

Our best for  
your goods.



acarpa

Sustainability Report 2023



**We are** packaging-enthusiasts  
from across Europe, united by  
our ambition to protect goods.

adapa

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## purpose 31

"Purpose" is our underlying pillar. It aligns our people to their different roles and leads us on our journey of co-creation. Purpose lends meaning and invites all employees to contribute as much as they are capable of. At adapa we have taken up this challenge and play an active role in shaping the future of the flexible packaging industry.



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# Foreword

As we advance through 2024, we are focused on accelerating our transformation towards a more sustainable and transparent future. This year, we are making a significant transition from the Global Reporting Initiative (GRI) to the European Sustainability Reporting Standards (ESRS). This shift reflects our commitment to refining our sustainability practices and enhancing the clarity of our reporting.

In 2023, we undertook ESG strategy workshops based on our GRI double materiality assessment. These sessions enabled us to pre-define strategic targets aimed at mitigating our environmental and social impacts. As we transition to the ESRS, these targets will be reviewed and updated to align with the new standards, ensuring that our strategies remain both effective and forward-looking.

We are dedicated to continuously expanding and refining our goals to meet evolving sustainability

expectations and leverage meaningful progress. Our efforts are geared towards building a robust framework that supports our long-term vision and accelerates our ambitions. Our focus on sustainability, combined with our commitment to operational excellence and innovation, will drive our long-term success and we look forward to the journey ahead.

This comprehensive report would not have been possible without the exceptional teamwork and dedication of our entire #teamadapa. For more information and updates on our progress, please visit our Group website or reach out to your respective contact person at adapa.

As always, we extend our heartfelt gratitude to all our stakeholders for your continued support and shared values, which are instrumental in shaping our future.



Noël Kasmi  
Chief Executive Officer



Marek Pawlak  
Chief Sales Officer



Patrick Speek  
Chief Financial Officer (Interim)

## Adaptability to a changing World

We are open-minded, flexible and bold. We actively anticipate, support and drive change. We take responsibility for shaping our new reality together.

## Continuous Improvement

We constantly challenge ourselves and the world around us to strive for a better future. Continuous improvement is about curiosity and learning from our mistakes. In short: we are prepared to leave our comfort zone.

## Trust

We offer trust by having faith in people – believing they are doing their best, every day, to embrace openness, respect, fairness, empathy and integrity. We earn trust by living up to the expectations of our partners in whatever we do. Every single day. On every scale, large or small.

## Accountability & Reliability

Accountability means acting responsibly and taking ownership. We always involve our stakeholders in decisions we make. Reliability means being committed – to our goals and the goals of our customers. It's doing what we say and saying what we do.

## Team Spirit

We live and breathe true team spirit and work together towards a common goal. In this way, many 'I's' become a collective 'we'.

## Sustainability

It is crucial to protect our wonderful world for future generations. We use our planet's resources responsibly and prioritise sustainability in all aspects of our operations. One of our core values is to meet the highest social standards and demonstrate ethical integrity not only in our business, but across our supply chain.

# About adapa Group

adapa Group, headquartered in Wiener Neudorf, Austria, specialises in innovative, high-quality and customised high-barrier packaging solutions for the food, tobacco, hygiene and pharmaceutical industries. With its integrated value chain from sourcing of raw materials and extrusion to printing and converting, the company, which was founded as Schur Flexibles in 2012 and later renamed in 2022, generates annual sales of about EUR 620 million, making it one of the leading companies in the industry in Europe. adapa employs around 2,000 people at 20 sites across Europe, which are highly specialised Centres of Excellence and enjoy technology leader status in their field. Sustainability is at the heart of the company's business activities.

## adapa Holding

Head Office adapa Group

### Germany

**1 adapa Germany Freital**  
Flexo-printed, coated and laminated paper structures; specialised in strip lamination

**2 adapa Germany Kempten**  
Skin films, double-side-printed barrier shrink tubes, films and bags; rigid PP films for the food industry; in-house recycling

**3 PS Polymer Sourcing**  
Selection, procurement and distribution of raw materials

**4 adapa flexibles Denmark Bjert**  
Blown film extrusion of multi-layer PE films for the food-, pharma- and tobacco-industry; in-house recycling

**5 adapa flexibles Denmark Slagelse**  
Printing, extrusion-coating, lamination, lacquering and die-cutting for the pharma- and dairy industry

**6 adapa Finland Jakobstad**  
Cast films with and without barrier for the food, medical, pharma- and tobacco industry; in-house recycling

### France

**7 adapa France Averdoingt**  
Rotogravure printing, lamination and slitting, focusing on fresh food and coffee market  
**digiflex**  
digital printing for small and medium production runs in all market segments

**8 adapa France Fontenay-le-Comte**  
Flexo printing and lamination, mainly for the fresh food market

**9 adapa France La Ferté-Bernard**  
Stand-up pouches, shrink-sleeves and sachets for food and beverages

**10 Prisma Cylinders**  
Engraving High quality rotogravure cylinders

**11 adapa Greece Komotini**  
Gravure printing, lamination and slitting for the food and hygiene industry

**12 adapa Italy Florence**  
Blown film production with inline MDO possibilities for food application and technical films; industrial packaging films and skin films; in-house recycling facility

**13 adapa Italy Forli**  
Flexo- as well as rotogravure printing solutions and solvent-based/-less lamination for food and beverage packaging

### Netherlands

**14 adapa the Netherlands Amersfoort**  
Rotogravure and offset-printing for tea tags and sachets as well as for coffee

**15 adapa the Netherlands Leek**  
Double-sided rotogravure printing of sensitive substrates like thin PE-films or other high-stretchable materials

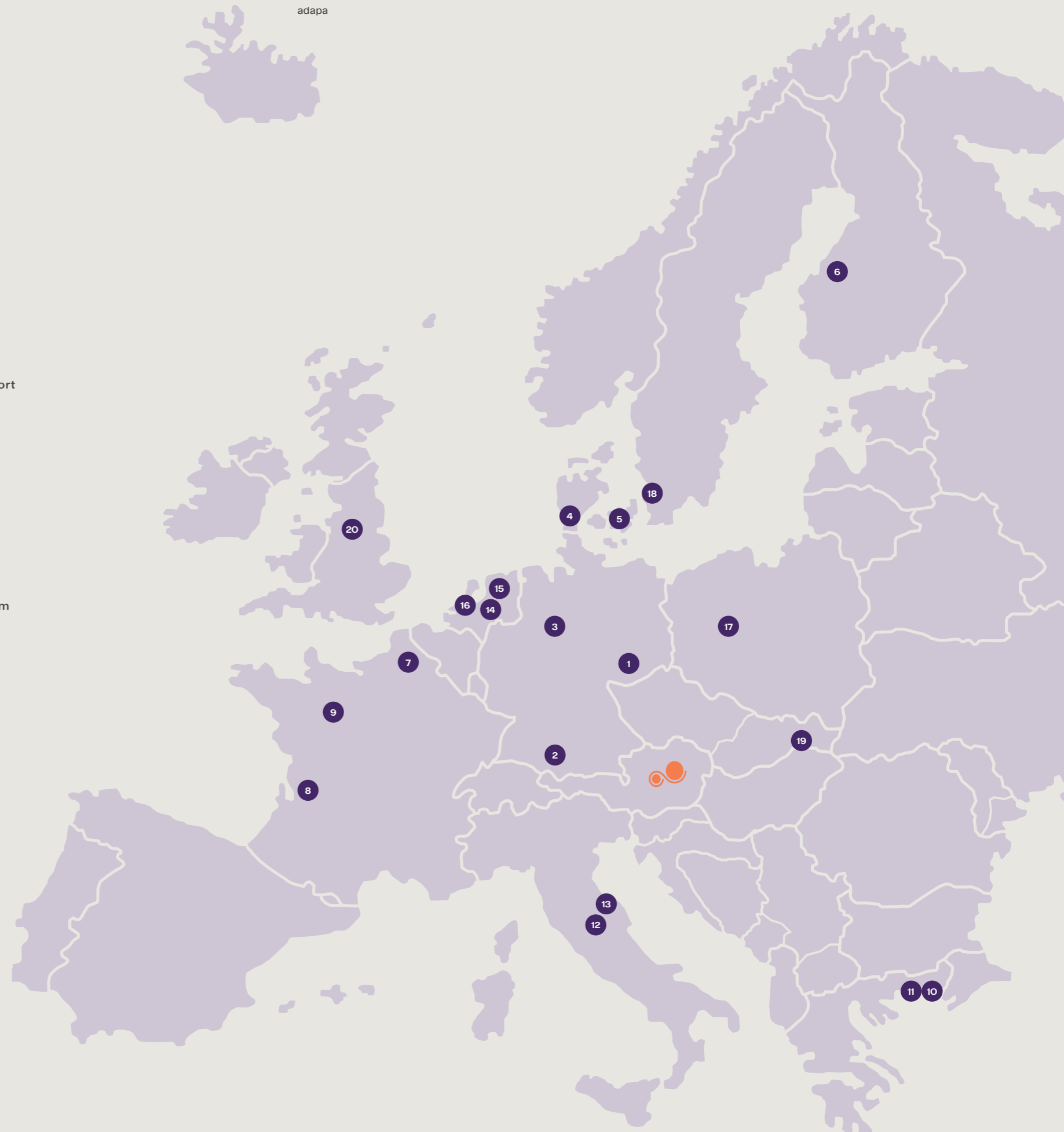
**16 adapa the Netherlands Rotterdam**  
Coated and laminated paper-based structures mainly for candies and chewing gum; specialised in strip lamination

**17 adapa Poland Bogucin**  
Flexo printing and lamination for food and hygiene packaging; specialised in drawstring and wicketed bags

**18 adapa Sweden Landskrona**  
Flexo printing and laminating for food and non-food products

**19 adapa Slovakia Trebišov**  
Paper- and film-based packaging for confectionery; specialised in strip lamination

**20 adapa UK St Helens**  
Flexo printing, lamination and bag making incl. shrink bags, mainly for the UK & Ireland food industry



The map shows the list of sites as of August 2024. Between 2023 and 2024 the merger of two sites in the Netherlands and in Germany was in progress.

# Our integrated value chain: a one-stop shop for flexible packaging solutions

adapa is a solution provider for flexible packaging, boasting a fully integrated value chain, from the sourcing of raw materials, production, printing, laminating and refinement to recycling, individually or as a package. The company is a specialist for customised solutions with a broad specialty portfolio. The 20 sites, each a Centre of Excellence

in its respective market, offer a full vertical integration of customised flexible packaging production. This makes the company an innovative driver of sustainable speciality solutions, especially as it operates some of the most technologically advanced printing facilities in Europe.



1

**Purchasing** – Excellent raw materials are the basis for high-performance packaging solutions.

All adapa extrusion sites place their resin orders directly with their suppliers for an efficient supply chain. A central purchasing organisation monitors the supply of raw materials for all sites, providing global market insights and strategies to secure the ongoing supply of all required materials.



2

**Extrusion** – The raw material is melted to form the molten polymer into a shape with a continuous profile.

adapa focuses on sustainable products in film production, which the company runs at its sites in Denmark, Finland, Germany, Italy and France. In addition to polyethylene films and polypropylene flat films, adapa develops individual packaging solutions, ideally customised to suit customer and market requirements. For example, this could mean customising high-barrier shrink films for shrink bags and 3-side sealed pouches as well as extremely flexible PA/PE films or PP based rigid films.



3

**Cylinder engraving** – Copper plating, polishing and engraving of rotogravure cylinders.

The high-quality cylinders are the basis for top printing quality. adapa Greece Engraving site in Komotini, Greece is the Centre of Excellence for producing cylinder bodies and engravings. All roto cylinders are copper plated and polished before being engraved, chrome-plated and finished with the desired printing image and surface roughness.



4

**Printing** – Rotogravure, flexo print as well as UV offset and digital printing, all tailored to individual client needs.

adapa covers the entire range of printing processes on polymer films, aluminium foils and paper based substrates, from rotogravure and flexo printing to UV-offset printing, providing optical effects from matt to high-gloss varnish or tactile effects. An engraved cylinder (roto) or plate (flexo) with the desired pattern is immersed in ink. The substrate is then sandwiched between this cylinder and a roller to obtain the pattern. Additionally, adapa has been successfully ramping up its digital printing capacities in a long-standing strategic partnership with HP Indigo.



6

**Slitting** – The large roll of material is cut into narrower rolls suitable for the customer.

The substrate web is unwound and passed through blades before being rewound as a narrower roll in a highly precise and customised process.



5

**Laminating** – Solvent-free or solvent-based adhesive lamination is used to fuse the individual films into a composite, fulfilling various functionalities.

Two or more webs are taken and joined using a bonding agent. The adhesive is applied to the less absorbent web, and the other is then pressed against it. The carrier film is the film layer that is used for printing the film. The composite film can be equipped with an additional barrier layer.



8

**Recycling** – Recycling of extrusion production waste.

Our extrusion sites recycle their internal waste by grinding and re-using it. With its compacting and re-extruding processes, adapa Italy Florence is the specialist in the Group for recycling own and customer's PIR. Furthermore, several converting sites operate own solvent recovery plants.



7

**Converting & bag making** – Printed and laminated polymer webs are converted directly into bags, sleeves or pouches.

We offer a wide range of drawstring bags, stand-up pouches and various other pouches, or other tailor-made formats requested by the customer.

# Protective packaging solutions

Driving and accelerating sustainable innovations for each of our products and services in close cooperation with individual client needs is a key element of our growth strategy. For this reason, sustainability is at the core of and reflected in our product portfolio. Our teams from R&D, sales and sustainability closely collaborate to deliver best-in-class innovation based on a client-oriented focus.

Furthermore, the R&D strategy aims to promote a group-wide knowledge exchange and innovation management in close collaboration with clients as a means of developing tailor-made solutions. That is why all innovation work includes local experts at all production sites who run test stations and laboratories to continuously improve production processes. The R&D centres in Denmark, Finland, Germany, Greece and Italy seeks to expand the Group's portfolio of sustainable products.

In turn, this is crucial to creating future-oriented solutions which meet all legal and sustainability requirements across Europe and ensure optimal operability at client sites. Standardised interaction like this has demonstrated the company's ability to deliver the greatest benefit from tailor-made solutions and meet customer needs fully and completely.

# Prevent

Avoidable food waste is a significant part of the carbon footprint of food products. Protective packaging solutions increase shelf life and guarantee food safety, thus leveraging the effects of preventing food waste.

Manufacturers expect perfect machine runnability, and protection of the product against damage, contamination, light, moisture or oxygen. Sometimes, the packaging is also supposed to support the further improvement of the product such as ripening.

# Protect

# Attract & inform

Consumers expect an attractive packaging design, which also provides important information on product usage, ingredients, shelf life or disposal, along with a guarantee for the best quality and freshness of the packed good.

# Recycle

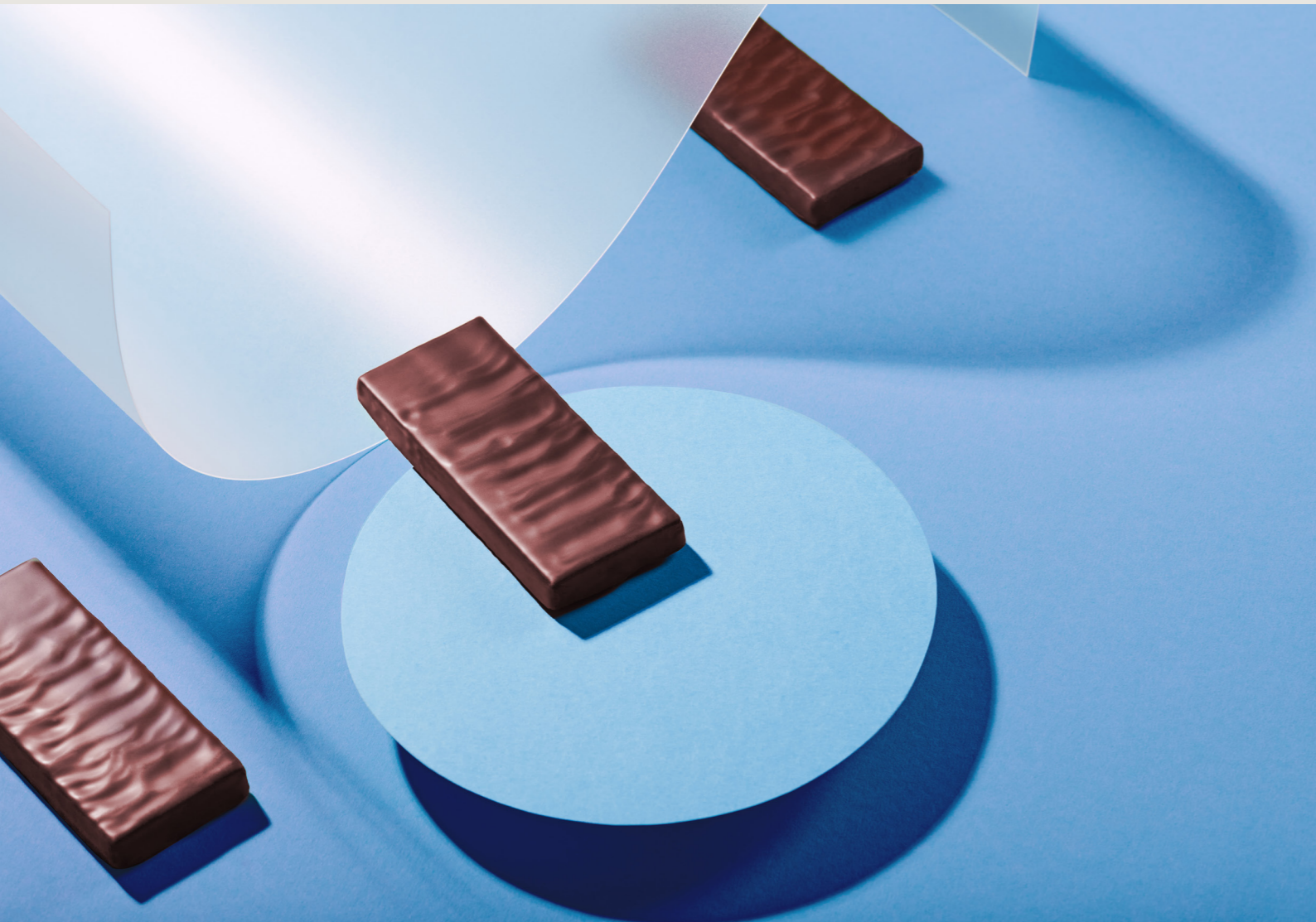
Society at large expects packaging materials which are reduced to an absolute minimum and recycled in a circular economy in order to preserve our planet's future.

# Our products

adapa offers an extensive portfolio of products and services for efficient and safe packaging. Continuous technological innovation and a willingness to create tailor-made solutions is what drives us. With our comprehensive range of packaging customised to individual requirements, we offer our customers the convenience of receiving a complete set of solutions from a single source. By doing so, we also provide the opportunity of hands-on collaboration to solve future challenges. In this collaborative process, packaging solutions can be individually designed and tested to simulate and optimise the packaging process required by the

customer. Our product portfolio consists of efficient mono materials and sophisticated and functional multilayer structures for high-performance sealing and barrier protection for products.

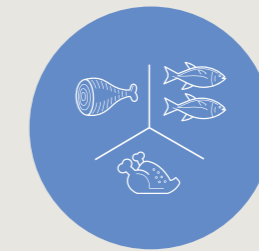
Since 2018, we have been primarily developing sustainable packaging with a strong focus on resource-saving solutions and materials ready for recycling. Since 2019, our portfolio comprises at least one product designed for recycling for every consumer market segment adapa serves and our goal is to increase this share and expand the Group's portfolio of products designed for recycling.



