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Date	01/07/2019	Status	In force
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Author	Director Human Resources. Ortega Javier	SIGNED 
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Summary of modification	Annual revision 2018
Annuls and replaces	2017 Progress report

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## About us

CTL-TH Packaging S.L.U was founded in 1964, with headquarters in Vitoria-Gasteiz (Spain) and is a trading company in the form of a single-member limited company, belonging to Corporación Juan Celaya, S.L.

Its governing body is the company's Board of Directors. The CEO of the CTL-TH Packaging Group reports to the Board of Directors, which also heads an Executive Committee made up of the General Managers, or their representatives, of the various business divisions. Each division has a management committee appropriate for its activity.

**Name of the organisation:** CTL-TH Packaging S.L.U

**Address:** Hermanos Lumiere 1, Miñano (Álava)

**Senior official:** Imanol Sánchez Álvarez

**Date of joining:** 30/07/2014

**Number of people:** 600

**Sector:** Chemicals

**Activity, main brands, products and/or services:**

Design, development, production and marketing of flexible plastic and metal-plastic tubular containers, closures and components for such containers.

**Sales / Revenue:** €70,000,000


**Significant financial assistance received from the government:** 94.000 €.

**Countries in which it has a presence (where the organisation has most of its activity) and markets served:**

France, Spain, USA, Italy, Germany, United Kingdom, Northern Ireland, Belgium, Netherlands, Sweden, Denmark, Portugal, Peru.





<http://www.tuboplastctl.com/>

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## Awards and recognitions

The CTL-TH Packaging group has long been known as a company focused on technological and product innovation, the development and well-being of its people and its commitment to society.


Because of this and by way of example, we highlight some of the distinctions we have received as a company in recent years.

<p>ETMA</p> <p>Best plastic tube</p> <p>Caudalie (PCR tube with wooden cap)</p> <p>2015</p>	 <p>European Tube Manufacturers Wooden cap Tube of the year 2015</p>
<p>ETMA</p> <p>Best prototype tube</p> <p>ESTube holographic effects</p> <p>2015</p>	 <p>European Tube Manufacturers ESTube Holographic Tube of the year – prototype 2015</p>

<p>Yanbal Customer</p> <p>“Very Important Partner 2015” award</p> <p>2015</p>	 <p>Yanbal Very Important Partner Award 2016</p>
<p>ETMA</p> <p>Best prototype tube</p> <p>ESTube "Be Unique" offset digital printing with serialisation (decoration, number &amp; QRCode unique to each tube)</p> <p>2016</p>	 <p>European Tube Manufacturers ESTube Digital Offset Tube of the year – prototype 2016</p>


<p>Alava Province</p> <p>Most Innovative Company Award (medium and large enterprise category)</p> <p>2016</p>	 <p>PREMIOS A LA INNOVACIÓN EN ALAVA AFARIADAKO BERRIKUNTZARAKO SARBAN Parite</p> <p>Premios a la Innovación en la mediana y gran empresa Berrikuntzarako sarbia, enpresa ertain eta handian</p> <p>Most Innovative Company In Alava – Basque Country Side 2016</p>
<p>Mutualia</p> <p>Company with an exemplary record in its occupational risk prevention policies and methods</p> <p>2017</p>	 <p>TURCOPIACT IBERIA S.A</p>
<p>Packaging Innovation Fair in Madrid</p> <p>IPA Awards honouring CTL-TH Packaging in the categories for Innovation and Sustainability in Packaging</p> <p>2017</p>	 <p>IPAAWARDS INSPIRATIONAL PACKAGING</p> <p>Spritz MASQUE EMBELEISSEUR</p> <p>LEA NATURE MASQUE EMBELEISSEUR Cheveux secs ou crépus Argan, Jus de Bio Mélange végétal</p>






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<p>San Prudencio Workers Foundation</p> <p>A company recognised for its painstaking work, quality, know-how, contribution to society and because it is a genuine models to be emulated in the province of Alava.</p> <p>2017</p>	
<p>ETMA</p> <p>Forms of Luxe</p> <p>Best Innovative Partnership</p> <p>2017</p>	
<p>Ecollecte</p> <p>Solidarity Recycling Certificate</p> <p>2017</p>	
<p>IPA Awards</p> <p>Innovation and Sustainability in Packaging</p> <p>2017</p>	



<p>Estée Lauder</p> <p>Supplier Excellence Award New Packaging Innovation</p> <p>2018</p>	
<p>HP Indigo</p> <p>Inkspiration Awards – Flexible Tubes</p> <p>2018</p>	
<p>EcoVadis</p> <p>CTL-TH Packaging, company among the top 5% of companies rated by EcoVadis in our sector.</p> <p>2019</p>	
<p>ETMA</p> <p>Prototype Category for our sustainable approach to the ESTube</p> <p>2019</p>	

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<p>HP Indigo</p> <p>Inkspiration Awards – Flexible Tubes</p> <p>2019</p>	
<p>Customer: Puig</p> <p>Acknowledgement for the EcoVadis evaluation</p> <p>2019</p>	

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## Our Commitment

We are delighted to announce the renewal of our commitment to the United Nations Global Compact via this Progress Report.

From the outset, we have always made it a priority to imbue our company with a strong sense of corporate responsibility. In keeping with this idea, in 2014 we joined the Global Compact in support of the implementation of the 10 principles.

In the CTL-TH Packaging Group, we understand that CSR is an intrinsic and fundamental part of our activity as a company.

The scope of this report is limited to the companies CTL-TH Packaging, Tuboplast, CTL Packaging and CTL-TH Engineering.

Our Vision: To offer innovative and global packaging solutions that create identity and distinction in our clients, their consumers and in society.

The CTL-TH Packaging group releases the 2018 progress report annually through the corporate website and the Global Compact Network website, directly to the management of the companies of the CTL-TH Packaging group.



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



30 July 2014

H.E. Ban Ki-moon  
Secretary-General  
United Nations  
New York, NY 10017  
USA

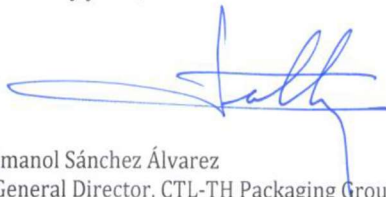
Dear Mr. Secretary-General,

I am pleased to confirm that CTL-TH Packaging S.L.U. supports the ten principles of the Global Compact on human rights, labour, environment and anti-corruption. With this communication, we express our intent to implement those principles. We are committed to making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Millennium Development Goals. CTL-TH Packaging S.L.U. will make a clear statement of this commitment to our stakeholders and the general public.

We recognize that a key requirement for participation in the Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the ten principles. We support public accountability and transparency, and therefore commit to report on progress within *one year* of joining the Global Compact, and *annually* thereafter according to the Global Compact COP policy. This includes:

- A statement signed by the chief executive expressing continued support for the Global Compact and renewing our ongoing commitment to the initiative and its principles. This is *separate* from our initial letter of commitment to join the Global Compact.
- A description of practical actions (i.e., disclosure of any relevant policies, procedures, activities) that the company has taken (or plans to undertake) to implement the Global Compact principles in each of the four issue areas (human rights, labour, environment, anti-corruption).
- A measurement of outcomes (i.e., the degree to which targets/performance indicators were met, or other qualitative or quantitative measurements of results).

