



# Shaping the future of sustainable packaging



# About the report

## Ownership and legal form

VPK Group NV is a Belgian limited liability company whose registered office is located at Kareelstraat 108, 9300 Aalst, Belgium.

VPK Group NV is registered in the Register of Legal Persons of Dendermonde under the number 0400313852.

## Date of publishing

27<sup>th</sup> June 2025

## Feedback welcome

If you have any suggestions, comments or questions regarding this report or the CSR policy of VPK Group, do not hesitate to submit them.

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More about our sustainability management:

[vpkgroup.com/en/sustainability](https://vpkgroup.com/en/sustainability)



The sustainability report 2025 marks a significant step in the evolution of VPK's sustainability reporting. This year, our sustainability report is for the first time prepared in accordance with EU's Corporate Sustainability Reporting Directive (CSRD) and the associated European Sustainability Reporting Standards (ESRS), as outlined in ANNEX I to Commission Delegated Regulation (EU) 2023/2772. The CSRD is a regulatory framework established by the EU to enhance and standardise sustainability reporting among companies.

# Message from the CEO

This year marks a new chapter in our sustainability journey. For the first time, we have closely aligned our reporting with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). This is an important step towards our ambition to achieve full compliance by 2028. It's also a conscious decision to communicate more clearly, transparently, and consistently with all our stakeholders — not as a compliance formality, but as a meaningful step forward.

In this light, we completed our Double Materiality Assessment in 2024. This assessment forms the backbone of this report, helping us focus on the topics that matter most to both our business and the world around us. As key disclosures, the figures under ESRS E1 and E3 were externally verified. In parallel, we have published and updated a range of ESG-related policies on our website, further supporting stakeholder engagement and long-term accountability.

But reporting alone isn't enough — it's action that counts, and I am proud of what we have achieved.

We continued to reduce our carbon intensity and scaled up renewable energy across our sites. In 2024, 37% of our total energy consumption came from renewables, nearly 50% more than in 2020. We are firmly on track to reach our goal of 50% by 2030.

We are not only focused on our own carbon footprint, but also on helping our customers gain better insight into theirs. That is why we have developed our own in-house Product Carbon Footprint Calculator, a practical tool that calculates the footprint of their individual packaging.

Circularity is another cornerstone. Our packaging products are now made with 90% recovered paper, up from 87% in 2022. All our paper mills are FSC®-certified (FSC®-C109033) and use 100% recycled, CoC-certified fibres — proof of our commitment to responsible sourcing.

Our people are what make VPK Group a champion of sustainability. Monthly sessions with our sustainability ambassadors and steering committee — with active involvement from our Executive Committee — keep sustainability high on the agenda. This engagement, paired with local ownership, gives our ambitions staying power. With continued focus and shared commitment, I am confident we will keep driving meaningful progress for our company, our customers, and the planet.

“  
Reporting alone isn't enough —  
it's action that counts, and I am  
proud of what we have achieved.”



**PIERRE MACHARIS**  
CEO – VPK GROUP



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PART

1

# Introduction



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# Mission statement and values

As an international packaging group, we share a common company mission, a clear statement why our company exists and the direction we're heading to.

We push sustainable growth beyond tomorrow's standards, both ecologically and economically. We think and act globally, while staying close to our clients and their products.

To achieve this, we put an updated set of values at the heart of our company. They are the drivers of our company culture. Our own moral compass.

## Ownership



We own our **decisions** and **actions**, we encourage to try new things and dare to fail, we give **responsibility** and cultivate initiative.

## Trust



We have **confidence** in our people and clients, with one **handshake** you can set things in motion.

## Care

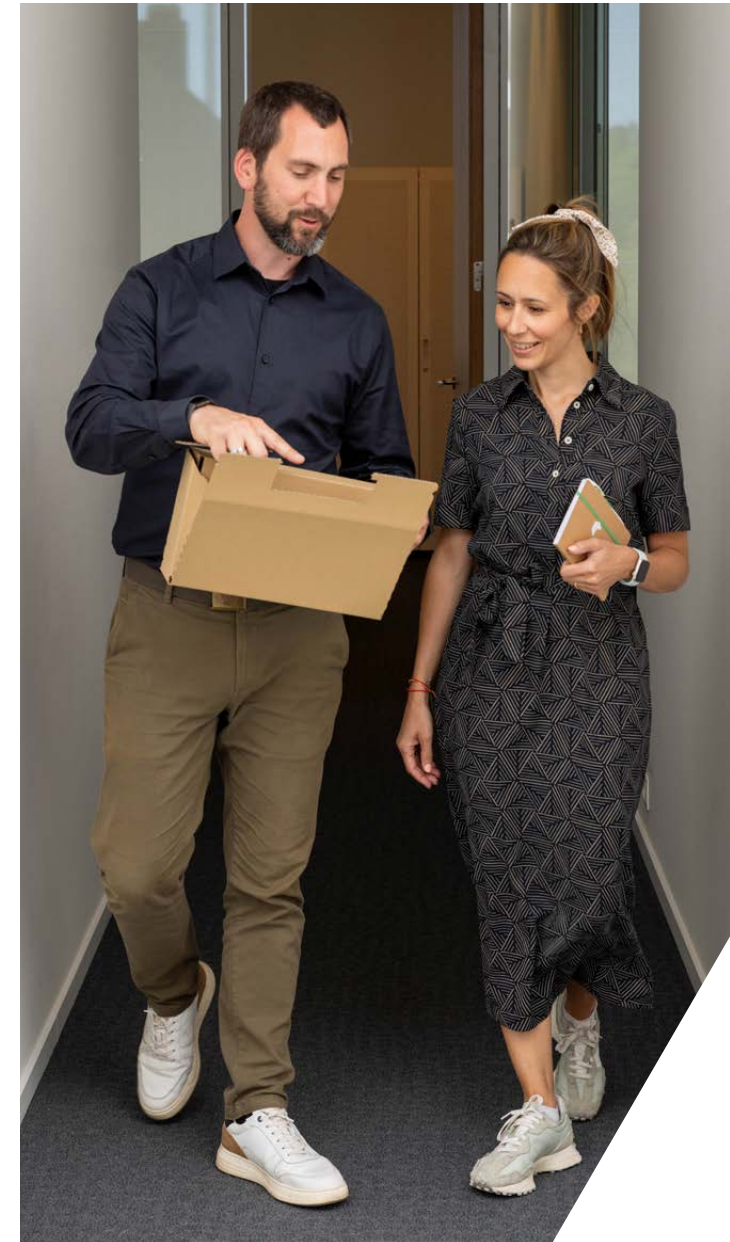


We are **dedicated** to the **well-being** of our people, our clients and our **planet**.

## Beyond



We **anticipate** the future. We **accelerate** where needed. We go **beyond** what is required.



# Growth and development

**1935**

VPK is founded in Oudegem, Belgium.

**2000**

Acquisition of Rigid UK.



**2005**

VPK acquires the Ondulys Group in France and starts producing cardboard sheets under the Aquila brand in Poland.



**2013**

Establishment of Corex's first factory in Turkey.

**2014**

Blue Paper Strasbourg becomes VPK Group's second paper production site.



**2016**

VPK acquires the Scandinavian Peterson Group, adding 6 plants across Norway, Sweden and Denmark.



**2019**

VPK takes over Corenso's European and Chinese divisions.

**2020**

VPK's strategic acquisitions include a majority stake in Viallon Emballage France, Corboard UK and Encase UK.

**2021**

Launch of the Alizay industrial site conversion project for sustainable development in the circular economy.

**2022**

Start of VPK's greenfield corrugated packaging operation, wall-to-wall to the Alizay paper mill conversion project.

**2023**

VPK takes a minority share in Ribble UK and enters Italy, acquiring Zetacarton. Corex acquires Arteche Paper, with 5 sites in Spain and Portugal.



**2024**

VPK continues its Italian expansion with the acquisition of IEMME.





# Strategy, business model and value chain (SBM-1)

## Overview of our products and brands

VPK Group is a leading packaging company founded in Belgium in 1935. Over the decades, it has grown from being a local player to an international supplier of sustainable protective packaging solutions, organized around three core product groups: corrugated board, solid board, and tubes and corner protectors.

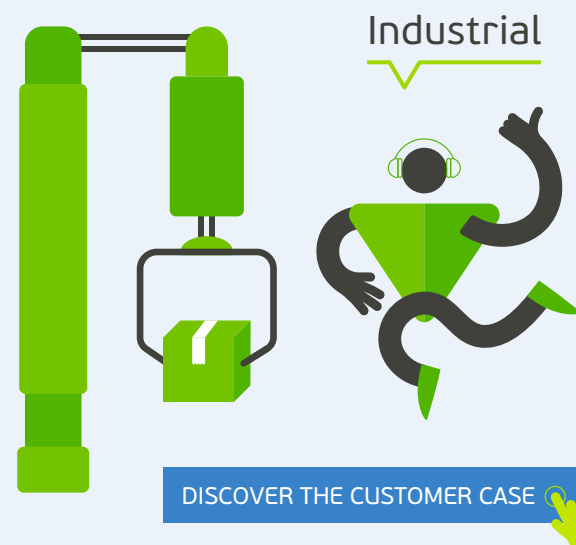
We strive to provide an optimal and reliable service by paying close attention to local markets and, at the same time, while sharing our expertise and knowledge across borders in order to create tailored solutions that meet our customers' expectations.

Each year, we recycle nearly 1.5 million tonnes of paper and board to produce our packaging solutions. We create value by efficiently using sustainable raw materials and respecting natural resources — all within a circular business model.

Our goal is for our products to be recyclable and biodegradable. In 2024, the products we brought to market were designed with this purpose in mind. We continue to assess and validate their performance to ensure they remain effective across various applications.



## Overview of our markets and customer groups\*



\* These markets represent the largest share of our customers, but are not exhaustive.



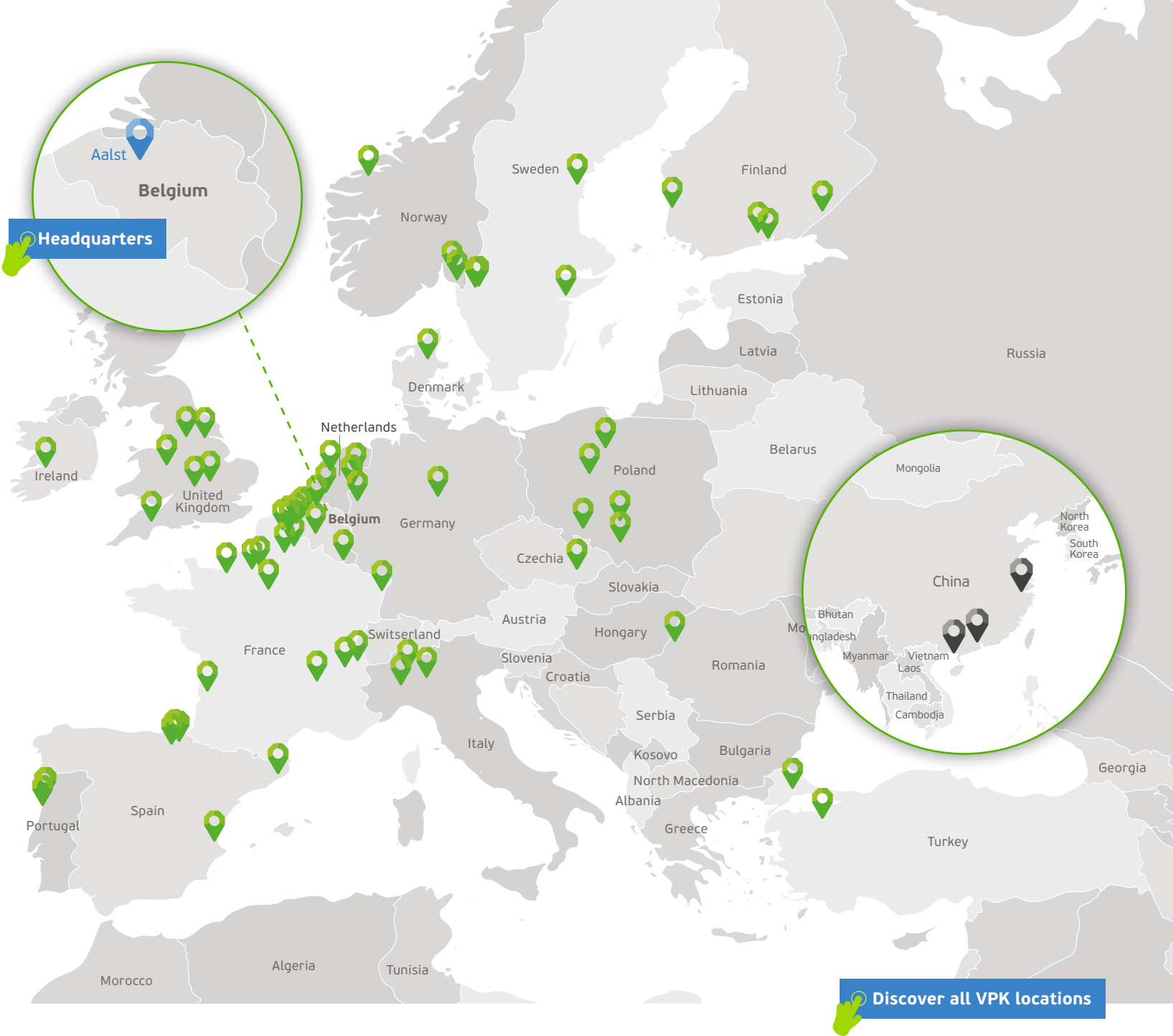
# Geographical presence

VPK is founding partner of Blue Box Partners, a pan-European alliance of four private capital run companies. Each partner is well-established and successful in its respective home market and shares the same structure, values and long-term business outlook.

Blue Box Partners' coordinated approach, with the combined expertise of more than 13,500 employees and the production capacity of 114 sites, ensures we can provide the bespoke designs and delivery requirements of any customer, large or small.

**BLUE BOX PARTNERS**

[▶ Discover all Blue Box Partners' locations](#)



## Business model

VPK Group's business model is built on a foundation of sustainable and innovative inputs. We use FSC®-certified raw materials to ensure our products meet the highest environmental standards. Our extensive network of over 70 manufacturing plants across 21 countries enables us to maintain a robust production capacity. We are committed to the principles of recycling and the circular economy, supported by our comprehensive infrastructure. Our supply chain and distribution networks are designed for efficiency and sustainability, ensuring timely delivery of materials and products. Our highly skilled workforce, comprising over 7,000 employees, drives our innovation and operational excellence. We leverage intellectual property, including innovative designs and patents, alongside digital tools and automation technology to enhance our production processes.

For our customers, VPK Group provides sustainable packaging solutions that are recyclable, biodegradable, and FSC®-certified, aligning with increasing regulatory and consumer demands for sustainability. Our optimized packaging designs reduce material usage, provide frustration-free experiences, and increase durability, leading to cost savings and improved logistics efficiency. We offer tailored packaging solutions for various sectors, including food, retail, industrial, and e-commerce, ensuring better product protection and branding opportunities. Additionally, customers can trace the origins and environmental impact of their packaging through VPK's [sustainability certifications](#).

Investors benefit from VPK Group's strong financial performance, including €1.8 billion in revenue for 2024, a profit before tax of €84 million, and an 7% compound annual growth rate (CAGR) over the past five years. Our family ownership structure ensures stable governance, a long-term vision, and resilience to market fluctuations, with a strong commitment to sustainability and reinvestment in research and development.

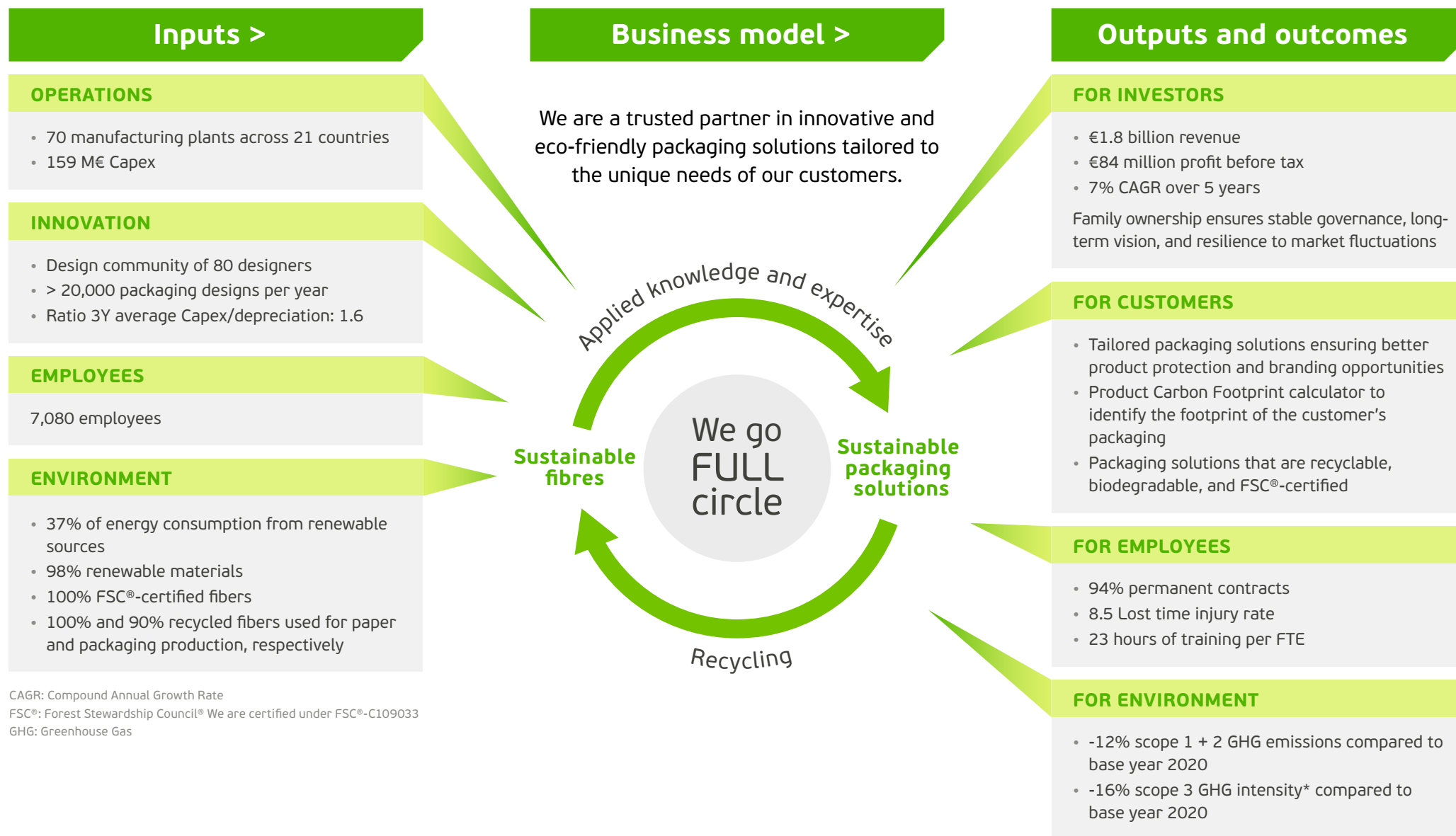
For our employees, we provide stable job opportunities and have achieved significant improvements in safety and wellbeing. Our Future Leaders Programme and annual 20 training hours per employee support leadership development and career advancement. This year, we improved our average training hours per employee by 20% compared to last year, further strengthening our commitment to continuous learning and development.

VPK Group is dedicated to environmental sustainability by using 100% recovered paper in our paper production. Additionally, 90% of the input paper used in our packaging production is recycled (non-virgin materials). 98% of our raw materials are sourced from renewable sources. Our net-zero target is validated by the Science Based Targets initiative (SBTi). We actively conserve water in our paper production processes and support reforestation and responsible forestry programmes. We also participate in industry coalitions like FEFCO (the European Federation of Corrugated Board Manufacturers) and CEPI (the Confederation of European Paper Industries) to promote regulatory frameworks supporting circularity.





# Business model



CAGR: Compound Annual Growth Rate

FSC®: Forest Stewardship Council® We are certified under FSC®-C109033

GHG: Greenhouse Gas

\* for purchased goods & transportation categories



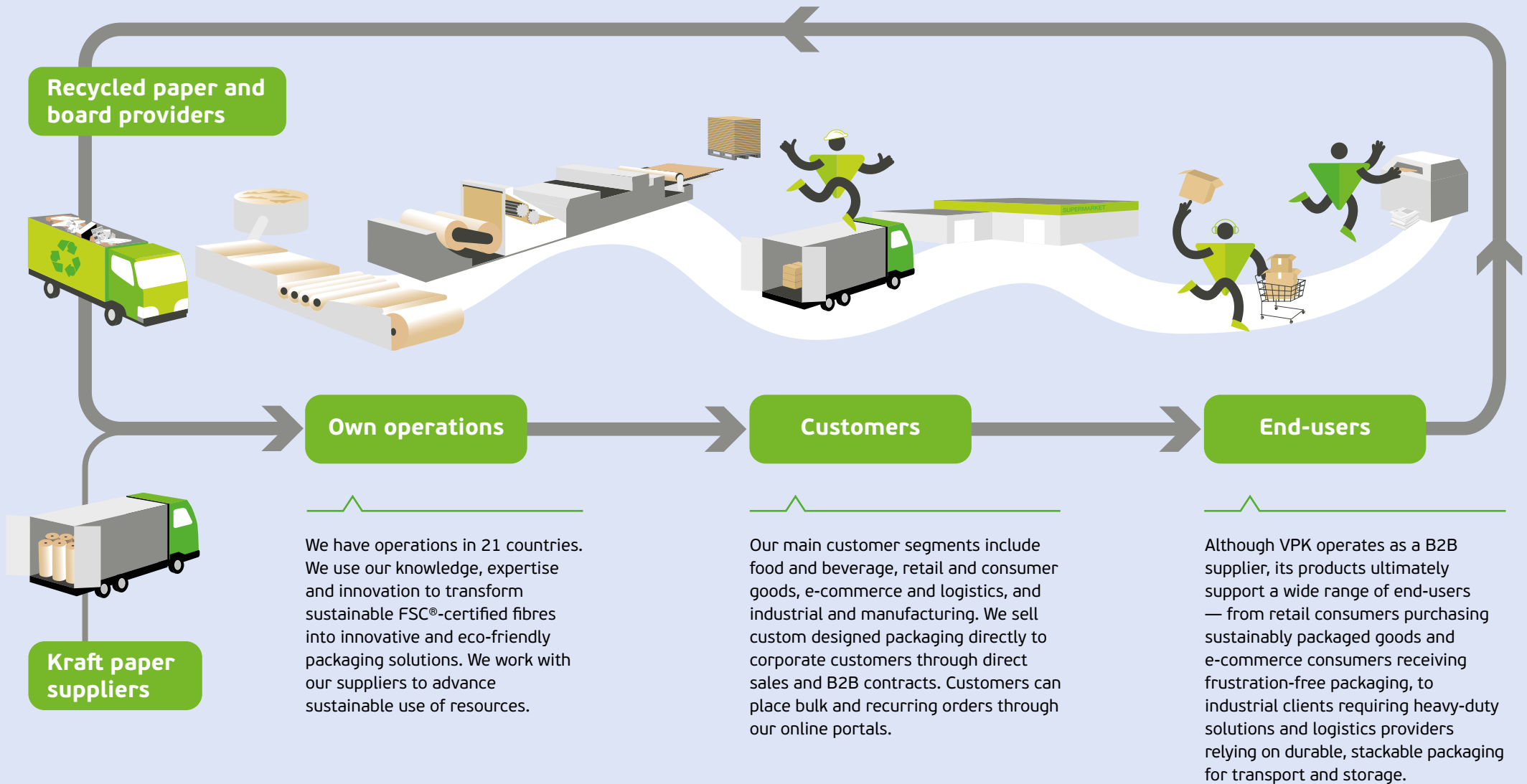
## Value chain

Our main suppliers include recycled paper and board providers; energy providers supplying renewable sources such as biomass, solar, and wind; machinery and technology partners for automated manufacturing equipment; and logistics and transport partners ensuring efficient supply chain management.

VPK Group serves B2B customers across various industries, providing custom sustainable packaging solutions. Our main customer segments include food and beverage, retail and consumer goods, e-commerce and logistics, and industrial and manufacturing. We sell custom-designed packaging directly to corporate customers through direct sales and B2B contracts, and customers can place bulk and recurring orders through our online portals.

Although VPK operates as a B2B supplier, its products ultimately support a wide range of end-user industries — from retail consumers purchasing sustainably packaged goods and e-commerce customers receiving frustration-free packaging, to industrial clients requiring heavy-duty solutions and logistics providers relying on durable, stackable packaging for transport and storage.

## Value chain







# Scale of the organization

	2022	2023	2024
Total number of employees (heads)	6,444	7,003	7,080
Total number of operations	64	70	70
Net sales (in m€)	2,129	1,818	1,849
% debt of total capitalization	/	/	/
Quantity of products sold corrugated (in Mm <sup>2</sup> )	2,231	2,095	2,256
Quantity of products sold corrugated (in ktonnes)	1,027	964	1,055
Quantity of products sold paper (in ktonnes)	960	1,056	1,283
Quantity of products sold cores and solid (in ktonnes)	426	425	456



# Sustainable corporate governance

**VPK Group is a private capital company owned by a limited set of investors who have a long-term commitment to the firm. This allows the company and its management to set out long-term goals and targets.**

## **Concentrated ownership**

VPK Group has a concentrated and stable ownership business model as opposed to dispersed ownership. Inside these concentrated models, values drive the business, and these instil responsibility.

## **Responsible Ownership**

Family Business owners inspire family values throughout a company and ensure that it is ready to be passed on to the next generation. Therefore, family ownership is, in essence, responsible and plays a fundamental role in sustainability practices and the guidance of a company's strategy.

## **Overcoming Short-Termism**

Short-term thinking in a business can have an adverse effect on sustainability and the perception of companies. One of the clear advantages of family companies is their long-term approach; meaning sustainability is already built in to the fabric of these enterprises.

# VPK Group's Sustainability Strategy

our  
sustainability  
goals

## Enhancing Our Environmental Footprint (E)

### E1 Climate change

- Reduce absolute greenhouse gas (GHG) emissions from our operations (Scope 1+2) by 42% by 2030, compared to the 2020 baseline.
- Decrease indirect Scope 3 GHG emissions per tonne of goods sold by 52% by 2030, compared to the 2020 baseline.
- For all GHG emissions achieve net-zero by 2050.
- Ensure that by 2030, at least 50% of total energy consumption comes from renewable sources.

### E3 Water and marine resources

- Reduce water withdrawal in our paper mills to below 6 m<sup>3</sup> per tonne of gross produced paper by 2025 (a 9% decrease compared to baseline 2019).

### E5 Resource use and circulaire economy

- Reduce landfill waste to 5.3 kg per tonne gross volume of produced paper by 2025.
- Minimize waste generation wherever possible, even when recyclable.
- Ensure that 100% of VPK's paper and at least 85% of packaging materials contain recycled fibers annually.
- Achieve a 100% deforestation-free and forest degradation-free supply chain for VPK's end products by 2025 (cut-off date: December 31, 2020).
- Guarantee that 100% of supplied materials for paper, corrugated boxes, and sheets are FSC® Chain of Custody (CoC) certified by 2025.
- Annually ensure that at least 90% of packaging sites maintain FSC® CoC certification.
- Annually maintain FSC® CoC certification across all paper production sites.

our  
contribution  
to UN SDGs



## Empowering People (S)

### S1 Own Workforce: Health & Safety

- Achieve a hazard and near miss close out rate of 85% per site (annual target).
- Reduce the Lost Time Injury Rate to below 6.5 (annual target for 2024 and 2025).

### S1 Own workforce: Wellbeing & Training

- Annually ensure that 100% of our employees receive at least the minimum wage applicable in their country or region
- Aim for 95% of contracts to be permanent every year.
- Annually conduct an employee engagement survey in at least 15 sites.
- Offer every full-time employee at least 20 hours of training and education per year.

### S2 Workers in the Value Chain: Health & Safety

- Ensure that by 2028, 90% of the spend with strategic suppliers is covered by the VPK Supplier Code of Conduct or an equivalent code.
- Ensure that by 2028, 90% of the spend with strategic suppliers is assessed through VPK's ESG Due Diligence process, evaluating social impact, environmental practices, and governance.



## Responsible Business Conduct (G)

### G1 Business Conduct

- By 2026, ensure 90% of VPK Group employees complete mandatory training on the Code of Conduct, incl. the whistleblowing system.





PART  
**2**

# General information

# content

## part 2

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# Basis for preparation (BP-1)

VPK Group's sustainability statements have been prepared on a consolidated basis with the same scope as the financial statements. They cover parent company VPK Group NV, as well as subsidiaries controlled directly and indirectly by VPK Group NV.

The sustainability statement covers the company's entire value chain, but we have only included material upstream and downstream value chain information. For a full overview of the value chain, see SBM-1: 'Strategy, business model and value chain'. The Double Materiality Assessment (see IRO-1) covers own operations upstream and downstream value chain. Policies, actions, targets and metrics covered in the topical standards extend to the upstream and downstream value chain where applicable.

VPK has chosen not to omit information related to intellectual property, know-how or the results of innovation.

For some datapoints, some companies may be excluded due to lack of data. Any exceptions are noted in each disclosure requirement.

All divisions and sites are included in the reporting scope. Acquisitions are incorporated from the moment they become part of the group, in line with financial reporting practices.

Joint ventures are reported consistently with other sustainability Key Performance Indicators (KPIs), based on the level of ownership:

- Less than 50% ownership: figures are not reported.
- 50% ownership: figures are reported proportionally (50%).
- More than 50% ownership: figures are reported in full (100%).



# Disclosures in relation to specific circumstances (BP-2)

## Time horizons

VPK uses the following time horizons:

- short-term time horizon: one year
- medium-term time horizon: one to five years
- long-term time horizon: more than five years

## Value chain estimation and sources of estimation and outcome uncertainty

Where estimates are used to report quantitative metrics or monetary amounts, such estimates and practices, including any related measurement uncertainty, are described in the 'Accounting principles'. Accounting principles are reported in the topical standard disclosures. When metrics include upstream and/or downstream value chain data estimated using indirect sources, such as sector-average data or other proxies, those are also reported in the 'Accounting principles'.

## Changes in preparation or presentation of sustainability information

The sustainability disclosures in this report have been expanded significantly to prepare for compliance with the requirements of European Sustainability Reporting Standards (ESRS). Where practices have changed, such changes are described in the corresponding accounting principle or in the section where the respective topic is reported.

## Reporting errors in prior periods

No material errors in prior periods have been identified, but some minor corrections have been made to individual metrics. Such corrections are described in the accounting principle of the respective metrics.

## Disclosures stemming from local legislation or generally accepted sustainability reporting pronouncements

This sustainability statement does not disclose information stemming from other legislation or from other sustainability reporting standards.

## Incorporation by reference

Information on how VPK's business model is adapted to manage material sustainability related impacts, risks and opportunities (SBM-3) is presented alongside the disclosures provided in relation to each material sustainability topic. Headcount of employees by geographical areas (SBM-1 Par. 40 (a) iii.) is reported in the 'Own workforce' chapter. Disclosure requirements in ESRS covered by the sustainability statement (IRO-2) is reported in Annex. Strategy, business model and value chain (SBM-1) is reported in Introduction.

# Role of administrative, management and supervisory bodies (GOV-1)

## Composition and diversity of the Board of Directors



**Veronique Hoflack**

Member since 2023

✔ **Areas of expertise**

Sustainability, business performance, operational excellence, energy



**Pierre Macharis**

Member since 1987

Member/chair of RemCo

✔ **Areas of expertise**

Strategy, business development, M&A, financial control, energy, machine engineering



**Carl Verstraelen**

Member since 2005

Member/chair of RemCo

✔ **Areas of expertise**

Compliance, finance, business performance, HR, sustainability, M&A



**Wolfgang de Limburg**

Member since 2018

✔ **Areas of expertise**

Strategy, financial analysis, business performance, M&A



**Dirk Meeus**

Member since 2004

Member/chair of RemCo

✔ **Areas of expertise**

Legal, compliance, M&A, business development



**Denis Zenner**

Member since 2024

(Also member 2005–2019)

✔ **Areas of expertise**

M&A, business, development, business performance



**Jean-Paul Macharis**

Member since 1987

Member/chair of RemCo

✔ **Areas of expertise**

Strategy, commercial excellence, operational excellence, machine engineering



**Carla Sinanian**

Member since 2023

✔ **Areas of expertise**

Strategy, digitalization, international organizational structuring

Number of executive board members	2
Number of non-executive board members	6
% independent board members	62.5%
% female board members	25%
% male board members	75%

There is no representation of employees or other workers in VPK’s Board of Directors.

