

SPADEL'S CSR POLICY



NON-FINANCIAL INFORMATION

The chapters "Internal Control and Risk Management" and "Risk Factors" of the 2018 Annual Report describe Spadel's exposure to risks and the management systems applied. These include the following risks:

- questions about the environmental impact of our products;
- defects or contamination of a product marketed by the Group;
- the availability and price volatility of raw materials and energy;
- the development of fees on different types of packaging.

In the specific context of non-financial disclosure Spadel applies the Global Reporting Standards (GRI). The materiality analysis helps to identify the main risks and issues that concern Spadel regarding the social, environmental and ethical aspects of its activities. These risks are then integrated into the CSR strategy and the CSR governance systems. The scope covers the company's entire value chain, including suppliers and partners as well as different customers (mass retail, out-of-home consumption, etc.) and end consumers.

This materiality exercise is repeated regularly. A first major analysis took place in 2010, followed by an update in 2015. We tested our CSR strategy with internal and external stakeholders again this year, and the packaging challenges and risks were transposed into a separate strategy. A new in-depth materiality analysis will be launched in 2019, with a view to a 2025-2030 CSR strategy. Since 2015, Spadel's societal challenges have revolved around a central objective called "Natural hydration for a healthy tomorrow". The CSR strategy is based on three pillars: acting together, protecting nature and healthy refreshments. The risks, actions and specific results are explained in this report under the respective themes.

CORPORATE SOCIAL RESPONSIBILITY

Sustainable development is in our genes

We have been reinforcing sustainability within the Spadel Group in a structural way since 2010. We are delighted to present our CSR ambitions and where we stand today.



SPADEL'S SUSTAINABLE DEVELOPMENT POLICY HAS BEEN BUILT AROUND A CENTRAL OBJECTIVE SINCE 2015: "NATURAL HYDRATION FOR A HEALTHY TOMORROW"

CSR Governance

We pay constant attention to the efficient and effective organisation of our sustainability policy. CSR governance is based on the following bodies and functions.

The CSR Steering Committee

- This committee is composed of the CSR Manager, the CSR Project Manager, the local CSR Coordinators, the CSR Platform Managers and an external sustainability specialist. It meets 4 times a year.
- It defines sustainability goals, monitors progress and decides in case of investment decisions and dilemmas.

• The CSR Platform Managers

- Each Spadel employee can contribute to the sustainability strategy. Following the evaluation and revision of our strategy in 2015, we launched a call to all workers and asked who wanted to be a project manager or join the project group of one of the platforms. Interested people were invited to write a letter of motivation. This way, we succeeded in promoting and reinforcing Spadel's culture of sustainability.
- The CSR platforms are therefore managed by managers from different departments (purchasing, operations, HR, etc.). These managers play an active role in the CSR Steering Committee. They assume responsibility and propose actions that contribute to the achievement of sustainability objectives.

• The CSR Platform Sponsors

- Each platform is "sponsored" by a member of the executive committee (Comex).
- This mentor simplifies the work of the platform manager, guides the project and facilitates decision-making.

• The CSR Manager and CSR Project Manager

- These functions are located at the Spadel Group level and directly report to the CEO.
- These managers are responsible for developing the sustainability strategy and its components, including packaging.
- They coordinate and monitor the annual CSR action plan while providing support and assistance to the sustainability platforms and local CSR coordinators.
- They themselves run one or more sustainability platforms.
- They organise internal and external stakeholder dialogues as well as external partnerships.
- They coordinate the internal and external sustainability communication.

• The local CSR Coordinator

 Each market has a local CSR Coordinator who converts the strategy into a local action plan and represents the local affiliate to stakeholders.

Our Stakeholders

2018 was heavily dominated by the development of a new sustainable packaging strategy. Our stakeholders had a major say in this process.

An extensive survey, including a qualitative phase and a quantitative phase, was conducted among consumers.

It surveyed the consumers' perceptions with regard to sustainability (including packaging) in each of our markets. For the development of a new packaging strategy, a draft version was presented to 42 stakeholders in 5 countries: Belgium, the Netherlands, the United Kingdom, France and Bulgaria. These stakeholders were selected on the basis of a balanced breakdown across the entire chain and in our commercial markets:

- EPR governing bodies (extended producer responsibility);
- distribution clients;
- out-of-home clients;
- suppliers;
- waste treatment/recycling centres;
- policy makers;
- Environmental NGOs;
- experts.



An individual interview was organised with each of these stakeholders. The packaging strategy was refined and finalised on the basis of the results of this extensive stakeholder consultation.

The focus was not only on our external stakeholders. An exercise focused on internal stakeholders was also launched in late 2018. The objective? To better ascertain internal CSR expectations in order to better organise our CSR governance and adapt it to other parts of the organisation. The results of this exercise will be applied in 2019.

Collaboration is essential to achieve the goals of our new packaging strategy. In the years to come, we will therefore take the lead and actively collaborate with commercial partners, knowledge partners, governments and civil society organisations.



Our responsibility (materiality)

A relevant sustainability strategy is never final, but it is constantly evolving.

Spadel began with a structured approach to sustainable development in 2010. Our first sustainability strategy was developed following a detailed materiality analysis including background studies, extensive management interviews and stakeholder validation.

Given the rapidly changing context, this sustainability strategy was revised in 2016. We have revalidated and calibrated the materiality in collaboration with an external party, the CSR Competence Centre of the Antwerp Management School, to give rise to a complete and renewed CSR 2020 strategy, structured around 11 pillars.

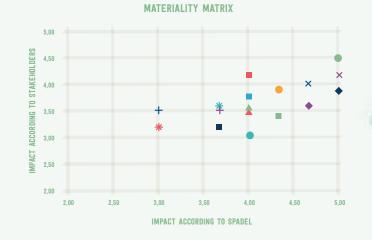
In 2018, we again conducted a limited materiality analysis, pending an in-depth 2025-2030 reflection.

