

 **TRUVANT**
SUSTAINABILITY
REPORT 2024

TruVant Europe Sp. z o.o.





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Letter from the CEO

At Truivant, our Environmental, Social, and Governance (ESG) initiatives are a priority. It is not just about meeting expectations or keeping up with trends. ESG is about ensuring the work we do today creates a positive and lasting impact on the planet, our people, and our communities. This work is a priority for many of our stakeholders, including our customers, communities, and government bodies. As a leader in packaging services, we have the responsibility and the opportunity to drive change. Our ESG work is guided by a simple but powerful objective: to be the sustainability leader in our industry by focusing on three areas – Planet, People, and Packaging.

We know our work impacts our planet in a variety of environmental ways, and we are committed to reducing negative impact. Our ambition is to become an expert on sustainable packaging solutions design to support our customers in implementing their strategies and achieving their sustainability goals, reducing our direct adverse impact on the environment, including climate. To ensure we stay on track we will measure our consumption of materials, waste disposition, recycling

rates and CO₂ emissions. Our facilities play a leading role in enabling progress in this area. Our organization partners with our customers to innovate and execute more sustainable solutions.

Respect for human rights is a second priority for Truivant. It is critical that Truivant has the right policies in place to protect all our stakeholders and we have renewed our Code of Ethics, Supplier Code of Conduct and Anti-Corruption policy to meet international standards based on the UN Guiding Principles on Business and Human Rights. We are creating a diverse and inclusive work environment where human rights are respected throughout the value chain. Across our business, we offer good and safe working conditions, supporting the development of people at the same time. We will continue to track safety incidents at all our facilities and have training to ensure everyone's safety. We ensure everyone understands Truivant's Code of Ethics. We track employee representation at all levels, conducting gender equality pay assessments annually. We ensure our suppliers are audited by third parties to ensure no human rights violations occur in their operations.

In the area of governance, our ambition is to adhere to the highest ethical standards and be a sustainability leader in the contract manufacturing and packaging industry. We ensure employees are appropriately trained, processes and policies are in place, and everyone has a sense of ownership to make a more positive impact on people and planet. We set the tone from the top and support our employees all over the world to feel enabled and encouraged to take part in Truivant's ESG work.

To achieve our ambitions will require everyone at Truivant to be collaborative and innovative, being open to innovative ideas and creating new and better solutions. We will also work closely with our key suppliers to ensure they understand Truivant's priorities and commit to adhering to our Supplier Code of Conduct.

In summary, at Truivant, we believe in doing business the right way. Our Truivant vision is to be the best packaging solutions partner for consumer brands. We partner with our customers to ensure we deliver high quality products in the most efficient and sustainable way, every day. We fully recognize that consumers



make daily choices about the products they select to care for themselves and their families. Consumers have more choice than ever before, and they are most likely to choose the brands they trust the most. Trust comes with delivering performance and this includes confidence in corporate reputation, caring for people, and protecting our

environment. A big part of reaching our vision is our ambitious commitment to deliver meaningful progress against our ESG initiative – Environmental, Social, and Governance.

Stewart Atkinson
Chief Executive Officer,
Chairman of the Board



1

GENERAL INFORMATION

Report Information

BP-1, BP-2

This report has been voluntarily prepared based on the European Sustainability Reporting Standards (ESRS), introduced by Commission Delegated Regulation (EU) 2023/2772. In accordance with the currently applicable legal regulations, Truvant Europe sp. z o.o. is obliged to prepare a sustainability report for the first time as part of the annual report for the year 2025, based on Articles 63q and 63r, paragraph 1 of the Polish Accounting Act of September 29, 1994.

On February 26, 2025, the European Commission presented a package of legislative proposals aimed at simplifying the EU regulatory framework for sustainable development (the so-called 'Omnibus' package). If the proposed changes are adopted in the legislative process at the European Union level and implemented into national law, the obligation to prepare and publish a sustainability statement in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council will apply to Truvant starting from the financial year 2027.

The information, data, indicators, and statements contained in the report refer

to Truvant Europe sp. z o.o., unless otherwise indicated. Where data was not available, an estimation method was applied. The report covers the period from January 1, 2024, to December 31, 2024.

The company does not disclose information regarding intellectual property, know-how, or innovation outcomes. Information on value chain estimates and sources of estimation uncertainty and results are disclosed along with the respective ESRS thematic areas. As this is Truvant's first report prepared based on ESRS standards, the company does not report any changes in the preparation or presentation of the sustainability statement or errors from previous periods. This report has not been externally verified. The carbon footprint for scopes 1, 2, and 3 is subject to attestation.



Sustainability Management

GOV-1

Truvant Europe Sp. z o.o. is part of the global Truvant Group and is included in the portfolio of The Halifax Group, an American private equity firm based in the United States. The governing body at the global level is the Board of Directors, whose main task is to oversee the management of financial and human capital, remuneration policy, and the implementation of key policies at the Group level. In 2024, the structure of the Board of Directors changed and now consists of 6 members, including the CEO, who also serves as the Chairman of the Board of Directors.

The highest body of Truvant Europe sp. z o.o. responsible for sustainability issues is the Management Board. The company does not have a Supervisory Board. As of December 31, 2024, the Management Board consisted of three members – two women and one man. None of the Management Board members are representatives of employees or other persons providing work.



Board Diversity Ratio:

66%**Grażyna Janina Rakoczy – Vice President of Operations Europe**

– a board member since 2015, has been associated with the industry and the company for 16 years, with experience in operations in Europe.

Magdalena Dłuska – Vice President of ESG and HR Europe

– a board member since 2018, has been associated with the industry and the company for 16 years, with experience in operations in Europe.

Kenneth Scott Lamb – Chief Customer Officer

– a board member of Truvant Europe since 2020, has over 20 years of experience in the packaging industry in the American and European markets.

TRUVANT EUROPE MANAGEMENT BOARD



Grażyna Janina Rakoczy

Vice President of Operations Europe



Magdalena Dłuska

Vice President of ESG and HR Europe



Kenneth Scott Lamb

Chief Customer Officer

As of December 31st, 2024

Responsibility for sustainability issues is assigned to the Vice President of ESG and HR, who is a Member of the Management Board of Truvant Europe. The Vice President of ESG and HR is responsible for overseeing the identification, assessment, and management of significant impacts, risks, and opportunities, including the implementation of policies and due diligence processes in the area of sustainability.

To manage significant ESG issues, the company has established a Sustainability Committee. The Committee includes two members of the Management Board – the Vice President of ESG and HR and the Vice President of Operations. The Committee also includes the Vice President of Business Development, the Finance Director, the Director of Procurement, the Commercial Director, and the Sustainability Manager.

The Committee has a broad range of competencies, which are detailed in the company's ESG policy and include, among others, outlining the vision and level of ambition, setting strategic goals and monitoring progress towards



their achievement, and defining and implementing action plans. During quarterly meetings, the Committee conducts periodic reviews of the sustainability strategy and quarterly operational results, and approves the results of double materiality assessments and sustainability reports.

GOV-4
Key Elements of the Due Diligence Process
Points in the Sustainability Statement

Integration of due diligence into governance, strategy, and business model	S1-1, S2-1, G1-1
Engagement with stakeholders affected by the entity at all key stages of the due diligence process	SBM-2, S1-2, S2-2
Identification and assessment of adverse impacts	IRO-1, SBM-3
Taking action to mitigate identified adverse impacts	S1-3, S2-3, G1-3
Monitoring the effectiveness of these efforts and communicating relevant information in this regard	S1-17, S2-5, GOV-5

Committee members continuously expand their competencies and expertise. All members have undergone training in sustainability, including training on climate change and carbon footprint. Additionally, they participate in conferences, workshops, and training sessions organized by external experts and have access to the knowledge of an external consulting firm, which ensures compliance with legislative requirements, conducts training, and supports Truvariant in implementing sustainability initiatives.

GOV-2, GOV-3

The Truvariant Management Board holds regular meetings to make decisions regarding strategic directions and actions to be taken. To ensure a two-way flow of information, these meetings are attended by senior management, who, during operational meetings with lower-level management, are informed about operational results and risks identified in various ESG areas. Sustainability issues are also discussed during Management Board meetings with representatives of our clients.

Currently, Truvariant does not have a formalized incentive system related to sustainability.

In 2024, the Management Board addressed climate risk related to the increasing expectations of our stakeholders, including clients, regarding the monitoring of emissions and the undertaking of

decarbonization initiatives. In January 2025, the Truvariant Management Board approved the results of the double materiality assessment, along with a list of significant impacts, risks, and opportunities.

GOV-5

The minimization of risks related to the completeness and accuracy of the information included in this report is achieved through:

- For quantitative data, the separation of roles between the person responsible for data collection and the person approving the data (the four-eyes principle).
- Entrusting the creation of the report content to external experts with experience in sustainability reporting, including reporting in compliance with ESRS. The content has been reviewed and approved by Truvariant's ESG department and the units responsible for the respective sustainability areas.
- The final content of the report has been approved by the Sustainability Committee.

Value Creation Model, Business Model and Strategy

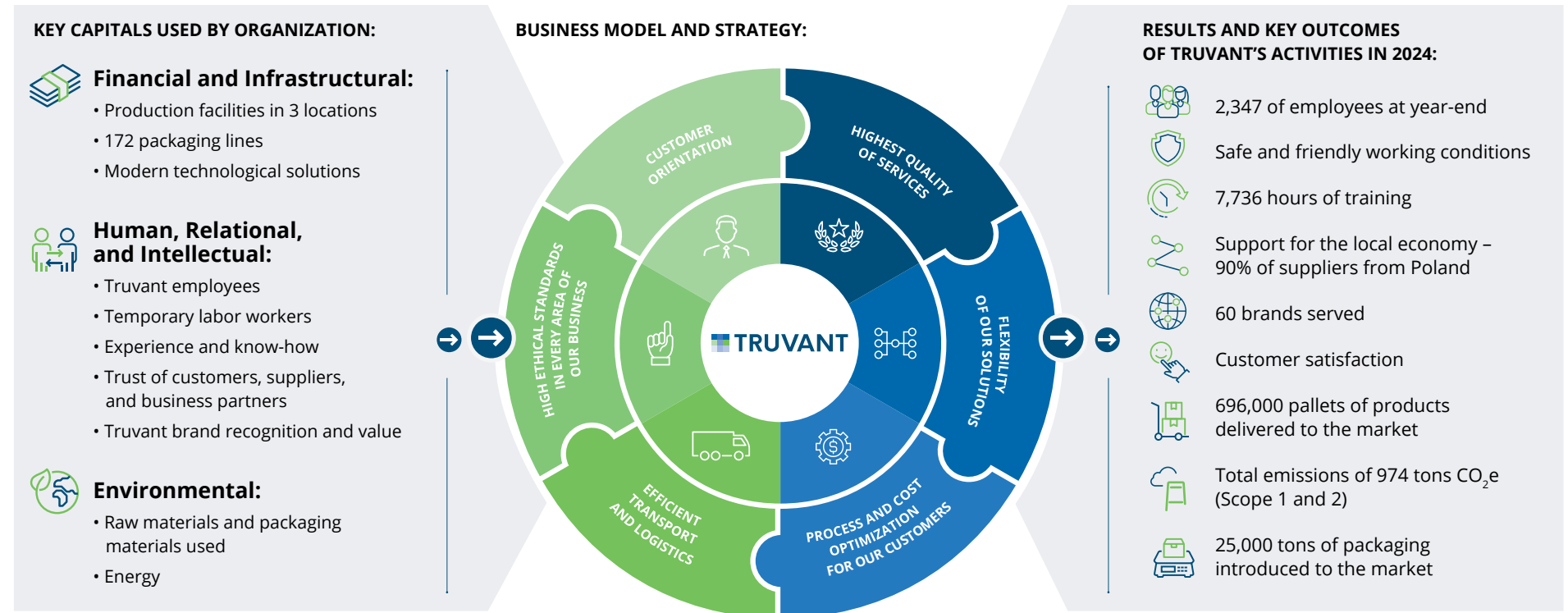
SBM-1

Truvant Europe sp. z o.o. is a global leader in contract packaging. The company has been operating in Poland since 2004. Truvant has facilities in three locations: Łódź, Wrocław, and near Stryków.

The company is the world's largest provider of packaging solutions, offering a full range of services – from packaging design and development, through sourcing and purchasing materials, to comprehensive value chain management. Truvant's mission is to support clients in efficiently bringing products to market while maintaining the highest quality, operational, and ethical standards. Products packaged in the company's Polish facilities reach over 40 countries in Europe, the Middle East, Africa, and Asia.

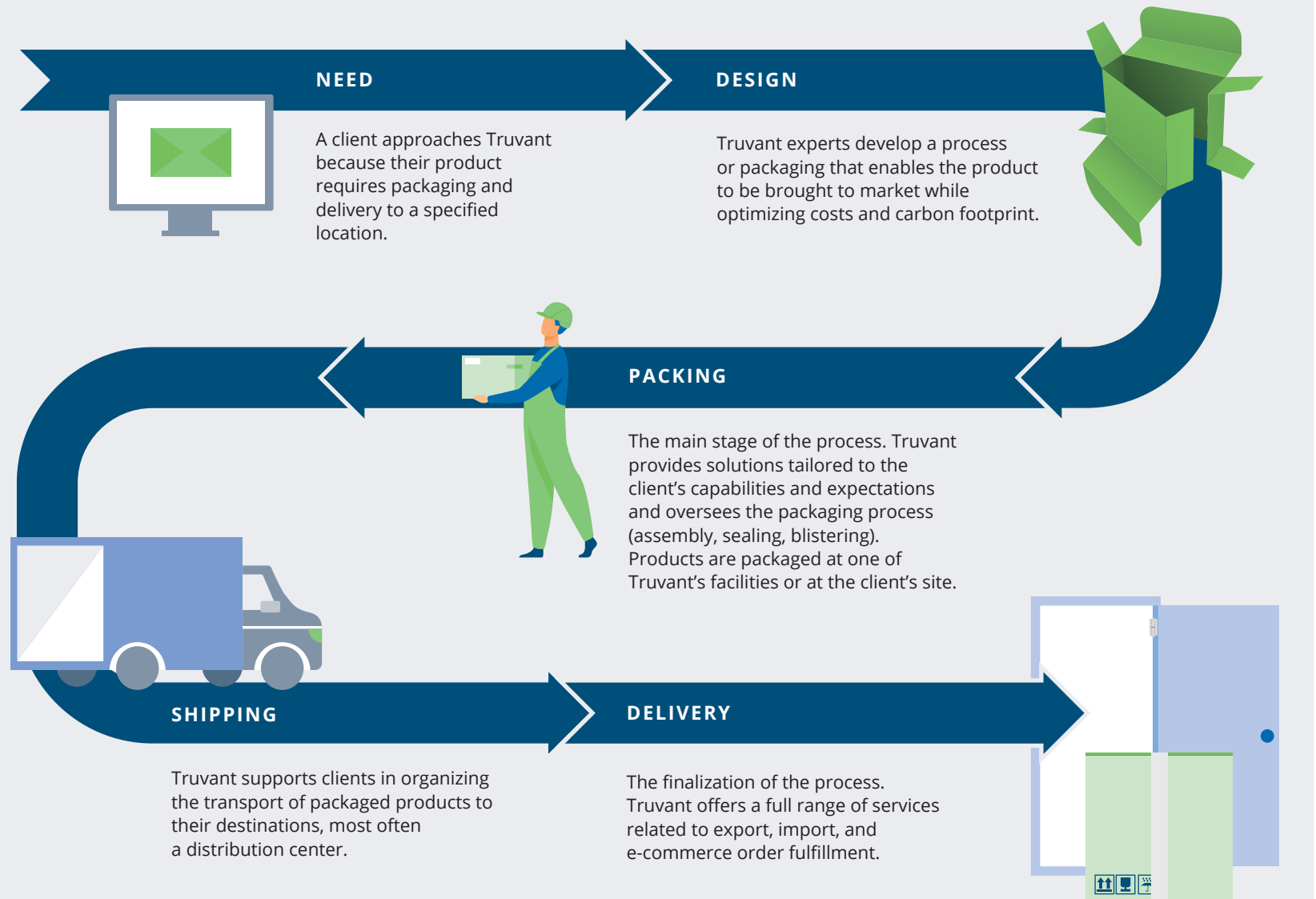
Value Creation Model

Truvant's value creation model illustrates how the company transforms input resources, such as raw materials, energy, and human capital, into value for customers through its business model. This process results in finished products, efficient logistics solutions, and economic, environmental, and social impacts.



Business Model

Truvant's greatest competitive advantage is understanding customer needs and creating optimal solutions for them – this has earned the trust of the largest global brands in the consumer goods sector. The contract packaging services provided by Truvant are based on various business models depending on the client's needs and expectations. Truvant procures packaging or packaging materials, packages the products supplied by the customer, and then delivers the products to the specified location, most often a distribution center.



