



The
SUSTAINABILITY
Code

Declaration of conformity 2021

Reclay Systems GmbH

Indicator set

GRI SRS

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Indicator set

The declaration was drawn up in accordance with the following reporting standards:

GRI SRS

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Date: 2021, source: company data.
The reporting company is responsible
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General

General Information

Describe your business model (including type of company, products / services)

We implement legal requirements for the entire packaging industry in Germany and other countries. As a system operator, we fulfill our participation obligations both responsibly and fully. For our customers, it is our job to be their contact in all matters relating to the implementation of EPR requirements or self-imposed environmental targets. This allows us to organize the cycle in a client-specific way in all areas.

In search of the best solutions, we also accompany our customers abroad. We provide our international know-how and our networks for consulting services there.

Additional remarks:

We fulfill our tasks with passion and always work together with our customers, our partners and with each other in the sense of creating the most sustainable solutions.

CRITERIA 1–10: SUSTAINABILITY POLICY

Criteria 1–4 concerning STRATEGY

1. Strategic Analysis and Action

The company declares whether or not it pursues a sustainability strategy. It explains what concrete measures it is undertaking to operate in compliance with key recognised sector-specific, national and international standards.

The Reclay Group is an internationally oriented service provider in the field of extended producer responsibility (EPR) and voluntary solutions for closing material cycles and all of the tasks related to this. Our aim is to create added value through our daily actions: for the environment, for our customers, for our employees and thus for our group of companies. The concept of sustainability is firmly established in our entire corporate philosophy. This philosophy is reflected not least in the sustainability report that we publish regularly.

Our sustainability strategy is (primarily) based on the Sustainable Development Goals (SDGs) and the UN Global Compact.

The SDGs and the UN Global Compact are evident in the following areas:

- Corporate Responsibility
- Dealing with the issue of compliance
- Sustainable development strategy, economic stability, vertical and horizontal growth, sustainable quality of our services and the impact on our customers

2. Materiality

The company discloses the aspects of its business operations that have a significant impact on sustainability issues and what material impact sustainability issues have on its operations. It analyses the positive and negative effects and provides information as to how these insights are integrated into the company's processes.

Long-term and profitable growth requires sustainable and future-oriented

economic activity. We can only achieve this goal by acting in a socio-economic manner, taking our responsibility towards employees, customers, business partners, the society and the environment seriously and by acting in a transparent and credible way both internally and externally (inside-out perspective: 1. boosting the economy; 2. creating and securing jobs; 3. developing innovation). Our Corporate Principles reflect this self-image. They set our corporate goals and define the way we treat each other, our customers and partners. We commit ourselves with these Corporate Principles to establish the idea of sustainability as the basis of all our services.

Outside-in perspective: We try to meet the individual needs of our clients with our entire range of services. This is how we pursue the goal of meeting our customers' wishes and strengthening customers' loyalty. A high level of innovation is essential for the continuous development of individual solutions that are consistent with current trends and developments. In order to enable a functioning and implementable circular economy, we need digital and disruptive approaches. We see enormous potential here and fundamentally pursue the goal of using our resources meaningfully and efficiently to operate with long-term success in the markets that are relevant to us.

Ecological sustainability is also a cornerstone of our corporate philosophy. We are one of currently eleven dual systems in Germany and organise the collection, sorting and recycling of used sales packaging for industry and trade in this framework. One of our company's aspiration is to contribute to the reduction of CO₂ emissions.

Sustainable development means the following for us - in doing so, we are guided by the SDG's of the United Nations.

Successful Business:

We are and remain thought leaders.

We competently occupy the relevant topics and leave a lasting mark on them.

We grow in a qualified manner, but not at all costs.

Despite all growth and economic success, we keep our flexibility, competence, creativity and pulse intensity.

We only promise what we can deliver. We understand commitments as obligations. The customer forms the focal point of all our activities.

We think in a cost-conscious and performance-oriented way.

We choose our business partners carefully. Performance and consideration determine the mutual relationship.

SDG's: 3. health and well-being; 8. decent work and economic growth; 9. industry, innovation and infrastructure; responsible consumption and production patterns; climate action; 17. partnerships to achieve goals.

Protect the environment:

Ecology and economy is not a contradiction for us. The environmentally-conscious treatment of the environment is an essential pillar of the company.

We implement our environmentally relevant concepts across national borders.
We rely on continuous training of our employees on the subject of environmental management.

We use modern and resource-saving technology and equipment.

We support our employees to act, either outside or within the enterprise, in an environmentally-conscious manner.

SDG's: 11. sustainable cities and communities; 13. climate action; 14. life under water; 15. life on land.

Respect people:

We are predictable.

We are loyal and expect loyalty in return.

We maintain professional, open, fair and friendly relations.

We create jobs that provide opportunities for individual success and security.

Our managers are role models. Through clear management structures and transparent communication, we integrate our employees into the company's process. In doing so, we always pay attention to flat hierarchies and harmonious to friendly team-building.

We recognise our competitors and embrace healthy competition.

SDGs: 3. health and well-being; 5. gender equality; 8. decent work and economic growth; 10. fewer inequalities.

Our future sustainability:

We are committed to continuous professional development in all areas.

Through training, coaching and individual development.

We rely on the diversity of the talents, the commitment and the comprehensive knowledge of our employees to achieve the best results.

We will nationally and internationally expand our position as an innovation leader and further increase our profitability.

We are continuously expanding our portfolio of services and optimising internal business processes.

The sustainable management of our group of companies and our orientation towards the SDGs result in both ecological and social opportunities for our company. We ensure a future with development potential either for us as a company and for our environment. Only in a functioning circular economy, in which we manage to conserve resources and sustainably keep recyclable materials in the cycle, can we operate successfully in the long term. Through the aforementioned training and coaching, we gain well-trained and environmentally-aware specialists who we can integrate into our company as new colleagues.

Through our sustainable and environment-focused activities, we are also regarded as a responsible and dutiful organization by our partners, customers and public stakeholders. This promotes awareness of our brand and ensures further growth of talented and motivated individuals in the labour market.

3. Objectives

The company discloses what qualitative and/or quantitative as well as temporally defined sustainability goals have been set and operationalised and how their level of achievement is monitored.

