



Corporate Social Responsibility report, 2020

ACO Nordic Group A/S

1.- MESSAGE FROM THE CEO

The year 2020 will be remembered by the global disruption brought up by COVID-19. Needless to say, a lot of attention and leadership energy has been put into ensuring that our employees, customers and any other stakeholders were safe while trying to maintain the business activity. Also, a concern we worked from the uncertainty of the first weeks of the pandemic was to ensure business continuity would any of our employees be infected. Therefore, throughout the year we have been combining safety measures recommended by the health authorities, but also social distancing among colleagues to protect specific sets of skills and knowledge.

Digital communication tools have allowed us to continue seamlessly our office operations, although soon it became obvious that social contact was missing, and teams' bonding was being challenged. To keep the pulse of the organization and allow prompt reactions to issues before they degraded our cohesion, we implemented winningtemp. This software is a tool developed in cooperation with the Gothenburg University and powered by Artificial Intelligence. Each member of our organization answers four simple questions once a week and the system, when finding patterns, propose correlated questions trying to get more insights. We have seen already situations where it has proved useful to quickly give solutions to situations damaging our team spirit.

The measures to protect our employees worked overall and we had 5 cases in the entire Nordic organization, 3 of them

concentrated in the Swedish organization, where national health authorities' approach was more relaxed.

However, the pandemic did not succeed to divert us from our commitment to keep strengthening our environmental, social and governance positioning as well as a healthy financial performance.

Environmental sustainability:

- Inclusion in our car policies of partially or totally electrically powered vehicles.
- Challenge the need of travelling for some business activities, especially with only internal participation.
- Complete the development of our suppliers' code of conduct on 3rd party suppliers.
- Use the web browser "ecosia" which ensures tree plantation on exchange for searches.
- Develop our product portfolio on separation of pollutants from stormwater.

Social and Human rights matters:

- Incorporation to all the ACO entities in Nordics of winningtemp to follow up on employee satisfaction.
- Incorporation of our first female member to the board of directors.
- Suppliers' code of conduct also included human rights' respect commitment.

Governance:

- Formalization and harmonization of risk management.
- Reinforcement of internal controls.

- Increasing interaction between the 2 dimensions of our matrix organization, supported by the full deployment of communication technology tools.

Through the next pages we will share in details the steps we have been making in the right direction, for which we feel proud but at the same time humble, as we know there is still a long way until the human collective footprint does not endanger environmental sustainability and for that we would welcome any feedback you may want to share with us at csr-nordic@aco.local.

1.1.- About this report

All the affiliates belonging to the ACO Nordic Group A/S, as well as the holding company itself, prepare their yearly statutory reports on a basis of natural years (January 1st to December 31st). The Corporate Social Responsibility report for 2020 carries on with the commitment we started two years ago on being transparent about our vision and strategies in this area.

This sustainability report has been prepared in accordance with the GRI Standards: Core option, and will be annexed to the financial statements for ACO Nordic Group A/S for the 2020 exercise, covering the requirements of the Danish Financial Statements' Act, in terms of Corporate Social Responsibility reporting (section 99a) and gender equality (section 99b). Based on the work KPMG performed on the financial statements for ACO Nordic Group A/S for 2020, KPMG conclude that the management commentary is in accordance with the requirements

of the Danish Financial Statements Act. They did not identify any material misstatement of the management commentary. It will be possible to be downloaded from <http://www.aco.dk/om-aco/csr/> and other ACO Nordic websites.

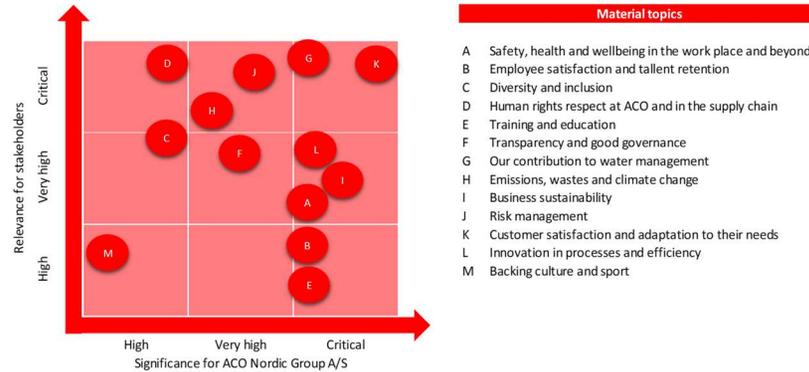
The content of this report, unless specified otherwise in the corresponding section, applies to the ACO Nordic Group A/S and the totality of its affiliates as well.

Respecting the reporting principles of the GRI 101 standard we have, first, been reflecting about our stakeholder's responsibility, creating the here enclosed map, where shareholders, employees, customers and the extended beneficiaries of the ACO solutions for surface water management and building drainage are at the core.



The content, structure and scope of this report was determined through a process of internal and external reflection, which made it possible to identify and prioritize matters with a greater impact and importance for the business and/or stakeholders.

From the overall assessment of the critical matters for each stakeholder and the most significant aspects for business activity, the top management at ACO Nordic Group A/S decided to concentrate in the list here below enclosed:



The relation between those material topics and the Danish financial authorities' requirements, as well as the corresponding GRI standards can be found in the appendix 1, table 3.

2.- ACO Nordic Group A/S organization

2.1.- ACO Nordic Group A/S background and structure

ACO Nordic Group A/S is part of the ACO Group, which was founded in 1946 by Josef-Severin Ahlmann in Büdelsdorf, in the state of Schleswig-Holstein, northern Germany.

Initially focused on building materials, since the 1960s the backbone of the company's growth turned to be designing, manufacturing, and developing drainage products and systems. The wide range of ACO Group products' portfolio has enabled us to deliver services and solutions in accordance with our customer's needs.

ACO Nordic group A/S has 100% shareholdings on several companies in Denmark, Sweden, Norway, Finland, the Baltic republics and Poland and its own shares are 100% ownership of the Ahlmann family through the ACO group holding (see table 1 in the appendix area for full legal structure). All of them have the legal form of limited liability companies. In the map here besides, the location of the different offices and factories is indicated.

the 2 factories in the north of Denmark (Hvidbjerg and Nors). On the other hand, it has managerial responsibilities in ACO Elementy Budowlane Sp. z o.o. the ACO affiliate in Poland despite not being its shareholder.

2.2.- The activities carried by the ACO Nordic Group A/S and its business model

There are approximately 360 employees working for the ACO Nordic Group A/S and its affiliates. While Hvidbjerg and Plastmo have their own production sites and they both produce and commercialize their goods in the Nordic subgroup markets, the ACO affiliates are limited to marketing and commercialization activities of goods produced by the ACO Group in other sites outside the Nordic Subgroup. The ACO affiliates in the Nordic subgroup, commercialize products manufactured mainly on ACO factories based in Germany, Czech Republic, and Poland.

Exports outside the Nordic markets are limited and mostly linked to Plastmo serving Russian and Ukrainian customers. Exports to other markets are possible but seldom, following the ACO philosophy of letting the local affiliates take care of the local market needs.

The ACO Nordic Group, provides, with the mentioned resources, not only products and services, but focuses on providing integrated solutions for the problems presented by water and the need of its adequate management in different circumstances. In most of the cases, our value chain goes through our business partners: the wholesalers, the builders' merchants and the "do-it-



The headquarters of the “Nordic subgroup” are placed in Ringsted, Denmark, which holds the managerial responsibility over all the companies owned by the ACO Nordic Group A/S, except

yourself” shops or chains of shops. Our own consultants will support the projects requiring a higher profile of knowhow, helping on the design of the solution, training on the use and management of the products and following up from the inception to the building phase the construction project.



