRI 416-1]

With specialised internal and, when applicable, external product safety and quality teams, and in accordance with the business unit and infrastructure to be assessed, internal audits are conducted by considering criteria arranged into dimensions such as basic hygiene conditions, cleanliness and disinfection, facility and equipment maintenance, good production practices, product handling, water availability, metrology, pest control, waste management, records, traceability, and procedure review.

These audits assign scores with specific levels to the business units (according to country and infrastructures, these can range from Inadequate, Basic, Satisfactory, to Good, Very Good or Excellent), and the potential corrective actions to be taken are made to any non-conformities identified. The timeframe to mitigate and remedy the identified issues may vary from immediate resolution to a subsequent audit.

Poland

Biedronka stores and distribution centres were audited by both internal and external auditors to check facilities, equipment and procedures.

Biedronka	Stores			Distribution centres		
	2024	2023	Δ 2024/2023	2024	2023	Δ 2024/2023
Internal audits	9,657	8,687	+11.2%	36	38	-5.3%
Follow-up audits	172	248	-30.6%	-	-	-
External audits	38	34	+11.8%	23	9	+155.6%
HACCP Performance*	87%	84%	+3 p.p.	91%	88%	+3 p.p.

* HACCP implementation at Biedronka is evaluated based on requirements which are according to requirements on the Codex Alimentarius and European Union regulatory framework (Regulation (EC) No 853/2004 on the hygiene of foodstuffs). At the distribution centres, the compliance rate relies on the internal audits conducted under ISO 22000 – Food Safety Management System certification, which is based on the HACCP principles of the Codex Alimentarius.

More internal audits of the stores were carried out as a result of Biedronka's expansion (161 more stores than in 2023), of the increase in the number of meat counters (23% more compared to 2023)⁹⁴, and the growth of the number of micro-fulfilment centres for the Biek operation⁹⁵. The decrease in follow-up audits is due to the classification of the stores in the previous audits, which – because of its good results – led to a reduction in the frequency of monitoring.

Despite the fact that Biedronka adjusted the number of stores selling organic bread that were subject to external auditing, with three less stores than the previous year (-0.6%)⁹⁶, the number of external controls imposed by responsible authorities has led to an overall increase.

⁹⁴ There were 1,323 counters in 2024, 244 more than in 2023. In Poland, internal audits, including follow-up audits, of stores are outsourced to independent entities such as Diversey, Det Norske Veritas (DNV-GL), and Lloyd's Register.

⁹⁵ Implemented in 2021, this operation consists of micro-fulfilment centres (MFC) operated by employees to handle orders placed by consumers through the Glovo fast distribution partner application. By the end of 2024 Biedronka covered 23 locations (versus 18 in 2023) in the cities of Warsaw, Łódź, Kraków, Gdańsk, Poznań, Wrocław, Lublin, Bydgoszcz and Olsztyn. More information is available in chapter 2 "Management Report", subchapter 2 "Group performance", section 2.2. "Focus on profitable growth" of this report.

⁹⁶ In 2024, 486 stores offered an organic bread range (versus 489 in 2023). External controls relating to organic certification were carried out by BioCert, an independent entity duly authorised by official bodies for such purpose.

At distribution centres, the number of internal audits decreased slightly as a result of risk assessment – previous audits were carried out in 2023, making it no longer necessary to perform the same number of audits in 2024. The good audits' results that have been registered year-on-year have allowed for a reduction on the number of follow-up audits, which were therefore replaced by our standard internal audit procedure: a minimum of two audits per year, per location. The increase in external audits is explained by our compliance with the ISO22000 certification. In 2024, all audits happened at the beginning of the year, while in 2023 audits occurred even earlier, at the end of 2022⁹⁷.

Portugal

	Pingo Doce stores			Recheio stores			Distribution centres**		
	2024	2023	Δ '24/'23	2024	2023	Δ '24/'23	2024	2023	Δ '24/'23
Internal audits	486	485	+0.2%	86	99	-13.1%	38	31	+22.6%
Follow-up audits	3,006	2,886	+4.2%	365	246	+48.4%	235	196	+19.9%
External audits	91	74	+23.0%	18	21	-14.3%	9	7	+28.6%
HACCP Performance*	88%	87%	+1 p.p.	87%	84%	+3 p.p.	77%	84%	-7 p.p.

* At Pingo Doce and Recheio, HACCP implementation is assessed using own reference standards based on the Codex Alimentarius and which are adapted for the operating realities of the Companies.

** Also includes central kitchens and on-site canteens.

At Pingo Doce, despite the opening of ten additional stores in 2024 (bringing the total network to 489 locations), the number of audits slightly increased since priority was given to following-up on the stores identified as needing improvement in 2023. For the second year, this method has led to an increase in its HACCP performance, adding to the increase of 5 p.p. in 2023 versus 2022.

The number of Recheio stores in 2024 remained unchanged at 43. Nevertheless, the decrease in the number of internal audits is due to the risk matrix and prioritisation used by the operational food safety teams, that in 2024 have given priority to monitoring the correction of identified non-conformities in the previous year. The Company has increased its HACCP performance.

In the distribution centres, where audits also cover the central kitchens and internal canteens, the increase in internal and follow-up audits – registered since 2023 – is the result of a greater sampling, with three more distribution centres covered by the HACCP certification requirements, and continuous monitoring by a dedicated team. This led to a decrease in the associated performance, as more opportunities for improvement were identified.

In Pingo Doce, Recheio and in distribution centres, external audits are carried out by the local authorities according to their own planning.

Colombia

Audits to Ara stores were carried out by an independent entity (Diversey). Our internal quality teams carried out the audits on the distribution centres.

Ara	Stores			Distribution centres		
	2024	2023	Δ 2024/2023	2024	2023	Δ 2024/2023
Internal audits	2,715	2,422	+12.1%	12	10	+20.0%
Follow-up audits	1,402	1,513	-7.3%	9	8	+12.5%
Good hygiene and quality practices*	81%	80%	+1 p.p.	92%	94%	-2 p.p.

* The compliance rate shown refers to the score obtained on good practices, in line with criteria aimed at guaranteeing the quality and safety of the products according to the law, evaluating the operation itself and the control system and procedures. The criteria include, among others, hygiene and quality control aspects of the facility's conditions for handling the product and aspects related to product temperature, type of packaging, and to organic waste management procedures.

⁹⁷ At the distribution centres, internal audits are carried out by food safety and quality technicians, while external audits, within the scope of ISO22000 certification, are carried out by Lloyd's Register.

Internal audits at stores increased 12%, in line with the 10% growth of the network in the year (from 1,290 stores in 2023 to 1,438). Follow-up audits are carried out by internal and external audit teams, depending on previous results and based on internal risk metrics and the frequency of incidents – priority corrective measures are, therefore, subsequently evaluated. The decrease reflects more positive results in initial audits, and therefore fewer control points to recheck.

At the distribution centres, the number of audits is explained by the results of previous assessments. The previous year's performance level has decreased slightly due to changes in methodology. Standards have become stricter in what regards temperature control throughout the entire storage process, product dispatch and delivery to stores, as well as traceability systems.

Facility analyses

[GRI 416-1]

Poland

We carried out 14.3% fewer analyses than in 2023, reflecting the reduction of surfaces analysis (including work surfaces and utensils) and manipulators. This reduction is explained by a reassessment of the risk analysis of meat counters, that resulted in a lower frequency during the year, and the fact that there were less stores with juice squeezers (11 stores in 2024 versus 16 in 2023) and roasted chicken (28 stores in 2024 versus 38 in 2023), which contributed to the finished products category. The increase of water analyses is explained by the expansion of Biedronka network.

Number of analyses/samples collected in Poland	2024	2023	Δ 2024/2023
Work surfaces	103,596	121,919	-15.0%
Manipulators	8,290	9,480	-12.6%
Raw materials/Finished product	205	334	-38.6%
Water	2,445	1,885	+29.7%
Total	114,536	133,618	-14.3%

Portugal

A total of 124,906 food safety and quality analyses was carried out at Pingo Doce and Recheio stores, at distribution centres and other facilities (such as the fresh dough factory, kitchens and canteens), which represents a 9.6% increase compared to 2023. As regards work surfaces and manipulators, the increase is mainly related to the usual annual planning and the opening of Pingo Doce stores based on its new store concept "All About Food 2.0" that embodies the Company's long-term vision for the business, based on the banner's competitive advantages and key differentiating factors: Perishables, Private Brand and Meal Solutions.

Number of analyses/samples collected in Portugal	2024	2023	Δ 2024/2023
Work surfaces	61,003	51,461	+18.5%
Manipulators	19,928	19,867	+0.3%
Raw materials/Finished product	37,367	36,271	+3.0%
Water	6,608	6,407	+3.1%
Total	124,906	114,006	+9.6%

Colombia

In 2024, the number of analyses carried out increased 14% compared to 2023, as a result of the expansion of the Ara network.

Number of analyses/samples collected in Colombia	2024	2023	Δ 2024/2023
Work surfaces	2,793	2,284	+22.3%
Manipulators	2,589	2,285	+13.3%
Raw materials/finished product	2,549	2,285	+11.6%
Water	5,478	4,883	+12.2%
Total	13,409	11,737	+14.2%

Product analyses

[GRI 416-1]

The products we market are assessed as to their quality and safety at external, accredited laboratories. In total, 58,298 analyses of Private Brand food products were carried out (0.7% more than in 2023) and 20,879 on perishables (21.3% more).

Poland

Number of analyses/samples collected in Poland	2024	2023	Δ 2024/2023
Private Brand	23,077	20,833	+10.8%
Private Brand – Food	21,750	19,606	+10.9%
Private Brand – Non-food	1,327	1,227	+8.1%
Perishables	8,611	6,402	+34.5%
Fruit and vegetables	4,182	4,018	+4.1%
Meat and fish	2,991	1,698	+76.1%
Bakery	976	218	+347.7%
Eggs	462	468	-1.3%
Total	28,540	27,235	+4.8%

For the increase in the number of analyses of food and non-food products contributed Biedronka's expansion, the establishment of more partnerships with suppliers and the broadening of regular and seasonal assortments, which affected the volume of products to be analysed.

In the meat and fish category, the increase is explained by the expansion of stores with meat counters and, consequently, the inclusion of a greater number of products in the annual regular analyses plan. Furthermore, the number of *salmonella* and food fraud prevention analyses in these categories were much higher than in 2023. For bakery, the growth is due to methodological changes in laboratory analyses. Also, fruit and vegetables suppliers and assortment were added during the year. For eggs, although a slight decrease was registered, the number of analyses was in line with audit planning and risk assessment.

Portugal

Number of analyses/samples collected in Portugal	2024	2023	Δ 2024/2023
Private Brand	22,486	22,639	-0.7%
Private Brand – Food*	18,494	17,795	+3.9%
Private Brand – Non-food	3,992	4,844	-17.6%
Perishables	11,909	10,546	+12.9%
Fruit and vegetables	1,857	2,335	-20.5%
Meat	689	1,224	-43.7%
Fish	1,233	1,188	+3.8%
Bakery	498	598	-16.7%
Meal Solutions	7,632	5,201	+46.7%
Total	34,395	33,185	+3.6%

* Including routine analyses on the presence of gluten, genetically modified organisms, lactose, denomination of species, control analyses and extra analyses.

The expansion of the Pingo Doce network and its "All About Food 2.0" concept was the main reason for the increase in the number of analyses. In the case of non-food products, there were some methodological changes during the year which explain the results:

- the transition of the pet food references to the food category;
- the reduction of samples collected when the same product is sold under two different Private Brands.

As regards perishables, the most significant increase was in the meal solutions category, which is assessing ways of extending the shelf-life of new/current products. For fruit and vegetables, meat and bakery, the risk assessment and compliance history in previous years, as well as close monitoring of upstream production, led to a reduced need for analyses.

Colombia

Number of analyses/samples collected in Colombia	2024	2023	Δ 2024/2023
Private Brand	26,538	26,250	+1.1%
Private Brand – Food	21,202	20,516	+3.3%
Private Brand – Non-food	5,336	5,734	-6.9%
Perishables	363	260	+39.6%
Fruit and vegetables	152	100	+52.0%
Meat	123	142	-13.4%
Fish	35	8	+337.5%
Bakery	53	10	+430.0%
Total	26,901	26,510	+1.5%

The increase in the analysis of Private Brand food products is in line with the expansion of the regular assortment (195 more products than in 2023), the expansion of the store network and the usual risk analysis. As in food articles, the non-food category had its sampling plan adjusted in its frequency.

In the case of perishables, the higher number of samples collected is due to adjustments in the risk assessment of suppliers and products, including analyses for food authenticity. It is also explained by the inclusion of products from the new perishable's category. For the bakery category, shelf-life analyses were conducted to extend the display time of hot counter products like chicken pies. Analyses for new products that were launched also contributed to this increase.

Food recalls and withdrawals

[GRI 416-2]

With the aim of protecting public health and preserving the reputation and credibility of our Companies and brands, we do not hesitate in removing from market products that may pose a threat to consumers and society. Continuous monitoring, communication with the official health authorities, and the traceability of products and suppliers enable a fast and effective prevention of and/or reaction to any incidents.

There are two types of food product removal, which address specific risks to the health and safety of consumers:

- recall⁹⁸ (removal from sale of products with potential health risks);
- withdrawal⁹⁹ (removal from sale of products that do not pose a health risk).

⁹⁸ Recall: a mandatory action taken by the Group's Companies in response to inspections carried out by local authorities, the results of laboratory analyses or internal audits, or complaints/reports (from producers, retailers, government agencies, or consumers). Notices are published using the appropriate medium for consumers to return or destroy the product concerned.

⁹⁹ Withdrawal: a voluntary or mandatory action that can be taken on two occasions based on the risk analysis of the Companies or inspection by a local authority: (a) when quality defects (e.g. colour or texture), weight defects or irregularities are detected in the labelling (which does not pose a potential risk to the health or safety of consumers); or (b) as a precaution pending investigation into a potential risk to health and safety. If a credible risk is identified, the product is removed from sale and it is categorised as a recall.

In both cases, internal investigations are carried out and, if necessary, at suppliers, to identify the causes and implement the appropriate corrective measures for prevention.

The severity of the risks to consumer health and safety are classified as:

- Level I – critical (recall): aspects that may affect food safety and public health;
- Level II – food safety and quality (withdrawal): aspects that may affect the consumer experience and food safety of the product;
- Level III – labelling (withdrawal): aspects related to legal labelling requirements.

Food product recalls/withdrawals		Level I (Recall)		Level II (Withdrawal)		Level III (Withdrawal)		Total incidents	
		2024	2023	2024	2023	2024	2023	2024	2023
Group		4	6	163	221	54	63	221	290
Portugal (Pingo Doce and Recheio)	Private Brands	0	0	75	63	22	16	97	79
	Perishables	1	0	37	57	13	30	51	87
Poland (Biedronka)	Private Brands	2	5	32	56	17	10	51	71
	Perishables	1	0	1	1	0	0	2	1
Colombia (Ara)	Private Brands	0	0	9	36	2	7	11	43
	Perishables	0	1	9	8	0	0	9	9

In 2024, 221 incidents leading to product removals were recorded, 23.8% less than in 2023. The vast majority of these (98.2%) were Level II and Level III, i.e. withdrawals, while recalls were only 1.8% (critical, Level I). In the last case, there is a decrease of 33.3% compared to 2023, a year in which there was already a 53.8% decrease compared to 2022. These numbers show a downward trend in this indicator.

None of the Level I recalls had causes attributable to Jerónimo Martins, the main causes being requests from authorities and suppliers. To prevent nonconformities, and the need for withdrawals/recalls, we control and monitor suppliers and products, including in what regards the implementation of action plans, maintenance and packaging changes. Corrective actions are monitored to minimise the risk to consumers' health and to enable the marketing of products to be resumed.

Food quality and safety internal training

[ESRS S4-4]

Offering high quality and safe food products encompasses not only supporting and monitoring our supply chain, but also the permanent investment in professional teams that fully embed the competences needed to provide a skilled service to our consumers.

This investment follows the expansion of our activities in all countries, which has resulted in more employees being prepared for the daily work. The figures have therefore increased globally in our operations: the number of people trained in food safety and hygiene grew by 14.8% compared to the previous year as well as the training courses (17.4%). Therefore, the training volume increased 2.6%.

Food safety and hygiene training	Training volume*		Training courses		Employees trained	
	2024	2023	2024	2023	2024	2023
Group	249,346	242,940	9,727	8,285	57,130	49,772
Portugal**	60,328	37,548	3,592	3,426	11,120	9,597
Poland (Biedronka)	27,731	25,454	6,048	4,786	25,135	21,926
Colombia (Ara)	161,287	179,938	87	73	20,875	18,249

* Training volume = number of people trained x number of hygiene and food safety training hours.

** Includes Pingo Doce, Recheio, Jerónimo Martins Agro-Alimentar, Hússel and Jerónimo Martins Restauração e Serviços.

Training in Poland reached 25,135 employees, 14.6% more than in 2023, due to the network expansion and more training initiatives, thus resulting in a 9% growth in training volume. Some of the topics covered in Biedronka included: food safety systems (e.g., international HACCP standards), waste separation for recycling, washing and cleaning activities (to ensure good food production) and hygiene practices.

Training volume hours in Portugal rose by 60.7% in comparison to 2023, the most significant increase in all three countries. This was primarily driven by the renewal of the meat handlers card training which is required every three years. Other training courses included requirements associated with the food safety management system, under the international HACCP risk control standard and food defence practices.

In Colombia, though there were more initiatives and people trained, there was a decrease in the training volume due to the reduction in some courses' duration. The most significant example is the content of "Tiendas Siempre Limpias" (Stores Always Cleaned), whose duration was halved. The training covered topics such as in-store hygiene plan, water control and waste handling, quality audits and control visits, cold chain and critical control points.

Partnerships and support

We continued to hold regular talks with public and private benchmark institutions in the countries where we do business to learn and share knowledge about food, nutrition and health¹⁰⁰.

For several years, we have been a member of The Consumer Goods Forum and its Global Food Safety Initiative¹⁰¹, a coalition of action that gathers retailers and manufacturers from around the world. We are also present in the Global G.A.P. (Good Agricultural Practices), an organization that sets standards for safe and responsible farming regarding crop production, animal welfare, worker's welfare, traceability, among others. We are the only retailer with the head office in Portugal represented in its International Fruit and Vegetables Committee¹⁰².

Pingo Doce is an active member of APED (the Portuguese Association of Distribution Companies) and participates in technical committees, including those dedicated to food quality. The Company has several long-standing partnerships with organisations that aim to contribute to healthy eating as a pillar of public health, such as the Portuguese Directorate-General for Health within the framework of the National Programme for the Promotion of Healthy Eating, the Portuguese Coeliac Association and the Portuguese Nutrition Association (Pingo Doce sponsored the XXIII Congress of Food and Nutrition in 2024).

Pingo Doce also collaborates with academia, namely with the University of Lisbon's Instituto Superior Técnico (School of Engineering and Technology) and the Instituto Nacional de Saúde Doutor Ricardo Jorge (Ricardo Jorge National Health Institute).

In 2024, and for the second time, Biedronka was the main partner and sponsor of the Health Olympiad, developed with the Polish Red Cross. The competition is intended for students from primary schools to high schools. At each stage of the competition, participants complete a knowledge test covering issues related to healthy lifestyle, balanced nutrition, physical activity, ecology, and fighting food waste. The competition registered 16,348 participants from 1,150 primary and secondary schools.

In 2024 Ara maintained its participation in the ICONTEC (the national certification body of Colombia) technical committee groups, dedicated to fresh fruits and vegetables, fishing and aquaculture. The Company has also participated in the Colombia Productiva's¹⁰³ working groups alongside its strategic partners focusing on quality and safety of bakery products finalized at stores and meat.

¹⁰⁰ More details about partnerships can be found on our [website](#).

¹⁰¹ More details [here](#)

¹⁰² To know more visit [Fruit and Vegetables Technical Committee](#)

¹⁰³ This [organization](#) was created by the Ministry of Commerce, Industry and Tourism in 2008 with the aim of promoting competitiveness in the industry while supporting Colombian companies to improve indicators in production processes such as quality, human capital and productivity.

Product innovation

[ESRS S4-4]

We aim to ensure the best value proposition in each of the markets where we operate, to meet the needs and preferences of the consumers who trust our stores every day, while promoting product innovation and fostering healthier and more responsible consumption patterns. Additional information on our approach to business is available in chapter 1. “The Jerónimo Martins Group” of this report.

Launches

Our product development priorities aim to position our Private Brands as the most relevant for consumers. These are some of the key principles we follow when launching a new product:

- Only launch products that have a better nutritional profile than the benchmark, which includes carefully selected ingredients and healthier recipes, and that receive very positive feedback from sensory panels.
- Pay special attention to the needs and preferences of children and other groups with specific needs, such as consumers with dietary restrictions.
- Regular review plans for product viability in the market, grounding commercial decisions on market research and product quality, nutritional and safety decisions on the most updated internal and external data.

References launched

	Poland*	Portugal**	Colombia***	Total
Gluten-free ****	15	77	11	103
Lactose-free	0	7	1	8
Vegan and vegetarian	17	8	1	26
Organic	2	11	1	14

* Biedronka Private Brands and perishables.

** Pingo Doce and Recheio Private Brands and perishables.

*** Ara Private Brands.

**** References bearing a label that guarantees a gluten-free composition (in Poland).

Total references

	Poland*		Portugal**		Colombia***		Total		
	2024	2023	2024	2023	2024	2023	2024	2023	Δ 2024/2023
Gluten-free ****	131	109	1,318	1,411	12	1	1,461	1,520	-3.9%
Lactose-free	28	26	47	49	13	12	88	87	+1.1%
Vegan and vegetarian	154	156	33	39	1	-	188	195	-3.6%
Organic	51	52	91	99	1	-	143	151	-6.0%

* Biedronka Private Brands and perishables.

** Pingo Doce and Recheio Private Brands and perishables.

*** Ara Private Brands.

**** References bearing a label that guarantees a gluten-free composition (in Poland).

Poland

Biedronka launched 71 new Private Brand products that encourage the adoption of healthy eating habits. Of these, 25 under the Go Active brand, aimed at consumers with an active lifestyle. The Company also introduced 14 new references in the vegan and vegetarian categories, most of them under the Go Vege brand, which are produced without GMOs and in compliance with legally-required criteria on vegan food¹⁰⁴.

New launches also included the first Private Brand slow-cooked product for children and younger consumers, under the Głodniaki brand. This ready-made range was designed to help retain nutritional properties, avoid the use of preservatives and extend product shelf life.

Vegan products at Hebe

Hebe is committed to continuously launching new vegan products and products containing mostly natural ingredients under the Hebe Naturals brand.

In 2024, Hebe launched 62 new vegan cosmetic products, bringing the full vegan range to 151, and 16 Hebe Naturals products containing at least 92% of natural ingredients by net weight, bringing the total portfolio of products with these characteristics to 29.

Portugal

Pingo Doce and Recheio launched 50 innovative Private Brand references, such as:

- 16 Go Active products targeting consumers who prefer diets rich in protein.
- 3 references under the Pura Vida brand which offers products to consumers with specific needs such as gluten-free, lactose-free or Omega-3 enriched products.
- New vegan sausages by Pingo Doce and new vegan meatballs and croquettes from the Amanhecer brand.

Colombia

In 2024, Ara launched its first vegan product, a balsamic vinegar under the Arrivare brand. The Company expanded the De Mi Casa brand range with four new pre-cooked gluten-free arepas (a traditional flatbread made of ground maize dough stuffed with a specific filling), having no artificial colourings or added salt in their recipe.

The BEM brand (formerly Bien Vida) launched a gluten-free quinoa and rice toasted bread. The brand offers products made with high nutritional standards, allowing Ara to reduce the legal obligation to use warning symbols on products with high amounts of salt, sugar, sweeteners or fat.

Reformulations

[ESRS S4-4]

[GRI 416-1]

Our nutritional reformulation strategy prioritises foods that:

- are mostly consumed by children;
- contain high levels of salt, sugar, fat, saturated fat and/or unnecessary additives;
- are highly consumed and, as such, their reformulating might have a material positive impact on public health;
- although they might be perceived as being healthy by the consumers, their nutritional profile needs to be adjusted;
- are low in fibre, vitamins and minerals;
- have ingredients that could potentially cause allergic reactions.

In 2024, the recipes of 58 food products were reformulated (including perishables). These reformulations prevented the use of 576 tonnes of sugar, 169 tonnes of fats (45 tonnes of fat and 125 tonnes of saturated fat) and 60 tonnes of salt.

We also added fibre content to six products (one in Poland and five in Portugal), to over 13 tonnes.

¹⁰⁴ The claims regarding suitability for vegan consumption must meet certain criteria, such as compliance with the Polish Agriculture and Rural Development Regulation on food labelling, which allows products whose production process does not include animal-based ingredients to be labelled "Certified Vegan" or "Suitable for Vegans"; good production practices so as to minimise cross contamination with non-plant-based ingredients; and to be GMO-free.

Nutritional reformulations [*]	Biedronka	Pingo Doce	Recheio	Ara	Total
Number of reformulated products^{**}	24	13	3	18	58
Salt (references)	15	0	0	14	29
Sugar (references)	7	7	3	8	25
Fat (references)	5	6	0	0	11
Saturated fat (references)	1	6	0	7	14
Quantities avoided (tonnes)^{***}					
Salt	46.9	0	0	13.2	60.1
Sugar	453.8	25.0	3.7	93.1	575.6
Fat	32.5	12.1	0	0	44.6
Saturated fat	24.5	8.0	0	92.1	124.6

^{*} Includes perishables.

^{**} A product may have its recipe reformulated in more than one ingredient; a single counting method, as opposed to reference counting, is used for the purpose of providing transparency about the number of interventions.

^{***} The number of tonnes removed is obtained using the following calculation method: the quantities of the ingredients present in the recipes of the covered references multiplied by the number of units of the considered references sold in the year.

Poland

The focus on reducing salt was directed towards ready-made meals, namely the lasagna Danie Express, and Salato and Go Vege salads and vegetables slices, respectively. In these cases, Biedronka prevented the use of more than 25 tonnes of salt. The sugar content of two references of Madero ketchup was reduced on average by 25% (almost 371 tonnes of sugar avoided) and the saturated fat from the mini cookies from the Bonitki brand, mostly consumed by children, was reduced by more than 80% (almost 25 tonnes of saturated fat avoided).

Biedronka's commitment to "clean" labelling has been reinforced by the ongoing removal of superfluous thickeners, such as guar, xanthan and locust bean gum (from the carob tree), smoke flavour, and sweeteners, namely aspartame and acesulfame K.

Portugal

Pingo Doce has replaced ordinary sea salt with iodised salt in all its soups. The Portuguese Directorate-General for Health has advised that the use of iodised salt is a preventive measure against iodine deficiency, especially in vulnerable groups such as pregnant women and children up to two years of age.

The recipes for Pingo Doce and Amanhecer breakfast cereals and Pingo Doce yoghurts, products mainly consumed by children, have been reviewed and the sugar content has been reduced by between 12% and 49% (almost 25 tonnes of sugar avoided). Fat and saturated fat have been removed from 12 Pingo Doce yoghurts (more than 20 tonnes of fats avoided).

The sorbate potassium preservative has been removed from Masterchef light fresh cheese and all animal ingredients have been removed from Amanhecer cooking cream margarine ensuring it is now a plant-based product.

Progress on the commitments made by Pingo Doce under the Portuguese government's Integrated Strategy for the Promotion of Healthy Eating (EIPAS) can be found on our corporate website.

Wholegrains as breakfast cereals’ main ingredient

Our Portuguese Companies have reached the target of having 100% of breakfast cereals containing wholegrains as their main ingredient two years ahead of our own deadline. In Poland, Biedronka’s progress reached 92% of the eligible products (44 references out of 48, which includes products that, in practice, contain whole grain as the main ingredient but are not labelled as such in the ingredient list).

This has been an outcome of the straight cooperation process of with our suppliers to review recipes, specifically to use wholegrains (wheat, oats, barley, rye and rice) as the first ingredient. Corn-based cereals were excluded of this process.

The option for these products has nutritional benefits for consumers. Wholegrain cereals can contain more nutrients than refined ones, including more fibre.

Colombia

Six BEM products have been reformulated to cut artificial colourings and the Sonelo margarine had a 33% decrease of hydrogenated fats (almost 62 tonnes of fat avoided). Regarding children’s products, Ara has revised the recipes for its Bubu fruit jams. These products are made with 100% fruit, have no added sugar and are preservatives and colorants-free (15 tonnes of sugar avoided). In Ara’s Private Brand cosmetics, several components that could potentially harm consumers have been removed from six products.

Certified ingredients, products and packaging

[ESRS S4-4]
[GRI 417-1]

We work with our suppliers to promote greater responsibility throughout the value chain. One of the actions we promote is the adoption of sustainability certification for the Private Brand and perishable products we sell. These certification systems, managed by external, independent bodies, ensure compliance with environmental and/or social requirements and can be applied to one or more ingredients, the product itself and its packaging.

These certifications ensure that good environmental practices have been implemented in the value chain (e.g., they guarantee that there has been no deforestation or conversion of High Conservation Value ecosystems, or that the production processes for mitigating pollution are best in class) and confirming that human rights have been respected (e.g., the absence of child labour or forced labour, or that fair payment has been made to the producer).

We also recognise the importance of having specific symbology of each certificate at the point of sale to raise consumer awareness of the sustainability features that differentiate these products from apparently similar ones.

