



**ANNUAL  
REPORT**



**Grupo  
iberpapel**



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 Grupo  
**iberpapel**



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## 01. CHAIRMAN'S LETTER

GRI: 102-14

Dear shareholders,

I began this letter last year by highlighting the great complexity of 2020, shaped by the economic and social impact of the pandemic.

At that time, we were facing 2021 with hopeful prospects. The lifting of restrictions and the start of vaccination campaigns pointed to a solid recovery, leaving behind the worst of the health crisis and returning to normality in all areas.

Unfortunately, new challenges and major difficulties arose in the last quarter of the year.

New waves of coronavirus infections caused by different variants of the pathogen showed us that the disease was not yet fully under control and that restrictions on people's mobility had to be resumed.

The world economy was hit by global supply chain issues that hindered a return to pre-pandemic volumes and delivery rates. There were many reasons for this: the difficulty of resuming production after long periods of closure, raw material shortages and bottlenecks in major logistics centres and communication routes.

But above all, the decisive factor was the unpredictable rise in gas prices, dragging with it all other energies.

In the last quarter, the huge volatility of gas meant that the cost multiplied five or sixfold, which had a very significant effect on the Group's results.

Fortunately, our Company has an excellent cogeneration system that helped us (and is helping us) to alleviate this difficult situation to a large extent.

The Group also actively launched plans to pass on these costs in the price of our products, which is gradually being achieved month by month.

Despite the tough conditions, the Iberpapel Group managed to end the year with significantly better results than the previous year.

Sales increased driven primarily by the rise in paper units sold, which caused 46% growth in revenue in this business up to €181.90 million. Electricity revenue also increased by 90% to €51.44 million. At the year-end, EBITDA totalled €21 million, 10% up on 2020, while net profit grew by 119% to €9.29 million.

Similarly, Iberpapel's management over the last two years has been exemplary, applying measures to safeguard the business, protect employees' health and jobs, build confidence in the supply chain and deliver value to shareholders.

Another important aspect this year is the consolidation of our investment to modernise and increase the capacity of our pulp mill, which we are confident will allow us to meet new commercial objectives in the coming months.

Our commitment to the Sustainable Development Goals is reflected in our achievements during the year, which are described in this report. But I would like to highlight some of them, such as the 165,802 tonnes of CO<sub>2</sub> we have avoided by supplying power produced by our gas and biomass cogeneration plants, the 657,000 tonnes of CO<sub>2</sub> sequestered by our plantations during the voluntary CO<sub>2</sub> capture project, or the 94% rate of permanent contracts, which endorses our commitment to job stability and security.

I would like to end by thanking all those who contribute to making this Company ready to face present and future challenges, the entire Iberpapel team whose talent and attitude make us a benchmark for quality and a competitive player in the market. And, of course, thanks also to the shareholders who continue to place their trust in us.

**ÍNIGO ECHAVARRÍA CANALES**  
*IBERPAPEL'S CHAIRMAN*

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# IBERPAPPEL AT A GLANCE



## 2.1 OUR PERFORMANCE IN 2021

### FINANCIAL AND NON-FINANCIAL HIGHLIGHTS AND KEY INDICATORS

Iberpapel is an integrated paper group with a history of over 80 years, committed to quality, service and the environment. Since the beginning, it has been one of Spain's leading players in the printing and writing paper market.

#### How we helped our stakeholders and the Group develop in 2021:

##### OUR PEOPLE

<b>293</b> -1.35% vs. 2020	<b>94.20%</b> +2.10% vs. 2020	<b>9</b> -10% vs. 2020
Number of employees <sup>1</sup>	% indefinite contracts	No. of disabled employees

##### OUR CUSTOMERS

<b>92%</b> = vs. 2020	<b>93%</b> = vs. 2020	<b>30%</b> +50% vs. 2020
% long-term domestic customers <sup>2</sup>	% long-term international customers <sup>3</sup>	Specialty paper sales

##### OUR SUPPLIERS

<b>90%</b> -10% vs. 2020
Custody chain certified timber suppliers

##### OUR COMMUNITIES

<b>91,84%</b> -3.34% vs. 2020	<b>2</b> -50% vs. 2020	<b>12</b> = vs. 2020
Domestic suppliers	Community sponsorships	Involvement in forums and associations

##### OUR ENVIRONMENTAL RESPONSIBILITY

<b>165,802 t CO<sub>2</sub></b> +2.38% vs. 2020	<b>0.583 MWh/t</b> -5.97% vs. 2020	<b>71%</b> +7.58% vs. 2020
CO <sub>2</sub> emissions avoided	Power consumption	Waste reused

##### OUR CORPORATE GOVERNANCE

<b>94%</b> -3% vs. 2020	<b>10</b> -9% vs. 2020	<b>84.99%</b> +3.23% vs. 2020
% Code of Good Governance recommendations followed	Number of Board meetings	% attendance at the Annual General Meeting

##### OUR FINANCIAL HIGHLIGHTS

<b>21.07 million €</b> +10.13% vs. 2020	<b>9.29 million €</b> +119.10% vs. 2020	<b>(19.70)%</b> +56.06% vs. 2020
EBITDA	Net profit	Leverage ratio

##### OUR SHAREHOLDERS

<b>0.50 €/share</b> <sup>4</sup> +66.67% vs. 2020	<b>58.41%</b> -18.51% vs. 2020	<b>2,89</b> +12.89% vs. 2020
Dividends in FY 2021	Pay-out	Return on Equity (ROE) <sup>5</sup>

<sup>1</sup>At the year-end (31/12/2021) <sup>2</sup>For over 5 years <sup>3</sup>Calculated as the product of dividing current assets by current liabilities, representing the proportion of short-term debts covered by assets that will be cashed at approximately the same time as the debts will fall due / <sup>4</sup>€0.25 per share proposed to the General Meeting / <sup>5</sup>ROE: EBIT divided by shareholders' funds.

## IBERPAPPEL'S HIGHLIGHTS

GRI:102-7

<b>Economic performance (million euro)</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>
Revenue	237.23	152.88	213.47
Gross operating profit (EBITDA)	21.06	19.13	36.99
Operating margin (% of revenue)	8.88	12.51	17.33
Operating profit (EBIT)	7.80	6.67	26.3
Attributable net profit	9.29	4.24	21.68
Margin (% of sales)	3.92	2.77	10.16
<b>Balance sheet (million euro)</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>
Total assets	385.84	397.92	378.76
Equity	269.65	260.89	266.83
Net borrowings	(53.12)	(32.95)	(78.77)
Investments	8.58	58.17	22.73
<b>Financial and management ratios</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>
Net debt/Equity (%)	(19.70)	(12.63)	(29.52)
Net debt/EBITDA	(2.59)	(1.72)	(2.13)
Return on Equity (%) <sup>(1)</sup>	7.81	7.33	13.86
EBITDA return on equity (%) <sup>(2)</sup>	3.44	1.63	8.12
Working capital (million euro) <sup>(3)</sup>	92.58	132.59	151.48
General liquidity (x) <sup>(4)</sup>	2.21	3.63	3.59
<b>Shareholder return (euro per share)</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>
Interim dividend	0.25	0.20	0.4
Supplementary, definitive dividend*	0.25*	0.10	0.15
Dividend yield (%)	2.78	1.74	2.16
Pay-out (%)	58.41	76.92	26.73
<b>Our stock</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>
Number of shares	11,039,829	11,039,829	11,039,829
Capitalisation (million euro)	198.72	189.89	281.52
Year-end share price (euro)	18.00	17.2	25.5
Average share price during the year (euro)	18.40	19.86	26.79
Per-share equity (euro)	24.43	23.63	24.17
Price/Per-share equity (x)	0.74	1.37	1.05
PER (price-to-earnings ratio) (x)	20.93	44.1	12.39
Earnings per share (euro)	0.86	0.39	2.06
<b>Social responsibility</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>
Employees (no.)	293	297	294
Employees with indefinite contracts (%)	94.20	92.26	92.8
Custody chain certified suppliers	90	100	100
<b>Environment</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>
CO <sub>2</sub> emission savings (t)	165,802	161,951	240,666
Power consumption (MWh/t)	0.583	0.62	0.552
Waste reused (%)	71	66	42
<b>Corporate governance</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>
Code of Good Governance recommendations followed (%)	94	97	98
Board of Directors meetings (no.)	10	11	10
Attendance at the Annual General Meeting (%)	84.99	82.13	83.96

\*\* Proposed to the General Meeting

<sup>(1)</sup> Calculated as the result of dividing EBITDA by shareholders' funds.<sup>(2)</sup> Calculated as the quotient formed by net profit and equity, representing the relationship between economic profit and the equity capital necessary to obtain it.<sup>(3)</sup> Calculated as the excess of current assets over current liabilities, representing the company's capacity to continue to do business as normal in the short term.<sup>(4)</sup> Calculated as the product of dividing current assets by current liabilities, representing the proportion of short-term debts covered by assets that will be cashed at approximately the same time as the debts will fall due.

## 2.2 MILESTONES IN 2021 AND FUTURE CHALLENGES

### 26 FEBRUARY 2021

The Iberpapel Group announces the profit of €4.24 million obtained in 2020.

The Iberpapel Group announces the appointment by co-optation of Fermín Urtasun Erro as Executive Director.

Luis González Gutiérrez is appointed Non-Voting Vice-Secretary.

### 15 MAY 2021

The Annual General Meeting is convened.

### 30 JUNE 2021

The resolutions adopted by the Annual General Meeting on 29 June are attached.

### 1 JULY 2021

The Annual General Meeting resolves to pay a supplementary, definitive gross dividend of €0.10 per share out of 2021 profits.

### 22 JULY 2021

The Company reports the acquisition of 28,449 treasury shares at a unit price of €18, representing 0.258% of share capital.

### 29 JULY 2021

The Board of Directors resolves to pay a gross interim dividend of €0.25 per share out of 2021 profits.

The Company's Board of Directors resolves to re-appoint the independent director Jesús Alberdi Areizaga as a member of the Corporate Social Responsibility Committee.

### 22 DECEMBER 2021

Changes to Committee positions.

## FUTURE CHALLENGES BY CHAPTER



### OUR GROUP

- Optimise the performance of the pulp mill.
- Continue to focus on expanding the specialty market by developing new products to reach a 30% market share.
- Bolster the Company's leading position in the printing and writing paper segment.
- Maximise the yield from forestry assets, following high sustainability standards.
- Assure tight cost control, as in recent years.
- Sell short-fibre cellulose (bleached eucalyptus kraft pulp).



### OUR SOCIAL RESPONSIBILITY

- Promote the hiring of young professionals to have the best talent.
- Retain talent.
- Adapt attendance control at the plant.
- Maintain a stable working climate and improve industrial relations.
- Reaffirm the Equality Plan 2020-2025.
- Consolidate the existing Health and Safety Management System under the ISO 45001 standard.
- Negotiate the provincial collective bargaining agreement.



### **OUR ENVIRONMENTAL RESPONSIBILITY**

- Assess our carbon footprint as a means to coordinate a decarbonisation policy in the Company.
- Establish a Company decarbonisation policy.
- Promote energy efficiency as a means of reducing the effects of global warming.
- Encourage the reuse of waste internally or in other companies so as to promote the circular economy.
- Reduce our environmental impact by improving environmental parameters.



### **OUR CORPORATE GOVERNANCE**

- Adapt the Bylaws, the General Meeting Regulations and the Board of Directors Regulations to Law 5/2021 of 12 April amending the Spanish Companies Act, among other legislation.
- Increase the involvement of the least represented gender.
- Prepare a responsible procurement policy.



### **FY 2022**

- Consolidate diversification into specialty papers at around 30%.
- Sell short-fibre cellulose (bleached eucalyptus kraft pulp) to third parties.
- Keep up our efforts to bolster the Group's financial position.

**3**

# **OUR GROUP**



## 3.1 THE IBERPAPEL GROUP AND VALUE CREATION

We take a number of key capitals ... .. to bring value to our key stakeholders ... .. and we have positive impacts on society and the environment.

**FINANCIAL**  
Available shareholders' funds, debt and grants.

**Shareholders, investors and the financial community.**  
A consistent and transparent financial structure, investing in sustainable growth and future prospects.

Reducing our impact on the local area, preserving the natural environment and biodiversity.

**INDUSTRIAL**  
Machinery, plants and equipment.

**Customers**  
Satisfying customers through a flexible commercial strategy with huge capacity to adapt so as to boost profitability and product and service quality.

Advancing economic, social and environmental objectives hand in hand, focusing on clean energy, optimising energy efficiency and producing responsibly and sustainably.

**INTELLECTUAL**  
Technology, systems, licences and industry knowledge.

**Suppliers**  
A relationship of trust based on honesty, respect and responsible management.

Committing continuous team training while fostering engagement and excellence.

**HUMAN**  
Experience, capacity and team motivation.

**Employees**  
Believing in equal opportunities for all employees, encouraging participation and training, and ensuring diversity and a work-life balance.

Promoting personal development and a good working environment through collaboration, support and respect.

**NATURAL**  
Forests and environmental processes such as waste reuse.

**Using natural and renewable raw materials** from sustainably managed forests, promoting clean fuels, reducing our carbon footprint and responsibly managing water and waste.

Integrating innovation and respect for the environment throughout the value chain.

**SOCIAL**  
Cooperation, transparency and trusting relationships with stakeholders.

**Regulators and associations**  
Complying with current regulations, collaborating with institutions and committing to society.

Having a positive impact on our local area and building value in the communities.

## 3.2 MARKET CONTEXT

### CURRENT AND FUTURE OUTLOOK FOR THE GLOBAL AND DOMESTIC ECONOMY

Iberpapel keeps abreast of new developments in the market in which we operate. This reflects our belief in the importance of knowing the current global and national economic context and in analysing future prospects so as to anticipate potential risks and opportunities.

The economic recovery continues in the aftermath of the Covid-19 pandemic, although momentum has weakened due to the re-emergence of new variants and the increase in cases. The recovery is also being hampered by the uncertainty that continues to plague the market.

The International Monetary Fund (IMF) projects world economic growth of 5.9% in 2021, reflecting a significant economic recovery on 2020, when growth was negative by 3.3%. According to its latest report, global GDP is in line with projections made in the first half of the year. But there was a slight decline of 0.1% in the second half caused by rising inflation as a general trend in all developed economies and in Latin America. This led to higher energy and commodity prices, which in turn triggered disruptions in the market supply chain forming industry bottlenecks.

Some exporting countries projected an improvement in the availability of commodities towards the end of the year which, together with the increase in commodity prices, partially offset the change in GDP so that the difference was not so pronounced. However, the IMF expects that the rise in prices of some industrial metals such as cobalt, nickel and lithium could last until the end of the next decade, seriously affecting the world economy.

The development of new technologies for the energy transition to a greener energy landscape requires these materials, as opposed to fossil fuel-based technologies. For example, lithium batteries are an essential component of electric vehicles. The same applies to renewable energy, hydrogen and carbon capture technologies. The International Energy Agency (IEA) explains that in order to reach the goal of zero net emissions by 2050, there will be considerable demand for these industrial metals in the coming years to meet the needs of the global energy transition. So the IEA anticipates that a delay and failure to meet environmental targets could ensue.

World economic growth is accompanied by the increasing immunisation of the population. Access to vaccines and supportive policies are the main drivers of the divisions that mark the economic recovery. While 60% of the population in the advanced economies is already immunised, 96% of the population in the emerging market economies remains unvaccinated.



In the IMF's latest World Economic Outlook report, the projection for the global economy in 2022 is unchanged from previous reports at a stable 4.9%.



Another factor that has significantly affected the market has been the rapid rise in the price of natural gas. Besides the resulting high energy prices, this can lead to economic instability due to the possibility of supply shortages and outages, a situation that is not expected to improve until the Spring of 2022.

The global economic situation will be affected by a shift towards sustainability, driven by increasingly restrictive environmental policies on greenhouse gas emissions. The latest UN Climate Change Conference (COP26) laid the groundwork for a paradigm shift with an international agreement on the global environmental transition. One of the most emphasised aspects was the need for investment to address the consequences of climate change and a transition to cleaner energies. An agreement was also reached by the participating countries to reduce greenhouse gas emissions and phase out coal as a fuel.



**UN CLIMATE  
CHANGE  
CONFERENCE  
UK 2021**  
IN PARTNERSHIP WITH ITALY

Spain was one of the European countries hardest hit by the crisis, with GDP plummeting by 11% last year, the largest decline in developed countries according to the IMF. Happily, the outlook for 2021 is much more optimistic, estimating 4.5% growth and recovery.



On the road to economic recovery, the Strategic Project for Economic Recovery and Transformation (PERTE) was presented in July 2021 as part of the Recovery, Transformation and Resilience Plan. The aim is not to go back to the pre-Covid-19 starting point but to move towards a greener and more resilient economy by going green and digital.

**WORLD  
BANK'S GROWTH  
ESTIMATES  
(GDP)**

- 2021: **5.5%**
- 2022: **4.1%**
- 2023: **3.2%**

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## RISKS

- Resurgence of the Covid-19 pandemic as new variants emerge
  - Economic slowdown triggered by China's property market slump
  - Rising inflation in developed economies
  - More restrictive GHG emissions policies
  - Strong but uneven economic recovery
  - Industry bottleneck: protracted supply chain disruptions
  - Sharp rise in energy prices
- 

## OPPORTUNITIES

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- Going for a green economic recovery
  - Market trend towards digitalisation and automation
  - Adapting to new environmental regulations
  - Building market resilience
- 

Disruptions in the hospitality sector, the largest in Spain, and in retail trade have considerably delayed the labour market recovery. The jobless rate rose to 15.5% in 2020. Although this increase was expected to continue in 2021, it fell slightly to 15.0%, offering a more optimistic outlook. Although the unemployment rate is expected to remain high, projections for the following years reflect a steady and gradual decline down to 14.3% in 2022 and 13.3% in 2023. This is also influenced by the trend towards automation, a change that has been accelerated by all these circumstances.

## PAPER INDUSTRY OUTLOOK

Despite doubts about whether paper will become less important in the digital age, it remains an absolutely necessary commodity in our lives. Paper is used in many aspects of our daily lives, from education to commerce and transport, among others. This is why the paper and board industry is highly relevant to the global economy.

In 2020, 388 million tonnes of paper were produced worldwide. China remained the world's largest producer of paper and board with a total of 70.3 million tonnes. But the industry's leading companies are in the US, followed by Japan and Finland.

Europe is home to some of the world's largest paper producing countries, accounting for around one quarter of global paper production. In 2020, the member countries of the Confederation of European Paper Industries (CEPI) produced around 90 million metric tonnes of paper and board. In Europe, according to the latest available data for 2020, the paper industry reported more than €83 billion, involving hundreds of thousands of employees across the continent.

Although the digital age has displaced some uses of paper, demand for other products, such as packaging paper, has been growing in recent years.

The paper industry has been affected by the Covid-19 pandemic, like most sectors. Paper production fell in Europe, but demand for packaging paper and board soared. Sales of other sanitary and hygiene products made from timber, such as paper tissues, also increased. According to the latest statistics report from European Graphic Paper Statistics (Euro-Graph), total demand in Europe grew by 2.9% (2021 figure) in 2021 compared to 2020.

### 2020 HIGHLIGHTS

LATEST DATA AVAILABLE

Paper and board production (million t)

#### GLOBAL

• **388** (-5% vs. 19)

#### EUROPE

• **85.1** (-5% vs 19)

#### SPAIN

• **6.3** (-2.6% vs. 19)

## RISKS

- Changing market trend
- Rising energy prices may affect the industry's competitiveness in Europe
- Trade barriers: protectionist tariffs and subsidies for rivals
- High cost of cellulose

## OPPORTUNITIES

- New opportunities for innovation
- Displacement of plastic as a packaging material: sustainable packaging
- Pioneering industry in Europe's low-carbon economy

### Paper industry in Spain

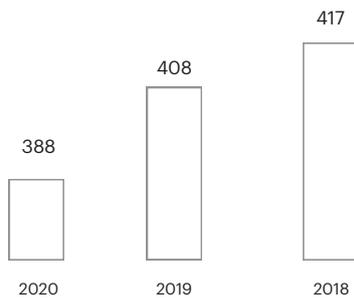
The paper industry is constantly evolving and integrating innovation into all processes and products out of respect for the environment. The Iberpapel Group is fully aligned with these values and keeps abreast of new trends so as to adapt our approach while always keeping sustainability in mind, throughout the value chain.

The paper industry is one of Spain's most consolidated sectors and one of the major European producers.

In 2021, Spanish paper output recovered from the prior 2.6% drop in paper production in 2020. In the current year, according to preliminary statistics, output totalled 1.78 million tonnes of pulp and 6.65 million tonnes of paper and board, making a total of 8.43 million tonnes produced by the domestic industry. These data are proof of the strength of this powerful, local and sustainable industry in our country. At the domestic level, apparent consumption of paper and board grew by 5% against the previous year overall, although the figures vary depending on product type.

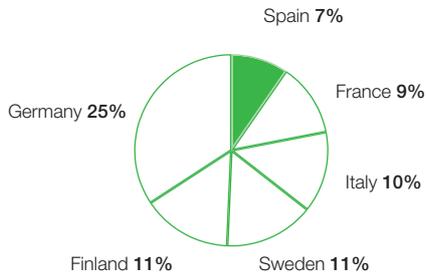
A €1.4 billion investment plan for 2021 to 2023 was implemented in 2021 to carry on driving the transformation of the Spanish paper chain into an international benchmark for the circular, decarbonised industry.

### TOTAL PAPER AND BOARD PRODUCTION (million t)

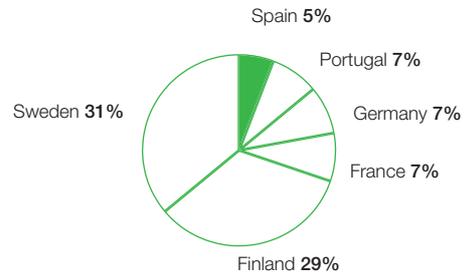


Paper and pulp manufacturing in the European Union (% of total EU output)

SPAIN IS THE 6TH LARGEST PAPER MANUFACTURER IN THE EU



SPAIN IS THE 6TH LARGEST CELLULOSE PRODUCER IN THE EU



**CONCLUSIONS ON THE MARKET CONTEXT AND THE IMPACT ON IBERPAPEL'S RESULTS**

- The post-pandemic economic recovery brings with it an increase in demand for paper and board products, boosting the industry's activity.
- Paper and board production in Spain rose by 6% compared to the previous year, reflecting the industry's stability.
- Despite being a benchmark sector for sustainability, it is undergoing a transformation just like other industries on the back of new market trends triggered by growing environmental concerns.
- In conclusion, production continued during the pandemic and the sector is recovering at a good pace.

**How is Iberpapel adapting to a changing industry?**

Iberpapel is among the most important companies in the paper market and is still a leader thanks to our efforts to understand and anticipate the trends that are constantly changing the path we follow. Due to growing concerns about the environment and climate change, these trends are increasingly shifting towards a more sustainable market model. With this aim, we strive for innovation so as to always offer the highest quality service while reducing our carbon footprint as far as possible.

### Circularity in the paper industry

The intrinsic circularity of the paper industry makes it one of the leading sectors in industrial decarbonisation. This is explained firstly by the fact that the main raw material comes from naturally renewable sources: forests, which are also natural CO<sub>2</sub> sinks. Another aspect of the industry's circularity is product recyclability. In Europe, the paper recycling rate is currently 74%, meeting the targets set every 5 years. A wide variety of forest-fibre-based products, such as cellulose and biofuels, can also be made from timber.

The European paper industry has pledged to achieve environmental neutrality by 2050 by relying on the manufacture of increasingly innovative products through industrial development, improved productivity and process efficiency.

The Iberpapel Group has aligned with European sustainability objectives by integrating the circular economy into our business model, eliminating fuels with high CO<sub>2</sub> emissions and reducing our carbon footprint. This means using more sustainable energy sources such as biomass and natural gas in our industrial activity.

The Group also seeks to improve energy efficiency through cogeneration, optimising the fuel used. This is a highly energy-efficient system that simultaneously generates heat and electricity from a natural gas combined cycle.

At Iberpapel we foster good practices in the use of raw materials, minimising and reusing waste in our value chain as a resource. For example, we contribute to circularity by always prioritising the reuse of waste in our own facilities or waste recovery in external facilities. We also have a recovery line in the pulp manufacturing process and we choose to work with legally and sustainably sourced timber as our raw material.



### Consumers choose environmentally friendly products

Growing concern about the environment and climate change has not only been reflected at the political level through the development of stricter guidelines and more ambitious policies, but has also impacted society. This has led to a paradigm shift towards more sustainable and responsible consumption, with consumers increasingly opting for environmentally friendly brands. According to an AECOC Shopperview study conducted in 2020, 44% of consumers have stopped buying certain branded products because they are not sustainable.

This, combined with the rise of digital commerce, is highlighting the consumer trend changes observed in recent years. The exponential escalation of online shopping is leading to exponential growth in demand for packaging, wrapping and labelling. To respond to these changing needs in a short period of time, the paper industry in Spain is working jointly to create new products to displace the use of plastic packaging.

In line with the changing market environment, Iberpapel is committed to innovation when developing new products. The following products are increasingly important: Baking paper, Vellum SC, Vellum TT, Zicubag, Zicubarrier, Zicuflex, Zicukraft, Zicupharma, Zicupharma HO, Zicusil and Zicusil SCK. Iberpapel remains fully committed to developing more new products.

### The importance of environmental certification

The consumer shift towards more responsible and sustainable practices highlights the need for environmental quality certification. Green certifications guarantee that a product is respectful of people and the environment, and can make a significant difference when competing with another product in the same market.

At Iberpapel, we integrate environmental commitment into our values, while striving to offer the highest quality service. With this aim, we have obtained two internationally recognised certificates: PEFC and FSC®, as well as a CO<sub>2</sub> sequestration certificate for our forests in Uruguay. We also work with chain-of-custody certified timber suppliers to ensure environmental well-being and the Group's integrity. We have ISO 140001:2015 environmental management certification underlying our environmental policy.



Forest restoration on the FSC® certified property "El Vinagre".

## THE PAPER INDUSTRY AND SUSTAINABILITY

Stakeholders that use the paper industry's products are increasingly aware of the environmental impact of paper generation and demand more functional products with a smaller associated carbon footprint. Consequently, Spain's paper industry has invested in new technologies and environmental management plans in recent years to become one of the most innovative sectors in the domestic economy.

As a result of these sustainability trends, responsible management of forests and plantations is increasingly important on a global level, as well as better use of the potential for a bioeconomy and circular economy in the paper industry, through inputs obtained from natural sources or waste.

Similarly, sustainable forestry management is the focus in Spain, by means of new green initiatives and processes that are more productive, efficient and responsible, assuring a lower environmental impact. The paper industry is seeking to build wealth and contribute to the quality of life of all stakeholders in the value chain, while encouraging society to move towards product recycling and reuse on the path to a sustainable future.

### Iberpapel believes in sustainable growth

At Iberpapel, besides demonstrating the quality assurance of our products through environmental quality certification, sustainable growth and environmental protection are fully integrated into the Group's strategy, forming part of the Company's values and culture.

Iberpapel's environmental commitment follows continuous improvement guidelines through the goals and objectives defined in our environmental policy. Our raw material comes from sustainably managed forests and excludes trees from natural forests, thus promoting timber plantations and related sustainable management. We contribute in this way to the Sustainable Development Goals (SDGs), including SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.

The Group is committed to investing in sustainable growth by increasingly reducing the carbon footprint associated with our manufacturing processes. This is illustrated by the fact that we produce considerably more paper than in 1990 but our environmental impact has been significantly reduced.

The Group also believes in the importance of environmental awareness, so we have integrated it into our Environmental Policy. We support employee training and engage employees to help us grow towards more efficient, productive and environmentally friendly processes.



Pruned 4-year-old  
*Eucalyptus grandis*

### 3.3 OUR STRATEGIC VISION AND OUTLOOK

GRI: 102-19, 102-20, 102-26, 102-32

Iberpapel and its subsidiaries are an integrated group engaged directly in all areas of the paper manufacturing process.

#### THE IBERPAPEL GROUP AT A GLANCE

Forestry activity	Cellulose fibre manufacturing capacity	Paper production and marketing capacity	Power generation	
<b>25,788</b> hectares of forest plantations in Spain, Argentina and Uruguay.	<b>240,000</b> metric tonnes of cellulose pulp installed capacity.	<b>250,000</b> metric tonnes of printing and writing paper.	<b>10 MWh</b> of electricity produced using our 20 MW biomass turbine.	<b>50 MWh</b> of gas power cogeneration installed capacity.

Iberpapel is an international integrated paper group formed by 17 companies: the parent company Iberpapel Gestión, S.A. and 16 wholly-owned direct or indirect subsidiaries, there being no non-controlling interests.



#### THE IBERPAPEL GROUP'S ACTIVITIES

- **Forestry activity**, through companies having their tax domicile in Spain, Uruguay and Argentina.
- **Industrial activity**, through Papelera Guipuzcoana de Zicuñaga, S.A.U.
- **Commercial activity**, through companies that sell paper in Spain, where approximately 50% of products are sold, and companies exporting the other 50%, mainly to Europe.