During the construction project management where we participate, we may be interfacing with construction companies, installers, engineers, architects or even the sponsoring actors as part of the decision-making process on the project. However, is our policy to prioritize physical and financial flows through the mentioned business partners (re. section 2.5 on risk management).

2.3.- The ACO Nordic group A/S offer portfolio

The product portfolio is structured around the system chain to manage the water.



In outdoors environments from the moment in which the rain reaches the ground or the roofs of urbanized areas, where is collected with our extensive range of drainage products, until its release into the sewage system with our pump stations or water flow regulation solutions. Our portfolio also contains products and services to help on the cleaning of the water from oil, grease, sediments, heavy metals and other pollutants before reaching the sewage system as well as customized solutions to prevent water floods, especially in urban areas, where the scarcity of green areas limit the natural absorption of the rainwater.

Indoors, we apply the same philosophy and still have in our portfolio products and services to cover the needs of the collection, cleaning and releasing of water in environments as exigent as the food processing industry or commercial kitchens, where hygiene is prioritized to protect final consumers' health.

Our product range is commercialized in the Nordic subgroup under the brands ACO, Plastmo and Hvidbjerg. ACO products are mostly dedicated to the Surface Water Management and to the Building Drainage segments; Plastmo products are mostly focused to manage the rain from the sky to the ground around the

house (rain gutters, roofing materials, water infiltration solutions, rain flow regulation for the garden, rainwater storage and recycling, etc); while Hvidbjerg is mainly focused into windows.

In order to ensure a responsible life cycle management on the products using PVC in our Plastmo portfolio, the ACO Nordic Group A/S owns, as well, 20% shares on Wuppi A/S, a Danish company which business model is to recover and recycle PVC.

More details on our offered portfolio can be found in our local websites or on the ACO group one:

<https://www.aco.com/en/products-and-services/>

In our cooperation with our business partners and customers, we also provide useful services that help the process of managing complex construction projects where multiple parts have to be coordinated (wholesalers, entrepreneurs, constructors, installers, engineers, architects, etc).



The extensive portfolio of products and services offered, allow us to be present in the construction of residential and non-residential buildings as well as in civil engineering projects, both new and renovating constructions.

2.4.- Major structural changes during 2020 for the ACO Nordic Group A/S

During 2020, there were no changes on the scope of this document in terms of Mergers or Acquisitions. Liquidation of Plastmo Polska Sp. z o.o. was prolonged due to the COVID-19 restrictions and it was not finished until March 2021.

2.5.- Risk management and business sustainability

The ACO Nordic Group, as one of the actors in the construction market, has identified and reacted in different ways to the risks here below mentioned. We understand risk is inherent to business; therefore, our approach is that risk avoidance is not always the optimal answer and to ensure the business sustainability on a long run requires a deep understanding of the nature of the risk, its probability, and the potential impacts in terms of economic performance, social repercussions, and environmental consequences. From that point of view, we have reached the following conclusions:

Credit risk: as part of the economic cycles, the construction sector suffers during its valley periods of recurrent bankruptcies of construction companies, which put in danger the profitability and business continuity of all other upstream contributors (wholesalers and producers). In that sense, ACO Nordic Group has adopted a policy of ensuring the credit risk, despite a rather positive history and a business environment in most of the markets in which we operate which are both, healthy in the levels of indebtedness and have good records on debt repayment.

Currency exchange risk: The ACO Nordic Group A/S consolidates its financial statements in Danish Kroner and is therefore exposed to the fluctuations of any other currencies bringing cash inflows (Swedish and Norwegian Kroner and Polish Zloty) or outflows (mainly Eurozone suppliers). In that sense, the ACO Nordic Group A/S has a centralized policy to hedge the currency exchange risk against fluctuations in SEK, NOK and PLN. The DKK remains pegged to the EUR with fluctuation bands of +/- 2.25% around a central exchange of 7.46038 DKK/EUR, for which we have decided not to hedge the risk on EUR currency.

Liquidity risk: ACO Nordic Group has a consolidated equity ratio of 58% which is considered very healthy and count currently with credit facilities granted mainly through our Nordic banking partners: Danske Bank and Nordea. Our operations in Poland are also supported through Mbank, affiliate of Commerzbank.

Market risk: As mentioned before, the construction market has very pro-cyclical characteristics, with profound impacts on the activity level, forcing all the competitors to be reactive in terms of pricing, organizational structure and having always to ensure maximal operational efficiency. In this sense, the ACO Nordic

Group has been working during the recent, positive market conjuncture, years to modernize our IT systems and be as close as possible to our customer needs, in order to sense, as soon as possible, changes on market trends.

Operational risks: We know that human intervention is prone to mistakes, so we continuously work on the balancing the efficiency on the operations with the limitation of the risk of misstatements and fraud. The target is not only linked to the financial statements, but more generally to the execution of the operations carried in by the ACO Nordic Group A/S and its affiliates.

Business sustainability: In order to create and maintain a sustainable business we have adapted a careful policy in which we focus our business development and expansion strategy on our core business – defined in our International ONE21 business plan.



Malmö (Sweden) drainage solution designed by Elke Kruse

Our core business is defined with our three business legs: Surface Water Management SWM, Building Drainage BD and Building Material BM. Further, a large portfolio of our products has to do with the areas “HOLD” and “RELEASE”, those product groups are among others meant to be collecting rainwater, storing it for later usage in other areas, which is indeed a sustainable approach to collecting rainwater.

ACO Nordic Group A/S as part of the ACO Group, contributes this way to a better environment with its portfolio focused on water management and proudly can say that has not face any complain of any kind about our environmental non-compliance with the applicable laws and regulations.

During 2020 we completed with success an internal formalization process of our risk management, assigning responsibilities, and restructuring it on 5 areas: Strategic, Financial, Operational, Compliance and Public Relations on which we collect affiliates' feedback altogether with the main forecasting exercises.

2.6.- Governing bodies

The ACO Nordic Group A/S has a very flat managerial structure, where the executive committee is composed by the CEO and the CFO of the group.

The activity performed by the executive committee is supervised by the supervisory board, composed by:

- Hans Julius Ahlmann; Chairman and Shareholder.
- Hans Peter Meyer; Member of the ACO Severin Ahlmann GmbH and Co. KG advisory board.
- Jens Uwe Paasch; CFO of the ACO Severin Ahlmann GmbH and Co. KG.
- Lene Bryde; CEO of ACO Funki A/S
- Thomas Heldgaard, Global SWM Director.

The supervisory board calls the executive committee between 2 and 4 times per year on business reviews to treat the most significant topics and they do not perceive any remuneration for this work.

It is the function of the supervisory board to provide strategic guidance and validate the goals settled for the short, middle, and long terms. Further guidance on the company values, mission and vision is also provided by the supervisory board, being the highest governance body the ACO Nordic Group A/S.

Respectively, it is the function of the executive board to communicate the supervisory board the current status of the business, its performance, the outlook on its future evolution and of course, any concern they might understand as critical.

In the same way, the members of the executive committee in ACO Nordic Group A/S act as supervisory board for all the affiliate companies, where the local management present on their turn between 2 and 4 times a year their activities and outlooks on the business performance. As well, no remuneration is provided in this case.

On a daily basis the decisions are taken by the ACO Nordic Group A/S affiliates' local management following the delegation of

authority documents shared with each of them on a formalized basis since 2016, limiting their actions in terms of investments, onboarding and laying off employees, customers and suppliers' negotiations, banking relations and other topics. It is the prerogative of the local management to extend the application of the delegation of authority procedure to their employees.

3.- Transparency and good governance

3.1.- Management approach and actions undertaken during 2020

It is the responsibility of the ACO Nordic Group A/S to provide a clear guidance to all its affiliates and employees on how to make business on a lawful and ethical way, as well as create and operate a governance structure that supports the mentioned guidance.