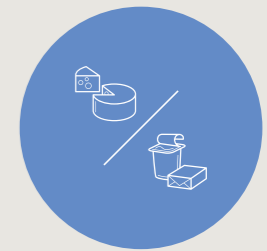
# Market segments



Confectionery



Meat, Fish and Poultry



Cheese and Dairy



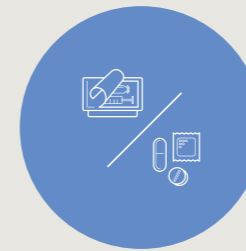
Tobacco



Coffee and Tea



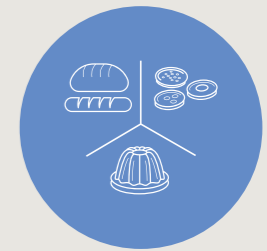
Frozen Food and Ice Cream



Healthcare



Home and Personal Care



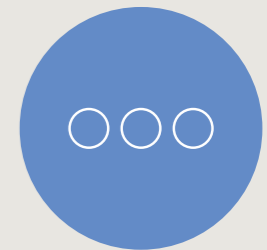
Bread, Biscuits and Cakes



Fruit and Vegetables



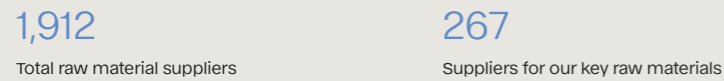
Dry Food and Cereals



Further Specialties

# adapa in numbers

## Raw material suppliers



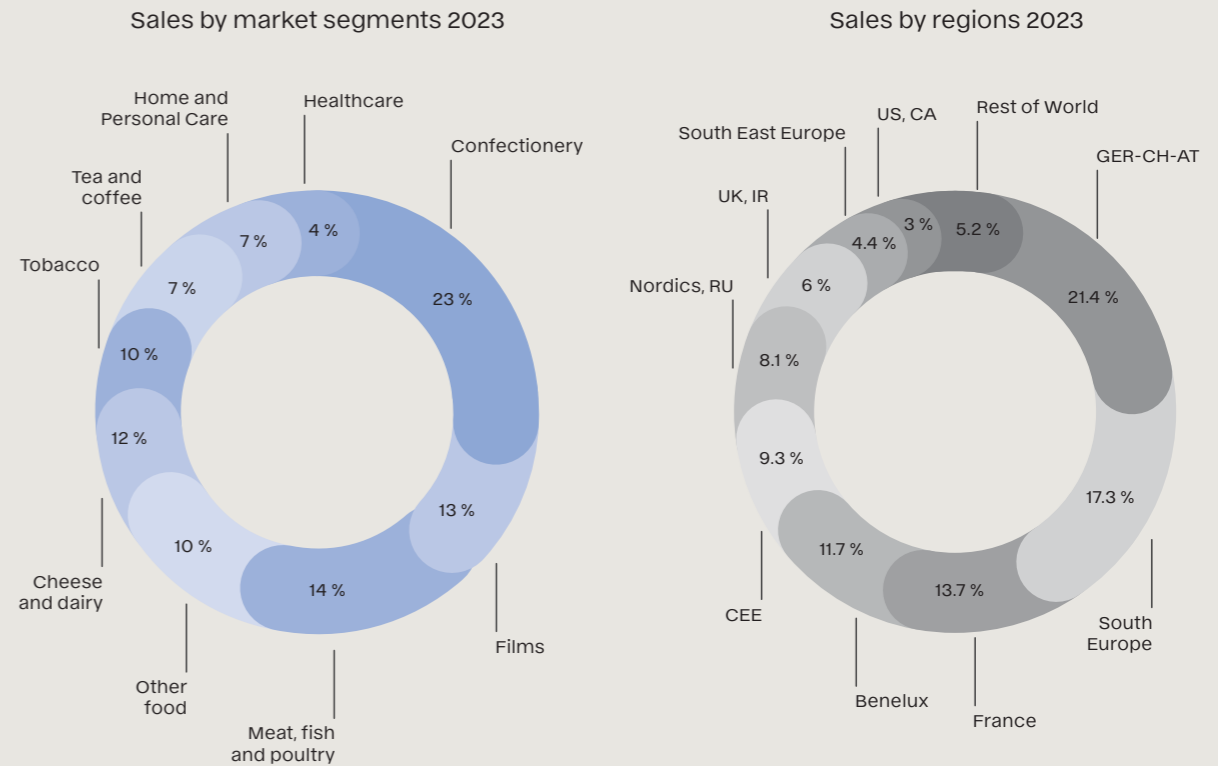
## Number of employees



The HR data is based on headcounts.

# Sales by regions and market segments 2023

We develop and produce premium-quality, tailor-made medium or high-barrier packaging solutions in the food, tobacco, healthcare, home and personal care and film segments.



## 1 reduction

Innovative research and development is the key to thinner, lighter packaging solutions that still offer high quality and ensure excellent protective functionality. Additionally, we concentrate on down-gauged packaging solutions which are simultaneously designed for recycling. The notion of reduction is also a core element enabling us to optimise the resources needed during production. Our starting point is efficiency in our production processes as well as renewable energy and waste treatment. This holistic approach throughout every single step in our daily work is a sustainable way to reduce our carbon footprint.

Reducing the use of plastic materials requires a high level of technical expertise because the protection of goods and consumers must be ensured and the finished packaging material has to be processed easily on existing customer packaging lines. Nonetheless, the potential to reduce the use of resources, particularly by way of flexible packaging, is enormous if compared to other alternatives available on the market. Up to 58 kilogrammes of products can be packed and protected with only one kilogramme of flexible film. This comprises a real benchmark amongst packaging solutions.

## 2 renewal

The resources of our planet are finite and must be preserved. To keep our planet's ecosystem in balance, we need to regenerate and renew materials removed from the system. Therefore, we focus on raw materials that do not overexploit the resources of our planet, for instance using certified paper made from sustainably managed forests or substituting fossil-based polymer raw materials with renewable materials. Our R&D team is constantly expanding our portfolio made of renewable materials.

## 3 replacement

We want to replace conventional materials with new and innovative ones, including the use of alternative input materials to reduce the amount of virgin plastic per packaging unit while also considering its recyclability. We also work towards replacing rigid packaging with flexible packaging, and continue to introduce new, innovative packaging concepts to replace conventional concepts. This allows us to reduce material per unit yet maintain the highest levels of protection.

## 4 recycling

We aim to make raw materials in packaging films recyclable to fully exploit the benefits they offer and keep them in a closed loop cycle. As part of the rethink concept, we offer packaging solutions which are designed for recycling in line with the Circular Economy for Flexible Packaging (CEFLEX) Designing for a Circular Economy (D4ACE) guidelines. We invest heavily in the research and development of flexible packaging materials to facilitate recycling and thus support a circular economy. We already offer at least one product designed for recycling for our consumer goods markets, except for healthcare.

## 5 responsibility

Responsibility is more than a pillar – it is THE foundation of our business. We take responsibility for our products, our company and for the people we work with. We are committed to sustainability in all of our Group's activities, in our production as well as our collaboration process. Keeping a balanced ecosystem in mind, we continuously work on clever approaches to reduce the environmental impact of our products. We do so in close cooperation with our stakeholders – every single day, in every step of our work.

reduction  
renewal  
replacement  
recycling

# responsibility



### The adapa rethink initiative

At adapa, we rethink existing packaging solutions in collaboration with our customers to develop more sustainable alternatives. We offer our clients a full-service, holistic concept within the context of this initiative, including consultation, conception, material development as well as process implementation. This is designed to enhance the sustainability of our clients' packaging range and still fulfil the highest product protection standards.





## 5R product examples

### 1 reduction



#### 3-DMX 38 shrink bag

Continuous improvement being one of our core values, we regularly seek to improve on established products. In the case of our 3-DMX shrink bag this approach and the excellent process control gathered through our 40 years of experience have allowed us to successfully launch a 38 my version. With this new bag we have thus achieved a 30 per cent reduction in thickness versus our standard maturing bag.

### 2 renewal



#### Cepi certified PaperTwister<sup>re</sup>

Recycling guidelines are constantly evolving and we need to adapt to them. With the new 'Confederation of European Paper Industries' (Cepi) certification demanding a very good repulpability of paper packaging – including a metalised version – are now running smoothly at the highest speeds that twist machines are currently capable of.

### 3 replacement



#### EcoString bag with PE strings

Without consumer acceptance it is difficult for manufacturers and retailers to introduce 'better' solutions. With the new generation of our EcoString bags, where the strings look and feel exactly like the former viscose strings but are now made solely from PE, the consumer does not see the difference. This helps our customers introduce our products more easily.



### 5 responsibility

#### Preparing for the use of PCR content

To reach a circular economy, a defined degree of post-consumer recycled content in flexible packaging will become mandatory. Preparing for this change, we have certified our sites according to the International Sustainability and Carbon Certification (ISCC PLUS) and the standard, enabling us the control of blending in a chain of custody mode and therefore to use mechanical post-consumer recycled (mPCR) materials. Our efforts have gone even further in the tobacco segment, in which we have already successfully launched a tobacco pouch made from chemical post-consumer recycled (cPCR) materials.

### 4 recycling

#### Cepi-certified PaperFlow<sup>re</sup> P-type

With the new demand for Cepi certification for paper products that came in the end of 2022, we fine-tuned our PaperFlow<sup>re</sup> P-type – a sophisticated laminate of extremely thin OPP with paper – to pass the repulping tests demanded by Cepi certification. Furthermore, this new structure runs very well on existing packaging lines that have formerly been used for plastic films.



# Materiality analysis

The materiality analysis is at the core of our sustainability reporting. Through this analysis, we can identify our impacts on the environment and society, as well as the financial risks and opportunities that may arise from sustainability issues. Furthermore, we can align our strategy to address the identified impacts, risks and

opportunities effectively. To be prepared for the upcoming EU Corporate Sustainability Reporting Directive (CSRD), we decided to apply the principle of double materiality in our materiality analysis. This approach considers sustainability aspects from two perspectives:

**Inside – out perspective**

Impact materiality considers the impacts – whether positive or negative, actual or potential, intended or unintended, short-term or long-term, reversible or irreversible – that our business activities or relationships may have on the environment, society and governance.

**Outside – in perspective**

Financial materiality considers the financial risks and opportunities that may arise for us due to sustainability issues.

To conduct the double materiality analysis, we followed the following process that has been guided by external consultants. Further, the leadership has been regularly informed about the process and the results.



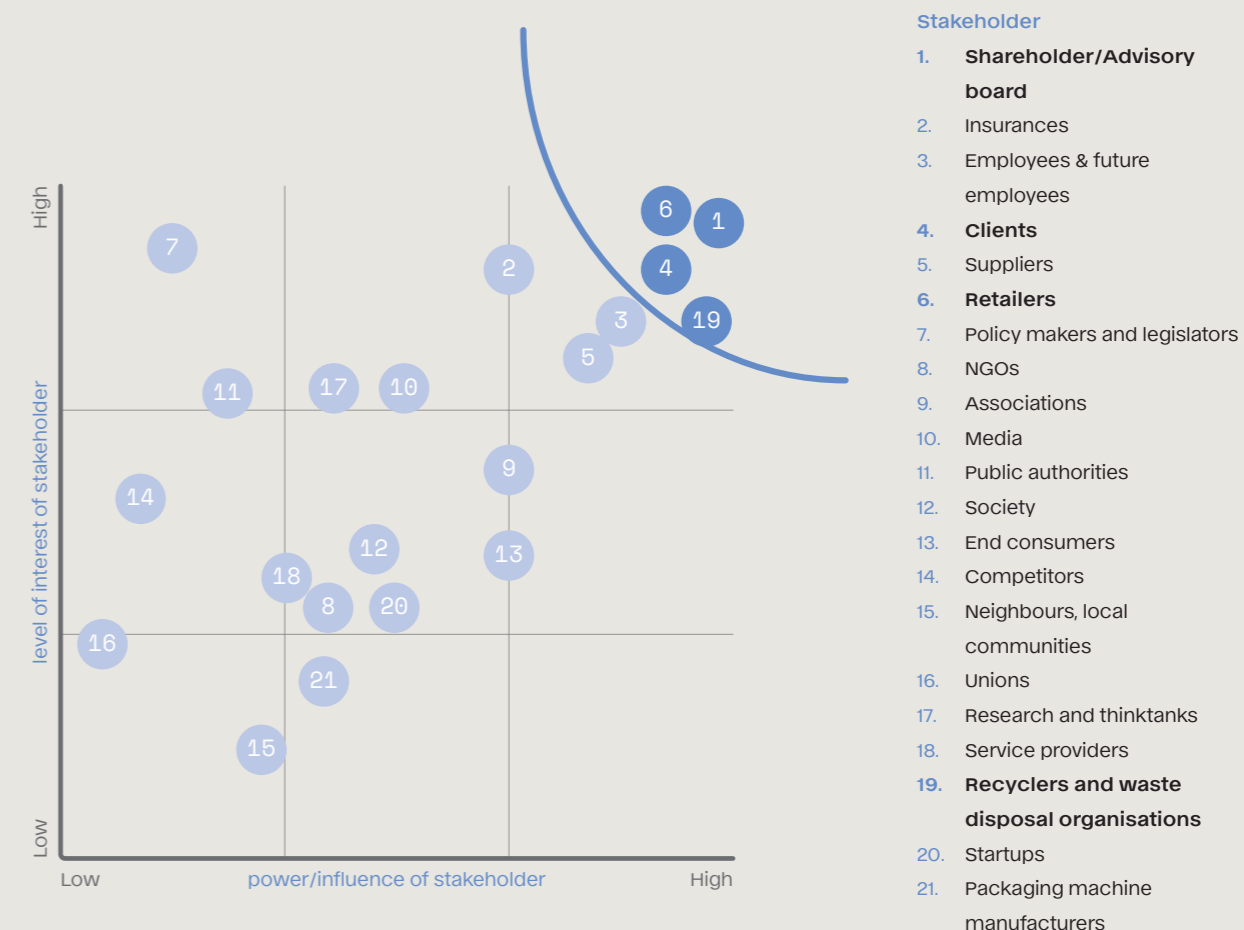
# Materiality analysis Stakeholder dialogue

To bring an external perspective into the process, we organised a stakeholder dialogue. Engaging with our key stakeholders has always been important to us, and in the past, we have consistently sought contact through various formats at regular intervals.

We decided to engage with fewer stakeholder groups and instead to have a more in-depth dialogue with those we selected. The groups with which we organised a dialogue are: 'Shareholders/Advisory Board', 'Clients', 'Retailers', and 'Recyclers and Waste Disposal Organisations'

For this process, we updated our stakeholder matrix from previous years, reviewing whether the stakeholder groups and their evaluations had changed.

We sent the entire list of potential material impacts to the stakeholder and asked them to evaluate how relevant each impact was for them. In follow-up, we organised a video call with each stakeholder to discuss their evaluations and understand their perspectives.



# Materiality analysis

## The result

The outcome was a comprehensive list of potentially material impacts, risks and opportunities. To determine which of these are truly material, we assessed each aspect individually. Impacts were evaluated based on their severity, which includes scale, scope and, for negative impacts, irreversibility. If the impact was classified as potential, we also considered the likelihood of its occurrence. Risks and opportunities were assessed based on the potential magnitude of financial impact and the likelihood of occurrence. The result of the stakeholder dialogue has been taken into account in the assessment of the severity of the impacts.

After evaluating each of the impacts, risks and opportunities, we grouped the major ones and derived our 11 material topics based on this. The result was discussed with the leadership team and approved.

### Impact materiality

Material topic	GRI standards	Impacts	Actual/potential	Positive/negative
<b>Economic Performance</b>	201	Consideration of social and environmental issues in all purchasing and sales decisions	actual	negative
		Knowledge transfer through partnerships	actual	positive
<b>Governance</b>	2-30, 205, 406, 418	Formalization of ethical principles formulated in CoC (non discrimination, anti corruption, collective bargaining and personal data security)	actual	positive
<b>Supplier Assessment</b>	308, 414	Limited traceability in global supply chain	actual	negative
		Consideration of social and environmental factors in the supplier assessment	actual	negative
<b>Material</b>	301	Using virgin fossil fuel based supplies	actual	negative
<b>Energy</b>	302	High resource usage due to energy intensive production processes	actual	negative
<b>Emissions</b>	305	Insufficient emission reduction plan towards Paris agreement	actual	negative
		VOC emissions in production	actual	negative
		Negative contribution to climate change through fossil based gas consumption	actual	negative
		Providing products for climate damaging industries	actual	negative
		Uncertainty about scope 3 emissions	actual	negative
<b>Waste</b>	306	Supporting circular economy by producing recycable products	actual	positive
		Environmental pollution due to material leakage	actual	negative
<b>Occupational Health and Safety</b>	403	Risk of increased illness rate due to insufficient additional health and safety management	actual	negative
<b>Training and Education</b>	404	Awareness of employees regarding sustainability issues	actual	negative
		Insufficient consistency in regular training and education plan for employees	actual	negative
<b>Diversity and Equal Opportunity</b>	405	DEI (diversity, equality and inclusion) in the company	actual	negative
		Uncertainty about gender pay gap	actual	negative
<b>Consumer Health and Safety</b>	416	Improved protection of food by packaging	actual	positive

### Financial materiality

Material topic	GRI standards	Impacts	Actual/potential	Positive/negative
<b>Economic Performance</b>	201	Unclear cost development due to new types of taxes such as environmental taxes (plastic taxes, etc.)	Long-term	Risk
		Changing consumer and customer preferences and the associated risk of losing market share	Long-term	Risk
		Increased costs due to possible damage caused by severe weather events	Long-term	Risk
		Variable energy prices lead to unpredictable costs	Medium-term	Risk
		Increasing regulatory requirements and associated sanction risks	Long-term	Risk
		Higher competitive pressure with regard to ESG	Long-term	Risk
		Higher risk classification and poorer conditions if ESG requirements of banks are not met	Long-term	Risk
<b>Supplier Assessment</b>	308, 414	Limitations due to complexity in the supply chain	Long-term	Risk
		Financial benefit and competitive advantage through increased transparency	Medium-term	Opportunity
<b>Material</b>	301	Competitive advantage by offering products with innovative products to satisfy packaging trends	Medium-term	Opportunity
		Contribution to the circular economy (design for recycling and recycled content)	Long-term	Opportunity
<b>Energy</b>	302	Cost advantage due to increased energy efficiency	Medium-term	Opportunity
<b>Waste</b>	306	Increased restrictions for hazardous waste material disposal	Long-term	Risk
		Dependence on recycling industry in innovation processes	Medium-term	Risk
<b>Training and Education</b>	404	Shortage of skilled workers	Medium-term	Risk

# Methodology

This Sustainability Report has been prepared with reference to the Global Reporting Initiative (GRI) Standards 2021 using the double materiality assessment of the European Sustainability Reporting Standards. The information and data refer to all production sites manufacturing flexible packaging solutions as well as the company headquarters in Wiener Neudorf, Austria. The reporting period ranges from 1 January 2023 to 31 December 2023, unless indicated otherwise.

The corporate boundary is defined by adapa Holding GesmbH; for each material topic the overall objective, boundaries, management approach, due diligence and key performance indicators (KPIs) are specified. The Sustainability Report has been prepared based on the fundamental principles outlined by the GRI to guarantee the completeness and quality of the provided information. Further, this Sustainability Report serves as our Communication on Progress (COP) to the United Nations Global Compact. We have decided not to have this sustainability report externally audited.

