



ES Group policy for responsible water use and stewardship

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1	Initial publication	January 19, 2026
2	Clarification of water storage treatment for fire-suppression systems and simplification of reporting requirements (sections 6.1 and 6.4 and Appendix 1).	January 30, 2026

1. Purpose

ES Group is committed to the responsible use of freshwater and to preventing water pollution.

We aim to reduce consumptive water use and protect local water bodies where we operate.

This supports compliance with ESRS E3 standard and our wider sustainability strategy supported by the group's Double Materiality Assessment (DMA).

2. Scope

This policy applies to all ES Group companies, sites and activities under operational control, listed hereunder.

Country	Site	Legal entity
Poland	Zakrzewo (Złotów)	Marmite Sp. Z o.o.
Spain	La Vall d'Uxó (Castellón)	Construplas, S.L.U.
Spain	Burriana (Castellón)	Construplas, S.L.U.
Spain	Nájera (La Rioja)	Fiora Bath Collections, S.L.U.
Spain	Ribarroja de Turia (València)	Moldcom Composites, S.L.U.
Spain	Dolores (Alicante)	Tough Systems, S.L.
Spain	Redován (Alicante)	Novarali, S.L.
Spain	Luque (Córdoba)	Estrelizia Bath, S.L.
USA	Sugar Hill (Georgia)	MTI Baths Inc.
Mexico	Monterrey	ES Group

This policy covers water withdrawals, consumption, recycling or reuse, storage and discharges.

3. Principles

We follow these principles across the group:

- **Working together.** We treat water stewardship as a shared task. We involve operations, R&D and commercial teams. We also engage suppliers and customers when it improves outcomes.
- **Staying ahead.** We act on responsible water usage before it becomes a legal constraint. We accept uncertainty and learn fast. We are aware water is a growing scarcity and are taking steps ahead of future regulatory requirements.
- **Taking control.** We build internal capability for water measurement and management. We do not rely only on external parties for core know-how.
- **Deciding with data.** We measure water use and impacts with rigour. We set targets from evidence. We verify the real effect of our actions.

4. Commitments

4.1 Water management in operations

Our core manufacturing processes are essentially water-free. Water is not used as a process input for casting, curing, machining or finishing our products.

Water use in operations is limited to auxiliary activities. These include both production-support operations and general facility uses such as offices, welfare areas and cleaning.

Within production-support operations, relevant uses currently occur at the following plants:

- Quality control of spas and bathtubs (MTI and Mexico)
- Washing of finished shower trays prior to packing (Moldcom)
- Hydro-printing decoration (Moldcom).
- Water evaporators to control temperature and relative humidity (Moldcom).

Such uses are low-volume and are monitored separately.

Each company shall:

- Maintain a site-level water management plan.
- Map all water inflows, uses, losses, reuse loops and outflows.
- Ensure critical water points are metered or reliably estimated.
- Use preventive maintenance to minimise leaks and losses.

4.2 Sustainable sourcing and efficiency

We shall:

- Only use municipal or authorised water sources, disregarding unmanaged abstraction.
- Optimise process water use through good housekeeping and equipment upgrades.
- Review high-use processes annually to identify reduction options.
- Consider water efficiency in capex and process redesign choices.

Moldcom has replaced the manual washing of products with an automatic washing machine. Several sites have implemented dual-flush WCs, aerators in water taps, timers in dressing rooms' showerheads and leak detection systems.

4.3 Reuse, recycling and circular practices

We shall:

- Identify opportunities to reuse process water internally.
- Expand closed-loop or cascade uses where quality permits.
- Track volumes recycled and reused at each site.

MTI and Mexico have implemented closed-loop water systems where water is reused in bathtub and spa quality assurance processes. Moldcom is exploring the possibility of turning water evaporators in the factory floor into a closed-loop system.

4.4 Pollution prevention and discharge control

Each site shall:

- Comply with local permits and legal limits for discharges.
- Monitor key pollutants relevant to its processes.
- Apply treatment or process changes to prevent contamination.
- Investigate and report any spill or release affecting water bodies.