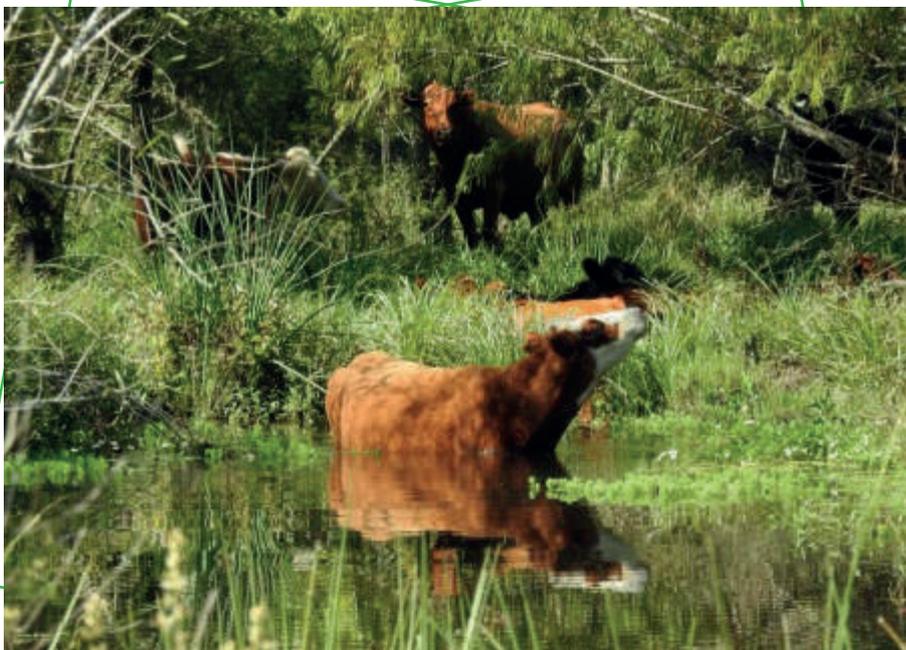
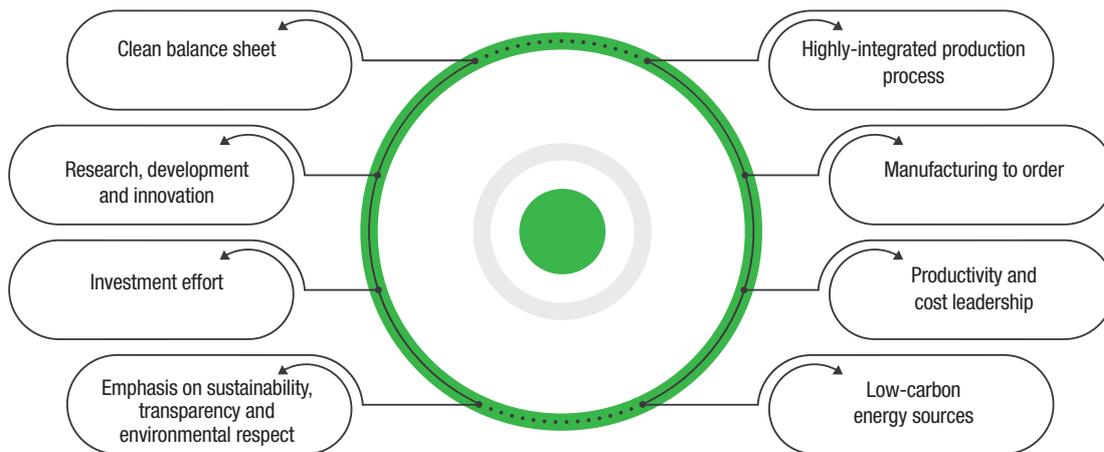
All the parent company's shares are listed on the Madrid and Bilbao stock exchanges.

## OUR BUSINESS MODEL AND STRATEGIC VISION

The success of our business model is based on a high level of integration of each of the production phases: timber, cellulose, paper and cogeneration. This provides a clear competitive advantage in terms of costs, all of which combines well with a highly flexible industrial and commercial set-up.

### Main strengths of our business model

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The Company's strategy is intended to consolidate efficiency, productivity and cost control, without forsaking growth, thanks to new investments made to increase production capacity, diversify products and boost growth in all our markets. The combination of these distinctive factors and our competitive advantages has brought a solid positioning in the industry and success in overcoming complicated market situations.

- **Clean balance sheet**

The Iberpapel Group has a sound financial situation assuring competitive shareholder returns while undertaking investments to stimulate future growth.

- **Highly-integrated production process**

The subsidiary Papelera Guipuzcoana de Zicuñaga, S.A.U. (PGZ) has two plants making paper and pulp. The pulp mill produces all the pulp needed in the paper mill. The company also has a biomass gas cogeneration power plant that supplies heat to the industrial process and electricity to the grid.

- **Make-to-order manufacturing**

Make-to-order production, allowing:

- > Improved pricing.
- > Guaranteed sale of all products.
- > High degree of customer satisfaction.

- **Productivity and efficiency leadership**

Insistence on cost control to boost productivity leadership.

- **Low-carbon energy sources**

- > Promoting energy technologies that have a lower environmental impact.
- > Implementing our Climate Change Policy.

- **Emphasis on sustainability, transparency and respect for the environment**

- > Commitment to integrating corporate social responsibility (CSR) into business strategy as a factor that enhances competitiveness and strengthens stakeholder confidence.
- > Pursuing Sustainable Development Goals through our three business divisions.

- **Investment effort**

- > Continuously investing throughout the Group's history, making annual improvements to the industrial and environmental technology used in facilities.

- **Researching, developing and innovating**

- > Constantly innovating in the search for new products that will bring growth opportunities.
- > Developing solutions to cut greenhouse gas emissions, such as the one implemented at Iberpapel's plantations in Uruguay.

These distinctive factors have allowed us to reach a good positioning in the industry and overcome exceptionally difficult market circumstances. We aim to consolidate our model's efficiency, productivity and cost control without losing sight of growth, thanks to new investments in production capacity and product diversification.

Our international vocation complements the growth strategy and has helped to reduce exposure to the economic situation. Exports and major investments in both industrial and forestry activities have brought considerable flexibility in the face of fluctuating supply prices, and optimisation of the customer portfolio and paper sales.



### PILLARS OF THE IBERPAPEL GROUP'S STRATEGY FOR 2022

GRI: 102-2, 102-4, 102-6

- The core focus of the Group's growth is a clear commitment to new product development, innovation and technology.
- Tight cost control.

## STRATEGY BY DIVISION

### • Forestry

In the coming years, the Forestry Division's strategy will still be focused on reforestation and conserving our forest assets. The logged timber will generally be sold in the local markets.

- > Maintaining the silvopastoral system in our South American plantations, integrated with the forestry business, combining the yield from forestry assets with respect for nature.
- > Consolidating the Genetic and Silviculture Improvement Plan and use of best technologies to achieve the highest quality timber and integration of forestry with wildlife.
- > Selling in local markets.

### • Industrial

In 2020, despite the economic and health situation, the subsidiary Papelera Guipuzcoana de Zicuñaga, S.A.U. successfully completed the modernisation and extension of its pulp mill. This included the implementation of new BATs (Best Available Techniques) and the use of more efficient, environmentally sustainable processes. Capacity was also increased to over 240,000 tonnes.

- > The strategy for 2020 will consist of optimising performance so as to produce high-quality, short-fibre cellulose (bleached eucalyptus kraft pulp) both for our paper plant and for possible sale to third parties.

### • Comercial

Expansion of the market for specialty papers and traditional products will continue in Spain and abroad, offering products with a greater projection and added value.

- > Growth in the specialty paper market to reach 30% of total paper sales and consolidate our position in traditional markets.
- > Selling of short-fibre pulp (bleached eucalyptus kraft pulp) to third parties, to the extent possible.

## INTEGRATION OF CSR INTO THE IBERPAPEL GROUP'S STRATEGY AND MANAGEMENT

The Corporate Social Responsibility Committee assists the Board in supervising the CSR strategy. It is formed by three members of the Board of Directors and is chaired by the independent director Jesús Alberdi Areizaga. The renewal, re-appointment and removal of committee members is the responsibility of the Board of Directors.

### Composition of the Corporate Social Responsibility Committee

- 
- Jesús Alberdi Areizaga, Chair
  - Néstor Basterra Larroude, Member
  - Rosa María Sanz García, Member
- 

As part of corporate social responsibility governance, this committee's primary objectives are to promote, among other aspects, the responsible development of the Group's core business, placing people at the centre; maximise sustainable value creation shared with our shareholders, other stakeholders and society as a whole; manage the risks and opportunities arising in the market responsibly; and maximise the positive impacts of the business on our local areas while preventing and minimising any negative impacts, as far as possible.

The committee met three times in 2021 to drive and guide Iberpapel's corporate social responsibility actions and report to the Board of Directors on the current situation.

The Corporate Social Responsibility Policy, approved by the Board of Directors in 2018, is a point of reference to define and drive behaviours that allow value to be generated within a culture of social responsibility through responsible development in all the Group's undertakings.

We also have policies setting out our commitments in key areas of financial and non-financial performance, such as the Anti-Corruption Policy addressing compliance, the Board of Director's Diversity Policy on social aspects or the Climate Change Policy reflecting our environmental pledges.

The latter policy recognises the impact of global warming on society and business, as well as related action areas. This policy has been fully integrated with the Group's strategic vision as a way to build value for stakeholders while enhancing business sustainability.

The plan prioritises a number of matters that Iberpapel regards as strategic, including energy efficiency, biomass energy recovery and CO<sub>2</sub> emissions removal by our plantations.

In the coming years, we will carry on implementing plans to develop policies already in place so as to ensure that both our corporate culture and our strategic direction are instilled with this policy. The goals set for 2022 include implementing a Responsible Procurement Policy.

Chapter 2 of this Report contains further details of our CSR approach and commitments.

## FUTURE PROSPECTS

In the coming years, we will carry on implementing plans to develop policies already in place so as to ensure that both our corporate culture and our strategic direction are instilled with this policy.

Iberpapel faces new market challenges from a privileged position, since the Company has been capable of adapting to market needs thanks to its strategy and the competitive advantages of its business model. As an example, 30% of paper sales relates to specialities developed in recent years.

During the period 2017-2020, the Group invested some €80 million to increase production capacity and modernise the pulp mill. The latest technological developments and Best Available Techniques (BATs) applicable to cellulose manufacture were also included in the pulp mill renovation.

## 3.4 INVESTMENT AND INNOVATION IN THE IBERPAPEL GROUP

GRI: 203-1

### A HISTORY OF CONTINUOUS INVESTMENT AND INNOVATION

Iberpapel understands that the key to assuring sustainable growth is to commit to the continuous improvement of processes, investing in activities that enhance our competitiveness so as to do business in a manner that is efficient, integrated and oriented towards stakeholder value generation.

During the period 2000-2021, the most significant investments in the Industrial Division were the extension of paper production capacity, which began in 2000 with a new paper machine and continued with the pulp mill extension in 2002, the construction of a 50 MWh gas cogeneration plant in 2008 and the pulp mill modernisation in 2020.

This significant investment in improving the production unit will doubtless have a very positive impact on the quality of our paper and the competitiveness of our products.

As regards innovation, the Commercial Division has diversified from our traditional products in recent years, the main new offerings being: Zicubag (paper for bags with high mechanical resistance), Zicubag GR (greaseproof paper), Zicuflex Baking (packaging paper), Vellum SC (label face) and Zicupharma in reels and formats (paper for leaflets).

In the Forestry Division, the main investment was made in 2010, when €10 million was spent to buy new forest land in order to position the business in the south east of Uruguay.



#### LATEST SUCCESS STORY

Commissioning of the extension and modernisation of the pulp mill (2017-2020), which became operational in the third quarter of 2020.

- Investment: **€80 million.**

Main improvements 2000-2021

2000	2001-02	2006-08	2012-13	2017-20
€60 million	€64.5 million	€45 million	€16.5 million	€80 million
Extension of the paper mill.	Pulp mill renovation and extension.	Construction of a 50 MW gas cogeneration plant.	New effluent treatment plant and new water treatment system.	Pulp mill renovation and extension, "Hernani Project"

In a context of constant changes, Iberpapel has managed to adapt and harness its potential to undertake major projects that will boost competitiveness in the coming years.





### LATEST SUCCESS STORY 2020

#### Modernisation of Papelera Guipuzcoana de Zicuñaga's pulp mill

Papelera Guipuzcoana de Zicuñaga, S.A. reformed the cellulose production plant in order to modernise the facilities and increase bleached eucalyptus kraft pulp production capacity up to 240,000 tonnes/year.

Environmental aspects were enhanced by including new best available techniques (BATs), as set out in the BREF document on the production of pulp, paper and board, drawn up on the basis of Industrial Emissions Directive 2010/75/EU.

### TECHNOLOGICAL SCOPE OF THE CHANGES

The renovation affected virtually all the pulp mill facilities although, in view of its relevance, the main task was the replacement of the old continuous wood cooking digester with a new state-of-the-art digester able to produce the high-quality, short-fibre kraft pulp required for our paper machines.

Changes were also made in the treatment and washing plant, the black liquor recovery boiler and the caustification plant.

#### Main changes made:

##### FIBRE LINE

- New digester:
  - New blow tank.
    - > Vapour reboiler system to reduce odorous gases.
    - > Oxygen delignification.
    - > Renovation of the treatment and washing plant.
    - > Auxiliary pulp purification and washing line including a washing filter and thickener press for the manufacture of unbleached pulp.
  - Auxiliary items and equipment needed for the proper functioning of the facilities, such as circulation pipes and pumps, electrical installation, transformation and engine control centre, CCM, instruments and control equipment.
  - New distributed control system (DCS).
  - Improvement of the odorous gas elimination system by increasing the recovery points and capacity of the treatment system.

##### RECOVERY LINE

- Renovation of the evaporation plant
- Renovation of the recovery boiler
- Renovation of the caustification plant

## ENVIRONMENTAL IMPACTS OF THE RENOVATION

The latest technological developments and best available techniques (BATs) applicable to cellulose manufacture were also included in the pulp mill renovation. These techniques have been approved by the European Commission and apply to all facilities in Europe.

As a result of the pulp mill renovation, efficiency has been increased in terms of the consumption of timber and chemical products. The quality of the cellulose produced has also improved.

PGZ has implemented a comprehensive system to collect and treat diffuse emissions associated with the characteristic kraft plant smell. This considerably reduces the odorous effect on the environment, in comparison with other European plants.

The pulp mill modernisation process was used to make new environmental improvements. The reduction of odorous emissions during the process was a core aspect during the design and engineering of the new facilities.

In 2021, operations in the new facilities were consolidated and the auxiliary unbleached pulp line was commissioned, although production did not begin. The facilities were completed by adding the necessary circuits and equipment so that 30%-dried bleached pulp can also be delivered.



### 3.5 THE IBERPAPEL GROUP'S BUSINESS

GRI: 102-2, 102-4, 102-6.

#### BUSINESS STRUCTURE

The Group has more than 80 years of history and experience in the paper industry. It has an integrated production approach comprising three divisions that span the entire paper value chain, from source (Forestry Division) through the raw material transformation processes (Industrial Division) to marketing (Commercial Division), thus maximising value and synergies between the divisions so as to boost competitiveness.

#### MAIN FIGURES BY DIVISION

FORESTRY DIVISION	INDUSTRIAL DIVISION	COMMERCIAL DIVISION
6,117 ha. Spain	240,000 t/yr Pulp mill	€181.90 million Paper
19,671 ha. South America	Energy section (cogeneration) 50 MWh gas / 20 MWh <sup>1</sup> biomass	€51.44 million Energy
	250,000 t/yr Paper mill	€3.89 million Timber

<sup>1</sup>20MWh production



### SOLID INTERNATIONAL PRESENCE THROUGH OUR THREE DIVISIONS:

We have a solid international presence through our three divisions:

 **COMMERCIAL AGENTS:** EUROPE AND AFRICA

 **FOREST PLANTATIONS:**  
Argentina and Uruguay. SOUTH AMERICA  
La Palma del Condado (Huelva). SPAIN

 **INDUSTRIAL PLANT:** Hernani (Guipúzcoa). SPAIN

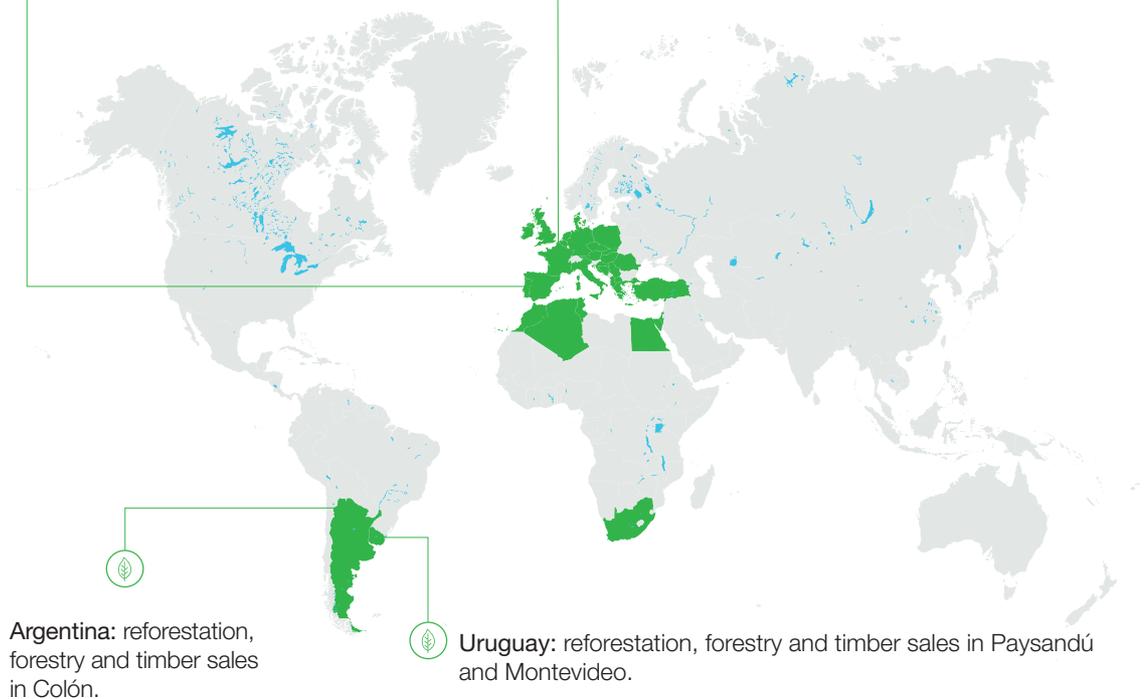
#### SPAIN

 **Forest plantations:**  
La Palma del Condado (Huelva).

 **Industrial plant:**  
Hernani (Guipúzcoa).

 **Divisions and commercial agents:**  
Barcelona, Irún, Madrid, San Sebastián  
and Seville

 **Commercial agents in Europe and Africa:** Albania | Germany | Algeria | Austria | Belgium | Bosnia | Croatia | Denmark | Egypt | Slovakia | Slovenia | France | Greece | Hungary | Ireland | Italy | Macedonia | Morocco | Netherlands | Poland | Portugal | United Kingdom | Czech Republic | Romania | San Marino | Serbia | Tunisia | Turkey | Israel | South Africa.



### IBERPAPEL, A SUCCESS STORY:

**1935-1941:** Although Papelera Guipuzcoana de Zicuñaga, S.A.U. was incorporated on 24 October 1935, business did not commence until 1941, with the manufacture of cellophane paper.

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**1947:** Installation of a paper machine with a width of 2.20 metres and a production capacity of 2,000 t/yr.

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**1958:** Installation of a second paper machine and two static fibre boilers with a capacity of 75 m<sup>3</sup>, achieving an annual output of 14,000 t/yr of cellulose pulp.

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**1971:** Commissioning of a new cellulose facility and modernisation of the paper machines to reach an annual production capacity of 35,000 t/yr.

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**1975:** Start of the forestry project in Huelva.

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**1978:** Closing down of the cellophane plant and retraining and reassignment of personnel to paper production, without the need for any large-scale redundancies.

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**1979:** Commissioning of a new paper machine, dismantling the old machine number 2. This entailed extending and optimising the cellulose plant, resulting in a production increase year after year.

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**1988:** Start of the forestry project in Argentina and Uruguay.

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**1997:** 21/07/1997 Incorporation of Iberpapel Gestión, S.A.

28/11/1997 The Company's stock is admitted to trading on the stock exchange.

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**2000:** Commissioning of paper machine number 4, boosting paper production capacity by 250%.

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**2003:** Extension of the cellulose plant, increasing its production capacity by more than 90%.

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**2008:** Commissioning of the 50 MW cogeneration plant, entailing an investment of €45 million.

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**2011:** The Group begins to build a new biological treatment plant and outlet, entailing an investment of €16.4 million.

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**2013:** The Group begins to build a new biological treatment plant and outlet, entailing an investment of €16.4 million.

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**2015:** Cellulose production increase at the Hernani plant and a sound performance in the forestry area.

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**2017:** Our sound financial structure allows us to launch the Hernani Project as a key to the Group's growth.

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**2018:** Start of a new phase of growth.

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**2019:** Phase one of the "Hernani Project": renovation and modernisation of the cellulose plant.

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**2020:** Completion of the extension and renovation of the cellulose plant, despite the economic and health crisis caused by Covid-19.

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**2021:** Consolidation of the new pulp mill and energy crisis.

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### 3.5.1 FORESTRY DIVISION

#### SUSTAINABLE FOREST MANAGEMENT: A KEY FACTOR

The aim of forestry management is to obtain the maximum yield from our plantations under the strictest sustainability criteria.

In the past decade, interest in protecting and managing forest masses has grown thanks to increased awareness of their role in the global carbon cycle and direct and indirect benefits for society. So all agents are channelling their efforts into sustainable forest management, which consists of organising, conserving and sustainably developing the world's forests.

These efforts were reflected in the Paris Agreement on Climate Change approved by 195 countries on 11 December 2015, formally recognising the decisive role of forests and trees in reducing greenhouse gases (GHGs) accumulating in the atmosphere, promoting sustainable management, favouring conservation and disapproving deforestation. The United Nations 17 Sustainable Development Goals (SDGs) approved in 2015 include sustainable forest management in "Goal 15 Life on land", stipulating 12 specific targets for 2030.

*"Forests are vitally important for sustaining life on Earth, and play a major role in the fight against climate change. The 'State of the World's Forests 2020' highlights that, since 1990, some 420 million hectares of trees have been lost to agriculture and other land uses. "Investing in land restoration is critical for improving livelihoods, reducing vulnerabilities, and reducing risks for the economy."*<sup>1</sup>

<sup>1</sup>Source: Sustainable Development Goals, SDG 15: Terrestrial Ecosystem Life, UN, 2021



Forests and trees support sustainable agriculture because, among other aspects, they stabilise soils and climate, regular water flows and provide shade, shelter and a habitat for pollinators and the natural predators of agricultural pests. When integrated into agricultural land, forests and trees boost productivity. They also help to provide food security for hundreds of millions of people for whom they are important sources of food, energy and income in difficult times. Recognising these reciprocal benefits and finding a balance between them will allow those in charge to design policies that will improve resources so as to speed up 2030 Agenda achievements.

The State of the World's Forests report explains that deforestation, mainly caused by the conversion of forest land into agricultural and livestock farmland, not only jeopardises the sectors that benefit in some way from the forest community but also seriously impacts the variety of life on the planet. Changes in the use of land aggravate the loss of habitats, soil erosion, decline in clean water sources and release of carbon into the atmosphere, so finding the formula to increase agricultural production and enhance food security without reducing forest areas is one of the great challenges of our time.



**SDG 15:** Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.

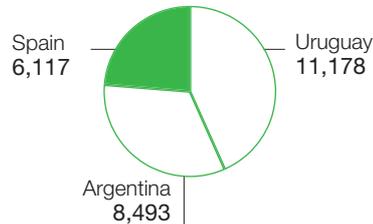


### THE FORESTRY DIVISION IN DETAIL

We currently have total forest assets of 25,788 hectares, of which 19,671 hectares (76%) are located in South America. At year-end 2021, our forest assets were distributed as shown in the chart.

#### DISTRIBUTION OF FOREST ASSETS 2021

(hectares/country)



Our Group works mainly with *Eucalyptus globulus ssp globulus Labill* or white eucalyptus from the Iberian Peninsula. The timber is purchased from producers on the Cantabrian Coast and in Portugal. According to the latest Eucalyptus Forestry Report on Galicia and the Cantabrian Coast, eucalyptus plantations play an important role in sustainable development, generating environmental and socioeconomic impacts.

- **Environmental impact:** as stated in the above-mentioned report, the eucalyptus plantations on the Cantabrian Coast are genuine carbon sinks, absorbing more carbon than they expel, thus reducing the amount of carbon in the atmosphere and, ultimately, contributing to mitigating climate change.
- **Socioeconomic impact:** eucalyptus plantations contribute to rural development in the Iberian Peninsula, generating 5,972 direct jobs and 18,872 indirect jobs<sup>2</sup>.

<sup>2</sup> Source: ASPAPEL Sustainability Report, 2020

“Agriculture and forestry have been and still are crucial activities for the use and management of natural resources in rural areas, as the basis for the socioeconomic development of these areas, for environmental conservation and thus for the diversification and promotion of rural development”<sup>3</sup>

<sup>3</sup> Source: Eucalyptus Forestry Report on Galicia and the Cantabrian Coast

Iberpapel is aware of the vital importance of sustainable forest management in our industry, timber being our essential raw material in paper manufacture. Our sustainability criteria are designed to guarantee the growth and persistence of forest masses and associated values. We continuously promote the optimisation of production processes in harmony with the conservation of the environment, sustainable resources and local community integration. In line with this philosophy, the Company has defined the following forest management guidelines:

- Gradual incorporation of improved genetics at source.
- Preparation of land prioritising soil conservation using best available techniques.
- Implementation of silvopastoral systems, integrating prior land uses, traditionally livestock farming, into forestry projects.
- Recovery of soil productivity by creating meadows and improving them continuously through the planting of fodder species, weed control and stabilisation using rill to combat rainwater erosion.
- Commitment to reduce the use of agrochemicals.

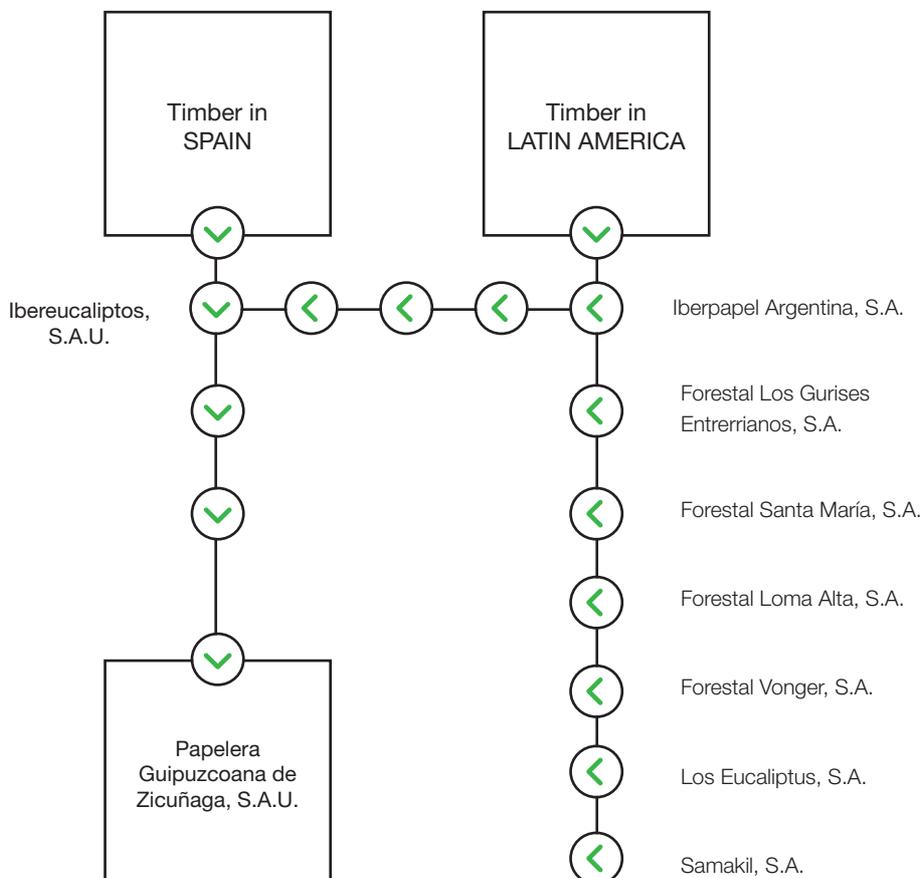
In Uruguay, our forestry production system has brought recognition from government bodies and the approval of forestry projects submitted, the majority of which have been classed as Artificial Protective Forests in view of their social, environmental and economic benefits. The latest forest property to obtain this recognition was "El Flaco", at the end of 2014.

Latin America is at the head of the developing areas in the promotion of private investment in forests. The high proportion of privately owned forests in the region is one of the driving factors behind this trend. These countries were also pioneers in the use of fiscal instruments, particularly payments for environmental services (or ecosystems), designed to encourage more suitable environmental management.

Other strategies employed in the area include the creation of specific national forestry funds and the promotion of new partnerships through portfolio approaches to raise funds. Argentina and Uruguay, as countries in the Southern Cone, are very well positioned to leverage the advantages of being low-cost timber producers compared with traditional producers in the northern hemisphere. Forest areas in Uruguay and Argentina total around 2 million hectares. In Argentina, they are concentrated mainly in the Misiones, Corrientes and Entre Ríos provinces. In Uruguay, they are distributed equally across the northern, west coast, central, north eastern and south eastern zones.

In order to reduce dependence on forest supplies from the Iberian Peninsula and increase self-sufficiency, Iberpapel designed an expansion plan in South America. In 1988, we purchased our first property in Argentina, and one year later in Uruguay, embarking on our forestry activity in Latin America.

THE FORESTRY DIVISION'S STRUCTURE



## IBERPAPEL GROUP'S MAIN INVESTMENTS

### Spain

- **1975:** The project to acquire assets in Huelva begins with the purchase of 264 ha in two properties, El Naranjal and Sierra del Águila.
- **1975-1980:** In the first five years, 3,554 ha were acquired in 26 properties in the province of Huelva, in the Sierras de Aracena and Andévalo areas.
- **1982-1983:** Three more properties were acquired in Sierra de Aracena totalling 599 ha.
- **1983-1984:** Two important adjoining properties were purchased in the Campiña de Huelva area. Assets in Spain reached a stable 6,117 ha.
- **2004:** The association Asociación de Productores Onubenses de Madera (APOM) was formed together with several owners, providing coverage for timber producers. This forestry association is now an association of highland owners covering all the other produce of the properties.
- **2013:** Forestry management is certified under FSC standards with registration code GFA-FM/COC-002538-C for all the assets.
- **2021:** Pilot test of exemplary restoration with cork oak trees in a burnt area, using an innovative self-watering system to guarantee the survival of the plants even in periods of severe drought.

### Latin America

- **1988-1989:** Acquisition of forest land in the Uruguayan departments of Colón and Concepción, Entre Ríos in Argentina and the department of Paysandú in eastern Uruguay.
- **2005:** Start of strategic positioning in the south east of Uruguay.
- **2007:** Los Eucaliptus, S.A. obtains general authorisation from the government to own forest land in Uruguay.
- **2008:** Los Eucaliptus, S.A. obtains FSC® forestry management certification for its assets.
- **2010:** Forest land in south east Uruguay reaches 10,000 hectares in the departments of Canelones, Lavalleja and Maldonado.
- **2011:** Membership of the Rio Uruguay Forestry Consortium in Argentina.
- **2012:** Validation of the carbon sequestration project in Uruguay.
- **2013:** Planting of eucalyptus species for solid wood uses begins in Argentina.
- **2014:** Marketing of timber from the south of Uruguay begins.
- **2015:** Trials with new species in both countries. Membership of the SPF in Uruguay.
- **2016:** A cooperation agreement was signed in Uruguay with the departmental government of Canelones.
- **2017:** Entry as a member of the Uruguayan Forest Fire Protection Plan (PAIF Group).  
Presentation of the Biodiversity Management Plan in Argentina for the creation of a Native Forest Private Nature Reserve.
- **2018:** Los Eucaliptus, S.A. renews FSC® forestry management certification for its assets.
- **2019:** Our forestry assets in Argentina are UY20/81841041 certified by PEFC/CERFOAR.
- **2020:** Los Eucaliptus, S.A. begins to trade in carbon bonds.

