



**Progress Report
2023**



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1 OUR COMMITMENT

We are delighted to share with you our renewed commitment to the United Nations Global Compact by means of this Progress Report.

From the outset, we have made it a priority to transform this company into an organisation with a strong sense of corporate responsibility. In line with this approach, in 2014 we adhered to the Global Compact to support the implementation of the 10 principles.

The CTLpack Group understands CSR to be an intrinsic and fundamental element of our activity as a company.

The scope of this report is limited to the companies CTLpack Vitoria and CTLpack Vichy.

The CTLpack Group releases the 2023-24 progress report on an annual basis via the corporate website and the Global Compact Network website, directly to the management of the CTLpack Group companies.

This year, to renew our commitment and further improve our CSR performance, we have focused on the well-being of people, equality plan, the implementation of indicators to monitor compliance with our commitments, product features and the circular economy with the development of new products with lower material consumption and better recyclability, as well as the use of recycled materials and investments in machines to support a more sustainable future.

Our Vision

A **trusted** partner for our customers, from the process of defining the most appropriate tube **packaging solution** for their functional and **sustainability** needs, to its delivery with the best **levels of service**, and acting in an **ethically responsible** manner with each and every one of our stakeholders.



<https://www.unglobalcompact.org/what-is-gc/participants/41671#cop>



15 mayo 2023

H.E. António Guterres
Secretario General
Naciones Unidas
New York, NY 10017
USA

Estimado Sr. Secretario General,

Me complace comunicarle que el Grupo CTLpack apoya los diez principios del Pacto Mundial referente a los Derechos Humanos, los Derechos Laborales, el Medio Ambiente y la lucha contra la corrupción. Mediante esta comunicación, expresamos nuestra intención de apoyar y desarrollar esos principios dentro de nuestra esfera de influencia. Nos comprometemos a hacer del Pacto Mundial y sus principios parte de la estrategia, la cultura y las acciones cotidianas de nuestra compañía, así como en involucrarnos en proyectos cooperativos que contribuyan a los objetivos más amplios de Desarrollo de las Naciones Unidas, en particular los Objetivos de Desarrollo Sostenible. El Grupo CTLpack comunicará claramente este compromiso a nuestras partes interesadas y al público en general.

Reconocemos que un requisito clave para participar en el Pacto Mundial es el envío anual de una Comunicación sobre el Progreso (COP) que describa los esfuerzos de nuestra compañía por implementar los diez principios y apoyar cualquier plataforma especializada del Pacto Mundial a la que nuestra compañía pueda unirse posteriormente. Apoyamos la transparencia y la rendición de cuentas, y por lo tanto nos comprometemos a reportar el progreso de aquí a un año de haber ingresado al Pacto Mundial, y anualmente desde esa fecha, tal como lo indica la política de COP del Pacto Mundial. Esto incluye:

- Una declaración firmada por el director general expresando su apoyo continuo al Pacto Global y la renovación de nuestro compromiso continuo con la iniciativa y sus principios. Esta es independiente de nuestra primera carta de compromiso para participar en el Pacto Mundial.
- Una descripción de las medidas prácticas (por ejemplo, la divulgación de las políticas, procedimientos, actividades) que la empresa haya tomado (o planea llevar a cabo) para implementar los principios del Pacto Global en cada una de las cuatro áreas temáticas (derechos humanos, estándares, medio ambiente, lucha contra la corrupción).
- Una medición de los resultados (es decir, el grado en que los objetivos/indicadores de rendimiento se cumplieron, u otras medidas cualitativas o cuantitativas de los resultados).

Atentamente,

Iñaki López Gandásegui
Presidente Ejecutivo

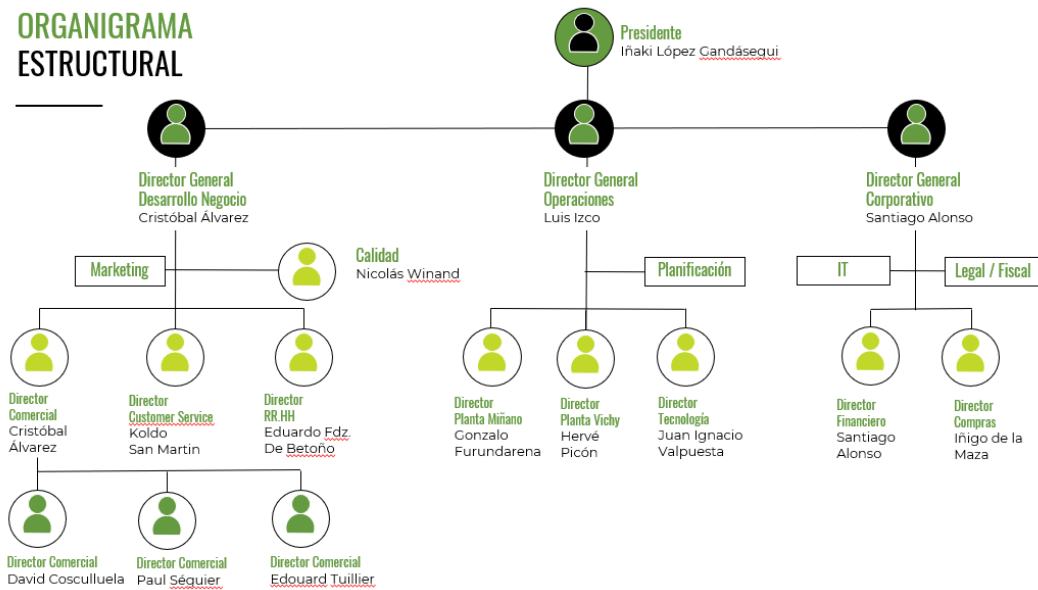
2 ABOUT US

2.1 Foundation

CTLpack was founded in 1964 with its head office in Vitoria-Gasteiz (Spain). We are a commercial company in the form of a limited company, our shareholders being Kaizaharra Corporación Empresarial SLU (KCE).

The governing body is the Board of Directors of the company and is chaired by its executive chairman, Mr. Juan Ignacio López Gandásegui.

ORGANIGRAMA ESTRUCTURAL



At present we have two plants in Europe, with the headquarters located in Vitoria-Gasteiz (Spain) and another plant in Vichy (France). In this way, we ensure that we are able to serve a broad portfolio of customers with increasingly international needs.

LA FUERZA DEL GRUPO



Entity name	CTLpack Group S.L.U.
Address	Hermanos Lumiere 1, Miñano (Álava)
Most senior ranking manager	Iñaki López Gandásegui
Date of adhesion	30/07/2014
Number of people	552
Sector	Chemical industry / Manufacture of packaging
Activity, main brands, products and/or services	Design, development, production and marketing of flexible plastic and metalloplastic tubular containers, caps and components for such containers.
Sales / Turnover	€ 74,000,000
Significant financial assistance received	€0
Countries in which it operates (where the organisation conducts most of its business) and markets served:	France, Spain, USA, Italy, Germany, UK, Northern Ireland, Belgium, Netherlands, Sweden, Denmark, Portugal, Peru.

What sets us apart

- We are the **strategic partner** for tube packaging
- **The best plastic and laminated tube solutions.**
- **More than 60 years of experience** backed by our R&D&I Centre.
- **Extensive and comprehensive catalogues.** Different tube manufacturing and printing technologies.
- Our state-of-the-art laboratory allows us to carry out **compatibility tests** to speed up new projects, solve problems and research **new alternative raw materials** applied to our packaging.
- We develop and present **fully representative samples of the final product.** We formulate our own plastic dyes and inks without relying on third parties. In addition, our customers can **check "in situ"** that the final result conforms to the design created, during which they will receive a personalised welcome and attention.
- We produce **our own caps in-house.** We also have several decorative and metallised cap lines to offer high value-added options.
- We have **two plants in Europe**, thus serving a wide range of customers with increasingly international needs.

2.2 History of the CTLpack Group

Since its foundation in 1964, the CTLpack Group has been characterised as a company concerned with the promotion and development of human values, encouraging the professional development of the people who make up the CTLpack business group.

Another important feature of the company is our concern for producing a high quality product. This is achieved through the company's commitment to technology and active and continuous listening to the customer in order to provide solutions to their needs.

Today, the challenge for our company is to maintain the strengths of the past while assuming that we must increase our business area in Europe. The aim is to reach more customers without losing the sensitivity of offering them a personalised service.



C

1964

Foundation: Tuboplast Hispania is founded in the old factory in Gamarra (Vitoria-Gasteiz) producing extruded tubes.
15 years later the company starts the production of laminated tubes

1989

Opening of CTL Industries in Vichy (France), as the Group's second production site

C



1993

CTL Packaging (France) is established as a sales office based in Paris.

C

1998-1999

Tuboplast Hispania (Vitoria) obtains the ISO-9001 quality certificate (AENOR).

CTL Packaging and CTL Industries (France) obtains the ISO-9001 quality certificate (AENOR).

C



Er-1649/2009



2002

Tuboplast moves to the Miñano Technology Park (Vitoria) and three years later CTL Packaging & CTL Industries merge into CTL Packaging SAS.



2006

CTL Packaging (France) doubles its space.



Tuboplast Hispania (Vitoria) and CTL Packaging (France) obtain the OHSAS 18001 Occupational Health and Safety Management System certification (AENOR).

C

2001

2001 – Tuboplast Hispania (Vitoria) obtains certification under the ISO 14001 Environmental Management System (AENOR).

C



C

2005

CTL Packaging (France) obtains certification under the ISO 14001 Environmental Management System (AENOR).

C



C

2009

Tuboplast is restructured into 3 companies:

- CTL-TH PACKAGING (Group).
- Tuboplast Hispania.
- CTL-TH Engineering



SST-0021/2009

CTL-TH Engineering obtains the ISO-9001 quality certificate (AENOR).



Er-1649/2009

2010

CTL-TH Engineering obtains the ISO 14001 Environmental Management System certification (AENOR).



GA-2017/0314



2013

Start of ESTube tube manufacturing activities in the US market.

2014

The company's first commitment to the code of ethics.



Adherence of the CTLpack Group to the United Nations Global Compact



2015

Launch of the "ESTube" model onto the European market.

2017

The Group receives the Ecovadis Gold category award for the Group's sustainability practices.



2019

First European recognition for CTLpack's initiatives for participation in the circular economy and the integration of recycled plastics in production.

2020

KCE capital becomes majority shareholder.



The Group chooses to unify the different brands under one name: CTLpack Group.



2022

The Group improves the Ecovadis category recognition to Platinum thanks to the excellent sustainability practices carried out by the Group.



<https://www.ctlpack.com/>

C



C

2021

The Group obtains ISCC Plus certification. This certificate makes it possible to make purchases of circular materials and thus focus on the circular economy.



CTLpack Vitoria launches a unique and innovative employee well-being initiative in Spain to preserve the musculoskeletal and mental health of its employees

C



In 2016, CTLpack joined the LinkedIn network to interact more closely with its stakeholders. In 2022, it revamps its website with a modern and up-to-date image in line with the needs of its customers.

C

2023

CTLpack Vichy becomes involved with the Protection of the oceans by obtaining the Attestation of Conformity to the provisions of the "Prevention of Losses of Industrial Plastic Granules" (IPG).

2.3 Products

The current product range offers an extended variety of options that allow the customer to have a product with a lower environmental impact at their disposal. We currently have 5,000 references and manufacture 740 million tube units.

LAMINATED



Tube technology with high barrier properties.

- Cosmetics
- Pharma
- Food

EXTRUDED

COEXTRUDED



One of the most widely used technologies in the manufacture of flexible plastic tubes.

- Cosmetics
- Pharma

INJECTED (ESTube)



IML (In Mould Labelling) tube technology by injection moulding.

- Cosmetics
- Pharma

3 AWARDS AND RECOGNITIONS

The CTLpack Group has a distinguished history as being a company focused on technological and product innovation, the development and well-being of its people and its commitment to society.

By way of example, we highlight some of the initiatives and mentions that we have received as a company in recent years.

Global Compact



CTLpack Group

Recognised as a signatory member.
Recognition for our Commitment on the 75th anniversary of the Global Compact.

2014-2021

Blissim



CTLpack Vitoria

2021 Blissim Beauty Award in the Revolution of the Year category
Supplier Excellence Award New Packaging Innovation

2021

MORE



CTLpack Vichy, CTLpack Vitoria

Company committed to the circular economy.

2019
2020
2021
2022
2023

PRS Green Label



CTLpack Vichy

For its active contribution to a pallet circulation pooling and re-use management system.

2019
2020
2021
2022

EcoVadis



CTLpack Group

Company among the top 1% of most highly rated companies by EcoVadis in our sector.

- 2017 -> 2022 Gold Medal**
- 2022 -> Platinum Medal**
- 2023 -> 2023 Gold Medal**

AXPO – Green energy



CTLpack Vitoria

Energy from 100% renewable sources.

- 2020**
- 2021**
- 2022**

CONAI



CTLpack Group

“CONAI Academy Week” Award

“The judges of the Call for Good Ideas launched by CONAI for the compilation of good practices in environmental labelling has assessed your proposal favourably, identifying it as a good idea for a label!”