## Roles and responsibilities of the Board of Directors in exercising oversight of the process of managing material IROs, and the role of management in these processes

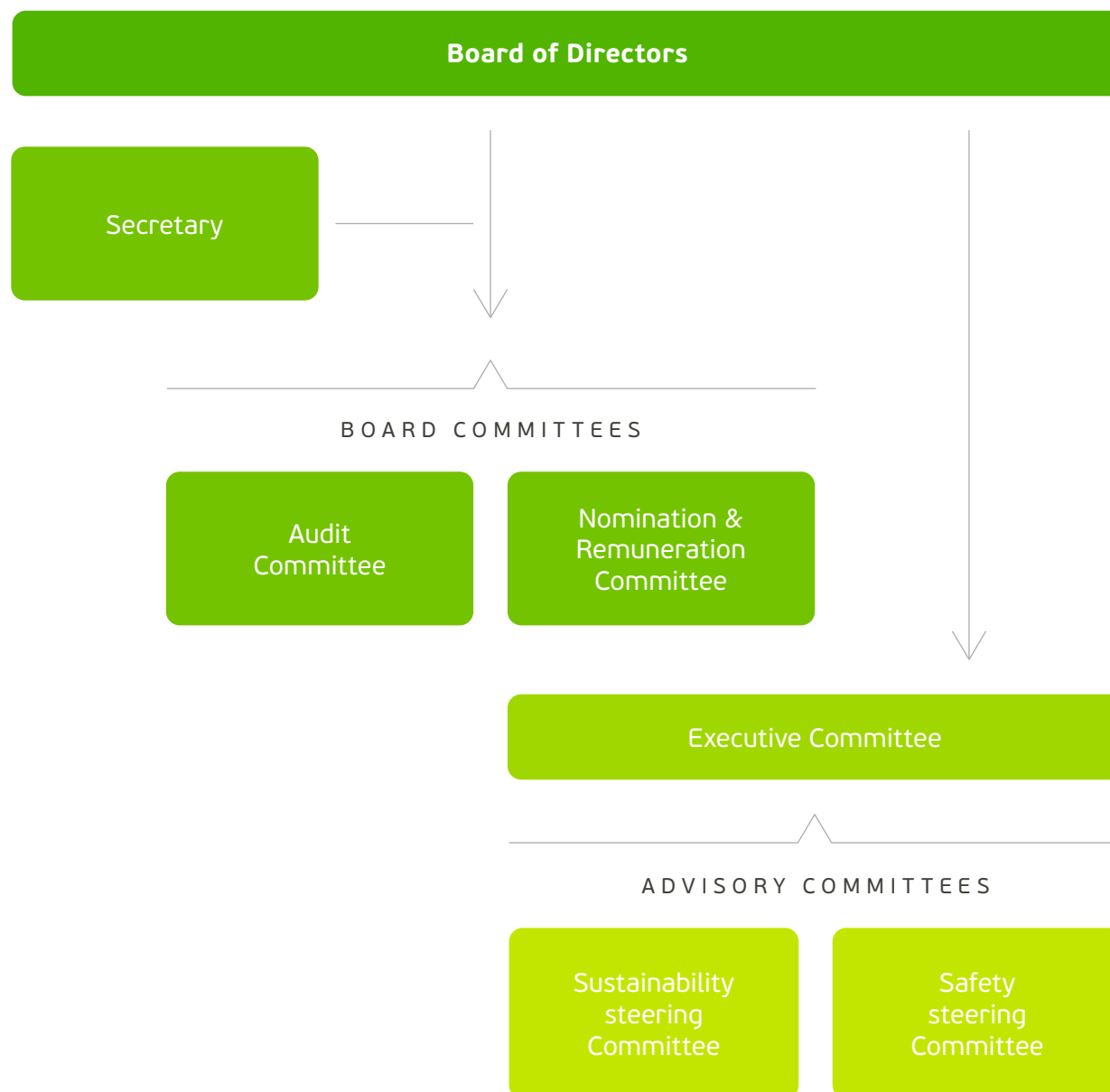
The roles and responsibilities of the Board are described in VPK's Corporate Governance Charter. A summary of these roles and responsibilities and the specific roles related to oversight of the process of managing material sustainability-related impacts, risks and opportunities are described below.

### Board of Directors

The Board of Directors is, together with the Executive Committee appointed by the Board, responsible for the management of the company. Our Board of Directors currently comprises 8 members (see table above). The Board of Directors supports sustainable value creation at VPK Group by defining the company's strategy and financial objectives, establishing effective, responsible and ethical leadership and overseeing the company's performance. The Board supervises the Executive Committee to ensure long-term value creation for the benefit of the company's stakeholders, including its shareholders.

The sustainability-related expertise of the Board of Directors covers the following material ESG topics:

- Environment: climate change mitigation, resource use and waste
- Own workforce: training and skills development, secure employment, adequate wages, work-life balance, health and safety
- Business conduct: corporate culture







## Board committees

The Board of Directors has established two committees, consisting of members appointed by and among the members of the Board of Directors: the Audit Committee and the Nomination and Remuneration Committee.

### THE AUDIT COMMITTEE

For the time being, the entire Board acts as the Audit Committee. The Board of Directors acting as Audit Committee (hereafter, the 'Audit Committee') ensures that the company's financial and sustainability reporting presents a true, fair and clear picture of the situation and prospects of the VPK Group.

Moreover, the Audit Committee reviews the internal control systems set up by the Executive Committee to ensure that the main risks (including those relating to compliance with existing legislation and regulations) have been properly identified, reported and managed. The Audit Committee assesses statements on internal control and risk management included in the annual report. The Audit Committee evaluates and formulates proposals regarding the specific arrangements under which employees or other stakeholders may raise concerns about possible irregularities (the so-called 'whistleblowing policy').

Our Internal Audit function reports to the Audit Committee and is independent of our administrative management structures. Internal Audit enhances and protects the organizational value by providing risk-based and objective assurance, advice, and insight. The focus for Internal Audit is to audit and advise on our core processes, governance, risk management, control processes, and IT security. Internal Audit receives and handles reports submitted through the whistleblowing channels when the Board of Directors deems it appropriate. Our employees and other associates may

report serious offences such as cases of bribery, fraud, and other inappropriate or illegal conduct to our whistleblower scheme or through our management system.

### NOMINATION AND REMUNERATION COMMITTEE

The members of the Nomination and Remuneration Committee are Dimacor BV, represented by Carl Verstraelen (Chair); Dirk Meeus; Perkament NV, represented by Jean-Paul Macharis; and Pierre Macharis. The committee assists the Board of Directors in examining specific issues and advising on the remuneration of members of the Board of Directors, the Executive Committee and members of the Senior Management of the VPK Group. It has an advisory function. Final decisions are made by the Board of Directors.

The Nomination and Remuneration Committee regularly evaluates size, composition and succession planning of the Board of Directors. The Nomination and Remuneration Committee handles the recruitment of new members and nominates candidates for the Board of Directors' approval. When identifying new candidates, VPK evaluates a broad range of candidates across competences, experience, gender, and nationality. The Nomination and Remuneration Committee determines whether appropriate skills and expertise are available or will be developed to oversee sustainability matters.

The different aspects of sustainability over which oversight is exercised by the Board of Directors and its committees are summarized in the table below. The responsibilities for material sustainability-related impacts, risks and opportunities are reflected in the Corporate Governance Charter.

Aspects of sustainability over which oversight is exercised	Body that exercises oversight	Form of oversight	Frequency	By whom informed
Assessment of and changes to sustainability-related aspects of the strategy and business model	The entire Board of Directors	Decision-making	4 times per year	CEO and other Executive Committee members
The identification and assessment of material IROs	The entire Board of Directors	Information	Annually	Sustainability Steering Committee
Related policies and targets, action plans and dedicated resources	The entire Board of Directors	Information	Annually	Sustainability Steering Committee
Sustainability reporting	The entire Board of Directors	Information	Annually	Sustainability Steering Committee
Interests and views of stakeholders with regard to sustainability-related impacts	The entire Board of Directors	Information	Annually	Sustainability Steering Committee

## Executive Committee

The Executive Committee is composed of the CEO (Chair), the CFO, the Head of the Paper Division, the Head of the Packaging Division, and the Head of the Specialties Division. The Executive Committee formulates proposals to the Board of Directors regarding the company's strategy and performance. The Executive Committee executes day-to-day management on behalf of VPK Group, which aligns with the overall and strategic directions set by the Board of Directors. The Executive Committee regularly reports to the Chair of the Board of Directors, who also participates in Executive Committee meetings on a regular basis, and the Group CFO regularly meets informally with the Chair of the Board of Directors.

In 2024, the Executive Committee consisted of four members with in-depth expertise and extensive knowledge of different areas of sustainability that relate directly to our material IROs.



**Pierre Macharis (CEO)** has extensive knowledge and experience within the following sustainability areas: climate change mitigation, water management, resource use and waste, health and safety, management of relationships with suppliers and corporate culture.



**Wim Naessens (Head of Paper Division)** has extensive knowledge and experience within the following sustainability areas: climate change mitigation, water

management, resource use and waste, training and skills development, secure employment, adequate wages, work-life balance, health and safety, management of relationships with suppliers and corporate culture.



**Erik Peeters (CFO)** has extensive knowledge and experience in all aspects of financial and non-financial reporting. He has insights into and control over the following sustainability areas: climate

change mitigation, resource use and waste, training and skills development, secure employment, adequate wages, work-life balance, health and safety, management of relationships with suppliers and corporate culture.



**Denis Zenner (Head of Specialties Division)** has extensive knowledge and experience within the following sustainability areas: climate change mitigation, water management, resource

use and waste, training and skills development, secure employment, adequate wages, work-life balance, health and safety, management of relationships with suppliers and corporate culture.



In June 2025, **Patrick Leclercq** joined the Executive Committee as **Head of the Corrugated Board Division**.

The Executive Committee sets the strategic direction for sustainability and is involved in all major sustainability-related decisions. The role of the Executive Committee in the governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities is delegated to the Sustainability

Steering Committee (for all sustainability topics) and the Safety Steering Committee (specifically for safety of own workforce). The Executive Committee is updated regularly on progress by the chair of the Sustainability Steering Committee and the chair of the Safety Steering Committee.

#### SUSTAINABILITY STEERING COMMITTEE

The committee consists of two Executive Committee members, namely the CFO and Head of Paper division, together with the Chief Legal Officer, the Group Controlling Manager, the Group Energy and Environmental Manager, the Group Environmental Manager, the Group Procurement Manager, and the Group Sustainability Manager. It is chaired by the Head of Paper division.

The committee ensures that we uphold our sustainability commitment. The committee's responsibilities include, among others:

- Discussing the findings and recommendations of the Group Sustainability Manager
- Identifying and assessing environmental, social, and governance (ESG) risks, and implementing risk mitigation strategies to address identified ESG risks
- Validating the Double Materiality Assessment
- Formulating and updating the company's sustainability strategy
- Developing policies and guidelines that promote sustainable practices across all business units
- Approving sustainability-related targets
- Approving action plans related to material impacts, risks and opportunities
- Monitoring progress towards targets and providing recommendations
- Encouraging a culture of sustainability among employees

- Validating sustainability reporting and other sustainability-related external communications

#### SAFETY STEERING COMMITTEE

The committee consists of two Executive Committee members, namely the Head of Specialties division and Head of Paper division, together with the Group Health and Safety Manager, Industrial Director and CTO VPK Packaging Group. It is chaired by the Head of Paper division.

The committee ensures we uphold our commitment to health and safety. Its responsibilities include:

- Reviewing group safety performance data and identifying areas for improvement
- Supporting and evaluating safety initiatives, such as the hand safety campaign and checklist development
- Enhancing machinery safety from procurement to use, including audits and training
- Improving safety data collection, reporting systems, and dashboard development
- Overseeing risk assessments, safety inspections, and corrective actions
- Advancing safety training, including eLearning, management training, and awareness programmes
- Investigating serious incidents, issuing safety alerts, and auditing hazard resolution
- Exploring new safety technologies like lift truck safety systems and AI-driven solutions
- Recognising and promoting safety achievements across sites

This ensures a proactive, consistent approach to workplace safety.







# Sustainability matters addressed by the administrative, management and supervisory bodies during the reporting period (GOV-2)

## Board of Directors and board committees

Four scheduled board meetings were held in 2024. The Nomination and Remuneration Committee and the Audit Committee met once. Topics discussed at these meetings included:

- Legal developments in the area of sustainability
- Remuneration guidelines (discussed at Nomination and Remuneration Committee)
- Sustainability-related risks and opportunities (discussed at Audit Committee)
- Sustainability reporting (discussed at Audit Committee)

## Executive Committee, Sustainability Steering Committee and Safety Steering Committee

The Executive Committee met 17 times in 2024, the Sustainability Steering Committee met 12 times (monthly), and the Safety Steering Committee met four times.

Topics discussed by these committees include:

- Approval of ESG policies
- Capex investments related to sustainability initiatives
- Approval of the ESG risk assessment approach and implementation of the corresponding tool
- Submission of our Science Based Targets for CO<sub>2</sub> emissions to the Science Based Targets initiative
- Updates of policies and targets for the following material topics: climate change, water and waste, deforestation and sustainable procurement
- Validation of the Double Materiality Assessment
- Sustainability reporting and related regulatory development
- Safety performance and risk management: monitoring safety data, inspections, and risk mitigation
- Safety training and awareness: expanding eLearning, management training, and safety programmes
- Incident prevention and response: investigating incidents, issuing safety alerts, and improving reporting
- Technology and innovation: implementing AI-driven solutions and advanced safety systems
- Safety standards and compliance: strengthening machinery safety, data reporting and site compliance

# Statement on sustainability due diligence (GOV-4)

Sustainability due diligence is the process whereby VPK identifies, prevents, limits and reports actual and potential negative impacts on the environment and people as a result of its activities.

Core elements of due diligence	Paragraphs and pages in the sustainability statement
<b>(a)</b> Embedding due diligence in governance, strategy and business model	GOV-2: p. 28 SBM-3: p. 32, 41, 58, 65, 79, 102, 110
<b>(b)</b> Engaging with affected stakeholders	GOV-2: p. 28 SBM-2: p. 31, 80 IRO-1: p. 35, 59, 65 Policies: E1-2: p. 41; E3-1: p. 60; E5-1: p. 68; S1-1: p. 81-82; S2-1: p. 103; G1-1: p. 111-112
<b>(c)</b> Identifying and assessing negative impacts on people and the environment	IRO-1: p. 33-37, 40, 58-59, 65, 79-80, 102, 110 SBM-3: p. 32, 41, 58, 65, 79, 102, 110
<b>(d)</b> Taking action to address negative impacts on people and the environment	Actions: E1-3: p. 43-45, p. 46-48; E3-2: p. 61-63; E5-2: p. 70-73; S1-4: p. 86-94; S2-4: p. 106-107
<b>(e)</b> Tracking the effectiveness of these efforts	Metrics: E1-5: p. 49, E1-6: p. 52-57, E1-7: p. 57; E1-8: p. 57; E3-4: p. 64; E5-4: p. 74; E5-5: p. 75-76; S1-6: p. 95-96; S1-8: p. 97, S1-9: p.97; S1-13: p. 98; S1-14: p. 99-101; S1-17: p101; S2 (entity specific): p. 107; G1-4: p. 115 Targets: E1-1: p. 42; E3-3: p. 60; E5-3: p. 69; S1-5: p. 86; S2-5: p. 105; G1: p. 113

# Risk management and internal controls over sustainability reporting (GOV-5)



Our objective is that VPK's sustainability reporting control systems should follow an approach similar to the financial reporting control system. The financial reporting control system consists of several elements:

- All guidelines with regard to management reporting and external financial reporting have been set out in detail in the Group Accounting Manual. The aim is to foster an effective and transparent financial reporting process, ensuring mutual comparability between all group companies. The accounting principles mentioned in this internal manual comply with the International Financial Reporting Standards (IFRS) and are adhered to by all companies within the group.
- Periodically, all staff members closely involved in the financial reporting process liaise, in order to discuss and address new accounting or financial topics in a structured way. For example, at the annual Finance Days, which bring together all key Group finance staff, new compliance requirements (IFRS, tax, CSRD, e-invoicing) are addressed in order to discuss and anticipate these initiatives well in advance.

- At a decentralized level, business controllers review financial data and report monthly to the Group Controller. Their in-depth local knowledge enables precise analysis of both financial and sustainability data. In addition, the Group Controller provides overarching coordination and ensures clear and consistent reporting to the Executive Committee.
- The Internal Auditor conducts an ongoing internal risk assessment as part of the internal audit programme, aimed at identifying risks of material misstatements, compliance assurance and control deficiencies in the preparation of the financial reporting. This assessment is based on materiality, the complexity of processes, and the probability of errors and omissions.
- All financial reporting is audited by an external auditor appointed at the Annual General Meeting. The assurance statement issued by the external auditor is included in this report.
- The Board of Directors, acting as the Audit Committee, oversees the financial and sustainability reporting process. This includes reviewing the internal risk assessment, the internal control framework and its operating effectiveness, as well as the findings of the external auditor.
- All observations arising from the internal risk assessment and the external auditor's report are addressed through action plans that assign clear responsibilities and deadlines, with regular follow-up and review.

In the course of 2025, these mechanisms will also be applied to the management of sustainability reporting risks. At present, no material risks related to sustainability reporting have been identified.



# Interests and views of stakeholders (SBM-2)

This table provides an overview of VPK's key stakeholders and outlines how the topics that matter to them are reflected in the company's strategy and business model.

Key stakeholder group	Channels for engagement	Purpose of engagement	Outcome and strategic impact	Integration in materiality assessment
Own workforce	Employee surveys, internal communication channels, health and safety committees, training sessions, performance reviews, townhall meetings	Ensuring a safe and sustainable work environment, fostering employee wellbeing and engagement	Implementation of health and safety improvements, training programmes, and employee wellbeing initiatives	Dedicated interviews (2024) with a set of employees were conducted to validate the material topics and determine the content of the report. All employees were asked to prioritise the material topics via a dedicated survey (2023).
Customers	Customer feedback surveys, direct meetings, sustainability reports, product innovation workshops	Understanding customer needs, ensuring product sustainability and quality	Development of sustainable packaging solutions, customer-driven innovation	In 2024, we conducted dedicated interviews with our largest customers to validate key topics and inform the content of this report. In addition, a 2023 survey invited the majority of our customers to prioritise the material topics.
Suppliers	Supplier feedback surveys, direct meetings, ESG assessments	Ensuring responsible sourcing, ethical business practices, and sustainability in the supply chain	Strengthened supplier sustainability standards, responsible sourcing commitments	In 2024, we conducted dedicated interviews with our biggest suppliers to validate key topics and shape the report's content. Additionally, a 2023 survey invited the majority of our suppliers to prioritise the material topics.
Local communities	Public meetings, community projects, partnerships with local initiatives, open house events	Supporting local development, ensuring positive social impact, addressing community concerns	Community benefit programmes, environmental initiatives, local employment opportunities	Based on feedback from public meetings, we have included key points as material topics
Sustainability associations (CDP, FSC®, UN Global Compact...)	Membership participation, compliance reporting, working groups, certification programmes	Aligning with global sustainability standards, contributing to industry best practices	Enhanced sustainability credentials, compliance with global frameworks	The annual update of certificates and submission of reports ensures their automatic integration into material topics.
Policymakers and regulators	Policy discussions, industry forums, regulatory consultations	Ensuring compliance with environmental and sustainability regulations	Alignment with regulatory requirements	The legal framework is included in material topics and due diligence.
Financial institutions	Financial institutions feedback surveys, direct meetings	Transparency on financial and sustainability performance, attracting responsible investments	Improved ESG ratings, alignment with expectations on sustainability performance	A dedicated 2023 survey invited financial institutions to prioritise the material topics.

# Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

The following tables list the material sustainability-related impacts, risks and opportunities we have identified and assessed as material as a result of our Double Materiality Assessment process. We indicate in the tables whether the impacts and risks occur or may occur in our own operations or upstream or downstream value chain. We also show whether our impacts are positive or negative. More information on the identified material impacts, risks and opportunities and how we respond to the effects of material impacts, risks and opportunities is included in the topical disclosures.

The DMA resulted in 19 material impacts and 12 material risks and opportunities:

ESRS Standard	Material sub-(sub-)topics	Number of material risks/opportunities	Number of material impacts	Where in value chain	Time horizon
<b>E1 Climate change</b>		<b>8</b>	<b>3</b>		
	<b>Climate change mitigation</b>	3	2	↗ +  + ↘	
	<b>Climate change adaptation</b>	4	0	↗ +	
	<b>Energy</b>	1	1		
<b>E3 Water and marine resources</b>		<b>1</b>	<b>1</b>		
	<b>Water withdrawals</b>	1	1		
<b>E5 Resource use and circular economy</b>		<b>3</b>	<b>5</b>		
	<b>Resource inflows</b>	2	2	↗ +	
	<b>Resource outflows</b>	1	2	+ ↘	
	<b>Waste</b>	0	1	↘	
<b>S1 Own workforce</b>		<b>0</b>	<b>9</b>		
	<b>Health and safety</b>	0	4		
	<b>Secure employment</b>	0	1		
	<b>Working time</b>	0	1		
	<b>Adequate wages</b>	0	1		
	<b>Work-life balance</b>	0	1		
	<b>Measures against violence and harassment in the workplace</b>	0	1		
<b>S2 Workers in the value chain</b>		<b>0</b>	<b>1</b>		
	<b>Health and safety</b>	0	1	↗	

Value chain ↗ upstream own operations ↘ downstream Time horizon short term medium term long term all time horizons

# Description of the process of identifying and assessing material impacts, risks and opportunities (IRO-1)

VPK's first materiality assessment was conducted in 2014 and subsequently updated in 2017, 2019, and 2023. In mid-2024, we carried out a Double Materiality Assessment (DMA) in accordance with the criteria defined in ESRS 1 and the implementation guidance issued by EFRAG. The DMA will be reviewed and updated at least every three years. In addition, it will be revisited in response to significant internal or external developments, such as major strategy revisions, new regulatory requirements, or shifting stakeholder expectations.

Based on the 2024 analysis, the following sustainability topics have been identified as material for VPK Group:

- Climate change (ESRS E1)
- Water and marine resources (ESRS E3)
- Resource use and circular economy (ESRS E5)
- Own workforce (ESRS S1)
- Workers in the value chain (ESRS S2)

Business conduct (ESRS G1) is not material for VPK Group. However, it was decided to report on this topical standard voluntarily, reflecting our commitment to transparency, ethical business practices, and legal and regulatory compliance — fostering trust and credibility among employees and other stakeholders.

As part of the Double Materiality Assessment, we evaluated 38 sub-topics and sub-sub-topics for materiality. Each was assessed based on impact, financial materiality, or both, as shown in the materiality matrix on the next page. Every (sub-)sub-topic is linked to specific impacts, risks, and opportunities (IROs). Those IROs deemed material form the basis of our topical disclosures. The complete list of material IROs per standard is provided in the respective chapters.



## Overview of the materiality matrix

### ENVIRONMENT

#### E1 Climate change

- 1 Climate change adaptation
- 2 Climate change mitigation
- 3 Energy

#### E2 Pollution

- 4 Pollution of air
- 5 Pollution of water
- 6 Pollution of soil
- 7 Substances of (very high) concern
- 8 Microplastics

#### E3 Water & marine resources

- 9 Water consumption
- 10 Water withdrawals
- 11 Water discharges
- 12 Marine resources

#### E4 Biodiversity & ecosystems

- 13 Impacts on the state of species
- 14 Other subtopics on biodiversity & ecosystems

#### E5 Circular economy

- 15 Resource inflows
- 16 Resource outflows
- 17 Waste

### SOCIAL

#### S1 Own workforce

- 18 Health and safety
- 19 Social dialogue, collective bargaining and freedom of association
- 20 Secure employment, working time, adequate wages, work-life balance
- 21 Equal treatment and opportunities for all
- 22 Training and skills development
- 23 Measures against violence and harassment in the workplace
- 24 Other work-related rights

#### S2 Workers in the value chain

- 25 Health and safety
- 26 Other working conditions
- 27 Equal treatment and opportunities for all
- 28 Other work-related rights

#### S3 Affected communities

- 29 All subtopics

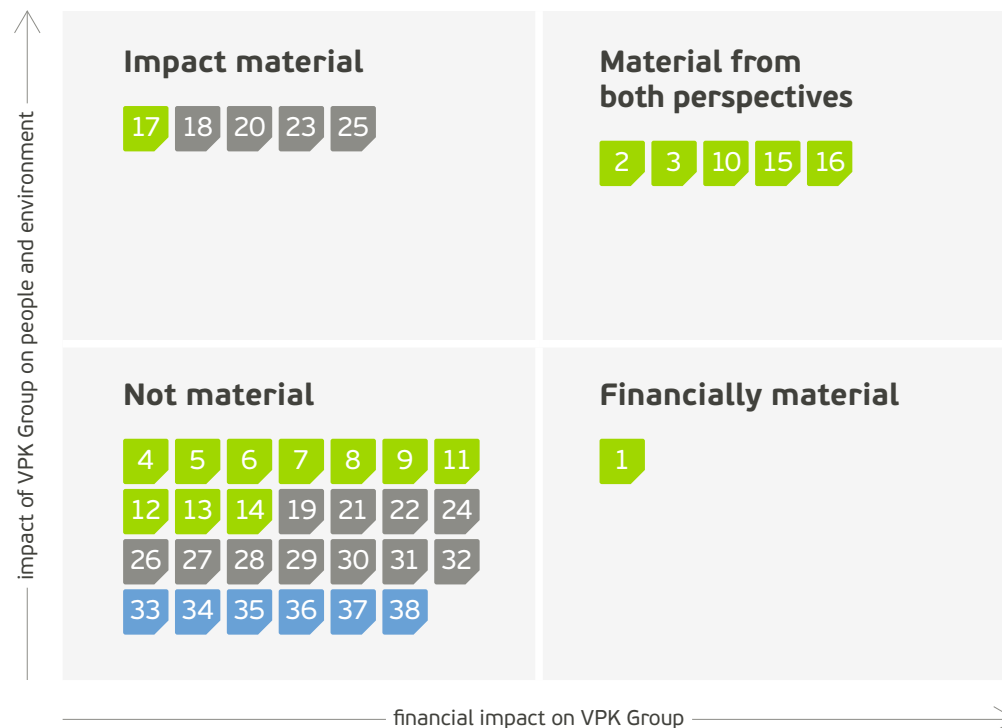
#### S4 Consumers and end-users

- 30 Information-related impacts for consumers and/or end-users
- 31 Personal safety of consumers and/or end-users
- 32 Social inclusion of consumers and/or end-users

### GOVERNANCE

#### G1 Business conduct

- 33 Corporate culture
- 34 Protection of whistle-blowers
- 35 Animal welfare
- 36 Political engagement and lobbying activities
- 37 Management of relationships with suppliers including payment practices
- 38 Corruption and bribery







## Scope and value chain

The DMA covered the entire VPK Group, including the full value chain and all geographies. In the upstream value chain assessment, the primary focus was on Tier 1 — direct suppliers and business partners — but other tiers were considered when material, particularly in relation to our paper supply chain). For the downstream value chain assessment, Tier 1 (corporate customers) and Tier 2 (end-users of our products) were considered.

Our analysis considered all time horizons (short term, medium term and long term).

## Stakeholder engagement

The interests and perspectives of both internal and external stakeholders were taken into account through a range of inputs, including employee engagement surveys, environmental impact assessments and customers' expectations — particularly from customers operating in highly regulated markets. Additional sources included requirements from local environmental authorities, past interactions with local communities and ESG ratings.

Secondary information used to inform the assessment included sectoral and national databases from the OECD, Eurostat, UNICEF, Our World in Data, the International Labor Organization (ILO), GEMStat, the Food and Agriculture Organization (FAO), the European Space Agency (ESA), Global Forest Watch, the Global Biodiversity Information Facility (GBIF) and the National Centers for Environmental Information (NCEI).

We also drew on insights from in-house subject matter experts, who acted as informed proxies for stakeholder perspectives during the development of the DMA.

In addition, VPK conducted structured one-on-one interviews with representatives of affected stakeholders, including five suppliers and five customers. Interviewees were first asked to share the results of their own materiality assessments, followed by qualitative feedback on VPK's materiality outcomes. Quantitatively, each stakeholder was also asked to identify which topics they would consider to be material for VPK. The interviews explored major IROs, action plans, other stakeholder needs, and opportunities for future data sharing.

## The four steps in our materiality assessment

1

### CREATING A LIST OF SUSTAINABILITY MATTERS AND RELATED IROS

To develop the list of relevant sustainability matters to be assessed in our DMA process, we considered several internal and external sources, including the list of sustainability (sub-)sub-topics contained within ESRS 2 Application Requirement AR 16. The final list of sustainability matters has been validated by internal subject matter experts, who were also responsible for identifying any related positive and negative impacts, risks, and opportunities related to each sustainability matter on the longlist, to be assessed from an impact and financial materiality perspective.

Internal financial experts participated in a workshop focused on scoring the financial materiality of the identified risks and opportunities. Through the periodic review of the enterprise risk management system and the integrating relevant ESG-related risks, VPK Group ensures alignment and consistency across its risk management processes.

From an impact materiality perspective, actual and/or potential negative impacts were assessed using four parameters:

scale, scope, irremediable character and likelihood. Actual and/or potential positive impacts were assessed based on three parameters: scale, scope and likelihood. All parameters were scored on a scale of one to five. For likelihood, an impact was assigned the maximum score of 5 if it had occurred, even if limited to a single geography or business entity.

From a financial materiality perspective, risks and opportunities were assessed using two parameters: the potential magnitude

of financial effects and the likelihood of occurrence. The magnitude of the potential financial effect was assessed based on specific financial criteria:

- Effects on sales, effects on operational costs and effects on operational down-time, relating to the cash flow and financial performance
- Effects on investments (current and future), asset value of the company and access to financing, relating to financial performance and position

2

### SCORING OF IMPACT MATERIALITY AND FINANCIAL MATERIALITY

Internal subject matter experts participated in a workshop dedicated to impact materiality scoring of the identified positive and negative impacts. As the subject matter experts are responsible for gaining knowledge about stakeholder views in their area of expertise as part of their everyday operations, they were able to incorporate these views into the impact assessment.

	Parameter	Question	Score of 1	Score of 5
Impact materiality	Scale	How significant ('grave') is the positive/negative impact of VPK Group on the topic?	(Very) small	Very large
	Scope	How widespread is the impact of VPK Group?	(Very) local, or 5% of individuals, or number of individuals lower than 50	Global, or 95% of individuals, or number of individuals higher than 1 billion
	Irremediable character	To what extent could negative impacts be remediated and the situation restored to its original state if the event occurred?	Easily remediable	Impossible to remediate
	Likelihood	How likely are the potential impacts?	Very unlikely	Very likely
Financial materiality	Magnitude	How large is the financial effect?	Less than €1 million, or one negative/positive review on Glassdoor	More than €100 million, or negative or positive presence in the international general media over a long period of time (several occurrences), or loss of operating permits/statuses
	Likelihood	How likely are the risks or opportunities?	Very unlikely	Very likely

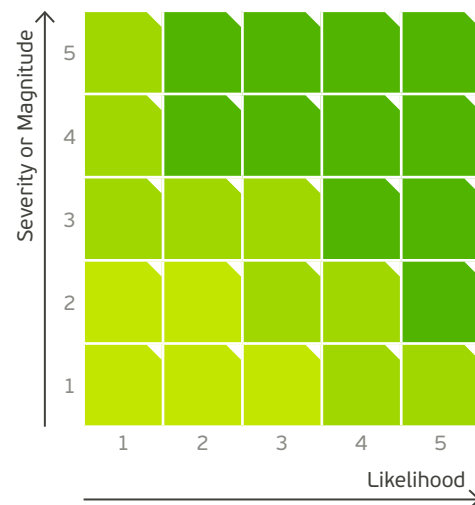
- Effects on company reputation, compliance and potential for talent acquisition

Each of these criteria was assessed based on the specific financial risk ranges as set by VPK's financial risk assessment. Both magnitude and likelihood were scored on a scale of one to five.

### 3 MATERIALITY THRESHOLDS

The threshold for determining the final materiality of a (sub-) sub-topic was based on the average score of the financial risks and/or opportunities, mapped onto a magnitude-likelihood matrix. Topics falling within the 'dark green' zone of the matrix were considered material (see figure below).

Any (sub-)sub-topic is deemed material for reporting if it is considered material from the perspective of impact materiality, financial materiality, or both.



### 4 VALIDATION

Following the assessment process, the consolidated results were reviewed and validated by the leadership team. At VPK Group, all key decisions related to the DMA approach and results are taken by the Sustainability Steering Committee and approved by the Board of Directors, as described in section GOV-1: 'Role of administrative, management and supervisory bodies'.





PART  
**3**

# Environmental information

# content

## part 3

Climate change (E1)

p.40

Water and marine resources (E3)

p.58

Resource use and circular economy (E5)

p.65

# E1 Climate change

## Material impacts, risks and opportunities related to climate change (IRO-1)

The Double Materiality Assessment conducted in 2024 (for more information on the materiality assessment process, see 'General Information', IRO-1), resulted in the following material impacts, risks and opportunities related to climate change:



Material topics and (sub-)sub-topic	Climate-related risks/opportunities	Where in value chain	Time horizon
<b>E1 Climate change</b>			
<b>Chronic physical risks</b>			
<b>Climate change adaptation</b>	▲ Water scarcity caused by climate change: reduced water availability could hinder the manufacturing process, which relies heavily on water for pulping and processing.		
<b>Acute physical risks</b>			
<b>Climate change adaptation</b>	▲ Extreme weather events: flooding, storms, and other extreme weather events could damage manufacturing facilities and disrupt supply chains.		
	▲ Forest fires: increased frequency and intensity of forest fires could lead to raw material shortages and increased costs.		
<b>Climate-related transition risks</b>			
<b>Climate change mitigation</b>	▲ Regulatory changes: stricter environmental regulations and policies aimed at reducing carbon emissions could increase compliance costs and require investments in cleaner technologies.		
	▲ Regulatory changes: implementation of carbon pricing mechanisms, such as carbon taxes or cap-and-trade systems, could increase operational costs for energy-intensive processes.		
<b>Climate-related opportunities</b>			
<b>Energy</b>	▲ Improving energy efficiency results in cost savings due to lower energy consumption.		
<b>Climate change mitigation</b>	▲ Reducing GHG emissions may lead to competitive advantage by keeping and gaining customers because of a low carbon footprint.		
<b>Climate change adaptation</b>	▲ Preserving and expanding forests supports climate adaptation by providing shade, cooling effects in summer, and other ecosystem benefits.		

Material risks/opportunities ▲ risk ▲ opportunity Value chain ↗ upstream own operations ↘ downstream  
Time horizon short term medium term long term all time horizons



Material topics and (sub-)sub-topic	Climate-related impacts	Where in value chain	Time horizon
<b>E1 Climate change</b>			
<b>Climate change mitigation</b>	● Direct and indirect emissions arise from operations, warehouses, and the broader value chain due to consumption of fossil fuels.	↗ + [factory] + ↘	■■■■
	○ Lowering carbon emissions through green technologies and partnerships: deploying cleaner technologies and collaborating with industry peers to drive sustainable transport and operational solutions.	↗ + [factory] + ↘	□■■■
<b>Energy</b>	○ Shifting towards renewable energy sources: increasing the share of renewable energy in VPK's operations.	[factory]	■■■■

**Material impacts** ● positive impact ○ potential positive impact ● negative impact ○ potential negative impact

**Value chain** ↗ upstream [factory] own operations ↘ downstream **Time horizon** □□□□ short term □□□□ medium term □□□□ long term ■■■■ all time horizons

## Resilience of our strategy and business model in relation to climate change (SBM-3)

Our company has developed a climate strategy that seeks to mitigate risks and improve our resilience to an evolving regulatory and market framework.