Truvant provides the following services:

Packaging design and sourcing and optimization of packaging materials.

1



Packaging at a Truvant-managed facility serving multiple clients.

3



Supporting the client in managing the packaging process at their production facility, distribution center, or warehouse.

2



Managing deliveries, distribution, and product delivery to sales markets.

4

Served segments:

-  Beautycare
-  Shavecare
-  Homecare
-  Medical devices
-  Oralcare
-  Adhesives
-  Batteries
-  Toys
-  Healthcare

During the reporting period, there were no significant changes regarding the services offered by Truvant or the markets and customer groups served.

Strategy

Truvant strives to conduct its business sustainably, taking into account the needs and expectations of stakeholders. In 2021, consultations were held with employees from various departments and locations to define ambitions, goals, and actions aimed at developing the company's business sustainably.



PLANET

Greenhouse gas emissions
Circular economy
Green culture



PEOPLE

Employees
Societies
Ethics






PACKAGING

Supply chain
Operational processes
Business development



As a result of these efforts, a formalized sustainability strategy was established, encompassing three key areas: environment, society, and corporate governance. The established ambitions and goals consider the specifics of the services provided, customer needs, market characteristics, and the expectations of key stakeholders. The following summary presents the main assumptions of Truvant’s sustainability strategy.

AREA	AMBITIONS	GOALS	KEY CHALLENGES, ACTIONS, AND PROJECTS
Environment 	Become an expert on sustainable packaging solutions design to support our customers in implementing their strategies and achieving their sustainability goals	<ul style="list-style-type: none"> Expanding knowledge and competencies in sustainable packaging; Adopting a proactive approach in proposing more sustainable packaging to clients. 	<ul style="list-style-type: none"> In close collaboration with clients, transitioning from plastic packaging to paper alternatives; Optimizing logistical and operational processes; Gradually increasing the share of sustainable raw materials in the packaging process.
	Reduce our direct impact on climate and the environment	<ul style="list-style-type: none"> Continuous improvement of waste management; Optimization of raw material consumption; Deploying environmental requirements to suppliers; Environmental education for employees. 	<ul style="list-style-type: none"> Monitoring energy consumption and carbon footprint across all three emission scopes; Taking actions to improve energy efficiency and reduce emissions; 100% of production waste is segregated; Utilizing renewable energy sources.
Social 	Create a diverse and inclusive workplace where human rights are respected throughout the value chain	<ul style="list-style-type: none"> Promoting a culture of diversity within the organization; Creating working conditions conducive to employing people with disabilities; Promoting respect for human rights, both within Truvant and throughout the value chain. 	<ul style="list-style-type: none"> Monitoring diversity indicators and gender pay gap and taking actions to improve them; Training leaders on human rights.
	Offering good and safe working conditions, supporting the development of our employees at the same time	<ul style="list-style-type: none"> Increasing employee satisfaction and development opportunities; Actively shaping a safety culture that goes beyond legal requirements; Promoting a healthy lifestyle. 	<ul style="list-style-type: none"> Expanding training offerings and increasing training hours for workers; Conducting employee satisfaction and engagement surveys and implementing actions based on the results.
	Collaborate with valued suppliers and NGOs on significant social and environmental challenges	<ul style="list-style-type: none"> Launch Sustainable Procurement program; Encouraging and supporting employee social and environmental engagement. 	<ul style="list-style-type: none"> Developing annual training for Procurement organization and suppliers; Collaboration with environmental and social organizations.
Corporate Governance 	Adhere to the highest ethical standards	<ul style="list-style-type: none"> Improving policies supporting adherence to ethical standards and educating employees on them. 	<ul style="list-style-type: none"> Seeking new solutions and improving existing policies, systems, and procedures related to sustainable development.
	Become an industry leader in sustainability	<ul style="list-style-type: none"> Developing a detailed action plan for sustainability and setting key indicators. 	

Our Commitment to Sustainability

SBM-1

Our Truvant vision is to be the best packaging solutions partner for consumer brands. We partner with our customers to ensure we deliver high quality products in the most efficient and sustainable way, every day. Everyone at Truvant has the responsibility to

contribute to our ESG goals, ensure training is complete and that we are continually making progress against our goals. Our Ambitions are clear and will serve as the direction of this work while we track progress clearly and transparently.



Sedex² | Member

As a SEDEX member we are committed to being a responsible and sustainable business. This Supplier Ethical Data Exchange Platform significantly supports our company's sustainable development strategy by enhancing supply chain transparency, promoting ethical labor practices, supporting environmental sustainability, and driving continuous improvement. SEDEX's platform allows us to monitor and manage ethical practices, ensuring fair labor conditions and responsible sourcing. This aligns with our commitment to the Sustainable Development Goals (SDGs), such as decent work, ultimately fostering a culture of continuous improvement and contributing to global sustainability efforts.

CDP

CDP (Carbon Disclosure Project) reporting significantly supports our packaging company's sustainable development strategy by promoting transparency and accountability in environmental practices. By disclosing data on climate change, water security, and deforestation, CDP helps us track and manage our environmental impact. This aligns with our commitment to sustainability goals, such as monitoring and reducing carbon emissions and enhancing resource efficiency.

In 2024, our company received a C score in Climate, Forest and Water, reflecting our ongoing efforts and areas for improvement. CDP's comprehensive data collection and reporting framework enable us to make informed decisions, drive continuous improvement, support our customers on their sustainability journey, and contribute to a net-zero future.



EcoVadis plays a crucial role in advancing our policies and practices by providing a comprehensive sustainability assessment that evaluates our environmental, social, and ethical performance. In 2023, our company received a bronze medal, and in 2024, we were awarded a "committed" badge as a company, improving our results year over year. EcoVadis's detailed insights and benchmarking capabilities enable us to drive continuous improvement, align with global sustainability standards, and contribute to a more sustainable future.

Value Chain

SBM-1

Truvant provides services to global brands in the FMCG sector and is an integral part of their value chain. As part of the materiality assessment, a detailed value chain model of the company was developed, which includes its own operations, upstream processes, and downstream processes. The key elements of Truvant's value chain are presented below:

Suppliers

(upstream, tier 1)

- Suppliers of direct production materials – primarily companies involved in packaging production, printing houses, and suppliers of consumables such as pallets, stretch film, and external labels. Depending on the client and the nature of the services provided, Truvant collaborates with suppliers selected based on the company's and its clients' criteria or with suppliers directly indicated by Truvant's clients.
- Suppliers of packaging lines and machinery and spare parts.
- Suppliers of components or so-called FWIP (finish work in process), clients' products packaged by Truvant, such as cosmetics, toys, and batteries.
- Service providers – owners of warehouses rented by Truvant for service provision, logistics and transport companies that transport packaged products to clients' distribution centers, and temporary employment agencies and outsourcing companies providing production workers. Additionally, the company collaborates with service providers in the areas of training, IT, machine rental, employee transport, catering, cleaning, and security.

Suppliers

(upstream, tier 2+)

- Suppliers of raw materials and materials used for the production of plastic, cardboard, paper, and wood packaging.



Transport and Logistics Services

(upstream, downstream)

- Upstream transport – transport of packaging and production materials organized by Truvant or suppliers, occurring between the supplier's facility and the company's facility. Truvant does not own its own fleet.
- Downstream transport – distribution of products packaged by Truvant is carried out by logistics companies that have business relationships with Truvant's clients or collaborate directly with the company.

Clients

(downstream)

- The company's clients are large global FMCG companies for which contract packaging services are provided. Truvant also provides e-commerce services, including the fulfillment of individual orders placed by end-users through the client's website.

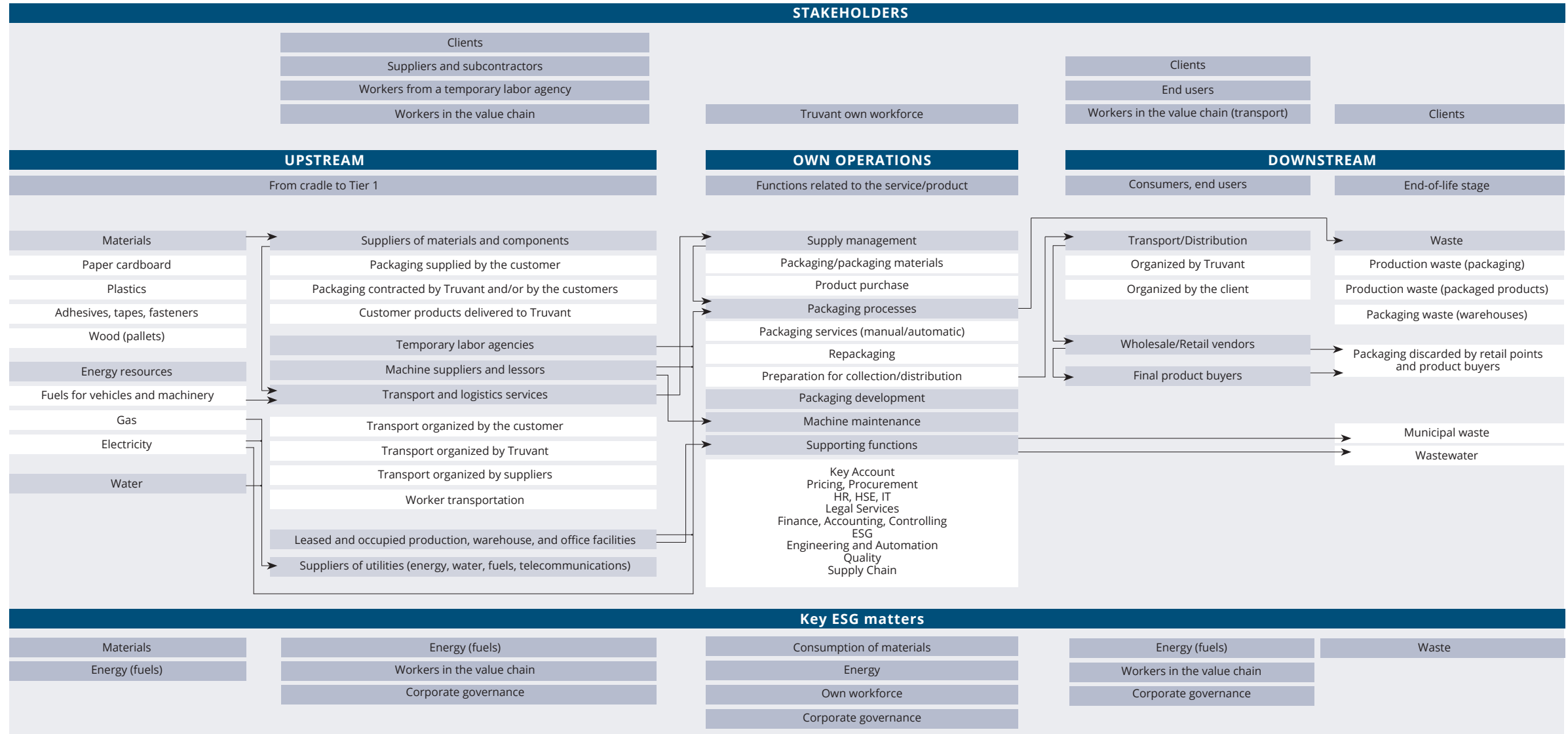
End-users and End of Life Cycle

(downstream)

- End-users are consumers purchasing the products of Truvant's clients. At this stage of the value chain, significant amounts of waste can be generated – both at the beginning of product use, when the packaging is disposed of, and after the product's lifecycle ends, when the purchased product itself becomes waste.



A detailed diagram of Truvant's value chain is included below:





STAKEHOLDER GROUPS			
	↓	↓	↓
	Clients	Workers	Suppliers
BRIEF DESCRIPTION OF THE GROUP	Companies mainly operating in the consumer goods, electronics, and hygiene products sectors that commission Truvant for packaging services.	Individuals employed by Truvant under employment contracts, collaborating under non-employment contracts, or working based on agreements with temporary employment agencies.	Suppliers of materials, packaging, components, machinery, and services necessary for Truvant to provide packaging services.
ENGAGEMENT METHODS	Regular operational, project, strategic, and summary meetings. Satisfaction surveys.	Employee engagement surveys, intranet, information on canteen TVs, Trunews (semi-annual employee magazine), newsletters, information boards.	Regular meetings, audits of key suppliers, annual cooperation summary meetings, webinars

Truvant conducts communication activities with these groups to better understand their needs, continuously monitor their opinions, and inform them about the actions taken by Truvant. The company's Management Board is regularly informed about the key insights from stakeholder interactions and actively participates in some of the communication activities. These insights are considered when shaping Truvant's strategy.

Significant Impacts, Risks, and Opportunities

SBM-3

According to the results of the double materiality assessment, the following sustainability topics have been identified as significant:

- Climate change – ESRS E1
- Resource use and circular economy – ESRS E5
- Own workforce – ESRS S1
- Workers in the value chain – ESRS S2
- Business conduct – ESRS G1

All the above topics are significant from both an impact perspective and a financial perspective. The characteristics of these topics, considering both perspectives, are presented below.

Climate change



Impact perspective

The impact primarily arises from greenhouse gas emissions within Truvant's value chain, with a lesser extent related to the company's own operations. The production of packaging materials, such as plastic, paper, and cardboard, generates greenhouse gas emissions during raw material extraction, processing, and transportation. Packaging and storage processes require electricity and heat, the source of which affects emission levels. Additionally,

the transportation of raw materials, packaging, and finished products results in emissions, depending on the type of transport used. Truvant has limited control over emissions not related to its own operations. The company manages emissions from its own operations (Scope 1 and 2) through optimizing operational processes, transitioning to green energy sources, and investing in energy-efficient technologies.

Financial perspective

Climate change presents both risks and opportunities. Increasing customer expectations and regulatory pressure related to reducing greenhouse gas emissions may lead to additional costs, including the need to invest in emission-reducing technologies. At the same time, appropriately adapting to these changes offers the opportunity to attract new customers and improve competitiveness.

Resource use and circular economy



Impact perspective

Truvant's operations involve the use of natural resources at various stages of the value chain, particularly in the production of packaging materials such as plastic and paper. The extraction and processing of these raw materials require energy and can lead to the depletion of natural

resources. Additionally, generated waste, if not properly managed, can end up in landfills or the environment. Truvant manages this impact by designing packaging that reduces the amount of materials used and by efficiently managing waste in the packaging, storage, and transportation processes.

Financial perspective

This issue presents both risks and opportunities. Limited access to raw materials or rising material costs can pose financial risks, potentially increasing operational costs and affecting margins. Conversely, investments in solutions and technologies that enable the reuse of raw materials and waste reduction can lead to lower operational costs. Implementing circular economy principles can also open new business opportunities and increase Truvant's resilience to raw material price fluctuations.

Own workforce**Impact perspective**

The company influences this issue through employment conditions, workplace safety, and development opportunities. The nature of work in packaging facilities may involve repetitive tasks and shift work, which can affect health and work-life balance. Ensuring safe working conditions, especially in

areas involving machinery operation and internal transport, is also crucial. Truvant manages this impact by monitoring working conditions, adhering to health and safety standards, and providing employee training. The company also strives to offer competitive wages and stable employment forms.

Financial perspective

Human capital is crucial to Truvant's financial performance. Wage costs, employee turnover, and employment conditions impact operational efficiency and profitability. Investing in good working conditions, competitive wages, and professional development also

presents a significant opportunity for the company, potentially leading to increased productivity, reduced employment-related costs, and improved long-term financial stability.

Workers in the value chain**Impact perspective**

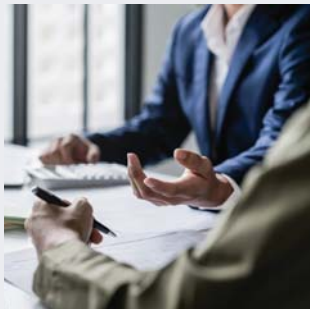
The indirect impact arises from Truvant's value chain, both upstream and downstream, including workers employed by raw material suppliers, packaging manufacturers, and transportation and logistics companies. These sectors may face challenges related to workplace safety, wages, job

stability, and working hours. Although Truvant does not have direct control over this impact, it takes actions focused on collaborating with suppliers who must adhere to specific health and safety standards and ethical norms. The company implements policies regarding supplier audits and the evaluation of their labor practices.

Financial perspective

This issue can pose a risk factor related to inadequate working conditions, low wages, and excessive working hours. Low wages can lead to high employee turnover at suppliers, potentially causing delays or disruptions in the supply chain. Excessive workload and insufficient enforcement of health and

safety standards can result in increased absenteeism, affecting supply stability and service quality. Additionally, reputational risk arising from improper employment practices can lead to a loss of trust among business partners and weaken Truvant's market position.