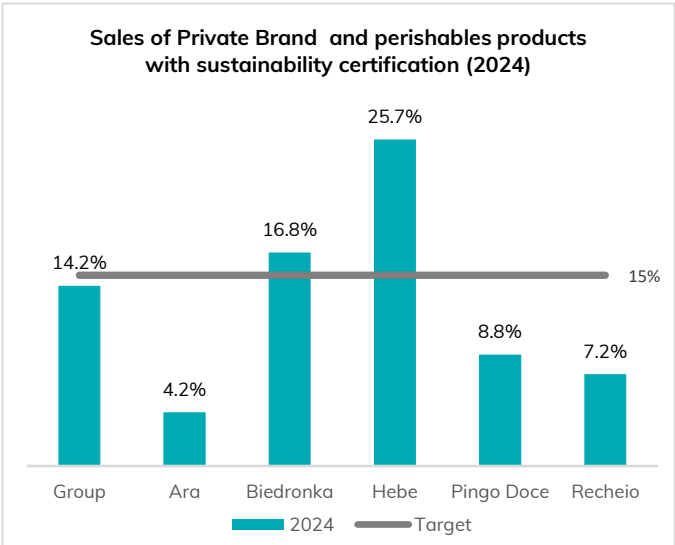
Having exceeded our 2023 goal of ensuring that at least 7% of sales of Private Brand and perishables products and/or packaging have sustainability certification, we set ourselves a new target of 15% for the period 2024-2026.

In 2024, 14.2% of sales in these categories came from products and/or packaging with sustainability certification, 0.8 p.p. more than in 2023.

In 2024 we reached 1,831 references with certification schemes, an increase of 23% comparing to 2023. Detailed information about certification type and Company is available on our corporate [website](#).

The greatest incidence of certification lies in:

- Paper and wood fibres from sustainably managed forests, being FSC® and PEFC the most common ones;



- OEKO-TEX Made in Green for textile products which ensure both social and environmental best practices are implemented;
- Organic certification of food products;
- Animal welfare WelfairTM.

To achieve the 15% target, our teams will continue to work to promote responsible practices' adoption amongst existing suppliers and to identify new suppliers that comply with these practices, while ensuring that most of our consumers have access to products with these characteristics, thus guaranteeing their democratisation. In 2024, we launched 556 products with sustainability certification thanks to our efforts to identify suppliers who meet these certification requirements and to work with them.

We are also committed to promoting the circularity and extension of our products' life cycle. As part of our 2024-2026 sustainability commitments for Biedronka, we ensured the extension of products' warranty to three years in eight electric and non-electric non-food categories. Out of 405 products in scope, 395 now come with an extended warranty, covering 98% of the commitment scope.

This initiative enhances consumer confidence while aligning with our broader efforts to reduce environmental impact by keeping products in use for longer periods of time. Beyond warranty extensions, we continue to explore initiatives that support product circularity, including responsible recycling partnerships and consumer awareness campaigns on sustainable product use. Together, these efforts reinforce our commitment to a circular economy and a more responsible retail model. More information on these initiatives is described in subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy".

Product affordability

[ESRS S4-4]

The year 2024 was characterized by a challenging global and economic context, driven by geopolitical tensions, the social effects of extraordinary price inflation experienced in recent years and the current food deflation, rising costs in production, and increasing competitive dynamics¹⁰⁵. As a result, we have maintained our strategy on providing accessible products to consumers, in order to democratise the access to safe and high-quality food, always aiming to have the best prices in the countries where we operate. The Group's Companies have the purpose of guaranteeing their customers' preference, always focussed on offering the lowest prices without compromising quality in each market.

To ensure the robustness of our offer, and ultimately to prevent and mitigate the impact on consumers purchasing power and accessibility to quality products, we have implemented a series of measures across all our banners. A detailed explanation of each Company's strategy is available in chapter 2 "Management Report", subchapter 2.3. "Performance of the business areas" of this Annual Report.

Some of the most relevant actions are presented by Company below.

Research

- Market and customer research studies, focusing on the social and economic state of our geographies, customer satisfaction, competitors' tactics, as well as sales analyses, give us valuable insights to continuously place our brands as simultaneously price-attractive and affordable, and of high quality and safe.

Supplier engagement and category management

- Supplier management procedures, that aim at ensuring differentiation of our products and services through price, quality and safety standards in place.
- Category management procedures, that focus on continuous improvement of our product portfolio.

¹⁰⁵ For more detailed information regarding the global context and its impact on the Companies, and the specific actions taken to safeguard the brands with fair and accessible prices, please refer to chapter 2 "Management Report", subchapter 2.1. "2024 Context".

Marketing initiatives

Biedronka

- “Nobody cares about their customers’ wallets as much as Biedronka” campaign, which reduced the prices of more than 400 products.
- Maintenance of more than 4,000 regular prices, despite the return of VAT on basic food products in April.
- Service counters for butchers and delicatessens in more than 1,300 stores.
- Moja Biedronka app reached 13 million users.
- 60 promotional campaigns throughout the year.

Pingo Doce

- The ‘My Pingo Doce’ app was an important savings tool, offering exclusive and personalised advantages to its users through initiatives such as “Poupa Shaker” (Save Shaker), “Clube do Bebê” (Baby Club), and “Clube do Vinho” (Wine Club), and other loyalty and savings initiatives with partners across various sectors, such as fuel, educational supplies, and travel.
- Opening of 40 more Comida Fresca restaurants, for a total of 237, offering a very varied and complete range of ready meals for all families at affordable prices.
- Pingo Doce’s loyalty contests that raised awareness and leverage the economic context, offering daily prizes worth over €1,500.
- 54 promotional campaigns throughout the year.

Ara

- Weekly promotions and low prices every day.
- Daily discount marathons “Super Hits”.
- Launch of the “Aguinaldo” scratch cards, with offers of **vouchers to spend on products in Ara shops campaign**.
- “En Ara Sí te alcanza para TODO” as the claim of a campaign offering extra savings opportunities on various products, and reinforcing the overall perception of price.
- 30 promotional campaigns throughout the year.

Recheio

- 54 promotional campaigns throughout the year.

Hebe

- 86 major promotions during the year,
- Up to 150 top selling products at constantly low prices during the year,
- Third edition of the Hebe Quiz, an activity dedicated to our customers with over 17,000 prizes available through the mobile app. The campaign reached around 1.08 million users visiting the Quiz landing page in the mobile app.
- 2nd edition of the Hebe Mobile App Days in Slovakia and the Czech Republic offering customers the opportunity, under minimum purchases conditions, to purchase a product for 1 Kc or for 1 cent.

We evaluate the effectiveness of our actions through internal studies that benchmark our prices and assortment against those of our competitors and through our regular management meetings that include all relevant areas of expertise to reach our business goals whilst providing our high-quality products at affordable prices. Additionally, we indirectly measure the affordability of our value proposition by analysing sales performance.

The Group’s main targets to foster affordability while sustaining our long-term vision to democratize the access to quality and safe products to consumers, are intrinsically connected to our value-creation business strategy and accompany our daily activities:

- Continue to follow a scale-economy strategy in order to create value for both the business and consumers.

- Ensure product quality, safety and great taste at the best price.
- Making impactful customer sales experience and a sense of belonging with consumers.
- Ensure advertising reaches our consumers and is relevant for their priorities and expectations.
- Acquire new customers, retain existing ones and recover lost clients.
- Continuously improve our products and services, aiming at maintaining/gaining market leadership.

Commitments

[ESRS 2 MDR-T, ESRS S4-5]
[GRI 3-3]



The Group's commitments related to consumers and end-users can be found in subchapter 6. "Sustainability commitments", of this chapter.

4.3. Workers in the value chain

Responsible labour management in the value chain

[ESRS 2 S2-2; ESRS 2 S2-3; ESRS 2 S2-4]
[GRI 414-1; GRI 414-2]



Social Audits

Under our social audit programme, we assess our perishables and Private Brand suppliers as to the prevention and mitigation of potential risks of human and labour rights violations, thereby establishing direct contact with workers in the value chain.

Suppliers thus have access to specialised support on social and labour issues and are better prepared for due diligence obligations in their operations and with their own suppliers, leveraging their ability to expand into countries with more demanding labour requirements.

We select suppliers for social audits based on purchase volume (annual volumes of over one million euros) and an evaluation matrix associating products and risk countries¹⁰⁶. These supplier audits assess over 125 requirements across 12 dimensions, which include: preventing child and forced labour. preventing discrimination. safeguarding the right of association. contractual terms. working hours. salaries and benefits. health and safety at work. emergency preparedness. among others, existing criteria that we consider to be of "zero tolerance"¹⁰⁷.

We have established three audit schemes that incorporate aspects adapted to high-risk social sectors: primary production, operations at sea and the manufacturing industry. These audits have been financially supported by the Group since the start of the programme.

Besides checking the documents provided by management and carrying out a site inspection, interviews are conducted with workers in the value chain to triangulate information and rule out any doubts or suspicions identified during a site visit.

There are two types of employee interviews: individual and group. The selection of interviews prioritises:

- groups that are considered potentially vulnerable (i.e. young and older adult groups, migrant workers, workers on temporary contracts, pregnant workers, and people returning from sick leave);
- workers observed during the visit in a potential risk situation;

¹⁰⁶ This risk matrix considers the findings of previous audits, where applicable, and we use an international data source (List of Goods Produced by Child Labor or Forced Labor, published by the Bureau of International Labor Affairs, an operating unit of the United States Department of Labor). The latter is informed by surveys conducted by foreign governments in conjunction with the International Labour Organisation, site visits and data collected by the Bureau of International Labor Affairs (ILAB) team, and also quantitative and qualitative studies carried out by various governmental and non-governmental entities, including academic institutions. To learn more, visit the [ILAB website](#).

¹⁰⁷ There are up to 26 specific criteria depending on the scheme used - primary production, operations at sea and the manufacturing industry - and these concern the prohibition of child labour and proper age control; the prohibition of forced labour and the existence of an employment contract with clear expectations of duties and remuneration; the guarantee of freedom of movement by prohibiting the retention of workers' documents; compliance with the maximum number of working hours and the obligation to grant rest days, remuneration and an auditable record of this; the prohibition of acts of discrimination; existence of labour insurance, equipment and emergency assistance mechanisms (medical or firefighting), among others. In the specific cases of audits for primary production or operations at sea, due to the specificities of migratory contexts and seasonality, these criteria include ensuring proper repatriation in cases of contract termination.

- workers belonging to the company's age and gender averages as a means of representing the majority of the supplier's workforce.
- In these interviews, topics related to the existence or use of Personal Protective Equipment (PPE), understanding the clauses in employment contracts, or the payment of overtime are often addressed. Interviews are always conducted abiding by the principles of confidentiality and non-retaliation.

Over 420 people employed by our partners were interviewed during the 19 audits performed in 2024, the findings of which are detailed in subchapter 5. "Governance", section 5.2. "Managing more sustainable supply chains", subsection 5.2.1 "Selection and monitoring of suppliers".

Communication channels are also made available to these workers, such as the Ethics Committee and those provided for in our Whistleblowing Policy. A detailed description of these channels is provided in subchapter 5.2. "General disclosures", section 5.2.7 "Communication channels", of this chapter.

As part of the social audits, four training courses were held in 2024, covering:

- an understanding of human and workers' rights;
- analysis of the policy and regulatory environment in the world, particularly in Europe, focusing on social issues that will impact the Group and its value chain;
- our policies and codes that set social requirements for our suppliers;
- the mechanisms available to suppliers and workers in the value chain for reporting wrongdoing;
- the criteria and procedures for social audits.

We believe this is key to contributing to the commitment to eradicate forced labour across supply chains and promote decent working conditions, in line with the International Labour Organization and the principles of The Consumer Goods Forum, where "every worker should have freedom of movement, no worker should pay to work and no worker should go into debt to work or be coerced into it".

Supplier quality and safety audits

In addition to social audits, we also conduct quality and product safety audits, which also assess labour-related aspects such as workplace hygiene and safety conditions, training, the use of appropriate clothing, hand-washing equipment, rules of conduct and personal hygiene.

Our Sustainable Sourcing Policy and Code of Conduct provide for the possibility of immediately ceasing business relations with suppliers whenever we become aware that these, or their respective suppliers, are in violation of human, children's and/or workers' rights or do not incorporate ethical concerns in carrying out their activities.

A detailed description of these auditing processes is provided in subchapter 5. "Governance information", section 5.2. "Business conduct", subsection 5.2.1 "Selection and monitoring of suppliers".

Sustainability certification



As a complement to the initiatives carried out with our suppliers, we encourage the adoption of sustainability certifications that follow benchmarks with environmental and/or social requirements that are confirmed by external entities.

With the help of skilled auditors, the adoption of a certification scheme ensures that good social practices have been implemented throughout the value chain of our Private Brand and perishable products. Among other aspects, sustainability certification ensures that human rights principles have been respected (confirming the non-existence of child labour or forced labour) and that producers are paid fairly, thus serving as mechanisms for preventing negative material impacts on workers in the value chain.

Particularly of note, among other aspects, is the social and labour component implicit in the certification of Private Brand products and perishables by the RSPO (Roundtable on Sustainable Palm Oil) and the RTRS (Round Table on Responsible Soy Association).

RSPO certification establishes social criteria in palm oil production, including¹⁰⁸:

- respect for human rights and human rights defenders;
- the existence of a mutually-agreed system between Jerónimo Martins and the supplier to receive complaints from affected parties;
- the prohibition of forced labour, child labour, any form of discrimination, harassment or abuse in the workplace;
- respect for the right to freedom of association and collective bargaining;
- contractual conditions in line with the legal minimum and adequate pay that affords a decent living.

RTRS certification includes the verification of social criteria in soy production¹⁰⁹, in particular:

- prohibition of forced labour, human trafficking, child labour, discrimination, harassment or abuse in the workplace;
- fair pay and equal opportunities;
- the existence of an effective channel for reporting complaints/abuse;
- respect for labour laws: union agreements and direct employment contracts specifying payments and employment conditions (wages and benefits, number of hours worked) available in the languages understood by the workers;
- the existence of procedures, tools and training for employees relating to health and safety at work;
- respect for the right to freedom of association and collective bargaining.

Specific symbols and labelling is used on packaging to facilitate the communication of these attributes to consumers, raising their awareness and encouraging them to opt for certified products. We also promote the certification of these commodities throughout our supply chain. For instance, the palm oil used as an ingredient in our Private Brand products and perishables in Portugal and Poland, which is 100% certified according to RSPO criteria. We also promote RTRS or Proterra certification for soy, most of which is present in the feed given to animals and which, due to its indirect presence, is not communicated at the point of sale.

More information on sustainability certification is provided in subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", of this chapter. More detailed information on RSPO and RTRS certification in our supply chain is provided in subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", of this chapter.

¹⁰⁸ To find out more about RSPO criteria, visit the organisation's website at www.rspo.org.

¹⁰⁹ To find out more about RTRS criteria, visit the organisation's website at responsiblesoy.org.

5. Governance information

5.1. Our business conduct policies

[ESRS 2 MDR-P; ESRS G1-1]

[GRI 2-16; GRI 2-23; GRI 2-24; GRI 2-25; GRI 2-26]

Cultivating strong relationships with our suppliers is paramount for us to achieve our daily mission: making sure our customers have access to quality products at affordable prices. By fostering these relationships, we are better positioned to continue our work on promoting healthy eating habits based on a sustainable development model. These values set the foundation of our strategy and procurement activities.

Our business conduct emphasises the way we work, with honesty, rigour and integrity, and is supported by the following policies and procedures, which are available [here](#):

- Code of Conduct
- Anti-Corruption Policy
- Whistleblowing Policy
- Sustainable Sourcing Policy
- Code of Conduct for Suppliers

We have zero tolerance for corruption or fraud, and we are uncompromising when it comes to any violation of our Code of Conduct, our Anti-Corruption Policy and the rules established in the laws laid down by the European Union and the countries in which we operate. A detailed description on these policies can be found in subchapter 2. “General disclosures”, section 2.6. “Our policies”, of this chapter.

Detailed information on specific Governance disclosure requirements listed in ESRS can be found in the sections of this report indicated in the table below.

Disclosure requirement	Section of the Report
Description of our business conduct policies.	Chapter 5 “Sustainability Statement”, subchapter 2. “General disclosures”, section 2.6. “Our policies”.
Control mechanisms and procedures applicable to reporting of irregularities and to related party transactions.	Chapter 4 “Corporate Governance”, section C “Internal Organisation”, subsection II “Reporting of Irregularities” and section E “Related Party Transactions”.
Mechanisms in place to facilitate the communication, from internal and external stakeholders, and resolution of potential negative impacts arising from our activities.	Chapter 5 “Sustainability Statement”, subchapter 2. “General disclosures”, section 2.3. “Stakeholder engagement and communication channels”.
Animal Welfare policy, actions and targets.	Chapter 5 “Sustainability Statement”, subchapter 3. “Environmental information”, section 3.2 “Managing environmental topics”, subsection 3.2.4. “Biodiversity and ecosystems”, point “Animal welfare”.
Reporting of complaints made by employees through the Ethics Committee, Ethics Offices, Local Committees and the Employee Service Department in the management of employment issues.	Chapter 5 “Sustainability Statement”, on subchapter 2. “General disclosures”, section 2.3. “Stakeholder engagement and communication channels”, on subchapter 4. “Social information”, section 4.2. “Managing social topics”, subsection 4.2.1. “Own workforce”, point “Ethics and compliance”, and on subsection 4.2.1. “Workers in the value chain”.
Due diligence on the prevention and potential remediation of human and labour rights risks.	Chapter 5 “Sustainability Statement”, subchapter 3. “Environmental information”, section 3.3. “Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)”, subsection 3.3.5. “Minimum safeguards”.
Responsibilities and operation of the functional areas responsible for managing business conduct and other aspects relevant to business continuity, such as risk identification.	Chapter 4 “Corporate Governance”, Part I – “Information on Shareholder Structure, Organisation and Corporate Governance” and in the “Investor” channel of the Group’s corporate website .
Training within the organisation on business conduct.	Chapter 5 “Sustainability Statement”, subchapter 4. “Social information”, section 4.2. “Managing social topics”, subsection 4.2.1. “Own workforce”, point “Ethics and compliance”.

5.2. Business conduct

[GRI 2-6; GRI 3-3; GRI 308-1; GRI 308-2; GRI 407-1; GRI 408-1; GRI 409-1; GRI 412-3; GRI 414-1; GRI 414-2; GRI 416-1]

Building strong partnerships with our suppliers contributes towards better value chain management while mitigating the risks associated with potential disruptions. We prioritise establishing business relationships with those suppliers grounded on ethical, social and environmental principles¹¹⁰, thus mitigating the risks of shortcomings in product quality and availability, lack of financial liquidity throughout the supply chain and tense and/or inappropriate negotiation practices. By partnering with suppliers that share our values, we are working together to help achieve the United Nations' 2030 Agenda.

5.2.1. Selection and monitoring of suppliers

[ESRS 2 MDR-A; ESRS 2 MDR-M; ESRS G1-2]



To ensure compliance with the principles set out in our Corporate Responsibility policies¹¹¹, we conduct selection and regular audits of potential and current suppliers for perishables and Private Brand. Selection audits aim to ensure that potential suppliers are aligned with our principles and regular audits allow our Companies to monitor process management, systems management and product formulation.

Supplier selection audits establish minimum requirements that potential suppliers must meet in order to do business with our Companies. Suppliers that do not meet these criteria are not selected and receive information regarding the areas that need to be improved for them to be considered in the future.

For suppliers already working with our Companies, and whenever they are unable to meet the criteria of the regular audits, a corrective action plan is agreed and put in place to enable continuous improvement, the progress of which is monitored together with the suppliers. If suppliers fail to comply with the corrective action plan and/or are unwilling to implement it, action is taken, such as suspending the partnership until confirmation that the identified nonconformity has been remedied, or even terminating the business relationship between the parties.

We conduct three types of audits: food safety and quality, environmental (which also includes our service providers) and social.

Food safety and quality audits

Food safety and quality audits are carried out not only in our selection processes of new perishables and Private Brand suppliers¹¹², but also in the monitoring of current suppliers in the development and production stages. These audits evaluate, among other things, hygiene and food safety conditions, traceability and labour-related aspects¹¹³. The frequency of audits is defined based on criteria that determine the supplier's performance, taking into account:

- the level of perishability of the product and/or the history of risk assessments per supplier;
- the results of analytical checks, rejections and complaints;
- the results of previous audits;
- the existence of food safety certification systems, under the schemes approved by the Global Food Safety Initiative.

¹¹⁰ These principles are set out in the Jerónimo Martins Group's Sustainable Sourcing Policy, Code of Conduct for Suppliers, Code of Conduct and Anti-Corruption Policy available on our [website](#).

¹¹¹ The Group's Corporate Responsibility policies, such as the Nutrition Policy, the Product Quality and Safety Policy, the Environmental Policy, the Sustainable Sourcing Policy and the Code of Conduct for Suppliers, are available on our [website](#).

¹¹² In the case of new suppliers with food safety certification systems approved by the Global Food Safety Initiative, a selection audit is not required unless the risk presented by a Private Brand supplier is above "Low". The Global Food Safety Initiative is a coalition of The Consumer Goods Forum that assesses food safety management systems in supply chains with the aim of ensuring a reliable supply of safe food products to consumers. Several schemes are recognised by this initiative, including British Retail Consortium (BRC), Global Good Agricultural Practices (Global G.A.P.), HACCP/Codex Alimentarius, International Featured Standards (IFS), Food Safety System Certification (FSSC) 22000 and ISO 22000.

¹¹³ Labour-related aspects, which account for 10% of the assessment, are related to the quality and safety of products, and the audits assess elements such as health and safety working conditions, training, the use of appropriate clothing, hand washing equipment, rules of conduct and personal hygiene, the existence of adequate social areas, changing rooms, and employee bathrooms.

The outcome of this assessment determines that suppliers with a score of “Basic” are audited/visited at intervals of no more than 6 months. Those who scored “High” are audited/visited at least every 12 months, and for those that achieve a score of “Excellent” a longer monitoring window is allowed, which may be up to 36 months.

Food safety and quality audits of perishables and Private Brand suppliers*

Colombia	2024	2023	Δ 2024/2023
Perishables	209	233	-10.3%
Private Brand – food and non-food	245	226	+8.4%
Poland			
Perishables**	1,231	1,401	-12.1%
Private Brand – food and non-food	467	432	+8.1%
Portugal			
Perishables	924	1,008	-8.3%
Private Brand – food and non-food	188	250	-24.8%

* The audits include the following types: selection, control and follow-up.

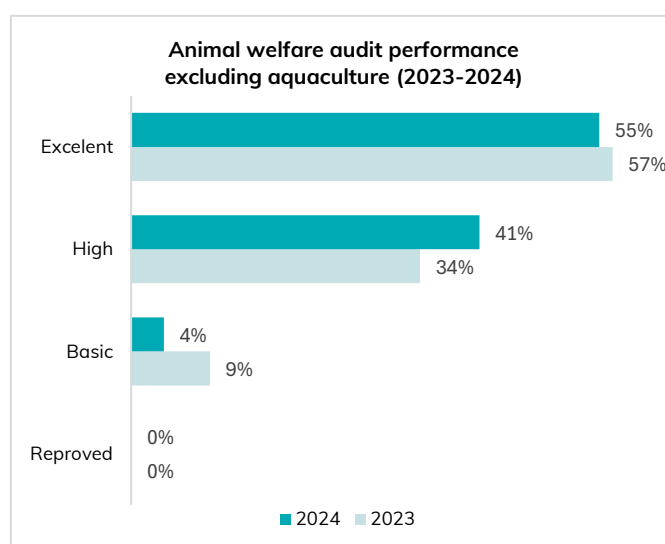
** Includes ad-hoc audits and inspections.

In 2024, the total number of audits reduced by 8% compared to 2023. The decrease in audits in the perishables area in Poland and Colombia, and in the perishables and Private Brands categories in Portugal, is due to the previous good results obtained, which determined a lower frequency of follow-up audits in 2024. The increase in Private Brand audits in Colombia and Poland results from the higher number of potential suppliers which led to more selection audits being carried out.

These audits also include animal welfare criteria for the slaughterhouses (with which our Companies and respective suppliers work) of perishable meat suppliers who own primary farms. The assessed criteria are based on the Global G.A.P. (Global Good Agricultural Practices) framework and on laws in force. General aspects are adapted for different meat categories (with specific conditions for beef, poultry, pork, rabbit and lamb), such as conditions on the farm, feed, transport and stunning. In Poland, egg farms supplying Biedronka are inspected against an internally developed benchmark that assesses animal welfare aspects such as housing conditions, feed, freedom of movement and access to fresh water, among others.

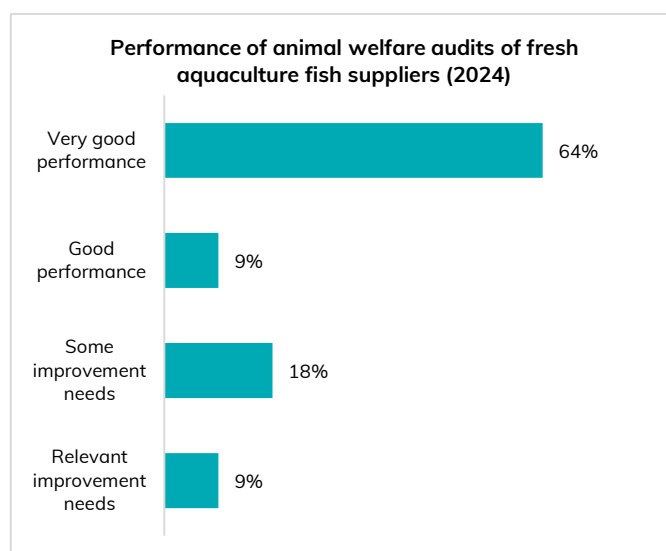
In 2024, these audits were carried out in Colombia and Portugal (primary production and slaughterhouses), and Poland (primary production). A total of 78 audits were carried out, 20% less than in 2023¹¹⁴. As already mentioned, this decrease relates to the good performance registered in previous years, which reduces the need for new follow-up audits.

In Poland, more than 200 inspections of egg farms have been carried out since 2018, achieving the target of auditing 100% of farms supplying Biedronka.



¹¹⁴ This variation was recalculated to include egg farm inspections carried out in both 2023 and 2024.

Additionally, Biedronka initiated the audit of direct suppliers of fresh aquaculture fish according to the Group's Fish Welfare standard, which is based on the aquaculture standard Global G.A.P. (Global Good Agricultural Practices) framework and on laws in force. In total, all evaluated suppliers scored "Very good performance", representing 42% of Biedronka direct suppliers of this category. In Portugal, 100% of fresh aquaculture fish were evaluated for these topics as around 70% of fresh aquaculture fish suppliers are Global G.A.P. certified and the remaining 30% were included on the animal welfare audits coordinated by our Companies. Of these, only one was identified as needing relevant improvement. A correction plan was shared with this supplier and a follow-up audit will take place.



In 2024 we also worked with broiler chicken and turkey suppliers in Portugal to promote their certification in accordance with the Welfair™ standard. This certification is based on the European Welfare Quality and AWIN® standards and evaluates and monitors the quality of animal welfare on farms, in rearing areas and in slaughterhouses. As a result of the collaboration efforts, we ended the year with 100% of our suppliers of perishable and Private Brand broiler chicken and turkey with a third-party Welfair™ certification.

Environmental audits

In the scope of our environmental audits, we assess requirements related to environmental certification and management related to topics such as energy, water, packaging, effluents, waste, emissions and hazardous substances. The environmental performance of our perishables, Private Brand and service providers is assessed both at the time of selection and during the business relationship. For selection audits, environmental criteria are given the same weight as the food safety and quality audit items, reinforcing the relevance of environmental aspects at the time of supplier approval. In 2024, 179 new suppliers were assessed and approved after meeting both criteria.

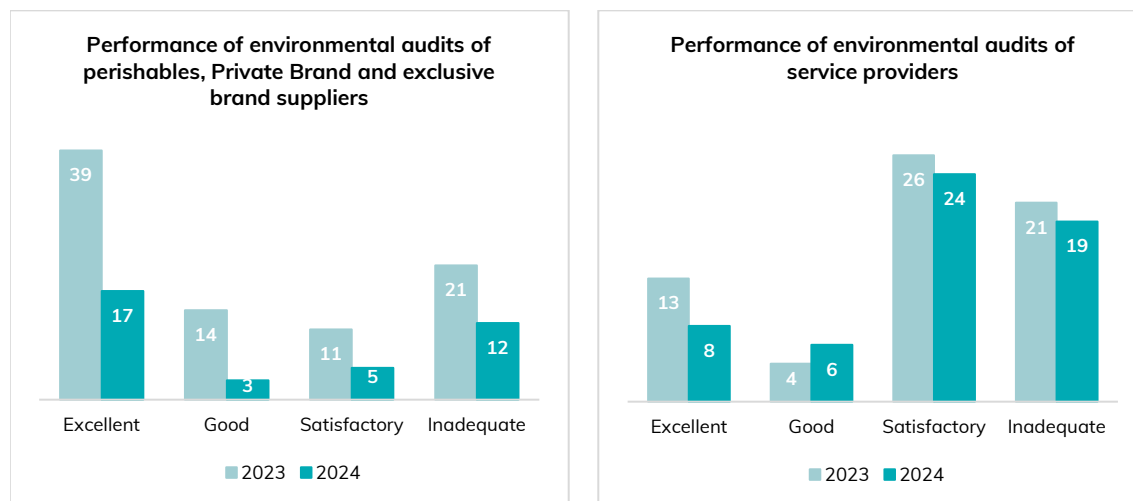
Regular environmental audits of our perishables and Private Brand suppliers are carried out by an external entity. For service providers, audits are conducted by internal auditors. In 2024, and for the first time, perishables and Private Brand suppliers were assessed according to a risk scale that considers the suppliers' environmental audit history and the environmental risk of the country of supply. In the case of service providers, priority is given to those whose activities may have higher environmental impacts¹¹⁵.

Around 100 requirements are assessed and supplier performance¹¹⁶ is categorised in four levels: Excellent, Good, Satisfactory and Inadequate. The volume of purchases made by our Companies (more than one million euros per year) and the significance of the environmental impact of suppliers' activities are among the criteria to select the suppliers and service providers that must undergo these audits.

