



SUSTAINABILITY
REPORT
for 2025

TABLE OF CONTENTS

Letter from the President of the Management Board of Bielenda Group.....	3	Environment	45
INTRODUCTION	4	ESRS E3 – Water and marine resources	54
About Bielenda Group	5	ESRS E5 – Resource use and circular economy	62
History of Bielenda	8	Society.....	72
Bielenda Group in 2025.....	12	ESRS S1 – Own workforce	73
ESG strategy	16	ESRS S4 – Consumers and end-users.....	87
Information about the organization and reporting basis.....	20	Corporate governance.....	94
Approach to management.....	21	ESRS G1 – Business conduct.....	95
Business model and operations of Bielenda Group.....	26		
Cooperation with stakeholders.....	29		
Double Materiality Assessment: impacts, risks and opportunities.....	31		
Reporting framework and approach	43		

Letter from the President of the Management Board of Bielenda Group

Ladies and Gentlemen,

For our Group, 2025 was a year of consistent implementation of our adopted strategy and of further strengthening the foundations for responsible growth. We continued our intensive efforts to develop our brands, expand our product portfolio and consolidate our position on the Polish market, while at the same time pursuing international expansion. In parallel, we focused on creating long-term value for all stakeholders.

For more than 30 years, we have been building our company on the basis of scientific knowledge, innovation and an understanding of consumer needs. As a result, we are now a global Group with extensive research and development, manufacturing and marketing capabilities, combining operational scale with flexibility and close customer relationships. Continuous growth, however, entails not only ambitious business objectives but also increasing responsibility in the areas of environmental, social and corporate governance.

In 2025, we were pleased to receive the EcoVadis Bronze Medal, which confirms that the ESG strategy we have adopted delivers measurable results and is recognized by independent experts. In the same year, we were also honored with the award from the Polish Private Equity and Venture Capital Association (PSIK) in the category "ESG Initiative of the Year", which motivates us to further improve our responsible business standards.

A key step in 2025 was the development and implementation of a greenhouse gas emissions reduction strategy for Scopes 1 and 2, consistent with the ambition of limiting the global temperature rise as set out in the Paris Agreement. We defined measurable emissions reduction targets and a detailed action plan covering, among other things, increased energy efficiency, a gradual transition to renewable energy sources, and the transformation of our fleet toward low emissions. We see decarbonization as an element of building the organization's resilience to climate risks, rising energy costs and the expectations of business partners regarding transparency and emission reductions across the entire value chain.

The report we are placing in your hands summarizes the next stage of this journey. It presents both our achievements and the areas requiring further action and optimization. I would like to thank all employees, partners and stakeholders for their commitment and shared responsibility for the development of our organization.

I am convinced that, thanks to our joint efforts, we will continue to build a modern, competitive and responsible company – an organization capable of effectively responding to the challenges of the present while boldly pursuing ambitious strategic objectives and looking to the future with courage.

MAREK BIELEND

President of the Management Board, Bielenda Group S.A.



INTRODUCTION

The history of Bielenda Group is one of consistently combining passion and expertise with the courage to embrace change. This synergy has enabled us not only to become a leader in the Polish skincare market but also to build brands that are recognized and valued by consumers both in Poland and abroad.



About Bielenda Group

Leading Polish cosmetics manufacturer

Bielenda Group is a leading Polish manufacturer of skincare cosmetics for women and men of all ages, with a broad portfolio of brands produced at two manufacturing facilities.

The Group includes both well-established brands with a strong market positions and young, innovative brands. Bielenda Group's cosmetics offering is diverse and responds to

the needs of all skin types, various skincare expectations, age groups and consumer purchasing power.

The company's products are available in more than 55 countries worldwide, across both retail (B2C) and professional (B2B) channels. Sales are conducted through drugstore chains and supermarkets, the company's own e-commerce channel, and commercial partners, both online and offline.

Bielenda Group continuously develops its product lines in the categories of face, body and hair care, as well as in the dermo-cosmetics and professional cosmetics segments.

The Group's development is supported by modern research and development facilities and specialized expertise in formulation, technology and regulatory compliance. This enables the company to respond quickly to changing market needs, introduce product innovations, and compete effectively in the international market.



Bielenda in numbers

258

raw material and packaging suppliers

1 015

B2B customers

3%

unadjusted gender pay gap

EUR 128

million in revenue

529

employees

68%

women on the team

55

markets

2

manufacturing facilities

11

brands in the portfolio



Bielenda Group workplaces

DĄBRÓWKA WIELKA

- Bielenda Group Distribution Center
Warehousing and distribution of finished goods for all Bielenda Group brands
- Facility area: 10,400 m²
- Number of employees: 31

KĄTY WROCŁAWSKIE

- Manufacturing facility with integrated office space
- Specializes primarily in the production of facial care, body care, hair care, and oral care products
- Facility area: 7,248 m²
- Number of employees: 198
- E-commerce logistics operations

RADZYMIN

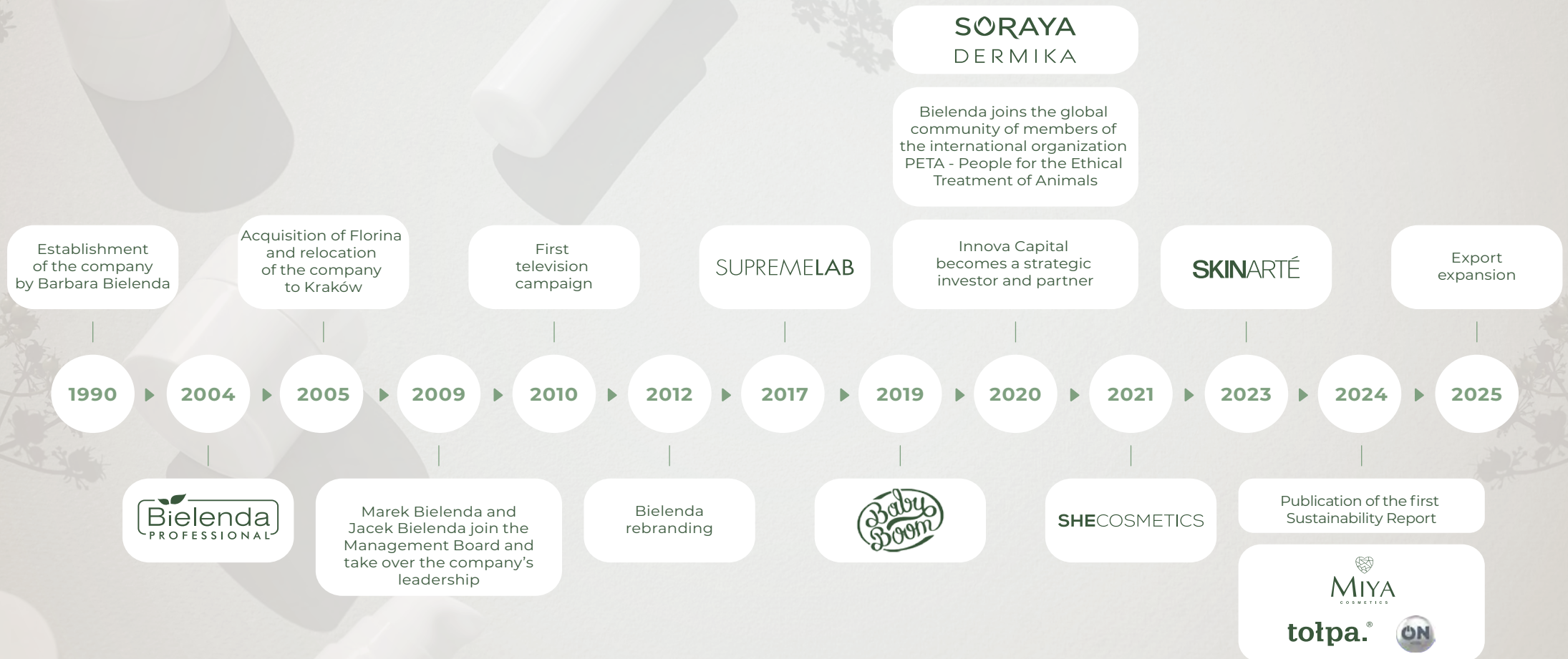
- Manufacturing facility with integrated office space
- Specializes in the production of facial care, body care, and hair care cosmetics
- Facility area: 9,500 m²
- Number of employees: 181
- New warehouse completed in 2025

KRAKÓW

- Main corporate headquarters equipped with office and technological facilities, including the Beauty Institute
- Number of employees: 123



History of Bielenda



THE BIELEND A ECOSYSTEM

Product segments



Facial care:

creams, serums, masks,
gels, toners, scrubs,
micellar waters and oils



Body care:

lotions, oils, scrubs,
hand and foot creams



Hair care:

shampoos, conditioners, masks



Oral care:

toothpastes, mouthwashes



Dermocosmetics:

lines for sensitive skin,
couperose-prone skin,
and acne-prone skin



Cosmetics for men:

Man, ManFoot, Only for men



Bath cosmetics:

shower gels, scrubs



Vegan and natural cosmetics, including:

FaceBoom, Tolpa Green, Vege Detox,
Tolpa Authentic, Pure Trends, Miya



Brand portfolio architecture

Budget segment

SORAYA

Mass segment

Bielenda

Face
Boom

Upper mass segment

MIYA
COSMETICS

SHECOSMETICS

tolpa.®

Premium segment

Bielenda
PROFESSIONAL

SUPREME LAB

Luxury segment

DERMIKA

SKINARTÉ

Sales channels



B2C

own e-commerce



B2B

drugstores and retail chains; e-commerce;
professional channels: beauty salons,
SPA salons, specialist wholesalers



International markets

Targeted foreign expansion and further improvement of operating leverage.



Online channel

Accelerating growth in the online channel in the B2C and B2B areas



Complementary categories

Scaling operations in promising channels and complementary categories



Domestic market

Strengthening the position of the market leader in the domestic market by accelerating the development of the facial and body care categories

Our mission



Delivering to customers in Europe and beyond comprehensive, effective solutions for facial and body care, based on advanced science and aligned with the principles of sustainable development

Our ambition



To strengthen our position as a leading player in facial and body care through the development of products that respond to consumer needs, created with care for quality, effectiveness and innovation



AI AS AN ENABLER SUPPORTING THE ENTIRE ORGANIZATION, IMPROVING SPEED, QUALITY AND THE DECISION-MAKING PROCESS

Operational and logistics strengthening

In parallel, the Company implemented activities to strengthen its operational and logistics base. In 2025, the investment in a modern warehouse in Radzymin was completed and the new Central Warehouse in Dąbrówka Wielka became operational. The centralization of part of the warehouse operations and the shortening of transport distances between key locations contributed to increased operational efficiency, improved inventory management and reduced emissions related to internal transport. At the same time, the Group consistently strengthens its presence in international markets, treating foreign expansion as an important element of its long-term growth strategy.



Central warehouse in Dąbrówka Wielka

The development of the operational base supports the Group's further expansion and strengthens its position on the facial care market.

Strengthening the market position



Leader of the facial care market in Poland



In 2025, Bielenda Group continued its dynamic growth in the facial care market in Poland, consolidating its position as a leader. The company achieved a

17%

value share of the market



In the largest category – face creams – the company recorded value growth of

14%,

while the entire market grew by 5%.



In 2025, the company implemented more than

300

new product launches.



A survey of the awareness and image of cosmetics brands shows that

83%

of respondents recognize the Bielenda brand².

1. Based on Nielsen data, as of Dec-2025.

2. Based on an OMNIBUS CAWI survey (N ≥ 1000, representative sample) conducted by the Ariadna Nationwide Research Panel; the Bielenda brand was measured as a single entity, without separating the Bielenda Supremelab and Bielenda Professional sub-brands.

Bielenda Group in 2025

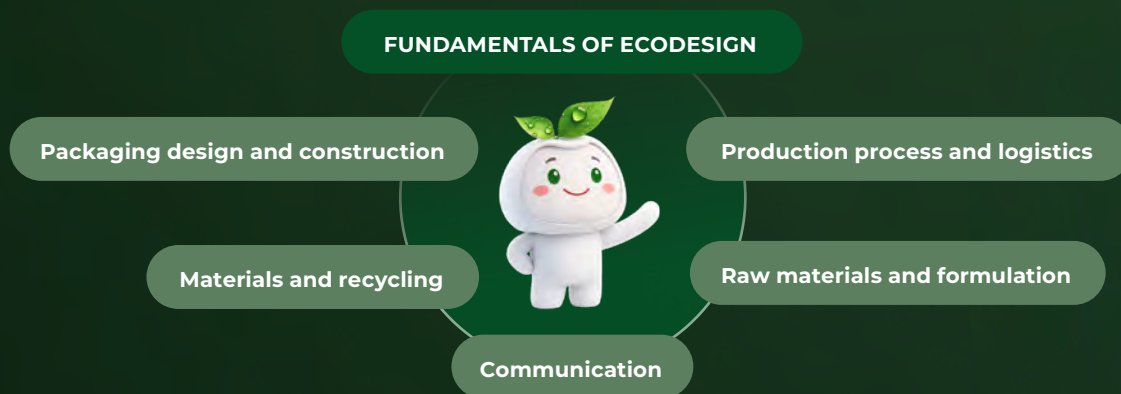
Product and production

Bielenda Group strives to create products consistent with the principles of sustainable development. The strategic objective is to design cosmetics that respond to consumer needs while limiting environmental impact.

Key achievements in 2025

One of the Company's most important achievements was the development of a decarbonization strategy for Scopes 1 and 2, covering the horizon to 2030. The strategy relates to ESRS E1, is consistent with the GHG Protocol methodology and aligns with the objectives of the Paris Agreement. The document sets out the directions of action necessary to achieve a 55% reduction in emissions by 2030 relative to the 2021 base year. From 2025 onwards, the decarbonization strategy forms an integral element of the Company's development planning, investments and operational decisions, strengthening its long-term resilience and environmental responsibility.

In 2025, Bielenda Group implemented an Ecodesign Code, establishing standards for designing products that limit negative environmental impact and supporting the transformation of the portfolio toward a circular economy. The document covers the following key assessment areas:



From 2026 onwards, all new products will be assessed against the defined criteria of the Code, which will enable systemic management of their environmental impact and strengthen the organization's resilience to the risk of regulatory non-compliance, including risks associated with greenwashing.

In parallel, the Company is developing a packaging management tool that will support the assessment, monitoring and development of packaging solutions in line with the concept of a circular economy.



Carbon footprint in Scopes 1 and 2

TARGET 2025

Build an emission reduction strategy for Scopes 1 and 2 using the market-based method.

- Reduction of Scope 1+2 emissions by 55% by 2030 relative to 2021
- Compliance with the GHG Protocol methodology and the objectives of the Paris Agreement

2025 RESULT



ACHIEVED



Ecodesign

TARGET 2025

Create an Ecodesign Code.

- QR code on products from 2026, redirecting to a page on waste segregation
- Development of a packaging management tool

2025 RESULT



ACHIEVED

Bielenda Group in 2025

Key achievements in 2025

In 2025, we increased the share of suppliers verified for ESG to 98%, exceeding the established target of 60%.

In the area of formulations we maintained a high level of compliance with environmental objectives. The share of products free from microplastics amounted to 98%, and the share of products free from harmful nanomaterials reached 100%. We also increased the share of products free from cyclic silicones to 99%.

Suppliers* verified for ESG

98%

Achievements in the area of raw materials



* Suppliers understood as suppliers of raw materials and packaging

(1) Values calculated on the basis of indices

(2) Excluding UV filters

Bielenda Group in 2025

Partnership and cooperation

Over the past year, Bielenda Group developed standards for a responsible supply chain. In 2025, 90% of strategic suppliers were covered by the Supplier Code, exceeding the target set at 70%. This represents significant progress in building transparent and consistent principles of cooperation with business partners.

Team and ESG management

In the area of diversity and equal treatment, Bielenda Group consistently strengthens activities aimed at building a fair and transparent work environment. One element of this approach is the analysis of the pay gap, which makes it possible to monitor the level of pay equality and identify areas requiring further attention. In 2025, the unadjusted pay gap amounted to 3%, and was thereby reduced by 0.4 percentage points compared with 2024. As part of intensified activities in this area, the Company calculated its adjusted pay gap for the first time, which amounted to 2.6%. These results confirm that the Company maintains a high level of control over the issue of pay equality and treats it as a permanent element of responsible personnel management.

Bielenda Group consistently developed processes supporting employees, both in the area of wellbeing and in building engagement. In 2025, the employee engagement index amounted to 73% and thus rose by 7 percentage points compared with 2024. An important element of these activities was also the development of wellbeing initiatives. Employees were given access to the Hedeply application. The platform provides:

- sessions with certified therapists and psychologists
- an application and 24/7 support chat
- access to specialists such as psychodietitians, physiotherapists, coaches and others
- articles, tests and exercises supporting personal development
- monthly live webinars with experts
- training for leaders and First Time Managers

	2024 RESULT	2025 RESULT
 Strategic suppliers covered by the Supplier Code of Conduct	76%	90%
 Pay gap control as an element of strengthening equality	3.4% unadjusted pay gap	3% unadjusted pay gap 2.6% adjusted pay gap
 Employee engagement survey	43% participation 66% engagement	53% participation 73% participation



Industry awards and distinctions

Our activities and products are appreciated by consumers, industry organizations and the media.

3

times in a row the title of the
Strongest Media Brand in Poland
in the Top Marka ranking

More than 20

products and product lines
awarded in various categories

33

awards won in 2025,
including



In the **Vogue Beauty Awards 2025** poll, two products from the Bielenda Group portfolio were awarded – the **Bielenda Hydro Lipidium moisturizing and soothing barrier body lotion** and the **Dermika 100% for Men smoothing anti-wrinkle cream 40+**. This distinction is awarded to cosmetics with the best compositions and the highest efficacy.

In parallel with market expansion and the introduction of innovative products valued by consumers, the Company continued its work on improving its sustainability management system. Key projects were initiated – concerning, among other things, the decarbonization of operations, packaging ecodesign, the development of a responsible supply chain and the promotion of an organizational culture based on engagement and diversity.

Progress in the EcoVadis assessment

In May 2026, Bielenda Group improved its result in the EcoVadis assessment, advancing from the bronze medal obtained in 2025 to a silver medal. The overall score rose from 63/100 to 76/100, and the percentile position improved from the 75th to the 90th percentile. The Company thus placed in the **Top 10% of assessed companies**.

An improvement was recorded in all four assessed areas: environment, labor law and human rights, ethics, and sustainable procurement.



Advance from bronze
to silver medal



Overall score

63/100 → 76/100

Overall percentiles

75. → 90.



Environment

63 → 80



Labor law and
human rights

63 → 75



Ethics

60 → 69



Sustainable
procurement

62 → 74



■ Score 02.2025 ■ Score 05.2026

ESG strategy

In 2025, Bielenda Group focused on the practical implementation of the assumptions of the ESG strategy and on strengthening the foundations of responsible growth. Key activities included completing the investment in a modern warehouse in Radzymin, the operational launch of the new Central Warehouse in Dąbrówka Wielka, developing a decarbonization strategy for Scopes 1 and 2, and creating an Ecodesign Code supporting the development of more responsible packaging and products.

In 2026, the Company plans to further pursue the adopted ESG directions, including the continuation of decarbonization activities and the development of tools supporting ecodesign. As part of implementing the assumptions of the Ecodesign Code, work has begun on a dedicated tool enabling verification of the compliance of new products with the adopted guidelines.

Sustainable development is for us an increasingly important and mature element of our business strategy. Year after year, we develop our approach, strengthening our activities in the areas of innovation, responsible product design and the circular economy.

We are becoming increasingly effective at translating our ambitions into concrete actions and results – we consistently reduce our environmental impact, support diversity and develop transparent and ethical corporate governance. Sustainable development remains an integral part of our decisions and the direction of our further development.

IRENEUSZ SUDNIK

General Director, Vice-President of the
Management Board of Bielenda Group



Key pillars of the ESG strategy

The strategy addresses sustainability challenges that are important for the market and the cosmetics industry.



Covers the horizon of 2025–2050 across 7 strategic commitments and 13 ESG areas



Includes documented actions based on indicators that support the achievement of each commitment.



Takes into account trends and the level of competitors' good practices, **investor expectations, and prepares for upcoming regulatory requirements**

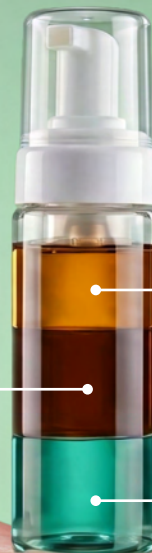


Assumes acceptance of **responsibility** for implementation and cyclical monitoring of the ESG Strategy results by the Management Board

PILLAR 2

PARTNERSHIP AND COOPERATION (auxiliary ingredients)

We want to build lasting relationships with our stakeholders, in particular with local communities, customers and suppliers, sharing the knowledge and resources at our disposal.



PILLAR 1

PRODUCT AND PRODUCTION (active ingredients)

Flexibility and innovation are Bielenda's strengths. We are actively involved and use them to popularize the principles of sustainable development in cosmetic products and in the process of their production.

PILLAR 3

TEAM AND MANAGEMENT (base)

The basis of our development is the unique competences of our team and an effective approach to ESG management. We strive to ensure that the company's development supports the improvement of competences and higher job satisfaction among our employees. We have built the foundations of effective ESG management within the organization.

Key assumptions of the ESG strategy

	Commitment	KPI	2024 result	2025 result	2025 target	2030 target	2050 target
Pillar 1. Product and production (active ingredients)	We will source raw materials in a sustainable way	% of strategic suppliers verified against ESG criteria	84%	98%	60%	100%	100%
		% of purchased palm oil with RSPO certification ³	71%	79.0%	72%	95%	100%
	The quality and safety of Bielenda products are our priority	% of raw materials in products free from microplastics ³	95%	98.3%	98%	99%	100%
		% of raw materials in products free from harmful nanomaterials ⁴	95%	100%	100%	100%	100%
		% of raw materials in products free from cyclic silicones ³	94%	98.9%	97%	100%	100%
	Decarbonization and climate neutrality as an integral part of conducting business	Carbon footprint in Scopes 1 and 2	Calculations for the whole organization	✓	Build a carbon footprint reduction strategy	Reduction of 55% relative to 2021	Reduction of 100% relative to 2021
		Carbon footprint in Scope 3	n/a	✓	Begin data collection for Scope 3	To be determined	To be determined
	We will create an Ecodesign Code which will serve to assess our products and act as a benchmark for new launches – Care for natural resources, minimization of pollution and the circular economy	% of products compliant with ecodesign principles	n/a	✓	Develop the eco-design code	50%	100%
		% (content) of recycled material in packaging ³	15%	16%	Build a packaging management tool	>35%	>65%
Pillar 2. Partnership and cooperation (auxiliary ingredients)	We want to build socially responsible brands that will respond to the new needs of consumers, business partners and local communities We want to build socially responsible brands	% of employees involved in volunteering / social activities	7%	15%	15%	20%	20%
		% of strategic suppliers covered by the Supplier Code	76%	90%	70%	100%	100%
Pillar 3. Team and ESG management (base)	We will always put the safety of our employees first. We want to create a friendly workplace for every employee, regardless of gender, age, origin or beliefs. At the same time, our goal is to grow our business through the development of our employees	Pay gap	3.4%	Unadjusted = 3%, Adjusted = 2.6%	<5% (unadjusted gap), calculate adjusted gap	<5% (adjusted gap)	<5% (adjusted gap)
		Number of serious accidents at work	0	0	0	0	0
		Employees covered by the employee assessment and development program	25%	✓	50% employee appraisal (Stage II) 100% of staff covered by development plans	100%	100%
		Employee engagement index following the engagement survey	66%	73%	>60%	>70%	>70%
	We embed sustainable development in our management model	Number of meetings held with the Supervisory Board and the Management Board regarding ESG (twice a year for the Supervisory Board, once per quarter for the Management Board)	2	7	6	6	6
		EcoVadis certification	Bronze Medal	Silver Medal	Bronze Medal	Gold Medal	Platinum Medal

3. Values calculated on the basis of indices.

4. Excluding UV filters (the risk of skin cancer in humans is more serious than the potential contamination of the aquatic environment by UV filters). Suppliers are understood as suppliers of raw materials, packaging and products.

THINK OF YOURSELF AND ACT!

The Bielenda Group campaign encourages people to take care of themselves – both physically and emotionally. We provide expert knowledge, inspire action and strengthen a sense of agency.

In 2025 Bielenda Group continued to develop its own educational and communication platform in the form of the podcast “Think of yourself and act!” (“Pomyśl o sobie i działaj!”). Its aim is to strengthen women’s self-confidence, motivate them to take on new challenges and support their pursuit of psychological wellbeing and full life satisfaction – in line with the pro-age philosophy.

To this end, we created a range of valuable materials to read, listen to and watch – with the support and participation of respected female experts: psychologists, psychotherapists, personal development trainers, academic lecturers and special guests. In this way we created a multidimensional social program that serves as a source of knowledge, motivation and inspiration encouraging self-development and strengthening self-confidence in everyday life.

VIDEO PODCASTS – THE KEY FORMAT OF THE CAMPAIGN

The total reach of the campaign’s communication activities, covering video podcasts and promotional materials, amounted to 348,000 views and listens on the YouTube, Spotify and Apple Podcasts platforms. In addition, excerpts of conversations and trailers promoting the video podcasts, published on social media channels – Instagram (Reels), YouTube (Shorts), Facebook and LinkedIn, both on the profiles of Bielenda Group, of the magazine “Zwierciadło”, and of the hosts and interviewees – generated a total of 4,217,255 views.

As a result, the total reach of the “Think of yourself and act!” campaign in the period from December 2024 to July 2025 reached 5,224,847 contacts, confirming its wide reach and high communication effectiveness.

CAMPAIGN REACH in 2025**348 thousand****Views and listens**

YouTube, Spotify and Apple Podcasts

over 4,217 thousand**Views of conversation excerpts and promotional materials**

Instagram (Reels), YouTube (Shorts), Facebook, LinkedIn

approx. 5,225 thousand**Total campaign reach**

(December 2024 – July 2025)

Key survey results⁵ regarding the assessment of campaign materials**95%⁶**

of respondents considered that the episodes had a positive effect on their **psychological wellbeing**

**93%**

of respondents declared that the episodes encouraged them to take **action for themselves**

**93%**

of respondents stated that the episodes motivated them to build self-confidence

Beauty and health

I believe that consumer education is one of the most responsible steps a brand can take. That is why in 2025, out of a passion for creating content, I created a new podcast in which reliable expert knowledge meets the authentic engagement of the audience – a space for the modern consumer who is looking for a guide they can trust. Each episode addresses topics that have real significance for everyday choices, building a relationship based not on a sales message but on competence and credibility.

Materials are available on the Bielenda Institute of Beauty channel on YouTube.

Monika Hudyka
Manager of the Bielenda Institute of Beauty



5. The survey of the “Think of yourself and act” social campaign was conducted by the research agency SW Research in April 2025 using a qualitative-quantitative method, N=68.

6. “Yes” responses.



INFORMATION ABOUT THE ORGANIZATION

and reporting basis

A properly designed structure is not only about order, but also about direction. It enables us to act with purpose, measure results, and build an organization that connects everyday work with a long-term vision.