Sincerely yours,



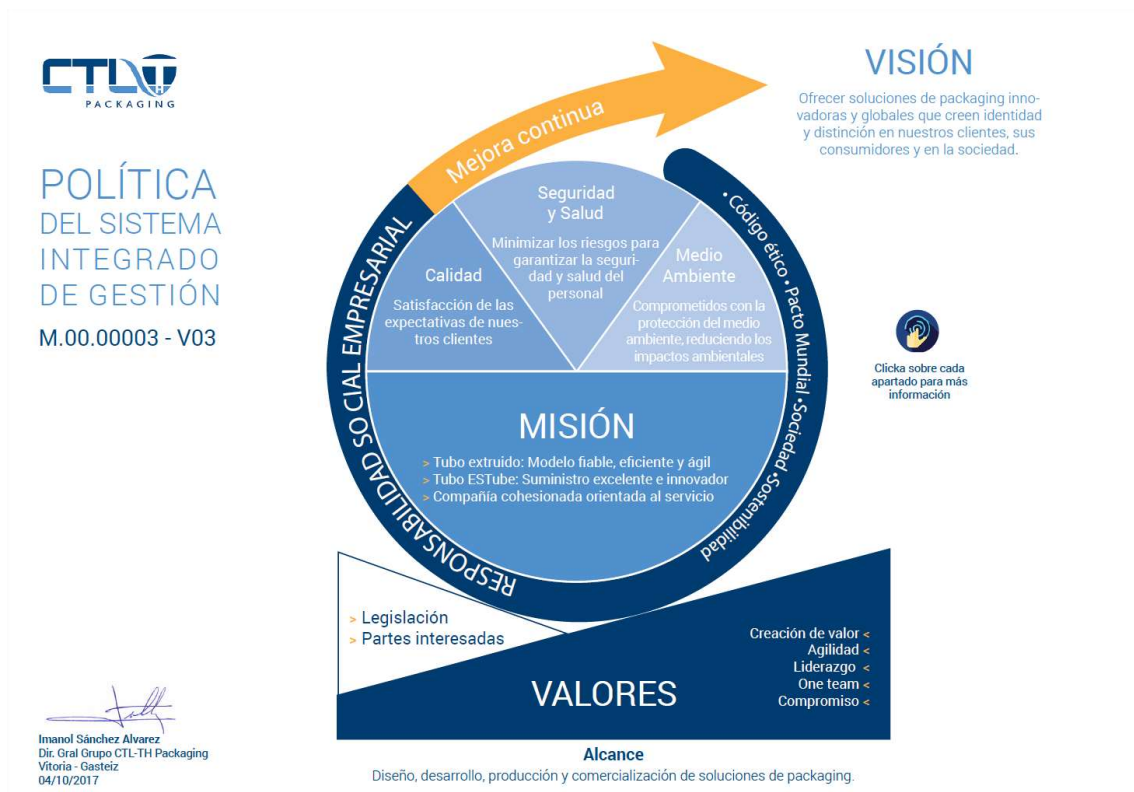
Imanol Sánchez Álvarez  
General Director, CTL-TH Packaging Group

## Strategy and governance


### Policy

Within the framework of the company's current 2017-2021 Strategic Plan, our POLICY integrates the elements of vision, mission and values with the expectations of our stakeholders in terms of ethical, social and environmental responsibility.

In addition to matters related to the business strategy, first level objectives have been established: work to achieve a cohesive organisation with a clear customer orientation, in which the aspects of transparency, information, participation and commitment of personnel will be key areas of work in the coming years.



[http://www.tuboplastctl.com/newweb/wp-content/uploads/2018/03/Politica-CALIDAD\\_esp\\_interactivo-1.pdf](http://www.tuboplastctl.com/newweb/wp-content/uploads/2018/03/Politica-CALIDAD_esp_interactivo-1.pdf)

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### Code of Ethics

The CTL-TH Packaging group has defined and implemented a company Code of Ethics.

All the people who belong to the CTL-TH Packaging Group undertake to respect, in all their activities, the fundamental rights of individuals and the civil liberties recognised by national and international agreements, establishing the obligation to carry out all their activities with total respect for human dignity.

The firm objective of the CTL-TH Packaging Group's Code of Ethics is to establish the guidelines, values and principles by which the behaviour of the organisation's personnel must be governed, with regard to the company's relationships with stakeholders, both in terms of the company's employment activity with the Staff and its relationships with customers, suppliers and external collaborators, shareholders, public and private institutions and society in general.

This Code of Ethics is based on the definition of the Mission, Vision, Values and Principles defined by the CTL-TH Packaging Group and represents the guidelines for ensuring appropriate behaviour in the professional conduct of the people who are part of the Staff.

It also requires suppliers, customers and external companies with which it has commercial dealings to respect these principles, and will establish this requirement as a further criterion for their selection and for the continuation of such business dealings.


The Code of Ethics defines specific action guidelines in the following areas:

1. Fundamental Rights
2. Individual respect
3. Equal opportunity and non-discrimination
4. Safety and health
5. Protection and safeguarding of the corporate brand, image and reputation
6. Respect for the environment
7. Consumption of alcohol and drugs
8. Tidiness and cleanliness of the work station
9. Patents and copyright
10. Money laundering
11. Bribes, gifts and courtesies
12. Use of company assets
13. Conflicts of interest
14. Customer relations
15. Relationships with suppliers and collaborators
16. Compliance with standards



<http://www.tuboplastctl.com/newweb/wp-content/uploads/2018/05/Código-ético.pdf>



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## Methodology

In order to reaffirm our commitment, the CTL-TH Packaging group has established and defined the most important issues to be included in this Progress Report as follows:

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

Then, we reviewed the **policy** situation for each of the principles, making a **diagnosis and follow-up** and defining the **actions**.

Lastly, for 2018, we included the contents of the **Sustainable Development Goals** (SDG) in our policy and report.

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## Stakeholders

This Progress Report is based on the stakeholder reporting methodology. The concept of the stakeholder is key to understanding CSR. The complexity and the dynamics of the current business environment have called for a solid commitment to the various stakeholders who are directly or indirectly affected by the business mission.

Identifying stakeholders and their expectations are aspects that facilitate the full implementation of CSR within any organisation.

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

The CTL-TH Packaging Group has produced the following Progress Report by selecting the most prominent stakeholders of its organisation, and identifying the most important challenges for the selected stakeholders as well as their needs and expectations.