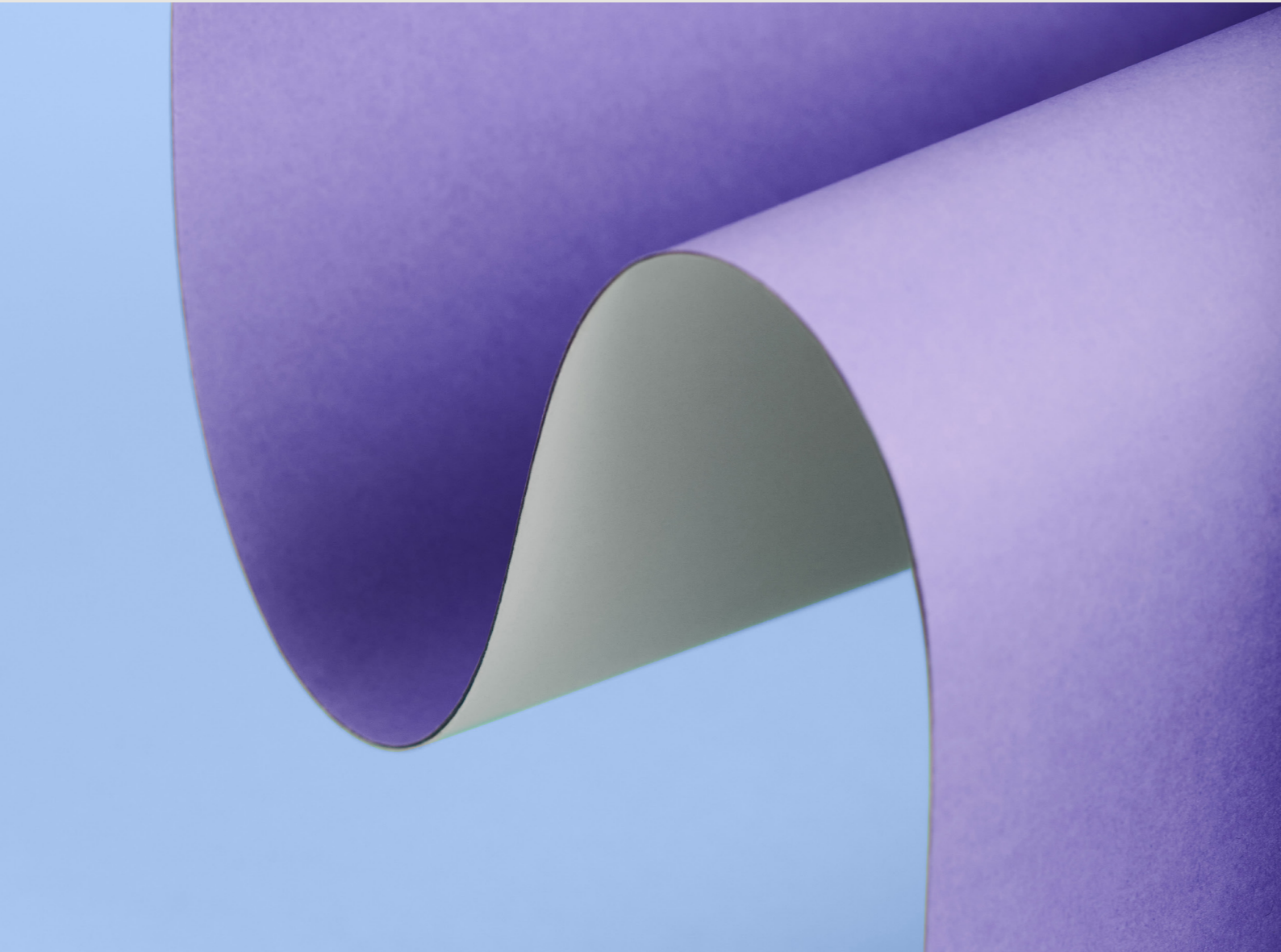
# Structure of the report

The material topics presented and described within this report are structured according to our 4Ps logic: Purpose, People, Planet and Prosperity. This logic is a result of a Group-wide project, in which we redefined the Group identity and promoted stronger Group thinking. These four dimensions shape the strategic future of adapa. To integrate our 4Ps logic in the ESG (environment, social, governance) structure, we divided the Ps into the pillars. Planet is part of the environmental pillar, People part of the social pillar, Prosperity part of the governmental pillar and Purpose part of the introduction. The structure of this report follows the 11 relevant material topics. The material topics are assigned to one of the 4Ps. At this point, it is essential to mention that the 4Ps are strongly interconnected and the assignment of one material topic to a particular 'P' does not necessarily mean it is not relevant to another P. The assignment took place based on the main objective of the material topic.

Each material topic is represented by:

- an overall objective to which it is aligned more generally;
- the boundaries for which it is relevant;
- the strategic objectives that support achievement of the overall objective;
- the management approach and the internal responsibilities;
- its impacts, risks and opportunities and the due diligence process;
- KPIs to give insights about the status quo;
- current projects to further develop the topic and achieve the overall objective.

This work serves as a basis for making our objectives more precise and specific and for improving our monitoring system.



## SDGs



## UNGC





# purpose

## Our best for your goods.

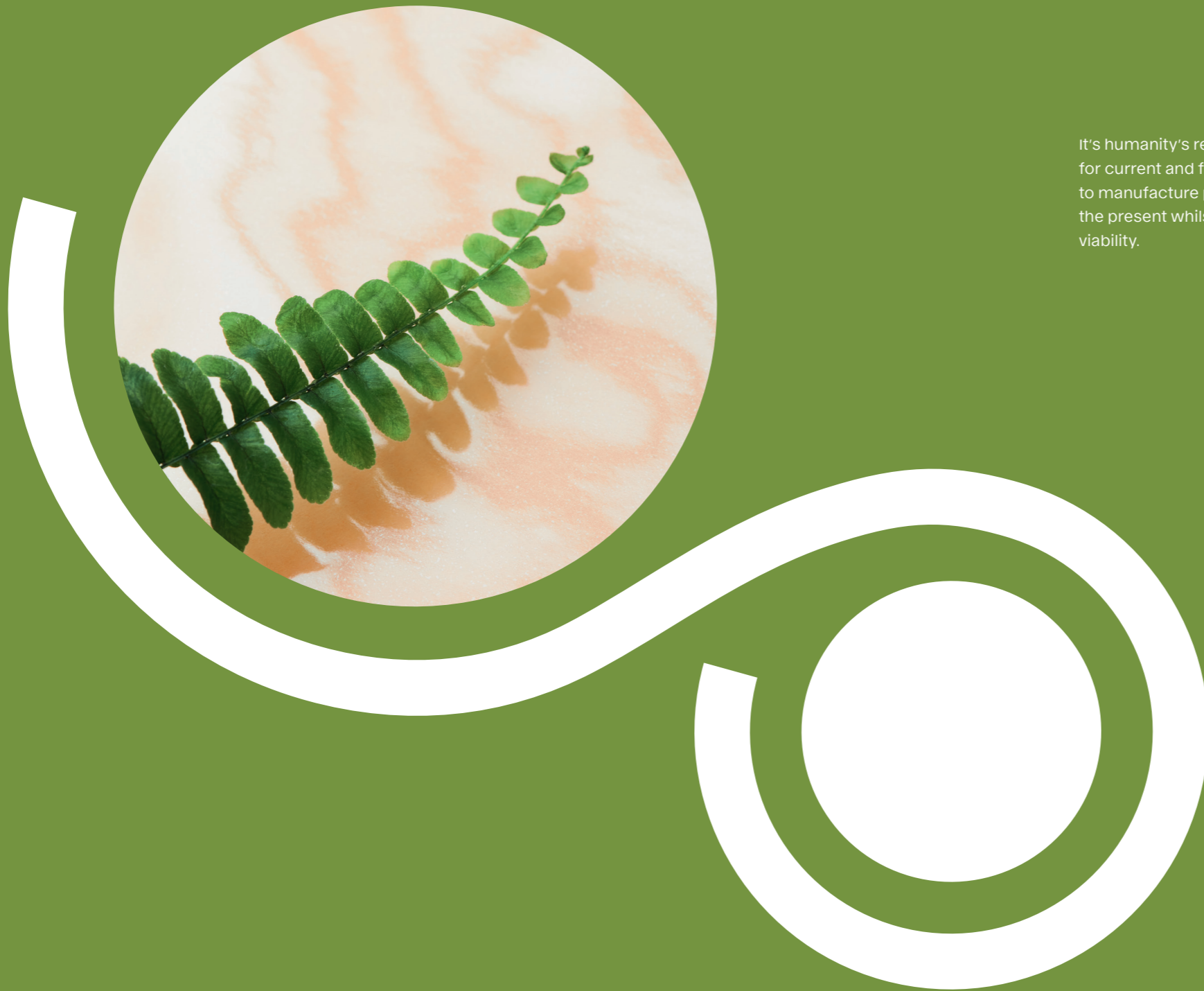
Purpose is our central pillar. It is the element that aligns every one of our employees in their different roles and leads us on our co-creational journey. It encompasses why we do what we do and outlines our core reason of existence. Purpose gives meaning and invites all our employees to contribute to the maximum of their capabilities.

Today's world requires adaptation to rapid change. At adapa, we face this challenge and play an active role in shaping the future of the flexible packaging

industry. Therefore, we dare to move out of our "business as usual" comfort zone and work to achieve the outstanding results that we all strive for.

Purpose – along with its accompanying field of values – allows the adapa Group to grow together into one organism. Within our purpose-driven organisation, we aim to fulfil the objectives and targets defined by our three strategic fields of action: People, Planet and Prosperity.

# enviromental planet



It's humanity's responsibility to protect the planet for current and future generations. Our ambition is to manufacture products that support the needs of the present whilst not harming the planet's future viability.

Therefore, all employees are asked to strive for accelerating innovation that can reduce our products' environmental impact without jeopardising their quality and safety.

The pillar "environmental" underlines the passion of each and every employee at adapa for making the planet a better place. Together as a team, we create a more sustainable present for a liveable future.

## Material topics

- Emissions
- Energy
- Waste
- Materials

# Topic: Emissions

## Overall objective

We would like to reduce our emissions across the board, set goals for them in line with the Paris Agreement on limiting global warming and become a greenhouse gas (GHG) emission neutral company.

## Boundaries

At the moment, we have reliable information on Scope 1 and 2 emissions.

## Management approach

A substantial reduction of GHG is required to keep the rise in the earth's temperature well below 1.5°C compared to pre-industrial levels. GHGs are not the only thing that contributes to climate change. Emissions of volatile organic compounds (VOCs) are just as important. The greenhouse gas potential of VOCs is several times higher than carbon dioxide. To tackle the emissions of VOCs, we strive to minimise the use of solvents, recover them or increase the emission efficiency of exhaust treatment. Renewable energy is also important in reducing the carbon dioxide levels in the air. As the price of green energy certificates increased significantly in 2023 we searched for other alternatives solutions like PPAs in combination with an agreement on energy balancing to achieve our goal of procuring 100 per cent of our energy from renewable sources. Regarding mobility, we limit our travel and increase the number of online meetings whenever possible. Our car policy favours electric vehicles given the average driving range is sufficient for the intended use.

## Due diligence

Through our materiality analysis, we have identified our negative impacts on this topic. As a flexible packaging producer, electrical energy is required for the extrusion of our films, whereas for the printing and lamination production steps, natural gas is also used. During our printing and lamination process VOCs are emitted due to the evaporation of solvents in inks and adhesives. To mitigate this impact, we invest in new technologies, approaches and improve our solvent exhaust systems. We successfully tested water-based lamination adhesives and water-based inks, but for the time being these are only employed with paper-based materials as substrates.

To contribute to the Paris Agreement target, our goal is obtain 100 per cent of our energy from renewable sources and develop a GHG emission reduction plan to evaluate and implement measures to mitigate our negative impact. Although evaporating solvents/ water by heating with electrical energy is less efficient, we take into consideration this solution to remediate our impact due to the consumption of fossil-based gas.

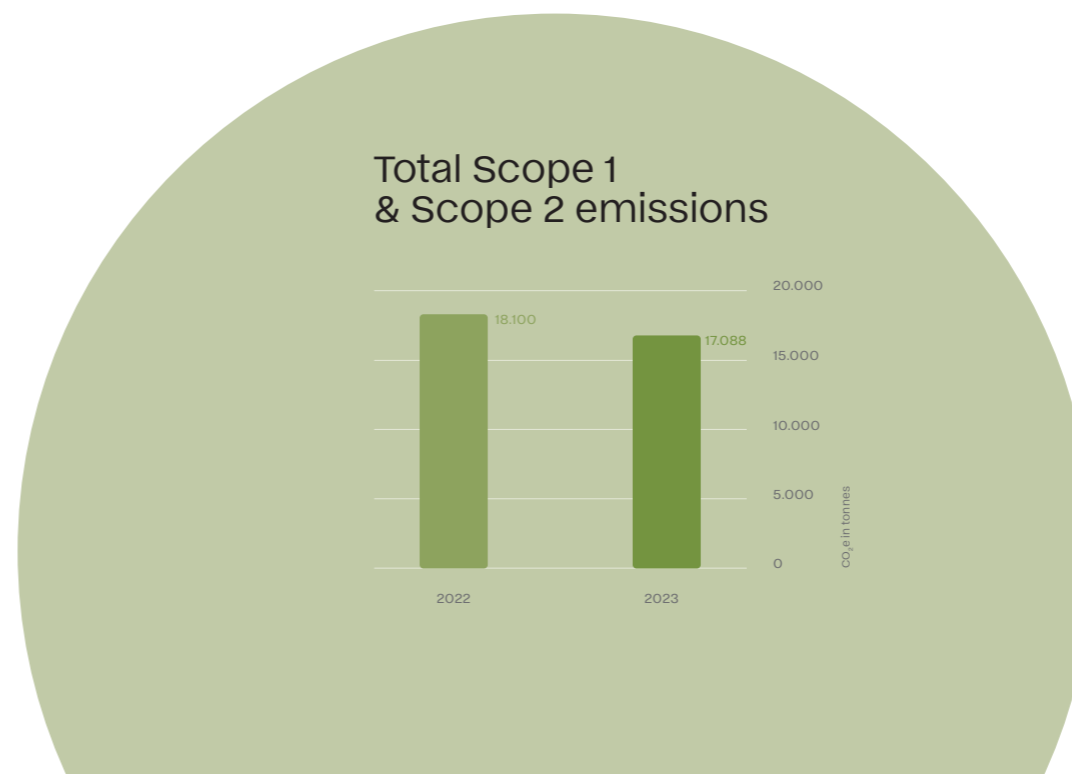
Plastics, such as those we are using in our products, have a high Scope 3 impact. We strive to reduce our impact to the lowest value possible by the reduction of virgin plastics and by increasing the recycled content in our materials or using raw materials from renewable resources (second generation).



## SDGs



## UNGC



**-5,6 %**

Our group's total Scope 1 and Scope 2 emissions decreased by -5.6 per cent from 2022 to 2023.

## KPIs

Emissions intensity	CO <sub>2</sub> e in tonnes	2023	2022
Scope 1 and Scope 2 emissions intensity		0,16	0,15

The emissions intensity indicator relates the total scope 1 and scope 2 emissions to the weight of sold products in tonnes (tCO<sub>2</sub>e / tonnes)

Scope 1 & 2 emissions	CO <sub>2</sub> e in tonnes	2023	2022
<b>Total emissions (Scope 1 &amp; 2)</b>		<b>17,088</b>	<b>18,100</b>

Scope 1 emissions	CO <sub>2</sub> e in tonnes	2023	2022
Burning fossil and biogenic fuels for heat, steam and electricity		12,474	15,833
Vehicle fleet		1,277	869
Refrigerants		127	254
<b>Scope 1</b>		<b>13,878</b>	<b>16,957</b>

Scope 2 emissions	CO <sub>2</sub> e in tonnes	2023	2022
Electricity		3,096	947
District heating*		114	196
<b>Scope 2</b>		<b>3,210</b>	<b>1,143</b>

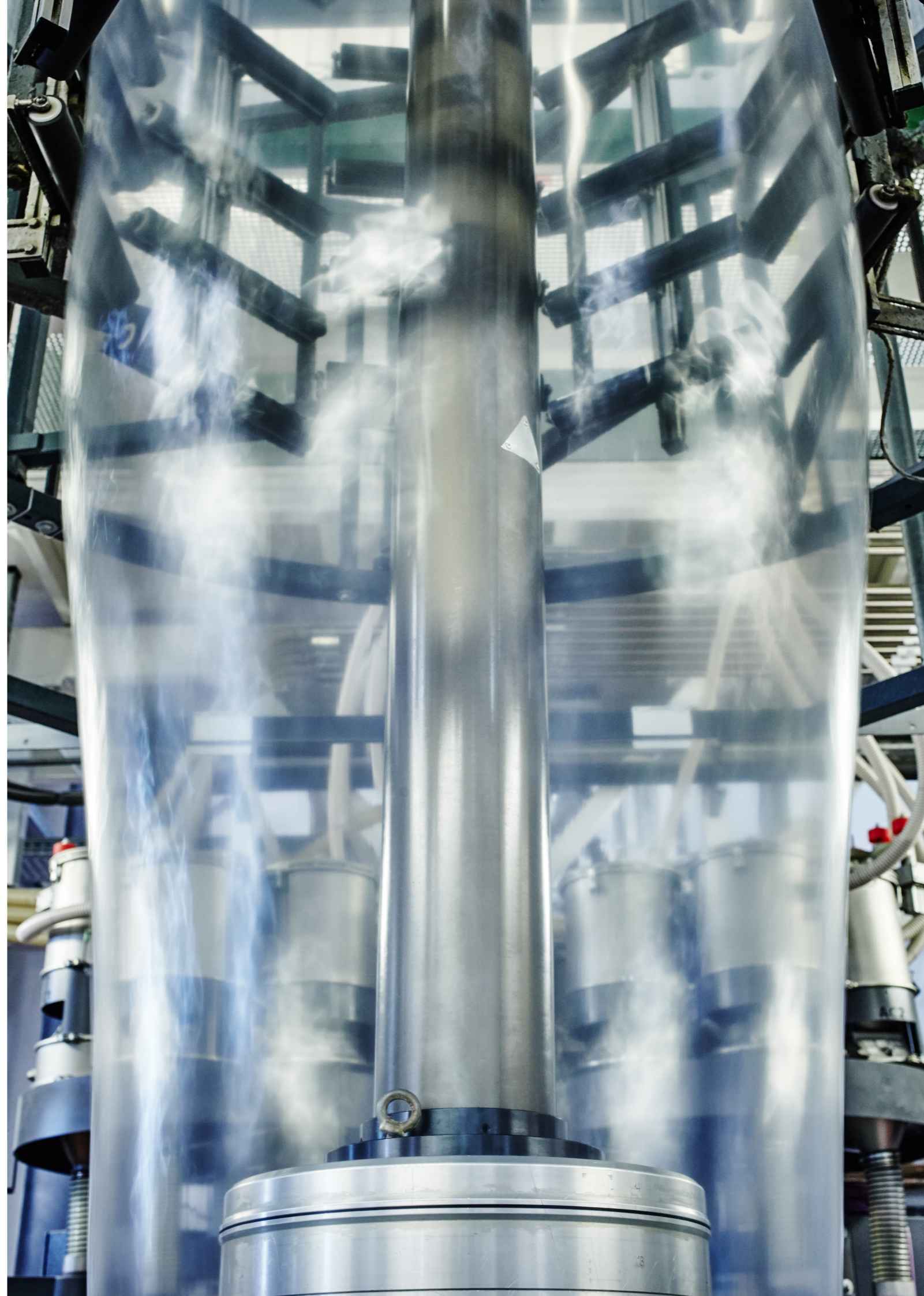
In 2022 100 per cent of energy was from renewable sources and 79.3 % in 2023 due to a significant increase in costs. In 2022 the cost of a green certificate was reasonable, but as this increased in 2023 we could economically not maintain our 100 per cent target. However, adapa has begun searching for other alternatives to achieve the goal to use 100 per cent renewable energy.  
\* Scope 2 includes amounts of district heating from adapa Films Kempton GmbH & Co.

Vehicle fuels		in litres	2023	2022
Quantity of fuel used	Ad Blue		1,179	2,498
	LPG		2,219	20,290
	Gasoline		111,311	74,248
	Diesel		362,679	189,374

As we moved into a post-Covid normalisation, the customer visits increased in 2023, resulting in increased consumption of certain types of fuel.

## Projects

1. Emission efficiency of exhaust treatment
2. Upgrades to solvent recovery
3. Water-based cleaning equipment
4. Analysis for investments in solar energy



Emissions project

# Emission efficiency of exhaust treatment

**Context**

With our aim of maximising our contribution to a circular economy and the reduction of GHG emissions, we decided to replace our current regenerative thermal oxidisers (RTOs) at adapa Netherlands Amersfoort and adapa Poland Bogucin with new ones that will further reduce the emission levels in our production processes and meet the best available technology guidelines regarding emission values. With our new three-chamber RTOs, which are designed to maximise energy efficiency through an inflow pre-heating of combustion heat recovery, VOCs are incinerated to reduce direct GHG and odorous emissions created during our industrial processes.