Approach to management

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

Management Board of Bielenda Group S.A.

The Management Board of Bielenda Group plays a key role in supervising the implementation of the sustainability strategy, in accordance with the requirements of the European Sustainability Reporting Standards (ESRS). It is responsible for defining strategic objectives in the ESG area, for integrating environmental, social and corporate governance issues within the Company's operating activities, and for monitoring risks and opportunities related to sustainable development.

Within the scope of its competences, the Management Board ensures an appropriate management structure, supports the creation of policies and supervises ESG reporting processes. In doing so, it strives to ensure transparency, accountability and long-term value for all stakeholders.



Marek Bielenda

President of the Management Board of Bielenda Group S.A.



Robert Dobrowolski

Vice-President of the Management Board for Finance and Implementation of the Strategy of Bielenda Group S.A.

Katarzyna Butrymowicz-Knap

Vice-President of the Management Board of Bielenda Group S.A., Marketing Director



Marzena Kalinowska

Vice-President of the Management Board of Bielenda Group S.A., Commercial Director

Ireneusz Sudnik

Vice-President of the Management Board of Bielenda Group, General Director⁷



⁷ Appointed to the Management Board in 2025.

Supervisory Board of Bielenda Group S.A.

The Supervisory Board oversees the implementation of the ESG strategy and monitors the Company's activities in the area of sustainable development. Its members bring diverse experience and competencies that support effective supervision of the environmental, social and corporate governance areas. The Board assesses ESG risks, monitors progress in achieving objectives and supports long-term value for stakeholders. At present, the Board does not include independent members.



Jacek Bielenda

Chairman of the Supervisory Board of Bielenda Group S.A.



Leszek Muzyczyszyn

Deputy Chairman of the Supervisory Board of Bielenda Group S.A.



Katarzyna Marchlewska-Sieczek

Member of the Supervisory Board of Bielenda Group S.A.



Paweł Wojas

Member of the Supervisory Board of Bielenda Group S.A.



Marcin Czarnecki

Member of the Supervisory Board of Bielenda Group S.A.



Adam Jabłoński

Member of the Supervisory Board of Bielenda Group S.A.



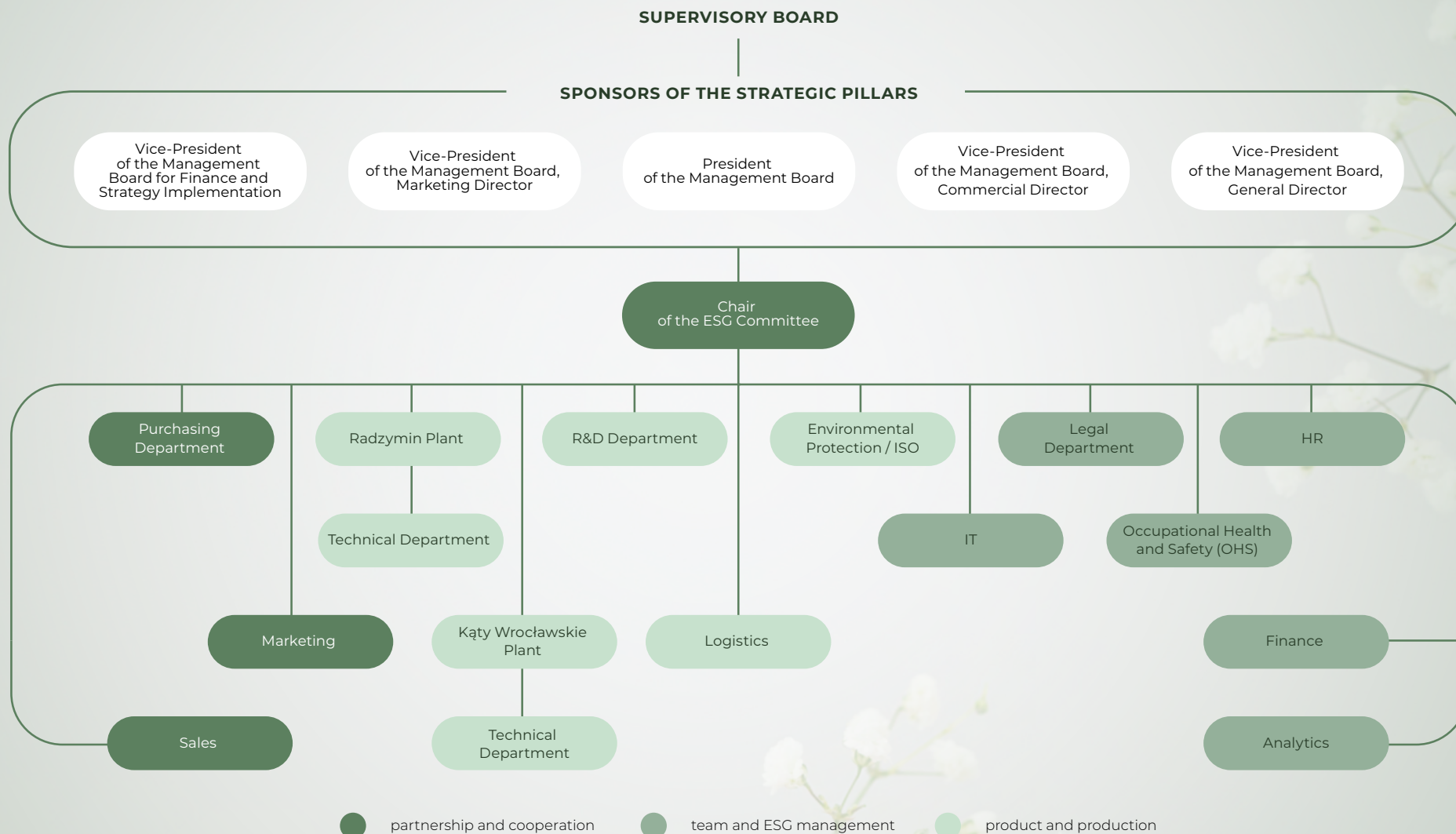
Robert Rogowski

Member of the Supervisory Board of Bielenda Group S.A.



Magdalena Kowalska

Member of the Supervisory Board of Bielenda Group S.A.



ESG responsibility structure (detail)

Role	Responsibility
Supervisory Board	- Supervision of the ESG strategy and its alignment with the long-term objectives of the Company and stakeholders - Assessment and monitoring of ESG risks and the adequacy of the mechanisms for managing them - Assessment of ESG progress and performance against targets - Supervision of investments and initiatives supporting sustainable development
Management Board	- Implementation of the ESG strategy and approval of key ESG policies and objectives - Integration of ESG into business decisions and long-term development - ESG risk management and dialogue with key stakeholders - Responsibility for the Company's ESG results and the implementation of actions
Chair of the Committee	- Coordination of the work of the ESG Committee and supervision of ESG projects - Development and updating of the strategy, reports and ESG indicators - Reporting ESG progress and risks to the Management Board and the Supervisory Board - Ensuring the compliance of the policies adopted in the organization with regulations and good practices - Promoting ESG awareness within the organization
Members of the ESG Committee	- Cooperation in creating and implementing the ESG strategy and reports - Monitoring ESG risks and opportunities in assigned areas - Implementation of activities in line with the ESG matrix - Incorporating stakeholder opinions into ESG activities - Promoting compliance with the policies adopted in the organization

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

Meetings concerning the management of the ESG area within the Group are held regularly at various organizational levels, in accordance with an established schedule. The purpose of the meetings is to **manage sustainable development in a manner integrated with our regular processes and risk management controls.**

During the reporting period, the ESG Committee worked jointly on identifying material impacts, risks and opportunities, which resulted in the Double Materiality Assessment. The conclusions of the analysis were presented to the Management Board and the Supervisory Board and approved by them.

Participants of the meetings	Frequency of meetings
Members of the ESG Committee and the Chair of the ESG Committee	once a month
Chair of the ESG Committee and the Management Board	once a quarter
Chair of the ESG Committee, Management Board, Supervisory Board	twice a year

As part of managing the ESG area, regular meetings are organized for members of the ESG Committee, during which the status of ongoing activities, identified project risks, proposed solutions and plans for the next stages of work are discussed.

Additional meetings of ESG Committee members with the Chair are held depending on operational needs, and the presence of individual members depends on current projects. The composition of the ESG Committee has been presented in the infographic in point GOV-1.

The Supervisory Board, together with the Management Board and the Chair of the ESG Committee, meets twice a year to review the activities undertaken in the ESG area, verify them, make any corrections and approve further steps. In December 2024, a meeting was held at which the results of the Double Materiality Assessment, the ESG strategy and the status of key activities were presented. Following their acceptance, the duties associated with the implementation of individual activities were assigned to specific departments, in accordance with their thematic scope.

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

At Bielenda Group, we have introduced, for some members of senior management, a system of incentive remuneration linked to the implementation of the ESG strategy. These are variable remuneration components, dependent on the level of implementation of the ESG strategy.

Due to the confidential nature of certain financial information, including detailed remuneration amounts, these remain undisclosed, as they constitute a trade secret.



GOV-4 – Statement on due diligence

Bielenda Group exercises due diligence in, among other areas, its **social and employee-related activities, as well as environmen-**

tal protection and environmental management. These aspects are described in the relevant sections of this report, as indicated in the table below:

Core elements of the due diligence process	Impact in the areas of: social and employee matters, environmental protection and governance
Embedding due diligence in governance, strategy and business model	• Policies related to the environment • Policies related to own workforce • Policies related to consumers and end-users
Engaging with affected stakeholders in all key steps of the due diligence process	• SBM-2 – Interests and views of stakeholders • Cooperation during the performance of the Double Materiality Assessment is described in the sub-section on the process for identifying and assessing material impacts, risks and opportunities
Identifying and assessing adverse impacts	• Processes to remediate negative impacts and channels for raising concerns by own workforce • Processes to remediate negative impacts and channels for raising concerns by consumers and end-users
Taking action to address adverse impacts	• Actions and resources in relation to climate policy • Actions and resources related to water and marine resources • Actions and resources related to resource use and the circular economy • Actions taken to address material impacts on consumers and end-users, approaches to managing material risks and opportunities related to consumers and end-users, and the effectiveness of those actions
Tracking the effectiveness of these efforts and communicating relevant information	Risk management and internal controls over sustainability reporting

In 2025, no due diligence procedure was carried out for any of the areas described in this report.

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

The bodies responsible for supervising the implementation of ESG activities are the Supervisory Board and the Management Board.

The ESG Manager reports directly to the Management Board and the Supervisory Board, presenting the progress of projects and activities undertaken by individual members of the ESG Committee in accordance with the schedule described in GOV-2.

In 2024 a Double Materiality Assessment was carried out, based on which the ESG strategy was created. The tool used to monitor the progress of individual activities is the ESG matrix. Each designated member of the Committee is responsible for collecting the required data. The ESG Manager then verifies the quality and completeness of the data

Internal control procedures include the cyclical verification of the materiality analysis process and its update, adjusted to changing regulations and market conditions.

Business model and operations of Bielenda Group

SBM-1 – Strategy, business model and value chain

About the company

Bielenda Group is a company with more than 34 years of experience in the cosmetics industry. It specializes in creating innovative facial and body care products, both for professionals (including beauty salons and SPAs) and for retail customers (including drugstores and e-commerce).

Infrastructure

The Company has **two manufacturing plants and a headquarters with an extensive research and technology base**. A team of chemists, biotechnologists and technologists makes it possible to carry out in-house R&D projects, develop patents and rapidly implement innovations.

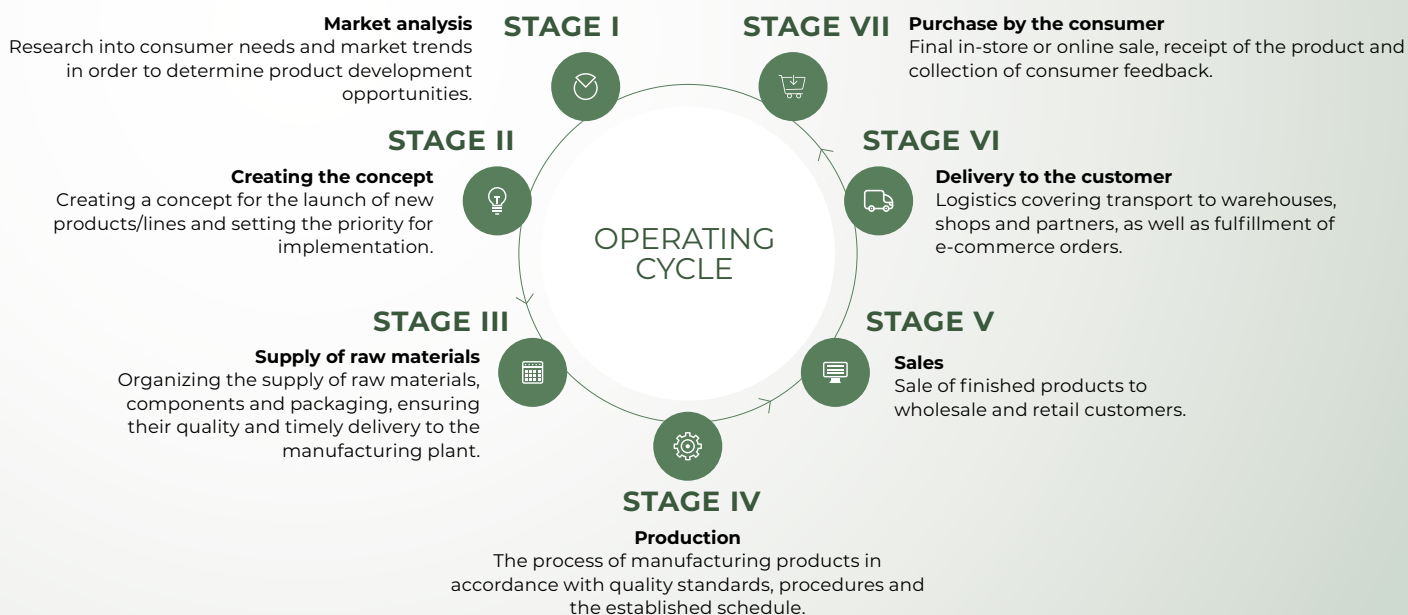
Business model

Bielenda's business model is based, among other factors, on the synergy between innovation and product development, as well as the latest market trends and customer needs. The Company invests intensively in the development of retail and professional brands, strengthening its portfolio through acquisitions – in recent years, brands such as Soraya, Dermika, Body Boom, SHECosmetics, tołpa and Miya have joined the Group. These activities are financially supported by the Innova Capital fund, which has been the Company's strategic partner since 2020. At the same time, Bielenda is expanding its export activities, adapting its offering to consumer expectations in more than 55 countries.

Operationally, the Company works in an end-to-end model, covering the full cycle of purchasing raw materials and components, production, warehousing, transport and sales. The process begins with the delivery of packaging, components and raw materials, which go to in-house or contract manufacturing. Finished goods are stored in appropriate conditions, which ensures their durability.

In subsequent stages the process covers logistics – transport to trade partners and deliveries to retail networks, beauty salons and e-commerce platforms. The final link in the chain is the purchase by the end user – both in online and offline channels. The aim of each stage is to ensure high product quality, product availability and compliance with the expectations of various consumer groups.

Operating cycle within the Bielenda Group business model



Bielenda Group value chain

Bielenda Group operates within a comprehensive value chain, covering the supply phase (upstream), own operations, as well as distribution and the end of the product life cycle (downstream). The business model is based on the development and sale of cosmetics, while maintaining high standards of quality and social

responsibility. The Company invests in the development of internal competences – including R&D, production and quality departments – while at the same time engaging external partners in the area of raw material and packaging supply and manufacturing services.

UPSTREAM			OWN OPERATIONS			DOWNSTREAM	
SUPPLIERS (raw materials)	SUPPLIERS (materials)	SUPPLIERS (services) –	PRODUCTION PROCESSES	NON-PRODUCTION PROCESSES	SALES AND MARKETING	PRODUCT USE	END OF LIFE
Suppliers of basic resources for production: - cosmetic ingredients (bases, fragrance compositions and others) Energy resources: - electricity - natural gas - compressed air - heating oil	Suppliers of materials for production: - packaging - labels - bulk/collective packaging (Suppliers located mainly in the EU and Asia)	Suppliers providing services enabling the execution of production and sales processes and customer service, including: - warehouse rental - transport services - machinery park services - contract manufacturing of cosmetics	Processes and activities carried out by each manufacturing plant: - development of new products - sourcing of raw materials and packaging - testing and certification - preparation and planning of production - production - quality control - packaging/finishing - warehousing and logistics - inventory management	- Administration - HR - Training and development - OHS - Environmental protection - Finance and controlling - Management and investor relations - Legal services and compliance	- Wholesale and retail sales (B2B, B2C) - Customer service and complaints - Marketing - Brand & trade	- Product management on the customer's side – the retail network. - Use of the product by the end customer (B2C).	- After the packaging/ product has been used, the consumer (end user) and the customer (direct B2B customer) generate waste and decide how it is segregated. It is then directed to appropriate forms of disposal or recycling. - Presence of cosmetic ingredients in water/soil.

Three key segments can be distinguished in the Group's value chain:

1. Upstream – supplies and services

Bielenda Group cooperates with many suppliers of raw materials (including cosmetic bases and fragrance compositions) and packaging materials from Poland and abroad. The company's partners also include entities providing services supporting production, such as logistics, warehouse space rental and contract manufacturing. Suppliers of energy and utilities necessary in industrial processes also play an important role.

2. Own operations

The Company carries out key internal processes in the areas of research and development, planning, production, quality control, logistics and administration. It invests in developing the competences of its teams through systematic training, ensures compliance with legal regulations, and implements internal procedures for compliance management and investor relations.

3. Downstream – distribution and end of product life

Bielenda Group addresses its offering both to business customers (B2B) and directly to consumers (B2C). It carries out sales and marketing processes, handles complaints and analyzes product use and its environmental impact after use – including the issue of the presence of cosmetic ingredients in the ecosystem. This model also assumes the shared responsibility of business partners (offline and online points of sale) for the proper disposal of products.

Distribution of product sales



Sales structure at Bielenda Group

In the sales structure, the dominant category comprises products from the economy and upper mass-market segments, confirming the Company's strong focus on the mass market. At the same time, the presence of budget and premium segments indicates the gradual diversification of the Company's portfolio and its broader price positioning.

Facial care products account for almost three-quarters of total sales and constitute the main pillar of Bielenda Group's offering. The brand development strategy is centered around this category. Body care products (10%) and other cosmetics also have a significant share and – despite their smaller contribution to sales – enjoy stable market interest.

Cooperation with stakeholders

SBM-2 – Interests and views of stakeholders

The Double Materiality Assessment covered the interests and views of stakeholders, including the identification of key stakeholder groups, their objectives and forms of engagement. The Company communicates regularly with stakeholders through, among other things, marketing campaigns, social media and newsletters.

Key stakeholder	Purpose of engagement and integration of key stakeholder needs into the Company's strategy and business model	Manner and organization of engagement	Most important topics
B2B customers	B2B customers, including drugstores, play a key role in the Bielenda Group business model, accounting for a significant volume of wholesale and retail sales. Thanks to regular contact with business partners, the Company can continuously analyze their requirements regarding product quality, terms of cooperation and ESG standards. Matching the offering to the expectations of key customers supports sales growth, builds partner loyalty and strengthens the brand's market position.	Ongoing contact, including analysis of requirements (also in the area of ESG)	Quality requirements, ESG, commercial terms
Consumers (end users)	End consumers are key stakeholders of Bielenda Group – their expectations regarding the quality, safety and composition of cosmetics directly influence the product design and development process. The Company monitors consumer needs, ensuring transparency, certification of compositions and communication based on trust and reliable declarations. The satisfaction, loyalty and opinions of end users are an important factor in building competitive advantage and implementing the brand development strategy.	Marketing campaigns, PR, social media	Composition, safety, availability

Key stakeholder	Purpose of engagement and integration of key stakeholder needs into the Company's strategy and business model	Manner and organization of engagement	Most important topics
Administrative and office employees	Administrative and office employees play a key role in supporting management, maintaining the continuity of office work and the quality of operational processes. The Company places particular emphasis on occupational safety, effective internal communication and the systematic strengthening of organizational structures. Care for employee engagement and satisfaction directly affects operational efficiency, the high quality of the processes carried out and the long-term organizational stability of the Company.	Meetings, newsletters, internal communication	Organizational changes, structures, ESG
Production employees and temporary employment agencies	Production employees and persons employed by temporary employment agencies provide Bielenda Group with operational continuity and flexibility of production processes. The Company ensures safe and stable working conditions, the implementation of OHS standards and communication supporting team engagement. These activities minimize the risk of disruption, increase operational efficiency and enable a flexible response to changing market needs, which directly supports the achievement of production and business objectives.	Production meetings, information boards	OHS, working conditions, employment stability

Key stakeholder	Purpose of engagement and integration of key stakeholder needs into the Company's strategy and business model	Manner and organization of engagement	Most important topics
Suppliers of raw materials and materials	Suppliers of raw materials, packaging and logistics services play a key role in ensuring the continuity and quality of Bielenda Group's production. The Company engages in building long-term, partnership relations based on transparency, quality and joint development. Such cooperation makes it possible to manage supply chain risk effectively, optimize purchasing processes and increase the value of the final products – which translates into the competitiveness of the offering and the company's operational stability.	Audits, questionnaires, supplier assessment	Quality, delivery deadlines, certification
Production subcontractors	Production subcontractors support the Company in fulfilling orders during periods of increased demand or limited availability of its own production capacity. Thanks to a flexible model of cooperation, Bielenda Group ensures continuity of supply while maintaining high standards of product quality and safety.	Orders, operational contact	Product quality, compliance with standards
Industry associations	Industry associations are an important forum for Bielenda Group to exchange knowledge, experience and best practices. Participation in the work of working groups makes it possible to actively shape regulations, prepare better for upcoming changes and respond more quickly to key market and regulatory trends.	Participation in working groups, conferences	Legal changes, green claims, circular economy
Public administration / Regulator	Public administration is a strategic partner in ensuring regulatory compliance. Cooperation with supervisory authorities enables Bielenda Group to conduct its operations safely and manage regulatory risks effectively.	Obtaining permits, monitoring legal changes	Legal compliance, safety
Investors	Shareholders and the Supervisory Board support the implementation of the Company's development strategy and supervise progress in the ESG area. Regular reporting enables effective strategic management and transparent communication of development directions.	Supervisory Board, ESG reporting	Business and ESG objectives
Financial institutions	Financial institutions support the Company in financing operating and investment activities, enabling development and flexible access to capital.	Arrangements, reporting	Creditworthiness, ESG

Key stakeholder	Purpose of engagement and integration of key stakeholder needs into the Company's strategy and business model	Manner and organization of engagement	Most important topics
Media	The media play an important role in building the brand image, increasing its recognition and supporting communication with consumers and partners through PR activities and marketing campaigns.	PR campaigns, media contacts	Image, media activities, social activities
Local communities and non-governmental organizations (NGOs)	Local communities are an important stakeholder from the perspective of social responsibility – through charitable activities and support for local initiatives, Bielenda Group builds social acceptance of its operations and strengthens its image as a responsible and engaged neighbor.	Donations, CSR activities, partnership projects	Local support, building relationships
The natural environment	The natural environment is the foundation of Bielenda Group's activity – the raw materials used in production come from nature, and production and logistics processes have a direct impact on the surroundings. That is why the Company actively manages environmental risks, undertaking activities that limit its impact and promoting more sustainable practices across the entire value chain.	Management of emissions, waste, raw materials	Environmental changes



Double materiality Assessment: impacts, risks and opportunities

Material impacts, risks and opportunities and their interaction with strategy and business model

Double materiality Assessment is a process of assessing the sustainability topics that are of greatest significance – both from the point of view of the company's impact on its surroundings and of the impact of ESG factors on the Company's activities. Its purpose is to identify

material impacts, risks and opportunities associated with the functioning of the enterprise in the context of sustainable development. At Bielenda Group this process was carried out in 2024 in accordance with the requirements of the CSRD directive and the ESRS standards in force as at the date of preparation of the report. Both the actual and the potential impact of the Company's activity on the environment and society were taken into account, as well as the

company's exposure to sustainability-related risks and opportunities – in the short-, medium- and long-term horizon. As a result of the analysis, key topics material for the ESG strategy and non-financial reporting were identified. The information collected was used to update the sustainability strategy and to prepare this report. A description of the process for identifying and assessing material impacts, risks and opportunities is set out in detail in IRO-1.

Impact, risk or opportunity (IRO)		Time horizon	Location of the material impact, risk or opportunity	Current and future effects, including financial	Response
ESRS E1 Climate change					
Climate change mitigation – Scope 1 and 2 GHG emissions					
Impact: greenhouse gas emissions (Scopes 1 and 2), covering the consumption of gas, heating oil and energy at manufacturing plants, and fuel in transport.	Negative actual impact	Short-, medium- and long-term	Own operations	The planned purchase of green energy and further investments in the rational use of utilities entail additional financial outlays associated with budgeting modernization projects and the energy transformation of manufacturing plants.	Since 2023 the Company has monitored greenhouse gas emissions in Scopes 1 and 2 and implements measures in accordance with the adopted environmental quality improvement plan. These initiatives focus on increasing the energy efficiency of manufacturing plants as an element of broader environmental objectives. The Company has adopted long-term emission reduction targets and plans to develop a comprehensive decarbonization strategy in order to limit its climate impact more effectively and pursue its sustainability objectives.
Climate change mitigation – GHG emissions in the value chain (Scope 3)					
Impact: indirect greenhouse gas emissions (Scope 3) resulting from activities in the supply chain, covering the processes of cultivation, extraction and manufacture of materials such as plastics, paper, cosmetic ingredients, transport and export of products. This impact represents a significant challenge but at the same time creates an opportunity to reduce emissions through the use of raw materials from sustainable cultivation, such as palm oil, avocado and coffee.	Negative actual impact	Short-, medium- and long-term	Upstream value chain	At present the Company does not incur additional costs associated with Scope 3 emissions; however, in the future, growing regulatory requirements and stakeholder expectations may entail the need for investments in emissions monitoring, sourcing more sustainable raw materials and cooperation with suppliers on reducing the carbon footprint, which may affect the structure of operating and investment costs.	The Company has begun activities in the area of monitoring greenhouse gas emissions in the supply chain and implementing raw materials from sustainable cultivation, which is intended to limit the negative impact on climate change. At the same time, work is under way on engaging suppliers in the sustainability strategy, which includes the gradual implementation of environmental standards and cooperation on reducing emissions across the entire value chain.