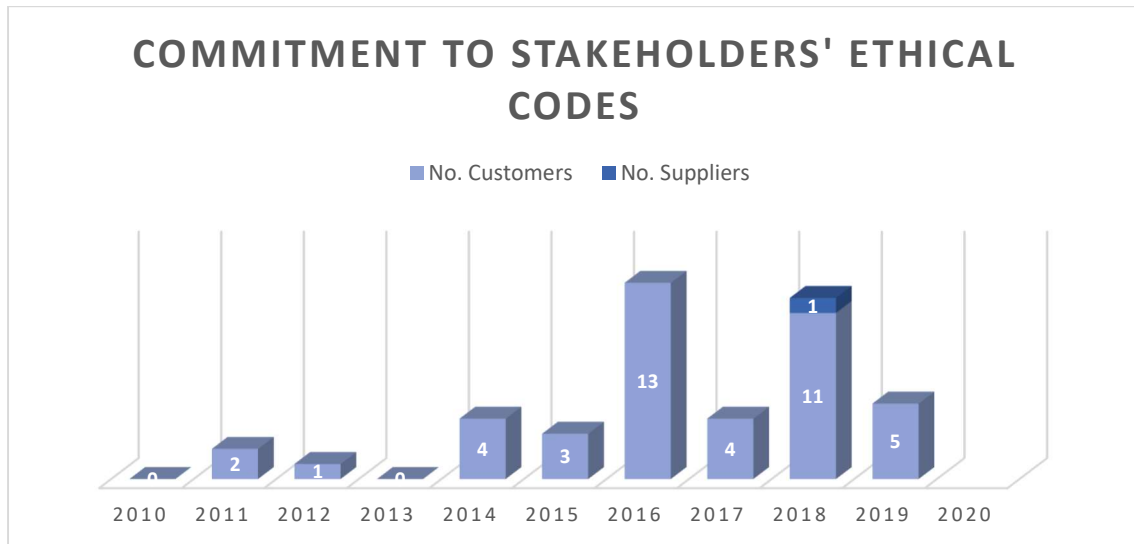
From all the stakeholders identified (Shareholders, Agents, Associations, Training Centres, Technology Centres, Competition, Foundations, Regulator, Trade Unions, Society and the Community), this report will evaluate the 3 groups with the greatest impact on the definition of our management and corporate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

Below is a definition of the systems established to collate the needs and expectations as well as the risks identified for each of these 3 Stakeholders and which allow us to define the elements for the preparation of this report.

## Clients

Their needs and expectations are compiled via:

- 1) Our commitment to the **Codes of Conduct or Ethics** of our clients.



- 2) **EcoVadis Platform** which we belong to in order to give our customers a vision of our commitments in terms of CSR.
- 3) **Visits, audits, meetings and business reviews** with our clients regarding quality, environmental, prevention and CSR issues.
- 4) **Active monitoring** that we carry out (client websites, magazines, exhibitions...)

## Staff

The identification of their needs and expectations is carried out through various channels such as periodic communication meetings with personnel, satisfaction and work environment surveys, meetings with staff representatives and with the prevention officers.

In 2018, following the approval of a new Strategic Business Plan, one of the strong elements of the mission was to "Consolidate a cohesive company model based on outstanding customer service".

## Suppliers

The identification of needs and expectations is carried out through activity or sector forums in which we jointly participate, and through direct suggestions made as part of our quality management system through the recording of incidents, non-conformities and through supplier audits, visits, quality, environmental, prevention and CSR audits, as well as awareness-raising meetings (Business Review, etc.) and, lastly, through active monitoring (suppliers' and competitors' websites, magazines, trade fairs, etc.).

## ANALYSIS

### POLICIES

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

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

### ASSESSMENT / MONITORING AND MEASUREMENT OF IMPACT

The assessment allows us to analyse the relationship between stakeholders and our company with regard to the issues contained in the 10 principles.

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


In this way it is possible to know which policies and actions should be taken for each Principle and which objectives should be set.

By using the appropriate indicators, monitoring allows us to provide the tools to supervise compliance with policies and helps to detect faults in the management system for its subsequent improvement.

### ACTIONS

Once the necessary policies have been formulated and the diagnosis has been made, the actions will help us to implement these policies.

The actions will help the organisation to shape the policies developed and minimise the risks detected. The actions are planned over time and designed with the target stakeholder in mind.

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**Moving from Principles to SDG (Sustainable Development Goals)**

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

Declaration	Principle	No.
Human Rights	To support and respect the protection of Human Rights.	<b>P1</b>
	To not be complicit in the violation of human rights.	<b>P2</b>
Employment Standards	To support freedom of unionisation and collective bargaining.	<b>P3</b>
	To support the elimination of all forms of forced or coerced labour.	<b>P4</b>
	To support the eradication of child labour.	<b>P5</b>
	To support the abolition of discriminatory practices.	<b>P6</b>
Environment	To maintain a preventive approach that benefits the environment.	<b>P7</b>
	To encourage initiatives that promote greater environmental responsibility.	<b>P8</b>
	To encourage the development and diffusion of environmentally friendly technologies.	<b>P9</b>
Fighting Corruption	To work against all forms of corruption.	<b>P10</b>


In the 2018-2019 period, this report includes the concepts derived from the 10 principles, with a new format that is incorporated into the current SDG structure.



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


	<p>Goal 3 aims to improve the health and well-being of the population in order to reduce mortality and the number of diseases. SMEs can contribute by promoting healthy lifestyles among the Staff and by having occupational health and safety systems. SMEs in the food or healthcare sector can have a greater impact.</p>
	<p>Goal 4 seeks to ensure quality education for all, promoting the technical and vocational training necessary to gain access to employment and promoting education based on sustainable development. SMEs can contribute by providing regular technical training to staff and training in areas related to sustainability.</p>
	<p>Goal 5 seeks to achieve equality between women and men worldwide in employment, social, political and economic terms and to eliminate gender discrimination. SMEs can develop an equality plan, increase the percentage of women in management positions and/or create work-life balance plans.</p>
	<p>Goal 6 aims to guarantee universal access to drinking water and sanitation services and to promote sustainable water management in order to improve water quality and conservation. SMEs can contribute by eliminating waste and toxic products that pollute water or by controlling water consumption and its reuse in the company.</p>
	<p>Goal 7 aims to ensure people's access to affordable energy, to increase the use of renewable energy and to promote energy efficiency. SMEs can commit to using renewable energy in their activities and promote measures to reduce energy consumption within the organisation.</p>
	<p>Goal 8 is designed to boost economic growth in a way that benefits everyone, through quality employment. SMEs can improve the working conditions of the Staff, such as salaries, holidays and working hours, or hire young unemployed people.</p>