Business conduct**Impact perspective**

Business practices influence working conditions in the value chain and affect business ethics. Timely payments and transparent collaboration with suppliers can support the stability of their operations and improve employment conditions. Conversely, payment

delays or insufficient control over ethical standards can lead to labor cost pressures, labor rights violations, and corruption risks. Effective whistleblower protection and a strong corporate culture reduce the risk of misconduct and strengthen stakeholder trust.

Financial perspective

This issue can impact Truvant's financial stability and reputation. Poor supplier relationships, including late payments or lack of transparency, can lead to disruptions in the value chain and increased operational costs. Corruption risks and inadequate whistleblower protection can result in legal sanctions

and loss of trust among business partners. On the other hand, a strong corporate culture based on ethics, transparency, and accountability can improve relationships with business partners and contribute to greater trust and loyalty from the company's customers.

Materiality Assessment

IRO-1

At the turn of 2023 and 2024, the company conducted a double materiality assessment aimed at identifying significant impacts, risks, and opportunities related to sustainability, and determining which ESRS thematic standards and disclosure requirements should be included in Truvant's sustainability statement. The materiality assessment was carried out in collaboration with a consulting firm, in full compliance with ESRS requirements. The materiality assessment process included the following stages:

- Analysis of source data;
- Benchmarking analysis of industry peers;
- Questionnaire survey conducted among senior management representatives and external experts;
- Questionnaire survey and structured interviews with key internal and external stakeholders, representing groups such as customers, suppliers, and employees;
- Matrix analysis of the results;
- Preparation of the final report.

The results of the matrix analysis were the subject of a validation workshop in January 2025, attended by members of the company's Management Board and the Sustainability Committee.

Double materiality principle

The materiality assessment was conducted in accordance with the double materiality principle, which involves assessing the significance of issues from the perspective of the impact Truvant has on people and the environment, as well as from the financial perspective, i.e., the impact of a given sustainability issue on the company's financial performance. Any sustainability issue associated with a significant impact, risk, or opportunity was considered material from the double materiality perspective.

Impact materiality perspective

The identification and assessment of impacts were conducted in the context of Truvant's operations, value chain, and business relationships. The identification included positive and negative, as well as actual and potential impacts. The assessment considered the severity of the impact and its likelihood.

Severity was evaluated based on three parameters:

- **Impact Magnitude** – how severe the negative impact is or how beneficial the positive impact is on people or the environment.
- **Impact Scope** – the extent of the impact. For environmental issues, this refers to the geographical area. For social issues, it refers to the number or percentage of people affected.
- **Irreversibility of Impact** – whether the negative impact can be remedied and the resources required to restore the original state or minimize the impact.

Likelihood of impact occurrence, determines whether the impact is currently occurring or may occur in the future.

The assessment of impacts utilized information obtained from benchmarking analysis, stakeholder interviews, internal expert questionnaires, and evaluations by external experts. Data from the assessment of parameters from each of these information sources were then consolidated into a five-point materiality

scale (minimal, informational, important, significant, critical). Any issue with an impact assessed as important, significant, or critical was considered material from the impact materiality perspective.

Financial materiality perspective

Financial materiality was determined by identifying and assessing risks and opportunities related to specific sustainability issues, using the following parameters:

- The scale of the impact of the risk or opportunity, understood as negative (in the case of risks) or positive (in the case of opportunities) deviations in future expected cash flows or expected changes in off-balance-sheet capital.
- The likelihood of the materialization of specific risks and opportunities.

Risks and opportunities were assessed concerning six types of capital: financial, natural, manufactured, intellectual, human, and social and relationship. As with the impact assessment, data from the assessment of risk and opportunity parameters were consolidated into a five-point materiality

scale (minimal, informational, important, significant, critical). Any issue with an impact assessed as important, significant, or critical was considered material from the financial materiality perspective.

Changes to the materiality assessment process

This was the first materiality assessment conducted by Truvant using the methodology described above. The review and update of the methodology will be carried out no later than three years from the completion date of the current assessment.





2

ENVIRONMENT

Climate Change

ESRS E1

Climate change is increasingly impacting Truvant's business operations and the environment in which it operates. The company recognizes that the effects of climate change translate into both operational risks and the expectations of customers, suppliers, and other stakeholders in the value chain.

Consequently, Truvant takes actions to mitigate its own impact and manage the risks and opportunities associated with this area.

Impacts, Risks, and Opportunities

SBM-3

Impacts

Despite providing low-emission services, Truvant's operational activities generate direct and indirect greenhouse gas emissions. The negative impact on climate change primarily results from indirect emissions in the supply chain, including emissions related to the production of packaging materials used in contract packaging services.

Risks

Significant climate change risks include both physical and transition risks that affect the company's operations, financial situation, and position. Physical risks arise from the direct effects of climate change and include phenomena such as heatwaves, severe frosts, storms, floods, and droughts. Their intensification may lead to increased energy costs, infrastructure repairs, and operational disruptions. Long-term water shortages and rising sea levels may also affect the availability of raw materials and increase logistics and transportation costs.



Transition risks are associated with regulatory, technological, and market changes resulting from the transition to a low-emission economy. The introduction of new burdens, such as carbon taxes or tariffs, emission standards, or reporting obligations, may generate additional costs related to compliance with new regulations and the risk of fines or sanctions in case of non-compliance. Additionally, customer expectations or requirements for implementing low-emission solutions may lead to loss of competitiveness, increased service costs, or the need for additional investment expenditures.

Opportunities

Changing regulations also create opportunities, including the potential for growth through investments in modern, low-emission technologies. Implementing these solutions leads to process optimization, reduced energy consumption, and lower operational costs, which in the long term can translate into increased competitiveness and opportunities to acquire new customers and contracts.

At the same time, growing environmental awareness among consumers and changing preferences create new market

opportunities. This trend supports the development of more sustainable packaging solutions based on new materials and technologies, enabling better adaptation of the offer and opening new market opportunities.



Management Approach

E1-2, E1-3

Managing environmental aspects, including climate change, is an integral part of Truvant's overall approach to sustainable development. The company's organizational structure includes specialized EHS (environment, health & safety) units responsible for operational management of the environmental area in production facilities. Environmental topics are also considered in the activities of other key functions – the Procurement Department integrates environmental requirements into supplier qualification and evaluation processes, and the ESG Team supports, implements, and develops environmental initiatives, including those related to climate change, at the strategic level.

ESG Policy

Truvant's ESG Policy is the most important strategic document in the area of sustainable development. It outlines the company's approach to environmental, social, and governance issues and sets the directions of actions and strategic goals, including those related to combating climate change and improving energy efficiency. This document is part of Truvant's long-term strategy and forms the basis for effective management of impacts, risks, and opportunities in all significant sustainable development issues for the company and its stakeholders.

The ESG Policy covers all locations where Truvant operates, and the responsibility

for its implementation rests with the Vice President of ESG & HR Europe. The identification of key areas and issues of the Policy was carried out through workshops and surveys involving the company's main stakeholders – employees, suppliers, and customers. Their needs and expectations were considered in the process of creating the ESG Policy.

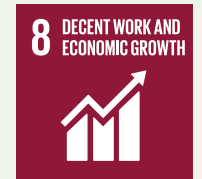
In the area of climate change, Truvant commits in the Policy to:

- Monitoring absolute levels of energy consumption;
- Improving energy efficiency by identifying areas for improvement, implementing innovations, and conducting periodic energy audits;
- Using energy from renewable sources;
- Monitoring greenhouse gas emissions directly resulting from operational activities;
- Estimating indirect emissions in the value chain;
- Conducting educational activities for employees on climate change, energy efficiency, and carbon footprint;
- Regularly publishing emission data in sustainability reports and developing a decarbonization pathway in collaboration with customers.



These commitments align with the UN Sustainable Development Goals, including:

- Goal 7: Clean Energy;
- Goal 8: Economic Growth and Decent Work;
- Goal 12: Responsible Production and Consumption;
- Goal 13: Climate Action.



The ESG Policy is communicated by Truvant both internally, through the company's internal communication channels, and externally, in contacts with business partners.

The content of the Policy regarding other significant ESG issues is described in the *Management Approach* sections of the corresponding subchapters of the report.



Climate and Environmental Actions

Since 2022, Truvant has supported ecosystem restoration through the Re:Generation program and cooperation with UNEP/GRID-Warsaw. Thanks to Truvant's support, reclamation work and mowing of clearings were carried out in 2024 in Park Krajobrazowy Wzniesień Łódzkich (the Łódź Hills Landscape Park) to preserve biodiversity. These activities contribute to improving the state of urban ecosystems, positively impacting the environment and human health, and supporting the realization of the UN goal – Climate Action.

Experts from UNEP/GRID-Warsaw conducted an educational webinar for Truvant employees titled „Invite Nature into Your World.” During the meeting, they presented the relationships between nature and its laws and their impact on human condition, health, and well-being. They also introduced interesting ways to observe nature and simple experiments to learn the rules governing it.

Additionally, each participant of the live webinar contributed to planting a tree as part of the posadzimy.pl campaign. In the spring tree planting campaign, Truvant funded 100 seedlings.

Another initiative supporting environmental education for employees was the „No Litter Day” campaign organized with the participation of our partner, Rekopol. This event took place at two facilities, in Łódź and Wrocław, and focused on promoting proper waste segregation principles. Employees,



both office and production, were invited to actively engage in the form of competitions and games.



Since 2021, Truvant has been implementing the TruGreen project, which involves engaging and educating employees on ecology through various activities, competitions, and

informational bulletins. In 2022, members of the TruGreen team initiated a world cleanup campaign, which is continued annually. In 2024, willing Truvant employees and their families participated in cleanup work in Las Łagiewnicki (the Łagiewniki Forest). After the cleanup, an integration bonfire was held, and each participant, even the smallest one, supported the autumn tree planting with posadzimy.pl.

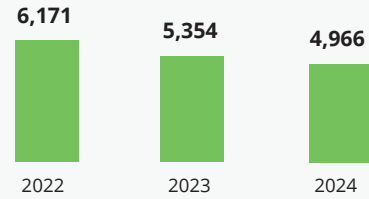
Energy and Energy Efficiency

E1-3, E1-5

Energy efficiency is a significant element of Truvant's commitments under its ESG Policy. Efforts to reduce energy consumption not only lower operational costs but also bring many environmental benefits, including reducing greenhouse gas emissions and conserving natural resources.

Since 2022, the company has been monitoring energy efficiency indicators and annually setting operational goals aimed at reducing energy consumption. Truvant's goal for 2024 was to reduce electricity consumption by 5% compared to 2023. The goal was achieved – the company's electricity consumption in 2024 was over 7% lower compared to 2023.

TRUVANT'S ELECTRIC ENERGY CONSUMPTION [MWH/YEAR]



The main actions taken by Truvant to reduce electricity consumption include:

- Monitoring electricity consumption and implementing energy-saving projects;
- Regular inspections, maintenance, and modernization of energy-consuming equipment;
- Automation and optimization of production machinery operations;
- Replacing lighting with LED technology;
- Sealing leaks in compressed air systems and conducting regular system leak audits;
- Optimizing the placement and reducing the density of lighting in certain production areas;
- Installing automatic lighting systems.

In 2025, the company also set an operational goal related to reducing electricity consumption:

Operational goal related to electricity consumption	Scope of goal	Measure	2022	2023	2024
Reduce the amount of electricity consumed by 2% by 2025 (compared to 2024)	Own Operations	Amount of electricity consumed in production facilities (MWh)*	6,171	5,354	4,966

* Does not include facilities in Łódź, where the undertaking operates in buildings managed by its client

E1-5

Energy consumption and energy mix	Unit	2024
Fuel consumption in own vehicle transport	MWh	264
Fuel consumption from natural gas	MWh	730
Fuel consumption from other fossil sources (LPG)	MWh	3,197
Total energy consumption from fossil sources	MWh	4,191
Share of fossil sources in total energy consumption	%	46
Share of nuclear energy in total energy consumption	MWh	0
Share of nuclear energy in total energy consumption	%	0
Energy consumption of electricity, heat, steam, and cooling purchased or sourced from renewable sources	MWh	4,966
Total energy consumption from renewable sources	MWh	4,966
Share of renewable sources in total energy consumption	%	54
Total energy consumption	MWh	9,157

Truvant's ability to increase energy efficiency and achieve operational goals in this area largely depends on the availability and proper allocation of resources, particularly:

- **Financial resources** – due to investment costs associated with implementing new technologies and modernizing existing infrastructure;
- **Technological resources** – access to modern solutions such as energy management systems, process automation, and energy-efficient machinery;
- **Human resources** – including qualified personnel capable of effectively managing energy consumption and implementing optimization projects.

The buildings where Truvant operates are new large-scale facilities built using modern technologies and meeting energy efficiency standards. In leased buildings, the purchased electricity is supplied from renewable sources, confirmed by green energy certificates from suppliers.

Truvant's total energy consumption in 2024 was 9,157 MWh, which was 5% lower compared to 2023.

Truvant does not operate in sectors with significant climate impact. Therefore, the company does not disclose energy intensity relative to revenues from these sectors.



Greenhouse Gas Emissions

E1-6

The company actively manages greenhouse gas emissions, treating their monitoring as an integral part of operational activities. The basis of these actions is the calculation of direct and indirect emissions according to the guidelines of the GHG Protocol Corporate Standard. Based on operational control, organizational boundaries for Truvant's

carbon footprint calculation were defined, covering three locations:

- Stryków,
- Łódź¹,
- Wrocław.

The calculation of the company's carbon footprint included all greenhouse gases listed in the GHG Protocol standard, which are:

- Carbon dioxide (CO₂),
- Methane (CH₄),
- Nitrous oxide (N₂O),
- Sulfur hexafluoride (SF₆),
- Perfluorocarbons (PFC),
- Hydrofluorocarbons (HFC),
- Nitrogen trifluoride (NF₃).

The latest global warming potential (GWP) coefficients over a 100-year

horizon, published in the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC AR6), were used for calculations.²

To calculate the carbon footprint, the company used widely available greenhouse gas (GHG) emission factors, allowing the conversion of energy, fuel, and material consumption into the corresponding amount of emissions expressed in metric tons of carbon dioxide equivalent (MgCO₂e). These GHG factors were selected based on three criteria:

- **Temporal relevance** – emission factors relevant to the reporting period (2024) or, in their absence, the latest available data were used;

- **Geographic representativeness** – factors corresponding to the region where the emission occurs were selected;
- **Technological fit** – the characteristics of the technology from which the emissions originate (e.g., type of fuel) were considered.

These factors come from recognized, peer-reviewed, officially published sources:

- National and international research centers,
- Industry associations,
- Centers responsible for legal regulations, monitoring, and statistics in relevant areas.



Greenhouse gas emissions of the company were calculated for the fiscal year 2024, which is from January 1 to December 31, 2024.

E1-6

Greenhouse gas emissions in Scope 1, 2, 3 in MgCO ₂ e according to the market-based method	2022	2023 ³	2024
Gross greenhouse gas emissions in Scope 1	1,454	1,120	974
Gross greenhouse gas emissions in Scope 2	2	0	0
Gross greenhouse gas emissions in Scope 3 (without category 12)	84,835	72,935	78,628
Gross greenhouse gas emissions in Scope 3 (including category 12)	-	-	92,700
Total greenhouse gas emissions	86,291	74,055	93,674

¹ Operations in Łódź are conducted on the client's campus and remain partially outside the company's direct operational control. Therefore, emissions in Scope 1 (except for fuel consumption in leased vehicles and refrigerants managed by Truvant) and Scope 2 were not included for the Łódź facility.

² Exceptions are the emission factors for Scope 3 derived from the database: – DEFRA 2024, expressed in CO₂ equivalent units, in which the Fifth Assessment Report of the Intergovernmental Panel for Climate Change (IPCC AR5) was applied, and – EXIOBASE 2022, in which the average GWP value for methane was used.

³ The company recalculated the data in Scope 3 for 2023. The change in emission values is primarily due to a change in the sources of some CO₂ emission factors, more regionally appropriate factors were selected, and previously unidentified errors were corrected. The changes made improved the accuracy of the calculation and ensured comparability of the company's emissions in 2023 and 2024.



Scope 1

Scope 1 includes direct emissions within Truvant’s operations. This category includes emissions from the combustion of natural gas, LPG, and fuels in leased vehicles, as well as emissions from refrigerant leaks from air conditioning systems. The largest source of direct emissions in Scope 1 was emissions from the combustion of LPG and natural gas for heating buildings. Scope 1 emissions in 2024 were lower by 13% compared to the previous year, primarily due to lower gas consumption and fewer refrigerant leaks from air conditioning systems.

Scope 2

Scope 2 includes indirect greenhouse gas emissions resulting from the purchase of electricity. These emissions occur at the place of energy generation, outside Truvant’s organizational boundaries.

Emissions were calculated using two methods:

- Market-based – based on the emission factor provided by the energy supplier;
- Location-based – using the national emission factor for electricity.

