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Mr. António Guterres
Secretary-General
United Nations
New York, NY 10017
USA

24 July 2021

Dear Mr. Secretary-General,

I am pleased to confirm that Mondi reaffirms its support of the United Nations Global Compact's Ten Principles in the areas of human rights, labour, environment and anti-corruption.

In this annual Communication on Progress report (Mondi Sustainable Development report 2020), we describe our efforts and actions to implement and monitor progress against its principles into our business strategy, culture and day-to-day operations and have made a clear statement of this commitment to our stakeholders and the general public. The report also provides our water performance in accordance with the six elements of the UNGC CEO Water Mandate.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew King', with a large, sweeping flourish at the end.

Andrew King
Chief Executive Officer



Together we
make Mondri...
SUSTAINABLE
by DESIGN



Mondi Group
Sustainable Development report 2020

What's inside

Together we are...

a diverse team of professional, passionate people who excel at many different things. But whatever we bring to Mondi, a global packaging and paper company, we have one shared purpose: to contribute to a better world by making packaging and paper Sustainable by Design. This inspires us to deliver positive change through what we do and how we do it. The past year has seen us pulling together more than ever – finding new ways of connecting and staying agile to overcome the impacts of COVID-19 and doing everything in our power to help our people and communities stay healthy. As this year's report shows, our strong performance underlines our resilience both as a business and as a team – we are stronger together.



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Our approach to reporting

OUR SUSTAINABILITY REPORTING

This report provides a comprehensive overview of our approach to sustainable development and our performance across our 10 Growing Responsibly Action Areas. As we end the final year of our Growing Responsibly model (GRM) and close out our 2020 commitments, we have reflected on our cumulative impact over the last five years, as well as our 2020 performance. We also share a first look at our new sustainability commitments for 2030. ERM CVS has provided assurance on selected information and key performance indicators and confirmed the report is in accordance with the Global Reporting Initiative (GRI) Standards: Core option and the Sustainability Accounting Standards Board (SASB) Sustainability Accounting Standard for the Containers and Packaging Industry.

To improve the accessibility and transparency of our reporting, we have included a full glossary on [page 110](#) and a list of endnotes can be found at the end of the report on [page 114](#).

Alongside this report, our suite of other reporting documents is intended to meet the interests and reporting requirements of a range of different stakeholders.

Navigating our 2020 sustainability reporting

GRI & SASB Index

The report has been produced in accordance with the GRI Standards: Core option and the SASB – Containers & Packaging Industry Standard. To locate the disclosures and standards within the guidelines and our response, please see this separate index.



Click to Download

Integrated report

In our 2020 Integrated report, you can find a balanced overview of Mondi's 2020 performance, including financial results and progress against our strategic objectives. It also includes an overview of our TCFD disclosures.



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Sustainable Development Goals (SDGs) Index

Our strategic approach to the SDGs is included in the body of this report. In addition, a separate detailed index is available, which maps the SDGs and their respective targets against the contents of this report, including references to where supporting information about our contributions to each target can be found.



Click to Download

Stakeholder Engagement Index

This index provides detailed information about our stakeholder engagement, including why we engage different groups, how we engage with them, what topics we engage on and what action we have taken as a result.



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External recognition

Our sustainability performance has been disclosed in or received recognition by a number of external corporate ratings and indices, including:



CDP

'Triple A' score for climate change, water security and forests



MSCI

ESG Rating AAA



ISS ESG

Prime status in the ISS ESG Corporate Rating



Sustainalytics

Ranked #1 in the Paper & Forestry industry October 2020



Ethibel Sustainability Index (ESI)

Constituent of the ESI Excellence Europe



Euronext Vigeo Eiris Indices

UK 20
Europe 120



EcoVadis

Platinum recognition level
Top 1% of all companies

Transition Pathway Initiative

Management Quality: Level 4* rating, top score out of 18 companies in paper sector
Carbon Performance: aligned with 'Paris Pledges'

FTSE/JSE Responsible Investment Index

Constituent of the FTSE/JSE Responsible Investment Top 30 Index



FTSE4Good
Member of the FTSE4Good Index Series

2020 Highlights



Keeping our people safe

1 million masks
supplied to employees
worldwide

23%
reduction in total recordable
case rate since 2015

24-hour safety mindset

focused on the social
psychology of safety at work
and at home

21,000 employees
in 14 countries can now
use the Employee
Assistance Programme
for counselling

Tackling climate change

Science-based targets

Made progress on science-
based targets covering 95% of
our Scope 1 and 2 emissions

23.6%
reduction in our mills' total
specific CO₂e emissions
against the 2014 baseline



67%
mills' fuel consumption
from renewable biomass-
based sources

104%
electricity self-sufficiency
in our mills



Supporting local communities

€11.5m
invested in community
initiatives in 2020

100,000
medical grade face masks
donated to protect frontline
healthcare workers in South
Africa from COVID-19

€3.3m
donated to clinics, hospitals
and governments for
COVID-19 relief efforts

Setting 2030 sustainability commitments



Taking strides towards greater diversity and inclusion

29%
women across our
Executive Committee
and its direct reports

25%
women on our Board

Diversity & Inclusion Policy
updated and published

Developing sustainable solutions



76%
of our revenue is from
products that are reusable,
recyclable or compostable,
supported by our
EcoSolutions approach

8 WorldStar awards for
our product innovations



Committed to transparency

One of 10 companies
globally with a CDP 'Triple A'
score on climate change,
forests and water security



2020 performance
against a 2015 baseline

18.4%
reduction of specific
COD emissions

1.6%
reduction of specific
water consumption

25.4%
reduction of specific
waste to landfill

13.7%
reduction of specific
NOx emissions



Sourcing our fibre sustainably

100%
of our mills maintained Chain-
of-Custody certifications

76%
of our sourced wood was
FSC™- or PEFC™-certified

94%
of our sourced pulp was
FSC- or PEFC-certified



Responding to COVID-19



Together we are...
reflecting on and
learning from COVID-19

2020 was the year COVID-19 changed the world as we know it. The impacts were felt by individuals, communities, businesses and economies around the world.

At Mondi, we share in the collective sorrow for all those affected. This motivates us to move forward with renewed determination to challenge the status quo and build a more sustainable future together.

Supporting our people

When the COVID-19 pandemic first emerged, our priority was the health and safety of our employees and their families. We acted quickly and decisively as a Group to ensure we could continue to work safely under changing local conditions and protocols.

A central response team was set up to coordinate global efforts and supply over one million masks and other personal protective equipment (PPE) to operations worldwide. We defined best practice measures and communicated what needed to be put in place across sites so that people could safely continue their work.

This was essential to allow us to continue to make products that are indispensable to everyday life, including materials for personal hygiene products and packaging for food, consumer goods and online deliveries. We also have a responsibility to those communities where our mills contribute to providing essential services such as energy, heat and wastewater treatment.

We focused on empowering local management to take decisions appropriate to local circumstances and to secure jobs and livelihoods of our employees. We had no permanent closures at any of our operations as a result of the pandemic. We actively supported people to adapt to new ways of working and balancing the pressures of work and home life. This was an unsettling time and we took steps to look after the wellbeing of our people. Our leadership communicated personal messages, business teams shared stories of success and the Employee Assistance Programme was promoted across the business. There were messages of hope, resilience and togetherness – with the theme of **#StrongerTogether** featuring in our internal communications.

We also ensured full salary payments for all employees on sick leave after contracting COVID-19. During the year, a total of 2,321 of our employees tested positive for COVID-19 and 8 sadly died with the disease. We recognise the pain and loss experienced by our people and their families and we have given our support to those affected.

[Find out how we supplied 1 million masks to our frontline employees page 69](#)

[Read about how we increased our focus on mental health page 29](#)

“It’s times like these that reinforce the importance of teamwork. I think we’ve shown tremendous agility, despite the challenges, and that’s testament to the efforts of everyone at Mondi. I can only emphasise my deepest gratitude to all those who have enabled us to keep serving our customers and communities.”

Andrew King
CEO Mondi Group



Responding to COVID-19

We are particularly grateful to the employees who kept our mills and plants running. Many made personal sacrifices including taking on longer shifts – a situation we have kept under close review and will adjust to normal as soon as it is practically possible. We even had teams volunteering to sleep in our mills so that we could continue producing our products and supplying electricity and wastewater treatment for local communities. We adapted team rotation and shift models, introducing flexible shift times, providing nutritious meals and ensuring access to testing.

For the many employees working remotely, we invested in digital infrastructure and equipment so that teams could continue to interact. Video check-ins became the norm, with many teams connecting more often than before. A taskforce is developing a sustainable framework for flexible working at Mondi in future.

While we have operated under exceptional conditions due to the pandemic, with travel and site-based monitoring and auditing not being feasible in 2020, environmental compliance requirements have continued to be met.

Adapting our operations

At times like these, flexibility in production is crucial to meet global market demand for packaging. Our resilient business model demonstrated its true value. With the situation changing daily, local operations were empowered to take decisive action and make decisions in an agile way. This enabled continued delivery of essential products to our customers while following the rules and guidelines established by local administrations.

In some cases, we were required to temporarily stop production – such as in South Africa where regulatory requirements saw our Merebank mill close down for five weeks.



Many of our operations stepped up to support the local response to the health crisis. Two new production lines were built at Mondi Gronau (Germany) to produce much-needed melt-blown fabric and surgical face masks. Together, they are capable of producing more than one million face masks a day and the fabric is also sold to other face mask manufacturers.

At Mondi Korneuburg (Austria), we developed packaging for QIAGEN's SARS-CoV-2 coronavirus test kits. The team worked closely with QIAGEN to understand how best to ensure test kits were packaged safely with the necessary protection to ensure they were not compromised before use.

 [Discover how our people pulled together to keep our mills running page 32](#)

Keeping supplies flowing

Ensuring business continuity for our customers, many of whom supply products that are essential to everyday life and public health, is a crucial responsibility. As the situation unfolded, securing the raw materials needed to keep serving our customers was a top priority.

There was a period early on when logistics – both inbound and outbound – were extremely difficult. Transport delays, evolving export restrictions and changes to laws and regulations created challenges for our procurement teams. Our global procurement network mobilised in response and reached new levels of collaboration.

One challenge was the increase in market demand for films, resins and solvents, which are used in PPE and hygiene components, as well as our packaging.

Our procurement teams around the world worked together, shifting materials between operations to keep supplies flowing and production running.

 [Read more about how our procurement teams adapted to keep our supply chain flowing page 68](#)

Assisting local communities

The pandemic increased hygiene and safety concerns and exacerbated social challenges, such as poverty and food security. Our operations focused their social investments on local needs.

€3.3 million
in once-off donations to clinics,
hospitals and governments for
COVID-19 relief efforts

Many targeted funds and in-kind donations to help tackle the local response with thousands of masks, PPE, medical and surgical raw materials donated to municipalities, health facilities and local organisations.

Financial support in the amount of €3.3 million was provided to clinics, hospitals and governments in Poland, Slovakia and Russia. We also supported local health infrastructure, such as our mobile clinics in South Africa and Mondi Syktyvkar's healthcare centre.

We also provided community relief by supporting disrupted services. For example, Mondi South Africa supported the supply of fresh water to remote communities and donated food parcels to over 2,250 vulnerable families. We continued to provide essential services for local communities – such as energy, heat and wastewater treatment – at a number of our operations.

 [Read more about how our local operations mobilised to support their communities page 74](#)

 [Discover our new global partnership with the United Nations World Food Programme to help address hunger and prevent food waste page 75](#)

Sustaining momentum out of a crisis

The COVID-19 crisis has driven transformation and increased the pace of social change. It has impacted our behaviour and made us all more aware of how connected we are – with each other and with nature.

We have an opportunity to build on this momentum and look at how we operate as a society and as businesses.

At Mondi, as we continue to adapt and innovate, we will challenge ourselves to find new ways to support our customers and drive lasting, positive change for society.

Leadership insights on sustainability

In conversation with:

Dominique Reiniche, Chair of Mondi's Sustainable Development Committee and
Andrew King, CEO Mondi Group



Dominique Reiniche

Andrew King

Together we are...
moving ahead with
renewed ambition
for the future

Andrew, let's begin with how your employees have responded during an extremely difficult year. Is there a message you would like to share with them?

AK: Yes, I would like to start by thanking all those who work at Mondi for their outstanding efforts in response to the challenges, both at work and at home. My thoughts and sympathy are with all those who have been personally affected. While it's been difficult for so many, our resilient business model has proven itself during the pandemic and our employees have made a huge contribution. There are many inspiring examples of people making personal sacrifices and going the extra mile across all our operations. Together, we have shown that Mondi is made of a team that cares deeply about each other, our customers and communities. The year has also served as a reminder of how important our products are to society, and I feel inspired by the resilience our business and our people have shown.

Dominique, what do you think COVID-19 has taught us about addressing sustainability issues as a society?

DR: I think COVID-19 has in fact increased the pressure on existing issues and accelerated the sustainability agenda. It has changed the way we think about things like digitalisation and flexible working and it has moved crucial issues like food security, environmental quality and access to healthcare under the spotlight. These things impact all of us as members of a global society, but we know this virus has not affected everybody equally.

The pandemic has shown just how connected we all are and why it's important that we work together, upstream and downstream, to keep materials and goods flowing.

This is a strength of Mondi's, because of our integrated business model that places great importance on collaboration across the value chain. But amid the current crisis, we must not lose sight of the longer-term issues such as climate change and the importance of innovating for a circular economy. The Board has been greatly encouraged by Mondi's response and resilience.

What has the impact of the pandemic highlighted specifically about Mondi's business and the wider industry?

AK: Certainly one thing we've been reminded of is how vital our products are to our customers who deliver essential food, health and hygiene products to society. Keeping their businesses running has been about more than just making packaging. It's been about ensuring essential products reach the people who need them. From an operational standpoint, one of the things our customers have recognised is the importance of secure supply chains. We've been fortunate in that we have had the capacity and flexibility to be able to supply customers throughout the height of the pandemic. This continuity has also been crucial for the communities around our mills, some of whom we supply with critical services such as energy and wastewater treatment. We've continued delivering those services and supported the frontline pandemic response. This has galvanised relationships and shown the importance of being directly engaged in local communities.

Leadership insights on sustainability

“We need to stand in the shoes of our consumers – we must build common standards, such as for product recycling and labelling, to make it easier for us all to be a part of the solution.”

Dominique Reiniche
Chair of Mondi's Sustainable
Development Committee

Turning our attention to the five years of the Growing Responsibly model, what do you see as Mondi's greatest achievements?

DR: I think we have really matured in the five years of the Growing Responsibly model (GRM) and it has been pivotal in growing the businesses sustainably. Our purpose is to be Sustainable by Design and the GRM has been a great learning tool on this journey – both for the business and the Sustainable Development Committee that I have the honour to chair. This is evidenced by Mondi's multiple successes in external benchmarks; we achieved an outstanding CDP 'Triple A' score in 2020 for climate change, forests and water security and were rated in the top 1% of all suppliers by EcoVadis for the fifth consecutive year. In 2019, the approval of ambitious science-based greenhouse gas (GHG) targets was a major milestone. At the same time, we have maintained FSC™ certification for 100% of the forests we own and manage. There has also been a very clear focus on people and a strong focus on safety and health, with the 'work safe, home safe' approach focusing on a 24-hour safety mindset. Mondi's community engagement approach enables it to truly listen to its stakeholders, often facilitated by third parties so that it can be objective, transparent and credible.

What has been the biggest challenge Mondi has faced on the road to achieving its targets?

AK: The single biggest regret I have is that, despite an industry-leading safety record, we have experienced fatalities over the last five years. This is a huge sadness to me and it emphasises that we still have much to do to drive our safety culture and make sure all our people and our contractors

get home safely every day. I believe sustainability initiatives should be long term in nature, and safety is no different. Five years might seem like a long time but, to make things truly sustainable, we must embed them deeply in our organisation, changing behaviours and mindsets. That is why we have set a longer time horizon for our new Mondi Action Plan 2030 (MAP2030) commitments through which we'll continue to improve our performance.

What will Mondi focus on next to achieve further meaningful sustainable impact?

DR: As Andrew describes, we need a longer-term vision and a clear focus on the material topics where we can really make a difference. That's why we are moving from 10 Action Areas to three core priorities. These three areas are very memorable: circular solutions, created by empowered people, taking action on climate. But the fact that we are focusing on three core areas doesn't mean we have less work to do. Supporting these areas are a set of broader responsible business practices, all with very clear commitments and targets to drive strategy and action throughout the business.

Finally, what do you see as the key challenge for the coming year?

DR: I think we need a change of mindset in industry to drive collaboration on sustainable solutions between competitors and with customers. We need to reach a new level of transparency and openness. This work is not easy but it is energising and important. We need to stand in the shoes of our consumers – we must build common standards, such as for product recycling and labelling, to make it easier for us all to be a part of the solution. We still have a lot to do in this regard and we need

to develop a shared approach of working together, at scale, and across value chains to drive change on topics like plastic pollution. This is what Mondi is trying to pioneer through its strategic partnerships and collaborations.

AK: We have to make more progress on sustainable packaging. Sustainable solutions are at the heart of our offer and it's encouraging that we are seeing more customers coming to us to develop sustainable packaging while we are investing in processes and packaging lines to accommodate new innovations. This is a much needed evolution that has gained traction in the last year. While it has accelerated in areas where there is regulation, we are also starting to see changes being driven by consumers. I believe this will continue and there is considerable potential for Mondi to grow with our unique sustainable packaging, offering paper where possible, plastic when useful.

“To make things truly sustainable, we must embed sustainability initiatives deeply in our organisation, changing behaviours and mindsets.”

Andrew King
CEO Mondi Group

Sustainability topics discussed by the Sustainable Development Committee

As part of our sustainability governance, the Board maintains clear oversight of policies, systems, practices and progress in managing all aspects of sustainability. The following is a summary of the key sustainability topics that the Sustainable Development Committee of the Board focused on during the year.

supply of masks and PPE to our operations; distancing and hygiene rules; and adapting our production sites and offices to mitigate related risks. Members discussed safety performance and selected incident investigation outcomes, including the two contractor fatalities that occurred during 2020 (see [page 25](#)). The Committee received an update on training, engagement and monitoring of contractors, including in the lead-up to major maintenance shuts. The Committee reviewed total recordable case rate (TRCR) classifications with a working group assigned to address rising incidents in specific categories. Barriers to achieving our TRCR milestones were noted to include gaps between the performance of our recent acquisitions and the Group's standards, with measures put in place to address this, including training and ongoing engagement with sites.

Climate crisis

The Committee focused on climate-related risks and opportunities and received feedback from the work done by the cross-functional team established to evaluate these on an ongoing basis. Key areas assessed in 2020 were plantations, Komi forests, wood procurement, products and material operations. Results and estimated financial impacts were reviewed and the need for ongoing refinement was acknowledged, given the high degree of uncertainty around the impact quantification over long time horizons. The Committee reviewed our reporting against the disclosures recommended by the Task Force on Climate Related Financial Disclosures (TCFD) (see [page 46](#)).

2020 and 2030 commitments

The Committee regularly reviewed progress against our 2020 GRM commitments and considered actions taken to address the challenges

– for example related to contact water use. The Committee discussed environmental incidents, particularly those involving community impact and resulting in odour complaints (see [page 60](#)). The Committee reviewed and confirmed the proposed 2030 commitments and noted the benchmarking process and extensive consultation with internal stakeholders.

Human rights

The Committee discussed Mondi's progress in assessing its human rights risks, including an overview of processes and procedures to address potential risks of human trafficking and modern slavery. Discussions included developments in the Responsible Procurement process and work with the Danish Institute for Human Rights (DIHR) on human rights due diligence and policy development. It received the findings of the human rights gap analysis conducted by DIHR and reviewed the actions proposed to prioritise and address the gaps in our practices and approach (see [page 36](#)). The Committee approved Mondi's 2020 Modern Slavery Act statement.

Stakeholder participation

Last year, the Committee agreed to invite input from external stakeholders to gain fresh perspectives on key issues. In 2020, WWF South Africa's Head of Fresh Water attended a Committee meeting to provide an overview of WWF's work to promote water security in South Africa. The overview included a summary of water challenges which are being exacerbated by the climate crisis. The importance and success of cross-sector partnerships, such as the WWF-Mondi partnership, for addressing these issues and developing solutions was discussed. WWF South Africa's views on future outlooks and solutions for the water crisis in the country were also shared.

The Board received a presentation by Mondi's legal advisors on emerging and evolving regulatory and soft law regimes related to sustainability risks and opportunities, in particular to highlight the key impacts of these regulatory changes on Mondi.

Engagement with key stakeholder groups

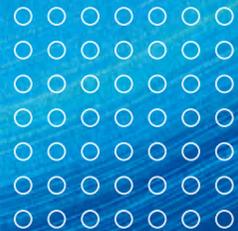
The Committee reviewed the Group's relationships and engagement with key stakeholders. Discussion focused on the partnerships that will be required to support Mondi in achieving MAP2030 commitments and our primary areas for engagement. Social and community engagement mechanisms were discussed, focusing on COVID-19-related community contributions. The Committee also reviewed the key multi-stakeholder initiatives in which Mondi is involved.

Sustainable products

The Committee discussed the Group's product stewardship areas and reviewed the role of the internal Product Stewardship Network, noting that this had been restructured to better meet the evolving needs of the business and to formalise the link to our EcoSolutions approach. An overview of the developments related to the Single-Use Plastics Directive was provided. The Committee noted Mondi's engagement with industry associations on the applicable definitions in classifying products as single use and materials as plastic, and our commitments in relation to plastic. The Committee agreed that Mondi's focus should be on supporting customers to meet their sustainability objectives and on establishing partnerships and collaboration to reach shared goals. It reviewed Mondi's participation in Cepi's 4evergreen alliance, noting its aim to boost the contribution of fibre-based packaging to a circular economy.

Safety and health

The safety and health of our employees and contractors is a key topic at every meeting. In 2020, this included regular discussion of the safety and health implications of COVID-19. The Committee reviewed safety performance at every meeting and agreed measures to keep employees and contractors safe, including:



Sustainable by Design

Our purpose brings us together in contributing to a better world by making packaging and paper that is sustainable by design

The Mondi Way...

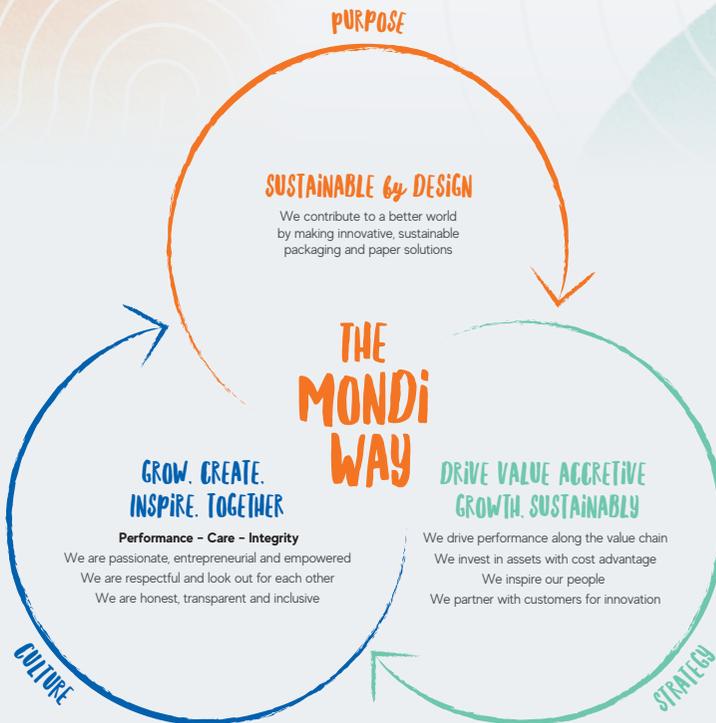
The Mondi Way shows how our shared sense of purpose is intrinsically connected to our strategy and culture, enabling us to create best-in-class products for our customers and shared value for our stakeholders. Our four strategic value drivers set a clear roadmap for the future and, together with our resilient business model and manufacturing excellence, give us distinct competitive advantages. Our culture is centred around empowering people to be passionate and entrepreneurial in a respectful and inclusive way, underpinned by our values of Performance, Care, and Integrity.

...drives innovation and collaboration to create sustainable solutions...

Consumers and brands are looking for products that minimise impact on the environment and maximise functionality. Our customer-centric EcoSolutions approach enables us to partner with customers to identify and develop the most sustainable solutions from our uniquely broad range of packaging using paper where possible, plastic when useful. We collaborate along the value chain to eliminate unsustainable packaging, leading the transition to a circular economy.

...helping customers to achieve their goals

Mondi is proud to be recognised for our innovation and ability to create forward-thinking solutions for thousands of local and global brands. Our R&D centres and innovation activities span the entire value chain. We also work with external partners to maximise the potential of our products. In the past year we have celebrated a number of innovation awards across our business, including eight wins at the 2021 WorldStar Packaging Awards.*



EnvelopeMailer

A 100% renewable, recyclable and highly protective alternative to plastic mailers that use bubble foil protective padding



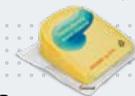
PerFORMing

Formable paper-based food tray that reduces CO₂ emissions and is recyclable in certain paper streams



Thermoforming

A fully-recyclable mono-material high barrier film which has a significantly lower carbon footprint compared to existing solutions



FloralBox

A modular e-commerce solution that optimises packaging and protection requirements for the transportation of plants



SupremeBox

Size-adjustable e-commerce packaging that provides for more efficient box sizing and fulfilment



BrakeBooster

Packaging for automotive components that optimises filling processes while reducing weight and material use



BrightBox

A 100% recyclable alternative for car headlights that replaces multiple-material packaging with a single corrugated solution



OnePiece

Innovative packaging designed for transport and display that can protect products of irregular shape



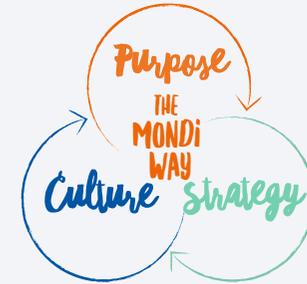
* Announced December 2020. Two awards won in partnership with a customer

Our business model

The Mondri Way connects purpose, strategy and culture to our business model.

Our purpose is to contribute to a better world by making innovative, sustainable packaging and paper solutions. We do this by delivering performance across our integrated value chain in line with our strategy, ensuring we create value in a sustainable way for all of our key stakeholders. Our four strategic value drivers underpin this strategy and build on the competitive advantages we enjoy today, setting a clear roadmap for investment and operational decisions into the future.

Our culture connects, guides and inspires our people to achieve Mondri's purpose. The dedication, commitment and willingness of our employees is essential to delivering on our strategic priorities as we continue to contribute to a better world, together.



What we rely on

We sustainably manage our natural resources, leverage our relationships and allocate capital responsibly to create value for our stakeholders.

Relationships

The integrated nature of our business means that we rely on strong relationships to drive our business forward for our shared success. Our people make Mondri and together we deliver against our key initiatives and operational deliverables. Our partnerships with our customers and suppliers ensure that we optimise our value chain and deliver solutions to our customers that meet their requirements. We engage with our communities to address challenges and create opportunity; with investors to communicate our performance and refine our strategy; and with partners, industry associations and regulators to shape our context.

Resources

As part of our manufacturing processes, we require raw materials such as wood, paper for recycling, chemicals, polymers and other resources, most notably water and energy. We are committed to ensuring the responsible procurement of these materials and to protect and safeguard the biodiversity and ecosystems in which we source these natural resources.

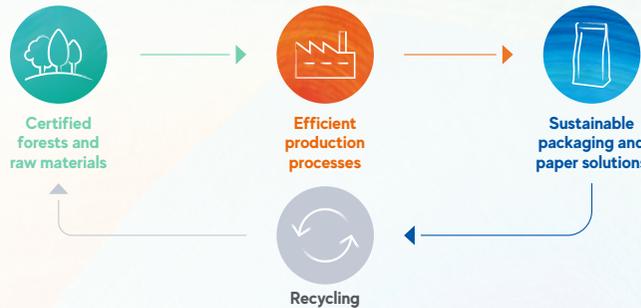
Financial

We have a disciplined approach to invest in our asset base through-the-cycle. Our strong cash generation and robust financial position provide us with strategic flexibility to pursue value accretive propositions when they arise ensuring we are positioned strongly to drive value for our stakeholders.

What we do

Our integrated value chain

We have an integrated business that leverages our distinct competitive advantages, and key relationships and resources.



Managing our risks

Successfully mitigating the potential impact of risks on our business model and appropriately setting our risk appetite is critical to ensure we continue to generate long-term value for our stakeholders.

Examples of the value we create

By combining our integrated value chain, strong relationships and management of resources, and leveraging our competitive advantages, we create value for our stakeholders in line with the Mondri Way.

Employees

23%
reduction in total recordable case rate (since 2015)

In addition to our focus on safety, we invest in the development of our people, supporting a diverse, skilled and committed workforce

Customers

8
WorldStar Packaging Awards (two with a customer)

We partner with our customers to help them meet their sustainability commitments leveraging our unique EcoSolutions approach, offering paper where possible, plastic when useful

Communities

€168 million
direct taxes paid

In addition, the Group has invested €50 million in local community initiatives in the past five years including more than €3 million of direct financial and in-kind donations in response to the COVID-19 pandemic

Suppliers and contractors

2,000
key suppliers

We engage with our suppliers, encouraging supply chain transparency and fair working conditions, and undertake actions to mitigate our risks

Investors

42%
five-year total shareholder return

Supported by a strong balance sheet, we continue to declare dividends in line with our cover policy and have recommended a total dividend for the year of 60.00 euro cents per share

Partners, industry associations and regulators

Numerous
strategic partnerships and initiatives

Our global collaborations ensure we can contribute to finding sustainable solutions for the collective challenges we all face and bring about meaningful change

What makes us different

We leverage our distinct competitive advantages to drive value and unlock opportunities for our business and our stakeholders.

Unique packaging producer

As a leading producer of both paper and flexible plastic solutions, we are uniquely positioned to meet our customers' demands with our broad range of sustainable packaging.

Leading market positions

Our leading market positions provide scale, reliability and the capability to innovate with our customers and service key accounts.

Cost-advantaged assets

We have well-located operations with access to competitive fibre and a high-quality, well-invested asset base.

Vertical integration

Our vertically integrated network reduces the Group's exposure to price volatility, providing security of supply and production and logistics optimisation.

Focus on continuous improvement

We are continuously driving performance along the whole value chain, focusing on excellence and improvement across our processes.

Strong financial position

Our disciplined capital allocation and robust financial position provides us with strategic flexibility.

Sustainable by Design

We embed sustainability into everything we do, leveraging our sustainability-centred packaging solutions and operating practices, making us an ideal partner and employer of choice.

Entrepreneurial culture

Our entrepreneurial culture brings the best out of Mondri's people, driving us to Grow. Create. Inspire. Together.

For more information on our business model please see page 18 of our 2020 Integrated report

Our businesses

Together we are...
meeting our customers' needs with a broad range of innovative, sustainable solutions

We work with thousands of global and local brands, offering our customers a wide range of solutions using paper where possible, plastic when useful. Our businesses create corrugated packaging, paper and plastic-based flexible packaging, specialised solutions and uncoated fine paper.

Here is a selection of products illustrating the variety of industries we serve:

Consumer and retail

Around 50% of Group revenue

MailerBAG

A patented paper bag for e-commerce shipments that is easy to open and reclose and convenient to return



EcoVantage

A sustainable and effective paper alternative to plastic bags



Coral Tray

Corrugated alternative to plastic fruit punnets and plastic film wrapping



Functional Barrier Paper

Recyclable barrier papers for FMCG food applications which can replace simple, low barrier PE films



Building and construction

Around 15% of Group revenue

SPLASHBAG

Designed with an outer paper ply that is water-repellent and formulated to keep high tensile strength in wet environments



Chemicals, industrial, agriculture, other

Around 15% of Group revenue

stac-pac®

Made from corrugated board and supporting wooden frame built for shipping and storage of heavy loads



Pasted open mouth bags

Innovative, high strength paper bags with efficient filling features and superior product protection



Paper for home, office and professional printing

Around 15% of Group revenue

Pergraphica®

Full spectrum premium printing papers for distinguished design work and creative communications



NAUTILUS® ProCycle

A 100% recycled fibre, CO₂ neutral high-white paper for professional applications



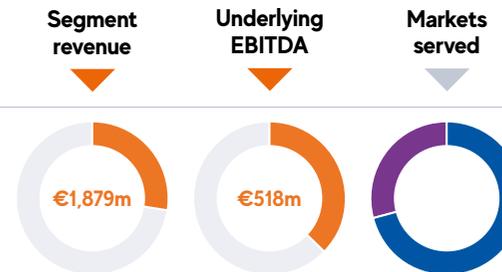
Key:

- Consumer and retail
- Building and construction
- Chemicals, industrial, agriculture, other
- Paper for home, office and professional printing
- Market pulp and other

Business units

Corrugated Packaging

We are a leading containerboard producer with an integrated, well-invested, cost-advantaged asset base. We use our containerboard to make a range of regular and bespoke corrugated solutions designed to keep our customers' products safe, and differentiate their brands in-store and online. Our cost-effective fibre-based solutions are made from a renewable resource, are lightweight and recyclable.



Leading market positions

- #1** virgin containerboard producer in Europe
- #1** containerboard producer in emerging Europe
- #3** corrugated solutions producer in emerging Europe

Flexible Packaging

As a global leader, we offer our customers a unique range of sustainable flexible packaging solutions using paper where possible, plastic when useful. Our world-class integrated mills produce kraft paper that we, and our customers, convert into strong yet lightweight paper-based solutions. We also make a variety of flexible plastic-based consumer packaging giving our customers additional functionality when required. Wherever possible, we optimise material usage, prioritise recyclability and use recycled content.



Leading market positions

- #1** kraft paper producer globally
- #1** paper bag producer in Europe and a global leader
- #3** consumer flexible packaging producer in Europe

Engineered Materials

We produce a range of specialised solutions leveraging our expertise across the Group, focusing on products that are designed for recycling and use recycled content. Our functional papers and films protect adhesive surfaces or provide barriers against, for example, moisture, oxygen or aroma across a range of applications, including our packaging solutions. Our personal care products include soft non-woven fabrics, uniquely stretchable elastic films and mechanical fastening components used in everyday life.



Leading market positions

- #1** commercial release liner producer in Europe
- #2** extrusion coatings producer in Europe

Uncoated Fine Paper

Our vertically integrated, well-invested, cost-advantaged paper mills make a wide range of environmentally sound home, office and professional printing papers, including design and luxury packaging papers, tailored to the latest digital and offset print technologies. We manage forests in Russia and South Africa providing sustainable wood fibre for our operations. Our innovative paper solutions, including a growing amount of recycled fibres, meet our customers' needs in a cost-effective and sustainable way.



Leading market positions

- #1** uncoated fine paper supplier in Europe (including Russia)
- #1** uncoated fine paper producer in South Africa

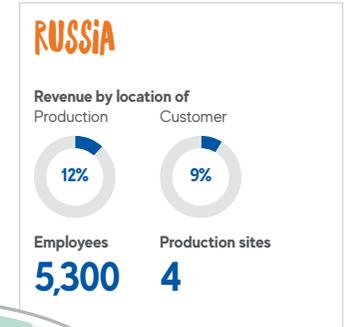
Percentages are based on rounded management estimates. The remaining portion of Group revenue is derived from market pulp, wood, newsprint and energy sales.

Where we operate

Mondi employs around 26,000 people at 100 production sites across more than 30 countries, with key operations located in Europe, North America and Africa.



Revenue from customers in South America represented 2% in 2020. Production at the Group's Cartagena (Colombia) paper bag plant commenced in 2021.



Production sites per business unit

Corrugated Packaging	▲ Mill (5) ● Converting plant (16)
Flexible Packaging	▲ Mill (5) ● Converting plant (57)
Engineered Materials	● Converting plant (15)
Uncoated Fine Paper	▲ Mill (6)

Group offices

London	■ Colombia	● Iraq	● Oman	● Sweden	▲●
Vienna	■ Côte d'Ivoire	● Italy	● Poland	▲● Thailand	●●
	Czech Republic	●● Jordan	● Russia	▲●● Turkey	▲●●
	Egypt	● Lebanon	● Serbia	● Ukraine	●
Austria	●●●●▲ Finland	▲ Malaysia	● Slovakia	▲▲ USA	●●
Belgium	● France	● Mexico	● South Africa	▲▲	
Bulgaria	▲ Germany	●●● Morocco	● South Korea	●	
China	● Hungary	● Netherlands	●● Spain	●	

Together we are...
delivering innovative packaging and paper solutions to customers around the world



Our global context

Together we are...
looking at the impact of
global issues on Mondi



The global response to the COVID-19 pandemic has shown we have the ability to collaborate and innovate as a global society when it comes to solving urgent issues impacting humanity. Empowered by innovative technology, the challenge has redefined how we live, work, learn and consume. At the same time, it is important to remember that the climate crisis has not gone away.

We now have an opportunity to apply the same creative, innovative and problem-solving approach that has led to the development of vaccines, to tackling the climate emergency and cutting carbon emissions globally. Here, we set out some of the global megatrends and themes shaping society, industry and our business.

The climate crisis

In 2018, the UN's Intergovernmental Panel on Climate Change (IPCC) Report¹ gave us all until 2030 to cut emissions by half to avoid some of the worst potential impacts. However, despite international commitments made through The Paris Agreement and other frameworks, emissions continue to rise. The knock-on effects for biodiversity, water and food security are detrimental to the wellbeing of humanity.

Latest studies from the World Meteorological Organization predict the actual point of no return to be in 2024;² reinforcing the need to act now. Setting and delivering science-based targets is key for businesses to reduce emissions to the levels required. With investors placing growing importance on how companies manage their climate-related risks and wanting to know how they impact business models and operations, the climate crisis will increasingly influence companies' long-term financial standing, reputation and investment potential.³

Plastic waste

Every year, around 8 million tonnes of plastic waste escapes into the oceans from coastal nations.⁴ The impact is driving environmental awareness and anti-plastic sentiment among consumers, especially younger generations. To address the crisis and relieve pressure on natural resources, there is an urgent need to design for recyclability, improve waste sorting and recycling at scale. Building circular economy models that transform waste into materials of value is an important lever for progress.

Before the COVID-19 pandemic, sustainability was top of mind for the packaging value chain – particularly in relation to regulatory and public concerns regarding single-use packaging waste. With the onset of the global health crisis, concerns about hygiene and food-safety issues have become higher priorities.

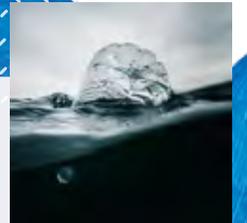
Legislation like the Single-Use Plastics Directive and the Circular Economy Action Plan in Europe, and country bans on plastic bags in many other countries, are driving development of sustainable solutions. However, the current low purchase price of virgin plastic resin means it is more affordable than using recycled content. The cost difference is being driven by increased oil production and rising demand for recycled plastic as more brands make commitments to use recycled materials in products.⁵

Technology for chemical recycling and improved and harmonised collection and sorting mechanisms as well as legislation on plastic will be vital to drive positive change.

Human rights and social impact

Respect for human rights has become a global minimum standard of conduct for businesses, within their own operations and across their supply chains. Issues such as child labour and forced labour, safety and security, systemic racism, respect for indigenous people and land claims, and impacts of pollution on people's health are increasingly visible and exposed publicly. Women and girls are disproportionately impacted by issues such as forced labour and one in four victims of modern slavery are children.⁶ The pandemic has taken a particular toll on the poor,⁷ turning the spotlight on issues such as access to healthcare, livelihoods, extreme poverty and world hunger.

8 MILLION
TONNES
of plastic waste
escapes to the
oceans every year



Endnotes appear when mouse hovers above and hyperlink to page 114 when clicked.

Our global context



The changing workplace

The COVID-19 pandemic changed the way we live and work almost overnight, with many people compelled to work remotely where possible. Companies worldwide had to find creative ways to enable their employees to work safely, provide infrastructure and bandwidth to enable flexible working and collaboration, and address the risks associated with data integrity, security and privacy.

In recent years, mobile technology has changed the way we do business, making it possible to work from anywhere. This has blurred the boundaries between work and personal lives, particularly for those working from home. Research shows that three out of five millennials expect flexibility from employers, but less than 5% consider home to be their primary workplace.⁸

Companies need to create working environments where people want to be and meet diverse expectations and priorities for purposeful and flexible careers. Against a backdrop of rapid innovation and decarbonisation, skills development will be crucial for adapting the workforce, where emerging technologies and evolving business models may reduce the need for certain jobs.

Changing consumer behaviour and the rise of regionality

The pandemic has changed consumer purchasing behaviour, with many preferring or needing to purchase online to avoid the potential health risks of shopping in stores. With its growing convenience, accessibility and speed of delivery, e-commerce has seen rapid growth in demand for everyday products like food, drinks and groceries.⁹ Experts predicted that e-commerce sales would reach \$4.13 trillion in 2020.¹⁰

Businesses are expected to take a proactive stance on tackling human rights issues and social impacts, particularly in countries of weaker governance. This is reflected in expanding legislation and includes addressing social and environmental concerns in supply chains. Occupational safety and health is a key element of decent working conditions and stakeholders expect businesses to apply robust risk management controls and procedures to create a healthy and safe working environment.

Well informed and price savvy consumers expect value, convenience and a branded experience from their online purchases. At the same time, they are less trusting of brands and demand transparency on safety, health and sustainability claims. Paradoxically, the growth in e-commerce is accompanied by a counter-trend to buy locally and support local business. Regionality is an important factor for increased transparency, with short transport routes and greater product traceability creating authenticity and trust. A 2020 report from EY predicts that regionalisation will characterise the future of globalisation, spurred on by societal values, legal structures and regulatory approaches. Technology could enable a more regionalised future with distributed manufacturing driven by 3D printing, potentially further shrinking and localising global supply chains.¹¹

“The pandemic has seen an acceleration in online shopping beyond expectations for 2020, in particular in new markets across Central and Eastern Europe, with many consumers experiencing new retailers, websites and brands.”

Armand Schoonbrood
COO of Corrugated Solutions at Mondi



Industry insights



Jori Ringman

Graham Houlder

Collaboration and engagement with others in our industry is fundamental to our approach. The insights and opportunities for collaboration we gain enable us to manage common risks and scale our positive impact. We spoke to two of our partners about the sustainability issues shaping our industry.



Jori Ringman (JR) is Director General of the Confederation of European Paper Industries (Cepi).



Cepi is the European association representing the paper industry, a non-profit-making organisation based in Brussels.



Graham Houlder (GH) is Project Coordinator of 'A Circular Economy for Flexible Packaging' at CEFLEX



CEFLEX is a collaborative initiative that brings the entire value chain of flexible packaging in Europe together to tackle the technical and business barriers to a circular economy.



What were the key trends related to sustainability impacting the paper and packaging sectors, in 2020?

JR: We've seen the impacts of COVID-19 accelerating many trends across the paper industry. They include a strong drive towards substitution of fossil materials with renewable, recyclable alternatives. This is increasing the diversification of product portfolios, with innovations being launched like never before. Although paper and paper-based packaging is the world's most recycled material, we're looking at raising the bar to move from a recycling rate in Europe of 83% today for fibre-based packaging to 90% by 2030.

GH: A few weeks before Europe went into lockdown, CEFLEX met with 200 stakeholders in London. Our key message was that the sense of urgency from multiple perspectives to achieve a circular economy had reached a tipping point. Developed in collaboration with Mondi and other stakeholders, our 'Designing for a Circular Economy' guidelines provide a new level of clarity, helping design flexible plastic packaging solutions that are recyclable. Although we've seen a focus on closed product loop recycling, increased attention to chemical recycling working in conjunction with mechanical and other advanced recycling processes will enable these new (recycled) materials to displace and reduce the need for virgin fossil fuel-derived materials in the future.



How are regulatory trends impacting the paper and plastic industry?

JR: The reduction in carbon emissions delivered by the paper industry has resulted from carbon reduction regulation that has been in place for many years. Our industry has cut carbon emissions by 27% since 2005 and is the largest industrial generator and user of renewable energy in Europe. Now, the European Green Deal is driving our industry transition towards climate neutrality. To achieve it, the regulatory framework must remain stable and predictable – otherwise regulatory risk could discourage investments. We need regulation to de-risk and reward investments in energy efficiency, CO₂ avoidance and renewable energy and promote availability of affordable renewable energy sources – such as electricity, biogas or hydrogen – without sectoral restrictions.

GH: I agree on the need for a clear and stable regulatory framework to support our circular ambitions. The sheer quantity of plastic and packaging legislation being proposed at the moment risks draining resources and directing focus away from delivering the circular economy. There is a risk that recycled plastic prices become significantly higher than virgin plastic and consequently are commercially uncompetitive. This could drive investment away from the sorting and recycling infrastructure that is needed for a circular economy. Initiatives like the Basel Convention make it increasingly challenging to export sorted plastic with the implication that most of the currently exported materials will need to be recycled in Europe in the medium term.



How crucial is collaboration to achieving the systemic change that is needed?

JR: Small and medium-sized enterprises make up two-thirds of the European paper industry and even global leaders like Mondi cannot solve the big challenges alone. Systemic change can only be achieved through industry-wide collaboration. This is why we launched the 4evergreen alliance, a cross-value chain alliance of over 50 companies, including Mondi, to perfect our circularity. It is the first time that an alliance of this scale will connect members across the entire value chain to gain deeper insights into sustainable sourcing, material design, converting, recycling, reuse and waste management for fibre-based packaging.

GH: Collaboration is crucial for supporting the CEFLEX roadmap and giving companies like Mondi a firm basis on which to continue innovating, investing and implementing their part of the circular economy. Driving systemic change towards the circular economy is not simple; it is multi-faceted and we need a clear vision of a circular economy for plastic packaging so that all parts of the value chain can understand their role in delivering it. A level playing field is key and we know it requires extended producer responsibility in all countries, designed to ensure system costs are covered in the product price so that no one has an advantage because their products are less circular and sustainable.

Our Sustainability Approach

Together we are...

keeping sustainability
firmly at the heart
of our strategy

Andrew King
CEO Mondi Group



"Sustainability is embedded in everything we do. Our focus on sustainability has contributed to our strong performance across the business and is fundamental to our success."



Our Growing Responsibly model

Our GRM has enabled us to clearly communicate progress across a wide range of complex issues

Our Growing Responsibly model (GRM) is the framework through which we have responded to sustainability challenges and opportunities for the past five years.

Our GRM has been integral to our success. It has formed part of our business strategy to drive value accretive growth sustainably and to contribute to the United Nations Sustainable Development Goals (SDGs) and other global initiatives. It has also enabled us to clearly demonstrate, monitor, improve and communicate our sustainability performance across the value chain.

Applicable to all our operations Group-wide, the GRM is designed to articulate the focus and value of our sustainability commitments to our business and our stakeholders. The model comprises 10 Action Areas which reflect the aspects of sustainability that are most relevant to Mondi and our stakeholders. Each Action Area includes commitments running to the end of 2020 and a carbon emissions commitment that runs to 2050. In 2018, we became signatories of the Ellen MacArthur Foundation's Global Commitment, which also runs to 2025.

Our materiality assessment (see [page 87](#)) defined the relative importance of our material issues to our stakeholders and identified new and emerging issues. We have used this and our ongoing engagement with stakeholders to inform the disclosures covered in our reporting. We also used the outcomes of the materiality assessment and stakeholder engagement to shape our future commitments.

We see it as a key responsibility of business to help deliver the UN SDGs and we highlight the main links between our 10 Action Areas and the corresponding SDG targets. A detailed overview can be found in our SDG Index online, which identifies the links with all the SDGs and their respective targets, mapped against our actions described throughout the report.

We identified seven SDGs where we believe we have the greatest impact and opportunity to make a real and lasting difference at scale: SDG 6 (clean water and sanitation), SDG 7 (affordable and clean energy), SDG 8 (decent work and economic growth), SDG 9 (industry, innovation and infrastructure), SDG 12 (responsible consumption and production), SDG 13 (climate action) and SDG 15 (life on land).

[Read more about the UN Sustainable Development Goals page 22](#)

2020 marks the final year of the GRM as we close out our current five-year commitment period. It has served us well in being so comprehensive and has enabled us to communicate progress across a wide range of complex issues. The role of sustainability has evolved considerably over the past five years and we have reflected in detail on these changes and the learnings from our GRM to shape the Mondi Action Plan 2030 (MAP2030), our next set of commitments (see [page 20](#)).



Gladys Naylor
Group Head
of Sustainable
Development

“Our Growing Responsibly model has successfully guided our responses to sustainability challenges and opportunities these past five years.”

GRM performance (2016–2020)

Together we are...
making meaningful progress to build an even more sustainable business

As we close out the final year of the GRM, these results show how far we have come since its inception in 2015. We are proud to have met most of our targets, while others have been more challenging.

This diagram provides a high-level overview of our consolidated five-year performance. More detailed information on what was achieved in 2020 and our overall impact is set out within each of our 10 Action Areas.

- Target on track /achieved
- Target not achieved
- Achievement behind plan



1 Employee and contractor safety and health

- Avoid work-related fatalities
- Prevent life-altering injuries
- Reduce total recordable case rate by 5% against 2015

See page 24

2 A skilled and committed workforce

- Engage with our people to create a better workplace

See page 30

3 Fairness and diversity in the workplace

- Promote fair working conditions and diversity in the workplace

See page 35

4 Sustainable fibre

- Maintain FSC™ certification for 100% of our owned and leased forest lands and promote sustainable forest management
- Procure at least 70% of wood from FSC™- or PEFC™-certified sources with the balance meeting our company minimum wood standard

See page 40

5 Climate change

Our science-based targets to 2025 and 2050

- Reduce Scope 1 and 2 GHG emissions 34% per tonne of saleable production by 2025 and 72% per tonne of saleable production by 2050, from the 2014 baseline
- Reduce Scope 2 GHG emissions 39% per MWh by 2025 and 86% per MWh by 2050, from the 2014 baseline

See page 45

6 Constrained resources and environmental impacts

- Reduce specific contact water consumption by 5% against the 2015 baseline
- Reduce specific waste to landfill by 7.5% against the 2015 baseline
- Reduce specific NOx emissions by 7.5% against the 2015 baseline
- Reduce specific effluent load (COD) by 5% against the 2015 baseline

See page 53

7 Biodiversity and ecosystems

- Promote ecosystem stewardship in the landscapes where we operate through continued multi-stakeholder collaboration

See page 61

8 Supplier conduct and responsible procurement

- Encourage supply chain transparency and promote fair working conditions together with our key suppliers

See page 66

9 Relationships with communities

- Enhance social value to our communities through effective stakeholder engagement and meaningful social investments

See page 71

10 Solutions that create value for our customers

- Encourage sustainable, responsibly produced products

Our additional commitment from 2018

- Ensure 100% of plastic packaging is reusable, recyclable, or compostable by 2025

See page 78

A year in transition

Together we are... developing a new plan for sustainability

As we reach the end of our five-year Growing Responsibly model (GRM) commitment period, we have evaluated our sustainability framework and defined a pathway to 2030. From our stakeholders such as investors, customers and communities to our colleagues and members of the Board – we have listened to feedback and used it to shape our new commitments defined by our Mondi Action Plan 2030 (MAP2030).



Lars Mallasch
Group
Technical &
Sustainability
Director

The evolution of the sustainability landscape

What are the key considerations you have taken onboard?

We started by asking our Executive Committee a question about the role we want to play. The consensus was clear. We want to lead on tackling the issues where we can have the most meaningful impact. To do this, we needed a credible framework that allows all of us at Mondi to move together. The starting point is the Mondi Way and our purpose to be Sustainable by Design by making innovative, sustainable packaging and paper solutions. This ambition was translated into commitments and targets through broad engagement across the businesses before being tested and approved by the Executive Committee and the Board.

In delivering and reporting against the existing 2020 commitments, we have become far more aware of the needs of our stakeholders. We have also seen the UN SDGs set a clear agenda across all areas of society. During that time, certain topics have come to the fore – the speed and scale of the plastic debate, for example, has been phenomenal. Today, sustainability is front and centre of our conversations with investors and stakeholders and it is at the centre of our strategy.

We considered what is important to our employees, customers, communities, investors and partners in our sector. We benchmarked our performance and consulted stakeholders across Mondi. As a result, we arrived at three Action Areas focusing on our products, people and climate; underpinned by responsible business practices – together making up MAP2030.

The transition from GRM to MAP2030

Mondi's Growing Responsibly model has delivered many successes. What have you learnt and done differently in MAP2030?

It's important to recognise the great job the GRM has done for our stakeholders and our business. It has enabled us to significantly improve our performance across all our Action Areas. Today, we are in a position where sustainability is seen as a competitive advantage for Mondi. We plan to build on this with our new MAP2030 commitments.

A lot has changed since we developed the GRM. At that time, corporate sustainability was focused predominantly on governance and risk. Going back 10 years, we had more than 30 sustainability commitments. Now, with MAP2030, we are focusing on our most significant sustainability priorities.

With MAP2030 we have moved to a 10-year timeframe, supported by shorter-term milestones – aligned with the 2030 timeframe of the UN SDGs.

Our focus has also been on creating a credible, memorable and actionable framework, empowering our people to drive change across Mondi.

Looking to the future and inspiring action

How can people get involved in contributing to a better world through MAP2030?

