




Sustainability  
Report  
**2021**



We firmly believe  
that sustainable  
development  
is the only method  
for success.

**FLEXOPACK**

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# Message from Chief Executive Officer



For FLEXOPACK Group, Sustainable Development constitutes a strategic priority and a key goal.

The Group's 2021 Sustainable Development Report, for the 3rd consecutive year, presents our strategy and performance in detail. Consistent with its values, the Group continued to grow guided by the basic principles of Sustainable Development.

The enhancement of circular economy model applied constitutes a priority for us and in this context we have continued to implement practices in our products in this direction, focusing on reducing the use of non-renewable natural reserves consumed in the production process, increasing the utilization of recyclable materials but also on the ecological design of our products.

The structure of the Report is based on the guidelines of the Global Reporting Initiative in accordance with the GRI Standards, of the Athens Stock Exchange (ATHEX) and those defined in the Sustainable Development Goals of the United Nations.

**Stamatis Ginosatis**

Flexopack CEO



## For the economy

2021 was a very demanding year globally, with the main characteristic being the effort to disengage from the global health crisis. The economic effects of the pandemic continued to affect the global economy and as a result all large and even smaller industries. Despite all this, our Company responded immediately to the intense challenges of the market, achieving the maintenance of profitability, with the extension of its extroversion oriented towards the development of new sustainable products. Up to date, Flexopack has filed and secured around 50 patents internationally owned by the company.

“ Alongside with the challenges of the pandemic, the challenges related to climate change, environmental protection and proper corporate governance were further highlighted.”

## For the society

With more than 450 employees across the Group, whose success is directly linked to the achievements of its human resources, we continuously promote a system that recognizes and rewards high performance, empowering our employees and providing the framework for the attraction, participation and retention of human resources.

We seek and cultivate a culture of health and safety for our employees in all activities and especially in those related to the operation of production facilities. In the context of the requirements and changes brought about by the health crisis, the Group throughout the pandemic observed and continues to observe all the necessary measures to protect the health and safety of its employees, third parties and partners, while ensuring the smooth and continued operation of production.

## For the environment

At FLEXOPACK Group we are constantly in the process of trying to reduce our environmental footprint, aiming to save energy and natural resources and setting high goals for the coming years.

In the context of constant communication with customers, suppliers and all our stakeholders, but also in the continuous effort for innovative solutions, we redesign many of our products in order to increase their recyclability as much as possible, we seek to use higher percentages of recycled raw materials, while at the same time through the quality of our packaging we contribute to the reduction of food waste.

At FLEXOPACK Group we remain true to our commitment towards our people, the environment, the economy and society and we operate with business ethics and in accordance with the regulatory framework.

Our achievements up to date constitute the most essential legacy for the future, which presents a large series of challenges that are constantly increasing, but to which we must respond. Today it is more obvious than ever that Sustainable Development as a cornerstone of business strategy is a one-way direction.



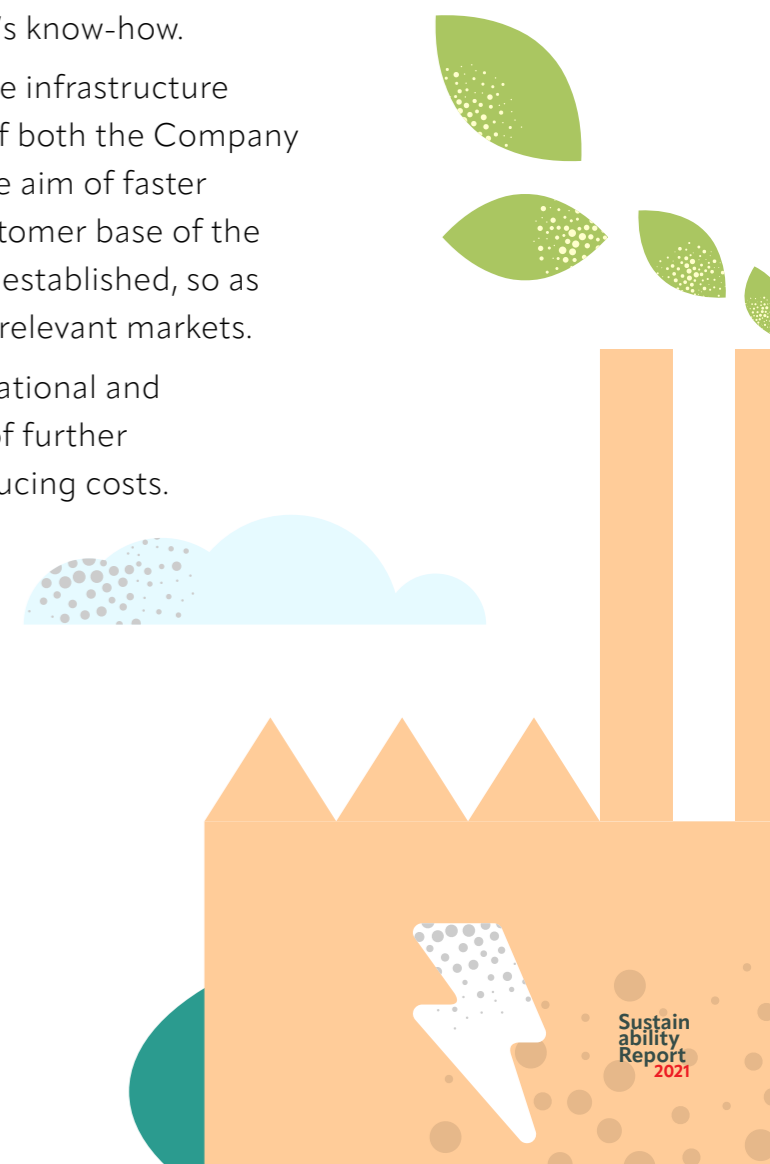
The Group promotes and implements a policy that focuses on the following axes:

- Demonstration of preparedness to deal with emergency situations.
- Implementation of emergency prevention, detection and management procedures.
- Design and construction of facilities that aim at the greatest possible energy savings.
- Frequent maintenance, continuous renewal and upgrading of the mechanical equipment used, so as to leave a low energy footprint.
- Continuous information, training and strengthening of staff awareness on climate change issues.
- Integration into the recycling and alternative packaging management system, in order to prevent the creation of waste packaging and the reuse, recycling and substantial utilization of these.
- Selection of recyclable, if possible, raw materials with the smallest possible energy footprint.
- Application of technologies for the reduction of direct and indirect greenhouse gas emissions from energy consumption.
- Monitoring on the followed policy by the Group's suppliers regarding the implementation of procedures for dealing with climate change and use of renewable energy sources as well as provision of relevant recommendations and suggestions, where this is deemed necessary.
- Building relationships of trust with the local communities in which the Group develops its activities and continuous care in order to minimize the inconvenience caused.



In continuation to the above, the Group's strategy, which has an orientation of flexibility and continuous adaptation to the changing conditions, is summarized in the following:

- Improvement and continuous upgrading of the manufactured products, with an emphasis on their qualitative differentiation in relation to the competition.
- Creation of new, innovative products capable of meeting the broadest and most demanding needs of the market and responding to the desires and needs of customers.
- Perfection of existing modern production methods, with the aim of reducing energy consumption and carbon footprint as well as substantial contribution to sustainable development.
- Further enhancement of foreign markets through maintaining the partnerships that the Company has already developed and their further expansion with the aim of exploiting the Group's know-how.
- Further effective strengthening of the infrastructure and production bases and facilities of both the Company and the Group's subsidiaries, with the aim of faster and more efficient service to the customer base of the geographical areas in which they are established, so as to be a springboard of growth in the relevant markets.
- Continuous improvement of organizational and operational structures with the aim of further increasing efficiency and further reducing costs.



# 2021 at a glance

**5**  
factories  
around the world



**90,2%**  
waste  
recycling

sales  
**€114,18**  
million



use **100 tons**  
recycled plastic

Replacement of 50% of the virgin raw material with recycled, to a large product category

**50**  
patents



**€17.000**  
for education  
of employees

**7**  
distribution  
centres



**33%**  
women  
in the B.o.D.

selling  
in **45**  
countries



**449**  
employees  
Greece, Poland, Australia



# Getting to know Flexopack



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## Production units & Distribution network

FLEXOPACK SOCIÉTÉ ANONYME COMMERCIAL AND INDUSTRIAL PLASTICS COMPANY (hereinafter FLEXOPACK), was established in 1979 with facilities in Koropi, Attica. The Company is a manufacturer of flexible packaging materials offering a wide variety of products, with particular emphasis on the production of co-extrusion films with oxygen permeability properties. The Company has a strong technical base in extrusion, vacuum pouches manufacturing and printing.

FLEXOPACK's main market is the food industry, with an emphasis on meat, poultry, cheese and fish. Other markets include the printing/converting industry and personal care product packaging.

“ The company has 5 production factories - 3 in Greece, 1 in Poland and 1 in Australia - 7 distribution centers around the globe and it has developed a worldwide sales and distribution network, offering high quality service to its partners. ”



[GRI 2-1, GRI 2-2, GRI 2-6a]

## Subsidiaries

### FLEXOPACK POLSKA SP. Z O.O.

The Company is located in Malbork, Poland, in the Gdansk region, and has a large production facility.

### FLEXOSYSTEMS LTD BELGRADE

Flexopack S.A. proceeded to the establishment of the Company Flexosystems Ltd Belgrade, based in Belgrade, Serbia, with the aim of distributing, promoting and marketing all products in the Serbian market.

### FLEXOPACK INTERNATIONAL LTD

Flexopack International Limited was founded in Larnaca, Cyprus and it constitutes the holding company of FLEXOPACK's development in foreign markets.

### FLEXOPACK PTY LTD

The Company was strategically established in Australia in line with the Group's intention to further strengthen the supply chain in Australia and New Zealand.

### FLEXOPACK PROPERTIES PTY

The Company currently has no commercial activity and the reason for establishing this legal entity is explained by the Group's intention to expand its current manufacturing activity in Australia.

### FLEXOPACK NZ LTD

Flexopack NZ Ltd is based in Auckland, New Zealand and is engaged in the wholesale distribution of Flexopack products in New Zealand.

### FLEXOPACK TRADE AND SERVICES UK LTD

The Company was established as part of the Group's intention to further strengthen the supply chain in the UK and Ireland and to expand the Group's presence overseas.

### FLEXOPACK FRANCE S.A.R.L.

FLEXOPACK FRANCE was founded in Lyon. Its establishment is part of the upgrade of the global distribution and sales network of the Group's products and aims to further strengthen and substantially expand its presence in the specific geographic territory.

### FLEXOPACK USA INC

The Company is commercial, based in the State of Delaware, USA. and its establishment is part of the Group's strategy to strengthen the global distribution network of its products.

### FLEXOPACK IRELAND LTD

The Company is a commercial company based in Dublin, Republic of Ireland. Its establishment is part of the wider strategic planning of the Group and aims to further strengthen and substantially expand its presence in the Irish market.

### FLEXOPACK DENMARK APS

The Company is a commercial company based in Copenhagen, Denmark, and its establishment is part of the wider strategic planning of the Group for the upgrade of its global distribution and sales network. More information is available in the Annual Financial Reports.





# Timeline



<p><b>Founding Flexopack</b> Koropi - Greece</p>	<p><b>1979</b></p>	<p><b>2016 2018</b></p>	<p><b>Greece-Poland</b> New investment plan for building &amp; production facilities</p>
<p>Listing at <b>Athens Stock Exchange</b></p>	<p><b>1996</b></p>	<p><b>2018</b></p>	<p><b>Greece</b> <b>3rd production facility</b> Opening of a new state-of-the-art factory</p>
<p><b>Greece</b> <b>New production facility</b> Unit B, Koropi</p>	<p><b>2000</b></p>	<p><b>2019 2020</b></p>	<p><b>Greece</b> <b>Poland-Australia</b> New capital investments in production capacity</p>
<p><b>Poland</b> Completion of new building &amp; mechanical investment</p>	<p><b>2015</b></p>	<p><b>2020</b></p>	<p><b>Greece</b> Purchase of land for construction of 4th factory</p>
<p><b>Greece-Koropi</b> Launch of new Application Center</p>			<p><b>USA</b> Establishment of commercial subsidiary</p>
<p><b>Australia</b> <b>New production facility</b> Brisbane</p>			

[GRI 2-6 d]

## Our values

Our aim is to offer products of high standards and high quality through continuous research. Since the establishment of the Company until today, we faithfully serve two fundamental values:

### Quality & Reliability

## Our vision

- To dominate into a dynamic global market that requires exceptional flexibility.
- To effectively meet the overall needs of the flexible packaging market.
- To create the working environment in which our people join, train and develop with respect for values and confidence in their capabilities.
- To anticipate and meet the constant challenges for new and innovative packaging solutions.
- To grow profitably, be results-driven and use the latest technology, implementing a strong strategic plan.

## Business model

The business model<sup>1</sup> of FLEXOPACK presents the system of converting the available resources used by the Company, through the sectors of its business activity, into products and services which it produces, distributes and manages with positive or negative impacts, with the aim of fulfilling its strategic objectives and creating sustainable value for stakeholders, the natural environment and the wider society and economy.

In the context of the application of the business model, the main performance indicators are presented, as well as the description of the interaction of the resources used by the Company.

The business model of FLEXOPACK aims to create value for all social partners, namely employees, shareholders, customers, suppliers and the wider society.

<sup>1</sup> More information is available in the Annual Financial Report, page 29-32.



# Business model

## 01 RESOURCES

**FINANCIAL**

 Creating economic value through business activity and investments of equity and debt

**INDUSTRIAL**

 Providing high quality products and services, with 5 factories and 7 distribution centers around the world and exporting products to 45 countries

**HUMAN**

 Confidence in capabilities and respect for the values of the 350, direct and indirect employees and executives who contribute to the development of the company

**NATURAL**

 Manage natural reserves, virgin plastic granules and disposable packaging materials\*, responsibly and efficiently

**SOCIAL**

 Reputation, social contribution and relationships of trust with interested parties

**INTANGIBLE**

 Intellectual property, 50 patents, research and development for innovative products and know-how to optimize processing of scrap plastic

INFLOWS

## 02 OPERATION

**VISION - MISSION - CORPORATE VALUES**

The vision of FLEXOPACK to continue to constitute one of the most important Greek Companies with a strong international presence and parallel contribution to Sustainable Development

**THE COMPANY**

Production of flexible plastic packaging items intended mainly for the food industry.

- Sales
- Supply Chain
- Research & Development (R&D)
- Information Technology Systems (IT)
- Human Resources
- Quality Assurance

**COMPETITIVE ADVANTAGES**

- Model research and development center, staffed with specialized scientists with high technical know-how.
- State-of-the-art mechanical equipment.
- Faithful and uninterrupted compliance with strict policies, procedures and quality standards.
- Optimizing the environmental performance of manufactured products.

## 02 OPERATION



## 03 RESULTS

**ECONOMY**

**Direct economic value** (in euro)

- Employee compensation and benefits
- Total investments

**Indirect economic value**

- Number of job positions created in the supply chain

**Regulatory compliance and business ethics**

- Incidents of corruption and bribery

**ENVIRONMENT**

**Atmosphere - Air quality**

- % air quality changes as a result of special measurements

**Climate - Impact of operation on climate change**

- Emissions CO2 (Scope 1&2)

**Ground - Solid wastes**

- Total amount of waste recycled, reused or utilized during the production process

**Natural reserves of raw materials**

- % of recycled raw material in the packaging

**SOCIETY**

**Employment**

- % of employees from the local community

**Innovation - Development of knowledge & technology (R&D)**

- Investments in research and development

**Training**

- Man-hours of training for the development of the skills of the direct employees

**Health- Safety - Well-being**

- Total recorded accidents per working hours

## 04 IMPACTS

CONTRIBUTING TO THE GLOBAL TARGETS FOR SUSTAINABLE DEVELOPMENT

 1

 2

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 13

 14

 15

 3

 4

 5

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\* Pallets, tapes, cartons stretch etc..

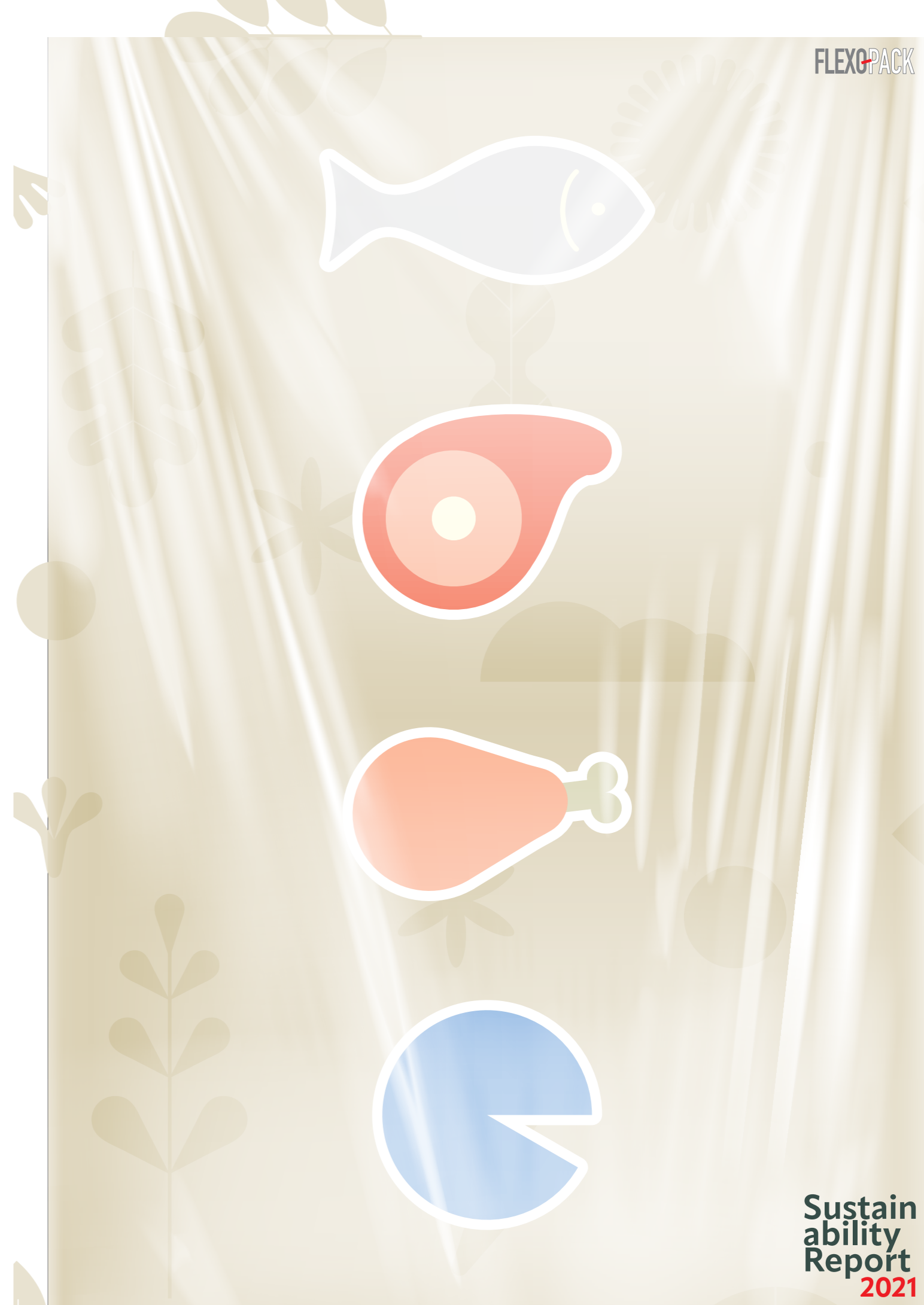


## Our products

Flexopack manufactures the world's most advanced flexible food packaging materials.