Several stakeholders (a sectoral organisation, a distribution client, an out-of-home client, a supplier, an NGO) were invited to evaluate Spadel's impact on the topic in question. The results broadly confirm our current strategy. Some topics not explicitly included in the 2020 CSR strategy were also mentioned:

- A "Health & Safety of employees" policy is part of our "Great Place to Work" pillar and each factory has its own management system.
- The new sustainable packaging strategy, which was not yet public at the time of this consultation, sets "circular economy" objectives.
- Other topics were also highlighted such as Spadel's crisis management (for example, in case of contamination of products), the management of water resources in case of severe drought and the management of contracts with local authorities on the use of the water springs. These aspects are included in our policy relating to the precautionary principle (see p55 in Annual Report).

The Bulgarian company Devin joined the Spadel Group in 2017, which has extended the scope of this report compared to previous reporting. It is systematically indicated whether the figures also concern Devin or not, which allows our reports to be compared over time.

A new in-depth review of our strategy will begin in 2019 with a view to 2025. Our sustainable packaging strategy for 2025 already partially puts it into effect.



Employee engagement
 X Healthy drinks (low / no calories)

▲ Sustainable purchasing

+ Wellbeing at work

Material usage

Litter (déchets sauvages, zwerfvuil)

Pure material (no contaminants)

* Internal mobility of employees

- Carbon emissions
 Energy
 Hydration (sensitising wider public)
 Logistics (road safety, emissions, ...)
 Natural ingredients
 Social dialogue
 Health & safety of employees
- Water caption / stress
- Biodiversity



Sustainable Development Goals

In September 2015, the Sustainable Development Goals (SDGs) were formally adopted by the UN General Assembly with the 2030 Agenda for Sustainable Development. Via its CSR strategy, Spadel contributes to achieving several of these Sustainable Development Goals.



2020 CSR Strategy, overview of the pillars

Acting together Sustainability in everyone's job

- TThe review of the sustainability strategy in 2015 demonstrated that, despite the major results already achieved, sustainable development remained a highly technical subject with a strong focus on reducing CO₂ emissions. The other topics were pushed back to the second plan. Translating sustainability into commercial value and creating a culture of sustainability throughout the organisation also represented major challenges.
- We therefore decided to give the 2020 strategy a pillar entitled "Sustainability in everyone's job". Establishing a culture of sustainability across the organisation is only possible if each employee understands what sustainable development involves at the Spadel company level and at the level of their personal role. In this context, priority is given to sales, marketing and purchasing roles in each of our markets.
- 2018 status

A baseline measure was completed as part of the Great place to Work survey sent to the entire organisation. Four questions were asked. Here are the results at the Spadel Group level.

- $\circ~$ I understand what sustainability means for Spadel: 76%
- $\circ~$ I understand what sustainability means for my work: 75%
- I can put sustainability into practice in my work: 67%
- Do you feel encouraged to participate in sustainability activities?: 65%
- The results of this benchmark will form the basis for further initiatives in the next two years. Lunch & Learn sessions have already provided basic training on sustainability and CSR at each site.

→ 2019 outlook

- In 2019, we are planning specific training focused on sustainable development and packaging strategy which will be organised for sales, marketing and purchasing in each country.
- CSR will also be included in the New Worker Integration Programme.

Acting together One Citizen Day per employee

- A second initiative to create a culture of sustainability in the organisation is to support volunteer work. The objective is that each worker participates in an activity closely related to Spadel's core business and for the benefit of society on one workday a year.
- 2018 status
- A second successful edition was held in Brussels. Workers had the choice between 5 projects: 2 projects focused on waste collection and 3 projects focused on the maintenance, painting and decoration of health & wellbeing centres for young people and adults. 65% of our Brussels colleagues took part. This edition was a success, as evidenced by the high feedback score.
- A first edition was organised at Spa Monopole and Bru: 32% of workers participated in the "Big Spring Clean" (Grand Nettoyage de Printemps). Although the 50% participation goal was not achieved, this encouraging first edition helped to collect a lot of waste.
- The first edition planned this year in Made (Netherlands) was postponed to 2019 due to the restructuring of the commercial services and marketing departments.

→ 2019 outlook

 The One Citizen Day will continue in Brussels and will be extended to our other sites, with a first edition in the Netherlands, at Carola and Wattwiller in France and at Brecon Carreg in the United Kingdom.

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Acting together To Be a Best Workplace

 Spadel wants all its subsidiaries to offer a pleasant workplace. (This point is also discussed on page 15 of the 2018 Annual Report.)

In 2018, Spadel once again organised a group-wide survey to measure and analyse worker satisfaction. We achieved a very high participation rate: 94% of employees made their voices heard.

70 to 75% of Spadel workers describe the company as a "Great Place to Work". There are some small local differences: in the Netherlands, a recent restructuring had a slight negative impact on the results, while in Bulgaria, the first edition of the survey yielded very satisfactory results. France has already obtained the Great Place to Work label, even though the target had been set for 2020.

Spadel will continue to deploy its action plans to obtain the Great Place to Work certification for all Group entities by 2020. We want to be part of the top 10 "Best Workplaces".



Protecting Nature Sustainable packaging

- The use of packaging, and in particular plastic packaging, is without a doubt one of the major challenges that Spadel will have to face in the coming years. Like many citizens, Spadel shares the concern to preserve our nature for future generations. Last year, we developed an ambitious sustainable packaging strategy in the following context:
- We focused our attention on the challenge and examined it from four angles: the policy framework, the consumer's vision, the consultation of stakeholders in our value chain and the identification of the market context;
- Our ambition to be a market leader in sustainable packaging is in line with Spadel's DNA and vision. After all, nature and sustainability form the basis of who we are, as illustrated by our sustainability strategy: Natural hydration, Healthy tomorrow!
- The ambition of our new 2025 packaging strategy is to be healthy for people and the environment, as well as fully circular.
- It has been translated into 10 concrete commitments in the areas of product design, packaging production, collection and recycling, and litter prevention and clean up.
- Collaboration is essential to achieving these objectives. We will take the lead and actively collaborate with business partners, academic partners, governments and civil society organisations.
- To prevent and clean up litter, we already established a global strategic partnership with Sea Cleaners, an organisation that fights plastic pollution in the oceans. We are also in the process of concluding partnerships with local authorities and organisations in all our markets.

