



RESPONSIBLE
GROWTH

SHAPING A
**SUSTAINABLE
WORLD**





CONTENTS

About this Report	4	DRIVING ACCOUNTABILITY THROUGH GOVERNANCE	60
MESSAGE FROM THE LEADERSHIP	5	Upholding Responsible Governance	62
Foreword from the Chairman	5	Fostering a Culture of Ethics and Integrity	64
Message from the CEO	6	Building a Responsible and Resilient Supply Chain	66
Message from the CSO	8	Safeguarding Customer Privacy and Data Security	68
OVERVIEW OF LULU RETAIL	9	APPENDICES	69
About Lulu Retail	9	GRI Standards Content Index	70
Our Reach and Operations	10	ADX ESG Disclosures	78
Certifications and Awards	12	Alignment with UN SDGs	82
Memberships of Associations	16	SASB Index	84
2024 ESG Highlights	18	Abbreviations	86
SUSTAINABILITY AT OUR CORE	20		
Driving Sustainability Forward	21		
Engaging our Stakeholders	23		
Prioritising What Matters Most	24		
FOSTERING ENVIRONMENTAL SUSTAINABILITY	26		
Strengthening Environmental Management Practices	28		
Accelerating Energy Transition and Mitigating Climate Change	29		
Championing Circular Economy	34		
Adopting Sustainable Water Management Practice	37		
EMPOWERING PEOPLE & COMMUNITIES	38		
Building a Strong and Resilient Workforce	40		
Championing Diversity, Equity, and Inclusion	46		
Cultivating Growth and Professional Development	48		
Ensuring a Safe and Healthy Workplace	51		
Delivering Excellence to Customers	52		
Empowering Communities	55		

ABOUT THIS REPORT

Welcome to Lulu Retail Holdings PLC's (referred to as 'Lulu Retail', or 'We') annual ESG report. While this is the first ESG report for the listed entity, it is the third report for Lulu Retail and the fourth overall for the organisation.

This report provides an overview of our business's ongoing sustainability efforts, highlighting our performance against a range of material environmental, social, and governance (ESG) metrics. It aims to provide our stakeholders, including employees, customers, suppliers, governments and investors, with an update on the progress we have made towards our sustainability goals, and to detail the ESG practices we have adopted in our operations.

The report covers Lulu Retail's retail, wholesale, sourcing, and offshore activities across our operations in 26 countries for the period from January 1 to December 31, 2024.

The report has been prepared in accordance with the universally recognised Global Reporting Initiative (GRI) Standards 2021. In addition, it aligns with the United Nations Sustainable Development Goals (UN SDGs), the Sustainability Accounting Standards Board (SASB) Standards, and with the national development policies and visions of the countries in which we operate. As an Abu Dhabi Securities Exchange (ADX) listed entity, the report is aligned to ADX ESG disclosure guidance.

Moving forward, we will continue to refine our reporting practices in line with best practices, as well as benchmark our sustainability metrics and targets against globally recognised sustainability reporting frameworks in the next reporting cycle.

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.



We welcome any feedback, comments or suggestions related to this report and our ESG performance.

Please email us at: esg@ae.lulumea.com

MESSAGE FROM THE LEADERSHIP

FOREWORD FROM THE CHAIRMAN

Welcome to Lulu Retail's ESG report. The theme of our report this year is 'Responsible Growth: Shaping a Sustainable World.' Within these pages, we outline our sustainability journey in 2024, showcasing how we strive to create a positive impact on people, communities, and the planet, while delivering value to all our stakeholders.

Throughout 2024 we continued to embed sustainability into all of Lulu Retail's operations, progressing initiatives across our three strategic ESG focus areas: Fostering Environmental Sustainability, Empowering People & Communities, and Driving Accountability through Governance.

Guided by our materiality assessment, we continue to innovate to reduce our carbon footprint by reducing our emissions, increasing the use of renewable energy, recycling and reusing to prevent waste, and reducing plastic use. We also continue to increase the ranges of organic and locally sourced foods we sell and to provide more nutritional and environmental information to help our customers make informed choices.

Underpinning our efforts is our commitment to meeting the highest standards of ethics and transparency in our governance, of which this report is an important part.

We know, of course, that today's environmental and social challenges can only be met through concerted collaborative effort, and we work closely with our peers and partners to drive positive impact, not just in our own business but across our industry.

Our successes can only be achieved through the hard work and dedication of all our employees, as well as the support of our investors, suppliers, and customers. I extend my gratitude to all our people and partners for their ongoing efforts to build a sustainable company that benefits all of us.



"We know, of course, that today's environmental and social challenges can only be met through concerted collaborative effort, and we work closely with our peers and partners to drive positive impact, not just in our own business but across our industry."

Mr. Yusuf Ali MA
Chairman



MESSAGE FROM THE CEO

The impacts of climate change, along with social and environmental challenges are increasingly being seen across the globe. It is now clear that for a business to survive and thrive, it must have sustainability at its heart. At Lulu Retail, we understand this and the need to embed sustainability into everything we do. In this report, we present some of the many ways in which we continue to make progress towards this goal.

Lulu Retail is a global retailer, with operations in 26 countries around the world. Therefore, we have both a responsibility and an opportunity to make a real difference in driving positive change across our industry and the communities where we operate. To maximise this impact, we focus our efforts on areas where we can make the greatest difference while minimising our environmental footprint. In doing so, we aim to influence and encourage our employees, partners, customers and other stakeholders to adopt more sustainable practices, so that together we can drive meaningful change.

At the heart of this approach are collaboration and innovation. As part of a wider community, working closely with all our partners is essential to our success. We contribute to global progress by supporting regional priorities and global initiatives, such as the United Nations Sustainable Development Goals (SDGs).

In 2023, we launched our ESG Policy to guide and strengthen our sustainability efforts. This year, building on that, we have established a governance framework to oversee and promote sustainability throughout our organisation. Supporting this, we have implemented several initiatives to drive progress and developed a data-driven approach to ensure our efforts are targeted for maximum impact. This is reinforced by our commitment to continual improvement in everything we do.

As a responsible company, we are committed to the highest standards of corporate governance and align with internationally recognised standards such as the GRI Standards for transparency in reporting. Across our operations we have achieved many ISO certifications, including ISO 14001 and ISO 45001 in UAE during the reporting year. We have also started rolling-out the SAP SuccessFactors human resources solution, which

will help streamline aspects of our HR management and increase efficiencies across our operations.

We continue to minimise our carbon footprint. In Bahrain, we have completed the installation of solar panels at both the sites, and continued the rollout of LED lighting across multiple countries. In Saudi Arabia, we invested SAR 3,218,030 in the installation of energy efficient LED lighting. In the UK, we successfully completed another solar installation this year. Additionally, we have planned solar power projects for five store locations in the UAE. Beyond solar, we have implemented enhanced building management systems across several locations, including Qatar, to improve energy efficiency in our buildings.

Waste and water management are two important areas where we are seeking continual improvement. We have implemented water management strategies in Qatar, Oman and UAE. We work with our partners to reduce both food waste and packaging and have launched more sustainable packaging across the company.

Lulu Retail has always had a strong commitment to the development of our people. In 2024, we launched our new Learning Management System, which will streamline access to training courses and resources for our employees. In total, we provided 1,206,405 (12.3% increase from last year) hours of training across the organisation during the year. We continue to promote diversity and inclusion while expanding opportunities for female employees. In 2024, we saw a further increase in the proportion of female employees across Lulu Retail, to 17.7%.

As a major retailer, we recognise our responsibilities to our customers. We continue to work with our partners to provide nutritional information on our labels, to help consumers make more educated choices. We have also launched more organic and free from additives products in 2024, as well as providing gluten-free and sugar-free options. Sourcing locally is a vital way in which we can support local communities, farmers and small businesses. In 2024, our spend with local suppliers was 82.1% of our total procurement.

At Lulu Retail, we are deeply conscious of our obligations to the local communities in which we operate. We actively support and collaborate with various initiatives, charities, and partners to assist those in need. Our efforts include conducting walkathons to engage with the community and providing flood relief in UAE by distributing food to affected individuals. We have also made significant contributions to charities, such as supporting National Multiple Sclerosis Society (NMSS) in UAE, donating QAR 125,000 to Qatar Cancer Society, SAR 106,652 to Al Baraka Charity Association, SAR 100,000 to Zahra Breast Cancer Association, and SAR 350,499 to support vulnerable communities in Saudi Arabia through Manafith. Through our Convoy of Goodness initiative, we provided essential support and resources to 1,000 households in Oman. Additionally, we support families in need by providing essential grocery items during Ramadan.

All these achievements are possible only because of the hard work of all our employees. I would like to thank every member of the Lulu Retail family for their dedication in helping us make this progress in 2024. I would like to extend my gratitude to the Board of Directors and our stakeholders for their continued support and commitment to our sustainability mission. Thank you for reading this report. I hope it provides valuable insights into our progress to date and our ambitious plans for the future.



“Sourcing locally is a vital way in which we can support local communities, farmers and small businesses. In 2024, our spend with local suppliers was 82.1% of our total procurement.”

Saifee Rupawala
Chief Executive Officer



MESSAGE FROM THE CSO

At Lulu Retail, sustainability is at the heart of our long-term strategy. We prioritise sustainability by integrating it into our core business strategy, setting clear commitments, and regularly reviewing our progress. This ensures that sustainability remains a central focus in all our planning and decision-making processes, in alignment with our ESG Policy.

Lulu Retail has made significant strides in energy efficiency and renewable energy adoption by implementing advanced energy management systems, upgrading to energy-efficient LEDs and HVAC systems, and transitioning to renewable energy sources. Our next key milestones include increasing our solar capacity, with operational projects in the UK, Bahrain, and soon in KSA, as well as plans for five stores running on solar power in the UAE. These efforts will help us further reduce our carbon footprint.

Our commitment to circularity and waste reduction has led to significant progress. Key initiatives include our waste-to-energy initiative, where our recycler converts used cooking oil into biodiesel, and our trade-in program for electronics, which encourages customers to recycle their old devices. Additionally, our Reverse Vending Machines (RVMs) incentivise customers to return plastic bottles and cans, and our uniform take-back program aims to reduce textile waste. We have also amplified our commitment towards eco-friendly packaging and reusable bags to reduce single-use plastics.

We are proud of our achievements in collecting 31.8 million plastic bottles and cans through RVMs and recycling 398,643 litres of cooking oil through recyclers. To further embed sustainability across our supply chain and product offerings, we are expanding our partnerships with suppliers who share our commitment to sustainability. For example, our recent partnership with Unilever promotes sustainable products.

Lulu Retail's sustainability goals are closely aligned with the sustainability objectives of the GCC region. Our initiatives, such as increasing solar capacity, implementing energy-efficient technologies, and promoting circular economy practices, directly contribute to the GCC's goals of reducing carbon emissions and enhancing energy security. Additionally, our efforts to support local communities through CSR activities, sustainable product offerings, and promoting local entrepreneurs align with the region's objectives of fostering social well-being and economic development.

By aligning our sustainability goals with the broader objectives of the GCC region, we aim to contribute positively to the region's sustainable development and create long-term value for our stakeholders.

Mohamed Althaf
Group Director – Global Operations and Chief Sustainability Officer



OVERVIEW OF LULU RETAIL

ABOUT LULU RETAIL

COMPANY PROFILE

Lulu Retail is a multinational conglomerate, headquartered in Abu Dhabi, UAE, and with operating locations around the world. Founded by Yusuff Ali M.A., Lulu Retail has grown into a prominent business with a diverse portfolio that includes retail operations, wholesale, sourcing, and offshore activities. As of 2024, the company boasts an annual turnover of USD 7.6 billion and employs over 53,000 people, establishing itself as a key economic contributor in the Gulf Region.

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 REACH AND OPERATIONS

Lulu Retail is a prominent retailer within the Gulf Cooperation Council (GCC) region, with a presence in 26 countries worldwide. We operate retail outlets in 6 countries, wholesale operations in 8 countries, and sourcing activities in 19 countries, in addition to offshore operations in India.



26

Countries Worldwide



>14m

sq. ft. Total Retail Space



250

Retail Stores



21

Distribution Centres



238m

Footfall



53,618

Employees



CERTIFICATIONS AND AWARDS

CERTIFICATIONS:

We have received certifications across our business and operations reflecting our unwavering dedication to sustainability.



PCI-DSS (Payment Card Industry Data Security Standard) Certification



ISO 22000 Food Safety Management System



Green Building Certification -- GSAS



Received "Gold" Grade in the recent food safety inspection of our central kitchen by Dubai Food Control Authority, Dubai Municipality



Gold certificate from Enviroserve for recycling 33.86 tons of books collected under the books collection drive across UAE



Certification of Appreciation from UAE Food Bank for participation in Ramadan activities and initiatives in 2024



Hazard Analysis and Critical Control Points (HACCP)



ISO 14001 (Environmental Management System)



ISO 9001 (Quality Management System)



Green Certificate for responsibly recycling of 1,015 kg of used clothes



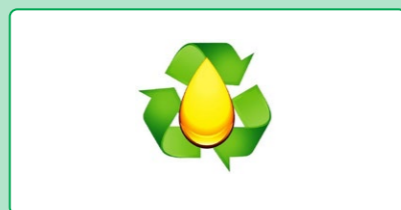
Green Saving Certificate from Neutral Fuels for reducing 294,470 kgs of GHG emissions by contributing 103,145 litres of used cooking oil to produce 97,987.75 litres of biodiesel



Certificate for active contribution from Ministry of Municipality for helping them achieve environment related goals in 2024



ISO 45001 (Occupational Health and Safety Management System)



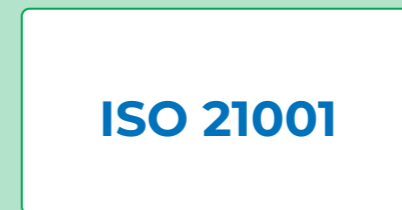
Recycling Certificate for Used Cooking Oil (UCO) for the collection of 66,755 litres of UCO for recycling



Soil Association Certificate for organic products



Recycling Certificate from Al Dhafra Waste Collection LLC for contributing 1049.14 tonnes of cardboards for recycling



ISO 21001 certification, highlighting our commitment to high-quality training



AWARDS AND ACHIEVEMENTS:

In 2024, we attained numerous awards and recognitions, showcasing our leadership in sustainability and commitment to excellence.