The categories of them are following:

- FlexoShrink™  
Shrink bags and films
- Flexion™  
Skin Films
- FlexoFresh™  
Thermoforming films
- FlexoLid™  
Lidding films
- FreshOnBoard™  
Cardboard-based trays
- MonoFresh™  
Monomaterial thermoforming films
- Vacuum pouches
- Customized film structures





## Our supply chain

Responsible supply chain management aims at the timely recognition of business opportunities and the management of potential risks.

In this context, the Company systematically assesses the risks that threaten its business model and aims to continuously improve the processes related to its suppliers. FLEXOPACK has procurement departments to ensure more efficient supply chain management.

It is noted that in recent years there have been no significant changes in the main suppliers of FLEXOPACK.

The main categories of suppliers with which Flexopack cooperates are:

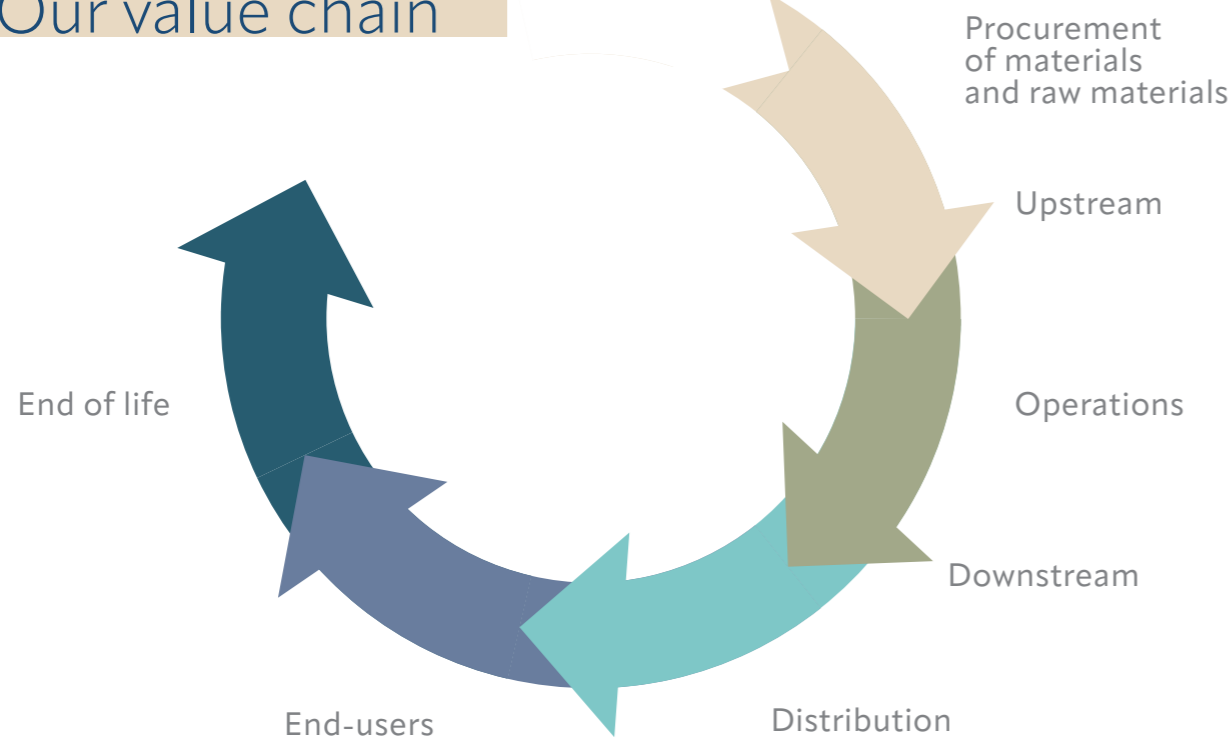
- Suppliers of raw materials
- Suppliers of other categories
- Energy providers
- Services providers

Percentage of monetary value spent on local suppliers\*

Greece	Poland	Australia
<b>23.7%</b>	<b>29.3%</b>	<b>14.0%</b>

\* Local suppliers are considered to be suppliers located within the country where the Company's facilities are based. The low percentages are due to the fact that some raw materials cannot be produced in the respective country.

## Our value chain



### Upstream

Procurement  
**Raw materials\***  
 virgin plastic in granule form  
**Consumable packaging materials**  
 pallets, tapes, cartons, stretch film etc.  
**Energy**  
 Natural gas  
 Electric energy  
**Services**  
 Life insurances, Medical care, Transportation companies\*\*

### Activities

Operations  
**Production**  
**Business Development (BD)**  
**Sales**  
**Research & Development (R&D)**  
**Information Technology Systems (IT)**  
**Human resources**  
**Quality assurance**

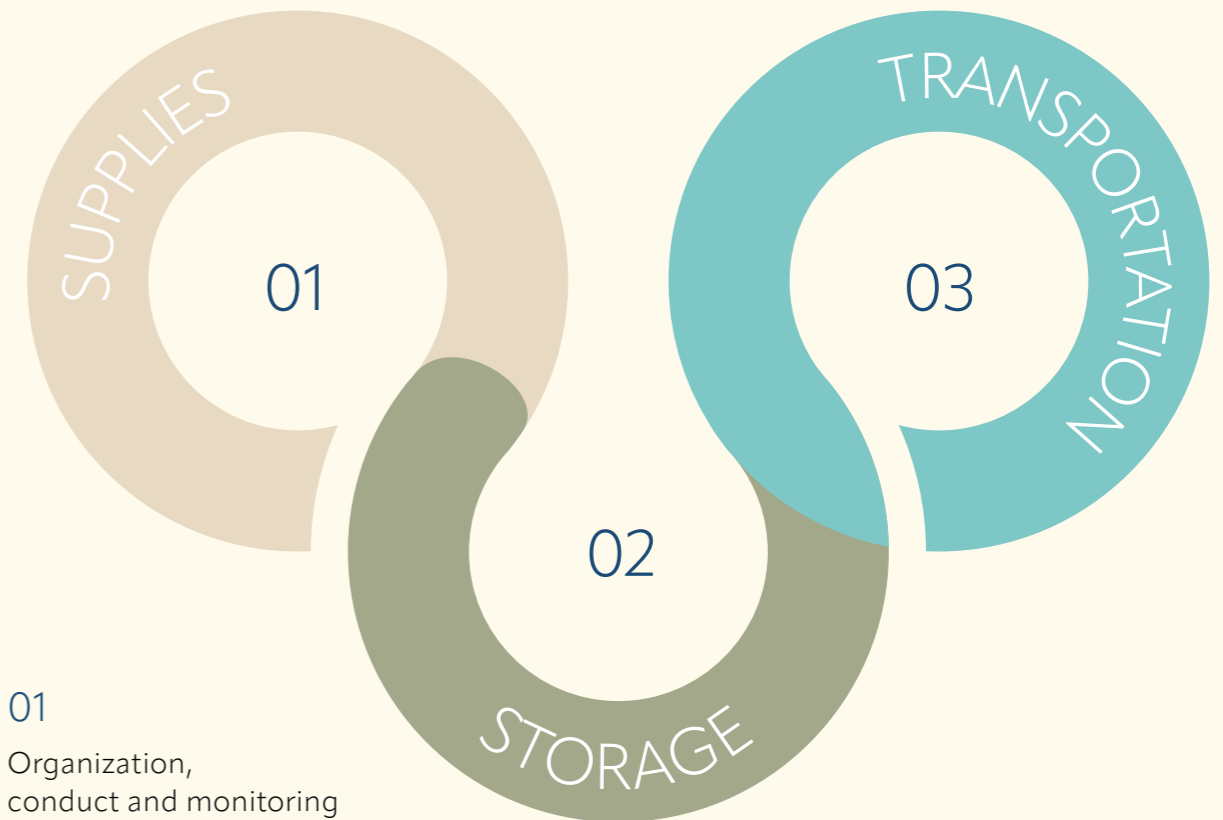
### Downstream

Distribution of finished products  
**Transportation companies**  
**Food industries**  
**Food hyper-markets**  
**Agents**  
**Final consumers / End-users**

\* FLEXOPACK does not procure hazardous raw materials.

\*\* 90% of the exports from Greece covers almost all continents with all modes of transport.

According to the regulation of operation, the Supply Chain Directorate is responsible for the following main ones activities:



### 01

Organization, conduct and monitoring the procurement of raw materials, auxiliary materials, consumables, packaging materials and services  
 Completion of spare parts and machines' purchases as instructed by the technical department  
 Monitoring of purchase contracts and annual purchase discounts  
 Submitting statistics to the factory departments

### 02

Physical and systematic processing of inventories  
 Inventory records and control  
 Inventory management in collaboration with other departments of the factory

### 03







Implementation and supervision of products and goods' pricing in their circulation, in the domestic market and abroad



## Selection of suppliers

The Company ensures effective cooperation with suppliers by clearly communicating the terms of cooperation and evaluates them based on approved criteria (qualitative and quantitative) in order to ensure that the selected partners/suppliers have the necessary know-how, as well as the ability to perform the assigned services. 90% of the suppliers are based in Europe (Greece, Spain, Belgium, Germany, France) and the remaining 10% outside Europe. In recent years, there have been no significant changes in the Company's main suppliers.

### Prospective suppliers are evaluated based on the following criteria:

-  Credibility, reputation and market position
-  Cost and quality comparison
-  Flexibility and expertise (R&D, after-sales)
-  Experience with many years of presence in the field
-  Delivery time and quality (on-time delivery and defect rate)
-  Certifications according to recognized international and community standards (per country of activity).

The Company takes into account basic criteria related to the activity of suppliers when entering into cooperation with them, such as for example annual reports (Sustainable Development Reports) published by suppliers and other criteria related to the sustainability of raw materials. In addition, the Company is considering incorporating specific environmental, social and governance criteria to evaluate suppliers in order to have a holistic view of suppliers' performance before and during the partnership. It is noted that in recent years there have been no significant changes in the main suppliers of FLEXOPACK.

FLEXOPACK is a member of the Non-Profit Organization SEDEX, which is related to the management of social and environmental risks in supply chains. The platform is used by more than 40,000 members in over 150 countries.

## Partnerships, participations, distinctions



FLEXOPACK is member of CEFLEX, of a European consortium of companies representing the entire flexible packaging value chain.



FLEXOPACK is also member of AGMPM (Association of the Greek Manufacturers of Packaging and Materials) and participates in the Sustainability Committee.



FLEXOPACK PTY (Australia) is a member of the initiative of Australian Packaging Covenant (APCO) and RedCycle.



FLEXOPACK Trade & Services UK is a member of On Pack Recycling Label (OPRL).

FLEXOPACK participated in international packaging exhibitions in 2021, such as PACK EXPO Las Vegas and CFIA Rennes.

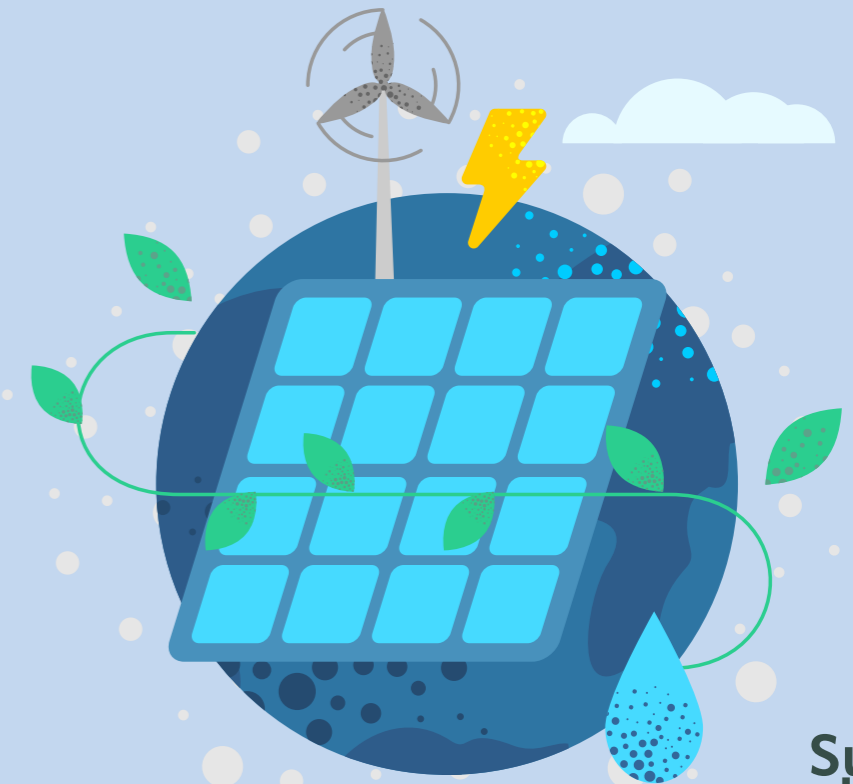
In addition, the Group in 2021 received for the ninth consecutive year the distinction "TRUE LEADER 2020" in ICAP awards.

# Our approach for Sustainable Development



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“FLEXOPACK recognizes that the full integration of Sustainable Development into its business strategy presupposes relationships of trust with its stakeholders and is based on consultation with them.”

## Cooperation with the stakeholders

The Company considers as stakeholders the natural and legal persons who influence and are affected or are likely to be affected by its business decisions and activities.

FLEXOPACK invests in continuous and two-way communication with each group of stakeholders, understanding the importance of this communication for obtaining the necessary information to improve its actions. The role and views of FLEXOPACK’s stakeholders are key elements that fuel its effort to improve its products, as well as its sustainable operation and development.

In the context of the materiality analysis that took place in 2022, regarding the potential and existing impact of the Company on the environment, people, including their human rights, and the economy for the reference year (2021), it proceeded with the identification, evaluation and prioritization of its stakeholders, with the main criterion being the extent to which they are affected or may be affected by the Company’s activities.

Subsequently, the main characteristics that distinguish our stakeholders are presented, such as the categories they belong to, their main topics of interest for the year 2021, the methods and frequency of consultation with them.

## Stakeholder mapping

KEY STAKEHOLDER GROUPS	COMMUNICATION CHANNEL	FREQUENCY OF COMMUNICATION
SHAREHOLDERS INVESTORS CAPITAL PROVIDERS	<ul style="list-style-type: none"> <li>• General Assembly of Shareholders</li> <li>• Presentation to analysts</li> <li>• Financial review report</li> <li>• Report on Sustainable Development</li> <li>• Group’s Website (Press releases)</li> </ul>	Annual Continuous
BOARD OF DIRECTORS	<ul style="list-style-type: none"> <li>• Board of Directors’ Meetings</li> </ul>	Continuous
SUPPLIER, BUSINESS PARTNERS & SERVICES PROVIDERS	<ul style="list-style-type: none"> <li>• Department of procurement</li> <li>• Regular contacts/visits with/to suppliers and partners</li> <li>• Sustainable Development Report</li> <li>• Social Media</li> </ul>	Continuous
CLIENTS	<ul style="list-style-type: none"> <li>• Participation in international exhibitions</li> <li>• Group’s website</li> <li>• Sustainable Development report</li> <li>• Social Media</li> </ul>	Continuous
EMPLOYEES	<ul style="list-style-type: none"> <li>• Regular meetings and announcements/Events</li> <li>• Group’s Website</li> <li>• Social Media</li> </ul>	Continuous
STATE & GOVERNMENT AGENCIES _ Ministries _ Organizations, _ Regulatory authorities	<ul style="list-style-type: none"> <li>• Consultation with State representatives and institutional bodies at national and/or regional level</li> <li>• Conferences and events</li> <li>• Corporate publications and articles</li> <li>• Financial Review</li> <li>• Sustainable Development Report</li> <li>• Social Media</li> </ul>	Continuous
BUSINESS COMMUNITY _ Business Associations _ Companies of the segment	<ul style="list-style-type: none"> <li>• Conferences, bodies, business associations</li> <li>• Corporate publications, articles</li> <li>• Group’s website</li> <li>• Sustainable Development Report</li> <li>• Social Media</li> </ul>	Annual
SOCIETY & GROUPS OF LOCAL COMMUNITIES _ MEDIA _ Social Organizations _ Local Authorities	<ul style="list-style-type: none"> <li>• Communication channels</li> <li>• Communication with local government bodies, local institutional bodies and associations</li> <li>• Studies and corporate reports]</li> <li>• Sustainable Development Report</li> </ul>	Annual
NON-GOVERNMENTAL ORGANIZATIONS (NGO)	<ul style="list-style-type: none"> <li>• Sustainable Development Report</li> <li>• Social Media</li> </ul>	Annual

## Materiality Analysis

### Our approach for materiality analysis

The Company, adopting the new methodology of the international GRI Standards (GRI Standards 2021), proceeded to the recognition, evaluation, prioritization and validation of its positive and negative, existing and potential impacts on the environment, human, including his/her human rights, and the economy. Through the prioritization of the recognized impacts, the essential Sustainable Development issues for the Company were defined.

Our approach to materiality analysis for the accounting period 2021, it was carried out through the following four stages:

### > 01

#### Understanding operation framework

- ▶ **Business model overview (internal environment):**  
 Understanding the business model and business relationships, through a review of documents and available relevant material (for example sectoral sustainability criteria: GRI, ESG, ATHEX ESG).
- ▶ **Understanding business relationships**
- ▶ **Understanding the sustainable development framework in which the Group operates**
- ▶ **Understanding the company's stakeholders**

### > 02

#### Impact recognition

- ▶ **Identification and recognition of positive and negative (existing and potential) impacts on:**  
 environment, human, including of human rights, and the economy, as they arose from the operation and business relations of the Company, while they were highlighted as important by sectoral Sustainable Development standards, sectoral criteria of assessment bodies and similar organizations.