We want our employees to see MAP2030 as something that links what they do to our strategic initiatives and investments. The three Action Areas are grounded in our everyday business and translate into what people see happening around them. We have chosen our words with great care to use language that is simple, jargon-free and easily understood.

The roadmaps that we are developing together across our business will define the actions that we will take over the coming years to achieve our new MAP2030 commitments.

We cannot deliver our commitments alone – collaboration with others along the value chain is essential. Take our converting operations, for example. They operate as part of the value chain and must work with suppliers and customers to eliminate unsustainable packaging. We will continue to think carefully about where to target our future strategic partnerships and collaborations to drive innovation and transformation where they are needed most.

Mondi Action Plan 2030

Together we are...
**delivering on our
 purpose with
 clear sustainability
 commitments**

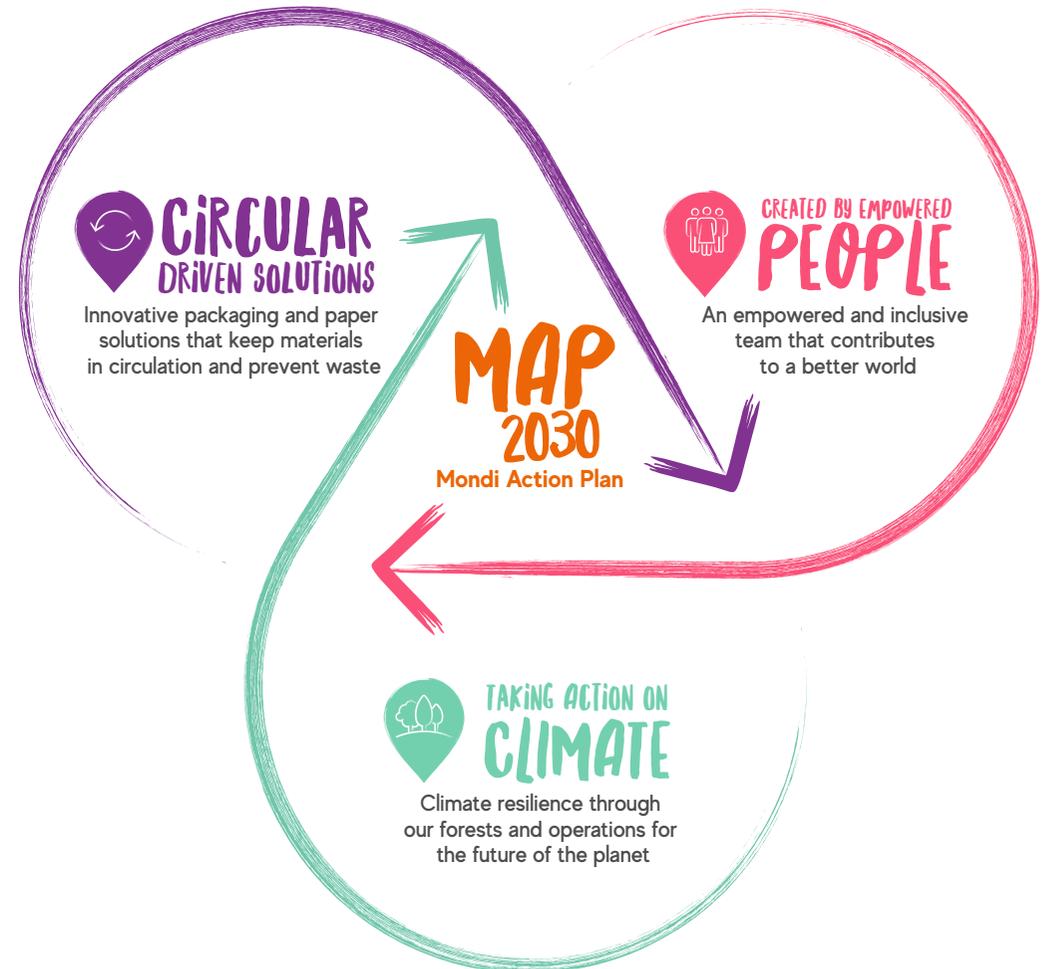
Our new sustainability framework is called Mondi Action Plan 2030 (MAP2030). It will help us navigate and monitor progress towards achieving our ambitious sustainable development commitments for the coming decade.

All commitments run until 2030, although some have 2025 milestones defined.

MAP2030 is built on our purpose – to contribute to a better world by making innovative, sustainable packaging and paper solutions. It applies to all our operations and our 26,000 people worldwide.



Andrew King
 CEO Mondi
 Group



Built on Responsible Business Practices

Business Ethics & Governance | Human Rights | Communities | Procurement | Environmental Impact



MAP2030

Mondi Action Plan



CIRCULAR DRIVEN SOLUTIONS...

Innovative packaging and paper solutions that keep materials in circulation and prevent waste

Commitments	Targets
Make our packaging and paper solutions reusable, recyclable or compostable	100% of our products are reusable, recyclable or compostable by 2025
Avoid waste by keeping materials in circulation	Eliminate waste to landfill from our manufacturing processes
Work with others to eliminate unsustainable packaging	Progress made through our partnerships and stakeholder engagement activities every year

Baseline 2020 for all commitments unless otherwise stated



CREATED BY EMPOWERED PEOPLE...

An empowered and inclusive team that contributes to a better world

Commitments	Targets
Build skills that support long-term employability	Enable our employees to participate in upskilling programmes
Provide purposeful employment for all our employees in a diverse and inclusive workplace	Achieve 90% Purpose Satisfaction score in our employee survey Achieve 90% Inclusiveness score in our employee survey Employ 30% women across Mondi
Create an environment that enables a positive work-life experience, valuing our safety, health and mental wellbeing	Zero fatalities and life-altering injuries 15% reduction of total recordable case rate Support our employees in pursuit of a work-life experience that enhances their wellbeing Operations to drive awareness of and take measures to improve health and mental wellbeing



TAKING ACTION ON CLIMATE...

Climate resilience through our forests and operations for the future of the planet

Commitments	Targets
Reduce our greenhouse gas (GHG) emissions in line with science-based targets	Reduce our Scope 1 and 2 GHG emissions by 34% per tonne of saleable production by 2025 and 72% by 2050 from the 2014 base year Reduce Scope 2 GHG emissions by 39% per MWh by 2025 and by 86% by 2050 from the 2014 base year Set a science-based Scope 3 reduction target by 2025
Maintain zero deforestation in our wood supply, sourcing from healthy and resilient forests	Maintain 100% FSC™ certification in our own forestry landholdings 100% responsibly sourced fibre with 75% FSC- or PEFC™-certified fibre procured by 2025 and the remainder meeting the FSC Controlled Wood standard Implement leading forestry measures to ensure productive, healthy and resilient forests
Safeguard biodiversity and water resources in our operations and beyond	Conduct water stewardship and biodiversity assessments at our mills and forestry operations by 2025, and implement required actions to address the findings by 2030

UN Sustainable Development Goals

We believe business has an important role to play in helping to deliver the UN SDGs. This year, as part of our transition to MAP2030, we reviewed the SDGs that are strategically relevant for Mondi in terms of our ability to contribute to positive change at scale and their impact on our business.

In 2020, building on our last materiality assessment, we engaged with internal stakeholders to reflect on our material issues, inform our MAP2030 commitments and consider how they enable us to leverage our positive contribution to the SDGs.

In determining the strategic importance of each SDG, we consider both the positive and potential negative impacts of our operations and factors such as the relevance of the SDG and its sub-targets across the value chain, alignment of SDG sub-targets with our activities, our ability to leverage skills and resources to help drive change, and the importance of relevant issues to our stakeholders. These factors have all contributed to the final selection of our strategically important SDGs.

This year, we supported the development of the World Business Council for Sustainable Development's Forest Sector SDG Roadmap to maximise the forest sector's unique potential to help deliver the SDGs (see page 43).

 For more information on how we report our performance against the SDGs, see our SDG Index online



CIRCULAR DRIVEN SOLUTIONS...

 **SDG 12**
Responsible consumption and production

Innovation in sustainable packaging and reducing plastic waste provides an opportunity to grow our business while reducing negative environmental impacts. Our manufacturing is resource-intensive and using raw materials and energy efficiently is fundamental to being a sustainable business. We engage and collaborate with partners to unlock fit-for-purpose paper- and plastic-based solutions as part of the circular economy.

 **SDG 9**
Industry, innovation and infrastructure

We contribute to economic and social development by investing in local infrastructure, creating business opportunities and driving collaboration. Through our purpose, to make packaging and paper that is Sustainable by Design, we are taking a lead role in product innovation and redesign to shape the future of sustainable packaging.



CREATED BY EMPOWERED PEOPLE...

 **SDG 8**
Decent work and economic growth

We work towards a fair, safe, diverse and inclusive workplace for 26,000 Mondi employees who benefit from good working conditions, skills development, physical and mental wellbeing, and purposeful employment. Our support for local enterprise creates wealth and employment, strengthens the local supply chain and promotes resilient communities.



TAKING ACTION ON CLIMATE...

 **SDG 6**
Clean water and sanitation

Our manufacturing is water-intensive; our mills and converting operations impact on water resources through their withdrawal and use of water. Water is also used in the fibre supply chain. We manage our impacts on fresh water resources to meet rising demand for sustainable products while safeguarding freshwater ecosystems at a landscape level.

 **SDG 7**
Affordable and clean energy

Increasing our energy self-sufficiency improves profitability and energy security and reduces carbon emissions. We invest in optimising energy and process efficiencies and replacing fossil fuel-based energy with renewable biomass sources. Some of our mills provide electricity generated by the plant to the local municipality and the surrounding community.

 **SDG 13**
Climate action

Our holistic approach includes protecting and improving the resilience of forests and freshwater ecosystems to enhance their crucial role in tackling the climate crisis. We support the global transition to a low-carbon economy through our science-based GHG reduction targets.

 **SDG 15**
Life on land

We manage around 2.3 million hectares of natural forestry landholdings in Russia and 254,000 hectares of plantation forestry landholdings in South Africa. We take a leading role in developing and implementing best practices to secure the long-term productivity and resilience of production landscapes while managing conservation areas and ecosystem services to maintain biodiversity, water and other natural capital.

Our 10 Action Areas

Together we are...

**reflecting on our
impact since 2015**

Lars Mallasch
Group Technical & Sustainability Director



"I'm very proud of what our businesses have achieved. When you look at the impact across our ten Action Areas, there are some real success stories, as well as some challenges we must continue to work on."





1 Employee and contractor safety and health

We believe everyone has the right to a safe and healthy workplace. We are committed to going beyond industry-minimum requirements to ensure our employees and contractors return home safely, every day. This means creating an empowering culture and building on the conscious and unconscious behaviours that improve the health and wellbeing of everyone who works with us.

Why is this important?

Keeping people safe is a moral and a business imperative. When an incident occurs, it can be devastating to the injured, their families and our colleagues. Our operations involve many high-risk activities and we and our stakeholders expect us to ensure the safety and health of our employees and contractors.

Together we are...
keeping ourselves and each other safe and healthy

What's our impact?

Launched in 2013, our Top Risks approach has enabled us to engineer many of the most serious risks out of our operations. However, while being among the safety leaders in our industry, we regrettably still experience fatalities – including two in 2020. In 2020 we had no life-altering injuries. Unfortunately, we experienced a life-altering injury in January 2021 when a contractor slipped during winter conditions while descending a harvester in our forestry operations in Finland. When falling, his ring caught on the grating of the step and as a result of the injury sustained, the finger had to be amputated.

Because we have improved our processes and tackled many physical risks, we see a large proportion of injuries being connected to the mindset of employees and contractors. As a result, we moved towards a 24-hour safety mindset and developed initiatives to address people's conscious and unconscious behaviours.

We also shifted to monitoring lead indicators as part of our safety programme, which drove our operations to address risks before an incident occurs.

Overall, our TRCR has decreased by 23% over the past five years. 204 safety colleagues have completed at least two modules of the safety and health professionals training programme and

1,566 managers attended first-line managers training. We also expanded our occupational health programmes and launched a new Employee Assistance Programme (EAP). In 2020, 2,951 employees and contractors participated in an HIV/AIDS voluntary programme in our South African operations.

Our commitments to 2020

Avoid work-related employee and contractor fatalities 5-year performance



Prevent life-altering employee and contractor injuries 5-year performance



Reduce total recordable case rate (TRCR) by 5% compared to 2015 baseline, including new acquisitions 5-year performance



Our strategic SDGs and target



SDG 8 Decent work and economic growth
 – Target 8.8 Protect labour rights and promote safe and secure working environments for all workers

For links to all other SDGs, see the full [SDG Index](#)

What's next?

We plan to be among the best in class for developing tools and initiatives to improve the safety and health performance of our operations. Our MAP2030 targets aim to avoid work-related fatalities and prevent life-altering injuries and achieve a 15% reduction in total recordable case rate (against a 2020 baseline). These will hold us accountable to our commitment to create an environment that values safety, health and mental wellbeing.





Employee and contractor safety and health

1 Ensuring the safety and health of our people

Manufacturing is a challenging and complex environment. Many of our employees and contractors work in potentially hazardous environments and the safety and health of everyone who works with us is our top priority. Mondi employees have gone above and beyond in 2020 to maintain high standards of safety and health during the pandemic.

The outbreak of COVID-19 brought new challenges for Mondi. As a result, we created a taskforce to focus on the relevant issues and provide support and guidance to the sites across the Group. This team meets twice per week and is chaired by the Group HR Director, who in turn reports back to the Executive Committee. Guidance and support in 2020 included communication materials and regular updates on COVID-19 trends and requirements. With the support of Group procurement, the team focused on and was able to secure masks for Mondi sites and implemented other best practice safety protocols to limit the spread of the disease in our operations.

We continue to embed clearly defined safety methodologies, procedures and controls and we continuously work to develop a strong safety culture to keep ourselves and each other safe. Measures include: close call and incident reporting and investigation; risk assessments; audits; permit to work requirements; energy isolation and lock-out systems; specialist training programmes; safety procedures; and contractor safety management.

We focus on the top risks at each site, putting engineering controls in place where feasible and ensuring continuous improvement in our safety and health controls and programmes. We carry out detailed investigations of all recordable cases to identify root causes and contributing factors and develop action plans in response.

When we acquire new assets and operations, Safety, Health and Environment (SHE) professionals form part of the acquisition team to ensure alignment with Mondi systems, methodologies, culture and approach. In 2020, we did not acquire any new businesses, but continued to integrate our Kuopio mill in Finland.

We engage in open and honest dialogue with our employees and contractors to identify risks and improve safety and health. New tools introduced in 2020 include our communication corners and engagement boards (see [page 26](#)).

Safety performance

With deepest regret, we experienced two fatalities in 2020. In January 2020, a contractor died as a result of an incident during demolition activities at our Syktyvkar mill (Russia). In June 2020, a contractor died as a result of an incident during cleaning activities of a power boiler at our Richards Bay mill (South Africa). There were no findings by authorities against Mondi in either case. Independent Group investigations were also carried out into both incidents and findings were shared across Mondi as applicable.

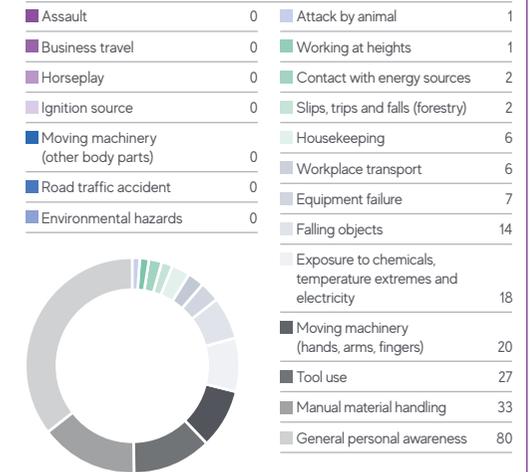
We had 217 recordable cases in our operations in 2020; 157 related to employees and 60 to contractors (2019: 239; 169 related to employees and 70 to contractors). This equates to a TRCR of 0.58; 0.68 related to employees and 0.43 related to contractors (2019: 0.63; 0.72 related to employees

Total recordable case rate (TRCR)
(per 200,000 hours worked)

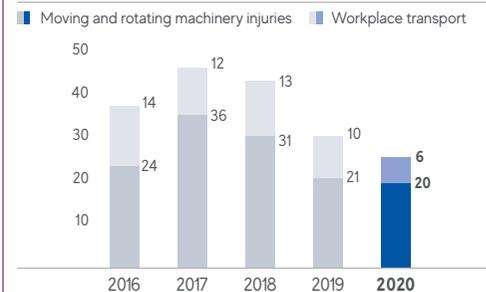


2019 has been restated to include the Kuopio mill and Egyptian paper bag plants acquisitions completed in 2018. The total number of hours worked (employees and contractors) in 2020 was 74.5 million hours (2019: 76.1 million hours, including Kuopio mill and Egyptian paper bag plants). Although we do keep record of COVID-19 cases, we do not include them in any of our key performance indicators.

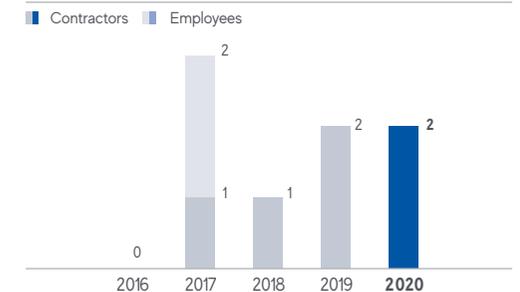
Total recordable cases by injury classification
(cases)



Injuries from high-risk activities
(cases)



Total fatalities of contractors and employees
(cases)



The fatality rate in 2020 was 0.005 (per 200,000 hours worked)



Employee and contractor safety and health

1 Ensuring the safety and health of our people

and 0.48 to contractors). This represents a 23% decrease compared with our 2015 baseline of 0.76. This continuous improvement is attributed to a number of focus areas, including the Top Risks approach, trainings for various levels of the organisation and engagement with contractor companies.

Two of our main focus areas are moving and rotating machinery and workplace transport to reduce fatal and life-altering injuries. In 2020, we had no fatal or life-altering injuries related to these focus areas.

Contractor companies experienced both of our fatal injuries in 2020. We continue to deepen our engagement with them – especially during large projects and the annual shuts to eliminate fatalities and serious injuries from our business.

Embedding a 24-hour safety mindset

We continue to embed our '24-hour safety mindset' approach as something we do for ourselves, for our families and for our colleagues and their families. The concept is designed to tap into people's awareness on an emotional, conscious and unconscious level by applying safety to all aspects of our lives – not just to work. It is based on the premise that there is no difference between being safe at work or at home, the outcome is the same. And that, if we develop our habits so that safety becomes an unconscious behaviour, we will ensure our own safety and that of those around us.

Certification and management systems

The safety and health of all our employees and contractors is covered by our management system, which includes our safety and health policy, Practice Notes, methodologies and initiatives. These systems are implemented based on recognised risk management standards and guidelines, including OHSAS 18001, ISO 45001 and the National Occupational Safety Association (NOSA).

Our operations and equipment are subject to ongoing internal and external audits, designed to identify strengths and weaknesses and to guide necessary changes and improvements. Regular audits of plant and equipment standards help drive improvements in process controls and systems.

92% of our mills (12 of 13) and 72% of our converting operations (60 of 83) have OHSAS 18001, ISO 45001 or an equivalent safety certificate (NOSA)² system in place.

Risk-based approach

Risk assessment is central to our approach. It enables us to identify hazards and put necessary control measures in place. We provide training to ensure teams understand and align with the requirements of our methodologies.

Operations are required to consider the top three risk controls – elimination, substitution and engineering – before looking at administrative controls or issuing personal protective equipment. Employees are engaged during the risk assessment processes and assessments are revised at predefined frequencies, when changes are implemented or because of an incident.

In 2020, we maintained our 'Top Risks' approach. For the eighth year in a row, each operation identified their top risks and developed management plans to engineer them out of the business. Where this was not feasible or possible, they introduced robust controls and procedures to reduce the risks. Some actions had to be postponed due to implications related to COVID-19 and will be followed up when possible to do so.

Our 'Nine Safety Rules to Live By' address hazards that pose a risk of high-consequence injury: working at heights; mobile plant; handling chemicals; confined spaces; working in forests; permit to work activities;

lifting activities; energy and machinery isolation; and moving and rotating equipment.

The Rules are supported by Practice Notes and methodologies to ensure a practical and easy-to-understand approach. They include: task risk management; permit to work; chemical handling; safe operation of paper machines (see case study on page 27); and contractor safety management.

In 2020, we continued separate working groups, each chaired by members of the senior Safety and Health network team, to develop or update Practice Notes for selected high-risk topics, including:

- Responding to pandemics (including COVID-19)
- The social psychology of risk engagement and communication

- Visitor inductions
- Preventing noise-induced hearing loss
- Manual interaction with moving and rotating parts in converting operations
- Safe handling of bleaching chemicals
- Safe lime handling
- Safe handling of doctor blades for printing and paper machines
- Mondi Incident Cause Evaluation.

Additional focus topics will be selected and working groups established to address them in 2021. We are rolling out the new engagement board tool at all sites (see case study below). COVID-19 restrictions resulted in a slower roll-out than was planned and will continue over the coming years.

Together we are...
creating tools to support our leaders and employees

We're constantly developing new tools to help our first-line managers engage with their teams to develop their conscious and unconscious safety mindset. The new engagement board process is designed to help our leaders to engage with employees and contractors with a focus on three social psychology of risk elements – Workspace, Headspace and Groupspace. We've created icons for each of these elements which will be used in all future safety and health related materials. We've also created two packs of cards to help employees understand the language we use. Originally developed for safety and health, we have had positive feedback from sites on improved engagement and the tool has been rolled out to other disciplines such as projects, environment and engineering.

Brian Darlington, Group Head of Safety and Health

[Read more in our case study online](#)



Employee and contractor safety and health

1 Ensuring the safety and health of our people

Together we are... ensuring safe operation of our paper machines

We have robust controls in place to ensure safe operations of paper machines, which is a high-risk area. We identified the need for a more standardised approach to safe paper machine operations across the Group, to leverage good practices and learnings. Since 2014, the Group has had a proactive working group to determine existing controls and best practices and develop standards, in the form of Practice Notes, for the safe operation of each paper machine section.

Read more in our case study online



Incident investigations

Our formal incident investigation methodology (MICE) guides the reporting and investigation of all incidents, including major close calls and injuries. We assess and monitor key trends in incident categories, including types of injuries, contractors and employees, and experience of employees. Our employees and contractors have the right to refuse to work should their safety and/or health be compromised. They are protected against reprisals through SpeakOut, our confidential hotline for reporting grievances and whistleblowing (see page 91). We are revising our investigation methodology to include contributing psychological and cultural factors. The new approach was successfully used to investigate the two fatal incidents in 2020. All senior SHE professionals attended the relevant training and are involved in the revision of the methodology, which will be rolled out across Mondi in 2021.

Measuring progress – lead, current and lag indicators

Conventional safety performance metrics focus on incidents and total recordable case rate (TRCR), known as ‘lag’ indicators. We also use ‘current’ and ‘lead’ indicators to monitor proactive efforts and improvements aimed at preventing incidents.³ Performance against lag, current and lead indicators form part of our senior managers’ bonus scheme. Our lead and lag indicators are revised annually, based on performance in the previous year and other trends and concerns.

In 2020, we carried out 96,943 safety audits against a target of 65,095. They included management risk-focused audits, first-line manager task audits,

SHE professional focus audits and peer observations. More than 98% of resulting actions were completed. In addition to 218,187 hours of general safety training, we conducted 42,207 hours of critical safety training against a target of 24,359 hours.

Working with contractors

Our contractors are employed by companies with varying safety and health standards and cultures. We support them to manage safety and health risks and align with Mondi requirements. Using a risk-based approach, we appoint contract managers who facilitate liaison between contractors and the Mondi team. They work with Mondi SHE professionals and contracting companies to provide information and guidance, monitor contractor safety performance and support contractors to close gaps and improve practices. We have defined a six-step process in a Practice Note to guide integration of safety and health requirements into contractor management activities.

Safe maintenance shuts and other projects

Our mills are subject to scheduled annual shuts during which machinery and equipment is maintained, replaced or upgraded. Other complex and large projects also involve non-routine work, with many employees and contractors working on-site at the same time. Some of our highest risk activities occur during these times. We manage the risks in a number of ways, including:

- ensuring Mondi site managers and SHE professionals maintain a visible presence and provide on-site support, including at key meetings;
- engaging with contracting companies to align activities and agree common standards of work;

- conducting pre-shut risk assessments to identify high-risk activities and implement management controls;
- engaging with SHE leaders of larger suppliers and conducting joint site visits with a focus on safety and health; and
- acknowledging contractor companies for good safety performance.

Annual shuts and major projects in 2020 saw between 150 and 4,050 contractors working on-site at any one time. Overall, we achieved a good shut performance with only 11 recordable cases and zero serious injuries during almost 2.2 million hours worked by over 13,800 contractors.

Safety and Health resources and governance

Chaired by the Group Head of Safety and Health, the senior Safety and Health network team meets quarterly to address issues and align efforts on the Safety and Health Strategic 2019–2021 Plan approved by the Executive Committee in 2019. Business unit and business segment safety and health professionals meet with safety and health professionals from operations to facilitate the cascading of information, alignment across sites and employee participation and consultation. Site-level committees oversee local performance, assess incidents and support departments to ensure continuous improvement as well as to raise issues of concern or grievances related to safety and health. Each operation has also employed a dedicated person responsible for safety and health, who is required to attend specific trainings to ensure alignment.



Employee and contractor safety and health

1 Ensuring the safety and health of our people

Training

Our training and skills development programmes cover all aspects of safety and health, including: safety management; risk assessment; individual competency and skills; policies; methodologies and procedures; incident investigation; and auditing techniques. Training is offered in a range of formats, from formal to on-the-job training to toolbox talks.

All safety and health colleagues are required to complete the dedicated programme for safety and health professionals by 2022. It consists of

five modules spanning 12 days of training and attendees submit a post-training project as part of a final evaluation. 89 people have now attended the fifth module of the programme. At the end of 2020, 1,566 people had attended the three-day first-line managers training programme. Over the next two years, all safety and health colleagues will complete the Module Five training programme for SHE professionals. Roll out of Module Six of the programme, covering our new focus on social psychology of risk, will commence in 2022.

Supporting health and wellbeing

2020 was a unique year for our people as they adapted to new ways of working as a result of the pandemic. We have increased our focus on supporting our employees' emotional wellbeing and that of their families.

Our occupational health programmes are designed to eliminate risks to health, prevent occupational illnesses and diseases, and provide a healthy working environment for people working for Mondi. This includes optimising ergonomics, providing regular health screening, reducing noise impact and conducting occupational health hygiene surveys. We developed action plans to manage these risks using a hierarchy of controls approach, e.g. reducing the noise before issuing hearing protection. In 2020, we introduced a home office guide, which covers topics including mental wellbeing and ergonomics.

Our Employee Assistance Programme (EAP) is a 100% confidential telephone hotline provided by an external company of qualified counsellors and advisers, which operates in 14 countries. It can be used by Mondi employees and their families free of charge and around the clock, 24/7/365. Qualified counsellors offer support on a wide variety of topics, such as stress, mental health and addiction.

Together we are... keeping people safe during annual maintenance shuts and large projects

Annual maintenance shuts and large investment projects are of a high-risk nature and we work to ensure they are conducted safely and do not create risk of injury for our people. Our Practice Note for contractor safety management involves a six-step process and all project work is fully aligned with it. SHE professionals across the Group are trained on the fundamentals of contractor safety management, with additional training courses for our project managers.

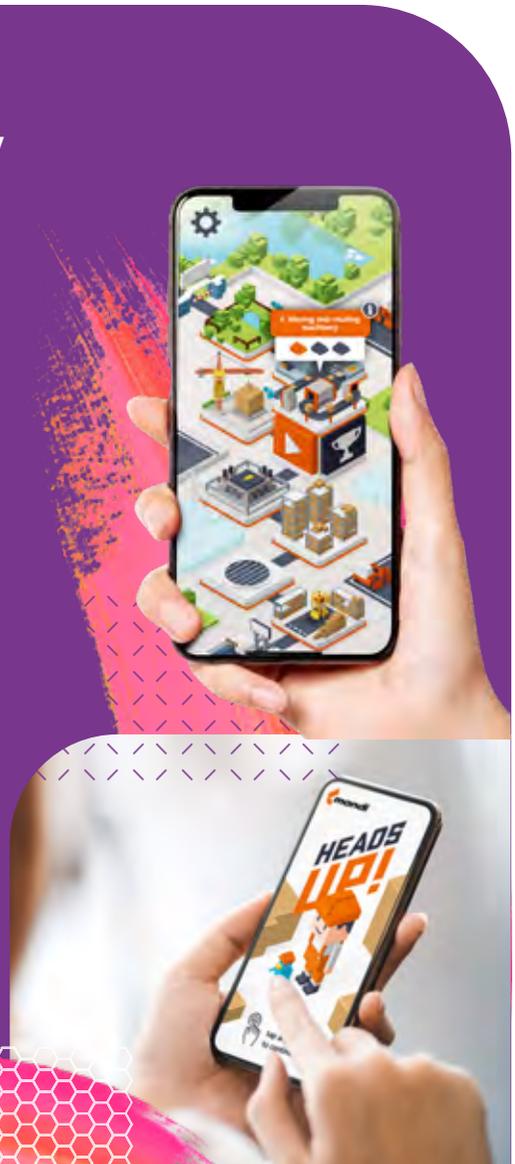
Read more in our case study online

Together we are... using gamification for safety

Our Corrugated Solutions business segment has introduced a new form of communication about Mondi's 'Nine Safety Rules to Live By' through launching the HEADS UP! game app in July 2020. The game aims to build knowledge and understanding of the nine safety rules through a psychological influencing technique, called priming. Priming involves exposure to something which evokes a conscious and unconscious reaction or response. A repetition of that exposure helps the brain process the situation much faster in similar future occurrences. HEADS UP! uses this technique to establish memory of safe behaviour at the workplace. Gamers develop this memory by having to continuously repeat a safe behaviour in the game in order to pass each level.

The game is available as a free download from the Apple App Store or Google Play Store. Unique identity codes make it possible for Mondi employees to take part in the internal competitions, which other business units have started to roll out. The global roll out within Mondi will be completed in 2021.

Sabine Nellen, SHE Coordinator, Corrugated Solutions





Employee and contractor safety and health

1 Ensuring the safety and health of our people

In 2020, we responded quickly to safeguard our people against COVID-19. One example was that our Safety and Health and Procurement teams worked together to supply one million masks and other PPE to front-line employees quickly and safely so that people could operate safely and efficiently with the right protection during the pandemic (see the case study on page 69).

Other initiatives to promote health and wellbeing include:

- Mobile clinics provide medical services for all contractor employees working for our South African forestry operations.
- On-site health and wellbeing facilities, such as our healthcare centre at Syktyvkar (Russia) and fitness centre at Frantschach (Austria), and health monitoring services offered by many operations.
- Wellness programmes at several locations, for example the Štětí (Czech Republic) 'Mondi for Life' initiative, which promotes sports, health and recreation.
- Independent on-site medical clinics and/or doctors at some of our mills, and service providers/private medical practitioners to offer occupational health services at other locations.
- Due to the remoteness of some of our forestry operations, we continue to support our contractor employees in the South African forestry operations and have now included support for COVID-19 related issues, for example through mobile clinics.
- Occupational health programmes are in place at all our operations, which include focus on items such as hearing protection, occupational asthma, ergonomics and surveys of the working conditions in the plants.



2,951

employees and contractors participated in the HIV/AIDS voluntary programme in our South African operations

Together, we are... supporting the mental health of our people

Across the Group, supporting employees as they adapt and respond to the uncertainty and impacts of the COVID-19 pandemic has been a top priority. Our Employee Assistance Programme (EAP) has proven highly valuable in supporting people's mental wellbeing. Our EAP partners have hosted webinars with managers and employees to promote mental and physical health during the pandemic. We have focused on key topics raised in counselling – including anxiety and anxiety disorders, the burden of balancing home office with childcare and home-schooling responsibilities

and crisis interventions for expat employees. We've put measures in place to address these issues and ramped up promotion of the EAP to encourage more people to use it. We surveyed production employees to monitor their mental wellbeing, using what we learnt to put specific measures in place for them. These included virtual meetings on key topics for employees and their families (such as dealing with change and uncertainty, stress management, etc.) and more flexible working options and shift planning to accommodate individual needs.



We also raise awareness of diseases such as HIV/AIDS, diabetes and tuberculosis among the people who work for us. We encourage testing, counselling and treatment for employees and contractors and offer advice to avoid onward infection. At our South African operations, we facilitate access to free voluntary counselling and testing (VCT) and anti-retroviral treatment (ART). Our peer support programme trains employee and contractor representatives to engage with and train the workforce on health issues.

In 2020, 2,951 employees and contractors participated in the HIV/AIDS voluntary programme in our South African operations (2019: 3,269), with 1,532 opting for testing.



2 A skilled and committed workforce

Grow. Create. Inspire. Together. This forms the foundation of our culture. With around 26,000 people working in more than 30 countries, we need to inspire a global workforce that's ready for change and embraces new ways of doing things. We aspire to be an employer of choice by engaging and developing all our people.

Why is this important?

Meaningful employment is one of our main contributions to society. Our employees want purposeful careers and everyone who works at Mondi contributes to our sustainability. We depend on developing a talented and agile workforce to lead and innovate against the backdrop of evolving workplaces, emerging technology, new business models and COVID-19.

What's our impact?

Our Global Employee Survey has enabled us to monitor the engagement of our employees with our business, culture and purpose. Consistently high global response rates¹ show that our people are willing to engage and participate in improving our culture and working conditions. Key themes that have dominated include feedback and recognition, enhancing our people's pride to work for Mondi, collaboration and communication, along with a trend to become more inclusive.

We have made important strides in all areas – increasing the coverage of personal development review processes and development schemes, and extending 360° feedback to more employees. Recognition is increasingly embedded in our culture, as evidenced by the You Make Mondi scheme.

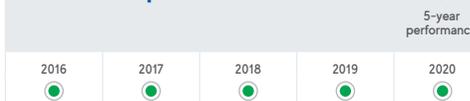
Communication initiatives, including virtual colleague conversations and regular personal video messages from our leaders, point to a more

connected workplace. The introduction and roll out of the Employee Assistance Programme (EAP) and other initiatives have brought wellbeing and mental health to the fore.

A key challenge that remains is the lack of full visibility of the barriers and drivers impacting our people and culture, due to insufficient data. We need to focus more on measuring the impact of our initiatives to understand whether they achieve the right outcomes.

Our commitment to 2020

Engage with our people to create a better workplace



Our strategic SDGs and targets



SDG 8 Decent work and economic growth
– **Target 8.6** Substantially reduce the proportion of youth not in employment, education or training



SDG 9 Industry, innovation and infrastructure
– **Target 9.2** Promote inclusive and sustainable industrialisation and significantly raise our industry's share of employment and gross domestic product

For links to all other SDGs, see the full [SDG Index](#)

What's next?

With the launch of our new MAP2030 commitments, we aim to build skills that support long-term employability and more widely enable our employees to participate in upskilling programmes. We will continue to develop our global remote working policy and have planned to roll it out across all operations in 2021.



Together we are...
inspiring and helping our people grow



A skilled and committed workforce

2 Engaging our people

We understand the ingenuity of our people is key to unlocking our potential. That is why employee engagement is integral to our culture as we work together to create an inspiring workplace where people feel valued and included. Our response to COVID-19 focused on keeping our people informed, engaged and working effectively while supporting their physical and mental wellbeing.

'Inspire' – the Mondi way

The key values of performance, care and integrity underpin our cultural development programme, 'Inspire'. They are also the values that guide our business decisions and the behaviours of our employees. 'Inspire' is the lens through which we review and develop our HR processes, employee engagement and talent development.

Listening to our employees

Conducted every two years, our Group-wide employee survey enables us to understand employee views and consider them in our strategy and decision-making. The most recent survey took place in March 2020 with an 88% overall response rate – a significant achievement considering that we changed to a fully digital format in 2020 and in light of the impact of COVID-19.

The results showed a significant overall improvement since the previous survey in 2018. Overall favourable responses increased from 75% to 80%. Results improved compared with

the 2015 and 2018 surveys across all 'Inspire' categories (integrity, passion for performance, responsible, dynamic, respectful, empowered, transparent, caring and entrepreneurial). We also saw consistent improvement across safety, sustainable engagement and retention and we outperform the majority of manufacturing industry averages (according to benchmarks conducted by our survey partner, Willis Towers Watson). Scores significantly improved in the respectful, empowered, transparent and caring categories – demonstrating the value of our continuous focus on developing our culture.

Areas highlighted for improvement include the emotional connection of our employees to the company, to ensure we all feel proud to work for Mondi and have a sense of purpose. We have improved in giving feedback and rewarding hard work. One example is our employee recognition scheme, 'You make Mondi', which was rolled out successfully across the Group. Collaboration between teams is also an area for continued focus; while quality of cooperation within departments received top scores, quality support from other departments is perceived as low, despite some improvements.

For the first time, we included a set of questions to evaluate our approach towards improving diversity and inclusion (D&I). These received a 79% favourable response rate.

As with previous surveys, we will use the 2020 survey results to deliver concrete improvement actions across the business and we will report on these in our next report.

Together we are... exploring the possibilities of flexible working for more employees

Some of the biggest impacts of the pandemic have been the changes to the way we work and collaborate together. With many employees working remotely, we've been able to test the cultural and practical possibilities of applying a more flexible work model at Mondi for the first time.

Flexible working isn't just about location – it's also about when we work, and how much we work. It can mean working outside of traditional workdays and hours or working less to help balance family and personal commitments. While we have embraced the concept of flexible working for a limited scope of employees and departments for a number of years, there are operational, tax and legal implications to be considered before we increase its scope and scale.

To do just that, in 2020 we set up a taskforce on flexible working made up of colleagues from different countries and functions. Its aim was to create a sustainable framework for providing more flexible working opportunities across Mondi by exploring what we can learn from the current situation and to shape our global approach moving forward. In the first project phase, the focus was on a global policy for remote working. It provides a definition of remote work, including tasks and finding the right balance between remote and onsite work. It also provides detail on places for remote work, working time and availability, and IT equipment and infrastructure considerations. Crucially, the policy is supported by guidelines on remote workplace safety to ensure that working from home and other locations does not compromise our high standards for the safety and wellbeing of employees. Currently, the taskforce is working on country appendices to reflect national jurisdictions and on the timing aspects of flexible working, such as flexible hours, sabbaticals and leave of absence.

Global employee survey, total favourable scores



Employee survey 2020 at a glance





A skilled and committed workforce

2 Engaging our people

Pulse check surveys

We use pulse check surveys to track specific actions and understand issues at our larger mills and other locations. During 2020, pulse check surveys were run in Vienna and Addlestone Group offices, Neusiedler mill (Austria), Hilm (Austria), Grünburg (Austria), Korneuburg (Austria) and in our South African operations.

Integration surveys

We carry out integration surveys of newly acquired businesses to gather feedback on the integration process and strengthen engagement. Surveys are conducted by an external partner and all employees and the central integration project team are invited to participate. While no surveys were conducted in 2020, we plan to carry out one at our paper bags plant in Cartagena (Colombia), which opened in early 2021.

Onboarding surveys

We ran onboarding surveys at five operations in 2019 to learn from new hires about their onboarding experience and improve our processes as part of our ambition to provide a positive employee experience from the outset. The insights gained have informed the development of a new onboarding framework, which was made available to the operations in December 2020. It provides our employees with a series of positive experiences by putting the individual first and at the heart of every step, all to help our new Mondi colleagues integrate more quickly and easily.

We use 360° feedback tools to enable people to understand their behaviours and areas for improvement:

- Senior managers and line managers with at least three direct reports receive anonymous 360° feedback every three years
- New leaders receive 360° feedback around six to eight months after appointment, with the focus on behaviours, understanding of the business and engagement with employees
- Other employees can access regular 360° feedback; around 355 employees received 360° feedback in 2020 (2019: 803)
- 360° Safety, Health and Environment (SHE) professionals feedback specifically looks at the safety performance of first-line managers. We didn't provide this during 2020 due to the challenges brought on by the pandemic
- FlexiFeedback allows managers and employees to select questions and receive feedback in a quick and flexible way to foster an open feedback culture that promotes continuous personal development
- We also use 360° feedback to evaluate D&I aspects, such as respect for diversity, communication with diverse audiences and adaptation to cultural norms in host countries for internationally mobile employees

Together we are...
keeping our
people safe and
our mills running

As the world was thrust into crisis at the beginning of the year, we had to adapt quickly to keep operations running and enable people to manage their personal priorities. This example from our Ružomberok mill (Slovakia) represents the common measures put in place across our global operations to keep people safe and manage the needs of the business and our customers. Reassuring production employees that it was safe to come to work and putting measures in place to protect their safety and their livelihoods was vital. We changed the team rotation and shift models to reduce physical interactions between people. Admin and office-based employees – some 27% of the mill's 1,500 employees – were asked to work remotely where possible, while management stayed on site to support operations and demonstrate visual leadership. Many of our production workers agreed to work more flexibly and we are truly grateful for the commitment they showed. To help, we made shift start and end times flexible and supplied packed meals so they could have access to nutritious food. We also set up dedicated quarantine areas where employees with symptoms could be isolated and tested, along with an emergency hotline to connect people to a local physician. For 150 'critical positions', we set up weekly testing and contact tracing to give people confidence that they could come to work while being protected as much as possible.



Making a Difference Day

Making a Difference Day 365 (MADD) is our annual group-wide event that engages people to take personal action and to improve our safety, health and sustainability performance. Having celebrated 10 years of MADD in 2019, the 2020 events were not possible due to COVID-19 related restrictions on public gatherings and travel. Instead, the focus of engagement across our operations turned to tackling urgent health and safety priorities in the spirit of people joining forces and taking responsibility for themselves and others.

Transparency, assessment and feedback

Annual and mid-year Performance and Development Reviews (PDRs) enable employees and their managers to reflect on individual performance and set personal development goals. The PDR process covers all office employees and production employees with a leadership role, including team leaders, plant foremen and shift leaders. In 2020, around 8,400 employees were registered for a PDR process in our system (2019: 9,000) with approximately 7,980 completing their PDR using our online system (2019: 5,900)².

We use external independent assessment to inform employees' development, strengthen our culture and support succession planning. They focus on the strategic skills needed to move up the organisational structure and help us identify the right fit for each employee and position.



A skilled and committed workforce

2 Training and developing our people

Technology makes us efficient, but our people make us smart. We invest in life-long learning, supported by coaching and mentoring, to develop our employees. Enhancing the skills of our people enables them to realise their potential and our business to succeed. In 2020, the pandemic presented new challenges and much of our training went digital.

We create targeted programmes to help employees acquire and develop skills so that we can meet our strategic targets. Our employee induction includes training related to the business, how we create value, our products and our approach to sustainable development. Performance and career development reviews support the personal growth of employees and contribute to skills management and the development of human capital within Mondi. For those facing retirement, confidence and quality of work relations is improved by the knowledge that they are supported in their transition from work to retirement.

Digital learning

In step with Mondi's digital transformation, we are enabling flexible learning when and where our employees need it. This new way of learning is tailored to the needs of employees and the business, particularly given the necessity of remote learning brought on by the pandemic. To support the individual learning journey of each employee, we provide diverse learning opportunities, which are continually refined based on business needs, employee feedback, best-practice and new technologies.

The Mondi Academy

The Mondi Academy is our global learning hub which provides business-related training. It comprises a Group-wide training network, including several local academies (currently in Czech Republic, Poland, Russia, Slovakia and South Africa). The Mondi Academy develops customised programmes for leaders, line managers and employees with the emphasis on global topics and leadership.

The Mondi Academy increasingly provides digital learning tools through the Learning Management System, which provides e-learning content for Mondi employees globally. The Mondi Academy International adjusted all in-person Academy training sessions to online formats in 2020, with the exception of local team trainings that were possible to conduct safely on site. We will resume face-to-face trainings when it becomes safe to do so.

New online workshops launched this year include:

- Digital Training – a 'Train the Digital Trainer' concept designed to boost employee skills to conduct and host digital workshops and meetings;
- Work smarter, not harder – training to support employees to work more efficiently on projects and tasks; and
- DigiLog Working – supporting a new way of working, which combines analogue and digital teams and approaches.

The Mondi Academy International, based in Vienna, conducted 136 seminars and programmes in 2020 (2019: 135), with a 53% women participation rate.

We have designed specific training to empower employees and support diversity, particularly gender diversity (see [page 39](#)). Employees in sales and marketing roles, and others that may come into contact with competitors, annually complete competition compliance training, which also covers Group organisational policies and business integrity. We extended this training last year to include sustainability policies, with special emphasis on our Labour and Human Rights Policy.



“Training plays a crucial role in building the skills that Mondi needs to prepare for the future of work. The pandemic increased the need for remote learning this year, so we adapted many of our programmes to digital formats. It's been a great success.”

Michael Hakes
Group HR Director



A skilled and committed workforce

2 Training and developing our people

Developing leaders from within

We focus on developing high performing and mobile employees, many of whom have worked for us in different geographical and cultural contexts. We enhance their leadership skills through dedicated development centres. The development centres planned for 2020 were postponed to 2021 due to the pandemic. We also offer behavioural assessments for managers, employees and our salesforce to tailor their personal development to best meet their individual character and needs.

Employees completed

617,470

hours of training in 2020

Conscious inclusion training

We introduced 'Conscious inclusion' training in 2019 to support our D&I ambitions and it became part of our standard offering in 2020. It is designed to enable employees and management to become more mindful of their unconscious perspectives and biases and to equip them with practical actions they can take to support a more inclusive workplace. The training was completed by 10 teams during 2020, involving 97 employees (37% women).

Mentoring and coaching

Our mentoring programme connects senior managers and cultural role models with more junior employees to facilitate knowledge and experience sharing across managerial, technical and cultural topics. Mentoring boosts professional and internal networks and is important to the development and career progression of both mentees and mentors. It is available to all employees in management and leadership roles and additional employee groups. Mentors receive regular training to improve their mentoring skills and we are working to promote the value of mentoring. We also offer coaching to develop people's interpersonal, cultural and work/life balance skills and to support people in adapting to new roles, work environments and challenges. Our coaching programme is delivered by a network of internal and external coaches.

Reverse mentoring

We launched a 'reverse mentoring' programme in 2019, pairing 11 early-career employees with 11 senior managers for the pilot run of the programme, which was concluded in October 2020. Reverse mentoring exposes senior managers to employees outside of their usual circles so they can better understand the challenges they may face, the unique value they bring and what they expect from leaders. For the less experienced employees, exposure to experienced leaders brings first-hand understanding of leadership, communication and digital transformation, among other topics. Reverse mentoring enables the sharing of different individual approaches in a trustful and confidential atmosphere, fostering inclusion and cross-generational camaraderie, improving professional and personal networks and providing positive role models within the company. We are considering reverse mentoring as part of our standard people development offering in future.



Coverage of safety in training hours (%)



	Mondi Academy International	Local academies				
		Russia	Slovakia	Czech Republic	Poland	South Africa
Total employees attending training	1,270	3,527	5,972	3,666	124	1,206
% women	53	30	12	20	62	21

Group-wide training

Including new acquisitions

	2020	2019
Employee and contractor time devoted to training and development	617,470	801,900
Average training per employee per year	24 hours	31 hours
Relevant employees completing competition compliance training	773	3,096



3 Fairness and diversity in the workplace

We believe in the ingenuity of our people to drive innovation and meet our stakeholders' evolving needs. Increasing diversity and respecting human rights is central to our approach. We're committed to providing a fair and inclusive workplace that secures good working conditions and labour rights.

Why is this important?

A diverse workforce thinks more creatively and enables us to respond to local contexts and needs, particularly the needs of our diverse customer base. We depend on a strong pipeline of people from all backgrounds to grow and succeed. By acting with integrity, we reduce our risks and those of our business partners, improve employee engagement and enhance our reputation.

What's our impact?

Two key aspects have been central to our ambition to develop a fairer, more diverse workplace: increasing the representation of women at all levels; and putting in place a framework to understand and address our human rights risks and impacts.

The launch of our D&I taskforce and the D&I Steering Committee in 2018 established leadership and business engagement across the Group. The taskforce has implemented cultural, educational and process-related initiatives to improve performance.

While our policies and processes enable and encourage gender equality, we acknowledge that we need to do more to ensure that women are hired, paid, retained and advanced fairly and equitably across the entire Group. Our focus on inclusion equally aims to encourage diversity of all types.

Human rights topics have evolved into a material business issue in recent years and we have worked together internally and with external experts, such as the Danish Institute for Human Rights, to understand our gaps and develop our approach.

Our commitment to 2020

Promote fair working conditions and diversity in the workplace



5-year performance



Our strategic SDGs and targets



SDG 8 Decent work and economic growth

- Target 8.5 Achieve full and productive employment and decent work for all women and men, and equal pay for work of equal value
- Target 8.7 Eradicate forced labour, end modern slavery and human trafficking and eliminate the worst forms of child labour
- Target 8.8 Protect labour rights and promote safe and secure working environments for all workers

For links to all other SDGs, see the full [SDG Index](#)

What's next?

As outlined in our new MAP2030, we aim to provide purposeful employment for all, in a diverse and inclusive workplace. We will work towards a score of 90% for inclusiveness in our employee survey and to employ 30% women across Mondi (21% in 2020). In 2021, we will further develop our human rights due diligence approach and continue to work on understanding and addressing our impacts.

Together we are...
creating an inclusive workplace and respecting human rights





Fairness and diversity in the workplace

3 Upholding employment and human rights

Equality, employment and human rights issues are central to the public debate on how business interacts with society. Compliance with the law, respect for human rights beyond compliance, and being a fair employer are foundations of our employment practices. We adhere to internationally recognised standards, work in partnership with others and develop control mechanisms to embed our global approach.

Respecting human rights

The United Nations (UN) Guiding Principles on Business and Human Rights provide an effective framework to strengthen our monitoring and reporting of potential human rights risks. We have taken initial steps to develop a human rights impact assessment and due diligence process for our own operations, and have embedded labour and human rights criteria in our procurement processes and policies.

We respect the rights of indigenous people – including communities in our forestry operations in Komi (Russia) and in South Africa (see [page 73](#)).

We report annually at Advanced Level on our compliance with the 10 principles of the United Nations Global Compact (UNGC).

[View our Communication on Progress online](#)

Human rights impacts in our industry may occur in several ways, including: worker safety and health; recruitment and employment practices; product

safety; air or water pollution; use of forced or child labour; discrimination; misuse of employee and customer data; use of force by security personnel; disregard for land tenure and indigenous rights; impacting the living conditions of communities; contamination, inequitable use or depletion of resources relied on by communities.

The purpose of our management approach is to support our operations in identifying and mitigating potential human rights risks in their operations and supply chain. We have embedded respect for human rights in many of our practices, including: safety and health; fair treatment of employees; respect for the law; engaging and investing in communities; minimising our environmental footprint; producing products to the highest safety, health and hygiene standards; and working with suppliers and contractors to meet high standards of business conduct (see [page 70](#)).

There were no reports of human rights incidents in our operations or supply chain through any of our reporting mechanisms in 2020, and we recognise that we need to improve our reporting and grievance mechanisms to enable them to identify potential incidents in future.

Strengthening our human rights due diligence

In 2020, we took initial steps in preparation for a new human rights due diligence process with the support of the Danish Institute for Human Rights (DIHR). The process was informed by a detailed human rights risk and gap analysis, including interviews with Mondi’s relevant functions and business leaders, a desktop review of our systems and practices to understand potential gaps and an assessment of countries where we may face risk due to divergence between international human rights and labour standards and national law.

The following is a summary of DIHR’s recommendations:

Policies:

- Enhance alignment of our Labour and Human Rights Policy with the International Labour Organization’s (ILO’s) Core Conventions
- Ensure adherence to human rights standards in jurisdictions where the local law falls short of international human rights standards (we have developed a heat map for 23 countries of operation)
- Use of policy development and training (grounded in the UN Guiding Principles on Business and Human Rights) to establish a common understanding of human rights across Mondi

Procurement:

- Monitoring compliance with Mondi’s Supplier Code of Conduct and training suppliers
- Strengthen contractual obligations in supplier agreements for responding to our sustainability questionnaires and potential audits
- Ensuring that human rights risks are not limited to labour rights, and taking steps to map our supply chain beyond tier 1

Grievance mechanisms (SpeakOut):

- Improve messaging, consistency and accessibility of SpeakOut communication material
- Communicate more clearly that the user’s identity is protected and that we ensure they are safe from possible reprisals
- Align SpeakOut with the effectiveness criteria for grievance mechanisms as set out in Principle 31 of the UN Guiding Principles on Business and Human Rights



“As a global manufacturer in the packaging and paper industry involved in sourcing, manufacturing and recycling, Mondi has the potential to impact human rights across the value chain. Through a gap analysis conducted in 2020, we identified a number of areas on which Mondi should focus its efforts to identify and address its human rights impacts.”

Gabrielle Holly
Senior Adviser, Human Rights and Business Department, Danish Institute for Human Rights

Understanding and perception of human rights:

- Enhance employee and business functions’ understanding of the human rights issues Mondi faces, where it faces them and what is expected to address them through communication, training, policies and reporting

We will develop internal action plans to address the gaps and improve our human rights collaboration through development of training and communication.