Qatar

			
<p>Best CSR Initiative in the Retail Sector by Qatar CSR Summit</p>	<p>Ministry of Commerce and Industry (MOCI) Certificate of thanks and appreciation for actively participating and supporting MOCI's regulation on price control of FMCG goods</p>	<p>Recognition from Federation of Indian Export Organisation for actively supporting Indian trade delegation on export of products from India</p>	<p>Appreciation from Ministry of Municipality for supporting them in their campaigns for World Cleanliness Day by providing support in gifts and space</p>









Oman

			
<p>Awarded by Bank Muscat for the Top Hypermarket Merchant award</p>	<p>Awarded by Royal Oman Police for the services at Musandam</p>	<p>Best Event Activity Award from The Oman Marketing Impact</p>	<p>State Audit Award from Chamber of Commerce in appreciation of the national achievements and gains achieved in the Sultanate of Oman</p>

UAE

		
<p>Most Admired E-commerce Company in Marketing and Customer Reach by the Images ME E-Commerce Award</p>	<p>Most Admired E-commerce Company in Food and Grocery by the Images ME E-Commerce Award</p>	<p>Director General of the Abu Dhabi Civil Defence Authority Excellence Award - First Award Cycle</p>
		
<p>Sheikh Mansour bin Zayed Agriculture Excellence Award by Abu Dhabi Agriculture and Food Safety Authority (ADAFSA)</p>	<p>Recognition from Zayed Higher Organisation for People of Determination for continuous support to display and market products made by People of Determination</p>	

KSA

			
<p>Most Admired Retailer of the Year in Food and Grocery by the Images Retail ME Award</p>	<p>Customer Centricity Award at the CX Awards 2024</p>	<p>Honored with an award from Ministry of Environment, Water, and Agriculture (MEWA) recognising our commitment to supporting local produce and sustainable agriculture</p>	<p>Guinness World Record at the Jeddah Roshn Waterfront by designing the largest flower pot mosaic with 125,00 fresh flowers, in honor of Saudi Arabia's national day</p>
			
<p>Pravasi Parichay Award by Indian Embassy recognising our outstanding contributions and unwavering commitment to fostering strong ties between India and the Kingdom of Saudi Arabia</p>	<p>Prestigious award from the Ministry of Human Resources and Social Development's Mudad program, underscoring our dedication to ensuring fair and timely compensation for all employees, in line with the highest labour rights standards</p>	<p>Honored at the Health Communication Partners' Award Ceremony by Ministry of Health for significant contribution and efforts in public health initiatives</p>	<p>Awarded by Al-Bir Charitable Society in recognition of our efforts in employing members of the local community</p>

Bahrain


<p>Recognised as the number one recruiter for Bahraini nationals by Ministry of Labour</p>

USA


<p>Appreciation Award from the Meadowlands YMCA in New Jersey</p>

MEMBERSHIPS OF ASSOCIATIONS

Our position as a leading retail business allows us to drive positive change in collaboration with a variety of partnerships and memberships.



COMMONWEALTH ENTERPRISE AND INVESTMENT COUNCIL (CWEIC), UK
We are a strategic partner to CWEIC, a commercial, not-for-profit membership organisation that facilitates trade and investment throughout the 56 Commonwealth member nations.



INSTITUTE OF EXPORT AND INTERNATIONAL TRADE
Our membership with the Institute of Export and International Trade provides access to updates, trends, networking opportunities and support in navigating the challenges of operating in international markets.



GREATER BIRMINGHAM CHAMBER OF COMMERCE
As patrons of the Greater Birmingham Chamber of Commerce we have valuable opportunities to connect and partner with some of the most influential figures in the region.



QATAR BRITISH BUSINESS FORUM (QBBF)
Qatar British Business Forum is a non-profit organisation supporting trade between Qatar and the UK, offering opportunities to develop business relationships with individuals and organisations within its network.



QATARI BUSINESSMEN ASSOCIATION (QBA)
QBA strives to serve the vision of Qatar by pursuing ambitious projects that push Qatar forward in the global market.



QATAR CHAMBER OF COMMERCE AND INDUSTRY
One of the oldest chambers in the GCC countries, the main role of the Qatar Chamber of Commerce and Industry is to represent and support the Qatari private sector locally and globally.



INTERNATIONAL CHAMBER OF COMMERCE QATAR
Membership to the International Chamber of Commerce Qatar offers a range of benefits, including access to trends and discoveries in international trade, support and networking opportunities.



US-QATAR BUSINESS COUNCIL (ORYX MEMBERS)
The US-Qatar Business Council facilitates trade between the US and Qatar. We are proud to be Oryx Members of this programme.



SWISS BUSINESS COUNCIL
The Swiss Business Council supports commercial and personal relationships among its members to promote economic, social, and cultural relations between the State of Qatar and Switzerland.



SPANISH BUSINESS COUNCIL
The Official Chamber of Commerce of Spain in Qatar was founded in Doha in 2009. Membership includes exclusive participation in events, opportunities for company presentations and inclusion of contact details in the members' directory.



QATAR AMERICAN CHAMBER OF COMMERCE (AMCHAM QATAR)
The first legally established foreign Chamber of Commerce in Qatar, AmCham Qatar is a non-profit, non-governmental organisation dedicated to fostering trust between Qatar and the United States through trade, commerce and investment.



WORLD ECONOMIC FORUM (WEF)
WEF provides a global, impartial and not-for-profit platform for meaningful connection between stakeholders to establish trust and build initiatives for cooperation and progress.



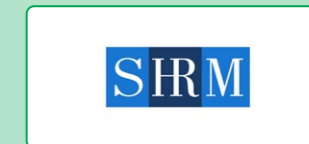
NJ CHAMBER OF COMMERCE (NJCC)
The New Jersey Chamber of Commerce (NJCC) is a key business advocacy organisation that represents companies of all sizes, offering advocacy, networking, resources, discounts, visibility, and professional development to help businesses thrive in the state.



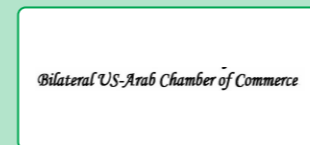
MEADOWLANDS CHAMBER OF COMMERCE (MCC)
The Meadowlands Chamber of Commerce (MCC) is a key organisation dedicated to fostering economic growth and development in the Meadowlands region, offering networking, advocacy, resources, visibility, and educational programmes for its members.



CHOOSE NEW JERSEY
Engaging with Choose New Jersey provides several benefits such as contributing to economic growth, valuable networking opportunities, and insights into economic trends and incentives.



SHRM – SOCIETY FOR HUMAN RESOURCE MANAGEMENT
SHRM membership benefits companies by enhancing HR practices, ensuring regulatory compliance, networking opportunities, and providing access to industry insights, all of which support organisational success.



PRESIDENT CIRCLE MEMBER - US ARAB BILATERAL CHAMBER OF COMMERCE
The US Arab Bilateral Chamber of Commerce fosters economic relations between the US and Arab countries, offering members market access, networking opportunities, business development support, advocacy, and valuable resources to enhance trade and investment.



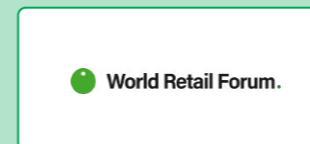
THE GREATER HOUSTON PARTNERSHIP
The Greater Houston Partnership provides members with networking opportunities, advocacy, business resources, and community engagement to support economic growth and success in Houston.



AUTISM SPEAKS - AUTISM SOCIETY OF AMERICA
Contributing to these organisations helps create a more inclusive and supportive environment for individuals with autism.



VICTORIAN CHAMBER OF COMMERCE AND INDUSTRY
The largest and most influential not-for-profit business organisation in Victoria, Australia, reaching over 100,000 businesses and individuals. Members enjoy a wide range of exclusive offers and discounts on various products and services.



WORLD RETAIL FORUM
The World Retail Forum is an international organisation created for the sole purpose of providing the tools, the know-how, best practices with retailers and grocers throughout the world. The Forum was created in partnership with global retailers, shopping centers, brands, investors, and architects.



BRITISH CHAMBER OF COMMERCE QATAR (BCCQ)
The British Chamber of Commerce in Qatar has been established as part of the rapidly expanding network of British business organisations dedicated to helping UK companies grow their business through Qatar.

2024 ESG HIGHLIGHTS

Lulu Retail has made solid progress on its sustainability journey this year. Highlights include:

FOSTERING ENVIRONMENTAL SUSTAINABILITY

4.03%

decrease in water intensity due to water conservation efforts

294k kg ↓

reduction of GHG emissions by contributing 103,145 litres of used cooking oil to produce 97,987.75 litres of biodiesel

31.8m



items collected via our reverse vending machines for recycling

398,643



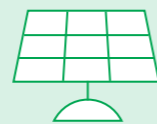
litres of UCO got recycled by third party

Awarded



ISO 14001 certification, highlighting our commitment towards environmental standards

69.1



tonnes of emissions avoided through the generation of 344,773 kWh from in-house solar panels in the UK

EMPOWERING PEOPLE AND COMMUNITIES

> 11%



increase in the number of female employees since 2023

1.2m



hours of training provided across Lulu Retail in 2024

82.1%



proportion of total procurement spent with local suppliers

389



own-brand organic products provided

USD 961,936

total funding for CSR initiatives

Launch



of new Learning Management System for training and development

Awarded



ISO 45001 certification, highlighting our commitment towards occupational health & safety

DRIVING ACCOUNTABILITY THROUGH GOVERNANCE

160k



hours of training on human rights

Zero



cases of bribery and/or corruption

Zero



incidents of data breaches, cyber-attacks or attempted cyber-attacks

Governance

leadership with a Chief Sustainability Officer and key ESG related policies

SUSTAINABILITY AT OUR CORE

The world is increasingly facing unprecedented social and environmental challenges. In this context, sustainability is no longer optional; it is vital for the long-term survival of any business. Only by reducing our carbon footprint, operating to the highest standards of ethical governance, and maintaining our social commitments can we embed resilience into our organisation and deliver positive impact to all our stakeholders and communities.



DRIVING SUSTAINABILITY FORWARD

At Lulu Retail, sustainability is embedded in all our operations. It guides the way we work and is a core part of our strategic planning and direction, driving our efforts to build a more sustainable future.

In 2021, we conducted a materiality assessment to identify and prioritise the most relevant issues for our business and mitigate against the key risks we face. Alongside this, we monitor and benchmark our ESG activities to help us continuously improve our performance.

ESG GOVERNANCE AND POLICY

Our behaviour as a company is guided by sound ESG principles. Oversight on key ESG matters and decisions is provided by our Board of Directors. At Group level, we have a dedicated Sustainability Department, led by the Chief Sustainability Officer (CSO) at the top and driven by the Sustainability Manager. Our CSO regularly reports to the Board on sustainability matters and initiatives.

The Sustainability Department is responsible for managing our impact on the economy, environment and people, supporting the work of our management team in incorporating sustainability factors in the company's strategic decision making. These are underpinned by our ESG Policy, introduced in 2023. The Policy defines what ESG means for Lulu Retail and establishes a robust framework for integrating sustainability throughout our group operations, embedding it as a key driver of our corporate strategy.

For us, environmental considerations encompass addressing climate change, conserving natural resources and minimising our environmental footprint. Social factors involve fostering inclusive workplaces, supporting local communities, upholding human rights and meeting our customers' expectations. Our commitment to good governance includes ensuring transparency, accountability and ethical decision making across our business.



“As we continue to integrate sustainability into our core operations, our commitment to ESG principles remains unwavering. We are dedicated to driving positive change, enhancing resource efficiency, and creating long-term value for our stakeholders through responsible and ethical practices.”

Ashraf Ali MA
Executive Director



KEY FOCUS AREAS IN OUR ESG POLICY TO ENHANCE POSITIVE IMPACT:



For more information, refer to our ESG policy [here](#).

SUSTAINABILITY CHAMPIONS

To promote sustainability across our organisation, we have created a dedicated team of Sustainability Champions. The team includes representatives from each of the 26 countries in which we operate. The Champions collate quantitative and qualitative data related to our sustainability efforts and report on sustainability topics for their respective regions to the group-level sustainability department. They also support the sustainability department in implementing and monitoring sustainability initiatives within their regions.



ENGAGING OUR STAKEHOLDERS

Lulu Retail’s stakeholders include customers, employees, suppliers, business partners, investors and the communities where we operate. Engaging with our stakeholders is important to us, and we encourage all our stakeholders to play an active role in defining and shaping our sustainability commitments.

Meaningful engagement is built on regular communication and fostering relationships. We provide several dedicated online and offline channels to facilitate regular communication with, and feedback from stakeholders.

This enables us to engage with our employees and stay connected with suppliers, customers, business partners and external communities, as well as ensure queries and concerns can be raised and swiftly addressed.

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 Press releases 	<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

PRIORITISING WHAT MATTERS MOST

Our sustainability reporting journey began in 2021, with the completion of our materiality assessment and the prioritising of the most important sustainability issues.

The results of the assessment were consistent with Lulu Retail's broader corporate strategies and mission, covering environmental stewardship, social responsibility and ethical governance. We remain committed to addressing our material ESG issues by continuously monitoring them and enhancing our positive impact.

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

LULU RETAIL'S MATERIALITY MATRIX









FOSTERING ENVIRONMENTAL SUSTAINABILITY

Environmental stewardship is a key priority for us. We are committed to protecting and preserving natural resources for the benefit of current and future generations. To achieve this, we place a special focus on efficient energy use, reducing emissions, waste management and water conservation.

HIGHLIGHTS

- Reduced 294,470 kg of GHG emissions by contributing 103,145 litres of used cooking oil to produce 97,987.75 litres of biodiesel
- 398,643 litres of UCO got recycled by third party
- Collected 31.8 millions plastic bottles and cans via RVMs for recycling
- 69.1 tonnes of emissions avoided through the generation of 344,773 kWh from in-house solar panels in the UK
- Received ISO 14001 certification in UAE, highlighting our dedication to environmental standards
- 4.03% reduction in water intensity due to water conservation efforts across various regions

MATERIAL TOPICS

Energy	
Climate Change	
Emissions	
Food Waste	
Packaging Waste	
Water & Effluents	

UN SDGS



STRENGTHENING ENVIRONMENTAL MANAGEMENT PRACTICES

Our sustainability initiatives are overseen by our management team, ensuring that environmental responsibility is integrated across our operations. This oversight provides robust assurance that we comply with all relevant laws and regulations as a company.

Central to this approach is the collection of data. We monitor and report on key environmental indicators including energy consumption, greenhouse gas (GHG) emissions, water use and waste generation and disposal. To help us remain agile and responsive, our Sustainability Champions continually help us to identify new and potential challenges, initiatives and improvements. We support our Champions with regular training sessions on emerging trends and best practices in reporting.

Our global operations enable us to create a positive impact in every country where we operate. We are committed to reducing emissions and waste through ambitious solar energy projects, enhancing energy efficiency, and promoting a circular economy.

While we previously held ISO 14001 certification only in Thailand, this year we have also achieved ISO 14001 certification in the UAE.

ACCELERATING ENERGY TRANSITION AND MITIGATING CLIMATE CHANGE

ENERGY

Global energy markets have become increasingly volatile and uncertain due to climate change and global events. As a result, energy security and efficiency have become more critical than ever. Lulu Retail is dedicated to enhancing energy efficiency across its operations and value chain while increasing the adoption of renewable energy within its activities.

To achieve this, we have introduced several initiatives aimed at minimising both the environmental and financial impacts of energy consumption. In Kuwait, Lulu Retail has implemented measures to optimise lighting, water, and electricity usage, along with improvements in fleet transport. In Lulu Retail Saudi Arabia, we have made a significant investment of SAR 3,218,030 to replace halogen lamps with LED lightings across the stores. In Qatar, Lulu Retail utilises advanced building management systems and energy optimisation software, such as Honeywell Forge - a cloud-based solution that enhances sustainability through data-driven insights and autonomous control. The system monitors and analyses near real-time conditions data, including factors like weather and occupancy levels at every site, to determine optimal values for chiller water temperature, pump speed, and fan speed in Air Handling Units. It also provides HVAC set point adjustment to maintain peak efficiency. Over the past 18 months, the use of Honeywell Forge Energy Optimisation has resulted in an average of 15% HVAC energy savings at the site.

In UAE, several outlets have met the requirements of the ISO 14001:2015 environment management standard. Three stores have already achieved the certification, while the process is ongoing for remaining outlets. This effort is supported by awareness programs that promote compliance with ISO 14001 requirements, including reducing energy consumption and enhancing energy efficiency.

Lulu Retail's renewable energy roadmap demonstrates a strong commitment to decarbonisation through the implementation of solar projects across various regions. These initiatives enhance environmental stewardship while delivering significant financial benefits, reinforcing the company's dedication to sustainable growth and operational efficiency.



PROJECT SPOTLIGHT

PATHWAY TO ZERO EMISSIONS: SOLAR ENERGY PROJECTS

In 2024, Lulu Retail made significant strides in its renewable energy initiatives, focusing on solar power projects across multiple regions. These projects not only contribute to our sustainability goals but also result in substantial cost savings.