### > 03

#### Impact assessment

- ▶ **Conduct materiality analysis research:**  
 Through research conducted where the groups of stakeholders participated with whom the Company consults issues of their competence, regarding the environmental and economic-social impacts.
- ▶ **Evaluation criteria:**  
 The evaluation of the existing and potential positive impacts was carried out using the criteria of scale, scope and likelihood, while the evaluation of existing and potential negative impacts was conducted based on scale, scope and irremediable character and likelihood.
- ▶ **Collection and analysis of answers:**  
 After the completion of the research, collection and analysis of the answers took place, so as to define the outcomes of the impacts' assessments.

### > 04

#### Impacts' prioritization

- ▶ **Mapping impacts to sustainable development issues:**  
 Following the determination of the outcomes from the impacts' assessment, the impacts were ranked in order of importance and grouped into sustainable development issues
- ▶ **Materiality threshold:**  
 Subsequently, a threshold was set by the Management of the Group, based on which an issue of sustainable development was characterized as material, as it is presented in the following matrix.
- ▶ **Validation of the list of material issues:**  
 Finally, the list of material issues was completed and validated by the Group's Management and the content of this Report was determined.



### Our impact on environment, economy, society.



The following tables present all of the impacts assessed and the outcomes of the materiality analysis for 2021.

AREA OF IMPACT	POSITIVE IMPACTS (Current and Potential)
<b>ENVIRONMENT</b>	
ATMOSPHERE	Improvement of the air quality
GROUND	Protection of the ground
NATURAL RESERVES OF RAW MATERIALS	Maintaining natural reserves of raw materials
CLIMATE	Climate change mitigation and adaptation
WATER	Protection of water reserves
<b>SOCIETY</b>	
EMPLOYMENT	Contribution to employment
INNOVATION	Contribution to the development of knowledge, art and technology
TRAINING	Contribution to the creation of opportunities that promote training and development
DIVERSITY AND EQUAL OPPORTUNITIES	Defending human rights, promoting diversity and ensuring equal opportunities for all
HEALTH, SAFETY, WELL-BEING	Protection and promotion of physical, mental and social health and well-being
PROTECTION OF PERSONAL DATA	Ensuring the protection of personal data
<b>ECONOMY</b>	
REGULATORY COMPLIANCE & BUSINESS ETHICS	Ensuring regulatory compliance and business ethics
INDIRECT ECONOMIC VALUE	Creating indirect economic value
DIRECT ECONOMIC VALUE	Creating direct economic value

AREA OF IMPACT	POSITIVE IMPACTS (Current and Potential)
<b>ENVIRONMENT</b>	
ATMOSPHERE	Causing air pollution
GROUND	Soil contamination
NATURAL RESERVES OF RAW MATERIALS	Exhaustion of raw materials' natural reserves
CLIMATE	Impacts of operation on climate change
WATER	Pollution and depletion of water reserves
BIODIVERSITY & ECOSYSTEMS	Disruption of biodiversity and ecosystems
<b>SOCIETY</b>	
EMPLOYMENT	Reduced recruitment and low rate of staff retention
INNOVATION	Reduced contribution to the development of knowledge, art and technology
TRAINING	Reduced contribution to training and development
DIVERSITY & EQUAL OPPORTUNITIES	Diminished contribution to the defense of human rights, promotion of diversity and ensuring equal opportunities for all
HEALTH, SAFETY, WELL-BEING	Reduced contribution to the protection of physical, mental health and social well-being
PROTECTION OF PERSONAL DATA	Insufficient protection of personal data
<b>ECONOMY</b>	
REGULATORY COMPLIANCE & BUSINESS ETHICS	Poor regulatory compliance and business ethics
INDIRECT ECONOMIC VALUE	Poor or negative indirect economic value

In addition, two issues emerged that have not been identified as material through the materiality analysis for 2021, but were selected by the Group Management to be included and analyzed in this Report as they are essential issues for the Company's Strategy and operation.

The issues are the following:

-  Creation of economic value (direct and indirect)
-  Ensuring regulatory compliance and business ethics







### Threshold matrix of material issues

	WHY THE ISSUE IS MATERIAL	WHO ARE BEING AFFECTED BY THE IMPACTS
Material issue	Wider economic, social and/or environmental impacts caused	Stakeholders being affected

#### POSITIVE IMPACTS

Improvement of the air quality		Board of Directors Shareholders, investors, capital providers Suppliers, business partners and services providers
Protection of the ground	 	Shareholders, investors, capital providers Board of Directors Employees
Maintenance of the natural reserves		Shareholders, investors, capital providers Board of Directors Employees
Contribution to employment	 	Shareholders, investors, capital providers Board of Directors Employees
Contribution to the development of knowledge, art and technology	 	Shareholders, investors, capital providers Board of Directors Employees
Contribution to the creation of opportunities that promote training and development	  	Suppliers, business partners and services providers Clients, Employees

#### NEGATIVE IMPACTS

Exhaustion of raw materials' natural reserves		Shareholders, Investors, Capital providers, Board of Directors Employees
Impacts of operation on climate change		Shareholders, Investors, Capital Providers Board of Directors Employees

	THRESHOLD OF IMPACT	WHO CAUSES THE IMPACTS
Stakeholders outside FLEXOPACK that may cause or be linked with the impacts of the issue	Causing of impact from FLEXOPACK	Material issue

#### POSITIVE IMPACTS

Society- local community groups Suppliers, business partners and services providers Shareholders, Investors, Capital providers, Clients	✓	Improvement of air quality
Society- local community groups Suppliers, business partners and services providers Shareholders, Investors, Capital providers, Clients	✓	Protection of the ground
Society- local community groups Suppliers, business partners and services providers Shareholders, Investors, Capital providers, Clients	✓	Maintenance of raw materials' natural reserves
Suppliers, business partners and services providers Society- local community groups Business community	✓	Contribution to employment
Suppliers, business partners and services providers Society- local community groups Business community	✓	Contribution to the development of knowledge, art and technology
Society- local community groups Business community	✓	Contribution to the creation of opportunities that promote training and development

#### NEGATIVE IMPACTS

Society- local community groups Suppliers, business partners and services providers Shareholders, Investors, Capital providers, Clients	✓	Exhaustion of raw materials' natural reserves
Society- local community groups Suppliers, business partners and services providers Shareholders, Investors, Capital providers, Clients	✓	Impacts of operation on climate change

# Our responsibility for the environment



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## Environmental management

The respect for the environment constitutes the basis of all FLEXOPACK activities. Recognizing the importance of our environmental responsibility, the Company's activity is based on the design and development of innovative products with the least possible impact on the environment.

FLEXOPACK takes seriously the environmental impact stemming from its products during their life cycle. Through research and technology, but also through the Environmental Policy applied by the Company, we develop products with a reduced environmental burden and the use of recyclable materials without compromising the quality of the product.

Specifically, in the context of environmental management, we focus on the following pillars:



-  **Natural reserves of raw materials:**  
we limit the use of virgin raw materials
-  **Ground:**  
we protect the environment with proper waste management
-  **Atmosphere and climate:**  
we reduce our carbon footprint during our production process

## Natural reserves of raw materials and ground







### Our approach

The Company during its operation creates or may create the following positive or negative impacts:




### Maintenance of raw materials' natural reserves

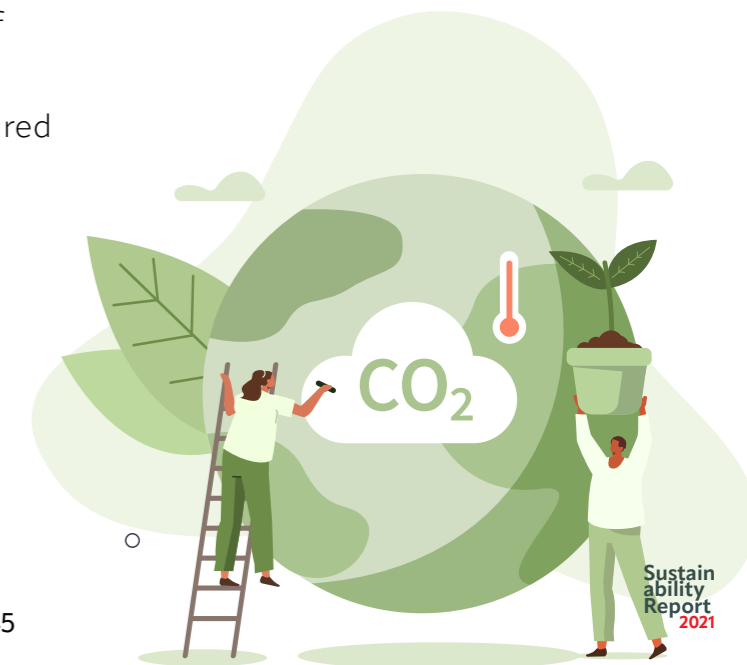
Positive impacts from:

-  the increase of recycled raw material's percentage in packaging products
-  the use of plastic from biological origin
-  the reduction of the thickness of flexible packages
-  the possible further increase in the recyclability of packaging and the reuse of production waste

### Exhaustion of raw materials' natural reserves

Negative impacts from:

-  the use of virgin plastic
-  the limited use of a percentage of recycled raw material
-  the inability to use the manufactured products of mechanical recycling in primary packaging



### Our contribution to the limited use of raw materials

Actions to limit as much as possible the use of virgin raw materials contribute significantly to our Company's competitiveness and environmental sustainability goals. The use of recycled materials constitutes a priority in order to reduce the corresponding use of primary raw materials.

### Key pillars of the Company in terms of Sustainable Development regarding the use of raw materials are:

- 01 Ensuring the packaging quality throughout its life cycle and, as a consequence, contributing to the reduction of food waste.
- 02 The use of appropriate technology and quality of raw materials in order to limit volume/weight of plastic in the final manufactured product (lighter packaging).
- 03 Recycling-friendly plastic packaging that is produced to be recycled in terms of the largest possible percentage of them.
- 04 The attempt to use recycled raw material, other than the primary raw material already in use.
- 05 The search and use of plastic raw materials which come from alternative biological sources (Bio Feedstock), the production of which is not at the expense of food production for consumption.
- 06 The replacement of plastic and the promotion of the food packaging containing paper at a significant percentage, in order to limit plastic.

As detailed in the graph, in order to support the main pillars, we have proceeded with a series of actions:

- We reduce the thickness of flexible packaging, without affecting the quality of our products. Limiting the use of materials in packaging has a double benefit, as it leads to a reduction in the weight of waste produced, but also to the limitation of the use of raw materials.
- We increase the recyclability of the packaging produced, in the context of the sustainability of our activity but also to meet the needs of the modern consumer. It is noted that the food industry, in which FLEXOPACK operates, basically uses multi-layer packaging, whose mechanical recycling possibilities are limited based on existing technology. The Company has included in its plans the greatest possible increase in the recyclability rate of the products, which always depends on the available recycling units and technologies in the areas where it operates. The Company monitors targeted indicators regarding the percentage of recyclability of products, compared to the corresponding percentages of past years.
- We increase the percentage of recycled raw material in our packaging, reducing as much as possible the use of non-sustainable materials.
- We adopt the use of plastic raw materials that come from alternative sources (Bio Feedstock), in the context of reducing the consumption of mineral resources and the impact of plastics on the environment in order to contribute to the transition to the Circular Economy. The Company has established measures according to its needs and which are in accordance with the global goals of Sustainable Development, ensuring the production and distribution of products that are sustainable alternatives with zero impact on the production of food for consumption.



## Production of sustainable products

Although the products manufactured by our Company require the extensive use of virgin plastic, we have prioritized the sustainability of our products. Globally, researches<sup>2</sup> show that less than 10% of plastic is recycled, which highlights the importance of replacing it with other, more environmentally friendly materials or the need to limit its use.

During the production process, the raw material resulting from mechanical recycling is usually not suitable for use in food packaging and, based on existing legislation, cannot be used in primary packaging applications. For some of our products and always considering customer requirements and specifications, we have proceeded to use recycled raw material from chemical recycling, which is suitable for such applications. However, chemical recycling is in its early stages worldwide and consequently there is limited access to such raw material.

In the cases where the Company uses plastic raw material from mechanical recycling, this always happens in consultation and according to the specifications of each customer and is currently used exclusively for the production of secondary packaging, where they do not come into direct contact with food.

<sup>2</sup> <https://www.oecd.org/environment/plastic-pollution-is-growing-relentlessly-as-waste-management-and-recycling-fall-short.htm>



## Our performance

During the production process, the Group does not intentionally use any of the 27 critical raw materials, for which there is a high supply risk, as recognized by the European Commission<sup>3</sup>.

FLEXOPACK used a total of 100 tons of recycled raw material<sup>4</sup>. The 96 tons constitute the product of mechanical recycling and 4 tons concern raw material that resulted from the chemical recycling process.

This quantity in particular is certified according to the ISCC Plus standard and its use constitutes the "definition" of the Circular economy, as it is the only type of recycled raw material that is allowed to be used in high added value applications such as primary food packaging.

	UNIT	GREECE
<b>RECYCLED MATERIALS</b>		
Plastic granules	t	<b>100</b>



<sup>3</sup> Critical raw materials (europa.eu)

<sup>4</sup> It is noted that the data for the countries Poland and Australia is not available for the year 2021. FLEXOPACK is in the process of data collection



## Ground

# Solid waste management










### Our approach

The Company during its operation creates or may create the following positive or negative impacts:


#### Protection of the ground

Positive impacts from:

-  the reuse of production waste
-  the reuse of packaging
-  the use of recycled raw material
-  the optimization of packaging that ensures the increase of packaged foods' life
-  the reduction of food waste
-  the potential increase in recyclability of packaging
-  replacing part of the plastic packaging with paper

#### Soil contamination

Negative impacts from:






-  the industrial activity and the production of packaging with a low recyclability index, which results in it being sent to landfill rather than recycling.

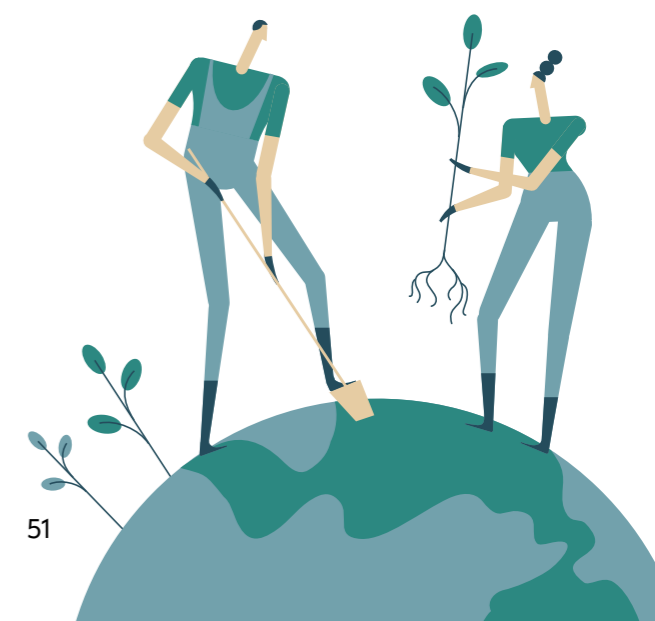
### Our policy

Soil protection and waste management constitute key priorities for the Company. At FLEXOPACK, we have established an Environmental Policy, within which we implement a Waste Management System that focuses on reduction, reuse and recycling, reducing the environmental impact of solid waste produced.

The above is achieved through more intensive monitoring of the proper final management of waste and through the establishment of strict criteria for the selection of the appropriate specialized waste manager, where it will be able to provide the most environmentally friendly management methods in each case.

More specifically, FLEXOPACK carries out the following waste management and monitoring procedures:

-  It annually records information related to waste management.
-  It is registered in the National Registry of Producers (NRoP).
-  Records the management of defective materials resulting from the production process.
-  Recycles and wherever possible reuses production waste that can be utilized for the production of new products.
-  It cooperates with specialized and licensed external partners, who undertake the collection, transportation and proper management of each category of waste from its facilities.



### Waste management process

As the use of plastic is an integral part of our production process, the goal of limiting the waste produced constitutes a priority for our Company.

“FLEXOPACK prioritizes the reuse of packaging and the utilization of by-products resulting from the production process of the production units, in any case where this is possible.”

Consequently, the Company limits the generated waste for management and at the same time reduces the need of non-renewable raw materials (virgin plastic) supply or other materials in the case of reuse.