	<p>Goal 9 seeks to promote a higher level of industrialisation through the use of technology, innovation and research. SMEs can promote digitalisation in the organisation, thinking of new services and innovative products that create new business opportunities or investing in research projects.</p>
	<p>Goal 10 seeks the social and work inclusion of the most vulnerable people in order to reduce the wealth gap between rich and poor people. SMEs can promote the inclusion of people with disabilities through accessibility in buildings or by offering them job opportunities or hiring people at risk of experiencing poverty.</p>
	<p>Goal 11 seeks to make cities and towns sustainable while reducing pollution, with affordable public transport services and green spaces. SMEs can promote sustainable mobility with electric or hybrid company vehicles and by encouraging the use of public transport among the Staff.</p>
	<p>Goal 12 aims to promote the sustainable use of natural resources, such as water, food, electricity and waste, through the reduction, recycling and reuse of these resources by companies and a responsible consumption by the population. SMEs can begin to design their sustainability strategy for the prevention, reduction, recycling and reuse of the resources they use.</p>
	<p>Objective 13 aims to curb one of the most serious problems currently facing the planet - climate change, which threatens the planet's fauna and flora and causes extreme weather phenomena such as land desertification, droughts and hurricanes with greater intensity and frequency. SMEs can calculate the carbon footprint of their organisation and start taking action to reduce their greenhouse gas emissions.</p>
	<p>Goal 15 aims to protect the environment, mainly land, forests and mountains, and to promote greater protection of flora and fauna. SMEs can implement environmental management systems in their organisation and encourage training for staff and customers on environmental issues.</p>

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	<p>Goal 16 promotes respect for human rights, the reduction of corruption in all organisations and the guarantee of peace. SMEs can create their own Code of Ethics to define the organisation's values and to prevent corruption and train staff in human rights.</p>
	<p>Goal 17 seeks to create alliances between public institutions, businesses, the civilian society and universities in order to find joint solutions to the challenges of Agenda 2030. SMEs can begin to look for key partners to create alliances that allow them to contribute to the SDGs while at the same time providing benefits in terms of business and reputation.</p>

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## PROGRESS REPORT

### Human Rights

#### Principle 1

**P1**

*Companies should support and respect the protection of internationally recognised fundamental Human Rights within their sphere of influence.*

#### Principle 2

**P2**

*Companies must ensure that their businesses are not complicit in human rights abuses.*

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

*The following SDGs related to the activity of the CTL-TH Packaging Group have been identified within the Human Rights principle.*



### POLICIES

Our policies and objectives are aligned with support and respect for the protection of internationally recognised fundamental human rights.

The organisation has created and implemented a Code of Ethics in our company. This Code of Ethics has been updated and revised in 2018, adapting it for greater participation by worker representatives.

We have an integrated internal management system that covers policies, regulations and internal procedures related to product quality, verification controls and manufacturing processes in accordance with international standards.

Our management system, in addition to including work processes and procedures related to the organisation, its people and their interrelationships, also sets the standards regarding our product and our supply chain.

There are procedures embedded in our management system which are linked to internal policies, regulations and processes concerning quality, Human Resources, the organisation, customer service and Suppliers: "P.00.00015 - Monitoring Ethical Code and Functions of the Ethical Committee and Protocol of complaints on the ethical code"

Also, with respect to the **Staff**, we keep, within the general internal management document, all the processes and procedures for personnel selection, hiring, induction, labour relations, conflict management, promotion, objective evaluation of performance, etc. in the same way as we have reflected the configuration of our internal organisation and its distribution by areas and functions.



In the CTL-TH Packaging group, we base our health and safety policy on the prevention of injuries, health monitoring and the improvement of working conditions.

We eliminate or minimise risks to the health and safety of the people and stakeholders operating on our premises.

To monitor and control our management in this area, we regularly submit to an audit of the Occupational Health and Safety Management System based on OHSAS18001, and have been certified since 2009 on a continuous basis.



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

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

In the section on **Customer** services and the processes related to the Suppliers Group, we set out the guidelines for the relationships with these stakeholders in terms of work flow, generic and personalised attention, monitoring of the service and technical assistance, resolution of incidents and measurement of their impact, etc.

As a company, our professional teams maintain a constant relationship with our clients in order to attend to their needs and problems.

We give technical assistance to help them in the interaction between the Packaging and their product.

As far as quality is concerned, we respond to their complaints and requests to deal with non-conformities in a fair manner.

In the event of in-house development, we provide technical advice in order to work together on the required solution and we also provide training sessions.

For new projects, we offer our clients the chance to assist in our factories in the production of samples or BAT to ensure a product that conforms to their plans.

The way in which the controls are integrated into our management system, including those of CSR and quality, services and operational satisfaction, etc., are included as part of the evaluation procedures for our **Suppliers**.

The fundamental tool on which our relationship with suppliers is based, from a different perspective than the transaction itself, is the Business Review, where, in addition to such transactional aspects, there is always a reminder of our policies, as well as the setting of annual improvement objectives in all the areas included. For example, the non-approval of ethical code violations (including bribes, etc.), and the assessment of compliance with environmental measures are made explicit.

We have introduced the formal purchasing policy, in accordance with the principles of CSR, to our current management system, also taking into account the control system for the designed degree of compliance.

### ASSESSMENT, MONITORING AND MEASUREMENT OF IMPACT



We can affirm that the CTL-TH Packaging group complies strictly with the legal regulations in this area, given that the companies are permanently subject to the public control of the administration, and also of the company's internal resources (HR department and representation of workers) that guarantee compliance with the aforementioned regulations, as well as compliance with the ethical standards of our clients.

In order to ensure compliance with the Code of Ethics, to resolve incidents or concerns regarding its interpretation and to adopt appropriate measures for its better implementation, a Committee for the application and monitoring of the Code of Ethics has been created. The mission of this Committee is to promote the diffusion and application of these ethical principles in all the company's activities. It shall be made up of the representatives appointed by the Directorates-General.



#### Percentage of complaints under the ethical or administrative code handled in the Group



Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
2017 Res.	None	None	None	None
2018 Res.	None	None	100%	100%
2019 Obj.	100%	100%	100%	100%

During 2018, two cases or complaints have been registered, which have been investigated in due time and form by the Commission for this purpose, for accusations of harassment, abuse or intimidation in the workplace. In addition, it should be noted that the Equality Commission has established a specific protocol for dealing with complaints of sexual harassment.



With regard to the **Staff**, as part of these transformation initiatives, in 2017 we launched a Work Survey, with the aim of measuring the commitment and involvement of people in the company, with the direct participation of a large part of the company's Staff and we have begun a process that should lead us to an assessment and action plan in 2018, described in this same report in the relevant chapters.

With regard to Health and Safety, we monitor the efficiency of our policy by means of a strategic indicator that consists of evaluating the numbers of actual or potential incidents




and the actual or potential severity that could have occurred in the company, by means of an index:



### Incident Severity Rate

Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
<b>2017</b> Res.	0.035	0.086	0.478	0.260
<b>2018</b> Res.	0.041	0.106	0.338	0.222
<b>2019</b> Obj.	0.075	0,095	0.300	0.200



### Number of hours in training or awareness-raising actions on Health and Safety matters


Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
<b>2017</b> Res.	29	407	116	552
<b>2018</b> Res.	16	600	250	866
<b>2019</b> Obj.	30	196	500	694

With regard to the **clients**, the risk of not carrying out satisfaction surveys could lead us to erroneous assessments and incorrect actions and not communicating our CSR strategy produces the risk of a bad valuation.