- 2021**

ISCC plus



CTLpack Vichy, CTLpack Vitoria

ISCC plus certification.

- 2021**
- 2022**
- 2023**

Women's Day



The CTLpack Group is committed to equality. We apply equal pay and equal treatment and implement measures to support work-life balance, such as flexible and/or reduced working hours.

CTLpack Vitoria
2022
2023

CTLpack VICHY
2022
2023
2024



Unavida receives award at the VPC Green Beauty Awards 2022



CTLpack Group

Accolades awarded by online voting from consumers in the VPC Green Beauty Awards to our customer UNAVIDA for its "Creamy Cream" face cream tube thanks to the tube manufactured by CTLpack made from PCR, avoiding the use of metallic inks as they are the most polluting, with light colours so that recycling plants can detect them more easily.

2022

Azurmendi Award (SEA)



CTLpack Group

A tribute to the trajectory of companies and entrepreneurs from Alava, the result of the daily good work of all the people who make up CTLpack.

2022

IPG Attestation



CTLpack Vichy

Protecting the oceans by preventing the Loss of Industrial Plastic Granules (IPG).

2023

Recognition of its social policies

GÉNÉRATION ENTREPRISES
sites socioprofessionnels

Premier bilan positif pour la politique sociale de CTLpack Vichy

Alors que les problématiques de recrutement s'accroissent pour de nombreuses entreprises industrielles, la mise en place d'une politique sociale attractive devient un atout différenciant. C'est ce qu'a entamé il y a près d'un an CTLpack Vichy, spécialiste de la fabrication de solutions de packaging de tubes plastiques à haute valeur ajoutée.

CTLpack Vichy

Recognition for the implementation of attractive social policies.

Recruitment of staff.

Nov-2022

INTERPARFUMS customer award



CTLpack Vichy

Recognition of 20 years of collaboration between CTLpack and its customer, INTERPARFUMS, with the presentation of 2 "Coffrets de parfums" to the 200 employees of CTLpack Vichy.

2022

Naturally sustainable and socially committed

- More than **15 years** working on and **researching** sustainable development
- Our strategic objective is to be the benchmark in **Services and Sustainability** for the tube packaging market.
- Since 2017, we have received the **Ecovadis Gold Medal** and in 2022 we achieved the **Platinum Medal**, and we were one of the first companies in the sector to obtain the **ISO 14001 Environmental Management** certification.
- In 2018 CTLpack became a signatory to the **United Nations Global Compact**. We have aligned our strategies with the **10 universal principles** on human rights, labour, environment and anti-corruption, and with the Sustainable Development Goals (SDGs) for 2030.
- More than just an industrial company, CTLpack is a **social enterprise**, 100% committed to the preservation of our planet in order to leave the best possible legacy for future generations.



4 BACKGROUND

2022, together with the last 3 quarters of 2021, was characterised by a high level of activity due to the restocking policies followed by the sector after the post-Covid period and the raw material crisis that affected the cosmetics industry during that period.

In 2023, there was a readjustment in the business activity and throughout this period we maintained our commitment to CSR, with actions such as; consolidating employment, training, investments in improving facilities and production processes, as well as our commitment to the development and use of both raw materials and sustainable processes.

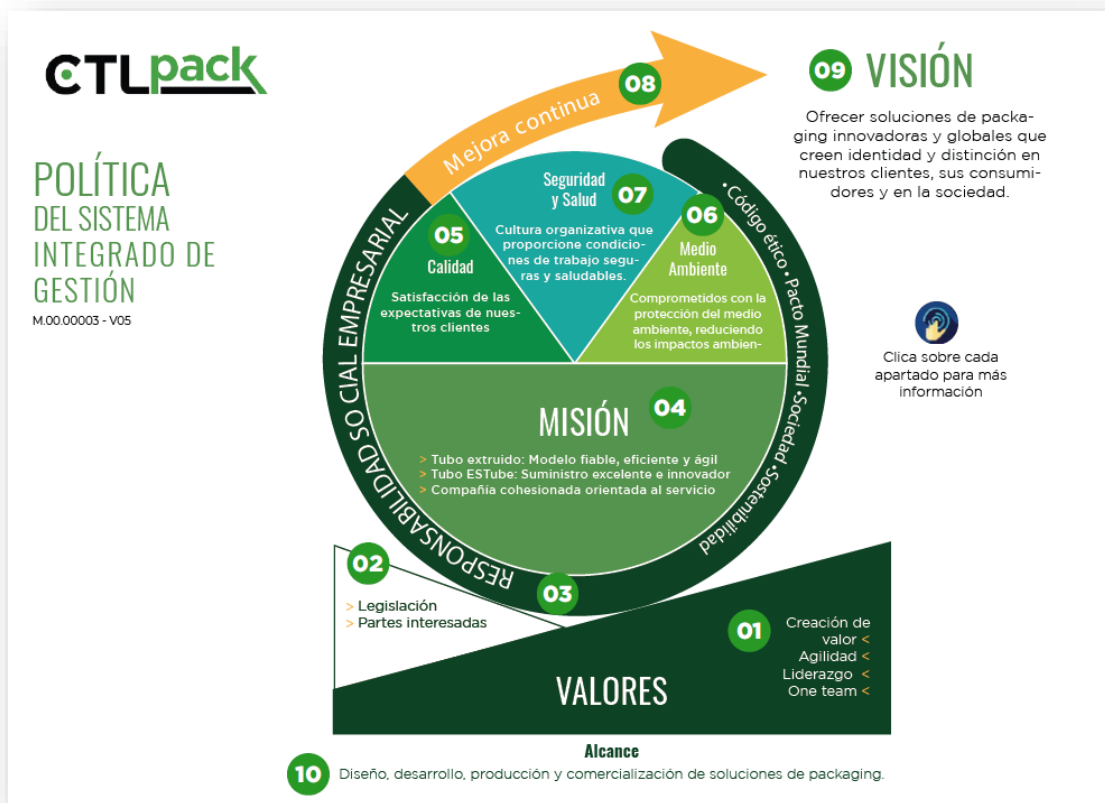


5 STRATEGY AND GOVERNANCE

5.1 Policy

Within the current framework of the company's strategy, our POLICY integrates the elements of vision, mission and values with the expectations of our stakeholders in terms of ethical, social and environmental responsibility.

In addition to the areas linked to business strategy, the main goals are to work towards achieving a cohesive organisation with a clear customer focus, in which matters of transparency, information, participation and people's commitment will be key areas of work in the coming years.



<https://ctlpack.com/politica-sig/>

The CTLpack Group's business venture is aligned with the following **Mission**:

- Be a **trusted** partner for our customers, from the process of defining the most appropriate tube **packaging solution** for their functional and **sustainability** needs, to its delivery with the best **levels of service**, and acting in an **ethically responsible** manner with each and every one of our stakeholders.

In addition, CTLpack is building its future with a **Vision**:

- Be a leading partner in the definition and deployment of **sustainable packaging** roadmaps for our customers, with a **human team** fully identified with the Mission, Vision and Values of the company.
To be a benchmark in the development of new sustainable packaging projects.

And with a series of **Values** that define the way it operates and on which its policies are based:



Create value

Efficiency in operations so that the whole company works to maximise shareholder value.



Agility

Ability to provide excellent customer service; this implies the ability to listen to customers, to understand their needs and to satisfy them with excellence.



Leadership

Ability to lead, guide, align, inspire and direct people.



One team

Achieve an aligned and cohesive team in which all parties strive to accomplish a common goal.



Commitment

Worker loyalty bond whereby employees acquire responsibility for each other's objectives and for the objectives of the company.

This set of values and behavioural principles are included in the CTLpack Group's Code of Ethics, which constitutes the guide for the conduct of its professionals and is applicable to all management and staff, and the ethical principles that inspire them are also promoted among all its suppliers and collaborating companies.

5.2 Code of Ethics

In 2011, the CTLpack Group defined and implemented a company Code of Ethics.

The latest version of our Code of Ethics dates from September 2022 and has been adapted to the requirements of the Sustainable Development Goals (SDGs) and, in particular, all regulations and provisions relating to privacy and data protection have been subject to special attention.



All the people that belong to the CTLpack Group undertake to respect, in all their activities, the fundamental rights of individuals and the public freedoms recognised by national and international agreements, establishing the obligation to carry out all their activities with full respect for human dignity.

The Code of Ethics of the CTLpack Group has the firm objective of establishing the guidelines, values and principles by which the behaviour of the people in the organisation must be governed, with regard to the company's relations with its stakeholders, both in terms of the company's work activity with the staff, as well as its relations with customers, suppliers and external collaborators, shareholders, public and private institutions, and society in general.

This Code of Ethics is based on the definition of the Mission, Vision, Values and Principles defined by the CTLpack Group, and represents a guide to ensure appropriate behaviour among the staff during their professional activities.

It will also require **suppliers, customers** and **collaborating companies** with which it has a business relationship to respect these principles, and will establish this requirement as a further criterion for their selection and for the maintenance of such business relationships.

The Code of Ethics sets out specific action guidelines covering the following subject areas:

- | | | | |
|---|--|----|---|
| 1 | Fundamental Rights | 10 | Patents and copyright |
| 2 | Respect for people | 11 | Money laundering and payment irregularities |
| 3 | Privacy and data protection | 12 | Bribes, gifts and hospitality |
| 4 | Equal opportunities and non-discrimination | 13 | Use of company assets |
| 5 | Health and safety | 14 | Conflict of interest |
| 6 | Protection and care of the corporate brand, image and reputation | 15 | Customer relations |
| 7 | Respect for the Environment | 16 | Supplier relations |
| 8 | Alcohol and drug use | 17 | Compliance with the Code of Ethics |
| 9 | Order and cleanliness in the workplace | 18 | Validity |

The Committee for the application and monitoring of the Code of Ethics is in charge of ensuring compliance, resolving incidents or doubts about its interpretation and adopting the appropriate measures for improved compliance. The mission of this committee is to promote the dissemination and application of ethical principles across all the organisation's activities. The Implementation and Monitoring Committee is made up of the General Management, the HR and IMS departments of each of the CTLpack Group companies and a representative of the workforce.

The channels for consultation and information on everything related to this Code of Ethics are:

- Personally, approaching any of the members of the Ethics Committee or by filling in the "Complaint - Code of Ethics" form and depositing it in the box provided for this purpose.
- Anonymously, by means of the "Complaint - Code of Ethics" form and depositing it in the box provided for this purpose.
- Anonymously, through the Whistleblower Channel on the homepage of the www.ctlpack.com website.



<https://ctlpack.com/codigo-etico/>

6 METHODOLOGY

In order to reaffirm our commitment, the CTLpack group has established and defined the most significant issues to be included in this Progress Report in the following way:

We started by selecting the **stakeholders** with the greatest impact on our activity.

In a second step, for each of the principles, we examined the situations in terms of **policies**, establishing a **diagnosis and follow-up** and defining **actions**.

Since 2018, we have included the contents of the **Sustainable Development Goals** (SDG) in our policies and reports.

6.1 Stakeholders

This Progress Report is based on the stakeholder reporting methodology. The stakeholder concept is key to understanding CSR. The complexity and dynamism of today's business environment has made it necessary to acquire a solid commitment to the different stakeholder groups directly or indirectly affected by the company's mission.

Identifying stakeholders and their expectations are key to facilitating the comprehensive implementation of CSR in any organisation.

This allows us to anticipate potential risks or opportunities and to establish policies, actions, tools and monitoring indicators such as those contained in this report.

The CTLpack Group has prepared the following Progress Report, selecting the most important stakeholders of its organisation, and then identified the most significant challenges for the selected stakeholders as well as their needs and expectations.

Of all the stakeholders identified (Shareholders, Agents, Associations, Training Centres, Technology Centres, Competition, Foundations, Regulators, Trade Unions, Society and the community), this report will evaluate the 3 groups with the greatest impact on the definition of our management and corporate development policies: **Customers, Employees, Suppliers.**

The following defines the systems established to compile the needs and expectations, as well as the risks identified, for each of these 3 Stakeholders and which allow us to define the elements for the writing of this report.

6.1.1 Customers

The identification of their needs and expectations is carried out via:



6.1.2 Employees

The compilation of their needs and expectations is carried out through a variety of forums such as regular communication meetings with people, work climate or satisfaction surveys, meetings with staff representatives and with prevention delegates.

6.1.3 Suppliers

The compilation of the needs and expectations is achieved through activity or sector forums in which we jointly participate, direct suggestions incorporated into our quality management system through the registration of incidents, non-conformities and supplier audits, through visits, quality, environmental, prevention and CSR audits and awareness meetings (Business Review,..) and, lastly, on the basis of the active monitoring we carry out (supplier and competitor websites, magazines, trade fairs, etc.)

6.2 Analysis

POLICIES

Formal written documents that define the values, tools and mechanisms for prevention and control of the risks detected in the diagnosis.

This regulates the communication and relations between the company and its stakeholders.