Forest areas in Uruguay and Argentina: [http://www.spf.com.uy/forestacion zonas forestadas/#](http://www.spf.com.uy/forestacion_zonas_forestadas/#)



### OUR GENETIC AND SILVICULTURE IMPROVEMENT PLAN

The plan was launched in 1994 with the aim of applying the best technologies to obtain the highest quality timber and integrate forestry with the protection of natural systems while allowing and encouraging forest grazing. The implementation of this plan has allowed a substantial increase in the timber's volume and morphological quality.

The plan began with the selection of superior *Eucalyptus globulus*, obtained from different locations and with diverse characteristics. These trees show high adaptability and natural rusticity, the main advantage of which is higher productivity per surface unit.

Our strategy involves reforesting the most suitable areas with these superior trees and trees obtained from select seeds. Less suitable zones are planted with other more appropriate eucalyptus species so as to optimise land usage. In both cases, the best forestry techniques are applied to maximise productivity per surface unit and increase sustainable timber production.

Having established the general lines of action, the plans are adapted to each of the areas in which we have plantations.

In Argentina, the forestry business was diversified by adding new species of eucalyptus with other wood properties besides cellulose properties, such as *Eucalyptus Grandis Hill ex Maiden*, which has various solid wood uses, as the main species, and *Eucalyptus dunnii Maiden* as a secondary species.

In Uruguay, a reforestation project began in 2005, planting *Eucalyptus Globulus* forests on very severely eroded soils, combined with silvopastoral activities. It was conducted in forest plantations in the departments of Canelones, Maldonado and Lavalleja, covering an area of 4,691 forest hectares.

This project also involves the absorption of CO<sub>2</sub> emissions through forest masses, which act as sinks for greenhouse gases. In order to calculate and monitor CO<sub>2</sub> removal as a result of this project, we previously developed a specific methodology approved by the United Nations under the name AR-ACM0001 (Afforestation and Reforestation of Degraded Land), which is now applied to other forestry projects not only in Uruguay but also in Brazil, Chile, China, India and the Democratic Republic of the Congo. It is the first consolidated methodology to be approved for the forestry industry.

Through this project, we are contributing to the SDGs and sustainable development in Uruguay, including the following environmental achievements:

### CERTIFICATION OF CO<sub>2</sub> REMOVAL AT OUR URUGUAYAN PLANTATIONS UNDER THE INTERNATIONAL VCS

#### Economic benefit



4,691 forest hectares

#### Environmental benefit



657,311 t CO<sub>2</sub> emissions absorbed

#### Social benefit



Knowledge sharing with local communities



FSC-certified management systems



Contribution to the local community by creating jobs

## Biological assets

Iberpapel's biological assets comprise forest plantations. The Group classifies its biological assets based on their physical and geographic characteristics, the basic unit of biological assets being the "batch", that is the set of biological assets (same species and same year planted) associated with a certain plot of land which have common physical features.

As the main physical characteristics when defining batches, the Group takes into account the species of the biological asset and its level of maturity, as the basic value parameters.



### BASIC FEATURES OF BATCHES

As indicated, geographical location and common physical properties are stated for each batch of biological assets.

The main characteristics are:

- **Species:** the biological asset species identifies the different families of a group of biological assets (trees).
- **Quality:** a characteristic that identifies the differing qualities of each species (seed, clone).
- **Average annual increment (AAI):** the value that establishes the annual growth of biological assets for each batch, estimated based on measurements by technical personnel and statistical data.
- **Degree of maturity:** a code that identifies the degree of the asset's biological transformation:
  - › **Immature:** those that are not ready to be harvested.
  - › **Mature:** those that are ready for harvesting or picking, or are able to support regular production, harvesting or picking.
  - › **Agricultural product:** products obtained through processing or picking mature biological assets.

## Biological assets

Thousand euro	2021	2020	2019	
Immature	16,315	14,527	16,362	
Mature	2,783	1,793	1,803	
<b>Year-end</b>	<b>19,098</b>	<b>16,320</b>	<b>18,165</b>	

### 3.5.2 INDUSTRIAL DIVISION

Iberpapel has become a benchmark in the printing and writing paper production sector thanks to our industrial and environmental technology, supported by ongoing investment.

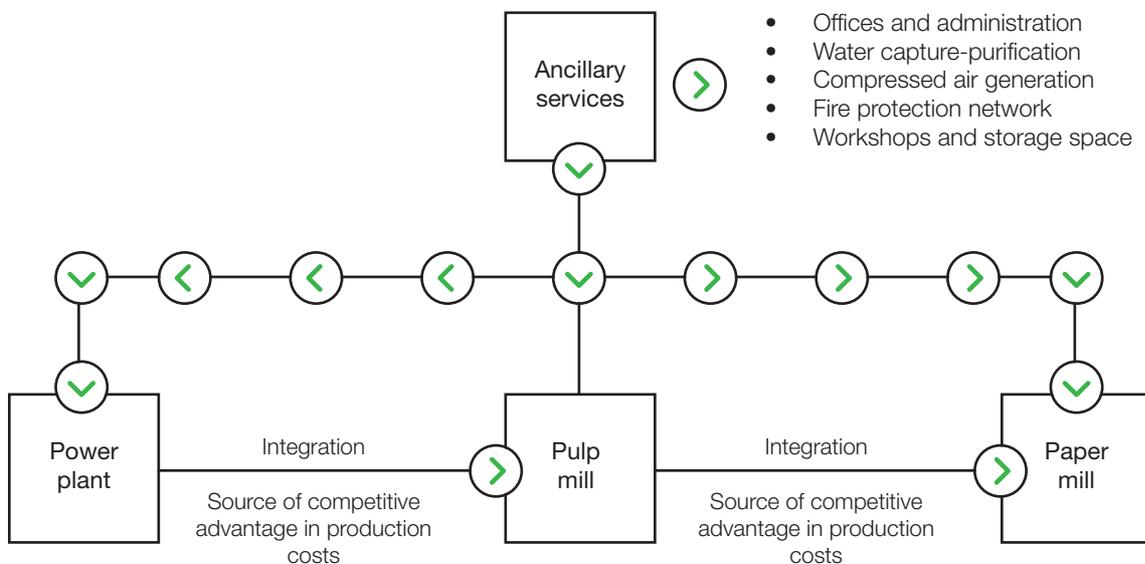
The Industrial Division is responsible for transforming raw materials into finished products. The production unit where this activity is carried out comprises the plant in the town of Hernani, in Guipúzcoa province. This division accounts for most of our employees and our largest investment projects.

#### THE INDUSTRIAL DIVISION AT A GLANCE

The Hernani facility comprises two integrated plants, one making cellulose pulp and the other paper, so that our paper is made using pulp produced by the same plant, plus a power plant.

- In the pulp mill, eucalyptus timber is used to make the cellulose pulp needed in the paper mill. In the paper mill, the final products, mostly printing and writing paper, are obtained from the pulp. Other specialty papers are also produced to a lesser extent.
- The energy required to operate the pulp and paper mills is obtained from the renewable energy cogeneration plant, which uses black liquor biomass and a highly efficient combined gas cycle to generate thermal energy that powers the facility and electricity that is fed into the grid.

#### STRUCTURE OF PGZ (PAPELERA GUIPUZCOANA DE ZIGUÑAGA)



### CELLULOSE PLANT

Before being brought to the mill in lorries, the bark is removed from the eucalyptus timber. Directly from the truck, or in some cases from storage, the timber is taken to the chipping station where it is transformed into small chips that are fed into a continuous wood cooking digester.

The chips enter the digester together with NaOH (caustic soda) and Na<sub>2</sub>S (sodium sulphide or lye). Once inside, the wood and alkali mix is cooked at temperatures of up to 150° for a preset period of time. It is a continuous process as the chips enter the digester and the cooked timber leaves the digester without interruption.

In the digester, the fibres or pulp and bleaches are separated. The separation process is not complete as the pulp contains residual bleaches and a certain amount of organic matter from the timber (lignin) that explains its viscosity and characteristic dark colour, as well as the name “black liquor”.

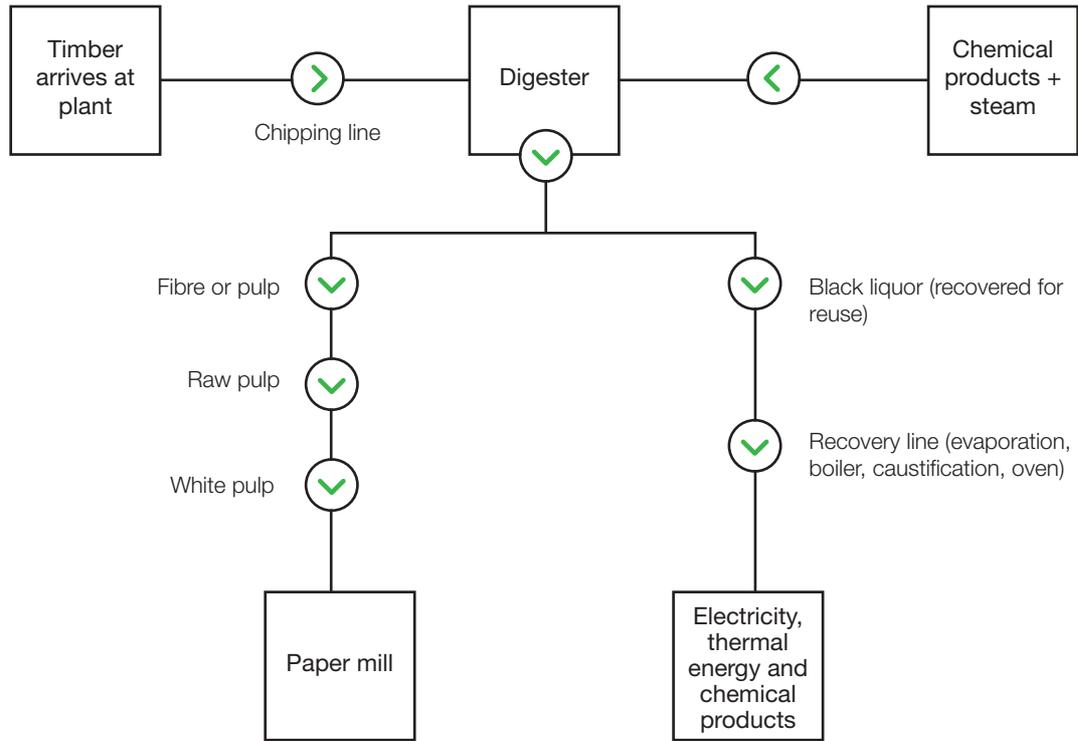
The cooked wood undergoes a coarse sieving process to separate the uncooked components, followed by a washing and delignification process. Finally, the material is purified and then washed to ensure that any remaining bleach is removed. The product resulting from these processes in the raw cellulose pulp production stage is called raw pulp and is stored in a silo. The raw pulp is further treated in the bleaching plant by means of an ECF (elemental chlorine free) process in which the lignin residues are removed from the pulp. Finally, after a final purification of any foreign elements that may remain in the material, white pulp suitable for paper production is obtained.

The black liquor obtained in the digester is concentrated in the evaporation plant. The organic content of the black liquor, mainly wood lignin, is combusted in the boiler to produce high-pressure steam, which is redirected to a turbine to generate electricity that is fed into the grid. In addition, as part of this recovery line, the steam coming out of the turbine is used in the pulp mill to boil the wood and concentrate the black liquor, among other functions, and to heat the cylinders that dry the sheets in the paper machines.

The inorganic part of the black liquor that is not burned during combustion is recovered in the form of molten ore, consisting mainly of Na<sub>2</sub>CO<sub>3</sub> (sodium carbonate) and Na<sub>2</sub>S (sodium sulphide). This continues along the recovery line to the caustification plant, where CaO (lime) is added to obtain the lye needed for wood cooking in the digester. The CaO in turn comes from the lime kiln, where it is made from CO<sub>3</sub>Ca, a by-product of the recovery process.



PULP MILL DIAGRAM

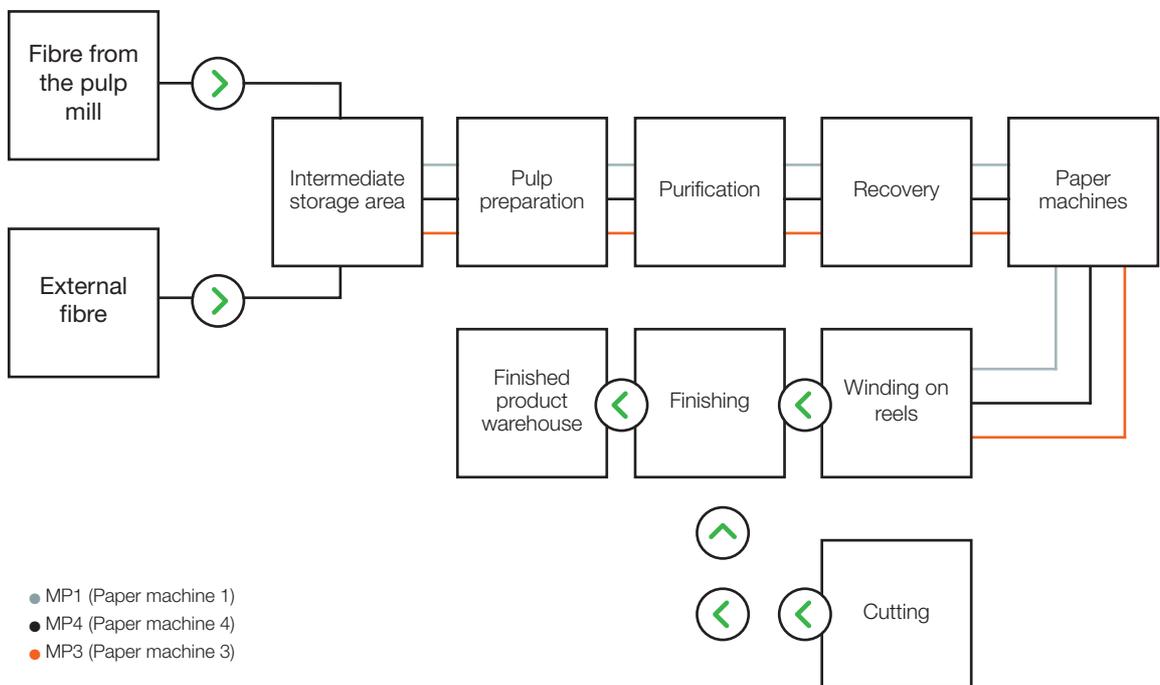


### PAPER MILL

The paper mill has three independent production lines, each of which comprises a pulp preparation and purification section, a fibre and water recovery section, a paper-milling machine and two reel winders.

The three independent production lines and the double rewinding line in each of them ensure the necessary flexibility for our manufacturing system, which is essential in order to produce "qualities" and "to-order". This gives us a competitive advantage, setting us apart from other paper manufacturers with a similar or even higher total output.

### PAPER MILL STRUCTURE



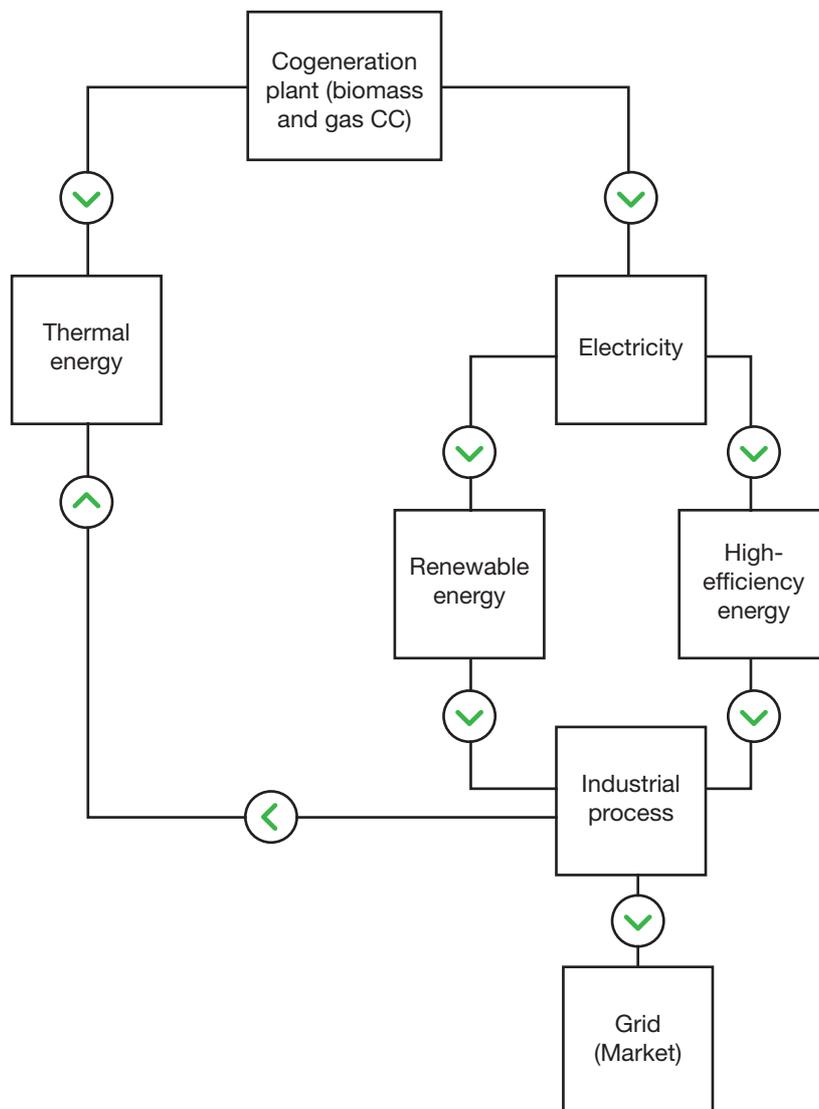
### POWER PLANT

In the mill, we have a black liquor renewable energy cogeneration plant and a highly efficient gas combined cycle. This supplies the thermal energy (steam) required in the industrial process and we generate electricity that is fed into the grid under an all-inclusive scheme.

The power plant comprises:

- Auxiliary or power boiler.
- Biomass cogeneration (black liquor) using a 20 MW back-pressure steam turbine.
- Gas cogeneration combined cycle generating 50 MW of electricity using a gas turbine, a gas-recovery boiler and a steam turbine.

#### POWER PLANT DIAGRAM (cogeneration)



### 3.5.3 COMMERCIAL DIVISION

The Commercial Division is responsible for managing the sale and distribution of our products.

We have identified a number of key factors explaining our competitive advantages, which include proximity to our customers and in-depth knowledge of competitors and the market:



#### MAIN COMPETITIVE ADVANTAGES

- Manufacturing to order so as to offer a top-quality product by creating an efficient production process.
- Diversified customer portfolio, thereby mitigating risks of concentration in one geographic area or group of customers.
- Competitive prices that meet customers' expectations.
- Speedy decisions thanks to our commercial management.
- Ongoing search for market opportunities, offering our customers new products and entering new markets.
- Personalised customer service.
- Comprehensive knowledge of the business and customers, assuring a quality service and long-standing commercial relationships.
- Flexible production process thanks to the integration of all phases.
- Leading Spanish producer of uncoated paper.



### COMMERCIAL DIVISION'S MAIN STRATEGY: KEY POINTS

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- Diversifying production into segments that show the most growth potential, particularly those related to packaging, labelling, food and healthcare sectors.
- Diversifying our portfolio through presence in different markets so as to minimise the risk of losing important customers, adverse circumstances in a specific market and the possibility of being easily displaced by competitors.
- Adapting to current demand, offering a broader product range, seeking segments with the best growth potential, markets with added value and market niches that provide higher profitability.
- Building and preserving long-term commercial relationships with our customers.
- Supporting their industrial processes, providing a personalised service and building sufficient trust to become their main supplier.
- Taking out credit insurance to cover virtually all of our paper sale transactions.
- Making most sales in euros so as to avoid foreign exchange risks.

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 **The Iberpapel Group has agents covering the following countries:** Albania, Germany, Austria, Belgium, Bosnia, Croatia, Denmark, Egypt, Slovakia, Slovenia, France, Greece, Hungary, Ireland, Italy, Macedonia, Morocco, Netherlands, Poland, Portugal, United Kingdom, Czech Republic, Romania, San Marino, Serbia, Tunisia, Turkey, Israel and South Africa.

We are a benchmark in southern Europe's traditional printing and writing paper markets.

We have sales offices in San Sebastián, Irún, Madrid, Barcelona and Seville.

We work with sales representatives, who do not form part of the corporate structure, in most European countries, the north of Africa and South Africa.



## OUR CUSTOMERS

Our customer portfolio essentially includes companies that use paper as their main raw material with which the Company has a solid, long-term relationship. The Company's track record, spanning over 80 years, instills in our clients a feeling of confidence in our capabilities as their current and future supplier.

The loyalty of our customer portfolio and our flexible commercial policy allow us to maintain a diversified sales structure. These lasting commercial relationships reflect our customers' satisfaction with the service received and the high quality of the products we make. In terms of quality assurance, our products are ISO 9001 and ISO 14001 certified, PEFC and FSC® certified and have been granted the German ISEGA BfR XXXVI recommendation attesting to suitability for contact with food.

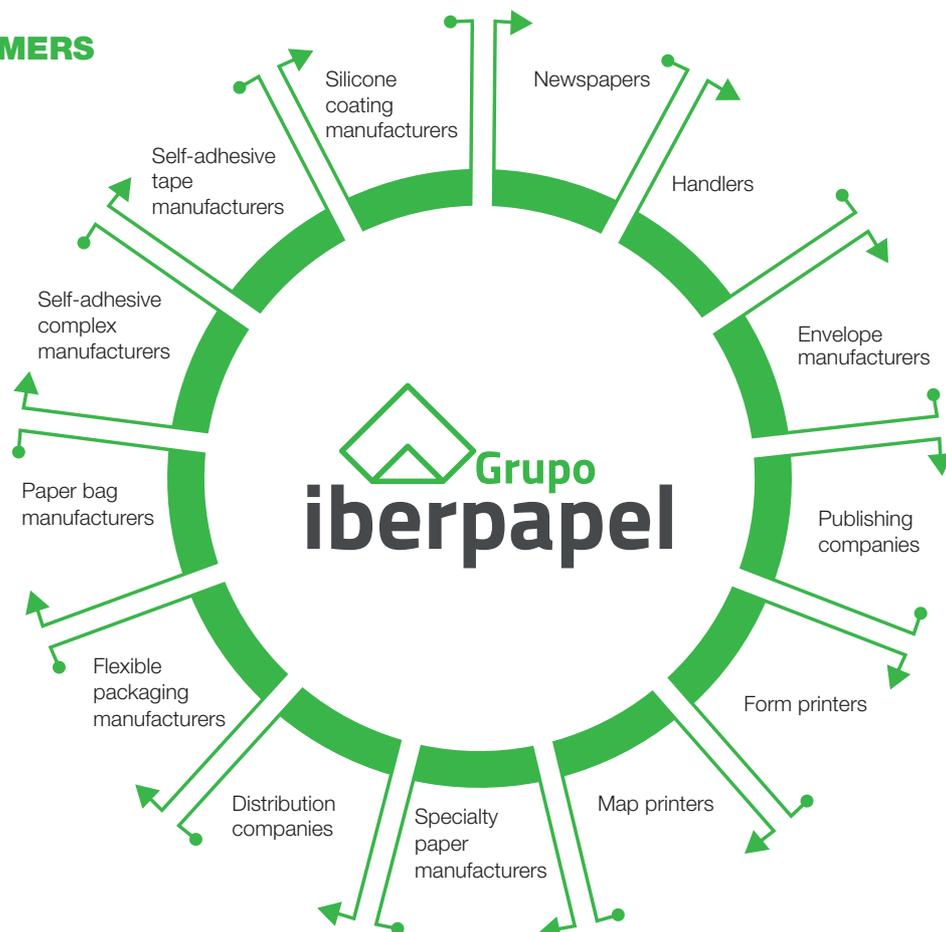
We operate in both domestic and international markets, with consolidated business in Spain, France and Portugal, where we leverage geographic proximity, although our products are also sold in other European countries and the north of Africa. Furthermore, new products with different qualities are sold worldwide and we currently have operations in the Asian and Latin American markets.

The Company's track record, spanning over 80 years, instills in our clients a feeling of confidence in our capabilities as their current and future supplier.

We remain focused on innovation and the continuous search for new products with high added value to extend, complement and diversify our market presence.

**In 2021, nearly 30% of sales related to specialty products, which we aim to consolidate in 2022.**

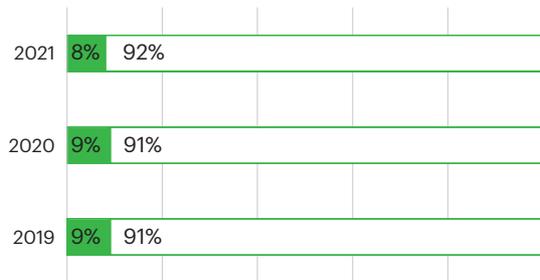
## MAIN CUSTOMERS



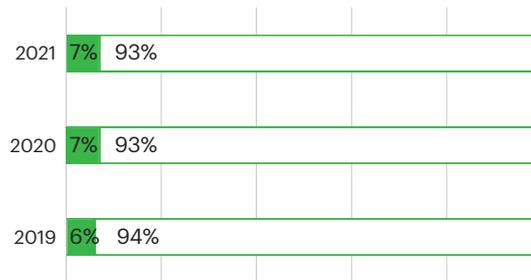
IBERPAPEL'S CUSTOMERS AT A GLANCE

■ Less than 5 years  
 □ More than 5 years

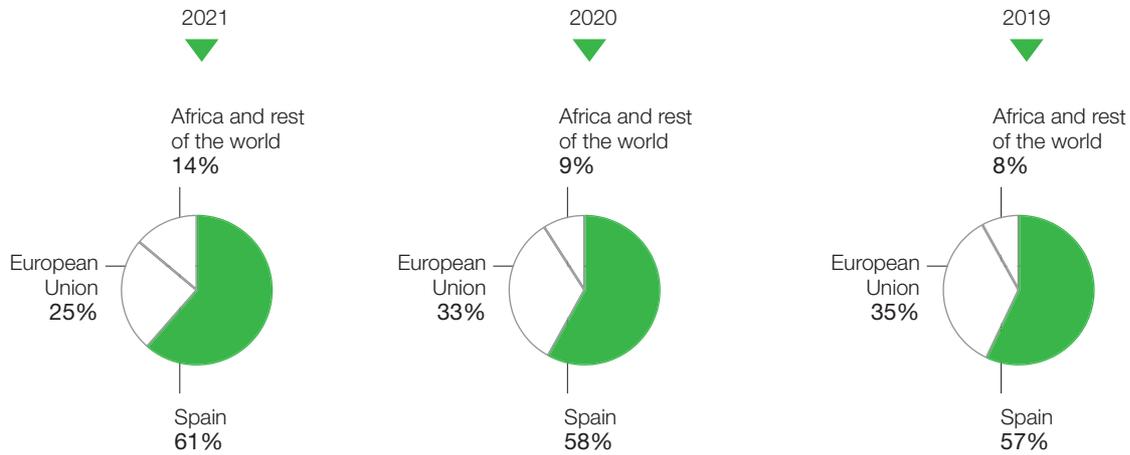
Age of domestic customers



Age of international customers



Geographic distribution of revenue



61% of paper sales are made in Spain, 25% in the European Union and 14% in Africa and the rest of the world.

Iberpapel has long-standing customers (more than 5 years), assuring stability.

In Spain, we have long-term relationships with 92% of customers.

Internationally, long-term customers account for 93% of the total.

## OUR PRODUCTS (product | paper type | grammage)

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- > **BAKING PAPER:** support for silicone coating for baking. **40-50 gr.**

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- > **CARDBOARD:** high whiteness or coloured paper for folders, dossiers, etc. **100-210 gr.**

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- > **COPYSTAR:** high whiteness paper for multi-function reprographics. **80 gr.**

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- > **COPYRIGHT:** high whiteness paper for multi-function reprographics. **80 gr.**

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- > **ECO+:** PEFC certified paper for multi-function reprographics. **75-80 gr.**

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- > **GO:** extra high whiteness paper for multi-function reprographics. **80 gr.**

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- > **LASER PREPRINT:** specialty laser paper. **70-100 gr.**

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- > **SILK PAPER:** very fine paper used as wrapping in the textile industry or for luxury products. **25-30 gr.**

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- > **SUBLIMATION PAPER:** paper used as transfer paper or as protection in the textile industry. **30-50 gr.**

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- > **K0 OFFSET PAPER:** high volume paper for publishing, adding machine rolls and sundry applications. **60-120 gr.**

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- > **VELLUM SC:** label face. **35-75 gr.**

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- > **VELLUM TT:** self-adhesive label face for thermal transfer printing. **68-73 gr.**

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- > **ZCOPY:** high whiteness paper for multi-function reprographics. **75-80 gr.**

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- > **ZICUBAG:** paper for bags. **60-130 gr.**

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- > **ZICUBAG GR:** greaseproof packaging paper. **35-60 gr.**

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- > **ZICUBAG GR SLIP EASY:** greaseproof paper with slip easy treatment for cupcake or muffins cases, etc. **32 gr.**

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- > **ZICUBARRIER:** water barrier and greaseproof paper. **50-70 gr.**

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- > **ZICUFLEX:** paper for packaging. **35-60 gr.**

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- > **ZICUKRAFT:** highly-resistant white kraft paper for construction, food complex, packaging, etc. markets **70-90 gr.**

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- > **ZICULAX:** specialty laser paper. **70-90 gr.**

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- > **ZICUMAIL:** offset paper for envelopes. Automatic and manual enveloping. **70-100 gr.**

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- > **ZICUPHARMA:** paper for printing information leaflets for the pharmaceutical industry, standard finish. **40-60 gr.**

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- > **ZICUPHARMA HO:** highly opaque paper for printing information leaflets for the pharmaceutical industry. **37-50 gr.**

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- > **ZICUSET:** white offset paper for publishing and printing. **50-140 gr.**

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- > **ZICUSIL:** support for low grammage silicone coating. **35-60 gr.**

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- > **ZICUSIL SCK:** support for silicone coating treated to optimise label removal. **45-60 gr.**

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## BUDGETING AND PLANNING

The Group prepares a sales plan combining budgets for short- and long-term volumes based on our experience and market knowledge, customers' needs and our strategies. We take a number of factors into account when writing our budgets, such as changes in market conditions, production and storage capacities and the development of new products.