Currently, no site is required by local authorities to dilute pollutants in the wastewater.

4.5 High water-risk areas

We identify water-risk areas using the WRI Aqueduct Water Risk Atlas¹, and specifically the “Water stress” indicator under Physical Risks – Quantity.

We update the assessment yearly and keep the records in the ES Group water register.

Sites are classed as water-risk relevant when baseline water stress is High (40–80%) or Extremely High ($\geq 80\%$).

Where a site is classed as water-risk relevant, we shall:

- Classify the site as water-risk relevant in the group register.
- Give priority to reduction and reuse actions.
- Assess operational and reputational risks annually.
- Engage with local authorities or initiatives when useful.

5. Targets

ES Group shall set group targets once baseline data is available.

Targets will cover total consumption, consumption in water-risk areas and reuse or recycling rates.

Targets can be mandatory or voluntary, and both types will be stated clearly.

Baseline year for consolidated reporting at the group level is 2025, notwithstanding that individual companies may be reporting separately with different baseline years.

6. Monitoring and reporting

Each company shall report water data to the group sustainability function on a monthly basis.

Reporting covers own operations for year 1, with value-chain expansion to follow where material.

Internal water accounting follows the Water Footprint Network (WFN) framework and is structured by blue, green and grey water footprints.

Site-level reporting focuses on measured data and simple factual inputs.

Group-level calculation and consolidation are applied for blue water consumption, storage adjustments and water intensity, using consistent methodologies.

Calculation follows the *Guía para el cálculo de la Huella Hídrica y Huella de Agua* (Generalitat Valenciana).

The resulting data are mapped to ESRS E3 disclosure terms for external reporting.

Both references are summarised in Appendix 1.

Monitoring and reporting activities are carried out by site managers and local Environmental, Health & Safety managers, in line with the roles described in section 8.

To avoid ambiguity, key water terms used in this policy, including ‘water withdrawal’, ‘water consumption’ and ‘water balance’, are defined in Appendix 2. These definitions are intended to ensure consistent understanding and reporting across all sites.

¹ <https://www.wri.org/applications/aqueduct/water-risk-atlas>

6.1 Blue Water Footprint (WF_{blue}): Consumptive use of surface, groundwater or municipal water

Blue water footprint covers water that is consumed and not returned to the same basin in the same period. It includes evaporation, incorporation into product, or transfer to another basin.

For ES Group, blue water use relates almost exclusively to municipal water used in auxiliary operations, including both production-support activities and general facility uses such as offices, welfare areas and cleaning

At site level, data collection is limited to the following:

- Total municipal water withdrawn (m^3), measured at the main connection point.
- Short explanatory comments where significant changes occur.

Blue water consumption is calculated at group level. Sites are not required to calculate consumption themselves.

Method notes:

- Where direct measurement of consumption is not available, consumption is estimated using a consistent group methodology based on withdrawal data and conservative assumptions.
- Unless otherwise stated, surface water and groundwater withdrawals are assumed to be zero.
- Each figure is tagged as measured, estimated or modelled in the group register.

6.2 Green Water Footprint (WF_{green}): Rainwater consumed in operations

Green water footprint covers rainwater stored in soil or vegetation and then evapotranspired.

Relevance note for ES Group:

- Our industrial activity is not rainwater-dependent. Green water is immaterial for ES Group, except where a site has irrigated green areas or other rainwater-dependent activity.
- In those cases, report:
 - Area of irrigated green zones or crops (m^2).
 - Estimated rainwater consumption linked to those areas (m^3).

6.3 Grey Water Footprint (WF_{grey}): Water pollution load expressed as dilution volume

Grey water footprint represents the theoretical volume of freshwater required to dilute the most critical pollutant in discharges to meet applicable standards. It does not depend on whether dilution occurs in practice.

For ES Group, grey water is expected to be immaterial because our core processes are water-free and wastewater streams are limited to auxiliary washing and decoration in one of our plants (Moldcom).

