



SPAAS<sup>®</sup>

light up your life

# SUSTAINABILITY REPORT

2023

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# ABOUT THIS REPORT

**SPAAS**<sup>®</sup>  
light up your life


**Our mission statement perfectly sums up our ambition: ‘Light up your life’.** We aim to do this by being fully committed to sustainable and responsible business practices. In our sustainability report, in accordance with the GRI (Global Reporting Initiative) framework, we show our environmental, social and governance (ESG) performance, our passion for innovation and our goals and commitments for the future in the context of a sustainable transition.

## SCOPE, REPORTING PERIOD, OWNERSHIP & LEGAL FORM


This report follows our fiscal year, namely from July 1 to June 30. The report covers Spaas’ headquarters in Hamont and its production site in Stargard, Poland. Spaas is a family owned, limited company.


The sustainability report is accessible online at [www.spaas.be](http://www.spaas.be). This is our first ESG report, the report was drafted by sustainability manager Elise Maris, has been proofread/ co-authored by relevant department managers and has been approved by the managing board. The future reporting will be an integrated report in line with the CSRD.

 Candle manufacturer since 1853

 100% Belgian

 5<sup>th</sup> generation family business

 > 350 employees

 HQ + Production Hamont (B)  
Production Stargard (Pl)

 > 105M €  
(14% Belgium – 86% Export)

 Active in 40 countries in Europe

 2.065 customers:

- Retail food & non-food
- Wholesale catering
- Garden centers & do-it-yourself
- Distributors
- E-commerce
- Church

## FRAMEWORKS APPLIED, ESG RATINGS & PARTNERSHIPS



### CONTACT DETAILS:

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## CHAPTER 1

# THIS IS SPAAS

### IN THIS SECTION

About us	4
Company Governance	5-7
Conversation with our CEO	8-9
Material Topics	12-13
Sustainability As Strategic Anchor	14



THIS IS SPAAS

## ABOUT US

In 1853, Spaas Candles started in the picturesque town of Hamont, Limburg. As pioneers in the wax bleaching industry, they produced semi-finished products for church sextons. With the second generation, the hand-rolled church candle came into existence.

Generation after generation brought innovation. The third generation flourished the business, conquering the secular market with functional emergency candles. Over the past 170 years, steady growth and automation have paved the way.

Today, Ben and Sarah Spaas are the proud shareholders. Spaas Candles has grown into a prominent player in the European candle market, with more than 350 dedicated employees. Their influence extends across Europe, and even the young sixth generation is inspired by their traditions and heritage.

For Spaas, family is an integral part of their DNA. They aim to “inspire people to add a touch of warmth to everyday life”, a principle that is reflected in their daily operations.

## COMPANY GOVERNANCE

*Spaas has earned an reputation both in Belgium and worldwide for its excellent governance structure, sustainable entrepreneurship and clear leadership through a family business of 170 years and five generations, and was therefore awarded the Family Business Award of Excellence 2022.*

Spaas has established a governance structure that incorporates both corporate and family governance, outlined in a “family charter”.

Corporate management involves a Board of Directors, Managing Board, and Middle Management. **The Board of Directors** consists of seven people: three family managers, three independent experts and the CFO with as primary objective to challenge strategic decisions. **The Managing Board** consists of five directors with complementary backgrounds and knowledge in their relevant areas, ensuring a well-rounded understanding of the company’s operations and challenges. The responsibilities of the Managing Board are mainly leadership, strategy development and supervision of various corporate aspects such as digitalization, business lines, sales, etc.

The Middle Management comprises the 12 department heads and serves as a forum for collaboration and decision-making. While the CEO retains ultimate responsibility, the **Middle Management** is responsible for developing and implementing strategies and objectives to achieve sustainable and profitable growth in their respective areas.



# COMPANY GOVERNANCE

**Production Oversight:** The production manager and shift leaders manage blue-collar workers. These workers are divided into generalists and specialists, each contributing unique skills to the production processes.

**The family charter** serves as a guiding document for the family's involvement in the business. It outlines the principles, values, and expectations that govern their participation. By adhering to this charter, we ensure a harmonious integration of family interests and business operations, fostering long-term stability and growth.

Furthermore, we formally hold a Family Forum once a year. The Family Forum primarily fulfills a role as a communication body that stimulates and channels interaction among family members and between the family and the company. It is a place of free and open expression. It cannot decide on matters where Board of Directors and management have jurisdiction. Nor can it criticize or judge the decisions of managers and Board of Directors. The forum is open to all family members (including in-laws and children > 18 years of age).

“

**BOTH THE MANAGING BOARD AND MIDDLE MANAGEMENT APPROVE SUSTAINABILITY FOCUS AREAS, TARGETS, AND OBJECTIVES**

”

## ZOOM IN ON SUSTAINABILITY INCORPORATION

**Sustainability Manager:** In 2022, Spaas Candles underwent significant changes in its sustainability approach. Previously, an internal project group was responsible for identifying and pursuing sustainability expectations. Today, a sustainability manager oversees all sustainability-related efforts and regularly reports progress to the CEO.

**Internal alignment:** The sustainability strategy and objectives are validated by both the Board of Directors and the Middle Management, with the ultimate responsibility resting with the former. Sustainability Key Performance Indicators (KPIs) are routinely evaluated, and discussions about sustainability progress, regulations, practices, and achievements are frequent agenda items in meetings held by both governing bodies. All business departments share responsibility for implementing sustainability and aligning their activities with the overall strategy. The success of sustainability depends heavily on the involvement of our people, their commitment and the creation of awareness. Collective knowledge on sustainability topics is created through internal training on topics such as sustainable procurement, principles of design for recycling, new regulations, etc. Board members and division managers are encouraged to attend specific trainings on relevant ESG topics.

**Project-driven:** Sustainability goals are addressed by multi-departmental project groups to ensure effective progress.

**Progress Monitoring:** To track progress on sustainability, the company sets key performance indicators (KPIs) and reviews them each semester. Thus, the company can track performance, identify areas for improvement and take necessary actions.

Our main challenges and **opportunities** related to managing sustainability are increasing pressure from local and EU standards and regulations at both product and company level. As well as increasing pressure and expectations from customers.

# COMPANY GOVERNANCE

Children under 18 may also attend but have no voting rights. The 6th generation are currently between 18 & 23 and still studying. They are gradually involved in the Family Forum initiatives as well as encouraged to perform vacation work in the family business and/or attend external meetings e.g. Tomorrow's Legacy by EY.

The combination of family governance and the corporate governance structure described above creates a robust framework for decision-making, accountability, and overall company management. It promotes transparency, professionalism, and a healthy exchange of ideas, ultimately contributing to the success and sustainability of Spaas.

## INTERNATIONAL GOVERNANCE

All the policies, business practices and values are applicable in all our branches and are communicated to all employees in the onboarding process.

## POLICIES AND GUIDELINES

The Spaas Code of Conduct guides our ethical business practices and internal social impact. It is rooted in global standards such as the ILO Declaration and OECD Guidelines. All employees are expected to follow this code, setting our shared behavior standard.

In addition to the Spaas Code of Conduct, we have implemented various policies and guidelines that support our day-to-day business practices. These policies are designed to ensure regulatory compliance and promote responsible conduct. General overview with references to where they are elaborated;

Spaas Palm Oil Statement	p. 49
Spaas ETI base code	p. 35
SPAAS statement on candle health hazards	p. 46
Supplier code of conduct	p. 49
Spaas wind/floods climate risk & vulnerability assessment	p. 52

## TRANSPARENCY

With this sustainability report, we are committed to transparency. By sharing information, we want to foster relationships with and meet expectations of our consumers and stakeholders, recognizing sustainability as a worldwide and multidisciplinary challenge.

‘De Fakkkel’ is given each year to a Limburg family business that manages its future well and follows good ‘governance.’ Spaas Kaarsen won in 2020. The jury said: *“For five generations, the Spaas family has managed to ensure continuity. The organization and structure ensure that family governance is highly valued.”*



## CONVERSATION WITH OUR CEO

*The world has changed incredibly fast over the past two decades. The context in which we operate as a company today has become much more complex. There are many social challenges: climate, energy, labor market, migration, digitization and, finally, social cohesion.*

Polarization in society and politics is increasing, giving populism and extremism a chance to flourish. The danger of this polarizing dynamic has been experienced several times recently. Much of this social phenomenon has been going on for some time, but has been magnified by the Corona crisis. The changes around us are occurring faster and faster and are more unpredictable in nature.

In such a challenging context, it is important to find the right balance. On the one hand, we need to be resilient enough to deal with the consequences of often large and unforeseen changes. On the other hand, we need to be fast and agile to take advantage of opportunities that arise due to changes in the market and society. Finding this balance is not an easy task. Over the past two and a half years, we have all experienced what the accumulation of a health crisis, resource shortages and war can do to our daily lives.

But it has not changed our vision that we should embrace this "changing world". Sustainability has become one of the company's strategic anchors. We are committed to clear governance structures to guide our actions and ambitions and a successful integration of sustainability on our core business. Therefore we have created a sustainability roadmap that includes short-, medium- and long-term goals. The leadership team together with the support of our Sustainability Manager is empowered to take the necessary steps within this roadmap and monitor the progress. We are actively involved in a constant process of improvements to make our products and production process more sustainable. We follow trends, adapt new guidelines, implement customer requirements and discuss further pending issues with our customers and suppliers.

“  
**SUSTAINABILITY HAS BECOME  
ONE OF THE COMPANY'S  
STRATEGIC ANCHORS**  
”





## CONVERSATION WITH OUR CEO

Furthermore we challenge ourselves to provide a fair, healthy and inclusive workplace supported by a culture that promotes open communication. The biggest motivation for people is to feel connected with their colleagues; to have the possibility to learn and grow; and in the end to be involved in the business. It is the joint responsibility of the leadership team and HR to create an environment in which this becomes possible.

We strongly believe that growth that takes account of our environmental impacts on the one hand and the well-being of our employees on the other hand is the only way to deliver sustainable returns.

Since 2020 we have our ESG policy audited annually by Ecovadis, an independent rating platform, in order to monitor our progress. Right now we are achieving a silver medal. We are determined to move up to gold within the next 2 years. In this way we also put our words into action because growth and sustainability can only go hand-in-hand.

Ben Spaas - CEO



THIS IS SPAAS

# OUR COMPANY STRATEGY

## OUR DREAM

Since 1853, Spaas has represented true and authentic connection. And today, more than ever, we believe that **every flame has the power to connect.**

