



The
Boots
Group



We have **health** at our **heart**

Environmental, Social and Governance
Technical Report 2025

Welcome

The Boots Group is built on a legacy spanning almost two centuries, during which we have been trusted by communities to connect people to healthcare and provide expert advice and products that help them live healthier lives.

Today, that commitment continues across 3,316* stores and online, supported by over 66,000 colleagues who serve millions of customers and patients every day — from our community pharmacies and optician practices to our beauty halls and digital platforms.

In This Report

Guided by a clear purpose — to support better health for people and the planet — we are expanding access to care, championing inclusion and advancing sustainability across everything we do.

The Boots Group publishes its Environmental, Social and Governance (ESG) disclosure in two documents:

- **The ESG Impact Report:** this brings our purpose to life, sharing the stories, partnerships and progress of our teams.
- **This ESG Technical Report:** this is the official record of our progress, charting our journey through the lens of data and governance. It contains our detailed performance data, management approaches and disclosures against GRI, SASB and TCFD standards.

The Boots Group Limited ('The Boots Group') is a private, standalone company and a leading health and beauty retailer. References in this ESG Technical Report 2025 to "the Company," "we," "us," or "our" refer to The Boots Group and its consolidated subsidiaries, and in each case do not include unconsolidated minority-owned entities. To read the stories and case studies that bring our purpose to life, please download the [ESG Impact Report 2025](#).

*Boots Opticians and other franchise locations excluded from total store number.



Download the ESG Impact Report 2025
Please visit [ESG Impact Report 2025](#) or scan the QR code.



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About This Report

GRI 2-2, 2-3, 2-5, 3-3

Welcome to our ESG Technical Report for The Boots Group, a definitive articulation of the progress we have made in FY2025 and our first report as a standalone company. This report is designed to chart our journey through the lens of data and governance. It provides a detailed and transparent account of our ESG strategy, management approaches, performance and the data that underpins our commitments

Reporting Period and Boundaries

The reporting period for this ESG Technical Report 2025 is 1 September 2024 to 31 August 2025, unless otherwise noted. Our fiscal year ends on 31 August and references herein to “FY2025,” “FY2024” and “FY2019” refer to our fiscal years ended on 31 August 2025, 31 August 2024 and 31 August 2019, respectively.

This report covers the performance and data for The Boots Group and its consolidated subsidiaries. This is our first report as a standalone, private company following our separation from Walgreens Boots Alliance, Inc. (WBA). All historical data has been restated where necessary to reflect our new corporate structure

Independent Assurance

The Boots Group is committed to transparent and credible reporting. To ensure the accuracy of our data, Deloitte LLP has performed a limited assurance engagement of specified ESG metrics within this report. Their complete and unaltered limited assurance statement, which outlines the scope and methodology of their review, can be found on pages 85-91.

Data Management and Presentation

We have a Company-wide approach to recording, measuring and reporting ESG performance, governed by a set of internal reporting criteria and key performance indicators. Across our businesses, data is collected by designated ESG leads and reviewed by functional and finance leaders to ensure accuracy and consistency.

Certain figures in this document may not sum due to rounding. In certain instances, values of 0.5% or less were rounded down to zero. Additionally, certain subtotals were rounded to ensure the aggregate amounts equalled 100%. When comparative data is presented, percentage increases above 200% and comparisons of positive figures against negative figures or vice versa are considered not meaningful (NM).

Forward-looking Statements

This ESG Technical Report 2025 contains forward-looking statements that are based on current expectations and assumptions and are not guarantees of future performance. These statements reflect our ambitions and goals and are subject to risks and uncertainties that could cause actual results to differ materially. These statements speak only as of the date they are made, and The Boots Group undertakes no obligation to update them.

This document has been prepared in accordance with the Global Reporting Initiative (GRI) Standards. It also includes disclosures aligned with the Sustainability Accounting Standards Board (SASB) and the Task Force on Climate-related Financial Disclosures (TCFD).

This ESG Technical Report 2025 also serves as our Communication on Progress as a participant of

the United Nations Global Compact (UNGC).

This report is the essential companion to our [2025 ESG Impact Report](#), which offers a narrative-led overview of our key stories and achievements.



Q&A with Ornella Barra

Chair of the Board of Directors and Chair of the ESG Committee

GRI 2-22, 3-3

Q: This is the first report for The Boots Group, what does it represent?

A: We are delighted to present our 2025 Environmental, Social and Governance (ESG) Report for The Boots Group. This milestone marks a new chapter in our legacy of trusted healthcare, pharmacy and retail leadership.

Today, as an independent company, we have the freedom and responsibility to shape what comes next. The world is rapidly changing and continues to face profound challenges and opportunities — climate change, widening health inequalities, technological advancements and socioeconomic shifts. These affect our customers, colleagues and communities every day and they demand bold action, therefore our commitment and responsibility to support the health and wellbeing of people and the planet is unwavering.

FY2025 was a year of transformation and progress. Supported by 66,000 colleagues across 3,316 stores, we delivered well over a billion customer and patient interactions, reaffirming our role as a trusted healthcare partner in every community we serve.

For us, ESG has always been a strategic priority, and our work continues to be guided by our four pillars — Healthy Communities, Healthy and Inclusive Workplace, Sustainable Marketplace and Healthy Planet — and in this report we reflect on our progress, and the continuing achievements of our passionate and dedicated teams.

Q: Let's start with Healthy Communities, this has always been central to your approach. What has been your main focus?

A: Our business is at the heart of community health, and we are delivering over a billion customer and patient interactions each year. In the

UK, through initiatives like Boots Online Doctor, Health MOT and NHS Pharmacy First, we are leveraging the power of technology to unlock our highly skilled pharmacists to offer more local care and advice to their patients. Simultaneously, we are offering even greater support to the NHS as part of the wider national healthcare system and in FY2025, we have provided more than 1.5 million consultations through Pharmacy First.

In line with our continued commitment to supporting the United Nations Sustainable Development Goals (SDGs), partnerships have always been critical to the delivery of our commitments. Through our continuing work with fantastic organisations like the European Organisation for Research and Treatment of Cancer (EORTC),



Q&A with Ornella Barra, Chair of the Board of Directors and Chair of the ESG Committee continued

Macmillan Cancer Support, Fundacion Alma, Irish Cancer Society and many more, over the last ten years we have given £53 million in community contributions, focusing on health, social welfare and education.

Q: You mentioned the commitment of your teams and their vital role in serving communities, how do you bring that same level of care to them?

A: Our people are our greatest strength, their talent, generosity and passion drive our business forward. Creating a workplace where our colleagues are safe, supported and enabled to develop is vital to the health of our organisation.

Colleague safety remains central to our strategy — we are investing in tackling retail crime with relationships across every police force in the UK and we've connected 100% of our stores to the Auror intelligence platform, reducing panic alarm activations by 11% in FY2025.

We are also developing the workforce of the future and, through our partnership with The King's Trust, have supported over 800 young people to date to build the skills and confidence they need to enter employment.

Q: Customers care about sustainability, what progress have you made in the marketplace?

A: The trust of our customers and patients is essential. We remain committed to offering high quality, relevant, affordable products and services, increasing transparency across our value chain and empowering our customers to make informed choices.

We are enormously proud of our owned-brand products such as No7, Liz Earle and 17, as well as some of the latest new brands we are introducing, such as HABI. We have made significant progress in improving the sustainability of our products – over 90% of palm oil used in our owned-brand products now comes from RSPO physically certified supply chains and we have advanced sustainable packaging across our portfolio, achieving an average of 17% recycled content.

Q: And when it comes to the planet, how are you reducing your footprint?

A: We have always recognised that the health of people and the planet are inseparable and have maintained our long-held commitment to reducing the impact of our own

operations. For FY2025, we are proud to confirm we have exceeded our carbon-reduction target of 30%, achieving a 37.1% reduction in Scope 1 and 2 emissions against our 2019 baseline. We are reducing our own footprint while finding new ways to mitigate the environmental impact of our industry. Through our innovative take-back scheme, Recycle at Boots, we have diverted over 550 metric tonnes of hard-to-recycle materials from landfill in FY2025.

Q: Building on these achievements, what's next for The Boots Group?

A: As we lead our independent business forward, we are not just responding to today's challenges, we are shaping the future of healthcare, pharmacy and retail. We must continue to create a world that supports both healthy people and a healthy planet and continue to make a real difference in the lives of the communities we serve every day and for generations to come.

In 2026, our teams will continue driving progress towards our net zero ambitions by embedding science-based targets through the SBTi framework for our Boots businesses in the UK and Ireland. At the same time, our award-winning Recycle at

Boots scheme will go from strength to strength to transform hard-to-recycle materials helping us, together with our customers, to create a more circular economy. We also look forward to undertaking a comprehensive double materiality assessment, helping to refresh and determine our ESG priorities as The Boots Group.



Ornella Barra

Chair of the Board of Directors and
Chair of the ESG Committee
The Boots Group

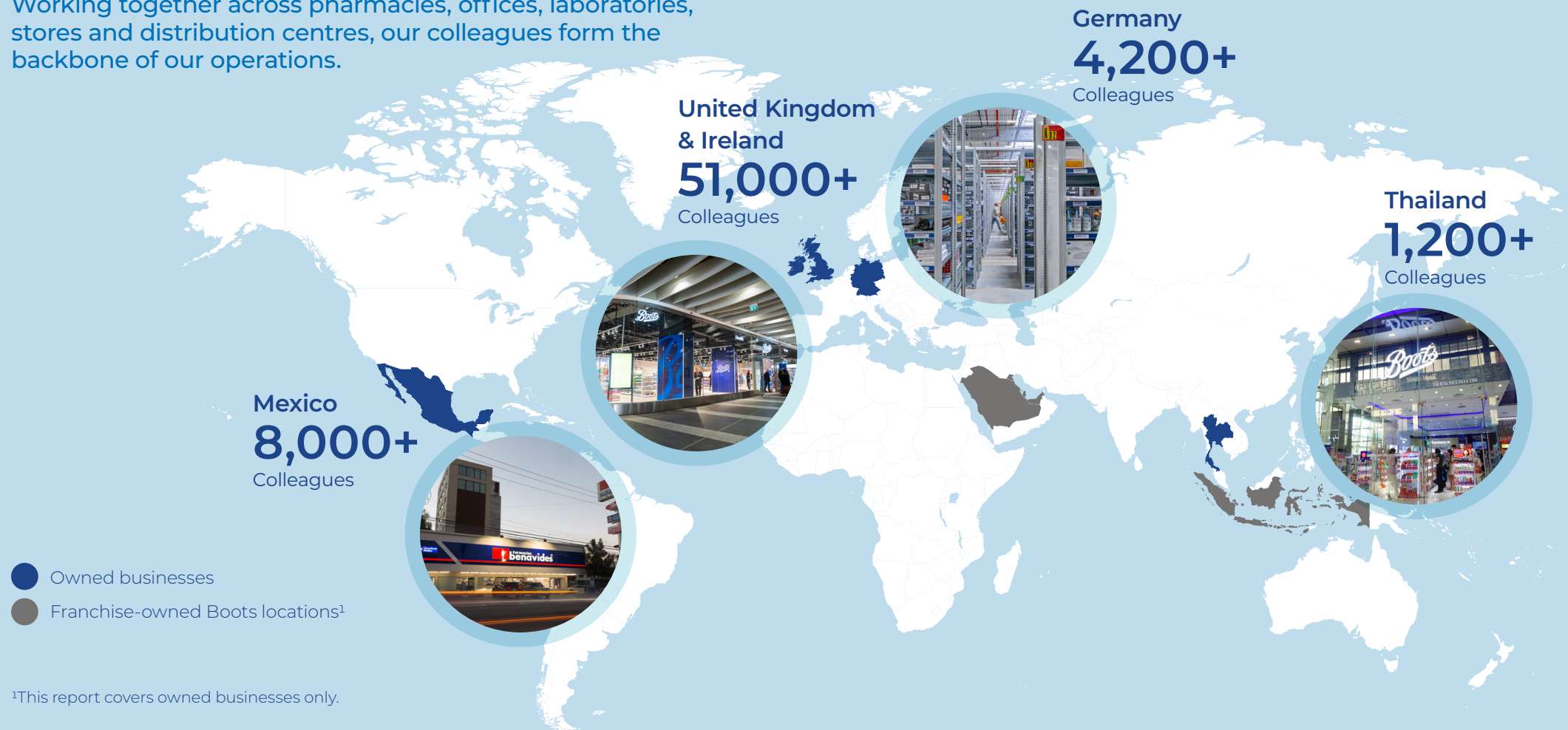
9 February 2026

The Boots Group at a Glance

GRI 2-1, 2-2, 2-6, 3-3, 201-1

Where we work and serve

Our people reflect the communities we serve. Wherever we operate, our teams bring expertise and care to life every day. Working together across pharmacies, offices, laboratories, stores and distribution centres, our colleagues form the backbone of our operations.



Our ESG Strategy

GRI 2-22, 3-3

Healthcare at the Heart of our Strategy

At The Boots Group, health is the foundation of everything we do. Our ESG strategy reflects our commitment to improving health outcomes for people and protecting the planet through accessible care, inclusive workplaces, trusted brands and products, and responsible retail.

We embed ESG principles across every part of our business — from how we design products and source materials, to how we serve customers, patients and communities around the world. Guided by our purpose to support better health, we align commercial success with long-term social and environmental progress.

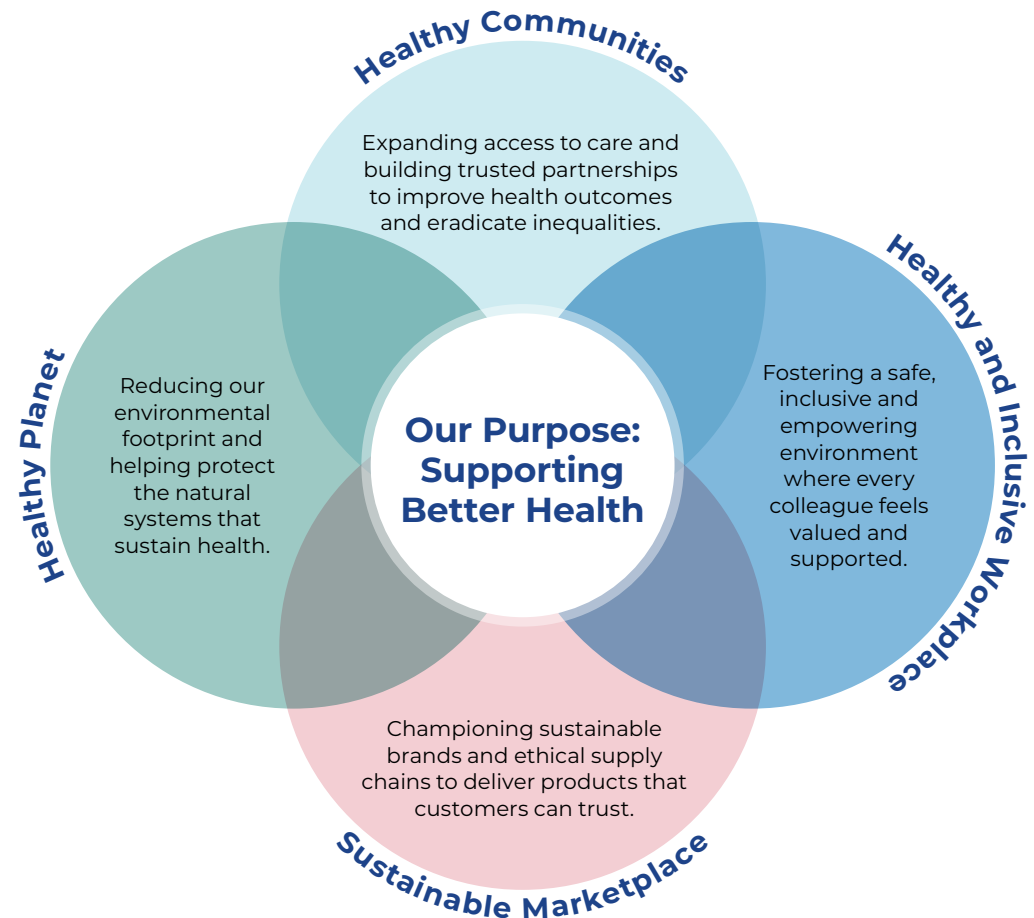
Driven by Stakeholders, Grounded in Accountability

Our ESG priorities are shaped by continuous dialogue with colleagues, customers, partners and communities. Oversight is provided by The Boots Group ESG Committee, chaired by the Chair of the Board of Directors, ensuring that our strategy remains transparent, accountable and embedded in business decision-making.

Together, these commitments define how The Boots Group delivers lasting value — for our people, our customers and patients, and the planet we share.

A Connected Framework for Better Health

Our ESG strategy is built around four interconnected pillars that shape how we operate, grow and create impact:



Our strategy was shaped through ongoing dialogue with our key stakeholders. For more detail on our engagement process during the last reporting period, please see our [ESG Technical Report 2024](#), pages 12-13.

ESG Double Materiality

GRI 2-25, 3-1, 3-2, 3-3

The Boots Group is committed to understanding and managing the full spectrum of its ESG impacts. To achieve this, we employ a double materiality approach (DMA), identifying the topics most critical to our business and our wider impact.

Our latest assessment, conducted in FY2023 in alignment with the principles of the European Union's Corporate Sustainability Reporting Directive (CSRD), continues to guide our ESG strategy and reporting. We refresh our DMA periodically to reflect evolving business and stakeholder priorities.

The Boots Group Material Topics

The most material ESG topics (priority order in brackets) for The Boots Group, as identified through our 2023 double materiality assessment, are presented to the right.



Environmental

- Climate change resiliency (6)
- Sustainable products/packaging and circular economy (15)
- Sustainable supply chain (16)
- Energy and emissions (18)
- Responsible waste management and reduction within our operations (19)
- Biodiversity and healthy ecosystems (23)
- Water resources (24)



Social

- Employee health and safety (2)
- Patient and consumer experience (3)
- Health equity, access and affordability (4)
- Diversity, equity and inclusion (7)
- Product safety and quality (8)
- Service safety and quality (9)
- Human rights in the supply chain (10)
- Public health outcomes improvement (11)
- Prescription drug abuse prevention (12)
- Employee wellbeing and investment (13)
- Community engagement and partnerships (14)
- Animal welfare (25)



Governance

- Data privacy and security (1)
- Business compliance and ethical conduct (5)
- Innovation and digitalisation (17)
- Corporate governance (20)
- Product labelling and transparency (21)
- Engagement in public policy (22)

Stakeholder Engagement

GRI 2-3, 2-6, 2-28, 2-29, 3-3

Engaging and collaborating with our stakeholders is fundamental to our business strategy and our approach to ESC. This ongoing dialogue helps us to identify and address the most relevant environmental, social and governance issues, manage risks and opportunities, and ensure our products and services have a positive impact on the communities we serve.

We regularly consult with our internal and external stakeholders across a range of sectors and geographies to understand their needs, concerns and expectations, which in turn shapes our strategy and ensures we remain a trusted partner.

