

# Non-Financial Information Statement

Neenah Spain Holdings and subsidiary companies

2022



More than 40 years manufacturing the highest quality siliconized paper and film

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# 1 Introduction



# Contents of This Document

Neenah Spain Holdings and Subsidiary Companies is reporting this non-financial information statement that has been drafted in accordance with the requirements set forth in **Spanish law 11/2018 of 28 December**, which modifies the Commercial Code, the reformulated text of the Corporate Enterprises Act approved by Royal Legislative Decree 1/1020 of 2 July, and law 22/2015 of 20 July for Accounts Auditing in regards to non-financial information and diversity, published in the Spanish Official Gazette on 29 December 2018. The statement includes information about **environmental and social issues as well as issues related with staff, the company, respecting human rights and the fight against corruption and bribery.**

This non-financial information statement has been drafted in accordance with the commercial regulations in force and following the criteria of the selected Sustainability Reporting Standards of the Global Reporting Initiative (GRI standards), as well as other criteria described in accordance with the aforementioned for every topic on the “Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)”.

The period between April and December 2021 was covered in 2021, due to the acquisition of Global Release Liners, S.L.U. by Neenah Spain Holdings, S.L.U., being as it was the first period in which the Group met the established limits and, consequently, they were required to draft, report and publish the non-financial information statement. In the 2022 fiscal year, the period between January and December 2022 was covered, with the goal of drafting, reporting and publishing this non-financial information statement.

Insofar as the scope of the companies that make up the Group, it should be pointed out that, based on their quantitative representation in environmental and social terms primarily, as well as the nature of their business activities, this non-financial information statement includes information about Industrias de Transformación de Andoain, S.A.U. and Itasa América, S.A. de C.V. and the following companies are excluded for the reasons stated.

- Neenah Spain Holdings, S.L.U.
- Global Release Liners, S.L.U.
- Itasa Asia Sdn. Bhd.





## **2 About Us**

**“We’re committed to creating growth for our employees, clients, end users and shareholders.”**

# Presentation of Our Group

Since 1974, Industrias de Transformación de Andoain S.A., ITASA has been developing release liners for all kinds of end-use products in a multitude of industries and segments, which include labels & shipping, self-adhesive tape, personal care, the graphic arts, medicine, composites and food packaging



Self-adhesive Tapes



PS Labels & Shipment



Graphic Arts



Personal Care



Itasa Plus



Medical



Composites



Food Packaging



Industrial Specialties

The interaction of the paper or film and silicone with different kinds of adhesives and substrates, in addition to the wide variety of manufacturing processes, requires highly technical knowledge, the function of which is to maintain the essential properties of the products in which they are used, either for end-use protection or manufacturing.

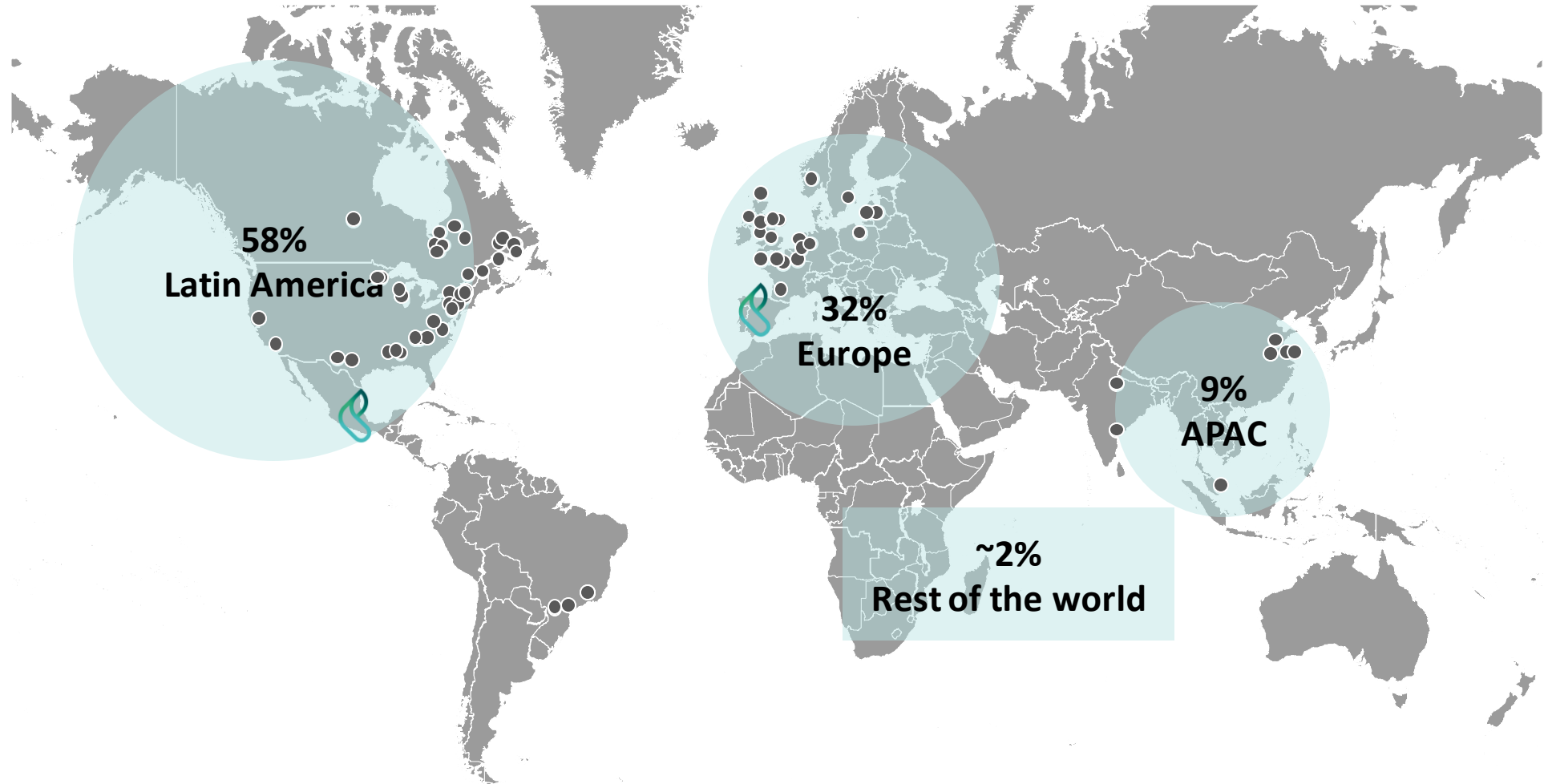
On 6 April 2021 we were acquired by Neenah Inc. through the Neenah Spain Holdings, S.L.U. company, which became the head of the group, a global manufacturer of special materials.

Later in 2022, Neenah Inc and Schweitzer-Mauduit International materialized a merger of equals that gave rise to Mativ Inc., which is a global leader in technical materials with seven business units: filtration, protective solutions, industrial, release liners, health care, packaging & specialty paper and engineered paper.

While at Itasa we are specialized in release liners, as a group we are nourished by the resources and experiences that belonging to Mativ gives us.

We have developed a capacity to grow and evolve faster than ever, increasing our worldwide presence. We do not just have our plants in Andoain and Querétaro, where we have more than 300 workers, rather as members of Mativ, we benefit from belonging to a group with 55 plants around the world and selling in more than 100 countries.

# Mativ Around the World



- ▣ Sales in +100 countries
- ▣ Production plants on 4 continents
- ▣ ~7500 Employees

# ITASA, committed to innovation to create value



Historically, Itasa has based their growth on **customer intimacy**, a unique and different way to cultivate our relationships with clients that over the years has shaped the kind of growth we pursue, accompanying clients as business partners.

Nevertheless, to accelerate that growth we also rely on new technologies, which is a sign of our firm commitment to transformational innovation.

We create value for our clients, working closely, creating adapted solutions and giving life to the potential of their ideas, thanks to our team of experts, our know-how and cutting edge technology.

**Colab**, our innovation hub, is where we seek responsible environmental solutions. At Itasa Colab we open the doors of innovation towards the reuse, recycling and sustainability of the release liners of the future.

As active members of **CELAB**, we are committed to searching for sustainable solutions that make it possible for us to grow. And at the same time we follow sustainable environmental policies with the goal of redesigning the release liner industry.

Our growth goal is ambitious, and it is not free of difficulties. Operating costs, supply chain disruption and price increases in raw materials and energy do nothing other than paint a picture of a challenging path, to which we are responding with an increase in global capacity and presence, in addition to our firm commitment to innovation, technology and sustainability. Adapting from one day to another has been and still is our way of responding to challenges.

2022 was a year in which the performance of Itasa was notable, and it was a fiscal year that was not exempt from volatility.

>168,000

Thousands of Euros of Sales

>300

Employees

Also aware of the importance of working towards making our area more sustainable and environmentally responsible, at the Andoain plant we are seeing our efforts pay off in terms of the reduction in consumption.

-1.00%

Natural gas consumption

+0.81%

Electricity consumption

-0.89%

Packaging consumption

+14.59%

Non-hazardous waste management

+8.11 %

Hazardous waste management

# Primary Corporate and Operational Milestones



## CORPORATE MILESTONES

1974

The Pagola & Arocena families found ITASA

2008

ITAMAR starts exporting their products to South and Central America

2016

Magnum Industrial Partners purchases ITASA.

2017-2018

Acquires client portfolio from Maria Soell in Germany.

2019

ITASA opens the plant in Querétaro, Mexico.

2021

Neenah acquires ITASA to expand their specialty coatings platform.

2023

ITASA kicks off their new investment project to double their capacity in Querétaro.

1989-2007

ITASA installs three latest-technology siliconging lines with a speed of 1000 m/min to accompany the notable growth of the business.

2010-2011

ITASA doubles the area of their facilities, installing a 4th silicone coating machine.

2012-2013-2014

ITASA installs a Flexo Offline printer with a speed of 800 m/min.

ITASA acquires two rewinders and a new packaging line.

Facilities expansion, offices and Andoain laboratory

2015-2016

ITASA installs web detection devices on three machines.

ITASA installs a new ERP system.

2019

ITASA inaugurates a latest generation silicone coating machine in Mexico with an initial capacity of 250 Mm<sup>2</sup>.

2022

Neenah and SWM merge to create Mativ, the global leader in technical materials.

## OPERATIONAL MILESTONES



## *Growth*

Growth in conjunction with clients does not happen by chance, but rather as the result of working alongside our *partners*. That is how we work and grow, hand in hand with our clients, suppliers and employees



## *Innovation*

To give shape to the future of the release liner it is necessary to invest in new technologies and put them into use. That is how we are designing new solutions while we redesign the industry.



## *Sustainability*

At Itasa we are committed to seeking out sustainable solutions that make growth possible, at the same time that we support responsible environmental policies.  
- We are proud to be members of CELAB



## **3 Building long-lasting relationship with stakeholders**

**“We’re committed to excellence and  
respecting the needs and expectations of all  
our stakeholders.”**

# Identification of Material Sustainability Issues

Materiality analysis is the tool that allows us to identify the most important issues for companies and their stakeholders. Priorities for action and the content presented in this non-financial information statement are defined on the basis of the analysis results.

At ITASA we did our materiality assessment in fiscal year 2022, taking into account the following steps:



## Identification

Reports by the main competitors, news and content published in the media, sustainability requirements to certify suppliers and materiality assessments published by the primary suppliers, emerging sustainability trends and standards, and the requirements of the non-financial information regulations were analyzed in the **external analysis**.

In the **internal analysis**, internal sources like ITASA's vision and values, the Mativ and ITASA code of conduct, the main policies, internal rules and manuals approved by the Group, as well as questionnaires sent to the main area managers of Itasa were analyzed.



## Prioritizing

As a result of the analysis, we obtained 29 important issues an assessment was done for where several sources of information were used depending on their importance for the company and its stakeholders.

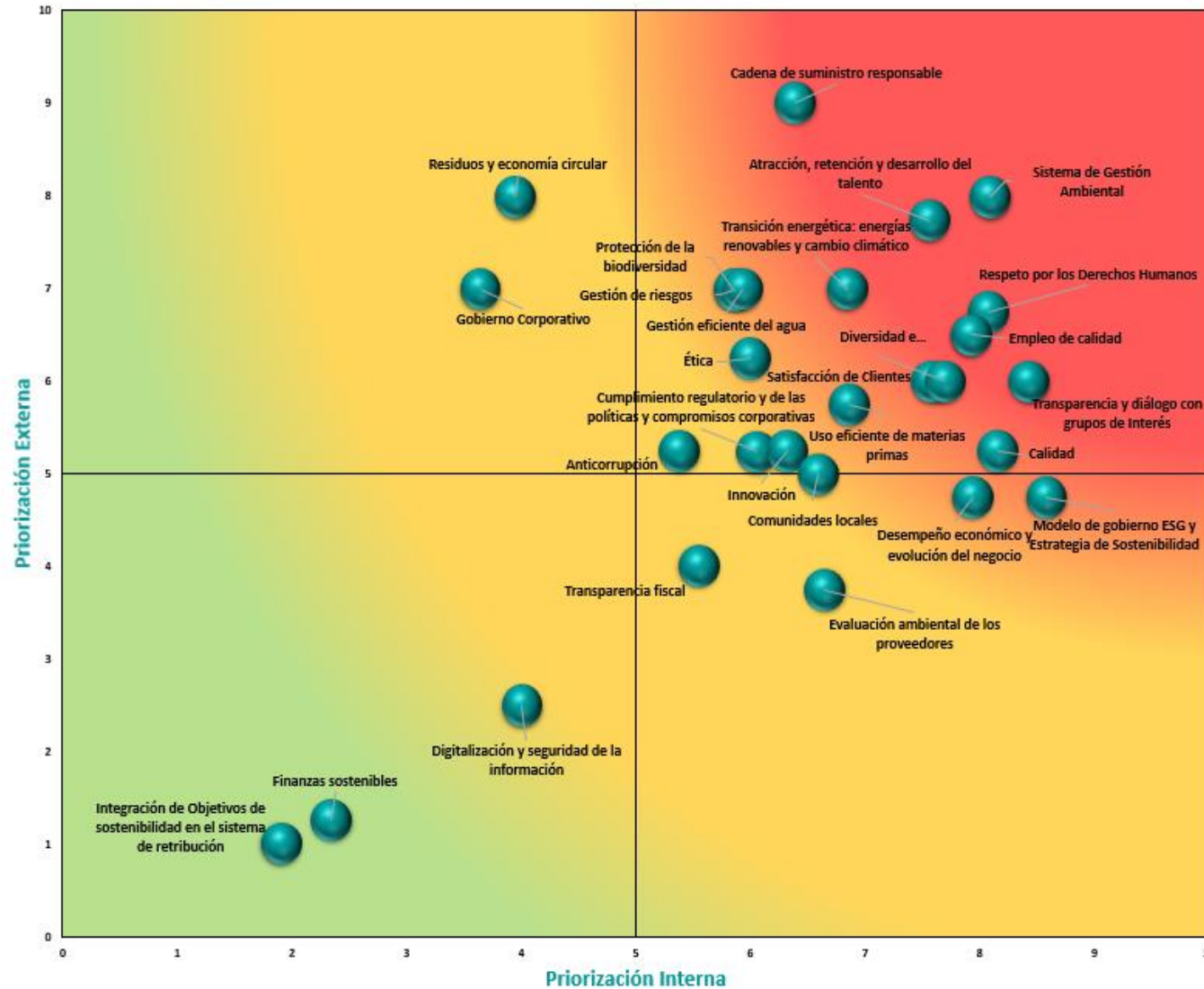


## Validation

The prioritizing was validated internally by the ITASA management, and the importance of the various issues and their relevance to the Group's goals were verified.

# Materiality Matrix

Lastly, we produced the materiality matrix according to the two axes of relevance based on the internal and external prioritizing.



# Material Topics

The 29 material topics we have identified and evaluated at ITASA are shown below. The work related with the SDGs, indicators and measures implemented in the organization that we have been producing and updating and that are handled in more depth in the following section of this non-financial information statement, “Sustainable Development Goals”, should be highlighted.