Fairness and diversity in the workplace

3 Upholding employment and human rights

Compliance with labour and human rights

We aim to protect the safety, health and wellbeing of our employees, those working in our supply chain and local communities. As a minimum, we comply with all applicable laws and industry standards on working hours and strive to provide workplace flexibility and promote a healthy work-life balance.

Zero tolerance of child labour and forced and compulsory labour

Mondi does not tolerate any form of forced labour, child labour, slavery, human trafficking, physical punishment or other abuse and responsibility for implementing these principles lies with local line management.

We do not employ people below the age of 15 or below the local minimum employment/mandatory school age – whichever is higher and relevant to the particular country. Where we provide apprenticeships for young people, we put special protections in place and ensure they are not exposed to hazardous work¹.

For our measures to identify and tackle risk of modern slavery in our supply chain, see [page 70](#).

Enhancing wellbeing

Mental wellbeing and health is a material business issue that has increased in importance. There are rising expectations of employers to take an active role in supporting mental health. For Mondi, supporting our people to be well and feel well is also the right thing to do. We are developing our approach, and as a first step have rolled out our Employee Assistance Programme (EAP) and similar support systems globally.

EAP is a 100% confidential hotline provided by an external company of qualified counsellors and advisers. EAP is in place in 14 countries, as well as equivalent systems in two further countries (in total covering more than 80% of our employees). It can be used by Mondi employees and their families free of charge 24/7/365.

During the COVID-19 pandemic, the EAP proved valuable in supporting people’s mental wellbeing. Our EAP partners hosted webinars with managers and employees to promote mental and physical health – see the case study on [page 29](#).

Collective bargaining and freedom of association

Mondi respects the rights of its employees to form and join trade unions and take part in collective bargaining. We abide by legally binding collective agreements. An estimated 72% of our employees were covered by Collective Bargaining Agreements (CBAs) in 2020 (2019: 72%). We do not collect or report information on employee union membership due to differences in national legislation.

Fair remuneration

We provide fair wages and benefits that meet or exceed legal or industry minimum standards. Reward and recognition is based on performance and we offer performance-related pay schemes in which the majority of employees participate. Total compensation consists of base salary plus benefits and incentives. These are determined by global rules, local legislation, market practice, seniority and individual performance. The average ratio of basic salary and remuneration to variable pay across all employees in significant operations is 85%:15% and varies by operation (2019: 85:15).

	2020	2019
% employees who received a bonus of some kind ²	68%	66%

For our approach to executive and Board remuneration, please see our [2020 Integrated report](#) (pages 126-147).

At Mondi’s South African operations, annual wage negotiations take place via an industry bargaining forum. Following a deadlock in negotiations in 2020, the National Union leadership declared an industry-wide strike. Negotiations continued at a company level and, despite several revised wage offers at Mondi’s mills, unions elected to remain on strike. Following a mediation process, which assisted in reaching an agreement, employees returned to work.

Grievance mechanisms

We provide robust internal processes and tools to facilitate the reporting, investigation and resolution of grievances.

In 2020, we received 125 SpeakOut messages (2019: 162) relating to 74 cases (2019: 104), and 2 further cases through other channels (2019: 4). Topics included Human Resources-related concerns, business integrity issues, as well as environmental and safety topics. All SpeakOut messages were forwarded to the respective Mondi management team in accordance with our standard procedures. We responded and took appropriate corrective action for all issues.

As part of our collaboration with the DIHR in 2020 (see [page 36](#)), we evaluated our SpeakOut mechanism against Principle 31 of the UN Global Principles (UNGPs), and are working to address the gaps identified.

Restructuring, divestitures and closures

We carefully review decisions about business restructuring opportunities to ensure the long-term sustainability and growth of our business.

When employees are affected by organisational change, we follow our policies and local labour rules as a minimum. These cover consultation, notice periods, regular briefings and trade union involvement, where available. If roles are at risk, we support employees with retraining, re-employment and relocation. We also support entrepreneurship and provide severance payments, depending on local regulations.

We typically apply a minimum two-week notice period. For organisations with CBAs, the notice period and provisions for consultation and negotiation are specified in CBAs and/or by law.

In 2020, we ceased operations at our Deeside and Nelson consumer flexibles sites in the UK following a change in demand for the niche products produced there, resulting in around 200 redundancies.

We maintained constructive engagement with employee representatives and the recognised union, Unite, and supported employees throughout the phased closure of the sites. Due to the pandemic, it was not possible to offer the planned on-site, one-on-one support to employees through the Department for Work and Pensions and the Welsh and local governments. Instead, we provided necessary IT infrastructure to enable each employee to receive individual support remotely.



Fairness and diversity in the workplace

3 Diversity and equal opportunities

We work together to create an inclusive environment where differences are valued and embraced. Equal opportunity is a priority and we aim to engage, involve and inspire everyone who is part of Mondi. We have zero tolerance for discrimination and harassment.

Promoting diversity and inclusion

Our policy is to treat everyone fairly and with respect.

Opportunities for employment, engagement, promotion, training or any other benefit are based on skills and ability. We provide equal opportunities regardless of gender, race, age, sexual orientation or ethnicity.

Increasing the representation of women at all levels remains a priority in the traditionally male-dominated forest products and packaging industries. We became a signatory of the UN Women's Empowerment Principles in 2019 and committed to take action to promote its seven principles.³

Our D&I Policy, available on our website, reflects the Hampton-Alexander Review⁴ recommendation that Boards and Executive Committees and their direct reports should be 33% women by 2020. Refer to the following page for our reported statistics in 2020 (see next page for our reported statistics). The Policy includes a focus on ethnic and racial diversity across our Board and Executive Committee members and supports our Labour and Human Rights Policy.

Developments included:

- making it more inclusive with greater clarity on the diversity attributes we protect from discrimination;
- a commitment to support the improvement of D&I in our supply chain; and
- strengthening governance in relation to training, transparency and stakeholder inclusion.

We took a key step during 2020 when we set D&I targets as part of MAP2030 (see [page 20](#)).

D&I taskforce: embedding diversity

We launched our cross-business, cross-functional D&I taskforce in 2018 to help shape and embed our approach to D&I across the Group. In 2020, taskforce members worked with the business to shape a D&I vision and roadmap for 2030. Discussions focused on how we can build a culture where everyone feels safe and comfortable to speak their mind, and where discrimination has no place. The taskforce explored how to shape the leadership culture and composition to embody our D&I aspirations. Our new roadmap will help strengthen D&I at Mondi, covering concrete actions on strategic performance and management areas, including our policies and governance; leadership and culture; HR practices; training; tools, data and reporting; infrastructure; and transparency and external engagement. We are also collaborating with Female Factors, a global community striving to enhance careers of female leaders. This provides an opportunity to offer women across the Group, and across all levels, access to mentoring, networking and knowledge sharing.

Employee numbers in 2020 across our significant locations of operation⁵

	Significant locations (total)		Europe		Russia		South Africa		North America	
	Total	Female %	Total	Female %	Total	Female %	Total	Female %	Total	Female %
Total employees	17,262	21%	9,870	19%	5,074	24%	1,425	24%	893	16%
Permanent employees	16,142	21%	9,213	19%	4,726	24%	1,384	24%	819	16%
Temporary employees	998	24%	572	24%	348	25%	4	50%	74	14%
Full-time employees	16,869	20%	9,522	18%	5,074	24%	1,384	24%	889	16%
Part-time employees	387	62%	345	65%	0	0%	41	34%	1	100%
New employee hires	1,918	21%	949	18%	555	21%	150	36%	264	25%
Employee turnover	1,149	25%	699	22%	285	35%	66	20%	99	19%
Employees entitled to parental leave	3,323	28%	1,381	31%	135	81%	1,421	24%	386	16%
Employees who took parental leave	386	56%	258	47%	103	75%	14	100%	11	27%
Employees due to return from parental leave	306	43%	218	34%	80	66%	2	100%	6	50%
Employees who returned from parental leave	324	44%	223	34%	79	66%	12	100%	10	20%
Employees still employed after parental leave	306	40%	217	34%	70	50%	14	100%	5	0%

⁵ Our Group offices in London (UK) and Vienna (Austria), and plants/mills with more than €70 million annual sales turnover located in Austria, Bulgaria, Czech Republic, Finland, Germany, Hungary, Mexico, Poland, Russia, Slovakia, South Africa, Sweden, Turkey and the US

We updated the D&I Policy in 2020 and made it publicly available



Fairness and diversity in the workplace

3 Diversity and equal opportunities

At the end of 2020, 21% of employees were female (2019: 21%). There were two female directors (25%) on the Board and one director of colour.

During 2020, we reported to the Hampton-Alexander Review that as at 31 October 2020, we had 37.5% female representation on our Executive Committee and 28% in the direct reports to the Executive Committee, giving a combined total of 29%. As at 31 December 2020, following the appointment of Mike Powell as Group CFO in November 2020, female representation on our Executive Committee had reduced to 33%. However, the percentage of female direct reports to the Executive Committee had increased to 29%, maintaining a combined total of 29%.

At the end of 2020, 64% of Mondi South Africa's management team (seven out of 11 Operational Committee members) were individuals from previously disadvantaged backgrounds (2019: 64%, seven out of 11).

Most activities at Mondi are performed by our own employees and there are no significant variations in the numbers reported above during the year. The exceptions are harvesting activities at our forestry operations and maintenance shuts at our pulp and paper mills, which can involve considerable variations to contractor numbers. In 2020, we had an average of 14,539 contractors across the Group.

We aim to include employees from the local community in our senior management to enhance our positive market presence and economic benefit to the local community. It also helps us understand local needs and supports diversity of thought among our leadership.

Equal opportunities for employment and training for all

We consider applications for employment in a fair and balanced way. Our Labour and Human Rights Policy commits us to consistent and fair training, career development and promotion, including for those with disabilities. In the event of an employee suffering a life-altering injury at work, we facilitate appropriate medical treatment and rehabilitation. We also support their continued employment by finding alternative equivalent jobs where required.

Recruitment activities are aligned with the aims of our D&I Policy. This includes promoting diversity and ensuring fair and non-discriminatory work practices including for succession planning.

We invest in employment and training to develop a diverse and agile workforce, fit for the future. Talent development includes training modules such as 'Intercultural diversity and competence', designed to enhance the understanding of the benefits of diversity. Other initiatives include (reverse) mentoring, Conscious Inclusion and Global Leadership training and flexible working to support diversity at all levels and for all genders.

We design leadership and training programmes to promote gender diversity. 'Success management' supports career strategies for all genders and the 'Empower yourself' programme provides career support to women specifically. In some locations, we target training at young female employees to support them in planning their careers and balancing professional and personal goals. Examples include the Mondi Professional Women's Network in Austria, the Female Leadership Network in Poland, and the NexGen initiative within the corrugating packaging business.

We support all employees to fulfil their career ambitions during and after parental leave. We offer guidance, training and flexible working packages to help people return to their roles. Some operations also support or provide child day-care programmes and facilities, such as our Group office in Vienna and our Frantschach mill, which opened a new kindergarten in 2020.

At our Group office in Vienna, we have partnered with myAbility since 2018, a social business which brings together companies and people with disabilities to foster more inclusive workplaces. Through the myAbility talent programme, qualified students shadow our employees, raising awareness among Mondi employees and enabling the students to gain first-hand experience and contacts to help their future careers. This enriches the experience of the students and the shadowed employees, with our employees learning to become more inclusive in working with disabled colleagues. In 2020, we began to post job opportunities on the myAbility job platform to target a wide range of students and young professionals.





4 Sustainable fibre

We promote best practice in sustainable forestry management to help tackle the climate crisis. We consider social and environmental issues spanning the wood fibre supply chain. Our risk-based approach supports us to source wood and pulp from responsible sources. We are firmly committed to zero deforestation and no illegal logging.

Deforestation and illegal logging are ongoing issues which impact biodiversity and contribute around 12% of global greenhouse gas (GHG) emissions.¹ Demand for wood fibre as a renewable material is growing² and wood is one of our primary raw materials. Sustainable management of forests is crucial to secure their long-term value, halt deforestation and combat climate change.



What's our impact?

We have maintained 100% of our own forestry landholdings as Forest Stewardship Council™ (FSC™)-certified and 100% of procured wood fibre compliant with the FSC Controlled Wood standards. While our overall wood volumes have grown by almost 10% since 2015, the share of PEFC™- or FSC-certified wood has increased from 66% to 76% in 2020. Certified pulp increased from 81% in 2015 to 94% in 2020. In 2020, we saw an unusually high percentage of certified wood procured due to temporary increases in availability in our domestic markets.

As our approach has matured, we've moved from local due diligence systems based on our own company risk assessments to using independent national risk assessments, which underpin FSC Controlled Wood as our minimum requirement. Our Due Diligence Management System (DDMS) is focused on country-level risk to ensure legal compliance and mitigate sustainability issues.

We have continued to support international efforts to combat deforestation and forest degradation, particularly in the Southern Hemisphere where the risk is concentrated. This included our work with WWF's New Generation Plantations (NGP) platform and the promotion of the high conservation value

(HCV) principles and the Sustainable Working Forest concept.

In collaboration with WWF, FSC and local experts, we have helped make certification more accessible and fit-for-purpose in higher risk countries. As an international stakeholder member of PEFC, we have continued to support the development of the PEFC certification scheme.

Our commitments to 2020

Procure at least 70% of our wood from FSC- or PEFC-certified sources with the balance meeting our company minimum wood standard that complies with FSC's requirements for Controlled Wood



2016	2017	2018	2019	2020
Yellow circle	Green circle	Green circle	Green circle	Green circle

Maintain FSC certification for 100% of our owned and leased forest lands in South Africa and Russia and promote sustainable forest management



2016	2017	2018	2019	2020
Green circle				

Together we are...
building a sustainable global wood fibre supply chain

Our strategic SDGs and targets



SDG 12 Responsible consumption

- **Target 12.2** Achieve sustainable management and efficient use of natural resources



SDG 13 Climate action

- **Target 13.1** Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries
- **Target 13.2** Integrate climate change measures into national policies, strategies and planning
- **Target 13.3** Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning



SDG 15 Life on land

- **Target 15.2** Promote the sustainable management of all types of forests, halt deforestation, restore degraded forests and increase afforestation and reforestation globally
- **Target 15.5** Reduce the degradation of natural habitats, halt the loss of biodiversity and protect and prevent the extinction of threatened species

For links to all other SDGs, see the full [SDG Index](#)

What's next?

Our MAP2030 commitment is to maintain zero deforestation in our wood fibre supply, sourcing from healthy and resilient forests. We have set targets for 2025 to ensure 100% FSC certification in our managed forests and 100% responsibly sourced fibre with at least 75% FSC- or PEFC-certified, and the remainder being FSC Controlled Wood. We will also continue to develop and implement leading forestry practices in our own landholdings and beyond.



Sustainable fibre

4 Being transparent about our wood and pulp sourcing

We use wood fibre from responsibly managed forests to make our packaging and paper products. Wood fibre is a sustainable, renewable resource and we work with recognised credible certification and verification bodies to provide assurance that our wood and pulp is sourced responsibly and transparently. It is our clear business imperative, with consumers and customers driving demand for sustainable products.

The majority of the wood we source is roundwood and wood chips. Around one-quarter originates in our own managed forests in Russia and South Africa. We purchase the rest from external suppliers, mainly in central Europe. We also buy a small proportion of our wood fibre in the form of market pulp. For details on procured paper for recycling, please see [page 67](#).

We maintained 100% compliance with FSC, PEFC or FSC CW standards for all pulp and wood in 2020, ensuring the integrity and traceability of our fibre supply chain. We upheld 100% FSC certification for imports from high-risk countries and for our own forestry landholdings (excluding newly leased areas).

In 2020, we received approval to lease an additional 229,000 ha of forestry landholdings in Russia. 38,000 ha of this land was FSC- and PEFC-certified in 2020, 131,000 ha will be certified in 2021 and the remainder will be certified in 2022, once forest management plans have been put in place.

76%
of our sourced wood was PEFC- or FSC-certified

94%
of our sourced pulp was PEFC- or FSC-certified

100%
of our mills maintained PEFC and/or FSC Chain-of-Custody certifications



Certification status of our wood fibre

Types of wood fibre	Volumes 2020	Status 2020	Status 2019
Wood (roundwood, wood chips)	18.0 million m ³	76% compliant with FSC or PEFC	72% compliant with FSC or PEFC
Own forestry operations		100% certified to FSC and ISO 14001	100% certified to FSC and ISO 14001
Purchased wood		33% FSC 36% PEFC 31% FSC CW	32% FSC 33% PEFC 35% FSC CW
Market pulp	0.2 million tonnes	91% FSC 3% PEFC 6% FSC CW	93% FSC 6% PEFC 1% FSC CW

In 2016-2020, the average certified wood procured was 71% and for pulp it was 94%. In 2020, we saw an unusually high percentage of certified wood procured due to temporary increases in availability in domestic markets

Applying a risk-based approach to sourcing wood and pulp

The main threat to forests globally is their permanent loss at scale. The world's largest deforestation fronts are found predominantly in South America, south east Asia and central Africa.³ Our primary wood sourcing regions are in South Africa, north west Russia and Europe. Sourcing wood fibre in line with our DDMS supports us to ensure a deforestation-free supply chain.

We are committed to zero deforestation and no use of illegal or controversial wood fibre sources. We do not use tropical tree species, species listed by the Convention of International Trade on Endangered Species (CITES) or the Red List of International Union for Conservation of Nature (IUCN). We also do not use wood from genetically modified (GM) trees.

Beyond our direct supply chain, we support multi-stakeholder platforms to address the root causes of deforestation. We believe a key part of the solution to preventing deforestation is ensuring the long-term sustainable management of existing forests by securing their resilience and functionality as forests, while protecting areas of high value for biodiversity and ecosystems, livelihoods and communities.

We work in partnership with a broad range of stakeholders to address legality and sustainability risks in the wood fibre supply chain and to increase the availability and credibility of certified wood fibre.

[Read more about how we are addressing global challenges in the wood fibre supply chain](#)



Sustainable fibre

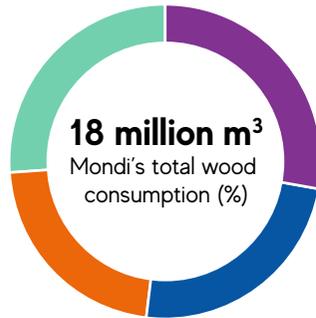
4 **Responsible sourcing is our priority**

We source more than 90% of our wood domestically from the countries where our mills are located

Certification provides important assurance

26% FSC™-certified wood purchased

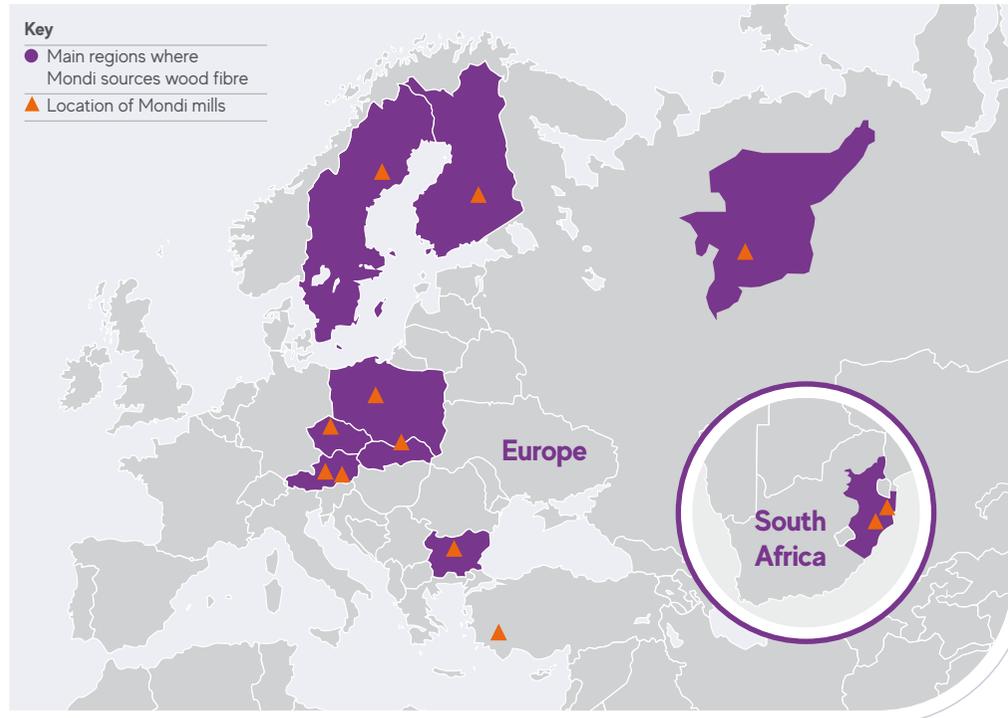
22% FSC-certified wood from our forests



28% PEFC™-certified wood purchased

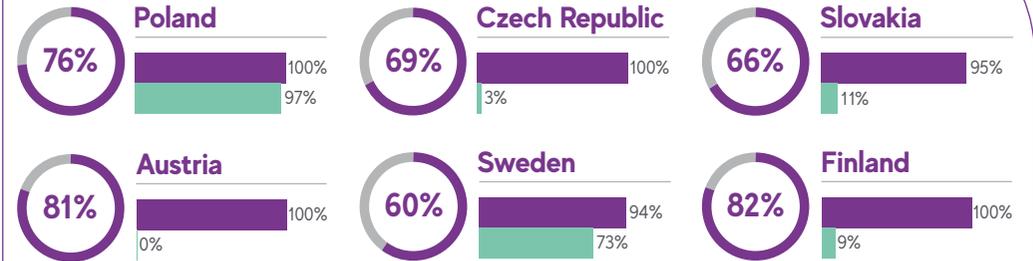
24% FSC Controlled Wood purchased

- Key**
- Main regions where Mondi sources wood fibre
 - ▲ Location of Mondi mills

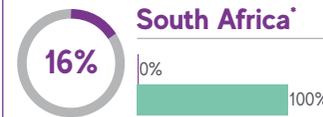


Total percentage of certified forests in our sourcing regions

Low risk countries



Medium risk countries



High risk countries



● % of PEFC-certified forest ● % of FSC-certified forest

* In South Africa, wood is sourced only from forest plantations, 80% of which are certified (DAFF, 2018)

Note: A sum of FSC% and PEFC% can be higher than 100%, because some forests are dually certified to both FSC and PEFC. Calculated based on FAO, FSC, PEFC (June 2018)

Together we are...managing risk country by country

We've been working with WWF since 2015 to explore how forest certification can be used to meet EU Timber Regulation (EUTR) requirements. We assessed the risk levels for different countries and defined stringent requirements for those countries deemed to be high risk. This work shows us that a robust Due Diligence Management System cannot be based on legal compliance alone – it must also address wider risks.

To support minimum legal compliance, country-risk classification and applicable assurance levels need to be supplemented by in-depth assessments, including external information sources, to ensure good decision-making in every sourcing country.

[Read more about our country-risk approach addressing legal and sustainability issues](#)



Sustainable fibre

4

Our Due Diligence Management System (DDMS)

Our DDMS is designed to address risks beyond legality and certification. While certification schemes cover a full range of sustainability issues, we go beyond the requirements of current assurance mechanisms by screening additional economic, social and environmental risks. For this, we use publicly available information and insights from local operations and partners.

We have been working with WWF to strengthen our DDMS and explore cross-cutting measures for the timely detection of critical environmental and social issues in wood supply chains. This includes screening available maps and data about areas of HCV in Europe. We have developed an overview of risk information platforms (indices, reports, etc.) to enable effective ranking of risks in our wood fibre sourcing regions.

Working with others to secure sustainable wood fibre supply for the bioeconomy

Collaboration is key to achieving positive change at scale to secure supplies of sustainable wood fibre for the forest industry. We develop partnerships that promote and catalyse action beyond the regulatory landscape and span the entire wood fibre supply chain. Improving resilience of forests to climate change is a challenge that requires wide collaborative efforts, extending beyond traditional operational boundaries.

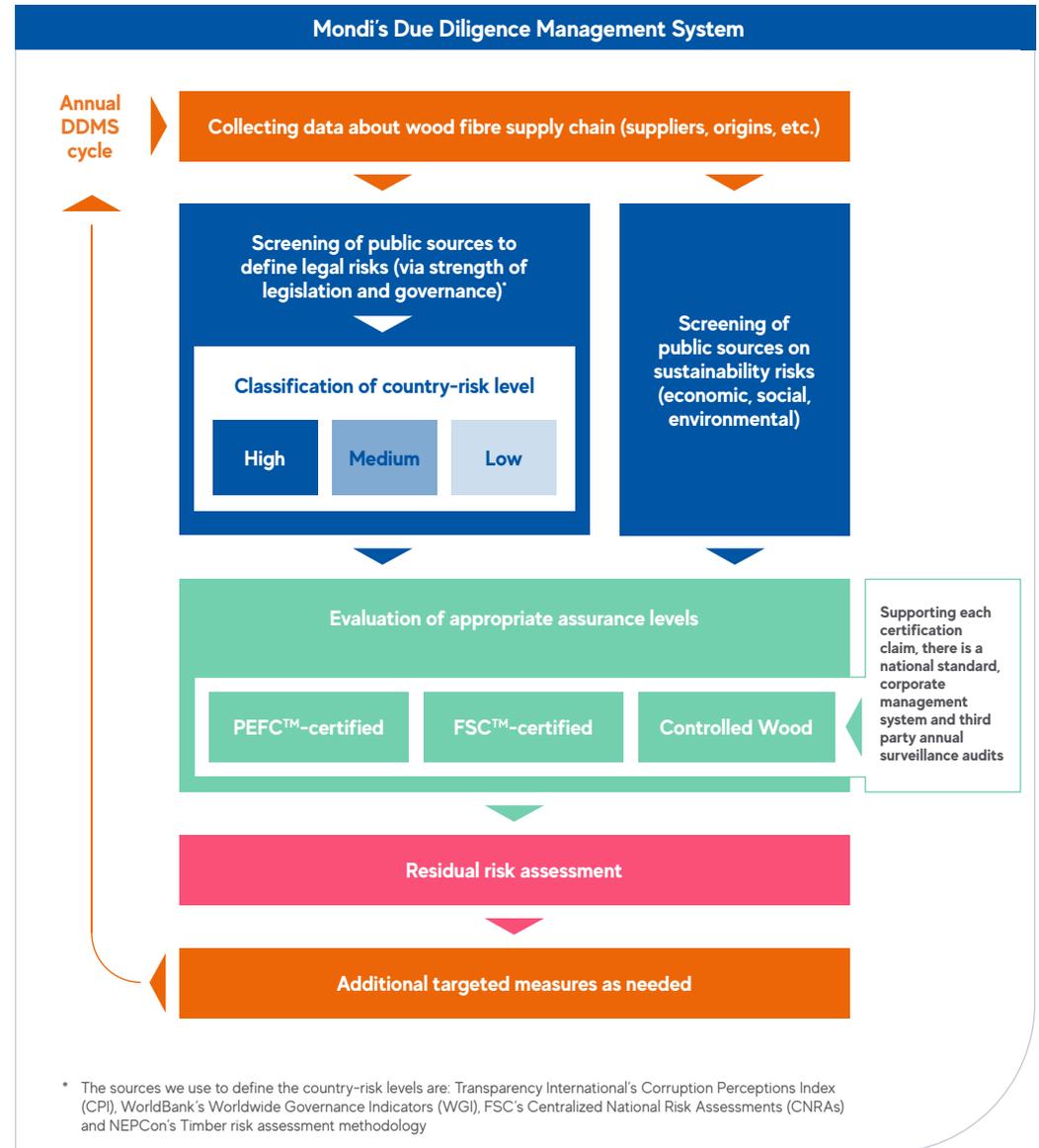
Mondi is a member of the World Business Council for Sustainable Development (WBCSD) Forest Solutions Group (FSG). Just over a year after the launch of the Forest Sector SDG Roadmap, WBCSD's FSG published its first Implementation Report. The report provides a holistic assessment of the forest sector's many connections with global development issues, including climate change, water scarcity, biodiversity loss and social inequality.

We are an active member of the Confederation of European Paper Industries (Cepi), which represents the interests of the paper industry in different regulatory bodies. We have joined the new Cepi alliance, 4evergreen, launched in January 2020. In the same year, Cepi published a report on "Climate effects of the forest-based sector in the European Union", highlighting that the EU forests act as a carbon sink.



We know from 25 years of monitoring that Europe's forests have been constantly growing. These forest areas have expanded by some 17.5 million hectares and wood stock has grown by 10.1 billion m³. To be able to protect them, it's crucial we understand the impacts of climate change on these forests. We've been working with the International Union of Forest Research Organizations (IUFRO) and other partners since 2017 to explore the outlook of climate change impacts on Europe's forests and wood supply.

Manfred Schachenmann
Mondi Head of Wood Supply





Sustainable fibre

4

Supporting fit-for-purpose forest certification

Forest certification is a fundamental building block of our due diligence. We promote credible forest certification that is robust, accessible to different forest users and applies a balanced, risk-based approach to different forest types and supply chain conditions. We actively support the improvement of governance systems and certification standards.

We support the setting of global standards for environmentally appropriate, socially beneficial and economically prosperous forest management. At the same time, we engage with certification schemes at international and national levels to support a relevant and effective approach in different regions. Mondi is an international member of both FSC and PEFC.

In 2020, we actively engaged with the PEFC International Secretariat and its International Stakeholder Members liaison group to contribute to strategy discussions. The focus is on preserving credibility, integrity and transparency of PEFC and identifying ways to address global challenges at scale, while maintaining PEFC's strengths for small forest owners.

We engage with FSC primarily at a national level, focusing on Russia and South Africa where we have our own forestry operations. In 2020, we worked with WWF and FSC to investigate the experience of key stakeholders in implementing the new FSC standard requirements in Russia and

South Africa. Our aim was to ensure a smooth implementation of the new requirements and optimise support provided to certified companies.

Risk levels can vary across regions and within countries. In 2020, we worked with WWF and FSC Italy to conduct an in-depth review of the Controlled Wood risks designation in the National Risk Assessment, specifically for three provinces in northern Italy. Italy was chosen because it has a significant variability in risks with its forestry sector managed at a regional or provincial level. The learnings from this project can be applied, where there is significant risk variability within a given country.

Promoting inclusion of small and medium forest enterprises

Including small and medium-sized enterprises (SMEs) in the wood supply chain can help meet demand for sustainable fibre and support the wellbeing and livelihoods of forest communities. Achieving certification can be a challenge for small forest operators due to the complexities and costs involved.

We have been working with WWF to explore opportunities for smallholder certification in higher risk European countries. We implemented a project in Romania – a country where smallholder certification issues are prominent and where the FSC national forest management standard is under development. The project tested the applicability of the new FSC forest management standard for smallholders to identify challenging requirements which require reconsideration and simplification. One of the main recommendations was to improve access for smallholders to implement the simplified

FSC standard requirements for so-called “small and low intensity managed forests” (SLIMFs). We have now recommended revised SLIMF thresholds for property size and forestry intensity to better fit the forest ownership structure in the country.

In Russia, 12 rural forest SMEs benefited from our social forest projects between 2016 and 2020. During this five-year period, we sold 300,000 m³ of standing wood from our leased areas to help secure saw log supplies to rural sawmills under attractive commercial conditions. These local independent logging operations utilise the best assortments for their own needs. They then have the opportunity to sell the lower quality wood to Mondi Syktyvkar – comprising a total of 150,000 m³ in volume over the five years. Mondi Syktyvkar also offers annual training to over 100 forestry contractors and wood suppliers working with Mondi, including SMEs, to ensure compliance with our sustainability requirements.

In South Africa, the small-scale timber grower programme has benefited over 3,200 growers with support from Mondi Zimele. Approximately 426,000 tonnes of wood has been sourced from rural smallholdings (1-2 hectares each) between 2016 and 2020. Over this period, Mondi Zimele distributed 5.6 million seedlings and provided training, mill visits and knowledge-sharing field days to eligible small growers. After a long period of collaborative and targeted efforts, a community of small growers achieved FSC certification for the first time in 2020 – a breakthrough for small-scale wood growers in the **CMOs Group Scheme** in South Africa (via the Zimele Woodlot Growers Scheme).

“When it comes to certification, we don’t believe ‘one solution fits all’. Responsible sourcing for our products is, however, crucial for both our customers and for us.”

Markus Gärtner
CEO Corrugated Packaging



In 2020, COVID-19-related restrictions resulted in delayed site visits during surveillance and DDMS audits and stakeholder consultations at some operations. In addition to field work, we monitor the management of High Conservation Value Forests via remote sensing and GIS. This proved a valuable tool for enabling auditors to monitor logging operations remotely while travel was restricted.

Explore how we monitor our nature conservation network in Russia





5 Climate change

We are taking action on climate change to protect the future of our planet. For us, that starts with reducing our products' carbon footprint. We're transitioning to low carbon energy and using our leading role in forestry management to help tackle the climate crisis.

Why is this important?

Despite warnings of catastrophic impacts if the global temperature rises more than 1.5°C, emissions continue to increase.¹ Our customers and their consumers are concerned about the consequences of climate change. Our sector is energy-intensive and we must reduce emissions while managing climate impacts on our operations and supply chain.

What's our impact?

Our science-based targets were approved by the Science Based Targets initiative in 2019 and we are making good progress. We reduced Scope 1 and 2 greenhouse gas (GHG) emissions by 9.6% per tonne of saleable production in this year.

Since 2015, we have invested around €500 million in low carbon technologies and energy efficiency measures across our mills' energy plants and manufacturing operations.

This has enabled us to reduce Scope 1 and 2 GHG-specific emissions by 23.6% since 2014. We have increased the proportion of renewable energy in our own energy generation to 67.0% since 2014 (from 59.3%) and our electricity self-sufficiency has grown from 95.4% to 103.8%. We reduced our Scope 2 emissions per MWh by 1.8% since 2019 and 6.1% since 2014 by purchasing electricity with a lower carbon intensity.

Our science-based targets to 2025 and 2050

Reduce Scope 1 and 2 GHG emissions 34% per tonne of saleable production by 2025 and 72% per tonne of saleable production by 2050, from a 2014 baseline²



Reduce Scope 2 GHG emissions 39% per MWh by 2025 and 86% per MWh by 2050, from a 2014 baseline



Our strategic SDGs and targets



SDG 7 Affordable and clean energy

- **Target 7.1** Ensure universal access to affordable, reliable and modern energy services
- **Target 7.2** Increase substantially the share of renewable energy in the global energy mix
- **Target 7.3** Double the global rate of improvement in energy efficiency
- **Target 7.a** Enhance international cooperation to facilitate access to clean energy research and technology



SDG 8 Decent work and economic growth

- **Target 8.2** Achieve higher levels of economic productivity through diversification, technological upgrading and innovation
- **Target 8.4** Improve global resource efficiency and endeavour to decouple economic growth from environmental degradation



SDG 13 Climate action

- **Target 13.1** Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries
- **Target 13.2** Integrate climate change measures into national policies, strategies and planning
- **Target 13.3** Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning

For links to all other SDGs, see the full [SDG Index](#)

What's next?

As part of our MAP2030 commitment to take action on climate, we are exploring indirect GHG emissions across our value chain to set a science-based Scope 3 greenhouse gas emission reduction target.

Together we are...
reducing our emissions
and working towards
a low carbon future



Climate change

5

Understanding what the climate crisis means for our business

Climate change has the potential to affect our business in many ways. We continue to improve our understanding of the risks and opportunities and to evolve our transparent reporting. In 2020, we formalised a cross-functional team, supported by external experts, to reassess Mondi's climate-related risks and opportunities.

We identify and assess climate-related risks using our Group-wide risk management framework. We evaluate and report on our short- (up to 3 years), medium- (3-7 years) and long-term (more than 7 years) climate-related transition and physical risks and opportunities, and their financial implications. 'Transition risks' may occur when moving towards a less polluting, greener economy. Such transitions could mean that some sectors of the economy face big shifts in asset values or higher costs of doing business. Climate change means we may face more frequent or severe weather events like flooding, droughts and storms. These events bring 'physical risks' that impact our society directly and have the potential to affect the economy.

We are committed to adhering to internationally accepted recommendations – such as the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD) – to investigate and report our climate-related risks and opportunities. The TCFD recommends applying widely-used reference scenarios that are publicly available and peer reviewed. We assess the financial implications of climate-related risks according to the TCFD recommendations³, considering a 2°C scenario⁴ and a business-as-usual scenario.⁵ We revised our climate-related risks and opportunities in 2020.

As part of this revision, we have quantified the potential financial impacts of climate change on certain parts of our business. The tables on the next two pages provide more detail on the risks and opportunities that we have evaluated.

We continue to develop and improve our understanding of these risks and will update our reporting accordingly.

 [Read more about our risk management in our Integrated report on pages 74-75](#)

 [For a full index of where to find our climate-related financial disclosures, please see page 59 in our Integrated report](#)

Together we are...
supplying
renewable
secondary raw
materials to the
chemical industry

Instead of incinerating by-products from pulp production for energy generation, we can sell biomass-based chemicals like tall oil as low-carbon secondary raw materials. During the pulping process, we separate tree resins from other wood components.

These resins can be extracted as sulphate soap which, when treated with sulphuric acid, produces tall oil. Tall oil is used by refineries to produce products like coatings, adhesives, oilfield chemicals, plastic resins and biodiesel. At Mondi Syktyvkar, we've invested in a tall oil plant, which can produce around 40,000 tonnes of crude tall oil per year. The oil will partly be used in production and partly supplied to refineries as bio-feedstock – directly replacing fossil fuels like crude oil and natural gas and saving about 140,000 tonnes CO₂e annually.

Klaus Peller, Managing Director, Mondi Syktyvkar





Climate change

Understanding what the climate crisis means for our business

Our climate-related risks⁶

	Risk description and impact	How we manage and mitigate the risk
<p>GHG regulatory changes Regulatory induced costs for GHG emissions may increase due to carbon tax and emission trading schemes Timeframe: medium-term</p>	<p>Nine of Mondi's 13 pulp and paper mills fall under the EU Emissions Trading Scheme (EU ETS). While most of these mills have sufficient ETS allowances, there is potential that four will face a deficit in the period beyond 2020. In addition, the South African government charges a carbon tax on emissions from fossil fuels, which includes fossil fuel combustion at our Richards Bay and Merebank operations. 1.6 million tonnes or 45% of Mondi's total Scope 1 GHG emissions are covered by carbon tax or emission trading schemes. We estimate the potential impact of carbon or similar taxes on our business to be around €10 million per annum.</p>	<p>We collect detailed information on GHG emissions from our mills and ensure the cost of carbon is factored into our investments. Our science-based GHG reduction target is based on the energy efficiency (e.g. modernisation of our manufacturing and energy generation equipment) and low carbon energy investments we expect to implement to reach our targets by 2025. Our ongoing investment in low carbon technology and energy efficiency will reduce the regulatory risk of insufficient CO₂ allowances, especially at our EU-based operations.</p>
<p>Chronic changes in precipitation Water supply must be maintained to sustain operations in water scarce regions Timeframe: long-term</p>	<p>Extended water shortages are a concern as they could disrupt production at our operations. This is relevant in water scarce regions such as South Africa. Water supply to our Richards Bay mill is already under pressure from urban development. The potential effect of reduced production due to water shortages at our Richards Bay mill is estimated at up to €10 million per annum.</p>	<p>During the recent drought in South Africa, we significantly reduced specific contact water consumption at our Richards Bay mill by implementing closed loops and recycling water used in our processes. We are working with local authorities and other industries to identify solutions to enhance water stewardship across the entire water catchment surrounding Richards Bay. We have conducted water stewardship assessments at our Richards Bay mill and two plantations in South Africa to understand their water use and impacts. We are now using the outcomes to investigate cost-effective improvements to local water management systems.</p>
<p>Supply chain impacts Climate change may result in fibre yield losses in Mondi's forests Timeframe: medium-term</p>	<p>Increased severity and frequency of extreme weather events may result in disruptions and decreased harvesting capacity of our managed forests. Extreme weather conditions may impact forests and plantations through sustained higher temperatures, which can lead to stronger winds and increased windfalls. Plantations may be vulnerable to changes in rainfall patterns and erosion. Higher temperatures may increase vulnerability of forests to pests and diseases. Exacerbated by drought conditions, fire remains a challenge for our South African plantations, which we believe are more vulnerable to fibre yield losses than our Russian forests. We estimate the financial impact due to potential yield losses in our South African plantations could be up to €15 million per annum.</p>	<p>Our tree improvement programme aims to produce stronger, more robust hybrids that can resist disturbances such as drought, pests and diseases. We mitigate fire risks with naturally vegetated open corridors acting as fire-breaks between forest plantations. We have invested in a firefighting fleet at our South African plantations. We also minimise combustible material that remains behind at logging sites after harvesting operations. We have improved pre- and post-burning assessments at harvesting sites. These assessments aim to mitigate the risks of erosion and nutrient loss after prescribed burning to ensure healthy soils, which are critical for productive plantation forests.</p>
<p>Supply chain impacts We may face higher costs for externally procured fibre Timeframe: long-term</p>	<p>Temperature increase, changes in rainfall patterns and windstorms can result in large-scale forest damage in central Europe. At lower altitudes, fibre losses from bark beetle damage to spruce stands are expected to continue unless precipitation increases. Our mills in Europe are sensitive to the economic development of the sawmill industry. A reduction in the cutting capacity of the sawmilling industry due to a lack of spruce saw logs could lead to a change in the mix of available pulpwood and sawmill chips. Increasing competition for wood is being driven by demand for renewable raw materials and timber for green energy generation to achieve EU GHG reduction and Net Zero targets. At the same time, there is a call to increase forest areas set aside for conservation. All of this may contribute to increased pricing for wood, resulting in a potential risk of €20-70 million per annum in the long term.</p>	<p>In mountainous regions, we expect an increase in yearly forest growth due to rising temperatures. At lower altitudes, spruce will be mainly replaced with other softwood species. We are investigating alternatives to support flexibility in species mix for our future pulp production. We invest in research and development (R&D) projects and are building strategic partnerships with forest owners and industries, NGOs and scientific institutions to foster sustainable forest management. This is supported by the sustainable working forest model and fit-for-purpose certification concepts, which we developed and promote with our partners. We have started to explore approaches to climate-fit forestry to enhance forest ecosystems' resilience. We also promote the cascading use of wood nationally and via Cepi on a European level.</p>
<p>Risk of flooding Stricter flood protection needed according to revised flooding plans Timeframe: long-term</p>	<p>Our mills use large volumes of water and are often located close to rivers. The risk of flooding may increase due to surface water flooding (e.g. after extreme rainfall or rapid snow melting) or flooding of low-lying coastal regions (due to sea level rise). We have invested to mitigate the potential impact of flooding and have assumed we should not have a prolonged shut. In the event of flooding at one of our mills which are in higher risk areas, the cost is estimated at up to €10 million.</p>	<p>Our mills have revised their flood prevention plans and invested in flood protection, in some instances with government and energy companies running hydropower plants in adjacent areas. Detailed flooding plans consider potential flooding events caused by relevant sources of water and the topography and hydrogeology of the mills. Current assessments show the measures taken are generally sufficient and only a few additional smaller measures are required (e.g. elevation of motors and vulnerable equipment, additional pumps, water level sensors).</p>
<p>Stricter regulation Evolving requirements on effluent water temperature Timeframe: medium-term</p>	<p>Climate change may increase annual mean temperatures and the temperature of river water. We use surface water, including river water, in production and for cooling at our mills and energy plants. Higher water temperatures increase the amount of water needed for cooling and may lead to critical temperatures in the wastewater treatment plants. Our mills have permits for water withdrawal. In most cases, the permits contain water temperature limits for water discharge. We see a potential impact of €5 million per annum for measures to prevent exceeding water permission limits.</p>	<p>To mitigate the risk of increasing administrative expenses and fines, we are investigating investments in additional water-cooling equipment (e.g. cooling tower, heat exchanger) at some of our mills. For example, we are considering the construction of wastewater cooling towers at some of our mills.</p>
<p>Changing customer behaviour Trend towards recyclable, low carbon, renewable (fibre-based) products instead of plastic Timeframe: short- to long-term</p>	<p>The drive to replace plastic packaging with fibre-based alternatives is a significant opportunity for our business. However, certain plastic-based products within our portfolio could face lower demand due to this shift from plastic to paper. A significant proportion of the Group's flexible plastic-based packaging is focused on value-added segments, serving mainly food, pet food and other consumer end-users. There are currently limited paper-based alternatives for a significant proportion of these products, which contain barrier properties (such as moisture, grease, gas properties, etc.) to preserve and protect products. We estimate the potential operating profit impact due to loss of some commodity plastic business at around €5 million per annum.</p>	<p>We're leading the industry in researching innovative design for our products, including flexible plastic-based sustainable packaging solutions. We believe in using paper where possible, plastic when useful to create high-quality products with a focus on circularity. A significant proportion of our flexible plastic-based packaging products is focused on value-added segments, mainly serving food, pet food and other consumer end-users, where packaging requires barriers or functionality to protect the product from farm to fork and avoid food waste. We are developing a range of recyclable barrier paper solutions to replace plastic, as well as a range of recyclable flexible plastic solutions for applications requiring plastic barrier functionalities.</p>

Our climate-related risk We estimate the potential impact of climate change risks on our business could be up to €125 million per annum



Climate change

5 Understanding what the climate crisis means for our business

Our climate-related opportunities

	Description of the opportunity	How we realise the opportunity
<p>Avoided GHG emissions and secondary raw materials</p> <p>Instead of incinerating by-products from pulp production, low-carbon, biomass-based chemicals can be sold as secondary raw materials</p> <p>Timeframe: short-term</p>	<p>By-products of the kraft pulping process include turpentine and tall oil. These renewable by-products are highly valued as a substitute for fossil fuel-based materials. They can be used internally for energy generation or extracted, purified and sold as higher secondary raw materials.</p> <p>We are investigating opportunities to use other by-products (e.g. lignin from black liquor and Eucalyptol extraction) to create additional revenue streams.</p> <p>The potential additional income from this opportunity is estimated at around €30 million per annum.</p>	<p>The extraction and sale of renewable by-products from the kraft pulping process is part of our circular economy approach. We are exploring options to further utilise these renewable by-products. Additional investment is needed to extract and purify these by-products. For example, we have upgraded our tall oil extraction plant at our mill in Syktyvkar, which has enabled us to increase the volumes and improve our efficiency.</p> <p>Depending on the existing infrastructure at our other mills, further investments may be required. See case study on page 46.</p>
<p>Reduced operating costs through energy efficiency</p> <p>Identify and realise energy savings using global experts across our energy network</p> <p>Timeframe: medium-term</p>	<p>The production of pulp, paper and packaging is energy-intensive and energy generation is the major source of our GHG emissions.</p> <p>By improving the energy efficiency of our energy plants and manufacturing operations, we estimate potential energy cost savings of around €15 million per annum.</p>	<p>Investing in optimising energy and process efficiencies in our operations has been a long-standing focus. Since 2015, we have invested around €500 million in energy efficiency measures and in increasing biomass-based energy in our mills.</p> <p>We plan further investment projects to meet our science-based GHG reduction targets over the coming years. They will reduce our specific energy costs and allow the utilisation of materials with high energy content, which are currently treated as waste.</p>
<p>Substitution of natural gas with biogas</p> <p>Reduced energy costs by using biogas from the anaerobic wastewater process</p> <p>Timeframe: short- to medium-term</p>	<p>Biogases – such as methane and hydrogen – are the end-products of anaerobic wastewater treatment and can be used as a fuel. Anaerobic wastewater treatment plants are used when the chemical oxygen demand (COD) load of waste water is high and fairly constant, conditions which are typical in the recycled pulp process.</p> <p>By introducing further anaerobic wastewater treatment plants at our mills, we estimate potential savings of about €2 million per annum.</p>	<p>In 2020, we avoided 7,798 tonnes of CO₂e by substituting natural gas with 0.14 million GJ biogas generated in anaerobic wastewater treatment plants at our mills.</p> <p>To realise the full potential of this opportunity, we would need to install new anaerobic wastewater treatment plants (where feasible).</p>
<p>Changing customer behaviour</p> <p>Trend towards recyclable, low carbon, renewable (fibre-based) products instead of plastic</p> <p>Timeframe: short- to long-term</p>	<p>The drive to replace plastic packaging with recyclable, low carbon and renewable fibre-based alternatives is creating significant opportunities for fibre-based packaging producers.</p> <p>Mondi, as a leading packaging paper producer, is strongly positioned to benefit from the increased demand for fibre-based solutions that are renewable and recyclable by design.</p> <p>Based on third-party reports, the Group has estimated that the market opportunity in Europe for fibre-based packaging solutions to replace plastic could potentially be in the region of €4–€8 billion over the next decade. The Group has not quantified the specific opportunity to Mondi but believes it is well positioned to take advantage of this opportunity.</p>	<p>As a leading producer of both paper and flexible plastic-based packaging, Mondi is in a unique position to leverage the Group's innovation capabilities, leading market positions and strong customer base.</p> <p>We actively collaborate with customers using our EcoSolutions customer-centric approach to develop innovative solutions that are Sustainable by Design. This includes developing our range of recyclable functional barrier papers as an alternative to plastic-based solutions.</p> <p>We are investing in our asset base and increasing our cost-advantaged paper capacity to meet growing demand. Initiatives include a €67 million investment to convert a containerboard machine at our Stěti mill to produce speciality kraft paper for shopping bags and a €370 million investment in a new kraft top white machine and related pulp mill upgrade at our Ružomberok mill. See case study on page 58.</p> <p>We are leveraging strong partnerships to bring about positive change and drive the transition to a circular economy.</p>
<p>Transition of plastic-based products</p> <p>The growing customer demand for recyclable plastic-based products and/or the amount of recycled content contained within these solutions</p> <p>Timeframe: medium- to long-term</p>	<p>The growing focus on sustainable packaging is driving investment, collaboration and innovation by producers to meet evolving customer needs. This is increasing the focus on recyclability of plastic packaging and/or amount of recycled content contained within solutions.</p> <p>Our flexible plastic-based packaging offering is focused on delivering sustainable solutions to customers, developing innovative products through R&D and technical know-how, and extending our leading market positions.</p> <p>We are strongly positioned to preserve our current portfolio and gain market share from other producers unable to transition and develop fit-for-purpose, recyclable flexible-plastic based products or products made from sufficient recycled content.</p> <p>We believe we are well positioned to take advantage of that opportunity.</p>	<p>The Group has a strong focus on developing sustainable plastic-based flexible packaging to drive the development of recyclable products and those that contain a sufficient proportion of recycled content.</p> <p>To realise the opportunity, we will continue to partner with our customers, collaborate with other industry players and invest in strategic initiatives.</p>
<p>Our climate-related opportunities</p>	<p>Around €50 million per annum (excludes the potential opportunity from changing customer behaviour and the transition to plastic-based products, which have not yet been quantified)</p>	

[Read our previous CDP climate change disclosure](#)

The risks and opportunities that we have outlined in these tables represent the outcome of our evaluation in 2020. Our evaluation does not yet cover all risks or opportunities that our business may face. In line with TCFD recommendations, we will continue to develop our understanding of climate-related risks and opportunities and improve our quantification thereof. This means that our reporting will also be updated in line with our evolving understanding in the coming years. We believe that Mondi is well positioned to capitalise on climate-related opportunities in the coming years.



Climate change

5 Delivering science-based targets

We support the transition to a low-carbon economy. In 2019, our science-based GHG reduction targets were approved by the Science Based Targets initiative (SBTi). The two targets together cover more than 95% of Mondi's total Scope 1 and 2 emissions.⁸

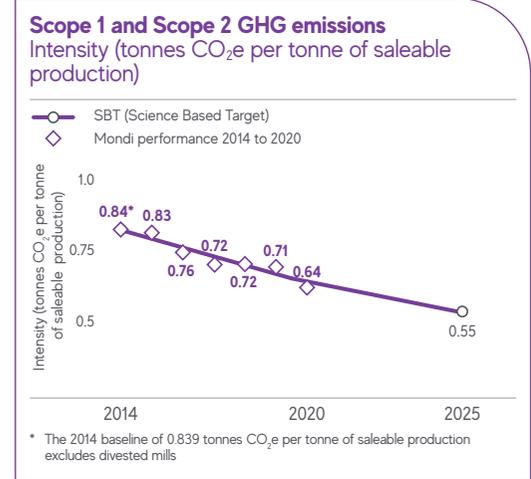
Target 1:
Reduce Scope 1 and 2 GHG emissions by 34% per tonne of saleable production by 2025 and by 72% per tonne of saleable production by 2050 from a 2014 base year.

This target covers total Scope 1 and 2 emissions of our pulp and paper mills and aligns with the pulp and paper sector reduction pathway under a 2°C scenario within the Sectoral Decarbonisation Approach.

Target 2:
Reduce Scope 2 GHG emissions by 39% per MWh by 2025 and by 86% per MWh by 2050 from a 2014 base year.