How We Engage with our Stakeholders

The Boots Group uses a variety of formal and informal channels to maintain an open and continuous dialogue:

- **Direct Dialogue and Meetings:** regular meetings with investors, government bodies, suppliers and community partners. Our leadership team is actively involved in these discussions to align on strategic priorities and address key issues.
- **Surveys and Feedback Mechanisms:** we systematically gather feedback through channels such as our annual colleague engagement survey, customer satisfaction surveys, and post-interaction feedback to measure performance and identify areas for improvement.
- **Daily Interactions:** our 66,000 colleagues, particularly our pharmacists, optometrists, dispensing opticians and beauty advisors, in store and online, are our most important ambassadors.
- **Digital and Media Channels:** our corporate website and social media platforms serve as key channels for transparently communicating our performance, policies and initiatives to a broad audience.
- **Partnerships and Collaborations:** we work closely with non-governmental organisations (NGOs), academic institutions and industry peers to tackle systemic challenges, share best practices and amplify our positive impact.



The Boots Group



Stakeholder Engagement continued

Our Key Stakeholders

Our success is intrinsically linked to the strength of our relationships with our key stakeholders. We are committed to understanding their unique perspectives and integrating their feedback into our decision-making.

- **Board of Directors:** The Boots Group Board oversees the Company's strategic, operational and financial matters.
- **Colleagues:** our colleagues are the heart of our business and the trusted face of Boots in our communities. Their wellbeing, safety and professional development are paramount to creating a Healthy and Inclusive Workplace. Their engagement and expertise are critical for delivering on our promise to customers and patients and for driving our business forward.
- **Customers and Patients:** serving our customers and patients is our core purpose. Their trust in our products, services and advice is our most valuable asset. By listening to their needs, we can innovate and improve, ensuring we provide accessible, high-quality healthcare and retail experiences that contribute to Healthy Communities and a Sustainable Marketplace.
- **Suppliers and Partners:** our suppliers are essential partners in our value chain. Their own ethical, social and environmental performance directly affects our ability to deliver sustainable products.
- **Owners:** as a newly independent company, our relationship with our owners, Sycamore Partners and the Pessina family, is critical. They provide the strategic direction and capital that enable our long-term growth and continued focus.
- **Communities:** The Boots Group is deeply woven into the fabric of the communities we serve. The health and prosperity of these communities is inseparable from our own success.
- **Regulators and Government Bodies:** operating in the highly regulated healthcare and retail sectors requires diligent compliance and proactive engagement. We work constructively with regulators and government agencies to ensure we meet applicable legal requirements and contribute to shaping a policy environment that supports public health and sustainable business practices.
- **Non-Governmental Organisations (NGOs) and Industry Peers:** we partner with NGOs, charities and industry associations to address complex, systemic challenges that no single company can solve alone.
- **Academics:** our engagement with academics is primarily focused on building a stronger, more diverse pharmacy talent pipeline, alongside fostering the scientific research that underpins our innovation.

Stakeholder Engagement continued

Memberships and associations

GRI 2-28

Collaboration is essential to driving systemic change. We actively participate in numerous industry groups, multi-stakeholder initiatives and associations to share best practices, contribute to policy development and advance our shared ESG goals.

- 55Redefined
- Association of British Dispensing Opticians (ABDO)
- B-Corp
- British Beauty Council
- British Retail Consortium (BRC)
- The Business Council
- Business for Societal Impact (formerly the London Benchmarking Group)
- Business in the Community (BITC)
- Business in the Community Ireland (BITCI)
- The Business Roundtable
- Carers UK
- CDP
- Circular Action Alliance (CAA)
- College of Optometrists
- Community Pharmacy (CP) England; CP Northern Ireland; CP Scotland; and CP Wales
- Company Chemists Association (CCA)
- Cosmetic, Toiletry and Perfumery Association (CTPA)
- Cosmetics Europe
- The Council for Responsible Nutrition
- Cruelty Free International (Leaping Bunny)
- The Corporate Social Responsibility (CSR) & ESG Board
- Diversity in Retail
- EcoBeautyScore Association
- EuroCommerce
- Federation of Ophthalmic and Dispensing Opticians (FODO)
- Forum for the Future
- General Optical Council (GOC)
- Global Reporting Initiative (GRI)
- Global Shea Alliance (GSA)
- Henpicked: Menopause in the Workplace
- HITRUST
- How2Recycle®
- International Federation of Pharmaceutical Wholesalers (IFPW)
- International Health Partners
- Industry Council for Packaging and the Environment (INCPEN)
- Institute of Corporate Responsibility and Sustainability (ICRS)
- Irish Business and Employers Confederation and Retail Ireland (IBEC)
- Irish Organic Association
- Irish Pharmacy Union
- Manufacture 2030 (M2030)
- On-Pack Recycling Label (OPRL)
- Palm Oil Transparency Coalition (POTC)
- Pharmaceutical Society of Ireland (PSI)
- Pharmacy Technician Certification Board (PTCB)
- Proprietary Association of Great Britain (PAGB)
- Pride At Work Ireland
- Purple Tuesday
- Radius Networks
- RangeMe
- REPAK
- Retail Energy Forum
- Retail Excellence Ireland
- Retailers Palm Oil Group (RPOG)
- RE-TURN
- Roundtable on Sustainable Palm Oil (RSPO)
- Stonewall
- Sustainable British Beauty Council (SBBC)
- Sustainable Medicines Partnership (SMP)
- Sustainable Packaging Coalition (SPC)
- Sustainable Packaging Initiative for Cosmetics (SPICE)
- Sustainable Procurement Pledge (SPP)
- The Sustainability Consortium
- Union for Ethical Biotrade (UEBT)
- United Nations Global Compact (UNGC)
- Waste and Resources Action Programme (WRAP)
- World Wide Fund for Nature (WWF)



1 Healthy Communities



Management Approach

GRI 3-3, 203-1, 203,2, 413-1

At The Boots Group, we believe that healthy communities are the foundation of a thriving society.

We are deeply embedded in the communities we serve and we recognise our responsibility to contribute to their wellbeing. Our purpose is directly realised through our strategic focus on improving healthcare access and fostering impactful community partnerships. This approach is guided by our senior leadership and is integral to our business model.

Our Strategic Focus

Community health is at the core of our framework. Our extensive network of pharmacies and opticians in the markets where we operate places us in a unique position to serve as a first port of call for health and wellbeing advice. We leverage this accessibility to address health inequalities and provide essential services where they are needed most.

Access to Affordable Healthcare

We are committed to breaking down barriers to healthcare. This includes expanding our range of accessible clinical services, providing trusted advice and medication through our highly trained pharmacy and optician teams, and leveraging digital platforms to make healthcare more convenient and affordable for our customers and patients.

Community Engagement and Partnerships

We understand that we cannot address complex health challenges alone. Our strategy relies on building strong, long-term partnerships with charities, non-governmental organisations (NGOs), patient groups and community organisations. These collaborations allow us to extend our reach, deepen our impact and provide targeted support for specific health issues such as cancer, dementia and hygiene poverty.



Community Investment

GRI 201-1, 3-3, 413-1

Investing in the health of our communities is a core part of our work. As a group, our commitment goes beyond our stores, reflecting our deep integration with, and responsibility to, the people we serve.

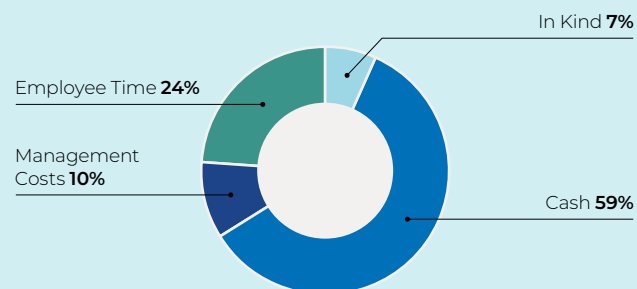
We dedicated £6.7 million to direct community investment in FY2025, consisting of cash and in-kind donations. This figure represents our direct company contributions, excluding customer and colleague fundraising, to provide a clear view of our corporate investment. We collect and report our community investment data in line with the globally recognised Business For Societal Impact (B4SI) model to ensure consistency and comparability.

£6.7 million

Our direct contributions in FY2025

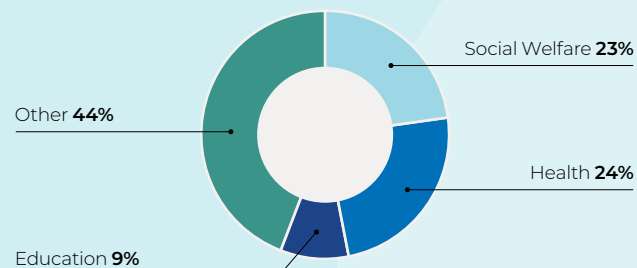
Contribution by Type: our total contribution is composed of cash donations, the value of in-kind product donations and colleague time, and associated management costs. The breakdown for FY2025 is as follows:

How The Boots Group contributed in FY2025



Contribution by Impact Area: our giving strategy focuses on key societal areas where we can make the most significant impact. In FY2025, our contributions were allocated across the following strategic impact areas:

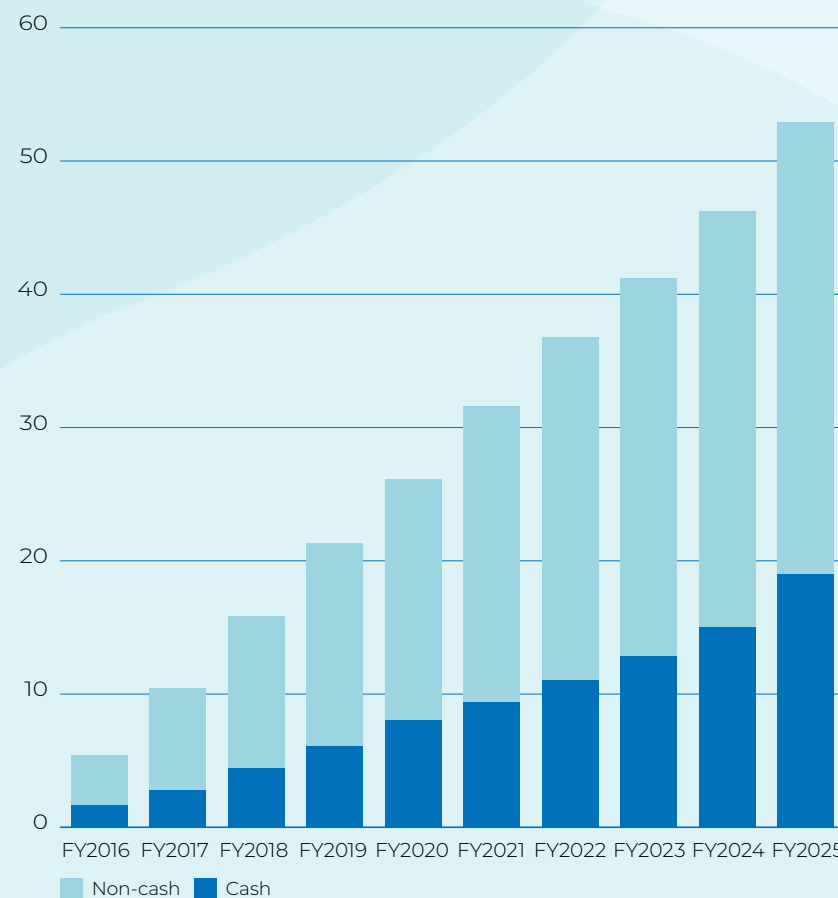
Areas impacted by The Boots Group's FY2025 contributions



Cumulative Giving: since establishing our baseline in FY2016, The Boots Group entities have maintained a steadfast commitment to community investment. Our cumulative giving over the past decade demonstrates our sustained dedication to building healthy communities.

Corporate giving – cumulative since FY2016

GBP (millions)



2 Healthy and Inclusive Workplace



Management Approach

GRI 2-7, 3-3, 401-1

Our colleagues are our greatest asset and play an essential role for customers and patients in the communities we serve. Prioritising colleague health, safety and wellbeing is a fundamental strategic imperative for The Boots Group.

We are dedicated to cultivating a safe, healthy, and respectful working environment for our colleagues. This commitment is deeply embedded in our corporate strategy, governed by robust policies and championed by senior leadership. Our approach is underpinned by a clear governance structure, ensuring that we maintain a Healthy and Inclusive Workplace across our entire operations.

Strategic Focus

Our strategy is guided by comprehensive internal policies. Our Code of Conduct and Ethics serves as the foundational policy for The Boots Group, underscoring our commitment to integrity and ethical behaviour. It applies uniformly to all colleagues and operations across the globe, setting clear expectations for conduct.

Prioritising Colleague Health and Wellbeing

Our policies offer clear direction on conducting all business operations with the highest regard for the health and safety of our colleagues, customers and patients, business partners, contractors and the general public.

Cultivating an Inclusive and Supportive Workplace

We ensure our leaders are equipped with the necessary training and policy knowledge to foster a positive culture. Through our leadership development programmes and wellbeing initiatives, we ensure that our cultural objectives are a priority across all levels of the business, reinforcing a workplace where every colleague is enabled to be at their best.



Demographic of Workforce

GRI 2-7

Inclusion is essential to The Boots Group strategy, having a measurable positive impact on business performance, operational resilience, organisational growth and colleague satisfaction. We recognise that to serve our diverse customers and patients effectively, we must reflect that diversity within our own organisation.

By recruiting, retaining and supporting colleagues from varied backgrounds, cultures and experiences, we gain a range of perspectives that drive innovation and enhance decision-making. Learning from these broad experiences is critical for delivering the care and retail experiences our communities expect.

The Boots Group is fundamentally committed to equal opportunity for all. Our policies ensure that all our colleagues respect one another and engage each other with courtesy and dignity. This commitment to non-discrimination is applicable across all protected characteristics.

We are committed to transparently reporting on the composition of our workforce to hold ourselves accountable for progress against our objectives.

Our demographic data provides a snapshot of our teams across various roles, informing our ongoing strategy to build a truly inclusive organisation.



Diversity of The Boots Group employees¹

GRI 2-7, 405-1

Employment category	Age group (%)			Gender (%)		
	Under 30	30 to 50	Over 50	Male	Female	Undisclosed
Manager	13	63	24	31	69	–
Non-manager	37	36	27	23	77	–
All employees	34	40	26	24	76	–

¹ FY2025 data within Deloitte LLP's review scope as detailed on pages 85-93.

Employee Type, Turnover and Parental Leave

GRI 401-1, 401-3, 405-1

The following tables provide a detailed breakdown of our workforce data for FY2025. These metrics cover the gender, age and regional diversity of our team, rates of new hires and turnover, and the retention of colleagues following parental leave.

Employees by contract type

GRI 2-7	(%)
Full-time	57
Part-time	43
Permanent employees	94
Temporary employees	6

Employees by gender and contract type

GRI 2-7	Male (%)	Female (%)	Undisclosed (%)	Total (%)
All	24	76	–	100
Permanent	23	77	–	100
Temporary	33	67	–	100
Full-time	29	71	–	100
Part-time	17	83	–	100

Parental leave — employees by employment type

GRI 2-7	Gender			Total
	Female	Male	Undisclosed	
Employees eligible for parental leave	48,256	13,902	–	62,158
Employees who took parental leave	1,000	158	–	1,158
Employees who returned to work from parental leave	822	156	–	978
Employees who returned from parental leave and worked 12 months	720	143	–	863

Number and rate of new employee hires

GRI 401-1¹

New employee hires	12,442
Rate of new employee hires	20%

¹ Includes only employees of Boots UK, Boots Ireland, and Boots Opticians as our most material employing entities.

Number and rate of new employee hires and employee turnover

GRI 401-1

Employment type	Age Group			Gender		
	Under 30	30 to 50	Over 50	Male	Female	Undisclosed
New employee hires	8,228	3,128	1,086	3,047	9,395	–
Rate of new employee hires	13%	5%	2%	5%	15%	–
Employee turnover	7,983	3,771	1,932	3,120	10,566	–
Rate of employee turnover	13%	6%	3%	5%	17%	–

Employee turnover

GRI 401-1

	Voluntary turnover (%)	Involuntary turnover (%)	Total employee turnover (%)
The Boots Group	20	2	22

3 Sustainable Marketplace



Management Approach

GRI 2-23, 3-3, 205-1, 206-1

At The Boots Group, we believe a sustainable marketplace is built on a foundation of shared responsibility, ethical practices and collaboration.

Trust is placed in our brands by millions of customers and patients — this is a responsibility we are determined to uphold through responsible and sustainable sourcing. We are committed to supporting better health for our colleagues, patients, customers and the planet by developing authentic products while acting as responsible stewards of the resources we use.

Strategic Focus

Our approach to creating a sustainable marketplace is centred on two interconnected priorities that guide our product development, sourcing and customer engagement strategies:

- Sustainable products, packaging and a circular economy
- Patient and customer experience

This commitment to a sustainable marketplace extends throughout our value chain. We work collaboratively with suppliers who share our values and meet our high standards for environmental and social performance, driving continuous improvement through engagement and transparent assessment.

The trust customers and patients place in our brands is paramount. We uphold this through a steadfast commitment to product integrity, ensuring all our owned-brand products meet rigorous safety, quality and authenticity standards through comprehensive testing and analysis.

Governance and Oversight

Our actions are guided by a comprehensive framework of policies and leadership structures that ensure accountability and compliance throughout our supply chain and product development processes. This framework is reviewed regularly by senior leadership and the ESG Committee. Our core policies include:

- **The Boots Group Code of Conduct and Ethics:** this foundational policy applies to all colleagues and operations, underscoring our unwavering commitment to integrity. It serves as our compass for how we behave, guiding us to make honest and ethical decisions that align with our values and the law.
- **Supplier Code of Conduct:** our Supplier Code of Conduct outlines our core principles for supplier practices, including compliance with laws and regulations; terms and conditions of employment; discrimination; harassment and retaliation; wages and benefits; child labour; health and safety; sustainable development and environmental protection; data privacy; and anti-corruption and bribery. We expect suppliers to operate in accordance with these principles and be open to and transparent in our assessment of their compliance with the code.
- **Modern Slavery and Human Trafficking Statement:** our Modern Slavery and Human Trafficking Statement details our commitment to eradicating these abhorrent practices and our policies, governance and training regarding these issues.
- **Human Rights Policy Statement:** our Human Rights Policy Statement contains our explicit commitment to respect human rights under international standards and protect labour and workplace rights.
- **Product Testing Policy Statement:** our Product Testing Policy Statement outlines our support for a global ban on animal testing.
- **ESG Policy Statements:** reviewed annually by The Boots Group ESG Committee, these policy statements set forth guidance and compliance requirements related to human rights, our responsible chemical management strategy, product testing and product transparency. These policy statements apply to all businesses and corporate functions.

Ethical Sourcing Standards

GRI 2-23, 2-24, 3-3, 206-1, 308-1, 308-2, 403-7, 413-1, 414-1, 414-2

We are committed to upholding the highest ethical standards across our supply chain. We prioritise responsible supplier engagement and ethical sourcing practices to ensure the integrity of our products and protect the rights of the people who make them.

Supplier Engagement and Auditing

The Boots Group assesses 100% of our owned-brand suppliers for compliance with our Ethical Trading Standards, which include environmental criteria, through on-site audits. This compliance is further ensured through a thorough onboarding process that includes supplier training webinars. These webinars explain our standards and assessment requirements, highlight opportunities for suppliers to enhance social and environmental compliance, and provide a forum for questions.

We prioritise transparency and continuous improvement in our ethical sourcing practices. We monitor supplier compliance using a grading matrix that assesses factory performance based on internationally recognised standards like the Ethical Trading Initiative (ETI) Base Code and International Labour Organization (ILO) Conventions and

Recommendations. Factories with identified non-compliances must implement corrective and preventative action plans to rectify issues. They are reassessed using a risk-based approach focusing on improvement and compliance.