The ability of VPK's strategy to respond to climate change was examined in a climate resilience analysis conducted in 2024, following the Double Materiality Assessment. The resilience analysis covered our own operations and value chain. The strategy's resilience was assessed by comparing our capabilities against the material climate risks identified in the Double Materiality Assessment. Implementation of our climate transition plan (see below) will mitigate our material risks. The climate transition plan is an integral part of our overall business strategy and financial planning.

## Policies related to climate change (E1-2)

### Decarbonization policy

**Content:** VPK is committed to leading the way in decarbonization efforts, aligning with the Science Based Targets initiative (SBTi) and setting ambitious net-zero targets for 2050. VPK Group's [decarbonization policy](#) outlines our commitment to climate change mitigation, energy efficiency and renewable energy deployment.

**Scope:** This policy applies to all aspects of VPK's divisions and operations, including manufacturing, transportation, and office facilities. We aim to implement decarbonization measures across our entire value chain, working collaboratively with suppliers, customers, and stakeholders.

**Most senior level accountable for implementation:** Group energy manager and group procurement manager, reporting to the Sustainability Steering Committee and the Executive Committee.

**Third-party standards/initiatives:** Science Based Targets initiative (SBTi)

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible on company website; available to all employees and external stakeholders

### Supplier Code of Conduct

Our suppliers are required to commit to the terms of VPK Group's [Supplier Code of Conduct](#) or to their own equivalent codes. In the Supplier Code of Conduct, suppliers are encouraged to continuously improve their environmental performance. By incorporating this requirement into our Supplier Code of Conduct, we ensure that our environmental standards are upheld not only within our own operations but also among our suppliers. All details on the Supplier Code of Conduct can be found in section S2, 'Workers in the value chain'. The scope of the policy includes the entire value chain.

## Transition plan for climate change mitigation, including targets and actions (E1-1, E1-3 and E1-4)

### Greenhouse gas reduction targets and compatibility with limiting global warming to 1.5°C

Our climate ambitions are based on a successful transition to a 1.5°C economy and are in line with climate science and the Paris Agreement. We followed approved net-zero reduction targets aligned with the Science Based Target initiative (SBTi).

We have defined the following targets to reduce the climate impact of our own operations and create business opportunities by enabling our value chain partners to do the same:



- Overall net-zero target: VPK Group commits to reach net-zero greenhouse gas emissions across the value chain by 2050.
- Near-term target: VPK Group commits to reduce absolute Scope 1 and 2 greenhouse gas emissions by 42% by 2030, compared to 2020. Additionally, we commit to reducing Scope 3 emissions, from purchased goods and services and upstream transport and distribution, by 52% per tonne of goods sold within the same timeframe.
- Long-term target: By 2050, VPK Group commits to reducing absolute Scope 1 and 2 greenhouse gas emissions by 90% compared to 2020. We also commit to reducing Scope 3 emissions by 97% per tonne of goods sold.
- VPK will ensure that at least 50% of total energy consumption across all operations comes from renewable sources by 2030.

Scope	Parameters	NEAR-TERM TARGET Target year 2030	LONG-TERM TARGET Target year 2050
Scope 1 & 2	Absolute contraction	42% reduction*	90% reduction*
Scope 3	Physical intensity contraction	52% reduction*	97% reduction*

\* versus 2020 base year

VPK Group's climate transition plan is approved annually by the Board of Directors, following a review of the sustainability report by the Audit Committee. More information can be found in section ESRS2, 'General Information'.

Our carbon reduction and net-zero targets have been externally validated and approved by the Science Based Targets Initiative (SBTi) on 31 May 2024.

VPK Group is not excluded from the EU Paris-Aligned Benchmark.



## Decarbonization levers in our full value chain

### OWN OPERATIONS

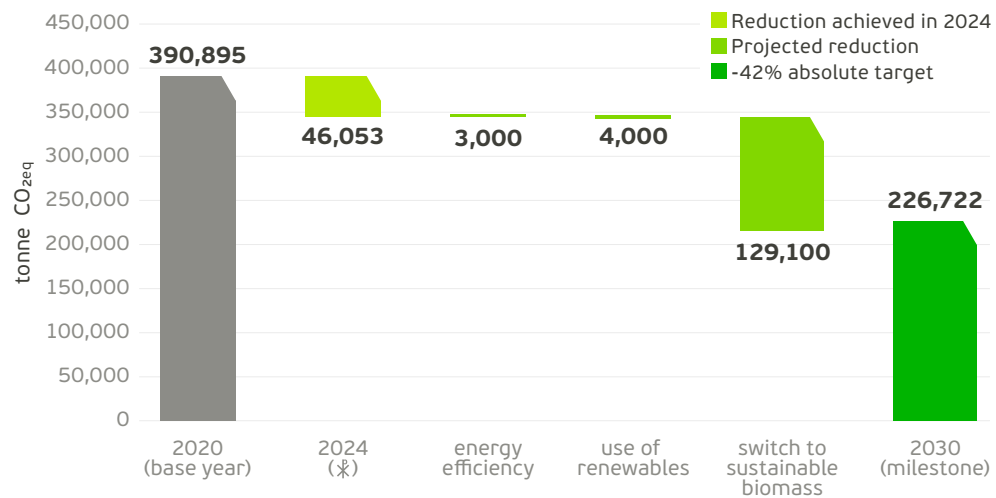
In order to achieve our Scope 1 and 2 climate targets, we have identified the following decarbonization levers for the period 2024-2030 in our own operations:

Lever	Scope 1	Scope 2
Fuel switch to sustainable biomass	129 ktCO <sub>2eq</sub>	
Energy efficiency	3 ktCO <sub>2eq</sub>	
Use of renewable energy		4 ktCO <sub>2eq</sub>

The projects behind each decarbonization lever are explained in the paragraph 'Key actions taken and planned' and have either been executed, are under construction or are in the preparation phase.

For the period 2030-2050 we will continue to monitor developments in areas such as hydrogen and electrification, as we expect these and other innovations to play a key role in the final stages of our transition to net zero.

### Achieved and projected GHG reductions in own operations



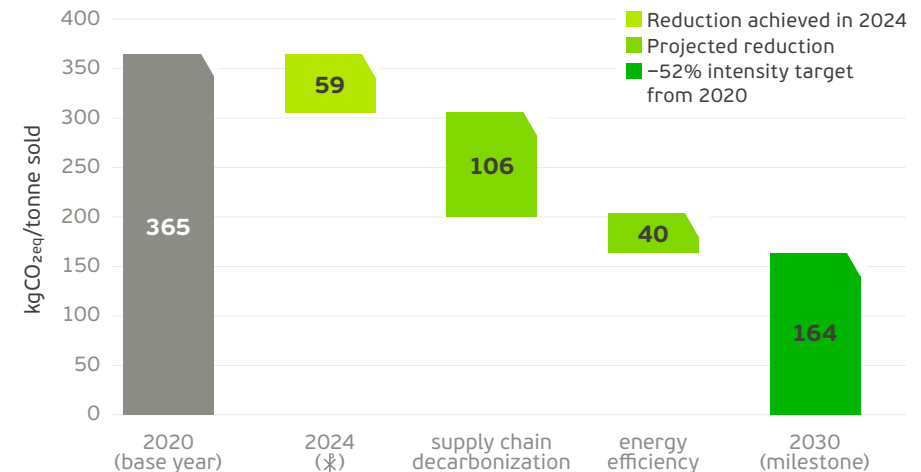
### UPSTREAM AND DOWNSTREAM VALUE CHAIN

To achieve our Scope 3 climate targets, we have identified the following decarbonization levers in the value chain for the period 2024-2030:

Lever	Scope 3
Supply chain decarbonization	106 kgCO <sub>2eq</sub> /tonne of goods sold externally
Energy efficiency in transportation	40 kgCO <sub>2eq</sub> /tonne of goods sold externally

The projects behind each decarbonization lever are explained in the paragraph 'Key actions taken and planned' and have either been executed, are under construction or are in the preparation phase.

### Achieved and projected GHG reductions in the upstream and downstream value chain





## Key actions taken and planned

### OWN OPERATIONS

#### Actions taken in 2024

In 2024 we implemented several projects related to the three carbonization levers in our own operations:

**Lever 1 – Energy efficiency.** The Blue Paper site in Strasbourg has been equipped with a ‘Blue Circle’ rotary kiln that generates energy from (mainly) internal waste (e.g., wood, textiles, plastics and other waste materials from recovered paper). We have also installed a belt dryer that reduces the moisture content of the waste from 45% to 10%. This significantly improves the efficiency of the combustion process, resulting in a Scope 1 emission reduction of approximately 3 kt CO<sub>2eq</sub>.

**Lever 3 – Switch to sustainable biomass fuel.** We implemented a biomass project to reduce fossil fuel consumption in the moving grate boiler at the Oudegem paper mill. By replacing approximately 40 to 50% of the coal with sustainably sourced wood pellets, this initiative aims to cut Scope 1 emissions by 25 kt CO<sub>2eq</sub>.

In addition to these larger projects, we are continuously working on enhancing energy efficiency in our sites and electrifying our fleet.

Read the case article on our Product Carbon Footprint calculator on page 47.



### 2025 outlook

**Lever 1 – Energy efficiency.** By the end of 2025, as part of Corex Board Papeleira's decarbonization and energy efficiency efforts, an energy monitoring system will be implemented under the Resolution and Resilience Plan (RRP). This system will centralize electricity consumption data across key factory sections, enabling more efficient energy management. By analysing consumption deviations, immediate corrective actions will be taken and realistic energy reduction targets set. Continuous 24/7 monitoring will optimize energy allocation, enhance equipment maintenance, and support the implementation of energy efficiency measures. As a result, energy consumption and greenhouse gas emissions will be reduced, with an expected saving of 6.2 tCO<sub>2eq</sub>.



Biomass boiler, Corex Papeleira, Porto

**Lever 2 – Use of renewable energy.** In 2025, we will install additional photovoltaic panels at our Oudegem site, with a capacity of 1.2 MWp. This is expected to reduce Scope 2 emissions by approximately 0.2 kt CO<sub>2eq</sub> per year.

**Lever 3 – Switch to sustainable biomass fuel.** In 2025, we plan to implement a project at our paper mill in Porto, which operates entirely on recycled paper and cardboard. Previously, the mill relied solely on natural gas for steam generation. As part of our commitment to achieving carbon neutrality by 2050, we have invested in a biomass boiler. Partnering with a local company, we initiated the construction of a state-of-the-art biomass boiler on-site, representing a €4.5 million investment with promising financial and environmental returns. The biomass boiler, with a thermal capacity of approximately 10 MW, will produce an average of 10 tonnes of steam per hour. This steam production will use locally sourced wood chips from sustainable forest management practices, replacing the need for natural gas. This transition will avoid the consumption of approximately 50,000 MWh of natural gas annually, reducing Scope 1 emissions by about 10 kt CO<sub>2eq</sub>.

A second project for 2025 is the installation of a new anaerobic digester at the Corex Board Atlantic site. This installation is referred to as a methanizer, as anaerobic digestion yields methane. This methane gas is a suitable replacement for the natural gas used to power the on-site steam boiler. With the anaerobic digester in place, the site will partially fulfill its natural gas demand with green methane, reducing its need for fossil fuels by approximately 10%. This will result in a Scope 1 emission reduction of approximately 2 kt CO<sub>2eq</sub>.

## UPSTREAM AND DOWNSTREAM VALUE CHAIN

### Actions taken in 2024:

In 2024 we implemented several projects related to the two carbonization levers in the upstream and downstream value chain:

#### Lever 1 – Supply chain decarbonization.

- We selected suppliers with lower CO<sub>2</sub> intensity (tonne CO<sub>2eq</sub> per tonne of paper) using the Operational Master Planning (OMP) system. The CO<sub>2</sub> intensity of paper is integrated into our paper optimization tool, making CO<sub>2</sub> intensity a key factor in our Scope 3 network planning for paper. In addition to financial budgets, we now also implement an emissions budget to prioritize lower-carbon suppliers. This contributes to achieving our Scope 3 SBTi target of reducing Scope 3 GHG emissions from purchased goods by 52% per tonne of goods sold by 2030, compared to a 2020 baseline.
- We invested in further integration of the Normandy Paper mill in Alizay (France) in the VPK group which, at full capacity, will add 415,000 tonnes low CO<sub>2</sub> intensity paper to our network by 2026, significantly reducing our Scope 3 footprint. By using more of our own paper (integrated production), we will reduce the need to purchase paper externally, thereby reducing our purchased raw material CO<sub>2</sub> footprint. VPK Normandy Paper has very low CO<sub>2</sub> emissions as the site operates primarily on renewable fuels such as biomass and methane gas.

#### Lever 2 – Energy efficiency.

- We have implemented an automated transport planning system to enhance the efficiency of our transport and reduce our carbon footprint.
- Fully loaded trucks and optimized transport routes help reduce the number of kilometres driven while increasing efficiency. This results in a lower CO<sub>2</sub> footprint per tonne of product sold.

### 2025 outlook

Building on the progress made in 2024, we will take further actions in our upstream and downstream value chain:

#### Lever 1 – Supply chain decarbonization.

- We will further reduce GHG emissions from purchased paper by using the Operational Master Planning system and emissions budgeting to select even more low-carbon suppliers.
- In 2025, we will accelerate the integration of our Normandy Paper mill in Alizay, France. By expanding the use of our own low-carbon recycled paper, we continue to reduce our reliance on externally sourced materials and lower our Scope 3 emissions.

#### Lever 2 – Energy efficiency in transportation:

- We will enhance our automated transport planning system to further improve efficiency and lower emissions.
- We will also increase the use of fully loaded trucks and optimized routes, reducing distances travelled and lowering the CO<sub>2</sub> footprint per product sold.
- We will also expand intermodal transport solutions, incorporating more rail and waterway transportation alongside road transport to further reduce carbon emissions.

- To align with global decarbonization goals, the transport sector is expected to reduce its emissions by approximately 30% by 2030. In this context, we look to our transport partners to transition toward low-emission solutions and contribute to achieving this target. We expect our logistics suppliers to offer sustainable, lower-emission transport services as part of our shared commitment to climate action.

These initiatives will accelerate progress towards achieving our Scope 3 SBTi target.

### Potential locked-in greenhouse gas emissions

The potential locked-in emissions of our key assets are related to infrastructure that still consumes fossil energy, such as the gas turbine in the Oudegem site. We aim to further decarbonize our key assets in the coming years. Our transition plan, key actions and investments for reducing Scope 1 and 2 emissions are described above. There are no locked-in greenhouse gas emissions associated with the use phase of our products.



## Actions for climate change adaptation (E1-3)

At VPK, we recognize that climate change presents both acute hazards, such as extreme weather events, and chronic hazards, including shifts in water availability and availability of raw materials (virgin fibres) because of harvesting conditions in some regions. To ensure the long-term sustainability of our paper and corrugated packaging manufacturing processes, we are actively adapting our operations through a combination of nature-based measures, engineering solutions, and technological innovations.

### Water scarcity

As climate patterns evolve, we remain proactive in managing our water resources efficiently. To mitigate potential future risks, we have implemented:

- Engineering solutions: upgrading our water recycling and treatment systems to optimize efficiency.
- Technological solutions: deploying advanced monitoring systems to track and reduce water consumption in real-time.

More information on our actions related to water can be found in section E3, 'Water and marine resources'. By continuously improving our water management strategies, we minimize the impact of water scarcity on our operations while maintaining competitiveness in a changing climate.

### Flooding

All our facilities have undergone flood risk assessments, and we are implementing targeted measures to enhance their resilience. Our adaptation strategies include:

- Nature-based solutions: restoring natural floodplains and increasing vegetation buffers around our sites to absorb excess water.
- Engineering solutions: elevating critical infrastructure, reinforcing building foundations, and installing flood barriers to protect key assets.

### Fires

In response to the possible increase of frequency and intensity of forest fires, which threaten raw material availability (virgin fibres for paper production) and could drive up costs, VPK has taken proactive adaptation measures. These include increasing our in-house paper production capacity (e.g. the new Normandy Paper mill) and diversifying our sourcing through diversified purchasing and multiple suppliers.

By integrating these strategies, we are strengthening our resilience against climate-related disruptions, ensuring operational continuity and protecting our people, infrastructure, and supply chain. Climate adaptation is a continuous commitment, and by investing in robust practices today, we secure a sustainable future for VPK and its stakeholders.





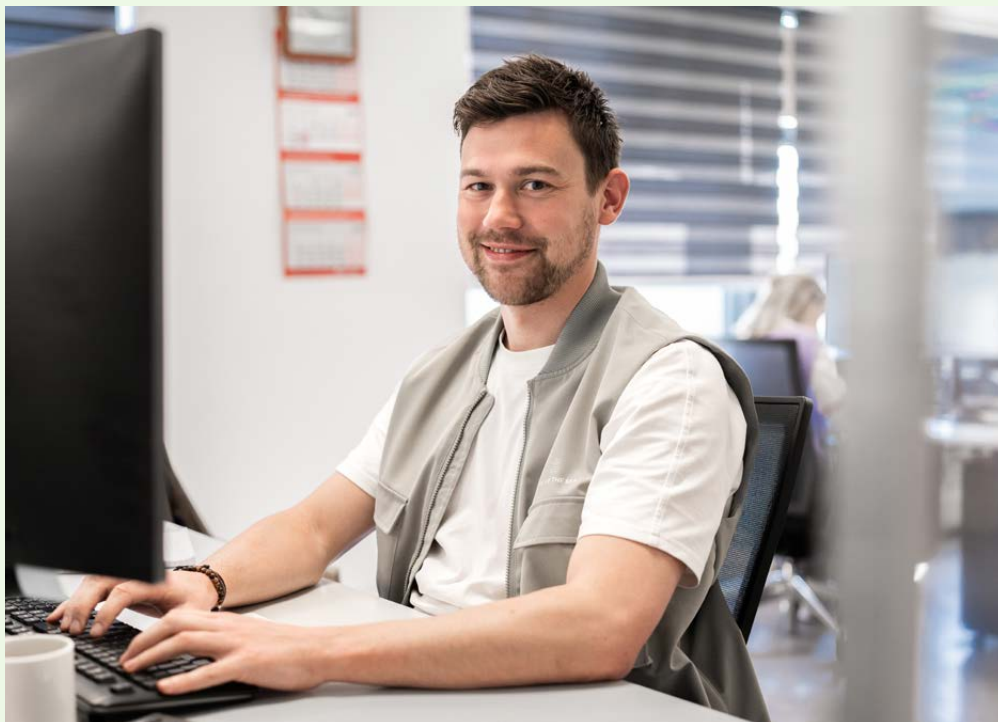
## The VPK Product Carbon Footprint Calculator: Empowering informed choices through carbon transparency

In line with our ambition to drive sustainability through innovation, VPK Group has developed and launched a Product Carbon Footprint (PCF) Calculator. This new tool enables our customers to assess the CO<sub>2</sub> impact of their packaging and align their purchasing decisions with their sustainability goals.

At VPK Group, we understand that more and more companies are looking to reduce their carbon footprint — not only within their own operations but throughout the entire value chain. With the PCF Calculator, we are supporting our customers in mapping their indirect (Scope 3) emissions, which often represent the largest part of their total carbon footprint.

### A reliable, science-based methodology

The PCF Calculator has been developed in-house, based on the PACT (Partnership for Carbon Transparency) framework, and aligned with the Greenhouse Gas Protocol and ISO 14064 standards. It calculates carbon emissions on a cradle-to-gate basis, measuring the footprint in grams of CO<sub>2</sub>eq per unit of



packaging. This approach ensures transparency, traceability and comparability across different packaging products and materials.

‘The PCF Calculator demonstrates our commitment to supporting our customers on their sustainability journey,’ says Nicolas Macharis, Head of International Sales. ‘It’s a practical, data-driven solution that adds value by turning carbon transparency into concrete action.’

### Enabling responsible decision-making

The calculation is embedded in our ERP system, based on verified internal data and operational parameters. The results are shared by VPK specialists through detailed product specification sheets or comprehensive portfolio reports, tailored to our customers’ information needs.

By integrating carbon footprint data into product specifications, VPK supports customers to make informed, climate-conscious choices. This helps them select packaging solutions that meet both performance and environmental criteria, and to prioritise lower-carbon alternatives where possible.

### Contributing to net-zero value chains

The development of the PCF Calculator fits within VPK Group’s broader climate strategy and net-zero roadmap. As part of our commitment to the Science-Based Targets initiative (SBTi), we aim to significantly reduce greenhouse gas emissions across all three scopes.

The tool provides valuable insights into the carbon footprint of our packaging products, including Scope 1, 2 and selected upstream emissions. By equipping our customers with these data, we help them better understand part of their Scope 3 emissions and potentially accelerate collaborative efforts to decarbonise the full value chain — one packaging decision at a time.

“

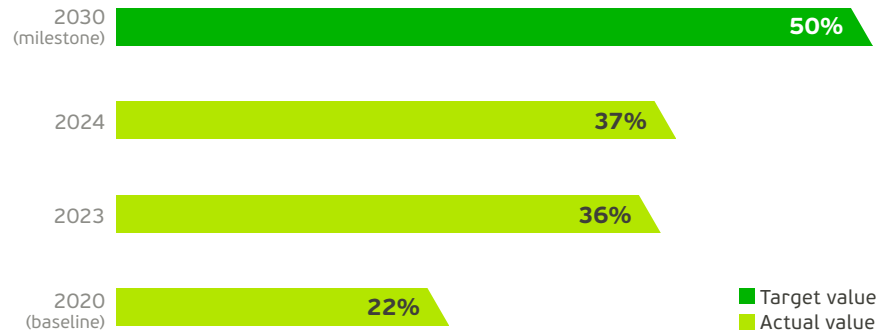
The Product Carbon Footprint Calculator demonstrates our commitment to supporting our customers in their sustainability journey.

NICOLAS MACHARIS,  
HEAD OF INTERNATIONAL  
SALES, VPK GROUP

## Metrics

### Energy consumption and mix (E1-5)

#### Share of renewables in total energy consumption



We continue to expand our use of renewable energy sources — such as solar panels, biomass boilers, and biogas — while steadily reducing our reliance on fossil fuels and lowering CO<sub>2</sub> emissions. Building on the progress of 2024, when renewables accounted for 37% of our total energy use, we are moving consistently toward our goal of 50% renewable energy by 2030.





## Energy consumption and mix

	2020	2024
(1) Fuel consumption from coal and coal products (MWh)	292,031	122,389
(2) Fuel consumption from crude oil and petroleum products (MWh)	17,216	15,927
(3) Fuel consumption from natural gas (MWh)	935,670	1,048,308
(4) Fuel consumption from other fossil sources (MWh)	82,310	52,077
(5) Consumption of purchased or acquired electricity, heat and steam from fossil sources (MWh)	169,342	248,564
(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	1,595,057	1,572,675
Share of fossil sources in total energy consumption (%)	77%	62%
(7) Consumption from nuclear products (MWh)	98,487	85,410
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	138,878	200,125
(9) Consumption of purchased or acquired electricity, heat and steam from renewable sources (MWh)	105,226	404,580
(10) Consumption of self-generated non-fuel renewable energy (MWh)	2,963	4,065
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	478,951	968,162
Share of renewable sources in total energy consumption (%)	22%	37%
Total energy consumption (MWh) (calculated as the sum of lines 6; 7 and 11)	2,172,495	2,626,247

## Energy production

	2020	2024
non-renewable energy production (MWh)	0	0
renewable energy production (MWh)	3,397	4,974

## Net revenue

	2020	2024
Net revenue from activities in high climate impact sectors used to calculate energy intensity (€ million)	1,362,000	1,849,000
Net revenue (other), (€ million)	0	0
Total net revenue (Financial statements), (€ million)	1,362,000	1,849,000

## Energy intensity per net revenue

	2020	2024	% vs. BY*
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/EUR million)	1.52	1.37	-10%

\* BY: base year



At VPK, we have made significant strides in both energy transition and decarbonization in recent years. Our efforts are driven by a clear focus on sustainability, resilience, and long-term value creation.

One of our most impactful achievements is the sharp reduction in our use of coal and other fossil fuels. The share of fossil sources in our total energy consumption has decreased from 77% in 2020 to 62% in 2024 – a key milestone in our journey towards a more sustainable energy mix.

We have also substantially increased our use of renewable energy. Total renewable energy consumption for all VPK sites has nearly doubled, rising from 478,951 MWh in 2020 to 968,162 MWh in 2024. Consequently, the share of renewables in our energy mix has grown from 22% to 37%.

Our renewable energy production in 2024 is nearly 1.5 times higher than it was in 2020.

## Accounting principles

'Fuel consumption from coal and coal products, crude oil and petroleum products and natural gas' refers to the consumption of these fuels at VPK sites. 'Fuel consumption from other fossil sources' refers to the consumption of the fossil part of rejected materials (non-usable paper production residues) at VPK sites.

'Consumption of purchased or acquired electricity from fossil sources, nuclear sources and renewable sources' refers to the shares of electricity generated from fossil, nuclear and renewable sources in the country-specific production mix, as reported by the Association of Issuing Bodies (AIB).

'Consumption of fuel from renewable sources' refers to the consumption of renewable fuel (e.g. wood pellets, biogas) at VPK sites. Renewable fuel combusted at VPK sites is determined based on the proportion of renewable content relative to total content of the fuel (both fossil and renewable). This can either be a component of the fuel (e.g., combusted rejected materials) or constitute 100% of the fuel (e.g., combusted biomass).

'Consumption of self-generated non-fuel renewable energy' refers to the gross amount of electricity generated on-site (e.g. from photovoltaic installations), minus any electricity fed into the grid or sold externally.

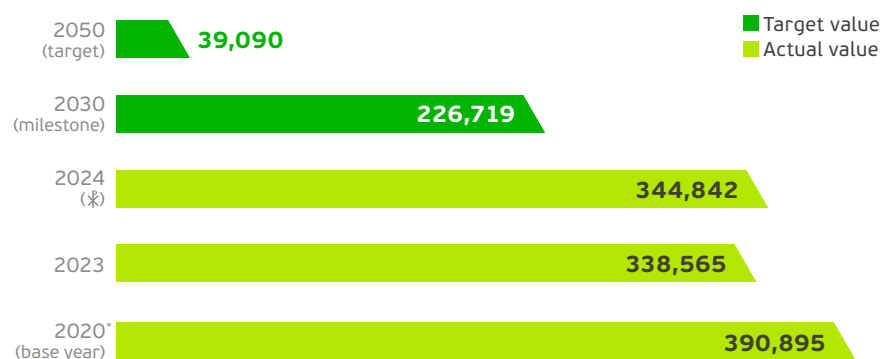
'Renewable energy production' refers to the amount of electricity produced on site by photovoltaic installations.

'Energy intensity per net revenue' is calculated as the total energy consumption of activities in high climate impact sectors divided by the net revenue of activities in high climate impact sectors. VPK specifies that for the purpose of this disclosure, all of its operations and sites fall under the definition of high climate impact sectors as specified in NACE, sections A–H and section L. VPK's activities fall under Division 17 ('Manufacture of paper and paper products'), within NACE Section C.

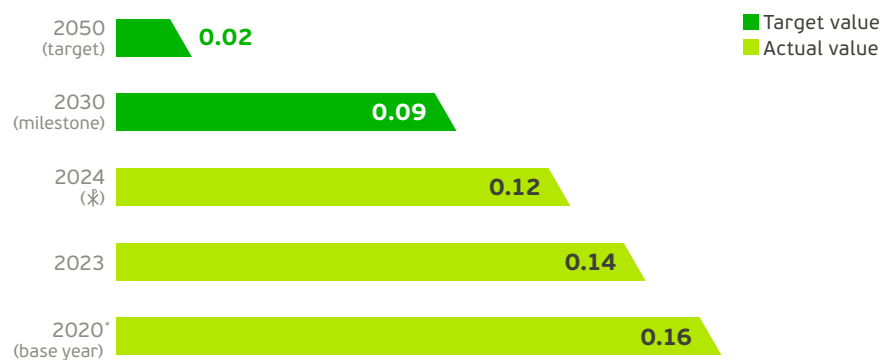
## Metrics

### Gross Scope 1, 2, 3 and total greenhouse gas emissions (E1-6)

#### VPK Group Scope 1 + 2 absolute emissions (tCO<sub>2eq</sub>)



#### VPK Group scope 1 + 2 intensity emissions (tCO<sub>2eq</sub>/tonne of goods sold)



#### Greenhouse gas emissions Papermills (ETS)

	2020* (base year)	2023	2024 (*)	% vs. BY**
Scope 1 emissions (tCO <sub>2eq</sub> )	273,929	236,554	228,738	-16.5%
Scope 1 biogenic emissions (tCO <sub>2eq</sub> )	83,322	113,492	114,158	37.0%
Scope 2 emissions (tCO <sub>2eq</sub> )	36,868	26,193	31,522	-14.5%
Scope 1 + 2 emissions (tCO <sub>2eq</sub> )	310,797	262,747	260,260	-16.3%

\* Rebased (as submitted to SBTi)

\*\* BY: base year

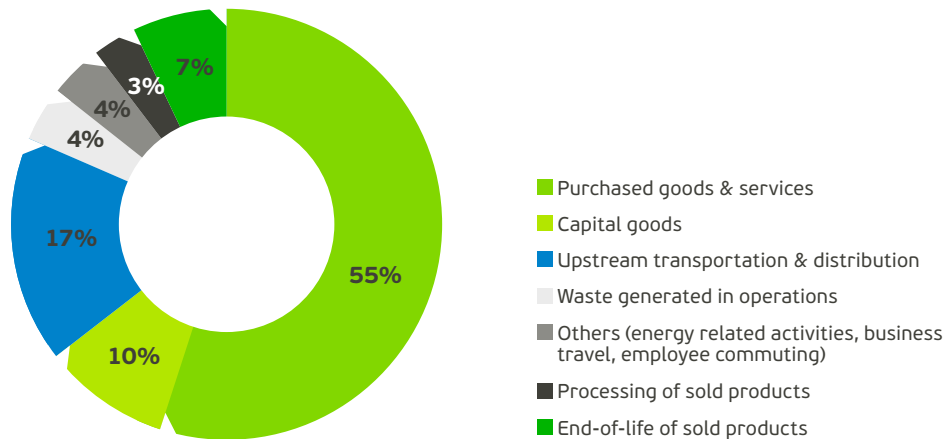
In 2024, Scope 1 emissions from our seven EU ETS-registered paper mills accounted for 83% of VPK Group's total Scope 1 emissions and 75% of the combined Scope 1 and 2 emissions. We observed a 37% increase in renewable energy use in our paper mills compared to our base year, reflecting our continued shift away from fossil fuels.

Total absolute Scope 1 and 2 emissions in 2024 were slightly higher than in 2023, this is primarily due to several acquisitions made during 2023. These sites have been included in our reporting from their respective acquisition dates, rather than for a full year. Additionally, increased production at our Normandy Paper site — which consumes more electricity than our corrugated sites — contributed to the rise.

Despite the increase in absolute CO<sub>2</sub> emissions (total of Scope 1 and 2), we achieved a clear reduction in carbon intensity (tCO<sub>2eq</sub> per tonne of goods sold) across all sites (see graphic below left). This demonstrates our ongoing commitment to delivering more sustainable products to our customers.

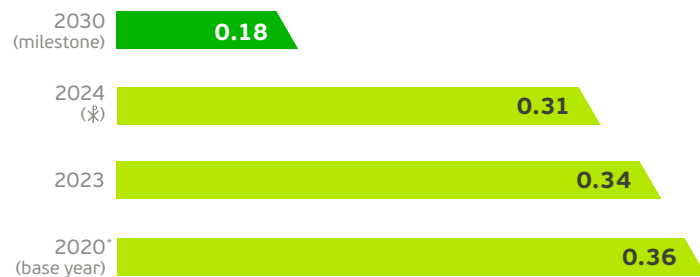


### Scope 3 emissions: share per emission category (※)



In 2024, we estimated that Scope 3 emissions accounted for approximately 72% of our total GHG emissions, amounting to 895,560 tCO<sub>2eq</sub>. Further analysis revealed that 89% of these emissions are concentrated in seven upstream categories. Notably, purchased goods and services, along with upstream transportation and distribution, alone represent 72% of total Scope 3 emissions. As a result, our reduction efforts are primarily focused on these two categories.

### Scope 3 intensity for purchased goods & transportation categories (tCO<sub>2eq</sub>/tonne sold externally)



A clear downward trend can be seen in the Scope 3 intensity for purchased goods and transportation (tCO<sub>2eq</sub>/tonne of goods sold externally). These areas are VPK's key categories and the focus of our most ambitious targets and active decarbonization strategies, as illustrated in the graph.

The graphic below left illustrates the combined emissions intensity of two key categories within VPK's Scope 3 emissions — purchased goods and transportation. Both categories are subject to near- and long-term Science Based Targets initiative (SBTi) commitments. Below is an explanation of the progress made in each category.

#### Lever 1 – Supply chain decarbonization.

Under the 'supply chain decarbonization' lever, we achieved an approximate 11% GHG intensity reduction, from 0.259 tCO<sub>2eq</sub> to 0.230 tCO<sub>2eq</sub> per tonne of goods sold externally in 2024 compared to 2023. This significant reduction was mainly driven by the increased use of our own low-carbon paper as the primary raw material for packaging and core products. By producing paper internally, we now have greater control over the carbon footprint of our inputs and have been able to eliminate the use of higher-emission paper from external suppliers.

#### Lever 2 – Energy efficiency in transportation.

Under the 'energy efficiency' lever, we achieved a GHG intensity reduction of approximately 10%, from 0.084 tCO<sub>2eq</sub> to 0.076 tCO<sub>2eq</sub> per tonne of goods sold externally in 2024 compared to 2023. This improvement resulted from targeted actions in transportation, particularly maximizing truck load capacity. By transporting more tonnes per shipment, we increased logistical efficiency and reduced emissions per unit of product moved.