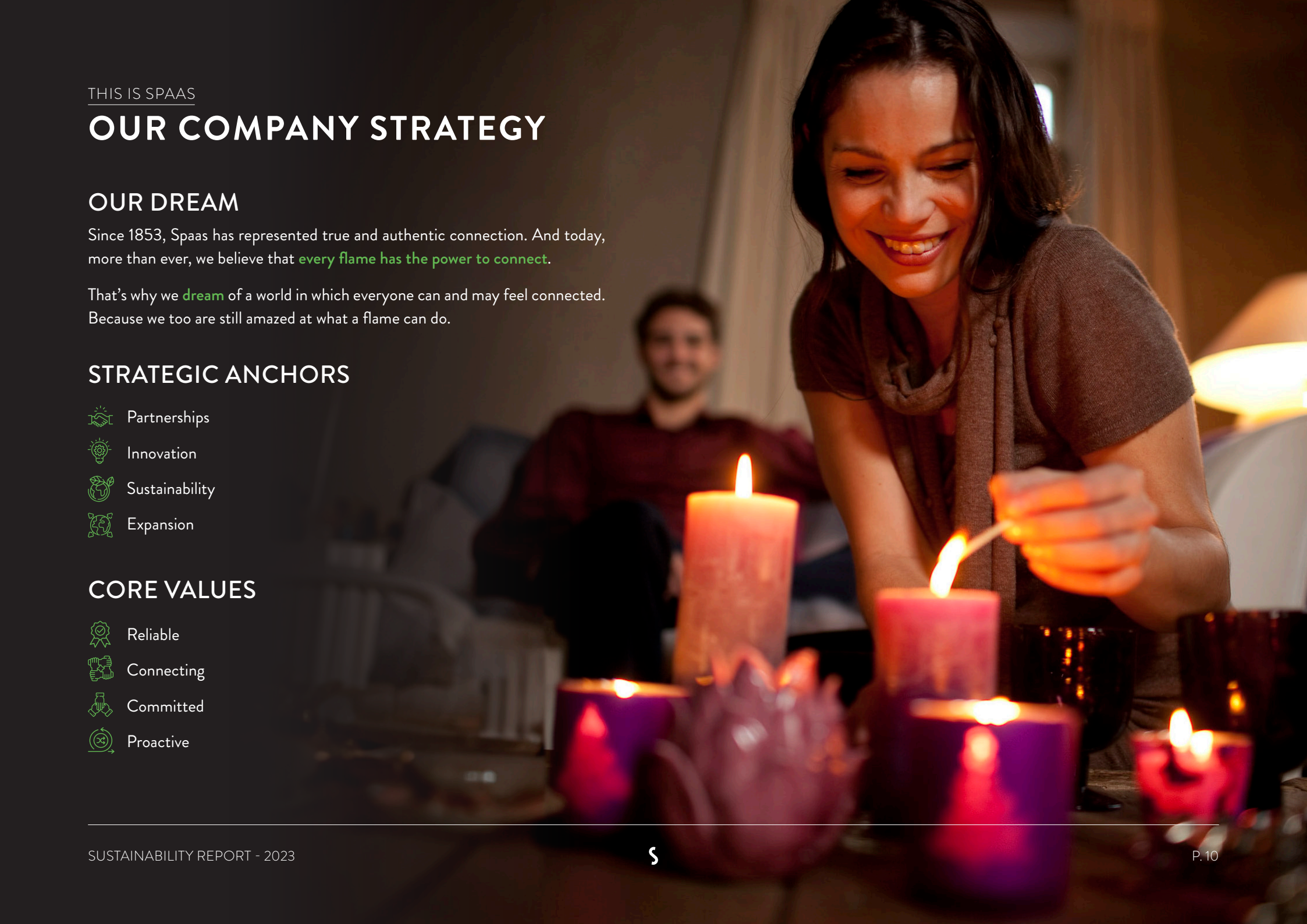
That's why we **dream** of a world in which everyone can and may feel connected. Because we too are still amazed at what a flame can do.

## STRATEGIC ANCHORS

-  Partnerships
-  Innovation
-  Sustainability
-  Expansion

## CORE VALUES

-  Reliable
-  Connecting
-  Committed
-  Proactive



# VALUE CHAIN & STAKEHOLDERS

## SUPPLIERS

We highly value our supplier relationships. Our collaboration is essential for a sustainable and high-quality ingredient supply for our products. We invest in research and actively engage with our strategic suppliers to ensure responsible sourcing, supporting their resilience and responsible practices, including safe workplaces, fair treatment, and environmental responsibility. This involves direct project-based communication, site visits, sustainability and quality assessments, as well as ad hoc calls.

## BUSINESS PARTNERS, FINANCIAL MARKETS

We collaborate closely with our partners to ensure the responsible and safe delivery of products. This includes addressing topics such as process safety, spill prevention, climate mitigation (GHG emissions), and employee wellbeing. We maintain open communication through direct contacts, quarterly meetings, phone calls, emails, and regular audits.

## CONSUMERS, YOUTH

Perhaps the most important step of all is for consumers to enjoy our candles. We are always looking for new ways to bring light into everyday's life. In our developments of wax blends, we focus on the creation of the perfect balanced candle with a full, clean and safe burn. We want to connect with our consumers by offering meaningful brand experience in a responsible way and by providing them with the knowledge to make responsible choices.



## MANUFACTURER (SPAAS)

Operating in two countries, we tap into more than 170 years of knowledge, expertise and innovation to make products that excite consumers. We strive to optimize our operations to promote sustainable use of resources. We also prioritize employee development and awareness in areas including occupational health and safety, sustainability and other relevant areas through daily work interactions, special training sessions, engagement surveys, email communications and more.

## CUSTOMERS

We collaborate with retailers, horeca establishments, and wholesalers to responsibly introduce our candles to consumers, while supporting our customers' business growth. Our customers are increasingly prioritizing sustainability, particularly concerning climate mitigation (reducing carbon footprint) and the sourcing of product raw materials and packaging. We actively engage with them through direct communication, site visits, phone calls, emails, and more.

## COMMUNITIES, NGO'S

Spaas promotes active involvement with local communities while mitigating the influence of our operations throughout the entire value chain. This includes conducting air quality assessments, managing water consumption, ensuring process safety, implementing sustainable projects through Corporate Social Responsibility (CSR) initiatives.

## MATERIAL TOPICS

*SPAAS focuses on topics for which the company has the most significant impact (positive or negative) on the economy, environment, and people, making them the main focus of the report.*

The material topics for SPAAS were identified through three steps; First, key topics were identified based on a comprehensive review of existing company reports, activities and ESG performance, as well as an industry benchmark. Furthermore, standards and regulations and ESG frameworks were considered, including the UN Sustainable Development Goals (SDGs), Global Reporting Initiative (GRI), United Nations Guiding Principles and Ecovadis reports.

The sustainability expectations of customers were also taken into account. The longlist of topics was then divided into thematic areas such as climate change, labor practices, diversity and inclusion, etc., creating a concise and diverse overview of themes.

The second step identified the potential impact (positive or negative) of each defined theme through internal interviews of departmental managers.







Finally, the materiality findings were validated through internal discussions with the managing board and middle management, the CEO and by comparing them to the Sustainability Accounting Standards Board (SASB) ESG sector standards. The result is a list of material topics that guides priority areas for the future. The materiality assessment was used to define our sustainability strategy, goals and objectives which you can find on page 10.

In the coming two years, SPAAS plans to update the assessment, refining the importance of impacts and seeking direct input from external stakeholders, as we move towards a double materiality approach.

List of material topics on the following page.



# MATERIAL TOPICS

MATERIAL TOPIC	EQUIVALENT GRI TOPIC	SDG MAPPING
Tackle Climate Change	GRI 201-2: Financial implications and other risks and opportunities due to climate change GRI 302: Energy GRI 305: Emissions	
Sustainable Packaging		
Renewable ingredients	GRI 301: Materials	
Waste management	GRI 306: Waste	
Biodiversity	GRI 304: Biodiversity	
Water	GRI 303: Water	
Diversity, inclusion	GRI 102-8: Information on employees and other workers GRI 405: Diversity and equal opportunity GRI 406: Non-discrimination GRI 102-41: Collective bargaining agreements GRI 402: Labour/ management relations GRI 407: Freedom of association and collective bargaining GRI 408: Child labour GRI 409: Forced or compulsory labour GRI 4012: Human rights assessment	
Lifelong learning	GRI 404: Training and education	
Health & safety	GRI 416 : Customer health and safety	
Social impact	GRI 102-11: Precautionary principle or approach GRI 102-16: Values, principles, standards and norms of behaviours GRI 102-17: Mechanisms for advice and concerns about ethics GRI 102-18: Governance structure GRI 205: Anti-Corruption	
Responsible sourcing	GRI 102-9: Supply chain GRI 204: Procurement practices GRI 308: Supplier environmental assessment GRI 414: Supplier social assessment GRI 414: Supplier social assessment	

THIS IS SPAAS

# SUSTAINABILITY AS A STRATEGIC ANCHOR

*For Spaas, sustainability is a strategic anchor of our business strategy. We believe in a sustainable transition and strive for sustainable innovation.*

At Spaas, we look at sustainability from 3 dimensions: Environment, Society and Governance (ESG). Ecological quality cannot be separated from social equity, justice and integrity.

Our sustainability mission consists of 5 pillars and 11 goals with specific, measurable ambitions to track our progress over time. All of our goals have as their base the fiscal year 2022 (1/07/2021-30/06/2022). Targets were identified by projecting planned actions onto current metrics and analyzing international frameworks and regulations. Our Ecovadis certificate validates that we pursue these goals every day.

# OUR AMBITIONS

		Target				Actions
ESG TARGET SUSTAINABILITY STRATEGY 2023-2050		2022	2025	2030	2050	
TACKLE CLIMATE CHANGE	<b>TACKLE CLIMATE CHANGE</b>					
	% reduction CO2 -eq/tonne Scope 1 & 2	-	-15%	-30%	carbon neutral	> Ongoing market research into climate-neutral energy sources > Transition to an electric vehicle fleet
	% reduction CO2 -eq/tonne Scope 3	-	-5%	-20%	carbon neutral	> Assessing all impact categories for a holistic approach such as packaging and resource optimization, waste minimization and recycling, logistics and transportation, business travel and employee commuting.
SUSTAINABLE PRODUCT DESIGN	<b>COMMIT TO SUSTAINABLE PACKAGING</b>					
	% recyclable* product packaging	>75%	>85%	100%	100%	> Implementing innovations through an internal working group on sustainable packaging
	% reduction in virgin product plastic usage	2040 tonne	-35%	-75%	-90%	> Redesigning packaging for optimal recyclability > Enhancing the collection of packaging-specific data for improved analysis
	% sustainable certified FSC paper and cardboard	60%	100%	100%	100%	
SUSTAINABLE PRODUCT DESIGN	<b>INCREASE THE USE OF RENEWABLE INGREDIENTS</b>					
	% of raw materials that are renewable	36%	40%	70%	100%	> Maximizing the utilization of renewable raw materials in our partial blends > Conducting market research on non-fossil raw materials with minimal environmental footprint > Empowering customers with sustainable options through LCA analysis-based recommendations
WASTE MANAGEMENT	<b>MINIMALISE OPERATIONAL WASTE</b>					
	operational waste (tonne)	905	-5%	-15%	-35%	> Applying circular principles in our product design, sourcing, manufacturing and packaging > Forging partnerships for repurposing our waste streams
	% of production waste recycled	60%	>60%	>70%	-	> Phasing out single-use office consumables > Reviewing secondary packaging
PRESERVE NATURE	<b>PROMOTE BIODIVERSITY</b>					
	We are fully committed to our goal of responsible sourcing, and keep nudging our private label customers to switch to MB					
	<b>ADDRESS CRITICAL WATER CHALLENGES</b>					
	Tap water consumption	8190m3	-	-25%	-	>Enhancing rainwater utilization for sanitary purposes

# OUR AMBITIONS

		Target				Actions
ESG TARGET SUSTAINABILITY STRATEGY 2023-2050		2022	2025	2030	2050	
PROMOTING A FAIR, HEALTHY AND INCLUSIVE WORKPLACE	<b>PROVIDING A DIVERSE AND INCLUSIVE WORKPLACE</b>					
	% women in senior management	50%	± 50%	± 50%	± 50%	> Implementing a whistleblower procedure to address workplace discrimination > Promoting and actively demonstrating respect for all religions and customs
	% women in own workforce	73%	± 50%	± 50%	± 50%	
	<b>PROVIDING ACCESS TO LIFELONG LEARNING</b>					
	Average training hours / employee / year	21	+ 20%	+ 30%	+ 30%	> Implement a comprehensive education program > Ensuring consistent registration of provided trainings
	<b>ENSURING A SAFE AND HEALTHY WORK ENVIRONMENT</b>					
	% annual absenteeism	4,7%	-20%	-35%	-	> Conducting periodic risk assessments and controls at both sites > Continuing comprehensive health and safety trainings for all employees > Investing in our plant, storage rooms and equipments
	Injury Frequency rate	75	-20%	-70%	-	
	Turnover	11%	-5%	-5%	-5%	
	<b>MAKING A SOCIAL IMPACT</b>					
Euros invested in philanthropic projects	25.000	70.000				
GOVERNANCE	<b>RESPONSIBLE PROCUREMENT</b>					
	% of strategic suppliers that signed our code of conduct	24%	50%	75%	95%	> Increasing supplier engagement and collaboration in our sustainability transition > Encouraging suppliers to reduce their environmental impact and take social responsibility > Sourcing from local suppliers whenever possible > Including product life cycle analyses in procurement decisions
	% of strategic suppliers with an Ecovadis score	-	75%	100%	100%	
	% of strategic suppliers covered with on-site audits every 2 years	2%	10%	50%	-	
	% of buyers trained in sustainability purchasing per year	-	100%	100%	100%	
% of palm that is RSPO mass balanced	44%	50%	100%	100%		



## CONVERSATION WITH OUR CFO

*In many companies, there are a lot of preconceptions about sustainability. For instance, sustainability would mainly require a lot of financial resources, putting companies' profitability at risk. In the short term, this may be true, but this view seems to become obsolete very soon. More than ever, companies face the task of making sustainability a top priority for the sake of their future profitability. And that is precisely where the challenge lies for our organization and certainly also for the finance function: facilitating the transition from currently well-run to more sustainable processes. Whether we want it or not, choosing between investing now versus waiting to see if something can perhaps be done later is not our ambition. Innovating and pro-actively responding to future sustainability trends is what we want to go for.*

### ANTICIPATING BY MEASURING

Monitoring our sustainability goals is obviously also an important new role for the finance function within an organization. Besides the classic financial reports, the non-financials are gaining importance as the backbone for measuring whether or not a sustainability policy is successful. Together with the sustainability manager, this topic is high on the agenda.

