



ESG REPORT 2025

Advancing Sustainability, Empowering Tomorrow





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About this Report

Welcome to Lulu Retail Holdings PLC's (hereafter 'LRHL', 'Lulu Retail', or 'we') annual environmental, social, and governance (ESG) Report 2025. As the second ESG report for the listed entity, this publication continues a broader reporting journey that includes four reports for Lulu Retail and five for the organisation overall.

This report provides a comprehensive overview of our sustainability performance, outlining how we continue to strengthen our ESG practices across our global operations. It presents our progress against material ESG topics and offers stakeholders, including employees, customers, suppliers, government partners, and investors, a clear view of the actions we are taking to advance our sustainability commitments. It also highlights the policies, initiatives, and governance mechanisms that guide our responsible business conduct.

This 2025 report covers Lulu Retail's retail, wholesale, sourcing, and offshore operations across 26 countries for the reporting period from 1 January to 31 December 2025. There have been no significant changes to the reporting boundary since the previous reporting period.

Our disclosures have been prepared in accordance with the Global Reporting Initiative (GRI) Standards 2021 and are further aligned with the United Nations Sustainable Development Goals (UN SDGs), relevant industry Sustainability Accounting Standards Board (SASB) Standards, and the national development priorities of the countries in which we operate. As a company listed on the Abu Dhabi Securities Exchange (ADX), our report aligns with the ADX ESG Disclosure Guidance.

Looking ahead, we will continue to enhance the quality and clarity of our sustainability reporting by benchmarking our performance against leading global frameworks and evolving best practice, ensuring that our disclosures remain transparent, robust, and decision-useful.

We value the feedback of our stakeholders and welcome comments, suggestions, or questions about this report or our broader ESG performance.



Please contact us at
esg@ae.Lulumea.com

Forward Looking Statements

This report contains certain forward-looking statements. All statements, other than statements of present or historical fact, are or may be deemed forward-looking statements. By their nature, forward-looking statements involve known and unknown risks and uncertainties that could materially affect expected results of operations, cash flow and business prospects, because they relate to events and depend on circumstances that will or may occur in the future. Readers should not place undue reliance on forward-looking statements, which speak only as of the date of this report.



MESSAGE FROM THE LEADERSHIP

Foreword from the Chairman

Welcome to Lulu Retail's 2025 ESG Report. This year, our theme 'Advancing Sustainability, Empowering Tomorrow' reflects our continued commitment to shaping a sustainable future for our customers, communities, employees, and the environment. In this report, we share the strides we have made in 2025 as we strengthen governance, advance environmental stewardship, and deepen our social contribution across all regions where we operate.



Throughout the year, we reinforced our commitment to integrating sustainability into every facet of Lulu Retail's growth journey. Guided by our materiality assessment, we continued progressing across our three ESG pillars: Managing Our Environmental Impact, Creating Value for People and Communities, and Advancing Responsible Governance. These efforts included broadening our clean-energy transition, further embedding efficiency across our operations, and enhancing waste-reduction practices.

We also made meaningful progress in minimising our environmental footprint. In 2025, we advanced our climate risk assessment preparedness, initiated the monitoring and reduction of our value chain footprint, and expanded solar installations across key locations. We strengthened water-efficiency programmes, broadened recycling initiatives, and allocated space for eco-friendly product options to support more sustainable customer choices.

Our people remain at the heart of our success. This year, we continued to invest in learning and development, delivering 1,206,051 training hours across our global workforce. We enhanced employee wellbeing, reinforced safety systems, prioritised national hiring, and supported a workplace culture built on fairness, respect, and opportunity.

Strong governance continues to anchor our progress. In 2025, we enhanced compliance systems, strengthened product quality controls, and reinforced transparency across our operations. These measures reflect the trust placed in us by our customers, partners, and communities, and our responsibility to uphold that trust.

We recognise that today's sustainability challenges require long-term thinking and collective action. We remain committed to working alongside governments, partners, and communities to accelerate progress and contribute positively to our region and industry.

Our achievements this year would not have been possible without the dedication of our employees and the continued support of our stakeholders. I extend my sincere gratitude to all who contribute to shaping a responsible and resilient Lulu Retail.

Together, we continue to move forward with purpose—creating sustainable value today while helping to shape a better world for tomorrow.

Mr. Yusuf Ali MA
Chairman

MESSAGE FROM THE LEADERSHIP

Quote from the ED



At Lulu Retail, efficiency and sustainability go hand in hand. In 2025, we continued embedding smarter systems, cleaner energy solutions, and responsible resource management across our operations. These efforts not only reduce our environmental footprint but also strengthen operational excellence and deliver lasting value for our stakeholders.

Ashraf Ali MA
Executive Director - Global Operations



MESSAGE FROM THE LEADERSHIP

Foreword from the CEO

The impacts of climate change, resource pressures, and rising social expectations continue to influence the global retail landscape. For businesses to remain resilient and future-ready, sustainability must be embedded into decision-making, operations, and long-term strategy. At Lulu Retail, sustainability is not an add-on—it is central to how we grow, serve communities, and create lasting value.



In 2025, we advanced our sustainability journey by strengthening environmental performance, empowering our people, enhancing customer trust, and reinforcing the governance structures that underpin our operations. With a presence across the GCC, Lulu Retail plays a significant role in driving positive change across the retail sector, and our progress this year reflects that ambition.

Through our solar installations in Bahrain, the United Arab Emirates (UAE), and Saudi Arabia, we expanded our renewable-energy footprint, generating 4,991,492 kWh of clean energy and reducing emissions by 3,346 tonnes. These efforts were complemented by targeted energy-efficiency improvements across our operations, including lighting, HVAC optimisation, and digital monitoring. We also continued to strengthen resource efficiency through focused water-management initiatives and waste-management programmes, advancing recycling, food-waste reduction, and circular-economy practices to reduce environmental impact and improve operational efficiency.

Customer trust continues to define our value proposition. In 2025, we strengthened product quality and safety processes across our regions. We maintained ISO 22000 certification, Hazard Analysis and Critical Control Point (HACCP) and ISO 9001:2015 systems to ensure our products meet the highest safety and regulatory standards. We provided dedicated spaces for eco-friendly products and expanded our organic, health-focused, and free-from ranges to support informed customer choices.

Our people remain at the core of our progress. This year we delivered 1,206,051 training hours, strengthened nationalisation efforts, supported employee wellbeing, and expanded opportunities for women, resulting in female workforce participation rising to 18.5%. These initiatives reflect our commitment to building a capable, inclusive, and motivated workforce.

Our responsibility extends beyond our operations. In 2025, Lulu Retail continued partnerships with charities, and government entities to support vulnerable groups and contribute to national priorities. Programmes focused on food security, health and wellness, inclusion, and community development reinforced our commitment to positive social impact.

All these achievements are possible only because of the dedication and passion of our employees. I extend my deepest thanks to every member of the Lulu Retail family for their hard work and commitment. I also thank our Board of Directors, our partners, and our valued stakeholders for their continued trust and support.

As we look ahead, we remain focused on accelerating innovation, scaling our impact, and strengthening sustainability across our business. We hope this report provides clear insight into our journey and ambitions for a more sustainable future.

Saifee Rupawala

Chief Executive Officer



MESSAGE FROM THE LEADERSHIP

Foreword from the CSO

At Lulu Retail, sustainability remains a core driver of our long-term strategy and operational decision-making. We embed responsible practices across all regions by aligning our actions with our ESG Policy, setting clear and measurable goals, and maintaining disciplined governance and oversight. This ensures that sustainability is not treated as a standalone initiative, but is fully integrated into how we plan, operate, and grow the business.



In 2025, we made meaningful progress in strengthening our environmental performance and advancing our clean-energy transition. We enhanced our preparedness for climate-related risks by expanding scenario assessments and initiating value-chain monitoring to better understand our emissions profile. During the year, we reaffirmed our commitment to decarbonisation and established a structured pathway aligned with net-zero ambitions, combining both mitigation and adaptation actions that are underway and planned. Across key regions, we expanded energy-efficiency initiatives, scaled digital monitoring systems, and advanced new solar installations. Once fully operational, these installations are expected to deliver measurable reductions in our carbon footprint.

Progress in circularity was another key focus area. We strengthened waste-segregation infrastructure, deepened stakeholder partnerships, and increased awareness among employees and customers. Key initiatives included launching an Extended Producer Responsibility (EPR) pilot covering packaging waste, e-waste, and used batteries; reactivating the school-uniform take-back programme across 50 stores; and expanding refill and eco-friendly packaging initiatives. We also scaled the recycling of used cooking oil into biodiesel for our transportation fleet through third-party partnerships. Our Reverse Vending Machines collected over 55.5 million bottles and cans, reinforcing our commitment to circularity, operational impact, and customer participation. Together, these initiatives support our ambition to minimise waste to landfill and promote responsible consumption across our stores.

As a leading food retailer, we recognise that sustainability extends beyond environmental stewardship to include the health and wellbeing of the communities we serve. In 2025, Lulu Retail voluntarily advanced healthy food strategy focused on reformulation, responsible promotion, and customer awareness. This included expanding our range of in-house products with reduced salt, sugar, and fat content, alongside the use of smart in-store placement to encourage healthier alternatives. These actions are designed to support informed and healthy food choices while preserving customer choice, accessibility, and affordability.

We also continued to strengthen supply-chain sustainability. This included enhancing product safety and quality controls, expanding eco-friendly private-label offerings, and reinforcing compliance and traceability through internationally recognised standards, including ISO 22000, HACCP, and ISO 9001:2015. Collaboration with suppliers who share our values continued to grow, supporting stronger

alignment on environmental, social, and ethical expectations.

Our ESG approach recognises that geopolitical risk has become a material governance and sustainability consideration, with direct implications for supply-chain resilience, responsible sourcing, and long-term value creation. In response, we continue to expand and deepen our sourcing network to ensure continuity of supply while upholding ethical and environmentally sustainable sourcing standards. These considerations support long-term resilience in an increasingly complex global environment.

Supporting our employees and communities remained a priority throughout the year. In 2025, we delivered health and safety, food-handling, and customer-service training across all markets, supported by our newly introduced Learning Management System. Our community engagement programmes continued to expand, with a focus on social welfare, food security, youth engagement, and charitable initiatives across the regions we serve.

We further strengthened customer engagement by raising sustainability awareness in-store, expanding eco-friendly product sections, and installing e-waste collection points—empowering customers to actively participate in our sustainability journey.

Our sustainability efforts remain closely aligned with regional and national priorities, including the UAE Net Zero 2050 Strategy, Saudi Vision 2030, Qatar National Vision 2030, and the wider GCC sustainability agenda. By contributing to these shared objectives through renewable-energy adoption, circular-economy initiatives, responsible sourcing, and community development, we continue to create long-term value for our customers, partners, and stakeholders.

Looking ahead, we remain committed to accelerating sustainability across our global operations, strengthening climate resilience, and further reducing our environmental impact. I am proud of the progress achieved in 2025 and grateful to our teams, partners, and communities for their continued collaboration and commitment.

Mohamed Althaf

Group Director – Global Operations and Chief Sustainability Officer



Lulu Retail: Our Journey and Growth

Lulu Retail Overview

Lulu Retail is a multinational conglomerate headquartered in Abu Dhabi, UAE, with an extensive operational presence across global markets.

Founded by Yusuff Ali M.A., Lulu Retail has expanded into a leading international enterprise with a diversified portfolio spanning retail operations, wholesale, sourcing, and offshore activities. As of 2025, the company has achieved an annual turnover of USD 7.9 billion and employs more than 52,000 people, proving itself as a major economic contributor in the Gulf region and beyond.

Vision, Mission and Commitment



OUR VISION

To position Lulu as a top global retail brand, leading the organised retail sector in all regions and aiming to be the preferred employer for a diverse workforce.



OUR MISSION

To deliver a unique shopping experience with top-notch products and services, while seeking new market opportunities and benefiting all business associates.



OUR COMMITMENT

Lulu is committed to ethical business practices, from sourcing products globally to offering them at fair prices in our stores, aiming to bring smiles and happiness to all.

Our Global Footprint

Lulu Retail is one of the leading retail groups in the GCC, with a rapidly expanding global footprint. We operate across 26 countries, supported by an integrated network of retail, wholesale, sourcing, and offshore operations that enable us to serve diverse customer needs efficiently and at scale. Our retail presence spans 6 countries, complemented by wholesale operations in 8 countries, sourcing activities in 19 countries, and offshore operations in India.



26
countries



267
stores



14.9
million+ sq. ft.
retail space



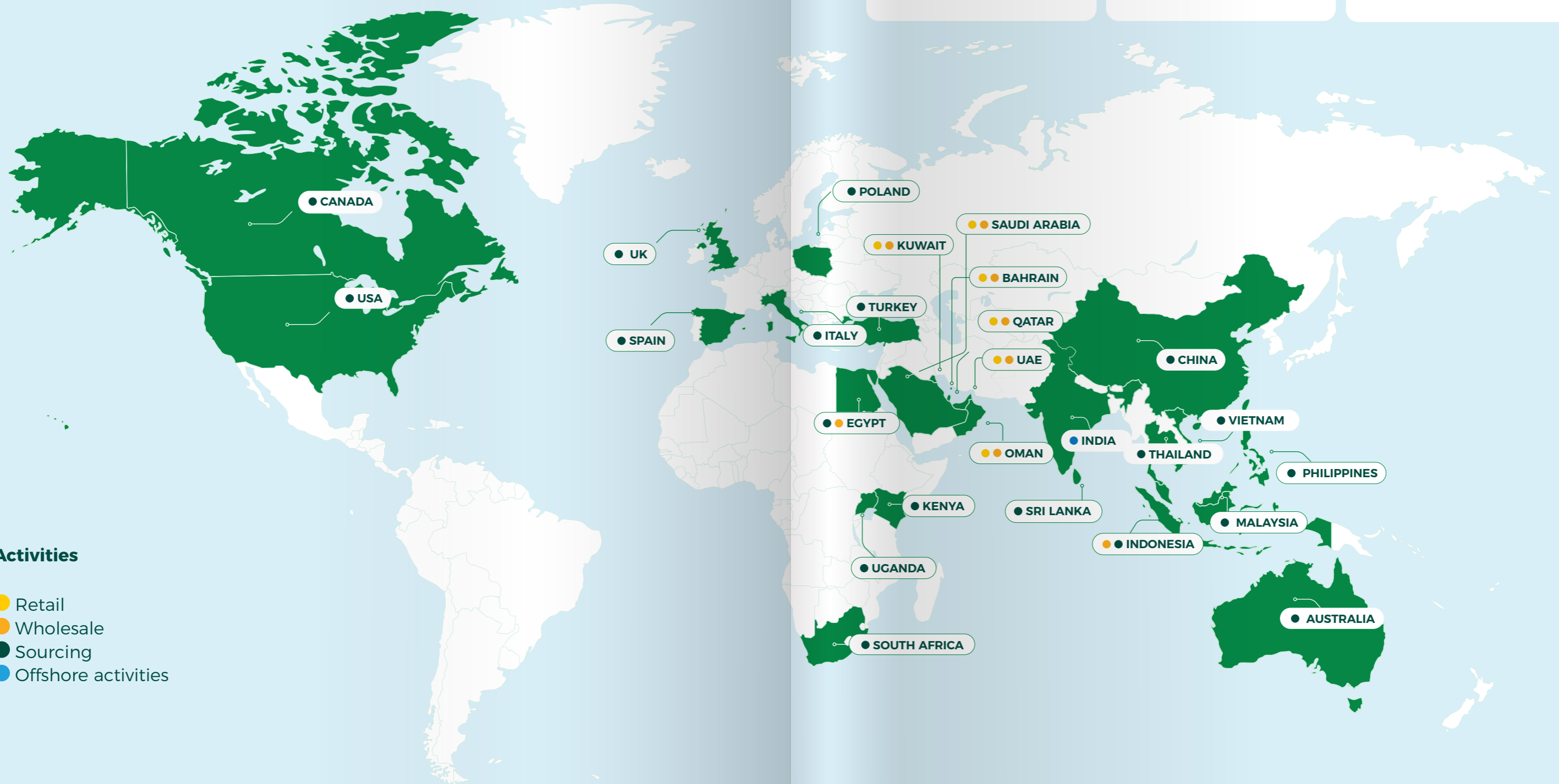
21
distribution centres



248M+
annual footfall



52,437
employees



Activities

- Retail
- Wholesale
- Sourcing
- Offshore activities

Our Certifications

Certifications

Across our operations, we have earned a range of certifications that validate our commitment to sustainability, operational excellence, and adherence to globally recognised best practices.

Certification	Region/Country
 Green Building Certification	Qatar - GSAS, United Kingdom (UK) - BREEAM
 ISO 14001 (Environmental Management System)	UAE Kuwait, Thailand
 ISO 9001 (Quality Management System)	UAE, Kingdom of Saudi Arabia (KSA), United States of America (USA), Thailand, China, Private Label, HR Department - Head Office
 HACCP (Hazard Analysis and Critical Control Point)	Qatar, Oman, UAE, Bahrain
 ISO 45001 (Occupational Health and Safety Management System)	UAE, Kuwait
 Organic Product Certification	Sri Lanka
 ISO 22000 (Food Safety Management System)	Qatar, Oman, Kuwait, Bahrain, KSA, UAE
 PCI DSS (Payment Card Industry Data Security Standard)	Bahrain, Qatar, KSA, Kuwait



Certification	Region/Country
 ISO 21001 (Educational Organisation Management System)	Oman
 ISO 22301 (Business Continuity Management System)	UAE
 In-Country Value (ICV) Certificate	Qatar
 SEHA Blood Bank Services Appreciation certificate by SEHA Blood Bank for Lulu Retail's commitment to regular blood donation	UAE
 ADAFSA Appreciation Certificate by Abu Dhabi Agriculture and Food Safety Authority (ADAFSA) for Food Automated Teller Machine (ATM) collaboration	UAE
 Certificate of Appreciation by Ministry of Interior	Qatar
 Appreciation Certificate by Ministry of Commerce and Industry for supporting the public hygiene campaign during the 2025 Arab Cup	Qatar
 Soil Association Certificate for Organic Products	UK
 Green Certificate by Recycle Right LLC for recycling used textiles collected under school uniform take back programme	UAE
 Achieved carbon saving certificate for using multimodal transport, resulting in 1,460 kg CO ₂ e savings and 77% less impact, as verified by Rail Direct	UAE
 Recycling Authentication Certificates for converting 132,010 litres of used cooking oil (UCO) to produce 125,410 litres of biodiesel	UAE

Awards and Achievements

UAE



- Sheikh Mansour bin Zayed Agriculture Excellence Award** from Dr. Amna bint Abdullah Al Dahak Al Shamsi, Minister of Climate Change and Environment, UAE
- Received appreciation from **Al Noor Center for Rehabilitation of People of Determination** for active participation in skill development and empowerment initiatives
- Leadership Awards 2025 for Company of the Year:** Retail Sustainability Leadership by Solar Quarter Middle East
- Leadership Awards 2025 for Best Solar Project of the Year (Retail Rooftop)** by Solar Quarter Middle East
- Leadership Awards 2025 for Project of the Year:** Circular Economy & Waste-to-Energy (Used Cooking Oil into Biodiesel) by Solar Quarter Middle East
- Golden Spoon Awards 2025 for Most Admired Supermarket Chain of the Year** by the Images Retail ME
- Golden Spoon Awards 2025 for Most Admired Marketing Campaign of the Year** by the Images Retail ME
- Middle East Retail Forum (MRF) for Most Admired Value Retailer of the Year** by the Images Retail ME

OMAN

- Honoured with Consumer Friendly Establishments Award** from Consumer Protections Authority (CPA)
- Recognised as the Most Trusted Brand in Hypermarket Category** by APEX Media
- Received The Oman Marketing Impact Award by Muscat Media Group for **Best Event Activity**
- Received The Oman Marketing Impact Award by Muscat Media Group for **Best CSR Campaign**
- Awarded the prestigious Retailer of the Year** by The Arabian Stores, recognising our commitment to exceptional customer experience and strong market leadership

KUWAIT



KSA



- Awarded Most Admired Value Retailer of the Year** at the Images Retail ME Awards
- Recognised by the Ministry of Environment, Water & Agriculture in Qatif**, for supporting the Qatifi Almond Festival 2025 and championing local farmers
- Honoured by HRH Princess Haifa AlFaisal, Chairman of the Zahra Association**, for participating in the Breast Cancer Awareness Campaign
- Set a Guinness World Record** for creating the world's largest shattered-glass artwork in celebration of the 95th Saudi National Day

QATAR





















- Received the prestigious appreciation from the Ministry of Municipality** for contribution to the Public Services Affairs Sector
- Achieved a Guinness World Record for the Dugong Sculpture** made from recycled plastic bags, created in collaboration with Gallery Five
- Awarded Best Corporate Social Responsibility (CSR) Initiative** in the Retail Sector at the Qatar CSR Summit & Awards 2025 for impactful community-driven initiatives
- Honoured with a Special Award by Earthna Center for Sustainable Future** for continued dedication and contributions to Qatar Sustainability Week
- Presented with a special memento from Qatar Cancer Society** for ongoing support of cancer awareness initiatives



Our Memberships of Associations

Lulu Retail continues to strengthen its global presence through active participation in leading industry, trade, and business associations. These memberships provide valuable opportunities for collaboration, regulatory insight, networking, and advocacy across the markets in which we operate.