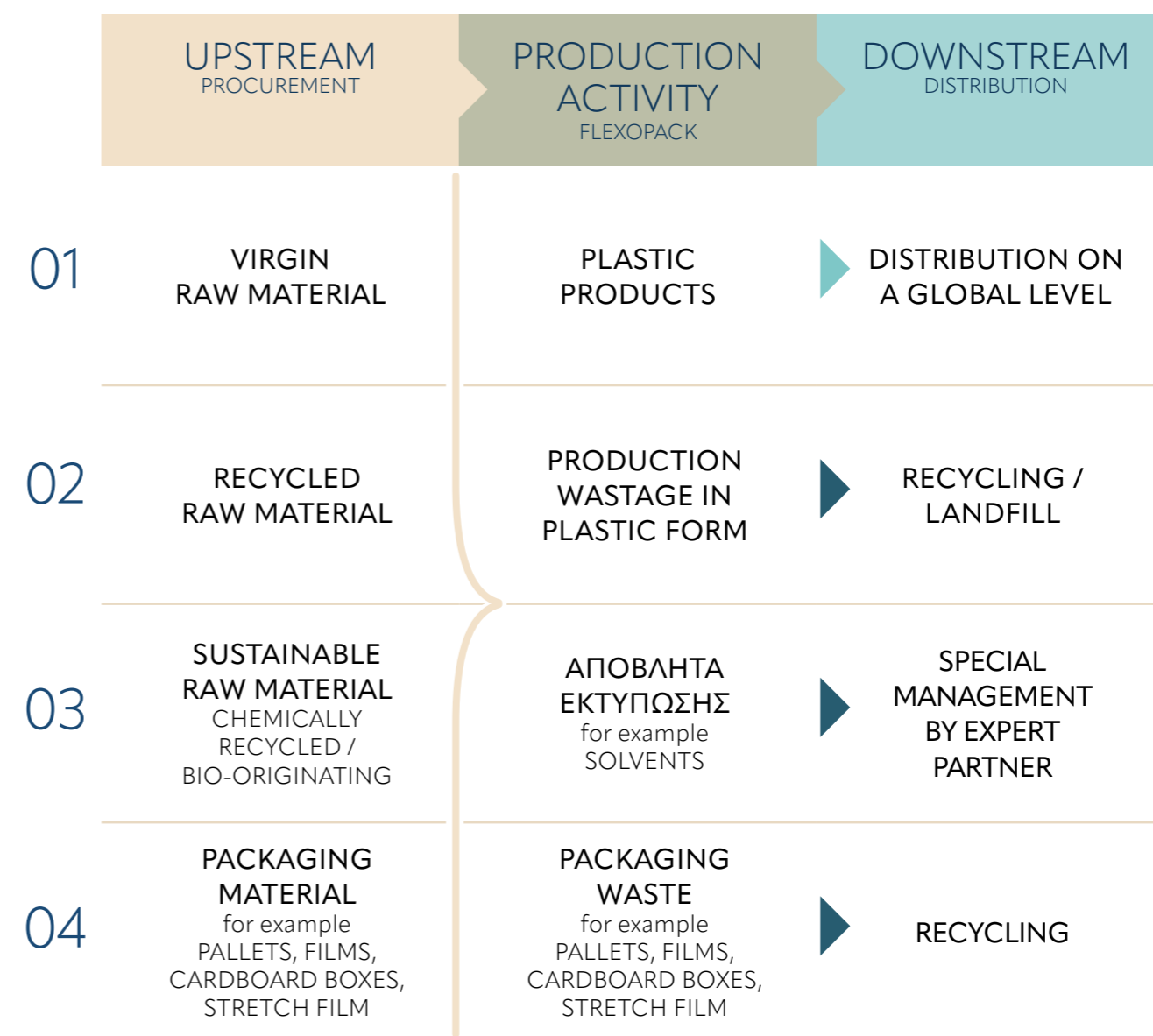
In order to achieve the reduction of our products' environmental footprint, having always the aim of maintaining the quality of our packaging, an effort is conducted to replace plastic in our packaging with paper, where this is possible, as well as continuous efforts are made to further reduce the weight of our packaging products, so as to limit the use of plastic raw material.

Also, a particularly important contribution of our products to the protection of the soil, is the optimization of packaging, through which we ensure a longer life of packaged food, actively contributing to the reduction of food waste which would otherwise (if it had been spoiled) be led to a sanitary landfill.

Specific and measurable targets to reduce waste, both in the production process and in end-use, reflect our commitment to protecting the environment and biodiversity. At the same time, we carry out systematic monitoring of the final waste management through our specialized partners.

In addition to packaging waste, we work with licensed hazardous waste management companies, which result from flexography, the printing system where inks and solvents are used, creating the unique hazardous waste that our Company produces. All waste produced is declared on an annual basis through the Electronic Waste Registry (EWR).

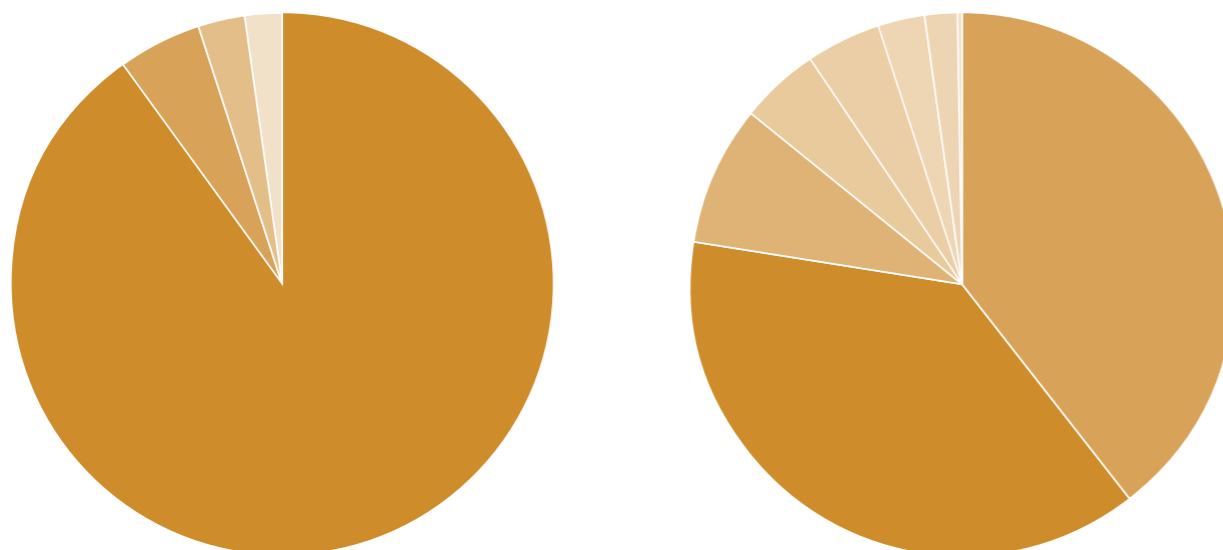
The diagram below shows the waste management process, from the initial stage of production, up to the final product.



### Our performance<sup>5</sup>

As the use of plastic is an integral part of our production process, the goal of limiting the waste generated constitutes a priority for our Company.

<sup>5</sup> It is noted that the data for the countries Poland and Australia is not available for the year 2021. FLEXOPACK is in the process of data collection.



PERCENTAGE OF WASTE BY TYPE OF TREATMENT

- 90,20% Recycling
- 2,78% Incineration (Fuel)
- 2,21% Preparation for re-use
- 4,81% Landfill

PRODUCED WASTE (t)

- 1,302.15 Plastic waste
- 1,264.42 Plastic packaging
- 272.5 Paper & cardboard packaging
- 158.79 Batteries
- 138.07 Wooden packaging
- 91.82 Inks
- 72.89 Iron & steel
- 0.12 Other waste

### Our targets

The main target of our Company is the further commercial promotion of products with increased rates of recyclability. This effort is directly linked to the achievement of the national goals as defined by the National Waste Management Plan (ESDA), which, specifically for plastic packaging, aim to increase recycling to 50% for 2025 and 55% for 2030. In the future we hope that recycling will replace all other waste management processes.

	WITHIN FACILITIES	OUTSIDE FACILITIES	TOTAL
<b>WASTE AVAILABLE FOR RECOVERY (t)</b>			
<b>HAZARDOUS WASTE</b>			
Preparation for reuse	0.00	0.00	0.00
Recycling	0.00	0.12	0.12
<b>Total</b>	<b>0.00</b>	<b>0.12</b>	<b>0.12</b>
<b>NON-HAZARDOUS WASTE</b>			
Preparation for reuse	0.00	72.89	72.89
Recycling	0.00	2,977.15	2,977.15
<b>Total</b>	<b>0.00</b>	<b>3,050.04</b>	<b>3,050.04</b>

	WITHIN FACILITIES	OUTSIDE FACILITIES	TOTAL
<b>WASTE THAT IS NOT AVAILABLE FOR RECOVERY (t)</b>			
<b>HAZARDOUS WASTE</b>			
Incineration (with energy recovery)	0.00	91.82	91.82
Incineration (without energy recovery)	0.00	0.00	0.00
Landfill	0.00	0.00	0.00
<b>Total</b>	<b>0.00</b>	<b>91.82</b>	<b>91.82</b>
<b>NON-HAZARDOUS WASTE</b>			
Incineration (with energy recovery)	0.00	0.00	0.00
Incineration (without energy recovery)	0.00	0.00	0.00
Landfill	0.00	158.79	158.79
<b>Total</b>	<b>0.00</b>	<b>158.79</b>	<b>158.79</b>

	WASTE PRODUCTION	WASTE TO BE RECOVERED	WASTE FOR DISPOSAL
<b>WASTE PRODUCTION (t)</b>			
<b>HAZARDOUS WASTE</b>			
Inks	91.82	0.00	0.00
Batteries	0.12	0.00	0.00
<b>Total</b>	<b>91.94</b>	<b>0.12</b>	<b>91.82</b>
<b>NON-HAZARDOUS WASTE</b>			
Plastic waste	1,302.15	1,302.15	0.00
Paper and cardboard packaging	272.50	272.50	0.00
Plastic packaging	1,264.42	1,264.42	0.00
Wooden packaging	138.07	138.07	0.00
Iron and steel	72.89	72.89	0.00
Other waste	158.79	72.89	158.79
<b>Total</b>	<b>3,208.83</b>	<b>3,050.04</b>	<b>158.79</b>



## Innovation

### Contribution to the development of knowledge, of art and technology



#### Our approach

The Company during its operation creates or may create the following positive or negative impacts:

#### Contribution to the development of knowledge and technology

Positive impacts from:

- the development of innovative solutions by the Company's Research and Development (R&D) department, by providing opportunities for employees to participate in innovative projects and programs and by the possible further increase in packaging recyclability.

#### Limited contribution to the development of knowledge and technology

Negative impacts from:

- the possible reduction in investments in the field of Research and Development (R&D).

Research and Development (R&D) plays an important role in our business model as it contributes the most to the continuous improvement of our products. At FLEXOPACK we invest substantially in the innovation of our products, in order to always be at the forefront of technological development.

#### Research and development

Achieving the goals for innovation requires the direct and close cooperation of the Quality Assurance department with the Research and Development (R&D) Department, which consists of specialized scientific personnel with rich professional experience and specialized know-how. The Research and Development Department, through the continuous study and monitoring of the market, aims at the further development of innovative solutions and products of high added value. Its purpose is the more complete coverage of the ever-changing needs of the market and the demands of customers for the production of thinner, more transparent and more sophisticated films.

In cooperation with suppliers and customers, we design and develop new innovative products that adopt the new technological standards of packaging, while aiming at new plastic technologies, more functional packaging as well as the use of optimal raw materials.

In addition, the Company focuses on the high quality of its products and the organization of their production methodology, with the continuous and absolute observance of all the necessary safety rules, quality control and other procedures. The Research and Development Directorate, which is located in the central facilities in Koropi, Attica, cooperates with research centers, such as the "Demokritos" Research Institute, as well as with universities and other educational institutions in various research projects. It constitutes the core of our product development and testing program to achieve the optimal packaging solution for any use and application.

Product optimization is a very important field of study for FLEXOPACK and therefore invests in efficient partnerships for the development of innovative solutions. In this light, the Company provides its employees with the opportunity to participate in innovative projects and programs, as a result of which both their personal development and their contribution to the further development of the Company are achieved.



### Research and Development Axes

All of the Company's products are subject to strict control and testing procedures, in order to ensure full compliance with international standards. The Research and Development Department is equipped with modern machines for the analysis and evaluation of plastic films. Its operation and the general policy of the Company in terms of the organization and effectiveness of the above Directorate, is contained and summarized in the following triptych:

- 🍃 Upgrade of existing products.
- 🍃 Development of new products.
- 🍃 Exploitation of all new technological possibilities and practices.

“The Company has filed approximately **50 patents** in many countries and in particularly demanding markets, including the USA, Australia, New Zealand, as well as the European Patent office.”

Relying on its well-manned and equipped Research and Development Department, as well as on its long-standing specialized presence in the sector, it can differentiate itself from the existing competition both in terms of products and in the creation of strong infrastructures in production equipment and present innovative differentiated solutions to its customers.

### The main axes of the Company's Research and Development are the following:

- 🍃 The protection of the quality and safety of the product, so that the packaging of FLEXOPACK to ensure the quality of the packaged product throughout its life cycle.
- 🍃 The increase of packaged products' lifespan especially in sensitive goods.
- 🍃 The development of technologies with the aim of limiting the volume/ weight of plastic in the final manufactured product (packaging lightening).
- 🍃 The development of recycling-friendly plastic packaging in order to further increase their degree of recyclability.
- 🍃 The increase in the use of recycled raw materials, against primary plastic raw material. Specifically for the production of secondary packaging, where FLEXOPACK is the main supplier of the Greek market in multipacks of bottles and aluminum cans of soft drinks, beer and water, until 2019 it was used exclusively virgin raw material.
- 🍃 In 2020, 20% of primary material was replaced by recycled, and by 2022 we aim to replace up to 50% of raw material from recycled to some of our products.
- 🍃 The search and use of plastic raw materials, which stem from alternatives biological sources (non fossil fuel feedstock), the production of which is not at the expense of the production of food for consumption.
- 🍃 Use of chemically recycle derived raw materials, which are suitable for food packaging applications.
- 🍃 Development of plastic films which allow paper packages to gain functional characteristics that until now they were only possible with purely plastic packaging.

Our Company systematically invests and upgrades its equipment and more specifically the equipment of the Research and Development Department. Equipment has recently been installed which enables a more in-depth analysis of the properties of raw materials derived from mechanical recycling, with a view to considering their wider use in our products.

### Certifications - Certified Organization

The Company cooperates with the internationally recognized Cyclos HTP certification laboratory regarding product certifications.

### Participation in Industry Associations - Organizations





The Company, operating in various countries worldwide, operates in accordance with the guidelines and regulations applicable per country of operation, as issued by the competent bodies:

-  **REDCYCLE / APCO**  
(Australian Packaging Covenant Organization) in Australia
-  **CEFLEX** in Europe
-  **OPRL** (On Pack Recycling Label) in the United Kingdom

FLEXOPACK - as mentioned before - as an active member of CEFLEX, aims to further contribute to the flexible packaging in the circular economy, through the cooperation of companies representing the entire spectrum of the value chain.

In this context, compliance with the composition of packaging plastics is strengthened, so that they are more recycling-friendly, always following the directions from the above bodies.

At the same time, in order to inform the group about technologies related to recycling, it organizes actions such as:

-  Training of the Company's executives.
-  Continuous interaction with suppliers.
-  Participation in industry exhibitions.
-  Participation in various consortia in Europe and Australia to monitor developments in recycling issues.

### Our performance

(FLEXOPACK Index – Innovative Projects)

INNOVATIVE PROJECTS	
Patents - proprietary patents in the last 10 years	<b>50</b>

## Atmosphere and climate








### Our approach

The Company during its operation creates or may create the following positive or negative impacts:



### Climate change mitigation and adaptation and air quality improvement:

Positive impacts from:

-  improving energy efficiency in the Company's production units.
-  the contribution of the Company's products to the increase of packaged foods' shelf life and the consequent reduction of food waste.
-  the possible increase in the percentage of electric/hybrid company cars.
-  preventing the release of atmospheric pollutants (for example NOx, SOx, PM, VOCs) from the production process.
-  potential investments regarding the improvement of energy efficiency.

### Impact of operation on climate change and causing air pollution:

Negative impacts from:

-  the greenhouse gas emissions created by the consumption of natural gas and electricity from non-renewable sources.
-  the direct and indirect released atmospheric pollutants resulting from fuel consumption during the transport and distribution of raw materials and products.



### Improving air quality

To ensure the improvement of air quality, annual measurements are carried out in the production units, in order to keep the products safe, to avoid any possible contamination of them, but also to protect the health and safety of the workers.

In the context of improving air quality from the pollutants produced by our activities, we use an internal post-combustion system for the gases released during production.

During the post-combustion process, the measurements follow the requirements of the Environmental Conditions Approval Decision (AEPO) with the aim of maintaining low pollutant levels within limits. More specifically, measurements are carried out every four months of the POE, CO and NOx content of the gaseous waste emitted, in all the chimneys of the unit, as well as of the diffuse emissions (volatile organic compounds, VOCs) taking at least three measurement values during each series of measurements in order to document the compliance of the facilities with the limit values of gas emissions and the values of diffuse emissions imposed by the environmental conditions.

### Mitigation of climate change impacts

Mitigation of the effects caused by our activities on climate change is a key pillar and goal of our Company, in the context of sustainable production and our general business operation.



### Improving energy efficiency

FLEXOPACK, through a series of actions to upgrade the energy of its building facilities, aims to reduce energy consumption and therefore direct and indirect greenhouse gas emissions.

In this direction, in 2021, the following actions were carried out:

- Energy upgrade of the Company's equipment to a more efficient energy class.
- Establishing the use of heat pumps for cooling and heating of the buildings.
- Replacement of conventional lamps with LED lamps for all production units.
- Replacement of air conditioning units with more efficient machines.
- Installation of a logic controller (PLC) system for the monitoring of refrigeration units in order to achieve lower consumption.
- Improving the insulation of buildings to seal the maximum possible reduction of energy consumption.

Additionally, in the context of reducing its carbon footprint, FLEXOPACK is in the process of investigating an investment plan regarding the following actions:

- Installation of photovoltaic panels for the production of electricity, reducing the use of non-renewable sources, in order to cover part of its energy needs.
- Continuous energy upgrading of older buildings facilities, as part of the Company's strategy to improve the efficiency of buildings.
- Calculation of greenhouse gas emissions (Scope 1, 2, 3), in order to establish targets for their reduction.
- Increase in the percentage of environmentally friendly electric/hybrid company vehicles.

In the context of the proper management of the energy consumed, the Company has implemented energy studies to evaluate its energy efficiency and based on the recorded results, annual targets were set, which will be available in the next Sustainable Development Report. FLEXOPACK, during the reporting period is in the process of implementing an Energy Management system according to ISO 50001 in order to be certified in the next period by the competent body.