→ 2019 outlook

- We anticipate an extensive communication plan in order to explain our objectives to our internal and external stakeholders.
- We will also put in place concrete governance structures and will launch projects to put the strategy into practice.



Run Refuel Recycle Team Brecon Carreg

Protecting Nature 80% sustainable suppliers

(Please note that these numbers do not include Devin.)

- Spadel carries out 100% of its activities in Europe, in accordance with strict laws and regulations. These apply to both employees and clients. The risk of not respecting or violating human rights is significantly higher in the supply chain. The main concerns are child labour, forced labour, working time and wages, discrimination, freedom of association and health and safety.
- By focusing on local purchases, Spadel reduces its exposure to risks inherent to the supply chain. In 2018, 100% of purchases (ingredients for flavoured water and lemonades, packaging materials, etc.) were made within 500 km of production sites in Belgium.
- Spadel:
- Participates in EcoVadis and as such manages human rights related risks. At the last audit in 2017, Spadel received the "Gold" rating: the audit found no risk to freedom of association and collective bargaining, incidents of child labour, forced labour, or compulsory work;
- An internal code of conduct was developed in 2017 that also explicitly addresses the topic of corruption.
- Spadel also asks all its suppliers to sign the Spadel Sustainable Procurement Policy (SSPP), which lists the minimum expectations regarding ethical, environmental and social efforts (child labour, discrimination, working hours, etc.). Spadel may terminate a contract if the supplier does not genuinely engage in this regard.
- Finally, Spadel asks strategic suppliers to participate in EcoVadis, which, as a third party, evaluates the efforts made by these suppliers in the field of sustainable development. A score is calculated for each supplier based on 21 criteria. This assessment focuses on the environment, social conditions (including human rights issues such as child labour,

forced labour, etc.), ethics (e.g. corruption) and sustainable purchasing (sustainable approach within one's own chain). Each strategic supplier conducts the EcoVadis audit every two years and receives an action plan to improve.

- Strategic suppliers meet at least one of the following criteria:
- they are the only suppliers in their category;
- the purchase budget exceeds €500,000 per year;
- their products come into direct contact with water or lemonade;
- they have the BRC Global Standard for Food Safety certification.
- 3 KPIs consistent with the objective have been established for monitoring suppliers:
- the number of suppliers having signed the Spadel Sustainable Procurement Policy (target = 90%);
- the number of suppliers that have been the subject of an EcoVadis audit (target = 80%);
- the number of suppliers who received the "under control" rating as part of this EcoVadis audit.

- In 2018, Spadel had 44 strategic suppliers.
 - Of these, 92% signed the Spadel Sustainable Procurement Policy (target of 90% achieved).
- Among the 36 existing suppliers:
- 34 carried out their EcoVadis audit (= 94%, target of 80% achieved);
- none were in the "high risk" area. In total, 82% of them scored "under control". This is a significant improvement over 2016 (63%) and 2014 (38%);
- the other 2 existing suppliers who did not obtain an EcoVadis score signed the SSPP.
- The 8 new strategic suppliers were invited to submit to the EcoVadis audit. We are still waiting for the results.

→ 2019 outlook

- Spadel will continue its efforts to make the chain more sustainable by developing action plans for existing and future strategic suppliers.
- We are participating in the Green Deal circular purchasing initiative by the Flemish government, with the aim of integrating sustainability criteria into our purchasing process.

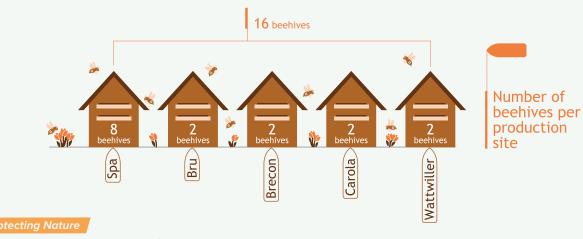


Protecting Nature 100% bee-friendly

- Spadel aims to be the reference in sustainable management of natural water sources. Biodiversity efforts help maintain healthy and natural water collection areas.
- Since 2012, Spa Monopole has been supporting the European project LIFE + "Ardenne liégeoise" for the restoration of natural and semi-natural habitats that cover the Ardenne highlands. This project has been extended until the end of 2019.
- Black grouse were released in the Hautes Fagnes in 2017 and 2018. The grouse is known for its high biodiversity value. It is indeed an "umbrella species": if the habitat of the grouse is protected, many other animal and plant species of the same environment will also benefit. An emblematic species of the Fagnes, the grouse thus helps protect our local biodiversity. This project is supervised by the University of Liège and the Royal Belgian Institute of Natural Sciences and supported by WWF, Spa ® and Pairi Daiza.
- Spadel is working with BeeOdiversity to measure biodiversity and the effectiveness of protection measures at the sites. Together, we have established bee colonies in the Spadel water collection areas. BeeOdiversity analyses the pollen they collect. It examines 22 indicators, including the quality of biodiversity, the quantity, diversity and quality of pollen, bee health and the quality of the environment. For this last indicator, more than 500 different parameters are controlled, which makes it possible to detect any contamination.
- In 2018, 16 beehives were set up on different Spadel sites.

→ 2019 outlook

- Hives to be set up in the Rhodope Mountains, on the Devin site in Bulgaria.
- Spadel plans to create a European label for biodiversity with BeeOdiversity.