DIAGNOSIS / MONITORING AND MEASUREMENT OF IMPACTS

The diagnosis allows us to carry out an analysis of the relationship between stakeholders and our company with respect to the issues contained in the 10 principles.

We have to conduct a risk analysis with indicators that allow us to launch actions with their objectives for each principle.

It is therefore possible to know what policies and actions should be taken for each Principle and what objectives should be set.

Monitoring allows us, by means of the relevant indicators, to provide the tools to control compliance with policies and helps to detect flaws in the management system for subsequent improvement.

ACTIONS

Once the necessary policies have been formalised and the diagnosis has been made, the actions will be used to implement these policies.

The actions will help the organisation to shape the policies developed and minimise the risks identified. Actions are planned over time and are designed based on the target stakeholder group they are aimed at.

6.3 Evolving from Principles to SDGs

In previous reports, we dealt exclusively with the 10 principles of the United Nations Declaration.

Declaration	No.	Principle
Human Rights	P1	To support and respect the protection of Human Rights.
	P2	To not be complicit in human rights abuses.
Labour Standards	P3	To support freedom of association and collective bargaining.
	P4	To support the elimination of all forms of forced and compulsory labour.
	P5	To support the eradication of child labour.
	P6	To support the abolition of discriminatory practices.
The Environment	P7	To maintain a preventive approach that favours the environment.
	P8	To encourage initiatives that promote greater environmental responsibility.
	P9	To encourage the development and dissemination of environmentally friendly technologies.
Fight against corruption	P10	To work against corruption in all its forms.

Since 2018, we have been incorporating the concepts derived from the 10 principles into this report, moving to a new format that is embedded in the current structure of the SDGs.

We have decided to focus on those SDGs where we have the most impact as a company.

In 2020, the Alava Chamber of Commerce carried out a diagnosis to measure our progress in internationalisation and the progress of CSR in order to meet the demands of the markets and the requirements in terms of good practices and responsible results for companies, due to the major challenges set by the SDGs that CTLpack must address.

CTLpack Group's contribution to the SDGs



Boost the local economy where the company has operations.
Promote economic opportunities, creating decent employment, in safe and healthy working conditions that exceed legal compliance, producing responsible and quality products.
Adequate wages for workers and **non-discriminatory** recruitment and promotion processes, giving vulnerable groups the opportunity to develop in the workplace on an equal basis and have access to a dignified life. **Adequate working conditions** on an equal basis.
Promote youth employment.
 Pay **fair prices** to all suppliers.
Contractual clauses with suppliers regarding human rights matters.
Actions to mitigate and adapt to climate change along the entire value chain
Reduce the environmental impact of activities and operations, avoiding environmental and economic crises that impact on the population.
 Carry out **social initiatives** to help groups at risk of poverty.



Health and safety at work risk prevention systems.
 Provide **decent working conditions for employees** so that they can have access to healthy food and medicines.
 Require and ensure **that subcontractors** comply with safety measures.
Regular health and safety training for all employees.
 Promote a **healthy lifestyle** among employees.
 Reduce the environmental impact of the company's operations and the use of **chemical products** to avoid polluting and improving the health impacts on local communities or employees.



Provide **training and continuous learning opportunities to employees** to improve their skills.
 Students on **work experience**, to support the technical knowledge of the young people.
 Train new generations through **good business practices**, company visits, **lectures and employee talks** in schools, colleges, universities, business schools, business associations, etc.
Participate in forums and meetings of sectoral and business associations, where **good practices in sustainability are disseminated.**



The Group has been a signatory to the Global Compact since 2014 and contributes to the fulfilment and protection of fundamental human rights.
Corporate culture that promotes equality and gender mainstreaming in all people management policies.
Equality Plan with commitments, policy, annual objectives and measures. The CTLpack Equality Policy does not tolerate any discrimination on the grounds of sex in any of the Group's personnel management processes.
 Equality training is included in the training plan.
 Work-life balance measures aimed equally at women and men, some systematised by agreements, and others specifically negotiated and approved by HR and the respective Director. People benefiting from a work-life balance measure are not discriminated against in terms of remuneration (fixed or variable), social security benefits, performance evaluation or recognition at work.
 Zero tolerance towards any form of violence in the workplace, including verbal and physical abuse. Anti-harassment protocol.
 Ensure equal opportunities for women as regards access to positions of responsibility and senior management.
 Commitment to external communication with messages and images consistent with equality values.



Certified environmental **management system.**
 Conduct **sustainable water management in the company's operations and factories**, with a policy of water consumption and reuse.
 Invest in **technologies** that improve sustainable water management in the short and long term, (closed cooling circuits in machines).
 Workers have **access to clean water** and to appropriate spaces for personal hygiene within the premises.
Raise employee awareness of the importance of efficient use and sustainable management of water and chemicals in manufacturing processes.

Improve the **quality of wastewater discharges** and reduce the use of hazardous materials and chemicals in the company's operations in order to minimise the environmental impact (cleaning with solvents).



Establish internal measures for **energy savings and efficiency**.
 Raise awareness of **energy** efficiency matters among employees and suppliers.
 Invest in efficiency throughout the supply chain, to help reduce the energy cost of transporting products and services.
 Controlling the use of energy for travel of employees, suppliers and in the distribution of products, promoting sustainable mobility.



Comply with tax laws and regulations in the countries in which we operate, fostering their economic growth.
Freedom of association and the right to collective bargaining.
Decent working conditions for all employees and suppliers of the company, both nationally and internationally, ensuring non-discrimination in hiring, remuneration, benefits, training and promotion.
 Promote **employment of young people** in the company through recruitment, scholarships and work experience programmes.
Fair supplier selection policies and improved **economic inclusion** throughout the supply chain.
Efficient use of natural resources, reduce environmental impact, promote sustainable economic growth.
Boost the local economy and culture where the company operates by hiring local people and companies.
Collaboration with NGOs, universities, the public sector, business associations and other companies to implement projects that contribute to sustainable economic growth.



Implementation of ISO 9001 and ISO 14001
Innovation as a key factor in the corporate culture, developing products, plants and production processes with **sustainability criteria**.
 Responsible Innovation, **environmental elements as input for new designs/developments**.
 Implementation of **new technologies** to improve competitiveness, with a focus on sustainability.
 Adapt the company to a **low-carbon economy**, thus reducing CO2 emissions and pollution and promoting energy efficiency.
 Distribution **logistics** innovation using sustainability criteria, optimising orders.
 Provide **technical and technological training** in universities and vocational training centres.
 Collaborate with companies in the sector to promote **sustainable innovation throughout the value chain**.
Participate in forums, with clusters and technology centres, for the sustainable transformation of business processes and activities.



Anti-Corruption, bribery and money laundering policy, with a direct impact on inequality.
 Through the **Code of Ethics** - Promote a culture of peace and coexistence based on respect for human rights.
 Decent working conditions for employees and throughout the supply chain.
Equality Plan, existence of internal policies to select, recruit, train and develop professionals that guarantee equal opportunities, not allowing any discrimination on the grounds of sex, ideology, culture, race, religion, age, sexual orientation or functional diversity.
Internal communication, dissemination and awareness-raising.
Adapt the physical environment to ensure the health and safety of stakeholders with disabilities.
Social action with disadvantaged groups



Environmental management based on **ISO 14001**

Control and monitoring of environmental impacts.

Reduce pollution in the plant through energy efficiency, the reduction of volatile organic compounds, the use of sustainable materials with low environmental impact, responsible waste management, by making employees aware of these issues and implementing the necessary processes.

Apply **circular economy** principles that reduce and recover waste, thus decreasing the amount of waste going to landfill sites.

Provide decent working conditions and wages for employees and suppliers, so that they are able to **access adequate, safe and affordable housing and basic services.**



Promote business practices that have a positive impact on the environment, society and the economy.

Policies and targets for waste prevention, reduction, reuse, recycling and management, adapting sustainable practices and reporting on them.

Extend the useful life of the product placed on the market. Use recyclable materials in the production of products, **collaborating in the value chain.**

Invest in eco-innovation for the development of more sustainable practices and technology.

Minimise air pollution and waste in production processes, using elements that are low in toxic substances.

Energy efficiency measures.

Reuse of water in the only process in which it is used in production.

Inform customers about sustainable consumption guidelines.

Produce a **report on progress with the 10 Principles of the Global Compact**, to inform its stakeholders of its contributions to sustainability, fostering these practices.

Participate in clusters and with technology centres to promote sustainable production and consumption practices and patterns.



Environmental management based on ISO 14001

Actions **to mitigate and adapt to climate change.**

Invest in **R&D&I** to find new solutions to **climate change.**

Invest in the development of innovative **low-carbon emission products.**

Measure the carbon footprint to set short and long-term emission reduction targets.

Train employees in the fight against climate change.

Establish **energy efficiency and emission reduction** criteria in company buildings and premises.

Introduce criteria for the **circular economy** in the company's activities, using raw materials efficiently, promoting recycling and reducing waste.

Respect ecosystems and biodiversity in the company's operations, carrying out processes to avoid negative impacts in the areas where the company operates.



Implement **environmental management systems** that prevent and minimise the impact of the company's activities on terrestrial ecosystems and biodiversity. (Actions to minimise plastic waste).

Comply with environmental legislation

Implement policies and practices for the **sustainable management of natural resources** in the organisation and throughout the supply chain.

Actions in **Ecodesign, Life Cycle and Circular Economy.**

Invest in **R&D&I** to find new solutions for the preservation of terrestrial ecosystems.

Purchase products with recycled material content, (cardboard boxes, recycled plastic pallets...).

Harness technology to **reduce paper emissions**

Not create an impact on land within or adjacent to **protected areas or areas of high biodiversity.**



Transparent relations with Governments and Administrations in the countries in which it operates. **Compliance with tax legislation and obligations.**

The CTLpack Code of Ethics which includes **respect for Human Rights and the Anti-Corruption and Bribery Policy, and the Gift Policy**, to which all CTLpack personnel adhere.

Contribute to the fulfilment and protection of internationally recognised fundamental human rights, and not be directly, beneficially or silently complicit in any form of abuse or violation of these rights among any stakeholder group in all activities and geographical areas where it operates.

Promote respect for human rights in the supply chain, a requirement for approval and the introduction of contractual clauses for suppliers.

Protocol against harassment, abuse, intimidation or violence in the company and

measures to enforce it.

Right to **freedom of association and the right to collective bargaining**.

Whistleblowing channel set up for stakeholders to report any potential non-compliance with the Group's commitments and policies. The **Ethics Committee**, investigates and responds to these complaints.

Legal acquisition of any type of property (intellectual, financial or material).



Include and inform Stakeholders of the **SDGs in the CTLpack progress report**, explaining the Group's contributions to sustainable development.

Integrate the SDGs into corporate culture, identifying those Goals related to the company's core business, in order to work on them as a matter of priority.

Raise awareness of the SDGs among CTLpack personnel, establishing common values across the organisation.

Measure progress in the company's contribution to the SDGs.

Include the development of **alliances and partnerships** in the CTLpack Sustainability strategy.

7 PROGRESS REPORT

7.1 Human Rights

P1

Businesses must support and respect the protection of internationally recognised fundamental Human Rights within their sphere of influence.

P2

Businesses must ensure that they are not complicit in Human Rights abuses.

7.1.1 Sustainable Development Goals 3, 4, 5, 8, 10, 16

Within the Human Rights principle, the following SDGs have been identified in relation to the CTLpack Group's activity.



3 Good health and well-being



4. Quality education



5 Gender equality



8. Decent work and economic growth



9. Reduced inequality



16 Peace, Justice, and Strong Institutions

7.1.2 Policies

Our policies and objectives are aligned with supporting and respecting the protection of internationally recognised fundamental human rights.

The organisation has drafted and implemented a Code of Ethics in our company. This Code of Ethics was updated and revised in 2022, adapting it to a greater involvement of workers' representatives.

Since becoming ISO9001 certified in 1998, we have built a comprehensive internal management system that incorporates policies, regulations and procedures on product quality, verification controls and manufacturing processes to international standards.

Our management system, in addition to the procedures and work processes related to the organisation, the people within it and their interrelationships, also determines the standards in relation to our product and our supply chain.

There are integrated procedures in our management system linked to policies, regulations and internal processes related to quality, human resources, organisation, customer service and suppliers: "P.00.00015 - Monitoring the Code of Ethics and Functions of the Ethics Committee and Protocol for reporting breaches of the Code of Ethics".

Furthermore, with regard to **employees**, we maintain within the general internal management document, all the processes of personnel selection, recruitment, reception, labour relations, conflict management, promotion, objective performance evaluation, etc., reflecting the configuration of our internal organisation, the distribution by areas and functions.



At the CTLpack Group, we base our health and safety policy on an organisational culture and working environment where prevention and safety are the first considerations and conditions for all activities, reducing risks in all our processes and providing safe and healthy working conditions, with the aim of eliminating hazards and preventing injuries and the work-related deterioration of health.

This is based on:

- Consultation with and participation of workers.
- Machines and processes that are safe for workers.
- Continuous training in the area of Health and Safety of Workers.
- Integration of the entire organisation.
- The promotion of healthy habits.