Good Governance Dimension	Corporate governance
	Risk management
	Ethics
	Regulatory compliance and corporate commitment policies
	Anti-corruption
	Transparency and dialog with stakeholders
	ESG governance model and sustainability strategy
	Integrating sustainability goals into the compensation system

Social Dimension	Respect for human rights
	Safety and security in the entire value chain
	High-quality employment
	Attracting, retaining and developing talent
	Local communities
	Diversity and equal opportunities

Economic Dimension	Economic performance and business evolution
	Fiscal transparency
	Quality
	Client satisfaction
	Digitalization and information security
	Responsible supply chain
	Innovation
	Sustainable finance

Environmental Dimension	Protecting biodiversity
	Waste and the circular economy
	Efficient water management
	Efficient use of raw materials
	Environmental assessment of suppliers
	Environmental Management System
	The Energy Transition: renewable energy and climate change



## **4 Sustainable Development Goals**

**“We are committed to our local area and we believe in creating wealth and employment to benefit our society.”**

# 2030 Agenda for Sustainable Development and Global Compact Principles

In September 2015, the General Assembly of the United Nations approved the [2030 Agenda](#) for sustainable development and with it the [Sustainable Development Goals \(SDGs\)](#). It is a call to the world to adopt measures that end the major problems of the planet, bring an end to poverty and inequality, achieve gender equality and access to a decent job for everyone, provide access to health services and adequate education, protect the environment and guarantee peace and safety for everyone.

Achieving the SDGs is also related with implementing the ten [principles of the Global Compact](#) in the private business sector, because both framework areas are transversal in the goal they pursue, which is to build more sustainable markets and societies.



# Our Commitment

*“At ITASA we’re deeply committed to the 2030 Agenda and achieving the United Nations Sustainable Development Goals. So much so that we’ve created a **Sustainability Committee** at the Andoain plant that meets at least yearly for the execution, monitoring and supervision of the sustainable development strategy. Likewise, our General Management is informed about the results of the monitoring and any anomalies, so they can define and implement measures that guarantee compliance and achievement.”*



As a consequence of our commitment, at ITASA we make our **sustainable development policy available to our stakeholders on our corporate website**. The policy is reviewed and updated frequently to ensure that all the Group’s actions and areas of activity are aligned with the SDGs and that we are promoting the following **general principles** of action that we hope are shared and personally adopted by all the employees that are part of the ITASA team.

At ITASA we base commitments with our clients on the principles of good faith, trust, professionalism, collaboration, loyalty and reciprocity.

complying with regulations in any country, we adhere to international regulations, rules, directives and commitments when there is not an adequate local legal structure.

We support, and by example spread, the culture of the SDGs to the extent possible.

We improve free commerce practices and reject any illegal or fraudulent activities. To those ends, we will implement effective monitoring mechanisms and we will punish any irregular activity. Any corrupt act we find will be persecuted and charges will be filed.

We will promote channels for dialog to improve how information and ideas are exchanged between staff, clients, suppliers and other civil society entities in order to provide the best product and services possible to clients and the market.

# Providing value to our stakeholders

With the intention of deploying that commitment in the organization's day-to-day operations, at ITASA we have put focus on the following **four areas of sustainability** that we believe are **high priority**, and for which we have established quantifiable and measurable goals for the 2022 fiscal year.



As an outcome of that evaluation, and considering the contribution analysis of ITASA's activities, we have identified nine SDGs to focus on. Nevertheless, it should be underlined that the activities of the companies that make up ITASA have an impact on 14 of the 16 SDGs, and not just the nine goals we have deemed high priority and secondary for the current fiscal year.

## PRIORITY SDGs



## SECONDARY SDGs



For each goal, we have defined **indicators to measure the contribution** of ITASA Andoain to each one, which will be presented and included in the respective sections throughout this non-financial information statement.

That methodology and systematic approach in itself responds to ITASA's commitment to contributing to target 12.6 of Sustainable Development Goal 12 through defining indicators that let us measure progress in sustainable development and present the results in the annual report.

**Goal 12** intends to ensure sustainable consumption and production patterns.  
**Target 12.6** intends to adopt sustainable practices in organizations and make information about sustainability public.

Likewise, it should be highlighted that we have linked the aforementioned indicators as well as the lines of action ITASA will take with our **model of responsible growth**.



# A Recognized Management System

Our **sustainable management system** for the Andoain plant is endorsed by the independent international **ECOVADIS organization** that evaluates ITASA's compliance and performance of it in four areas annually: the environment, labor practices and human rights, ethics and sustainable purchasing. As a result of that evaluation, in the 2023 fiscal year ITASA obtained the **silver rating**. And it is our intention to continue renewing our system and having it audited in coming years.



Likewise, it is relevant to point out that ITASA's high level of commitment is shared, and it is deeply rooted in the **Mativ Group**, which we are a part of. That commitment is materialized through choices and investments we make for the safety and well-being of our employees, the efficiency of our products and operations, and in our support of the communities where we are present.

In the interests of transparency and with the intention to make our stakeholders participants in the main initiatives, goals and indicators we work on and monitor in the area of sustainability at Mativ, every year we publish the reports referred to as the **"Corporate Sustainability Report"** and the **"Environmental, Social, and Governance Report"** on the Group's corporate website. Without aiming to be exhaustive, we would like to highlight the following measures and actions started during the previous fiscal year.

- Investing in technology that reduces our environmental footprint even more
- Reinforcing the sustainability of our supply chain by requiring all suppliers to adhere to our business code of conduct and the ethical purchasing policy and making suppliers in high-risk countries to commit to doing CSR audits
- Launching new sustainable products on the market
- Increasing the diversity of our administrative board and management team and strengthening the principles of gender and ethnic diversity and social inclusion in hiring, planning succession and training our workforce
- Expand the supervision responsibilities of the administrative board in promoting ethical behavior, corporate culture and the health and safety of the employees

The independent expert ECOVADIS evaluated Neenah's management system in fiscal year 2021, and they obtained a silver rating in recognition of their compliance with the regulations in force and applying best practices in terms of sustainability.





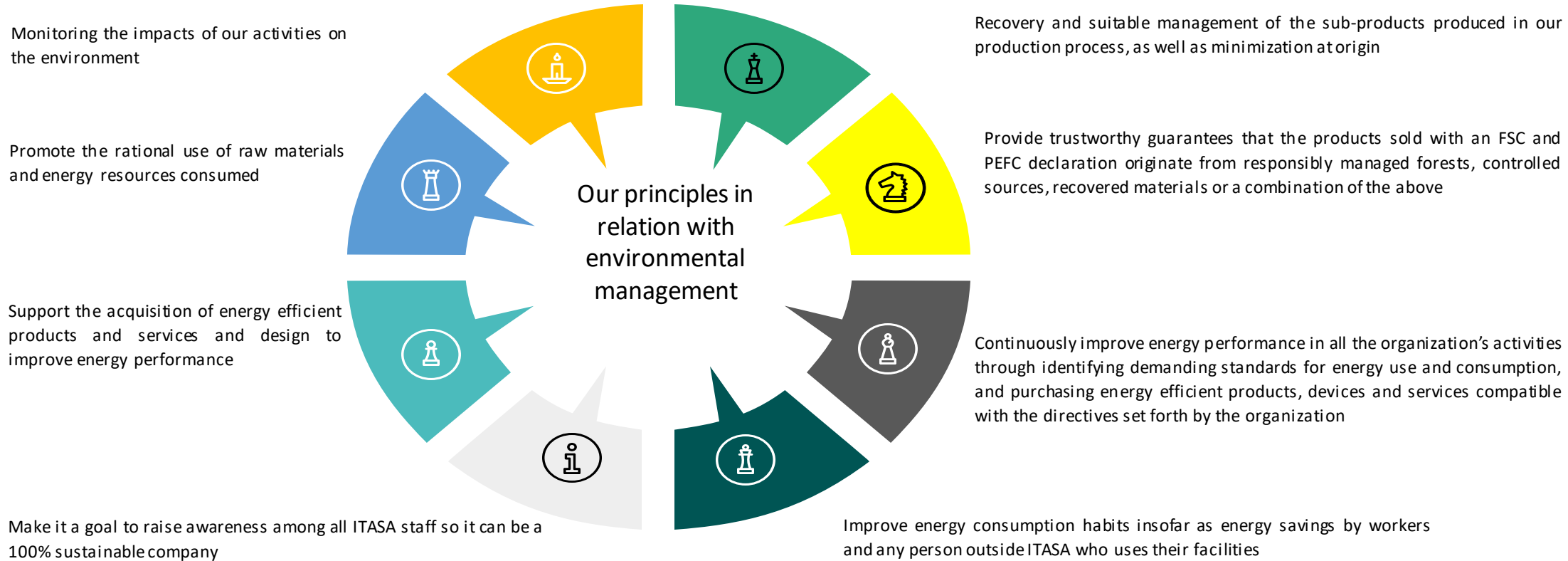
## **5 Responsible Environmental Management**

**“At ITASA we want to actively and unequivocally contribute to a low carbon sustainable future, an effort that will also drive social and economic development through generating wealth and employment.”**

# Responsible Principles for Monitoring the Environmental Impact of our Activities

In the 2020 fiscal year, work was done in the heart of the company to develop and update an **integrated managements systems policy** that incorporates our commitment to protecting the environment, quality and health and safety.

Insofar as the environment, in addition to reinforcing the importance of integrating practices that ensure compliance with all the laws and business requirements that are applicable to us into our daily activities, we focus on being able to ensure that part of our production is manufactured with paper from wood that comes from a **sustainably managed forest**.



At the Mexico plant, it should be noted that we have **"internal regulations for health, safety and the environment in the workplace"**, which is compulsory for ITASA staff as well as clients, suppliers, outsourced workers and visitors of any kind.

# A dedicated team for protecting the environment



ISO 14001



ISO 50001

All those principles are reflected in our day-to-day practices and in the **environmental, energy efficiency, supply chain and chain of custody management systems** that are **certified** at both the Andoain and Mexico plants.

Andoain Plant		Mexico Plant	
ISO 14001	Environmental Management System	FSC	Chain of Custody Management System
FSC	Chain of Custody Management System	PEFC	Chain of Custody System for Forest Products
ISO 50001	Energy Management System		
PEFC	Chain of Custody System for Forest Products		

“MATIV has Green Seal certification, which is a symbol of recognition that ensures the paper is manufactured with a minimum of 30% post-consumer fibers and that the processes are preferable from an environmental point of view. They are also Green-e certified, which verifies that the company replaces the use of fossil fuels with energy generated using sources like hydroelectric, wind or solar energy.

As a consequence of the work and reflection obtaining the aforementioned certificates requires, at the ITASA plant in Andoain we have **identified the environmental risks and issues** we are exposed to, and we have done an evaluation and prioritizing based on the variables of magnitude and toxicity or danger to determine which ones are most critical for us.

It should be noted in this context that the primary aspects identified are associated with the consumption and waste management of certain inks used by request from our clients, the CO<sub>2</sub> emissions generated in distributing and transporting raw materials, the efficiency of our gas and electricity consumption in certain facilities at the plant and monitoring it and, lastly, the use of resources like plastic and labels when packaging our products to send them to our clients.

Well aware of the importance of risk management, at ITASA we have **internal and external resources** that make it possible for us to mitigate and control the risks we face in carrying out our business activities. A show of that is that **we did not get any fines or sanctions in fiscal year 2022** for not complying with the law or applicable regulations or for actions within the framework of our business that could harm or damage the environment.

Aware of the environmental impact our operations have, and with the firm commitment to advance towards responsible and sustainable management, meetings are held periodically in order to monitor and supervise the evolution of environmental risks, the amount of progress of the measures to be implemented to reach the SDG indicators, and any other issues derived from this area that is deemed to be relevant.

Insofar as day-to-day actions and supervision, we have both a team dedicated exclusively to the integrated quality, environmental, and health safety management systems, and one for staff that, among other functions and responsibilities, are charged with protecting and caring for certain environmental issues, for example waste management and responsible resource use.

likewise, ITASA recurrently hires independent experts who perform certain services associated with audits, inspections and maintenance tasks, among other things.

In 2022 the audit of the integrated environmental management and energy management system was done regarding the requirements specified in the ISO 14001:2015 and ISO 50001:2018 reference standards.

# Committed to Responsible and Circular Water Use

At Itasa we are aware of the importance of **preserving natural resources**, and water is a scarce good that must be conserved. On the sustainability committee we promoted **two initiatives** during the fiscal year aimed at incentivizing and raising awareness among employees about responsible water consumption.

- Campaign to Improve Consumption Habits
- Water Footprint Calculation

In regards to the Andoain plant, it should be noted that we are committed to contributing to Sustainable Development Goal 6, reducing the contaminant load in discharge effluents and, consequently, improving water quality.



**Goal 6** intends to ensure access to and sustainable management of water and sanitation for everyone.

**Target 6.3** intends to improve water quality and reduce pollution.



We have defined the following indicators to measure our contribution at the Andoain plant. They have been calculated and monitored since the 2018 fiscal year (\*).

Indicators	2018	2019	2020
DQO	69	130	99
DBO (mg/l O <sub>2</sub> )	40	42	30
SS (mg/l O <sub>2</sub> )	10	10	12

On the other hand, insofar as ITASA's total water consumption during the 2022 fiscal year in Andoain and Mexico, it was:

Water consumption (m <sup>3</sup> )	2022	2021
Well consumption	28,830	30,629
Network consumption	6,533	2,629

# Consolidating Our Commitment to Energy Efficiency

Aware of the importance of improving continuously in **energy performance** in all of the organization's activities by creating strict standards for energy use and consumption, purchasing energy efficient products, equipment and services compatible with the directives of the organization and improving consumption habits, at ITASA Andoain we have committed to achieving Sustainable Development Goal 7.



**Goal 7** intends to ensure people's access to accessible energy, increase the use of renewable energies and promote energy efficiency.  
**Target 7.3** intends to double the energy efficiency rate.

ITASA's contribution to that goal is materialized through the implementation of a **(ISO 50001)** certified energy management system at the Andoain plant that makes it possible to do detailed monitoring of all consumption and identify areas for improvement to optimize production processes.

Indicators (kwh/m <sup>2</sup> )	2019 vs. 2018	2020 vs. 2019	2021 vs. 2020	2022 vs. 2021
Total natural gas consumption	-0.71%	+1.43%	-4.71%	-1.00%
Total electricity consumption	-0.33%	+0.03%	-3.74%	+0.81%

It should be noted that in the **2022 fiscal year** the **electricity** was **of renewable origin**, being as a supplier was found that could supply 100% green energy.

We will present the energy consumption data for scopes 1 and 2 for the 2022 and 2021 fiscal years at Andoain below.

Energy consumption	2022	2021
Natural gas (kWh)	25,907,069	22,626,590
Diesel (liters)	3,000	781
GLSP (liters)	18,133	9,282
Coolants (Kg)	14	49
Electricity (kWh)	6,494,487	5,588,451

As an outcome of our concern for efficiency, at ITASA we have obtained the **Energy Qualification for Buildings certificate** for the Andoain plant from the Basque Government with a B level rating in primary energy consumption and CO2 emissions on a scale of A-G, with the A rating being the most efficient.

Likewise, actions have been started aimed at installing charging points for electric and hybrid cars at the Andoain plant, a measure that we expect to be completely implemented in the 2023 fiscal year. All those actions are accompanied by training sessions and awareness raising campaigns for all employees at the Andoain plant.

# Committed to the Sustainable Consumption of Raw Materials

Aware of the need to evolve towards a sustainable purchasing policy and create and promote **long term relationships with strategic suppliers** who are committed to the highest standards in regards to the ESG areas, at ITASA Andoain we have set out to contribute to the following SDGs.

To improve our indicators, we have focused on the design and implementation of the following primary measures.



**Goal 8** intends to promote sustained, inclusive and sustainable economic growth, and full and productive employment and decent work for everybody.

**Target 8.4** intends to improve productivity and the efficient consumption of resources and decouple economic growth from environmental degradation.