Following the Transparency International assessment by country on the corruption perception index 2020 (last available up to the date of publication of this report), we know that in the Nordic markets, we operate on, are a relatively safe environment, which historically has allowed us to keep the ethical topic on the level of top management exemplarity.



ACO training facilities in Rendsburg (Germany)

However, we are conscious that there is always a certain risk linked to individual behavior and the best protection against its consequences is to have a strong company culture and processing structure that guides individuals on the right path. In order to limit that individual behavior risk, during 2018 and in line with the ONE21 objective to adopt global approaches in several areas, we implemented at the ACO Nordic Group A/S and its affiliates a Code of Ethics aligned with the ACO Group. The target being, to formalize and document guidelines in subjects as diverse as general business behavior, anti-corruption, conflict of interests' management, data protection, working health and safety, protection of the environment, etc.

Each manager and employee of the Nordic subgroup and its affiliates has been requested to read and subscribe the code of

ethics. To ensure full understanding, we have been granting translation to local languages where it was required.

During 2020, we succeeded to implement our supplier code of conduct also upon our main third-party suppliers. This code will ensure that the values we demand to ourselves in the ACO Nordic Group A/S are also respected upstream in the supply chain, to let us guarantee to our customers and any other stakeholder, that we conduct business on the most respectful and transparent way.

The values of the company, remain, represented in the following three sentences, which we know as our ACO DNA:

ACO. creating the future of drainage

ACO. committed to excellence with passion

ACO. a strong family you can build on

We keep leaning on our internal controls system Impero to ensure that our business processes are at the same time flexible to adapt to our customers' needs, but also safe, limiting both: mistakes and potential fraud.

3.2.- Conflict of interests

The Code of Ethics, underwritten by each employee of the ACO Nordic Group A/S, and its affiliates, includes a specific appendix on the subject of conflict of interest. The company requests from every employee to communicate, without having to issue any additional request, to their local board of directors, any kind of

conflict of interest they might be facing, either at their recruitment or supervening subsequently.

The local management board should take a decision respect the reported conflict of interest and communicate their decision to the ACO Nordic Group A/S executive committee.

3.3.- Transparency hotline and results during 2020

The grievance mechanism for any concern on the business ethics' topic is contemplated in our Code of Ethics itself. The ACO Nordic Group A/S top management will receive through the e-mail address ethics.nordic-line@aco.com the details about the mentioned concern, with the firm commitment to analyze each and every communication received in that address, granting the anonymity of the whistle blower and refraining from any retaliation when acted in good faith.

To date, no ethical concern was reported through the mentioned e-mail address or any other mean to the ACO Nordic Group A/S executive committee.

At the same time, no legal action has been undertaken against ACO Nordic Group A/S or any of its affiliates or employees concerning anti-competitive behavior, anti-trust or monopolistic practices or non-compliance with laws and regulations in the social and economic area.

4.- Social and employee matters

4.1.- Management approach and actions undertaken during 2020

The management, at all levels in the organization, has, from the implementation of the Code of Ethics, a written reference of behavior on what respects employees and other colleague's treatment. The Nordic culture, where the management empowers the employees through **trust**, has been the inspiration of our Code of Ethics, as opposed to cultures where the employee has to earn the trust. We believe this model provides open channels for communication and mutual beneficial relations from the first day of professional cooperation.

Furthermore, the Nordic subgroup is settled on a macroeconomic environment with low unemployment rates in most of the markets where we operate. Therefore, we understand that attracting and retaining the talent that we need to achieve our objectives is not only about contractual economic conditions, but also about a good fit into our culture and a management style that fosters creativity, controlled risk assumption and high levels of satisfaction linked to both, personal, team and at a larger extent, Nordic performance.

During 2020 we have proceeded to the roll-out of the application Winningtemp in all the ACO affiliates, which intends to monitor the employee's satisfaction with their jobs, their managers, their colleagues, and the company in general. The application is

provided by the company Winningtemp AB and the Artificial Intelligence powering it, proposes to each employee, on a weekly basis, different questions depending on the former week answers.

The tool it has proven extremely useful during the COVID-19 pandemic, where most of the employees have had to work remotely on a home-office base. During that time, the management got a way to keep an overview on the impact of the pandemic restrictions on the employees' motivation and so, be able to have ad-hoc discussions and re-energize the organization.

4.2.- Safety, health and wellbeing in the workplace and beyond

The ACO Nordic Group A/S and its affiliates comply with all applicable legislations and regulations in this matter. There are three production sites on the scope: a) 2 belonging to Hvidbjerg Vinduet A/S, both in Hvidbjerg itself and Nors (Denmark) and b) 1 belonging to Plastmo A/S, based in Ringsted (Denmark). Each of those sites have their own safety program. More details about their particular programs, risk management and others, are made available in each affiliate.



The yearly statistics on occupational accidents, show a situation that is not worrying, however our approach to mitigation of risks and hazards for the wellbeing of our employees and any other business partner working with our products is to anticipate and prevent, going beyond the applicable standards. As part of our approach, we also analyze the events that have happened in the past and adapt our internal policies to avoid that anything similar happens again.

Also, to be highlighted as a sign of good governance in this area is that the Danish affiliates, both ACO, Plastmo and Hvidbjerg, have been awarded with the “green smile” certification during the last inspections carried by “Arbejds Tilsynet”.

	In the job injuries		Total absence due to injuries or sickness (days)
	Light	Severe	
ACO Denmark	-	-	120
ACO Sweden	-	-	245
ACO Finland	-	-	-
ACO Norway	-	-	126
Division ACO	-	-	491
Plastmo Denmark	-	-	798
Plastmo Norway	-	-	2
Plastmo Poland	-	-	-
Plastmo Railing	-	-	124
Division Plastmo	-	-	924
ACO Lithuania	-	-	-
ACO Latvia	-	-	-
ACO Estonia	-	-	7
Division Baltic	-	-	7
Nordic Group	-	-	-
ACO Servicepartner	-	-	-
TOTAL NORDIC SUBGROUP	-	-	1.422
Hvidbjerg	-	-	7
TOTAL "ACO NORDIC GROUP A/S"	-	-	1.429

4.3.- Employee satisfaction and talent retention

As mentioned, all ACO entities in the ACO Nordic Group have started to use Winningtemp software as a weekly frequency employee satisfaction survey.

For the time being the other affiliates have kept using their yearly satisfaction surveys, although seeing the positive impact and acceptance in the ACO affiliates, we foresee that 2021 will be the year where this software is generalized to all affiliates.

Furthermore, we understand that a transparent communication with the employees is a big component of their satisfaction, moreover, when it comes to communication with their hierarchical responsible. That is why, in the ACO Nordic Group A/S, we try to share information, on a regular basis, so all the employees are aware of the latest news on the organization, performance compared to budgets and forecasts, etc. Some examples, in that line, are the monthly meetings that Plastmo has in the canteen with all their employees, the Nordic finance and IT meetings where all the employees of those departments get to know all the last developments on what regards IT projects, finance performance and organizational changes, etc.

There is no standard policy on what regards how much anticipation we should give to the employees on big restructuring operations.

Finally, on what regards rights of association, all the entities on the scope of this report, respects, of course, the legislation about employees' right of association and collective bargaining. Also, during the implementation of the suppliers' code of conduct we are requiring to our upstream business partners to be also respectful in this area and grant to their employees this right, according to their corresponding local regulations.

4.4.- Diversity and inclusion

ACO Nordic Group A/S, as mentioned already, is aware of the high level of competition for highly qualified talent needed to achieve our common targets. Therefore, it has a fringe benefits

policy (health insurance, regular health checks, pension plan, disability insurance, variable remuneration, etc) that is not just according to the applicable legislation, but, on the competitive side of the market habits.