For high-value goods not for resale (GNFR) suppliers, The Boots Group uses Global Risk Management Solutions (GRMS), which includes screenings for social criteria.

Proactive Risk and Opportunity Identification

The Boots Group proactively identifies risks and opportunities within supplier practices and supply chains through our Supplier Sustainability Programme. This programme evaluates supplier sustainability performance by product category, leveraging insight systems for data collection, analysis and reporting. This provides a clearer view of opportunities

and risks at the product category level, enabling us to better target supplier engagement and support the development of our brands and supplier sustainability strategy.

Supplier Compliance Assessments

We disclose our owned-brand suppliers' adherence to our ethical standards. The table below provides a breakdown of our FY2025 ethical compliance assessments on new and existing suppliers of owned brands for The Boots Group.

	FY2025	FY2025 (%)
Satisfactory	199	62.8
Needs Improvement	92	29.0
Critical	26	8.2
Zero Tolerance	0	–
Total	317	100.0

- **Satisfactory and Needs Improvement:** meets our ethical trading standards expectations but could require differing levels of remedial corrective actions.
- **Critical:** falls below the expectations of our ethical trading standards and requires immediate remedial action to address critical non-compliance to enable new or ongoing business relations.

- **Zero Tolerance:** issues identified that are not accepted or tolerated by our business and are related to incidents of, but not limited to, child labour, convict/indentured/forced labour, corporal punishment, slavery and human trafficking, and acts of bribery. In all cases, we view these issues as zero tolerance.

Our policy on zero tolerance violations is to terminate the business relationship with the site where the violation occurred and suspend the supplier and its other sites pending a full investigation. If the supplier is directly implicated, or if further violations are found, the business relationship will be terminated. When country-specific allegations of forced labour are raised, we perform due diligence to identify and mitigate this risk in our supply chain. We also engage with industry peers to share best practices in risk prevention, detection and mitigation.

Chemical Use and Management

Our strategy is designed to drive innovation toward safer product alternatives while ensuring transparency in our management practices. Central to this approach is our [Restricted Substances List \(RSL\)](#), which exceeds standard regulations by taking a firm position on chemicals identified as concerning. This list is dynamic and we regularly review our product categories and substances for new inclusions.



Palm Oil Sourcing

Palm oil is a versatile and efficient crop that plays a significant role in many industries. However, its production has been linked to deforestation, habitat degradation and human rights abuses, making sustainable sourcing practices a critical focus for our business. As a long-standing member of the Roundtable on Sustainable Palm Oil (RSPO), The Boots Group is committed to implementing the RSPO Shared Responsibility requirements within our palm oil-related operations.

Our Commitment to Sustainable Palm Oil

Our commitment is to source 100% RSPO-certified sustainable palm oil

across all our owned brands. We achieve this through a combination of physical certification (RSPO-Mass Balance and RSPO-Segregated) and the purchase of RSPO Smallholder Credits, which directly supports small-scale farmers in sustainable cultivation practices.

Latest Sourcing Performance

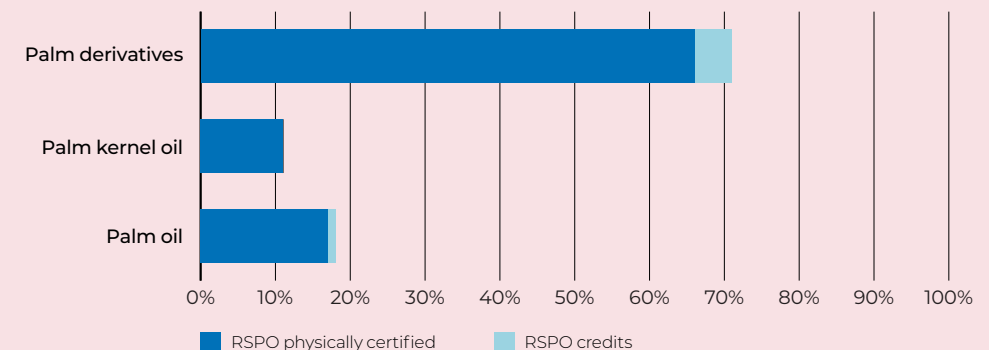
In calendar year 2024, The Boots Group sourced over 90% of the palm oil used across our owned-brand products (including Boots and No7 Beauty Company) from RSPO physically-certified supply chains.

For the remaining volume, we maintained our commitment to supporting small-scale producers by purchasing RSPO Smallholder Credits.

This dual approach ensures that our entire palm oil footprint supports the sustainable palm oil market while directly contributing to the livelihoods of smallholder farmers.

The following chart provides a detailed breakdown of our certified palm oil sourcing by type for the calendar year 2024.

Breakdown of The Boots Group Palm Oil Usage in Calendar Year 2024



Sustainable Packaging

GRI 301-1, 301-2, 306-1, 306-2, 306-3, 308-1, 308-2

The challenge of packaging waste remains a significant concern within our industry and for our customers and patients. We are committed to reducing our environmental impact by implementing a comprehensive sustainable packaging strategy across our owned brands.

Our Sustainable Packaging Strategy

Our approach to reducing packaging waste is multifaceted. We focus on optimising packaging design to reduce overall material use, increasing the use of post-consumer recycled (PCR) content and ensuring our packaging is designed for maximum recyclability at the end of its life. This strategy is driven by close collaboration with our suppliers and a commitment to innovation in materials and design.

Progress Against Our Goals

As a founding signatory of the UK Plastics Pact, we remain dedicated to achieving its ambitious 2025 targets. In FY2025, we continued to make significant progress:

- **Target 1 — 100% of Plastic Packaging to be Reusable, Recyclable or Compostable:** we continue to make good progress, for example medicine blister packs, are accepted by our take-back schemes.
- **Target 2 — Eliminating Problematic or Unnecessary Plastics:** we have made great progress and, for the relatively small volumes that remain, our take-back schemes ensure they are responsibly managed.
- **Target 3 — Recycled Content:** achieving our target of 30% average recycled content across all plastic packaging remains challenging due to regulatory constraints, material availability and cost. However, we continue to make progress and actively work with our suppliers to increase PCR content wherever feasible and safe.

Packaging Material by Weight

The table below shows the metric tonnes of different packaging materials used in our owned-brand products for the calendar year 2024 (our most recent full year of data) compared to the previous year.

Packaging Material (metric tonnes)	Calendar Year 2024	Calendar Year 2023	YoY Variance
Glass	1,665	1,797	(7)%
Metal	452	742	(39)%
Plastic ¹	3,712	3,607	3%
Wood, pulp and paper ²	5,889	4,579	29%
Textiles	25	36	(31)%

¹ GRI 306-3 specified disclosures for plastic only are within Deloitte LLP's review scope as detailed on pages 85-91.

² Excludes pallets.



4 Healthy Planet



Management Approach

GRI 3-3

We recognise that a thriving environment is not merely a corporate responsibility but a fundamental pillar of our business success, directly influencing our operations, the wellbeing of our colleagues and the health of our customers and the planet.

Strategic Focus

Our dedication to achieving a healthy planet is demonstrated through a comprehensive strategy focused on significantly reducing our carbon emissions and championing robust waste-reduction initiatives across our value chain.

Climate Change Resiliency

We understand that climate change presents serious and far-reaching implications, from operational disruptions and supply chain vulnerabilities to impacts on public health and the communities we serve, necessitating a proactive and adaptive business strategy. The Boots Group is firmly committed to actively reducing our operational footprint, building on the significant progress already made.

Our climate change resiliency strategy focuses on driving innovation in energy efficiency across our extensive network of stores and warehouses, implementing smart technologies to optimise consumption. Furthermore, we are actively transitioning our vehicle fleet away from fossil fuels and leveraging advanced AI planning to optimise logistics. These integrated efforts underscore our commitment to mitigating environmental impact while building a more resilient future.

Responsible Waste Management and Reduction within our Operations

Our responsible waste management strategy is built upon the foundational principles of reduce, reuse and recycle, aiming to minimise our environmental footprint at every stage of our operations. We prioritise reducing waste at the source through sustainable product design and packaging innovations, actively seeking to decrease material consumption.

Our commitment extends to pioneering recycling solutions, exemplified by our innovative blister pack recycling scheme, accessible to customers via our 'Recycle at Boots' initiative in the UK. We actively engage both our colleagues and customers to adopt better practices, encouraging them to recycle more and waste less.



Energy and Emissions

GRI 302-1, 302-3, 305-1, 305-2, 305-3, 305-4, 305-5

Decisively reducing our carbon emissions is a cornerstone of our Healthy Planet pillar and central to our transition to a more Sustainable Marketplace.

Our Carbon Emissions-reduction Progress

We are proud to report that the Company has exceeded its emissions-reduction target ahead of schedule. Our ambition was to reduce our total Scope 1 and Scope 2 emissions by 30% by the end of FY2030, compared to a 2019 baseline. Due to focused, strategic investments in FY2025 and previously, we have already surpassed this goal, achieving a 37.1% reduction, demonstrating our commitment to swift climate action as a standalone company.

This significant progress is a result of enhanced efficiencies across our operations, focusing on the largest sources of our energy use. We are achieving this through implementing enhanced energy management systems across our retail outlets and warehouses and utilising advances in technology for greater efficiencies in our fleet and route mapping, which optimises logistics.

Our Approach to Reporting Emissions

The Boots Group continues to report greenhouse gas (GHG) emissions for all entities over which it has financial control, as defined by the GHG Protocol Corporate Accounting and Reporting Standard. We have set FY2019 as the GHG baseline year for Scope 1 and Scope 2 emissions.



Further information on our progress against our emissions-reduction goals can be found on page 27.



Sources of Carbon Emissions:

- **Scope 1 Emissions (Direct emissions from sources controlled by the Company):** these primarily result from the use of fuel for heat and The Boots Group-owned fleet vehicles.
- **Scope 2 Emissions (Indirect emissions from purchased energy):** these are generated from purchased electricity, heat and steam consumed by The Boots Group, largely related to energy use for lighting, heating and cooling our stores and facilities.
- **Scope 3 Emissions (Indirect emissions not owned or controlled by the Company):** we report on key categories, including business travel and the portion of downstream transportation and distribution.

Energy and Emissions continued

FY2025 emissions data

CO₂e emissions from energy, by type

('000 metric tonnes)

	FY2025	FY2024	FY2019	% change FY2025 from FY2019
Electricity	82	89	134	(39)
Gas	9	11	18	(48)
Other	10	11	7	40
Total	102	111	159	(36)

CO₂e emissions from business travel

(Metric tonnes per thousand employees)

	FY2025	FY2024	FY2019	% change FY2025 from FY2019
The Boots Group	126	124	118	7

Scope 1, 2 and 3 GHG emissions

(Global CO₂e emissions ('000 metric tonnes))

GRI 305-1, 305-2, 305-3

	FY2025 ¹	FY2024	FY2019	% change FY2025 from FY2019
Scope 1	35	37	49	(27)
Scope 1 (Sales to third parties) ²	19	25	32	(42)
Gross Scope 1	54	62	81	(33)
Scope 2 location based	71	79	120	(41)
Gross Scope 1 and 2 location based²	125	141	201	(38)
Scope 3 ³	67	68	58	16
Gross Scope 1, 2 and 3 location based²	192	208	258	(26)
Scope 2 market based	68	75	60	13
Gross Scope 1 and 2 market based²	122	136	140	(13)

¹ GRI 305-1, 305-2 and 305-3 are within Deloitte LLP's review scope as detailed on pages 85-91.

² Includes Scope 1 emissions resulting from heat and electricity produced by The Boots Group's on-site combined heat and power plant in Beeston, Nottingham, UK and sold to third parties or the grid.

³ The Boots Group is reporting on two of the 15 Scope 3 categories. See Basis of Presentation on page 92.

GHG emissions intensity

('000 metric tonnes of CO₂e per USD million sales,

Gross Scope 1 and 2 location based)

GRI 305-4¹

	FY2025	FY2024	FY2019	% change FY2025 from to FY2019
Emissions intensity per USD million in sales	0.0049	0.0059	0.0134	(63)

¹ GRI 305-4 is within Deloitte LLP's review scope as detailed on pages 85-91.

Waste

GRI 301-3, 306-1, 306-2, 306-3,306-4, 306-5, 413-1, 417-1¹

Waste Reduction, Reuse and Recycling

Our approach covers a broad spectrum of waste-reduction activities, from reducing material consumption to enhancing reuse and recycling opportunities across our value chain.

We monitor waste generation and disposal across all our business operations, ensuring we understand our footprint. Waste is primarily managed at a local level, working with trusted third-party vendors to ensure responsible and compliant handling of all waste streams. To ensure a comprehensive and collaborative approach, we prioritise educating and raising awareness on waste reduction amongst our colleagues across the business, empowering them to contribute to our environmental goals.

We are driving waste reduction through targeted initiatives across our operations. In Mexico, our Farmacias Benavides business has collaborated with suppliers to upgrade to more durable wooden distribution pallets, reducing material waste. In parallel, Alliance Healthcare Deutschland has streamlined its logistics network by

consolidating warehouses, resulting in fewer product returns and a more efficient operation.

Diverting, Reducing and Repurposing Waste

Our operational focus ensures that the majority of our waste is diverted from environmentally detrimental disposal methods. In FY2025, Boots UK, Boots Ireland and Boots Opticians successfully diverted over 26,900 tonnes of operational waste, with only 103 tonnes sent to landfill, a 1% decrease from the previous fiscal year. This reduction is primarily attributed to the success of our zero-waste partnerships, such as that with Olio in the UK.

We are also actively increasing the volume of materials we recycle or reuse. In FY2025, Boots UK, Boots Ireland and Boots Opticians recycled or reused almost 17,000 tonnes of materials, a 4% increase since the previous year. This rise is underpinned by the success of internal initiatives and our continued engagement with customers and patients through schemes like ‘Recycle at Boots’,

which provides an accessible way for our customers to recycle difficult-to-recycle products.

FY2025 Waste Data

Across all our businesses, 9,000 metric tonnes of waste went to landfill or incineration in FY2025, a decrease of 30% from our baseline year of 2019, brought about by our growing recycling initiatives and enhanced waste management processes. In total, we recycled or reused 80,000 metric tonnes of materials in FY2025, an increase of 109% since 2019.

At Boots UK, Boots Ireland and Boots Opticians, waste data is received from third-party suppliers on a regular basis. The data is rigorously evaluated for completeness. We note that some data is estimated based on waste container type and frequency of retrieval. We are continuously reviewing opportunities to enhance our reporting processes to improve data accuracy and completeness in the future.

The businesses within The Boots Group continuously identify opportunities to reduce waste through donation and diversion programmes. See the [ESG Impact Report 2025](#) for details and specific examples.

Waste by method of disposal ('000 metric tonnes)

	FY 2025	FY 2024	FY 2019	% change from FY2019
Landfill	9	9	13	(29)
Incinerated	–	–	–	(88)*
Total	9	9	13	(30)

Materials diverted from disposal ('000 metric tonnes)

	FY 2025	FY 2024	FY 2019	% change from FY2019
Recycled	33	33	39	(16)
Reuse	48	48	–	**
Total	81	81	39	109

* Quantities less than 500 tonnes
 ** % change not relevant

¹ GRI 306-3, 306-4, and 306-5 are within Deloitte LLP’s review scope as detailed on pages 85- 91.

5 Governance



Governance

GRI 2-2, 2-6, 2-9, 2-10, 2-11, 2-12, 2-13, 2-18, 2-19, 2-20, 403-1

The Boots Group is committed to the most rigorous governance practices and as a newly private equity-owned company intends to follow the Wates Corporate Governance Principles for Large Private Companies and, separately, the Walker Guidelines for private equity-owned portfolio companies.

Our ESG Committee provides oversight of our ESG strategy. The Chair of the Board of Directors is also Chair of the ESG Committee helping the Board to stay informed on the strategy and progress.

Streamlining our Governance Framework

Prior to the end of August 2025 and immediately before its financial year end, The Boots Group formed part of Walgreens Boots Alliance (WBA), a US-listed entity on NASDAQ, which included both the Walgreens and Boots groups of companies.

On 28 August 2025, the WBA group was delisted from NASDAQ and taken private by private equity firm Sycamore Partners. The Boots Group was concurrently established as a privately-owned standalone entity, with Sycamore Partners in partnership

Stefano Pessina and his family, being the new owners of The Boots Group following the takeover.

Given the recent formation of The Boots Group, our first annual report is expected to be published for the financial period ending 31 August 2026.

The Boots Group is overseen by the Board of The Boots Group Limited, with Ornella Barra as the Chair. Our governance is underpinned by four committees:

- The Audit Committee
- The ESG Committee
- The Remuneration Committee
- The Executive Committee

Our ESG framework remains fully integrated with our core business strategy.

Ornella Barra also serves as Chair of the ESG Committee, and the ESG function reports directly to her. This fosters quicker decision-making and

ensures that our ESG agenda is championed at the highest level.

Reflecting our commitment to a holistic approach, the composition of the ESG Committee ensures representation from across our operations. The committee includes functional heads and senior leaders from key business units, including Commercial, Communications, Finance and Human Resources. This structure embeds ESG accountability throughout the organisation, making it a shared responsibility for our entire leadership team.

This model is designed to create a governance framework that is both accountable and agile, positioning The Boots Group to effectively deliver on our lasting commitment to our colleagues, customers and patients, and the planet.



Corporate Governance and Risk Management

GRI 2-9, 2-10, 2-12, 2-13, 2-14, 2-17, 2-18, 2-23, 2-24, 403-2, 405-1

We continue to maintain comprehensive governance and risk management processes.

Board Responsibility and Composition

The Boots Group Board is responsible for reinforcing our governance practices and actively oversees the Group's strategic direction, operational performance, financial matters, and management of both potential and actual risks. This deep engagement enables the Board to effectively ensure the long-term objectives of The Boots Group are met.

The Board's composition reflects our commitment to strong oversight, providing a blend of experience and perspectives necessary for effective governance; 80% of Board members are over the age of 50 and 20% of Board members are female. Details on the composition of the Board will be provided in The Group's FY2026 annual report.

The Board evaluates its processes and composition to ensure it can effectively steer The Boots Group through an

evolving landscape of complex organisational considerations.

To ensure a seamless transition and retain deep institutional knowledge, the Board of The Boots Group benefits from the continued service of key leaders from the former WBA Board. Ornella Barra is Chair of The Boots Group Board, with Stefano Pessina and John Lederer continuing as directors on the Board of The Boots Group. This continuity provides stability and deep-seated business expertise, which is invaluable as we navigate our first year as a standalone company.

In line with our new ownership structure, the Board also includes two representatives from our new majority shareholder, Sycamore Partners. Their inclusion brings a breadth of business and investment expertise, enhancing the Board's strategic governance and its ability to guide The Boots Group's long-term growth.

Board Oversight

Board oversight includes a review of the Company's management of related risks and opportunities, including those that are climate-related, in consultation with the Audit Committee, where relevant.

The Audit Committee reviews and discusses the key risks identified in risk management programmes with leadership, their potential impact on our operations and our risk-mitigation strategies. These risks may be related to climate change, sustainability and other ESG-related matters. We routinely evaluate our risk-mitigation activities and, when risks are identified above a certain threshold, we work to develop action plans with timelines and responsibilities that are monitored and reported upon following implementation.