 <p>American Chamber of Commerce, Qatar (AmCham Qatar) AmCham Qatar promotes trade and investment between Qatar and the United States, offering a forum for business networking, latest updates, and commercial cooperation.</p>	 <p>Canadian-Qatari Business Forum Elite Membership Provides high-level access to Canada-Qatar trade initiatives with premium networking, market advisory support, and participation in events for enhanced visibility.</p>	 <p>Commonwealth Enterprise and Investment Council (CWEIC) CWEIC is a commercial, not-for-profit organisation that supports trade and investment across the 56 Commonwealth member countries.</p>	 <p>New Jersey Chamber of Commerce (NJCC) The NJCC provides advocacy, networking, and business resources that help companies expand their reach and understand evolving economic trends.</p>	 <p>World Economic Forum (WEF) World Economic Forum enhances global visibility, fosters high-level networking, and enables collaborative solutions on sustainability, global and regional challenges.</p>	 <p>Qatar British Business Forum (QBBF) QBBF is a non-profit organisation that supports trade and investment between Qatar and the UK, creating opportunities to develop relationships with businesses and professionals across the QBBF network.</p>
 <p>Greater Birmingham Chamber of Commerce (Patronage) Greater Birmingham Chamber of Commerce provides influential regional connections, insights on global trade trends, and expert guidance to navigate international markets.</p>	 <p>INCHAM Vietnam INCHAM Vietnam supports trade and investment between Vietnam and Indian market, providing a platform for business networking, forums, seminars, and trade fairs.</p>	 <p>Indiaspora Membership Enables participation in a global network of Indian-origin leaders with access to forums, leadership events, and initiatives that foster collaboration and strengthen US-India ties.</p>	 <p>Qatar Chamber of Commerce and Industry One of the oldest chambers in the GCC, the Qatar Chamber represents and supports the Qatari private sector, facilitating trade and strengthening the business environment locally and internationally.</p>	 <p>Qatari Businessmen Association (QBA) QBA contributes to Qatar's economic vision by accomplishing ambitious projects.</p>	 <p>Spanish Business Council, Qatar The Spanish Business Council promotes trade and investment between Spain and Qatar, offering members access to business events, networking, and visibility within its community.</p>
 <p>Institute of Export and International Trade, UK Membership of the Institute of Export and International Trade provides access to expertise, insights and updates on global trade rules, helping us navigate the complexities of international markets.</p>	 <p>International Chamber of Commerce (ICC)- Qatar ICC Qatar provides access to global trade insights, networking, and expert guidance to navigate international market challenges.</p>	 <p>Meadowlands Chamber of Commerce The Meadowlands Chamber supports economic development in the Meadowlands region, offering members access to local business networks, advocacy, and guidance.</p>	 <p>Swiss Business Council, Qatar The Swiss Business Council promotes economic and cultural ties between Switzerland and Qatar, enabling members to connect, collaborate, and explore new business opportunities.</p>	 <p>US-Qatar Business Council The US-Qatar Business Council facilitates commercial partnerships between the US and Qatar, supporting members with expert advice, assistance, and business-development opportunities.</p>	 <p>Victorian Chamber of Commerce and Industry The Victorian Chamber is a leading business organisation in Australia, offering access to Victoria's largest business network, providing programmes, resources, and support to build a strong and diverse business community.</p>

2025 ESG Highlights

Our ESG highlights capture the most significant progress we achieved across our environmental, social, and governance priorities during 2025. These results reflect the continued integration of sustainability into our operations, our focus on responsible growth, and our commitment to creating long-term value for all stakeholders.

Managing Our Environmental Impact



1.8% decrease

in energy intensity compared to 2024



4.9m kWh

of renewable solar electricity generated across UAE, Bahrain, and Saudi Arabia (**3.3m kg CO₂e emissions avoided**)



27 stores

in the UAE certified to ISO 14001:2015 Environmental Management System



55.5m

plastic bottles and cans collected for recycling through Reverse Vending Machines (**up from 31.8m in 2024**)



0.178 m³/sq. ft

water intensity in 2025, reflecting continued improvement in water efficiency

Creating Value for People and Communities



52,437

employees globally in 2025



9,698

females representing 18.5% of the workforce



10,637

new employees hired in 2025



1.2m

hours of training delivered (avg. 23 hours per employee)



USD 1.1m

donations and sponsorships in 2025 (~18% increase compared to 2024)

Advancing Responsible Governance



Zero

cases of bribery, corruption, or conflicts of interest reported in 2025



157,311

hours of human rights training delivered across the workforce



82.7%

of total procurement spend sourced from local suppliers (~4% increase compared to 2024)



Zero

incidents of data breaches, data loss, or cyber-attacks recorded in 2025



Established

Sustainability, Strategy and Investment Committee to oversee ESG priorities and long-term value creation

Integrating Sustainability Across Our Business

As a global retailer serving a vast customer base every day, Lulu Retail operates in a world where environmental pressures, social expectations, and regulatory demands continue to intensify. In this evolving context, sustainability is not an add-on to our business, it is fundamental to how we grow, serve our communities, and create long-term value. By reducing our environmental footprint, safeguarding the well-being of our people, strengthening local economies, and upholding responsible governance, we ensure that Lulu Retail remains resilient, future-ready, and able to deliver meaningful impact across every market we operate in.

BUILDING A SUSTAINABLE FUTURE

At Lulu Retail, sustainability is woven into the fabric of how we operate. It shapes our decisions, informs our long-term direction, and guides us as we work to build a resilient and responsible business. Sustainability is not a standalone initiative; it is an essential part of our strategic planning and operational culture.



ESG Governance and Policy

Our approach to responsible business conduct is grounded in strong ESG governance. Oversight of sustainability matters rests with our Board of Directors, ensuring that ESG considerations remain central to decision-making at the highest level.

To further strengthen governance in 2025, Lulu Retail established a Sustainability, Strategy & Investment Committee, enhancing Board-level oversight of ESG-related risks, opportunities, and long-term value creation.

At the Group level, our dedicated Sustainability Department, led by the Chief Sustainability Officer (CSO) and supported by the Sustainability Manager, oversees the integration of sustainability across the organisation. The CSO provides regular updates to the Board on key ESG matters, performance, and ongoing initiatives. To strengthen sustainability leadership capabilities, a nine month Leadership Development Programme was delivered for senior management, which included a dedicated ESG module. This programme supported a deeper understanding of ESG strategy, climate considerations, and responsible business practices across the leadership team.

The Sustainability Department continues to play a central role in managing our economic, environmental, and social impact, supporting the wider management team in embedding ESG considerations into strategic and operational planning. This work is guided by our ESG Policy, which establishes a clear framework across three dimensions:

- Environmental:** tackling climate change, conserving natural resources, and reducing our environmental footprint.
- Social:** fostering inclusive workplaces, supporting local communities, upholding human rights, and delivering safe and quality experiences to our customers.
- Governance:** ensuring transparency, accountability, and ethical conduct across our operations.

Key focus areas within our ESG Policy include:

- Climate Change**
- Environment**
- Employee Wellbeing**
- Health and Safety**
- Human Rights**
- Corporate Social Responsibility**
- Sustainable Sourcing**

For more information, please refer to our [ESG Policy](#).

Sustainability Champions

To strengthen sustainability ownership across our global footprint, Lulu Retail has established a network of Sustainability Champions representing our operations in all the regions where we operate. These Champions serve as focal points within their regions, collecting quantitative and qualitative data, supporting implementation of ESG initiatives, and reporting progress to the Group-level Sustainability Department. Their collaboration ensures consistency, accuracy, and alignment across the regions, with internal capability further strengthened through support from the Sustainability Department.








OUR STAKEHOLDERS

Lulu Retail's success depends on the trust and engagement of a wide network of stakeholders, including our customers, employees, suppliers, business partners, investors, and the communities we serve. Each group plays a meaningful role in influencing our sustainability direction, and we actively seek their perspectives as we shape our long-term ESG priorities.

We recognise that effective engagement goes beyond routine communication; it requires accessible platforms,

consistent dialogue, and genuine responsiveness. Across our global operations, we maintain multiple digital and in-person channels that allow stakeholders to share feedback, raise concerns, and stay informed about our progress. These channels help us remain connected to our workforce, strengthen collaboration with suppliers and partners, understand customer expectations, and stay attuned to the needs of local communities, ensuring that their voices continue to guide our sustainability journey.

STAKEHOLDER GROUP	MODE OF ENGAGEMENT	TOPICS RAISED
 Customers	<ul style="list-style-type: none"> Customer happiness centres for direct customer feedback Website and social media platforms Emails Dedicated telephone lines for direct engagement with team members 	<ul style="list-style-type: none"> Product availability and quality Customer satisfaction
 Employees	<ul style="list-style-type: none"> Regular contact through email Training sessions Enterprise social network 	<ul style="list-style-type: none"> Employment Employee engagement Workplace amenities Manpower management Health and safety
 Communities	<ul style="list-style-type: none"> CSR activities and events Press releases 	<ul style="list-style-type: none"> Sourcing from local communities Community engagement
 Suppliers	<ul style="list-style-type: none"> Meetings Joint initiatives Third party surveys 	<ul style="list-style-type: none"> Environmental impact Product safety and quality
 Business Partners	<ul style="list-style-type: none"> Meetings Joint initiatives 	<ul style="list-style-type: none"> Product safety Data security

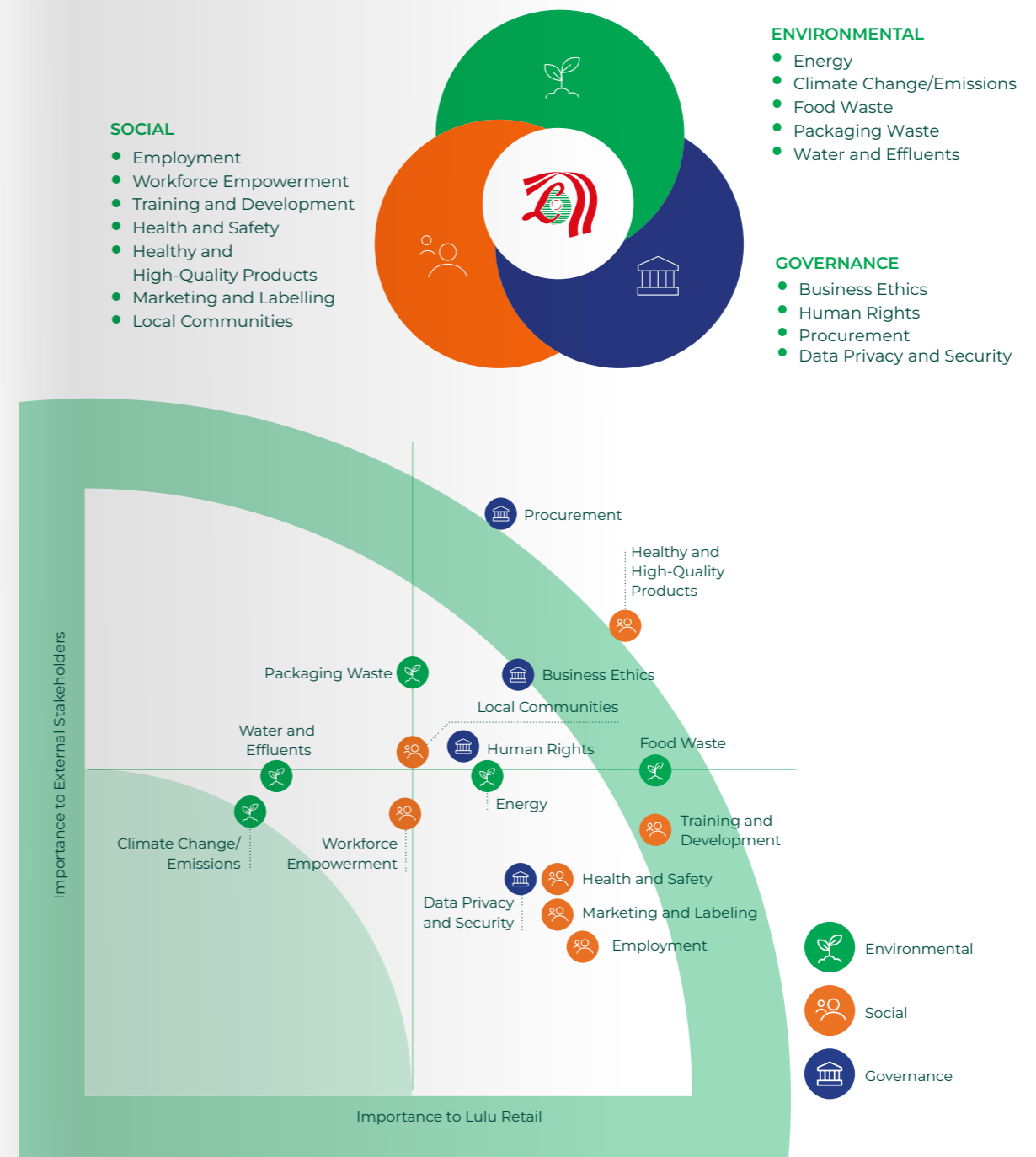


DEFINING WHAT MATTERS MOST

Lulu Retail's sustainability reporting efforts took shape in 2022 with the publication of our first ESG Report, marking a formal step toward understanding which ESG topics mattered most to our business and stakeholders. This exercise helped establish a clear set of priorities that continue to guide our approach today. The findings aligned naturally with our overall business direction, reinforcing the importance of environmental responsibility, social impact, and strong governance as core elements of how we operate.

Since then, we have worked to keep these priorities at the centre of our decision-making. We regularly revisit and track our material topics to ensure they remain relevant in a changing operating environment and to identify where we can further strengthen our contribution across our regions.

For a detailed explanation of our ESG materiality assessment process, please refer to our [2023 ESG Report](#).





Managing Our Environmental Impact

Environmental responsibility remains central to Lulu Retail's sustainability agenda. We recognise our role in safeguarding natural resources and reducing our environmental impact across our global operations. In 2025, we continue to prioritise actions that improve energy efficiency, lower emissions, minimise waste, and conserve water; ensuring that our business grows in a way that supports both present and future generations.

HIGHLIGHTS

1.8% decrease

in energy intensity compared to 2024



4.9m kWh

of renewable solar electricity generated across UAE, Bahrain, and Saudi Arabia (**3.3m kg CO₂e emissions avoided**)



27 stores

in the UAE certified to ISO 14001:2015 Environmental Management System



55.5m

plastic bottles and cans collected for recycling through Reverse Vending Machines (**up from 31.8m in 2024**)



0.178 m³/sq. ft

water intensity in 2025, reflecting continued improvement in water efficiency



MATERIAL TOPICS

- Energy
- Climate Change
- Emissions
- Food Waste
- Packaging Waste
- Water & Effluents

UN SDGS



Advancing Environmental Management

Environmental management is a core component of Lulu Retail's global strategy. Across all regions, we work to ensure that environmental considerations are embedded into everyday decision-making, supported by strong governance structures and continuous oversight. Regional management teams coordinate closely with operations, facilities management, and project teams to monitor performance, while the Board provides overarching supervision of key environmental and sustainability issues.

A central element of our approach is the systematic collection and monitoring of environmental data. We track key indicators, including energy consumption, greenhouse gas (GHG) emissions, water use, and waste generation, to assess performance trends and identify opportunities for improvement. Our network of Sustainability Champions plays an essential role in this process by ensuring data accuracy, identifying emerging risks, and supporting local implementation of environmental initiatives.

Across our global operations, Lulu Retail continued to enhance environmental performance through solar installations, energy-efficiency upgrades, responsible product offerings, and strengthened waste-management systems.

In the UAE, Lulu Retail operates a comprehensive Environmental Management System (EMS) aligned with ISO 14001:2015. In 2025, 27 stores across Dubai and Sharjah successfully achieved ISO 14001:2015 certification, supported by internal audits, and regular management reviews. Project and maintenance teams continue to oversee environmental initiatives, including LED lighting upgrades, solar installations, and water-efficiency improvements.

27

STORES IN THE UAE
ACHIEVED ISO 14001:2015
CERTIFICATION IN 2025.





Key Environmental Initiatives Across Operations

We continue to promote sustainable products and operational practices across our retail network. Examples include:



Sustainable Packaging and Plastic Reduction

Durable, reusable shopping bags are made available at the checkout counters to reduce single-use plastic consumption.



Responsible Waste Management

Waste contractors are selected through strict regulatory compliance criteria. Waste data is monitored at regional level and central levels to support reduction and increased recycling.



Environmentally Efficient Product Range

Stores offer a wide selection of Energy Star-certified appliances and electronics, supporting customer access to energy-efficient products.



Paper Reduction and Digitalisation

E-billing and paperless customer loyalty services minimise paper consumption across operations.



Energy Management and Efficiency

LED lighting, motion sensors in offices, and, where feasible, solar panel installations contribute to improved operational efficiency and reduced emissions.



Climate-Related Infrastructure Development

We have deployed solar projects across multiple regions, with active sites in the UAE, Bahrain, Saudi Arabia generating 4,991,492 kWh of green energy.

Looking ahead, Lulu Retail plans to expand renewable-energy initiatives to additional sites, reinforcing its commitment to low-carbon operations.

These initiatives align with the UAE Net Zero 2050, Saudi Vision 2030, and other GCC sustainability frameworks, reinforcing our commitment to renewable-energy adoption and emissions reduction.



GOVERNANCE AND OVERSIGHT

Environmental management across all the regions is guided by Lulu Retail's Group-level ESG Policy. Projects, maintenance, and sustainability teams work collaboratively to optimise energy consumption, maintain energy-efficient technologies, and identify further improvements through regular audits and performance reviews. The Sustainability, Strategy & Investment Committee provides additional oversight and ensures alignment with organisational priorities.

In Saudi Arabia, environmental management follows these same Group-level principles. Dedicated projects, maintenance, and operational teams monitor energy use, maintain efficient technologies such as LED lighting and high-efficiency appliances, and support continuous improvement through routine monitoring. Individual departments also implement energy-saving practices within their operations, with the Group Sustainability Department ensuring alignment and coordination across the Kingdom.

In Qatar, Lulu Retail has introduced pilot initiatives to reduce the environmental impact of logistics operations, including a backhauling project with Nestlé to optimise delivery routes and reduce empty runs, as well as pilot use of electric vehicles for deliveries. These initiatives support improved logistics efficiency and contribute to emissions-reduction efforts.

Across all regions, Lulu Retail remains committed to reducing emissions, minimising waste, and advancing circular economy principles. Through continued investments in renewable energy, efficiency programmes, sustainable product offerings, and certified management systems, we continue to strengthen the environmental performance of our global operations.



Accelerating Energy Efficiency and Climate Action

ENERGY

As global energy markets face increasing volatility driven by climate change and geopolitical uncertainty, enhancing energy efficiency and expanding renewable-energy adoption remain key priorities for Lulu Retail. We continue to work toward reducing our energy footprint by improving operational performance and steadily increasing the share of clean energy across our network.

Across our regions, Lulu Retail implements a range of initiatives to minimise both environmental and financial impacts from energy use. These efforts range from basic consumption monitoring and foundational improvements, such as LED lighting upgrades, to advanced programmes like energy-efficient Building Management Systems (BMS).

Energy and fuel use are monitored periodically across all outlets and facilities. This structured approach helps identify deviations, seasonal variations, and operational inefficiencies early, enabling timely corrective action. Insights from monitoring support:

- Optimising HVAC system performance
- Adjusting lighting schedules and efficiency
- Strengthening equipment maintenance practices
- Improving logistics efficiency and fuel use

Quarterly GHG data verification further enhances the accuracy of our emissions profile and support long-term emission-reduction planning.



EXPANDING RENEWABLE ENERGY

A core pillar of Lulu Retail's energy-transition strategy is the large-scale integration of solar power across its regional operations. We have initiated, deployed, and advanced multiple rooftop solar projects across Bahrain, the UAE, and Saudi Arabia, generating a total of 4,991,492 kWh of clean electricity and avoiding approximately 3,345,914 kg CO₂e in the reporting year. Active installations across these markets currently span six operational sites, delivering measurable reductions in carbon intensity and enhancing overall energy efficiency.

Momentum continues to build, with 20+ additional solar projects representing a significant combined capacity. This portfolio includes active, ongoing, and planned installations across the GCC. Once fully commissioned, these systems are expected to generate millions of kilowatt-hours of clean energy annually, significantly lowering reliance on fossil-fuel-based electricity and accelerating our decarbonisation pathway.

DIGITAL MONITORING AND SMART ENERGY MANAGEMENT

Digital monitoring technologies such as Schneider EcoStruxure™ Power Monitoring Expert provide insights into energy consumption and enable data-driven optimisation. These insights inform cost-efficiency programmes, staff training, and targeted operational adjustments.

In Saudi Arabia, Lulu Retail operates a mature technology-enabled energy-management model, integrating smart LED systems, HVAC controls, and refrigeration-monitoring tools. Variances in energy performance are escalated promptly, in alignment with international standards and national Saudi Energy Efficiency Center (SEEC) guidelines.



BUILDING A CULTURE OF EFFICIENCY

Energy-conservation training is delivered in our regions to reinforce practical measures that reduce energy consumption. The training focuses on actionable steps such as switching off unused equipment, optimising temperature settings, and improving refrigeration efficiency. These initiatives aim to embed energy-conscious practices into daily operations, supporting broader sustainability goals.

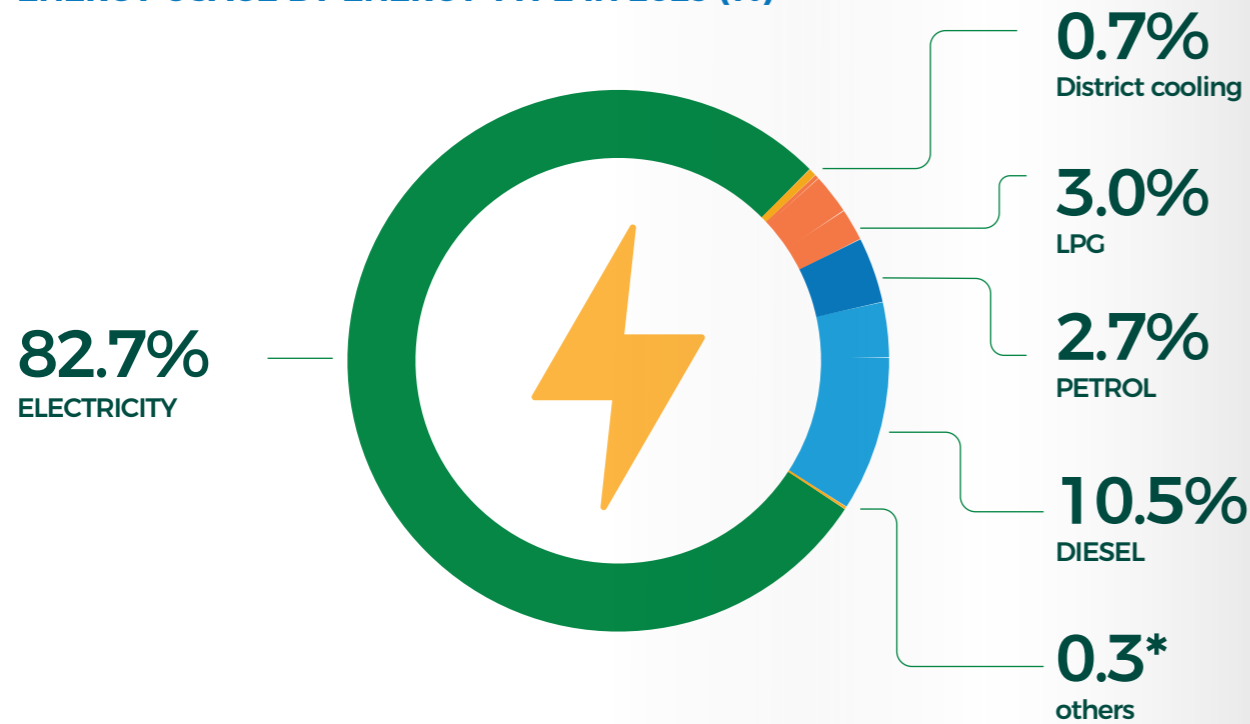
Across all regions, Lulu Retail continues to embed a culture of energy efficiency by expanding renewable-energy capacity, strengthening monitoring systems, upgrading infrastructure, and enhancing employee engagement. Looking ahead, we aim to further improve energy performance across our global operations by implementing targeted energy efficiency measures.