In 2009, we implemented a Health and Safety Management System (ISO45001), which allows us to monitor and control our management of this area. We regularly undergo an Occupational Health and Safety Management System audit.

In terms of occupational health and safety prevention, CTLpack Vitoria is a member of the San Prudencio Joint Prevention Service, which covers the four required specialities of Safety, Hygiene, Ergonomics and Applied Psychosociology, and, in the case of CTLpack Vichy, Health Surveillance and its own Prevention Service, although it has contracted health surveillance with an external entity.



Based on this mission and our company Values, we have launched a number of initiatives to raise people's levels of commitment and involvement with the company's objectives.

We have an annual training plan for all our staff based on a needs assessment.

In addition, in 2021 we launched an ongoing initiative to improve the physical and emotional well-being of the people in the company. In collaboration with private organisations that support workers' health, several lines of work have been opened:

- First, in order to improve and strengthen the musculoskeletal health of workers, CTLpack offers the opportunity of a physiotherapist in case of a pathology and visits to a specialised clinic.
- In view of the growing number of cases associated with psychological and emotional problems, a stable collaboration has been established with a specialised psychiatrist's practice that provides personalised and confidential care to workers who request it.
- Thirdly, in order to better match jobs to an individual's specific situation, work is now being carried out with an osteopathic specialist who provides postural training and education on how to prepare for work: warm-up, stretching, visual relaxation, respiratory relaxation, preventive movements...

In the section on **Customer service**, we include the guidelines for relations with this stakeholder group, in terms of work-flow, generic and personalised attention, control of the service and technical assistance, resolving incidents and measuring their impact, etc.

We have an established working relationship with our customers, whereby they send us their Codes of Ethics and standards of conduct so that we can verify that their content is consistent and can be complied with by our organisation on the basis of our own standards.

At the same time, our company informs and shares with some customers our Code of Ethics that governs the actions of our organisation and its employees in the professional field and in relation to themselves.

We encourage you to visit our website where you can learn about our commitment to Sustainable Development, which includes our Code of Ethics, our adherence to the Global Compact and our progress report.

In our **Supplier** evaluation procedures, we include how they are incorporated into our management system, the performance of controls, including CSR and satisfaction checks on quality, services, operations, etc.

The fundamental tool on which our relationship with suppliers is based is the Business Review, which is from a different viewpoint to the transactional one, where, in addition to these transactional aspects, a reminder of our policies is always provided, as well as annual objectives for improvement in all the sections included. For example, the non-approval of violations of Codes of Ethics (including bribery etc.), or the assessment of compliance with environmental measures, are made explicit.

We have adapted our procurement policy in line with the CSR principles of our current management system.



7.1.3 Diagnosis, monitoring and measurement of impacts



We can affirm that the CTLpack Group strictly complies with the legal regulations in this area, as the companies are permanently subject to public control by the administration, and also by the company's internal mechanisms (HR department and workers' representatives), which guarantee compliance with the aforementioned regulations, as well as compliance with our customer's ethical standards.

In order to ensure compliance with the Code of Ethics, resolve incidents or doubts about its interpretation and adopt the appropriate measures for better compliance, there is a Committee for the application and monitoring of the Code of Ethics. The mission of this committee is to promote the dissemination and application of ethical principles across all the company's activities. It will be made up of the representatives appointed by the General Management and a worker representative.



Percentage of complaints relating to the code of ethics or administrative matters dealt with within the Group



Year	CTLpack Vichy	CTLpack Vitoria	Total
2017 Res.	None	None	None
2018 Res.	None	100%	100%
2019 Res.	100%	None	None
2020 Res.	100%	None	100%
2021 Res.	100%	None	100%
2022 Res.	None	None	None
2023 Res.	None	None	None
2024 Obj.	None	None	None

During the 2023 financial year, there were no new complaints regarding the Code of Ethics.

Complaints filed prior to 2023 have been dealt with and resolved, after having launched the necessary actions that allowed a return to a normalised situation, generating an appropriate working climate.



In relation to **employees**, the company is aware of the physical and psychological problems that are generated for people in their professional environment, both due to the high age of the staff and the problematic situations arising from their personal life

We recently launched an ongoing initiative to improve the physical and emotional well-being of the people in the company. In collaboration with the San Prudencio Employment Foundation, two areas of work have been opened, one to tackle musculoskeletal problems in collaboration with the specialised Nordic Clinic centre, and the other for emotional and psychological problems.

At the Health and Safety level, we monitor the efficiency of our policy through a strategic indicator that consists of assessing, using an index, the number of actual or potential incidents and the actual or potential severity they may have had in the company:



Incident Severity Rate

Year	CTLpack Vichy	CTLpack Vitoria	Total
2017 Res.	0.086	0.478	0.260
2018 Res.	0.106	0.338	0.222
2019 Res.	0.267	0.287	0.268
2020 Res.	0.195	0.150	0.150
2021 Res.	0.160	0.169	0.169
2022 Res.	0,261	0.171	0,187
2023 Res.	0,159	0,187	0,168
2024 Obj.	0,194	0.181	0,179



Number of hours in training or awareness-raising initiatives in Health and Safety matters

Year	CTLpack Vichy	CTLpack Vitoria	Total
2017 Res.	407	116	552
2018 Res.	600	250	866
2019 Res.	303	165	694
2020 Res.	357	2	375
2021 Res.	674	139	813
2022 Res.	1094	198	1292
2023 Res.	676	200	876
2024 Obj.	676	202	878

In relation to the **Customer**, we know it is necessary to carry out satisfaction surveys in order to carry out diagnoses that allow us to launch appropriate actions and help us to focus our CSR strategy.

The health and safety of our customers and consumers with regard to the products we manufacture and supply is guaranteed through the "List of legal requirements applicable to articles" procedure, which includes all the regulations applicable to the

raw materials/components used in the manufacture of the products, and which is completed by the suppliers of the raw materials/components for approval.

To this end, the CTLpack Group has a procedure for analysing Products (raw materials/components for the manufacture of tubes), the requirements of which are defined in the "Project Input Elements" form:

- **Technical requirements:** the technical characteristics of the raw materials/components are defined, e.g. technical drawings, materials, functionalities, etc.
- **Control requirements:** this section defines all that is required of the raw materials/components in terms of quality.
- **Environmental, health and safety requirements:** Technical Data Sheets and Safety Data Sheets for the raw materials/components to be developed. Environmental improvement achieved: quantifies whether an environmental improvement is expected in the development
- **Legal and regulatory requirements:** the Supplier is asked to fill in the "List of legal requirements applicable to articles" form, which includes all the regulations applicable to raw materials/components.
- **Purchasing and Service Requirements:** definition of everything related to the supply of raw materials/components.

In relation to **suppliers**, they are evaluated annually within our quality system, which includes aspects linked to Human Rights. In order to be able to carry out this evaluation with defined criteria, our Code of Ethics is sent in advance, which sets out our guidelines in this area.



Percentage of suppliers who are informed about our code of ethics

Year	CTLpack Vichy	CTLpack Vitoria	Total
2020 Res.	100%	100%	100%
2021 Res.	100%	100%	100%
2022 Res.	100%	100%	100%
2023 Res.	100%	100%	100%
2024 Obj.	100%	100%	100%

At present, our supplier classification is based on the annual review of their delivery of complete material, with the agreed quality, on the agreed date and the CSR assessment.








Since 2021, CSR aspects have been integrated into the evaluation of suppliers by including environmental, energy management, health and safety and quality concepts in order for the CTLpack Group to meet its objectives through its suppliers. Supplier performance indicators have been included in this field.



Supplier Assessment for CSR Results

Year	CTLpack Vichy	CTLpack Vitoria	Total
2020 Res.	NA	NA	NA
2021 Res.	14.2/20	14.4/20	14.3/20
2022 Res.	Monitoring	Monitoring	Monitoring
2023 Res.	Monitoring	Monitoring	Monitoring
2024	55.7/100 *New criterion: Average according to CSR questionnaire		

7.1.4 Actions

ACTIONS	Stakeholder
 Information on the protocol for reporting breaches of the code of ethics.	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers
 Internal training about the concept and scope of CSR.	<input checked="" type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers
 Extraordinary investments for the adaptation of machines with increased risk to the health and safety of people working on these machines.	<input checked="" type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers
 Knowledge of the needs of end consumers and our own customers in terms of their needs and expectations in packaging, and especially the tube, in order to be able to proactively provide our customers with greater knowledge of the market.	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers
 Conducting a work climate survey - CTLpack Vichy - CTLpack Vitoria	<input checked="" type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers
 Updating the equality plan	<input checked="" type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers
 Integration of CSR concepts in the evaluation of suppliers. Analysis of the results.	<input type="checkbox"/> Employees <input type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers

*In green, actions carried out in the previous year

7.2 Labour Standards

P3

Companies must support freedom of association and the effective recognition of the right to collective bargaining.

P4

Companies must support the elimination of all forms of forced and compulsory labour.

P5

Companies must support the eradication of child labour.

P6

Companies must support the abolition of discriminatory practices in employment and occupation.

7.2.1 Sustainable Development Goals 1, 3, 4, 5, 8, 10, 16

Within the Labour Standards principle, the following SDGs have been identified in relation to the CTLpack Group's activity.



3 Good health and well-being



4 Quality education



5 Gender equality



8 Decent work and economic growth



10 Reduced inequality



16 Peace, Justice, and Strong Institutions

7.2.2 Policies



We have working conditions agreed with the legal representation of workers that foster relations between the organisation and the people, that respect freedom of association and the effective recognition of the right to collective bargaining, and that provide for established working hours, timetables, workers' remuneration and social benefits.

Also, in each employment contract we reflect the agreed working hours, the remuneration according to the corresponding job category or position and the social benefits to which every person in the company has access. We also refer to the conditions set out in the general company agreement, as a reference for employees.

We hold regular meetings with employee representatives, as well as whenever circumstances make it advisable to consult with employee stakeholders beyond the minimum legal requirements.

- General Meetings with the legal representation of workers. Minutes of meetings and Memoranda with the agreements adopted.
- Annual meetings with management and with Staff for information and communication of the main issues relating to the company's progress.
- Meetings with managers. Monitoring and evaluation reports.
- Collective communication systems: notice boards, corporate mail, intranet, etc.

The working conditions agreements of the companies that make up the CTLpack Group are negotiated and agreed with the legal representatives of the employees. Together with HR, these representatives verify compliance with the above-mentioned company agreements as well as the CSR conditions related to the above-mentioned principles. In the event of an incident, an internal communication is made, which is recorded in the form of minutes (content of the incident, resolution, persons responsible, etc.).

The minutes of meetings and all agreements adopted by mutual agreement with the legal representatives of the employees are recorded in an internal database and are also communicated globally to the entire workforce, thereby becoming part of the Company's internal rules.

In addition, a number of direct communication channels are maintained with all staff joining the organisation on their arrival: direct meetings with the manager and workers' legal representatives, internal email, memos, collective meetings with management and general workers' meetings.

Recruitment in the company, both national and international, is governed by the regulations in force in the European Union on the minimum age of 18 years for access to the labour market. We exclude the possibility of employment contracts with persons over 16 years of age with the authorisation of their legal representative.

We promote a policy of maintaining a stable workforce. Currently, less than 2% of the people in the organisation find themselves in a contingency situation.



Our general policy encourages in-house work on added value ancillary processes.

This policy enables us to maintain and develop a high level of knowledge and know-how both in our company and in our environment.

Some examples of such a policy would be:

- Formulation of our inks and dyes
- Manufacture of 80% of our caps
- Metallisation of our caps.
- Manufacture of our printing plates
- Printing our own laminates.

We maintain annual agreements with training centres for the incorporation and work experience of students in a dual format.

The company has a policy of collaboration with training centres and foundations that promote and facilitate the hiring of young people for professional placements, in order to encourage employment and the integration of new graduates into the labour market.

An example of the above would be the completion of a Vocational Qualification certification in France.



Likewise, in Vitoria over the period 2022-2023, coverage was provided to 3 graduate students who carried out their work experience and 4 students undertaking DUAL training plans.



The knowledge of **employees** is the company's greatest capital and is constantly changing. The globalisation of markets and the emergence of new technologies nowadays require continuous investment in the organisation's most important resource. Training motivates employees, attracts and retains talent, and is a factor that influences the quality of the services offered.

The CTLpack Group encourages all employees to actively participate in the training plans designed for each level, in order to promote their professional progress. Those in management positions should also encourage the professional development of their staff, in a way that fosters their professional and technical growth within the company.

To achieve this, CTLpack has a stable Training Plan that is drawn up periodically and systematically, and after carrying out a series of interviews or a diagnosis of the organisation's needs, the information gathered is then reflected in the training plan, which aims to meet the future challenges and strategic vision of the company.

In this way, each training activity carried out is obliged to collect information on:

- What is the origin of the need for training.
- The general objectives defined in terms of skills.
- The training content.
- Financial resources for its implementation (if determined).
- Priority for the company.



The CTLpack Group is governed by the set of values and principles of action set out in its Code of Ethics, which constitutes the guide for the actions of both the organisation's professionals and its directors.