We offer the same opportunities, treatment, remuneration and benefits to all our employees and we give equal chances to candidates that wish to join forces with us, prioritizing intellectual skills and emotional capabilities over gender, age, race, nationality, or any other characteristic that could limit us from always getting the best candidate to fit in our requirements.

We understand diversity as a way to ensure richness of points of view when it comes to decision making, therefore we also understand that on what concerns the governing bodies the female gender is underrepresented.

The highest governing body

- Our supervisory board has got renewed during 2020, having our shareholder back to the chairman position and providing one, out of the four other members of the board places to Lene Bryde, CEO of the sister company ACO Funki A/S.

The other management levels

To ensure that we make the right steps towards a fair female gender representation, on the other management levels, to achieve as well at least 1/3 of female representation, we make sure that in our recruitment processes:

- The job advertisements for opened positions are gender neutral.

- Our headhunting partners try to bring relevant female candidates to the last phases of the recruitments.
- We offer compensation packages that are competitive for the corresponding labor market conditions, regardless gender.

Up to 2017 that highest level of decision making (below the Board) was limited to the CEO and the CFO of the group, both of male gender, therefore not having achieved the mentioned target. In 2018, we incorporated to the group an HR Director in Poland, with Nordic responsibilities, to reinforce the areas of top talent recruitment, motivation, and retention.

We are glad to mention that Bogumila Gelbach (of female gender) is contributing already very positively to reinforce adequate set and implementation of HR policies.

It is also company's policy to ensure at least 1/3 of female presence at the other management levels of the ACO Nordic Group A/S and its affiliates (understood as the MD and the next level of mid-management, in case of existing or for small affiliates the Managing Director and the Finance Manager).

In 2020 10 out of the 12 affiliates had a satisfactory balance (between 1/3 and 1/2 of female presence and we will keep working to reach this proportion in all of them.

The ACO Nordic Group A/S can say proudly that we have never faced any complain in any of our affiliates on what concerns respect to diversity and equal level of opportunities and we ensure through our Code of Ethics that all employees understand how important is for us this subject.

Furthermore, it is also our understanding that good financial performance is a basic requirement to catch the attention of candidates who are looking not only for an interesting place to deploy their skills and knowhow, but also to belong to a winning team.

Therefore, we foster cooperation inside the ACO Nordic subgroup, but also healthy levels of competition, ensuring that we celebrate the successes we get, never mind the size.



Latvian ACO team on their Riga premises

For statistics in the subject, please refer to the Table 4 at the end of this document.

4.5.- Training and education

Investing in our employees to perform better their duties is a must if we want to supply them with the necessary tools to achieve their targets inside the organization. The focus is currently on developing a common CRM system and train the sales organization on using it at its best. Other investments into employees' skills have been traditionally analyzed and approved by the hierarchy in the absence of human resources interlocutors.

Currently only the employees having assigned a variable remuneration, follow a regular interview with their hierarchical responsible about performance achieved, targets for the next financial exercises and career development opportunities. That comprises not only sales representatives and top management, but also a part of the back-office employees.

5. Human rights respect at ACO and our supply chain

5.1.- Management approach and actions undertaken during 2020

Working in a Nordic environment, and after what it has been exposed in the section 4 of this document, human rights respect might seem out of question. Reviewing the supply chain, we have, which mainly brings up goods from EU countries and from intercompany transactions, we might think as well that risks in this area are very limited.

Those risks could be the potential use of forced or child workforce, and despite the low level of risk perceived, since 2018 we have taken specific steps in order to document our commitment with a total respect of human rights, both, in the Nordic subgroup, and in our supply chain. First through our own code of ethics, to ensure compliance not just with the basic Universal Declaration of Human Rights proclaimed by the UN in its assembly in Paris on the 10th of December 1948, but going beyond on ensuring respect and equal level of chances for every colleague (more details in the article 2 of our Code of Ethics). Then through our suppliers' code of conduct to ensure that our final products offered to the market are absolutely respecting the mentioned human rights' principles.

The suppliers' code of conduct was agreed internally during 2018 and has been accepted by all our intercompany suppliers in 2019 and our main third party ones during 2020, being our objective to maintain the focus in the topic in the future and challenge, in that sense, any new partner willing to do business with us.

5.2.- Child and forced or compulsory labor risk

We have been analyzing the structure by country of our supply chain and we believe that there is little or no chance of either child or forced labor in any of our supply partners.

Here below enclosed the structure of our purchases by country and split between group or 3rd party purchases, but in percentage and value:

figures in m€

	Group	3rd Part
Germany	13,6	3,1
Denmark	4,8	10,8
Czech Republic	4,6	-
Poland	1,0	3,6
UK	0,2	3,8
Israel	-	0,3
Others	2,6	5,9
TOTAL	26,8	27,6

figures in %

	Group	3rd Part
Germany	50,8%	11,2%
Denmark	17,9%	39,4%
Czech Republic	17,1%	0,0%
Poland	3,8%	13,1%
UK	0,6%	13,9%
Israel	0,0%	1,0%
Others	9,8%	21,4%
TOTAL	100,0%	100,0%

As all the intercompany suppliers and most of the 3rd party ones have committed to our supplier code of conduct, we understand that every upstream player on our supply chains is aware of this risk and tries to make sure, for their own benefit, that nobody is involved on child or forced labor.

6. Environmental protection including climate

6.1.- Management approach and actions undertaken during 2020

Our business model is directly focused on one of the 17 Global Goals identified by the United Nations in 2015 to ensure a better world by 2030.



Named the goal 6, “Clean water and sanitation”, it has different meanings in the developed and the developing countries (for more details on this goal, please read <https://www.globalgoals.org/6-clean-water-and-sanitation>).

The general risks associated to this topic, also applicable to us, are:

- The excessive consumption of limited resources, including, but not limited to, energy and clean water (analyzed later in the section 6.3).
- The contribution to green-house effect emissions.
- The wrongful management of wastes, and lack of planning on the product lifecycle which could damage the natural ecosystem (see section 2.3. on our contribution to Wuppy shareholding to manage PVC recycling)

6.2.- Our contribution to water management

6.2.1.- Collecting water with Seal-In technology

However, the ACO portfolio, as detailed in the section 2.3 of this document, counts with an extensive set of products to ensure the collection of water in different environments, both outdoors and indoors. It can clean the water from oil, grease, heavy metals, and other pollutants, and therefore contribute to the effort to manage efficiently a scarce resource as it is clean water.



Click to play the video on the "Seal In" technology (German)

The "Seal in" technology in our channels, is exclusive in the drainage market, and ensures the collection of rainwater without any leakage, which is so important for the protection of our environment from the pollutants carried by it.

6.2.2.- Cleaning stormwater

Our wide range of separators, ensure that once the rainwater is properly collected from a diverse and challenging scope of situations (pedestrian areas, highways, parking lots, petrol stations, etc) is then treated in the adequate way before being released in the sewage system:

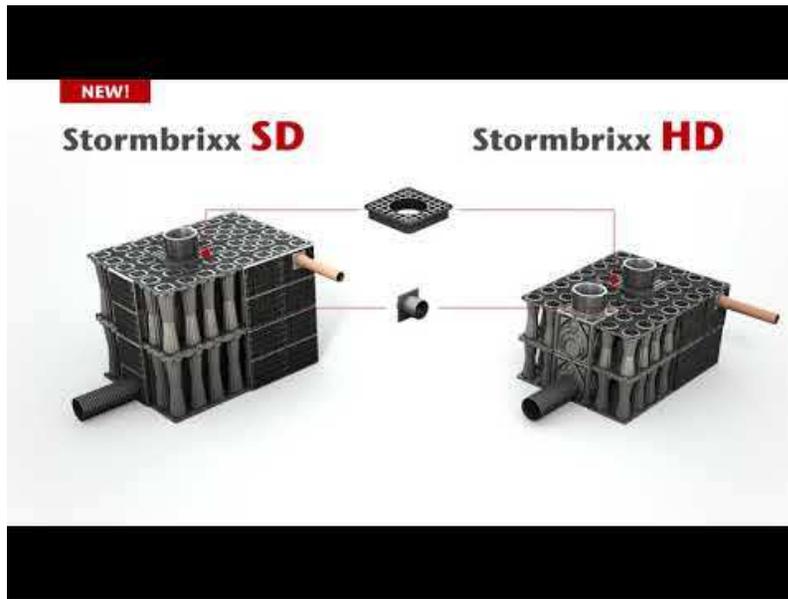


Click to play the video on rain water cleaning (English)

6.2.3.- Holding stormwater

Rainwater management is not only about how to get it clean into the sewage system. Unfortunately, global warming and climate change is increasing the frequency of heavily flooding rain events, especially in intensively urbanized areas where the water, does not have a natural way to be absorbed by the water table.