The goal of the entire process is to use our resources, raw materials, energy, space and personnel as efficiently as possible in order to adequately meet our customers' needs.

## DISTRIBUTION

In the paper industry, the distribution process has a highly significant impact on results. It is therefore essential to obtain an optimal combination of cost management and logistical efficiency in order to provide a service tailored to our customers' needs. We always select the most competitive method of transport depending on the destination, prioritising land transport for domestic sales.

As regards transport safety, we involve all our carriers, demanding assurance that all vehicles and drivers meet legal requirements. Similarly, we fulfil related legal obligations by obtaining safety commitments from the transport companies, reminding them of their responsibility to secure the load and reserving our right of inspection.

We assure transportation and distribution capacity through a considerable number of carriers in each geographic zone to which products are shipped. The proper distribution of work among these carriers is vital to meet volume and cost targets.

As a result of the process followed to select and assess logistics providers, our group contracts all the activities to leading companies, which are required to accept direct liability. We involve our providers in a continuous improvement process to reduce the number of incidents, this being the Company's direct goal. We inspect vehicles before loading, rejecting those that do not fulfil our requirements to carry our paper, since security and quality are present in all our activities.

In the distribution process, it is essential to obtain an optimal combination of cost management and logistical efficiency in order to provide a service tailored to our customers' needs.

We involve our providers in a continuous improvement process to reduce the number of incidents, this being the Company's direct goal.

### PAPER DISTRIBUTION BY MEANS OF TRANSPORT (finished products % of total)

Year	DOMESTIC MARKET			EXPORT MARKET		
						
2021	93.94%	-	6.06%	81.03%	2.89%	16.08%
2020	98.93%	-	1.00%	72.49%	7.30%	20.21%
2019	99.00%	-	1.01%	69.70%	7.40%	22.90%



**4**

# **OUR SOCIAL RESPONSIBILITY**



## 4.1 MANAGEMENT APPROACH TO CORPORATE SOCIAL RESPONSIBILITY (CSR)

### 4.1.1 CSR COMMITMENT AND INTEGRATION IN OUR CORPORATE STRATEGY

At Iberpapel, we maintain our firm pledge to act responsibly so that our activity is respectful to people and the environment. In this spirit, we adhere to the Sustainable Development Goals as basic principles to bring an end to poverty, protect the planet and guarantee peace and social stability, among other aspects.

In the Iberpapel Group, we consider that sound management of the various aspects of Corporate Social Responsibility enhances our competitiveness and helps to meet stakeholder expectations and demands. We have therefore integrated Corporate Social Responsibility into our business strategy. This is based on three key pillars:



#### KEY PILLARS OF THE IBERPAPEL GROUP

- **Environmental**  
Environmental responsibility
- **Stakeholders**  
Responsibility to stakeholders (employees, suppliers, customers, etc.)
- **Good Corporate Governance**  
Good Corporate Governance pledge

Thanks to these pillars, the Group assures the integration of CSR and sustainability into our business strategy and all activities, from good corporate governance and fair remuneration for shareholders and investors to sustainable management of forest resources, promotion of sustainable purchasing and continuous improvement of our environmental performance, including employee training and occupational safety, among other aspects.

This integration of CSR and sustainability into strategy and management starts at the highest management level, since the definition of the corporate purpose has to address how the organisation creates value in the long term, and this cannot exclude ESG (Environmental, Social and Governance) aspects, including responsible behaviour, accountability and information transparency.

This is in response to all our stakeholders' expectations, as we overcome new challenges, adapt to new trends and try to contribute, through our business, to a better future.

The Corporate Social Responsibility Committee allows us to guarantee that our promises to society and the environment are fully incorporated into our corporate strategy and that ground is gained every year.



### FORMAL CONFIRMATION OF OUR CORPORATE SOCIAL RESPONSIBILITY PLEDGE

Our belief in these aspects is supported by the Corporate Social Responsibility Policy, which lays down the general principles governing our sustainable behaviours and, more specifically, defines essential and specific principles covering the different areas of CSR and our stakeholders.

Chapter 4.2 analyses in more depth the Iberpapel Group's stakeholder relationships and the dialogue channels that allow us to improve and adapt to their needs.

#### 4.1.2 THE IBERPAPEL GROUP: COMMITTED TO THE SUSTAINABLE DEVELOPMENT GOALS (SDG)

The Group's activities have various positive impacts that help to achieve the Sustainable Development Goals (SDG) set in the United Nations 2030 Agenda. The SDGs are a call to action for all countries, including the public and private sectors, to promote prosperity and protect the planet. Integrating ESG practices into business operations can also contribute to SDG progress by prioritising the link between profitability, productivity and environmental and social sustainability principles.

The Iberpapel Group's impacts on the most significant SDGs related to the business are described briefly below:



#### GOOD HEALTH AND WELL-BEING

Expenditure on occupational risk prevention activities and resources in 2021 totalled €1,256 thousand.

#### Guaranteeing a healthy life and promote well-being for all

Iberpapel actively promotes occupational health and safety, one of our main CSR commitments. So, the Group's priority in 2021 was the safety of our employees, customers, suppliers and all those with whom we come into contact in our daily activities, applying all the health protection measures recommended by experts and authorities. These measures to combat the pandemic were complemented by the market best practices implemented year after year under our Occupational Risk Prevention Management System (SIGPRL) in order to assure our employees' safety, health and well-being.

#### Main contributions:

- Implementation in PGZ of an Occupational Risk Prevention Management System (SIGPRL), certified by an independent external expert.
- Installation in PGZ of a comprehensive Occupational Risk Prevention Management Computer System (Prosafety).
- Development in PGZ of a facility inspection plan and an observation procedure to ensure safe behaviours by employees.
- Integration of all executives, middle managers and supervisors into PGZ's own prevention team.
- Mandatory examinations for the Group's workers.
- ISO 45001 certification.



## AFFORDABLE AND CLEAN ENERGY

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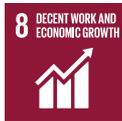
Biomass and gas cogeneration  
60MWh

Guaranteeing access to affordable, safe, sustainable, modern energy for all

The Iberpapel Group actively encourages the use of renewable energies and efficient facility management. This is reflected in our commitment to clean energy and clean technologies.

### Main contributions:

- Supply from our own gas and biomass cogeneration plants, avoiding over 165,802 tonnes of CO2.
  - Development of the Energy and Climate Change Programme, which promotes energy efficiency and the use of biomass as an alternative to traditional fossil fuels.
  - Implementation of an Energy Management System under ISO 50001, certified externally by an independent expert (DNV).
- 



## DECENT WORK AND ECONOMIC GROWTH

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94.20% of contracts are permanent  
2.10% v. 2020

Promoting sustained, inclusive and sustainable economic growth, full and productive employment, and decent work for all

Iberpapel offers employees a work environment committed to respect, stability and occupational safety.

We also implement work-life balance measures, valuing the importance of our employees' personal life so they can perform their work to be best of their abilities. Our pledges include creating stable, quality jobs in the local community. Iberpapel did not implement temporary lay-off measures (ERTE) in 2020 or 2021.

### Main contributions:

- A stable workforce of 293 employees, 94.20% on indefinite contracts.
  - Promotion of training for employees, totalling 8,057 hours in 2021.
  - 254 work-life balance actions amounting to over 4,015 hours.
  - Workloads in line with working hours, assuring employees' right to disconnect.
-



## INDUSTRY, INNOVATION AND INFRASTRUCTURE

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An investment of around €80 million in the pulp mill renovation came to an end in 2020.

**Building resilient infrastructures, promoting inclusive, sustainable industrialisation and fostering innovation**

We focus on innovation and technology to increase productivity and enhance customer service. These projects allow us to adapt to customers' needs and maximise value creation for all our stakeholders.

### Main contributions:

- Completion of the modernisation and extension of the cellulose pulp production plant, which was commissioned in the third quarter of 2020, bringing in new BATs (Best Available Techniques) and more efficient, environmentally sustainable processes.
  - New products: Zicubag in reels and formats (paper for bags with high mechanical resistance), Zicubag GR in reels and formats (greaseproof paper), Zicuflex reels and Zicuflex Baking (packaging paper), Vellum SC (label face) and Zicupharma in reels and formats (paper for leaflets).
  - All our forest assets are certified.
- 



## RESPONSIBLE CONSUMPTION AND PRODUCTION

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71% of waste is reused

**Guarantee sustainable approaches to consumption and production**

We promote the rational, respectful use of natural resources.

Iberpapel promotes the circular economy and bioeconomy by fostering the recycling and reuse of biochemical products, the reuse of waste and energy efficiency in our plants.

### Main contributions:

- Harnessing of the potential of the bioeconomy and the circular economy in the paper industry, based on practices that reduce production inputs by reusing waste and biological resources.
  - Responsible and sustainable forest management, guaranteeing absolute traceability for customers under the FSC® and PEFC systems.
-



## CLIMATE ACTION

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165,802 tonnes of CO<sub>2</sub> emissions saved thanks to cogeneration and biomass

### Adopt urgent measures to combat climate change and its effects

Besides sustainable forest management certified by internationally recognised organisations, Iberpapel helps to mitigate climate change by producing power using gas and biomass cogeneration. Iberpapel is also active in atmospheric CO<sub>2</sub> removal by issuing VCUs (Verified Carbon Units) at our plantations in Uruguay.

### Main contributions:

- Environmental Management System under the ISO 14001:2015 standard, certified by an independent third party (DNV).
  - Certification of the removal of over 657,311 tonnes of CO<sub>2</sub> through the issuance of VCUs at our plantations in Uruguay
  - Environmental awareness-building in all our workers.
  - General training of all employees in environmental management.
- 



## LIFE ON LAND

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90% custody chain certified timber suppliers  
100% forest assets FSC® or PEFC certified

Promote the sustainable use of terrestrial ecosystems, combat desertification, halt and reverse land degradation and halt biodiversity loss.

We seek to use forest resources sustainably and responsibly, guaranteeing future viability. Best practices include the promotion of silvopastoral systems that help to preserve the local area and generate considerable social and environmental benefits, the promotion of projects in voluntary carbon markets and forestry certification for all our forest assets and the timber supplier custody chain.

### Main contributions:

- Use of a raw material that is natural, sustainable and fully renewable.
  - Promotion of timber plantations and responsible management.
  - Low-carbon energy consumption and waste reuse.
  - Our afforestation of degraded land using silvopastoral systems was selected by the Uruguayan government for presentation to the Committee on Forestry (COFO) at the FAO meeting in Italy.
-

### SUSTAINABLE DEVELOPMENT GOALS

All the Sustainable Development Goals (SDGs) are interrelated. So, although the business is directly related to those mentioned previously, the Group promotes sustainability in all areas and contributes to all 17 Sustainable Development Goals.

Our contribution to the SDGs are described in the following chapters:



REPORT CHAPTERS												
1. Chairman's Letter												
2. Iberpapel at a Glance												
3. Our Group	●	●	●	●	●	●	●	●	●	●	●	●
4. Our Corporate Social Responsibility	●			●	●	●		●	●	●		
4.2 Stakeholder dialogue commitment												●
4.3 Responsibility to our people	●	●			●		●					
4.4 Responsibility to our customers								●				
4.4 Responsibility to our suppliers								●				
4.4 Responsibility to our local community		●			●							●
5. Our Environmental Responsibility				●				●	●	●		
6. Our Corporate Governance			●		●						●	
7. Our Results					●							

## 4.2 STAKEHOLDER DIALOGUE COMMITMENT

### 4.2.1 MANAGEMENT APPROACH TO STAKEHOLDER DIALOGUE

GRI: 102-21, 102-40

We place great importance on close and continuous communication with all the stakeholders and entities that make our Company's success possible. We can only overcome the challenges that the future brings and create the most possible sustainable, shared value if we take into account the needs and expectations of our stakeholders and include them in our business strategy.

Our stakeholder relationships follow the recently approved Stakeholder Relations Policy. Just like the Corporate Social Responsibility Policy, this policy helps to heighten the Company's commitment to good corporate governance and sustainability in line with our values and principles.

The Group is convinced that it is not possible to combine social interests with a responsible, sustainable business model without considerable stakeholder engagement.

As the policy indicates, stakeholder relationships are based on transparent communication, mutual trust and continuous two-way communication. This allows us to integrate social, environmental, governance, ethical and human rights concerns in our daily activities and relationships through communication channels that are permanently available and undergo constant improvements.

To effectively apply our approach, all stakeholders that may affect or be affected by our business were first identified on the basis of economic, social and environmental impacts.

Secondly, we prioritise stakeholder groups by studying to what extent they are capable of influencing our business, the type of pre-existing relationship with the stakeholders and how they are aligned with the Company's strategic objectives, while also analysing our impacts on them.

Following identification and prioritisation, channels are opened to communicate and understand their perspectives and expectations. So, the design of these channels takes into account both the profile of each group and the aspects that are relevant in relation to our business, pursuing a dual purpose: facilitate and improve the amount and quality of two-way communication with stakeholders.

We have created different two-way communication channels to receive and respond in a personalised manner to their concerns and expectations, with the aim of ensuring their satisfaction.



The Group is convinced that it is not possible to combine social interests with a responsible, sustainable business model without considerable stakeholder engagement.

Main channels open with our stakeholders:

**CUSTOMERS**

**Contact and dialogue**

- Personal visits to customers and by customers to our premises.
- Telephone, videoconference and email contacts.
- Industry magazines, publications and websites.
- Quality control system (ISO 9001:2015).
- Online shopping portal: [www.iberpapelonline.es](http://www.iberpapelonline.es)

**Relevant expectations and aspects**

- Personalised service.
- Responsible, efficient management.
- Transparency and permanent communication.
- Fulfilment of delivery terms.
- High quality, environmentally responsible and innovative products.

**SUPPLIERS**

**Contact and dialogue**

- Visits by suppliers to our premises and by Iberpapel to their premises.
- Industry presentations, meetings and conventions.
- Industry magazines and publications.
- Continuous telephone and e-mail contact.
- Quality control system (ISO 9001:2015).
- Raw material traceability.
- Corporate website: [www.iberpapel.es](http://www.iberpapel.es)
- Technical contacts with suppliers to develop new products, new uses, new raw materials, etc.

**Relevant expectations and aspects**

- Fulfilment of contracts and commitments.
- Transparent commercial activities.
- Cooperation and collaboration.
- Reliable, timely payments.

**EMPLOYEES**

**Contact and dialogue**

- Periodic meetings with the Works Committee and dialogue with unions represented.
- Health and Safety Committee.
- Equality Committee.
- Vertical communication channels. Communication channels under the SIGPRL (Internal Occupational Risk Prevention Management System).
- Training process.
- Employee induction process.
- Whistleblower hotline integrated with the Criminal Risk Prevention System.
- Mutual insurance company for occupational accidents and illnesses.
- Accident insurance company.

**Relevant expectations and aspects**

- Equal opportunities.
- Stability and working conditions.
- Life-work balance.
- Career development.
- Occupational health and safety.
- Dialogue and transparency with management.

**ENVIRONMENT**

**Contact and dialogue**

- Regular participation in environmental forums:
  - › Environmental Committee of ASPAPEL (Spanish association of pulp, paper and board manufacturers).
  - › Environmental Committee of the Basque Paper Industry Cluster Association.
  - › Water Planning Committee.
- Citizen Participation in the Water Board of the Eastern Cantabrian Water Zone.
- Committees and work groups of the Confederation of European Paper Industries (CEPI).
- Supply of technical-environmental information to customers.

**ENVIRONMENT**

**Relevant expectations and aspects**

- Transparency and dialogue with related organisations.
- Environmental in environmental conservation plans.
- Reduction of the environment impacts of the Group's activities.
- Presence in decision-making forums on upcoming European environmental regulations.

**SHAREHOLDERS,  
INVESTORS  
AND THE  
FINANCIAL  
COMMUNITY**

**Contact and dialogue**

- Annual report, quarterly and half-yearly reports.
- Conference call to announce results, open to all market professionals.
- General Shareholders' Meeting.
- Corporate website: [www.iberpapel.es](http://www.iberpapel.es)
- Shareholders and investors:
  - › Fact sheet.
  - › Corporate presentation.
  - › Press releases.
  - › Dedicated e-mail address: [atencion.al.accionista@iberpapel.es](mailto:atencion.al.accionista@iberpapel.es)
  - › Investor Relations Department.

**Relevant expectations and aspects**

- Transparent, smooth dialogue.
- Relevant information.
- Value generation and distribution.
- Impact management.
- Harnessing of financial opportunities.
- Good governance and risk management.
- Share value.

**REGULATORS  
AND  
ASSOCIATIONS**

**Contact and dialogue**

- Cooperation with government bodies at the local, regional, autonomous and national levels.
- Domestic and international industry associations such as:
  - › CEPI (Confederation of European Paper Industries).
  - › ASPAPEL (Spanish association of pulp, paper and board manufacturers).
  - › Basque Paper Industry Cluster Association.
  - › EURO-GRAPH (European Association of Graphic Paper Producers).
  - › BASKEGUR (Basque Timber Association).
  - › Bolsa de Papel (<http://labolsadepapel.com>).

**Relevant expectations and aspects**

- Service, quality and efficiency.
- Transparency in activities.
- Innovative and effective solutions to new challenges.
- Productive and responsible partnerships.
- Compliance with legislation and regular reporting obligations.
- Awareness of upcoming legislative developments from the drafting stage onwards.

**SOCIEDAD**

**Contact and dialogue**

- Websites: [www.iberpapel.es](http://www.iberpapel.es) / [www.iberpapelonline.es](http://www.iberpapelonline.es)
- B2B (Business-to-Business).
- Social action plan to encourage educational development in our local communities.
- Commitment to employment and sustainability.
- Participation in the "Thank you paper" campaign.

**Relevant expectations and aspects**

- Transparency regarding the company's activities.
- Economic and social impacts on the community.
- Community engagement.
- Ethical business actions.
- Plant safety and community protection.
- Contribution to the United Nations Sustainable Development Goals.

### 4.2.2 ACCESSIBILITY OF IBERPAPEL'S INFORMATION

GRI: 102-40, 407-1

Transparency is a key aspect of management. So we make information available to all our stakeholders as required by law and voluntarily to foster a full understanding of the Group's operations and other aspects that are relevant to potential users, such as economic and environmental, social and governance (ESG) matters.

We post all financial (annual reports, annual accounts, etc.) and non-financial information on our website. The "Social Responsibility" tab contains disclosures on our stakeholder commitments as regards ESG, which may also be consulted in the Company's annual reports.

In view of our belief in transparency, we aim to make our corporate website contents totally accessible to all our stakeholders.



## 4.3 RESPONSIBILITY TO OUR PEOPLE

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### 4.3.1 RESPONSIBILITY TO OUR CUSTOMERS AT A GLANCE

#### 2021 MILESTONES

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- Successful completion of the ISO 45001 audit of the industrial subsidiary PGZ.
  - Reduction in absenteeism due to illness and accidents thanks to the new health and safety measures implemented by PGZ.
  - Computerisation of the Human Resources Department for people management and training.
  - Reinforcement of the Occupational Risk Prevention Management Computer System (Prosafety) at all levels.
  - Programme of inspections to assure safety conditions.
  - Covid-19 protocol including preventive, organisational and health measures.
  - Negotiation of non-stop shift agreements for 2021 to 2025.
- 

#### FUTURE CHALLENGES

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- Promote the hiring of young professionals to have the best talent.
  - Retain talent.
  - Adapt attendance control at the plant.
  - Maintain a stable working climate and improve industrial relations.
  - Reaffirm the Equality Plan 2020-2025.
  - Consolidate the existing Health and Safety Management System under the ISO 45001 standard.
  - Negotiate the provincial collective bargaining agreement.
- 

#### MAIN METRICS AND TRENDS FOR 2021 > **Our performance in 2021**

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<b>293</b>	<b>94.20%</b>	<b>9</b>	<b>8,057</b>
-1.35% vs. 2020	+2.10% vs. 2020	-10% vs. 2020	-10.38 vs. 2020
Number of employees	% indefinite contracts	No. of disabled employees	Training hours

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## OUR MAIN CONTRIBUTION TO THE SDGs

**GOAL 3.4**

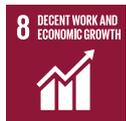
Reducing non-communicable diseases and mental health

Aware of the importance of our employees to the organisation, one of our ethical principles addresses health and safety. In 2021, we applied all the measures needed to protect our employees from Covid-19. These initiatives are in addition to those already implemented in recent years, such as the Occupational Risk Prevention Management System in the industrial subsidiary PGZ, which meets ISO 45001:2018 standard requirements, as certified externally by the independent entity Det Norske Veritas (DNV).

**GOAL 4.3 | GOAL 4.4**

Ensure equal access to higher education  
Increase employability skills

In the changing society in which we live, being prepared is increasingly an essential requirement. Aware of the challenge that this entails, we strive to adapt to the new changes through a broad offering of training alternatives and various methodologies. In 2021, 170 training actions were undertaken for a total of 8,057 hours, which is well below pre-pandemic years due to the application of the Covid-19 Protocol, limiting the possibility of face-to-face meetings and courses.

**GOAL 8.5 | GOAL 8.6 | GOAL 8.8**

Achieve full employment and decent work  
Reduce the proportion of youth not in employment or education  
Protect labour rights and promote safe working environments

We are committed to promoting a good work climate and improving industrial relations. We provide our employees with stable, quality work, as reflected in the high ratio of indefinite contracts and work-life balance measures. This became even more important in 2020 and 2021 when, despite the difficulties caused by the Covid-19 pandemic, Iberpapel did not implement temporary lay-off measures (ERTE).

**GOAL 10.2**

Promote social, economic and political inclusion

The principles applied in recruitment and selection processes are founded on respect for equal opportunities and non-discrimination by reason of age, gender, disability, race, origin, religion or economic situation, or any other condition. The Group promotes social inclusion. In 2021, disabled employees accounted for 3.07% of our workforce, which was below the previous year due to a retirement.

### 4.3.2 OUR PEOPLE MANAGEMENT

GRI: 102-8, 103-2, 103-3, 405-1, 407-1

#### PROFILE OF THE IBERPAPEL GROUP'S EMPLOYEES

Recognising that human resources management is a key aspect of our strategy, since only excellent people management will make us stand out from other companies, stable, lasting employment relationships are encouraged, as reflected in our stable average workforce in recent years. At present, 39% of our employees have been with us for over 20 years and 94% have indefinite contracts.



Human capital is a key, distinctive factor in our Group. Their professionalism, coupled with their commitment and values, make Iberpapel the leading company in our industry today and will be a key aspect of this leadership going forward.

Iberpapel's team is currently formed by 293 employees in three countries (Spain, Argentina and Uruguay). They are divided into four professional categories encompassing a highly varied spectrum, given the diversity of the Group's 17 companies operating in the forestry, industrial and commercial sectors.

Despite the variety that may be found in our workforce, all the employees share the Group's values and principles and are aligned with its objectives.

#### Workforce highlights

At the year end (31 December 2021), the Group has 293 employees, 1% below 2020. The average age is 47 and the majority are aged between 40 and 49. Virtually all our employees are located in Spain.

Mutual respect and trust have assured a relatively stable average workforce in recent years, which reflects our employees' commitment to and satisfaction with our work philosophy. 94% percent of Iberpapel's employees have indefinite contracts thanks to our policy designed to instil the maximum trust and promote a pleasant working climate.

## Employees by gender and country (no.)

Country	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
Spain	252	255	21	22	273	277
Uruguay	10	9	2	2	12	11
Argentina	4	5	4	4	8	9
<b>Total</b>	<b>266</b>	<b>269</b>	<b>27</b>	<b>28</b>	<b>293</b>	<b>297</b>

## Employees by gender and professional category (no.)

Professional category	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
Board directors	2	1	-	-	2	1
Executives	17	18	1	1	18	19
Technicians and administrative staff	75	72	22	21	97	93
Operators and specialists	172	178	4	6	176	184
<b>Total</b>	<b>266</b>	<b>269</b>	<b>27</b>	<b>28</b>	<b>293</b>	<b>297</b>

## Employees by gender and age (no.)

Age groups	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
From 19 to 29	16	22	1	-	17	22
From 30 to 39	39	34	2	2	41	36
From 40 to 49	94	105	13	14	107	119
From 50 to 59	90	85	9	8	99	93
Over 60	27	23	2	4	29	27
<b>Total</b>	<b>266</b>	<b>269</b>	<b>27</b>	<b>28</b>	<b>293</b>	<b>297</b>

## Types of employment contract by gender, age and professional category (no.)

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
<b>Indefinite contracts</b>						
Board directors	2	1	-	-	2	1
Executives	17	18	1	1	18	19
Technicians and administrative staff	70	63	20	21	90	84
Operators and specialists	162	174	4	6	166	170
<b>Total</b>	<b>251</b>	<b>246</b>	<b>25</b>	<b>28</b>	<b>276</b>	<b>274</b>

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
<b>Indefinite contracts</b>						
From 19 to 29	10	14	-	-	10	14
From 30 to 39	33	22	1	2	34	24
From 40 to 49	91	102	13	13	104	115
From 50 to 59	90	85	9	9	99	94
Over 60	27	23	2	4	29	27
<b>Total</b>	<b>251</b>	<b>246</b>	<b>25</b>	<b>28</b>	<b>276</b>	<b>274</b>

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
<b>Temporary contracts</b>						
Technicians and administrative staff	5	9	2	-	7	9
Operators and specialists	10	14	-	-	10	14
<b>Total</b>	<b>15</b>	<b>23</b>	<b>2</b>	<b>-</b>	<b>17</b>	<b>23</b>

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
<b>Temporary contracts</b>						
From 19 to 29	6	8	1	-	7	8
From 30 to 39	6	12	1	-	7	12
From 40 to 49	3	2	-	-	3	2
From 50 to 59	-	1	-	-	-	1
Over 60	-	0	-	-	-	-
<b>Total</b>	<b>15</b>	<b>23</b>	<b>2</b>	<b>-</b>	<b>17</b>	<b>23</b>

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
<b>Full time</b>						
Board directors	2	1	-	-	2	1
Executives	17	18	1	1	18	19
Technicians and administrative staff	74	57	20	18	94	75
Operators and specialists	162	182	1	6	163	188
<b>Total</b>	<b>255</b>	<b>258</b>	<b>22</b>	<b>25</b>	<b>277</b>	<b>283</b>

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
<b>Full time</b>						
From 19 to 29	16	22	1	-	17	22
From 30 to 39	39	34	2	2	41	36
From 40 to 49	93	103	11	11	104	114
From 50 to 59	90	85	7	9	97	94
Over 60	17	14	1	3	18	17
<b>Total</b>	<b>255</b>	<b>258</b>	<b>22</b>	<b>25</b>	<b>277</b>	<b>283</b>

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
<b>Part time</b>						
Board directors	-	-	-	-	-	-
Executives	-	1	-	-	-	1
Technicians and administrative staff	1	1	2	3	3	4
Operators and specialists	10	9	3	-	13	9
<b>Total</b>	<b>11</b>	<b>11</b>	<b>5</b>	<b>3</b>	<b>16</b>	<b>14</b>

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
<b>Part time</b>						
From 19 to 29	-	-	-	-	-	-
From 30 to 39	-	-	-	-	-	-
From 40 to 49	1	1	2	2	3	3
From 50 to 59	-	1	2	-	2	1
Over 60	10	9	1	1	11	10
<b>Total</b>	<b>11</b>	<b>11</b>	<b>5</b>	<b>3</b>	<b>16</b>	<b>14</b>

## Annual average employment contracts by gender, age and professional category

	Men	Women	Total
<b>Indefinite contracts</b>	<b>2021</b>	<b>2021</b>	<b>2021</b>
Board directors	1.99	-	1.99
Executives	17.20	1.00	18.19
Technicians and administrative staff	71.83	20.48	92.31
Operators and specialists	163.82	4.22	168.04
<b>Total</b>	<b>254.85</b>	<b>25.69</b>	<b>280.54</b>

	Men	Women	Total
<b>Indefinite contracts</b>	<b>2021</b>	<b>2021</b>	<b>2021</b>
From 19 to 29	11.03	-	11.03
From 30 to 39	34.16	1.12	35.28
From 40 to 49	91.46	12.96	104.42
From 50 to 59	90.62	8.98	99.59
Over 60	27.58	2.64	30.22
<b>Total</b>	<b>254.85</b>	<b>25.69</b>	<b>280.54</b>

	Men	Women	Total
<b>Temporary contracts</b>	<b>2021</b>	<b>2021</b>	<b>2021</b>
Technicians and administrative staff	4.99	1.99	6.98
Operators and specialists	9.97	-	9.97
<b>Total</b>	<b>14.96</b>	<b>1.99</b>	<b>16.95</b>

	Men	Women	Total
<b>Temporary contracts</b>	<b>2021</b>	<b>2021</b>	<b>2021</b>
From 19 to 29	5.98	1.00	6.98
From 30 to 39	5.98	1.00	6.98
From 40 to 49	2.99	-	2.99
<b>Total</b>	<b>14.96</b>	<b>1.99</b>	<b>16.95</b>

	Men	Women	Total
<b>Full time</b>	<b>2021</b>	<b>2021</b>	<b>2021</b>
Board directors	1.99	-	1.99
Executives	17.20	1.00	18.19
Technicians and administrative staff	75.82	20.07	95.89
Operators and specialists	163.82	1.23	165.05
<b>Total</b>	<b>258.84</b>	<b>22.29</b>	<b>281.13</b>

	Men	Women	Total
<b>Full time</b>	<b>2021</b>	<b>2021</b>	<b>2021</b>
From 19 to 29	17.01	1.00	18.01
From 30 to 39	40.15	2.12	42.26
From 40 to 49	93.45	10.97	104.42
From 50 to 59	90.62	6.98	97.60
Over 60	17.61	1.23	18.84
<b>Total</b>	<b>258.84</b>	<b>22.29</b>	<b>281.13</b>

	Men	Women	Total
<b>Part time</b>	<b>2021</b>	<b>2021</b>	<b>2021</b>
Technicians and administrative staff	1.00	2.41	3.40
Operators and specialists	9.97	2.99	12.96
<b>Total</b>	<b>10.97</b>	<b>5.40</b>	<b>16.37</b>

	Men	Women	Total
<b>Part time</b>	<b>2021</b>	<b>2021</b>	<b>2021</b>
From 40 to 49	1.00	1.99	2.99
From 50 to 59	-	1.99	1.99
Over 60	9.97	1.41	11.38
<b>Total</b>	<b>10.97</b>	<b>5.40</b>	<b>16.37</b>

### Industrial relations: percentage of employees covered by collective bargaining agreements

GRI: 102-41

The Iberpapel Group defends its employees' right of representation. This is reflected in the fact that 100% of the Group's workforce comes under the collective agreement applicable at each of the companies' work centres.

The current provincial collective agreement applicable in PGZ expires in 2021. This agreement was concluded in 2019 and a remarkable climate of social peace was achieved for 2019, 2020 and 2021. Negotiation of the next agreement will begin in 2022.

