







Sustainability Report 2022



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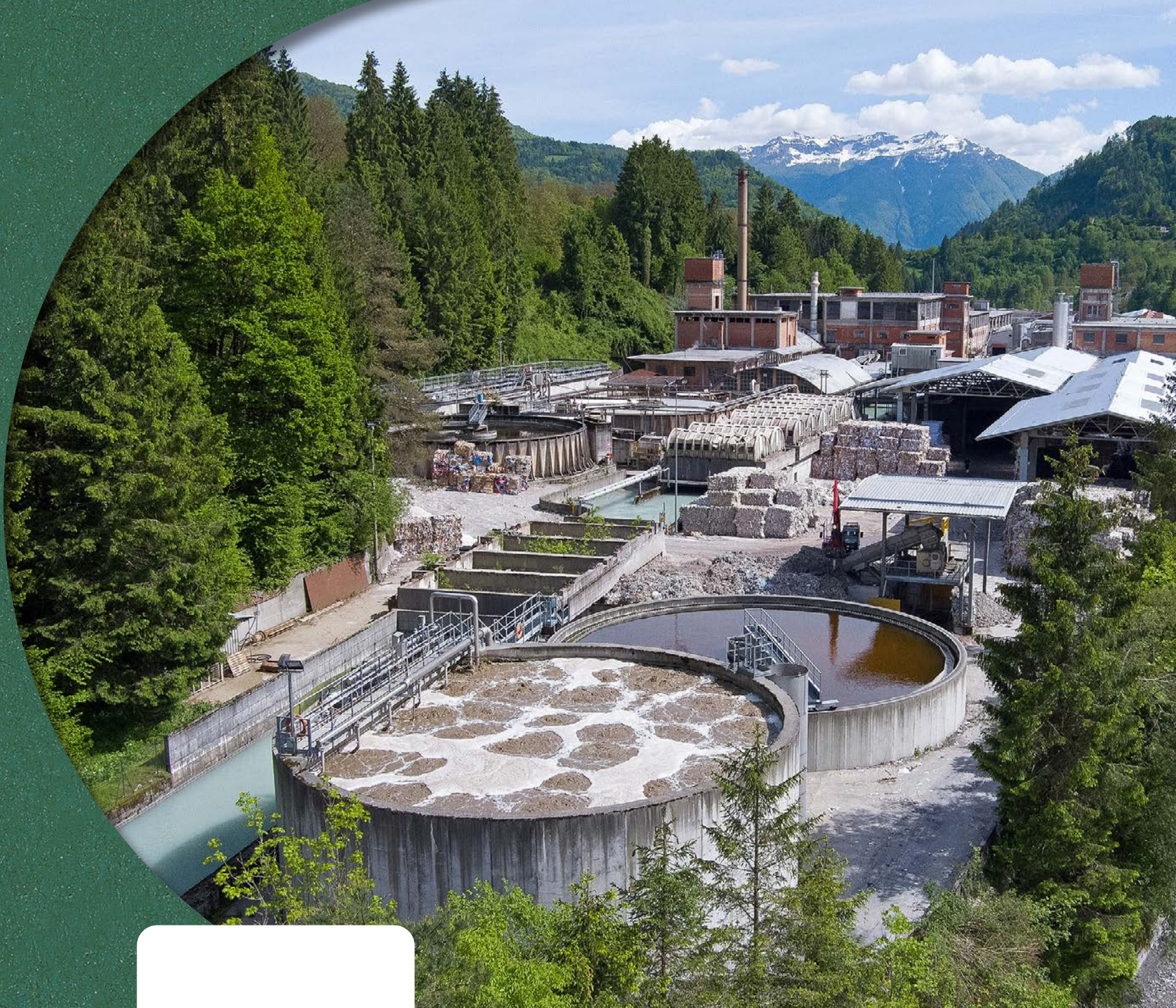
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Message from the CEO

Dear All,

In 2022, RDM Group continued to champion its values of sustainability and circularity as it responded with consolidation, growth and resilience in a year that required the business to continuously adapt to internal and external challenges.

The acquisition by affiliates of funds managed by Apollo Management Group in 2021 only reinforced the importance of sustainability in the Group's business model and its drive to support the circular economy. To this end, we have made operational excellence and efficiency a priority of our company and made strategic, company-wide decisions like the "multi-mill concept" explored in this report.

Under the "Sustainability-Linked Bond" issued in 2021, we have three targets to be achieved by 2025: a 15% reduction in specific CO₂ emissions, an increase in the proportion of waste sent for recovery to 81.5%, and a 10% reduction of specific wastewater discharges. These targets align not only with the Group's 2030 Sustainability Goals but also the UN's Sustainable Development Goals.

Innovation has been an important part of our strategy. The key to reaching our targets is by applying the latest technical and technological advancements to operational efficiency to reduce our impact and strengthen our core business. Last year, we did this through targeted investments that improved processes and reduced water, energy and waste.

The installation of a new gas-fired cogeneration power plant at the Ovaro mill in Italy will allow for greater energy efficiency and reduce emissions and water withdrawal. The waste-to-energy plant in Eska Hoogezand, Netherlands, diverts more than 11,000 tons of waste from third-party managed landfills or other disposal destinations. In Barcelona, Spain, the installation of washing machines can reduce the number of fibers in the pulper waste from approximately 20% to 5% of the total volume. And a new boiler at the Santa Giustina mill in Italy more efficiently produces steam and reduces NO_x emissions.

We always put people and their safety at the center of our actions through programs like the Behavior-Based Safety (BBS) program, our "Zero Accident" target, and by working to achieve full ISO 45001 certification at all mills. In addition, to better monitor and coordinate the process of implementing sustainable actions, we strengthened our internal teams.

With all these changes, we are reducing the company's impact and fostering a more sustainable culture at RDM Group.

RDM Group CEO

Michele Bianchi




About us

RDM Group believes in creating sustainable value for its stakeholders and the communities it operates in and approaches its business through the lens of the circular economy.

RDM Group is the leading producer of recycled cartonboard for packaging and other fiber-based products in Italy, France, the Netherlands and the Iberian Peninsula. All its products are made from renewable materials and are designed to be fully recyclable. RDM Group has been a private company under the Apollo Fund's ownership since 2021.

RDM Group offers two product types: coated cartonboard, or white-lined chipboard (WLC), and solid board, which come in reels and/or customized sheet format.

WLC can be used as both primary and secondary packaging for foodstuffs, household appliances, cosmetics and personal care products, in publishing or for the creation of displays and toy stands. It mainly serves the European market, whereas the solid board, which is primarily used in the luxury packaging market for the fashion industry, high-end beverages, books, notebooks and puzzles, represents a leading segment worldwide, including in the United States and Asia.

MARKET SEGMENTS

White-lined chipboard (WLC)



Coated cartonboard for packaging made from recycled fibers.

Solid Board



High-grammage recycled cartonboard that is well suited for specialty products, luxury packaging and publishing.

Vision and values

RDM Group operates as a multinational and multicultural company committed to generating long-lasting value for both its stakeholders and communities, with a strong emphasis on sustainability.

The identity of RDM Group is built on a clear vision that seeks to strike a balance between its business offer and stakeholder expectations. RDM Group's vision is to be the partner of choice for all key stakeholders with three strategic goals in mind.



Offering excellent products and services



Maximizing stakeholder satisfaction



Optimizing costs

The achievement of this vision is dependent on the Group's deep-rooted values, which guide the actions of every person within the company.



Group-wide vision

The capacity to build a vision that leads to the success of the Group.



Empathy

The attitude of understanding others and being empathetic.



Responsible decision-making

The awareness that decisions have an effect on others.



Togetherness

The combination of a shared vision and a sense of belonging.

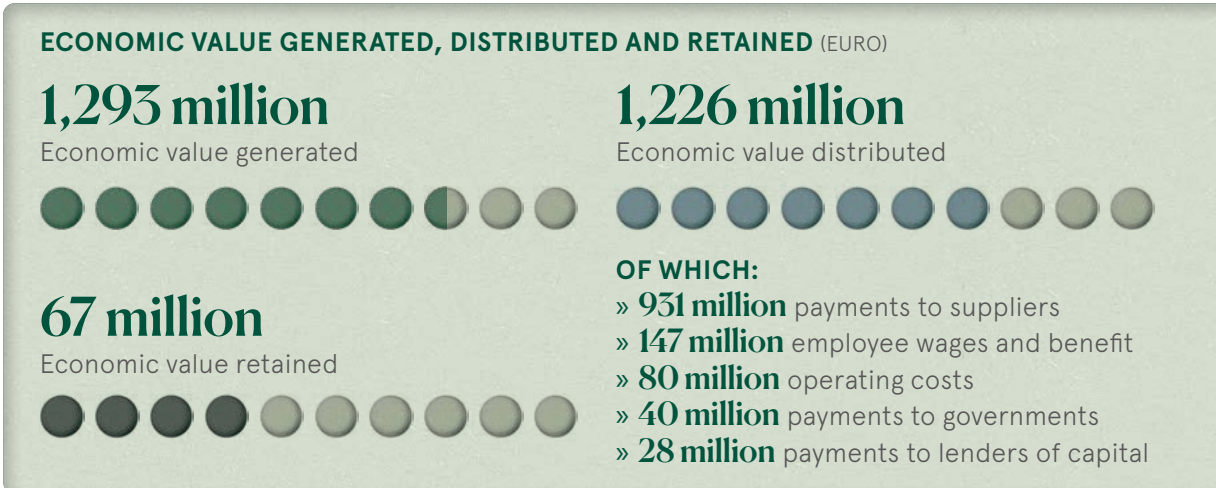
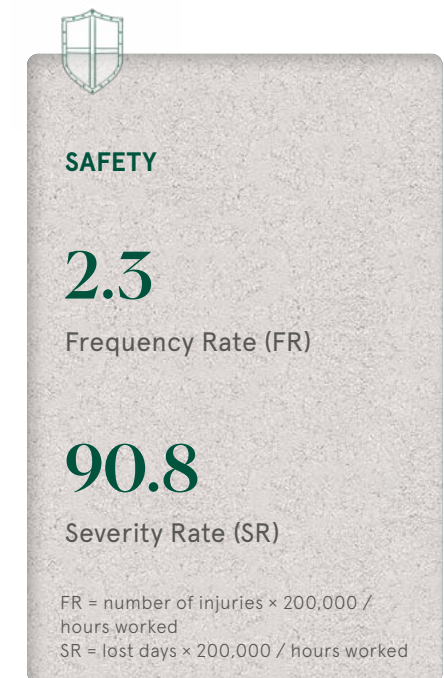
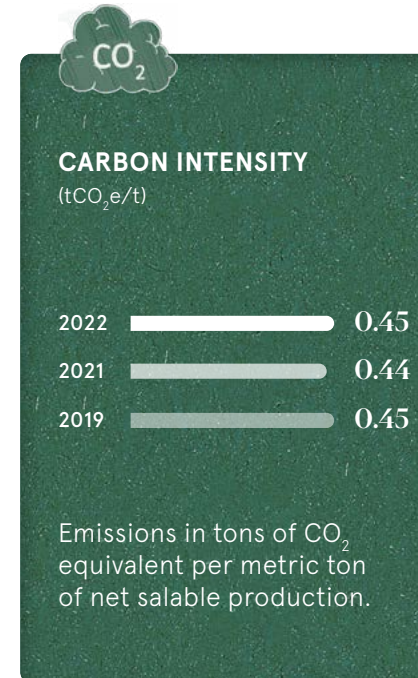
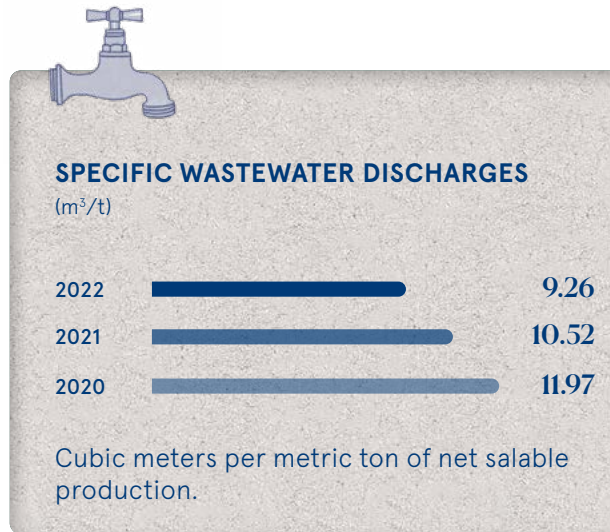
THE GROUP CODE OF ETHICS IS AVAILABLE ONLINE AT:
<https://rdmgroup.com/governance/code-of-ethics/>

Highlights 2022

1,222 € million
in revenue as of 12/31/2022

1,206 kilotons
of cartonboard
(net salable production)

2,030 direct employees
at RDM Group



Global Presence

In 2021, funds managed by affiliates of Apollo Global Management, Inc., a high-growth, global alternative asset manager, acquired RDM Group.

Since then, the Group has expanded operations across Europe and beyond. The Group employs almost 2,200 people at nine board mills, four sheeting centers and in its offices across Europe, North America and Asia.

RDM Group has established a strong international network, expanding its reach, tapping into new markets and better serving customers. Its presence in multiple geographical markets has allowed it to achieve sustained growth and will continue to contribute to its future development.

EUROPE

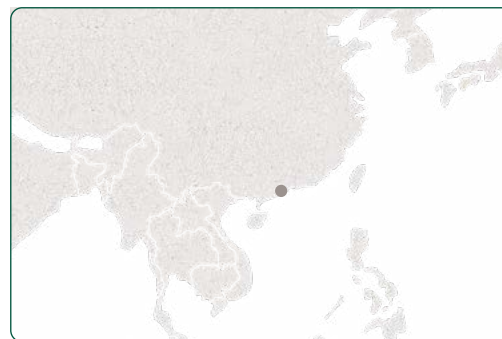
- HEADQUARTERS
- SALES OFFICES
- BOARD MILLS
- SHEETING CENTERS



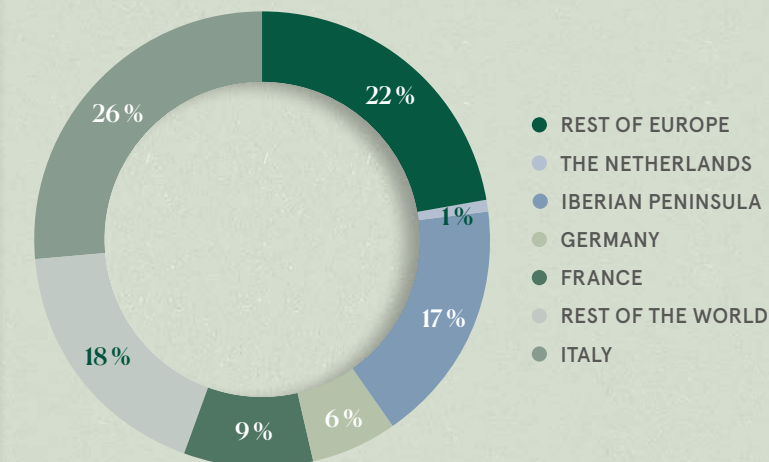
NORTH AMERICA



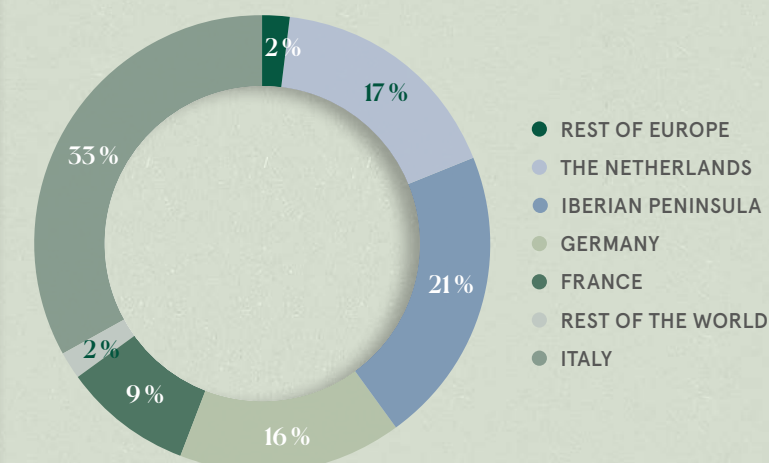
ASIA



SALES BY COUNTRY



EMPLOYEES BY COUNTRY



A Circular Business Model

RDM Group's business model is built on the principles of the circular economy, which replaces a system of wasted resources with a cycle of regenerative resources and circulating materials.

RDM Group's products are designed to be renewable, recyclable and, in turn, recycled, so that they can be returned to this cycle after use. This circular model creates a closed-loop system in which waste is minimized and resources are conserved.

Everything starts with sourcing the paper for recycling. The company's technologies and production systems transform paper for recycling, giving the recycled fibers new life, whether they come from city recycling systems or from industrial and commercial sectors.

At RDM Group, 95% of the fiber-based raw materials used in the production phase come from paper and cartonboard for recycling, and over 85% of all materials used come from renewable sources. Sustainability is thus an integral part of RDM Group's business model.

PRODUCTION PROCESS

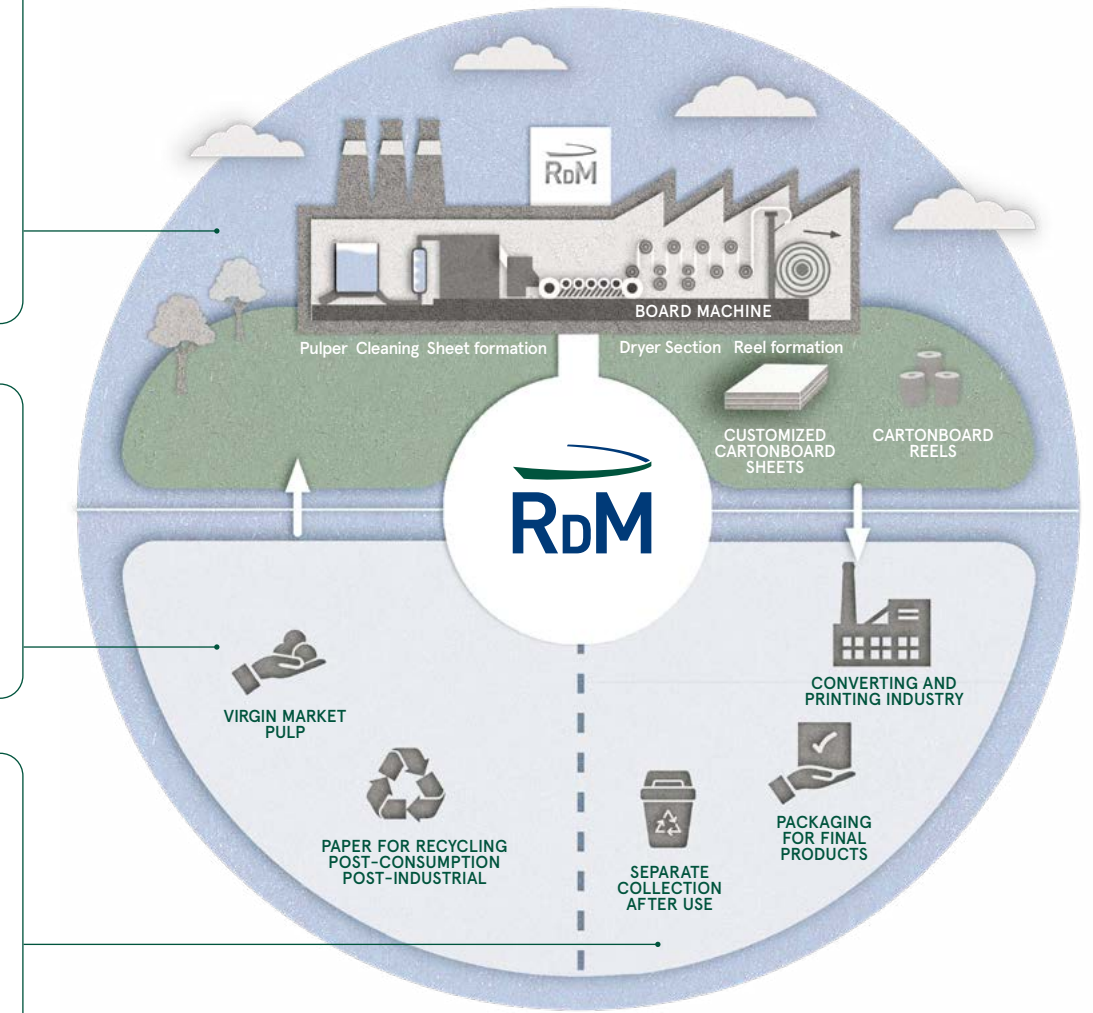
Fiber-based raw materials are mixed with water to create a cellulose fiber suspension. Through a complex purification system, impurities (e.g. sand, metals and plastics) present in the raw materials are removed. The board machine consists of a linear consecutive system of sheet forming, pressing and drying, intended to remove water from the fiber suspension. A coating layer is applied depending on the type of cartonboard. Once produced, the cartonboard is rolled into smaller reels for direct dispatch or cut into sheets and packaged onto pallets for transportation and delivery. Quality tests are performed throughout the whole production process.

UPSTREAM

RDM Group purchases paper for recycling from the industrial and commercial sectors and from city collections. The company uses a limited amount of FSC®/PEFC certified virgin fiber pulp, which is purchased externally from selected third parties. Virgin pulp is used to supplement recycled fibers to give cartonboard specific physical and mechanical characteristics. For the coating layer, RDM Group sources from another stream of raw materials, made of starches, lattices and other substances.

DOWNSTREAM

RDM Group products are intended mainly for the converting and printing industry, which uses cartonboard for packaging. Clippings and scraps from the converting and printing processes are collected and delivered back to the mills as raw materials, either directly or through external sorting facilities. More than 80% of fiber-based packaging products (Eurostat 2020) are reintroduced into the cycle of recycling by the end consumer after use, feeding the sustainable and circular business model of recycled cartonboard.



Management systems

The efficient management of business processes is a key element of long-term success. For this reason, RDM Group has implemented management systems certified according to the internationally recognized ISO standards.

RDM Group’s current management systems cover a wide range of areas, such as quality, health and safety, environment and energy. Other management systems and product certifications, such as FSC® and PEFC, are in place to satisfy specific market demands.

In 2022, RDM Group expanded its ISO certifications with the successful transition of the Paprinsa mill in Spain to the ISO 9001 standard. Other certification processes are currently underway.

Last year, RDM Group also obtained several multi-site certifications for its Italian locations. This achievement shows significant progress, not only in

the integrated management of key business areas, but also for more effectively integrating its mills. This process started with its Italian locations but will continue at the other production sites. Thanks to integrated management systems, RDM Group is better equipped to exploit synergies, improve the consistency and efficiency of operations, decision-making and relations with certification bodies.

In addition to the multi-site ISO certification project, RDM Group plans to obtain the ISO 45001 certification for all plants in 2023.

To help the mills achieve the targeted certifications and increase the necessary level of integration across management systems and mills, the Group has created a dedicated corporate function: Integrated Management Systems. Its aim is to implement a homogeneous and rigorous integrated management system across plants and countries with different legislations.