The Audit Committee is also responsible for the oversight of The Boots Group's Internal Audit function, which works with management

to evaluate and improve the effectiveness of our governance, risk management and control processes. In fulfilling this responsibility, the Audit Committee actively engages with and approves the Internal Audit department's charter, the risk-based internal audit plan and the department's budget and resource plan. The Committee also oversees decisions regarding the appointment, removal and remuneration of the external auditor, who reports functionally to the Committee.

Furthermore, the Audit Committee receives regular reports from the Internal Audit department and discusses reports from The Boots Group's external auditor at each Committee meeting. The Committee also meets privately in executive session with the external auditor at each of its quarterly meetings.

Corporate Governance and Risk Management continued

GRI 2-14

ESG Committee Responsibilities

The ESG Committee plays a key role in the governance of our ESG programme. The Committee is composed of senior leaders from across our key businesses and departments and meets at least four times a year. Its responsibilities include reviewing the overarching ESG strategic framework, approving our materiality assessment, monitoring stakeholder engagement and overseeing the completion of key disclosure projects. The ESG Committee sets and approves our ESG commitments and targets, oversees our progress and approves the annual ESG report documents.

We acknowledge the long-term effects of global climate change, which present both physical and transition risks that could be widespread and unpredictable. We disclose more information on the actions taken stemming from our climate scenario analysis and identified risks and opportunities within the following documents:

- TCFD Index, on page 74
- [CDP Climate Questionnaire](#)

The Boots Group monitors best practices for disclosing physical and transition risks to maintain high reporting standards.



Policies

GRI 2-23, 2-24, 205-1, 205-2, 206-1

We are committed to upholding integrity, transparency and high standards of conduct across our entire value chain, fostering a clean, safe and respectful environment for colleagues, customers and patients. We understand that effective governance is built on accessible, objective policies and clear behavioural expectations applied consistently throughout the organisation, regardless of role or geography.

To ensure we continue to hold ourselves to a high standard of conduct, we have clearly outlined how we expect our people to behave through robust organisation-wide and business division-specific policies that incorporate internationally accepted human rights.

Policy Development and Review

The Boots Group's policies cover a range of topics, from environmental impact and compensation to data privacy and procurement practices. We are committed to upholding and introducing new policies where required, maintaining our belief that clear direction is a pillar of successful governance. New policies are developed in accordance with regular due diligence that covers a range of topics, including human rights.

All Group policies are available via our intranet and relevant policies are available on our [corporate website](#).

Adherence and Accountability

All colleagues are required to familiarise themselves and comply with the requirements of all internal policies. This commitment extends to adhering to our [Code of Conduct and Ethics](#) and local policies as applicable.

The Boots Group also requires all companies in which it holds a controlling interest, as well as all parties acting on its behalf, including consultants, agents, suppliers, intermediaries and representatives, to uphold the principles outlined in its Code of Conduct and to establish specific policies, procedures and standards to support these principles.

As a dedicated community pharmacy and healthcare provider, our operations have a significant and far-reaching impact. We are committed to respecting and upholding the dignity, wellbeing and human rights of every individual affected by our business activities, including our patients and customers, colleagues, suppliers, local communities and all The Boots Group affiliates.

We are also committed to ensuring that our policies and actions adhere to internationally recognised human rights as detailed in the United Nations Guiding Principles. Our [Human Rights Policy Statement](#) is based on the International Bill of Human Rights, adopting core labour standards from the International Labour Organization.

All these values are explicitly reflected in our public [ESG policy statements](#), available to read on our website. These statements shape our approach to our ESG activities.



Code of Conduct and Ethics

GRI 2-15, 2-16, 2-23, 2-26, 3-3, 205-2, 206-1

Following the creation of The Boots Group, a new Code of Conduct and Ethics was introduced, establishing the foundational principles for how our people are expected to behave. This defines the standards to which we hold ourselves and our partners, specifically covering critical areas such as environmental impact, compensation, data privacy and ethical procurement practices.

The Boots Group Code of Conduct and Ethics serves as our fundamental ethical guide, providing a compass for how we behave as a company, a team and as individuals. It steers us to promote honest and ethical decision-making that aligns with our core values while ensuring compliance with applicable laws and regulations in the markets where we operate. We rely on the Code to support our colleagues in consistently doing what is right across our dynamic business environment.

Scope and Training

The Code applies universally to the Board, The Boots Group officers, colleagues at the group level and across all our subsidiaries and controlling interests, and all parties acting on our behalf, including consultants, agents, suppliers and representatives. We expect every individual involved with The Boots Group to read, understand and comply with this Code. To ensure this, all part-time and full-time colleagues

receive annual training on the Code and must formally attest to their responsibilities to abide by the Code and all applicable The Boots Group policies.

Establishing a Speak Up Culture

As an integral part of our 'speak-up' culture, we maintain a confidential Compliance and Ethics Hotline and online portal. These are available 24/7 in local languages, managed by an independent third party, for any colleague to raise concerns about inappropriate business conduct or unethical behaviour without fear of retaliation. We expect our people to act ethically and responsibly in all contexts and this expectation extends to every level of our organisation.



Colleague Health and Wellbeing

GRI 401-2¹



Health Benefits and Resources

Investing in the health and wellbeing of our colleagues is essential for maintaining a thriving workforce and a successful business.

Across The Boots Group, we offer comprehensive benefits and wellbeing programmes and, where applicable, healthcare for colleagues at the national, state or regional level, with plan design, coverage laws and regulations varying at a country, state and local level.

In this report we focus on two of our largest employer groups, Boots UK and Boots Opticians, which constitute approximately 75% of our 66,000 colleagues. For further information on our benefits, please see the [ESG Impact Report 2025](#).

For Boots UK and Boots Opticians full-time and part-time colleagues, we offer:

Financial Benefits:

- Enhanced maternity, paternity and adoption pay
- A £100 gift card for colleagues expecting or adopting a child
- Enrolment in the Boots Retirement Savings Plan
- Access to the Boots Benevolent Fund

Employee Discounts:

- Generous employee discounts plus enhanced discounts for Boots brands, Boots Opticians and Boots Hearingcare, including a free eyesight test
- Access to corporate discounts and offers, including retail, cinema, holidays etc.

Professional Benefits:

- Reimbursement of GPhC/PSNI fees (for pharmacists)
- Reimbursement of GOC fees (for optometrists, contact lens opticians and dispensing opticians)
- Insurance cover for professional roles

Lifestyle and Wellbeing Benefits:

- Employee Assistance Programme
- Holiday entitlement that increases with length of service
- Flexible benefits scheme (via salary sacrifice) including discounted gym membership, dental cover, life assurance, restaurant discount cards, activity passes, holiday buying and much more (exclusions may apply, eligible roles only)
- Free membership to The IVF Network, providing access to expert-led content for support and advice on a wide range of topics relating to fertility and fertility health
- Prescription costs covered for colleagues taking hormone replacement therapy (HRT)
- Partnership with Carers UK to provide colleagues with free information, advice and tools to help manage caring responsibilities
- Inclusive environment with opportunities to join our Business Resource Groups, including: Pride Alliance, disAbility Alliance, Race Ethnicity & Cultural Heritage and more
- Cycle to Work scheme

¹ GRI 401-2 is within Deloitte LLP's review scope as detailed on pages 85-91.

Health and Safety

GRI 3-3, 401-2, 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 416-1¹, 416-2, 417-1

Colleague Safety

The Boots Group is committed to conducting its business operations with the utmost concern for the health and safety of all colleagues, customers, business partners, contractors and the general public. A safe work environment is a shared responsibility of The Boots Group and each colleague, and this is reinforced in our [ESG Policy Statements](#).

We advance this commitment through taking action to reduce retail crime, leveraging automation and technology to mitigate operational risks and strengthening partnerships with law enforcement and government bodies. These efforts are supported by local health and safety policies and robust data tracking at a country level, alongside comprehensive colleague training, ensuring that safety remains embedded in every aspect of our operations.

Patient Safety: Pharmacy Dispensing

As a dispensing and distributing pharmacy, patient safety is central to how we manage our pharmacy operations. We strive to be the industry leader in this area,

continuously enhancing our processes to minimise patient risk across the business. In the UK, 30.9% of our FY2025 sales revenue came from the sale and distribution of prescription medications and pharmacy-related services, with this figure being 13% in Ireland, 10% in Thailand and 4% in Mexico. This means that millions of customers and patients depend on us to safely dispense medications. All our pharmacy dispensing businesses annually review and evaluate pharmacy operations for compliance with our internal Pharmacy Operations Governance Policy.

Our robust pharmacy systems are specifically designed for the safe dispensing of medications and feature standardised dispensing processes detailing every step, from prescription receipt through to consultation and dispensing of the medication. These systems include multiple digital safety checks, such as barcode scanning, safety-enhancing automation and digital safety alerts utilising cutting-edge technology.

To further ensure patient safety, our prescription labels are designed to comply with both applicable regulatory requirements and our own

internal standards. This includes attaching descriptions of medications to each dispensed prescription, which is accompanied by a leaflet informing patients of the medication's name and use, potential adverse reactions, drug interactions, safe disposal and other relevant health information. Across The Boots Group, all businesses must have documented processes in place to support the collection of key performance indicators on health and safety, including pharmacy incidents.

To uphold a long-standing patient safety culture, performance is supported by systems that include Continuous Quality Improvement (CQI) programmes and monitoring to reduce and prevent incidents. Colleagues are empowered to report all pharmacy incidents, near misses and safety opportunities. We continuously evaluate multiple safety data sources and analysis results to develop ongoing colleague activities, training and solutions for process, system and physical environment improvements.

¹ GRI 416-1 is within Deloitte LLP's review scope as detailed on pages 85-91.



Product Safety

GRI 403-2, 416-1, 417-1, 417-2, 417-3

Product safety is the foundation of our commitment to our customers and patients. For our owned-brand products, spanning health, beauty, home, wellness, food and other categories, we are committed to undertaking a rigorous analysis for compliance with applicable laws, regulations and our own high standards for performance, safety and quality.

We engage a third-party product testing laboratory to rigorously validate the safety and quality of our owned-brand products before they reach customers and patients. We regularly and proactively seek feedback on our products and services and ensure that we address incidents in which we have failed to meet our own high standards or customers' needs and expectations.

For further guidance on how to share feedback, please see the [Boots website](#).

We maintain safety throughout the product lifecycle through an established testing programme. This programme requires periodic testing by independent third-party laboratories to validate quality, safety and compliance with regulatory standards, including analytical, performance, flammability and claim validation (labelling) tests.

Our suppliers are required to implement best practices, including clearly defined and well-documented good manufacturing and quality processes. Through our rigorous supplier qualification and factory assessment process, we evaluate our suppliers' ability to consistently deliver safe and quality products. We also reserve the right to audit product-manufacturing sites in non-regulated categories.

Our quality team ensures that customer feedback is actively reviewed and analysed. Should an issue arise with one of our products, our quality incident process is activated to systematically investigate, take corrective action and,



when necessary, quickly withdraw the product from all retail and e-commerce platforms. Where a product must be withdrawn from the market, we ensure it is not sold by issuing a lock on the product at our distribution centres, at the point of sale in the stores and online. [We also provide information on any recalled owned-brand products.](#)



Information Security

GRI 3-3, 418-1

Risk Management and Strategy

Safeguarding sensitive information and maintaining operational resilience against cybersecurity threats are critical business imperatives. As part of our overall risk management strategy, we employ a multi-layered three lines-of-defence model to protect The Boots Group against cybersecurity risks and incidents.

The Chief Information Officer (CIO) retains the primary, first-line responsibility for protecting The Boots Group against cybersecurity-related threats, including the evaluation of potential threats and the determination of appropriate responses. Reporting to the CIO, the Chief Information Security Officer (CISO) is the executive responsible for the development, continuous monitoring and enhancement of our Information Security programme. This programme is aligned with industry best practices, such as the National Institute of Standards and Technology Cybersecurity Framework, providing strategic oversight for cybersecurity controls for company technology, identifying risks within our supplier ecosystem,

and coordinating threat intelligence and incident response for current and emerging cybersecurity threats.

The Information Security programme is regularly updated by the CISO and the CIO, who ensure it aligns with regulatory requirements and industry best practices. This supports our commitment to ensure that our training initiatives relating to cybersecurity risks remain robust and as up-to-date as possible. We make it a priority to ensure that new colleagues receive training across a variety of issues, including security and privacy, highlighting our proactive and all-encompassing approach to information security across our organisation.

The CISO collaborates closely with Legal, Privacy, and Risk teams to ensure policy design and domain expertise regarding incident response are coordinated. The CISO's updates to the risk management strategy and policy incorporate real-time operating metrics from The Boots Group's technology environment, industry knowledge from colleagues and consultants, insights from professional peer networks, internal and external auditors, membership in information sharing and analysis centres and



commercial threat intelligence. In addition, the CISO regularly briefs the CIO and the executive committee on emerging threats.

Enhancing Cybersecurity Management

We continuously develop our cybersecurity framework to address the latest threats to our business and our stakeholders. A key component of our strategy is our partnership with industry leader, Palo Alto Networks. This collaboration ensures we maintain real-time threat intelligence, allowing us to deploy proactive safeguards that strengthen our security infrastructure and protect our customers and patients.

In FY2025, we continued to build on the dedicated, autonomous security services team established over the last

three years. We have strengthened our security posture by delivering enhanced authentication controls, including full migration to multi-factor authentication (MFA) for our colleagues and customers.

Our processes for vulnerability management and threat intelligence position us well to apply critical patching to protect our estate and take timely action against known threats. Recognising that security is a shared challenge, we actively share experiences with other retailers to better address common concerns and issues collectively. We also continue to work with our suppliers to improve security controls throughout our supply chain. These measures are fundamental to enhancing our resilience and protecting the data of our customers and patients.

Information Security continued

Incident Response

When dealing with cybersecurity incidents that arise across the business, The Boots Group implements a comprehensive plan, which formalises how we identify, investigate, respond to and report incidents involving unauthorised access to sensitive data. The plan is co-managed by the CISO and the Director of Compliance and Privacy. The plan not only ensures that there is a repeatable process for incident identification, but also determines the relative significance of these incidents, and defines internal and external reporting obligations. Respective response strategies are tailored to the technical, legal, business and regulatory circumstances of each incident. Once incidents are properly identified and assessed under the plan, communications are coordinated internally and escalated accordingly to the Audit Committee to facilitate the timely dissemination of accurate information while adhering to regulatory requirements.

Additionally, we engage outside experts as needed to supplement in-house capabilities for incident response and recovery, digital forensics, penetration testing and

specialised cybersecurity counsel. We proactively manage risks arising from third-party providers by conducting due diligence on the information security programmes of certain service providers, ensuring they meet our baseline cybersecurity standards as determined by the CISO under the Information Security programme.

In evaluating cybersecurity incidents, management considers the potential impact on customer privacy, our operations, controls and financial condition, as well as any potential



impact on The Boots Group's business strategy or reputation.

In FY2025, The Boots Group maintained excellent operational continuity, experiencing no material outages of our core internal platforms. Service interruptions were consistent with those affecting the broader retail sector, including intermittent disruptions caused by global service providers. Our robust monitoring and business continuity processes ensure we remain resilient in managing these external dependencies.

While we are not aware of any ongoing material risks from past or current cybersecurity threats that have or may materially affect our operations in our key markets, we recognise that future threats could materially impact our business strategy, results of operations or financial condition.

Governance

The Audit Committee receives briefings at least quarterly from the CISO pertaining to ongoing cybersecurity-related initiatives, risks and emerging threats. The Audit Committee also annually reviews and discusses with management the



enterprise risk assessment and key enterprise risks in relation to the broader risk management programme, including topics on information security, technology risks and cybersecurity.

Patient and Customer Data Privacy

GRI 3-3, 418-1¹

We respect the privacy of our customers and patients and we are committed to complying with leading data protection standards.

Our approach is built on a foundation of transparency, robust governance and comprehensive compliance with applicable data protection laws and standards. Our Privacy team oversees the privacy of patient, customer and colleague data across The Boots Group, with the Audit Committee providing dedicated oversight. We conduct privacy impact assessments regularly.

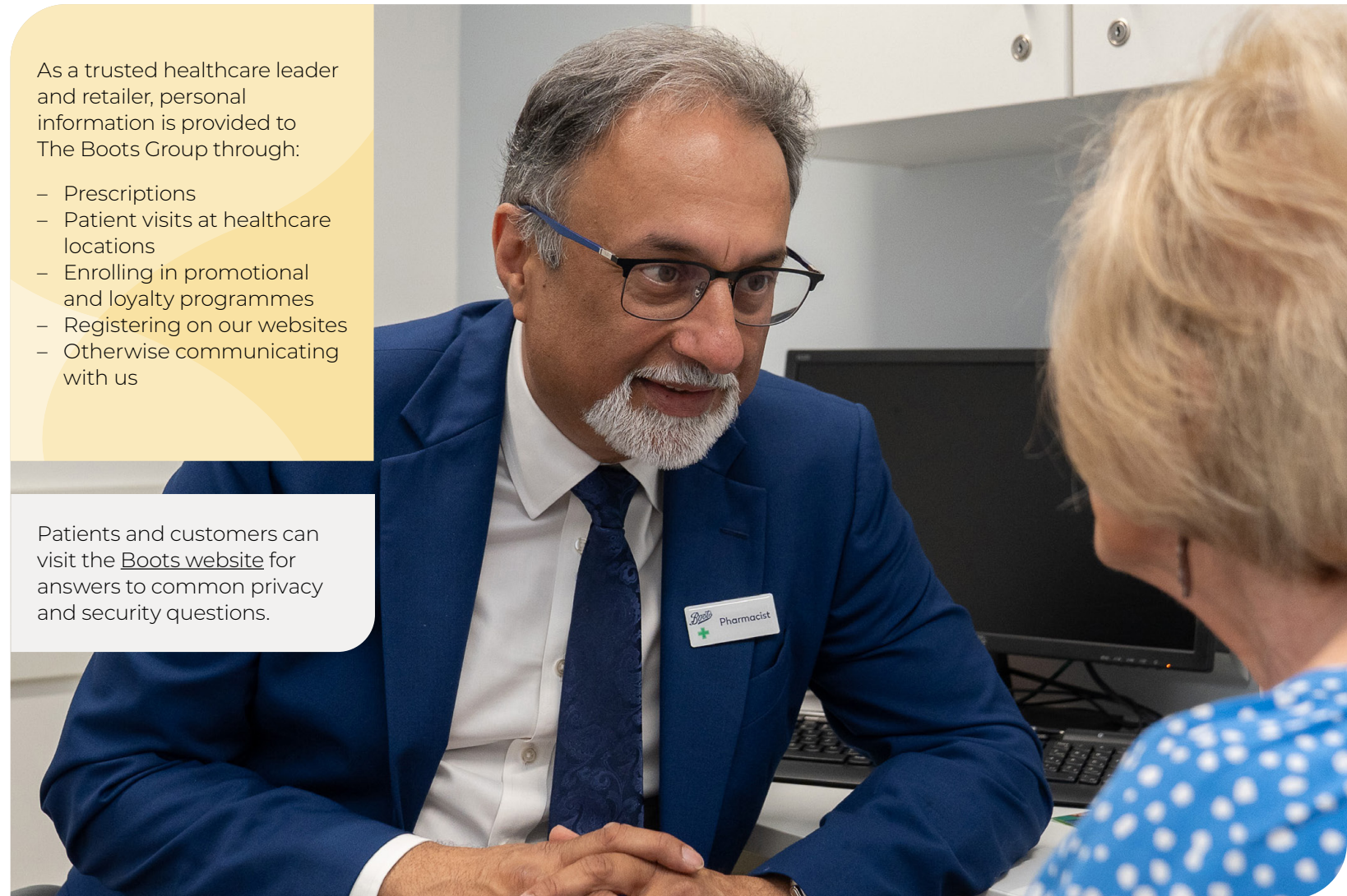
We believe in being transparent with our customers and patients about how their data is used. Our privacy policies are published on our websites, providing clear information on data usage and the safeguards we have in place. These policies also outline the rights of individuals regarding the use and deletion of their personal information in the jurisdictions where we operate.