In the video here below enclosed the entire chain of water management, included “Stormbrixx” is explained. We can also see on it explained the release side of the chain, where we count with products helping the flow control or the lifting of water depending on the requirements of each application:



Click to play the video on Storm water management with Stormbrixx (English)

ACO has included in its portfolio “Stormbrixx”, a product that helps on the infiltration, attenuation, and retention of the rainwater with 2 versions SD (designed for car traffic) and HD (able to afford any kind of traffic, including the heavy one).

6.3.- Protecting natural habitats from human interaction

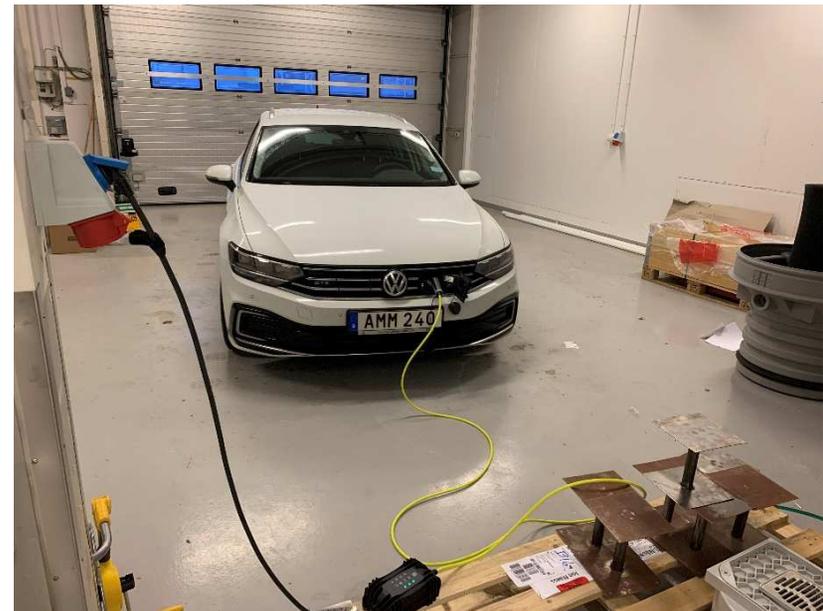
In our extensive portfolio we count with products as diverse as ACO Wildlife, a system composed by a barrier to avoid that amphibians and small animals do not get into the highways and a tunnel allowing them to cross safely from one side to another.

6.4.- Emissions, wastes and climate change

During 2020, we have changed our car policies around Nordic to incorporate and support as the preferred solution to provide Electric Vehicles or Hybrid Vehicles to the employees entitled to have a company car. We expect that on the 3 years lifecycle renovation of our leased car fleet we will see a significant progress towards cars more environmentally friendly.



1,3km project in Nacka municipality, Sweden



First plug-in hybrid car in our Swedish car fleet

The production facilities in ACO Nordic Group A/S are very limited. As mentioned already in the introductory section 2. PVC productions are set up for the Plastmo Group in Denmark and Poland and, as also mentioned, in Denmark, we cooperate

through a 20% ownership with Wuppy, a company which recycles this material at the end of the life of our products.

Also in Denmark, the ACO Nordic Group A/S count with production facilities elaborating windows mainly in PVC, aluminum and a combination of wood and aluminum.

Our suppliers' base is very stable, and we have not had any change on it during the year 2020. No environmental issue has come to our attention from any of them, however, once agreed with them the suppliers' code of conduct, we will evaluate the possibility of establishing a due diligence program to scrutinize not only the candidates to become new suppliers, but also the existing ones.

As a group, ACO is continually challenging its own portfolio and reengineering it to make it more environmentally friendly. An example is the recently developed [Q-max neo](#) a slot drainage solution specially indicated for heavy-duty projects as airports. The current solution is made of several partial bodies, which can be packed and transported on a more efficient way, saving, therefore, costs and greenhouse gasses' emissions.

We have collected data around water and electricity consumption, as exposed here below, although we need, both, to make it comparable with similar production sites and to establish targets of efficiency on its use.

	Resource consumption			
	Water consumption in m3 / year			Electricity consumption in kwh / year
	Withdraw	Consumed	Discharged	
ACO Denmark	98			4.000
ACO Sweden	0	0	0	9.000
ACO Finland				
ACO Norway				
Division ACO				
Plastmo Denmark	2.951			900.561
Plastmo Norway				19.800
Plastmo Poland	-	-	-	-
Plastmo Railing				243.931
Division Plastmo				
ACO Lithuania	73			7.000
ACO Latvia	114			42.480
ACO Estonia	-	-	-	-
Division Baltic				
Nordic Group	589			45.975
ACO Servicepartner				
TOTAL NORDIC SUBGROUP				
Hvidbjerg	459			1.144.000
TOTAL "ACO NORDIC GROUP A/S"				

7.- Customer satisfaction and adaptation to their needs

7.1.- Management approach and actions undertaken during 2020

The ACO Nordic subgroup has a continuous and open dialog with its direct customers, in most of the cases the wholesalers of the sector, but also with all the actors involved in the construction sector, where contractors, subcontractors, architects, engineers, installers, designers, owners and other partners participate in the process.

We believe that being present and advising all of them, grant us a position of respectable partner with deep knowhow on water management, both for civil engineering projects, but also, on the building construction. In line with our DNA statement, it is our target to build an image of reliable long-term partner, committed to deliver excellence with passion.

We use each and every opportunity to approach our partners to request feedback and to get closer to their needs, which at the end help us developing a business model that continuously adapts to the market requirements. In that sense, during the COVID-19 pandemic, we have embraced online events as the best way to stay close to our customers, protecting their and our health.



<https://www.beyond.aco/> online seminar for architects

7.2.- Customer health and safety

Our products are designed not only to fit with the needs of the construction sector in terms of water management and other applications for our extensive portfolio. We design our products, also for the best functionality, cost effectiveness and visually appealing finishing, and we take care, as well, that the people involved on its handling during the transport, installation, maintenance, and daily usage, can do it without risk for their health and safety.

Also, people not related directly with our business, are exposed, daily, maybe without noticing it, to our products. We are present with our large range of external line drainage products in airports, harbors, commercial streets, stadiums, and others. The ACO employees grant that for each application we get the right product installed in the correct way, so when supporting different level of pressures and forces the product resist the pass of time without being deteriorated and putting at stake the safety of those exposed to them.

During the year 2020 the Nordic subgroup has not faced any claim in this regard, and we keep working on ensuring not only the quality of our products, but also its right application for a long-lasting performance.

There are areas of our industry, where we are proud to contribute with innovative solutions to challenges that were putting at risk human lives. The next two chapters are dedicated to two of those challenges we have solved.