CERTIFICATIONS OF MANAGEMENT SYSTEMS ACTIVE WITH INDICATION OF THE YEAR OF FIRST ACHIEVEMENT

LOCATION	ISO 45001	ISO 9001	ISO 14001	ISO 50001	EMAS	BLAUER ENGEL	FSC®	PEFC	BRC EN15593 ISO 22000
Arnsberg	-	1992	1997		1997		2010		
Barcelona	2021	1996	1998	2020	2000		2015		2010
Blendecques	-	1995	-	2014			2008		
Headquarters Milan	2019	1996	2021	2021					
Hoogezand	-	1997	2014	2020			2018	2017	
Magenta	-	1996	-				2010		
Ovaro	2020	1996	2004	2015		2015	2009	2017	
PAC Service	2021	1997	-				2010	2009	2018
Paprinsa	-	2022	-				2012		
S. Giustina	2020	1996	2001	2015			2010	2016	2020
Sappemeer	-	1997	2014	2020			2018	2017	
Villa S. Lucia	2020	1996	2005	2015			2010		

In green are the multi-site certifications.

B CORP CERTIFICATION

In 2022, Eska received the B Corp certification, making it the first board brand to join a community of companies dedicated to social and environmental sustainability. B Corp certification aims to encourage businesses to operate with greater responsibility and transparency, demonstrating that business success can go hand in hand with sustainable development.

As a global company with a long-standing commitment to sustainability, Eska has always operated with a circular economy mindset.

2020 - 2030 Sustainability Plan









Sustainability has always been at the center of RDM Group’s responsible decision-making. While European authorities continue to respond to the call for more sustainable action by drafting the recent EU Green Deal, RDM Group has established its own sustainability agenda, to create value for the planet and society.

RDM Group’s 2020 – 2030 Sustainability Plan was established before the acquisition by funds managed by affiliates of Apollo Global Management, showing that sustainability is a genuine part of its way of doing business. Following the acquisition, RDM Group issued a Sustainability-Linked Bond. The interest rate of this Bond is directly correlated to the achievement by 2025 of three specific sustainability targets: a 15% reduction in specific CO₂ emissions, an increase in the proportion of waste

sent for recovery to 81.5%, and a 10% reduction in specific wastewater discharge, compared to 2020 levels. This additional link between financials and the long-term sustainability goals reinforces RDM Group’s commitment to driving positive outcomes for its stakeholders and the environment.

To support this plan, in 2022, RDM Group invested in a brand new high-efficiency power plant in Ovaro, Italy; installed three new steam boilers in Hoogezand, Netherlands, including one e-boiler; and improved the recovery system of process water in Barcelona, Spain, to reduce the amount of water withdrawn and discharged. The Group expects to achieve its 2030 goals and meet targets through its tactical continuous improvement approach and the clear investment plan in place.



GOAL	BASELINE 2020	PROGRESS 2021	PROGRESS 2022	TARGET
 Reduce Scope 1 and Scope 2 CO ₂ equivalent emissions per ton of net salable production	0.50 tCO ₂ e/t	0.46 tCO ₂ e/t	0.45 tCO ₂ e/t	-30% by 2030
 Increase the proportion of waste sent for recovery	73%	69%	68%	90% by 2030
 Reduce the total amount of waste generated per ton of net salable production	181 kg/t	163 kg/t	179 kg/t	-20% by 2030
 Reduce wastewater discharge per ton of net salable production	11.06 m ³ /t	10.19 m ³ /t	9.26 m ³ /t	-20% by 2030
 Key suppliers assessed and qualified according to ESG criteria for all relevant product categories	New assessment to be started	Assessment platform identified	Assessment platform identified	100% by 2025
 Implement a Behavior-based Safety Program at all production sites	1 site	2 sites	3 sites	All sites by 2023
 Increase the employee advocacy rate	3.98	n/a	4.16	4.50 by 2030
 Increase the percentage of women employed by RDM Group	9.5%	10.4%	10.7%	+30% by 2030

The baseline for carbon intensity, wastewater and waste goals does not include the mill of La Rochette, as it was part of a sales agreement in 2021. Therefore, the 2020 and 2021 figures reported in this table differ from those reported in other sections of this report. For further information on the specific results, please refer to the different content areas of this report. Please note that the 2022 figures also include the Eska (Hoogezand and Sappemeer) and Paprinsa acquired mills.

Strategy & Governance

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2

Mills have successfully launched the **Operational Excellence Manufacturing project** to modernize industrial processes and make them more sustainable. Two more mills will be added to this program in 2023.



30

Plus associations joined locally and internationally to support innovation in our sector and strengthen partnerships for sustainable development.

Business Overview and Outlook

RDM Group transforms materials to give them new life through the production of recycled, fiber-based cartonboard. The Group's business model is based on the concept of a circular economy and it strives to create sustainable value in every aspect of the business.

The Group's vision is to be the partner of choice for all stakeholders and to bring together a group of companies, skills and expertise to be one of the leading cartonboard producers in Europe, with a focus on recycled cartonboard. RDM Group products are designed to be reintroduced into the circular economy cycle after use, replenishing the resources that feed the Group's business model.

Consolidation and growth summarize RDM Group's 2022. The acquisitions made in mid-2021 and their integration into the Group's operations has allowed the company to grow in terms of market leadership and financial results. Financial health of the Group has been a key factor of growth and development of the business in recent years.

The acquisition of the Paprinsa mill allowed the Group to strengthen its leadership position in Spain and create a direct channel to serve the Iberian Peninsula and North Africa. The integration efforts in 2022 fostered the improvement and expansion of the product portfolio, the alignment of the product technical specifications and the optimization of the production volumes between sites. In 2022, the mill introduced an additional shift in the operations schedule, significantly improving efficiency and production volumes. The past year

has been a record year for the mill in terms of daily gross production. With Paprinsa's integration into RDM Group, the mill benefits from the existing sales network, which simplifies the pre-existing commercial architecture.

The commercial and operational synergy between the White Lined Chipboard (WLC) mills of Paprinsa and Barcelona have allowed the Group to achieve remarkable operational and financial results and expanded its presence in Spain.

RDM Group operates under the "multi-mill concept," which means the manufacturing of most strategic products is done in multiple plants to deliver products to customers regardless of the production site. Paprinsa and other mills, were able to successfully serve customers of the Blendecques mill, which suffered a fire in 2022. Thankfully, no employees were injured, but the mill had to shut down from late March 2022 to January 2023. The unfortunate event at Blendecques was a stress test for the Group's "multi-mill concept" that has proven to be strategically beneficial for the company's commercial resilience.

The other acquisition in 2021 was Eska, Netherlands, which allowed the Group to expand its pre-

sence in the solid board market and its geographic footprint in the Netherlands, as well as in the United States and Asia through dedicated distribution centers. Eska is well positioned in the high-margin, high-growth luxury sector, which has been historically served by the Ovaro mill in Italy. The integration of the solid board operations, which focused on the simplification of product portfolios, and the alignment of product technical specifications has seen benefits for the Italian operations. The former Italian distribution center of Eska in San Giuliano Milanese has been moved to the premises of the sheeting center of Garbagnate Milanese, which now also serves as a solid board warehouse and distribution center. A new solid board business cluster has been created, with a dedicated organizational sales and operations structure that allows for a coordinated approach to the market.

The Group aims to further diversify its geographical presence and extend its business boundaries. It is planning to achieve this expansion through organic growth and external acquisitions. The organic growth

of operations leverages key strategic programs that are rooted in the pillars of Integration, Operational Excellence, Digitalization and Sustainability.

The integration process of Paprinsa and Eska have been moving forward according to schedule, but there are still further efficiency gains to achieve and synergies to exploit. RDM Group has a dedicated corporate structure and task force that is working on the next steps of the integration plan to ensure the best possible outcomes from these acquisitions.



Andrea Bettinelli
Chief Strategy Officer

"Our business approach is based on the notion of collinearity, where our financial outcomes and ESG performance are closely linked and synergistic in nature. We believe that by integrating these factors, we can achieve long-term success also for the broader community and environment."

After the deployment in Arnsberg, Germany, the Operation Excellence Manufacturing Program was successfully implemented in the Barcelona mill in Spain. The aim is to optimize production processes to ultimately increase operational and cost efficiency, improve quality and maximize production volumes. In 2023, the Group is planning to extend this program to all WLC manufacturing sites across Europe. The program will extend to the solid board mills in 2024, in addition to existing continuous improvement programs that are already in place in Eska.

The Group has developed a comprehensive digital transformation program aimed at achieving efficiency across all functions. In 2022, several work streams were launched, completed, or are currently being implemented as part of this ambitious plan. These work streams have benefitted various business areas, such as Financial and Sustainability Reporting, Human Resources, Sales, Operations and Project management. The Group also continued with its cyber security work plan which aims to enhance the security of the company's IT systems and data.

Energy is another strategic business area that the Group has been investing in. Considering the high volatility of energy prices in 2022, the investments made have allowed the Group to be more resilient against the external market conditions. Examples of this include the new boilers at the mills of Santa Giustina and Hoogezand, which allows for more efficient production of steam for manufacturing, and the new high-efficiency cogeneration Plant in Ovaro, Italy. The next step will be the installation of a new cogeneration plant in Barcelona which will allow for a more efficient production of thermal energy and electricity for the mill. This investment will play a key role in the Group's sustainability results.

With the support of Apollo Funds, RDM Group can further expand its business boundaries, building on strong foundations and key competencies. RDM Group and Apollo share a belief in the concept of "collinearity" in which financial and environmental sustainability performance are connected and mutually beneficial. This has allowed the Group's sustainability agenda to gain momentum and increasingly support overall business development.

Apollo Global Management

The acquisition of RDM Group by the affiliates of funds managed by Apollo Global Management marked a pivotal moment for the company as it went from being a publicly listed company to a privately owned organization backed by one of the largest alternative asset managers worldwide.

Apollo is a high-growth, global alternative asset manager with approximately 548 billion USD of assets under management as of December 31, 2022.

RDM Group is part of the Apollo Impact Mission (AIM) Fund that seeks to achieve meaningful impact at scale, by pursuing private equity-like opportunities with the intention of generating positive, measurable social and/or environmental impact while generating attractive risk-adjusted returns. RDM Group reflects Apollo's strategy to partner with businesses that pair financial performance to have a positive effect on society and the planet.



Corporate Governance

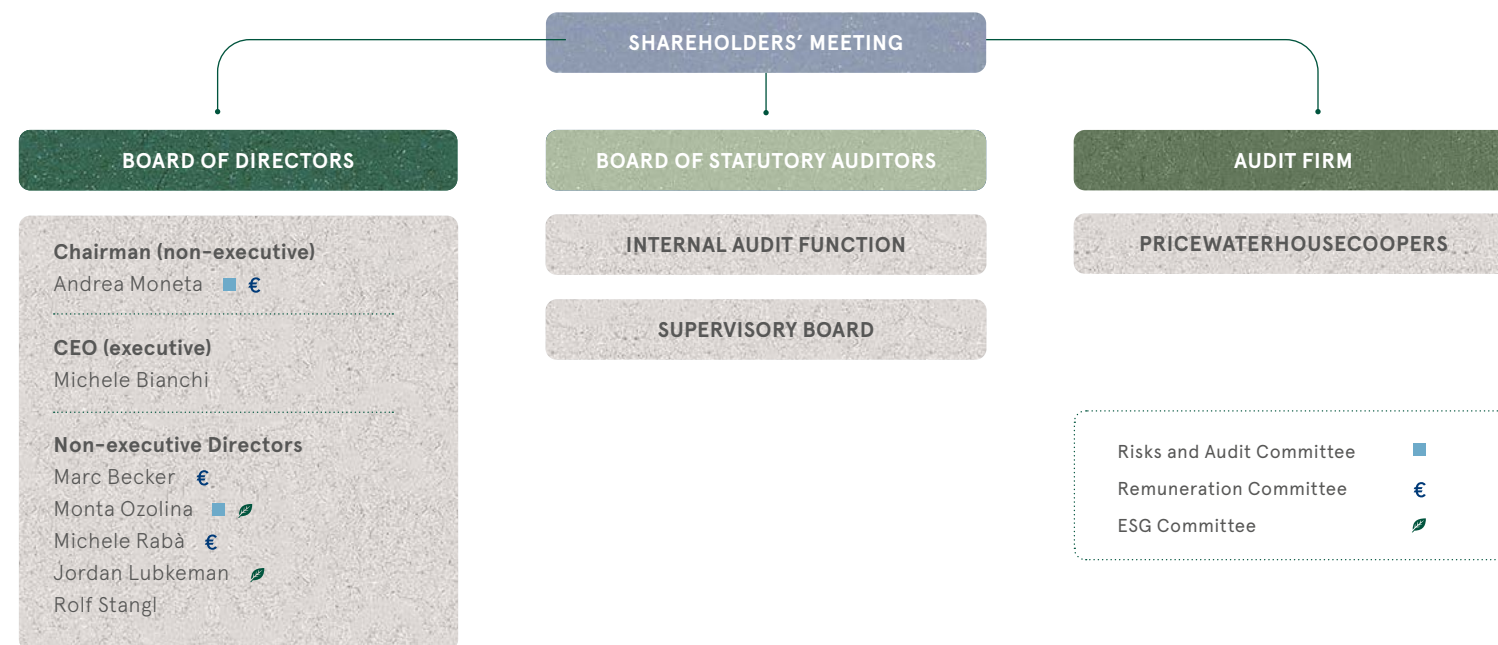
The Corporate Governance system ensures the effective and efficient management of all business activities to create value for all of the Group's stakeholders.

The Corporate Governance system ensures the effective and efficient management of all business activities to create value for all of the Group's stakeholders. The Governance system complies with the traditional administration and control model that requires the presence of a Board of Directors and a Board of Statutory Auditors, both appointed by the Shareholders' Meeting.

The Board of Directors is comprised of diverse individuals with a strong managerial and professional background, following a shareholder decision to place emphasis on diversi-

ty, not just in terms of gender, but also age and geographical background. The Board consists of one executive director (CEO), the president and five non-executive directors. Being RDM Group a privately owned company none of the Board members is non-independent.

RDM Group voluntarily decided to adhere to the Italian Stock Exchange Corporate Governance Code, a best practice that imposes gender equality on the Board and self-assessment of Board members on matters regarding its size, composition, functioning, and overview of the company's management and impacts.



To assist the Board of Directors in fulfilling its responsibilities and to ensure effective governance and oversight, three specific committees have been established. Each committee meets quarterly and includes the participation of the company's management. Specific information flows toward the members of the committees have been implemented so that all members of the Board of Directors can be constantly informed about all relevant matters. In addition, the Board of Directors discusses the committees' reports in its meetings twice a year. During these Board's meetings, each committee presents a summary report of the work and achievements accomplished. Should it be necessary, the Board of Directors and committees can meet on an extraordinary basis.

LEADERSHIP

In addition to the Board's committees, RDM Group has established a strong internal governance structure to review business operations and address strategic matters. The Leadership Management Team meets monthly to review the implementation of strategy, examine operational plans, discuss the development of new projects and monitor ESG results. It is composed of key Corporate Heads of Functions.

In addition, the Group has different networks to manage operative effectiveness and Group-wide functions (e.g. Safety, Energy, Customer Technical Service, etc.) to coordinate between different plants and countries. These networks facilitate the identification and sharing of information, best practices and challenges across different locations. In 2023, two new internal committees – the Internal Control Committee and Privacy Committee – will be created to enhance the governance and supervision of important processes.

ESG COMMITTEE

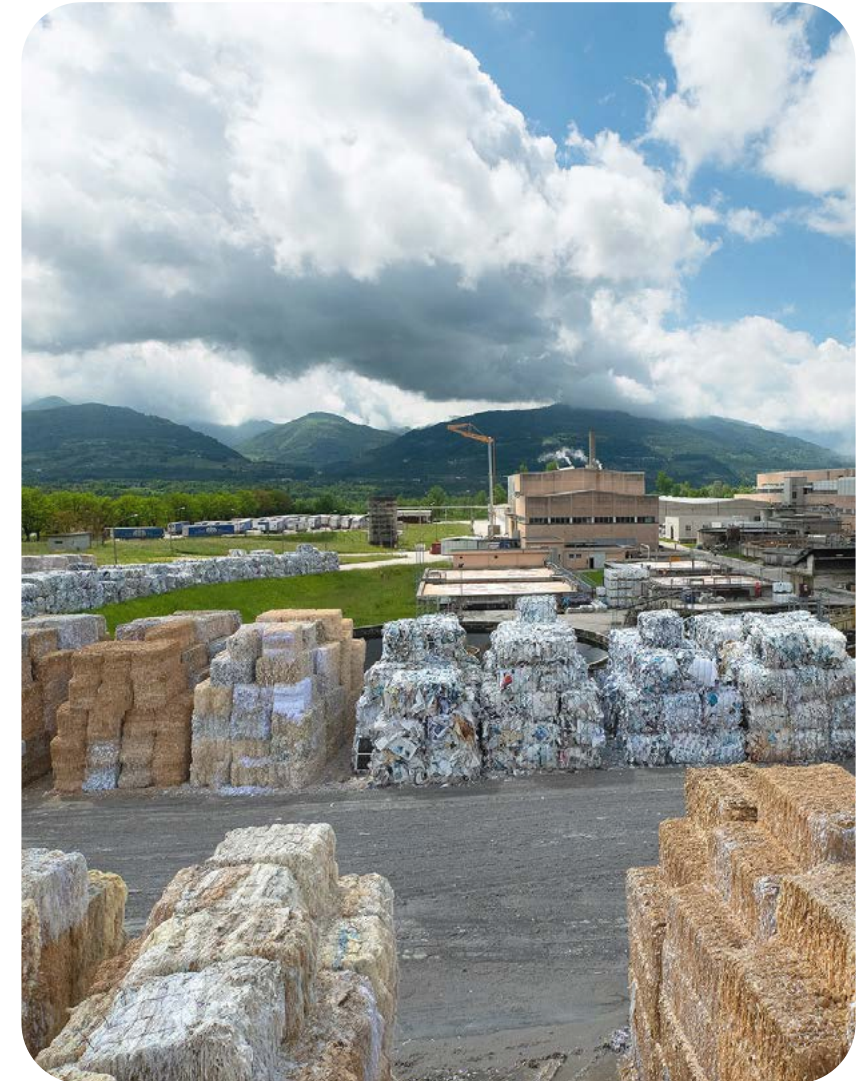
The committee holds an advisory role within the Board of Directors, primarily regarding the definition of the sustainability strategy, identification of objectives and targets, implementation of policies, analysis of the potential impact of risks and, more generally, integration of sustainability into management dynamics. The ESG Committee also reviews the Sustainability Report prior to its submission to the Board of Directors for final approval.

RISK AND AUDIT COMMITTEE

The committee consults on the organization and operations of the company's internal control system, which is understood as a system for verifying effectiveness and compliance with both existing and planned internal procedures. This ensures sound and efficient management and, where possible, the identification and prevention of financial and operational risks and fraud against the company.

REMUNERATION COMMITTEE

The committee advises on the remuneration of directors, including those holding special offices and top management positions within the company. It also prepares, updates and implements the succession plan of the Chief Executive Officer, Top Management and other Executive Directors.



Business Integrity

At the core of RDM Group's choices and actions is the awareness that its decisions affect others. The company's decision-making process is rooted in responsibility, a principle that guides daily activities and requires all employees to act within the law. The company has adopted several tools designed to ensure the effective, efficient and transparent management of business integrity.

CODE OF ETHICS

The Code of Ethics applies to all of the Group's stakeholders and establishes the values, principles and rules of conduct that the Group adopts. Responsibility and compliance are paramount for anyone who represents RDM Group in various capacities, either as an employee or carrying out activities in the interest of and on behalf of the Group.

The Supervisory Board is responsible for ensuring and verifying the application and implementation of the Code of Ethics with the support of the Group's Internal Audit function. Employees and interim workers must comply with the Code and are required to report any violations, or suspected violations, to the Supervisory Board through the channels identified and in compliance with the provisions indicated in the whistleblowing procedure.

RDM Group periodically reviews and updates the contents of its Code of Ethics. The latest version was approved by the Group's Board of Directors in April 2021. In 2022, the companies acquired in mid-2021 (Eska and Paprinsa) adopted the Code of Ethics, following the approval of their respective Boards.

CONFLICTS OF INTEREST

Employees and members of the Boards must avoid and refrain from any activity that could create a potential conflict of personal and corporate interest, or that could hinder the correct conduct of the person's activities and the subsequent ability to make impartial and objective decisions in the interests of RDM Group.

Furthermore, employees and Board members must promptly inform their hierarchical superior and/or the Supervisory Body, of any possible, actual, or potential conflicts of interest, whether they be economic, personal and/or family related.

This is explicitly stated in the company's Code of Ethics which applies to all employees and members of the Board.

ANTI-CORRUPTION

A robust risk assessment process and appropriate management tools help ensure regulatory compliance and prevent corruption within the Group. These measures are key to protecting the company's values and principles, as well as its reputation. The Anti-Corruption Code was developed to manage relations with Public Administration and third parties. The Code outlines the general principles, rules of conduct, controls and prohibited actions for those carrying out company activities. Its purpose is to prevent, repress and report any breaches of the rules governing corruption or any other type of fraud. The Anti-Corruption Code has been adopted by all of RDM Group's legal entities, excluding Eska and Paprinsa, due to their recent acquisition in mid-2021.

The Code is also part of the wider "Organization, Management and Control Model," pursuant to the Italian Legislative Decree No. 231/01, which is approved and adopted by each Italian entity of the Group. The model contains rules, principles of conduct and a system of sanctions aimed at preventing specific offenses, including environmental, occupational health and safety, and corruption offenses. The effective application of the model is continuously monitored by the Supervisory Board.

The model is also periodically updated following changes in the corporate structure, and when new crimes are introduced to the Italian Legislative Decree No. 231/01. The Group's parent company communicates the approval and adoption of the model to each company, and each subsequent edition thereof. Each single legal entity in the Group acknowledges and adopts the general principles of conduct and compliance defined by the parent company. In addition, each of the Group's companies implements local programs to comply with national regulations regarding their responsibilities as legal entities.

A RESPONSIBLE TAXPAYER

RDM Group complies with national and international laws and regulations regarding tax payment to fulfill all of the requirements of fiscal authorities and the development of transparent relations with public administrations based on collaboration and mutual trust. The locations of RDM Group's operations are chosen based on the business strategy and needs and are not influenced by the tax regimes of a specific country.

The Group has defined a tax strategy establishing an internal control system for managing tax risks in accordance with the international standards endorsed by the OECD and the tax authorities in the countries in which the Group operates.

HUMAN RIGHTS

Ensuring and developing sound business practices across the Group's supply chain is of utmost importance. The majority of the suppliers are located in countries that are considered low risk for human rights violations, according to the annual "Freedom in the World 2021" report by Freedom House and "The State of the World's Human Rights Report 2020/21" by Amnesty International. The FSC® (Forest Stewardship Council®) standard provides an additional guarantee that human rights and indigenous people's rights are respected in the purchase of market pulp and raw materials.

Integrity in business conduct is an essential prerequisite in managing relations with suppliers, who are required to comply with the principles outlined in RDM Group's Code of Ethics, including respect for human rights. Where applicable, the company always secures national collective bargaining agreements to provide appropriate working standards and conditions.

To date, these measures have proven to be effective as the Group has never received any reports or been made aware of any violations of human or workers' rights by suppliers or collaborators working with the Group.

ANTITRUST PROGRAM

RDM Group adopted an Antitrust Compliance Program to prevent and reduce the potential risk of violating regulations and to ensure a prompt reaction should a critical situation occur. To ensure the understanding and correct application of the Antitrust Program, specific training sessions are currently under way, primarily aimed at the Group's salespeople who are the most exposed to this matter.

RDM Group ensures that all salespeople hired receive appropriate training on antitrust matters as part of its approach to fair competition. An organization-wide training program for all companies will take place in 2023 and will also include the other main governance programs and procedures (e.g. Organizational Model, Anti-Corruption, Code of Ethics, Privacy).