The Boots Group is committed to complying with applicable data protection laws, including in the European Union and the UK.

As a trusted healthcare leader and retailer, personal information is provided to The Boots Group through:

- Prescriptions
- Patient visits at healthcare locations
- Enrolling in promotional and loyalty programmes
- Registering on our websites
- Otherwise communicating with us

Patients and customers can visit the [Boots website](#) for answers to common privacy and security questions.



¹ GRI 418-1 is within Deloitte LLP's review scope as detailed on pages 85-91.

7 Additional Information



GRI Content Index

The Boots Group continues to align its ESG reporting to the Global Reporting Initiative Sustainable Reporting Standards (GRI Standards).

This ESG Technical Report 2025 has been prepared in accordance with the GRI Standards: GRI 1 Foundation 2021, GRI 2 General Disclosures 2021 and GRI 3 Material Topics 2021. This GRI Content Index reflects the material ESG topics that emerged in our most recent complete ESG materiality assessment, which was concluded during FY2023.

GRI Disclosure		References and responses
GRI 1: Foundation 2021		
Reporting Principles and Requirements		Our ESG Strategy; page 7
GENERAL DISCLOSURES		
GRI 2: General Disclosures 2021		
The organisation and its reporting practices		
2-1	Organisational details	The Boots Group at a Glance; Impact Report page 5 , Technical Report page 6
2-2	Entities included in the organisation's sustainability reporting	The Boots Group at a Glance (list of entities); Impact Report page 5 , Technical Report page 6 About This Report; page 3 Basis of Presentation; page 89 Governance; page 30
2-3	Reporting period, frequency and contact point	About This Report; page 3 Stakeholder Engagement; pages 9-11
2-4	Restatements of information	Direct Response: We did not make any restatements of information during the reporting period.

GRI Content Index continued

GRI Disclosure		References and responses
2-5	External assurance	About This Report; page 3 Assurance Report; pages 85-86
Activities and workers		
2-6	Activities, value chain and other business relationships	The Boots Group at a Glance (for active sectors & products); Impact Report page 5 , Technical Report page 6 Sustainable Marketplace (for description of value chain); Impact Report page 57 Stakeholder Engagement (for business relationships); pages 9-11 Governance; page 30
2-7	Employees	Management Approach (Healthy and Inclusive Workplace); page 16 Demographic of Workforce; page 17
2-8	Workers who are not employees	Direct response: At the end of FY2025, we had 5,026 non-employee workers. Most of these non-employee workers are in the areas of IT and accounting. We have contracts with consulting services who directly employ these workers.
Governance		
2-9	Governance structure and composition	Governance; page 30 Corporate Governance and Risk Management; pages 31-32 Direct Response: Given its recent formation, The Boots Group intends to report on its new corporate governance framework in its FY2026 annual report in line with the requirements of the Wates Principles and Walker Guidelines.
2-10	Nomination and selection of the highest governance body	Governance; page 30 Corporate Governance and Risk Management; pages 31-32 Direct Response: Given its recent formation, The Boots Group intends to report on its new corporate governance framework in its FY2026 annual report in line with the requirements of the Wates Principles and Walker Guidelines.
2-11	Chair of the highest governance body	Governance; page 30
2-12	Role of the highest governance body in overseeing the management of impacts	Governance; page 30 Corporate Governance and Risk Management; pages 31-32

GRI Content Index continued

GRI Disclosure		References and responses
2-13	Delegation of responsibility for managing impacts	Governance; page 30 Corporate Governance and Risk Management; pages 31-32
2-14	Role of the highest governance body in sustainability reporting	Corporate Governance and Risk Management; pages 31-32 ESG Committee Responsibilities; page 32
2-15	Conflicts of interest	<u>Code of Conduct and Ethics</u> Code of Conduct and Ethics; page 34
2-16	Communication of critical concerns	<u>Code of Conduct and Ethics</u> Code of Conduct and Ethics; page 34
2-17	Collective knowledge of the highest governance body	Corporate Governance and Risk Management; pages 31-32
2-18	Evaluation of the performance of the highest governance body	Corporate Governance and Risk Management; pages 31-32 Governance, page 30 Direct Response: Given its recent formation, The Boots Group intends to report on its new corporate governance framework in its FY2026 annual report in line with the requirements of the Wates Principles and Walker Guidelines.
2-19	Remuneration policies	Governance, page 30 Direct Response: Owing to the timing of the company's takeover by Sycamore, this report is being released prior to The Boots Group FY2026 annual report and therefore certain disclosures will be provided in The Boots Group FY2026 annual report.
2-20	Process to determine remuneration	Governance, page 30 Direct Response: Owing to the timing of the company's takeover by Sycamore, this report is being released prior to The Boots Group FY2026 annual report and therefore certain disclosures will be provided in The Boots Group FY2026 annual report.
2-21	Annual total compensation ratio	Direct Response: The Boots Group is not subject to mandatory pay ratio disclosure requirements under statute as an unlisted company. Certain disclosures will be provided in The Boots Group FY2026 annual report.

GRI Content Index continued

GRI Disclosure		References and responses
2-22	Statement on sustainable development strategy	Q&A with Ornella Barra, Chair of the Board of Directors and Chair of the ESG Committee; pages 4-5 Our ESG Strategy: page 7
Strategy, policies and practices		
2-23	Policy commitments	Management Approach (Sustainable Marketplace); page 20 Ethical Sourcing Standards; page 21 Corporate Governance and Risk Management: pages 31-32 Policies; page 33 <u>Code of Conduct and Ethics; page 34</u> Direct Response: The Boots Group does not have a policy regarding the precautionary principle or approach. We are involved with a number of externally developed initiatives, as listed in the Stakeholder Engagement section of this report.
2-24	Embedding policy commitments	Ethical Sourcing Standards; page 21 Corporate Governance and Risk Management; pages 31-32 Policies; page 33
2-25	Processes to remediate negative impacts	ESG Double Materiality; page 8 Direct response: The latest double materiality assessment was conducted in 2023 and looked ahead to the next several years. The scope of the materiality project, particularly during the interview and workshop stages, included consideration of areas where we have potentially negative impacts as well as activities creating positive results. We place importance on the provision of effective remedy wherever human rights impacts occur through The Boots Group-based grievance mechanisms. We encourage anyone who works for or on behalf of The Boots Group to speak up, without fear of retaliation, about any complaints or concerns they may have in relation to human rights. We expect our suppliers and business partners to make the same commitment. This is stated in our <u>Human Rights Policy Statement</u> and described on page 20. We commit to promoting a grievance mechanism for colleagues to raise complaints or concerns. We would never impede access to state-based judicial or non-judicial mechanisms for individuals or communities who feel their human rights have been impacted. Stakeholder feedback, particularly from patients and customers, is captured and tracked across the business. We acknowledge that the original materiality assessment was conducted while under Walgreens Boots Alliance, therefore the specific material topics may differ for The Boots Group. However, we still consider these material topics to be applicable to The Boots Group and are planning to introduce an updated materiality assessment specifically for The Boots Group.

GRI Content Indexcontinued

GRI Disclosure		References and responses
2-26	Mechanisms for seeking advice and raising concerns	Code of Conduct and Ethics; page 34
2-27	Compliance with laws and regulations	Direct Response: Relevant disclosures will be included in The Boots Group FY2026 annual report.
2-28	Membership of associations	Stakeholder Engagement; pages 9-11
2-29	Approach to stakeholder engagement	Stakeholder Engagement; pages 9-11
Stakeholder engagement		
2-30	Collective bargaining agreements	<p>Direct response: As of 31 August 2025, 22.9% of our employees across the globe were covered by collective bargaining agreements.</p> <p>The Boots Group respects and upholds the right of workers in conformity with local law to be members of trade unions of their own choosing and to bargain collectively, in accordance with the appropriate local laws. All businesses and corporate functions are required to keep up-to-date written policies defining the rights of each employee to trade union membership where statutorily or legally required, according to our internal human resources policy.</p>

GRI Content Indexcontinued

GRI Disclosure		References and responses
Material Topics		
GRI 3: Material Topics 2021		
3-1	Process to determine material topics	<p>ESG Double Materiality; page 8</p> <p>TCFD Index; pages 74-82</p> <p>Direct response: The latest double materiality assessment was conducted in 2023 and looked ahead to the next several years. The scope of the materiality project, particularly during the interview and workshop stages, included consideration of areas where we have potentially negative impacts as well as activities creating positive results. We acknowledge that the original materiality assessment was conducted while under the Walgreens Boots Alliance business, therefore the specific material topics may differ for The Boots Group. However, we still consider these material topics to be applicable and are planning to introduce an updated materiality assessment specifically for The Boots Group.</p>
3-2	List of material topics	<p>ESG Double Materiality; page 8</p> <p>Direct Response: We acknowledge that the original materiality assessment was conducted while under the Walgreens Boots Alliance business, therefore the specific material topics may differ for The Boots Group. However, we still consider these material topics to be applicable and are planning to introduce an updated materiality assessment specifically for The Boots Group.</p>

GRI Content Index continued

GRI Disclosure		References and responses
GRI 200 Economic Standards Series		
Economic performance		
GRI 3: Material Topics 2021		
3-3	Management of material topics	<p>The Boots Group at a Glance; Impact Report page 5, Technical Report page 6</p> <p>Our ESG Strategy; page 7</p> <p>Management Approach (Healthy Communities); page 13</p> <p>Management Approach (Sustainable Marketplace); page 20</p> <p>Management Approach (Healthy Planet); page 25</p> <p>TCFD Index; pages 74-82</p>
GRI 201: Economic Performance 2016		
201-1	Direct economic value generated and distributed	<p>The Boots Group at a Glance; Impact Report page 5, Technical Report page 6</p> <p>Community Investment; page 14</p> <p>Direct Response: We recognise the importance of compensation in attracting and retaining top talent. To meet our aim of offering competitive pay and benefits, the compensation department conducts an annual pay analysis against key roles.</p>
201-2	Financial implications and other risks and opportunities due to climate change	TCFD Index; pages 74-82
201-3	Defined benefit plan obligations and other retirement plans	<p>Direct Response: The retirement plans' liabilities vary by plan. In some cases a plan might be funded through a segregated plan trust or liabilities may not exist because a plan might not be a pension plan.</p> <p>For Boots UK, the participation rate is approximately 70%.</p>
201-4	Financial assistance received from government	Direct Response: There were no tax holidays or material tax credits received by The Boots Group entities during FY2025.

GRI Content Indexcontinued

GRI Disclosure		References and responses
Market presence		
GRI 3: Material Topics 2021		
3-3	Management of material topics	<p>The Boots Group at a Glance; Impact Report page 5, Technical Report page 6</p> <p>Our ESG Strategy; page 7</p> <p>ESG Double Materiality; page 8</p> <p>Stakeholder Engagement; pages 9-11</p> <p>Management Approach (Healthy and Inclusive Workplace); page 16</p>
GRI 202: Market Presence 2016		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	<p>Direct Response: Ratio of our standard entry-level hourly wage to local minimum wage varies depending on minimum wage standards by location.</p> <p>Standard entry level wage does not vary by gender. In addition, we strive to work with suppliers who maintain The Boots Group commitment to fair wages and hours for all workers.</p>
202-2	Proportion of senior management hired from the local community	<p>Direct Response: For Boots UK, as a pharmacy-led retailer operating in communities, we strive to employ senior management representative of the local communities we serve. “Local” is defined by country, as we operate across the world. Significant location of operation is based on sales.</p>

GRI Content Index continued

GRI Disclosure		References and responses
Indirect economic impacts		
GRI 3: Material Topics 2021		
3-3	Management of material topics	<p>The Boots Group at a Glance; Impact Report page 5, Technical Report page 6</p> <p>Our ESG Strategy; page 7</p> <p>ESG Double Materiality; page 8</p> <p>Stakeholder Engagement; pages 9-11</p> <p>Management Approach (Healthy Communities); page 13</p>
GRI 203: Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	<p>Management Approach (Healthy Communities); page 13</p> <p>Direct Response: The Boots Group has supported non-cash donations inclusive of product donations, volunteering time and volunteer events. The Boots Group product donation strategy enhances the company's efforts to support local communities while minimising waste. Instead of returning excess inventory to brands for disposal, The Boots Group donates products directly from stores and distribution centres to partner organisations. This includes non-perishable food, personal care items, The Boots Group owned brands and seasonal products. Boots UK and No7 Beauty Company have a long-standing partnership with The Hygiene Bank and have donated over 1.7 million products over the course of the six-year partnership.</p>
203-2	Significant indirect economic impacts	<p>Management Approach (Healthy Communities); page 13</p> <p>Direct Response: As one of the world's largest providers of pharmacy and other healthcare services, we leverage our deep understanding of community needs to drive meaningful improvements in healthcare access and affordability. Through the Pharmacy First scheme initiative with the NHS, Boots has provided more than 1.5 million consultations for minor ailments that previously required a GP visit, significantly improving healthcare accessibility and saving costs. Boots pharmacies provided 497,000 people with free checks through the Health MOT programme enabling earlier diagnosis and preventing future cardiovascular events, and reducing long-term strain on the NHS.</p>

GRI Content Indexcontinued

GRI Disclosure		References and responses
Anti-corruption		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 ESG Double Materiality; page 8 Management Approach (Sustainable Marketplace); page 20 Ethical Sourcing Standards; page 21 <u>Code of Conduct and Ethics</u> ; page 34
GRI 205: Anti-corruption 2016		
205-1	Operations assessed for risks related to corruption	Management Approach (Sustainable Marketplace); page 20 Policies; page 33 Direct Response: We require all colleagues to familiarise themselves and comply with the requirements of all internal policies, in addition to following our <u>Code of Conduct and Ethics</u> ; Ethical Trading Standards; standards for risk management, Environmental and Health and Safety; and all published internal controls relevant to their operational duties.

GRI Content Index continued

GRI Disclosure	References and responses
205-2 Communication and training about anti-corruption policies and procedures	<p>Policies; page 33</p> <p><u>Code of Conduct and Ethics</u>; page 34</p> <p>Direct Response: Our Code of Conduct and Ethics sets the standard of behaviour we expect from all of The Boots Group's officers, employees, any officers or employees of a business or company in which The Boots Group or any of its subsidiaries has a controlling interest and other parties acting on behalf of The Boots Group no matter where they are located in the world, such as consultants, agents, intermediaries or other representative.</p> <p>The Boots Group strives to maintain high ethical standards and requires its employees and others doing business with The Boots Group, to comply with all applicable anti-bribery and corruption laws and other regulations that prohibit bribery, solicitation of bribery and the payment of kickbacks. Each of The Boots Group businesses and corporate functions are accountable for implementation of the Company's policies on this matter, including ensuring ongoing, tailored communication for relevant employees. Each business and corporate function must also ensure that appropriate training is available to employees and associated persons whose roles involve risk related to this area. The Boots Group expects its suppliers to adopt responsible processes and practices and to meet the standards set out in the Code and applicable policies. It is The Boots Group policy to source from suppliers who can satisfy our standards with regard to anti-corruption. Sourcing responsibly is our approach to achieving these standards with suppliers. Any corrupt, improper or unethical behaviour in dealings with suppliers is prohibited and appropriate actions are taken in case of non-compliance.</p>
205-3 Confirmed incidents of corruption and actions taken	<p>Omission</p> <p>Part of Disclosure Omitted: Total number and nature of confirmed incidents of corruption; total number of confirmed incidents in which employees were dismissed or disciplined for corruption; total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.</p> <p>Reason for Omission: Business confidential.</p> <p>Explanation for Omission: Reasons for limiting disclosure include, but are not limited to, confidentiality.</p>

GRI Content Indexcontinued

GRI Disclosure		References and responses
Anti-competitive Behaviour		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 ESG Double Materiality; page 8 Stakeholder Engagement; pages 9-11 Management Approach (Sustainable Marketplace); page 20 Ethical Sourcing Standards; page 21 <u>Code of Conduct and Ethics</u> ; page 34
GRI 206: Anti-competitive Behaviour 2016		
206-1	Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	<u>Code of Conduct and Ethics</u> ; page 34 Policies; page 33 Management Approach (Sustainable Marketplace); page 20 Ethical Sourcing Standards; page 21 Direct Response: Relevant disclosures will be included in The Boots Group FY2026 annual report.

GRI Content Indexcontinued

GRI Disclosure		References and responses
GRI 300 Environmental Standards Series		
Materials		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 ESG Double Materiality; page 8 Stakeholder Engagement; pages 9-11 Management Approach (Healthy Planet); page 25 Management Approach (Sustainable Marketplace); page 20 Ethical Sourcing Standards; page 21 <u>Code of Conduct and Ethics</u> ; page 34
GRI 301: Materials 2016		
301-1	Materials used by weight or volume	Sustainable Packaging; page 23
301-2	Recycled input materials used	Sustainable Packaging; page 23 Direct response: We do not currently have the capabilities to track recycled material input outside of recycled plastic and wood input in the packaging of our Boots owned brands.
301-3	Reclaimed products and their packaging materials	Waste; page 28

GRI Content Index continued

GRI Disclosure		References and responses
Energy		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 Stakeholder Engagement; pages 9-11 Management Approach (Healthy Planet); page 25
GRI 301: Energy 2016		
302-1	Energy consumption within the organisation	Energy and Emissions; pages 26-27 GHG Climate Change Statement
302-2	Energy consumption outside of the organisation	Omission Part of Disclosure Omitted: Energy consumption outside of the organisation. Reason for Omission: Information unavailable. Explanation for Omission: The Boots Group does not have this information available for energy consumption outside of the organisation.
302-3	Energy intensity	Energy and Emissions; pages 26-27 GHG Climate Change Statement
302-4	Reduction of energy consumption	GHG Climate Change Statement
302-5	Reductions in energy requirements of products and services	Omission We do not currently have the capabilities to track reductions in energy requirements of sold products and services achieved during the reporting period.

GRI Content Index continued

GRI Disclosure		References and responses
Emissions		
GRI 3: Material Topics 2021		
3-3	Evaluation of the management approach	Our ESG Strategy; page 7 Stakeholder Engagement; pages 9-11 Management Approach (Healthy Planet); page 25
GRI 305: Emissions 2016		
305-1	Direct (Scope 1) GHG emissions	Energy and Emissions; pages 26-27 Direct Response: CO ₂ is the only gas that we currently report. We believe that hydrofluorocarbons (HFCs) may be material to The Boots Group we are implementing processes that will allow for reporting on HFCs in future reports. Source of the emission factors and the global warming potential (GWP) rate used: AR6 Emission Factors; UK Department for Environment, Food & Rural Affairs (DEFRA); and International Energy Agency (IEA).
305-2	Indirect (Scope 2) GHG emissions	Energy and Emissions; pages 26-27 Direct Response: CO ₂ is the only gas that we currently report. We believe that hydrofluorocarbons (HFCs) may be material to The Boots Group and we are implementing processes that will allow for reporting on HFCs in future reports. Source of the emission factors and the global warming potential (GWP) rate used: AR6 Emission Factors; UK Department for Environment, Food & Rural Affairs (DEFRA); and International Energy Agency (IEA).
305-3	Other indirect (Scope 3) GHG emissions	Energy and Emissions; pages 26-27 Direct Response: CO ₂ is the only gas that we currently report. We believe that hydrofluorocarbons (HFCs) may be material to The Boots Group and we are implementing processes that will allow for reporting on HFCs in future reports. Source of the emission factors and the global warming potential (GWP) rate used: AR6 Emission Factors; UK Department for Environment, Food & Rural Affairs (DEFRA); and International Energy Agency (IEA).
305-4	GHG emissions intensity	Energy and Emissions; pages 26-27 Direct Response: CO ₂ is the only gas that we currently report. We believe that hydrofluorocarbons (HFCs) may be material to The Boots Group and we are implementing processes that will allow for reporting on HFCs in future reports. Source of the emission factors and the global warming potential (GWP) rate used: AR6 Emission Factors; UK Department for Environment, Food & Rural Affairs (DEFRA); and International Energy Agency (IEA).