Total energy and grid electricity consumption increased between 2023 and 2025, reflecting operational growth across Lulu Retail's global footprint. Despite this increase, energy intensity improved year-on-year, declining from 0.313 GJ/sq. ft in 2023 to 0.306 GJ/sq. ft in 2025, demonstrating continued progress in energy efficiency and operational optimisation.

INDICATOR	UNIT	2023	2024	2025
Total Energy Consumption	GJ	4,255,188	4,415,983	4,565,372
Grid Electricity Consumption	MWH	977,253	1,002,338	1,043,291
Energy Intensity	GJ/sq. ft	0.313	0.312	0.306

Note: Consumption values are rounded to the nearest whole number.

ENERGY USAGE BY ENERGY TYPE IN 2025 (%)



*Others include CNG, Biodiesel and Natural Gas

CASE STUDY

LULU RETAIL'S SOLAR ENERGY TRANSITION IN THE UAE

Lulu Retail is accelerating its clean-energy transition through the large-scale installation of rooftop solar photovoltaic (PV) systems across five sites in Dubai, supporting the UAE Clean Energy Strategy and reinforcing the Group's commitment to reducing carbon emissions, strengthening energy resilience, and optimizing long-term operating costs.

Implementation Approach

To deliver this programme, Lulu Retail partnered with Positive Zero for the design, installation, and maintenance of solar systems. The rollout is being executed in phased stages to avoid operational disruption, backed by feasibility studies, roof-load assessments, and coordinated regulatory approvals. Advanced real-time solar monitoring platforms and preventive maintenance schedules ensure optimal system performance and longevity.

Current Progress

The initiative covers five key sites in Dubai:

- Lulu Hypermarket, Al Warqa - Ongoing (539.4 kWp)
- Lulu Hypermarket, Rashidiya - Ongoing (426.0 kWp)
- Lulu Hypermarket, Dubai Investments Park (DIP) - Active (464.6 kWp)
- Lulu Central Logistics, DIP - Ongoing (583.1 kWp)
- Lulu Regional Office, Dubai - Ongoing (129.4 kWp)

Combined, these projects represent a total planned capacity of 2,142.5 kWp. The solar site at DIP Hypermarket is already energised, with the remaining sites scheduled for activation by next year.

IMPACT

Once operational, the systems are projected to reduce annual GHG emissions by approximately 2,500 tonnes, contributing to Lulu Retail's long-term climate action goals. The shift to solar will also deliver sustained cost optimisation by reducing reliance on grid electricity.

Looking ahead, Lulu Retail plans to expand the solar programme further, reinforcing its leadership in renewable energy adoption across UAE operations.



"Our solar transition is more than an energy project—it's a bold step toward shaping a sustainable future. By aligning with the UAE's clean-energy vision, we are reducing emissions, enhancing energy resilience, and creating long-term operational value. This initiative underscores Lulu Retail's unwavering commitment to climate leadership and responsible growth."

Salim MA
Group Director - Global Operations

CLIMATE ACTION

Climate change continues to reshape global systems, influencing weather patterns, resource availability, and the resilience of communities and supply chains. These shifts present tangible operational and strategic challenges for businesses. Lulu Retail recognises the need for a proactive and long-term response, strengthening our ability to anticipate, manage, and adapt to evolving climate conditions across our global operations and value chain.

Strengthening Emissions Management and Climate Governance

As a business with emissions spanning a wide value chain, Lulu Retail acknowledges its responsibility to contribute meaningfully to climate action. We continue to enhance the accuracy and completeness of our Scope 1 and Scope 2 emissions measurement while laying the groundwork for comprehensive Scope 3 management. This includes identifying material categories, improving data availability, and expanding monitoring and reporting systems. These efforts support the development of our long-term Net Zero pathway and align with international climate expectations.

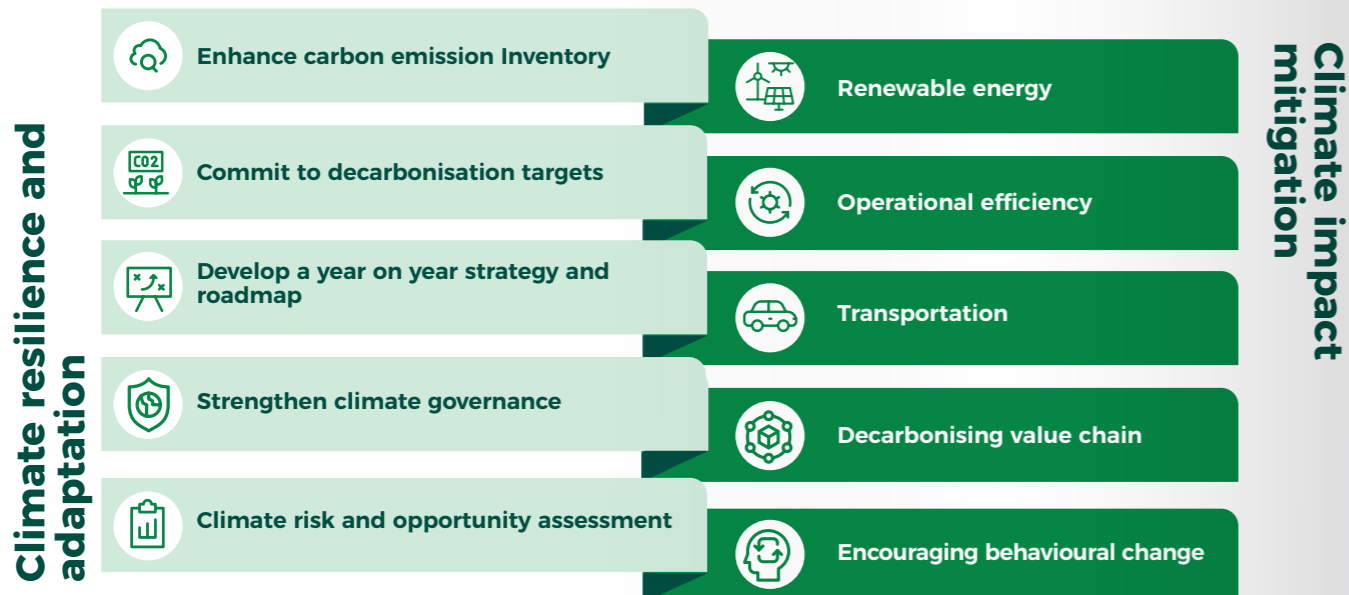
To strengthen climate resilience, we are advancing climate risk assessments including identification of physical and transition climate risks and scenario analysis of key risks aligned with IFRS S2 and informed by the TCFD framework. This work helps us understand how different climate pathways may impact our operations, supply chain, and market exposure. In parallel, we continue preparing for broader IFRS S1 and S2 requirements by strengthening data systems, governance structures, and risk-assessment methodologies.

Net Zero Strategic Action Plan

Lulu Retail has developed a comprehensive baseline of its Scope 1, 2, and 3 GHG emissions and formulated a climate strategic action plan to reduce emissions in line with global climate standards while reflecting the UAE's climate context and vision. To develop a holistic approach to decarbonisation and plan its journey for Net Zero, Lulu Retail adopted a strategic action plan structured around two key pillars, each supported by specific themes. Looking ahead, we propose submitting the climate targets and action plan for formal approval by the Sustainability, Strategy & Investment Committee.

Climate Resilience Preparedness and Risk Assessment

Lulu Retail conducted a comprehensive climate risk and opportunity assessment aligned with the TCFD framework and IFRS S2 standards. Using internationally recognised scenarios from the International Energy Agency (IEA) and Inter-governmental Panel on Climate Change (IPCC), the analysis evaluated both transition risks—such as regulatory changes, carbon pricing, and technology shifts—and physical risks including extreme weather events, water stress, and infrastructure vulnerability. Scenario analysis across short-, medium-, and long-term horizons informed strategic planning for strategic alignment and resilience building. Key opportunities identified include operational efficiency improvements, early adoption of low-carbon technologies, innovation in water-efficient solutions, and enhanced brand reputation through leadership in climate adaptation. These insights underpin Lulu Retail's climate resilience strategy, ensuring readiness to manage risks while leveraging opportunities for sustainable growth.



Operational Climate Action Initiatives Across Markets

Lulu Retail advances climate action through energy-efficiency improvements, low-carbon mobility, digitalisation, responsible resource use, and renewable-energy expansion. Together, these initiatives reduce emissions across our global operations.



Low-Carbon Mobility and Fleet Efficiency

- In the UAE, fleet management focuses on route optimisation, reduced fuel consumption, and disciplined vehicle maintenance supported by efficiency tracking
- Spain has adopted hybrid vehicles
- Italy has transitioned to battery electric vehicles (BEVs)
- Qatar is progressing toward the adoption of electric vehicles
- In the UAE, our transportation fleet uses biodiesel produced from our Used Cooking Oil by a third party

Responsible Resource Use and Digitalisation

Digitalisation plays a key role in reducing emissions by minimizing resource use and enhancing operational efficiency. Initiatives include replacing printed materials with digital versions, introducing e-billing and digital receipts to cut paper consumption, and implementing e-waste management programmes that ensure environmentally compliant processing of end-of-life electronics through certified contractors.

Across all regions, Lulu Retail continues to embed a culture of climate responsibility through operational improvements, cleaner technologies, renewable-energy adoption, digitalisation, and structured emissions management. These combined actions support our long-term ambition to reduce emissions, lower resource intensity, and strengthen the resilience of our global retail operations in the face of evolving climate challenges.



GHG Performance

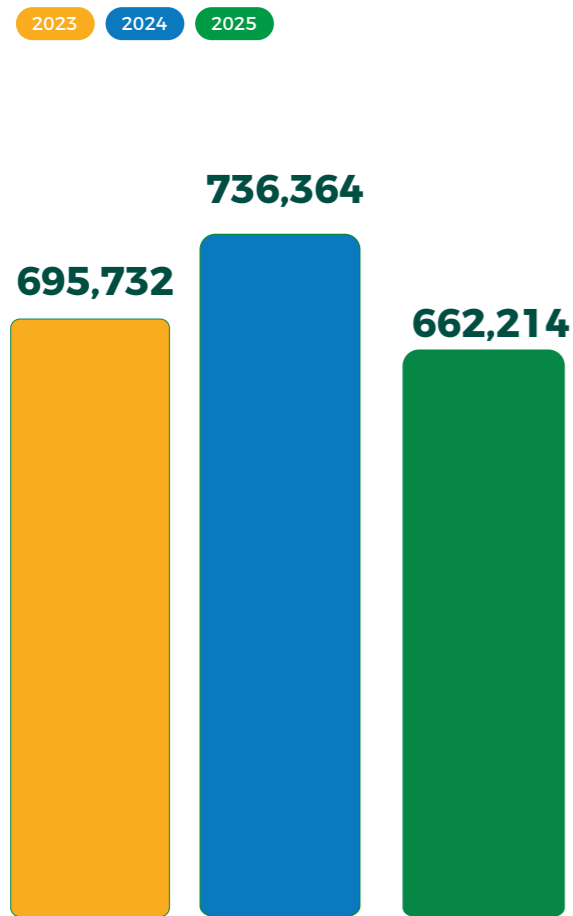
GHG emissions declined in 2025 compared to 2024 across both scopes. Scope 1 emissions decreased from 214,252 tCO₂e in 2024 to 172,109 tCO₂e in 2025, while Scope 2 emissions fell from 522,112 tCO₂e to 490,105 tCO₂e, reflecting an overall improvement in emissions performance during the reporting year.

INDICATOR	UNIT	2023	2024	2025
Scope 1 GHG emissions*	tCO ₂ e	195,188	214,252	172,109
Scope 2 GHG emissions	tCO ₂ e	500,544	522,112	490,105

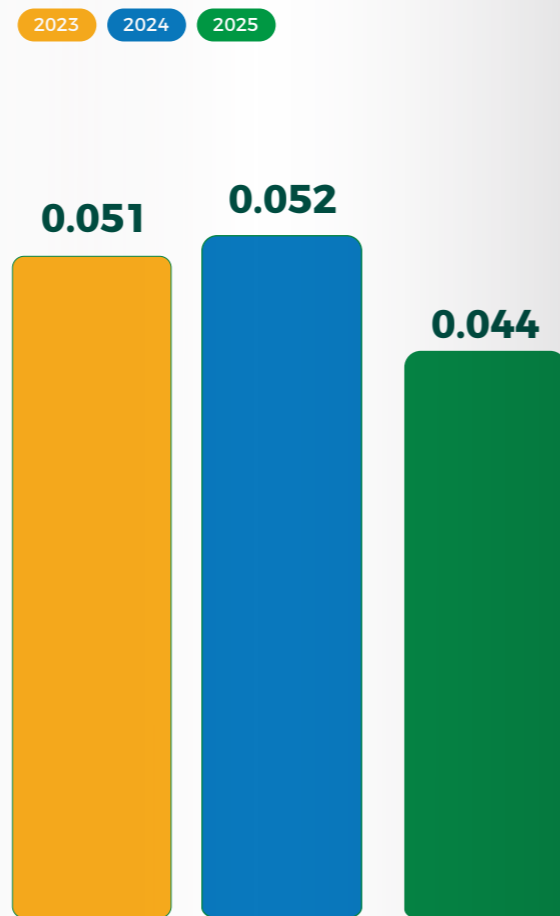
Note: Values are rounded to the nearest whole number.

*Scope 1 GHG emissions exclude non-Kyoto gases in line with the GHG Protocol Corporate Standard.

Total Scope 1 and 2 GHG emissions (tCO₂e)



Scope 1 and 2 GHG emissions intensity (tCO₂e/retail space sq. ft.)



INDICATOR	UNIT	2025
Total scope 3 emissions	tCO ₂ e	597,463

For a summary of the GHG emissions calculation methodology, calculation approach, and emission factor sources by scope and category, please refer to [Appendix E](#).

PROJECT SPOTLIGHT

ADVANCING SOLAR ENERGY ACROSS THE REGION

As part of our commitment to sustainability and renewable energy integration, we have initiated and progressed multiple solar projects across key regions. These projects demonstrate our strategic approach to reducing carbon emissions and enhancing energy efficiency.

Country	Active Site	Solar Electricity Generation in kWh	Emissions Saved in kgCO ₂ e	% from Solar Since Activation ¹
Bahrain	Site 1	1,641,325	1,145,153	56.2%
Bahrain	Site 2	1,938,786	1,352,691	17.6%
Bahrain	Site 3	112,529	78,511	6.7%
United Arab Emirates	Site 1	29,884	10,716	6.5%
Saudi Arabia	Site 1	811,314	485,166	17.0%
Saudi Arabia	Site 2	457,653	273,677	17.8%

Note: Values are rounded to the nearest whole number.

4,991,492 kWh²
Total Solar Energy Generation from the above sites

3,345,914 kg CO₂e
Emissions Saved

Driving Impact and Emission Reduction

In addition to the sites listed above, more than 20 additional locations are currently in planning or execution stages. Once operational, these installations are expected to generate millions of kilowatt-hours of clean electricity annually, significantly reducing greenhouse gas emissions and lowering reliance on fossil fuels. By scaling solar adoption across multiple geographies, we are accelerating the transition to a low-carbon economy and delivering long-term environmental and operational benefits.

Alignment with Regional and Global Net Zero Goals

Our solar programme aligns with and supports the UAE Net Zero by 2050 Strategic Initiative, contributing to the nation's transition toward sustainable, low-carbon growth. It is also aligned with the UAE Federal Decree-Law No. 11 of 2024, which reinforces the national mandate to measure, report, and actively reduce greenhouse gas emissions. In addition, the programme complements broader GCC sustainability agendas—including Saudi Arabia's Vision 2030, Qatar National Vision 2030, and Oman's Energy Transition Strategy—which prioritise renewable energy adoption and climate resilience. Through these projects, we are positioning ourselves as a regional leader in clean energy, contributing to global climate commitments and ensuring resilience for future generations.

¹% of Solar Since Activation" reflects the contribution of renewable energy from the month the solar plant became operational.
²UK site data is not included.

Promoting Circularity and Waste Reduction

Lulu Retail continues to strengthen circularity across its global operations by prioritising waste prevention, increasing reuse, and improving recycling practices. As one of the region’s largest retailers, we recognise our influence across the value chain and the role we play in reducing waste generation at every stage, from procurement and store operations to customer engagement. Our ambition is to move steadily away from traditional linear models by minimising waste at the source, extending the life of materials, and supporting responsible disposal.

Across our regions, waste-management practices include segregation at source, collaboration with authorised waste contractors, and compliance with local regulatory requirements. Our regions monitor waste-generation trends to identify opportunities for improvement, enhance recycling performance, and support the gradual

adoption of circular-economy approaches. Although waste streams differ by location, ranging from food and packaging waste to cardboard, plastics, cooking oil, and e-waste, our commitment to responsible resource use remains consistent.



CIRCULARITY STRATEGY

As part of our long-term circularity strategy, Lulu Retail focuses on reducing waste, conserving resources, and promoting sustainable practices across our operations. Building on past initiatives, we continue to expand programmes that keep materials in use for longer, reduce dependency on virgin resources, and improve recycling infrastructure.

Electronic Waste Take-Back



Our electronics trade-in programme encourages customers to return old devices in exchange for discounts. Returned items are sent for recycling or repurposing, supporting a more sustainable lifecycle for electronic products and reducing landfill volumes.

Recycling Used Cooking Oil



At multiple locations, used cooking oil is collected and recycled into biodiesel. In the UAE, we utilise this biodiesel to fuel company operations, converting waste into a valuable resource while reducing carbon emissions.

Reverse Vending Machine (RVM) System



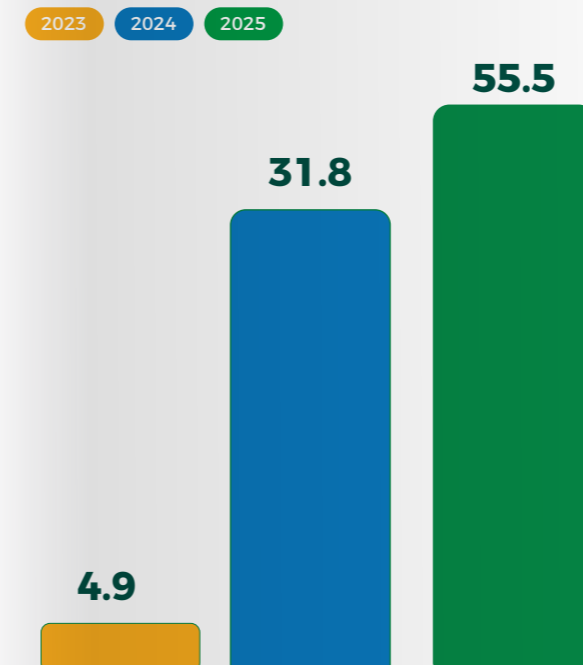
Our RVM initiative has significantly increased consumer recycling participation. In 2025, our RVMs collected over 55 million bottles and cans, up from 31.8 million bottles and cans in 2024, demonstrating strong customer engagement and helping reduce plastic waste across the UAE and Qatar.

Textile Waste Reduction



In the UAE, our uniform take-back programme allows customers to return used school uniforms, which are recycled through third-party partners to prevent textile waste from reaching landfills. This year, we rolled out this engagement activity across 50 stores in the UAE.

Plastic bottles and cans collected for recycling via RVM (# in millions)



ADDITIONAL CIRCULAR ECONOMY INITIATIVES

Lulu Retail also advances circularity by promoting eco-friendly products and sustainable packaging solutions. In the UAE, we launched an initiative that provides dedicated spaces where customers can access energy star-certified electronics. In addition, several regions continue to expand the use of environmentally preferable materials, compostable and reusable alternatives, and eco-friendly shopping bags made from jute, cotton, paper, or woven materials. In Saudi Arabia, a plastic-free prototype shop, developed in partnership with NEOM, reinforces national efforts to phase out single-use plastics.

Operational improvements further support climate-mitigation objectives. Enhanced segregation, increased recycling of packaging materials, and authorised disposal of non-recyclables reduces landfill dependency and promotes more circular material flows. Combined with staff training, customer engagement, and partnerships with suppliers and contractors, these efforts strengthen material recovery and advance Lulu Retail’s long-term circular-economy aspirations.

FOOD WASTE

Lulu Retail manages food waste through inventory optimisation, responsible handling, and external partnerships where feasible. Outlets implement structured stock-rotation systems (such as FIFO), maintain strict temperature controls, and apply digital inventory tools to reduce spoilage. Training and awareness reinforce best practices across departments.

Several regions have implemented food-waste-reduction procedures, along with additional measures such as discounting near-expiry items, refining production planning, and improving storage conditions.

Where redistribution is possible, Lulu Retail collaborates with local authorities and charitable organisations. In the UAE, discussions with regulatory bodies and Emirates Red Crescent continue to explore compliant redistribution pathways. Qatar region regularly reviews departmental waste and implements reduction strategies such as controlled preparation and stock rotation.