To strengthen the culture of compliance, the Group also adopted a specific protocol to manage possible dawn raids by the relevant authorities.

GRIEVANCE MECHANISMS

In addition to having an open-door policy in which employees are encouraged to bring up their concerns to their immediate supervisor in an informal setting, RDM Group has adopted a whistleblowing mechanism to guarantee the reporting of violations

of the Group's Code of Ethics and the "Organization, Management and Control Model" or any other critical concerns. This system is structured to ensure the protection of the reporter and the confidentiality of the information reported and allows for the timely reporting and analysis of all possible violations and abnormalities that do not comply with the company's policies. In 2022, no reports were sent to the Supervisory Board via the channels provided by this system. In addition, there were no reported cases of corruption, non-compliance with laws, regulations, or standards on business ethics, antitrust, environment, cases of discrimination, violations of the Code of Ethics, legal actions for anti-competitive behavior, or monopoly practices during this period.

Critical concerns are brought to the attention of top management and Board of Directors through channels other than whistleblowing. These channels include and are not limited to: meetings of the Board of Directors committees for all matters concerning their responsibilities, periodic meetings that involve mill management and corporate heads of functions and informative sessions toward the statutory auditors.



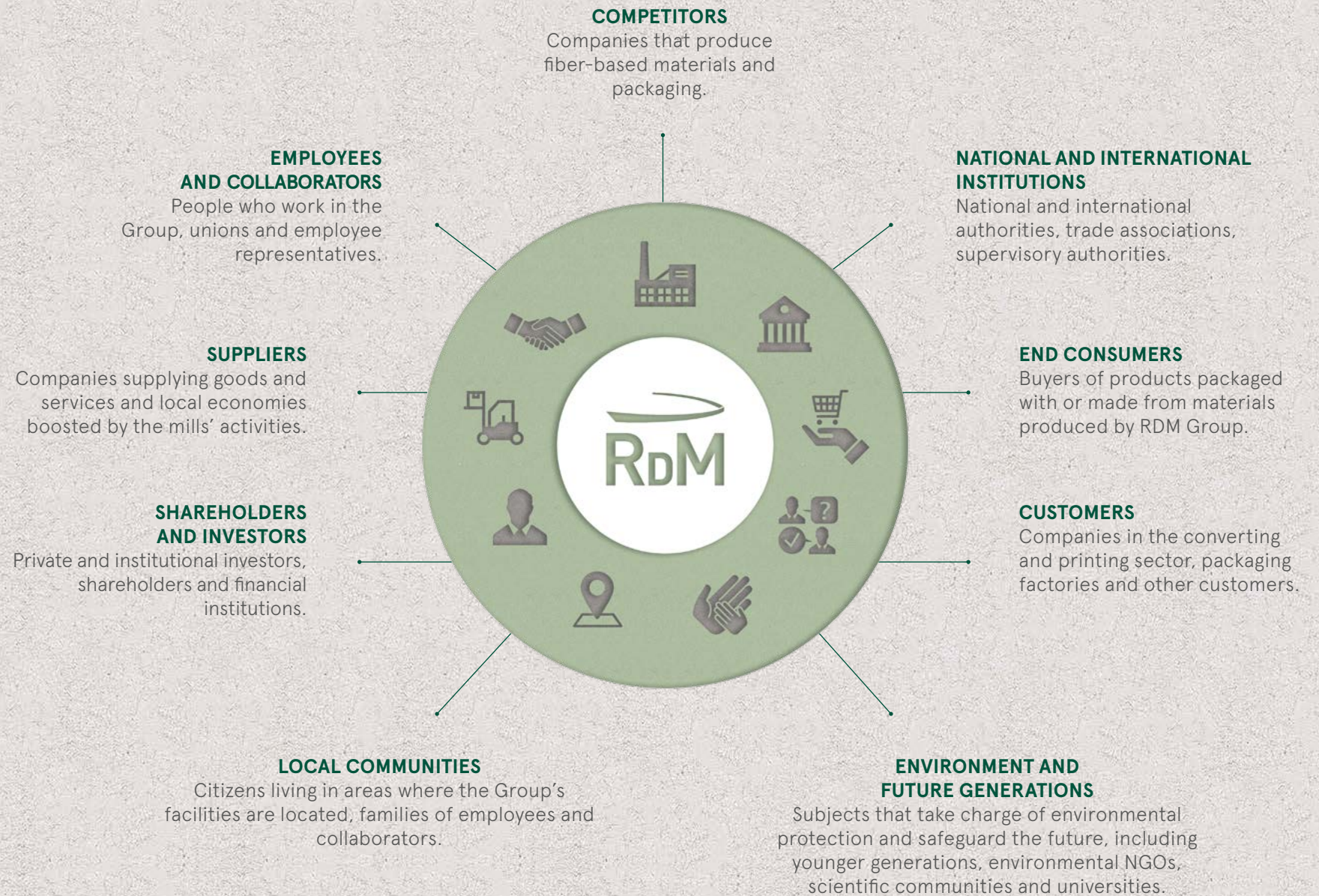
Stakeholders

Engaging in open and ongoing dialogue with key stakeholders allows RDM Group to effectively identify concerns, potential and actual impacts, market trends and expectations.

The Group recognizes the importance of engaging with stakeholders in a variety of ways, including through structured and informal interactions, regular surveys to measure customer and employee satisfaction, meetings and workshops with local communities and non-profit organizations and formal grievance channels.

Furthermore, RDM Group utilizes various communication channels to keep all stakeholders informed of the company's actions, initiatives and decisions.

The Group uses tools such as an intranet page and newsletter for internal stakeholders and its website and social media channels for external stakeholders. This approach ensures that all stakeholders have access to the most up-to-date information about the company, its operations and its projects.



Materiality Matrix

At the core of RDM Group’s choices and actions is the awareness that its decisions affect others.

The materiality analysis is an important tool that helps identify and manage actual and potential impacts of various material topics related to social, environmental and governance aspects of the company.

In 2022, RDM Group revised its materiality assessment to align with the updated GRI standards and upcoming EU CSRD (EU Corporate Sustainability Reporting Directive) legislation, which will require the double materiality assessment.

RDM Group has determined its material topics by using the process defined by the new GRI standards for the inside-out perspective to assess “impact materiality.” It also included the outside-in perspective to evaluate “financial materiality.”

IMPACT MATERIALITY

Impacts from the inside-out perspective, i.e., the significant current or potential impacts on the economy, environment and people related to an organization’s activities, including upstream and downstream activities in its value chain.

- STAKEHOLDERS ENGAGED**
- » RDM Group’s Top Management
 - » Employees
 - » Clients
 - » Suppliers
 - » Shareholder



FINANCIAL MATERIALITY

Impacts from the outside-in perspective, i.e., sustainability risks and opportunities that can positively or negatively influence an organization’s development, performance and positioning (in the short, medium or long term) and thus increase or reduce its corporate value.

- STAKEHOLDERS ENGAGED**
- » RDM Group’s Top Management



MATERIAL TOPICS

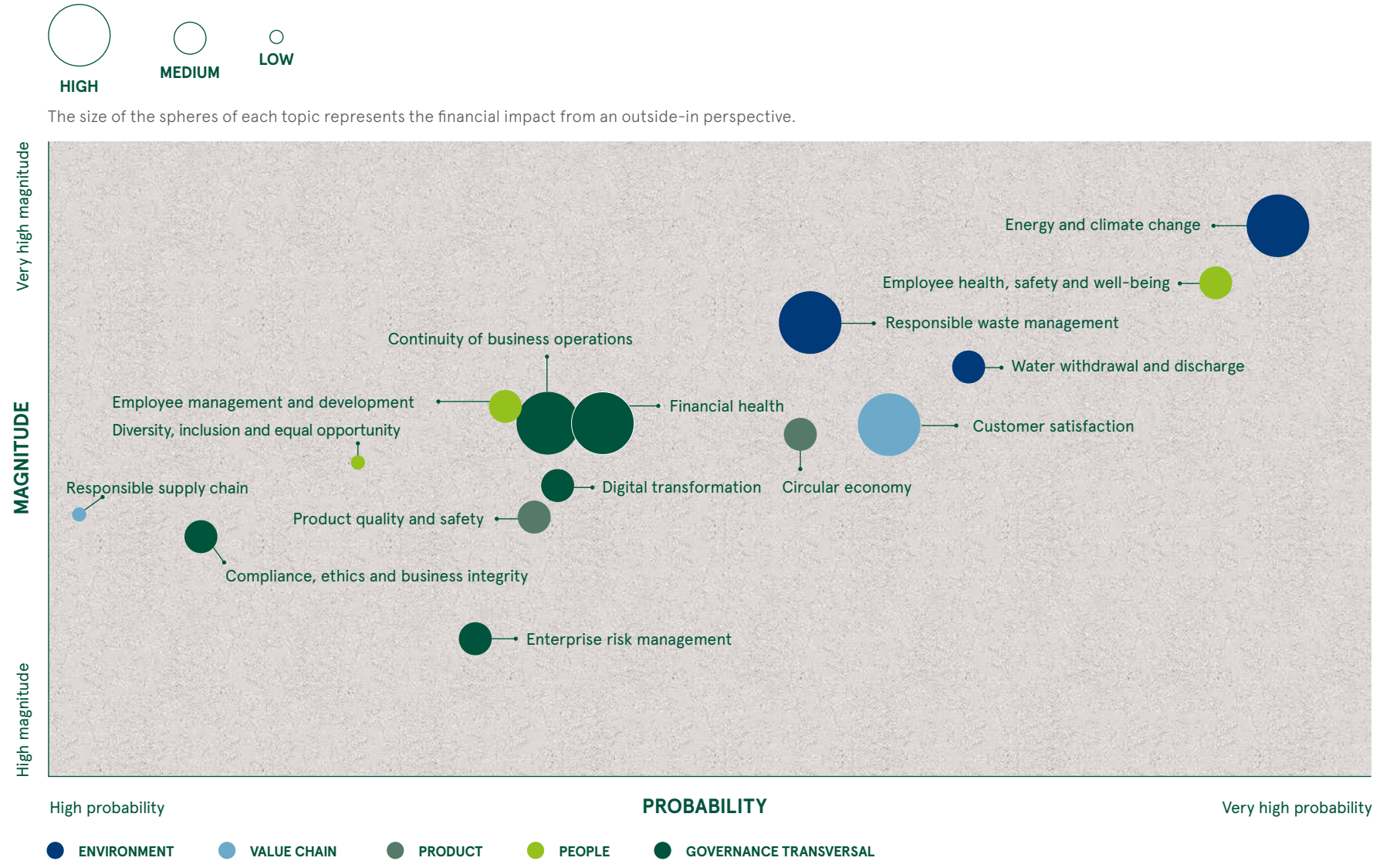
To define each material topic, RDM Group analyzed the actual and potential, positive and negative of its activities, both from an inside-out and outside-in perspective. To identify and categorize these impacts, RDM Group analyzed internal and external sources and collaborated with a number of stakeholders including experts, internal departments and functions. Furthermore, the Company’s operating context and industry was considered.

The assessment process involved dedicated workshops and surveys with various stakeholders, including key clients and suppliers, shareholders and RDM Group’s employees and top management. Participants were asked to evaluate the magnitude and probability of each topic, considering the current and potential impacts that RDM Group could have on the economy, environment and people, including impacts on human rights. Top management was also asked to evaluate the potential positive and negative financial impacts of each topic from an outside-in perspective. The results of the stakeholders and top management assessment determined the prioritization of impacts and topics.

The combination of the inside-out and outside-in perspective resulted in the identification of fifteen material topics, which were reviewed and validated by the Group’s CEO.

The matrix was preliminarily submitted and reviewed by the ESG Committee and subsequently approved by RDM Group’s Board of Directors on April 12, 2023.

RDM GROUP’S DOUBLE MATERIALITY MATRIX



X and Y axis represent the probability and magnitude in terms of impact materiality from an inside-out perspective.

Memberships

RDM Group is an active member of various associations, initiatives and working groups, at both local and international levels. The Company supports the development of the fiber-based packaging and recycling industry by promoting progress within the sector and sustainable innovation. In 2022, RDM Group CEO Michele Bianchi was appointed as the new President of Pro Carton, the European Association of Carton and Cartonboard manufacturers.

At the annual General Meeting, members of both CEPI Cartonboard and Pro Carton expressed their intention to consider merging into a single, robust association called Pro Carton. This move aims to bring the organizations closer together, enabling greater effectiveness, efficiency and representation.

Associations at international level

	4evergreen Alliance
	CEPI - Confederation of European Paper Industries
	CEPI CARTONBOARD / CEPI CONTAINERBOARD
	ECMA - European Carton Makers Association
	EPPA - European Paper Packaging Alliance
	PRO CARTON
	WCO - World Containerboard Organization

Associations at local level

	ACOGEN - Asociación Española de Cogeneración
	ASPAPPEL - Asociación española de fabricantes de pasta, papel y cartón
	ASSOCARTA
	ASSOGRAFICI
	Asolombarda, Unione degli Industriali e delle Imprese di Roma, Frosinone Latina, Rieti e Viterbo, Confindustria Belluno, Confindustria Udine
	Aspack - Asociación Española de Fabricantes de Envases, Embalajes y Transformados de Cartón
	ATICELCA
	CAP Fédération - Cartonnage et articles de papeterie
	Comieco - Consorzio Nazionale Recupero e Riciclo degli Imballaggi a Base Cellulosica
	COPACEL
	Federazione Carta e Grafica
	Foment Treball Nacional
	Gas Intensive
	GREMI - Gremi de la Indústria i Comunicació Gràfica de Catalunya
	MEDEF
	Royal VNP - Koninklijke Vereniging van Nederlandse Papier- en kartonfabrieken
	Royal VEMW - Vereniging van Energie, Milieu en water
	VDP - Verband Deutscher Papierfabriken



Risks and Opportunities

The day-to-day management of its business and the development of its strategy within the fiber-based packaging industry expose RDM Group to various types of risks and opportunities that could negatively or positively affect the Group's operating results and its financial position.

With this in mind, RDM Group has adopted several tools for the prompt identification, assessment and monitoring of a wide range of risks and opportunities to support the Group in its strategic and operational decisions, as well as to prevent any non-compliance with laws and regulations.

Moreover, in 2022 the Risk Management process was further strengthened with the creation of a new function for Enterprise Risk Management, whose objective is to develop and implement appropriate methodologies for risk recognition, evaluation and monitoring and to support the achievement of the Group's strategic goals.

The risks described below are not the only risks and uncertainties that the Group might face. Additional risks and uncertainties that RDM Group is unaware of, or that are currently believed to be immaterial, may also become important factors that affect us.

GLOBAL MARKETS

In a globalized world, every national economy is linked and interdependent on other countries' market conditions. This is, in part, a great opportunity for business, as it opens up the possibility of operating in a global market, while remaining local in answering customer needs. However, it also exposes the business to risks linked to other countries'

regulations and geopolitical situations. The Group's business connection to countries with political instability or those engaged in conflicts carries a risk in terms of supplies, especially energy sources.

Unstable global geopolitical situations lead to higher fuel costs, which impacts internal production costs, as well as road transport logistics. The latter impact can also affect the availability of operators. For RDM Group, this could incur increased costs and an uncertain availability of vehicles and workers for deliveries. Geopolitics and instability also feed inflation, which increases the end prices paid by the Group's clients.

SUPPLY CHAIN

To manage price volatility and ensure the continuity of raw material purchases, RDM Group adheres to the contractual and geographical diversification of supplies. To mitigate contingencies related to the global transportation market and to reduce environmental impacts, the Group sources raw materials locally whenever possible.

For the transportation and distribution of final products, RDM Group relies on a multi-mill strategy, which allows for flexibility in product manufacturing and logistics while ensuring that multiple mills are able to guarantee delivery if required.

The management of large quantities of incoming paper for recycling also exposes RDM Group to risks related to quality. To manage the risk of sourcing virgin fibers from potentially unsustainable sources, the Group relies on the internationally recognized chain-of-custody certification schemes:

FSC® (Forest Stewardship Council®) and PEFC (Program for the Endorsement of Forest Certification). Only certified suppliers who sustainably manage their operations and comply with the Group's environmental and safety requirements are approved to supply materials.

To manage the volatility of the wholesale energy market, in particular natural gas, RDM Group adopts a mid- to long-term volume and price purchase strategy, which limits the exposure to small volumes on spot prices. This allows the Group to lock in fuel prices and manage unexpected price spikes.

ENVIRONMENT

Paper and board production is known to be a significant user of water resources. RDM Group is engaged in dedicated programs to reduce water withdrawals through improved production processes, including increasingly closed water loops. Beyond supporting the Group's sustainability goals, this allows the organization to be prepared for the potential introduction of stricter constraints on withdrawals, especially in water-stressed areas.

The Group runs chemical, physical and biological water treatment plants to clean effluents before returning them to recipient bodies of water or directing them to local external wastewater treatment facilities. The solid board mill of Sappemeer, Netherlands, also uses an anaerobic wastewater treatment plant to effectively treat its own wastewater stream.

Each mill has systems in place for monitoring the quality of water discharges, including laboratories that run specific tests and make sure that the mills

comply with all legal requirements and quality standards.

RDM Group's impact on the environment is reduced due to the use of technologies that significantly limit the volume of waste produced, and the possibility of reusing some of the waste generated as secondary raw materials in the production processes at other organizations. With the introduction of specific equipment, the Group is able to recover the fiber content of pulper waste, thus maximizing the use of raw materials and minimizing waste. The Group is striving to increase the proportion of waste sent for recovery to minimize landfilling.

99% of the waste produced onsite is non-hazardous and is therefore of low environmental concern. The Group has adopted environmental management systems (ISO 14001) at several of the Group's companies, certified by accredited third-party bodies.

CLIMATE CHANGE

The paper manufacturing process is energy intensive and contributes to the emissions of greenhouse gases. The Group has adopted energy management systems (ISO 50001) at several of the Group's mills, certified by accredited third-party bodies.

The Group has started a process of transition toward production processes and energy sources with a lower environmental impact, including electricity from renewable sources, high-efficiency cogeneration plants and investments in energy efficiency.

The company is closely following the latest evolution in green technologies, such as those that rely on hydrogen and biogas. RDM Group has already utilized alternative technological solutions for its energy needs, such as the Waste-to-Energy (WTE) plant of Hoogezand, the Netherlands. In the future, the Group will continue to use cleaner fuels, which also allows it to contain the volatility risks in the purchase price of emission allowances under the EU Emission Trading System (EU-ETS).

Mills in locations that are potentially subject to climate change events, such as rising rivers or extreme weather, expose the company to the potential risk of disruption to operations. To reduce the impacts associated with natural disasters, the Group runs a specific prevention program that involves third-party audits to assess exposure to this type of risk and identify specific action plans for improving the resilience of each of the Group's board mills.

PRODUCT QUALITY AND SAFETY

Product safety and compliance with quality standards are pivotal to the Group's reputation and a distinctive feature of the company's products.

RDM Group has adequate facilities to meet customer requirements and an effective product quality control system that, with the support of specific technical equipment, laboratory analysis and testing, ensures compliance with board specifications and significantly reduces the risk of defects. The Group has a Technical Customer Service (TCS) organization at mill level, regional level and Group level to ensure the quality and safety of the Group's products and direct customer support. Each mill has a dedicated Quality Manager who is responsible for the quality control system.

All of RDM Group's board mills and sheeting cen-

ters have adopted ISO 9001 quality management systems, certified by independent third-party organizations. Several of the Group's products are certified for contact with food.

OCCUPATIONAL HEALTH AND SAFETY

The production process of the board mills is based on the use of automated technologies that also require manual intervention and supervision by operators.

RDM Group ensures that its workforce has the appropriate training and safety equipment by investing in machinery upgrades and providing appropriate Personal Protective Equipment (PPE).

RDM Group seeks to empower its people to manage their own safety and that of their colleagues. The Group is strategically investing in a Behavior-Based Safety (BBS) program to enhance the safety culture of the organization and promote safe behaviors. People's safety is a moral obligation for the Group and is a top commitment for all levels of management. Increasing the level of safety has demonstrated an increase in worker engagement and sense of belonging.

The Group has adopted ISO 45001 management systems and relies on dedicated safety teams, both at Group and mill level. The dialogue on safety solutions and cross-auditing between Health and Safety managers allows each plant to continuously improve its practices. Through a system of regular meetings, audits and inspections in departments and between mills, the Group aims to strengthen the preventive approach to safety management. The Group also has a centralized management position whose role is to enhance standardization, deploy Group-wide safety programs and ensure



the adoption of improvement plans in each plant.

EPIDEMICS AND PANDEMICS

In recent years, the world has faced an increasing number of epidemics and infectious diseases, Covid-19 being the most recent and impactful.

Following the outbreak, RDM Group responded promptly to government indications by assessing risks, preparing the necessary protocols to prevent contagion and setting up Vigilance Committees responsible for the correct implementation of internal procedures.

Due to effective management of the Covid-19 pandemic, none of the Group's mills or sites have seen a major spread of the Covid-19 infection. This has

allowed the Group to define emergency rules and procedures for possible future epidemic or pandemic crises and to reliably perform its role as an "essential" supplier, providing continuous support to the food and pharmaceutical supply chains, two key sectors in emergency management and the most served by RDM Group's board mills. During the Covid-19 crisis all mills remained open with no interruption to operations.

ETHICS AND HUMAN RIGHTS

In the Code of Ethics, RDM Group has defined and adopted prohibitions and rules of conduct for all business activities to prevent corrupt practices, illegitimate favors and collusive behavior. RDM

Group's Code of Ethics has been distributed to all of the Group's companies and brought to the attention of all RDM Group's employees. The Group organizes dedicated training sessions to ensure all employees are aware of the Code's principles and content.

The code has been distributed to stakeholders and it must be accepted and signed by suppliers who intend to work with the company as they are required to behave ethically and with integrity when working with the Group.

All of the Italian companies have also adopted their own Organization, Management and Control Model (pursuant to Italian Legislative Decree No. 231/01) that, as part of the internal control system, defines roles, responsibilities and protocols for preventing possible offenses.

RDM Group operates within the framework of the United Nations Universal Declaration of Human Rights and the fundamental International Labor Organization Conventions. Its operations are located in countries with a low risk of human rights violations. Furthermore, the Group is committed to fighting against all forms of professional discrimination and, where possible, national collective bargaining agreements are adopted. The purchase of FSC® and PEFC-certified or controlled fiber-based raw materials reduces the risks linked to illegal forest harvesting, exploitation of the workforce and violation of the rights of indigenous populations.

BREAKDOWNS AND PRODUCTION INTERRUPTIONS

The production process for making cartonboard, relying on board machines working 24/7, is potentially subject to failures related to perpetual stresses on the machinery.

The Group works with a key strategic external service provider to run a "loss-prevention program" with the aim of minimizing the risks of interruption and operational breakdown. In this program, the company runs a prevention maintenance program based on third-party assessments of the condition of the machinery, buildings and Combined Heat and Power (CHP) plants, to assess exposure to risks of disruption to operational continuity.

The Group has strengthened its loss prevention program by creating a new dedicated network that features a Group loss prevention manager in addition to local plant-level loss prevention managers. The implementation of action plans for improvement, the application of preventative maintenance protocols and the investments in the modernization of facilities are building blocks of RDM Group's approach to mitigating the risk of business interruption.

Moreover, the "multi-mill concept" sets RDM Group up as a network of board mills that, if needed, is able to balance and supplement the needs of individual production sites.