Below is the 10-year projection of solar power generation and associated cost savings:

Lulu Hypermarket-Dubai South

- ⚡ Power Generation: 8,045,750 kWh
- 💰 Cost Savings: AED 1,520,647

Lulu Hypermarket-DIP

- ⚡ Power Generation: 8,277,750 kWh
- 💰 Cost Savings: AED 1,581,050

Lulu Hypermarket-Rashidiya

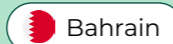
- ⚡ Power Generation: 7,468,676 kWh
- 💰 Cost Savings: AED 1,344,362

Lulu Central Logistics-DIP

- ⚡ Power Generation: 10,233,546 kWh
- 💰 Cost Savings: AED 1,954,607

Lulu Regional Office – Dubai

- ⚡ Power Generation: 2,155,373 kWh
- 💰 Cost Savings: AED 157,342



Sitra Site

- ⚡ Capacity: 1,039.55 kWp
- ✅ Status: Operational since October-end 2024

Riffa Site

- ⚡ Capacity: 1,150 kWp
- ✅ Status: Operational since December-end 2024



Riyadh Warehouse

- ⚡ Expected Power Generation in 1st year: 874,500 kWh
- 💰 Expected Cost Savings: SAR 36,116

- ✅ Status: Inspections completed

Solar installations are also planned for Dammam warehouse and 3 stores in the Eastern Province.



New Project

- ⚡ Capacity: 637,495 kWh per year
- ✅ Status: Operational since October 2024

Old Project

- ⚡ Capacity: 304.396 kWp
- ✅ Status: Operational

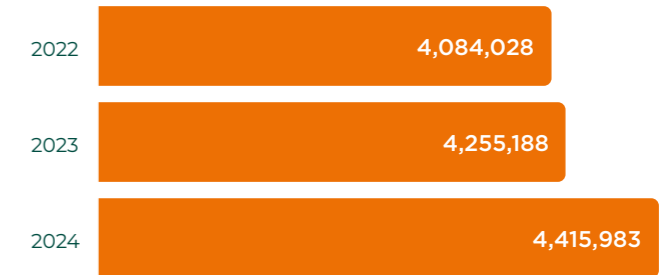
Total annual output from both the projects in 2024: 344,773 kWh

- 💰 Cost savings: £66,110
- 🌿 Emissions saved in 2024: 69.1 tonnes



In 2024, there was a slight increase in overall energy consumption by 3.78%. Lulu Retail's energy efficiency measures led to a 0.43% decrease in energy intensity, despite the company's growth and improvements in data monitoring systems.

TOTAL ENERGY CONSUMPTION (GJ)



ELECTRICITY CONSUMPTION (MWH)

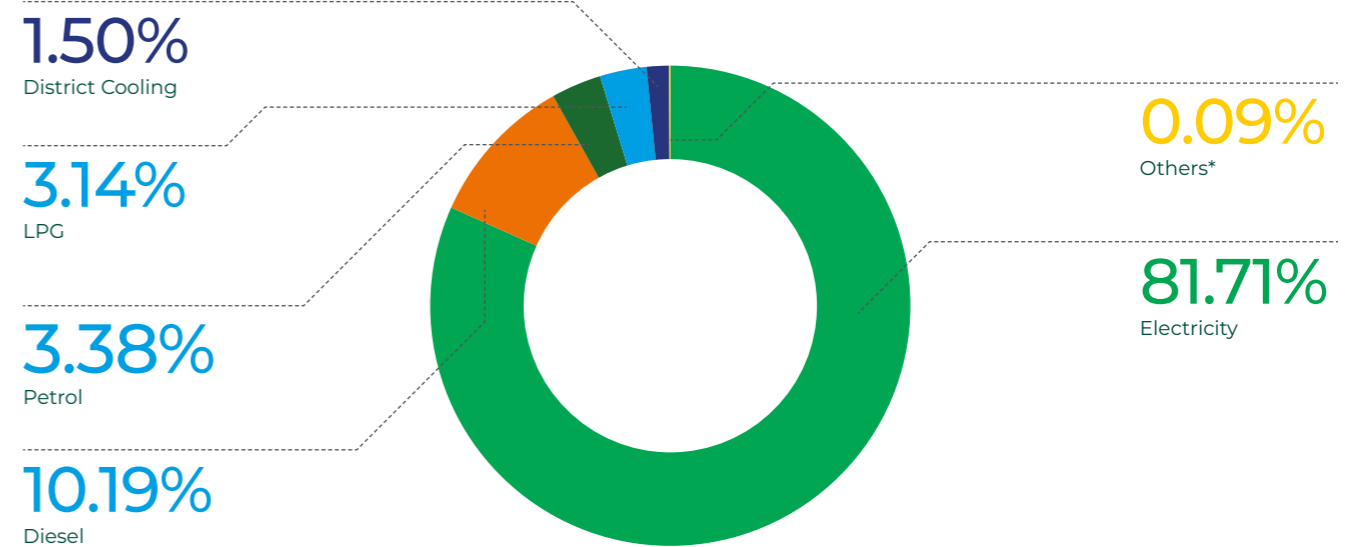


*Slight adjustment in 2023 figures due to enhanced reporting systems.

ENERGY INTENSITY (GJ/ SQ.FT.)



ENERGY USAGE BY ENERGY TYPE IN 2024 (%)



*Others include: Natural Gas, Gas Oil and CNG

CLIMATE ACTION

The effects of climate change are increasingly being seen, with rising temperatures and sea levels, and more extreme weather events impacting people, communities, nature and businesses around the world.

As an emissions-intensive business, Lulu Retail recognises its responsibility to take meaningful action to mitigate the effects of climate change. We are committed to UN Sustainable Development Goal 13, which calls for urgent action to combat climate change, and are taking several actions to reduce our carbon footprint. These include measuring and monitoring our Scope 1 and 2 emissions; and exploring mechanisms to tackle Scope 3, such as identifying priority emission categories and establishing monitoring and reporting systems for Scope 3 emission categories.

We are in the process of conducting climate scenario analysis to better understand and prepare for the potential impacts of climate change on our operations. This analysis is being conducted in accordance with global climate standards such as the International Financial Reporting Standards (IFRS S2), built on the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). By identifying climate risks and opportunities across the time horizons recommended by global best practices, we aim to assess and enhance our climate resilience.

However, we know that we cannot address these challenges alone and work closely with others in and beyond our sector, sharing knowledge and best practice with peers, industry associations and policymakers.

Lulu Retail measures and discloses GHG emissions in line with GHG Protocol guidance. Our reporting accounts for direct emissions from operations (Scope 1) and indirect emissions from purchased energy (Scope 2). The 2.25% increase in emission intensity is attributed to the enhancement of our data monitoring system and continuous business growth. Additionally, the emission figures for 2023 and 2022 have been slightly revised due to the change in GHG calculation methodology, which aligns with best practices and reflects improvements in our data monitoring systems.

CASE STUDY

LEASING VEHICLES IN A MORE SUSTAINABLE WAY

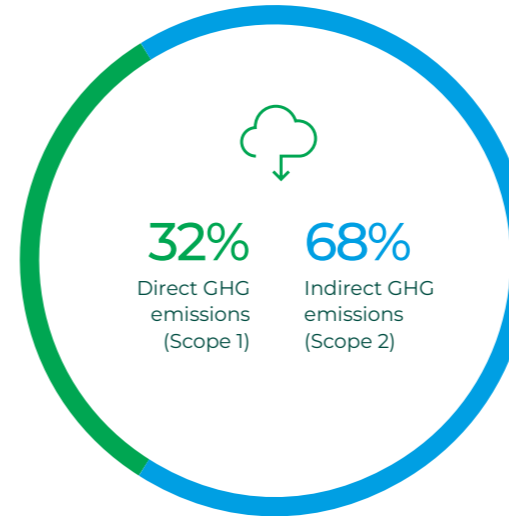
In 2024, Lulu Retail adopted a new leasing strategy for employees' company cars. Under the new leasing arrangements, we will switch to using newer company cars equipped with advanced technology that improves fuel efficiency and reduces the emissions from sources owned by the company.

This transition supports our goal of reducing GHG emissions and environmental footprint. The new vehicles will also feature the latest safety features, enhancing the protection of all our employees who need to travel on company business. The leasing arrangement will also free up financial resources that can be invested in other strategic initiatives.

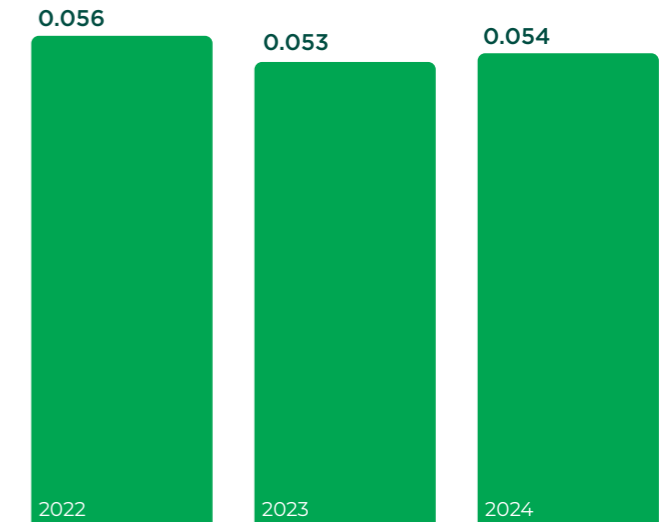
Following the introduction of this new arrangement, we are now exploring the feasibility of extending it to our commercial vehicles too.

KPI	UNIT	2022	2023	2024
Scope 1 GHG emissions	tCO ₂ e	243,826	220,711	246,567
Scope 2 GHG emissions	tCO ₂ e	482,054	500,544	522,112
Total GHG emissions	tCO ₂ e	725,880	721,255	768,679
GHG emissions intensity	tCO ₂ e/retail space sq. ft.	0.056	0.053	0.054

GHG EMISSIONS IN 2024 (TCO₂E)



GHG EMISSION INTENSITY (TCO₂E/RETAIL SPACE SQ. FT.)



CASE STUDY

RESTORING MANGROVE ECOSYSTEMS

Lulu Retail, together with Mastercard and Unilever, launched a new project in 2024 to restore mangroves in the UAE. The project aims to help combat climate change and protect valuable but fragile coastal ecosystems. This initiative also seeks to encourage and reward customers for making sustainable choices.

Mangrove ecosystems promote diversity, strengthen coastal areas against erosion, storms and rising sea levels, and help to remove carbon dioxide from the atmosphere by capturing it in the plants. However, in many cases, such ecosystems have become degraded or damaged. This project will help to restore this vital, and natural, defence.

Supporting this initiative, we are engaging with shoppers throughout our stores in the UAE and helping them find out about the project's benefits, with rewards for making sustainable choices in their shopping.



“We are honored to collaborate on the Mangrove Restoration Project with Unilever and Mastercard, a partnership that underscores our deep commitment to sustainability and community engagement. By leveraging our extensive retail network, we strive to inspire and reward our customers for embracing environmentally conscious choices, fostering a collective journey towards a greener future.”

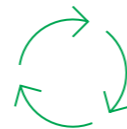
Mohamed Althaf
Group Director – Global Operations and Chief Sustainability Officer

CHAMPIONING CIRCULAR ECONOMY

The circular economy is a key part of creating a more sustainable society. As a major retailer, we have an important role in helping to develop such a system within our own value chain, through reducing, reusing and recycling existing materials. We have a variety of waste management initiatives at all our sites worldwide, waste-related activities are regularly monitored, and we provide training to employees on waste awareness and better waste management.

LULU RETAIL'S CIRCULARITY STRATEGY

As part of our commitment to fostering a sustainable future, we are taking action to advance the circular economy. Our strategy focuses on reducing waste, conserving resources, and promoting sustainable practices across our operations. Initiatives include:



REDUCING ELECTRONIC WASTE

Our electronics trade-in programme encourages customers to return their old devices in exchange for store credits or discounts on new purchases. Devices they bring in are sent for recycling or repurposing, helping to reduce electronic waste and contributing to a more sustainable lifecycle for electronics.



RECYCLING BOOKS

In 2024, we organised a books collection drive during the back-to-school season across our stores in the UAE. More than 60,000 textbooks were collected to prevent them from going to the landfill and creating a meaningful environmental impact. In total, 33.86 tonnes of books were recycled, helping us save approximately 111,738 kg of CO₂ emissions in UAE.



REVERSE VENDING MACHINE

Lulu Retail's Reverse Vending Machine (RVM) initiative has made remarkable progress in promoting recycling and sustainability. In 2023, the initiative successfully collected 4.9 million plastic bottles and cans for recycling. This impressive effort was significantly surpassed in 2024, with a staggering 31.8 million plastic bottles and cans collected. This substantial increase highlights Lulu Retail's commitment to environmental responsibility and its impactful role in reducing plastic waste.

PLASTIC BOTTLES AND CANS COLLECTED FOR RECYCLING VIA RVM



COOKING OIL INTO FUEL

We have implemented an initiative at most of our locations through which used cooking oil is collected and recycled to produce biodiesel. In Abu Dhabi, we have piloted a project in which the biodiesel produced in this way is used to fuel our transportation fleet – turning waste into a valuable resource and reducing our carbon footprint.



REDUCING TEXTILE WASTE

In UAE, under our uniform take-back programme, we collected used school uniforms, and recycled via a third party preventing textile waste from ending up in landfills.

OTHER CIRCULAR ECONOMY INITIATIVES

In addition to these programmes, we have implemented a number of other initiatives to promote the circular economy. We have introduced in-store refill stations for various items, enabling customers to reduce packaging waste by reusing containers, and increasingly use product packaging made from biodegradable or recyclable materials. In Dubai, we have gone beyond the minimum regulatory requirements by encouraging the use of reusable shopping bags and discontinuing single-use shopping bags well ahead of the official ban on single-use bans introduced in June of 2024.

DEVELOPING EXTENDED PRODUCER RESPONSIBILITY

Extended Producer Responsibility (EPR) is a strategy that holds producers accountable for the end-of-life management of their products. In UAE, we are collaborating with the Ministry of Climate Change and Environment (MOCCA), on issues around EPR and to launch a pilot project aimed at enhanced waste management framework.

In 2024, we implemented initiatives to reduce food waste and improve the management of other waste streams. Lulu Retail Kuwait provides employees with training on waste management practices. Additionally, the company is exploring ways to reduce consumption of packaging materials, containers, plastics and paper.

Lulu Retail Qatar works with multiple waste contractors and recyclers. Currently, approximately 75% of the waste generated is sent to landfill, while the remaining portion is recycled. We have set a target to reduce fresh food waste by 5% and closely monitor our progress through monthly analysis and reporting. To reduce packaging waste, we have switched to biodegradable containers made from sugar cane molasses and bamboo, and we are collaborating with suppliers to transition to

recyclable plastics. Plastic waste is separated where possible and sent for recycling or repurposed into trash bags for reuse in our operations. We also have in-house targets for reducing plastic waste. Other initiatives include reusing wooden pallets and recycling cardboard cartons. Additionally, we provide waste-reduction awareness programs for our employees.

In UAE, all packaged food that is consumable but may not be sellable for commercial reasons is sent to Emirates Red Crescent who supply it to people in need. We also partner with UAE Food Bank for similar initiative. We have a long-standing Reduce-Refuse-Reuse campaign for providing reusable plastic shopping bags, while cartons, metals, and other materials are all recycled.

Specific initiatives include targets for reducing paper usage and toner cartridges, reusing packaging cartons, recycling cooking oil waste, glass and metals, sending waste for conversion to energy, and composting green waste.

In the USA, Lulu Retail aims to achieve zero waste through a series of initiatives, including reducing resource consumption, optimising material use, and ensuring responsible waste disposal.