There are union representatives at PGZ to ensure balanced relations and the capacity to reach stable collective agreements covering the entire workforce.

In total, there are nine members representing the different trade union alternatives available in the area, three of whom are Risk Prevention delegates on the Occupational Health and Safety Committee. We also have three Trade Union Area Delegates, representing each of the trade unions present in the Company.

The Iberpapel Group's policy is to remain committed to ongoing dialogue with employees through transparent, participative processes, as reflected in the Company's industrial relations, which have always been conducted on reasonably good terms.

PGZ has an Equality Committee formed by six members (three men and three women), including a member of the Works Committee. This body promotes measures that favour effective equality between men and women in the Company, specifically in relation to selection, training and promotion.



### 4.3.3 SAFETY, HEALTH AND OCCUPATIONAL RISK PREVENTION

GRI: 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-8, 403-9, 403-10

Iberpapel considers that prevention and continuous improvement of aspects related to our employees' safety are among the main concerns both internally and externally for our stakeholders. Proof of this commitment can be found in our Occupational Risk Prevention Management System (SIGPRL) in place in the Industrial Division, which meets the specifications of the ISO 45001:2018 standard and is intended to help improve levels of health and safety for all workers.

Our SIGPRL has been certified externally by the independent expert DNV. The results of the latest system audit in 2021 were satisfactory.

The following actions were carried out:

- Activities of own prevention service, supplemented by a number of external prevention services.
- Regular assessments of occupational health and safety risk factors and preventive measures in place.
- Scheduled annual prevention activities.
- Implementation of an occupational risk prevention computer system (Prosafety).
- Coordination of business activities with our contractors.
- Observation and control of applicable prevention legislation by the employees themselves as they witness safe conduct.
- A periodic, highly ambitious inspection plan encompassing all the facilities.



#### EXTERNAL PREVENTION SERVICES

- **Preving:** coordinates business activities, given the significant presence of contractors in the Company's facilities, for the specialities ergonomics, psychosociology and occupational medicine.
- **CEI:** oversees the observance of prevention rules by the employees themselves, thereby reinforcing the oversight activities that are the Company's responsibility.
- **Preving and Quirón Prevención:** prevention services received by the Group's subsidiaries.

#### The importance of employee health and safety

We are fully conscious that people are our main asset and must work in conditions that are optimal from a health and safety viewpoint

**Resources devoted to our workers' health and safety (PGZ)**

Human resources devoted to this matter include our own prevention service. In addition to those responsible, this service encompasses all our executives, supervisors and middle managers, who act as prevention resources.

**HEALTH AND SAFETY COMMITTEE (PGZ)**

Total number of health and safety committees: 1

Covers over 80% of the Group's employees.

We also have a joint Health and Safety Committee formed by representatives of management and the workers that holds regular meetings to promote corrective and/or preventive safety-related initiatives, entailing a considerable investment by the Company (€200 thousand) and an important benefit for the workers.

The investment in internal and external human resources engaged in health and safety amounted to around €1,256 thousand in 2021.

Similarly, specific actions entailed investments of close to €120 thousand, including EPIS, Covid-19, improvement of firefighting facilities, collective and individual protection, barriers and machine protection.

An additional investment of approximately €80 thousand was incurred for risk prevention training.

Our industrial subsidiary PGZ has its own prevention service for the industrial safety and hygiene specialities, and uses two external prevention services for the specialities ergonomics, psychosociology and occupational medicine. The Group's other subsidiaries have contracted an external prevention service for all specialities.

Besides all these measures taken to protect our workers, all the collective agreements applicable to the Group address occupational health, safety and risk prevention, such as oversight of public health and medical examinations, both on a regular basis and following a prolonged absence.

**Cost of occupational risk prevention activities and resources 2021-2019**

Thousand euro	2021	2020	2019
In-house resources	827	821	744
External resources (Asepeyo, Preving, Unipresalud)	229	269	237
Specific risk prevention actions	120	267	185
Risk prevention training	80	100	170
<b>Total</b>	<b>1,256</b>	<b>1,457</b>	<b>1,336</b>

### Occupational medicine

The Iberpapel Group outsources these tasks through Preving's prevention service. In 2021, a total of 219 compulsory medical examinations were carried out at PGZ, 194 workers having been declared fit to work and some kind of restriction having been imposed in 25 cases.

As stipulated in the service, a part of the medical examinations are periodic and others are conducted before the worker joins Iberpapel or returns following a prolonged period of leave.

The occupational medicine service detected no cases of significant occupational disease and recognised no incapacity deriving from common illnesses or accidents during the year. There are also complementary services to which great importance is afforded. A medical service is available to PGZ's workers for minor care and consultation, as well as a first-aid service in the event of accidents, which is provided by Quirón Prevención.

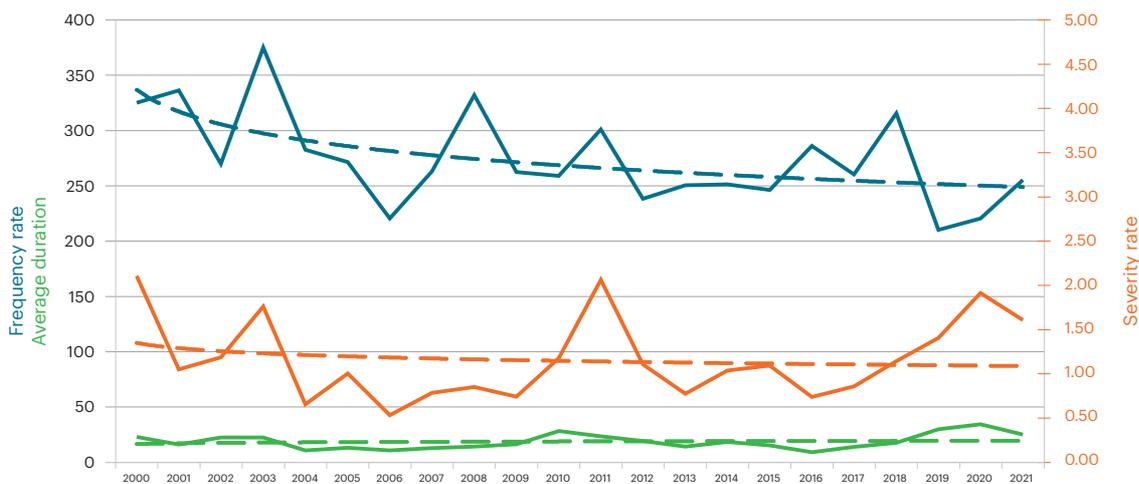
### Employee health and safety highlights

In 2021, the total number of accidents at PGZ rose 15% against the previous year. Both lost-time accidents and non-lost-time accidents increased by 15%. Days lost due to accidents fell by 20% on the previous year.

So the charts show an increase in frequency and a fall in average duration and severity.

All employee accident rate metrics refer only to PGZ, the industrial company employing most of Iberpapel's employees. There were no occupational accidents in the other Group companies in 2021.

Accident rate trend (2000-2021)



- Frequency rate: number of lost-time and non-lost-time accidents per million hours worked.
- Average duration: average hours lost per lost-time accident.
- Severity rate: days lost per 1,000 hours worked.

The main reasons for the accidents were impacts by objects or tools, poor work postures and stepping on objects.

#### Rate trends <sup>1</sup>

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
Frequency rate <sup>2</sup>	255	220	-	-	255	220
Average duration <sup>3</sup>	25	34	-	-	25	34
Severity rate <sup>4</sup>	1.61	1.91	-	-	1.61	1.91

<sup>1</sup> The rate trends may be observed in the chart.

<sup>2</sup> Number of lost-time and non-lost-time accidents per million hours worked.

<sup>3</sup> Average hours lost per lost-time accident.

<sup>4</sup> Lost days per thousand hours worked.

#### Hours of absenteeism by gender

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
Hours of absenteeism	38,106	37,440	2,899	3,245	41,005	40,685

#### 4.3.4 TALENT ATTRACTION AND RETENTION

GRI: 103-2, 103-3, 401-1, 401-2, 404-1, 404-2, 405-2

We develop and implement measures to motivate and reward our employees for their dedication and commitment. Retention actions are fully aligned with our values and principles, caring for our professionals from a personal perspective and developing their professional skills.

At present, the tools we use to achieve this purpose are employee training and career development, communication, work-life balance and the right to disconnect, fringe benefits and remuneration.

##### Professional training and development

Our constant concern for the high quality and qualifications of our human resources is reflected year after year in our significant efforts to select and train employees so as to identify the right people, aligned with the companies' culture and values, and drive their personal and professional development.

In 2021, over 170 training actions were completed at PGZ, entailing a total of 8,057 training hours, in line with 2020 but well below previous years. This was due to the restrictions on face-to-face meetings and courses under the Covid-19 Protocol.

The investment in training and development amounted to approximately €378 thousand in internal and external costs (-8% on 2020). This training effort translates into an average of 47 hours and €2,220 of training expenditure per employee, which is well above the industry average according to a comparative study carried out annually by the Basque Paper Industry Cluster Association.

We encourage closeness to our team to discover their career development concerns and adapt to their needs and expectations, an Annual Training Plan having been prepared for each division and included in our ISO 9001:2015 certification.

The goal in offering these programmes is to improve the quality and reduce the cost of our production process by keeping technical knowledge up to date and to enhance productivity by reinforcing employees' range of skills and autonomy. Attention was also focused on improving safety in the workplace through training.

Fully aware of our decisive influence on the working environment and given the high degree of automation at the plant and our heavy investment in technology, we carefully select the most qualified employees for each of our three divisions. The Company also has a variety of profiles, favouring diversity and competitiveness in the organisation.

In 2021, we trained our employees in the Corporate Social Responsibility matters most relevant to them. This included health and safety training, such as courses on occupational safety and first aid, or on the safe operation of facilities. In response to the interests expressed by employees through the appropriate channels, we arranged courses addressing other CSR areas such as the improvement of communication with customers and suppliers and quality enhancement.



## Training

	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
Board directors	1	-	-	-	1	-
Executives	4	-	1	-	5	-
Technicians and administrative staff	40	10	2	-	42	10
Operators and specialists	122	84	-	-	122	84
<b>Total</b>	<b>167</b>	<b>43</b>	<b>3</b>	<b>-</b>	<b>170</b>	<b>43</b>

### Communication with our employees

Two-way communication between the employees and the company is a key factor to assure a good work climate and obtain first-hand insight into their needs and concerns.

We have a number of communication channels open, such as regular meetings with the Works Committee, a smooth, transparent dialogue with union representatives and the Group's Whistleblower Hotline.

We also have two-way vertical communication channels between management and employees as part of the in-house Occupational Risk Prevention Management System.

### Organisation of work time, work-life balance and the right to disconnect

- **Organisation of work time**

The length of the working day, which can help to improve both quality of life and productivity, is stipulated in the applicable collective bargaining agreement.

Iberpapel believes in rational work time management and has measures in place to facilitate a work-life balance and the right to disconnect.

- **Work-life balance measures**

At Iberpapel, we seek to favour the balancing of our employees' personal, family and working lives. Measures are studied and implemented to make it easier to strike this balance without undermining the Group's productivity and needs.

In 2021, 254 actions were implemented (34.25% more than in 2020) totalling over 4,015 hours (+4.98% on 2020).

- **Right to disconnect**

Besides work-life balance measures, we make sure that employees do not exceed their assigned working hours. We therefore guarantee that workloads are in line with working hours. Iberpapel currently has no formal policy in this respect.



### WORK-LIFE BALANCE MEASURES

- Serious family illness: 38
- Death of family members: 15
- Moving house: 7
- Social security specialists: 63
- Accompaniment: 20
- General practitioner and private specialists: 40
- Maternity/paternity: 8
- Breast-feeding: 1
- Previn: 59
- Wedding: 3

### Fringe benefits for our employees

In addition to the actions indicated, the Iberpapel Group provides the employees with conditions and fringe benefits that may vary from company to company, as reflected in each collective agreement.

PGZ's workers, who make up most of the Group's workforce, receive:

- A medical service including a doctor and a qualified nurse on site in the plant, contracted with the company Quirón Prevención.
- A group life and accident insurance policy, the premium being paid 60% by the Company and 40% by the employee. If there are no claims, a large part of the premium is reimbursed as a share of profits.
- A retirement supplement paid to a voluntary contribution pension fund (GEROA) in monthly instalments by the Company, equivalent to 0.70% of the contribution base for general contingencies, as compared with 0.60% in the previous year. Our employees also contribute 0.70% of the contribution base monthly.

These benefits are available to all our employees, irrespective of the type of employment contract.

### Remuneration for personnel

As remuneration is one of the factors that most influence employee satisfaction, it is set with the aim of motivating our professionals and encouraging initiative so they become actively involved in problem solving and teamwork and, above all, show a positive, communicative attitude.

#### Average remuneration and trends by gender, age and professional category

Currency: Euro  
Country: Spain

Category	Men		Women	
	2021	2020	2021	2020
Executives	124,809	157,213	107,249	132,073
Technical specialists	64,337	56,385	41,614	52,834
Administrative personnel	44,799	41,994	42,230	40,828
Operational personnel	47,394	45,040	-	37,485

Currency: Euro  
Country: Spain

Age	Men		Women	
	2021	2020	2021	2020
From 18 to 29	41,949	37,108	33,735	38,452
From 30 to 39	47,279	39,672	33,735	37,044
From 40 to 49	56,465	55,254	46,375	50,190
From 50 to 59	63,535	67,157	46,042	45,197
Over 60	75,289	65,534	54,265	49,651

Currency: Argentine peso  
Country: Argentina

Category	Men		Women	
	2021	2020	2021	2020
Technical specialists	1,337,231	932,512	-	-
Administrative personnel	-	-	1,457,393	997,606
Operational personnel	-	-	683,261	417,934

Currency: Argentine peso  
Country: Argentina

Age	Men		Women	
	2021	2020	2021	2020
From 40 to 50	1,083,566	694,158	1,196,103	817,869
From 50 to 60	1,421,786	961,830	693,000	377,474

Currency: Uruguayan peso  
Country: Uruguay

Category	Men		Women	
	2021	2020	2021	2020
Technical specialists	1,405,650	1,341,894	-	-
Operational personnel (specialised)	648,363	532,756	579,122	476,400
Operational personnel (unspecialised)	513,456	458,633	-	-

Currency: Uruguayan peso  
Country: Uruguay

Age	Men		Women	
	2021	2020	2021	2020
From 20 to 30	598,391	464,612	-	-
From 30 to 40	644,134	543,656	579,122	476,400
From 40 to 50	1,063,166	1,004,120	-	-
From 50 to 60	684,801	580,490	-	-

#### Wage gap in equal positions <sup>(\*)</sup>

Currency: Euro  
Country: Spain

Category	2021
Executives	-14.07%
Technical specialists (**)	-35.32%
Administrative personnel	-5.73%
Operational personnel	-

Currency: Uruguayan peso  
Country: Uruguay

Category	2021
Operational personnel (specialised)	-10.68%
Operational personnel (unspecialised)	-

<sup>(\*)</sup> The wage gap has been calculated by taking the average wage of men less the average wage of women, divided by the average wage of men.

<sup>(\*\*)</sup> The wage gap between men and women for the technical professional category in 2021 is explained by the fact that, as can be seen in the workforce breakdown tables, the number of male technical specialists in our Group is much higher than the number of women in this category (there is no basis for gender discrimination in new hires) and that the seniority of the Group's male technical specialists exceeds that of the women in this category. Our personnel's remuneration evolves on the basis of length of service and performance evaluation over the years. Bearing in mind the recent hiring of female technical specialists, their salary is comparatively lower than that of their male counterparts, who have an average length of service of 14 years. So, if our female technical specialists remain in the workforce in the long term, the pay gap will shrink.

## HIGHLIGHTS OF TALENT ATTRACTION AND RETENTION

## Total number and rate of new employee hires. By age group and gender

Age	Men		Women	
	2021	2020	2021	2020
From 19 to 29	4	6	1	-
From 30 to 39	2	8	0	-
From 40 to 49	2	4	0	-
From 50 to 59	6	1	1	-
<b>Totals</b>	<b>14</b>	<b>19</b>	<b>2</b>	<b>-</b>
Total employees	266	269	27	28
Rate of new hires	5.26%	7.1%	7.41%	0.0%

## Total employee number and turnover. By age group and gender

Age	Men		Women	
	2021	2020	2021	2020
From 19 to 29	5	3	-	1
From 30 to 39	4	4	1	-
From 40 to 49	2	-	-	-
From 50 to 59	2	-	-	-
Over 60	3	-	2	-
<b>Totals</b>	<b>16</b>	<b>7</b>	<b>3</b>	<b>1</b>
Total employees	266	269	27	28
Rate of new hires	6.02%	2.6%	11.11%	3.6%

## Number of lay-offs

There were no lay-offs in 2021 or 2020.

### 4.3.5 COMMITMENT TO DIVERSITY, INCLUSION, INTEGRATION AND EQUAL OPPORTUNITIES

GRI: 103-2, 103-3

In all the geographies in which we operate and in the companies through which we do business, we seek to foster a fairer, more equal and inclusive society, so we promote equal opportunities and talent diversity in all phases of the labour relationship with employees, in relation to hiring, promotion, development and training, as well as working conditions.

The Group is totally opposed to any kind of discrimination by reason of race, gender, ideology, nationality, religion, sexual orientation or any other personal, physical, mental or social conditions of our employees, promising to eliminate any obstacle in the way of equal treatment and opportunities

#### Equality Plan (2020-2025)

In line with Organic Law 3/2007 of 22 March on the Effective Equality of Women and Men, as well as Iberpapel's commitment to equality under the applicable collective bargaining agreement. PGZ, the subsidiary that employs over 80% of the Group's workforce, has had a five-year Equality Plan in place (2020-2025), since the first quarter of 2020, which was agreed by the Equality Plan Negotiating Committee formed by workers and their legal representatives.

It contains the policies governing our daily activities in relation to equality and non-discrimination, the firm purpose being to promote real equality among women and men through specific actions in the areas of selection, training, professional promotion and working conditions.



#### **EQUALITY PLAN 2020-2025**

The goal of the five-year plan (2020-2025) is to promote measures that favour equality in selection, recruitment, training and promotion, among other aspects:

- Guarantee of equal treatment and opportunities for women and men.
- Application of the gender perspective in all areas of the organisation.
- Assurance of non-discrimination by reason of gender.
- Communication, awareness and corporate culture.

### Disability management

The Iberpapel Group's commitment to Corporate Social Responsibility includes favouring equal opportunities through a series of measures to integrate social groups that find it more difficult to access the job market, by reserving posts for disabled people in certain areas, mainly the warehouse or the laboratory.

We had nine disabled employees at year-end 2021.

Thanks to this commitment, we do not merely comply with applicable legislation (General Law on the Rights and Social Inclusion of Disabled Persons), but we are actively engaged in fostering their inclusion in the job market.

In this context, 3.07% of the Group's workforce are disabled persons, which is above the legal minimum.

#### Disabled employees by gender, professional category and age (no.)

Professional category	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
Executives	-	-	-	-	-	-
Technicians and administrative staff	1	-	1	1	2	1
Operators and specialists	7	8	-	1	7	9
<b>Total</b>	<b>8</b>	<b>8</b>	<b>1</b>	<b>2</b>	<b>9</b>	<b>10</b>

Age	Men		Women		Total	
	2021	2020	2021	2020	2021	2020
From 19 to 29	-	-	-	-	-	-
From 30 to 39	-	-	-	-	-	-
From 40 to 49	2	2	1	1	3	3
From 50 to 59	2	2	-	-	2	2
Over 60	4	4	-	1	4	5
<b>Total</b>	<b>8</b>	<b>8</b>	<b>1</b>	<b>2</b>	<b>9</b>	<b>10</b>

Year-end data (31/12/2021).

## 4.4 RESPONSIBILITY TO OUR CUSTOMERS

### 4.4.1 RESPONSIBILITY TO OUR CUSTOMERS AT A GLANCE

GRI: 103-2, 103-3, 417-1

#### 2021 MILESTONES

- Retention of customers in the long term, thanks to our ability to adapt to changing needs.
- Study and approval of improvements for the manufacture of products with greater added value.
- In August this year, Papelera Guipuzcoana de Zicuñaga received a licence to use the European Eco-label (EU Ecolabel) for several of our graphic papers.
- In 2021, specialty paper sales accounted for nearly 30% of the total, bringing us closer to the target set in the previous year.

#### FUTURE CHALLENGES

- Win more customers and increase the volume of sales.
- Consolidate, in future years, the 30% special papers sales reached in 2021.

#### MAIN METRICS AND TRENDS FOR 2021 > Our performance in 2021

<b>92%</b> = vs. 2020	<b>93%</b> = vs. 2020	<b>0.46%</b> -33% vs. 2020
Domestic customers for >5 years	International customers for >5 years	Ratio of claims to sales made

#### OUR MAIN CONTRIBUTION TO THE SDGs



#### GOAL 12.8

Ensure education for sustainable development

We offer our customers high-quality products that fulfil their requirements. This guarantees satisfaction, as shown by the fact that 92% and 93% of our domestic and international customers have been with us for more than 5 years. We have a Marketing and Sales Strategy that ensures our awareness of changing needs and direct dialogue with customers, allowing continuous improvement.

### 4.4.2 RESPONSIBILITY TO OUR CUSTOMERS

GRI: 416-1

Iberpapel is able to make high-quality, competitive and sustainable products which meet our customers' needs.

#### A) Customer satisfaction and trust

The mainstays of our success are the manufacture of high-quality products and a flexible production process. This has resulted in customer satisfaction and trust.

Our Quality Policy is focused on supplying products that meet customer expectations, a commitment to continuous improvement and an active, reliable role in the paper market. All our employees are aware of their place in our Quality Policy and cooperate actively to:

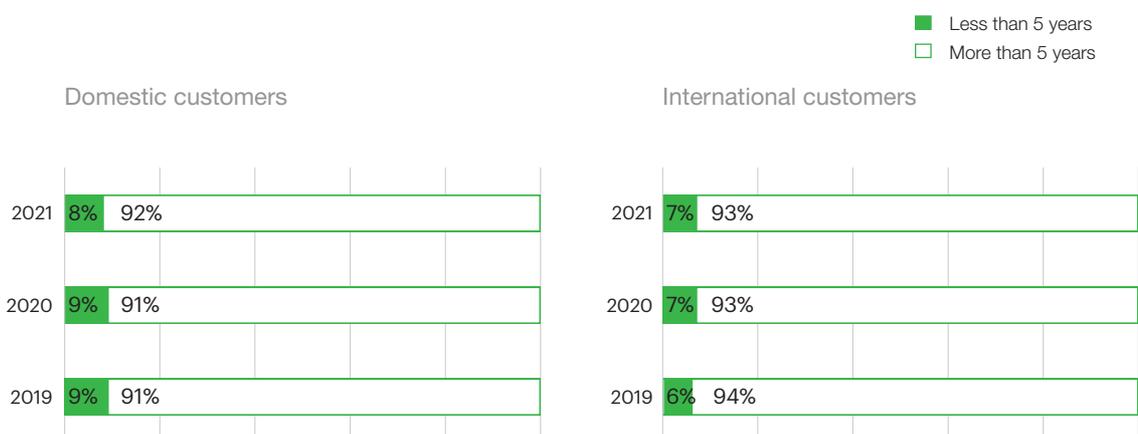


#### QUALITY POLICY

- Review, improve and optimise existing processes and controls so as to guarantee the quality and traceability of our products.
- Respond to claims through a procedure that assures examination, logging and response.
- Assure deliveries meet requirements.
- Build a smooth dialogue with customers to enhance the quality of existing products or develop new products that meet current or future needs.

Customer satisfaction and loyalty is high, as demonstrated by the fact that 92% of our domestic customers have worked with us for over five years, 93% at the international level.

#### Age of our customers



In a context in which buyers expect a lot from companies and have more choice than ever before, we have a very stable customer base which allows us to look to the future with confidence.

Iberpapel, in its commitment to business quality and excellence, renewed ISO 9001:2015 Quality Management System certification and ISO 14001:2015 Environmental Management System certification in 2020. Our efforts to implement the benchmark standards in areas such as quality and the environment are reflected in products that comply fully with environmental and other legislation while also meeting customers' needs. Both our customers and the international certification systems endorse our high-quality products and our customers place their trust in us as a present and future supplier.

### B) Marketing strategy

The Marketing and Sales Strategy reflects a philosophy of continuous improvement so as to expand and maintain our customer base by meeting their demands.

We respond to our customers' current and potential needs and expectations using key information, thanks to our Marketing and Sales Strategy. Pricing policies are continuously reviewed and products are planned and promoted in Spain and overseas.



#### MARKETING STRATEGY

- 1 Obtaining and holding of key information to be at the cutting edge in new product development.
- 2 Improving our current product portfolio with the aim of offering higher quality standards tailored to our customers' needs.
- 3 Producing to order, combining the required high quality with optimal production efficiency.
- 4 Continuously reviewing pricing policies to adapt to the market context.
- 5 Planning and promoting products in the domestic and international markets.

**2022**  
OBJECTIVE

CONSOLIDATED  
specialty paper sales at  
**30%**



### KEY COMPONENTS OF OUR SALES STRATEGY

In order to implement the Company's strategies, we have a sales team focused on market analysis, on personalised customer care and on permanent monitoring of our customers' satisfaction with products purchased and the service received. Our competitive advantage is thus attributable to these actions, which are actively coordinated.

Our permanent commercial goals include innovation, ongoing product development and improvement, and the constant pursuit of high quality standards and consolidation of our market position. This has led to the launch of new products that increasingly account for a higher percentage of sales: Zicubag in reels and formats (paper for bags with high mechanical resistance), Zicubag GR in reels and formats (greaseproof paper), Zicuflex reels and Zicuflex Baking (packaging paper), Vellum SC (label face) and Zicupharma in reels and formats (paper for leaflets), consolidating our position as a packaging segment supplier.

Our closeness to customers gives us first-hand knowledge of the market situation and we are among the leading companies in the search for new, higher-value-added, benchmark products.

The combination of all these factors has allowed us to achieve a good positioning in the industry and to successfully overcome complicated market scenarios.

### C) Customer channels and communication

GRI: 102-43, 417-1

The Group regularly conducts customer satisfaction surveys and has an ISO 9001 certified claims system to log possible incidents and prepare improvement plans based on the opinions of consumers.

In order to establish a constant, proactive dialogue in relation to complaints and claims, Iberpapel has developed an after-sale service to manage and record any incidents. Using this tool, we are able to classify customer complaints and suggestions in three areas (commercial, logistics and quality), which are in turn divided into different claim reasons. In this way, they can be parameterised and studied over time to implement corrective measures for each one and verify their effectiveness, such as damages in transit, delivery errors, commercial management discrepancies or the physical characteristics of paper and related machinability, or cutting or surface issues.

The relevant department studies each individual claim to arrive at a solution that is satisfactory to both parties, including the recovery and replacement of the products. Any improvement opportunities are identified, as well as the aspects with which the customer is currently most satisfied, so as to make plans for the future.

A total of 314 claims were received through the relevant channels in 2021, reflecting 0.46% of sales (2020: 0.69%), which is 33% less than the previous year.

Finally, Iberpapel's customers are invited to visit the Group's facilities, mainly the paper company, to obtain first-hand knowledge of the Company's processes and methodology.

Similarly, our sales representatives visit the main customers to obtain consumer opinions and detect possible new ways of collaborating to generate new business opportunities.

#### D) Responding to our customers' needs

The Iberpapel Group communicates smoothly and continuously with customers so as to learn about and respond to their needs. In order to protect our leading position in the industry and provide a quality service, we work actively to identify and adopt early any new market trends, innovations and developments that can be offered to our customers.

Our production process is very flexible because all the phases are integrated. This allows paper of different qualities to be produced and market niches for smaller paper machines to be accessed.

In view of the new market trends, in recent years we have engaged in intense research and development work to enhance processes, launch new products and monitor new technologies so as to ensure the maximum possible customer satisfaction by both responding to aesthetic and mechanical requirements for all paper uses and meeting the highest environmental standards.

This know-how and the major investments made will enable the Group to compete successfully in the promising flexible packaging paper market, in which the Group already markets various product qualities.

#### E) Customer safety

GRI: 416-1

Iberpapel offers its customers the best service and has the necessary systems and processes to meet growing demands from society in general and customers in particular as regards product safety and quality, fulfilment of legal obligations and assurance of the maximum protection for consumers.

As mentioned earlier in this section, the Iberpapel Group's Quality Policy gives top priority to customer satisfaction and continuous improvement, ensuring that products and services meet quality standards.

Besides ISO 9001 quality certification, the Group has ISEGA certification, guaranteeing that our paper meets the German BfR XXXVI standard on paper or board products that come into contact with food. The Group also obtained the EU Ecolabel for several of our products this year.

As regards the security and privacy of our customers' personal data, the Iberpapel Group assures that they are always protected and are not used inappropriately.

The Group has a Privacy Management Policy in place in all our companies to make sure that we process data in a lawful, faithful and transparent way.

Our website, [www.iberpapel.es](http://www.iberpapel.es), includes further information on the Group's Privacy Policy setting out the guidelines that must be observed whenever personal data are processed, in compliance with Regulation (EU) 2016/679 of the European Parliament and Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights.

To contact an Iberpapel Group company in relation to this matter and/or to exercise, where appropriate, the rights of access, rectification, erasure, objection, restriction of processing, data portability and not to be subject to automated decisions, you may do so through the Group's Data Protection Office at the e-mail address [protecciondatos@iberpapel.es](mailto:protecciondatos@iberpapel.es). You may also file a complaint with the Spanish Data Protection Agency should you consider that the Iberpapel Group has infringed your rights under applicable data protection legislation.

## 4.5 RESPONSIBILITY TO OUR SUPPLIERS

GRI: 102-9, 103-2, 103-3, 204-1, 308-1

### 4.5.1 RESPONSIBILITY TO OUR SUPPLIERS AT A GLANCE

#### 2021 MILESTONES

- Development of sustainable management procedures.
- Good performance of the two chains of custody that guarantee the sustainable sources of our forest raw materials.
- Prioritisation of local procurement.

#### FUTURE CHALLENGES

- Maintain a high percentage of custody chain certified timber suppliers.
- Carry on buying raw materials from domestic supplier.
- Continue extending our commitment to sustainability throughout our value chain.
- Incentivise loyalty and regularity in strategic suppliers while promoting lasting relationships.
- Prepare a Responsible Procurement Policy.