Sustainability goals of the Reclay Group

As an international service provider in the field of environmental and waste disposal management, we are known for innovative and individual solutions in the sense of a functioning circular economy. We are convinced that the circular economy concept must form the basis of all our decisions. In doing so, we always pursue our ambition to protect the scarce resources of our planet by equally supporting the economic goals of our customers and partners. Not least through the contents of the coalition agreement of the recently elected government it becomes clear: the topic of circular economy is more relevant than ever and is also gaining importance in the public and political debate on an almost daily basis. We have already been active in the collection, sorting and recycling of packaging waste in various countries for over 20 years and are consistently developing new and digital approaches to expand our capabilities in these areas. The sensible and sustainable use of our resources and the reduction of CO₂ emissions will continue to be the defining task in the coming years and decades, which we need to tackle in global cooperation. For this reason, we have also set ourselves goals this year to promote a sustainable future within our potential.

Global response to a common challenge

We have already established successful take-back systems in many countries on different continents, to ensure organised processes in the recycling of packaging waste. In order to seriously tackle the challenges of climate change and CO₂ pollution in a promising way, we believe that global cooperation is necessary. Our goal is therefore, on the one hand, to tap into other countries so that regulated systems can be implemented there as well. On the other hand, we are also increasingly relying on the expertise and professional competence of other industry participants to create meaningful synergies and thus increase the collective efficiency in the fight for the same goal. We believe that we all need to work together to achieve the greatest impact.

Development versus stagnation

Last but not least, the further development of existing solutions and approaches will be crucial to our success. Innovation and digitalisation must be drivers of our effort to be able to make the progress we need to achieve our goals. Whether it is incentive-based app solutions to increase recycling rates, the use of QR codes and digital watermarks in deposit return systems or highly sensitive infrared technology in sorting plants - technological developments

and disruptive approaches are already and will increasingly be the key on the way to a functioning and implementable circular economy in the future.

Setting an example with one's own philosophy

To be able to stand up for our goals consistently and forcefully to the outside world, we have to work from within with a shared conviction and passion. Our team and each individual member is our most important asset. That is why we rely on regular internal training measures and motivating and sustainable benefits such as company bikes or sponsored running shoes to show each appreciation. Only if we ourselves internalise our sustainable philosophy of a feasible circular economy, can we implement it in our processes with the necessary motivation. Our goal is to constantly develop and be inspired within the framework of these three pillars. This idea motivates us every day.

All our goals in relation to sustainable business are fundamentally based on the UN's 17 SDGs. We have already gone into this in more detail in point 2 "Materiality". The achievement of our goals is driven and controlled by the management level of our company.

4. Depth of the Value Chain

The company states what significance aspects of sustainability have for added value and how deep in the value chain the sustainability criteria are verified.

As part of the Reclay Group, Reclay Systems GmbH is a globally active service provider in environmental and waste disposal management. Reclay Systems GmbH is currently one of eleven dual systems in Germany.

The dual systems are responsible to ensure, that the recycling rates prescribed by the legislator in the Packaging Act, are achieved. For this purpose, they organise the collection, sorting and recycling of used sales packaging for industry and trade throughout Germany. In order to ensure sustainable use of our increasingly scarce resources, we must close material cycles as best as we can. An important basis for this is created by the end consumers - because with the correct waste separation they make a significant contribution to a functioning recycling and thus a contribution in the fight against the pollution of our environment.

For this, it is significant that all completely emptied packages are disposed of in the yellow bag or the yellow bin. Packaging that must be disposed of in this way is called lightweight packaging (LVP). It consists of plastic, aluminium, ferrous metals and composite materials such as beverage cartons. After collection, they are sorted in a sorting plant and then sent to get recycled. Glass and paper packaging are also recycled. In order to succeed the recycling

in the best possible way, it is also absolutely necessary to separate the individual components. For example, the yoghurt lid belongs separately from the cup in the yellow bag/yellow bin. If the packaging is made of paper, it should be disposed of in the paper bin. Glass packaging is disposed of in the colour-separated glass containers. Properly separated household waste has a direct impact on the recycling rate. We all bear responsibility!

Information in accordance with § 14 VerpackG Reclay Systems GmbH and the operators of other dual systems inform consumers, among other things, online with the nationwide initiative "Mülltrennung wirkt" ("waste separation works") (www.muelltrennung-wirkt.de) about the purpose of the separate collection of packaging waste and the collection systems and recycling results established for this purpose.

The Reclay Group's value chain is based on three pillars:

1. RecycleMe Consulting: sustainability not as a term, but as a daily common practice. With the help of our experts and our know-how in the recycling industry, we advise companies in the circular economy on all aspects of recyclability and Extended Producer Responsibility (EPR). We play our part with providing expertise in closing the cycle.

2. Take-back systems: Whether it is sales packaging, transport packaging, packaging of hazardous goods, batteries and rechargeable batteries or electrical appliances - Reclay supports the implementation of obligations and ensures the efficient take-back and licensing of packaging. We are also happy to assist our customers in an international context, as each (EU) country has its own laws and its own obligations. We help to maintain an overview of the complex legal situation here - so that our customers can fully concentrate on their core business.

3. Recycling: All activities related to material flow management and trading in secondary raw materials: from solutions for transforming different materials into high-quality secondary raw materials, to the buying and selling of selected recycled and processed materials in the area of plastic, metal, paper, glass and lightweight packaging, to working on forward-looking approaches to modern waste management. With its range of services in the area of recyclable waste trade, Reclay closes the reusable material cycle and secures important secondary raw materials for the producing industry.

Sustainability criteria are reviewed along the entire value-added chain (consulting, return and utilisation, recyclable waste trade): Only resources that can be regenerated (or are renewable) are used.

Reclay Systems GmbH has defined three dimensions of sustainability for itself:

1. social sustainability (human resources): skills, experience, education, motivation, physical and mental health.

2. ecological sustainability (natural resources): raw materials, living

creatures (such as marine animals), trees.

3. economic sustainability (intangible resources): software, patents, licences, trust.

Criteria 5–10 concerning PROCESS MANAGEMENT

5. Responsibility

Accountability within the company's management with regard to sustainability is disclosed.

Responsibility for the issue of sustainability in the company lies in the first place with the Management. From there it is passed on to the individual teams and ultimately practiced by each and every employee. Our slogan "Sustainability needs pioneers" reflects the philosophy on which the entire company and the direction of our actions are based.

We want to reduce our own environmental impact and offer services to our customers that bear the mark "environmentally-friendly". For this we have been operating an environmental management system that was certified in accordance with ISO 14001 since 2011.