7.2.1.- Hygiene First

The food processing industry and the commercial kitchens have been facing several cases of listeria infections, which is one of the most virulent foodborne pathogenic bacteria, getting on 20 to 30% of the cases fatal for the humans infected. Following the data gathered by the European Center for Disease Prevention and Control on its last available report, the average rate of human listeriosis was 0.5 cases for 100.000 inhabitants, being more than tripled (1.6 cases) among children under 1 year old and elderly above 65 years old.

As our Nordic Managing Director, Soren Olsen, was mentioning in the here above video, this issue is affecting not just underdeveloped countries, but is something we have unfortunately seen also in the Nordic environment.

ACO drainage and grease separation systems are designed around the three most important topics for the food service industry: food safety, cost management and health & safety. We design our products to drain processed wastewater hygienically and economically, exceeding the high standards established by the European Hygienic Engineering and Design Group (EHEDG).



Click to play the video: Soren Olsen on Hygiene First



Click to play the video on Hygiene First (English)

7.2.2.- Tunnels

Another situation where ACO products have succeeded to excel and make a competitive advantage out of a circumstantial challenge is our solutions for tunnels. There, the danger of having vehicles carrying inflammable substances and having an accident can be minimized using our solution as explained in the video here below, designed specifically for the Norwegian market, where many tunnels are currently under construction to cope with the difficult geography of the country, especially in the west coast.



Click to play the video explaining ACO tunnel functioning (Norwegian)

7.3.- Customer privacy

As part of our policy to focus on customer care, we put their privacy first. Enjoying the enforcement of the European Regulation 2016/679 on personal data protection at the end of May 2018, we have strengthened our internal processes around the subject to ensure that not only we have not gotten any claim or complain so far, but that no question rises in the future about our commitment in this topic.

8.- Innovation in processes and efficiency to ensure competitiveness

8.1.- Management approach and actions undertaken during 2020

It is ACO Nordic subgroup's management understanding that improving our own internal processes help us to free resources to focus on what is our core competences around water management and support our business partners in the construction sector.

From 2016 until 2019 we were working on strengthening and harmonizing our ERPs. Once we succeeded to enroll Poland, the last remaining affiliate, we have started working on a harmonization of our CRM and BI tools. Those projects were frozen due to precautionary financial measures taken during the first COVID-19 wave, but investments have been restarted again and we are about rolling out the CRM project in the first affiliates,

targeting to conclude this endeavor by 2022. Also, the harmonization of our financial and operational intelligence under a common BI is a project that is advancing in parallel and we have the aim to conclude all its phases in the same time scope.

Other efforts to promote balanced processes between efficiency and safety are also mentioned in the section 2.5 about Risk Management.

9.- Supporting culture and sport

9.1.- Management approach and actions undertaken during 2020

Is at the heart of the ACO Group to contribute and support culture and sport. The ACO Group organizes events like the NordArt (the largest Art exhibition in northern Europe), which unfortunately did not have place during 2020, due to the pandemic restrictions. Also most of the other sports' and art support regular events were cancelled (the Schleswig-Holstein Music Festival, the Imland-Lauf race in Rendsburg, and the Musto Skiff sailing competitions). More information about this subject is available in our website: <https://www.aco.com/en/about-the-aco-group/commitment/>

The Nordic subgroup participates and gives the chance to the interested employees to join some of those events, as the mentioned Imland-Lauf and the NordArt exhibition.



Sculpture exhibited at NordArt 2019 in Rendsburg's ACO premises



Imland Lauf race supporting the Multiple Sclerosis facilities (2019)



Plastmo team during the Ringsted music festival (2019)

We also have our own sports events, where on a country-by-country basis the company supports the employees willing to participate on sports events. Danish entities use to participate in the relay running organized by DHL in the last week of August; we sponsor the Ringsted floorball tournament and other events are organized also in Poland, Sweden, Lithuania, etc. The company support usually consists of branded sports material to participate in the event, transportation and food and beverages.

On the cultural side, the Nordic subgroup is also very active with the hosting and sponsoring of the Ringsted music festival, every year.

As mentioned, all those events were not taking place during 2020 due to the pandemic restrictions, however, we are still committed with them and we believe those contributions to the society help us expressing our own company culture and make individual employees to be proud of belonging to the ACO family.

Appendix 1.- Data annexes and tables

In this section, as well as in some other parts of this document, the reader will find some data we have collected about the ACO Nordic Group A/S activity, putting it in perspective, when possible, with comparable data in the market. However, as this is our first CSR reporting, some data might be missing for different reasons. Would you be particularly interested in some additional disclosure, please contact us at csr-nordic@aco.local .