¹¹⁵ Production and supply of equipment, transportation, refrigeration and HVAC (heating, ventilation and air conditioning), waste management operators, installation and maintenance of treatment systems, and printing shops.

¹¹⁶ Assessment scores are determined as follows: (i) Excellent: compliance with 100% of the critical requirements and compliance with more than 94% of the Satisfactory level requirements, plus a compliance of between 71% and 85% with the Good level requirements and at least 70% of the Excellent level requirements, or compliance with 100% of the critical requirements and the existence of a certified environmental management system; (ii) Good: compliance with 100% of the critical requirements and compliance with between 85% and 94% of the Satisfactory level requirements, plus compliance with 70% of the Good level requirements; (iii) Satisfactory: compliance with 100% of the critical requirements and compliance with between 70% and 84% of the Satisfactory level requirements and; (iv) Inadequate: non-compliance with one or more critical requirements and/or compliance with less than 70% of the Satisfactory level requirements.

In 2024, 37 perishables and Private Brand suppliers were audited, including re-audits¹¹⁷. Of the suppliers audited, 11 were ISO 14001 certified, equivalent to an “Excellent” rating. We also audited 57 service providers (20 in Portugal, 25 in Poland and 12 in Colombia).



The reduction in the number of audits conducted in 2024 is related to the selection process of a third-party entity to conduct these external audits. Nonetheless, in 2025 and 2026 audits are scheduled to ensure that the Group meets its three-year targets. For more information on these targets, refer to subchapter 6. “Sustainability commitments”, section 6.1. “Commitments 2024-2026” in this chapter.

Suppliers and service providers with a score of “Inadequate” are given a corrective action plan that requires a response within a maximum of six months. The status of implementation is measured in a second audit, carried out the following year. We reserve the right to suspend cooperation in cases where the corrective action plan is not complied with. Improvement plans are presented in cases where there are nonconformities.

Social audits

Social criteria related to labour aspects¹¹⁸ are included in our food safety and quality supplier selection audits, as described above. Social aspects are further complemented in our regular social audits of perishables and Private Brand suppliers from whom we make purchases of more than one million euros per year.

Our social audit programme allows our Companies to carry out due diligence to assess supplier’s procedures, while preventing and mitigating potential human and labour rights risks, in line with the principles of our Sustainable Sourcing Policy. The programme also allows our partners to gain a better understanding of social issues, minimise risks and ultimately increase their capacity to expand to other countries with more demanding labour requirements.

These audits, carried out by an external and independent entity, are preceded by an explanatory session with our partners, which analyses compliance with national and international laws and considers the best practices shared by The Consumer Goods Forum’s Sustainable Supply Chain Initiative. There are three audit schemes aimed at incorporating aspects related to high-risk sectors: primary production, operations at sea and the manufacturing industry.

Social audits assess over 125 requirements across the following 12 dimensions: prevention of child labour, prevention of forced labour, prevention of discrimination, safeguarding the right of association, contractual

¹¹⁷ Re-audits are new audits of suppliers that obtained a score of ‘Inadequate’ in the first audit. They serve to assess the extent to which the improvement plan has been implemented.

¹¹⁸ Labour related aspects, which account for 10% of the assessment, are related to the quality and safety of products. These audits assess elements such as health and safety working conditions, training, the use of appropriate clothing, hand washing equipment, rules of conduct and personal hygiene, the existence of adequate social areas, changing rooms, and employee bathrooms.

terms, working hours, wages and benefits, health and safety at work, emergency preparedness, compliance monitoring, business ethics, and protection of human rights, including criteria we consider to be of “zero tolerance”.

In addition to the document analysis provided by management and on-site inspections, interviews are carried out with employees in the value chain to triangulate the information. In all audits, a sample representing the average global workforce of the audited company as well as workers from vulnerable groups (such as migrants and under temporary contracts) are interviewed, as well as employees who, during the visit, were deemed as being at social risk.

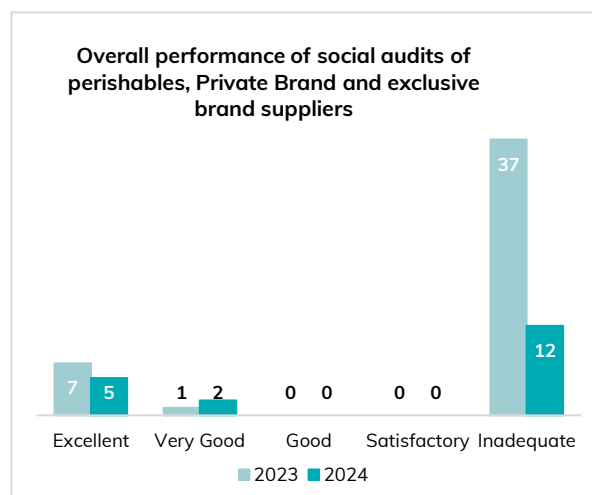
The interviews are conducted considering the worker's specific circumstances and observations made during the visit. The interview always respects the principles of confidentiality and non-retaliation. Additional information on these processes is described in subchapter 4. “Social information”, section 4.2. “Managing social topics”, subsection 4.2.4. “Workers in the value chain”, in this chapter.

Based on the overall score obtained, we have defined five levels of compliance¹¹⁹: Excellent, Very Good, Good, Satisfactory and Inadequate.

In 2024 in-person audits were carried out at 19 direct suppliers. These audits were also based on the suppliers' social risk, as identified in the List of Goods Produced by Child Labor or Forced Labor, per Country, developed by the Bureau of International Labor Affairs (ILAB). Local suppliers in Portugal and Colombia were audited. Eight suppliers classified as “Inadequate” in previous cycles were re-audited and four of them were re-evaluated as “Excellent”. The remaining four maintained an “Inadequate” score.

A personalised corrective action plan was presented to and discussed with all suppliers, where the assessment had identified critical non-conformities requiring a mandatory response within 12 months at the most, depending on the level of severity. During this 12-month period, additional contact is established with the supplier to review progress in the implementation of the plan.

Suppliers with a score of “Inadequate” are regularly contacted to confirm implementation of the corrective action plan. An *in loco* or remote assessment is performed the following year for further evaluation. If there is no evidence of progress, we reserve the right to suspend the business relationship, as defined in our Sustainable Sourcing Policy.



5.2.2. Supplier awareness and training

[ESRS 2 MDR-A; ESRS G1-2]



To promote continuous improvement, in addition to visits and audits, we also provide awareness and training to our suppliers. These are tools to exchange knowledge, which are essential in sharing and defining best practices, common goals and identifying opportunities for product and process improvement. The better our suppliers perform, the better our Companies can meet their sustainability challenges, particularly in supply chain related targets such as scope 3 emission reduction goals.

¹¹⁹ The results of each supplier are measured based on full or partial compliance or non-compliance with critical requirements, general-level requirements and, where applicable, good practice requirements. The five levels of compliance are: (i) Excellent: compliance with 100% of the critical requirements and compliance with at least 95% of the general-level and good practice requirements; (ii) Very Good: 100% compliance with the critical requirements and compliance with between 85% and 94% of the general-level and good practice requirements; (iii) Good: Compliance with 100% of the critical requirements and compliance with between 75% and 84% of the general-level and good practice requirements; (iv) Satisfactory: Compliance with 100% of the critical requirements and compliance with between 65% and 74% of the general-level and good practice requirements; (v) Inadequate: non-compliance, albeit partial, with at least one critical requirement and/or compliance with less than 65% of the general-level and good practice requirements.

In 2024, several training and awareness-raising sessions were held, focusing on a wide range of sustainability-related topics. These included food safety and defence, animal welfare (including aquaculture fish), social and environmental topics in the supply chain, environmental and social audits, carbon footprints throughout the value chain (scope 3 emissions), packaging ecodesign principles, responsible use of pesticides, tackling deforestation and the related European regulation, water management and both sustainable and regenerative agriculture.

More than 2,000 representatives from perishables and Private Brand suppliers participated in these sessions in Portugal, Poland and Colombia.

Promoting sustainable agriculture practices among suppliers

Sustainable agriculture production contributes to reduce impacts in areas such as soil pollution and to preserve ecosystem services, such as those provided by pollinators. At the same time, these practices increase the resilience of production systems, ensuring their economic viability and social development. This is why we developed the Sustainable Agriculture Handbook for our fruit, vegetable and flower suppliers in Portugal. The handbook lists opportunities for improvement in strategic areas such as land use, biodiversity preservation, water and energy efficiency, and the proper use of fertilisers and phytopharmaceuticals. It is also designed to help producers calculate the sustainability index of their farms. In addition, we also provide training for farms that are part of the programme, aligning the methodology used in the handbook with the objectives of the EU's Farm to Fork strategy.

In 2024, we applied the principles of the handbook to 15 new farms in Portugal and reassessed 13 already participating in the project, totaling 28 farms evaluated during the year. The average sustainability index for these new farms was 3.65 (on a scale of 1 to 5, where 5 is the maximum score). During the 2024-2026 period we aim to evaluate at least 60 farms in Portugal.

Re-assessments are usually carried out every two years and, in general, the indicators with the best scores (above 4) are those related to waste management, agricultural practices and soil management. The indicators with the greatest opportunities for improvement are those related to energy consumption.

Since the beginning of the application of the project in 2016, more than 200 farms from 100 suppliers have been integrated. Suppliers, with at least one farm participating in the project, represent 67% of the volume of fruits, vegetables and flowers purchased by our Companies in Portugal.

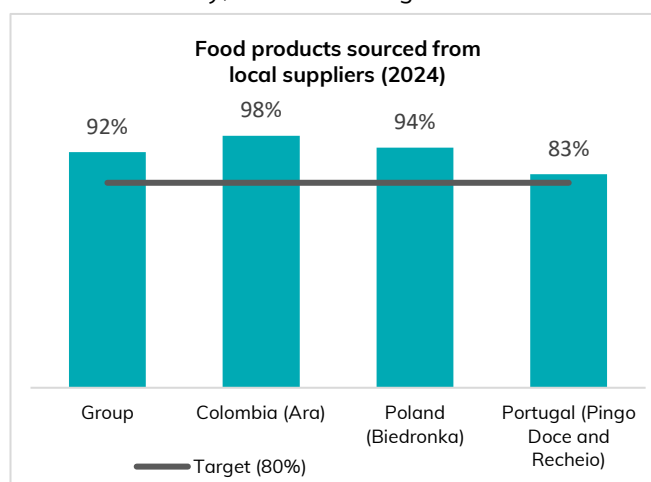
5.2.3. Engaging with local suppliers

[ESRS 2 MDR-A; ESRS 2 MDR-M; ESRS G1-2]
[GRI 2-6; GRI 204-1]



Engaging with local suppliers is crucial to promote the local economy, as it boosts regional businesses and creates job opportunities. Additionally, local suppliers help to simplify the complexity of the supply chain, leading to more efficient processes. By relying on nearby sources, we ensure shorter delivery times, which means our products are fresher and have longer shelf lives, ultimately benefiting both our customers and our overall operations. Shorter distances between suppliers and our operations also help to reduce the carbon emissions associated with transport, particularly by air and sea.

Based on these benefits it is not surprising that in the last decade we have stood firm in our commitment to ensure that at least 80% of the food we sell, in each of the countries where we have mature food distribution operations, is sourced from local suppliers¹²⁰.



¹²⁰ More information on purchases from local suppliers in Private Brands and perishables products, such as meat, fish, fruit and vegetables, bakery/pastry and flowers, is available on our [website](#).

Sourcing from local farmers

In Poland, Biedronka stood firm on its commitment to working with family farms. This programme, launched in 2021, focuses on sourcing directly from small local producers. In 2024, Biedronka signed over 70 new contracts, bringing the total number of active local producers to around 230. The value of such purchases has increased by 45% compared to 2023, reaching over 126 million units of products delivered to the Company's stores.

In Portugal, Pingo Doce acquired more than 14,000 tonnes of nationally grown cherries, apples and kiwis, a similar quantity as in 2023, and reinforced the range of specialised perishables with national products in the vegetable, meat and aquaculture fish categories.

Ara also invested in relationships with local fruit and vegetable producers. In 2024, more than 95% of its purchases in this category were from domestic production.

More information is available on our corporate [website](#).

We also kept consumer communication initiatives highlighting the local and seasonal products sold in our Companies, using different formats such as in-store communication, leaflets, TV campaigns and digital channels. Additionally, we use stickers on Private Brand products to highlight:

- the incorporation of 100% Portuguese raw materials and/or production at Recheio;
- the origin, with the "100% Nacional" (100% Portuguese) sticker at Pingo Doce, "Polski Produkt" (Polish Product) sticker at Biedronka and "Hecho en Colombia" (Made in Colombia) sticker at Ara.

5.2.4. Supplier payment practices and initiatives

[ESRS 2 MDR-M; ESRS 2 MDR-T; ESRS G1-2; ESRS G1-6]

[GRI 2-6]



Regarding payment to suppliers, all Companies have set terms and in line with industry practice and considering the financial sustainability of the respective supply chains. In addition, there are specific programmes targeting smaller suppliers as detailed below.

In the three countries of our food distribution operations (Portugal, Poland and Colombia), which account for more than 99% of the Group's sales, we have specific tools in place to ensure an efficient invoice processing. These tools manage and ensure our compliance with the payment terms and conditions agreed with each supplier, namely: i) electronic communication (EDI) for receiving suppliers' invoices and related documents; ii) a web portal where suppliers have access to information, including the list of invoices to be paid, with notifications in cases where clarifications or actions are required so corrections and/or adjustments may be done promptly to facilitate the payment process.

To help improving the treasury management of smaller food distribution suppliers we have strengthened our supplier finance arrangements. These arrangements enable suppliers to anticipate the receipt of their invoices at competitive cost without affecting their debt rating. By the end of 2024, these programmes were in place in Portugal, Poland and Colombia, covering more than 200 suppliers in each country.

Our food distribution companies also have specific programmes that promote shorter payment terms for smaller suppliers.

In Poland, since the Covid pandemic in 2020, Biedronka has reduced the payment terms to a maximum of 21 days for producers with an annual turnover of less than 100 million złoty (approximately 24 million euros). In 2024, around 260 suppliers benefitted from this initiative, 60 more than in 2023.

In Portugal, there are two programmes in place. The first aims to support small and medium-sized producers that are members of the Confederation of Portuguese Farmers (CAP). This measure, granted under exceptional circumstances, is unique in Portuguese retail and aims to bring forward payment to an average of 10 days, instead of the 30 days established by law for these categories, without any financial costs to the producer. Since 2012, around 375 suppliers have benefited from this initiative. The second programme establishes a maximum payment term of 30 days for all Portuguese small and medium-sized enterprises certified by IAPMEI, the Public Agency for Competitiveness and Innovation. In 2024, all Pingo Doce and Recheio's suppliers identified as certified Portuguese SMEs benefitted from this initiative.

In Colombia, Ara has in place the “Plazos Justos” (Fair Deadlines) programme to shorten the payment terms for smaller suppliers. This initiative targets micro, small and medium-sized enterprises and ensures payment in less than 45 days, with the aim of boosting their cash flow and business productivity. In 2024, approximately 1.170 suppliers participated in this programme.

As previously referred, in addition to our SME-specific payment programmes, our payment terms are agreed with all trade suppliers and set on a General Supply Agreement. These terms may vary depending on type and size of the supplier and/or the category of products supplied. As an example, suppliers of fresh products have shorter payment terms than suppliers of non-food products with low rotation.

Payment terms are set in three categories: i) less than 30 days, ii) between 30 to 60 days, and iii) more than 60 days. In all countries where we operate, most trade suppliers – more than two thirds – are paid between 30 and 60 days (equivalent to 72% of the responsibilities). Information related to the proportion of suppliers' responsibilities being paid according to average number of days is included in chapter 3. “Financial Statements”, subchapter 3.1. “Consolidated Financial Statements”, note 28.2.2. “Liquidity Risk”.

Payments outside this range may apply to specific agreements with suppliers (e.g., as mentioned previously) or in cases where additional information may be needed before payment can be made (e.g., obtain confirmation of supplier's new bank accounts).









During 2024, our Companies have not been involved in legal proceedings related to late payments to trade suppliers.

6. Sustainability commitments










[ESRS 2 MDR-T]

6.1. 2024-2026 commitments



6.1.1. Environment



ESRS topic	Materiality	Commitment	Progress
Climate Change [ESRS E1-4]	 MATERIAL	Reduce the Group's scopes 1 and 2 emissions, in absolute terms, by at least 10% by 2026, compared to 2021. This commitment is aligned with the science-based target for the near-term submitted by Jerónimo Martins to the Science Based Targets initiative.	In progress. In 2024, the reduction in the Group's scope 1 and 2 carbon emissions, in absolute terms, was 19%, compared to 2021.
Climate Change [ESRS E1-4]	 MATERIAL	Reduce carbon emissions resulting from transporting goods to stores by 5% (in tonnes of CO ₂ e per pallet transported) by 2026, compared to 2021.	In progress. In 2024, the reduction in carbon emissions resulting from the transport of goods to stores (in tonnes of CO ₂ e per pallet transported) was 6,1%, compared to 2021.
Climate Change [ESRS E1-4]	 MATERIAL	Engage, in the 2024-2026 period, with at least five of the top 100 suppliers in terms of purchased goods in each company, to collaborate on the definition of strategies for the reduction of scope 3 emissions.	In progress. In 2024, 20 of Biedronka, Pingo Doce and Recheio's main suppliers were contacted as part of our scope 3 emissions reduction plan. By 2026, we will also engage our main suppliers from Ara, Hebe and JMA.
Climate Change [ESRS E1-4]	 MATERIAL	Reduce energy consumption by 10% (per thousand euros of sales) by 2026, compared to 2021.	In progress. In 2024, the reduction in energy consumption, per thousand euros of sales, was 30%, compared to 2021.
Pollution [ESRS E2-3]	 NON-MATERIAL	Ensure that the number of locations with environmental certification is at least 70% of the total number of distribution centres and industrial/similar units*. * including fresh dough factory, central kitchens, soup factory, Terra Alegre dairy factory and packing units.	In progress. In 2024, 73% of distribution centres and industrial units had ISO 14001 environmental certification. In Poland, certification according to the international standard ISO 14001 has been renewed for 17 distribution centres (DCs) and the Biedronka soup factory. In Portugal, fresh dough factory and Terra Alegre maintained ISO 14001 certification, as well as the DCs (Azambuja, Algoz, Vila do Conde, Alfena, Vila Nova da Rainha and Alcochete) and Pingo Doce's central kitchens (Odivelas and Aveiro). In Colombia, Ara has completed the ISO 14001 certification process for the Gachanchipá and Pereira distribution centres.
Water and marine resources [ESRS E3-4]	 NON-MATERIAL	Reduce water withdrawal in distribution activities by 10% (per thousand euros of sales), by 2026, compared to 2021.	In progress. In 2024, the reduction in the volume of water withdrawal in distribution activities, per thousand euros of sales, was 59%, compared to 2021.
Water and marine resources [ESRS E3-4]	 NON-MATERIAL	Define and implement a mitigation and adaptation plan to improve the efficiency of water use and to manage its scarcity during low precipitation periods in JMA units, publicly disclosing its progress.	In progress. In 2024, the JMA Water Management Plan was developed, which defines goals and a set of actions until 2030 for the agri-food business, which aim to prioritise monitoring and limit specific water consumption in the different JMA activities.
Biodiversity and ecosystems [ESRS E4-4]	 NON-MATERIAL	In Colombia, Poland and Portugal support and/or implement, in the 2024-2026 period, at least two nature conservation and biodiversity protection projects, aligned with	In progress. In 2024, the Group supported 11 nature conservation projects (7 in Portugal, 2 in Colombia and 2 in Poland).


ESRS topic	Materiality	Commitment	Progress
Biodiversity and ecosystems [ESRS E4-4]	 NON-MATERIAL	<p>the Kunmig-Montreal Global Diversity Framework, and disclose its results annually.</p> <p>Contribute to the objectives of the Forest Positive Coalition of Action of The Consumer Goods Forum. The following objectives have been set for our Private Brand and perishable products:</p> <ul style="list-style-type: none"> • DCF: By 2025, ensure that palm oil, soy, paper and wood and beef in our Private Brand and perishable products are not associated with either deforestation or conversion of ecosystems (DCF – Deforestation and Conversion Free). • Palm oil: <ul style="list-style-type: none"> ◦ Continue to ensure that 100% of palm oil in Portugal and Poland is RSPO certified and progressively extend this commitment to palm oil derivatives. ◦ In Colombia, ensure compliance with the Colombian government's "Acuerdo de Voluntades para la Deforestación Cero en la Cadena de Palma en Colombia" (Voluntary Agreement for Zero Deforestation in the Colombian Palm Oil Chain), guaranteeing that by 2026, the palm oil of Colombian origin used in Private Brands and perishable products is traceable to the farm where it was produced and is not associated with deforestation, and that 100% of palm oil of non-Colombian origin used in Private Brands and perishable products is certified by the RSPO. • Soy: By 2025, ensure that 100% of direct and indirect soy is traceable at least to the country of origin and that whenever it comes from an origin where the risk is not negligible, the soy is traced back to the municipality of origin and/or has sustainability certification (e.g., RTRS or Proterra). • Paper and timber: Working with suppliers of Private Brand products and perishables to ensure that 95% of the virgin fibres used in our products and 80% of the virgin fibres used in our packaging are certified (FSC® or PEFC) by 2026. • Beef: Ensure that 100% of the beef in our Private Brand and perishable products is traceable at least to the country of origin, and that traceability to the farm of origin is guaranteed for all beef sourced from non-negligible risk countries. 	<p>In progress.</p> <p>In 2024, the Group had the following performance in its Private Brands and perishables:</p> <ul style="list-style-type: none"> • DCF - Deforestation and Conversion Free: the DCF calculation for palm oil, soy, paper and timber and beef in our Private Brand and perishable products is being finalised. We will report on our progress in the second half of 2025, in the 5th Progress Report 'Contributing to a forest positive future'. • Palm oil: the Companies in Portugal and Poland maintained RSPO certification for 100% of the palm oil used. In Colombia, Ara has traced the origin of 95% of the palm oil back to the area where it was produced. The palm oil in our products comes from three of the four production areas in the country and from 25 (out of 70) processing plants in operation in Colombia. Only 0.75% of deforestation detected by public bodies in 2021 was associated with palm oil. At Ara, more than 75% of the palm oil used in Private Brand and perishables was produced in Colombia and 66% was RSPO certified. By 2024, 59% of the palm oil in Ara's Private Brands and perishables that did not come from Colombia was RSPO certified. • Soy: We were able to trace the origin, at least up to the country of production, of 95% of the total soya in our supply chains (up 2 p.p. compared to 2023). Around 64% of the total soy from known origins comes from countries with risk of deforestation (-6 p.p. compared to 2023) of which 17% had sustainability certification (e.g. RTRS). • Beef: it was possible to map all the beef used in our Private Brands and perishables to at least the country of origin. Based on this work, it was possible to confirm that only 0.4% of the total originated from Brazil. Despite the reduced exposure to this ingredient, we maintain our participation in the beef working group under the CGF's Forest Positive Coalition of Action. • Paper and timber: 90% of the virgin fibres used in our Private Brand and perishables products and packaging had sustainability certification (FSC® or PEFC).
Biodiversity and ecosystems [ESRS E4-4]	 NON-MATERIAL	By 2026, analyse the sustainability status of fish stocks for at least 80% of fish sales (in kg), from Private Brand and perishable products, and publicly disclose progress.	<p>In progress.</p> <p>In 2024, we analysed more than 80% of sales of Private Brand and perishable fish (in kg) at Ara, Biedronka, Pingo Doce and Recheio. This analysis allowed us to identify the ten most representative fishing areas and to conclude that: 51% of the wild fish from these areas has no conservation risk (50% classified as Least Concern and 1% as Near Threatened) and 33% is classified as the lowest conservation risk level (Vulnerable). Around 17% of wild fish have not been assessed or have insufficient data on their conservation status.</p>




ESRS topic	Materiality	Commitment	Progress
Biodiversity and ecosystems [ESRS E4-4]	 NON-MATERIAL	By 2026, ensure that 100% of wild-caught tuna in our Private Brand and perishable products is traceable to the vessel.	In progress. By 2024, we were able to track 42% of our consumption of Private Brand and perishable tuna down to the vessel level. We will continue our efforts to ensure that this goal is met.
Biodiversity and ecosystems [ESRS E4-4]	 NON-MATERIAL	Eliminate, by 2025, the sale of Private Brand fresh eggs from caged hens.	In progress. In 2024, in the Group, 98% of fresh Private Brand eggs sold come from non-caged hens. Biedronka, which also extended the goal to supplier brands, reached the 100% target at the end of 2022, just as Pingo Doce had already done in August 2019. Ara does not have fresh Private Brand eggs in its assortment.
Biodiversity and ecosystems [ESRS E4-4]	 NON-MATERIAL	By 2026, in Portugal and Poland, ensure that at least 90% of eggs used as an ingredient in our Private Brand products are from cage-free hens.	In progress. At Biedronka, since 2022, eggs from non-caged hens have been used in 100% of the Private Brand assortment that contains egg as an ingredient. Pingo Doce and Recheio continued to make progress and ended 2024 with 73% (+12 p.p. compared to 2023) and 41% (+3 p.p. compared to 2023), respectively. Additionally, at Ara it was possible to monitor, for the first time, Private Brand products that use eggs from non-caged hens as an ingredient, and it was found that 68% of the assortment used cage-free eggs.
Resource use and circular economy [ESRS E5-3]	 MATERIAL	Ensure that at least 25% of Private Brand products' packaging is included in the Ecodesign project by 2026, considering the 2023 assortment.	Accomplished. In 2024, 454 eco-design projects for Private Brand product packaging were completed. The accumulated value, since 2011, corresponds to 2,347 packages developed according to ecodesign strategies, which corresponds to 25.7% of the 2023 assortment.
Resource use and circular economy [ESRS E5-3]	 MATERIAL	Reduce by 10%, by 2025, the specific consumption of plastic measured in tonnes of plastic packaging per million euros of turnover, compared to 2018.	In progress. In 2024, the reduction in specific plastic consumption (t/million euros of sales) was 42%, compared to 2018.
Resource use and circular economy [ESRS E5-3]	 MATERIAL	Increase the content of recycled plastic incorporated in plastic packaging under our responsibility (Private Brand, service packaging, carrier bags and palletizing film) to 25% by 2025.	In progress. In 2024, the recycled plastic content was 11.6% in plastic packaging, 13.4 p.p. below the target for 2025.
Resource use and circular economy [ESRS E5-3]	 MATERIAL	Ensure an annual waste recovery rate of at least 85% of the volume of waste generated by 2026.	In progress. In 2024, the waste recovery rate stood at 84.8%, i.e., 0.2 p.p. below the target set for the 2024-2026 triennium.
Resource use and circular economy [ESRS E5-3]	 MATERIAL	Limit annual food waste to 2.5% of total food sales (in tonnes), in the 2024-2026 period.	In progress. In 2024, the Group's food waste stood at 1.8% of total sales volume (in tonnes) of foodstuffs.
Resource use and circular economy [ESRS E5-3]	 MATERIAL	Increase by 10% the amount of rescued food in own operations and in the supply-chain, namely through food donations, sales with a discount price of food products reaching the expiry date, recovery of non-graded food from farmers and leftovers from own operations and recovery of wasted food to animal feed and bio processing, by 2026, compared to 2023.	In progress. In 2024, the increase in the amount of food recovered in own operations and in the supply chain stood at 21%, 11p.p. more than the target set for the 2024-2026 triennium.







6.1.2. Social

ESRS topic	Materiality	Commitment	Progress
Own workforce [ESRS S1-5]	 MATERIAL	<p>Promote respect for human and labour rights, by:</p> <ul style="list-style-type: none"> i. ensuring a training module on the Code of Conduct available to 100% of employees; ii. ensuring a global training programme on human and labour rights available to 100% of managers; iii. implementing an internal global policy and process of prevention and compliance with labour rights, reflecting the Labour Fundamentals Guidelines in place. 	<p>In progress</p> <ul style="list-style-type: none"> i. An e-learning training module on the Group's Code of Conduct has been launched for Poland, Portugal and Colombia, which is mandatory for all employees. The version to be launched in Slovakia is under development. ii. An e-learning training module on human and labour rights was developed and a pilot was conducted to test the course contents. The launch for all managers in Portugal is planned for 2025. iii. In Portugal, the critical topics to be included in the future process of prevention and compliance with labour rights have been identified and approved. These topics will be assessed in a transversal diagnosis across all HR departments in the country. In parallel, a preliminary diagnosis of the Group's compliance levels with the requirements of a formal human rights due diligence process was conducted by an external entity.
Own workforce [ESRS S1-5]	 MATERIAL	<p>Strengthen the promotion of gender equality across the Group, by:</p> <ul style="list-style-type: none"> i. deploying a global diagnosis of HR practices to identify any gender inequalities that may exist and work on the identified improvement opportunities; ii. ensuring a gender pay ratio* variation of +/- 3% compared to the parity ratio (100%), globally and by country; iii. ensuring a global training programme on unconscious bias available to 100% of managers. <p>* Salary difference between women and men in the Jerónimo Martins Group employee universe, based on comparable realities. It is expressed considering the average salary of women as a percentage of the average salary of men, with 100% being the pay ratio that represents full equality among genders (parity).</p>	<p>In progress</p> <ul style="list-style-type: none"> i. A global diagnosis was carried out with a focus on indicators of gender representativeness and human resources practices, focused on identifying possible inequalities in the opportunities offered to women and men throughout the various stages of the employee's life cycle. For 2025, we plan to define next steps of action. ii. The global gender pay ratio remained stable at 98.5%, thus being in the defined variation range. For the first time this year, the ratio for the three most representative Companies of the Group was also reported, the result of which is also in line with the commitment: Biedronka: 98.1% Pingo Doce: 99.9% Ara: 98.7%. iii. An e-learning training module on discrimination and harassment in the workplace has been developed, which includes content on unconscious bias and on how to identify and mitigate it. A pilot has been conducted to test the course contents. The launch to all managers in Portugal is planned for 2025. In addition, other mechanisms for introducing these contents into global training tools and programmes are being evaluated.