### THE G OF ESG LEADERSHIP IN SUSTAINABILITY

CO2 reduction, energy transition, inclusiveness ... few of the many 'hot topics' in making our company more sustainable. We are convinced that all of these are only possible if there is sustainability leadership. From financial profiteering to a sustainable way of doing business. Short-term less sustainable quick wins versus taking into account other values to improve the future profitability and image of our company is our challenge. Obviously, moving an entire organization in this direction requires leadership and conviction. The bottom line in a financial report is one thing, embedding and measuring our sustainability values is another that will increasingly come into play with this.

*Gert Hazevoets, CFO*

“  
**MORE THAN EVER, COMPANIES  
FACE THE TASK OF MAKING  
SUSTAINABILITY A TOP PRIORITY  
FOR THE SAKE OF THEIR FUTURE  
PROFITABILITY.**  
”



## ECONOMIC PERFORMANCE

*Economic performance refers to our aim as a company to grow, to be profitable in the long-term and for Spaas, this also means being a responsible and sustainable company. As securing economic growth goes hand in hand with positively impacting the environment and society as well as meeting expectations of all stakeholders involved.*

The world is changing faster and faster and finance must play a key role in the company to steer it through those uncertain times. About every major global event that occurred in the last five years could have had a big impact on our financial results without changing, adapting and finding new solutions to mitigate the potential risks;

Brexit had a significant impact on the company. The risks were situated on three levels: the evolution of the EUR/GBP exchange rate, new regulations and legislations and finally the possible transportation problems at the EU border.

COVID-19, unexpectedly, brought opportunity. With people seeking comfort at home, candle demand increased. We hardly stopped wearing mouth masks,

before the next crisis announced itself: Russia and Ukraine were at war. This had an enormous impact on the prices of our raw materials like paraffin, stearin and palm wax.

An additional challenge for our finance department is the seasonal character of our business. 75% of our turnover is realized between September and March. We don't have production capacity to serve all the clients in that period, so we need to make stocks in the low season in order to deliver later in the year. By consequence we have a high stock in the lowest sales months, so also a low cash position. That means we have a serious working capital challenge.

To tackle the above challenges, automation and efficiency rose in importance. Projects included Power BI for accurate sales reporting linked to ERP data and monitoring stock aging, Wick-to-Market for information flow and faster product launches, and digitalization of export obligations and in-and outgoing invoices.



“The Spaas Finance team is very proud to be nominated as ‘Best Finance team of the year’! This creates great vibes within our team!”

– Gert Hazevoets, CFO

THIS IS SPAAS

## KEY FINANCIAL FIGURES

KEY FINANCIAL FIGURES IN KEUR	2020	2021	2022
REVENUE	79,348 €	89,953 €	105,853 €
SOLVENCY	32,03%	38,28%	37,22%
ADDED VALUE	16,843 €	20,780 €	25,097 €
FTE	314	308	327



## CHAPTER 2

# ENVIRONMENT

### IN THIS SECTION

Tackle Climate Change	21-26
Waste Management	27-28
Commit to Sustainable Packaging	29
Address Critical Water Challenges	30
Environmental Performance Indicators	31-32

# TACKLE CLIMATE CHANGE

*Climate change's impacts are undeniable. Rising greenhouse gas concentrations affect people, business, and ecosystems worldwide through temperature increases, sea level rise, floods, shrinking glaciers, and indirect effects like water scarcity, poverty, and biodiversity loss.*

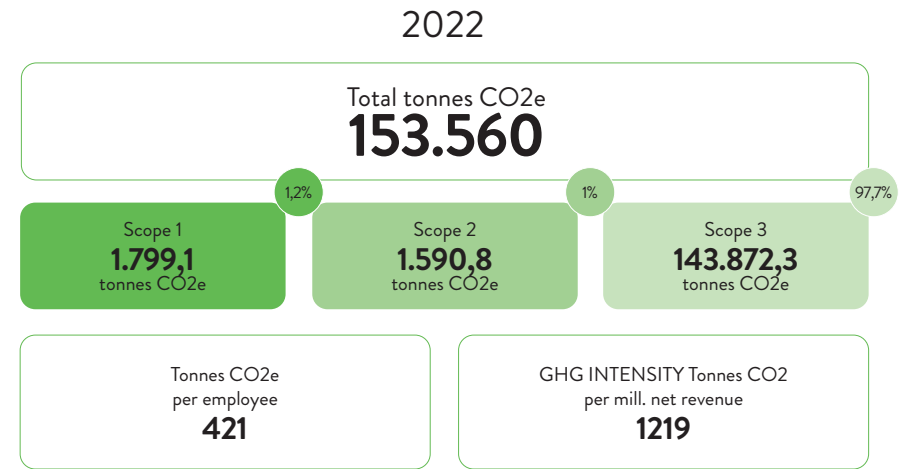
Our impact is divided into three scopes: scope 1 (energy combustion emissions), scope 2 (electricity usage), and scope 3 (supply chain emissions). To minimize these, we commit to the Paris Agreement, aiming to achieve climate neutrality by 2050. This commitment aligns with global efforts like the UN's Sustainable Development Goal 13 and the EU Green Deal.

To manage our ambition, we invest in product, process, and infrastructure innovations. We assess supplier risks and work collaboratively towards sustainable alternatives. We also plan to be able to calculate Product Carbon Footprints (PCF) in the future.

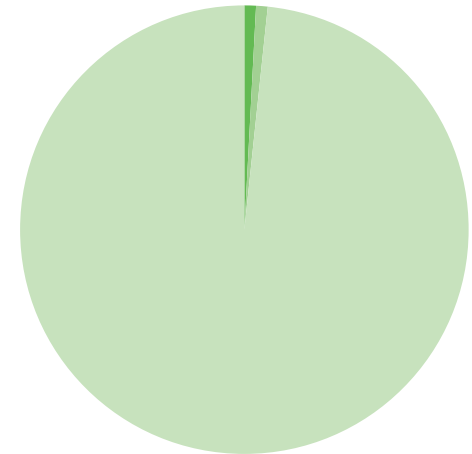
## CARBON FOOTPRINT CALCULATIONS

To measure is to know! Therefore, we have performed a carbon footprint calculation based on the globally recognized GHG protocol. We have used these guidelines to ensure the reliability, transparency and completeness of our calculations. We included both our Headquarters in Hamont and the Polish plant in our calculations. We assessed 14 categories, 5 were excluded because they were not relevant for us.

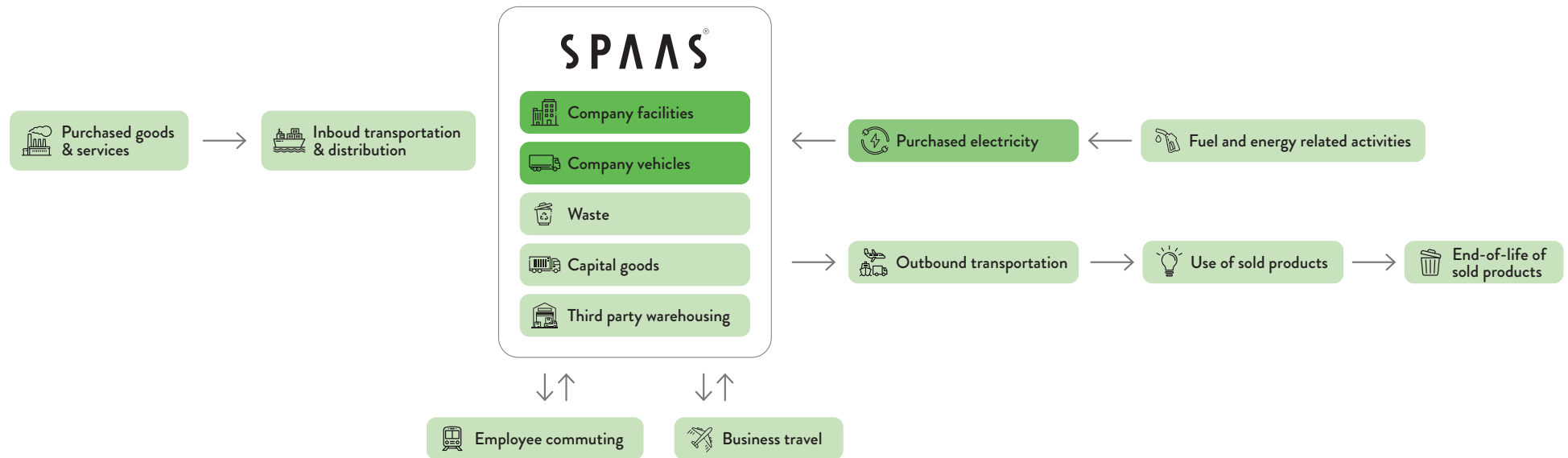
The "processing of sold products" as Spaas sells finished products that do not require further processing, "downstream/upstream leased assets" and "franchises" as Spaas has neither and "investments" as Spaas is not a financial institution with investing as its business model.



- Scope 1** - Direct emissions arising from directly controlled property, vehicles or processes
- Scope 2** - Indirect emissions arising from purchased electricity and district heating/cooling used in directly controlled property, vehicles or processes
- Scope 3** - Indirect emissions arising from subcontracted property, vehicles or processes



# TACKLE CLIMATE CHANGE



**Scope 1** - Direct emissions arising from directly controlled property, vehicles or processes

**Scope 2** - Indirect emissions arising from purchased electricity and district heating/cooling used in directly controlled property, vehicles or processes

**Scope 3** - Indirect emissions arising from subcontracted property, vehicles or processes

# TACKLE CLIMATE CHANGE

## SCOPE 1 + 2 EMISSIONS

### Energy efficiency in progress

We've been actively improving our energy efficiency through regular energy audits, with the most recent one conducted in 2023. As a result, we've introduced adiabatic cooling systems, gradual relighting project and arranged internal training sessions to promote energy conservation.

**We plan to** further invest in energy efficiency through insulation of pipelines and offices, reducing standby power, leak identification, etc.

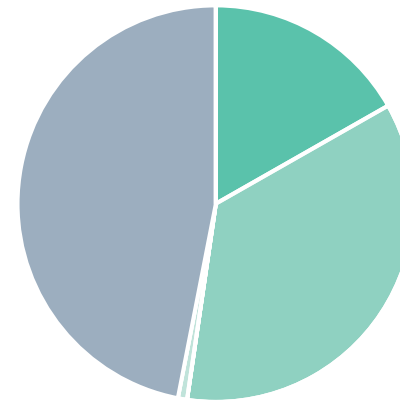
### Enabling the transition to renewable energy

To achieve a low-carbon future, scaling up access to renewable energy is crucial, and the demand for it is increasing. In 2021, we installed 2.172 solar panels in Hamont, generating 765 mWh of electrical power a year, accounting for approximately 20% of our annual consumption and saving around 250 tonnes of CO2 emissions compared to conventional electricity sources. The remaining 80% of our electricity is purchased, ensuring that Spaas Kaarsen Hamont relies on 100% "green" electricity

from solar and wind energy. Our goal is to have 100% on-site generated renewable electricity in Hamont by 2030. Currently, we are evaluating options to expand our solar panel coverage and collaborating with the city of Hamont, Engie, and other partners to install a wind turbine on our industrial site. This project will produce a total of 5833 MWh of electricity annually.