Table 1.- Legal ownership chart

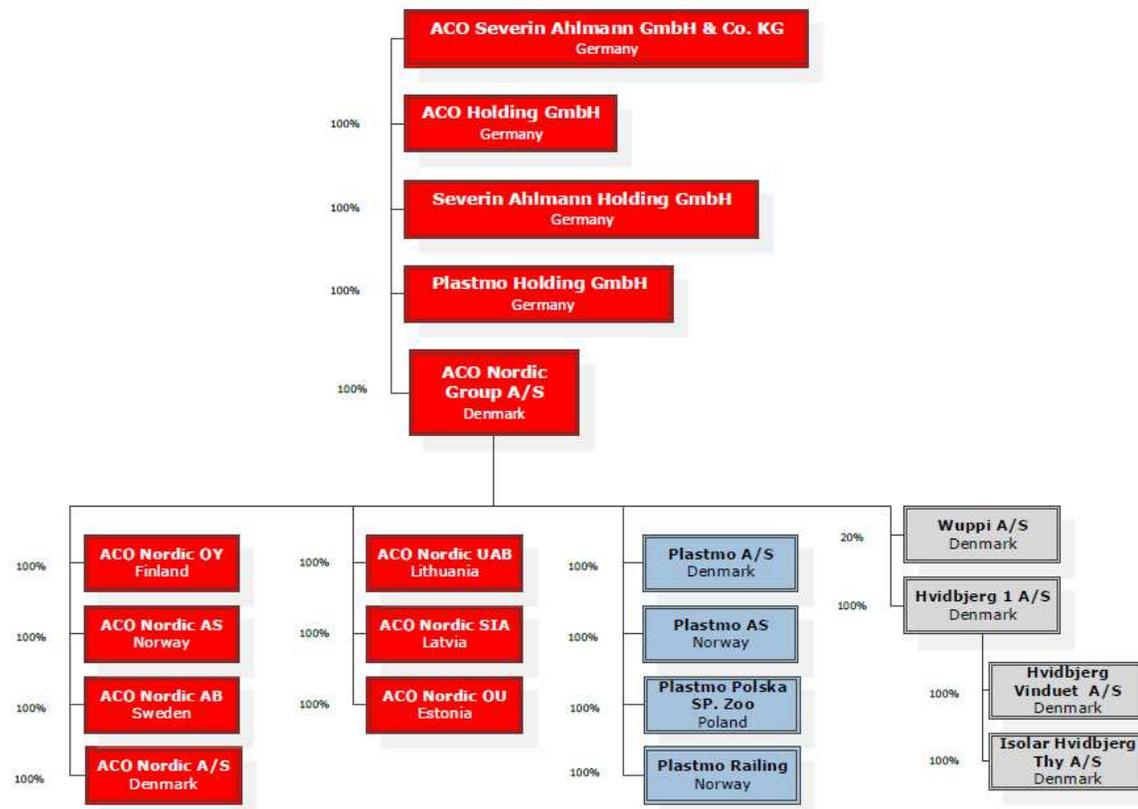


Table 2.- Data on organizational scale and location

<i>figures in t€</i>	Third Party Gross Sales	Employees	Equity	Assets	Equity / Assets	Operations	Location
ACO Denmark	7.065	15	1.050	3.177	33,1%	ACO Nordic A/S (sales office)	Thorsvej 9; Ringsted 4100 (Denmark)
ACO Sweden	13.289	25	1.559	4.090	38,1%	ACO Nordic AB (sales office)	Industrivägen 4; Sävedalen 43361
ACO Finland	4.667	7	781	1.705	45,8%	ACO Nordic OY (sales office)	Metsänneidonkuja 12; Espoo 02130
ACO Norway	3.459	7	366	1.502	24,3%	ACO Nordic AS (sales office)	Billingsstadsletta 30NO-1396 Billingsstad
Division ACO	28.479	54	3.756	10.475	35,9%		
Plastmo Denmark	28.800	60	5.395	11.159	48,3%	Plastmo A/S (Production, logistics and sales site)	Odinsvej 9-11; Ringsted 4100
Plastmo Norway	9.575	9	410	2.503	16,4%	Plastmo AS (Sales office)	Eternitveien 30; Slemmestad 3470
Plastmo Poland	0	0	151	151	99,8%	Plastmo Polska Sp. Z o.o. (Production, logistics and sales site)	Fabryczna 5; Legionowo 05-119
Plastmo Railing	1.267	7	304	1.513	20,1%	Plastmo Railing AS (Production, logistics and sales site)	Arnatveitvegen 137; Arnatveit 5262
Division Plastmo	39.641	76	6.259	15.326	40,8%		
ACO Lithuania	5.249	9	941	1.493	63,0%	ACO Nordic UAB (sales office)	Lukiškių g. 5; Vilnius 01108
ACO Latvia	1.944	9	1.017	1.502	67,7%	ACO Nordic SIA (sales office and logistic center)	Dzelzavas iela 120, Vidzemes priekšpilsēta; Rīga, LV-1021
ACO Estonia	1.416	4	718	951	75,5%	ACO Nordic OU (sales office)	Akadeemia tee 39; Tallinn 12618
Division Baltic	8.610	22	2.675	3.946	67,8%		
TOTAL NORDIC SUBGROUP	76.730	164	36.534	62.252	58,7%		
Hvidbjerg	27.471	173	9.954	15.278	65,2%	Hvidbjerg 1 A/S (Production, logistics and sales site)	Industrivej 18; 7600 Struer
TOTAL "ACO NORDIC GROUP A/S"	104.201	337	46.488	77.530	60,0%		

Table 3.- Material topics and GRI standards' mapping

Material topics	Danish requirements alignment	GRI standards alignment
A Safety, health and wellbeing in the work place and beyond	Social and employee matters	403
B Employee satisfaction and talent retention	Social and employee matters	401, 402, 407
C Diversity and inclusion	Social and employee matters	405, 406
D Human rights respect at ACO and in the supply chain	Human Rights	408, 409
E Training and education	Social and employee matters	404
F Transparency and good governance	Anti-corruption and bribery	205, 206, 418, 419
G Our contribution to water management	Environmental protection, including climate	303
H Emissions, wastes and climate change	Environmental protection, including climate	306, 308
I Business sustainability	Other impacts.	307
J Risk management	Other impacts.	
K Customer satisfaction and adaptation to their needs	Other impacts.	416, 418
L Innovation in processes and efficiency	Other impacts.	
M Backing culture and sport	Other impacts.	

Tables 4.- Employees' statistics

	Total employees												TOTAL
	Fixed full time contract						Temporary, part time, trainee and other						
	Male			Female			Male			Female			
	A	B	C	A	B	C	A	B	C	A	B	C	
ACO Denmark		10	1		2	2			1		1		17
ACO Sweden	1	12	7	7									27
ACO Finland	1	1	4			2	1						9
ACO Norway		6			2								8
Division ACO	2	29	12	7	4	4	1	-	1	-	1	-	61
Plastmo Denmark	4	16	21	2	5	4		2	1	2	1	2	60
Plastmo Norway		4	2		2	1					1	1	11
Plastmo Poland													-
Plastmo Railing		5	2		2	1	1		1		1		13
Divison Plastmo	4	25	25	2	9	6	1	2	2	2	3	3	84
ACO Lithuania		4			4								8
ACO Latvia	1	3	1	1	1			1					8
ACO Estonia	-	2	-	2	-	-	-	-	-	-	-	-	4
Division Baltic	1	9	1	3	5	-	-	1	-	-	-	-	20
Nordic Group		9			2						1		12
ACO Servicepartner													-
TOTAL NORDIC SUBGROUP	7	72	38	12	20	10	2	3	3	2	5	3	177
Hvidbjerg	20	46	58	2	12	23	5	-	5	-	3	2	176
TOTAL "ACO NORDIC GROUP A/S"	27	118	96	14	32	33	7	3	8	2	8	5	353

* age groups are 3: a) under 30; b) between 30 and 50; c) above 50

															Changes during 2020																													
															Hires			Resigned			Dismissed			Maternity			Retired / other																	
															Male		Female	Male		Female	Male		Female	Male		Female	Male		Female															
															A	B	C	A	B	C	A	B	C	A	B	C	A	B	C	A	B	C	A	B	C									
ACO Denmark																1					1						1																	
ACO Sweden																		1			2																							
ACO Finland																1																												
ACO Norway																2																												
Division ACO																1	3	0	0	1	0	0	1	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0					
Plastmo Denmark																2	9	4	1			8			1	1	2	1																
Plastmo Norway																																		1										
Plastmo Poland																									3	6	2	1	6															
Plastmo Railing																2			1						4	1		1																
Divison Plastmo																2	11	4	1	1	0	0	8	0	0	0	0	4	11	5	2	6	1	0	0	0	1	0	0	0	0	0		
ACO Lithuania																1																												
ACO Latvia																												1						1										
ACO Estonia																			1			1																						
Division Baltic																0	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0		
Nordic Group																			1			1						1																
ACO Servicepartner																																												
TOTAL NORDIC SUBGROUP																3	15	4	2	3	0	1	10	0	0	2	0	4	12	5	2	8	1	0	0	0	2	0	0	0	0	0		
Hvidbjerg																16	8	14	4	4	6	8	7	6	5	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	2
TOTAL "ACO NORDIC GROUP A/S"																19	23	18	6	7	6	9	17	6	5	6	0	4	12	5	2	8	1	0	0	0	2	0	0	2	0	2		

* age groups are 3: a) under 30; b) between 30 and 50; c) above 50

Career development			
Avg. hours of training per employee	# of employees under bonus scheme	%	For the ones not having bonus, do they have regular performance and career development reviews?

ACO Denmark			0,0%	-
ACO Sweden	14	27	100,0%	-
ACO Finland		8	88,9%	
ACO Norway	75	7	87,5%	
Division ACO			0,0%	
			0,0%	
Plastmo Denmark	3	29	48,3%	all 1 once a year
Plastmo Norway	2	9	81,8%	
Plastmo Poland	N/A	N/A	N/A	N/A
Plastmo Railing			0,0%	
Divison Plastmo			0,0%	
ACO Lithuania	3	4	50,0%	
ACO Latvia	-	5	62,5%	-
ACO Estonia	8	4	100,0%	
Division Baltic			0,0%	
Nordic Group			0,0%	
ACO Servicepartner			0,0%	
TOTAL NORDIC SUBGROUP			0,0%	
Hvidbjerg	-	-	0,0%	-
TOTAL "ACO NORDIC GROUP A/S"			0,0%	

Table 5.- External initiatives and memberships

	Collective bargain	External initiatives	Membership associations
ACO Denmark	If union	Hospitals klovne - TI	Dansk Industri
ACO Sweden	If union	The West Sweden Ch	Yes
ACO Finland	If union		
ACO Norway	If union	No	No
Division ACO			
Plastmo Denmark	If union	Kværkeby IF, Ringste	Dansk Industri, Wuppi
Plastmo Norway	If union	No	No
Plastmo Poland	If union		
Plastmo Railing	If union	No	GF Norge , NHO
Divison Plastmo			
ACO Lithuania	If union		
ACO Latvia	If union	No	No
ACO Estonia	If union	No	No
Division Baltic			
Nordic Group	If union		
ACO Servicepartner	N/A	N/A	N/A
TOTAL NORDIC SUBGROUP			
Hvidbjerg	If union	N/A	Dansk Industri
TOTAL "ACO NORDIC GROUP A/S"			

Appendix 2.- GRI content index

1.- General disclosures

1.1.- Organizational profile

Disclosure 102-1 Name of the organization [section 2.1].