#### MAIN METRICS AND TRENDS FOR 2021 > Our performance in 2021

<b>57%</b> -9.52% vs. 2020	<b>90% in 2021</b> -10 vs. 2020	<b>91.84%</b> -3.34% vs. 2020
Certified timber	% of custody chain certified timber suppliers	Raw material sourced nationally

#### OUR MAIN CONTRIBUTION TO THE SDGs



#### GOAL 12.2 | GOAL 12.6

Efficient use of natural resources  
Adoption of sustainable practices in companies

Our commitment to sustainability in value chain management is a key to assuring a responsible supply and production model. To achieve this, we have designed management procedures that are not only efficient but also sustainable, allowing us to undertake the procurement process rationally and confirm that our principles of integrity, transparency and respect for our environment are applied throughout the chain of custody for forest-sourced timber and products, comprising 29 suppliers.

#### 4.5.2 RESPONSIBILITY TO OUR SUPPLIERS

One of the essential aspects of our business is to assure supplies of basic raw materials, such as timber, cellulose pulp and energy. In our case, the Hernani plant integrates the production of cellulose pulp, paper, power and thermal energy, thanks to the new cogeneration plants, providing a clear advantage in the production process.

##### A) Management approach to sustainable procurement

The supply of timber and pulp involves selecting qualified suppliers that are committed to the environment. We have two chains of custody for forestry products, integrated with our Environmental Management System, which is audited externally and independently by Det Norske Veritas (DNV) under ISO 14001:2015.

The first chain of custody has been operational since 2005, was prepared in line with the PEFC standard and is audited externally and independently by AENOR. The second came into use in 2009 under the FSC® standard and is audited externally and independently by SGS. The purpose of both chains is to put in place a system certified by a third party to guarantee traceability between certified raw materials and certified final products (paper). Through their responsible purchases of certified paper, our customers thus promote sustainable forest management.

PEFC and FSC® certified forestry products (timber, paper, cork, mushrooms, resins, essences...) provide consumers with a guarantee that they are buying products from sustainably managed forests. So shoppers can help to combat illegal felling and promote the primary functions performed by forestry resources, such as helping to conserve numerous ecosystems and biological diversity, supporting the economy of many rural populations and the source of a huge transformation industry, and playing a social and cultural role that is increasingly appreciated.



This procedure is applicable to all phases of the forestry product process, from purchase to receipt and transformation of timber and pulp, and the selling of paper; it therefore affects our purchasing centre and our Commercial Department.

Additionally, we make every endeavour to ensure that supplies of raw materials obtained from forests do not deteriorate the environment. With this objective, a part of our global strategy is based on sustainable development through management systems adopted by several Group companies:

COMPANIES	ISO 14001:2015	PEFC	FSC® Multi-site	FSC®
Papelera Guipuzcoana de Zicuñaga, S.A.U	●	●	●	
Copaimex, S.A.U			●	
Zicupap, S.A.U.			●	
Distribuidora Papelera, S.A.U.			●	
Moliner, Domínguez y Cía, S.A.U.			●	
Central de Suministros de Artes Gráficas Papel, S.A.U.			●	
Iberbarna Papel, S.A.U.			●	
Iberpapel On Line, S.L.U.			●	
Ibereucaliptos, S.A.U.			●	●
Los Eucaliptus, S.A.				●
5 Argentinian companies		●		



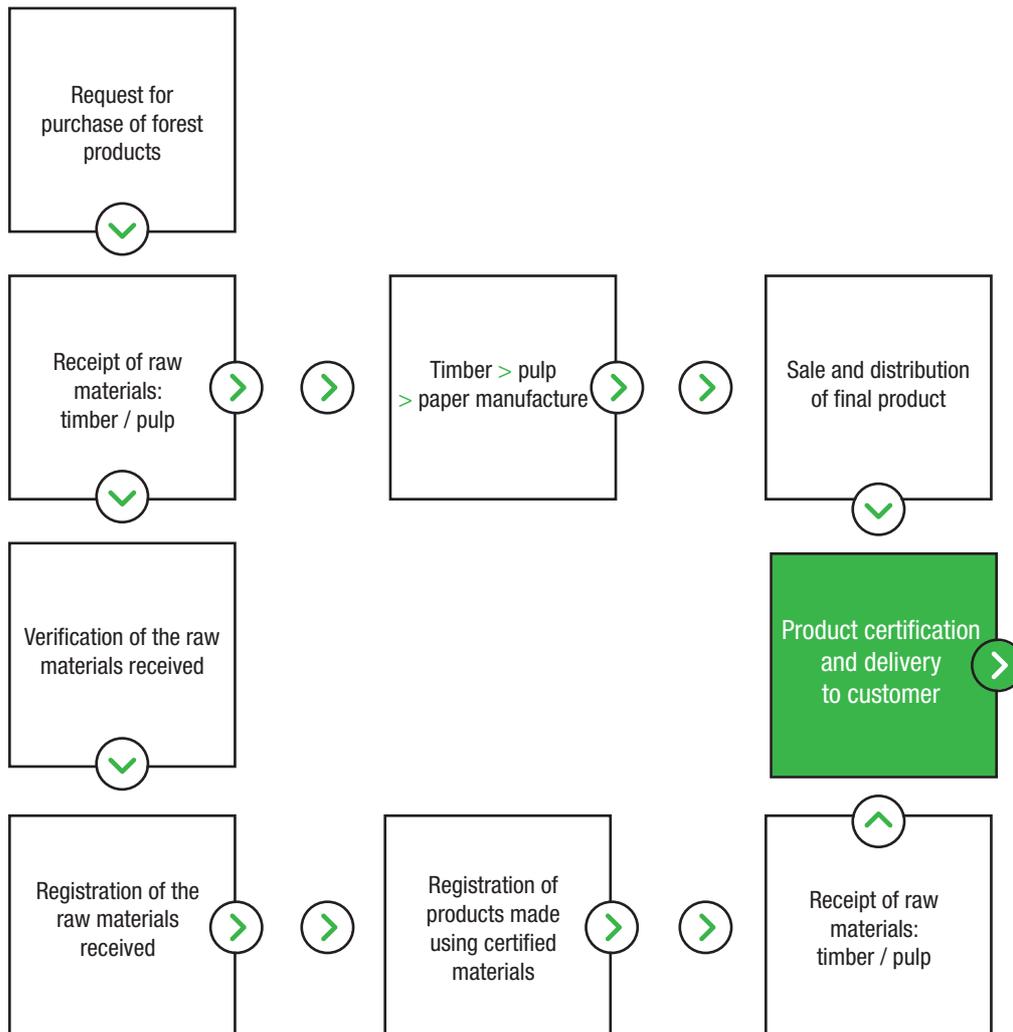
### B) Chain of custody system performance

In recent years, the input rate for certified forest materials in PGZ's production system has been above the benchmark rate for Spain's paper industry, setting us apart from our competitors in terms of the high quantity of certified products.

In 2021, we reached 57% certified timber with respect to total inputs. In turn, custody chain certification affords us a number of advantages that put us at the cutting edge of the market:

- Improves our market image through the promotion of sustainable forestry management.
- Guarantees that the products purchased are from sustainably managed forests, inspiring trust in customers and users.
- Enables the improvement of forestry product transformation management.
- Integrates chain of custody management with the environmental management system.
- Facilitates entry into markets that are highly sensitive to environmental issues.

#### MAIN PHASES OF THE CHAIN OF CUSTODY



### C) Summary of the raw material supplier assessment and control process

GRI: 103-2, 103-3, 308-1, 414-1

We include environmental aspects in our supplier relationships, buying from suppliers that have been assessed and are considered suitable. We therefore work with a list of authorised suppliers whose reliability and performance are periodically monitored.

Sustainability is integrated with our strategy, involving the entire value chain including suppliers, who share our environmental policy. As evidence of the Company's commitment, 99% of the timber used by the Iberpapel Group was bought from custody chain certified suppliers in 2021. The timber delivered is controlled by means of the EUTR (European Union Timber Regulation) Due Diligence System and two custody chain systems.

Each supplier undergoes continuous evaluation, focusing on two aspects:

- **Service:** the supplier must observe the Iberpapel Group's delivery deadlines for each order. Non-compliance could cause the supplier to be classed as unsuitable, ending its collaboration with the Company.
- **Quality:** the product must also fulfil acceptance limits for stipulated quality standards. Non-compliance may lead to the supplier being classed as unsuitable. Orders must also be accompanied by a quality certificate from the supplier.

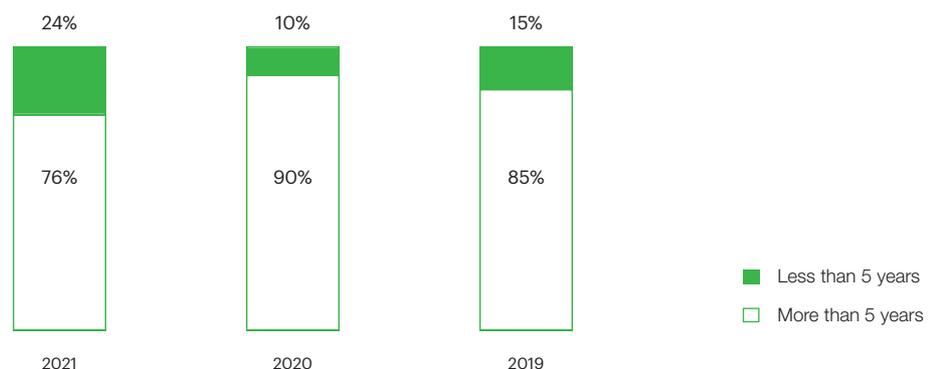
On the basis of the assessment results, three levels are established:

- Recommended supplier.
- Approved supplier, needs to improve.
- Unsuitable supplier, to be struck off.

New suppliers are asked to demonstrate certified company status under ISO 9001:2015 and/or undergo an evaluation process, meaning that they are tested on the basis of the supplies made until they are deemed to be suitable by the Purchasing Department.

The Iberpapel Group has stable, lasting commercial relationships with its suppliers.

#### Age of timber raw material suppliers

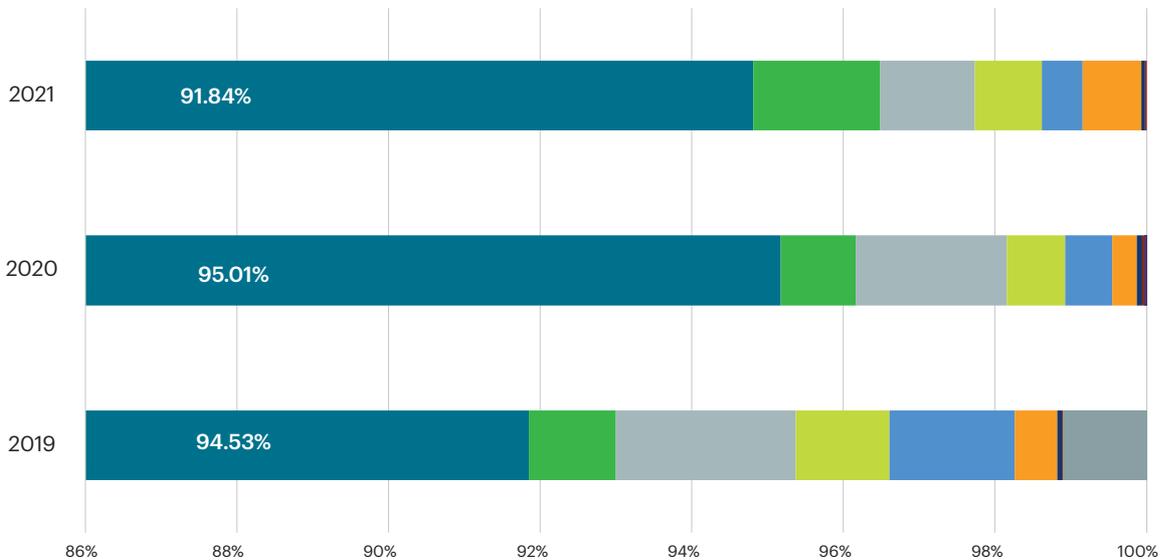


### D) Source of our raw material and local suppliers

In 2021, over 91.8% of the Iberpapel Group's raw material was sourced in Spain.

Iberpapel prioritises domestic suppliers, provided that they make a competitive offer and meet required quality standards, valuing aspects such as a quality system or certified products, among others. In this way, we have a very positive impact on the communities in which we operate, generating stable, quality employment. 91.84% of our raw materials are sourced in Spain. Supplies are also sourced in European countries, primarily Germany (2.37%), Netherlands (1.65%) and Sweden (1.24%).

#### Source of raw materials



Country	2021	2020	2019
<b>Spain</b>	91.84%	95.01%	94.53%
<b>Portugal</b>	1.15%	0.99%	1.67%
<b>Germany</b>	2.37%	1.99%	1.24%
<b>Sweden</b>	1.24%	0.77%	0.88%
<b>Netherlands</b>	1.65%	0.62%	0.54%

Country	2021	2020	2019
<b>France</b>	0.56%	0.32%	0.77%
<b>Italy</b>	0.06%	0.07%	0.05%
<b>United Kingdom</b>	0.02%	0.03%	0.02%
<b>Denmark</b>	1.10%		
<b>Other</b>		0.03%	

### E) Main impacts on the community through our supply chain

The following table summarises the following metrics reflecting community impacts through our value chain:

#### Main impacts on the community through our supply chain

	2021	2020
Total paid to suppliers (thousand €)	194,726	153,380
% to domestic suppliers	91,84%	95,01%
Average supplier payment period (days)	33,22	25,81



## 4.6 RESPONSIBILITY TO OUR LOCAL COMMUNITY

GRI: 103-2, 103-3, 203-2

### 4.6.1 RESPONSIBILITY TO OUR LOCAL COMMUNITY AT A GLANCE

#### 2021 MILESTONES

- Participation in 2 sponsorships.
- Donation of material to key community institutions.

#### FUTURE CHALLENGES

- Continue and encourage new collaboration initiatives with local communities in Argentina and Uruguay.
- Keep fostering local job creation and positive economic impacts while favouring domestic suppliers.
- Carry on sponsoring local community projects.

#### MAIN METRICS AND TRENDS FOR 2021 > Our performance in 2021

<b>91.84%</b> -3.34% vs. 2020	<b>2</b> -50% vs. 2020	<b>12</b> = vs. 2020
Domestic suppliers	Community sponsorships	Involvement in forums and associations

#### OUR MAIN CONTRIBUTION TO THE SDGs



#### GOAL 12.2 | GOAL 12.6

- Efficient use of natural resources
- Adoption of sustainable practices in companies

We have a social action plan for Argentina and Uruguay. We organise courses, talks and other initiatives in schools in our local communities to stimulate rural development. We also support schools by providing learning material and firewood for heating and cooking.

We contribute to local development and the economy through stable, quality direct jobs. We are a socioeconomic driver for the areas near to our assets thanks to indirect and induced employment in secondary activities. We prioritise domestic suppliers of raw materials and products, provided they submit a competitive offer and meet our quality standards.

We participate actively in different forums and associations, working together to boost development in society through excellence in our industry. We sponsor community sports clubs and cultural initiatives.

#### 4.6.2 OUR RELATIONSHIP WITH LOCAL COMMUNITIES

The Group has made a firm commitment to our local areas, bringing Corporate Social Responsibility beyond the business activity itself.

In the Group's local areas, we assure a trusting relationship with communities to maximise the positive impacts on society while mitigating negative effects and identifying new development opportunities.

The Iberpapel Group's activities usually have economic and other impacts that are favourable for the local areas.

We interact with key local agents so as to offer and obtain relevant information, meet their needs and respond to any complaints, creating two-way relationships based on mutual trust. We conduct personal interviews and talks in the rural areas of Argentina and Uruguay to inform people about Iberpapel's work in their communities and to discover their concerns.

#### 4.6.3 SOCIOECONOMIC CONTRIBUTION TO LOCAL DEVELOPMENT

GRI: 203-2

Our presence in the area is generally an opportunity for economic growth, the generation of stable, quality jobs and local development in the communities.

- **Job creation in the local community:** Iberpapel provides direct employment, frequently hiring people from local communities.
- **Economic impacts Besides direct jobs,** we generate indirect work linked to the creation of secondary activities.

We make direct contributions to the local economy by purchasing most of our raw materials and other products from national suppliers, which is one of the main local economic impacts.

Further information on our relationship with suppliers can be consulted in Chapter 4.5 Responsibility to our suppliers.



#### 4.6.4 SOCIAL ACTION INITIATIVES

GRI: 103-2, 103-3, 413-1

To achieve the harmonious insertion of Company into local communities, ensuring that they adapt to and benefit from the changes brought by our forestry activities, while at the same time becoming allies in risk prevention and forest care. This whole process is referred to as social management, which includes all the actions carried out by the Company in the framework of its relationship with the local society. It may possibly encompass local or national initiatives.

Social management activities are planned on the basis of knowledge of the sociocultural reality in the Company's areas of influence following research, field evaluations (surveys and monitoring) and direct contact with members of the local communities.

The Company's social management activities include coordinating with other forestry companies so as to optimise resources and enhance the perception of the industry as a whole.

We organise conferences in local communities on first aid, food and nutrition.

There are other impacts on local populations and the territory, besides employment and local development. We promote and develop projects and initiatives that improve local conditions to encourage the development of the rural zones, which is an increasingly complex issue due to the rapid growth of cities.

In this process, schools have been designated as priority institutions for the measures to be implemented, consisting basically of courses, talks, guided visits and support in the form of school materials and firewood for heating and cooking.

At the beginning of 2012, Iberpapel launched a social monitoring programme to examine the status of local communities in the areas of influence of our Argentinian y Uruguayan properties. Monitoring is performed to identify the positive and negative impacts of an activity on the social environment and is carried out by establishing direct and sustained links between business representatives and members of local communities. With the help of professionals and through face-to-face interviews and talks, the Company's work is publicised and information on the community's concerns is gathered.

This allows us to define and implement new measures aimed at boosting development, always from an educational viewpoint, and improving our local community activities. We organise training initiatives such as talks on the silvopastoral systems used to adapt our production system to local conditions, conferences on first aid and how to cope with snake bites, action guidelines in the event of forest fires and courses on food and nutrition.

- **Other contributions to the local community:** We help by donating material and equipment to local institutions, specifically in Argentina and Uruguay.

We have worked with institutions such as the fire brigade and the police (mainly contributing fuel and firefighting equipment); a range of schools, from elementary to technical, providing equipment (shelves, posts for games and printers); fuel (firewood) or our labour for transport or wood cutting.



We help by donating material and equipment to local institutions in Argentina and Uruguay.

DATE	INSTITUTION	CONTRIBUTION	AMOUNT *
09/01/2020	Basural Liebig	Backhoe clean-up	\$ 14.400,00
22/01/2020	Basural Liebig	Wooden posts	\$ 6.000,00
22/01/2020	Leibig police	Fuel	\$ 3.400,00
11/02/2020	Club Pescadores Fabrica Colón	Firewood	\$ 2.000,00
22/05/2020	Hospital San Benjamin	Safety kit	\$ 7.000,00
22/05/2020	Centro de salud Dr. Augusto Gaillard	Safety kit	\$ 7.000,00
22/05/2020	Hospital San José	Safety kit	\$ 7.000,00
22/05/2020	Centro de salud La Delfina	Safety kit	\$ 7.000,00
30/07/2020	Basural Liebig	Construction of perimeter fence	\$ 30.000,00
06/08/2020	Comisaria de Colonia Elia	Wooden posts	\$ 6.000,00
19/08/2020	Hospital San José	Safety kit	\$ 3.000,00
01/12/2020	Leibig police	Fuel	\$ 3.800,00
27/03/2021	Leibig police	Fuel	\$ 3.800,00
27/04/2021	Leibig police	Fuel	\$ 5.200,00
27/05/2021	Leibig police	Fuel	\$ 5.500,00
24/06/2021	Leibig police	Fuel	\$ 6.400,00
26/04/2021	Leibig police	Fuel	\$ 6.400,00
27/06/2021	Colonia Elia Police Department	Fuel	\$ 5.100,00
20/07/2021	Leibig police	Fuel	\$ 6.600,00
19/08/2021	Leibig police	Fuel	\$ 6.000,00
24/08/2021	Colonia Elia Police Department	Fuel	\$ 7.200,00
04/09/2021	Club Pescadores Fabrica Colón	Wooden posts	\$ 15.000,00
06/09/2021	Colonia Elia Fire Brigade	Funds to repair pump	\$ 30.000,00
06/09/2021	Colonia Elia Fire Brigade	Repair in tyre store	\$ 2.000,00
21/09/2021	Leibig police	Fuel	\$ 6.800,00
02/10/2021	Naval Prefecture in Argentina (Colón)	30 wooden posts	\$ 36.000,00
27/10/2021	Leibig police	Fuel	\$ 5.700,00
28/10/2021	Colonia Elia Police Department	Fuel	\$ 7.500,00
24/11/2021	Leibig police	Fuel	\$ 5.400,00

\*AMOUNT: Argentine pesos

DATE	INSTITUTION	CONTRIBUTION	INSTITUTION	AMOUNT*
01/04/2020	National Covid-19 fund	Fund to assist families in financial need	Economic contribution	\$ 475.650,00
01/07/2020	School no. 39 – Capilla de Cella	Posts for greenhouse	25 posts	\$ 12.600,00
01/07/2020	School no. 125 - Soca	Firewood for cooker	500 kg	\$ 4.260,00
01/05/2021	Rural school no. 26 – Maldonado	Firewood for cooker	500 kg	\$ 4.260,00
01/06/2021	Rural School no. 19 – Arequita	Firewood for cooker	500 kg	\$ 4.260,00
01/07/2021	Rural School no. 126 – La carreta	Firewood for cooker	500 kg	\$ 4.260,00
01/08/2021	Rural School no. 19 – Arequita	Firewood for cooker	500 kg	\$ 4.260,00

\*AMOUNT: Uruguayan pesos

### Guided tours

In both Argentina and Uruguay, visits are made to educational institutions to raise awareness of forestry activities. In Argentina, 5th and 6th year students from the Colón Agrotechnical School visited us in October 2021. In Uruguay, a visit was received in October 2021 from students from the 5th year of the agronomy engineering course at the National Agronomy Faculty. In November 2021, we were visited by students from the Forestry Supervisor Course held by the INNOVA training company.

During the pandemic, between 2020 and 2021, the Company organised several virtual forestry seminars with different universities. Two seminars were held in June 2021 with the UCU (Universidad de Concepción del Uruguay) and UNER (Universidad Nacional de Entre Ríos), and in October 2021 with the UNER and UL (Universidad de Lujan). We also took part in a national seminar organised by AFOA on Forest Certification in September 2021.

### Sports activities

A rural trail event was held on a route running across the Sophie Point property in Uruguay to reach the Cerro Betete High Conservation Value Forest.



Rural trail in the Sophie Point property in Uruguay



Guided visits are made to educational institutions to raise awareness of forestry activities.

#### 4.6.5 COMMUNITY SPONSORSHIPS

Papelera Guipuzcoana de Zicuñaga, S.A.U. sponsors a number of sports clubs and various associations. We also get involved in other programmes to promote social cohesion in our local communities, such as the sponsorship of local festivals.

##### Sponsorships in 2021

- C.D. Hernani de Pelota. III Zicuñaga Trophy **€3,000**
- Galarreta pelota court (Remonte) **€10,000**

##### Sponsorships in 2020 and 2019

- C.D. Hernani Escuela Pelota (Zicuñaga tournament)
- Hernani local festival
- "Txatxangorri Elkarte" hunting and fishing association
- Galarreta pelota court improvement



#### 4.6.6 INVOLVEMENT IN FORUMS AND ASSOCIATIONS

GRI: 102-12, 102-13

We play an active role in various national and international forums and associations to publicise the Group and forge partnerships with other relevant industry or national agents so as to join forces to achieve common objectives in the future through close cooperation.

In particular, we take part in:

- CEPI (Confederation of European Paper Industries), a non-profit organisation comprising four standing committees responsible for long-term strategies on matters affecting the industry. [[www.cepi.org](http://www.cepi.org)]

These committees address the environment, safety, climate change, energy and forests.

- ASPAPEL (Spanish association of pulp, paper and board manufacturers), a national body that groups together Spain's cellulose and paper companies. [[www.aspapel.es](http://www.aspapel.es)]
- Basque Paper Industry Cluster Association, a non-profit organisation focused on generating competitive advantages for companies in the Basque regional paper industry value chain. [[www.clusterpapel.com](http://www.clusterpapel.com)]
- EURO-GRAPH (European Association of Graphic Paper Producers), which represents the industrial sectors producing paper for newspapers, magazines and fine paper in Europe. [[www.euro-graph.org](http://www.euro-graph.org)]
- BASKEGUR (Basque timber association), a professional organisation representing and Basque forestry and timber sector as a voluntary meeting and consultation body for our industry and associated sectors. [[www.baskegur.eus](http://www.baskegur.eus)]
- Bolsa de Papel, a platform for manufacturers of paper bags, paper for bags, paper handles for bags, inks and paper bag machines which promotes sustainable consumption, conducts market research, disseminates information on environmental benefits, supports trade through constant innovation and responds to consumer demands. [[www.labolsadepapel.com](http://www.labolsadepapel.com)]
- "Thank you paper" campaign, an initiative launched by the Paper Forum to share current, verified information on paper with the general public. [<https://www.graciaspapel.es>]
- Buenarbol, a forestry information project developed by the Edufores foundation to publicise the social, economic and environmental uses of the eucalyptus tree in Spain. The project also highlights its importance in the bioeconomy and circular economy, through the essential use of natural resources and sustainable growth. [[www.buenarbol.com](http://www.buenarbol.com)]

We are also regular participants in environmental forums, such as:

- Environmental Committee of ASPAPEL (Spanish association of pulp, paper and board manufacturers).
- ASPAPEL's Forestry Committee
- Environmental Committee of the Basque Paper Industry Cluster Association.
- Water Planning Committee.
- Citizen Participation in the Water Board of the Eastern Cantabrian Water Zone.

### Argentina

- **COFRU (Uruguay river forestry consortium):** a consortium of forestry companies and producers whose main objective is to share experiences, information and knowledge to improve forestry technology and management.
- **AFOA (Argentinian forestry association):** a national entity representing the forestry sector in Argentina, which is made up of companies, forestry producers, students and independent professionals linked to the forestry industry and associated sectors and services.
- **CEC (Spanish Chamber of Commerce):** a public law corporation whose purpose is to represent, promote and defend the general interests of Spanish companies in Argentina.
- **ACE (association of business partners):** a group of companies and forestry producers whose purposes is to minimise the incidence of rural fires by working on prevention and early detection.

### Uruguay

- **SPF (society of forestry producers):** a civil association that represents the various players in Uruguay's forestry chain so as to promote sustainable development in economic, social and environmental terms.
- **PAIF (forest fire protection association):** forestry companies working together to administer and manage fire prevention and firefighting resources.

### Huelva

- **APOM (local association of rural highland producers):** for rural highland owners and forestry certification.

**5**

**OUR  
ENVIRONMENTAL  
RESPONSIBILITY**



## 5.1 OUR ENVIRONMENTAL RESPONSIBILITY AT A GLANCE

GRI: 103-2, 103-3

### 2021 MILESTONES

- New BATs (Best Available Techniques) in the pulp mill.
- Participation in voluntary carbon markets by issuing the first VCUs from our CO<sub>2</sub> capture project.
- Improvement of the collection and treatment of odorous gases.

### FUTURE CHALLENGES

- Assess our carbon footprint as a means to coordinate a decarbonisation policy in the Company.
- Establishing a Company decarbonisation policy.
- Promote energy efficiency as a means of reducing the effects of global warming.
- Encourage the reuse of waste internally or in other companies so as to promote the circular economy.
- Reduce our environmental impact by improving environmental parameters.

### MAIN METRICS AND TRENDS FOR 2021 > Our performance in 2021

<b>165,802 t CO<sub>2</sub></b> +2.38% vs. 2020	<b>0.583 MWh/t</b> -5.97% vs. 2020	<b>657,311 t CO<sub>2</sub></b> = vs. 2020	<b>71%</b> +7.58% vs. 2020
CO <sub>2</sub> emissions avoided	Power consumption	VCUs	Waste reused

### OUR MAIN CONTRIBUTION TO THE SDGs



#### GOAL 7.2

Increase renewable energy

Iberpapel reduces its environmental impacts through a commitment to clean energies and technologies, such as gas and biomass cogeneration plants. Besides promoting clean energy, energy efficiency is another key aspect of our operations.

>> OUR MAIN CONTRIBUTION TO THE SDGs

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**GOAL 12.2 | GOAL 12.4 | GOAL 12.5**

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- Efficient use of natural resources
- Management of waste and chemicals
- Waste prevention, reduction, recycling and reuse

We prioritise waste reuse and energy recovery before final disposal, applying circular economy principles to try to close our production circle and reduce raw materials and other products consumed. We adopt responsible consumption practices so as to ensure that timber supplies, in particular, and pulp supplies, to a lesser extent, are obtained from suppliers that are qualified and, above all, committed to the environment.



**GOAL 13.1**

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- Strengthen resilience and adaptive capacity

Our commitment to combating climate change is formally reflected in the Climate Change Policy, which contains related pledges and lines of action, prioritising three strategic aspects: energy efficiency, use of biomass to obtain energy and CO2 removal by our forest sinks.



**GOAL 15.2 | 15.4 | 15.5**

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- Sustainable forest management
- Assure the conservation of ecosystems
- Measures to reverse land degradation and halt biodiversity loss

We believe in using forest resources, a key component of our business, sustainably and responsibly so as to guarantee viability for future generations. Our actions include the promotion of silvopastoral systems that help to preserve the local area and generate considerable social and environmental benefits, as well as promoting projects in voluntary carbon markets. We monitor biodiversity in our properties, which has allowed the identification and declaration of high conservation value areas.



## 5.2 ENVIRONMENTAL RESPONSIBILITY

### 5.2.1 GLOBAL ENVIRONMENTAL CONTEXT

Growing global concern about the environment and climate change is giving rise to stricter environmental policies and more stringent targets to achieve increasingly ambitious goals. The European Commission's 8th Environment Action Programme stresses the need for economic growth not only to have a neutral impact on the environment but also to give back to the planet more than it takes:



A regenerative growth model recognises that the well-being and prosperity of our societies depend on a stable climate, a healthy environment and thriving ecosystems that provide a secure context for our economies. As the world's population and demand for natural resources keep growing, economic activity must develop in ways that do not harm but rather reverse climate change and environmental degradation, minimise pollution and lead to the conservation and enrichment of natural capital, thus ensuring the abundance of renewable and non-renewable resources. Through continuous innovation, adaptation to new challenges and co-creation, the regenerative economy strengthens resilience and protects the well-being of present and future generations.

One of the main goals is to significantly reduce emissions by 2030 and then to achieve net zero emissions by 2050. Environmental commitments from countries are being demanded to meet this goal.