In Poland investing in renewable energy poses a challenge, especially since ENEA remains the exclusive energy provider and doesn't differentiate between eco-friendly and conventional energy transfers. Furthermore, the Polish government has been slow to invest in renewable energy initiatives. Despite solar panels not being cost-effective at our location and regulations preventing the installation of wind turbines, we are persistently exploring avenues to incorporate our Polish facility into our renewable energy objectives.

Please refer to page 49 for more details on our supplier engagement approach.



- Scope 1 - Fuel Oil consumption
- Scope 1 - Natural gas
- Scope 1 - Cooling
- Scope 1 - Company cars
- Scope 2 - Electricity consumption
- Scope 2 - Hybrid/Electric CV



# TACKLE CLIMATE CHANGE

## SCOPE 3 EMISSIONS

Scope 3 emissions originate from activities outside our operations in the value chain. Collecting data for scope 3 emissions presents challenges and highlights the need for partnerships and collaboration, as these emissions are controlled by other companies. We have implemented initiatives to reduce our scope 3 CO2e and recognize our responsibility for the impacts throughout our entire value chain through supplier CSR assessment criteria such as asking suppliers to measure their footprint and set reduction goals. Please refer to page 49 for more details on our supplier engagement approach.

### I. PURCHASED GOODS & SERVICES

As 46% of our emissions come from purchased goods and services, we acknowledge that this where we can make our biggest impact. As a result, Spaas includes various candle components in its innovation strategy, particularly emphasizing the effects of raw materials and packaging. While we also assessed the influence of the wick, its impact is comparatively lower. Therefore, this section predominantly centers on the former components.

### Raw materials

Reducing carbon emissions in the category of raw materials is a top priority, as they have the biggest impact on our purchased goods. Our blend strategy involves three key evolutions: a) transitioning towards the most sustainable raw materials available, b) increasing the percentage of renewable materials in our partial blends, and c) our long-term vision is to conduct market research for alternative materials as a gradual phase-out of fossil-based raw materials, while ensuring minimal environmental impact. Our decisions are informed by a life cycle assessment (LCA) analysis conducted in 2021.

### Paraffin

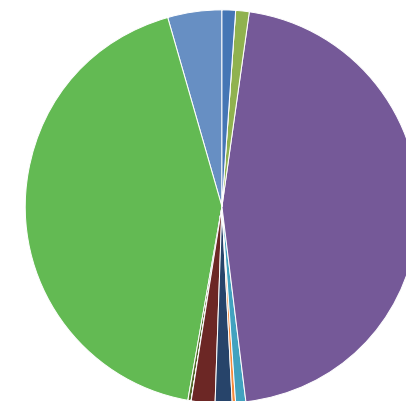
Despite paraffin's relatively positive environmental impact in the LCA analysis and its valorization as a by-product of lubricating oil production, its drawbacks lie in the net production of CO2 during combustion and abiotic depletion; therefore, due to the pressing issue of climate change, we have decided to gradually reduce paraffin usage and transition to renewable blends.

### Palm Oil (vegetable based stearic acid)

Although there may be controversy surrounding the use of palm oil and its derivatives, their high yield and availability make them an attractive natural wax option for candle blends. For customers who specifically request palm oil, we ensure that it is cultivated and processed sustainably. As a member of the Roundtable on Sustainable Palm Oil (RSPO) since 2016, we adhere to their guidelines for promoting sustainable palm oil usage and traceability worldwide. We offer palm oil under sustainability schemes like Book-and-Claim and Mass Balance, with the latter being used for all our brand products. Currently, we do not provide segregated palm blends due to low market demand and significant impact on our production processes. However, we are prepared to make the switch in the future if market demand increases.

For more info see p. 49

## CARBON FOOTPRINT 2022



- Company facilities
- Company vehicles
- Purchased electricity, steam, heating & cooling
- Purchased goods and services
- Capital goods
- Energy-related activities
- Upstream transportation and distribution
- Waste generated in operations
- Business travel
- Employee commuting
- Downstream transportation and distribution
- Use of sold products
- End-of-life of sold products



# TACKLE CLIMATE CHANGE

## Rapeseed

Among the renewable blends, plant-based raw materials such as rapeseed score good in terms of environmental impact.

## Wicks, colours & fragrances

The influence of wicks, colors and fragrances is negligible.

## Containers & Packaging

Packaging is a primary sustainability concern for numerous companies, including Spaas, and we actively strive to minimize the environmental impact of packaging and packaging waste on our CO<sub>2</sub>e footprint.

### I. OPTIMISING BUSINESS TRAVEL AND EMPLOYEE COMMUTING

Even though there was a decrease in business travel and employee commuting due to the COVID pandemic, we remain committed to promoting eco-friendly commuting alternatives. This includes initiatives like bike-to-work days, lease discounts, and the installation of charging stations for electric cars and bikes. When it comes to transportation to and from our production plant in Poland, our primary choice is electric cars.

### II. UPSTREAM AND DOWNSTREAM TRANSPORTATION AND DISTRIBUTION

We are currently assessing opportunities to switch to less impactful modes of transport for our downstream and inter-company transportation.

### III. USE OF SOLD PRODUCTS

The burning of the candle has a substantial impact on our scope 3 emissions (43%). Our gradual switch to renewable blends will diminish this impact. Further reducing this category is high on our agenda and we are exploring how we will do this. Furthermore, it is important to note that candles do not have a significant impact on your health. More info on page x

### IV. OTHER CATEGORIES (CAPITAL GOODS, END OF LIFE)

End of life waste management is an individual material topic. See page 27-28



# TACKLE CLIMATE CHANGE

COMPOSITION OF A TYPICAL CANDLE:

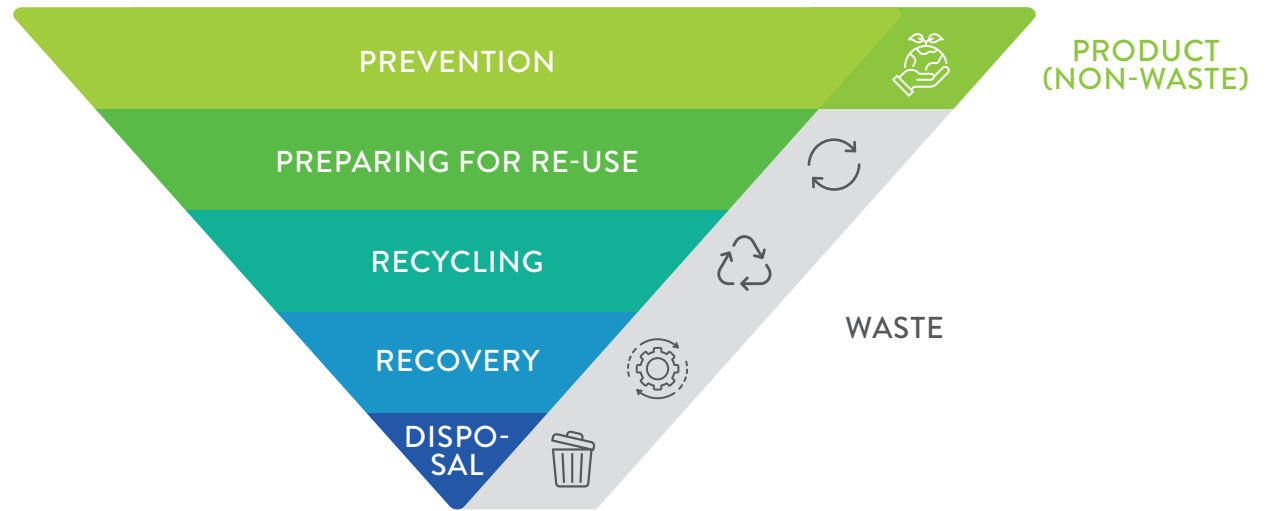


# WASTE MANAGEMENT

*In recent years, images of oceans and turtles full of plastic have received a lot of public attention. Spaas has not overlooked this single use plastic packaging crisis. We aim to minimize our company’s and our consumers’ impact by investing in responsible business where every waste stream is effectively managed - from product design and packaging to product manufacturing processes and consumer use. In this section, we discuss operational waste in more detail, in the next section sustainable packaging will be addressed.*

Our general strategy is based on the EU waste hierarchy from the European waste framework directive, the UN targets under SDG 12 as well as our regional “Flanders climate strategy 2050” and prepares us for the European Packaging and Packaging Waste regulation (PPWR). This allows us to effectively meet stakeholder expectations.

## WASTE HIERARCHY



### PREVENTION

We are constantly striving to improve material productivity, errors in production can cause a lot of process waste. For this we work closely together with our suppliers.

We invested in in-process waste prevention by reclaiming tealights from discarded tealight packaging recovering 50% of our rejected tealights and preventing 17 kg of raw material waste in a 12-month period.

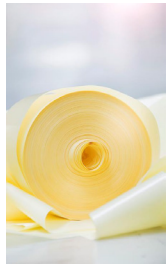
### PREPARING FOR RE-USE

Reuse is related to the consumer stage of waste streams such as refill systems. More information on page 29.

# WASTE MANAGEMENT

## RECYCLING

To reduce waste in our production 100% of our discarded paraffine (due to production errors or stock surpluses) is being recycled and reused in small portions in future production.



Spaas assesses opportunities for repurposing process waste streams. We have initiated a partnership with RAFCYCLE to transform carriers into new label carriers or newspapers. This collaboration allows us to reduce general waste by 8%.

We are working to replace all our single use cups across our operations in Hamont with reusable alternatives. This would account for 3% decrease in our general waste stream.

Spaas also recognizes the importance of separating waste at the source. Throughout production, there are roll-off containers for each waste fraction, we separate our waste in 12 waste streams. We do not incinerate waste ourselves and in Hamont our waste collectors have a CRP certification which refers to sustainable and circular recovery of old paper and cardboard.

## DISPOSAL

The following data represents the fiscal year 2022. The initial step towards investing in sustainable progress involves measuring and monitoring, enabling us to track and assess our performance in the upcoming year for comparison.

Waste Generated (tonnes)	2022
<b>Total waste</b>	<b>947</b>
<b>Waste diverted from disposal (tonnes)</b>	<b>597,2</b>
Reuse/repurpose	
onsite	13,4
offsite	196,1
Recycling offsite	387,6
<b>Total waste directed to disposal (non-hazardous)(tonnes)</b>	<b>350</b>

## PARTNERSHIPS & REPURPOSING

To enhance our knowledge and work towards innovative product developments we want to engage more with our stakeholder. To ensure a sustainability transition, we need to follow up on waste treatment mechanisms and institutions as well as regulations and ambitions.



## COMMIT TO SUSTAINABLE PACKAGING

*In the further development of our product range, Spaas wants to continue to balance an economic push towards flexibility and standardization and our ecological ambitions towards sustainable product choices. Within the packaging spectrum, we specifically focus on minimalist packaging, refill systems, recyclability and recycled content of our packaging. We also consider the life cycle when choosing our packaging materials.*

Our strategy is implemented through our internal sustainable packaging management structure consisting of a workgroup for strategic decision making and project groups for further technical development.

### PLASTICS

Our approach is not to ban plastic entirely, as we recognize its continued usefulness (e.g safety, transport, availability, etc.), and acknowledge that alternative options may not always be the most sustainable choice. Therefore, we are committed to conducting comprehensive sustainability assessments when making packaging decisions.

Our strategy revolves around minimizing the usage of new plastics, prioritizing designs that facilitate recycling, and promoting higher levels of recycled content. In the past year (2022), we successfully transitioned to packaging materials that are more easily recyclable and lighter in weight.