Greenhouse gas emissions		Retrospective			Milestones and target years		
	2020* (base year)	2023	2024 (₯)	% vs. BY	2030 (milestone)	2050 (target)	Annual % target / BY
Scope 1 GHG emissions							
Gross Scope 1 GHG emissions (tCO <sub>2eq</sub> )	319,482	277,671	275,409	-13.8%	185,300	31,948	4.2%**
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	86%	85%	83%				
Scope 2 GHG emissions							
Gross location-based Scope 2 GHG emissions (tCO <sub>2eq</sub> )	71,413	60,894	69,433	-2.8%	41,420	7,141	4.2%**
Gross market-based Scope 2 GHG emissions (tCO <sub>2eq</sub> )	/	/	/	/			
Significant scope 3 GHG emissions							
Gross scope 3 GHG emissions (tCO <sub>2eq</sub> )	891,593	847,144	895,560	0.4%			
<b>upstream</b>	<b>803,128</b>	<b>762,987</b>	<b>798,711</b>	<b>-0.4%</b>			
Business travel	1,886	2,826	2,997	58.8%			
Capital goods	58,404	63,899	87,871	50.5%			
Employee commuting	5,516	5,678	6,115	10.9%			
Energy-related activities	28,063	27,877	27,837	-0.8%			
Purchased goods and services	541,011	491,158	495,504	-8.4%	0.18****	0,0145****	7%***
Upstream transportation and distribution	143,343	144,917	148,575	2.8%			
Waste generated in operations	24,905	26,632	30,984	24.4%			
<b>downstream</b>	<b>88,465</b>	<b>84,158</b>	<b>95,677</b>	<b>8.2%</b>			
End-of-life of sold products	59,373	57,872	65,353	10.1%			
Processing of sold products	29,093	26,286	30,324	4.2%			
Total GHG emissions							
Total GHG emissions (location-based) (tCO <sub>2eq</sub> )	1,282,488	1,185,709	1,240,402	-3.3%	absolute reduction: -42% for scope 1+2; intensity reduction: -52% for scope 3	net zero: absolute reduction -90% for scope 1+2; intensity reduction -97% for scope 3	
Total GHG emissions (market-based) (tCO <sub>2eq</sub> )	/	/	/	/			

\* rebased (as submitted to SBTi)

\*\* SBTi target/ linear annual reduction for scope 1+2 together

\*\*\* SBTi target/ year-on-year reduction for scope 3 categories purchased raw materials & transportation  
\*\*\*\* unit (tCO<sub>2eq</sub> / tonne sold externally)

## Absolute Scope 3 emissions trends

In the table above, we note a limited increase of just 0.4% in absolute Scope 3 CO<sub>2</sub> emissions in 2024 compared to the base year 2020 — remarkably modest considering that VPK Group has grown significantly, with production volumes rising by almost 13%. However, certain Scope 3 categories do show more pronounced increases, namely:

- Business travel: emissions in this category have doubled, largely due to the lifting of the COVID-19 travel restrictions that were in place in 2020. Additionally, improved reporting has contributed to the higher figures.
- Capital goods: a doubling of emissions in this category is linked to VPK's substantial investments in recent years. These include the construction of a new paper mill in France and the installation of biomass boilers and solar panels at multiple sites. While these are long-term sustainability improvements, they have contributed to higher short-term emissions.
- Increases in three categories (employee commuting, end-of-life treatment of sold products and waste) are primarily the result of VPK's growth through acquisitions and higher production volumes — almost a 13% increase in goods sold.

### GHG intensity per net revenue

	2020* (base year)	2024 (¥)	% vs. BY**
Total GHG emissions (location-based) per net revenue (tCO <sub>2eq</sub> /million EUR)	0.94	0.67	-29%

\* Rebased (as submitted to SBTi)

\*\* BY: base year

The table highlights a notable 29% decrease in total GHG intensity (tCO<sub>2eq</sub> per net revenue between 2020 and 2024. This decline demonstrates the effectiveness of VPK's measures to reduce environmental impact while maintaining financial growth, underscoring the company's commitment to more sustainable and efficient operations.

### Accounting principles (1/3)

Greenhouse gas emissions include emissions of CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, and NF<sub>3</sub>.

We follow the principles, requirements and guidance provided by the GHG Protocol Corporate Standard (2004 version). We use the most recent Global Warming Potential (GWP) values published by the IPCC based on a 100-year time horizon to calculate CO<sub>2eq</sub> emissions of non-CO<sub>2</sub> gases.

Gross Scope 1 GHG emissions:

- VPK Group calculates its GHG emissions from stationary combustion, mobile combustion, process emissions and fugitive emissions, using suitable activity data (including non-renewable fuel consumption) and consistent emission factors.
- Biogenic CO<sub>2</sub> emissions from biomass combustion or biodegradation are disclosed separately from Scope 1 GHG emissions.
- No removals, carbon credits, or GHG allowances are included in the calculation of Scope 1 GHG emissions.
- For activities under the EU ETS, VPK Group reports Scope 1 emissions following the EU ETS methodology. This includes all seven VPK paper mills, or more than 80% of the Scope 1 emissions. Typically, the CO<sub>2</sub> emissions of, for example, natural gas are based on regular local measurements of the actual consumed gas instead of standard data from literature.
- For activities not under EU ETS, VPK Group reports Scope 1 emissions following the GHG Protocol Corporate Standard (2004 version).

Gross Scope 2 GHG emissions:

- VPK Group calculates Scope 2 emissions following the GHG Protocol Scope 2 Guidance (2015 version).
- This includes emissions from purchased or acquired electricity, steam and heat consumed by VPK Group.
- VPK Group applies the location-based method to calculate Scope 2 GHG emissions.
- Similar to Scope 1, no removals, carbon credits, or GHG allowances are included in Scope 2 calculations.

Gross Scope 3 GHG emissions:

The Scope 3 inventory has been compiled in accordance with the Greenhouse Gas (GHG) Protocol – Corporate Value Chain (Scope 3) Accounting and Reporting Standard. Below, we provide additional details regarding the 2023 calculations per category, as well as their related assumptions:



## Accounting principles (2/3)

GHG category	Data treatment and assumptions	Emissions factors
Purchased goods & services	For Purchased Goods & Services, data has been collected for various material categories (e.g., paper, RCP) based on operational expenditures and sourced weight. CO <sub>2</sub> emissions have been calculated for 84% of the raw materials purchased. The remaining smaller purchases (e.g., glue, pallets, chemicals) were covered through extrapolation of the calculated amount. This extrapolation method applies the average emission factor for paper, RCP and starch to estimate emissions for the remaining categories, resulting in acceptably low inaccuracies. In total, 100% of operational expenditures are covered.	Supplier-specific data, FEFCO LCA 2021 for paper, Starch Europe for starch performed by Vito. Service emissions calculated using EEIO factors (ADEME).
Capital goods	A high-level assessment of emissions linked to capital investments (CAPEX Group overview), categorized by type of capital investment: safety-related investments, sustainability-related investments, land acquisitions and buildings, construction, and machinery and equipment. The data is based on annual expenditures.	EEIO emission factors from ADEME.
Energy-related activities	The emissions are calculated based on the consumption data reported for Scope 1 and the industry average upstream emissions as reported by the utilized emission factor database. Scope 1 and 2 company data were not adjusted or altered to calculate Scope 3 – Energy-related activities.	ADEME for fossil fuels, EEA for scope 2 emissions, IEA for upstream electricity emissions.
Upstream transportation & distribution	Emissions from transportation and distribution of purchased products and third-party services. This category includes inbound and outbound logistics, calculated based on the exact volumes transported by truck, ship and train. For the different categories within inbound and outbound logistics, assumptions have been taken to calculate the average distances.	The Global Logistics Emissions Council (GLEC).
Waste generated in operations	Emissions at the site level from third-party disposal and treatment of operational waste, categorized by type. If waste is recycled, only the emissions for collection and pre-treatment facility are accounted for.	ADEME emissions factors for each waste category and treatment type.
Business travel	High level assessment of emissions linked to business travel, including transport and accommodation, based on expenditure (EUR).	EEIO emission factors (ADEME).
Employee commuting	High level assessment of emissions from employee commuting to and from VPK site, split in car transport and public transport, based on average employee transportation distance in EU.	ADEME.
Processing of sold products	Calculation includes intermediate products which are sold to end customer and which are further processed by that customer into final products (mainly paper & sheets & coreboard cores). Residuals from production (clippings, etc.) are contained in these figures.	The emissions factor is calculated for the various processes as follows: Production of Cores: Based on Scope 1 & 2 data from VPK's COREX sites, excluding paper mills. Processing of Paper: Based on Scope 1 & 2 data from VPK's corrugated, feeder, and solid plants. Conversion of Sheets: Based on Scope 1 & 2 data from VPK's relevant conversion sites.
End-of-Life of Sold Products	Include end-of-life emissions of all sold intermediate and final products. Calculated based on disposal method and material type. An 82% recycling rate is assumed based on the FEFCO study, with the remaining 18% assumed to be incinerated. Only emissions from collection are considered for recycling. The biogenic emissions resulting from the incineration are calculated, but not included in the final carbon footprint.	ADEME, including collection, processing and incineration.

### ■ Accounting principles (3/3)

Total GHG emissions are the sum of Scope 1, 2, and 3 emissions.

GHG intensity based on net revenue:

- VPK Group discloses its GHG emissions intensity, calculated as total GHG emissions per net revenue following relevant guidance.
- The disclosure presents results for location-based method for Scope 2 emissions.
- VPK Group confirms that the net revenue value for this calculation is consistent with accounting standards (IFRS 15 or local GAAP).



## Other metrics related to climate change

### GHG removals and GHG mitigation projects financed through carbon credits (E1-7)

In line with the guidelines of SBTi, we prioritize direct emission reductions across our operations and value chain over removals or carbon offsetting projects. Our commitment to achieving net zero emissions by 2050 focuses on a substantial reduction of current emissions of at least 90%. In 2024, there were no greenhouse gas removals or greenhouse gas mitigation projects financed through carbon credits. We remain open to reassessing our approach in response to market developments in carbon removal and carbon offsetting.

### Internal carbon pricing (E1-8)

A significant portion of VPK Group's operations (the four paper mills) falls within the Scope of the EU Emissions Trading System (EU ETS). We receive a proportion of free European Union Allowances (EUAs) and purchase and surrender allowances to fulfil the company's compliance obligations under the EU ETS. The amount of surrendered and received EUAs is publicly available information. We also use the EU ETS carbon price in internal decision-making processes inside and outside of the EU, and the cost of carbon is integrated in financial and operational decisions. By including a carbon price in our analysis, costs related to CO<sub>2</sub> emissions become a variable operational cost at plant level and CO<sub>2</sub> price expectations influence future investment decisions.

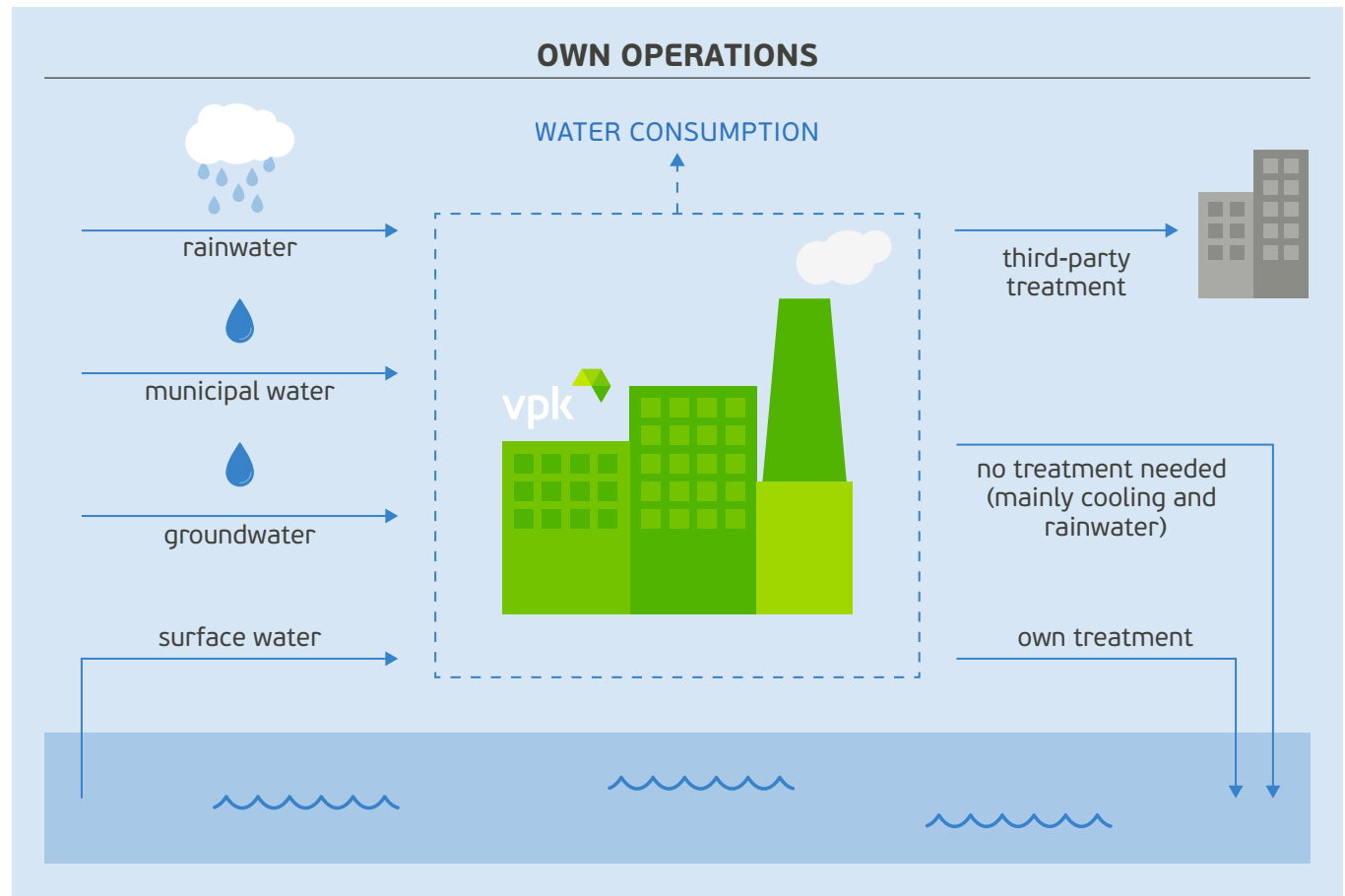
# E3

## Water and marine resources












### Material impacts, risks and opportunities related to water and their interaction with strategy and business model (IRO-1 and SBM-3)

The Double Materiality Assessment conducted in 2024 (for more information on the materiality assessment process, see General Information, IRO-1), resulted in one material impact and one material risk related to water. Both are related to water withdrawal at the paper mills, as water is an essential natural resource in the paper production process. Water withdrawal by the paper mills represents approximately 95% of total water withdrawal by VPK. As water withdrawal and discharge are approximately the same, water consumption is negligible. Water that evaporates in the drying section of the paper production process is recovered as condensate through heat recovery systems, thereby enhancing the overall energy efficiency of the process. Only a moderate portion, approximately 20-25%, evaporates into the air.

Diagram of waterflows





Material topics and (sub-)sub-topic	Material risks/opportunities	Where in value chain	Time horizon
<b>E3 Water and marine resources</b>			
<b>Water withdrawal</b>	▲ Operational shut-down due to a water withdrawal ban of water bodies.	 (only paper production sites)	
Material topics and (sub-)sub-topic	Material impacts	Where in value chain	Time horizon
<b>E3 Water and marine resources</b>			
<b>Water withdrawal</b>	○ Water scarcity could occur due to excess water withdrawal in the areas of water stress.	 +  +  (only paper production sites)	
<b>Material risks/opportunities</b> ▲ risk ▲ opportunity <b>Material impacts</b> ● positive impact ○ potential positive impact ● negative impact ○ potential negative impact <b>Value chain</b> ↗ upstream  own operations ↘ downstream <b>Time horizon</b>  short term  medium term  long term  all time horizons			

For the identification of water-related impacts, risks and opportunities in own operations, we took the overall physical water risk of the regions where our sites are located into account, based on a global water risk evaluation tool (the WRI Aqueduct Water Risk Atlas), as well as the water withdrawal intensity of our sites. Regions scoring above 40% according to the WRI Aqueduct Water Risk Atlas metric are considered water-stressed regions. We have two paper mills located in water-stressed areas, namely VPK Paper Oudegem in Belgium and Papeleira Coreboard in Portugal.

We actively engage with local communities to discuss the environmental impacts of our sites. For example, at our Oudegem site, we host an annual neighbourhood meeting where we address all environmental aspects, including

water. Impacts on local communities are also addressed as part of the Environmental and Social Impact Assessments for new industrial projects.

We closely monitor legal obligations and consult with the government about, for example, measures to limit water intake plans in the event of flooding.

### Strategic response to mitigating water risks

VPK's paper mill operations have a significant material impact on water, especially in regions where water scarcity is a growing concern. Excessive water withdrawal in areas of high water stress could lead to environmental degradation and economic challenges, posing regulatory and operational risks for the company.

To address these risks and minimize environmental impact, VPK has implemented and continues to explore multiple strategies, including:

- Reducing overall water consumption
  - Implementing water-saving technologies and optimising production processes to lower the volume of water withdrawn
  - Enhancing monitoring systems to detect inefficiencies and minimise unnecessary water waste
- Replacing freshwater with clear filtrated or reused water
  - Increasing the use of treated process water within operations to decrease dependence on fresh water
  - Installing advanced filtration systems that allow for the reuse of process water, ensuring water quality is maintained while reducing intake of fresh water
- Recycling and reusing treated wastewater
  - Investing in wastewater treatment facilities that enable purified wastewater to be reintroduced at the beginning of the production cycle
  - Exploring innovative wastewater purification technologies to enhance water recovery rates

### Financial and business model implications

- Cost savings and operational efficiency: Reusing water offers thermal energy benefits, leading to energy cost reductions. Additionally, minimising freshwater intake reduces regulatory fees associated with water withdrawal.
- Resilience against regulatory changes: By proactively investing in water-efficient solutions, VPK can mitigate the risk of operational shutdowns resulting from future water withdrawal bans.



## Policies related to water (E3-1)

### Environmental policy

**Content:** VPK's [environmental policy](#) addresses water management and sets out our ambition to design less water-intensive processes by reusing and recycling water. We treat production-related water discharge onsite and/or offsite and avoid water pollution by discharging water in accordance with local regulations. In the event of any breaches, we take corrective actions.

More specifically we commit to:

- Protect existing water bodies in accordance with the stand-still principle and thus prevent long-term deterioration
- Positively affect neighbouring water bodies that have been impacted by historical overconsumption
- Use water according to the following hierarchy: rainwater > surface water > ground water > municipal water (when technically possible)
- Reduce the impact of discharged water from our operations to a minimum

**Scope:** All aspects of VPK's divisions and operations, including manufacturing, transportation, and office facilities.

**Most senior level accountable for implementation:**

Group Environmental manager, reporting to the Sustainability Steering Committee and the Executive Committee

**Third-party standards/initiatives:** N/A

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible on company website; available to all employees, contractors and suppliers

### Supplier code of conduct

We also place expectations regarding responsible water management on our suppliers, as covered in our [Supplier Code of Conduct](#). All details on the Supplier Code of Conduct can be found in section S2, 'Workers in the value chain'. The scope of the policy includes the entire value chain. As marine resources are not a material topic to VPK, we have not adopted any policies or practices related to sustainable oceans and seas.

## Targets related to water (E3-3)

VPK has set an ambition to design less water-intensive processes, supported by a target that addresses the material impacts and risks associated with water withdrawal at its paper mills mills:



We aim to reduce the water withdrawal intensity of our paper mills to less than 6 m<sup>3</sup> per tonne gross volume of produced paper by 2025, representing a 9% decrease compared to the 2019 baseline and positioning us well below the industry average.

This target is relative and voluntary. It does not specifically relate to areas at water risk, nor is it based on conclusive scientific evidence.

## Actions and resources related to water (E3-2)

### Actions taken in 2024

We continuously take measures to avoid negative impacts related to water withdrawal and discharge:

- In VPK paper mills, water is recirculated up to 20 times during the production process, reducing the need for freshwater intake and lowering energy consumption for heating and pumping. Various technologies are used for the internal treatment of process water, including screens and disc filters. In total, 93% of the water we use is recycled.
- All process water is treated before discharge. Secondary purification is used for 95% of discharged water and applies to all VPK paper mills.
- VPK has a robust monitoring system to track key water quality parameters, including COD, BOD, suspended solids, oxygen levels, nitrogen, and phosphorus and many more. By continuously collecting and analysing data, VPK can identify trends, address potential issues promptly, and make data-driven decisions to improve its pollution reduction efforts. Discharged substances are measured on a continuous basis and reported at least annually to the competent authority.
- To manage our water impact, we have implemented environmental management systems. An overview of our ISO 14001-certified sites can be found on [p. 124](#). All paper mills are certified. Environmental managers and process technologists are responsible for careful water management in all sites.

Alongside these ongoing actions, we took the following specific actions in 2024:

- We replaced the traditional oscillating high-pressure shower on two forming fabrics with an ultra-high-pressure nozzle at the Blue Paper mill in France. This will result in a significant reduction in water consumption.
- The VPK Paper Normandie is in a start-up phase, with multiple ongoing projects focused on water efficiency.
- To purify wastewater with the long-term objective of reusing treated water as process water, we installed a new anaerobic digester at the Corex Board Atlantic paper mill in France. This installation, also known as a methaniser, removes organic load from the site's process water while simultaneously generating methane through anaerobic digestion. The methane produced serves as a valuable substitute for natural gas in powering the on-site steam boiler (see section E1: 'Climate change').

Site-specific investments in technology and equipment are made on an annual basis to enhance water efficiency. The amount varies year to year. In 2024, the VPK Group's water efficiency fund supported water-related investments of approximately €4.5 million at three production sites. This action supports the targets of reducing specific process water discharges and decreasing the trend for total water withdrawal as described in ESRS E3-3.

Read more about how Blue Paper's investment in a new factory cleaning system is saving water withdrawal. See page 62.

### 2025 outlook

To achieve our targets, we will employ various methods and strategies:

- Reducing the net water intake of our paper mills by continuing to implement operational improvements and enhancing management oversight
- Focusing on improving the water balance at three paper mills within the Specialties Division (SPS Loenen, Corex Pori, and Corex Board Atlantic), ensuring more efficiency and alignment with VPK's three key pillars:
  - Reducing overall water consumption
  - Replacing freshwater with clear filtrated or reused water
  - Recycling and reusing treated wastewater



## Blue Paper invests in new factory cleaning system, contributing to a reduction of 245,000m<sup>3</sup> in water withdrawal in 2024

Water is a critical resource in papermaking and therefore a key priority in VPK Group's sustainability strategy. In 2024, the Blue Paper mill in Strasbourg installed a new factory cleaning system to reduce its water consumption significantly, without compromising production quality. This investment contributed to a total reduction of 245,000 cubic metres in water withdrawal over the year.

At VPK Group, we are committed to reducing the net water intake of our paper mills to less than 6 m<sup>3</sup> per tonne of gross paper by 2025. This is a 9% decrease when compared to the 2019 reference year, and sits well below the industry average. As part of this ambition, Blue Paper's team identified an opportunity to reduce water usage

by improving the way inner and outer fabrics are cleaned in the paper machine.

### **From four high-pressure showers to two duo cleaners**

Blue Paper's previous setup consisted of four high-pressure showers, consuming 240 litres per minute owing to 35 bar water pressure. These showers sprayed





water continuously across the full width of the machine, removing 'stickies' and other contaminants from the inner and outer fabrics. These impurities can interfere with fibre bonding, compromising paper quality, but removing them required excessive water use.

In October 2024, the Blue Paper team installed a new solution: two compact duo cleaners fitted with multiple nozzles. Each duo cleaner features a motorised cleaning head that moves laterally across the machine, from the drive side to the tending side. These operate at a higher pressure – between 80 and 100 bar –

but only use 15 litres of water per minute. 'Despite the significant drop in water usage, the cleaning performance is at least as good, with clear potential for further improvement as we fine-tune the system,' explains Yann Landauer, Process Engineer at Blue Paper.

The cleaning process now takes place at the beginning of the machine run, limiting contamination and improving control over paper formation. 'With a saving of 15 m<sup>3</sup> per hour, the minimum annual impact is substantial: roughly 131,000 m<sup>3</sup> of water saved,' calculates Yann.

### A smooth implementation

The installation was carried out during a scheduled one-week maintenance stop. Working within such a tight timeframe was the main challenge, requiring precise coordination to dismantle one of the existing high-pressure showers, install mounting structures, and connect the new duo cleaner system. Yann highlights the importance of internal coordination: 'It was a tight window, but with good preparation and teamwork, we were able to meet our timeline without delaying production restart.'

To ensure operational flexibility, three of the original high-pressure showers were kept on site. These units serve as a back-up in case of technical issues or cleaning demands beyond the capacity of the new system. This redundancy allows the team to maintain high performance while continuing to monitor and optimise the new installation.

The new cleaning system is still being optimised, but its water-saving impact is already clear. As Yann puts it: 'We've proven that we can reduce water use significantly without compromising performance.' This is a promising outcome that reinforces VPK's group-wide ambition regarding water-efficient production and offers greater resilience as seasonal water stress becomes increasingly likely.

“

With a saving of 15 m<sup>3</sup> per hour, the annual impact is substantial: roughly 131,000 m<sup>3</sup> of water saved.

YANN LANDAUER,  
PROCESS ENGINEER,  
BLUE PAPER

## Metrics

### Water withdrawal (E3-4)

Regions without water stress				
Withdrawal in m <sup>3</sup>	2022	2023	2024 (✖)	% vs. LY*
Rainwater	20,864	20,557	34,353	67%
Surface water	2,006,107	1,894,377	1,907,799	1%
Ground water	2,451,575	4,204,200	4,367,682	4%
Municipal water	323,681	333,326	325,358	-2%
<b>Total water</b>	<b>4,802,226</b>	<b>6,452,460</b>	<b>6,635,192</b>	<b>3%</b>

Regions with high water stress**				
Withdrawal in m <sup>3</sup>	2022	2023	2024 (✖)	% vs. LY*
Rainwater	77,217	77,217	83,746	8%
Surface water	1,804,486	2,018,743	2,088,536	3%
Ground water	70,922	127,701	76,904	-40%
Municipal water	135,230	170,630	138,441	-19%
<b>Total water</b>	<b>2,087,855</b>	<b>2,394,291</b>	<b>2,387,627</b>	<b>0%</b>

\* LY: last year

\*\* We updated this in 2025. For VPK, we include locations in this category if the regions are characterised by significant stress (more than 40% on the WRI Aqueduct rating) and if there's also a high consumption of water present. This encompasses two paper mills situated in the regions of Belgium and Portugal.

#### Accounting principles

Surface and ground water withdrawal, whenever used, is measured by flow meters and registered daily in our online (IT) system. Very little municipal water is used in comparison, but this is also measured by internal meters and the consumption is also available on invoices.

Rainwater is measured in different ways: through internal meters and/or by calculating the volume of water based on the runoff surfaces of the respective site.

## Metrics

### Water withdrawal intensity (entity-specific)

Water withdrawal intensity of papermills  
(m<sup>3</sup> per tonne produced paper)



In 2024, we observed a 15% decrease in water withdrawal intensity at our paper mills, primarily due to the implementation of new initiatives to improve water efficiency. This significant reduction brings us very close to achieving our target of 6m<sup>3</sup> per tonne gross volume of produced paper at our paper mills. This progress reflects our continued commitment to sustainable water management, with investments in advanced water recycling technologies, process optimisations, and improved monitoring systems playing a crucial role in reducing our overall water footprint.

#### Accounting principles

The gross paper production volume refers to the total weight (in tonnes) of all paper 'mother rolls' (reels) produced by the paper machines in our paper mills.

A mother reel is a continuous sheet of paper generated on a paper or board machine before being further processed.

This production data is captured and reported daily via the Manufacturing Execution System (GreyconMill), which is implemented across all paper production facilities.

# E5

## Resource use and circular economy

### Material impacts, risks and opportunities related to resource use and circular economy, and their interaction with strategy and business model (IRO-1 and SBM-3)

The Double Materiality Assessment conducted in 2024 (for more information on the materiality assessment process, see 'General Information, IRO-1'), resulted in two material risks, one material opportunity, two material negative impacts and three material positive impacts.

We actively engage with local communities to consider the environmental impacts of our sites. For example, at our Oudegem site, we host an annual neighbourhood meeting where we address all environmental aspects, including waste. The impacts on local communities are also addressed as part of the Environmental and Social Impact Assessments for new industrial projects. We also closely monitor legal obligations and consult with the government about waste regulations.

Material topics and (sub-)sub-topic	Material risks / opportunities	Where in value chain	Time horizon
E5 Resource use and circular economy			
Resource inflows	▲ Dependence on regional recycling supply chains		
	▲ Less dependence on the supply chain of virgin resources makes VPK less subject to market price fluctuations of the primary resources		
Resource outflows	▲ The PPWR (Packaging and Packaging Waste Regulation) prioritises the re-use and reduction of packaging materials, along with recycling. This could potentially lead to a decrease in demand and a drop in revenue.		
Material topics and (sub-)sub-topic	Material impacts	Where in value chain	Time horizon
E5 Resource use and circular economy			
Resource inflows	● Paper industry has several resource inputs such as wood pulp, water, energy, chemicals.	+	
	● VPK has FSC® certifications for all its (virgin) wood-based inflows, ensuring responsible forest management.	+	
Resource outflows	○ Any usage of non-circular and/or virgin materials during production process feeds back to climate change.		
	○ Increasing the use of recycled fibres reduces the outflow of virgin fibre in the products.	+	
Waste	○ Paper and cardboard packaging are recyclable and can replace single-use plastics in several applications, decreasing the environmental impact of these applications.		

Material risks/opportunities ▲ risk ▲ opportunity Material impacts ● positive impact ○ potential positive impact ● negative impact ○ potential negative impact  
Value chain ↗ upstream own operations ↘ downstream Time horizon short term medium term long term all time horizons

## Strategic response to material impacts, risks and opportunities

At VPK, we have developed a comprehensive strategy to address the risks and opportunities associated with resource inflows, outflows and waste. Here is an overview of our approach:

- **Resource inflows:** Our strategy focuses on maximising the use of recycled materials. By prioritizing recycled inputs, we reduce dependence on virgin materials, which helps in conserving natural resources and minimizing our environmental footprint. We keep the use of non-renewable materials to a minimum.
- **Resource outflows:** we aim to design products that are fully recyclable, ensuring that the circular cycle can be closed.
- **Waste:** we invest in state-of-the-art recycling technologies to transform waste paper into high-quality recycled paper. By optimizing production processes and reducing waste generation, we minimize the environmental impact and operational costs.

## Financial and business model implications

Advancing the circular economy is at the core of VPK's business model. VPK Group is both recycler and product seller:

- To produce our products, we recycle 1.5 million tonnes of paper and board on a yearly basis. Our value circle starts with more than 98% renewable materials as input, of which the vast majority is paper. We use 100% recycled fibres for our paper solutions, and 90% recycled fibres for packaging solutions. Our sustainable sourcing strategy focuses on sourcing of key raw materials (virgin and recycled paper) in line with FSC® (Forest Stewardship Council®) standards. FSC® certification ensures that the materials used in our products come from well-managed forests, controlled sources or recycled materials.

- We use these raw materials to produce recyclable and protective cardboard packaging solutions and cores. Closed loop recycling is essential for the development of a circular economy. Our priorities are to further promote recycling and reuse and the efficient use of sustainable raw materials.

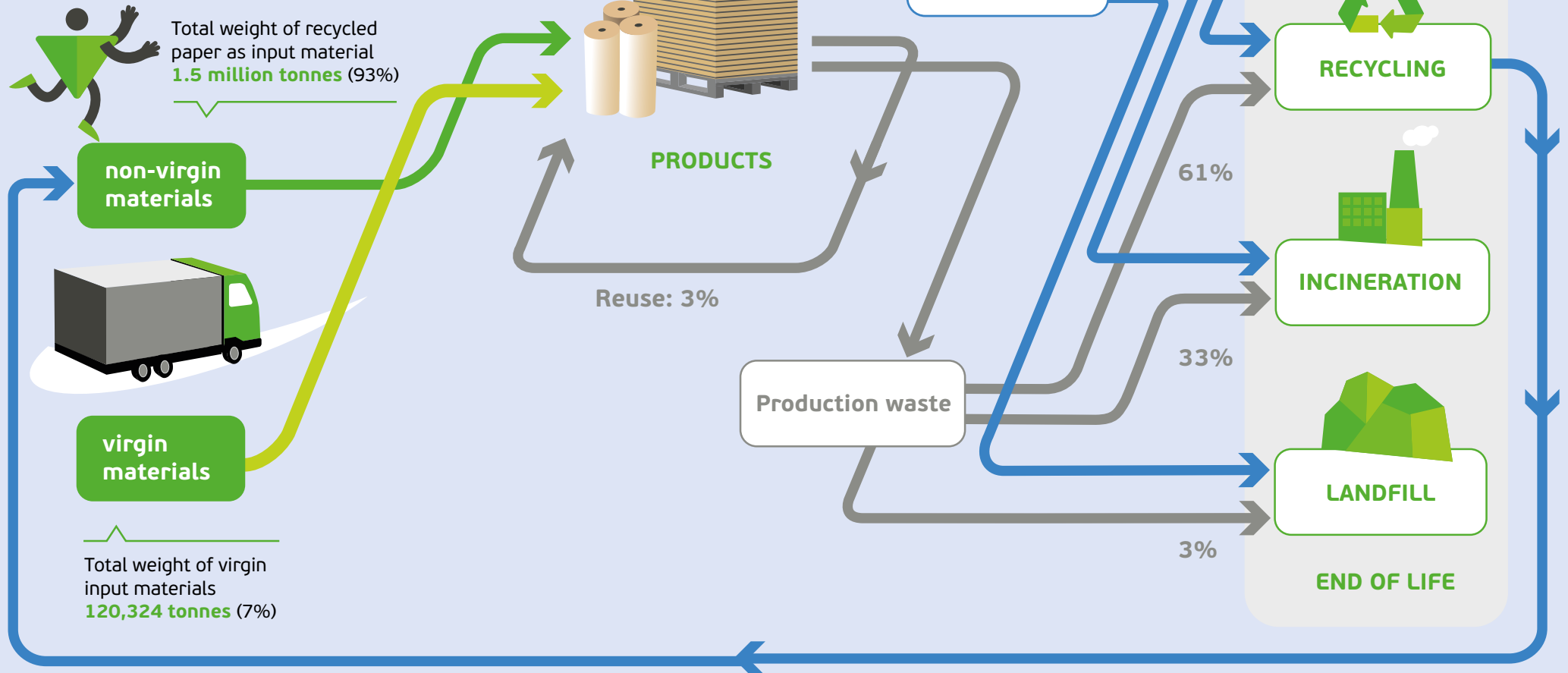
Waste in our own operations is predominantly composed of paper and cardboard, which in the majority of cases is recycled. Recycling of paper and cardboard waste happens partly in our own installations, partly in others. If the paper waste is contaminated with plastics, waxes, glue residues etc. and unfit for recycling, incineration with energy recovery is the second preferred method. This happens predominantly on site. Downstream, our paper-based products follow the same processing methods. Our products become waste at the final consumer stage, either in households or via retail channels. Paper waste is collected and sorted via community collection companies. The sorted fraction that is fit for recycling returns eventually to both our own recycling installations and others. Collected paper is only incinerated if it is heavily contaminated.