Overall, Lulu Retail continues to strengthen systems that prevent food waste at the source, support responsible redistribution, and ensure compliance with local regulations.

PACKAGING WASTE

Packaging waste is one of the largest waste streams across our operations, and Lulu Retail is optimising resource use, increasing recycling, and promoting sustainable alternatives. Segregation of cardboard, plastics, and other recyclables is implemented across multiple markets, with materials collected by authorised contractors. In the UAE, segregation of cartons, plastics, cooking oil, and e-waste is well established and supported by regular staff training. Digitalisation, such as e-billing and paperless order processing, further reduces paper and packaging usage



CASE STUDY

CLOSING THE LOOP – USING RECYCLED COOKING OIL TO FUEL LULU RETAIL’S UAE FLEET

Lulu Retail’s UAE operations have been recycling used cooking oil (UCO) through a certified third-party, with cumulative volumes tracked and reported over time. On World Environment Day, we achieved a major sustainability milestone by powering our transportation fleet with biodiesel produced from used cooking oil (UCO) collected from our UAE stores. Lulu Retail transforms waste oil into clean, low-emission fuel, reducing carbon footprint and promoting a circular economy.

KEY METRICS:

280,474 L
(3-year cumulative)
Biodiesel generated

295,235 L
(3-year cumulative)
UCO recycled

Environmental Impact

- CO₂e saved: 481,209 kg**
Equivalent to:
 - Emissions from 112 gasoline-powered passenger vehicles driven for one year
 - Carbon sequestered by 7,957 tree seedlings grown for 10 years

Supports UAE Net Zero by 2050 Strategy

Circular Economy Benefits

- Fulfils UAE Circular Economy Policy (2021-2031)**
- Converts waste cooking oil into valuable fuel, preventing improper disposal and environmental contamination**
- Supports sustainable logistics and resource efficiency**



“Transforming used cooking oil into clean fuel closes the loop within our value chain and reinforces our commitment to a circular economy. This initiative not only reduces emissions but also turns waste into a valuable resource that powers our logistics sustainably.”

Mohamed Althaf
Group Director - Global Operations and Chief Sustainability Officer



Across the GCC, we are transitioning away from single-use plastics by introducing reusable bags, oxo-biodegradable options, and compostable food-packaging alternatives such as sugarcane-based containers. Our refill stations allow customers to bring their own packaging, directly reducing consumer-level waste. Italy, the UK, and the USA maintain strong recycling systems aligned with national regulations, while contractor-led segregation supports efficient waste handling.

Saudi Arabia follows national waste-management regulations and increasingly embeds reduce-reuse-recycle principles into daily operations. Initiatives include promoting eco-friendly bags, partnering with specialist recyclers, and encouraging customers to adopt reusable alternatives. In the UAE and many other regions, segregation and recycling of cooking oil, cartons, wood, metal, plastics, and e-waste are regularly monitored, with data reviewed by in-house teams to guide further improvement.

Total waste generated increased slightly in 2025 compared to 2024, reflecting higher operational activity. Recycling performance remained stable, with total waste recycled increasing marginally year-on-year. Used cooking oil volumes declined in 2025 following higher collection levels in 2024, while recycled cooking oil volumes remained aligned with total collection, supporting continued waste-to-resource practices.



INDICATOR	UNIT	2023	2024	2025
Total waste generated	Tonnes	132,946	134,754	136,144
Total waste recycled*	Tonnes	27,177	34,136	34,667
Used cooking oil	Liters	339,385	467,848	365,243
Recycled cooking oil	Liters	299,116	398,643	365,243

Note: Values are rounded to the nearest whole number.
*Includes food waste along with other waste categories

Enhancing Water Stewardship

WATER AND EFFLUENTS

Responsible water use is increasingly critical as global water scarcity intensifies, especially for Lulu Retail, given our strong presence in water-stressed regions across the Middle East. Efficient water management is therefore a core component of our sustainability approach, ensuring water is used responsibly while upholding the highest standards of hygiene, food safety, and operational performance.

Water used across our operations is sourced from local municipal suppliers and discharged through authorised municipal drainage systems in line with regulatory requirements. To protect wastewater networks, food-preparation areas in every market are equipped with grease interceptors that prevent oils and solids from entering drainage systems. These measures support environmental compliance and help safeguard community water resources.

Across our operating regions, Lulu Retail continues to strengthen water efficiency through conservation technologies, structured monitoring, and awareness programmes. Many locations have installed tap sensors, aerators, and low-flow fixtures to minimise unnecessary consumption. In the UAE, for example, efficiency measures include water-saving devices and improved wastewater quality through grease-trap installations. We also complement technological measures with awareness posters, regular staff training, and defined reduction measures to achieve water efficiency.

In Saudi Arabia, water use is monitored closely in accordance with national regulations, international standards, and internal environmental guidelines. Any

abnormal increase in consumption is escalated through an internal verification and corrective-action process. Employee awareness sessions reinforce responsible behaviours and support efficient water use across daily operations.

In Oman, reverse osmosis (RO) systems are used in fresh-food areas to ensure safe and efficient water purification. In Qatar, conservation efforts include the promotion of aerators, staff training, and continuous awareness activities that encourage reduced consumption.

The region has also established an internal target to reduce water consumption as part of its annual key performance indicators. This commitment is supported by training programs, the installation of aerators, a gradual shift to GCC Green Label-certified products, and annual monitoring of water-consumption data to track performance and improvement.

Across all regions, Lulu Retail remains committed to reducing water use, enhancing efficiency, and safeguarding water resources. Through conservation technologies, operational improvements, and active employee engagement, we continue to strengthen our approach to water stewardship and contribute to broader regional and global sustainability goals.

Total water consumption increased slightly in 2025 compared to 2024, reflecting operational growth. Despite this increase, water intensity continued to improve, declining from 0.186 m³/sq. ft in 2024 to 0.178 m³/sq. ft in 2025, demonstrating continued progress in water-efficiency measures across operations.

INDICATOR	UNIT	2023	2024	2025
Total Water Consumption	m ³	2,632,314	2,633,117	2,657,614
Water Intensity	m ³ / sq. ft.	0.194	0.186	0.178

Note: Consumption values are rounded to the nearest whole number.



Creating Value for People and Communities

At Lulu Retail, people are at the heart of our global success. Across all our regions, we work to create a supportive and inclusive environment where employees feel valued, empowered, and equipped to contribute to our growth. Our commitment extends beyond our workforce to the communities we serve, where we aim to deliver positive social impact through responsible practices, meaningful engagement, and initiatives that support long-term wellbeing. As our operations expand, we continue to strengthen our approach to workforce development, diversity, safety, and community contribution, ensuring that every region advances in alignment with our group-wide values.

HIGHLIGHTS

52,437
employees globally in 2025



18.5% (9,698)
female workforce representation in 2025



10,637
new employees hired in 2025



1.2m hours
of training delivered (avg. 23 hours per employee)



USD 1.1m
donations and sponsorships in 2025 (~18% increase compared to 2024)



MATERIAL TOPICS

- Employment
- Workforce Empowerment
- Training & Development
- Health & Safety
- Healthy & High-Quality Products
- Marketing & Labelling
- Local Communities

UN SDGS



Building Workforce Resilience

Building a resilient workforce begins with ensuring that our people have the support, tools, and opportunities they need to thrive. Through structured Human Resource (HR) systems, fair and transparent employment practices, and strong employee engagement foundations, we cultivate an environment where individuals feel empowered to contribute to our collective success. As we expand, Lulu Retail continues to strengthen processes that enhance stability, wellbeing, and productivity across all teams.

At the Group level, workforce resilience is anchored in strong HR governance supported by SAP SuccessFactors, ISO-certified HR procedures, digital grievance channels, and structured employee onboarding. These systems ensure clarity, consistency, and compliance across all markets, while allowing each region to tailor its people practices to local regulations and operational realities.

Our HR framework emphasises comprehensive recruitment and onboarding, performance management, and incentive programmes, complemented by vibrant engagement practices

such as wellness initiatives, sports activities, cultural celebrations, and team-building exercises. We have implemented ISO 9001:2015 certification, recognizing that our HR processes for recruitment, training, and Human Resources Management System (HRMS) adhere to international quality standards, ensuring efficiency and continuous improvement. The rollout of SAP SuccessFactors Phase 1, including Employee Central, has streamlined core HR functions by centralizing employee data, digitizing leave applications, and exit approvals thereby improving efficiency and employee experience.



Employee engagement remains a key priority, supported by structured programmes such as satisfaction surveys, recognition awards, and career development initiatives. Our approach includes regular salary reviews, benchmarking against market standards, and offering competitive compensation and benefits. We also provide targeted training programmes, mentorship opportunities, and leadership development to foster career growth and succession planning.

To promote diversity and inclusion, we have established practices aimed at hiring and retaining underrepresented groups, including women and People of Determination, supported by our Human Rights Policy. Additionally, we maintain strong commitments to nationalisation, with programmes designed to empower young talent and provide long-term career opportunities.

Workforce resilience is further reinforced through health and wellness programmes, structured grievance mechanisms, and compliance-driven HR practices that uphold fairness, transparency, and employee wellbeing across all operations.

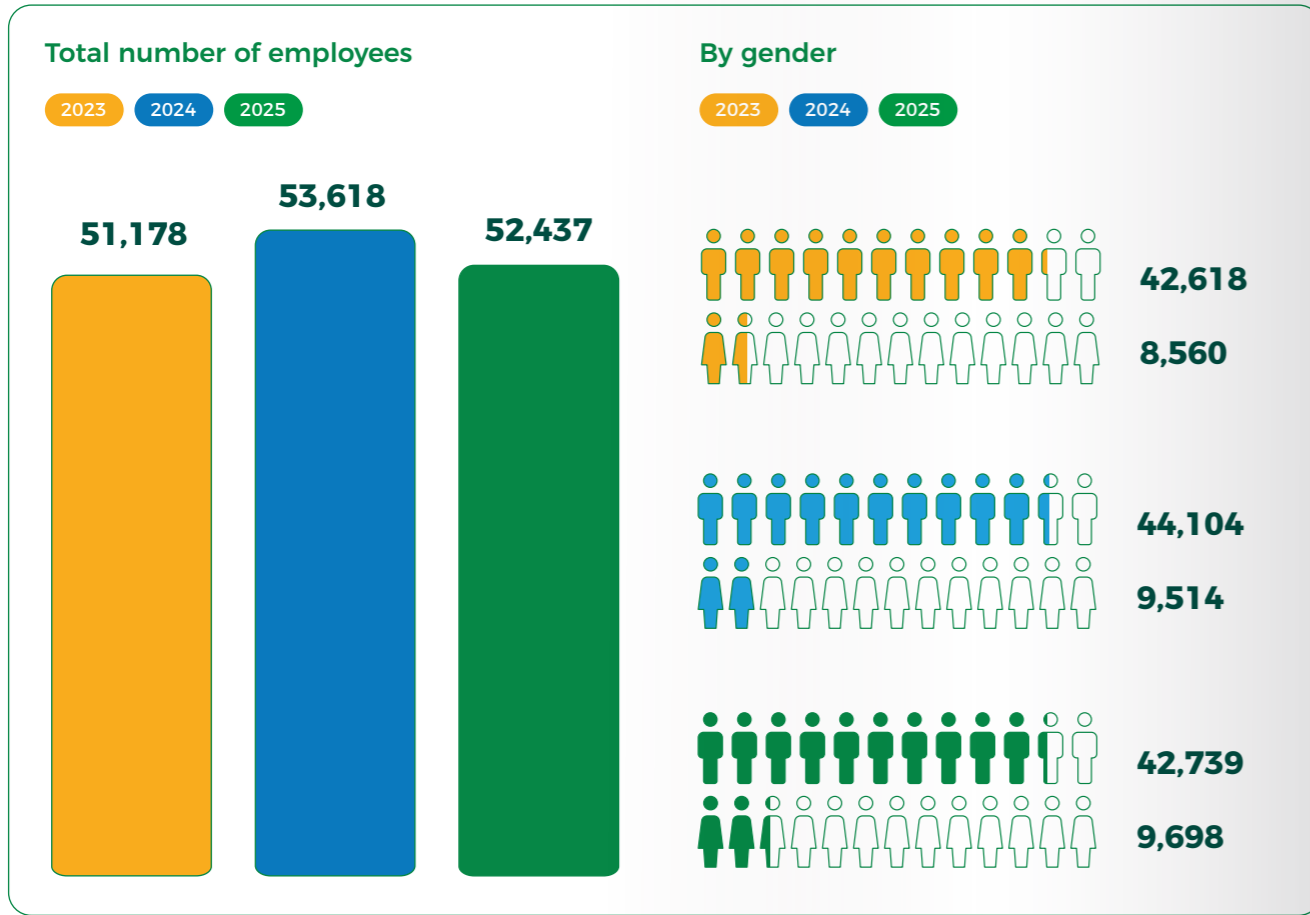
Across all regions, a strong culture of employee

engagement further sustains resilience. Activities such as sports events, cultural celebrations, team-building programmes, welfare support, and wellness campaigns promote cohesion and belonging. Medical insurance coverage, wellbeing initiatives, walkathons, health-awareness sessions, and proactive welfare support are embedded into workforce practices. Employees are consistently informed of available health benefits and support systems, ensuring they remain empowered to maintain their wellbeing. In regions such as Qatar, this is further strengthened through team-building sessions, family gatherings, and cultural activities that foster community and shared identity.

Through these aligned yet locally adapted approaches, Lulu Retail continues to build a resilient, motivated, and well-supported workforce capable of driving sustainable growth across all regions.

In 2025, Lulu Retail employed 52,437 people globally, with most of our workforce based in the Middle East (50,706 employees), reflecting the scale of our operations across the region. This year, our female workforce representation increased to 9,698 employees (approximately 18.5% of total employees).





INDICATOR	UNIT	2023	2024	2025
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By age				
Age Group	UNIT	2023	2024	2025
18-25	#	14,163	12,536	11,415
26-35	#	23,173	25,101	24,546
36-55	#	13,472	15,482	15,942
55+	#	370	499	534

INDICATOR	UNIT	2023	2024	2025
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Employee count by region				
Region	UNIT	2023	2024	2025
Middle East	#	49,738	52,087	50,706
East & South Africa	#	37	35	39
Europe	#	106	94	122
North America	#	61	54	84
South Asia	#	933	1,056	1,133
Southeast Asia	#	303	287	341
Oceania	#	0	5	12

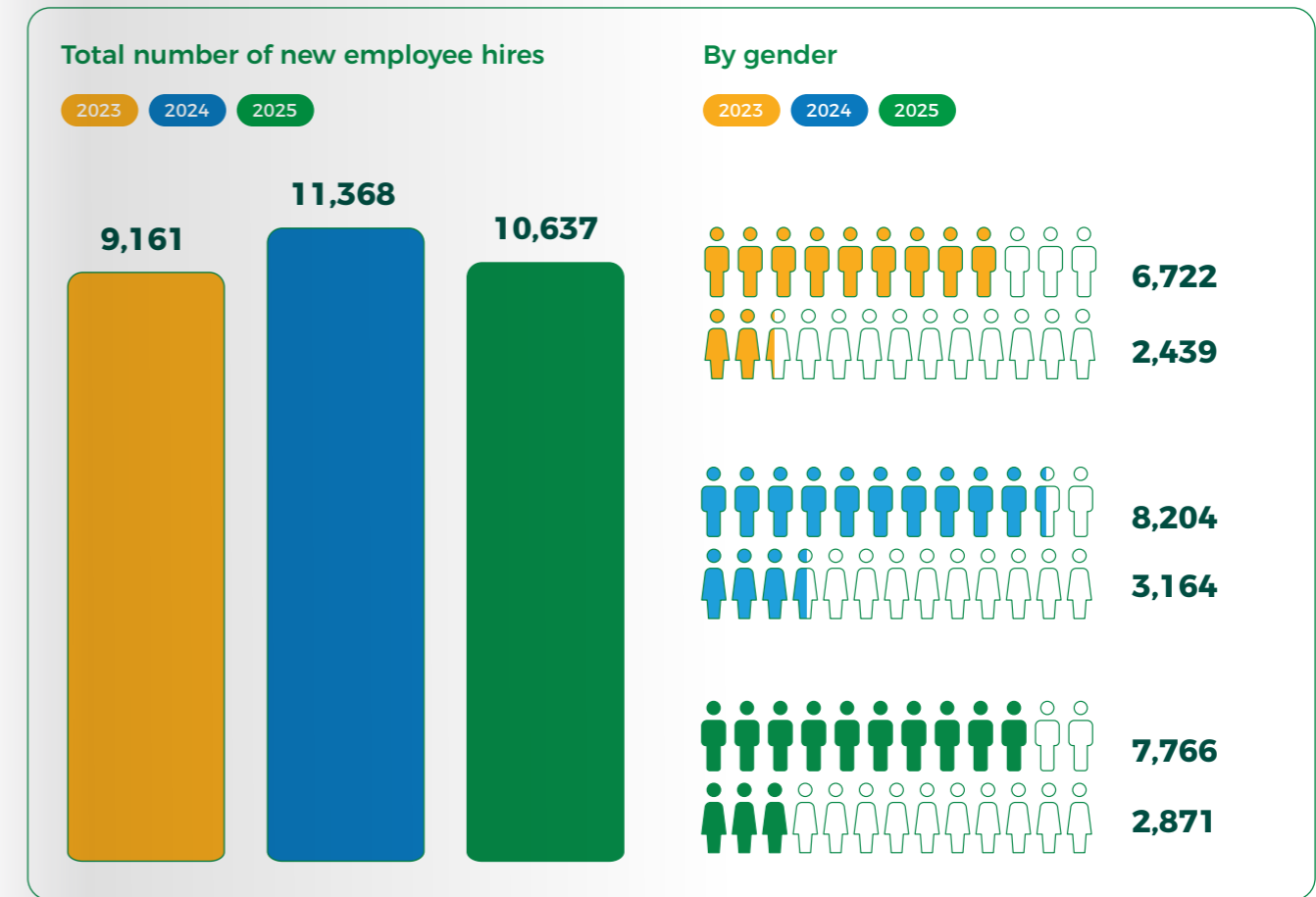
HIRING

Developing the next generation of employees is essential to our long-term success. Lulu Retail remains committed to attracting young and promising talent across all the countries where we operate, while also fostering an environment where employees choose to build meaningful, long-term careers. Many of our team members have been with us for several years, reflecting both their dedication and the supportive culture we strive to maintain.

As part of our continual improvement approach, we conduct structured exit interviews whenever an

employee leaves the organisation. The insights gathered help us better understand the employee experience and guide ongoing enhancements to our workplace practices.

In 2025, Lulu Retail hired a total of 10,637 new employees. Recruitment continued to be concentrated in younger age groups, with 5,640 hires aged 18-25 and 4,221 aged 26-35, while 768 hires were aged 36-55. Hiring of employees aged 55+ reached 8, reflecting continued recruitment across a wider range of age groups.



INDICATOR	UNIT	2023	2024	2025
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New hires by age				
Age Group	UNIT	2023	2024	2025
18-25	#	5,433	6,135	5,640
26-35	#	3,192	4,453	4,221
36-55	#	528	776	768
55+	#	8	4	8



EMPLOYEE ENGAGEMENT

A motivated and connected workforce is essential to sustaining high levels of productivity, service quality, and organisational stability. In 2025, Lulu Retail continued to strengthen employee engagement by offering diverse opportunities for our people to connect, collaborate, and feel valued across all regions. Our engagement initiatives

are designed to foster a positive workplace culture, reinforce team spirit, and support employee wellbeing. By investing in meaningful engagement experiences, Lulu Retail continues to nurture a workplace where employees feel connected, supported, and inspired to contribute to our shared success.

CASE STUDY

STRENGTHENING EMPLOYEE ENGAGEMENT AT LULU RETAIL

Employee engagement is central to building a positive workplace culture and supporting employee well-being. In 2025, Lulu Retail introduced new initiatives to strengthen team spirit and encourage healthier lifestyles across the organisation.



Step Up Challenge

The Step Up Challenge was launched to promote physical wellness and motivate employees to adopt more active daily routines. Employees were invited to walk at least 10,000 steps per day for 10 consecutive days, supported by a dedicated group on the STEP UP application to track progress and encourage participation. The challenge saw strong engagement, with 90+ Headquarters employees taking part. Four employees achieved the highest step counts and were recognised through certificates and rewards, reinforcing a culture of motivation and shared achievement.



Coca-Cola Personalised Can Experience

To create a fun, personalised moment that strengthens workplace connections, Lulu Retail partnered with Coca-Cola to deliver a unique engagement activity. The Operations and HR teams coordinated the distribution of personalised Coca-Cola cans featuring employees' names, creating a memorable experience that generated enthusiasm and strengthened team bonding.

IMPACT

Together, these initiatives demonstrate Lulu Retail's commitment to employee engagement by combining wellness-driven activities with creative experiences that enhance morale. They helped foster a more connected workplace, encouraged healthier habits, and reinforced a culture of positivity and inclusion.

RECRUITMENT AND BENEFITS

Our recruitment strategy prioritises attracting junior and mid-level talent and offering clear pathways for career advancement. By supporting the progression of capable employees into higher roles, we help cultivate a strong internal talent pipeline. We provide competitive compensation and benefits across all markets, supported by regular and comprehensive salary reviews. In addition, all employees receive paid leave in accordance with local government regulations, ensuring fairness and compliance in every region where we operate.