Moving forward, we will further enhance our capabilities, ensuring that the technical data sheets (TDS) of our products explicitly address recyclability considerations. Furthermore, We have established Design for Recycling (D4R) guidelines to facilitate implementation at both our facilities and train our marketing and procurement colleagues accordingly. In addition we promote the adoption of post-consumer household recycle (PCR).



# ADDRESS CRITICAL WATER CHALLENGES

Belgium is currently experiencing an increasing frequency of droughts. Moreover, a study conducted by the World Resources Institute (WRI) in August 2023 identified Belgium as one of the top 20 countries with extremely high water stress, highlighting the importance of water management as material topic.

For Spaas, water management means evaluating the local context of water stress, optimizing the use of intake water across our value chain and in our own operations and ensuring the quality of discharged water. This strategy is in line with the SDG Goal 6: ‘Ensure availability and sustainable management of water and sanitation for all’.

**Continuous Water Efficiency Improvement:** We are committed to enhancing water efficiency across all our sites by implementing advanced measures such as an adiabatic cooler and a closed cooling system. These technologies help optimize water consumption while maintaining operational effectiveness. On site water use is largely attributable to sanitary use. We promote circularity by recovering and utilizing rainwater for +- 5% of our sanitary needs, we have plans to extend this further.

**Water stress risk assessments:** we conduct annual assessments of contextual water risks, which include evaluating water stress and untreated wastewater, as well as ensuring access to clean and sufficient drinking water. Our Belgian headquarters has a general low-medium overall water risk, our Polish plant has an even lower risk.

**Discharge and risk of pollution, mainly in the own operations:** Any wastewater generated on-site is treated in accordance with local regulations to ensure compliance and environmental responsibility. After treatment, the wastewater is responsibly discharged into the environment, minimizing its impact on local ecosystems.

For our plant in Poland, an external firm assesses the water released (primarily sewage and cleaning water) semi-annually, following precise criteria concerning chemical levels for organic water contaminants such as Biological Oxygen Demand (BOD) or Chemical Oxygen Demand (COD). Poland is presently working on enhancing its water regulations, which will impose stricter wastewater standards. Once this legislation is approved, our testing procedures will align accordingly. Furthermore, in the previous year, we implemented a sewage purifier at our facility in Poland. This

purification system undergoes cleaning thrice annually and effectively filters our wastewater.

## Water withdrawal, use & consumption

<b>Water intake (m3)</b>	<b>2022</b>
Third-party water PL	4.221
Third-party water BE	3.969
TOTAL third-party water	8.190
Rainwater usage	193
<b>Total water Consumption In m3</b>	<b>8.382</b>
<b>Water efficiency (m3 per tonne of raw material)</b>	<b>0,24</b>

*\*no real time registration of rainwater use, based on estimations*

The total water usage is discharged to external treatment facility without treatment at our Spaas site.

## Upstream water usage

When assessing our water footprint, Spaas has the most significant impact in our upstream activities related to cultivating vegetable raw materials. Therefore we included water use in our suppliers responsible sourcing assessment.

# ENVIRONMENTAL IMPACT FACTORS

These metrics will become more insightful to track progress in the next reports when the current year can be compared with past performance.

KEY PERFORMANCE INDICATORS		2022
<b>ENERGY</b>		
<b>Direct energy: from primary sources (MW)</b>	Natural gas & heavy fuel oil	<b>8.042.141</b>
<b>Indirect energy: purchased electricity and steam (MW)</b>	Purchased electricity from renewable resources	<b>2.929.859</b>
	Electricity self-produced from renewable sources	<b>765.000</b>
	Grey electricity purchased	<b>2.241.203</b>
	Total indirect energy	<b>5.936.062</b>
<b>Total (direct + indirect) energy consumption (kWh)</b>		<b>13.978.203</b>
<b>Energy efficiency (kWh /tonnes of raw materials)</b>		<b>391</b>
<b>EMISSIONS</b>		
<b>Scope 1</b>	From direct energy sources	<b>1.799</b>
<b>Scope 2</b>	From indirect energy sources	<b>1.591</b>
	Total scope 1+ 2 GHG emissions direct and indirect	<b>3.390</b>
<b>Scope 3</b>	Purchased goods and services	<b>67.780,7</b>
	Capital goods	<b>986,5</b>
	Upstream transportation and distribution	<b>1.840,6</b>
	Waste generated in operations	<b>2.862,8</b>
	Business travel	<b>3,7</b>
	Employee commuting	<b>186,1</b>
	Downstream transportation and distribution	<b>193,4</b>
	Use of sold products	<b>63.018,2</b>
	Total scope 3 GHG emissions	<b>143.872</b>

# ENVIRONMENTAL IMPACT FACTORS

WASTE		
<b>Non-hazardous waste (tonnes)</b>	Total waste	947
	Waste diverted from disposal (tonnes)	597,2
	Reuse/repurpose	
	onsite	13,4
	offsite	196,1
	Recycling offsite	387,6
	Total waste directed to disposal (non-hazardous )(tonnes)	350
WATER		
<b>Water intake (m<sup>3</sup>)</b>	Purchased water	8.190
	Rainwater collected directly and stored by the reporting organization	193
	<b>Total water consumption</b>	<b>8.382</b>
<b>Water efficiency (m<sup>3</sup>/tonnes of raw materials)</b>		<b>0,24</b>
WEIGHT OF PURCHASED RAW MATERIALS (TONNES)		
	Hamont	24.997
	Stargard	9.744
	<b>Total</b>	<b>34.741</b>
WEIGHT OF PURCHASED PRODUCT PACKAGING (TONNES)		
	Plastic	228
	Paper/board	2841
	Aluminium/Metal	1194
	Glass	3388
	Wood	171
	<b>Total</b>	<b>7822</b>



## CHAPTER 3

# SOCIAL

### IN THIS SECTION

Social Sustainability	34
Providing A Diverse And Inclusive Workplace	35-37
Providing Access To Lifelong Learning	38-40
Ensuring A Safe, Healthy & Happy Work Environment	41-43
Product Quality, Health & Safety	45
Making A Social Impact	46

## SOCIAL

# SOCIAL SUSTAINABILITY

*At Spaas, we strive for a diverse workforce that reflects our society and prioritize social sustainability. We are committed to creating an inclusive environment where everyone has equal opportunities to succeed. We are committed to upholding human rights and ensuring fair labor conditions. This includes eradicating inequalities and promoting humane practices. We extend these principles to our partners in our supply chain to ensure that our products are the result of fair, healthy and inclusive work. More about this in the section on Responsible Sourcing. We endorse the UN Guiding Principles and ILO standards, with the CEO and Executive Committee overseeing implementation.*

Our dedication is outlined in the Spaas code of conduct and human rights statement, applicable to both our entities and supply chain partners. Through responsible sourcing policies and assessments, we engage our partners. We have a zero-tolerance policy for human rights abuses, enforce compliance through ethical certifications, and offer a confidential grievance mechanism for reporting without fear of retaliation for our own workforce as well as across the value chain. We are reviewing and refining our approach as we embark on a journey of continuous development and innovation.



## SOCIAL

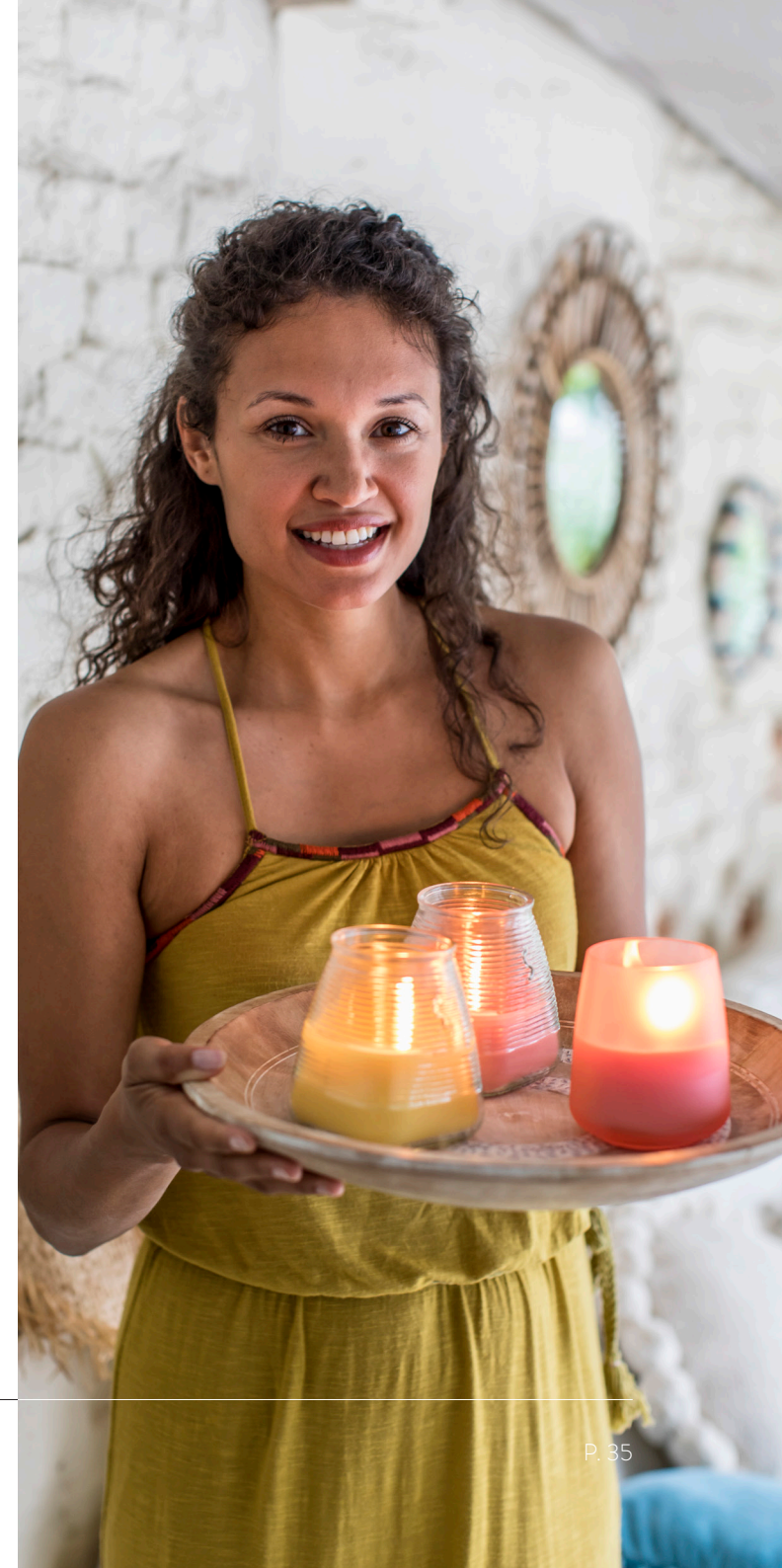
# PROVIDING A DIVERSE AND INCLUSIVE WORKPLACE

*With our Spaas flames we want to connect people, without exceptions of race, gender, ethnicity, religions or other irrelevant aspects. We want to create a workplace that reflects society and where everyone who walks in feels hospitality and a sense of belonging. Fundamental to reach this goal is the underlying and guiding principle “respect” that drives our daily business where everyone is equally valued, supported and engaged.*

The importance of this ambition goes beyond philosophical ideals, it is also a strategic imperative to reduce risks of turnover and loss of talent while seizing the opportunity to adapt to a rapidly changing world. Addressing demographic diversity poses challenges in terms of language communication, cultural differences and fostering inclusion among our staff. However, it also presents an opportunity, as diversity brings skills, different perspectives and ideas that fuel innovation and broaden our understanding of the global marketplace.

### OUR POLICIES & ACTIONS

At Spaas Kaarsen NV, we uphold specific values and principles concerning human rights, which are documented in our ETI base code and code of conduct. All employees have a responsibility to support and promote these principles. Our compliance is verified yearly by a SMETA audit in both our Belgian and Polish plants. The assessment follows a two-pillar approach, focusing on labor standards and health & safety. In the future, we plan to pay more attention to due diligence throughout the supply chain to minimize risks.