GRI Content Index continued

GRI Disclosure		References and responses
305-5	Reduction of GHG emissions	<p>Energy and Emissions; pages 26-27</p> <p>Direct response: GHG emissions are reported in metric tonnes of carbon dioxide equivalents (CO₂e) and include three of the seven GHGs covered by the Kyoto Protocol: carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O). The only material gas for The Boots Group is CO₂. The following three greenhouse gases were omitted from our reporting as they are not a material source of greenhouse gases for the business: perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃). We believe that hydrofluorocarbons (HFCs) may be material to The Boots Group as they are used within refrigeration and cooling. We are implementing processes that will allow reporting on HFCs in future reporting if material.</p>
305-6	Emissions of ozone-depleting substances (ODS)	<p>Direct response: Trichlorofluoromethane (CFC-11) is not applicable to our business operations. We therefore do not track this.</p>
305-7	Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions	<p>Direct response: Nitrogen oxides (NOx) and sulphur oxides (SOx) are not material to our business operations. We therefore do not track this.</p>

GRI Content Index continued

GRI Disclosure		References and responses
Effluents and waste		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy: page 7 Stakeholder Engagement; pages 9-11 Management Approach (Healthy Planet); page 25
GRI 306: Effluents and Waste 2020		
306-1	Waste generation and significant waste-related impacts	Sustainable Packaging; page 23 Waste; page 28
306-2	Management of significant waste-related impacts	Waste; page 28 Sustainable Packaging; page 23 Direct Response: The Boots Group is involved in the following initiatives and partnerships to prevent waste generation throughout its value chain, PenCycle, Recycle at Boots, Olio partnership, Boots Opticians reducing waste and Boots' partnership with The Hygiene Bank. More information on the above initiatives and partnerships can be found in the ESG Impact Report 2025 pages 26, 70, 71, 72.
306-3	Waste generated	Waste; page 28 Sustainable Packaging; page 23
306-4	Waste diverted from disposal	Omission GRI 306-4 (b), (c), and (d) have been omitted as hazardous waste as not material in FY2025.
306-5	Waste directed to disposal	Omission GRI 306-5 (b), (c), and (d) have been omitted as hazardous waste as not material in FY2025.

GRI Content Index continued

GRI Disclosure		References and responses
Supplier environmental assessment		
GRI 3: Material Topics 2021		
3-3	Management of material topics	<p>The Boots Group at a Glance; Impact Report page 5, Technical Report page 6</p> <p>Our ESG Strategy; page 7</p> <p>Stakeholder Engagement; pages 9-11</p> <p>Management Approach (Healthy Planet); page 25</p> <p>Management Approach (Sustainable Marketplace); page 20</p>
GRI 308: Supplier Environmental Assessment 2016		
308-1	New suppliers that were screened using environmental criteria	<p>Ethical Sourcing Standards; page 21</p> <p>Sustainable Packaging; page 23</p>
308-2	Negative environmental impacts in the supply chain and actions taken	<p>Ethical Sourcing Standards; page 21</p> <p>Sustainable Packaging; page 23</p> <p>Direct Response: No zero tolerance violations were detected during FY2025. For sites with critical issues, suppliers have been required to develop and implement immediate remedial action plans to address identified non-compliance. Verification of actions taken are monitored via submission of appropriate evidence and through on-site reassessment.</p>

GRI Content Indexcontinued

GRI Disclosure		References and responses
GRI 400 Social Standards Series		
Employment		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 ESG Double Materiality; page 8 Stakeholder Engagement; pages 9-11 Management Approach (Healthy and Inclusive Workplace); page 16
GRI 401: Employment 2016		
401-1	New employee hires and employee turnover	Management Approach (Healthy and Inclusive Workplace); page 16 Employee Type, Turnover and Parental Leave; page 18
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Health and Safety; page 36 Colleague Health and Wellbeing; page 35
401-3	Parental leave	Employee Type, Turnover and Parental Leave; page 18

GRI Content Indexcontinued

GRI Disclosure		References and responses
Occupational health and safety		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 ESG Double Materiality; page 8 Stakeholder Engagement; pages 9-11 Management Approach (Healthy and Inclusive Workplace); page 16
GRI 403: Occupational Health and Safety 2018		
403-1	Occupational health and safety management system	Governance; page 30 Health and Safety; page 36
403-2	Hazard identification, risk assessment and incident investigation	Corporate Governance and Risk Management; page 31 Health and Safety; page 36 Product Safety; page 37 Direct Response: Every one of The Boots Group businesses and corporate functions designates a responsible person to hold specific responsibility for management of all health, safety and environmental matters in its operations. The director must ensure that ongoing comprehensive risk assessments are carried out on all work-related activities that carry health, safety and environmental risks and that all mitigating controls required by these assessments are implemented promptly as appropriate. Each business and corporate function must have written, fit-for-purpose health, safety and environmental standards — informed by local legislative requirements — that cover the areas of risk relevant to its operations as well as a compliance programme that includes regular health, safety and environmental audits. Every business must have in place processes for investigating accidents and near misses to help ensure that the root causes of health, safety and environmental incidents are fully identified and addressed. In addition to internal investigative processes, primary authorities in the UK, are consulted on health and safety and environmental matters, for which they may provide assured advice. As outlined in employee handbooks, policies and contracts of employment, all employees, agency staff, consultants and onsite contractors must engage fully in the management of health, safety and environmental matters of businesses and corporate functions. Any concerns about misconduct or hazardous conditions that may threaten workplace safety should always be reported. The Boots Group does not tolerate retaliation against anyone who raises a legal or ethical concern, reports misconduct in good faith or participates in an investigation.

GRI Content Index continued

GRI Disclosure		References and responses
403-3	Occupational health services	<p>Health and Safety; page 36</p> <p>Direct Response: Every one of The Boots Group businesses and corporate functions must designate a director from its management or operating committee to hold specific responsibility for management of all health, safety and environmental matters in its operations. The director must ensure that ongoing comprehensive risk assessments are carried out on all work-related activities that carry health, safety and environmental risks and that all mitigating controls required by these assessments are implemented promptly as appropriate. Each business and corporate function must have written, fit-for-purpose health, safety and environmental standards — informed by local legislative requirements — that cover the areas of risk relevant to its operations as well as a compliance programme that includes regular health, safety and environmental audits. Every business must have in place processes for investigating accidents and near misses to help ensure that the root causes of health, safety and environmental incidents are fully identified and addressed. In addition to internal investigative processes, primary authorities in the UK, are consulted on health and safety and environmental matters, for which they may provide assured advice. As outlined in employee handbooks, policies and contracts of employment, all employees, agency staff, consultants and onsite contractors must engage fully in the management of health, safety and environmental matters of businesses and corporate functions. Any concerns about misconduct or hazardous conditions that may threaten workplace safety should always be reported. The Boots Group does not tolerate retaliation against anyone who raises a legal or ethical concern, reports misconduct in good faith or participates in an investigation.</p>
403-4	Worker participation, consultation and communication on occupational health and safety	<p>Health and Safety; page 36</p> <p>Direct Response: To maintain a safe and productive work environment, we provide various channels for colleagues across our businesses to voice their questions or concerns. These include reaching out to management, using a speak-up confidential hotline, submitting an online report, contacting the Compliance Officer or department or getting in touch with human resources.</p>
403-5	Worker training on occupational health and safety	<p>Health and Safety; page 36</p> <p>Direct response: The Boots Group continuously seeks ways to prioritise safety measures and enhance educational training programmes. We encourage open dialogue and constructive feedback from all stakeholders, including colleagues, to ensure best practices.</p>
403-6	Promotion of worker health	<p>Health and Safety; page 36</p> <p>Direct Response: For a full list of our benefits please see: https://www.boots.jobs/why-boots/rewards-benefits/</p>

GRI Content Indexcontinued

GRI Disclosure		References and responses
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	<p>Health and Safety; page 36</p> <p>Ethical Sourcing Standards; page 21</p>
403-8	Workers covered by an occupational health and safety management system	<p>Direct response: The Boots Group has implemented key elements of a health, safety and environmental system in all markets covering all employees. Safety management systems and internal and external auditing processes are in place in several larger markets covering all employees.</p> <p>Omission GRI 403-8 (a)(i) and (a)(ii).</p> <p>Part of Disclosure Omitted: Workers who are not employees and an annual internal or external audit process of the management system.</p> <p>Reason for Omission: Information unavailable.</p> <p>Explanation for Omission: Safety arrangements are commonly in place but are not always structured as recognised safety management systems and in at least one market they do not always cover non-employee workers. An annual internal and external audit process of the management system is not applied across all markets. Systems and approaches are evolving in some markets. Legal agreements limit and exclude certain responsibilities for record keeping or annual training in some markets.</p>

GRI Content Indexcontinued

GRI Disclosure		References and responses
Training and education		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Stakeholder Engagement; pages 9-11 Management Approach (Healthy and Inclusive Workplace); page 16
GRI 404: Training and Education 2016		
404-1	Average hours of training per year per employee	Direct Response: Boots UK full-time equivalent employees received an average of eight hours of training per person. Omission Part of Disclosure Omitted: Employee category. Reason for Omission: Information unavailable.
404-2	Programmes for upgrading employee skills and transition assistance programmes	Direct Response: At The Boots Group, we believe that investing in our people is key to our collective success. We are committed to fostering a culture of continuous learning and development, providing our colleagues with the tools and resources they need to thrive in their roles and reach their full potential. This commitment is reflected in our robust training programmes, offered across our organisation — from our stores and distribution centres to our support offices. During FY2025, Boots UK colleagues received an average of eight hours of training per person. As part of our mandated trainings, all colleagues are required to complete harassment prevention training that complies with relevant state and local laws. Boots and No7 Beauty Company use ‘Our Behaviours’ — a guide framework designed to provide the consistency and focus required to drive business performance, execute strategy and build a positive culture. Boots and No7 Beauty Company encourage leaders to collect feedback on their colleagues throughout the year, including during Connect conversations, which occur throughout the fiscal year and before year-end performance reviews. Colleagues and their managers can use the anytime feedback tool in the performance management system to seek and receive feedback. Part of Disclosure Omitted: Other benefits available to employees as standard are considered immaterial for The Boots Group and have therefore not been disclosed.
404-3	Percentage of employees receiving regular performance and career development reviews	Direct Response: All managers across The Boots Group are encouraged to have developmental conversations with their direct reports. Manager refers to employees with at least one direct report.

GRI Content Indexcontinued

GRI Disclosure		References and responses
Diversity and equal opportunity		
GRI 103: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 ESG Double Materiality; page 8 Stakeholder Engagement; pages 9-11 Management Approach (Healthy and Inclusive Workplace); page 16
405-1	Diversity of governance bodies and employees	Corporate Governance and Risk Management; page 31 Employee Type, Turnover and Parental Leave; page 18
405-2	Ratio of basic salary and remuneration of women to men	Direct Response: In the UK, our businesses that are subject to the government's gender pay gap regulations publish annual reports. During FY2025, Boots UK published its eighth Gender Pay Gap Report reflecting the period ending April 2025, which included actions taken toward further reducing the pay gap, encouraging and supporting female colleagues across the organisation and inspiring everyone to reach their full potential. This report showed a median gender pay gap of 0.6%. Boots continues to remain well ahead of the median national average and is continuing to drive initiatives to maintain progress in this area.

GRI Content Index continued

GRI Disclosure		References and responses
Local communities		
GRI 103: Management Approach 2016		
3-3	Management of material topics	<p>Our ESG Strategy; page 7</p> <p>ESG Double Materiality; page 8</p> <p>Stakeholder Engagement; pages 9-11</p> <p>Management Approach (Healthy Communities); page 13</p> <p>Direct Response: For all our major programmes we conduct regular analyses to review our methods, activities, impact and return on resource investment. Based on these reviews, we decide to continue, modify or discontinue programmes. Community engagement is reviewed in aggregate by operating businesses quarterly to determine alignment with our ESG Strategy.</p>
GRI 413: Local Communities 2016		
413-1	Operations with local community engagement, impact assessments and development programmes	<p>Management Approach (Healthy Communities); page 13</p> <p>Community Investment; page 14</p> <p>Ethical Sourcing Standards; page 21</p> <p>Waste; page 28</p> <p>Direct Response: Substantially all of our operations have implemented local community engagement. The Boots Group ESG framework gives our businesses the flexibility to engage with local communities based on the relevant social, environmental and economic context. Our businesses engage with local and national organisations that share our purpose, values and ethics in order to understand where they can have the biggest impact. Engagement channels differ from business to business. Impact assessments are generally conducted for key national ESG programmes and are delivered jointly with the partnering organisation. Many programmes have impacts felt on national or global levels, but they are enacted most thoughtfully in the communities we serve. In the UK, Boots works with long-term national partners to support local communities. The Boots Group provides opportunities for any of its customers and patients to give feedback and to raise grievances through online or telephonic mechanisms. This would provide opportunities for local grievances to be addressed.</p>
413-2	Operations with significant actual and potential negative impacts on local communities	<p>Direct Response: Based on our sector, this is not relevant to our business. We are creating economic opportunity and access to essential products and services.</p>

GRI Content Indexcontinued

GRI Disclosure		References and responses
Supplier social assessment		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 ESG Double Materiality; page 8 Management Approach (Sustainable Marketplace); page 20
GRI 414: Supplier Social Assessment 2016		
414-1	New suppliers that were screened using social criteria	Ethical Sourcing Standards; page 21 Direct Response: The Boots Group assesses 100% of its owned-brand suppliers.
414-2	Negative social impacts in the supply chain and actions taken	Ethical Sourcing Standards; page 21 <u>Modern Day Slavery and Human Trafficking Statement</u> Omission GRI 414-2 (b), (c), (d), (e) have been omitted as no significant actual or potential negative social impacts have been identified in FY2025.
Public policy		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 ESG Double Materiality; page 8
GRI 415: Public Policy 2016		
415-1	Political contributions	Direct Response: No political contributions were made by The Boots Group entities during FY2025.

GRI Content Indexcontinued

GRI Disclosure		References and responses
Customer health and safety		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 ESG Double Materiality; page 8 Stakeholder Engagement; pages 9-11 Health and Safety; page 36 Management Approach (Sustainable Marketplace); page 20
GRI 416: Customer Health and Safety 2016		
416-1	Assessment of the health and safety impacts of product and service categories	Health and Safety; page 36 Product Safety; page 37
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Health and Safety; page 36

GRI Content Indexcontinued

GRI Disclosure		References and responses
Marketing and labelling		
GRI 103: Management Approach 2016		
3-3	Management of material topics	Our ESG Strategy; page 7 Stakeholder Engagement; pages 9-11 Management Approach (Healthy Planet); page 25 ESG Double Materiality; page 8
GRI 417: Marketing and Labelling 2016		
417-1	Requirements for product and service information and labelling	Health and Safety; page 36 Product Safety; page 37 Waste; page 28
417-2	Incidents of non-compliance concerning product and service information and labelling	Product Safety; page 37 Direct response: The Boots Group has not identified any incidents of non-compliance with regulations or voluntary codes in FY2025.
417-3	Incidents of non-compliance concerning marketing communications	Product Safety; page 37 Direct response: The Boots Group has not identified any material incidents of non-compliance with regulations or voluntary codes in FY2025.

GRI Content Indexcontinued

GRI Disclosure		References and responses
Customer privacy		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 Stakeholder Engagement; pages 9-11 Information Security; page 38 Patient and Customer Data Privacy; page 40
GRI 418: Customer Privacy 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Information Security; page 38 Patient and Customer Data Privacy; page 40 Direct Response: We report any data breaches to the relevant data protection authorities when required by law. Omission GRI 418-1 (a) and (b) have been omitted due to a lack of available data.
Patient and consumer experience		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Q&A with Ornella Barra, Chair of the Board of Directors and Chair of the ESG Committee; pages 4-5 The Boots Group at a Glance; Impact Report page 5 , Technical Report page 6 Our ESG Strategy; page 7 Management Approach (Healthy Communities); page 13
Health equity, access and affordability		
GRI 3: Material Topics 2021		
3-3	Management of material topics	About This Report; page 3 Our ESG Strategy; page 7 Q&A with Ornella Barra, Chair of the Board of Directors and Chair of the ESG Committee; pages 4-5 Management Approach (Healthy Communities); page 13

GRI Content Indexcontinued

GRI Disclosure		References and responses
Public health outcomes improvement		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 Q&A with Ornella Barra, Chair of the Board of Directors and Chair of the ESG Committee; pages 4-5 Management Approach (Healthy Communities); page 13 Community Investment; page 14
Innovation and digitalisation		
GRI 3: Material Topics 2021		
3-3	Management of material topics	Our ESG Strategy; page 7 Q&A with Ornella Barra, Chair of the Board of Directors and Chair of the and ESG Committee; pages 4-5 The Boots Group at a Glance; Impact Report page 5 , Technical Report page 6

SASB Index

Sustainability Accounting Standards Board (SASB) Standards are independent standards for ESG disclosures maintained by the International Sustainability Standards Board (ISSB).

The SASB reporting standards are industry-specific, covering ESG reporting criteria for 77 industries to meet investor needs. The table below is The Boots Group SASB Index¹, which includes disclosures as part of the drug retailers industry, which includes companies that operate retail pharmacies and distribution centres that supply retail stores.

¹ Selected SASB metrics in the index below are included within the scope of Deloitte LLP review as detailed in the Assurance Report on pages 85-91.

Drug Retailers Standard				
Topic	Metric	Category	Code	Response
Accounting Metrics (as of 31 August 2025)				
Energy Management in Retail	(1) Total energy consumed	Quantitative	HC-DR-130a.1	(1) 1,524,707 GJ
	(2) Percentage grid electricity			(2) 72%
	(3) Percentage renewable			(3) 4%

SASB Index continued

Drug Retailers Standard				
Topic	Metric	Category	Code	Response
Data Security and Privacy	Description of policies and practices to secure customers' protected (PHI) records and other personally identifiable information (PII)	Discussion and analysis	HC-DR-230a.1	See Patient and Customer Data Privacy; page 40
Patient Health Outcomes	Description of policies and practices to prevent prescription dispensing errors	Discussion and analysis	HC-DR-260b.2	See Health and Safety; page 36
Accounting Metrics (as of 31 August 2025)				
Activity Metrics	Number of pharmacy locations	Quantitative	HC-DR-000.A	Over 3,150 pharmacy locations.
	Total area of retail space	Quantitative	HC-DR-000.B	Retail space of 1.9 million square metres.
	Number of prescriptions filled	Quantitative	HC-DR-000.C	Over 200 million prescription items dispensed by The Boots Group in FY2025, including Boots UK, Boots Ireland and Farmacias Benavides in Mexico.
	Number of pharmacists	Quantitative	HC-DR-000.D	The Boots Group has over 5,400 registered pharmacists.