## VPK Group's circular business model

**Designed for recycling**  
Rate of recyclable content  
in packaging solutions: **95-99%**





## Policies related to resource use and circular economy (E5-1)

### Environmental policy

**Content:** VPK's [environmental policy](#) addresses the management of material impacts related to circularity and waste. More specifically we commit to:

- working closely with our customers to avoid inefficiencies from the design stage onwards
- making optimal use of our packaging materials, ensuring our packaging is fit-to-size
- using recycled materials as much as possible and looking for renewable alternatives
- avoiding waste in own operations as far as possible, even if it is recyclable
- collecting and recycling our customers' packaging waste

**Scope:** All aspects of VPK's divisions and operations, including manufacturing, transportation, and office facilities.

**Most senior level accountable for implementation:**

Group Environmental manager, reporting to the Sustainability Steering Committee and the Executive Committee

**Third-party standards/initiatives:** N/A

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible on company website; available to all employees, contractors and suppliers

### Supplier code of conduct

We also place expectations regarding responsible resource and waste management on our suppliers, as covered in our [Code of Conduct for Suppliers](#). This outlines strict compliance with sustainable forestry practices and biodiversity conservation as prerequisites for working with VPK Group. All details on the Code of Conduct for Suppliers can be found in section S2, 'Workers in the value chain'. The scope of the policy includes the entire value chain.

### Deforestation and forest degradation free policy

**Content:** VPK's [Deforestation and forest degradation free policy](#) addresses the sustainable sourcing of renewable materials. Our commitments are:

- exclusively sourcing materials through supply chains with verified Chain of Custody certification (For the production of our paper, corrugated boxes and sheets, we only accept materials that are 100% FSC®-certified. All our paper mills utilize recycled CoC-certified fibres.)
- eliminating raw material sourcing from areas with a high risk of deforestation
- complying with the EU Deforestation Regulation once it becomes effective

**Scope:** All aspects of our supply chain.

**Most senior level accountable for implementation:**

Group FSC® Multi-Site Manager and Group Procurement Manager, reporting to the Sustainability Steering Committee and the Executive Committee

**Third-party standards/initiatives:** N/A

**Stakeholder consideration:** internal content experts

**Availability:** Accessible on company website; available to all employees and suppliers.

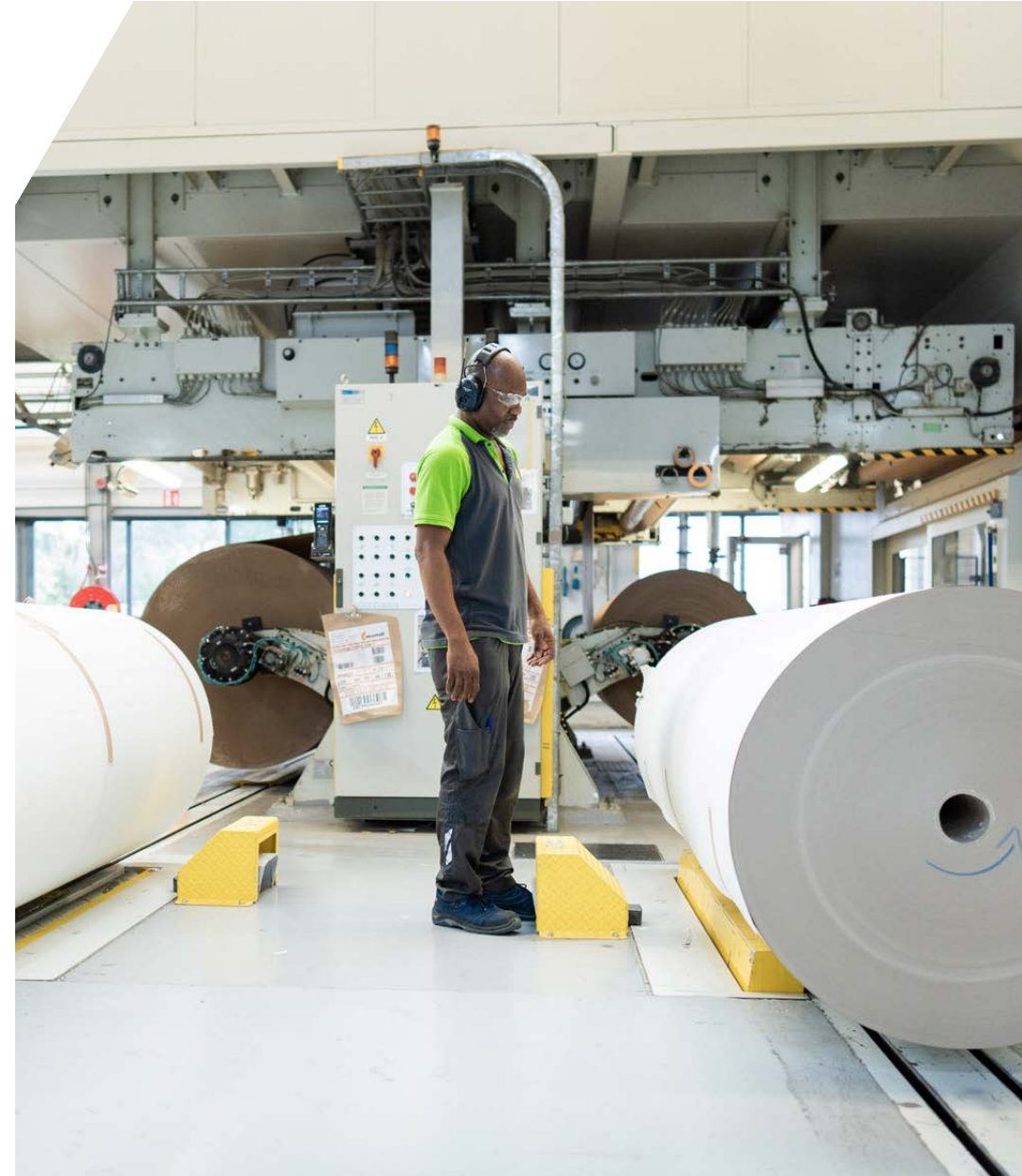
## Targets related to resource use & circular economy (E5-3)

VPK has set the following targets to address its material impacts, risks and opportunities related to resource use and circularity:



- Reduce the amount of waste that is landfilled to 5.3 kg per tonne gross volume of produced paper by 2025.
- Minimize waste generation as far as possible, even if it is recyclable. Therefore, we aim to keep our corrugated recyclable waste at the same level and ideally lower it.
- Ensure that 100% of VPK's paper and at least 85% of packaging materials contain recycled fibres.
- Ensure that 100% of our supply consists of FSC® CoC-certified materials for the production of our paper, corrugated boxes and sheets by 2025.
- Maintain FSC® CoC certification for 100% of paper production sites and at least 90% of packaging sites.
- Achieve a 100% deforestation and forest degradation-free supply chain for VPK's end products by 2025 (as of the cut-off date of December 31, 2020).

These targets are relative and voluntary. They are not based on conclusive scientific evidence.



## Actions related to resource use and circular economy (E5-2)

### Actions taken in 2024

We continuously take measures to prevent, mitigate and remediate actual and potential impacts, and to address risks and opportunities relevant to resource use and circular economy:

- Since 2011, we have obtained Forest Stewardship Council® (FSC®) Chain of Custody (CoC) certification. Today, all our paper mills and solid board production sites are FSC®-certified.
- We avoid the use of non-renewable materials wherever we can. The only non-renewable materials currently used are non-renewable glue (cold melt), inks, strapping bands and plastic foil. All other materials are renewable, including recycled and virgin paper, starch glue and pallets. Of our input materials, 98% are currently renewable.
- We minimize the use of virgin materials. Currently, we only use a limited amount of virgin fibres in the production of corrugated packaging, to match specific customer requirements. We ensure all virgin fibres originate from responsibly managed forests and controlled sources (FSC®-certified).
- We actively work on designing our products so they are suitable for our own recycling installations (e.g. limiting the use of non-recyclable coatings, using renewable inks, investigating alternatives to plastic strapping, limiting the use of plastic wrapping etc.).
- We offer product optimization services to our customers (e.g. reducing packaging materials, optimizing for logistics etc.).

- We organize regular training and awareness programmes across the VPK Group on waste sorting.
- We are also actively working to significantly decrease landfilling of waste by implementing innovative waste management solutions across our sites. One key waste category in this effort is reject waste, which applies specifically to VPK's paper mills. This waste is generated during the paper recycling process and can be quite heterogeneous. Historically, recovered paper used as raw material for paper production contained about 10% contaminants, such as plastics, iron wire, and wood, which were often landfilled. To address this, VPK is introducing waste treatment initiatives to maximize recycling and minimize landfill dependence.
- Besides waste reduction, most paper mills also convert waste into energy. We also use Solid Recovered Fuel (SRF) from separated waste to power on-site steam boilers, reducing our reliance on fossil fuels.

Alongside these ongoing actions, we took these specific actions in 2024:

- VPK made significant progress in preparing for the implementation of the European Deforestation Regulation (EUDR). To stay up to date on industry developments, we maintained close contact with the European Federation of Corrugated Board Manufacturers (FEFCO) and the Confederation of European Paper Industries (CEPI). Additionally, we engaged with IT platform providers to develop automated systems for managing data flows and generating Due Diligence Statement (DSS) numbers, ensuring seamless integration between suppliers, the EU API system, and VPK's own ERP system.

- During 2024, VPK Group conducted a detailed analysis of potential software providers to support the due diligence process and automate DSS number flows. By the end of 2024, we finished the groundwork to ensure all systems will be fully operational by Q4 2025.
- We have successfully integrated a new corrugated site in Italy into the VPK FSC® multi-site certification. This achievement supports our goal of maintaining at least 90% FSC®-certified sites within the packaging division, while ensuring the delivery of sustainable products to our customers.
- At the Papeleira paper mill in Portugal, we have implemented a second press service for reject waste, reducing humidity by 8% and lowering the weight of landfilled waste. Additionally, we conducted several studies and analyses with an external partner to explore the installation of a pyrolysis reactor for gas production, aiming to generate steam through waste-to-energy conversion.
- At the Corex Board Atlantic site, an anaerobic digester (methanizer) is being installed to convert organic process waste (sludge) into biogas, which will substitute natural gas and cut carbon emissions by 10%. More information on this project can be found in section E1, 'Climate change'.

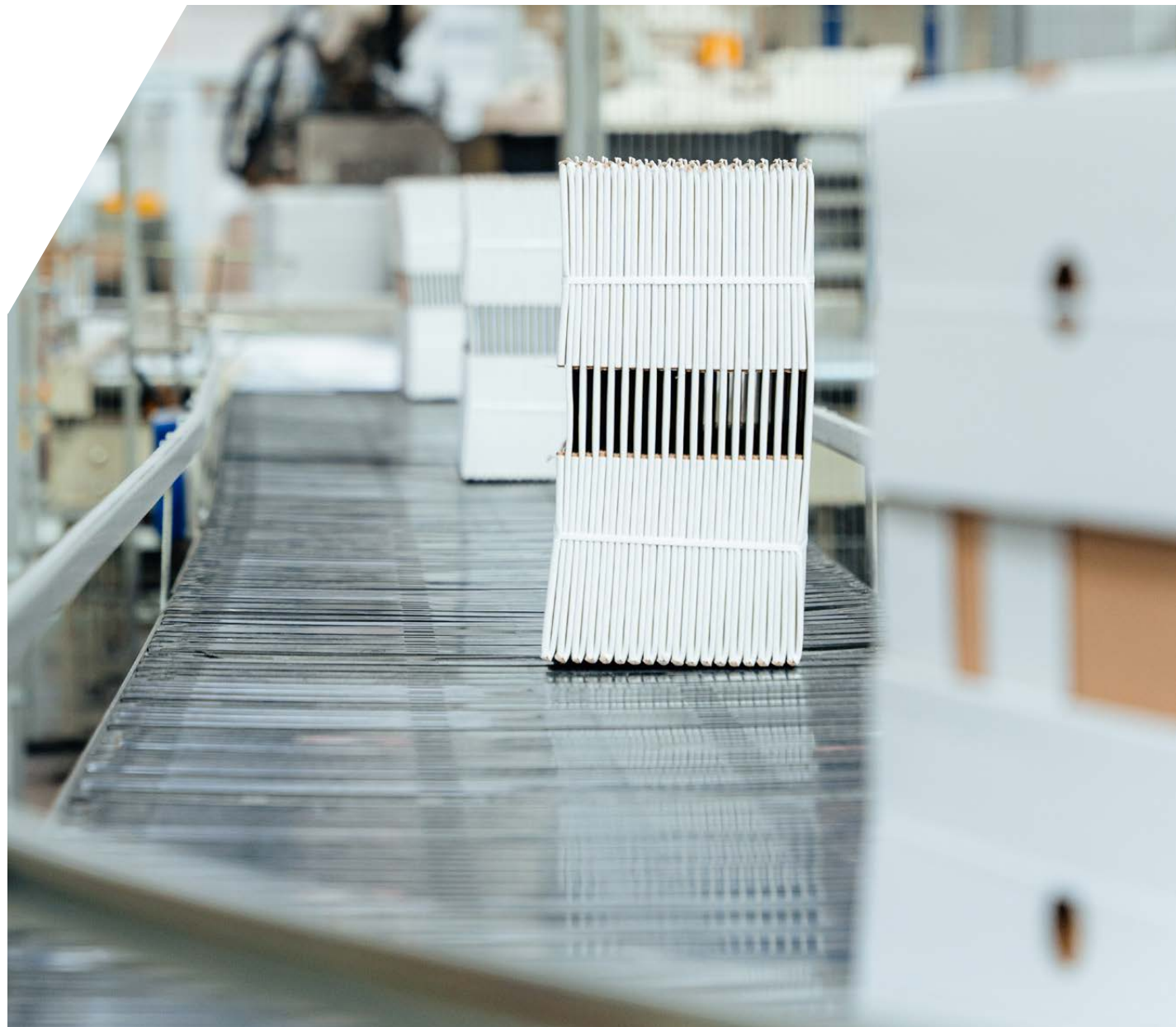
Read more about Corex Board Atlantic's waste recovery process in the case study on page 72.



## 2025 outlook

In order to achieve our targets, we will be implementing various actions in 2025:

- Building on the progress made in 2024, VPK will fully implement the EUDR compliance system in 2025. The automated platform for managing data flows and generating DSS numbers will be integrated across our operations, ensuring seamless connectivity between suppliers, the EU API system, and VPK's ERP system. Throughout the year, we will finalize system testing, onboard all relevant stakeholders, and ensure full compliance with EUDR requirements. Our objective remains to have all systems fully operational by Q4 2025, supporting a smooth and efficient due diligence process across the supply chain.
- Our paper mill in Oudegem has been searching for a more sustainable solution for the bottom ashes from its coal boiler. Traditional use of these ashes as a binder material in applications such as road works is becoming more difficult due to stricter environmental demands, so in 2025 we aim to find a better solution for the disposal of approximately 7,000 tonnes of ashes per year. Moreover, bottom ashes may be completely eliminated in the coming years as the site transitions to an alternative fuel. This will not only contribute to waste reduction but also further lower CO<sub>2</sub> emissions.
- At the Papeleira paper mill, we are seeking a sustainable partner to repurpose reject waste and further reduce landfill disposal. This includes using paper waste as fuel for energy generation (RDF) and repurposing reject waste in the cement industry. Additionally, we are exploring the installation of an RDF production unit with metal recovery capabilities. We are also planning to commence operation of the biomass generator, with the potential to co-burn waste and biomass for steam production.





## Towards zero landfill as Corex Board Atlantic implements full waste recovery

For over 50 years, the Corex Board Atlantic mill near Bordeaux has been transforming recovered paper into coreboard. As part of the VPK Group since 2019, the site has consistently sought ways to improve operational sustainability. Recently the site has achieved a milestone: successfully eliminating the landfilling of its process waste. Through smart investments in waste treatment technology and strategic partnerships, the plant is now recovering value from all residuals, bringing VPK Group's zero-landfill ambition one step closer to reality.

The production of coreboard from recovered paper generates contaminants, such as plastics, metals, and other unwanted materials. Until 2021, around 7,000 tonnes of this waste were landfilled annually. But for Corex Board Atlantic, this was no longer acceptable. 'Landfilling is not a sustainable solution,' says Mill Director Stéphanie Claustres. 'We wanted to find a way to extract

value from all our residuals, including fibres and water trapped in the waste.'

After years of design, testing, and pilot trials, the first treatment line was commissioned in January 2022. The result? A 45% reduction in waste volumes from the pulper's continuous stream and a 3% decrease in the mill's consumption of recovered paper.



## Two waste streams, one circular solution

The project was implemented in two phases. The first addressed the continuous waste flow from the pulping process – about 70% of the site's total waste. This stream now passes through a shredder, magnetic separator and finally a centrifuge. Fibres and water are recovered and reused in the process, while plastics and metals are separated and prepared for external recycling.

Phase two tackled the intermittent waste: compact 'balls' of entangled plastic and wire that had to be manually removed from the pulper every two hours.

These are now shredded in two stages and processed via the same line. Metals are recovered and sent to recyclers, while the remaining fibres and water are reclaimed.

'The results have exceeded expectations,' says Stéphanie. 'Thanks to this system, we have recovered an additional 1,500 tonnes of fibres and eliminated nearly 2,500 tonnes of waste from our process. This is not only a win for the environment, but also for operational efficiency.'

## Valorization through energy recovery

In July 2024, Corex Board Atlantic reached a decisive turning point. The site signed

a contract with Brangeon, a local waste management company, to divert remaining residuals to Solid Recovered Fuel (SRF) applications, eliminating landfilling altogether.

'None of our waste is landfilled anymore,' Stéphanie confirms. 'Instead, we are contributing to energy production. It is a virtuous loop — lower emissions, lower costs, and full alignment with VPK's sustainability strategy.'

## A sound investment in sustainability

The total investment, which was partially subsidized, has delivered tangible returns. The mill now saves nearly two-thirds annually on landfill costs, with modest increases in operating expenses. The return on investment is expected within two years.

Next steps include optimising moisture control in the SRF stream and identifying more valuable end-of-life solutions for the recovered metals. 'There is always room to improve,' says Stéphanie. 'But what matters most is that we are no longer treating our waste as waste. We are treating it as a resource.'

“

What matters most is that we are no longer treating our waste as waste. We are treating it as a resource.

STÉPHANIE CLAUSTRES,  
MILL DIRECTOR,  
COREX BOARD ATLANTIC



## Metrics

### Resource inflows (entity-specific)

Material inputs (in tonnes)				
	2022	2023	2024	% vs. LY*
Renewable materials	2,635,955	2,581,583	2,858,307	11%
Non-renewable materials	44,750	53,076	61,912	17%
Share % of renewable materials	99%	98%	98%	

\* LY: last year

Our renewable materials consist predominantly of recycled/virgin paper, starch glue and pallets. Our non-renewable materials consist predominantly of non-renewable glue (cold melt), inks, strapping bands and plastic foil. We maintain a high standard (98%) of renewable material use in our production and are striving to increase this figure. We continuously explore sustainable alternatives to replace non-renewable materials.

Paper production (raw material inputs)				
	unit	2022	2023	2024
Recycled fibres	Tonnes	1,039,967	1,197,217	1,452,954
Virgin fibres	Tonnes	0	0	0
Recycled fibres	Percentage	100	100	100
FSC® CoC*-reclaimed materials	Percentage	100	100	100

Packaging production (raw material inputs)				
	unit	2022	2023	2024
Recycled fibres	Tonnes	976,663	1,009,500	1,071,829
Virgin fibres	Tonnes	147,164	125,000	117,050
Recycled fibres	Percentage	87	89	90
FSC® CoC*-certified materials	Percentage	100	100	100

\* CoC = Chain of Custody

All our paper mills are FSC®-certified and use 100% recycled Chain of Custody (CoC)-certified fibres. This reflects our commitment to sustainability and responsible sourcing.

Recycling is at the core of our business, and we exclusively use recycled (previously used) paper and cardboard to manufacture our paper products. This approach aligns with our sustainability goals while ensuring high-quality, environmentally responsible production.

Our packaging production demonstrates a strong commitment to sustainability by progressively increasing the use of recycled fibres while reducing reliance on virgin fibres. From 2022 to 2024, the proportion of recycled fibres in our packaging materials has grown from 87% to 90%, reflecting our continuous efforts to enhance circularity in our operations.

Additionally, 100% of the materials used in our packaging production are FSC®-Chain of Custody (CoC)-certified, ensuring responsible sourcing and adherence to the highest sustainability standards. By prioritizing recycled content and minimizing virgin fibre use, we reinforce our dedication to reducing environmental impact while maintaining the quality and performance of our packaging solutions.

#### Accounting principles

Weights of renewable and non-renewable materials are based on purchased volumes (invoices). Weights of recycled and virgin fibres are based on purchased (invoices) and produced volumes. The percentage of FSC®-certified materials is calculated based on purchased FSC®-certified volumes (invoices) in compliance with certification standards. The percentage of recycled content in packaging products is calculated based on purchased invoices and production volumes.



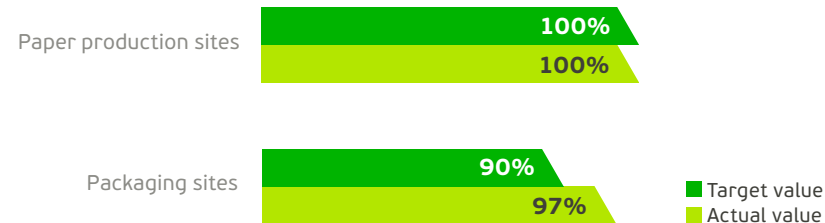
## Metrics

### Resource outflows (E5-5 and entity-specific)

There is currently no industry standard that clarifies circular economy principles for designing our products. Durability, repairability and recyclability are neither legally defined nor standardized yet. We are planning to align our approach with regulations and standards as soon as they become available.

- Durability: while there are currently no industry average metrics or standards in place that determine durability of our products, we are constantly testing the quality and performance of our products.
- Repairability: there is no average metric or standard for repairability in the industry.
- Recyclability: due to the lack of a standardized definition of recyclability, it is not possible to claim recyclability for our products at this time.

#### FSC®-certification of VPK sites in 2024



#### Accounting principles

The percentage of FSC®-certified sites is calculated by dividing the number of FSC®-certified sites by the total number of sites, calculated per division.

For a complete overview of all certified sites, [see page 124](#).



VPK Group has achieved its FSC®-certification targets for two divisions within the group:

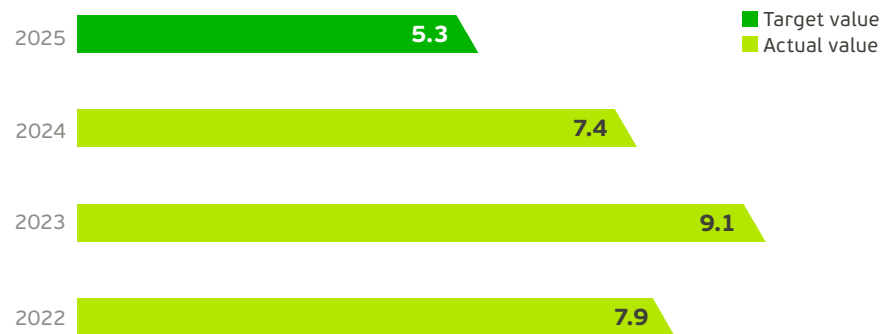
- All seven of our paper mills are FSC®-certified and exclusively use 100% recycled, CoC-certified fibres.
- Additionally, 34 of the 35 packaging sites in the corrugated division are FSC®-certified, representing 97% of all sites.

## Metrics

### Waste (E5-5)

We aim to reduce the amount of waste landfilled to 5.3 kg/tonne of gross volume of produced paper by 2025. The figures show a promising trend, with a significant 19% decrease in landfilled waste from 2023 to 2024. This positive progress highlights our commitment to minimizing waste and achieving our sustainability goals. By continuing to focus on reducing waste and maintaining or lowering the level of corrugated recyclable waste, we are well on our way to meeting our ambitious target.

#### Kg landfilled waste per tonne gross volume of produced paper\*



\* Debris from construction activities (e.g. building conversion) on site is monitored but reported separately.

The increase in waste in absolute tonnes is due to growing production, particularly from the increase in production at Paper Normandie. Additionally, there is some increase in figures because of the different reporting methods for packaging waste (recycled category).

#### Waste in tonnes

	2022	2023	2024	% vs. LY*
Preparation for reuse	15,792	12,125	10,555	-13%
Recycling**	139,920	173,633	211,612	22%
Incineration**	91,476	114,496	115,054	0%
Landfill**	8,594	10,444	10,852	4%
<b>Total waste**</b>	<b>255,783</b>	<b>310,699</b>	<b>348,073</b>	<b>12%</b>

\* LY: last year

\*\* Debris from construction activities (e.g. building conversion) on-site is monitored but reported separately. Infrastructure waste from building conversion was 9,891 tonnes in 2022, 889 tonnes in 2023 and 1,779 tonnes in 2024.

Infrastructure waste from building conversion was 9,891 tonnes in 2022; 889 tonnes in 2023 and 1,779 tonnes in 2024.

#### Accounting principles

Our waste-related data is monitored via different tools, depending on the scale and complexity of the site. These include: the weighing of waste going off site via a weighing bridge, the weighing of waste manually or automatically and reporting it digitally, the collection of data from the waste processing company. Data is monitored via reporting systems or local ledgers.

PART  
4

# Social information





# content

## part 4

Own workforce (S1)

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Workers in the value chain (S2)

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# S1

## Own workforce

### Material impacts, risks and opportunities related to own workforce and interaction with strategy and business model (SBM-3)

VPK's success is founded on its skilled employees and strong teams. We are fundamentally dependent on the expertise that our colleagues embody, combining business knowledge with engineering skills to create industry-leading technology, continuous innovation and decarbonization efforts, supported by market-specific business and commercial strategies.

The Double Materiality Assessment conducted in 2024 identified three material negative impacts and six material positive impacts related to Own workforce. For more information on the materiality assessment process, see General Information, IRO-1.

Material topics and (sub-)sub-topic	Material impacts	Type of worker impacted	Time horizon
<b>S1 Own workforce</b>			
<b>Health and safety</b>	○ All employees could be impacted by working conditions that have a negative effect on their health and/or safety. Specifically, dusty areas could be harmful for employees.	All employees, but particularly employees working in dusty areas	■■■■
	○ Employees working with glue, ink and coatings could experience negative health effects.	Employees working with glue, ink and coatings	■■■■
	● VPK promotes a healthy lifestyle through sports activities and access to sport facilities. Alongside physical health, VPK also offers dedicated training to employees to promote mental health and reduce stress. This increases employee wellbeing.	All employees	■■■■
	● VPK launches group-wide safety awareness campaigns to help team leaders and operators understand and remedy dangerous behaviour in operations. Improving safety and reducing the number of accidents on site will lead to increasing job satisfaction.	All employees	■■■■
<b>Measures against violence and harassment in the workplace</b>	○ Harassment could result in psychological distress, anxiety, depression and other mental health issues among affected employees.	All employees	■■■■
<b>Secure employment</b>	● Employees who are offered job security tend to feel safer, more stable and satisfied and generally happier, as it gives them greater confidence in their future within the company.	All employees with permanent contracts	■■■■
<b>Working time</b>	● Flexible working time arrangements help improve work-life balance, leading to increased job satisfaction, reduced stress and improved overall wellbeing.	All employees	■■■■
<b>Adequate wages</b>	● By offering adequate wages VPK promotes a supportive work environment where employees feel valued and motivated, leading to increased job satisfaction and improved overall wellbeing.	All employees	■■■■
<b>Work-life balance</b>	● Work-life balance measures lead to increased job satisfaction, reduced stress and improved overall wellbeing. This results in a motivated workforce and fewer work-related mental health issues among employees.	All employees	■■■■

Material impacts ● positive impact ○ potential positive impact ● negative impact ○ potential negative impact  
Time horizon ■■■ short term ■■■ medium term ■■■ long term ■■■ all time horizons

VPK's material impacts originate from the group's business model and strategy. The material positive impacts are a result of a proactive approach to people development, which helps in retaining skilled employees. We recognize the importance of having a talented workforce and through our actions we aim to retain skilled employees and top-tier talents who are crucial for implementing the group's business model and strategy and achieving commercial success. These positive impacts are directed towards all own employees but may vary between different locations and countries.

Potential negative health and safety impacts are specifically related to the production environment, where a range of measures are taken to avoid these impacts. We acknowledge that employees working at production sites have a higher likelihood of experiencing safety incidents. Certain sites have been identified as having a higher risk level due to the nature of their operations.

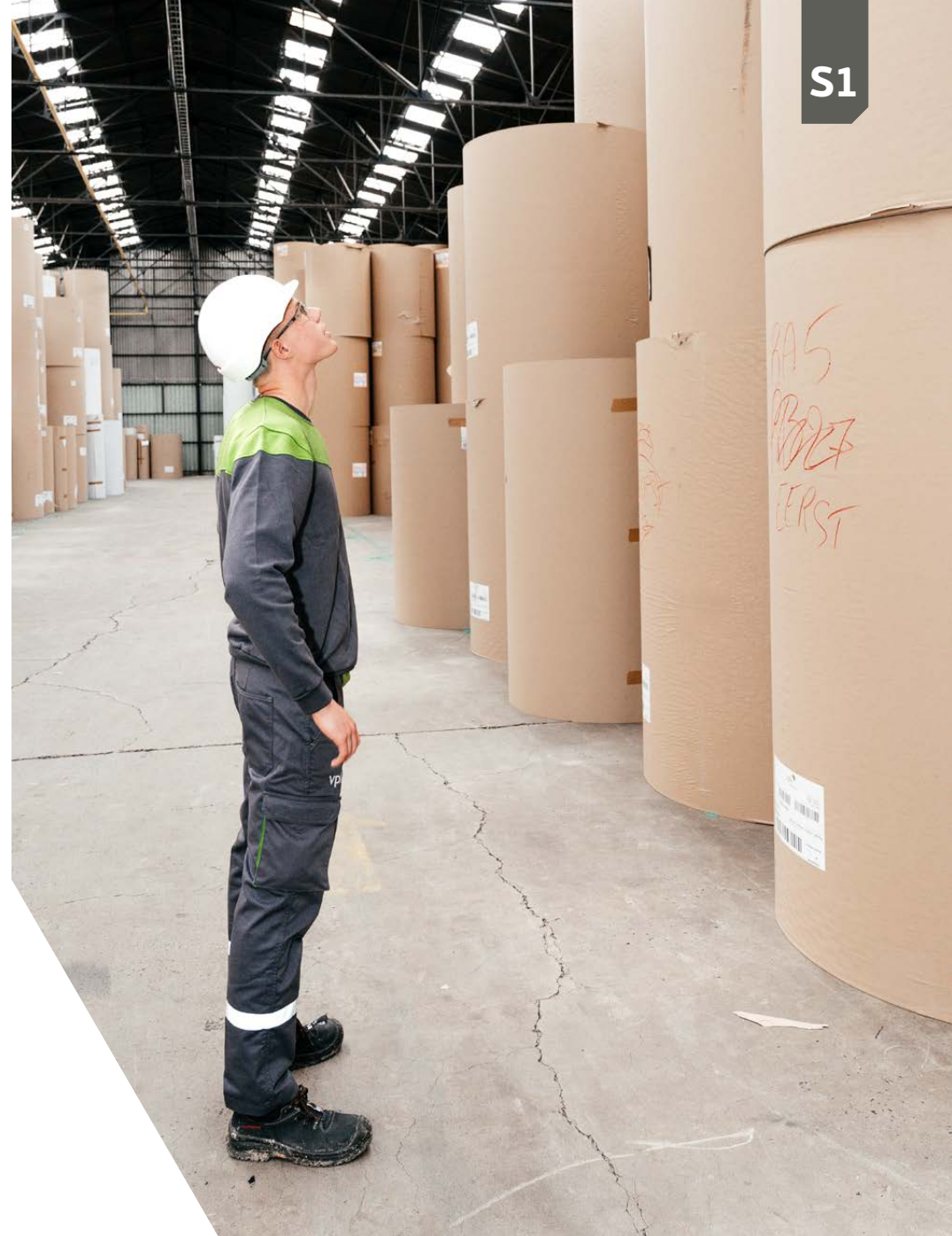
The disclosure on ESRS S1 covers all individuals in our own workforce who could be materially impacted by the Group. This includes employees and non-employees. Non-employees are workers provided by temporary employment agencies and individual contractors supplying labour to VPK (self-employed people).

The material impacts do not arise from transition plans for reducing negative impacts on the environment or achieving greener and climate-neutral operations.

VPK Group has not identified countries or geographic areas within in its own operations with a significant risk of forced, compulsory or child labour.

## Interests and views of stakeholders (SBM-2)

Interests and views of the own workforce inform VPK's strategy and business model. More information can be found in General information, section SBM-2.