Disclosure 102-2 Activities, brands, products, and services [section 2.3].

Disclosure 102-3 Location of headquarters [section 2.1].

Disclosure 102-4 Location of operations [section 2.1].

Disclosure 102-5 Ownership and legal form [section 2.1 and appendix 1, table 1].

Disclosure 102-6 Markets served [section 2.1 and 2.3].

Disclosure 102-7 Scale of the organization [appendix 1, table 2].

Disclosure 102-8 Information on employees and other workers [appendix 1, tables 4].

Disclosure 102-9 Supply chain [section 2.2].

Disclosure 102-10 Significant changes to the organization and its supply chain [section 2.4].

Disclosure 102-11 Precautionary Principle or approach [section 2.2].

Disclosure 102-12 External initiatives [appendix 1, table 5].

Disclosure 102-13 Membership of associations [appendix 1, table 5].

1.2.- Strategy

Disclosure 102-14 Statement from senior decision-maker [section 1].

Disclosure 102-15 Key impacts, risks, and opportunities [section 1 and section 2.5].

1.3.- Ethics and integrity

Disclosure 102-16 Values, principles, standards, and norms of behavior [section 3.1].

Disclosure 102-17 Mechanisms for advice and concerns about ethics [section 3.1].

1.4.- Governance

Disclosure 102-18 Governance structure [section 2.6].

Disclosure 102-19 Delegating authority [section 2.6].

Disclosure 102-23 Chair of the highest governance body [section 2.6].

Disclosure 102-24 Nominating and selecting the highest governance body.

Disclosure 102-25 Conflicts of interest [section 3.2].

Disclosure 102-26 Role of highest governance body in setting purpose, values, and strategy [section 2.6].

Disclosure 102-33 Communicating critical concerns [section 2.6].

1.5. Stakeholder engagement

Disclosure 102-40 List of stakeholder groups [Section 2.10].

Disclosure 102-41 Collective bargaining agreements [appendix 1, table 4].

Disclosure 102-42 Identifying and selecting stakeholders [Section 2.10].

Disclosure 102-43 Approach to stakeholder engagement [Section 2.10].

Disclosure 102-44 Key topics and concerns raised [Section 2.10 and appendix 1, table 3].

1.6. Reporting practice

Disclosure 102-45 Entities included in the consolidated financial statements [Section 2.1 and appendix 1, table 1].

Disclosure 102-46 Defining report content and topic Boundaries [section 1.1].

Disclosure 102-47 List of material topics [section 1.1].

Disclosure 102-48 Restatements of information [section 1.1].

Disclosure 102-49 Changes in reporting [section 1.1].

Disclosure 102-50 Reporting period [section 1.1].

Disclosure 102-51 Date of most recent report [section 1.1].

Disclosure 102-52 Reporting cycle [section 1.1].

Disclosure 102-53 Contact point for questions regarding the report [section 1].

Disclosure 102-54 Claims of reporting in accordance with the GRI Standards [section 1.1].

Disclosure 102-55 GRI content index [appendix 2].

Disclosure 102-56 External assurance [section 1.1].

2.- Topic specific disclosures

2.1. Management approach on transparency and good governance [section 3.1]

2.1.1. GRI 205: Anti-corruption

Disclosure 205-1 Operations assessed for risks related to corruption [section 3.1]

Disclosure 205-2 Communication and training about anti-corruption policies and procedures [section 3.1]

Disclosure 205-3 Confirmed incidents of corruption and actions taken [section 3.3].

2.1.2. GRI 206: Anti-competitive behavior

Disclosure 206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices [section 3.3].

2.1.3.- GRI 419: Socioeconomic compliance

Disclosure 419-1 Non-compliance with laws and regulations in the social and economic area [section 3.3].

2.2. Management approach on Human Rights [section 5.1]

2.2.1.- GRI 408: Child Labor

Disclosure 408-1 Operations and suppliers at significant risk for incidents of child labor. [section 5.2]

2.2.2.- GRI 409: Forced or compulsory labor

Disclosure 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor. [section 5.2]

2.3.- Management approach on Social and Employee matters [section 4.1]

2.3.1.- GRI 401: Employment

Disclosure 401-1 New employee hires and employee turnover [section 4.4].

Disclosure 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees [section 4.4].

Disclosure 401-3 Parental leave [section 4.4].

2.3.2.- GRI 402: Labor/Management relations

Disclosure 402-1 Minimum notice periods regarding operational changes [section 4.3]

2.3.3.- GRI 403: Occupational Health and Safety

Disclosure 403-1 Occupational health and safety management system [section 4.2]

Disclosure 403-2 Hazard identification, risk assessment, and incident investigation [section 4.2].

Disclosure 403-3 Occupational health services [section 4.2].

Disclosure 403-4 Worker participation, consultation, and communication on occupational health and safety [section 4.2].

Disclosure 403-5 Worker training on occupational health and safety [section 4.2].

Disclosure 403-6 Promotion of worker health [section 4.2].

Disclosure 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships [section 4.2].

Disclosure 403-8 Workers covered by an occupational health and safety management system [section 4.2].

Disclosure 403-9 Work-related injuries [section 4.2].

Disclosure 403-10 Work-related ill health [section 4.2].

2.3.4.- GRI 404: Training and education

Disclosure 404-1 Average hours of training per year per employee [\[section 4.5\]](#)

Disclosure 404-2 Programs for upgrading employee skills and transition assistance programs [\[section 4.5\]](#).

Disclosure 404-3 Percentage of employees receiving regular performance and career development reviews [\[section 4.5\]](#)

2.3.4.- GRI 405: Diversity and equal opportunity

Disclosure 405-1 Diversity of governance bodies and employees [\[section 4.4\]](#)

Disclosure 405-2 Ratio of basic salary and remuneration of women to men [\[section 4.4\]](#)

2.3.5.- GRI 406: Non Discrimination

Disclosure 406-1 Incidents of discrimination and corrective actions taken [\[section 4.4\]](#)

2.3.6.- GRI 407: Freedom of association and collective bargaining

Disclosure 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk [\[section 4.3\]](#).

2.4.- Management approach on customer satisfaction and adaptation to their needs

2.4.2.- GRI 416: Customer Health and Safety

Disclosure 416-1 Assessment of the health and safety impacts of product and service categories. [\[section 7.2\]](#)

Disclosure 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services. [\[section 7.2\]](#)

2.4.3.- GRI 418: Customer Privacy

Disclosure 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data [section 7.3]

2.5.- Management approach on environmental protection, including climate [section 6.1]

2.5.1.- GRI 303: Water and effluents

Disclosure 303-1 Interactions with water as a shared resource [sections 6.1 and 6.2]

Disclosure 303-2 Management of water discharge-related impacts [sections 6.1 and 6.2]

Disclosure 303-3 Water withdrawal [section 6.3]

Disclosure 303-4 Water discharge [section 6.3]

Disclosure 303-5 Water consumption [section 6.3]

2.5.1.- GRI 307: Environmental compliance

Disclosure 307-1 Non-compliance with environmental laws and regulations. [section 2.5]

2.5.2.- GRI 308: Supplier Environmental Assessment

Disclosure 308-1 New suppliers that were screened using environmental criteria [section 6.3]

Disclosure 308-2 Negative environmental impacts in the supply chain and actions taken [section 6.3]