FIRE RISK

The risk of fires is a major threat to business continuity. The fire at the Blendecques mill in March 2022 caused extensive interruptions in operations. Third-party independent experts have confirmed the accidental cause of the fire. No employees were injured. The full reconstruction of the site will be completed later in 2023, although a temporary external sheeting solution allows operations to serve clients from the beginning of 2023.

The reconstruction project is following strict fire protection guidelines defined with the technical support of our external partner and will be used

as a reference to further improve the Group's loss prevention plan.

DIGITALIZATION AND CYBERSECURITY

The introduction of new digital technologies has created great opportunities for growth in all businesses and industries, including pulp and paper. RDM Group has set up an ambitious digitalization program that involves both production sites and offices to seize opportunities for improvement and efficiency and strengthen the digital environment of the company.

Cybersecurity has been acknowledged as a global priority for several years. Cybersecurity risks have the potential to significantly affect any business

and require being carefully and continuously monitored. To ensure business continuity and prevent the loss of relevant and personal data, as well as information across the company, RDM Group has implemented specific IT security management and control systems and adopted backup systems, cloud strategies and advanced processes to prevent unauthorized access to corporate data and operational control systems. RDM Group started a cyberattack monitoring activity performed by a specialized external IT company. The company has also appointed a new cybersecurity manager to effectively control and manage this delicate matter. To enhance the resilience of the organization, the Group is promoting training to raise awareness amongst its employees to prevent phishing and



other cyberattacks.

To ensure that all the personal information the organization processes on a daily basis is protected, the Group also observes obligations under EU Reg. 679/2016 in the section on data processing.

KNOW-HOW AND SKILLS

People are a crucial resource. Improving their motivation and enhancing their skills are two key priorities.

Paper production requires highly qualified professionals with significant and specific technical knowledge and skills. RDM Group uses coaching programs to transfer skills and know-how from senior to junior employees so that the company's skills and values can be handed down and remain within the Group.

Through dedicated training plans, the verification of their effectiveness and a process of competence assessment, RDM Group maps the company talent and allocates training investments in a targeted manner.

Through talent attraction and retention protocols, the company has competitive tools to attract young talent and retain strategic resources, including programs that facilitate a work-life balance and working from home. Diversity is one of the main pillars of the selection process as the company believes that its people can bring a great range of added value to the company that originates from their personal background.

CIRCULAR ECONOMY AND PLASTIC SUBSTITUTION

The circular economy is a fundamental concept in the European Union's strategic agenda of the Green Deal for environmental protection and economic competitiveness. As a manufacturer of recyclable products, RDM Group plays a key role in the circular economy through its business model. It is a leader in the transition toward a more sustainable society and is contributing to UN Sustainable Development Goal n. 12, which promotes sustainable consumption and production patterns.

The demand for environmentally friendly and easily recyclable packaging is rising among consumers. The push for plastic substitution is gaining momentum and brings new opportunities for development and innovation in the fiber-based packaging industry. Clients, partners, laboratories and research centers support the Group in finding fiber-based solutions with functional barriers that can substitute plastics while contributing to a circular economy.



Circularity

Circular Economy	p. 27
Raw materials	p. 29
Responsible sourcing	p. 31
Products	p. 33
Customer satisfaction	p. 36



95%

Of fiber-based raw materials is made from paper for recycling.
Our products are all renewable, recyclable and actually recycled.



100%

Of virgin market pulp is purchased from certified and/or controlled sources that ensure the sustainable management of forests.

Circular Economy

The commitment of RDM Group to a responsible management of resources is crucial throughout the entire value chain, both upstream and downstream. This virtuous cycle starts with renewable raw materials and culminates with the production of recycled and recyclable products.

The circular economy is a model of production and consumption that promotes a responsible and efficient use of our planet's finite resources. As opposed to the linear "take-make-use-dispose" system, it stimulates the creation of a closed-loop to minimize material consumption and waste production. The recyclability of materials used plays a crucial role in developing sustainable consumption patterns. Promoting a culture of recycling is a critical step in ensuring the success of a circular economy model.

The circular economy's regenerative system can enhance and conserve material value, even when a product has served its purpose and has come to the end of its useful life. For the fiber-based packaging industry, recycled products have a leading role in the transition of the whole sector toward increased sustainability and circularity. For fiber-based packaging in the European Union (27 members), an 82.3% recycling rate has already

been reached (2019 Eurostat data), and the goal is to reach 85% by 2030.

The circular economy is the central theme in the European Union's strategy for sustainability and competitiveness, as well as the primary trend in the packaging sector. In March 2020, the European Commission approved the Circular Economy Action Plan, which is one of the main building blocks of the European Green Deal, Europe's new blueprint for achieving sustainable development.

The requirements for packaging are being reviewed within the framework of the revised packaging waste directive. The aim is to standardize national measures on the management of packaging while preventing excessive packaging and minimizing packaging waste. This can be achieved by increasing the recycled content in packaging materials and improving designs to promote reuse and recycling.



RDM GROUP IS PART OF THE 4EVERGREEN ALLIANCE

The 4evergreen Alliance is a cross-industry alliance of over 100 members representing the entire life cycle of fiber-based packaging. It aims to support the development of new technological solutions through product innovation and design, as well as the development of adequate recycling infrastructure and collection systems.

Moreover, the alliance aims to increase awareness of the benefits of using fiber-based packaging and thus facilitate more environmentally friendly choices at the consumer level. The goal of the alliance is to increase the overall recycling rate of fiber-based packaging to 90% by 2030. This effort aligns with the goals of the European Green Deal to promote economic growth while prioritizing environmental sustainability.

RDM Group joined the initiative at the very beginning, recognizing the importance of connecting the entire value chain of fiber-based packaging, from paper and cartonboard producers to converters, major brands, retailers, technology and raw material suppliers, as well as collection operators.

The activities of the alliance are organized within four work streams that focus on relevant aspects for fiber-based packaging:



In 2022, the 4evergreen Alliance developed a new set of "circularity by design" guidelines for fiber-based packaging. The focus is the recyclability of all products throughout the value chain, in terms of ease of collection, sorting and recycling, as well as ensuring that materials are actually suitable for recycling.

The alliance also reached several other milestones in 2022:

- » it launched the Fiber-Based Packaging Recyclability Evaluation protocol, a tool set to establish a uniform and enhanced framework for assessing the recyclability of packaging products throughout Europe;
- » it released the Guidance on the Improved Collection and Sorting of Fiber-Based Packaging for Recycling.

RDM Group plays an integral part in the circular economy through its business model. The company transforms paper for recycling into brand new board products, giving new life to valuable materials and creating renewable and recyclable cartonboard that can be easily recycled by consumers. This allows the cartonboard to be returned to the system to be made into new products over and over again.

Although it is best if cartonboard is recycled after use, fiber-based board is biodegradable and would not have a detrimental impact if accidentally dispersed in the environment.

This circular model creates a closed-loop system in which waste is minimized and resources are conserved.

1,190,000 tons of paper for recycling processed in 2022



Considering that the average European citizen consumes about 73 kg (160 lbs) of paper and cartonboard per year (2020 Eurostat data), in 2022, RDM Group's mills gave new life to paper for recycling generated by more than 16 million people.

This is more than the paper and cartonboard packaging generated in 2021 by the entire populations of Sweden and Denmark combined.

Raw materials

Although recycled cartonboard may appear a simple product, its production involves intricate manufacturing processes, advanced production techniques and the blending of natural fibers with other materials.

As a recycled cartonboard company, the raw materials used are a crucial part of operations. RDM Group is committed to sourcing the highest quality recycled materials, which, combined with product quality procedures, ensures that our products meet our technical and quality standards.

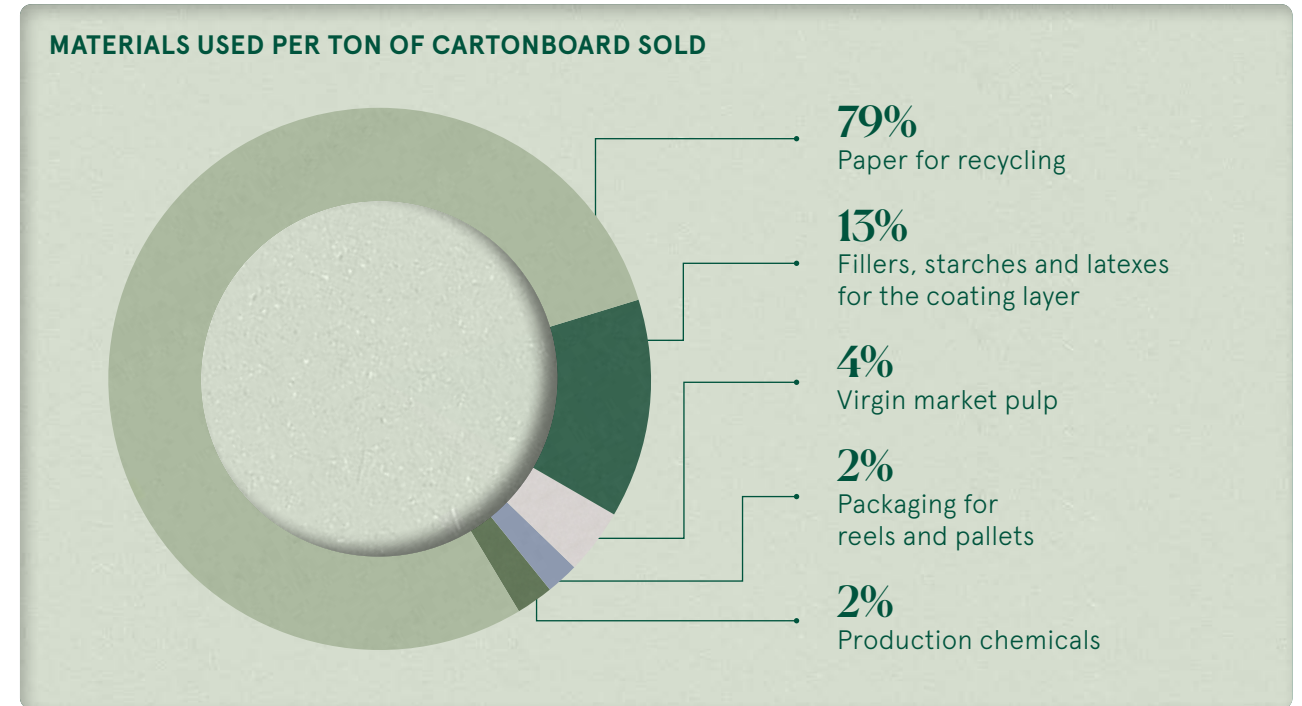
RDM Group mainly uses paper for recycling as its primary raw material, but the company also procures and utilizes other materials such as chemicals and mineral fillers and a small amount of virgin market pulp, mainly mechanical pulp, accounting for approximately 4% of the total amount of materials used in 2022.

Virgin market pulp is necessary in the production of recycled cartonboard to achieve the necessary physical and mechanical properties required as a packaging material. The continuous recycling process can indeed cause cellulose fibers to lose some key characteristics, including those affecting its recyclability.



99%
of the overall materials consumed is used for our cartonboard

1%
is related to process auxiliary materials



COMPOSITION OF FIBER-BASED RAW MATERIALS

All Group production units / 2022



95%

Paper for recycling



5%

Virgin market pulp

Paper for recycling comes from:

- » **Post-Consumer Material:** community and household recycling collection;
- » **Post-Industrial Material:** unprinted/printed production scrap collected from the converting and printing industry.

Once the paper for recycling reaches our premises, it follows a standard quality assessment process that includes visual checks by our experts and laboratory analyses to assess its quality. After acceptance, it is stored in raw material yards by grade, following the European Standard EN 643.

A circular business model must use raw materials in a way that will then lead to recycling in later production cycles. For such a model to be fully sustainable, every stage of the process must be sustainable, starting with the origins of raw materials. All of our virgin market pulp is either certified according to FSC® and/or PEFC standards or fulfills the requirements for FSC® controlled wood.

These standards and requirements are the most globally used and recognized and ensure that the raw material comes from sustainable supply chains with a controlled chain of custody. They aim to ensure proper forest management and material traceability along the entire supply chain.

The Group regularly undergoes external audits by independent certification bodies that verify and certify that management systems comply with the FSC® and PEFC standards.

RECYCLABILITY OF FIBERS

According to a study conducted by the Graz University of Technology in Austria in 2021, fiber-based packaging material can be recycled at least 25 times without losing its mechanical or structural integrity. The study researched some factors including the material’s innate strength, crush resistance and swelling capacity.

The results show that paper and board folding boxes represent a highly sustainable packaging solution that can seemingly be recycled multiple times. The number of recycling cycles is limited mainly due to the paper for recycling collection rate and the losses that occur during the cleaning of fiber materials.



Responsible sourcing

The corporate Sourcing and Procurement Department maintains a consistent approach to purchasing goods and services for all manufacturing sites. Local purchasing functions work closely with the Group function, which coordinates the work of category managers and buyers by setting purchasing standards for each product category.

This organizational approach aims to organize and optimize the purchasing of specific procurement categories, i.e., pigments, binders, starches, etc. Each category has its own sourcing strategy, which involves selecting and managing suppliers, negotiating contracts and continuously improving processes to drive operational efficiency. This approach was strategically put in place to optimize spending, mitigate the potential risk of shortages, better allocate volumes among mills and build stronger, more enduring relationships with suppliers.

RDM Group places great importance on responsible and transparent sourcing practices with reliable business partners who align with company values. The Group exclusively procures materials and services from companies that share the Organization's commitment to responsible business, an essential part of operations that guarantees the sustainable development of products and supports a healthy economy. In supply contracts, the Group presents its expectations concerning integrity, which includes business activities that comply with the Code of Ethics, respect for human rights and reduction of environmental impact. The Group reserves the right to terminate the business relationship should it become aware of conduct that does not comply with the law or its Code of Ethics.

Depending on the product category, suppliers undergo a pre-qualification and qualification process that includes screenings of specific social and environmental requirements. The company also verifies that suppliers comply with the lawful hiring of workers and social security obligations, as well as the presence of any disputes regarding health and safety, the environment and corruption.

This screening focuses on all relevant product categories, including service contractors. Virgin market pulp suppliers are subject to a specific qualification process concerning the FSC® and PEFC certification schemes.

In addition to this screening, suppliers are subject to a performance assessment. This is done through an internal survey that evaluates the level of satisfaction for the service provided and the quality standards delivered.

The Group is working to upgrade and further strengthen its supplier qualification process. The goal is to assess and qualify key suppliers according to ESG criteria for all relevant product categories by 2025. This will give the company greater control over the supply chain, meet higher standards of qualification, and push suppliers to improve their own sustainability performances.



Guido Vigorelli

Chief Procurement Officer

“We believe that sustainable sourcing is not only a responsible choice but what enables us to generate lasting value for our stakeholders and the planet.”

THE EVOLUTION OF EUROPEAN LEGISLATION ON SUPPLY CHAINS

EU companies operate in intricate environments and rely on global value chains. It can be challenging for companies to identify and address risks associated with human rights violations or environmental damage within their value chains.

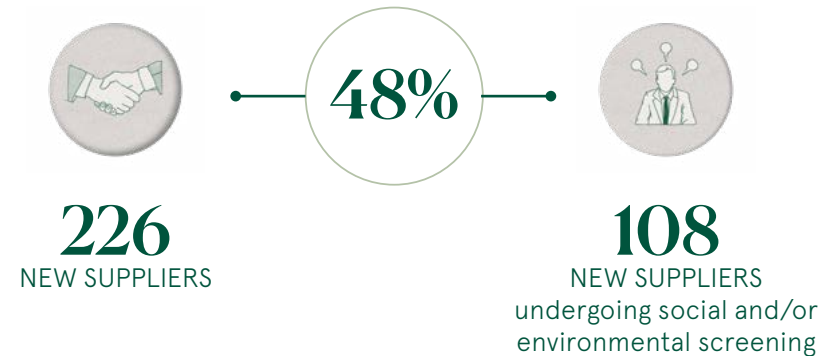
On February 23, 2022, the European Commission proposed the **Corporate Sustainability Due Diligence Directive (CSDD)** to establish a comprehensive framework to enforce corporate sustainability. In December 2022, European countries reached a consensus on an EU-wide supply chain law and the next step in implementing it will take place in May 2023 at the European Parliament. Once adopted, Member States will have two years to incorporate the directive into their national laws.

The objective of the proposal is to encourage sustainable and responsible conduct by companies throughout their global value chains, including their own business operations. Companies will be required to:

- » **identify and address any human rights violations in their operations, such as the use of child labor and worker exploitation, as well as their effects on the environment, including pollution and the depletion of biodiversity;**
- » **integrate due diligence into company policies and management systems, monitor their effectiveness and transparently communicate them to the public;**
- » **establish procedures for managing complaints along the supply chain.**

NEW RELEVANT SUPPLIERS UNDERGOING SOCIAL AND/OR ENVIRONMENTAL SCREENING

All Group companies / 2022



New suppliers are those entities the Group purchased from for the first time in 2022 in an amount equal to or greater than €5,000. Suppliers of non-strategic product categories are excluded. 108 out of 226 new suppliers were screened according to socio-environmental criteria.

Nearly all the company's suppliers are located in countries that are considered low risk for human rights violations based on both the annual "Freedom in the World 2022" report by Freedom House and "The State of the World's Human Rights 2021/22" report by Amnesty International. Beyond guaranteeing environmental sustainability, the purchase of virgin market pulp from FSC® or PEFC-certified sources also guarantees the respect of human and labor rights.



Products

BUSINESS AREAS

WHITE-LINED CHIPBOARD (WLC)

recycled coated cartonboard for packaging made of recycled fibers. Finished products come in reels or sheets cut to customer size.

TWO PRODUCT SEGMENTS

1. LINER: coated cartonboard with grey back and low grammage (140 to 250 grams per m³). It is converted in combination with other paper to manufacture packaging requiring high quality printing.

2. GD / GT: multi-layer coated cartonboard with grey/white/manilla or kraft back (240 to 500 grams per m³) used as sole material for end-user packaging requiring excellent printability and strength.

MARKETS

WLC serves a broad range of end-use segments such as:

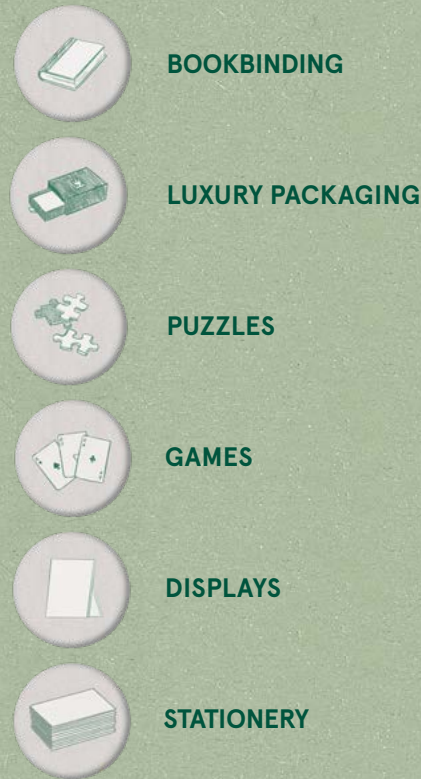


SOLID BOARD

Recycled cartonboard in high grammages and thickness well suited for specialty products, luxury packaging and the publishing market. Finished products only come in sheets.

MARKETS

Solid Board serves a broad range of end-use segments such as:



PRODUCT DEVELOPMENT AND INNOVATION

The packaging industry is undergoing a substantial transformation, and RDM Group is at the forefront of this evolution. Through a commitment to innovation and product development, the company is actively pursuing ways to strengthen its product portfolio, with a focus on renewable, recyclable, and recycled solutions that align with the sustainability goals.

The packaging industry is no longer just about protecting and presenting products, but also about renewable and recyclable solutions that can meet society's needs.

As environmental awareness spreads among consumers, the demand for environmentally friendly and easily recyclable packaging is greater than ever. The push to replace plastic presents new opportu-

nities for innovation in the fiber-based packaging industry. Cartonboard has emerged as a promising alternative to plastic packaging. RDM Group intends to meet the challenges of this demand by investing in the development of new barrier solutions that are fully integrated with the fiber-based material structure of cartonboard. These innovations will be designed to preserve the recyclability of the fiber-based product.

In order to achieve this, RDM Group engages with clients and works closely with suppliers to find new solutions to enhance barrier properties in a way that preserves the circularity of products.

Another focal point of RDM Group's innovation efforts is the development of lightweight cartonboard, which would reduce the weight of the materials while

FIBER-BASED INNOVATION

Consumer awareness of limited natural resources, environmental impacts of products, and Corporate Social Responsibility, is growing.

These megatrends are pushing large brands and retailers to look for increasingly sustainable solutions that can reduce the environmental impacts of packaging. Many companies are focusing on making their supply chain more sustainable with renewable packaging solutions that are recyclable and made with recycled materials.

Currently, plastic-based solutions are the primary application used in introducing barrier properties in cartonboard packaging materials. However, research is underway to find innovative bio-based solutions. Overall, there are a range of options available to develop sustainable barrier coatings.

By combining these solutions with a focus on recyclability and minimizing environmental impact, the industry can meet the demands of consumers and contribute to a more sustainable future.

ESKA BICOLOURS

Eska Bicolours is a game-changer in the world of packaging. Its three-layer construction with a vibrant colored core surrounded by interchangeable colored liners offers unparalleled flexibility for creative manufacturers seeking to differentiate their products.

The board's exceptional rigidity ensures that it retains its shape and form even with frequent handling and transportation. It offers infinite possibilities for printing, shaping, and cutting, making it a versatile choice for a range of packaging applications.



maintaining performance and functionality. This will help reduce the environmental impact of packaging by decreasing the amount of resources used and lowering transportation costs. To do this, RDM Group is improving its "board recipe" and structural design and strengthening relationships with univer-

sities and external research centers. The Group has taken a proactive and transparent approach to innovation for many years. This has involved collaborating with trade associations, food safety authorities, and other stakeholders, including coating and ink manufacturers and entities in the printing and converting industry.

PRODUCT SAFETY AND QUALITY

Quality is of the utmost importance to RDM Group. Alongside the company's Quality Control and Technical Customer Service teams, it strives for the continuous monitoring and refinement of quality control processes, to maintain its reputation as a trusted provider of high-quality cartonboard products. All aspects of the process demonstrate a commitment to excellent customer service and delivering products that are safe, reliable, and of the highest quality.

Quality is particularly crucial when it comes to food safety. To ensure that products are manufactured in accordance with the safety regulations for food contact materials, the Group follows a rigorous quality control process.

This process is in place to preserve and protect the final packaged products and their characteristics, which could influence consumer perception. A precise monitoring system ensures the quality and food-safety requirements are met at all stages of the production cycle, from procurement and production to shipping. This also includes developing new methods for monitoring incoming raw materials and improving material sorting to better identify potential contaminants from the source.

RDM Group complies with legislation that protects the health of workers, customers and the environ-

ment, including EU Regulation No. 1907/2006 REACH, which guarantees that substances suspected as carcinogenic, mutagenic, toxic for reproduction, PBT (persistent, bioaccumulative and toxic) or vPvB (very persistent and very bioaccumulative) are well below the legally permitted concentration.

RDM Group's Quality Control teams conduct rigorous checks with advanced testing and inspection techniques to identify any defects, inconsisten-

ISO 9001 CERTIFICATION

In 2022, the Paprinsa Mill in Spain achieved its ISO 9001 certification. All RDM Group's production facilities now have a quality management system certified in accordance with the ISO 9001 standard.