ESRS topic	Materiality	Commitment	Progress
Own workforce [ESRS S1-5]	 MATERIAL	<p>Reinforce leadership capabilities in future generations and stimulate knowledge transfer, by:</p> <ul style="list-style-type: none"> i. organizing at least four yearly global sessions with senior experts, available to all young talent population; ii. promoting a global Jerónimo Martins experience for the young talent population, with the definition of a new global trainee policy; iii. ensuring that 90% of managers take part in at least one leadership development initiative by the end of 2026; iv. embedding the Group's Values and associated behaviours in people management processes with at least two global processes reviewed and 100% of eligible employees impacted; v. implementing a mechanism to measure leadership impact in the Group. 	<p>In progress.</p> <ul style="list-style-type: none"> i. In 2024 we developed the JM Talks concept, which are sessions made to inspire and share business knowledge between experienced and junior leaders of the Group. Two sessions took place at a global level, where 547 young leaders participated. ii. In 2024, the new global policy for young talent was defined, which aims to establish the guidelines each country to provide a common experience on the main programmes (such as the Trainee Programme). This policy is expected to be internally published in 2025. iii. In 2024, 52.5% of the Group's managers participated in at least one leadership development initiative, which include management and leadership training, assessment programmes, coaching, mentoring, among others. iv. The performance management process was revised, now encompassing the Group's Values and behaviours' evaluation. This change will be reflected in the 2024 performance cycle, which culminates in the first quarter of 2025, with the self-evaluation and evaluation by manager stages. As part of the onboarding process, a mandatory e-learning was included for all employees admitted to headquarters' roles in Portugal. We are working to incorporate JM Values into other global processes. v. A new Group-wide employee engagement survey will be launched in 2025, which includes, among other aspects, leadership-related questions.
Own workforce [ESRS S1-5]	 MATERIAL	<p>Strengthen our recognition mechanisms and promote greater transparency about compensation, by:</p> <ul style="list-style-type: none"> i. ensuring at least one recognition mechanism that values behaviours in all Companies (evolving existing ones or implementing new recognition mechanisms), covering 100% of employees by 2026; ii. making available the total compensation package statement (fixed and variable remuneration and benefits) to 100% of employees by 2026. 	<p>In progress.</p> <ul style="list-style-type: none"> i. All the Group's Companies continue to work to ensure compliance with this commitment. The 2024 performance cycle, where Values and behaviours' evaluation are now included, will be the basis for the calculation of the annual performance bonuses of all eligible employees. ii. The Group is assessing, based on the implementation priorities of existing technological solutions, the feasibility of the timetable set for this commitment.







ESRS topic	Materiality	Commitment	Progress
Own workforce [ESRS S1-5]	 NON-MATERIAL	Increase the number of employees in our workforce at a disadvantaged position in accessing the labour market (people with disabilities and/or impairments, refugees and migrants or people at social risk) and contribute positively to increasing social inclusion awareness within and outside the Group, promoting at least four yearly forums to share good practices in this scope.	<p>In progress.</p> <p>The number of employees at a disadvantage in accessing the labour market* corresponded, at the end of 2024, to 4.7% of the Group's population. The result obtained in the first year of monitoring of this commitment will serve as a basis for comparison for the following reporting cycles, in order to determine the increase in the number of employees at a disadvantage when it comes to accessing the labour market. In 2024, with regard to contributing to the increase in awareness of social inclusion inside and outside the Group, the commitment has been achieved, as we have secured 54 actions to share good practices, most of which focused on the presentation of the Incluir Programme to companies, schools, foundations and other types of national and international institutions.</p> <p>* The criteria considered in each country were: i) Portugal - employees with a certificate of disability or identified in the Incluir Programme in the following pillars: disabilities and/or impairments, migrants and refugees and people at social risk; ii) Poland – employees with a certificate of disability and refugees of Ukrainian nationality; iii) Colombia: employees with a certificate of disability, refugees of Venezuelan nationality and employees identified under the "Mamas Cabezas de Hogar" programme (the programme was not active during 2024 and its relaunch is planned for 2025).</p>
Own workforce [ESRS S1-5]	 MATERIAL	<p>Reinforce our internal development and mobility opportunities, increasing their attractiveness and effectiveness, by:</p> <ul style="list-style-type: none"> i. creating personal development plans for at least 95% of eligible managers; ii. evolving the personal development plan definition process, aligning it with individual and business needs and ensuring close follow-up (from line managers and HR) for managers in the talent pool; iii. ensuring that 100% of eligible internal vacancies are published and increasing the average number of applications per vacancy; iv. rolling out a global referral programme. 	<p>In progress.</p> <ul style="list-style-type: none"> i. Regarding the 2024 performance cycle, 95.3% of eligible managers have defined personal development plans. ii. The personal development plans (PDP) process now includes moments dedicated to reflection and monitoring of its degree of execution, during Get Feedback sessions (meetings between the evaluator and his or her manager, midway through the performance cycle, focused on monitoring objectives and discussing mid-term feedback) and during the self-evaluation and evaluation process. iii. In 2024, we ensured the internal posting of 74.6% eligible vacancies that were published externally, with an average of 2.6 internal applications per vacancy registered. The result obtained in the first year of measurement of this commitment will serve as a basis for comparison for the following reporting cycles. iv. A global internal referral policy for the Information Technologies department is in place, which has been extended to other roles in Portugal.





ESRS topic	Materiality	Commitment	Progress
Own workforce [ESRS S1-5]	 MATERIAL	<p>Foster safe working conditions, by:</p> <ul style="list-style-type: none"> i. investing in certifying at least three new workplaces/Companies following ISO 45001; ii. decreasing the current frequency index* and severity index** to 12.00 and 0.29, respectively. <p>* Number of accidents with loss of working days / total hours worked.</p> <p>** Number of days lost / total hours worked</p> <p>To ensure comparability of the results with the defined target and between reporting periods, within the 2024-2026 commitment cycle, and considering that the frequency and severity indexes are not indicators required under the ESRS, the same methodology for determining lost days was maintained, which considers only expected days of work.</p>	<p>In progress.</p> <ul style="list-style-type: none"> i. In 2024, the occupational health and safety management system implemented in the two central kitchens of Pingo Doce's Meal Solutions was certified by ISO 45001:2023. The certification of logistics in Portugal and Recheio is in the preparation phase. ii. In 2024, the Group achieved a frequency index of 11.87, which corresponds to a decrease of 1.19 compared to 2023. There was a reduction in accidents with lost days, both in Portugal and Poland (of 3.2% and 15.0%, respectively). The severity was 0.29, a decrease of 0.03 compared to 2023.
Own workforce [ESRS S1-5]	 MATERIAL	<p>Promote a flexible and healthy work environment across the Group, by:</p> <ul style="list-style-type: none"> i. piloting at least one measure in the scope of new ways of working and/or hiring; ii. making training in wellbeing available to 100% of managers, giving them tools to identify and manage their own issues and help their team; iii. ensuring that 100% of employees have access to a structured wellbeing programme; iv. supporting employees in vulnerable situations due to social and/or family emergencies across the Group, ensuring at least the same level of investment in the Social Emergency Fund, in Portugal, and in Możesz Liczyć (You Can Count on Biedronka)*, in Poland. <p>*The Możesz Liczyć (You Can Count on Biedronka) programme has been discontinued, so the investment monitored as part of the commitment made to maintain support for Biedronka employees in vulnerable situations will be equivalent to that of social allowances and loans granted to employees with special conditions, related to housing needs (components that were part of the You Can Count on Biedronka programme until 2023).</p>	<p>In progress.</p> <ul style="list-style-type: none"> i. In 2024, Biedronka and Pingo Doce tested new measures to promote flexibility in ways of working and hiring. Biedronka has implemented the Tikrow solution, a platform that allows the Company to respond to temporary and immediate work needs in operations. Pingo Doce is evolving its schedule planning tool into a new solution that, being fed by business data such as sales and in-store customer traffic, allows for greater predictability of needs at all times. ii. Wellbeing contents will be incorporated into a global development training tool (Be a Leader for all), aimed at all Group employees. iii. In Portugal and Poland, 100% of employees have access to a wellbeing programme. In Colombia there are several initiatives aimed at certain target audiences. iv. In 2024, we maintained the support given to employees in vulnerable situations, with an investment of more than 48.4 million euros in internal social responsibility measures. The investment made in social allowances and loans granted to employees with special conditions at Biedronka, and in the Social Emergency Fund in Portugal, was 7.9 million euros, 7.5% above 2023.
Affected communities [ESRS S3-5]	 MATERIAL	<p>Monitoring and disclosure of at least 70% (in value) of the social impacts resulting from the annual support offered by all Jerónimo Martins Companies, according to the Business for Societal Impact (B4SI) model and aligned with criteria for the financial materiality.</p>	<p>Accomplished.</p> <p>In 2024, it was possible to monitor 99% of the Group's direct support (eligible according to the internal methodology based on the B4SI criteria). The monitoring and dissemination of the impacts resulting from the support offered by the Group, according to this model, are described in the subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.2 "Affected communities", point "How we dialogue with affected communities".</p>







ESRS topic	Materiality	Commitment	Progress
Affected communities [ESRS S3-5]	 MATERIAL	Strengthen the involvement in social projects in all geographies, targeted to children, youngsters and elderly people from vulnerable environments, aiming to directly impact one million people per year, until 2026.	Accomplished. Based on the B4SI methodology, we estimate that the Group Companies have supported more than 1.2 million people from vulnerable backgrounds, including projects focused on health and healthy eating. At least one Company in each geography (Poland, Portugal, and Colombia) has implemented or supported one or more projects aimed at these vulnerable populations.
Affected communities [ESRS S3-5]	 MATERIAL	In Colombia, promote health through food to at least 3,000 vulnerable children, per year, by supporting them with in-kind donations in regions with the highest indicators of malnutrition and food insecurity.	Accomplished. In alliance with the Association of Colombian Food Banks (ABACO), Jerónimo Martins Colombia has become the most relevant partner of the "Desayunos Saludables" (Healthy Breakfast) project in 2024. Throughout the year, the Company ensured the presence of fruit and bread at breakfast provided by 24 food banks in different regions of Colombia, which allowed 4,294 children to be supported.
Affected communities [ESRS S3-5]	 MATERIAL	By 2026 in Colombia, ensure that 50% of stores donate food and non-food products to nongovernmental organizations, with the aim of supporting vulnerable people.	In progress. In 2024, there were 273 Ara stores with donation procedures to local institutions. This number represents 19% of the Company's stores.
Affected communities [ESRS S3-5]	 MATERIAL	In Colombia, ensure support until 2026, to more than 1,200 community mothers' houses through food and equipment assistance, while simultaneously following-up on nutritional indicators of children under their care, such as anthropometric measures.	Accomplished. In 2024, a memorandum of understanding was signed with the Colombian Institute of Family Welfare (ICBF) to be in force for a period of three years, aiming to support community mothers' houses. Throughout the year, 2,963 community mothers' houses were supported with gift cards to use in Ara stores in healthy food baskets. At the same time, a technical assistance programme was developed in partnership with the ICBF and UNICEF to prepare community mothers in the early identification of signs of malnutrition and chronic malnutrition, and in the implementation of healthy habits.
Affected communities [ESRS S3-5]	 MATERIAL	In Colombia, ensure at least 200 volunteers participate on environmental protection initiatives and livelihood improvement projects for vulnerable people by 2026.	In progress. In 2024, we ensured the participation of 150 volunteers in different initiatives focussed on environmental protection, and improvement of the livelihoods of vulnerable people. For more information about the volunteering initiatives, please consult the subchapter 4. "Social Information", section 4.2 "Managing social topics", subsection 4.2.2. "Affected Communities", point "Programs and projects to engage and support affected communities".
Affected communities [ESRS S3-5]	 MATERIAL	In Colombia, support more than 60,000 people by 2026 in context of vulnerable conditions through humanitarian and livelihood programs, namely with food, prioritizing children and regions with the highest poverty rate and higher food insecurity indicators, by ensuring at least two partnerships with NGOs and/or other industry leaders.	Accomplished. In 2024, we were able to provide support to more than 63,000 people, through the "One Million Reasons" program, which involves an investment of one million euros until 2026.

ESRS topic	Materiality	Commitment	Progress
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Biedronka, ensure the extension of product warranty from 2 to 3 years for all electric and additional non-electric non-food products where applicable.	In progress. In 2024, we ensured the extension of products warranty in eight electric and non-electric categories from 2 to 3 years. Out of 405 products in scope, 395 now come with an extended warranty, covering 98% of the commitment scope.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In all countries reinforce the offer of food alternatives such as vegan, plant-based, low carbohydrates, fat and salt, low sugar content/sugar-free, lactose-free, gluten-free and/or for consumers over 50 years old.	Accomplished. We have redefined our commitment for greater clarity: "In all countries, we must strengthen the offer of food alternatives such as vegan, vegetarian and plant-based, lactose-free, gluten-free or organic". In 2024, the progress was: <ul style="list-style-type: none"> Poland: 363 references with these characteristics, of which 34 were new. Portugal: a total of 1,489 references were on sale, of which 103 were new. Colombia: a total of 27 references were on sale, of which 14 were new.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In all countries, ensure that products targeted for children have higher, or at least equal, nutritional profile than the benchmark (or best in class), according to the country of operation.	In progress At the time of the product launch, products may have a nutritional profile considered to be better than the benchmark (or best in class) while, for reasons of competitive dynamics, formulas may be progressively (in the same year or in subsequent years) improved by competitors. In 2024 (versus 2023): <ul style="list-style-type: none"> Private Brand Poland: 41% (-11 p.p.) of the products had a higher profile than the market, 48% (+2 p.p.) had the same profile, and 11% (+10 p.p.) had a worse profile. Private Brand Portugal: out of the 44 products on sale mostly consumed by children in Pingo Doce and Amanhecer, 73% (-5 p.p.) had similar profiles to the benchmark, and 23% (+1 p.p.) had a better profile, and 6% had a worse profile (there were no products under this category in 2023) which will be subject to further analysis for improvement. Private Brand Colombia: the only references in this category were the Bubu jams in three variants. 67% of these had a benchmark for comparison, and had a higher nutritional profile.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Portugal ensure the use of voluntary "Without GMO" labelling for at least 75% of Private Brand food references containing mostly (>50%/net weight) potentially modified ingredients (soy and corn), helping consumers in the decision-making process.	In progress. At the end of 2024, this symbol was present in 71% of products that contained more than 50% of corn and/or soy in the net weight, representing a 41 p.p. increase versus 2023.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Portugal, facilitate responsible consumption through voluntary labelling of alcoholic beverages (including wines) for 100% of Private Brand references, in the following areas: <ul style="list-style-type: none"> calorie intake; not recommended for pregnant women; promotion of responsible driving 	In progress. Specific symbols on alcoholic beverages were applied: calorie count and pregnancy warnings on 100% of the references, and responsible driving on 74% of the eligible references. Calorie intake is of mandatory application as per law requirements.






ESRS topic	Materiality	Commitment	Progress
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Hebe, reinforce the relevance of Private Brand alternatives without ingredients of animal origin, in particular by launching at least 10 new references a year.	Accomplished. Hebe launched 62 new vegan cosmetic products, bringing the full vegan range to 151.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Hebe, reinforce the relevance of "Hebe Naturals" product range, which contain at least 92% natural ingredients in their formula (according to ISO 16128).	Accomplished. Hebe launched 16 Hebe Naturals products containing at least 92% natural ingredients by net weight, bringing the portfolio of products with these characteristics to 29.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Portugal, Poland and Colombia, carry out at least one annual programme to promote the principles of the Mediterranean diet or healthy eating habits in geographies with other diets (based on the recommendations of local experts).	In progress. Pingo Doce prints cooking tips and suggestions on the food packaging, always promoting the use of fruit and vegetables as side dishes. The Company also uses its website, social media and Sabe Bem (Tastes Good) magazine to promote the Mediterranean diet. This magazine was the most read publication in Portugal in 2024, reaching 627 thousand readers in each one of its bi-monthly editions. The publication usually includes articles written by the Portuguese Directorate-General for Health. Pingo Doce also has a large collection of recipes to encouraging the reuse of leftovers food on its website. Also, on its website is a list with lactose-free and gluten-free Private Brand products, which is updated monthly. Biedronka has published four Czas Na... (Time For...) magazines in 2024, all of them digital, focusing on seasonality and more sustainable lifestyles. Dada, Biedronka's Private Brand specialising in nutrition for babies, children and mothers, names a magazine that is produced in a collaboration between Instytut Matki i Dziecka (Institute of Mother and Child) and Biedronka's Quality Department. Two digital books were developed in 2024 as a result of this partnership. The Company also makes an extensive use of media formats such as leaflets, newspapers and publications on social media to spread knowledge about healthy eating habits.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In all countries, promote literacy for product labelling.	In progress. The product information voluntarily provided by the Companies can be consulted in the 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Engaging with consumers", subpoint "Providing information to consumers" of this chapter. In Colombia, guidelines have been created for the operators of our stores and distribution centres, explaining the latest labelling law in Colombia and how it affects our Private Brand products. This guide explains that in Colombia, as of 14 June 2024, our products will be required to carry an octagonal warning label indicating whether they contain high levels of sugar, saturated fat, trans fat, salt or even sweeteners.

ESRS topic	Materiality	Commitment	Progress
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Portugal, ensure the Nutri-Score labelling is applied on 100% of Private Brand food launches.	In progress. Nutri-Score was present in 872 Pingo Doce products (48% more than in 2023) and in 197 Recheio products (38% more), being all launches bearing this label.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Poland, ensure the Nutri-Score labelling is applied on 100% of Private Brand food launches in selected categories.	In progress. In 2024, Biedronka applied the Nutri-Score label to more 138 products, increasing the total number to 543 (more 34% than in 2023) and raised the number of brands selected for categorization to 41 (including six for the Slovakian market).
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Colombia, ensure that 100% of Private Brand products do not contain, in their direct ingredients, artificial colorants or flavour enhancers until 2026.	In progress. Regarding artificial colourings: <ul style="list-style-type: none"> in specialized perishables, we reached 100% products free from artificial colourings (+4 p.p. vs. 2023); in Private Brands, the ratio stood at 97% (+2 p.p.). Regarding flavour enhancers: <ul style="list-style-type: none"> in specialized perishables, we reached 100% products free from artificial colourings already in 2023; in Private Brands, the ratio stood at 97% (+1 p.p.).
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Poland, guarantee the absence of glucose-fructose syrup in at least 90% of Private Brand products by the end of 2026.	In progress. In Poland, 168 products were considered eligible. Of these, 146 were completed as to the removal of glucose-fructose syrup corresponding to 87% of Private Brand products (+3 p.p. vs. 2023).
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Poland, remove soy lecithin in at least 50% of Private Brand products with that ingredient until the end of 2026.	In progress. 157 products were considered. Of these, soy lecithin was removed from 43 corresponding to a total of 27% Private Brands without this ingredient (+5p.p. vs. 2023).
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Poland and in Portugal, ensure whenever possible, by the end of 2026, that wholegrains are the main ingredient in breakfast cereals (with the exception of corn-based cereals).	In progress. Our Portuguese Companies have reached the target of having 100% of breakfast cereals containing wholegrains as their main ingredient two years ahead our own deadline. In Poland, Biedronka's progress reached 92% of the eligible products (44 references out of 48, which includes products that, in practice, contain whole grain as the main ingredient but are not labelled as such in the ingredient list).




ESRS topic	Materiality	Commitment	Progress
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Portugal, guarantee the enrichment of essential minerals and vitamins in the best-selling Private Brand products that aim to complement the main sources of food until the end of 2026.	<p>Accomplished.</p> <p>Two ranges of Private Brand products were considered for determining the scope of this target: complements for milk (in which micronutrients naturally present in milk, like calcium and vitamin D, need to be reinforced) and for meat (in which protein enrichment for vegetable sources is important). In 2024 we reached:</p> <ul style="list-style-type: none"> • Milk alternatives: 100% (the same as in 2023) of soy, oat, hazelnut, almond and rice beverages, were enriched with micronutrients such as calcium, selenium, magnesium, zinc, omega 3 and fibre, and vitamins like riboflavin (B2), B12 and D. • Meat alternatives: 100% of products were enriched with vegetable protein.
Consumers and end-users [ESRS S4-5]	 MATERIAL	Ensure that, by 2026, 100% of our Private Brand food portfolio does not contain acesulfame and develop alternatives, together with suppliers, to replace aspartame for natural sweeteners.	<p>In progress.</p> <p>At the time of the product launch, products may have a nutritional profile considered to be better than the benchmark (or best in class) while, for reasons of competitive dynamics, formulas may be progressively (in the same year or in subsequent years) improved by competitors. In 2024 (versus 2023):</p> <ul style="list-style-type: none"> • Private Brand Poland: 41% (-11 p.p.) of the products had a higher profile than the market, 48% (+2p.p.) had the same profile, and 11% (+10 p.p.) had a worse profile. • Private Brand Portugal: out of the 44 products on sale mostly consumed by children in Pingo Doce and Amanhecer, 73% (-5 p.p.) had similar profiles to the benchmark, and 23% (+1 p.p.) had a better profile, and 6% had a worse profile (there were no products under this category in 2023) which will be subject to further analysis for improvement. • Private Brand Colombia: the only references in this category were the Bubu jams in three variants. 67% of these had a benchmark for comparison, and had a higher nutritional profile.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Portugal and Poland, reinforce the relevance of the offer of Private Brand cosmetic products without ingredients of animal origin, for consumers with specific preferences.	<p>In progress</p> <ul style="list-style-type: none"> • In Portugal, Pingo Doce and Amanhecer ended the year with 29 new Private Brand cosmetic products on the market, bringing the total to 158. • Biedronka launched 27 references, totalling 257 Private Brand cosmetics without animal ingredients.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Biedronka, ensure that at least 95% of the Private Brand regular assortment of personal hygiene products is microplastic-free.	<p>Accomplished.</p> <p>At the end of 2024, Biedronka had 101 Private Brand personal care references without microplastics, representing 98% of the range.</p>





ESRS topic	Materiality	Commitment	Progress
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Portugal and Poland, reinforce the relevance of the offer of Private Brand cosmetic products containing at least 90% of natural ingredients in their composition (in line with ISO 16128).	In progress. During 2024, we strengthened our offer of these products: <ul style="list-style-type: none"> • In Portugal, Pingo Doce and Amanhecer ended the year with 135 products, 38 of which were launched during the year. • Biedronka ended the year with 192 references with at least 90% natural ingredients, 48 of which were launched in 2024.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Biedronka develop Private Brand detergents that have, simultaneously, natural fragrances in their ingredients, are preservatives-free and are Ecolabel certified.	In progress. In 2024, no Private Brand detergents were developed with all of those characteristics.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Biedronka, introduce the 'Eat fish twice a week' labelling for 100% of fresh fish references in selected processed Private Brand references and specialized perishables by 2026.	In progress. "Eat Fish Twice a Week" label was launched in its first product, to raise awareness for the consumption of fish.
Consumers and end-users [ESRS S4-5]	 MATERIAL	Seek to ensure, on an annual basis, that the number of recalls of food products with potential risk to public health (level I severity), the cause of which is attributable to the Jerónimo Martins Companies, is zero. In the event of the occurrence of cases of level I severity, and in line with Jerónimo Martins' Product Quality and Safety Policy, ensure by all available means that the collection of food products in stores and distribution centres is 100% effective.	Accomplished. The Group had 4 level I recalls, none of which attributable to Jerónimo Martins as the cause. This figure represented a 33.3% decrease compared to 2023, a year in which there had already been a 53.8% decrease compared to 2022, proving a downward trend in this indicator. The effectiveness for recalling products was fully complied with.
Consumers and end-users [ESRS S4-5]	 MATERIAL	In Poland, maintaining the number of ISO 22000-certified locations (16 distribution centres in 2023) and ensuring that the new distribution centres to be opened in the 2024-2026 period are certified within two years of starting operations.	Accomplished. ISO 22000:2018 was maintained for 16 DCs and extended to one more, to a total of 17 Biedronka for the storage and distribution of food products, and at the Biedronka head office for the development of Private Brand food products.
Consumers and end-users [ESRS S4-5]	 MATERIAL	Increase sales of Private Brand and/or perishable products and packaging with sustainability certification to at least 15% of the total sales of these product categories by 2026.	In progress: In 2024, sales of Private Brands products and/or packaging and perishables with sustainability certification accounted for 14.2% (+8 p.p., compared to 2023).

6.1.3. Business conduct

ESRS topic	Materiality	Commitment	Progress
Business Conduct [ESRS G1-2]	 MATERIAL	Guarantee that at least 80% of the Jerónimo Martins Group's purchases of food products are sourced from local suppliers.	Accomplished. In 2024, more than 90% of food products were purchased from local suppliers.
Business Conduct [ESRS G1-2]	 MATERIAL	Carry out environmental audits to at least 20% of selected Private Brand and perishables suppliers, based on a risk assessment and with a purchase volume greater than one million euros, in the 2024-2026 period.	In progress. In 2024, 37 suppliers of perishable and Private Brand products were audited, including re-audits. Of these 37 supplier audits, 11 correspond to suppliers with ISO 14001 certification. At least 232 suppliers are expected to be audited in 2024-2026, 20% more than in 2021-2023.
Business Conduct [ESRS G1-2]	 MATERIAL	In Poland, carry out inspections to 100% of egg farming units from which Private Brand fresh eggs are produced for Biedronka, until the end of 2024.	Accomplished. 100% of Biedronka's Private Brand fresh egg production units were inspected, thus meeting the objective. Since 2018, more than 200 audits have been carried out.
Business Conduct [ESRS G1-2]	 MATERIAL	In Portugal and Poland, ensure, by 2026, that animal welfare topics are included in the scope of audits to perishable suppliers who manufacture products containing at least 80% animal protein, and publicly disclose the results.	Accomplished. In 2024, we ensured that, in Portugal and Poland, aspects related to animal welfare were included in the scope of audits of perishables suppliers that produce products containing at least 80% animal protein. In Poland, animal welfare audits have been carried out in the areas of primary meat production and in fresh aquaculture fish production. In Portugal, animal welfare audits were carried out in the areas of primary meat production and slaughterhouses and fresh aquaculture fish productions (in the case of suppliers not certified by the Global GAP). The results of these audits are reported in chapter 5. "Governance information", section 5.2. "Business conduct", subsection 5.2.1, "Selection and monitoring of suppliers".
Business Conduct [ESRS G1-2]	 MATERIAL	In Poland, starting from 2024, carry out 100% of fresh fish from aquaculture audits according to the 'Fish Welfare' standard.	In progress. In 2024, Biedronka initiated the audit of direct suppliers of fresh aquaculture fish according to the Group's "Fish Welfare" standard representing 42% of Biedronka direct suppliers of this category. In addition, these audits were also carried out for the first time in Portugal.

6.2. Long-term commitments

ESRS topic	Materiality	Commitment	Progress
Climate change [ESRS E1-4]	 MATERIAL	Reduce energy consumption by 15% by 2030 (compared with 2021 levels).	In progress. In 2024, there was an increase in consumption of 11.8%, compared to 2021.
Climate change [ESRS E1-4]	 MATERIAL	Reduce absolute energy and industry scopes 1 and 2 GHG emissions by 55% by 2033, from a 2021 base year.	In progress. In 2024, the reduction in the Group's scope 1 and 2 carbon emissions, in absolute terms, was 19%, compared to 2021.
Climate change [ESRS E1-4]	 MATERIAL	Reduce absolute energy and industry scope 3 emissions in 33% by 2033, from a 2021 base year.	In progress.

ESRS topic	Materiality	Commitment	Progress
			In 2024, there was a 16.6% increase in absolute scope 3 GHG emissions compared to 2021.
Climate change [ESRS E1-4]	 MATERIAL	Reduce absolute forest, land and agriculture (FLAG) scopes 1 and 3 emissions in 39.4% by 2033, from a 2021 base year.	In progress. In 2024, there was a 16.5% increase in absolute emissions from scopes 1 and 3 of forests, land and agriculture (FLAG), compared to 2021.
Climate change [ESRS E1-4]	 MATERIAL	Reach 60% renewable electricity consumption by 2030.	In progress. In 2024, the consumption of electricity from renewable sources stood at 62.2%.
Climate change [ESRS E1-4]	 MATERIAL	Switch to 100% natural or low Global Warming Potential (GWP) refrigerants in Poland and Portugal by 2030 and in Colombia by 2035.	In progress. In 2024, 57% of stores had cold storage units and 86% had autonomous equipment with natural refrigerant gases or low global warming potential. In 2024, 70% of distribution centres and industrial units had central cooling systems with natural refrigerant gases or low global warming potential.
Climate change [ESRS E1-4]	 MATERIAL	Reduce absolute energy and industry scopes 1 and 2 GHG emissions by 90% by 2045, from a 2021 base year.	In progress. In 2024, the reduction in the Group's scope 1 and 2 carbon emissions, in absolute terms, was 18.8%, compared to 2021.
Climate change [ESRS E1-4]	 MATERIAL	Reduce absolute energy and industry scope 3 emissions in 90% by 2050, from a 2021 base year.	In progress. In 2024, there was a 16.6% increase in absolute scope 3 GHG emissions compared to 2021.
Climate change [ESRS E1-4]	 MATERIAL	Reduce absolute forest, land and agriculture (FLAG) scopes 1 and 3 emissions in 72% by 2050 from a 2021 base year.	In progress. In 2024, there was a 16.5% increase in absolute emissions from scopes 1 and 3 of forest, land and agriculture (FLAG), compared to 2021.
Climate change [ESRS E1-4]	 MATERIAL	Neutralise residual scopes 1 and 2 GHG emissions through projects that meet strict eligibility criteria, in line with international best practices by 2050.	In progress. In 2024, within the scope of the Climate Transition Plan, we continued to identify solutions to neutralise emissions in line with international criteria and best practices (e.g., agricultural carbon sequestration practices).
Biodiversity and ecosystems [ESRS E4-4] Consumers and end-users [S4-5]	 NON-MATERIAL	Ensure that, by 2030, 100% of virgin fibres used in our Private Brand and perishables products and packaging are certified by external and independent bodies, such as FSC® or PEFC.	In progress: In 2024, 90% of the virgin fibres used in our Private Brand and perishables products and packaging had sustainability certification (FSC® or PEFC).
Resource use and circular economy [ESRS E5-3]	 MATERIAL	By 2030, halve the food waste generated by the activity of our companies (compared to 2016), in line with target 12.3 of the Sustainable Development Goals on responsible consumption and production.	In progress. The value for 2024 was 19.9 kg of food wasted/tonne of food sold, three times higher than the target, assuming the specific value of 2016 (13.2 kg of food wasted/tonne of food sold).