**Description**

VOCs are released by evaporation when solvent-based inks are used in printing. The RTO air purification device is the ideal solution for the abatement of volatile organic substances present in our industrial emissions. With the installation of the RTO in the exhaust air stream of printing presses the extracted air from the chimney will be practically odour-free and solvent-free. Solvent is completely oxidised in the RTO and the energy contained in the exhaust air flow will be fully converted into heating energy. The RTO, consisting of three recovery chambers filled with structured ceramic material, has a high degree of thermal utilisation (> 96 per cent) and an exceptional high clean-up efficiency (> 99 per cent). The building and environmental permit process has begun. The installation and project will be completed in 2024.

Emissions project

# Upgrades to solvent recovery

**Context**

We make every effort to support the circular economy. The solvent recovery plant upgrades at adapa Greece Komotini serve as a best-practice example. It has successfully met its sustainability objectives by reducing solvent purchases, ensuring VOC emission compliance, improving energy efficiency and minimising waste. These achievements highlight the importance of sustainable practices in industrial operations, providing both environmental and economic benefits.

**Description**

The solvent recovery plant upgrades aim to enhance sustainability by optimising solvent use, improving VOC emission targets and reducing the overall environmental impact. The upgrades significantly improved the solvent recovery process, achieving a 250 per cent recovery rate (kg/kg) and a 100 per cent reduction in annual solvent purchases. With this high efficiency, dependency on the supply of new

solvents was reduced, resulting in cost savings and resource conservation. The installation of advanced solvent recovery units and the upgrades described reduced the amount of VOCs emitted, ensuring compliance with the strictest environmental regulations and supporting our efforts to protect the environment. Thanks to the integrated high-efficiency heat exchangers, the in-house nitrogen generation plant and optimised control system, a 10 per cent reduction in energy consumption was achieved, resulting in a smaller carbon footprint and lower operational costs. Also, by improving and upgrading our recovery system, the generation of hazardous waste was drastically reduced, contributing to better waste management practices. The project has been studied, outlined and overseen exclusively by the adapa Greece Komotini technical department. The environmental benefits of this upgrade are significant, demonstrating our efforts to reduce emissions.



Emissions project

# Water-based cleaning equipment

**Context**

VOCs are volatile organic compounds present in solvents used in our processes. To tackle the emissions of VOCs, we strive to minimise the use of solvents. As part of these efforts, we have purchased a new water-based washing machine for cleaning the ink-carrying parts of our printing machine and will be removing our solvent-based hand-wash area.

**Description**

Ink-carrying components like printing plates and cylinders that are removed from the printing machines after a job change need to be cleaned. And because print runs are becoming shorter,

necessitating frequent job changes, there are also more parts that need to be washed. We will be replacing our current solvent-based rinsing machine operating in adapa Amersfoort with a new water-based machine. The project is ongoing and scheduled for completion in 2024. With the new cleaner equipment and the removal of the solvent-based hand wash area, we will reduce our VOC emissions and create a healthier environment for our employees.

Emissions project

# Analysis for investments in solar energy

**Context**

Our most important lever to reduce our operational carbon footprint is the use of a mix of renewable energy. In 2022, the cost of purchasing a green certificate was reasonable, and adapa used 100 per cent renewable energy. But as this price of a certificate increased significantly in 2023, we began searching for other alternatives to achieve our goal of procuring 100 per cent of our energy from renewable sources.

**Description**

In 2023, we looked into installing solar cells at some of our sites, but the total cost for preparation and installation proved to be high in our initial studies, and our focus has therefore shifted to making the switch to solutions under Power Purchase Agreements (PPAs) in combination with an agreement on energy balancing. Solutions and agreements for this are already in the works.



# Topic: Energy

## Overall objective

Our aim is to minimise our energy consumption and rely on renewable sources.

## Boundaries

The material topic 'Energy' covers energy consumption and looks at the production processes and machines used. Emission efficiency and renewable energy are covered under 'Emissions'.

## Management approach

To achieve the overall objective of this material topic, we are investing in new equipment and energy-saving technologies that increase our energy efficiency. In case of machine or part replacement, we opt for equipment with superior energy efficiency. We strive to have detailed energy metering within all our production sites. By having

more insight into the energy consumption of each discrete plant component, more efficient reduction measures can be identified.

## Due diligence

In all production stages, and especially in extrusion, printing and lamination, a lot of energy is required. Having more information on the energy consumption at each site and machine, we mitigate our impact by increasing our energy efficiency and investing in new equipment with superior energy efficiency. High efficiency reduces energy consumption and lowers costs. To remediate our impact, we are focusing on investments in solar energy, and solutions are already in the works under PPAs (power purchase agreements) in combination with an agreement on energy balancing.

## KPIs

Energy	2023	2022
Total amount of electricity purchased in kWh	102,005,948	100,243,810
Energy intensity	0.98	0.83

The energy intensity indicator is the total electricity purchased in relation to the weight of sold products (kWh / kg)

## Projects

1. Energy efficiency in adapa Poland Bogucin
2. Phaeton

### SDGs



### UNGC



Energy project

# Energy efficiency in adapa Poland Bogucin

**Context**

Reduction is a major lever to address our business'carbon footprint. Placing this at the forefront, we make every effort to minimise our energy consumption.

**Description**

In our production plant in Poland we replaced the old compressor of our central compressed air system with a new one with a heat exchanger to recover the process heat to heat the facility water cycle for heating and hot water. The integration of production process heat will reduce our local consumption of additional facility heating energy. The project was completed in 2023.

In our converting machines in Poland we reduced the number of vacuum pumps (side-channel blowers). Some of our converting lines run with two vacuum pumps per machine, while the new generation machines have just one. We modified all machines originally equipped with two vacuum pumps to operate with one. This change reduced the energy consumption by vacuum pumps by 50 per cent per machine. By using smaller pipe diameters for the system we were able to maintain the vacuum performance. Additional check valves have been installed to identify and prevent potential leaks. The project was completed in 2023.

Energy project

# Phaeton

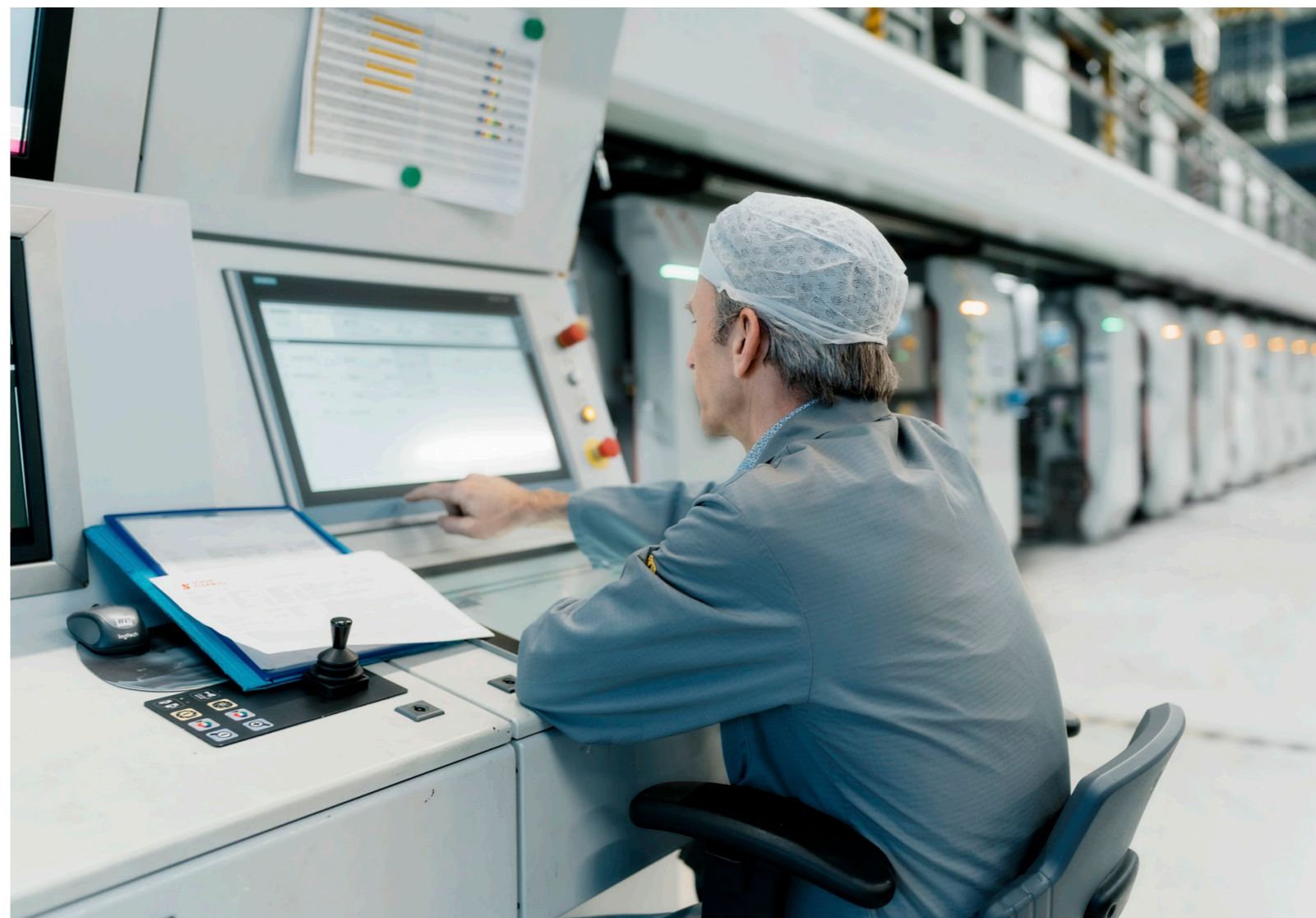
**Context**

Aiming to increase our energy efficiency, we are investing in new, state-of-the-art equipment with superior energy-efficiency.

**Description**

adapa is creating a centre of excellence in confectionary packaging by reducing the number of production plants from three to two. With our new equipment and with just two plants we plan to increase printing capacity by 20 per cent with no accompanying increase in energy consumption. 2023 was the year of preparations.

The new equipment (a rotogravure press, a slitter, a washing machine and a distilling unit) was ordered, whilst the purchase of an automated palletising unit for final product is still under review. Construction also began on the foundation, basement and roof for the building to house the printing department. The project was organised in-house, mainly by the local maintenance department and the managing director (who is also the project leader), supported by production management, logistics and adapa Group engineering. Equipment will be installed and construction work will be completed in 2024.



# Topic: Waste

## Overall objective

As a flexible packaging manufacturer, we would like to prevent waste generation. We are expanding our cooperation with stakeholders along our value chain to accelerate the circular economy and develop products that are recyclable at scale.

## Boundaries

This material topic focuses on our internal and external waste management, whereas the product design aspects for resource efficiency are covered under the topic 'Material'.

## Management approach

Waste from our production activities may pollute the environment if not disposed of correctly. Where this can be done, we recycle our production scrap to minimise waste generation; Waste from our own activities which cannot be recycled internally is managed by third-party waste management companies. We are also taking action at our production sites to avoid the leakage of waste into the environment. We support Operation Clean Sweep (OCS) and prevent plastic granulates like pellets, powders and flakes from getting into the environment. Waste is managed by the different departments directly and arranged by the dedicated operations committees.

## Due diligence

To avoid pollution due to material leakage and reduce our impact, measures are in place at each production site. Where possible, we recycle our production scrap to minimise waste generation, and we handle plastics carefully to prevent plastic granulates from getting into the environment. By supporting OCS, we demonstrate our responsibility and awareness on this topic.

As waste reduction is of critical importance, the restrictions in place for hazardous waste disposal and our reliance on the recycling industry are increasing. Although there is uncertainty regarding investments due to quality and market limitations, we need to find and evaluate innovative solutions, focus on technical feasibility and invest in new technologies that meet regulations and recyclability requirements. To mitigate the risks and accelerate circular economy, we cooperate and share knowledge throughout the entire value chain of packaging.

## Projects

1. Operation Clean Sweep
2. Waste reduction and quality improvements – doctor plate stripes
3. Waste reduction and quality improvements – impression roller marks
4. Waste reduction and quality improvements – wrinkles from lamination

### SDGs



### UNGC



## KPIs

		in kg	2023	2022
Waste treated internally			7,364,411	6,970,814
Waste treated externally			15,937,863	17,380,542
Hazardous waste	Treated internally	Reuse	45,000	45,000
		Recycling	792,824	607,525
		Recovery	2,253,000	2,181,046
		Incineration	357,293	344,390
		Other		21,672
	Treated externally	Reuse	25,351	0
		Recycling	247,899	263,535
		Recovery	615,227	632,895
		Incineration	387,635	256,939
		Other	3,333	179,604
	No information available		143,717	
Hazardous waste	Treated internally	Reuse	0	0
		Recycling	3,866,147	3,771,181
		Incineration	50,147	0
		Landfill	0	0
		Other	0	0
	Treated externally	Reuse	1,009,744	681,149
		Recycling	8,156,903	8,428,779
		Recovery	2,764,253	1,598,045
		Incineration	1,940,168	2,285,792
		Landfill	787,220	1,383,236
	Other	120	1,457,285	
	No information available		69,566	

In 2023 our data is more precise, as we have more detailed information due to the increased involvement of all our sites. This demonstrates an improvement in our efforts to reduce the waste generated by our operations.

Waste project

# Operation Clean Sweep

**Context**

Preventing plastic from our production sites from getting into bodies of water and the soil is of great importance for the plastics manufacturing industry. Plastics Europe demonstrates its commitment to zero pellet loss with its voluntary initiative, Operation Clean Sweep (OCS). We support this commitment through our Group-wide pledge.

**Description**

The aim of OCS is to prevent plastic granulates like pellets, powders and flakes from getting into the environment. This programme has various benefits, from its positive contribution to preserving water quality and wildlife to employee safety and operational efficiency. Although, as a plastic packaging converter in Europe, we belong to a group whose pellet loss is negligible, we want to demonstrate responsibility for the careful handling of plastics in daily operations. To demonstrate our awareness for the topic of plastics entering the environment, we made a commitment to uphold the aims of the OCS initiative at all our sites, also the sites that focus on slitting and printing.

Waste project

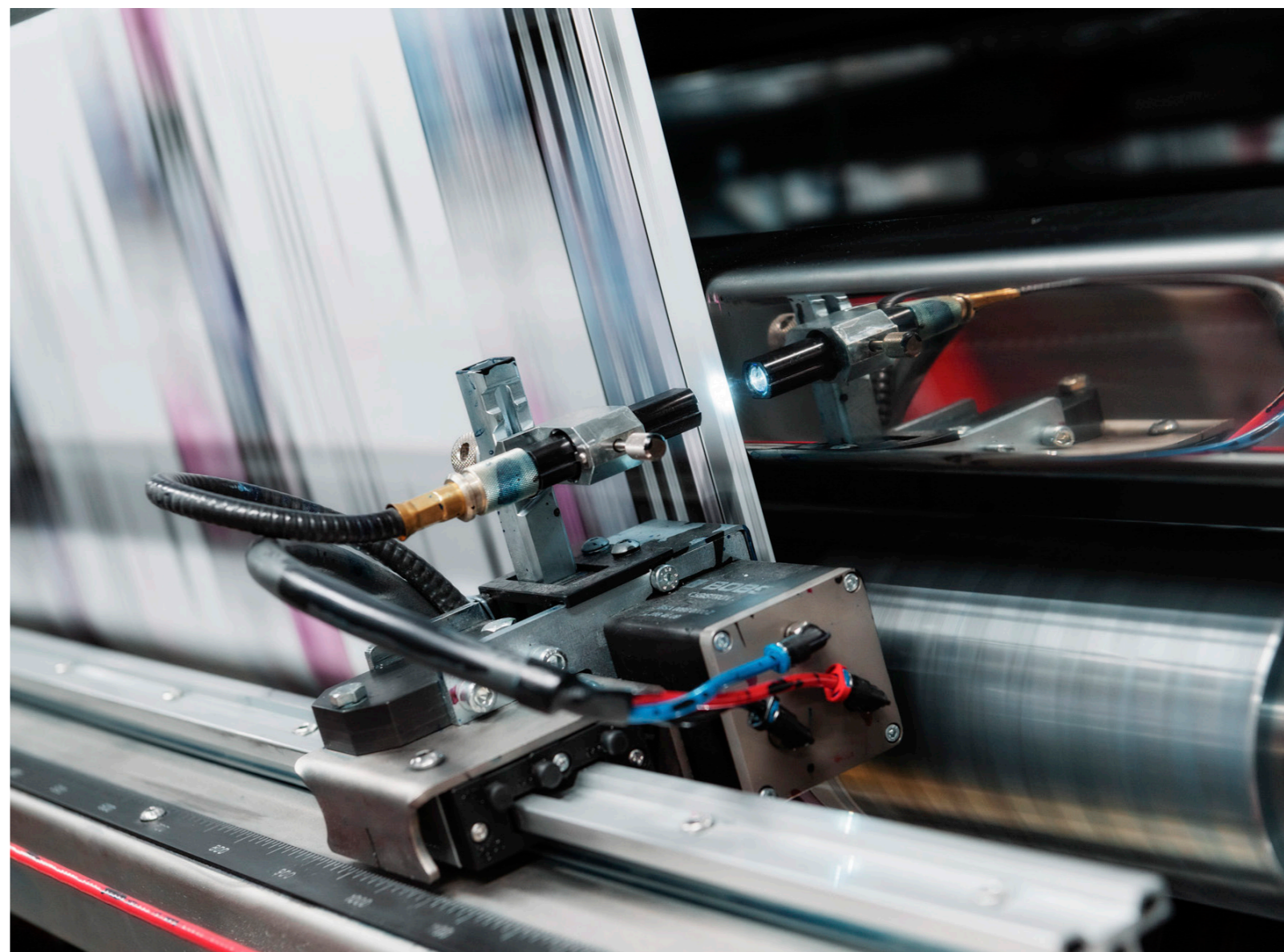
# Waste reduction and quality improvements – doctor blade stripes

**Context**

In our production in Leek we identified as part of our continuous improvement process the potential to reduce waste due to recurring stripes and scratches on the printing caused by the doctor blade in the rotogravure press. This project reduces the waste of materials that would have to be rejected and remanufactured due this problem.

**Description**

The improvement project was analysed by our technical project team in an A3 charter to identify possible root causes for printing errors caused by doctor blade stripes. Under the action plan a preventive measure was implemented by installing appropriate filters in the ink systems. The particles causing the scratches and strips were removed in the process and material rejection due to doctor blade stripes has been reduced by 75 per cent. The project and action plan were carried out in 2023.



## Waste project

# Waste reduction and quality improvements – impression roller marks

### Context

The T&T (track & trace) area is a small black box printed on all packaging for tobacco products. This box is used by the customer to apply a legally mandated laser identification (ID) code using very small dots. Every flaw in this printed black box results in material rejection in our factory and at the customer's facility where the tobacco pouch would be automatically rejected on their packaging line. This project reduces the waste of materials which would have to be rejected and remanufactured due to the impression marks.

### Description

The improvement project was assessed by our technical project team in an A3 charter. The aim of the project was to identify possible root causes for

impression roller marks and perform an analysis to identify the most likely root causes, including an action plan to solve the issue.

The root cause is micro-contaminants like dust on film due, for example, to electrostatics which often occur in the printing production environment. The T&T area was originally printed at the first black ink printing station with other black images. The impact of dust and impression roller marks is also higher at the 1<sup>st</sup> printing station. By adding an extra black printing cylinder for printing the black box and adjusting the cylinder engraving, we reduced the impression roller marks and waste rejects significantly (94 per cent). The project and action plan were carried out in 2023.