## Our performance

	UNIT	GREECE
<b>ENERGY CONSUMPTION AND PRODUCTION<sup>5</sup></b>		
Total amount of energy consumed within the organization	MJ	143,077,563
	MWh	40,061.72
Percentage of electricity consumed	%	96.56%
Percentage of energy consumed that derives from renewable sources	%	0.00%
Total amount of energy produced	MWh	0
Percentage of energy produced that derives from renewable sources	%	0.00%

[ESG ATHEX C-E3, GRI 302-1b, e]

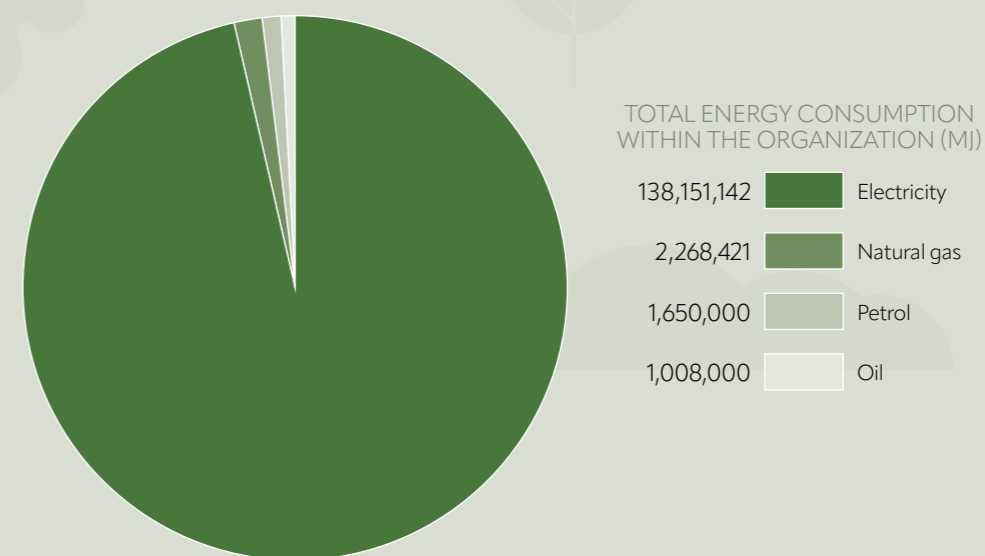
	ΜΟΝΑΔΑ	ΕΛΛΑΔΑ
<b>ENERGY CONSUMPTION FROM NON-RENEWABLE SOURCES<sup>5</sup></b>		
<b>FUEL</b>		
Natural gas	MJ	2,268,421
Oil	MJ	1,008,000
Petrol	MJ	1,650,000
<b>Total</b>	<b>MJ</b>	<b>4,926,421</b>

[GRI 302-1]

<sup>5</sup> To calculate electricity and fuel consumption, unit conversion factors (MJ, kWh, lt) from the methodology guide DEFRA (Department for Environment, Food & Rural Affairs) were used. The data is collected through bills, which are sent by energy providers. It refers to energy consumed exclusively in the production unit. It is noted that the data for the countries Poland and Australia are not available for the year 2021. FLEXOPACK is in the process data collection.

	UNIT	GREECE
<b>TOTAL ENERGY CONSUMPTION WITHIN THE ORGANIZATION (MJ)</b>		
Total electricity consumption	MJ	136,377,115
Total energy consumed for cooling	MJ	1,774,027

[GRI 302-1]



GREECE

<b>ENERGY INTENSITY<sup>6</sup></b>	
Total energy consumption (MWh) / Total number of employees in Greece	<b>124.4</b>

[GRI 302-3]

<sup>6</sup> The energy intensity has been calculated only for Greece as the Company is in the process of calculating the total energy consumption for Poland and Australia.

# Society



# 04

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- 86 Quality assurance
- 88 Certifications
- 91 Development procedure of new products
- 97 Economic value
- 100 Creating indirect economic value



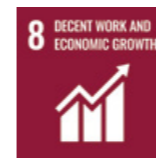
## Social contribution

Along with the respect that FLEXOPACK shows to the Environment, it recognizes that the Company's success is based on excellent relations with its employees.

In addition, the Company is based on fundamental principles, strengthening the local community, highlighting the importance of work-life balance and offering equal development opportunities to its people through a safe working environment.



## Employment






### Our approach

The Company during its operation creates or may create the following positive or negative impacts:


### Contribution to employment

Positive impacts:

-  By the creation of direct and indirect job positions.
-  Recruitment of employees from the local community.
-  Potential implementation of procedures, specific training plan and performance evaluation practices for all employees.

### Reduced recruitment and low staff retention rate

Negative impacts:

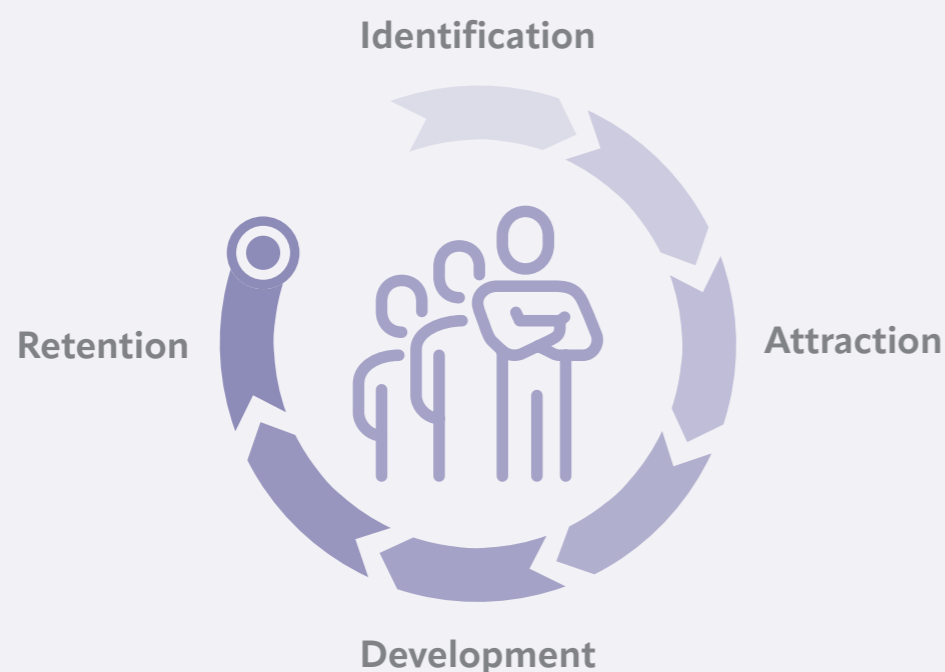
-  Due to the low staff retention rate in the production segment.

At FLEXOPACK we prioritize the research for employees from the local community and strengthen the skills of vulnerable social groups, such as young people and the long-term unemployed, contributing positively to employment.

The Company, by implementing adequate human resource management practices, providing attractive salaries and benefits, aims to attract candidates who will dynamically join the Company, creating strong ties with its people and enjoying a meritorious and privileged work environment. In addition, the Company, by implementing a training plan and performance evaluation practices for all employees, aims at the long-term retention of its human resources.

### Our priority, our people

The employees of FLEXOPACK constitute our competitive advantage, ensuring in the long term, the achievement of our strategic goals and the implementation of our development and programs. We recognize and appreciate the valuable contribution of employees to the development and positive course of the Company. In this context, we have developed an organized and modern Human Resources Department for the FLEXOPACK Group, with the priority of recruiting employees from the local community.



Our aim is to ensure a safe and fair working environment that respects people and diversity and promotes trust, equal opportunities, team spirit and efficiency. We are committed on ensuring the best possible working conditions, respect for human rights, avoiding discrimination and offering equal opportunities for training and development.

### Benefits for our people

At FLEXOPACK we offer a number of additional benefits beyond the basic ones and programs for all our employees and their families, not only to reward them for their good performance, but also to enhance the sense of job security.

#### All employee benefits and social policy programs are described below:

- Provision of medical care to administrative staff and as of 2022 to all employees.
- Planning, organization and implementation of prevention and health promotion programmes: Covid-19 PCR test.
- Support for employees in case of illness or accident. Support for both patients and their family environment. Care for their smooth reintegration into the workplace.
- Financial aid due to illness or accident.
- Counseling services to address personal, family issues and interpersonal relationship problems in the workplace.
- Design and implementation of a First Aid training program.
- Monitoring of health certificates, planning and implementation of all required for the issuance and renewal of medical examinations at the financial expense of the Company.
- Informing and raising awareness among employees on various social issues.
- Planning, organization and implementation of voluntary actions.





## Our performance

There are no collective agreements in the Companies in Greece, Poland and Australia.

GEOGRAPHIC AREA	MALE	FEMALE	TOTAL
<b>EMPLOYEES (2021)*</b>			
<b>GREECE</b>			
Permanent employees	266	56	322
Temporary employees	0	0	0
<b>POLAND</b>			
Permanent employees	26	17	43
Temporary employees	27	3	30
<b>AUSTRALIA</b>			
Permanent employees	36	18	54
Temporary employees	0	0	0
<b>Total</b>	<b>355</b>	<b>94</b>	<b>449</b>

[GRI 2-7]

\* It is noted that all the employees in Greece, Poland and Australia are full-time.

<b>WORKERS THAT ARE NOT EMPLOYEES (2021) *</b>	
<b>GREECE</b>	
Total number of workers that are not employees	6

[GRI 2-8]

\* It is noted that the data for Poland and Australia are not available for the year 2021. FLEXOPACK is in the process of collecting the data. In addition, it is noted that there were no significant fluctuations in the number of workers that are not employees during the reference period and compared to previous reference periods. Workers that are not employees refer to external partners.

## FEMALE EMPLOYEES (2021)

	GREECE	POLAND	AUSTRALIA
Employees	17%	27%	33%
In management positions	12.5%	25%	14.3%

[ESG ATHEX C-S2, ESG ATHEX C-S3]

## SALARY DIFFERENCE BETWEEN MALE AND FEMALE (2021)

Male / Female	GREECE	POLAND	AUSTRALIA
	6.0%	20.8%	31.6%

[ESG ATHEX A-S3]

## MOBILITY OF PERSONNEL (2021)

	GREECE	POLAND	AUSTRALIA
Voluntarily	14.6%	42.7%	42.6%
Not voluntarily	3.1%	0%	0%

[ESG ATHEX C-S4]

## ANNUAL PROPORTION OF COMPENSATION

	GREECE	POLAND	AUSTRALIA
Annual compensation of the CEO (€)	313,251	53,700	119,376
CEO-employees pay ratio	18.6	5.5	4.4

## RATE OF INCREASE IN PAY RATIO

	GREECE	POLAND	AUSTRALIA
CEO – employees (%)	5	0	2

[GRI 2-21, ESG ATHEX A-S4]

The amount of variable remuneration\* granted to the Company's executives against the total remuneration of the executives for 2021 amounts to 18%.

\* As variable pay is defined the amount of remuneration granted to an employee after achieving a specific performance target. It is noted that the data for the countries Poland and Australia is not available for the year 2021. FLEXOPACK is in the process of collecting the data.

Total headcount, rate of new recruitments and resignations by age group, gender and country (2021):

GREECE

		NUMBER OF NEW EMPLOYEE RECRUITMENTS	TOTAL NUMBER OF EMPLOYEES	PERCENTAGE OF NEW RECRUITMENTS
<b>HEADCOUNT</b>				
<b>NEW RECRUITMENTS</b>				
<30 years old	MALE	8	17	0.47%
	FEMALE	1	1	1.00%
	<b>TOTAL</b>	<b>9</b>	<b>18</b>	<b>0.50%</b>
30-50 years old	MALE	25	170	0.15%
	FEMALE	9	37	0.24%
	<b>TOTAL</b>	<b>34</b>	<b>207</b>	<b>0.16%</b>
>50 years old	MALE	4	79	0.05%
	FEMALE	1	18	0.06%
	<b>TOTAL</b>	<b>5</b>	<b>97</b>	<b>0.05%</b>

		NUMBER OF RESIGNATIONS OF EMPLOYEES	TOTAL NUMBER OF EMPLOYEES	PERCENTAGE OF RESIGNATIONS
<b>RESIGNATIONS OF EMPLOYEES</b>				
<30 years old	MALE	6	17	0.35%
	FEMALE	2	1	2.00%
	<b>TOTAL</b>	<b>8</b>	<b>18</b>	<b>0.44%</b>
30-50 years old	MALE	25	170	0.15%
	FEMALE	9	37	0.24%
	<b>TOTAL</b>	<b>34</b>	<b>207</b>	<b>0.16%</b>
>50 years old	MALE	9	79	0.11%
	FEMALE	3	18	0.17%
	<b>TOTAL</b>	<b>12</b>	<b>97</b>	<b>0.12%</b>

[GRI 401-1]

POLAND

		NUMBER OF NEW EMPLOYEE RECRUITMENTS	TOTAL NUMBER OF EMPLOYEES	PERCENTAGE OF NEW RECRUITMENTS
<b>HEADCOUNT</b>				
<b>NEW RECRUITMENTS</b>				
<30 years old	MALE	18	25	0.72%
	FEMALE	0	12	0%
	<b>TOTAL</b>	<b>18</b>	<b>27</b>	<b>0.67%</b>
30-50 years old	MALE	7	28	0.25%
	FEMALE	0	14	0%
	<b>TOTAL</b>	<b>7</b>	<b>42</b>	<b>0.17%</b>
>50 years old	MALE	0	0	0%
	FEMALE	0	4	0%
	<b>TOTAL</b>	<b>0</b>	<b>4</b>	<b>0%</b>

		NUMBER OF RESIGNATIONS OF EMPLOYEES	TOTAL NUMBER OF EMPLOYEES	PERCENTAGE OF RESIGNATIONS
<b>RESIGNATIONS OF EMPLOYEES</b>				
<30 years old	MALE	2	25	0.08%
	FEMALE	0	2	0%
	<b>TOTAL</b>	<b>2</b>	<b>27</b>	<b>0.07%</b>
30-50 years old	MALE	0	28	0%
	FEMALE	0	14	0%
	<b>TOTAL</b>	<b>0</b>	<b>42</b>	<b>0%</b>
>50 years old	MALE	0	0	0%
	FEMALE	0	4	0%
	<b>TOTAL</b>	<b>0</b>	<b>4</b>	<b>0%</b>

[GRI 401-1]

Total headcount, rate of new recruitments and resignations by age group, gender and country (2021):

## AUSTRALIA

NUMBER OF NEW EMPLOYEE RECRUITMENTS      TOTAL NUMBER OF EMPLOYEES      PERCENTAGE OF NEW RECRUITMENTS

### HEADCOUNT

#### NEW RECRUITMENTS

Age Group	Gender	Number of New Employee Recruitments	Total Number of Employees	Percentage of New Recruitments
<30 years old	MALE	5	9	0.56%
	FEMALE	4	5	0.80%
	<b>TOTAL</b>	<b>9</b>	<b>14</b>	<b>0.64%</b>
30-50 years old	MALE	5	19	0.26%
	FEMALE	5	10	0.50%
	<b>TOTAL</b>	<b>10</b>	<b>29</b>	<b>0.34%</b>
>50 years old	MALE	0	8	0%
	FEMALE	1	3	0.33%
	<b>TOTAL</b>	<b>1</b>	<b>11</b>	<b>0.09%</b>

NUMBER OF RESIGNATIONS OF EMPLOYEES      TOTAL NUMBER OF EMPLOYEES      PERCENTAGE OF RESIGNATIONS

#### RESIGNATIONS OF EMPLOYEES

Age Group	Gender	Number of Resignations of Employees	Total Number of Employees	Percentage of Resignations
<30 years old	MALE	6	9	0.67%
	FEMALE	3	5	0.60%
	<b>TOTAL</b>	<b>9</b>	<b>14</b>	<b>0.64%</b>
30-50 years old	MALE	14	19	0.74%
	FEMALE	4	10	0.40%
	<b>TOTAL</b>	<b>18</b>	<b>29</b>	<b>0.62%</b>
>50 years old	MALE	1	8	0.13%
	FEMALE	1	3	0.33%
	<b>TOTAL</b>	<b>2</b>	<b>11</b>	<b>0.18%</b>

[GRI 401-1]

## Training



### Our approach

The Company during its operation creates or may create the following positive or negative impacts:

### Contribution to the creation of opportunities that promote training and development

Positive impacts:

- By the implementation of an annual evaluation for all employees, by the provision of training programs to employees and by the provision of scholarships to doctoral students.

### Reduced contribution to education and development

Positive impacts:

- By the possible failure to follow the training plan.



The evolution and development of our employees has always been an important factor for the Company's success. The Company continuously provides opportunities for employees to upgrade their educational background at the same time as their practical experience. For FLEXOPACK, the importance of training its human resources lies in the fact that an effective training program contributes to the cultivation of its people critical thinking, to the increase of employees' productivity, to the provision of better quality services, to the strengthening of their self-esteem, to the understanding of problems and their efficient resolution.

[GRI 3-3]

### Continuous training and development of employees

The Company's positive contribution to the creation of opportunities that promote education is highlighted through the educational program that is formed on an annual basis and is included in its annual budget.

#### Training needs are defined through:

- 
 the framework of the strategy and annual objectives for the provision of educational programmes.
- 
 based on the needs arising, primarily at group level, by the annual staff evaluation process, through evaluation forms.

In this way, an environment of continuous education is provided with training seminars, as well as educational programs. In the training programs and depending on the employee's position or specialty, priority is given to new technological developments in the Company's sector of activity, to health and safety (mainly for those who work in production) as well as to everything else deemed necessary for the efficient operation of the Company.



The training and seminars held annually concern the following indicative topics which remain unchanged, but also arise from the current needs of the Company:

TRAINING AND SEMINARS <sup>7</sup>	METHOD OF CONDUCTING TRAINING
ISO Certifications and their proper implementation	External organizations
Health and Safety at work	Internal training
Food and Environment	External organizations
Labour legislation	External organizations
Technical / engineering issues	External organizations and internal training
Market and marketing topics (packaging conference)	External organizations
Application software (ERP system, CRM, and others)	Internal training
New developments in the industry	External organizations and through the participation of the Company in exhibitions
Risk management	External organizations
International standards (GRI Standards)	External organizations
Corporate Governance	External organizations

Additionally, the Company approves requests for seminars as well as other graduate programs (Master, MBA) through the employee's application process and with the consent of their manager. In addition to its employees, the Company offers scholarships that support doctoral students, universities, foundations and the academic community in general.

<sup>7</sup> Σημειώνεται πως η Εταιρεία δεν παρέχει προγράμματα μετάβασης (retiring transition assistance programs).



## Our performance

	MALE	FEMALE
<b>AVERAGE OF TRAINING HOURS PER EMPLOYEE</b>		
<b>GREECE</b>		
Senior management	3	3
Head of departments	4	4

<b>AVERAGE OF TRAINING HOURS PER CATEGORY OF EMPLOYEES</b>		
<b>GREECE</b>		
Administrative staff	2	2
Support staff	2	2
Production Staff	2	2

<b>TRAINING OF EMPLOYEES BASED ON COMPENSATION</b>		
<b>GREECE</b>		
Employees in the top 10% of personnel with the highest total compensation	6	6
Employees in the 90% of personnel with the lowest total compensation	8	8

<b>PERCENTAGE OF EMPLOYEES WHO RECEIVE REGULAR EVALUATIONS OF PERFORMANCE AND CAREER DEVELOPMENT</b>		
<b>GREECE</b>		
Administrative staff	100%	100%
Support staff	100%	100%
Production Staff	100%	100%
Total number of employees	266	56
Total percentage of employees	100%	100%

\* It is noted that the data for Poland and Australia is not available for the year 2021. FLEXOPACK is in the process of data collection.