"Gold" European Water Stewardship

- Current climate change is already having a major impact on water availability, supply and preservation worldwide. Sometimes due to heavy rain, sometimes due to water shortages. This is not currently a problem in the regions where the Spadel Group is active. Spadel extracts only a fraction of the amount of water that falls each year into the collection areas. The water is drawn without being depleted and each site has the necessary tools for monitoring: we use the WEI water exploitation index, which indicates the ratio between the average annual abstraction and the average annual water available in a given region. The springs of Spa, Bru and Brecon have a WEI less than 4%; a figure well below the 10% threshold set by the European Environment Agency (EEA). We also apply the principle of "draw without depleting" to other springs (France and Bulgaria). We are currently working on scientific data that maps the infiltration areas of these springs, so we can calculate the exact WEI.
- The first law protecting natural areas where mineral water is extracted dates back to 1772. The first protection zone around the Spa springs was created in 1889: a first in Europe. Today, Spadel protects a total of 30,750 hectares of nature reserves (including Devin). The Spa water protection zone alone covers 13,177 hectares (= 26,000)

football pitches). 1,343 hectares of the water protection zone is a Natura 2000 zone. Bru springs (4,258 hectares) are also part of a water protection zone, as are those of Devin (4,515 hectares). The Brecon site (8,800 hectares, Brecon Beacons National Park) and the springs in France are part of protected national and regional parks (Ballons des Vosges Natural Park, totalling 292,100 hectares).

- In 2018, the Spa Monopole site received the highest rating (Gold) of the "European Water Stewardship" (EWS) certification system for the third time. The other Spadel Group sites are in the preparatory phase. Initially, we also wanted to have Devin audited in 2018, but we decided to postpone it until 2019, pending the merger of the European Water Stewardship and the Alliance for Water Stewardship (AWS).
- Hygiene legislation in the food sector limits the possibilities for recycling water at production sites. Nevertheless, in 2018, we were able to reuse 6% of the water consumed for the cooling of the pumps and the cleaning of the production lines. This represents 57,459 m³.

→ 2019 outlook

- We look forward to the certification of Spa Monopole and Devin via the new AWS method
- We are preparing the audit of other sites.

Protecting Nature Water use ratio 1.6 I/I

- This data was verified externally by EY: see pages 12-13.
- In recent years, Spadel has not relaxed its efforts to reduce its water footprint. The company measures the results using the Water Use Ratio (WUR). Monitoring is ongoing and is part of the Operations dashboard so that measures can be taken quickly in the event of a discrepancy.
- In 2018, the average production of one litre of mineral water and lemonade required 1.58 litres, which gives a Water Use Ratio of 1.58 I/I. Between 2010 and 2018, Spadel managed to reduce the WUR by 54% per litre.
- We have already achieved our goal: a 1.6 I/I WUR by 2020. These figures are somewhat positively influenced by the arrival of Devin (a large volume of mineral water) to the Spadel Group in 2017. Without Devin, the 2018 WUR is 1.68 I/I, which is still better than the target of 1.72.

→ 2019 outlook

• We are continuing our efforts to further reduce this ratio.



Protecting Nature Carbon

- This data has been verified externally by EY: see pages 12-13.
- Scientists are unanimous: climate change is largely due to carbon emissions from human activities. One of the solutions is to significantly reduce our carbon footprint. For Spadel, this implies, in order of impact on the carbon footprint: work on packaging, transport, energy consumption, etc.
- Spadel is currently in a transition period when it comes to calculating its carbon footprint. The previous calculation method, applied since 2010, shows a further decrease in our carbon footprint in 2018.

These figures are presented again with a view to comparison with previous years. These figures exclude Devin and cooling in the consumer phase.

- In 2018, the total carbon footprint of the Spadel Group was 105,878 tonnes of CO₂-eq. With a ratio of 157 eq. CO₂/litre, Spadel achieved a decrease of 26% compared to 2010. This systematic reduction is the result of numerous efforts in the field of energy consumption, packaging and transport.
- Energy: The Spadel Group (excluding Devin) revealed a total energy consumption of 88,029 MWh in 2018, of which 42% was renewable energy. Despite a 31% increase in sales, Spadel reduced its energy consumption by 6% compared to 2010.
- With regard to Scope 1 and Scope 2, all Spadel European sites are CO₂ neutral, which earned the company the CO₂Logic and Vincotte label.
- Spadel aims for carbon neutrality for the entire Group and its activities, including Scope 3, by 2020, and we are on the right track.
- The second new calculation method follows the guidelines of the Product Environmental Footprint (PEF, see below).
 In the future, Spadel will rely on this method of calculation and include Devin's performance.

• Status 2018:

- Spadel is one of the 9 Belgian companies participating in the Science Based targets initiative (keeping global warming below 2 °C). We submitted our file for reducing net CO₂ emissions by 42% by 2030 (compared to 2015) and achieving the net zero emissions target by 2050.
- Spadel is also the first European company to apply the PEF methodology to its entire product range, with an environmental score for all its products.
- Spadel is the first company to compare the environmental performance of uGS with the European representative product (-30% for pet products).
- Spadel is the first company to commit to reducing its ecological footprint according to the PEF by 2030 (> 60%) on the basis of a specific and realistic plan.
- The PEF, an initiative of the European Commission, is a multi-criteria methodology for measuring the environmental performance of a good or service throughout its life cycle. The PEF method harmonises calculations and ensures a better comparison of products in Europe. It aims to reduce the environmental impact of goods and services.
- Spadel's bottled water category includes 16 indicators. The CO₂ footprint is only one of these criteria.
- Our 10-year carbon offset project in Rwanda began in 2018, in collaboration with local partner Water Access Rwanda and Belgian partner CO₂Logic. We will invest in the restoration of water wells there. Clean water reduces to need to boil (and the use of fossil fuels, source of CO₂) water to make it safe for drinking.