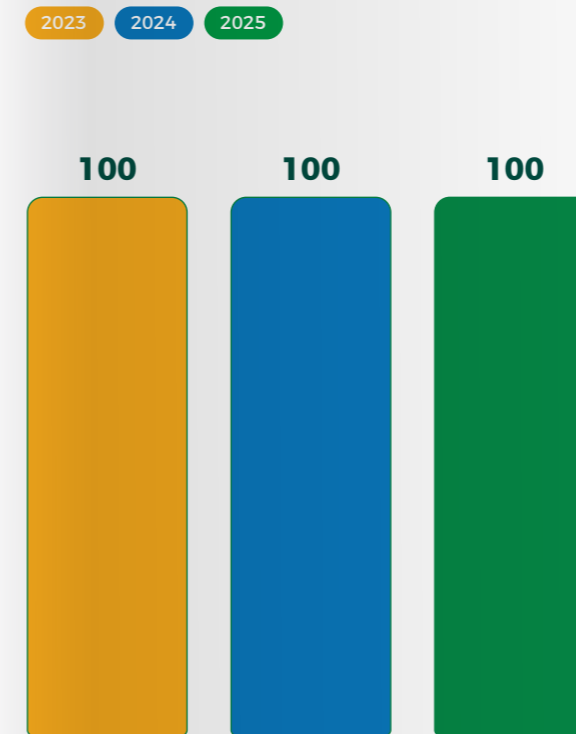
PARENTAL LEAVE

All Lulu Retail employees are entitled to parental benefits in accordance with the labour laws of the countries in which we operate. Throughout the year, a significant proportion of employees who took parental leave successfully returned to work, reflecting our supportive policies and commitment to enabling a smooth transition during this important period.

INDICATOR	UNIT	2023	2024	2025
Total number of female employees entitled to maternity leave	#	116	109	189
Total number of female employees who took maternity leave	#	116	109	189
Total number of female employees who returned to work in the reporting period after maternity leave ended	#	116	109	156

Retention rate

(total number of employees retained 12 month after returning to work following a period of parental leave / total number of employees returning from parental leave)

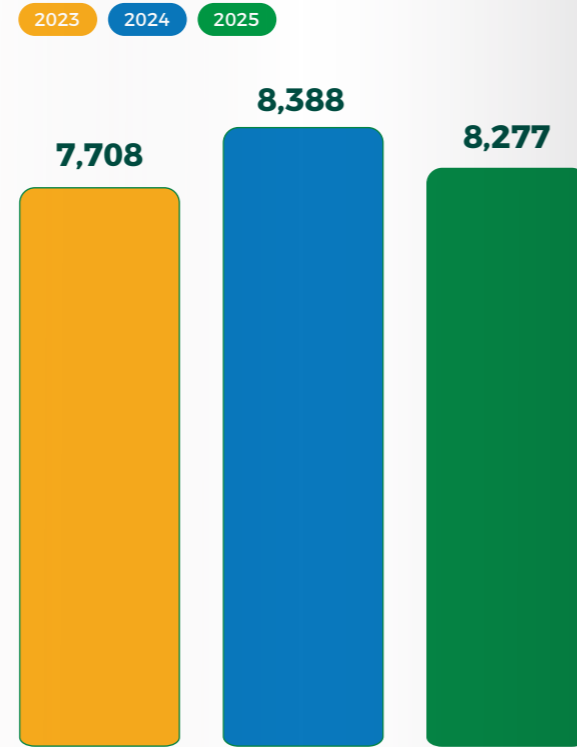


NATIONALISATION

Lulu Retail has implemented a range of initiatives aimed at strengthening the recruitment and retention of national talent, with a particular focus on young nationals. These efforts include active participation in government-led national recruitment programmes across the GCC—such as Nafis in the UAE and Tawteen in Oman—as well as conducting regular walk-in interviews to attract and engage local candidates. These programmes are tailored to reflect local cultural and organisational contexts and address key areas such as competitive compensation, career development, work-life balance, cultural inclusion, clear communication, community engagement, and succession planning. Together, these efforts support long-term growth and help build a strong national talent pipeline across our markets.

In 2025, LuLu Retail employed 8,277 national employees across its operations. This reflects the continued scale of the Group’s national workforce and its sustained focus on workforce localisation across key markets, supporting national employment objectives and long-term talent development.

Number of national employees



Fostering Workplace Diversity and Equity

Lulu Retail is committed to fostering an inclusive work culture where diversity is valued and every individual is treated with dignity, fairness, and respect. Across our global operations, we prioritise equal opportunity, representation, and non-discrimination, ensuring that our workforce reflects the markets and communities we serve. Our policies and practices are designed to build a workplace where people from all backgrounds feel welcome, supported, and empowered to succeed.

This commitment is upheld across all regions, though implemented in ways that reflect each country’s regulatory context and labour market. In Saudi Arabia, diversity and inclusion are strengthened through compliance with Saudisation requirements and targeted programmes that create opportunities for women and people of determination, while multinational hiring ensures strong cultural representation. Bahrain reinforces inclusion by encouraging the recruitment of women and differently abled persons, applying gender-neutral hiring practices, and nurturing a multicultural workforce.

In Oman, diversity efforts are anchored in national labour requirements, with Lulu Retail recognised as one of the country’s largest employers of nationals. Our nationalisation approach guides recruitment in partnership with government platforms such as “Tawteen,” while management teams are trained to support women and people of determination in safe and inclusive work environments. Canada supports diversity through a workforce reflective of local demographics and full adherence to national labour and equality standards.

Qatar advances equity through clear legal commitments to employing nationals and through structured initiatives supporting the hiring of women and people of determination. Comprehensive HR frameworks—including non-discrimination practices, anti-harassment provisions, grievance mechanisms, and awareness training ensure a safe, respectful, and inclusive workplace supported by strong regulatory oversight.

In Europe, inclusion is embedded in long-standing legal frameworks. Italy operates under European Union (EU) directives and national legislation that guarantee equal treatment and prohibit discrimination across gender, nationality, religion, ethnicity, disability, and age. This ensures that all vacancies remain open to all qualified candidates based strictly on merit. Spain similarly adheres to EU and national equality mandates that prohibit discrimination and forced labour. In Spain, hiring practices remain fully aligned with legal standards that mandate fair and equitable employment.



The UAE reinforces diversity through equal opportunity hiring, multicultural staffing, and adherence to federal anti-discrimination regulations. Workforce diversity is naturally high due to the multinational labour market, and employees benefit equally from HR policies, performance systems, and access to training. Mandatory induction across UAE operations includes modules on the human rights, Code of Ethics, and anti-discrimination commitments. Lulu Retail in USA reinforces fairness and

inclusion through compliance with local regulations, ensuring a safe and legally compliant work environment.

Across all regions, non-discrimination is supported by clear reporting channels, trained management teams, and disciplinary action where necessary. These collective efforts help ensure that all employees feel respected, valued, and included, strengthening our culture and supporting a workplace where everyone can thrive.



INDICATOR	UNIT	2023	2024	2025
Total Employees in Senior Management	#	14	14	14
Total Employees in Middle Management	#	612	637	665
Female	#	18	17	22
Male	#	594	620	643
Total Employees in Staff	#	50,552	52,967	51,758
Female	#	8,542	9,497	9,676
Male	#	42,010	43,470	42,082



FEMALE EMPOWERMENT

As part of our broader diversity commitment, Lulu Retail continues to support the growth and advancement of women across the organisation. We provide guidance, mentorship, and career development opportunities that enable female employees to progress confidently in their professional journeys. By recognising and valuing diverse perspectives, we strive to create an environment where women feel respected, empowered, and heard.

Our ongoing initiatives have contributed to a continued increase in female representation from 2024 to 2025, with women comprising 18.5% of our total workforce. Our gender-neutral practices support women at every stage of their careers, offering opportunities for personal and professional development and encouraging them to take on leadership roles within the business. Our mentorship programmes offer equal opportunities for all employees, pairing them with experienced mentors to foster career development and progression.



BUILDING A SAFE AND RESPECTFUL WORKPLACE

Lulu Retail is committed to nurturing a workplace where every person feels protected, respected, and able to speak up. Central to this commitment is our firm stance against any form of discrimination. From the moment employees join the organisation, they are introduced to our expectations around respectful conduct and ethical behaviour, supported by a clear Code of Conduct that guides how we interact with one another.

To further safeguard our people, Lulu Retail has systems in place to deter and detect inappropriate behaviour across our workplaces. This includes security camera systems in most operational areas, helping ensure that our stores and facilities remain safe and respectful environments for all.

We want employees to feel safe raising concerns, and we make that possible through a culture that rejects retaliation of any kind. Whether an employee chooses to speak to a manager, contact HR, or use one of the other reporting channels available, they can be confident that their concerns will be handled discreetly and professionally. Information is shared only with those responsible for resolving the issue, reinforcing our belief in fairness, accountability, and trust.



NO DISCRIMINATION INCIDENTS WERE REPORTED IN 2025, HIGHLIGHTING THE EFFECTIVENESS OF OUR POLICIES AND OUR COMMITMENT TO DIGNITY AND INCLUSION.

Developing Talent and Capability

Developing the skills and capabilities of our people is essential to Lulu Retail's long-term success. We remain committed to investing in continuous learning, leadership development, and structured training pathways that enable employees to build meaningful careers within the organisation.

As our global footprint expands, we continue to harmonise training systems and ensure that employees across all regions have access to high-quality learning opportunities that support their growth.

At the Group level, learning and development are driven by structured induction programmes, job-specific and

technical modules, behavioural and leadership training, and compliance learning delivered through offline and digital platforms. These tools provide a consistent foundation while allowing each region to tailor training to its operational needs and regulatory environments.



Lulu Retail offers a comprehensive suite of standard training programmes designed to build skills, enhance performance, and foster professional growth across different levels of the organisation. Our internal training programmes ensure employees are equipped to deliver excellence in a dynamic retail environment.

Induction Training



This comprehensive programme marks the beginning of every employee's journey at Lulu Retail. It familiarises new hires with our values, culture, and onboarding procedures, ensuring smooth integration into a dynamic work environment.

Retail Training (Basic, Intermediate, Advanced)



A multi-tiered programme designed to equip employees with progressively advanced strategies for customer engagement and store management. From foundational retail principles to advanced managerial techniques, this training covers the full spectrum of retail operations.

Health and Beauty Training



Tailored for employees in health and beauty departments, this training focuses on product knowledge and customer interaction, enabling exceptional service and guidance on beauty and wellness products.

Frozen Food Training



Emphasises safe handling and storage of frozen products, ensuring compliance with food safety protocols and maintaining product quality.

Customer Service Training



Customer satisfaction is paramount. This programme hones communication and conflict resolution skills, empowering employees to deliver exceptional service.

Housekeeping Supervisors Training



Designed for supervisory roles, this training imparts advanced housekeeping practices and leadership skills to maintain the highest standards of cleanliness and organisation.

Point-of-Sale (POS) Training



Provides in-depth knowledge of POS systems and cash handling procedures, ensuring seamless and accurate transactions.

Basic Food Hygiene



Covers essential food safety and hygiene practices to uphold product integrity and compliance with health standards.

Cashiers Training



Focuses on cash handling techniques and customer service skills for efficient and positive checkout experiences.

Supervisors Training



Develops leadership and management capabilities, enabling supervisors to coordinate teams effectively and drive operational excellence.

Packers Training



Teaches best practices in packing and handling to ensure precision and efficiency in operations.

Assistant Managers Training



Prepares future leaders through specialised training in decision-making and strategic responsibilities.

Effective Communication Skills Training



Enhances verbal and written communication skills for confident and clear interactions.

Basic Selling Skills Training



Equips employees with fundamental selling techniques and product knowledge to promote offerings effectively.

Storekeepers Training



Focuses on inventory management and stock control for operational accuracy.



Butchery Training

Covers meat cutting, preparation, and hygiene standards to deliver high-quality products.



Seafood Training

Teaches proper handling and preparation of seafood to ensure freshness and quality.



Fruits and Vegetables Training

Covers handling, storage, and presentation of fresh produce to maintain appeal and quality.



Delicatessen Training

Prepares employees for deli product preparation and service, ensuring a delightful customer experience.



Roastery Training

Provides expertise in coffee roasting techniques and comprehensive product knowledge.



BLSH and Perfume Training

Offers in-depth insights into beauty and fragrance products to guide customers effectively.



Bakery Training

Covers baking techniques, pastry production, and the art of creating high-quality baked goods.



Hot Food Training

Focuses on preparing hot, ready-to-eat foods that meet freshness and taste standards.



Trainers Training

A train-the-trainer programme that equips internal trainers with skills to deliver engaging and effective sessions.



Security Training

Educates employees on security protocols and emergency response strategies to ensure safety.



External Training (Department Store)

Collaborates with external providers for specialised training relevant to department store operations.



Buyers Training

Covers procurement strategies, vendor management, and product sourcing techniques.



Communication Skills Training for Managerial Level

Develops advanced communication skills for managers to lead effectively.



Leadership Training Programme

Nurtures leadership qualities, empowering employees to lead teams and contribute to organisational growth.



On-the-Job (OJT) Training

Provides practical, hands-on experience within specific roles for real-world skill application.



Our employees undergo mandatory health and safety training to familiarise themselves with emergency protocols, accident prevention measures, and proper procedures to ensure a safe working environment. To further strengthen access to learning, Lulu Retail operates an advanced LMS, providing a centralised, digital gateway for training courses, learning resources, and development programmes. Accessible across personal devices through a modern, user-friendly interface, the LMS enables a seamless and personalised learning journey by catering to individual roles, skills,

and career development needs. The platform supports e-learning courses, documents, videos, surveys, and assignments through online, offline, and hybrid formats. Interactive content such as videos, quizzes, and learning modules enhances engagement, while real-time progress tracking enables continuous monitoring of learning outcomes. Mobile functionality ensures that employees can access learning anytime, anywhere, and the option to download content for offline use further strengthens accessibility across diverse operational environments.



TRAINING ACROSS GLOBAL OPERATIONS

Lulu Retail's commitment to workforce development spans all regions, fostering a robust and standardised learning ecosystem. Across the GCC, regional operations have adapted these training initiatives into structured development frameworks tailored to local requirements. For instance, Health, Safety, and Environment (HSE) training in Abu Dhabi, UAE, is aligned with ADOSH SF standards and ISO 45001 guidelines.

In Europe, employee development is driven by legislative requirements. In Italy, mandatory training programmes are conducted along with vocational trainings such as forklift operation and customs-procedure training. Spain implements structured training plans that address both company standards and local regulatory requirements. Similarly, in the United Kingdom and the

United States, training programmes adopt a compliance-driven approach aligned with regional regulations and operational needs.

Across all operations, training effectiveness is reinforced through structured evaluations, including assessments, supervisor observations, feedback forms, and performance reviews. Regular OJT reviews, integration of feedback into annual training plans, and the expansion of digital learning platforms ensure that programmes remain practical, relevant, and responsive to organisational needs.

TRAINING AND DEVELOPMENT OVERSIGHT

Lulu Retail views learning as a living system, one that grows, adapts, and improves alongside our people. Our training programmes are designed to not only meet industry expectations but to set a high benchmark for quality across all markets. In Oman, this commitment is reflected in our ISO 21001 certification, and we continue exploring similar certifications across other regions to reinforce the strength and credibility of our learning standards.

To ensure programmes remain meaningful and effective, we conduct continuous reviews supported by employee feedback, learning assessments, and follow-up evaluations. Insights from these evaluations help refine content, enhance delivery methods, and ensure employees feel supported in their development.

We also rely on structured data analysis—including training attendance, learning hours, programme participation, and competency gaps. These insights guide resource allocation and strengthen transparency in reporting for internal and external stakeholders. Through this disciplined, feedback-driven approach, Lulu Retail ensures that every training programme is purposeful, aligned with organisational goals, and contributes to a capable, future-ready workforce.

Across Lulu Retail, a total of 1,206,051 training hours were delivered, with average training hours per employee reaching 23 hours, reflecting Lulu Retail’s sustained commitment to continuous development, skills enhancement, and organisational capacity building.



Embedding a Culture of Safety

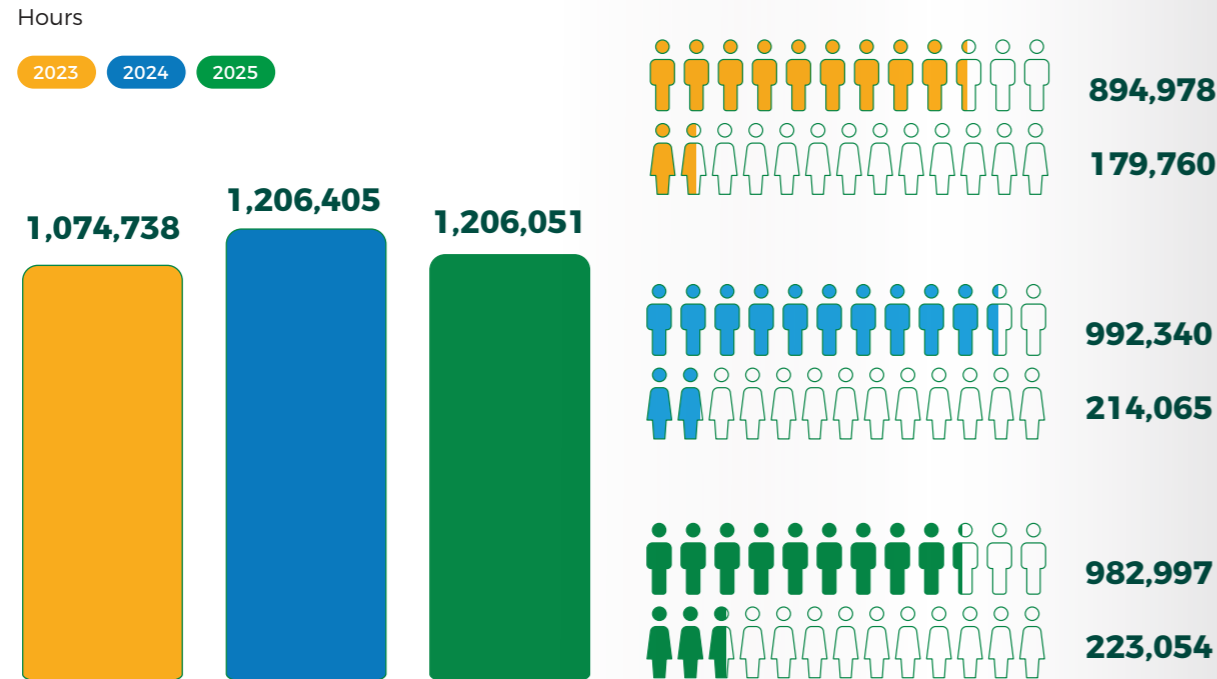
A strong safety culture is foundational to our operations. Lulu Retail is committed to protecting the wellbeing of employees by maintaining safe working environments, promoting responsible practices, and ensuring full compliance with regulatory standards. We strengthen our safety systems through clear guidelines, regular training, incident-prevention measures, and operational oversight that reinforces safe behaviours in every workplace. Our hazard-management system, including workplace inspections, Personal Protective Equipment (PPE) protocols, hazard reporting, and emergency-response preparedness, continues to guide performance globally.

At the Group level, safety expectations are integrated into induction programmes and refreshed through periodic learning modules, ensuring all employees begin their roles with a clear understanding of workplace

safety requirements. This global foundation provides consistency while allowing each region to tailor practices to local laws and operational needs.



Total number of training hours by gender



INDICATOR	UNIT	2023	2024	2025
Average hours of training per employee by gender				
Average	Hours per number of total employees	21	22.5	23
Female	Hours per number of total employees	21	22.5	23
Male	Hours per number of total employees	21	22.5	23

REGIONAL SAFETY PRACTICES

Across our regions, safety practices reflect operational scale and regulatory environments. Some of the key best-practice examples are outlined below:



KSA

Saudi Arabia delivers extensive safety training covering fire safety, emergency preparedness, general Occupational Health and Safety (OHS) awareness, and specialised hygiene and food-safety instruction—particularly for large-scale operations such as commissary sites.

CANADA

Canada reinforces safety through hands-on supervision, where managers coach staff on proper equipment handling, hazard recognition, and safe work practices.

UAE

United Arab Emirates follows strong safety frameworks, including ADOSH SF 4.0 in Abu Dhabi, and ISO 45001 across many Dubai and Northern Emirates locations. Training covers OHS awareness, fire safety, emergency evacuation, hazard and risk identification, manual handling, knife safety, food safety, and toolbox talks. These programmes are supported by routine floor walks, HSE officer supervision, and continuous risk-management processes. Minor injuries—mainly cuts and slips—were promptly addressed, reported to authorities, and followed by corrective actions. Several UAE locations operate dedicated Safety Committees that regularly review risks, monitor corrective actions, and strengthen governance.

BAHRAIN

Bahrain upholds strong safety discipline through fire-safety programmes, evacuation drills, HSE induction, and HACCP-aligned food-safety training.

OMAN

Oman operates a comprehensive HSE framework supported by daily checklists, routine walk-ins, and oversight from dedicated safety officers. Employees complete safety training every six months through dedicated external providers, reinforced by regular refreshers delivered by on-site HSE teams.

QATAR

Qatar embeds safety through comprehensive trainings, including emergency preparedness, hazard identification, contamination control, PPE use, temperature control, cleaning and disinfection, and waste management—ensuring safe product handling in both retail and warehousing environments.

KUWAIT

Kuwait ensures workplace safety through ISO 45001-certified Occupational Health and Safety systems, supported by comprehensive training programmes covering induction, food safety, HSE, and emergency preparedness. Regular toolbox talks, internal audits, and risk assessments reinforce a proactive safety culture and continuous compliance.

UK

United Kingdom supports safety through induction in manual handling and fire safety, followed by technical modules covering warehouse machinery, forklift and pump-truck operation. Safety walks, hazard reporting, and corrective action reviews help prevent incidents such as pallet-related trips. Fire Marshals and First Aiders receive advanced training, and UK sites maintain Safety Committees aligned with best practices in health and safety.

USA

United States maintains a comprehensive Occupational Safety and Health Administration (OSHA)-aligned safety programme covering workplace safety, chemical and ergonomic hazards, warehouse and equipment risks, emergency response, incident reporting, and hazard identification. Employees may confidentially report hazards or remove themselves from unsafe conditions without reprisal, in line with OSHA protections. Slips, trips, and falls remain the most common hazards and are mitigated through root-cause analysis, regular inspections, employee engagement and corrective-action processes.

EU

In Europe, operations adhere to robust regulatory frameworks, delivering mandatory training in occupational safety, HACCP food hygiene, and fire prevention, complemented by vocational trainings such as equipment handling.

Across all regions, these integrated efforts reinforce safe behaviours, reduce workplace risks, and uphold our commitment to a secure and responsible working environment for every employee.