	GREECE	POLAND	AUSTRALIA
<b>TOTAL TRAINING EXPENSES PER COUNTRY (2021)</b>			
€	6,272	2,500	8,310
<b>Total</b>	<b>17,082</b>		

## Health, safety and well-being



### Our approach

The Company during its operation creates or may create the following positive or negative impacts:

### Protection and promotion of physical, mental and social health and well-being

Positive impacts from:

- conducting trainings on health and safety issues, from the use of personal protective equipment and from systematic monitoring of intra-company events.

### Reduced protection of physical, mental health and social well-being

Negative impacts from:

- the absence of practices and programs that promote personal and professional life balance (wellbeing).










### Actions to ensure Health and Safety

Ensuring the health and safety (H&S) of our employees as well as the prevention of occupational risk is for us a moral obligation and a business necessity that goes beyond the limits of a simple legal obligation. FLEXOPACK recognizes the importance of the mental health of its employees and aims at actions that enhance and strengthen it.

Our primary concern is to take measures and implement projects as well as special programs to achieve our objectives for H&S in the workplace.

In this direction, FLEXOPACK implements the following:

-  Continuous checking and quality upgrade of the equipment, in order to achieve the improvement of the conditions for the safe execution of the work with the minimum possibility of a serious accident.
-  Effective protection of people (staff, contractors, partners and visitors), as well as our facilities, from potential risks that may arise.
-  Continuous staff training and information on H&S issues, with the aim of preventing accidents and occupational diseases.
-  Active participation of all employees and Management in finding acceptable and effective solutions for protection and safety.
-  Identification and assessment of the risk and creation of safety regulations.
-  Maintaining an Occupational Hazard Report.
-  Open communication between employees and Management regarding H&S issues as well as with the Occupational Physician.



The Safety Technician, who is responsible for the systematic monitoring of incidents (relevant comments, investigation, recommendations) conducts H&S inspections as defined by the legislation. In addition, employees have the opportunity to report potential risks or safety issues, either directly to the head of the department or during inspections directly to the Safety Technician.

By implementing the above initiatives, we have succeeded in minimizing incidents and near misses. This is achieved to a large extent due to the prevention and the timely and systematic recording, which are mentioned in the risk study.

FLEXOPACK, with the aim of further protecting and promoting physical, mental and social health and well-being, as of 2022 will extend the provision of medical care to all employees.

### Continuous education and prevention

The Company carries out training on H&S issues during the recruitment of each employee and additionally at regular intervals, either preventively or on the occasion of an incident. The trainings concern both the supervisors and managers of the departments as well as all the production workers.

The Company has the necessary work equipment, which, based on the relevant instructions for the protective means required, is distributed to the employees depending on the department, position or the production machine they handle. Additionally there is a complaint box available where reports on H&S issues are made anonymously.

### Our response to the pandemic COVID-19

The Group's Management, prioritizing the protection and safety of its employees, is closely monitoring developments related to the COVID-19 pandemic and is taking timely and effective measures to manage the effects of the pandemic, ensures the business continuity and uninterrupted operation the limitation of the negative consequences to the smallest possible extent.

In order to ensure the H&S of the Company's employees and partners, the following measures were implemented as early as 2020:

- Establishment of an action coordination group, with the participation of the Facility Manager, the managers of the production departments and the Human Resources Department.
- Preparation of a comprehensive program of preventive actions.
- Constant communication and coordination with the Occupational Physician, for the valid notification of all employees regarding the scrupulous observance of the rules of personal hygiene and the other recommendations and instructions of the National Public Health Organization (EODY).
- Provision of personal protective equipment to personnel such as masks, gloves and antiseptics.
- Carrying out regular disinfections on the Company's premises.
- Conducting a COVID test for staff in collaboration with diagnostic centers.
- Daily temperature measurement of personnel and partners and anyone entering the Company's premises.
- Installation of special protective partitions in the office area.
- Remote work implementation for a large part of the administrative staff.
- Preventive removal of people belonging to vulnerable groups.
- Setting more strict rules regarding movements as well as the entry and exit of both the Company's staff and partners as well as third parties in its facilities.
- Prohibition of business trips, unless there is special exceptional approval from the Management.

### Our approach

Number and percentage of all employees who do not belong to the Company but whose work and/or workplace is controlled by FLEXOPACK, who are covered by an H&S management system, which has been internally audited.

EMPLOYEES	PERCENTAGE
<b>6</b>	<b>100%</b>

[GRI 403-8]

In 2021, there were no recorded incidents of visitors' accidents, and no recorded work-related illnesses in workers and visitors.

### INJURIES RELATED TO THE PROFESSIONAL WORK (2021) <sup>8</sup>

#### MAIN TYPES OF WORKPLACE-RELATED INJURIES

Minor accidents resulting from the use of sharp objects (e.g. use of professional scissors and other blades).

	EMPLOYEES	OTHER WORKERS (PARTNERS)
Number of working hours	772,800	14,400
Number of deaths caused by injuries	0	0
Injury death rate	0	0
Number of significant injuries <sup>10</sup>	0	0
Major injury index <sup>10</sup>	0	0
Number of recorded injuries <sup>9</sup>	8	0
Accident frequency index <sup>10</sup>	2.1	0
Accident Severity Index <sup>11</sup>	44.5	0
Number of working days lost due to occupational accidents	172	0

[GRI 403-9, 403-10, ATHEX SS-S6]

<sup>8</sup> It is noted that the data for the countries Poland and Australia is not available for the year 2021. FLEXOPACK is in the process of collecting the data.

<sup>9</sup> A recordable injury that has been diagnosed by a physician or other authorized professional, even if it does not result in death, includes absence from work, work limitation or transfer to another job, medical treatment other than first aid, and loss of conscience.

<sup>10</sup> The index equals the number of recorded injuries \* 200,000 divided by the number of hours worked by all employees in a calendar year. The factor 200,000 represents the number of hours worked by 100 full-time workers, 40 hours per week for 50 weeks per year.

<sup>11</sup> The index is equal to the number of working days lost due to occupational accidents \* 200,000 divided by the number of working hours of all employees in a calendar

## Quality assurance



### Quality and reliability

FLEXOPACK's position for providing products of particularly high quality has been established at an international level. Its continuous and focused efforts are supported by the Quality Assurance Division.

The Company achieves its quality goals following, among others, the following fundamental principles:

- 🍃 Faithful and uninterrupted compliance with strict policies, procedures and standards
- 🍃 Providing high quality products that exceed customer expectations
- 🍃 Effort to reduce defective products with the aim of limiting waste
- 🍃 Creating together with customers and suppliers a team that embraces the same values and the same corporate culture
- 🍃 Efficiency having safety as a priority
- 🍃 Ensuring its sustainability and business continuity

“FLEXOPACK's packaging products provide the necessary protection so that the foods that are packed are preserved throughout their life up to the final consumer at all stages of the supply chain, without the loss of nutrients and packaged safely, providing our customers with competitive and durable products.”





### Certifications

At FLEXOPACK there are applied certified quality assurance standards. International certifications constitute the proof of the Company's commitment to the quality and safety of products and processes.

Specifically, the Company has received the following certifications:



#### BRCGS

Global Standard for Packaging Materials

Since April 2003, it has been accredited with the international standard for Packaging Materials of the leading product and consumer protection organization, Brand Reputation Compliance Global Standards (BRCGS), which has European recognition and introduces high requirements in hygiene, product safety and quality.



#### ISO 9001:2015

Quality Management Standard

The Company is certified and evaluated with the international Quality Management System ISO 9001, by the certification body Bureau Veritas, for the design, development, production, distribution and technical support of its products.



#### ISCC Plus

The International Sustainability and Carbon Certification FLEXOPACK is certified according to the ISCC Plus standard through which it ensures the use of sustainable raw materials for the production of packaging materials.



#### SEDEX

SEDEX is the world's largest platform for sharing responsible supply chain sourcing data, used by more than 40,000 members in more than 150 countries.

Sedex is a non-profit, membership organization dedicated to improving ethical and responsible business practices in global supply chains.

FLEXOPACK is a SEDEX registered company, with reference number ZC1081533.






FLEXOPACK has been audited successfully on the requirements of SMETA's 4 pillars, including the following:

- 01 Labour standards & Human rights  
Labor Management System, Wages, Working Hours, No Child Labour/Modern Slavery/ Discrimination.
- 02 Pillar of Health & Safety Standards  
Health & Safety Management, Health & Safety Training, Emergency & Fire Safety, Factory Machinery & Vehicles, Cleaning & Hygiene.
- 03 Pillar of environmental standards  
Environmental Management Systems, Waste, Raw Materials, Water, Pollution, Pollutant Emissions, Energy.
- 04 Business Integrity  
Business Ethics Management Systems, Anti-corruption Policy.

### Product safety and quality policy

The quality policy has been formulated according to the requirements of ISO and BRCGS standards.

The basic principles for the effectiveness of the Company's quality assurance are as follows:

-  Compliance with the policies, procedures and standards in all the countries that the Company operates.
-  Providing consistent product quality that exceed customer expectations.
-  Create communication with customers and suppliers who embrace the Company's values.
-  Conducting inspections and necessary quality measurements with the appropriate equipment at all stages, from the sample production stage to the final trading product.
-  Product quality control system.

Specifically, with the product quality control system, the complete recording of the quality parameters is achieved, as it enables identification and traceability at all stages of the production and distribution of the product as described in the corresponding section below "Identification and traceability". According to the requirements of the implemented Quality System, based on the ISO 9001 standard, the sample retention time is one year and the method for handling complaints is the physical counter-samples kept by the Company in the laboratory.

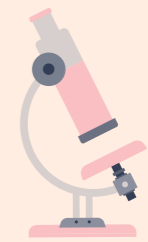
### Product development procedure



**(QA)**  
Quality Criteria recording



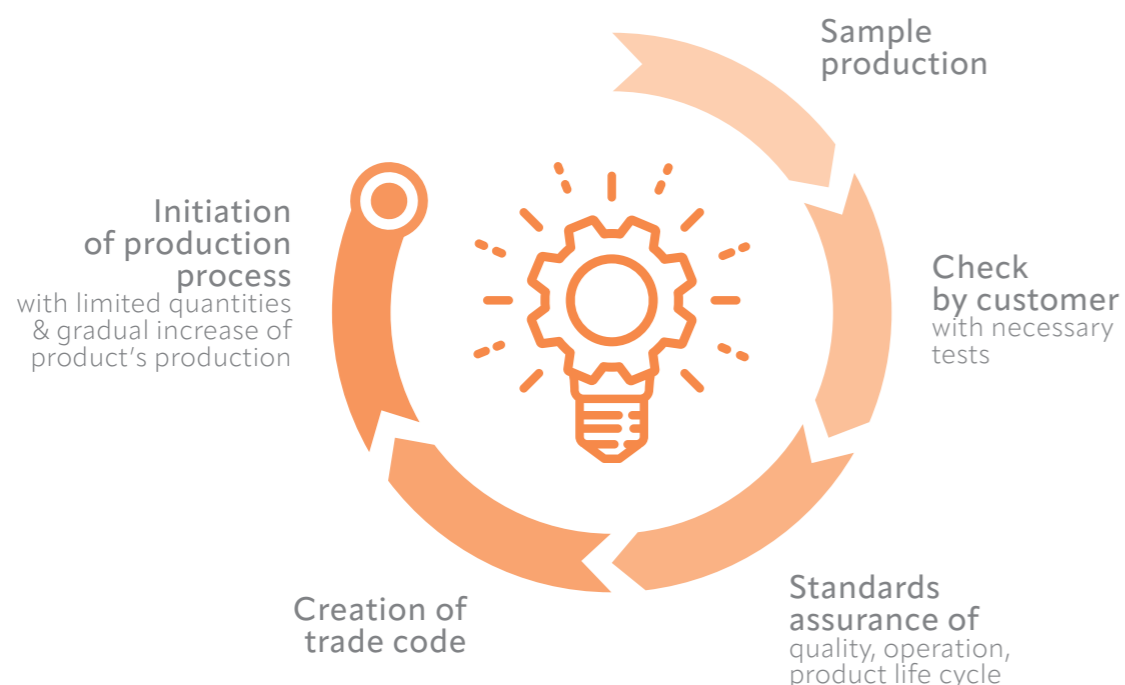
**(QC)**  
Quality Control specifications using appropriate equipment



**(Testing)**  
Conducting laboratory Testing throughout a product's lifetime



After completion of a new product development the next stages are the following:



The high reliability of the Company's products is confirmed by the declaration of compliance (DECLARATION of COMPLIANCE for Food Contact Materials) with the laws governing the food industry.

The specifications of the manufactured products are checked by the Quality Control Department and the Quality Assurance Department, which in collaboration with the Research and Development Department have developed an effective control system. The design as well as the final check of the product is completed with the process of approving the suitability of the packaging by the relevant departments for each product, always in accordance with the customer's requirements

The Company's Quality Assurance Department is responsible for the design, implementation and monitoring of assurance systems always in accordance with International ISO Standards. At the same time, it supports the training of its employees in quality matters and the recording, prevention and treatment of non-compliance incidents.

### Quality inspections

In the context of the standards' requirements by which the Company is certified, the Quality Assurance Department is responsible for the implementation of annual internal inspection programs.

The Company also receives regular external inspections from the competent supervisory bodies and by the clients. Full compliance with the provisions provided in combination with continuous preventive and corrective actions at each stage, ensure the effective management of potential failures.

The Company has been awarded for the exemplar production process systems it follows and in this context trainings have been carried out in its facilities by the Unified Food Control Agency (EFET) and the corresponding European organization (EFSA).







EXTERNAL BODIES INSPECTION PROGRAM	
ISO 9001:2015	ANNUALLY EVERY MARCH
BRC-GS GLOBAL STANDARD FOR PACKAGING MATERIALS	ANNUALLY EVERY APRIL
HALAL CERTIFICATION	ANNUALLY EVERY SEPTEMBER
KOSHER CERTIFICATION, USA	ANNUALLY EVERY JANUARY
KOSHER-BADATZ CERTIFICATION	ANNUALLY EVERY JANUARY
ISCC PLUS CERTIFICATION	ANNUALLY EVERY JULY- AUGUST
SEDEX MEMBERSHIP	ANNUALLY
ECOVADIS - SUPPLIERS' CSR ASSESSMENT SILVER RECOGNITION LEVEL	ANNUALLY
Inspection by EFET	ANNUALLY (IT CAN ALSO BE CARRIED OUT ON AN EXTRAORDINARY BASIS)

Finally, our customers from Europe and America carry out self-assessment & audits at our Company's facilities, in order to ensure that the required high quality standards are met. The assessment process involves a variety of issues and where required, evidence and documents are sent.

## Identification and traceability

Smooth internal operation, efficient production management, reduction of related risks as well as targeted positioning in the business market, emphasize the importance of quality and reliability processes' transparency.

At the Company, we additionally maintain a sophisticated enterprise resource planning (ERP) through which:

-  An ID is created for each product, in the form of a barcode.
-  Production parameters are monitored in real time.
-  Access and retrieval of any information is facilitated.
-  All measured characteristics of the product are recorded.
-  The raw materials used for each product are recorded.
-  Extensive sample retention takes place per production lot.

Production information is recorded at every stage and is readily available to enable identification and traceability in the event of a product recall through an electronic system.

To ensure traceability, each lot is labeled with producer name/address, product name and corresponding numbering so that all production related data and quality control (Q.C.) records can be traced. At the same time, a sample preservation procedure is implemented

## Quality control

For each product category, a special quality characteristics' control protocol is applied, which is performed and recorded in the ERP. One of the most important controls is that of the migration of substances into food, as well as microbes. The Company's products are also tested by external certified laboratories.

The test results certify that the product lines comply with the general migration requirements of European Regulation 10/2011, for use in contact with all types of food.

### The basic Quality Control procedures are as follows:

The Quality Control department operates 24/7 and performs measurements of critical properties of the manufactured product, according to a specific control plan. The entire process is recorded in the Company's ERP, thus allowing full traceability and security.

In the event that the measurement of properties is found to be out of specification, the quantity of material in question does not proceed to the next stage. In this way, we ensure that all products sent to the customer meet the specifications.

#### Product recall

The Company, as required by the BRCGS system, has a specific approach to managing product quality and safety issues. In the event that there is a need to recall a specific product or lot, for which the Customer has informed the Sales Representative, a series of actions is initiated to investigate the causes of the problem.

These actions concern the identification, documentation, evaluation, isolation and handling of the product to be recalled, as well as the information of all interested functions.

#### Complaints management

The Company has an approved procedure for handling customer complaints, the aim of which is to provide quick and complete resolution and, consequently, to satisfy customer requests .



The procedure is implemented through electronic forms, «Customer Complaints Sheet» in which, after recording the following, the customer is contacted:

- 01 Product code, sales order, lot information.
- 02 Complaint Amount, Requested Credit Value.
- 03 Problem description.

In every case of complaint investigation, the relevant departments of the Company (such as the Production, Quality Assurance, Warehouse department) cooperate in order to collect the necessary information (such as data recorded in the Company's ERP, relevant documents, samples) and to follow the required corrective actions as the Company's goal is to eliminate complaints.

**With Quality Assurance FLEXOPACK succeeds:**

- Zero product recalls.
- Zero recorded incidents, fines or penalties of non-compliance regarding the health and safety impacts of its services.



**Economic value**



**Creating immediate economic value**

The Company during its operation creates or may create the following positive or negative impacts:

**Creating economic value**

Positive impacts from:

- Creating immediate economic value, from timely payment of taxes, payroll and payments to partners and suppliers.
- Through the economic activity that is created from the interested parties, the Greek presence in international markets as well as the participation in international exhibitions.
- From the potential creation of new indirect and induced job positions in different industries.

**Limited or negative distributed economic value**

Negative impacts from:

- Potential limited or negative direct economic value distributed to the local community due to possible reduced activities at the local level (e.g. sponsorships, social investments).
- Due to the potential reduction of employees as a consequence of the incorporation of technological changes.
- Due to the possible reduced recruitment of new employees.



At FLEXOPACK, we create direct economic value for our shareholders and stakeholders through our business activities, contributing to the economy, employment and society in general through targeted actions. Nationally, we contribute directly by creating new jobs, providing payroll, generating tax revenue to the State, payments to suppliers, but also by collaborating with stakeholders across our value chain. At the same time, we constantly aim to increase the direct financial flows to the interested parties (such as the increase of salaries, employee benefits, etc.).

In the context of ensuring the Group's Sustainable Development and in order to be able to generate value at a direct and indirect level, we systematically monitor the business risks that would affect our performance. We have developed a process for managing and evaluating financial and non-financial risks, through which the Company minimizes the negative impacts, ensuring its performance at a stable level.