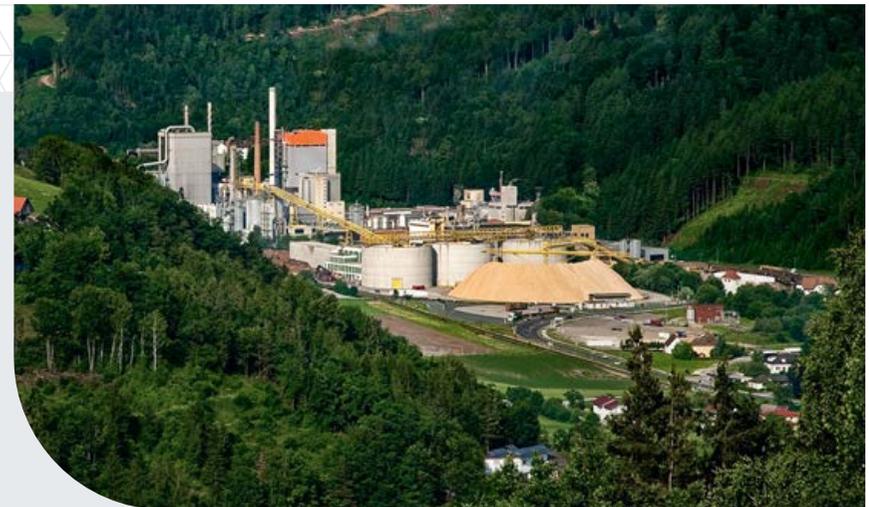
This covers the Group's total Scope 2 emissions and aligns with a 2°C scenario within the Absolute Contraction Approach.

We are exploring a science-based GHG reduction target for our Scope 3 emissions, which takes into account the GHG emissions in our value chain. Mondi has also committed to support the global transition to a low-carbon economy by positively influencing the sector and policy makers through responsible engagement on climate policy. Read more on the We Mean Business homepage.⁹



“Climate change is one of the biggest threats to our future. Rapid and deep cuts to greenhouse gas emissions are urgently needed. It is essential that science-based targets become embedded in standard business practice and businesses like Mondi are central to this transition.”

Lisa Simon
Head of Climate & Sustainable Finance Programme, WWF Austria





Climate change

5 Increasing energy efficiency and reducing emissions

Our industry is energy intensive. We combine strategic energy-related investments at our pulp and paper mills with good management and best practice sharing. We invest in optimising energy and process efficiencies and replacing fossil fuel-based energy with renewable biomass sources.

We purchase fossil fuels and use biomass to generate most of our energy and electricity on-site in our energy plants. Energy and related input costs contribute significantly to the variable costs across our pulp and paper mills and converting operations.

Targeted energy-related investments and improvements are planned in the short, medium and long term across our mills. Investments in energy efficiency at our plants and shifting our fuel mix towards renewable biomass offer the most significant potential for reducing our GHG emissions.

We identify energy efficiency projects through our internal energy efficiency programme, called DIANA. Projects are assessed against the investment required, potential financial, energy and CO₂ savings and their contribution to energy security.

We have invested around €500 million in energy efficiency since 2015. We have also engaged with electricity providers to increase the share of renewable energy in our purchased electricity and reduce our Scope 2 emissions by lowering the CO₂ factor per MWh purchased. In 2020, 5% of our purchased electricity was generated by renewables.

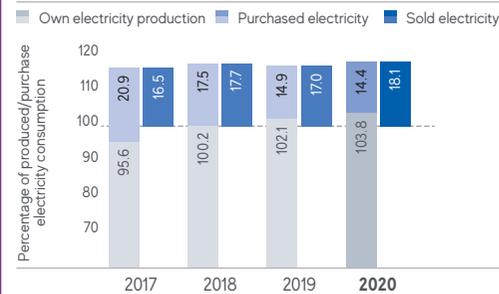
€500m

invested in energy-related projects

In the second half of 2015, we commissioned a new recovery boiler, turbine and a biomass boiler at Mondi Świecie (Poland). In 2018, we started up an evaporation plant, recovery boiler and turbine at Mondi Štětí (Czech Republic). In 2019, we modernised the energy plant at Mondi Syktyvkar (Russia).



Electricity consumption produced/purchased (%)



Specific production-related GHG* (tonnes CO₂ per tonne of saleable production)



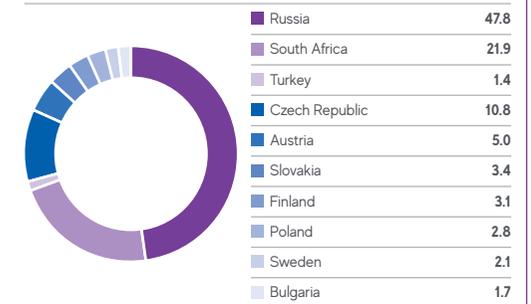
* From our pulp and paper mills

GHG emissions from our pulp and paper mills



a Scope 1: Energy sales GHG emission (million tonnes)
b Scope 1: Production related GHG emission (million tonnes)
c Scope 2: Production related GHG emission (million tonnes)

GHG emissions by country (%)



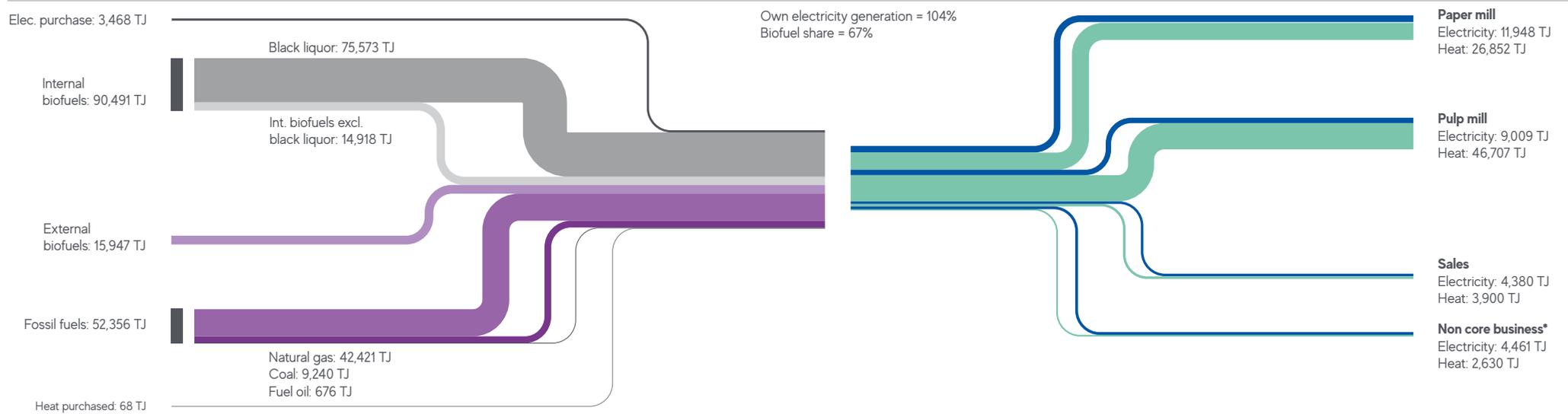
European mills are shown in blue



Climate change

5 **Increasing energy efficiency and reducing emissions**

Energy balance from our pulp and paper mills

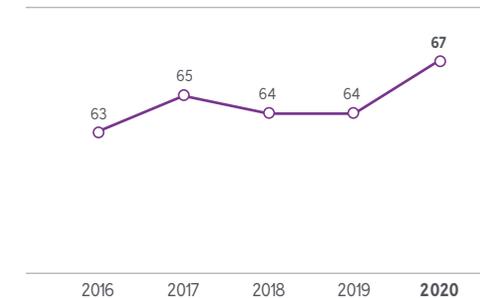


* Including finishing, power generation, utilities and others

Energy consumption of our pulp and paper mills

	2020	2019	2014 baseline	% change 2019-2020
Energy consumed by pulp and paper core processes in the form of heat and electricity at our operations	94.5 million GJ	91.1 million GJ	90.7 million GJ	3.8%
Electricity purchased by our mills from external sources	3.5 million GJ	3.6 million GJ	7.6 million GJ	- 4.3%
Total electricity requirements for producing pulp and paper	21.0 million GJ	19.8 million GJ	20.0 million GJ	5.7%
Total heat requirements for producing pulp and paper	73.6 million GJ	71.3 million GJ	70.7 million GJ	3.2%
Energy sold to the local grids	8.3 million GJ	8.3 million GJ	10.8 million GJ	0.3%
Total energy sales including green fuel sales	9.9 million GJ	9.8 million GJ	12.8 million GJ	0.7%
Our mills' electricity self-sufficiency ¹⁰	104%	102%	95%	2%

Renewable energy in mills' fuel consumption (%)





Climate change

5

Increasing energy efficiency and reducing emissions

GHG emissions

	2020	2019	2014 baseline ¹¹	% change 2019-2020
Absolute Scope 1 emissions of mills	3.5 million tonnes CO₂e	3.9 million tonnes CO ₂ e	4.3 million tonnes CO ₂ e	-9.7%
Absolute Scope 2 emissions of mills	0.43 million tonnes CO₂e	0.46 million tonnes CO ₂ e	1.0 million tonnes CO ₂ e	-6.0%
Specific GHG emissions of our mills (per tonne of saleable production) ¹²	0.64 tonnes CO₂e	0.71 tonnes CO ₂ e	0.84 tonnes CO ₂ e	-9.6%
Specific Scope 1 emissions of our mills (per tonne of saleable production)	0.57 tonnes CO₂e	0.64 tonnes CO ₂ e	0.69 tonnes CO ₂ e	-9.9%
Specific Scope 2 emissions of our mills (per tonne of saleable production)	0.07 tonnes CO₂e	0.07 tonnes CO ₂ e	0.15 tonnes CO ₂ e	-6.2%

GHG emissions from our pulp and paper mills

Our GHG reporting boundaries are defined according to the 'operational control' principle. This is in line with the recommendations of the World Business Council for Sustainable Development (WBCSD) GHG Protocol. See [page 105](#) for further details of our GHG emissions scope and boundaries.

Scope 1 GHG emissions are related to production (for pulp and paper mills) and energy sales. In 2020, the Scope 1 emissions of our mills were reduced by 9.7%, mainly due to our investments in energy efficiency projects and modernisation of our energy plant in Syktyvkar.

Our mills' Scope 2 emissions decreased significantly by 6.0% as a consequence of increased electricity self-sufficiency and increased purchase of renewable electricity for our Austrian operations.

45% of the Group's Scope 1 emissions are reported in regions with limits on GHG (e.g. EU ETS, South Africa's CO₂ tax).

Converting operations

Our converting operations have a limited impact on the Group's total Scope 1 emissions, which are dominated by the energy generation in our pulp and paper mills. They contribute 34.2% of the Group's total Scope 2 emissions.¹³ The current focus of our converting operations is on increasing energy efficiency and the purchase of electricity from renewable sources.

Energy sales-related GHG emissions

Energy sales-related GHG emissions were 0.8 million tonnes CO₂e (2019: 0.9 million tonnes) and accounted for 20% of the Group's total CO₂e emissions in 2020. Our energy efficiency investments allowed us to generate energy with a lower carbon intensity, resulting in a 24% reduction compared with the 2014 baseline in the energy-sales related CO₂ factor and a reduction in CO₂e emissions.

Scope 3 emissions

Indirect (Scope 3) emissions arise from transportation of products and raw materials, employee commuting, business travel, disposal of waste and production of fuels and raw materials. All other Scope 3 categories referred to in the GHG Protocol are not relevant for Mondi.

In 2020, Scope 3 emissions were estimated at 3.3 million tonnes CO₂e. In recent years, we have increased the number of categories we report as Scope 3 emissions to provide a more complete picture of our indirect emissions. We are currently working with WWF Climate Savers and an external consultant to evaluate a potential science-based Scope 3 reduction target.

Avoided emissions

We sell the excess energy we generate from our pulp and paper processes, usually to the public grid, for district heating and electricity in the vicinity of our mills. In 2020, we avoided emissions of some 0.12 million tonnes of CO₂e through the sale of approximately 1.62 million GJ green fuels (including pitch fuel, sulphate soap, tall oil and turpentine). We avoided 7.8 thousand tonnes of CO₂e by substituting natural gas with 0.14 million GJ biogas generated in anaerobic wastewater treatment plants at our mills. We also avoided about 0.08 million tonnes of CO₂e by sending 61,450 tonnes of foil waste from the recycled pulp process to a nearby company that generates energy from waste.

Transparency and benchmarking

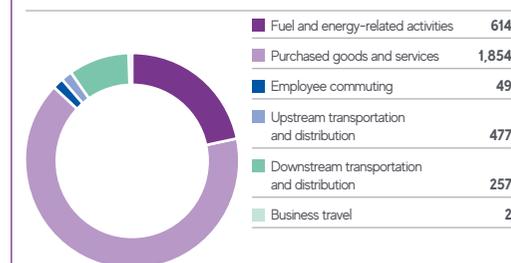
We participate in a wide range of benchmarking and transparency initiatives. They include CDP, Paper Profile and WWF's Environmental Paper Company Index (EPCI) – last conducted in June 2019.

We are able to provide our customers with detailed product carbon footprints for all our fibre-based products on request, based on the principles of Cepi's 10 Toes Framework for the development of carbon footprints for paper and board products.¹⁴ We can also provide customers with a carbon footprint for our plastic-based products in line with ISO 14067 as part of our new life cycle assessment tool. See [page 80](#).

As a member of the We Mean Business Coalition, we support its Responsible Corporate Engagement in Climate Policy initiative and the Science Based Target Initiative.

We disclose our energy and climate performance in our annual reports. We also conduct an internal audit programme for all activities that influence climate policy and communicate actions, outcomes and GHG performance and reduction targets via our CDP disclosure and through our WWF Climate Savers partnership.

Scope 3 emissions (thousand tonnes CO₂e)





6 Constrained resources and environmental impacts

We are committed to developing circular systems that use less energy and water and produce less waste. By investing in the latest technologies, we are reducing our impacts on the environment and communities. We believe we will achieve more by working in partnership to drive large-scale change across the value chain.

Why is this important?

The way our society uses raw materials causes resource scarcity, pollution, biodiversity loss and climate change. We must work together to reverse environmental degradation and develop innovative technologies that support a circular economy. Our manufacturing is resource-intensive and we see every emission to water, air and land as a lost resource.

Together we are...
protecting the environment and reducing water use and eliminating waste

What's our impact?

We are proud to have achieved almost all the environmental commitments we set for our last five-year period.

We missed our ambitious contact water reduction target due to some process disruptions at our Richards Bay mill (South Africa) and the startup of the upgraded pulp mill in Ružomberok (Slovakia).

Overall resource efficiency of our manufacturing operations has been improved by finding innovative ways to avoid, reuse or recycle our waste. In 2020, we sent 25.4% less waste to landfill than in 2015.

We reduced specific NOx emissions from our pulp and paper mills by 13.7% compared with 2015, by making significant investments in new biomass boilers and modernising our energy plants.

We achieved an 18.4 % reduction of COD in 2020 compared with 2015 – mainly due to investments at our mills in Świecie (Poland) and Syktyvkar (Russia).

Despite these successes, we have faced some challenges during the past five years, such as the impact of an extended drought in South Africa. Water is vital to our manufacturing processes, therefore we will strengthen our focus on water use, especially in water scarce regions, in the future.



Our commitments to 2020

Reduce specific¹ contact water consumption from our pulp and paper mills by 5% from a 2015 baseline 5-year performance



Reduce specific waste to landfill by 7.5% from a 2015 baseline 5-year performance



Reduce specific NOx emissions from our pulp and paper mills by 7.5% from a 2015 baseline 5-year performance



Reduce specific effluent load to the environment (measure COD) by 5% from a 2015 baseline 5-year performance



Our strategic SDGs and targets



- SDG 6 Clean water and sanitation**
- Target 6.3 Improve water quality, halve the proportion of untreated waste water and increase recycling and safe reuse
 - Target 6.4 Increase water-use efficiency, ensure sustainable withdrawals and supply of fresh water and reduce the number of people suffering from water scarcity
 - Target 6.5 Implement integrated water resources management



- SDG 8 Decent work and economic growth**
- Target 8.4 Improve global resource efficiency and endeavour to decouple economic growth from environmental degradation



- SDG 9 Industry, innovation and infrastructure**
- Target 9.4 Upgrade infrastructure and retrofit industries to make them sustainable



- SDG 12 Responsible consumption and production**
- Target 12.2 Achieve sustainable management and efficient use of natural resources
 - Target 12.4 Achieve the environmentally sound management of chemicals and all wastes through their life cycle
 - Target 12.5 Reduce waste generation through prevention, reduction, recycling and reuse

For links to all other SDGs, see the full [SDG Index](#)

What's next?

As part of our new MAP2030 commitments, we will continue to improve the environmental performance of our operations. We have set targets for 2025 to reduce waste to landfill, COD and NOx emissions, and contact water use.



Constrained resources and environmental impacts

6 Using resources efficiently

From product design to responsible sourcing, resource efficiency is central to many of our material issues. It is also fundamental to achieving our Growing Responsibly commitments.

We adhere to the principle of resource efficiency as defined by the United Nations Environment Programme (UNEP).² Over the last decade, our investments in Best Available Techniques (BAT)³ have significantly improved our resource efficiency. Our approach includes:

- reducing emissions to air and water;
- encouraging the recycling, reuse and substitution of natural resources with secondary raw materials;
- increasing energy efficiency and reducing the energy intensity of processes;
- increasing our use of renewable energy;
- using by-products from our manufacturing processes for energy generation and as renewable raw materials; and
- using water efficiently and responsibly.

Management systems and certification

Our precautionary approach⁴ ensures we make decisions that minimise or eliminate negative impacts on the environment and comply with applicable environmental regulations and permits. Our Sustainable Development Management System (SDMS) supports our operations, mills and converting operations to manage their impacts and improve environmental performance. It includes policies, standards and requirements for all aspects of sustainable development. 100% of our pulp and paper mills and forestry operations (2019: 100%) and 64% of our converting operations (2019: 62%) are certified to the international environmental management system standard ISO 14001.

Water

Access to safe and clean drinking water is essential to human wellbeing and is recognised as a basic human right. Manufacturing pulp and paper is water-intensive; our mills and converting operations may impact water resources and local communities through their water withdrawal and use. Water is also required for the growth of forests, which is the main source for our primary raw material, fibre.

We manage our water impacts by reducing water use and increasing water recycling. Our approach includes: assessing and managing our water-related risks; conducting basin- and production-related water stewardship assessments; investing in water recycling at our mills; investing in best available techniques (BATs) to treat and return our waste water without negatively impacting water quality; and developing partnerships with other water users to manage risks across entire catchments.

We recognise the need for collective action in response to the complex challenges facing water resources globally. In 2020, Mondi joined the Alliance for Water Stewardship (AWS)⁵ – a global membership collaboration comprising businesses, non-governmental organisations (NGOs) and the public sector. AWS members contribute to the sustainability of local water resources through their adoption and promotion of a universal framework for the responsible use of water – the International Water Stewardship Standard (or AWS Standard) – which drives, recognises and rewards good water stewardship performance.

With AWS and WWF, we developed a Group water stewardship standard that is designed to set out how our mills will use operation- and catchment-based context to determine a contextually appropriate level of water stewardship response. This work was guided by the current version of the AWS Standard and considers each mill’s exposure to water-related risks using WWF’s Water Risk Filter.⁶

As a first step, we assessed the physical, regulatory and reputational risks for each mill to determine the potential risks they pose to surrounding water basins. We have completed water stewardship assessments for some of our South African operations and will continue to conduct assessments for our other mills and forests. We will begin to roll out our Group water stewardship standard across our operations in 2021.

Based on the findings of our previous water impact assessments, we are not aware of any mills that are significantly affecting water bodies and related habitats.

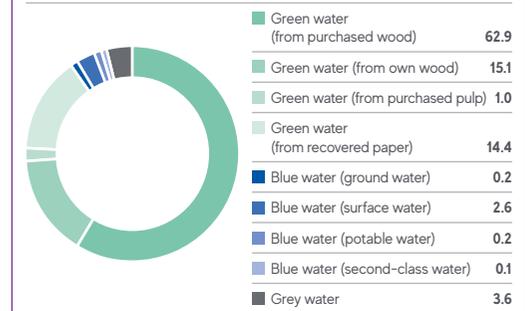
Our water footprint

We calculate the water footprint of our wood supply chain using widely accepted data sources⁷ and request water footprint data from our pulp suppliers annually. The water footprint chart shows our freshwater use for production and our indirect water use from our value chain (e.g. from our raw material supply).

93% of the blue water we withdraw from freshwater resources⁸ is released back to the environment (88% to rivers and lakes; 5% to the sea). The remaining 7% evaporates during production or is included in our products.

In 2020, we withdrew 97.9 million m³ in water-stressed countries (South Africa, Czech Republic and Poland).⁹ Our water withdrawal in water-stressed regions reduced by 2.9% – the main contributing factor was the improved stability of operations at our Richards Bay mill.

Water footprint by type 2020* (%)



* Representing a total of approximately 10.4 billion m³



Constrained resources and environmental impacts

6 Using resources efficiently

Understanding our water-related risks

Our manufacturing processes require a high volume of good quality water and our pulp and paper mills are mostly located near rivers with sufficient water availability. We have the potential to impact other water users through our water withdrawal and use. Our operations located close to rivers may also be at risk of flooding.

We assess water-related risks using the WWF Water Risk Filter and the WBCSD Global Water Tool. We consider water availability using local historic and current data, FAO data and data provided by utility companies and governments.

We also look at catchment-wide quality and availability parameters. We assess risks that result from water discharge from our manufacturing sites using the WWF Water Risk Filter.

Reducing our water use

Withdrawal of water from freshwater ecosystems can impact the environment by lowering the water table¹⁰, reducing the volume of water available to other stakeholders and altering the ability of an ecosystem to perform its natural functions. This may have negative economic and social consequences for local communities.

The cost of the water we use and treat as waste water can be significant. Uncertainties over water availability can be a risk factor in some locations. We expect future water regulation to become stricter due to the impacts of global warming. For these reasons, reducing fresh water use is a priority, particularly in water-stressed and water-scarce regions.¹¹

Reducing water discharge

We aim to reuse and recycle water to reduce water withdrawal, discharge and wastewater treatment costs. This supports local and national goals for

managing water supply, which is especially important in water-scarce areas such as South Africa.¹² Recycling water can also help reduce energy consumption by using the heat content of water to improve energy efficiency.

Waste water quality

We closely monitor the volume and quality of the waste water we discharge to minimise its impact on the aquatic environment. We treat waste water from production in wastewater treatment plants and release it at a quality level that does not negatively impact the receiving water body. At some locations, such as Ružomberok and Syktyvkar, our facilities also treat the waste water from local communities. Since 2013, we have invested around €75 million in upgrading our wastewater treatment plants, including at our mills in Świecie and Syktyvkar.

Our commitment is to reduce the specific load (COD) of waste water by 5% by 2020 (compared with a 2015 baseline). Our focus on improving the quality of our waste water at our plant in Richards Bay resulted in a significant 39% reduction of COD in 2020 (13,576 tonnes COD) against 2019 (22,214 tonnes COD). The overall Group-specific COD reduction was 18.4% compared with 2015.

The investments made in our wastewater treatment plants have, since 2015, also significantly reduced emissions of eutrophication pollutants (e.g. phosphorous). For example, at our Syktyvkar mill where we also treat municipal waste water, we utilise this source of nitrogen and its phosphorus as nutrients in our wastewater treatment plant. This resource-efficient process significantly reduces eutrophication pollutants and avoids the addition of industrially manufactured nutrients.

Water withdrawal, use and discharges

	2020 performance	2019 performance	2015 performance	% change 2019-2020	% change 2015-2020	Reason for the change (2019-2020)
Total Group water input	317 million m ³	306 million m ³	309 million m ³	+3.6%	+2.8%	Increase due to higher non-contact water use in Frantschach (Austria)
Water directly used as contact water	205 million m ³	204 million m ³	210 million m ³	+0.6%	-2.2%	Increase mainly due to the startup of the upgraded pulp mill in Ružomberok
Water used indirectly as non-contact water (cooling water)	108 million m ³	99 million m ³	85 million m ³	+8.9%	+26.7%	Increase in non-contact cooling water use due to unusually hot summer months in 2020
Water input in water-scarce areas ¹³	24 million m ³	27 million m ³	29 million m ³	-10.9%	-16.3%	Improved stability of operations at our Richards Bay mill

Effluent and waste water quality

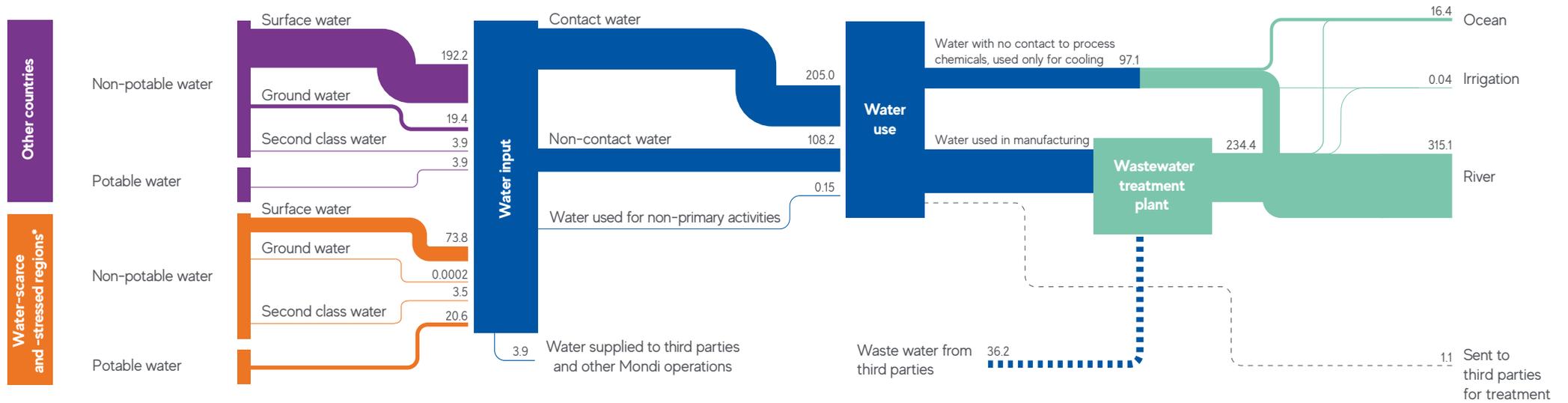
	2020 performance	2019 performance	2015 performance	% change 2019-2020	% change 2015-2020	Reason for the change (2019-2020)
Waste water released back to the aquatic environment ¹⁴	234 million m ³	236 million m ³	238 million m ³	-0.6%	-1.7%	
Waste water from third parties treated in our wastewater treatment plants	36 million m ³	37 million m ³	38 million m ³	-2.2%	-5.5%	Reduced amount of community waste water treated in our treatment plants at our mills in Ružomberok and Syktyvkar
Specific COD after wastewater treatment (per tonne of saleable production)	5.97 kg	7.89 kg	7.31 kg	-24.3%	-18.4%	The investments in wastewater treatment plants at our mills in Świecie and Syktyvkar and improvements in Richards Bay enhanced our COD removal efficiency
Total Chlorinated Organics (AOX) discharged	122 tonnes	153 tonnes	147 tonnes	-20.0%	-16.6%	Decrease mainly due to investment in the secondary effluent treatment plant in Richards Bay



Constrained resources and environmental impacts
6 Using resources efficiently

Water use
(million m³)

Sources

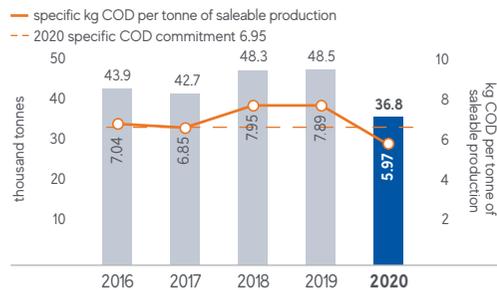


* Included are our pulp and paper mills in Czech Republic, Poland and South Africa

Contact and non-contact water from our pulp and paper mills



COD emissions





Constrained resources and environmental impacts

6 Air emissions

We are committed to minimising impacts resulting from air emissions from our operations. We carefully manage our emissions and invest in modernising our plants using latest technologies to reduce negative impacts from emissions, including those on quality of life for our local communities.

Our recovery, bark and auxiliary boilers and our lime kilns are significant sources of air pollutants, including dust, NO_x, SO₂ and CO₂. In some cases, they emit gases that smell, despite high-efficiency combustion and efficient flue-gas cleaning. This can cause an odour nuisance for people living nearby.

Air emissions associated with the combustion of fuels for energy production remain a challenge for the pulp and paper sector. We are working to reduce these emissions from our production processes. For example, to reduce acidifying pollutants (e.g. SO₂), we have invested in the modernisation of our energy plants. This resulted in an 81% reduction of SO₂ emissions in 2020 (1,059 tonnes SO₂) compared with the 2015 baseline (5,604 tonnes SO₂).

We have reduced ozone depleting substances (ODS) by substituting refrigerants with high ozone depleting potential with environmentally-friendly alternatives and by modernising our cooling equipment. By 2020, we reduced our ODS by 43% (4 tonnes) compared with 2015 (7 tonnes).

NO_x emissions



Air emissions

	2020 performance	2019 performance	2015 performance	% change 2019-2020	% change 2015-2020	Reason for the change
Specific NO _x emissions (per tonne of saleable production)	1.77 kg	1.79 kg	2.05 kg	-1.3%	-13.7%	Investments in recovery and energy boilers (Świecie, Syktyvkar)
Total reduced sulphur (TRS) emissions and malodorous gases	48.2 tonnes	44.0 tonnes	71.1 tonnes	+9.6%	-32.1%	Świecie combusted malodorous gases in the new recovery boiler
SO ₂ emissions	1,059 tonnes	1,276 tonnes	5,604 tonnes	-17.0%	-81.1%	Modernising our energy boilers (Świecie, Štětí, Syktyvkar)
Fine dust emissions	961 tonnes	928 tonnes	1,500 tonnes	+3.5%	-35.9%	Investments in exhaust air purification systems of our energy boilers
Ozone depleting substances (ODS)	4 tonnes	16 tonnes	7 tonnes	-74.4%	-43.2%	Refurbishment of three large chillers in the chemical plant at our Richards Bay mill

We use ISO standards to monitor, analyse and calculate absolute emissions of specific pollutants. We are committed to introducing BAT standards¹⁵ (techniques approved by legislators or regulators for meeting output standards for a particular process) as part of our new investments.

We committed to reduce specific NO_x emissions from our pulp and paper mills by 7.5% compared with a 2015 baseline and achieved a 13.7% reduction compared with 2015. At Mondi Syktyvkar, we have reduced our specific NO_x by 10.2% compared with 2015, as a result of our €135 million investment in new boilers as part of the modernisation of our energy plant.





Constrained resources and environmental impacts

6 Reducing waste and promoting the circular economy

Our goal is zero waste to landfill. We work with partners and invest in initiatives to achieve this and support greater resource efficiency within and beyond our operations.

We work closely with partners such as the WBCSD, WWF, the New Plastics Economy initiative and Cefi to support the transition to a circular economy see [page 82](#).

We strongly support Cefi's call for the EU to place the cascading use of wood principle at the core of its climate and energy policy to ensure the most efficient use of wood and fibre resources. We also work with Cefi and its 4evergreen alliance to lobby for European waste policies that promote paper recovery and improve the flow of recycled fibre into the supply chain.

Managing our waste

Mondi follows a waste hierarchy to avoid waste and recycle and reuse as much as possible. We see landfilling as wasted raw material and we divert unavoidable waste from being landfilled where possible and feasible. We monitor the volume of operational waste (by waste type and waste routes) across all operations.

Hazardous waste represents a direct threat to the environment and any living organism.¹⁶ Hazardous waste can create future liabilities, particularly when deposited in landfills. There are strict laws in most countries on how hazardous wastes must be managed – including storage, treatment, transportation and disposal.

Non-hazardous waste can also have a detrimental environmental impact and may give rise to significant treatment and disposal costs.

Working towards zero waste

We are constantly looking for ways to avoid, reuse or recycle our remaining waste streams as we pursue an ultimate goal of zero waste to landfill. We work with industry partners to explore opportunities for our waste to be used as secondary raw material in production processes. For example, some of our waste ash (e.g. ash from our bark boilers) is used as a secondary raw material in the production of cement and bricks. See our case study on [page 46](#) on how we are avoiding GHG emissions and supplying renewable secondary raw materials to the chemical industry.

We committed to reduce the waste we send to landfill by 7.5% by 2020, compared with the 2015 baseline. In 2020, we reported a 23.1% decrease compared with the previous year and a 25.4% decrease compared with the 2015 baseline.

Where it is not currently possible to reuse or recycle a waste stream, we dispose of it responsibly. Disposal options include: treatment, such as drying and filtration to change its physical status and/or chemical composition; treatment to change hazardous waste into non-hazardous waste; combustion in incineration facilities (e.g. the new bark boiler in Syktyvkar), preferably in combination with energy recovery; and, as the last resort, disposal to landfill. We either dispose of the waste ourselves in accordance with our waste permits, or use reputable waste disposal contractors who provide information on the waste disposal method.

Together we are...
reducing our specific environmental footprint while serving growing markets

At the end of January 2021, we started up the new 300,000 tonne kraft top white machine at Ružomberok (€370 million investment including the pulp mill upgrade commissioned in the second half of 2019). It will enable us to serve the growing markets for innovative and sustainable packaging solutions. This new containerboard grade called kraft top white combines the strength, printability and appearance of a white fresh fibre top layer with the economic and sustainability advantages of a recycled fibre bottom layer. By using the latest technology and a significant amount of recycled paper as a raw material, the machine will reduce the overall specific environmental footprint of the mill.

Bernhard Peschek, Mill Managing Director, Mondi SCP Ružomberok (Slovakia)

ProVantage Smartwhite

Kraft Top White

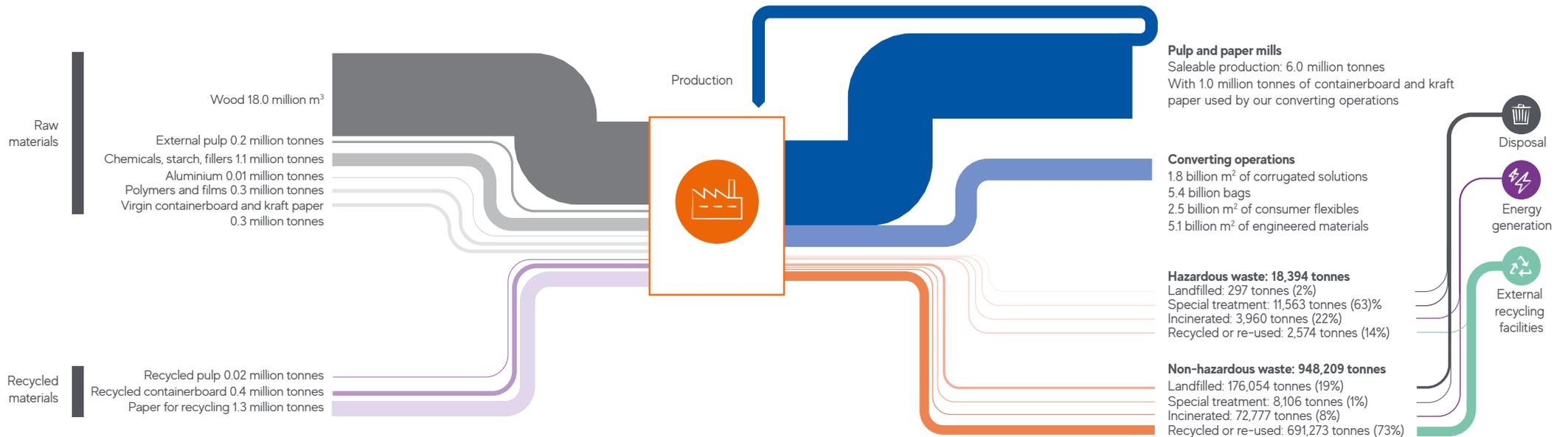
100% recycled **100% fresh fibre**



Constrained resources and environmental impacts

6 Reducing waste and promoting the circular economy

Production to waste balance



Commitment on waste to landfill

	2020 performance	2019 performance	2015 ¹⁷ performance	% change 2019-2020	% change 2015-2020	Reason for the change (2019-2020)
Specific waste to landfill per tonne of saleable production	28.57 kg	37.14 kg	38.28 kg	-23.1%	-25.4%	Re-cultivation of sludge pond in Syktyvkar and increased use of sludge for energy generation
Hazardous waste to landfill	297 tonnes	1,390 tonnes	814 tonnes	-78.6%	-63.5%	
Non-hazardous waste to landfill	176,054 tonnes	227,196 tonnes	229,253 tonnes	-22.5%	-23.2%	

Waste to landfill





Constrained resources and environmental impacts

6 **Managing our impacts**

We strive to be a responsible neighbour and to minimise and eliminate the potential negative impacts of our operations on local communities and the environment. When an impact is identified, we define appropriate mitigating measures to avoid harm to the environment. We record and thoroughly investigate every complaint.

Environmental incidents

Environmental incidents and failure to comply with legal requirements pose a risk to people and the environment. They can also result in fines, damage to our reputation and demotivation of our workforce. In some circumstances, non-compliance can result in costly clean-up obligations and other environmental liabilities.

We are committed to meeting all the requirements and standards set out in our policies and SDMS. We require our operations to comply fully with local and regional environmental laws, regulations and other standards such as site permits.

Environmental incidents mainly arise from accidental releases. We have established management systems and procedures to avoid such incidents. Nearly all environmental incidents are captured in secondary containment, preventing harm to the environment. When a major incident does occur due to unforeseen circumstances or gaps in our internal systems, we thoroughly investigate it, take corrective action to avoid reoccurrence¹⁸ and share lessons learned through our Group environmental managers network.

Complying with regulations

We are committed to regulatory compliance and ensuring our operating sites conform to strict performance parameters. We closely monitor occurrences of non-compliance, including those resulting in monetary penalties and violations of the environmental requirements set out in our SDMS. Incidents of non-compliance are reported following due processes.

In 2020, Mondi reported 82 (2019: 278) non-monetary sanctions for non-compliance with environmental laws and regulations. We paid fines totalling approximately €11,008 involving 6 cases. These cases were related to a leak releasing oil to the river (Štětí, in the Czech Republic, July 2019; €4,401)¹⁹, to exceeding the limits of NOx emission (€879), and to non-compliances with sanitary standards in Syktyvkar (3 fines; totalling €4,475). One fine related to non-compliance with a regulation on hazardous waste transportation in Szada (Hungary, €1,253).

Listening to our stakeholders

Our production processes have the potential to give rise to concerns or grievances from local communities, NGOs and other stakeholders. The complaints we receive primarily relate to odour and noise.

In addition to our formal SpeakOut mechanism, some operations have dedicated telephone lines that connect the complainant directly with the relevant person at the operation. Immission-monitoring stations are also provided at a number of our pulp and paper mills.

All complaints are investigated, reported and corrective actions are defined. The success of the corrective action is verified and where appropriate, the complainant is contacted for follow-up.

[Read more about our stakeholder engagement on page 85](#)

Environmental incidents with impacts outside our boundaries in 2020

Date	Location	Brief summary
25.02	Richards Bay	During a partial mill shut there was a moisture build-up in a gas line, resulting in incomplete combustion of odorous gases and the release of total reduced sulphur gas via the incinerator stack. The incident resulted in 13 odour complaints.
26.03	Richards Bay	During planned maintenance of the lime kiln, there was incomplete combustion of odorous gases. The plant was shut to reduce the impact of odour on the community and investigate further. A total of 33 odour complaints were recorded for this incident.
30.05	Richards Bay	The mill's internal electricity supply to odours gas burning zones failed. The gases vented to atmosphere, resulting in 60 odour complaints.
10.06	Kuopio	About 30 m ³ of fresh water was added to the ammonia water tank. The lines were rinsed with this water. When the lines were emptied of rinsing water, the smell of ammonia was detected at the end of the discharge line. About 1.5 m ³ of ammonia water (24.5%) is estimated to have entered the soil.
01.08	South African forests	Firebreak maintenance was completed using a tractor-drawn mower. The mulching operation impacted on more area than was intended, causing unplanned damage to natural vegetation and some soil disturbance impacts to varying degrees in a 5-10m zone. Our active rehabilitation plan was approved by the iSimangaliso Wetland Park World Heritage Authority and has commenced.
26.10	Syktyvkar	Tall oil stock residues at the plant were identified in an above-ground pipeline, which flowed into a nearby sewage manhole and into the local river. At the concentration levels measured, it is a non-toxic water-insoluble ointment-like malodorous substance.
01.11	Stamboljiski	During our annual maintenance shut, a malodorous gas burner failed. At the same time, due to an increase of pressure in the gas line, the automatic pressure relief was activated. The attempt to close the valve was unsuccessful due to the malfunction of the automatic closure valve, which consequently led to the uncontrolled release of malodorous gas into the atmosphere causing a strong unpleasant odour in the town of Stamboljiski.
16.12	Štětí	The fan transporting weak odorous gases into the recovery boiler for incinerating failed. Odorous gases could not be incinerated and had to be emitted via bypass to the atmosphere. The authorities were proactively informed and no odour complaints were received.

Environmental incidents

	2020	2019	% change 2019-2020
Reports of minor non-compliances	82	278	-70.5%
Major environmental incidents ²⁰	32	35	-8.6%

Environmental complaints

	2020	2019	% change 2019-2020
Total complaints	287	305	-5.9%
Odour complaints	216	225	-4.0%
Noise complaints	66	68	-2.9%
Other complaints	5	12	-58.3%



7 Biodiversity and ecosystems

We believe thriving ecosystems are essential to the future of our planet. We protect and enhance biodiversity and natural capital in our forestry landholdings and around our manufacturing sites. Everything in nature is interconnected and we proactively engage and collaborate beyond our operations to enhance ecosystem stewardship at scale.

Why is this important?

The World Economic Forum's 2020 Global Risk Report¹ places biodiversity loss in the top five global risks. Nature is declining at an unprecedented rate, adversely impacting the ecosystems that we and all other species need to survive.² Reduced biodiversity in forests and other ecosystems means lost opportunities for medicines, food, raw materials and local economic development.³

Together we are...
promoting biodiversity and ecosystem resilience across entire landscapes

What's our impact?

Our commitment to ecosystem stewardship has motivated us to promote Ecological Networks (ENs) and protect high conservation value (HCV) areas with other stakeholders. We set aside and/or manage around one quarter of our landholdings for conservation. We ensure reforestation of all logging sites across our productive forestry landholdings.

We pioneered a landscape approach to ecosystem stewardship in collaboration with WWF and local partners. We have actively promoted best practices in freshwater ecosystem stewardship in South Africa and terrestrial ecosystem stewardship in Russia.

We also co-founded the WWF New Generation Plantations Platform and the WWF Russian Boreal Forest Platform to support the exchange of best practices between national and international forestry stakeholders.

Status reports on the biodiversity and ecosystems of our forestry operations and surroundings of our mills are enabling us to understand our impacts and dependencies and are informing practical actions on the ground.

We have worked with leading companies and organisations, such as WBCSD's Forest Solutions Group and the Natural Capital Impact Group (NCIG) of the Cambridge Institute for Sustainability Leadership (CISL) to develop methods to evaluate material impacts of our industry on biodiversity and natural capital across the value chain.

Our commitment to 2020

Promote ecosystem stewardship in the landscapes where we operate through continued multi-stakeholder collaboration



Our strategic SDGs and targets



- SDG 6 Clean water and sanitation**
- **Target 6.5** Implement integrated water resources management
 - **Target 6.6** Protect and restore water related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes



- SDG 8 Decent work and economic growth**
- **Target 8.4** Improve global resource efficiency and endeavour to decouple economic growth from environmental degradation



- SDG 12 Responsible consumption and production**
- **Target 12.2** Achieve sustainable management and efficient use of natural resources
 - **Target 12.8** By 2030, ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature



- SDG 15 Life on land**
- **Target 15.1** Ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services
 - **Target 15.2** Promote the sustainable management of all types of forests, halt deforestation, restore degraded forests and increase afforestation and reforestation globally
 - **Target 15.5** Reduce the degradation of natural habitats, halt the loss of biodiversity and protect and prevent the extinction of threatened species
 - **Target 15.8** Prevent the introduction and significantly reduce the impact of invasive alien species on land and water ecosystems and control or eradicate the priority species
 - **Target 15.9** Integrate ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts

For links to all other SDGs, see the full [SDG Index](#)

What's next?

We will continue to safeguard biodiversity and water resources within and beyond our operations to promote climate resilience. Through our MAP2030 commitments, we will conduct water stewardship and biodiversity assessments at all our mills and forestry operations by 2025, introducing action plans where necessary. We are exploring ways to define science-based targets for our impacts on nature.



Biodiversity and ecosystems

7 Understanding our biodiversity impacts and dependencies

Our businesses have an impact and are dependent on biodiversity and healthy, functioning ecosystems. Our most significant biodiversity and ecosystems impacts and dependencies occur upstream, in our forestry landscapes.

Managed landholdings

Wood fibre is one of our most important raw materials and we rely on access to sustainable sources. Significant areas of land are required to secure a sustainable wood fibre supply and forestry operations constitute a major part of our management activities. We manage around 2.3 million hectares of natural forestry landholdings in Russia and 254,000 hectares of plantation forestry landholdings in South Africa.⁴

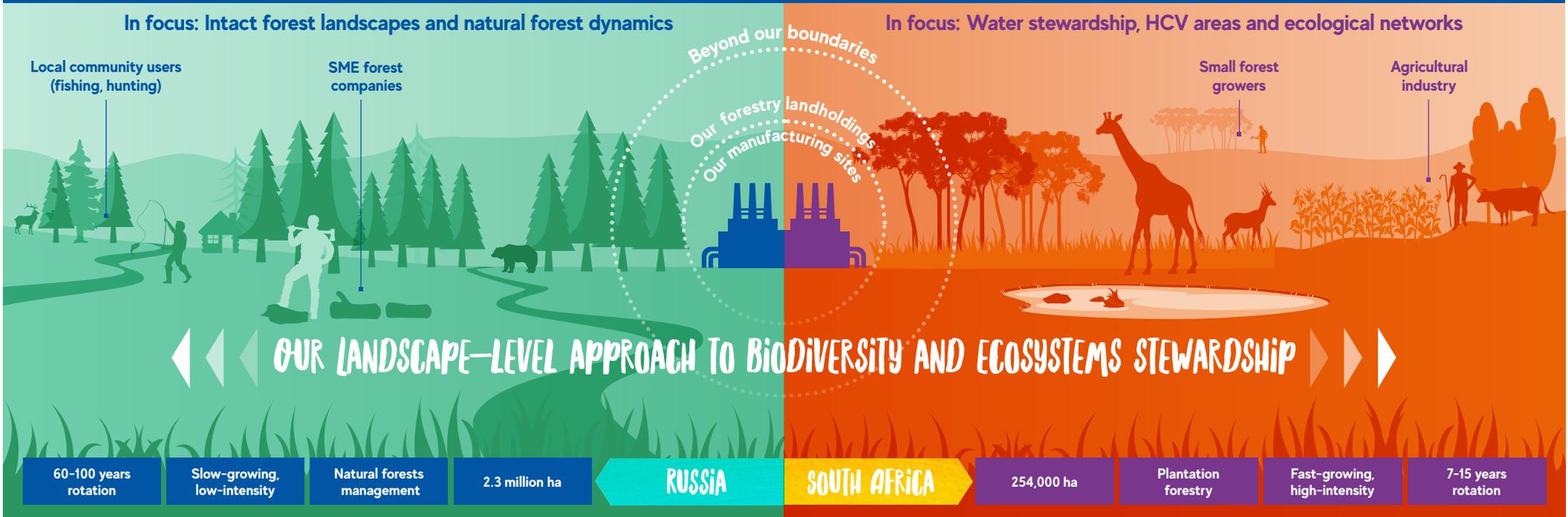
Operational landscapes

The long-term productivity and resilience of production landscapes depend on thriving and resilient terrestrial and freshwater ecosystems and the protection of biodiversity and natural capital. We promote freshwater and terrestrial ecosystem stewardship across forestry landholdings, agriculture farms and other land use types through collaboration with non-governmental organisations, scientific institutions and different land users across the landscapes where we operate.

Products value chain

We aim to evaluate and address biodiversity and ecosystems impacts and dependencies along the entire value chain. This includes exploring ways to link material biodiversity impacts to product footprint assessments. We engage and collaborate with others to enable market-driven transformational change and by offering an expanding choice of sustainable products.

We go beyond the fence because nature does not recognise any boundaries





Biodiversity and ecosystems

7 Ecosystem stewardship in our operations

Forestry operations

When well designed and managed, our forestry landholdings can have significant benefits for biodiversity and ecosystems. We play a leading role in developing robust land management practices to manage and mitigate the impacts of forestry activities and other natural and man-made impacts.

Credible third-party certification is an essential part of our management approach. It assures compliance with internationally recognised standards for responsible forest management (see [page 44](#)).

In 2020 we successfully maintained Forest Stewardship Council™ (FSC™) Forest Management and ISO 14001 certifications in our forestry operations in Russia and South Africa in line with our SD policy requirements.

Our forestry landholdings' management objectives aim to ensure the integrity of natural ecosystems by maintaining and managing ecological networks (ENs) on a local and landscape scale. Well-designed and managed ENs are an essential component of our Sustainable Working Forest model.

The proportion of land managed for conservation purposes varies across different types of landscapes. Around 25% of our forestry landholdings in Russia and South Africa are set aside or managed for conservation. This exceeds the international Aichi Biodiversity Target of at least 17% of terrestrial ecosystems and inland water ecosystems to be conserved by 2020.⁵

Managing impacts from our manufacturing

We started exploring the potential biodiversity and ecosystems impacts and dependencies of our pulp and paper mills in 2015. Following engagement with local stakeholders, we have been working to develop biodiversity status reports for all our pulp and paper mills to describe the ecosystems surrounding our operations.

The status reports will be used as a basis for developing biodiversity action plans where needed. Creating a baseline inventory of biodiversity and ecosystems in the vicinity of our pulp and paper mills is a fundamental step towards assessing the biodiversity impacts of our operations. We identified important biodiversity sites, including protected areas, valuable habitats, Important Bird Areas (IBAs), key biodiversity areas (KBAs), Natura 2000 designated sites and the IUCN Red List of Threatened Species around our operations. We considered the direct impacts in a radius of 10 km around our mills as well as sources of pollution nearby.⁶

Our aim is to have conducted biodiversity and water stewardship assessments of all our mills and forestry operations by 2025, and to implement required actions where necessary.

Together we are...
managing the biodiversity impacts of our Syktyvkar mill in Russia

We've been working with the Institute of Biology at Komi Science Centre to assess the long-term impacts of our mill on the biodiversity of the surrounding area. The assessment covered 20 years of results from monitoring coniferous forest stands and field and laboratory studies on the ecological status of terrestrial and freshwater ecosystems. Next, we will identify rare plant, lichen and animal species and habitats in the areas for assessment and monitoring. We'll use the outcomes to zone the area according to the degree of biodiversity and ecosystems transformation that has occurred.

We will also develop a biodiversity database and maps of sensitive habitats and species using Geographic Information System (GIS). This will enable us to monitor changes in the state of freshwater and terrestrial ecosystems resulting from our activities. All of this will be invaluable in shaping our internal guidelines on how to define habitats and implement proactive conservation measures to reduce biodiversity impacts.

Dimitry Ocheretenko, Chief Environmental Manager, Mondri Syktyvkar

High Conservation Value areas and Ecological Networks are essential for sustainable working forests



@Sergey Gordeev



@James Pryke

[Read more on how we monitor our nature conservation network in Russia](#)

[Discover online how we monitor functionality of our ecological networks in South Africa](#)





Biodiversity and ecosystems

Promoting ecosystem stewardship across landscapes

We go beyond the boundaries of our operations and landholdings to promote sustainable stewardship of freshwater and terrestrial ecosystems by other land users. Our long-term partnerships in Russia and South Africa bring land users and other stakeholders together to identify shared challenges and develop meaningful landscape-scale solutions.

Promoting stewardship of freshwater ecosystems

In Russia, we support local fishing communities who are vulnerable to declining fish resources in rivers. In 2020, Mondi supported the Silver Taiga Foundation’s work to publish an [overview](#) of ten years of historic information and statistical data on the Mezen river fish resources and human impacts, collected as part of the Model River Mezen project. The Russian-language publication includes practical recommendations for the sustainable management of the river basin. Silver Taiga Foundation shares learnings with other settlements of large river basins in southern Komi through the Model River newspaper.

[Read online how we support restoration of valuable fish resources in Russia](#)

In South Africa, we work with WWF South Africa to promote best practice in water stewardship with local farmers including sugarcane, citrus and macadamia growers, as well as with livestock farmers. An example of successful catchment-wide implementation of water stewardship practices is the [uMhlathuze Water Stewardship Partnership](#). This collaboration between business, government and civil society was established with the support of the WWF-Mondi Water Stewardship Partnership to address water security challenges facing the region.

[Discover online how we promote water stewardship to local farmers in South Africa](#)

Promoting stewardship of terrestrial ecosystems

Russia has vast areas of Intact Forest Landscapes (IFLs) that have not been significantly altered by human development. They play a crucial role in carbon storage and provide a unique opportunity in the world for large-scale conservation.⁷ We are committed to protecting areas of high biodiversity importance and high conservation value in Russia, which do not have official protection status and are under threat.