# PROVIDING A DIVERSE AND INCLUSIVE WORKPLACE

## RIGHT TO DECENT WORK, HEALTH, & WELLBEING

In line with our DNA as a family business and in line with SDG 8 of supporting decent work, we are committed to a supportive work environment for our people and their families.

We adhere to the National Welfare Act of 04-08-1996 and the Codex for Welfare at Work by annually compiling a well-being and health report. This report undergoes scrutiny by the prevention advisor and is a subject of discussion in the CPBW. Additionally, we frequently update our job profile-specific work fiches, providing comprehensive details on health and safety measures.

Next year we plan to conduct an employee satisfaction survey to assess the well-being of our employees.

## NON-DISCRIMINATION

Our code of conduct states to eradicate all forms of discrimination and fosters a company culture that ensures equal recruitment, employment and compensation for individuals regardless of age, gender, ethnicity, (dis)ability, marriage or civil partnership status, pregnancy or maternity status, race, religion,

political opinion or beliefs. In addition, our supplier code of conduct explicitly prohibits any kind of discrimination in our supply chain, emphasizing our dedication to equality and inclusivity.

For instance, since the start of the Russo-Ukrainian conflict, our plant in Stargard (Poland) has welcomed 36 Ukrainian colleagues. Spaas recognizes the importance to actively guide their inclusion and prevent them and other from feeling isolated. We therefore hired a multilingual (Polish, Ukrainian) HR employee. To ensure they feel comfortable to go with their problems. Trainings are given in both languages or subtitled and we have a Ukrainian versions of all our safety procedures, from safety inspections to toolbox sessions.

## ADEQUATE WAGE

Spaas Kaarsen NV consistently compensates its employees above the legally mandated minimum wage, remuneration is outlined in the labor regulations and are based on national wage scales and relevant collective bargaining agreements. Spaas verifies that new employees understand and recognize these regulations through their employment contract.



## PROVIDING A DIVERSE AND INCLUSIVE WORKPLACE

### CHILD LABOUR & FORCED LABOUR

Spaas Kaarsen NV has a strict policy against child and forced labor. An internal risk analysis has shown that the measures taken are effective and cover the risks. Among other things, the SMETA audit mentioned above checks the payrolls and ages of employees to ensure that no forced or child labor takes place.

Our Supplier Code of Conduct also explicitly prohibits any form of child or forced labor. We are working on risk assessment and due diligence in this area and plan to extend this to Tier 2 and Tier 3 suppliers.

### FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Spaas considers unions and employee representatives as crucial pillars of support for its workforce, fostering relationships built on respect and open communication.

The delegates from various trade unions (ACV and ABVV) sit on the Works Council, serving as the primary representatives of workers within the company and their main connection to the union. These trade union delegates naturally safeguard workers' interests and are legally protected against dismissal. They gather and convey information from the Works Council (OR)

and the Committee for Prevention and Protection at Work (CPBW) to workers, playing a crucial role in ensuring effective communication and representation of workers' interests during collective bargaining.

### GRIEVANCE MECHANISMS

Starting this year, we've implemented a whistleblower procedure to replace our previous grievance mechanism, the external prevention line, which had proven unresponsive. Our whistleblower procedure offers a safe and confidential channel to report incorrect behaviour of any kind. They offer people a chance to report misconduct without fearing reprisal or dismissal. We have extended this greivenache mechanism to both our workforce and the entire value chain. After a year of monitoring, we will evaluate the reports received. In future employee satisfaction surveys, we want to poll how familiar employees are with this tool.



# PROVIDING ACCESS TO LIFELONG LEARNING

*At Spaas we consider our employees our most valuable asset, we want to make our people feel valued and involved. Therefore we want to give all our employees the opportunities to develop their skills. Through our HR action plan we want to tackle both leaders and employees in this trajectory. We encourage them to develop, take responsibility and empower themselves, enhancing their sense of motivation and job satisfaction.*

The worldwide war for talent enhances the importance of this ambition. It intensifies competition to attract skilled workers where the skills required are becoming increasingly complex due to digitization, automation and rapid evolving regulations. For example technical support (automation engineers) as a critical skill is increasingly becoming important.

Additionally, many experience on the work floor will leave the company in the short term (retirement), emerging generations of workers have new expectations focused on social responsibility, including work-life balance, standing up for human rights and environmental initiatives.



These challenges demand strategic HR approaches that should include growth opportunities for all employees. By doing so, we transform these challenges into opportunities.

## OUR POLICY

For 2023, we will focus on extending learning opportunities to all of our people. Our training policy therefore has 3 components;

### 1. Concrete initiatives for each department

Our new training plan for 2023-2024 aims to meet legal standards, strengthen internal competencies, prepare the organization for production expansion and digitalization/automatization and achieve our KPIs and targets. The training plan lists formal and informal (e.g. fair visits, on-the-job training) trainings offered for each department.

#### Examples of initiatives are:

Health & Safety training (such as first aid, fire evacuation), Power BI, ergonomics, Acerta legislation training, Office 365, anti-phishing, ISO 14001, SAP transactions, recycling on packaging, etc.

# PROVIDING ACCESS TO LIFELONG LEARNING

## Individual training account

Each full-time employee is entitled to 4 days in 2023 and 5 days in 2025 to attend training of their choice.

## 2. Initiatives for at-risk groups

Employee category	Actions
Employees close to resignation	Follow-up interviews aimed at strengthening competencies
Persons with reduced ability to work	If a modified job is possible, on -the-job training to teach employee appropriate competencies.
People who have been working for less than a year and were not working at the time of their employment	Introductory program + internal on-the-job training.

The training plan was validated by the work council. We provide our employees with extensive information about these programmes and new initiatives through newsletters and individual conversations with departmental managers.

## OUR ACTIONS

### COACHING & TRAINING

We want to enable **employee learning** by giving continuous feedback. Our monthly one to one talks are designed to increase the frequency of feedback, making leaders accountable for growing people through ongoing coaching. We also have yearly dialogue talks to discuss, evaluate and improve.

Besides the preset training plan per department as described in the policy, internal **trainings** are given ad-hoc by departmental managers (e.g. packaging regulations, design for recycling principles, etc.).

### BLUE COLLAR EMPLOYEES

New blue collar employees at Spaas Kaarsen NV are guided by experienced colleagues and overseen by shift leaders. One staff member has primary responsibility for training and mentoring new employees. Monthly follow-ups with HR and the production manager ensure effective onboarding. A motivation system introduced in 2021 allows blue-collar workers to specialize and receive training, distinguishing between generalists and specialists based on their knowledge of production lines.

### LEADERS

**Future-proof leaders** is another aspect of our upskilling strategy. We strive for leaders and teams that push towards their full potential and add value to the company while upholding our corporate values by being trustworthy, connected, involved and proactive. To achieve this, Spaas organizes workshops and trainings on project management, leadership skills and conversation techniques.



# PROVIDING ACCESS TO LIFELONG LEARNING

## ACHIEVEMENTS & MONITORING

We will continue to track training and plan to conduct an overall satisfaction survey of all our employees that will include satisfaction in training and development opportunities.



100% of our employees completed at least one training



Average of 21 hours of formal training per employee





# ENSURING A SAFE, HEALTHY & HAPPY WORK ENVIRONMENT

*Occupational health and safety is very important to Spaas, as it recognizes the significance of a healthy and secure work environment in safeguarding employee well-being, motivation, and the overall productivity and competitiveness of the Group.*

We strongly believe in managed safety instead of regulated safety: we focus on raising awareness about unsafe behavior, promoting a mindful attitude, and using constructive feedback techniques.

An unsafe workplace increases the risk of workplace accidents and work-related illnesses. The consequences extend beyond the individual affected workers and their families, Spaas also risk financial burdens in the form of lost days, illness compensation, disruptions to supply chains, as well as lost productivity and reputational damage. Prioritizing safety is thus both a social and strategic decision for operational excellence.

## OUR POLICIES

### Health & Safety

We have the necessary procedures in place to create an environment where health and safety is guaranteed. Moreover, quality is guaranteed by our ISO 9001:2015 audit system and certificate

Our safety system is based on three pillars:

- **Safe equipment and workplaces**
- **Well-known procedures and tools:** we operate according to our internal health and safety standards and procedures which are regularly communicated to our employees.
- **Competent and engaged people:** we offer our associates basic and specific safety trainings.
- **Yearly Action Plan for Health & Safety:** The prevention advisor, based on internal and external audits and risk analyses, has developed a yearly action plan to address shortcomings and obligations related to health and safety. The plan outlines specific goals and commitments to ensure employees' well-being.

### Wellbeing

Regarding wellbeing, at Spaas we believe that communication is key for wellbeing. Making time to engage in dialogue, both to listen and to talk, building connections with colleagues and managers, asking for, giving and receiving feedback, encouraging openness, daring to point things out, engaging in constructive dialogue and clear communication makes us the team we are today. Another aspect of wellbeing is making employees feel like they make a valuable contribution to the Dream of Spaas, giving them the chance to take responsibility and develop.

# ENSURING A SAFE, HEALTHY & HAPPY WORK ENVIRONMENT

## OUR ACTIONS

### Safety inspections

The yearly Smeta audit mentioned above also assesses health and safety aspects such as payment of wages, child labour, application of our code of ethics, verification of risk assessments, ...

Storage of hazardous substances: Our external environmental advisor, Thimad, conducted an environmental inspection in light of the upcoming ISO 14001 certification. All Spaas sites are since 1997 certified according to the ISO 9001 standard (quality management) and is currently working towards a ISO 14001 certification (environmental management) both in Hamont and in Stargard, our aim is to achieve this by 2024 in Belgium and 2025 in Poland

Quality conducts monthly safety/environmental/quality/ethical inspection rounds directly alerting workers to their risks and serving as the basis for future safety toolboxes.

### Safety toolboxes

To actively reduce occupational injuries and prioritize employee well-being, Spaas implements multiple

training sessions tailored to both blue collar and white collar workers. Blue collar workers receive regular training sessions aimed at addressing safety concerns specific to their roles. Specifically, this pertains to the dangers of noise pollution and the mandatory use of hearing protection, hazardous products, safety equipment, and general risks such as falls from heights, entrapment hazards, hot components, and so on. Following local regulations, these trainings - we call them toolboxes - take place in Poland either every year (general health and safety), every 5 years (e.g., first aid, fire safety) or when needed (forklifts, moving platforms, chemicals, etc.).

On the other hand, white collar workers are provided with training in ergonomics, focusing on creating a safe and healthy office environment. By including all employees in these specialized trainings, Spaas aims to foster a culture of safety and ensure the well-being of its workforce.

### Peer&peer awareness

Every Spaas employee is required to take reasonable care in the workplace for their own health and safety, and for that of other. Employees are encouraged to

report any situation they consider dangerous and to openly discuss unsafe conditions and activities with colleagues.

### Safety instructions

The safety instructions are translated into the common languages used in the Polish production plant, including Polish and Ukrainian. Additionally, minor adjustments are made based on specific Polish legislation and safety standards. To support these efforts, an external safety advisor has been appointed in Poland.

### Risk analysis and corrective action plans

Spaas health & safety policy states that it carries out periodic assessments of risks within the workplace, this is done by an external expert from IDEWE. As a consequence control measures are taken where necessary.

Internal annual review of product and process risk assessments, including health,safety and quality related risks.

Furthermore, we conduct thorough pregnancy-related risk assessments, including chemical hazards, noise, and vibration. We prioritize the well-being of our employees

# ENSURING A SAFE, HEALTHY & HAPPY WORK ENVIRONMENT

by making necessary adjustments in office spaces and implementing restrictions, if needed, for certain areas or job duties. Moreover, we maintain an emission assessment report for laboratory emissions and conduct a thorough chemical risk assessment for the safe handling and management of chemical exposure in our production processes.

## World Day for Safety & Health at Work

On Friday, April 28th, we celebrated the World Day for Safety and Health at Work at Spaas Kaarsen. We organized a safety week with training sessions for both employees and workers.

## General employee wellbeing

We plan to conduct a satisfaction survey in 2024 to assess the well-being of our employees. To celebrate our 170 year existence, Spaas organized a trip to Poland with the whole company, this fueled the connection between employees.