This integrated system gives us a detailed view of our environmental impact, allows us to identify opportunities for improvement and, based on this, takes specific measures to avoid and reduce negative effects. Our environmental management puts us in a position to actively take precautions and thus prevent possible environmental damage from occurring in the first place.

6. Rules and Processes

The company discloses how the sustainability strategy is implemented in the operational business by way of rules and processes.

Today and in the future we want to make all our activities environmentally friendly with our long-term sustainability. However, we can only achieve a sustainable reduction of our environmental impact if we take action together with our employees. For this reason, we have launched various projects to raise our employees' environmental awareness and make a daily contribution to sustainable environmental protection.

The sustainability strategy is anchored into our everyday business as follows:

Employee training: in order to sensitize our employees' towards energy-efficient behaviour in the workplace, we conduct training courses focusing on

CO₂, environmental and energy efficiency as part of the environmental management system, in which all employees participate.

Promotion of public transport: We want to contribute to the fact that trips by public transport are considered as attractive by our employees and are thus preferred to the use of a car. Against this background we introduced the "Jobticket" - a season ticket for public transport - which we heavily subsidise. In this way, traveling to work is significantly cheaper than using the car. The response to the job ticket has been extremely positive.

One year without lift: With our campaign "One year without a lift" (Cologne site), which we ran for the first time in 2013, we demonstrate that saving energy can be great fun. Each employee who voluntarily renounces using the lift for a year receives a pair of professional running shoes based on a treadmill analysis and professional advice. The average number of employees taking part in this sporting event is 75 percent.

Vehicle fleet: With the goal of reducing our biggest source of emissions - fuel consumption - we already pay attention to efficient engine classes when purchasing our company cars. In addition, there was already growth for the Reclay Group vehicle fleet in 2012: at several locations, women's and men's bicycles in the Reclay design are available to employees for rides during their lunch break or for nearby appointments.

Energy efficiency: During the planning of our building concept, the topic of energy efficiency was at the top of the agenda. We have therefore used energy-saving illuminants throughout the building, which are controlled by motion detectors. There is no uniform ceiling lighting for entire floors, but rather workstation individual lighting. In this way the light burns only when it is needed.

Waste separation and avoidance: We know: Recycling is only possible if waste is properly separated (#recyclingmatters). Therefore we ensure strict waste separation on our sites. To avoid the use of beverage packaging such as PET and glass bottles, we have introduced drinking water dispensers at the Reclay House in Cologne that supply both still and sparkling mineral water.

7. Control

The company states how and what performance indicators related to sustainability are used in its regular internal planning and control processes. It discloses how suitable processes ensure reliability, comparability and consistency of the data used for internal management and external communication.

We try to keep the following KPI indicators as low as possible:

- Rail and air travel
- Refuelling of company cars and rental cars
- Heat consumption
- Procurement of electricity

Each individual employee contributes to this through his or her own responsibility.

Regular employee checks ensure compliance with KPIs and quality, for example through our quality and environmental management.

Key Performance Indicators to criteria 5 to 7

Key Performance Indicator GRI SRS-102-16: Values

The reporting organization shall report the following information:

a. A description of the organization's values, principles, standards, and norms of behavior.

In addition to economic success, partnership, creativity and entrepreneurial spirit, the most important basic values that characterise the Reclay group are social responsibility and ethical behaviour.

The Reclay group attaches great importance to flat hierarchies. Delegation and entrepreneurial freedom make it possible to react flexibly and efficiently to market conditions and customer needs. Personal integrity and a sense of responsibility are therefore indispensable characteristics of our employees.

The goal of our actions is to find the best solution for our clients under respectively existing framework conditions - whether in the fulfilment of external requirements or in the pursuit of our own objectives. The client determines the scope of our services. We are prepared to develop and implement comprehensive approaches with them, but we are also available for defined individual services. The idea of sustainability is the basis of our actions.

During our professional activities, we often have to decide whether a certain behaviour is appropriate or not. Some questions can help to make the right decision:

- Is my decision in accordance with applicable law and the company's internal rules?
- Do I make the decision independently, free from any personal interest and solely in the best interest of the company?
- Can my decision stand up to scrutiny in compliance?

- Does my decision uphold the company's reputation for being law-abiding and socially-responsible?

We support a working environment that is characterised by respect and tolerance in our business group, and in which the value and dignity of each individual are recognised. It goes without saying that employees should treat each other politely, honestly and with respect. Discriminatory behaviour towards employees, customers or contractors is not tolerated in our company. Especially when it comes to personnel-related decisions such as hiring, promotions or disciplinary measures, we attach great importance to non-discriminatory decision-making. Any verbal or physical behaviour that violates the dignity of a person is inadmissible.

8. Incentive Systems

The company discloses how target agreements and remuneration schemes for executives and employees are also geared towards the achievement of sustainability goals and how they are aligned with long-term value creation. It discloses the extent to which the achievement of these goals forms part of the evaluation of the top managerial level (board/managing directors) conducted by the monitoring body (supervisory board/advisory board).

"Sustainability needs pioneers" is our motto - all employees, regardless of whether they are trainees or authorised signatories, are socialised to behave sustainably.

There is no remuneration system for the implementation of sustainability goals in our company and there are no plans to do so, because the idea of sustainability is anchored in the minds of our employees. The implementation of the sustainability goals is ensured in our company through regular controls.

Key Performance Indicators to criteria 8

Key Performance Indicator GRI SRS-102-35: Remuneration policies

The reporting organization shall report the following information:

a. Remuneration policies for the highest governance body and senior executives for the following types of remuneration:

- i.** Fixed pay and variable pay, including performance-based pay, equity-based pay, bonuses, and deferred or vested shares;
- ii.** Sign-on bonuses or recruitment incentive payments;
- iii.** Termination payments;
- iv.** Clawbacks;
- v.** Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees.

b. How performance criteria in the remuneration policies relate to the highest governance body's and senior executives' objectives for economic, environmental, and social topics.

a) The salary of the executive Board and managers is published in the annual business report. The rate structures and payments above the general pay scale are presented there either.

The granting of bonuses (holiday pay, Christmas bonus, service anniversary bonus, etc.) by the employer is voluntary with respect to the employees.

The employer grants the employee capital-forming benefits in accordance with the 5th Capital Formation Act in the amount of 40€ per month, provided that the employee has a corresponding contract.

Variable remuneration and bonus payments are agreed individually.

b) A remuneration policy in connection with the economic, ecological and social goals is currently no longer being pursued.

Key Performance Indicator GRI SRS-102-38: Annual total compensation ratio

The reporting organization shall report the following information:

a. Ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.