In 2020, in collaboration with WWF Russia and Silver Taiga Foundation we developed and tested a regional methodology to identify and verify rare ecosystems in Komi Republic. We also published an overview of practical nature conservation approaches in boreal forests – from landscape scale to the level of logging sites. These [guidelines](#) are in Russian language and will help other forest companies in the region to enhance their nature conservation practices.

[Learn how we protect valuable boreal ecosystems and species in Russia](#)

Together, we are...
developing landscape approaches to ecosystems stewardship

For the past seven years, in partnership with WWF South Africa, we promoted ecosystem stewardship beyond our own forestry landholdings using a landscape approach pioneered by WWF, Mondi and other key partners in the South African uMhlathuze catchment. Our WWF-Mondi Water Stewardship Partnership included the development of the Monitoring, Evaluation and Learning (MEL) tool. This vital adaptive management tool improves project and outcomes monitoring while enabling a structured way to reflect on and implement learnings. It has the potential to be replicated by landscape-level partnerships in other regions in South Africa, as well as other countries.

Brent Corcoran, Certification & Environmental Manager – Forestry, Mondi South Africa

@David Styles

In South Africa, we continue to promote the management of ecological networks (ENs) on our forestry landholdings. The findings from our research partnership with Stellenbosch University, with some local adaptation, could be applied to other land use types and commodities in South Africa and could also be applied to plantation forestry and agricultural landscapes elsewhere in the world.

We support the work of the New Generation Plantations (NGP). The NGP principles include maintaining high conservation values and

ecological integrity in plantation forestry landscapes. Based on our research with Stellenbosch University, we believe that well-designed and managed ecological networks are a critical precondition to ensure sustainable and resilient ecosystems in plantation forestry and other intensively managed landscapes. The results of the implementation of the WWF-MWSP and NGP approaches in South Africa were communicated at the Austrian World Summit 2020 as a part of the [Climate Action Stories](#).

[Read online how we promote ecological networks through our NGP-IUFRO cooperation](#)



Biodiversity and ecosystems

7 Exploring the impacts of our products

Developing biodiversity metrics to assess the impacts of products and value chains is a relatively new and complex area of focus. Many of our products are produced using wood fibre sourced from a wide range of geographies and forest types. This makes it difficult to develop a consistent approach to assessing their biodiversity impacts.

A number of emerging global frameworks offer methods of biodiversity and natural capital accounting. We have joined the EU Business @ Biodiversity Platform, which helps companies explore available frameworks and understand their applicability for different purposes. As a member of the WBCSD, we have contributed to a global team of experts working to develop initial guidance for business on **setting up science-based targets for nature**.

Typically, life cycle assessments consider land use metrics as a key parameter because the extent and type of land use determine the impacts on wildlife habitat and biodiversity. Generally, these land use metrics focus on land transformation and land occupation.

As a minimum, our managed forests and external wood fibre sources are not associated with any form of deforestation or illegal logging. We do not carry out forestry in the tropics and we do not use tropical species or those listed by the Convention on International Trade of Endangered Species (CITES). We also do not use wood fibre from genetically modified trees.

Land transformation (land use change):

Deforestation (permanent tree cover loss) leads to the most significant loss of biodiversity dependent on forests. Wood fibre sourced from sustainable forestry landholdings does not result in deforestation and there is no change of land use from “forest” to “non-forest”. We are committed to a deforestation-free wood fibre supply chain. In addition to the evaluation of “forest – non-forest” land use change, together with an external consultant we investigated more specific land use change within forest land use types, based on official FAO statistics for the last 20 years. We focused on the decrease of primary forests due to the expansion of managed forests and assessed our main wood sourcing countries. Negative land use change was identified only in Russia, however, not in the Komi Republic where we operate.



Land occupation (land use):

Any management activity on land that changes its natural state is deemed a pressure. Choosing pristine state as a baseline is a “golden rule”, but not practical at scale because this implies abandoning forest management and preserving all land for conservation. We believe a more workable approach is to choose a practical baseline state from a reasonably recent time in the past and to ensure that there is no decline in the key forestry parameters. Sustainable working forests ensure that continuous forest growth cycles are maintained, harvesting does not exceed growth, logging sites are regenerated and protected, and ecological networks maintain critical biodiversity. This represents a sustainable bioeconomy.

Read about how we measure the impacts of our products with our life cycle assessment tool on [page 80](#).





8 Supplier conduct and responsible procurement

We are committed to the highest standards of supply chain transparency. We apply insights and create partnerships to achieve impact and scale, applying a risk-based approach to take action where it's most needed. This enables us to manage risk more effectively, safeguard the environment and protect labour and human rights for workers in our supply chain.

Why is this important?

In our globally connected economy, supply chain transparency has become a priority for responsible business. It is a complex challenge that requires cooperation across the value chain. Our impacts occur upstream and downstream of our operations and our stakeholders want increasingly detailed information about how we manage our supply chain risks.

What's our impact?

Increasing the visibility of our suppliers' sustainability performance and implementing risk mitigation measures has been a key priority for the last five years. We have taken important steps to achieve it, but the complexity, scale, diversity and global nature of our supply chain means that change will take time. We recognise what's at stake – the wellbeing of workers and communities across our value chain and the health and resilience of the ecosystems that business and livelihoods rely upon.

Developing our Responsible Procurement process was key in our supply chain sustainability journey. We put in place a new risk screening and supplier evaluation tool, which has been used to screen more than 2,000 key suppliers over the last two years. These are our Group suppliers, selected for the screening process due to the data being centrally available, and also because they represent larger, strategic spend areas, and supply to multiple Mondi sites.

Addressing the requirements of the UK Modern Slavery Act has helped us address human rights gaps in policies and practices across our operations and supply chain. We continue to develop our human rights approach in collaboration with internal and external stakeholders.

All of this has made us more informed, transparent and collaborative, and better prepared to mitigate risk and realise opportunities as we transition to our 2030 supply chain targets.

Our commitment to 2020

Encourage supply chain transparency and promote fair working conditions with our key suppliers



2016	2017	2018	2019	2020

Our strategic SDGs and target



SDG 8 Decent work and economic growth
 – Target 8.7 Eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour

For links to all other SDGs, see the full [SDG Index](#)

What's next?

We plan to continue to improve and expand the scope of our responsible procurement activities and aim for more efficiency and transparency in our practices. We have introduced a supplier risk ratio as part of MAP2030, and will use it to reduce risk through screening an increasing number of suppliers, and mitigating residual risk by collaborating with and developing our suppliers.

Together we are...
 working to make our global supply chain responsible and transparent





8

Supplier conduct and responsible procurement

Understanding our global supply chain

Our global supply chain is crucial to sustainable business growth; it includes more than 13,000 suppliers¹ in 67 countries. Working collaboratively via a risk-based approach enables us to support meaningful change across issues like labour rights, carbon emissions and water stewardship.

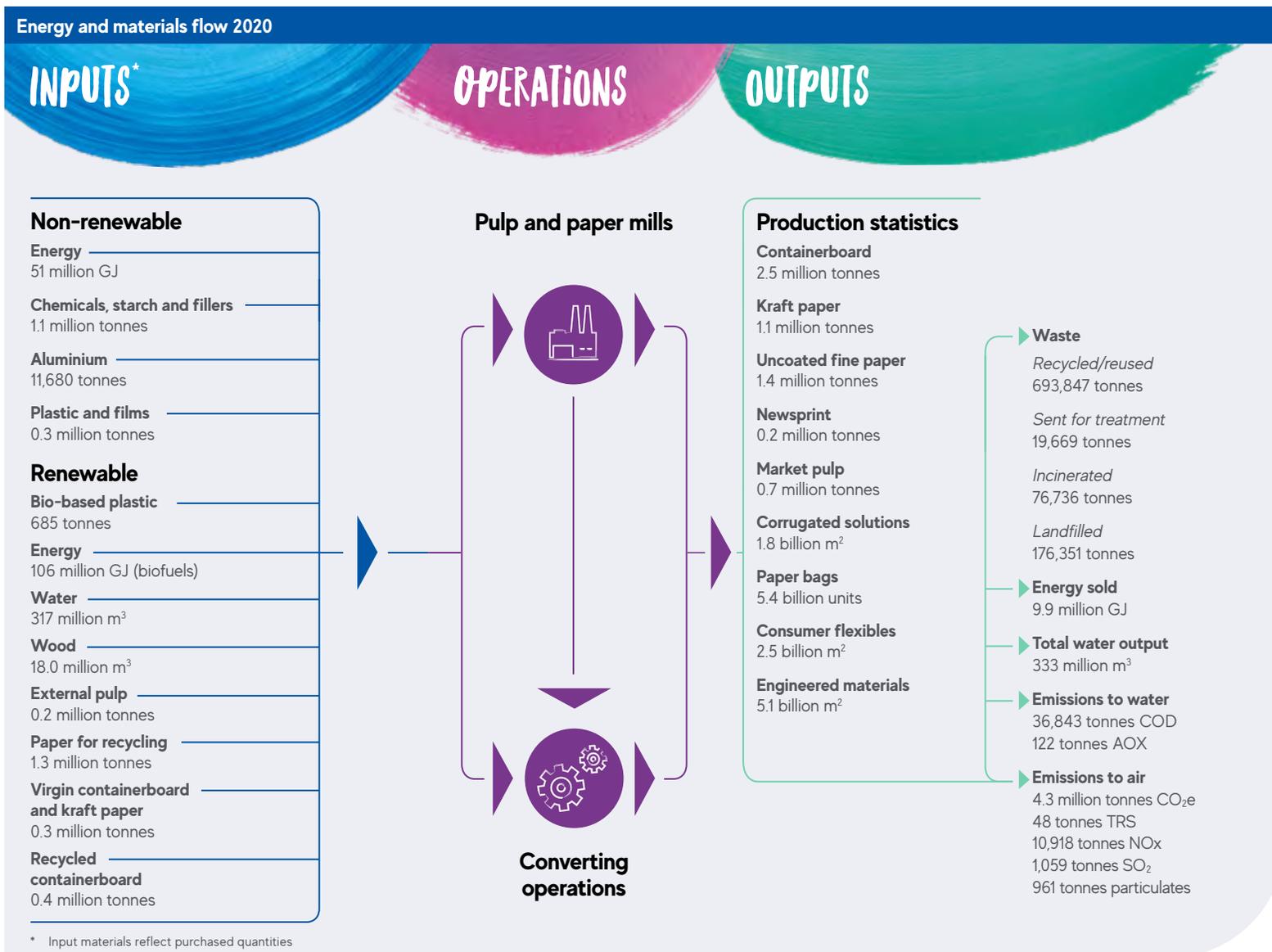
We identify sustainability risks and assess supplier performance to improve transparency, minimise risk to the business and meet stakeholder expectations (see page 69). Our approach supports our response to the UK Modern Slavery Act and similar legal requirements in other jurisdictions.

As suppliers shift production to emerging markets, it is crucial that we manage our risks in countries that have potentially weaker governance of sustainable development. We follow a practical, risk-based global approach when engaging with our 2,000 key suppliers² and smaller, regional suppliers. Our central procurement function manages a number of key spend categories and the remainder are managed regionally or locally.

In 2020, we procured €5.1 billion worth of goods and services from our suppliers (2019: €5.5 billion). Products and services purchased locally³ represented 58% of our overall spend in 2020 (2019: 55%).

We received a score of A in CDP's 2020 Supplier Engagement Rating.

[Read more here www.cdp.net](http://www.cdp.net)





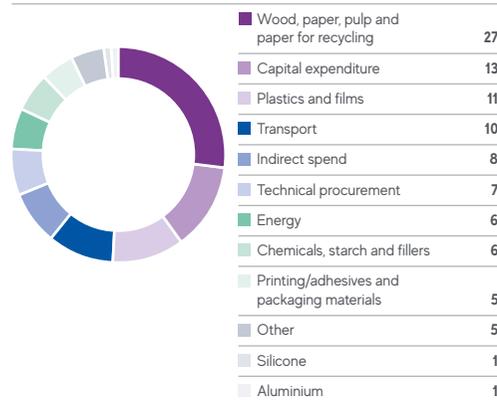
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Supplier conduct and responsible procurement

Key areas of spend and major procurement categories

We use renewable and non-renewable materials in our products. Based on revenue, about 80% of our business is fibre-based. We depend on natural resources and ecosystems and responsible procurement is central to our sustainable approach.

Breakdown of supply spend (%)



Key areas of spend and major procurement categories

Wood and pulp	Wood fibre is one of our primary raw materials. We procure it from sustainable sources through a transparent supply chain that is assured by forest and Chain-of-Custody (CoC) certification, controlled wood and our DDMS. We source locally for the majority of our fibre needs. Read more on page 42 .
Plastic and films	Plastic sourcing includes different types of polymers, films and fabrics. Our Group procurement team is responsible for strategic sourcing projects and negotiations with Group plastic suppliers. Together with our suppliers, we aim to source material which is suitable for downgauging, lightweighting, compostability and recycling.
Chemicals, starch and fillers	We use starch, fillers and chemicals in combination with other materials to manufacture high-performance paper and packaging. We source chemicals through a number of large companies and local suppliers close to our operations. The majority are based in Europe with subsidiaries in Asia, Middle East and the US.
Transport and logistics	We use rail, combined rail-road, road and sea freight solutions to transport our supplies and products. We monitor indirect CO ₂ emissions (Scope 3 emissions) arising from our supply chain, of which transport – both upstream and downstream – is a significant contributor.



Together we are...
keeping our supply chain agile in response to the pandemic

Many of our products are considered essential and our ability to secure raw materials during the pandemic is crucial to continue serving consumers. With COVID-19 disrupting global supply chains, we saw the benefit of a procurement team that's been trained to develop lean and agile processes. One challenge was the increased market demand for films, resins and solvents. This market supplies raw materials for producing products such as personal protective equipment (PPE), hygiene components and food packaging. To manage the risk to our supply chain, our global network of procurement teams worked together and maintained close and effective communication with suppliers. Central category managers and local buyers

collaborated in new and creative ways to optimise stock and manage potential disruptions. We shifted raw materials between operations to meet short-term increases in customer orders. At the same time, we made onboarding new suppliers more efficient and identified vulnerable and at-risk suppliers. Our central procurement market intelligence team carried out supplier liquidity screening and shared the results with procurement teams.



8

Supplier conduct and responsible procurement

Managing risks and increasing transparency

We are committed to mitigating supply chain sustainability risks for our business and stakeholders along the entire value chain. To achieve this, we continue to roll out our Responsible Procurement process to key suppliers in specific categories.

Our procurement teams are trained on how to engage with suppliers to achieve our objectives. We begin by sharing our sustainability values through the Code of Conduct for Suppliers (see page 70). High-risk suppliers identified through our screening process go through an evaluation, which leads to further measures where necessary.



Due diligence for fibre-based products

Wood and pulp procurement follow a different risk assessment process than our Responsible Procurement. These are risk-assessed through a dedicated DDMS, which ensures that we and our customers can be confident that our fibre is sustainably harvested or purchased from sustainable sources (see page 43).

We apply due diligence in our procurement practices as prescribed by our Responsible Procurement process. This aims to ensure a consistent process for the selection, evaluation, onboarding and monitoring of suppliers based on their sustainability risk and performance. The process is run by the Group procurement function and supported by Group sustainable development. It uses a risk-based approach to assess suppliers against the requirements of our Code of Conduct for Suppliers. The Code is part of our contractual agreement with all new suppliers. Moving forward, existing suppliers will be selected via risk assessment to be periodically reviewed.

Our risk-based approach

We take a targeted, risk-based approach to managing our supply chain. We have developed risk rating and risk assessment procedures for our procurement categories based on criteria including the nature of products and location of operations. Sourcing from countries with weaker governance can increase the risk of labour and human rights violations, weaker regulation of environmental practices and waste disposal, and controversial sourcing of raw materials. Other risks are inherent in the nature and production of a product or service – for example, the risk of illegal logging in the wood fibre supply chain. We consider these risks when we determine the overall risk for each category, making use of credible third-party risk ranking data.

Our initial screening tool is designed to give Mondi an indication of which suppliers are high-risk in one or more of three areas: labour and human rights; environment and climate change; and water stress.

Together, we are...
collaborating to supply face masks and PPE to our employees

In early 2020, we were faced with the challenge of getting face masks to our frontline employees quickly and safely. With the global lockdown causing transport delays, export restrictions and a dramatic reduction in air transport capacity, our safety and health and procurement teams sprang into action. We turned the Group office in Vienna into a distribution centre. With supplies secured, distributing masks and PPE, thermometers, sanitary equipment and other essential goods took place steadily to all Mondi plants where local laws and regulations allowed us to import products. This meant our people could continue to work safely and efficiently, with the right protection.

We digitalised our Responsible Procurement assessment in 2020 using our digital e-sourcing platform used for tender processes. Questionnaires are now shared via the digital platform and supplier responses are handled and tracked through it. This has made our supplier interactions more efficient, transparent and auditable.

We send a questionnaire to high-risk suppliers including one or more of the following five modules:

General – external assessment and management systems, raw material sourcing, compliance, environmental topics and community impacts. This module is sent to all high-risk suppliers

Labour – human rights and working conditions/employment aspects

Climate change – emission figures, transparency approach, public targets, carbon tax schemes and climate risk

Biodiversity – ecosystem and natural capital impacts, reporting and management

Water – water management for water-intensive suppliers or those operating in water-scarce areas, including consumption and emissions processes.

Modes of transport (%)





Supplier conduct and responsible procurement

8 Managing risks and increasing transparency

Code of Conduct for Suppliers

Our Code of Conduct for Suppliers covers social, environmental, governance, legal and ethical issues. All our companies and business units worldwide, including joint ventures where we have a controlling interest, are required to apply this Code as a minimum standard to their suppliers of goods and services, irrespective of the jurisdiction in which they operate and the laws applicable to the jurisdiction. Where we have a non-controlling interest, we encourage the application of the Code with our business partners. We also encourage our suppliers to apply similar requirements for their own suppliers.

In 2020, we updated the Code to make it easier to understand and comply with, and to assist us to enforce it among our suppliers.

We also updated our General Terms and Conditions. We added a provision to encourage suppliers to use SpeakOut to raise concerns about any potential infringement of EU law and included a stipulation regarding compliance with Mondi's General Supplier Quality Requirements and Code of Conduct for Suppliers. The Code is available in English, German, Polish, Czech, Turkish and Russian on our website.

Supplier quality management

Our Supplier Quality Management involves a set of processes to ensure our suppliers meet our quality and sustainability expectations throughout the life cycle. These include supplier risk management, non-conformity management, supplier evaluation, and supplier audits.

The risk management process covers financial and supply chain risks as well as sustainability and human rights issues. Through supplier evaluation, we assess supplier performance annually and drive improvements.

Supplier audits

Following an assessment of our practices in 2019, we improved our systems and approach in 2020. We have developed a common supplier auditing process and standard operating procedure for use by all our operations. The new centrally aligned supplier audit programme will provide transparency over audits as well as standardised audit reports, self-assessment tools and other documentation. The redesigned audit questionnaire accommodates the new requirements of our Responsible Procurement process. We provided training on this during 2020 at our Korneuburg operation (Austria) for colleagues representing four plants, with the other trainings moved online due to the pandemic.

Upholding human rights in our supply chain

Our human rights risks can arise at any point in the value chain through our business impacts, relationships and suppliers. Understanding and managing our potential human rights impacts enables us to reduce the risks to our business, customers and supply chain.

We are strengthening our monitoring and reporting of potential issues in our operations and supply chain, embedding labour and human rights risks into our Responsible Procurement process.

UK Modern Slavery Act

We comply with the UK Modern Slavery Act, which addresses the crimes of holding another person in slavery, servitude, forced or compulsory labour, or trafficking a person.

Our latest statement, published in 2020, details progress made in 2019 in identifying and managing potential human rights risks including modern slavery and human trafficking. For this statement, we improved the structure, visuals and layout of our reporting to make the statement more accessible to different stakeholders. The statement reflected progress made through continued work on our Responsible Procurement programme including: key supplier risk screening and assessment; developing our internal human rights due diligence processes in collaboration with the Danish Institute for Human Rights (DIHR); and training for procurement teams and relevant employees.

We continue to make progress in our response to the Modern Slavery transparency and performance requirements. Our employee database and reporting platform will provide metrics related to human rights aspects in our operations to help shed light on gaps and risks. Through our Responsible Procurement process, we are taking steps to address suppliers with high labour and human rights risk exposure or potential non-compliance with our Code of Conduct. Based on input from DIHR, we will be working with internal and external stakeholders to strengthen our human rights due diligence, impact assessment and governance, including the identification of potential and actual gaps in our procurement practices (read more on [page 36](#)).

Responsible Procurement in 2020 in figures

Risk screening

1,061 key suppliers (the remaining 50% of all key suppliers) located across 1,525 different sites.

Supplier questionnaire

7% of supplier sites were assessed as high-risk and, with 4% de-escalated, 3% were requested to fill in a supplier questionnaire.

Evaluation and follow-up

Based on the results of the questionnaire, and after the follow-up steps, a further 1.7% were de-escalated and 1.3% remained at high risk⁴. We continue to engage with the respective suppliers to understand their responses to the supplier questionnaire and to obtain further relevant information related to the area of risk identified.

Tracking and monitoring

For non-responsive and other high-risk suppliers, we have identified escalation steps. They include supplier meetings, audits, third-party ESG reports and, if required, termination of the supplier relationship.





9 Relationships with communities

As a global company employing around 26,000 people, we support local livelihoods and have invested €50 million in local initiatives in the past five years. Many of our operations stepped up to support the local response to the pandemic.

Why is this important?

Our businesses are far more likely to succeed when they are part of healthy, prosperous and dynamic communities. Engaging openly helps us respond to potential conflicts and support local sustainable development. Working in partnership is crucial to leveraging our positive societal impacts locally and globally.

What's our impact?

As a major local employer and tax payer in many of our locations, engaging and investing in the communities in which we operate has always been important. Our impact assessment and engagement tools, including our in-depth Socio-economic Assessment Toolbox (SEAT), are invaluable in allowing us to deep-dive into local contexts and understand stakeholder views.

We have conducted five SEATs since 2015 in South Africa, Russia, Austria, Sweden and Poland, with SEATs in Czech Republic and Turkey delayed in 2020 due to the pandemic. They have provided us with crucial insights and our stakeholders with a credible platform through which to engage with our operations.

Our investments in education, health, enterprise and infrastructure – totalling €50 million since 2016 – have increasingly moved from cash donations to strategic collaborations. We have developed local multi-stakeholder projects involving communities, NGOs, government and other stakeholders around our largest mills and forestry operations.

Our commitment to 2020

Enhance social value in our communities through effective stakeholder engagement and meaningful social investments



5-year performance



Our strategic SDGs and targets



- SDG 8 Decent work and economic growth**
- **Target 8.3** Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalisation and growth of enterprises
 - **Target 8.5** Achieve full and productive employment and decent work for all women and men, and equal pay for work of equal value
 - **Target 8.6** Substantially reduce the proportion of youth not in employment, education or training



- SDG 9 Industry, innovation and infrastructure**
- **Target 9.1** Develop quality, reliable, sustainable and resilient infrastructure, to support economic development and human wellbeing
 - **Target 9.3** Increase the access of small-scale industrial and other enterprises to financial services, and their integration into value chains and markets

For links to all other SDGs, see the full [SDG Index](#)

Together we are...
building strong relationships with communities and aiming to be a good neighbour



What's next?

As soon as it is safe to do so, we will resume our scheduled SEAT assessments at our Tire mill (Turkey) and Štětí mill (Czech Republic). We will continue to look for opportunities to support communities where we operate to cope with the ongoing impacts of the pandemic.



Relationships with communities

9 Understanding our local communities

We support local livelihoods and businesses and aim to build strong proactive and trusting relationships with stakeholders. Understanding our social, environmental and economic impacts on local communities is crucial to identify opportunities and mitigate potentially negative impacts.

Who are our local stakeholders?

We focus our community engagement, investments and initiatives on the people who live adjacent to our operations, on or around our landholdings and within our zone of influence.

[Read more about where we operate page 12](#)

Our socio-economic impact

Depending on their size, Mondi's operations potentially have a significant socio-economic impact on surrounding communities. Our management approach is based on understanding our social, environmental and economic impacts on local communities – be they positive or negative, actual or potential, short- or long-term, direct or indirect, and intended or unintended. We regularly improve our understanding through impact assessments, monitoring and reporting. Our environmental and social management systems ensure we operate legally, inclusively and responsibly and mitigate potentially negative impacts on local communities.



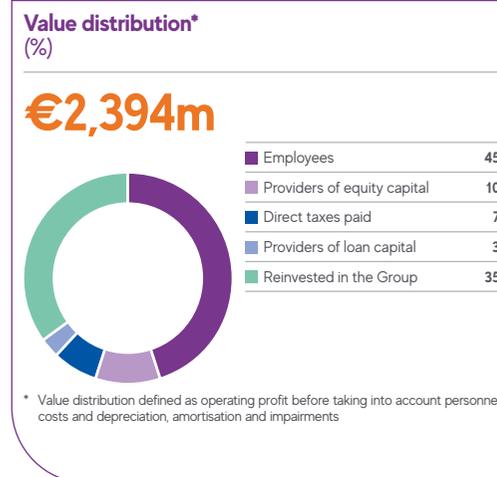
Our pulp and paper mills and forestry operations¹ are generally larger, employ more people and have a higher social and environmental footprint than our converting operations. Potential negative impacts may include: environmental incidents and nuisances such as odour and noise; waste and emissions; land use impacts and natural resource consumption; and job losses due to restructuring or closure of the mills.

As well as direct employment, we support local livelihoods through indirect employment and business opportunities. Some of our operations are in remote regions where there can be high levels of unemployment and limited access to jobs and infrastructure. Mondi is a key employer in some of these areas and an important investor in infrastructure.

We invest in improving local infrastructure and in voluntary social investments that target health, education, infrastructure and enterprise. Wherever possible, we deliver our investments and initiatives in partnership.

We support local development indirectly by paying local and regional taxes. In 2020, our direct taxes paid totalled €168 million, or 7% of our total value distributed. This year, we are reporting on our tax approach and governance (see [page 76](#)).

Our value distribution chart (opposite) shows our payments to different stakeholder groups including employees, shareholders and governments, as well as assets reinvested in the company.



Assessing impact

We use impact assessment tools to understand our relationships with, and impacts on, local communities. They include the SEAT and outcomes from ongoing stakeholder engagement. Direct outputs include SEAT reports, action plans and Community Engagement Plans (CEPs). Other engagement processes include targeted stakeholder surveys, impact assessments, social and environmental due diligence processes and direct engagement with local stakeholders. These inform and enable us to target our community development programmes, investments, initiatives and community forums.

Various committees and functions – such as works councils, safety and health committees and others – support our response to local impact assessments and engagement. To improve our performance, we report on our approach and measure, where possible, the inputs, outputs and impacts of our investments.



Relationships with communities

9 Understanding our local communities

Stakeholder consultation using SEAT

Our SEAT approach supports mills and forestry operations to create open and transparent dialogue with communities. Facilitated by an independent third party, SEAT assessments are carried out via meetings and provide opportunities for stakeholders to speak openly to a panel of Group and local management and a third-party facilitator. Third-party involvement brings neutrality, expertise, transparency and credibility to the process. Mondi management can be excluded from meetings to ensure stakeholders feel comfortable to give feedback. We share our response via a SEAT report, published in English and the local language and accessible to all stakeholders. Infrastructure projects and investments in our Russian and South African forestry operations are examples of action taken in response to SEAT assessments.



We have carried out five SEAT assessments across our operations since 2015. 12 of our 14 key operations (including mills and forestry operations) have completed a SEAT assessment at least once.

[View our SEAT reports](#)

In 2020, we completed two SEAT reports with details of the reviews conducted in 2019 for our Dynäs mill (Sweden) and our Świecie mill (Poland). We postponed scheduled assessments at our Tire and Štětí mills due to the COVID-19 pandemic. They will be carried out when it is deemed safe to do so.

Community Engagement Plans (CEPs)

In relevant locations, SEAT assessments can be used to inform annual CEPs. They set out topics, stakeholders and engagement activities to be undertaken by our operations. Due to potential inconsistencies in approach, we do not report the percentage of our operations that have a CEP in place.

Feedback and grievance mechanisms

We make formal grievance mechanisms available to employees and the public to ensure we are aware of and can respond promptly and effectively to issues. These include local hotlines and our Group-wide whistleblowing system, SpeakOut (see [page 91](#)).

Respecting indigenous rights

We must protect the cultural heritage of indigenous communities, particularly in our forestry areas. We respect the rights of indigenous people and, where relevant, cooperate with stakeholders to address historical injustices that pre-date our involvement in an area. We had no reports of any violation by our operations of the rights of indigenous people in 2020.

Supporting indigenous people in Russia

Respecting the rights of local communities living on and around our leased forestry land in Komi Republic (Russia) is embedded in our forest management practices and certification standards. We support social and cultural movements of local people. This includes our collaboration with 'Komi Voytyr', the public movement of the indigenous people in Komi. In line with certification standards, we preserve areas of forestry land that are important to local communities' traditional way of life.

Land reform in South Africa

Portions of our landholdings in South Africa are subject to land claims under the Restitution of Land Rights Act. We cooperate with government around the settlement of land claims affecting our land. Following a successful land claim model and process, communities gain ownership of the land and can derive a sustainable income from it. We support land claim beneficiaries post-settlement so that they gain meaningful, sustainable benefits. We also work with them to ensure the fibre they produce continues to be sustainably managed to retain credible certification.

Our baseline for reporting progress in settling these claims is 66 claims covering 112,726 hectares of our owned land. This baseline relates to claims received during the first window of opportunity opened by the government in 1998 to lodge claims. By the end of 2020, we had settled 21 out of 66 claims, covering approximately 37,182 hectares. We continue to work with stakeholders to settle the remaining 45 claims², covering 75,545 hectares. Of these, 28 claims covering 39,214 hectares have been gazetted by the State.

2020 Land reform status

- 33% of land settled to date³
- Three claims were de-gazetted, one new claim was gazetted, and one claim moved from pre-gazette to gazette stage during 2020
- 40% of our owned land under claims to date⁴





Relationships with communities

9 Investing in communities

We use our resources to enhance social value by making meaningful investments in local communities. To scale our impact, we collaborate with others to share resources, know-how and skills. In 2020, we shifted our focus towards supporting interventions critical to the COVID-19 pandemic response.

The majority of our initiatives promote education, health, employment and enterprise support, or support local infrastructure and community development. Our voluntary investments go beyond monetary contributions; we create value by Mondi employees giving their time and expertise and sharing our core skills, networks and influence.

In 2020, many of our operations supported the local COVID-19 response. We donated thousands of masks, PPE, medical and surgical raw materials to local municipalities, health facilities and local organisations. Several of our larger operations provided one-time financial support for clinics, hospitals and governments, including €3.3 million in Russia, Poland and Slovakia. We enhanced health infrastructure and capacity, such as our mobile clinics in South Africa and the polyclinic at Mondi Syktyvkar (Russia). Across many communities, we supported public health information campaigns and initiatives to protect health workers, contractors and others, including with COVID-19 testing. For example, Mondi Štětí set up a COVID-19 testing centre in front of the mill during the summer, with 16,000 people tested and approximately 80% of these from the community.

Our operations helped meet wider community needs beyond the frontline health response. Our Ružomberok mill (Slovakia) donated 2,000 packages of office paper to The Central Military Hospital Ružomberok to support mass testing. In South Africa, we installed additional water tanks in our remote communities in order to increase fresh water supply, donated food parcels to over 2,250 vulnerable families and supported sustainable food gardens through funding and training. We also provided Maths and Science study books to 120 schools to support schooling during the crisis.

Many operations donated paper and computers to schools and families to support home education. Mondi Štětí also supported the local fire brigade through provision of food and PPE, while Mondi Tire donated food parcels to families and contractors in need. In South Africa, Mondi Zimele intensified support for small businesses to enable them to remain operational, sustaining 174 permanent and 75 temporary jobs to date.

Maintaining core businesses' activities was another key way we supported communities. Mondi Syktyvkar continued to supply power, waste water treatment and district heating services to surrounding towns, and Mondi Ružomberok supplied power and waste disposal. Mondi Štětí prioritised procurement from local suppliers while Mondi Neusiedler (Austria) continued to provide summer jobs to local people. In Poland, Mondi Świecie provided heat to the local swimming pool and wastewater treatment to the community.

Development focus areas

Our commitment to empowering communities is brought to life through practical support and assistance in the areas where we believe we can make the greatest difference.

Education

We support educational programmes with a focus on science, technology, engineering and maths (STEM) education. Attracting new employees can be a challenge in rural locations and competition for talent is high. Our mills engage and collaborate with schools and educational institutions to create a healthy flow of future talent.

'Project Regiochem' at our Ružomberok mill promotes science and chemistry education to school pupils aged 13 to 15. The project involves an annual competition which aims to inspire pupils to go on to study science and work in technical fields in future. Mondi Świecie has been supporting educational institutes with a focus on STEM for many years. The mill works in partnership with local technical schools and contributes through funding labs and educational aid and by providing teachers.

Our Stambolijski mill (Bulgaria) supports the Electrical Vocational school in Plovdiv, which in 2020 helped its participation in a national project aimed at creating STEM environments in schools.

In South Africa, we partnered with Ligbron Academy of Technology to address STEM educational gaps in rural communities by providing e-learning facilities in four high schools. The aim is to improve the quality and accessibility of teaching, especially in STEM topics, to bridge the digital divide between rural and urban schools.

We have invested €50 million in local community initiatives since 2016, including employee time and gifts in kind. In 2020, we supported a wide range of outcomes including: improving communities' prospects; securing our supply chain; strengthening local relationships; and building trust in the Mondi brand.





Relationships with communities

9 Investing in communities

Health

Public health provision can be a challenge in some remote communities and improving the health of our workforce and local communities is an important part of our community strategy. This need came to the fore in 2020 with the COVID-19 pandemic. We actively promote the health and wellbeing of our people through initiatives⁵ including:

- ‘Mondi for Life’ project at Štětí mill which supports 432 members of the workforce and the community to promote a healthy and active lifestyle;
- health programmes at our Syktyvkar mill including a medical treatment facility and family care programmes; and
- our Austria-wide health management programme for employees in collaboration with Fonds Gesundes Österreich (Fund for a Healthy Austria) to support safe and healthy working conditions and sustainable health management.

We operate nine mobile health clinics in South Africa in partnership with local NGOs and the Department of Health. They provide comprehensive healthcare for forestry contractor employees and remote communities, particularly focusing on outreach, awareness, testing and contact tracing in the rural communities during the COVID-19 crisis. Since 2018, five toy library trailers attached to the mobile clinics have provided early childhood development (ECD) services.

The project brings ECD services and support sessions for families in 129 remote villages. In total, we reached some 1,167 children under the age of five in remote areas in 2020.

Infrastructure and community development

Supporting infrastructure and community development improves access to vital services, empowers enterprise, facilitates health and education and supports our business operations. In some cases, our impact assessments highlight infrastructure improvement as a local need. For example, in Russia, we build 130 km and maintain 1,500 km of forest roads annually. Our mills, such as at Syktyvkar and Ružomberok, treat community wastewater. Some of our mills also provide electricity generated by the plant to the community. At Stambolijski, we support the municipality to create and improve recreational areas in the local town. At Świecie, we provide funding for organisations that develop or provide local infrastructure, targeted at the purchase of medical, rehabilitation, sports and educational equipment. In Frantschach (Austria), the mill funds the local fire brigade.

Investment in agri-villages in South Africa

Agri-villages are sustainable rural developments that promote agriculture-based livelihoods and improve living conditions and alleviate poverty for people in isolated villages on our land. The Jabulani agri-village is now well-established and seven other agri-villages are in progress. The villages provide permanent residence to 2,019 households in sustainable human settlements with secure tenure.

Employment and enterprise support

Our support for local enterprise creates wealth and employment, strengthens the local supply chain and builds more independent, resilient communities.

Mondi Zimele

In South Africa, our main channel for supporting enterprise development is Mondi Zimele.⁶ This Mondi-owned subsidiary aims to accelerate community empowerment in the forestry value chain and support small businesses around Mondi’s

operations. Mondi Zimele’s small-scale timber grower programme has benefited over 3,200 growers and helped generate direct revenues of around €7 million to date. Through this programme, Mondi has distributed over 5.6 million seedlings and sourced approximately 426,000 tonnes of pulpwood timber from small-scale timber growers. In conjunction with various partners, this programme has also achieved a breakthrough in Forest Stewardship Council™ (FSC™) certification for small-scale timber growers.

Together we are...
using our packaging expertise to help tackle hunger and food waste

With around one-third of the food produced in the world every year lost or wasted,⁷ we can play an important role by working in partnership with global organisations that work to address hunger and poverty. Our packaging contributes by helping to ensure food is packaged safely, efficiently and sustainably, and transported effectively. We also share our insights on how packaging can be made more sustainable. In 2020, we initiated a three-year partnership with the United Nations World Food Programme (WFP). By sharing our technical and sustainability expertise in corrugated solutions, flexible packaging and industrial bags, we aim to help improve the effectiveness of WFP packaging while minimising potential impacts to the environment. We will work together over the next three years to develop, test and improve packaging solutions for global food supply chains relevant to the work of the WFP.



Relationships with communities

9 Adding value through taxes

As well as providing direct employment, we support local development through indirect employment and business opportunities, paying local and regional taxes, improving infrastructure, and through voluntary social investments.

We support global initiatives that promote tax transparency, such as the Global Reporting Initiative's (GRI) Tax Standard. Taxes are important sources of government revenue, and play an essential role in achieving the UN SDGs. Reporting on taxes demonstrates our contributions to the economies in which we operate.

We have taxable presence in 42 countries and are subject to tax in each. During 2020, we paid corporate income taxes of €168 million. We pay and collect a wide range of taxes in addition to corporate income taxes.

In 2020, our corporate income taxes paid totalled

€168m

Approach to tax

We aim to manage our tax affairs in accordance with national legislative provisions and within the guidelines set down by the OECD. Our objective is to structure our operations tax efficiently and take advantage of available incentives and exemptions provided by governments for eligible capital investments, R&D and similar expenditure.

We do not enter into any artificial arrangements.

We respect the right of national governments to set and levy national taxes and, where those taxes impact cross border flows, the guidelines set down by the OECD and in double taxation treaties.

Our tax strategy reflects our approach to tax.

The Board reviews and approves our tax strategy each year, and we make our tax statement publicly available on our website.

Tax jurisdictions and principal activities

A full list of all entities included in the financial statements, grouped by country, is included in the [Integrated report and financial statements](#) (pages 221-225).

The list includes details of the country of residence for tax purposes and the principal activities undertaken by each entity. We have no entities which are stateless or are resident in more than one state.

Some countries where we have presence are included on the European Commission list of non-cooperative jurisdictions, dated 7 October 2020. These countries include Jordan, Morocco, Thailand, Trinidad and Tobago, and Turkey. We have registered companies in each of these countries and do not use these locations for tax avoidance purposes.

Tax Governance, Control & Risk Management

Whilst the Board is ultimately responsible for the conduct of the tax affairs of the Group, operational responsibility is delegated to the Executive Committee (Exco). At both Board and Exco, the Group CFO is accountable for the conduct of the Group's tax affairs.

Local entities are responsible for the everyday conduct of business activities, including their tax affairs. The Group Tax team supports local entities, coordinates tax matters and provides operational guidelines on tax for the whole Group.

The guidelines provide details of tax risks and how to manage them, building on the principles of the Tax Strategy. For example, the OECD rules stipulate that transactions between group companies should be undertaken on similar terms to transactions between independent parties, the so called "arm's length" principle. The Tax Strategy makes clear that all transactions between different Mondi Group companies should take place at arm's length. The operational guidelines set down the type of documentation that should be obtained to evidence the 'arm's length' nature of the intra-Group transaction including external benchmark studies, where applicable.

The tax operational guidelines are the responsibility of and are maintained by the Group Tax team. The Board reviews and approves the guidelines on a regular basis.

The Group Tax team monitors tax risks and reports to the CFO and other members of Exco as issues arise. The Audit Committee formally reviews tax risks twice a year as part of the interim and year-end reporting cycles. The Board formally reviews tax management activities on an annual basis.

As we operate in a number of countries with different tax systems, we are subject to changes in legislation and differing interpretation of legislation. This may lead to increased risk of double taxation. For example, the Group makes significant intra-Group cross-border charges for product sales (and other items) which are subject to scrutiny during tax audits. Often, tax authorities on both sides of an international boundary investigate the same cross-border transaction applying differing interpretations which, in some cases, can result in double taxation.

Please see our Integrated report and financial statements 2020 for more information on the group's risk management framework and control environment.

Stakeholder engagement and management of concerns relating to tax

We maintain constructive dialogue with tax authorities and aim to work transparently and collaboratively to resolve disputes. We seek to deal with queries from tax authorities as they arise to resolve any issues in a timely manner.

Our Business Integrity Policy sets out Mondi's approach to unacceptable business practices. The policy includes 'facilitation of tax evasion' as a key corruption risk and states that the Group does not tolerate any form of tax evasion. The Policy encourages Mondi employees and stakeholders to report suspected violations or genuine concerns through dedicated channels, including through our SpeakOut mechanism (read more on [page 91](#)).



Relationships with communities

9 Adding value through taxes

Country by country reporting

In line with the OECD requirements, we prepare and submit our country by country reporting (CBCR) to the UK tax authorities annually. However, inclusion of comprehensive CBCR data beyond our current external reporting would represent disclosing commercially sensitive information.

As an alternative, we have included selected country information available to us as part of our Integrated report preparation process, which includes disclosures of effective corporate income tax rate per country and the main factors explaining any deviations to that country's statutory rate.

The countries reported on this page are consistent with the Operating Segment analysis presented in the financial statements (see pages 172-173 of our [Integrated report and financial statements](#)).

Tax Jurisdiction	External revenues € million	Employees thousands	STR %	ECITR %	Reason for significant difference between STR and ECITR
Austria	1,062	2.5	25%	23%	The ECITR was reduced in the year primarily because of tax losses arising in prior years being offset against 2020 profits. The reduction was offset by withholding tax suffered on a dividend received from a subsidiary which increased the ECITR.
Czech Republic	520	1.3	19%	5%	Due to the availability of tax incentives and accelerated tax relief for capital expenditure the ECITR is lower than the STR.
Germany	766	2.7	30%	33%	Expenses which are not deductible for tax purposes have resulted in a higher ECITR.
North America*	481	1.7	25%	13%	Tax losses arising in previous years have been offset against the 2020 profits thereby reducing the ECITR.
Poland	983	3.7	19%	17%	There are no significant differences between the tax rates.
Russia	796	5.3	20%	20%	There are no significant differences between the tax rates.
South Africa	409	1.4	28%	-10%	The negative ECITR arises because whilst the overall South African business was loss-making in the year, one company was profitable and had a corporate income tax liability. There is no possibility to consolidate the profitable company results and the loss-making companies' results.
United Kingdom	28	0.2	19%	-12%	The negative ECITR arises because whilst the UK is loss-making during the period (meaning no corporate income taxes are due) withholding taxes suffered during the year.
Other	1,618	6.9			
Total	6,663	25.7			

* The North America STR and ECITR are the weighted average US and Mexico tax rates

Definitions for CBCR data provided

External revenues: these are external revenues per location of production as reported in the Operating Segment analysis (see page 172 of our [Integrated report and financial statements](#)).

Employees: average number of employees by principal location of employment.

Statutory tax rate (STR): the applicable corporate income tax rate in the country.

Effective corporate income tax rate (ECITR): the ratio of accrued income tax compared with underlying profit-before-tax in the Mondi Group financial statements.



10

Solutions that create value for our customers

Demand for responsibly produced products has never been higher. Our innovative design of packaging and paper solutions is supporting our customers to achieve their sustainability goals. Our commitment to using 'paper where possible, plastic when useful' will enable us to lead in the transition to a circular economy.

Why is this important?

The pandemic has accelerated the shift to online shopping and heightened consumer sensitivity to hygiene and food safety. As demand for sustainable products and packaging grows, our customers depend on us to deliver their sustainability goals. Developing sustainable products allows us to grow our business while tackling issues such as plastic pollution and food waste.

What's our impact?

Over the last five years, we have evolved our approach to sustainable products from being primarily focused on lightweighting, product safety and avoiding food waste to include innovative packaging solutions in the area of functional barrier papers and mono-materials designed for recycling.¹

The market response to our customer-centric EcoSolutions approach 'using paper where possible, plastic when useful' has been positive with many customers and brands eager to improve the sustainability performance of their packaging and understand potential trade-offs.

Our Sustainable Products Criteria are now being applied across our packaging and paper businesses with a focus on developing metrics to measure our progress in making our products more sustainable.

In uncoated fine paper, the Green Range has grown from a few niche products in 2007 to cover 89 Mondi mill brands today.

We signed the New Plastics Economy Global Commitment in 2018 and we continue to report transparently on our progress. Since 2015 we have invested €130 million in R&D.

Our commitments to 2020

Encourage sustainable, responsibly produced products



Additional commitment added in 2018: Ensure 100% of plastic packaging is reusable, recyclable, or compostable by 2025



Our strategic SDGs and targets



- SDG 9 Industry, innovation and infrastructure**
- **Target 9.4** Upgrade infrastructure and retrofit industries to make them sustainable
 - **Target 9.5** Enhance scientific research, upgrade the technological capabilities of industrial sectors in all countries



- SDG 12 Responsible consumption**
- **Target 12.2** Achieve sustainable management and efficient use of natural resources
 - **Target 12.3** Halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains
 - **Target 12.5** Reduce waste generation through prevention, reduction, recycling and reuse

For links to all other SDGs, see the full [SDG Index](#)

What's next?

Through our MAP2030 commitment to offer circular-driven solutions, we will promote our EcoSolutions approach to support our customers' sustainability goals. This will include making 100% of our products reusable, recyclable, or compostable by 2025 and working with others to eliminate unsustainable packaging.



WORLDSTAR WINNER 2021

8 WorldStar packaging awards for product innovations

Together we are...
contributing to a better world by making packaging and paper that is Sustainable by Design





Solutions that create value for our customers

Packaging and paper that is Sustainable by Design

As the world continues to deal with the ongoing COVID-19 pandemic, issues such as hunger, poverty and food waste are competing with the need to reduce the environmental impacts of products and packaging. Innovative recyclable, renewable and responsibly produced packaging and paper products have a crucial role to play in building a circular economy that is fit for the future.

Leveraging our 50+ years of expertise in packaging and paper, we are committed to helping lead the transition to a more circular economy. Mondi is uniquely positioned to offer a wide range of high-performance paper-based, flexible plastic and hybrid packaging products. Our sustainable solutions offer functionality, maximise recyclability and minimise waste. Through our EcoSolutions approach we partner with customers to help them achieve their own sustainability goals.

[Learn more about our sustainable packaging EcoSolutions online or see page 81](#)

Sustainable Products criteria

We have defined six criteria that reflect all stages of the value chain and represent the parameters we consider in relation to our sustainable products. These definitions have been applied by all of our business units to reflect the relevant scope of products and impacts, and will guide the progress across our businesses to innovate and develop more sustainable products and solutions in future.

Our Sustainable Products criteria reflect all stages of the value chain.



EnvelopeMailer

- 100% renewable and fully recyclable
- Avoids excessive packaging and plastic in e-commerce



Advantage smooth white strong

- Fresh fibre with PEFC™/FSC™
- Paper-based window
- Superior strength and printability



Recyclable Mono-material PP Pouch

- Fully recyclable (cyclos HTP certified)
- Replaces multi-material laminates
- Preserves shelf-life of food





Solutions that create value for our customers

Assessing the impacts of our products

For many applications, paper packaging can be the best choice. Paper is renewable and can be fully recyclable and biodegradable. It is part of a circular approach when sourced from responsibly managed forests, and reused and recycled for different applications.



“Our initiative ‘Save plastic together with SPAR’ aims to avoid plastics completely or reduce them significantly. Mondi’s paper-based packaging creates innovative solutions for fresh products that could not be sold without packaging.”

Dr. Gerhard Drexel
SPAR CEO

We expect the recycled content of our total product portfolio to grow, particularly in our corrugated business. Our new paper machine at Ružomberok will process more than 200,000 tonnes of recycled paper mainly collected locally each year.

There are some applications for which plastic provides essential functionality that it is difficult to replicate using an alternative packaging material. This includes barrier properties which help to preserve food and other products by providing a barrier against oxygen, UV light, water vapour, odours or mineral oils.

The manufacturing footprint of our packaging products is only part of their total environmental footprint. By applying a life cycle approach, we aim to improve the sustainability performance and impact of our products across the value chain. We use comparative life cycle and environmental impact approaches to assess the benefits of paper- and plastic-based product solutions for each application. Irrespective of the base material, packaging that is lightweight and materially efficient reduces transport costs, emissions and environmental impacts. Whatever the chosen solution, we always consider potential trade-offs and impacts through to end-of-life.

Based on the feedback received in our last customer satisfaction survey regarding the importance of the sustainability and quality of products, we developed a new Product Impact Assessment (PIA) tool to calculate the life cycle impacts of our plastic- and paper-based products. Our PIA tool calculates a product’s water and carbon footprint and other environmental parameters using our own primary data.

The tool also enables a comparison of up to three different products, based on secondary average industry data. This tool complements our Product Carbon Footprint (PCF) tool for paper-based products which is based on the Capi Framework for Carbon Footprints for paper and board products.² More than 130 PCFs were calculated in 2020.

To enable customers to compare relevant pulp and paper products across different suppliers, we offer Paper Profiles, a standardised environmental product declaration used by around 18 member companies.

Green Range

Green Range is our trademark for sustainable uncoated fine paper solutions. Launched in 2007, Green Range products meet several of our Sustainable Products criteria:

Responsible sourcing: produced with Forest Stewardship Council™ (FSC™) or Programme for the Endorsement of Forest Certification™ (PEFC™) CoC certified wood fibre.

Recycled materials: made with 100% recycled content from 100% post-consumer waste.

Resource optimisation: produced totally chlorine free (TCF), reducing associated water emissions.

Some Green Range products also meet additional criteria, such as renewable materials and next life.

We kept the share of the sales volume of Green Range products stable in 2020, with 89 products in our Green Range.



Together we are...
taking centre stage with
recycled printing paper

NAUTILUS® SuperWhite & Classic: playing a leading right role at Théâtre National de Nice

Mondi’s 100% recycled paper NAUTILUS® was chosen for the 2020-21 season’s communication materials of the Théâtre National de Nice (TNN) – Centre Dramatique National Nice Côte d’Azur. They wanted to switch to recycled paper without compromising on quality. NAUTILUS® was the answer, made from 100% post-consumer waste and FSC Recycled and EU-Ecolabel certified.

“As a 100% recycled paper, NAUTILUS® is clearly suited to our vision and to the time in which we are living. Great plays need great paper if they are to reach a genuinely wide audience and NAUTILUS® will be the perfect vessel for them.”

Régis Rocca
Communications Manager at the TNN



Solutions that create value for our customers

EcoSolutions success stories

There is no single route towards sustainable products – it is about finding the best solutions for our customers, their products and the planet.

As a leader in manufacturing packaging and paper solutions, we are uniquely positioned to offer paper where possible, plastic when useful.

We want to enable our customers to make conscious decisions about packaging that is Sustainable by Design. Our customer-centric EcoSolutions approach is designed to ensure packaging is fit for purpose and supports our customers' sustainability goals. We apply a holistic view and an understanding of the trade-offs between different material choices.

Replace – Reduce – Recycle

Our approach can be described by three actions:



less sustainable packaging following our principle of 'paper where possible, plastic when useful'



by using less raw materials through sustainable design, operational efficiency and the right material choices



by developing fit-for-purpose solutions that are designed for recycling



SalzburgMilch adopts PerFORMing Removable, a sustainable cheese packaging that can be recycled in waste paper streams

The current plastic packaging is replaced with a solution that consists of a high proportion of cardboard, reducing the amount of plastic by 70%. The wafer-thin plastic layer can be pulled off the cardboard tray and disposed of separately.

Zooplus' own brand, 'Wolf of Wilderness', introduces mono-material recyclable packaging for e-commerce

Mondi is supplying zooplus with a pre-made FlexiBag Recyclable and BarrierPack Recyclable form-fill-and-seal (FFS) reel material, both certified as recyclable. This mono-material flexible packaging solution provides vital barrier properties with aesthetics and is suitable for e-commerce.



Reducing e-retail packaging waste MailerBAG

As online shopping rates continue to grow, so does packaging waste. Consumers are a driving factor in sustainability and they are actively demanding more sustainable packaging alternatives. Our patented kraft paper MailerBAG, with an easy opening and closing system, represents a value-adding and fully recyclable alternative to plastic shipping bags for non-breakable items, such as fashion items and accessories.

Mondi and BIOhof replace plastic wrapping with fully corrugated solution for fresh produce

Mondi and BIOhof Kirchweidach, an organic farm in Bavaria, have designed a sustainable packaging solution for tomatoes on the vine to be distributed to PENNY supermarkets. Coral Tray fulfils BIOhof's objective of replacing its previous plastic film packaging with a recyclable and plastic-free solution. This innovative new packaging is fully recyclable and made of renewable material and recycled corrugated board.



Darbo's new corrugated board solution eliminates plastic, is fully recyclable and made with 65% recycled content.