2020	2021	
<b>REVENUE IN MILLIONS</b>		
<b>€96.95</b>	<b>€114.18</b>	<b>+17.8%</b>
<b>GROSS PROFIT IN MILLIONS</b>		
<b>€26.88</b>	<b>€28.39</b>	<b>+5.6%</b>

\* Eliminations that took place within the reference year are not included.

- a) Consolidated turnover in 2021 amounted to 114,181 million euro, compared to 96,953 million euro in 2020, noting a percentage increase of 17.77%.
- b) EBITDA in 2021 amounted at Group level to 18,548 million euro, compared to 20,697 million euro in 2020, reduced by 10.38%.
- c) EBT of the Group stood at 12,818 million euro for 2021, compared to 13,595 million euro in 2020, noting a decrease of 5.72%.
- d) Earnings after tax (EAT) for 2021 amounted to 10,407 million euro for the Group, compared to 10,378 million euro in 2020, presenting an increase of 0.28%.

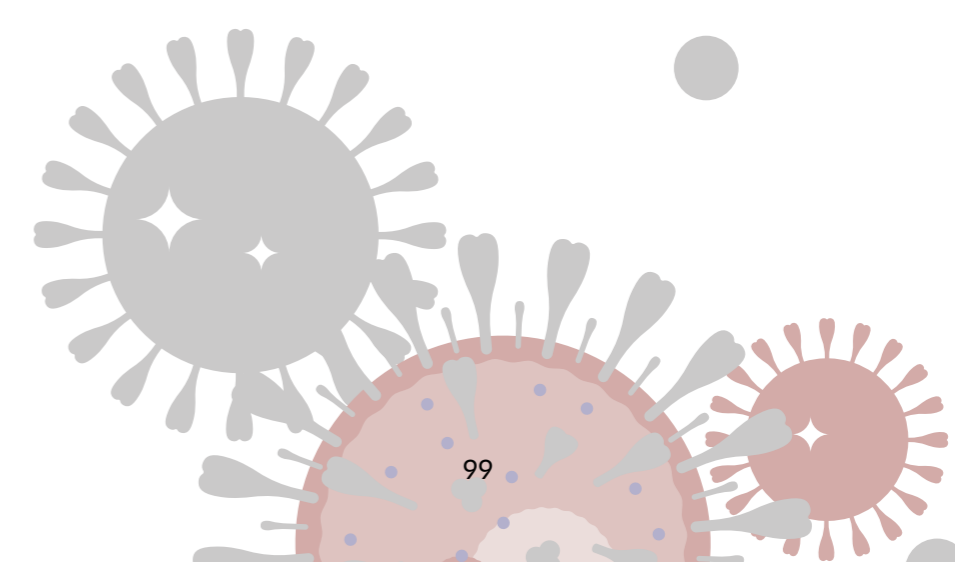
### Creating value during the pandemic COVID-19

The management of FLEXOPACK took measures and managed to protect not only the health and safety of its people, but also to ensure the operational continuity of all production units and the uninterrupted coverage of its customers' needs.

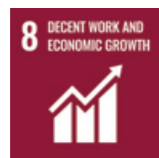
All the previous years and especially during the COVID-19 pandemic, our Company responded immediately to the intense challenges of the market, succeeding in maintaining profitability by expanding its extroversion, investing in new countries and new sustainable products.

It should be pointed out that in the following GRI 201-1 index, with respect to revenues eliminations that took place within the reference year are not included.

DIRECT ECONOMIC VALUE 2021 GENERATED AND DISTRIBUTED	(€ th.)
<b>DIRECT ECONOMIC VALUE GENERATED</b>	
Revenues	<b>145,189</b>
<b>DIRECT ECONOMIC VALUE DISTRIBUTED</b>	
Operating expenses	111,133
Payroll and Benefits to Employees	15,284
Payments to Financing organizations	1,495
Payments/Contribution to the State	2,896
Greece	2,669
Poland	227
Australia	0
Investments in Society	49
<b>Total</b>	<b>130,857</b>
<b>NON DISTRIBUTED ECONOMIC VALUE</b>	
Direct economic value generated	145,189
Direct economic value distributed	130,857
<b>Total non distributed economic value</b>	<b>14,332</b>



## Creating indirect economic value



Through our business activities, in addition to direct contribution, we generate and distribute indirect economic value and job positions throughout our value chain. Therefore, we create a positive impact on the Company itself but also in the local market, in multiple business segments and in society through various social actions.

### Social contribution

Through communication with stakeholders, the Company receives requests for support of various actions and programs, which it evaluates, plans and implements on a case-by-case basis. Requests for contributions include donations, sponsorships or social programs and are addressed either at the level of local communities or at the wider society.

In addition to our contribution to the economic development of local communities and employment, we support actions to strengthen the following areas:

- Education
- Health
- Culture
- Sports
- Entrepreneurship

In this context, donations were made to local bodies, non-governmental organizations, as well as to child protection facilities.

DONATIONS-SOCIAL ACTIONS 2021	Value (€)
Donations to local bodies	10,000
Donations to non-governmental organizations	9,243
Donations to child protection facilities	30,000
<b>Total</b>	<b>49,243</b>



# Governance



# 05

105 Organizational structure

108 Organization chart

118 Ensuring regulatory and business ethics

“The Code of Ethics and Ethical Conduct that is applied ensures the ethical principles and values, contributing to the protection of employees’ interests and the strengthening of the Company’s solvency.”

### Responsible corporate governance

FLEXOPACK, ensuring the principles of corporate governance, operates with reliability, responsibility and transparency. Applying best practices, it manages administration and auditing issues in order to limit business risks and achieve its goals. Through the Sustainable Development policy, it consolidates its presence on the international scene.

An important pillar of corporate strategy is the ensuring of regulatory compliance that is achieved through policies and procedures and the assurance of business ethics.



### Organizational structure

The Company implements a specific corporate governance system, through which it manages administration and auditing issues and for the achievement of its business goals.

The Company’s Regulation of Operation presents its organizational structure, taking into account its size and objective, as well as the corporate Policies and Procedures that it applies. The Regulation is fully harmonized with the provisions of article 14 of Law 4706/2020, on corporate governance, while during its preparation there were taken into account the Company’s Articles of Association, the provisions of the legal, normative and regulatory framework governing its operation and the Greek Corporate Governance Code adopted by the Company. Potential and existing negative impacts or other critical issues that may arise are communicated to the Board of Directors through meetings.

The Board of Directors is the highest executive body of the Company. Its composition and responsibilities are determined by the Company’s Articles of Association, the current legislative and regulatory framework, while at the same time the provisions of the Corporate Governance Code adopted by the Company are observed.



The Company's Board of Directors, among others, is responsible for:

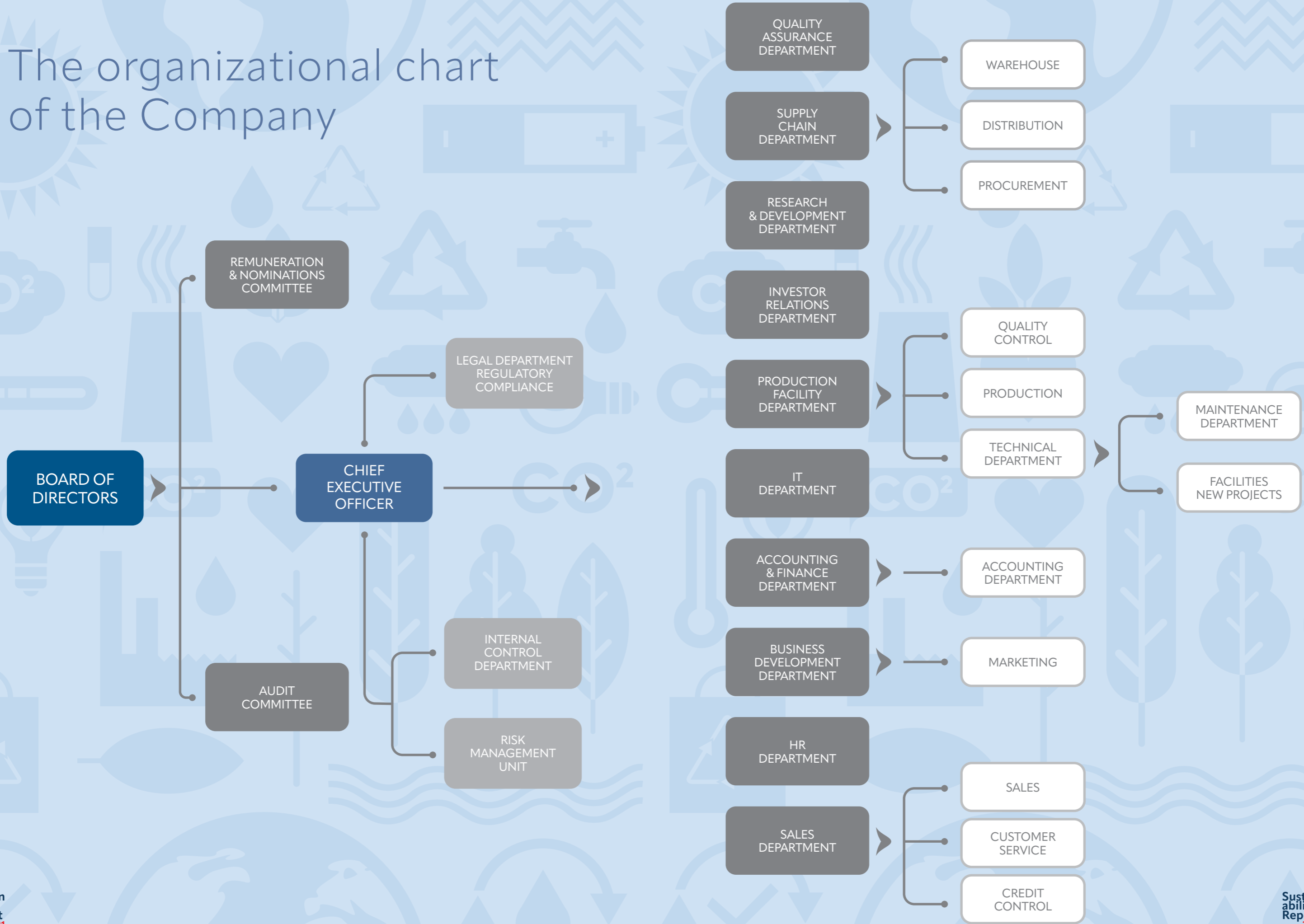
- Ensuring the adequate and efficient operation of the internal control system (which includes the operations of the Internal Control, Regulatory Compliance and Risk Management).
- The determination of values and strategic orientation of the Company, as well as the constant monitoring of their observance, ensuring their alignment with the corporate culture.
- Diffusion of values and corporate objective in all Policies, Procedures and behaviors within the Company, setting an example for the appropriate standards of conduct.
- The design and monitoring of the Company's strategy implementation and the approval and monitoring of its business plan.
- The determination of the level of the Company's exposure to the risks that it intends to undertake in context of achieving its purpose and in particular its long-term strategic goals.

TOTAL MEMBERS OF BOARD OF DIRECTORS		9
Chairman of the Board of Directors – non executive member *		<b>Georgios Ginosatis</b>
BOD COMPOSITION	TOTAL	PERCENTAGE
Female	3	33%
Non executive members	4	44%
Non executive members & independent members	3	33%

\* According to the Greek Corporate Governance Code, the chairman of the BoD is a non executive member.



# The organizational chart of the Company



### Corporate governance code

The Company, with the decision of its Board of Directors (BoD) dated 15/07/2021, has voluntarily decided to implement the Greek Corporate Governance Code of the Hellenic Corporate Governance Council (HCGC). The Greek Corporate Governance Code aims at the continuous improvement of the Greek Corporate institutional framework and wider business environment, as well as at the enhancement of investors' confidence both in terms of the totality of listed Companies and each one of them, and broadens the horizons of attracting investment funds.

### Committees

The Board of Directors of the Company has established committees that support its decision-making process, ensure the effective management of potential conflict of interest situations during this process and are accountable to the Board of Directors, if deemed necessary.

For more efficient management of the Company and support to the Board of Directors' work and in compliance with the provisions of articles 10-12 of Law 4706/2020, the following sub-committees have been established:

- Audit Committee
- Remuneration & Nominations Committee

Additional information is reported in the Annual Financial Report page 10-11 and in the Regulation of Operation page 11-13.



All applicable Policies and Procedures of FLEXOPACK for the reference year are displayed below:

- |  |   |
|--|---|
| 01 Policy and Procedure of Risk Management.  | 08 Privileged Information Management Procedure and Appropriate Public Update.   |
| 02 Recruitment and Evaluation Procedure for Senior Managers.                         | 09 Policy and Procedure for periodic evaluation of the Internal Control System. |
| 03 Procedure for Disclosure of Transactions by persons exercising managerial duties. | 10 Training Policy of the BoD Members and senior management.                    |
| 04 Dependency Disclosure Procedure.  | 11 Sustainable Development Policy.  |
| 05 Related Party Transactions Policy and Procedure.                                  | 12 Suitability Policy for the BoD Members.                                      |
| 06 Conflict of Interest Prevention and Management Policy and Procedure.              | 13 Policies on Violence and Harassment in the Workplace.                        |
| 07 Regulatory Compliance Process.  | 14 Remuneration Policy  |

### Conflict of interests

The Company adopts and implements the Policy and Procedure for the Prevention and Management of Conflict of Interest Situations with the aim of creating a framework of mechanisms and rules for the prevention and/or recognition and effective handling of conflict of interest situations between the Company and the own interests of the BoD members and of every executive of the Company or third person to whom responsibilities have been assigned by the Company's Board of Directors.

The Procedure clearly describes the obligations of the responsible persons, the potential conflict of interest situations and the mechanisms for preventing, identifying and dealing with conflict of interest situations.

The Chairman of the Board of Directors with the support of the Legal Department, the Remuneration and Nominations Committee, are charged with the responsibility of observing and implementing the above Procedure and in particular for dealing with real or potential situations of conflict of interest.

## Risk Management

The Company has established and implements a Risk Management Policy and Procedure which aims at managing promptly and effectively the risks that may have a negative impact on the achievement of its objectives. Risk Management is a systematic process for the Company that aims at the timely and effective identification, analysis, control, management and monitoring of every form of risk involved in the operation of the Company.

The stages followed during the annual Risk Management process are as follows:

- 01 Preparation of Risk Profile Review Proposals.
- 02 Submission of Risk Profile Review Proposals.
- 03 Conducting Risk Management Team Meetings.
- 04 Approval of Risk Profile and Action Plan.
- 05 Action Plan Monitoring - Reports.

The results of the Process are reflected in the Company's Risk Profile and Action Plan approved by the Board of Directors. The Audit Committee monitors the implementation of the Procedure as well as the progress of the activities of the Action Plan. The Company's Board of Directors has the overall responsibility for the risk management framework related to the operations and the achievement of the Company's objectives.

The Company's Management takes the decisions related to the risk assessment, plans and implements appropriate safety measures for their management, based on the risk-taking disposition of the Board of Directors. In addition, it is also responsible for the implementation of the Business Risk Management System in the day-to-day operation of the organization. It regularly evaluates the effectiveness and the need to adjust the risk management action plans in order to achieve optimal management.

In addition to the ordinary financial risks to which the group is exposed, the Company monitors on a permanent basis other risks that may affect its smooth operation:

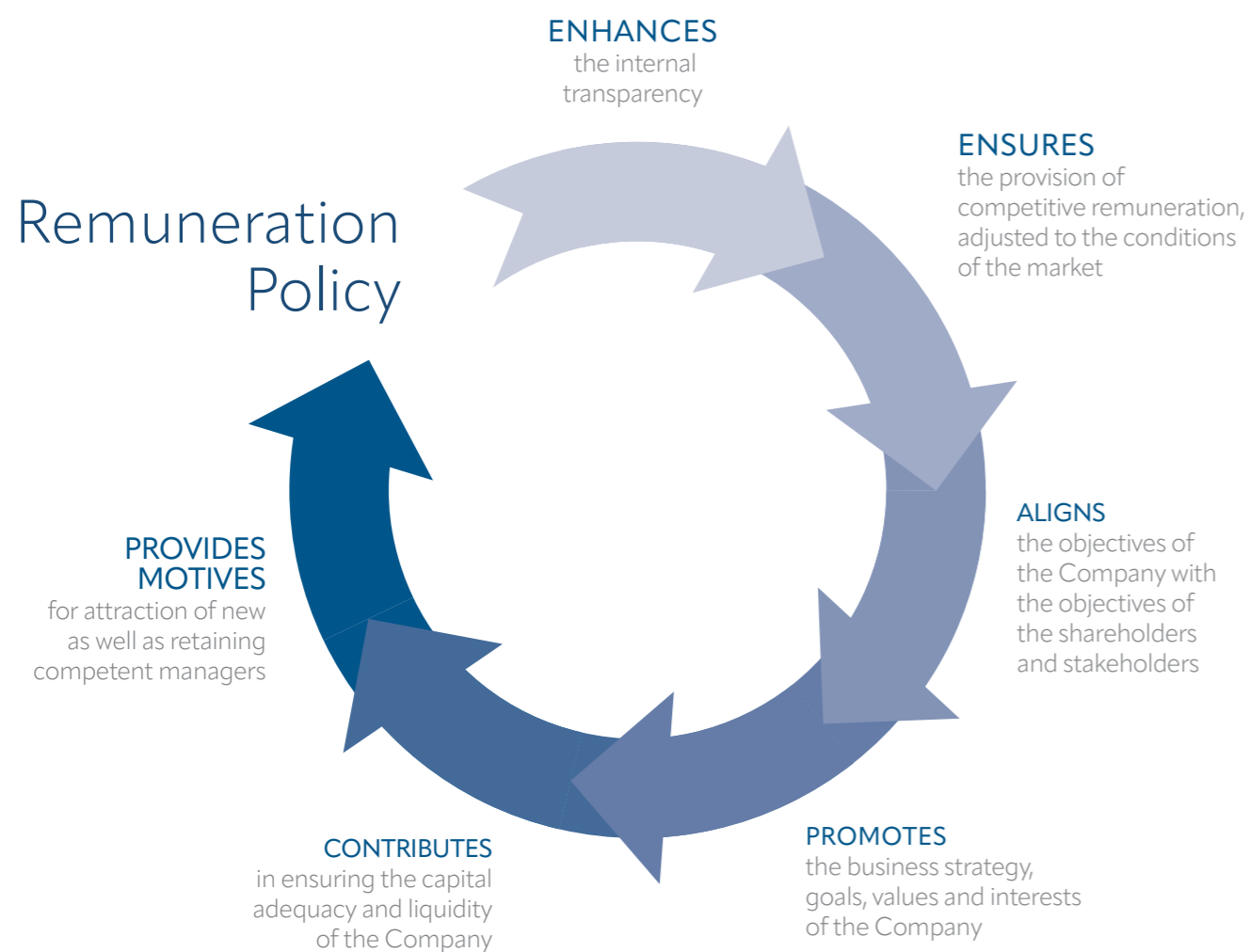
- 01 Risk of increased competition from foreign and domestic companies.
- 02 Risk of a decrease in demand due to general consumer recession.
- 03 Risk related to production costs.
  - risk of rising prices of raw materials
  - risk of electricity prices increase
- 04 Risks related to safety at work.
- 05 Environmental risks.
- 06 Risks related to the climate change.
- 07 Risk related to the spread of the pandemic COVID-19.