Impact, risk or opportunity (IRO)	Time horizon	Location of the material impact, risk or opportunity	Current and future effects, including financial	Response
ESRS E3 Water and marine resources				
Water consumption				
Impact: water consumption in production processes, both as an ingredient of cosmetics and as process water, which after use does not return to the natural water cycle. High water consumption also occurs at the stage of cultivating plants used to produce cosmetic ingredients, which may affect the availability of water resources in production regions.	Negative actual impact	Short-, medium- and long-term	Own operations and upstream Over the past two years, the Company has incurred investment outlays on technologies for the recovery and reduction of process water consumption at manufacturing plants. In the future, further investments in efficient water management may entail additional operating and investment costs, particularly in the context of increasing environmental regulations and pressure to limit the consumption of natural resources.	The Company monitors water consumption and carries out investments at manufacturing plants aimed at its recovery and efficient use. Responsible water management is one of the priorities within the ISO 14001 system. The Company has no direct influence on water consumption at the raw material cultivation stage, but strives to select suppliers who apply sustainable practices in this area.
Water withdrawal				
Impact: water withdrawal for the needs of technological processes, as an ingredient of cosmetics and for social purposes at manufacturing plants.	Negative actual impact	Short-, medium- and long-term	Own operations At present, water withdrawal is stable and controlled; however, growing environmental requirements and potential changes in the availability of water resources may result in the need for additional investments in water-saving technologies and the optimization of water consumption in production processes.	As above
Wastewater				
Impact: wastewater arising from water use for social purposes and from production processes is discharged into the sewage system or additionally as waste (in accordance with applicable regulations). In addition, the quality of wastewater is affected by consumers' use of cosmetic products, which represents a challenge for wastewater treatment at further stages of its cycle.	Negative actual impact	Short-, medium- and long-term	Own operations and downstream value chain At present, wastewater management does not generate significant operating or investment costs for the Company. In the future, any tightening of environmental regulations may require the adaptation of processes and monitoring of wastewater parameters.	The Company conducts wastewater management in accordance with applicable environmental permits, ensuring the proper discharge of wastewater without direct impact on surface waters. At the same time, it monitors the development of regulations concerning substances contained in cosmetic products and their impact on water and sewage systems.
ESRS E5 Resource use and circular economy				
Resource inflows, including resource use: Cosmetic ingredients				
Impact: adaptation to legal requirements regarding prohibited ingredients, including the withdrawal of microplastics, nano-ingredients and silicones, and the updating of procedures concerning allergens. The Company has implemented safety assessment processes covering the analysis of the composition of cosmetics for compliance with internal lists of excluded ingredients – both those prohibited by law and those eliminated voluntarily. Furthermore, growing consumer interest in natural ingredients creates an opportunity to develop products based on upcycled, biodegradable and certified raw materials.	Positive actual impact	Short-, medium- and long-term	Own operations, upstream and downstream value chain At present, adaptation activities do not generate significant costs; however, in the future, further tightening of regulations and growing consumer requirements may entail the need to reformulate products. The implementation of certified and biodegradable raw materials may affect raw material sourcing costs.	The Company continuously updates its lists of ingredients not permitted in production, monitors regulatory changes and implements raw materials compliant with applicable standards. The safety assessment process ensures the compliance of the composition of cosmetics with the list of excluded ingredients and hazardous substances. At the same time, the Company is developing a portfolio of products based on upcycled, biodegradable and certified raw materials, adapting them to market and sustainability requirements.

Impact, risk or opportunity (IRO)		Time horizon	Location of the material impact, risk or opportunity	Current and future effects, including financial	Response
Resource outflows related to products and services: Packaging					
Impact: use of non-renewable materials, including plastics derived from crude oil, for the production of packaging, and consumption of paper for the needs of product and bulk packaging.	Negative actual impact	Short-, medium- and long-term	Own operations and downstream value chain	New EU regulations concerning the placing of packaging on the market and its ecodesign may entail additional costs resulting from adapting to legal requirements, changes in packaging materials and possible fees for non-ecological packaging.	The Company already has a number of cosmetic lines in more sustainable packaging, including packaging made of mono-materials and suitable for recycling. It is planned to adopt an ecodesign policy and to further inventory packaging in order to increase its compliance with sustainability requirements.
Packaging waste					
Impact: the Company places a significant number of packaging items on the market, of which only a small proportion contains recycled raw materials. Multi-material and other non-recyclable packaging is also used, which may hinder its reprocessing. In addition, improper management of packaging waste by the customer and end user represents a challenge for the circular economy.	Negative actual impact	Short-, medium- and long-term	Own operations and downstream value chain	Current and planned regulations concerning packaging responsibility may result in additional costs associated with its ecodesign, an increase in fees for packaging waste and the need to implement more sustainable solutions. The need to invest in innovative materials and to adapt production processes may affect the structure of operating costs.	The Company implements recycled and biological materials in the packaging of selected product lines, seeking alternatives to non-renewable and non-recyclable raw materials, including certified materials. It participates in the RafCycle program, supporting the recycling of label liners. A process of packaging inventory has been started, together with work on a packaging strategy, in order to increase its compliance with the requirements of the circular economy.
Production waste					
Impact: generation of production and municipal waste at manufacturing plants.	Negative actual impact	Short-, medium- and long-term	Own operations	At present waste management does not generate significant costs; however, in the future the tightening of waste management regulations and rising disposal costs may affect operating expenditure.	The Company has implemented a segregation system and monitors waste management processes at manufacturing plants in accordance with applicable regulations. Activities are undertaken aimed at improving the way waste is stored and minimizing its generation.
ESRS S1 Own workforce					
Work-life balance					
Impact: ensured access to parental leave, flexible working hours, childcare and regulated remote work. The development of the organization may lead to a periodic increase in the number of overtime hours and a disturbance of the work-life balance.	Positive actual impact	Short-, medium- and long-term	Own operations	The financial effects are insignificant and do not require additional planning.	The Company operates in accordance with applicable legal provisions and internal regulations concerning flexible working time and remote work.
Occupational health and safety					
Impact: exposure of employees to hazards associated with pollution, hazardous substances, work at height, moving machine parts and vehicles in motion. Potential risk of accidents at work and their health consequences.	Negative actual impact	Short-, medium- and long-term	Own operations	The financial effects are insignificant and do not require additional planning.	Prevention and regular OHS training in accordance with legal regulations, including workstation training, safe work instructions and single-topic lessons. Use of personal protective equipment and initiatives improving ergonomics and work efficiency, such as automation, job rotation and the possibility of changing from a seated to a standing position.

Impact, risk or opportunity (IRO)		Time horizon	Location of the material impact, risk or opportunity	Current and future effects, including financial	Response
Equal treatment and equal opportunities for all					
Impact: predominance of women in the organization, their presence on the Management Board and the Supervisory Board, and the maintenance of a low pay gap.	Positive actual impact	Short-, medium- and long-term	Own operations	The financial effects are insignificant and do not require additional planning.	Activities in favor of equal opportunities and a transparent remuneration policy, in accordance with internal regulations and ESG standards.
Diversity					
Impact: a workforce that is diverse in terms of gender, age and other aspects, such as origin, religion, sexual preferences or disability. Lack of formal guidelines regarding a policy of diversity and inclusion of employees regardless of their personal characteristics.	Positive actual impact	Short-, medium- and long-term	Own operations	The financial effects are insignificant and do not require additional planning.	Planning of activities in favor of integration and equal treatment of employees, inclusion of diversity principles in internal policies, and the future development of a DEI (Diversity, Equity & Inclusion) strategy.
Training and skills development					
Impact: lack of regular performance reviews and career development paths. Ensuring equal access to training within the available budget, covering OHS, technical skills, language courses, coaching and qualification programs supporting competence development.	Negative actual impact	Short-, medium- and long-term	Own operations	A planned increase in expenditure on employee training and development, which entails additional operating costs but may contribute to improving work efficiency and increasing staff engagement.	Expansion of training programs, introduction of systematic competence assessment and development of a strategy supporting the long-term development of employees.
ESRS S4 Consumers and end-users					
Information-related impacts for consumers and/or end-users: Information on product composition					
Impact: providing consumers with access to full product information, including composition, country of origin, properties, allergens and other markings required by law. Use of appropriate warnings and explanations enabling the safe and correct use of products.	Positive actual impact	Short-, medium- and long-term	Own operations and down-stream value chain	No significant financial effects; adapting labeling to regulations and consumer requirements may entail small operating outlays.	Continuous monitoring of regulations concerning product labeling and ensuring their compliance with legal requirements and consumer expectations.
Personal safety of consumers or end-users: Safety of cosmetics					
Impact: application of product safety assessment procedures, covering mandatory and voluntary laboratory tests (including application tests). Handling of complaints and reports of adverse reactions, and introduction of changes to compositions on the basis of consumer feedback.	Positive actual impact	Short-, medium- and long-term	Own operations and down-stream value chain	No significant financial effects; costs associated with testing and complaint handling are included in ongoing operating activity.	Products are assessed by a person responsible for product safety assessment (safety assessor), and compositions are tested in line with requirements. A system for receiving and considering complaints operates within ISO 9001, ensuring an effective response to consumer reports.

Impact, risk or opportunity (IRO)		Time horizon	Location of the material impact, risk or opportunity	Current and future effects, including financial	Response
Social inclusion of consumers or end-users: Access to products and services					
Impact: ensuring broad access to products through a diversified price offering, availability in various sales channels and a broad portfolio of cosmetics adapted to the needs of different customer groups. In addition, the donation of products supports people in need.	Positive actual impact	Short-, medium- and long-term	Own operations and downstream value chain	No significant financial effects; the diversification of the offering supports market development and product availability without additional operating costs.	Continuous expansion of the product range, price optimization and distribution across various sales channels. Continuation of social activities through the donation of products.
Social inclusion of consumers or end-users: Responsible marketing practices					
Risk: risk of accusations of greenwashing, including consumer lawsuits, resulting from errors in marketing communication concerning environmental and sustainability aspects.	Positive actual impact	Short-, medium- and long-term	Own operations and downstream value chain	Potential costs associated with adapting marketing messages to legal requirements, and the risk of financial penalties and reputational loss in the event of imprecise or misleading messages.	Adaptation of marketing activities to applicable regulations, use of transparent communication based on reliable data, and ongoing monitoring of the compliance of messages with the principles of responsible marketing.
ESRS G1 Business conduct					
Corporate culture: Code of ethics					
Impact: strengthening an ethical culture through the implemented Code of Ethics, setting out standards of conduct within the organization.	Positive actual impact	Short-, medium- and long-term	Own operations and downstream value chain	No significant financial costs.	Implementation of the training plan and activities aimed at disseminating the principles of the Code of Ethics within the organization.
Management of relationships with suppliers, including payment practices					
Impact: sourcing of raw materials from various regions of the world, including risk countries, which entails an indirect impact on environmental matters and human rights in the supply chain. Lack of appropriate ESG provisions in contracts with suppliers.	Positive actual impact	Short-, medium- and long-term	Own operations and upstream value chain	No significant financial effects; the planned activities may affect the structure of purchasing processes.	An operating supplier code, monitoring of the countries of origin of raw materials and of risk countries. Continuation of activities to strengthen cooperation with key suppliers on social and environmental matters. Payments are made in accordance with contractual provisions and issued documents.

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

Description of the methods and assumptions applied in the process of identifying and assessing material impacts, risks and opportunities

Bielenda Group carried out a Double Materiality Assessment in accordance with the ESRS guidelines contained in ESRS 1 and the EFRAG IG 1 “Materiality Assessment” guidance, applying an approach based on current market practices and the principles of due diligence. In line with the adopted reporting boundaries, the analysis concerned own operations conducted in Poland, covering two manufacturing plants located in Kąty Wrocławskie and Radzymin and the head office in Kraków. In addition, an analysis of the value chain was taken into account, from the sourcing of raw materials through to the end of the product life cycle and their recycling.

The analysis focused on assessing ESG matters from two perspectives: impact materiality, understood as the effect of the Company's activity on society and the environment, and financial materiality, defining the impact of ESG factors on the Company's financial results. The aim of the analysis was to ensure the consistency of the identified ESG topics with the Company's strategy, regulatory requirements and stakeholder expectations.

The **DMA** (Double Materiality Assessment) process was structured along the value chain – taking into account both upstream activities, covering suppliers and the sourcing of materials, and downstream activities, i.e. activities related to customers and the end of the product life cycle. This approach made it possible to fully understand the potential risks and opportunities arising from the business environment.

The process was documented, enabling annual updates and continuous improvement as ESG management systems evolve. The assessment comprised four main stages, designed to provide a comprehensive analysis of material impacts, risks and opportunities associated with ESG factors:

1. understanding the context and developing a stakeholder engagement strategy,
2. identifying potentially material sustainability matters, impacts, risks and opportunities,
3. assessing materiality,
4. summarising the process and approving the results.

Throughout the process a combination of quantitative and qualitative approaches was applied, covering the analysis of historical data, industry benchmarking and broad stakeholder engagement.

The assumptions adopted, described in detail later in this chapter, include:

- ✓ analysis of Bielenda Group with its headquarters in Kraków and manufacturing facilities in Poland, taking into account the entire value chain,
- ✓ application of a quantitative method for identifying key stakeholders (described below),
- ✓ definition of the time horizon,

- ✓ both qualitative and quantitative criteria for assessing materiality,
- ✓ comparative analysis and stakeholder opinions as elements supporting the Company's assessment,
- ✓ involvement of a representative of the Management Board – the Vice-President of the Management Board for Finance and Strategy Implementation, responsible for making key decisions,
- ✓ the process was documented in an Excel file and in the form of notes and partial conclusions (e.g. the results of the comparative analysis).



Impact materiality

The assessment of impact materiality covered four main criteria:



Scale of the impact

Defines the extent of the changes that the impact may cause (e.g. on the environment, community, economy); assessed on a scale from 1 (minimal impact) to 5 (very high impact)



Scope of the impact

Refers to the number and diversity of entities and areas affected by a given event; assessed on a scale from 1 (local) to 5 (international); in the social context the scope covered the percentage of persons or locations affected by a given impact



Irremediable character

Assesses the possibility of reversing the effects of the impact; the scale covered levels from 1 (easy to remedy) to 5 (irreversible)



Likelihood of the impact occurring

Defines the probability of the actual occurrence of the impacts; assessed on a scale from 1 (very low probability) to 5 (very high probability)

Four types of impact were analyzed:

1

**Actual
negative
impact**

2

**Potential
negative
impact**

3

**Actual
positive impact**

4

**Potential
positive impact**

For each of these types, weights were assigned to the individual criteria. For example, for actual negative impacts, the greatest weight was allocated to the scale of the impact (40%), while for actual positive impacts the scale and the scope of the impact were weighted equally (50% each).

Financial materiality

In the assessment of financial materiality, a qualitative analysis of ESG-related risks and opportunities was applied, based – where possible – on Bielenda Group's historical data. The potential impact of these factors on the Company's financial results in the short, medium and long term was assessed, taking into account both negative and positive effects. The criteria assessed included:

1. Impact on the budget (weight 70%)

Assessment of the ESG impact on the company's operating budget and financial result. Rating scale (1–5):

- ✔ 1 – minimal impact, barely noticeable in the budget,
- ✔ 5 – very large impact, potentially leading to financial destabilization.

In the case of positive financial effects, their ability to generate savings, increase revenue and expansion opportunities was assessed. The highest rating (5) meant significant financial benefits, such as a considerable improvement in financial stability, further development and gaining a leadership position on the market.

2. Likelihood of the impact occurring (weight 30%)

Opportunities and threats associated with ESG were assessed on a scale from 1 (very low) to 5 (very high), both for risks and for positive ESG-related opportunities.

Approach to calculations

The final ESG ratings were calculated on the basis of a weighted average, in accordance with the weights of the individual criteria.

Materiality threshold

ESG topics were considered material for the company if, as a result of the assessment, they obtained an average rating between 3.8 and 5. Topics with a rating from 2.1 to 3.7 were considered moderately material, while those below 2 were considered not material. The adopted assessment criteria and the materiality threshold were discussed with the team and adopted by the CFO of Bielenda Group.

Time horizon

The time horizon of the analysis covers three perspectives:

- ✔ short-term (up to 1 year), focusing on immediate risks and operational changes;
- ✔ medium-term (from 1 to 5 years), taking into account changing regulations, market and technological trends;
- ✔ long-term (over 5 years), focused on future sustainability trends and their potential to transform the industry.

In order to identify the most important stakeholders, Bielenda Group conducted a survey among managerial staff, in which

25 people took part.

Identification of key stakeholders

Based on the responses received, key stakeholder groups were identified. The conclusions of the comparative analysis and the opinions of stakeholders had a supporting character in the process of assessing individual impacts, risks and opportunities. The results of these two analysis were not mathematically included in the assessment carried out.

The entire process, including the steps performed, stakeholder prioritization, comparative analysis, conclusions from stakeholder opinions and the assessment of individual impacts, risks and opportunities, was documented in an Excel tool.

Overview of the process of identifying, assessing, prioritizing and monitoring impacts

The analysis focused on the Company's activity in Poland and covered the manufacturing plants in Kąty Wrocławskie and Radzymin as well as the facility with office space and technology laboratories in Kraków. Within its scope, the management systems in force, current processes, permits held, system reviews and corrective actions together with the status of their implementation were assessed. In parallel, data concerning individual identified ESG topics were collected and analyzed.

The process based on the Double Materiality Assessment took into account key business relationships across the entire value chain – with contractors, suppliers and subcontractors. Available information on the impact of the cosmetics industry on various ESG areas was used. The analysis also covered future regulatory changes that may affect the scale of impacts, risks and opportunities material for Bielenda Group and its value chain partners.

Key stakeholders affected by the Company's activities were engaged in the process to better understand their expectations and potential operational impacts. Consultations were carried out with employees, suppliers, customers and investors through surveys, workshops and expert interviews. The information collected was used to prepare a comprehensive list of impacts, risks and opportunities and supported the final assessment.

Process of identifying and assessing risks and opportunities

The Company carried out the identification and analysis of risks and opportunities associated with sustainable development, taking into account their links with impacts and dependencies arising from the activity conducted. The assessment of the likelihood and scale of the effects of risks and opportunities was made in accordance with ESRS 1 and the adopted assessment criteria (taking into account, as supporting material: the results of the comparative analysis, stakeholder opinions and source documents). The assessment was made by an internal team consisting of Bielenda Group experts from departments such as: R&D, marketing, HR, purchasing, production, environmental protection, complaint handling, management systems, and the leaders of the manufacturing plants. This was an expert assessment, based on knowledge and experience gained in the cosmetics industry.

To ensure the appropriate prioritization of ESG risks relative to other risk categories, the Company considered the risks identified within the ISO management systems it has in place. The Company does not have a comprehensive corporate risk management system and therefore did not undertake activities related to the application of additional tools and assessment criteria within the Double Materiality Assessment framework.

Decision-making process and internal control procedures

Decisions concerning the materiality of ESG topics were made with the participation of:

- the **ESG Committee** (Bielenda Group experts from departments including: R&D, marketing, HR, purchasing, production, environmental protection, complaint handling, management systems, and the leaders of the manufacturing plants),

- a **representative of the Management Board** – the Vice-President of the Management Board for Finance and Strategy Implementation,

- the **ESG Manager**.

The Management Board member was involved and made decisions on:

- the composition of the project team,
- the assessment criteria adopted, the time horizons and the materiality thresholds,
- the review of the list of impacts, risks and opportunities together with the assigned ratings and the comparison of results with the conclusions from stakeholder engagement and the results of the comparative analysis,
- the approval of the final results of the analysis.

The results of the Double Materiality Assessment were discussed and accepted by the Management Board and the Supervisory Board. Internal control procedures include the periodic verification of the materiality analysis process and its updating following changing regulations and the business environment.

Integration of the analysis of impacts and risks with the risk management process

The results of the Double Materiality Assessment were not incorporated into the Company's general risk management process due to the absence of such a system. Action in this respect will be taken once the Company's approach to corporate risk management has been structured.

Integration of the analysis of opportunities into the management process

The identification and assessment of ESG opportunities has been integrated into the Company's strategic ESG management process. Based on the results of the Double Materiality Assessment, it was updated with a perspective to 2030 and 2050. The teams responsible for managing the identified impacts, risks and opportunities are also responsible for the achievement of the strategic ESG objectives.

Input parameters used in the analysis

The Company used a variety of data sources, including:

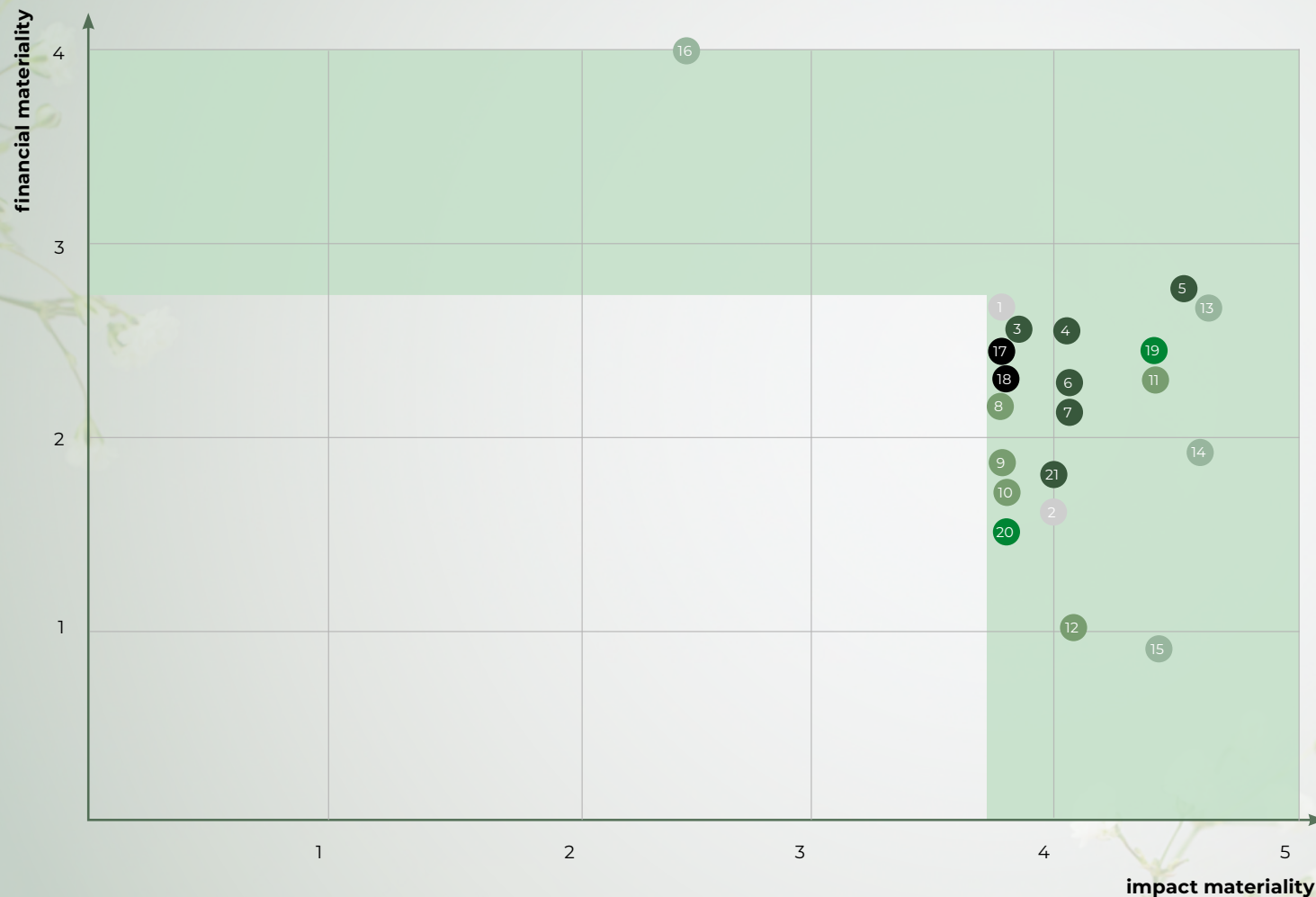
- policies, codes, documentation of ISO and other management systems, permits,
- operational data concerning individual ESG topics,
- results of surveys and interviews with stakeholders,
- industry benchmarking,
- regulatory and market forecasts.

The scope of operations covered by the analysis included both the Company's own manufacturing plants and key business relationships in the value chain.

Changes in the process compared with the previous period

In 2024 Bielenda Group carried out a Double Materiality Assessment for the first time. The next analysis is planned for 2026.

RESULTS OF THE DOUBLE MATERIALITY ASSESSMENT



- 1 Water consumption (own operations and value chain)
- 2 Water withdrawal (own operations)
- 3 Sustainable cosmetic ingredients
- 4 Circular economy in packaging
- 5 Cosmetic ingredients
- 6 Virgin (plastic packaging)
- 7 Paper packaging
- 8 Diversity
- 9 Work-life balance
- 10 Training and skills development
- 11 Gender equality and equal pay for work of equal value
- 12 Occupational health and safety
- 13 Information on product composition
- 14 Access to products and services
- 15 Safety of cosmetics
- 16 Responsible marketing practices
- 17 Greenhouse gas emissions from own operations
- 18 Greenhouse gas emissions in the value chain
- 19 Cooperation with suppliers
- 20 Code of ethics
- 21 Safe cosmetic compositions

Summary

The Double Materiality Assessment at Bielenda Group constitutes a key element of the Company's ESG strategy, supporting informed decision-making in the management of social, environmental and financial impacts. Systematic review and updating of the process allow the Company to flexibly adapt its activities to the changing regulatory and market environment.

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

In the activities of Bielenda Group no material **negative impacts associated with the emission of pollutants** into air, water or soil were identified. Production processes are conducted in accordance with applicable legal provisions and are subject to regular environmental inspections. The **scale of pollutant emissions is limited, and the technologies and treatment systems applied minimize environmental risk**. Consequently, the topic was not considered material from the point of view of environmental impact or of financial risks arising from possible sanctions or remediation costs.



ESRS E4 – Biodiversity and ecosystems

For Bielenda Group, biodiversity is significant from the perspective of the responsible sourcing of plant raw materials for the production of cosmetics. The company initiates activities in cooperation with suppliers in order to better understand the impact of the value chain on ecosystems. At the current stage of the Company's development, however, this impact has not assumed a scale, scope or irreversible character that would justify recognizing it as material, following the definition in ESRS. The topic also does not carry material financial risks – the assessment indicates medium impact materiality and low financial materiality.



ESRS S2 – Workers in the value chain

Bielenda Group recognizes its indirect impact on working conditions in the supply chain. However, the scale of subcontracted production is small, and cooperation is based mainly on long-standing, established relationships with local partners. Consequently, the risk of human rights violations and unethical employment practices was assessed as low. The company implements due diligence and supplier management policies; however, in the current reporting cycle this topic was not considered material.



ESRS S3 – Affected communities

The Company's operating activity does not involve a direct, systematic impact on local communities in the places where it conducts its business. The Company operates in an established urban and industrial environment, and the scale of its operations does not generate social risks or tensions with local communities. Social activities are voluntary and supportive in nature rather than remedial. Accordingly this topic was not qualified as material.



Forward-looking statement

In the coming years, we intend to continue the **transformation toward climate neutrality**, in accordance with the assumptions of the ESG strategy. Our objective is to reduce greenhouse gas emissions in Scopes 1 and 2 by 55% by 2030 (compared with the 2021 level). In 2025, aligned with the established objectives set, we built a decarbonization strategy for Scopes 1 and 2 and began collecting the data necessary to calculate Scope 3 carbon footprint emissions.

We consistently undertake activities aimed at the use of **renewable energy sources** at our manufacturing plants. We are analysing the installation of photovoltaic panels, among others at the warehouse hall in Dąbrówka Wielka near Łódź and at the current manufacturing plants. The projects are currently under analysis. In parallel, we are developing investments in **energy efficiency** – we are implementing heat recovery systems and modern, energy-saving technological solutions.