Austrian company, Darbo, previously packaged their jars in shelf-ready paper-based trays covered with a plastic film.

Our 100% corrugated board solution eliminates plastic and is made from 65% recycled content. Being a mono-material, the likelihood of incorrect disposal is reduced with a 60% global recycling rate for paper products.³



"Consumers want goods that are sustainably packed. Innovation is the key. Together with Mondy we eliminated the use of plastic, switching to a fully recyclable mono-material corrugated solution that is more durable, helping to prevent food waste."

Klaus Darbo
Head of Marketing, Darbo



Solutions that create value for our customers

Developing the circular economy

We collaborate with customers and partners who share our commitment to a circular economy. Paper-based solutions, when sourced responsibly, are an essential element of the circular economy. We are keen to help others understand sustainability trade-offs and show how plastic – when used for the right purpose and disposed of properly – can also be part of a circular economy to help meet the need for safe and hygienic sustainable packaging.

We believe stakeholders must come together to harmonise solutions to plastic waste across regions and drive innovative, systemic change throughout the value chain.

Climate-related legislation on packaging

The European Union Green Deal⁴ sets a roadmap towards carbon neutrality by 2050 by moving to a circular economy. One of the main elements relevant to packaging is the Circular Economy Action Plan (CEAP). Announced in March 2020, it targets the sectors that use the most resources and have a high potential for circularity. The action plan includes legislative and non-legislative measures. It combines existing regulatory measures, such as the Single Use Plastics Directive, with future development – for example on packaging waste and recycled content.⁵ The CEAP will place limits on over-packaging and mandate recycled content levels. It will also limit specified single-use plastic, encourage bio-sourced plastic and promote recycling of high-quality secondary materials.

With about 80% of our business fibre-based and our commitment to ‘paper where possible, plastic when useful’, our product innovation is focused on circular-driven solutions.

Innovation. Sustainable by Design.

Our innovation focus spans the entire value chain – from sourcing and product design to technical specification and end-of-life. We collaborate with external partners to help develop ideas, designs, technologies, procedures, markets and solutions. For example, our collaborations with waste sorters and recyclers across industries will enable us to jointly find solutions for a circular economy.

Our research centres drive innovation and collaboration across Mondi businesses. They include the uncoated fine paper Product and Process Development Centre at Hausmening (Austria), the R&D Innovation Centre and Bag Application Centre at Frantschach and the Consumer Flexibles R&D Centre at Gronau (Germany).

We are increasing our investment in R&D to drive deeper collaboration throughout the supply chain to move away from non-renewable and non-recyclable material. In 2020, we invested €23 million in R&D (€130 million since 2015). Through our strategic partnership with the Graz University of Technology related to Pulping and Paper technology, we are currently implementing the latest findings from science in order to reduce the energy consumption of the refining process. Our Group R&D paper strategic priorities relate to four areas: process technologies (raw material and energy efficiency, and zero waste); upcycling technologies (processes for bio-based materials and energy); food contact solutions; and wood and forest solutions (ensuring sustainable wood supply).

Collaborating across the value chain

We aim to support the shift towards circular thinking through collaboration with multi-stakeholder initiatives such as the WBCSD Forest Solutions Group and the Ellen MacArthur Foundation’s New Plastics Economy initiative.⁶

As co-chair of the WBCSD Forest Solutions Group, we supported the development of The Circular Bioeconomy Report, launched in November 2020. It includes a Mondi case study highlighting a mono-biomaterial corrugated design replacing plastic for our customer Darbo. We also contributed to the Forest Sector SDG Implementation Report, published in December 2020. This report provides evidence of Forest Solution Group members’ commitment to implementing the actions in the SDG Roadmap.

We signed up to the Ellen MacArthur Foundation Global Commitment in 2018, committing to achieve 100% reusable, recyclable or compostable plastic packaging by 2025.⁷ To date we have achieved 16%. The 2020 Progress Report is available [here](#). As a proportion of total plastic packaging volume, post-consumer recycled content is not yet significant. We expect it to increase through better quality and quantity of recycled material becoming available, allowing companies and retailers to commit to including recycled content in their products.

In 2019, we became a member of the 4evergreen alliance, launched by Cefi to boost the role of fibre-based packaging in a circular economy. The alliance now has more than 50 members including brand owners, manufacturers, recyclers and waste separators and aims to increase recycling rates of fibre-based packaging in Europe from 84.6% today⁸ to 90% by 2030.



Together we are...
testing digital watermarks to revolutionise how we sort and recycle waste

We believe better sorting and separation of packaging waste is crucial to the circular economy. Digital watermarks have the potential to revolutionise the way we sort and recycle waste. The HolyGrail 2.0 is an exciting initiative, launched with AIM, the European Brands Association and 85 other partners, to test pioneering digital watermarking technology in Europe. As well as enabling better sorting and higher recycling rates, we think it will increase the commercial value of waste so that it can be reused again as a resource. As a founding member, we’re playing an active role in validating the technology by running trials with other partners across the value chain.

Read more about the HolyGrail 2.0 on our website



Solutions that create value for our customers

10 Transparency and engagement

We measure our performance and provide transparency by participating in a wide range of external benchmarking initiatives, including:



CDP – a global disclosure system on companies’ environmental impacts including data on climate change, deforestation and water security. In 2020 Mondi was one of only 10 companies globally to score a “Triple A” across all three CDP reports.

[View our CDP score](#)



EcoVadis – a platform allowing companies to assess the environmental and social performance of its suppliers globally. It covers 21 criteria across four themes: environment; labour & human rights; ethics; and sustainable procurement. Mondi has a platinum rating and has consistently scored in the top 1% of our sector for five consecutive years.

[Read more about EcoVadis online](#)

[See all our external recognitions here](#)

WWF’s Environmental Paper Company Index (EPCI)⁹ – a bi-annual benchmark which evaluates the environmental policies, commitments and environmental performance of around 100 of the world’s most important pulp and paper manufacturers.

[See the 2019 results](#)

In January 2021, we will conduct a customer satisfaction survey covering all our businesses. This will include questions on the sustainability preferences and needs of our customers related to certification of sustainable products. We will report on the results in our 2021 report.

Meeting safety, health and hygiene standards

As part of our commitment to product quality, we maintain relevant and credible certifications at our operations to meet the requirements of different sectors and applications. They include ISO 9001 (quality management), ISO 14001 (environmental management) and food safety.

Our products and operations must meet all relevant safety, health and hygiene standards and other regulations as a basic requirement to ensure we provide compliant and value-added packaging to our customers. Our customers also rely on us to keep their data safe. A breach of customer privacy or security could impact Mondi both reputationally and financially. Failure to comply with marketing, advertising, promotion and sponsorship regulations and voluntary codes could also damage our reputation and result in financial penalties.

Where applicable, we communicate information on sourcing standards, production processes, product characteristics and certification through our own and external product labelling schemes.

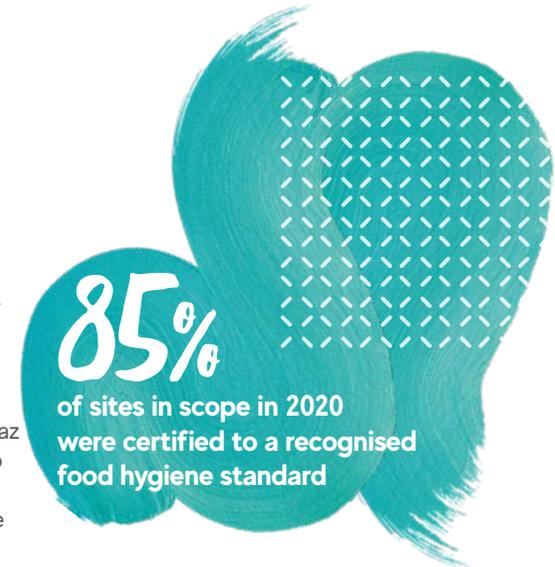
Food hygiene and product safety

Our products are subject to increasingly stringent regulation and testing to maintain high safety and quality standards. We must meet many product safety laws to ensure compliance.

The Mondi Group Food Safety Laboratories in Graz and Frantschach (Austria) support the business to develop smart, customised packaging solutions that are optimised for food contact. Our expertise in sourcing safe and sustainable raw materials for innovative products offers significant value to our customers. We assess more than 10,000 chemical parameters every year. A key focus is on how the packaging interacts with packaged goods, depending on the intended application (dry, wet, fatty or frozen foodstuffs, or foods handled at ambient conditions or microwave heated).

To ensure an appropriate packaging application, the Mondi Group Food Safety Laboratory is accredited¹⁰ for the detection of mineral oil-based hydrocarbons in recovered paper and paper-based packaging and the detection of overall gas phase migration of paper and paper-based materials. The Mondi Group Food Contact central database contains internal and external data on products and raw materials, suppliers and regulatory requirements to ensure compliance of Mondi’s products.

Third-party hygiene audits are conducted regularly for all operations that hold a hygiene management certificate as part of their certification requirements. All Mondi food contact packaging sites need to fulfil the Good Manufacturing Practices (GMP) Guidance. These are ongoing measures designed to ensure an effective overall approach to product quality control and risk management.



Of the 71 sites in scope in 2020, 85% were certified to a recognised food hygiene standard (2019: 83%).¹¹ All product categories, including products for the food industry, have also been assessed for safety and health.

Compliance across our portfolios

In 2020, we were not made aware of any of the following: complaints about breaches of customer privacy and losses of customer data; non-compliance with marketing, advertising, promotion and sponsorship regulations and voluntary codes; fines for non-compliance in the provision and use of our products; incidents of non-compliance with the product information and labelling regulations and voluntary codes to which we subscribe or incidents of non-compliance with regulations and voluntary codes on customer safety and health.

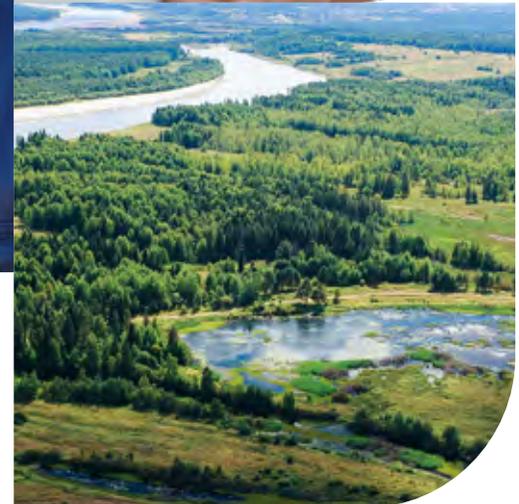
Our procedures for product information and labelling include the following legal requirements: sourcing of components of the product; content, particularly with regard to substances that might produce an environmental impact; safe use and disposal and environmental impacts. 100% of our significant product categories are covered by and assessed for compliance with such procedures.

Governance & Stakeholder engagement

Together we are...

**engaging with our
stakeholders to address
sustainability priorities**

Maintaining best-in-class services for our stakeholders this year has underlined the crucial role digitalisation plays in our global business.



Stakeholder engagement

Our stakeholders

Listening to, engaging and partnering with our stakeholders is a crucial enabler of change, trust and transparency. It ensures we understand external developments, challenges and market expectations and identify potential opportunities and risks.

We engage in meaningful global partnerships and multi-stakeholder collaborations that have the potential to bring about positive change. Sharing knowledge, resources and best practices opens up opportunities to find sustainable solutions along the entire value chain.

We define our stakeholders as internal and external individuals, groups, organisations and partners that are interested in, have influence over or are affected by (positively or negatively) our business decisions, policies and objectives.

We determine our key stakeholder groups through consultation with internal business functions and experts from our businesses. We carried out a materiality analysis to assess the relative importance of relevant sustainable development issues among key stakeholders (see [page 87](#)). In 2020, we also reviewed the sustainability topics that are important to our stakeholders to inform our new MAP2030 sustainability commitments.

 [For an overview of all key stakeholders and how we engage with them, see our Stakeholder Index online](#)

Stakeholder engagement in the age of social distancing

While face-to-face engagement is the preferred method of engagement for many of us, social distancing severely limited opportunities for meeting in this way in 2020. The restrictions underlined the vital role that digital communication platforms play in facilitating engagement and shaping the success of global business. We quickly adapted and enhanced our digital platforms to provide crucial support, engagement and training to our employees, customers, suppliers and others during the pandemic. For employees, virtual conversations – including with our CEO – kept people connected. The Mondi Academy adjusted all in-person academy training sessions to online, with the exception of local training that was possible to conduct safely on site.

New workshops were launched to help employees successfully adapt to new ways of working. To continue providing best-in-class service to our customers, we utilised new or improved digital Customer Relationship Management platforms. We developed and rolled out mymondi.net to our Corrugated Packaging customers – a secure 24/7 user-friendly e-commerce platform that enables customers to research Mondi's product portfolio, place orders, track deliveries and manage other account functions. Another example is Corrugated Packaging's Insight platform – designed to enhance the communication between customers and Mondi employees through speedy and transparent availability of current customer and market information.

OUR EMPLOYEES



How we engaged in 2020

Increased employee engagement was crucial to maintaining successful operations during 2020. We launched the biennial employee survey in a fully digital format in March and carried out two pulse check surveys to understand the impacts of remote working. Other engagement included ongoing performance and development reviews, the Group-wide intranet (planetmondi) and targeted communications and campaigns.

Key issues raised and our response

The key themes that have dominated conversations about culture include feedback and recognition, collaboration and communication, and how we can become more diverse and inclusive.

With many people working remotely in 2020, staying connected was a priority for our employees. We improved digital infrastructure and updated technology to enable people to connect with their teams. The Employee Assistance Programme (EAP) held webinars to support employees and Mondi's leadership increased communication. The Mondi Academy International adjusted in-person training sessions to online formats.

The Group-wide employee survey results raised employee engagement as a key issue – particularly the emotional connection our people feel to the company and their sense of purpose. We have focused on improving feedback and reward to foster a recognition-rich culture, including a new employee recognition scheme, You make Mondi.

OUR CUSTOMERS



How we engaged in 2020

We have continued to collaborate with customers to understand their needs, anticipate market trends, develop sustainable solutions, improve customer service and enhance product quality. We responded to customer information requests, participated in supplier sustainability rating platforms (EcoVadis) and transparency initiatives (CDP, Paper Profile and WWF's Environmental Paper Company Index). Working with customers to develop innovative and sustainable packaging solutions remained a top priority.

Key issues raised and our response

The pandemic accelerated the shift to online shopping and heightened consumer sensitivity to hygiene and food safety, sustainable products and responsible sourcing. Key issues for customers were quality, the circular economy, plastic, recyclability and competitive advantage.

Our newly developed in-house Product Impact Assessment (PIA) tool will increase transparency of our products' water and carbon footprint. We invested €23 million in research and development (R&D) in 2020 and continued our strategic partnership with the Graz University of Technology to advance research and education in Pulping and Paper Technology and in Food Contact Materials.

Reflecting the feedback from our customer satisfaction survey, collaboration with customers to develop more innovative and customised solutions is gaining momentum – for examples, see [page 80](#). The launch of our mymondi.net platform for our Corrugated Packaging business, is another example of our response to customer feedback for improved product availability.

Stakeholder engagement

OUR SUPPLIERS AND CONTRACTORS



How we engaged in 2020

Our contract managers worked closely with contractors to provide safety guidance and support to close gaps and improve practices. We conducted regular supplier risk assessments and continued to work with local small and medium-sized enterprises (SMEs) to help build their capacity and offer secure contracts, where feasible. Participation in external platforms continues to improve access to credible forest certification systems globally.

Key issues raised and our response

Close liaison between contractors and the Mondi team saw 2.2 million hours worked by over 13,800 contractors during shuts and major projects, and we continue to embed our 24-hour safety mindset and focus on 'Top Risks' and trainings for various levels of the organisation and engagement with contractors. Our nine mobile health clinics in South Africa provided healthcare and support for forestry contractor employees and their families.

We digitalised our Responsible Procurement assessment to enable more efficient, transparent and auditable supplier interactions. Questionnaires and responses are now handled and tracked via a digital platform. We risk-assessed some 1,000 key suppliers across more than 1,500 different sites.

12 rural forest SMEs in Russia benefited from our social forest projects and more than 100 forestry contractor employees attended Mondi trainings on sustainability. In South Africa, we supported a community of small-growers to achieve Forest Stewardship Council™ (FSC™) certification for the first time.

OUR COMMUNITIES



How we engaged in 2020

We maintained open relationships with local communities and provided support during the COVID-19 pandemic, targeting our community investments towards supporting the local response. Scheduled socio-economic assessment toolbox (SEAT) assessments at our mills in Turkey and the Czech Republic were postponed due to the limitations imposed by the pandemic. Local hotlines and our whistleblowing system, SpeakOut, enabled communities to raise issues and concerns.

Key issues raised and our response

Our operations supported a wide range of local priorities with many reinforcing the local COVID-19 response (see [page 74](#)). For example, we provided €3.3 million in financial support for clinics, hospitals and governments for COVID-19 relief efforts. Other efforts included donations of food packages, paper, masks, other personal protective equipment (PPE), medical and surgical raw materials.

In South Africa, Mondi Zimele intensified support for small businesses, benefiting over 3,200 small-scale timber growers. With one agri-village established and seven others in progress, sustainable human settlements provide permanent residence to 2,019 households.

We recently completed two SEAT reports, accessible on our [website](#), in response to SEAT reviews conducted in 2019 for our Dynäs (Sweden) and Świecie (Poland) mills.

We received 287 complaints from communities, including 216 odour-related and 66 noise-related complaints. We continue to invest in the latest technologies to reduce our impacts on communities.

OUR INVESTORS



How we engaged in 2020

We continued to engage with our investors throughout 2020, despite the challenges posed by the pandemic. Rather than physical roadshows, in-person meetings and conferences, engagement was held through virtual meetings. We maintained a high level of engagement throughout the year, ensuring continued dialogue between the Group and our investors on key topics such as Mondi's response to the pandemic, the trading environment, our strategy and sustainability. Details of key investor events in 2020 can be found on page 56 of our [2020 Integrated report](#).

Key issues raised and our response

Shareholders were not able to attend our Annual General Meeting (AGM) due to COVID-19 restrictions. However, we maintained engagement in the lead up to the meeting, encouraging shareholders to submit their questions in advance.

In April, at the height of the first wave of the pandemic, the Board took the difficult but prudent decision to withdraw the recommendation to pay the 2019 final dividend, with a commitment to re-evaluate later in the year when the impact of the pandemic became clearer. In August, having delivered a robust trading performance in the first half of the year and given our resilient business model and strong financial position, the Board was pleased to resume the payment of dividends.

PARTNERS, INDUSTRY ASSOCIATIONS AND ACADEMIA



How we engaged in 2020

We engaged with Ceperi, the WBCSD Forest Solutions Group, the New Plastics Economy initiative and others. We continued to work with WWF through our global partnership. We joined the Alliance for Water Stewardship and initiated a partnership with the United Nations World Food Programme. Locally, our operations engaged with NGOs, such as the Silver Taiga Foundation in Russia.

We have intensified our collaboration with IUFRO and continue to work with local scientific partners like Stellenbosch University.

Key issues raised and our response

To enable better sorting and recycling of packaging waste, we trialled digital watermarking with the HolyGrail 2.0 initiative and also engage with 4evergreen.

In South Africa, WWF developed a Monitoring, Evaluation and Learning (MEL) management tool based on learnings from the WWF-Mondi WSP. We have worked with the University of Stellenbosch to determine how our forestry lands conform with the design and management principles of effective ecological networks (ENs) derived from a decade of work with MENP.

Work with the Silver Taiga Foundation and WWF in Komi Republic led to the development of a regional methodology to identify and verify rare ecosystems. The Institute of Biology at Komi Science Centre completed an assessment of the biodiversity impacts of Mondi Syktyvkar in Russia.

Together with IUFRO and IIASA, we developed outlooks for Mondi's main wood sourcing countries to inform our future wood supply strategies. Mondi and IUFRO agreed to launch a three-year partnership for Climate-fit Forests in 2021.

Materiality

Our long-term success depends on understanding the sustainability landscape and issues that will influence Mondi's future strategic direction, impact and ability to create value.

Our material issues articulate what matters most to our business and our stakeholders. This is crucial to identify and manage our risks and opportunities and shape our effective response.

Identifying what matters

We continually monitor relevant business developments, risks and opportunities, sustainability trends, changes in legislation and the perspectives and needs of our stakeholders. In 2018, we carried out a comprehensive materiality assessment with internal and external stakeholders, using the GRI methodology. In 2019 we carried out in-depth interviews with senior leaders to explore the outcomes as part of our process to develop our post-2020 commitments. Participants included Executive Committee and Board members as well as leaders from: procurement; strategy and investor relations; consumer packaging; R&D innovation and sustainability; technical and sustainability; marketing and communication; HR; and production.

 **For a detailed overview of our materiality process, please see page 23 of our 2019 Sustainable Development report**

In 2020, we conducted a further review of the sustainability topics that are important to our stakeholders as part of benchmarking to inform our new MAP2030 commitments. We analysed insights and information from a range of external and internal sources to identify the issues most relevant to our business. Sources included: a review of sector and industry developments and responsible business practices; benchmarking of peers and

Our material issues across the value chain



RAW MATERIALS



PRODUCTION PROCESSES



PRODUCTS

Cross cutting issues along the value chain

Keeping employees and contractors safe, attracting and retaining talent and skills and enhancing diversity and inclusion; minimising environmental impacts and ensuring compliance; behaving ethically through effective governance and anti-corruption measures.

- Respecting human rights in our own operations and our supply chain
- Securing access to sustainable fibre
- Operating in a world of constrained resources and recognising concerns regarding biodiversity, forests, water and ecosystem services
- Sourcing responsibly

- Respecting human rights in our own operations and our supply chain
- Understanding and minimising our impact on and from the climate crisis
- Operating in a world of constrained resources and recognising concerns regarding biodiversity, forests, water and ecosystem services
- Maintaining our socio-economic licence to trade

- Increasing our products' eco-efficiency through innovation and product design

ESG ratings; review of customer and investor requirements; analysing NGO expectations; reviewing the UN SDGs; and considering the outcomes of SEAT assessments.

 **Click here for more information on our MAP2030 commitments**

Our material topics have remained relatively constant over the years, although some have increased in their significance to stakeholders – for example circular economy considerations for packaging and the imperative to increase efforts on climate action. In 2020, COVID-19 changed

the sustainability context with certain social topics gaining importance. Our stakeholders are becoming more focused on topics such as employee wellbeing, community wellbeing, occupational health and safety, and inclusion and equality. A key topic during the year has been how Mondi treated its employees during the pandemic and maintained relationships with customers to continue to meet their needs. Responsibility in supply chains is still an important topic for our stakeholders and the pandemic further highlighted the vulnerability of global supply chains.

In recognition of the increasing importance placed on disclosure of sustainability performance by investors, we reported according to the Sustainable Accounting Standards Board (SASB) Standard this year as well. This focuses on enabling companies to identify the sub-set of sustainability information that is material for enterprise value creation. We aim to continue to provide more decision-useful climate-related information to our investors, in line with Task Force on Climate-related Financial Disclosures (TCFD) recommendations.

 **See our GRI & SASB Index online**

Sustainability governance

Operating responsibly

Strong governance is fundamental to building a resilient and successful organisation in which sustainability is embedded at all levels. We engage openly and transparently with stakeholders across the value chain for a fair and inclusive business. Robust policies, standards and management systems guide our operations to address risks and opportunities and enable us to measure our performance and meet our commitments.

The Board and committees provide the leadership necessary to implement the principles of good corporate governance across the Group, ensuring all decisions and actions are based on integrity, responsibility, accountability, fairness and transparency. The Board reviews the performance approach and outcomes. Our Board members bring a wealth of experience and expertise to the Group. They are diverse in origin, gender, race, education and experience, and reflect the broad nature of our activities and our operational territories. At the end of 2020, we had two female directors (representing 25% of the composition of the Board) and one director of colour.

The Board delegates specific areas of responsibility to a number of committees. These have authority to make decisions according to their terms of reference. We have developed robust internal and external mechanisms to evaluate and report on performance and the effectiveness of management approach and systems. These mechanisms include reporting systems, benchmarks and stakeholder engagement and collaboration at various levels.

The results can lead to adjustments in our management approach, subject to the approval of relevant executives and, ultimately, the Board. Examples of such adjustments may be found throughout this report.

While the Board is ultimately responsible, accountability for sustainable development policies, systems, practices, commitments and actions, and the effectiveness of our approach to managing all aspects of sustainability, is monitored at three levels:

- The Sustainable Development (SD) Committee chaired by an independent non-executive director
- The Executive Committee chaired by the Group CEO
- The operational management team consisting of senior executives from across Group operations

Seven global specialist network groups provide expert insight and support to the business on specific sustainable development issues.

Mondi's Group Sustainable Development (SD) function

The Group SD function provides guidance and defines actions required to achieve our SD goals. This includes monitoring and assessing risks and opportunities along with emerging changes to the regulatory environment, developments in our social and environmental operating context, and evolving stakeholder needs and expectations. It informs, challenges and supports our businesses to respond to stakeholder needs and expectations and shapes our long-term response to global trends.

The SD function oversees the management of the Sustainable Development Management System (SDMS) and facilitates sustainability reporting, external assurance and internal and external engagement.

Our Sustainable Development Management System (SDMS)

Policies, procedures and management systems enable us to apply a consistent and standard approach to sustainability throughout our operations. We consider the environmental, social and governance implications of our business decisions. Our SDMS guides effective governance of our activities and implementation of our policies and standards. It covers all facilities and activities that we manage and operate (including those in which we hold a controlling interest), new developments, and mergers and acquisitions. Activities undertaken by contractors, either on Mondi sites or while under our management, are incorporated into the SDMS and they are required to comply with our policies, standards and requirements.



Sustainability governance

Oversight and responsibility for environmental, social and ethical performance of the Group

OUR SUSTAINABILITY GOVERNANCE FRAMEWORK

Mondi Board

Management frameworks

Sustainable Development Management System, Corporate Governance Code, other management systems, policies, standards and externally verified certification

Sustainable Development (SD) Committee

- Oversees the Group’s sustainable development approach, policies, performance and commitments. Chaired by an independent non-executive director
- Responsibility for the governance of the environment, climate change, labour, human rights, society and product stewardship
- Ensures alignment with global best practice

Executive Committee

- Management responsibility for sustainability performance within operations guided by the SD Committee
- Chaired by the Group CEO
- Ensures that business unit line management holds primary responsibility and accountability for sustainability performance

Other committees of the Board

Including Audit Committee and Remuneration Committee

Group functions and networks

- Sustainable development, legal, human resources, communications, procurement, internal audit and global specialist networks:
- Safety and occupational health
 - Social sustainability
 - Energy
 - Fire safety
 - Environment
 - Product stewardship
 - Kraft recovery boiler

Business unit and operational level responsibilities

 Read more in our 2020 Integrated report

 See our website

 Read more about the sustainability topics discussed by the SD Committee during 2020 on page 8

Sustainability governance

The Board, through the SD Committee, reviews the Group’s SD policies annually. The Board approved the updated Group SD policies in 2020, including proposed changes to policies to align with best practice and stakeholder expectations. The Group Diversity & Inclusion (D&I) Policy was subject to an update during the year, with changes aimed at strengthening governance of and collaboration on D&I issues throughout our operations and supply chain.

 [Read more about our D&I Policy on the website](#)

Our central reporting system allows us to capture and consolidate monthly and annual data on safety and health, energy, environmental, wood procurement, forestry and other sustainability parameters from our global operations. This allows us to benchmark individual operations and identify opportunities for improvement and best practice sharing across the Group. We independently assure selected KPIs annually.

How we manage SD risks and opportunities

Our Group-wide risk management framework is designed to address strategic, sustainable development, financial, operational and compliance risks that could undermine our ability to achieve our business objectives. We exercise due diligence prior to introducing new operations, practices, processes and products.

The sustainable development risk and change management standard guides the way we identify and mitigate sustainable development risks. Our risk management approach – particularly relating to environmental issues – incorporates the precautionary principle. This implies our responsibility to protect the natural environment from harm where there is a plausible risk.

We update our sustainable development risk register annually to ensure mitigation plans are

Policy developments are informed by current best practice and aligned with our Growing Responsibly model. Our Sustainable Development Governance Policy underpins our overall approach and is supported by specific policies for:

- Safety and Occupational Health
- Labour and Human Rights
- Sustainable Forestry
- Energy and Climate Change
- Environment
- Supply Chain and Responsible Procurement
- Product Stewardship
- Communities

We publish our Group D&I Policy alongside our SD policies on our website.

 [Read more about Mondi’s Governance of sustainability on our website](#)

in place for those risks with a high likelihood of occurrence and/or impact potential. These risks include inherent operational and strategic risks. In addition to key impacts on our business and stakeholders, we identify sustainability trends and opportunities and seek to mitigate risks that affect our longer-term prospects and financial performance. Read more about our TCFD disclosure on climate-related risks on [page 46](#).

Our risk management process informs the identification of material sustainability issues and the commitments we set to monitor and improve our performance in addressing them. Please refer to [page 87](#) for more information on our material issues and [page 18](#) for progress against our commitments.

Mondi’s internal audit function

The internal audit function is an integral part of the Group’s governance. Its purpose, as an independent assurance function, is to evaluate whether business risks are being managed effectively within the context of business objectives. A system of internal control is one of the primary means of managing risk. Evaluating its effectiveness is central to internal audit responsibilities. Mondi’s system of internal control comprises the policies, procedures, practices and organisational culture that

collectively support effective operation in the pursuit of our objectives. This enables us to respond to significant business risks and is the direct responsibility of the Board and executive management. The assurance provided by internal audit assists the Board in fulfilling its duties and obligations under the UK Corporate Governance Code and in reporting annually to shareholders on the effectiveness of Mondi’s systems of control. The Audit Committee has primary responsibility for monitoring and reviewing the effectiveness of the Group’s internal audit function.



Sustainability governance

SpeakOut hotline

The Board, supported by the Audit Committee, oversees the adequacy of SpeakOut, our anonymous whistleblowing and grievance system for employees, customers, partners and other stakeholders to raise any concern relating to potential bribery, discrimination, fraud, corruption, environmental pollution, major safety and health violations, harassment or other significant topics. Internal audit is responsible for the day-to-day monitoring of the SpeakOut process, ensuring management is appropriately informed of reported issues and related risks are adequately addressed. Summaries of reported issues and the status of unresolved items are presented at each meeting of the Audit Committee and to the Board to ensure appropriate investigation has been undertaken, and actions taken in response to any allegations which prove to be valid.

In 2020, we received 125 SpeakOut messages (2019: 162) relating to 74 cases (2019: 104 cases), and two further cases through other channels. These covered a number of topics, in particular HR-related concerns, business integrity issues, as well as environmental and safety topics.

All SpeakOut messages were forwarded to the respective Mondi management team in accordance with our standard procedures. We responded and took appropriate corrective action for all issues.

In 2020, we conducted a gap analysis of our human rights-related practices and approach, including our SpeakOut mechanism, with the Danish Institute for Human Rights (DIHR). We are working on an action plan to address the findings and to ensure increasing alignment of SpeakOut with Principle 31 of the UN Guiding Principles on Business and Human Rights.

Political donations, gifts and bribes

Mondi is opposed to all forms of corruption and illegal practice. The Group does not tolerate the giving or receiving of bribes, nor does it condone anti-competitive practices in its dealings with governments or in the marketplace. Mondi does not permit contributions or donations for political purposes. Our approach to preventing corruption is published in company guidelines and policies, on the local and Group-wide intranets, and on the Group website. Mondi requires any lobbying undertaken to be in line with the Group's business ethics and policies. Our policies on these matters are set out in our Business Integrity Policy. Mondi's definition of bribery, as defined in this policy, includes facilitation payments.

Fines, non-monetary sanctions and significant legal issues

Mondi was not the subject of any legal actions for anti-competitive behaviour, anti-trust or monopoly practices during 2020. Mondi has not received any material fines or non-monetary sanctions for non-compliance with laws and regulations. The Group is not aware of any pending prosecutions.

Anti-corruption

Reputational risk, including corruption risk, forms part of the annual Group risk assessment process used to identify the Group's principal risks. This is reviewed by the Audit Committee and the Board. All our businesses feed their risks into this process. No significant risks related to corruption were identified through the risk assessment process in 2020. All Board members received and have access to Mondi's anti-corruption policies and procedures, which are covered by the Business Integrity policy. They were briefed on anti-corruption requirements as per the UK Bribery Act when it came into force, with regular updates. All employees have access to organisational policies, including the Business Integrity Policy, through planetmondi (our global intranet) and the Mondi website. Annual updates of organisational policies are communicated through planetmondi. All relevant employees' complete competition compliance and business integrity training which covers anti-corruption. The number of relevant employees in 2020 was 2,919, with 773 (26%) receiving online training and testing during the year. Our Business Integrity policy is available to all our business partners through our website and is included in all supplier contracts. Suspected cases of non-compliance can be reported through the SpeakOut tool, which is available to both internal and external stakeholders. There were no public legal cases brought against Mondi or our employees in 2020.

In 2020, we received

125

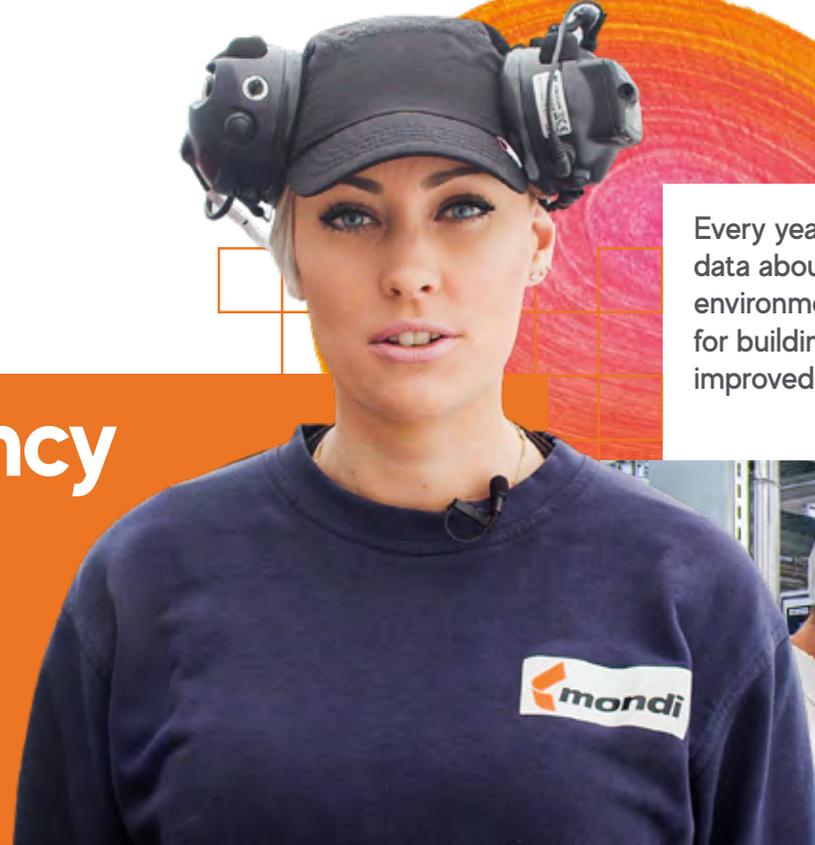
SpeakOut messages
relating to 74 cases



Performance

Together we are...

**increasing transparency
around our impacts**



Every year, we share robust data about our performance and environmental impacts. It's crucial for building trust, transparency and improved performance.



Consolidated performance data

Financial performance

€ millions, unless otherwise stated	2016	2017	2018	2019	2020
Group revenue	6,662	7,096	7,481	7,268	6,663
Underlying EBITDA	1,366	1,482	1,764	1,658	1,353
Underlying operating profit	981	1,029	1,318	1,223	925
Operating profit	943	968	1,192	1,221	868
Basic underlying earnings per share (EPS) (euro cents)	137.8	148.9	189.1	171.1	129.3
Basic EPS (euro cents)	131.8	137.9	170.1	167.6	120.0
Capital expenditure cash outflows	(465)	(611)	(709)	(757)	(630)
Net debt	1,383	1,532	2,220	2,207	1,791
ROCE (%)	20.3	19.3	23.6	19.8	15.2

Diversity

Gender diversity 2020	Male	%	Female	%
Directors	6	75	2	25
Senior managers	154	85	28	15
Employees ¹	20,334	79	5,537	21

¹ As at 31 December 2020

Management by origin 2020	Number
Austria	57
Czech Republic	9
France	2
Hungary	1
Italy	11
Poland	32
Russia	14
Slovakia	5
South Africa	59
Turkey	17
United Kingdom	7
Other nationalities	143



Consolidated performance data

Training

Employee and contractor training hours	2016	2017	2018	2019	2020
	790,000	829,900	819,200	801,900	617,470
Coverage of safety in training hours (%)					2020
Safety-focused training					42
Other training					58

Safety

Number of work-related fatalities	2016	2017	2018	2019	2020
Employees	0	2	0	0	0
Contractors	0	1	1	2	2
Total recordable case rate (per 200,000 hours worked)	0.69	0.68	0.68	0.63 ²	0.58

2 2019 figure has been restated to include the Kuopio mill and Egyptian paper bag plants acquired in 2018

Communities

Community and social investments ('000 €)	2016	2017	2018	2019	2020
Health and wellbeing	653	1,959	2,079	984	911
Education	565	731	724	838	760
Infrastructure and development	6,425	6,509	4,697	10,721	5,680
Enterprise and employment support	254	432	431	548	1,022
COVID-19					3,140
Total3	7,897	9,631	7,931	13,090	11,513

3 Changes in investment levels over the years do not necessarily represent a change in investment strategy. They are sometimes reflective of the commencement or closure of projects. Most initiatives run over several years and require different levels of investment for each development phase



Consolidated performance data

Forests and fibre procurement

Forestry data 2020	Russia	South Africa	Total
Total area of forestry landholdings (ha)	2,286,056	253,680	2,539,736
Proportion of land set aside for conservation (%)	25	28	25
Number of seedlings planted	3,405,500	20,840,725	24,246,225
Wood self-sufficiency potential (%)			48.8

Fibre use	2016	2017	2018	2019	2020
Wood (internal and external) (million m ³)	16.6	16.9	17.4	17.6	18.0
Pulp (externally procured) (million tonnes)	0.4	0.3	0.3	0.3	0.2
Paper for recycling (million tonnes)	1.3	1.3	1.3	1.3	1.3

Fibre procured from FSC™- or PEFC™-certified sources 2020 (%)	FSC	PEFC	Total
Wood	47	29	76
Pulp (procured externally)	91	3	94

Certified wood procured (%)	2016	2017	2018	2019	2020
FSC	46	50	49	46	47
PEFC	21	21	22	26	29
Total	67	71	71	72	76

Sustainable solutions

Products that are reusable, recyclable or compostable	2020
% of total revenue	76% ⁴

4 This percentage includes Mono-material plastics designed for recycling and all products consisting of at least 95% paper and therefore deemed widely recyclable. Additional Mondi products with lower fibre content may also be recyclable in certain systems, but have not been included



Consolidated performance data

Energy and climate

CO ₂ e emissions from our pulp and paper mills (tonnes)	Scope 1	Scope 2	Total CO ₂ e
2016	4,067,788	671,247	4,739,035
2017	3,777,282	691,649	4,468,931
2018	3,805,696	583,031	4,388,727
2019	3,908,247	456,323	4,364,570
2020	3,529,550	429,170	3,958,720

Specific CO ₂ e emissions from our pulp and paper mills (tonnes per tonne of saleable production)	Scope 1	Scope 2	Specific total (Scope 1 and 2) CO ₂ e
2016	0.65	0.11	0.76
2017	0.61	0.11	0.72
2018	0.63	0.10	0.72
2019	0.64	0.07	0.71
2020	0.57	0.07	0.64

GHG emissions from our pulp and paper mills, by country 2020 (tonnes)	Tonnes
Austria	199,129
Bulgaria	68,406
Czech Republic	427,525
Finland	121,337
Poland	110,417
Russia	1,893,317
Slovakia	135,322
South Africa	866,277
Sweden	82,549
Turkey	54,441
Total	3,958,720



Consolidated performance data

GHG emissions from our pulp and paper mills 2020 (tonnes)	Scope 1	Scope 2	Total
Dynäs (Sweden)	21,149	61,400	82,549
Frantschach (Austria)	51,278	-	51,278
Hausmening (Austria)	84,396	22,728	107,125
Kematen (Austria)	34,221	6,505	40,726
Kuopio (Finland)	105,709	15,628	121,337
Merebank (South Africa)	152,576	148,060	300,636
Richards Bay (South Africa)	512,389	53,252	565,641
Ružomberok (Slovakia)	121,388	13,934	135,322
Stamboljiski (Bulgaria)	24,567	43,839	68,406
Štětí (Czech Republic)	398,717	28,808	427,525
Świecie (Poland)	95,994	14,422	110,417
Syktvykar (Russia)	1,893,317	-	1,893,317
Tire (Turkey)	33,847	20,594	54,441

GHG emissions by activity (tonnes)	2016	2017	2018	2019	2020
Energy sales-related GHG emissions	1,121,871	1,000,772	944,750	912,030	811,088
Mills Scope 1 excluding energy sales	2,945,916	2,776,510	2,860,946	2,996,217	2,718,462
Mills Scope 1 emissions from fuel combustion	3,928,820	3,614,281	3,606,254	3,724,295	3,390,534
Mills Scope 1 emissions from use of carbonates	8,066	11,945	11,052	11,307	11,520
Mills Scope 1 emissions from production-related mobile transportation	73,037	71,388	73,236	67,661	74,139
Mills Scope 1 emissions from landfills and wastewater treatment plants	44,330	67,516	94,116	72,693	45,391
Mills Scope 1 emissions from ozone depleting substances	13,535	12,152	21,039	32,290	7,966
Mills Scope 2	671,247	691,649	583,031	456,323	429,170
Converters Scope 1	140,001	146,845	147,493	142,490	137,470
Converters Scope 2	249,521	274,845	261,855	234,515	223,067

Electricity self-sufficiency of our pulp and paper mills (%)	2016	2017	2018	2019	2020
Own electricity produced	97.9	95.6	100.2	102.1	103.8
Electricity purchased	25.2	20.9	17.5	14.9	14.4
Electricity sold	23.1	16.5	17.7	17.0	18.1

Fuel consumption of our pulp and paper mills (million GJ)	2016	2017	2018	2019	2020
Produced from our own biomass	87.2	87.8	84.3	86.4	90.5
Purchased fuel	71.2	68.6	70.3	71.3	68.3

Consolidated performance data

Total fuel consumption from non-renewable sources⁵ (GJ)	2016	2017	2018	2019	2020
Black coal	11,657,239	9,066,155	7,044,927	6,923,940	5,168,909
Brown coal	2,776,219	2,653,284	2,836,275	3,254,698	3,143,412
Heavy fuel oil	902,649	729,227	863,764	1,209,792	614,073
Natural gas	44,777,286	44,025,729	46,785,317	46,035,922	42,421,112
Other fossil fuel	671,017	700,496	748,527	1,687,075	1,008,400

5 Fuels are reported according to their lower heating value (LHV); the emissions factor source is taken from ÜBPV (BGBl II Nr. 339/2007)

Total fuel consumption from renewable sources (GJ)	2016	2017	2018	2019	2020
Biomass purchased	12,292,129	13,360,345	13,939,473	14,087,189	15,649,478
Black liquor/base liquor - thickened	73,311,150	74,032,219	71,468,423	72,833,265	75,573,074
Own biomass	11,021,724	10,674,486	9,872,304	10,029,633	11,132,981
Other renewable fuel	3,182,763	3,414,622	3,312,916	3,858,592	4,086,796

Fuel sources for our pulp and paper mills (%)	2016	2017	2018	2019	2020
Renewables	63	65	64	64	67
Black liquor	46.3	47.3	46.2	46.2	47.6
Biomass purchased	8.0	8.8	9.2	9.1	10.0
Own biomass	7.0	6.8	6.4	6.4	7.0
Other biofuel	1.8	2.0	1.9	2.3	2.4
Non-renewables	37	35	36	36	33
Natural gas	27.3	27.1	29.2	28.2	26.7
Black coal	7.4	5.8	4.6	4.4	3.3
Brown coal	1.8	1.7	1.8	2.1	2.0
Other fossil fuel	0.6	0.5	0.6	1.4	1.0

Production-related specific energy (GJ per tonne of saleable production)	2016	2017	2018	2019	2020
Total energy consumption in our pulp and paper mills	16.52	16.46	16.64	16.25	16.46
Electricity consumption	3.98	3.98	3.97	3.97	4.12
Heat consumption	12.54	12.48	12.67	12.28	12.34



Consolidated performance data

GHG emissions (further details)⁶ (tonnes)	2016	2017	2018	2019	2020
Scope 1 GHG emissions from C ⁷	3,898,490	3,582,148	3,578,512	3,690,021	3,357,158
Scope 1 GHG emissions from CH ₄ ⁷	12,036	12,155	12,046	12,190	12,861
Scope 1 GHG emissions from N ₂ O	91,332	91,366	88,932	89,746	94,654
Scope 1 GHG emissions from ozone-depleting substances	12,167	8,117	19,655	32,290	7,966
Scope 2 market-based	671,247	691,649	583,031	456,323	429,170
Scope 2 location-based	1,083,687	806,945	570,382	441,333	380,665
Biogenic GHG emissions	12,752,816	12,954,968	12,571,767	12,812,150	13,518,291

6 Market-based method: A method to quantify Scope 2 GHG emissions, based on GHG emissions emitted by the generators from which the reporter contractually purchases electricity bundled with instruments, or unbundled instruments on their own (CDP, 'Accounting of Scope 2 emissions', V3, 2016). Location-based method: A method to quantify Scope 2 GHG emissions based on average energy generation emission factors for defined locations, including local, sub-national, or national boundaries (CDP, 'Accounting of Scope 2 emissions', V3, 2016)

7 Scope 1 GHG emissions include those from fuel combustion and mobile transportation. Additional Scope 1 GHG emissions in 2020 derive from the operation of landfills and wastewater treatment plants (45,391 tonnes) and the use of carbonates (11,520 tonnes)

Energy use from our pulp and paper mills (GJ)	2016	2017	2018	2019	2020
Electricity purchased	6,277,050	5,217,232	4,250,850	3,623,860	3,468,404
Own biomass	87,193,849	87,791,377	84,334,769	86,413,615	90,493,076
Purchased biomass	12,613,917	13,690,293	14,258,347	14,393,349	15,949,253
Fossil fuels consumed	58,616,253	54,887,101	55,999,985	56,902,394	52,355,906
Heat purchased	16,206	63,996	83,545	73,088	67,916
Energy sales	(11,609,519)	(10,081,724)	(10,198,309)	(9,835,515)	(9,903,293)
Total	153,107,757	151,568,275	148,729,187	151,570,791	152,431,261

Energy use from our converting operations (GJ)	2016	2017	2018	2019	2020
Electricity purchased	1,881,472	1,965,292	1,948,379	1,866,083	1,812,319
Fossil fuels consumed	2,168,157	2,287,791	2,278,825	2,209,033	2,152,938
Heat purchased	187,220	174,977	182,561	195,472	203,891
Total	4,236,850	4,428,060	4,409,764	4,270,588	4,169,149

	2016	2017	2018	2019	2020
Electricity purchased from renewable sources (%)	8	2	2	9	5



Consolidated performance data

Scope 3 emissions (tonnes)	2016	2017	2018	2019	2020
Fuel and energy-related activities (not included in Scope 1 or 2)	399,966	385,613	589,834	628,002	613,511
Purchased goods and services	1,826,793	1,867,405	1,853,798	1,840,745	1,853,696
Employee commuting	48,514	49,469	49,851	48,984	49,412
Upstream transportation and distribution	435,692	447,613	483,037	465,425	477,332
Downstream transportation and distribution	260,035	259,998	253,453	256,647	257,363
Business travel	4,303	3,904	11,007	11,850	2,145
Total	2,975,303	3,014,002	3,240,979	3,251,652	3,253,460

Water, air and waste

Water

Water input (m³)	2016	2017	2018	2019	2020
Total water input (m³)	309,031,879	307,071,545	303,459,107	306,299,800	317,270,746
Potable water input	23,315,191	22,620,731	24,332,544	27,180,356	24,449,849
Non-potable water	285,716,688	284,450,814	279,126,563	279,119,444	292,820,897
Second-class water	11,217,052	11,928,377	9,290,059	8,218,302	7,402,517
Surface water	249,275,693	246,973,299	247,081,374	252,751,131	266,062,494
Ground water	25,223,943	25,549,137	22,755,130	18,150,011	19,355,887
Waste water from third parties and other Mondi operations	38,229,853	38,669,589	36,288,548	36,972,077	36,163,409

Total water input (%)	2016	2017	2018	2019	2020
Non-potable water	92	93	92	91	92
Potable water	8	7	8	9	8

Emissions to water (tonnes)	2016	2017	2018	2019	2020
Emissions to water, COD	43,879	42,711	48,349	48,549	36,843
Emissions to water, AOX	155	170	150	153	122
Emissions to water, TSS	9,503	7,259	11,417	9,307	5,793



Consolidated performance data

Effluent (water discharges) (m³)	2016	2017	2018	2019	2020
Discharge via on-site or off-site treatment	235,945,906	231,652,362	228,523,805	235,836,629	234,436,270
Discharge direct to surface water without treatment	83,381,085	88,590,582	85,031,235	87,798,958	97,123,157
Discharge to irrigate land	51,367	50,645	54,660	50,474	42,777
Discharge sent to third parties for recycling or reuse of water	738,358	7,747,028	1,634,045	1,200,584	1,146,288
Total water output	320,116,716	328,040,616	315,243,745	324,886,644	332,748,492
Waste water from third parties and other Mondi operations	38,229,853	38,669,589	36,288,548	36,972,077	36,163,409
Total water output (excluding third parties)	281,886,862	289,371,027	278,955,197	287,914,568	296,585,082
Water discharged to ocean/sea	22,631,496	21,429,777	22,095,268	21,243,214	16,772,673
Water discharged to rivers	297,485,220	306,610,839	293,148,477	303,643,430	315,975,819

Contact and non-contact water use (m³)	2016	2017	2018	2019	2020
Non-contact water	91,897,722	98,448,861	97,438,070	99,317,853	108,202,843
Contact water	206,763,090	205,435,261	202,783,297	203,736,411	205,031,869

Air

Air emissions (tonnes)	2016	2017	2018	2019	2020
Total NO _x emissions from processes	11,591	11,048	10,398	11,031	10,918
TRS from processes	52	56	55	44	48
Total particulate emissions	963	921	1,023	928	961
Total SO ₂ emissions from processes	1,985	1,447	1,567	1,276	1,059



Consolidated performance data

Particulate emissions from processes (tonnes)	2016	2017	2018	2019	2020
Particulate emissions from drying of pulp	5	2	2	1	1
Particulate emissions from bark boiler	159	165	140	105	72
Particulate emissions from lime kiln	87	79	65	71	90
Particulate emissions from auxiliary boilers	210	161	158	157	126
Particulate emissions from recovery boiler	500	503	655	593	670
Particulate emissions from other sources (allocated to paper production)	0	11	0	0	0
Particulate emissions from other sources (allocated to pulp production)	1	2	2	0	1
Total	963	921	1023	928	961

Emissions of ozone-depleting substances (kg)	2016	2017	2018	2019	2020
HFC	6,262	4,289	10,101	15,949	3,917
HCFC	628	1,420	740	413	274
CFC	0	1	0	0	0
Halons	0	0	0	0	0
PFC	0	0	0	0	0
Total	6,890	5,710	10,841	16,361	4,191



Consolidated performance data

Waste					
Waste to landfill (tonnes)	2016	2017	2018	2019	2020
Non-hazardous waste landfilled	205,251	191,462	231,261	227,196	176,054
Hazardous waste landfilled	1,230	455	1,054	1,390	297
Total	206,481	191,917	232,315	228,585	176,351
Hazardous waste (tonnes)	2016	2017	2018	2019	2020
Hazardous waste treated	9,273	11,445	11,061	11,448	11,563
Hazardous waste incinerated	3,473	3,593	5,683	3,225	3,960
Hazardous waste recycled/reused	2,829	2,298	3,854	2,695	2,574
Hazardous waste landfilled	1,230	455	1,054	1,390	297
Total	16,806	17,792	21,653	18,757	18,394
Non-hazardous waste (tonnes)	2016	2017	2018	2019	2020
Non-hazardous waste treated	2,949	7,247	7,007	7,175	8,106
Non-hazardous waste incinerated	61,346	49,400	52,447	62,702	72,777
Non-hazardous waste recycled/reused	831,846	846,862	825,364	745,255	691,273
Non-hazardous waste landfilled	205,251	191,462	231,261	227,196	176,054
Total	1,101,392	1,094,972	1,116,080	1,042,327	948,209
Total debris⁸ (tonnes)	2016	2017	2018	2019	2020
Non-hazardous debris	22,102	57,911	74,928	260,571	67,686
Hazardous debris	0	91	153	287	6,363
Total	22,102	58,002	75,081	260,858	74,049
8 Process-related waste, which is disposed on landfill, is reported as "hazardous waste to landfill" or "non-hazardous waste to landfill". Debris from construction activities on-site (including soil) is also monitored, but reported separately					
Total solid waste (tonnes)	2016	2017	2018	2019	2020
	1,140,299	1,170,765	1,212,814	1,321,943	1,040,652

About this report

This 2020 Sustainable Development report covers the financial year 1 January 2020 to 31 December 2020 and should be read in conjunction with our Integrated report and financial statements 2020. Our previous report was published in March 2020 for the financial year 1 January 2019 to 31 December 2019.