#### What happened at the latest UN Climate Change Conference?

The UN Climate Change Conference (COP26) is an international meeting point and an annual checkpoint for the monitoring and review of the global environmental transition, addressing the issue from three basic perspectives: mitigation, adaptation and financing. The agreement, though not legally binding, sets the global climate change agenda for the next decade. It aims to boost international cooperation in sectors with high greenhouse gas emissions and keep them on international policy agendas over the next decade. COP26 was scheduled for November 2020 but was held on 31 October 2021 in Glasgow.

With regard to emissions, an agreement was reached by the countries to cut emissions of CO<sub>2</sub>, one of the main greenhouse gases and so a cause of climate change. Pre-COP26 environmental goals set a global warming limit of around 2.4°C. However, at COP26 it was agreed that this target was not sufficient to combat the consequences of climate change and a new target was set limiting the global temperature increase to 1.5°C. A specific plan was established to reduce the use of coal as a fuel, as it currently accounts for 40% of CO<sub>2</sub> emissions, in line with the Paris Agreement in force since 2016.

The organisation also encouraged participating countries to work together to protect and restore ecosystems, as well as invest resources in protecting agriculture, infrastructure and housing that may be affected by climate change. The need for further action to avoid, minimise and address the loss and damage already occurring due to climate change was emphasised. The UK presented its Adaptation Action Coalition, developed jointly with the UN and other countries such as Egypt and Bangladesh, encouraging countries attending the conference to join the initiative so as to find joint solutions to some of the most challenging impacts.

COP26 encouraged countries to allocate the necessary funding so that the climate agreement actions can be implemented. The agreement provides for a significant increase in capital to help developing countries cope with the consequences of climate change and support the transition to cleaner energy. The pledge made by developed countries in 2020 to commit USD 100 billion per year to these causes, so as to have a fund of USD 1 trillion by 2025, was reaffirmed. Public and private institutions were urged to contribute to the funding needed to assure the global goal of net zero emissions.

The conference concluded that it is critical for all countries to work together to address the climate crisis and accelerate improvement actions.



**MAIN LINES OF WORK FOR COP27**

- Reinforcing the commitment to reduce emissions: limit global warming to 1.5°C.
- Adapting to protect communities and habitats.
- Raising funding for climate action.
- Strengthening international collaboration with a focus on energy transition, land transport and nature.
- Making progress in land use, aviation, maritime transport and infrastructure.

The International Renewable Energy Agency endorses the goals set by the Paris Agreement and plays a key role in helping countries meet their climate commitments. In its June 2021 report, the agency presents a study of the technology options, investment needs and socioeconomic impacts necessary to limit the global temperature increase to 1.5°C. The study argues that 90% of the solutions to meet net zero emissions by 2050 involve renewable energy, improved energy efficiency, green hydrogen and bioenergy with carbon capture. This will require a 30% increase in planned investment for the energy transition up to a total of USD 131 trillion by 2050.



## A new European strategy to address the climate crisis: towards a resilient Europe

### European Environment Agency (EEA)

The European Environment Agency is working in line with the COP26 goals to achieve climate neutrality. It is leading the energy transition and is one of the main drivers of the global climate response, underpinned by rigorous regulations. The European Green Deal prioritises the transition, from all angles, including climate change mitigation as a crucial aspect of efforts to achieve sustainability.

On 9 July 2021, Regulation 2021/1119 of the European Parliament was approved, setting out a framework to achieve this goal and amending the European climate legislation previously in force. The previous target of a 40% reduction in CO<sub>2</sub> emissions by 2030 was replaced by a pledge to achieve a net reduction of 55% by 2030.

In February 2021, the European Commission announced new measures entitled "Forging a climate-resilient Europe - the new EU Strategy on Adaptation to Climate Change". This marks a commitment to a new strategy of adaptation to increasing climate-related threats such as heat waves, forest fires or floods to be implemented by the European Climate Adaptation Platform Climate-ADAPT in order to better understand, anticipate and minimise these threats.

## How has the Covid-19 pandemic affected the environment?

### COVID-19

The European Environment Agency argues that while environmental achievements are the result of many years of striving for sustainability, they have also been affected by the unforeseen Covid-19 situation. Beyond the impact on the daily lives of people and industry, Covid-19 is having a significant effect on the environment. This is due to the impact it has had on energy use and greenhouse gas emissions, primarily in industrial activities and transport. According to the UN World Meteorological Organisation (WMO), the restrictions imposed due to Covid-19 temporarily improved air quality in many places, particularly in urban areas.

Waste generation has also been considerably affected by the Covid-19 situation, which has had an environmental impact. The health measures adopted to tackle the pandemic have increased the use of certain products such as gloves, masks and plastic wrapping for health protection products or food packaging, most of which are single-use items. The consequence has been an increase in greenhouse gases emitted during the manufacture of these products, as well as the accumulation of resulting waste, which has affected ecosystems. But the increase in plastic waste has not only been caused by sanitary waste but largely by the growth in e-commerce. The data highlight the need for waste reduction and recovery strategies, and circular business models.



### Europe believes in a sustainable economic recovery

However, as we gradually return to normality, in 2021 many countries resumed the economic and industrial activity that was impacted in 2020. This means an increase in emissions in relation to the previous year and a risk of returning to more unsustainable practices. How European countries recover from the Covid-19 crisis will largely determine the next steps on the road to sustainability and will mark climate and energy progress in Europe in the coming years.

The Organisation for Economic Cooperation and Development (OECD) has set out an agenda for recovery from the Covid-19 pandemic through the green economy, the latest update having been published in November 2021.



#### GREEN ECONOMIC RECOVERY AGENDA, KEY SPECIFIC ACTIONS

- Reducing the use of fossil fuels: adjust the price of coal and eliminate fossil fuel subsidies.
- Energy transition: invest in clean energy and emission-free road transport.
- Committing to a just transition: share benefits and opportunities.
- Innovation: invest in green R&D.

The European Union's recovery plan, in its budgets approved for 2022, within the EU's 2021-2027 multi-year financial framework, earmarks more than €56 billion for natural resources and the environment. The EU's Recovery and Resilience Facility commits billions of euros to support a sustainable recovery from the Covid-19 pandemic, with at least €248 billion earmarked for climate action to 2026.



### Latest environmental updates in Spain

The Strategic Plan for Health and Environment (PESMA) approved in 2021 and in force to 2025 is Spain's response to the need to address environmental threats. It sets out actions targeting the main aspects of environmental health, in line with the international initiatives of the European Union and the European Green Deal. Its main aim is to help improve the quality of life and environmental conservation, as well as related health challenges, taking account of social inequalities and economic impacts. The PESMA brings together strategies to identify and assess new emerging environmental, climate and health risks and threats that may pose a risk to health, implement a health impact assessment protocol, and fulfil and effectively apply prevailing regulations, without forgetting training and awareness activities.

## 5.2.2 OUR ENVIRONMENTAL PERFORMANCE IN 2021

The Group bases its business objectives on environmental protection and on the suitable management of related stakeholder expectations.

PGZ also has an Environmental Policy and an Environmental Management System (based on ISO 14001:2015 and certified by an external entity), strengthening the Company's commitment to protecting the environment.

In recent years, we have invested in sustainable growth, always taking into account environmental aspects, so that impacts have been uncoupled from production growth. In other words, while we produce considerably more paper than in 1990, the environmental effects have decreased significantly. We promise to press on with this uncoupling process through a sustainable vision of our production, such as the promotion of timber from sustainable sources or the use of management systems to ensure that our products are safe and recyclable while meeting customers' needs.

### 2021 HIGHLIGHTS

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**165,802 t  
CO<sub>2</sub> avoided**

Thanks to focusing on power generation technologies such as cogeneration and biomass, having a lower environmental impact.

**71%**

71% of all the plant's waste is reused externally.

**90%**

90% of our timber suppliers are custody chain certified.

**100%**

100% of the Group's forest assets in Spain and Uruguay are FSC® and PEFC certified.

**ISO 50001  
STANDARD**

We have an Energy Management System under the ISO 50001 standard.

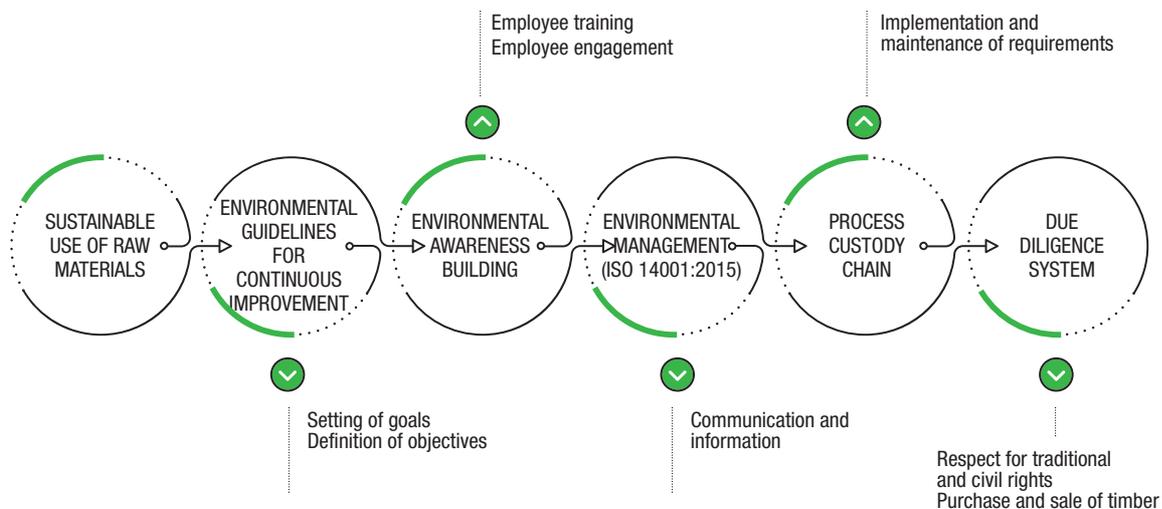
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### Environmental highlights

	2021	2020	2019
Atmospheric emissions of sulphur (kg/t of pulp produced)	0.0070	0.0071	0.0077
Nitrogen oxide emissions (kg/t of pulp and paper produced)	0.83	1.33	0.87
Atmospheric emissions of particulates (kg/t of pulp produced)	0.04	0.10	0.18
Electricity produced in our cogeneration plants as a % of power consumed	187%	190%	198%
External reuse of plant waste (%)	71%	66%	42%
“Hazardous” <sup>(1)</sup> waste as a % of total plant waste	0.3%	0.3%	0.1%
Water used per unit of pulp + paper produced (m <sup>3</sup> /t)	16.6	18.8	16.5
CO <sub>2</sub> saving due to use of biomass and cogeneration (t)	165,802	161,951	240,666
Power consumed (MWh/t)	0.583	0.620	0.552
Heat consumed (MWh/t)	2.65	2.44	2.34
Scope 1 GHG emissions (CO <sub>2</sub> equivalent t)	213,011	195,648	209,635

<sup>(1)</sup> CO<sub>2</sub> emissions calculated and audited in accordance with Decision 2007/589/EC and the specific follow-up plan approved by the environmental authority.

### ENVIRONMENTAL POLICY



### 5.2.3 OUR COMMITMENT TO ENVIRONMENTAL IMPROVEMENT

GRI: 102-11, 307-1

At Iberpapel we want to play an essential role in fostering sustainability in the industry by having a positive influence on our local communities through the environmental impacts of our industrial activity. We therefore align our main strategies with our environmental commitments.

We apply Best Available Techniques (BAT) to a high level in the manufacturing processes with the aim of assuring the least possible impact on the natural environment.

In the Integrated Environmental Authorisation obtained by Papelera Guipuzcoana de Zicuñaga, S.A.U., the Basque Regional Government required fulfilment by the Company of the stringent environmental values set out in the latest BREF in force since September 2018, which lays down all the conditioning factors for industrial operations and the application of Best Available Techniques.

#### **WE PROMOTE CLEAN FUELS >> 165,802 t CO<sub>2</sub> avoided in 2021**

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- Heavy fuels having a high impact on CO<sub>2</sub> emissions are eliminated.
- The carbon footprint is reduced using biomass and natural gas in our industrial activity.

#### **WE USE A NATURAL RAW MATERIAL THAT IS SUSTAINABLE AND TOTALLY RENEWABLE 25,788 ha of forest**

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- We promote timber plantations and sustainable forest management.
- We do not consume trees from natural forests.
- Our activity conserves forests.
- Certification of CO<sub>2</sub> removal at our forests in Uruguay.

#### **WE ENHANCE THE COMPANY'S ENERGY EFFICIENCY**

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- By means of cogeneration, heat and power are generated as efficiently as possible, optimising the fuel employed.

#### **WE FOMENT BIOINDUSTRY AS A CORE ASPECT**

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- From timber, paper plants can make cellulose, paper, bioenergy, biofuels, biocomposites and a large variety of products that require forest fibre.

#### **WE OPT FOR A NEW INDUSTRIAL MODEL OF SUSTAINABLE CONSUMPTION AND PRODUCTION >> 71% of waste reused**

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- We promote a circular economy by reusing and transforming industrial waste into resources.

#### **WE MINIMISE ENVIRONMENTAL IMPACTS**

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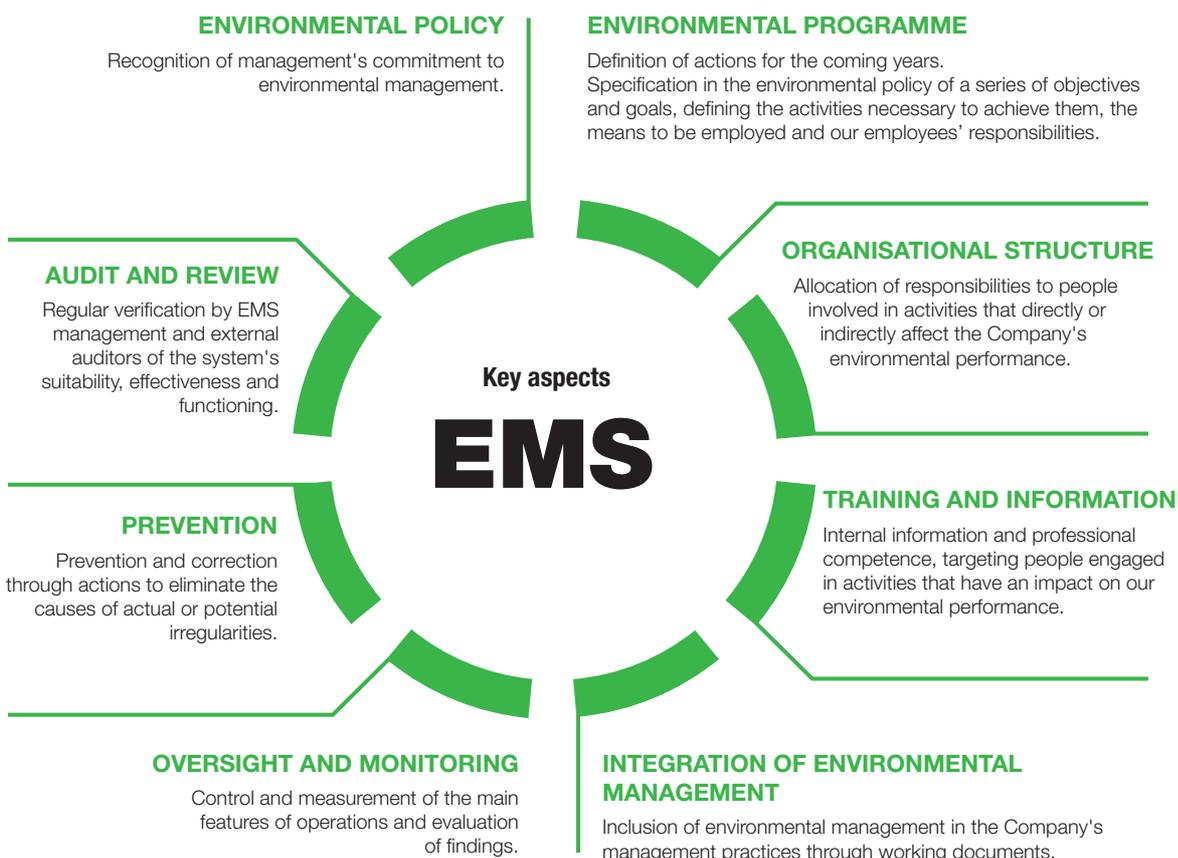
- We reduce greenhouse gas emissions.
  - We seek to cut the pollution load in our discharges.
-

### Our Environmental Management System

We promise to offer the best integrated service to our customers while showing the utmost respect for the environment. We therefore base our actions on the precautionary principle, analysing and managing the main environmental risks through the value chain and addressing both direct impacts on the local area and the indirect impacts of our business.

Our approach to environmental management is grounded in the Environmental Policy applicable throughout the Iberpapel Group. This policy sets out the main commitments and is endorsed by the highest level of company management. It is the basis of the Environmental Management System (EMS) and allows us to control and minimise the main environmental risks associated with our business (see chapter 4.5 on our main non-financial risks), as well as associated impacts. All the employees are aware of the policy.

Our EMS goes beyond regulatory compliance and spans the entire value chain. This system, certified externally by an independent organisation under the ISO 14001 standard, allows us to reach high levels of efficiency in aspects such as energy, water and material consumption, waste generation and greenhouse gas emissions.



At year-end 2021, there is no significant environmental provision or guarantee reflected in the Group's Consolidated Annual Accounts that must be included in this chapter. No fines or penalties have been imposed due to the infringement of environmental legislation.



### MAIN FEATURES OF THE EMS

Environmental Management System certified under the ISO 14001 standard by Det Norske Veritas (DNV), which carries out annual inspections and audits.

- The EMS includes a procedure for monitoring greenhouse gas (GHG) emissions, which identifies emission sources and defines the approach to be adopted to take the necessary measurements so as to verify the allocation of GHG emission allowances under the national allocation plan. Annually, prior to the surrender of emission allowances, GHG emissions are audited by an independent entity.
- The procedure for managing the two custody chains for certified raw materials (timber and pulp) is integrated in the same EMS, guaranteeing traceability from the raw materials to the certified final product requested and received by our customers.
- PGZ has implemented an Energy Management System under ISO 50001. This certification helps to improve energy efficiency and the use and consumption of energy, thereby reducing GHG emissions. The Energy Management System is certified by Det Norske Veritas.

### Environmental training and awareness-building

We consider that training and building awareness in our employees in relation to environmental management and the efficient use of resources has a direct impact on our Group's environmental performance. The purpose of this training and the workshops is to ensure that all our employees contribute actively towards ongoing environmental improvement and are able to respond to issues arising in their activities (waste management, raw materials handling, noisy activities, atmospheric emissions, etc.).

In order to instil the principles and values in our workforce, the contents shared in the training courses focus on the three aspects reflected in the chart to the left.

Before preparing the courses, we identify needs related to the impacts of our activities for inclusion in annual training plans validated by management.



### MAIN CONTENT OF TRAINING ACTIONS

- Environmental awareness-building in all our workers.
- General training of all PGZ's workers in environmental management.
- Professional competence in the functions performed.

**Training for new employees:** All new personnel receive environmental awareness training and are instructed so that they participate and collaborate actively in our EMS.

## 5.2.4 CONSUMPTION OF RAW MATERIALS AND BY-PRODUCTS

GRI: 103-2, 103-3, 301-1

At Iberpapel we are fully aware of the indirect impact the poor management of the supply chain can have on the environment and on people.

We therefore accept that it is essential to apply fair terms and conditions to our collaborators so as to assure the sustainability of their supply chain and the passing on of commitments, covering both the environmental aspects addressed in this chapter and the social and regulatory compliance matters.

Our management systems include a supplier approval and assessment system so as to promote responsible management in our supply chain. Suppliers are classified taking account of technical, financial and other sustainability aspects, such as environmental and social behaviours.

Other environmental criteria are applied during the procurement process, as part of supplier approval, in order to extend the values along the supply chain. In this context, over two thirds of the timber purchased is certified under the FSC® and PEFC standards. Thanks to FSC® certification, we guarantee the highest standards of sustainability through a responsible forest management approach. The PEFC standard assures that economic, social and environmental aspects are being integrated into the chain of custody.

Although the Group does not have a formal procurement policy, it does have various internal purchasing procedures relating to the procurement of timber, raw materials and other warehouse supplies needed in our production plant, which regulate our supplier selection and management procedures, as well as the quality standards required by the Group, so as to guarantee continuity in the supply of raw materials.

Our objectives for 2022 will therefore include defining a Responsible Procurement Policy that includes, among other aspects, the disclosure of transparent information on procurement processes, respect for human and labour rights throughout our supply chain, and promotion of demand for socially and environmentally responsible products and services, thereby strengthening the inclusion of ESG (Environmental, Social and Corporate Governance) aspects in our supplier and subcontractor relations.

According to the European forestry industry, forests managed sustainably in the EU reduce carbon emissions in a volume equivalent to 13% of overall emissions. This is based on the sequestration of CO<sub>2</sub> through the sustainable growth of trees, efficient carbon storage in forestry products and replacement of materials from carbon-intensive industries by sustainable forestry products. The global perception of paper-making as an antiquated, traditional industry is shifting to that of a modern, innovative and sustainable sector which supplies new and renewable materials.





### **DUE DILIGENCE SYSTEM**

We have implemented and we apply a due diligence system to avoid the illegal purchase and marketing of timber and timber products.

#### **Plantations managed for continuous regeneration**

- We work to promote sustainable forest management and the suitable use of both this resource and the land on which it is grown. This forms part of our Custody Chain system that guarantees absolute traceability for customers under the FSC® and PEFC systems.

#### **Our raw material: eucalyptus timber**

- The main raw material is eucalyptus timber, a fast-growing species that contributes to carbon fixation more efficiently than other tree species. Our timber is obtained from plantations, not from forests.
- We foster the use of environmentally sustainable chemical substances and products.
- Other important raw materials used in paper making are calcium carbonate and starch, which are products that occur normally in nature. Polymers are also used as sizing or retention agents, as aids in production.

#### **Our raw material has the following benefits as a renewable, recyclable material:**

- The European Union's forests are estimated to absorb 13% of total greenhouse gas emissions.
- Between 2005 and 2015, European forests grew by 44,000 km<sup>2</sup>.
- Cellulose plants and paper mills can obtain greater added value from timber components and secondary production processes, thereby minimising waste.

The Iberpapel Group's supply chain responsibility, including the management approach to sustainable procurement, Custody Chain System performance and raw material supplier assessment and control, is explained in more detail in Chapter 4.5. Responsibility to our suppliers.

## Monitoring of suppliers and products

The Iberpapel Group has environmental monitoring plans in place for suppliers and subcontractors, which are particularly relevant to assuring traceability in the custody chain (timber and pulp) that reaches the facilities, guaranteeing the sustainable sources of our supplies.

### A. Efficient management of raw material and by-product consumption

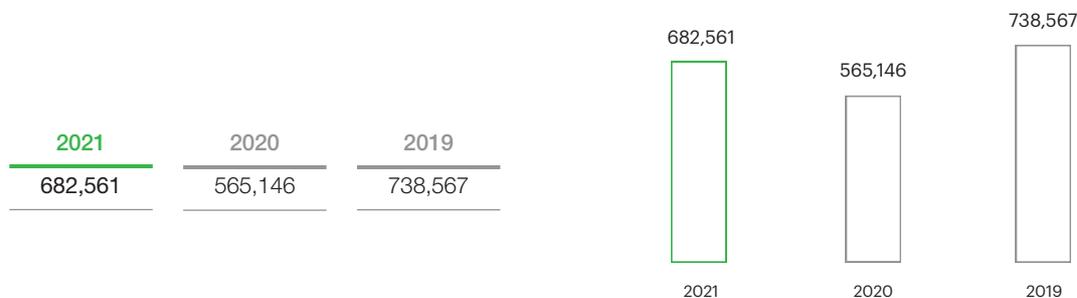
GRI: 301-1

In the last 50 years, worldwide demand for raw materials has risen at an unprecedented pace. According to the European Energy Agency, in this period global production has doubled, the extraction of materials tripled and economic development, measured as GDP, quadrupled. This business expansion is responsible for the loss of 90% of biodiversity and, largely, for the increase in greenhouse gases.

Since our business began, we have sought to become more efficient in the use of resources without comprising either our industrial plant's production or the quality of our products.

This is achieved by applying circular economy principles, which both improve efficiency in the use of raw materials and by-products and prevent the generation of certain types of waste. The aim is to ensure that resources remain useful as long as possible, extracting maximum value from them and recycling and regenerating end-of-life products.

#### Total materials consumed (tonnes)\*



\*Includes: timber, carbonate, long fibre, short fibre, caustic soda, chlorate, starch, sulphur and sulphate, lime, oxygen, chlorate, sulphuric acid, methanol, hydrogen peroxide, other dyes, cationic starch and glues.

In 2015, the EU launched a package of circular economy measures. The circular economy goes beyond reducing waste, addressing aspects such as access to resources, use of materials and related impacts, sustainable design, consumption models and production processes.

## By-products

The European Union has developed the Regulation for Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). All the chemical substances we import and use in our processes are duly registered at the European Chemicals Agency in Helsinki.

## B. Sustainable forest management in the Iberpapel Group

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Our forest management is based on the following principles:

- Certification of CO<sub>2</sub> emission reductions in voluntary carbon markets (VCS).
- Sustained upkeep of the natural resource.
- Preservation and promotion of environmental values such as biodiversity, soil quality, air and water.
- Local community development through job creation.
- Upkeep of social values.
- Support for training or availability of areas freely accessible to the general public.

The surface area managed by Iberpapel in Spain, Argentina and Uruguay is used mainly to sustainably produce Eucalyptus Globulus timber on forest land, with Eucalyptus Grandis as a secondary species.

One of the mainstays of our forestry management is the introduction of the silvopastoral system in South America, which has been recognised by Uruguayan government bodies.

Under this system, trees bind and improve the soil. A microclimate is created under the trees which protects the livestock from the inclemency of the weather, reducing the energy spent. The livestock control the understory, reducing weed control costs, greenhouse emissions and fire risks. This forestry and livestock farming model is highly important in social terms because it integrates previous land uses with a new activity such as forestry without dislocating the traditional activities.

The silvopastoral management system is thus intended to optimise and boost the production capacity of fields previously used as pastureland through extensive livestock farming focused on the rearing of cows and sheep while conserving protected native woodland. It has become an essential tool for the sustainable use, exploitation and management of the natural resources. These production systems allow economic, environmental and social benefits to be obtained.





### **BENEFITS OF SILVOPASTORAL SYSTEMS**

#### **Spain**

- Forestry activities in Spain are integrated into the natural rural highland systems and forestry is complemented by hunting activities.

#### **South America**

- The Eucalyptus Globulus forests planted in South America are managed under a silvopastoral system, a forestry model that combines animal and forestry production on the same land. Our Eucalyptus Grandis are pruned and cleared systematically to obtain quality timber for sawing.

### **ECONOMIC BENEFIT**

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- Increase in yields from forestry activities.
- Improvement of soil productivity.
- Generation of revenue in addition to forest products.

### **ENVIRONMENTAL BENEFIT**

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- The contribution from ruminants to the greenhouse effect is offset by carbon sequestration by trees.
- The energy balance between the calories necessary for the entire production cycle is exceeded by the calories accumulated in the biomass.
- Favourable for biological activity.
- Rise in soil fertility and improvement in soil structure.
- Soil protection.
- Control over water erosion.

### **SOCIAL BENEFIT**

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- Society is better able to enjoy the advantages offered by forests.
- Incentive for people to contribute to the upkeep of forest resources.
- Increased demand for labour and personnel training as more intensive management is needed.

The Iberpapel Group is very aware of the importance of sustainable forestry and our role in driving social and economic development in local communities. We thus opt for a forestry system that is responsible and sustainable, environmentally committed and aligned with the social medium in which our projects are undertaken.

The afforestation of degraded land using silvopastoral systems earned the support of the Uruguayan Ministry of Livestock and Agriculture and Directorate of Afforestation, to the extent that the afforestation project at the San Luis and Piedras de Afilar plantations to protect and recover eroded land using silvopastoral systems was selected by the Uruguayan Government for presentation to the Committee on Forestry (COFO) at the FAO meeting held in Italy in 2007.

The Uruguayan Government's commitment to the silvopastoral projects being carried out by Los Eucaliptus, S.A. is reflected in the Directorate for Afforestation's approval and classification of the plantations as "Artificial Protective Forests" under the silvopastoral and soil conservation system, through the afforestation of Eucalyptus Globulus.

Since 2007, we have worked with the University of Montevideo's Agronomy School, in collaboration with the National Agricultural Research Institute and livestock owners, to improve natural pastures and livestock management within forestry activities, including the continuous improvement of silvopastoral systems, which has increased livestock productivity in fields and allowed higher returns on the investment made by our Group.

Forestry certification is one of the main tools available to guarantee the promotion and development of sustainable management systems. The main objectives of the certification process are to encourage woodland conservation, improve forestry management and facilitate market access for forestry products.



### SOILS

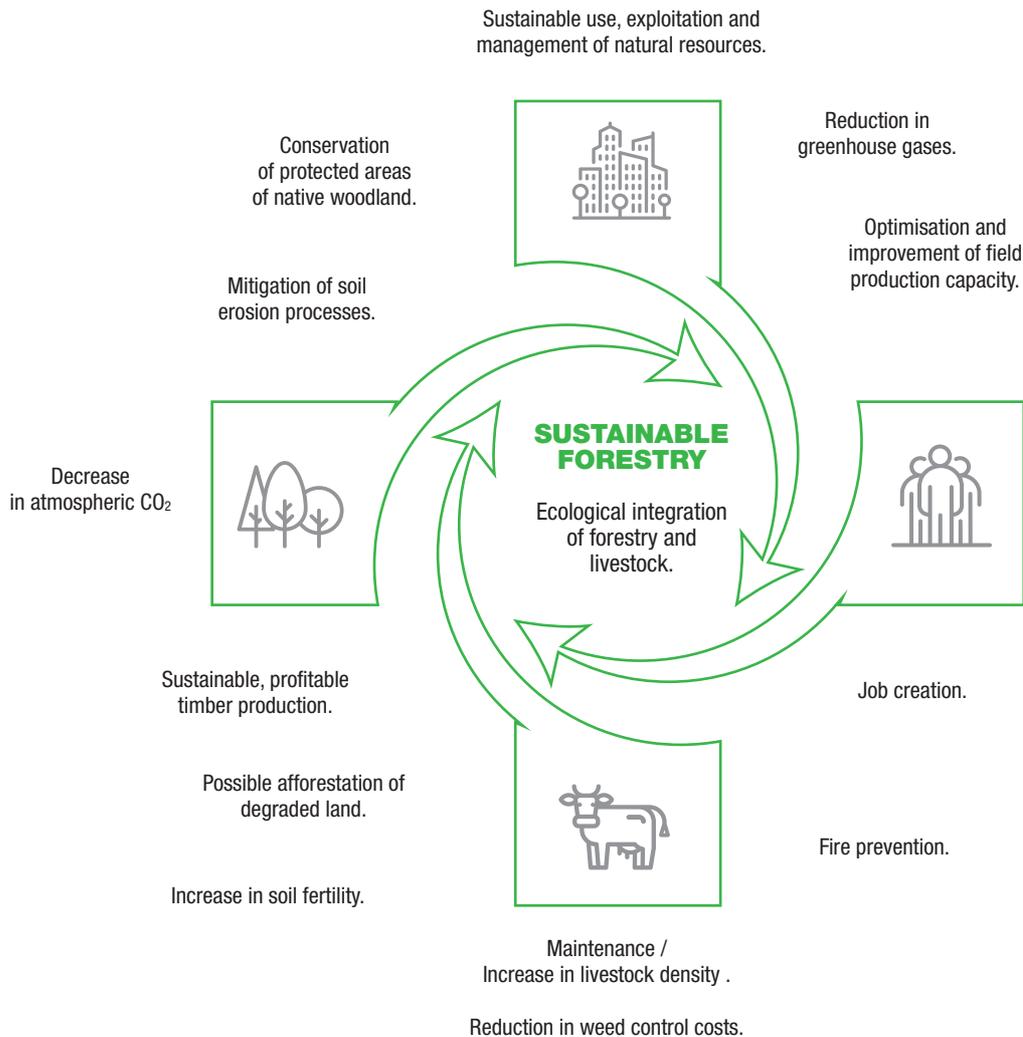
- Soil is among the United Nations' sustainable development goals in its 2030 Agenda, while the European Commission includes soil in its Roadmap to a Resource Efficient Europe.
- Spain also has specific environmental regulations on soil protection and degradation at both the national and regional levels.