The employees of the Reclay Group receive fair salary in line with the market and performance.

The relation of the total annual salary of the highest paid person at Reclay Systems GmbH compared to the median total annual compensation for all employees in the respective country is not determined.

9. Stakeholder Engagement

The company discloses how the socially and economically relevant stakeholders are identified and integrated into the sustainability process. It states whether and how an ongoing dialogue takes place with them and how the results are integrated into the sustainability process.

The needs and wishes of our customers are the focus of our actions. Our customers are the obligated parties from product responsibility and come from industry and trade. This stakeholder group results not least from legislation, as our customers are obliged to participate in a system according to the Packaging Act. We think from the perspective of the customer first. That is why we address both micro and large customers with our offer. Every service and every product must be questioned according to its customer benefit and sustainability. Consequently, the dialogue with each client/stakeholder group takes place individually - this is precisely our strength: creating individual solutions for individual clients.

Stakeholders are naturally our customers as well as our employees, but of course we also address trading partners and the entire public at large. We are also in dialogue with politicians. Through regular exchange with the aforementioned stakeholders, we remain up to date and are thus able to respond to changes at short notice. Closing material cycles sensibly and internationally is a global challenge that affects every economic operator. That is why we have defined our stakeholdership accordingly broadly.

We consider all critical factors, opportunities and risks that are important for the sustainable success of the Reclay Group to be key fields of action in the context of sustainability. We therefore limit ourselves here to aspects and fields of action that are affected by relevant internal and external impacts of our business activities and are of great relevance to our stakeholders. These can be aspects of an economic, ecological or social nature.

Key Performance Indicators to criteria 9

Key Performance Indicator GRI SRS-102-44: Key topics and concerns

The reporting organization shall report the following information:

- a.** Key topics and concerns that have been raised through stakeholder engagement, including:
- i.** how the organization has responded to those key topics and concerns, including through its reporting;
 - ii.** the stakeholder groups that raised each of the key topics and concerns.

The Reclay Group has identified the following topics that are particularly important to them:

- **Integrity & Compliance:** promotion of conduct consistent with the values and principles of the Reclay Essentials and the Code of Conduct and building trusting relationships with all employees, customers, business partners and government authorities who rely on the Reclay Group as a law-abiding partner.
 - mainly presented by customers and business partners
- **Antitrust compliance:** promotion of fair competition and prevention of anti-competitive behaviour
 - mainly presented by competitors and shareholders.
- **Data protection & data security:** guarantee secure, lawful handling of confidential, individual-related (customer) data.
 - mainly presented by business partners and employees
- **Diversity:** recruitment and sustainable employment of a diverse workforce and guarantee of equal opportunities for everyone; creation of an inclusive corporate culture and appreciation of different perspectives as a basis for creativity and innovation.
- **Fair working conditions:** guarantee of decent working conditions for employees, including job security, respecting employees' privacy, fair pay and promoting appropriate participation in the company's success.
- **Paper:** sourcing paper from recycled materials and sustainably managed forests.
- **Intellectual Property & Copyright:** includes issues such as copyright, patents, royalties, illegal downloads, counterfeiting and piracy.
- **Learning:** promotion of further education and training to meet major

- business challenges with well-trained staff; strengthening of staff innovation.
- mainly presented by employees
 - **Employee involvement:** involvement of employees through performance reviews and employee suggestion system.
 - mainly presented by the shareholders.
 - **Health:** creation of a safe, secure and healthy working environment for all employees.
 - mainly presented by the shareholders.
 - **Anti-corruption and bribery:** commit to and guarantee processes to prevent corruption in all its forms.
 - mainly presented by the shareholders.

10. Innovation and Product Management

The company discloses how innovations in products and services are enhanced through suitable processes which improve sustainability with respect to the company's utilisation of resources and with regard to users. Likewise, a further statement is made with regard to if and how the current and future impact of the key products and services in the value chain and in the product life cycle are assessed.

Our services are primarily aimed at advising packaging manufacturers and distributors on how to make their packaging recyclable in accordance with the Packaging Act. Our customers deserve sustainable and future-oriented solutions.

Social and ecological aspects of sustainability are as the following:
The more recyclable a packaging is, the more sustainable it is as well: This is because new packaging can be produced again with the recyclates that are produced from it. This reduces the waste generation. Society is more and more socialised to buy recyclable packages and thus contribute to the circular economy.

Our business is not possible without innovation.

Typical innovation processes are the suggestions and ideas of all employees. New innovations are created in the team through conversations and discussions. Other innovations arise from customer requests, lack of options in everyday life and demands from consumers.

Example: Using paper

Paper has been saved in our company for a long time, all systems are digitalised (as far as possible). We also send all invoices to our customers digitally, provided they have given their consent. The entire processing of our services and all marketing (advertising, PR, social media) is either done digitally.

Innovations with which we contribute to close the recycling cycle along the value-added chain include our app solutions, which we use to motivate end consumers to adapt the correct recycling behavior.

Key Performance Indicators to criteria 10

Key Performance Indicator G4-FS11

(report also in accordance with GRI SRS): Percentage of assets subject to positive and negative environmental or social screening.
(Note: the indicator should also be reported when reporting to GRI SRS)

Reclay Systems GmbH has no financial asset, therefore 0%.

Criteria 11–20: Sustainability Aspects

Criteria 11–13 concerning ENVIRONMENTAL MATTERS

11. Usage of Natural Resources

The company discloses the extent to which natural resources are used for the company's business activities. Possible options here are materials, the input and output of water, soil, waste, energy, land and biodiversity as well as emissions for the life cycles of products and services.

As the Reclay Group we operate in the service sector.

Natural resources are used in work routine, such as water, electricity, thermal energy or vehicle fleet energy. Regular training courses sensitise the employees to the efficient use of resources. Due to a lack of measured and reference values concrete consumption data cannot continue to be indicated.

12. Resource Management

The company discloses what qualitative and quantitative goals it has set itself with regard to its resource efficiency, in particular its use of renewables, the increase in raw material productivity and the reduction in the usage of ecosystem services, which measures and strategies it is pursuing to this end, how these are or will be achieved, and where it sees there to be risks.

Increasingly scarce resources and rising raw material prices make the efficient use of finite resources more and more important. That is why we have already introduced environmental management in accordance with DIN EN ISO 14001. The modern circular economy represents environmental protection and resource efficiency.