**Goal 12** intends to ensure sustainable consumption and production patterns.

**Target 12.2** intends to achieve sustainable management and the efficient use of natural resources.



1. Continuous Improvement Projects: to improve resource usage
2. Promote Sustainable Purchases: increase purchases of FSC and PEFC paper and reduce consumption of wood, plastic and silicone.

We have defined the following indicators to measure our contribution. They have been calculated and monitored by ITASA Andoain (\*) since the 2018 fiscal year.

Indicators (%)	2019 vs. 2018	2020 vs. 2019	2021 vs. 2020	2022 vs. 2021
Effectiveness of the silicone coating machines	+2%	+1%	+1.7%	-0.7%
FSC-PEFC paper purchases	0.07	2.64	12.66	10
Packaging consumption	7%	-8.62%	-4.74%	-0.89%

# Committed to the Sustainable Consumption of Raw Materials



Likewise, at ITASA in the 2022 fiscal year we certified the **suppliers** we consider strategic, taking **ESG criteria** into account on this occasion, and in that way promoting the reduction of the environmental impact of transporting products and services and driving a more sustainable local economy.

Insofar as consumption of the primary raw materials, at both the Andoain and Mexico plants, the data from the 2022 fiscal year is:

Raw material consumption (Kg)	2022	2021
Paper	50,369,991	25,174,634
Silicone	1,546,646	912,713

As described in our integrated management systems policy, at ITASA **we will avoid consuming** raw materials supplied **from forest sources** that are considered to be **in conflict**, such as:

- Illegally harvested timber
- Timber harvested in a way that violates civil and traditional rights
- Timber harvested in forest areas where high conservation values are under threat from handling activities
- Timber harvested in forest areas that being converted into plantations or non-forest use areas
- Timber harvested in forest areas where genetically modified trees are planted

(\*) SDG indicator monitoring is done at a plant level, consequently, in the 2022 and previous fiscal years the information is available and it is monitored in Andoain.

# Focus on creating solutions associated with waste management

One of the key aspects of environmental management consists of having suitable waste management. Nevertheless, efficient resource use is not just related with making better use of raw materials, rather it establishes the concept of the circular economy, which reintegrates materials contained in waste into the process, either at the company itself or in other institutions, to create new products or raw materials.

Specifically, the goals ITASA intends to achieve after this project is implemented and deployed in the heart of the organization are the following.

- Manage all waste with the commitment to reach zero waste to landfills
- Make use of waste and increase the use of recycled material in production processes to get away from linear throwaway models
- Establish a methodology for evaluating the recycling rate
- Identify other potential recyclers
- Estimate the volumes of coatings and matrices by country

*“We’re committed to our local environment, and we believe in creating wealth and employment that benefits our society. Itasa centers their efforts on improving the local economic situation.”*



Along those lines, at ITASA, accompanied by an independent expert, we are creating the **Zero Waste** project that puts the focus on taking care of our local area through evaluating the following issues:

- Legal obligations (new European and local goals)
- Potential economic savings (the amount is higher and higher)
- Opportunities for operational continuous improvement
- Strategic positioning against the competition
- Ensuring transparency and traceability



# Waste Management: our figures

This project is clearly linked with and aimed at contributing to the following SDG.



**Goal 12** intends to ensure sustainable consumption and production patterns.

**Target 12.2** intends to considerably reduce waste generation through prevention, reduction, recycling and reuse.

Specifically, through waste reduction, recycling and reuse, ITASA Andoain is making a contribution until zero waste to the landfill is achieved (\*).

Indicators (%)	2020 vs. 2019	2021 vs. 2020	2022 vs. 2021
<b>Non-hazardous Waste Management</b>	+5.98%	-15.18%	+14.59%
<b>Hazardous Waste Management</b>	-4.16%	-12.09%	+8.11%

All waste is separated at origin at every production plant, and it is managed individually considering its classification.

The primary hazardous waste generated in fiscal year 2022 at the Andoain plant is the following.

<b>Hazardous Waste (kg)</b>	<b>2022</b>
Water with inks	44,555
Boiler cleaning water	-
Contaminated metal packaging	2,820
Contaminated plastic packaging	422
Solid silicone	43,098
Solvent based inks	595
Silicone contaminated with heptane	-
Used oil	25,000
Other hazardous waste	610
<b>Total</b>	<b>117,100</b>

Insofar as non-hazardous waste generated in fiscal year 2022 and 2021 at the Andoain plant, it is the following:

<b>Non-hazardous Waste (kg)</b>	<b>2022</b>	<b>2021</b>
Wood	60,190	28,560
Paper and cardboard	2,122,105	1,287,897
Clean plastic	11,599	5,263
Material with silicone	388,280	256,680
Film with silicone	11,340	-
<b>Total</b>	<b>2,593,514</b>	<b>1,956,600</b>

Insofar as the waste generated at the Querétaro plant in fiscal year 2022, the total amount of hazardous waste was 19,915 and the non-hazardous waste was 1,204,705. It was not possible to itemize the waste by type, as was the case for the Andoain plant.

In relation with managing the waste generated during the production process, in compliance with the applicable laws, ITASA manages hazardous and non-hazardous waste with authorized waste managers.

(\*). SDG indicator monitoring is done at a plant level, consequently, in the 2022 and previous fiscal years the information is available and it is monitored.

# The Fight Against Climate Change

“At ITASA we want to actively and unequivocally contribute to a low carbon sustainable future, an effort that will also drive social and economic development through generating wealth and employment.”

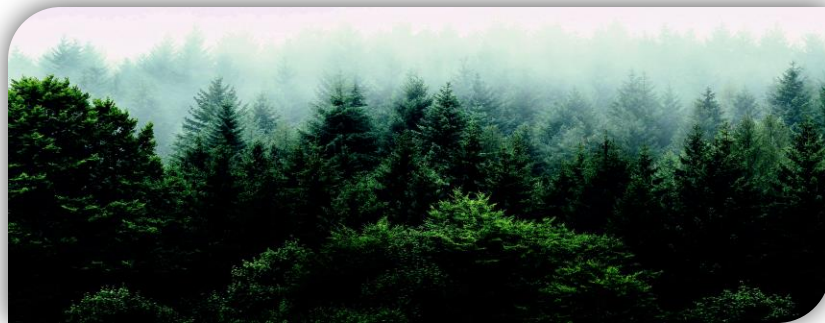
“At ITASA we want to actively and unequivocally contribute to a low carbon sustainable future, an effort that will also drive social and economic development through generating wealth and employment.”



To manage to fight against the challenge of climate change we do permanent monitoring of greenhouse gas (GHG) emissions, of the evolution of the sales of those emissions, and of how international agreements in that field can affect our Group, with the goal of making appropriate decisions to minimize risk and make the most of opportunities.



**Goal 13** intends to adopt urgent measures to combat climate change and its effects. **Target 13.2** intends to adopt measures related with climate change (mitigation and adaptation).



At ITASA Andoain, we hope to contribute through the **carbon footprint calculation** and by taking measures to reduce greenhouse gas (GHG) emissions by investing in and promoting less intensive technologies. Likewise, in the 2021 fiscal year, work was done on designing a personalized tool for ITASA that lets us identify risks and define measures to mitigate them. Insofar as the measurement indicators for contribution for the Andoain plant, the historical evolution is the following (\*).

Indicators	2020 vs. 2019	2021 vs. 2020	2022 vs. 2021
tCO2e / M € billed	-7.26%	-3.64%	-9.11%
tCO2e / M € sold	-10.63%	-5.45%	+15.49%
tCO2e / M € manufactured	7.58%	-3.33%	+12.34%

ITASA calculates its carbon footprint in three emissions scopes: Direct (scope 1), which includes emissions derived from fossil fuel consumption at its production plants; indirect (scope 2), which are derived from electricity consumption and; indirect (scope 3), which includes data associated with the value chain and from the organization itself.

Specifically, the carbon footprint calculation at the Andoain plant done in fiscal year 2022 shows the following data (\*).

Emissions (t CO2e)	2022	2021
<b>Stationary combustion</b>	4,17.13	4,119.82
<b>Mobile combustion</b>	40.77	18.27
<b>Flourinated gas recharge</b>	29.23	90.28
<b>Total scope 1</b>	4,787.13	4,228.37
<b>Electricity consumption</b>	1,312.31	1,129.23
<b>Total scope 2</b>	1,312.31	1,129.23

Emissions (t CO2e)	2022	2021
<b>Raw Materials</b>	60,576.00	49,915.00
<b>Upstream Transport</b>	7,725.29	3,976.39
<b>Downstream Transport</b>	7,946.49	4,145.68
<b>Waste Management</b>	52.98	41.07
<b>Water Consumption</b>	0.97	0.39
<b>In itinere travel</b>	32.49	249.95
<b>Business trips</b>	150.94	154.21
<b>Total scope 3</b>	76,485.17	58,482.69

# MATIV: A shared strategy and commitment

**“As part of the Mativ Group, we believe that accepting and taking on ESG opportunities is the right way to do business and create added value in the long term, creating a more resilient and sustainable company that is aligned with the expectations of our stakeholders.”**

**Mativ’s strategies and practices are designed to manage risks and advance towards a sustainable strategy in all the entities in the Group. Among the primary measures adopted for the 2022 fiscal year we can highlight the following.**

**Responsible Water Consumption:** The Mativ facilities are not located in areas where water availability is critical. Nevertheless, we are very aware of global, regional and local concerns about that natural resource.

**We understand that water scarcity can happen due to an increase in demand, pollution and changes in climate patterns or precipitation. For that reason, as a Group we are responding to the critical value of global water supplied from two points of view: water conservation and the latest generation water treatment.**

- ❑ **Raw Material Consumption:** We only buy fiber from sources that show sustainable practices and who are certified by one of the internationally recognized certification organizations, including the “Sustainable Forestry Initiative” (SFI), the “Forest Stewardship Council” (FSC), and the Program for the Endorsement of Forest Certification (PEFC). Whenever possible we use recycled fibers to manufacture our paper.
- ❑ **In that area, we also have other equally important recognitions and certifications:** “Post-Consumer Waste”, Green Seal, Ecovadis, Process Chlorine Free and Alternative Fibers.
- ❑ **Likewise, Mativ has made a commitment to not acquire any material from areas where human or civil rights are violated, or non-certified forests with a high conservation value that are threatened by handling activities, or from forest areas where genetically modified trees are planted.**
- ❑ **Energy consumption and greenhouse gas emissions:** Mativ continuously tries to find ways to increase efficiency, reduce the consumption of non-renewable resources, minimize their footprint and find new ways to save energy.

A man in a black polo shirt is standing in a factory, holding a large sheet of paper. He is wearing earplugs. The background shows industrial machinery, including a large roll of material being processed by a machine.

**6 Health and Safety: a commitment to excellence**

**“We have a firm commitment of responsibility to the health and safety of our employees, who make up our most valuable asset.”**

# Preserving Health and Job Satisfaction

The employees that make up ITASA are a fundamental asset for the Group, and their health and safety are a priority for management. That premise is included in the **code of conduct** for both ITASA and MATIV.

*“Itasa is committed to be responsible with the health and safety of its workers. We provide workplace safety and health protection in accordance with national laws and in conformance with our policy for protecting workplace health and safety. We preserve the health, productivity and job satisfaction of our employees, and constantly improve the work environment with a series of preventive and health improvement measures. Every one of our employees must contribute to preserving their health by following the rules for protecting it and for workplace safety.”*

*“Everyone (employees, directors, managers, outsourced workers and visitors to our facilities) have the right to expect a safe and healthy environment. Management is committed to maintaining the standards of the sector in all areas of health and safety for employees, including industrial hygiene, ergonomics and security. Maintaining a safe and healthy work environment requires continuous cooperation from all employees. Mativ’s commitment to health and safety means more than simply following safety rules. We can only reach our goal of a safe and healthy workplace with active participation and support from everyone. All employees and business associates are expected to understand and follow the health and safety policies and procedures. We must work together to maintain a workplace without hazards or foreseeable and avoidable risks.”*

That aspiration is included in the **integrated management systems policy** that, as stated in the previous section of this non-financial information statement, includes our commitment to protecting the environment, quality and health and safety. In regards to the last area, ITASA is committed to providing safe and healthy working conditions, preventing health damage or deterioration and promoting respect for social and health and safety requirements in the following way.

- Not impede workers from associating freely, choosing their representatives or collective bargaining with the company
- Not use any kind of forced labor
- Not hire workers under the minimum legal age of 15, or below the age of obligatory schooling if they are of legal age
- Not impede equal opportunities for or treatment of workers

# Our Monitoring Committees

The Mexico plant has its own “**internal safety, health and environmental regulations for the workplace**” that, in an equivalent way, ensures the protection of the physical integrity of people, machinery and the facilities and environment. Those regulations, as well as various measures, data and indicators, among other things, is supervised and monitored by the **Mixed Hygiene and Safety Commission** created in fiscal year 2020, that has support from an **external clinic** to provide the medical care service.

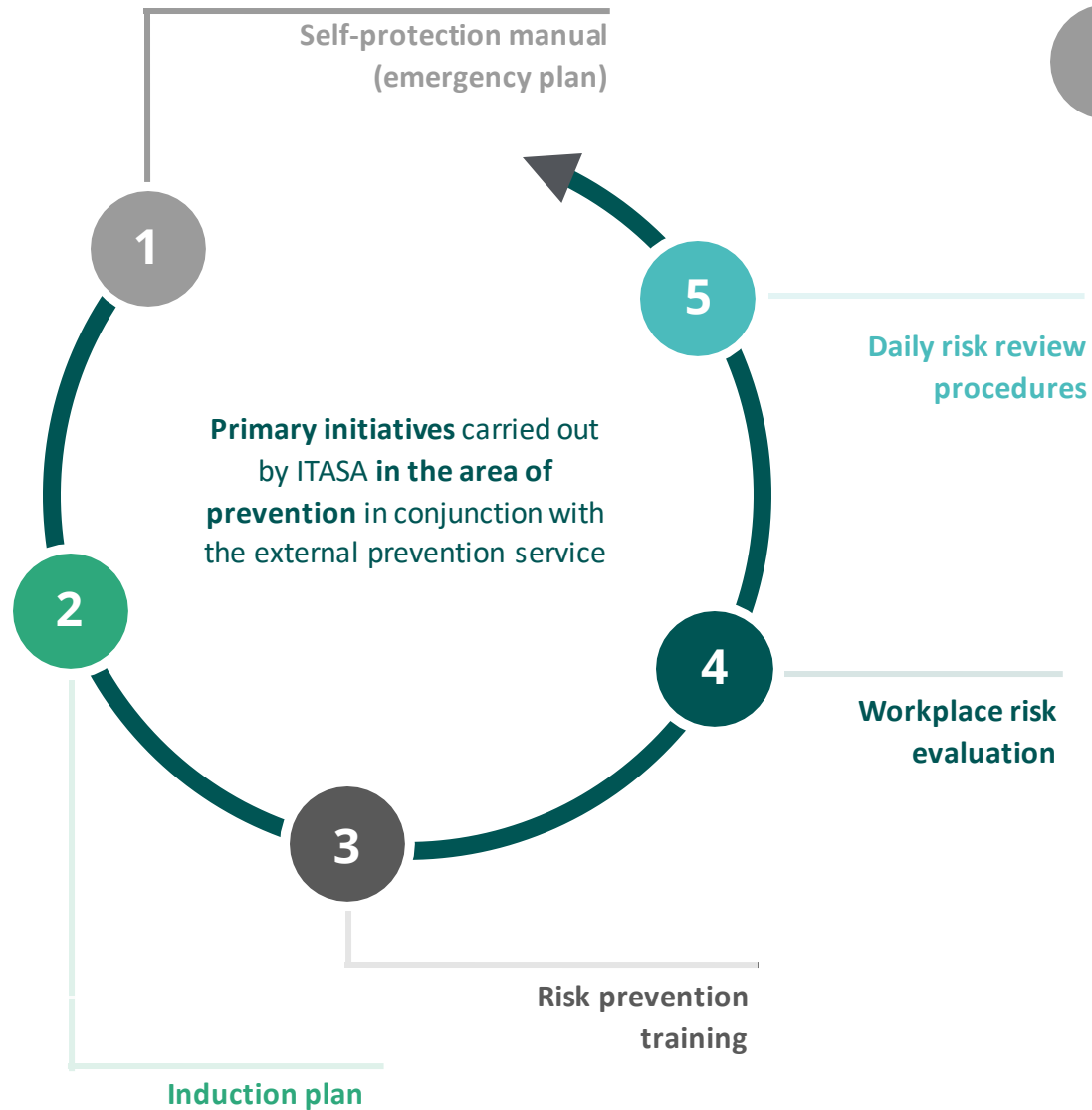
With the same goal of supervising and monitoring health and safety, at the Andoain plant we have an equivalent **Health, Safety and Environmental Committee** that meets quarterly to evaluate risks, monitor the figures and indicators, design and implement the necessary measures and evaluate the information obtained by the **external prevention service** they work with. Likewise, they set up extraordinary meetings to handle specific issues whenever they deem it appropriate. All the actions undertaken by the service are described in the annual report, and they include the workplace safety, industrial hygiene, ergonomic and psycho-sociology and health monitoring modalities.