## Waste project

# Waste reduction and quality improvements – wrinkles from lamination

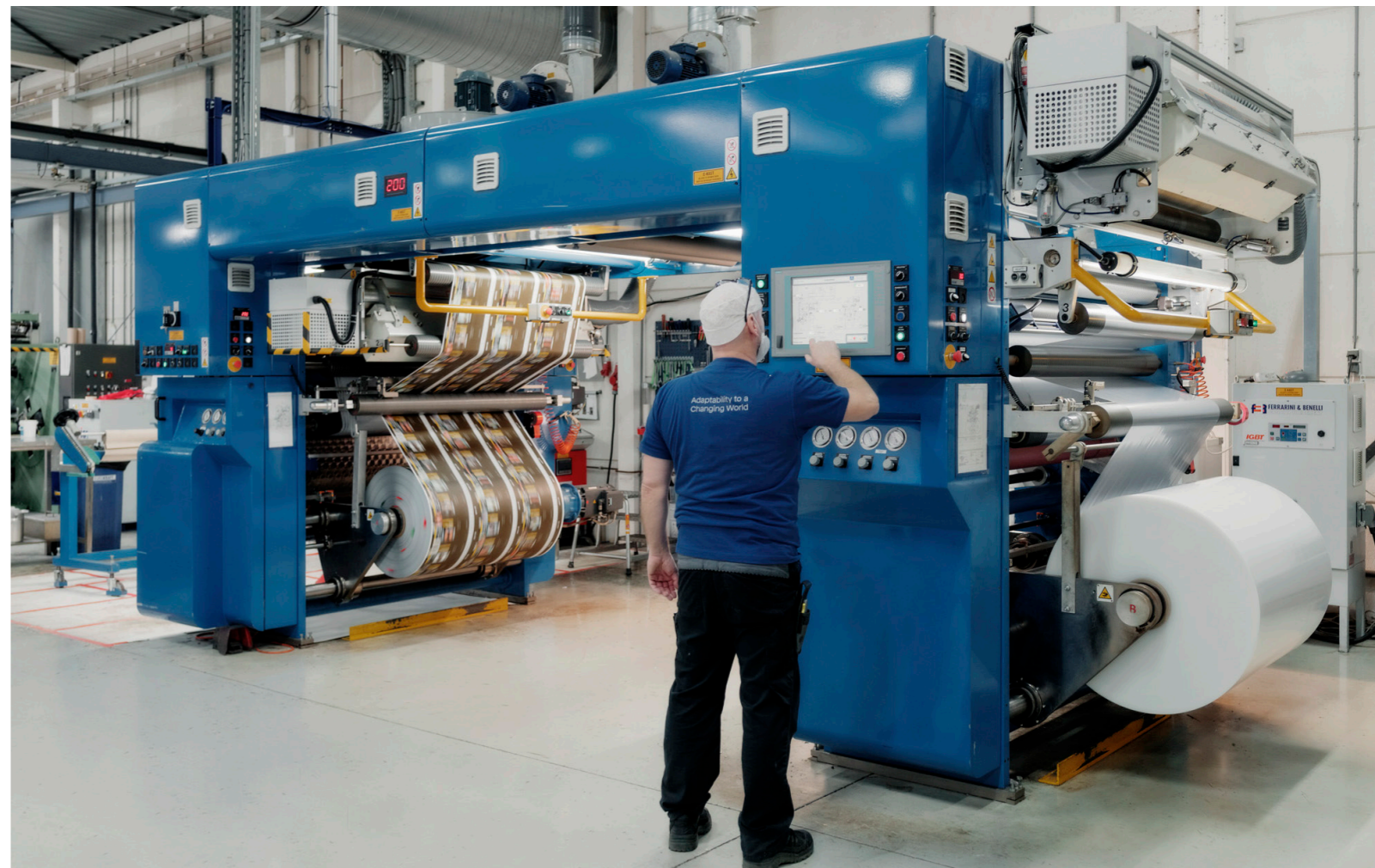
### Context

At our production site in Slagelse and during the lamination of two specific films, biaxially oriented polypropylene (BOPP) film and aluminium foil (alufoil), wrinkles occurred, mainly near the reel core, making it necessary to reject the material. By identifying the root cause and making the appropriate quality improvements, we significantly reduced the amount of material waste.

### Description

The improvement project was analysed by our technical team. Due to the elasticity of BOPP in combination with alufoil, wrinkles occurred when laminating these two films. The root cause was related to the lamination machine, along with

issues concerning storage, the drying conditions, the handling of the reels and the slitting process. Regarding lamination, the machine and the winding tension were optimised, and improvements were made by replacing rollers and adjusting all idle rollers. Modifying the storage conditions, making adjustments to the curing process, the use of cranes to handle the material and measures to avoid damage caused by the compression of layers were also key to solving the problem. The slitting machine needed also to be considered. By increasing the speed and replacing the idle rollers, we optimised the slitting process. These improvements and adjustments have allowed us to reduce the amount of waste material generated internally. The project and action plan were carried out in 2023.



# Topic: Materials

## Overall objective

We contribute to the circular economy by increasing the recycled content in our products in favour of a reduced amount of virgin plastic materials. In general, we seek to minimise the amount of fossil-based raw materials we use.

## Boundaries

This material topic focuses on input materials and the circular economy.

## Management approach

We support the circular economy by designing our products with an eye towards recycling and reduce our reliance on finite resources by increasing the recycled content in our products. Focusing on the technical and economic feasibility and evaluating all possible alternatives, we are working together with stakeholders across the entire value chain on solutions for tomorrow and engaging with industry interest groups like Circular Economy for Flexible Packaging (CEFLEX) and associations like Flexible Packaging Europe (FPE). To test innovative food packaging materials with an increased recycled and renewable content, we are also part of pilot projects together with industry partners. Additionally, most of our sites have International Sustainability & Carbon Certification (ISCC PLUS) or Forest Stewardship Council (FSC) certification. Such certifications are

required for products derived from circular, bio-based and renewable materials. They provide a chain of custody from the raw material supplier to the end consumer.

To accelerate the circular economy, we develop sustainable packaging solutions ready for recycling according to the CEFLEX Design for a Circular Economy (D4ACE) or similar guidelines. Using the RECYDA recyclability assessment software helps us define the appropriate product design, while the product environmental footprint (PEF) calculation enables us to balance out parameters in recipes to help protect the environment.

## Due diligence

Plastics are fossil fuel-based materials. To conserve resources and mitigate our environmental impact, we aim to minimise the use of virgin fossil-based materials and increase the recycled content in our materials or use raw materials from renewable resources (second generation). The use of recycled materials in the majority of our product segments is limited due to the lack of food-grade recycled materials. We contribute to the circular economy by designing products with an eye towards recycling and gain a competitive advantage by being able to offer alternative innovative products to reflect trends in packaging.



## KPIs

	in kg	2023	2022
Total weight of products sold		103,969,336	120,846,836
Total weight of materials used to produce our primary products	Non-renewable materials used	104,397,779	123,058,037
	Renewable materials used	16,526,971	14,171,054
Total weight of materials used to package our primary products	Non-renewable materials used	884,092	990,673
	Renewable materials used	4,347,315	4,939,963
Industrial waste recycled and used internally		3,281,403	4,581,325

There has been a decrease in our products sold due to market changes.

## Projects

1. Chemical PCR– implementation of PE grades following the (ISCC PLUS) certification scheme
2. Mechanical PCR– implementation of PE grades
3. ISCC PLUS
4. Stakeholder involvement
5. Flex4Loop

### SDGs



### UNGC



### Materials project

# Chemical PCR – implementation of PE grades under the ISCC PLUS certification scheme

#### Context

To conserve resources and contribute to a more sustainable future, we focus on alternative products with chemically post-consumer recycled (CPCR) content, supporting the circular economy.

#### Description

We replaced 67 per cent of PE used in PE based tobacco pouches by chemically recycled grades in mass balance, supporting a reduction of the use of virgin polymer grades. All related sites within the adapa Group, purchasing (polymer sourcing), extrusion (adapa Denmark Bjert) and converting (adapa Netherlands Leek) were accredited

according to International Sustainability & Carbon Certification ISCC PLUS. The selection of suppliers who were able to deliver the relevant grades in sufficient quantities in mass balance was also essential. To evaluate and select the appropriate supplier and obtain customer approval, tests with the corresponding mass balance grades were performed at both extrusion and converting sites. All activities from the selection of suppliers to approval were managed by Group R&D, the relevant sites and the customer, whereas the ISCC PLUS certification was overseen by the quality manager and the sites. The next step is to obtain customer approval for alternative suppliers by the end of 2024.

### Materials project

# Mechanical PCR implementation of PE grades

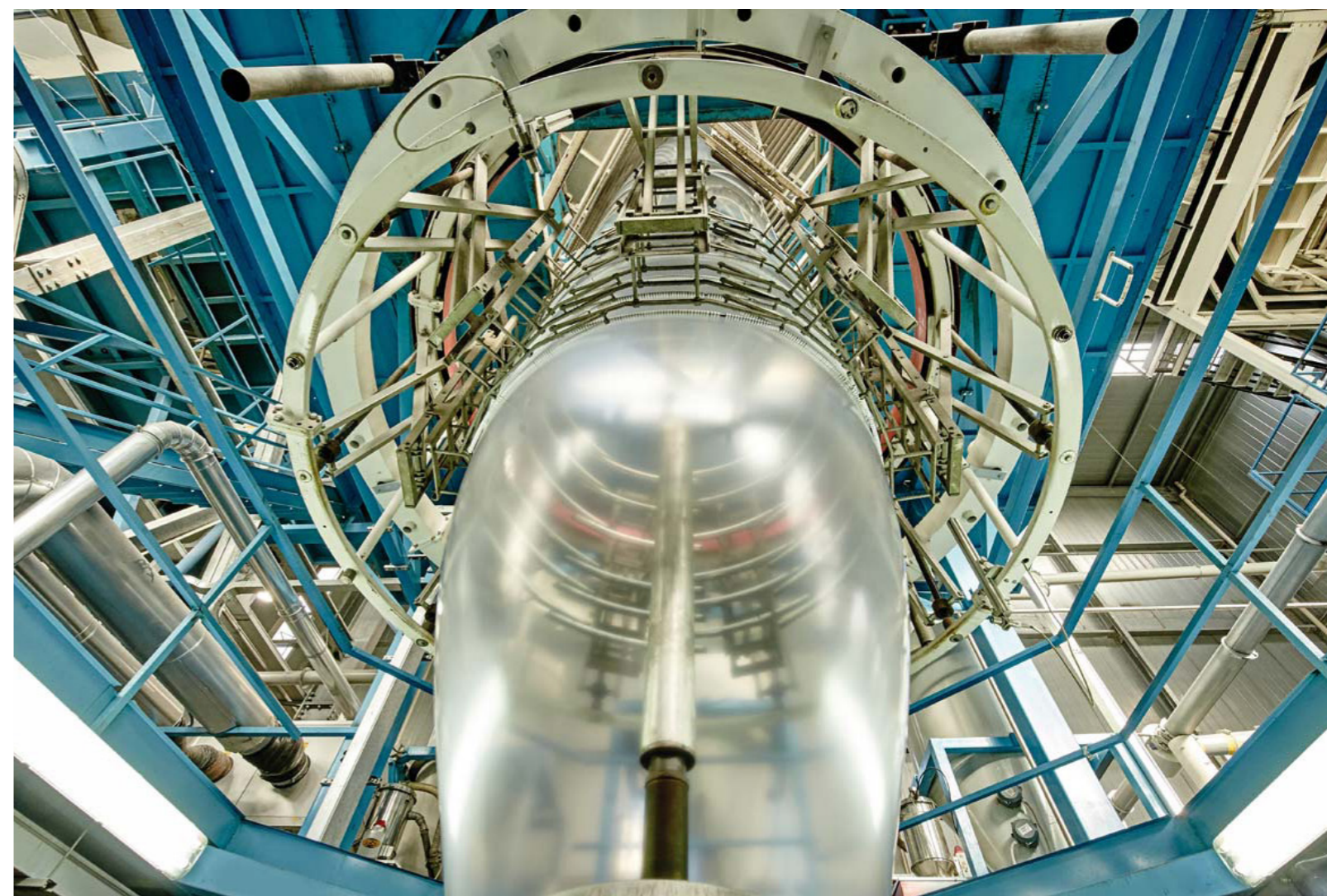
#### Context

Protecting our planet starts with us. Reducing the use of virgin raw materials is an effective way to conserve resources. We promote the circular economy by developing packaging solutions with mechanical post-consumer recycled (mPCR) content.

#### Description

To conserve resources and keep our planet's ecosystem in balance, adapa develops alternative products. We used 60 per cent and 80 per cent mechanically recycled grades of PCR polyethylene (PE) in hygiene draw-string bags.

The project took place in two phases. The first evaluation tests were performed with 60 per cent mechanically recycled grades of post-consumer PE, and after receiving customer approval, the tests continued by shifting to 80 per cent PCR content. All activities from the selection of suppliers to customer approval were managed by Group R&D, the relevant sites, adapa Denmark Bjert, adapa Poland Bogucin and the customer. The project was completed, and 80 per cent mechanically recycled grades of post-consumer PE has been commercialised and is now being regularly produced.



## Materials project ISCC PLUS

### Context

Reducing the product's carbon footprint is a common goal in our industry. To account for associated reductions by incorporating circular, bio-based and renewable materials, they must be traceable. Certifications like the ISCC PLUS ensure the traceability of input materials throughout the supply chain.

### Description

As circular materials are usually blended into manufacturing processes of non-food packaging, they lose their traceability in the supply chain. By implementing a chain of custody, ISCC PLUS seamlessly shows the origin of raw material feedstock from renewable resources and recycling. To achieve full transparency, all participants along the value chain must be certified.

Attaining this certification allows us to use certified circular polymers like chemically recycled post-consumer waste in our products. It enables our

customers with contact-sensitive applications that they can use our packaging without legislative restrictions. The principles underlying the mass balance approach can help us to further reduce our product's carbon footprint.

Regarding the taxation of carbon dioxide emissions, this certification may serve as an accelerator for decarbonisation of the supply chain. It helps participants to reach their GHG reduction goals and recycled content targets.

The following sites of our company are ISCC PLUS certified:

- adapa Denmark Bjert,
- adapa France Averdoingt,
- adapa France Fontenay le Comte,
- adapa France La Ferté Bernard,
- adapa Greece Komotini,
- adapa Italy Florence,
- adapa Poland Bogucin,
- adapa Sweden Landskrona,
- adapa the Netherlands Leek,
- adapa UK St Helens.

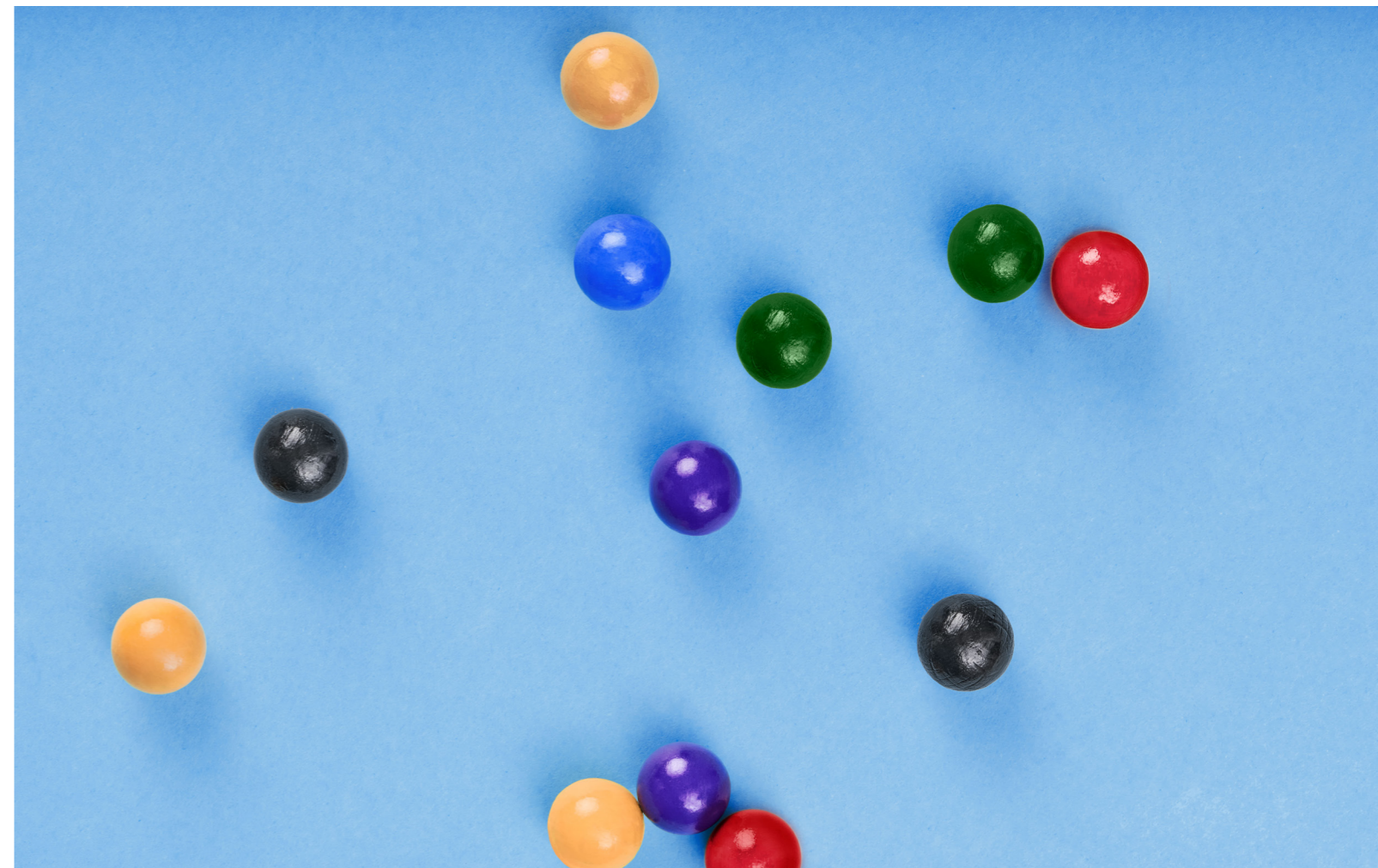
## Materials project Stakeholder involvement

### Context

The European recycling targets, embedded in the Green Deal, mandate that 55 per cent of plastic packaging waste be recyclable by 2030. This target is also a goal for the plastic packaging value chain. CEFLEX is an initiative to enable the circular economy for flexible packaging by considering requirements across the entire value chain. The aim is to achieve circularity for all flexible packaging in Europe by 2025. CEFLEX's D4ACE guidelines help manufacturers, retailers and brands to design flexible packaging to be suitable for sorting and recycling.

### Description

As a member of CEFLEX, we recognise our responsibility to work on a sustainable packaging future in alignment with the value chain. We are involved in several CEFLEX working groups and task force groups to elaborate relevant topics to foster a robust circular economy. We use CEFLEX's D4ACE guidelines as a reference in our development processes to ensure our new flexible packaging products will meet sorting and recycling requirements at the end of their life cycle. We continuously adapt our products design to realign our product portfolio to meet latest design principles. To ensure our products fulfil future requirements, we train our colleagues working in product development and sales on a regular basis.



## Materials project

# Flex4Loop

### Context

High-quality recycling is essential to keep flexible packaging in the loop. adapa joined the Flex4Loop project to support the Austrian Research and Testing Institute (Österreichisches Forschungs- und Prüfinstitut, OFI) in its efforts to optimise high-quality recycling of PE and PP flexible packaging from the lightweight fraction collection. By taking part in this project, we seek to contribute to a circular future.

### Description

Flex4Loop is a three-year project focusing on the sorting and recycling evaluation tests for specific packaging formats that have been identified in the market. Under the leadership of Upper Austria and OFI, stakeholders in the plastics value chain defined alternative packaging types designed for recycling and provide the same functionalities.

The alternative packaging concepts are tested and analysed in a recyclability evaluation process. The results of the sorting and recycling lab tests should be used to update the design guidelines for flexible packaging. adapa has provided samples and data for different packaging materials such as flexible laminates, skin films and polypropylene (PP) thermoforming films, and novel barrier materials for recycling evaluation tests.