We close cycles and help to fulfil legally-prescribed recycling rates with our core business. We advise packaging manufacturers and distributors on how to produce sustainably and recyclably in order to ensure the most effective possible return to the material cycle from the outset. At the same time, we are aware of our responsibility towards consumers.

To make our commitment visible, we have started to convert our vehicle fleet

to electric mobility. By 2025, we would like to have converted our entire vehicle fleet to electric. We have already provided our employees with several electric vehicles.

A new building, which will stand as a metaphor for sustainability, is planned as well. The following is planned for example: starting by choosing the location, to the use of sustainably-produced, renewable and recyclable (building) materials, to the use of solar energy, to the use of a filter system of rainwater. We are still in the conception phase of the building, which is why no concrete development can be described.

Risks cannot be identified at this time. Conflicts of objectives may arise, however.

Key Performance Indicators to criteria 11 to 12

Key Performance Indicator GRI SRS-301-1: Materials used

The reporting organization shall report the following information:

- a.** Total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by:
- i.** non-renewable materials used;
 - ii.** renewable materials used.

Printing paper and postal envelopes are 100% recycled paper (renewable materials). The total weight has not yet been determined, but is planned beginning in 2022. The goal is to become a paperless company from 2025. In the purchase and use of all materials, attention is paid to fulfill the following environmental labels: FSC, Blue Angel or EU Ecolabel.

We use printer cartridges as a non-renewable material. What we only use here are colourless cartridges.

Key Performance Indicator GRI SRS-302-1: Energy consumption
The reporting organization shall report the following information:

a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.

b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.

c. In joules, watt-hours or multiples, the total:

i. electricity consumption

ii. heating consumption

iii. cooling consumption

iv. steam consumption

d. In joules, watt-hours or multiples, the total:

i. electricity sold

ii. heating sold

iii. cooling sold

iv. steam sold

e. Total energy consumption within the organization, in joules or multiples.

f. Standards, methodologies, assumptions, and/or calculation tools used.

g. Source of the conversion factors used.

a)

Type of goods	Year	Quantity in L
Diesel	2020	23080.36
High-performance diesel	2020	345.65
Super, unleaded	2020	219.56

b) Reclay Systems GmbH does not consume any fuel from renewable energies.

c) Both the electricity and energy consumption cannot be determined separately due to the existence of only one connection for each of several tenants and their inclusion in the flat-rate rent.

d) There is no trading in energy.

e) The energy consumption cannot be determined separately due to the existence of only one connection for several tenants and its inclusion in the

flat-rate rent.

f) Non-existent.

g) Non-existent.

Key Performance Indicator GRI SRS-302-4: Reduction of energy consumption

The reporting organization shall report the following information:

a. Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.

b. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.

c. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.

d. Standards, methodologies, assumptions, and/or calculation tools used.

a-d) Due to the lack of reference and measurement values, no information can be provided on this.

Key Performance Indicator GRI SRS-303-3: Water withdrawal
The reporting organization shall report the following information:

- a.** Total water withdrawal from all areas in megaliters, and a breakdown of this total by the following sources, if applicable:
- i.** Surface water;
 - ii.** Groundwater;
 - iii.** Seawater;
 - iv.** Produced water;
 - v.** Third-party water.
- b.** Total water withdrawal from all areas with water stress in megaliters, and a breakdown of this total by the following sources, if applicable:
- i.** Surface water;
 - ii.** Groundwater;
 - iii.** Seawater;
 - iv.** Produced water;
 - v.** Third-party water, and a breakdown of this total by the withdrawal sources listed in i-iv.
- c.** A breakdown of total water withdrawal from each of the sources listed in Disclosures 303-3-a and 303-3-b in megaliters by the following categories:
- i.** Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids);
 - ii.** Other water ($> 1,000$ mg/L Total Dissolved Solids).
- d.** Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

a) The water withdrawal cannot be determined separately due to inclusion in the flat-rate rent.

b) The water withdrawal cannot be determined separately due to inclusion in the flat-rate rent.

c) Non-existent.

d) Non-existent.

Key Performance Indicator GRI SRS-306-3: Waste generated
The reporting organization shall report the following information:

a. Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.

b. Contextual information necessary to understand the data and how the data has been compiled.

a) No dangerous waste is produced at Reclay Systems GmbH.

b) Of course, we ensure strict waste separation in order to recycle as many valuable materials as possible.

We either use glass bottles with a deposit or water from drinking water dispensers.

For all packaging that accumulates in the company, we ensure on the one hand that it is easy to recycle and on the other hand that the packaging consists of recycled materials.

In addition, we try to use as little paper as possible, but if it is unavoidable, we use recycled paper.

With about 100 employees, we produce about 18kg of waste per employee per year. Of this, approximately 80% is recyclable and 20% is disposed of as residual waste.

c) i. Directly disposed of by the organisation or otherwise confirmed directly.

13. Climate-Relevant Emissions

The company discloses the GHG emissions in accordance with the Greenhouse Gas (GHG) Protocol or standards based on it and states the goals it has set itself to reduce emissions, as well as its results thus far.

We critically take a look at all environmental impacts - especially our own. We already implemented an environmental management system according to DIN EN ISO 14001 in 2011. At the same time, we have established a quality management system according to DIN EN ISO 9001, which we use to continuously improve our processes and structures. We are doing everything we can to meet the growing demands put on us and our customers.

The goal is to raise our total emissions in relation to our number of employees (reference figure) by 2025. We are currently in the process of designing possible collection methods. The largest emissions are probably still released by the vehicle fleet, which, as already mentioned, is also to be completely

converted to electric mobility by 2025.
Primarily renewable energies are to be used in our new building.

Key Performance Indicators to criteria 13

Key Performance Indicator GRI SRS-305-1: Direct (Scope 1) GHG emissions

The reporting organization shall report the following information:

- a.** Gross direct (Scope 1) GHG emissions in metric tons of CO₂ equivalent.
- b.** Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃ or all.
- c.** Biogenic CO₂ emissions in metric tons of CO₂ equivalent.
- d.** Base year for the calculation, if applicable, including:
 - i.** the rationale for choosing it;
 - ii.** emissions in the base year;
 - iii.** the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e.** Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f.** Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g.** Standards, methodologies, assumptions, and/or calculation tools used.

a-g) There are no GHG emissions, which occur at Reclay Systems GmbH. We do not carry out any combustion in our own or third-party facilities.