## OUR ACHIEVEMENTS IN 2022 & MONITORING

Health & Safety Indicators	FY 2022
Number of recordable work related injuries	16
Number of lost days	358
Number of hours worked	976157
Frequency rate (#lost days x 1,000,000 /# working hours)	16,4





## PRODUCT QUALITY, HEALTH & SAFETY

*At Spaas, one of our top priorities is ensuring our products are safe and comply with high quality standards and all applicable laws, regulations and customer requirements.*

### OUR POLICIES AND STANDARDS



Spaas candles come with the internationally recognized **RAL** quality certificate. This certificate stands for high-quality and safe<sup>3</sup> products. and raw materials (e.g. for heavy metals). All our products are compared and tested in our laboratories and we have an annual inspection done at an external lab. We ensure that the soot emissions, flame size, burn time, visual properties, aftersmoke/ afterglow and measures of our candles comply with the RAL standards.



The BRC Consumer Products label ensures quality, safety and legality of the product. Focusing on: full traceability, product-process risk analysis, internal audits, corrective and preventive actions, etc.



As for fragrances, scented candles gain popularity hence fragrances play a vital role in our products. Currently, Spaas uses fragrances that consist mainly of synthetic components with added natural ingredients. We prioritize

sustainability and recognize that sourcing and transporting natural ingredients can have a large environmental footprint. That is why we do not aim for 100% natural fragrances. The sustainability of these components is enhanced by legislation, such as Reach, which prohibits the use of harmful metals or chemicals.

Our **ISO 9001** certificate proves our achieved standards of our quality management system. We verify the implementation of quality requirements at our sites with internal audits.

Quality data about our products, including safety information, are available through product labels and safety data sheets. They are available to customers on request.

**'General safety requirements'**: apply to all candles sold in EU

- EN 15494: specification for product safety labels
- EN 15493: specification for fire safety
- EN 15426: specification for sooting behavior
- EN 17616: outdoor candles – specification for fire safety
- EN 17617: outdoor candles – product safety labels

**'General emission safety requirements'**: apply to all candles sold in EU

- EN 16738 Emission safety of combustible air fresheners – Test methods
- EN 16739 Emission safety of combustible air fresheners – Methodology for the assessment of test results and application of recommended emission limits
- EN 16740 Emission safety of combustible air fresheners – User safety information

Our ISO 9001 certificate proves our achieved standards of our quality management system. We verify the implementation of quality requirements at our sites with internal audits.

Quality data about our products, including safety information, are available through product labels and safety data sheets. They are available to customers on request.

The following product and service information is required for labelling by regulations and the organization's procedures and is applicable to 100% of our products; content, safe use and disposal.

<sup>3</sup>confirming that the products are made from raw materials free from heavy metals, solvents or other harmful substances, and in line with the safety standards.

## SOCIAL

# MAKING A SOCIAL IMPACT

*Social sustainability reaches beyond our own workforce. With our Spaas flames we want to bring light to peoples everyday life.*

We are proud to support “Levensloop,” an organization dedicated to the fight against cancer. Furthermore, during the challenging times of the COVID-19 pandemic, we distributed 6,294 support candles, hoping to provide comfort to numerous caregivers facing difficult circumstances.

The ongoing conflict in Ukraine has also deeply impacted us. We took three meaningful initiatives to offer assistance. These included collecting essential suppliers such as winter coats, blankets, stuffed animals, and toilet paper. Additionally, we contributed 2,688 candles in glass. Furthermore, we extended financial support to our colleagues in Poland who are actively helping Ukrainian refugees, ultimately assisting 44 families in their time of need.



### SPAAS CANDLES HAVE NO SIGNIFICANT IMPACT ON YOUR HEALTH

To minimize the emission of potentially harmful substances, we prioritize using high-quality base materials and appropriate wicks tailored to the composition and shape of our candles. Our materials and finished products comply with relevant chemical legislation, product safety regulations, and industry standards. Our quality team conducts regular internal tests to ensure compliance. It is important for consumers to follow the use instructions provided on our candle labels to maintain safe emissions and fire safety.



SOCIAL

# SOCIAL INDICATORS

## PEOPLE

Total turnover, excl retirement, %	11%
Yearly performance and development discussion, %	100%
Average training hours per employee	21
Proportion of female employees, % year end	50%
Proportion of female managers, % year end	50%

## SAFETY AND WELLBEING

Recordable injuries	16
Lost days	358
Frequency rate (injuries per million working hours)	16,4
Fatalities number	0

	PERMANENT		TEMPORARY		TOTAL		
	Women	Men	Women	Men	Women	Men	TOTAL
HAMONT	38	59	0	0	38	59	97
STARGARD	120	23	26	7	146	30	176
<b>TOTAL 2022</b>	<b>158</b>	<b>82</b>	<b>26</b>	<b>7</b>	<b>148</b>	<b>89</b>	<b>273</b>



CHAPTER 4

# GOVERNANCE

## IN THIS SECTION

Responsible Sourcing 49-50

EU Taxonomy 51-52



## RESPONSIBLE SOURCING

*At Spaas, we recognize our role and responsibility in ESG throughout our value chain. From the wick to the wax, every part matters. We seek partners who share our vision for sustainability, ethical practices and environmental stewardship and review our partnerships when needed. This proactive approach helps us mitigate potential risks within our supply chain and ensures our adherence to international regulations.*

One of our challenges is the uncertainty and the importance of local communities in a global economy. We hold high regard for the human rights of individuals in communities affected by our operations.

### OUR RESPONSIBLE SOURCING POLICY

To ensure our suppliers share our environmental and societal values, we require them to endorse our Supplier Code of Conduct. Nearly all our key suppliers have already done so or have created their own codes aligning with ours. We've updated our Code to match our standards and those of our customers, and we'll share the revised version in 2024.

Furthermore, we actively engage in supply chain management by assessing strategic suppliers based on their CSR, Quality, and Price & Deliverability risks. We employ self-assessment checklists and regular on-site evaluations. The suppliers with the lowest scores, are asked for an improvement action plan to drive continuous enhancement and accountability. We collaborate closely with these suppliers to establish partnerships, and offer guidance, ensuring a balanced approach to producing high-quality, cost-effective, and sustainable products.

Our dedicated responsible sourcing team, consisting of quality, purchasing, and sustainability managers, oversees these efforts and places emphasis on local purchasing to foster stronger connections with regional suppliers.

As we continue to expand our supplier engagement, we aim to include tier 1, tier 2, and tier 3 suppliers, further reinforcing our commitment to responsible sourcing practices.



# RESPONSIBLE SOURCING

## OUR ACTIONS

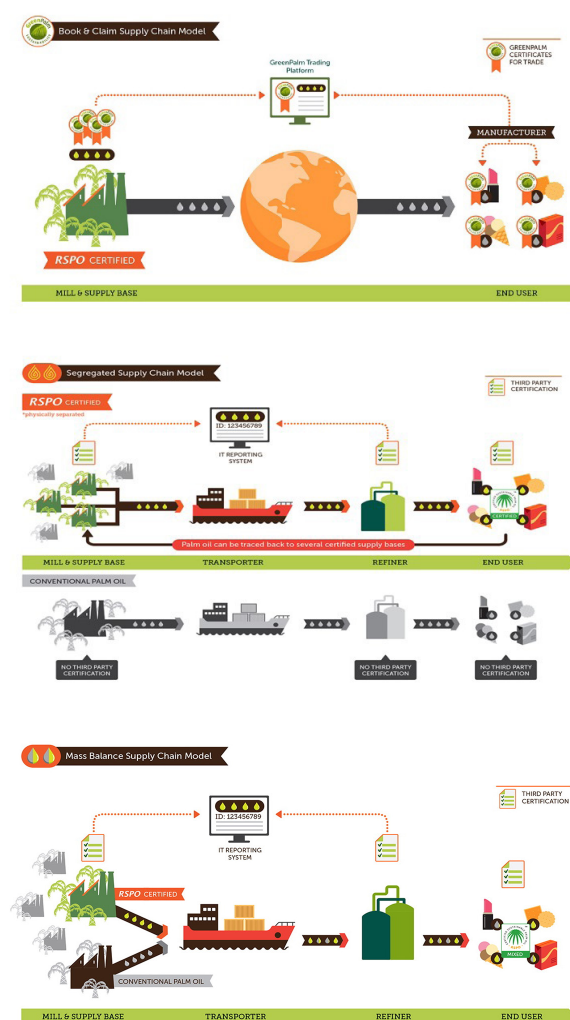
Spaas uses palm oil as raw material and plant-based alternative candle blend. For more information on the choice of this material see section x. We take all the necessary measures to minimise the environmental and social risks associated with palm oil cultivation and production. These risks include deforestation, loss of biodiversity, the exploitation of local farmers and other issues.

Since 2016, we've been a member of the Roundtable on Sustainable Palm Oil (RSPO). This is an umbrella organization of stakeholders in the palm industry such as palm oil processors, consumer product manufacturers, retailers, banks, NGOs, and more. RSPO's primary goal is to establish social and environmental standards for palm oil farmers. These standards encompass various aspects, including minimum wages, pesticide usage, wastewater management, anti-deforestation efforts, fair pricing for palm farmers, and overall sustainability to ensure the production of environmentally and socially responsible palm oil.

All our palm oil is RSPO-certified with Book and Claim as a minimum, which means we purchase RSPO-certified palm oil certificates, which represent support for sustainable palm oil production, without physically processing or trading certified palm oil ourselves. Since 2023 we have switched to the Mass Balance Supply

Chain Model for all Spaas brand products, which means that sustainable and non-sustainable palm oil is mixed in the supply chain and the total volume of sustainable palm oil equals the volume of RSPO certified sustainable palm oil purchased. We have not yet made the step towards the segregated scheme – as to switch to only palm oil from certified sources - because this would be an all or nothing scenario where we switch all our palm oil to segregated because of the strict production process requirements. We keep on nudging our private label customers to switch to MB.

We predict a future demand for certified cotton (e.g. GOTS, better cotton initiative) and are assessing our options in this regard.



## EU TAXONOMY

*The taxonomy is a classification system for economic activities considered environmentally sustainable and provides a methodology to calculate how green or in linewith net zero by 2050 a company's turnover, CAPEX & OPEX are. It consists of six environmental objectives of which two are relevant for the financial year 2022: climate change mitigation and climate change adaptation.*

Similar to various other sustainability issues, sustainable finance is rapidly gaining momentum. Financial institutions are actively shifting towards more sustainable approaches and are expecting a similar commitment from their clients. Through the utilization of the EU taxonomy, these institutions aim to motivate companies to adopt sustainable practices and to ensure the sustainability of their own investments.



To ensure the accuracy of our EU taxonomy reporting, we've joined the GREENOMY pilot project—a startup that assists companies in understanding sustainable finance regulations and calculates EU taxonomy compliance based on Turnover, CapEx, and OpEx.

The pilot began with one company activity for testing. Consequently, our taxonomy report (see attachment 1) focuses on a single eligible and aligned activity. We are striving to provide a complete report by next year.

The EU taxonomy distinguishes between eligibility and alignment. An eligible activity contributes to one of six climate and environmental objectives. These are: (1) climate change mitigation, (2) climate change adaptation, (3) sustainable use and protection of water and marine resources, (4) transition to a circular economy, (5) pollution prevention and control, and (6) protection and restoration of biodiversity and ecosystems. An aligned activity meets four conditions: significant environmental contribution, no harm to other objectives and adherence to social safeguards.

### DOING NO SIGNIFICANT HARM

Doing no significant harm Taxonomy alignment requires positive contribution to at least one of the taxonomy environmental objectives while doing no significant harm to any of the other objectives. The taxonomy specifies specific criteria as to what constitutes doing harm and what type of assessment a company should perform to evaluate such potential harmdoing.

Spaas has assessed the activity of placing solar panels, which contributes to mitigating climate change, against the do no harm requirements by doing a climate risk and vulnerability assessment on floods and windstorms, a circular economy assessment and an environmental impact assessment. The conclusion is that no significant harm is done. We want to expand this assessment to other climate risk factors.