Healthy refreshments

Promotion of hydration

- When establishing partnerships, Spadel chooses to maintain the link with its core business. The topic of hydration is a good illustration of this approach.
- In collaboration with the University of Ghent, Spadel conducted a study on the hydration of children (primary school) in Belgium. According to the results of the study, 75% of children are not sufficiently hydrated when they arrive at school, 53% remain poorly hydrated all day and only 8% of children like to go to the toilet.
- As part of this challenge, cooperation with GoodPlanet continued in Belgian schools. In the Netherlands, Spadel works in partnership with JOGG (Jongeren Op Gezond Gewicht) and in Wales we participate in the National Hydration Council.

Healthy refreshments

100% natural and low-calorie drinks

- The composition of Spadel lemonade and flavoured water has an impact on the health of its customers. We are therefore constantly striving to reduce the caloric intake of our drinks. The average content of our flavoured water and lemonade was 11.4 kcal/100 ml in 2018.
- Spadel and its stakeholders jointly developed a framework for natural products. The objective: to integrate 100% natural products to the entire range by 2020. Spadel achieved this goal in 2018.

GRI TABEL | TOPIC SPECIFIC DISCLOSURES LINKED TO CSR STRATEGY

CSR PLATFORM	GRI DISCLOSURE	SUBJECT	UNIT	DATA 2017	DATA 2018
Sustainability in everyone's job	404-2	Number of trainings on sustainability for the employees of the Group Spadel.	#	12	7
1 citizen day per employee	413-1	Number of participants from the Group Spadel to the citizen days.	#	41	94
To be a best workplace		Trust Index score for the Group Spadel, according to the Great Place to Work questionnaire.	%	1	64
80% sustainable suppliers	308-2	Evaluation of strategic suppliers (EcoVadis)	%	61	94
Water-use ratio 1,6 l/l	303-3	water-use ratio	litre/litre	1,63 (incl. Devin)	1,58 (incl. Devin)
	305-4	GHG emissions intensity	g CO2-eq/litre	160 (excl. Devin)	157 (excl. Devin)
Carbon neutral	305-5	carbon footprint reduction	%	-24 (excl. Devin)	-26 (excl. Devin)
100% natural & low	416-1	Average calorie content of flavoured waters and lemonades	kcal/100 ml	14,8	11,4
caloric drinks	416-1	Products according to Spadel naturality framework	%	100	100

CSR Report



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Rapport d'assurance limitée de l'auditeur indépendant

Aux actionnaires de Spadel SA

Nous avons effectué une mission de certification visant à fournir une assurance limitée sur des indicateurs sélectionnés dans le chapitre « La politique RSE de Spadel » (ci-après: le rapport RSE) dans le rapport annuel 2018 de Spadel SA (ci-après: Spadel) pour l'exercice clôturé le 31 décembre 2018.

Notre rapport a été préparé conformément aux conditions énoncées dans la lettre de mission du 19 février 2019.

Nous avons effectué notre mission d'assurance en ce qui concerne les indicateurs sélectionnés conformément à la norme internationale ISAE 3000 « Missions de certification autres que les missions d'audit ou d'examen d'informations financières historiques ». Nos responsabilités sur cette base sont décrites dans la section « Responsibilités de l'auditeur indépendant ». Nous estimons que les éléments probants recueillis sont suffisants et appropriés pour fonder notre conclusion.

Notre indépendance et contrôle de qualité

Nous avons respecté les règles d'indépendance et les autres règles d'éthique du Code of Ethics for Professional Accountants émis par l'international Ethics Standards Boards for Accountants (IESBA). Celles-ci se basent sur les principes fondamentaux d'intégrité, d'objectivité, de compétence professionnelle et de vigilance, de confidentialité et de conduite professionnelle. Nous avons appliqué l'international Standard on Quality Control (ISQC) n°1 et maintenu un système élaboré de contrôle de qualité, y inclus des politiques et procédures documentées concernant les règles d'éthique, les normes professionnelles et les dispositions légales et règlementaires applicables.

Etendue de notre mission

L'objectif de notre mission est de confirmer l'absence d'anomalies significatives de nature à remettre en cause le fait que les indicateurs sélectionnés sont présentés de manière fidèle, conformément aux principes de reporting de Spadel et aux sections correspondantes de la norme GRI (Global Reporting Initiative). Les indicateurs sélectionnés comprennent les indicateurs non financiers concernant l'utilisation de l'eau (GRI 303-3) et les émissions de CO₂ (GRI 305-1, 305-2, 305-3), 305-4).

Limites de l'étendue de notre mission

Dans le contexte de la présente mission, nous n'avons pas effectué de travaux d'assurance concernant les autres informations contenues dans le rapport RSE. De plus, nous ne donnons aucune assurance quant aux informations futures telles qu'elles figurent dans le rapport RSE.

Responsabilités de l'organe de gestion

L'organe de gestion est responsable de l'établissement des indicateurs conformément aux principes de reporting interne de Spadel et aux sections correspondantes de la norme GRI (Global Reporting Initiative). L'organe de gestion est également responsable de la mise en place d'un contrôle interne adéquat pour permettre la préparation du rapport RSE ne comportant pas d'anomalies significatives, que celles-ci proviennent de fraudes ou résultent d'erreurs.

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Responsabilités de l'auditeur indépendant

Notre responsabilité en tant qu'auditeur indépendant consiste à planifier et à exécuter une mission d'assurance de manière à obtenir des documents de support suffisants et appropriés afin de formuler notre conclusion. Nous utilisons un système cohérent de contrôle de la qualité comprenant des directives et des procédures établies dans le respect des exigences éthiques, des normes d'audit et des autres lois et réglementations applicables.

Des écarts peuvent survenir à la suite de fraudes ou d'erreurs et sont considérés comme importants si on peut raisonnabilement s'attendre à ce qu'ils, individuellement ou collectivement, puissent influer sur les décisions que les utilisateurs prennent en fonction des indicateurs. L'importance relative a une influence sur la nature, le calendrier et l'ampleur de nos travaux, et l'évaluation de l'effet des écarts constatés influe sur notre conclusion.