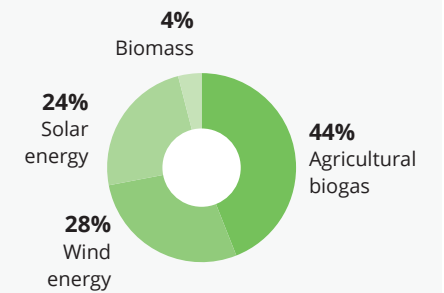
In 2024, the carbon footprint in Scope 2, calculated using the location-based

method, was lower by 19% compared to 2023, due to reduced electricity consumption. The market-based emissions in 2024 were 0.46 MgCO₂e. Guarantees of origin for renewable energy cover 100% of electricity consumption in Stryków and Wrocław.

In Stryków, Truvant uses contractual instruments combined with energy generation attributes (energy bundled), ensuring that 100% of the electricity used comes from wind energy.

In Wrocław, the company uses contractual instruments based on unbundled energy attribute statements (energy unbundled), ensuring that 100% of the electricity used comes from the following renewable sources:

STRUCTURE OF RENEWABLE ENERGY IN WROCLAW IN 2024



E1-6

Greenhouse gas emissions in Scope 2 in MgCO ₂ e	2022	2023	2024
Greenhouse gas emissions in Scope 2 according to the location-based method	4,369	3,668	2,965
Greenhouse gas emissions in Scope 2 according to the market-based method	2	0	0

Scope 3

Scope 3 includes other indirect greenhouse gas emissions throughout the value chain – both upstream (e.g., raw material production, transport to facilities) and downstream (e.g., distribution, use, and disposal of packaging). These emissions largely remain outside Truvant’s direct control. In the various categories of Scope 3, significant emission categories were included according to the methodology in the GHG Protocol Corporate Value Chain (Scope 3) Standard:

- **Category 1:** Purchased goods and services – emissions resulting from water consumption, purchase of materials and raw materials, protective clothing, spare parts, as well as from employment agencies, outsourced services, cleaning, security, IT, rental, and catering;
- **Category 2:** Capital goods – emissions resulting from the purchase of computer equipment, licenses and software, furniture, machinery and equipment, as well as emissions related to the repair and installation of these goods;
- **Category 3:** Emissions related to energy and fuels not included in Scope 1 and 2 – well-to-tank emissions at earlier stages of the production chain for electricity, natural gas, LPG, and fuels in Truvant’s fleet;

E1-6

Significant greenhouse gas emissions in Scope 3 MgCO₂e according to the market-based method

	2024
Total indirect gross greenhouse gas emissions in Scope 3, including:	92,700
1 Purchased goods and services	47,611
2 Capital goods	129
3 Fuel and energy-related activities (not included in Scope 1 or 2)	211
4 Upstream transportation and distribution	13,787
5 Waste generated in operations	86
6 Business travel	66
7 Employee commuting	2,383
9 Downstream transportation and distribution	14,355
12 End-of-life treatment of sold products	14,072

- **Category 4:** Upstream transport and distribution – emissions resulting from the transport of raw materials and materials to Truvant;
- **Category 5:** Waste generated in operations – emissions resulting from wastewater production, disposal of waste generated during the packaging process, and municipal waste;
- **Category 6:** Business travel – emissions resulting from business travel, including air and land transport, fuel consumption, accommodation, and meals;
- **Category 7:** Employee commuting – emissions resulting from the transport of production and office employees;
- **Category 9:** Downstream transport and distribution – emissions resulting from the transport of finished products to customers;
- **Category 12:** End-of-life treatment of sold products – emissions resulting from the disposal and processing of products (packaging) resold by Truvant after their life cycle.



Scope 3 emissions in 2024 increased by 8% compared to 2023.⁴

The largest share of the company’s carbon footprint for 2024 is Category 1 of Scope 3 related to the purchase of goods and services, which accounts for 51% of the company’s total emissions. The next major contributors to Truvant’s carbon footprint are categories related to the transport of goods and materials to the company and the finished product to the customer, i.e., Category 4 and Category 9 of Scope 3, which constitute 30% of the company’s total greenhouse gas emissions. Also contributing significantly to the company’s carbon footprint is Scope 3 Category 12, related to the handling of sold products (packaging) after their life cycle, which accounts for 15% of total emissions.

No significant events or changes in circumstances were noted between the reporting dates of entities in the value chain and the date of Truvant’s financial report that would be material from the perspective of GHG emissions.

Biogenic CO₂ emissions from biomass combustion or biodegradation are:

- not included in Scope 1: 4 MgCO₂e;
- not included in Scope 2: 77 MgCO₂e;
- not included in Scope 3 in the value chain: 91 MgCO₂e.

Total emissions from Scope 1, 2, and 3 in 2024 amounted to 97,250 MgCO₂e using location-based method and were 24% higher compared to 2023. According to market-based method, total emissions in 2024 in Scope 1, 2, and 3 amounted to 93,674 MgCO₂e and were 26% higher compared to 2023. The increase in total emissions in 2024 is mainly due to Category 12 of Scope 3, which was not included in previous years.

The correctness of Truvant’s greenhouse gas emissions calculations was verified by an independent auditor. The attestation statement of the carbon footprint calculation is attached as Appendix to the report.

⁴ The comparison does not include Category 12, which has been incorporated for the first time in the carbon footprint calculation for the year 2024

Resource Use and Circular Economy

ESRS E5

Truvant, as a leader in the packaging industry and a significant element of global FMCG sector value chains, treats responsible resource management and the implementation of circular economy (CE) principles as one of the fundamental aspects of its operations. At the same time, the company is aware that although its actions to minimize waste and increase material efficiency are significant, its impact on the full implementation of CE principles in global value chains remains limited. Therefore, Truvant focuses on supporting customers in achieving their goals in this area and providing packaging solutions that minimize environmental impact whenever possible.

Impacts, Risks, and Opportunities

SBM-3, IRO-1

In the materiality assessment conducted, the company identified significant impacts, risks, and opportunities related to resource use and CE.

Impacts

Truvant's operations are associated with indirect negative environmental impacts related to the production of packaging materials, primarily plastic and paper. Their acquisition and processing by suppliers involve the exploitation of natural resources. In situations where

Truvant can influence the design of packaging for customers, actions are taken to minimize material use by reducing packaging sizes, eliminating unnecessary elements, or replacing them with solutions with lower environmental impact. Additionally, the company is gradually increasing the share of recycled raw materials in the materials used in the packaging process.

Truvant also exerts environmental impact related to waste generation, which occurs at two stages of the value chain. The first stage includes the company's own operations – waste is generated during packaging, storage, and transportation processes. The

second area concerns downstream, i.e., the use of products by end-users and subsequent disposal of packaging. In this case, Truvant has no control over waste management practices. To reduce indirect environmental impact at this stage, the company collaborates with customers in designing packaging solutions that reduce waste and increase the share of easily recyclable raw materials.

The company has not identified communities that would be significantly impacted by resource use and CE in both its own operations and through the value chain.

Risks

Limited availability of raw materials and rising costs of packaging materials pose significant risks for Truvant. Increased competition for limited resources, supply chain instability, and fluctuations in raw material prices can affect the timeliness of order fulfillment and necessitate higher expenditures. This risk may also translate into higher service prices and potential reduction in the competitiveness of the company's offerings.

Opportunities

Investments in solutions and technologies enabling the reuse of raw materials and waste reduction can contribute to lowering operational costs and increasing material efficiency. Implementing CE principles helps build long-term resilience to fluctuations in raw material prices and availability, and can also provide a competitive advantage. Additionally, meeting growing customer expectations in this area opens new business opportunities, potentially strengthening market position and increasing revenues.



Management Approach

E5-1, E5-2

ESG Policy

Resource use and CE are areas addressed by Truvant's ESG Policy. The company commits to improving its waste management system by ensuring proper disposal and striving to increase recycling levels where possible. Truvant also declares optimization of resource use – designing processes to minimize material losses and reduce the amount of generated waste.

A detailed description of the ESG Policy is presented in the *Management Approach* section of the Climate Change chapter.

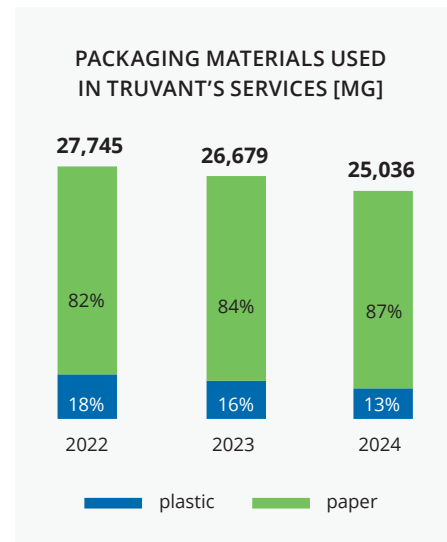
Truvant continuously monitors the level of waste generated and implements actions aimed at reducing its amount and increasing the share of waste directed to recycling.

The Packaging Development Team plays a crucial role in achieving ESG policy goals, considering CE principles at the design stage while responding to customer needs for quality, functionality, and packaging safety. Key performance indicators in this area include:

- Plastic material consumption in packaging processes (tons);
- Share of recycled plastic in total plastic used (%);
- Paper material consumption in packaging processes (tons);
- Share of recycled paper in total paper used (%).

Actions Taken in Relation to Resource Use

To reduce the negative environmental impact resulting from resource and raw material use, Truvant collaborates with customers in eco-designing packaging. Joint actions focus on reducing packaging weight and increasing the share of renewable resources in the materials used. Truvant implements solutions based on sustainable paper raw materials, allowing for the gradual replacement of plastics and reducing the amount of waste generated from them. As a result of actions taken by the company along with its customers, the share of paper in materials used in Truvant's packaging processes increased by 5 percentage points from 82% to 87% between 2022 and 2024.



In 2024, the company also undertook several other actions aimed at reducing resource use, improving material efficiency, and reducing waste generation, such as:

- Eliminating inserts in shelf-ready packaging – removing automatically placed paper inserts in packaging reduced paper consumption by 52.04 tons annually.
- Eliminating 50% of cardboard separators on pallets – removing every second pallet separator reduced cardboard consumption by nearly 500 tons.
- Eliminating bleaching inside shelf-ready packaging – replacing white internal packaging material with brown paper and using uncoated paper instead of coated paper with lacquer. This change eliminated nearly 7 million pieces of coated paper.
- Reducing the size of trays used in Big Packs (large packaging) – reducing the size of paper trays made from recycled pulp reduced material mass by 30%.
- Optimizing e-commerce packaging – the company implemented a project that achieved benefits in both standardizing packaging construction and reducing its weight. As a result, paper consumption was reduced by over 6 tons compared to the previous year.

Resource Inflows and Outflows

E5-4, E5-5

Significant material flows occur within Truvant's business model and operations. These primarily involve packaging materials introduced into the company's facilities, then used in packaging services and discharged as finished packaging for customer products. These flows are an integral part of operational activities related to contract packaging services.

Resource Inflows

Resources introduced into the organization depend on customer order volumes and production volumes. As part of the services offered to customers, the company packages customer products in primary and collective packaging and then ships the packaged finished products to customer distribution centers. For this purpose, the company purchases packaging materials from suppliers, which are used in manual or technology-assisted packaging processes to create the final product packaging. Ultimately, the product reaches the end-user.

Significant resources introduced to Truvant include primarily paper packaging materials such as cartons, leaflets, instructions, and labels, and plastic packaging materials such as PET film, blister film, stretch film, and labels. Additionally, other technical materials such as adhesives, inks, tapes used in the packaging process, and pallets for transporting packaged products are introduced.



E5-4

Resource inflows	Unit	2024
Total weight of products introduced into the organization	Mg	0
Paper packaging materials	Mg	23,051
Plastic packaging materials	Mg	3,442
Other packaging materials	Mg	607
Total weight of technical materials inflows*	Mg	27,100
including the total weight of reused components, reused semi-finished products, and recycled raw materials used to produce company products and services (including packaging)	Mg	18,969
Total weight of biological materials inflows	Mg	0
Total weight of products, technical materials, and biological materials	Mg	27,100
Percentage value of reused materials	%	70%

* Information comes from the ERP system and includes purchases of individual types of materials.

Resource Outflows

Resources discharged primarily include packaging used to package Truvant's customer products. In most cases, these packages can be recycled, provided they are properly sorted and prepared. However, the

company cannot precisely determine what percentage of packaging leaving its facilities is suitable for recycling, considering technological and economic factors of the markets where packaged products are sent.

E5-5

Resource outflows	Unit	2024
Plastic products	Mg	3,358
Paper products	Mg	21,678
Total mass of products*	Mg	25,036
Recyclable material content in products	%	-

*Products include only packaging used for the packaging service, including collective packaging.



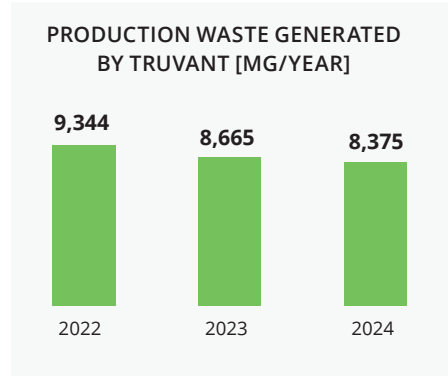
Waste

E5-3, E5-5

Truvant’s operational activities generate waste, which occurs both at the input stage, such as packaging materials used to secure products during transport for service provision, and during the packaging process itself. The main waste streams of the company align with typical sector waste. These include paper, plastics, and wood. Hazardous waste includes containers for solvents and lubricants used for machine maintenance.

All actions of the company in the area of waste management are conducted in accordance with applicable laws and the waste management hierarchy. Truvant strives to minimize waste, for example, by using reusable packaging in which products intended for packaging are delivered. In collaboration with local suppliers, the company reuses packaging materials such as pallets and separators, eliminating those that are not necessary. Label backings are also sorted and sent for reuse.

The company continuously aims to generate as little production waste as possible – the amount of waste generated by Truvant has been decreasing since 2022.



Truvant’s goal in 2024 was to reduce the amount of production waste generated by 4% compared to 2023. In terms of production volume⁵, the company reduced the amount of production waste generated by 7.2% compared to 2023.

All production waste generated by the company is sorted and primarily directed to recycling – in 2024, this was over 90%. The remaining production waste is sent for incineration (mainly with energy recovery), and none of it goes to landfills. Employees are regularly trained on proper waste sorting practices.



Since 2022, the company has been monitoring the level of production waste recycling and striving to increase it. The company includes the mass of waste whose recycling has been confirmed by the recipient (e.g., by statement or DPR – Recycling Confirmation Document) in the recycling level. Truvant’s goal for 2024 was to increase the level of production waste recycling by 4 percentage points compared to the 2023 level. This goal was exceeded, and the company’s recycling level in 2024 increased by 6 percentage points compared to 2023.



Due to market dynamics and economic conditions, as well as constantly changing legal requirements, the company does not set long-term goals in the area of reducing negative environmental impact. Truvant sets operational goals on an annual basis. By 2025, the company has defined two operational goals related to production waste.

Operational goal related to waste	Scope of goal	Measure	2022	2023	2024
Reduction of waste generated in 2025 by 1% (compared to 2024)	Own Operations	Amount of waste generated (Mg)	9,344	8,665	8,375
		Amount of waste generated per produced pallet (kg)	12.50	12.96	12.03
Increase the amount of waste sent for recycling in 2025 by 2 percentage points (compared to 2024)	Own Operations	Percentage of waste generated recycled (%)	48%	66%	72%

⁵ Amount of waste generated per produced pallet.

Due to the specifics of the industry, some waste generated by Truvant cannot be reused. Truvant closely collaborates with waste collection companies, jointly seeking the best solutions for waste management.