Minimum data per site (where discharges are relevant):

- Discharge destination and, where available, total water discharged (m^3).
- Key contaminant concentrations in discharge (mg/l) for the most critical pollutant.
- Applicable legal or permit limit (C_{max}) and assumed natural concentration (C_{nat}).
- Calculated grey water footprint (m^3).

If no relevant pollutant load is identified according to local regulations, the site shall record Grey Water Footprint as not material, with the basis stated.

Potential pollutants for the current auxiliary operations are the following:

- Hydro-printing: Organic load (COD) from PVA carrier films and inks, pigments and suspended solids.
- Pre-packing product washing: Gelcoat and mineral + resin dust particles.

6.4 Storage and balance

Several ES Group sites operate water storage systems used exclusively for fire-suppression purposes.

This storage is normally maintained at a constant reference volume, is automatically refilled from the municipal supply when required, and does not form part of an operational water cycle.

Fire-suppression storage is therefore considered operationally neutral and is not tracked through opening and closing storage volumes for routine reporting. Any exceptional refill following fire-suppression use, testing or maintenance is captured through municipal water withdrawal figures.

One site operates a closed-loop water system for quality assurance testing of spa pumps. This system is designed for recirculation, with near-zero net water consumption.

Only make-up water added to maintain system operation is captured through municipal water withdrawal.

A simplified water balance is applied at group level as a plausibility check for consolidated data. Sites are not required to calculate or report water balances or discharge volumes.

6.5 Intensity and consolidation

Water intensity is used as a group-level monitoring indicator.

The group sustainability function shall calculate water intensity as blue water consumption per €M net revenue ($m^3/€M$) and year-on-year changes at company and group level using the total annual blue water consumption (m^3), as defined in section 6.1, and annual net revenue (€).

Sites are not required to calculate water intensity locally.

Any significant year-on-year change shall be explained at company level, focusing on:

- Changes in production volume or mix,
- Implementation of water reduction or reuse actions,
- Anomalies or one-off events.

The baseline year for intensity comparison is 2025.

7. Continuous reduction of water footprint

ES Group is committed to the continuous reduction of its water footprint, with a focus on blue water consumption in own operations.

Actions to reduce water consumption include, where applicable:

- optimisation of auxiliary water-using operations;
- expansion of reuse and closed-loop systems;
- prevention of leaks and losses;
- efficiency improvements in equipment and processes;
- integration of water efficiency considerations into capex decisions.

Performance review shall take place annually at the end of the third quarter.

This review shall include:

- a review of water consumption data for each site;
- a discussion with site management on the effectiveness of actions taken;
- an assessment of whether current measures are delivering the expected results;
- the identification and planning of additional reduction actions, where relevant.

Outcomes of this review shall inform updates to site-level water management plans and support the definition or adjustment of group water targets.

8. Roles and responsibilities

ES Group Head of Innovation and Sustainability

- Sets the policy, defines reporting templates and calculation methodologies, and is responsible for group-level consolidation and ESRS E3 disclosures.
- This includes the estimation methods for blue water consumption, storage adjustments and water intensity calculations.

Company management

- Ensures implementation of the policy at company level and provides the necessary resources for data collection.
- Validates reported data and supports explanations for significant year-on-year changes.

Site managers and local Environmental, Health & Safety managers

- Are responsible for site-level water management.
- They ensure accurate reporting of measured data, including municipal water withdrawal, and reuse where applicable.
- They support basic water balance checks and provide contextual explanations, but are not required to calculate consumption, discharge or intensity locally.

All employees

- Are expected to follow good water-use practices and to report leaks, anomalies or incidents that could affect water use or data quality.

9. Review and continuous improvement

This policy shall be reviewed annually, or sooner if regulations or risks change.

Planned review month will be November, anticipating the implementation of changes in the following year. The updated policy shall be circulated to ES Group Head of Compliance for comments and approval.

Lessons learned from data trends and incidents will drive updates to actions and targets.

Appendix 1 – Summary of key reference documents for reporting

ESRS E3 – Water and marine resources

ESRS E3 defines the mandatory disclosure requirements for water under the Corporate Sustainability Reporting Directive. Its objective is to ensure transparency on how the undertaking affects and depends on water resources, and how related risks, impacts and opportunities are managed.