## Regulation of Operation - Remuneration and Nominations Committee

The Company has established a special Remuneration and Nominations Committee, which supports the Board of Directors in the preparation of the Remuneration Policy and Report, with the aim of attracting and retaining competent executives. It also ensures the submission of proposals to the Board of Directors for the selection of suitable persons for the position of the Board of Directors' member status, based on the existing Suitability Policy of the Company.

Suitability Policy includes:

- the general principles applied during the selection, replacement, representation or renewal of the BoD members' tenure.
- the evaluation criteria of the personal suitability that has been applied to all members of the BoD (executive, non executive, and independent non executive).
- the evaluation criteria for the collective suitability of the BoD members.
- the diversity criteria.
- the particular suitability assessment criteria of the BoD's members who participate in the individual committees of the Board of Directors.



Remuneration Policy

The Remuneration Policy was prepared with the aim of enhancing transparency and in order to ensure the fairness and proportionality of the remunerations and other benefits paid:

The objective of the Remuneration Policy is the promotion of the Company's values, culture and long-term interests as well as the proper and effective risk management, in order to achieve harmonization with market practices.

Sustainable Development Policies

Through Sustainable Development Policy, the Company establishes its vision to continue to be a company, which through a strong international presence contributes to Sustainable Development. This Policy is approved by the Board of Directors, is communicated to all of its personnel and it is included in the Company's Regulation of Operation. The Company publishes information on the individual actions carried out regarding the axes of Sustainable Development.

Sustainable Development is one of the axes of the Company's strategy and it is integrated into its business model. The framework that governs the Company is reflected in the Sustainable Development Policy that it applies and is based on the following axes:

- Corporate Governance
- Market
- Human Resources
- Environment
- Local Community

The Board of Directors monitors the Company's performance and recommends improvements in environmental, social and corporate governance (ESG) issues in order to generate value for the Group. Among other things, the Board of Directors supervises the integration of non-financial factors into business strategy and decision-making, aiming at the Group being capable of managing possible changes in the environment in which it operates.






More information can be found in the Annual Financial Report 2021, pp. 33-35, 80-81 and in the Regulation of Operation, p. 26.



## Management of Sustainable Development issues

The Board of Directors is informed and supervises the issues of Sustainable Development, ensuring compliance with the relevant principles and commitments.

### Sustainable Development Issues:

-  Full management of Sustainable Development issues.
-  Collection of the data required for the publication of the annual Sustainable Development Report, as well as the non-financial information within the Management Report.
-  Continuous communication with stakeholders on the implementation of initiatives and the management of Sustainable Development issues.
-  Supporting society through targeted actions.
-  Drawing policies and procedures, as well as coordination for the implementation of programs related to Sustainable Development issues.

## Updating the Board of Directors on Sustainable Development issues

The Board of Directors, in order to strengthen the effectiveness of its strategy in issues of Sustainable Development, it has proceeded with the completion of seminars and the attending of necessary educational and informational programs, organized by the Association of Greek Manufacturers of Packaging and Materials (AGMPM), by SEV (Hellenic Federation of Enterprises), and by the Athens Stock Exchange.



## Ensuring regulatory compliance and business ethics

The Company during its operation creates or may create the following positive or negative impacts:

### Ensuring the regulatory compliance and business ethics

Positive impacts through:

- Ensuring the regulatory compliance and business ethics, through zero incidents of corruption and anti-competitive behavior through the communication of the Code of Ethics and Ethical Conduct to all the employees and the potential enhancement of transparency regarding the non-financial data.

### Insufficient regulatory compliance and business ethics

Negative impacts by:

- Potential failures to implement the principles, policies and procedures related to regulatory compliance and business ethics by employees, partners and suppliers of the company. Possible insufficient update of stakeholders on issues of the Code of Ethics and Ethical Conduct and potential insufficient assessment of suppliers based on environmental and social criteria.

Regulatory compliance and business ethics are at the core of our corporate decisions and business operations and are inseparable linked to our values, mission and goals. Our compliance with the current legislative framework, the simultaneous monitoring of continuous legislative developments and the assurance of business ethics are a priority of our Company in order to operate transparently both internally and externally, with our stakeholders.

The Company's Regulation of Operation, which constitute a set of principles and rules of conduct, including regulatory compliance, is harmonized with the provisions of article 14 of Law 4706/2020, on corporate governance, while during its preparation there were taken into account the Company's Articles of Association, the provisions of the legal, normative and regulatory framework governing its operation and the Greek Corporate Governance Code adopted by the Company.

### Regulatory compliance policies and procedures<sup>14</sup>

The Company adopts policies and procedures that describe and explain regulatory requirements as well as the mechanisms to ensure the Company's compliance. These policies and procedures include but are not limited to:

- Obligation Procedures towards The Athens Stock Exchange - Hellenic Capital Market Commission.
- Privileged Information Management Procedure and Appropriate Public Update.
- Conflict of Interest Policy and Procedure.
- Procedure for Disclosure of Transactions.

### Regulatory Compliance Process

The Company records all of the policies and mechanisms it adopts in order to prevent, identify, address and monitor regulatory compliance issues in the Regulatory Compliance Process. The Company's Board of Directors has overall supervisory responsibility for the implementation of the Procedure, while the Audit Committee approves and monitors the implementation of the annual regulatory compliance action plan which includes the periodic, and as the case may be, extraordinary actions to achieve compliance.

### Monitoring of Regulatory Compliance

The Company's Legal Department, among other responsibilities, is responsible for supervising and managing issues of ethical behavior and regulatory compliance that arise in the context of the Company's operations as well as the relevant responsibilities included in the Regulatory Compliance Process.

<sup>14</sup> More information about the Policies and Procedures governing regulatory compliance at Flexopack is included in its Regulation of Operation.

At the same time, the Company's Internal Control System (ICS) includes policies, procedures and mechanisms, including risk management and regulatory compliance that contribute to the safe and efficient operation of the Company.

The Company, in the context of ensuring regulatory compliance, is based on the following principles:

- Utilization of methods to assess non-compliance risks.
- Implementation of policies, procedures and controls for the effective operation of the Company.
- Creating a climate of confidentiality with its partners.
- Commitment to harmonious and transparent operation in accordance with the Code of Ethics and Ethical Conduct.

## Business ethics

### ● Code of Ethics and Ethical Conduct

FLEXOPACK conducts all of its activities with integrity and in accordance with the Code of Ethics and Ethical Conduct that it has adopted and governs the whole set of interactions among employees, external partners and the wider environment of the Company, while at the same time it contributes to the achievement of its objectives. The Code is a guidance tool for demonstrating good professional conduct, ethical conduct and integrity.

It is noted that the Code is applied by the Company's Management and personnel, while the Regulatory Compliance Officer regularly assesses the adequacy of the applicable Code and guides the Management and personnel of the Company for its effective implementation.

The Code includes, among others, the following thematic sections:

### ● Bribery and corruption

As stated in the Code, in the Company's obligations towards third parties, the Company maintains high standards of ethics and integrity and complies with the requirements of national and international legislation to combat bribery and corruption. Every employee of the Company has an explicit obligation not to utilize the power and the position for personal gain. The Company has zero tolerance to any situation or behavior of active or passive bribery.

### ● Competition Law

The Company, in the context of establishing a relationship of trust with its customers and network, always complies with all applicable competition law rules and does not seek to gain an advantage through unfair business practices or illegal actions.

### ● Personal data protection and confidentiality

The Company applies a personal data protection policy in accordance with existing legislation and the General Data Protection Regulation (GDPR15) in the countries in which it operates for all natural persons. The policy refers to the personal information that our Company processes as an employer, prospective employer, supplier of products and services, for purposes related to promotion as well as during operation and its usual activity as a manufacturer of flexible packaging products. The policy mentions, among others:

- The type of data.
- The special categories of data.
- The collection sources.
- The purpose for which the data is processed.

<sup>15</sup> General Data Protection Regulation (GDPR) Compliance Guidelines

In 2021, there were no documented complaints and denunciations about violations of customer privacy and data loss. In addition, there have been no incidents of detected leaks, theft or loss of customer data.

More information on the Privacy Policy is available on the Company's website.

### Implementation of the Code and monitoring of implementation

The Code, to which all employees have access via the Intranet platform, is implemented by the Company's Management and personnel, and the Company ensures that key business traders and partners (suppliers, customers, etc.) follow the same minimum standards of ethics and business conduct.

As part of the appropriate use of the Code, the following communication channels are available for reporting incidents of fraud, bribery, corruption, conflict of interest, harassment at work and for other cases of non-compliance with the Code of Ethics and Ethical Conduct:

- Anonymous or named employee complaint forms

More information on the Code of Ethics and Ethical Conduct is available on the Company's website.

### The Company's commitment to high standards of ethics and integrity

Our Company aims at its continuous compliance with the ever-changing regulatory and legal framework as well as at the continuation of its operation by ensuring an environment of integrity, ethics and compliance of all its parts with the Company's regulations. In addition, the Company has implemented a plan to improve the disclosure of its non-financial data as well as the systematic monitoring of its impacts on the economy, environment and society. At the same time, it examines the integration of social, environmental and business ethics criteria in the evaluation of suppliers as mentioned in the Supply Chain Section.

During the reference period there were no reports on:

- Confirmed incident of corruption.
- Confirmed incident of corruption resulting in the removal or disciplinary action of employees.
- Confirmed incident of corruption which resulted in the termination or non-renewal of the contract with suppliers/partners.
- Court case related to corruption against FLEXOPACK or its employees.
- Cases for which fines were imposed.
- Cases for which non-monetary sanctions were imposed.
- Confirmed incidents of non-compliance with laws and regulations.

In addition, during the reporting period there were no financial losses caused as a result of violations of business ethics and there were no incidents of legal action or financial sanctions for anti-competitive conduct, antitrust or monopolistic practices, issues of corruption, bribery, cartel or fixing prices.







GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	MENTION	PAGE OF THE REPORT
GENERAL DISCLOSURES			
GRI 2	2-20 Remuneration determination process	5.1 Corporate governance	
	2-21 Annual index of total compensation	4.1 Employment 5.1 Corporate governance	73
	2-22 Statement for the sustainable development strategy	5.1 Corporate governance	7
	2-23 Policy commitments	5.1 Corporate governance 5.2 Ensuring regulatory compliance and business ethics	
	2-24 Incorporating policy commitments	5.1 Corporate governance	
	2-25 Procedures for remediation of negative impacts		
	2-26 Mechanisms for seeking advice and collecting concerns		
	2-27 Compliance with laws and regulations	5.2 Ensuring regulatory compliance and business ethics	118
	2-28 Member Associations	1.3 Partnerships, participations and distinctions	31
	2-29 Stakeholder approaching	2.1 Cooperation with stakeholders	34
2-30 Collective labor agreements	4.1 Employment	69, 110	
MATERIAL ISSUES			
GRI 3	3-1 Process for selecting material issues	2.2 Materiality analysis	32, 36
	3-2 List of material issues	2.2 Materiality analysis	38, 39, 40, 41
RAW MATERIALS NATURAL RESERVES			
GRI 3	3-3 Management of material issues	3.1 Natural reserves of raw materials and ground	45, 46, 47
FLEXOPACK Index	Raw materials	3.1 Natural reserves of raw materials and ground	49

OMISSION			GRI SECTOR STANDARD REF. NO.
REQUIREMENTS OMITTED	CAUSE	EXPLANATION	
GENERAL DISCLOSURES			
Omission a i, ii b ii		The Company is in the process of meeting policy commitments.	
Omission a ii, iii, iv		The Company is in the process of integrating policy commitments	
Omission		The Company is in the process of creating corresponding procedures.	
Omission		Until the reporting year, there is no other mechanism for recording concerns, apart from the complaint recording process.	
MATERIAL ISSUES			
NATURAL RESERVES OF RAW MATERIALS			

GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	MENTION	PAGE OF THE REPORT
GROUND			
GRI 3	3-3 Management of material issues	3.1 Natural reserves of raw materials and ground	50, 51
WASTE			
GRI 306 Waste 2020	306-1 Waste generation and significant waste-related impacts	3.1 Natural reserves of raw materials and ground	55
	306-2 Management of significant waste-related impacts	3.1 Natural reserves of raw materials and ground	55
	306-3 Categories of waste generated	3.1 Natural reserves of raw materials and ground	55
	306-4 Waste diverted from disposal through the recovery process	3.1 Natural reserves of raw materials and ground	55
	306-5 Waste directed to disposal	3.1 Natural reserves of raw materials and ground	55
INNOVATION			
GRI 3	3-3 Management of material issues	3.2 Innovation	56, 57, 58
FLEXOPACK Index	Innovative projects	3.2 Innovation	60
ATMOSPHERE AND CLIMATE			
GRI 3	3-3 Management of material issues	3.3 Atmosphere and climate	61, 61, 63
ENERGY			
GRI 302 Energy 2016	302-1 Energy consumption within the organization	3.3 Atmosphere and climate	64, 65
	302-2 Energy consumption outside the organization		
	302-3 Energy intensity	3.3 Atmosphere and climate	65
	302-4 Reduction of energy consumption	2.2 Materiality analysis	
	302-5 Reducing the energy requirements of products and services	2.2 Materiality analysis	

OMISSION			GRI SECTOR STANDARD REF. NO..
REQUIREMENTS OMITTED	CAUSE	EXPLANATION	
GROUND			
WASTE			
INNOVATION			
ATMOSPHERE AND CLIMATE			
ENERGY			
Omission	Non available/incomplete information	Until the reference year, there is no record of energy consumption outside the organization.	
Omission	Non available/incomplete information	Until the reference year, there is no record of energy consumption reduction.	
Omission	Non available/incomplete information	Until the reference year, there is no record of reduction in products and services' energy requirements.	

GRI CONTENT INDEX

STANDARD GRI	DISCLOSURE	MENTION	PAGE OF THE REPORT
EMPLOYMENT			
GRI 3	3-3 Management of material issues	4.1 Employment	71
GRI 401 Εργασία 2016	401-1 Recruitment of new employees and employee rotation	4.1 Employment	69, 74, 75, 76
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	4.1 Employment	69
	401-3 Parental leave	3.1 Natural reserves of raw materials	
TRAINING			
GRI 3	3-3 Management of material issues	4.2 Training	77
GRI 404 Training and education 2016	404-1 Average of training hours per employee	4.2 Training	80
	404-2 Programs for the development of employees and programs to support employees who retire or are laid off	4.2 Training	
	404-3 Percentage of employees receiving regular performance and career development reviews	4.2 Training	80
HEALTH, SAFETY AND WELL BEING			
GRI 403 Υγεία και ασφάλεια στην εργασία 2018	403-1 Occupational health and safety management system	4.3 Health, safety and well-being	81
	403-2 Risk identification, risk assessment and incident investigation	4.3 Health, safety and well-being	81
	403-3 Occupational health services	4.3 Health, safety and well-being	81
	403-4 Participation, consultation, and communication with employees on occupational health and safety at work	4.2 Training	81

OMISSION			GRI SECTOR STANDARD REF. NO.
REQUIREMENTS OMITTED	CAUSE	EXPLANATION	
GROUND			
Omission	Non available/incomplete information	Until the reference year, there is no particular recording of the data.	
TRAINING			
Omission	Non available/incomplete information	Until the reference year, the average training hours per employee level has not been recorded.	
Omission	Non available/incomplete information	Up to the reporting year, there is no particular record of the programs provided to employees	
HEALTH, SAFETY AND WELL BEING			

ΠΙΝΑΚΑΣ ΠΕΡΙΕΧΟΜΕΝΩΝ GRI

GRI STANDARD	DISCLOSURE	MENTION	PAGE IN THE REPORT
HEALTH, SAFETY AND WELL BEING			
GRI 403 Health and safety at work 2018	403-5 Employee training in occupational health and safety	4.3 Health, safety and well-being	81
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This Report constitutes the 3rd annual Sustainable Development Report of FLEXOPACK. ERNST & YOUNG (GREECE) Certified Auditors - Accountants S.A. bears no responsibility towards any third party for the content of this Report. Through this, we aim to inform our stakeholders about the Sustainable Development issues related to our Company's business model, the way they are managed, as well as our performance in them.

This Report includes only the companies based in Greece, Poland and Australia, which participate in the turnover with a percentage greater than 75% and in which the parent company FLEXOPACK SA participates with a percentage of 100%. The subsidiary companies, which are included in the Financial Report of FLEXOPACK S.A., (01/01/2021-31/12/2021) which is the parent Company of the Group, are presented in the "Subsidiary companies" section.

This Report, which concerns the financial year 2021 (1.1.2021 – 31.12.2021) and it was published in 2023, was prepared in collaboration with the Climate Change and Sustainable Development Services department of EY Greece and has been prepared in agreement with the new standards for preparing Sustainable Development reports, in accordance with the GRI Standards, the renewed (2022) ESG Information Disclosure Guide of the Athens Stock Exchange, while taking into account the Company's contribution to the achievement of the Sustainable Development Goals (SDGs) of U.N. The responsibility for the calculation, collection and integration of the quantitative data, as well as the responsibility for the accuracy and completeness of the quantitative and qualitative information included in the Report, FLEXOPACK is responsible.

The GRI content table is available on pages **126-135** and the content table of ESG indices of the Athens Stock Exchange on pages **136-137**.

The Company has not proceeded with external assurance of the content of the Report. We recognize the importance of this process and we are considering of obtaining external assurance for our next Reports.

For any reference regarding the initiatives we undertake in the field of Sustainable Development, as well as for questions regarding this Report and its content, you can contact the Company at T: +30 210 6680000, E: info@flexopack.com.



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