Firstly, the document refers to respect for people, indicating that CTLpack rejects any manifestation of physical, sexual or moral harassment or abuse of authority, as well as any other conduct that could generate an intimidating or offensive environment for people's rights. It also states that CTLpack Group employees must treat each other with respect, fostering cordial relations and a pleasant, healthy and safe working environment.

According to the Code of Ethics, management is committed to investigating all allegations of harassment and a procedure is established to resolve various disputes. This procedure guarantees objectivity, the right to privacy and the confidentiality of the subjects dealt with and of the people involved.

Each person has the right to invoke these procedures with guarantees that he or she will not be subjected to intimidation, unfair, discriminatory or unfavourable treatment. Such protection shall be extended to every person involved in the procedures. Furthermore, everyone has the right to their presumption of innocence and to their right to honour and to their image, and therefore false allegations will not be tolerated.

Conduct constituting harassment is considered very serious misconduct, and any such conduct is punishable, depending on the seriousness of the facts, by suspension of employment and pay or even disciplinary dismissal.

Conduct constituting harassment is considered very serious misconduct, and any such conduct is punishable, depending on the seriousness of the facts, by suspension of employment and pay or even disciplinary dismissal.

Moreover, it is a basic principle for CTLpack that the principle of equal treatment and equal opportunities at work is complied with in all respects and in all areas. The organisation is committed to the fight against discrimination in any form, whether direct or indirect, and therefore do not accept discrimination on grounds of sex, marital status, age (within the limits set by law), race, social status, religious or political beliefs, membership or non-membership of a trade union, etc.

The work-life balance of “**Employees**” is a fundamental aspect of the relationship between the company and its employees, the measures implemented in this respect are geared towards maximising the well-being of the workforce, with the aim of obtaining a return in terms of retaining talent and motivating workers.

The CTLpack Group has developed a number of social benefits specifically targeted at the “**Employees**” stakeholder group, improving their quality of life, as well as the perception that this stakeholder group has of the organisation:

Principle 3	Principle 4	Principle 6
Communication sessions	Scholarships for the training of workers' sons/daughters	Prioritising internal promotion
Organisation of informational meetings for all staff regarding diet and sleep	Adapted schedules for pregnant women who work 3 shifts.	Work with mentally handicapped people to support their integration into the workplace
Visits of family members to the Company	Establishment of a room that promotes rest and relaxation.	School visits to see the company
Christmas drawing competition for employees' children	Sick leave allowance	Collaboration with training centres for student work experience in the company
Blood donation campaign on company premises during work time	Paid leave to deal with situations of need on behalf of family members or for medical reasons.	Training programme alternating between the company and the vocational training centre for the reincorporation of young people into the workplace.
In-house Medical Service	Flexible working hours that allow for work-life balance	Employment of disabled people higher than the legal level (12% in CTLpack Vichy instead of 6%).
	San Prudencio Employment Foundation with a range of support services	2 mentors in CTLpack Vichy to accompany people with physical limitations.
	Subsidised cafeteria	
	Subsidised transport	
	Relief Contract	
	Pension Plan	
	Health Insurance	
	Life Insurance	
	Competitive wages in the sector	
	In cases of temporary incapacity resulting from common illness and non-occupational accident, wages shall be supplemented up to 100% of gross pay through provisions from a common fund.	

The CTLpack Group has developed a series of social benefits specifically aimed at its employees, with the aim of improving the quality of life and the perception this stakeholder group has of the organisation:

Staff under the Collective Bargaining Agreement are covered by a collective insurance policy covering the following contingencies:

- Death, death due to accident or traffic accident, total and permanent professional incapacity, etc.
- The employee is granted paid leave with payment of full salary in cases of:
 - Marriage or common-law couple.
 - Childbirth.
 - Serious illness of close relatives with medical certificate from a doctor.
 - Death of close relatives.
 - Moving home.
 - Time needed to visit the doctor.
 - All children of employees of the organisation who are in secondary, professional or university studies are eligible for a grant.
- In cases of temporary incapacity resulting from common illness and non-occupational accident, wages shall be supplemented up to 100% of gross pay through provisions from a common fund.
- The employees of the organisation have the right to effective occupational health and safety protection and are obliged to observe the existing legal and regulatory measures in this field.

With regard to **suppliers**, through our Code of Ethics, we insist on not allowing behaviour involving forced or compulsory labour, as well as support the elimination of child labour and the abolition of discriminatory employment practices.

7.2.3 Diagnosis, monitoring and measurement of impacts

With regard to **Employees**, we have a formal procedure for managing the performance and evaluation of people based on their skills, potential and/or professional and personal projection, which must respond to the expectations of people's professional growth, as well as to the coverage of future needs for the organisation of the company.

We have no risk of employing persons under the legal age. For each new hire, we verify through the identification of the person and an initial medical examination that all of the company's national and international employees are of legal age at the time the employment relationship is formalised.



At CTLpack Group, we continue to strive for the integration into our work systems of ways of not only avoiding possible situations of discrimination based on sex, but also guaranteeing and promoting real and effective equality for all staff.

We know that equality is a fundamental value, and it must be embraced on a daily basis by everyone in our community; working from the perspective of equal treatment is essential

for a positive working environment and for improving the competitiveness of the organisation. It is, therefore, the responsibility of everyone in the company to ensure that this principle is complied with.

On the basis of the above, CTLpack is negotiating the 3rd Equality Plan to be extended to the entire organisation through the Negotiating Committee made up of representatives of the social aspect as well as representatives of the company.

Our goal with this plan is to continue to create a better everyday life for all people and to set an example for other companies and be agents of change to identify CTLpack as a great place to work.

CTLpack Vichy

P6



Women/men equality index

Legal target 75/100

Year	2019 Res.	2020 Res.	2021 Res.	2022 Res.	2023 Res.	2024 Obj.
Results	84/100	99/100	92/100	86/100	87/100	90/100



Staff by age and gender

	CTLpack Vichy		CTLpack Vitoria		Total	
	Men	Women	Men	Women	Men	Women
> 50 years	63	21	130	13	193	34
30 - 50 years	58	36	118	46	176	82
< 30 years	15	12	11	3	26	15
TOTAL	136	69	259	62	395	131



Female employees as a percentage of the whole organisation

Year	CTLpack Vichy	CTLpack Vitoria	Total
2020 Res.	32%	NA	NA
2021 Res.	32%	22%	25%
2022 Res.	33%	24%	26%
2023 Res.	34%	19%	24%
2024 Obj.	33%	20%	24,5%



Percentage of women in managerial positions

No. of women in management positions / total management positions

Year	CTLpack Vichy	CTLpack Vitoria	Total
2020 Res.	28%	NA	ND
2021 Res.	28%	13%	ND
2022 Res.	43%	13%	ND
2023 Res.	33%	13%	ND
2024 Obj.	50%	13%	ND



Staff by type of contract

As at 31/12

	CTLpack Vichy		CTLpack Vitoria		Total	
	Men	Women	Men	Women	Men	Women
Full-Time Permanent	128	68	259	62	387	130
Part-time Permanent	2	0	0	0	2	0
Full-time Temporary	6	1	0	0	6	1
Part-time Temporary	0	0	0	0	0	0
TOTAL	136	69	259	62	395	131



Percentage of vulnerable workers employed in relation to the entire organisation

Year	CTLpack Vichy	CTLpack Vitoria	Total
2020 Res.	11%	NA	NA
2021 Res.	15%	15%	15%
2022 Res.	12%	11%	12%
2023 Res.	10.45%	2%	
2024 Obj.	10%	2%	



Average hours of training per employee

Year	CTLpack Vichy	CTLpack Vitoria	Total
2020 Res.	28	ND	ND
2021 Res.	20	ND	ND
2022 Res.	28	1.3	12
2023 Res.	28	4	
2024 Obj.	28	5	

As regards communication, the company's accounts are provided to the workers' representatives on an annual basis together with a detailed explanation, together with answers to any questions that are asked.

These accounts are public and registered with the Commercial Register.

In addition, a quarterly detailed report is also provided on the performance of the company, commercial and customer aspects, recruitment of staff,

as well as interim accounts for each quarter.









In relation to **Suppliers** and **Customers**, we have disseminated information to our supply chain on good working conditions and the absence of forced labour through our code of ethics.

With regard to **Suppliers** working at our sites, the system monitors compliance with this principle.



7.2.4 Actions

ACTIONS	Stakeholder
 <p>Implement the actions derived from the Equality Plan. The following are noteworthy initiatives</p> <ul style="list-style-type: none"> - improving the level of professional training of women in the manufacturing process - improving working hours and working systems, in order to reconcile family needs with professional obligations. - awareness-raising in the field of gender equality for managers and workers in general. 	<input checked="" type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers
 <p>Developing new lines of communication and information with people, including feedback to management. Communication Plan focusing on transparent information exchange and communication between people and management.</p>	<input checked="" type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers
 <p>Understanding the expectations of 2/3 of the most aware customers in this field of CSR, in order to determine how to respond to the challenge of becoming a more recognised supplier in this field.</p>	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers
 <p>Incorporating the CSR policy formally into management systems and internal communication protocols to encourage support from the employee stakeholder group, in collaboration with the Company.</p>	<input checked="" type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers
 <p>Review and update of the CTLpack Group Code of Ethics</p>	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers
 <p>Definition and rollout of access to the CTLpack Group whistleblowing channel</p>	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers

*In green, actions carried out in the previous year

7.3 The Environment



P7

Companies should maintain a preventative approach that favours the environment.

P8

Companies should encourage initiatives that promote greater environmental responsibility.

P9

Companies should encourage the development and dissemination of environmentally friendly

7.3.1 Sustainable Development Goals 6, 7, 9, 11, 12, 13, 15, 17

Within the Environment principle, the following SDGs have been identified in relation to the CTLpack Group's activity.

<p>6 AGUA LIMPIA Y SANEAMIENTO</p>	<p>7 ENERGÍA ASEQUIBLE Y NO CONTAMINANTE</p>	<p>9 INDUSTRIA, INNOVACIÓN E INFRAESTRUCTURA</p>	<p>11 CIUDADES Y COMUNIDADES SOSTENIBLES</p>
<p>6 Clean water and sanitation</p>	<p>7. Affordable and clean energy</p>	<p>9. Industry, innovation, and infrastructure</p>	<p>11 Sustainable cities and communities</p>
<p>12 PRODUCCIÓN Y CONSUMO RESPONSABLES</p>	<p>13 ACCIÓN POR EL CLIMA</p>	<p>15 VIDA DE ECOSISTEMAS TERRESTRES</p>	<p>17 ALIANZAS PARA LOGRAR LOS OBJETIVOS</p>
<p>12 Responsible consumption and production</p>	<p>13 Climate action</p>	<p>15 Life on Land</p>	<p>17 Partnerships for the Goals</p>

7.3.2 Policies



The CTLpack Group is committed to protecting the environment, reducing environmental impacts, in partnership with customers, suppliers and stakeholders.

Our management system has been ISO 14001 certified since 2011 in the group's companies and as certified companies, all our internal policies and procedures are geared towards environmental protection throughout the entire production, supply and waste management chain.

Within our environmental management system, which consists of a general procedure, various processes, records and

monitoring documentation, we include the following environmental monitoring aspects: Natural Resources Management, Control of Contracts-Subcontracts, Waste Management, Hazardous Waste Management, Environmental Communication, Identification and Assessment of Environmental Matters, Identification and Assessment of Legal Requirements and Environmental Emergencies and response capacity.

CTLpack Group companies have management procedures that regulate the control of atmospheric emissions generated as a result of the activities and operations carried out in each of the plants.

Our environmental strategy and policy have been developed based on a thorough analysis of our stakeholders. As a result of this analysis, and in order to comply with our Environmental Policy, 5 key areas of work have been defined.

Legislation	Monitor, Evaluate, Implement and Enforce
Suppliers	Engage, Sustainable, Evaluate
Employees	Train, Evaluate, Raise Awareness
Production processes	Reduce emissions, Use natural resources sustainably, Minimise, Valorise and Recycle waste
Design	Develop raw materials, products and processes taking into account the Life Cycle.

As examples that demonstrate our commitment to environmental improvement in development and management, we would highlight the following:



Our commitment to sustainability began more than 15 years ago, in 2006, with the design of the Positop cap that reduced the weight of one of the most widely used caps in the tube world by 35%.

Following on from this, in 2009, CTLpack worked on the eco-conception of moulds for light caps, always with a view to improving the product in terms of sustainability, until the manufacture of our Eco -f tube, 28% lighter than a standard tube, and the Minitop cap (with an 8.5% weight reduction).

Meanwhile, we continue to work on other actions to make CTLpack a more sustainable company by reducing volatile organic compounds since 2008 (56%) and reducing electricity consumption in our plants by 2M Kw per year. As can be seen in the chapter on CO2 Emission / Product Quantity (Kg), we have also achieved a decrease of CO2 through different procedures.