In the area of products we consistently reduce our environmental impact:

We plan to ensure that by 2030 as much as

99%

of the raw materials in our products will be free from microplastics.

At the same time we want

100%

of ingredients to be free from harmful nanomaterials.

By 2030, we aim for

100%

of our products also to be free from cyclic silicones.

In 2025 we created and introduced the **Ecodesign Code**, together with a packaging management tool. These activities are intended to increase the recycled content of packaging **to more than 65% by 2050**.

In line with our approach to social responsibility, we want **100% of strategic suppliers to be covered by the Supplier Code as early as 2030**. We also strive to maintain a **high level of employee engagement** – both in volunteering activities and in the competence development system, covering every employee with an individual assessment and development path.

We treat ESG management at the strategic level as an integral part of our operating model – ESG indicators are regularly discussed at meetings of the Management Board and the Supervisory Board, and our objective is to achieve the **EcoVadis Gold Medal by 2030**.

The forward-looking information contained in this report reflects our current assumptions and plans. Owing to changing market, regulatory and technological conditions, actual results may differ from the projections presented. This report has been compiled using the data and information available to the Company at the time of its preparation.



Reporting framework and approach

BP-1 – General basis for preparation of the sustainability statement

This Bielenda Group sustainability statement has been prepared on the basis of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting, as well as Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards. This statement is the second report prepared following the CSRD Directive and the ESRS guidelines.

The Company's financial year is the calendar year, and this statement covers the financial year ended 31 December 2025. Details of the entities covered by the consolidated financial statements of Bielenda Group are presented in the explanatory note to the financial statements and are consistent with this sustainability statement. The Company is registered in the National Court Register of the District Court in Kraków, maintained for Kraków-Śródmieście, 11th Commercial Division of the National Court Register, under KRS number 0000982226.

The parent entity in relation to the Company is Innova Central Holding SCA (Innova Capital), and the ultimate parent entity is Innova/6 SICAV RAIF, managed by the general partner Innova/6 GP, which is indirectly controlled by natural persons – the owners of Innova/6 Carry SCSP. These companies have their registered office in Luxembourg. Sustainability statements are not prepared at the highest level. The fund prepares its sustainability report separately.

In preparing the statement, Bielenda Group did not make use of the option to omit information concerning intellectual property, know-how or the results of innovation.

AI Usage Disclaimer

In preparing this report, artificial intelligence (AI) tools were used to create selected graphic materials. All data, KPIs, and substantive content have been reviewed and verified by the Company's team. Any visuals generated using AI are intended solely for illustrative purposes.

This sustainability statement was approved for publication by the Company's Management Board.

BP-2 – Disclosures in relation to specific circumstances

This is the second sustainability statement prepared by Bielenda Group based on the CSRD, and therefore most indicators can be compared with the previous year. Some data required updating and are consistent with our best knowledge as at the date of preparation of the statement.

All quantitative data were taken from internal tools used for data management, and calculations were performed with the necessary care. In some cases, owing to a lack of data or inaccuracies, estimated data were adopted.

In preparing this statement, the Company refers to information contained in the relevant parts of the document.

In this statement, Bielenda Group has made use of the option of phased-in disclosures, set out in Appendix C to the ESRS1 standard. The current report does not include taxonomy disclosures in accordance with Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, amending Regulation (EU) 2019/2088. The value chain is described in more detail in SBM-1.



Incorporation by reference

Required disclosure	The reference is present in the sub-section:
SBM-1 – Strategy, business model and value chain	Bielenda Group Strategy
BP-2 – Disclosures in relation to specific circumstances	Described more broadly under SBM-1 – Strategy, business model and value chain
E3-1 – Policies related to water and marine resources	E1-2 – Policies related to climate change mitigation and adaptation
E5-1 – Policies related to resource use and circular economy	E1-2 – Policies related to climate change mitigation and adaptation
S1-1 – Policies related to own workforce	G1-1 – Business conduct policies and corporate culture
S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	G1-1 – Business conduct policies and corporate culture
S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	S1-1 – Policies related to own workforce
S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	S1-2 – Processes for engaging with own workforce and workers' representatives about impacts
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	S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns
S4-1 – Policies related to consumers and end-users	G1-1 – Business conduct policies and corporate culture

Use of phased-in provisions in accordance with Appendix C to ESRS 1

ESRS DR	Disclosure
E1-6	Gross Scope 3 greenhouse gas emissions
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
E3-5	Anticipated financial effects from water and marine resources-related risks and opportunities
E5-6	Anticipated financial effects from resource use and circular economy-related risks and opportunities
S1-13	Training and skills development – phased-in disclosure of training hours



ENVIRONMENT

Responsibility for the environment is not an addition to our activity, but an integral part of it. We believe that progress makes sense only when it goes hand in hand with care for nature. That is why we want to grow in a way that allows beauty to exist in harmony with the planet from which we draw inspiration.



In 2025, the Company developed a Strategy for reducing greenhouse gas emissions in Scopes 1 and 2, in accordance with the GHG Protocol methodology and based on the objectives of the Paris Agreement. The Strategy sets out a decarbonization pathway assuming an average annual emission reduction of 4.2%, in order to align operating activity with long-term climate objectives.

The process of developing the Strategy included the identification and analysis of potential reduction initiatives, the estimation of their impact on the level of emissions (the decarbonization effect), and the assessment of the technical feasibility and economic efficiency of the planned investments. On this basis, implementation priorities and a schedule for carrying out the activities were established.

Greenhouse gas emissions are one of the key areas of Bielenda Group's environmental impact. The sources of emissions are the consumption of fuels and energy at manufacturing plants (direct and indirect emissions – Scopes 1 and 2), as well as activity across the entire value chain (Scope 3), covering the production of raw materials and packaging, logistics processes and the use of products by end customers.

Over the last few years the company has **undertaken a number of activities aimed at limiting emissions**, among others through investments in improving energy efficiency (e.g. modernization of lighting or heat recovery).

In the long-term perspective Bielenda Group aims to reduce greenhouse gas emissions by

55%

by 2030 relative to the 2021 level, and to achieve climate neutrality in Scopes 1 and 2 by 2050, in line with the market-based methodology.

Risks associated with climate change were taken into account in the Double Materiality Assessment, although detailed climate scenarios have not yet been developed.

In the years 2021–2025 the Group achieved a reduction in greenhouse gas emissions in Scopes 1 and 2 (market-based method) of

25%

while revenue simultaneously increased.

E1.GOV-3 – Integration of sustainability-related performance in incentive schemes

Selected ESG objectives – including the decarbonization plan for Scopes 1 and 2 – have been included in incentive schemes for selected members of the Management Board, thereby supporting the implementation of Bielenda Group's long-term climate strategy.

Management of climate-related impacts, risks and opportunities is based both on **current activities** conducted within the environmental policy and on the newly **created Strategy for reducing the carbon footprint in Scopes 1 and 2**.

E1-1 – Transition plan for climate change mitigation

Bielenda Group monitors greenhouse gas emissions and is at the stage of verifying specific investments that will be feasible within the decarbonization process. Despite the absence of a formally adopted plan for transition to a low-emission economy, technological and organizational solutions are already being implemented today which fit into the **activities aimed at reducing the enterprise's carbon footprint**.

E1.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model; E1.IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities

Bielenda Group identifies and assesses impacts, risks and opportunities associated with climate change within the Double Materiality Assessment conducted and through the monitoring of greenhouse gas emissions.

The Company currently focuses on monitoring emissions in Scopes 1 and 2, in accordance with the requirements of ESRS E1-6, and has begun collecting data for the calculation of Scope 3 carbon footprint

emissions. Within the Double Materiality Assessment carried out, both physical and transition risks arising from climate change were taken into account. The scope of this analysis was, however, limited to a basic level – it did not cover a detailed review of the impact of climate change on the Company's strategy or business model.

To date, no comprehensive assessment of the resilience of the business model to climate risks has been carried out, nor any scenario analysis that would take into account the possible effects of climate

change on operating activity, the supply chain and development directions over a long time horizon.

The activities undertaken focused primarily on identifying general threats and opportunities in the climate context. Bielenda Group plans to develop its approach to climate risk management, broadening the analysis with more detailed aspects and adapting to growing regulatory requirements and market best practices.

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

All activities currently carried out result from the implementation of the framework guidelines presented within the Environmental Policy. At present the organization does not have policies for individual matters associated with climate change, because the implementation of investment activities associated with decarbonization is embedded in the ISO 14001 management processes.

Policies related to climate change mitigation and adaptation

Policy name	Description	Scope	Responsibility
Bielenda Group Environmental Policy	The main objective of the policy is to limit the organization's negative impact on the environment. The document addresses material topics such as: - climate change mitigation, - rational use of fuels, energy and water, - modernization of technology in order to improve environmental performance, - sustainable management of resources, - support for the circular economy, - other areas defined within the remaining ESRS standards. The policy has been in force since September 2024 and is updated every 2 years or as needed. It refers to: - national regulations, - the guidelines of the ISO 14001 standard concerning the international environmental management standard, - the UN Sustainable Development Goals. The policy is generally available to employees – published on internal information boards.	Our Environmental Policy focuses on complying with applicable environmental protection regulations and on the continuous reduction of the negative impact of our activity on our surroundings. In accordance with its provisions: - we strive for the rational use of resources such as raw materials, energy and water, - we implement technologies that limit emissions and the amount of waste generated, - we carry out modernization of the machinery park in order to optimize the consumption of energy and raw materials, - we carry out activities in the area of waste management and of education and building environmental awareness among employees. In order to effectively implement the policy we engage both employees and suppliers, jointly creating the foundations of sustainable development.	The person responsible for the policy is the Head of ESG. All employees are responsible for implementing the policy's objectives.
Ecodesign Code	Described more broadly in G1-I.		

E1-3 – Actions and resources in relation to climate policy

Activities to improve energy efficiency and decarbonization

Bielenda Group systematically implements a number of initiatives limiting the consumption of individual utilities, which significantly support the implementation of the company's climate strategy. The list of activities mainly includes those focused on eliminating losses and associated with improving energy efficiency, as well as new investments.

Bielenda Group cooperates continuously with logistics operators that implement solutions **limiting CO₂ emissions**, and also regularly conducts cyclical **energy efficiency audits** in compliance with applicable regulations.

Year	Area	Action	Operational effect	Location
2024	HVAC	Free Cooling modernization	Reduction of energy consumption by 45 MWh	Radzymin
2024	Lighting	Lighting modernization	Reduction of energy consumption by 40 MWh	Radzymin and Kąty Wrocławskie
2024	Heating	Installation of heat pumps	Reduction of gas consumption by 20%	Radzymin
2024	Heat recovery	Heat recovery system from the compressor room	25 MWh savings/location	Radzymin and Kąty Wrocławskie
2024	Insulation	Insulation of steam pipes	Reduction of energy losses	Radzymin
2024	Energy recovery	Recovery of energy from hot condensate water, used to supply steam generators	Reduction of the energy intensity of the process	Kąty Wrocławskie
2024	Compressed air	Replacement of the compressor with a more efficient one	Lower energy consumption	Kąty Wrocławskie
2025	Ventilation	Optimization of air handling units	Automation of operating time and flow, lower energy consumption	Radzymin
2025	Cooling	Automation of chiller control	Optimal operation of pumps and operating time, lower energy consumption	Radzymin
2025	Steam	Optimization of steam generators	Better process efficiency	Radzymin
2025	Heating	Optimization of central heating and domestic hot water boilers	Stabilization of energy consumption	Radzymin
2025	Lighting	Correction of site lighting settings	Reduction of energy consumption	Radzymin
2025	Compressed air	Sealing of the system	Lower energy losses	Radzymin and Kąty Wrocławskie
2025	Water	Sealing of the utility water installation and replacement of aerators	Reduction of water consumption	Radzymin and Kąty Wrocławskie
2025	Air conditioning	Adjustment of air conditioning	Reduction of energy consumption	Radzymin and Kąty Wrocławskie



In the last quarter of 2025, the Company commenced operations at operations a new central warehouse located in Dąbrówka Wielka near Łódź. The launch of the facility is an element of optimization activities in the area of logistics and supply chain management.

The purpose of the investment was, among other things, to reduce the number of transports of finished products between the Company's individual production locations, which translates into increased operational efficiency and a reduction in emissions associated with transport.

An additional advantage of the warehouse's location is its immediate proximity to one of the Company's key customers. As a result, it is possible to significantly reduce transport distances in the product distribution process, which contributes both to improving logistics efficiency and to reducing the carbon footprint in the area of transport.

The facility was designed with a view to obtaining **BREEAM certification at the Excellent level**, confirming the building's high environmental performance. The warehouse infrastructure allows to partially replace the combustion-engine fleet with an electric one – charging stations with the following capacities have appeared on site: 50 kW DC, 22 kW AC and two of 11 kW AC. Parking spaces have also been designated for a **car-sharing system**, constituting at least 5% of the available parking area. Amenities include, among others, **bicycle shelters, air curtains, tilting windows, and the use of blinds and glazing minimizing the risk of overheating of office spaces**. The application of these solutions supports the achievement of the Bielenda Group's environmental objectives and its pursuit of minimizing the operational impact on the environment.



Bielenda's central warehouse (Łódź Voivodeship)

Activities in the enterprise's value chain

Bielenda Group conducts activities aimed at better understanding the level of ESG maturity of its suppliers. The analysis carried out revealed significant variation in the level of advancement in the area of environmental, energy and emissions management. These differences directly affect the possibility of reliably estimating Scope 3 emissions.

The results of the survey constitute a starting point for building a systemic approach to managing climate impact across the entire supply chain.

Since 2024, the Company has conducted an **ESG survey** covering key environmental, social and governance matters, which was sent to all suppliers. The results of the answers to questions related to climate action are presented below. The results concerning responsibility in the supply chain are presented in chapter G1-2.

Calculating the carbon footprint remains one of the greatest challenges across the entire supply chain. Although companies implementing initiatives in this area predominate among key suppliers, further support is needed to improve the transparency of emissions data (especially for Scopes 1 and 2), resulting, among other things, from regulatory requirements.

1. Environmental management system

The results of the survey of strategic suppliers regarding environmental management indicate significant variation in the level of maturity in this area:

- **36%** have an implemented environmental management system
- **64%** do not have such a system

2. Energy management system (ISO 50001)

The results of the survey regarding energy management among strategic suppliers show a low level of implementation of systemic solutions:

- **17%** have an implemented energy management system
- **83%** do not have such a system

3. Quality management system (ISO 9001)

Among strategic suppliers:

- **86%** have an implemented quality management system
- **14%** do not have such a system

4. ESG strategy

Among key suppliers:

- **58%** have an implemented ESG strategy
- **42%** do not have such a strategy

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

Scopes 1 and 2

Bielenda Group, aware of the impact of its activities on climate change and of the obligations arising from the EU sustainability framework, established in 2024 a medium-term target to reduce greenhouse gas emissions in Scopes 1 and 2 by 55% by 2030 relative to the 2021 base year, applying the market-based method. **The long-term objective is to achieve climate neutrality (Net Zero) by 2050.** In 2025 the Company developed a comprehensive Strategy for reducing the carbon footprint in Scopes 1 and 2, consistent with the requirements of ESRS E1 – Climate Change and based on the internationally recognized GHG Protocol methodology. This document was prepared in a manner aligned with the assumptions of the Paris Agreement, particularly the objective to limit global warming to 1.5°C and reduce emissions by 4.2% annually.

The Strategy comprises a set of decarbonization activities directed both at reducing primary emissions and at minimizing residual emissions. The key areas of intervention include:

- development and installation of renewable energy sources (RES),
- thermal modernization projects improving the energy efficiency of infrastructure,
- implementation of heat recovery systems in technological processes,
- gradual replacement of the vehicle fleet with models with a lower carbon footprint.

Residual emissions remaining after the implementation of reduction measures are planned to be balanced through the use of PPAs (Power Purchase Agreements) or guarantees of origin of energy from RES, depending on the market opportunities available in a given period. All potential investments were subjected to detailed analysis, covering the assessment of energy efficiency, emission reduction potential and analysis. The year 2024 was designated as the base year.

Progress in achieving the target is monitored on the basis of annual emission indicators expressed in tonnes of CO₂e, related to individual energy consumption. The year 2021 constitutes the starting point for calculating emissions.

In 2022, at the manufacturing plant in Kąty Wrocławskie, the Climate Strategies Poland Foundation performed calculations in accordance with the principles of the GHG Protocol – A Corporate Accounting and Reporting Standard, revised edition, March 2004, developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD). The analysis covers emissions in Scopes 1 and 2 and concerns data for 2021. In subsequent years, emissions monitoring and calculations were carried out on the same basis. In 2024 measurements were extended also to new companies belonging to Bielenda Group.

The company is currently analysing decarbonization lever options, including the purchase of electricity from renewable sources under Power Purchase Agreements (PPAs), investments in improving energy efficiency, and the development of its own RES installations.

Scope 3

In 2025, Bielenda Group began the process of identifying and collecting the data necessary to calculate Scope 3 emissions. In the future, this activity will be the basis for setting a target for indirect emissions across the entire chain as well.

E1-5 – Energy consumption and mix

Bielenda Group monitors the consumption of primary and secondary energy, analysing both consumption volumes and the structure of energy sources. This data allows to assess the intensity of energy consumption in operating activity in the cosmetics sector. This information is also important in the context of Bielenda Group's planned decarbonization and energy transformation activities.

Energy consumption and energy mix	2025
1. Fuel consumption from coal and coal products (MWh)	0
2. Fuel consumption from crude oil and petroleum products (MWh), including diesel, petrol, LPG, heating oil	3,180
3. Fuel consumption from natural gas (MWh)	2,434
4. Fuel consumption from other fossil sources (MWh)	0
5. Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	2,781
6. Total fossil energy consumption (MWh) (calculated as the sum of rows 1–5)	8,395
Share of fossil sources in total energy consumption (%)	100%
7. Consumption of energy from nuclear sources (MWh)	0
8. Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (MWh)	0
9. Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	0
10. Consumption of self-generated non-fuel renewable energy (MWh)	0
11. Total renewable and low-carbon energy consumption (MWh) (calculated as the sum of rows 8–10)	0
Share of renewable sources in total energy consumption (%)	0%
Total energy consumption (MWh) (calculated as the sum of rows 6, 7 and 11)	8,395

In 2025, total primary and secondary energy consumption came exclusively from fossil fuels and grid electricity. No use of energy from other sources was recorded, such as:

- renewable energy sources (no purchased RES energy, no own RES generation),
- nuclear energy,
- biomass.

The intensity of electricity consumption in 2025 amounted to **5.12 MWh/million**, and of total energy consumption – **15.6 MWh/million**. The indicators were calculated on the basis of data on energy consumption and net revenue disclosed in the financial statements.

E1-6 – Gross Scopes 1, 2 and 3 greenhouse gas emissions and total greenhouse gas emissions

Bielenda Group monitors and reports greenhouse gas emissions in Scopes 1 and 2 in accordance with the GHG Protocol methodology, applying two calculation variants: the market-based method

Parameters	Emission			Change		Target	
	Base year 2021	Previous year 2024	2025	Change % 2025/2021	Change % 2025/2024	2030	2050
Scope 1	1,531	1,222	1,319	-14%	8%	Scope 1 + Scope 2 = market-based method: -55% vs. base year 2021	Scope 1 + Scope 2, market-based method: -100% vs. base year 2021
of which: stationary combustion	1,048	886	999	-5%	13%		
of which: mobile combustion	483	336	320	-34%	-5%		
of which: process emissions	0	0	0	0%	0%		
of which: fugitive emissions	0	0	0	0%	0%		
Scope 2 – location-based method	1,964	1,563	1,530	-22%	-2%		
Scope 2 – market-based method	1,797	1,389	1,173	-35%	-16%		
Total Scope1 + 2 – location-based method	3,495	2,785	2,849	-18%	2%		
Total Scope 1 + 2 – market-based method	3,328	2,611	2,492	-25%	-5%		

and the location-based method. The data cover all manufacturing plants and offices in Poland. They constitute the basis for assessing emission efficiency and planning reduction activities.

We do not currently carry out Scope 3 emissions calculations for the organization.

Despite the increase in total emissions in 2025 (under the location-based method) of 2% relative to 2024, it should be emphasized that the market-based method, considered more reliable from the perspective of actual costs and purchasing decisions, shows a consistent downward trend.

In 2025, total emissions calculated using the market-based method amounted to **2,492 t CO₂e**, which means a decrease of:

- 5% relative to 2024,
- 25% relative to the 2021 base year.

The increase in emissions under the location-based method results mainly from the local energy mix – a factor over which Bielenda Group has no direct influence. Nevertheless, **the total level of emissions under this approach still remains lower than in 2021** (a decrease of 18%).

In the analyzed period, the largest share of total emissions (under the market-based method) was accounted for by electricity (Scope 2), representing 47% of the organization's total carbon footprint.



Calculations are based on actual data obtained directly from Bielenda Group.

Bielenda Group's activity is not subject to the reporting obligation under the EU ETS system.

The reported greenhouse gas emissions cover:

- ✔ **Scope 1:** direct emissions from own sources, including from the combustion of natural gas, heating oil, petrol, diesel, LPG, energy consumed by electric vehicles, and leakage of refrigerants such as R410A, R407C.
- ✔ **Scope 2:** indirect emissions associated with the purchase of electricity, reported in two variants, i.e. under the location-based method – using the average national emission factor (KOBIZE) – and under the market-based method – using the actual fuel structure of suppliers (PGE, Tauron, Fortum). Emissions associated with the purchase of useful heat are reported in accordance with the location-based method using the factor published by the Energy Regulatory Office (URE).

Emissions were expressed in metric tons of CO₂e. IPCC, DEFRA, NIR, KOBIZE and URE factors were applied. There are no biogenic emissions in the Company, such as those arising from the combustion or biodegradation of biomass.

Our calculations take into account emissions of CO₂, CH₄, N₂O, HFCs, PFCs, SF₆ and NF₃. The calculations include the current values of IPCC factors consistent with the fifth edition.

E1-7 – GHG removals and GHG mitigation projects financed through carbon credits

Bielenda Group does not currently conduct activities associated with the removal and storage of greenhouse gases, nor does it apply emission compensation mechanisms using carbon credits.

The Company has not implemented carbon dioxide sequestration projects or methods of storing greenhouse gases within its operating activity or value chain. Nor does it use CO₂ emission units from outside the value chain in order to neutralize its own emissions.

E1-8 – Internal carbon pricing

Bielenda Group does not apply internal carbon pricing systems, such as a threshold price or an internal carbon fee. The Company does not have a mechanism for assigning a financial value to GHG emissions in its operations or in the value chain. At present, emissions are gradually taken into account when making investment decisions, in strategic planning and in the assessment of reduction projects.

E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

For disclosure requirement E1-9, the Company made use of the transitional provisions. At present, calculations of the anticipated financial effects arising from material physical risks, transition risks or climate-related opportunities have not been performed.



ESRS E3 – WATER AND MARINE RESOURCES

Access to clean water and responsible management of its resources is one of the key environmental challenges of the contemporary world. In the cosmetics sector, where water is both an ingredient of formulations and an indispensable element of technological processes, the conscious management of this resource is particularly important. Bielenda Group sees water not only as a raw material, but as a resource requiring protection, rationalization of consumption and the limitation of secondary emissions – including wastewater containing ingredients that may affect the aquatic environment.

In accordance with the requirements of the ESRS E3 standard, an analysis of the Company's direct and indirect impacts on water resources was carried out. Areas material from the point of view of efficiency and resilience to changing climatic and regulatory conditions were identified. Although the manufacturing plants are not located in areas of high water stress, the Company undertakes specific activities toward:

- ✔ limiting water consumption in production processes,
- ✔ introducing cosmetic formulations that do not require rinsing,

- ✔ the gradual phasing out of raw materials burdening the aquatic environment, such as microplastics, nanomaterials and cyclic silicones; the recovery of rainwater in order to reduce water consumption when irrigating green areas at the plant in Kąty Wrocławskie.

This section contains an overview of the impacts, risks and opportunities associated with water management, as well as a description of the initiatives undertaken and the policies and activities implemented by the Company within its sustainability strategy. Areas of planned investment are also indicated, together with an analysis of the possibility of implementing them in response to upcoming regulations and stakeholder expectations.

ESRS 2 IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

Bielenda Group has not to date conducted separate analyses of risks and opportunities associated with water and marine resources beyond the assessments arising from the environmental permits in force. A review of the hydrological situation was, however, carried out at the locations of the manufacturing plants, which confirmed the absence of areas of high water stress and

established a moderate level of hydrological and hydrogeological drought risk (class II) for the units located in Kąty Wrocławskie and Radzymin, and a low level for the Central Warehouse located in Dąbrówka Wielka (on the basis of data from the National IT System for Country Protection – Hydroportal).

Activities to date have not included consultations with local communities regarding the impact of the Company's activity on local water resources. Despite this, material impacts associated with water were identified both within own activity and in the value chain. They cover water consumption and withdrawal and the generation of wastewater. Detailed information concerning the nature of these impacts, the associated risks and the activities undertaken by the Company is presented later in this section.

E3-1 – Policies related to water and marine resources

Water resource management at Bielenda Group is based on the assessment of local hydrological conditions and on compliance with applicable legal regulations and environmental standards. At one of the locations there is a deep well from which water is withdrawn under controlled conditions. At all locations water supplied by municipal water networks is also used.

Owing to the absence of high risk, the Company does not have a separate water policy, but is ready to implement one should such a need arise. At present, matters associated with water management are covered within the ISO 14001 environmental management system. The Company's activity in the cosmetics industry is, however, subject to numerous European Union regulations that directly concern the protection of water resources, with particular emphasis on limiting the pollution of the aquatic environment by chemical substances.

Key regulations for the sector are presented below:

- In response to the threats associated with microplastics, since 17 October 2023 there has been a ban on placing on the market cosmetics containing synthetic abrasive microbeads (e.g. in scrubs). Transitional periods have been provided for other products: until 2027 for rinse-off cosmetics, until 2029 for leave-on cosmetics and until 2035 for color products⁸.
- In accordance with the provisions of Regulation 1223/2009⁹ in Article 16, nanomaterials used in cosmetics are subject to the obligation of detailed reporting in the EU Cosmetic Products Notification Portal (CPNP) system. In addition, nano forms are regulated by specific provisions in Annexes IV, V and VI to Regulation 1223/2009. The most recent regulation introducing bans and restrictions for certain forms of nanoparticles is Regulation 2024/858¹⁰.

- Restrictions have also been introduced concerning the use of cyclosiloxanes D4, D5 and D6 in leave-on cosmetics and D6 in rinse-off cosmetics. The maximum permissible concentration of these substances is 0.1%¹⁰.

Bielenda Group monitors legislative changes and adapts its production practices and product compositions to the applicable provisions, treating the protection of water resources as an important element of environmental responsibility.

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

Water consumption: optimization of technology

As part of activities associated with the rational management of water, Bielenda Group uses at its plant in Kąty Wrocławskie a rainwater pumping station system, which supports the orderly management of rainwater and its reuse on the site. Rainwater collected from roofs is directed to a separate tank and then used to irrigate green areas, including lawns.