7. Reporting frameworks

This report was prepared in accordance with the European Sustainability Reporting Standards (ESRS). This section includes five tables that aim to cross-reference the reported information with the main methodologies and information requests made by our stakeholders: indicators according to the European Sustainability Reporting Standards; GRI Standards; Sustainability Accounting Standards Board; an approximation to the International Financial Reporting Standards Sustainability Series (IFRS-S) and Jerónimo Martins' performance indicators. Whenever possible a cross-reference is also made between these points, and the Sustainable Development Goals and the Principles of the United Nations Global Compact.

7.1. ESRS – European Sustainability Reporting Standards

[ESRS 2 IRO-2, Appendix B]







Correspondence between ESRS topics and material topics resulting from the double materiality matrix

	ESRS Topic	Disclosure requirement	Material topic
Environment	E1 - Climate Change	GOV-3 SBM-3 IRO-1 E1-1 to E1-9	<ul style="list-style-type: none"> Climate Change
	E5 - Resource Use and Circular Economy	IRO-1 E5-1 to E5-6	<ul style="list-style-type: none"> Food waste Packaging redesign for sustainable resources use
Social	S1 - Own Workforce	SBM-2 and SBM-3 S1-1 to S1-11 S1-13 to S1-17	<ul style="list-style-type: none"> Labour rights and working conditions Employee learning and development
	S3 - Affected Communities	SBM-2 and SBM-3 S3-1, S3-2, S3-4 and S3-5	<ul style="list-style-type: none"> Engagement and supporting local communities
	S4 - Consumers and end-users	SBM-2 and SBM-3 S4-1 to S4-5	<ul style="list-style-type: none"> Product affordability Product safety and quality standards Product and services innovation
Governance	G1 - Business Conduct	GOV-1 IRO-1 G1-1 and G1-2 G1-6	<ul style="list-style-type: none"> Sustainable & responsible criteria in the supply chain

ESRS Indicators

ESRS Topic	Aspect	Disclosure requirement		Evidence	Other Standards
ESRS 2 - General disclosures	Basis for preparation	ESRS 2 BP-1 - General basis for preparation of sustainability statements	✓	See chapter 1 "The Jerónimo Martins Group", chapter 3 "Financial Statements" and chapter 4 "Corporate Governance", Part I - "Information on Shareholder Structure, Organisation and Corporate Governance". See also subchapter 2. "General disclosures", section 2.1. "Basis of elaboration", of this chapter.	GRI 2-2 GRI 3-1
		ESRS 2 BP-2 - Disclosures in relation to specific circumstances	✓	See subchapter 2. "General disclosures", section 2.1. "Basis of elaboration", of this chapter. For information on changes to sustainability data presented in previous periods see GRI 2-4 , table 2 in this subchapter. For information on sustainability required by other legislation or based on sustainability standards and frameworks, see section 7.2 "GRI (Global Reporting Initiative)" to section 7.4 "IFRS-S – International Financial Reporting Standards - Sustainability Series", in this subchapter. See also subchapter 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", in this chapter.	GRI 2-4 GRI 2-22 GRI 3-2 GRI 3-3
ESRS 2 - General disclosures	Governance	ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies	✓	See chapter 4 "Corporate Governance", Part I - "Information on Shareholder Structure, Organisation and Corporate Governance", sections A "Shareholder Structure", B "Governing Bodies and Committees" and C "Internal Organisation". See also subchapter 2. "General disclosures", section 2.2. "Governance and strategy", of this chapter and channel "Responsibility", page "Our Responsibility Strategy", subpage "Defining Our Priorities" on the website www.jeronimomartins.com .	GRI 2-9 GRI 2-12 GRI 2-13 GRI 2-14 GRI 2-17 GRI 405-1












ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
		ESRS 2 GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	✓ See subchapter 2. "General disclosures", section 2.2. "Governance and strategy", of this chapter. See also "Responsibility" channel, page "Our Responsibility Strategy", subpage "Defining Our Priorities" on the website www.jeronimomartins.com .	GRI 2-12 GRI 2-13 GRI 2-16 GRI 2-24
		ESRS 2 GOV-3 - Integration of sustainability-related performance in incentive schemes	✓ See chapter 4 "Corporate Governance", Part I - "Information on Shareholder Structure, Organisation and Corporate Governance", section D "Remuneration" and subchapter 2. "General disclosures", section 2.2. "Governance and strategy", of this chapter.	GRI 2-19 GRI 2-20
		ESRS 2 GOV-4 - Statement on due diligence	✓ See subchapter 2. "General disclosures", section 2.2. "Governance and strategy", and subchapter 3. "Environmental information", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", section 3.3.5. "Minimum safeguards", of this chapter. We also use an independent external verification process of limited reliability to ensure that both the reporting is consistent with the methodologies referred to and the reported figures are marked with the following symbol: ✓	
		ESRS 2 GOV-5 - Risk management and internal controls over sustainability reporting	✓ See subchapter 2. "General disclosures", section 2.4. "Managing Sustainability Reporting Risks", of this chapter.	GRI 2-14
	Strategy	ESRS 2 SBM-1 – Strategy, business model and value chain	✓ See subchapter 2. "General disclosures" of section 2.5. "Management of impacts, risks and opportunities and dual materiality analysis", of this chapter. See chapter 1 "The Jerónimo Martins Group", chapter 2 "Management Report - Creating Value and Growth", and chapter 4 "Corporate Governance".	GRI 2-6 GRI 2-7 GRI 2-22 GRI 3-3 GRI 201-1
		ESRS 2 SBM-2 – Interests and views of stakeholders	✓ See chapter 4 "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", sections A "Shareholder Structure", B "Governing Bodies and Committees" and C "Internal Organisation". See subchapter 2. "General disclosures", section 2.3. "Stakeholder engagement and communication channels" and section 2.5. "Impacts, risks and opportunities management and double materiality assessment", of this chapter. See also "Responsibility" channel, page "Our Responsibility Strategy", subpage "Defining Our Priorities" on the website www.jeronimomartins.com .	GRI 2-12 GRI 2-29
ESRS E1 - Climate Change	Governance	ESRS 2 GOV-3 ^m - Integration of sustainability-related performance in incentive schemes	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Managing climate-related risks and opportunities", subpoint "Governance", of this chapter.	GRI 2-19
	Strategy	E1-1 ^m - Transition plan for climate change mitigation	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Our climate transition plan", of this chapter. See also Climate Transition Plan .	
		ESRS 2 SBM-3 ^m - Material impacts, risks and opportunities and their interaction with strategy and business model	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Managing climate-related risks and opportunities", subpoints "Managing climate-related risks and opportunities" and "Identifying risks and opportunities", and point "Our climate transition plan", of this chapter. See also our Climate Transition Plan .	
	Impact, risk and opportunity management	ESRS 2 IRO-1 ^m - Description of the processes to identify and assess material climate related impacts, risks and opportunities	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Managing climate-related risks and opportunities", subpoint "Identifying risks and opportunities", of this chapter. See also Climate Transition Plan .	
		E1-2 ^m - Policies related to climate change mitigation and adaptation	✓ See subchapter 3. "Environmental information", section 3.1. "Our environmental-related policies" and section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Managing climate-related risks and opportunities", subpoint "Our strategy", of this chapter. See also Climate Transition Plan .	GRI 3-3
		E1-3 ^m - Actions and resources in relation to climate change policies	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Managing climate-related risks and	GRI 3-3 GRI 305-5

ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
ESRS E1 - Climate Change	Metrics and targets	E1-4 ^m - Targets related to climate change mitigation and adaptation	 <p>opportunities", subpoints "Our strategy" and "Identifying risks and opportunities", and points "Carbon footprint" and "Our actions to reduce carbon emissions", of this chapter. See also Climate Transition Plan.</p> <p>See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics, subsection 3.2.1. "Climate change" and subchapter 6. "Sustainability Commitments", section 6.1. "2024-2026 Commitments" and section 6.2. "Long-term commitments", of this chapter.</p>	GRI 3-3 GRI 305-1 GRI 305-2 GRI 305-3 GRI 305-5
		E1-5 ^m - Energy consumption and mix	 <p>See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Energy consumption management", of this chapter.</p>	GRI 302-1 GRI 302-3
	Metrics and targets	E1-6 ^m - Gross Scopes 1, 2, 3 and Total GHG emissions	 <p>See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Carbon footprint", of this chapter.</p>	GRI 201-1 GRI 305-1 GRI 305-2 GRI 305-3 GRI 305-4
		E1-7 ^m - GHG removals and GHG mitigation projects financed through carbon credits	 <p>See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Managing climate-related risks and opportunities", subpoint "Our strategy", of this chapter.</p> <p>Note: The Group Companies have not acquired carbon credits to offset their scope 1, 2 or 3 emissions, nor have they implemented removal or storage projects in their operations or value chain.</p>	GRI 305
		E1-8 ^m - Internal carbon pricing	 <p>The use of an internal carbon price aims to promote the reduction of emissions related to fuel consumption, both in own operations (scope 1 emissions) and in the supply chain (scope 3 emissions), through energy efficiency and other low-carbon measures. Examples include: i) investing in fuel efficient passenger vehicles for our own fleet; ii) integrating the fuel efficiency of freight vehicles as a criterion for selecting outsourced transport of goods between our distribution centers and more than 6,000 stores in Portugal, Poland and Colombia; iii) replacing fuel with natural gas. In addition to assessing the impact on fuel costs and emissions reductions, the use of the internal carbon price makes it possible to anticipate the impact of carbon tax legislation on the Group, both in direct operations and in outsourced activities, where fuel prices have an indirect impact on the Companies' costs. We apply a shadow price as an internal carbon price which is updated annually in line with the carbon tax updates in Portugal and Colombia. This is calculated on the basis of a weighted average of the price of carbon taxes in Portugal (€62.45/tCO₂) and Colombia (€5.86/tCO₂) in the reporting year. As the carbon tax in force in Poland is still very low (0.09 €/tCO₂), it is not taken into account in our internal carbon price. The value of the internal carbon price in 2023 was 28.40 €/tCO₂. Scope 1 GHG emissions associated with fuel consumption were covered by the internal carbon price, 86,895 tCO₂e (42.7% of scope 1 GHG emissions) and scope 3 emissions associated with fuel and energy activities (16,178 tCO₂e) and upstream transportation and distribution (260,575 tCO₂e), corresponding to 1% of total scope 3 emissions. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Carbon pricing", of this chapter.</p>	-
ESRS E2 - Pollution	Impact, risk and opportunity management	E1-9 ^m - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	 <p>See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Managing climate-related risks and opportunities", subpoint "Managing climate-related risks and opportunities" and "Identifying risks and opportunities", of this chapter.</p>	GRI 201-2
		ESRS 2 IRO-1 Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	<p>This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.5. "Pollution", of this chapter.</p>	

ESRS Topic	Aspect	Disclosure requirement		Evidence	Other Standards
ESRS E2 – Pollution	Impact, risk and opportunity management	E2-1 – Policies related to pollution		This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.5. "Pollution", of this chapter. See webpage " Corporate Responsibility Publications " page on our website to view the Environmental Policy and the Sustainable Sourcing Policy.	-
		E2-2 – Actions and resources related to pollution		This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.5. "Pollution", of this chapter.	
	Metrics and targets	E2-3 – Targets related to pollution	✓	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.5. "Pollution", of this chapter.	GRI 303-2
		E2-4 – Pollution of air, water and soil	✓	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.5. "Pollution", of this chapter.	GRI 2-27 GRI 305-7
		E2-5 – Substances of concern and substances of very high concern	✓	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.5. "Pollution", of this chapter.	
		E2-6 – Anticipated financial effects from pollution-related impacts, risks and opportunities	✓	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", of this chapter.	
ESRS E3 – Water and marine resources	Impact, risk and opportunity management	ESRS 2 IRO 1 - Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities		This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.3. "Water and marine resources", of this chapter.	GRI 303-1
		E3-1 – Policies related to water and marine resources		This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.1. "Our environmental-related policies", of this chapter.	
		E3-2 – Actions and resources related to water and marine resources		This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.3. "Water and marine resources", of this chapter.	GRI 303-1
	Metrics and targets	E3-3 – Targets related to water and marine resources	✓	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.3. "Water and marine resources", point "Water consumption" and subchapter 6. "Sustainability Commitments", section 6.1. "Commitments 2024-2026", of this chapter.	GRI 303-1
		E3-4 – Water consumption	✓	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.3. "Water and marine resources", point "Water consumption" and subchapter 6. "Sustainability Commitments", section 6.1. "Commitments 2024-2026", of this chapter.	GRI 303-3 GRI 303-4 GRI 303-5
		E3-5 – Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	✓	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1 "Climate change", point "Managing climate-related risks and opportunities", of this chapter.	
ESRS E4 – Biodiversity and ecosystems	Strategy	E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model		This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", of this chapter.	
		ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model		This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", of this chapter.	GRI 304-1
	Impact, risk and opportunity management	ESRS 2 IRO-1- Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and		This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", of this chapter.	GRI 304-1

ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
		opportunities		
		E4-2 – Policies related to biodiversity and ecosystems	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.1. "Our environmental-related policies", of this chapter.	-
		E4-3 – Actions and resources related to biodiversity and ecosystems	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", points "Fighting deforestation" and "Sustainable fishing strategy", of this chapter.	GRI 304-3
	Metrics and targets	E4-4 – Targets related to biodiversity and ecosystems	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", point "Fighting deforestation" and subchapter 6. "Sustainability commitments", of this chapter.	
		E4-5 – Impact metrics related to biodiversity and ecosystems change	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", of this chapter.	GRI 304-1 GRI 304-2 GRI 304-4
		E4-6 – Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	This topic was not identified as material, nonetheless it is partially reported. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", of this chapter.	
ESRS E5 - Resource use and circular economy	Impact, risk and opportunity management	ESRS 2 IRO-1 ^m – Description of the processes to identify and assess material resource use and circular economy related impacts, risks and opportunities	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resources use and circular economy", point "Managing circular economy-related risks and opportunities", of this chapter.	GRI 3-3 GRI 306-1
		E5-1 ^m - Policies related to resource use and circular economy	✓ See subchapter 3. "Environmental information", section 3.1. "Environment-related policies", of this chapter.	
		E5-2 ^m - Actions and resources related to resource use and circular economy	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resources use and circular economy", points " Managing circular economy-related risks and opportunities" and "Actions to promote circular economy", of this chapter.	GRI 3-3 GRI 306-2
ESRS E5 - Resource use and circular economy	Metrics and targets	E5-3 ^m - Targets related to resource use and circular economy	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resources use and circular economy", point " Materials used and resource outflows" and subchapter 6. "Sustainability Commitments", of this chapter.	GRI 3-3
		E5-4 ^m - Resource inflows	✓ This topic was not identified as material according to the updated dual materiality matrix for the 2024 report. For Jerónimo Martins Group, the material issue is related to product packaging.	GRI 301-1 GRI 301-2 GRI 306-1
		E5-5 ^m - Resource outflows	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resources use and circular economy", point " Materials used and resource outflows", subpoint "Waste management" and point " Actions to promote a circular economy", subpoint " Waste recovery from operations", of this chapter. See table below for the breakdown of the amount of hazardous and non-hazardous waste, by destination for 2024. Total amount of non-recycled waste: 96,438 tonnes (15.2% of total waste) The Jerónimo Martins Group does not produce radioactive waste.	GRI 306-2 GRI 306-3 GRI 306-4 GRI 306-5

Total amount of hazardous and non-hazardous waste by type of destination (2024)	Hazardous waste (tonnes)	Non-hazardous waste (tonnes)	Total (tonnes)
Preparation for reuse	0	0	0
Recycling	13	47,398	47,411
Other recovery operations	297	490,192	490,489
Incineration	8	300	308
Landfill	1	93,353	93,354
Other disposal operations	360	2,415	2,775
Total	679	633,658	634,337

ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
ESRS E5 - Resource use and circular economy	Metrics and targets	ES-6 ^m - Anticipated financial effects from resource use and circular economy-related risks and opportunities	 See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resources use and circular economy", points "Managing circular economy-related risks and opportunities" and "Materials used and resource outflows". See also subchapter 6. "Sustainability Commitments", of this chapter. The Group will take due diligence to meet the requirements of this indicator within the stipulated phase-in period.	
ESRS S1- Own workforce	Strategy	ESRS 2 SBM-2 ^m - Interests and views of stakeholders	 See subchapter 2. "General disclosures", section 2.3 "Stakeholder engagement and communication channels", of this chapter	
		ESRS 2 SBM-3 ^m - Material impacts, risks and opportunities and their interaction with strategy and business model	 See subchapter 2. "General disclosures", section 2.3. "Stakeholder engagement and communication channels", subsection 2.5. "Impacts, risks and opportunities management and double materiality assessment" and subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1 "Own workforce", of this chapter.	GRI 3-3 GRI 408-1 GRI 409-1
ESRS S1- Own workforce	Impact, risk and opportunity management	S1-1 ^m - Policies related to own workforce	 See subchapter 4. "Social Information", section 4.1. "Our social-related policies", subsection 4.1.1. "Own workforce", of this chapter.	GRI 2-23 GRI 2-25 GRI 2-29 GRI 3-3
		S1-2 ^m - Processes for engaging with own workers and workers' representatives about impacts	 See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Learning and skills development", subpoint "Personal empowerment", of this chapter	GRI 2-12 GRI 2-29 GRI 2-30 GRI 3-3
		S1-3 ^m - Processes to remediate negative impacts and channels for own workers to raise concerns	 See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Ethics and compliance", of this chapter.	GRI 2-25 GRI 3-3
		S1-4 ^m - Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	 See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", of this chapter.	GRI 2-24 GRI 3-3 GRI 203-2
	Metrics and targets	S1-5 ^m - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	 See subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	GRI 3-3
		S1-6 ^m - Characteristics of the undertaking's employees	 See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Our employees", of this chapter.	GRI 2-7 GRI 401-1
ESRS S1- Own workforce	Metrics and targets	S1-7 ^m - Characteristics of non-employee workers in the undertaking's own workforce	 See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Workers who are not employees", of this chapter.	GRI 2-8
		S1-8 ^m - Collective bargaining coverage and social dialogue	 In Portugal, only a residual number of employees are not covered by a collective bargaining agreement. In Poland and Colombia, where there are no collective bargaining instruments applicable to our companies, working conditions and the way in which the employment contract is executed	GRI 2-30

ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
			are regulated by the respective legal systems (which regulate all these issues internally) and by the internal, local and global policies in force within our Group. Our internal policies are fully aligned with the best international labour practices, in particular with regard to the fundamental conventions of the International Labour Organisation. In Portugal, we actively participate through sectoral employers' associations, such as APED (Associação de Empresas de Distribuição de Portugal) and transversal to various industries, such as CIP (Confederação Empresarial de Portugal). We also contribute to the sectorial social dialogue at European level promoted by the European Commission through our membership in the EuroCommerce association. See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Ethics and compliance" of this chapter.	

	Collective Bargaining Coverage		Social dialogue
	Employees – EEA*	Employees – Non-EEA	Workplace representation (EEA only)
0% -19%	Poland*	Colombia*	-
20% - 39%	-	-	-
40% - 59%	-	-	-
60% -79%	-	-	-
80% - 100%	Portugal	-	Portugal and Poland



*EEA – European Economic Area.

*In Poland and Colombia there are no collective regulation instruments applicable to the Group's companies.

ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
ESRS S1-Own workforce		S1-9 ^m — Diversity metrics	✓ See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Diversity and inclusion" of this chapter.	GRI 405-1
	Metrics and targets	S1-10 ^m - Adequate wages	✓ See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Compensation and benefits", of this chapter.	GRI 202-1
		S1-11 ^m – Social protection	✓ See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Support to employees and their families", of this chapter.	GRI 401-2
		S1-12 – Persons with disabilities	✓ This disclosure requirement was not identified as a material, nonetheless, we provide information on our actions in subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Diversity and inclusion", of this chapter.	
		S1-13 ^m – Training and skills development metrics	✓ See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Training and skills development", subpoint "Training", of this chapter.	GRI 404-1 GRI 404-3

Average hours of training per employee *	Women	Men	Total
Group	63	68	64
Strategic	33	14	20
Managerial	34	35	35
Operational	63	70	65

* Hours of training per employee – quotient of the volume of training by the total number of employees.


ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
		S1-14 ^m – Health and safety Metrics	 See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Health and safety at work", of this chapter. The Group will take due diligence to comply with the requirements of this indicator, particularly with regard to workers in the value chain.	GRI 403-8 GRI 403-9 GRI 403-10
		S1-15 ^m – Work-life balance Metrics	 See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Work-life balance" of this chapter.	GRI 401-3 GRI 403-6

Parental leave	Gender		Total
	Women	Men	
Employees entitled to parental leave	106,326	33,532	139,858
Employees who have taken parental leave	3,829	1,142	4,971
Employees who returned from parental leave	1,985	1,040	3,025
Employees who returned from parental leave and who remained in the Group 12 months after returning	2,391	778	3,169
Return to work rate *	51.8%	91.1%	60.9%
Rate of employees still on parental leave **	33.6%	8.0%	27.7%
Retention rate ***	83.5%	74.4%	81.0%

* The return-to-work rate is the percentage of employees who returned from parental leave based on employees who took parental leave during the period.

** The rate of employees who are still on parental leave corresponds to the percentage of employees who have not yet returned from leave, based on employees who have taken parental leave in the period.

***The retention rate corresponds to the percentage of employees who returned from parental leave in 2023 and who remain working in the Group 12 months later.

ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
ESRS S1 - Own workforce	Metrics and targets	S1-16 ^m – Compensation metrics (pay gap and total compensation)	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Diversity and inclusion" of this chapter. Concerning the ratio between the remuneration of the highest paid individual and the median remuneration of employees, due to the complexity in standardizing salary information caused by the geographic dispersion of the Group that was amplified in 2024, the immediate incomparability of functions in different countries and the dissimilarity of remuneration concepts in the several Group Companies, it is fundamental to find a base to calculate this indicator that prevents it from being misleading. The Group is taking all due diligences to fulfil the requirements of this ratio, guaranteeing the quality of the information disclosed.	GRI 2-21 GRI 405-2
		S1-17 ^m – Incidents, complaints and severe human rights impact	 See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Ethics and compliance" of this chapter.	GRI 2-25 GRI 2-27 GRI 406-1
ESRS S2 - Workers in the value chain	Strategy	ESRS 2 SBM-2- Interests and views of stakeholders	This topic was not identified as a material topic. In any case, it is partially reported. See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.4. "Workers in the value chain", of this chapter.	
ESRS S2 - Workers in the value chain	Metrics and targets	ESRS 2 SBM-3- Material impacts, risks and opportunities and their interaction with strategy and business model	This topic was not identified as a material topic. In any case, it is partially reported, see subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.4. "Workers in the value chain", of this chapter.	GRI 408-1
ESRS S2 – Workers in the value chain	Impact, risk and opportunity management	S2-1 – Policies related to value chain workers	This topic was not identified as a material topic. In any case, it is partially reported. See subchapter 4. "Social Information", section 4.1. "Our social-related policies", subsection 4.1.4. "Workers in the value chain" of this chapter.	GRI 2-23 GRI 2-24 GRI 2-25 GRI 2-29
		S2-2 – Processes for engaging with value chain workers about impacts	This topic was not identified as a material topic. In any case, it is partially reported. See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.4. "Workers in the value chain", "Responsible labour management in the value chain" and "Sustainability certification" of this chapter.	GRI 2-12 GRI 2-29
	Impact, risk and opportunity management	S2-3 – Processes to remediate negative impacts and channels for value chain workers to	This topic was not identified as a material topic. In any case, it is partially reported. See subchapter 2. "General disclosures", section 2.3. "Stakeholder engagement and communication channels", and subchapter 3. "Environmental information", section 3.3. "Disclosures pursuant to Article 8 of	GRI 2-25 GRI 2-29

ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
ESRS S2 - Workers in the value chain	Impact, risk and opportunity management	raise concerns S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers and effectiveness of those action	Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection 3.3.5 "Minimum safeguards", of this chapter. This topic was not identified as a material topic. In any case, it is partially reported. See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.4. "Workers in the value chain", "Responsible labour management in the value chain" and "Sustainability certification" of this chapter.	GRI 2-24 GRI 2-25 GRI 203-2 GRI 204-1
	Metrics and targets	S2-5 – Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities	This topic was not identified as a material topic. In any case, it is partially reported. See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.4. "Workers in the value chain", of this chapter.	
ESRS S3 - Affected Communities	Strategy	ESRS 2 SBM-2 ^m – Interests and views of stakeholders	✓ See subchapter 2. "General disclosures", section 2.3. "Stakeholder engagement and communication channels", of this chapter.	
		ESRS 2 SBM-3 ^m Material Impacts, risks and opportunities and their interaction with strategy and business model	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.2. "Affected communities" and subchapter 3. "Environmental information", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", of this chapter. The risk management mechanisms are described in chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure, Organization and Corporate Governance", section C "Internal Organization", subsection III – "Internal Control and Risk Management", 53. "Identification and Description of the Main Types of Risks (Economic, Financial, and Legal) to which the Company is Exposed in the Course of its Activity".	GRI 3-3 GRI 413-2
ESRS S3 - Affected Communities	Impact, risk and opportunity management	S3-1 ^m - Policies related to affected communities	✓ See subchapter 4. "Social Information", section 4.1. "Our social-related policies", subsection 4.1.2. "Affected communities", of this chapter.	GRI 2-23 GRI 2-29 GRI 3-3
		S3-2 ^m - Processes for engaging with affected communities about impacts	✓ See subchapter 4. "Social Information", 4.2. Managing social topics", subsection 4.2.2. "Affected communities", point "How we dialogue with affected communities", of this chapter.	GRI 2-12 GRI 2-29 GRI 3-3
ESRS S3- Affected Communities	Impact, risk and opportunity management	S3-3 - Processes to remediate negative impacts and channels for affected communities to raise concerns	✓ See subchapter 2. "General disclosures", section 2.3. "Stakeholder engagement and communication channels", and subchapter 3. "Environmental information", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection 3.3.5 "Minimum safeguards", of this chapter.	GRI 2-25
		S3-4 ^m - Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities and effectiveness of those actions	✓ See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.2. "Affected communities", points "Direct support for affected communities", "Programmes and projects to engage and support affected communities", point "Indirect support for affected communities" and subchapter 3. "Environmental information", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection 3.3.5 "Minimum safeguards" of this chapter. The risk management mechanisms are described in Chapter 4 "Corporate Governance", Part I – "Information on Shareholder Structure, Organization, and Corporate Governance." Section C "Internal Organization", Subsection III – "Internal Control and Risk Management", 53. "Identification and Description of the Main Types of Risks (Economic, Financial, and Legal)" to which the Company is Exposed in the Course of its Activity.	GRI 2-24 GRI 3-3 GRI 203-2 GRI 413-1
ESRS S3- Affected Communities	Metrics and targets	S3-5 ^m – Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities	✓ See subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	GRI 3-3

ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
ESRS S4-Consumers and end-users	Strategy	ESRS 2 SBM-2 ^m – Interests and views of stakeholders	✓ See subchapter 2. "General disclosures", section 2.3. "Stakeholder engagement and communication channels", of this chapter.	
ESRS S4-Consumers and end-users	Strategy	ESRS 2 SBM-3 ^m – Impactos, riscos e oportunidades materiais e a sua interação com a estratégia e o modelo de negócios	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", subchapter 3. "Environmental information", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection 3.3.5 "Minimum safeguards" of this chapter. The risk management mechanisms are described in chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure. Organization. and Corporate Governance", section C "Internal Organization", subsection III – "Internal Control and Risk Management", 53. "Identification and Description of the Main Types of Risks (Economic. Financial. and Legal)" to which the Company is Exposed in the Course of its Activity.	GRI 3-3
	Impact. risk and opportunity management	S4-1 ^m – Policies related to consumers and end-users	✓ See subchapter 4. "Social Information", section 4.1. "Our social-related policies", subsection 4.1.3. "Consumers and end-users", of this chapter.	GRI 2-23 GRI 2-25 GRI 2-29
ESRS S4-Consumers and end-users	Impact. risk and opportunity management	S4-2 ^m – Processes for engaging with consumers and end-users about impacts	✓ See subchapter 4. "Social Information", section 4.2 "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Engaging with consumers", of this chapter.	GRI 2-12 GRI 2-29 GRI 3-3
		S4-3 ^m – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	✓ See subchapter 2. "General disclosures", section 2.3. "Stakeholder engagement and communication channels" and subchapter 3. "Environmental information", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection 3.3.5 "Minimum Safeguards" and subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Remediating impacts and channels for consumers to raise concerns", of this chapter.	GRI 2-25 GRI 3-3
ESRS S4-Consumers and end-users	Impact. risk and opportunity management	S4-4 ^m – Taking action on material impacts on consumers and end-users. and approaches to managing material risks and pursuing material opportunities related to consumers and end users. and effectiveness of those actions	✓ See subchapter 3. "Environmental information", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection 3.3.5 "Minimum Safeguards", 4. subchapter "Social Information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Actions towards our consumers", of this chapter. The risk management mechanisms are described in Chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure. Organization. and Corporate Governance." Section C "Internal Organization", Subsection III – "Internal Control and Risk Management", 53. "Identification and Description of the Main Types of Risks (Economic. Financial. and Legal)" to which the Company is Exposed in the Course of its Activity.	GRI 2-24 GRI 2-25 GRI 3-3 GRI 203-2
	Metrics and targets	S4-5 ^m – Targets related to managing material negative impacts. advancing positive impacts. and managing material risks and opportunities	✓ See subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	GRI 3-3
ESRS G1-Business Conduct	Governance	ESRS 2 GOV-1 ^m – The role of the administrative. supervisory and management bodies	✓ See subchapter 2. "General disclosures", section 2.2. "Governance and strategy". See chapter 4 "Corporate Governance", Part I - "Information on Shareholder Structure, Organisation and Corporate Governance", sections A "Shareholder Structure", B "Governing Bodies and Committees" and C "Internal Organisation".	GRI 2-9 GRI 2-12
ESRS G1-Business Conduct	Impact. risk and opportunity management	ESRS 2 IRO-1 ^m – Description of the processes to identify and assess material impacts. risks and opportunities	✓ See subchapter 2. "General disclosures", section 2.3. "Stakeholder engagement and communication channels", of this chapter. See subchapter 5. "Governance information", section 5.2. "Business conduct", of this chapter.	GRI 2-23 GRI 2-24 GRI 2-25 GRI 2-26
		G1-1 ^m – Corporate culture and Business conduct policies and corporate culture	✓ See subchapter 5. "Governance information", section 5.1. "Our business conduct policies", of this chapter.	GRI 2-16 GRI 2-23 GRI 2-24 GRI 2-26













ESRS Topic	Aspect	Disclosure requirement	Evidence	Other Standards
				GRI 3-3 GRI 205-1 GRI 205-2
		G1-2 ^m – Management of relationships with suppliers	✓ See subchapter 5. "Governance information", section 5.2. "Business conduct", of this chapter.	GRI 3-3 GRI 204-1 GRI 308-1 GRI 414-1
ESRS G1- Business Conduct	Impact, risk and opportunity management	G1-3 – Prevention and detection of corruption and bribery	✓ This disclosure requirement was not identified as material, nonetheless it is partially reported. See subchapter 2. "General disclosures" of section 2.2. "Governance and strategy" and subchapter 3. "Environmental information", section 3.3 "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection 3.3.5 'Minimum safeguards', of this chapter. See chapter 4 "Corporate Governance", Part I - "Information on Shareholder Structure, Organisation and Corporate Governance", sections A "Shareholder Structure", B "Governing Bodies and Committees", C "Internal Organisation" and section E "Related Party Transactions".	GRI 2-13 GRI 2-26 GRI 205-1 GRI 205-2
	Metrics and targets	G1-4 – Confirmed incidents of corruption or bribery	✓ This disclosure requirement was not identified as material, nonetheless it is partially reported. For information on these matters, see the reports on indicators GRI 2-27 e GRI 206-1. See the Anti-Corruption Policy, the Plan for the Prevention of Risks of Corruption and Related Offences (a document that identifies and classifies the company's main and potential risks in terms of corruption, considering the likelihood of occurrence and the impact of the risks identified, and lists the prevention and mitigation measures that the company has adopted to minimise the likelihood of occurrence and the foreseeable impact, in compliance with its regulatory compliance programme) published in 2022, and the Annual Implementation Report for this plan, published in 2024, available on our website . We are improving our reporting processes in order to respond to socio-economic compliance indicators.	GRI 2-27 GRI 206-1
		G1-5 – Political influence and lobbying activities	✓ This disclosure requirement was not identified as material. Nonetheless, Jerónimo Martins Group companies do not support political parties or their representatives, nor do they contribute financially to groups that may support party interests. See Code of Conduct available on our website .	GRI 2-9 GRI 415-1
		G1-6 ^m – Payment practices	✓ See subchapter 5. "Governance information", section 5.2. "Business conduct", 5.2.4. "Supplier payment practices and initiatives", of this chapter	

^m - Material requirement.