We also accept the challenge of changing from a linear manufacturing model to a circular one, integrating bio-based, PCR and ISCC+ materials into our materials and focusing on recyclability with mono-material products, replacing ABL multilayers with PBL and carbon black-free colourants.

Our commitment is further endorsed by the integration of design guidelines and recycling assessments within product development since 2020 and by obtaining recyclability certifications for our tubes.

Our plants have been assessed by EcoVadis since 2017, always achieving the gold category and in 2022 they achieved the Platinum medal.

7.3.3 Diagnosis, monitoring and measurement of impacts



P8

The CTLpack Group monitors its main consumptions to determine which of these have a significant impact on the environment.

The environmental aspects that are taken into account and for which monitoring and measurements are carried out in the group are the following.

Non-Hazardous Waste	Paper, Cardboard, Wood, Batteries, Rubbish...
Hazardous Waste	Batteries, Aerosols, Electronics, Absorbents, Cleaning products, solvents, sludges...
Consumption of Materials	Varnishes, PP, PE, Laminates, Caps, Sleeve...
Energy Consumption	Water, Electricity, Propane, Butane, Gas, Diesel
Transport	Professionals, dispatches, receptions
Noises	
Soils	Pollution
Discharges into water	Sanitary / storm water
Atmospheric emissions	CO, NOX, SO2, COT...
Incidents / Emergencies	Fires, Explosions, Legionella, Gases...

As a consequence of Royal Decree 56/2016, CTLpack Vitoria carries out periodic energy audits and the last one carried out in 2019 showed improvements in the reduction of energy consumption and the reduction of CO2 emissions due to the reduction of the electricity mix.

CTLpack have management procedures that regulate the control of atmospheric emissions generated as a result of the activities and operations carried out in each of the plants.

The systematic sources of atmospheric emissions identified in each of them and their main pollutants are:

7.3.3.1 Examples of consumption



Electricity in Kw/h

Use for lighting, production lines, air conditioning and other auxiliary services (compressed air, etc.)

Year	CTLpack Vichy	CTLpack Vitoria	Total
2017 Res.	7,438,154	10,312,483	17,750,637
2018 Res.	7,500,619	10,241,978	17,742,597
2019 Res.	7,456,718	9,510,898	16,967,616
2020 Res.	6,845,206	10,101,488	16,946,694
2021 Res.	7,540,537	10,901,472	18,442,009
2022 Res.	7,748,288	11,651,236	19,399,524
2023 Res.	7,648,809	10,586,808	18,235,617
2024 Obj.	Insignificant	Insignificant	Insignificant



Natural Gas in Kw/h

Use for heating and domestic hot water

Year	CTLpack Vichy	CTLpack Vitoria	Total
2017 Res.	0	1,208,932	1,208,932
2018 Res.	0	1,353,914	1,353,914
2019 Res.	0	1,242,251	1,242,251
2020 Res.	0	1,281,131	1,281,131
2021 Res.	0	1,469,681	1,469,681
2022 Res.	0	1,194,430	1,194,430
2023 Res.	0	1,103,306	1,103,306
2024 Obj.	Insignificant	Insignificant	Insignificant

At CTLpack Vichy, the heat energy generated by the machines is recovered, so there is no need for supplementary energy for heating.



Water in m3

Mainly for sanitary and production uses

Year	CTLpack Vichy	CTLpack Vitoria	Total
2017 Res.	2,870	9,187	12,057
2018 Res.	1,924	6,877	8,801
2019 Res.	3,853	6,912	10,765
2020 Res.	4,377	8,636	13,013
2021 Res.	3,944	9,233	13,177
2022 Res.	4,407	11,230	15,537
2023 Res.	5,225	9,936	9,936
2024 Obj.	Insignificant	Insignificant	Insignificant

The CTLpack Group is aware of the importance of using such a valuable resource as water as efficiently as possible. For example, the water consumed in irrigation at CTLpack Vitoria has been optimised as a measure aimed at reducing consumption, and awareness-raising campaigns are being conducted at CTLpack Vichy.

Wastewater discharges are classified as stormwater, sanitary and industrial. Industrial water is periodically monitored, sometimes by the plant itself, by means of self-monitoring requested from authorised control bodies or by means of controls carried out by the actual Authorities.



Paper (Kg).

Office and production documentation use

Year	CTLpack Vichy	CTLpack Vitoria	Total
2017 Res.	1,208	2,471	3,679
2018 Res.	1,312	2,220	3,532
2019 Res.	1,315	2,090	3,405
2020 Res.	999	1,400	2,399
2021 Res.	1,396	2,065	3,461
2022 Res.	1,415	1,379	2,794
2023 Res.	910	1,550	2,460
2024 Obj.	Insignificant	Insignificant	Insignificant

A digitalisation plan is underway to improve this aspect.



Total weight of the hazardous waste emitted (kg).

Year	CTLpack Vichy	CTLpack Vitoria	Total
2020 Res.	31,363	84,583	115,946
2021 Res.	27,745	88,100	115,845
2022 Res.	27,111	92,594	119,705
2023 Res.	22,404	93,557	115,961
2024 Obj.	Monitoring	Monitoring	Monitoring

All CTLpack plants have the necessary authorisations as non-hazardous waste producing activities, and comply with the various periodic reporting obligations to the Administration, as established in the waste regulations.

In this regard, it should be noted that CTLpack Vitoria is authorised as a Hazardous Waste generator. In 2023, the Business Plan for the Prevention of Packaging Waste (PEP for its acronym in Spanish) concluded and the new 2024-2028 plan is being defined, which includes a series of prevention indicators and measures adopted to achieve the objectives. It also conducts annual monitoring through the Hazardous Waste Inventory.

For waste management, CTLpack Vitoria has a Minimisation Plan with planned measures and monitoring of the KPIs for the period 2021-2024.

CTLpack Vichy is also authorised for the production of hazardous waste, in accordance with the resolution obtained for the authorisation of the plant's activity.



Total weight of the NON-hazardous waste emitted (kg).

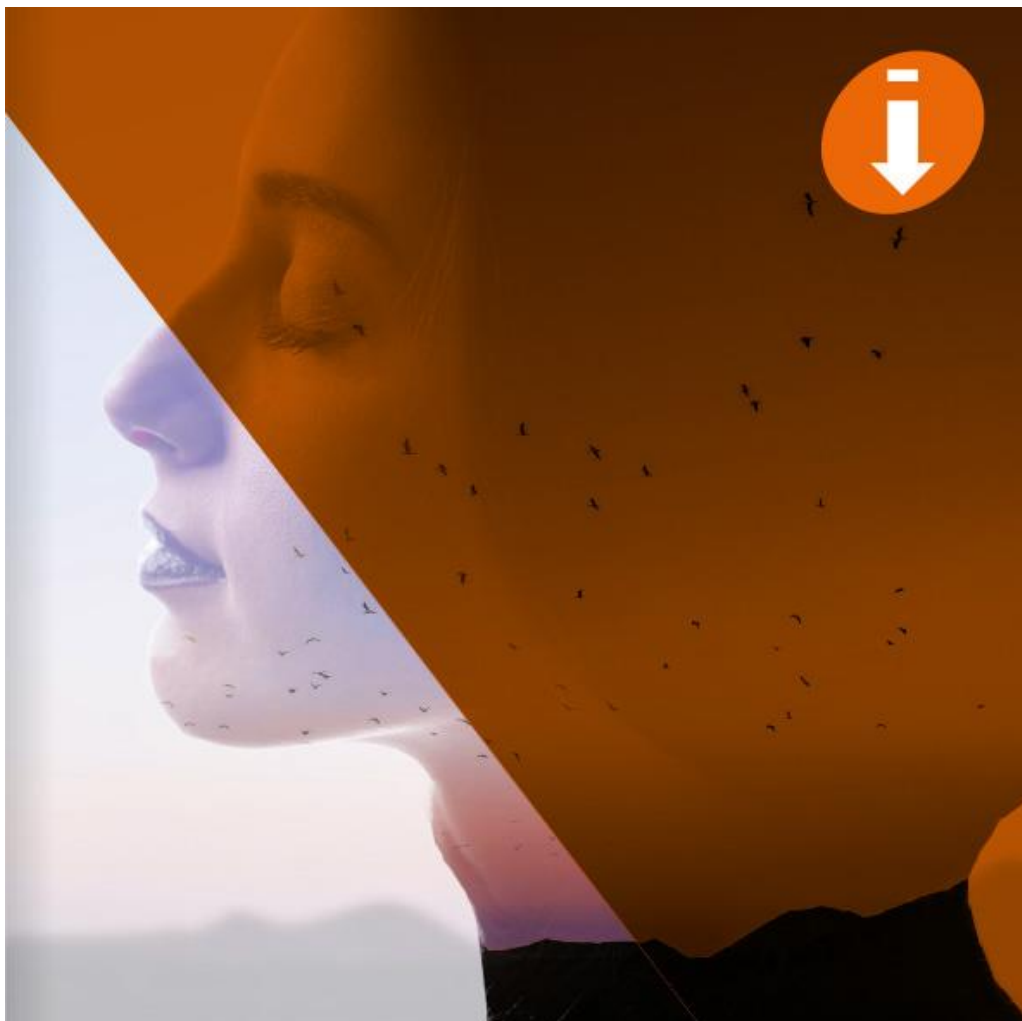
Year	CTLpack Vichy	CTLpack Vitoria	Total
2020 _{Res.}	307,683	616,653	924,336
2021 _{Res.}	276,050	655,885	931,935
2022 _{Res.}	197,357	716,731	914,088
2023 _{Res.}	4116.524	844,305	1,260,829
2024 _{Obj.}	Monitoring	Monitoring	Monitoring



All CTLpack plants have the necessary authorisations, as non-hazardous waste producing activities, and comply with the various periodic reporting obligations to the Administration, as established in the waste regulations.



Due to the diversity of their environmental impact, each company manages its targets and indicators according to the environmental impact assessment procedure. The most significant impacts are addressed in the objectives and indicators shown below.



7.3.3.2 Significant Environmental Aspects

CTLpack Vichy

Type	Issues	Target
Consumptions	Energy	Optimisation of the compressor management programme Screw extrusion insulation study Lighting - Switching to LEDs with presence detectors
Atmospheric emissions	Business-related travel	Remote working agreement Management of group travel by company car.
Hazardous waste	Solvents	Modification of inks to limit cleaning. Work on screen printing and offset machines downtime to reduce cleaning (maintenance, transfer of production to new machines, new printing blankets, etc.). Training plan to improve control of adjustment phases and limit losses.
Consumptions	Energy	Optimisation of the compressor management programme Screw extrusion insulation study Lighting - Switching to LEDs with presence detectors

CTLpack Vitoria

Type	Issues	Target / actions
Consumption	Polypropylene	Reduce waste by 2%. Actions in cap injection <ul style="list-style-type: none"> Improved loss control New moulds
Hazardous waste	Cloths and papers impregnated with pollutants	No specific actions due to the need to improve the overall cleanliness of the plant.
Hazardous waste	Varnish residues	10 % reduction ratio
Hazardous waste	Aqueous cleaning liquids	Reducing the flow rate and avoiding leaving it on when it is not necessary.
Consumptions	Energy	Replacement of chillers and lighting fixtures
Atmospheric emissions	Fluorinated gas atmospheric emissions	No actions defined in the short term. Long term. Replacement of chillers to avoid gas leaks.

7.3.3.3 Carbon Footprint Balance



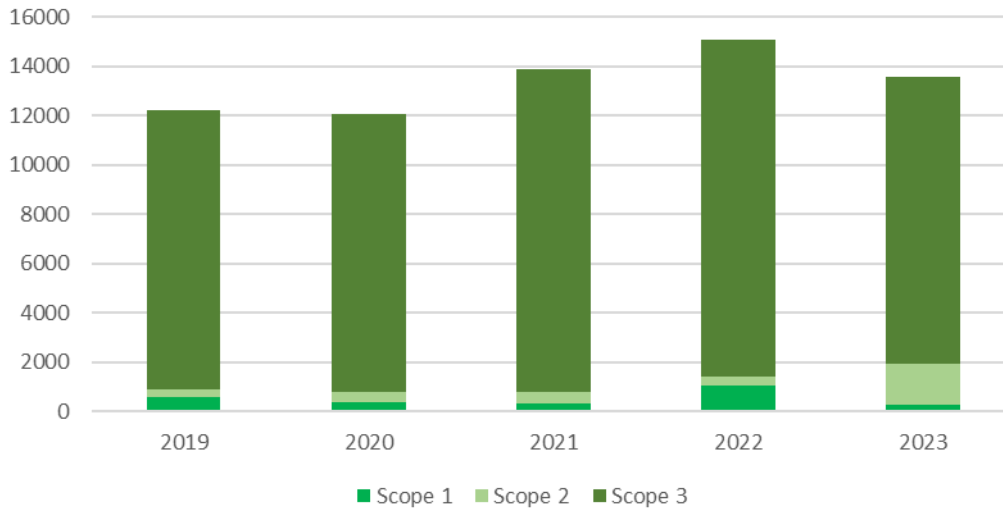
Since 2017, and as a result of its environmental policy to reduce the environmental impacts of its activity, the CTLpack Group has defined an objective to reduce CO₂ by measuring emissions.