WASTE DATA*	UNIT	2023	2024
Total waste generated	Tons	132,946	134,754
Food waste recycled	Tons	5,546	3,850
Total waste recycled*	Tons	27,177	34,136
Waste reused	Tons	688	229
Waste sent to landfill	Tons	65,348	42,442
Used cooking oil	Liters	339,385	467,848
Recycled cooking oil	Liters	299,116	398,643

*We are currently establishing waste-related KPIs alongside enhancing our recycled waste reporting systems to improve data accuracy and tracking.

CASE STUDY

LULU RETAIL UAE'S BOOK COLLECTION DRIVE

In a commendable initiative aimed at promoting environmental sustainability, Lulu UAE launched a book collection and recycling campaign aimed at engaging school children and promoting eco-friendly practices. This case study outlines the campaign's key initiatives and outcomes, showcasing our dedication to reducing our carbon footprint and raising environmental awareness.

The campaign focused on recycling surplus books and paper to cut carbon emissions, conserve trees, and educate young minds on environmental responsibility. Over 60,000 books, weighing 33,860 kg, were collected across the UAE with the active involvement of school children. These books were sent for recycling, earning Lulu Retail UAE a Gold Certificate for Recycling from EnviroServe, a recognised recycling agency. This initiative not only helped in waste management but also educated the community about the importance of recycling and adopting sustainable practices.

The recycling process resulted in significant environmental benefits, including the reduction of 111,738 kg of CO₂ emissions, equivalent to conserving approximately 4,470 trees. Through this initiative, we successfully made a tangible impact on the environment while fostering greater awareness about sustainability within the community.

60k



Books collected

111,738kg



CO₂ emissions reduction

4,470



equivalent trees conserved

ADOPTING SUSTAINABLE WATER MANAGEMENT PRACTICE

WATER AND EFFLUENTS

With water scarcity an increasing global challenge, the conservation and responsible use of water is of growing importance. This is particularly relevant for Lulu Retail, as most of our operations are based in arid or desert regions. We are committed to implementing effective water management practices across all our sites.

Water is used for many purposes in our operations, including food preparation, cleaning and sanitation. All the water we use is sourced from local authorities and municipalities and discharged through municipal drainage systems. We adhere to all local regulations and work hard to avoid contaminants in all fluid discharges, such as filtering wastewater from kitchens through grease interceptors.

We aim to reduce water consumption at source and use a range of equipment including aerators, sensors and water-efficient fittings to achieve this. We also regularly stress the importance of good water management practices to all our employees. For example, in Oman, we monitor water consumption from monthly meter readings, and a comparison sheet is prepared to analyse monthly usage. Total water consumption is regularly measured and monitored. In 2024, total water consumption across the organisation was 2,633,117 m³.

Some of our locations have implemented specific water management initiatives. Lulu Retail UK has installed waterless urinals, and Lulu Retail Qatar has set yearly targets for water consumption reduction by launching strategic initiatives such as fixing tap aerators and migrating to green label fixtures.

WATER INTENSITY (M³/SQ.FT.)



4.03%



decrease in water intensity in 2024, largely due to water conservation efforts across various regions despite business growth

INDICATOR	UNIT	2022	2023*	2024
Total Water Consumption	m ³	2,398,874	2,632,314	2,633,117
Water Intensity	m ³ /sq.ft.	0.187	0.194	0.186

*The 2023 figures have been slightly revised to reflect improvements in monitoring systems, ensuring greater accuracy and robustness.

EMPOWERING PEOPLE & COMMUNITIES

As part of Lulu Retail's aim to be a responsible corporate citizen, we are committed to positive engagement with all our stakeholders, especially the people we work with and the communities where we operate. For us, this is integral to our approach to sustainability. We focus on building social responsibility through promoting diversity and inclusion, fair labour practices and community engagement. Thereby generating lasting value for all our stakeholders and wider society.

HIGHLIGHTS

- > 11% increase in the number of female employees since 2023
- 1,206,405 hours of training provided across Lulu Retail in 2024
- 82.1% – proportion of total procurement spent on local suppliers
- Provided 389 own-brand organic products
- USD 961,936 total funding for CSR initiatives
- Received ISO 45001 certification showcasing our commitment towards employee health & safety
- Launch of new Learning Management System for training and development

MATERIAL TOPICS

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

UN SDGS



BUILDING A STRONG AND RESILIENT WORKFORCE

Our success as a company depends upon our workforce, so we strive to offer a working environment in which everyone feels comfortable, included and empowered to achieve their potential.

To help us achieve this, we have a comprehensive range of policies. At the centre are our Human Rights and Employee Wellbeing Policies, which set out our commitment to equal opportunities and fair treatment for everyone who works for and with us. These policies help us build a culture of respect and dignity throughout our operations, in which diversity and inclusion is valued and promoted. Additionally, we have a Code of Conduct that governs how work is carried out within our organisation. Adhering to these documents ensures that our working relationships continue to support a positive working environment aligned with our goals and values.

Upholding human rights is of the highest importance to our business. We have rigorous policies and procedures to prevent forced or compulsory labour. As well as our direct workforce, these policies also apply to more than 2,800 external workers who provide services such as cleaning, maintenance, security and transportation. Any instances of forced or compulsory labour are taken very seriously and dealt with swiftly by the company and relevant government authorities.

We began implementing SAP SuccessFactors at Lulu Retail. This system would enhance our recruitment process by automating job postings, candidate management and hiring workflows. It would also improve core HR functions by centralising employee data, streamlining HR processes and supporting real-time reporting for better decision making. These solutions help optimise efficiency, reduce administrative tasks, and improve employee experience.

In 2024, Lulu Retail's HR department faced notable challenges, primarily due to increased organisational demands. This required considerable effort to streamline HR data management and reporting. To address this, we focused on optimising our data management systems and automating reporting processes to ensure both accuracy and efficiency. The implementation of SAP SuccessFactors RMK and Employee Central was pivotal in centralizing

employee data and streamlining recruitment workflows. By leveraging technology and enhancing internal communication, we successfully managed the employee tranche for share subscriptions, ensuring a smooth process and aligning with the company's broader business objectives during this period of transition.



‘By leveraging technology and enhancing internal communication, we successfully managed the employee tranche for share subscriptions, ensuring a smooth process and aligning with the company’s broader business objectives during this period of transition.’

At Lulu Retail, we are dedicated to retaining our employees through a variety of supportive and engaging initiatives. We focus on hiring junior-level candidates and promoting from within, fostering a sense of belonging and career progression. We provide training programmes to enhance technical, and soft skills, ensuring employees are prepared for advancement.

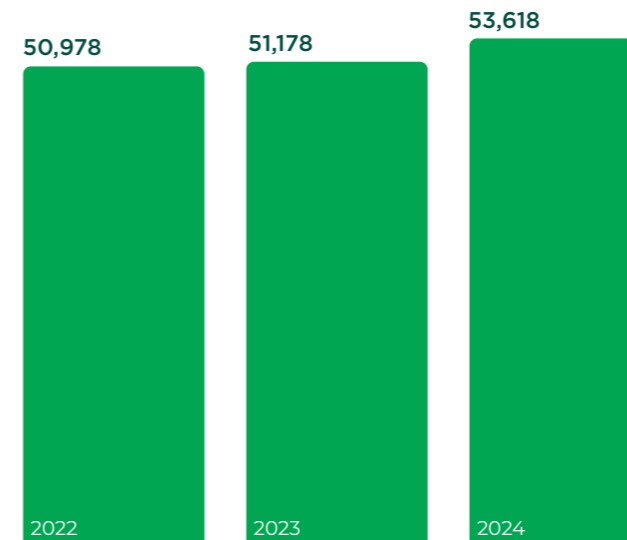
To strengthen the sense of community, we offer job opportunities to employees' immediate family members. We honor the dedication of our long-term employees and provide financial support to daughters' wedding of those with over 10 years of service. We ensure competitive compensation across all roles, offering health insurance, bonuses, retirement plans, and other incentives to motivate employees to excel. Additionally, we provide housing and vehicles depending on the employee's role and level.

We also promote a healthy lifestyle by offering health check-ups, fitness programs, and wellness workshops. Employees who need to relocate due to family-related concerns are supported by offering them job opportunities in their home countries, where we have operations. These initiatives ensure that Lulu Retail provides a supportive and enriching environment for all our employees.

In Saudi Arabia, we were honored to receive a prestigious award from the Ministry of Human Resources and Social Development's Mudad program, recognising our steadfast commitment to wage protection. This award reflects our dedication to ensuring fair and timely compensation for all employees, adhering to the highest standards of labour rights.

As a further endorsement of our efforts, the Ministry has generously granted us a complimentary subscription to the Mudad platform, enhancing our ability to maintain these principles. We remain committed to fostering a responsible and compliant work environment, upholding the values of fairness and integrity.

FULL-TIME EMPLOYEES



FULL TIME EMPLOYEES BREAKDOWN



INDICATOR	UNIT	2022	2023	2024
Total number of employees	#	50,978	51,178	53,618
By gender				
Female	#	7,479	8,560	9,514
Male	#	43,499	42,618	44,104
By age:				
18-25	#	14,575	14,163	12,536
26-35	#	23,073	23,173	25,101
36-55	#	12,852	13,472	15,482
55+	#	478	370	499

EMPLOYEE COUNT BY REGION

REGION	2022	2023	2024
Middle East	49,775	49,738	52,087
East & South Africa	49	37	35
Europe	112	106	94
North America	68	61	54
South Asia	705	933	1056
South East Asia	269	303	287
Oceania	0	0	5

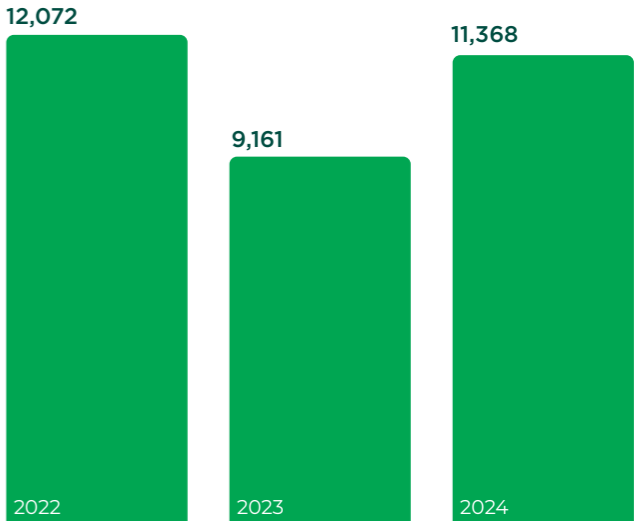


HIRING

Developing the next generation of employees is essential for business success. Lulu Retail is committed to attracting young talent across all the countries where we operate, with over 70% of our total global workforce being under the age of 35. At the same time, we take pride in our staff retention, with a significant portion of our employees having been with us for over six years, showcasing their dedication and our supportive work environment.

In 2024, the employee turnover rate was 18%. To ensure we learn and improve, we conduct thorough exit interviews when an employee leaves. Gathering feedback in this way provides valuable insights into how we can improve and develop the employee experience.

TOTAL NUMBER OF NEW EMPLOYEE HIRES



11,368



new hires in 2024

24.1%



increase in new hires in 2024 from the previous year

INDICATOR	UNIT	2022	2023	2024
Total number of new employee hires	#	12,072	9,161	11,368
By gender				
Female	#	2,624	2,439	3,164
Male	#	9,448	6,722	8,204
By age:				
18-25	#	7,274	5,433	6,135
26-35	#	4,184	3,192	4,453
36-55	#	607	528	776
55+	#	7	8	4

EMPLOYEE ENGAGEMENT

An engaged workforce is much more likely to be happy, productive and stable. We undertake a range of initiatives to engage with employees and develop a positive workplace culture and workplace loyalty. These include team celebrations, sports days and teambuilding activities.

Lulu Retail conducts sports activities such as football, badminton, chess and carrom, along with performance-enhancement programmes.

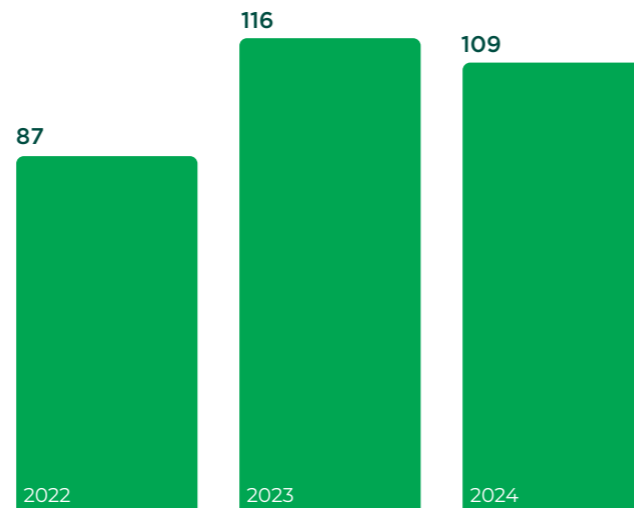
RECRUITMENT AND BENEFITS


Our recruitment strategy focuses on hiring junior and mid-level candidates, and providing attractive career progression opportunities, supporting the transition of capable employees into higher positions. We offer competitive remuneration, including benefits, and all employees undergo regular and comprehensive salary reviews. We also provide paid leave to all employees in line with local government regulations.

PARENTAL LEAVE

All Lulu Retail employees are entitled to parental benefits in line with the labour laws of their respective countries. In 2024, all employees who took parental leave subsequently returned to work at Lulu Retail.

TOTAL NUMBER OF FEMALE EMPLOYEES ENTITLED TO PARENTAL LEAVE



100% 

Retention rate after returning to work following a period of parental leave

INDICATOR	UNIT	2022	2023	2024
Total number of female employees entitled to maternity leave	#	87	116	109
Total number of female employees who took maternity leave	#	87	116	109
Total number of female employees who returned to work in the reporting period after maternity leave ended	#	87	116	109
Total number of female employees who returned to work after maternity leave ended and still employed 12 months after returning to work	#	69	116	109
Retention rate (total number of employees retained 12 months after returning to work following a period of parental leave / total number of employees returning from parental leave)	%	79	100	100

NATIONALISATION

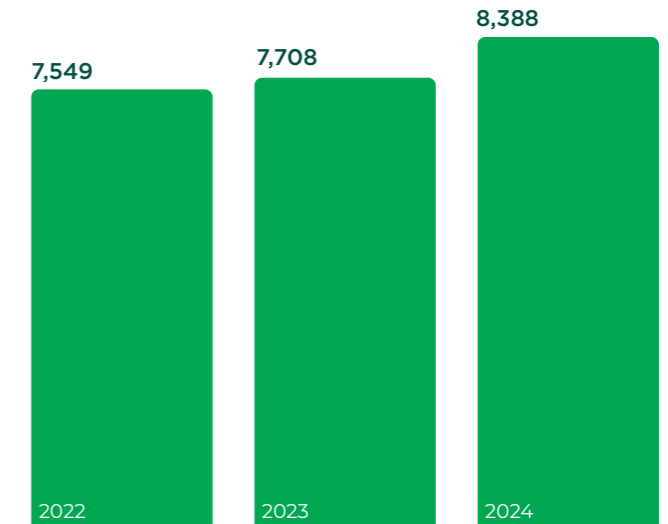
Lulu Retail has implemented several initiatives to foster the recruitment and retention of national employees, and especially young nationals. We are committed to supporting the recruitment and retention of national employees through a range of initiatives and programmes tailored to meet specific organisational and cultural contexts. These initiatives cover areas such as salary, career development, work-life balance, cultural sensitivity and inclusion, clear communication and feedback, community engagement and succession planning.

In Saudi Arabia, we were awarded by Al-Bir Charitable Society in recognition of our efforts in employing members of the local community. In Bahrain, we were awarded by the Ministry of Labour for being the number one recruiter of Bahraini nationals.