The primary initiatives carried out by ITASA alongside the external prevention service in the area of prevention are the following.

- ❑ Implementation of an **induction plan**
- ❑ Implementation of the daily risk review procedures to eliminate the greatest possible number of risks in our jobs and workplace in the most efficient and permanent way possible
- ❑ Implementation of the VELOCITY and HUMANTECH tools
- ❑ Creation and implementation of the **self-protection manual (emergency plan)**
- ❑ Risk prevention training
- ❑ Workplace risk evaluation



# Measures Aimed at Ensuring Prevention



1

## Creation and implementation of the self-protection manual (emergency plan)

The self-protection plan for the company was created in 2016 and registered with the Basque government. After three years, in 2019, the self-protection plan was reviewed and updated and the Basque government was notified again.

The update was done in 2022.

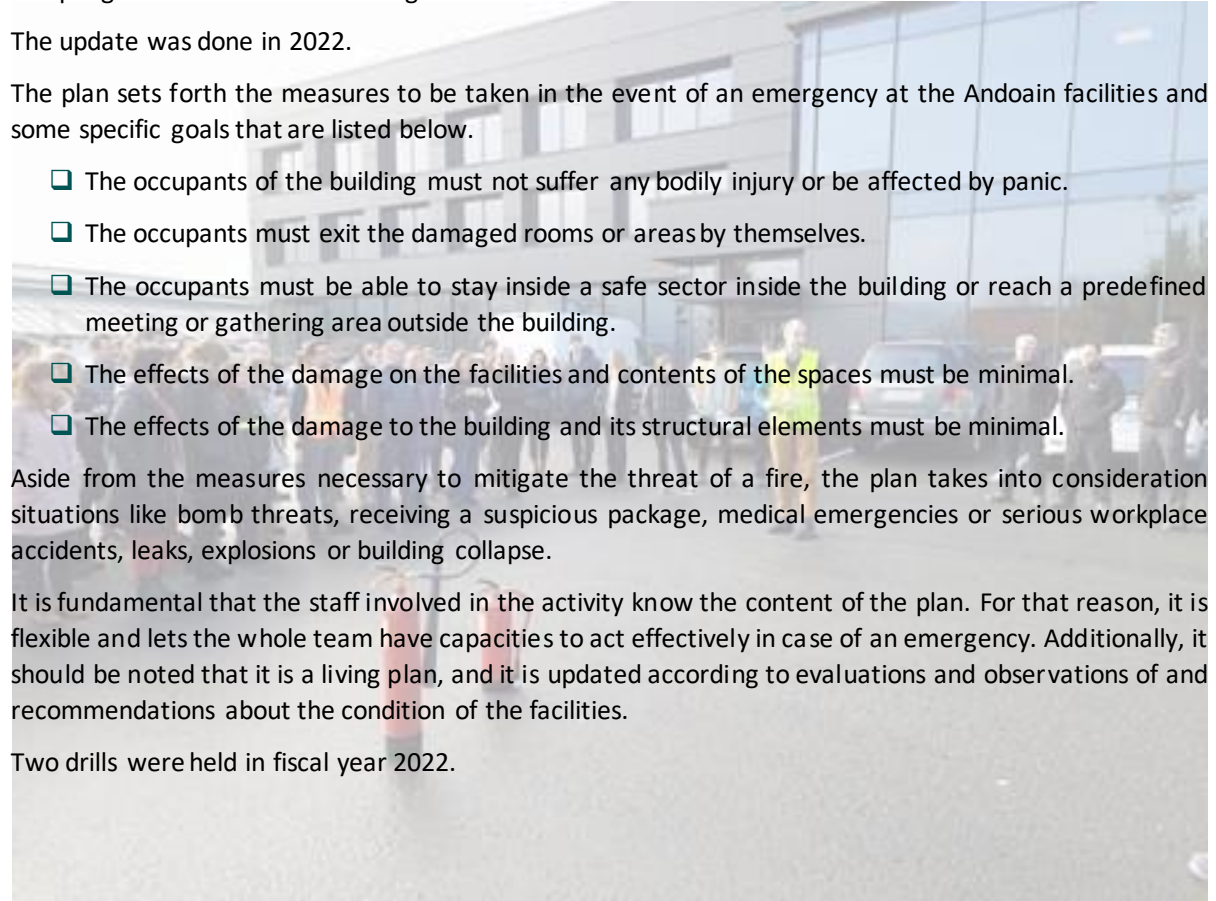
The plan sets forth the measures to be taken in the event of an emergency at the Andoain facilities and some specific goals that are listed below.

- The occupants of the building must not suffer any bodily injury or be affected by panic.
- The occupants must exit the damaged rooms or areas by themselves.
- The occupants must be able to stay inside a safe sector inside the building or reach a predefined meeting or gathering area outside the building.
- The effects of the damage on the facilities and contents of the spaces must be minimal.
- The effects of the damage to the building and its structural elements must be minimal.

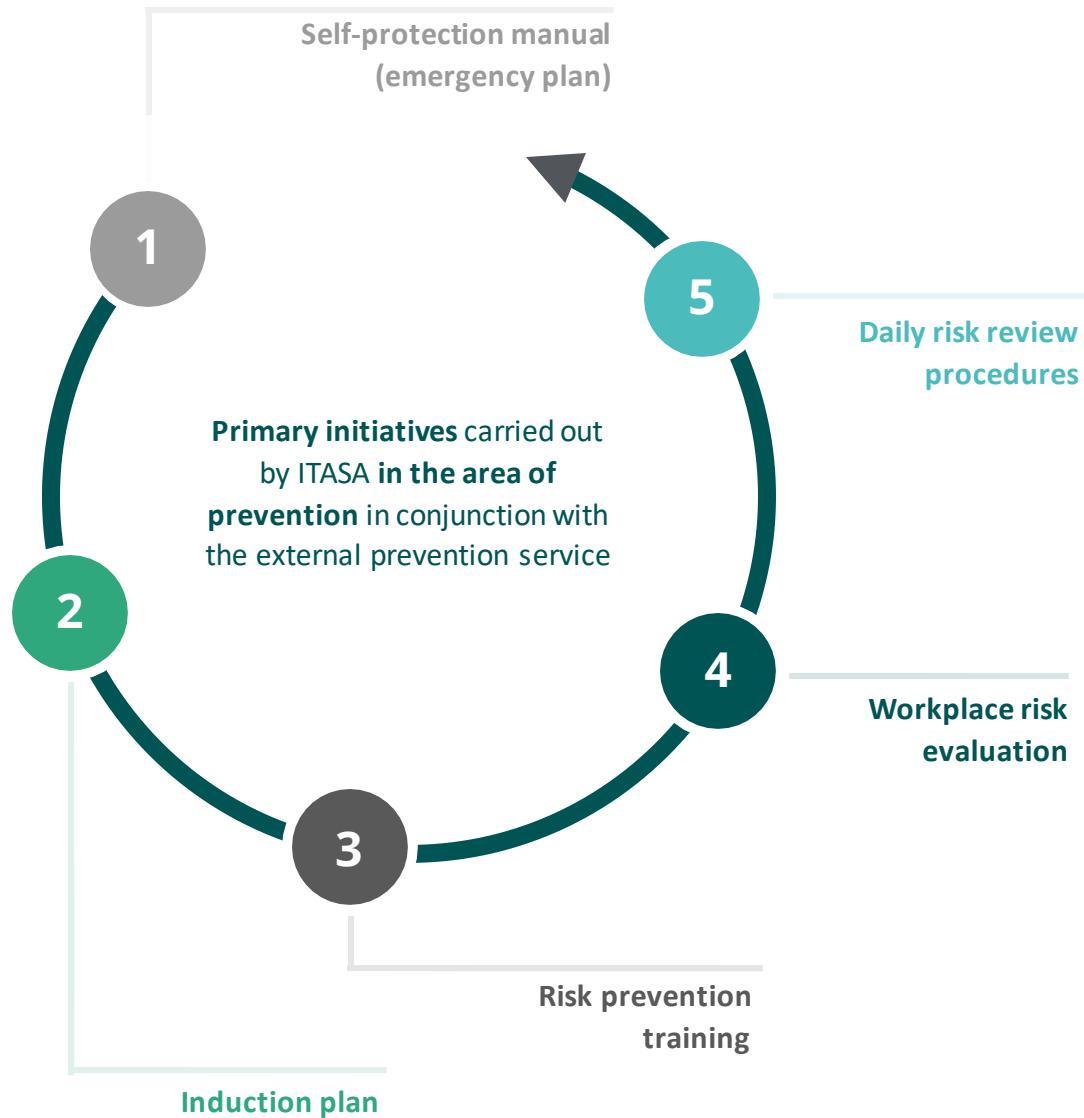
Aside from the measures necessary to mitigate the threat of a fire, the plan takes into consideration situations like bomb threats, receiving a suspicious package, medical emergencies or serious workplace accidents, leaks, explosions or building collapse.

It is fundamental that the staff involved in the activity know the content of the plan. For that reason, it is flexible and lets the whole team have capacities to act effectively in case of an emergency. Additionally, it should be noted that it is a living plan, and it is updated according to evaluations and observations of and recommendations about the condition of the facilities.

Two drills were held in fiscal year 2022.



# Measures Aimed at Ensuring Prevention



2

## Implementation of an induction plan

Every worker who enters the company receives initial information about the risks of their normal job and an induction medical exam is attached. They are given the company's induction manual, the appropriate PPE is given to them, and they are given some initial prevention instructions, all of which is recorded.

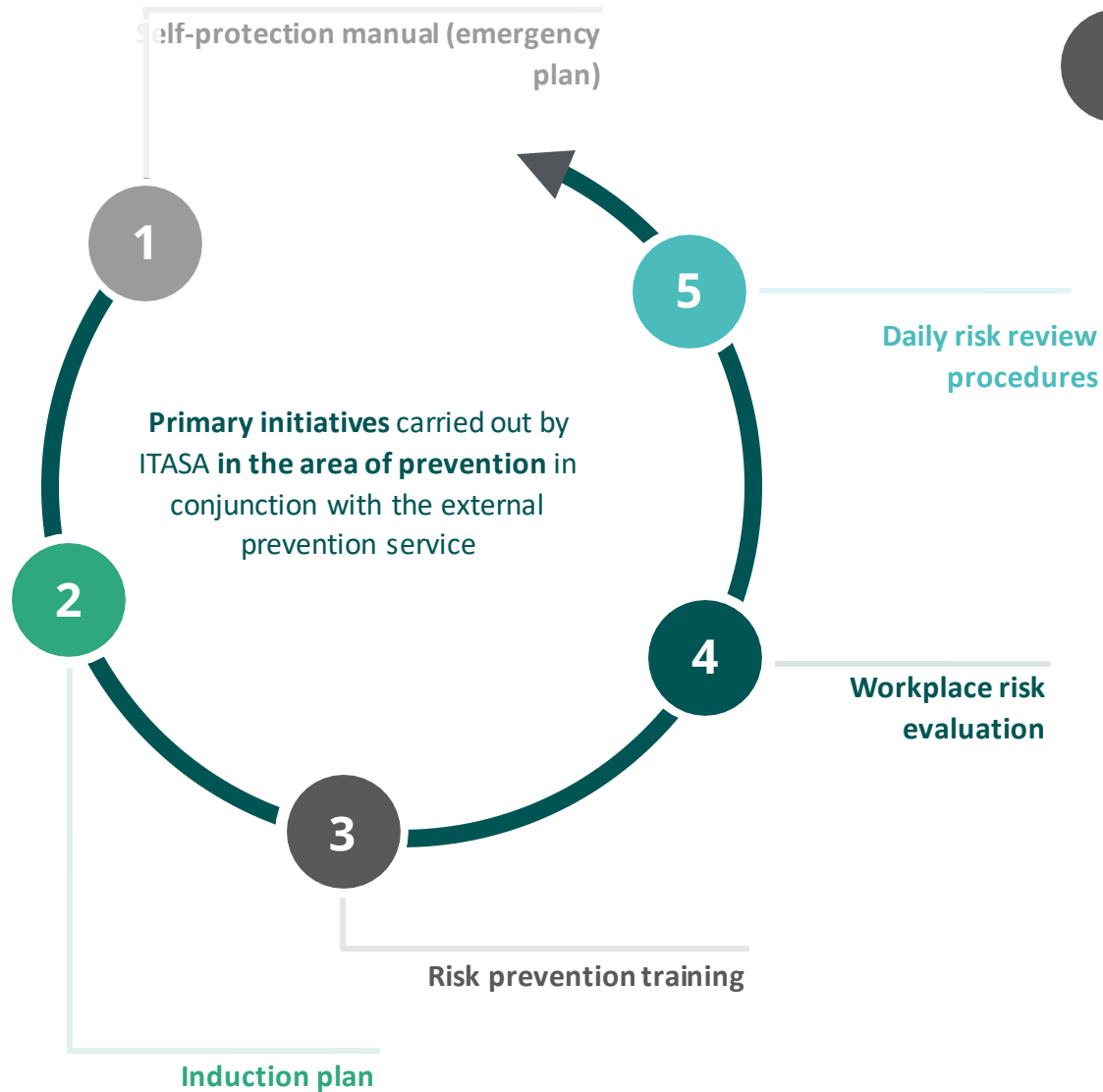
## Daily Risk Review Procedures

The general goal of ITASA is to eliminate the greatest possible number of threats in our jobs and workplace in the most efficient and permanent way possible, making use of the unique capacity of the front line leaders to create expectations and drive improvements. That practice reinforces MATIV's commitment to safety as the most important value.

Specifically, the daily risk reviews create a frequent, consistent and proactive process for the leaders to:

- Detect risks and involve potentially affected employees in solutions for controlling risk
- Creating specific actions to take on the most persistent risks in the workplace and employee's or subcontractor's potential exposure to those risks
- Provide positive reinforcement to the front line employees for their decisions, actions and contributions to a zero-incident culture, and do it through authentic and contextual situations working on the line.