This solution makes it possible to partially replace mains or groundwater with rainwater in applications where potable water is not required. The system constitutes a permanent element of the plant's technical infrastructure and supports the reduction of fresh water consumption, the reduction of rainwater losses and more efficient management of local water resources.



8. Regulation concerning synthetic microparticles (microplastics): Commission Regulation (EU) 2023/2055 of 25 September 2023 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) as regards synthetic polymer microparticles.

9. Regulation (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products.

10. Commission Regulation (EU) 2024/858 of 14 March 2024 amending Regulation (EC) No 1223/2009 of the European Parliament and of the Council as regards the use in cosmetic products of the nanomaterials: styrene/acrylates copolymer, sodium styrene/acrylates copolymer, copper, colloidal copper, hydroxyapatite, gold, colloidal gold, gold thioethylamino hyaluronic acid, acetyl heptapeptide-9 colloidal gold, platinum, colloidal platinum, acetyl tetrapeptide-17 colloidal platinum and colloidal silver.

11. Commission Regulation (EU) 2024/1328 of 16 May 2024 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) as regards octamethylcyclotetrasiloxane (D4), decamethylcyclopentasiloxane (D5) and dodecamethylcyclohexasiloxane (D6) provides for a 3-year transitional period for introducing the changes. From 7 June 2027 there will be a ban on placing on the market products that do not comply with the provisions of the regulation (rinse-off products containing D6 / leave-on products containing D4, D5, D6).

The scale of rainwater use, however, remains directly dependent on the level and frequency of atmospheric precipitation in a given period, which affects the amount of rainwater that can be collected and reused.

In laboratory areas, industrial dishwashers are installed, which reduces water consumption. In 2025, the Company purchased industrial dishwashers used also in production processes. As part of the implementation, steam sterilizers were also used, which

allowed to limit water consumption and contributed to reducing the amount of detergents used in cleaning processes.

In the future, Bielenda Group will continue to consider investments in reducing water consumption and minimizing discharged wastewater. Investments analyzed to date have proved insufficiently effective, or their implementation involved excessively high costs.

Investment in closing the demineralized water circuit

The purpose of the investment was to optimize the operation of the water treatment station, with particular emphasis on reducing its consumption in production processes and auxiliary activities. The project focused on the production of demineralized water, in which until now around 500 liters of wastewater arose for every 1,000 liters of demineralized water. Thanks to the installation implemented at both manufacturing plants, part of this stream is now recovered for reuse, which reduces the amount of wastewater generated.

As part of further activities, the replacement of valves is also planned in order to increase the tightness of the cooling system which, according to preliminary estimates, will make it possible to reduce water consumption by approximately 20–25 m³ per day. In addition, it is planned to redirect condensed steam back into the process (used for heating purposes), which will bring savings of the order of 4–5 m³ per day. It is estimated that these activities will increase equipment efficiency by around 20% and enable a reduction in gas consumption in generators of around 15%. These activities are intended to ensure a constant supply of steam for production processes, increase efficiency and provide a safety buffer in the event of an increase in production capacity.



Wastewater

Wastewater management is an important aspect of pro-environmental activities in the cosmetics industry. It concerns both production processes and everyday use of cosmetics. Like other branches of industry, the production of cosmetics involves the generation of water waste, which may contain chemical substances, nanomaterials and also microplastics. In response to growing environmental awareness and stricter environmental requirements, the cosmetics industry is gradually changing its approach to this issue.

Currently

98%

of our products have been verified as free from microplastics, thereby achieving the target set for 2025.

Microplastics in cosmetics constitute a serious threat to the aquatic environment – they contribute to water pollution, threaten aquatic organisms and disrupt ecosystems. Their presence in cosmetics results from the use of synthetic polymer microparticles, which increase product stability, improve its functional properties and also shape its rheology.

Unfortunately, they constitute a serious threat to the aquatic environment – they are difficult to remove, exhibit toxicity toward aquatic organisms and can enter the food chain, also threatening human health. In response to this problem, regulations are being introduced, and we – as a representative of the cosmetics industry – strive to replace microplastics with alternative, more ecological ingredients.

Currently

100%¹²

of our products contain no nanomaterials in their composition. We have thereby achieved the target set for 2025.

Nanomaterials in cosmetics constitute a challenge for environmental protection, particularly in the context of water protection. They enter the environment mainly during rinsing while bathing or showering. Although they can provide functional benefits – higher biological activity and more effective protective action – their presence in groundwater and surface water is associated with a potential threat. Nanoparticles are difficult to remove from water and in standard treatment processes – they can accumulate in aquatic organisms and trigger toxic reactions, leading to disturbances in the balance of ecosystems¹³.

As much as

99%

of our products contain no cyclic silicones. As a result, the Company exceeded the target set for 2025 by 2%.

Although cyclic silicones significantly improve the application properties of products, they are poorly biodegradable and can accumulate in aquatic organisms, which constitutes a threat to the environment¹³.

¹². Products with UV filters were excluded from this target.

¹³. Source: Shin H.S., Park J.E., Lee S.H. (2023). Cyclic Volatile Methyl Siloxanes (D4, D5, and D6) as Emerging Pollutants: Environmental Distribution, Fate, and Toxicological Assessments. Environmental Science and Pollution Research, DOI: 10.1007/s11356-023-25678-9.

Bielenda Group develops formulations and application solutions that help reduce water consumption during the product use phase.

Our portfolio includes leave-on cosmetics such as leave-in conditioners, serums, micellar waters and oils. Products of this type are of significant importance both for the environment and for everyday care:

- ② Formulations that can be removed with a tissue or left to be fully absorbed, without the need to wash the skin (e.g. the SHEHAND paraffin hand treatment, the SHEFOOT ointment for cracked heels).

- ✓ they make it possible to reduce water consumption in households,
- ✓ they reduce the demand for energy needed to heat water,
- ✓ they contribute to a more sustainable lifestyle, especially in regions affected by water shortages.

- ① Leave-in hair conditioner – a hydration and shine ritual, without rinsing. It contains hyaluronic acid, aloe and betaine, and 97% of the ingredients are of natural origin.



- ③ FOOT PROGRAM Supremelab intensely nourishing foot ointment – a specialist preparation inspired by salon formulations, created for severely dry, rough, cracked skin requiring intensive regeneration, which does not require rinsing.

Our offering also includes algae masks and algae gel masks that, despite requiring the addition of water for preparation, do not need to be rinsed off after application. Once dry, they can easily be removed in one piece, which makes them quick and convenient to use.

Our portfolio also includes products leading to the reduction of water consumption both at the stage of their production and of end use. Solutions of this type support not only climate and environmental objectives, but also **promote simple and more sustainable care routines.**

tolpa – enzyme face
wash powder – wa-
terless formulation



Bielenda Professional
– Hydro Jelly Mask



Bielenda Professional – Lifting
face mask with a glow effect and
Enzymatic powder face scrub

Also noteworthy are sachet mask formulations that do not require rinsing off, e.g.:

- ✔ **MULTI CARE SOLUTION MultiPEPTYDY** – revitalizing and firming sheet mask-serum.
- ✔ **COLLAGEN HYDROGEL MASK** – moisturizing and firming hydrogel mask with collagen.
- ✔ **Skin Clinic Ceramidy** – rebuilding and smoothing face mask.

In the case of O3 Zone hair masks, rinsing with cool water is recommended, which supports the reduction of the carbon footprint at the use stage.

From the production perspective, **Bielenda Group introduces reductions in water consumption at the stage of creating cosmetics**. Examples are waterless formulations, such as make-up removal oils and butters (e.g. Skin Harmony) and body oils from the Lumiere line, which do not require the use of water in the manufacturing process. Moreover, LUMIERE products, designed as multifunctional cosmetics for face, body and hair, support the idea of skincare minimalism. They make it possible to reduce the number of preparations used and care steps, which indirectly also translates into lower water consumption.

Although most customers choose classic cosmetic formulations, products that do not require rinsing constitute an important element in the pursuit of sustainable development in the cosmetics industry. They make it possible not only to reduce water consumption, but also to reduce the carbon footprint of products.

The results of the carbon footprint analysis (Scope 3) for the Pure Trends line show that heating water for rinsing accounts for a significant part of total CO₂ emissions. In the case of rinse-off products, as much as 90% of the carbon footprint is generated at the use stage¹⁴. Reducing water consumption across the entire product life cycle fits into the global pursuit of a more sustainable lifestyle and conscious use of natural resources.



tolpa. White ON
toothpaste series



Bielenda Collagen Hydrogel Mask
hydrogel sheet mask



HairBoom
ozone mask-treatment

¹⁴. Cradle-to-grave calculations developed jointly with the Climate Strategies Poland Foundation in 2023, in accordance with the GHG Protocol. Product Life Cycle Accounting and Reporting Standard, September 2011. World Resources Institute and World Business Council for Sustainable Development.

E3-3 – Targets related to water and marine resources

Although the Company has not set a measurable target for reducing water consumption, in its Environmental Policy it has committed to using water rationally. The enterprise undertakes activities in accordance with the Quality Improvement Plans and the environmental objectives and tasks for individual manufacturing plants, developed in line with the ISO 14001 standard. Designated employees from various departments are responsible for their implementation; they monitor progress and adapt production processes to the applicable requirements.

In the area of water and wastewater management, Bielenda Group focuses on the rational use of water, reducing the amount of wastewater generated and improving the efficiency of utilities management. The activities cover process optimization, identification of potential losses, development of water consumption monitoring and the implementation of technical solutions limiting water withdrawal in production and administrative areas.

The Company also conducts regular monitoring of wastewater parameters and analyzes the possibilities of recovering and re-using part of the process water, including demineralized (DEMI) water. These activities are complemented by educational initiatives addressed to employees, the development of products that do not require rinsing, and preventive solutions limiting the risk of failure and the uncontrolled release of substances into the sewage system.

With regard to the products offered, the company pursues environmental objectives associated with the use of nanomaterials and microplastics described under disclosure E3-2.

E3-4 – Water consumption

Data on water consumption are collected from the plants in Kąty Wrocławskie, Radzymin, Kraków and Dąbrówka Wielka. It is estimated that approximately 3–4% of total water consumption is water that is reused.

Parameters of water consumption and management of water resources

Parameter	2024	2025
Total water consumption [m ³]	37,558	33,059
Total water consumption in areas at water risk [m ³]	0	0
Total amount of water recycled and reused [m ³]	1,315	1,157
Total amount of water stored [m ³]	0	0
Water intensity [m ³ /million PLN]	73.67	61.43

E3-5 – Anticipated financial effects from material water and marine resources-related risks and opportunities

The Company made use of the transitional period provided for within disclosure E3-5. At present, calculations concerning the anticipated financial effects arising from material water and marine resources-related risks and opportunities have not been carried out.



ESRS E5 – RESOURCE USE AND CIRCULAR ECONOMY

Resource use and the circular economy (CE) is one of the key areas of Bielenda Group's environmental impact, particularly in the context of production activity and the design of products and packaging. In the cosmetics industry, based on intensive raw material consumption, growing regulatory requirements and consumer expectations encourage companies to undertake activities that limit waste, increase the efficiency of material use and implement ecodesign principles. **Bielenda Group develops initiatives that limit resource waste and support the closing of material loops.** Examples of these activities are described later in this disclosure.

The approach to the circular economy is pursued at two levels:

- ✔ **at the operational level** – through the reduction of material losses, optimization of raw material consumption and the implementation of innovations in production processes,
- ✔ **at the design level** – through the development of an offering based on upcycled raw materials, minimalist formulations and the gradual implementation of more sustainable packaging.

In 2025 activities were **directed toward the elimination of ingredients such as nanomaterials and microplastics, the recovery of raw materials from labels, the optimization of material consumption at the plants and the use of certified paper and recycled packaging.**

E5.IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

As part of the analysis of impacts, risks and opportunities, Bielenda Group carried out a review of its operational processes and of the raw materials and materials used. The aim was to identify actual and potential impacts, risks and opportunities associated with the circular economy, both within its own activity and in the value chain. The analysis covered key areas associated with the use of raw materials and cosmetic ingredients, the design and life cycle of packaging, and the generation and management of production and packaging waste. The company did not conduct separate public consultations concerning the impact of its activity on the circulation of resources and on waste management.

Material environmental impacts and business risks and opportunities were also identified, arising among other things from the need to eliminate microplastics and silicones, implement ecodesign principles, limit the share of non-recyclable packaging, and adapt to increasing regulatory and consumer requirements in the area of sustainable resource management. Detailed information concerning the identified impacts and the activities undertaken is provided later in this section.

E5-1 – Policies related to resource use and circular economy

The Bielenda Group Environmental Policy, described in section E1-2, covers key matters associated with the circular economy. In this document we declare our commitment to the rational use of resources – such as raw materials, energy and water – and to the implementation of technologies limiting emissions and the amount of waste.

As part of the implementation of these tasks, we are **modernizing our machinery park** in order to optimize the consumption of energy and raw materials. Our activities cover responsible waste management and the **promotion of environmental awareness among employees**. In 2025 we created the Ecodesign Code, described more broadly in E5-3.

E5-2 – Actions and resources related to resource use and circular economy

The Circular Economy (CE) is of key importance for the cosmetics industry, because it focuses on minimizing the negative impact of production and consumption on the environment. Like other sectors, the cosmetics sector also faces growing regulatory pressure and the expectations of consumers, who increasingly seek planet-friendly solutions.

At Bielenda Group, we have always strived to **reduce production losses and avoid unnecessary material consumption**, primarily for economic reasons, while also considering environmental impacts. This approach is applied by all employees regardless of department or structure. Within our strategy, we undertake a number of activities limiting the waste of resources and supporting the circularity of processes across the entire product life cycle. Our approach to the circular economy covers operational, design, product and educational activities.

Operational activities at manufacturing plants

Optimization of the flow of materials between manufacturing plants is one of the key activities we undertake in order to increase the efficiency of raw material use, limit overproduction and improve inventory management. As a result, we can **effectively reduce the amount of waste already at the stage of its generation**.

- Optimizing the flow of materials between plants in order to increase production efficiency and limit raw material surpluses
- Discontinuing the purchase of cardboard dividers in favor of shredded waste paper and similar solutions for the reuse of packaging
- Reducing the use of single-use materials, such as bags for bulk product
- Raw materials from the physico-chemically stable group that are approaching the end of their shelf life are subjected to thorough analytical testing and, following a positive as-

essment by the Quality Control Departments and the R&D Department, are approved for use with an extended shelf life

- Analysing non-conformities in production in order to eliminate complaints and limit disposal
- Ensuring microbiological quality, particularly in the process of producing sensitive masses, in accordance with the ISO 9001 standard
- Ensuring the technical efficiency of the machinery park through cyclical inspections and the use of spare parts
- Modernizing production lines in order to improve efficiency and operational reliability.

Activities in the area of formulations and ingredients

The use of upcycled raw materials and raw materials from sustainable sources enables us **not only to limit the consumption of primary resources, but also to respond to the expectations of consumers seeking ethical and conscious choices**.

In response to the challenges associated with responsible resource management, Bielenda Group consistently develops its **portfolio of upcycled ingredients**.

Our product range includes lines focused on minimizing negative environmental impact. An example is the tołpa "more than beauty" line using upcycled ingredients. The product formulations are based on minimalist recipes using upcycled ingredients.

In 2025, we purchased

64.85 tons

of upcycled raw materials, including fruit stone oils, extracts from agricultural residues and zero-waste type components.

These raw materials constitute an alternative to primary ingredients (i.e. those obtained directly from natural resources, without prior use in the production cycle). Solutions of this type not only support environmental objectives, but also **strengthen transparency and innovation in the area of cosmetic formulations**.



Sourcing of plant-derived raw materials and control of their origin

Bielenda Group pays particular attention to legislative requirements concerning the monitoring of raw materials.

As at the date of preparation of this report, legislative work is under way in the European Commission concerning the extension of the scope of application of the EUDR (EU Deforestation Regulation), which may significantly affect the manner of qualification, assessment and due diligence obligations for the indicat-

ed raw materials. Owing to the absence of final and unambiguous implementing guidelines and to interpretative uncertainty, a decision was taken temporarily to suspend the detailed assessment and tracking of these raw materials until the legal framework has stabilized.

In addition, difficulties are observed in the market availability of certain raw materials, such as cocoa butter, which may affect the continuity of supply and the operational possibilities of monitoring them in accordance with potential future regulatory requirements.

Raw materials based on soy, cocoa and coffee constitute a negligible proportion (below 1%) of raw materials in the portfolio, and therefore an approach based on prioritizing activities was adopted, consisting in focusing ongoing monitoring on palm oil derivative raw materials, in particular those obtained from certified sources (e.g. RSPO).

This action makes it possible to maintain compliance with the applicable standards for sustainable raw material sourcing, while at the same time limiting regulatory and operational risk.

Until the EUDR provisions have been clarified and the market situation has stabilized, the remaining raw materials from the critical group will be covered by general monitoring, without the implementation of full assessment and tracking procedures. This approach will be reviewed following the publication of the final legislative guidelines or if significant changes occur in the availability of raw materials **on the market.**

Palm oil

Bielenda Group monitors purchases of raw materials associated with palm oil, including the level of use of raw materials covered by sustainable-origin certification. The analysis covers both the total volume of purchased raw materials containing palm oil derivatives and the share of raw materials holding the appropriate certificates confirming compliance with the requirements for responsible sourcing. Monitoring is conducted on a year-on-year basis and constitutes an element of activities supporting supply chain transparency and the gradual increase in the share of certified raw materials in the Group's purchasing portfolio.

Monitoring activities

Out of concern for consumer safety and for limiting environmental impact, Bielenda Group conducts systematic monitoring of the presence of so-called undesirable ingredients, such as microplastics, nanomaterials and cyclic silicones.

These activities are an integral part of an approach based on the principles of ecodesign and on the achievement of the long-term objectives set out in the ESG strategy.

In 2025, all active products were analyzed for the presence of individual substances in their composition. It was established that:

- 🌿 **98% of SKUs** are already free from microplastics,
- 🌿 **100% of SKUs** contain no nanomaterials¹³,
- 🌿 **99% of SKUs** contain no cyclic silicones.

13. Excluding UV filters



The results confirm a high degree of compliance of the products with the adopted environmental criteria and at the same time meet the objectives set for 2025. This is proof that the achievement of subsequent objectives is not only possible, but also easy to monitor and assess.

For each type of ingredient, specific reduction targets have been set for 2030.

As part of the review of substances of particular concern, the Company analyzed the materials making up the raw materials purchased in the period under review, with particular emphasis on microplastics, nanomaterials and cyclic silicones, in accordance with the requirements of the REACH regulations and the Waste Framework Directive.

Microplastics

The share of materials containing microplastics in the total mass of purchased raw materials **amounted to just 0.002%**. The remaining materials contain no microplastics.

Microplastics covered by derogation

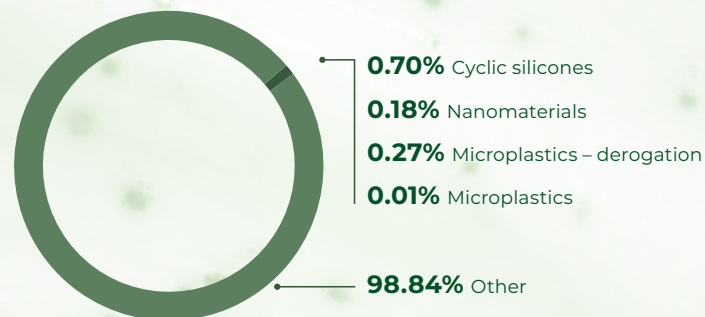
Under the applicable regulations, the use of a certain amount of microplastics under derogation has also been permitted. The share of these materials constitutes 0.32% of all purchases.

The combined share of microplastics – both standard and covered by derogation – amounted to **0.32% of the total mass of purchased raw materials**.

Nanomaterials

Nanomaterials constituted **0.15% of the total mass of purchased raw materials**. The remaining 99.85% contain no ingredients of this type, which confirms their limited and controlled use.

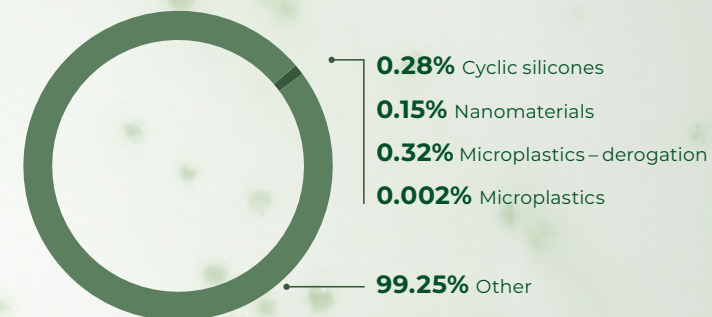
Share of substances of particular concern in the quantity of purchased raw materials [kg] in 2024



Cyclic silicones

Cyclic silicones constituted **0.28% of the total mass of purchased raw materials**. Their presence is systematically monitored in terms of potential impact on the aquatic environment and on human health.

Share of substances of particular concern in the quantity of purchased raw materials [kg] in 2025



Activities in the area of closing the loop for water, materials and packaging

Closing the loop for water, materials and packaging is another pillar of our CE (Circular Economy) strategy.

Activities in this area cover both production processes and activities associated with distribution and internal materials management.

Main activities:

- ✔ returning DEMI water to the technological circuit – at a level of 3–4% of total water withdrawal at the plants
- ✔ collecting and using rainwater to water greenery around the plant in Kąty Wrocławskie, with the help of a rainwater pumping station system
- ✔ using devices for reducing the volume of waste (including compactors) in order to limit the number of transports to external recipients
- ✔ rotating large-format packaging (e.g. pallet containers) in order to prevent its disposal
- ✔ transferring products with a short shelf life to donations and internal sales, limiting the amount of waste
- ✔ cooperation with UPM Raflatac in the area of recovering label liners – through the transfer of waste for reuse.



E5-3 – Targets related to resource use and circular economy

Ecodesign Code

As part of its activities in favor of sustainable development, in 2025, Bielenda Group created an Ecodesign Code, which functions as an internal standard for designing products in accordance with the principles of the circular economy. The document covers the entire product life cycle, from the concept stage, the selection of raw materials and packaging, through production and logistics, to the handling of packaging after it has been used.

Packaging design principles

The Code sets out principles for packaging design, taking into account the minimization of material use, the use of easily recyclable packaging, and a preference for solutions supporting the circular economy.

- ✔ minimizing material use and eliminating unnecessary packaging components
- ✔ preference for mono-materials and easily recyclable packaging
- ✔ limiting elements that hinder sorting and recycling
- ✔ use of recycled materials
- ✔ avoiding labels that cover a significant part of the packaging surface
- ✔ limiting colored and metallized plastics, black packaging, aluminum foil and multi-layer materials

Raw materials and formulations

In the area of raw materials and formulations, the Code supports the development of products with a lower environmental impact, including formulations free from microplastics, nanomaterials and cyclic silicones. The document also addresses raw materials of natural origin, certified raw materials and requirements associated with the elimination of ingredients constituting a threat to health and the environment.

Communication with the consumer

An important element of the Code is communication with the consumer. Environmental information placed on products should be reliable, comprehensible and supported by appropriate documentation. The Code contains guidelines limiting the risk of greenwashing, as well as principles for the use of environmental claims and of information on how packaging is to be segregated.



As part of the implementation of the Code, in 2026, the Company will begin placing QR codes on packaging, which direct consumers to a corporate page containing guidance on the correct segregation of cosmetic waste.

Implementation and assessment

As part of implementing the assumptions of the Ecodesign Code, the Company developed a dedicated tool supporting the verification of the compliance of new products with the adopted guidelines. The tool takes the form of a calculator and is linked to the process of introducing new products. Formal assessment of products using the tool will begin in 2026. A product will be considered to meet the requirements of the Code if it achieves at least 80% compliance with the defined criteria.

% of products compliant with ecodesign principles

2030 target

50%

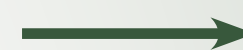


2050 target

100%

% (content) of recycled material in packaging

35%



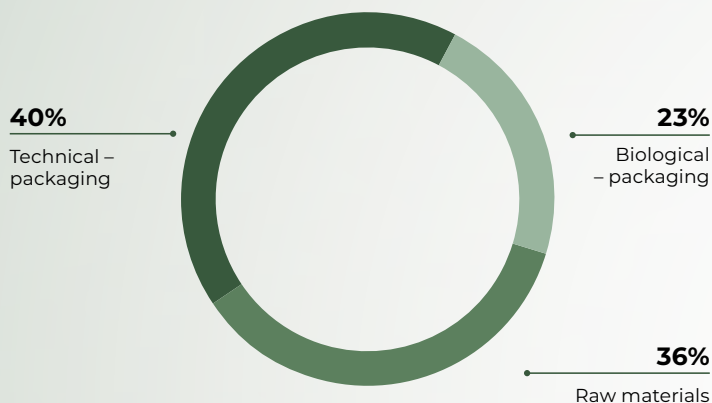
65%

E5-4 – Resource inflows

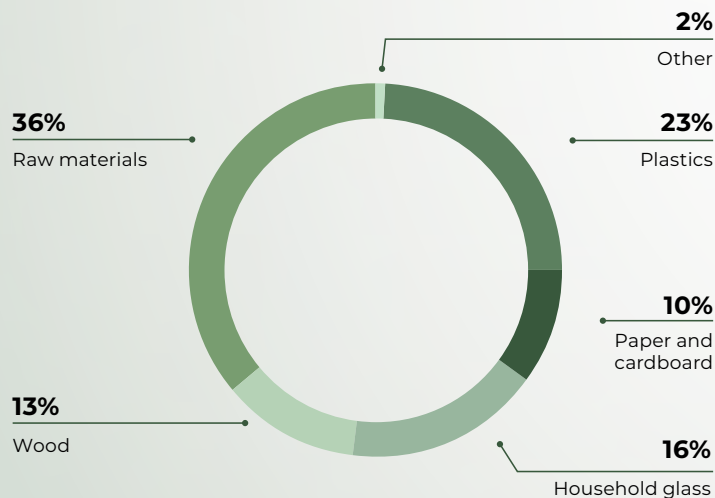
Resources necessary for the Company's operations include materials used to develop product formulations and packaging, as well as to support logistics processes.



Structure of material consumption by raw materials and technical and biological packaging in 2025 [%]



Structure of material consumption by type, 2025 [%]



Among biological materials, paper, cardboard and wood predominated – used mainly in the processes of packing and distributing products. Biological materials differ from technical ones in that they can undergo natural decomposition processes and are associated with the biological circulation of raw materials.

Raw materials are classified in a separate group owing to the previous absence of a classification into the two groups above.

The total mass of packaging materials introduced into Bielenda Group in 2025 amounted to 5,700.33 t. Of this:

40%

(2,304.63 t) were technical raw materials: plastics, household glass, aluminum, steel sheet,

23%

(1,329.73 t) were biological materials: paper and cardboard, wood,

36%

(2,065.97 t) were raw materials.

Data on the mass of materials introduced into the organization come from internal packaging material record-keeping systems and from purchasing documentation. In most cases these are data from direct measurements and weight statements, and for some items estimates based on average unit weights and sales volumes were applied. The assumptions adopted take into account typical grammages and dimensions of components, following the technical specification applied by suppliers.