Lulu Retail Saudi Arabia has partnered with the Ministry of Human Resources and Social Development to advance the Saudi Vision 2030 objective of increasing national employment rates. Through a MoU, Lulu Retail has formalised its commitment to expanding employment opportunities for Saudi nationals across its operations in the Kingdom. We also received appreciation from the Riyadh Chamber of Commerce for supporting the localisation program, aligning with Saudi Vision 2030.

The number of full-time national employees at Lulu Retail increased from 7,708 in 2023 to 8,388 in 2024. This increase is a testament to our investment in the workforces of the regions we operate within.

NATIONALISATION



15.6% 

of the total workforce at Lulu Retail are made up of Nationals in the GCC



CHAMPIONING DIVERSITY, EQUITY, AND INCLUSION

Lulu Retail provides equal employment opportunities to all employees and job applicants regardless of race, colour, ancestry, national origin, gender, marital status, religion, age, or disability. We ensure equal opportunities throughout all employment stages, including hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, and training. Our salary structure is based solely on employees' roles.

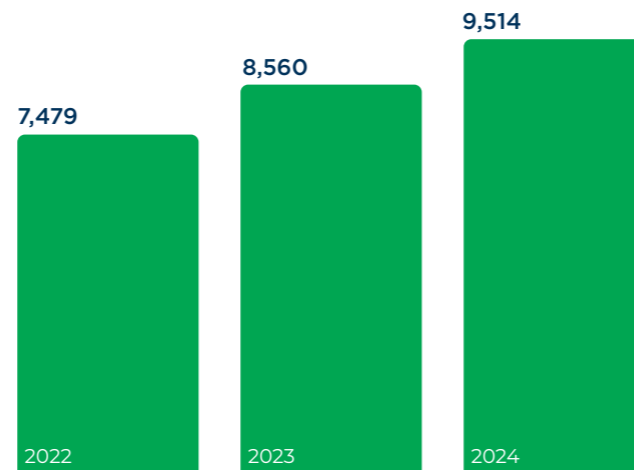
We are committed to enhancing workforce diversity through recruitment strategies and inclusive workplace practices. We generate awareness and educate employees on the importance of diversity and inclusion, recognise and address unconscious biases, and ensure everyone understands their role in fostering an inclusive workplace. Our awareness sessions also cover the process for reporting any instances of discrimination or harassment.

11.1%



increase in female employees in 2024

FEMALE FULL TIME EMPLOYEES



INDICATOR	UNIT	2022	2023	2024
Total Employees in Senior Management	#	76	14*	14
Total Employees in Middle Management	#	569	612	637
Female	#	20	18	17
Male	#	549	594	620
Total Employees in Staff	#	50,333	50,552	52,967
Female	#	7,459	8,542	9,497
Male	#	42,874	42,010	43,470

*Due to Group reorganisation and the reallocation of employee grades, the number of employees in senior management has been reduced.



FOCUS ON FEMALE TALENT

As part of our diversity efforts, we are committed to supporting female employees within our organisation. We provide guidance, support and career development opportunities to our employees, including female employees to advance their careers within our business. By recognising and valuing diverse perspectives, we aim to foster an environment in which women feel respected and heard.

Thanks to our inclusive initiatives, we have increased the percentage of our female workforce. The number of full-time female employees rose by 11.14% in 2024 and females now comprise 17.74% of our workforce.

We have a number of initiatives aimed at the recruitment and retention of female employees. Female employees receive guidance and support throughout their career journeys, while career advancement opportunities encourage them to pursue personal and professional growth within our organisation.

In the USA, the majority of our employees are women and minority groups, with 72% identifying as Hispanic, including individuals of Mexican, Puerto Rican, Cuban, Asian, and Central or South American origin.

SAFE AND INCLUSIVE WORK ENVIRONMENT

As part of our commitment to a safe and inclusive workplace for everyone, Lulu Retail operates a zero-tolerance approach to discrimination at workplace. This commitment is communicated to all employees as part of their onboarding process and reinforced through communications. Our Code of Conduct includes a statement of principles designed to ensure ethical behaviour in the workplace.

To ensure a safe and respectful environment, we want all employees to feel comfortable when raising concerns about behaviour without fear of reprisal. We have a strict policy of non-retaliation which applies to all employees. We provide multiple channels through which grievances and concerns can be raised, and all reports are treated with sensitivity. Information is dealt with in confidence and shared only with the necessary parties. This is in keeping with the principles of fairness and accountability and enables everyone in the Lulu Retail family to enjoy a safe and respectful workplace.

Lulu Retail protects all its employees from harassment and discrimination. To help ensure no inappropriate behavior, almost all work areas are monitored by CCTV cameras.

There were no incidents of discrimination reported in Lulu Retail in 2024.

CULTIVATING GROWTH AND PROFESSIONAL DEVELOPMENT

At Lulu Retail, we want all our employees to reach their full potential and embark on fulfilling careers. To support this goal, we have a Learning and Development department that oversees the design, implementation and evaluation of our numerous training initiatives.

Collaborating closely with subject-matter experts, the department plays a pivotal role in creating relevant and up-to-date training content. Additionally, we have forged partnerships with external training providers and educational institutions to offer specialised programmes that align with emerging skills requirements. This is supported through our Training and Development Framework, which ensures that employees benefit from learning opportunities tailored to enhance their career journeys and aspirations.

Training and skills programmes are offered across each area of the business and include instructor-led and on-the-job training, role-specific training, and skills-specific training such as teamwork, cultural sensitivity and leadership. Cross-sector training programmes equip employees with the skills needed to work in different roles or business areas.

In 2024, we launched our advanced Learning Management System (LMS). Accessible from personal devices and offering a modern and user-friendly interface, the LMS streamlines the process of accessing training modules, courses and resources. This centralised platform caters to individual learning needs, ensuring a seamless and personalised journey.

Our LMS offers a range of features designed to enhance the learning experience. Personalised learning paths provide tailored courses and materials to fit individual learning needs, supporting e-learning courses, documents, videos, surveys, and assignments with online, offline, or hybrid learning options. Interactive content engages users with videos, quizzes, and interactive modules. Progress tracking allows real-time monitoring of progress and achievements. With mobile access, learners can access the platform anytime, anywhere, from any device. The LMS also allows users to download the course and view them without the need of an internet connection. This list of features is not exhaustive, but it highlights the key functionalities that make our LMS a powerful tool for learning and development.

Across the year, we provided 1,206,405 hours of training and learning. Our average number of training hours per employee has increased year on year since 2021 and reached 22.5 in 2024.

22.5



average number of training hours per employee in 2024

SPECIFIC SKILLS TRAINING OFFERED AT LULU RETAIL

- Induction Training
- Retail Training (Basics, Intermediate, and Advanced)
- Health & Beauty Training
- Frozen Food Training
- Customer Service Training
- Housekeeping Supervisors Training
- POS Training
- Basic Food Hygiene
- Cashiers Training
- Supervisors Training
- Packers Training
- Assistant Managers Training
- Effective Communication Skills Training
- Basic Selling Skills Training
- Storekeepers Training
- Butchery Training
- Seafood Training
- Fruits & Vegetables Training
- Delicatessen Training
- Roastery Training
- BLSH/Perfume Training
- Bakery Training
- Hot food Training
- Trainers Training
- Security Training
- External Training (Department Store)
- Buyers Training
- Communication Skills Training for Managerial Level
- Leadership Training Programme
- On-the-Job Training

Health and Safety forms an important training module to ensure workplace safety. Training is offered in a diverse range of formats, including interactive workshops and seminars, online training, classroom sessions, onsite training, immersive cross-functional projects and academic-level programmes. Regular performance reviews, complemented by self-assessment and feedback from managers, identify any competency gaps or needs and enable the development of individualised training plans. We measure the success of our training through pre-training assessment and post-training evaluation. All employees are encouraged to provide feedback on their training experience to ensure continuous improvement.



ESG TRAINING AND COMMUNICATION

We are committed to providing comprehensive ESG training to our Sustainability Champions and all employees across the company. The newly launched LMS will be a great tool in this effort, offering a modern and user-friendly interface to streamline access to training modules, courses, and resources. We are also working with the training team to include a module on ESG in the LMS.

MONITORING EMPLOYEE TRAINING AND DEVELOPMENT

Lulu Retail's programmes are designed to meet or exceed industry standards. In Oman, we maintain ISO 21001 certification, demonstrating our commitment to high-quality training. We aim to seek further certifications across the organisation to strengthen the validation of our standards.

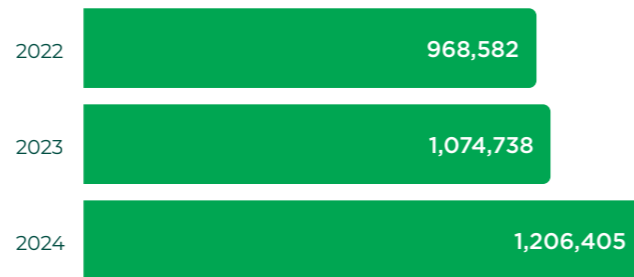
All employee training programmes are regularly reviewed and evaluated to ensure they remain effective and meet our needs. Employee feedback is an essential part of this process, and we conduct participant surveys, learning outcome assessments, and post-training performance evaluations. This helps ensure that our training programmes continue to meet the needs of the business and that individual employees feel involved in their career development.

To aid objective assessment, we collect information such as the number of training sessions conducted, participation rates, training hours, and areas of focus. This data is analysed to identify trends, opportunities for improvement, and any possible discrepancies. This also helps us allocate resources effectively across the

business and to develop transparent training reports that are shared with various stakeholder groups.

Our commitment to measuring and evaluating the effectiveness of our training programmes helps ensure that they remain relevant, impactful and significant contributors both to the professional growth of our employees and the success of our organisation.

TOTAL NUMBER OF TRAINING FOR TOTAL WORKFORCE



AVERAGE TRAINING HOURS PER EMPLOYEE



INDICATOR	UNIT	2022	2023	2024
Total number of training hours by gender:				
Total	Hours	968,582	1,074,738	1,206,405
Female	Hours	142,101	179,760	214,065
Male	Hours	826,481	894,978	992,340
Average hours of training per employee by gender:				
Average	Hours per number of total employees	19	21	22.5
Female	Hours per number of female employees	19	21	22.5
Male	Hours per number of male employees	19	21	22.5

ENSURING A SAFE AND HEALTHY WORKPLACE

The health and safety of our employees is Lulu Retail's highest priority. We adhere strictly to all relevant local health and safety requirements and our comprehensive Occupational Safety and Health (OSH) system manages risk and protects the health and safety of all employees, contractors, visitors and other parties. We offer employees in our Fresh Food Department regular medical check-ups complying with regulatory requirements.

We operate a hazard management system, which includes facility surveillance, and the provision of personal protective equipment (PPE) as required. We inspect all working areas on a regular basis. In Oman, inspections are complemented by an Emergency Response Team to provide additional protection to workers. In Kuwait, our systematic approach to managing hazards includes regular training to maintain and improve our safety systems, while in Abu Dhabi we adhere to the ADOSH SF v4.0 (the Abu Dhabi occupational safety and health system framework).

Regular training for all relevant employees plays an essential role in our commitment to health and safety. At Lulu Retail, we regularly review health and safety training and processes, ensuring continual improvement, and training is included in employees' onboarding and orientation. This ranges from fire warden training and fire and safety training in Oman to emergency situations training in Qatar.

In 2024, 159 work-related injuries were reported, an increase attributed to improvements in our reporting systems. There were no fatalities reported in 2024.

We review every incident in the workplace to identify the root cause and take appropriate preventive action. Awareness training is provided to employees and a hazard reporting mechanism enables all risks to be reported. We also provide emergency response training.

Lulu Retail Saudi Arabia is commended for its unwavering support of the Ministry of Health's initiatives, particularly during the challenging times of the COVID-19 pandemic and beyond. Since 2020, Lulu Retail has played a key role in promoting health and safety by actively participating in various Ministry of

Health (MoH) campaigns, including vaccination drives, awareness programmes, and safety measures across its stores. Lulu Retail's commitment to public health and its ongoing partnership with the MOH highlight its dedication to the well-being of the community. We recognise and appreciate Lulu Retail's efforts in supporting these crucial initiatives and contributing to a healthier, safer society.

OHS MANAGEMENT SYSTEM

Our OHS system sets the safety standards we expect across our operations. It is intended to provide universal health coverage for all employees, including access to essential healthcare services and necessary medications. Within each country where we operate, the OHS system is designed to comply with that country's standards and regulations. We frequently review the performance of our OHS system and implement new risk management strategies as appropriate.

Through training and communication, we make all employees aware of any risks related to their roles and provide clear instructions on the necessary precautions they are required to adopt. All employees are encouraged to be vigilant regarding health and safety and to report potential risks and hazards to their team leaders.

In UAE, we got certified with the ISO 45001 Occupational Health and Safety Management System. At our sites in the US and UK, we have dedicated Safety Committees. These meet regularly to identify and discuss health and safety related risks, with control measures implemented to ensure safe working environments are maintained.

DELIVERING EXCELLENCE TO CUSTOMERS

Lulu Retail is committed to promoting healthy and sustainable lifestyles for our customers. To support this, we provide high-quality, fresh and fairly priced food and other products, together with an enjoyable shopping experience built on delivering exceptional customer service.

Our product range is wide and varied and designed to meet the nutritional and dietary needs of all our customers wherever they are located. Understanding the health, safety and sustainability of our products is essential and we work closely with our suppliers to gather data around the ingredients, nutritional values and allergens of the food we sell.

We increasingly offer organic and locally sourced options for items such as fresh fruit, vegetables, meat and fish, which both supports local farmers and offers food with a lower environmental impact. We have also continued to expand our range of Private Label products. We have long been committed to offering products with reduced salt content and have since expanded our range to include lower-fat, sugar-free, gluten-free and reduced-sugar options.

Supporting these actions, we run consumer-facing campaigns highlighting the importance of healthy diets and nutrition. These are complemented by activities throughout the year, such as advertising and collaborations with social media influencers, to promote healthier eating habits.

In Saudi Arabia, Lulu Retail has strengthened commercial ties between Saudi Arabia and Brazil by signing a Memorandum of Understanding (MoU) with ApexBrasil, the Brazilian Trade and Investment Promotion Agency, during the visit of Brazil's Vice President. Through this partnership, Lulu Retail's extensive retail network will introduce a wider range of high-quality Brazilian products to Saudi consumers, showcasing Brazil's renowned agricultural excellence in grains, fruits, and meats. The MoU reflects Lulu Retail's commitment to enhancing access to diverse, high-quality products while fostering international trade relations. The signing ceremony, attended by high-level dignitaries, highlights the strategic importance of this collaboration in supporting economic growth and cultural exchange.

Marking the UAE's 53rd National Day, Lulu Retail and the Ministry of Industry and Advanced Technology signed a MoU to help promote locally made products. 'Made in the Emirates' will see our stores across the UAE promote items produced in the country. In stage one, accredited manufacturers will be invited to participate, while the second phase will see Lulu Retail support local producers to obtain the 'Made in the Emirates' quality mark. Our stores featured dedicated 'Made in the Emirates' shelves, with 53 products being promoted each week.

FOOD SAFETY

As a leading retailer in the pan-GCC region, Lulu Retail wants all our products to meet the highest standards for health, safety and quality. We adhere to the guidelines of all relevant regulatory bodies in the territories where we operate. In Qatar, for example, all products brought into the country are registered with the Ministry of Public Health and microbiological samples are sent for analysis in an ISO 17025-accredited laboratory at least three times a year.