In the case of **suppliers**, the risk is the indirect non-compliance with Human Rights and the Principles of the United Nations Global Compact, because some of our stakeholders do not comply with them, as a consequence of our lack of verification, control and/or monitoring of some suppliers of raw materials that do not have a presence in our company. However, we must make it clear that the company carries out a check on the contractual conditions that the workers of these subcontracting companies have.


These suppliers are evaluated annually within the quality system including checks linked to the human rights detected during the audits carried out on them. This is done through audits of suppliers, to whom the ethical code of the CTL-TH Packaging group is communicated.


At the moment, our classification of suppliers is based on the annual revision of their supply of the full goods, with the agreed quality and on the agreed date. The CSR criterion has been added to the suppliers' evaluation (Business Review), pending analysis of the data.

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## ACTIONS

ACTIONS	Stakeholder
 Information on the protocol of complaint under the ethical code.	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 In-house training on the concept and scope of CSR.	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 Amendment of the code of ethics, to incorporate a policy of hiring people where the values of support for the disabled, diversity and equality are given priority.	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 Revision of workplace risk assessments to incorporate all aspects relating to the safety and health of people	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 Awareness of the ergonomic risks of the machines for the CTL-TH Engineering staff in order to provide safer machines for users.	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 Exceptional investments to adapt the machines that pose a greater risk to the health and safety of the people working on them.	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 Establishment of a new system for measuring and recording the needs of customers.	<input type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 Establishment of regular meetings with suppliers (Business Review) so that they can participate in our strategic objectives.	<input type="checkbox"/> Staff <input type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 Work survey with the direct participation of many of the people, analysis and action plan.	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 Programme to strengthen the leadership skills of company managers.	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 People empowerment programme, starting with a productive unit (injection unit).	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 Plan for the improvement of people's WELL-BEING	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 Putting the client at the centre of our organisation: <ul style="list-style-type: none"> <li>- Greater knowledge of our accounts, their business and their needs.</li> <li>- Exhaustive sales and marketing work plan to structure our approach to clients.</li> </ul>	<input type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 Use of new tools to focus on the needs and expectations of our clients. <ul style="list-style-type: none"> <li>- CRM</li> <li>- Satisfaction Survey (new policy)</li> <li>- Communication of our sustainable development strategy to involve our clients.</li> </ul>	<input type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input type="checkbox"/> Suppliers

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	<p>Knowledge of the needs of end-users in terms of their needs and expectations in packaging and especially for the tube in order to proactively provide our customers with a greater understanding of the market.</p>	<input type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input type="checkbox"/> Suppliers
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The actions carried out in the previous year are in green

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## Employment Standards

### Principle 3

P3

Companies should support freedom of unionisation and the effective recognition of the right to collective bargaining.

### Principle 4

P4

Companies should support the elimination of all forms of forced or coerced labour.

### Principle 5

P5

Companies should support the eradication of child labour.

### Principle 6


P6

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

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

The following SDGs related to the activity of the CTL-TH Packaging Group have been identified within the Work Standards principle.



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## POLICIES

In relation to the **Staff**, we have our own company agreement, which encourages relationships between the organisation and the people, which supports the freedom of unionisation and the effective recognition of the right to collective bargaining, and which includes the established working hours, schedule, workers' remuneration and social benefits

We also reflect in each work contract the agreed working hours, the remuneration according to the appropriate work category or position and the social benefits to which everyone in the company has access. We also refer to the conditions included in the general company agreement, as a reference for the Group Staff.



We hold regular monthly meetings with the Works Council, as well as whenever circumstances recommend consulting the Staff interest group beyond the minimum legal requirements.


- Meetings with the Works Council. Meeting minutes and memoranda with the agreements made.
- Annual meetings of the management with the Staff for information and communication of the main items related to the company's progress.
- Meetings with people in charge. Monitoring and evaluation reports.
- Collective communication systems: bulletin boards, corporate email, intranet, etc.
- Formally incorporate the CSR policy into the management systems and internal communication protocols in order to encourage support from the Staff stakeholder group, in collaboration with the Company.

The covenant or agreement of working conditions of CTL-TH Packaging S.L.U, is reached and agreed with the works council. The Works Council verifies, together with HR, that the aforementioned company agreement is complied with at all times, together with the CSR conditions related to the principles and, in the event of any incidents, an internal notification is made, which is recorded in the form of Minutes (content of the incident, solution, responsible parties, etc.).

The minutes of the meeting and all the resolutions passed by common agreement with the Works Council are recorded in an internal database and are also communicated globally to the entire Staff, becoming part of the internal rules of the Company.

In the same way, several direct communication channels are maintained with the people, made known to all staff who become part of the organisation during their induction: direct meetings with the person in charge and with the works committee, internal e-mail, memos, collective meetings with management and workers' assemblies. We do not restrict the meeting time to the legal minimums established in relation to collective bargaining, but instead we invest the time necessary to properly manage each circumstance..

Contracts with the company, both national and international, are governed by the regulations in force in the European Union on the minimum age for access to the labour market, i.e. 18 years. We do not include the possibility of entering into employment

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contracts with persons over 16 years of age with the authorisation of their legal representative.

We promote a policy aimed at maintaining a stable Staff in which currently less than 2% of the people in the organisation are under temporary employment conditions.

We have a general and formal policy on work-life balance for people, subject to their identification and registration.



As a matter of policy, we encourage in-house work and avoid subcontracting work to outside companies that competitors often outsource.

It also allows us to maintain a high level of knowledge and education, not only in our company but also in society and the surroundings where our various companies are located.

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

We will ultimately disseminate this written policy to all company personnel, through the usual internal media, as well as to other stakeholders.



The CTL-TH Packaging Group has developed a series of social benefits specifically aimed at the **"Staff"**, stakeholder group, improving their quality of life, as well as the perception that this stakeholder has of the organisation:

P3	P4	P6
Communication sessions	Scholarships for the training of workers' children	Prioritising internal promotion
Organisation of information meetings for all staff regarding diet and sleep	Adapted timetable for pregnant women who work in 3 shifts.	Work with mentally handicapped people to assist in their integration into the job market.
Family visits to the Company	Installation of a room to encourage rest	School visits to see the company
Drawing competition for employees' children at Christmas	Supplement for sick leave	Collaboration with training centres for student placements in the company
Blood donation campaign on the company's premises during working time.	Days of absence for hospitalised children, parents and spouses	Work-linked training programme between a company and a vocational training centre to reintegrate young people into the world of work.
	Flexible working hours that allow family-life balance	
	San Prudencio Workers Foundation with various support services	
	Subsidised cafeteria	
	Subsidised transport	
	Relief contract	
	Pension plan	
	Health insurance	
	Life insurance	
	Wages above industry average	

In relation to **suppliers**, in our regulations and through our code of ethics, we emphasise non-approval based on the principles P4 (*to support the elimination of all forms of forced or compulsory labour*), P5 (*to support the elimination of child labour*) and P6 (*to support the abolition of discriminatory practices in employment and occupation*).