OHS GOVERNANCE AND SYSTEM OVERSIGHT

Our OHS system defines the safety standards expected across all operations. It is designed to provide universal coverage for all employees, including access to essential healthcare services and necessary medications. Each region aligns its OHS system with national standards and regulatory requirements, ensuring full legal compliance.

We frequently review OHS performance and implement new risk-management strategies as required. Regular inspections, safety audits, and incident reviews help maintain strong control measures and reinforce a proactive approach to hazard prevention.

TRAINING, COMMUNICATION, AND AWARENESS

Through structured training and open communication, we ensure employees understand the risks relevant to their roles and the precautions necessary to mitigate them. Employees are encouraged to stay vigilant, report hazards, and take immediate action when unsafe conditions arise.

Safety committees in the UAE, Kuwait, US, and UK meet regularly to assess incidents, discuss system enhancements, and ensure control measures are maintained. These platforms strengthen accountability and encourage continuous improvement across all operations.

Across all regions, our integrated OHS approach reinforces safe behaviours, reduces workplace risks, and upholds our commitment to a secure working environment. Minor incidents—primarily cuts and slips—were promptly addressed, documented, and followed by corrective actions to prevent recurrence. No fatalities were recorded across any region during 2025, reflecting the strength of our systems and our ongoing investment in safety excellence.

TOTAL
336
INJURIES WERE RECORDED DURING 2025.



Ensuring Product Quality and Customer Trust

Delivering safe, high-quality products is central to maintaining customer trust. Across our markets, Lulu Retail adheres to stringent product handling, hygiene, and quality assurance practices that reflect both regulatory requirements and our internal standards. Our teams are trained to uphold consistency and care at every step of the product journey.

FOOD SAFETY

As one of the region's leading retailers, Lulu Retail is committed to ensuring that every product on our shelves reflects the highest standards of health, safety, and quality. Our responsibility begins long before items reach our stores through a rigorous compliance system that aligns with the requirements of regulatory authorities across all countries where we operate.

To uphold consistent excellence, we maintain clear procedures that ensure adherence to all legal and regulatory obligations. Our outlets in the GCC locations are certified to ISO 22000 (Food Safety Management System) and HACCP standards to ensure the highest levels of food safety, hygiene, and compliance with international best practices. Our Private Label Department further strengthens this assurance with ISO 9001:2015 certification, operating a robust quality framework that governs supplier selection, certification checks, testing protocols, and compliance with Gulf Standardisation Organization (GSO) standards. These measures help enhance the nutritional value of our offerings, while transparent labelling empowers customers to make informed and healthier choices.

Food safety is reinforced through mandatory training delivered across the organisation as part of our ISO 22000 and HACCP compliance. These programmes ensure employees remain current with international regulations, evolving safety requirements, and industry best practice. Our dedicated teams oversee all aspects of product safety, from routine testing and impact assessments to customer feedback analysis.

On the rare occasion that a non-compliance issue is identified, it is addressed with urgency and thorough investigation. Root cause analysis, corrective actions, and transparent communication reflect our commitment to accountability and trust.

Training remains central to our approach. Regular food safety sessions across the organisation help maintain a high level of awareness and capability among employees, ensuring that product handling, preparation, and storage meet the stringent standards we uphold.





LULU RETAIL PRIVATE LABEL PRODUCTS

Our Private Label Department plays a key role in shaping products that reflect our brand promise and the evolving tastes of our customers. Created exclusively for Lulu Retail, these products are designed with careful attention to quality, value, and lifestyle preferences.

The department continues to make strong progress in expanding and enhancing our private label offering. Our product lines also include organic, sugar-free, and gluten-free options, complemented by a diverse selection of eco-friendly items. These advancements have been achieved while navigating a dynamic global operating environment. By diversifying our supplier base, strengthening inventory management systems, and maintaining close communication with vendors, we have reinforced our resilience and ensured consistent product availability without compromising on quality.

Transparency sits at the heart of our private label philosophy. Clear labelling helps customers make confident choices, whether they are seeking allergen information, or non- Genetically Modified Organism (GMO) assurance. This also extends to disposal guidance that supports more responsible consumption.

Our product health and safety benchmarks are set against industry best practice, GSO regulations, and our own internal standards. To support this, employees receive training on the nutritional benefits of private label items, how to interpret labels, and the basic nutritional principles. This equips them to confidently guide customers, communicate product benefits, and stay informed about emerging health trends and upcoming product innovations.

INDICATOR	UNIT	2023	2024	2025
Own brand products sold with less sugar/salt/saturated fatty acids/free from additives offered	#	583	783	943
Own brand organic products offered	#	334	389	400

STRENGTHENING CUSTOMER RELATIONSHIPS

Lulu Retail is committed to delivering a seamless and positive experience for every customer. Our approach combines clear communication, personalised service, and responsive support to build trust and long-term loyalty.

Customer feedback may be received through various channels, such as feedback forms, email, and call centres, with a dedicated team responsible for reviewing and addressing each case. Insights from these interactions guide ongoing refinements to our service quality and store operations. Regular surveys enable us to collect customer feedback and identify improvement opportunities.

CASE STUDY

CUSTOMER ENGAGEMENT: DRIVING SUSTAINABILITY AND ACTIVE LIFESTYLES

Walk to Mars Challenge

As the Official Retail and Lifestyle Partner of the Open Masters Games Abu Dhabi 2026, Lulu Retail launched the "Walk to Mars" challenge at Al Wahda Mall, inviting customers to contribute steps toward a national goal of 54 million kilometres. This initiative promotes active lifestyle and builds excitement for the Games featuring over 30 sports, including disciplines for People of Determination.

Reverse Vending Machines

Customers can deposit used plastic bottles and cans in reverse vending machines installed at Lulu Retail stores and receive rewards in return. This initiative promotes recycling and incentivizes sustainable behaviour among shoppers.

E-Waste Collection for Circularity

Lulu Retail has placed e-waste bins in select stores, enabling customers to responsibly dispose of used electronic items. This initiative supports the UAE's national circularity agenda and encourages responsible consumption as part of Lulu Retail's broader sustainability commitment.

Eco-Friendly Product Zones

Dedicated sections in select stores showcase eco-friendly products, helping customers make sustainable choices with ease. QR codes provide information on resource efficiency and sustainable living, fostering awareness and engagement.



Lulu Retail will continue enhancing customer engagement through timely communication and data-driven decision-making to meet evolving expectations across all markets.

Contributing to Community Progress

Lulu Retail is committed to contributing to the social and economic wellbeing of the communities in which we operate. Through meaningful engagement, local partnerships, and targeted support for social and environmental initiatives, we strive to create value beyond our business. Our approach reflects our responsibility to uplift people, strengthen community connections, and support inclusive development across all our markets.



Throughout 2025, the UAE demonstrated strong community engagement through a wide range of CSR programmes. Health and well-being were prioritised through blood donation drives, Ramadan donations and walkathon. Environmental stewardship was reinforced with cleanup campaigns, can collection drive, and Global Recycling Day activities, promoting eco-friendly practices and creative reuse of materials. Awareness campaigns on World Water Day and Earth Hour highlighted resource conservation and energy efficiency. Social inclusion was celebrated through events such as Orphans Day, International Women's Day, Emirati Women's Day, and International Day of Families, alongside initiatives honouring nurses and teachers. Additional programmes, including Environment Day, International Children's Day,

and cultural activities, strengthened community bonds while promoting sustainability and responsible practices.

Complementing these efforts, health initiatives included free medical checkups and breast cancer awareness campaigns offering screenings and consultations. Educational empowerment was advanced through life skills and financial literacy sessions for students of determination, practical shopping exercises for special needs students, and experiential learning through school field trips. Community development was supported by charity drives collecting food, clothes, and donations for underprivileged groups.





KSA



Lulu Retail Saudi Arabia undertook a diverse range of CSR initiatives in 2025, reflecting its commitment to community welfare, health, and sustainability. In partnership with the Saudi Food Bank Association, Lulu Retail contributed SAR 320,770 to food security programmes aimed at reducing food waste and supporting vulnerable families. Through the Adahi Programme with Al-Bir Charity, Lulu Retail facilitated contributions from 1,266 donors, benefiting 1,528 individuals. The company also maintained its ongoing collaboration with Zahra Association, donating SAR 102,294 from reusable bag proceeds to fund breast cancer awareness initiatives.

Lulu Retail advanced inclusivity by celebrating Purple Saturday with a 20% discount for People of Determination. Health and wellness were promoted through the Lulu Retail Walkathon, engaging over 15,000 participants in a community fitness event. A unique social media initiative with the Association for People with Disabilities pledged full medical treatment for a beneficiary upon reaching a retweet milestone. During Hajj 2025, Lulu Retail partnered with Kidana Development Company under the Royal Commission for Makkah to operate retail outlets at holy sites, ensuring exceptional service for pilgrims. Additionally, Lulu Retail gifted Khobar Corniche a Guinness World Record-winning shattered glass artwork by Saudi artist Aseel Al-Mughlouth, symbolizing national pride and cultural heritage.

Qatar demonstrates a strong commitment to community engagement through impactful partnerships and initiatives. Collaborating with leading organisations such as Qatar Charity, Qatar Red Crescent, and Qatar Cancer Society, Lulu Retail supports vulnerable communities and promotes inclusion. The renewed humanitarian partnership with Qatar Charity through the 'Shop & Donate' campaign channels proceeds from over 1,200 products to its "Giving Lives On" initiatives, reinforcing Lulu Retail's role in long-term philanthropic efforts. In addition, Lulu Retail donated QR 150,000 directly to Qatar Charity, contributed QR 125,000 to Qatar Cancer Society, organised Iftar meal distributions with Qatar Red Crescent during Ramadan, and marked World Autism Awareness Day by illuminating its D-Ring Road branch in vibrant blue to foster understanding and acceptance.

Beyond philanthropy, Lulu Retail champions sustainability and social responsibility through campaigns like 'World Earth Day,' encouraging reusable bag adoption, and active participation in public awareness programmes. These efforts earned Lulu Retail Qatar the **"Best CSR Initiative in the Retail Sector" award at the Qatar CSR Summit 2025.**



QATAR



OMAN



Lulu Retail Oman actively partners with organisations such as the Cancer Association and local charities to drive health awareness, social welfare, and support for vulnerable groups. A flagship initiative, the Ramadan Food Security Programme - 'Lulu Convoy of Goodness,' delivered grocery boxes to over 1,000 families across Oman, from Dhofar to Musandam, earning recognition as the **'Best CSR Campaign' at the Oman Marketing Impact Awards 2025.** These efforts reflect Lulu Retail's commitment to addressing food security and fostering community well-being.



Lulu Retail invests in Education and Youth Development through programmes like Back-to-School, which engaged thousands of children in free workshops on healthy eating, recycling, and life skills, nurturing creativity and community spirit. The company also champions Small and Medium-sized Enterprise (SME) and local business development by helping farmers and small enterprises improve, standardise, and market their products, driving sustainable growth and supporting Oman's economy.



BAHRAIN



Lulu Retail drives impactful community initiatives across Bahrain. The Charity Football Event at the National Stadium, under the patronage of H.H. Shaikh Nasser, raised funds for People of Determination and orphaned children. On Labor Day, Lulu Retail partnered with Epix Cinema to distribute food boxes and host a special screening for labourers. During Ramadan, the Faid Al Atta - Joy of Giving campaign delivered food boxes and snacks, while Diwali sweet boxes were shared with workers and delivery drivers. In collaboration with SMILE, Lulu Retail set up kiosks across outlets to sell merchandise, with proceeds supporting cancer treatment for children.



KUWAIT



Kuwait drives impactful community initiatives focused on health, wellness, and sustainability. Highlights include Diabetes Day and Breast Cancer Awareness campaigns with free screenings and expert talks, a comprehensive medical camp for employees, and International Yoga Day sessions promoting holistic well-being. Environmental responsibility was reinforced during World Environment Day through eco-friendly product displays and the launch of a "Go Paperless" e-receipt programme. Lulu Retail also honoured healthcare professionals on Nurses Day with special offers, reflecting gratitude for their service.



Collectively, these initiatives reflect Lulu Retail's unwavering commitment to creating meaningful social impact across the GCC. By addressing food security, health awareness, education, inclusivity, sustainability, and cultural enrichment, Lulu Retail continues to strengthen its role as a responsible corporate citizen. Through strategic partnerships and community-driven programmes, the company not only uplifts vulnerable groups but also fosters long-term economic and social development, reinforcing its vision of building stronger, more inclusive communities.

In 2025, LuLu Retail allocated approximately USD 1.1 million toward donations and sponsorships, representing an increase of around 18% compared to 2024. These contributions supported community initiatives across key operating markets, focusing on priority social areas aligned with the Group’s community-investment approach and reinforcing its commitment to social development and community well-being.

Donations and Sponsorships

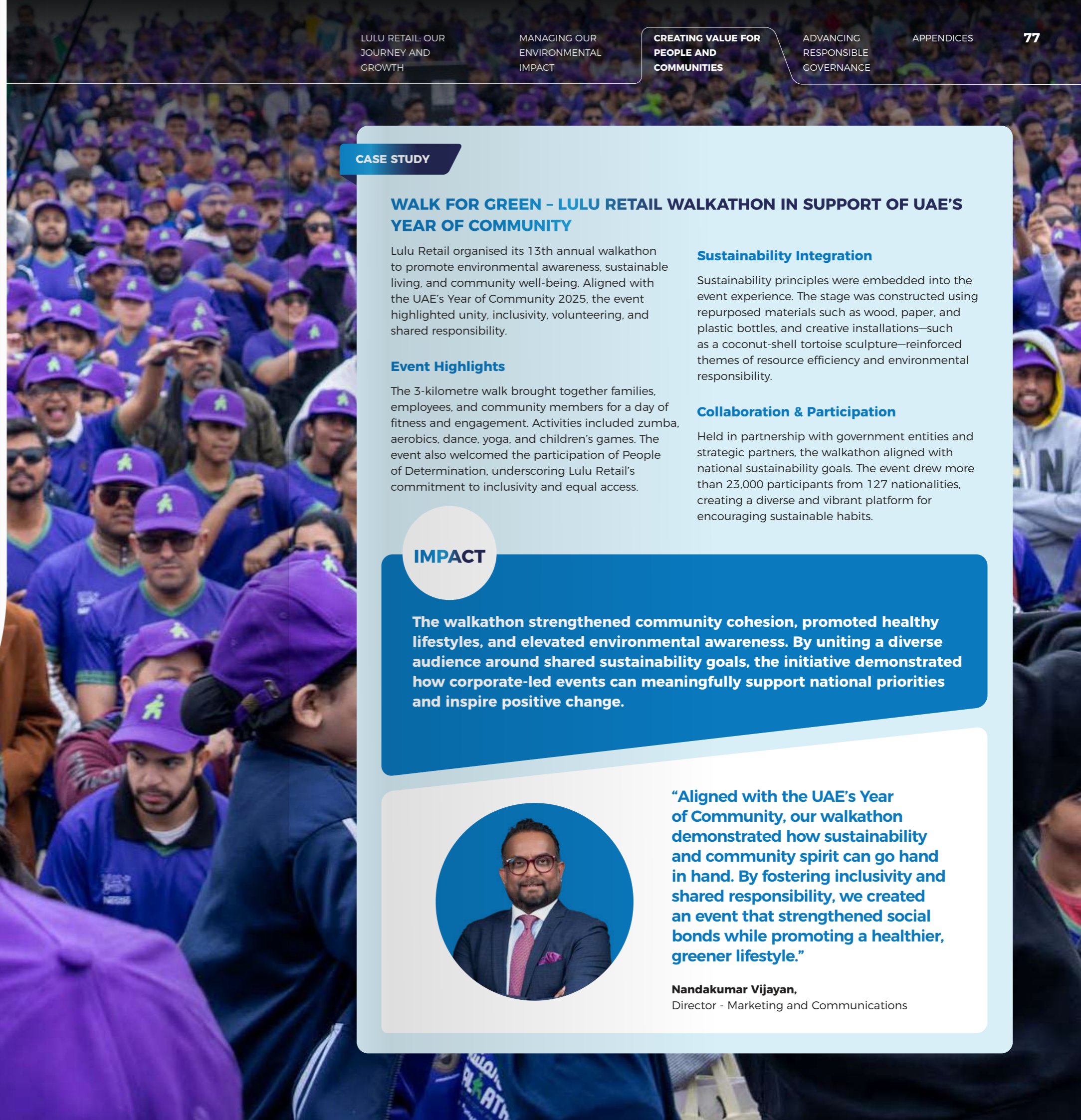
USD (Rounded)

2023 2024 2025

2,269,756

961,936

1,138,679



CASE STUDY

WALK FOR GREEN - LULU RETAIL WALKATHON IN SUPPORT OF UAE’S YEAR OF COMMUNITY

Lulu Retail organised its 13th annual walkathon to promote environmental awareness, sustainable living, and community well-being. Aligned with the UAE’s Year of Community 2025, the event highlighted unity, inclusivity, volunteering, and shared responsibility.

Sustainability Integration

Sustainability principles were embedded into the event experience. The stage was constructed using repurposed materials such as wood, paper, and plastic bottles, and creative installations—such as a coconut-shell tortoise sculpture—reinforced themes of resource efficiency and environmental responsibility.

Event Highlights

The 3-kilometre walk brought together families, employees, and community members for a day of fitness and engagement. Activities included zumba, aerobics, dance, yoga, and children’s games. The event also welcomed the participation of People of Determination, underscoring Lulu Retail’s commitment to inclusivity and equal access.

Collaboration & Participation

Held in partnership with government entities and strategic partners, the walkathon aligned with national sustainability goals. The event drew more than 23,000 participants from 127 nationalities, creating a diverse and vibrant platform for encouraging sustainable habits.

IMPACT

The walkathon strengthened community cohesion, promoted healthy lifestyles, and elevated environmental awareness. By uniting a diverse audience around shared sustainability goals, the initiative demonstrated how corporate-led events can meaningfully support national priorities and inspire positive change.



“Aligned with the UAE’s Year of Community, our walkathon demonstrated how sustainability and community spirit can go hand in hand. By fostering inclusivity and shared responsibility, we created an event that strengthened social bonds while promoting a healthier, greener lifestyle.”

Nandakumar Vijayan,
Director - Marketing and Communications



Advancing Responsible Governance

The success of Lulu Retail is founded upon good governance and effective leadership. Robust policies and procedures embed responsible business practices and ethical conduct throughout all areas of our organisation. This ensures we operate with transparency, integrity, and trust, promoting the welfare and interests of all our stakeholders.

HIGHLIGHTS

Zero

cases of bribery, corruption, or conflicts of interest reported in 2025



Zero

incidents of data breaches, data loss, or cyber-attacks recorded in 2025



157,311

hours of human rights training delivered across the workforce



Established Sustainability, Strategy and Investment Committee to oversee ESG priorities and long-term value creation



82.7%

of total procurement spend sourced from local suppliers (~4% increase compared to 2024)



MATERIAL TOPICS

- Business Ethics
- Human Rights
- Procurement
- Data Privacy & Security

UN SDGS

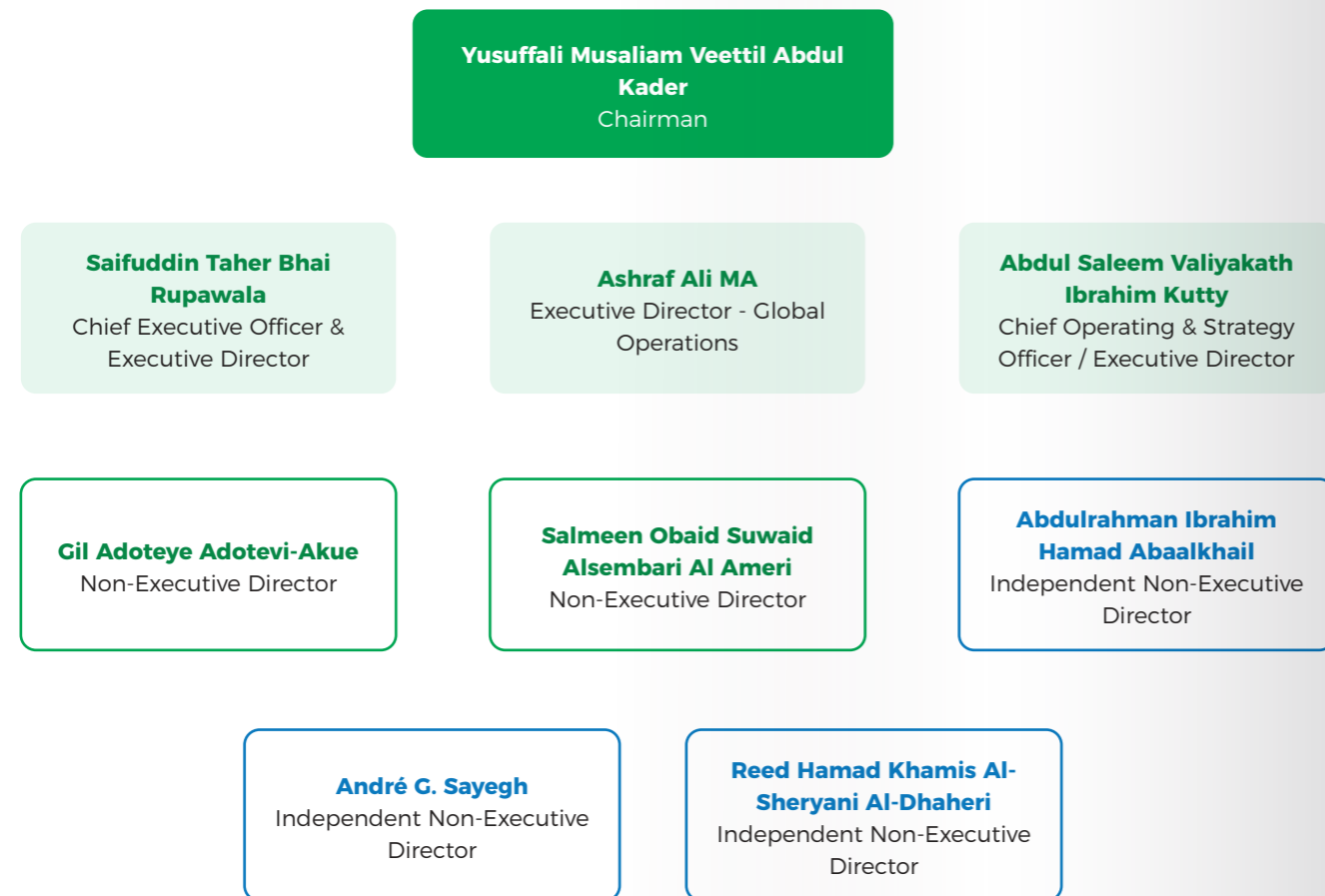


Strengthening Governance and Oversight

Lulu Retail maintains a robust governance framework that underpins effective risk management and regulatory compliance across all operations. Our governance practices consistently meet, and in many cases exceed, legal and regulatory requirements, ensuring we operate responsibly, uphold stakeholder trust, and sustain our position as a leading global retail brand.