We have clear procedures in place to ensure compliance with all legal and regulatory requirements. We hold ISO 22000 certification in all our GCC locations and HACCP standards accreditation in most of our GCC locations of operation. In addition, our Private Label Department is ISO 9001:2015 certified. The department operates a robust framework for vetting and selecting suppliers to ensure the integrity of our private-label products. This includes regular audits, comprehensive testing protocols and adherence to GSO standards. These measures enable us to improve the nutritional quality of our products, while transparent labelling helps customers to make healthier choices.

As part of our ISO 22000 and HACCP certification, we provide mandatory food safety training to employees across the organisation, ensuring employees remain up to date in international and industry-specific regulations and best practice.

Our dedicated team is responsible for the management and implementation of product safety and conducts health and safety impact assessments by evaluating product testing and feedback mechanisms. In the rare event of a non-compliance being identified, the issue is dealt with swiftly with thorough investigations to determine the cause and to prevent reoccurrence. Outcomes and corrective measures are communicated clearly to customers in line with our commitment to transparency.

Training is crucial to our success in maintaining high standards, so we conduct regular food safety training sessions across the organisation. These sessions ensure that our employees are up to date with relevant international and industry-specific regulations and best practice.

In 2024, we showcased our commitment to food safety and sustainability at the Abu Dhabi International Food Exhibition (ADIFE), where we demonstrated our latest advancements and shared best practices. Additionally, we presented our sustainability initiatives during a panel organised by the Abu Dhabi Investment Office (ADIO), highlighting our efforts to integrate sustainable practices across our operations. Our participation in these events underscores our proactive approach to food safety and sustainability, aligning with our broader ESG goals and commitment to positive community impact.

LULU RETAIL PRIVATE LABEL PRODUCTS

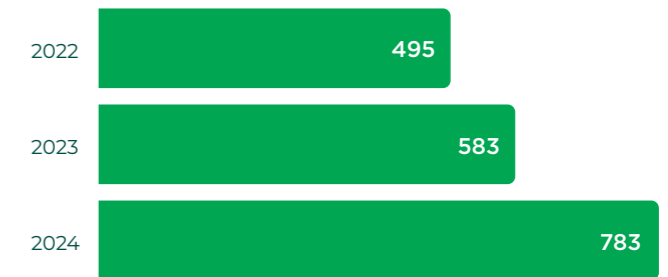
Our Private Label Department creates products tailored to our brand and customer preferences and available exclusively in Lulu Retail outlets.

The department achieved significant milestones in 2024, including the successful launch of new product lines with organic, sugar-free and gluten-free options, as well as introducing sustainable products that are eco-friendly and biodegradable. This was despite numerous challenges in the year such as supply chain disruptions resulting from political instability in the Middle East, marine channel disruption due to regional disputes, and fluctuations in commodity prices. To address these issues, we implemented proactive supplier diversification strategies, optimised inventory management systems, and improved vendor communication channels. These measures enabled us to maintain product availability, minimise disruptions, and uphold our commitment to quality and customer satisfaction.

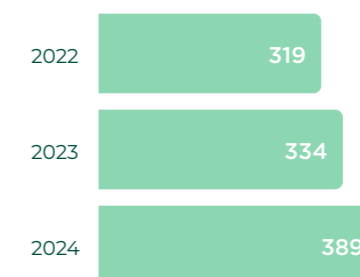
Our Private Label Department ensures transparency around product content, especially for substances with allergens, non-genetically modified organism (non-GMO), and other ingredients, through clear labelling, helping customers to make informed choices. This extends to clear disposal instructions and information about the environmental and social impacts of our products.

Within our private label line, product health and safety targets are set based on industry standards, GSO regulatory requirements, and internal quality benchmarks. The department also provides training to employees on the nutritional benefits and ingredients of our private label products, basic nutrition principles, and how to interpret nutritional labels. Employees are also trained to effectively communicate product benefits to customers and stay updated on new health trends and product lines.

OWN BRAND PRODUCTS SOLD WITH LESS SUGAR/SALT/SATURATED FATTY ACIDS/ FREE FROM ADDITIVES OFFERED



OWN BRAND ORGANIC PRODUCTS OFFERED



34.3%

increase in own brand healthy products in 2024 as compared to 2023

RESPONSIBLE LABELLING AND MARKETING

Lulu Retail is committed to ethical marketing and advertising, including transparency, honesty, and respect for consumer rights. We operate policies ensuring that all our promotional activities comply with applicable laws and regulations.

We prioritise transparency and customer trust in our marketing, with clear and detailed product labels showcasing the sourcing components, such as the origin of ingredients and relevant certifications. Our marketing campaigns emphasise our commitment to sustainability, ethical practices and social responsibility, ensuring customers are aware of the positive impact of their purchases.

CUSTOMER EXPERIENCE

Lulu Retail has procedures to ensure effective communication, satisfaction and customer retention. These include personalised interactions, feedback mechanisms, and continuous improvement to foster strong, lasting customer relationships.

Customer complaints are managed through a dedicated system providing customers with various channels such as feedback forms, emails and phone calls. Each complaint is carefully reviewed, investigated and addressed by trained personnel. Feedback and complaints are integral to continuous improvement efforts, and we prioritise resolutions that enhance customer satisfaction and inform future decision-making processes.

Our customer satisfaction surveys use multiple-choice questions, Likert scales, and open-ended inquiries, and measurement scales include satisfaction ratings and Net Promoter Score (NPS) ratings. The 2024 results showed an increase in overall satisfaction rates, with particularly positive feedback regarding product quality, customer service responsiveness and brand loyalty.

PROJECT SPOTLIGHT

LULU RETAIL HAPPINESS PROGRAMME

Lulu Retail has expanded its customer loyalty initiative to reward and engage loyal shoppers across the entire GCC region this year. Through this programme, customers earn points on every purchase, which can be redeemed for exclusive offers, discounts, and rewards. The programme provides personalised deals based on shopping habits, ensuring members receive benefits tailored to their preferences. In addition to regular rewards, the Lulu Retail Happiness Programme includes special promotions, seasonal bonuses, and surprises, offering a convenient and rewarding experience for frequent shoppers.

EMPOWERING COMMUNITIES

As a leading retailer, we recognise our responsibilities to the local communities in which we operate. Guided by our ESG Policy, we collaborate with non-profit organisations and charities on projects that reflect our core values.

Through these initiatives, we support a variety of programmes focusing on healthcare, education, and economic empowerment. These include providing Iftar meals during Ramadan, supporting local farmers, encouraging blood donations, ensuring food security, and participating in breast cancer awareness campaigns. We are particularly proud to support local entrepreneurs and SMEs and are open to ideas and initiatives from charitable and non-profit organisations seeking our support.

Corporate social responsibility (CSR) activities at Lulu Retail focus on region-specific projects that promote employee volunteering in support of local causes.



In the **UAE**, we partnered with the Abu Dhabi Blood Bank to host regular blood donation drives, engaging with more than 20,000 donors, 6,000 of whom were first-time donors. More than 30% of Lulu Retail employees in Abu Dhabi have become regular blood donors and we ran a similar campaign in Al Ain in 2024.

PARTNERSHIP ON NUTRITIONAL GRADING INITIATIVE

In the UAE, Lulu Retail partnered with a technical team representing six different government entities to work on the Abu Dhabi Nutri-Mark initiative. This initiative is aimed at grading food products based on their nutritional value, ranging from A to E, where A indicates a better nutritional composition and E indicates a less favourable one. The technical team comprised the Abu Dhabi Public Health Centre, Abu Dhabi Agriculture and Food Safety Authority, Abu

Dhabi Quality & Conformity Council, Department of Health, Department of Economic Development, and Abu Dhabi Early Childhood Authority.

Lulu Retail partnered with the Emirates Environmental Group (EEG) to conduct can collection drives at our stores in Al Qusais, Al Barsha and Dubai Silicon Oasis in 2024. The collection drive saw enthusiastic support and the collected cans were handed over to the EEG. We also sponsored and donated an amount of AED 250,000 to the International Food Safety Conference and AED 50,000 to Ramadan Iftar meals in UAE. Other initiatives include a sustainability-themed walkathon, blood donation campaign and the Clean up the World Campaign. We have also engaged in a sustainability programme with Unilever to support restoration of mangroves in the UAE.

We demonstrated our commitment to community support by donating AED 100,000 to the National Multiple Sclerosis Society (NMSS). This generous contribution will aid in advancing research and providing essential services to those affected by Multiple Sclerosis (MS).

Additionally, Lulu Retail partnered with the STEPPI mobile application to raise awareness about MS, leveraging the app's reach to educate the public and encourage community involvement.

Also we provided a number of initiatives to promote employees' and customers' wellbeing, including free medical checks, group fitness activities, awareness raising to support World Diabetes Day, and providing free yoga mats to celebrate World Yoga Day.



INDICATOR	UNIT	2022	2023	2024
Donations and Sponsorships	USD	1,799,433	2,269,756	961,936

*2023 figure for donations and sponsorships is restated due to more precise data collection systems.

 KSA

Lulu Retail celebrated Founding Day in **Saudi Arabia** with a three-kilometre walkathon, which also promoted sustainability themes. Organised in partnership with Al Khobar Municipality and the Ministry of Sport, the event drew enthusiastic participants, making it the biggest walkathon in Saudi Arabia to date. We support 'Purple Saturday' aiming to foster a more inclusive shopping environment for people with disabilities. Our volunteers support the annual Hajj pilgrimage every year.

We launched a campaign in conjunction with International Plastic Bag Free Day, focusing on replacing single-use plastic bags with reusable alternatives. On World Humanitarian Day, Lulu Retail in Saudi Arabia partnered with the Central Blood Bank to organize a blood donation camp. On World Mental Health Day, our stores organized a series of impactful activities aimed at promoting mental well-being among employees and shoppers.

 Oman

In Oman, we support a range of charities, including Dar Al Atta and Nida, which support people and families in need. We also support associations empowering female entrepreneurs by providing platforms to showcase their products, and host pop-up bazaars for local businesses, as well as providing a range of support for local SMEs. With the Ministry of Agriculture, we promote local farmers and co-ops, helping to promote their products and support sustainable agricultural practices.

These partnerships are some of the examples of our commitment to CSR and community betterment, highlighting our dedication to expanding our reach and making a meaningful difference in people's lives.

LULU RETAIL OMAN CONVOY OF GOODNESS DRIVE

During the holy month of Ramadan, we launched the Lulu Retail Convoy of Goodness drive. With a participation of 72 volunteers, we distributed 1,000 boxes of essential groceries to the needy families in Oman, reaching the remotest parts of the country.

 Qatar


In Qatar, World Environment Day was marked with tree planting as part of the Plant Ten Million Trees Initiative. We successfully completed our fifth annual 'Shop and Donate' campaign in Qatar, raising QR125,000 for the Qatar Cancer Society to support their Strides in Pink breast cancer awareness campaign. Other initiatives in Qatar included our Healthy Lunch Box event to promote healthy eating for the new school year, with nutritious meals served to 500 children alongside educational information on the benefits of good diet and nutrition.

In Qatar, we sponsored the Education Above All (EAA) Foundation's Goals4Good tournament at Doha College, bringing together over 30 schools for football and art competitions and raising funds to support global education projects for marginalised children. We donated QR 100,000 to the Qatar Society for Rehabilitation of Special Needs, which aims to rehabilitate individuals with special needs while fostering societal inclusion. We marked World Plastic Bags Free Day by encouraging reusable and biodegradable alternatives. In partnership with food delivery service Talabat, we provided more than 1,000 snack boxes and daily iftar meals to their riders.

 Kuwait

In Kuwait, we marked World Environment Day in June with activities promoting sustainable practices and raising awareness of pollution from plastics. Our hypermarket featured eco-friendlier alternatives such as bamboo-derived products, plastic-free items and reusable shopping bags, with information to help customers make more sustainable choices. In Kuwait, our Donate a Book, Earn Happiness initiative saw customers donate over 10,000 of pre-loved school textbooks for redistribution to students unable to access new copies, helping them continue their studies. We partnered with the AlSeef Hospital to host a cardiopulmonary resuscitation (CPR) community awareness programme around essential life-saving skills at our Salmiya outlet.

We also conduct drawing activities in schools to nurture pupils' creativity and supports the Kuwait Women's Empowerment Platform, participating in their seminars. In-store, we promote environmental awareness through an eco-friendly counter and offer free health and diabetes check-ups for the general public.

 Bahrain

In Bahrain, in partnership with the Royal Humanitarian Foundation, we provide donation points at all Lulu Retail check-outs for customers to donate to Palestinians suffering from the conflict in Gaza. We also worked with the Ministry of Islamic Affairs to provide in-store kiosks where people could donate their monthly zakat and, during the Onam celebrations, served traditional Sadhya feasts to more than 200 workers in labour camps.

CASE STUDY 

HELPING STUDENTS ACCESS ESSENTIAL BOOKS

In Kuwait, Lulu Retail's 'Donate a Book, Earn Happiness' campaign helped students access learning material and saving resources. Run to coincide with the back-to-school season in August and September, the campaign encouraged customers to donate pre-loved school textbooks for grades 1 to 12 at any Lulu Retail Hypermarket outlet in Kuwait. The books were then distributed to students, promoting reuse. This not only helped the students' education but also ensures a second life for the books, avoiding the need for new ones.

Through the scheme, more than 10,000 books were collected in 2024. Meanwhile, customers donating books received Lulu Retail Happiness Points, which they can redeem for in-store rewards and discounts – so everyone is a winner!

10,000 
books were collected in 2024

CASE STUDY 

LULU RETAIL OMAN WORLD MILK DAY

In collaboration with the Al-Huda Rehabilitation Centre and Almarai, Lulu Retail participated in a World Milk Day event in 2024. The event promoted the nutritional benefits of milk while creating an inclusive and enjoyable experience for specially abled children.

The event focused on fostering inclusivity and raising awareness about milk's role in a healthy diet. It also addressed the challenge of making activities accessible and engaging for children with varying abilities.

The one-day celebration saw children participate in fun games, face painting, and puzzle-solving activities, creating lasting memories. Over 100 specially abled children and their families participated, fostering creativity, teamwork and an awareness of milk's benefits.

The event demonstrated Lulu Retail Hypermarket's dedication to inclusivity and promoting health awareness, and we now plan to host further similar events in the future.



CASE STUDY

LULU RETAIL WALKATHON 2024 – PROMOTING SUSTAINABILITY IN THE UAE

The eight edition of the Lulu Retail Walkathon was held successfully in 2024. This annual event, which we are proud to sponsor, raises awareness about sustainability and environmental conservation, empowers and encourages the community to take part in health and fitness activities, and promotes the circular economy.

The 2024 event saw a record turnout of more than 15,000 participants, including employees, customers and community members from across the UAE. Activities such as recycling workshops promoted the environmental theme, and the event featured a range of reused materials such as cardboard rolls, used bottles, showcasing circular economy principles. Health and wellbeing were also prominent, with activities including Zumba sessions.

Thanks to the enthusiasm and engagement of so many people, the walk fostered a strong sense of community and shared purpose.



“This Walkathon underscores our unwavering commitment to sustainability by actively involving both the community and our employees. It showcases how collective efforts can drive significant environmental impact and foster a culture of health and wellness.”

Nandakumar Vijayan
Director – Marketing and Communications

CASE STUDY

UNIFORM TAKE-BACK PROGRAMME

Lulu Retail's Uniform Take-Back Programme promotes environmental sustainability and community engagement across the UAE by collecting used school uniforms, thereby reducing the amount of textile waste sent to landfills.

After being successfully trialled in Lulu Retail Al Qusais, the programme was launched on World Environment Day, 5 June 2024, in 16 other stores across the UAE.

As well as diverting waste from landfill, the programme also promotes environmental awareness through both in-store and social media messaging.

So far, we have already prevented a large volume, more than a ton, of textile waste from going into landfills and the initiative has received external recognition with the award of a recycling certificate by Recycle Right LLC.