E5-5

Total amount of waste from own operations by disposal method	Unit	2024
Waste directed to recovery	Mg	7,606
Hazardous waste	Mg	0
Preparation for reuse	Mg	0
Recycling	Mg	0
Other recovery processes	Mg	0
Non-hazardous waste	Mg	7,606
Preparation for reuse	Mg	0
Recycling	Mg	7,583
Other recovery processes	Mg	23
Waste directed to disposal	Mg	769
Hazardous waste	Mg	13
Incineration	Mg	13
Landfilling	Mg	0
Other disposal processes	Mg	0
Non-hazardous waste	Mg	756
Incineration	Mg	756
Landfilling	Mg	0
Other disposal processes	Mg	0
Total hazardous waste	Mg	13
Total non-hazardous waste	Mg	8,362
Total radioactive waste	Mg	0
Total waste generated	Mg	8,375

Total waste transferred for recycling*	Mg	7,583
Percentage value of waste transferred for recycling	%	91%
Total waste recycled*	Mg	6,064
Percentage of waste recycled	%	72%

* The waste transferred for recycling includes the mass of waste handed over to recipients for recycling (based on waste transfer cards in BDO). The waste recycled includes the mass of waste that was actually processed in recycling processes (based on statements or DPRs)



EU Taxonomy

Truvariant discloses in this report information regarding eligibility with the so-called EU Taxonomy for environmentally sustainable activities. The obligations related to this were introduced by Regulation (EU) 2020/852 of the European Parliament and Council of June 18, 2020, on establishing a framework to facilitate sustainable investments. Truvariant's disclosure is voluntary, carried out in advance of the period when these obligations will apply to the company in the future. The mentioned Regulation, abbreviated as the EU Taxonomy, transposes the EU's climate and environmental goals into technical criteria for assessing whether an activity can be considered sustainable concerning six environmental objectives:

- Climate change mitigation,
- Climate change adaptation,
- Sustainable use and protection of water and marine resources,
- Transition to a circular economy,
- Pollution prevention and control,
- Protection and restoration of biodiversity and ecosystems.



The Taxonomy is thus a classification system that allows examining and disclosing the extent to which Truvariant's activities are environmentally sustainable.

Within the Taxonomy, any activity conducted by Truvariant can be assigned to one of three categories:

- **Category 1** – non-eligible activities for which there are no Technical Screening Criteria (TSC).
- **Category 2** – eligible activities for which the Technical Screening Criteria have not been assessed or found that at least one criterion is not met, or the Minimum Safeguards are not met.
- **Category 3** – eligible activities for which the Technical Screening Criteria and Minimum Safeguards are met – these are environmentally sustainable activities.

For this year's report, Truvariant discloses voluntarily, in a limited scope - the compliance analysis with TSC has not been conducted. Therefore, the disclosure includes only non-eligible activities (Category 1) and eligible activities for which the compliance with TSC has not been assessed (Category 2). At the same time, the company conducted an analysis of compliance with the Minimum Safeguards, the results of which are presented in the following section.



Eligible Activities for Taxonomy

Truvant's activities eligible for the EU Taxonomy were included by calculating the percentage share in three financial categories: turnover, capital expenditures (CapEx), and operating expenses (OpEx).

The basis for turnover calculation was the total sales revenue reported in the company's financial statement. For CapEx, the reference value was the sum of expenditures incurred for the acquisition of tangible fixed assets and intangible assets, as reported in the financial statement. Regarding OpEx, the basis for calculations was the costs incurred for the ongoing maintenance of fixed assets used in the company's operational activities. Specifically, it included:

- Expenditures on repairs and maintenance work in buildings;
- Costs of ongoing maintenance of the vehicle fleet.

The study determined the following percentage of turnover, CapEx, and OpEx eligible for the Taxonomy.

	Turnover	CapEx	OpEx
Value in 2024 [thousand PLN]	1,205,043	4,967	20,097
Eligible activities [thousand PLN]	0	510	90
Share of eligible activities	0%	10.2%	0.4%
Share of non-eligible activities	100%	89.8%	99.6%

The analysis showed that:

- Truvant's turnover does not qualify for the Taxonomy.
- 10.2% of the company's CapEx qualifies for the Taxonomy - this is related to expenditures on CCM 6.5 Transport by motorcycles, passenger cars, and light commercial vehicles.
- 0.4% of the company's OpEx qualifies for the Taxonomy. This includes expenditures related to:
 - CCM 7.3 *Installation, maintenance, and repair of energy efficiency equipment* – 86.3 thousand PLN (0.4%);
 - CCM 7.5 *Installation, maintenance, and repair of instruments and devices for measuring, regulating, and controlling the energy performance of buildings* – 3.9 thousand PLN (less than 0.1%).

Compliance with Minimum Safeguards

Truvant conducted a compliance study with the Minimum Safeguards. It was carried out in accordance with the recommendations in the *Final Report on Minimum Safeguards* by the Platform On Sustainable Finance. According to the recommendations, non-compliance with the Minimum Safeguards is one of four conditions:

1. Inadequate or non-existent due diligence processes regarding human rights, including labor rights, corruption, taxation, and fair competition.
2. The company was ultimately held accountable or found to be violating labor or human rights in certain types of labor or human rights court cases.
3. Lack of cooperation with the OECD National Contact Point (NCP OECD) regarding a complaint accepted by the NCP OECD.
4. The Business and Human Rights Resource Centre (BHRRC) raised an allegation against the company, and the company did not respond within 3 months.

In the verification process at Truvant, non-compliance with the above conditions was examined as follows:



- **Condition 1:** Verification of the completeness of due diligence processes was based on internal verification of the existence and operation of elements of the due diligence process resulting from the frameworks of these processes contained in the documents mentioned in the definition of Minimum Safeguards. The shape of due diligence processes in the definitional approach proposed in Article 3(c) of Regulation (EU) 2020/852 is primarily influenced by the provisions of *the UN Guiding Principles on Business and Human Rights* and the *OECD Guidelines for Multinational Enterprises*. Compliance verification was carried out using a compliance assessment tool utilizing the assessment methodology proposed by the Platform on Sustainable Finance: *World Benchmark Alliance Core UNGP indicators*. The analysis identified gaps and developed recommendations for due diligence processes. These recommendations were fully implemented, meeting the criteria of the guidelines.

- **Condition 2:** The second condition was verified in the process of supplementing the response to condition 1 by checking whether, in relation to the persons mentioned in the content of the condition, no final judgments were issued during the verification period. The verification found no information qualifying Truvant to meet the criteria of condition 2.
- **Condition 3:** Verification of the [OECD NCP complaint database](#) showed no complaints against Truvant during the verification period.
- **Condition 4:** Verification of the [Business and Human Rights Resource Centre \(BHRRC\) complaint database](#) showed no complaints against the company during the verification period.

As a result of the process, it was determined that Truvant's activities are conducted in accordance with the Minimum Safeguards.



3

SOCIAL

Own Workforce

ESRS S1

The most important capital of Truvant is people. Most of the company's employees are employed under an employment contract, but Truvant also cooperates with temporary employment agencies and operates based on civil law contracts. Regardless of the form of employment, the company ensures that every person feels part of one team, functioning in a friendly and safe work environment.

Impacts, Risks, and Opportunities

SBM-3

As part of the materiality assessment, Truvant identified significant impacts, risks, and opportunities related to its own workforce. These primarily concern employment stability, professional development, workplace safety, and respect for rights and diversity.

Impact

Truvant does not identify any significant negative impact on employees of a general or systemic nature. However, production positions involve accident risks. The company conducts occupational risk assessments, provides

mandatory health and safety training, and reminds employees of safety rules during meetings and briefings.

Monotony of work and shift systems, including night shifts, can potentially

negatively impact production employees, affecting their well-being, satisfaction levels, and engagement. Long-term exposure to these factors can lead to decreased motivation and risk of burnout.



The company's positive impact on its own workforce includes stable employment, especially for people with disabilities and those in refugee crises. Truvant supports their professional development and social integration.

The company promotes a healthy lifestyle through campaigns, sports events, and health education, positively impacting employee well-being.

Risks

High turnover and labor shortages pose a risk to Truvant, potentially leading to loss of competencies, increased recruitment and training costs, and disruptions in business processes. Lack of required competencies can increase the risk of operational errors, and rising employment costs affect profitability. Effective human capital management is crucial in mitigating these threats.

Occupational health and safety risks, particularly in production facilities, can lead to accidents, especially among employees with disabilities. The company minimizes this risk by adapting the work environment, providing numerous health and safety training sessions, conducting

educational activities among employees („Safety Days“), and implementing visual communication systems.

Opportunities

Ensuring equal opportunities for all employees and building a positive organizational culture fosters greater engagement and team satisfaction, translating into higher productivity and employment stability. A strong employer brand increases the company's attractiveness in the labor market, attracting experienced and talented specialists.

By engaging employees in process optimization, Truvant can implement improvements that lead to cost minimization and increased operational efficiency. Investing in human capital and effectively managing resources are key factors for the company's long-term financial growth.

Employment Characteristics

S1-6, S1-7, S1-9

At the end of 2024, Truvant employed 2,347 people under employment contracts, with a predominance of women in the employment structure. The vast majority of people are employed under indefinite-term employment contracts.

Most of the company's employees are aged between 30 and 50 years old, constituting the largest group in the employment structure. A significant percentage also consists of employees over the age of 50.

S1-6, S1-9

Characteristics of entity employees and diversity metrics

Employees breakdown by type of contract and by gender in 2024	Women	Men	Total
Number of people employed on indefinite-term employment contracts	1,264	738	2,002
Number of people employed on fixed-term employment contracts	224	121	345
Number of people employed on full-time employment contracts	1,459	842	2,301
Number of people employed on part-time employment contracts	29	17	46
Total number of people employed on employment contracts	1,488	859	2,347

Employees breakdown by level of employment and by gender in 2024	Women	Men	Total
Senior management	7	6	13
Managers and supervisors	29	32	61
Other employees on employment contracts	1,452	821	2,273
Total employees in all categories	1,488	859	2,347



In addition to employees on employment contracts, Truvant also cooperates with individuals working under civil law contracts and temporary employment agencies. In 2024, a total of 1,511 people worked for the company in this way.

During the year, 365 employees left the company under an employment contract, resulting in a turnover rate of 15.6%. Despite the typical dynamics of employment in the sector, Truvant maintains a stable workforce structure by adjusting resources to operational needs. In total, in 2024, the company provided work for 3,858 people.

Number of employees breakdown by age group and by gender in 2024	Women	Men	Total
Total number of people, including age group:	1,488	859	2,347
over 50 years old	486	128	614
30-50 years old	760	509	1,269
under 30 years old	242	222	464

S1-7

Characteristics of non-employees in the workforce

Number of non-employees cooperating with entity - breakdown by type of contract	Total
Number of people working under civil law contracts (mandate contracts, specific-task contracts, and managerial contracts)	12
Number of people working under cooperation agreements (B2B)	0
Number of people providing work under temporary employment agency agreements*	1,499
Total number of people cooperating with the entity under contracts other than employment contracts	1,511

* Calculated based on FTE, FTE equals 168 hours worked in a month.



Employee Engagement

SBM-2, S1-2, S1-4

Truvant conducts regular consultations with employees and their representatives to consider their opinions, needs, and expectations in its approach, strategic goals, policies, and actions taken. Open dialogue and ongoing collection and analysis of opinions form the foundation for building engagement and a positive work environment. The Vice President for ESG and HR Europe is responsible for overseeing the effectiveness of this process at Truvant.

As part of these activities, the company also takes steps to gain insights into the perspectives of all employee groups, including those particularly vulnerable to marginalization such as women, migrants, or people with disabilities. Tools and solutions used in cooperation with its own workforce include:

- **Individual conversations** – employees can openly express opinions and make suggestions about the company to their supervisors and HR department;
- **Stay interviews** – analysis of factors influencing the decision to stay at Truvant;
- **Exit interviews** – identification of reasons for employee departures and actions to improve working conditions;
- **Focus groups** – discussions on key organizational changes; gathering employee opinions related to job satisfaction;
- **360° feedback** – employee evaluation from various perspectives supporting strategic and operational decision-making;
- **Monitoring media and intranet** – analysis of opinions and communication about organizational changes;
- **Annual performance reviews** – assessment of achievements and working conditions; process improvement;
- **Dialogue with trade unions** – consultation on policies and procedures; participation in social audits;
- **Engagement surveys** – starting a three-year collaboration with a company that will conduct global employee engagement surveys;
- **Thematic surveys** – conducted a survey on communication within the organization in 2024.

The effectiveness of applied solutions is monitored through cyclical analyses of survey results, conversations, and employee evaluations. Employee submissions and opinions are regularly presented to the Vice President for ESG and HR Europe, allowing for effective preventive actions and improving working conditions. Operational

management processes engaging employees is the responsibility of the HR department, which coordinates all activities related to this area. The HR department is also responsible for cooperation with department managers to ensure effective implementation of engaging processes.



Truvant consistently takes actions to improve the well-being and activation of employees, recognizing their key role in implementing the business strategy and building lasting organizational value. In 2024, Truvant undertook several actions in this area, including:

- Charity activities and employee volunteering – participation in charitable actions such as WOŚP, Szlachetna Paczka, support for shelters and foundations;
- Participation in charity runs, including the Health Run in Stryków, Run4Help, and Daj piątką na dzieciaka (Give a Five for a Kid).

Management Approach

S1-1

Truvant actively manages impacts, risks, and opportunities related to its own workforce through appropriate policies and procedures. These include key aspects of labor rights, such as equal treatment, personal safety, and freedom of association. Their goal is not only to ensure compliance with applicable regulations but also to build a stable and transparent work environment that fosters employee development and engagement.

These documents are prepared according to best practices and include processes and control mechanisms to oversee compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

ESG Policy

The ESG Policy defines Truvant's approach to managing human resources and respecting human rights, including labor rights. The company commits to supporting social inclusion by creating jobs for people with disabilities, ensuring equal opportunities for national minorities, eliminating age-related barriers, and guaranteeing equal access to employment and remuneration regardless of gender.

These actions form the foundation of the company's commitment to building a diverse and fair work environment where all employees have equal opportunities for development, and their qualifications

and competencies are the only criteria for evaluation.

A detailed description of the ESG Policy is presented in the *Management Approach* section of the *Climate Change* chapter.

Code of Ethics

The Code of Ethics sets clear standards of conduct that shape a culture of honesty, transparency, and responsibility at Truvant. Its primary goal is to promote values such as honesty, reliability, and respect, as well as to ensure full protection of human rights and labor rights.

The Code unequivocally emphasizes the importance of equal treatment and actively counteracting all forms of discrimination. It guarantees equal employment opportunities and a safe, prejudice-free work environment – regardless of race, religion, gender, sexual orientation, age, citizenship, disability, or other personal characteristics. Truvant does not tolerate violence, threats, or behaviors leading to intimidation or violating the dignity of employees.

The Code of Ethics is strategically important for building a transparent and responsible work environment at Truvant – its implementation and compliance are overseen by the Vice President for ESG and HR Europe and the Vice President for Operations. Every employee is required to familiarize themselves with the content of the Code and confirm their knowledge; it is also publicly available on [Truvant's website](#).

Work Regulations

Truvant's Work Regulations define the organization and order in the workplace, as well as specify the rights and obligations of both Truvant and its employees. Its goal is to ensure the smooth functioning of the work environment and clear rules regarding the performance of duties. The regulations apply to all employees employed under an employment contract, regardless of their position, type of work performed, or working hours.

As a key organizational document, the regulations are strategically important for maintaining transparent rules and high work standards. Similar to the Code of Ethics, the implementation and compliance with the regulations are overseen by the Vice President for ESG and HR Europe and the Vice President for Operations. This document is made available through internal communication channels and provided to each newly hired employee as part of the onboarding process.



Policy Updates

All Truvant policies are subject to regular review and verification for compliance with applicable laws. The documents are systematically updated in collaboration with key stakeholders and subject matter experts, ensuring their relevance, consistency, and compliance with current laws and global guidelines.

In 2024, the ESG Policy was updated, and at the beginning of 2025, the Code of Ethics was updated – the changes aim to standardize the document for the entire global organization. Other documents have been adapted to the requirements of national legislation and identified areas requiring improvement.

Communication

Truvant uses various methods to inform individuals performing work about the policies that concern them, ensuring their availability and understanding at all levels of the organization. Information is communicated through:

- Internal HR Portal platform, providing access to policies and procedures,
- Regular emails informing about policies and their updates,
- TruNews newsletters with current information,
- Information boards and screens placed in common areas,
- Training sessions dedicated to policies and their implementation,
- Employee meetings where key issues are discussed,
- Leaflets with the most important information about policies,
- Regular newsletters,
- Dedicated websites containing detailed information,
- Document management and distribution system.

Policies and communications directed at employees are available in three languages: Polish, English, and Ukrainian. Infographics are also used to facilitate understanding and eliminate communication barriers.

Professional Development

S1-4, S1-5, S1-13

Professional development is one of the key areas of impact for Truvant on its own workforce. The company ensures equal treatment of all employees, offering flexibility in adapting development activities to their individual needs. This commitment is included in Truvant's operational goal.

Operational goal related to professional development	Scope of goal	Measure	2024
Increase in training hours completed by 10% in 2025 vs 2024	Own operations	Total number of training hours, number of training hours per employee	7,736.5 hours; 3.3 training hours per employee



To achieve this goal, the company has expanded its training programs, adapting them to different employee needs:

- **Akademia Trenerów (Trainer Academy)** – internal training conducted by employees, available on the HR Portal platform;



- **TRUVALENT** – development of high-potential employees' competencies through workshops and individual consultations;
- **Leader DNA** – support for the development of leadership skills among managerial staff;
- **Continuous Skills Development (CSD)** – systematic development of operational employees' and line leaders' competencies;
- **Performance Management and Talent Review** – tools for monitoring performance and identifying talent;
- **Truvant Excellence System** – process improvement and employee qualification enhancement.