This certification demonstrates a systematic approach to establishing and maintaining quality, customer focus, and continuous improvement.

cies, or potential hazards that could compromise the quality of the products. In the event that a customer encounters an issue with a product, the Technical Customer Service team works closely with them to understand their needs and provide technical assistance.

QUALITY MANAGEMENT SYSTEM

RDM Group's quality management system is struc-

ture to address critical issues quickly and effectively, immediately taking diagnostic and corrective actions. This is done through a set of processes and procedures designed to ensure that an organization's products consistently meet customer requirements and expectations.

One critical aspect of RDM Group's quality management system is the traceability of materials throughout the entire production cycle. Tracking and identifying the raw materials, substances and products used in each production step makes it possible to quickly identify defects and withdraw defective lots before they reach the market.

RDM Group carefully collects and manages feedback on quality and customer satisfaction. Procedures ensure that all reports and complaints are tracked, documented and managed thoroughly and systematically. By analyzing feedback and carefully performing root cause analyses, the Technical Customer Service team is able to identify areas of improvement and take corrective actions.

Open and transparent communication with clients, keeping them informed of internal actions in response to their feedback, is fundamental and helps to continuously improve products and services based on feedback.

ZERO RECALLS

Zero recalls or withdrawals from the market due to food safety risks in 2022.

THE STEPS OF THE QUALITY CONTROL PROCESS



01.

ANALYSIS AND CONTROL OF RAW MATERIALS

Analyses are performed on the raw materials used, including specific control checks for pollutants or biological contaminants and to detect and mitigate potential inorganic contaminants.



02.

TREATMENT AND CLEANING OF RAW MATERIALS

The treatment and cleaning process of raw materials, and the subsequent production phase, are designed to ensure that the cartonboard intended for food applications, under normal or foreseeable conditions of use, does not transfer components in quantities that may constitute a danger to human health or deteriorate the organoleptic properties of the food.



03.

VERIFICATION OF CHEMICAL-PHYSICAL CHARACTERISTICS

Through laboratory analysis, the chemical-physical characteristics of products intended for food contact and other important properties such as odor, are verified downstream in the production process.



04.

VERIFICATION OF SUITABILITY FOR STORAGE AND TRANSPORT

Suitability checks are also conducted on materials used for product packaging, primarily polypropylene. Additionally, specific procedures are implemented for the storage of these materials in the warehouse and for the control of transport methods. These procedures ensure products maintain quality throughout distribution and up to delivery.



05.

CERTIFICATION AND COMPLIANCE

All of RDM Group's products intended for food packaging are certified by the authoritative ISEGA laboratory, attesting to their food safety and compliance with EU Directive No. 1935/2004. All mills follow the Good Manufacturing Practices (GMP) established by EC Regulation No. 2023/2006 for materials and articles intended for food contact.



06.

TRANSPARENCY

The compliance of products is verified with customers before any purchase decision is made. The company provides customers with all necessary product safety information through declarations of conformity.

Customer Satisfaction

OPEN COMMUNICATION WITH CUSTOMERS

RDM Group believes that building strong relationships with its customers is key to business growth.

Fostering and maintaining a dialogue with customers is an ongoing process that requires active listening and continuous engagement. The Group's Sales Team is always available and responsive to customer needs and looks for ways to improve the products and services provided based on feedback.

In addition to the direct communication with the sales representatives, customer feedback is gathered twice a year in a customer survey. The aim of the survey is to understand customer expectations and develop better long-term relationships. The survey includes both quantitative and qualitative questions to provide a more comprehensive understanding of each customer's opinion and experience.

RDM Group uses the feedback collected from surveys and other informal channels to identify trends and areas where improvements can be made.

RESULTS OF THE LATEST SURVEY

The latest survey revealed positive and improved feedback regarding product quality, customer service levels and customer-facing teams.

1,679

customers contacted

47%

response rate

7.45/10

customer rating (7.18 in 2021 survey)

COMPLAINTS

In 2022, the Group worked to further improve its products and services by strengthening quality management. As a result, there was a 21% decrease in the number of complaints compared to the previous year.

The Technical Customer Service team played a crucial role in achieving this improvement, with a primary focus on guaranteeing that

responses were assessed, complete, and timely, thereby ensuring even greater clarity for customers.



Pierre-Yves Corbière
Chief Commercial Officer

"At RDM Group, we understand that sustainability and customer satisfaction are two sides of the same coin. By prioritizing sustainability in everything we do, we can meet the growing demand for environmentally responsible products and enhance our customers' satisfaction."

Environment



Energy	p. 38
Emissions	p. 41
Water	p. 43
Waste	p. 45



12%

Reduction of specific wastewater discharges since 2021. Using renewable, clean energy for all the company's operations is a major goal for RDM Group and it will continue improve efficiency in its energy use.



5%

Reduction of energy intensity since 2021. Reducing emissions is one of the highest priorities, and RDM Group will persist in its efforts to reduce emissions and mitigate environmental impacts.



28%

Of the Group's electricity purchased comes from certified green sources corresponding to over 15,000 tons of CO₂ emissions.

Energy

EUROPE IS MOVING TOWARD CARBON NEUTRALITY

According to the World Economic Forum Global Risks Perception Survey 2021–2022, five of the top ten most severe long-term risks on a global scale are related to climate change – the top three being “climate action failure,” “extreme weather events” and “biodiversity loss”.

In December 2019, the European Commission presented the “Green Deal,” a new growth strategy that aims to transform the EU into the first climate-neutral continent by 2050. In July 2021, the “European Climate Law” entered into force (Regulation EU 2021/1119) to transform this political commitment into a legal obligation. Through this regulation, the European Commission is establishing the legal framework to achieve climate neutrality by 2050. It has also set an interim target of a minimum of at least 55% reduction of net greenhouse gas emissions by 2030, compared to 1990 levels.

The regulation aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part.

The paper industry is an energy-intensive sector that requires large amounts of both electrical and thermal energy. The cartonboard manufacturing process requires a significant energy input for the rapid dewatering and drying of the formed cartonboard sheet; in less than two minutes, the water content goes from 99% to about 7% in the finished product.

While efficient resource management is crucial from both an economic and environmental standpoint, RDM Group acknowledges the externalities of its operations, including those that arise from using fossil fuels. Thus, it pays careful attention to mitigating its environmental impact.

RDM Group’s energy policy is centered around optimizing the efficiency of its mills through the use of high-efficiency power plants. Most of the mills have an energy cogeneration plant that uses the most advanced energy conversion technologies to simultaneously produce electrical and thermal energy, while minimizing inefficiencies. Thanks to the effective recovery of heat, the yields obtained in the power plants are far higher than those required by European Directive No. 2004/8/CE on the promotion of cogeneration.

The operational results of cogeneration plants are subject to periodic performance certification by government agencies, according to procedures established by the European institutions. All of the Group’s power plants are powered by natural gas, with a few exceptions. At the Arnsberg mill in Germany, a fuel switch project is in the works that will

replace coal with natural gas and install a new high-efficiency cogeneration plant. In 2022, the mill continued preparatory activities necessary for the more detailed analyses required to complete the project. The next steps for 2023 will concern legal, environmental and financial studies to ensure consistency with the plan to phase-out coal from the German government and the incentive mechanisms related to gas-fired cogeneration.

In Hoogezand, Netherlands, RDM Group runs a Waste-to-Energy (WTE) plant that is part of the Group’s solid board operations. The plant produces syngas with a gasification process applied to “refuse derived fuel” (RFD), which originates from the in-house pulping of paper for recycling. The plant thus uses part of the waste generated onsite as fuel to generate the steam needed in production. Before being used internally as fuel, the waste is shredded and sorted to recover metals that can be further recycled by other companies. This process saves approximately 10,000 tons of CO₂ emissions compared to fossil-fuel-based alternatives.

Some of the residue from the WTE plant, which is composed of different types of ash, is used in concrete flooring, and the rest is properly disposed of. The WTE plant is an effective solution, for RDM Group and the entire recycled fiber sector, for tackling two important environmental issues: energy and waste.

The company has installed two brand new gas-fired boilers at the Sappemeer mill in the Netherlands. These two boilers can produce 100% of the steam

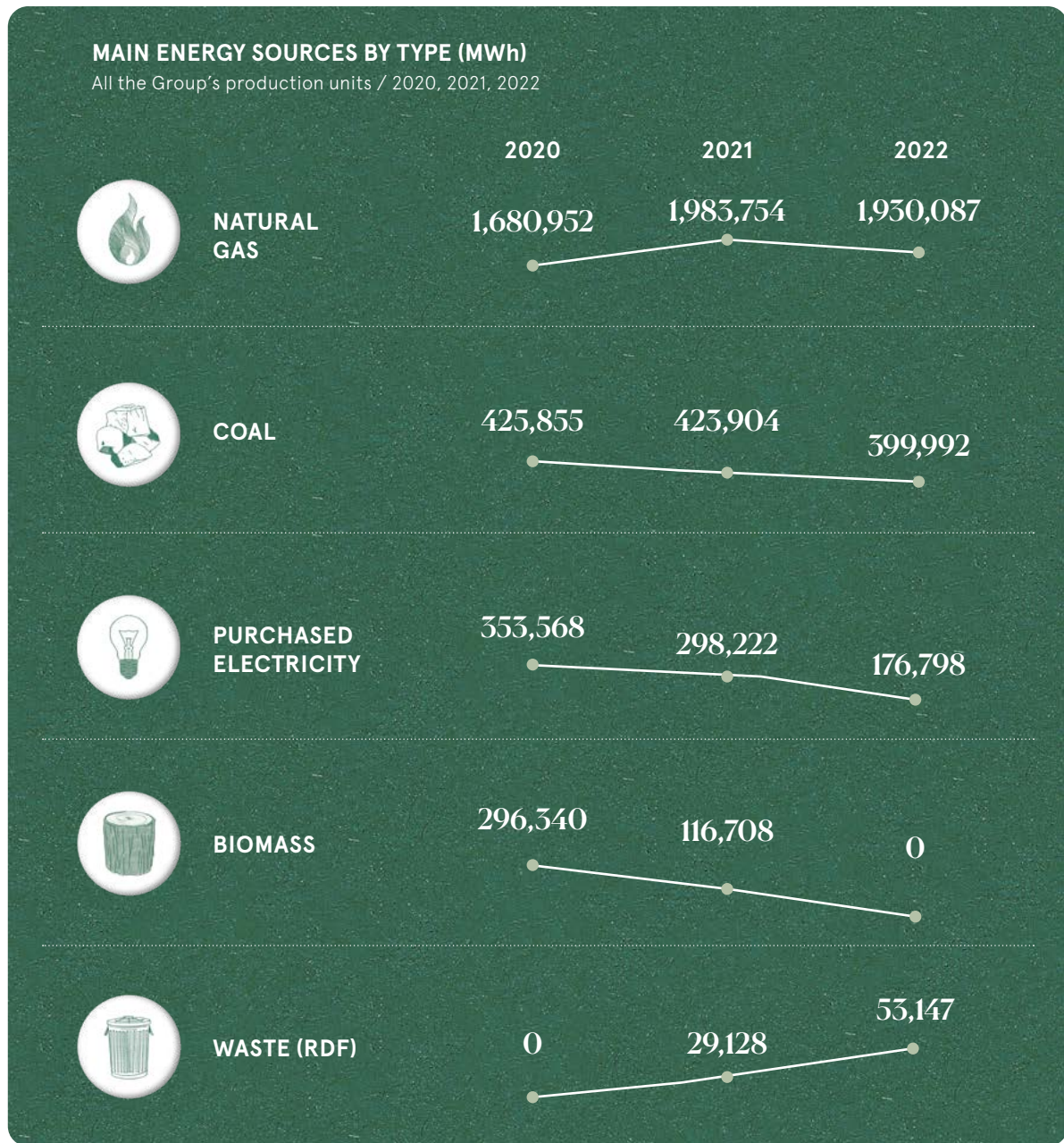
needed in the production process. The Group is also in the process of installing a brand new e-boiler in the Netherlands.

The latter solution will be used as a “buffer” for the national Dutch electric system to absorb the excess of electricity supply in the grid. Looking ahead, RDM Group’s Dutch operations are considering investing in a new full-scale biomass-fed boiler house that will use the residue of the digesting of the organic fraction of unsorted urban waste. This boiler will supply steam to the mill and distribute excess heat to the local community.



ENGAGEMENT ACTIONS

Engaging with the local community prior to important upcoming projects is a customary practice for RDM Group. The Dutch mills involve the various stakeholders, including the local community, in meetings and workshops for upcoming projects, including the biomass boiler. During these meetings, stakeholders are presented with the projects and can voice their suggestions and recommendations, such as those concerning the project’s location and layout. These are taken into consideration during project implementation.



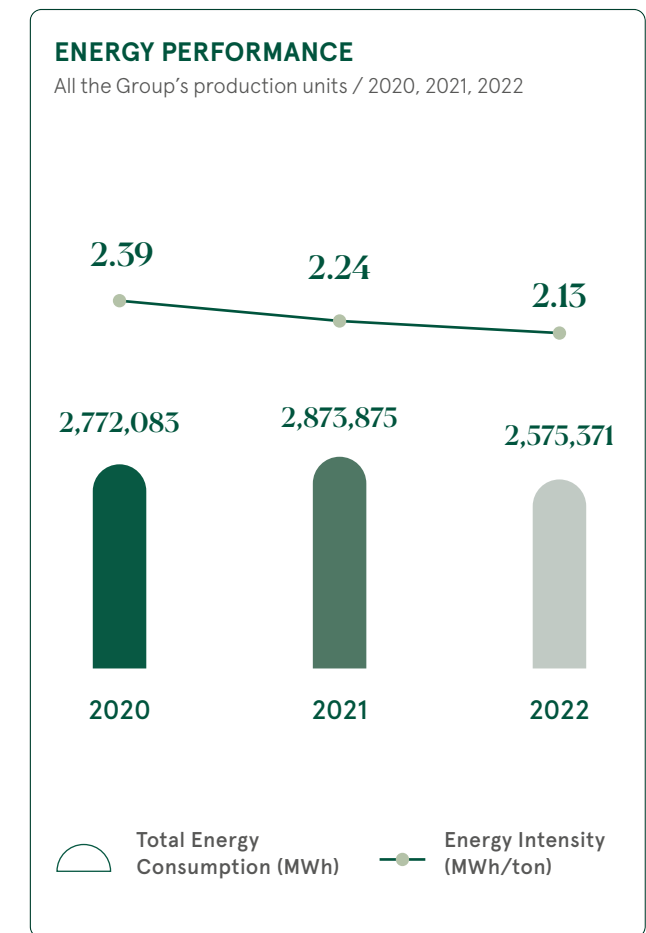
The new boiler at the Santa Giustina mill in Italy, which was installed in 2021, began operating at expected efficiency levels from February 2022. The new boiler more efficiently produces the steam needed in the manufacturing process, while lowering the environmental impact thanks to a significant reduction in NO_x emissions.

In October 2022, the installation of a new gas-fired cogeneration power plant at the Ovaro mill was successfully completed. This major investment by the Group was made to modernize the mill, allow for greater plant efficiency, a reduction in emissions, as well as a reduction in water withdrawal. End of 2023, the Group will start replacing the cogeneration plant in Barcelona. The company will build a new plant that is more tailored to the energy needs of the production process, thus reducing the amount of electricity currently supplied to the national grid.

In some of the cogeneration plants, internally produced electricity is supplemented with purchased electricity from the national grids, when necessary, to meet the total energy needs of the mills. In 2022, the Group purchased 177 thousand MWh of electricity from the grid, of which almost 28% is certified from renewable sources, corresponding to 15,342 tons of CO₂ avoided. In 2023, the Group is planning to extend the purchase of "guarantees of origin" to other plants for additional green electricity.

Liquefied Petroleum Gas (LPG), propane and diesel are also used for internal material transport and handling. In 2022, there were no significant changes in the specific consumption of these fuels compared to the previous years. After the sale of the virgin board mill of La Rochette in 2021, the Group no longer uses biomass as fuel.

Compared to 2021, total and specific energy consumption decreased thanks to the energy efficiency improvements in the Group's mills and power plants. This achievement was possible despite the commercial standstills that occurred toward the end of 2022 and the interruption of business at the Blendecques and Villa Santa Lucia mills, which caused inefficiencies from an energy standpoint.



ENERGY MANAGEMENT

To guarantee the efficient management of energy and reinforce the continuous improvement process, RDM Group’s Energy Management operations are constantly working to improve the energy performance of the mills.

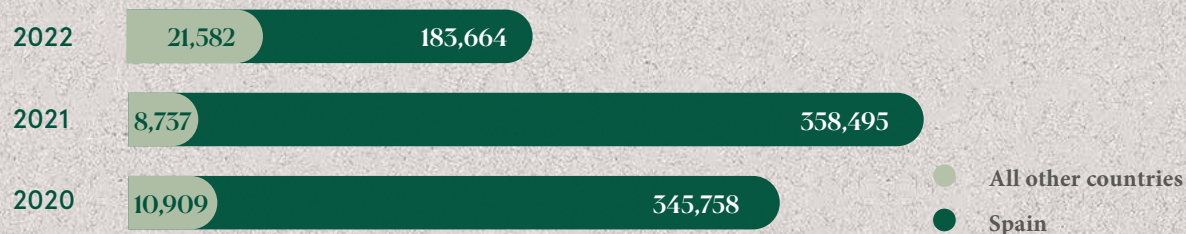
RDM Group believes that certified management systems are an essential tool for efficiently managing energy resources and optimizing costs. Seven of the Group’s board mills already hold the ISO 50001 certification, and the headquarters in Milan was also certified in 2021, demonstrating the Group’s commitment to sound energy management practices throughout the organization. The Group has a clear ambition to extend this standard to all of its mills. The energy policy is a formal pledge to minimize energy consumption, conserve resources, and recover secondary thermal energy. The policy underlines the Group’s strong commitment to sustainable energy management.

RDM Group actively cooperates with national grid security systems to ensure a safe and reliable supply of electricity to the grid. The mills follow strict regulations for electrical load management and interruptibility services on a national level, offering the possibility to disconnect in the case of imbalances between electricity demand and supply in the grid. By actively participating in these efforts, the Group helps to maintain a stable and resilient electrical grid, benefiting both the business and the wider community.

Between 2020 and 2022, RDM Group supplied almost 1 GWh of electricity to national grids, with the majority (96%) being supplied to the Spanish national grid. The local power plants were intentionally designed to generate excess electricity beyond the mills’ requirements. This decision was influenced by incentive plans from the Spanish government that favored gas-fired cogeneration plants.



ELECTRICITY SUPPLIED TO THE NATIONAL GRIDS (MWh)



Emissions

The paper industry requires significant amounts of electrical and thermal energy, which generates emissions and pollutants. At the beginning of 2021, RDM Group committed to a long-term goal of reducing the greenhouse gas emissions of its operations.

As part of the 2020 – 2030 Sustainability Plan, RDM Group’s goal is to reduce its Scope 1 and Scope 2 CO₂ equivalent emissions per ton of net salable production by 30% by 2030.

To achieve this goal, RDM Group has invested in high-efficiency technologies, to improve the performance of existing plants and the use of energy sources with a lower environmental impact.

In 2020, the plan was to purchase more green electricity, which was achieved in both 2021 and 2022 with the purchase of only 100% green electricity for the Italian board mills, as well as for the sheeting center of Magenta (Italy) sheeting center and the headquarters in Milan. Thanks to the purchasing of specific “guarantees of origin” that certify the renewable source (solar, wind and hydroelectric power) of electricity, these indirect greenhouse gas emissions have been fully compensated. It is part of the long-term Sustainability Plan to purchase certified “green” electricity for all sites.

The accurate monitoring of greenhouse gas emissions, the development of a system for the continuous improvement of energy efficiency and the ongoing mitigation of emissions have enabled the Group to reduce CO₂ emissions and atmospheric

pollutants per ton of production over time. All production sites are part of the EU Emission Trading System (ETS), which establishes the purchase of carbon credits for greenhouse gas emissions. The EU uses these financial resources to fund interventions to reduce or contain emissions.

28% of the electricity purchased by RDM Group in 2022 was certified from renewable sources, avoiding over 15,000 tCO₂e.



Gianluca Scaglioni
Chief Operation Officer

“In light of the pressing environmental challenges that the world is currently facing, it falls upon us to take resolute steps towards managing our impacts. We are committed to utilizing resources such as water and energy responsibly and ensuring responsible waste management.”



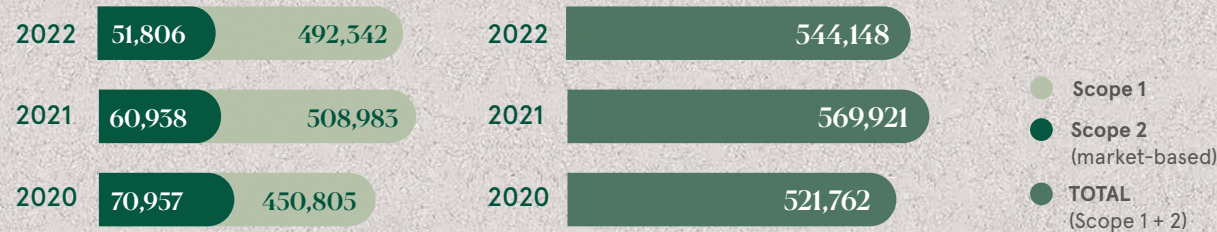
Although the Group's overall emissions decreased by 5% compared to last year, in 2022, RDM Group's carbon intensity increased by 1% compared to 2021. However, with the methodological approach

used for the long-term goals, which excludes the former mill of La Rochette, the Group's carbon intensity for 2022 is 1% lower than 2021 (like-for-like basis).

The use of renewable materials in the manufacturing process allows RDM to make a significant contribution to the green economy. Fiber-based products are able to store CO₂ (carbon storage) thanks to the natural growth process of forests and plants. Carbon dioxide is therefore incorporated into recycled products, which contributes to the circular process of fiber recovery and recycling. With cellulose-based products, the company offers customers and end consumers sustainable alternatives with enhanced environmental performance compared to products made with fossil fuels or non-renewable materials. Some of the emissions generated by the company's processes, such as sulfur oxides (SO_x), nitrogen oxides (NO_x) and particles, can directly affect air quality and are therefore subject to strict limitations by environmental protection authorities. RDM Group monitors all atmospheric emissions on a continuous basis, ensuring that they comply with all of the legal requirements in the countries where it operates.

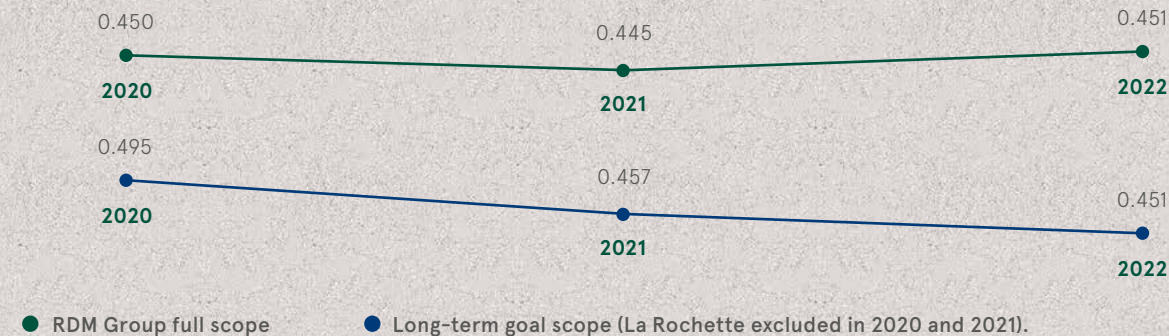
The total amount of NO_x and carbon monoxide emissions has significantly decreased compared to 2021, due to more efficient energy equipment (i.e., new boiler in Santa Giustina, new cogeneration plant in Ovaro) but also because of the stops in operations in Villa Santa Lucia and Blendecques. With the new investments, there should be a continuous reduction in those emissions over the years.