The project started in 2022 and will be wrapped up in 2024.



# social people



Our people are our most valuable asset. The pillar "Social" is therefore fully dedicated to our employees. Thanks to their knowledge and experience, we can deliver the highest level of performance and quality.

The wide-ranging backgrounds of the Group companies have allowed us to make diversity our greatest strength.

It is our responsibility that every person who works at adapa feels comfortable, part of the Group and can evolve both on a personal and a professional level.

Together as a team, we strive for a sustainable future.

## Material topics

- Diversity and equal opportunities
- Training and education
- Occupational health and safety
- Consumer health and safety

# Topic: Diversity and equal opportunities

## Overall objective

We want to work together in an environment that promotes diversity, equality and inclusion. Everyone at adapa has the same opportunities.

## Boundaries

This material topic covers every person working for adapa.

## Management approach

Acceptance, respect and equality are the foundation for the way we work together as a Group. Our working environment gives everyone the opportunity to contribute their individuality, ideas and knowledge. It is of the utmost importance to us that everyone is treated equally, regardless of their gender, sexual identity, race, social background, religion, ethnic origin, belief, disability or age. The underlying ethical principles and values embraced by our people in daily business are anchored in our Code of Conduct and human rights policy. To ensure that everyone knows, understands and implements

this set of standards, we perform regular training focused on these areas.

Furthermore, we support the career development of women. Our goal is to increase the share of women in our Group leadership positions. In our job application process, we especially encourage female applicants. Regarding diversity and inclusion, we offer training for our employees.

## Due diligence

Diversity, equality and inclusion are our core values. We promote more active management. To mitigate our impact, we gave our employees the opportunity to gain basic knowledge about diversity and social behaviour via our e-learning platform. We implemented an onboarding process, providing guidelines on important steps to be taken during our employee's first year on the job. Regarding the gender pay gap, we strive to make the accompanying data available and aim to collect this data in 2024.

## Projects

1. Diversity and inclusion training
2. Onboarding process

### SDGs



### UNGC



## KPIs

				2023		2022		
Employees	Total	#		2,052		2,209		
				Female	Male	Female	Male	
				435	1,617	429	1,780	
		%		21.2	78.8	19.4	80.6	
Employees categories	Senior executives (incl. Management Board)	Up to 30 years	#	1	3	0	0	
		30 to 50 years	#	19	57	5	11	
		Over 50 years	#	8	41	0	8	
		Total	#	28	101	5	19	
			%		1.4	4.9	0.2	0.9
	Administrative employees	Up to 30 years	#	46	39	21	31	
		From 30 to 50 years	#	172	165	111	110	
		Over 50 years	#	77	138	69	101	
		Total	#	295	342	201	242	
			%		14.4	16.7	9.1	11.0
	Production employees	Up to 30 years	#	13	170	37	253	
		From 30 to 50 years	#	48	600	114	752	
		Over 50 years	#	51	404	72	514	
		Total	#	112	1,174	223	1,519	
			%		5.5	57.2	10.1	68.8
Parental leave	Total	#		11	9	6	2	
Employees with specific work places	Total	#		7	65	5	20	
Employment contracts	Temporary	%		2.0	3.4	1.1	4.3	
	Permanent	%		19.2	75.4	18.3	76.3	
	Part-time	%		2.7	1.1	3.1	2.4	
	Full-time	%		18.5	77.7	16.3	78.2	

In 2022, only Group functions were assigned to the category 'senior executives', including our Management Board (CEO, CSO, CFO) and B-1 leaders reporting directly to them. In 2023, the category 'senior executives' includes our Management Board (CEO, CSO, CFO), B-1, B-2 leaders and the local managing directors of each department.

## Diversity and equal opportunities project

# Diversity and inclusion training

### Context

As a company, we are committed to strengthening an open and participatory culture in which all employees can contribute fully to the realisation of our strategy. Our day-to-day work at the company is shaped by our core values: trust, continuous improvement, sustainability, team spirit, accountability, reliability and adaptability. Creating a fair and safe working environment for employees is a central responsibility of any company. This is not only a token of respect, but also has a positive impact on a company's future viability in a dynamic and volatile environment. Our diversity and inclusion training promotes a diverse and inclusive workplace.

### Description

In our everyday working lives, a professional approach in one's interactions with diverse colleagues and customers creates an especially respectful work environment.

Many typical conflicts do not happen in the first place. Moreover, companies benefit from a diverse workforce due to the multitude of perspectives and ideas and more successful approaches they bring to the table.

In the diversity and inclusion training, available on our e-learning management platform, employees gain basic knowledge about the most important categories of diversity in our society and about our social behaviour. Through targeted self-reflection and by questioning their values and privileges, employees can take on more responsibility concerning their own approach to diversity. They understand that it's worth letting go of old norms. And they know how to improve their own diversity skills. A diverse and inclusive environment creates a sense of belonging among employees, making them feel more connected and productive.

## Diversity and equal opportunities project

# Onboarding process

### Context

We regard our employees as the basis of our success and a key factor in our efforts to realise our strategy and vision. Our solutions are made by people, for people. Employees who feel appreciated and trusted are more creative and innovative. We believe that appreciation and trust are created by a good onboarding experience that shows employees that their workplace will be supportive and encourages professional development. Our onboarding process gives clear guidelines about important steps to be taken during the first year of employment.

### Description

With our onboarding process and the adapa onboarding Academy we seek to reduce stress and anxiety, help the new hires feel more at ease in their new role and with new co-workers and create an environment of trust.

The onboarding Academy contains different modules where our heads of Group functions introduce their teams, the roles and responsibilities in the team and how their contribution to our company strategy looks like. It gives new hires clear points of contact from whom they can receive key information and coaching and can improve their engagement by 20 to 40 per cent.

Every new joiner in the adapa Group is entitled and asked to be part of our onboarding community. The goal is that every new employee at every level will get proper onboarding training with all the information they need to acclimate to their new work environment and our company culture. With this process we want to help all our new employees to become familiar with the values, goals and expectations we have.



# Topic: Training and education

## Overall objective

We want to empower our people with attractive professional development offerings and internal growth opportunities.

## Boundaries

This material topic covers all employees working at adapa.

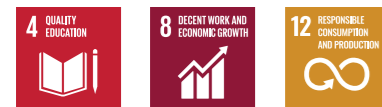
## Management approach

To support and nurture development, we offer our employees training programmes that cater to their individual needs. As education and training needs vary greatly between our Group companies, they are primarily defined on a decentralised level. Supervisors and the local on-site management guarantee access to educational programmes and trainings according to individual requirements. To further foster each employee's access to individual educational programmes and training opportunities at the Group level, we created a learning platform called adapa Academy. By 2025 the platform will offer each employee 24 hours of training per year. Supporting professional and personal development, we will increase internal recruiting rates to leadership positions and offer management training to all our Group leadership team. Furthermore, our internal job platform, which was established in 2022, will be reworked in 2024, supporting a culture of development and enhancing the skills and knowledge of our employees.

## Due diligence

Environmental, Social and Governance (ESG) is a complex topic, and it is hard for employees to keep an overview of updates. To mitigate this negative impact, the internet is used as a platform to disseminate information, while with adapa Academy we aim to train our employees on sustainability, health and safety, governance or personal education topics as well. Further sustainability trainings are planned for 2024. To remediate our impact, an employee training plan needs to be developed and awareness raised by top management. As the structure and organisation in the Group is diverse and decentralised, training and education has become more centrally organised in recent years. The consistency of regular training and education needs to be improved and requires strong backing from management. To mitigate this impact, more centralised and harmonised trainings are organised, with adapa Academy being used as a Group-wide tool. If further training is requested by an employee, it can be offered after prior review, especially if the costs of the measure involved are high. Due to the lack of easy access for young people at organisations and because there is no proactive strategy for seeking out more established staff on the marketplace, there is a risk of a shortage of skilled workers. By actively investing in education and offering more apprenticeships and student jobs, this risk can be mitigated.

## SDGs



## UNGC



## KPIs

			2023		2022	
			Female	Male	Female	Male
Senior executives (incl. Management Board)	Health & safety training	h	7	3	1	1
	Vocational training	h	3	3	2	2
	Regular performance and career development review	%	79	69	60	79
Administrative employees	Health & safety training	h	4	3	1	2
	Vocational training	h	7	5	9	4
	Regular performance and career development review	%	64	62	42	31
Production employees	Health & safety training	h	15	7	3	6
	Vocational training	h	2	10	5	3
	Regular performance and career development review	%	67	64	49	45

## Projects

1. adapa Academy
2. e-learning authoring/creation tool
3. Fire safety e-learning course
4. Internal job platform
5. Performance management process

## Training and education project adapa Academy

### Context

We believe that curious and talented people never stop learning. We want to discover and unleash our employees' talents, empower them with training and development opportunities and cultivate a constructive feedback culture. With our revamped adapa Academy we are bringing a culture of feedback and continuous development to life.

### Description

The adapa Academy, one of the lighthouse projects of our social sustainability targets, is a learning movement based on a strong mission linked to our business plans. It's a framework that will transform the learning environment and support our employees and our operations with a systematic

and data-centric approach. By offering lots of challenging opportunities for professional and personal growth, we foster the development of an attractive working environment.

Our academy is a live tool, designed to inspire our employees and promote self-learning and curiosity. According to the business and learning needs of our people, it will be updated throughout the year and by 2025, it will offer each employee 24 hours of training per year. We want to develop our leaders and our core competencies with a focus on our values, preparing each of us to meet the market requirements of today and tomorrow.

## Training and education project e-Learning authoring/creation tool

### Context

Continuous learning is an ongoing process that expands employee skills and generates new ideas and perspectives. Supporting this continual process of learning, we purchased an authoring tool to create our own e-learning courses based on our company and our organisational needs.

### Description

With our e-learning authoring/creation tool, we align employee learning, training and development with our business priorities. We are not only focusing on mandatory courses to fulfil the legal requirements,

but we are also trying to identify our needs and development activities, together with each and every employee. By providing opportunities for continuous learning, we develop a workforce that is engaged, adaptable and resilient enough to face future changes. We build knowledge and promote mental flexibility.





## Training and education project Fire safety e-learning course

### Context

The safety and well-being of our employees is our highest priority, and we will take all necessary measures to prevent incidents from happening. Dealing with emergency situations and acting in a way that reduces danger and risk can save lives. The fire safety e-learning course improves safety and preparedness in our workplace.

### Description

The e-learning course provides employees with the knowledge to respond confidently and safely in the event of a fire by following the proper procedures. It teaches them about the different types of fire

and what the right fire extinguisher is for each type of fire. It is aimed at all employees, but especially those who work or spend time in a plant. Creating a proactive and safe workplace, we mitigate the risks and promote awareness. The course is available in English, German, French, Italian, Polish and Dutch, with Slovakian, Greek, Swedish, Danish and Finnish soon to follow.

## Training and education project Internal job platform

### Context

By fostering a culture where individuals are empowered to excel in their professions, we create mutually enriching work relationships. With the Evolve! initiative – our internal job platform – we aim to offer our people development perspectives and thus retain our talents at our company.

### Description

Our internal job platform, which was established in 2022, aims to provide growth opportunities and to give our experienced and ambitious employees the option of taking on new challenges. We want

them to be the first to get notified about in-house job opportunities that may spark their interest. The internal job platform will be revamped in 2024, supporting a culture of development and enhancing the skills and knowledge of our employees.





## Training and education project

# Performance management process

### Context

Our company's success depends to a large extent on a committed and motivated workforce. It is a leadership responsibility to support employees and to help them perform to the best of their abilities every day as well as develop and make full use of their potential. Performance management is therefore one of the key components of leadership work at adapa.

### Description

It is important to have direct and ongoing contact with each individual member of the team and to give specific, authentic and regular feedback.

Ongoing professional performance tracking of each team member is necessary, so that our people leaders are able to give employees precise feedback on their performance, to ensure that the

targets defined at the beginning of the year are actually achieved and to create a positive working atmosphere in which the employees are not only highly productive but also satisfied and feel confident and content in the long term.

adapa expects each leader to conduct at least two formal performance appraisal interviews with each team member every year. These interviews are primarily geared towards the future and strengths; it is not used to discuss day-to-day issues at work. Having professionals with outstanding knowledge and skills is the key to achieving our future goals. By continuously assessing strengths and weaknesses in a clear and honest way, we are able to identify individual potential for future development. We strive to create an environment where employees can improve their performance and skills.



# Topic: Occupational health and safety

### Overall objective

Our aim is to consolidate our Group efforts to promote health and safety to ensure zero accidents and increase employee well-being.

### Boundaries

This material topic covers everyone working at adapa.

### Management approach

In every site, local occupational health and safety (OH&S) teams work together with our employees to make sure everyone goes home safe and healthy each day after work. As a Group of companies, we learn from each other and drive our individual OH&S performance together. A Group-wide procedure including incident notification, reporting and a hazard identification process, are in place. Examples of incidents that occurred are published on our website to prevent similar ones from happening in the future. It is essential that each and every employee is aware of health and safety risks in their daily work and act responsibly to prevent incidents and accidents at work.

Our toolbox talks foster communication and enables employees to exchange vital information, seek clarification and address any concerns related to safety. To ensure continuous health and safety awareness, all employees receive regular training, and everyone learns about unsafe situations and/or conditions that occur in our day-to-day operations, as well as safety rules and a variety of other safety-related topics.

### Due diligence

When employees are absent from work due to illness or injury, this has a major impact on our organisation's processes and creates added stress for the rest of the workforce. To mitigate the risk of an increased rate of illness due to insufficient health and safety management, a number of projects and specialised training programmes on workplace safety are carried out. By supporting sick and injured employees, analysing the root cause of each incident and taking preventive and corrective measures, we can remediate our impact.

	2023	2022
Lost time injury (LTI) rate	1.37	6.8
Injury-related absence time	# 403	379

A lost time injury is an injury sustained during an activity within the given reporting boundaries by a member of the adapa workforce that will result in a loss of productive work time for more than one working day. The LTI rate is calculated as follows: (Number of lost time injuries in the reporting period x 1,000,000) / (total hours worked in the reporting period). The injury-related absence time is counted as days absent from work caused by a people accident.

### Projects

1. OH&S management system
2. Enforcement policy
3. Knife update
4. Near miss unsafe act and condition app
5. Toolbox talks

SDGs



UNGC



# Occupational health and safety project OH&S management system

## Context

By prioritising occupational health and safety (OH&S), we demonstrate our commitment to employee well-being and engagement while fostering a culture of responsibility and sustainability. Our OH&S management system enhances workplace safety and ensures compliance with health and safety regulations.

## Description

Our OH&S management system consolidates our efforts to create an environment where employees feel valued, safe and responsible. Its design includes risk assessment tools, safety protocols, training programmes and incident reporting procedures.

Systematic hazard identification, implementation of safety protocols and employee training programmes help prevent accidents and injuries in the workplace, minimise risks and promote safety.

We continuously monitor OH&S performance metrics and indicators to track progress and identify areas for improvement. Evaluating the effectiveness of the OH&S management system through regular audits, inspections and feedback mechanisms, we create a dynamic and responsive safety culture within the organisation.



# Occupational health and safety project Enforcement policy

## Context

Ensuring uniform enforcement policies is crucial for maintaining high safety standards and protecting our employees and assets. The enforcement policy project refers to a set of initiatives, guidelines and actions designed to ensure compliance with laws, regulations and internal policies. It includes measures to enforce ethical behaviour, environmental regulations, social standards and governance principles.

## Description

Despite existing safety protocols and procedures, there is an inconsistency in enforcement policies across adapa Group plants in Europe. This inconsistency leads to different safety standards, increased risk of incidents and potential legal and financial consequences.

adapa Group has developed a standard enforcement policy and shared it with all European sites.

In cases where local laws and regulations prevent the direct implementation of this policy, each relevant site had to adapt the policy to ensure compliance with local requirements. The sites provided training to first-line managers and supervisors to ensure the effective application of the enforcement policy. The policy was then introduced to all employees, and its implementation start date was established. By the beginning of 2024, all reported 'Lost Time Injuries' and 'Medical Treatment' cases are followed up by the Group and the local sites, where it is also discussed whether the employee and their immediate supervisor should receive a written warning.

By ensuring compliance, increasing transparency, mitigating risks, promoting ethical behaviour, fostering continuous improvement and building stakeholder trust, we support and advance our sustainability goals and commitments.

## Occupational health and safety project Knife update

### Context

A key part of creating a safe and healthy work environment is commitment and awareness. By prioritising the replacement of handheld knives with safer alternatives, we underscore our commitment not only to improving workplace safety but also highlight our dedication to maintaining a safe, efficient and responsible workplace.

### Description

This knife update is a safety improvement initiative to boost workplace safety by systematically replacing handheld knives used in various activities. To implement and deploy the new cutting tools and protocols across all sites, a thorough evaluation

of current knife usage was conducted, and safer alternatives were identified and chosen. Comprehensive employee training was provided on the safe use of new cutting tools and techniques while monitoring was conducted to evaluate the effectiveness of the new tools and protocols. To ensure zero accidents and increase employee well-being our next step is to introduce a Group-wide mandatory working method with safe tools for applying splices in film reels.



## Occupational health and safety project Near miss unsafe act and Condition

### Context

To build a strong and safety culture, clear and open communication is essential. The near miss unsafe act and condition app project aims to create a proactive safety culture within the organisations by encouraging employee participation in identifying and mitigating potential hazards before they result in accidents or injuries.

### Description

The near miss unsafe act and condition app project is designed to enhance workplace safety by empowering employees to report and address potential hazards, near misses, unsafe acts and unsafe conditions in real time. The project involves the development and implementation of a mobile application that allows employees to easily document and report any unsafe incidents or conditions they encounter during their work activities.

The mobile application was created to facilitate the reporting of near misses, unsafe acts and conditions and a follow-up tool to track reported incidents and monitor corrective actions taken. Training videos explained the app's functionality and the responsibilities for user adoption and integration into daily operations. By promoting a proactive safety culture, we develop a culture of trust, respect and responsibility.



## Occupational health and safety project

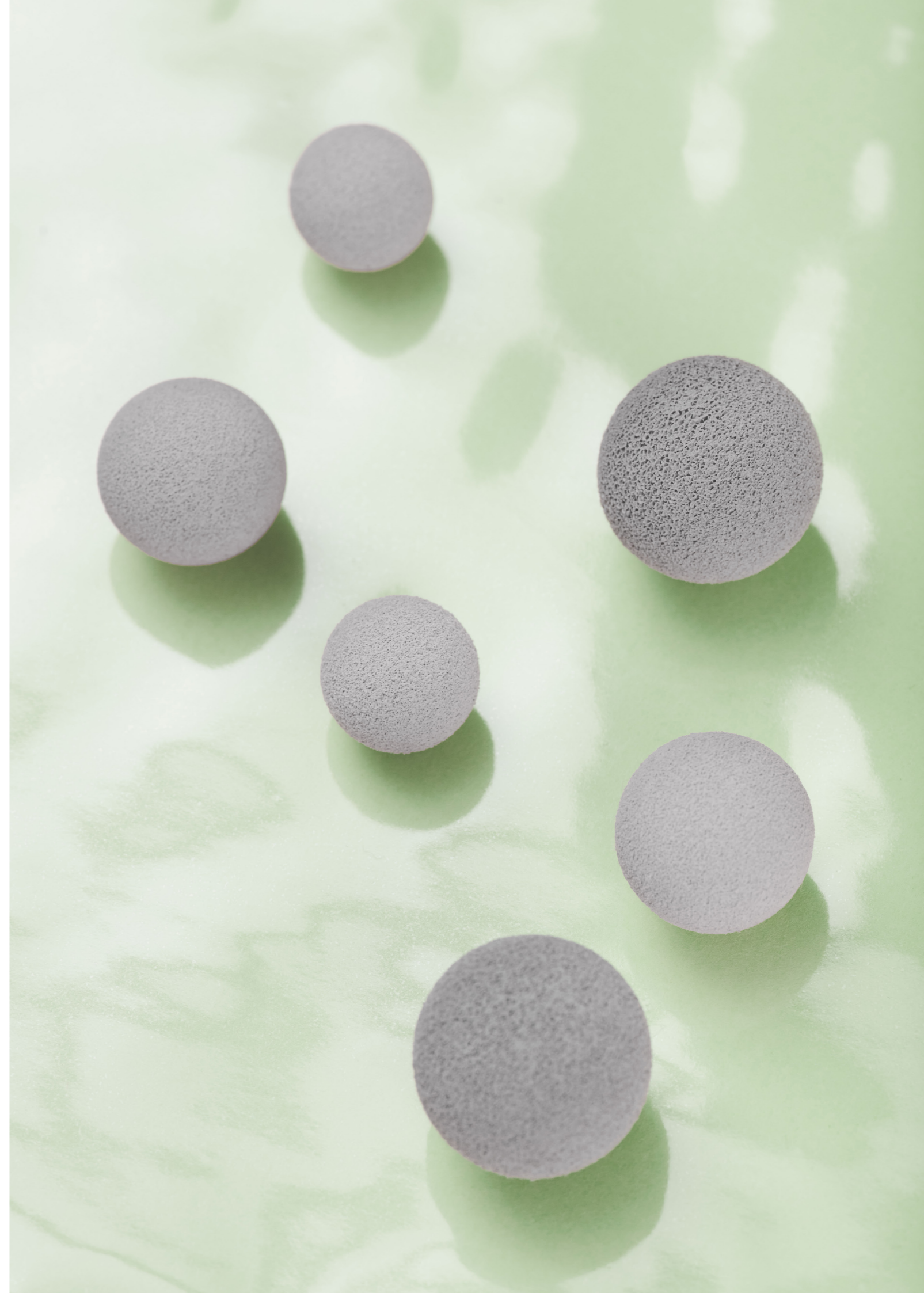
# Toolbox talks

### Context

Effective communication is an important aspect of a safety workplace. By fostering clear and open lines of communication employees are aware of potential workplace hazards and risks, allowing them to make an active effort to avoid them. The toolbox talks project helps by encouraging a safer, more engaged and continuously improving working environment. It enables employees to exchange vital information, seek clarification and address any concerns related to safety.