# Measures Aimed at Ensuring Prevention



3

## Risk Prevention Training

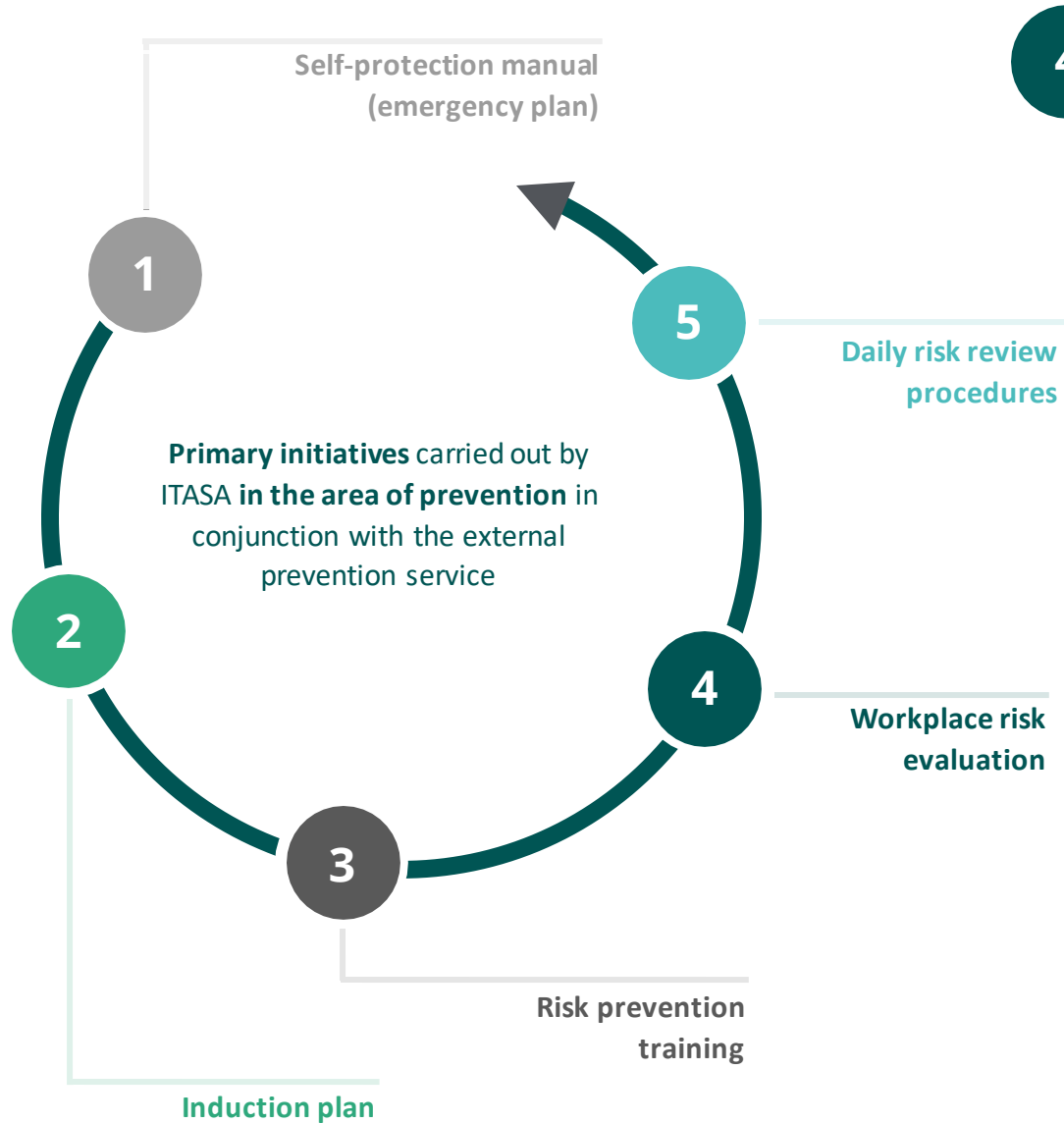
In fiscal year 2022 a number of training activities were done at ITASA aside from the new hires, such as:

- Forklift truck operator training External training
- Basic risk prevention training, external training
- First aid External training
- Training in how to act in different emergencies Internal training
- Training in safety culture Continuous internal training
- Training in work at height with a lifeline Internal training
- Training in loading - unloading hazardous materials Internal training
- etc.

Photos of first aid training, for example



# Measures Aimed at Ensuring Prevention



## 4 Workplace risk evaluation

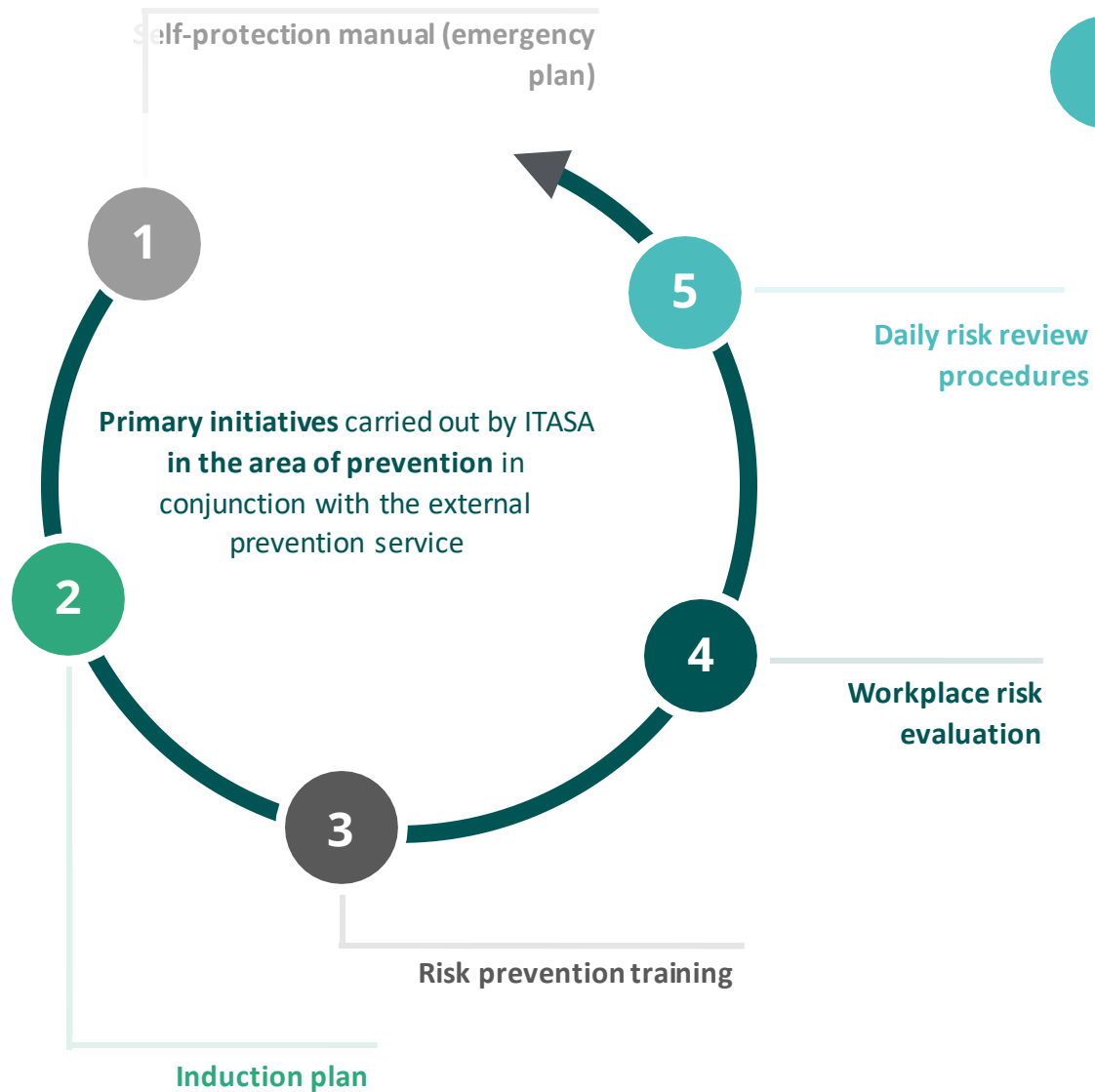
Accompanied by the external prevention service, in recent years at ITASA we have done an evaluation of occupational risks that has been updated and reviewed since then because of accidents that have happened, and internal and external audits, among other reasons. The identification and evaluation of risks was updated in the 2022 fiscal year.

In regards to the audits mentioned above, it should be highlighted that at ITASA's Andoain plant we have **ISO 45001 occupational health and safety management system certification**. And we have **internal and external audits** done by the external prevention service with the goal of detecting exceptions or risks that need to be mitigated within a short time frame. As evidence of those inspections, the staff involved issue a report to make a written record of the scope of the review and the incidents found, even backed by evidence or graphics to facilitate subsequent analysis and comprehension.

The audit of the renewal of the occupational health and safety management system certification was done in fiscal year 2022, which confirmed the implementation of the system in regards to the specific requirements of the ISO 45001:2018 reference specification.



# Measures Aimed at Ensuring Prevention



## 5

### Daily Risk Review Procedures ITASA Andoain

The following goal is very important to ITASA.

*“ELIMINATE RISK IN OUR WORKPLACES IN A SYSTEMATIC AND PERSISTENT WAY IN PURSUIT OF A ZERO-INCIDENT CULTURE”*

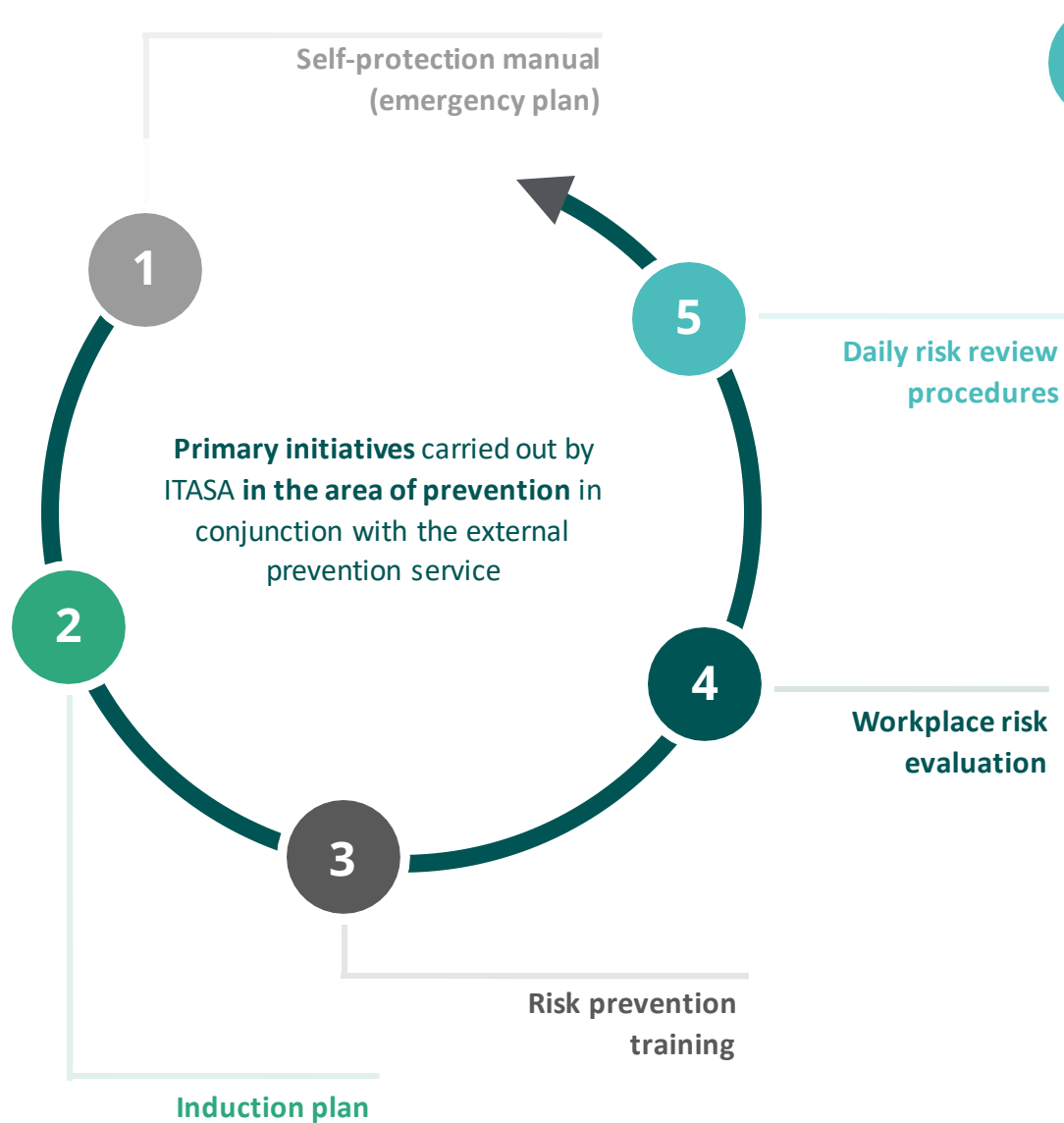
The daily risk reviews are managed in communication forums created by ITASA, which are the DAILY GEMBA WALKS.

On the GEMBA walk, communication between the members of the team is ensured to be in real time and that it is done following a routine (every shift of every production working day), and that it provides a chance to do the risk reviews effectively.

In the GEMBA meetings, the team reviews risk in three possible scenarios every day.

1. A task or project during the day's shift that has excessive risk and justifies a discussion and evaluation (Hi-Po task)
2. An evaluation of formal risks, like an ergonomic risk assessment (ERA) or a job safety analysis (JSA), which is normally done as a team or by several individuals on a machine, device, process or specific part of a process or work task or tasks
3. Commitment to leader learning engagement (LLE), conversations with plant workers, to investigate by experts, to reduce risks in the area and develop workers' capacity as part of a planned review of daily management /Managing Daily Improvement

# Measures Aimed at Ensuring Prevention



## 5

### Daily Risk Review Procedures (Daily Risk Review) ITASA MÉXICO

At the Mexico Plant

The daily risk reviews are managed in communication forums created by ITASA, which are the DAILY GEMBA WALKS and high-risk job permits.

On the GEMBA walk, communication between the members of the team is ensured to be in real time and that it is done following a routine (every shift of every production working day), and that it provides a chance to do the risk reviews effectively.

For the high-risk job permits they are focused on suppliers and subcontractors, because the Mexico plant is in the process of expanding, which is functional for the building project and arrival of new machinery.

In the GEMBA meetings, the team reviews risk every day in the following way:

1. For a task or project during a day's shift that has excessive risk a pre-task risk assessment (PTRA) is done using form EHS 6.1.01-03 level A attached to the job permit.
2. An evaluation of formal risks, like an ergonomic risk assessment (ERA) or a job safety analysis (JSA), which is normally done as a team or by several individuals on a machine, device, process or specific part of a process or work task or tasks
3. Commitment to leader learning engagement (LLE), conversations with plant workers, to investigate by experts, to reduce risks in the area and develop workers' capacity as part of a planned review of daily management /Managing Daily Improvement

# Our Main Figures

Our Health and Safety Committees at the two main ITASA plants monitor the following figures and indices (\*).

Indicators	2022	
	Men	Women
Accidents with missed work	5	-
Frequency index	16.53	-
Seriousness index	0.86	-
Occupational diseases	0	-

In collaboration with the external prevention service we have hired for the Andoain plant, the **prevention activities plan for fiscal year 2023 has already been presented**, such that, committed to continuous improvement and the management system implemented in the plant, we keep developing initiatives and actions to safeguard the protection and care of all the human capital that makes up ITASA.

Insofar as our company ITASA Américas, S.A. de C.V., at the end of fiscal year 2020 the level of **psycho-social** risk perceived in the workplace was analyzed, and the organizational environment and identity collaborators subject to severe traumatic events was evaluated, in compliance with **NOM-035-STPS-2018**, which is applicable in the entire country and that defines psycho-social risks in the following way.

***“Risks that can cause non-organic anxiety, sleep/wake cycle and severe stress or adaptation disorders derived from the nature of the job functions, the kind of working day and exposure to severe traumatic events or acts of violence in the workplace to the worker for their job”***

The conclusions reached by that study by an independent external reviewer have been shared with ITASA management with the goal of designing and implementing measures that promote and ensure the prevention of those risks.

(\*) The following formulas were used for calculating the indices.

Frequency Index: the number of accidents with missed work during the workday per million hours worked

Seriousness Index: the number of missed work days per thousand hours worked



# ***Protecting Human Rights and Zero Tolerance for 7 Corruption***

**“Consolidating our culture of compliance and ethical principles”**

# Iron clad ethical principles as a keystone

ITASA's position of excellence is the outcome of many years of effort and work. Nevertheless, inappropriate behavior by any manager, employee or person can seriously and immediately damage our image and reputation. Because of that, at the company we want to actively prevent and avoid that possibility through consolidating our culture of compliance in all areas of the organization.