TCFD Index

GRI 3-1, 3-3, 201-2

The Boots Group reports against the Task Force on Climate-related Financial Disclosures (TCFD) as required in the UK. As a growing number of governments and regulating bodies have adopted or proposed new climate regulations, citing International Sustainability Standards Board (ISSB) as a leading framework, we will align to ISSB in future.

We are committed to increasing transparency and continuously improving our ESG-related disclosures as our stakeholders, including customers, patients and investors, are interested in our climate-related actions and goals.

Mitigation efforts to reduce our impact on the climate are focused on two primary initiatives: **1)** driving efficient operations and **2)** proactively engaging with stakeholders, including suppliers, with an emphasis on reducing energy consumption, emissions and waste, while increasing reuse and recycling options to help create a progressively circular economy.

The Boots Group conducts a materiality assessment at least every three years to understand its impacts, encourage insightful stakeholder

dialogue, inform its sustainability strategy and form the basis for its ESG reporting. Our 2023 double materiality assessment resulted in the topic of climate change resiliency as having very high significance to our stakeholders. As such, The Boots Group reports on climate-related risks and discusses strategy, goals and metrics in its annual ESG Report. We also complete the [CDP Climate Change questionnaire](#) on an annual basis, demonstrating our commitment to transparently reporting on our progress.

Our response aligns to our most recent [CDP Climate Change questionnaire](#), the emissions disclosures found in this [ESG Report 2025](#), and our [FY2022 climate scenario analysis \(CSA\)](#).

The Boots Group highlights in FY2025 include:

The Boots Group metrics and targets are presented below. Additionally, our principal businesses set targets as they comprise a large percentage of our overall emissions. In FY2025, Boots UK represents more than 57% of our Scope 1 and 2 carbon footprint.

- **The Boots Group:** reduce our absolute Scope 1 and Scope 2 emissions 30% by the end of FY2030 compared with our baseline year of FY2019. In FY2025, we exceeded the target, achieving 37.1% reduction compared to the baseline year.

- **Boots UK and No7 Beauty Company-owned brands:** reach The UK Plastics Pact 2025 targets: reduced plastic packaging compared with 2018, 100% of plastic packaging reusable or recyclable by consumers and achieve 30% average recycled content across plastic packaging.



More climate performance highlights can be found in the Climate Change Resiliency section of the [ESG Impact Report 2025](#) on pages 64-68.

TCFD Index continued

Disclosure Focus Area	Recommended Disclosures	Response
Governance		
Disclose the organisation's governance around climate-related risks and opportunities.	a) Describe the board's oversight of climate-related risks and opportunities.	See Governance; pages 30-32
Governance		
	b) Describe management's role in assessing and managing climate-related risks and opportunities.	See Corporate Governance and Risk Management; pages 30-32

TCFD Index continued

Disclosure Focus Area	Recommended Disclosures	Response
Strategy		
Disclose the actual and potential impacts of climate-related risks and opportunities on the organisation's business, strategy and financial planning where such information is material.	Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term.	<p>Climate change presents a wide range of risks and opportunities to The Boots Group over the short, medium and long term. The risks identified below may have a material impact on business operations and financial performance.</p> <p>Physical risks, such as extreme weather conditions, rising sea levels or changes in precipitation patterns, may impact operations and facilities around the world by causing physical damage to stores, distribution or fulfillment centres, which may lead to loss or spoilage of inventory and business interruptions. Extreme weather conditions and variability in weather patterns may also result in supply chain disruptions and increased supplier costs that could negatively impact The Boots Group's ability to procure goods or services required for the operation of its business.</p> <p>Transition risks associated with the shift to a low-carbon economy may have an impact on The Boots Group operations, supply chain and access to capital. Uncertainty in energy prices and costs of fossil fuel-based goods (e.g. plastics) may increase costs throughout the supply chain in addition to The Boots Group operations. The Boots Group operations use natural gas, diesel fuel and petrol, and electricity, all of which could face increased regulation as a result of climate change or other environmental concerns. There are also transition risks associated with increasing regulations on GHG emissions and energy inputs which may increase costs associated with operations, compliance and merchandise.</p> <p>There are risks and opportunities associated with employees, customers and certain shareholders that may affect the public perception of The Boots Group by interested stakeholders. Additionally, if The Boots Group is not able to show progress on climate-related issues or is delayed or unable to meet goals on time (e.g. reducing GHG emissions), it could affect The Boots Group's ability to retain existing and attract new customers and employees. Beyond the risks described above, climate change may also present opportunities for The Boots Group to provide new health-related services and respond to increased demand for low-carbon products. By improving access to healthcare, The Boots Group has an opportunity to serve the needs of local communities experiencing severe weather conditions and other climate-related impacts. Worsening climate change conditions may increase the prevalence and severity of human health impacts (e.g. increased heat stress, new pathogens or vector-borne diseases) and The Boots Group may be able to invest in beneficial products and services such as telehealth, pharmacy services, retail product offerings and mobile vaccination clinics, to meet the needs of its customers.</p> <p>The Boots Group is continually evaluating relevant climate risks and opportunities and seeks to mitigate the impacts of these risks while also building capacity to realise opportunities.</p>

TCFD Index continued

Disclosure Focus Area	Recommended Disclosures	Response
Strategy		
	Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.	<p>Climate-related risks and opportunities have influenced and been incorporated into Group-wide objectives, strategies and goals. The Boots Group is focused on mitigating the impacts of climate change by reducing GHG emissions and reducing operating costs.</p> <p>The Boots Group is taking steps to improve the sustainability of its operations by prioritising energy conservation and efficiency at retail and distribution locations. Additionally, The Boots Group is building its resilience to climate risks while generating value for customers and ensuring business continuity in the face of weather and/or climate change impacts. The Boots Group has an opportunity to play a supportive role as communities transition within the changing climate.</p> <p>The Boots Group is increasingly offering products and services, health and other, that align with a low-carbon economy, help reduce its impact on the planet and help communities adapt to climate change.</p> <p>Climate-related risks and opportunities will continue to inform The Boots Group business strategy and financial planning. Through risk management, we evaluate climate-related risks to determine materiality for incorporation into the Group's broader risk management process. As The Boots Group looks to develop its business strategy aligned with a low-carbon future, it will use the results of its Climate Scenario Analysis (CSA) to make informed decisions about which risks and opportunities to prioritise.</p>

TCFD Index continued

Disclosure Focus Area	Recommended Disclosures	Response
Strategy		
	Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	<p>As part of The Boots Group commitment to building resilience into its business strategy, The Boots Group conducted a CSA to identify, prioritise and determine the potential impacts of climate-related risks and opportunities that could affect its business. The Boots Group took a cross-functional approach to the CSA by involving internal stakeholders from across the Group to identify 10 risks and opportunities most relevant to The Boots Group.</p> <p>Each identified risk and opportunity was analysed under two climate scenarios: a high-emissions scenario and a low-carbon economy scenario. Both scenarios were based on climate projections from the Intergovernmental Panel on Climate Change. The low-emissions scenario, also known as Representative Concentration Pathway (RCP) 2.6, is based on keeping global warming under 2°C and is modelled under the assumption that the world takes a sharp pivot toward climate action, including rapid decarbonisation. The high-emissions scenario is based on RCP 8.5, which would result in 4 to 5°C of warming by the end of the century. This scenario presents the upper bounds of impacts from global warming resulting from inaction on decarbonisation and climate-change mitigation.</p> <p>The results of this CSA show that physical risks will have a larger impact on The Boots Group business in the high-emissions scenario. In a high-emissions scenario, extreme weather conditions and other climate disasters would have a more significant impact on The Boots Group through store closures, lost sales, inventory spoilage and repair costs. Transition risks are more varied, however, with many of these risks having a larger impact on The Boots Group in the near term (i.e., by 2030) in a low-emissions scenario. These impacts are due to the added burden that would be required to address the rapid shift to a low-carbon economy. Climate-related opportunities are generally more pronounced in the high-emissions scenario, as larger impacts from climate change will lead to increased opportunities for The Boots Group to provide solutions that improve healthcare access and quality of services. As a result of this the strategy is considered resilient to the potential impacts of climate-related risks.</p>

TCFD Index continued

Disclosure Focus Area	Recommended Disclosures	Response
Risk Management		
Disclose how the organisation identifies, assesses and manages climate-related risks.	Describe the organisation's processes for identifying and assessing climate-related risks.	<p>For The Boots Group, climate-related risks are considered within the risk identification, assessment and management processes. The risk management functions are primarily responsible for monitoring the overall risk profile, which includes both climate-related physical and transition risks. We track current and emerging risks and recommend changes to the Group's key risk summary. At the Group level, risk assessments encompass all strategic, operational, commercial, regulatory, reputational, legal and financial risks that could have an adverse impact on The Boots Group. Climate-related risks can impact all of these risk types, and therefore have to be considered. Acute physical risks, such as flooding, have operational, commercial and financial implications. The Boots Group is committed to evaluating and monitoring acute physical risks to help ensure it is properly prepared and can help mitigate impact. Risks are identified and assessed for all businesses and functions. Each business is responsible for preparing and reviewing potential risks biannually.</p> <p>The Boots Group considers potential risks, including climate-related risks, to the Company and evaluates them based on the following criteria: (i) the importance of the issue to, and potential impact on, the business; (ii) the importance of the issue to, and potential impact on, its stakeholders; and (iii) the time frame in which The Boots Group envisions the issue becoming relevant.</p> <p>Transitional market-related risks are regularly assessed and prioritised as part of The Boots Group risk assessment process, which includes shifts in the supply and demand for certain commodities, products and services. Climate-related risks and opportunities are increasingly considered in this process. Chronic physical risks such as temperature changes due to climate change are included in The Boots Group's assessments regarding measuring and managing energy use and associated GHG emissions.</p>

TCFD Index continued

Disclosure Focus Area	Recommended Disclosures	Response
Risk Management		
	Describe the organisation's processes for managing climate-related risks.	<p>The Boots Group manages climate-related risk with a Group view and impact on the broader environment. The Boots Group manages these risks through its risk management programme, targets managed by the ESG Committee and in setting Group-wide practices and procedures, each with efforts to continually improve to on reducing the impact of climate-related risks.</p> <p>The risk management programme sets the framework for identifying, assessing and managing climate-related risks. The risk management programme is specifically designed and tailored to identify, monitor and assess significant short-, medium- and long-term risks to the Group and to help ensure that The Boots Group is taking appropriate steps to mitigate them. Risks are identified and assessed for all businesses and functions across The Boots Group. Within this process, each business is responsible for preparing and reviewing potential risks biannually.</p> <p>The risk management programme tracks current and emerging risks and provides recommendations for changes to The Boots Group key risk summary. Summaries of key and emerging risks are presented to the Audit Committee. Updates on risk mitigation are provided to the Audit Committee through the risk management programme or management presentations as appropriate. In addition to risk management, the ESG Committee maintains environment-related objectives that are tracked, monitored and cascaded to each business to align with local objectives and initiatives. The Boots Group completes the CDP climate change questionnaire annually and reports progress against its Healthy Planet commitments in this annual ESG Technical Report to hold itself accountable and communicate goals and progress.</p> <p>At The Boots Group, focus is given to preparedness and training. The Boots Group maintains a business continuity management programme and utilises nationwide resources, support systems and infrastructure to respond quickly, compassionately and effectively during natural disasters, emergencies and pandemics. The Boots Group has plans and protocols in place to effectively support and provide necessary services to minimise disruptions and keep stores open and operating, or provide other solutions, such as mobile location, to meet patients' and customers' needs. The Boots Group also implements processes to minimise supply chain disruption.</p> <p>In broader activities, The Boots Group endeavours to ensure the appropriate use of resources and materials, minimise waste and encourage reuse and recycling, ensure the safe handling and disposal of products, maintain environmental management systems, and communicate its commitment to the environment across the entire Group. Further, The Boots Group strives to ensure that the colleagues, customers, patients and communities it serves are safe during and after a crisis while maintaining continuity of service.</p>

TCFD Index continued

Disclosure Focus Area	Recommended Disclosures	Response
Risk Management		
	Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	<p>The Boots Group integrates the process for identifying, assessing and managing climate-related risks into the overall risk management process to ensure continued monitoring of the overall risk profile.</p> <p>Risk assessments encompass all strategic, operational, commercial, regulatory, reputational, legal and financial risks that could have an adverse impact on The Boots Group. The Boots Group is implementing learnings from the CSA results as part of its ongoing efforts to further integrate climate-risk management and mitigation within its business continuity and disaster recovery policies.</p>

TCFD Index continued

Disclosure Focus Area	Recommended Disclosures	Response
Metrics and Targets		
Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.	Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	The Boots Group regularly reports GHG emissions and energy consumption across its operations and selected supply chain categories, as well as the source associated with each emissions category. Further, the Group tracks solid waste generation and disposal methods across all its businesses. See the list of climate-focused initiatives and relevant data on pages 25-27 of this ESG Technical Report 2025 for more information.
	Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	The Boots Group annually quantifies Scope 1, 2 and 3 emissions through two reporting channels: the Energy and Emissions section of this ESG Technical Report 2025, including three years of data, and its CDP climate change questionnaire . The Boots Group Scope 1 and location-based Scope 2 emissions are calculated using commonly accepted emission factors. Scope 3 emissions were reported for two categories in accordance with the Greenhouse Gas Protocol's Corporate Value Chain (Scope 3) Standard: Business travel and downstream transportation and distribution (cars, aircraft, trains or by sea) for operations outsourced to third parties where deliveries are made exclusively for The Boots Group businesses. Risks associated with Scope 3 emissions include the estimations used in emission factors and the completeness of data. Climate-related risks are discussed on previous TCFD Index pages 76-81. Related emissions are monitored, measured and reported (see page 27).
	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	<p>The Boots Group set a target to reduce its absolute Scope 1 and 2 emissions by 30% from a 2019 baseline by the end of FY2030. This target is aligned with the Group's approach to addressing the impact of climate-related risks and opportunities on operations. As of FY2025, The Boots Group has reduced emissions by 37.1% from the 2019 baseline.</p> <p>To ensure our climate strategy is ambitious and credible, we formally committed to developing near- and long-term emission-reduction targets in line with the Science Based Targets initiative (SBTi), for Boots UK, Ireland, Opticians and No7 Beauty Company by end November 2026. Boots UK has published a Carbon Reduction Plan on its corporate website, www.boots-uk.com</p>

United Nations Global Compact (UNGC) Index

The Boots Group has been a signatory member of the UNGC since 2020.

The UNGC is a voluntary initiative based on CEO commitments to implement universal sustainability principles and to take steps to support UN goals. The Boots Group has been a signatory member of the UNGC since 2020 and supports the initiative's 10 principles on human rights, labour, environment and anti-corruption. Find Group's Letter of Commitment on the United Nations Global Compact website at www.unglobalcompact.org.

UNGC Principles	Disclosure
Human Rights	
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and	<div><div>– Sustainable Marketplace; pages 19-23</div><div>– Healthy and Inclusive Workplace; pages 15-18</div><div>– The Boots Group Code of Conduct and Ethics</div><div>– The Boots Group 2025 Modern Slavery and Human Trafficking Statement (updated January 2026)</div><div>– The Boots Group Human Rights Policy Statement</div><div>– The Boots Group Supplier Code of Conduct</div><div>– The Boots Group ESG Policy Statements</div></div>
Principle 2: Make sure that they are not complicit in human rights abuses.	

United Nations Global Compact (UNGC) Index continued

UNGC Principles	Disclosure
Labour	
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	<ul style="list-style-type: none">– Sustainable Marketplace; pages 19-23– Healthy and Inclusive Workplace; pages 15-18– The Boots Group Code of Conduct and Ethics– The Boots Group 2025 Modern Slavery and Human Trafficking Statement (updated January 2026)– The Boots Group Human Rights Policy Statement– The Boots Group Supplier Code of Conduct– The Boots Group ESG Policy Statements
Principle 4: The elimination of all forms of forced and compulsory labour;	
Principle 5: The effective abolition of child labour; and	
Principle 6: The elimination of discrimination in respect of employment and occupation.	
Environment	
Principle 7: Businesses should support a precautionary approach to environmental challenges;	<ul style="list-style-type: none">– Healthy Planet; pages 24-28– The Boots Group CDP Response FY2025 which covers 2024– The Boots Group Supplier Code of Conduct– The Boots Group ESG Policy Statements
Principle 8: Undertake initiatives to promote greater environmental responsibility; and	
Principle 9: Encourage the development and diffusion of environmentally friendly technologies.	
Anti-Corruption	
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	<ul style="list-style-type: none">– Ethical Sourcing Standards; page 21– The Boots Group Code of Conduct and Ethics– The Boots Group Supplier Code of Conduct– The Boots Group ESG Policy Statements

Assurance Report

GRI 2-5



Independent Limited Assurance Report to the Directors of The Boots Group Limited

Independent Limited Assurance Report by Deloitte LLP to the Directors of The Boots Group Limited on the selected sustainability metrics (the “subject matter information”) within the Environmental, Social and Governance Technical Report (the “ESG Technical Report”) for the reporting year ended 31 August 2025.

Our assurance conclusion

Based on our procedures described in this report, and evidence we have obtained, nothing has come to our attention that causes us to believe that the subject matter information for the year ended 31 August 2025, as listed below in the ESG Technical Report has not been prepared, in all material respects, in accordance with the Applicable Criteria as set out below.

Scope of our work

The Boots Group Limited has engaged us to perform an independent limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised) Assurance Engagements Other than Audits or Reviews of Historical Financial Information (“ISAE 3000 (Revised)”) and the International Standard on Assurance Engagements

3410 Assurance engagements on greenhouse gas statements (ISAE 3410) issued by the International Auditing and Assurance Standards Board (“IAASB”) and our agreed terms of engagement.

Assurance Report continued

The subject matter information in scope of our engagement for the year ended 31 August 2025, within the ESG Technical Report is as follows:

Specified Disclosures presented in accordance with the GRI Sustainability Reporting Standards (the “GRI Standards”):		
Specified Disclosures	GRI Standard and related sustainability metric(s)	Reported amount or disclosure
1. GRI 1-3.5: Access to Affordable and Quality Healthcare	Disclosure GRI 3-3: Management of material topics and the following The Boots Group Limited criteria: Total number of in-store health service locations and services that increase access to healthcare*.	a. Over 3,150 pharmacy locations. b. Total number of prescription items dispensed: over 200 million prescription items. c. Number of healthcare services offered: 114. d. Number of people supported/ accessing NHS Pharmacy First service through Boots: 1.5 million. e. Access to Boots Online Doctor in FY2025: increased by 80%.
2. GRI 416-1: Safety of Products and Services	Disclosure GRI 416-1: Assessment of the health and safety impacts of product and service categories from the GRI Standards 416: Customer Health and Safety 2016.	Health and Safety; page 36 Product Safety; page 37
3. GRI 414-1 and GRI 414-2: Responsible and Ethical Supply Chains	Disclosure GRI 414-1: New suppliers that were screened using social criteria and GRI 414-2: Negative social impacts in the supply chain and actions taken from the GRI Standards 414: Supplier Social Assessment 2016.	414-1: 100%. 414-2: Ethical Sourcing Standards; page 21.