Resources introduced into the organization	Unit	2024	2025
Total mass of products introduced into the organization	t	6,459.9	5,700.33
Total mass of technical materials used in packaging introduced into the organization, including:	t	2,709.9	2,304.63
Plastics	t	1,531.7	1,307.89
Aluminum	t	17.4	6.59
Steel sheet	t	6.3	2.68
Household glass	t	1,106.7	936.55
Multi-material packaging	t	47.0	51
Packaging from hazardous substances	t	0.2	0.18
Total mass of biological materials used in packaging introduced into the organization, including:	t	1,417.8	1,329.73
Paper and cardboard	t	634.0	587.81
Wood	t	783.8	741.92
Total mass of packaging materials introduced into the organization	t	4,127.6	3,634.36
Raw materials	t	2,332.2	2,065.97

The main technical materials were plastics, aluminum, steel and household glass.

16%

of our packaging contains recycled materials.¹⁵

41%

As much as of our paper packaging is made from FSC-certified paper.¹⁵

¹⁵ Data calculated based on packaging material indices.

E5-5 – Resource outflows

Waste management constitutes an important element of Bielenda Group's environmental responsibility, particularly in the context of production activity. The Company monitors the waste generated, classifying it in accordance with applicable regulations and ensuring that it is duly transferred for recovery or disposal. The data presented below reflect the actual scale and structure of waste generated in 2025.

In the case of Bielenda Group's activity, an important aspect of environmental impact is the waste generated. The greatest quantities arise within operating activity, and in particular in production processes. The total mass of waste generated in the organization amounted to **638.29 t**, of which 356.97 t (55.93%) was not recycled. At the same time, Bielenda Group fulfills obligations arising from national and EU regulations concerning packaging and packaging waste management, including requirements related to achieving recovery and recycling targets. As part of fulfilling these obligations, the Company cooperates with the packaging recovery organization REKOPOL Organizacja Odzysku Opakowań S.A., ensuring compliance with applicable legal provisions and confirming the achievement of the required recovery and recycling levels for packaging placed on the market.

In 2025, a total of 41.94 t of waste was transferred for disposal, including 32.11 t of hazardous waste and 9.83 t of non-hazardous waste. The waste was disposed of mainly through incineration processes and other forms of disposal. In the case of the Polish companies, waste data come mainly from the BDO registers. Bielenda Group continuously monitors the quantities of waste generated and analyzes data from previous years, helping to identify areas requiring particular attention.

The actual quantity of waste generated is monitored. Data are collected and processed in spreadsheets and then analyzed to support decisions regarding the direction of activities and waste management.

The data presented in the table were collected on the basis of actual data and reported to the BDO platform.

In accordance with the ISO 14001 standard, we define environmental aspects in which the types of waste are indicated as an important element, along with the place of generation and the waste code. The path for handling waste is also described, together with the required documentation and the manner of storing it.

On the packaging of each of our products we place information on its shelf life. Depending on the type of formulation, the type of active ingredients, and also the construction of the packaging and the method of application, products have a shelf life of mostly 2 to 3 years. As part of the Ecodesign Code implemented in 2025, we will also begin placing QR codes on selected packaging and products, which redirect consumers to a corporate page containing information on the correct segregation of packaging waste and on the rules for handling packaging after the **product has been used**.



Resources leaving the organization	2024		2025	
	[t]	[%]	[t]	[%]
Waste directed to recovery	735.82	99.61%	596.35	93.43%
Hazardous waste	12.74	1.72%	9.71	1.52%
Preparation for reuse	0.00	0.00%	0.00	0.00%
Recycling	2.90	0.39%	1.85	0.29%
Other recovery processes	9.84	1.33%	7.86	1.23%
Non-hazardous waste	723.08	97.89%	586.64	91.91%
Preparation for reuse	0.00	0.00%	0.00	0.00%
Recycling	339.80	46.00%	279.47	43.78%
Other recovery processes	383.29	51.89%	307.17	48.12%
Waste directed to disposal	2.86	0.39%	41.94	6.57%
Hazardous waste	2.35	0.32%	32.11	5.03%
Incineration	2.35	0.32%	2.79	0.44%
Landfilling	0.00	0.00%	0.00	0.00%
Other disposal processes	0.00	0.00%	29.32	4.59%
Non-hazardous waste	0.51	0.07%	9.83	1.54%
Incineration	0.51	0.07%	9.83	1.54%
Landfilling	0.00	0.00%	0.00	0.00%
Other disposal processes	0.00	0.00%	0.00	0.00%
Total quantity of waste generated	738.67	100.00%	638.29	100.00%
Total quantity of radioactive waste	0	0.00%	0	0.00%
Total quantity of waste not recycled	395.98	53.61%	356.97	55.93%

E5-6 – Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities

Within disclosure E5-6 the Company made use of the transitional period. At the current stage, calculations of the anticipated financial effects arising from material water and marine resources-related risks and opportunities have not been carried out.

Additional disclosures

In accordance with the provisions of Regulation 2024/1781 of 13 June 2024 and Regulation 2026/2 of 9 February 2026, we present data on products disposed of in 2025.



Report on unsold products in accordance with ESPR requirements for 2025 | Bielenda Group S.A.

Product category (CN code)	Product name / product group	Number of unsold products	Mass of unsold products	Is packaging included in the weight?	Reason for non- sale / rejection	Product / waste management method:					
		PCS.	t	YES/NO		% reused	Recycling [%]	Other method [%]	Landfilling [%]	Unknown method [%]	Total disposed [%]
						%	%	%	%	%	%
3304990	Skincare products	107,985	32.4	YES	EXPIRED	0	0	100	0	0	100
3304990	Skincare products	1,484	0.7	YES	DAMAGED	0	0	100	0	0	100
3304990	Skincare products	523	0.1	YES	QUALITY DEFECT	0	0	100	0	0	100
3304990	Skincare products (sachets)	287,500	1.6	YES	EXPIRED	0	0	100	0	0	100
33041000	Lip care products	19	0.0	YES	EXPIRED	0	0	100	0	0	100
33041000	Lip care products	51	0.0	YES	DAMAGED	0	0	100	0	0	100
33042000	Eye make-up preparations	4	0.0	YES	DAMAGED	0	0	100	0	0	100
33042000	Eye make-up preparations	13,053	0.4	YES	QUALITY DEFECT	0	0	100	0	0	100
33043000	Manicure and pedicure preparations	525	0.1	YES	EXPIRED	0	0	100	0	0	100
33049100	Make-up products	31	0.0	YES	EXPIRED	0	0	100	0	0	100
33049100	Make-up products	151	0.0	YES	DAMAGED	0	0	100	0	0	100
33049100	Make-up products	4,886	0.1	YES	QUALITY DEFECT	0	0	100	0	0	100
33049900	Other cosmetic and skincare preparations	2,057	1.9	YES	QUALITY DEFECT	0	0	100	0	0	100
33049900	Other cosmetic and skincare preparations	1,331	1.1	YES	EXPIRED	0	0	100	0	0	100
33051000	Hair care products	439	0.4	YES	EXPIRED	0	0	100	0	0	100
33051000	Hair care products	9	0.0	YES	DAMAGED	0	0	100	0	0	100
33059000	Other hair preparations	4,593	1.6	YES	EXPIRED	0	0	100	0	0	100
33059000	Other hair preparations	39	0.0	YES	DAMAGED	0	0	100	0	0	100
33061000	Preparations for oral or dental hygiene	6	0.0	YES	DAMAGED	0	0	100	0	0	100
33069000	Other preparations for oral or dental hygiene	1,976	2.3	YES	EXPIRED	0	0	100	0	0	100
33071000	Before, during and after shaving preparations	480	0.2	YES	EXPIRED	0	0	100	0	0	100
33071000	Before, during and after shaving preparations	6	0.0	YES	DAMAGED	0	0	100	0	0	100
33072000	Deodorants and antiperspirants	2	0.0	YES	DAMAGED	0	0	100	0	0	100
33073000	Bath preparations	15	0.0	YES	EXPIRED	0	0	100	0	0	100
33073000	Bath preparations	65	0.1	YES	DAMAGED	0	0	100	0	0	100
33079000	Other toilet preparations	648	0.0	YES	EXPIRED	0	0	100	0	0	100
33079000	Other toilet preparations	7	0.0	YES	DAMAGED	0	0	100	0	0	100
34013000	Organic surface-active products and preparations for washing the skin	13,068	8.7	YES	EXPIRED	0	0	100	0	0	100
34013000	Organic surface-active products and preparations for washing the skin	242	0.2	YES	DAMAGED	0	0	100	0	0	100



SOCIETY

Social responsibility begins with everyday decisions – in the workplace, in relationships and in the surroundings we co-create. We believe that a company's development makes sense only when it also brings benefit to the people around us. That is why we want to build a culture of mutual support and dialogue.



ESRS S1 Own workforce

For Bielenda Group, 2025 was a period of continuing activities associated with unifying operating systems and harmonizing procedures and work standards between the individual organizational units, including the manufacturing plants. This process was aimed at increasing operational efficiency, improving the flow of information and building a coherent work environment across the entire organization.

An additional operational challenge in 2025 was the launch of the new warehouse in Dąbrówka Wielka. This project involved not only the preparation of logistics infrastructure, but also the recruitment of qualified personnel and their comprehensive training in the applicable operational processes and procedures. This enabled the smooth onboarding of new employees and ensured operational continuity within the Group's developing logistics structure.

As part of building a shared organizational culture, in 2025 a number of integration initiatives were carried out, such as Kindness Week, the Employee Picnic and other thematic events and holiday gatherings. An important event in the area of building organizational culture was also the international integration meeting **"Under One Sky – International Team Experience"**. Employees from various countries around the world took part in the event, which made it one of the most international gatherings in the company's history. It was the first event of this type at Bielenda Group, which made it possible to strengthen cooperation between teams, exchange experiences and build relationships within the organization's global structure.

Bielenda Group wants to develop a professional environment based on safety, diversity and inclusiveness. The Company implements activities supporting work-life balance, including flexible working hours and the possibility of performing tasks remotely. At the same time, it monitors pay equality, reducing the unadjusted pay gap from 3.4% in 2024 to 3.0% in 2025. Also in 2025 we calculated for the first time the adjusted pay gap, which amounted to 2.6%. Despite advanced integration activities, the company recognizes the need for further harmonization of processes, strengthening the exchange of experiences between locations and deepening the integration of teams within the new structure. Systematic surveying of employee needs and the further development of activities supporting engagement are important elements of the organization's strategy for the coming years.

ESRS 2 SBM-2 – Interests and views of stakeholders

The interests, views and rights of Bielenda Group employees, including respect for human rights, are an important element of the Company's business model, which is described in detail in ESRS 2 SBM-2. The Company takes the employee perspective into account in human resources management processes. Trade unions operate at Bielenda Group, with which dialogue is conducted on employees' needs, their professional situation and matters arising from the applicable labor law provisions. Employees can report their needs to their direct superiors, and the issues raised are discussed at management meetings and with the HR Department – depending on their nature and



International employee integration meeting "Under One Sky – International Team Experience", 27 November 2025.

importance. In 2025 an employee satisfaction survey was conducted in the organization, the results of which are described in section S1-2.

At Bielenda Group, return-to-work conversations are held with employees following sickness absence, using the applicable form. Their purpose is to understand the experiences associated with the absence, to provide support in the process of re-adaptation and to identify any needs of the employee. An Exit Interview process is conducted in the organization, in which the reasons for employees' resignation are analyzed.

In accordance with ISO standards, procedures and processes concerning personnel management operate within the organization.

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the activities conducted in 2024, employees were involved in **identifying material ESG topics within the Double Materiality Assessment**. This process included a survey, thanks to which it was possible to collect opinions on environmental, social and corporate governance matters.

Bielenda Group conducts activity in Poland at four locations and observes the principles of work ethics. In accordance with the law, the company does not employ minors, and in the case of employing

young persons, it complies with the applicable national regulations. The Company does not currently have a transition plan in which the workforce would be involved. No cases of forced labor or child employment in the activity conducted were identified. Bielenda prohibits forced labor and the employment of minors both at its own plants and in contract manufacturing. The scope of the disclosure covers all employees employed by the organization.

Employee matters were also taken into account in the Double Materiality Assessment, and detailed information on impacts, risks and opportunities in this area is presented in ESRS 2 IRO-1 and in the description of the Double Materiality Assessment process. In

addition, when analysing the potential impacts of the strategy and business model on the workforce, the Company identified challenges specific to selected groups, including the risk of overload of persons employed in shift-work positions and the development needs of production employees and of persons returning after a longer absence.

S1-1 – Policies related to own workforce

The policies related to own workforce in force at Bielenda Group are presented below:

Policy name	Description	Scope	Responsibility
OHS Policy	The purpose of the OHS Policy is to shape a safety culture through building employee awareness and their engagement in activities for a safe work environment, as well as ensuring compliance with applicable provisions and regulatory requirements. The OHS Policy, in force since December 2024, addresses the key matter of occupational health and safety. It was developed on the basis of national legal provisions and market standards of the cosmetics industry, and its provisions are verified every two years or as needed. In the Double Materiality Assessment process, the significance of OHS topics was assessed from the stakeholder perspective, and the policy itself was verified and approved by the trade unions. The document is made available to employees on information boards and, since 2025, also on the employee portal.	The OHS Policy indicates the main commitments, which are: • Compliance with legal and internal provisions • Identification and monitoring of hazards. • Implementation of OHS at all levels of the organization. • Training of employees in OHS. • Prevention of accidents and occupational diseases. • Regular monitoring and evaluation of OHS activities. • Consultation with employees and trade unions. • Promotion of a culture of shared responsibility for safety. Scope of application: • All employees of Bielenda Group S.A. • Contractors and visitors at all Company locations.	The OHS Department is responsible for implementing the policy. Responsibility for adhering to the commitments set out in the policy lies with the employer, senior and junior management staff responsible for managing teams, and all employees.
Recruitment and employment procedure	The purpose of the procedure is to employ qualified staff and to ensure equal access to the recruitment process at Bielenda Group. Recruitment proceeds objectively and is based solely on a substantive assessment of qualifications and professional competences. Every stage of the process is to guarantee equal treatment of candidates and eliminate all forms of discrimination unrelated to competences or fit with the Company's organizational culture. The procedure addresses material topics such as: gender equality and equal pay for work of equal value, as well as diversity. The procedure applies at all locations, is based on the adopted market standards, and was not subject to stakeholder consultation.	The scope of the procedure covers: • reporting recruitment needs, the recruitment process, • the employee hiring process, induction training, • arrangements for providing the equipment necessary for work in the required position.	The Director of HR and Payroll is responsible for implementing the procedure. The entire HR Department and the staff managing employees are responsible for carrying it out.

Policy name	Description	Scope	Responsibility
Employee assessment	The purpose of the procedure is to standardize the principles for assessing work performance and the competences of production employees, in order to support the development of their qualifications and increase work efficiency. The periodic assessment system aims to: • determine the level of employees' qualifications; • determine development needs; • improve communication between superior and subordinate. The periodic assessment system constitutes a coherent set of assessment techniques, criteria and principles, adapted to the achievement of the Company's objectives. It has been in force since 2025 at all production units, and its implementation at the central warehouse is planned for 2026.	In the first stage, the assessment covered production employees at one location – Kąty Wrocławskie, which constitutes 25% of the total number of employees. In 2025 a further stage was carried out, covering the assessment of 50% of production and production-related staff. Ultimately, in the coming years it is planned to cover 100% of the team with the assessment.	The Director of HR and Payroll is responsible for implementing the procedure. Department managers and HR are responsible for carrying it out.
“Employee training and development” procedure	The purpose of the procedure is to raise employees' qualifications; it addresses the material topic of training and skills development, has been in force across the entire group since 2025 and is available in the HR department.	The scope of the procedure covers: • collecting training needs, • examining the effectiveness of the training carried out.	The Director of HR and Payroll is responsible for implementing the procedure. Department managers and HR are responsible for carrying it out.
Work regulations	The purpose of the regulations is to define the principles of work organization and order within Bielenda Group units, as well as the rights and obligations of the employer and employees. The work regulations address material topics such as: • occupational health and safety; • gender equality; • diversity; • training and skills development. Updated as of April 2024, the regulations, developed on the basis of national legal provisions and made available on the employee portal, are presented to employees before they are allowed to start work, and they confirm their familiarity with them by signature.	The document regulates, among other things: working time, attendance, breaks, OHS and fire protection duties, the anti-discrimination policy and the system of disciplinary penalties, the employee's material liability and the rules for using company equipment. The regulations set out the date of payment of remuneration, the employer's information obligations and the rules concerning shift work, overtime and task-based working time.	The HR Department and the Legal Department are responsible for implementing the work regulations. Implementation of and compliance with the regulations is ensured both by the employer and by every employee, regardless of position or type of contract.
Remuneration regulations	Updated as of January 2025, the agreement on work-life balance, prepared in accordance with national legal provisions and in consultation with the trade unions, is available in the HR Department, from superiors and on the employee portal.	The regulations set out, among other things, the structure of remuneration (basic pay, bonuses, commissions, allowances), the rules for payments for leave, sickness, downtime, business trips and for granting awards and additional benefits. The document also provides for rules on deductions from remuneration, including mandatory deductions arising from legal provisions, as well as voluntary ones with the employee's consent, such as contributions to voluntary insurance or other amounts agreed between the parties.	The Director of HR and Payroll is responsible for implementing the remuneration regulations, and compliance applies to all employees.
“Personnel management” procedure	The purpose of the process is to ensure a qualified workforce. The effectiveness of the process is assessed annually on the basis of two indicators: the completion of the training plan and employee turnover.	The procedure covers processes associated with recruitment and employment as well as employee training and development. Inputs to the process include: the Labor Code, the Company's employment and training needs, the remuneration regulations, the work regulations and labor law provisions. The outputs of the process are personnel files and a qualified workforce.	The Director of the HR and Payroll Department is responsible for implementing the procedure. He/she is also responsible for the annual assessment of the effectiveness of the functioning of the process.

Policy name	Description	Scope	Responsibility
Remote work agreement	The purpose of the document is to define the rules for performing remote work, including the obligations of the employee and the employer, OHS rules and the organization of work outside the office. Updated as of January 2025, the agreement, concerning work-life balance, developed on the basis of national legal provisions and consulted with the trade unions, is available in the HR Department, from superiors and on the employee portal.	The agreement regulates, among other things: • the procedure for applying for remote work, • hybrid work schedules, • rules of control, • equipment requirements, • protection of personal data, • payment of a lump sum for energy and Internet costs, • the possibility of occasional remote work (up to 24 days per year). The document also sets out situations in which the employer may unilaterally instruct remote work (e.g. during an epidemic), and indicates obligations regarding maintaining confidentiality and readiness to attend the office.	The Director of HR and Payroll and the Legal Department are responsible for implementing the agreement. Compliance applies to employees who are covered by remote work (including administration, HR, marketing, IT, ESG, logistics) and to positions whose nature permits remote work.
GDPR	The purpose of the regulations is to ensure compliance with the GDPR provisions and to implement the principles of personal data protection. They apply throughout the organization and are updated in the event of changes to provisions or internal procedures. The regulations are available in the HR Department and from the Data Protection Officer.	The regulations cover, among other things, the rules for using IT equipment, the password policy, management of permissions, protection of paper documentation, rules for using the Internet and e-mail, responding to incidents and the obligation of confidentiality.	The Legal Department is responsible for implementation, and compliance applies to all employees, associates and users of IT systems who have access to personal data.
Code of Ethics	Described more broadly under disclosure G1-1.		
Anti-Mobbing Policy	Described more broadly under disclosure G1-1.		

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

Trade unions play an important role in representing employees' interests. Bielenda Group cooperates with the trade union organization in identifying and addressing employee expectations.

Consultations with trade union representatives make it possible to discuss organizational matters, terms of employment, occupational

safety and other matters raised by employees. Cooperation of this type fosters transparency and strengthens employee engagement. At each location, meetings of employees with representatives of management staff are organized. Their purpose is not only to convey information on the company's development directions, but above all to talk about the challenges and expectations of the teams. Such activities make it possible to identify employees' needs on an ongoing basis and to introduce operational improvements.

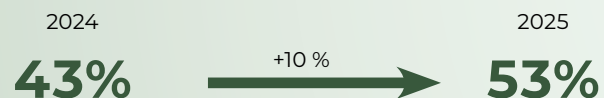
The HR Department remains an active participant in dialogue within the enterprise. Employees have the possibility of direct contact and of raising matters concerning working conditions, benefits, competence development or work-life balance. These consultations complement the formal mechanisms and are a source of information on the mood within the organization.

Employee satisfaction survey

At the end of 2025, the employee satisfaction survey was conducted again, its purpose being to examine opinions on, among other things, cooperation within the organization, relations with superiors, occupational safety, satisfaction with benefits and employee wellbeing. The survey results were analyzed in detail by the HR Department and translated into an action plan focusing on areas for improvement.

The total result of the engagement survey in 2025 improved compared with 2024 and amounted to 73%, with a participation rate of 53%. The survey made it possible to identify the strengths and weaknesses of Bielenda Group.

Participation



Engagement



In response to employees' needs diagnosed after the 2024 survey, Bielenda Group implemented a number of solutions and initiatives:

HEALTH:

a wellbeing platform with access to free and individual sessions with a psychologist/therapist, promotion of healthy habits through communication campaigns and activities, a change of medical care provider.

INTEGRATION:

integration initiatives, i.e. Children's Day, a joint picnic, Sweater Day and Kindness Day, the Christmas Eve gathering, as well as gifts for Easter and Women's Day / Men's Day.

LEARNING AND DEVELOPMENT:

strengthening internal communication, regularly provided training or webinars, oversight of the creation and implementation of annual training plans.

Main aspects examined in the Bielenda Group employee engagement survey:

What do employees value?



Quality of the products and services delivered



A sense of safety while performing duties



Relations with the direct superior



Work organization and tools



Safety and finances



Work culture and relationships



Benefits and everyday comfort

Area to work on



A culture of motivation and support for individual development



Training

Occupational health and safety

Bielenda Group is in constant contact with the trade unions, with whom discussions are held concerning actual and potential impacts on working conditions, in particular in the area of OHS.

At Bielenda Group, meetings of the OHS Committee are held once a quarter, attended in equal proportions by employee representatives – including trade unions and social labor inspectors – and by representatives of the employer and an occupational medicine physician.

The tasks of the OHS Committee, as an advisory and opinion-giving body of the employer, include:

- carrying out reviews of working conditions, including the periodic assessment of occupational health and safety;
- formulating proposals concerning the improvement of working conditions;
- giving opinions on the employer's undertakings aimed at preventing accidents at work;
- cooperating with the employer in the fulfillment of its OHS obligations.

It is standard practice in the company to hold direct conversations with employees at the level of teams, manufacturing plants and warehouses. Both OHS and HR matters are discussed at cyclical meetings with the Management Board. An annual analysis of the state of OHS and of the plan associated with improving safety takes place regularly. It is submitted for

the information of the plants' operational directors, managers, trade unions and the Management Board.

In the satisfaction survey, employees rated matters associated with OHS at Bielenda Group highly (on a scale from 1 to 10, where 10 means the highest level of satisfaction):

I have access to the necessary personal protective equipment	8.5
I feel safe on the plant premises outside the buildings (car park / warehouse surroundings)	8.6
I feel safe while performing my duties	8.4

Training

The training needs of Bielenda employees are determined on the basis of the qualification requirements of the employees employed and of business needs. In justified cases, every employee may, during the calendar year, apply for ad hoc training not included in the annual plan; this, however, requires the consent of the Director of HR and Payroll.

Average number of training hours per employee	
Employees participating in training	Average number of hours per employee
Men	7
Women	5
Other	0
Not disclosed	0
Overall average	6

Training is carried out in accordance with an annual plan and is subject to ongoing evaluation. It covers both internal activities, conducted by employees, and external training supervised by the HR Department. In accordance with the "Employee training and development" procedure, every training course is subject to assessment, and its effectiveness is monitored over time, which makes it possible to improve the competence development process.

The training process in the organization is subject to verification and continuous improvement from year to year. In accordance with the results of the satisfaction survey, we take employees' needs into account in corrective action plans.

The HR Department and direct superiors are responsible for supervising the training process. In the Company, employees are cyclically familiarized with matters in the area of ethics, anti-corruption and the reporting of irregularities. Materials associated with these areas are available to all employees on the HRM platform or on notice boards in common areas.

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

Various channels are available within the organization for reporting violations, irregularities and other observations aimed at improving quality, terms of employment and the principles of social coexistence. One of the channels is an online tool – the Ethics Line platform. Employees may also submit reports directly to their superiors or to the HR Department. The principles of operation of the Ethics Line and the Ethics Committee are described in chapter G1.

Occupational health and safety

a. Remedial measures and response to negative impacts

Each time a report concerning an OHS event is received, it is analyzed and appropriate preventive measures are determined. Depending on the type of event, the response may differ. In the case of reports of high risk and high probability of occurrence, action is taken immediately and may include the suspension of work – such situations, however, occur very rarely, and employees are informed of them without delay.

Corrective actions in the area of OHS are undertaken in accordance with an established hierarchy – first, the elimination of hazards at source is sought, and when this is not possible, technical, organizational and personal protection measures are applied in turn.

Corrective actions in the area of OHS at Bielenda Group

1. **Elimination of hazards at source:** This is the most effective way of reducing risk, consisting in the complete removal of the hazard from the work process or work environment.
2. **Substitution of the hazard:** If elimination is impossible, the hazardous process, device or material should be replaced with a less hazardous alternative.
3. **Engineering controls:** These include, among other things, the use of ventilation installations, protective screens, insulation, as well as machines and devices that reduce employees' exposure to hazards.
4. **Organizational controls:** These include, among other things, the introduction of procedures, training, machine operating instructions, and the limitation of the time of exposure to hazards.
5. **Personal protective equipment (PPE):** This is equipment that protects employees against a specific hazard, e.g., gloves,

safety goggles and helmets. It constitutes the last line of defense and is used solely when other, more effective methods cannot be implemented.

In accordance with the law, employees are referred for preliminary, periodic and check-up occupational medicine examinations aimed at medical verification and a decision on the given employee's fitness for work in a specified position.

At Bielenda Group approximately **10% of employees, from various departments, are trained in first aid**, which ensures support across all areas of the company. Appropriate rescue equipment is also available. Furthermore, as part of fire-prevention activities at Bielenda Group, technical inspections and training in evacuation and the practical use of firefighting equipment are conducted regularly. Designated employees are trained to manage evacuation.

b. Channels for raising concerns

In the areas most exposed to risk (production), meetings are held daily at which the previous day's work is summarized, including events and other OHS activities.

Every employee has the right to raise concerns in person or within the system for reporting near-miss events, by e-mail, on a paper form, or by informing their superior or the OHS specialist verbally. We want employees to be aware that they can report hazards and in this way genuinely influence the improvement of safety in the company.

Reports are analyzed by the OHS Department in cooperation with superiors, often using CCTV footage. On this basis, preventive actions are determined, and information about the event is commu-

nicated to employees. Once a quarter the OHS Committee meets, which discusses safety matters as well as proposals and projects submitted by the trade unions, and then jointly takes decisions on corrective actions.

c. Monitoring and effectiveness

The degree of implementation of preventive actions is verified differently depending on the location of the individual workplaces, e.g. during meetings of the OHS Department (every 2 weeks) with area managers, during weekly operational meetings or on an ongoing basis during walk-throughs. The number of accidents and other indicators, which are described later in the report, are monitored within the organization.