BOARD OF DIRECTORS

The Board of Directors ("the Board") serves as Lulu Retail's highest governing authority, supported by an experienced senior management team. Board members are appointed based on their qualifications, professional expertise, and alignment with the Group's mission and values, with shareholder recommendations guiding the selection process.



BOARD COMMITTEES

The Board is supported by an Audit Committee and a Nomination and Remuneration Committee, each structured in line with the composition requirements of the Governance Rules. When necessary, and in accordance with the Articles of Association, the Board may establish additional committees to address specific priorities. As mandated by the Governance Rules, the Chairperson does not serve on either the Audit Committee or the Nomination and Remuneration Committee.

In 2025, a Sustainability, Strategy and Investment Committee was formed to strengthen Lulu Retail's governance of sustainable growth and long-term value creation. The Committee provides strategic oversight on key ESG priorities, supports innovation and investment decisions, and ensures that sustainability considerations are embedded into the organisation's overall direction.

RISK MANAGEMENT

Effective risk management is fundamental to building a sustainable and resilient organisation. Lulu Retail follows rigorous standards in this area, supported by clear policies, well-defined procedures, and a structured approach to identifying and addressing potential challenges. Through our Enterprise Risk Management system, we maintain a comprehensive risk register that includes ESG-related risks, allowing us to regularly evaluate and respond to issues that may have a material impact on our operations.

By integrating ESG considerations into our broader risk framework, we strengthen our organisation's resilience, enhance stakeholder confidence, and reinforce the foundations for long-term, sustainable growth. This integrated approach allows us to proactively monitor and address ESG-related risks, which fall into three core categories:

Environmental Risks

We strive to reduce our environmental footprint by managing resources efficiently, addressing climate-related risks, and lowering our carbon emissions.



Social Risks

We place strong emphasis on engaging with our communities, promoting fair labour practices, and maintaining ethical standards throughout our value chain. Our efforts include meaningful community outreach, fostering a diverse and safe workplace, and tracking supplier performance.



Governance Risks

We strive to conduct our business with integrity at every level. Through rigorous risk oversight and open, comprehensive ESG reporting, we ensure our operations remain transparent and accountable. Our Board plays a central role in overseeing this governance structure, supported by clear reporting channels that keep stakeholders informed and engaged.



While ESG risks are currently integrated within the broader ERM framework, Lulu Retail recognises the importance of further strengthening ESG-specific risk identification, analytics, and reporting. Accordingly, enhanced alignment between ERM and ESG risk management is planned as part of the Group's FY 2026 ERM roadmap. This will include clearer ESG risk categorisation, improved risk analytics and monitoring, and stronger collaboration across ERM, ESG, Compliance, Internal Control, and relevant business functions.

Promoting a Culture of Responsibility

BUSINESS ETHICS

Lulu Retail is guided by a comprehensive set of policies that reflect our commitment to responsible and ethical business conduct. These include our ESG Policy, Anti-Bribery and Corruption Policy and Procedure, [Supplier Code of Conduct](#), and Employee Code of Conduct. Each policy is clearly communicated to employees, business partners, and other stakeholders to ensure full alignment with our values and expectations.

Our Code of Conduct and Business Ethics Policy outline the standards of behaviour we expect from our employees across the organisation. It applies to all employees as well as third parties acting on our behalf, setting clear expectations related to ethical business practice, safeguarding company assets, data privacy

and confidentiality, anti-bribery and anti-corruption requirements, and the management of conflicts of interest. The Code serves as a practical guide to maintaining integrity in every aspect of our work.

Our Supplier Code of Conduct extends these principles across our supply chain. It requires suppliers to uphold responsible business practices, including fair labour standards, safe working environments, and strict prohibitions on forced or child labour. It reinforces expectations around non-discrimination, environmental responsibility, anti-corruption measures, and the protection of intellectual property, ensuring that our partners operate with the same values that guide us.



Other policies in operation



Insider Trading Policy



Related Party Transactions Policy



Anti-Money Laundering (AML) and Sanctions Policy and Procedure



Whistleblowing Policy and Procedure



Board Remuneration Policy

We maintain a zero-tolerance approach to corruption across all operations. In several regions, corruption risk assessments are carried out to identify and evaluate potential vulnerabilities across functions, mandates, and stakeholder relationships. These processes help strengthen internal controls and protect against misconduct. No incidents of corruption have been reported within Lulu Retail over the past three years, underscoring the effectiveness of our policies and the strength of our compliance culture.

INDICATOR	UNIT	2023	2024	2025
Corruption incidents	#	0	0	0
Percentage of operations assessed for risks related to corruption	%	100	100	100

CONFLICT OF INTEREST

Lulu Retail is committed to conducting business with integrity at every level of the organisation. We take a proactive approach to identifying and managing potential conflicts of interest, whether financial, professional, or personal, and we encourage employees and partners to be transparent about situations that may give rise to them. Any concerns that do emerge

are carefully reviewed and addressed by the Board to ensure full accountability and alignment with our ethical standards. No critical concerns were raised during the year, reflecting the strength of our governance practices and the trust placed in them.

Human Rights

We strive to ensure that human rights are respected across all aspects of our operations. In every country where we operate, we comply fully with local laws while also using our reach and influence to contribute positively to the wellbeing of people and communities.

Our Human Rights Policy reflects international best practice and is aligned with the UN Global Compact and the UN Guiding Principles on Business and Human Rights. It sets out our responsibility to uphold fundamental rights and freedoms, promote equal opportunities, prevent discrimination, and maintain a workplace grounded in safety, dignity, and respect.

This Policy applies to all Lulu Retail operations worldwide, and employees receive dedicated training to reinforce awareness and compliance. In 2025, we delivered 157,311 hours of human rights training, reinforcing our commitment to building awareness and embedding these principles across the organisation.

Employee training hours on human rights

Hours

2023 2024 2025



Championing Responsible Sourcing

Lulu Retail relies on a global supply chain spanning multiple regions and product categories. With this scale comes a responsibility to ensure that procurement practices uphold strong environmental, social, and ethical standards. Our responsible sourcing approach focuses on transparency, supplier accountability, and strengthening local economies, while ensuring our supply chain supports sustainable and resilient business growth.

At the foundation of this approach is our Supplier Code of Conduct, which outlines expectations related to labour rights, ethical conduct, environmental stewardship, sustainable sourcing, and transparent communication. The Code applies to all suppliers, subcontractors, intermediaries, and their employees. Non-compliance is addressed through a defined escalation process that may include corrective action plans or, where necessary, suspension or termination of the supplier relationship.

Supporting local economies is also a key priority. Across our regions, we continue to increase sourcing from local suppliers, helping reduce transportation-related emissions and strengthening national economic participation. Looking ahead, Lulu Retail intends to evaluate its major suppliers against environmental and social criteria to strengthen ESG alignment across the supply chain.

Lulu Retail's sourcing practices vary across regions, reflecting differences in scale, regulatory environments, and supplier maturity. Across all markets, we aim to strengthen responsible procurement, enhance supplier engagement, and advance environmental and social due diligence.

In the UAE, one of our largest and most diverse sourcing networks, supplier selection and engagement are managed centrally under the Business Development Agreement (BDA), ensuring consistent standards across all suppliers. Supplier screening is coordinated at the central level, enabling robust governance across the supplier base. Local sourcing initiatives align with UAE national priorities such as the ICV programme, and supplier engagement is routinely done by an external agency to drive continuous improvement.



Saudi Arabia operates one of Lulu Retail's most complex sourcing ecosystems, supplying a significant number of stores with leading brands, private-label products, and specialised items. Advanced warehousing and inventory management systems ensure efficient storage, rapid replenishment, and consistent product availability.

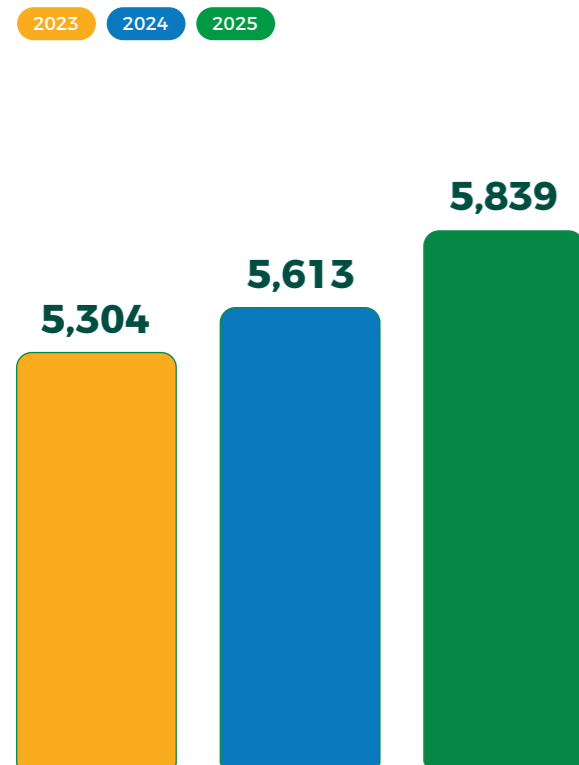
Qatar enforces rigorous supplier prequalification and quality assurance programmes, embedding environmental and social considerations into supplier assessments. Like other regions, the supplier selection process in Oman involves strict evaluation criteria such as product quality, reliability and stability. Kuwait follows strict group level guidelines for procurement, prioritizing local suppliers and producers wherever possible.

All our regions follow ethical sourcing practices, focusing on strong supplier relationships, consistent quality standards, and initiatives that promote reliability and long-term partnerships across the supply chain.

In 2025, LuLu Retail increased its procurement spend on local suppliers to approximately USD 5.8 billion, representing a growth of around 4% compared to 2024. Local sourcing continued to account for a substantial share of total procurement spend, reaching 82.7%, reflecting the Group's ongoing commitment to supporting local economies, strengthening supplier relationships, and enhancing supply chain resilience across its operating markets.

Procurement spending on local suppliers

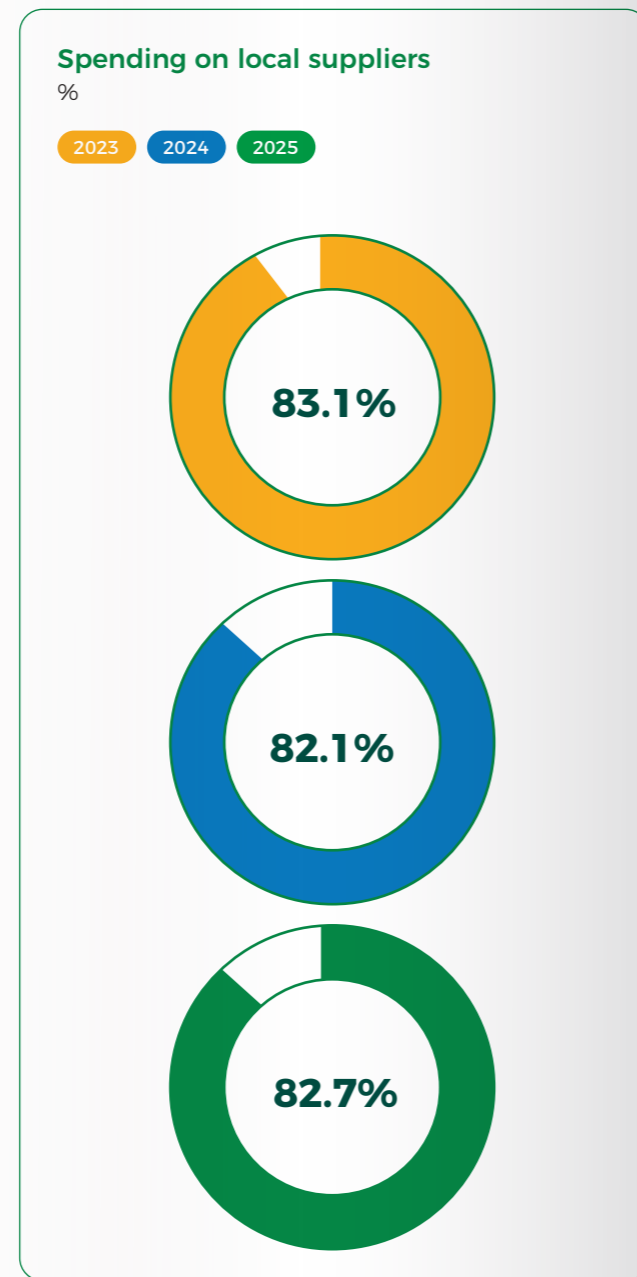
In million USD (Rounded)



Spending on local suppliers

%

2023 2024 2025



Protecting Data Privacy and Security

Lulu Retail places the utmost importance on safeguarding data privacy and security. A strong governance framework, paired with rigorous technical controls, enables us to protect sensitive information, uphold regulatory standards, and reinforce the trust our stakeholders place in us.

Our commitment is anchored in a comprehensive Data Privacy Policy that clearly outlines how personal data is collected, processed, stored, and retained across our operations. Aligned with the UAE Personal Data Protection Law (PDPL) requirements and informed by international best practices, including General Data Protection Regulation (GDPR) principles, the policy explains user rights, establishes transparent communication channels, and guides individuals on how to manage their information and preferences.

The Information Technology (IT) Department plays a central role in operationalising this commitment. The team oversees our entire digital ecosystem from data centres, networks, and cloud infrastructure to SAP, retail systems, and ecommerce platforms ensuring that robust protections are embedded at every layer. Employees receive regular training and awareness sessions, supported by ongoing communications such as cybersecurity newsletters, reminders on password hygiene, and guidance on emerging threats. These efforts help employees understand the critical role they play in maintaining a secure environment.

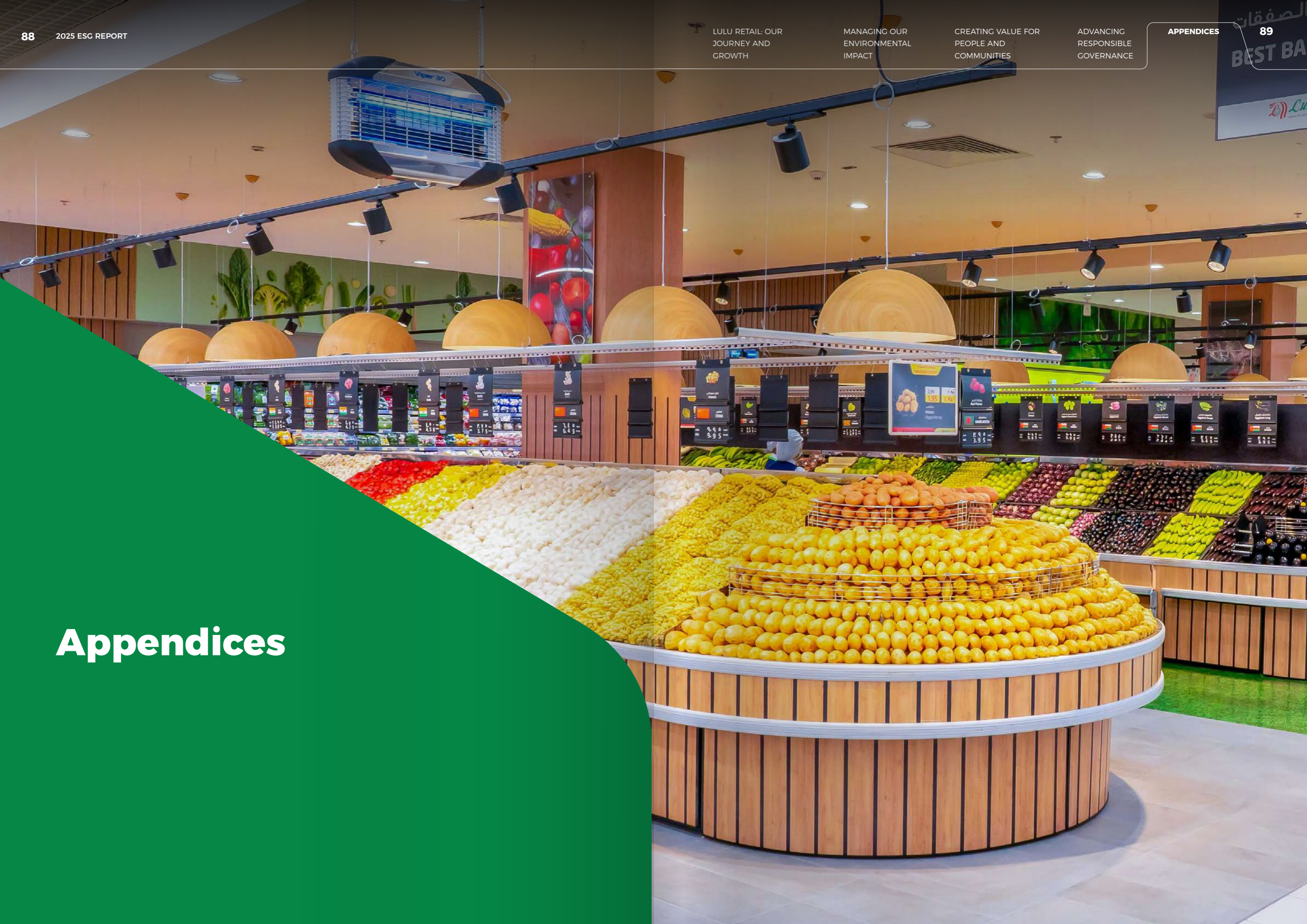
IN 2025, LULU RETAIL RECORDED NO SUBSTANTIATED INCIDENTS OF DATA BREACHES OR CUSTOMER PRIVACY VIOLATIONS.

Our cybersecurity and resilience measures include:

- **Security Assessments:** Quarterly vulnerability assessments, annual internal and external penetration tests, PCI-DSS aligned Approved Scanning Vendor (ASV) scans, and red teaming activities
- **Proactive Monitoring:** Continuous Security Operations Center (SOC) monitoring of critical systems, including brand reputation, external threat surface, and dark web monitoring
- **Employee Awareness:** Regular awareness sessions, phishing simulation exercises, and advisory communications to strengthen security culture
- **Compliance & Standards:** Regular compliance monitoring, SWIFT Customer Security Programme (CSP) annual attestation for 2025, and plans to implement National Institute of Standards and Technology (NIST)/ISO 27001 frameworks
- **Risk Mitigation:** Cyber insurance policy is in place to cover potential incidents

Together, these measures reflect a holistic, forward-looking approach to data protection, combining robust policy foundations, advanced technical safeguards, continuous risk monitoring, and strong employee awareness to ensure secure and trusted digital interactions throughout Lulu Retail's global operations.

Indicator	UNIT	2023	2024	2025
Incidents of data breaches	#	0	0	0
Incidents of data losses	#	0	0	0
Cyber-attacks	#	0	0	0
Attempted cyber-attacks	#	0	0	0



Appendices



Appendix A: GRI Standards Content Index

Statement of use	Lulu Group International has reported in accordance with the GRI Standards for the period 1st January 2025 to 31st December 2025
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	None

GRI STANDARD OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION			GRI SECTOR STANDARD REF. NO.
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
General disclosures						
	2-1 Organizational details	13-15				
	2-2 Entities included in the organization's sustainability reporting	5				
	2-3 Reporting period, frequency and contact point	5				
	2-4 Restatements of information	38				
	2-5 External assurance	Report is not assured externally				
	2-6 Activities, value chain and other business relationships	13				
GRI 2: General Disclosures 2021	2-7 Employees	50-54				
	2-8 Workers who are not employees	Contract workers: 2,811				
	2-9 Governance structure and composition	80-81				
	2-10 Nomination and selection of the highest governance body	80-81				
	2-11 Chair of the highest governance body	80-81				
	2-12 Role of the highest governance body in overseeing the management of impacts	24-25, 80-81				
	2-13 Delegation of responsibility for managing impacts	24-25, 80-81				

A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.



GRI STANDARD OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION			GRI SECTOR STANDARD REF. NO.
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GRI 2: General Disclosures 2021	2-14 Role of the highest governance body in sustainability reporting	24-25, 80-81				
	2-15 Conflicts of interest	83				
	2-16 Communication of critical concerns	83				
	2-17 Collective knowledge of the highest governance body	80-81				
	2-18 Evaluation of the performance of the highest governance body	Not disclosed		Confidentiality constraints	Due to confidentiality concerns, this information has been withheld from the ESG report, ensuring the protection of sensitive data.	
	2-19 Remuneration policies	Lulu Retail's board remuneration is governed by a Board Remuneration Policy				
	2-20 Process to determine remuneration	Outlined in the Board Remuneration Policy				
	2-21 Annual total compensation ratio	Not disclosed		Confidentiality constraints	While not widely prevalent in the UAE, we appreciate the significance of reporting such information and recognise its inherent value.	
	2-22 Statement on sustainable development strategy	6-11				
	2-23 Policy commitments	24, 25, 32, 43, 49, 82-84, 87				
	2-24 Embedding policy commitments	24, 25, 32, 43, 49, 82-84, 87				
	2-25 Processes to remediate negative impacts	57, 63-69				
	2-26 Mechanisms for seeking advice and raising concerns	26, 57, 82-84				
	2-27 Compliance with laws and regulations	82-83				
	2-28 Membership associations	20-21				
	2-29 Approach to stakeholder engagement	26				
	2-30 Collective bargaining agreements	Not disclosed		Legal prohibitions	In accordance with country's laws and regulations for labour unions	
Material topics						
GRI 3: Material Topics 2021	3-1 Process to determine material topics	27				
	3-2 List of material topics	27				
			A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.			