# EU TAXONOMY

## CLIMATE & VULNERABILITY ASSESSMENT FLOODS & WIND HAMONT

According to the Flanders flood risk map, under future climate projections and the low-likelihood scenario (corresponding to an event with a return period of 1000 years), no fluvial flood risk is detected. Small water accumulation could occur in the building vicinity in case of heavy rainfall episodes but the limited water depth and flow rate do not constitute a significant threat for the building integrity.

According to a 2020 Technical report by the Joint Research Centre (JRC) and the European Commission, climate model projections of extreme wind suggest that windstorms will not become more intense or happen more frequently with global warming over most of the European land. In Central Western Europe, the trend points rather towards a decrease of max wind speed. As a consequence, it is expected that risks from windstorms in the EU will not rise due to climate change.

This leads us to the conclusion that the risk can be considered as non-material and, consequently, no adaptation solution is required.

## MEETING THE MINIMUM SAFEGUARDS

The EU taxonomy references adherence to the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work and the International Bill of Human Rights. Spaas has assessed compliance against the Minimum Safeguards requirements and our company policies align with these criteria.

## CONCLUSION

With our test activity (solar panels) within the climate mitigation objective we achieve 31.8% of our total CAPEX- reasonable, since our main activity (candle production) is not eligible. OPEX and TURNOVER were not measured.

## FUTURE DEVELOPMENTS

As the taxonomy evolves to include four additional environmental objectives, we will add to our current report and identify remaining activities.

# GRI CONTENT INDEX

DISCLOSURE		OMISSION		PAGE
		REQUIREMENT(S) OMITTED	REASON	
<b>THE ORGANISATION AND HIS REPORTING PRACTICES</b>				
2-1	Organizational details			2
2-2	Entities included in the organization's sustainability reporting			2
2-3	Reporting period, frequency and contact point			2
2-4	Restatements of information	No restatements of information	This is our first sustainability report	
2-5	External assurance		BDO did a readiness assessment of the report	
<b>ACTIVITIES AND WORKERS</b>				
2-6	Activities, value chain and other business relationships			11
2-7	Employees			47
2-8	Workers who are not employees		Information not yet fully consolidated	
2-9	Governance structure and composition			5-7
2-10	Nomination and selection of the highest governance body			5-7
2-11	Chair of the highest governance body			5-7
2-12	Role of the highest governance body in overseeing the management of impacts			5-7
2-13	Delegation of responsibility for managing impacts			5-7
2-14	Role of the highest governance body in sustainability reporting			6
2-15	Conflicts of interest		Information not yet fully consolidated	
2-16	Communication of critical concerns		Information not yet fully consolidated	
2-17	Collective knowledge of the highest governance body		Information not yet fully consolidated	
2-18	Evaluation of the performance of the highest governance body		Information not yet fully consolidated	
2-19	Remuneration policies		Information not yet fully consolidated	
2-20	Process to determine remuneration		Information not yet fully consolidated	
2-21	Annual total compensation ratio			
2-22	Statement on sustainable development strategy			14-16
2-23	Policy commitments			14-16
2-24	Embedding policy commitments			1-65
2-25	Processes to remediate negative impacts		Information not yet fully consolidated	
2-26	Mechanisms for seeking advice and raising concerns			37
2-27	Compliance with laws and regulations			1-65
2-28	Membership associations			34
2-29	Approach to stakeholder engagement			11
2-30	Collective bargaining agreements			37

# GRI CONTENT INDEX

DISCLOSURE	OMISSION		PAGE
	REQUIREMENT(S) OMITTED	REASON	
<b>GRI 3: MATERIAL TOPICS</b>			
3-1	Process to determine material topics		12-13
3-2	List of material topics		13
3-3	Management of material topics		12
<b>GRI 201: ECONOMIC PERFORMANCE</b>			
201-1	Direct economic value generated and distributed		19
201-2	Financial implications and other risks and opportunities due to climate change		17-18
<b>GRI 301: MATERIALS</b>			
3-3	Management of material topics		29
301-1	Materials used by weight or volume		32
<b>GRI 302: ENERGY</b>			
3-3	Management of material topics		23
302-1	Energy consumption within the organization		23, 31
302-2	Energy consumption outside of the organization		23, 31
302-3	Energy intensity		23, 31
<b>GRI 303: WATER AND EFFLUENTS</b>			
3-3	Management of material topics		30
303-1	Interactions with water as a shared resource		30
303-2	Management of water discharge-related impacts		30
303-3	Water withdrawal		30, 32
303-4	Water discharge	No discharge data	Information not yet fully consolidated
303-5	Water consumption		30, 32
<b>GRI 305: EMISSIONS</b>			
3-3	Management of material topics		21-25
305-1	Direct (Scope 1) GHG emissions		21-23, 31
305-2	Energy indirect (Scope 2) GHG emissions		21-23, 31
305-3	Other indirect (Scope 3) GHG emissions		21-22, 24-25, 31
305-4	GHG emissions intensity		21
305-5	Reduction of GHG emissions		15

# GRI CONTENT INDEX

DISCLOSURE	OMISSION		PAGE
	REQUIREMENT(S) OMITTED	REASON	
<b>GRI 306: WASTE</b>			
3-3	Management of material topics		27-28
306-1	Waste generation and significant waste-related impacts		27-28
306-2	Management of significant waste-related impacts		27-28
306-3	Waste generated		28, 32
306-4	Waste diverted from disposal		28, 32
306-5	Waste directed to disposal		28, 32
<b>GRI 401: EMPLOYMENT</b>			
3-3	Management of material topics		34-43
401-1	New employee hires and employee turnover		47
<b>GRI 403: OCCUPATIONAL HEALTH AND SAFETY</b>			
3-3	Management of material topics		41-44
403-1	Occupational health and safety management system		41
403-2	Hazard identification, risk assessment, and incident investigation		42
403-3	Occupational health services		41-44
403-4	Worker participation, consultation, and communication on occupational health and safety		39
403-5	Worker training on occupational health and safety		41-42
403-6	Promotion of worker health		41-44
403-9	Work-related injuries	The main types of work-related injuries. The same numbers for all workers who are not employees but whose work an/or workplace is controlled by the organisation.	Information not yet fully consolidated 43
<b>GRI 404: TRAINING AND EDUCATION</b>			
3-3	Management of material topics		38-40
404-1	Average hours of training per year per employee		40
404-2	Programs for upgrading employee skills and transition assistance programs		38-40
404-3	Percentage of employees receiving regular performance and career development reviews		40

# GRI CONTENT INDEX

DISCLOSURE		OMISSION		PAGE
		REQUIREMENT(S) OMITTED	REASON	
<b>GRI 405: DIVERSITY AND EQUAL OPPORTUNITY</b>				
3-3	Management of material topics			35-37
405-1	Diversity of governance bodies and employees			16
405-2	Ratio of basic salary and remuneration of women to men	Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation.	Information incomplete	
<b>GRI 406: NON-DISCRIMINATION</b>				
3-3	Management of material topics			35-37
406-1	Incidents of discrimination and corrective actions taken	No incidents of discrimination were recorded	Whistleblower since 2023	
<b>GRI 413: LOCAL COMMUNITIES</b>				
3-3	Management of material topics			16, 46
413-1	Operations with local community engagement, impact assessments, and development programs			46
<b>GRI 416: CUSTOMER HEALTH AND SAFETY</b>				
3-3	Management of material topics			45
416-1	Assessment of the health and safety impacts of product and service categories			45
<b>GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT</b>				
3-3	Management of material topics			49-50
308-1	New suppliers that were screened using environmental criteria		Percentage of all critical suppliers verified according to our sustainability criteria	16, 49-50
308-2	Negative environmental impacts in the supply chain and actions taken			49-50
<b>GRI 414: SUPPLIER SOCIAL ASSESSMENT</b>				
3-3	Management of material topics			49-50
414-1	New suppliers that were screened using social criteria		Percentage of all direct key suppliers that signed our Supplier Code of Conduct.	16, 49-50
414-2	Negative social impacts in the supply chain and actions taken			49-50



# ATTACHMENTS

## EU TAXONOMY

(1/3)

Template: Proportion of turnover from products or services associated with Taxonomy-aligned economic activities  
Disclosure covering year: 2022

Economic activities (1)	Codes (2)	Absolute turnover (3) eur	Proportion of turnover (4) %	Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm')						Minimum safeguards (17) Y/N	Taxonomy-aligned proportion of turnover, year N (18) Percent	Taxonomy-aligned proportion of turnover, year N-1 (19) Percent	Category (enabling activity or) (20) E	'Category (transitional activity)' (21) T
				Climate change mitigation (5) %	Climate change adaptation (6) %	Water and marine resources (7) %	Circular economy (8) %	Pollution (9) %	Biodiversity and ecosystems (10) %	Climate change mitigation (11) Y/N	Climate change adaptation (12) Y/N	Water and marine resources (13) Y/N	Circular economy (14) Y/N	Pollution (15) Y/N	Biodiversity and ecosystems (16) Y/N					
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0,00	0,00%	0,00%	0,00%												0,00%			
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0,00	0,00%																	
<b>Total (A.1 + A.2)</b>		0,00	0,00%														0,00%		0,00%	0,00%
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
Turnover of Taxonomy-non-eligible activities (B)		112.032.548,00	100,00%																	
<b>Total (A + B)</b>		112.032.548,00	100,00%																	

# ATTACHMENTS

## EU TAXONOMY

(2/3)

Template: Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities  
Disclosure covering year: 2022

Economic activities (1)	Codes (2)	Absolute turnover (3) eur	Proportion of turnover (4) %	Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm')						Minimum safeguards (17) Y/N	Taxonomy-aligned proportion of turnover, year N (18) Percent	Taxonomy-aligned proportion of turnover, year N-1 (19) Percent	Category (enabling activity or) (20) E	'Category (transitional activity)' (21) T
				Climate change mitigation (5) %	Climate change adaptation (6) %	Water and marine resources (7) %	Circular economy (8) %	Pollution (9) %	Biodiversity and ecosystems (10) %	Climate change mitigation (11) Y/N	Climate change adaptation (12) Y/N	Water and marine resources (13) Y/N	Circular economy (14) Y/N	Pollution (15) Y/N	Biodiversity and ecosystems (16) Y/N					
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																				
Electricity generation using solar photovoltaic technology	D35.11	446.000,00	31,79%	31,79%	0,00%						Y	Y	Y	Y	Y	Y				
<b>CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		446.000,00	31,79%	31,79%	0,00%															
<b>A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																				
<b>CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		0,00	0,00%																	
<b>Total (A.1 + A.2)</b>		446.000,00	31,79%														0,00%		0,00%	0,00%
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
<b>CapEx of Taxonomy-non-eligible activities (B)</b>		957.089,00	68,21%																	
<b>Total (A + B)</b>		1.403.089,00	100,00%																	

# ATTACHMENTS

## EU TAXONOMY

(3/3)

Template: Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities  
Disclosure covering year: 2022

Economic activities (1)	Codes (2)	Absolute turnover (3) eur	Proportion of turnover (4) %	Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm')						Minimum safeguards (17) Y/N	Taxonomy-aligned proportion of turnover, year N (18) Percent	Taxonomy-aligned proportion of turnover, year N-1 (19) Percent	Category (enabling activity or) (20) E	'Category (transitional activity)' (21) T
				Climate change mitigation (5) %	Climate change adaptation (6) %	Water and marine resources (7) %	Circular economy (8) %	Pollution (9) %	Biodiversity and ecosystems (10) %	Climate change mitigation (11) Y/N	Climate change adaptation (12) Y/N	Water and marine resources (13) Y/N	Circular economy (14) Y/N	Pollution (15) Y/N	Biodiversity and ecosystems (16) Y/N					
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0,00	0,00%	0,00%	0,00%												0,00%			
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
Opex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0,00	0,00%																	
<b>Total (A.1 + A.2)</b>		0,00	0,00%														0,00%		0,00%	0,00%
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
OpEx of Taxonomy-non-eligible activities (B)		114.387.872,00	100,00%																	
<b>Total (A + B)</b>		114.387.872,00	100,00%																	



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