Nous avons effectué cette évaluation de manière professionnelle et critique et, le cas échéant, exercé notre jupement professionnel conformément aux exigences de la norme ISAE 3000 « Missions de certification autres que les missions d'audit ou d'examen d'informations financières historiques a , en matière d'éthique et d'indépendance.

La mission d'assurance vise à obtenir un degré d'assurance limité. Le travail effectué pour une mission avec un degré de certitude limité est de nature et de calendrier différents et de portée moindre que pour les missions visant à obtenir un degré de certitude raisonnable. En conséquence, le niveau d'assurance obtenu avec une mission avec un degré d'assurance limité est considérablement inférieur à celui d'une mission réalisée avec un degré d'assurance raisonnable.

Nos principaux travaux ont consisté à:

- évaluer l'acceptabilité des méthodes de calculs utilisées et leur application cohérente, ainsi que celle des estimations;
- obtenir un aperçu de la conception et de l'existence des systèmes et des méthodes utilisés pour collecter et traiter les données qui servent de base à la responsabilisation;
- effectuer des travaux liés à la justification des indicateurs sélectionnés, principalement en combinant des procédures analytiques et la collecte d'informations;
- mener des entretiens avec les employés concernés chargés de fournir les informations, d'effectuer les contrôles internes sur les données et de consolider les données incluses dans le rapport;
- évaluer la documentation interne et externe, en plus des entretiens, pour déterminer si les informations contenues dans la justification sont suffisamment étayées;
- évaluer de manière analytique les données et les tendances fournies pour les indicateurs sélectionnés soumis à la consolidation.



Notre conclusion

Sur la base de nos travaux et compte tenu des limites énoncées dans la section « Limites d'étendue de notre mission », nous n'avons pas relevé d'anomalies significatives de nature à remêttre en cause le fait que les indicateurs sont présentés de manière lidèle, conformément aux principes de reporting de Spadel et aux sections correspondantes de la norme CRI (Global Reporting Initiative).

Restriction sur l'utilisation et la distribution de notre rapport

Notre rapport est uniquement destiné à l'usage de Spadel dans le cadre du rapport RSE pour l'exercice qui termine le 31 décembre 2018 et ne peux être utilisé à d'autres fins. Nous n'acceptons aucune responsabilité ou obligation pour dommage à l'égard de tiers pour ce rapport ou les conclusions faites dans celui-ci.

Diegem, 29 avril 2019

Ernst & Young, Réviseurs d'Entreprises SCRL Commissaire Représentée par

weld blow -

Romuald Bilem* Associé * Agissant au nom d'une SPRL

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GRI Table

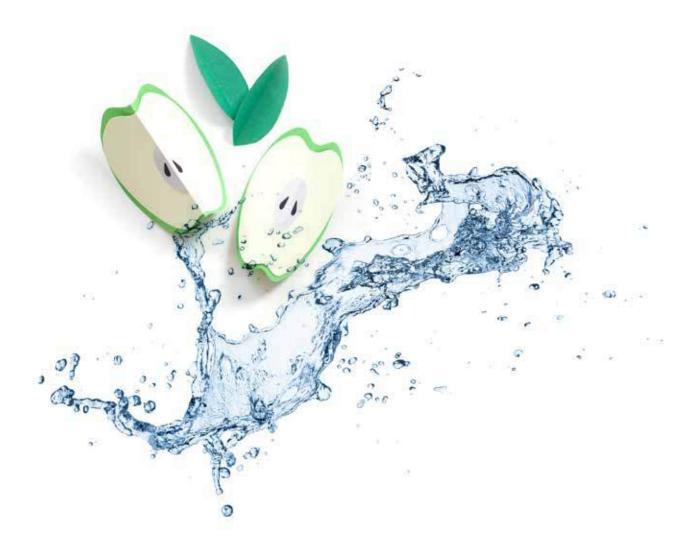
CSR PLATFORM	GRI DISCLOSURE	SUBJECT	UNIT	DATA 2017	DATA 2018	MORE INFORMATION
General Disclosures						
	102-1	Organization profile				Cf. p. 10 of the 2018 annual report
	102-2	Activities, brands, products, and services				Cf. p. 10, 24-25 of the 2018 annual report
	102-3	Location of headquarters				Avenue des Communautés, 110 - B-1200 Brussels
	102-4	Location of operations				Cf. p. 26, 27 of the 2018 annual report
	102-5	Ownership and legal form				Cf. p. 55 of the 2018 annual report
	102-6	Markets served				Cf. p. 24-35 of the 2018 annual report
	102-7	Scale of the organization				Cf. p. 4-5 of the 2018 annual report
	102-8	Information on employees and other workers				Cf. p. 4, 27 of the 2018 annual report
	102-9	Supply chain				Cf. p. 8
	102-10	Significant changes to the organization and its suppl chain	У			The Bulgarian company Devin joined the Spadel Group in 2017, extending the scope of this report. It is systematically indicated whether the figures also concern Devin or not, which allows for a comparison of our reports over time.
	102-11	Precautionary Principle or approach				See p. 55 of the 2018 Annual Report for Risk Management; cf. p. 2 for non-financial information
	102-12	External initiatives				 Belgium Spadel is a partner of the European project "Life Ardenne Liégeoise", which aims to revalue the natural sites of the Haute Ardenne. Spadel adheres to the Belgian Pledge, a commitment to responsible advertising practices by food companies. Spadel is a founding partner of GoodPlanet Belgium. Netherlands In the Netherlands, Spadel signed the "Gezonde voeding op scholen" agreement, an initiative of the Voedingscentrum and JOGG. United Kingdom - Wales Brecon Mineral Water signed the Welsh Government's Sustainable Development Charter. Partnership with Run 4 Wales and Recycle for Wales. France Carola is an active member of Idée Alsace, a local network of companies promoting sustainable development. Carola and Wattwiller are among the first French SMEs to have been labelled
	102-13	Membership of associations				"Entrepreneurs + Engagés". Cf. Disclosure 102-12
	102-14	Statement from senior decision-maker				Foreword by the CEO: vision, values, ambition and leadership, commitments and key priorities. Cf. p. 8-9 of the 2018 annual report