The company engages employees in development activities, providing them with access to training and development reviews. These activities are carried out within specific organizational frameworks and adapted to the employment structure, considering different position levels.

In 2024, Truvant employees participated in a total of 7,735.5 clock hours of training, including internal and external training.

S1-13

Training and skills development metrics

Average number of training hours per employee in 2024	Women	Men
Senior management	2.86	1.00
Managers and supervisors	14.07	23.36
Other employees on employment contracts	1.71	4.95
Average number of training hours per employee	1.96	5.61

Below is a summary of development and performance reviews. In 2024, a total of 368 were conducted, averaging 0.16 conversations per person. This value is primarily due to the fact that development and performance reviews do not cover employees in production positions, who constitute a significant part of Truivant's workforce.

Total number of development reviews planned and conducted in 2024

Breakdown by level of employment	Planned development reviews		Conducted development reviews	
	Women	Men	Women	Men
Senior management	7	6	7	5
Managers and supervisors	29	32	29	32
Other employees on employment contracts	189	163	150	145
Total number of development reviews	225	201	186	182

Percentage of employees covered by development reviews in 2024

Breakdown by level of employment	Women	Men
Senior management	100%	83%
Managers and supervisors	100%	100%
Other employees on employment contracts	10%	18%
Total percentage of employees covered by development reviews	13%	21%



Truivant also uses various tools to support careers and ensure equal opportunities for promotions, such as:

- HR Portal platform, which includes a talent management module. This tool allows managers to plan promotions and career paths and supports data-driven decision-making;
- Annual professional development needs survey, enabling quick response to changing employee needs;
- Periodic employee evaluations allowing for ongoing adjustment of training programs and career path planning;
- Job description matrix – documentation helping employees plan their career paths;
- Regular talent reviews enabling the identification of high-potential employees and planning their careers.



Diversity and Equal Treatment

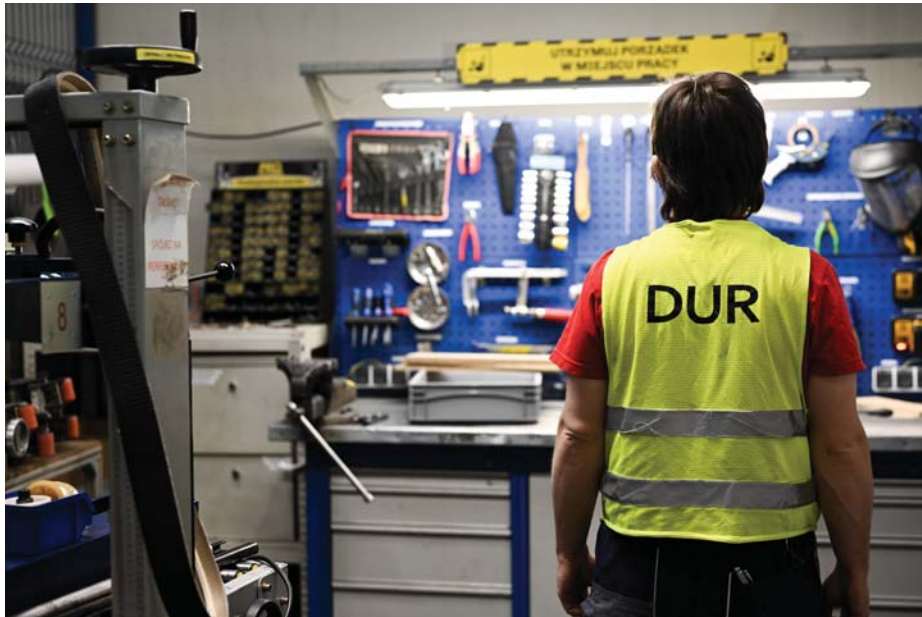
S1-4, S1-5, S1-9, S1-12

Diversity and equal treatment are integral parts of Truvant's corporate values. Truvant pays particular attention to ensuring equal treatment regardless of age, gender, origin, and disability.

People with Disabilities

The professional activation of people with disabilities is an important element of Truvant's approach to diversity and equal treatment. The company has established an operational goal related to this area.

Operational goal related to diversity and equal treatment	Scope of goal	Measure	2022	2023	2024
Maintaining a minimum of 7% employment rate for employees with disabilities	Own operations	Percentage of employees with disabilities in the employment structure	7.0%	7.6%	8.0%



Truvant consistently takes actions to ensure appropriate working conditions for these individuals, support their professional development, and eliminate barriers to professional activity. As a result of these actions, the percentage of employees with disability certificates in Truvant's employment structure is 8% – significantly above the market average.

As part of the No Barriers program established in 2017, initiatives for diversity and inclusion of people with disabilities were undertaken and continued, including:

- Expanding the private medical and rehabilitation care package for employees with disabilities;
- Increasing financial support, including subsidies for treatment costs;
- Organizing training to raise awareness of diversity management „Arm in arm with disability“;
- Continuing cooperation with the Polish Association of the Deaf and the Migam.pl platform, which enabled the organization of training and meetings for deaf and hard-of-hearing individuals, improving communication and integration in the workplace.

These actions support not only employed individuals but also contribute to improving the accessibility of the labor market for people with disabilities, reducing barriers, and promoting good employment practices.

Equal Opportunities in the Labor Market

Truvant strives to ensure equal access to employment, eliminating recruitment barriers for people with disabilities, foreigners, and candidates of different ages. Job requirements are formulated inclusively, considering candidate diversity and using gender-neutral language in job offers, ensuring openness to all professional groups.

Job offers are published on Truvant's website and recruitment portals, along with information about the availability of positions for people with disabilities and candidates of different nationalities. Job descriptions are created jointly by managers and the HR department, ensuring their compliance with actual requirements and precise definition of expected competencies and experience.

Responsibility for equal treatment of candidates and employees lies with the Vice President for ESG and HR Europe, who oversees compliance with policies and procedures in this area. The highest management level is responsible for actions related to recruitment, training, and promotions. Additionally, the company maintains detailed records of recruitment processes, training, and promotions, ensuring transparency of actions and access to information about

development opportunities within the organization.

Recruitment is supported by integrated tools and systems that increase the efficiency and transparency of the process:

- eRecruiter, recruitment management system, enabling monitoring of job offers, tracking recruitment stages, and applications from both internal and external employees;
- Company website – recruitment section providing candidates with access to information about current job offers;
- Internal recruitment announcements, allowing current employees to apply for office positions;
- Employee Referral System – supporting the recommendation of candidates for employment.

Through these tools and transparent recruitment processes, the company promotes equal opportunities, access to development opportunities, and a culture of openness and appreciation of employees.



Working Conditions

S1-4, S1-5, S1-10, S1-11, S1-15, S1-16

Truvant ensures decent and stable remuneration, transparent employment rules, and respect for free time and the right to leave work. None of Truvant's employees receive remuneration below the level of adequate remuneration, defined as equal to or higher than the minimum wage.

Gender Pay Gap

The company has an unadjusted pay gap (gender pay gap), which is the difference in average wages between women and men, calculated without considering factors such as position or professional experience.

Truvant places particular emphasis on managing the impact related to pay equality. To minimize the potential negative impact in this area, an operational goal described in the table has been established.

Operational goal related to	Scope of goal	Measure	Baseline Year 2025
gender pay gap			
Calculate and publish adjusted gender pay gap for 2025	Own operations	Adjusted gender pay gap	-

The following summary contains information about the unadjusted pay gap at Truvant. The pay gap is defined as the difference in the average gross wage level of female and male employees, expressed as a percentage of the average gross wage level of male employees. It was calculated using the following formula:

Unadjusted pay gap = average gross wage: $[(\text{men} - \text{women}) / \text{men}] * 100\%$.

Truvant commits to taking actions to gradually reduce the pay gap within the established goals, striving for greater equality in the wage structure.



S1-16

Detailed Information on the unadjusted gender pay gap in 2024

Gender pay gap	Value
Based on the average gross wage of employees on employment contracts	17.94%
Based on the average hourly gross wage	
	Value
Senior management	-9.93%
Managers and supervisors	10.56%
Other employees on employment contracts	15.76%
Based on the average hourly gross wage + fixed allowances	
	Value
Senior management	-9.93%
Managers and supervisors	11.56%
Other employees on employment contracts	17.01%
Based on the average hourly gross wage + variable allowances	
	Value
Senior management	-16.68%
Managers and supervisors	12.08%
Other employees on employment contracts	13.53%

Social Protection

In terms of social protection, all employees employed under an employment contract are covered by it in accordance with the Polish Labor Law. This also applies to the right to parental leave, which is available to all company employees.

S1-15

Work-life balance metrics

Basic data on maternity, parental, and care leaves in 2024	Women	Men
% of employees on employment contracts entitled to family-related leave out of the total number of employees on employment contracts	100%	100%
% of entitled employees, who took family-related leave	10.22%	5.59%



Health and Safety

S1-1, S1-5, S1-14

Truvant prioritizes health and safety, especially in packaging facilities, where stringent procedures are in place to minimize accident risks and protect employee health. All individuals performing work for the company are covered by the occupational health and safety (OHS) system.

Operational goal related to health and safety	Scope of goal	Measure	2022	2023	2024
Reduction of the number of accidents resulting in lost work time to zero	Own operations	Number of accidents resulting in lost work time	9	14	6
		Work accident rate*	0.93	2.02	0.89

* Total number of accidents x 1,000,000 / Total number of hours worked by own workforce

OHS Policy and Monitoring its Effectiveness

Truvant has implemented an OHS Policy aimed at ensuring a safe and healthy work environment, protecting both employees and individuals on the premises from accident risks. Its principles comply with applicable national regulations and international safety standards, and their implementation is overseen by the Vice President for ESG and HR Europe and the Vice President for Operations.

The policy is implemented at various organizational levels. New employees are introduced to its content during the onboarding process, and ongoing information is communicated through internal channels, cyclical training, and awareness-raising campaigns. Regular educational activities support maintaining high safety standards and building a culture of responsibility in OHS.

Truvant has set an operational goal related to reducing the negative impact on work safety. As part of the strategy and the pillar related to productivity and operational excellence, Truvant aims for zero incidents and 100% safe working hours. The goal covers all operational units of the organization, both production and administrative, as well as employees on employment contracts and those cooperating on other contracts.

In 2024, Truvant recorded 6 work-related accidents, all classified as minor. There were no fatal accidents. This represents an improvement compared to 2023, when 14 accidents were recorded, also classified as minor. The following summaries contain detailed data on work accidents among individuals providing work for Truvant.

S1-14

Health and safety metrics

Work-related injuries with regard to employees

	2024
Minor accidents	4
Serious accidents	0
Fatal accidents	0
Collective accidents	0
Total number of accidents involving employees	4

Work-related injuries with regard to non-employees

	2024
Minor accidents	2
Serious accidents	0
Fatal accidents	0
Collective accidents	0
Total number of accidents involving non-employees	2

Work-related injuries with regard to other workers working on company's premises

	2024
Minor accidents	0
Serious accidents	0
Fatal accidents	0
Collective accidents	0
Total number of accidents involving other workers	0

In 2024, no cases of health deterioration among former employees were recorded that could be related to previous employment with the company and of which the company became aware.

S1-14

Work-related ill health and work days lost

Data with regard to employees	2024
Number of cases of registered occupational diseases	0
Number of days lost due to work accidents	18
Work accident rate*	1.09
Data with regard to non-employees	2024
Number of cases of registered occupational diseases	0
Number of days lost due to work accidents	215
Work accident rate*	0.66

* Number of work accidents / number of hours worked x 1,000,000



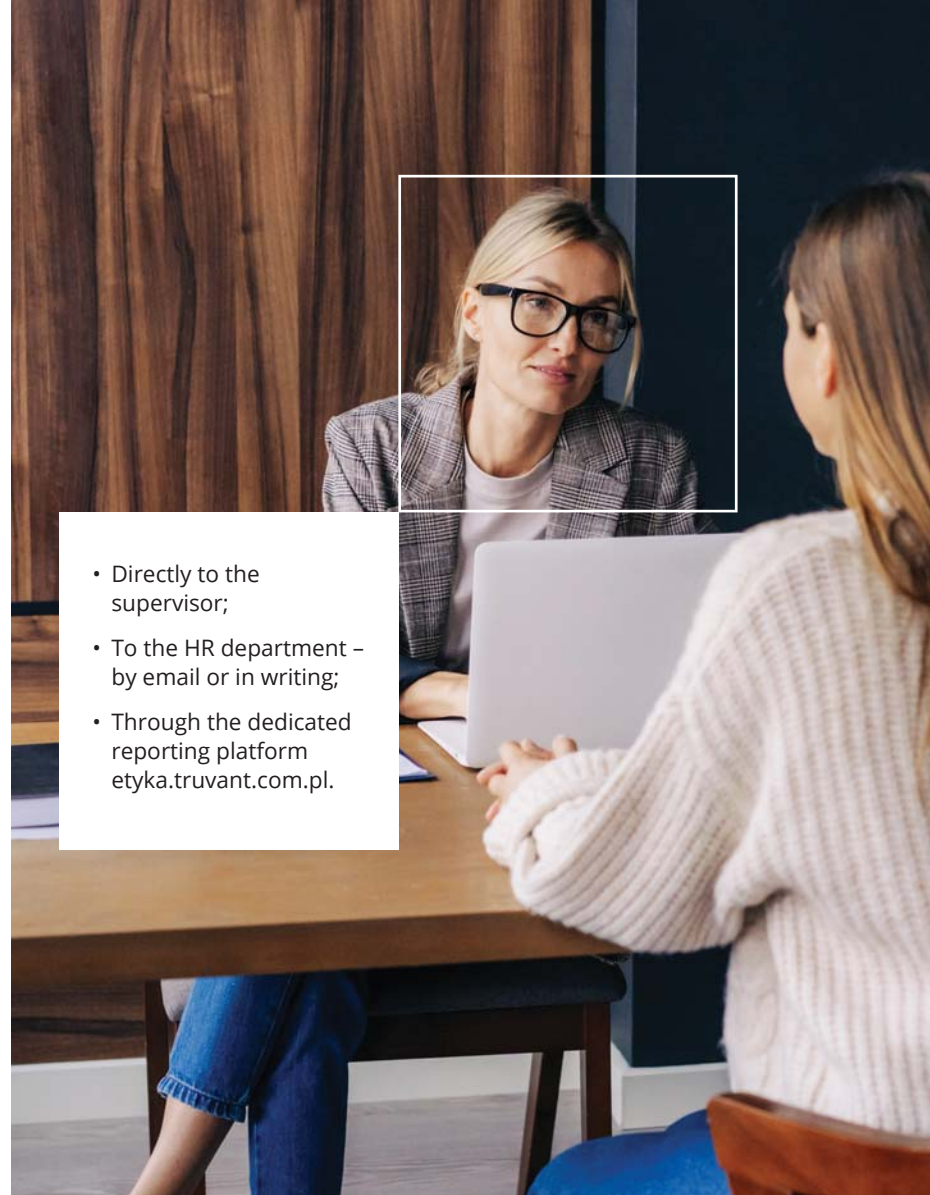
Human Rights and Grievance Mechanism

S1-3, S1-17

Truvant has implemented comprehensive procedures aimed at preventing irregularities and discrimination, mitigating their effects, and taking appropriate actions in case of their detection.

Truvant has a procedure in place, *Procedure for reporting and dealing with irregularities and violations*, which is a key element in ensuring compliance with ethical principles and human rights, including labor rights. Employees, partners, individuals performing work in the value chain, and all other stakeholders of the company have the opportunity to report cases of discrimination and other irregularities – reports can be made anonymously – Truvant declares zero tolerance for retaliatory actions in response to reports. This procedure provides the possibility of reporting violations or concerns through the following channels:

- Directly to the supervisor;
- To the HR department – by email or in writing;
- Through the dedicated reporting platform etyka.truvant.com.pl.



Reports are initially reviewed by the HR department representative responsible for cooperation and care of the given facility or area, and then escalated according to the procedure, depending on the nature of the report and required corrective actions.

The HR department is responsible for monitoring reports and the effectiveness of the complaint reporting mechanisms, continuously analyzing the number of reports, their nature, and the corrective and preventive actions taken, and reporting the results to the Vice President for ESG and HR Europe.

To ensure the availability and safety of using the reporting channels, the company has implemented a number of principles and instruments supporting their effectiveness. These include:

- Protection against retaliatory actions towards individuals reporting irregularities. The procedure includes the possibility of anonymous reporting, sanctions for retaliatory actions, and the possibility of immediate contact with the HR department in case of suspicion.
- Effective communication and training informing employees and individuals performing work about the available reporting channels. Information about the complaint reporting mechanism is communicated through internal channels such as the HR Portal platform, email communication, TruNews newsletters, and information boards and video screens.