Reporting standards and format

This report provides a comprehensive view of our approach to sustainable development and our performance in 2020 with regard to environmental, social and governance issues. It has been prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core option as well as the Sustainability Accounting Standards Board (SASB) Sustainability Accounting Standard for the Containers & Packaging Industry. We have applied the GRI Guidelines to our annual sustainability reports since 2009, and the GRI Standards since 2018. This year we have additionally applied the SASB Standards Application Guidance. We believe that these frameworks offer us the best way to present our most important sustainability information in a fully transparent, accurate and reliable way. Guided by the GRI Standards for structure and principles of reporting, the content is defined through various internal and external processes including risk management (see Sustainability governance on [page 90](#)), materiality assessment (see [page 87](#)) and stakeholder engagement at various levels (see [page 85](#)).

We also report our performance against the sustainability metrics defined in our non-financial reporting system (SIM) for internal and external reporting of key performance indicators (covering safety and health, wood procurement, forestry, environment, energy and products). Throughout the report, by 'our operations' we mean our pulp and paper mills, converting operations and forestry operations, unless otherwise specified. For better readability, we have reduced reporting of figures generally to 2 decimals and rounded performance. Nevertheless, trends to previous years have been calculated by considering the actual performance figures.

In addition, we report on progress against the commitments we made for the period 2016 to 2020 against a 2015 baseline. We achieved our initial greenhouse gas (GHG) reduction target to 2030 (against a 2014 baseline) early and so replaced it with a science-based GHG reduction target (retaining the 2014 baseline) in 2019.

As a signatory to the United Nations Global Compact (UNGC), this report aligns with the UNGC's 10 universally accepted principles in the areas of human rights, labour, environment, and anti-corruption and highlights progress made in 2020, towards these principles. Our annual Communication on Progress to the UNGC can be found at www.mondigroup.com/ungc_cop.



Disclosures of management approach based on GRI Standards methodology

The Action Areas in this report reflect the Group's sustainable development management areas, which usually include more than one GRI material topic. For example, the 'Constrained resources and environmental impacts' Action Area includes information relating to the material topics, waste, water consumption, emissions to water and air; and the 'Fairness and diversity in the workplace' Action Area includes the material topics employment, labour/management relations, human rights assessment and diversity and equal opportunity.

Using the GRI 103 Standards: Management Approach, we have described topic-specific disclosures of the management approach in a separate table within our GRI and SASB Index. Some information, which applies across all material aspects, is provided here and includes our approach to policies, commitments, goals and targets, responsibilities and resources. Statements provided in the Sustainability governance section (see [page 88](#)) on the governance and accountability of sustainability at Mondi is valid for all reported focus areas and all GRI material topics included in this report. Our Sustainable Development Management System (SDMS), including policies, standards and performance requirements, governs our approach and we have systems in place to support the monitoring and measurement of our performance. Our Group-wide reporting systems include key performance indicators across our focus areas and reported material topics, and our performance is guided by our public commitments – a set of mid- and long-term goals that shape our approach and track our progress. See the GRI & SASB Index on our website for a more detailed overview of our reporting according to GRI Standards core criteria, and [page 18](#) for a more detailed overview of performance against our 2020 commitments. Roles and responsibilities for managing our focus areas and material aspects are described in the Sustainability governance section (see [page 89](#)) under 'Our Sustainability Governance Framework'.



See our GRI & SASB Index online



About this report

The resources that we use to manage our focus areas and material aspects include:

- Our well-invested, low-cost, high-quality mills and converting operations
- A strong financial position to fund our business and pursue relevant growth opportunities
- Our talented and committed people
- Access to natural resources such as fibre and water, as well as fuels and electricity
- Strong partnerships with our suppliers and our customers
- Our constructive working relationship with communities, governments, non-governmental organisations (NGOs) and other stakeholders

Please refer to our business model on [page 10](#) and see our 10 Action Areas on [page 18](#) for a more detailed overview of how we manage each material aspect.

Reporting scope

In terms of performance data, the following should be noted:

- No significant changes from previous reporting periods in the scope, boundary or measurement methods were applied in the report this year
- No material restatements have been made to data in this report. Reported data remains comparable with last year's data, unless noted otherwise
- No material changes to reporting scope and methodologies have been made in this report
- To calculate the progress of our commitments we calculated the specific figures of key performance parameters against the corrected base year (2014, 2015) by excluding divested mills (Raubling, Pine Bluff)
- Our environmental performance covers all our manufacturing operations (including converting operations), unless stated that they are limited to 'our pulp and paper mills' or otherwise. Examples include some energy and climate related data
- GHG emissions are reported according to the GHG Protocol, published by the WBCSD and the World Resources Institute. We adhere to the Science Based Targets initiative (SBTi) definition and framework for our GHG emissions targets
- Safety data includes all employees and contractors, but usually excludes service suppliers such as catering, office cleaning or telecommunications and management consultants (a number of our operations include service providers in their performance where relevant)

- In our 'Employee and contractor safety & health' Action Area, the safety training hours reported exclude recent acquisitions, in line with all other safety data. The scope reported in our 'A skilled & committed workforce' Action Area includes recent acquisitions
- Financial information is reported in euros (€), for ease of reading and to allow comparisons
- Where we have reported wood volumes in m³, this figure reflects solid cubic metres

GHG emissions scope and boundaries

The calculation of our Scope 1 emissions is based on the fuel consumption in our energy plants as well as in Mondi-owned vehicles and the consumption of CO₂ emitting process chemicals (e.g. dolomite). Mondi takes into account the emissions of methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbon (HFC) and hydrochlorofluorocarbons (HCFC) emissions from refrigerant leakage, as well as emissions from sulphur hexafluoride (SF₆ leakage) from old electrical switch gears. Our operations report all direct emissions as well as those indirect emissions attributable to imported electricity, steam, and heated or cooled water on a monthly basis. Scope 1 and Scope 2 emissions are calculated according to the GHG Protocol, published by the WBCSD and WRI, EU Emissions Trading Scheme (EU ETS) monitoring and reporting regulations, and ISO 14064-1 based on primary data (such as energy bills, meters with defined accuracy) and are externally verified with reasonable assurance.

Scope 3 emissions are calculated and reported at Group level based on the GHG Protocol's 'Corporate Value Chain (Scope 3) accounting and reporting standard' (Oct 2011). Due to lack of primary data, in many cases secondary data (sourced from databases like Ecoinvent) have to be used for the calculation of Scope 3 emissions. Scope 3 data are externally verified with limited assurance on an annual basis.

Biogenic emissions are calculated on the basis of biomass input in our energy plants. This includes purchased biomass incinerated in our biomass boilers, bark and by-products from the pulp process such as black liquor, pitch fuel, tall oil, turpentine, methanol, biogas from anaerobic wastewater treatment plants, and others. Specific GHG factors used are taken from the GHG Protocol for the paper and pulp industry as well as from regulatory directives (such as EU ETS) and supplier information (e.g. Scope 2 emissions for electricity purchased). In the calculation of our Scope 2 emissions, details such as inclusion of CO₂, CH₄, N₂O, HFCs, PFCs, SF₆ are currently not reflected.



About this report

External assurance

External assurance plays an important part in our reporting and it provides stakeholders with assurance in respect of our performance. Our policy and practice is to seek external assurance of our Sustainable Development report on an annual basis. The Board (through the Sustainable Development (SD) Committee) and the Executive Committee approve the approach to and scope of external assurance every year, oversee the overall reporting progress, and are informed of the assurance observations and recommendations. Environmental Resources Management Certification and Verification Services (ERM CVS) provided limited assurance on selected KPIs that we report, on the status of compliance of this report with GRI Standards core criteria and SASB Sustainability Accounting Standard for the Containers and Packaging Industry and verification of GHG data in accordance with ISO 14064 to reasonable (pulp and paper mills) and limited (converting operations) levels of assurance. PricewaterhouseCoopers, our appointed statutory auditors, provided an unqualified audit opinion on our 2020 financial statements.

For a detailed overview of our materiality process, please refer to page 23 of our [2019 Sustainable Development report](#).

Additional information

In addition to our online Sustainable Development report 2020, other information – including policies and standards, report archives, governance of sustainability, case studies, associations we support, useful links and sustainability contacts – can be found at:

www.mondigroup.com/sustainability



[See our SDG Index and our Stakeholder Index for more information](#)



Independent Assurance Statement to Mondi Group

ERM Certification and Verification Services (ERM CVS) was engaged by Mondi Group ('Mondi') to provide assurance in relation to Mondi's 2020 Sustainable Development report ('the Report').

Engagement summary

Scope of our assurance engagement

- Whether the Report is fairly presented in accordance with the Global Reporting Initiative (GRI) Standards Core option, and the Sustainability Accounting Standards Board (SASB) Sustainability Accounting Standard for the Containers & Packaging Industry.
 - Whether the 2020 data for the following key performance indicators ('KPIs') are fairly presented, in all material respects, with the reporting criteria:
 - Total energy usage (GJ);
 - Total Scope 1 and Total Scope 2 (location-based and market-based) greenhouse gas (GHG) emissions (tonnes CO₂e);
 - Total Scope 3 GHG emissions from the following categories (tonnes CO₂e):
 - Category 2: Purchased goods and services
 - Category 3: Fuel and energy-related activities not included in Scope 1 or Scope 2
 - Category 4: Upstream transportation and distribution;
 - Category 6: Business travel
 - Category 7: Employee commuting
 - Category 9: Downstream transportation and distribution
 - Total water input (pulp and paper mills) (m³);
 - Total water output (pulp and paper mills) (m³);
 - Total contact and non-contact water use (m³);
 - Total hazardous and non-hazardous waste (tonnes);
 - NOx emissions (tonnes);
 - COD emissions (tonnes);
 - Total Recordable Case Rate (number/200,000 hours)*;
 - Fatalities and Life Altering Injuries (number)*;
 - Management Risk Focused audits conducted (number);
 - First Line Manager Task audits conducted (number);
 - Critical safety training completed (hours);
 - General safety training completed (hours);
 - General training completed (hours);
 - Certified wood procured (percentage, m³)*;
 - Certified pulp procured (percentage, tonnes);
 - Managed land set aside for conservation purposes (percentage);
 - Ratio of male and female employees (%);
 - Community and social investments, by category (€).
- Whether the reported performance compared to the 2015 baseline for those KPIs associated with a 2020 commitment (marked with * above) is fairly stated in accordance with the reporting criteria.
 - Whether the disclosures relating to the above KPIs in the Report are consistently presented in Mondi's 2020 Integrated report and financial statements ('Integrated report').
 - Whether the disclosures relating to GHG emissions presented in the section 'Climate change' on pages 58-60 of the Integrated report comply with the requirements of the UK Companies Act 2006 (Strategic Report and Directors' Report) Regulations 2013.

Reporting criteria

Global Reporting Initiative (GRI) Standards.

SASB Sustainability Accounting Standard for the Containers & Packaging Industry (Version 2018-10).

Internal indicator criteria developed by Mondi and described in the section "About this report" and the relevant performance sections of the Report.

Assurance standard

ERM CVS' assurance methodology, based on the International Standard on Assurance Engagements ISAE 3000 (Revised).

ISO 14064-3:2019 for the Scope 1 and Scope 2 GHG emissions.

Assurance level

Reasonable assurance: Total energy usage, Total Scope 1 and Total Scope 2 GHG emissions for Mondi's pulp and paper mills.

Limited assurance: Total Scope 1 and Total Scope 2 GHG emissions for Mondi's converting operations, and all other scopes set out above.

Respective responsibilities

Mondi is responsible for preparing the Report and for the collection and presentation of the information within it.

ERM CVS's responsibility is to provide conclusions on the agreed scope based on the assurance activities performed and exercising our professional judgement.

Our opinion

In our opinion, the 2020 Total energy usage, Total Scope 1 and Total Scope 2 GHG emissions for Mondi's pulp and paper mills are fairly presented, in all material respects, in accordance with the reporting criteria.

Independent Assurance Statement to Mondi Group

Our conclusions

Based on our activities:

- nothing has come to our attention to indicate that the Report is not fairly presented in accordance with the Global Reporting Initiative (GRI) Standards Core Option and the Sustainability Accounting Standards Board (SASB) Sustainability Accounting Standard for the Containers & Packaging Industry;
- nothing has come to our attention to indicate that the 2020 data for the other KPIs, as listed under 'Scope' above are not fairly presented, in all material respects, with the reporting criteria;
- nothing has come to our attention to indicate that the reported progress since the 2015 baseline for those KPIs associated with a 2020 commitment (marked with * under 'Scope of our assurance engagement' above) is not fairly stated in accordance with the reporting criteria;
- nothing has come to our attention to indicate that the disclosures relating to the above KPIs in the Report are not consistently presented in the Integrated report; and
- nothing has come to our attention to indicate that the disclosures relating to GHG emissions presented in the section 'Climate change' on pages 58-60 of the Integrated report do not comply with the requirements of the UK Companies Act 2006 (Strategic Report and Directors' Report) Regulations 2013.

Our assurance activities

A multi-disciplinary team of sustainability, GHG and assurance specialists performed the following activities:

- A review of external media reporting relating to Mondi to identify relevant sustainability issues in the reporting period.
- A review of the internal reporting guidelines, including conversion factors used.
- Virtual visits to Mondi's Office in Vienna, Austria to:
 - Interview relevant staff to understand Mondi Group's Sustainable Development (SD) strategy, policies and management systems for the KPIs.
 - Interview relevant staff to understand and evaluate the data management systems and processes (including IT systems and internal review processes) used for collecting and reporting SD data.
- Verify the source data underlying the Scope 3 GHG emissions.
- Virtual visits to 11 Mondi sites in Russia, Poland (2), Czech Republic, Sweden, Finland, Austria (2), Germany (2) and Hungary to verify the source data underlying the energy usage and Scope 1 and Scope 2 GHG emissions, the other environmental and safety indicators, the indicators for certified wood and pulp, the employee and training indicators, and community and social investments.
- An analytical review and desktop testing of the year-end data submitted by all sites included in the consolidated 2020 group data for the KPIs.
- A review of selected evidence related to the design, information collection, and production of the Report in accordance with the GRI Standards.
- A review of the disclosures in the Report in accordance with the Sustainability Accounting Standard for the Containers & Packaging Industry.
- A review of the presentation of information relevant to the scope of our work in the Report to ensure consistency with our findings.
- A review of the consistency of the assured disclosures between the Report and the Integrated report.
- A review of the GHG disclosures in the Integrated report against the requirements of the UK Companies Act 2006 (Strategic Report and Directors' Report) Regulations 2013.

In addition, for the Total Scope 1 and Total Scope 2 GHG data:

- An assessment of the conclusions of accredited third-party verification bodies relating to the verification of Scope 1 GHG emissions for 2020 from Mondi's pulp and paper mills that fall within the scope of the EU emissions trading scheme (EU ETS) and checking consistency of the verified emissions with the data for these operations included in the consolidated data in the Report.
- Desktop verification of underlying source data for GHG emissions from a sample of pulp and paper mills and converting operations not covered by our site visits or the EU ETS verification process.
- A test of the calculation of the Total Scope 1 and Total Scope 2 GHG emissions and a review of the uncertainties associated with the measuring and reporting of GHG emissions data for Mondi's pulp and paper mills at site and Group levels.

Independent Assurance Statement to Mondi Group

The limitations of our engagement

The reliability of the assured information is subject to inherent uncertainties, given the available methods for determining, calculating or estimating the underlying information. It is important to understand our assurance conclusions in this context. Our independent assurance statement provides no assurance on the maintenance and integrity of the SD reporting section of Mondi's corporate website, including controls used to achieve this, and in particular whether any changes may have occurred to the information since it was first published.

Due to travel restrictions as a result of COVID-19, our assurance work for the 2020 reporting period was conducted using a combination of desk-based reviews of information and data, and virtual interviews and meetings with the Mondi corporate reporting team and the sites selected for virtual visits. We did not undertake any in-person visits to Mondi operations.

Our Observations

We have provided Mondi with a separate detailed management report. Without affecting the conclusions presented above, we have the following key observations:

- Mondi's overall safety performance in terms of Total Recordable Case Rate (TRCR) improved in 2020 compared to 2019; however, there were two contractor fatalities during the year. We strongly encourage Mondi to continue its ongoing work on safety risk identification and mitigation, engagement with contractors, training, audits and the embedding of a safety mind-set in order to reduce the risk of harm for all of its employees and contractors.
- We note the new sustainability framework (Mondi Action Plan 2030, 'MAP2030') introduced in the Report, and encourage Mondi in its development of roadmaps to define the actions required to meet its MAP2030 targets and to specify the means by which progress against each individual target will be measured over the commitment period.

Beth Wyke

Partner, Head of Corporate Assurance

23 March 2021



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ERM CVS is a member of the ERM Group. The work that ERM CVS conducts for clients is solely related to independent assurance activities and auditor training. Our processes are designed and implemented to ensure that the work we undertake with clients is free from bias and conflict of interest. ERM CVS and the staff that have undertaken work on this assurance exercise provide no consultancy related services to Mondi Group in any respect.

Glossary

Aichi Biodiversity Targets

The Aichi Biodiversity Targets were adopted by the Convention on Biological Diversity in Nagoya (Japan) in 2010, during which the parties adopted a revised and updated Strategic Plan for Biodiversity, including the Aichi Biodiversity Targets, for the 2011-2020 period.

Alliance for Water Stewardship

AWS is a global membership collaboration comprising businesses, NGOs and the public sector. AWS members contribute to the sustainability of local water resources through their adoption and promotion of a universal framework for the sustainable use of water – the International Water Stewardship Standard, or AWS Standard – that drives, recognises and rewards good water stewardship performance.

AOX

Adsorbable organic halogen compounds is a metric for emissions to water and is measured in tonnes.

BAT

Best Available Technique. Technically and economically feasible environmental technology that is efficient and advanced, generally to reduce emissions and the impact on the environment as a whole. The BAT values are defined by IPPC (The European Integrated Pollution Prevention and Control Bureau) in the 'Reference Document on Best Available Technique for the Pulp and Paper Industry'.

Biodiversity

The variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems (UN 1992).

Bioeconomy

<http://www.bio-step.eu/background/what-is-bioeconomy>
<https://www.bmbwf.gv.at/en/Topics/Research/Research-in-Austria/Strategic-focus-and-advisory-bodies/Strategies/Bioeconomy-Strategy.html>

BFP

The Boreal Forest Platform was launched in Russia by WWF Russia with the support of Mondi and Silver Taiga Foundation. The platform aims to bring stakeholders together across the boreal forest to develop a shared understanding of responsible forest management and optimise yields from commercial forests, while conserving intact forest landscapes (IFLs) and other high conservation value (HCV) areas.

Blue water

Potable, surface, second-class and groundwater.

CDP

CDP is an international not-for-profit organisation providing a global system for companies to measure, disclose, manage and share information on climate change, water security and forests.

CEP

Community Engagement Plans provide the basis of our engagement and support for local communities and are updated annually by our mills.

Cepi

The Confederation of European Paper Industries is a Brussels-based not-for-profit organisation that represents the European pulp and paper industry, monitoring and analysing activities and initiatives in the areas of industry, environment, energy, forestry, and recycling.

CFCs

Chlorofluorocarbons – a greenhouse gas.

CISL

Cambridge Institute for Sustainability Leadership is an institution within the University of Cambridge that challenges, informs and supports leaders from business and policy across complex and connected issues to deliver change towards sustainability.

CITES

The Convention on International Trade in Endangered Species is an international agreement between governments with the aim of ensuring that international trade in specimens of wild animals and plants does not threaten their survival.

Circular economy

A circular economy is an industrial system that is restorative or regenerative by intention and design. It replaces the 'end-of-life' concept with restoration, shifts towards the use of renewable energy, eliminates the use of toxic chemicals which impair reuse and aims for the elimination of waste through the superior design of materials, products, systems, and within this, business models.

CO₂e

Non-CO₂ GHGs (such as CH₄ or N₂O) can be converted into an amount of CO₂ with an equivalent warming potential. Total GHG emissions are the sum of the equivalent amount of CO₂ for each GHG, abbreviated as CO₂e.

Chain-of-Custody

Chain-of-Custody is a tracking system that allows manufacturers and traders to demonstrate that wood comes from a forest that is responsibly managed in accordance with credible standards.

COD

Chemical oxygen demand is a measure of the oxygen-consuming capacity of inorganic and organic matter present in the waste water, quantifies the amount of oxidisable pollutants in water and is measured in tonnes.

Contact water

The sum of all water volumes used on the production site for use in processes, for washing and as product input; for sanitary purpose and for non-industrial operations (e.g. in kitchens, toilets and bathrooms); and for use in boilers for steam production.

Controlled Wood

Controlled Wood is wood of known origin with a minimum risk that it is harvested in an unacceptable way. The Controlled Wood system defines the minimum standards for wood that can be mixed with FSC wood. Products made from such material can use the FSC Mix label.

Controversial sources

Mondi defines controversial sources as wood that is illegally harvested, sourced in violation of traditional and civil rights, harvested in forest management units in which HCVs are threatened by management activities, harvested in areas in which forests are being converted to plantations or non-forest use or harvested from forests in which genetically modified trees are planted.

Country-level risks

Country-level risks are identified by Mondi as a combination of indexes characterising strength of national governance (Transparency International Corruption Perception Index and the World Bank's Worldwide Governance Indicators) and prevalence of forestry-related legality issues in the country (Centralised National Risk Assessments and NEPCo Timber Risk Assessment Methodology).

Converting operations

Operations for the conversion of corrugated packaging, industrial bags, extrusions coatings, release liner, consumer packaging and advanced films.

CPI

Corruption Perception Index, an annual ranking provided by Transparency International, of countries by their perceived levels of corruption, as determined by expert assessments and opinion surveys.

DDMS

Due Diligence Management System is used to govern our approach to responsible sourcing of wood and fibre.

Deforestation

The conversion of forest to other land use independently, whether human induced or not. This definition implies permanent tree-cover loss.

EAP

Mondi's Employee Assistance Programme is a confidential hotline for supporting employees and their families on professional and private topics ranging from work and occupation, personal and family topics, to addiction and dependency, financial issues and debt counselling.

Ecosystem (ecological) resilience

The inherent ability of ecosystem to absorb various disturbances and reorganise while undergoing state changes to maintain critical functions, its normal patterns of nutrient cycling and biomass production.

Ecosystem stewardship

An action-oriented framework intended to foster the social-ecological sustainability of a rapidly changing planet, refers to responsible use and protection of the natural environment through conservation and sustainable practices.

Glossary

Ecosystem services

Ecosystem services are the multitude of benefits that nature provides to society. These include provisioning services such as food and water; regulating services such as regulation of floods, drought, land degradation, and disease; supporting services such as soil formation and nutrient cycling; and cultural services such as recreational, spiritual, religious and other non-material benefits.

The Ellen MacArthur Foundation's New Plastics

Economy initiative

An initiative led by the Ellen MacArthur Foundation to build momentum towards a plastic system that works. Applying the principles of the circular economy, it brings together key stakeholders to rethink and redesign the future of plastic, starting with packaging.

EN

An ecological network is a system of corridors and nodes which maintain compositional biodiversity and ecosystem services in an agro-forestry setting.

ERM CVS

Environmental Resources Management Certification and Verification Services is a provider of a full suite of sustainability assurance services, verification and certification of EHS programmes.

ESG

Environmental, Social and Governance.

EU ETS

European Union's Emissions Trading System.

EUTR

The EU Timber Regulation came into effect on 3 March 2013. It prohibits the placing on the EU market for the first time of illegally harvested timber and products derived from such timber.

FAO

The Food and Agriculture Organization (FAO) is a specialised agency of the United Nations that leads international efforts to defeat hunger. FAO provides sound and timely statistics related to food and agriculture and the sustainable use of natural resources or to climate change.

Forest degradation

Forest degradation is the reduction of the capacity of a forest to provide goods and socio-cultural and environmental services, which is caused by disturbances.

Forest disturbance

A temporary change in environmental conditions that noticeably alters the physical structure of a forest's ecosystem. These changes can be sudden and can have a significant impact – for example a fire or a pest outbreak.

FSC™

The Forest Stewardship Council™ is an international not-for-profit, multi-stakeholder organisation established in 1993 to promote socially and environmentally responsible management of the world's forests by way of standard setting, third-party certification and labelling of forest products.

FTSE4Good

The FTSE4Good Index Series has been designed to objectively measure the performance of companies that meet globally recognised corporate responsibility standards.

FTSE/JSE Responsible Investment Index

The FTSE/JSE Responsible Investment Index is an index series that aims to promote greater transparency by corporates on environmental, social and governance considerations, and enabling investors to integrate these considerations into investment and stewardship.

GHG

Greenhouse gases are gases listed in the Kyoto Protocol of the United Nations Framework Convention on Climate Change (UNFCCC) that contribute to the greenhouse effect.

GIS

Geographic information system is a system designed to capture, store, analyse, manage and present all types of spatial or geographical data.

GM

Genetically modified.

Green water

Rainwater stored in vegetation or soil as moisture. Water consumption during fibre growth in forests is counted and reported as green water.

Grey water

Waste water that is generated from all streams of water, which have been in contact with process chemicals.

Habitat

The place or type of site where an organism or population naturally occurs.

HCFCs

Hydrochlorofluorocarbons – a greenhouse gas.

HCV

High conservation values are biological, ecological, social or cultural values which are outstandingly significant or critically important at the national, regional or global level.

HCVRN

HCV Resource Network is a global network which promotes a practical, consistent approach to HCV methodology.

HFC

Hydrofluorocarbons – a greenhouse gas.

Human Rights Due Diligence

The process through which Mondi can identify, prevent, mitigate, and account for how we address our actual and potential adverse impacts on human rights, as an integral part of decision-making and risk management systems.

IFL

An Intact Forest Landscape is a seamless mosaic of forest and naturally treeless ecosystems within the zone of current forest extent, which exhibit no remotely detected signs of human activity or habitat fragmentation and is large enough to maintain all native biological diversity, including viable populations of wide-ranging species. IFLs have high conservation value and are critical for stabilising terrestrial carbon storage, harbouring biodiversity, regulating hydrological regimes and providing other ecosystem functions.

ILO

The International Labour Organisation is a UN agency dealing with labour issues, particularly international labour standards, social protection and work opportunities for all.

Impact

The negative or positive effect of business activity on nature (e.g on biodiversity, natural capital, etc.).

Invasive alien plants (IAPs)

Species whose introduction and/or spread outside their natural distribution threaten biological diversity. They are non-native to an ecosystem, and may cause economic or environmental harm.

ISO 14001

International standard created by the International Standards Organisation (ISO) for formal and certified environmental management systems.

ISO 45001

International standard created by the International Standards Organisation (ISO) for formal and certified occupational health and safety management.

IUFRO

The International Union of Forest Research Organizations is a non-profit, non-governmental international network of forest scientists, which promotes global cooperation in forest-related research and enhances the understanding of the ecological, economic and social aspects of forests and trees.

JSE

Johannesburg Stock Exchange Limited.

Land claims

Land claims in South Africa stem from a complex legacy of state-led forestation and forced removals of indigenous peoples, first initiated in 1913. The 1994 Restitution of Land Act aims to redress the deprivation of many indigenous South Africans of their rightful heritage. Restitution can take one of three forms, including restoration of land, payment of compensation, or a combination of the two.

Landscape approach

Balancing competing land use demands in a way that is best for human wellbeing and the environment by creating solutions that consider food and livelihoods, finance, rights, restoration and progress towards climate and development goals.

Life-altering injuries

A life-altering injury resulting in permanent or significant loss of a major body part or organ function that permanently changes or disables the person's normal life activity.

Life cycle assessment (LCA)

A methodology for assessing environmental impacts associated with all the stages of the life cycle of a product, process, or service. Environmental impacts are considered from raw material extraction and processing (cradle), through the product's manufacture, process waste disposal, logistic of raw materials and waste (gate). A cradle to grave LCA considers also the distribution of products, product use, and recycling/disposal. Mondi conducts LCAs in line with ISO 14040 and ISO 14044.

MADD

Making a Difference Day is Mondi's annual employee engagement initiative.

Major close call

An unplanned, undesired event, which under slightly different circumstances, could have resulted in a life-altering or fatal injury.

Glossary

MENP

Mondi Ecological Networks Programme is a joint programme of Mondi and the Department of Conservation Ecology and Entomology at Stellenbosch University in South Africa, which aims to undertake sound scientific research for conservation of biodiversity and maintenance of ecosystem processes concurrent with sustainable production.

Natural capital

The stock of renewable and non-renewable natural resources (for example, plants, animals, air, water, soils and minerals) that combine to yield benefits to people.

NGP

The New Generation Plantations platform was established in 2007 as a partnership between WWF and the main companies working in plantation forestry, including Mondi. It aspires to an ideal form of plantation that contributes positively to both people and nature. It promotes well-managed, inclusive and profitable plantations by sharing knowledge and experience.

Non-contact water

Water used for cooling purposes. It does not come into direct contact with any raw material, intermediate product, waste product or finished product.

NOx

Nitrogen oxide.

Operational control principle

We report emissions from operations where we have day-to-day management control over GHG emission sources, including any key sub-contracted operations which are a core part of the business. All activities of our global production operations in which we hold a minimum 50% shareholding or over which we have management control are covered.

Ozone depleting substances (ODS)

Substances that contribute to the depletion of the natural ozone layer in the stratosphere.

OHSAS 18001

An internationally applied British standard for occupational health and safety management systems, which was replaced with ISO 45001 in 2018.

Paper for recycling

Also known as 'recovered paper', this is a term used by Cepi to highlight the intended use of this secondary raw material for paper recycling only. It is defined as natural fibre-based paper suitable for recycling, consisting of paper in any shape or product made predominantly from paper, which may include other constituents that cannot be removed by dry sorting, such as coatings, laminates, spiral bindings, etc.

Paper Profile

A global, voluntary declaration scheme for presenting uniform environmental product information related to pulp and paper production that enables the professional paper buyer to make well-informed product choices.

PDI

Previously disadvantaged individuals, a term used in South Africa.

PDR

Performance and Development Review.

PE/PET

PE (Polyethylene) is the most common plastic, primarily used in packaging (plastic bags, plastic films, containers including bottles, etc.).

PET (Polyethylene terephthalate) is the most common thermoplastic polymer resin of the polyester family, primarily used for synthetic fibres and bottle production.

PEFC™

Programme for the Endorsement of Forest Certification™ is an international not-for-profit non-government organisation dedicated to promoting sustainable forest management through independent third-party certification.

PFC

Perfluorinated compounds – a greenhouse gas.

Plantation forest

Planted forest that is intensively managed and meets all the following criteria at planting and stand maturity: one or two species, even age class, and regular spacing.

Explanatory notes

1. Specifically includes: short rotation plantation for wood, fibre and energy.
2. Specifically excludes: forest planted for protection or ecosystem restoration.
3. Specifically excludes: forest established through planting or seeding which at stand maturity resembles or will resemble naturally regenerating forest.

Primary forest

Naturally regenerated forest of native tree species, where there are no clearly visible indications of human activities and the ecological processes are not significantly disturbed.

Protected area

A geographically defined area which is designated or regulated and has managed to achieve specific conservation objectives.

Recovered paper

See 'paper for recycling'.

Resilient production landscapes

Production landscapes integrating commercial forests and conservation networks that have the capacity to recover from disturbances such as climate change, intensive management, poverty-induced overuse, drought, fire, floods, pests and disease.

Scope 1 emissions

Total direct GHG emissions from sources owned or controlled by Mondi and its subsidiaries. This includes CO₂e from fossil fuels and processes, company leased/owned vehicles, waste and wastewater treatment, make-up chemicals and other GHGs.

Scope 2 emissions

Total indirect GHG emissions from sources that are related to generation of purchased energy outside the company boundaries.

Scope 3 emissions

Total indirect GHG emissions from the production of fuel and raw materials business travel; raw materials; transport of products and raw materials; and employee commuting.

SDGs

The United Nations Sustainable Development Goals, a set of universal goals that meet the urgent environmental, political and economic challenges facing our world.

SDMS

Sustainable Development Management System is used to govern our approach to sustainability and implement our sector policies.

Science-based target

A carbon emission target is defined as 'science-based' if it is in line with the scale of reductions required to keep global temperature increase below 2°C compared to pre-industrial levels.

SBTi

The Science Based Target initiative (SBTi) is a collaboration between CDP, the United Nations Global Compact (UNGC), World Resources Institute (WRI), the World Wide Fund for Nature (WWF) and one of the 'We Mean Business Coalition' commitments. It champions science-based target setting as a powerful way of boosting companies' competitive advantage in the transition to the low-carbon economy.

Secondary containment

A secondary containment is any containment serving as a barrier to limit the consequences due to the loss of primary containment (LOPC) by containing or controlling a release from primary containment. Secondary containment systems include, but are not limited to, tank dikes, curbing around process equipment, drainage collection systems or the outer wall of double-walled tanks.

SEAT

Socio-economic assessment toolbox process is a formal, strategic mechanism used by Mondi to foster an open and honest dialogue with local communities so we can improve our understanding of where our impacts lie and what our local stakeholders expect.

SHE

Safety, health and environment.

Silver Taiga Foundation

The Silver Taiga Foundation for Sustainable Development was founded in 2002 as a spin-off from the Syktyvkar branch of WWF. The main goal of the Foundation is the promotion of sustainable management of the forest landscapes and renewable natural resources in the Komi Republic and other regions of Russia.

SMEs

Small and medium-sized enterprises.

SpeakOut

Mondi's confidential reporting service and whistleblowing programme.

Specific

Measurement of emissions or consumption normalised to volume, measured in saleable production tonnes.

STEM

Science, Technology, Engineering and Mathematics (as subjects of study).

SO₂ emissions

Sulphur dioxide is an air emission arising from the combustion of fossil fuels and biomass at our on-site energy generation plants.

TCFD

The Task Force on Climate-related Financial Disclosures (TCFD) develops voluntary, consistent climate-related financial risk disclosures for use by companies in providing information to investors, lenders, insurers and other stakeholders. Physical, liability and transition risks associated with climate change are considered.



Glossary

TRCR

Total recordable case rate is calculated as the number of total recordable cases (the sum of fatalities, lost-time injuries, restricted work cases and medical treatment cases) divided by the number of hours worked per 200,000 person hours.

Transparency

The accurate, clear and complete reporting of information that facilitates collaboration and collective decision-making.

TRS

Total reduced sulphur compounds are the sum of the following reduced malodorous sulphur compounds generated in the pulping process: hydrogen sulphide, methyl mercaptan, dimethylsulphide and dimethyldisulphide expressed as sulphur. It is a metric for emissions to air and is measured in tonnes.

UK Modern Slavery Act (MSA)

An Act of the Parliament of the United Kingdom, which became a law in 2015 and was the first of its kind in Europe, and one of the first in the world, to specifically address slavery and trafficking in the 21st century.

UNEP

United Nations Environment Programme provides leadership and encourages partnerships in caring for the environment by inspiring, informing and enabling nations and people to improve their quality of life, without compromising future generations.

UNGC

United Nations Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with 10 universally accepted principles in the areas of human rights, labour, environment and anti-corruption.

U.S. Lacey Act

A United States law that bans trafficking in illegal wildlife, including plants and plant products, such as timber and paper.

VCT

Voluntary Counselling and Testing.

Water catchment

An area of land that drains rain water or snow into one location such as a stream, lake or wetland. These water bodies supply our drinking water, water for agriculture and manufacturing, offer opportunities for recreation and provide habitat to numerous plants and animals.

WBCSD

World Business Council for Sustainable Development is a CEO-led, global association of over 200 international companies dealing exclusively with business and sustainable development.

Wood fibre

A cellulosic element that is extracted from trees and used to make materials, including paper and packaging. It can be sourced in the form of wood in the rough (roundwood, solid wood), wood chips or pulp.

WRI

World Resources Institute is a global environment think tank that goes beyond research to put ideas into action with projects working on aspects of global climate change, sustainable markets, ecosystem protection and environmentally responsible governance.

WWF

WWF is one of the world's largest and most experienced independent conservation organisations. WWF's mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature.

WWF Climate Savers

A leadership programme that seeks to transform businesses into leaders of the low carbon economy.

WWF-MWSP

Formerly the WWF-Mondi Wetlands Programme, the WWF-Mondi Water Stewardship Partnership is a joint programme between WWF-SA and Mondi Limited. It is a wetland conservation programme in South Africa, the scope of which has now been extended beyond the boundaries of our own plantations to include the agricultural sector and small forest growers.



Endnotes

Introduction

Our global context Pages 13-14

- 1 <https://www.ipcc.ch/>
- 2 <https://public.wmo.int/en/media/press-release/new-climate-predictions-assess-global-temperatures-coming-five-years>
- 3 <https://www.erm.com/sustainability-report-2018/megatrends/>
- 4 <https://www.nationalgeographic.com/environment/habitats/plastic-pollution/>
- 5 <https://www.sustainability.com/thinking/2020-sustainability-trends/>
- 6 <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>
- 7 Ernst & Young Megatrends 2020 report
- 8 <https://sewi-atd.org/resources/Pictures/7%20TRENDS%20FOR%20WORKFORCE%202020.pdf>
- 9 <https://www.mckinsey.com/industries/paper-forest-products-and-packaging/our-insights/shaping-the-next-normal-of-packaging-beyond-covid-19>
- 10 <https://ecommerceguide.com/ecommerce-statistics/>
- 11 https://assets.ey.com/content/dam/ey-sites/ey-com/en_gl/topics/megatrends/ey-megatrends-2020-report.pdf

Our 10 Action Areas

1 Employee and contractor safety and health Pages 24-29

- 1 2019 figure has been restated to include the Kuopio mill and Egyptian paper bag plants acquired in 2018
- 2 Dynäs mill (Sweden) is certified to AFS 2001:01 (the Swedish Work Environment Authority's standard)
- 3 Current indicators include management risk-focused audits, first-line manager task audits, Safety, Health and Environment (SHE) professional focus audits, and peer observations. Lead indicators monitor issues that underpin safety performance, such as action tracking, critical safety training and the roll-out of the engagement board process

2 A skilled and committed workforce Pages 30-34

- 1 90% in 2015, 89% in 2018 and 88% in 2020
- 2 These figures show the PDR-relevant employees registered in our online PDR system and the total number of completed PDRs as at 31 December 2020. In addition to the use of online PDRs, which is currently not mandatory at Mondi, other PDRs across the Group are completed manually or in alternative local systems

3 Fairness and diversity in the workplace Pages 35-39

- 1 An apprentice is usually a person aged 15 to 18 years old who has agreed to work for an experienced person for three years for limited pay to learn that person's skills
- 2 The Mondi bonus is based on performance against financial, personal and safety targets. Other bonus programmes use area-specific targets as well
- 3 The 'Women's Empowerment Principles – Equality Means Business' <https://www.weps.org>
- 4 An independent review body which builds on the work of the Davies Review to increase the number of women on FTSE boards and includes a focus to improve women's representation in senior leadership positions

4 Sustainable fibre Pages 40-44

- 1 European Commission, Climate Action, Deforestation and REDD+, https://ec.europa.eu/clima/policies/forests/deforestation_en
- 2 WWF (2013). Living Forests Report: forests and wood products, <https://www.worldwildlife.org/publications/wwf-s-living-forest-report-chapter-4-forests-and-wood-products>
- 3 WWF (2020). Deforestation fronts: drivers and responses in a changing world, https://wwf.panda.org/discover/our_focus/forests_practice/deforestation_fronts/

5 Climate change Pages 45-52

- 1 The Special Report on 1.5°C from the Intergovernmental Panel on Climate Change (<https://www.ipcc.ch/sr15/>)
- 2 The target boundary includes biogenic emissions and removals from bioenergy feedstocks. In 2019, science-based targets replaced our previous targets
- 3 <https://www.fsb-tcdf.org/>
- 4 The International Energy Agency's 2°C scenario (2DS) is based on limiting global temperature rise to below 2°C above pre-industrial levels under an emissions trajectory that allows CO₂ emissions to be reduced by almost 60% by 2050 compared with 2013. Under this scenario, emissions are projected to decline from 2020 and they will continue their decline after 2050 to reach carbon neutrality
- 5 The Representative Concentration Pathway's 8.5 (RCP8.5) scenario is a business-as-usual scenario, which projects the global mean temperature to rise by 2.6 to 4.8°C and the global mean sea level to rise by 0.45 to 0.82 metres by the late-21st century
- 6 Short term: 1-3 years, mid-term: 3-7 years, long term: 7+ years
- 7 Our CDP climate change disclosure 2020 response represents the status of TCFD risks and opportunities in 2019. The identified climate-related risks and opportunities have been revised in 2020. The SD Report and IR Report contain the Group's most recent and current risks and opportunities
- 8 The boundary of our targets includes biogenic emissions and removals from bioenergy feedstocks
- 9 For details see www.wemeanbusinesscoalition.org/companies/
- 10 In our calculation of the electricity self-sufficiency of our mills, we include energy sales from those mills. The total is the average across all of our operations, but this does not mean that each individual operation is electricity self-sufficient
- 11 For the calculation of the specific 2014 baseline, we excluded divested mills; the absolute 2014 figure includes divested mills
- 12 The specific GHG emission of our mills per tonne of saleable production includes GHG emissions related to manufacturing (0.51 t/t) and to energy sales (0.13 t/t)
- 13 27 of our converting operations, which account for 51.7% of the total converters' electricity purchased, report their Scope 2 emissions using market-based factors. These 27 converters contribute 53.2% of total converting operations' Scope 2 emissions. The remaining converting operations use location-based (country-specific) average grid factors to calculate their Scope 2 emissions
- 14 Confederation of European Paper Industries (Cepi), Framework for Carbon Footprints for paper and board products (April 2017); <https://www.cepi.org/framework-for-carbon-footprints-for-paper-and-board-products/>

6 Constrained resources and environmental impacts Pages 53-60

- 1 We report specific performance by dividing the absolute Group performance per saleable production volume
- 2 www.unep.org/resourceefficiency/
- 3 In support of the EU's Directive on Industrial Emissions (IED, 2010/75/EU), Best available techniques (BAT) reference documents, the so-called BREFs have been published under <https://eippcb.jrc.ec.europa.eu/reference>
- 4 Introducing the precautionary approach, Principle 15 of the 1992 Rio Declaration states that 'where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation'
- 5 <https://a4ws.org>
- 6 <https://waterriskfilter.panda.org>
- 7 R. Oel, A.Y. Hoekstra: The green and blue water footprint of paper products (July 2010)
- 8 See the glossary for definitions
- 9 We define water stress according to the Food and Agriculture Organization (FAO) definition. Between 1,000-1,700 m³/year per capita indicates 'water stress', 500-1,000 m³/year 'chronic water scarcity' and less than 500 m³/year 'absolute water scarcity'
- 10 The boundary between the soil surface and the area where groundwater saturates spaces between sediments and cracks in rock
- 11 Included are South Africa, Poland and Czech Republic, according to FAO's Aquastat 'Total renewable water resources per capita' (<http://www.fao.org/aquastat/en/>)
- 12 JRC Technical Reports, 2018 – Drought and Water Crisis in Southern Africa
- 13 South Africa
- 14 Includes waste water from third parties
- 15 <https://eippcb.jrc.ec.europa.eu/reference/>
- 16 It exhibits one or more of the following characteristics: toxic; carcinogenic; infectious; teratogenic; mutagenic; eco-toxic; explosive; irritable; corrosive; or reactive (see also Basel Convention Annex III) and is classified as such, according to local national legislation
- 17 The 2015 baseline of 38.28 kg/t excludes divested mills: Pine Bluff and Raubling
- 18 All environmental incidents are recorded, categorised and classified according to our 'Guide to Major Incident Cause Evaluation (MICE)'
- 19 We reported this environmental incident in our 2019 SD Report on page 65
- 20 A major environmental incident, previously called a Level II environmental incident, is any occurrence that has actually resulted in the loss of primary containment of at least 1 kg of a GHS hazard category 1 substance or >10kg of all other GHS classified substances. GHS is the 'Globally Harmonized System of Classification and Labelling of Chemicals' used to categorise chemicals by their hazardous characteristics. GHS is an internationally agreed upon system, created by the United Nations



Endnotes

7 Biodiversity and ecosystems Pages 61-65

- 1 WEF (2021), The Global Risks Report 2020, <https://www.weforum.org/reports/the-global-risks-report-2020>
- 2 IPBES (2019), Global Assessment Report on Biodiversity and Ecosystem Services, <https://ipbes.net/global-assessment>
- 3 FAO, Forestry Communication Toolkit, <http://www.fao.org/forestry/communication-toolkit/93682/en/>
- 4 The total area of forest leases in Russia increased by 229,415 hectares in 2020 compared with 2019, due to additional forest leased areas granted by the State to support Mondi's investment project, "Horizon", to modernise and increase the Syktyvkar pulp and paper mill's production capacity
- 5 CBD COP 10 (2010), The Strategic Plan for Biodiversity 2011-2020, <https://www.cbd.int/sp/targets/>
- 6 WWF (2018), Precedent-setting moratorium, <https://wwf.panda.org/?326513/Precedent-setting-moratorium-helping-protect-over-a-million-hectares-of-intact-boreal-forest>
- 7 Key information sources include: IBAT – Integrated Biodiversity Assessment Tool, World Database of Key Biodiversity Areas – managed by BirdLife international, BirdLife's Data Zone, The IUCN Red List of Threatened Species, IPBES – Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services; data on land use and land cover, physical environmental information: topography, geology, soil types, rainfall and climate data; research on the applicable legislative framework at country level concerning biodiversity, ecosystems and their services; research on NGOs working on issues of biodiversity, conservation, climate change, research on conducted biodiversity and ecosystem conservation initiatives

8 Supplier conduct and responsible procurement Pages 66-70

- 1 Direct suppliers that were active in 2020 with at least one purchase order, grouped into single entities
- 2 Key suppliers are categorised as high spend suppliers delivering their goods and services to more than one Mondi site, with the biggest share of strategic and captive suppliers
- 3 Local suppliers of products and services are defined as suppliers that are located close to our significant operations (all Mondi production sites such as mills and converting plants) within the same country
- 4 Identified as being high-risk in one or more of the sustainability risk areas: labour rights, climate change, water and biodiversity

9 Relationships with communities Pages 71-77

- 1 Located in Russia, South Africa, Poland, Czech Republic, Slovakia, Bulgaria, Turkey, Finland, Sweden and Austria
- 2 As new claims may be added, or existing claims de-gazetted, or due to land acquisitions and disposals, this figure may change in future
- 3 Based on settled land (in hectares) out of a total of gazetted, pre-gazette and settled land
- 4 Based on the total of pre-gazette and gazetted land out of current owned land holdings
- 5 These are existing or long-standing initiatives. In those instances where an initiative was launched in 2020, it's mentioned as such
- 6 <http://www.mondizimele.co.za>
- 7 <https://www.unenvironment.org/thinkeatsave/get-informed/worldwide-food-waste>

10 Solutions that create value for our customers Pages 78-83

- 1 76% of our product portfolio based on revenue is made up of products that are reusable, recyclable or compostable. This percentage includes mono-material plastics designed for recycling and all products consisting of at least 95% paper and therefore deemed widely recyclable. Additional Mondi products with lower fibre content may also be recyclable in certain systems, but have not been included
- 2 Cefpi (2017), <https://www.cepi.org/framework-for-carbon-footprints-for-paper-and-board-products/>
- 3 International Council of Forest and Paper Association (ICFPA). (2018). Sustainability Report 2019. Retrieved October 16, 2020 from <https://icfpa.org/resources/>
- 4 European Commission (2019), https://ec.europa.eu/info/publications/communication-european-green-deal_en
- 5 https://ec.europa.eu/environment/waste/packaging/ongoing-review-packaging-waste-directive_en.htm
- 6 <https://www.ellenmacarthurfoundation.org/our-work/activities/new-plastics-economy>
- 7 <https://www.mondigroup.com/en/newsroom/media-centre/press-releases/2019/mondi-confirms-its-commitments-in-first-new-plastics-economy-global-commitment-report/>
- 8 <https://www.cepi.org/policy-area/sustainability-circularity/>
- 9 WWF Environmental Paper Company Index, <https://epci.panda.org/results/mondi>
- 10 Accreditation Austria ID 0404
- 11 The food hygiene standards that Mondi's operations are certified against include: ISO 22000, EN 15593, BRC, HACCP and AIB

Governance & Stakeholder engagement

Sustainability governance Pages 88-91

- 1 Employees in sales and marketing roles and those in positions that have, or may have, contact with competitors

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Our 2020 suite of reports

Please visit our Group website where copies of our reports can be downloaded:

www.mondigroup.com/reports20



Integrated report and financial statements 2020

A balanced overview of Mond's performance in 2020 and insight into how our approach to strategy, governance, people and performance combine to generate value in a sustainable way. Also available online at:

www.mondigroup.com/ir20



Sustainable Development report 2020

A comprehensive view of our approach to sustainable development and our performance in 2020.

Available online as a PDF at:
www.mondigroup.com/sd20

Sustainable Development Management System (SDMS)

Sustainable Development Policies

The Sustainable Development Policies ('Policies'), which form part of our Sustainable Development Management System (SDMS), outline our overall approach and key issue-specific sustainability areas of focus and provide the essential framework requirements that set out clearly where we stand on sustainable development.



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Sustainable Development Governance Policy

We consider sustainable development (SD) as an integral component of our business and look to manage our risks and opportunities through robust policies, standards and management systems.

For Mondi, sustainable development means responsible management and sourcing of our natural resources; managing our social and environmental impacts on ecosystems, communities and people; driving resource efficiency in our products and processes; being part of the solution to global challenges such as climate change that affect business and livelihoods; and working with our stakeholders for an inclusive and fair value chain.

To meet our objectives, we will:

- Maintain compliance with local, regional and national laws and regulations
- Implement relevant international industry best practice and standards where appropriate
- Set time-specific, measurable and publicly communicated targets to meet our policy requirements
- Identify, assess, manage, review and report SD risks and opportunities on a regular basis
- Effectively and publicly communicate our Policies to all employees, contractors and suppliers as appropriate. Policies will be made available to employees in a number of relevant languages
- Provide the appropriate resources, training and education to all our operations to ensure our employees and any contractors working on a Mondi site understand and meet our requirements
- Regularly monitor, review and evaluate our performance in relation to our requirements
- Report our progress publicly in an open and transparent manner through relevant channels
- Commission third party assurance on selected key performance indicators as part of our annual public reporting process
- Set corrective actions and measures where appropriate to ensure continuous improvement in our performance
- Audit performance against our requirements
- Implement internationally recognised certification and management systems where appropriate
- Support the global sustainable development agenda and be guided by international conventions, agreements and standards in our approach, including the UN Sustainable Development Goals, UN Global Compact, the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the Global Reporting Initiative
- Build strong working relations and form partnerships with government, non-governmental organisations (NGOs), academic institutions, local communities and other relevant stakeholders at global, regional and local levels to support transparency, exchange knowledge and learnings, raise awareness, mitigate negative impacts, seek joint solutions and participate in developing good practices
- Ensure the Policies are reviewed annually by the Board to ensure they remain current and appropriate to the nature and scale of our business and developments in our external context



Accountability

The Board SD Committee sets the governance approach for sustainable development, approves the strategy, reviews performance and ensures that the Group's approach is aligned with global best practice and that all decisions and actions of our business are based on integrity, responsibility, accountability, fairness and transparency.

Scope and boundary

All facilities and activities that we own and operate (including those in which we hold a controlling interest) and all activities undertaken by contractors on Mondi sites or while under our management control are required to comply with our Policies, where appropriate and relevant.

We will require suppliers to meet the requirements set out in our Code of Conduct for Suppliers and we will exercise due diligence prior to the introduction of new projects, operations, practices, process and products and set time-bound plans for new businesses to comply with our Policies.

Grievance

We will maintain readily accessible grievance mechanisms in each country in which we operate to allow internal and external stakeholders to raise any grievances or concerns. All grievances and concerns raised will be recorded and actively investigated to facilitate a satisfactory resolution. We will ensure that no one will suffer for raising with management any violations of our Policies, or any legal or ethical concerns. We will regularly monitor the effectiveness of our grievance mechanisms.

We have eight issue-specific Policies in the following key SD areas:

- Safety and occupational health
- Labour and human rights
- Sustainable forestry
- Energy and climate change
- Environment
- Supply chain and responsible procurement
- Product stewardship
- Communities

Andrew King, Group CEO, January 2021

Safety and Occupational Health Policy

We value human life above all else and protecting the safety, health, mental wellbeing and security of our employees and those who work on our behalf is a core value for Mondi. We believe that one injury is one too many.

We are striving to be a business without fatalities and life-altering injuries or occupational diseases. We have a systematic approach in focusing on our top fatal and life altering risks in all our operations and strive to engineer these risks out and implement robust controls.

We aim to have no incidents that harm people or put our neighbours or operations at risk. We can achieve our objective of everybody returning home safely through strong accountable leadership and a culture that creates a work environment where employees and contractors are able to work safely with a focus on engagement, identifying hazards, implement appropriate risk controls and measure control effectiveness regularly.