### ASSESSMENT / MONITORING AND MEASUREMENT OF IMPACT

In relation to the **Staff**, we have a formal procedure for managing performance and evaluation of people based on their skills, potential and / or professional and personal projection, which should respond to the expectations of professional growth of individuals, as well as covering the future needs of the organisation of the company.

We have no risk of employing minors under legal age. For each appointment, we verify the identification of the person and carry out an initial medical examination to ensure that all the company's national and international personnel have reached the age of 18 at the time of entering into the employment relationship.



We consider that discrimination based on gender is a risk in the CTL-TH Packaging Group, which is why we are currently working on an analysis that has resulted in an equality plan for the years 2018-2021.

In future selection processes, we must include the criteria defined in the CSR policy drafted beforehand, in which we will include criteria of gender equality and respect for diversity, as well as procedures for verifying compliance with these policies and

managing incidents.

To this end, a series of indicators has been established to verify the progress of the equality plan in the areas for improvement identified.



**Number of women and men laid-off and percentage of retention of their usual job, provided there is sufficient workload.**

P6

Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
<b>2018</b> Res.	Assessment	Assessment	Assessment	Assessment
<b>2019</b> Obj.	Development	Development	Development	Development
<b>2020</b> Obj.	To be defined	To be defined	To be defined	To be defined
<b>2021</b> Obj.	100%	100%	100%	100%



**Number of women and men who receive a personalised career plan after returning from a lay-off period and/or leave of absence**

P6

Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
<b>2018</b> Res.	Assessment	Assessment	Assessment	Assessment
<b>2019</b> Obj.	Development	Development	Development	Development



<b>2020</b> Obj.	To be defined	To be defined	To be defined	To be defined
<b>2021</b> Obj.	100%	100%	100%	100%




Number of women who have reached Managerial positions, as a result of promotion and/or creation of new positions

P6

Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
<b>2018</b> Res.	Assessment	Assessment	Assessment	Assessment
<b>2019</b> Obj.	Development	Development	Development	Development
<b>2020</b> Obj.	To be defined	To be defined	To be defined	To be defined
<b>2021</b> Obj.	50%	50%	50%	50%

Degree of Staff satisfaction with the implementation of the Equality Plan (survey)

P6

Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
<b>2018</b> Res.	Assessment	Assessment	Assessment	Assessment
<b>2019</b> Res.	Development	Development	Development	Development
<b>2020</b> Obj.	To be defined	To be defined	To be defined	To be defined
<b>2021</b> Obj.	7/10	7/10	7/10	7/10



In terms of communication, on an annual basis, the company's accounts are provided to the workers' representatives with a detailed explanation and answering any questions that may be asked.

These accounts are made public and are registered in the Commercial forum.


In addition, a detailed report on the evolution of the company, commercial and customer matters, recruitment of personnel and provisional accounts for each quarter is also provided on a quarterly basis.

In terms of communication, as a result of the 2017 Staff survey, and with the support of a recently created communication committee, a significant risk was identified for achieving the objectives of the strategic plan. There is a lack of transparent and continuous communication with people to ensure the return of their opinion to the management, in order to encourage constructive exchange.

As regards **Suppliers** and **Clients**, we have yet to verify whether these Stakeholders are complying correctly with these principles and in particular whether they support the elimination of all forms of forced or compulsory labour.

Although we have circulated information to our supply chain about good working conditions and the absence of forced labour through our code of ethics, we do not have a system for verifying correct compliance.


For the **suppliers who** work on our premises, the system monitors compliance with this principle. Audits are carried out to check suppliers' compliance with this principle.

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## ACTIONS

ACTIONS	Stakeholder
 <span style="color: green;">Performance of a gender equality assessment in order to establish an action plan</span>	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 <span style="color: green;">Constitution of a working committee to develop the gender equality plan.</span>	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 <p>Define the actions resulting from the Equality Plan. As noteworthy actions</p> <ul style="list-style-type: none"> <li>- improve the level of professional training of women in manufacturing processes</li> <li>- Improve working hours and work systems in order to reconcile family needs with professional obligations.</li> <li>- awareness-raising in the field of gender equality among decision-makers and workers in general.</li> </ul>	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 <p>Develop new lines of communication and information with people, including their feedback to management. Communication Plan focused on a transparent exchange of information and communication between individuals and management.</p>	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 <span style="color: green;">Inclusion of the social part in the Ethics Committee</span>	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 <span style="color: green;">Communication and internal promotion of our values</span>	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 <p>Moderately and realistically increase our level of implementation of CSR policies.</p>	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 <p>Update of the sexual harassment protocol in the company</p>	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 <p>Know the expectations of 2/3 of the most sensitive customers in this field of CSR, to see how to respond to the challenge of being a more recognised supplier in this area.</p>	<input type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 <span style="color: green;">Inform our supply chain about our Code of Ethics.</span>	<input type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 <span style="color: green;">Adapt the induction plan to emphasise the Group's protection of the principles</span>	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers

The actions carried out in the previous year are in green

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## Environment

### Principle 7

**P7**

*Companies should maintain a precautionary approach that is environmentally friendly.*

### Principle 8

**P8**

*Companies should encourage initiatives that promote greater environmental responsibility.*

### Principle 9


**P9**

*Companies should encourage the development and diffusion of environmentally friendly technologies.*

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

*The following SDGs related to the activity of the CTL-TH Packaging Group have been identified within the Environmental principle.*



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## POLICIES

The CTL-TH Packaging Group is committed to protecting the environment, reducing environmental impacts and working together with customers, suppliers and stakeholders.

Our management system is ISO 14001 certified in the group companies and, as certified companies, all our internal policies and procedures are geared towards environmental protection throughout the production, supply and waste management chain.

Within our environmental management system which consists of a general procedure, various processes, registers and monitoring documentation, we include the following aspects of environmental monitoring: Natural Resources Management, Contract-Subcontract Control, Waste Management, Hazardous Waste Management, Environmental Communication, Environmental Aspects Evaluation Identification, Legal Requirements Evaluation Identification and Environmental Emergency and response ability.


Our environmental strategy and policy have been formulated on the basis of an exhaustive analysis of our Stakeholders. As a result of this analysis, and in order to comply with our Environmental Policy, 5 key work priorities have been defined.

<b>Legislation</b>	Monitor, Evaluate, Apply and Comply
<b>Suppliers</b>	Commit, Sustainable, Evaluate
<b>Staff</b>	Train, Evaluate, Raise Awareness
<b>Production processes</b>	Reduce emissions, Use natural resources in a sustainable way, Minimise, Recover and Recycle waste
<b>Design</b>	Develop raw materials, products and processes, taking the Life Cycle into account.