### Description

The toolbox talks project aims to improve workplace safety and communication by holding regular short safety meetings in the workplace. These talks are designed to cover specific safety topics, such as safe knife handling, safety belts on forklifts, chemical-resistant gloves and eye and face protection. They reinforce safety protocols and engage employees in open discussions on safety issues relevant to their daily tasks. The project is structured to ensure systematic implementation and active participation of all employees. In a workplace setting, communication serves as the foundation for a safe and productive environment. Effective communication not only ensures that everyone is on the same page regarding safety protocols but also fosters a culture of trust and openness.



# Topic: Consumer health and safety

### Overall objective

Our high hygiene and production standards continue to ensure reliable product safety that upholds consumer health and safety.

### Boundaries

This material topic focuses on all our products.

### Management approach

To ensure a high level of protection of consumer health, our packaging materials comply with the relevant legislation and are produced according to the rules of good manufacturing practice.

As the knowledge about interactions between chemicals and environment, or human beings, is increasing, new regulations and updates are issued and must be met. For our business and product development it is essential to be aware of the upcoming legislation. To transfer and share knowledge between the different entities, biannual meetings with all responsible employees take place and internal newsletter with all the key insights are sent out.

## KPIS

		2023
Incidents of non-compliance with regulations resulting in a fine or penalty	#	0
Incidents of non-compliance with regulations resulting in a warning	#	0
Major BRC non-conformities in regulatory affairs	#	0

### SDGs



### UNGC



## Projects

1. One-on-one meeting

# Consumer health and safety project One-on-one meeting

### Context

Efforts to increase the knowledge of the people involved in regulatory affairs, awareness of new regulations and following surveillance plans uphold consumer health and safety.

### Description

The project was launched at the beginning of 2023. We identified that the biannual meetings with all the employees involved in regulatory affairs was insufficient. The main goal is to meet at regular intervals with the relevant employees at the various entities.

The one-on-one meetings enable us to assess the level of knowledge they have on regulatory affairs, provide training in areas where they are less strong and inform them about new regulations. We also create surveillance plans, tackle customer questions and requests that appear and reach consensus on the way to tackle problems. A surveillance plan on the specific topic of primary aromatic amines has currently been adopted. Our next step will involve metals in relation to Annex II of Regulation 10/2011 and other chemical substances.



# governance prosperity

We want our work to be key in creating ecosystems rich with opportunity. These shall add value in two ways: supporting our stakeholders – enabling them to live prosperous and fulfilling lives – and achieving economic, social, and technological progress in harmony with nature and its limits.

Governance serves as a framework that helps us steer every business activity and decision, allowing us to get closer and closer to reaching our overall objective of minimising our negative impacts and maximising our positive ones. Innovation and transparency are the fundamental drivers to achieving this vision.

## Material topics

- Governance
- Economic performance
- Supplier assessment



# Topic: Governance

## Overall objective

Being a responsible corporate citizen, we strive to uphold the highest standards of professional and ethical business conduct in everything we do.

## Boundaries

Governance covers four of our material topics: non-discrimination, anti-corruption, collective bargaining agreements and customer privacy.

## Management approach

Compliance with applicable laws, regulations as well as ethical standards is key and at the heart of our Group's operations and business practices. Ensuring our responsibility, we incorporate the Ten Principles of the UN Global Compact (UNGC) into our

organisation. Our business ethics are defined by our Code of Conduct, setting the rules, principles, values and behaviours that all employees need to follow. To promote awareness among each and every employee a mandatory online training is conducted. Due to the recent enforcement of EU regulations, we updated our whistleblower system, promoting transparency and accountability. The protection of customer, business partner and employee data are our priority. To uphold compliance with the general data protection regulation (GDPR), we engaged an external data protection officer, ensuring data confidentiality and integrity and enhancing trust among customers and partners.

## KPIs

		2023
Incidents of corruption	#	0
Incidents of discrimination	#	0
Employees covered by collective bargaining	%	70
Substantiated complaints concerning breaches of customer privacy and losses of customer data	#	0

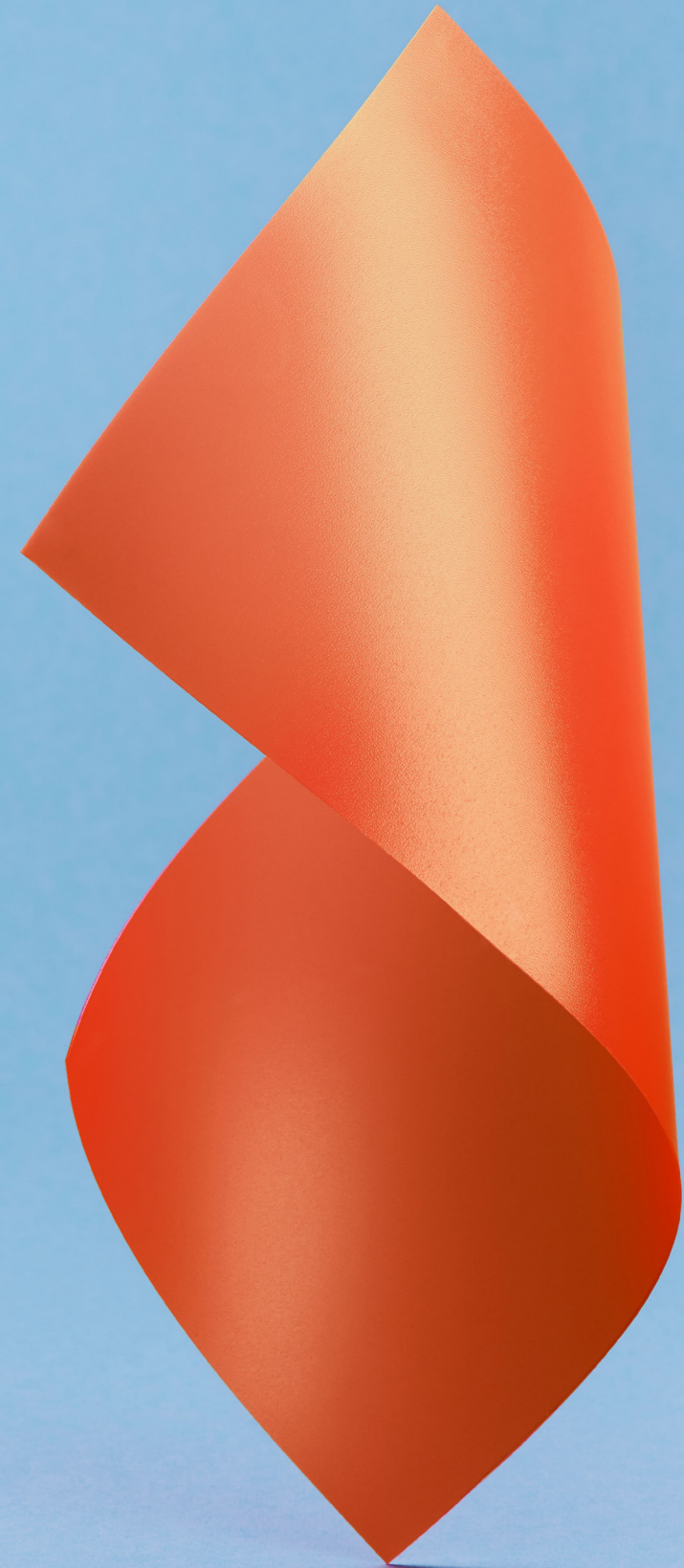
## Projects

1. Group data protection officer
2. New CoC and mandatory online course for every new employee
3. Updates to the whistleblower system
4. Legal compliance database

### SDGs



### UNGC



## Governance project

# Group data protection officer

### Context

To uphold full compliance with the general data protection regulation (GDPR), a strategic decision was made to enlist the services of an external data protection officer. After careful consideration, a consulting firm renowned for its expertise in data protection was chosen for this pivotal role. Collaborating closely with the compliance office of the adapa Group, they are diligently overseeing the safeguarding of customer, business partner and employee data.

### Description

The newly appointed data protection officer has assumed their responsibilities and their appointment has been duly communicated to the relevant data protection authority. This proactive step not only demonstrates a commitment to meeting regulatory requirements but also underscores a proactive approach to ensuring the confidentiality and integrity of sensitive data within the organisation. Through this partnership, the adapa Group aims to enhance data governance practices, mitigate risks and foster trust among stakeholders.



## Governance project

# New CoC and mandatory online course for every new employee

### Context

The rules of conduct are essential for guiding the behaviour of employees, promoting a positive work culture and preventing misconduct and any type of discrimination. Last year a new Code of Conduct was created and published. It ensures that adapa complies with the relevant laws, thereby protecting employees, customers and business partners, avoiding sanctions and penalties and creating a basis of trust.

### Description

The Code of Conduct serves as the basic set of rules for all adapa employees and covers the following topics:

- Fundamental ethical principles (including non-discrimination and equal opportunities)
- Health and safety at work
- Protection of the environment
- Anti-bribery and corruption
- Gifts and invitations
- Donations and sponsoring
- Antitrust and competition law
- Trade control
- Privacy and information security
- Anti-money laundering

To ensure that all employees are aware of the content of the Code of Conduct and comply with the rules set out in it, a mandatory online course must be completed by every new employee. In 2024 we are planning to update the online course and make it a mandatory annual training course for every employee, not just new colleagues. A test will also be included to measure our employees' knowledge. The Group's compliance office, which is responsible for this project, ensures that every employee complies with the rules established in the Code of Conduct as well as relevant laws and regulations.

## Governance project

# Updates to the whistleblower system

### Context

The recent enforcement of EU regulations concerning whistleblower protection has prompted updates to existing systems across various companies. With these updates, previously entities not covered by the system now have implemented whistleblower mechanisms in compliance with national laws.

### Description

The updated whistleblower system now provides all employees with easy access using either their computer or mobile phone. To enhance accessibility and comprehension, the system supports 12 languages, ensuring that every employee

understands how to utilise it effectively. Additionally, information, including a QR code for accessing the system, is routinely displayed on information screens situated at the company's facilities. This proactive approach not only facilitates ease of access but also underscores the commitment to fostering transparency and accountability within the organisation. By embracing these changes, companies are better equipped to address potential misconduct while promoting a culture that values integrity and ethical behaviour among employees.

## Governance project

# Legal compliance database

### Context

By creating a strong compliance culture, we foster integrity and accountability and build trust across our employee and leadership base. The environment health & safety (EH&S) legal compliance database project promotes a culture of compliance and best practices, improves operational efficiency and applies the best techniques available to ensure sustainable and responsible business practices.

### Description

The EH&S legal compliance database project aims to develop a centralised, comprehensive system to help sites ensure compliance with legal and regulatory requirements for permits, environment,

health and safety, and best available techniques across Europe. To build a strong compliance culture adapa is partnering with an external company specialising in legal compliance with extensive local knowledge across European jurisdictions.

The first step was to determine the specific legal requirements for each location. This was fundamental to creating a detailed overview of all applicable legislation and then identifying areas of non-compliance or potential improvement. A culture of compliance lays the foundation for ethical practices and responsible behaviour.



# Topic: Economic performance

## Overall objective

Keeping a balanced ecosystem in mind, we work on clever approaches to make our products and operations more environmentally friendly while securing our profitability.

## Boundaries

All sites are covered under this material topic.

## Management approach

In the spirit of the circular economy, we develop alternative and innovative packaging solutions. Operating in a legislative environment where new regulations are adopted and new requirements must be met, we continuously monitor the respective legislative developments to comply and meet tomorrow's circular economy and market demands. Being active in several advocacy task forces and initiatives, we not only follow the relevant legislation but also incorporate it into our strategies. Our commitment to sustainability drives us to be ahead of the new requirements and better prepared for the future of packaging.

## Due diligence

As a producer of flexible packaging material with global sourcing and sales, we must consider social and environmental issues in every purchasing and sales decision. In this context, we are developing a Group-wide management system for supplier quality assurance (SQA) to achieve traceability and transparency in the entire supply chain. Training is carried out on our Code of Conduct (CoC) and on product sustainability, providing insights not only

on the rules, principles and guidelines on conduct which must be observed by every employee, but also on the guidelines, regulations and requirements for recycling and recyclability that should be met to develop alternative and innovative packaging. The new and upcoming regulations, the restrictions and the increasing packaging requirements create risk and uncertainty. The risks due to new types of fees or taxes related to plastics and the environment or due to penalties associated with the regulations are unclear. We constantly monitor relevant legislation, are aware of regulatory updates and provide input to different regulatory bodies through associations and initiatives.

The increasing packaging requirements may change customer or consumer preferences, leading to the risk of losing market share, whereas, as severe weather events occur more frequently, costs are increased due to potential damage. While we strive to tackle climate change, reduce our energy consumption and achieve the goal of having 100 per cent of our energy from renewable resources, energy prices fluctuate, leading to cost uncertainty. To mitigate this risk, we are focusing on solar energy under PPAs (power purchase agreements) in combination with an agreement on energy balancing.

As Environmental, Social and Governance (ESG) plays a significant role in most companies, the competitive pressure is increasing. To remain a market leader, further engagement and investment is required.

## Projects

1. Monitoring regulatory environment surrounding packaging
2. 'Packaging solutions designed for recycling' tool
3. Paper strategy in confectionary and food packaging
4. Product DNA

SDGs



UNGC



Economic performance project

# Monitoring regulatory environment surrounding packaging

**Context**

Packaging and packaging waste are the subject of different regulatory updates. adapa, as a flexible packaging producer, is therefore operating in a dynamic legislative environment. Over recent years, especially the requirements regarding recycled content, recyclability and reuse are covered under new regulations. To ensure the compliance of our products with all applicable laws and regulations, we continuously monitor the respective legislative developments at a European and country level. This allows us to proactively develop innovative packaging that meets tomorrow's circular economy demands.

**Description**

Flexible packaging should be designed according to specific guidelines to enable recycling. To design products for recycling we can currently choose from many different guidelines which are not harmonised and are subject to constant change. That is a challenge for manufacturers operating and serving markets and customers in multiple countries in Europe and globally. Therefore, we are active in several advocacy task forces and design for recycling working groups to monitor and influence regulatory changes. The knowledge of upcoming guidelines and regulations is important for a robust product portfolio strategy. Customers all across Europe profit from our regulatory monitoring and develop products together with adapa that comply with existing regulations and are designed for recycling in conformity with the guidelines. Our Sustainability team is responsible for this ongoing process. As a member of various associations, adapa participates in discussions with national and international legislative authorities to support the preparation and harmonisation of legally binding definitions and regulations for future packaging.

Economic performance project

# 'Packaging solutions designed for recycling' tool

**Context**

We are strongly committed to propose packaging solutions to foster circular economy, with the 'Packaging solutions designed for recycling' tool serving as an example of our commitment. This multiplatform project with a centralised product database allows us to identify and choose the best solutions for our customer.

**Description**

We developed and implemented a tool to identify the best packaging solution designed for recycling from our portfolio. The tool is easy to use and available as a mobile app and as a browser version. It enables us in the sales and R&D departments

to propose the best packaging solutions to our customers and to scale up standardised products designed for recycling from our portfolio. By asking simple questions users can enter parameters of a packaging application and automatically receive a recommendation for the best and latest packaging material from our designed for recycling 're-portfolio'. A packaging solution involving a PP-based film for thermoforming with a PP lidding film, including information about requested features such as high-barrier, peel or anti-fog, is one example of this. The project started in 2023 and is headed up by our research and development team and product managers. It took six months to get up and running.



Economic performance project

# Paper strategy in confectionary and food packaging

### Context

Paper has long been used in the packaging industry but is becoming increasingly important with the move towards more sustainable products. adapa began by evaluating its current portfolio to identify non-recyclable paper products, subjecting them to a variety of European testing protocols to understand the areas of non-compliance.

### Description

With the rapid harmonisation of the European paper recyclability testing protocols under the guidance of 4EverGreen, Cepi and CPI over the past

two years, adapa was developing and adapting to the new testing requirement. Whilst the newest packing machines are designed to utilise paper, almost all machines currently in operation by our customers are designed for film and film laminates, making them unsuitable to run paper. Therefore, we evaluated the use of paper for flow wrap on horizontal form fill seal (HFFS) and vertical form fill seal (VFFS) machines and developed a range of laminates that are to be tested to ensure recyclability and processability on existing customers packing lines. The launch of our PaperTwister product range demonstrates our robust product portfolio strategy.



Economic performance project

# Product DNA

### Context

Packaging is as diverse as the products which are packed in it. Most of adapa's products are customised to master all kinds of applications, stand out on the market, be appealing to sell products. Future packaging should be designed for recycling and contain recycled materials, without compromising its primary packaging functions. Detailed data of packaging specifications and materials and the exchange of such data help facilitate product conformity reports, rapid adoption in future design for recycling updates and close gaps in circularity.

### Description

We implemented a new product specification database to make the DNA of our products tangible. adapa's product DNA database is the key to identifying detailed specification data of all products produced by adapa. The portfolio can easily be searched by application, market or detailed specifications to identify individual products or product groups. The database is used in order to implement our product strategy or for design for recycling portfolio assessments. Whatever the future might bring, our product DNA database allows us to analyse our portfolio, identify products that need to be adapted and share data using tools or customer platforms in order to carry out conformity assessments.

# Topic: Supplier assessment

## Overall objective

Our aim is to obtain detailed insights into our supply chain to ensure responsible business conduct, protect human rights and reduce impacts on the environment.

## Boundaries

In this material topic, the focus is on raw material suppliers.

## Management approach

Setting up a Group-wide management system for supplier quality assurance (SQA), we ensure traceability across the supply chain. By building a bridge between procurement and quality management, we have implemented the entire system to achieve higher transparency regarding activities from our raw material supplier. We upgraded our supplier environmental and social assessment, which is part of our supplier manual, our Supplier Code of Conduct (SCoC) and our updated supplier audit questionnaire sent out to all relevant raw material suppliers. Our suppliers run through the supplier audit and qualification process. The accompanying documents are available and stored on our Group Library. With our on-site audit programme, we are checking all implemented process and certification at supplier sites. All this information is shared, stored and discussed at our monthly SQA updates meetings.