Key Performance Indicator GRI SRS-305-2: Energy indirect
(Scope 2) GHG emissions

The reporting organization shall report the following information:

- a.** Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- b.** If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- c.** If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- d.** Base year for the calculation, if applicable, including:
 - i.** the rationale for choosing it;
 - ii.** emissions in the base year;
 - iii.** the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e.** Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f.** Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g.** Standards, methodologies, assumptions, and/or calculation tools used.

a-g) Due to the existence of only one point of use without a sub meter in the rented property, no GHG emissions can be individually allocated to Reclay Systems GmbH.

Key Performance Indicator GRI SRS-305-3: Other indirect (Scope 3) GHG emissions

The reporting organization shall report the following information:

a. Gross other indirect (Scope 3) GHG emissions in metric tons of CO₂ equivalent.

b. If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.

c. Biogenic CO₂ emissions in metric tons of CO₂ equivalent.

d. Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.

e. Base year for the calculation, if applicable, including:

i. the rationale for choosing it;

ii. emissions in the base year;

iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.

f. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.

g. Standards, methodologies, assumptions, and/or calculation tools used.

a-g) The GHG emissions in the rented property are recorded by a single point of use and cannot be individually allocated due to the lack of a sub-meter at Reclay Systems GmbH.

Key Performance Indicator GRI SRS-305-5: Reduction of GHG emissions

The reporting organization shall report the following information:

- a.** GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO₂ equivalent.
- b.** Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- c.** Base year or baseline, including the rationale for choosing it.
- d.** Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).
- e.** Standards, methodologies, assumptions, and/or calculation tools used.

a-e) Unfortunately it is not possible to report on the extent of the reduction due to the fact that it is not possible to individually record and allocate the GHG emissions to Reclay Systems GmbH. As this will not change in the future, it is not expected to be reported on in the next Sustainability Report.

Criteria 14–20 concerning SOCIETY

Criteria 14–16 concerning EMPLOYEE-RELATED MATTERS

14. Employment Rights

The company reports on how it complies with nationally and internationally recognised standards relating to employee rights as well as on how it fosters staff involvement in the company and in sustainability management, what goals it has set itself in this regard, what results it has achieved thus far and where it sees risks.

Reclay Systems GmbH is operating on a national level. Our employees are among the leading experts in their fields and are pioneers. We are not salespeople but consultants who focus on the needs of our customers and work with them to develop customised solutions for the highest possible level of sustainability. We develop solutions for a functioning and global circular economy. The very purpose of our work places us in an environment that promotes sustainability. All colleagues are committed to the sustainable use of natural resources through their work in companies and are supported in their work by additional benefits such as vouchers, further training opportunities and mobility allowances. Our employees either ensure system operation and guarantee corporate processes in a variety of functions. Everyone has a high degree of personal integrity and strictly complies with all legal, ethical, moral and sustainable framework conditions. Detailed guidelines are contained in our Code of Conduct, which is binding for the management and all employees. We guarantee our employees fair salary, fair holiday entitlement and the opportunity to flexibly organise their own working hours. All employees have the option of actively shaping internal procedures and processes as well. Respect for health protection, occupational safety and all national standards is naturally also a matter for us. We are not aware of any risks. With regular training courses for employees with personnel responsibility, we ensure that all employees are managed in accordance with current standards and are also given room for individual development in a safe and employee-friendly environment in the future. This constant development of each employee is our objective.

15. Equal Opportunities

The company discloses in what way it has implemented national and international processes and what goals it has for the promotion of equal opportunities and diversity, occupational health and safety, participation rights, the integration of migrants and people with disabilities, fair pay as well as a work-life balance and how it will achieve these.

Equal opportunities for everyone, regardless of gender, origin or religion, is and remains our highest principle and is at the same time our key to success, because the cultural and ethnic diversity of our workforce provides the most diverse impulses. Broad language skills are just one of the enriching facet available to us in our international activities within the business group. Different perspectives on the issues we have to deal with and a wide variety of problem-solving approaches are characteristics that make us so successful as a team. New positions are therefore filled exclusively on the basis of the applicants' professional and personal suitability and their development potential, and this will not change in the future (concrete goal achieved). In order to provide our employees with a work-life balance, we offer them various, individually tailored flexible working time models that make it possible for them to optimally balance their private and professional lives. Regarding equal opportunities, salary, occupational safety, etc., see item 14.

16. Qualifications

The company discloses what goals it has set and what measures it has taken to promote the employability of all employees, i.e. the ability of all employees to participate in the working and professional world, and in view of adapting to demographic change, and where risks are seen.

Please see point 15.

As a complement to this: After parental leave, we enable mothers and fathers, for example, to easily get reintegrated through working first of all on a part-time basis and having the possibility to remote work, and thus to be able to return back to work earlier.

In 2013, 60% of all employees were female and 35% of management positions were held by women. We had set ourselves the goal of having 50% of management positions held by women by 2022. This goal has not yet been fully achieved (40% in 2020). However, we would like 50% of management

positions to be held by women by 2025.

We would like to fulfil every employee's desire for further training/parallel studies (this goal is already implemented since 2018). The same applies to digital training and health check-ups: An example is that we offer free influenza vaccinations and eye examinations for all our employees once a year. Risks arise neither from the business relationships nor from the services. Working for our company also has no negative impact on the qualifications of our employees.

Key Performance Indicators to criteria 14 to 16

Key Performance Indicator GRI SRS-403-9: Work-related injuries
The reporting organization shall report the following information:

a. For all employees:

- i.** The number and rate of fatalities as a result of work-related injury;
- ii.** The number and rate of high-consequence work-related injuries (excluding fatalities);
- iii.** The number and rate of recordable work-related injuries;
- iv.** The main types of work-related injury;
- v.** The number of hours worked.

b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:

- i.** The number and rate of fatalities as a result of work-related injury;
- ii.** The number and rate of high-consequence work-related injuries (excluding fatalities);
- iii.** The number and rate of recordable work-related injuries;
- iv.** The main types of work-related injury;
- v.** The number of hours worked.

You will find the remaining numbers c-g of the indicator SRS 403-9 in the GRI standard and may additionally report them here.

Key Performance Indicator GRI SRS-403-10: Work-related ill health

The reporting organization shall report the following information:

a. For all employees:

- i.** The number of fatalities as a result of work-related ill health;
- ii.** The number of cases of recordable work-related ill health;
- iii.** The main types of work-related ill health.

b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:

- i.** The number of fatalities as a result of work-related ill health;
- ii.** The number of cases of recordable work-related ill health;
- iii.** The main types of work-related ill health.