7.2. GRI (Global Reporting Initiative)

SUMMARY OF CONTENT GRI: Statement of use: Jerónimo Martins reports in accordance with the GRI Standards for the period between January 1 and December 31, 2024; **GRI 1 used:** GRI 1: Fundamentals 2021; **GRI Sector Standard(s) applied:** GRI Sector Standard(s) were not used.

GRI Standard	Description	Evidence	Other Standards
GENERAL DISCLOSURES			
2-1	Organizational details.	✓ Jerónimo Martins, SGPS, S.A. Rua Actor António Silva n.º 7, 1649-033 Lisboa, Portugal. Refer to chapter 1 "The Jerónimo Martins Group".	---
2-2	Entities included in the organization's sustainability reporting.	✓ See chapter 1 "The Jerónimo Martins Group", chapter 3 "Financial Statements" and chapter 4 "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance".	ESRS 2 BP-1
2-3	Reporting Period, frequency and contact point.	✓ This Jerónimo Martins Group Report covers the period from 1 st January to 31 st December 2024. The Sustainability Statement (included in the Annual Report) is annual. Contact point is: comunicacao@jeronimo-martins.com	---
2-4	Restatements of information.	✓ <ul style="list-style-type: none"> Where it reads "30,249" in the 2023 Annual Report (chapter 5 "Corporate Responsibility in Value Creation", subchapter 5. "Supporting Surrounding Communities", section 5.3. "Direct Support", in what concerns the support granted by Hebe, it should be read "30,265". All corrected figures for 2023 are duly marked in the current report. Where it reads "5,301" in the 2023 Annual Report (chapter 5 "Corporate Responsibility in Value Creation", subchapter 5. "Supporting Surrounding Communities", section 5.3. "Direct Support", in what concerns the weight of Pingo Doce food donations it should be read "5,299". All corrected figures for 2023 are duly marked in the current report. In the 2024 Annual Report, there was a need to review some values related to the carbon footprint to improve alignment with the Greenhouse Gas Protocol methodology. Thus, regarding the specific value (scopes 1 and 2), where it reads "0.0303" in the 2023 report and accounts (chapter 5 "Corporate Responsibility in Value Creation", subchapter 3. "Respecting the environment", section 3.1. "Combating Climate Change", subsection 3.1.2. Carbon footprint), it should be read "0.0304". In relation to the global carbon footprint (Scopes 1 and 2) by GHG, where it reads "928,904" it should be read "929,714", in relation to the carbon footprint (Scope 1 – direct impacts), where it reads "240,466" it should be read "240,592", while in relation to the carbon footprint (Scope 2 – indirect impacts) where it reads "688,438" it should be read "689,122" and finally in the carbon footprint (Scope 3 – other indirect impacts) where it reads "32,593,713" it should be read "31,228,412". Consequently, several categories within these indicators were affected. All corrected figures for 2023 are duly marked in the current report. In the 2023 Annual Report, in chapter 5 "Corporate Responsibility in Value Creation", subchapter 3. "Respecting the environment", section 3.4. 'Promoting a circular economy', point 3.4.2. Materials consumed and reduction initiatives, the value of Recheio referring to the total consumption of materials was revised due to an update of the calculations. Thus, regarding the total value of Recheio "13,292" it should be read "13,326". Thus, the total value for the Jerónimo Martins Group increases from "520,095" to "520,129". All corrected figures for 2023 are duly marked in the current report. 	ESRS 2 BP-2
2-5	External assurance	✓ The information contained and marked in this table with "✓" has been verified by an external third party: Ernst & Young Audit & Associados – SROC. S.A. The verification process report can be consulted at the end of chapter 5 "Sustainability Statement".	
2-6	Activities, value chain and other business relationships.	✓ See chapter 1 "The Jerónimo Martins Group", chapter 3 "Financial Statements". Subchapter 5. "Governance information", section 5.2. "Business conduct", of this chapter. and to channel "Responsibility", and page "Our Responsibility Strategy" on the website https://www.jeronimomartins.com/en/ .	ESRS 2 SBM-1
2-7	Employees.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Our employees", of this chapter.	UNGC 6 SDG 8 e 10 ESRS 2 SBM-1 ESRS S1-6
2-8	Workers who are not employees.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Workers who are not employees", of this chapter.	UNGC 6 SDG 8 ESRS S1-7
2-9	Governance structure and composition.	✓ See chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance".	SDG 5 e 16 ESRS 2 GOV-1 ESRS G1-5
2-10	Nomination and selection of the highest governance body.	✓ See chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section A "Shareholder Structure" and B "Corporate Bodies and Committees".	SDG 5 e 16
2-11	Chair of the highest	✓	SDG 5 e 16

GRI Standard	Description	Evidence	Other Standards
	governance body.		
2-12	Role of the highest governance body in overseeing the management of impacts.	 <p>See chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section A "Shareholder Structure", B "Corporate Bodies and Committees" and C "Internal Organisation". See subchapter 2. "General disclosures", of this chapter. See also page "Our Responsibility Strategy", subpage "Defining our Priorities", on the website https://www.jeronimomartins.com/en/.</p>	SDG 16 ESRS 2 GOV-1 ESRS 2 GOV-2 ESRS 2 SBM-2 ESRS S1-2 ESRS S2-2 ESRS 3-2 ESRS 4-2
2-13	Delegation of responsibility for managing impacts.	 <p>See chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section A "Shareholder Structure", B "Corporate Bodies and Committees" and C "Internal Organisation".</p>	ESRS 2 GOV-1 ESRS 2 GOV-2 ESRS G1-3
2-14	Role of the highest governance body in sustainability reporting..	 <p>The approval of the Corporate Responsibility Report, included in the Annual Report, is a responsibility of the Shareholders' General Meeting.</p>	ESRS 2 GOV-1 ESRS 2 GOV-5
2-15	Conflicts of interest.	 <p>See channel "Responsibility", page "Corporate Responsibility Publications" to consult the Jerónimo Martins Code of Conduct and Code of Conduct for Suppliers on the website https://www.jeronimomartins.com/en/. See channel "Investors", page "Corporate Governance", subpage "Specialised Committees" on the website https://www.jeronimomartins.com/en/. The Anti-Corruption Policy and the Plan for the Prevention of Risks of Corruption and Related Infractions (a document that identifies and classifies the main and potential risks of the company in terms of corruption, considering the probability of occurrence and the impact of the identified risks, and lists the prevention and mitigation measures that the company adopted to minimize the probability of occurrence and the predictable impact, in compliance with its regulatory compliance program) published in 2022, and the annual report on the implementation of the plan, published in 2024, for the prevention of corruption risks and related offences are both available for consultation on the "About Us" channel at https://www.jeronimomartins.com/en/.</p>	SDG 16
2-16	Communication of critical concerns.	 <p>Refer to chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance".</p>	ESRS 2 GOV-2 ESRS G1-1
2-17	Collective knowledge of the highest governance body.	 <p>The Group carries out activities (e.g. internal and external training sessions, Sustainability Conference, internal newsletters and progress reports) that enable its management bodies to become more aware of sustainability topics. Additionally, in 2019 Sustainability Committees were created for all our Food Retail, Specialized Retail and Agribusiness Companies, with 19 meetings taking place in 2024. Refer to chapter 5. "Sustainability Statement" and chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section B "Corporate Bodies and Committees", subsection II "Management and Supervision (Board of Directors)".</p>	ESRS 2 GOV-1
2-18	Evaluation of the performance of the highest governance body.	 <p>See chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section D "Remuneration".</p>	
2-19	Remuneration policies.		ESRS 2 GOV-3
2-20	Process to determine remuneration.	 <p>See chapter 4 "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section D "Remuneration".</p>	SDG 16 ESRS 2 GOV-3
2-21	Annual total compensation ratio.	<p>Due to the complexity in standardizing salary information caused by geographic dispersion, the immediate incomparability of functions in different countries and the dissimilarity of remuneration concepts in the several Group Companies, it is fundamental to assure the quality of information before disclosing this indicator. The Group will take due diligence to fulfil the requirements of this indicator, as far as possible, by the next reporting period.</p>	ESRS S1-16
2-22	Statement on sustainable development strategy.	 <p>See "Message from the Chairman".</p>	ESRS 2 BP-2 ESRS 2 SBM-1
2-23	Policy commitments.		UNGC 1-10 SDG 16 ESRS 2 GOV-2 ESRS 2 IRO-1 ESRS S1-1 ESRS S1-3 ESRS S1-4
2-24	Embedding policy commitments.	 <p>"Sustainability commitments", of this chapter.</p>	

GRI Standard	Description	Evidence	Other Standards
2-25	Processes to remediate negative impacts.	✓	ESRS S1-17 ESRS S2-1 ESRS S2-3 ESRS S2-4 ESRS S3-1 ESRS S3-3 ESRS S3-4 ESRS S4-1 ESRS S4-4 ESRS G1-1 ESRS G1-3
2-26	Mechanisms for seeking advice and raising concerns.	✓	
2-27	Compliance with laws and regulations	<p>For information on this matter, refer to GRI 206-1. With regard to non-compliance with environmental laws and regulations, there were no significant fines*. We are improving our reporting processes in order to respond to socio-economic compliance indicators.</p> <p>* A significant fine is considered to be a monetary amount equal to or greater than approximately 45,000.00 euros.</p>	ESRS E2-4 ESRS S1-17 ESRS G1-4
2-28	Membership associations.	✓	---
2-29	Approach to stakeholder engagement.	✓	ESRS SBM 2-3 ESRS 2 SBM-2
2-30	Collective bargaining agreements.	✓	UNGC 3 SDG 8 ESRS S1-1 ESRS S1-8
MATERIAL ASPECTS			
3-1	Process to determine material topics.	✓	ESRS 2 BP-1
3-2	List of material topics.	✓	ESRS 2 BP-2
3-3	Management of material topics.	✓	ESRS 2 BP-2 ESRS 2 SBM-1
ECONOMIC PERFORMANCE			
201-1	Direct economic value generated and distributed.	Refer to chapter 3 "Financial Statements" and indicator 203-1.	SDG 8 e 9 ESRS 2 SBM-1
201-2	Financial implications and other risks and opportunities due to climate change.	Refer to chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section C "Internal Organisation", subsection III – "Internal Control and Risk Management", 53. "Details and Description of the Major Economic, Financial and Legal Risks to which the Company is Exposed in Pursuing Its Business Activity" and subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", of this chapter.	UNGC 7 SDG 13
201-3	Defined benefit plan obligations and other retirement plans.	Refer to chapter 3 "Financial Statements" and chapter 4 "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section D "Remuneration".	---
201-4	Financial assistance received from government.	<p>In Poland, the last part of a grant from the European Union was received under a signed consortium agreement related to the development of innovative logistics systems (concerning an application made in 2023). The total amount amounted to EUR 279,932.29 (PLN 1,205,080.50), of which EUR 98,079.42 (PLN 422,222.10) was received in 2024. A tax benefit for robotization of EUR 85,549.03 (PLN 368,280.00) was also obtained.</p> <p>In Portugal, the benefits granted by official entities, as a tax credit, were aimed at offsetting investments made under the SIFIDE II programme - Tax Incentive System for Business Research & Development. This programme consists of a deduction from income tax of part of the amounts incurred in staff costs, operating costs, costs of contracting Innovation and Development (R&D) and costs of acquiring fixed assets to support R&D activity, which are certified by an external and independent entity.</p> <p>In this context, the indicators under consideration are as follows:</p> <ul style="list-style-type: none"> With reference to the 2024 tax year, in terms of SIFIDE II: at this level, and for the nine Companies of the Jerónimo Martins Group ("GJM") that submitted applications to SIFIDE II, with reference to the 2023 tax year (namely, JMR - Prestação de Serviços para a Distribuição, S.A. ("JMR"), Jerónimo Martins Serviços, S.A. ("JMS"), Seaculture Aquicultura, S.A. ("Seaculture"), Terra Alegre 	---

			<p>Lactínios, S.A. ("TAL"), Best Farmer - Actividades Agro-Pecuárias, S.A. ("Best Farmer"), Jerónimo Martins Agro-Alimentar, S.A. ("JMA"), Jerónimo Martins, SGPS, S.A. ("JMH"), Outro Chão Agricultura Biológica, Lda, ("Outro Chão") and Recheio - Cash & Carry, S.A. ("Recheio")), the amount of potential tax credit requested was EUR 4,873,041.</p> <ul style="list-style-type: none"> Total investment in R&D in the year 2024: In this particular context, and based on the amounts reported in the IPCTN23 - Survey of National Scientific and Technological Potential, by the GJM companies for which we assisted in completing the survey (namely JMR, JMS, Seaculture, TAL, Best-Farmer, JMA, JMH, Outro chão, Recheio e Pingo Doce), the total amount reported in this regard totalled EUR 11,452,863. <p>In Colombia, there were no financial incentives (in the form of tax benefits/credits) granted by official entities to our operations.</p>	
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MARKET PRESENCE

202-1	Ratios of standard entry level wage by gender compared to local minimum wage.	✓	<p>Regarding workers who are not employees, we do not have consolidated information that allows us to assess whether the type of functions performed are subject to minimum wage rules.</p> <p>See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Compensation and benefits", of this chapter.</p>	<p>UNGC 6 SDG 1. 5 e 8 ESRS S1-10</p>
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Ratios of standard entry level wage compared to local minimum wage*		
	Women	Men
Portugal	101.2%	101.2%
Poland	100.0%	100.0%
Colombia	100.0%	100.0%

*The lowest salaries of the companies with the highest representation in each country are considered. i.e. Pingo Doce (Portugal), Biedronka (Poland) and Ara (Colombia).

GRI Standard	Description	Evidence	Other Standards
202-2	Proportion of senior management hired from the local community.	✓	<p>See table below.</p> <p>UNGC 6 SDG 8</p>


Proportion of senior management hired from the local community*		
2024		
Group		81.6%
Portugal		90.7%
Poland		76.1%
Colombia		66.7%
Slovakia		28.6%**
Czechia		***

* For the calculation of this percentage, employees who are part of the strategic functional level are considered. Hiring people whose nationality is the same as the country where the employee works is considered local.

** As part of the Group's expansion into Slovakia, and Biedronka's knowledge sharing in Poland with the new country, the majority of employees at the strategic functional level are Polish.



***There are no employees of the strategic functional level in Czechia.

GRI Standard	Description	Evidence	Other Standards
INDIRECT ECONOMIC IMPACTS			
203-1	Infrastructure investments and services supported.	✓	SDG 5. 9 e 11
203-2	Significant indirect economic impacts.	✓	SDG 1. 3 e 8
PROCUREMENT PRACTICES			
204-1	Proportion of spending on local suppliers.	✓	SDG 8
ANTI-CORRUPTION			
205-1	Operations assessed for risks related to corruption.	Refer to chapter 4 "Corporate Governance", Part I – "Information on Shareholder Structure. Organisation and Corporate Governance", section C "Internal Organisation" and section E "Related Party Transactions".	UNGC 10 SDG 16

GRI Standard	Description	Evidence	Other Standards
		See subchapter 2. "General disclosures", section 2.6. "Our policies", and subchapter 3. "Environmental information", section 3.3 "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection 3.3.5 "Minimum safeguards", and subchapter 5. "Governance information", section 5.2 "Business conduct", subsection 5.2.1 "Selection and monitoring of suppliers", of this chapter. Our Plan for the Prevention of Corruption Risks and Related Offences (a document that identifies and classifies the Company's main and potential risks in terms of corruption, considering the likelihood of occurrence and the impact of the risks identified, and lists the prevention and mitigation measures that the company has adopted to minimise the likelihood of occurrence and the foreseeable impact, in compliance with its regulatory compliance programme) published in 2022, and the Annual Report on the Implementation of this plan , published in 2024, documents available for consultation on the 'About Us' channel at https://www.jeronimomartins.com/en . In addition, in 2023 we approved the Integrity Due Diligence Procedure, as an autonomous internal document aimed at assessing risks related to corruption in the supply chain. Risk assessment in the supply chain is also assessed through social audits whose criteria include this issue.	
205-2	Communication and training about anticorruption policies and procedures.	 <p>There was a significant increase in the training promoted on the Anti-Corruption Policy (+47.1% of training hours than in 2023), reaching 21,953 employees, as well as in the number of employees impacted by communication campaigns (42,477). Several communication campaigns on the Anti-Corruption Policy were carried out throughout the year, which in Portugal were aimed at all employees and in Poland, Colombia and Slovakia were aimed at headquarters' employees. Since different communication channels were used, including physical ones (e.g. posters), the average headcount in each country throughout 2024 was considered to calculate this percentage. We continue to improve our systems to ensure that we report information by functional level. See table below and subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Ethics and compliance", of this chapter.</p>	UNGC 10 SDG 16

Communication about Anti-Corruption Policy		
	Total	%
Group	42,477	30.4%
Portugal	35,454	100.1%*
Poland	4,711	5.3%
Colombia	2,252	14.1%
Slovakia	60	33.7%

*The average headcount in Portugal is higher than the headcount recorded on 31/12/2024 (35,433 employees)

GRI Standard	Description	Evidence	Other Standards
ANTI-COMPETITIVE BEHAVIOUR			
206-1	Legal actions for anticompetitive Behavior, Antitrust, and monopoly practices.	See chapter 3. "Financial Statements", subchapter 3.1, "Consolidated Financial Statements", 23. "Contingencies, contingent assets and contingent liabilities" for a description of major legal proceedings (amounted higher than 5 million euros) pending resolution, for which the Board of Directors, supported by the opinion of its lawyers and tax advisors, considers that there is enough ground for its appeal in court.	---
MATERIALS			
301-1	Materials used by weight or volume.	 <p>See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resources use and circular economy", point "Materials used and resource outflows".</p>	UNGC 7 e 8 SDG 8 e 12 ESRS E5-4
301-2	Recycled input materials used.		UNGC 7 e 8 SDG 8 e 12 ESRS E5-4
301-3	Reclaimed products and their packaging materials.	This aspect was considered non-material. Nevertheless, the Group promotes the collection of waste from customers in its stores, sending it for recovery. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resources use and circular economy", point "Materials used and resource outflows".	UNGC 8 SDG 8 e 12
ENERGY			
302-1	Energy consumption within the organization.	 <p>See table below.</p>	UNGC 7, 8 e 9 SDG 7, 8, 12 e 13

Total consumption (GJ)	2024	2023	Δ 2024/2023
Energy consumption by type:	7,943,532	8,010,628	-0.8%
Electricity*	6,806,190	6,545,154	+4.0%
Fuels	1,010,019	1,316,381	-23.3%
Heating*	127,323	149,093	-14.6%
Renewable Energy	4,253,082	3,592,316	+18.4%
Electricity	4,234,747	3,573,631	+18.5%
Heating	18,335	18,685	-1.9%

* It includes renewable energy generation for self-consumption, Guarantees of Origin, Renewable Power Purchase Agreements and the percentage of renewable energy in each energy supplier's energy mix.

GRI Standard	Description	Evidence	Other Standards
302-2	Energy consumption outside of the organization.	This indicator is presented in the form of CO ₂ e as part of the calculation of the Group's carbon footprint – scope 3 emissions for all categories according to the GHG Protocol – Corporate Value Chain methodology. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", point "Carbon footprint", of this chapter.	UNGC 7 e 8 SDG 7, 8, 12 e 13
302-3	Energy intensity.	✓ In 2024, the intensity indicator was 0.237 GJ/thousand euros of sales, representing 9.5% less compared to 2023. In 2023, the intensity indicator was 0.262 GJ/thousand euros of sales.	UNGC 8 SDG 7, 8, 12 e 13
302-4	Reduction of energy consumption.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", point "Energy consumption management", of this chapter.	UNGC 8 e 9 SDG 7, 8, 12 e 13
302-5	Reductions in energy requirements of products and services.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", point "Energy consumption management", of this chapter.	UNGC 8 e 9 SDG 7, 8, 12 e 13
WATER			
303-1 (2018)	Interactions with water as a shared resource.	✓	UNGC 7 e 8 SDG 6 e 12
303-2 (2018)	Management of water discharge-related impacts.	✓	
303-3 (2018)	Water withdrawal.	✓	UNGC 8 SDG 6 e 12
303-4 (2018)	Water discharge.	✓	UNGC 8 SDG 6
303-5 (2018)	Water consumption.	✓	UNGC 7 e 8 SDG 6

Total consumption (megalitres/million euros in sales)	2024	2023	Δ 2024/2023
Overall specific value	0.189	0.212	-11.1%
Specific value (Distribution)	0.102	0.106	-4.7%
Specific value (Agribusiness)	20.386	28.711	-29.0%

Total withdrawal (megalitres)	2024	2023	Δ 2024/2023
Water withdrawal by source**	6,315.0	6,500.4	-2.9%
Municipal and private supply system	6,002.5	6,165.9	-2.7%
Groundwater	294.0	316.4	-7.1%
Surface water (including rainwater)	18.5	18.1	+2.2%

* The total volume captured corresponds to fresh water.

Recycled water (megalitres)	2024	2023	Δ 2024/2023
Total recycled water*	2.8	2.4	+18.5%

* Only Ara.

Total wastewater (megalitres)	2024	2023	Δ 2024/2023
Wastewater disposal by type of destination*	2,927.1	2,809.0	+4.2%
Municipal Sewage	2,874.2	2,757.2	+4.2%
Environment	52.9	51.8	+2.3%

* It is estimated that fresh water represents less than 0.5% of the rejected volume.

Total water consumption (megalitros)	2024	2023	Δ 2024/2023
Water consumption by business unit	3,387.9	3,691.4	-8.2%

GRI Standard	Description	Evidence	Other Standards
BIODIVERSITY			
304-1	Operational sites owned, Leased, managed in, or adjacent to, Protected areas and areas of high biodiversity value outside protected areas.	The Jerónimo Martins Group's infrastructures comply with legal requirements in environmental matters and, for the most part, are contextualized in an urban network. In the particular field of agri-food, the Group owns properties occasionally located or close to the National Ecological Network, collaborating with government entities to ensure their conservation.	UNGC 8 SDG 6, 14 e 15
304-2	Significant impacts of activities, products, and services on biodiversity.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", points "Fighting deforestation" and "Sustainable fishing strategy", of this chapter.	UNGC 8 SDG 6, 14 e 15
304-3	Habitats protected or restored.	Not applicable to the Group's activities in 2024. Nevertheless, the Group participates in a number of initiatives for the conservation of habitats and ecosystems such as the Green Heart of Cork (ANP WWF), cleaning of the Tatra Mountains (Czysta Polska), Salamandra – Polish Society for the Conservation of Nature, protection of bees (Fundabejazz) and SOS Pollinators (Quercus). We also have the "Serra do Açor Forest" project – which brings together the Jerónimo Martins Group, the Municipality of Arganil, the associations that bring together the owners of vacant land and the Agrarian School of Coimbra – it is an initiative launched in 2020 that wants to preserve and enhance the landscape devastated by forest fires, covering an area of 2.500 hectares. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", point "Support for biodiversity protection and ecosystem regeneration projects", of this chapter.	UNGC 8 SDG 6, 14 e 15
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", point "Sustainable fishing strategy", of this chapter	UNGC 8 SDG 6, 14 e 15
EMISSIONS			
305-1	Direct (Scope 1) GHG emissions.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Carbon footprint", of this chapter.	UNGC 7 e 8 SDG 3, 12, 13, 14 e 15
305-2	Energy indirect (Scope 2) GHG emissions.		UNGC 7 e 8 SDG 3, 12, 13, 14 e 15
305-3	Other indirect (Scope 3) GHG emissions.		UNGC 7 e 8 SDG 3, 12, 13, 14 e 15
305-4	GHG emissions intensity.		UNGC 8 SDG 13, 14 e 15
305-5	Reduction of GHG emissions.		UNGC 8 e 9 SDG 13, 14 e 15
305-6	Emissions of ozone depleting substances (ODS).	This aspect was not considered material. Nonetheless, in 2024 it was not verified CFC-11 eq. emissions.	UNGC 7 e 8 SDG 3 e 12
305-7	Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions.	The quantities are emitted by the combustion of fossil fuels (use of on-site fuel for equipment operation, emergency generators and heating, as well as light vehicle fleet): • NOX = 121.2 tonnes (-42.3% compared to 2023); • SOX = 22.3 tonnes (-47.5% compared to 2023).	UNGC 7 e 8 SDG 3, 12, 14 e 15
WASTE			
306-1 (2020)	Waste generation and significant	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Managing circular economy-related risks and opportunities", of this chapter.	UNGC 8 SDG 3, 6 e 11, 12

GRI Standard	Description	Evidence	Other Standards
	waste-related impacts.		UNGC 8 SDG 3, 6, 11, 12, 14 e 15
306-2 (2020)	Management of significant waste-related impacts.	✓	
306-3 (2020)	Waste generated.	✓	
306-4 (2020)	Waste diverted from disposal.	✓	
306-5 (2020)	Waste directed to disposal.	✓	
SUPPLIER ENVIRONMENTAL ASSESSMENT			
308-1	New suppliers that were screened using environmental criteria.	✓	UNGC 8
308-2	Negative environmental impacts in the supply chain and actions taken.		UNGC 8
EMPREGO			
401-1	New employee hires and employee turnover.	✓	UNGC 6 SDG 5, 8 e 10 ESRS 2 GOV-1 ESRS S1-6
		<p>The turnover rate decreased compared to previous years, by 1.6 p.p. globally (30.3% in 2023), 3.9 p.p. in Portugal and 1.2 p.p. in Poland, and also stabilized in Colombia (+0.5 p.p.). Our analysis falls on two types of turnover, non-voluntary and voluntary (from the employee's point of view). The first is essentially the result of the seasonality to which the business is subject, forcing companies to adjust their workforce at times such as Christmas, Easter or summer, as well as a desirable adjustment related to underperformance. On the other hand, there are several reasons that may lead employees to leave our Group voluntarily and that may be related to the opportunity for a new position or the need to change for professional or personal reasons. Voluntary terminations are the main responsible for the turnover rate, especially in the group of employees aged under 30. To understand the reasons for turnover and act preventively, mitigating them, we conducted exit interviews. In addition, this indicator is monitored by the Risk Committee.</p> <p>See the tables below and the subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Our employees", of this chapter.</p>	

New employee hires

	New employee hires					
	Age			Gender		Total
	<30	30-50	>50	Women	Men	
Group	24,208	19,612	1,847	31,594	14,073	45,667
Portugal	7,177	4,032	510	6,511	5,208	11,719
Poland	10,768	11,944	1,317	19,722	4,307	24,029
Colombia	6,194	3,518	7	5,226	4,493	9,719
Slovakia	40	99	7	81	65	146
Czechia	29	19	6	54	0	54

	Rate of new employee hires*					
	Age			Gender		Total
	<30	30-50	>50	Women	Men	
Group	66.2%	22.7%	10.9%	29.7%	42.0%	32.7%
Portugal	75.1%	21.0%	7.6%	28.6%	41.0%	33.1%
Poland	55.8%	20.3%	12.8%	26.2%	33.0%	27.2%
Colombia	81.1%	42.7%	15.9%	63.6%	58.3%	61.1%
Slovakia	87.0%	80.5%	77.8%	77.9%	87.8%	82.0%
Czechia	116.0%	100.0%	150.0%	114.9%	0.0%	112.5%



* Rate of new employee hires (per segment) = total number of new employee hires during the year/total number of employees at the end of the period.