TOTAL DIRECT AND INDIRECT GREENHOUSE GAS EMISSIONS (tCO₂e)

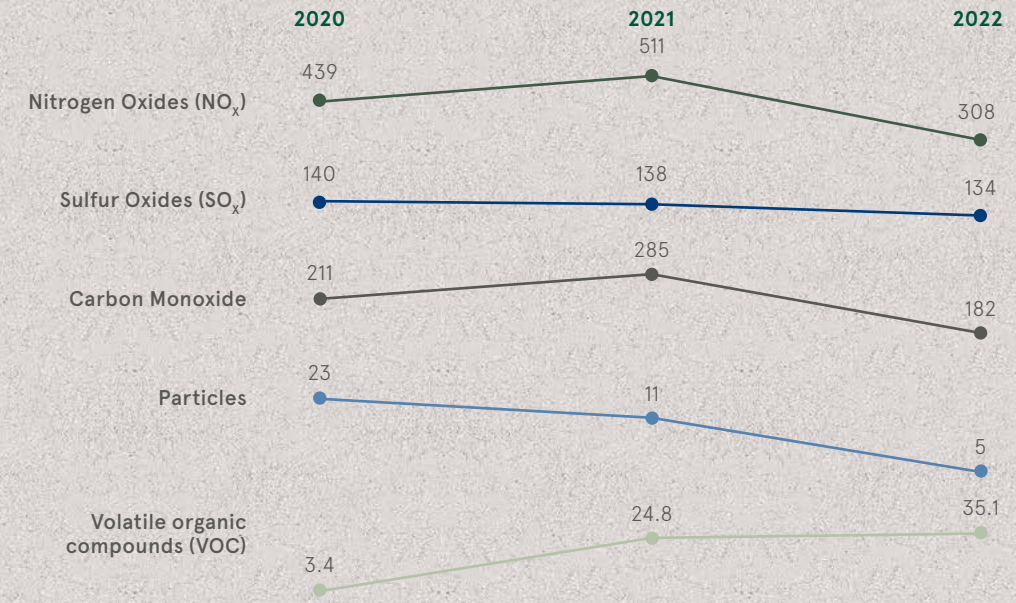


Scope 1: direct emissions of CO₂ equivalent deriving from operations that the Group directly owns or controls.
 Scope 2: indirect emissions of CO₂ equivalent related to the electricity the Group purchases externally.

SPECIFIC GREENHOUSE GAS EMISSIONS (tCO₂e/t)



OTHER ATMOSPHERIC EMISSIONS (t)



The figures are derived from continuous measurement systems, as well as from single periodic measurements that might determine fluctuations from one year to another. The figures refer to emissions from paper production and exclude those related to the electricity supplied to the grid.

Water

WATER WITHDRAWAL AND DISCHARGE

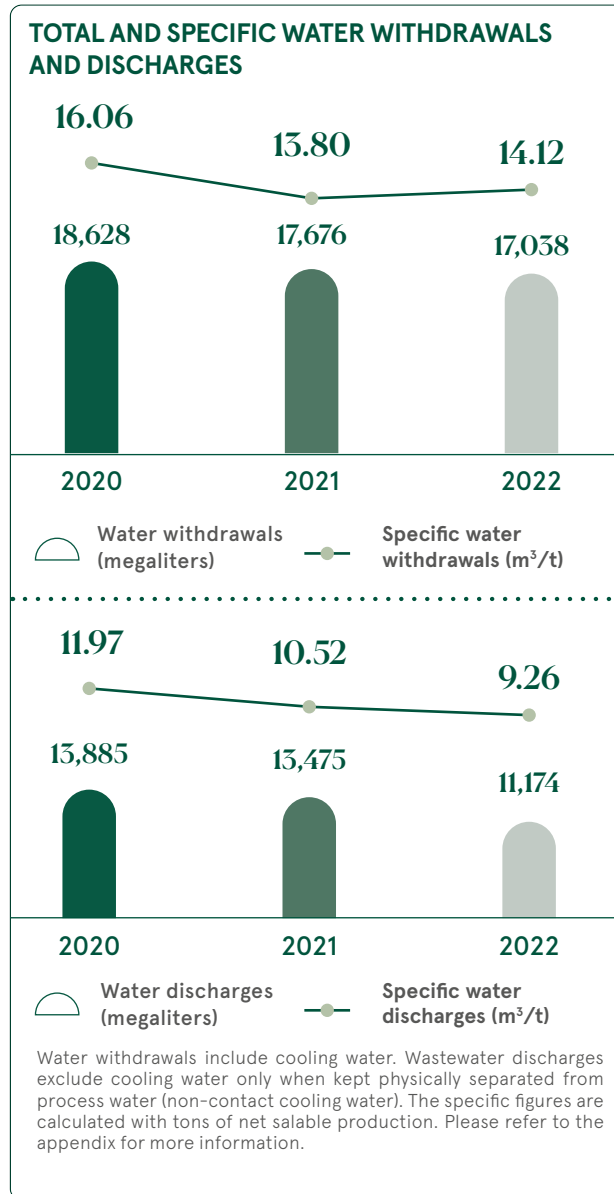
Water use is a key indicator for measuring the company’s environmental footprint and operational efficiency. RDM Group strives to reduce its impact on water sources and implement measures for the continuous monitoring of effluents to protect aquatic ecosystems.

The cartonboard industry requires significant amounts of water at various stages of the production process. Primary water usage is found in the pulping and cleaning process, as well as the sheet formation process. Water is also used to produce steam and to cool equipment.

RDM Group is committed to effectively managing this valuable resource. The challenges posed by water conservation are viewed as an opportunity for the entire organization to enhance water-use efficiency and reduce costs, both for the business and the environment.

As part of the 2020 – 2030 Sustainability Plan, RDM Group’s goal is to reduce wastewater discharges per ton of net salable production by 20% by 2030. In 2022, the KPI was reduced by 16% compared to the 2020 baseline, decreasing it from 11.06 m³/ton to 9.26 m³/ton.

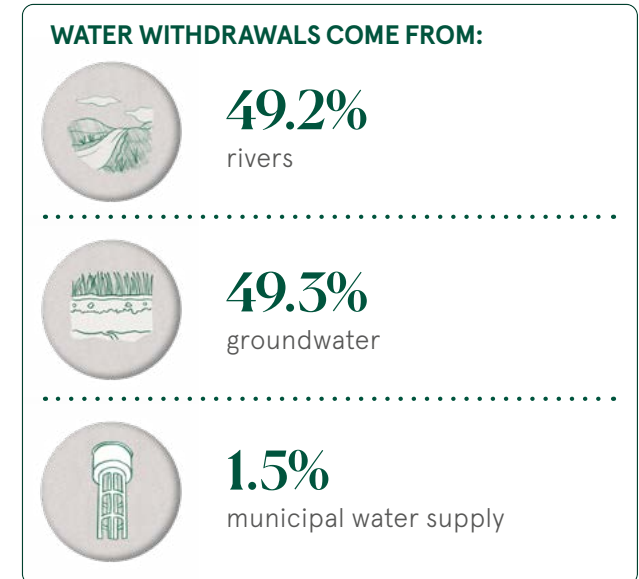
This positive trend can be attributed to a combination of factors, including the adoption of innovative technologies for treatment and reuse. The Group aims to consolidate these results while continuing to implement continuous improvements.



The company’s board mills are located near bodies of surface water and groundwater to provide a continuous water supply. The water is taken either through direct withdrawal or access to aquifers.

About 90% of the water withdrawn by the mills is returned to the environment, either into surface water sources after appropriate treatment or directly as non-contact cooling water. The remaining percentage is used for the product and evaporates during the production’s drying process.

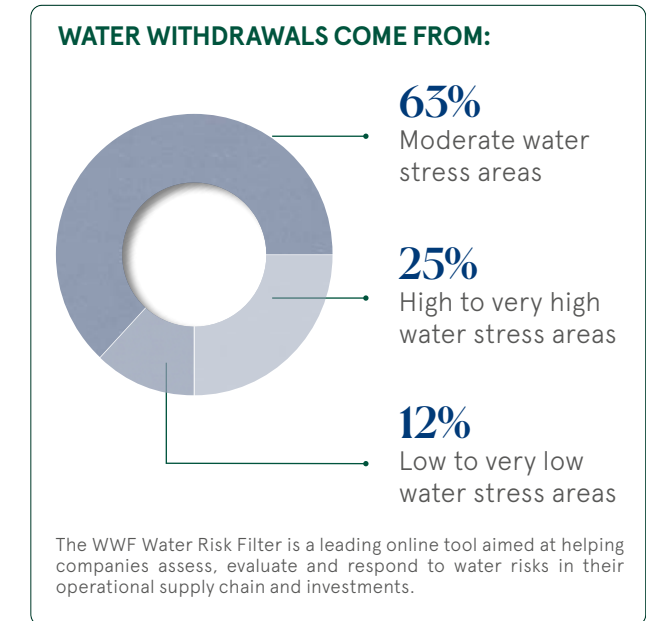
Although the mills have not experienced restrictions due to water shortage, RDM Group recognizes that a decrease in groundwater levels is a major risk to operations – even more so in the global context of climate change and increasing uncertainty about water resource quality and availability.



WATER STRESS

RDM Group is investing in preventing risks associated with water scarcity, while also trying to be proactive with expected regulations on water withdrawals and discharges that are increasingly stringent.

RDM Group applies the WWF’s Water Risk Filter to assess the level of water stress of an area where production units are located. The analysis found that the Group’s mills are located in geographical areas with varying levels of water stress.



RECYCLING AND REUSE

In light of the growing concerns over freshwater availability and the associated risks, the Group has made it a priority to reduce its impact on water resources and proactively contribute to the protection and sustainable management of global water resources.

To achieve this goal, the Group is focusing on the implementation of responsible water management practices, the recycling and reuse of water, investments in technological solutions aimed at further closing the process water loop, and the improvement of water discharge quality.

To give a few examples, the solid board mill of Hoogezand, Netherlands, has proudly managed to close its water loop and reuses all process water, with minimal discharge to an external treatment plant. The mill of Santa Giustina, Italy, has installed a new filtration system next to the wastewater treatment (WWT) plant, allowing for the further recovery of water to be filtered and reused in production instead of being discharged.

Moreover, in 2022, the Barcelona mill in Spain, finalized improvements on the tertiary treatment of its wastewater treatment plant. The tertiary treatment is based on the Dissolved Air Flotation (DAF) system, which is designed to remove suspended solids, oils and greases from wastewater using air bubbles. These bubbles get attached to the suspended particles in the water, causing them to float to the surface where they are removed by a skimming device. This system has helped improve the quality of water by reducing the total solid suspended to more than 50% and increased the percentage of water reused in the production phase.

In production processes, cooling water is frequently used as process water. However, when this water exceeds production requirements, it is returned directly to the environment provided that it has not come into contact with process water.

Over the years, the existing systems have been improved by using heat exchangers for the recovery of condensed steam heat. RDM Group has thus managed to reduce the specific freshwater withdrawals and increase the energy efficiency of production over time. In Ovaro, Italy, the new cogeneration plant switched its steam turbine-based technology to a gas turbine-based setting, which has laid the groundwork for a significant reduction in water withdrawals and discharges from 2023 onward.

Recycling and reuse remain the two key criteria that RDM Group intends to pursue to achieve its goal of reducing specific wastewater discharges.

PROCESS WASTEWATER TREATMENT

RDM Group is responsible for ensuring that the quality of water discharges from all its mills meets the required quality standards. This prevents significant negative impacts on the environment, public health and biodiversity. Wastewater discharges of cartonboard production contain suspended solids, organic residues — including dissolved fibers — and starches, but also inorganic material. Therefore, managing the wastewater discharges is a critical aspect of the cartonboard industry, and all the Group’s mills are equipped with wastewater treatment plants that use different technologies.

The treatment processes of the Group can involve chemical, physical, and biological methods to reduce the levels of organic and inorganic substances in the water. This makes the water suitable for

reuse in production, for discharging back into the environment or for further treatment and purification at external plants, depending on the respective type of treatment available locally. Compliance with legislation and environmental permits are monitored by the sites, through regular laboratory tests and reported to the environmental authorities.

In 2022, the Group performed targeted improvements to their wastewater treatment plants. The mill in Barcelona, Spain, installed a tertiary treatment stage of its WWT plant. The mill in Santa Giustina, Italy, performed substantial maintenance of the bottom-scraping system of the wastewater treatment tank and replaced the trays in the aeration tanks to improve the efficiency and functionality of the plant. At the mill in Hoogezand, Netherlands, a new bridge on the WWT plant was installed.

The Group carried out trials at the Dutch mills in using wastewater as an alternative raw material and

biomass source to produce biodegradable polymer. For 2023, RDM Group is also planning to install a temporary anaerobic reactor to enhance the current treatment capacity of the mill in Sappemeer.

The year 2022 also saw the operational stop of the mill in Villa Santa Lucia. This followed a decision from the public prosecutor’s office, which commissioned the company managing the external wastewater treatment plant where the mill discharges its own pre-treated process water. The external wastewater treatment company imposed new more stringent water discharge limits, which forced the mill to stop operations from August to December 2022. During this timeframe, the mill performed extraordinary maintenance activities and specific improvement investments, to enhance the efficiency of the internal biological treatment stage. In 2023, the mill is planning to further improve its WWT plant with the installation of new aerators and other solutions to improve the current water treatment performance.



Waste

RDM Group's vision of a circular economy places great importance on responsible waste management, which involves minimizing waste generation, maximizing waste recovery, and ensuring the efficient use of all materials.

As part of the 2020 - 2030 Sustainability Plan, RDM Group's goal is to increase the amount of waste sent for recovery from 73% (2020 baseline) to 90%. In 2022, the proportion of waste decreased to 68%. RDM Group is working to invert this performance and steadily increase the proportion of waste sent to recovery in the coming years.

By 2030, another goal is to reduce the total amount of waste generated per ton of net salable production by 20% compared to 2020. In 2022, the company reduced the waste generated per ton of net salable production by 1.1%, from 181 kg/t (baseline 2020) to 179 kg/t. However, the 2022 performance increased by 10% compared to 2021 (163 kg/t).

This performance is heavily influenced by the extraordinary and unforeseeable waste generated in Blendecques due to the reconstruction of the new sheeting department and warehouse, after the fire that occurred in March 2022.

Nearly all the waste generated by RDM Group - 99.3% - is non-hazardous. This waste mainly comprises rejects from the cleaning process that the paper for recycling undergoes before being con-

verted into cartonboard. It primarily consists of plastics, glass, sand and metals. RDM Group uses state-of-the-art technologies to eliminate all these non-fibrous impurities from the raw material mix.

Moreover, by optimizing this cleaning process through washing machines, the Group is able to recover usable fiber from the internal waste stream and therefore reduce the number of fibers in the pulper waste from approximately 20% to 5% of the total volume. In addition to the recovery of fibers, other benefits include the optimization of raw materials and the reduction of waste. The Group is committed to extending the use of this technology to all of the mills to achieve the 2030 targets.

Being part of a sustainable and circular system means constantly striving to establish virtuous relationships with other actors in the communities where the company operates who can make use of the waste as raw material in their own production processes. This strategy can be beneficial both for the environment and the economy, by reducing waste that goes to landfills and boosting the circular economy. Positive examples of industrial symbioses have been established with the construction (i.e., reuse fly-ashes for road and building applications) and agricultural sectors (i.e., used as fertilizer or soil amendment).

In addition, the waste-to-energy plant in Eska Hoogezand, Netherlands, has enabled the diversion of 11,786 tons of waste from third-party managed landfills or other types of disposal destinations. This waste stream becomes refuse-derived fuel that is directly used in the in-house plant to generate steam.



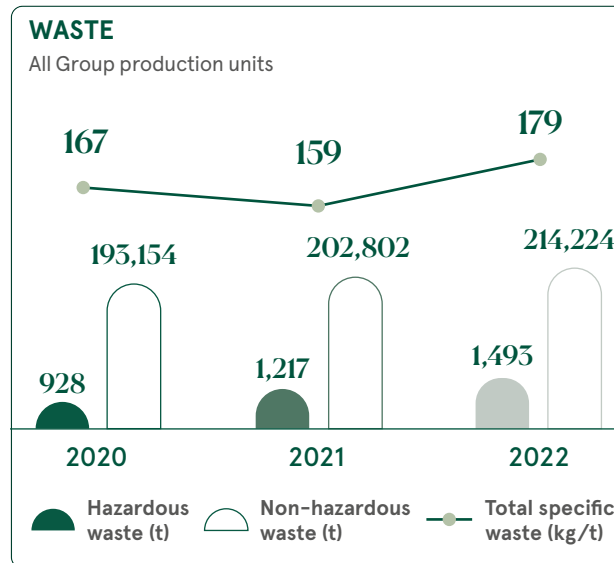
This solution represents a best practice in waste management for the pulp and paper industry, which demonstrates dedication to sustainability and environmental responsibility.

WASTE MANAGEMENT

RDM Group has an integrated quality, environment and safety policy that, in addition to underlining management’s commitment to continuous improvement, constitutes the master framework from which all of the Group’s procedures, guidelines and operating instructions on these topics are derived.

The Group’s procedures and quality standards require numerous controls on incoming raw materials, thus preventing possible unwanted materials from entering the production cycle.

By carefully selecting raw materials during the acceptance phase, the Group is able to limit the amount of waste in the production process from the outset. The quantity of waste generated by the board mills depends largely on the quality of the incoming raw materials, which in turn is the result of an efficient paper and paperboard collection system. Therefore, RDM Group, alongside national consortia for the recovery and recycling of fiber-based packaging, promotes the development and improvement of separate collection.



RDM Group makes sure that all of the waste generated within the facilities is safely handled and processed in accordance with applicable regulations and best practices, including proper labeling, storage and transport to prevent any potential harm to human health or the environment. The Group works with reliable and authorized operators who have the necessary licenses and permits to handle and properly dispose of waste.

Proper waste management practices also help reducing water and soil pollution. By facilitating the recovery and reuse of waste, RDM Group promotes the preservation of natural resources and prevents the release of potentially harmful substances into the environment.



ISO 14001 ENVIRONMENTAL CERTIFICATION

RDM Group’s mills implement environmental management systems that include rigorous waste management procedures to ensure compliance with applicable regulations. Seven mills and the headquarters have already adopted a certified management system in accordance with the ISO 14001 standard.

Additionally, two mills have voluntarily adopted EMAS, a program developed by the European Commission that enables companies to evaluate and enhance their environmental performance.

These standards establish a structured approach to waste management by setting objectives and targets for waste reduction, implementing waste prevention measures, and ensuring compliance with legal and regulatory requirements related to waste management. Implementing an environmental management system based on these standards underlines the Group’s commitment to reducing waste and protecting the environment.

People

Workforce

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Safety

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People development and diversity

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3

mills have joined the Behavior-Based Safety program as part of the long-term sustainability goals.



€770k

invested in technical and vocational training and skill development to promote continuous learning and personal growth.



2,183

people have found employment opportunities with us. The Group adopts, whenever possible, national collective bargaining agreements that guarantee good working conditions.

Workforce

RDM Group values the skills and uniqueness of its people and is committed to creating an environment where every individual can express their full potential.

WORKFORCE IN NUMBERS



2,183
people working at RDM Group



46
executives, of whom 12 are women



608
white-collar employees, of whom 182 are women



1,376
blue collar employees, of whom 24 are women



153
interim workers, of whom 9 are women



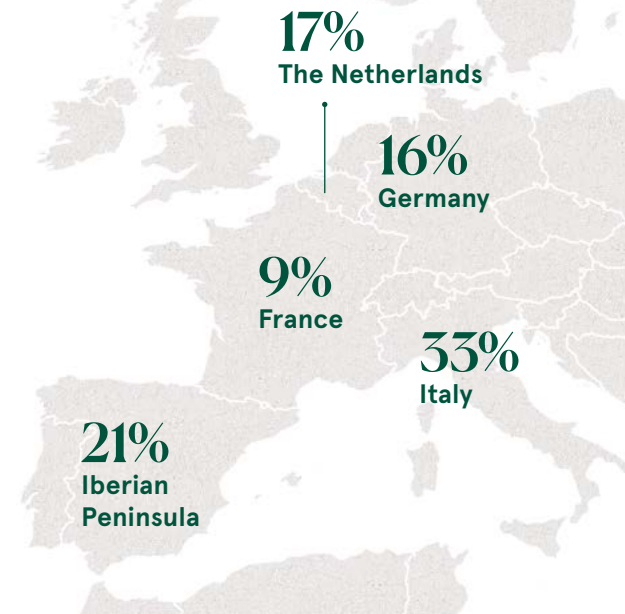
11% Total recruitment rate **10%** Total termination rate

By recognizing and leveraging the unique strengths and capabilities of each employee, the company can enhance its ability to innovate, adapt and compete in a rapidly changing business environment.

EMPLOYEES BY COUNTRY

2%
Rest of Europe

2%
Rest of the world



RDM Group employs approximately 2,200 employees and interim workers in Europe, North America and Asia. The company believes in engaging and empowering its employees and recognizes the importance of their involvement in ensuring that business operations are conducted ethically and with adherence to legal and safety guidelines. The company has measures in place that ensure the organization operates lawfully and ethically, and it is determined to promote a positive work environment in which employees feel safe and valued.

HEALTH AND WELL-BEING

RDM Group always seeks to promote the health and well-being of its employees. This is done through programs such as the healthcare monitoring program, healthcare insurance program, flu vaccination campaign and remote working policy for employees not directly connected to business operations as well as flexible hours when they don't impact the production process. In particular, the ambition of the Group is to ensure that the workforce is fit to perform its tasks by improving safety conditions and promoting healthcare services. The Group is committed to continuing to strengthen its organizational well-being program for the benefit of all RDM Group employees.

EMPLOYEE ENGAGEMENT

RDM Group believes that involving its employees in the Group's long- and short-term activities and goals helps to foster a strong sense of belonging. The Group uses the periodic "MeetUp" newsletter to reach all the Group's employees. The newsletter is written in six languages and distributed either digi-

tally or in printed format. It is important that all workers at mills are informed about the activities and initiatives promoted within the Group in their own language. Employees are also constantly updated through the intranet portal, information monitors and bulletin boards. This type of communication was increased in 2022 to ensure a more frequent circulation of news throughout the entire Group. To measure the health of the organization, RDM Group performs an extended employee survey every two years. The 2022 survey highlighted an overall increase in the participation rate from 42% to 58%, which is a positive sign for employee engagement. Overall, the employee engagement rate increased by over 7% in two years. According to the survey's definition, engaged employees are enthusiastic about their work and workplace and are willing to do their best to contribute to business success.

One of the key elements that defines the level of engagement is the advocacy rate. Increasing the employee advocacy rate is one of RDM Group's eight long-term sustainability goals. The advocacy rate measures an employee's willingness to recommend working at RDM Group to a friend or acquaintance. This indicator increased from 3.98 to 4.16 in two years (+5%). The goal is to reach 4.5 by 2030.