“The Uniform Take-Back Program is a significant milestone in our journey towards environmental sustainability and community engagement. By implementing this initiative to 17 stores across the UAE, we successfully reduced textile waste and promoted responsible consumption. Launching this program on World Environment Day underscored our dedication to preserving our planet for future generations.”

Salim MA
Group Director – Global Operations

DRIVING ACCOUNTABILITY THROUGH 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

- 160,854 hours of training on human rights
- Zero cases of bribery and/or corruption
- Zero incidents of data breaches, cyber-attacks or attempted cyber-attacks
- Governance leadership with a Chief Sustainability Officer and key ESG related policies

MATERIAL TOPICS

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

UN SDGS



UPHOLDING RESPONSIBLE GOVERNANCE

Lulu Retail has a robust governance framework that guides our risk management and compliance across our operations. Our governance practices meet or exceed all legal and regulatory requirements, helping ensure our continuance as a leading global retail brand.

The Board of Directors ('the Board') is the highest governing body within Lulu Retail and is supported by our senior management team. Board members are selected according to their qualifications, expertise and alignment with the Group's mission and values, with the selection process guided by recommendations from the shareholders.

NO	NAME	POSITION
1	 Yusuffali Musaliam Veettil Abdul Kader	Chairman
2	 Saifuddin Taher Bhai Rupawala	Chief Executive Officer & Executive Director
3	 Ashraf Ali MA	Executive Director-- Global Operations
4	 Abdul Saleem Valiyakath Ibrahim Kutty	Chief Operating & Strategy Officer / Executive Director
5	 Gil Adoteye Adotevi-Akue	Non-Executive Director
6	 Salmeen Obaid Suwaid Alsembari Al Ameri	Non-Executive Director
7	 Abdulrahman Ibrahim Hamad Abaalkhail	Independent Non-Executive Director
8	 André G. Sayegh	Independent Non-Executive Director
9	 Reed Hamad Khamis Al-Sheryani Al-Dhaheeri	Independent Non-Executive Director

BOARD COMMITTEES

The Board has an Audit Committee and a Nomination and Remuneration Committee (each of which will be subject to the composition requirements of the Governance Rules). If the need should arise, and subject to the Articles of Association, the Board may set up additional committees as appropriate. In accordance with the Governance Rules, the Chairperson is not permitted to be a member of either the Audit Committee or the Nomination and Remuneration Committee.

We are planning to establish a Sustainability, Strategy & Investment Committee to advance our commitment to sustainable growth and strategic innovation. This committee would aim to enhance our sustainability efforts, create long-term value for our stakeholders, and reinforce our leadership in sustainable business practices.

RISK MANAGEMENT

An essential part of building a sustainable, resilient business is the effective management of risk. Lulu Retail adheres to the highest standards of risk management, with clear, robust policies and procedures. We adopt an Enterprise Risk Management system, through which we have developed a risk register that includes ESG risks. We regularly assess and review key risks, including ESG-related risks, that could materially impact our business.

Our integrated approach to managing relevant ESG risks enhances our resilience, builds trust among stakeholders, and supports sustainable growth.

ESG-RELATED RISKS



ENVIRONMENTAL RISKS:

We aim to minimise our environmental impact through efficient resource management, managing climate change risks, and reducing carbon emissions.



SOCIAL RISKS:

We prioritise community engagement, ensure fair labour practices, and uphold ethical standards in our supply chain. Specific actions include positive community outreach, promoting a diverse and safe workplace, and monitoring supplier practices.



GOVERNANCE RISKS:

We aim to uphold high standards of ethical conduct at all times. We maintain robust risk oversight and ensure transparency through comprehensive ESG reporting. Our governance framework is overseen by the Board with clear reporting mechanisms to keep stakeholders informed.



FOSTERING A CULTURE OF ETHICS AND INTEGRITY

Lulu Retail has robust policies – in line with all applicable laws and regulations – that outline our commitment to incorporating ethical practices throughout our organisation.

These include an ESG Policy, an Anti-Bribery and Corruption Policy and Procedure, Supplier Code of Conduct, and our Employee Code of Conduct. These codes and policies are clearly communicated to employees, business partners and other relevant parties to ensure they are aligned with our values and objectives.

Our employee Code of Conduct and Business Ethics Policy sets clear expectations for behaviour across the organisation. All employees, including third parties who operate in a representative capacity, are required to follow the Code. The document is designed to promote integrity within our business, including business ethics, protecting the organisation's assets, data privacy and confidentiality, anti-bribery, anti-corruption and conflicts of interest.

Our Supplier Code of Conduct ensures ethical, sustainable, and responsible practices across our supply chain. It mandates fair labour standards, including the prohibition of forced and child labour, for which we have a zero-tolerance approach. The Code also reinforces non-discrimination, and safe working conditions and upholds ethical business practices, including anti-corruption and intellectual property protection.

We have a zero-tolerance approach to corruption. In some areas of operation, Lulu Retail has implemented corruption risk assessment processes, which include the evaluation of all operations, mandates, functions, and stakeholders for possible involvement in corrupt schemes. There have been no instances of corruption within our organisation in the past three years of reporting.

OTHER POLICIES IN OPERATION INCLUDE:

- Insider Trading Policy
- Related Party Transactions Policy
- Anti-Money Laundering (AML) and Sanctions Policy and Procedure
- Whistleblowing Policy and Procedure
- Board Remuneration Policy

CONFLICTS OF INTEREST

Lulu Retail is committed to always operating with ethical business practices. We are vigilant in all matters concerning conflicts of interest, whether financial or personal, and encourage our stakeholders to disclose any situations where such conflicts could arise. Should they arise, such concerns are overseen and managed by the Board. No critical concerns were reported in 2024.



ESG GOVERNANCE: BOARD AND SENIOR MANAGEMENT OVERSIGHT ON ESG



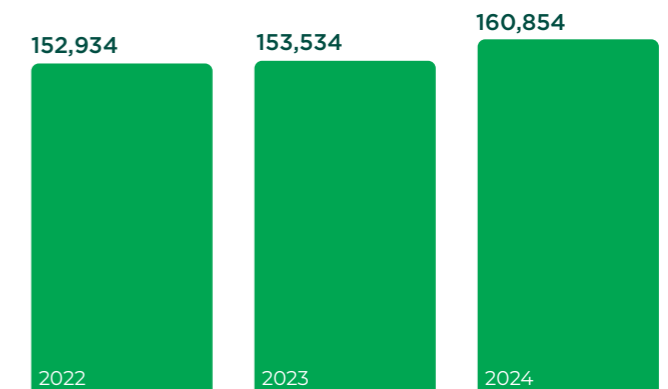
HUMAN RIGHTS

We aim to ensure that human rights are upheld throughout all our activities and operations. We adhere to all relevant laws in our countries of operation, and we are proud to use our influence and capabilities to support people and communities in the areas in which we operate.

Our robust Human Rights Policy has been developed in line with international human rights principles and aligns with the UN Global Compact and UN Guiding Principles on Business and Human Rights. It ensures we respect the fundamental rights and freedoms of individuals and outlines our commitment to providing equal opportunities, preventing discrimination, and fostering a safe and respectful work culture.

This Policy applies to our entire group-level operations at all locations in which we operate. Our employees are given training on human rights to ensure the strictest compliance. In 2024, we provided 160,854 training hours on human rights, an increase on each of the previous two years.

EMPLOYEE TRAINING HOURS ON HUMAN RIGHTS (HOURS)



160k+



number of hours training on human rights

INDICATOR	UNIT	2022	2023	2024
Corruption incidents	#	0	0	0
Percentage of operations assessed for risks related to corruption	%	100	100	100

BUILDING A RESPONSIBLE AND RESILIENT SUPPLY CHAIN

As a global retailer, Lulu Retail has long and often complex supply chains. Managing the social and environmental aspects of those supply chains is an important part of our sustainability efforts, and a keyway in which we can use our influence to drive positive change within our industry.

At the heart of this is our Supplier Code of Conduct, introduced in 2023. The Code sets out what we expect from suppliers in labour practices, ethical business, environmental stewardship, sustainable sourcing, monitoring and enforcement, and communication and reporting. It covers all stakeholders in our supply chain, including suppliers, subcontractors, other intermediaries and their employees. We ensure that all relevant parties are aware of the Code and that non-compliance is not accepted. Where non-compliance does occur, we have effective procedures to address such incidents, including corrective actions, termination of contracts, and legal remedies, depending on the severity and recurrence of violations.

To support the communities where we operate, and to reduce GHG emissions, we promote the sourcing of goods from local suppliers and producers. We also invest in supplier development and training to help local suppliers raise their standards in terms of quality, health and environmental performance. We intend to screen all new suppliers using environmental and social criteria to ensure alignment with our sustainability goals.

Lulu Retail in UAE conducted thorough evaluations based on quality, reliability, demand and compliance with local and international regulations, held regular performance reviews and strategic planning sessions with suppliers, and utilised supply chain management software to streamline operations and improve supplier communication. We also participate in the UAE In-country Value (ICV) programme, increasing procurement from UAE-based suppliers.

A number of actions were taken in the year to mitigate negative impacts in the supply chain, including regular meetings with suppliers, supporting suppliers to adopt environmentally friendly initiatives, and maintaining fair payment policies for timely payments to suppliers to help their financial security.

In Spain, we buy from growers and certified suppliers who use sustainable farming and production techniques, and we are working with our third-party logistics partner to incorporate recycling and reduce wastage throughout the supply chain.

82.1%



of Lulu Retail's total procurement spending was on local suppliers in 2024

We aim to work with suppliers who ensure the delivery of high-quality products while conforming with our commitment to sustainability. We encourage all our suppliers to follow ethical business practices and maintain open dialogue with suppliers to help them achieve this.

PROCUREMENT SPENDING ON LOCAL SUPPLIERS (MILLION USD)



*2023 figure for procurement spending on local suppliers is restated due to more precise data collection systems.

CASE STUDY

SAUDI ARABIA HARVEST SEASON

The Saudi Harvest Season campaign, organised by the Ministry of Environment, Water, and Agriculture (MEWA), aims to promote local agricultural products, particularly fruits and vegetables. The initiative emphasises the importance of supporting domestic farmers, ensuring food security, and encouraging sustainable agricultural practices. Through this campaign, retailers like Lulu Retail play a key role in showcasing fresh, locally grown produce, strengthening the connection between farmers and consumers, and raising awareness of the benefits of choosing homegrown products.

Integrating sustainability into our growth strategy in the GCC is a core focus, directly supervised by our Board. This governance ensures that our dedication to sustainable practices is more than a business objective; it is a fundamental value that shapes decisions to protect the environment, support local communities, and foster long-term economic growth in the region.

SPENDING ON LOCAL SUPPLIERS(%)



SAFEGUARDING CUSTOMER PRIVACY AND DATA SECURITY

Lulu Retail upholds the highest standards of data privacy and security, in doing so, we protect ourselves against security breaches and reputational damage, and maintain the trust of our stakeholders.

Our comprehensive Privacy Policy sets out how we collect, use, share and protect personal data, as well as users' rights and access to information. The document also details our communications Opt-Out Policy, outlines our limitations of liability, and provides information on how to contact the company and lodge a complaint.

Our IT department oversees data privacy and security management issues, as well as developing, implementing, and maintaining information systems along with all the hardware, software and networks that are essential for the company's day-to-day operations. The department provides regular data security training and awareness sessions for our employees, reinforcing understanding of the need for a secure work environment. Sessions are held both face-to-face and online, supported by regular newsletters covering relevant issues. We use security measures to protect data. Employees need to follow authentication and password guidelines.

A significant volume of our business is through ecommerce and digital payments. Rigorous global and national security standards are in place throughout our operations to ensure customers' financial information is protected. These include regular internal and external audits, quarterly vulnerability assessments and maintaining Payment Card Industry Data Security Standard (PCI-DSS) v3.2.1 certification.

In 2024, our IT department successfully completed several key initiatives, including upgrading the Point-of-Sale application, expanding the implementation of our Loyalty programme, and separating the ERP system due to structural changes within the organisation. By working closely with the HR team to implement new systems and collaborating with the training team to launch our LMS platform, we significantly improved our operational efficiency and aligned with our strategic goals.

Zero

incidents of data breaches, losses, cyber-attacks or attempted cyber-attacks within Lulu Retail in 2024



APPENDICES



GRI STANDARDS CONTENT INDEX

Statement of use	Lulu Retail Holdings PLC has reported in accordance with the GRI Standards for the period 1st January 2024 to 31st December 2024
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	None

GRI Standard/ Other Source	Disclosure	Location	Omission		
			Requirement(s) Omitted	Reason	Explanation
General disclosures					
GRI 2: General Disclosures 2021	2-1 Organizational details	Page 9-11	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.		
	2-2 Entities included in the organization's sustainability reporting	Page 4			
	2-3 Reporting period, frequency and contact point	Page 4			
	2-4 Restatements of information	Page 55, 67			
	2-5 External assurance	Report not assured externally			
	2-6 Activities, value chain and other business relationships	Page 9			
	2-7 Employees	Page 41-45			
	2-8 Workers who are not employees	Page 40			
	2-9 Governance structure and composition	Page 62-63			
	2-10 Nomination and selection of the highest governance body	Page 62			
	2-11 Chair of the highest governance body	Page 62			
	2-12 Role of the highest governance body in overseeing the management of impacts	Page 62, 65			

2-13 Delegation of responsibility for managing impacts	Page 62, 65		
2-14 Role of the highest governance body in sustainability reporting	Page 62, 65		
2-15 Conflicts of interest	Page 64		
2-16 Communication of critical concerns	Page 64		
2-17 Collective knowledge of the highest governance body	Page 62-63		
2-18 Evaluation of the performance of the highest governance body	Not disclosed	Confidentiality constraints	
2-19 Remuneration policies	Page 64		
2-20 Process to determine remuneration	Forms a part of our 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	Page 5-8		
2-23 Policy commitments	Page 22, 47, 55, 64, 65, 68		
2-24 Embedding policy commitments	Page 22, 47, 55, 64, 65, 68		
2-25 Processes to remediate negative impacts	Page 47, 51-54		
2-26 Mechanisms for seeking advice and raising concerns	Page 23, 47, 64, 65		
2-27 Compliance with laws and regulations	Page 64		
2-28 Membership associations	Page 16, 17		
2-29 Approach to stakeholder engagement	Page 23		
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	Page 24, 25
	3-2 List of material topics	Page 24, 25

Procurement

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 66
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Page 67

Business Ethics

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 64
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Page 64
	205-2 Communication and training about anti-corruption policies and procedures	Page 64
	205-3 Confirmed incidents of corruption and actions taken	Page 64

Energy

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 29		
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Page 31		
	302-2 Energy consumption outside of the organization	Not disclosed	Information unavailable/incomplete	Data is not monitored.
	302-3 Energy intensity	Page 31		
	302-4 Reduction of energy consumption	Page 31		
	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	Page 37
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GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Page 37		
	303-2 Management of water discharge-related impacts	Page 37		
	303-3 Water withdrawal	Not disclosed	Not applicable	We record water consumption based on the water supplied by third-party entities or municipalities in the respective regions, lacking details on the specified water sources for withdrawal.
	303-4 Water discharge	Not disclosed	Not applicable	Due to applicable provisions in the respective geographies of operation, we do not have ability to collect and report data on water discharge.
	303-5 Water consumption	Page 37		

Climate Change/Emissions

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 32		
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Page 32		
	305-2 Energy indirect (Scope 2) GHG emissions	Page 32		
	305-3 Other indirect (Scope 3) GHG emissions	Not disclosed	Information unavailable/incomplete	Data is monitored but requires further analysis.
	305-4 GHG emissions intensity	Page 32		
	305-5 Reduction of GHG emissions	Page 32		
	305-6 Emissions of ozone-depleting substances (ODS)	Not disclosed	Information unavailable/incomplete	Data is not monitored.
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Not disclosed	Information unavailable/incomplete	Data is not monitored.