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



Aspects	Actions	Benefits
<b>VOCs (Volatile Organic Compounds)</b>	Replace catalytic varnishes with UV (2008) Replacement of acetones for cleaning inks (2010)	↓ 56% VOC
<b>Electricity Consumption</b>	Replacement of thermal ovens with UV ovens for drying inks and varnishes (2010) Eco-design of moulds for "light" caps (2009)	↓ 2M kW/year
<b>Material Consumption</b>	Eco-design Light Caps (2009) Low profile Tube (2018)	↓ 540 T RM ↓ 100 T Lost ↓ 40% Used oil Per year and only Light Caps Ø50
<b>CO<sub>2</sub></b>	Manufacturing in plants close to the client	↓ 3% CO <sub>2</sub> For French clients, if manufacturing in France vs Manufacturing in Spain
	Sleeve replacement in PET with integrated protection systems ("SafeTop" caps - 2015)	↓ 8% CO <sub>2</sub> Vs Cap with sleeve.
	Use of HDPE-PCR Recycled Material (2015)	↓ 9% CO <sub>2</sub> Vs Tube with virgin HDPE
	Use of Green Raw Material based on sugar cane (2015)	↓ 5% CO <sub>2</sub> Vs Tube with virgin HDPE
<b>End of Life</b>	Innovation 100% recyclable polypropylene tube (2010). To integrate the circular economy	↓ 39% impact CO <sub>2</sub> vs PE Tube with PP Cap for potential end-of-life CO <sub>2</sub> impact

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## ASSESSMENT / MONITORING AND MEASUREMENT OF IMPACT



The CTL-TH Packaging Group monitors its main consumptions to determine which of them have a significant impact on the environment.



The environmental aspects that are taken into account and for which monitoring and measurements are made within the group are the following.

<b>Non-Hazardous Waste</b>	Paper, Cardboard, Wood, Batteries, Rubbish...
<b>Hazardous Waste</b>	Batteries, Aerosols, Electronics, Absorbent materials, Cleaning products, solvents, slurry...
<b>Material Consumption</b>	Varnishes, PP, PE, Laminates, Caps, Sleeves...
<b>Energy Consumption</b>	Water, Electricity, Propane, Butane, Gas, Diesel Oil
<b>Transport</b>	Professionals, expeditions, receptions
<b>Noise</b>	
<b>Soil</b>	Contamination
<b>Discharges into water</b>	Sanitary / rainfall water
<b>Atmospheric Emissions</b>	CO, NOX, SO2, COT...
<b>Incidents / Emergencies</b>	Fires, Explosions, Legionnaires disease, Gases...

## Examples of consumption



### Electricity in Kw/h

Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
2017 Res.	Including TH	7,438,154	10,312,483	17,750,637
2018 Res.	Including TH	7,500,619	10,241,978	17,742,597
2019 Obj.	Including TH	Not significant	Not significant	NA



### Natural Gas in Kw/h

Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
2017 Res.	Including TH	0	1,208,932	1,208,932
2018 Res.	Including TH	0	1,353,914	1,353,914
2019 Obj.	Including TH	0	Not significant	NA



### Water in m3

Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
2017 Res.	Including TH	2,870	9,187	12,057
2018 Res.	Including TH	1,924	6,877	8,801
2019 Obj.	Including TH	Not significant	Not significant	NA



### Paper (Kg).

Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
2017 Res.	Including TH	1,208	147,105	¿?
2018 Res.	Including TH	1,312	124,799	¿?
2019 Obj.	Including TH	Not significant	Not significant	NA



Due to the diversity of its environmental impact, each company manages its objectives and indicators according to the environmental impact assessment procedure. The most important impacts are those dealt with in the objectives and indicators shown below.

**P7**

## Significant Environmental Aspect Objectives 2018

### Tuboplast & CTL-TH Engineering

Type	Appearance	Objective
Consumption of packaging	Plastic Box/Lid	No defined actions
Hazardous waste	Varnish	2% reduction in weighted aspect
Energy consumption	Electrical	Study of voltaic energy options
Hazardous waste	Aqueous cleaning liquids	2% reduction in weighted aspect
Non-Hazardous Waste	PP	2% reduction in weighted aspect
RM Consumption	PP in reel	Loss reduction

### CTL Packaging

Type	Appearance	Objective
Non-Hazardous Waste	PE (Kg purge)	Increase <10 % (with respect to the number of EA tubes). Reduce losses
Energy consumption	Electric mix	Detailed review of consumption in order to define RM
and Plastic Consumption plan	PEBD	Increase <10 % (with respect to the number of EA tubes). Reduce losses
Non-Hazardous Waste	PE (Kg)	Increase <10 % (with respect to the number of EA tubes). Reduce losses



Since 2017, as a result of its environmental policy to reduce the environmental impacts of its activity, the CTL-TH Packaging group has defined an objective to reduce CO<sub>2</sub> emissions by measuring CO<sub>2</sub>Eq emissions.



## Impact on Global Warming - Carbon Footprint

T EqCO <sub>2</sub>	Group		Tuboplast		CTL Packaging	
	2017	2018	2017	2018	2017	2018
Scope 1	285	345	274	332	11	12
Scope 2	312	315	0	0	312	315
Scope 3	12,200	12,910	8,324	9,549	3,846	3,647
<b>Total</b>	<b>17,798</b>	<b>13,570</b>	<b>8,598</b>	<b>9,881</b>	<b>4,170</b>	<b>3,975</b>

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

<b>Scope 1</b>	Fossil fuels Emissions of fluorinated gases
<b>Scope 2</b>	Electricity consumption - Electrical Mix
<b>Scope 3</b>	Items such as packaging, raw materials, procured items Waste Reception and dispatch transport Professional and personal travel Office and water consumption.



In relation to the **Staff**, in accordance with our policy, we periodically carry out training, evaluations and awareness-raising to adapt our internal activities to the environmental regulations and to reduce the impact of our activity, in addition to the initial training that all new recruits receive at the beginning of their employment relationship through the Induction Plan.

Specifically, we increase everyone's awareness by means of our permanent recycling and waste separation programmes in all areas of the company and we focus on containing consumption not only as an economic saving measure but also as a collective contribution to protecting the environment.


To this end, we use specific signs, receptacles and containers suitable for this purpose and an isolated room identified for use as a container for waste that is hazardous to individuals and/or the environment.

 **Number of hours in training or awareness-raising actions on environmental issues**

Year	CTL-TH Engineering	CTL Packaging	Tuboplast	Total
2017 Res.	29	200	3.5	101
2018 Res.	¿?	0	7	¿?
2019 Obj.		0	200	

With regard to **clients**, a prototype has been developed to measure the carbon footprint of manufactured products.

In the future, using this tool, the CTL-TH Packaging Group will be able to advise our clients on packaging solutions so that clients can make objective decisions about the most sustainable products they want to develop.

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### Development of Sustainable Packaging Solutions



CTL-TH Packaging has developed innovative and global packaging solutions that create identity and distinction for its **clients**, consumers and for society.

Its current product range offers an extended range of options that allow clients to have a more environmentally friendly product at their disposal.

### ESTube tube (Easy Supply Tube)

The ESTube offers considerable advantages in terms of environmental improvements.