Overall, all fundamental factors that contribute to the engagement index have increased their score compared to the 2020 survey. Nevertheless, the company is working to further improve all areas of potential development. The results of the employee survey are embedded into the Group's change management plan that includes a wide range of initiatives that are monitored by a dedicated working group.

Safety

Health, safety and well-being are of the highest priority at RDM Group. Valuing people and promoting their personal growth are key to creating a sustainable organization. With a “Zero Accident” vision, the Group will continue to pursue a safer and thus happier workplace.

Prioritizing safety in the workplace not only helps to prevent accidents and injuries but also fosters a positive sense of belonging and commitment to the organization. This, in turn, can enhance employee satisfaction, reduce absenteeism and turnover rates and increase overall productivity.

SAFETY GOVERNANCE

In 2022, RDM Group reinforced the organization by dedicating a full-time managerial position, Group H&S Manager, that aims to improve the integration of safety across all sites, strengthen the Group’s safety standards and ensure all employees and in-

terim workers are fully committed to maintaining safe working conditions. This is an important step towards further enhancing the organization’s safety governance structure.

This safety governance structure involves both corporate management and the operational functions of the mills and is designed to facilitate coordination between mills both vertically and horizontally. The horizontal exchange promotes constructive peer analysis, allowing them to learn from each other’s successes and challenges, and can help identify actions for improvement to reduce risks and strengthen safety measures at all sites. The vertical coordination, on the other hand, aims to guarantee that all levels of the organization uphold a strong safety culture.

Involving all levels of the organization is another way to create a culture of safety and effectively monitor safety risks across all sites.



SAFETY PROGRAMS

RDM Group continued three safety programs in 2022. These programs help to enhance safety governance and promote a culture of safety across all sites.

5S PROGRAM

The “5S program” is connected to the Group’s Operational Excellence Manufacturing Program which is being gradually implemented across the whole organization. The ambition is to improve the efficiency and organization of our mills with clear benefits for the overall workplace and safety.

CROSS-MILL AUDIT PROGRAM

The “Cross-mill audit program” involves all safety managers who regularly visit other sites to identify potential hazards and areas where improvements can be made to enhance safety. This program promotes constructive peer analysis and helps each safety mana-

ger to identify operational and organizational best practices to be implemented in their own plant. By sharing best practices and reviewing safety protocols and procedures, RDM Group can continuously improve safety practices and reduce risks across all sites.

H&S INSPECTION PROGRAM

The “H&S inspection program” directly involves mill managers, safety managers, and supervisors in safety inspections on the shop floor, with a defined rotation mechanism. By involving all levels of the organization in safety inspections, RDM Group aims to strengthen “visible leadership,” an essential component of a successful health and safety culture.



SAFETY MANAGEMENT SYSTEM

RDM Group has an Integrated Quality, Environment and Safety Policy, that reaffirms management's commitment to continuous improvement. The safety management systems adopted by RDM Group are organized according to the principles outlined by the ISO 45001 standard. This standard provides a framework for managing occupational health and safety, helping organizations to identify and control risks and improve overall safety performance.

RDM Group's goal is to achieve 100% ISO 45001 certified mills by the end of 2023 as having coordinated management systems will effectively enhance the company's safety culture. The certification of RDM Paprinsa mill in Spain in early 2023 is an additional important step towards achieving this goal.

SAFETY CULTURE

RDM Group knows how important a strong safety culture is in promoting safe behavior. The Group supports and promotes supports and promotes widespread accountability and the embedding of an accident prevention culture at all levels. This encourages collaboration between workers and management to safeguard the safety and well-being of all.

A new Health, Safety and Wellbeing Roadmap has been defined to promote common safety standards and a robust health and safety culture across all RDM Group sites. The ultimate goal is to prevent all types of work-related injury or illness.

As part of the roadmap, each mill identifies the specific hazards workers are exposed to and provides them with adequate health and safety information. This is strengthened through "pre-job assessments," in which workers assess the risks associated with performing various activities and identify the necessary preventive measures. All employees are encouraged to provide suggestions for improving the health and safety system. In doing so, the Group can improve and identify new risk management and mitigation processes.

The Group has included a Behavior-Based Safety (BBS) program at all plants as part of its long-term sustainability goals. This is a milestone in the organization's safety journey, placing greater attention on safe behaviors and positive, constructive feedback. The BBS protocol requires the creation of safety checklists, specific training, engagement of the local safety team and, most importantly, peer-to-peer safety observations, which are the core of this methodology.

BBS PROTOCOL IN RDM BARCELONA

Following the successful implementation of the protocol at the mills of Santa Giustina and Villa Santa Lucia (Italy), the program is being implemented at the Barcelona Mill (Spain). In 2023, other plants will start their BBS implementation to meet the publicly declared goal.

SAFETY EDUCATION AND TRAINING

One of the pillars of the H&S system is education and training. Prior to any work activity, each employee must undergo appropriate safety training, both general and job-specific, which is periodically updated as required by law.

Regular and up-to-date training ensures employees are aware of the potential hazards associated with their work and have the knowledge and skills necessary to identify and mitigate those hazards.

External contractors must demonstrate that they have completed relevant safety training before working with RDM Group. The company takes the safety of external contractors seriously, and all those involved must comply with the rules and procedures laid out by RDM Group.

Providing on-the-job training and coaching by senior employees is an effective way to help junior employees learn and develop safe work practices.



SAFETY RESULTS

There were positive and negative trends in terms of workplace safety in 2022. Three sites out of thirteen had a zero-accident year. This shows that it is possible to maintain a high level of safety performance even in challenging circumstances. The overall safety results for the Group showed a slight increase in the frequency rate and a more significant deterioration of the severity rate compared to the previous year. Every accident goes through a complete root-cause analysis to prevent similar accidents from happening at any RDM Group location.

The company knows that safety requires a shift in company culture and the adoption of new tools, which is a long process that can experience setbacks. The ultimate goal is to see a permanent reduction of accidents over the long term. RDM Group also monitors the injury rates of its key external contractors, who are primarily engaged in internal logistics activities. There was only one minor Lost-time-Accident with three lost days for this category of worker. If this additional category of worker is included, the frequency rate would still be 2.3, whereas the severity rate would slightly decrease to 87.1.

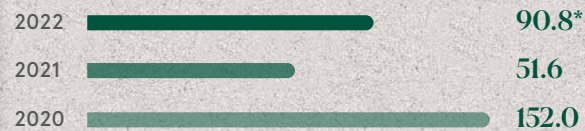
According to an analysis of injuries in 2022, 64% were related to human and behavioral factors, 22% to technical factors and 14% to organizational factors. The analysis suggests that addressing these factors can have a significant impact on reducing the incidence of injuries in the workplace. This was the impetus for the Group to introduce the behavioral safety protocol at all mills.

FREQUENCY AND SEVERITY OF INJURIES

FREQUENCY RATE (FR)



SEVERITY RATE (SR)

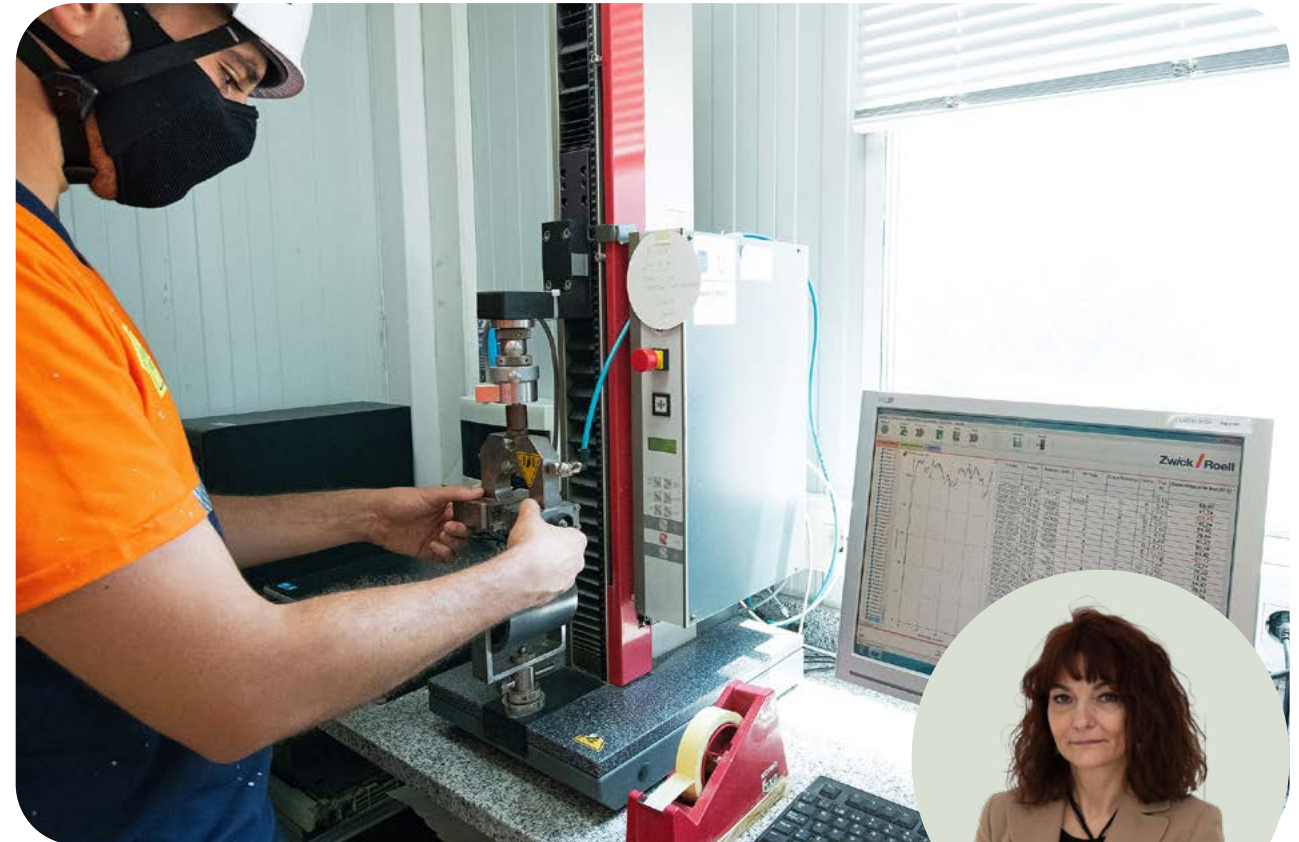


* 14.0 related to restricted activities

FR = number total OSHA recordable cases × 200,000 / hours worked
 SR = total days lost × 200,000 / hours worked
 OSHA methodology applied to employees and interim workers. The 2021 and 2020 figures have been restated to include only operational plants in order to follow a homogeneous risk approach.

SAFETY AWARD

Each year, all individuals who have been injury-free for the past 10, 20, 30 and 40 years on the job receive a special award as recognition for their commitment to their own and their coworkers' safety.



Marita Lovera

Chief Human Resources Officer

“Providing a safe and healthy working environment is not only a legal obligation, but also a commitment toward the company’s workers. It is a critical responsibility that RDM Group takes seriously to ensure the well-being of all workers and the success of the business.”

People Development and Diversity

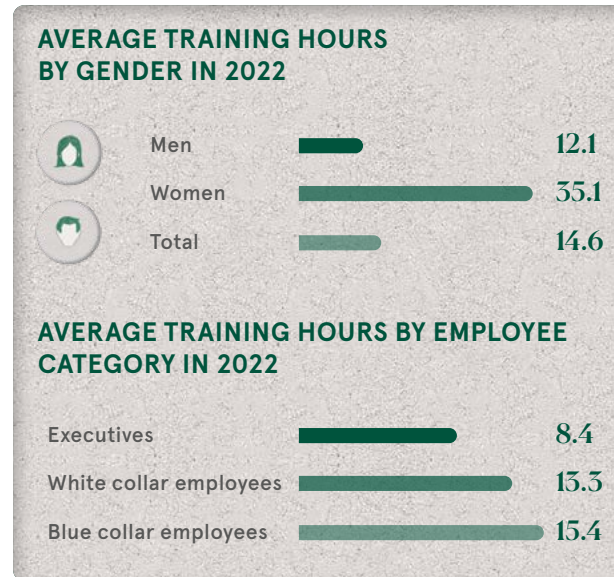
Human resources are a crucial part of RDM Group. It is not possible to create lasting value without the qualified work of the personnel in its plants and offices.

It is in the interest and commitment of the entire Group to create and maintain the necessary conditions to further enhance the skills and knowledge of each employee.

The company uses mentoring and development plans to transfer skills and know-how from senior to junior employees, so that the company's skills and values are passed on and remain within the Group. RDM Group also provides specific programs for the acquisition of new skills to ensure the strategic development of the Group, as well as enhance the potential of individuals.

Through training plans and the verification of their effectiveness the Group maps employee skills and devise targeted training investments. In turn, the training plans benefit from the input of the performance appraisal system, which allows employees to highlight any training needs and desired areas of professional development.

In 2022, the company continued to invest in training using both digital platforms and in-person sessions. Compared to 2021, the average number of training hours per person increased from 9.4 to 14.6.



LEADERSHIP

In 2022, the Group continued to invest in the Leadership Training program. The program includes individual coaching for people assuming new positions and management roles to address specific leadership challenges and provide personalized guidance and feedback to help improve their performance. Specific leadership training was also organized for larger groups of middle-managers to enhance communication and collaboration, decision-making and organizational performance, as well as specific strategic training.

DIGITAL MINDSET

Following the digital skills assessment carried out last year, the Group implemented a significant Digital Training program in 2022. The program aimed to improve digital literacy, highlighting the areas of improvement for topics concerning both the working environment and the personal area. All employees were then given the possibility to improve their skills and further develop their knowledge of digital culture.

One of the most important training programs planned for 2023 regards cybersecurity. The Group's goal is to educate users on best practices and techniques to prevent and mitigate cyber threats such as viruses, hacker attacks, data theft, phishing and more. This initiative is part of a wider digitalization program that will provide all users with more effective and sophisticated tools and applications. These tools and applications will also involve the area of human resources and its employee management programs.

ETHICS

After the release of the updated Code of Ethics, RDM Group organized a Group-wide training session in 2022 to ensure that everyone in the organization understands and is familiar with the principles outlined in the code.

CULTURAL FACILITATION

The Group has also continued its language training programs, which includes one-on-one classes within personalized programs to facilitate communication among colleagues of different nationalities.

SCHOLARSHIPS

RDM Group believes that investing in the education and development of young talents is crucial to the long-term success of the company and the industry as a whole. The Group offers scholarships for specific paper industry-based education to support students who are interested in pursuing careers in this field.

PERFORMANCE MANAGEMENT

To promote a dynamic and meritocratic work environment, RDM Group has adopted a performance incentive system in which bonuses are given according to the achievement of personal goals and measurable company objectives (MBO).

The performance incentive system also includes long-term incentive schemes for RDM Group's top management, extended over a period of multiple years, to support the long-term development of RDM Group. The performance appraisal system is based on formal mechanisms that extend to second-level management. In 2023, the Group is planning to extend the appraisal system to a wider range of employees as it is already implemented in some

locations. At RDM Group, remuneration schemes are consistent with long-term sustainability goals. Since 2022, three of these goals (i.e., those that are the binding KPIs of the “Sustainability-Linked Bond” issued to finance the company) have been linked to the variable remuneration of RDM Group’s management. Effectively implementing the sustainability strategy is considered in performance evaluation and bonus schemes, including for the CEO and other top managers.

This connection between bonus schemes and sustainability performance aligns with long-term improvement of the environmental performance of the entire Group.

DIVERSITY AND EQUAL OPPORTUNITIES

At RDM Group, fairness and respect are not just buzzwords but fundamental values that are deeply rooted in the company. The Group prioritizes the dignity and rights of employees, providing stable employment opportunities and fair working conditions. RDM Group is committed to promoting equal opportunities and non-discrimination in all aspects of operations, including hiring, development and employee management. The Group recognizes that personal characteristics such as nationality, gender, age, religion, and other factors should never be used as a basis for discrimination.

RDM Group is present in several European countries, as well as the United States and Hong Kong, where there are production units and sales offices, therefore, the company operates in places with different languages, traditions and socio-cultural norms. With regards to gender-balance, the cartonboard industry is generally characterized by a workforce

that is predominantly male, considering the physical demands of the job. Nevertheless, RDM Group’s HR team is working towards a more inclusive workforce, and as part of the 2020 - 2030 Sustainability Plan, the Group set the long-term goal to increase the percentage of women by 30%. The company has 2,030 direct employees, 10.7% of whom are women and 89.3% men. Since 2020, the number of women in the Group has increased by 13%, starting from a 9.5% baseline.

The Group is committed to promoting fairness, transparency and expertise in the recruitment and selection of personnel. The Group recognizes the value of drawing on an international talent pool to bring diverse perspectives and ideas to the organization. In order to ensure objectivity and impartiality in the selection process, the company assesses candidates based on their skills, experience and potential.

RDM Group strives for a transparent dialogue with the trade union representatives and adopts, where applicable, national collective bargaining agreements. For employees who are not covered by collective bargaining agreements, individual agreements or local bargaining agreements are applied.

RDM Group is present in countries known to be at low risk of human rights violations, which allows us to operate within the framework of the United Nations Universal Declaration of Human Rights and the fundamental International Labor Organization Conventions. In 2022, no cases of discrimination or harm to personal dignity and rights involving RDM Group’s employees or interim workers were brought to the company’s attention.



Appendix

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About this report

COMPLIANCE AND METHODOLOGY

RDM Group’s Sustainability Report 2022 is designed to inform its stakeholders of its current performance and future perspectives with regards to sustainability.

The contents of this document have been identified based on results from the updated materiality analysis, which aimed to identify the topics of greatest importance and their impact, in terms of long-term growth and value creation for all stakeholders. The Sustainability Report refers to the period between January 1 and December 31, 2022 and has been prepared in accordance with the GRI Standards 2021, published by the Global Reporting Initiative. Sustainability Reports are published annually. Consistently with the principles set out by the reporting standard, this Sustainability Report has been prepared to offer a balanced, accurate, exhaustive and transparent representation of the results achieved, considering the expectations of stakeholders involved and the impacts generated by the Group’s activities.

The “GRI Content Index” section has been included in the Appendix to highlight the GRI disclosures and the corresponding pages of reference for each material topic for the Group. The Appendix also contains the “Sustainability Performance” section, which includes all data in table format to facilitate the reader’s search and analysis of key figures. Where possible, the information contained in the Sustainability Report has been compared to previous years, to allow the reader to have a better un-

derstanding of the Group’s progress. In order to ensure the reliability of data and a correct representation of performance, the use of estimates has been limited as much as possible and, where present, these are based on the best available methodologies.

In this report, metric tons are used as the unit of measure for weights. Who provide core business-related services to the company and have a stable on-site presence. The term “highest governance body” reported in the GRI content index refers to the Board of Directors.

Where reported, the reference to FSC® is made in accordance with license code n. FSC-C081817.

REPORTING BOUNDARY

The scope of the economic data is the same as in the Group’s 2022 Consolidated Financial Statements; all other data and information includes the Parent Company and the companies consolidated on a line-by-line basis in the Consolidated Financial Statements.

However, environmental and safety KPIs do not include data relating to offices, as they are considered to be non-material.

The 2021 sustainability performance data has been updated and reflects the integration of two new entities (Paprinisa and Eska) which were included within the reporting boundary six months after the acquisition in July 2021. Furthermore, data for the mill in La Rochette, France is included until its divestment in April 2021.

The reporting boundary of the “Sustainability Long-

Term Goals 2020-2030” reported on page 10 does not include the mill of La Rochette, which was already part of a sales agreement when the goals were launched.

Any further exceptions to the scope of consolidation are clearly explained throughout the Sustainability Report, if any. The restatements of comparative data published in previous Reports are clearly indicated as such.

REPORTING APPROVAL AND ASSURANCE

The Sustainability Report was approved by the Board of Directors on April 12, 2023. The entity appointed to perform the third-party independent assurance of this Sustainability Report is PricewaterhouseCoopers Business Services S.r.l. which provides, in a separate report, an attestation regarding compliance of the information provided with GRI Standards. The appointment of a third-party independent auditor for the sustainability report has been decided by the company’s management to provide quality data to stakeholders and improve the accuracy and reliability of the disclosed information.

For more information or comments on this report please contact the Group at: sustainability@rdmgroup.com



Sustainability Performance

PRODUCTION	U.o.M.	2022	2021	2020
Gross production	ton	1,403,870	1,470,794	1,348,311
Net salable production	ton	1,206,493	1,281,125	1,159,913

RAW MATERIALS AND OTHER MATERIALS	U.o.M.	2022	2021	2020
Total raw materials and other materials used	kton	1,524	1,686	1,508
of which renewables	kton	1,296	1,421	1,265
of which non-renewables	kton	228	264	243
Total fiber-based raw materials	kton	1,252	1,367	1,223
Paper for recycling	kton	1,190	1,229	951
Market virgin pulp	kton	62	74	101
of which certified FSC®/PEFC or FSC® controlled wood	%	100	100	100
Wood chips	kton	0	64	171
of which certified FSC®/PEFC or FSC® controlled wood	%	11	55	58

ENERGY	U.o.M.	2022	2021	2020
Total energy consumption ⁽¹⁾	MWh	2,575,371	2,873,875	2,772,083
Energy consumption from fossil fuels	MWh	2,370,386	2,441,542	2,133,084
of which natural gas	MWh	1,930,087	1,983,754	1,680,952
of which diesel	MWh	10,517	11,410	8,285
of which LPG/propane	MWh	284	721	642
of which Waste to Energy (fossil)	MWh	29,372	14,575	0
of which coal	MWh	399,992	423,904	425,855
of which fuel oil	MWh	134	7,177	17,350
Energy consumption from renewable sources	MWh	28,186	134,111	296,340
of which biomass	MWh	0	116,708	296,340
of which biogas	MWh	4,412	2,850	0
of which Waste to Energy (biogenic)	MWh	23,774	14,553	0
Electricity purchased	MWh	176,798	298,222	353,568
of which electricity from renewable certified sources	MWh	48,704	60,626	24,005

Electricity sold	MWh	205,246	367,232	356,667
Energy intensity ⁽²⁾	MWh/t	2.13	2.24	2.39

⁽¹⁾ Does not include fossil fuel used for the generation of electricity supplied to the national grids amounting to 431,065 MWh (2022), 708,756 MWh (2021) and 660,439 MWh (2020).

⁽²⁾ Energy intensity is calculated with net salable production.

GHG EMISSIONS	U.o.M.	2022	2021	2020
Direct emissions (Scope 1) ⁽¹⁾	tCO ₂ e	492,342	508,983	450,805
Indirect emissions (Scope 2) (location-based) ⁽²⁾	tCO ₂ e	40,588	65,611	64,757
Indirect emissions (Scope 2) (market-based) ⁽²⁾⁽³⁾	tCO ₂ e	51,806	60,938	70,957
Emissions neutralized with green certificates (market-based)	tCO ₂ e	15,342	27,827	11,186
Emissions from biogenic sources	tCO ₂ e	7,410	52,824	119,425
Emission intensity (location-based)	tCO ₂ e/t	0.442	0.449	0.444
Emission intensity (market-based)	tCO ₂ e/t	0.451	0.445	0.450

⁽¹⁾ Gases included in the calculation: CO₂, CH₄, N₂O, HFC. 2022 emission factor sources: EU Guidance Document Biomass issues in the EU-ETS; UK 2022 Government GHG conversion factors for company reporting; AIB 2021 Residual mix results v 1.0; latest version of Terna - confronti internazionali (2019).