Assurance Report continued

Specified Disclosures presented in accordance with the GRI Sustainability Reporting Standards (the “GRI Standards”):		
Specified Disclosures	GRI Standard and related sustainability metric(s)	Reported amount or disclosure
4. GRI 401-2 and GRI 403-8: Employee Health, Safety, and Well-Being	Disclosure GRI 401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees from the GRI Standards 416: Customer Health and Safety 2016 and Disclosure GRI 403-8: Workers covered by an occupational health and safety management system from the GRI Standards 403: Occupational Health and Safety 2018.	401-2: Colleague Health and Wellbeing, page 35 403-8: GRI Content Index, page 63
5. GRI 306-3, 306-4, 306-5: Waste Management	Disclosure GRI 306-3: Waste generated from the GRI Standards 306: Waste 2020 and Disclosure GRI 306-4: Waste diverted from disposal from the GRI Standards 306: Waste 2020 and Disclosure GRI 306-5: Waste directed to disposal from the GRI Standards 306: Waste 2020	306-3: 3,172 tonnes 306-4: 33,000 tonnes recycled; 48,000 tonnes reused. 306-5: 9,000 to landfill; nil incinerated.
6. GRI 302-1: Energy Consumption	Disclosure GRI 302-1: Energy consumption within the organisation from the GRI Standards 302: Energy 2016.	1,524,707 GJ
(for the year ended December 31, 2024)		
1. GRI 306-3: Plastics and Packaging	Disclosure GRI 306-3: Waste generated from the GRI Standards 306: Waste 2020.	3,712 tonnes
(as of August 31, 2025)		
1. GRI 405-1: Diversity, Equity, and Inclusion	Disclosure GRI 405-1: Diversity of governance bodies and employees from the GRI Standards 405: Diversity and Equal Opportunity 2016.	Diversity of ‘The Boots Group employees’ table, page 17

*The criteria for this disclosure has been defined within the Basis of Presentation prepared and published by The Boots Group Limited, within the ESG Technical Report.

Assurance Report continued

Specified Disclosures prepared in accordance with Sustainability Accounting Standards Board (“SASB”) Drug Retailers Sustainability Accounting Standards (the “SASB Standards”):

Specified Disclosures	SASB Standard and related sustainability metric(s)	Reported amount or disclosure
Accounting Metrics – Energy Management in Retail (for the year ended August 31, 2025)		
Ia. HC-DR-130a.I	HC-DR-130a.I: (1) Total amount of energy consumed in Gigajoules (GJ) (2) Percentage (%) grid electricity of total energy consumed (3) Percentage (%) of renewable electricity of total energy consumed	(1) 1,524,707 GJ (2) 72% (3) 4%
Accounting Metrics – Data Security & Privacy (as of August 31, 2025)		
2. HC-DR-230a.I	HC-DR-230a.I: Description of policies and practices to secure customers' protected health information (PHI) records and other personally identifiable information (PII)	Patient and Customer Data Privacy, page 40
Accounting Metrics – Patient Health Outcomes (as of August 31, 2025)		
3. HC-DR-260b.2	HC-DR-260b.2: Description of policies and practices to prevent prescription dispensing errors	Patient Safety: Pharmacy Dispensing, page 36
Activity Metrics (as of August 31, 2025)		
4. SASB HC-DR-000.A	SASB HC-DR-000.A: Number of pharmacy locations	Over 3,150 pharmacy locations.
5. SASB HC-DR-000.B	SASB HC-DR-000.B: Total area of retail space	1,900,000 m ²
6. SASB HC-DR-000.C	SASB HC-DR-000.C: Number of prescriptions filled	Over 200,000,000
7. SASB HC-DR-000.D	SASB HC-DR-000.D: Number of pharmacists	5,400

Assurance Report continued

GHG Specified Disclosures presented in accordance with the GHG Protocol and the GRI Sustainability Reporting Standards (the “GRI Standards”) (for the year ended 31 August, 2025);

Specified Disclosures	GHG Criteria and related sustainability metric(s)	Reported amount or disclosure
The GHG and Energy Emissions Statement	The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) published by the World Resources Institute/ World Business Council for Sustainable Development (the “GHG Protocol”):	As below
GRI 302-3: Energy Intensity	Disclosure GRI 302-3: Energy intensity from the GRI Standards 302: Energy 2016.	60 GJ per \$ million sales
GRI 305-1: Direct (Scope 1) GHG emissions in Table 1	Disclosure 305-1 Direct (Scope 1): GHG emissions from the GRI Standards: 305 Emissions 2016	54,000 metric tonnes CO ₂ e
GRI 305-2: Energy indirect (Scope 2) GHG emissions in Table 1	Disclosure 305-2 Energy indirect (Scope 2): GHG emissions from the GRI Standards: 305 Emissions 2016	Location-based: 71,000 metric tonnes CO ₂ e Market-based: 68,000 metric tonnes CO ₂ e
GRI 305-3: Other indirect (Scope 3) GHG emissions in Table 1	Disclosure 305-3 Energy other indirection (Scope 3): GHG emissions from the GRI Standards: 305 Emissions 2016	67,000 metric tonnes CO ₂ e
GRI 305-4: GHG Emissions Intensity	Disclosure GRI 305-4: GHG emissions intensity from the GRI Standards 305: Emissions 2016.	‘GHG emissions intensity’ table, page 27
SASB HC-DR-130a.I Energy Management	Sustainability Accounting Services Standards Board (“SASB”) Drug Retailers Sustainability Accounting Standards: Energy Management in Retail Topic	As above

Assurance Report continued

The subject matter information, as listed in the above table, needs to be read and understood together with the Applicable Criteria set out in pages 92-93 in the section of the ESG Report.

Inherent limitations of the subject matter information

We obtained limited assurance over the preparation of the subject matter information in accordance with the Applicable Criteria. Inherent limitations exist in all assurance engagements.

Any internal control structure, no matter how effective, cannot eliminate the possibility that fraud, errors or irregularities may occur and remain undetected and because we use selective testing in our engagement, we cannot guarantee that errors or irregularities, if present, will be detected.

The self-defined Applicable Criteria, the nature of the subject matter information, and absence of consistent external standards allow for different, but acceptable, measurement methodologies to be adopted which may result in

variances between entities. The adopted measurement methodologies may also impact comparability of the subject matter information reported by different organisations and from year to year within an organisation as methodologies develop.

We draw your attention to the specific limitations, due to the nature of the subject matter information, set out in the “Key procedures performed” section below.

Directors’ responsibilities

The Directors are responsible for:

- Selecting and establishing the Applicable Criteria.
- Preparing, measuring, presenting and reporting the subject matter information in accordance with the Applicable Criteria.
- Publishing the Applicable Criteria publicly in advance of, or at the same time as, the publication of the subject matter information.
- Designing, implementing, and maintaining internal processes and controls over information relevant to the preparation of the subject matter information to ensure that they are free from material misstatement, including whether due to fraud or error.

- Providing sufficient access and making available all necessary records, correspondence, information and explanations to allow the successful completion of our limited assurance engagement.

Our responsibilities

We are responsible for:

- Planning and performing procedures to obtain sufficient appropriate evidence in order to express an independent limited assurance conclusion on the subject matter information.
- Communicating matters that may be relevant to the subject matter information to the appropriate party including identified or suspected non-compliance with laws and regulations, fraud or suspected fraud, and bias in the preparation of the subject matter information.
- Reporting our conclusion in the form of an independent Limited Assurance Report to the Directors.

Our independence and competence

In conducting our engagement, we complied with the independence requirements of the FRC’s Ethical Standard and the ICAEW Code of Ethics. The ICAEW Code is founded

on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We applied the International Standard on Quality Management (UK) 1 (“ISQM (UK) 1”), issued by the Financial Reporting Council. Accordingly, we maintained a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Key procedures performed

We are required to plan and perform our work to address the areas where we have identified that a material misstatement in respect of the subject matter information is likely to arise. The procedures we performed were based on our professional judgment. In carrying out our limited assurance engagement in respect of the subject matter information, we performed the following procedures:

- Performed an assessment of the Applicable Criteria selected by you to determine whether they are suitable for the engagement circumstances, and, where necessary, discussed with the Directors the need for a ‘Basis of Reporting’.

Assurance Report continued

- Performed analytical review procedures to understand the underlying subject matter and identify areas where a material misstatement of the subject matter information is likely to arise.
- Assessed the risks of material misstatement in the subject matter information, based on inquiries of management to obtain an understanding of the Company, its environment, processes and information systems relevant to the preparation of the subject matter information. This risk assessment will provide a basis for designing and performing procedures to respond to assessed risks and to obtain limited assurance to support a conclusion.
- Through inquiries of management, obtained an understanding of internal controls relevant to the subject matter information, the quantification process and data used in preparing the subject matter information, the methodology for gathering qualitative information, and the process for preparing and reporting the subject matter information. We have not evaluated the design of particular internal control activities, obtain evidence about their implementation or test their operating effectiveness.
- Inspected documents relating to the subject matter information, including board committee minutes to understand the level of management awareness and oversight of the subject matter information.
- Performed procedures over the subject matter information, including recalculation of relevant formulae used in manual calculations and assessment whether the data has been appropriately consolidated.
- Performed procedures over underlying data using analytical procedures and on a statistical sample basis, where applicable, to assess whether the data has been collected and reported in accordance with the Applicable Criteria, including verifying to source documentation.
- Performed procedures over the Selected Information including assessing management's assumptions and estimates.
- Accumulated misstatements and control deficiencies identified, assessing whether material.
- Read the narrative accompanying the subject matter information with regard to the Applicable Criteria, and for consistency with our findings.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

We performed our engagement to obtain limited assurance over the preparation of the subject matter information in accordance with the Applicable Criteria. We draw your attention to the following specific limitations:

- The waste metrics listed above are dependent on suppliers fulfilling contractual obligations. Our procedures do not include obtaining any further assurance over the supplier's activities such as tracing the waste to its end destination.
- The Diversity, Equity, and Inclusion metrics listed above are derived from self-declared responses from employees. As a result, our procedures did not include validation that self-reported assertions are appropriate.

Use of our report

This report is made solely to the Directors of The Boots Group Limited in accordance with ISAE 3000 (Revised) , ISAE 3410, and our agreed terms of engagement. Our work has been undertaken so that we might state to the Directors of The Boots Group Limited those matters we have agreed to state to them in this report and for no other purpose.

Without assuming or accepting any responsibility or liability in respect of this report to any party other than The Boots Group Limited and the Directors of The Boots Group Limited, we acknowledge that the Directors of The Boots Group Limited may choose to make this report publicly available for others wishing to have access to it, which does not and will not affect or extend for any purpose or on any basis our responsibilities. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than The Boots Group Limited and the Directors of The Boots Group Limited as a body, for our work, for this report, or for the conclusions we have formed.

Deloitte LLP
United Kingdom
6 February 2026

Basis of Presentation

GRI 2-2

FY2025 Environmental, Social And Governance (ESG) Data Organisation

The Boots Group is a trusted leader in healthcare, pharmacy and retail, operating across 11 countries – including the UK, Ireland, Thailand and Mexico with approximately 3,300 store locations. In Germany, the pharmaceutical wholesale division stands as a key healthcare partner, providing essential services to pharmacies and pharmaceutical manufacturers nationwide.

Scope

This report provides detailed information about the Company's ESG initiatives and related key performance indicators (KPIs). In the creation of this document, the Company used multiple internationally recognised standard ESG frameworks and other non-standard reporting guidance from industry frameworks. The Company also developed its own standard definitions for reporting its performance data and KPIs which are defined below. See Use of multiple frameworks section below for further information.

This ESG Technical Report 2025 has been prepared based on a fiscal

reporting year that is the same as the Company's financial reporting period 1 September 2024 to 31 August 2025 with the exception of Packaging Material by Weight, which is prepared for the calendar year ending 31 December 2024.

"Manager" refers to employees with at least one direct report.

Organisational boundaries:

Business acquisitions – acquired businesses are included within the ESG reporting scope from the first day of the fiscal year following the year of acquisition. The complete dataset is reported once data for a full year are available.

Divestments – businesses that are no longer subsidiaries of the Company at the fiscal year end due to divestment in the reporting year are excluded from current year ESG reporting scope.

Equity method investments – equity method investments are excluded from the Company's ESG reporting scope.

Franchise operations – franchise operations run by third parties where a The Boots Group business is the franchisor are excluded from the Company's ESG reporting scope.

Outsourced activities – outsourced activities are excluded from the ESG reporting scope, except where the outsourcer's activities are dedicated to the Company's business and where the associated impacts may be significant to our ESG performance and disclosures as measured by our subject matter experts, for example, third-party product deliveries made exclusively for The Boots Group. The Company's Code of Conduct and Ethics set out the principles for dealing with, and the requirements for, suppliers.

Greenhouse Gas (GHG) emissions have been reported for those entities for which the Company has financial control, as defined by the GHG Protocol. GHG emissions pertaining to the organisational and operational boundaries as defined below have been reported for global operations for owned, managed and leased locations including retail stores, pharmacies, retail distribution centres, pharmaceutical distribution centres and principal office facilities.

In accordance with the GHG reporting policies set out here, the Company has set fiscal 2019 as the GHG baseline year for Scope 1, Scope 2 and Scope 3 emissions as it represents the first year for which verifiable emissions data is available, and

intends to report emissions against this baseline year going forward.

We consider a 5% change of emissions as material and as our threshold for restatements.

On 31 October 2023 the Company completed the sale of the Farmacias Ahumada business in Chile. This did not result in a change of emissions of 5% or more. As such, fiscal 2019 will remain the baseline year.

Use of multiple frameworks

The Company's ESG Technical Report 2025 covers material topics identified through a double materiality assessment conducted in fiscal year 2023. The Company follows the Global Reporting Initiative (GRI) definition of materiality.

Standard frameworks

The Company utilises, and aligns to, the following frameworks to report metrics where applicable:

1. Global Reporting Initiative (GRI)
2. Sustainability Accounting Standards Board (SASB), maintained by the International Sustainability Standards Board (ISSB)
3. United Nations Global Compact (UNGC) commitments
4. Task Force on Climate-related Financial Disclosures (TCFD)

For emissions reporting, specifically Scope 1 and 2 GHG emissions, the information has been prepared in accordance with the GHG Protocol. As described in the GHG Protocol: Corporate Standard, GHG emissions reported under Scope 3 are optional for reporting. The Company is reporting on two of the 15 Scope 3 categories: Business travel and Downstream transport. Collectively, the Corporate Accounting and Reporting Standard, Revised Edition and Corporate Value Chain (Scope 3) Accounting and Reporting Standard are referred to as the GHG Protocol in this document. Emissions factors from DEFRA (UK Department for Environment, Food & Rural Affairs) and IEA (International Energy Agency) are used.

Under GRI-3, “Access to Healthcare” has been identified as a material topic for the Company, and is disclosed in line with the following Company-developed standard definitions.

Pharmacy locations - a pharmacy location is defined as a location where prescription drugs are administered and other pharmaceutical services are provided by trained and qualified pharmacists commissioned by the local country's National Health Service or privately. Locations are measured as at year end, only includes stores that are actively trading on the final day of the financial year, and includes only those entities within the following jurisdictions over which the Company has operational control over pharmacy

locations: United Kingdom, Republic of Ireland, Mexico, and Thailand.

Prescribed items - a prescription item, or prescribed item, is a specific pharmaceutical product, device, or other item that a healthcare professional has formally requested be dispensed to a patient via a medical prescription. These are measured for all entities within the Company's reporting boundary, as defined above.

Healthcare services - a healthcare service is defined as a service listed per the A-Z directory on the Boots Health Hub website: A-Z Health Services - Boots Health Hub | Boots directory website as at 31 August 2025 has been used to measure this metric. When used in the context of healthcare services, the term “offered” is defined as the total number of healthcare services listed, and therefore on offer, within the directory website at year-end. Services that have been offered at some point in the year, but have since been removed by the measurement point are not included within the metric.

NHS Pharmacy First - the number of people supported by NHS Pharmacy First is defined as the number of individual consultations performed by Boots pharmacy teams on one or more of the defined conditions (Sinusitis, Sore Throat, Earache, Impetigo, Infected Insect Bites, Shingles, and Uncomplicated Urinary Tract Infections (UTIs)) within the UK

(excluding Wales as the Pharmacy First scheme does not operate there). Where an individual has consulted more than once, all consultation instances are counted. These are measured as any consultations performed during the financial year. A “consultation performed” is defined as when a conversation has been held between a Boots pharmacy team member and a customer, discussing the treatment and management options for the conditions stated above.

Boots Online Doctor - access to Boots Online Doctor is measured in terms of the percentage change of revenue earned during the financial year, specifically from the [Boots Online Doctor site](#) compared to the previous financial year, based on data obtained from The Boots Group finance team.

Reporting of metrics and data

The Boots Group has a Company-wide approach to recording, measuring and reporting ESG performance, including a set of reporting criteria and a set of ESG measures and performance indicators. The Boots Group utilises documented definitions and procedures related to ESG data and metrics to ensure completeness and consistency. These procedures provide for the use of estimation and extrapolation techniques in instances in which data is not practicable to

source. The Company reviews definitions and procedures on an annual basis.

ESG performance data is collected on an annual basis. All submissions by individual businesses are prepared by local finance teams and ESG champions and are reviewed by senior finance leaders.

Every effort is made to ensure that we report accurate data, and our processes are designed to support this. In cases where we become aware of updates to data from previous years, we consider providing updated data in subsequent reports if the changes result in a discrepancy that is material as per our restatement policy above. In these cases, we provide details in footnotes to our data tables.

Legal Notice

Forward-looking statements

All statements in The Boots Group ESG Report 2025 that are not historical, including goals for and projections of future results, the expected execution and effect of our corporate social responsibility strategies and initiatives and the amounts and timing of their expected impact, constitute forward-looking statements that are based on current societal, market, competitive and regulatory expectations. These forward-looking statements are not guarantees of future performance and are subject to risks, uncertainties and assumptions, known or unknown, which could cause actual results to vary. These statements speak only as of the date they are made and The Boots Group undertakes no obligation to update publicly any forward-looking statement included in The Boots Group ESG Report 2025, whether as a result of new information, future events, changes in assumptions or otherwise.

Trademarks

THE BOOTS GROUP and THE BOOTS GROUP LOGO are trademarks owned by The Boots Company Plc.

BOOTS, THE BOOTS LOGO, BOOTS PHARMACEUTICALS, BOOTS SOLTAN, BOTANICS THE POWER OF PLANTS, CLEAN ON ME, NO7, SLEEK MAKEUP and SOAP & GLORY are trademarks owned by The Boots Company Plc.

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gesundleben is a trademark owned by Alliance Healthcare Deutschland GmbH.

Third-party trademarks mentioned are the property of their respective owners. The use of words such as partnered, partnering, partner and variations of such words in this ESG Technical Report 2025 is not intended to and shall not be construed to imply that a legal partnership relationship exists between The Boots Group and any other company.

Exchange rates basis of preparation

Foreign currency amounts have been presented in British Pounds Sterling (£) for consistency, having been translated at the average exchange rate for the 12 months ending 31 August 2025. The most significant rates are 0.77 British Pound Sterling per U.S Dollar and 0.84 British Pound Sterling per euro.

Funds raised in other currencies over multi-year periods were converted to U.S. dollars using average exchange rates for the reporting periods in which the funds were raised.

Photo credits

Page 1 (top left) Giulia Lannicelli

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