Diversity and work-life balance

1. Remedial measures and supporting activities

Bielenda Group recognizes diversity as an element of sustainable development and of organizational culture. The company promotes a work environment in which differences arising from gender, age, ethnic origin, sexual orientation, disability, religion, beliefs or lifestyle are respected. As a result, it builds a team based on mutual respect, integration and the use of employees' full potential. As part of activities supporting these matters, the Code of Ethics was created, which is described more broadly in G1-1, and appropriate reporting channels described below were implemented.

Bielenda Group supports work-life balance by offering flexible working hours and, where possible, remote or hybrid work models. Employees have access to tools and technological support that facilitate effective work outside the office.

As part of diversity management, the individual needs of the team are taken into account – an employee assessment program and development plans have been implemented, and employee satisfaction surveys are conducted annually.

2. Channels for reporting irregularities

The company has procedures for reporting and considering cases of discrimination, bullying, exclusion or work overload. Employees may report worrying situations anonymously via a special internal channel formally (a whistleblowing platform, the so-called Ethics Line) or informally (a report to a superior or the HR Department). Every report is analyzed confidentially and impartially, and if necessary appropriate remedial measures are implemented. The employer must, in line with the Anti-mobbing Policy in force and the remaining procedures, resolve the employee's report.

3. Monitoring and effectiveness

The degree of implementation of preventive actions was assessed, among other things, based on the results of the questionnaire survey, in which 73% of employees confirmed familiarity with the company platform for reporting irregularities. Despite

the information activities conducted, a need was identified to strengthen communication in this area once again. Additional reminder activities are planned, aimed at increasing the level of awareness and the availability of tools enabling the reporting of irregularities. To date, no reports concerning irregularities have been recorded via the available channels. Should a report arise, the applicable procedures guarantee full protection of the whistleblower in accordance with legal provisions and internal regulations. Any retaliatory action against the person making the report is unequivocally prohibited and constitutes a breach of internal company procedures.

In the process, the company strives for dialogue between the employer and employees and for impartiality in the case of reports, in accordance with the procedure described in S1-1.

Training

Training is described more broadly in sub-section S1-2.



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

Occupational health and safety

The safety of employees is a priority for Bielenda Group, and therefore at each location special OHS departments operate, which are responsible for monitoring the state of occupational health and safety and informing the employer of the current situation.

Key activities in the area of OHS:

- ✔ mandatory preliminary examinations before starting work, as well as cyclical inspections and measurements of working environment conditions;
- ✔ induction, periodic and thematic training (including first aid, evacuation, chemical hazards, work at height) – with an emphasis on practical exercises;
- ✔ meetings of the OHS departments with management staff, adapted to the specific nature of the plants;
- ✔ cooperation between OHS departments and the exchange of good practices;
- ✔ monitoring of the incident reporting system and simplified procedures for conduct in hazardous situations;
- ✔ access to up-to-date safety data sheets, including via the chemIQ application;

- ✔ consultations with employees and OHS departments when planning changes and purchasing new machinery and equipment;
- ✔ the possibility of changing working position and job rotation in order to limit ergonomic burdens;
- ✔ automation of selected processes in order to physically relieve employees;
- ✔ an OHS status analysis prepared for all locations of Bielenda Group S.A.

Monitoring and effectiveness are described more broadly in S1-3.

Diversity and work-life balance

As part of supporting work-life balance, Bielenda Group has implemented, among other things, **remote work regulations** (hybrid work for selected groups where this is possible) and has provided **leave in accordance with the applicable labor law provisions, including: maternity leave, parental leave, childcare and a financial holiday allowance**. Non-salary benefits are also an element of employee support, including access to private medical care and insurance, which strengthen a sense of security and support the team's wellbeing.

We encourage employees **to make use of annual leave** by emphasizing the importance of rest for health and work efficiency, offering **flexible leave dates** and **creating a friendly organizational culture** that supports work-life balance.

Training

In the cosmetics industry, where innovation, quality and customer trust are key, **the company's greatest capital is people**. The year 2025 brought many challenges, not only in the context of continuing cooperation between workplaces at all locations, but also during the intensive development of the Export department and of the employees employed there. Today we know that Bielenda Group's development must be based on investment in the competences, wellbeing and engagement of the team, which in the future will strengthen the organizational culture and support long-term growth. This is a process of continuous improvement within the organization. At the beginning of each year, managers report training needs and budget proposals, which are analyzed and approved by management staff, the HR Department and the Management Board. In 2025, the process of unifying the supervision, evaluation and assessment of training effectiveness was completed, and it is consistent across all locations. In 2025, employee assessments were implemented for production and production-related employees at two manufacturing facilities. For 2026, the implementation of this process among employees of the central warehouse in Dąbrówka Wielka is planned.

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

When setting objectives, stakeholder opinions were taken into account based on the results of the Double Materiality Assessment, the employee survey, and individual meetings. All objectives set by the Company are consistent with internal policies and constitute the basis for further activities in the area of sustainable development.

Bielenda Group strategic objectives

Criterion	Occupational health and safety	Diversity and work-life balance	Training
Objective	No serious or fatal accidents. We aim for all employed persons (100%) to be covered by occupational safety activities.	Objective: to reduce the unadjusted pay gap to a level below 5% and to calculate the adjusted pay gap.	Satisfaction survey objective: above 60%. Objective: % of employees covered by the employee assessment and development program; ultimately 100% of employees.
Measures and monitoring of the effectiveness of actions	The number of accidents and near-miss events is reported and monitored. Indicators such as injury severity and injury frequency are also under constant observation. The indicator of unused leave and of employee absences is also monitored.	The number of women and men employed, employees' origin and their age are monitored. The pay gap and the number of irregularities are calculated. The indicator of unused leave and of employee absences is monitored.	The overall indicator is examined by means of the satisfaction survey.
Progress in achieving the objectives	Progress is measured quantitatively and illustrated by means of charts. A reduction in accidents relative to the previous year is visible (downward trend). Progress is measured on an annual scale.	In 2025, the unadjusted pay gap amounted to 3%, which means the achievement of the assumed target. At the end of 2025 the adjusted pay gap was also calculated for the first time, which amounted to 2.6%.	In 2025, the employee survey was conducted for the second time for the entire group. Activities aimed at improving the results and responding to the identified needs will be implemented in 2026.
Unit responsible for measuring and monitoring progress	The OHS Department is responsible for measurement, while monitoring is carried out by the operational directors of the individual units and the Management Board.	The HR Department is responsible for measurement, while monitoring is carried out by the HR Department and the Management Board.	The HR Department is responsible for measurement, monitoring by the HR Department and the Management Board.
Base year	2020	2024	2024
Method of setting objectives	The objectives were set on the basis of market benchmarks and OHS analysis.	Setting objectives in the area of the pay gap is a process based on the systematic analysis of data, enabling the precise determination of the scale of pay differences and the planning of activities aimed at gradually reducing them.	The objectives were set on the basis of market benchmarks and HR analysis.
Results achieved and analysis of progress	In the area of OHS, the strategic objective and the planned annual activities are verified once a year during the preparation of the OHS analysis. Result for the given period: achievement of the target "0 serious/fatal accidents".	The objective and activities in the area of the pay gap are verified once a year. In 2025, the assumed result was achieved: a 3% unadjusted pay gap, and in accordance with the assumptions the adjusted pay gap was calculated, which amounted to 2.6%.	The baseline employee engagement indicator, measured based on the engagement survey for 2025, reached a level of 73%, against the assumed target of >60%, thereby achieving an improvement of 7 percentage points relative to 2024, with a simultaneous increase in participation from 43% in 2024 to 53% in 2025. A target value of >70% has been set for 2030.

S1-6 – Characteristics of the undertaking's employees

The figure of 529 employees includes persons employed at two manufacturing plants – in Kąty Wrocławskie and Radzymin – together with the adjacent offices and warehouses, at the Company's Kraków head office, comprising the office and technology facilities, at the central warehouse in Dąbrowka Wielka, and also employees operating in various regions of the world in connection with the development of export activity. The slight increase in employment in 2025 results from the further development of the Company's activity, in particular from the intensification of activities on foreign markets.

Below is presented the total number of employees as of 31 December 2025. An employee is defined as a person employed under an employment contract. The Group does not employ workers on non-guaranteed-hours contracts.

Due to the specific nature of the Company's operations, women account for

68%

of employees. This share remains unchanged compared with 2024, which reflects a stable employment structure in terms of gender.

Characteristics of Bielenda Group employees – breakdown by type of contract and working time:

Employment	Men		Women		Other		Not reported		Total		Share of employees [%]	
	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025
Total employees	166	169	353	360	0	0	0	0	519	529	100%	100%
– employed on a permanent (indefinite-term) contract	133	127	258	255	0	0	0	0	391	382	75%	72%
– employed on a fixed-term contract	33	42	95	105	0	0	0	0	128	147	25%	28%
– employees not guaranteed working hours	0	0	0	0	0	0	0	0	0	0	0%	0%
– employed full-time	163	166	352	359	0	0	0	0	515	525	99%	99%
– employed part-time	3	3	1	1	0	0	0	0	4	4	1%	1%

Characteristics of employees by gender

Gender	Number		Share [%]	
	2024	2025	2024	2025
Woman	353	360	68%	68%
Man	166	169	32%	32%
Other	0	0	0%	0%
Not reported	0	0	0%	0%
Total employees	519	529	100%	100%

Employee turnover at Bielenda Group

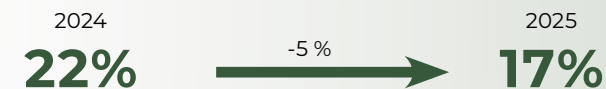
Dismissals / Departures	Number		Share [%]	
	2024	2025	2024	2025
At the employee's initiative	70	49	64%	54%
At the employer's initiative	33	37	30%	41%
Retirement	6	4	6%	4%
Death in the workplace	0	0	0%	0%
Total	109	90	100%	100%

Characteristics of non-employees constituting the undertaking's own workforce

Type of contract	Number		Share [%]	
	2024	2025	2024	2025
Self-employed	19	44	37%	54%
Regularly performing work on the basis of a contract of mandate	32	38	63%	46%
Provided by an agency	0	0	0%	0%
Total	51	82	100%	100%

Within Bielenda Group there are no employees who are not guaranteed working hours.

Turnover



The employee turnover rate was calculated as the ratio of the number of employees who left the organization in the reporting period (as a result of resignation, dismissal, retirement or death) to the average number of employees in that period.

S1-7 – Characteristics of non-employees in the undertaking's own workforce

Flexible forms of cooperation complement Bielenda Group's permanent team and make it possible to adapt resources to changing operational needs. Cooperation with persons outside the permanent workforce concerns mainly selected specialist areas and production support, and its scope is adjusted on an ongoing basis to the scale of activity and the seasonality of processes.

Measures within the material topic: Occupational health and safety

S1-14 – Health and safety metrics

In 2025, 4 minor accidents at work were recorded, which is 1 fewer than in 2024. The cause of most accidents at work in 2025 was the human factor.

The indicators monitored include:

- ✔ **LTIFR (Lost Time Injury Frequency Rate)** – the frequency rate of reportable work-related accidents (number of accidents x 1,000,000) / number of hours worked,
- ✔ **LTISR (Lost Time Injury Severity Rate)** – the severity rate of reportable work-related accidents (number of days lost x 200,000) / number of hours worked.

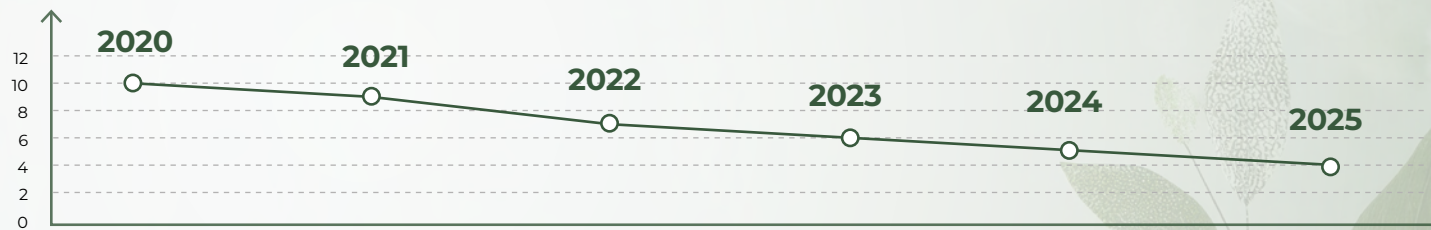
The indicators calculated in 2025 cover the entire Bielenda Group organization.

In 2025 a total of 11 near-miss events were recorded, i.e., dangerous work-related events in which no injuries occurred and no deterioration of health resulting in sick leave took place.

Data on accidents at work and accident rates – 2025¹⁶

Year	Total number of accidents	Fatal	Serious	Collective	Severity rate (LTISR – Lost Time Injury Severity Rate)	Frequency rate (LTIFR – Lost Time Injury Frequency Rate)	Average employment	Number of days of incapacity for work
2024	5	0	0	0	33.033	5.899	514	140
2025	4	0	0	0	12.654	4.774	528	53

Number of accidents at work at Bielenda Group S.A. in the years 2020–2025



¹⁶ The indicators are calculated on the basis of average annual employment in the period 01.01.2025–31.12.2025.



Measures within the material topic: Diversity

S1-9 – Diversity metrics

The diversity metrics are presented as of 31 December 2025. **In the management structure, men predominate in top management (69%), while women predominate in middle management (59%).**

Characteristics of the gender distribution in top management

Gender	Management Board		Supervisory Board		Total (Management Board and Supervisory Board)		Share [%]	
	2024	2025	2024	2025	2024	2025	2024	2025
Women	2	2	2	2	4	4	33%	31%
Men	2	3	6	6	8	9	67%	69%
Other	0	0	0	0	0	0	0%	0%
Not reported	0	0	0	0	0	0	0%	0%
Total	4	5	8	8	12	13	100%	100%

Characteristics of the gender distribution in management staff

Gender distribution in management staff	Number of employees		Share [%]	
	2024	2025	2024	2025
Women	43	47	63%	59%
Men	25	32	37%	41%
Other	0	0	0%	0%
Not reported	0	0	0%	0%
Total	68	79	100%	100%

Characteristics of the age structure of employees

Age structure of employment	Up to 29 years		30–50 years		Over 50 years	
	2024	2025	2024	2025	2024	2025
Women	71	78	211	198	71	84
Men	27	25	106	103	33	41
Other	0	0	0	0	0	0
Not disclosed	0	0	0	0	0	0
Total	98	103	317	301	104	125
Share [%]	19%	19%	61%	57%	20%	24%



Indicators related to the material topic: Diversity and work-life balance

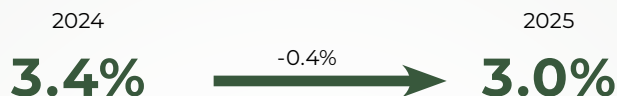
S1-16 – Remuneration metrics (pay gap and total remuneration)

The calculations of the adjusted pay gap cover all employees and all forms of employment, including persons working part-time, who were actively employed as of 31 December 2025. Persons who ended their employment or cooperation before 31 December 2025, as well as non-binary persons, were excluded from the analysis. The analysis concerning the unadjusted gap excludes the President, CEO, General Director (or their equivalents). Basic remuneration was recognized as the gross monthly amount in force on 31 December 2025. Variable and supplementary components were taken into account as the amounts actually paid over the whole 2025 calendar year.

All remuneration data were converted into annual values and into full-time equivalents (FTE). This means that:

- the remuneration of persons employed part-time was converted as if they had worked full-time,
- the remuneration of employees who worked less than a full year in 2025 was annualized accordingly.

The unadjusted pay gap amounted to:



In 2025 the adjusted pay gap was calculated for the first time, which amounted to

2.6%

S1-15 – Work-life balance metrics

Every employee employed on an employment contract is entitled to take annual leave in accordance with the law. In the case of family-related leave (understood as maternity, parental, paternity and childcare leave, as well as time off for childcare pursuant to Article 188 of the Labor Code), only specified persons are entitled to take it.

Within the Company,

91%

of eligible persons made use of the right to family-related leave (of 127 persons, 115 made use of it). The right to this benefit was available to 24% of employees.

Right to leave (employment contracts)	2024	2025
Number of employees	519	529
Number of employees entitled to take family-related leave	151	127
Percentage of employees entitled to take family-related leave	29.1%	24%

The pay gap in the organization was calculated according to the formula below:

$$\text{Unadjusted pay gap} = \left(\text{Average total remuneration of men} - \text{Average total remuneration of women} \right) / \text{Average total remuneration of men} \times 100$$



ESRS S4 – Consumers and end-users

Care for the safety, quality and availability of products constitutes one of the key priorities of Bielenda Group's activities.

Internal procedures are in place at the Company to ensure compliance with current legal requirements, with the aim of protecting consumers and building trust in the brand.

The Company identifies factors affecting the customer experience and manages processes aimed at optimizing it at every stage of the product life cycle – from design, through production, quality control, to distribution and marketing communication. It attaches particular importance to the **transparency of information on the composition and origin of cosmetics, the safety of their use and the elimination of barriers to access** – both in in-store and online sales.

This part of the report presents Bielenda Group's approach to relations with consumers and indicates the areas in which we identify impacts, risks and opportunities – from the perspective of protecting the interests of end users.

ESRS 2 SBM-2 – Interests and views of stakeholders

Consumers expect clear, comprehensible communication concerning the ingredients and properties of cosmetics, and therefore Bielenda Group adapts its information activities and marketing materials to their needs and preferences. The company maintains constant **contact with consumers and end users** via social media, e-mail and traditional correspondence. It actively follows opinions and comments appearing on the Internet, and also analyzes the complaints submitted. The voices of Bielenda Group's customers have a significant influence on setting the company's development directions, particularly in the area of formulations and the quality of cosmetics. Their suggestions translate into decisions concerning the reformulation of products and the implementation of ecodesign principles.

The needs, requirements and signals coming from the environment are examined regularly – they are a valuable source of knowledge supporting both the operating model and long-term strategic objectives. Bielenda Group listens to the voice of its audience – their trust and loyalty are for the company not only a value but also an important measure of the effectiveness of our ac-

tivities. Thanks to open dialogue with customers, areas requiring improvement were effectively identified and new development opportunities were recognized in the area of creating innovative, safe and responsible products. Such an approach makes it possible to **build a resilient business model** that responds to dynamically changing social and market challenges.

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Impacts on consumers and end users are closely linked to Bielenda Group's strategy and business model. The Company offers a broad range of cosmetics available through various sales channels – both in-store and online – providing wide market reach and direct access to a large group of users. Transparency regarding the composition and properties of products is one of the pillars of the brand's strategy, fitting into customers' growing expectations regarding safety, availability and the reliability of information. Product safety management covers the entire life cycle – from designing formulations and laboratory tests, through production processes, to complaint handling – and affects the shape of the operating models.

The material risks and opportunities identified have both an operational and a reputational dimension. Potential risks include:

- ✔ incidental allergic reactions arising from users' individual characteristics,
- ✔ incorrect use of products (for example, disregarding the instructions for use),
- ✔ failure to carry out the recommended patch test and failure to read the ingredients indicated on the product packaging,
- ✔ improper storage conditions – both at points of sale and by end users,
- ✔ improper transport and logistics conditions in e-commerce sales.

Among the main opportunities, the Company identifies **increased customer loyalty**, built through credible communication and an offering that responds to the needs of people with sensitive skin, allergies, or ethical preferences, such as the choice of vegan cosmetics. At the same time, growing expectations regarding transparency also create reputational risk – particularly in situations where marketing communication may be perceived as imprecise or misleading (e.g. an accusation of greenwashing).

The scope of the disclosure covers all consumers using Bielenda Group products – regardless of the distribution channel. This impact is particularly significant in the case of consumers who expect products to comply with the manufacturer's declarations and to be safe in use, and also in the case of persons potentially exposed to the effects of the improper use of cosmetics.

The Company also identifies particularly vulnerable groups, such as persons with **skin allergies, pregnant women, children or persons with limited access to financial resources**. In response to their needs, products at affordable prices are offered and cosmetics are provided as donations.

Bielenda Group undertakes a number of activities aimed at minimizing risks and strengthening its positive impact on consumers. Among the most important initiatives are:

- ✔ ensuring the compliance of labeling with applicable legal provisions,
- ✔ conducting mandatory laboratory tests,
- ✔ complaint handling within the ISO 9001 quality management system,

- ✔ adapting marketing activities to current and planned regulations (including provisions concerning environmental claims),
- ✔ educating consumers through labels, social media and other brand communication channels,
- ✔ educating consumers through the implementation of information activities and legal requirements, including educational campaigns concerning the correct segregation of waste carried out in cooperation with REKOPOL.

These activities are consistent with the results of the Double Materiality Assessment, within which **four key aspects of relations with consumers were identified:**

- ✔ providing information on composition,
- ✔ safety of cosmetics,
- ✔ availability,
- ✔ responsible marketing.



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

Policy name	Description	Scope	Responsibility
Integrated management system policy ISO 9001, ISO 14001, ISO 22716	The main objective of the policy is to ensure the safety and high quality of the products offered by the organization. The policy refers to the ISO 9001, ISO 14001 and ISO 22716 standards. The document describes the principles of designing, producing and selling cosmetics in accordance with regulations, quality standards and customer expectations. The policy covers, among other things: - care for composition, - innovative formulations, - safe raw materials, - responsible marketing communication, - development of distribution, - cooperation with suppliers. The policy has been in force since June 2011 and is updated at least once a year or as needed. Before implementation it was consulted with the Management Board and management staff. It was approved by the Management Board and made available internally.	The integrated management system policy relates to the design and development of cosmetic products, ensuring their quality and safety at every stage of the company's activity and care for transparent communication with customers. It also covers cooperation with suppliers of raw materials, components and packaging, as well as activities aimed at ensuring the broad availability of our products on the market.	The person responsible for the policy is the Management and Complaints Officer. All employees and the Management Board are responsible for the implementation of the assumptions, activities and objectives contained in the policy.
P 2.01 Marketing activities procedure and P1 Marketing analysis and planning	The purpose of the procedure is to define the principles and manner of conduct within the marketing activities carried out at the Company. The document defines methods of action with regard to the following areas: - planning marketing activities, - market research, - customer acquisition, - promotional activities. The procedure also contains guidelines concerning the analysis of the current marketing situation of the company's environment (industry trends, forecasts concerning strategic markets, competing brands and products, research and analysis of consumer needs and labeling). Procedure P2.01 has been in force since May 2004, and P1 since November 2024.	The procedure defines the manner of implementing strategic marketing activities within established time and budget frameworks, taking into account the Management Board's supervision of their course. The marketing activities plan is prepared on the basis of an analysis of market trends in the cosmetics industry, the level of customer satisfaction and the effectiveness of marketing activities carried out in previous years. The marketing plan is created on the basis of the company's operating strategy set by the Management Board and defines activities for the coming year, taking into account the organization's mission, objectives and tasks.	The person responsible for implementing the procedure is the Marketing Director. The persons responsible for carrying out marketing activities are the Marketing Director and the managers: Head of Product Department.
Procedure P3.01 Implementation of new cosmetic products for Radzymin and P2 Product design for Kąty Wrocławskie	The purpose of procedures P3.01 (for the plant in Radzymin) and P2 (for the plant in Kąty Wrocławskie) is to ensure that the process of designing new products and modifying existing products proceeds in accordance with principles guaranteeing high product quality and safety, as well as compliance with customer requirements. These documents set out the principles and procedure for designing new products and modifying existing ones and implementing them into production. These procedures also ensure the compliance of products with applicable industry provisions, including: - the Act of 4 October 2004 on cosmetic products, - Regulation (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products, - Commission Regulation (EU) No 655/2013 of 10 July 2013 laying down common criteria for the justification of claims used in relation to cosmetic products. Procedure P3.01 has been in force since May 2004, and procedure P2 since October 2024.	The procedure concerns the planning of the implementation of new products or the modification of existing ones. After obtaining the approval of the Marketing Director or a Management Board Member, an implementation order is initiated and documentation confirming product safety is compiled. It covers, among other things: - preparation of a product safety assessment report in accordance with P2/PR5/I2, - notification of the product on the cosmetic products notification portal (CPNP / SCPN) in accordance with P2/PR5/I3 Notification on the CPNP portal.	The technologist is responsible for implementing the procedure. The following are responsible for carrying it out: - the team of technologists, - the Head of the Formulation Development Department, - the Head of the Product Compliance and Registration Department, - the Regulatory Affairs Manager, - the Head of Product Department.

Policy name	Description	Scope	Responsibility
Complaints procedure P01.08 for Radzymin and P10 customer service for Kąty Wrocławskie	The purpose of procedure P01.08 is to define the procedure for handling complaints concerning finished goods and the manner of documenting them. The procedure also regulates the manner of conduct in the event of the return of a product which is not a non-conforming product, but which at the customer's premises has passed its shelf life or has been damaged. Every complaint submitted will be accepted, examined and assessed as to its merits. The purpose of procedure P10 (for the plant in Kąty Wrocławskie) is to ensure the proper fulfillment of customer orders – in accordance with their requirements concerning product quality, delivery deadlines and documentation. Procedure PR5 concerns quality complaints, while procedure PR10 concerns quantity complaints submitted by customers.	The procedure defines the manner of ensuring the handling of quality complaints submitted by customers. It covers the principles for clarifying reports and non-conformities, root cause analysis, and the taking of corrective or preventive actions.	The person responsible for the complaints procedure is the Integrated Management System and Complaints Officer, while managers are responsible for the correct course of activities, inspections and testing, and the analysis of causes. The Quality Control Department at the Radzymin location, the Quality Assurance Department in Kąty Wrocławskie and the managers of the departments responsible for the areas in which the non-conformity was identified are responsible for the process.
Code of Ethics	It addresses consumer safety during the use of products, constituting one of the ethical foundations of the activity – discussed more broadly in G1-1.	n/a	n/a
Purchasing Policy	The main objective of the policy is to ensure responsible purchasing practices taking into account environmental, social and ethical aspects. The policy assumes, among other things: • preference for suppliers using sustainable raw materials, • elimination of forced labor and child labor, • activities aimed at reducing the carbon footprint, • building relationships based on trust and shared values. The policy has been in force since September 2024	The policy relates to all purchasing activities, including the selection of suppliers, the selection of materials and components, the assessment of compliance with ESG principles, the verification of environmental strategies (e.g. reduction of the carbon footprint, sustainable sourcing of raw materials), cooperation on reducing packaging waste and compliance with labor law and ethical principles in the supply chain.	The Purchasing Department and the Supply Department are responsible for the policy.
Code of cooperation with suppliers	The purpose of the code is to define minimum standards of conduct in the area of respect for human rights, environmental protection and ethics in suppliers' activities. The code is based on UN, ILO and OECD documents and imposes on suppliers a number of obligations, including a prohibition on employing children, counteracting discrimination and violence, and ensuring safe working conditions. The policy has been in force since September 2024.	The code applies to all suppliers and sub-suppliers cooperating with Bielenda Group. It covers the following activities: • elimination of forced labor and child labor, • compliance with the principles of occupational health and safety, • counteracting discrimination and harassment, • respect for the right to freedom of association, • ensuring fair remuneration and compliance with provisions concerning working time, • activities for environmental protection (including emission reduction, protection of biodiversity), • prohibition of corruption and the obligation to comply with legal provisions, • promotion of animal welfare.	Those responsible for implementing the code are: the ESG Manager and the Legal Department. The departments responsible for carrying it out are: the Purchasing Department and the Legal Department.