Impact on Global Warming - Carbon Footprint - Total Emissions

CF (TCO ₂ Eq)	CTLpack Vichy			CTLpack Vitoria			Group		
	2021	2022	2023	2021	2022	2023	2021	2022	2023
SCOPE 1	6	302	30	336	718	232	341	1,020	262
SCOPE 2	452	402	398	0	0	1,247	452	402	1,645
SCOPE 3	2,735	3,320	3,029	10,345	10,307	8,645	13,080	13,626	11,675
TOTAL	3,193	4,025	3,457	10,681	11,024	10,125	13,873	15,049	13,582

Emissiones HC por Scope (TCO₂Eq)



The scope of the emission measurement has been defined as follows:

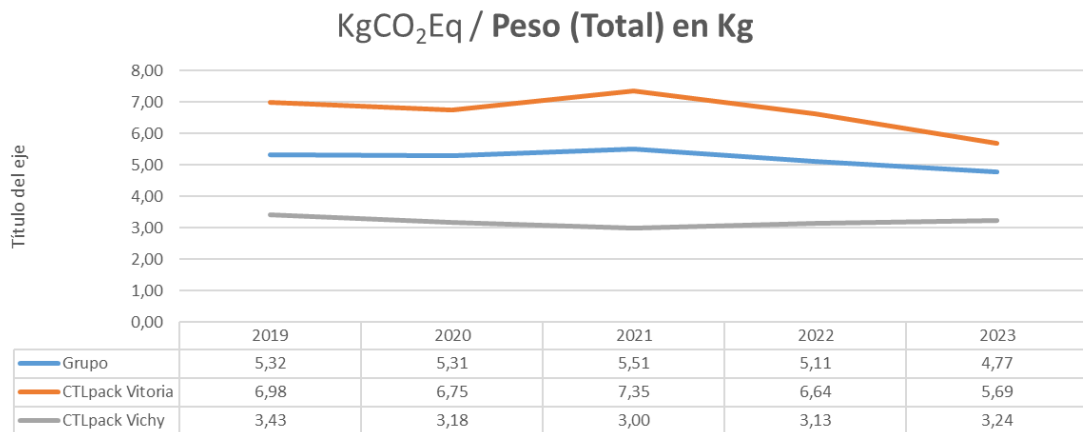
Scope 1	Fossil fuels Emissions of fluorinated gases
Scope 2	Electricity consumption - Electricity Mix
Scope 3	Items such as packaging, raw materials, procured items Waste Transports, receptions and dispatches Professional and personal travel Office and water consumption.



CO2 Emissions / Quantity of Product (Kg)

Carbon Footprint emissions have evolved as follows:

Year	CTLpack Vichy	CTLpack Vitoria	Total
2018 Res.	3.72	7.63	5.77
2019 Res.	3.43	6.98	5.32
2020 Res.	3.18	6.75	5.31
2021 Res.	3.00	7.35	5.51
2022 Res.	3.18	6.64	5.11
2023 Res.	3.24	5.69	4.77
2024 Obj.	3.10	5.50	4.50



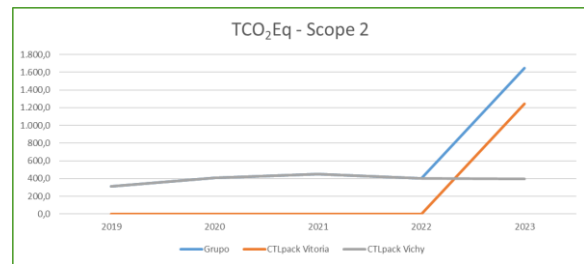
At the level of the Carbon Footprint balance of the plants, we can conclude that:

CTLpack Group

- ↑ In 2023, the environmental impact (+300%) of Scope 2 increased drastically due to Vitoria's electricity mix. It stopped buying 100% green energy, thus generating an extra 1,242 TCO₂eq vs. the year before at group level.
- ↓ In 2023, reduction of the impact of fuel consumption and control of gas leakage with 758 TCO₂eq.
- ↓ In 2023, reduction of the impact of 1,377 TCO₂eq, mainly due to transport, and above all to the way in which information can be obtained more adequately and reliably.
- ↓ **In total, in 2023, decreased impact of 1,467 TCO₂eq (vs 2022) despite the impact of Vitoria's electricity mix and the best result of the KgCO₂Eq per Kg of product indicator since 2018.**

CTLpack Vitoria

- ↑ In 2023, the environmental impact of Scope 2 increased drastically due to Vitoria's electricity mix. It stopped buying 100% green energy, generating +1,247 TCO₂eq (a 12.3% global impact compared to 0% in 2022).



- ↓ The main improvements in 2023 are as follows:
 - Scope 1: 486 TCO₂eq reduction in fuel consumption and no gas leakage.
 - Scope 3:
 - 429 TCO₂eq reduction in raw materials (lower overall consumption and increased use of sustainable materials).
 - Decrease of 1,140 TCO₂eq in transport, but probably due to improved data reliability.
- ↓ **In total, in 2023, decreased impact of 899 TCO₂eq (vs 2022) despite the impact of Vitoria's electricity mix and the best result of the KgCO₂Eq per Kg of product indicator since 2018.**

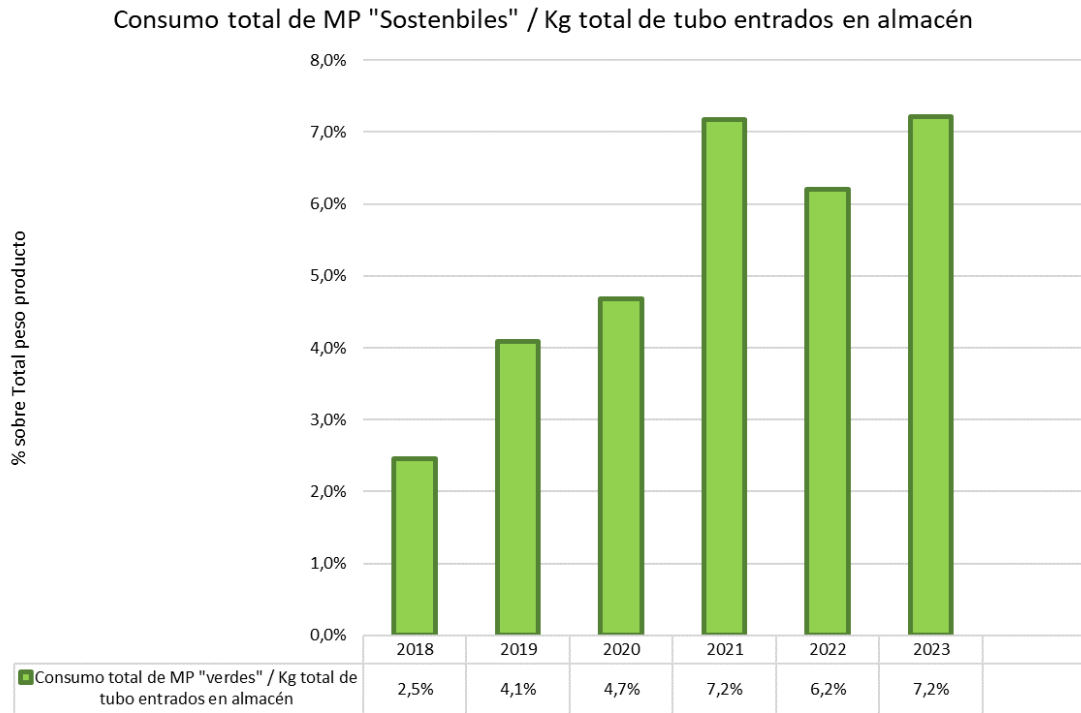
CTLpack Vichy

- ↓ CTLpack Vichy has reduced emissions in absolute terms across all scopes in 2023, accumulating savings of 568 TCO₂eq (vs. 2022).
- ↑ However, the ratio of absolute emissions / kg of tube produced has risen due to low activity in 2023.



Total weight of "sustainable" material consumption / Product Quantity (Kg)

In the CTLpack Group, bio-based materials and mechanically and chemically recycled materials are considered sustainable materials.



After 4 years of growth (2018-2021), there has been a stagnation in the consumption of "Sustainable" materials, although a more detailed analysis of this data shows a progressive change from 2021 in the consumption of bio-based materials in favour of recycled materials, with the growth of the latter being offset by the loss of the former.

7.3.3.4 Development of Sustainable Packaging Solutions



CTLpack has developed innovative and global packaging solutions that create identity and distinction for its **Customers**, the consumers and society. Its products reflect its commitment to sustainability by offering different options that allow the customer to obtain a tube with a lower environmental impact.

ESTube (Easy Supply Tube)



The ESTube offers considerable advantages in terms of environmental improvements. This tube is a mono-material solution made of polypropylene, a technology that is ahead of recycling trends thanks to the following advantages:

- The sleeve, head and cap are all made of polypropylene, which allows for greater and easier recyclability (up to 99%).
- It is free of adhesives, so the recycled plastic is uncontaminated and generates more value.
- As it is made of polypropylene, it achieves an optimal revaluation of the raw material within the circular economy.
- Lower soldering temperature.
- It meets today's market needs of producing shorter runs and generates less waste and losses.

PCR (Post Consumer Recycled) Plastic Tubes

Optimisation in the use of raw materials such as PE and PP in packaging should be accompanied by the introduction of post-consumer recycled (PCR) and/or post-industrial recycled (PIR) materials. This material, which comes from the recycling of other types of packaging, promotes the circular economy by reintroducing used plastic into the production chain.



In the case of the CTLpack Group, we set targets for the inclusion of these recycled materials in our range of tubes and caps in order to help our customers achieve their sustainability goals.

Use of PCR in

- Caps
 - Heads
 - Sleeve
- ✓ Participation in the circular economy
 - ✓ Collaborating with the objectives of the European circular economy plastics strategy to increase (x4 the incorporation of recycled materials)

Tubes with Green PE Plastic



The most widespread bio-based alternative to fossil-based plastics is the sugar cane alternative.

Its transformation into what is known as green polyethylene allows for a processing similar to traditional materials, but with a reduction in the carbon footprint at source.

Use of Green PE

- ✓ Plant origin (Sugar Cane) instead of fossil.
- ✓ Lower Carbon Footprint impact

Tubes with Circular Materials



As part of its commitment to circularity, CTLpack collaborates with ISCC (International Sustainability and Carbon Certification), a certification system that guarantees the sustainable development of products.

CTLpack has been ISCC plus certified since 2021 to contribute to the implementation of environmentally, socially and economically sustainable production and use of all types of biomass in the global supply chains.

In order to achieve these objectives, we have applied work dynamics in order to:

- Apply social and ecological sustainability criteria
- Control our supply chain without deforestation
- Calculate and reduce greenhouse gas emissions
- Establish traceability in global supply chains.
- Ensure that the entire supply chain is ISCC plus certified

CTLpack can guarantee that certain products comply with these ISCC plus requirements when all materials in the supply chain are ISCC certified, in our case in terms of mass balance.

Tubes with black dye without carbon black.



The NIR Detectable tube uses a new black colourant without carbon black which allows the plastic component material to be identified and sorted for correct recycling in the waste separation and sorting lines.

These dyes have good opacity and retain the same printing characteristics as black with carbon black. It is available for tubes in PE and PP material as well as for caps.

7.3.3.5 Employees, Customers and Suppliers



With regard to the **Employees**, in accordance with our policy, we periodically carry out training, assessments and awareness-raising to adapt our internal activities to environmental regulations and to reduce the impact of our activity, in addition to the initial training that all new employees receive at the start of their employment through the Induction Plan.

More specifically, we raise awareness among all our employees through our permanent recycling and waste separation programmes in all areas of the company, and we aim to contain consumption not only as a cost-saving measure, but also as a collective contribution to environmental protection.

We use specific placards, containers and bins suitable for this purpose and an isolated room identified for use as a container for waste that is hazardous to people and/or the environment.



Number of hours of training or awareness-raising activities on environmental issues

Year	CTLpack Vichy	CTLpack Vitoria	Total
2017 Res.	200	3.5	101
2018 Res.	0	7	23
2019 Res.	0	0	0
2020 Res.	0	40	68
2021 Res.	0	91	91
2022 Res.	124	40	164
2023 Res.	140	150	290
2024 Obj.	140	150	290














With regard to the **Customers**, a prototype has been developed for measuring the carbon footprint of manufactured products.

In the future and thanks to this tool, CTLpack Group will be able to advise its customers on packaging solutions so that they can make objective decisions on the most sustainable products they want to develop.

With regard to our **suppliers**, when developing new materials, we demand that they comply with the regulations in force, both in terms of the environment and the ethical principles of our organisation.

In this approval process, we take into account as a selection criterion, the environmental aspects that we have identified in the evaluation and defined previously (Waste generated, Consumption of Materials and Energy, Transport, Noise, Soil, Discharges to water, Atmospheric emissions, etc.)