Employee turnover

	Termination of labour contracts					
	Age			Gender		Total
	<30	30-50	>50	Women	Men	
Group	19,676	18,133	2,327	27,279	12,857	40,136
Portugal	7,028	4,158	849	6,716	5,319	12,035
Poland	8,292	10,798	1,468	16,791	3,767	20,558
Colombia	4,322	3,169	7	3,729	3,769	7,498
Slovakia	1	2	1	2	2	4
Czechia	33	6	2	41	0	41

	Rate of employee turnover*					
	Age			Gender		Total
	<30	30-50	>50	Women	Men	
Group	53.8%	21.0%	13.7%	25.7%	38.3%	28.7%
Portugal	73.6%	21.7%	12.7%	29.5%	41.9%	34.0%
Poland	42.9%	18.4%	14.3%	22.3%	28.9%	23.3%
Colombia	56.6%	38.5%	15.9%	45.4%	48.9%	47.1%
Slovakia	2.2%	1.6%	11.1%	1.9%	2.7%	2.2%
Czechia	132.0%	31.6%	50.0%	87.2%	0.0%	85.4%

* Rate of employee turnover (per segment) = total number of employees leaving during the year/total number of employees at the end of the period.






GRI Standard	Description	Evidence	Other Standards
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees.	 See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Compensation and benefits", of this chapter.	UNGC 6 SDG 3, 5 e 8
401-3	Parental leave.	 See the table below and subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Work-life balance", of this chapter.	UNGC 6 SDG 5 e 8 ESRS S1-15

	Parental leave		
	Gender		Total
	Women	Men	
Employees entitled to parental leave	106,326	33,532	139,858
Employees who took parental leave	3,829	1,142	4,971
Employees who returned from parental leave	1,985	1,040	3,025
Employees who returned from parental leave and remained in the Group 12 months after return	2,391	778	3,169
Return to work rate *	51.8%	91.1%	60.9%
Rate of employees still on parental leave**	33.6%	8.0%	27.7%
Retention rate ***	83.5%	74.4%	81.0%

* The return-to-work rate is the percentage of employees who returned from parental leave based on employees who took parental leave during the period.

** The rate of employees who are still on parental leave corresponds to the percentage of employees who have not yet returned from leave. based on employees who have taken parental leave in the period.

***The retention rate corresponds to the percentage of employees who returned from parental leave in 2023 and who remain working in the Group 12 months later.

GRI Standard	Description	Evidence	Other Standards
LABOUR/MANAGEMENT RELATIONS			
402-1	Minimum notice periods regarding operational changes.	 The Jerónimo Martins Group follows the notice periods established by law with regard to changes of an operational nature. All collective labour agreements that exist in Portugal have a clause referring to termination (termination at the will of one of the parties) and a review process, with rules that stipulate, as the case may be, deadlines and procedures for each figure. In any case, this issue is covered by the Portuguese Labour Code that regulates these realities.	UNGC 3 SDG 8
OCCUPATIONAL HEALTH AND SAFETY			
403-1 (2018)	Occupational health and safety management system.		SDG 8 ESRS S1-14
403-2 (2018)	Hazard identification, risk assessment, and incident investigation.		ESRS 2 SBM-3
403-3 (2018)	Occupational health services.	 See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Health and safety at work", of this chapter.	SDG 8 ESRS S1-1
403-4 (2018)	Worker participation, consultation and communication on occupational health and		SDG 8 e 16 ESRS S1-2

GRI Standard	Description	Evidence	Other Standards
	safety.		
403-5 (2018)	Worker training on occupational health and safety.	✓	SDG 8
403-6 (2018)	Promotion of worker health.	✓	SDG 3
403-7 (2018)	Prevention and mitigation of occupational health and safety impacts directly linked to commercial relations.	See subchapter 2. "General Disclosures", section 2.6. "Our policies", subchapter 3. "Environmental information", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection 3.3.5 "Minimum Safeguards", and subchapter 5. "Governance information", section 5.2 "Business Conduct", subsection 5.2.1. "Selection and monitoring suppliers", of this chapter.	SDG 8 e 16 ESRS S2-3
403-8 (2018)	Workers covered by an occupational health and safety management system.	<p>The information presented refers to the health and safety management systems implemented in Biedronka (ISO 45001:2018), Terra Alegre (ISO 45001:2019) and central kitchens of Meal Solutions (ISO 45001:2023). In this context, 84,828 employees are considered (84,145 at Biedronka, 149 at Terra Alegre and 534 at Meal Solutions) and 17,223 non-collaborators (17,195 at Biedronka, 16 at Terra Alegre and 12 at Meal Solutions).</p> <p>As a rule, all employees are covered by the system. The external audit only includes a sample of the total number of employees and non-employees, having covered 24.3% of the population in 2024. Employees and non-employees are also covered by the occupational safety and health systems of their respective countries, in accordance with local legislation. See the table below and the subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Health and safety at work" of this chapter.</p>	SDG 8 ESRS S1-14

Health and safety management certified system coverage – Biedronka, Terra Alegre and Meal Solutions' central kitchens		
	Total	%
Employees and workers who are not employees covered by certified the system	102,051	100%
Employees and workers who are not employees covered by the certified system that was audited internally	102,051	100%
Employees and workers who are not employees covered by the certified system that has been audited by an external entity	24,839	24.3%

GRI Standard	Description	Evidence	Other Standards
403-9 (2018)	Work-related injuries.	<p>In 2024, there were 4,300 accidents at work across the Group, and 49 that had a serious consequence. Compared to the previous year, this represents a 12.7% reduction in total accidents, but a 44.1% increase in serious cases. The difference between genders is due to the greater presence of women in the workforce. The rate of recordable work-related injuries, which measures the ratio between the number of accidents and the hours worked, showed an even more significant reduction than the absolute number of accidents (-16.0%). This means that, even with a 4.1% increase in the workforce and a 3.9% increase in hours worked, there were proportionally fewer accidents. The rate of high-consequence work-related injuries grew 38.7%, an increase lower than that observed in the absolute number of this typology.</p> <p>Most accidents:</p> <ul style="list-style-type: none"> in Portugal led to trauma and contusions; in Poland resulted in limb injuries, cuts and musculoskeletal injuries; in Colombia led to contusions, strains and sprains, minor superficial burns and musculoskeletal injuries. <p>Most accidents are related to falls, physical exertion, inappropriate handling of equipment, risky behavior, residue or wet floors and handling of cutting instruments. The main hazards and causes of accidents are mostly determined through the analysis of the accidents that have occurred and, to mitigate them, we continuously implement training and awareness programs, focused on the most common hazards (e.g., handling of equipment and handling of loads in the store/distribution center, for operations and good road practices, for employees of central structures). The identified hazards are also being phased out with the refurbishment and opening of new stores.</p> <p>There was one death of an employee in Portugal, as a result of a work accident that led to head trauma.</p>	SDG 3, 8 e 16 ESRS S1-14

GRI Standard	Description	Evidence	Other Standards
		<p>In 2024, the Group recorded accidents among workers who are not employee in the three main countries, with a total of 219 accidents (24 in Portugal, 104 in Poland and 91 in Colombia), which main causes and associated hazards are similar to those recorded for employees. Two deaths were also recorded, one in Portugal and one in Colombia. We continue to improve our reporting systems to ensure that we report the entirety of the information requested by the indicator.</p> <p>See the tables below and the subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Health and safety at work", of this chapter.</p>	


Work-related injuries – employees			
	Gender		Total
	Women	Men	
Fatalities	0	1	1
High-consequence work-related injuries*	40	9	49
Recordable work-related injuries	3,023	1,277	4,300
Total hours worked	160,749,695	59,081,353	219,831,048
Rate of high-consequence work related injuries**	0.25	0.15	0.22
Rate of recordable work-related injuries***	18.81	21.61	19.56

Work-related injuries – workers who are not employees	
	Total
Fatalities	2
High-consequence work-related injuries*	0
Recordable work-related injuries	219

* High-consequence work-related injuries are considered to be those resulting in an employee absence of more than 180 days.

** Rate of high-consequence work-related injuries (except deaths) = (Number of workplace accidents with serious consequences (except deaths)/Total hours worked) x 10⁵. As for the data reported in the 2023 Annual Report on accidents with serious consequences (34 accidents in the Group), since absences of more than 180 days can only be calculated as of 30 June 2024, these should be corrected. There were further 41 accidents that resulted in employees being absent for more than 180 days (13 in Portugal and 28 in Poland), which extended into 2024. So, in total, there were 75 high-consequence work-related injuries in 2023.

*** Rate of recordable work-related injuries = (Number of workplace accidents that must be reported/Total hours worked) x 10⁵. Following the adoption of the reporting standards (ESRS) introduced by the CSRD, and in order to respond to data requirement S1-14, the accidents considered for the calculation of this indicator are now those resulting in death, days of absence from work, limited work or transfer to another job, medical treatment beyond first aid or loss of consciousness.

GRI Standard	Description	Evidence	Other Standards
403-10 (2018)	Work-related ill health.	<p></p> <p>In 2024, 117 cases of occupational diseases were registered, which corresponds to an increase of 11.4% compared to 2023. The gender difference is due to the greater number of women in the workforce. The main occupational diseases recorded were tendonitis (inflammation of the tendons), epicondylitis (inflammation of the elbow), periarthritis (inflammation of the shoulder), paralysis, carpal tunnel syndrome, low back pain, among other chronic diseases of the musculoskeletal system.</p> <p>The main causes of occupational diseases are repeated movements and overloads on tendon sheaths, combined with a high pace of work with varied and manual loads. To mitigate these dangers, the Companies have improved the machinery and equipment park, changed and ensured the maintenance of workplace infrastructures, reinforced awareness and specific OHS training in identifying hazards and risks related to the activities carried out in the workplace, as well as evolving in the organization of tasks and in the adjustment of working hours.</p> <p>In 2024, the Group counted cases of occupational diseases among workers who are not employees in Portugal and Colombia, in a total of 7 cases (1 in Portugal and 6 in Colombia), which main causes and associated dangers are similar to those recorded for employees. In Poland, the existing systems do not allow for the quantification of cases of illness among workers who are not employees. The indicator reported in 2023 for this country (45 cases in Portugal and Poland) should be equal to 5, with all cases confirmed in Portugal and none in Poland. We continue to improve our reporting systems to ensure that we report the entirety of the information requested by the indicator.</p> <p>See the tables below and subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Health and safety at work" of this chapter.</p>	SDG 3, 8 e 16

	Work-related ill health		
	Gender		Total
	Women	Men	
Fatalities	0	0	0
Recordable work-related ill health	110	7	117

	Work-related ill health – workers who are not employees	
	Total	
Fatalities	0	
Recordable work-related ill health	7	

GRI Standard	Description	Evidence	Other Standards
TRAINING AND EDUCATION			

404-1	Average hours of training per year per employee.	✓	<p>The average hours of training for men is slightly higher than for women because some roles at the operational functional level, such as the butcher or logistics section, have due to their specificity the need for a greater number of hours of training and are currently occupied by more men. The operational functional level is also the one with the highest number of hours of training, which is partly justified by being the category with the highest turnover, requiring a greater need for training during onboarding and also in mandatory topics such as health and safety at work.</p> <p>See the table below and subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Training and skills development", subpoint "Training" of this chapter.</p>	<p>UNGC 6 SDG 4, 5, 8 e 10 ESRS S1-13</p>
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	Average hours of training		
	Gender		Total
	Women	Men	
Group	63	68	64
Strategic	33	14	20
Managerial	34	35	35
Operational	63	70	65

GRI Standard	Description	Evidence	Other Standards
404-2	Programs for upgrading employee skills and transition assistance programs.	✓	<p>See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Training and skills development", of this chapter.</p> <p>SDG 8</p>
404-3	Percentage of employees receiving regular performance and career development reviews.	✓	<p>See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Training and skills development", subpoint "Leadership development", of this chapter.</p> <p>Only employees eligible for performance evaluation were considered, in accordance with the Performance Evaluation Policies in force at the Corporate level and in each of the Companies. In 2024, in Colombia, employees at the operational functional level were not considered eligible for this analysis, due to the non-application of the process.</p> <p>UNGC 6 SDG 5, 8 e 10 ESRS S1-13</p>


DIVERSITY AND EQUAL OPPORTUNITY

405-1	Diversity of governance bodies and employees.	✓	<p>See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", points "Our employees" and "Diversity and inclusion", of this chapter.</p> <p>Additionally, refer to chapter 1 "The Jerónimo Martins Group", subchapter 1. "Profile and Structure", section 1.3. "Statutory Bodies and Structure", subsection 1.3.1. "Statutory Bodies", and chapter 4 "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section B "Corporate Bodies and Committees", subsection II "Management and Supervision (Board of Directors)", 17. "Composition of the Board of Directors, With Details of the Articles of Association's Minimum and Maximum Number of Members, Duration of Term of Office, Number of Effective Members, Date When First Appointed and End of the Term of Office of Each Member".</p> <p>UNGC 6 SDG 5 e 8 ESRS S1-9</p>
405-2	Ratio of basic salary and remuneration of women to men.	✓	<p>See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", points "Our employees" and "Diversity and inclusion", of this chapter.</p> <p>UNGC 6 SDG 5, 8 e 10 ESRS S1-16</p>

NON-DISCRIMINATION











406-1	Incidents of discrimination and corrective actions taken	✓	<p>See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", points "Our employees" and "Ethics and compliance" of this chapter.</p> <p>UNGC 6 SDG 5 e 8 ESRS S1-17</p>
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GRI Standard	Description	Evidence	Other Standards
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.	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", points "Our employees" and "Ethics and compliance", and subsection 4.2.4. "Workers in the value chain", points "Responsible labour management in the value chain" and "Sustainability certification", of this chapter.	UNGC 3 SDG 8
CHILD LABOUR			
408-1	Operations and suppliers at significant risk for incidents of child labour.	See subchapter 4. "Social Information", section 4.2. "Managing Social Topics", subsection 4.2.1. "Own workforce", points "Our employees" and "Ethics and compliance", and subsection 4.2.4. "Workers in the value chain", point "Responsible labour management in the value chain" and point "Sustainability certification" of this chapter.	UNGC 5 SDG 8 e 16
FORCED OR COMPULSORY LABOUR			
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour.	See subchapter 4. "Social Information", section 4.2. "Managing Social Topics", subsection 4.2.1. "Own workforce", points "Our employees", and "Ethics and compliance", and subsection 4.2.4. "Workers in the value chain", points "Responsible labour management in the value chain" and "Sustainability certification" of this chapter.	UNGC 4 SDG 8
SEGURANÇA			
410-1	Security personnel trained in human rights policies or procedures.	We continue to improve our systems to ensure that we report the information requested by the indicator.	UNGC 1 SDG 16
SECURITY PRACTICES			
413-1	Operations with local community engagement, impact assessments, and development programs.	See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.2. "Affected communities", point "How we dialogue with affected communities" of this chapter.	UNGC 1 SDG 1 e 2
SUPPLIER SOCIAL ASSESSMENT			
414-1	New suppliers that were screened using social criteria.	See subchapter 5. "Governance information", section 5.2. "Business Conduct", subsection 5.2.1. "Selection and monitoring suppliers", of this chapter.	UNGC 2 SDG 5, 8 e 16
414-2	Negative social impacts in the supply chain and actions taken.	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.4. "Workers in the value chain", points "Responsible labour management in the value chain" and "Sustainability certification", of this chapter.	UNGC 2 SDG 5, 8 e 16
PUBLIC POLICY			
415-1	Political contributions.	The companies of the Jerónimo Martins Group do not support political parties or their representatives, nor do they financially contribute to groups that may support partisan interests. See the 'Responsibility' channel, 'Corporate Responsibility Publications' page to consult the Code of Conduct on the website www.jeronimomartins.com .	UNGC 10 SDG 16
CUSTOMER HEALTH AND SAFETY			
416-1	Assessment of the health and safety impacts of product and service categories.	See subchapter 5. "Governance information", section 5.2. "Business Conduct", subsection 5.2.1. "Selection and monitoring suppliers", of this chapter.	---
416-2	Incidents of noncompliance concerning the health and safety impacts of products and services.	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Actions towards our consumers", subpoint "Product quality and safety", sub-subpoint "Food recalls and withdrawals", of this chapter. Information on contingent liabilities considered to be material is described in note 23. "Contingencies, contingent assets and contingent liabilities" in Chapter 3. "Financial Statements".	SDG 16 SDG 16
MARKETING AND LABELING			
417-1	Requirements for product and service information and labelling.	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Actions towards our consumers", subpoint "Product innovation", sub-subpoint "Certified ingredients, products and packaging".	SDG 12
417-2	Incidents of noncompliance concerning product and service	Information on contingent liabilities considered to be material is described in note 23. "Contingencies, contingent assets and contingent liabilities" in Chapter 3. "Financial Statements".	SDG 16

GRI Standard	Description	Evidence	Other Standards
	information and labelling.		
417-3	Incidents of noncompliance concerning marketing communications.	 <p>Information on contingent liabilities considered to be material is described in note 23. "Contingencies, contingent assets and contingent liabilities" in Chapter 3. "Financial Statements".</p>	SDG 16

The table of indicators above follows the methodology of the Global Reporting Initiative (GRI) Standards. Unless otherwise Stated, indicators are reported in accordance with the 2021 version of the GRI Standards.

7.3. SASB – Sustainability Accounting Standards Board

SASB Indicator	Description	Evidence	Other Standards
FB-FR-110a.1	Fleet fuel consumed. percentage renewable.	 <p>See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", of this chapter.</p>	UNGC 7 and 8 GRI 302-1 GRI 302-2 SDG 7, 8, 12 and 13
FB-FR-110b.1	Gross global scope 1 emissions from refrigerants.	 <p>See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Carbon Footprint", of this chapter.</p>	UNGC 7 and 8 GRI 305-1 SDG 3, 12, 13, 14 and 15
FB-FR-110b.2	Percentage of refrigerants consumed with zero ozone depleting potential.	 <p>In 2024, there was no emissions of CFC-11 eq..</p>	UNGC 7 and 8 GRI 305-6 SDG 3 and 12
FB-FR-130a.1	1) Energy consumed. (2) percentage grid electricity. (3) percentage renewable.	 <p>See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Energy consumption management", of this chapter.</p>	UNGC 7, 8 and 9 GRI 302-1 GRI 302-2 SDG 7, 8, 12 and 13
FB-FR-150a.1	Amount of food waste generated, percentage diverted from the waste stream.	 <p>See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Actions to promote a circular economy", subpoint "Fighting food waste", of this chapter. See also subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.</p>	SDG 2, 12 and 13
FB-FR-230a.2	Description of approach to identifying and addressing data security risks.	 <p>Refer to chapter 4 "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section B "Corporate Bodies and Committees", subsection II "Management and Supervision (Board of Directors)", 21. "Organisational Charts Concerning the Allocation of Powers Between the Various Corporate Boards, Committees and/or Departments Within the Company, including Information on Delegating Powers, particularly as Regards the Delegation of the Company's Daily Management", section C "Internal Organisation", subsection III "Internal Control and Risk Management", 53. "Details and Description of the Major Economic, Financial and Legal Risks to which the Company is Exposed in Pursuing Its Business Activity".</p>	---
FB-FR-250a.2	Number of recalls. Number of units recalled and percentage of units recalled that are Private Brand products.	 <p>See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Actions towards our consumers", subpoint "Product quality and safety", of this chapter.</p>	SDG 3 and 12 GRI 416-2
FB-FR-260a.2	Description of the process to identify and manage products and ingredients related to nutritional and health concerns among consumers.	 <p>See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Actions towards our consumers", subpoint "Product quality and safety", of this chapter.</p>	SDG 3 and 12 GRI 416-1
FB-FR-310a.2	Percentage of active workforce covered under collective bargaining agreements.	 <p>See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Ethics and compliance", of this chapter.</p>	UNGC 3 GRI 2-30 SDG 8 ESRS S1-8
FB-FR-430a.1	Revenue from products third-party certified to environmental or social sustainability sourcing standards.	 <p>See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.</p>	SDG 12

SASB Indicator	Description	Evidence	Other Standards
FB-FR-430a.2	Percentage of revenue from eggs originated from a cage-free environment.	✓	SDG 12 and 15
	Percentage of revenue from pork produced without the use of gestation crates.	Not applicable.	
FB-FR-430a.3	Description of strategy to manage environmental and social risks within the supply chain, including animal welfare.	✓	UNGC 7 GRI 3-3 SDG 12 and 15
FB-FR-430a.4	Discussion of strategies to reduce the environmental impact of packaging.	✓	UNGC 7 and 8 GRI 3-3 UNGC 7 and 8 GRI 3-3 GRI 301-1 SDG 8 and 12
FB-FR-000.A	Number of (1) retail locations and (2) distribution centers.	✓	---
FB-FR-000.B	Total area of (1) retail space and (2) distribution centers.	✓	---
FB-FR-000.C	Number of vehicles in commercial fleet.	✓	---

7.4. IFRS-S – International Financial Reporting Standards - Sustainability Series

IFRS S1 - General Requirements for Disclosure of Sustainability-related Financial Information

IFRS S1	Evidence	Other standards
GOVERNANCE	✓ For more information see subchapter 2. "General disclosures", section 2.2. "Governance and strategy", section 2.4 "Managing sustainability reporting risks", of this chapter.	ESRS 2 GOV 1; ESRS 2 GOV 2; ESRS 2 GOV 3; ESRS 2 GOV 4
STRATEGY	✓ For more: Code of Conduct. see also subchapter 2. "General disclosures", section 2.5. "Impacts, risks and opportunities and double materiality assessment", subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", point "Managing climate-related risks and opportunities", subpoints "Managing climate-related risks and opportunities", and "Identifying risks and opportunities", and point "Our climate transition plan", subsection 3.2.4. "Biodiversity and ecosystems", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subsection "3.3.5. Minimum safeguards", of this chapter. See also our Climate Transition Plan . See also subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", subsection 4.2.2. "Affected communities", subsection 4.2.3. "Consumers and end users", subsection 4.2.4 "Workers in the value chain".	ESRS 2 SBM-1; ESRS 2 SBM-2; ESRS 2 SBM-3
RISK MANAGEMENT	✓ For more information see subchapter 2. "General disclosures", section 2.2. "Governance and strategy", sections 2.4 "Managing sustainability reporting risks", 2.5 "Impacts, risks and opportunities and double materiality assessment", subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", point "Managing climate-related risks and opportunities", subpoint "Identifying risks and opportunities", and section 3.2.2. "Resource use and circular economy", point "Managing circular economy-related risks and opportunities", and subsection 3.2.3 "Water and marine resources", subsection 3.2.4. "Biodiversity and ecosystems", 3.2.5. "Pollution", subsection 5. "Governance information", section 5.2. "Business Conduct", of this chapter. The risk management mechanisms are described in chapter 4. "Corporate Governance", Part I – "Information on Shareholder Structure, Organisation and Corporate Governance", section C "Internal Organisation", subsection III – "Internal Control and Risk Management", 53. "Identification and Description of the Main Types of Risks (Economic, Financial and Legal) to which the Company is Exposed in the Course of Business".	ESRS 2 GOV-5 ESRS 2 IRO-1; ESRS 2 IRO-2
METRICS AND TARGETS	✓ For more information see subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", subsection 3.2.2. "Resource use and circular economy", subsection 3.2.3 "Water and marine resources", 3.2.4. "Biodiversity and ecosystems", 3.2.5. "Pollution", subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", subchapter 5. "Governance information", section 5.2. "Business Conduct", subsection 5.2.4 "Supplier payment practices and initiatives", and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	ESRS 2 MDR-M; ESRS 2 MDR-T; ESRS E1-4 a ESRS E1-9; ESRS E2-3 a ESRS E2-6; ESRS E3-3 a ESRS E3-5; ESRS E4-4 a ESRS E4-6; ESRS E5-3 a ESRS E5-5; ESRS S1-5 a S1-17; ESRS S2-5; ESRS S3-5; ESRS S4-5; ESRS G1-6.