## KPIS

92 %

of our key raw material suppliers agreed to or signed our Supplier Code of Conduct

## SDGs



## Due diligence

Transparency and traceability throughout the supply chain is of great importance. As our supply chain is long and complex, traceability is limited. To mitigate our impact, we are developing a supplier quality assurance system to ensure traceability in the global supply chain. Remote and online audits are carried out to monitor and check. In the event of non-compliance when corrective actions are requested, we investigate or even look for alternative suppliers.

To evaluate our suppliers, we considered quality, social and environmental factors. For that reason, we are constantly adding new factors and more details to our questionnaires.

Due to the complexity in the supply chain, there is a risk that only limited information on transparency will be available. Through our supplier quality assurance (SQA) and traceability tests, we increase transparency and seize the opportunity to boost profits and gain an edge on our competitors.

## Projects

1. Group-wide supplier quality assurance system

## UNGC



## Supplier assessment project

# Group-wide supplier quality assurance system

## Context

Maintaining and enhancing product quality requires open communication and information sharing. To gain more detailed insights into our supply chain, adapa implemented a Group-wide supplier quality assurance system for key raw material suppliers ensuring responsible business conduct, quality, protecting human rights and reducing our impact on the environment.

## Description

To ensure traceability throughout the supply chain, the Group-wide supplier quality assurance system for key-material suppliers was set up by our new quality organisation. Data for the evaluation and for compliance with quality standards, procedures and documentation was collected step by step. The Group-wide system supports the traceability of our raw materials, ensures that minimum environmental and social standards are met and improves risk management. By building a foundation of cooperation and trust between businesses and suppliers, we promote innovation and continuous improvement.



# Appendix

## Full list of consolidated adapa subsidiaries

as of 3.1.2024

### Austria

- adapa Holding GesmbH, Austria
- adapa Digital GesmbH, Austria

### Denmark

- Adapa Flexibles Denmark Bjert A/S, Denmark
- adapa Flexibles Denmark Slagelse A/S, Denmark

### Finland

- adapa Finland Jakobstad Oy, Finland

### France

- adapa France SAS, France
- adapa France Averdoingt SAS, France
- adapa France Fontenay le Comte SAS, France
- Schur Flexibles Uni Coextrusion, France
- adapa France La Ferte-Bernard SAS, France
- adapa France Logistics SAS, France

### Germany

- adapa GmbH, Germany
- adapa DACH GmbH, Germany
- adapa Germany Kempten GmbH, Germany
- adapa Germany Administration Kempten GmbH, Germany
- adapa Films Kempten GmbH & Co. KG, Germany
- Schur Flexibles Flexofol GmbH, Germany
- adapa Germany Freital GmbH, Germany
- Schur Flexibles Vacufof GmbH, Germany
- PS Polymer Sourcing GmbH, Germany
- Uni Verpackungen GmbH, Germany

### United Kingdom

- adapa UK Edinburgh Ltd, United Kingdom
- adapa UK St Helens Ltd, United Kingdom
- Oui3 Ltd, United Kingdom

### Greece

- adapa Greece, Komotini, Greece
- Prisma Cylinders Engraving SA, Greece

### Ireland

- Schur Flexibles Ireland Ltd., Ireland

### Italy

- adapa Italy Fprli S.p.A., Italy
- adapa Italy Florence S.r.l., Italy

### Netherlands

- adapa the Netherlands Leek B.V., Netherlands
- adapa the Netherlands Rotterdam B.V., Netherlands
- adapa the Netherlands Amersfoort B.V., Netherlands
- adapa the Netherlands Goirle B.V., Netherlands

### Poland

- adapa Poland Bogucin sp.z.o.o., Poland

### Slovakia

- adapa Slovakia Trebisov s.r.o., Slovakia

### Spain

- Dixie Iberia SLU, Spain

### Sweden

- adapa Sweden Landskrona AB, Sweden
- Unipac AB, Sweden

### Russia

- OOO Schur Flexibles Rus, Russia
- Zwart LLC, Russia

## Group companies included in the reporting boundaries

as of 3.1.2024

### Administrative sites

- adapa Holding GesmbH,, Austria
- adapa GmbH, Germany
- adapa DACH GmbH, Germany
- adapa France SAS, France
- adapa UK Edinburgh Ltd, United Kingdom

### Production sites

- adapa Germany Freital GmbH, Germany
- adapa Germany Kempten GmbH, Germany
- Adapa Flexibles Denmark Bjert A/S, Denmark
- adapa Flexibles Denmark Slagelse A/S, Denmark
- adapa Finland Jakobstad Oy, Finland
- adapa France Averdoingt SAS, France
- adapa France La Ferte-Bernard SAS, France
- adapa France Fontenay le Comte SAS, France
- adapa UK St Helens Ltd, United Kingdom
- adapa Greece, Komotini, Greece
- Prisma Cylinders Engraving SA, Greece
- adapa Italy Fprli S.p.A., Italy
- adapa Italy Florence S.r.l., Italy
- adapa the Netherlands Leek B.V., Netherlands
- adapa the Netherlands Rotterdam B.V., Netherlands
- adapa the Netherlands Amersfoort B.V., Netherlands
- adapa the Netherlands Goirle B.V., Netherlands
- adapa Poland Bogucin sp.z.o.o., Poland
- adapa Sweden Landskrona AB, Sweden
- adapa Slovakia Trebisov s.r.o., Slovakia

## List of countries in which adapa has clients

Albania, Algeria, Argentina, Australia, Austria, Belgium, Brazil, Bulgaria, Canada, Chile, Chine, Costa Rica, Croatia, Cyprus, Czech Republic, Denmark, Dominican Republic, Egypt, Estonia, Fiji, Finland, France, Germany, Greece, Guatemala, Hungary, Iceland, India, Indonesia, Ireland, Israel, Italy, Japan, Jordan, Kazakhstan, Kuwait, Latvia, Lithuania, Luxembourg, Malaysia, Malta, Mexico, Morocco, Netherlands, New Zealand, Nicaragua, Norway, Oman, Paraguay, Poland, Portugal, Qatar, Republic of North Macedonia, Romania, Russian Federation, Samoa, San Marino, Saudi Arabia, Serbia, Slovakia, Slovenia, Solomon Islands, South Africa, South Korea, Spain, Sweden, Thailand, Tunisia, Turkey, Ukraine, United Arab Emirates, United Kingdom, United States, Venezuela, Viet Nam.

## Material Topics

Material topic	Explanation
<b>Emissions</b>	Calculation of corporate greenhouse gas emissions and efforts to reduce emissions. All emissions emitted in the atmosphere and efforts towards their recovery and reduction.
<b>Energy</b>	Reduction of energy consumption and improvement of energy efficiency by means of an internal energy management system. Investments in renewable energy supply and generation of own electricity.
<b>Waste</b>	Prevention of waste and reduction of its volume. Innovative solutions for waste treatment (separation, reuse).
<b>Materials</b>	Increase the recycled content in our products and develop sustainable packaging solutions to minimise the amount of fossil-based virgin raw materials used and conserve resources.
<b>Diversity and equal opportunities</b>	Equal rights, opportunities and payment for women and men. Embracing diversity of employees and fighting discrimination and violence. Offering special workplaces. Respecting people regardless of age, gender, education, ethnic origin, religion and sexual orientation.
<b>Training and education</b>	Facilitation and financing of professional and personal development (external training, postgraduate studies, additional courses, etc.) and internal training.
<b>Occupational health and safety</b>	Ensure occupational health and safety for all employees (training, protective measures, protective clothing, etc.).
<b>Consumer health and safety</b>	Ensure consumer health and safety and maintain our high hygiene and production standards.
<b>Governance</b>	Principles of corporate governance: regulatory framework for the management and supervision of the company and ethical value set (transparency, accountability, reliability). Managing ESG risks proactively.
<b>Economic performance</b>	In the light of the circular economy working on alternative and innovative packaging solutions, while ensuring our profitability.
<b>Supplier assessment</b>	Increasing traceability and transparency throughout the entire supply chain to ensure responsible business conduct, protect human rights and reduce impacts on the environment.





## Abbreviations

Abbreviation	Meaning
<b>Alufoil</b>	Aluminium foil
<b>BOPP</b>	Biaxially oriented polypropylene
<b>CEFLEX</b>	Circular Economy for Flexible Packaging
<b>Cepi</b>	Confederation of European Paper Industries
<b>COC</b>	Code of Conduct
<b>CO<sub>2</sub>E</b>	Carbon dioxide equivalents
<b>COP</b>	Communication on Progress
<b>CPCR</b>	Chemical post-consumer recycled
<b>D4ACE</b>	Design for a Circular Economy (CEFLEX's guidelines)
<b>EH&amp;S</b>	Environment, health and safety
<b>ESG</b>	Environmental, Social and Governance
<b>ESRS</b>	European Sustainability Reporting Standards
<b>FPE</b>	Flexible Packaging Europe
<b>FSC</b>	Forest Stewardship Council
<b>GDPR</b>	General Data Protection Regulation
<b>GRI</b>	Global Reporting Initiative
<b>HFFS</b>	Horizontal form fill seal
<b>ISCC PLUS</b>	International Sustainability & Carbon Certification
<b>KPI</b>	Key performance indicator
<b>MPCR</b>	Mechanical post-consumer recycled
<b>OCS</b>	Operation Clean Sweep
<b>OFI</b>	Österreichisches Forschungs-und Prüfinstitut (Austrian Research and Testing Institute)
<b>OH&amp;S</b>	Occupational health & safety
<b>PCR</b>	Post-consumer recycled
<b>PE</b>	Polyethylene

Abbreviation	Meaning
<b>PEF</b>	Product environmental footprint
<b>PP</b>	Polypropylene
<b>PPAS</b>	Power purchase agreements
<b>R&amp;D</b>	Research and development
<b>RTO</b>	Regenerative thermal oxidiser
<b>SCOC</b>	Supplier Code of Conduct
<b>SDGS</b>	Sustainable development goals
<b>SQA</b>	Supplier quality assurance
<b>UNGC</b>	United Nations Global Compact
<b>VFFS</b>	Vertical form fill seal
<b>VOC</b>	Volatile organic compounds

## Glossary

Term	Definition
<b>4PS</b>	The 4Ps are: Purpose, People, Planet and Prosperity. These four dimensions shape the strategic future of adapa.
<b>5R</b>	The 5R are: Responsibility, Reduction, Renewal, Replacement and Recycling.
<b>Global Reporting Initiative</b>	The Global Reporting Initiative is an international guideline for sustainability reporting that aims at reporting on sustainability impacts in a consistent and credible way.
<b>Greenhouse gas emissions</b>	Greenhouse gas emissions are the sum of emissions of various gases (carbon dioxide, methane, nitrogen oxide and smaller trace gases) that are by-products of the industrial processes of business operations. The increased production of greenhouse gas emissions is the main driver of global climate change.
<b>Injury-related absence time</b>	The injury-related absence time is counted as days absent from work caused by a people accident.
<b>Key raw materials</b>	Key raw materials are all supplies of film, alufoil, paper, adhesive, ink, solvent and granules.
<b>LTI (Lost time injury)</b>	A lost time injury is an injury of a member of adapa's workforce sustained during an activity within the given reporting boundaries that will result in a loss of productive work time for more than one working day. An injury is considered a lost time injury when the injured worker is unable to perform regular job duties, takes time off for recovery for more than one day or is assigned modified work duties while recovering. Lost time injuries encompass both temporary injuries that keep the employee away from work for a day to permanent disabilities and conditions that prevent them from ever returning to the job or performing the same work tasks.
<b>Part/full time employee</b>	A part-time employee is an employee whose working hours per week, month or year are less than full-time. Full-time means the employee's working hours per week, month or year are defined according to national legislation
<b>Permanent employment contract</b>	A permanent employment contract is a contract with an employee, for full-time or part-time work, for an indeterminate period.
<b>Renewable energy source</b>	Energy source that is capable of being replenished in a short time through ecological cycles or agricultural processes, like geothermal, wind, solar, hydro and biomass.

Term	Definition
<b>Renewable material</b>	Material that is derived from bountiful resources that are quickly replenished by ecological cycles or agricultural processes, so that the services provided by these and other linked resources are not endangered and remain available for next generations (e.g., wood, bamboo and cork). Within the polymer and plastics industry, there are new resources available now which are under consideration to be utilised in our products.
<b>Scope of greenhouse gas emissions</b>	Classification by the Greenhouse Gas Protocol of the operational boundaries where greenhouse gas emissions occur.
<b>Scope 1</b>	Greenhouse gas emissions from sources that are owned or controlled by an organisation.
<b>Scope 2</b>	Greenhouse gas emissions that result from the generation of purchased or acquired electricity.
<b>Stakeholder</b>	A stakeholder can be any individual, group or party that has an interest in a company and can either affect or be affected by the business.
<b>Temporary employment contract</b>	A temporary employment contract is of limited duration, and is terminated by a specific event, including the end of a project or work phase or return of replaced employees.
<b>Volatile organic compounds</b>	VOCs are released into the atmosphere by evaporation when solvent-based products are used. It is a diverse group of substances that include petrol, alcohol, solvents, etc.

## GRI Index

## GRI 2 General disclosures 2021

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
2-1	Organizational details	10, 11, 100	No	
2-2	Entities included in the organization's sustainability reporting	10, 11, 28, 101	No	
2-3	Reporting period, frequency and contact point	28, 117	No	
2-4	Restatements of information	10, 11, 63	No	
2-5	External assurance	28	No	
2-6	Activities, value chain and other business relationships	12, 13, 16, 17, 18, 19, 57	No	
2-7	Employees	18, 63	No	
2-8	Workers who are not employees		Yes	Not applicable
2-9	Governance structure and composition	10, 11, 100	No	
2-10	Nomination and selection of the highest governance body		Yes	Confidentiality constraints
2-11	Chair of the highest governance body	6, 7, 10, 11	No	
2-12	Role of the highest governance body in overseeing the management of impacts	6, 7, 10, 11	No	
2-13	Delegation of responsibility for managing impacts	6, 7, 10, 11	No	
2-14	Role of the highest governance body in sustainability reporting	6, 7, 10, 11	No	
2-15	Conflicts of interest		Yes	Confidentiality constraints
2-16	Communication of critical concerns		Yes	Confidentiality constraints
2-17	Collective knowledge of the highest governance body	24, 25, 26, 66, 68, 69	No	
2-18	Evaluation of the performance of the highest governance body	72	No	
2-19	Remuneration policies		Yes	Confidentiality constraints
2-20	Process to determine remuneration		Yes	Confidentiality constraints
2-21	Annual total compensation ratio		Yes	Confidentiality constraints
2-22	Statement on sustainable development strategy	6, 7	No	
2-23	Policy commitments	34, 42, 46, 52, 62, 66, 74, 82, 86, 92, 98	No	
2-24	Embedding policy commitments	34, 42, 46, 52, 62, 66, 74, 82, 86, 92, 98	No	

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
2-25	Processes to remediate negative impacts	24, 25, 34, 42, 46, 52, 62, 66, 74, 92, 98	No	
2-26	Mechanisms for seeking advice and raising concerns	86, 88, 89, 90	No	
2-27	Compliance with laws and regulations	77, 82, 88, 89, 91	No	
2-28	Membership associations	57, 58	No	
2-29	Approach to stakeholder engagement	25, 57, 58	No	
2-30	Collective bargaining agreements	86	No	

## GRI 3 Material topics 2021

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-1	Process to determine material topics	24, 25, 26	No	
3-2	List of material topics	26, 27, 102	No	

## GRI 201 Economic performance 2016

GRI 3/201

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	92	No	
201-1	Direct economic value generated and distributed		Yes	Confidentiality constraints
201-2	Financial implications and other risks and opportunities due to climate change	24, 25, 26, 27, 92, 94, 95, 96, 97	No	
201-3	Defined benefit plan obligations and other retirement plan		Yes	Confidentiality constraints
201-4	Financial assistance received from government		Yes	Confidentiality constraints

## GRI 205 Anti-corruption 2016

GRI 3/205

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	86, 89	No	
205-1	Operations assessed for risks related to corruption	86	No	
205-2	Communication and training about anti-corruption policies and procedures	89	No	
205-3	Confirmed incidents of corruption and actions taken	86	No	



## GRI 301 Materials 2016

GRI 3/301

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	52	No	
301-1	Materials used by weight or volume	53	No	
301-2	Recycled input materials used	53	No	
301-3	Reclaimed products and their packaging materials	53	No	

## GRI 302 Energy 2016

GRI 3/302

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	42	No	
302-1	Energy consumption within the organization	42	No	
302-2	Energy consumption outside of the organization		Yes	Information unavailable/incomplete
302-3	Energy intensity	42	No	
302-4	Reduction of energy consumption	42, 44, 45	No	
302-5	Reductions in energy requirements of products and services		Yes	Information unavailable/incomplete

## GRI 305 Emissions 2016

GRI 3/305

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	34	No	
305-1	Direct (Scope 1) GHG emissions	35,36	No	
305-2	Energy indirect (Scope 2) GHG emissions	35,36	No	
305-3	Other indirect (Scope 3) GHG emissions		Yes	Information unavailable/incomplete
305-4	GHG emissions intensity	36	No	
305-5	Reduction of GHG emissions	34, 35, 36	No	
305-6	Emissions of ozone-depleting substances (ODS)		Yes	Information unavailable/incomplete
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions		Yes	Information unavailable/incomplete

## GRI 306 Waste 2020

GRI 3/306

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	46	No	
306-1	Waste generation and significant waste-related impacts	46, 48, 49, 50, 51	No	
306-2	Management of significant waste related impacts	46, 48, 49, 50, 51	No	
306-3	Waste generated	47	No	
306-4	Waste diverted from disposal	47	No	
306-5	Waste directed to disposal	47	No	

## GRI 308 Supplier environmental assessment 2016

GRI 3/308

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	98, 99	No	
308-1	New suppliers that were screened using environmental criteria		Yes	Information unavailable/incomplete
308-2	Negative environmental impacts in the supply chain and actions taken	98, 99	No	

## GRI 403 Occupational health and safety 2018

GRI 3/403

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	74, 76, 77	No	
403-1	Occupational health and safety management system	76	No	
403-2	Hazard identification, risk assessment, and incident investigation	74, 76, 77	No	
403-3	Occupational health services	74	No	
403-4	Worker participation, consultation, and communication on occupational health and safety	79, 80	No	
403-5	Worker training on occupational health and safety	67, 70	No	
403-6	Promotion of worker health	74	No	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	74, 76, 77, 79, 80	No	
403-8	Workers covered by an occupational health and safety management system (boundaries, availability of data)	74, 76	No	
403-9	Work-related injuries	74, 76, 77	No	
403-10	Work-related ill health		Yes	Information unavailable/incomplete



## GRI 404 Training and education 2016

GRI 3/404

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	66	No	
404-1	Average hours of training per year per employee	67	No	
404-2	Programs for upgrading employee skills and transition assistance programs	68, 69, 70, 71, 72	No	
404-3	Percentage of employees receiving regular performance and career development reviews	67	No	

## GRI 405 Diversity and equal opportunity 2016

GRI 3/405

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	62	No	
405-1	Diversity of governance bodies and employees	63	No	
405-2	Ratio of basic salary and remuneration of women to men		Yes	Confidentiality constraints

## GRI 406 Non-discrimination 2016

GRI 3/406

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	86, 89	No	
406-1	Incidents of discrimination and corrective actions taken	86	No	

## GRI 414 Supplier social assessment 2016

GRI 3/414

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	98, 99	No	
414-1	New suppliers that were screened using social criteria		Yes	Information unavailable/incomplete
414-2	Negative social impacts in the supply chain and actions taken		Yes	Information unavailable/incomplete

## GRI 416 Customer health and safety 2016

GRI 3/416

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	82	No	
416-1	Assessment of the health and safety impacts of product and service categories	82	No	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and service	82	No	

## GRI 418 Customer privacy 2016

GRI 3/418

GRI Disclosure Number	Disclosure Title	Page Ref.	Requirement omitted	Reason for omission
3-3	Management	86	No	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	86	No	

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