- Engagement and support from Truvant's Management Board in both enforcing procedures and overseeing their effectiveness.

- Communication and the reporting system are available in three languages: Polish, English, and Ukrainian, ensuring equal access to the reporting channel for all employees.

In 2024, a total of 15 complaints were received under the procedure. Three of them concerned cases of discrimination and harassment – none of them were confirmed. The remaining 12 complaints concerned violations of work regulations, improper communication between the leader and the team or within the team, the presence of sick individuals in the workplace, and delays in settling financial obligations by the company. In these cases, two complaints were confirmed – appropriate corrective actions were taken in response to resolve the issues and prevent their recurrence in the future. One of these cases concerned the leader's communication and management style, and the corrective action was a remedial plan provided for in the work regulations. The second was an external report of delayed payment caused by a bottleneck in the invoice circulation process. The payment was made, and the invoice circulation process was improved.



Workers in the Value Chain

ESRS S2

Truvariant understands that its responsibility for working conditions extends beyond directly employed workers and includes those employed in the value chain, primarily upstream. This particularly concerns suppliers of raw materials, packaging manufacturers, and transport and logistics companies that the company collaborates with.

Impacts, Risks, and Opportunities

SBM-2, SBM-3

Truvariant has identified significant impacts and risks related to workers in the value chain. These are systemic in nature and stem from the specifics of the industry in which Truvariant operates and key entities in the company's supply chain.

Although Truvariant's relationships with this group of stakeholders are indirect, the company actively manages related impacts and risks through responsible supplier relationships, audit system, and consideration of labor rights in

the selection of business partners. Through these actions, Truvariant strives to ensure the highest ethical standards and promote sustainable practices throughout the supply chain.

Impacts

Work at the company's suppliers, especially in the packaging production and transport sectors, can involve challenges regarding working conditions. The pursuit of greater efficiency can impact safety, making it crucial to manage accident risks and care for the health of workers. In the transport sector, fast-paced work and long hours can affect physical and mental health.

The wage structure in the supplier industries depends on the region and nature of employment, and flexible forms of work and performance-based pay systems can affect workers' financial stability. Therefore, it is essential to provide solutions that support long-term income security. Employment stability in these industries is also influenced by the variability of demand for services and cost factors, prompting companies to use various employment models, such as short-term contracts or outsourcing, which can affect workers' sense of stability.

Risks

Inadequate working conditions, low wages, and excessive working hours in the value chain can generate financial risks for Truvariant related to the continuity and stability of supplies. Such disruptions can increase operational costs and affect the timeliness of order fulfillment.

Additionally, excessive workload and insufficient enforcement of health and safety standards can lead to increased absenteeism and reduced productivity, which in the long term can negatively impact service quality and supply stability.

A significant risk is also the potential impact on Truvariant's reputation. Improper employment practices in the value chain can lead to a loss of trust from business partners and customers, which can consequently weaken the company's competitive position in the market.



Management Approach

S2-1

Truvant has implemented relevant policies aimed to manage impacts and opportunities related to workers in the supply chain effectively.

ESG Policy

The ESG Policy is a key document regulating Truvant's approach to sustainable development, including social responsibility throughout the value chain. It defines the company's strategic commitments, including ensuring safe and dignified working conditions for workers and adhering to the highest ethical standards. These principles directly impact relationships with suppliers and their workers – Truvant collaborates only with entities that share these values.

A detailed description of the ESG Policy is presented in the disclosure in the [Management Approach](#) section of the Climate Change chapter.

Code of Conduct for Suppliers

The Supplier Code of Conduct defines standards for responsible business conduct that apply to all Truvant suppliers. The document obliges compliance with human rights and labor rights and meeting socioethical requirements in accordance with international guidelines, such as:

- OECD Guidelines for Multinational Enterprises;
- UN Guiding Principles on Business and Human Rights;
- Eight core conventions of the International Labour Organization;
- Universal Declaration of Human Rights.

The Code also emphasizes the importance of ethical business practices, including anti-corruption, fair competition, and adherence to financial transparency principles.

The document is provided before the start of cooperation, and all suppliers commit to its compliance through a relevant declaration. Truvant expects partners to implement appropriate internal procedures and conduct training to ensure adherence to its provisions. A particular category in this context is full-service suppliers, who undergo a selection and evaluation process directly by Truvant, unlike suppliers managed by clients. For these suppliers, signing



the Code is mandatory, as Truvant treats compliance with human rights by its selected suppliers as its responsibility and commitment.

Compliance with the Code is regularly monitored, including audits and risk assessments of suppliers. In case of violations, Truvant reserves the right to take corrective actions, including the possibility of terminating cooperation.

Goals and Monitoring Policy Effectiveness

In the beginning of 2025, Truvant launched the global Sustainable Procurement Program, under which tools will be developed and implemented to minimize risks related to working conditions in the value chain. As part of the initiative, the company will also define goals, key performance indicators, and identify potential negative impacts on workers in the value chain.

Respect for the Rights of Workers in the Value Chain

S2-2, S2-3, S2-4

Truvant considers respect for human rights, including labor rights, as the foundation of its operations. Respecting these rights is the basis for building an ethical work environment throughout the value chain.

The company continuously monitors compliance with human rights in the supply chain, using tools such as analysis of supplier self-assessment questionnaire results and audits of payroll documentation and living conditions of migrant workers employed by temporary employment agencies. These actions enable the identification of risk areas and the implementation of effective solutions to strengthen labor rights protection and compliance with adopted policies.

A key element protecting the rights of workers in the value chain is also access to Truvant's complaint reporting mechanism. These individuals can report their concerns, problems, and needs through the reporting platform at etyka.truvant.com.pl.

Through this mechanism, Truvant ensures that all stakeholders, including workers in the value chain, can report any violations in a safe and transparent manner. A detailed description of the grievance mechanism is presented in the [Human Rights and Grievance Mechanism](#) section of the Own Workforce chapter.

Another key aspect of respecting the rights of workers in the value chain is considering their rights in the supplier and business partner selection process. The company particularly focuses on cooperation with local entities, especially from Poland – a country with a relatively low risk of human rights and labor rights violations.

Preferring domestic suppliers not only reduces risks related to compliance with employment standards but also positively impacts local communities.



90%

of supplier we have business relations with are located in Poland

Supporting local businesses promotes job creation, strengthens local economies, and contributes to improving residents' quality of life.



4

GOVERNANCE

Business Conduct

ESRS G1

Truvant adheres to the highest standards of ethics and responsibility, fostering a corporate culture based on integrity, transparency, and principles of fair business conduct. Upholding these values is the foundation of trust in both internal relations and interactions with business partners.

Managing relationships with business partners plays a key role in responsible business conduct – Truvant requires its suppliers to adhere to business ethics principles, ensuring transparency, fairness, and high-quality cooperation.



Impacts, Risks, and Opportunities

IRO-1

Truvant has identified significant impacts, risks, and opportunities related to corporate governance and business conduct. These are systemic in nature and stem from the industry's specifics and key entities in the supply chain.

Impacts

Truvant's practices and actions significantly influence business ethics standards. Transparent and fair cooperation, timely payments, and enforcing high standards in business relationships support suppliers' financial stability, positively affecting employment conditions and work standards. Conversely, ineffective control over ethical compliance or payment delays can lead to lowered work standards and violations of labor rights. Within its own operations, Truvant strengthens stakeholder trust by building a strong corporate culture based on integrity, responsibility, and legal compliance.

Risks

Irregularities in supplier relationships, such as late payments or lack of transparent cooperation principles, can disrupt the value chain, increase operational costs, and result in the loss of key business partners. Additionally, ineffective anti-corruption mechanisms or insufficient whistleblower protection increase the risk of legal sanctions, financial losses, and reputational damage. Consequently, this can weaken Truvant's market position and affect its ability to secure new contracts and maintain existing relationships.

Opportunities

A strong organizational culture based on integrity, transparency, and responsibility provides a competitive advantage and builds trust among business partners and customers. Maintaining high cooperation standards with suppliers and enforcing responsible practices in the value chain can reduce costs, lower operational risks, and increase customer and partner loyalty and trust.



Management Approach

GOV-1, G1-1

The Board oversees business conduct issues, and is responsible for establishing and maintaining ethical standards within the organization. Their duties include defining corporate mission and values and shaping organizational culture through their example. Board members and senior management regularly expand their knowledge in business conduct through internal training, webinars, consultations with legal advisory firms, and workshops conducted by external experts.

The company has implemented several policies and procedures serving as an ethical compass for its operations and daily interactions with employees, customers, suppliers, and business partners. These documents comply with best practices and regulations from the following legal acts:

- Directive (EU) 2019/1937 and the Polish Act of June 14, 2024, on whistleblower protection;
- Directive (EU) 2018/843 and the Polish Act of March 1, 2018, on anti-money laundering and counter-terrorism financing;
- Regulation (EU) 2016/679 and the Polish Act of May 10, 2018, on personal data protection.

Currently, the process of reviewing and standardizing policies is underway to ensure consistency and their global applicability.



Code of Ethics

The Code of Ethics defines the values guiding Truvant and ensures a common understanding of key norms and principles among all employees and business partners. The document covers essential areas of business conduct, such as anti-corruption, protection of company property and copyrights, confidentiality of information, and personal data protection.

A detailed description of the Code is presented in the [Management Approach](#) section of the *Own Workforce* chapter.



Code of Conduct for Suppliers

The Code regulates key areas of business conduct concerning Truvant's suppliers. It includes compliance with laws and regulations, environmental responsibility, ensuring safe and dignified working conditions, and monitoring mechanisms for compliance with the Code. The document applies to all suppliers of materials, machinery, services, and business partners operating within the supply chain.

A detailed description of the Code is presented in the [Management Approach](#) section of the *Workers in the value chain* chapter.



Policy Training

Although the company does not have a formal policy on business conduct ethics training, Truvant regularly conducts training in the following areas:

- Anti-corruption
- Human rights
- Code of Ethics
- Counteracting mobbing and discrimination

The company's goal is to ensure as many employees as possible are trained. In 2022, a series of training sessions were organized for all administrative and production employees, and since then, new hires undergo the training. Additionally, temporary labor workers providing services to Truvant are included in training on the Code of Ethics and the grievance mechanism.

Corporate Culture

G1-1

Corporate culture at Truivant is the foundation for the organization's long-term development and shaping relationships with stakeholders. Its construction, development, and promotion are continuous processes requiring constant monitoring, evaluation, and adaptation to dynamic market conditions and employee expectations. Key areas and values underpinning the company's organizational culture include:

- **Ethics, accountability, and compliance with regulations** – consistent implementation of ethical standards and compliance with legal and internal regulations. Truivant promotes honesty and responsibility in relations with employees, coworkers, customers, suppliers, and competitors.
- **Occupational health and safety** – ensuring conditions conducive to health and safety in the workplace for employees and workers.
- **Diversity and inclusion** – promoting equal opportunities and counteracting all forms of discrimination. Creating an open, inclusive work environment that respects cultural, gender, and age diversity.
- **Innovation** – encouraging employees to actively propose improvements, collaborate on optimization projects, and exchange experience on improving efficiency.
- **Sustainable development** – actively engaging in pro-environmental activities and implementing initiatives in the area of sustainable development.



The company regularly analyzes the effectiveness of its organizational culture through satisfaction surveys, internal audits, and strategy reviews. Each of these areas is evaluated by the Board during quarterly meetings and annual strategy reviews, allowing for effective adaptation of actions to current needs.



Development and Promotion of Corporate Culture

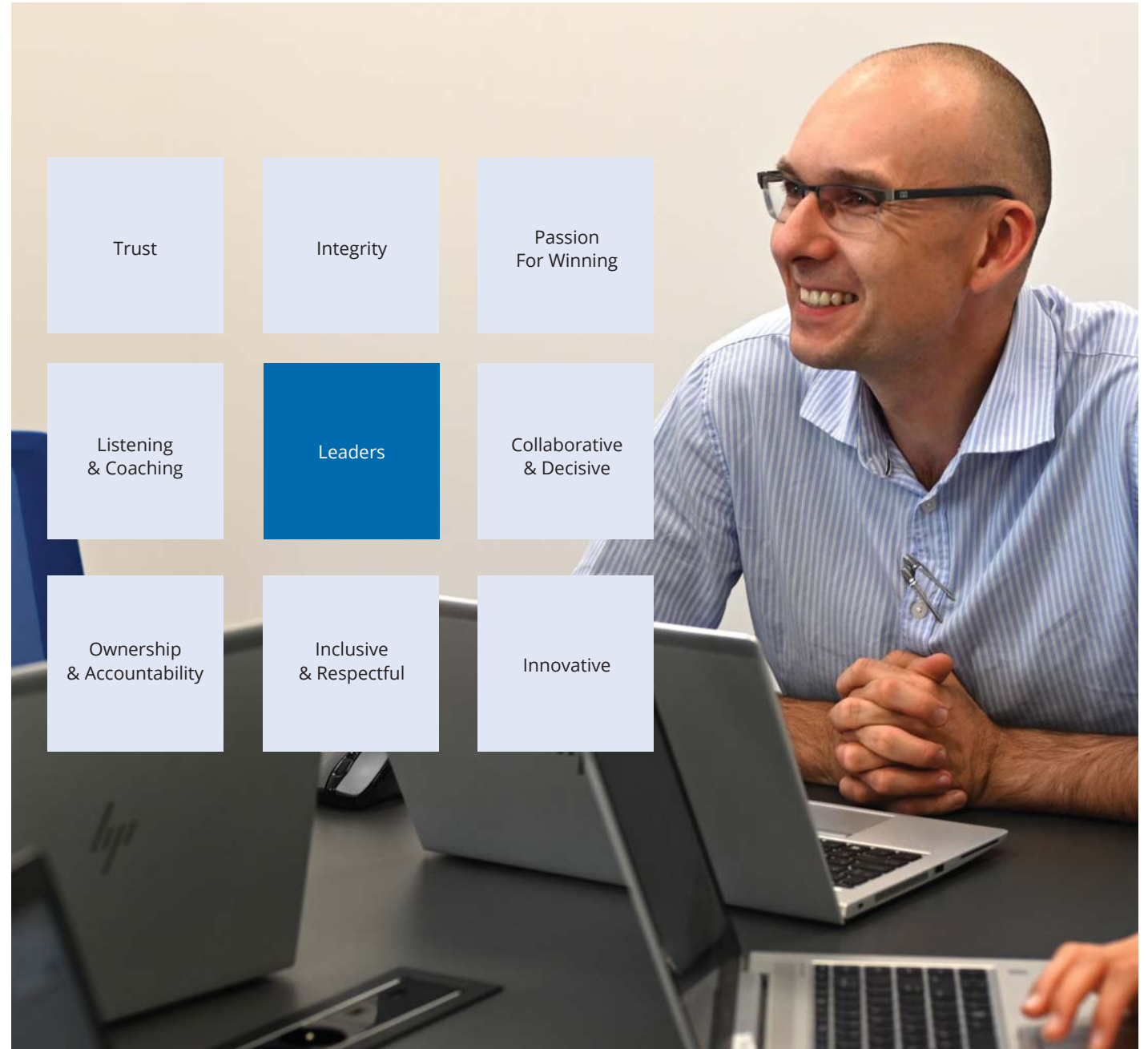
TruVant consistently strives to promote and develop its organizational culture. To this end, it implements solutions that include:

- **Training programs** – covering ethics, regulatory compliance, occupational health and safety, and pro-environmental activities.
- **Reward and recognition systems** – motivating employees to initiate valuable projects.
- **Surveys and feedback mechanisms** – allowing for the assessment of action effectiveness and implementation of necessary improvements.

Leaders play a key role in this area at TruVant, setting the tone for the organization and shaping its values in daily practice. Their tasks include:

- **Leading by example** – adhering to ethical principles and implementing company values in daily decisions.
- **Communicating key values** – ensuring transparency and building trust through regular team meetings.
- **Initiating training and workshops** – developing employee awareness in ethics, compliance, and organizational values.
- **Implementing and enforcing policies** – ensuring consistency with adopted standards, such as the Code of Ethics.
- **Building trust and transparent communication** – promoting honesty and consistency in actions.
- **Goal orientation and innovation** – supporting collaboration and responsible decision-making.
- **Respect and promotion of an inclusive work environment** – acting in the spirit of equality and diversity.
- **Entrepreneurial approach** – taking initiative and supporting employee development through coaching and mentoring.

Through these actions, leaders not only strengthen the organizational culture based on values and ethics but also create a work environment conducive to engagement, development, and long-term company success.