IFRS S1	Evidence	Other standards
MATERIALITY	✓ For more information see subchapter 2. "General disclosures", 2.5 "Impacts, risks and opportunities and double materiality assessment", of this chapter.	ESRS 2 SBM-2; ESRS 2 SBM-3; ESRS 2 IRO-1; ESRS 2 IRO-2

IFRS S2 - Climate-related Disclosures

IFRS S2	Evidence	Other standards
GOVERNANCE	✓ For more information see subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", point "Managing climate-related risks and opportunities", subpoint "Governance", of this chapter.	ESRS 2 SBM-3; ESRS 2 GOV-3; ESRS E1-1; E1-2
STRATEGY	✓ For more information see subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", point "Managing climate-related risks and opportunities", subpoint "Our strategy" and "Identifying risks and opportunities", and points "Our climate transition plan", "Carbon footprint" and "Our actions to reduce carbon emissions", of this chapter. See also our Climate Transition Plan, available in our website .	ESRS 2 SBM-3; ESRS 2 MDR-A; ESRS E1-1; ESRS E1-2; ESRS E1-3; ESRS 2 IRO-1
RISK MANAGEMENT	✓ For more information see subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate Change", point "Managing climate-related risks and opportunities", subpoints "Our strategy" and "Identifying risks and opportunities", and points "Carbon footprint" and "Our actions to reduce carbon emissions", of this chapter. See also our Climate Transition Plan, available in our website .	ESRS E1-2; ESRS E1-3; ESRS 2 IRO-1
METRICS AND TARGETS	✓ For more information see subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", section 3.3. "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)", subchapter 6. "Sustainability commitments" and subchapter 7. "Reporting frameworks", section 7.3. "SASB – Sustainability Accounting Standards Board", of this chapter. See also our Climate Transition Plan, available in our website .	ESRS E1-4 to ESRS E1-9

7.5. Jerónimo Martins Performance Indicators

Description	Evidence	Other standards
ENVIRONMENT		
Number of locations with environmental certification for at least 70% of all distribution centres and industrial units (fresh pasta factory, central kitchens, soup factory, Terra Alegre dairy factory and packaging units), by 2026.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.5 "Pollution" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	UNGC 8 SDG 7, 12 and 13
Reduce energy consumption by 10% (in GJ per 1.000€ of sales) by 2026, compared to 2021.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Energy consumption management", and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	UNGC 7 SDG 7, 12 and 13
Reduce water withdrawal in Distribution activities by 10% (per 1.000€ of sales), by 2026, compared to 2021.	✓ See subchapter 3. "Environmental information", section 3.2 "Managing environmental topics", subsection 3.2.3 "Water and marine resources", point "Water consumption", and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026" of this chapter.	UNGC 7 SDG 7, 12, 13 and 14
Reduce carbon emissions resulting from transporting goods to stores by 5% (in tonnes of CO ₂ e per pallet transported) by 2026, compared to 2021.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Carbon footprint", and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026" of this chapter.	UNGC 7 SDG 7, 12 and 13
Ensure an annual waste recovery rate of at least 85% of the volume of waste generated by 2026.	✓ Of the energy consumed by Jerónimo Martins Companies operations, 46% comes from non-renewable sources. See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Energy consumption management", and subchapter 6. "Sustainability commitments", section 6.2. "Commitments 2024-2026" of this chapter.	UNGC 7, 8 and 9 SDG 7, 8, 12 and 13
Reduce the Group's scopes 1 and 2 emissions, in absolute terms, by at least 10% by 2026, compared to 2021. This commitment is aligned with the science-based target for the near-term submitted by Jerónimo Martins to the Science Based Targets Initiative.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	UNGC 7 SDG 7, 12 and 13
Reach 60% renewable electricity consumption by 2030.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Carbon footprint", and subchapter 6.	UNGC 7 SDG 7, 12 and 13

Description	Evidence	Other standards
	"Sustainability commitments", section 6.2. "Long-term commitments", of this chapter.	
Reduce absolute GHG emissions (scopes 1 and 2) in 55% by 2033, compared to 2021. Target validated by the Science Based Targets Initiative.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.1. "Climate change", point "Carbon footprint", and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	UNGC 7 SDG 7, 12 and 13
Reduce absolute energy and industry scope 3 emissions in 33% by 2033, compared to 2021. Target validated by the Science Based Targets Initiative.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental issues", subsection 3.2.1. "Climate change", point "Carbon footprint", and subchapter 6. "Sustainability commitments", section 6.2 "Long-term commitments", of this chapter.	UNGC 7 SDG 7, 12 and 13
Reduce absolute Forest, Land and Agriculture emissions (scopes 1 and 3) in 39% by 2033, compared to 2021.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental issues", subsection 3.2.1. "Climate change", point "Carbon footprint", and subchapter 6. "Sustainability commitments", section 6.2 "Long-term commitments", of this chapter.	UNGC 7 SDG 7, 12 and 13
Engage, in the period 2024-2026, with at least 5 of the top 100 suppliers in terms of purchased goods in each company, to collaborate on the definition of strategies for the reduction of scope 3 emissions.	See subchapter 3. "Environmental information", section 3.2 "Managing environmental topics", subsection 3.2.1 "Climate change", point "Managing climate-related risks and opportunities", sub-point "Collaboration with suppliers" of this chapter. See chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	UNGC 7 SDG 7, 12 and 13
Percentage of establishment that use low Global Warming Potential (GWP) gases or natural refrigerants in our refrigeration systems.	See subchapter 3. "Environmental information". section 3.2 "Managing environmental topics". subsection 3.2.1 "Climate change", point "Our actions to reduce carbon emissions", sub-point "Management of refrigerant gases" of this chapter.	UNGC 7 SDG 7, 12 and 13
Define and implement a mitigation and adaptation plan to improve the efficiency of water use and to manage its scarcity during low precipitation periods in JMA units, publicly disclosing its progress.	See subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	UNGC 7 SDG 7, 12, 13 and 14
In Colombia, Poland and Portugal support and/or implement, in the period 2024-2026, at least two nature conservation and biodiversity protection projects, aligned with the Kunming-Montreal Global Diversity Framework, and disclose its results annually.	See subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	UNGC 8 SDG 14, 15 and 17
Calculation of avoided materials and other environmental benefits of packaging eco-design.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Materials used and resource outflows" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12 and 13
Ensure that at least 25% of Private Brand products' packaging is included in the Ecodesign project by 2026. considering the 2023 assortment.		SDG 12 and 13
Calculation of the amount of plastic in Private Brand packaging and other single-use plastics.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Materials used and resource outflows" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12 and 13
Incorporate at least 25% of recycled plastic in packaging under our responsibility (private brand, service packaging, shopping bags, and pallet wrapping film) by 2025.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Materials consumed and resource outflows", and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12 and 13
Reduce specific plastic consumption by 10% (measured in tonnes of plastic packaging for every million euros in sales) by 2025, compared to 2018.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Materials consumed and resource outflows" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12 and 13
Reduce by 15% the use of virgin plastic in Private Brand packaging, service packs, wrapping film and check-out bags compared to 2018.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Materials consumed and resource outflows" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12 and 13
Eliminate problematic components (e.g. PVC, EPS and XPS) from Private Brand plastic packaging by 2025.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Materials consumed and resource outflows" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12 and 13
Percentage of Private Brand plastic packaging that is 100% reusable or recyclable.	See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Materials consumed and	SDG 12 and 13

Description	Evidence	Other standards
	resource outflows" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	
Ensure an annual waste recovery rate of at least 85% of the volume of waste generated by 2026.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Materials consumed and resource outflows" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12 and 13
Food waste generated in the Group's operations (kg/t of product sold).	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Managing circular economy-related risks and opportunities", sub-point "Fighting food waste" and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	UNGC 7 SDG 2, 12 and 13
Limit annual food waste to 2.5% of total food sales (in tonnes), in 2024-2026 period.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", subpoint "Fighting food waste" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 2, 12 and 13
Increase by 10% the amount of rescued food in own operations and in the supply-chain, namely through food donations, sales with a discount price of food products reaching the expiry date, recovery of non-graded food from farmers and leftovers from own operations and recovery of wasted food to animal feed and bio processing, by 2026, compared to 2023.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.2. "Resource use and circular economy", point "Actions to promote a circular economy", subpoint "Fighting food waste" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 2, 12 and 13
Increase sales of Private Brand and/or perishable products and packaging with sustainability certification to at least 15% of the total sales of these product categories by 2026.	✓ See subchapter 4. "Social Information", section 4.2 "Managing social topics", subsection 4.2.3 "Consumers and end-users", point "Actions towards our consumers", and sub-point "Product innovation", and sub-sub-point "Certified ingredients, products and packaging", of this chapter.	UNGC 8 SDG 12 and 13
Carry out at least 40 environmental audits every year on service providers.	✓ See subchapter 5. "Governance information", section 5.2. "Business conduct", subsection 5.2.1. "Selection and monitoring of suppliers", point "Environmental audits" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	UNGC 8 SDG 12, 13 and 15
Calculation of consumption of deforestation commodities (palm oil, soy, paper and wood, and beef) in Private Brand and perishable products.	✓	UNGC 7, 8 and 9 SDG 12, 13 and 15
By 2025, ensure that palm oil, soy, paper and wood and beef in our Private Brand and perishable products are not associated with either deforestation or conversion of ecosystems (DCF - Deforestation and Conversion Free).	✓	
Continue to ensure that 100 % of palm oil in Portugal and Poland is RSPO certified and progressively extend this commitment to palm oil derivatives. In Colombia, ensure compliance with the Colombian government's "Acuerdo de Voluntades para la Deforestación Cero en la Cadena de Palma en Colombia" (Voluntary Agreement for Zero Deforestation in the Colombian Palm Oil Chain), guaranteeing that by 2026, the palm oil of Colombian origin used in Private Brands and perishable products is traceable to the farm where it was produced and is not associated with deforestation, and that 100% of palm oil of non-Colombian origin used in Private Brands and perishable products is certified by the RSPO.	✓	
By 2025, ensure that 100% of direct and indirect soy is traceable at least to the country of origin and that whenever it comes from an origin where the risk is not negligible, the soy is traced back to the municipality of origin and/or has sustainability certification (e.g. RTRS or Proterra).	✓	
Working with suppliers of Private Brand products and perishables to ensure that 95% of the virgin fibres used in our products and 80% of the virgin fibres used in our packaging are certified (FSC® or PEFC) by 2026.	✓	
Ensure that 100% of the beef in our Private Brand and perishable products is traceable at least to the country of origin. and that traceability to the farm of origin is guaranteed for all beef sourced from non-negligible risk countries.	✓	

Description	Evidence	Other standards
Percentage of cage-free Private Brand fresh eggs.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", point "Animal welfare", of this chapter.	SDG 12
Percentage of eggs used as ingredients in Private Brand products from cage-free.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", point "Animal welfare", of this chapter.	SDG 12
Ensure compliance with the Group's Sustainable Fishing Strategy.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", point "Sustainability fishing strategy", of this chapter.	SDG 12 and 14
By 2026, analyse the sustainability status of fish stocks for at least 80% of fish sales (in kg), from Private Brand and perishable products, and publicly disclose progress.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", point "Sustainability fishing strategy", of this chapter.	SDG 12 and 14
By 2026, ensure that 100% of wild-caught tuna in our Private Brand and perishable products is traceable to the vessel.	✓ See subchapter 3. "Environmental information", section 3.2. "Managing environmental topics", subsection 3.2.4. "Biodiversity and ecosystems", point "Sustainability fishing strategy", of this chapter.	SDG 12 and 14
Ensure the annual application of the Sustainable Agriculture Manual in at least 60 new farms in Portugal, in the 2024-2026 period.	✓ See subchapter 5. "Governance information", section 5.2. "Business conduct", subsection 5.2.2. "Supplier awareness and training", of this chapter.	UNGC 7, 8 and 9 SDG 12, 13, 14 and 15
SOCIAL		
Number of Nutri-Score references, versus the total number of food product launches, in Portugal and Poland.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end users", point "Relations with consumers", sub-point "Providing information to consumers", sub-sub-point "Product information" and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
Number of Private Brand products/references as vegan, plant-based, low in carbohydrates, fat and salt, low/sugar-free, lactose-free, gluten-free and/or for consumers over 50 in Portugal, Poland and Colombia, compared to the previous year.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end users", point "Relations with consumers", sub-point "Providing information to consumers", sub-sub-point "Product information" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3, 10 and 12
In Colombia, ensure that 100% of Private Brand products do not contain artificial colours or flavours enhancers in their direct ingredients by 2026.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end users", point "Relation with consumers", subpoint "Providing information to consumers", sub-subpoint "Product information" and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In all countries, ensure that products targeted for children have higher, or at least equal, nutritional profile than the benchmark (or best in class) according to the country of operation.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end users", point "Actions aimed at our consumers", sub-point "Product innovation", sub-subpoint "Reformulations" and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter	SDG 2, 3, 10 and 12
In Portugal ensure the use of voluntary "Without GMO" labelling for at least 75% of Private Brand food references containing mostly (>50%/net weight) potentially modified ingredients (soy and corn), helping consumers in the decision-making process.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3 "Consumers and end users", point "Engaging with consumers", sub-point "Product quality and safety", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Portugal, facilitate responsible consumption through voluntary labelling of alcoholic beverages (including wines) for 100% of Private Brand references. in the following areas: i) calorie intake; ii) not recommended for pregnant women; iii) promotion of responsible driving.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end users", point "Engaging with consumers", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Hebe, reinforce the relevance of Private Brand alternatives without ingredients of animal origin, in particular by launching at least 10 new references a year.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end users", point "Actions aimed at our consumers", sub-point "Product innovation", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Hebe, reinforce the relevance of "Hebe Naturals" product range, which contain at least 92% natural ingredients in their formula (according to ISO 16128).	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end users", point "Actions aimed at our consumers", sub-point "Product innovation", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Portugal, Poland and Colombia carry out at least one annual programme to promote the principles of the Mediterranean diet, in Portugal, or healthy eating habits in geographies with other diets (based on the recommendations of local experts).	✓ See subchapter 4. "Social information", section 4.2 "Managing social topics", subsection 4.2.3 "Consumers and end users", point "Engaging with consumers", sub-point "Consumer information providers", sub-subpoint "Information in other media", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3, 10 and 12

Description	Evidence	Other standards
In all countries, promote literacy for product labelling.	✓ See subchapter 4. "Social information", section 4.2 "Managing social topics", subsection 4.2.3 "Consumers and end users", point "Engaging with consumers", sub-point "Consumer information providers", sub-subpoint "Product information", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Portugal, ensure the Nutri-Score labelling is applied on 100% of Private Brand food launches.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Engaging with consumers", sub-point "Providing information to consumers", sub-subpoint "Product information", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Poland, ensure the Nutri-Score labelling is applied on 100% of Private Brand food launches in selected categories.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end-users", point "Engaging with consumers", sub-point "Providing information to consumers", sub-subpoint "Product information", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Colombia, ensure that 100% of Private Brand products do not contain, in their direct ingredients, artificial colorants or flavour enhancers until 2026.	✓ See subchapter 4. "Social information", section 4.2 "Managing social topics", subsection 4.2.3 "Consumers and end users", point "Actions towards our consumers", sub-point "Product innovation", sub-subpoints "Launches" and "Reformulations", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Poland, guarantee the absence of glucose-fructose syrup in at least 90% of Private Brand products by the end of 2026.	✓ In Poland, 168 products were considered eligible. Of these, 146 were included in the removal of glucose-fructose syrup, corresponding to 87 per cent of Private Brand products (+3 p.p. vs. 2023).	SDG 3 and 12
In Poland, remove soy lecithin in at least 50% of Private Brand products with that ingredient until the end of 2026.	✓ See subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Poland and in Portugal, ensure whenever possible, by the end of 2026, that wholegrains are the main ingredient in breakfast cereals (with the exception of corn-based cereals).	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end users", point "Actions aimed at our consumers", sub-point "Product innovation", sub-subpoint "Reformulations", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Portugal, guarantee the enrichment of essential minerals and vitamins in the best-selling Private Brand products that aim to complement the main sources of food until the end of 2026.	✓ See subchapter 4. "Social information", section 4.2 "Managing social topics", subsection 4.2.3 "Consumers and end users", point "Actions aimed at our consumers", sub-point "Product innovation", sub-subpoint "Reformulations", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
Ensure that, by 2026, 100% of our Private Brand food portfolio does not contain acesulfame and develop alternatives, together with suppliers, to replace aspartame for natural sweeteners.	✓ See subchapter 4. "Social information", section 4.2 "Managing social topics", subsection 4.2.3 "Consumers and end users", point "Actions aimed at our consumers", sub-point "Product innovation", sub-subpoint "Reformulations", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Portugal and Poland, reinforce the relevance of the offer of Private Brand cosmetic products without ingredients of animal origin for consumers with specific preferences.	✓ See subchapter 4. "Social information", section 4.2 "Managing social topics", subsection 4.2.3 "Consumers and end users", point "Actions towards our consumers", sub-point "Product innovation", sub-subpoints "Launches" and "Reformulations", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Biedronka, ensure that at least 95% of the Private Brand regular assortment of personal hygiene products is microplastic-free.	✓ See subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Portugal and Poland, reinforce the relevance of the offer of Private Brand cosmetic products containing at least 90% of natural ingredients in their composition (in line with ISO 16128).	✓ See subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Biedronka develop Private Brand detergents that have. Simultaneously, natural fragrances in their ingredients, are preservatives-free and are Ecolabel certified.	✓ See subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Biedronka, introduce the 'Eat fish twice a week' labelling for 100% of fresh fish references in selected processed Private Brand references and specialized perishables by 2026.	✓ See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end users", point "Relations with consumers", sub-point "Providing information to consumers", sub-subpoint "Product information", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12
Seek to ensure, on an annual basis, that the number of recalls of food products with potential risk to public health (level I severity), the cause of which is attributable to the Jerónimo Martins Companies, is zero. In the event of the occurrence of cases of level I	✓ See subchapter 4. "Social information", section 4.2 "Managing social topics", subsection 4.2.3 "Consumers and end users", point "Actions aimed at our consumers" and subpoint "Product quality and safety", sub-subpoint "Food product recalls", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter,	SDG 3 and 12

Description		Evidence	Other standards
severity, and in line with Jerónimo Martins' Product Quality and Safety Policy, ensure by all available means that the collection of food products in stores and Distribution Centres is 100% effective.			
In Poland, maintaining the number of ISO 22000-certified locations (17 distribution centers in 2024) and ensuring that the new Distribution Centres to be opened in the 2024-2026 period are certified within two years of starting operations.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.3 "Consumers and end users", point "Actions aimed at our consumers" and sub-point "Product quality and safety", sub-sub-point "Internal audits of stores and distribution centers", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3 and 12
In Portugal and Poland, to position the Companies as promoters of healthy ageing, by democratising access to Private Brand food products that meet internationally recognised nutritional and dietary needs for the +50 age groups.	✓	See subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 3, 10 and 12
In Biedronka, ensure the extension of product guarantee from 2 to 3 years for all electric and additional non-electric non-food products where applicable.	✓	See subchapter 4 "Social information", section 4.2. "Managing social topics", subsection 4.2.3. "Consumers and end users", sub-point "Product innovation", sub-subpoint "Certified ingredients, products and packaging", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12
Monitoring and disclosure of at least 70% (in value) of the social impacts resulting from the annual support offered by all Jerónimo Martins Companies, according to the Business for Societal Impact (B4SI) model and aligned with criteria for the financial materiality.	✓	See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.2. "Affected communities", points "Direct support for affected communities", "Programmes and projects to engage and support affected communities" and "Indirect support for affected communities", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", in this chapter.	SDG 2, 3, 4, 10 and 17
Strengthen the involvement in social projects in all geographies, targeted to children, youngsters and elderly people from vulnerable environments, aiming to directly impact 1 million people per year, until 2026.	✓	See subchapter 4. "Social information", section 4.2 "Managing social topics", subsection 4.2.2 "Affected communities", points "Direct support for affected communities", "Programmes and projects to engage and support affected communities" and "Indirect support for affected communities", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", in this chapter.	SDG 1, 2 and 3
By 2026 in Colombia, ensure that 50% of stores donate food and non-food products to non-governmental organizations, with the aim of supporting vulnerable people.	✓	See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.2. "Affected communities", points "Direct support for surrounding communities", "Programs and projects to involve and support affected communities" and "Indirect support for surrounding communities", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", in this chapter.	SDG 1 and 2
In Colombia, ensure support until 2026, to more than 1.200 community mothers' houses through food and equipment assistance, while simultaneously following-up on nutritional indicators of children under their care. such as anthropometric measures.	✓	See subchapter 4. "Social information", section 4.2 "Managing social topics", subsection 4.2.2. 'Affected communities', points 'Direct support for surrounding communities', 'Programs and projects to involve and support affected communities' and 'Indirect support for surrounding communities', and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", in this chapter.	SDG 1, 2 and 3
In Colombia, ensure at least 200 volunteers participate on environmental protection initiatives and livelihood improvement projects for vulnerable people by 2026.	✓	See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.2. "Affected communities", points "Programmes and projects to engage and support affected communities", sub-point "Volunteering" and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", in this chapter.	SDG 1 and 2
In Colombia, support more than 60.000 people by 2026 in context of vulnerable conditions through humanitarian and livelihood programs, namely with food, prioritizing children and regions with the highest poverty rate and higher food insecurity indicators, by ensuring at least two partnerships with NGOs and/or other industry leaders.	✓	See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.2. "Affected communities", points "How we talk to our affected communities", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", in this chapter.	SDG 1, 2 and 17
Training employees in food hygiene and safety.	✓	See subchapter 4. "Social Information", section 4.2 "Managing social topics", subsection 4.2.1 "Own workforce", point "Health and safety at work", of this chapter. See subchapter 4. "Social Information", section 4.2 "Managing social topics", subsection 4.2.3. "Consumers and end users", point "Actions aimed at our consumers", subpoint "Product quality and safety", sub-subpoint "Food quality and safety internal training", of this chapter.	SDG 3 and 12
Internships in a real work context.	✓	In 2024 we had 451 internships in real work contexts.	SDG 8, 10 and 17

Description		Evidence	Other standards
Young talent programs.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1 "Own work force", point "Training and skills development", sub-point "Leadership development", of this chapter.	SDG 8 and 10
Promoted employees.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1 "Own work force", point "Training and skills development", sub-point "Leadership development", of this chapter.	SDG 8 and 10
Internally mobile employees.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Training and skills development", sub-point "Leadership development", of this chapter.	---
Employees covered by training.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own work force", point "Training and skills development", sub-point "Training", of this chapter.	SDG 8 and 10
Investment in training.	✓	See subchapter 4. "Social Information", section 4.2 "Managing social topics", subsection 4.2.1 "Own work force", point "Training and skills development", sub-point "Training", of this chapter.	---
Internal Social Responsibility Measures.	✓	See subchapter 4. "Social Information", section 4.2 "Managing social topics", subsection 4.2.1 "Own workforce", point "Support to employees and their families", of this chapter.	SDG 1, 2, 3, 4, 8, 10 and 17
Investment in Internal Social Responsibility measures.	✓	See subchapter 4. "Social Information", section 4.2 "Managing social topics", subsection 4.2.1 "Own workforce", point "Support to employees and their families", of this chapter.	---
Human Resources Policies.	✓	See subchapter 4. "Social Information", section 4.1. "Our social policies", of this chapter.	UNGC 6 SDG 5, 8 and 10
Training in human and labor rights policies and practices.	✓	The Group provides training on this subject within the scope of the Code of Conduct and applicable labor legislation. See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1 "Own workforce", point "Ethics and compliance", of this chapter.	UNGC 1
Nationalities of employees.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1 "Own workforce", point "Our employees", of this chapter.	---
Active generations.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1 "Own workforce", point "Our employees", of this chapter.	---
12-month employee retention.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1 "Own workforce", point "Our employees", of this chapter.	---
Average seniority of employees.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1 "Own workforce", point "Our employees", of this chapter.	---
Differentiation between national minimum wage and monthly minimum income.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1 "Own workforce", point "Compensation and benefits", of this chapter.	SDG 1 and 8
% women in engineering and research and development (R&D) roles	✓	34.6%	SDG 5 and 10
% women in information technology (IT) roles	✓	19.9%	SDG 5 and 10
Number of people with disabilities.	✓	See subchapter 4. "Social Information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Diversity and inclusion", of this chapter.	SDG 10 and 17
Resolution mechanisms.	✓	See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1. "Own workforce", point "Ethics and compliance", of this chapter.	---
Operations subject to human rights assessments.	✓	See subchapter 4. "Social information", section 4.2. "Managing social topics", subsection 4.2.1 "Own workforce", point "Ethics and compliance", of this chapter.	UNGC 1
Significant investment agreements and contracts with human rights clauses.	✓	Contracts signed with new suppliers imply knowledge of and adherence to the Jerónimo Martins Group Supplier Code of Conduct. See subchapter 2. "General disclosures", section 2.6. "Our policies", and subchapter 4. "Social information", section 4.1. "Our social-related policies", of this chapter.	UNGC 1 and 2
GOVERNANCE			
Guarantee that at least 80% of the Jerónimo Martins Group's purchases of food products are sourced from local suppliers.	✓	See subchapter 5. "Governance information", section 5.2. "Business conduct", subsection 5.2.1. "Selection and monitoring of suppliers", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	UNGC 8 SDG 12 and 13

Description		Evidence	Other standards
Carry out environmental audits to at least 20% of selected Private Brand and perishables suppliers, based on a risk assessment and with a purchase volume greater than one million euros, in the 2024-2026 period.	✓	See subchapter 5. "Governance information", section 5.2. "Business conduct", subsection 5.2.3. "Engaging with local suppliers" and subchapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 1, 2, and 3
In Poland, carry out inspections to 100% of egg farming units from which Private Brand fresh eggs are produced for Biedronka, until the end of 2024.	✓	See subchapter 5. "Governance information", section 5.2. "Business conduct", subsection 5.2.1. "Selection and monitoring of suppliers", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12
In Portugal and Poland, ensure, by 2026, that animal welfare topics are included in the scope of audits to perishable suppliers who manufacture products containing at least 80% animal protein, and publicly disclose the results.	✓	See subchapter 5. "Governance information", section 5.2. "Business conduct", subsection 5.2.1. "Selection and monitoring of suppliers", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12
In Poland, starting from 2024, carry out 100% of fresh fish from aquaculture audits according to the "Fish Welfare" standard.	✓	See subchapter 5. "Information on governance", section 5.2. "Business conduct", subsection 5.2.1. "Selection and monitoring of suppliers", and sub-chapter 6. "Sustainability commitments", section 6.1. "Commitments 2024-2026", of this chapter.	SDG 12

Table caption:

Indicator verified by an independent external third party.

The expression "UNGC X" refers to the [Principles of the UN Global Compact](#).

The expression "SDG X" refers to the [United Nations Sustainable Development Goals](#).



Translation from the original Portuguese language. In case of doubt, the Portuguese version prevails

Independent Limited Assurance Report on the Consolidated Sustainability Reporting

To the Management
Jerónimo Martins, S.G.P.S., S.A.

Limited assurance conclusion

We have conducted a limited Assurance engagement on the Consolidated Sustainability Reporting of Jerónimo Martins, S.G.P.S., S.A. (the "Group") included in section 5. Sustainability Statement of the Annual Report 2024 (the "Consolidated Sustainability Reporting"), as at 31 December 2024 and for the period from 1 January to 31 December 2024.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Consolidated Sustainability Reporting is not prepared, in all material respects, in compliance with:

- ▶ The European Sustainability Reporting Standards (ESRS), including that the process carried out by the Group to identify the information reported on the Consolidated Sustainability Reporting (the "Process") is in accordance with the description set out in note 5.2.5 Impacts, risks and opportunities management and double materiality assessment of 5.2 General Disclosures; and
- ▶ The disclosures laid down in Article 8 of Regulation (EU) 2020/852 (the "Taxonomy Regulation") included in subsection 5.3.2.6 Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) within the section 5.3 Environmental information of the Consolidated Sustainability Reporting;
- ▶ The sustainability reporting standards of the Global Reporting Initiative - GRI Standards, guidelines of the Sustainability Accounting Standards Board (SASB), technical standards of Regulation (EU) 2022/1288, and internal guidelines considered for reporting performance indicators.

Basis for conclusion

Our limited assurance engagement was conducted in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) "Assurance Engagements Other than Audits or Reviews of Historical Financial Information", issued by the International Auditing and Assurance Standards Board of the International Federation of Accountants and other technical standards and recommendations issued by the Portuguese Institute of Statutory Auditors (*Ordem dos Revisores Oficiais de Contas*).

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under ISAE 3000 (Revised) standards are further described in section "Responsibilities of the Auditor".

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Quality and Independence

We apply the International Standard on Quality Management ISQM 1, which requires that we design, implement, and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

We comply with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) issued by the International Ethics Standards Board for Accountants (IESBA) and of the *Ordem dos Revisores Oficiais de Contas*' Code of ethics

Emphasis of matter

We draw attention to the note of the disclosure requirement S1-16 - Remuneration metrics (pay gap and total remuneration) from table 5.7.1 ESRS - European Sustainability Reporting Standards of the section 5.7 Reporting Frameworks, which describes the fact that the Group does not have in place a methodology to calculate the datapoint Total Remuneration (ratio between the remuneration of its highest paid individual and the median remuneration for its employees) from the disclosure requirement S1-16, having in progress a process for defining a new methodology for its calculation. Our opinion is not modified in respect of this matter.

Responsibilities of the Management for the Consolidated Sustainability Reporting

Management of the Group is responsible for designing, implementing and maintaining a Process to identify the information reported in the Consolidated Sustainability Reporting in accordance with the ESRS and for disclosing this Process in note 5.2.5 Impacts, risks and opportunities management and double materiality assessment of 5.2 General Disclosures of the Consolidated Sustainability Reporting. This responsibility includes:

- ▶ Understanding the context in which the Group's activities and business relationships take place and developing an understanding of its affected stakeholders;
- ▶ The identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- ▶ The assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- ▶ The selection and adoption of methods and making assumptions that are reasonable in the circumstances.

Management of the Group is further responsible for:

- ▶ The preparation of the Consolidated Sustainability Reporting in compliance with the ESRS, the sustainability reporting standards of the GRI Standards, the guidelines of the SASB, the technical standards of Regulation (EU) 2022/1288, and the internal guidelines considered for reporting performance indicators;
- ▶ The preparation of the disclosures in subsection 5.3.2.6 Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) within the section 5.3 Environmental information of the Consolidated Sustainability Reporting, in compliance with Article 8 of the Taxonomy Regulation;
- ▶ Designing, implementing and maintaining such internal controls that Management determines are necessary to enable the preparation of the Consolidated Sustainability Reporting that is free from material misstatement, whether due to fraud or error; and
- ▶ The selection and application of appropriate sustainability reporting methods and making assumptions and estimates about sustainability disclosures that are reasonable in the circumstances.

Inherent limitations in preparing the Consolidated Sustainability Reporting

In reporting forward-looking information in accordance with ESRS, Management of the Group is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

Responsibilities of the Auditor

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the Consolidated Sustainability Reporting is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence economics decisions of users taken on the basis of the Consolidated Sustainability Reporting as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgement and maintain professional skepticism throughout the engagement.

Our responsibilities in respect of the Consolidated Sustainability Reporting, in relation to the Process, include:

- ▶ Obtaining an understanding of the Process but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process; and
- ▶ Designing and performing procedures to evaluate whether the Process is consistent with the Group's description of its Process, as disclosed in note 5.2.5 Impacts, risks and opportunities management and double materiality assessment of 5.2 General Disclosures.

Our other responsibilities in respect of the Consolidated Sustainability Reporting include:

- ▶ Obtaining an understanding of the entity's control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Reporting but not evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness;
- ▶ Identifying disclosures where material misstatements are likely to arise, whether due to fraud or error; and
- ▶ Designing and performing procedures responsive to disclosures in the Consolidated Sustainability Reporting where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the Consolidated Sustainability Reporting.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the Consolidated Sustainability Reporting.

In conducting our limited assurance engagement, with respect to the Process, we:

- ▶ Obtained an understanding of the Process by:
 - performing inquiries to understand the sources of the information used by Management; and
 - reviewing the Group's internal documentation of its Process.
- ▶ Evaluated whether the evidence obtained from our procedures about the Process implemented by the Group was consistent with the description of the Process set out in note 5.2.5 Impacts, risks and opportunities management and double materiality assessment of 5.2 General Disclosures.

In conducting our limited assurance engagement, with respect to the Consolidated Sustainability Reporting, we:

- ▶ Obtained an understanding of the Group's reporting processes relevant to the preparation of its Consolidated Sustainability Reporting by obtaining an understanding of the Group's control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Reporting, but not for the purpose of expressing a conclusion about the effectiveness of the Group's internal control;
- ▶ Evaluated whether material information identified by the Process is included in the Consolidated Sustainability Reporting;
- ▶ Evaluated whether the structure and the presentation of the Consolidated Sustainability Reporting is in accordance with the ESRS;
- ▶ Performed inquiries of relevant personnel and analytical procedures on selected disclosures in the Consolidated Sustainability Reporting;
- ▶ Performed substantive assurance procedures based on a sample basis on selected disclosures in the Consolidated Sustainability Reporting;

- ▶ Obtained evidence on the methods, assumptions and data used on developing material estimates and forward-looking information and on how these methods were applied;
- ▶ Obtained an understanding and evaluated the process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in Consolidated Sustainability Reporting.

Other matters

The comparative information included in the Consolidated Sustainability Reporting of the Group has not been subjected to an assurance engagement, except for the information presented under the GRI Standards sustainability reporting guidelines, the SASB guidelines, technical standards of Regulation (EU) 2022/1288, and internal guidelines considered for reporting performance indicators.

Lisboa, 26 March 2025

Ernst & Young Audit & Associados - SROC, S.A.
Sociedade de Revisores Oficiais de Contas
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