You will find the remaining numbers c-e of the indicator SRS 403-10 in the GRI standard and may additionally report them here.

Neither work-related injuries nor illnesses are known.

Key Performance Indicator GRI SRS-403-4: Worker participation on occupational health and safety

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

a. A description of the processes for worker participation and consultation in the development, implementation, and evaluation of the occupational health and safety management system, and for providing access to and communicating relevant information on occupational health and safety to workers.

b. Where formal joint management–worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these committees.

a) Employee involvement in occupational health and safety is documented in the Reclay Group's occupational health and safety management.

We are committed to provide safe working conditions ensuring that our employees have a healthy working environment, such as ergonomic work equipment, workplaces and work processes.

We regularly motivate our employees to live a safe and healthy lifestyle, for example by providing a fitness room. We plan to offer yoga classes and have already implemented regular jogging together before and after work.

We also have a comprehensive health management programme for our employees, for example regular eye examinations and influenza vaccinations. This will help to prevent our employees getting sick at work and reduce the number of absences due to illness. We appeal to our employees to eliminate causes of illness immediately.

b) Formal employer-employee committees for occupational health and safety do not exist.

Key Performance Indicator GRI SRS-404-1: Average hours of training

The reporting organization shall report the following information:

a. Average hours of training that the organization's employees have undertaken during the reporting period, by:

i. gender;

ii. employee category.

Reclay Systems GmbH supports and promotes the further qualification of all their employees. Further training and its scope varies from employee to employee.

The median number of training and further education days for employees is 4 days per year.

Key Performance Indicator GRI SRS-405-1: Diversity

The reporting organization shall report the following information:

a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories:

i. Gender;

ii. Age group: under 30 years old, 30-50 years old, over 50 years old;

iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).

b. Percentage of employees per employee category in each of the following diversity categories:

i. Gender;

ii. Age group: under 30 years old, 30-50 years old, over 50 years old;

iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).

a) Controlling employee:

At Reclay Systems GmbH, we employ approximately 40% women and 60% men.

The proportion of people under 30 years of age is approximately 0%.

The proportion of 30-50 year olds is around 70%.

The proportion of those over 50 is around 30%.

b) Employee:

At Reclay Systems GmbH we employ approximately 60% women and 40% men.

The proportion of those under 30 is around 20%.

The proportion of 30-50 year olds is around 70%.

The proportion of those over 50 is around 10%.

Key Performance Indicator GRI SRS-406-1: Incidents of discrimination

The reporting organization shall report the following information:

- a.** Total number of incidents of discrimination during the reporting period.
- b.** Status of the incidents and actions taken with reference to the following:
 - i.** Incident reviewed by the organization;
 - ii.** Remediation plans being implemented;
 - iii.** Remediation plans that have been implemented, with results reviewed through routine internal management review processes;
 - iv.** Incident no longer subject to action.

a-b) There has been no discrimination incident in the entire Reclay Group until today.

Criterion 17 concerning RESPECT FOR HUMAN RIGHTS

17. Human Rights

The company discloses what measures it takes, strategies it pursues and targets it sets for itself and for the supply chain for ensuring that human rights are respected globally and that forced and child labour as well as all forms of exploitation are prevented. Information should also be provided on the results of the measures and on any relevant risks.

Respect for the personal honour, privacy and personal rights of our colleagues, customers, suppliers and others with whom we are in contact is naturally a matter for us. We are against all forms of forced labour and child labour. Laws and rules for the protection of human rights, for fair working conditions, legal minimum wages and other labour law provisions are obligatory for us. We do not tolerate the exploitation or discrimination of people on the basis of their age, gender, health or origin. Since all applicable laws are complied with, there are no risks.

The objectives are already implemented with the Code of Conduct and the AGG guidelines (General Equal Treatment Act).

The strategy consists of informing employees and consistently applying the AGG guideline.

The previous objectives were fully achieved, in particular through the AGG Directive. No violation of human rights has been identified until now.

Key Performance Indicators to criteria 17

Key Performance Indicator GRI SRS-412-3: Investment agreements subject to human rights screenings

The reporting organization shall report the following information:

a. Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.

b. The definition used for ‘significant investment agreements’.

a) Respect for the personal dignity, privacy and personal rights of our colleagues, customers, suppliers and others with whom we are in contact is a matter of course for us. We are against all forms of forced labour and child labour. Laws and rules for the protection of human rights, for fair working conditions, statutory national minimum wages and other labour law provisions are obligatory for us. We do not tolerate exploitation or discrimination of people on the basis of their age, gender, religion, health or origin.

b) Throughout the Reclay Group, there are no investment agreements or contracts that contain human rights clauses or have been screened for human rights aspects, as all business activities are subject to the strict legal requirements of the respective country.

Key Performance Indicator GRI SRS-412-1: Operations subject to human rights reviews

The reporting organization shall report the following information:

a. Total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country.

All our operations are subject to the legal requirements of the respective country, therefore there is no indicator to check for the preservation of human rights.

Key Performance Indicator GRI SRS-414-1: New suppliers subject to social screening

The reporting organization shall report the following information:

a. Percentage of new suppliers that were screened using social criteria.

All our business relationships are subject to the legal requirements of the respective country, therefore there is no indicator for the verification of social criteria.

Key Performance Indicator GRI SRS-414-2: Social impacts in the supply chain

The reporting organization shall report the following information:

a. Number of suppliers assessed for social impacts.

b. Number of suppliers identified as having significant actual and potential negative social impacts.

c. Significant actual and potential negative social impacts identified in the supply chain.

d. Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment.

e. Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why.

a-e) Social impacts in the supply chain are not verified as we are a service company and have no supply chains.

Criterion 18 concerning SOCIAL MATTERS

18. Corporate Citizenship

The company discloses how it contributes to corporate citizenship in the regions in which it conducts its core business activities.

The fact that we care not only about environmental education but also about

local nature protection is manifested, among other things, in our support for the NABU Nature Arena in Wesel, an information and demonstration project for children, young people and adults that offers nature to touch, smell, taste and gaze at. The message behind it is that it can only be preserved with a sustainable lifestyle.

Together with day-care centres and kindergartens in the Lahn-Dill district, we have launched the campaign "Trendy hilft Kindern. Mach mit!". As part of the initiative, children and parents collect worn-out clothes and receive a contribution to the equipment of their facility through a bonus point system. In the process, the children learn a lot about environmental protection, waste separation and recycling through exciting trendy play and learning materials. The central theme is the "trendy", a cheerfully laughing, stylised yellow bag that invites the children to join in.