**Thus, with the firm commitment to preserving our ethical principles, we have made implementing a solid corporate culture of integrity and transparency, where ethical values and complying with regulations are central elements of our business model and decision-making, a high-priority goal.**

To those ends, it is very important that all members of ITASA (administrators, directors, business partners - directly or indirectly controlled third parties - and employees), regardless of our geographical or functional location, carry out our activities with the **firm commitment to comply with the laws and regulations in force**, as well as the ethical values and principles in our **code of conduct**, our policies and all the internal procedures and controls that may be applicable.



# Our Rules for Behavior

It should be noted that the code of conduct is given to all employees when they are hired, in the induction plan, to ensure that they are aligned with the principles we promote and that they adopt the following rules for behavior.



## Responsibility for ITASA's reputation



Our reputation depends on large part on the behavior, actions and decorum of each one of our employees. Inappropriate behavior by a single employee may cause irreparable damage. Each one of us will take care to not harm the good name of ITASA while doing our job.



## Responsibility for basic social rights



We respect human rights and promote respect for them. We accept the provisions of the International Labour Organisation, and we recognize the basic right of employees to form unions and associations to represent workers. We deplore the deliberate practice of forced or compulsory labor and, of course, we prohibit child labor. We respect the minimum legal age for work determined by the laws of every country.

Salaries and benefits paid or granted in another way as remuneration for an ordinary work day will match at least the legal minimum wage or the standards for the corresponding geographic area.



## Equal opportunities and mutual respect



ITASA ensures equal opportunities and treatment regardless of a person's ethnic group, skin color, gender, disability, ideology, religion, sexual orientation, social status or political ideology, whenever equality is based on democratic principles and tolerance for people with opposing opinions or from different groups.

As a principle, employees are chosen, hired and promoted based on their skills and merits.

All our employees, without exception, are forbidden from engaging in any kind of discrimination against their colleagues, either slandering, harassing or persecuting anyone. And they must strive to maintain relationships with respect and camaraderie.



## **Workers and Their Representatives**



We expect our workers to provide a good level of work, performance and health. The company helps participative workers with their personal development.

Along those lines, we maintain trustful and honest relationships with workers' representatives that are aimed at maintaining a constructive dialog and striving for an equal balance of interests. Working with workers' representatives who combat both privileges and discrimination is part of our corporate culture.



## **Management Collaboration and Culture**



Every manager is responsible for their workers, who they will strive to have a relationship of mutual respect with. Every upper manager (coordinator) must be an example to follow, so they must follow the code of conduct strictly. When providing periodic information and instructions about the responsibilities and skills for every area of work, the coordinators promote suitable behavior among their employees. A good coordinator trusts their workers, sets ambitious and realistic goals, and gives workers as much freedom and responsibility as possible. A good coordinator also knows how to see and acknowledge the merits of the employees under them. Excellence will get special recognition.

In the context of the responsibility leadership involves, coordinators will do everything possible to avoid unacceptable behavior. They will be responsible, within the scope of their purview, for ensuring that infractions are not committed that could have been avoided with adequate supervision.

Trust and cooperation are shown by the mutual and open exchange of help and information. The coordinators and employees will inform each other about all issues regarding the company, so they can make decisions and act in consequence.

Specifically, employees and their coordinators must ensure rapid and efficient exchanges of information. Knowledge and information will be transmitted under the conditions established by the respective authorization scope. To facilitate cooperation, information and knowledge will be communicated without falsification, in their entirety and as soon as possible.

# Fundamental Principles of the Compliance Model

In this context, we have designed a legal risk prevention compliance model to detect, prevent and react to those risks. The reference framework for the model can be found in the [compliance policy](#) and the [compliance manual](#), which were both approved in fiscal year 2018, and that are based on the following fundamental principles.

## Legal compliance

Respect for the law and zero tolerance for committing illicit acts is one of ITASA's fundamental principles, a high-priority and inexcusable duty of all staff is to follow the laws in force and adhere to the company's internal regulations.

## Continuous improvement

All staff, and especially employees in positions of responsibility, must continuously promote and participate in the processes defined in relation with the compliance model.

## Equality and respect for people

ITASA promotes and encourages a work culture and environment in which their employees treat each other with respect, courtesy and equity, to promote equal opportunities for everyone.

## Integrity and objectivity in business activities

ITASA has defined the basis of common ethical behavior for all their employees so that they clearly understand the meaning of ethics and professional integrity.

## Protecting health and physical integrity

The company makes an effort to create a safe and healthy work environment that contributes to achieving personal and professional goals and avoiding any circumstances or behavior that is troublesome or toxic for others.

## Protecting the environment

ITASA acknowledges that its business activities may, on occasion, affect the environment. Consequently, they work to reduce the toxic effects that may be caused.

## Efficient management

ITASA is a competitive company that actively works to improve their internal management.

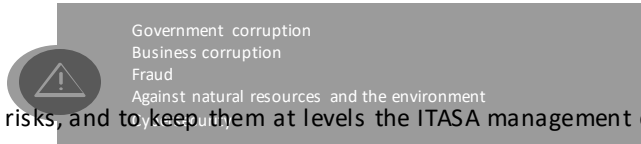
## Use and protection of information

At ITASA, measures are taken to safeguard and protect confidential information.

# Evolving Towards a More Robust Model

Aware of the importance of doing an exhaustive analysis of the civil code and the potential crimes defined in it, at ITASA we have created a **legal risk and control matrix** with the goal of prioritizing the risks that are most relevant for us and the level of management we have implemented.

In that context, it should be highlighted that, **inherently**, the primary risks we are exposed to are:



To mitigate those risks, and to keep them at levels the ITASA management can tolerate, every day we work to keep the preventive and detection monitoring systems and measures we have designed completely operative and functional.

It must not be forgotten that, in order to be able to reach this goal, we need to **make our team aware** of its importance so that the culture of compliance and risk management takes root in the organization. Our staff are the fundamental pillar on which this model rests.

As a consequence, it should be mentioned that in the 2022 fiscal year **training** was received by the collective of employees who are part of the indirect workforce, mainly, to remind them of the fundamental principles and aspects of the model and to present the code of conduct, policies and manuals of **Mativ** that we are part of.

The Neenah Group merged with the SWM corporation in May 2022, from which MATIV emerged. The code of conduct and corporate compliance model of Neenah was in force during that period. The new Mativ code of conduct was published in March 2023. All Mativ employees must be appropriately informed and trained in it during 2023.

It should be noted that, despite the two models currently coexisting because of ITASA's recent integration into the group they are completely aligned and focused on complying with the applicable laws and regulations and on the ethical principles, policies and internal procedures. It is normal that there is an adaptation of the corporate model of the parent company to the local rules and characteristics to ensure that all minimum content areas are covered.

In this framework, it should be noted that Mativ has an operative **complaints channel** available to their stakeholders. They have an **ethics direct line procedure** that includes the following avenues for filing any questions, complaints or messages.

1. The Mativ corporate website
2. A telephone call
3. A letter to one of the email addresses included in the procedures
4. Email
5. in person

Additionally, in the sphere of corruption, Mativ has designed a **statement of compliance with the Foreign Corrupt Practices Act** (hereinafter FCPA) of 1977, with its amendments, by which it is confirmed that neither Mativ nor any party that works in the name of Mativ will make corrupt payments directly or indirectly:

1. To any official or employee of (a) any federal, regional or local government of any country; (b) any governmental agency or state owned or controlled company or (c) any international public organization ("official"):
2. or any (a) political party or any official of a political party or (b) candidates for public office ("undisclosed third party").
3. Consequently, Mativ requires all employees and agents, consultants and representatives to comply with Mativ's FCPA policy.

No complaints were received through the complaints channel in the 2022 fiscal year.

# Other Critical Compliance Models for the Group



Our parent company is located in the US, which is why ITASA is subject to certain obligations associated with United States rules and regulations.

The **Office of Foreign Assets Control** (hereinafter OFAC), which describes US sanctions, laws and regulations that are applicable to Mativ. A **compliance program** has been developed for that purpose that states our commitment to carry out our commercial activities with honesty and integrity and in full compliance with the laws and regulations of the United States that govern international commercial activities.

Mativ expects their employees, managers, agents and directors, wherever they are located, to adhere to the company's commitment to compliance.

The OFAC regulations forbid participation in transactions or providing services to sanctioned countries, people or organizations. The sanctions are an extension of US foreign policy and national security goals. Consequently, compliance limits damage to US national security and foreign policy goals.

Likewise, Mativ has shared a **statement of compliance with the General Data Protection Regulation (GDPR) and privacy policy** with ITASA and the rest of the companies that make up the Group in order to describe and explain our data collection practices and our commitment to the data security of our employees, clients and other people with interests in our business to users.

lastly, in response to various fraud cases, the US published **the law known as SOX (Sarbanes- Oxley)** in 2002, which centers on implementing and supervising internal monitoring of processes that affect the accuracy of our financial statements and protecting assets. It also includes tests for the internal auditing to be done every year. In the 2002 fiscal year, the design and implementation phase was concluded satisfactorily. Additionally, for the first year Itasa has undergone internal and external audits of the tests implemented.



## **8 Commitment to the local area and community**

**“We believe in creating wealth and employment to benefit our society.”**

# Our Relationship with Society

“We are committed to our local area, and we believe in creating wealth and employment to benefit our society. That is reflected in the following SDG:



**Goal 10** intends to reduce inequality in countries and between them.  
**Target 10.2** intends to strengthen and promote social, economic and political inclusion for everyone.

Our contribution at the Andoain plant is materialized through **agreements with companies/entities** that have **support programs** for social inclusion at all levels. And we do monitoring using the following indicator.

Indicators	2019	2020	2021	2022
People hired	0	1	1	0

In the 2020 and 2021 fiscal years that collaboration was materialized through the agreement with the Red Cross, **Cruz Roja RESPONDE plan**, however this year nothing has been included.

At ITASA we want to bring the world of work and business to universities and their students. That is why through agreements with the Universidad de Deusto and the Don Bosco Paper School, we had students do internships in the 2020 and 2021 fiscal years. We believe this kind of relationship is necessary to create bonds with students, and so they can acquire work experience at a solid industrial company like ours. And so the universities and training schools can become familiar with the market and the needs we currently have.

Likewise, our contribution to society can also be seen in our membership in several **associations** related with our business activities, and our desire to be a leader in the industries we are involved in. The most relevant ones are shown on the list below.

- ADEGI:** Business Association on Gipuzkoa
- FINAT:** European Association for the Self-Adhesive Label Industry
- Paper cluster**
- AFERA:** European Adhesive Tape Association
- CELAB:** Association for a sustainable self-adhesive labeling industry
- IRLA:** International Release Liner Association

Lastly, all our sponsorships and donations for social issues are a part of our business strategy, and they are based in responsibility to our local area and the identity of ITASA. Donations have been made to the **Asociación contra el Cáncer (Spanish cancer society)** and **Euskalduna de Andoain soccer club**.



# Responsible supply chain

Insofar as our relationship with our suppliers, as one of our important external stakeholders, we have created **purchasing procedures** that shows the flow followed by ITASA and the main milestones to consider, as well as the specific handling for FSC and PEFC materials acquisitions where, prior to purchase, we carried out certain additional verifications in accordance with the commitments we made in our integrated management policy (mentioned in previous sections of this document).

In regards to **FSC materials acquisitions**, in order to confirm any change that may affect the availability and authenticity of the products supplied, at Itasa we actively verify the validity and scope of the certified product groups from the suppliers using the FSC certificate database ([info.fsc.org](http://info.fsc.org)).

Following that way of working, insofar as **PEFC material acquisitions**, at Itasa we verify that suppliers are certified based on the validity and scope of the certificate and by verification using the public registries maintained by the PEFC council, or any other recognized organization ([pefc.org](http://pefc.org)).

Likewise, for our two ITASA plants we have designed a continuous **selection, certification and evaluation procedure** for our suppliers that aims to define and align the method used to ensure our suppliers have the capacity to supply products and services with the requirements called for, including ones associated with quality and the environment and meeting legal requirements.

Our certification process has the direct involvement of the environmental and quality department, that are in charge of doing the initial evaluation of suppliers and subcontractors. They contact suppliers, in the first place, to inform them about the required quality and environmental process and, secondly, to ask them for the certificate for the quality or environmental management system they have implemented or associated documentation that provides evidence that they are in the process of obtaining it.

After receiving the information, the suppliers are classified based on a series of criteria defined at different levels. And the following steps to follow subsequently have been established. For certain critical suppliers, at ITASA an audit for the certification is done by our quality department.

Among other sources, the certification process is fed by our experience with those suppliers in the past. It is thus fundamental to have a continuous evaluation system that lets us have bilateral communication with our suppliers to create long-term relationships of trust and work together to obtain products and services that meet ITASA's expectations and that create added value for our suppliers. The primary indicators that are considered in this process involve the percent of returns, and the number of claims and complaints and non-conformances (quality, environment, safety), and delays in deliveries.

All these measures are aimed at achieving maximum excellence, commitment to quality, the environment and safety and our orientation towards service and creating value from our supply chain to our clients.

It should be highlighted that at both the Andoain and Querétaro plants we have **ISO 9001 quality management system certification** issued by an independent expert that demonstrates our commitment to following best practices for business.

# Fiscal Transparency and Communication with Public Authorities

At ITASA we are aware of the impact good fiscal management has on the economic stability of the countries and local populations where we operate. We try to ensure the taxes paid by the Group have an appropriate relationship with the structure and location of its business activities, the human and material resources, and the business risks involved.

We are likewise committed to fluid and continuous communications with the public administrations we operate with, to ensure compliance with the applicable laws and regulations.

In the interests of showing transparency, our main figures for the 2022 fiscal year, distributed by country, are shown below.

<b>Profits Before Taxes (thousands of Euros)</b>	<b>2022</b>	<b>2021</b>
<b>Spain</b>	17,993	8,155
<b>Malaysia</b>	-426	-2,227
<b>Mexico</b>	671	1,394
<b>PPA impact and other consolidation adjustments</b>	-18,977	-18,161
<b>Consolidated Profit Before Taxes</b>	<b>-739</b>	<b>-10,839</b>

Insofar as income tax paid per country in fiscal year 2022, we present the following summary table with the information aligned with the cash flow statement of Neenah Spain Holdings and subsidiary companies.

<b>Income Tax Paid (thousands of Euros)</b>	<b>2022</b>	<b>2021</b>
<b>Spain</b>	2,245	2,670
<b>Malaysia</b>	-	-
<b>Mexico</b>	-	-
<b>Total</b>	<b>2,245</b>	<b>2,670</b>

Insofar as subsidies received, as shown in the attached consolidated annual accounts, Industrias de Transformación de Andoain, S.A.U. recorded an income of *400 thousand Euros* in fiscal year 2022 in the “Other operating income - Operating subsidies included in the period results” section of the consolidated profit and loss statement attached.

On the other hand, the same company recorded a balance of non-refundable subsidies in its net equity of *12 thousand Euros* in the “Subsidies, donations and bequests” section of the attached consolidated balance (see note 12.5 of the attached consolidated statement).



## **9 People: Our primary asset**

**“Our people are the essential piece who, with their work and professionalism, contribute to creating value in the Group”**

# Chaperoning New Hires

**“The people who make up ITASA are the essential piece who, with their work and professionalism, contribute to creating value in the Group. For that reason, attracting, developing and retaining talent is one of the main strategic lines of human capital management at ITASA, in order to have the professionals we need to carry out our business activities, so we can reach the growth and development goals set by management.”**

From the time our employees join the workforce at the Andoain and Querétaro plants we do everything possible so they feel like another member of the team with our **induction plan**, mentioned in the **staff hiring and selection procedures**. Those procedures, that lay out the system and steps to follow from the time a hiring need is detected until the position is filled in the Group and the performance evaluation process after the first few months of training, are complemented by the instructions called **“reception”**, the goal of which is to ensure that employees who join ITASA know how we do things and are aware of our basic internal rules. That knowledge is necessary for everyone who works permanently with us, either with a work contract, as an intern, or any other kind of collaboration that entails a prolonged stay in the organization.