CSR PLATFORM	GRI DISCLOSURE	SUBJECT	UNIT	DATA 2017	DATA 2018	MORE INFORMATION
	102-16	Values, principles, standards, and norms of behavior				Cf. p. 16-23 of the 2018 annual report
	102-18	Governance structure				Cf. p. 3
	102-40	List of stakeholder groups				Cf. p. 3-5
	102-41	Collective bargaining agreements				In Belgium, all workers belong to a CBA
	102-42	Identifying and selecting stakeholders				Cf. p. 3-5
	102-43	Approach to stakeholder engagement				Cf. p. 3-5
	102-44	Key topics and concers raised by stakeholders				Cf. p. 3-5
	102-45	Entities included in the consolidated financial statements				Cf. p. 65 of the 2018 annual report
	102-46	Defining report content and topic Boundaries				Cf. p. 2, 4-5
	102-47	List of material topics				Cf. p. 5
	102-48	Restatements of information				See section "Our responsibility" and "Carbon" section for more information on the new calcula- tion of CO2 according to the European PE F (Product Environment Footprint) method.
	102-49	Changes in reporting				Cf. p. 2, 4-5
	102-50	Reporting period				1 January 2018-31 December 2018
	102-51	Date of most recent report				1 October 2017, the previous report is still available at www.sustainabilityspadel.com.
	102-52	Reporting cycle				Annual updating of core data, a permanent update of actions and progress during the year.
	102-53	Contact point for questions regarding the report				Ann Vandenhende, CSR Manager, a.vandenhende@spadel.com
	102-54	Claims of reporting in accordance with the GRI Standards				This report has been prepared in accordance with the GRI Standards, CORE level (essential).
	102-55	GRI content index				Cf. p. 14
	102-56	External assurance				Cf. external assurance report, p. 12-13. Carbon and water data were examined as well as non-financial information.
	103-1 G4 DMA,a	Explanation of the material topic and its Boundary				Cf. "Our responsibility" section p. 4. The report briefly explains why each pillar of the sustainable development strategy is a material issue.
	103-2	The management approach and its components				Cf. "Our responsibility" section p. 4. The report briefly explains why each pillar of the sustainable development strategy is a material issue.
	103-3	Evaluation of the management approach				The governance of the CSR strategy is described in p. 3. This report discusses some of the pillars of the strategy in more detail.

CSR PLATFORM	GRI DISCLOSURE	SUBJECT	UNIT	DATA 2017	DATA 2018	MORE INFORMATION		
Topic Specific disclosures linked to CSR Strategy								
Sustainability in everyone's job	404-2	Number of trainings on sustainability for the employees of the Group Spadel	#	12	7	/		
1 citizen day per employee	413-1	Number of participants from the Group Spadel to the citizen days.	#	41	94	Cf. p. 6		
	-	Trust Index score for the Group Spadel according to the Great Place to Work™ questionnaire.	, %	1	64	In 2018, the Spadel Group obtained a Trust Index score of 64%. All Spadel subsidia- ries participated in the survey, with an excellent response rate of 94%.		
	401-1	Personnel turnover	%	7,9 (2016 figures, excl. Devin)	15,84 (incl. Devin)	Spadel staff turnover was 15.84% (including Devin) in 2018.		
	403-1 (2016)	Welfare and safety of employees	%	100	100	The Spadel Group keeps a close watch on the well-being and safety of all workers and their working environment: the CPPT (Committee for Prevention and Protection at Work) ensures the health and safety of employees.		
	403-2 (2016)	absenteeism	%	0,2 (2016 figures, excl. Devin)	3,63 (incl. Devin)	Absenteeism amounted to 3.63% in 2018 for the entire Spadel Group.		
To be a best workplace	404-1	employee trainings	hours	18 (2016 figures, excl. Devin)	27 (incl. Devin)	On average, 27 hours of training were organised per worker in 2018, representing a total expenditure of €658,638.		
	405-1	distribution men/women	%	men: 77 women: 25 (2016 figures, excl. Devin)	men: 60,8 women: 39,2 (incl. Devin)			
	406-1	complaints concerning discrimination	#	none (2016 figures, excl. Devin)	none (incl. Devin)	No complaints were lodged with regard to discrimination in 2018.		
	407-1 408-1 409-1 412-1	EcoVadis ranking of the Group Spadel		golden	next review in 2019	With an overall score of 65/100, Spadel received the "Gold" rating from EcoVadis in May 2017. The audit found no risk to freedom of association and collective bargaining or incidents of child labour or forced labour.		
	204-1	Purchases within radius of 500 km	%	85 (2016 figures)	100	Cf. p. 8		
	308-1	Percentage of new strategic suppliers	%	70 (2040 5		Cf. p. 8		
	414-1	screened by EcoVadis	%	79 (2016 figures)	100			
80% sustainable	308-2	Evaluation of strategic suppliers (EcoVadis)	%	61 (2016 figures)	94	Cf. p. 8		
suppliers	308-2	Evaluation of strategic suppliers (SSPP)) %	93 (2016 figures)	92	Cf. p. 8		
	407-1			0 (2016 figures)				
	408-1	Identified risks in the supply chain	# O		0	Cf. p. 8		
	409-1							
	412-1							
100% Bee-friendly	304-3	Protection of water resources	ha	30,750 (incl.Devin)	30,750 (incl. Devin)	Cf. p. 9		
100 /0 Dee-menuly	304-3	Protective measures taken, partner- ships (Beediversity), status Life+,	%	85% with Devin	85% with Devin	Cf. p. 9		