Key Performance Indicators to criteria 18

Key Performance Indicator GRI SRS-201-1: Direct economic value generated and distributed

The reporting organization shall report the following information:

a. Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:

- i.** Direct economic value generated: revenues;
- ii.** Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments;
- iii.** Economic value retained: 'direct economic value generated' less 'economic value distributed'.

b. Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance.

a) Turnover by revenue source in EUR million

	2020	2019
Dual systems:	269.0	121.8
Consulting:	1.4	1.9
Trading:	1.2	0.4

b) Group turnover by region in EUR million

	2020	2019
Germany:	244.0	105.3
Austria:	25.6	17.1
EU (ex DACH):	1.0	0.6
Canada:	2.5	2.8

Criteria 19–20 concerning ANTI-CORRUPTION AND BRIBERY MATTERS

19. Political Influence

All significant input relating to legislative procedures, all entries in lobby lists, all significant payments of membership fees, all contributions to governments as well as all donations to political parties and politicians should be disclosed by country in a differentiated way.

Reclay Systems GmbH is a neutral service company that operates without donations and/or payments.

The packaging law is the relevant law for our services. For example, it prescribes the recycling rates for packaging made of different materials.

In order to create added value for society, we have founded our own charity: trendy e.V. The charity collects donations independently of our company.

As the Reclay Group we are not politically involved and are therefore not a member of any political party. We do not donate to political parties/associations.

Key Performance Indicators to criteria 19

Key Performance Indicator GRI SRS-415-1: Political contributions
The reporting organization shall report the following information:

a. Total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary.

b. If applicable, how the monetary value of in-kind contributions was estimated.

- a) Reclay Systems GmbH is an independent and owner-managed company.
- b) There are no-cash benefits or anything similar.

20. Conduct that Complies with the Law and Policy

The company discloses which measures, standards, systems and processes are in place to prevent unlawful conduct and, in particular, corruption, how they are verified, which results have been achieved to date and where it sees there to be risks. The company depicts how corruption and other contraventions in the company are prevented and exposed and what sanctions are imposed.

Corruption, bribery or bribes are not permitted. Bribery or corruptibility in business transactions occurs when an employee of a company is offered, promised or granted advantages by a third party in order to favour him or her in an anti-competitive manner. Conversely, the offence is fulfilled if the employee asks for these advantages. The formulation and treatment of such offences varies again from country to country and employees who are confronted with such situations should consult the legal department. Corruption is sanctioned according to the applicable jurisdiction. Please refer to our Compliance Policy for everything else.

We have established a compliance management system for which the contact person is Katharina Rall-Adomeit. Managers and employees are made aware of compliance issues through their employment contract and through/with our intranet. Please refer to the Code of Conduct and the attached document for the compliance guidelines.

A (remaining) risk with regard to corruption always exists, but in our case the risk is almost excluded, as we are a service provider and therefore advise to our clients with regard to the applicable jurisdiction.

Key Performance Indicators to criteria 20

Key Performance Indicator GRI SRS-205-1: Operations assessed for risks related to corruption

The reporting organization shall report the following information:

a. Total number and percentage of operations assessed for risks related to corruption.

b. Significant risks related to corruption identified through the risk assessment.

a) No operating sites have had to be checked for corruption risks so far. All employees are obliged to adhere to the existing compliance guidelines.

b) Significant corruption risks cannot be identified so far.

Key Performance Indicator GRI SRS-205-3: Incidents of corruption

Die berichtende Organisation muss über folgende Informationen berichten:

a. Total number and nature of confirmed incidents of corruption.

b. Total number of confirmed incidents in which employees were dismissed or disciplined for corruption.

c. Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.

d. Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.

a) There have been no incidents of corruption until today.

b) see a, no dismissals or warnings

c) see a, no dismissals or warnings

d) see a, no dismissals or warnings

Key Performance Indicator GRI SRS-419-1: Non-compliance with laws and regulations

The reporting organization shall report the following information:

- a.** Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of:
 - i.** total monetary value of significant fines;
 - ii.** total number of non-monetary sanctions;
 - iii.** cases brought through dispute resolution mechanisms.

- b.** If the organization has not identified any non-compliance with laws and/or regulations, a brief statement of this fact is sufficient.

- c.** The context against which significant fines and non-monetary sanctions were incurred.

a-c) There are no cases of non-compliance with laws and regulations existing.

Overview of the GRI indicators in the Sustainable Code declaration

In this Sustainable Code declaration, we have reported according to the "comply or explain" principle on the GRI indicators listed below. This document refers to the GRI Standards 2016, unless otherwise noted in the table.

Areas	Sustainable Code criteria	GRI SRS indicators
STRATEGY	1. Strategic Analysis and Action	
	2. Materiality	
	3. Objectives	
	4. Depth of the Value Chain	
PROCESS MANAGEMENT	5. Responsibility	GRI SRS 102-16
	6. Rules and Processes	
	7. Control	
	8. Incentive Systems	GRI SRS 102-35 GRI SRS 102-38
	9. Stakeholder Engagement	GRI SRS 102-44
	10. Innovation and Product Management	G4-FS11
ENVIRONMENT	11. Usage of Natural Resources	GRI SRS 301-1
	12. Resource-Management	GRI SRS 302-1 GRI SRS 302-4 GRI SRS 303-3 (2018) GRI SRS 306-2 (2020)*
	13. Climate-Relevant Emissions	GRI SRS 305-1 GRI SRS 305-2 GRI SRS 305-3 GRI SRS 305-5
SOCIETY	14. Employment Rights	GRI SRS 403-4 (2018)
	15. Equal-Opportunities	GRI SRS 403-9 (2018)
	16. Qualifications	GRI SRS 403-10 (2018) GRI SRS 404-1 GRI SRS 405-1 GRI SRS 406-1
	17. Human Rights	GRI SRS 412-3 GRI SRS 412-1 GRI SRS 414-1 GRI SRS 414-2
	18. Corporate-Citizenship	GRI SRS 201-1
	19. Political Influence	GRI SRS 415-1
	20. Conduct that Complies with the Law and Policy	GRI SRS 205-1 GRI SRS 205-3 GRI SRS 419-1

*GRI has adapted GRI SRS 306 (Waste). The revised version comes into force on 01.01.2022. In the course of this, the numbering for reporting on waste generated has changed from 306-2 to 306-3.