One of the documents provided at the time of onboarding, as indicated in the instructions in the **employee manual**, includes corporate and socio-labor information and information associated with the integrated quality, environmental, and health and safety management systems. Likewise, a copy of the code of conduct is delivered, among other documents, so they are aware of our commitment to ethical values and principles, and so our new employees can behave in conformance with them. The whole onboarding process is signed by new employees to show their agreement.

After completing the initial process, at ITASA we are concerned with our team’s commitment. An example of that is how in late 2021 and early 2022 we did a **satisfaction survey** at the Mexico plant in order to design actions and implement the measures needed to improve the well-being of the whole workforce. In 2022 in Américas, a **psychosocial risk measurement survey** was done to ensure the whole workforce had physical, mental and psychological health in relation to their person and to evaluate the level of satisfaction in relation to their working conditions and professional challenges. It was reviewed and validated by the labor authorities, being as it is a regulation all companies in the country must fulfill.



# Promoting Equal Opportunities

In 2020 at Itasa we also started the journey and commitment to equality between men and women as a strategic element of our internal and external management. Equality between men and women is a universal legal principle recognized in numerous international texts about human rights. As a consequence of Spanish organic law 3/2007 of 22 March, at ITASA we are obligated to develop an equality plan for our staff in Andoain. However, our commitment to that plan does not only stem from compliance with the law. Rather it also stems from the opportunity it represents to be able to generate consensus that lets us deepen and optimize our culture based in shared values made clear through our corporate principles and code of conduct, and other directives we have been taking on.

Consequently, our **2021-2024 plan for equality between men and women** is focused as an element that is transversal and for internal improvement. It influences processes, communication and learning, but it is also a driving element and one for external impact among our clients, suppliers and environment. The **Equality Committee**, made up of a mixed team within ITASA, is in charge of tracking its monitoring and updating and auditing it in the future.

Insofar as sexual and gender harassment, at ITASA we do not have a formally documented protocol, but we state our rejection and zero-tolerance stance against situations of that nature. That commitment, among others, can be found in the Mativ and ITASA codes of conduct, the first of which states:

“We treat everyone with fairness, respect and dignity. And we base our work-related decisions on personal merit, experience and aptitude. We never illegally discriminate nor do we discriminate for reasons of race, color, religion, national origin, genetics, genetic information, gender, sexual orientation, gender identity, age, disability, military service, marital status, citizenship or any other condition protected by law.

We do not tolerate any kind of intimidation, aggravation or harassment. That includes actions that create a hostile work environment. Offensive, intimidating or discriminatory behavior has no place at Mativ. One form of harassment is sexual harassment. Sexual harassment includes a series of behaviors that may involve people of the same or different genders. Flirting, undesired sexual insinuations, inappropriate comments about a person’s appearance, sexually explicit or offensive jokes, unnecessary physical contact or any other undesired verbal or physical conduct of a sexual nature are forbidden.

Mativ’s complaint channel is available to all employees to report any related issues.

As can be deduced from this statement in the code of conduct and its equivalent in the ITASA code of conduct, the focus and concern for **equal opportunities is extended to people with disabilities** and certain areas of our facilities have been adapted for accessibility. In any case, as a consequence of our philosophy of continuous improvement, at ITASA we are not satisfied with the results we have obtained, and we are aware that we need to keep working to achieve a higher degree of adaptation and integration that what we currently have for the people with disabilities on staff.

# Committed to Work-Life Balance and Professional Development Measures

At the start of the 2022 fiscal year, employees were notified about the “**ItasaFlex**” initiative, which is a pilot experience aimed at facilitating a better work-life balance through being able to do one work day at home. After the trial period ITASA management evaluated the effectiveness of the measure, and it was decided to permanently implement one Itasa FLEX day during 2022.

These new measures and commitments by ITASA intend to mitigate the primary risks we are exposed to in the area of human resources. The risks include being able to attract and retain talent, being able to provide a professional career and path, providing attractive working conditions in line with the rest of the industry and the competition, the health and safety of our employees and, lastly, managing the social dialog with our unions to reach agreements that are beneficial and advantageous for all the parties involved.

## Training

At ITASA we are committed to talent. Providing a training plan that meets their professional needs and goals is vital for motivating people. Training is a fundamental pillar for cultivating knowledge and experience in our organization. And it has a direct impact on the people who work in the Group, our business activities, products and clients.

Even though we do not have a formal training policy, every year we work on updating the **training plan** for the ITASA staff, which brings together general and specific training activities of different kinds associated with leadership, languages, office equipment, ethics, the environment, health and safety, and other topics.

In the 2022 and 2021 fiscal years, the number of hours of training received by our employees at the Andoain plant (\*), depending on their professional category, were the following.

Professional category	Hours of training 2022	Hours of training 2021
Manager	201	63
Sales Person	64	42
Administrator	724	509
Technician	313	601
Operator	193	16
<b>Total</b>	<b>5,379</b>	<b>1,231</b>

The main causes of the increase in training hours in regards to the previous period are:

- Training in workplace risk due to the increase in shifts at the plant
- Investment in language training
- Investment in office equipment training
- Management team training

(\* ) The Querétaro plant also held training session in the 2022 fiscal year. However, the number of hours is not representative and the management does not have a complete and systematic registry of them. Consequently, those hours have not been included on the table in this non-financial information statement.

# How We Organize and Manage Our Social Relationships in Querétaro



With the goal of maximizing productivity at our Querétaro plant, the **internal work regulations** intend to ensure that work relationships are cordial, organized and disciplined. That is why, in addition to rights and duties of every employee, it regulates the following aspects of the work day.

- ITASA Américas determines the work day and hours subject to the limits set forth in the laws in force, and the employees are obligated to respect them. Variations in the work day or hours will be subject to the needs and policies of the organization, within the legal boundaries.
- Employees must record their presence at the plant four times a day using the tool made available to ITASA for that purpose.
- Staff who, for service needs, must do work outside the ordinary working day must have prior authorization from their immediate supervisor.
- National and regional holidays set by law or by the organization are published on the bulletin boards and agreed upon with the union.
- For unionized employees meal times are 30 minutes and for trusted individuals they are 60 minutes a day.

Likewise, these regulations cover absences and leave, and they complement the agreements reached in the **collective permanent employment contract** signed by the unions and Itasa Américas that establishes, among other things, the following:

- For every six days of work the company must grant two paid days off every week for operating staff and comply with 48 hours a week.
- In the event it is necessary to work outside the workday, it will be considered overtime and it will be paid in accordance with the federal labor law.
- The contractual parties state that the days determined as such under the federal labor law will be obligatory days off. Additionally, the company includes additional days off during Holy Week, the Día de la Virgen de Guadalupe and December 24 and 31.
- Parental leave for mothers and fathers is regulated, as is a nursing period for mothers until the child is one year old.

51% of the employees at the Querétaro plant are covered by the aforementioned collective contract. And the entire workforce has working conditions in line with local laws. And some employees have individual agreements that improve the general conditions or make them more flexible.

# How We Organize and Manage our Social Relationships in Andoain

At our Andoain plant we have a **Company Committee or worker's legal representation committee (RLT in Spanish)** made up of nine members from the CCOO and ELA unions. The ITASA management and the Company committee meet quarterly to discuss the situation of the company. In addition, extraordinary meetings are held when it is deemed necessary for any, primarily social, reason. In the 2022 fiscal year, for example, an agreement was reached by both parties in regards to modifying the current shift scheme to one fifth shift / non-stop in certain plant facilities, the same as an agreement about time keeping in the office collective.

The current collective **bargaining agreement for manufacturing pulp, paper and cardboard in Gipuzkoa covers the 2022 – 2025 period**. The agreement includes all the social and workplace health and risk issues that are applicable to all ITASA employees. As a fundamental issue, it should be highlighted that at ITASA all workers are covered by the aforementioned collective bargaining agreement in Andoain. And, in some aspects, indirect employees have specific conditions that, in any event, are equal to or more flexible or improve the conditions specified in the aforementioned collective agreements (\*).

When determining compensation for our employees, on one hand we take into account a comparative study done annually by the paper sector cluster for direct labor (DL). And, on the other hand, ITASA uses studies outsourced to consultants that, even though they are not updated every year, can be used as a reference for direct labor. Thanks to those two studies, we know that our compensation in every case equals or exceeds the average compensation in our society for roles with equivalent responsibility. At MATIV Corporate HR, work is being done to combine all the salary information for roles to create a benchmark for internal use.



(\*) Employees hired by Industrias de Transformación de Andoain, S.A.U. in foreign countries are not subject to the Gipuzkoa collective bargaining agreement, their employment conditions are regulated and based on the local laws and regulations. All those employees are in doing their jobs in European countries. They are not a significant number for the company or the Group as a whole.

# Employee Distribution at the End of the Period

The team that makes up the Neenah Spain Holdings group at the close of the 2022 fiscal year had 322 people (274 at the end of fiscal year 2021) (\*) and it has the following breakdown.

Employees by sex	2022	2021
Men	248	212
Women	74	62
<b>Total</b>	<b>322</b>	<b>274</b>

Employees by age	2022	2021
< 30 Group	64	55
30-50 Group	200	165
> 50 Group	58	54
<b>Total</b>	<b>322</b>	<b>274</b>

Employees by work day	2022	2021
Full time	311	265
Part-time	11	9
<b>Total</b>	<b>322</b>	<b>274</b>

Employees by country	2022	2021
Spain	200	180
Mexico	122	94
<b>Total</b>	<b>322</b>	<b>274</b>

Employees by professional classification	2022	2021
Upper Management	9	9
Sales Person	9	9
Administrator	75	60
Technician	19	20
Operator	210	176
<b>Total</b>	<b>322</b>	<b>274</b>

Employees by contract type	2022	2021
Permanent	295	255
Temporary	27	16
Fixed duration	0	3
<b>Total</b>	<b>322</b>	<b>274</b>



\* In 2021 we examined 9 months of the period after the Neenah acquisition

(\*) The staff data at the end of the fiscal year does not match the data in the consolidated annual accounts attached for seven employees who have been hired by the Itasa Asia Sdn. Bhd. company and whose data is outside the scope of this non-financial information statement. Nevertheless, it should be noted that staff hired by the Global Release Liners, S.L.U. company, even though they are not significant quantitatively, they are members of the Group, so they must be included.

# Staff Changes During the Period

In the 2022 fiscal year, the average workforce was 299.41 people who are distributed in the following way according to their workday and kind of contract.

2022	Permanent		Temporary	
	Full time	Part-time	Full time	Part-time
<b>Average employees by sex</b>				
Men	211.53	0.00	13.90	2.93
Women	65.19	3.04	2.69	0.13
<b>Total</b>	<b>276.72</b>	<b>3.04</b>	<b>16.59</b>	<b>3.06</b>

2022	Permanent		Temporary	
	Full time	Part-time	Full time	Part-time
<b>Average employees by age</b>				
< 30 Group	49.95	0.00	5.44	0.40
30-50 Group	178.30	2.16	10.65	0.13
> 50 Group	48.47	0.88	0.50	2.53
<b>Total</b>	<b>276.72</b>	<b>3.04</b>	<b>16.59</b>	<b>3.06</b>

2022	Permanent		Temporary	
	Full time	Part-time	Full time	Part-time
<b>Average employees by prof. category</b>				
Upper Management	9.00	0.00	0.00	0.00
Sales Person	9.00	0.00	0.00	0.00
Administrator	64.26	1.41	1.68	0.53
Technician	19.48	0.00	0.00	0.00
Operator	174.98	1.63	14.73	2.53
<b>Total</b>	<b>276.72</b>	<b>3.04</b>	<b>16.59</b>	<b>3.06</b>

2021	Permanent		Temporary	
	Full time	Part-time	Full time	Part-time
<b>Average employees by sex</b>				
Men	189.1	0.7	9.2	0.8
Women	47.3	3.0	1.9	0.4
<b>Total</b>	<b>236.4</b>	<b>3.7</b>	<b>11.1</b>	<b>1.2</b>

2021	Permanent		Temporary	
	Full time	Part-time	Full time	Part-time
<b>Average employees by age</b>				
< 30 Group	41.5	0.7	4.4	0.4
30-50 Group	145.1	2.2	6.7	0
> 50 Group	49.8	0.9	0	0.8
<b>Total</b>	<b>236.4</b>	<b>3.8</b>	<b>11.1</b>	<b>1.2</b>

2021	Permanent		Temporary	
	Full time	Part-time	Full time	Part-time
<b>Average employees by prof. category</b>				
Upper Management	9.4	0	0	0
Sales Person	8.0	0	0.7	0
Administrator	48.8	2.1	1.9	0.4
Technician	18.9	0	0.2	0
Operator	151.3	1.6	8.4	0.8
<b>Total</b>	<b>236.4</b>	<b>3.7</b>	<b>11.2</b>	<b>1.2</b>

# Staff Changes During the Period

On the other hand, and as a result of the normal adaptations of the staff to the production process at the Querétaro plant, the number of terminations during the fiscal year was the following.

Terminations by sex	2022	2021
Men	17	17
Women	7	2
<b>Total</b>	<b>24</b>	<b>19</b>

Terminations by age	2022	2021
< 30 Group	16	11
30-50 Group	8	6
> 50 Group	0	2
<b>Total</b>	<b>24</b>	<b>19</b>

Terminations by professional classification	2022	2021
Administrator	3	2
Operator	19	17
Technician	2	0
<b>Total</b>	<b>24</b>	<b>19</b>



# Committed to Competitive Compensation

The average compensation depending on the kind of workday for each worker was 27 thousand Euros. The average salary for upper management is excluded and will be itemized separately in accordance with Spanish law 11/2018.

Average compensation by sex	2022	2021*
Men	28,700	25,909
Women	21,429	21,457
<b>Average compensation</b>	<b>26,742</b>	<b>24,962</b>

Average compensation by age	2022	2021*
< 30 Group	9,616	8,786
30-50 Group	30,635	34,891
> 50 Group	44,614	50,122
<b>Average compensation</b>	<b>26,742</b>	<b>24,962</b>

Average compensation by professional classification	2022	2021*
Sales Person	126,633	87,675
Administrator	24,053	19,747
Technician	51,281	35,046
Operator	22,619	22,113
<b>Total</b>	<b>26,742</b>	<b>24,962</b>

In accordance with the average compensation, the wage gap at ITASA is 25%, calculated as the difference between the average compensation for women and men divided by the average compensation for men, excluding the upper management category because it has different requirements.

The salary difference shown in the results has an explanation in a key factor, which is the greater seniority of men in regards to women due to the former's greater inclusion in the workforce historically, which has been gradually neutralizing and reversing. This phenomenon is even greater in a predominantly industrial sector like ours. In any case, it should be noted that our compensation policies are egalitarian and aligned with the collective bargaining agreements in force at every plant. And, consequently, no discriminatory differences or differences to reevaluate have been found.

Below, we will itemize the average compensation data for the upper management that was part of our group in the 2022 fiscal year.

Average compensation by sex	2022
Men	195,820
Women	94,600

On 31 December 2022, there were no advances or credits to upper management staff members, nor were there obligations taken on by them as securities.



# 10 *Subsequent Events*

# Subsequent Events

Between the end of the 2022 fiscal year and the drafting of this non-financial information statement, there were no additional significant events not mentioned in the sections that make up the document.





# **11** *Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)*

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)



The requirements that must be met under Spanish law 11/2018 of 28 December and their corresponding association with the Global Reporting Initiative (GRI) reported by ITASA are presented in detail below.