We comply with applicable laws and are guided by internationally recognised principles. Through effective safety management, we work to ensure that all our operations have fundamentally safe, well-designed plant, equipment and infrastructure.

We take responsibility for the development and implementation of local safety and health management systems and to meet our objectives, we will:

- Meet all relevant local, national and regional laws and regulations
- Act in accordance with internationally declared human rights and standards, including the UN Sustainable Development Goals, the ten principles of the United Nations Global Compact, the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- Set non-negotiable performance requirements for material risk, validate training and competencies and ensure processes are effectively implemented by adopting standards, practice notes and performance requirements, designed to provide a safe and healthy working environment for all
- Identify hazards and assess the risks associated with our operations
- Develop and implement operational controls to mitigate effectively the impact of those risks
- Monitor and maintain our hazard recognition, risk assessment and operational control activities to ensure they are current and effective
- React to correct gaps in our controls and continuously improve system stability
- Deliver continuous improvement in our performance through effectively identifying hazards and reducing risks and impacts
- Work towards ISO 45001 certification at all our mills and ensure the relevant certifications at our converting and forestry operations

- 
- Expect our managers to provide effective leadership by ensuring that all managers, employees and contractors are aware of these commitments and are educated, trained and motivated on their specific responsibilities as a condition of employment or contract
 - Consider the psychological and social dynamics of individuals and teams in our overall safety and health approach and continuously promote an interdependent safety culture where everybody looks after their own safety as well as that of others
 - Prepare for emergencies with open communication of our safety, security and health risks and concerns to assure emergency preparedness and community right-to-know
 - We recognise the human tragedy caused by the HIV/Aids epidemic and have a clear programme for addressing HIV/Aids in the workplace in our South African operations

Andrew King, Group CEO, January 2021

Labour and Human Rights Policy

Mondi respects and supports internationally proclaimed human rights. We work to guard against complicity in human rights abuses and comply with all applicable labour and employment laws. We are guided by relevant internationally recognised principles. Further related information is included in the Supply Chain and Responsible Procurement Policy, the Communities Policy, Code of Conduct for Suppliers and the Business Integrity Policy.

Where local legislation conflicts with this Policy, we will uphold our commitment to human rights without compromising our respect for the law and provide examples of good practice through our own business conduct.

To meet our objectives, we will:

- Meet the relevant local, national and regional laws and all relevant international treaties and agreements
- Act in accordance with internationally declared human rights and standards, including the UN Sustainable Development Goals, the ten principles of the United Nations Global Compact, the International Bill of Human Rights, the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the UN Guiding Principles on Business and Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the ILO's eight fundamental conventions
- Undertake human rights assessments, drawing on existing best guidance, to identify those areas of our business where there may be higher risk of human rights abuse, including modern slavery, forced labour and human trafficking
- Communicate and report on our human rights impacts, and on progress made in identifying, mitigating and remedying violations
- Avoid causing or contributing to modern slavery and other adverse human rights impacts through our own activities, and address such impacts - if they do occur - in a timely and appropriate manner
- Seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products or through our business relationships
- If we identify that we have caused or contributed to adverse human rights impacts, provide for or cooperate in their remediation through legitimate processes



With regard to our employees, we will:

- Ensure that all work is voluntary, and that employees are free to leave work or terminate their employment upon notice, in line with mandatory and contractual regulations, and that all employees have employment contracts or terms and conditions outlining their rights and obligations if required by law
- Promote equality of opportunity in the workplace and value diversity in our employees and seek to eliminate all forms of discrimination and harassment, including those on the grounds of gender, marital or parental status, ethnic or national origin, race or colour, social background, sexual orientation, religious belief, political opinion, age, disability, HIV status or union membership
- Ensure that no one will be discriminated against in access to employment and particular occupations, or in their conditions of employment, such as recruitment, remuneration, access to promotions, hours of work and rest, job assignments, training and vocational guidance on the grounds of the above-mentioned attributes
- Close gender pay gaps that may exist by implementing equal remuneration for work of equal value, without discrimination on grounds of gender or marital status, with regard to pay and conditions of remuneration
- Not tolerate any instances of child labour. We do not employ persons below the age of 15 or the local minimum employment or mandatory schooling age, whichever is higher
- Ensure that special protections are in place for young workers (those below the age of 18 and above legal minimum working age)
- Not tolerate any inhumane treatment of employees, any form of forced labour, modern slavery, human trafficking, physical punishment or other abuse
- Consider vulnerable groups in our workforce, including migrant and temporary workers
- Protect the health and safety of our employees, and promote their wellbeing
- Provide a secure working environment
- Provide fair wages, working hours and benefits that at least meet legal or industry minimum standards, and in the geographies where legal or industry standards are not aligned with Mondi's standards or those set out in the relevant ILO conventions, work with the relevant experts and local stakeholders such as trade- and labour unions to determine and provide fair working hours and living wage
- Respect the right of all employees to form and join trade unions of their choice and to bargain collectively without fear of retaliation or discrimination. Those situations in which the right of freedom of association and collective bargaining are restricted under law, we will facilitate and not hinder parallel means of independent and free association and bargaining. We will ensure that such employee representatives are not the subject of discrimination and that representatives have access to their members in the workplace
- Promote a culture that fosters workplace flexibility and work/life balance
- Invest in Mondi employees by providing development opportunities and encouraging continual learning



- Encourage employees to take personal responsibility for ensuring that our conduct complies with our principles and Policies
- Ensure our operations respect international human rights when operating in jurisdictions where local law or the enforcement of it falls short of international human rights standards

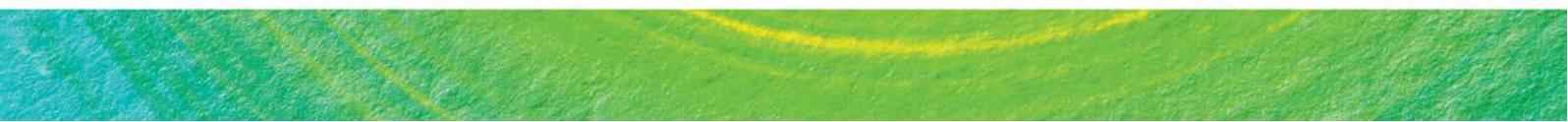
With regard to our suppliers, we will:

- Require our suppliers to commit to our Code of Conduct for Suppliers and engage with suppliers on their human rights impacts in order to encourage them to meet internationally declared human rights standards
- Seek to establish commercial relationships with suppliers that share and adhere to our commitments on human rights

With regard to our communities, we will:

- Through the application of our Communities Policy, seek to understand and appropriately manage any human rights impacts that we may have on the local communities in which we operate

Andrew King, Group CEO, January 2021



Sustainable Forestry Policy

We acknowledge our responsibility to manage the forests we own and lease in an economically, environmentally and socially sustainable way, while meeting wood and fibre productivity challenges, now and in the future. Our business and ecosystems are inextricably linked. Our forestry practices have an impact on ecosystems, natural landscapes and biodiversity while our businesses and local communities rely on ecosystems for the provision of services such as water, climate regulation and fibre. We are not party to deforestation, we comply with all applicable laws and we are guided by relevant internationally recognised principles.

In the production landscapes where we operate we aim to optimise yields from our commercial forest areas while maintaining important biodiversity and ecosystem processes, improving the resilience of our forestry operations in the wider landscape.

With regard to our forestry management practices, we will:

- Meet the relevant local, national and regional laws and all relevant international treaties and agreements, including zero deforestation, no illegal logging, and no use of illegal wood as well as species listed by the Convention of International Trade on Endangered Species (CITES)
- Act in accordance with internationally declared principles and standards, including but not limited to the UN Sustainable Development Goals and the ten principles of the UN Global Compact
- Promote sustainable forest management, including afforestation, reforestation of harvested areas and maintaining the carbon stocks of the forests
- Continually strive for an increasing volume of sustainable wood/fibre per unit of area by using latest technologies and practices supported by sound research and science
- Understand, assess and actively manage the impacts of our forest operations on the people and landscapes in which they are located
- Maintain Forest Stewardship Council™ (FSC™) forest certification and ISO14001 environmental certification at all our owned and leased forests
- Not convert natural forests to exotic forest plantations
- Recognise, respect and protect the customary, traditional and civil rights and laws of indigenous peoples and local communities, and actively engage with these groups to ensure we take their views into account
- Ensure that land use rights for forestry operations are clearly defined and established
- Publicly disclose information on our forestry management performance through CDP and other relevant channels



We understand that our forest operations are part of a wider landscape and to demonstrate active sustainable stewardship of land and freshwater ecosystems, we will:

- Develop and implement Ecosystem Management Plans/Biodiversity Action Plans for all our forest operations, incorporating input from relevant stakeholders
- Identify sites of special ecological, geological, cultural and historical importance and manage them in a manner appropriate for their unique features
- Set aside and report appropriate proportion of our owned and leased forest areas for conservation purposes
- Identify and protect threatened and endangered species, including those listed in the IUCN Red List of Threatened Species
- Proactively identify and support the protection of Intact Forest landscapes (IFLs)
- Proactively identify High Conservation Value (HCV) areas, connecting corridors and other areas of conservation significance within and beyond our borders and strive to maintain or enhance the critical environmental and social values of these ecosystems
- Not harvest in World Heritage areas and IUCN Category I-IV protected areas or in UN Protected Sites in line with the UN Convention on Biological Diversity
- Promote, support and invest in research and innovation in forests and associated ecosystems for improved management that reflects the values of water, soil, ecosystems and biodiversity
- Understand, support and promote the sustainable and efficient use of all forest resources and associated ecosystem services

Andrew King, Group CEO, January 2021

Energy and Climate Change Policy

Mondi shares the concerns of the international community about climate change and believes that industry should play an important role in worldwide efforts to reduce greenhouse gas emissions. We comply with all applicable laws and are guided by the relevant internationally recognised principles.

Our overall objective is to drive improvement in our energy and carbon efficiency by working within our own operations and through engagement with external stakeholders.

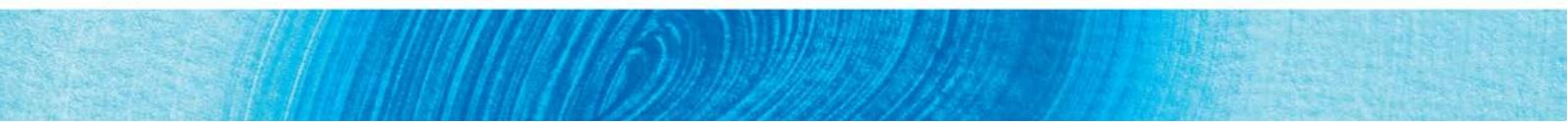
In order to achieve our objectives, we will:

- Meet the relevant local, national and regional laws and all relevant international treaties and agreements
- Act in accordance with internationally declared principles and standards, including but not limited to the UN Sustainable Development Goals and the ten principles of the UN Global Compact
- Manage the regulatory, reputational and/or market risks related to climate change
- Further develop our energy management systems and improve the energy and carbon efficiency of our production processes
- Maximise the already significant use of Combined Heat and Power
- Invest in the electricity self-sufficiency of our pulp and paper mills
- Promote the cascading use of wood products principle and the use of residues and by-products from the process for energy generation
- Further reduce our carbon footprint by increasing the use of renewables, such as biomass-based fuels, for generation of energy, where feasible
- Ensure all new energy investments at our pulp and paper mills implement Best Available Techniques (BAT)
- Monitor the carbon footprint at our pulp and paper mills according to the WRI/WBCSD Greenhouse Gas (GHG) Protocol standards, including our Scope 1 (direct) emissions, Scope 2 emissions (indirect emissions from purchased electricity and heat), and Scope 3 emissions (from sources not owned by Mondi but occurring as a result of our activities) and commit to science-based GHG reduction targets
- Reduce our indirect GHG emissions (Scope 3) from our raw material and final product transportation



- Develop and provide carbon-based Life Cycle information for our products in accordance with recognised standards
- Publicly disclose information on our energy and carbon footprint to CDP and other relevant channels
- Support carbon pricing and market mechanisms and implement where feasible, projects that will deliver carbon credits, subject to their environmental integrity
- Promote the role of responsibly managed forests in absorbing and storing carbon

Andrew King, Group CEO, January 2021



Environment Policy

We actively strive for recognised best environmental performance in our operations, recognising the production efficiencies that can be achieved through good environmental management. We comply with all applicable laws and are guided by the relevant internationally recognised principles.

We apply a precautionary approach in our decision-making and integrate environmental principles into our business strategy.

In order to achieve our objectives, we will:

- Meet the relevant local, national and regional laws and all relevant international treaties and agreements
- Act in accordance with internationally declared principles and standards, including but not limited to the UN Sustainable Development Goals, the ten principles of the UN Global Compact and the UNGC CEO Water Mandate and adhere to UNEP's principles of Resource Efficiency and Cleaner Production
- Apply the principles of circular economy by driving resource efficiency within our own operations and through engagement with stakeholders
- Minimise our impact on the environment; from the use of natural resources to the management of our emissions, discharges and wastes, also considering our indirect impacts, such as those from the supply of raw materials and logistics

With regard to resource efficiency, we will:

- Provide Life Cycle information on the environmental footprint of our products and promote the resource efficiency of our production processes, raw materials, water, energy, recycling and the cascading use of wood and forest products
- Reduce waste to landfill and promote secondary use of by-products, and improved recycling rates
- Acknowledge that access to fresh water, sanitation and hygiene is recognised by the UN as a fundamental human right and be guided by the principles of the UN CEO Water Mandate as we manage our water footprint throughout all stages of operation, and establish specific water goals to drive efficient use of water
- Conduct and maintain updated water impact assessments for all our pulp and paper mills and forestry operations to help better manage our water footprint and protect water resources
- Place additional focus in water stressed areas on common water concerns and promote collective action on shared challenges, including educating stakeholders, such as suppliers and customers, on water issues



With regard to minimising environment impacts, we will:

- Promote and invest in innovation and clean technology
- Understand our operations' impact on the environment in terms of waste generated, air emissions, water discharges and other impacts such as noise, and establish plans and set targets to minimise these impacts
- Substitute hazardous chemicals in processes and products with non-toxic or less toxic process chemicals and raw materials, in accordance with BAT standards
- Design products and production processes to reduce the quantity and hazardous characteristics of our emissions, discharges and waste
- Ensure all new projects at our pulp and paper mills implement Best Available Techniques (BAT) including waste and wastewater treatment and the handling and storing of chemicals
- Evaluate existing pulp and paper mills against BAT and determine a timescale for implementation of BAT
- Develop, implement and maintain ISO 14001 certified environmental management systems at all our pulp and paper mills and forestry operations
- Publicly disclose information on our environmental performance, through participation in the WWF Environmental Paper Company Index, CDP and other relevant channels
- Prevent the occurrence of environmental incidents and complaints, but when they do occur, report and thoroughly investigate them, and put measures in place to avoid recurrences

Andrew King, Group CEO, January 2021

Supply Chain and Responsible Procurement Policy

Responsible sourcing is a powerful tool for driving sustainable values and practices throughout the value chain. We aim to promote responsible conduct along our supply chain and comply with all applicable laws, and are guided by the relevant internationally recognised principles.

Supply chain transparency and sustainability are integral principles of supplier management in Mondi. We take a risk-based approach to manage sustainability issues and work for continuous improvement in the visibility and sustainability performance in our supply chains.

With regard to our supply chains, we will:

- Meet the relevant local, national and regional laws and all relevant international treaties and agreements, including the UK Modern Slavery Act
- Act in accordance with internationally declared principles and standards, including but not limited to the UN Sustainable Development Goals and the ten principles of the UN Global Compact
- Require all Mondi suppliers, their representatives and subcontractors to adhere to the Code of Conduct for Suppliers, which sets out our minimum requirements for environmental, ethical and social performance
- Assess suppliers against a range of sustainability criteria to determine their overall level of risk to the environment, their workforce, their local communities, and to Mondi
- Undertake in-depth sustainability performance reviews, including audits and other assessment methods for selected high-risk suppliers and support them in improving their risk management performance
- Offer training, support and long-term partnerships to local businesses and forest owners, particularly small and medium enterprises
- Explore opportunities for business enterprise development and preferential procurement from local suppliers

If a supplier is not able to meet our minimum requirements, we will work with them to implement appropriate corrective actions, and reserve the right to suspend sourcing from the supplier until we are satisfied with their performance.



Procurement of fibre

Securing access to sustainable and credible sources of fibre to meet the needs of our business in the short, medium and long term is one of our most significant issues. We are committed to sourcing wood and fibre only from responsibly managed forests, including a commitment to zero deforestation and illegal logging.

For all wood, virgin fibre, biomass and finished wood-based products (together “fibre”), we will:

- Address the requirements of the EU Timber Regulation (EUTR), the U.S. Lacey Act and any other relevant regulations and implement risk-based due diligence processes to verify our adherence with these requirements
- Implement and maintain Forest Stewardship Council™ (FSC™) - and/or PEFC-Chain-of-Custody certification systems at all our pulp and paper mills. New acquisitions will be required to meet this commitment within an agreed timeframe
- Source fibre that is certified to FSC™ or PEFC™ or a credible alternative wherever feasible. We aim to increase over time the proportion of credibly certified sourced fibre
- Ensure that all non-certified fibre procured meets the standard for Controlled Wood as a minimum
- Purchase only elemental chlorine free and total chlorine free bleached pulp
- Not source from forests in which there are knowingly any activities that are against the principles of the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work

We will continue to actively work with the global certification schemes, other sectors and suppliers to develop more efficient, cost-effective and risk-based certification that reflects local needs, different forest types and scale of operation, while improving transparency and monitoring at landscape level.

Procurement of other raw materials and services

Mondi has a responsible procurement process in place to ensure there is consistency in the assessment, selection, monitoring and management of Mondi’s suppliers of these raw materials and services. The system enables us to identify and develop strategic partners, build long-term relationships and help mitigate the impacts of our supply chain and our products.

We will continually review our supplier relationship management system in order to ensure consistency in approach across our business and to ensure that we are effectively managing our supply chain.

Andrew King, Group CEO, January 2021

Product Stewardship Policy

We support a shift towards sustainable consumption and production patterns through the integrated management of environmental, safety and health factors, throughout all stages of the value chain and product life-cycle – from the origin of raw materials and their procurement and manufacturing, to product design, use and next life. We comply with all applicable laws and are guided by the relevant internationally recognised principles. We strive to create sustainable value for our customers and wider society. Through sustainable products, we aim to help address some of the global challenges such as climate change, scarce resources, food waste and plastics leakage into the environment.

To meet these objectives, we will:

- Meet the relevant local, national and regional laws and all relevant international treaties and agreements
- Act in accordance with internationally declared principles and standards, including but not limited to the UN Sustainable Development Goals and the ten principles of the UN Global Compact
- Seek responsible, resource-efficient ways to source, manufacture, reuse, recycle or dispose our products
- Ensure our products and operations meet all applicable safety, health, hygiene standards and other regulations
- Drive innovation in our products and processes, and through our products look to help our customers with their own and their consumers' sustainability challenges; in particular, the transition to a circular plastics economy
- Promote responsible purchasing in our markets through value-adding, sustainable products

With regard to sourcing and manufacturing, we will:

- Source fibre that is certified to Forest Stewardship Council™ (FSC™) or PEFC™ wherever feasible
- Ensure that all non-certified fibre procured meets the standard for Controlled Wood as a minimum
- Assess our suppliers for responsible conduct according to our Policies and standards and work with them to address any gaps
- Minimise waste and emissions in our operations for cleaner, resource-efficient production processes

Please also see our Supply Chain and Responsible Procurement and Environment Policies.



With regard to product standards and regulations, we will:

- Offer our customers high-quality packaging and paper solutions that comply with all relevant health and safety requirements
- Implement and maintain relevant certification at our operations based on requirements for different sectors and applications as appropriate
- Communicate product certification and production and sourcing standards through our own and other recognised product labelling schemes

With regard to innovation and engagement, we will:

- Undertake research and development to innovate in our product design to create sustainable value, and deliver efficiencies in our production processes
- Work with our customers to meet their needs and design products that reduce overall environmental and social impacts and help to meet sustainability objectives in the countries in which they are sold – such as recycling, low-carbon economy, resource efficiency, minimising pollution, and eliminating food waste

With regard to responsible purchasing and consumption, we will:

- Continue to bring to market new and innovative products that help tackle global sustainability challenges such as climate change, scarce resources, food waste and plastics leakage into the environment
- Continue to improve, communicate and promote the sustainability value of our products to encourage responsible purchasing

We will engage closely with our customers to communicate the sustainability value of our products to allow our customers to make informed choices, and regularly update our understanding of their sustainability needs, using paper where possible, plastic when useful. We will measure their satisfaction through regular surveys, and use the results of these surveys to make improvements to our design, production, labelling, distribution and management processes.

Andrew King, Group CEO, January 2021

Communities Policy

Our operations are at the heart of the communities in which they are located and we recognise that a thriving local community is essential for us to continue to prosper. We play a key socioeconomic role in communities. Above all, this is realised through creating wealth, employment and business opportunities, and through local and regional taxes. In addition, we facilitate, invest and participate in initiatives and projects that add further value to communities and support their development.

We comply with applicable laws and are guided by the relevant internationally recognised principles.

Through targeted support, based on a sound understanding of the local communities, we aim to make a positive, sustainable impact that strengthens our communities and benefits our company and employees.

To meet these objectives, we will:

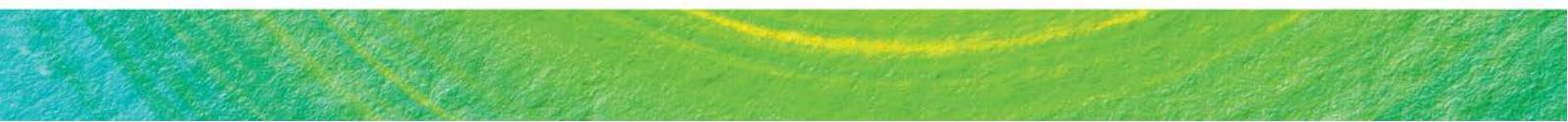
- Meet the relevant local, national and regional laws and all relevant international treaties and agreements
- Act in accordance with internationally declared principles and standards, including but not limited to the UN Sustainable Development Goals, the ten principles of the UN Global Compact, the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and in our forest communities, the principles of Forest Stewardship Council™ (FSC™)
- Promote strong relationships with the communities of which we are a part, including those affected by our activities, directly or indirectly, temporarily or permanently, and positively or negatively
- Seek regular engagement about issues that may affect these communities and understand the priorities of local people
- Support livelihoods, particularly in rural communities associated with our forestry operations
- Recognise the importance of diversity in our communities, and understand the differing needs of groups within our communities, including age, gender, class, ethnicity and other factors
- Recognise the sensitivities involved in addressing issues related to the cultural heritage of indigenous communities, and address such issues in a spirit of respect, trust and dialogue
- Ensure our social investments – from direct investment in community infrastructure to support for local enterprise – are guided by the development needs of local people, principles of sustainable development and our own business objectives in the countries we operate in
- Specifically target initiatives and investments that support key drivers of development in communities – including education, enterprise development and job creation, environmental protection, community health and cohesion, infrastructure and public services and additional (voluntary) employee benefits



To address priority issues within our communities, we will:

- Understand the full range of resources, skills and networks that are available to Mondi and how these may best be used to support communities; this may include Mondi's know-how and expertise, and our ability to bring different stakeholders together to facilitate community development.
- Undertake at our operations, as and when considered necessary, a Mondi socioeconomic assessment toolbox (SEAT) process.
- Develop at our operations, as and when considered necessary, Stakeholder Engagement Plans (SEPs) that set out how we will engage with and support communities to help meet their priority needs
- Measure, where feasible and meaningful, the impact and ultimate value of our engagement, initiatives and investments, for a more targeted and strategic approach

Andrew King, Group CEO, January 2021





Document control

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Group Business Integrity Policy

Introduction

Regrettably, bribery and corruption is a feature of corporate and public life in many countries across the world. Even the suggestion of corruption may damage the reputation of a company or Group and affect its ability to do business. Regional and international institutions, such as the OECD, the United Nations and the African Union, have responded to fight the negative impact of corruption with conventions intended to harmonise anti-corruption laws across jurisdictions. Mondi is aware of its corporate responsibility and supports the actions being taken to create sustainable corporate integrity.

Mondi does not tolerate any form of bribery or corruption. Mondi will neither give nor accept bribes nor permit others acting on its behalf to do so. Our corporate conduct is governed by our Code of Business Ethics (see page 19 for copy of Code).

This policy sets out Mondi's approach to unacceptable business practices, including bribery and corruption.

The Board has approved this policy in support of the Mondi Code of Business Ethics and has delegated responsibility for oversight of the policy to the Audit Committee.

In addition to compliance with this policy there is a duty to comply with the laws of the countries and jurisdictions in which our employees, customers, agents, consultants and suppliers operate.

If you have reason to suspect non-compliance with this policy, you have a duty to raise your concern. Please refer to the 'Reporting violations' section below.

Scope

All Mondi employees and any person who performs services and/or acts for and on behalf of Mondi, including contractors, consultants, agency staff and business partners ("Persons associated with Mondi") are required to adhere to this policy, irrespective of the jurisdiction they operate in and the laws applicable to such jurisdiction (where this policy represents a higher standard). Non-compliance may result in disciplinary action being taken which may lead to termination of employment, and/or to the termination of a third party contract (as the case may be).

This policy refers to all kinds of corrupt practices, including but not limited to:

1. Active bribery – the giving, promising or offering of a bribe;
2. Passive bribery – the requesting, agreeing to receive or accepting of a bribe;
3. The bribing of any public or Government official;
4. Illicit enrichment – misuse of company assets; and
5. Facilitation of tax evasion – deliberately and dishonestly taking action to facilitate tax evasion.

All Mondi Group companies and business units worldwide, including joint ventures where we have a controlling interest are required to apply this policy and its principles. Where we have a non-controlling interest we should encourage the application of this policy with our business partners.

In addition, this policy must be considered when entering into new business relationships, either through mergers, acquisitions, joint venture or new customers and suppliers. Such new relationships require careful assessment of the ethical conduct and reliability of any business partner.

This policy should be implemented in conjunction with the Mondi Code of Business Ethics and related policies.

Policy

The Mondi Code of Business Ethics states clearly the key principles and values that direct our conduct and support our policies, principles and guidelines. All operations and activities under Mondi's control, no matter where in the world, shall be conducted in an ethical manner.

Mondi is opposed to corruption and illegal practices in all their forms and shall not offer, pay or accept bribes (however defined) or commit any corrupt deeds in its dealings with governments, foreign public officials and in the commercial market place. Mondi does not engage in bribery or any form of unethical inducement or payment including facilitation payments and does not make political donations or incur political expenditure.

Mondi does not tolerate any such activity by Mondi personnel, contractors, consultants and agency staff and those with whom Mondi does business. All personnel are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Mondi Group.

All personnel are encouraged to raise any genuine concern about a suspected breach of this policy or any perceived infringement of their rights.

Key corruption risks:

1. Bribery
2. Facilitation payments
3. Interactions with Government officials and lobbying
4. Gifts and hospitality
5. Political donations
6. Charitable donations and sponsorship
7. Conflicts of interest
8. Misuse of company assets
9. Facilitation of tax evasion

Each of these key corruption risks is explained in more detail in the appendices to this policy.

Responsibility

The Group Chief Financial Officer is the main board director with primary responsibility for overseeing the implementation of this policy and for reporting annually to the Audit Committee and Board.

Each business unit will establish appropriate responsibilities and further procedures within their operations to ensure that this policy is fully implemented and that any instances of violation of the policy are reported in accordance with the requirements detailed below.

It is incumbent upon all levels of management to promote an ethical business culture, underpinned by a sound control environment, coupled with independent assurance processes (such as internal and external audit). Compliance with defined procedures (Mondi guidelines, segregation of duties and effectively carried out controls) is essential for managing the risks set out in this policy.

Should any instances of bribery or corruption be identified, remedial steps will be taken immediately.

Steps to be taken by the responsible line manager of the area in question include:

- Reporting of the possible case according to the reporting procedures shown below.
- Considering the country specific legal requirements for investigation activities – taking legal advice is recommended.
- Ensuring confidentiality to enable effective investigation and to protect Mondi's reputation.
- Safeguarding evidence and data to enable Mondi to take legal action in cases where management decide to do so.
- Identifying and remedying weaknesses in procedures and systems to prevent further losses.
- Taking all appropriate actions to recover lost assets and to secure evidence for a possible criminal conviction.
- Taking appropriate disciplinary action and a consistent zero tolerance approach.

Mergers, acquisitions, joint ventures and associates

Periodically Mondi explores opportunities to acquire companies and to enter into partnerships and joint ventures. As part of the commercial and financial due diligence process of such transactions the background, reputation, ethical and cultural values of any company we invest in or acquire, should be thoroughly investigated. We need to be sure what we may be inheriting.

Failure to conduct appropriate anti-corruption and compliance due diligence may create liabilities for Mondi where there has been previous, or there are ongoing, corrupt practices by the third party business.

Business interfaces

Given the risk inherent in existing business relationships, a thorough review of third parties who provide services on behalf of Mondi including contractors and other regular counterparties and possibly suppliers and customers, should be undertaken on a regular basis to assess their background, reputation, ethical and cultural values.

Training

Training will be provided on this policy and its implementation and will be tailored to the risks identified. In particular, it is anticipated that formal training of all employees involved in procurement, sales or other functions that require regular involvement with business counterparties, covering the contents, application and consequences of this policy, should be

undertaken as soon as practicable after the approval of this policy and at regular intervals thereafter.

Sanctions

Violations of this policy will not be tolerated. While violations will be reviewed on a case by case basis, should any instances of bribery, corruption or other misconduct under this policy be identified, appropriate steps will be taken immediately. This may include a review and revision of the business relationship, legal claims or disciplinary action in accordance with the Mondi Group disciplinary procedures. Such disciplinary action may lead to termination of employment.

Disciplinary action may also be instigated for instances of a failure to report a known violation of this policy.

Appropriate action will also be taken vis-a-vis counterparties involved in any breach of this policy, including with regard to contracts concluded with such parties. This may result in the termination of a third party contract.

Legal penalties

The maximum penalty for active bribery, passive bribery and bribing a foreign public official, under current legislation (e.g. under the UK Bribery Act), is 10 years imprisonment and/or an unlimited fine.

If a company is found to have given or received a bribe or to have bribed a foreign public official with the knowledge of a senior officer, that senior officer could face prosecution leading to a fine and/or imprisonment. A company may be subject to an unlimited fine.

If a company is found guilty of failing to take sufficient measures to prevent the facilitation of tax evasion, UK regulators can impose unlimited fines and other regulatory sanctions. This is in addition to any penalty that may apply to the individual involved.

Compliance

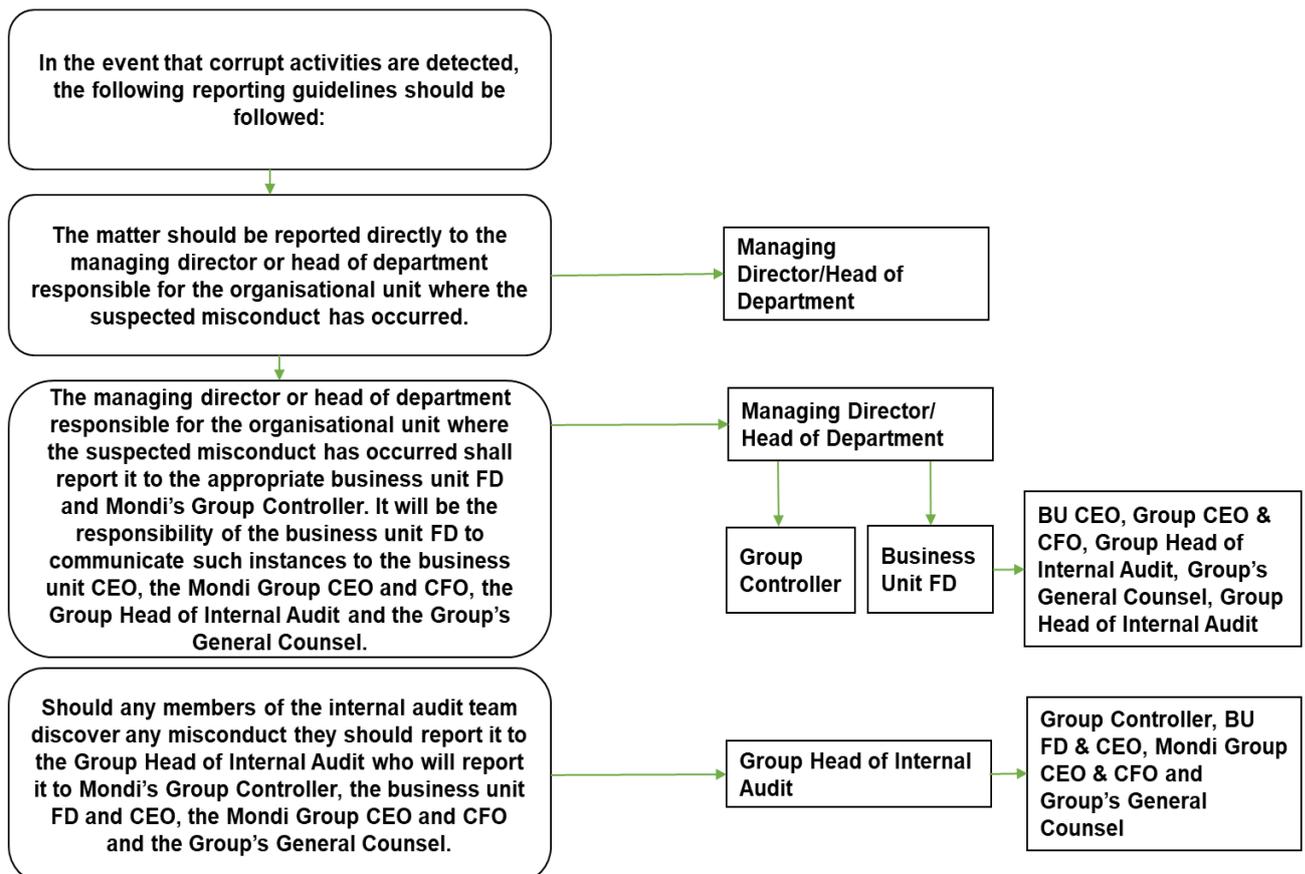
As part of the six monthly internal control confirmation procedure, employees shall be required to confirm their compliance with this policy.

Internal Audit shall include compliance with this policy within the scope of internal audits performed.

Reporting violations

All personnel are encouraged to raise any genuine concern about suspected misconduct or malpractice, including bribery, facilitation payments, extortion and money laundering, tax evasion, ethical misconduct or any perceived infringement of their rights. Known breaches of this policy must be reported.

When Suspected Misconduct Occurs



Alternatively, any employee may report any misconduct through the SpeakOut facility. Any suspected misconduct reported via SpeakOut will be notified by the service provider to the Group Head of Internal Audit who will then follow the procedure set out above.

SpeakOut is an alternative and confidential means for Mondì employees and external partners to raise concerns about any practice and conduct that is not in line with Mondì's corporate commitment to ethical business practice and conduct. SpeakOut is supported by a secure platform called SpeakUp®, managed by People Intouch and the overall process is coordinated by Internal Audit. The service is always available by dialling a free toll number, or visiting a web link. Please refer to PlanetMondi, or mondigroup.com for your local contact details.

A register will be maintained by the Mondì Internal Audit Department of instances of misconduct involving fraud or bribery, as well as any other violations of this policy. Details will be provided at Audit Committee meetings together with explanations of the actions taken to prevent any recurrence. For reporting purposes, a materiality level of €5,000 applies. Details of all SpeakOut reports received will also be provided to the Audit Committee and Board.

Mondi will not tolerate any form of retaliation against any person raising concerns in good faith. If a person reports concerns and seeks advice in good faith, they will always be supported by Mondi.

In all instances, consideration will be given to whether advice is required from external legal counsel.

Monitoring and review

This policy will be enforced through regular monitoring and review and will form part of the Group Internal Audit procedures.

Queries

Should you have any questions regarding this policy or the supporting principles please contact:

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10 March 2021

APPENDIX 1

BRIBERY

Policy

No employee or Persons associated with Mondi shall offer, provide, authorise, request, or receive bribes (as defined below) or anything which may be viewed as a bribe either directly or indirectly to or from any third party, whether or not such third party is a commercial party or a public official. No employee or Persons associated with Mondi may perform his or her functions improperly in anticipation or in consequence of any bribe.

What do we mean by bribery?

A bribe can include money, or any offer, promise or gift of something of value or advantage. It need not necessarily be of large value. It might include incentive programs, signing bonuses or overpaying government suppliers. It might also include intangible benefits such as the provision of information or advice or assistance in arranging a business transaction.

In summary, a bribe is any financial or other advantage which is offered, provided, authorised, requested or received as an inducement or reward for the improper performance of a person's relevant function or the receipt of which is itself improper.

For these purposes, a 'relevant function' can include any function of a public nature, any activity connected with a business, any activity performed in the course of a person's employment and any activity performed by or on behalf of a body of persons (e.g. a company). Any such function is performed 'improperly' by a person if they perform it in breach of what would be expected of them by a reasonable person by reference to any applicable requirements of good faith, impartiality or any position of trust which that person may hold.

What about public officials?

Specific rules apply to dealing with "public officials" (as defined in this Policy). It is important to note that public officials include any employees of government-owned or government-controlled entities. The risk of committing a bribery offence is particularly significant in any business that involves public officials or government-owned or government-controlled entities. A bribe in this context can also include offering or providing such officials any financial or other advantage in order to influence them for the purpose of obtaining an advantage. This can include influencing a public official to do something which is within the scope of their public duties or which they may otherwise have done in any event.

Each Mondi employee and Persons associated with Mondi is responsible for knowing and understanding the scope of this Policy and the scope of the applicable law in any relevant country of operation, including understanding whether any particular person with whom they are dealing is a "public official."

What is the definition of a public official?

Under this Policy, Public Officials include:

- any officer, employee or representative of, or any person otherwise acting in an official capacity for or on behalf of a Government Authority;
- any employee of a government-owned or government-controlled entity;
- a legislative, administrative or judicial official, regardless of whether elected or appointed;
- an officer of, or individual who holds a position in, a political party;
- a candidate for political office; or
- a person who otherwise exercises a public function for or on behalf of any country.

In practice, this can include civil servants, inspectors, members of a political party, employees of a state university, judges, customs and immigrations officials, ambassadors and embassy staffs, and law enforcement personnel.

Under this Policy, a Government Authority includes:

- national governments, political subdivisions or local jurisdictions;
- civil or military government agencies and their instrumentalities;
- government-owned or government-controlled associations, organisations or enterprises, including state-owned companies;
- legislative, administrative or judicial offices;
- political parties; or
- supra-national organisations (such as, for example, the World Bank, United Nations, International Monetary Fund, OECD).

Examples

- i. A Mondri employee offers to pay an amount of money to a representative of a potential customer in exchange for that representative awarding a tender to Mondri.
- ii. An agent offers an inducement to a foreign public official in order to secure government approval to award a permit.

APPENDIX 2

FACILITATION PAYMENTS

Policy

Mondi will not, and will not tolerate others acting on its behalf to, make facilitation payments to third parties not legally entitled thereto. Mondri will seek to eliminate the practice of facilitation payments in countries in which it does business.

What do we mean by facilitation payments?

Facilitation payments are (relatively small) unofficial payments made to secure or expedite the performance of a routine or necessary action, usually by public officials, to which the payer of the facilitation payment has legal or other entitlement. Such payments often occur by the recipient extorting the payment using the power of his or her official position and where the consequence of not paying may be out of all proportion to the small payment demanded.

If you are asked to make such a payment, you should try to establish the legality of the payment. For example, ask to speak to a supervisor or ask for evidence that the payment is lawfully required. If the payment cannot be verified or the official is not willing to provide a receipt, it should be assumed that the payment is not permitted. If you require advice as to whether to make the payment, please contact Mondri's General Counsel.

If refusing to make a facilitation payment results in some costs or delays being incurred, this is accepted as a normal consequence of this policy.

It does not include fees required to be paid by law.

Exception

While Mondri has a zero tolerance policy to bribery and corruption in all its forms, we do recognise that there may be exceptional emergencies where an employee is under threat of violence or personal harm. Put safety first, make the payment and report the circumstances and amount of the payment immediately in accordance with the reporting procedures set out on page 5. The details of any such payments made will be recorded.

Examples

- i. An immigration official demands €50 'entry fee' from an employee at an airport used frequently by company employees to be allowed entry to the country, even though the employee's passport and visa are all in order.
- ii. A customs official demands €150 to give priority clearance to goods arriving in port even though all import duties and paperwork are in order.

APPENDIX 3

INTERACTIONS WITH GOVERNMENT OFFICIALS AND LOBBYING

Policy

Mondi employees and Persons associated with Mondri will conduct all dealings with governments and public officials in a transparent and ethical way, promoting honest and constructive engagement. The risk of committing a bribery offence is particularly significant where you are involved in business involving public officials and this Policy sets stringent procedures in relation to your interaction with them. Please refer to Appendix 1.

What do we mean by interactions with Government officials and lobbying?

During Mondri's normal business activities there will routinely be interaction with government bodies and public officials. Some business outcomes will be dependent upon how we deal with the relevant government department, ministers or public officials. All such dealings must be carried out in a transparent and ethical way.

Examples

- i. A lobbyist requests payment up front to 'oil the wheels'.
- ii. A government official who is potentially able to influence business outcomes requests a donation to be made to a charity in which they have an interest.

APPENDIX 4

GIFTS AND HOSPITALITY

Policy

Mondi employees and Persons associated with Mondi will not offer, give or receive any gifts or hospitality which are intended, or may be construed, as a bribe, or which may place, or be perceived to place (directly or indirectly) the recipient under an obligation towards the party offering or giving such gift or hospitality.

Policy on giving gifts and business courtesies

1. Only modest gifts and entertainment that are business courtesies, reasonable and proportionate, designed to build relationships and goodwill in an appropriate way, should be offered. They should not obligate a recipient.
2. Conflicts of interest, or the appearance of conflicts of interest, should be avoided for a recipient.
3. You should not gain any commercial, contractual or regulatory advantage for the Group in a way which is unethical or inappropriate.
4. You should not, directly or indirectly, gain any personal advantage, pecuniary or otherwise.
5. Gifts of money or cash equivalents must never be given.
6. Gifts and entertainment to public officials should be avoided wherever possible.

Policy on receiving gifts and business courtesy

1. Reasonable and proportionate business-related modest gifts or entertainment that are business courtesies and conducted in the best interests of Mondi and foster business discussions and relationships may be accepted.
2. Such gifts or entertainment should not obligate you or influence your decisions to Mondi's detriment.
3. The recipient should not be offered any business or personal advantage over others as a result of receiving the gift or entertainment.
4. Gifts of money or cash equivalents must never be accepted.

What do we mean by gifts and hospitality?

'Gifts and hospitality' means anything of value e.g. tickets, transport, accommodation, meals, etc.

While the exchange of gifts and hospitality can build goodwill in business relationships, if done inappropriately it can create improper influence or a conflict of interest (or the appearance of improper influence or conflict). This policy aims to ensure that Mondi acts professionally and in a manner that will stand up to scrutiny consistent with its corporate responsibilities in the marketplace.

Mondi should be, and should be seen to be, free from bias in all its dealings and transactions with its suppliers, customers, potential customers and other relevant third parties.

Further Guidance

Mondi recognises that laws and market practices may vary across the jurisdictions in which it does business and what is considered acceptable may vary. This policy prohibits the giving or

receiving of gifts and hospitality that would result in a personal / business gain or advantage to the recipient, giver or anyone connected with them.

Always adopt a common sense approach and consider the intent, materiality, frequency, legality, transparency and also the rules of the other party when giving or receiving gifts or entertainment. Also consider the timing of any business courtesy. If given or received around the time of a contract negotiation then there is more likelihood of a negative interpretation.

Any gift or hospitality given or received of €250 or above (or the local currency equivalent) must be approved by the individual's line manager and be recorded in a register via the Group-wide online system for this purpose. Lower limits may apply in certain instances and the thresholds in the Implementation Policy must be followed. Notwithstanding this, the general principle is that, no matter what the sum involved, any gift or hospitality given or received must not deflect you from performing your responsibilities to Mondi in a correct and ethical manner.

Gifts and entertainment that are sufficiently modest may be deemed acceptable e.g. modest occasional meals with people with whom Mondi does business; occasional attendance at sporting and cultural events or the theatre; and gifts where the value is nominal or they are small promotional items.

Hospitality that is frequent, disproportionately long or lavish should not be accepted or offered.

If you are in any doubt regarding the acceptance of gifts or hospitality they should be returned or declined with a note advising that acceptance would be contrary to Mondi's policy. Alternatively, if matters are not clear or you consider that it may give rise to a business problem then please refer the matter to your line manager.

Examples

- i. Accepting an invitation from a customer on an 'all expenses paid' basis to a sporting event in a distant location that would, for instance, require transport and/or accommodation, would not be acceptable.
- ii. A programme of annual events including attendance at various sporting events as an expression of appreciation for long established business partners where those business partners pay for their own travel and accommodation, would be acceptable.

APPENDIX 5

POLITICAL DONATIONS

Policy

Mondi employees and Persons Associated with Mondi will not make any political donations, contributions or incur any political expenditure on Mondi's behalf, in any form, whether to political parties, causes or to support individual candidates, anywhere in the world.

What do we mean by political donations?

Direct or indirect contributions to political parties, other political organisations or individuals engaged in politics, as a way of obtaining advantage in business transactions.

A political contribution, financial or in kind, to support a political cause.

One area where great care will need to be exercised is where the Group acquires a new subsidiary company. Careful due diligence will need to be carried out to establish whether any political donations have been made or political expenditure incurred prior to acquisition.

Exception

The making of political donations is a matter that is reserved for the Board.

We recognise the rights of individuals to participate in the political process, acting in a personal capacity.

Employees must not, however, use Mondi time, property or equipment to carry out or support those personal political activities.

Subscriptions to, and activities for, trade and industry associations and donations to trade unions are not deemed 'political donations' for the purposes of this policy.

Example

- i. Making a financial donation to a political party participating in an election is not permitted.

APPENDIX 6

CHARITABLE DONATIONS AND SPONSORSHIP

Policy

We will support, sponsor and contribute to social and community activities that are aligned with Mondi's business objectives and values. Such donations and social investment will not be made so as to create the perception of impropriety, in particular with dealings with government officials, politicians and others of influence.

What do we mean by charitable donations and sponsorship?

Through Mondi's Corporate Social Investment (CSI) framework each business unit is able to decide which community-related projects to support. Through this generic framework we fund causes through discretionary volunteering, donations and sponsorship. This devolved approach ensures that we invest in a wide variety of programmes, relevant to the needs of employees and the communities in which they live and work. It is important that in all cases we act transparently, ethically and in good faith.

Cash donations paid to individuals should be avoided.

Care needs to be taken in situations where, for example, in connection with a tender, collateral investment in the local community is requested by a public official. Legal advice should always be sought in such situations.

Please also refer to the corporate social responsibility policies.

APPENDIX 7

CONFLICTS OF INTEREST

Policy

Mondi employees and Persons associated with Mondri will avoid actual or perceived conflicts of interest, whether involving themselves or close relatives (spouse, civil partner, adult children or other close relatives), and will discuss any issues that may potentially conflict with the interests of Mondri with their line manager.

What do we mean by conflicts of interest?

Conflicts of interest occur when we find ourselves in a situation where two or more competing interests conflict and impair our ability to make objective, unbiased business decisions. A conflict of interest can take many forms:

- private and company interests are mixed;
- allowing private interests to influence business decisions; and
- financial or personal considerations may influence judgement when carrying out employment duties and responsibilities.

Potential conflicts of interest must be avoided or carefully managed. All conflicts or potential conflicts must be disclosed as soon as you become aware of it. It is important that such issues are dealt with promptly and in a transparent manner. You should inform your superior in the case of a potential conflict of interest and obtain his/her prior approval in writing before taking any action or business decision that could be affected by such a conflict of interest.

Examples

- i. An employee having a second job in a third party organisation which is a customer, competitor or potential business partner of Mondri.
- ii. Recruiting a close family member or close friend or such persons performing services for Mondri customers, suppliers or business partners.
- iii. Serving on the board of directors of certain organisations external to Mondri.

APPENDIX 8

MISUSE OF COMPANY ASSETS

Policy

Mondi employees and Persons associated with Mondi will protect all Mondi equipment, property and information from loss, disclosure or misuse and they will not be provided for the personal or discretionary use of customers, public officials and in dealings with the private sector.

What do we mean by use of company assets?

Corruption is not confined to the payment of cash bribes or the provision of gifts, hospitality and business courtesies. Making Mondi assets available to public officials or customers for their personal use, e.g. premises, equipment or vehicles, is likely to represent something of value for the intended recipient. Where such use is by those who may be in a position to influence Mondi's commercial dealings it can be perceived as being with the intention of obtaining an improper advantage in the conduct of that business.

Employees have a responsibility to protect Mondi assets against theft, loss, abuse, unauthorised access and disposal.

Employees may only use Mondi assets for the purpose of discharging their Mondi job responsibilities or where Mondi policy or statutory rights permit.

Information about Mondi and its operations, including intellectual property, also represent valuable assets that must be protected. While Mondi has a separate policy in place relating specifically to the maintenance of confidentiality of inside information, this Business Integrity Policy applies generally to the requirement for all employees to maintain confidentiality of key Group information. The unauthorised sharing or passing on of confidential information amounts to the misuse of company assets and will be treated accordingly.

Example

- i. A Mondi employee discloses a Mondi product price list to a competitor in exchange for the competitor granting employment to a family member of the Mondi employee.

APPENDIX 9

FACILITATION OF TAX EVASION

Policy

Mondi does not tolerate any form of tax evasion. Any concern of suspected violation must be reported immediately. Every Mondri person has a duty to report a genuine concern. In addition to reporting suspected violations in accordance with the procedure set out on page 5, you should also report such instances to Mondri's Group Head of Tax. Mondri will not tolerate any form of retaliation against persons raising concerns in good faith. If a person reports concerns or seeks advice in good faith, they will always be supported by Mondri.

What do we mean by facilitation of tax evasion

On 30 September 2017, the corporate criminal offence ('CCO') of the failure to prevent the facilitation of tax evasion took effect in the UK. Tax evasion is already a criminal offence in the UK and most other countries, but this offence makes it easier for the UK regulators to attribute criminal liability to corporations rather than individuals. The fines for a corporation found guilty of this offence are unlimited and additional regulatory sanctions can be severe.

The offence would be relevant to Mondri in circumstances where:

1. There is criminal **UK or non-UK** tax evasion by an individual or company under an existing UK or non-UK law;
2. There is deliberate and dishonest facilitation of the evasion by a Mondri employee or Persons associated with Mondri; and
3. Mondri failed to prevent the Mondri employee or Persons associated with Mondri from committing the facilitation.

For these purposes tax evasion requires the Mondri employee or Persons associated with Mondri to commit a criminal fraud by deliberately and dishonestly taking action to facilitate tax evasion. Individuals acting on behalf of Mondri who act accidentally, mistakenly or negligently are **not** within the scope of this offence.

The law is wide reaching particularly because:

- (i) it could be applied to tax evasion in any country; and
- (ii) it could relate to a Mondri employee or Persons associated with Mondri facilitating tax evasion of other parties such as suppliers, customers, partners, advisors, shareholders, parties involved in M&A transactions, etc, providing there is intention on the part of the Mondri employee or the Persons associated with Mondri.

For overseas (non-UK) tax evasion, some UK nexus is required to commit an offence, such as malpractice by an individual whilst physically working in or visiting the UK.

Indicators associated with tax evasion risk

The following areas are examples of high risk indicators but the list is not exhaustive. Even where an indicator is relevant, the offence is only committed where there is assistance from a Mondri employee or Persons associated with Mondri who acts deliberately and dishonestly to facilitate tax evasion.

1. Request for cash payment to an associated person.
2. Request to make a payment to a bank account in a territory associated with secrecy and/or tax haven status.
3. Request to carry out a transaction without a clear commercial purpose.
4. Request to structure or re-characterise a transaction or a contract without a clear commercial purpose.
5. Sole access rights to important information/documents/systems (e.g. only one user possesses log-in details for an accounts payable system).
6. The opportunity for an individual to process transactions/payments without any review or approval processes in place.
7. Pressure or incentive not to discuss or report a genuine concern.

Code of Business Ethics

This Code applies to Mondri plc and its subsidiary companies (together "Mondri"). The Code sets out the five fundamental ethical principles that govern the way in which Mondri and its employees will conduct business.

The Five Mondri Principles

Legal Compliance

Mondri will comply with all applicable laws and regulations.

Honesty and Integrity

Mondri will observe the highest standards of honesty and integrity.

Human Rights

Mondri will respect the Universal Declaration of Human Rights.

Stakeholders

Mondri will have due regard to the interests of all its stakeholders including shareholders, employees, customers, business partners and communities.

Sustainability

Mondri will conduct its business sustainably, ensuring safety, health and the protection of the environment.

All persons performing services and/or acting on Mondri's behalf and joint ventures where Mondri has a controlling interest are required to observe the same principles.

The detailed application of these principles is documented in Mondri's policies and procedures, in particular the Mondri Sustainable Development Policy.