S4-2 – Processes for engaging with consumers and end-users about impacts

The engagement of consumers and end users is carried out both **directly** and **indirectly** – depending on the nature of the given topic or project. We treat the opinions of end recipients as an important source of information, having a real influence on the decisions taken. For us, they are not only confirmation of the effectiveness of our activities, but also a pointer to areas requiring further improvement.

As part of the work on the quality and functionality of cosmetics, formulation tests are conducted at independent research institutes.

All Bielenda Group products are developed in accordance with applicable legal provisions. The compositions of cosmetics are fully transparent and available to consumers – placed directly on the outer packaging. In the case of additional questions or reports (including complaints), customers can contact us via the available communication channels, e.g. e-mail.

In specified cases the Company makes use of cooperation with **industry experts** who possess specialist knowledge of the needs and expectations of end users. The compliance of the content placed on packaging with current legal provisions is verified on an ongoing basis, with due care as regards the clarity, transparency and credibility of the message. Where necessary, ambiguous matters are consulted with external certification or advisory bodies.

In justified cases, Bielenda Group also cooperates with independent research companies in order to precisely define the target groups of the brands and to better tailor marketing communication to the expectations of specific customer segments.

S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

Bielenda Group has formal procedures enabling consumers to submit complaints and report adverse reactions – via a **helpline**, **e-mail** and **contact forms**. Reports go directly to the **customer service team** (without the participation of a third party) and are individually analyzed by internal teams from the Regulatory and Product Compliance area and through close cooperation with the Polish Union of the Cosmetics Industry (PZPK). In the case of confirmed incidents, corrective actions are undertaken – from changes to the formulation to remedial actions in the production process. Information concerning adverse reactions and consumer reports may also be transmitted to the competent supervisory institutions, including the authorities of the State Sanitary Inspection (Sanepid). In the course of the inspections carried out, these institutions verify the compliance of product documentation with applicable legal provisions, including possession of the required tests, records confirming product claims, safety assessments, instructions for use and information concerning precautions.

Every product, before being placed on the market, undergoes a safety assessment by a **Safety Assessor**, and information on composition and instructions for use are clearly communicated in order to limit the risk of incorrect use. The effectiveness of the complaints system is monitored, and the conclusions are used to improve products and processes.

The Company ensures compliance with legal provisions and monitors legislative changes thanks to the activities of an internal compliance team and cooperation with the PZPK. The Company also conducts an annual analysis and verification of changes in national and EU legal provisions. The Legal Department and designated organizational units responsible for compliance and quality areas are in particular responsible for monitoring and implementing legislative changes. Bielenda Group also cooperates with industry organizations and entities supporting adaptation to regulatory requirements, including REKOPOL Organizacja Odzysku Opakowań S.A. in the area of labeling packaging for segregation, meeting obligations associated with packaging management and environmental reporting, and implementing new requirements concerning the ecodesign of products and packaging in force at European Union level.

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns have also been taken into account in the violation reporting procedure.

S4-4 – Managing material impacts, risks and opportunities related to consumers and end-users, and effectiveness of those actions

Safety of cosmetics

Consumer safety constitutes the **foundation of Bielenda Group's approach to designing, producing and placing cosmetics on the market**. Every new formulation is developed exclusively using legally permitted ingredients, taking into account internal lists of prohibited and undesirable ingredients – especially in products intended for vulnerable groups, such as children or pregnant women. These ingredients are systematically analyzed for the presence of microplastics, nanomaterials and silicones.

All Bielenda Group products **undergo a Safety Assessment, which is performed by qualified specialists (Safety Assessors)**. This assessment covers the toxicological analysis of ingredients, the intended use of the product and the results of application, dermatological and instrumental tests. In addition, **challenge tests** are performed, confirming the microbiological stability of the product. Every cosmetic is approved for sale exclusively after obtaining a positive safety assessment.

The Research and Development (R&D) Department and the Regulatory Affairs Manager – in cooperation with external experts and the Polish Union of the Cosmetics Industry (PZPK), of which the Company is an active member – are responsible for the ongoing monitoring of legislative changes and their implementation.

Quality of cosmetics

The high quality of Bielenda Group products is ensured by a multi-stage control system carried out by the **Quality Control Department**.

It covers:

- ✔ detailed verification of raw materials and packaging delivered to the plant,
- ✔ inter-operational control at the production stages,
- ✔ final assessment of finished goods.

Physico-chemical and microbiological tests are carried out both on components and on finished products. The samples taken are archived in accordance with the applicable procedures, and production areas are subject to constant microbiological control.

In the event of adverse reactions, consumers may submit complaints via the helpline, e-mail or other available contact channels. Reports are considered individually and directly by the Company – without the participation of intermediaries – which increases the effectiveness of activities and the speed of response. Complaints are monitored, and their analysis makes it possible to introduce improvements in formulations or production processes.

Bielenda Group **consistently develops a portfolio of products created in accordance with the assumptions of responsible production, high quality standards and trends associated with sustainable development**.

The Group's portfolio includes vegan products, which constitute **80%** of the total assortment. The largest share in this category is held by the Bielenda and tołpa brands. In our assortment we have **63** products with Viva Vegan certification.

The Group also conducts activities associated with the implementation of **"cruelty free"** certification in cooperation with the PETA organization. The process is to cover all brands belonging to the Group's portfolio and constitutes an element of the further development of standards of responsible product creation.

An important element of the offering are products with a high share of raw materials of natural origin, in accordance with the guidelines of the ISO 16128 standard. Most products in the portfolio of the Group's brands achieve a share of such ingredients at a level of at least **90%**.

Such a broad scale of engagement in ethical and sustainable production confirms the transparency of the Bielenda Group's activities and its care for the wellbeing of people, animals and the environment.

The Company thereby builds trust among consumers who are looking for conscious and responsible choices.

Availability of products

Bielenda Group conducts sales in physical stores and online, ensuring broad access to products. The Company's portfolio includes cosmetics adapted to diverse needs – both skincare-related and financial. The offering includes, among other things, **products for persons with sensitive skin, vegan cosmetics and hypoallergenic cosmetics**.

Availability is also supported through corporate social responsibility activities – including donations of products to persons in need and to aid institutions.

Thanks to a **diversified offering and price optimization**, Bielenda Group responds to the needs of a wide range of consumers and contributes to increasing their social inclusion.

Responsible marketing

Bielenda Group's marketing communication is based on **reliable data, research results and certificates confirming product properties**. We make every effort to ensure that all information placed on packaging and in promotional materials complies with applicable legal provisions and with internal standards of transparency.



Bielenda Group is a brand that for years has **listened attentively to the needs of women** – their aspirations, expectations and everyday challenges. Responding to the need to support psychological wellbeing, in 2025, the company ran the social campaign **“Think of yourself and act!”**, which is described in the ESG Strategy chapter.

S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Bielenda Group has set objectives in the area of product safety. In the case of the remaining material impacts, risks and opportunities it is at the assessment stage – considering whether and how to set specific indicators. Although consumer opinions are not yet formally incorporated into the process of setting ESG objectives, the Company monitors the market, analyzes customer reports and responds to their needs. These activities serve to optimize both the product offering and marketing communication.

In the internal processes of manufacturing and approving products, the following are ensured:

- ✔ safety of cosmetics,
- ✔ information on composition,
- ✔ responsible marketing.

Activities focus primarily on responding to customer needs on an ongoing basis, ensuring the compliance of product composition and labeling with legal provisions, and maintaining transparency in marketing communication. Matters such as the safety of cosmetics, information on composition and responsible marketing are

taken into account in the internal processes of manufacturing and approving products. In 2025 a project was carried out addressed to the Company's key departments, in particular the marketing department, aimed at counteracting the risk of greenwashing and strengthening the compliance of marketing communication with applicable regulations and market good practices.

Within the project the following activities were carried out:

- ✔ a training workshop was held concerning the issue of greenwashing and regulatory requirements (including the PPWR), covering the analysis of case studies,
- ✔ internal guidelines were clarified concerning permissible communication practices, including requirements and prohibitions in the area of environmental communication,
- ✔ an audit was conducted of all brands from the Company's portfolio in terms of the risk of greenwashing in marketing communication,
- ✔ a remedial action plan was developed.

In addition, periodic refresher training has been planned and will be conducted annually to maintain a high level of employee awareness and ensure the consistency of environmental communication with current regulations and the Company's guidelines.

The Company is considering the implementation of a system of indicators that will make it possible to measure the quality of communication with customers, the number of complaints and enquiries, and opinions concerning labels and marketing messages. This will make it possible to better assess the effectiveness of activities and to tailor objectives precisely in the future.



CORPORATE GOVERNANCE

Responsible decisions require clear principles and transparent processes. Corporate governance is the space where ethics meets professionalism, and trust becomes the foundation for action.



ESRS G1 – Business conduct

Bielenda Group consistently implements good corporate governance practices, building an organizational culture based on honesty, transparency and responsibility.

The Company has implemented:

- ✔ a Code of Ethics,
- ✔ a Supplier Code,
- ✔ a violation reporting procedure (whistleblower protection – whistleblowing),
- ✔ an internal Anti-Mobbing Policy,
- ✔ a Policy on the responsible use of artificial intelligence (AI) tools of Bielenda Group S.A.,
- ✔ an Ecodesign Code.

Thanks to these documents, it is possible to safely report irregularities and to maintain standards of cooperation – both within the organization and in relations with business partners. This is the foundation of a work environment based on mutual trust and respect for ethical principles.

Bielenda Group's operating model encompasses an international supply chain, including purchases of raw materials from higher-risk regions. In 2025, the Company reduced the scale of sourcing raw materials from higher-risk areas. Currently, raw materials come from two countries considered to be higher-risk areas, with one raw material being sourced from each of them. In 2024, similar purchases involved four countries.

This change reflects the Company's activities directed at optimizing the supply chain and limiting potential risks associated with sourcing raw materials from higher-risk regions.

Bielenda Group focuses on long-term, transparent cooperation with business partners, which makes it possible to increase control over the social and environmental impact of the contracts carried out. These activities are an integral part of the Company's sustainability strategy.

ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies

The detailed roles and scope of duties of the administrative, management and supervisory bodies are described under ESRS 2.

ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

The following were recognized as material topics within business conduct:

- ✔ corporate culture (including the Code of Ethics),
- ✔ management of relationships with suppliers, including payment practices.

They are described more broadly in SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model.

G1-1 – Business conduct policies and corporate culture

To ensure that our activities comply with generally applicable legal requirements and procedures, and to prevent conflicts and irregularities resulting from breaches of these requirements, we have introduced a Code of Ethics within our organization.

This document sets out the principles to be followed in everyday work and when making business decisions.

Among the key values of the Code are:

- ✔ **loyalty** – we expect employees and members of the management board to act in the best interest of the company, putting its development and the protection of value first;
- ✔ **honesty and responsibility** – we promote attitudes based on integrity, respect for other people and for the natural environment.

We encourage the reporting of any breaches of the Code – a swift response makes it possible to prevent the escalation of problems and strengthens the culture of responsibility in our organization.

Bielenda Group's organizational culture is reflected in the formally adopted values, mission and vision of the organization, which are set out in strategic documents and internal policies (including the Code of Ethics and the violation reporting procedure). These values include honesty, responsibility, respect for people and the environment, and operational transparency. Corporate culture is assessed through employee surveys and engagement assessments.

Policy name	Description	Scope	Responsibility
Code of Ethics	The policy has been in force since September 2024. Its purpose is to: • promote responsibility and honesty, • prevent unethical practices, • support compliance with regulations, • build organizational culture, • educate and develop employees. It supports transparency, loyalty and the resolution of ethical conflicts. A whistleblower platform has been implemented in the organization, to make it possible to report irregularities. Two trade unions also operate at the company, which constitutes confirmation of freedom of association. Employees take part in dialogue with the employer, and ESG non-conformities are regularly discussed and assigned in the ESG matrix.	It includes references to national regulations, industry ethical codes and international guidelines (UN – Global Compact, OECD). It applies to all employees and stakeholders. The Code is made available internally. Its publication on the website is also planned.	The Code of Ethics was developed by the ESG Department in cooperation with the Legal Department and was subject to the approval of the Management Board. The Legal Department is responsible for implementing the Code of Ethics and for updating it. Both every employee and the Management Board are responsible for observing the Code of Ethics.
Bielenda Group S.A. Supplier Code of Conduct	In force since 16 September 2024. The main purpose of the Code is to ensure that suppliers act in accordance with the organization's values and standards, comply with the law, care for the environment, treat employees and stakeholders fairly and maintain high quality of products and services. The Code supports sustainable development, respect for human rights, fair competition and occupational health and safety. As part of the activities, a whistleblower platform for reporting irregularities has been implemented. Monitoring of codes signed with suppliers of raw materials and packaging is also conducted (with a distinction between strategic and other suppliers), as well as monitoring of ESG non-conformities in the matrix with the assignment of responsibility and implementation deadlines. The opinions of stakeholders collected during the Double Materiality Assessment were also taken into account.	The Code is based on three pillars: social matters – prohibition of forced labor and child labor, counteracting discrimination and harassment, freedom of association and the right to collective bargaining, health, safety, minimum wage and working time; environment – minimization of the negative impact on the surroundings; ethics – combating corruption, application of sanctions, animal welfare, protection of consumer interests, principles of fair competition. It applies to: suppliers of raw materials and packaging, sub-suppliers, temporary employment agencies. It does not apply to suppliers of low financial materiality. It contains a reference to national regulations, industry codes of conduct and international guidelines (e.g. OECD).	The Supplier Code of Conduct was developed jointly by the ESG Department, the Legal Department and the Purchasing Department and was subject to the approval of the Management Board. The Purchasing Department is responsible for its implementation and updating, while both Bielenda Group S.A. and every supplier with whom the Code has been signed are responsible for compliance.
Violation Reporting Procedure (Whistleblowing)	The purpose of the violation reporting procedure is to provide whistleblowers with a safe route for submitting reports of observed breaches of the law. This procedure has been in force since June 2024 and is to be reviewed once every three years. It is based on Article 25 of the Act of 14 June 2024 on the protection of whistleblowers. Within the procedure there is a process for monitoring reports. The verification of reports and their register are maintained within the Ethics Committee. Training on processing a report to the Ethics Committee took place in June 2024. The content of the procedure is made available to potentially interested parties and stakeholders on the employee platform, and also on the notice board. Information about the procedure is provided each time to persons or legal entities applying for employment, a commission or a contract at Bielenda Group S.A. at the stage before signing the relevant agreement. The possibility of making external reports is ensured via the corporate website.	A report of a violation covers information, including a reasonable suspicion concerning an act or omission that constitutes a breach of legal provisions or of the principles in force at Bielenda Group, including, for example, in the area of human rights or the Code of Ethics. The procedure applies both within the organization and in relations with external stakeholders.	The violation reporting procedure was created by the Legal Department together with the HR Department in cooperation with an external adviser. The procedure was subject to the approval of the Management Board. The Legal Department is responsible for implementation and updating. The right to report violations is available to everyone, regardless of whether they are employed by the organization or are an external stakeholder.
Internal Anti-Mobbing Policy	The policy has been in force since 1 January 2025 and sets out the principles for preventing mobbing and responding to cases of violations. The document defines mobbing in accordance with the Labor Code and indicates the obligations of the employer and employees in the area of building a work environment free from harassment, intimidation and psychological violence. The policy places emphasis on respect for dignity and personal rights, the prevention of conflict situations, the promotion of the principles of social coexistence and the creation of an organizational culture based on mutual respect. It provides for a procedure for submitting complaints, considering them and conducting an explanatory procedure in a confidential manner.	The policy covers all Bielenda Group employees and concerns both employee–employee and employee–superior relations. The scope of the regulation covers: the definition of mobbing and prohibited conduct, employees' obligations with regard to counteracting harassment and psychological violence, the rules for submitting complaints and the procedures for considering them, the appointment and functioning of the Anti-Mobbing Committee, the rules of confidentiality and of documenting proceedings, sanctions for perpetrators of mobbing and protective measures for injured persons.	The Employer (the Management Board of Bielenda Group S.A.) is responsible for the implementation of and supervision over the policy; it appoints and services the Anti-Mobbing Committee. The Committee analyzes complaints, conducts explanatory proceedings and issues decisions. Employees are responsible for observing the principles of the policy, reporting cases of violations and cooperating during proceedings.

Policy name	Description	Scope	Responsibility
Policy on the Responsible Use of Artificial Intelligence (AI) Tools of Bielenda Group S.A.	The policy has been in force since March 2026. Its purpose is to ensure that the use of AI tools takes place in a responsible, ethical and safe manner, in accordance with legal provisions, internal regulations and the principles of professional ethics. The document establishes the principles of human responsibility for actions supported by AI, requirements concerning the verification of content generated by AI tools, and standards concerning data protection, confidentiality and information security. The policy also defines impermissible applications of AI, the rules for using free and commercial tools, and the requirement to maintain transparency and minimize technological and legal risks.	The policy covers all employees and associates using AI tools within their professional duties. It concerns both locally hosted and cloud-based tools, as well as tools made available by third parties. The scope of the regulation covers, among other things: users' responsibility for content generated by AI, restrictions associated with processing confidential and personal data, rules for using free AI tools (permitted only for public data), the process of authorizing new AI tools by the IT department, rules for setting up accounts, licensing and information security, procedures for reporting incidents or breaches associated with AI.	The IT Department, in cooperation with the Management Board and the owners of business processes, is responsible for supervising and updating the policy. Employees are obliged to apply the principles of the policy, report incidents and comply with the guidelines concerning data protection and information security. A breach of the Policy may result in the application of disciplinary measures in accordance with the Labor Code.
Anti-Corruption Code	The Anti-corruption Code, in force since 2026, sets out the principles for counteracting corruption and for promoting transparency, honesty and integrity in Bielenda Group's activity. The document defines actions regarded as corrupt, describes the types of financial and non-financial benefits, indicates the risks associated with conflicts of interest and sets out the rules of conduct in the event of a suspicion of violations. The Code also covers the system for reporting irregularities and the consequences of breaching the applicable principles.	The document applies to all employees and associates of Bielenda Group S.A., regardless of the form of employment. It covers relations with contractors, business partners and representatives of the public and private sectors. The Code constitutes an integral part of the Company's system of internal regulations and applies in all areas of the organization's activity.	All employees, associates and management staff are responsible for implementing and observing its provisions. Reports of potential violations are made via the internal system for reporting irregularities.
Ecodesign Code	The Code sets out the principles for designing products and packaging taking into account their environmental impact across the entire life cycle. Its purpose is to support solutions conducive to recycling, to limit the use of environmentally problematic materials and raw materials, to ensure compliance with regulations and to counteract greenwashing.	The Code applies to all products, regardless of the sales channel and target segment. It covers activities associated with designing and implementing products within the company's portfolio, in particular: developing new products and cosmetic lines, rebranding and updating existing solutions, the selection of packaging, raw materials and technologies, the preparation of markings and environmental messages, and contacts with suppliers of packaging components and raw materials.	The units participating in the product development process are responsible for applying the Code, in particular the Marketing, Purchasing, Packaging and R&D departments, as well as the Management Board, which verifies the merits of implementing a product.



G1-2 – Management of relationships with suppliers

Bielenda Group conducts its activity on the basis of a network of suppliers and partners who support the company at various stages of the value chain – from the supply of raw materials to temporary work services. In 2025, the Company cooperated with 258 active suppliers, of whom **64** are so-called category A suppliers – accounting for 80% of the value of purchases and constituting 25% of all partners. In addition, **26** subcontractors carry out the production or assembly of products, and **5** temporary employment agencies support the Company in flexible human resources management.

Suppliers cooperating with Bielenda Group operate in national and international markets, including in regions considered to be higher risk. In 2025 the Company reduced the scale of sourcing

raw materials from such areas. Currently, raw materials come from two countries considered to be higher-risk areas, with one raw material being sourced from each of them. By comparison, in 2024 purchases covered four such countries.

This change reflects the Company's activities directed at optimizing the supply chain and limiting potential risks associated with sourcing raw materials from higher-risk regions. The Company undertakes activities aimed at **limiting potential environmental and social impact** – among other things through the systematic verification of suppliers and the implementation of practices consistent with ESG assumptions.

Since 2023 Bielenda Group has been gradually implementing the **Supplier Code of Conduct**, which sets out standards in the area of respect for human rights, ethics, environmental protection and compliance with legal provisions.

Bielenda Group verifies its Suppliers and Subcontractors from an ESG perspective, covering environmental, ethical and social aspects. Verification takes place by means of questionnaires and/or ESG audits.

ESG verification

95%

of strategic suppliers verified from an ESG perspective

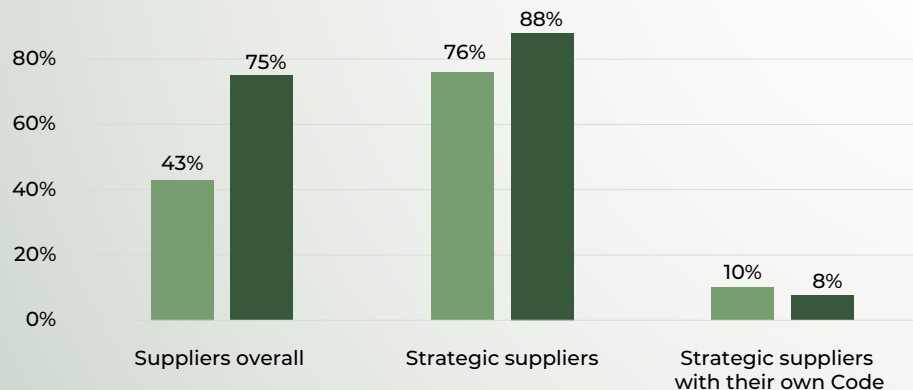
100%

of subcontractors verified from an ESG perspective

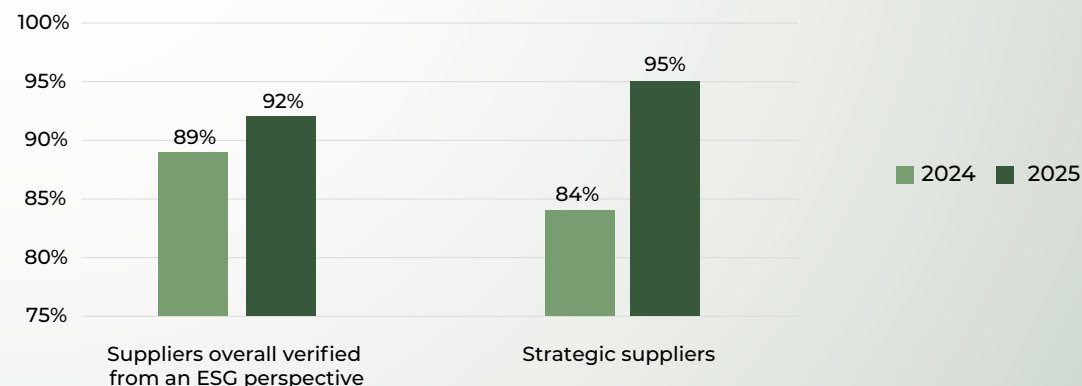
7 audits

were conducted in order to verify suppliers from an ESG perspective

Share of suppliers covered
by the Supplier Code of Conduct



Percentage distribution of suppliers
verified from an ESG perspective



G1-6 – Payment practices

Bielenda Group attaches particular importance to the timely settlement of payments, including for the SME sector, in accordance with the Act on counteracting excessive delays in commercial transactions. An Accounting Policy is in force within the organization, the purpose of which is to ensure a transparent, coherent and correct flow of documents. The payment terms set out in contracts do not exceed 90 days. In the case of several suppliers holding the status of a large enterprise, a term of 120 days has been adopted. In 2025 Bielenda Group was not a party to court proceedings associated with delays in payments.

Local partnerships and volunteering activities

In 2025 the Company also established several local partnerships and undertook volunteering activities, such as:

- ✔ a collection of donations in the form of art supplies, toys and educational aids, which went to the Special School and Educational Center in Kąty Wrocławskie,
- ✔ a collection of electronic waste combined with an exchange of tree seedlings,
- ✔ joining the initiative of the local authorities in Kąty Wrocławskie under the slogan “Entrepreneurship is a woman”,
- ✔ a collection for animal shelters,
- ✔ product support for the Rakiety Oncology Foundation,
- ✔ donation of Bielenda products to the Juliusz Słowacki Theatre in Kraków,
- ✔ product support within the project “Women Know What They Are Doing in Kraków” with Agora Publishing, under the patronage of Wysokie Obcasy Extra,

- ✔ cooperation using Bielenda gift sets on the occasion of the conference “New possibilities in rehabilitation” organized by the St Louis Provincial Specialist Children’s Hospital in Kraków,
- ✔ donation of Bielenda products to the Toruń Center for Social Services within a conference of the psychological aid program for children and young people in Toruń education.

For several years Bielenda Group has cooperated with the Rakiety Oncology Foundation. The organization supports people suffering from cancer and their loved ones, providing psychological, psycho-oncological, psychiatric and dietetic help. It also helps with the everyday support of patients and their families.

On 5 October, at our Bielenda Professional & SKINARTÉ Proesthetic Academy event, which took place in Kraków, we hosted the Rakiety foundation. At the Foundation’s stand, topics were raised concerning the importance of regularly examining one’s own health.



The Rakiety foundation on
Bielenda Professional & SKINARTÉ Proesthetic Academy event

Speakers also taught self-examination on phantoms, reminded participants of the importance of preventive examinations and encouraged them to pay attention to the signals our body sends us.



As part of the #MotherhoodMyWay (#MacierzyństwoPoMojemu) campaign, we draw attention to the importance of balance between motherhood, work and the fulfillment of professional ambitions. Video available at the link: <https://www.youtube.com/watch?v=nwq49ErfZFo>



A collection of donations in the form of art supplies, toys, and educational aids, provided to the Special School and Educational Center in Kąty Wrocławskie.



As we close this year's report, I would like to thank all those involved in developing and implementing ESG activities – for their professionalism, cooperation and consistency, thanks to which we effectively respond to stakeholder expectations and adapt to dynamically changing regulations. Managing the ESG area remains a process of continuous improvement, requiring flexibility, the courage to embrace change and the ability to make decisions under conditions of uncertainty.

In the face of growing social expectations, new legal obligations and rapidly advancing transformation, every day we face challenges that strengthen our responsibility and resilience. We go through them – sometimes under pressure, but always with a clearly defined direction and the conviction that every change matters.

Together, we continue the development of Bielenda Group in a spirit of transparency, responsibility and care for future generations. Every action undertaken strengthens our organization and reinforces its readiness to meet the challenges of the years to come.

PATRYCJA ZAMORSKA,
Head of ESG

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