	General Matters	Reference framework	Section	Comments
Business model	Brief description of the group's business model	2-1-a Organizational details (legal name)	1. Introduction	N/A
		2-6-b-i Activities, value chain and others Commercial relationships (the organization's activities, products and services and markets served)	2. About Us	N/A
		2-1-c Organizational details (location of headquarters)	N/A	Barrio Sorabilla nº 218, Andoain, Guipúzcoa
		2-1-b Organizational details (type of ownership and legal structure)	2. About Us	N/A
		2-7 Employees	2. About Us 9. People: Our primary asset   Staff distribution at the close of the fiscal year	N/A
		2-2 Entities included in the presentation of sustainability reports	1. Introduction	N/A
		2-3 Reporting period, frequency and contact point	1. Introduction	N/A
Reporting framework	Reporting framework	3-2 List of material topics	3. Building long-lasting relationship with stakeholders	N/A
Management Focus	Policies the group applies, that include due diligence procedures applied to identifying, evaluating, preventing and attenuating risks and significant impacts, and verification and control, as well as the measures adopted	3 - Material topics	4. Sustainable Development Goals   Our commitment 5. Responsible Environmental Management   Responsible principles for monitoring the environmental impact of our business activities 6. Health and Safety: a commitment to excellence 7. Protecting Human Rights and Zero Tolerance for Corruption 8. Commitment to the Local Area and Community   Responsible supply chain 9. People: Our primary asset   Driving equal opportunities	N/A

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)

General Matters		Reference framework	Section	Comments
Management Focus	Outcomes of the policies the company applies	3-3 Management of material topics	4. Sustainable Development Goals 5. Responsible Environmental Management   A dedicated team for protecting the environment 6. Health and Safety: a commitment to excellence 7. Protecting Human Rights and Zero Tolerance for Corruption 8. Commitment to the Local Area and Community   Responsible supply chain 9. People: Our primary asset   Driving equal opportunities	N/A
	The primary risks related with those issues associated with the group's activities	3-2 List of material topics	5. Responsible Environmental Management   A dedicated team for protecting the environment 7. Protecting Human Rights and Zero Tolerance for Corruption   Evolving Towards a More Robust Model 9. People: Our primary asset   Committed to work-life balance and professional development measures	N/A
Environmental issues		Reference framework	Section	Comments
Environmental management	Current and foreseeable effects of the company's activities on the environment and, as may apply, health and safety	N/A	5. Responsible Environmental Management	In the complete environment section there is a complete run-through of ITASA's current and foreseeable impact, in accordance with the goals set, measures implemented and monitoring indicators.
	Environmental evaluation and certification procedures	2-5 External verification	5. Responsible Environmental Management   A dedicated team for protecting the environment	N/A

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)

Environmental issues		Reference framework	Section	Comments
Environmental management	Resources dedicated to preventing environmental risks	N/A	5. Responsible Environmental Management   A dedicated team for protecting the environment	N/A
	Applying the principle of precaution	N/A	5. Responsible Environmental Management	N/A
	Number of provisions and guarantees for environmental risks	N/A	N/A	As indicated in the consolidated report, in note 5.15 “Environmental Assets”, by their nature, the Group’s business activities does not have a significant environmental impact and, consequently, there are no provisions regarding the environment or any contingencies.
Pollution	Measures to prevent, reduce or repair carbon emissions that seriously affect the environment, including any form of atmospheric pollution specific to an activity, including noise and light pollution	302-1 Energy consumption in the organization 302-2 Energy consumption outside the organization 305 -1 Direct GHG emissions (Scope 1)	5. Responsible Environmental Management   Consolidating our commitment to energy efficiency 5. Responsible Environmental Management   The fight against climate change	The carbon footprint is specific to the Andoa in plant. However, the energy consumption data for scopes 1 and 2, included in the “Consolidating Our Commitment to Energy Efficiency” section, are from both plants.
The circular economy and waste prevention and management	Measures for prevention, recycling, reuse and other ways of recovering and eliminating waste	306 - Waste	5. Responsible Environmental Management   Focus on creating solutions associated with waste management 5. Responsible Environmental Management   Waste Management: our figures	N/A
	Actions to combat food waste	N/A	N/A	This issue is not relevant to ITASA because of the business activity and sector in which the Group operates.

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)

	Environmental issues	Reference framework	Section	Comments
Sustainable use of resources	Water consumption and water supply in depending on local limitations	303 - Water and effluents	5. Responsible Environmental Management   Committed to responsible and circular water use	N/A
	Raw materials consumption Measures adopted to improve efficient use of them	301-1 Materials used by weight and volume 301-2 Recycled supplies used	5. Responsible Environmental Management   Committed to the sustainable consumption of raw materials	N/A
	Direct and indirect energy consumption	302-1 Energy consumption in the organization 302-2 Energy consumption outside the organization	5. Responsible Environmental Management   Consolidating our commitment to energy efficiency	N/A
	Measures taken to improve energy efficiency: renewable energy use	302 - Energy	5. Responsible Environmental Management   Consolidating our commitment to energy efficiency	N/A
Climate Change	Important elements of greenhouse gas emissions generated as a result of the company's business activities	N/A	5. Responsible Environmental Management   Consolidating our commitment to energy efficiency 5. Responsible Environmental Management   The fight against climate change	The carbon footprint is specific to the Andoaín plant. However, the energy consumption data for scopes 1 and 2, included in the "Consolidating Our Commitment to Energy Efficiency" section, are from both plants.
	Measures taken to adapt to the consequences of climate change	N/A	5. Responsible Environmental Management   Consolidating our commitment to energy efficiency 5. Responsible Environmental Management   The fight against climate change	The carbon footprint is specific to the Andoaín plant. However, the energy consumption data for scopes 1 and 2, included in the "Consolidating Our Commitment to Energy Efficiency" section, are from both plants.
	Voluntary reduction targets set for the medium and long term to reduce greenhouse gas emissions and the measures implemented to achieve them	N/A	5. Responsible Environmental Management   Consolidating our commitment to energy efficiency 5. Responsible Environmental Management   The fight against climate change	The carbon footprint is specific to the Andoaín plant. However, the energy consumption data for scopes 1 and 2, included in the "Consolidating Our Commitment to Energy Efficiency" section, are from both plants.

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)

Environmental issues		Reference framework	Section	Comments
Protecting biodiversity	Measures taken to preserve or restore biodiversity	N/A	5. Responsible Environmental Management   Responsible principles for monitoring the environmental impact of our business activities 5. Responsible Environmental Management   A dedicated team for protecting the environment	The primary measures associated with this requirement are geared towards ensuring sustainable forest management. Both the Andoa in and Querétaro plants have FSC and PEFC certificates for their custody chain management systems.
	Impacts caused by activities or operation in protected areas	N/A	5. Responsible Environmental Management   Responsible principles for monitoring the environmental impact of our business activities 5. Responsible Environmental Management   A dedicated team for protecting the environment	The primary measures associated with this requirement are geared towards ensuring sustainable forest management. Both the Andoa in and Querétaro plants have FSC and PEFC certificates for their custody chain management systems.
Social and employee issues		Reference framework	Section	Comments
Employment	Total number and distribution of employees by gender, age, country and professional classification	2-7 Employees	9. People: Our primary asset   Staff distribution at the close of the fiscal year	N/A
	Total number and distribution of kinds of employment contracts	N/A	9. People: Our primary asset   Staff distribution at the close of the fiscal year	N/A
	Yearly average by contract type (permanent, temporary or part-time), gender, age and professional classification	N/A	9. People: Our primary asset   Staff changes during the period	N/A

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)



Social and employee issues		Reference framework	Section	Comments
Employment	Number of terminations by gender, age and professional category	N/A	9. People: Our primary asset   Staff changes during the period	N/A
	Average compensation by gender, age and professional category	N/A	9. People: Our primary asset   Committed to competitive compensation	N/A
	Wage gap	N/A	9. People: Our primary asset   Committed to competitive compensation	N/A
	Compensation for equivalent positions or societal average	N/A	9. People: Our primary asset   How we organize and manage our social relationships in Andoain	N/A
	The average remuneration of the executive officers and managers, including variable compensation, per diem expenses, payment into long term supplemental savings plans and any other reason itemized by gender	N/A	9. People: Our primary asset   Committed to competitive compensation	As indicated in the attached consolidated report, the administrators of the dominant company have not received compensation for services rendered or remuneration for performing their responsibilities or as representatives in the administrative bodies of the companies in which the Company as a legal entity is an administrator. On 31 December 2022, there were no advances or credits to upper management staff members or members of the board of directors, nor were there obligations taken on by them as securities, nor were any premiums for civil liability insurance paid for the administrators for damages caused in performing their duties.
	Implementation of right to disconnect policies	N/A	9. People: Our primary asset   Committed to work-life balance and professional development measures	No specific measures were adopted in the 2022 fiscal year beyond the ones specifically mentioned in the applicable collective bargaining agreement.
Employees with disabilities	N/A	9. People: Our primary asset   Driving equal opportunities	N/A	

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)

Social and employee issues		Reference framework	Section	Comments
Work organization	Organization of work time	2-27 Legal and regulatory compliance 2-30 Collective bargaining agreements	9. People: Our primary asset   How we organize and manage our social relationships in Querétaro and Andoain	N/A
	Number of hours of absenteeism	N/A	N/A	The number of hours of absenteeism at the Andoain and Querétaro plants during fiscal year 2022 was 22,146 hours, including occupational and common illnesses.
	Measures aimed at facilitating a healthy work-life balance and encouraging co-parental practice of it by both parents	N/A	N/A	There are no measures in addition to the ones that are strictly obligatory under the collective bargaining agreement or contract.
Health and Safety	Health and safety conditions at work	403 - Occupational health and safety	6. Health and Safety: a commitment to excellence	N/A
	Work accidents and work-related illnesses (frequency and severity), itemized by gender	N/A	6. Health and Safety: commitment to excellence   Our main numbers	N/A
Social relations	Organization of the social dialog, including procedures for notifying and consulting staff and negotiating with them	N/A	9. People: Our primary asset   How we organize and manage our social relationships in Querétaro and Andoain	N/A
	Percentage of employees covered by collective bargaining agreements by country	2-27 Legal and regulatory compliance 2-30 Collective bargaining agreements	9. People: Our primary asset   How we organize and manage our social relationships in Querétaro and Andoain	N/A
	The balance of collective bargaining agreements, especially in the field of occupational health and safety	N/A	9. People: Our primary asset   How we organize and manage our social relationships in Querétaro and Andoain	N/A

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)

Social and employee issues		Reference framework	Section	Comments
Training	The policies implemented in the field of training	N/A	9. People: Our primary asset   Committed to work-life balance and professional development measures	The Group does not have a formally documented training policy. However, they hold training sessions during the year. Likewise, at the Andoain plant, a training plan is created annually that includes all the training needs expected for the following period.
	Total amount of training hours by professional category	N/A	9. People: Our primary asset   Committed to work-life balance and professional development measures	The Querétaro plant also held training sessions in the 2022 fiscal year. However, the number of hours is not representative and the management does not have a complete and systematic registry of them. Consequently, those hours have not been included on the table in this non-financial information statement.
Accessibility	Universal accessibility for people with disabilities	N/A	9. People: Our primary asset   Driving equal opportunities	N/A
Equality	Measures adopted to promote equal treatment and equal opportunities for men and women	N/A	7. Protecting Human Rights and Zero Tolerance for Corruption 9. People: Our primary asset   Driving equal opportunities	N/A
	Equality Plans	N/A	9. People: Our primary asset   Driving equal opportunities	N/A
	Measures adopted to promote employment		8. Commitment to the local area and community   Our relationship with society 9. People: Our primary asset   Driving equal opportunities	N/A
	Sexual and gender-based harassment protocol	N/A	9. People: Our primary asset   Driving equal opportunities	Itasa does not have a documented harassment protocol that is approved and circulated among all its employees.

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)

Social and employee issues		Reference framework	Section	Comments
Equality	Integration and universal accessibility for people with disabilities	N/A	7. Protecting Human Rights and Zero Tolerance for Corruption 9. People: Our primary asset   Driving equal opportunities	N/A
	The policy against all kinds of discrimination and, as applicable, diversity management	N/A	7. Protecting Human Rights and Zero Tolerance for Corruption 9. People: Our primary asset   Driving equal opportunities	Itasa does not have a policy against all kinds of specific discrimination. However, their commitment to zero-tolerance for discrimination is included in various corporate documents, like the Mativ and Itasa codes of conduct.

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)

Human Rights	Reference framework	Section	Comments
Application of due diligence procedures for human rights	2-22 Statement about the sustainable development strategy 2-23 Commitments and policies 2-24 Including commitments and policies 2-25 Processes for remedying negative impacts	7. Protecting Human Rights and Zero Tolerance for Corruption	N/A
Preventing risks of violating human rights and, as may apply, measures to mitigate, manage and repair possible abuses committed	2-22 Statement about the sustainable development strategy 2-23 Commitments and policies 2-24 Including commitments and policies 2-25 Processes for remedying negative impacts	7. Protecting Human Rights and Zero Tolerance for Corruption   Evolving towards a more robust model	N/A
Charges of human rights violations	2-22 Statement about the sustainable development strategy 2-23 Commitments and policies 2-24 Including commitments and policies 2-25 Processes for remedying negative impacts	7. Protecting Human Rights and Zero Tolerance for Corruption   Evolving towards a more robust model	N/A
Promotion and compliance with the provision of the fundamental agreements of the ILO related with respecting the rights of free association and collective bargaining, eliminating discrimination in employment and the workplace, eliminating forced or compulsory labor and the effective abolition of child labor	403-1 Occupational health and safety management system 403-2 Identifying hazards, evaluating risks and investigating accidents 403-4 Worker participation, consultation and communication regarding occupational health and safety 403-5 Training workers in occupational health and safety	6. Health and Safety: A commitment to excellence   Preserving health and job satisfaction 7. Protecting Human Rights and Zero Tolerance for Corruption	N/A

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)

Corruption and money laundering		Reference framework	Section	Comments
Corruption and money laundering	Measures adopted to prevent corruption, bribery and money laundering	205-2 Communication and training on anti-corruption policies and procedures	7. Protecting Human Rights and Zero Tolerance for Corruption	N/A
	Contributions to foundations and non-profit entities	N/A	8. Commitment to the local area and community   Our relationship with society	N/A
Information about the company		Reference framework	Section	Comments
The company's commitment to sustainable development	Impact of the company's business activities on employment and local development, populations and territory	N/A	8. Commitment to the local area and community   Our relationship with society	N/A
	Relationships with local community actors and the modalities of the dialog with them	N/A	8. Commitment to the local area and community	N/A
	Membership or sponsorship activities	2-28 Association membership	8. Commitment to the local area and community   Our relationship with society	N/A
Subcontracting and suppliers	Social, gender equality and environmental issues included in the purchasing policy and social and environmental responsibility considered in relationships with suppliers and subcontractors	414-1 New suppliers who have passed selection filters in accordance with social criteria 414-2 Negative social impacts on the supply chain and measures taken	8. Commitment to the Local Area and Community   Responsible supply chain	N/A

# Reference Table of Requirements under Spanish law 11/2018 INF and Contents of the Global Reporting Initiative (GRI Indicators)



Information about the company		Reference framework	Section	Comments
Subcontracting and suppliers	Supervision and audit systems and their results	414-1 New suppliers who have passed selection filters in accordance with social criteria 414-2 Negative social impacts on the supply chain and measures taken	8. Commitment to the Local Area and Community   Responsible supply chain	N/A
Consumers	Health and safety measures for consumers	N/A	N/A	Because ITASA does not sell to end consumers, rather they are an intermediary in the value chain, this requirement is not considered to be relevant for the Group.
	Claims, complaints received and resolution systems	N/A	N/A	Because ITASA does not sell to end consumers, rather they are an intermediary in the value chain, this requirement is not considered to be relevant for the Group.
Tax information	Profits obtained country by country	207-4.b.vi Presentation of reports by country	8. Commitment to the local area and community   Fiscal transparency and communication with public authorities	N/A
	Tax on profits paid	207-4.b.viii Presentation of reports by country	8. Commitment to the local area and community   Fiscal transparency and communication with public authorities	N/A
	Public subsidies received	201-4.a.3 Financial assistance received from government	8. Commitment to the local area and community   Fiscal transparency and communication with public authorities	N/A



# 2022 Non-Financial Information Statement