## Policies related to own workforce (S1-1)

Our [key policies](#) related to own workforce are

Policy	Addressing these topics:
<b>Health and safety policy</b>	<ul style="list-style-type: none"> <li>• Health and safety</li> </ul>
<b>Human resources policy</b>	<ul style="list-style-type: none"> <li>• Diversity</li> <li>• Training and skills development</li> <li>• Adequate wages</li> <li>• Secure employment</li> </ul>
<b>Code of Conduct</b>	<ul style="list-style-type: none"> <li>• Health and safety</li> <li>• Freedom of association and collective bargaining</li> <li>• Measures against violence and harassment in the workplace</li> <li>• Child labour</li> <li>• Forced labour</li> <li>• Privacy</li> </ul>
<b>Diversity, equity and inclusion policy</b>	<ul style="list-style-type: none"> <li>• Gender equality and equal pay for work of equal value</li> <li>• Diversity</li> <li>• Training and skills development</li> <li>• Employment and inclusion of persons with disabilities</li> </ul>
<b>Human rights policy</b>	<ul style="list-style-type: none"> <li>• Child labour</li> <li>• Forced labour</li> <li>• Privacy</li> <li>• Trafficking in human beings</li> </ul>
<b>Policy statement – Compliance with FSC® Core Labour Requirements</b>	<ul style="list-style-type: none"> <li>• Child labour</li> <li>• Forced labour</li> <li>• Discrimination</li> <li>• Freedom of association and collective bargaining</li> </ul>
<b>Privacy and data protection policy</b>	<ul style="list-style-type: none"> <li>• Privacy</li> </ul>

### Health and safety policy

**Content:** This [policy](#) guides all entities on how to create a safe working environment and prevent, mitigate, manage workplace safety risks and ensure regulatory compliance. It focuses on the Six Steps for Safety (see later).

**Scope:** All employees, non-employees and external contractors

**Most senior level accountable for implementation:** Group safety manager, reporting to the Safety Steering Committee and the Executive Committee

**Third-party standards/ initiatives:** N/A

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible via company website; available to all employees and contractors

### Human resources policy

**Content:** This [policy](#) includes commitments to fair remuneration, training and skills development and a respectful and safe working environment, where attention is also paid to the wellbeing of every employee.

**Scope:** All employees

**Most senior level accountable for implementation:** HR and legal department, reporting to the Sustainability Steering Committee and the Executive Committee.

**Third-party standards/ initiatives:** N/A

**Stakeholder consideration:** Internal content experts, Works Council, Union representatives

**Availability:** Accessible via company website; available to all employees

### Code of Conduct

**Content:** A detailed explanation of VPK's [Code of Conduct](#) can be found in Governance information. Specifically related to own workforce topics, the Code of Conduct expects all employees to act with integrity and provides clear standards on issues such as health and safety; discrimination and harassment; freedom of association; the right to collective bargaining; forced, compulsory and child labour; and whistleblowing. Employees can report violations via whistleblowing channels.

**Scope:** All employees

**Most senior level accountable for implementation:** Legal department reporting to the Executive Committee

**Third-party standards/ initiatives:** The UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Conventions and the ten principles of the United Nations Global Compact, as well as local legislation when applicable

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible via company website; available to all employees.



### Diversity, equity and inclusion policy

**Content:** The objective of the [policy](#) is to foster an inclusive culture where everyone feels respected and empowered, ensure equal opportunities for career development and address any form of discrimination. This includes age, gender, race, colour, disability, religion, sexual orientation, political opinion, social origin, or other.

**Scope:** People in own operations and value chain

**Most senior level accountable for implementation:** HR and legal department, reporting to the Sustainability Steering Committee and the Executive Committee

**Third-party standards/ initiatives:** N/A

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible via company website; available to all employees

### Human rights policy

**Content:** This [policy](#) focuses specifically on respecting all internationally recognized human rights, including labour rights of employees.

**Scope:** People in own operations and value chain

**Most senior level accountable for implementation:** HR and legal department, reporting to the Sustainability Steering Committee and the Executive Committee.

**Third-party standards/ initiatives:** The Universal Declaration of Human Rights, The ten principles of the UN Global Compact and the United Nations Guiding Principles on Business and Human Rights (UNGPs), The International Labour Organization (ILO) Declaration on the Fundamental Principles and Rights at Work, The OECD Guidelines for Multinational Enterprises.

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible via company website; available to all people in own operations and the value chain

### Policy statement – Compliance with FSC® Core Labor Requirements

**Content:** In this [statement](#) VPK Group sets out its commitment to complying with the FSC® core labour requirements, as published in FSC-STD-40-004 V3-1. The core labour requirements, as declared by the FSC®, represent the minimum requirements for work, from an ethical and moral point of view.

**Scope:** VPK Group and all FSC®-certified subsidiaries

**Most senior level accountable for implementation:** General management and HR department, reporting to the Sustainability Steering Committee and the Executive Committee.

**Third-party standards/ initiatives:** FSC® core labour requirements, as published in FSC-STD-40-004 V3-1

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible via company website

### Privacy and data protection policy

**Content:** In this [policy](#) VPK Group sets out its commitment to complying with the European General Data Protection Regulation (“GDPR”) and other legislations regarding the processing of data.

**Scope:** Employees, job applicants, customers and suppliers

**Most senior level accountable for implementation:** Data Protection Officer

**Third-party standards/ initiatives:** N/A

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible via company website



## Processes for engaging with own workers and workers' representatives about impacts (S1-2)

### General engagement with own workforce

All employees and teams at VPK are free to discuss any matter or material impacts and take steps to address areas of concern through relevant communication channels. We have established the following engagement methods to gain perspectives from employees on issues important to them while fostering an environment of respect. The resources associated with the different engagement activities are not centrally measured.

**HR Business Partners (HRBPs):** HRBPs serve as a crucial global and local point of contact for all employees, ensuring open, ongoing and accessible communication channels across the organization. HRBPs engage directly with employees to understand their perspectives and address any concerns or material impacts they experience. By maintaining this close connection with the workforce, HRBPs provide insights that inform VPK's decisions and actions, enabling a responsive and supportive work environment. They also play a pivotal role in implementing local actions based on employee feedback gathered through ongoing engagement initiatives and regular interactions. This approach ensures that employee perspectives are integrated into VPK's overall strategy and management activities, fostering a culture of trust and collaboration.

**Participants:** All employees (engagement at local level)

**Type of engagement:** Participation

**Frequency of the engagement:** Ongoing.

**Most senior role responsible:** Local HR and local management, managing directors or business unit managers

### Surveys

We conduct employee engagement surveys, which explore different aspects of employee wellbeing: work content, working conditions, working atmosphere, work organization and labour standards. The overall outcome of the survey and subsequent action plan is presented to the local management. The responsibility of taking action based on survey results lies with local HR. Action guides and available support and training materials are created to plan dedicated, feedback-based actions.

**Participants:** All employees

**Type of engagement:** Consultation

**Frequency of the engagement:** At least every five years.

Our annual target is to conduct a survey in at least 15 of our sites (see section S1-5 Targets).

**Most senior role responsible:** Local HR management

### Town hall meetings

Our town hall meetings provide global business and financial updates as well as opportunities for employee-related topics and announcements. Employees can submit questions to the leadership in person at the meeting. The leadership provides answers during the meeting. All employees are invited to the town hall meetings via their company email address or by information spread by the supervisors. The questions and concerns raised by employees provide insights and inform our decision-

making on communication strategies, policy changes, reprioritization initiatives, or the need for leadership action.

**Participants:** Executive management, local management and employees

**Type of engagement:** Information

**Frequency of the engagement:** Biannually or quarterly, depending on the site

**Most senior role responsible:** CEO

### Engagement through works councils and health and safety committees

In Europe, our employee engagement process for working conditions includes a European Works Council and local works councils. Workers' rights are addressed through regular meetings with works councils and local employee representative groups, following local practices and laws. The evolutions of VPK as a group are discussed, information about changes is transmitted. On a country level, working conditions, health & safety, remuneration issues, training and development are topics on the agenda. Specific topics are discussed when needed.

**Participants:** Executive Committee, senior management, HR BP's, official workers' representatives

**Type of engagement:** Participation

**Frequency of the engagement:** Depending on local legislation. Some meetings take place on a monthly basis, some every six weeks and some four times a year. Meetings on specific topics can be ad hoc.

**The most senior role responsible:** Local HR and local management, managing directors or business unit managers

### Engagement through working groups and employee participation

Employees are actively involved in working groups to improve processes (e.g. LEAN proposals, safety). This leads to higher involvement, safer behaviour and cost savings. Multiple countries have informal meetings where people discuss how life at VPK can be made better, healthier and more enjoyable. To give everybody the opportunity to participate, several countries and sites use 'idea boxes' to gain an impression of what life is like on the production floor.

**Participants:** All employees

**Type of engagement:** Participation

**Frequency of the engagement:** Continuous

**The most senior role responsible:** Local management



## Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)

### Approach to remediation

All whistleblowing reports are handled independently and impartially by the legal department at VPK Group NV, the parent company of the VPK Group, to protect the confidentiality of the person filing the report and to ensure adequate follow-up and investigation. The purpose of investigations is to gather facts to determine whether the concern is substantiated and if so, what actions need to be taken. All employees are expected to cooperate fully with investigations. Typically, after reporting a concern, the reporter receives an acknowledgement of receipt within seven days and may also be notified once the investigation is complete. Details of the outcome are usually not shared in order to protect the confidentiality of the investigation and respect the privacy of the people involved. If the concern is substantiated, a decision will be taken regarding what, if any, remediation measures are needed. Measures might include process and control improvements, awareness-raising, training, coaching and disciplinary measures ranging from issuance of a warning to termination of employment.

### Channels for raising concerns

Multiple channels are available to enable employees and external parties to raise questions and concerns rapidly, efficiently, in confidence and without fear of retaliation. We encourage employees to report concerns through any channel that is comfortable for them. The channels available to all employees, regardless of their position or location, are:

- Supervisor
- HR business partner
- Legal department
- Works council — established where legally required
- A whistleblowing service (by email, by phone or anonymously through the form on the VPK website)

These reporting channels are made known to the employees during onboarding and are accessible through the company's intranet.

More information on the whistleblowing system is available in Section G1, 'Business conduct'.

### Tracking and monitoring effectiveness

The whistleblowing framework is managed and monitored by the legal department at VPK Group NV. The legal department oversees the effective implementation and application of the whistleblowing framework.

### Protection against retaliation

VPK welcomes concerns being raised in good faith, even if they end up being unfounded after investigation. We do not tolerate retaliation or attempted retaliation against any person who in good faith reports suspected wrongdoing or participates in an investigation of such wrongdoing. VPK also strongly opposes any attempt to prevent a whistleblower from reporting a suspected wrongdoing. When a whistleblower reports a suspected violation of law covered by the applicable national whistleblowing legislation (rather than a suspected breach of an ethical code), then legal protection against retaliation applies.

## Targets related to own workforce (S1-5)

We have set the following targets:



### Health and safety:

- Every year we achieve a Hazard and Near Miss Close Out Rate per site of 85%
- Our target for next year is to keep the Lost Time Injury Rate below 6.5.



### Employee wellbeing:

- Every year 95% of our contracts are permanent contracts
- Each year, 100% of our employees will receive at least the minimum wage applicable in their country or region.
- Every year we conduct an employee engagement survey in at least 15 of our sites
- By the end of 2026 90% of VPK Group's employees\* will have undergone mandatory training on the Code of Conduct and whistleblowing system



### Training and education:

Every year, at least 20 hours of training and education is offered per fulltime equivalent employee

\* Employees with a VPK email address

These targets include all employees worldwide (and non-employee workers and value chain workers in the case of safety targets) and are developed based on ongoing feedback from different teams within VPK before being approved and endorsed by the Sustainability Steering Committee and the Executive Committee.

## Actions related to own workforce (S1-4)

### Health and safety

The health and safety of our workforce is one of our top priorities. The VPK group believes that 'No job is so important that it can't be done safely'. That is why we create a strong safety culture at all levels of our organization. All co-workers, at all sites and in all positions, are responsible for achieving our safety goals. All members of our hierarchy commit themselves to providing the required resources and ensuring clear information, instructions, training and supervision at all VPK facilities. In addition, we expect all managers and supervisors to promote safe behaviour among their team members and report any unsafe behaviour or situations. We stress the importance of reporting all accidents and incidents throughout our organization using our safety management systems, so that we can evaluate our progress towards a safer working environment. The safety steering committee, consisting of two Executive Committee members, namely the Head of Specialties division and Head of Paper division, together with the Group Health and Safety Manager, Industrial Director and CTO VPK Packaging Group, is responsible for upholding our commitment to health and safety. See section ESRS 2 GOV-3 for more information on the safety steering committee.







## HEALTH AND SAFETY MANAGEMENT SYSTEM

All factories within the VPK Group are committed to ensuring that they are a safe place to work. Each factory site has to comply or be working towards compliance with the Six Steps for Safety strategy as discussed above. This safety strategy:

- ensures that the company meets its moral obligation to our employees, visitors and contractors to ensure their health, safety and welfare
- helps to prevent breaches of health and safety legislation
- helps to prevent unnecessary costs associated with accidents and incidents

The scope of our health and safety management system covers all our employees and other workers who perform work in sites controlled by VPK. Some of our sites have implemented an occupational health and safety management system, compliant with ISO 45001 (please see the full list on [p. 124](#) of this report).

Hazard identification, risk assessment and incident investigation are the foundations of our health and safety management system. This is done on various levels throughout the organization.

- Machinery risk assessments are performed on individual machines. Existing machines are reevaluated periodically and new machines are evaluated upon acquisition. Specific machinery guidelines exist to carry out this evaluation. Validation is undertaken by the group safety manager or external machinery safety experts.
- Site risk assessments are performed at a site level and address the tasks performed there, considering human aspects, organizational aspects, the product and the environment. This is part of the continuous safety management of the sites and can be delegated to management. Trained safety officers ensure the adequacy of these assessments. Risks are evaluated to distinguish on a scale between severe and low priority risks. This prioritization of risks determines yearly action plans, which aim to resolve risks following the hierarchy of controls (elimination, substitution, guarding, personal protective equipment, organization, correction, safety signage). The result is a low residual risk. Risk assessments are reviewed when there are any changes

to a work situation, when there has been an incident or accident and at least annually to check for changes or additional hazards. Actual reported and observed hazards, which have not yet been considered in the risk assessment, can also be included to reevaluate priorities.

Internal risk analysis has identified the following hazards with possible high-consequence injuries:

- Working at height
- Working on electrical equipment
- Contact with moving machinery
- Workplace transport

### ACTIONS TAKEN IN 2024

We take measures to improve health and safety at the workplace continuously:

- Health and safety training and awareness: we regularly train leaders and line management to manage safety throughout their sites and complete annual safety refresher trainings with operators to maintain safety awareness. We also provide safety training videos in multiple languages to raise safety awareness at all sites. Each worker receives adequate training, so he or she can perform his job safely. This is supplemented with periodic generic training, evacuation practices and first aid training for dedicated employees.

Specific employees perform tasks which entail higher risks and thus receive dedicated training. More specifically, this includes maintenance personnel who are required to work on electrical devices, welding stations and so on.

- Members of the hierarchical line are advised by dedicated safety officers who have received appropriate training, depending on the scale and complexity of their operation(s). The safety officers serve as the leading experts in the implementation of the health and safety management system, the identification of hazards and the guiding of the risk assessments and incident investigation.
- Our operations have dedicated safety committees, which are represented by members of the hierarchy, employee representatives and the safety officer. The committee meets on a regular basis either monthly or every two months and discusses the development of the yearly action plan, accidents that have happened since the last committee, possible safety improvements from the employees and the evaluation of the safety management system.
- We conduct safety audits throughout the group to ensure the Six Steps for Safety strategy is embraced and implemented. Audits also include machinery safety audits.

- All employees of VPK Group are encouraged to report hazards and near misses to their immediate line manager who will record them on our mobile app, 'Zero Accidents'. This information is immediately sent to our internal incident reporting system. This report will be emailed to the responsible person delegated to complete the action in a timely manner. This proactive monitoring tool helps capture potential issues before they become accidents. If an employee fears reprisal for reporting a given hazard, the employee can report this specific hazard via the whistleblowing procedure.
- We monitor our safety performance using KPIs such as number of reported hazards and near-misses, Lost Time Accidents (LTAs) and Lost Time Injury Rate (LTIR).
- Incidents and accidents are reported and analysed on a structural basis with a root cause analysis, in order to correctly identify all associated risks and possible causes. The root causes are the basis on which to act to determine corrective and preventive actions.
- We have external company physicians who are the first point of contact in the event of concerns regarding employee health.
- Furthermore, a healthy lifestyle is actively promoted via internal sports activities and access to external sports facilities. Dedicated training to promote mental health and reduce stress is open to voluntary participation. Some countries are starting to run healthy living workshops. Others offer initiatives such as supporting people to stop smoking, encouraging people to use the stairs instead of the lift, introducing buddies for mental or physical health support and organising walking or moving challenges. Finally, in the Nordic region a full employee programme has been rolled out with onsite gym courses, including gym memberships.

- Within the safety committee we regularly conduct a number of surveys about working conditions and if possible, we adapt the workplace.
- We offer flu vaccinations in various countries.

Alongside these continuous actions, we launched an internal safety awareness campaign in 2024, focusing

on hand safety, called 'It's in your hands'. All divisions were included in the campaign. Hand and finger injuries accounted for 34% of all accidents across the group in 2023. In fact, this had been the main injury type since 2020. We know these types of injuries are preventable accidents, and prevention starts with awareness and being able to recognize job hazards.

**880 accidents and injuries in 3 years related to hands and fingers.**

**Don't be another statistic.**

- » Train before you begin
- » Stop and isolate machines before starting any intervention
- » Wear required personal protective equipment
- » Check your tools
- » Read safety instructions carefully

**It's in your hands**  
#BeAware

We formed a dedicated project team including local safety managers, the marketing team and representatives from all divisions including local management and site operators in order to develop the campaign. We focused on five main hand safety topics:

1. Preventing contact with moving machinery.
2. Preventing contact with sharp objects.
3. Preventing impact injuries from fixed objects or while using hand tools.
4. Preventing contact with or exposure to hot surfaces.
5. Preventing exposure to hazardous substances.

We created an extensive communication toolkit, translated into local languages, including:

- Five videos covering the hand safety focus areas.
- Printed and digital posters.
- Leaflets showing good hand safety practices.
- A campaign website to engage with our audience.

In 2024 all sites were asked to develop their health and safety action plans, covering topics including: completing and reviewing risk assessments at their sites, completing hazard and near miss reporting with the target of closing out 85% of the issues (see section S1-5, Targets).

## 2025 OUTLOOK

As a minimum, all sites will complete risk assessment reviews to make sure they have adequate safety control measures in place to eliminate hazards or to eliminate hazards or reduce the associated risk to an acceptably low level.

Our main accident trend in 2024 was slips, trips and falls. This accident trend equates to 18% of all accidents. This safety issue will be a focus for our 2025 safety campaign that is likely to run from September. All sites were asked to utilize the guidance within our group safety and health platform to help prevent slip, trip and falling hazards within their sites.

Our main injury trend is injuries to hands and fingers, which equates to 33% of all injuries. This has not decreased and still needs continued focus throughout 2025. All sites will continue to use the hand safety campaign material (videos, posters and leaflets) that is located within the group SharePoint platform to continue to raise hand safety awareness across our sites.







## Employee wellbeing

The wellbeing of our employees is a vital ingredient for our business success. We are convinced that when our people feel appreciated for their work, they will go the extra mile for us and support our smart and sustainable growth ambition.

Therefore, we have implemented various measures to nurture the wellbeing of the entire VPK workforce across multiple areas, including:

- Long-term stable employment
- Fair and equal remuneration
- A good work-life balance
- Working time management

### ACTIONS TAKEN IN 2024

We continuously take measures to foster a supportive work environment and prioritize employee wellbeing:

- Our remuneration policy takes sectoral and collective labour agreements as its foundation. Where possible, we aim to exceed these requirements this with company-specific agreements, preferably concluded with the employees' elected trade union representatives. We pay attention to the fact that our remuneration policy contributes to a comfortable way of life for our individual employees. We ensure that every employee is paid at least the local minimum wage level.

Alongside these continuous actions, we took the following actions in 2024:

- We have increased the percentage of permanent contracts from 93% to 94% and are now close to our target of 95%.
- We have conducted employee engagement surveys at 20 sites, exceeding our target of 15.
- At the end of 2024 we had our first collective meeting of all HR managers from various countries. This HR community meeting was established to learn from each other and develop best practices. In the future it will be the forum where global HR projects will be decided and rolled out.

### 2025 OUTLOOK

In 2025, the HR community will lay important groundwork for the development of a comprehensive wellbeing action plan, scheduled for rollout in 2026. A key step in this process is the preparation and coordination of a global employee engagement survey, with the first wave of responses anticipated at the end of 2025 and continuing into spring 2026. This global survey will provide valuable insights into the experiences and expectations of employees across different countries, enabling us to identify cross-national trends and tailor our wellbeing strategy accordingly.

To support this initiative, local HR managers will come together in autumn 2025 for an HR community meeting to align priorities, share best practices and shape a unified approach that reflects both global coherence and local relevance. This collaborative effort will mark a significant milestone in our ongoing commitment to employee wellbeing.

## Training and education

VPK's entrepreneurial spirit is in every fibre of our company. All around the world, our people are given full responsibility and trust to run our business as if it was their own. To live up to this commitment, we want to make sure all our colleagues have the appropriate competencies to fulfil that role.

That is why we continuously invest in their learning, helping them to develop their skillsets and expertise so that they can excel in their job and advance their career at VPK. The training and development of our employees enables us to excel as a company and continue to differentiate ourselves positively from our competitors.

### ACTIONS TAKEN IN 2024

We continuously take measures on training and skills development:

- At onboarding, we make sure people get the right training and support to learn the skills needed for their role.
- Every year, we identify the learning and development needs of our employees and develop a training calendar based on performance reviews and talent management exercises.
- We also invest in various safety training courses to ensure everyone understands the different safety policies and rules.
- Specifically for emerging talent, VPK offers the 'Future Leaders Program', a training programme developed in close collaboration with the Vlerick Business School. This helps develop VPK's future leaders, build a cohesive network within VPK Group across countries and business units, teach strategic thinking, vision development and change management and support succession planning as part of our broader talent management exercise. Since its inception in 2021, 47 colleagues have participated in this programme.

Alongside these continuous actions, we also took these specific actions in 2024:

- Employees received on average 23 hours of training in 2024, so we reached the 2025 target of at least 20 hours of training per fulltime equivalent employee per year.
- The Executive Committee decided to enhance the way training initiatives are measured across the group. As part of this effort, Belgium has begun implementing a Learning Management System (LMS), which will serve as the new standard. Countries currently using Excel or other systems will be encouraged to transition to this unified platform to ensure consistency and efficiency in training management.

Read the case article on our future-ready learning ecosystem on page 93.



### 2025 OUTLOOK

The LMS system will be further rolled out to support training initiatives, with the UK and Ireland to follow Belgium. The Nordics (Denmark, Norway & Sweden) will also take the next step.

In addition, a Learning and Development (L&D) vision is being implemented across VPK, led by management and supported by learning partners in the development of training programmes and e-learning modules. Together with local Learning and Development Officers, this initiative aims to foster a strong learning culture throughout VPK Group.

## Diversity, equity and inclusion

At VPK Group, we are committed to creating an inclusive work environment. We value diversity and encourage all applicants to VPK, regardless of background, gender, age, sexual orientation, religion, nationality or physical ability. Our organization strives to create a workplace where everyone feels welcome, respected and valued.

### ACTIONS TAKEN IN 2024 AND 2025 OUTLOOK

We continuously take measures to foster an inclusive workplace:

- We invest in the ongoing training and development of our employees, with a specific focus on diversity, equity and inclusion (DEI) principles. This includes training on unconscious bias, cultural competence and inclusive leadership.
- We are transparent about our goals and progress regarding diversity, equity and inclusion. This includes systematic reporting and updates to all employees on our diversity and inclusion failures and achievements.

Alongside these continuous actions, in 2024 we organized workshops in several countries to raise awareness and help employees to understand why DEI is important and what the benefits of an inclusive environment are. These projects will be continued in 2025.



## Empowering every employee to grow: building a future-ready learning ecosystem

At VPK Group, learning is no longer a nice-to-have — it's a strategic driver. With the rollout of a new Learning Management System (LMS) and e-learning creation platform, we are laying the foundation for a learning ecosystem that is scalable, inclusive, and aligned with the long-term needs of our industry. But what triggered this shift — and why now? The answer lies in a simple insight: when people grow, organizations move forward.

Our Learning & Development (L&D) strategy is built around that vision. By enabling our colleagues to make quick, independent and well-informed decisions, we strengthen our ability to respond to future challenges. Our L&D team aims to empower employees, improve knowledge transfer and create lasting partnerships that generate shared value.

### Addressing learning needs and system gaps

In 2024, Heidi Lenaerts joined VPK as Learning & Development Project Manager. Her first task: assess how learning was organized across the various business units in Belgium. 'We interviewed over 40 stakeholders across the organization,' Heidi explains, 'and it became clear that although learning was happening, we lacked a central system to manage it.'

There was no reliable way to track who had received which training, especially for business performance and compliance topics. Personal development was also fragmented, and with an ageing workforce, the need for structured knowledge sharing became urgent.

### Choosing the right platform for all employees

We had previously implemented Cornerstone, primarily as an administrative tool to manage training planning and certifications. But its potential was largely untapped. 'We benchmarked various solutions but ultimately decided to re-implement Cornerstone with a simplified setup tailored to our business,' Heidi says. Preparations for the system's technical setup started in the summer of 2024 and were completed by the end of February 2025, including integration with the compensation and benefits system. This was followed by a phased go-live rollout, first to managers and administrative staff and then to shopfloor workers across business units.

### Empowering employees and managers

The new LMS offers all employees a personalized training overview, showing which courses they need to take, when they are due and what they have already completed. Employees can also sign up for new courses, request external training and

access their certificates. Managers benefit from dashboards and reporting that allow them to track team progress, schedule certifications and integrate learning into performance conversations. 'Thanks to our Learning Management System, we have shifted from reactive training to proactive ownership,' says Heidi.

### Building a local learning network

To ensure the success of the system across such a diverse organization, we introduced the role of learning partners. As Heidi explains, 'The learning partners act as a bridge between HR and the business, supporting local implementation and ensuring learning needs are met on the ground. They also assist managers in assigning and monitoring training.' In total, around 20 learning partners were selected across various business units, representing different domains such as production, QESH, IT, legal and sustainability.

Each learning partner acts as a local key user, supporting everything from identifying employee learning needs to helping managers with tasks like coordinating the creation of internal training, handling registrations and follow-up and assisting with reporting. They work in close collaboration with the central HR and L&D teams, ensuring consistency while remaining close to the operational context of their site or BU.

### Expanding with e-learning

In parallel, we also introduced FlowSparks, a tool that enables us to develop e-learning content tailored to specific teams. From onboarding to safety campaigns, e-learning modules are now created in-house, published in Cornerstone and updated regularly. 'It's a scalable way to keep content relevant while reducing dependency on external providers,' Heidi notes.

### Accessible for everyone

Accessibility was a key focus from the start. For production workers, who often lack daily computer access, we installed kiosks at key locations to ensure everyone could interact with the platform. 'If we want learning to be inclusive, digital access is non-negotiable,' Heidi stresses.

### Scaling up across the Group

The rollout in Belgium is already showing results: all office employees have used the system at least once. Deployment to shopfloor workers is still ongoing. The UK and Ireland have confirmed they will adopt the platform next, with Poland and the Nordics following closely. The long-term ambition? A full-fledged VPK Academy acting as a centre of excellence for learning across the Group. 'We have only just begun,' says Heidi. 'But the foundation is strong, and we are building it to last.'

“

Thanks to our Learning Management System, we have shifted from reactive training to proactive ownership.

HEIDI LENAERTS,  
LEARNING & DEVELOPMENT  
PROJECT MANAGER,  
VPK GROUP



## Metrics

### Employee characteristics (S1-6)

#### Number of employees

Head counter by gender			
	2022	2023	2024
Male employees	5,377	5,824	5,859
Female employees	1,067	1,179	1,221
<b>Total employees (permanent &amp; temporary)</b>	<b>6,444</b>	<b>7,003</b>	<b>7,080</b>

Head counter by country			
	2022	2023	2024
BE	1,282	1,210	1,231
CN	250	222	216
CZ	44	38	39
DE	84	107	136
DK	146	139	118
ES	72	154	157
FI	148	141	136
FR	1,329	1,582	1,563
GB	958	947	946
IE	90	98	97
IT	0	110	225
LU	31	31	31
NL	535	535	539
NO	234	228	232
PL	579	625	585
PT	0	165	164
RO	275	278	279
SE	286	285	283
TR	102	109	103
<b>Total employees (permanent + temporary)</b>	<b>6,444</b>	<b>7,003</b>	<b>7,080</b>

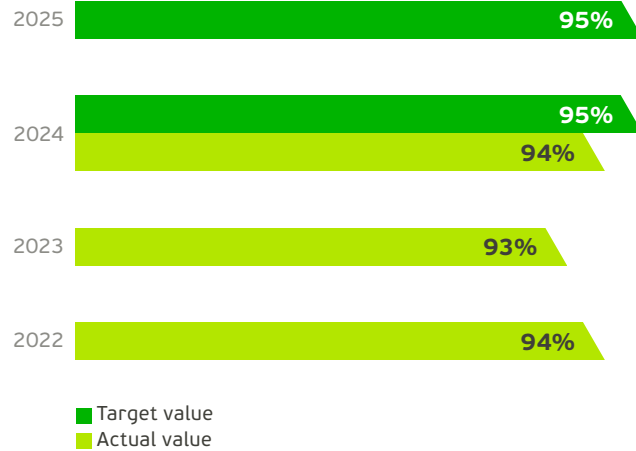
#### Accounting principles

The total headcount of employees at VPK Group is calculated by aggregating the employee count across all countries of operation while excluding freelancers, contractors and interim workers. The headcount is taken at the end of the reporting period.



## Employees by contract type

### Percentage of permanent contracts



% temporary to temporary + permanent contracts			
By country	2022	2023	2024
BE	0.5%	0.5%	0.3%
CN	0.0%	0.0%	0.0%
CZ	0.0%	0.0%	7.7%
DE	17.4%	14.0%	10.9%
DK	0.0%	0.0%	0.8%
ES	12.5%	3.9%	1.8%
FI	8.8%	5.7%	3.7%
FR	9.4%	12.0%	11.0%
GB	0.0%	0.0%	1.2%
IE	0.0%	0.0%	3.1%
IT	/	4.5%	5.8%
LU	0.0%	3.2%	0.0%
NL	8.0%	6.1%	6.3%
NO	4.0%	6.1%	9.3%
PL	27.8%	26.7%	15.6%
PT	/	6.2%	6.7%
RO	0.0%	0.0%	0.0%
SE	2.8%	3.6%	2.1%
TR	3.9%	3.7%	3.9%
By gender	2022	2023	2024
female	11.3%	13.1%	8.1%
male	5.1%	5.5%	5.1%

### % part time vs full time contracts

By gender	2022	2023	2024
female	10.5%	10.3%	11.0%
male	1.8%	1.5%	2.0%

In 2024, 94% of the contracts were permanent, so we are close to our target of 95%. In particular, we significantly reduced the number of temporary contracts in Germany and Poland in 2024.

### Accounting principles

The percentage of permanent contracts was calculated by dividing the number of permanent contracts at the end of the reporting period by the total number of contracts at the end of the reporting period. Permanent contracts are defined as employment contracts without a fixed end date.

## Metrics

### Collective bargaining coverage and social dialogue (S1-8)

Collective bargaining agreements (CBA)			
	2022	2023	2024
Covered employees	66%	74%	72%

In 2024, 72% of employees were covered by collective agreements.

#### ■ Accounting principles

The percentage was calculated by dividing the headcount of employees covered by collective bargaining agreements at the end of the reporting period by the total headcount of employees at the end of the reporting period.

## Metrics

### Diversity (S1-9)

Gender in top management		
	Number of top managers 2024	Percentage of top managers 2024
Male	21	84%
Female	4	16%

In 2024, 16% of top managers were women and 84% were men. This ratio reflects the overall gender distribution among VPK employees, with 17% women and 83% men.

#### ■ Accounting principles

Top management is defined as level N-1 and N-2, with level N = CEO.

## Metrics

### Training and skills development (S1-13)

Average hours of training per fulltime equivalent employee



#### Training and education

Training hours per fulltime equivalent employee	2022	2023	2024	% vs. LY*
blue collar	13	19	22	18%
white collar	11	22	21	-4%
female	13	17	24	43%
male	13	20	22	8%

\* LY: last year

In 2024, employees received on average 23 hours of training, meaning we reached our target of at least 20 hours of training per fulltime equivalent employee per year.

We have set the specific target to train 90% of VPK's employees in the code of conduct and whistleblowing system by 2026. Unfortunately, we cannot provide data for this KPI for 2024. We will start reporting on this metric from 2025 onwards.

#### Accounting principles

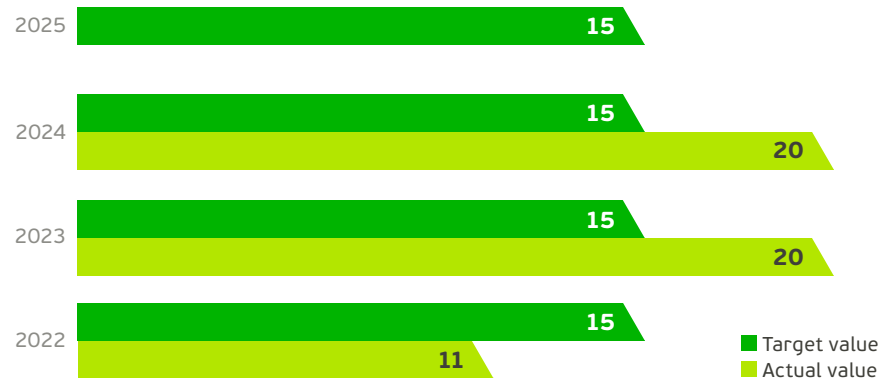
Training hours are defined as time spent on training and skills development. Training and skills development involves various methodologies such as on-site training, online courses, workshops, certification programmes, etc. Training hours per employee and by gender are calculated by dividing the total recorded training hours in VPK Group by the headcount for each gender at the end of the reporting period.



## Metrics

### Employee wellbeing (entity-specific)

#### Number of sites with completed employee engagement surveys



In 2024, employee engagement surveys were organized at 20 sites, so we reached our target of engagement surveys in at least 15 sites.