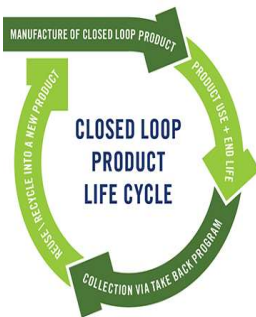
ESTube is a 100% polypropylene packaging solution, a technology that pre-empt's recycling trends and has the following advantages



<b>100% mono material (PP)</b>	It does not disturb the recycling chain with other plastic mixtures (PE, PVC caps, etc.).
<b>No adhesive</b>	Recycled plastic is not contaminated and generates additional value.
<b>Polypropylene</b>	Optimal recovery of the raw material within the circular economy compared to PE.
<b>Short series</b>	Adjusted to current market needs without generating more waste and losses.
<b>Quantity adjusted to needs</b>	Reduction in transport, stock and obsolescence that generates subsequent waste.
<b>Easy to fill</b>	Lower weld temperatures

### Tubes with PCR (Post Consumer Recycled) Plastic

Optimisation of the use of raw materials such as PE and PP in packaging should be accompanied by the introduction of post-consumer recycled (PCR) and/or post-industrial recycled (PIR) materials. In the case of the CTL-TH Packaging Group, we set targets for incorporating these recycled materials into our ranges of tubes and caps to help our customers achieve their sustainability goals.



<b>Use of PCR in</b> <ul style="list-style-type: none"> <li>- Caps</li> <li>- Heads</li> <li>- Skirt</li> </ul>	Participation in the circular economy
	Collaborates with regulatory targets on % of packaging waste to be recycled: <ul style="list-style-type: none"> <li>- in 2025 &gt; 50 %</li> <li>- in 2030 &gt; 55%</li> </ul>

### Green PE Plastic Tubes

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


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












<b>Use of Green PE</b>	Vegetable Origin (Sugar cane) instead of fossil.
	Lower Carbon Footprint Impact

In relation to our **suppliers**, in the development of new materials, we insist that they comply with the regulations in force, both of an environmental nature as well as with the ethical principles of our organisation.


In this approval process, we take into account, as a selection criterion, the environmental criteria that we have identified in the evaluation based on the environmental aspects defined above (Waste generated, Material and Energy Consumption, Transport, Noise, Soil, Water Discharges, Atmospheric Emissions, etc.).

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## ACTIONS


ACTIONS	Stakeholder
 <span style="color: green;">Produce a prototype tool for measuring the carbon footprint of manufactured products.</span>	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 <span style="color: green;">Define a carbon footprint measurement tool for company activities.</span>	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 Create a communication pack aimed at understanding, internally and externally, the actions carried out in terms of sustainability in the CTL-TH Packaging group.	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 <b>Strategic objective 2020</b> Offer Packaging solutions to our clients to support them in achieving the recycling of 50% of packaging materials. To this end we develop tubes that contain 50% PCR across the full range of products in our catalogue.	<input type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 <b>Strategic objective 2020</b> Innovation in the development of internal recycling systems for the plastic waste generated in the manufacture of ESTube tubes for 2020 (Post Industrial Recycle)	<input type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 <b>Strategic objective 2020</b> Offer our customers a catalogue with options of 100% recyclable products.	<input type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input type="checkbox"/> Suppliers
 <b>Strategic objective 2025</b> Implementation of systematic Eco-design in each development.	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 <b>Strategic objective 2025</b> Implementation of the Product Life Cycle Analysis tool.	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
 <b>Strategic objective 2025</b> Ensure that all products in our catalogue are 100% recyclable.	<input type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input type="checkbox"/> Suppliers

The actions carried out in the previous year are in green

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With respect to the improvement in the environmental impact established for the measurement of the Carbon Footprint of the activity, the most relevant aspects and corresponding work areas have been determined.

TOP5 – By Company	Group	TH	CTL
Transport	Study 	Study 	Study 
Transport	Study 	Study 	Study 
PEHD	↑ Material Less Impact ↓ Material More Impact 	Losses ↓ 	Losses ↓ 
PEBD	↑ Material Less Impact ↓ Material More Impact 	Losses ↓ 	Losses ↓ 
Laminated compound (aluminium)	↑ Material Less Impact ↓ Material More Impact 	Losses ↓ 	Losses ↓ 
Private commuting to work	NA	Mobility Plan 	NA
Electric mix	NA	NA	Presenting options - Green Energy - Consumption 

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## Anti-corruption

### Principle 10



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

### Sustainable Development Goals 10, 16

*The following SDGs related to the activity of the CTL-TH Packaging Group have been identified within the Anti-corruption principle.*



## POLICIES

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


Dissemination of our formal CSR policy which includes our practices in the fight against corruption and verification of their dissemination to all stakeholders, through the usual means of corporate communication.

As indicated above, we have drawn up a code of conduct regarding extortion, bribery or any other type of corrupt conduct, which we have disseminated to our Stakeholders: **Staff**, and **clients** when so required, and all our **suppliers**.

We strictly comply with the laws in force, with respect to the national and international regulations of the countries in which we operate, with respect to the control and abolition of any form of corruption that may occur, including extortion and bribery.

In relation to **suppliers**, all contact with them includes a reminder of our policies, and annual improvement objectives are deployed in areas such as the rejection of violations of ethical codes (including bribes, etc.).

## ASSESSMENT / MONITORING AND MEASUREMENT OF IMPACT

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We have carried out an analysis to identify the internal areas and activities with the greatest risk of corruption, leading to the conclusion that they are located in the supply chain of Suppliers, due to the markets with which we operate and their own idiosyncrasies.


There is no procedure for assessing the degree of awareness of our codes of conduct and policies against corruption and bribery by our stakeholders.

In order to ensure compliance with the Code of Ethics, to resolve incidents or concerns regarding its interpretation and to adopt appropriate measures for its better implementation, a Committee for the application and monitoring of the Code of Ethics has been created, as well as a specific and confidential procedure for reporting situations relating to corruption. The mission of this Committee is to promote the diffusion and application of these ethical principles in all the company's activities. The Committee shall be formed by the General Management, HR Divisions and the IMS of each Group company, as well as representatives of the Staff.

### ACTIONS

ACTIONS	Stakeholder
Dissemination of the Code of Ethics.	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
Establishment of management mechanisms based on the allegations that can be made regarding all our stakeholders.	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Clients <input checked="" type="checkbox"/> Suppliers
Periodically communicate the existing mechanism for monitoring the CSR policy, geared towards promoting the reporting, management and redirecting of possible incidents that may occur in relations to our stakeholders.	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Clients <input type="checkbox"/> Suppliers

The actions carried out in the previous year are in green

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## Final Commitment

Through this Progress Report, the CTL-TH Packaging Group expresses its desire and interest to continue working and promoting Corporate Social Responsibility policies and actions, collaborating with our Stakeholders to understand and move forward in the new areas of activity opened up by the new Sustainable Development Objectives.