Food Waste

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 34, 35
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Page 36
	306-2 Management of significant waste-related impacts	Page 36
	306-3 Waste generated	Page 36
	306-4 Waste diverted from disposal	Page 36
	306-5 Waste directed to disposal	Page 36

Packaging Waste

GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Page 34, 35
	306-2 Management of significant waste-related impacts	Page 36
	306-3 Waste generated	Page 36
	306-4 Waste diverted from disposal	Page 36
	306-5 Waste directed to disposal	Page 36

Employment

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 40, 41
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Page 43
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Page 44
	401-3 Parental leave	Page 44

Health and Safety

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 51
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GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Page 51		
	403-2 Hazard identification, risk assessment, and incident investigation	Page 51		
	403-3 Occupational health services	Page 51		
	403-4 Worker participation, consultation, and communication on occupational health and safety	Page 51		
	403-5 Worker training on occupational health and safety	Page 51		
	403-6 Promotion of worker health	Page 51		
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Not disclosed	Information unavailable/incomplete	The data measurement systems at the Group level are currently being established.
	403-8 Workers covered by an occupational health and safety management system	Page 51		
	403-9 Work-related injuries	Page 51		
	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

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 48-50	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Page 50	
	404-2 Programs for upgrading employee skills and transition assistance programs	Page 48-50	
	404-3 Percentage of employees receiving regular performance and career development reviews	Not disclosed	Information unavailable/incomplete

Workforce Empowerment

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 40-45		
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Page 46, 62		
	405-2 Ratio of basic salary and remuneration of women to men	Not disclosed	Confidentiality constraints	Information cannot be disclosed due to restrictions from internal policies.

Non-discrimination

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 47		
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Page 47		

Local Communities

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 55, 56		
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Page 55-59		
	413-2 Operations with significant actual and potential negative impacts on local communities	Page 55, 56		

Healthy and High-Quality Products

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 52-54		
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Page 52-54		
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Page 52-54		

Marketing and Labeling

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 53, 54		
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GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	Page 53, 54		
	417-2 Incidents of non-compliance concerning product and service information and labeling	Page 53, 54		
	417-3 Incidents of non-compliance concerning marketing communications	Page 53, 54		

Data Privacy and Security

GRI 3: Material Topics 2021	3-3 Management of material topics	Page 68		
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Page 68		

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	Page 65		
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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 31 ESG indicators that are considered essential to report in alignment with the recommendations of the Sustainable Stock Exchanges (SSE) Initiative and the World Federation of Exchanges (WFE).

ESG Metric	Calculation	Corresponding GRI Standard	Corresponding SDG	Corresponding Page Number / Direct Answer	Omission, if any - Reason & Explanation
E1. GHG Emissions	E1.1) Total amount in CO2 equivalents, for Scope 1	GRI 305: Emissions 2016	UN SDG 13	Page 32	
	E1.2) Total amount, in CO2 equivalents, for Scope 2 (if applicable)			Page 32	
	E1.3) Total amount, in CO2 equivalents, for Scope 3 (if applicable)				Data is not monitored.
E2. Emissions Intensity	E2.1) Total GHG emissions per output scaling factor	GRI 305: Emissions 2016	UN SDG 13	Page 32	
	E2.2) Total non-GHG emissions per output scaling factor				Data is not applicable.
E3. Energy Usage	E3.1) Total amount of energy directly consumed	GRI 302: Energy 2016	UN SDG 12	Page 31	
	E3.2) Total amount of energy indirectly consumed			Page 31	
E4. Energy Intensity	Total direct energy usage per output scaling factor	GRI 302: Energy 2016	UN SDG 12	Page 31	
E5. Energy Mix	Percentage: Energy usage by generation type	GRI 302: Energy 2016	UN SDG 7	Page 31	
E6. Water Usage	E6.1) Total amount of water consumed	GRI 303: Water and Effluents 2018	UN SDG 6	Page 37	
	E6.2) Total amount of water reclaimed				Data is not monitored.
E7. Environmental Operations	E7.1) Does your company follow a formal Environmental Policy? Yes/No	GRI 103: Management Approach 2016		Page 22	
	E7.2) Does your company follow specific waste, water, energy, and/or recycling policies? Yes/No		Page 22		
	E7.3) Does your company use a recognized energy management system?		Yes		




E8. Environmental Oversight	Does your Management Team oversee and/or manage sustainability issues? Yes/No	GRI 102: General Disclosures 2016		Yes	
E9. Environmental Oversight	Does your Board oversee and/or manage sustainability issues? Yes/No	GRI 102: General Disclosures 2016		Yes	
E10. Climate Risk Mitigation	Total amount invested, annually, in climate-related infrastructure, resilience, and product development		UN SDG 13		Data not available.
S1. CEO Pay Ratio	S1.1) Ratio: CEO total compensation to median FTE total compensation	GRI 102: General Disclosures 2016	UN SDG 10		Data not available.
	S1.2) Does your company report this metric in regulatory filings? Yes/No			No	
S2. Gender Pay Ratio	Ratio: Median male compensation to median female compensation	GRI 405: Diversity and Equal Opportunity 2016	UN SDG 5		Data not available.
S3. Employee Turnover	S3.1) Percentage: Year-over-year change for full-time employees	GRI 401: Employment 2016		Page 41	
	S3.2) Percentage: Year-over-year change for part-time employees			Data not available.	
	S3.3) Percentage: Year-over-year change for contractors/consultants			Data not available.	
S4. Gender Diversity	S4.1) Percentage: Total enterprise headcount held by men and women	GRI 102: General Disclosures 2016 GRI 405: Diversity and Equal Opportunity 2016	UN SDG 5	Page 41-42	
	S4.2) Percentage: Entry- and mid-level positions held by men and women			Page 46	
	S4.3) Percentage: Senior- and executive-level positions held by men and women			Page 46	
S5. Temporary Worker Ratio	S5.1) Percentage: Total enterprise headcount held by part-time employees	GRI 102: General Disclosures 2016		< 1%	
	S5.2) Percentage: Total enterprise headcount held by contractors and/or consultants			5.3% contractual employees	
S6. Non-Discrimination	Does your company follow a non-discrimination policy? Yes/No	GRI 103: Management Approach 2016	UN SDG 10	Page 47	
S7. Injury Rate	Percentage: Frequency of injury events relative to total workforce time	GRI 403: Occupational Health and Safety 2018	UN SDG 3		Data not available.

S8. Global Health & Safety	Does your company follow an occupational health and/or global health & safety policy? Yes/No	GRI 103: Management Approach 2016	UN SDG 3	Page 22
S9. Child & Forced Labour	S9.1) Does your company follow a child and/or forced labour policy? Yes/No	GRI 103: Management Approach 2016	UN SDG 8	Page 22
	S9.2) If yes, does your child and/or forced labour policy also cover suppliers and vendors? Yes/No			Page 64
S10. Human Rights	S10.1) Does your company follow a human rights policy? Yes/No	GRI 103: Management Approach 2016	UN SDG 10	Yes
	S10.2) If yes, does your human rights policy also cover suppliers and vendors? Yes/No			Yes
S11. Nationalization	Percentage of national employees		UN SDG 8	Page 45
S12. Community Investment	Amount invested in the community, as a percentage of company revenues.	GRI 413: Local Communities 2016	UN SDG 8	Page 55
G1. Board Diversity	G1.1) Percentage: Total board seats occupied by men and women	GRI 405: Diversity and Equal Opportunity 2016	UN SDG 5	Page 62
	G1.2) Percentage: Committee chairs occupied by men and women			50% board committee chairs occupied by a woman board member.
G2. Board Independence	G2.1) Does company prohibit CEO from serving as board chair? Yes/No			Yes
	G2.2) Percentage: Total board seats occupied by independent board members			Page 62
G3. Incentivized Pay	Are executives formally incentivized to perform on sustainability?			Data not available.
G4. Supplier Code of Conduct	G4.1) Are your vendors or suppliers required to follow a Code of Conduct? Yes/ No		UN SDG 12	Yes
	G4.2) If yes, what percentage of your suppliers have formally certified their compliance with the code?			Data not available.
G5. Ethics & Prevention of Corruption	G5.1) Does your company follow an Ethics and/or Prevention of Corruption policy? Yes/ No		UN SDG 16	Yes
	G5.2) If yes, what percentage of your workforce has formally certified its compliance with the policy?			100%

G6. Data Privacy	G6.1) Does your company follow a Data Privacy policy? Yes/No	Yes
	G6.2) Has your company taken steps to comply with GDPR rules? Yes/No	Yes
G7. ESG Reporting	Does your company publish a ESG Report? Yes/No	Yes
G8. Disclosure Practices	G8.1) Does your company provide sustainability data to ESG Reporting frameworks? Yes/No	Yes
	G8.2) Does your company focus on specific UN Sustainable Development Goals (SDGs)? Yes/No	Yes
	G8.3) Does your company set targets and report progress on the UN SDGs? Yes/No	Yes
G9. External Assurance	Are your sustainability disclosures assured or validated by a third-party audit firm? Yes/ No	No

ALIGNMENT WITH UN SDGS

UN SDG	GRI Standards Disclosure	Reference to Section(s)	Page Number(s)
SDG 2: Zero Hunger	 GRI 413-2	Empowering Communities	Page 55-59
SDG 3: Good Health and Wellbeing	GRI 305, 401, 403	Accelerating Energy Transition and Mitigating Climate Change	Page 29-33
		Ensuring a Safe and Healthy Workplace	Page 51
SDG 4: Quality Education	GRI 404	Cultivating Growth and Professional Development	Page 48-50
SDG 5: Gender Equality	GRI 401, 404, 406	Championing Diversity, Equity, and Inclusion	Page 46-47
		Fostering a Culture of Ethics and Integrity	Page 65
SDG 6: Clean Water and Sanitation	GRI 303	Adopting Sustainable Water Management Practice	Page 37
SDG 7: Affordable and Clean Energy	GRI 302	Accelerating Energy Transition and Mitigating Climate Change	Page 29-33
		Strengthening Environmental Management Practices	Page 28
SDG 8: Decent Work and Economic Growth	GRI 403, 404, 302, 401	Accelerating Energy Transition and Mitigating Climate Change	Page 31
		Building a Strong and Resilient Workforce	Page 43
		Cultivating Growth and Professional Development	Page 48-50
		Ensuring a Safe and Healthy Workplace	Page 51
SDG 12: Responsible Consumption and Production	GRI 302, 303, 305, 306	Accelerating Energy Transition and Mitigating Climate Change	Page 29-33
		Championing Circular Economy	Page 34-36
		Adopting Sustainable Water Management Practice	Page 37

SDG 13: Climate Action	 GRI 302, 305	Accelerating Energy Transition and Mitigating Climate Change	Page 29-33
SDG 14: Life Below Water	 GRI 305	Accelerating Energy Transition and Mitigating Climate Change	Page 29-33
SDG 15: Life on Land	 GRI 305	Accelerating Energy Transition and Mitigating Climate Change	Page 29-33
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	Upholding Responsible Governance	Page 62-63
		Building a Responsible and Resilient Supply Chain	Page 66-67
SDG 17: Partnerships for the Goals	N/A	Certification and Awards	Page 12-15
		Memberships of Associations	Page 16-17

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	195,543
Energy Management	Operational energy consumed	Gigajoules (GJ),		FB-FR-130a.1	Page 31
	Percentage renewable	Percentage (%)			More than 61% of electricity in UK is from renewable source
Food Waste Management	Amount of food waste generated	Metric tonnes (t)		FB-FR-150a.1	Page 36
	Percentage diverted from the waste stream	Percentage (%)			Page 35
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	Page 52-54
Product Labelling & Marketing	Number of incidents of non-compliance with industry or regulatory labelling or marketing codes	Number		FB-FR-270a.1	Page 53-54
Labour Practices	Percentage of active workforce employed under collective agreements	Percentage (%)		FB-FR-310a.2	Not applicable

Energy Management in Retail & Distribution	Total energy consumed	Gigajoules (GJ)	Consumer Goods - Multiline & Speciality Retailers Distributors	CG-MR-130a.1	Page 31
	Percentage grid electricity	Percentage (%)			Page 31
Workforce Diversity & Inclusion	Percentage of gender and racial/ethnic group representation for (1) management and (2) all other employees	Percentage (%)		CG-MR-330a.1	Page 46
Product Sourcing, Packaging & Marketing	Discussion of strategies to reduce the environmental impact of packaging	n/a		CG-MR-410a.3	Page 34-35
Management of Environmental & Social Impacts in the Supply Chain	Discussion of strategies to reduce the environmental impact of packaging	n/a	Consumer Goods - Multiline & Speciality Retailers Distributors	CG-MR-410a.3 FB-FR-430a.4	Page 34-35
Data Security	Description of approach to identifying and addressing data security risks	n/a	Food & Beverage - Food Retailers & Distributors	CG-MR-230a.1 FB-FR-230a.2	Page 68
	Number of data breaches	Number		CG-MR-230a.2 FB-FR-230a.1	0
	Percentage involving personally identifiable information (PII)	Percentage (%)			0
	Number of customers affected	Number			0

ABBREVIATIONS

ADIFE:	Abu Dhabi International Food Exhibition
ADIO:	Abu Dhabi Investment Office
ADAFSA:	Abu Dhabi Agriculture and Food Safety Authority
ADX:	Abu Dhabi Securities Exchange
AED:	United Arab Emirates Dirham
BCCQ:	British Chamber of Commerce Qatar
CEO:	Chief Executive Officer
CO₂:	Carbon Dioxide
CPR:	Cardiopulmonary Resuscitation
CSR:	Corporate Social Responsibility
CWEIC:	Commonwealth Enterprise and Investment Council
EAA:	Education Above All
EEG:	Emirates Environmental Group
ESG:	Environmental, Social and Governance
EPR:	Extended Producer Responsibility
GCC:	Gulf Cooperation Council
GHG:	Greenhouse Gas
GJ:	Gigajoules
GMO:	Genetically Modified Organism
GRI:	Global Reporting Initiative
GSAS:	Global Sustainability Assessment System
GSO:	GCC Standardisation Organisation

HACCP:	Hazard Analysis and Critical Control Points
HR:	Human Resources
HVAC:	Heating, Ventilation, and Air Conditioning
ICV:	In-country Value
IFRS	International Financial Reporting Standards
ISO:	International Organisation for Standardisation
ISCC:	International Sustainability and Carbon Certification
IT:	Information Technology
KPI:	Key Performance Indicator
KSA:	Kingdom of Saudi Arabia
kWh:	Kilowatt hours
LED:	Light-emitting Diode
LMS:	Learning Management System
MCC:	Meadowlands Chamber of Commerce
MEWA:	Ministry of Environment, Water, and Agriculture
MOCI:	Ministry of Commerce and Industry
MoH:	Ministry of Health
MS:	Multiple Sclerosis
MoU:	Memorandum of Understanding
MWh:	Megawatt hours
NMSS:	National Multiple Sclerosis Society

OSH:	Occupational Safety and Health
PCI-DSS:	Payment Card Industry Data Security Standard
PPE:	Personal Protective Equipment
QBA:	Qatari Businessmen Association
QBBF:	Qatar British Business Forum
RVM:	Reverse Vending Machine
SAR:	Saudi Riyal
SASB:	Sustainability Accounting Standards Board
SDGs/UN SDGs:	United Nations Sustainable Development Goals
TCFD:	Task Force on Climate-related Financial Disclosures
UAE:	United Arab Emirates
UCO:	Used Cooking Oil
UK:	United Kingdom
US:	United States
USD:	United States Dollar
WEF:	World Economic Forum
YMCA:	Young Men's Christian Association