#### Accounting principles

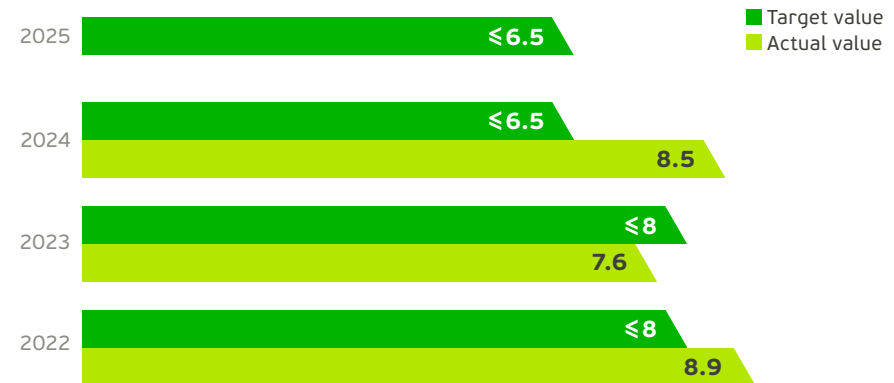
For this metric we counted the number of sites that had an employee engagement survey executed during the last year.

## Metrics

### Health and safety (S1-14 and entity-specific)

#### Work-related injuries

##### Lost time injury rate (LTIR)



In 2024, the Lost Time Injury Rate was 8.5, which is a 12% increase compared to 2023. This means we missed our target of 6.5. The reason for the increase in 2024 is twofold: we suffered an increase in accidents throughout our paper division and the in 2023 acquired Corex Iberia sites were added to the data collection.

In 2024, we recorded no occupational fatalities among our employees or any workers operating on our sites.

## Work related injuries

Employees	2022	2023	2024	% vs. LY*
Fatalities	0	0	0	/
Recordable work related injuries	91	77	88	14%
LTIR	8.9	7.6	8.5	12%
Hours worked	10,189,706	10,154,756	10,404,083	2%
Lost calendar days	3,275	3,869	3,218	-17%
Value chain workers	2022	2023	2024	% vs. LY*
Fatalities	0	0	0	/
Work related injuries	39	55	40	-27%
Non-employees	2022	2023	2024	% vs. LY*
Fatalities	0	0	0	/
Work related injuries	77	101	89	-12%

\* LY: last year

### Accounting principles

The LTIR is calculated as follows: number of recordable work-related accidents multiplied by one million divided by total hours worked. This gives an expression of the number of accidents per million exposure hours.

“Work-related” accidents are all accidents that are caused by or are otherwise in connection with work. An accident is work-related if any of the following play a significant role:

- The way the work activity was carried out i.e. the system of work or the work instruction.
- If any machinery, plant, substances or equipment are being used for the work activity.
- The condition of the site, premises, buildings, structure where the accident happened.

Accidents that involve people travelling to or from work are not included in work-related accidents.

‘Recordable’ work-related accidents are work-related accidents that result in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid or loss of consciousness. It also encompasses significant injury or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

‘Lost calendar days’ are the days lost due to injuries, including the first and last full days of absence, and including all calendar days of the period (e.g., incl. weekends and public holidays).

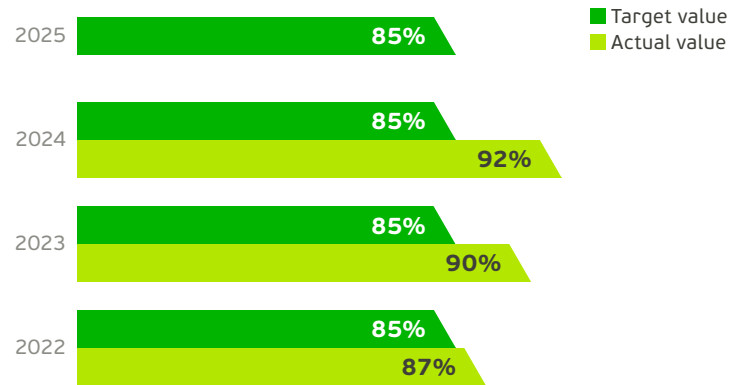
‘Non-employees’ are workers provided by temporary employment agencies and individual contractors supplying labour to VPK (self-employed people).

‘Value chain workers’ are contractors that are not part of VPK’s own workforce but are working on VPK premises or premises managed by VPK group.



## Hazardous situations and near misses

### Hazard and near miss close out rate



#### Hazardous situations and near miss incidents

	2022	2023	2024	% vs. LY*
Reported	7,103	10,608	12,640	19%
Closed out	6,184	9,696	11,664	20%

\* LY: last year

In 2024 we reported 12,640 hazards and near misses, marking a 19% positive increase compared to 2023. Additionally, we closed out 92% of required safety actions, surpassing our 85% target.

#### Accounting principles

A hazard in the workplace is 'anything with the potential to cause harm'. A near miss is 'an unplanned event that did not result in injury, illness, or damage to property or equipment, but had the potential to do so'. Both reported hazards and near miss situations must be eventually closed out. This is measured on our internal reporting system, known as 'Queens'. This system measures the close-out rate for each site.

## Metrics Incidents, complaints and severe human rights impacts (S1-17)

In 2024, 11 complaints were reported through our whistleblowing system. Of these 11 cases, eight fell within the scope of applicable whistleblowing legislation in the relevant jurisdiction.

Two cases were incidents related to discrimination. These were referred to the local HR department for further action and follow-up.

Other key figures for 2024 related to reported human rights incidents include:

- Zero fines, penalties or compensation for damages as a result of incidents related to discrimination
- Zero incidents related to forced labour, human trafficking or child labour
- Zero fines, penalties or compensation for damages as a result of incidents related to forced labour, human trafficking or child labour

S2

Workers in the value chain

Material impacts, risks and opportunities related to value chain workers and interaction with strategy and business model (SBM-3)

The Double Materiality Assessment conducted in 2024 identified one potential material impact. For more information on the materiality assessment process, see General Information, IRO-1.

Material topics and (sub-)sub-topic	Material impacts	Type of value chain worker impacted	Time horizon
S2 Workers in the value chain			
Health and safety	○ Enhancing workplace safety and minimising accidents contribute to greater job satisfaction and improved productivity for value chain workers	Individuals working at VPK sites but who are not part of VPK's own workforce	■■■■

Material impacts ● positive impact ○ potential positive impact ● negative impact ○ potential negative impact  
Time horizon ■■■ short term ■■■ medium term ■■■ long term ■■■ all time horizons

Based on the materiality assessment, the health and safety of individuals working on VPK sites who are not part of the company's own workforce, such as external contractors, is a priority for VPK. These contractors typically perform specialized services including maintenance, repairs, turnarounds, major renovations or specialized work.

We consider all value chain workers within the scope of our S2 disclosures, as respect for individuals' dignity and human rights is a fundamental principle that informs our business practices throughout our value chain.

At this stage, VPK has not conducted a further risk-based assessment of value chain workers with specific characteristics, those operating in particular contexts or those engaged in particularly hazardous activities.

VPK has not identified any countries, regions or commodities within our value chain that pose a significant risk of child labour, forced labour or compulsory labour.

**Strategic response to material impacts on value chain workers**  
VPK's business strategy prioritises workplace safety and operational efficiency, extending its commitment beyond its direct workforce to include value chain workers such as contractors working on VPK sites. The company's strategic focus on health and safety ensures that all individuals on its premises, including external workers, operate under strict safety protocols.

- Key elements of the strategy:
- Workplace safety and compliance: VPK enforces a rigorous Managing Contractors Procedure (see section on Policies) to mitigate risks and enhance workplace safety. This includes mandatory safety inductions, permits to work, risk assessments, and supervision.
  - Operational efficiency and workforce wellbeing: By fostering a safer work environment, VPK not only reduces workplace incidents but also contributes to greater job satisfaction, productivity, and efficiency across its value chain.
  - Integration with business model: The company's business model, centred on sustainability and operational excellence, incorporates safety as a core component. Ensuring subcontractor compliance supports VPK's commitment to long-term operational resilience and reputational integrity.

This approach not only strengthens VPK's operational resilience but also enhances the wellbeing and productivity of all workers contributing to its success.



## Policies related to value chain workers (S2-1)

VPK has a set of policies that support our human rights approach throughout our value chain.

### Health and Safety Policy

All details on the [Health and Safety Policy](#) can be found in the section S1: 'Own workforce'. The scope of the policy includes external contractors.

### Managing Contractors Procedure

**Content:** The Managing Contractors Procedure outlines VPK Group's approach to ensuring the safety and compliance of contractors working on company premises. It details the legal and moral duties, selection criteria, planning, responsibilities, training, monitoring, and appraisal processes to manage contractors effectively and minimize risks. The document includes various checklists and templates to assist in these processes, such as project manager checklists, contractor safety induction checklists, and dynamic risk assessment templates.

- Legal and moral duties: emphasizes the importance of complying with European and UK health and safety laws to protect both VPK employees and contractors from risks associated with business activities.
- Selection of contractors: highlights the need to consider health and safety aspects and the competence of contractors, including ensuring adequate insurance coverage.
- Planning: stresses the importance of proper planning to prevent accidents, including holding planning meetings and conducting site-specific risk assessments.
- Responsibilities: defines the roles of project managers and maintenance managers in managing contractors, including ensuring contractors understand and comply with safety rules.

- Training: ensures contractors receive site safety inductions and that their training records are maintained.
- Monitoring: describes the process for supervising and monitoring contractors' health and safety performance throughout their work.
- Contractor appraisal: outlines the appraisal process to determine if contractors meet safety requirements and can be considered for future work.

**Scope:** All employees, contractors, and subcontractors involved in any contractual work on VPK Group premises. Most senior level accountable for implementation:

Group Safety Manager, reporting to the Safety Steering Committee and the Executive Committee

**Third-party standards/initiatives:** N/A

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible by all employees, contractors, and subcontractors through the company's internal documentation system.

### Sustainable Procurement Policy

**Content:** The [Sustainable Procurement Policy](#) is the foundation of our public commitment to building a more sustainable supply chain. It outlines how we approach the integration of environmental and labour and human rights considerations into our procurement practices. The main objective is to engage with suppliers to mitigate any negative social and environmental harm and help drive positive impact.

**Scope:** All employees involved in procurement activities on behalf of our organisation, contractors, and Tier-1 suppliers

**Most senior level accountable for implementation:**

Group Procurement Manager, reporting to the Sustainability Steering Committee and the Executive Committee

**Third-party standards/initiatives:** The Ten Principles of the UN Global Compact

**Stakeholder consideration:** Internal content experts

**Availability:** via company website; available to all employees, contractors and suppliers

### Supplier Code of Conduct

**Content:** In the [Supplier Code of Conduct](#) VPK Group sets out its approach towards human rights for value chain workers and commits to keep its approach in line with international human rights frameworks

**Scope:** All employees involved in procurement activities on behalf of our organisation, contractors, and Tier-1 suppliers

**Most senior level accountable for implementation:**

Group Procurement Manager, reporting to the Sustainability Steering Committee and the Executive Committee

**Third-party standards/initiatives:** The Universal Declaration of Human Rights, the Ten Principles of the UN Global Compact, the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible via company website; available to all employees, contractors and suppliers

### Human Rights Policy

All details on the [Human Rights Policy](#) can be found in section S1: 'Own workforce'. The scope of the policy includes the entire value chain.

## Processes for engaging with value chain workers about impacts (S2-2)

VPK has several processes for engaging with workers in our value chain — directly and indirectly — about impacts which may affect their health, safety and wellbeing, or may otherwise adversely impact their fundamental human and labour rights. Such processes ensure that workers can voice concerns, complaints, or grievances related to impacts — as well as the full range of human rights and labour rights risks that workers in the upstream value chain may face.

### Whistleblowing service

Our whistleblowing service is available to enable workers throughout the value chain to raise questions and concerns rapidly and efficiently, in confidence and without fear of retaliation. More information on the whistleblowing system is available in Section G1: 'Business conduct'.

**Participants:** Internal and external stakeholders, including value chain workers

**Type of engagement:** Participation

**Frequency of the engagement:** Ad hoc

**Most senior role responsible:** Chief Legal Officer

### Supplier performance reviews

In the performance review, suppliers are evaluated on sustainability metrics, with a focus on carbon footprint, CO<sub>2</sub> targets, EUDR compliance, and FSC® certification. They are encouraged to proactively share progress on sustainability in their operations and supply chains and to share innovations that could help us improve the sustainability impact of our products.

**Participants:** VPK buyer, supplier

**Type of engagement:** Participation

**Frequency of the engagement:** Annual

**Most senior role responsible:** Group Procurement Manager

### Supplier visits

On-site visits of paper suppliers are conducted by VPK buyers. During these visits, the buyer observes work practices, including how tasks are performed, how workers interact with each other and management, and whether health and safety protocols are followed. Beyond workplace observation, buyers engage workers in discussions about opportunities for improvement and empowerment. This can include training needs, or health and safety initiatives.

**Participants:** VPK buyer, supplier

**Type of engagement:** Participation

**Frequency of the engagement:** Ad hoc

**Most senior role responsible:** Group Procurement Manager

### Surveys and interviews

Suppliers are invited to participate in surveys and interviews related to, for example, the Materiality Assessment. In 2024, we conducted dedicated interviews with our strategic suppliers to validate key topics as input for the Double Materiality Assessment.

**Participants:** Suppliers

**Type of engagement:** Consultation

**Frequency of the engagement:** Ad hoc

**Most senior role responsible:** Group Procurement Manager, Group Sustainability Manager

### Specific engagement related to value chain workers working at the VPK sites

Accountability for occupational health and safety is embedded within the divisions, supported by clearly defined governance practices that promote collaboration and knowledge sharing across the Group. For more information, see section S1 on 'Own workforce', as well as General Information sections GOV-1 and GOV-2. When necessary, relevant stakeholders such as workers' representatives, contractors, and suppliers are consulted to ensure their input and perspectives are considered in safety-related decisions and initiatives. Engagement takes place at the sites through ongoing, regular activities such as discussions, trainings, and safety walks. We also launched a safety campaign in 2024 to share good safety practices among employees and contractors and to support the development of a safer working environment. More information can be found in section S1-4: 'Actions related to Own Workforce'.



## Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3)

VPK has implemented effective grievance mechanisms that enable stakeholders to report any potential incidents within our supply chain. Our whistleblowing system is accessible to all stakeholders, including value chain workers, allowing them to raise concerns regarding any violations or ethical irregularities. Reports can be submitted anonymously, ensuring a safe and transparent process. For more details, please refer to section G1: 'Business Conduct'.

In addition to the whistleblowing system, stakeholders can also report any observed shortcomings directly to VPK's designated contact person. We are committed to addressing any non-compliance issues and ensuring that appropriate procedures are in place for handling such cases.

## Targets related to value chain workers (S2-5)

VPK Group has set the following sustainability targets related to value chain workers:



- Ensuring that by 2028 at least 90% of the spend with our strategic suppliers is covered by the VPK Supplier Code of Conduct or equivalent.
- Ensuring that by 2028, 90% of the spend with strategic suppliers is assessed through VPK's ESG Due Diligence process, evaluating social impact, environmental practices, and governance.

Strategic suppliers are suppliers of raw materials, goods and services, in/outbound logistics and capital investments with a minimum annual spend of €1 million, accounting for approximately 50% of VPK Group's total expenditure.

Our target related to resource use (see Section E5-3):



Ensuring that by 2025 100% of our supply consists of FSC® Chain of Custody-certified materials for the production of our paper, corrugated boxes and sheets

is also related to human rights in the supply chain, as FSC® Chain of Custody certification requires suppliers to comply with the FSC® core labour requirements. These core labour requirements cover the abolition of child labour, elimination of all forms of forced or compulsory labour, elimination of discrimination with respect to employment and occupation, upholding freedom of association, and the effective recognition of the right to collective bargaining.

We have not defined specific targets related to health and safety of contractors. However, the scope of our health and safety targets for own workforce (see Section S1-5) also includes contractors.

## Actions related to value chain workers (S2-4)

### Health and safety actions (for value chain workers working at VPK sites)

#### ACTIONS TAKEN IN 2024

We continuously take measures to improve health and safety at the workplace, for our employees and contractors. More information is available in Section S1-4: 'Own workforce'. With respect to contractors, we take the following specific additional measures:

- Ensuring compliance with Managing Contractors Procedure: individual sites are responsible for implementing safety inductions, issuing permits to work, and verifying contractor risk assessments, training, and insurance details.
- Policy refinement: data from incident investigations and safety performance assessments inform updates to the Managing Contractors Procedure, ensuring it remains relevant and effective.
- Safety induction and training: all contractors arriving on-site receive a mandatory safety induction before commencing work.
- Ongoing supervision and monitoring: contractors' behaviour is actively supervised, with incidents and accidents investigated promptly.
- Safety issue resolution: any safety concerns raised by contractors are thoroughly investigated and resolved to maintain a secure working environment.
- Technology and process improvements: integration of digital tools such as the Group Safety and Health SharePoint allows seamless access to contractor safety information, improving compliance tracking and communication.

#### 2025 OUTLOOK

In 2025, we will work on:

- Continuation of established safety practices: VPK will maintain its stringent contractor safety procedures, including inductions, risk assessments, and supervision.
- Incident and concern management: any safety issues raised by contractors will continue to be promptly investigated and resolved.
- Enhanced monitoring: ongoing supervision and monitoring of contractors on-site will remain a priority to ensure compliance with safety standards and se risks.

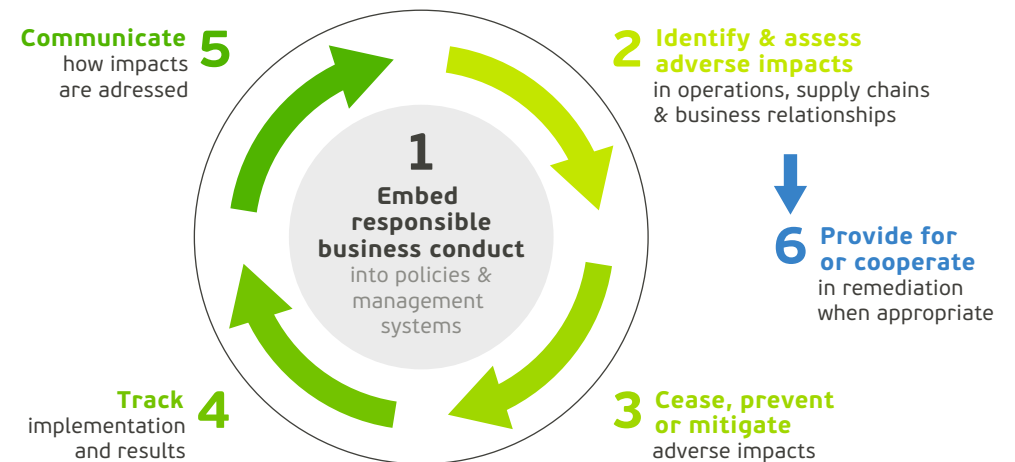
### Sustainable procurement actions (for all value chain workers)

#### ACTIONS TAKEN IN 2024

Supplier risk and compliance management are key pillars of VPK's sustainable procurement roadmap, supporting responsible practices throughout the supply chain. Our supply chain consists of many suppliers worldwide, delivering raw materials (mainly paper) and providing services such as transport.

As regards our paper supply chain specifically, we secure fair labour conditions by using materials from FSC® Chain of Custody-certified supply chains. We use 100% FSC® CoC-certified paper. More information is available in Section E5: 'Metrics on resource inflows'.

We are implementing a due diligence process across our upstream value chain to identify, prevent, mitigate, and account for adverse impacts. The process is based on the OECD (Organization for Economic Co-operation and Development) Due Diligence Guidance for Responsible Business Conduct:





In 2024 we focused on the first two steps:

- Embed responsible conduct into policies and management systems: The Supplier Code of Conduct is our policy for responsible business conduct throughout the supply chain. An increasing number of our strategic suppliers confirmed adherence to the Supplier Code of Conduct or an equivalent code, and we continue to engage with others to further expand alignment.
- Identify and assess adverse impacts: We selected a tool for supply chain monitoring. With this tool, we conducted an initial ESG risk-mapping of the VPK Group supplier network, leading us to identify seven high-risk suppliers that are located in Turkey and active in the transport and construction industries. These high-risk suppliers are under close monitoring, using an AI tool that detects high-impact events.

## 2025 OUTLOOK

In the coming years, we will roll out further improvements to our due diligence process, focusing on:

- Online monitoring of suppliers: Using the AI tool, we will continuously monitor ESG-related events in our supply chain. In the event of alerts the Sustainability Steering Committee will decide on the actions to be taken, based on the severity of the alert and the strategic importance of the supplier.
- Action plans and follow-up with suppliers: In the event of high-impact alerts, we will engage with suppliers to set up an action plan, and implementation will be monitored.
- Supplier assessments for strategic suppliers: To prevent adverse impacts we will regularly evaluate our strategic suppliers on their social impact and responsibility, environmental practices, and governance by means of an assessment in which the supplier is involved.

## Metrics (entity-specific)

Health and safety metrics are reported in section S1: 'Own workforce'.

The metric '% FSC® Chain of Custody-certified input materials' can be found in Section E5: 'Resource use and circular economy'.

In addition, we monitor the following metrics related to value chain workers:

	2024
% of spend with strategic suppliers covered by signed VPK Supplier Code of Conduct or equivalent code	54%
% of spend with strategic suppliers evaluated on ESG practices	No data yet



### Accounting principles

Strategic suppliers are suppliers of raw materials, goods and services, in/outbound logistics and capital investments with a minimum annual spend of €1 million. They account for approximately 50% of VPK Group's total expenditure.

Data on the suppliers that have signed the Supplier Code of Conduct is managed using our Supplier Sustainability Platform.

PART  
**5**

# Governance information



# content part 5

Business conduct (G1)

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# G1

## Business conduct

### Material impacts, risks and opportunities related to business conduct and their interaction with strategy and business model (SBM-3 and IRO-1)

In the double materiality assessment, none of the impacts, risks, and opportunities related to business conduct were deemed material. As a result, there is no obligation to make any disclosures in relation to G1 in our sustainability statement. Nevertheless, we have chosen to disclose information on business conduct voluntarily, as it forms the foundation of our legal and social licence to operate.

### Role of administrative, management and supervisory bodies related to business conduct (GOV-1)

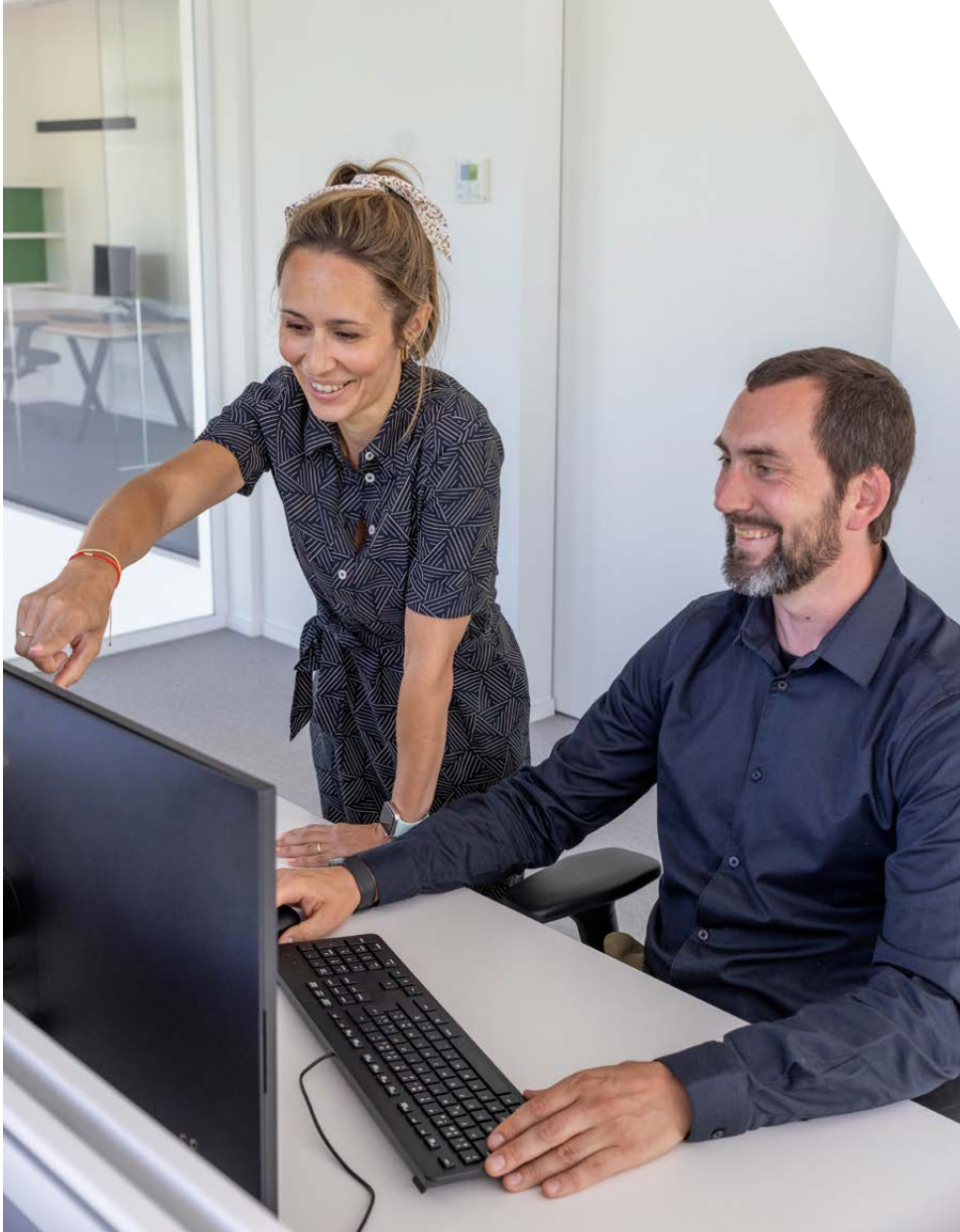
The Board of Directors approves the [Code of Conduct](#), the [Supplier Code of Conduct](#) and the Corporate Governance Charter (see section G1-1) which set out VPK's expectations in terms of responsible and ethical behaviour.

The composition of the Board of Directors is such that there is sufficient expertise on the various activities of the Company as well as sufficient diversity in competences, background, age and gender. A Director who is not nominated by a Family Branch must be professionally active and have board experience in at least one company of adequate size and reputation. A Director nominated by a Family Branch must have professional management experience, be economically literate and maintain a strong connection with the business.

In its current composition, board members have the following expertise:

- **Ethics and compliance expertise:** board members with experience in developing and overseeing corporate codes of conduct, whistleblower policies, and anti-corruption programmes: Dirk Meeus, attorney in an international law firm; Wolfgang de Limburg, Managing Partner of a private equity firm; Denis Zenner, Head of VPK's Specialties Division; Pierre Macharis, Managing Director.
- **ESG and sustainability governance:** board members with experience in ensuring ethical and sustainable business practices, as well as integrating sustainability metrics into corporate strategy and risk management: Carla Sinanian, Chief Strategy Officer; Veronique Hoflack, Division President; Pierre Macharis, Managing Director; Jean-Paul Macharis, former managing director and chairman of the VPK Group.
- **Anti-corruption and fraud risk management:** board members with experience in detecting and preventing financial misconduct, fraud and bribery, as well as experience in aligning corporate policies with global anti-corruption frameworks: Carl Verstraelen, former CFO; Dirk Meeus, attorney in an international law firm; Wolfgang de Limburg, Managing Partner of a private equity firm.
- **Data privacy and cybersecurity governance:** board members with experience in human rights and supply chain due diligence, overseeing data protection and cybersecurity risks, and ensuring compliance with GDPR, CCPA and other data privacy laws: Dirk Meeus, attorney in an international law firm; Carl Verstraelen, former CFO; Carla Sinanian, Chief Strategy Officer.
- **Diversity, equity and inclusion leadership:** board members with expertise in workplace diversity, anti-discrimination policies, and inclusive corporate cultures: Veronique Hoflack, Division President.
- **Stakeholder and crisis experience:** board members with experience in stakeholder engagement, crisis communication, and reputation management during ethical breaches or compliance failures: Jean-Paul Macharis, former managing director and chairman of the VPK Group; Dirk Meeus, Managing Partner; Pierre Macharis, Managing Director.





## Policies related to business conduct and corporate culture (G1-1)

### Business conduct policies

VPK has implemented comprehensive policies that guide employees, management, and stakeholders in maintaining high standards of business conduct. These policies are outlined in the [Code of Conduct](#), the [Supplier Code of Conduct](#) and the Corporate Governance Charter.

#### CODE OF CONDUCT

**Content:** The Code of Conduct sets forth the ethical principles, legal compliance requirements, and expected behaviours for all employees, including the executive management. It covers key areas such as integrity in business dealings, anti-corruption, conflict of interest, fair competition and respect for human rights, including labour rights.

**Scope:** All employees

Most senior level accountable for implementation: Legal department reporting to the Executive Committee

**Third-party standards/ initiatives:** The UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Conventions and the ten principles of the United Nations Global Compact, as well as local legislation when applicable

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible via company website; available to all employees

#### SUPPLIER CODE OF CONDUCT

The Code of Conduct is complemented by the Supplier Code of Conduct, which outlines our expectations of our suppliers to conduct business in a legal, ethical and socially and environmentally responsible manner. We communicate the Supplier Code of Conduct to all strategic suppliers and require them to confirm that they will comply with its content. More information can be found in the chapter 'S2: Value chain workers'.

## CORPORATE GOVERNANCE CHARTER

**Content:** The Corporate Governance Charter defines the principles of sound corporate governance, transparency, and accountability. It includes the roles and responsibilities of the Board of Directors, executive management, and committees in ensuring compliance with ethical and regulatory standards.

**Scope:** Administrative, management and supervisory bodies  
Most senior level accountable for implementation: Secretary reporting to the Board of Directors

**Third-party standards/initiatives:** N/A

**Stakeholder consideration:** Internal content experts

**Availability:** Accessible via intranet on the legal platform

To cultivate a corporate culture that aligns with its business conduct policies, VPK undertakes the following initiatives:

- Leadership commitment: Senior management leads by example, demonstrating ethical behaviour and reinforcing the importance of business integrity in decision-making.
- Training and awareness: Regular training programmes or communications on ethical conduct, compliance, and corporate values are provided to employees.
- Stakeholder engagement: The company fosters an open dialogue with employees, customers, suppliers, and investors to ensure alignment with ethical and governance principles.
- Performance monitoring and compliance: Internal audits and reviews are conducted periodically to assess adherence to the business conduct policies.
- Whistleblowing system: A confidential reporting channel is available for employees and stakeholders to report unethical behaviour or violations of policies without fear of retaliation (see below).

## Oversight by the administrative, management and supervisory bodies

Ultimately, the Board of Directors is responsible for overseeing VPK's corporate culture and business conduct. The Board of Directors, acting as the Audit Committee, reviews compliance with our business conduct policies annually through the Internal Audit Board of Director's Report, the report of the external auditor and the draft sustainability report. These reports address any non-compliance with our business conduct policies, among other subjects. Along with this annual review, the Board handles any action points within the scope of the business conduct policies when reported by the Executive Committee during the other board meetings held throughout the year.

The Executive Committee meets on average every 3 weeks throughout the year and handles all action points within our business conduct policies. Typical aspects of corporate culture that are taken into consideration and discussed by the Executive Committee include:

- Ethical standards and integrity: ensuring adherence to the company's Code of Conduct and ethical business practices.
- Leadership and accountability: evaluating how leadership fosters corporate values and holds employees accountable.
- Employee engagement and wellbeing: addressing workplace morale, mental health, diversity and overall employee satisfaction.
- Transparency and communication: encouraging open and honest communication within the organization.
- Innovation and adaptability: assessing how the company fosters a culture of continuous improvement and responsiveness to change.

- Risk management and compliance: ensuring adherence to legal and regulatory frameworks.
- Stakeholder relations and reputation management: managing relationships with investors, customers, suppliers, and the broader community.

## Mechanisms for identifying, reporting and investigating concerns

Anyone who becomes aware of potential or actual violations of the Code of Conduct or other policies is encouraged to report this through one of various channels available. Besides the possibility of reporting to a superior, HR or the legal department and as per EU Whistleblowing Directive 2019/1937 and all transpositions into national law by the EU Member States, reports can also be made through VPK's official internal reporting channel ([compliance@vpkgroup.com](mailto:compliance@vpkgroup.com); +32 52 30 79 57), via [www.vpkgroup.com](http://www.vpkgroup.com).

The VPK whistleblowing system allows employees within the group, as well as relevant external stakeholders, to report unethical or illegal activities within the company. This system supports VPK's compliance strategy and covers areas like racism, harassment, data breaches, and more.

Reports can be made confidentially and, if using the reporting tool on VPK's website, with full anonymity if desired. The legal department of VPK Group nv objectively investigates these reports in cooperation with designated local staff. Whistleblowers receive feedback within three months. VPK upholds non-retaliation against good faith reporters and emphasizes that false allegations can result in disciplinary action. The system complies with GDPR requirements, with personal data processed solely for investigation purposes and kept confidential.

A detailed description of the whistleblowing system can be found in the whistleblowing policy which is attached as an annexe to our Code of Conduct.

Beyond the procedures in place to follow-up on reports by whistleblowers, VPK also has established procedures for investigating business conduct incidents, including incidents of corruption and bribery, promptly, independently and objectively. Such incidents are reported to the Executive Committee and Chief Legal Officer. The Executive Committee appoints an internal auditor or an independent third party (depending on the nature of the incident) to investigate the incident, who report to the Executive Committee and Chief Legal Officer. Depending on the severity of the incident, the final report is shared with the Board of Directors.

### Training and communication

Training and information about business conduct policies and the whistleblowing system will be provided to employees in 2025. This training is provided to every employee with a VPK email account and will be available in the respective employees' languages. The Executive Management will also participate in this training. Training will be repeated on a regular basis over the following years, targeting particular groups of employees on specific topics which are relevant in view of their positions.



Our target is that, by the end of 2026, 90% of VPK Group's employees\* will have undergone mandatory training on the Code of Conduct and whistleblowing system.

\* Employees with a VPK email address

## Management of relationships with suppliers (G1-2) and payment practices (G1-6)

### Payment practices

Our procurement processes rely on a standard practice in which payments to suppliers must above all be made in accordance with the original, agreed terms of the contract. In circumstances where payment terms are not codified, we aim to pay all invoices within 60 days, or within the equivalent local standard where such applies.