⁽²⁾ Indirect emissions are expressed in metric tons of CO₂; the percentage of methane and nitrous oxide has a negligible effect on total greenhouse gas emissions (CO₂e) as per technical literature. Emissions from corporate fleets are excluded as they are not material. Emissions from fossil fuel combustion for the generation of electricity supplied to the national grids are excluded and correspond to 79,166 tCO₂e (2022), 79,427 tCO₂e (2021) and 121,435 tCO₂e (2020).

⁽³⁾ Indirect scope 2 market-based emissions are net of the emissions neutralized through green electricity, amounting to 15,342 tCO₂e.

OTHER EMISSIONS	U.o.M.	2022	2021	2020
NO _x	ton	308	511	439
SO _x	ton	134	138	140
Particles	ton	5	11	23
Carbon monoxide	ton	182	285	211
Volatile organic compounds (VOC)	ton	35.1	24.8	3.4

The figures in the table refer to the sole activity of cartonboard production. Total 2022 amount, including the emissions related to the electricity produced and supplied to the grid, are: NO_x 335 tons, SO_x 135 tons, particles 5 tons, carbon monoxide 196 tons, VOC 35.4 tons.

WATER	U.o.M.	2022	2021	2020
Water withdrawals⁽¹⁾	megaliters	17,038	17,676	18,628
of which from surface waters	megaliters	8,380	8,817	10,137
of which from groundwater	megaliters	8,394	8,605	8,271
of which from municipal water supply	megaliters	264	254	220
Water discharges	megaliters	11,174	13,475	13,885
of which to external treatment plants	megaliters	4,473	4,978	4,483
of which towards surface waters	megaliters	6,701	8,497	9,402
Non-contact cooling water discharges⁽²⁾	megaliters	3,687	2,577	3,135
Water withdrawal intensity⁽³⁾	m³/t	14.12	13.80	16.06
Water discharge intensity⁽³⁾	m³/t	9.26	10.52	11.97

⁽¹⁾ Water withdrawals include cooling water.

⁽²⁾ Non-contact cooling water discharges consist of cooling water that is kept physically separated from process water before final discharge.

⁽³⁾ Water withdrawal intensity and wastewater discharge intensity are calculated per ton of net salable production.

WATER STRESS	U.o.M.	2022	2021	2020
Withdrawals from low water stress areas	megaliters	2,100	2,326	4,275
of which from surface waters	megaliters	0	0	3,678
of which from groundwater	megaliters	1,962	2,186	579
of which from municipal water supply	megaliters	138	140	18
Withdrawals from moderate water stress areas	megaliters	10,644	10,659	12,226
of which from surface waters	megaliters	6,764	6,566	4,351
of which from groundwater	megaliters	3,789	4,014	7,691
of which from municipal water supply	megaliters	91	79	183
Withdrawals from high water stress areas	megaliters	4,294	4,690	2,126
of which from surface waters	megaliters	1,616	2,250	2,107
of which from groundwater	megaliters	2,643	2,405	0
of which from municipal water supply	megaliters	35	35	19
Water discharges to low water stress areas	megaliters	1,994	2,204	976
Water discharges to moderate water stress areas	megaliters	5,631	7,240	10,859
Water discharges to high water stress areas	megaliters	3,549	4,031	2,049

EMISSION TO WATER	U.o.M.	2022	2021	2020
Chemical Oxygen Demand (COD)	ton	612	710	1,263
Total suspended solids (TSS)	ton	96	98	191
Nitrogen	ton	13	20	22
Phosphorus	ton	1	2	4

The figures include all the Group's production units with an internal wastewater treatment plant that discharges directly toward water bodies. Therefore, mills that discharge wastewater, totally or partially, to external treatment plants are excluded.

WASTE	U.o.M.	2022	2021	2020
Total waste generated	ton	215,717	204,019	194,082
Total non-hazardous waste	ton	214,224	202,802	193,154
Total hazardous waste	ton	1,493	1,217	928
Total sent for disposal	ton	68,344	62,404	52,154
Total sent for recovery	ton	147,373	141,615	141,927
Total Specific Waste ⁽¹⁾	kg/t	179	159	167

⁽¹⁾ Total specific waste calculated with net salable production.

SAFETY (EMPLOYEES)	U.o.M.	2022	2021	2020
Fatalities	n.	0	0	0
Total injuries	n.	30	29	47
Total high-consequences injuries	n.	1	0	3
Total lost days	n.	1,191	742	1,990
Total worked hours	n.	2,750,906	2,651,854	2,510,826
Frequency rate	Ratio	2.2	2.2	3.7
Severity rate	Ratio	86.6	56.0	158.5
Fatality rate	Ratio	0.0	0.0	0.0
Rate of high-consequences injuries	Ratio	0.1	0.0	0.2

The 2021 and 2020 figures have been restated to include only operational plants in order to follow a homogeneous risk approach.

SAFETY (INTERIM WORKERS)	U.o.M.	2022	2021	2020
Fatalities	n.	0	0	0
Total injuries	n.	6	3	4
Total high-consequences injuries	n.	1	0	0

Total lost days	n.	230	21	53
Total worked hours	n.	378,945	304,068	177,935
Frequency rate	Ratio	3.2	2.0	4.5
Severity rate	Ratio	121.4	13.8	59.6
Fatality rate	Ratio	0.0	0.0	0.0
Rate of high-consequences injuries	Ratio	0.5	0.0	0.0

The 2021 and 2020 figures have been restated to include only operational plants in order to follow a homogeneous risk approach.

SAFETY (MAIN EXTERNAL CONTRACTORS)	U.o.M.	2022	2021	2020
Fatalities	n.	0	0	0
Total injuries	n.	1	0	0
Total high-consequences injuries	n.	0	0	0
Total lost days	n.	3	0	0
Total worked hours	n.	138,791	169,877	162,845
Frequency rate	Ratio	1.4	0.0	0.0
Severity rate	Ratio	4.3	0.0	0.0
Fatality rate	Ratio	0.0	0.0	0.0
Rate of high-consequences injuries	Ratio	0.0	0.0	0.0

SAFETY (EMPLOYEES AND INTERIM WORKERS)	U.o.M.	2022	2021	2020
Frequency rate	Ratio	2.3	2.2	3.8
Severity rate	Ratio	90.8	51.6	152.0
Fatality rate	Ratio	0.0	0.0	0.0
Rate of high-consequences injuries	Ratio	0.1	0.0	0.2

The 2021 and 2020 figures have been restated to include only operational plants in order to follow a homogeneous risk approach.

WORKFORCE (headcount)	U.o.M.	2022	2021	2020
Number of employees	n.	2,030	2,006	1,729
of which men	n.	1,812	1,797	1,565
of which women	n.	218	209	164
of which executives	n.	46	44	40

of which white-collar employees	n.	608	561	443
of which blue-collar employees	n.	1,376	1,401	1,246
of which permanent employees	n.	1,959	1,910	1,673
of which temporary employees	n.	71	96	56
of which full-time employees	n.	1,965	1,945	1,699
of which part-time employees	n.	65	61	30
of which in Italy	n.	673	678	652
of which in France	n.	189	207	499
of which in the Iberian Peninsula	n.	423	404	239
of which in Germany	n.	329	318	320
of which in the Netherlands	n.	346	332	0
of which in the rest of Europe	n.	27	26	19
of which in the rest of the World	n.	43	41	0
of which covered by national collective bargaining agreement	%	92.6	91.7	97.3
Number of interim workers	n.	153	240	102

2022 employees: full-time men 90% and 10% women; part-time men 60% and women 40%; permanent men 90% and 10% women; fixed-term men 77% and women 23%; full-time employees Italy 99%, Iberian Peninsula 96%, the Netherlands 93%, Germany 95%, France 99%, Rest of Europe 100%, Rest of the World 98%; part-time employees Italy 1%, Iberian Peninsula 4%, the Netherlands 7%, Germany 5%, France 1%, Rest of Europe 0%, Rest of the World 2%; permanent employees Italy 99%, Iberian Peninsula 99%, the Netherlands 95%, Germany 88%, France 96%, Rest of Europe 100% Rest of the World 100%; fixed-term employees Italy 1%, Iberian Peninsula 1%, the Netherlands 5%, Germany 12%, France 4%, Rest of Europe 0%, Rest of the World 0%.

EMPLOYEES HIRED AND DISMISSED	U.o.M.	2022	2021	2020
Total employees hired	n.	222	175	87
of which men	n.	177	137	71
of which women	n.	45	38	16
of which < 30 years old	n.	71	67	45
of which 30 - 50 years old	n.	121	99	32
of which > 50 years old	n.	30	9	10
of which in Italy	n.	74	66	27
of which in France	n.	15	24	36
of which in the Iberian Peninsula	n.	40	36	5
of which in Germany	n.	33	19	14
of which in the Netherlands	n.	30	10	0

of which in the rest of Europe	n.	10	15	5
of which in the rest of the World	n.	20	5	0
Total employees dismissed	n.	199	126	124
of which men	n.	169	99	109
of which women	n.	30	27	15
of which < 30 years old	n.	37	18	7
of which 30 - 50 years old	n.	71	49	42
of which > 50 years old	n.	91	59	75
of which in Italy	n.	75	45	46
of which in France	n.	31	14	34
of which in the Iberian Peninsula	n.	29	15	19
of which in Germany	n.	22	21	21
of which in the Netherlands	n.	18	20	0
of which in the rest of Europe	n.	6	8	4
of which in the rest of the World	n.	18	3	0

EMPLOYEES RECRUITMENT RATE	U.o.M.	2022	2021	2020
Total recruitment rate	%	11	9	5
Recruitment rate men	%	10	8	5
Recruitment rate women	%	21	18	10
Recruitment rate < 30 years old	%	35	33	29
Recruitment rate 30 - 50 years old	%	13	11	4
Recruitment rate > 50 years old	%	3	1	1
Recruitment rate in Italy	%	11	10	4
Recruitment rate in France	%	8	12	7
Recruitment rate in the Iberian Peninsula	%	9	9	2
Recruitment rate in Germany	%	10	6	4
Recruitment rate in the Netherlands	%	9	3	0
Recruitment rate in the rest of Europe	%	37	58	26
Recruitment rate in the rest of the World	%	47	12	0

Rate calculated as the number of recruitments within each age, geographical area or gender group.

EMPLOYEES TERMINATION RATE	U.o.M.	2022	2021	2020
Total termination rate	%	10	6	7
Termination rate men	%	9	6	7
Termination rate women	%	14	13	9
Termination rate < 30 years old	%	18	9	4
Termination rate 30 - 50 years old	%	8	6	5
Termination rate > 50 years old	%	10	6	11
Termination rate in Italy	%	11	7	7
Termination rate in France	%	16	7	7
Termination rate in the Iberian Peninsula	%	7	4	8
Termination rate in Germany	%	7	7	7
Termination rate in the Netherlands	%	5	6	0
Termination rate in the rest of Europe	%	22	31	21
Termination rate in the rest of the World	%	42	7	0

Rate calculated as the number of terminations and resignations within each age, geographical area or gender group.

DIVERSITY	U.o.M.	2022	2021	2020
Total number of executives	n.	46	44	40
of which men	n.	34	31	31
of which women	n.	12	13	9
of which < 30 years old	n.	0	0	0
of which 30 - 50 years old	n.	12	15	16
of which > 50 years old	n.	34	29	24
Total number of white-collar employees	n.	608	561	443
of which men	n.	426	397	318
of which women	n.	182	164	125
of which < 30 years old	n.	60	51	33
of which 30 - 50 years old	n.	269	258	206
of which > 50 years old	n.	279	252	204
Total number of blue-collar employees	n.	1,376	1,401	1,246
of which men	n.	1,352	1,369	1,216
of which women	n.	24	32	30
of which < 30 years old	n.	145	150	124

of which 30 - 50 years old	n.	633	602	652
of which > 50 years old	n.	598	649	470
Total number of Board members	n.	7	7	7
of which men	n.	5	5	4
of which women	n.	2	2	3
of which < 30 years old	n.	1	1	0
of which 30 - 50 years old	n.	3	5	2
of which > 50 years old	n.	3	1	5

Rate calculated as the number of terminations and resignations within each age group, geographical area or gender.

TRAINING	U.o.M.	2022	2021	2020
Average hours of training for employees	n.	14.6	9.4	7.3
Average training hours for men	n.	12.1	9.0	6.8
Average training hours for women	n.	35.1	13.3	11.8
Average training hours for executives	n.	8.4	10.2	12.1
Average training hours for white-collar employees	n.	13.3	14.3	8.2
Average training hours for blue-collar employees	n.	15.4	7.4	6.8
Employees trained	n.	1,597	1,093	888
of which executives	n.	29	36	32
of which white-collar employees	n.	467	361	290
of which blue-collar employees	n.	1,101	696	566

CLAIMS	U.o.M.	2022	2021	2020
Withdrawals from the market for food safety	n.	0	0	0
Recalls from the market for food safety	n.	0	0	0
Rate of complaints ⁽¹⁾	Ratio	0.26	0.27	0.35

⁽¹⁾ Number of complaints per 100 tons of net salable production.



GRI Content Index

Statement of use	RDM Group has reported in accordance with the GRI Standards for the period 1st January – 31st December 2022.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	NA

GRI STANDARD	DISCLOSURE	COMMENTS AND OMISSIONS	LOCATION
General disclosures			
GRI 2: General Disclosures 2021	2-1 Organizational details		p. 7; Credits
	2-2 Entities included in the organization’s sustainability reporting		pp. 7, 55
	2-3 Reporting period, frequency and contact point		p. 55
	2-4 Restatements of information		pp. 51, 57, 58
	2-5 External assurance		p. 55; pp. 66-69
	2-6 Activities, value chain and other business relationships		pp. 7, 8, 29, 30, 33
	2-7 Employees		pp. 6, 7, 48, 58
	2-8 Workers who are not employees		pp. 48, 55, 58
	2-9 Governance structure and composition		pp. 14, 15
	2-10 Nomination and selection of the highest governance body		p. 14
	2-11 Chair of the highest governance body		p. 14
	2-12 Role of the highest governance body in overseeing the management of impacts		pp. 14, 15
	2-13 Delegation of responsibility for managing impacts		pp. 14, 15
	2-14 Role of the highest governance body in sustainability reporting		pp. 14, 15, 20, 55
	2-15 Conflicts of interest	The Group is not aware of any case of conflicts of interest.	p. 16

General disclosures

2-16 Communication of critical concerns		p. 17
2-17 Collective knowledge of the highest governance body	No new formal induction to the Board of Directors other than the session held in 2021. Sustainable development matters are regularly presented to the Board members during each committee meeting.	
2-18 Evaluation of the performance of the highest governance body		p. 14
2-19 Remuneration policies	Omission due to confidentiality constraints.	
2-20 Process to determine remuneration		pp. 14, 15, 52, 53
2-21 Annual total compensation ratio	Omission due to confidentiality constraints.	
2-22 Statement on sustainable development strategy		p. 4
2-23 Policy commitments	Policies available at rdmgroup.com/governance/	pp. 16, 17, 23, 24
2-24 Embedding policy commitments		pp. 16, 17, 23, 24
2-25 Processes to remediate negative impacts		pp. 16, 17
2-26 Mechanisms for seeking advice and raising concerns		p. 17
2-27 Compliance with laws and regulations		p. 17
2-28 Membership associations		p. 21
2-29 Approach to stakeholder engagement		p. 18
2-30 Collective bargaining agreements		pp. 53, 58

Material topics

GRI 3: Material Topics 2021	3-1 Process to determine material topics		pp. 19, 20
	3-2 List of material topics	Compared to the previous materiality matrix, three new material topics were included: Enterprise Risk Management, Digital transformation and Cybersecurity, Diversity, inclusion and equal opportunity. The topic "Respect of human rights" was not assessed as a separate potential topic since the impact on human rights was evaluated within each material topic.	pp. 20

Financial health			
GRI 3: Material Topics 2021	3-3 Management of material topics	The impacts not explicitly reported in this Report on the material topic "financial health" refer to the ability of the company to be a reliable partner to its stakeholders, including supplier, employees, and investors.	Consolidated Financial Statements 2022 p. 12
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed		p. 6
Ethics and business integrity			
GRI 3: Material Topics 2021	3-3 Management of material topics		pp. 16, 17, 23, 24
GRI 205: Anti-corruption 2016	205-3 Confirmed incidents of corruption and actions taken		pp. 16, 17
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		pp. 16, 17
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken		pp. 17, 53
Circular economy			
GRI 3: Material Topics 2021	3-3 Management of material topics		pp. 8, 25, 27, 45
GRI 301: Materials 2016	301-1 Materials used by weight or volume		pp. 29, 56
	301-2 Recycled input materials used		pp. 29, 56
Energy and climate change			
GRI 3: Material Topics 2021	3-3 Management of material topics		pp. 9, 10, 22, 23; pp. 38-42
GRI 302: Energy 2016	302-1 Energy consumption within the organization		pp. 39, 56
	302-3 Energy intensity		pp. 6, 39, 56
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions		pp. 42, 56
	305-2 Energy indirect (Scope 2) GHG emission		pp. 42, 56
	305-4 GHG emissions intensity		pp. 42, 56
	305-7 Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions		pp. 42, 56
Water withdrawal and discharges			
GRI 3: Material Topics 2021	3-3 Management of material topics		pp. 10, 22, 43, 44

GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	pp. 43, 44
	303-2 Management of water discharge-related impacts	p. 44
	303-3 Water withdrawal	Requirement 303-3-c not available. pp. 43, 57
	303-4 Water discharge	Requirements 303-4-b not available. pp. 6, 43, 57
Responsible waste management		
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 10, 22, 45, 46
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	pp. 45, 46
	306-2 Management of significant waste-related impacts	pp. 45, 46
	306-3 Waste generated	pp. 6, 46, 57
Responsible supply chain		
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 8, 22; pp. 29-32
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	p. 32
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	p. 32
Employee management and development		
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 25, 48, 52, 53
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	pp. 48, 58, 59
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	pp. 52, 60
Employee health, safety and well-being		
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 10, 23; pp. 49-51
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	pp. 49, 50
	403-2 Hazard identification, risk assessment, and incident investigation	pp. 49, 50
	403-3 Occupational health services	p. 48
	403-4 Worker participation, consultation, and communication on occupational health and safety	p. 48, 49
	403-5 Worker training on occupational health and safety	p. 50
	403-6 Promotion of worker health	pp. 48-51
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	pp. 49-51
	403-9 Work-related injuries	pp. 51, 57, 58

Diversity, inclusion and equal opportunity

GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 10, 23, 25, 48, 53
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	pp. 48; pp. 58-60

Product quality and innovation

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 23; pp. 33-35
GRI 416: Customer Health and Safety	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	pp. 34, 60

Continuity of business operations

GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 12, 24
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Digital transformation and cybersecurity

GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 24, 25, 52
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Customer satisfaction

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 23, pp. 34-36
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Enterprise risk management

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 22
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RENO DE MEDICI SPA

**INDEPENDENT AUDITOR'S REPORT ON THE SUSTAINABILITY REPORT FOR THE YEAR ENDED
31 DECEMBER 2022**



Independent auditor's report on the Sustainability Report 2022

To the Board of Directors of Reno de Medici SpA.

We have undertaken a limited assurance engagement on Sustainability Report (the "Report") of Reno de Medici SpA and its subsidiaries (the "Group") for the year ended 31 December 2022 prepared in accordance with GRI Sustainability Reporting Standard and approved by the Board of Directors on 12 April 2023.

Responsibilities of the Directors for the Sustainability Report

The Directors are responsible for the preparation of the Report in accordance with the *Global Reporting Initiative Sustainability Reporting Standards* issued in 2016 and updated in 2021 by the *GRI – Global Reporting Initiative* (the "GRI standard"), identified by them as the *reporting standard*.

The Directors are also responsible, in the terms prescribed by law, for such internal control as they determine is necessary to enable the preparation of a Report that is free from material misstatement, whether due to fraud or error.

Moreover, the Directors are responsible for defining the sustainability performance targets of the Group, as well as for identifying the stakeholders and the significant aspects to be reported.

Finally, the Directors are responsible for defining the business and organisational model of the Group and, with reference to the matters identified and reported in the Report, for the policies adopted by the Group and for the identification and management of risks generated and/or faced by the Group.

PricewaterhouseCoopers Business Services Srl

Società a responsabilità limitata a socio unico

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Società soggetta all'attività di direzione e coordinamento della PricewaterhouseCoopers Italia Srl
www.pwc.com/it



Auditor's Independence and Quality Control

We are independent in accordance with the principles of ethics and independence set out in the Code of Ethics for Professional Accountants published by the International Ethics Standards Board for Accountants, which are based on the fundamental principles of integrity, objectivity, competence and professional diligence, confidentiality and professional behaviour. Our audit firm adopts International Standard on Quality Management 1 (ISQM 1) and, accordingly, maintains an overall quality control system which includes processes and procedures for compliance with ethical and professional principles and with applicable laws and regulations.

Auditor's responsibilities

We are responsible for expressing a conclusion, on the basis of the work performed, regarding the compliance of the Report with the requirements of the GRI Standards. We conducted our work in accordance with International Standard on Assurance Engagements 3000 (Revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information (“ISAE 3000 Revised”), issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. The standard requires that we plan and apply procedures in order to obtain limited assurance that the Report is free of material misstatement. The procedures performed in a limited assurance engagement are less in scope than those performed in a reasonable assurance engagement in accordance with ISAE 3000 Revised, and, therefore, do not provide us with a sufficient level of assurance that we have become aware of all significant facts and circumstances that might be identified in a reasonable assurance engagement.

The procedures performed on the Sustainability Report were based on our professional judgement and consisted in interviews, primarily of company personnel responsible for the preparation of the information presented in the Report, analyses of documents, recalculations and other procedures designed to obtain evidence considered useful.

In detail, we performed the following procedures:

1. analysis of the process aimed at defining the significant reporting areas to be disclosed in the Sustainability Report, with regard to the methods for their identification, in terms of priority for the various stakeholders, as well as the internal validation of the process findings;
2. understanding of the processes underlying the preparation, collection and management of the significant qualitative and quantitative information included in the Report.

In detail, we held meetings and interviews with the management of Reno de Medici SpA and we performed limited analyses of documentary evidence, to gather information about the processes and procedures for the collection, consolidation, processing and submission of the non-financial information to the function responsible for the preparation of the Report.



Moreover, for material information, considering the activities and characteristics of the Group:

- at Group level,
 - a) with reference to qualitative information included in the Sustainability Report, and in particular to the business model, the policies adopted and the main risks, we carried out interviews and acquired supporting documentation to verify its consistency with available evidence;
 - b) with reference to quantitative information, we performed analytical procedures as well as limited tests, in order to assess, on a sample basis, the accuracy of consolidation of the information;
- for the following mills of Reno de Medici SpA, Barcelona, Paprinisa and Eska (Hoozegand and Sappemeer), which were selected on the basis of their activities, their contribution to the performance indicators at a consolidated level and their location, we carried out a remote site visit (Eska mills) and a site visit (Barcelona and Paprinisa mills) during which we met local management and gathered supporting documentation regarding the correct application of the procedures and calculation methods used for the key performance indicators.

Conclusions

Based on the work performed, nothing has come to our attention that causes us to believe that the Report of Reno de Medici SpA for the year ended 31 December 2022 is not prepared, in all material respects, in accordance with the GRI Standards as disclosed in the paragraph “About this report” of the Report.

Milan, 27 April 2023

PricewaterhouseCoopers Business Services Srl

A handwritten signature in black ink, appearing to read 'Paolo Bersani', is written over a faint, light-colored signature line.

Paolo Bersani
(Partner)

Credits

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