7.3.4 Actions

ACTIONS		Stakeholder
Environmental Objectives and Actions		
 Air conditioning system: with regard to the air conditioning installation consisting of air/water cooling units, CTLpack is studying the possibility of replacing them with other more efficient machines (saving energy consumption, reducing emissions and saving money on electricity bills).	<input type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society	
 Installation of photovoltaic generation systems: Exploring the possibility of setting up an installation in order to be able to self-consume part of the energy generated and export the surplus generated.	<input type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society	
 Installation of electric vehicle chargers.	<input checked="" type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society	
 Carbon Footprint environmental aspects: As defined in section 7.3.3.2.	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society	
Strategic objectives – Green DEAL		
 Strategic objective 2021 To offer our Customers a catalogue of plastic-reduced product options.	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers	
 Strategic objective 2025 To offer our Customers a catalogue with fully recyclable product options.	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers	
 Strategic objective 2027 Systematic implementation of Ecodesign in each development.	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers	
 Strategic objective 2027 Implementation of the Product Life Cycle Analysis tool.	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers	
 Strategic objective 2030 To make all the products in our catalogue 100% recyclable.	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers	
Sustainable design of manufactured products, with a view to reducing their weight, the use of recycled materials, mono-material packaging design, and the use of compostable, degradable or bio-based materials.		
 Reduction of materials - Development of new reduced weight caps.	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society	
 Reduction of materials - Reduction of the thickness of the tube sleeves.	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society	
 Reduction of materials - First-use caps with a sticky label to replace the PET sleeves	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society	
 Recyclability - Tube recyclability evaluations and certifications	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers	

		<input checked="" type="checkbox"/> Society <input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society
	Recyclability - Development of single-material laminated tube with PBL complexes with improved sustainability	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society
	Recyclability - Single-material design of our tubes: laminate, sleeve, PE cap.	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society
	Recyclability - Development of dyes without “Black Carbon”.	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society
	Recyclability - Substitution of materials with materials that are not toxic to the environment or human health (PFAS, BPA, CMR, Heavy metals, etc.).	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society
	Use of recycled material - Incorporation of recycled materials (mechanical and circular) in the tubes	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society
	Use of recycled material - Development of a PET-PCR-based tamper-proof system (Plastiband) (30%).	<input type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Society
Our suppliers' involvement in the achievement of CTLpack's Environmental Targets		
	Use of 'road train' type transport. (5 train type trucks = 6 conventional trucks)	<input type="checkbox"/> Employees <input type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers
	Introduction of recycled plastic (RPP) in packaging laminates and straps	<input type="checkbox"/> Employees <input type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers

7.4 Anti-corruption

P10

The companies must work against corruption in all its forms, including extortion and bribery.

7.4.1 Sustainable Development Goals 10, 16

Within the Anti-corruption principle, the following SDGs have been identified in relation to the CTLpack Group's activity.



10 Reduced inequality



16 Peace, Justice, and Strong Institutions

7.4.2 Policies

We comply with national and international regulations and legislation aimed at controlling and suppressing any activities related to corruption in all its forms, including extortion and bribery.

Dissemination of our formal CSR policy which sets out our anti-corruption practices and verification of its dissemination to all stakeholders through the usual means of corporate communication.

The CTLpack group attaches particular importance to defining and monitoring effective anti-corruption and anti-bribery policies. In this respect, the Group companies have a Professional Code of Ethics which, among other things, refers to the following points:

Financial risk management is controlled by the Management and the Financial Departments of the various CTLpack Group companies, which have the necessary mechanisms in place to control exposure to changes in interest and exchange rates, as well as credit and liquidity risks, and seek to identify, evaluate and hedge the financial risks described in accordance with the policies approved by the directors.

The main financial risks impacting the CTLpack Group are:

1. Market risks

Interest rate risk: The interest rate risk of the CTLpack Group companies arises from long-term borrowing, as they are issued at variable rates and expose the companies to cash flow interest rate risk. Fixed-rate borrowing exposes the organisation's companies to interest rate risk on the fair value.

Exchange rate risk: CTLpack Group companies operate internationally and are therefore exposed to foreign exchange risk from currency transactions, especially the US dollar. Foreign exchange risk arises from future commercial transactions, recognised assets and liabilities denominated in a currency that is not the functional currency of the companies comprising the CTLpack Group. In these cases, net same currency exposure and hedging needs are assessed, as well as foreseeable exchange rate developments.

2. Credit risk

Credit risk is managed through the ongoing assessment of the customer's credit quality, taking into account the customer's financial position, past experience and other factors.

3. Liquidity risk

Prudent liquidity risk management is implemented, based on maintaining sufficient cash and marketable securities, the availability of funding through a sufficient amount of committed credit facilities and having the capacity to liquidate market positions. The Management of the CTLpack Group permanently monitors the liquidity reserve forecasts, as well as the net financial debt, based on the real situation at any given time of the items of which it is comprised and the permanent and dynamic review of its expected evolution in the short and medium term for all the organisations that make up the CTLpack Group.

With regard to the fight against corruption and bribery, the CTLpack Group attaches particular importance to defining and monitoring effective anti-corruption and anti-bribery policies. In this respect, it has a Code of Ethics which, among other things, addresses the following points:

Money laundering. CTLpack has adequate procedures and measures in place to prevent irregular payments or the laundering of money from illicit or criminal activities in the course of its activities.

Carrying out specific controls on all transactions of an economic nature, and especially for those which, due to their nature or amount, may be considered unusual, avoiding or especially controlling those carried out in cash, with bearer cheques, or with a destination to bank accounts located in a tax haven, etc.

Employees must pay particular attention to cases where there are any signs of lack of integrity of the people or companies with whom the company has dealings, and must immediately inform the company of any payment about which there are concerns. Special attention is given to extraordinary payments, which are not foreseen in the respective agreements or contracts. Under no circumstances is any kind of collaboration envisaged for activities that could serve as a cover for terrorist or criminal activities.

Bribes, gifts and hospitality. Practices of offering or accepting bribes, or situations that result, as a consequence of the performance of work duties, in personal gain or enrichment, monetary or otherwise, of any person in the organisation, or of facilitating such gain or enrichment of other people, whether or not they are family members, will not be tolerated. It is also forbidden to offer or accept gifts that are disproportionate or out of keeping with custom and practice.

Only gifts or tokens not exceeding an estimated value of €100 may be accepted. In the event that this amount is exceeded, the line manager will be notified and will decide whether or not the gift may be accepted and this decision will then be communicated to the ethics committee.

In the case of gifts or details given by any CTLpack Group company to customers, suppliers or third parties, this must be communicated to the line manager and, if the estimated cost exceeds €100, the ethics committee must be informed, stating the reason for the gift.

Contributions or gifts that are aimed at supporting a charity, foundation or community social event are exempt from these limits, although any participation in social projects must be consistent with the CSR Policy.

Conflict of interest. Conflicts of interest are considered to be all those circumstances where the personal interests of employees, directly or indirectly, interfere with the responsible and ethical fulfilment of their professional duties and responsibilities or involve them personally in any transaction or economic operation of the organisation, its customers or its suppliers.

As mentioned above, we have developed a code of conduct against extortion, bribery or any other type of corrupt behaviour, which we have circulated to our Stakeholders: **Employees, and Customers** when required and to all our **suppliers**.

CTLpack's relationship with its **employees** must be based on loyalty and trust, which is why any situation in which the personal interests of employees, directly or indirectly, through family or friends, could conflict with those of the CTLpack Group must be avoided.

The participation of its employees in other financial and business activities is understood and respected as long as they are legal and do not constitute unfair competition and do not conflict or interfere with the responsibilities, obligations and due dedication to the performance of their work.

The approved Code of Ethics sets out the principles and commitments of business ethics that the CTLpack Group and its people must respect and comply with in the exercise of their activities. Its contents are regularly communicated to all employees, and all those joining the organisation must expressly accept the ethical principles contained in the Code.

With regard to **suppliers**, all contact with these must include a reminder of our policies, as well as annual targets for improvement in areas such as non-approval of ethical code violations (including bribery etc.).

One of the objectives of the CTLpack group is to develop its business activity with a vision of Corporate Social Responsibility, integrating environmental, social, labour, ethical and economic aspects in its activity and interactions with stakeholders.

The fundamental tool on which the relationship with suppliers is based, from a different standpoint to the transactional one, is the Business Review, where, in addition to these transactional aspects, a reminder is always made of the Group's policies, and where annual objectives for improvement are set out in all the sections included. For example, the non-approval of violations of ethical codes and the evaluation of compliance with environmental measures are made explicit.

In this regard, it should be noted that CTLpack has a procedure for the approval of service providers, which aims to ensure that its services meet the requirements of quality, health and safety, environment, legal requirements, as well as taking into account the requirements of Corporate Social Responsibility.

It also has a procedure for the approval of articles, which is aimed at ensuring compliance with the technical requirements and legal requirements, as well as the safety and environmental requirements of the articles procured (purchased from suppliers, supplied by the customer or imposed by the customer) that may have a decisive effect on the quality of the final product.

In addition, and in line with the above, the CTLpack Group companies carry out an evaluation of the suppliers of approved items procured.

In terms of commitment to the engagement of suppliers, it is worth highlighting CTLpack's Code of Ethics, which has the firm objective of establishing the guidelines, values and principles by which the behaviour of the people in the organisation must be governed, with regard to the company's relations with its stakeholders, both in terms of the company's work activity with its employees and its relations with customers, suppliers and external collaborators, shareholders, public and private institutions and society in general.

7.4.3 Diagnosis, monitoring and measurement of impacts

In order to ensure compliance with the Code of Ethics, resolve incidents and queries about its interpretation, and adopt the appropriate measures for better compliance, the Committee for the application and monitoring of the Code of Ethics has been created, as well as a specific and confidential procedure for reporting situations related to corruption. The mission of this committee is to promote the dissemination and application of ethical principles across all the company's activities. It will be composed of the General Management, the HR and IMS departments of each Group company, as well as a representative of the Employees.






Number of confirmed incidents of corruption

P10

Year	CTLpack Vichy	CTLpack Vitoria	Total
2020 Res.	0	0	0
2021 Res.	0	0	0
2022 Res.	0	0	0
2023 Res.	0	0	0
2024 Obj.	0	0	0

7.4.4 Actions

ACTIONS	Stakeholder
 Periodic communication of the existing CSR policy monitoring mechanism, aimed at promoting the reporting, management and redirection of possible incidents that may occur in relations with our stakeholders.	<input checked="" type="checkbox"/> Employees <input type="checkbox"/> Customers <input type="checkbox"/> Suppliers
 Establishment of a reporting channel to prevent breaches of rules and instances of corruption.	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers
 Revision of the code of ethics, integrating privacy and data protection aspects as well as the use of company assets.	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Suppliers

*In green, actions carried out in the previous year




8 ALLIANCES AND ASSOCIATIONS



The CTLpack Group knows the importance of reaching alliances with companies and partners that can contribute to the improvement of its organisation.

Whether or not the companies' expectations are met depends to a large extent on the proper planning and management of these partnerships.

Among the alliances with associations or organisations, some of them local, that they have established, the following are worth highlighting:

CTLpack Company	Alliance	Description
CTLpack Vitoria		<p>San Prudencio Foundation</p> <p>The San Prudencio Employment Foundation is the leading non-profit organisation in the development of Corporate Social Responsibility (CSR) in the companies of Alava.</p>
CTLpack Group		<p>ETMA (European tube manufacturers association)</p> <p>It is an association of producers of flexible aluminium, plastic and laminated tubes for packaging purposes, representing the interests of 46 members from 19 European countries.</p>
CTLpack Vitoria		<p>SEA</p> <p>SEA Empresas Alavesas is a non-profit business association that defends and represents the interests of the business community in Alava in dealings with a number of Institutions and Organisations</p>
CTLpack Vitoria		<p>Alava Technology Park</p> <p>The Alava Technology Park brings together the forefront of industry not only in Alava, but also in the Basque Country, with a pool of companies, key agents and start-ups in the strategic sectors defined by Europe.</p>

CTLpack Vitoria



ITENE

Technology centre, a private non-profit entity, dedicated to research and the provision of technological and innovative services for companies.

CTLpack Vitoria



Egibide

Christian social initiative centre. It offers Compulsory Secondary Education, Baccalaureate and Vocational Training, forming conscious, competent, compassionate and committed people, facilitating the transition of people from studies to the world of work and supporting them in their lifelong learning.

CTLpack Vitoria



Gaiker

Technology centre, a private non-profit entity, dedicated to research and the provision of technological and innovative services for companies.

CTLpack Vichy



Polyvia

Union des transformateurs de polymères [Union of Polymer Converters], serving a strong, ambitious and innovative profession.

9 FINAL COMMITMENT

With this Progress Report, the CTLpack Group expresses its willingness and interest to continue working and promoting Corporate Social Responsibility policies and actions, collaborating with our Stakeholders with the aim of continuing to advance and contribute, within our capabilities, to the dissemination and implementation of the principles of the United Nations Declaration and the Sustainable Development Goals.

15 July 2024 in Vitoria-Gasteiz.





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