VPK has procedures, processes and controls in place to ensure payment within the agreed payment terms and to ensure compliance with maximum payment terms regulations.

While payment terms vary depending on categories of purchase and between regions, the average payment terms was 50 days in 2024.

There were no material legal claims outstanding for late payments to suppliers in 2024.

### Accounting principles

To calculate the average payment terms of 50 days for the year 2024, we have considered the average amount the company owes to its suppliers over the period.

The period in question encompasses the entire year 2024 (365 days). This amount is then divided by the average cost of producing the goods sold, which includes expenses such as raw materials, goods, and services.

### Engaging with our suppliers on sustainability

Combating corruption and respecting human rights and the environment are integral to VPK's supplier requirements, as outlined in our Supplier Code of Conduct. See section 'S2: Workers in the value chain' for information about VPK's supply chain and how the company considers sustainability matters in the procurement process.



## Prevention and detection of corruption and bribery (G1-3)

VPK does not tolerate any form of bribery or corruption, including facilitation payments and kickbacks. Furthermore, VPK is committed to complying with all applicable laws and regulations to fight corruption and bribery, including the UN Convention against Corruption. We actively work to prevent corruption and bribery, which is why anti-corruption and anti-bribery are integral to our Code of Conduct and Supplier Code of Conduct.

The Code of Conduct provides clear guidelines in the event of requests for facilitation payments, offering and receiving gifts, engaging in sponsorships or requests for political contributions, to ensure they do not serve as attempts to improperly influence decisions.

Similarly, the Supplier Code of Conduct includes clear requirements for suppliers not to influence VPK employees or representatives by offering gifts or favours.

For the prevention of bribery and corruption within our own operations, we have implemented organizational procedures to maintain constant oversight over company expenses. An integral part of these procedures is our approval system. To ensure the highest standards of integrity and transparency within our operations, we have established a comprehensive framework for the prevention of bribery and corruption. This framework is designed to maintain continuous oversight of company expenses and financial transactions through a structured system of controls and audits.

This structured oversight mechanism ensures financial transparency, accountability, and compliance with anti-bribery regulations, reinforcing our commitment to ethical business conduct. Furthermore, our assessments of actors within our value chain involve the identification of risks related to corruption and bribery.

Any allegations or incidents related to corruption or bribery are investigated by the internal auditor and/or by the legal department at VPK Group NV, the parent company of the VPK Group, if reported internally or through our whistleblowing system, in accordance with our whistleblowing policy. If a violation is confirmed, it is promptly addressed and corrective measures are taken.

The internal auditor works independently from the Executive Management and has a direct reporting line to the Board of Directors.

To ensure that our employees understand the policies related to anti-corruption and anti-bribery, our Code of Conduct trainings, as explained in the section 'Training and communication' under 'G1-1: Business conduct policies and corporate culture', will include an e-learning module on anti-bribery and anti-corruption.

As part of our anti-corruption and anti-bribery measures, management members and sales and procurement staff of business units located in countries scoring less than 60 on Transparency International's anti-bribery index are scheduled to receive recurring specific and compulsory training on this topic.

Our **multi-layered defence system** consists of:

First line of defence	Second line of defence	Third line of defence
<b>Embedded controls</b> Our approval system and segregation of duties are integrated into VPK's administrative systems to prevent unauthorized transactions and ensure accountability in financial decision-making.	<b>Internal financial controllers</b> Dedicated internal financial controllers at business unit and divisional level supervise costs and spending, ensuring financial discipline, segregation of duties and adherence to internal guidelines.	<b>Internal audit</b> An independent internal audit function regularly assesses financial controls, segregation of duties and compliance with company policies, identifying and addressing potential risks and reporting any incidents to the Board of Directors through the internal auditor's annual report.
Fourth line of defence		
<b>External audit</b> Our financial records and internal control systems undergo an annual independent audit by a Big Four accounting firm, providing an objective assessment of compliance and financial integrity.		





## Metrics

### Incidents of corruption or bribery (G1-4)

Key figures for 2024 related to reported incidents of corruption or bribery include:

- Zero convictions for violations of anti-corruption and anti-bribery laws
- Zero fines for violations of anti-corruption and anti-bribery laws
- Zero confirmed incidents of corruption or bribery
- Zero confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents
- Zero confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery
- No legal cases regarding corruption or bribery brought against VPK or our own workers

#### ■ Accounting principles

The number of confirmed incidents of corruption and/or bribery reported or occurred during the reporting period is calculated using data from the VPK whistleblowing system and other channels. The total number of convictions and total amount of fines for violations of anti-corruption and anti-bribery laws in the reporting period is provided by the legal department. A confirmed incident (of corruption and bribery) is a report that has been found to be substantiated. Substantiated reports of corruption do not include reports of corruption that are still under investigation at the end of the reporting period. A determination as substantiated by a court of law is not required. A substantiated report is proven to be true, valid, or supported by evidence.

PART  
**6**

# Annex





# content

## part 6

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# Assurance statement

## Independent Auditor's Limited Assurance Report

To the Board of Directors of VPK Group NV

REPORT ON SELECTED SUSTAINABILITY INFORMATION REGARDING THE REPORTING YEAR 2024 INCLUDED IN VPK'S REPORT 'SUSTAINABILITY REPORT 2024'

### Limited assurance conclusion

We have performed a limited assurance engagement on whether VPK Group NV ("VPK")'s selected sustainability information as of and for the year ended December 31, 2024, listed below and marked with "✖" included in VPK's report 'Sustainability report 2024' (the "Selected Information"), has been prepared in accordance with the applied reporting criteria as disclosed in VPK 's report 'Sustainability report 2024' (hereafter the "Reporting Criteria").

The Selected Information is described below:

- Scope 1 GHG emissions (Tonnes CO<sub>2eq</sub>)
- Scope 1 biogenic GHG emissions (Tonnes CO<sub>2eq</sub>)
- Scope 2 GHG location-based emissions (Tonnes CO<sub>2eq</sub>)
- Scope 3 GHG emissions (Tonnes CO<sub>2eq</sub>)
- Total GHG emissions (total of scope 1, 2 and 3)

- Water withdrawal (m<sup>3</sup>) – regions with and without water stress broken down as follows:
  - Rainwater
  - Surface water
  - Ground water
  - Municipal water
  - Total Water

Based on the procedures performed and assurance evidence obtained, nothing has come to our attention to cause us to believe that VPK' Selected Information as of and for the year ended December 31, 2024 is not prepared, in all material respects, in accordance with the Reporting Criteria.

Our conclusion on the Selected Information does not extend to any other information that accompanies or contains the Selected Information and our assurance report.

### BASIS FOR CONCLUSION

We conducted our engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* issued by the International Auditing and Assurance Standards Board (IAASB), as adopted in Belgium. Our responsibilities under this standard are further described in the "Our responsibilities" section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA). We are the statutory auditor of VPK and therefore independent

from VPK in accordance with the Belgian independence rules and other relevant ethical requirements applicable in Belgium.

Our firm applies International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, issued by the IAASB. This standard requires the firm to design, implement and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.



## Responsibilities for the Selected Information

The Board of Directors of VPK is responsible for:

- designing, implementing and maintaining internal control relevant to the preparation of the Selected Information that is free from material misstatement, whether due to fraud or error;
- selecting or developing suitable criteria for preparing the Selected Information and appropriately referring to or describing the criteria used;
- selecting and applying policies, making judgements that are reasonable in the circumstances and maintaining adequate records in relation to the Report and the Selected Information contained herein; and
- preparing the Selected Information in accordance with the Reporting Criteria.

## Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the Selected Information is free from material misstatement, whether due to fraud or error;
- forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and

- reporting our conclusion to the Board of Directors of VPK.

We exercised professional judgment and maintained professional skepticism throughout the engagement. We designed and performed our procedures to obtain evidence about the Selected Information that is sufficient and appropriate to provide a basis for our conclusion. Our procedures selected depended on our understanding of the Selected Information and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise. In carrying out our engagement, we:

- Interviewed relevant staff responsible for providing the information, for carrying out internal control procedures on the Selected Information and consolidating the data in VPK's report 'Sustainability report 2024';
- Performed (physical and virtual) site visits to two sites in Belgium aimed at, on a local level, validating source data and evaluating the design and implementation of internal control and validation procedures;
- Reviewed relevant internal and external documentation, on a limited test basis, in order to determine the reliability of the Selected Information;

- Evaluated for a selection of measurements and calculations included in the Selected Information the plausibility of the identified methods and selected assumptions, as well as the relevance and reliability of selected data sources used for their determination, and verifying the mathematical accuracy of the underlying calculations;
- Performed analytical procedures to confirm our understanding of trends in the Selected Information;
- Reviewed the disclosure and presentation of the Subject Matter Information.

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

Zaventem, June 25, 2025

KPMG Bedrijfsrevisoren  
— Réviseurs d'Entreprises



Digitally signed  
by Filip De Bock  
Date: 2025.06.25  
11:48:23 +02'00'

Filip De Bock  
Bedrijfsrevisor

# Entities included in the consolidated financial statements

Aquila Brzeg Sp.z o.o.  
Aquila GmbH  
Aquila Radomsko Sp.z o.o.  
Aquila Wrzesnia Sp.z o.o.  
Argon BV  
Beihai Corenso Paper Core Co Ltd.  
Blue Paper SAS (50%)  
Cartonnerie de Saint Just Malmont  
Cartonneries de Wallonie SA  
Corenso Foshan Paper Core Co Ltd  
Corenso Group Holdings Ltd.  
Corenso Holdings Germany GmbH  
Corenso United (Deutschland) GmbH & Co KG  
Corenso United Verwaltungs GmbH  
Corex Bäckefors AB  
Corex Belgium NV  
Corex Board Atlantic SAS  
Corex Converting Spain  
Corex Czech sro.  
Corex Finland Oy  
Corex France SAS  
Corex Germany & CO KG  
Corex Holding NV  
Corex Luxembourg SA  
Corex Mohed AB  
Corex Nederland BV  
Corex Sosnowiec Sp.z.o.o.

Corex Swiecie Sp.z o.o.  
Corex Turkey AS  
Corex Wigan Ltd.  
Corrboard UK Ltd.  
Ecoformer NV  
Embalpack Levante S.L.  
Encase Ltd.  
Globcore II, S.A.  
Hangzhou Corenso Hualun PC Co Ltd  
lemme S.R.L (50%)  
Immowell NV  
Interkor LLC (50%)  
Jellestadveien 37 AS  
Nordic Packaging and Container (Jersey) Holdings Ltd.  
Nordic Packaging and Container Holdings Ltd.  
NPAC (Finland) Holdings Oy  
Papeleira Coreboard S.A  
Peterson Eiendom Bäckefors AB  
Peterson Eiendom Norrköping AB  
Peterson Eiendom Randers A/S  
Peterson Eiendom Sarpsborg AS  
Peterson Eiendom Sykkylven AS  
Peterson Holding AS  
S.C. Corex Romania srl.  
SC VPK Packaging srl.  
Smart Packaging Solutions BV  
Smart Packaging Solutions NV

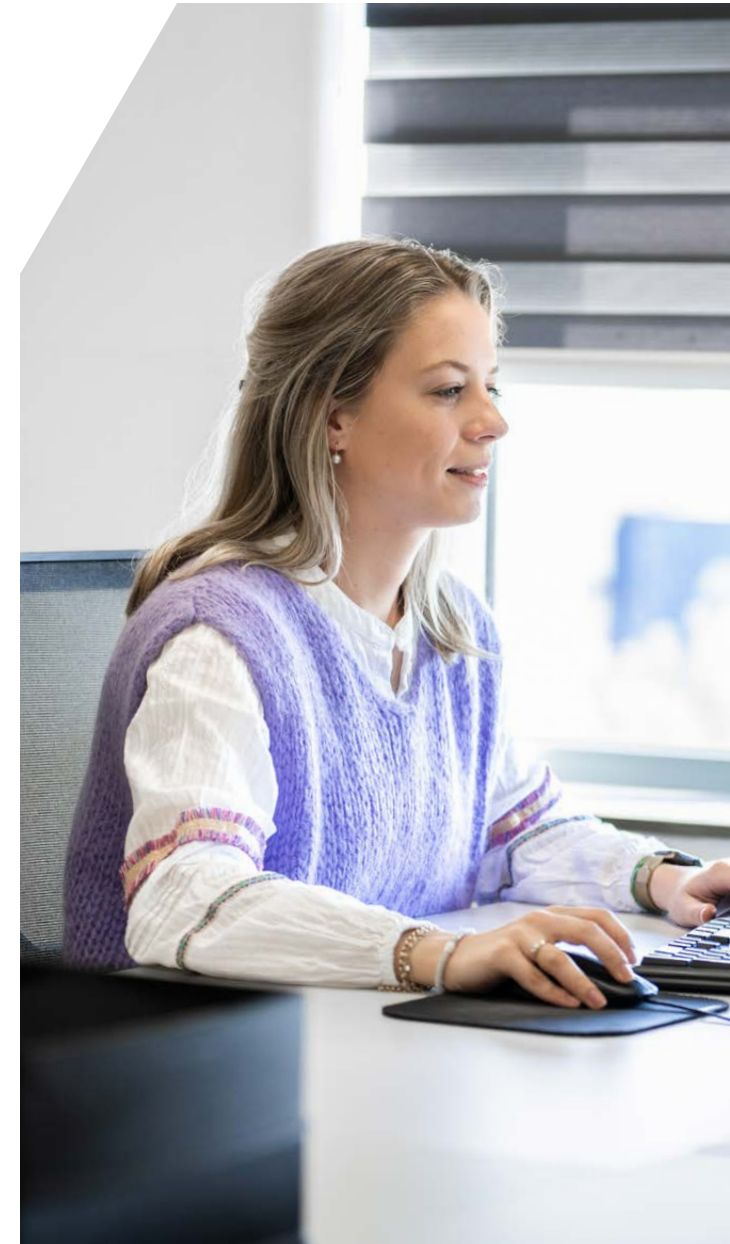
Spiralpack – Manipulados de Papel S.A.  
Viallon Emballage SAS  
VPK Converting SAS  
VPK Corrugating SAS  
VPK Distribution SAS  
VPK Finance NV  
VPK Italia S.r.l.  
VPK Nederland BV  
VPK Packaging A/S  
VPK Packaging AB  
VPK Packaging Alizay SAS  
VPK Packaging AS  
VPK Packaging BV  
VPK Packaging Kft  
VPK Packaging Ltd – Limerick  
VPK Packaging Ltd.  
VPK Packaging NV  
VPK Packaging Polska Sp. z.o.o.  
VPK Packaging SAS  
VPK Paper Normandie SAS  
VPK Paper NV  
VPK Services NV  
VPK UK Holding Ltd.  
Zetacarton S.p.a.  
Zetatransport S.r.l.

# Cyber security strategy and data protection

**In recent years, VPK has increased its investment in cyber security. And we shall continue to do so to ensure business continuity, protect the confidentiality and integrity of customer information, and maintain the timely processing of orders.**

The VPK Cyber security and data protection strategy is built around the following key components:

- **Performance measurement and benchmarking.** VPK is benchmarked against industry and ISO 27000 standards for ICT security, in order to continuously improve its cyber security resilience. A management dashboard is in place to report on Key Performance Indicators.
- **Privacy and data protection.** Our customers can rest assured that we have made all possible investments to protect their personal data against potential security breaches. We have robust data recovery plans in place to deal with any cyber security issues that may arise.
- **Identity and access management (IAM).** In order to ensure our cyber resilience, we swear by the tight management of the digital identities and user access within our IT environment.
- **Third-party risk management.** We participate in our ICT service provider's Security Operations Centre, which covers both preventive analysis of security incidents and incident response management in the event of any cyber incidents.
- **Security reporting.** We continuously follow up on our cyber resilience, which is documented in reports by our Chief Information Security Officer (CISO) and Security Operations Centre (SOC).
- **Awareness.** Through various communications and training sessions, we aim to increase cyber security awareness across the Group.



# Ethics and transparency

**At VPK, we conduct our business in an ethical and sustainable way, and we want to be transparent about it. In this way, we continue to build trust and increase opportunities with customers.**

To share our commitment to sustainable business practices and ensure transparency, we work with four well-respected platforms.



## Supplier Ethical Data Exchange

Sedex is one of the leading collaborative platforms for sharing ethical supply chain data. VPK has been active on the Sedex platform since 2016, sharing and reporting information on four key areas: Labour Standards, Health & Safety, Environment and Business Ethics.

We evaluate our ethical performance based on the number and the rating of the VPK sites that have subscribed to the Sedex platform. Currently, 21 of our production sites are registered on Sedex.



EcoVadis is a globally recognized rating platform that assesses corporate sustainability based on four key categories: environmental impact, labour and human rights standards, ethics, and procurement practices. The objective of the EcoVadis rating is to measure the quality of a company's Corporate Social Responsibility (CSR) management system annually through its policies, actions and results.

At VPK, we use the EcoVadis assessment tool as a management tool to determine our priorities and decide which steps to take next. We have been disclosing our CSR performance on EcoVadis since 2017. Currently, we participate with nine countries and a VPK Group account. We have been awarded 4 Platinum, 4 Gold, and 2 Silver medals. Our goal is to maintain strong performance and continue improving.



## Carbon Disclosure Project

CDP is a global disclosure system, which enables investors, companies, cities, states and regions to manage their environmental impacts. VPK has been using CDP since 2016. Each year, we disclose environmental data in three sections: climate change, water security and forests. In each of these sections, we have reached level B rating.

We also participate in the CDP's Supplier Engagement Rating (SER), which assesses our sustainable contribution to the supplier value chain. More specifically, the SER assesses our performance in terms of governance, targets, CO<sub>2</sub> Scope 3 emissions, and value chain engagement. In this specific domain, we have obtained a level B score.



## United Nations Global Compact



The UN Global Compact is a voluntary corporate sustainability initiative that underpins a company's commitment to implement, disclose and promote the ten universal principles in the areas of human rights, labour, environment and anticorruption.

VPK has been publishing its data on the UN Global Compact since 2020. We adhere to their methodology to document our sustainability journey. As a result, we have defined 12 key performance indicators related to the ten universal principles, as well as the nine most important SDGs for our company.

VPK meets all minimum requirements and submits an annual Communication on Progress (CoP). Our CoP and the CEO Statement of Continued Support are publicly available on the UN Global Compact [website](#).

## Other endorsements

- Cradle To Cradle – since 2016
- Pack4Food – since 2017
- Healthy Printing Initiative – since 2018

## Membership of associations

To enhance and ensure cross-industry collaboration and global partnership for sustainable development, VPK is an active member of various trade organizations, as well as multistakeholder partnerships that mobilize and share knowledge, expertise and technology and also support the achievement of sustainable development goals.

- FEFCO: Federation of European Corrugated Organization
- CEPI: Confederation of European Paper Industries
- CPI: Confederation of Paper Industries (UK)
- InDUFed: Association of Belgian manufacturers of Glass, Paper and Cardboard
- CBA: Corrugated Benelux Association
- NBF: Norske Bølgepappfabrikkeres Forening, Association of Norwegian Corrugated Board Manufacturers.



# Certificates

[▶ GO TO THE ONLINE CERTIFICATE OVERVIEW](#)



division	plant name	ISO9001	ISO14001	OHSAS18001 / ISO45001	ISO50001	FSC®	C2C	Food safety (BRCGS)
Cores and tubes	Farners	✓						
Cores and tubes	Bäckefors	✓	✓					
Cores and tubes	Beihai	✓	✓	✓				
Cores and tubes	Bursa	✓	✓					
Cores and tubes	Cartangola	✓				✓		
Cores and tubes	Corlu	✓	✓					
Cores and tubes	Belgium	✓	✓					
Cores and tubes	Krefeld	✓	✓					
Cores and tubes	Embalpack Levante	✓	✓			✓		
Cores and tubes	Foshan	✓	✓	✓				
Cores and tubes	Hangzhou	✓	✓	✓				
Cores and tubes	Imatra	✓	✓					
Cores and tubes	France	✓	✓			✓		
Cores and tubes	Liljendal							
Cores and tubes	Loviisa	✓	✓					
Cores and tubes	Luxemburg	✓						
Cores and tubes	Mendig					✓		
Cores and tubes	Mohed	✓	✓					
Cores and tubes	Consumer Packaging Nijkerk	✓	✓			✓		
Cores and tubes	Romania	✓				✓		
Cores and tubes	Sosnowiec	✓	✓	✓		✓		
Cores and tubes	Spiralpack	✓				✓		
Cores and tubes	Swiecie	✓						

division	plant name	ISO9001	ISO14001	OHSAS18001 / ISO45001	ISO50001	FSC®	C2C	Food safety (BRCGS)
Cores and tubes	Elduain	✓						
Cores and tubes	Czech	✓	✓					
Cores and tubes	Consumer Packaging Wierden	✓	✓			✓		AA
Cores and tubes	Wigan Limited	✓						
Cores and tubes	Nederland BV	✓	✓			✓		
Cores and tubes	Leaburu	✓	✓					
Corrugated packaging	Alizay	✓				✓		
Corrugated packaging	Andelle	✓				✓		
Corrugated packaging	Bäckefors	✓	✓			✓		
Corrugated packaging	Banbury	✓				✓		AA+
Corrugated packaging	Borgenhaugen_Display							
Corrugated packaging	Courcelles					✓		
Corrugated packaging	Desborough		✓			✓		AA
Corrugated packaging	Distribution					✓		
Corrugated packaging	East Kilbride	✓				✓		AA
Corrugated packaging	Erembodegem					✓		A+
Corrugated packaging	Halden	✓	✓			✓		A
Corrugated packaging	Iemme packaging	✓	✓	✓		✓		
Corrugated packaging	Leeds	✓				✓		AA
Corrugated packaging	Limerick	✓				✓		AA+
Corrugated packaging	Lisieux	✓				✓		
Corrugated packaging	Lille	✓				✓		
Corrugated packaging	Longjumeau	✓				✓		
Corrugated packaging	Norrköping	✓	✓			✓		A
Corrugated packaging	Oudegem					✓		A+
Corrugated packaging	Raamsdonksveer	✓	✓			✓	✓	
Corrugated packaging	Randers					✓		AA

division	plant name	ISO9001	ISO14001	OHSAS18001 / ISO45001	ISO50001	FSC®	C2C	Food safety (BRCGS)
Corrugated packaging	Roye	✓				✓		
Corrugated packaging	Saint-Quentin	✓	✓			✓		A+
Corrugated packaging	Salonta	✓	✓	✓		✓		AA
Corrugated packaging	Selby		✓			✓		AA
Corrugated packaging	Sykkylven	✓				✓		
Corrugated packaging	Tourcoing					✓		
Corrugated packaging	Viallon 1	✓				✓		
Corrugated packaging	Viallon 2	✓				✓		
Corrugated packaging	Wellington		✓			✓		AA+
Corrugated packaging	Zetacarton	✓				✓		
Corrugated packaging and sheets	Aquila VPK Brzeg	✓	✓			✓		AA
Corrugated packaging and sheets	Aquila VPK Radomsko	✓	✓			✓		AA
Corrugated sheets	Leinefelde				✓	✓		
Corrugated sheets	Scunthorpe	✓	✓	✓		✓		
Corrugated packaging and sheets	Aquila VPK Września	✓	✓			✓		
Paper (Cores and tubes)	Board Atlantic	✓	✓	✓		✓		
Paper (Cores and tubes)	Papeleira Coreboard	✓	✓	✓		✓		
Paper (Cores and tubes)	Pori	✓	✓	✓		✓		
Paper (Corrugated packaging)	Paper Normandie	✓	✓		✓	✓		
Paper (Corrugated packaging)	Blue Paper	✓	✓	✓	✓	✓		
Paper (Corrugated packaging)	Oudegem	✓	✓	✓	✓	✓	✓	
Paper (Solid board)	Loenen	✓	✓			✓		AA+
Solid board packaging	Meer					✓		AA
Solid board packaging	Oudegem					✓		A+
Solid board packaging	Loenen	✓	✓			✓		AA+



# European Sustainability Reporting Standards (ESRS) Index (IRO-2)

- Mandatory disclosure requirement
- Material
- Voluntary disclosure

VPK has reported in accordance with the European Sustainability Reporting Standards (ESRS) for the period of January 1, 2024 - December 31, 2024.

Standard	Page	Assured
<b>ESRS 2 General disclosures</b>		
■ BP-1 General basis for preparation of the sustainability statement	p. 21	
■ BP-2 Disclosures in relation to specific circumstances	p. 22	
■ GOV-1 The role of the administrative, management and supervisory bodies	p. 23-27	
■ GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	p. 28	
■ GOV-3 Integration of sustainability-related performance in incentive schemes	Not yet reported	
■ GOV-4 Statement on due diligence	p. 29	
■ GOV-5 Risk management and internal controls over sustainability reporting	p. 30	
■ SBM-1 Strategy, business model and value chain	p. 9-15	
■ SBM-2 Interests and views of stakeholders	p. 31, 80	
■ SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	p. 32, 41, 58, 65, 79, 102, 110	
■ IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	p. 33-37, 40, 58-59, 65, 79-80, 102, 110	
■ IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statements	p. 127-133	
<b>E1 Climate change</b>		
■ GOV-3 Integration of sustainability-related performance in incentive schemes	Not yet reported	
■ E1-1 Transition plan for climate change mitigation	p. 42-48	
■ SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	p. 41	

Standard	Page	Assured
■ IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	p. 33-37, 40-41	
■ E1-2 Policies related to climate change mitigation and adaptation	p. 41	
■ E1-3 Actions and resources in relation to climate change policies	p. 44-48	
■ E1-4 Targets related to climate change mitigation and adaptation	p. 42	
■ E1-5 Energy consumption and mix	p. 49	
■ E1-6 Gross Scope 1, 2, 3 and total GHG emissions	p. 52-57	✱
■ E1-7 GHG removals and GHG mitigation projects financed through carbon credits	p. 57	
■ E1-8 Internal carbon pricing	p. 57	
■ E1-9 Anticipated financial effects from pollution-related impacts, risks and opportunities	Phase-in applied	
<b>E2 Pollution</b>		Not material
<b>E3 Water and marine resources</b>		
■ IRO-1 Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	p. 33-37, p. 58-59	
■ E3-1 Policies related to water and marine resources	p. 60	
■ E3-2 Actions and resources related to water and marine resources	p. 61-63	
■ E3-3 Targets related to water and marine resources	p. 60	
■ E3-4 Water withdrawal	p. 64	✱
<b>E4 Biodiversity and ecosystems</b>		Not material
<b>E5 Resource use and circular economy</b>		
■ IRO-1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	p. 33-37, p. 55-66	
■ E5-1 Policies related to resource use and circular economy	p. 68	
■ E5-2 Actions and resources related to resource use and circular economy	p. 70-73	
■ E5-3 Targets related to resource use and circular economy	p. 69	
■ E5-4 Resource inflows	No data yet	

Standard	Page	Assured
■ E5-5 Resource outflows	p. 75	
■ E5-5 Waste	p. 76	
<b>S1 Own workforce</b>		
■ SBM-2 Interests and views of stakeholders	p. 31, 80	
■ SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	p. 79-80	
■ S1-1 Policies related to own workforce	p. 81-82	
■ S1-2 Processes for engaging with own workers and workers' representatives about impacts	p. 83-84	
■ S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns	p. 85	
■ S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	p. 86-94	
■ S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p. 86	
■ S1-6 Characteristics of the undertaking's employees	p. 95-96	
■ S1-7 Characteristics of nonemployee workers in the undertaking's undertaking's own workforce	Phase-in applied	
■ S1-8 Collective bargaining coverage and social dialogue	p. 97	
■ S1-9 Diversity metrics	p. 97	
■ S1-10 Adequate wages	No data yet	
■ S1-11 Social protection	Not material	
■ S1-12 Percentage of employees with disabilities	Not material	
■ S1-13 Training and skills development metrics	p. 98	
■ S1-14 Health and safety metrics	p. 99-100	
■ S1-15 Work-life balance metrics	Phase-in applied	
■ S1-16 Remuneration metrics	Not material	
■ S1-17 Incidents, complaints and severe human rights impacts	p. 101	

Standard	Page	Assured
<b>S2 Workers in the value chain</b>		
■ SBM-2 Interests and views of stakeholders	p. 31	
■ SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	p. 102	
■ S2-1 Policies related to value chain workers	p. 103	
■ S2-2 Processes for engaging with value chain workers about impacts	p. 104	
■ S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns	p. 105	
■ S2-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	p. 106-107	
■ S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p. 105	
<b>S3 Affected communities</b>	Not material	
<b>S4 Consumers and end-users</b>	Not material	
<b>G1 Business conduct</b>		
■ GOV-1 The role of the administrative, management and supervisory bodies	p. 110	
■ IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	p. 110	
■ G1-1 Business conduct policies and corporate culture	p. 111-113	
■ G1-2 Management of relationships with suppliers	p. 113	
■ G1-3 Prevention and detection of corruption and bribery	p. 114	
■ G1-4 Confirmed incidents of corruption or bribery	p. 115	
■ G1-6 Payment practices	p. 113	



# Data points that derive from other EU legislation (IRO-2)

**Not material:** Information not material to reporting

**Not relevant:** Information complied with or not relevant to operations

The table below outlines the data points derived from other EU legislation as listed in ESRS 2 Appendix B. It indicates where these data points can be found in our report and identifies which data points are assessed as 'Not material'.

Disclosure requirement	Data point		SFDR	Pillar 3	Benchmark Regulation	EU climate law	Page/relevance
ESRS 2 GOV-1	21 (d)	Board's gender diversity	✓		✓		p. 23
ESRS 2 GOV-1	21 (e)	Percentage of board members who are independent			✓		p. 23
ESRS 2 GOV-4	30	Statement on sustainability due diligence	✓				p. 29
ESRS 2 SBM-1	40 (d) I	Involvement in activities related to fossil fuel activities	✓	✓	✓		Not relevant
ESRS 2 SBM-1	40 (d) II	Involvement in activities related to chemical production	✓		✓		Not relevant
ESRS 2 SBM-1	40 (d) III	Involvement in activities related to controversial weapons	✓		✓		Not relevant
ESRS 2 SBM-1	40 (d) IV	Involvement in activities related to cultivation and production of tobacco			✓		Not relevant
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				✓	p. 42-45
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks		✓	✓		p. 42
ESRS E1-4	34	GHG emission reduction targets	✓	✓	✓		p. 42
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources	✓				p. 50
ESRS E1-5	37	Energy consumption and mix	✓				p. 50
ESRS E1-5	40-43	Energy intensity associated with activities in high climate impact sectors	✓				p. 50
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	✓	✓	✓		p. 54
ESRS E1-6	53-55	Gross GHG emissions intensity	✓	✓	✓		p. 55
ESRS E1-7	56	GHG removals and carbon credits				✓	p. 57
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			✓		Phased-in, not disclosed in 2024
ESRS E1-9	66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk		✓			Phased-in, not disclosed in 2024

Disclosure requirement	Data point		SFDR	Pillar 3	Benchmark Regulation	EU climate law	Page/relevance
ESRS E1-9	66 (c)	Location of significant assets at material physical risk		✓			Phased-in, not disclosed in 2024
ESRS E1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		✓			Phased-in, not disclosed in 2024
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities			✓		Phased-in, not disclosed in 2024
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil	✓				Not material
ESRS E3-1	9	Water and marine resources	✓				p. 60
ESRS E3-1	13	Dedicated policy	✓				p. 60
ESRS E3-1	14	Sustainable oceans and seas	✓				Not material
ESRS E3-4	28 (c)	Total water recycled and reused	✓				Not material
ESRS E3-4	29	Total water consumption in m3 per net revenue on own operations	✓				Not material
ESRS 2 SBM-3 E4	16 (a) I	Biodiversity sensitive areas	✓				Not material
ESRS 2 SBM-3 E4	16 (b)	Land degradation, desertification, or soil sealing	✓				Not material
ESRS 2 SBM-3 E4	16 (c)	Threatened species	✓				Not material
ESRS E4-2	24 (b)	Sustainable land / agriculture practices or policies	✓				Not material
ESRS E4-2	24 (c)	Sustainable oceans/seas practices or policies	✓				Not material
ESRS E4-2	24 (d)	Policies to address deforestation	✓				Not material
ESRS E5-5	37 (d)	Non-recycled waste	✓				p. 76
ESRS E5-5	39	Hazardous waste and radioactive waste	✓				No data yet
ESRS 2 SBM-3 S1	14 (f)	Risk of incidents of forced labour	✓				p. 80
ESRS 2 SBM-3 S1	14 (g)	Risk of incidents of child labour	✓				p. 80
ESRS S1-1	20	Human rights policy commitments	✓				p. 81-82
ESRS S1-1	21	Sustainability due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			✓		p. 81-82
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	✓				p. 82
ESRS S1-1	23	Workplace accident prevention policy or management system	✓				p. 81

Disclosure requirement	Data point		SFDR	Pillar 3	Benchmark Regulation	EU climate law	Page/relevance
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	✓				p. 85
ESRS S1-14	88 (b), (c)	Number of fatalities and number and rate of work-related accidents	✓		✓		p. 100
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities or illness	✓				p. 100
ESRS S1-16	97 (a)	Unadjusted gender pay gap	✓		✓		Not material
ESRS S1-16	97 (b)	Excessive CEO pay ratio	✓				Not material
ESRS S1-17	103 (a)	Incidents of discrimination	✓				p. 101
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	✓				p. 101
ESRS 2 SBM-3 S2	11 (b)	Significant risk of child labour or forced labour in the value chain	✓				p. 102
ESRS S2-1	17	Human rights policy commitments	✓				p. 103
ESRS S2-1	18	Policies related to value chain workers	✓				p. 103
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	✓				p. 103
ESRS S2-1	19	Sustainability due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8					p. 103
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	✓				Not yet reported
ESRS S3-1	16	Human rights policy commitments	✓				Not material
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	✓				Not material
ESRS S3-4	36	Human rights issues and incidents	✓				Not material
ESRS S4-1	16	Policies related to consumers and end-users	✓				Not material
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	✓				Not material
ESRS S4-4	35	Human rights issues and incidents	✓				Not material
ESRS G1-1	10 (b)	United Nations Convention against Corruption	✓				Not applicable
ESRS G1-1	10 (d)	Protection of whistleblowers	✓				p. 112-113
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery laws	✓				p. 115
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	✓				Not applicable

Sustainability  
report 2024



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