For reporting purposes, ESRS E3 requires undertakings to disclose, for own operations:

- Policies, actions and targets related to water management.
- Processes used to identify water-related impacts, risks and opportunities.
- Quantitative metrics on water use, including:
 - Total water consumption (m³).
 - Water consumption in areas at water risk or high water stress.
 - Water recycled and reused (m³).
 - Water storage and changes in storage (m³), where operationally relevant².
 - Water intensity (m³ per €M net revenue).
- Contextual information explaining data sources, methodologies and data quality.
- The method used to classify areas at water risk.

ESRS E3 does not prescribe a single accounting methodology. It allows undertakings to use recognised water accounting frameworks, provided the required ESRS metrics are reported clearly and consistently.

Guía para el cálculo de la Huella Hídrica y Huella de Agua – Generalitat Valenciana

The *Guía para el cálculo de la Huella Hídrica y Huella de Agua* provides a practical methodology for quantifying water use and water-related impacts at organisational and site level. It follows internationally recognised Water Footprint Network principles.

For reporting purposes, the guide:

- Structures water accounting into three components:
 - **Blue water footprint (WFblue)** – consumptive use of surface, groundwater or municipal water.
 - **Green water footprint (WFgreen)** – rainwater consumed through soil and vegetation.
 - **Grey water footprint (WFgrey)** – theoretical water volume required to dilute pollutant loads to acceptable standards.
- Defines how to build a site-level water inventory, covering inflows, uses, losses, reuse and outflows.
- Allows the use of measured, estimated or modelled data where direct measurement is not available, provided assumptions are stated.
- Supports proportional application, allowing green and grey water to be treated as immaterial where justified by process characteristics.

This guide is used by ES Group as the technical basis for internal water accounting and site data collection. Its outputs are mapped to ESRS E3 disclosure terms for external sustainability reporting.

² Where water storage is operationally neutral (e.g. fire-suppression systems or closed-loop Quality Assurance systems), changes in storage are not tracked routinely and are addressed through withdrawal data.

Relationship between both references

ES Group applies the Water Footprint Network structure (blue, green and grey) as defined in the Generalitat Valenciana guide to organise internal water data. These data are then consolidated and translated into the metrics and disclosures required by ESRS E3.

This approach ensures:

- Consistent site-level data collection.
- Transparency on assumptions and data quality.
- Full alignment with ESRS E3 reporting requirements.

Appendix 2 – Glossary of water terms

Blue water footprint (WFblue)

Consumptive use of surface water, groundwater or municipal water, expressed in cubic metres.
In ES Group operations, WFblue relates almost exclusively to municipal water.

Green water footprint (WFgreen)

Rainwater consumed through soil or vegetation, typically via evapotranspiration.
For ES Group, WFgreen is generally immaterial, except where sites have irrigated green areas or other rainwater-dependent activities.

Grey water footprint (WFgrey)

Theoretical volume of freshwater required to dilute pollutant loads in wastewater to meet applicable quality standards.
For ES Group, WFgrey is generally immaterial due to the limited and auxiliary nature of wastewater streams.

Discharge (residual)

Water leaving the site, typically to sewer.
Where discharge is not metered, it is inferred as a residual from the site water balance and is not reported as a primary metric.

Water balance

A simplified reconciliation of water withdrawal, estimated consumption and changes in storage, used as a plausibility check for data quality.

Water consumption

The portion of withdrawn water that is not returned to the same river basin in the same period.
For ES Group, this mainly consists of evaporation and minor losses.
Water discharged to sewer is not considered consumed.

Water withdrawal

Total volume of water entering a site during the reporting period, measured at the main connection point.
For ES Group sites, this is typically municipal water.

Water reuse / recirculation

Water that is used more than once within the site before discharge, including closed-loop systems.

Water storage

Water held in on-site tanks or systems at a given point in time.
Opening and closing storage refer to volumes at the start and end of the reporting period.