CSR PLATFORM	GRI DISCLOSURE	SUBJECT	UNIT	DATA 2017	DATA 2018	MORE INFORMATION
	-	numer of sites "Gold" rated	#	1	1	Cf. p. 9
	303-1	water consumption	million litres	1473 (incl. Devin)	1483 (incl. Devin)	In 2018, the bottling process of the Spadel Group required 1,483 million litres of water. It was 100% ground water.
	303-2	Water Exploitation Index	%	<10 (Spa, Bru, Brecon)	<10 (Spa, Bru, Brecon)	Cf. p. 9
	303-3	Water reuse	mio littre	55,7	57,5	Cf. p. 9
"Gold" European Water Stewardship	306-1	water discharge	million litres	463,1 (incl. Devin)	702,9 (incl. Devin)	The total volume of wastewater was 702.9 million litres in 2018. 89% of this volume went through a biological and physical cleaning facility or a public water purification system applying the same treatment. Only in Bulgaria has the water treatment infrastructure not been completed yet. Devin = 79,895 m ³ , Brecon = 169,625 m ³ , Spa = 354,902 m ³ , Bru = 25,776 m ³ , Carola = 58,176 m ³ , Wattwiller = 14,600 m ³
	307-1	penalties or objections to formal procedures - environment	#	none	none	Spadel complies with all national, European and worldwide legislation. The Group has not received any financial or non-financial financial sanction on the ecological, economic or social plan.
Water-use ratio 1,6 I/I	303-3	water-use ratio	litre/litre	1,63 (incl. Devin)	1,58 (incl. Devin)	Cf. p. 10
	305-1	Direct (Scope 1) GHG emissions	ton CO2-eq	15,469 (excl. Devin)	13,257 (excl. Devin)	Cf. p. 10
Carbon neutral -	305-2	Energy indirect (Scope 2) GHG emissions	ton CO2-eq	863 (excl. Devin)	926 (excl. Devin)	Cf. p. 10
general	305-3	Other indirect (Scope 3) GHG emissions	ton CO2-eq	86.401 (excl. Devin)	91.695 (excl. Devin)	Cf. p. 10
	305-4	GHG emissions intensity	g CO2-eq/litre	160 (excl. Devin)	157 (excl. Devin)	Cf. p. 10
	305-5	carbon footprint reduction	%	-24 (excl. Devin)	-26 (excl. Devin)	Cf. p. 10
	302-1	energy consumption	MWh	94.971 (excl. Devin)	88.029 (excl. Devin)	Cf. p. 10
	302-1	renewable energy consumption	%	36% (excl. Devin)	42% (excl. Devin)	Cf. p. 10
Carbon neutral by renewable energy	302-4	energy efficiency	%	+1 (excl. Devin)	-6 (excl. Devin)	Although sales increased by 31% compared to 2010, energy consumption fell by 6% (excluding Devin).
	302-4	Energy reduction per bottled litre	% / litre	-19% (excl. Devin)	-28% (excl. Devin)	With a consumption of 0.130 kWh per litre bottled, Spadel registered a decrease of 28% compared to 2010 (except Devin).
Carbon neutral by	301-1	Total material use	ton	23.474 (excl. Devin)	23.662 (excl. Devin)	In 2018, Spadel used 23,663 tons of raw materials. This figure includes all primary, secondary and tertiary packaging materials (excluding reusable packaging such as reusable pallets).
sustainable packaging	301-2	Total recycled material use	%	24 (excl. Devin)	20 (excl. Devin)	In 2018, the proportion of recycled material in products was 20%. Spadel is commit- ted to constantly innovating its products and processes. This percentage decrease compared to previous years is due to the development of the product offering. For example, we are gradually removing our cans.
Carbon neutral by green logistics	305-3	Achievements Lean and Green plan				Spadel participates in the Lean & Green programme with its logistics partners. When writing this report, we were still waiting for the L&G audit report on recent initiatives.
To promote hydration	413-1	Strategic partnerships in each market	#		4	Cf. p. 11
100% natural & low	416-1	Average calorie content of flavoured waters and lemonades	kcal/100 ml	14,8	11,4	Cf. p. 11
caloric drinks	416-1	Products according to Spadel naturality framework	%	93,3	100	Cf. p. 11

CSR PLATFORM	GRI DISCLOSURE	SUBJECT	UNIT	DATA 2017	DATA 2018	MORE INFORMATION			
Topic Specific disclosu	Topic Specific disclosures not linked to CSR Strategy								
	201-1	turnover (before tax)	mio euro			Cf. p. 4 of the 2018 annual report			
	206-1	legal anti-competition actions	#	0	0	In 2018, no legal proceedings were brought against Spadel for anti-competitive behaviour.			
	415-1	Political contributions	#	0	0	Spadel gives no political support.			
	416-2	Number of takebacks	#		0	No recovery was necessary in 2018.			
	417-1	Information on the label				Spadel complies with EU Regulation 1169/2011 of the European Parliament and Council of 25 October 2011 on the labelling, presentation and advertising of foodstuffs. The label lists the ingredients for all waters and drinks (non-alcoholic). Information on the destination of packaging is voluntary and mentioned on 35% of the range. Our disposable packaging must be recycled: The Green Dot (Fost Plus) is therefore included on all single-use packaging intended for Belgium and the rubbish bin is mentioned on packaging or our websites, as permitted by current legislation. Brecon Carreg products comply with EU Regulation 1169/2011. Devin's products are not yet affected by the Group's procedures.			
	417-2	violations of label information	#	0	0	No infringement was found in 2018.			
	417-3	violations of voluntary marketing codes	#	0	0	No infringement was found in 2018.			
	418-1	violations of confidentiality of information	#	0	0	No infringement was found in 2018.			
	419-1	fines and non-monetary sanctions	#	0	0	No penalty was imposed in 2018.			









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