GRI STANDARD OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION			GRI SECTOR STANDARD REF. NO.
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
Procurement						
GRI 3: Material Topics 2021	3-3 Management of material topics	85-86				
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	86				
Business Ethics						
GRI 3: Material Topics 2021	3-3 Management of material topics	82-83				
	205-1 Operations assessed for risks related to corruption	82-83				
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	82-83				
	205-3 Confirmed incidents of corruption and actions taken	82-83				
Energy						
GRI 3: Material Topics 2021	3-3 Management of material topics	33-35				
	302-1 Energy consumption within the organization	34				
	302-2 Energy consumption outside of the organization	33-35				
GRI 302: Energy 2016	302-3 Energy intensity	34				
	302-4 Reduction of energy consumption	33-35				
	302-5 Reductions in energy requirements of products and services	Not disclosed		Information unavailable/incomplete	Data is monitored but requires further analysis.	
Water and Effluents						
GRI 3: Material Topics 2021	3-3 Management of material topics	45				
	303-1 Interactions with water as a shared resource	45				
	303-2 Management of water discharge-related impacts	45				
GRI 303: Water and Effluents 2018	303-3 Water withdrawal	Not disclosed				
	303-4 Water discharge	Not disclosed				
	303-5 Water consumption	45				



GRI STANDARD OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION			GRI SECTOR STANDARD REF. NO.
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
Climate Change/Emissions						
GRI 3: Material Topics 2021 GRI 3: Material Topics 2021	3-3 Management of material topics	36-39				
	305-1 Direct (Scope 1) GHG emissions	38				
	305-2 Energy indirect (Scope 2) GHG emissions	38				
	305-3 Other indirect (Scope 3) GHG emissions	38, 116				
GRI 305: Emissions 2016	305-4 GHG emissions intensity	38				
	305-5 Reduction of GHG emissions	38				
	305-6 Emissions of ozone-depleting substances (ODS)	116		Information unavailable/ incomplete	Data is not monitored.	
Food Waste						
	3-3 Management of material topics	40-44				
	306-1 Waste generation and significant waste-related impacts	40-44				
GRI 3: Material Topics 2021	306-2 Management of significant waste-related impacts	42				
	306-3 Waste generated	44				
	306-4 Waste diverted from disposal	44				
	306-5 Waste directed to disposal	44				
Packaging Waste						
	306-1 Waste generation and significant waste-related impacts	40-44				
	306-2 Management of significant waste-related impacts	42				
GRI 306: Waste 2020	306-3 Waste generated	44				
	306-4 Waste diverted from disposal	44				
	306-5 Waste directed to disposal	44				



GRI STANDARD OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION			GRI SECTOR STANDARD REF. NO.
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
Employment						
GRI 3: Material Topics GRI 3: Material Topics 2021 2021	3-3 Management of material topics	48-49				
	401-1 New employee hires and employee turnover	51				
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	53				
	401-3 Parental leave	53				
Health and Safety						
	3-3 Management of material topics	63-66				
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	63-66				
	403-2 Hazard identification, risk assessment, and incident investigation	63-66				
	403-3 Occupational health services	63-66				
	403-4 Worker participation, consultation, and communication on occupational health and safety	63-66				
	403-5 Worker training on occupational health and safety	66				
	403-6 Promotion of worker health	63-66				
GRI 403: Occupational Health and Safety 2018	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	63-66				
	403-8 Workers covered by an occupational health and safety management system	63-66				
	403-9 Work-related injuries	66				
	403-10 Work-related ill health	Not disclosed		Information unavailable/incomplete	The data measurement systems at the Group level are currently being established.	
Training and Development						
	3-3 Management of material topics	58-62				
	404-1 Average hours of training per year per employee	62				
GRI 3: Material Topics 2021	404-2 Programs for upgrading employee skills and transition assistance programs	59-60				
	404-3 Percentage of employees receiving regular performance and career development reviews	Not disclosed		Information unavailable/incomplete	Data is not monitored currently.	



GRI STANDARD OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION			GRI SECTOR STANDARD REF. NO.
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
Workforce Empowerment						
GRI 405: Diversity and Equal Opportunity 2016	3-3 Management of material topics	48-57				
	405-1 Diversity of governance bodies and employees	56, 80				
	405-2 Ratio of basic salary and remuneration of women to men	Not disclosed		Confidentiality constraints	Information cannot be disclosed.	
Non-discrimination						
GRI 3: Material Topics 2021	3-3 Management of material topics	57				
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	57				
Local Communities						
GRI 3: Material Topics 2021	3-3 Management of material topics	70-77				
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	70-77				
	413-2 Operations with significant actual and potential negative impacts on local communities	70-77				
Healthy and High-Quality Products						
GRI 3: Material Topics 2021	3-3 Management of material topics	67-69				
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	67-69				
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	67-69				
Marketing and Labeling						
GRI 3: Material Topics 2021	3-3 Management of material topics	67-69				
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	67-69				
	417-2 Incidents of non-compliance concerning product and service information and labeling	67-69				
	417-3 Incidents of non-compliance concerning marketing communications	67-69				



GRI STANDARD OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION			GRI SECTOR STANDARD REF. NO.
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
Data Privacy and Security						
GRI 3: Material Topics 2021	3-3 Management of material topics	87				
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	87				
We also report on topics that are not covered by the GRI standards.						
Human Rights						
GRI 3: Material Topics 2021	3-3 Management of material topics	84				



Appendix B: ADX ESG Disclosures

As a listed entity on the Abu Dhabi Securities Exchange (ADX), Lulu Retail aligns with ADX’s ESG disclosure guidance. The voluntary guidance provides ADX listed companies with ESG indicators that are considered essential to report in alignment with recognised global frameworks, such as UN Sustainable Development Goals (SDGs), Global Reporting Initiative (GRI), and recommendations from the Sustainable Stock Exchanges Initiative (SSEI) and World Federation of Exchanges (WFE).

Metric	Indicator	Standard Alignment	Section in the report	Answer/Location in the report
Category: Environment				
E1. Environmental Operations	E1.1) Does your company follow a formal Environmental Policy? Yes/No	GRI, GCC ESG Metrics, UN SDG 3	Advancing Environmental Management	24-25
	E1.2) Does your company follow specific waste, water, energy, and/or recycling policies? Yes/No		Advancing Environmental Management	24-25
	E1.3) Does your company use a recognised energy management system? Yes/No		Advancing Environmental Management	Yes
E2. Water Usage	E2.1) Total amount of water consumed	GRI, GCC ESG Metrics, UN SDG 6	Enhancing Water Stewardship	45
	E2.2) Total amount of water reclaimed			Not applicable
E3. Waste Generation	E3.1) Total waste generated per waste type	GRI, UN SDG 12	Promoting Circularity and Waste Reduction	44
	E3.2) Percentage of waste recycled, per waste type			44
E4. Energy Usage	E4.1) Total amount of energy directly consumed	GRI, GCC ESG Metrics, UN SDG 12	Accelerating Energy Efficiency and Climate Action	34
	E4.2) Total amount of energy indirectly consumed			34
E5. Energy Intensity	E5.1) Total direct energy usage per output scaling factor	GRI, GCC ESG Metrics, UN SDG 12	Accelerating Energy Efficiency and Climate Action	34
E6. Energy Mix	E6.1) Percentage: Energy usage by generation type	GRI, GCC ESG Metrics, UN SDG 12	Accelerating Energy Efficiency and Climate Action	34
E7. GHG Emissions	E7.1) Total amount in CO2 equivalents, for Scope 1	GRI, GCC ESG Metrics, UN SDG 13	Accelerating Energy Efficiency and Climate Action	38
	E7.2) Total amount, in CO2 equivalents, for Scope 2 (if) applicable			38
	E7.3) Total amount, in CO2 equivalents, for Scope 3 (if) applicable			38



Metric	Indicator	Standard Alignment	Section in the report	Answer/Location in the report
E8. Emissions Intensity	E8.1) Total GHG emissions per output scaling factor	GRI, GCC ESG Metrics, UN SDG 13	Accelerating Energy Efficiency and Climate Action	38
E9. Climate Strategy	E9.1) Describe the climate-related risks and opportunities that could reasonably be expected to affect your organisation's prospects. Also explain, for each climate-related risk your organisation has identified, whether your organisation considers the risk to be a climate-related physical risk or transition risk.	UN SDG 13	Accelerating Energy Efficiency and Climate Action	36
E10. Climate Related Risks and Opportunities	E10.1) Describe the processes and policies your organisation uses to identify, assess, prioritise, and monitor climate-related risks, and the inputs and parameters used in these processes.	UN SDG 13	Accelerating Energy Efficiency and Climate Action	36
	E10.2) Whether and how does your organisation use climate-related scenario analysis to inform the identification of climaterelated risks?			36
Category: Social				
S5. Temporary Worker Ratio	S5.1) Percentage: Total enterprise headcount held by part-time employees	GRI, GCC ESG Metrics	-	386 part-time employees
	S5.2) Percentage: Total enterprise headcount held by contractors and/or consultants			2,811 contractual employees
S6. Nationalisation	S6.1) Percentage of national employees, per employment category	GRI, GCC ESG Metrics	Building Workforce Resilience	54
S7. Non-Discrimination	S7.1) Does your company follow non-discrimination policy? Yes/No	GRI, GCC ESG Metrics, UN SDG 10	Fostering Workplace Diversity and Equity	57
S8. Health, Safety and Wellbeing	S8.1) Does your company follow an occupational health and/or health & safety policy? Yes/No	GRI, GCC ESG Metrics, UN SDG 3	Embedding a Culture of Safety	63
S9. Injury Rate	S9.1) Percentage: Frequency Metrics of injury events relative to total workforce time	GRI, GCC ESG Metrics, UN SDG 3	Embedding a Culture of Safety	66
S10. Child and Forced Labor	S10.1) Does your company follow a child and/or forced labour policy? Yes/No	GRI, GCC ESG Metrics, UN SDG 8	Promoting a Culture of Responsibility	82
	S10.2) If yes, does your child and/or forced labour policy also cover suppliers and vendors? Yes/No			82
S11. Human Rights	S11.1) Does your company follow a human rights policy? Yes/No	GRI, GCC ESG Metrics, UN SDG 10	Human Rights	84
S12. Community Investment	S12.1) Amount invested in the community, as a percentage of company revenues.	GRI, GCC ESG Metrics, UN SDG 8	Contributing to Community Progress	76
Category: Governance				
G1. Board Independence	G1.1) Does company prohibit CEO from serving as board chair? Yes/No	GCC ESG Metrics	Strengthening Governance and Oversight	Yes
	G1.2) Percentage: Total board seats occupied by independent board members			80
G2. Board Diversity	G2.1) Percentage: Total board seats occupied by men and women	GRI, GCC ESG Metrics	Strengthening Governance and Oversight	80



Metric	Indicator	Standard Alignment	Section in the report	Answer/Location in the report
G3. Supplier Code of Conduct	G3.1) Are your vendors or suppliers required to follow a Code of Conduct? Yes/No	GRI, GCC ESG Metrics, UN SDG 12	Championing Responsible Sourcing	85-86
G4. Ethics and Prevention of Corruption	G4.1) Does your company follow an Ethics and/or Prevention of Corruption policy? Yes/No	GRI, GCC ESG Metrics, UN SDG 16	Promoting a Culture of Responsibility	82-83
G5. Data Privacy	G5.1) Does your company follow a Data Privacy policy? Yes/No	GRI, GCC ESG Metrics	Protecting Data Privacy and Security	87
	G5.2) Has your company taken steps to comply with GDPR rules? Yes/No			87
G7. Sustainability Risks Management	G7.1) Describe the processes and policies your organisation uses to identify, assess, prioritise, and monitor sustainability-related risks, and the inputs and parameters used in these processes.		Integrating Sustainability Across Our Business	24-27, 91
	G7.2) How are the processes for identifying, assessing, prioritising and monitoring sustainability-related risks and opportunities integrated into and informing your organisation's overall enterprise risk management process?			
G8. Sustainability Governance	G8.1) Which governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) is responsible for oversight of sustainability related risks and opportunities?	-	Integrating Sustainability Across Our Business	24-27
	G8.2) How does the body or individual consider sustainability-related risks and opportunities when overseeing your organisation's strategy?			
	G8.4) Has your organisation delegated the role of overseeing sustainability-related risks and opportunities to a specific management-level position or committee, and how is oversight over this role or committee exercised?			
G9. Sustainability Targets	G9.1) What metrics does your organisation use to measure and monitor each sustainability-related risk or opportunity identified above?	-	Integrating Sustainability Across Our Business	24-27
G10. Disclosure Practices	G10.1) Does your company publish a sustainability report? Yes/No	-	About this Report	Yes
	G10.2) Does your company publish a GRI, IFRS, CDP, SASB, IIRC, or UNGC based report?	-	About this Report	GRI, SASB
G11. External Assurance	G11.1) Are your sustainability disclosures assured or verified by a third-party audit firm? Yes/No	GRI, GCC ESG Metrics	About this Report	Report is not assured externally
Category: Integrated KPIs				
I1. Sustainability Reporting	I1.1) Does your company publish a sustainability report? Yes/No	GRI, UNGC	About this Report	Yes
I3. Stakeholder Engagement	I3.1) Does your company engage with stakeholders on ESG/sustainability topics? Yes/No	GRI, UNGC	Integrating Sustainability Across Our Business	Yes
	I3.2) If yes, report on frequency and effectiveness of engagement.			26



Appendix C: Alignment with UN SDGs

UN SDG	GRI Standards Disclosure	Reference to Section	Page Number(s)
SDG 2: Zero Hunger	GRI 413-2	Contributing to Community Progress	70-77
SDG 3: Good Health and Wellbeing	GRI 305, 401, 403	Accelerating Energy Efficiency and Climate Action	33-39
		Embedding a Culture of Safety	63-66
SDG 4: Quality Education	GRI 404	Developing Talent and Capability	58-62
SDG 5: Gender Equality	GRI 401, 404, 406	Fostering Workplace Diversity and Equity	55-57
SDG 6: Clean Water and Sanitation	GRI 303	Enhancing Water Stewardship	45
SDG 7: Affordable and Clean Energy	GRI 302	Advancing Environmental Management	30-32
		Accelerating Energy Efficiency and Climate Action	33-35
SDG 8: Decent Work and Economic Growth	GRI 403, 404, 302, 401	Accelerating Energy Efficiency and Climate Action	33-39
		Building Workforce Resilience	48-54
		Developing Talent and Capability	58-62
		Embedding a Culture of Safety	63-66

UN SDG	GRI Standards Disclosure	Reference to Section	Page Number(s)
SDG 12: Responsible Consumption and Production	GRI 302, 303, 305, 306	Accelerating Energy Efficiency and Climate Action	33-39
		Promoting Circularity and Waste Reduction	40-44
		Enhancing Water Stewardship	45
SDG 13: Climate Action	GRI 302, 305	Accelerating Energy Efficiency and Climate Action	33-39
SDG 14: Life Below Water	GRI 305	Accelerating Energy Efficiency and Climate Action	33-39
SDG 15: Life on Land	GRI 305	Accelerating Energy Efficiency and Climate Action	33-39
SDG 16: Peace, Justice and Strong Institutions	GRI 2-9, 2-10, 2-11, 2-12, 2-23, 205, 416-2, 417-2, 417-3, 418-1	Strengthening Governance and Oversight	80-81
		Championing Responsible Sourcing	85-86
SDG 17: Partnerships for the Goals	N/A	Our Certifications and Awards	16-19
		Our Memberships of Associations	20-21



Appendix D: SASB Index

Lulu Retail’s sustainability information is aligned with SASB Standard for Food & Beverage - Food Retailers & Distributors and Multiline and Specialty Retailers & Distributors. In the coming years, Lulu Retail endeavours to align its reporting with evolving global and national sustainability standards to transparently disclose relevant sustainability risks and opportunities. The index below provides topic disclosures that are material to Lulu Retail.

Topic	Metric	Unit of Measure	Relevant SASB Industry	Relevant SASB Code	Page number(s) and/or direct answers
Air Emissions from Refrigeration	Gross global Scope 1 emissions from refrigerants	Metric tonnes (t) CO ₂ -e	Food & Beverage-Food Retailers & Distributors	FB-FR-110b.1	38, 116
Energy Management	Operational energy consumed	Gigajoules (GJ)		FB-FR-130a.1	34
	Percentage renewable	Percentage (%)			39
Food Waste Management	Amount of food waste generated	Metric tonnes (t)		FB-FR-150a.1	44
Product Health & Nutrition	Discussion of the process to identify and manage products and ingredients related to nutritional and health concerns among consumers	n/a		FB-FR-260a.2	67-68
Product Labelling & Marketing	Number of incidents of non-compliance with industry or regulatory labelling or marketing codes	Number		FB-FR-270a.1	67-68
Management of Environmental & Social Impacts in the Supply Chain	Discussion of strategies to reduce the environmental impact of packaging	n/a		FB-FR-430a.4	40-42
Energy Management in Retail & Distribution	Total energy consumed	Gigajoules (GJ)	Consumer Goods - Multiline and Specialty Retailers & Distributors	CG-MR-130a.1	34
	Percentage grid electricity	Percentage (%)			34
Workforce Diversity & Inclusion	Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management and (c) all other employees	Percentage (%)		CG-MR-330a.1	50
Product Sourcing, Packaging & Marketing	Discussion of strategies to reduce the environmental impact of packaging	n/a		CG-MR-410a.3	40-42



Topic	Metric	Unit of Measure	Relevant SASB Industry	Relevant SASB Code	Page number(s) and/or direct answers
Data Security	Description of approach to identifying and addressing data security risks	n/a	Consumer Goods - Multiline and Specialty Retailers & Distributors and Food & Beverage - Food Retailers & Distributors	CG-MR-230a.1 FB-FR-230a.2	87
	Number of data breaches	Number		0	
	Percentage involving personally identifiable information (PII)	Percentage (%)		CG-MR-230a.2 FB-FR-230a.1	0
	Number of customers affected	Number		0	



Appendix E: GHG Emission Methodology

In 2025, Lulu Retail conducted a comprehensive assessment of its GHG emissions inventory. In addition to continuing the monitoring of Scope 1 and Scope 2 emissions, Lulu Retail identified and initiated the tracking of relevant Scope 3 emission categories. While most applicable Scope 3 categories are already disclosed, the remaining categories are being internally monitored, with ongoing efforts to enhance data accuracy and completeness for future reporting

The emission factors applied in the calculation of GHG emissions include the UK BEIS GHG Conversion Factors for Scope 1, the latest IEA Emission Factors for Scope 2, and where applicable, these and/or US EEIO Emission Factors and Agribalyse for relevant Scope 3 categories.

Scope	Type/Category	Emissions in 2025 (tCO2e)
Scope 1	Stationary Combustion	8,921
	Mobile Combustion	42,159
	Refrigerant Gases & Others	Kyoto gases: 120,306; Non Kyoto gases: 28,127
	Fire Suppression	724
Scope 2	Purchased Electricity	486,315
	Purchased District Cooling	3,790
Scope 3	Purchased Goods and Services (Cat. 1)	283,346
	Capital Goods (Cat. 2)	7,698
	Fuel & Energy Related Activities (Cat. 3)	195,282
	Waste Generated in Operations (Cat. 5)	57,781
	Employee Commuting (Cat. 7)	53,355

Appendix F: Abbreviations

ADAFSA	Abu Dhabi Agriculture and Food Safety Authority	GRI	Global Reporting Initiative
ADX	Abu Dhabi Securities Exchange	GSO	Gulf Standardization Organization
AED	United Arab Emirates Dirham	HACCP	Hazard Analysis and Critical Control Point
AML	Anti-Money Laundering	HR	Human Resource
ASV	Approved Scanning Vendor	HRH	His Royal Highness
ATM	Automated Teller Machine	HRMS	Human Resources Management System
BDA	Business Development Agreement	HSE	Health, Safety, and Environment
BEVs	Battery Electric Vehicles	HVAC	Heating, Ventilation, and Air Conditioning
BMS	Building Management Systems	ICC	International Chamber of Commerce
CEO	Chief Executive Officer	ICV	In-Country Value
CNG	Compressed Natural Gas	IEA	International Energy Agency
CO ₂	Carbon Dioxide	IFRS	International Financial Reporting Standards
CPA	Consumer Protections Authority	IPCC	Inter-governmental Panel on Climate Change
CSO	Chief Sustainability Officer	IT	Information Technology
CSR	Corporate Social Responsibility	KG	Kilogram
CWEIC	Commonwealth Enterprise and Investment Council	KSA	Kingdom of Saudi Arabia
DIP	Dubai Investments Park	LMS	Learning Management System
ED	Executive Director	ME	Middle East
EMS	Environmental Management System	MRF	Middle East Retail Forum
EPR	Extended Producer Responsibility	MWh	Megawatt-hour
ESG	Environmental, Social, And Governance	NGOs	Non-Governmental Organisations
EU	European Union	NJCC	New Jersey Chamber of Commerce
FIFO	First-In, First-Out	OHS	Occupational Health and Safety
FY	Fiscal Year	OJT	On-the-Job
GCC	Gulf Cooperation Council	OSHA	Occupational Safety and Health Administration
GDPR	General Data Protection Regulation	PCI-DSS	Payment Card Industry Data Security Standard
GHG	Greenhouse Gas	PDPL	Personal Data Protection Law
GJ	Gigajoule		
GMO	Genetically Modified Organism		

POS	Point-of-Sale
PPE	Personal Protective Equipment
PV	Photovoltaic
QAIC	Qatar America Institute for Culture
QBA	Qatari Businessmen Association
QBBF	Qatar British Business Forum
QSA	Qualified Security Assessor
RO	Reverse Osmosis
RVM	Reverse Vending Machine
SAP	Systems, Applications, and Products in Data Processing
SASB	Sustainability Accounting Standards Board

SEEC	Saudi Energy Efficiency Center
SME	Small and Medium-sized Enterprise
UAE	United Arab Emirates
UCO	Used Cooking Oil
UK	United Kingdom
UN SDGs	United Nations Sustainable Development Goals
USA	United States of America
USD	United States Dollar
WEF	World Economic Forum