Counteracting Corruption and Bribery

G1-3, G1-4

Counteracting corruption and bribery are pillars of the company's ethical functioning, fitting into a broader approach to responsible business conduct and building trust in stakeholder relationships. The company consistently applies a zero-tolerance policy towards corruption, implementing mechanisms and procedures supporting honesty, transparency, and compliance with ethical standards. The effectiveness of these actions is confirmed by the lack of confirmed incidents of corruption or bribery in 2024.

Anti-Corruption Policy

Truvant's Anti-Corruption Policy was implemented in 2022, forming the foundation for honest and transparent business conduct. The policy is based on zero tolerance principle, establishing clear rules for avoiding conflicts of interest, receiving and giving gifts, and reporting violations. It covers all employees, coworkers, managers, directors, and entities acting on behalf of Truvant.

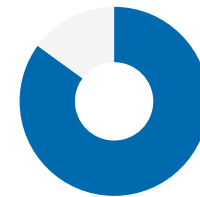
The Board is responsible for implementing the Policy, overseeing the entire process. The Policy is available in Truvant's organizational document management system, ensuring easy access for all employees and interested parties.

Anti-Corruption Training

As part of the Anti-Corruption Policy implementation, Truvant organizes training covering both theoretical and practical aspects of preventing corruption and bribery. Topics include:

- Identifying corruption and bribery risks;
- Preventing conflicts of interest;
- Rules for receiving and giving gifts;
- Recognizing unethical behavior;
- Procedure for reporting corruption.

Training is conducted online and is aimed at all Truvant employees, regardless of position.



By the end of 2024,

85.1%

of employees completed anti-corruption training, which is a significant indicator of Truvant's commitment to promoting honesty and an ethical work environment.

During the analyzed period, no departments or positions with increased corruption risk were identified. An analysis of this issue will be conducted at a global level in 2025.

Corruption Reporting Procedure

Every employee and coworker can report cases of corruption and bribery through Truvant's grievance mechanism, described in the *Human Rights and Grievance Mechanism* section of the *Own Workforce* chapter. Corruption cases can be reported via the ethics reporting platform at etyka.truvant.com.pl.

Individuals conducting investigations into corruption and bribery cases are independent of the management structures involved in the matter, ensuring objectivity and impartiality of the process. Investigations are carried out by HR department employees who do not have direct working relationships with the persons under investigation with support of external legal advisory when needed.



Business Relations with Suppliers

G1-2, G1-6

Managing supplier relationships is a key area of Truvant's operations, directly impacting the creation of a sustainable value chain, building long-term value, and ensuring operational continuity. The company places great importance on carefully selecting business partners, treating supplier selection criteria as a crucial element in mitigating risks and potential negative impacts. Although Truvant has not implemented a formal procurement policy, the company is actively working to integrate social and environmental factors into supplier selection through its ongoing Sustainable Procurement program.

Social and Environmental Criteria in Supplier Selection

The supplier relationship management model reflects Truvant's business model and operational specifics. For services provided to clients, some suppliers are directly indicated by them, limiting Truvant's influence over the assessment and qualification of these partners. In such cases, the company's responsibility focuses on technical aspects of cooperation, such as logistics, oversight of supplied products quality and payment processing, while the selection and evaluation of the supplier lie with the client.

In areas where Truvant has full decision-making authority over supplier selection, the company places particular emphasis on the qualification, selection, and risk

management process. In the qualification and selection process for both direct (production-related) and indirect (non-production-related) suppliers, Truvant sets high standards for material and raw material quality, timely order fulfillment, and adherence to business conduct and environmental standards.

At the beginning of each qualification process, suppliers are provided with the Supplier Code of Conduct. Indirect suppliers are required to complete a dedicated self-assessment questionnaire, covering information on implemented sustainability policies, environmental and social actions, human rights compliance, and working conditions monitoring. The self-assessment results are an integral part of the supplier evaluation and directly influence the decision to initiate or continue cooperation.

For critical direct suppliers, the prerequisite for starting cooperation is signing the Supplier Code of Conduct and completing a form that includes questions about environmental aspects, workplace safety, human rights respect, and corporate governance. Social and environmental criteria are a significant part of the qualification process and are considered in purchasing decisions.

Monitoring Supplier Cooperation

After selecting a supplier, Truvant regularly monitors the effectiveness of cooperation, with particular attention to compliance with the Code and adopted standards. During cyclical meetings, suppliers are informed about the company's current requirements and expectations, enabling ongoing progress tracking and engagement level verification.

In 2023 Truvant conducted a self-assessment process among business partners using a questionnaire covering sustainability policy, workplace safety, and human rights issues. Special attention was given to temporary labor agencies, which, due to the nature of their activities, may pose a higher risk of labor rights violations.

Additionally, employees responsible for supply chain management are regularly trained in building supplier relationships, conducting effective dialogue, and evaluating cooperation quality, considering environmental and social aspects. These trainings support the development of competencies in negotiation, risk assessment, and

monitoring supplier engagement in sustainability areas. As part of the incentive system, achieving goals in quality, cost efficiency, and sustainability is also an element of the annual evaluation for procurement department employees.

Payment Practices

The company also places great importance on timely settlement of obligations, recognizing its significance in building stable and responsible supplier relationships and ensuring financial liquidity throughout the supply chain. Payment terms applied in cooperation with suppliers are as follows:

- Suppliers located in the Far East – 150 days, 45 days EoM
- Suppliers located in Europe – 60 days, 45 days, 30 days EoM

The percentage of payments made according to applicable standard payment terms in 2024 was 45,74%, and the average invoice settlement time was 44 days.





5

ATTACHMENTS



IRO-2

The following table lists the disclosure requirements included in the cross-cutting and thematic standards considered in this report based on the conducted materiality assessment.

Disclosure #	Name of disclosure requirement	Page
ESRS 2 General disclosures		
BP-1	General basis for preparation of sustainability statements	5
BP-2	Disclosures in relation to specific circumstances	5
GOV-1	The role of the administrative, management and supervisory bodies	6, 51
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	7
GOV-3	Integration of sustainability-related performance in incentive schemes	7
GOV-4	Statement on due diligence	7
GOV-5	Risk management and internal controls over sustainability reporting	7
SBM-1	Strategy, business model and value chain	8-15
SBM-2	Interests and views of stakeholders	16,38, 47
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	17, 21,28, 36, 47
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	19, 28, 50
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	57
ESRS E1 Climate change		
E1-1	Transition plan for climate change mitigation	n/a
E1-2	Policies related to climate change mitigation and adaptation	22
E1-3	Actions and resources in relation to climate change policies	22, 24
E1-4	Targets related to climate change mitigation and adaptation	n/a
E1-5	Energy consumption and mix	24
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	25-27
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	n/a
E1-8	Internal carbon pricing	n/a
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	n/a

Disclosure #	Name of disclosure requirement	Page
ESRS E2 Pollution		
E2-1	Policies related to pollution	Irrelevant
E2-2	Actions and resources related to pollution	Irrelevant
E2-3	Targets related to pollution	Irrelevant
E2-4	Pollution of air, water and soil	Irrelevant
E2-5	Substances of concern and substances of very high concern	Irrelevant
E2-6	Anticipated financial effects from pollution-related impacts, risks and opportunities	Irrelevant
ESRS E3 Water and marine resources		
E3-1	Policies related to water and marine resources	Irrelevant
E3-2	Actions and resources related to water and marine resources	Irrelevant
E3-3	Targets related to water and marine resources	Irrelevant
E3-4	Water consumption	Irrelevant
E3-5	Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	Irrelevant
ESRS E4 Biodiversity and ecosystems		
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Irrelevant
E4-2	Policies related to biodiversity and ecosystems	Irrelevant
E4-3	Actions and resources related to biodiversity and ecosystems	Irrelevant
E4-4	Targets related to biodiversity and ecosystems	Irrelevant
E4-5	Impact metrics related to biodiversity and ecosystems change	Irrelevant
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	Irrelevant
ESRS E5 Resource use and circular economy		
E5-1	Policies related to resource use and circular economy	29
E5-2	Actions and resources related to resource use and circular economy	29
E5-3	Targets related to resource use and circular economy	31



Disclosure #	Name of disclosure requirement	Page
E5-4	Resource inflows	30
E5-5	Resource outflows	30, 31, 32
E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	n/a

ESRS S1 Own workforce

S1-1	Policies related to own workforce	39, 44
S1-2	Processes for engaging with own workers and workers' representatives about impacts	38
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	46
S1-4	Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches	38, 40, 42, 43
S1-5	Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities	40, 42, 43, 44
S1-6	Characteristics of the Undertaking's Employees	37,
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	37
S1-8	Collective bargaining coverage and social dialogue	n/a
S1-9	Diversity metrics	37, 42
S1-10	Adequate Wages	43
S1-11	Social protection	43
S1-12	Persons with disabilities	42
S1-13	Training and Skills Development metrics	40
S1-14	Health and safety metrics	44, 45
S1-15	Work-life balance	43
S1-16	Remuneration metrics (pay gap and total remuneration)	43
S1-17	Incidents, complaints and severe human rights impacts	46

ESRS S2 Workers in the value chain

S2-1	Policies related to value chain workers	48
S2-2	Processes for engaging with value chain workers about impacts	48
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	48

Disclosure #	Name of disclosure requirement	Page
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	48
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	n/a

ESRS S3 Affected communities

S3-1	Policies related to affected communities	Irrelevant
S3-2	Processes for engaging with affected communities about impacts	Irrelevant
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Irrelevant
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Irrelevant
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Irrelevant

ESRS S4 Consumers and end-users

S4-1	Policies related to consumers and end-users	Irrelevant
S4-2	Processes for engaging with consumers and end-users about impacts	Irrelevant
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Irrelevant
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Irrelevant
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Irrelevant

ESRS G1 Business conduct

G1-1	Corporate culture and business conduct policies	51, 52-53
G1-2	Management of relationships with suppliers	55
G1-3	Prevention and detection of corruption and bribery	54
G1-4	Confirmed incidents of corruption or bribery	54
G1-5	Political influence and lobbying activities	n/a
G1-6	Payment practices	55



External assurance

Verification Statement no 1884461-1

SGS Polska Sp. z o.o., with reasonable assurance, declares that the estimated carbon footprint of the organization:

Truvent Europe Sp. z o.o.
ul. Nowy Józefów 70
94-406 Łódź, Polska

for period:
1.01.2024 – 31.12.2024

is compliant with

GHG Protocol Corporate Accounting and Reporting Standard

for verified data:

Scope [market-based]	GHG emissions [tons CO ₂ e]
Scope 1	973,75
Scope 2	0,46
Scope 3	92 699,80
TOTAL market-based	93 674,01

Scope [location-based]	GHG emissions [tons CO ₂ e]
Scope 1	973,75
Scope 2	2 964,62
Scope 3	93 311,75
TOTAL location-based	97 250,12

Verifier name:
Wojciech Piskorski
Ryszard Scigala

Date of Opinion Issuance: 2025-05-28

Authorized by:

SGS Polska Sp z o.o.
Al. Jerozolimskie 146A,
02-305 Warszawa
+48 22 329 22 20

Page 1 of 3

This Statement is issued on behalf of the Client by SGS Polska Sp. z o.o. ("SGS") under its General Conditions for GHG Verification and Validation Services, available at http://www.sgs.com/terms_and_conditions.htm. This Statement does not relieve the Client from compliance with any regulations that applied to it. Stipulations to the contrary are not binding on SGS, and therefore SGS shall have no responsibility vis-à-vis parties other than its Client.

This statement is only valid with the details of the scope of work, verification criteria and its results contained in the attached Annex.

Annex to the Statement no 1884461-1

Truvent Europe Sp. z o.o.
ul. Nowy Józefów 70
94-406 Łódź, Polska

Introduction

Truvent Europe sp. z o.o. company has contracted SGS Polska Sp. z o.o. for the independent verification of greenhouse gas emissions, reported by the Truvent Europe sp. z o.o. for period 1.01.2024 – 31.12.2024 included in Report on corporate carbon footprint of Truvent Europe made by Climate&Strategy Foundation (*Raport z obliczeń emisji gazów cieplarnianych przedsiębiorstwa dla Truvent Europe sp. z o.o.* – file C&S_Truvent_Raport_21052025.pdf).

Roles and Responsibilities

The Operations Team of Truvent Europe sp. z o.o. is responsible for the organization's GHG information system, the development and maintenance of records and reporting procedures in accordance with that system, including the calculation and determination of GHG emissions information. The Operational Team is, in particular, responsible for calculating and determining information on greenhouse gas emissions and preparing the GHG emission inventory report (hereinafter "Report").

It is SGS responsibility to express an independent opinion on the GHG emissions verification described in the Report for the period – 2024 year, provided by Truvent Europe sp. z o.o.

SGS Polska Sp. o.o. did not participate in the estimation of the organization's carbon footprint for the verified year or for any previous year. The preparation and presentation of the verified information were entirely the responsibility of the verified Organization.

SGS conducted the verification based on ISO 14064-3: Greenhouse gases – Part 3: Specification with guidance for the verification and validation of greenhouse gas statements, through:

- Audit on-site
- Interview with the personnel responsible for determining the company's carbon footprint.
- Review of the documentation provided.
- Analysis of existing systems, processes and procedures used to determine greenhouse gas emissions.
- Analysis of the provided evidence, which supports the adequacy of the assumptions, exclusions, and GHG estimation methodology used.
- Analysis of data samples to confirm the correctness of data aggregation and calculations.

Scope

Truvent Europe sp. z o.o. has commissioned an independent verification by SGS of reported CO₂e emissions arising from their operations, to establish conformance with the requirements GHG Protocol The Greenhouse Gas Protocol Corporate Accounting and Reporting Standard Revised Edition.

Data and information supporting the GHG statement were historical in nature, projected, and proven by evidence.

- Organization's boundaries: three locations in Poland Strykow, Lodz, Wroclaw
- GHGs included: CO₂, CH₄, N₂O, HFCs, PFCs, SF₆
- GHG information for the following period was verified: 1.01.2024-31.12.2024
- Intended user of the verification statement: Truvent Europe Sp. z o.o., stakeholders.

Page 2 of 3

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Annex to the Statement no 1884461-1

Truvent Europe Sp. z o.o. ul.
Nowy Józefów 70,
94-406 Łódź, Polska

Objective

The purpose of this verification exercise was, through an objective evidence review, to independently verify and confirm:

- Whether the CO₂e emissions are as declared by the Truvent Europe Report.
- That the data reported is accurate, complete, consistent, transparent, and free of material error or omission.
- The estimates and GHG Report meet the requirements of GHG Protocol Corporate Accounting and Reporting Standard

Criteria

Criteria against which the verification assessment was undertaken included the following: WBCSD/WRI GHG Protocol, Corporate Accounting and Reporting Standard

Level of Assurance

Reasonable level of assurance

Materiality threshold

10 % materiality threshold

Conclusions

SGS concludes with a reasonable degree of confidence that the estimates and GHG Report provided are substantially correct, fairly represent GHG emissions, and comply with the requirements of the criteria described above.

Statement of competence and independence

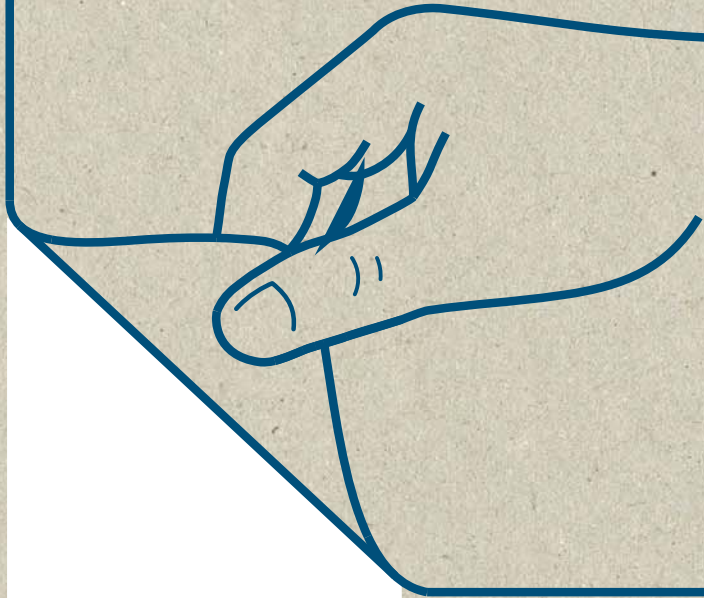
The SGS Group of companies is the world leader in inspection, testing and verification, operating in more than 140 countries and providing services including quality, environmental, social auditing and training. SGS affirms our independence from the Truvent, being free from bias and conflicts of interest with the organisation, its subsidiaries and stakeholders. We confirm that SGS Verifiers assigned to verification are independent from the verified organization and free from bias and conflicts of interest.

This Statement shall be interpreted in conjunction with the Report on corporate carbon footprint of Truvent Europe made by Climate&Strategy Foundation, as a whole.

Page 3 of 3

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 **TRUVANT**

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