**FSC® AND PEFC FORESTRY MANAGEMENT CERTIFICATION**

- The Forest Stewardship Council (FSC®), an international organisation with widely recognised certification processes and product labels, is one of the most prestigious forestry certification systems.
- Our Group’s forestry activities observe this internationally recognised standard. Since July 2008, forest assets managed in Uruguay have been certified under the FSC®’s GFA-FM/COC-002528 Forestry Management Certificate.
- In Spain, our forest assets have had FSC® Sustainable Forestry Management certification under code GFA FM/COC-002538 since 2013.
- In 2019, the Argentinian companies’ forest assets became certified under PEFC/CEFOAR No. UY20/81841041.



C. Proposed objectives of the sustainability model applied in the Iberpapel Group's properties

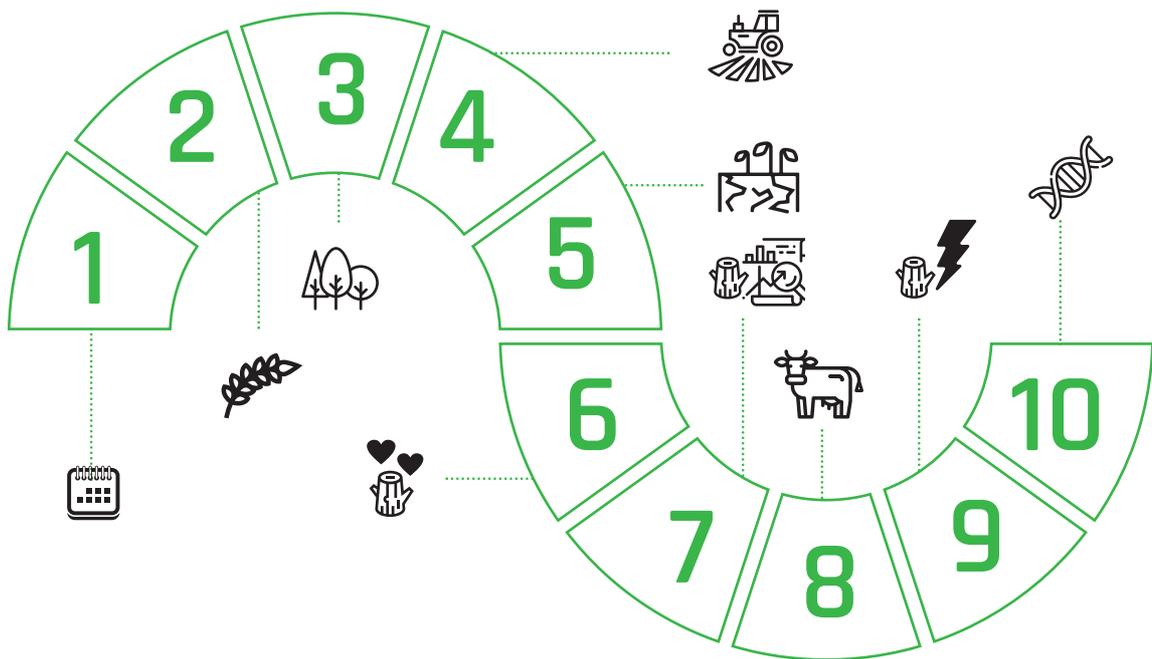
**[1]** Plant forests on forest land during Spring: in the southern hemisphere summer (January, February, March) the land is prepared for afforestation in Spring (September, October, November and December). We use seeds selected from Australia (Jeerelang) and the best clones.

**[2]** Improve the capacity to produce forage in the rest of the field, in the space between rows of trees and in the wet and fertile areas that are not suitable for the eucalyptus trees. At the recently forested properties, the areas between rows of trees are being seeded with the species *Lotus sp.*

**[3]** Conserve and care for the native forest areas recognised by bodies responsible for natural resources: one of the main conditions for FSC® certification of forestry land owned by the company Los Eucalyptus, S.A. is the demarcation and conservation of the native forests on the land.

**[4]** Improve the productive capacity of the land: we are achieving this by means of the best forestry techniques, the introduction of high-quality material and the implementation of integrated silvopastoral systems.

**[5]** Protect the land from erosion processes in areas that are degraded and/or have a high degree of incline: all of the plantations in Uruguay are covered by land conservation projects using silvopastoral systems that include eucalyptus afforestation, declared to be "Artificial Protective Forests" by the local authorities.



**[6]** Produce timber sustainably: as timber is exploited in an orderly manner in terms of time and space, as well as the correct use of new shoots, sustainable production is assured over time.

**[7]** Produce timber profitably: this is achieved through the selection of adequate plantations, use of suitable growing practices and seeding of high-quality materials.

**[8]** Increase complementary livestock production by improving pastures and assuring adequate planting patterns: we achieve this by implementing silvopastoral systems.

**[9]** Produce timber for energy generation using waste not suitable for industrial uses: in Uruguay, timber is habitually used as an energy source and is thus a good application for the wood that is not suitable for our business.

**[10]** Assure appropriate genetic biodiversity: we employ Eucalyptus Globulus clones and seeds selected from diverse sources to increase the variability of our forests.

## 5.2.5 ENERGY AND CLIMATE CHANGE

GRI: 103-2, 103-3, 302-1, 302-2, 302-3, 305-1, 305-2, 305-4, 305-7

According to the European Energy Agency, Europe's energy system increasingly needs to adapt and become more resilient in relation to the changing climate. Climate change and extreme atmospheric phenomena have impacts on the energy system ranging from the availability of primary energy sources through transformation, transmission and power storage to demand. All these impacts must be addressed in the transition to clean energy.

The EU has set various quantitative targets in relation to the energy system in the 2030 energy and climate programme. It has also proposed a strategy to reach a carbon neutral economy in 2050. Since, 1990 the percentage of renewable energy contributed to primary energy has tripled, while the percentage has doubled in power generation. All these scenarios indicate that the levels will increase quickly.

In the paper industry, CEPI, the Spanish association of pulp, paper and board manufacturers, has also launched a road map to reduce carbon emissions by 80% in Europe by 2050, while increasing added value in the business by 50%. The idea is to steer the industry towards European leadership in the low-carbon bioeconomy.

A large part of this strategy is reflected in the Climate Change Policy approved by Iberpapel's Board of Directors in 2018.



### IBERPAPEL GESTIÓN'S CLIMATE CHANGE POLICY

#### 1- Introduction:

The Board of Directors of IBERPAPEL GESTIÓN, S.A. (Iberpapel or the Company) is responsible for determining the general business policies and strategies, and corporate governance policies. The Company has made a pledge to the environment, in general, and to the fight against climate change, in particular.

Climate change is one of the most important challenges that must be faced by humanity in the XXI century. The use of fossil fuels has caused a considerable increase in greenhouse gases that have accelerated global warming.

The international community has agreed to limit the average temperature rise to 2°C above the temperature during the pre-industrial era. Scientists explained that, to limit the temperature increase, global emissions had to peak in 2020 before declining. With this aim, the world's emissions will have to be between 40% and 70% lower than in 2010 and fall to nearly zero by 2050.

There is currently a trend towards a low-carbon-emissions economy that uses resources efficiently while being socially respectful in terms of both consumption patterns and the resulting benefits. It must be based on the use of renewable sources of both energy and raw materials, as well as on collaboration in the efficient use of resources and solidarity.

Iberpapel and its Group companies recognise the gravity of the threat posed by global warming, which must necessarily be confronted in a joint and coordinated way by governments, multilateral bodies, the private sector and society as a whole.

Iberpapel supplies society with products made from renewable materials that require less fossil energy during the life cycle than the majority of other industries, are highly recyclable and also store carbon.

Most of the timber used as a raw material comes from sustainably managed forests. Our plan is energy-intensive, but a large percentage of this energy is obtained from renewable sources such as biomass, which do not add CO<sub>2</sub> to the atmosphere. We use the energy in a highly efficient way by means of cogeneration to produce both thermal energy and power.

This climate change policy is designed to coordinate and disseminate the Group's climate change pledge. Iberpapel and its Group companies recognise the gravity of the threat posed by global warming, which must necessarily be confronted in a joint and coordinated way by governments, multilateral bodies, the private sector and society as a whole.

## 2- Action areas:

Iberpapel and the other Group companies will be active in the following areas in order to implement our climate change commitment:

- We will assure that greenhouse gas emissions are monitored in an accurate, consistent and transparent way.
- We will support the use of timber, a renewable raw material having less of an impact on climate change, as compared with other less sustainable raw materials.
- We will promote sustainable management of our forest resources and the third-party resources that we access in the market.
- We will employ renewable energies in the production process, or fossil fuels having less of an impact on climate change, such as natural gas. No fossil fuels other than natural gas will be used. Bioenergy will be prioritised.
- We will apply highly efficient cogeneration as the most effective means to generate heat and electricity.
- We will continue to develop CO<sub>2</sub> sinks in our forest plantations. The purpose is to provide other organisations with tools to voluntarily offset greenhouse gas emissions captured by our forests. These emission reduction mechanisms will be audited independently.
- We will stimulate research and development of products related to the bioeconomy. These products will in the future replace others currently made using fossil fuels.
- We will foster the circular economy as the most efficient way to use resources. We will promote the use of process waste as a substitute for raw materials in our production process or in other industries.
- We will actively encourage a culture that promotes the efficient and responsible use of energy and behaviours that favour this approach, while involving the Company's stakeholders in the process.
- Iberpapel promises to assess how climate change risks will affect the business.
- Climate change might influence Iberpapel's business model and is therefore on the Board of Directors' agenda.

Applying this policy, which lays down our commitments, we collaborate actively with government bodies to improve the environmental impact of the pulp, paper and board manufacturing industry.

One of the main results of our policy has been the deployment of an Energy and Climate Change Programme that prioritises three strategic action areas covering the most important environmental aspects for both the Group and our stakeholders.

A programme has been designed to prioritise energy efficiency, the use of biomass to obtain energy and CO<sub>2</sub> removal by our forest sinks, as explained in more detail later in this chapter.

In addition to this programme, Iberpapel is active in the field of Best Available Techniques, as reflected in our natural gas cogeneration facilities, which will produce all the power required in our production processes.



### THE IBERPAPEL GROUP, AN ENVIRONMENTAL PIONEER

- We made a pioneering contribution to the United Nations' approval of the first consolidated forest industry methodology, associated with the Kyoto Protocol Clean Development Mechanisms.
- We are the first Spanish paper industry company to obtain carbon credits certified by an independent body for the removal of CO<sub>2</sub> from the atmosphere.



### Energy consumption

The Group fosters a culture of efficient energy management. This commitment is fulfilled by supplementing our ISO 14001-certified EMS with an Energy Management System certified externally by an independent entity under the ISO 50001 standard.

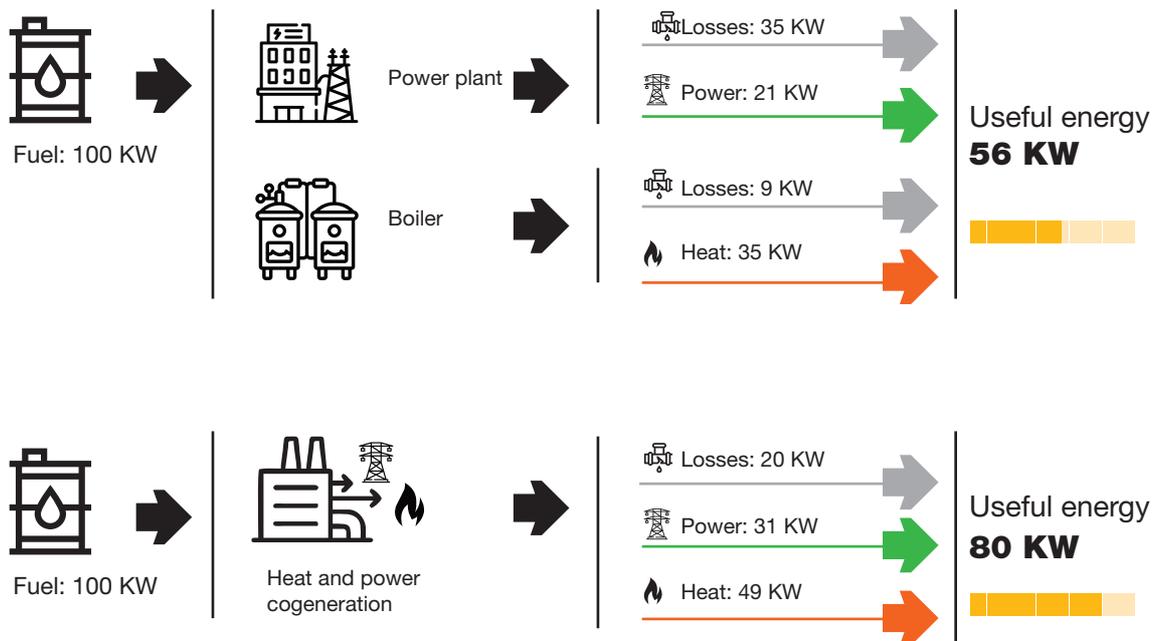
Certification was possible thanks to numerous actions taken to promote energy efficiency and help to combat climate change. We have carried out energy audits to identify potential improvements in lighting, air conditioning and system and process efficiency. We have also eliminated heavy fossil fuels in favour of clean alternatives through cogeneration as the best available technique and heat and electricity generation using biomass.

We have cogeneration systems in our facilities, cogeneration being recognised as a Best Available Technique (BAT) in Directive 96/61/EC. Cogeneration consists of generating thermal energy and electricity in a simultaneous, highly-efficient process, reducing the impact on the environment since it requires less fuel than the separate production of the same quantity of heat and electricity. This technology has brought major benefits to both the Group and the environment:

#### Benefits of using cogeneration

- CO<sub>2</sub> emissions that we managed to avoid through the use of biomass and gas totalled 165,802 tonnes. These emissions have contributed towards the country's overall greenhouse gas reduction objective.

#### SAVING THROUGH COGENERATION AS COMPARED WITH CONVENTIONAL TECHNIQUES



### Efficient energy management

- In 2021, electricity equivalent to 187% of the power consumed in the industrial plant itself and 100% of the thermal energy needed was produced by cogeneration, all from biomass and using a high-performance gas combined cycle.
- It is important to mention that the Group does not use heavy fossil fuels.
- The Iberpapel Group's natural gas consumption in 2021 totalled 3,786,000 GJ, most of which was used to generate thermal energy and power through high-efficiency cogeneration.
- The use of the best available techniques applicable to our industry keeps the Iberpapel Group within very high energy efficiency ratios.

### Energy consumption in our cogeneration plants

Gj	2021	2020	2019
Natural gas	3,786,000	3,494,955	3,731,000
Biomass	2,602,000	2,237,997	3,166,532

### Energy generation in our cogeneration plants

Gj	2021	2020	2019
Power*	1,657,000	1,435,637	1,722,500
Steam**	4,043,000	2,973,794	3,687,870

\* The power generated in our cogeneration plants is fed into the grid under an all-inclusive scheme.

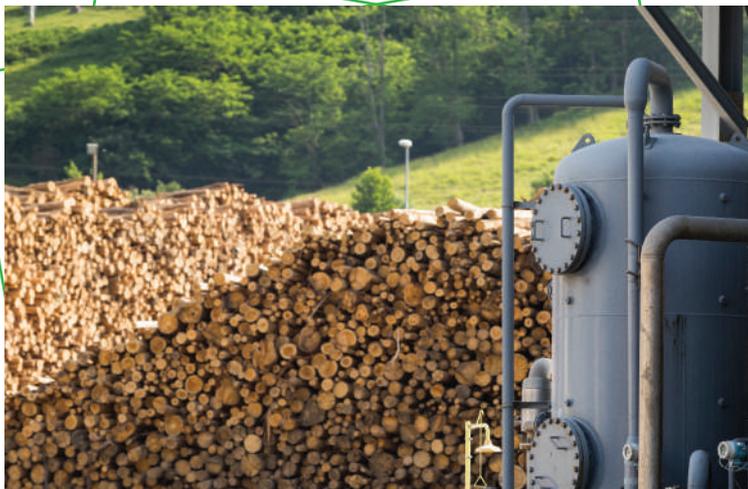
\*\* The steam generated is consumed by our facilities (self-consumed steam).

In 2021, electricity purchased from the grid and consumed at our facilities totalled 821,533.13 Gj.



### **BIOMASS: A KEY PILLAR OF OUR CIRCULAR ECONOMY**

- One of the pillars of our circular economy system is the use of biomass to obtain energy.
- In the search for alternatives to fossil fuels, we use a part of the organic waste from our processes (in this case, biomass), applying the principles of the circular economy, as a renewable resource to generate green energy. We can therefore reduce demand for fuel using non-polluting alternative sources.



## Combating climate change

Our strategy to combat climate change is grounded in our Climate Change Policy, which is designed to coordinate and disseminate our pledges.

The policy is the basis of our Energy and Climate Change Programme which, as commented at the start of this chapter, prioritises three strategic areas for the Group in the fight against climate change. We promote the reduction of greenhouse gases (GHG) through solutions that draw on energy efficiency, the use of biomass for energy and carbon dioxide removal by our forest sinks.

As regards our forest sinks, the forestry industry can make a huge contribution to GHG reduction and the adaptation to climate change.

The Group avoided emissions amounting to 165,802 tonnes of CO<sub>2</sub> that would have been released in 2021 had the power been generated using conventional methods. Additional power would have been lost during transmission from the generation point to the point of use, which is also avoided through in situ cogeneration.

Our use of cogeneration considerably cuts GHG emissions compared with the separate generation of heat and power.

### Atmospheric emissions of CO<sub>2</sub> avoided (tonnes)

2021	2020	2019
165,802	161,951	240,666

## Carbon footprint

The Iberpapel Group calculates its carbon footprint in two emission scopes: direct (Scope 1), which include those derived from the consumption of fossil fuels in production facilities, and indirect (Scope 2) related to power consumption.

### Emissions per scope

CO <sub>2</sub> -equivalent tonnes	2021
Scope 1 GHG emissions	213,011
Scope 2 GHG emissions	31,493
Total GHG emissions	244,007

Direct emissions include those arising from the consumption of natural gas in the cogeneration plant and the lime kiln; no other fossil fuels are consumed. There were no emissions due to refrigeration gas leaks in 2021. Most of Iberpapel's refrigeration equipment uses ammonia, a refrigeration gas that does not contribute to climate change.

The Group does not have a fleet of vehicles, so Scope 1 emissions do not include mobile sources.

Biomass combustion is regarded as carbon neutral because the CO<sub>2</sub> liberated during combustion equals the CO<sub>2</sub> absorbed by the plants during growth, which is the natural carbon cycle.

The use of cogeneration and biomass brings environmental benefits, particularly the reduction of emissions during the generation of power and thermal energy, given the high efficiency of this generation system. The emissions saved by Iberpapel thanks to the self-supply of energy, the use of biomass and the export of any surplus into the grid are quantified as follows:

### Emissions per scope

CO <sub>2</sub> -equivalent tonnes	2021	2020	2019
CO <sub>2</sub> saving due to use of biomass and gas cogeneration	165,802	161,951	240,666

We are currently working on quantifying and establishing CO<sub>2</sub> emission reduction targets in the medium and long term so as to align with the decarbonisation strategy identified as one of our challenges going forward.



#### REDUCTION OF GHG EMISSIONS IN THE DISTRIBUTION PHASE

Iberpapel uses five-layer pallets instead of four in the distribution phase in order to reduce GHG emissions. By means of the pallet's structure, we always seek to optimise transport, handling and storage. By optimising transport, associated emissions are also reduced.

Four-layer pallets optimise stowage when maritime container are used. This pallet is designed for a global market and long distances, with all that this means as regards the carbon footprint, relocation, etc.

But the five-layer pallet optimises short-distance transport. It is designed for use in local markets. Our customers therefore minimise the carbon footprint until the products reach their facilities.

### Kyoto Protocol mechanisms

PGZ, as Iberpapel's only facility subject to the emissions trading system, must comply with the relevant regulations and is therefore required to obtain GHG emission authorisation, to continuously monitor atmospheric emissions and to surrender one allowance per tonne of CO<sub>2</sub> emitted.

All operations holding emission allowances are reflected in the plant's credit account in the European electronic register. In the first quarter of 2022, the Company, fulfilling its legal obligations, will surrender the quantity of allowances covering its 2021 CO<sub>2</sub> emissions, amounting to 213,011 tonnes.

The Clean Development Mechanism (CDL) is an agreement arranged under Article 12 of the Kyoto Protocol which allows the governments of industrialised countries or of the countries included in Annex 1 to the Kyoto Protocol and their companies to enter into agreements so as to meet GHG reduction objectives.

CO<sub>2</sub>: The EU's emissions trading system is operational in all 28 Member States plus Iceland, Liechtenstein and Norway. It applies to approximately 11,000 power plants and industrial facilities in different sectors. This system covers around 45% of greenhouse gas emissions generated.

In 2021, phase four of the Emissions Trading Directive, which runs from 2021 to 2030, was launched. In Spain, around 1,000 facilities are affected in energy intensive sectors such as power generation, refineries, steel, cement and paper, among others.

The system covers emissions of carbon dioxide, nitrous oxide, perfluorocarbons and nitric, adipic and glyoxylic acids.

During the year, we requested the allocation of allowances for phase IV. Since the start of phase III, as recognised by the European Commission, emission allowance allocation takes place through an auction system, which is seen as the most efficient method. In the new phase, the auction system will remain the general rule, free allocation being an exception associated essentially with sectors exposed to the risk of carbon leakage. The revised directive states that, as before, no emission allowances will be allocated free of charge in relation to power generation.

In our case, free allocation is based on a product benchmark associated with the most efficient European plants and related to the facility's production.

As from 2021, the European emission ceiling will decrease annually by 2.2%, this being the linear reduction factor (LRF), which will lead to a 43% decline in emissions by 2030 as compared with the 2005 level, which is one of the European Union's key climate change strategies, the LRF in phase III being 1.74%. So there will be fewer free allowances available in phase IV than in phase III. Another new aspect in phase IV is that the trading period will last for 10 years (2020-2030) instead of eight, consisting of two allowance allocation periods.



### Other atmospheric emissions

In Europe, the most problematic pollutants in terms of human health are particulate matter in suspension, ozone and nitrogen dioxide. SO<sub>2</sub>, NO<sub>x</sub> and NH<sub>3</sub> can also cause acidification and eutrophication in ecosystems, as well as harm to buildings and vegetation.

According to the European Energy Agency report on air quality in Europe, the most important pollutants associated with air quality are particulates, ozone, nitrogen oxides, sulphur dioxide, carbon monoxide, benzene and metals. As regards particulates smaller than 2.5 micras, values above the stipulated limits were recorded at 7% of measuring stations and in seven of the 28 European Union countries. Values above the limit were also observed for nitrogen oxides in 10% of measuring stations, although 86% of these cases were directly related to traffic. Episodes of pollution associated with sulphur dioxide fell to 2% of all measuring stations, while exposure to the pollutant carbon monoxide above recommended limits is very infrequent. Finally, emissions of arsenic, cadmium, nickel, lead and mercury fell considerably during the period 2000-2017 due to the improvements in industry and power generation.

We control and reduce atmospheric emissions as part of our commitment to well-being in society. The Group's only activity that could generate emissions of this kind is conducted in our industrial division, specifically the paper mill.

PGZ's atmospheric emissions are mainly associated with the processes employed to generate the power required for its industrial activity and fundamentally consist of carbon dioxide (CO<sub>2</sub>), sulphur dioxide (SO<sub>2</sub>) and nitrous oxides (NO<sub>x</sub>). Additionally, the use of biomass generates particulates and total reduced sulphur compounds.

One specific feature of our emissions is the lower concentration of sulphur dioxide due basically to the use of clean fuels such as biomass and natural gas. In 2021, emissions amounted to 0.007 kg/product tonne.

Nitrogen oxide emissions are generated at the biomass plant and the cogeneration facility due to the presence of nitrogen in the fuel's composition or in the atmospheric air used in the combustion process. Emissions of this compound in 2021 amounted to 0.83 kg/product tonne.

The main points at which particulates are emitted into the atmosphere are the lime kiln chimney and the recovery boiler chimney, both of which have electrostatic precipitators to reduce emissions. Emissions of the smallest particulates, referred to as PM10, totalled 0.036 kg per tonne of pulp produced in 2021. Both the boiler source and the furnace source are permanently connected to the Basque Government's atmospheric surveillance network, supplying the authorities with real time emission values.

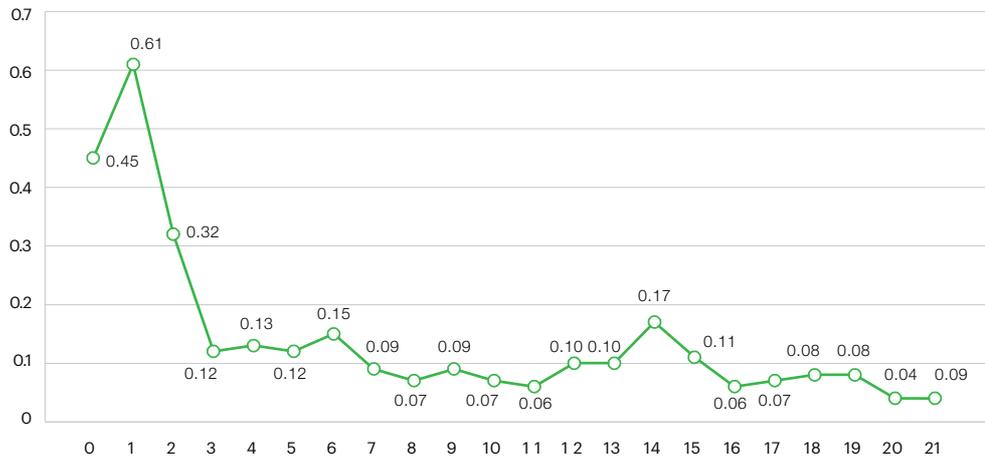
PGZ has a number of odour elimination systems that considerably reduce the impact on the surrounding area. Using these systems, reduced sulphur compounds, which are mainly responsible for the smell, are channelled to the recovery boiler where they are burned, making use of the sulphur content, which is reincorporated into the process. These technologies are classed as BAT (Best Available Techniques) in the European BREF document on the manufacture of pulp and paper.

All emission points are analysed and inspected periodically by independent bodies validated by the administration. Findings are reported periodically to the administration. Our measuring equipment is calibrated by an external entity and maintenance contracts ensure that it operates reliably throughout the year. The findings of some of these ongoing emission controls are shown below.

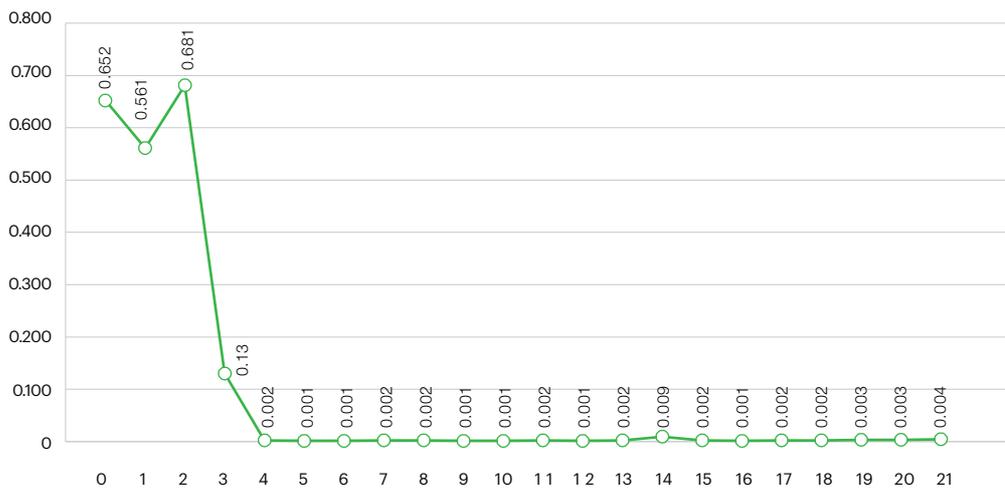


As regards air quality in Europe, the data reflect a slow improvement attributable to both past and present policies, and technological progress. Yet the high concentrations of pollutants in the atmosphere are still having a major impact on the health of Europeans, the most damaging being particulate matter in suspension (PM), nitrogen dioxide (NO<sub>2</sub>) and tropospheric ozone (O<sub>3</sub>).

**PM10 atmospheric emissions (2020-2021)** (kilos of particulates per tonne of paper and pulp produced)



**SOx emissions (2020-2021)** (kilos of particulates per tonne of paper and pulp produced)



## Clean energy

From the viewpoint of the European paper industry, energy is considered to be a key matter at present and also in the future. As energy can account for over 30% of a plant's operating costs, the paper industry has invested in sustainability and renewable energies; it is now one of the energy-intensive industries that relies least on fossil fuels. The industry has made large investments in cogeneration and in other energy efficiency measures, achieving a 20% reduction in GHG emissions in the last decade.

At the end of 2016, the European Commission published the proposal "Clean energy for all Europeans", better known as the "Winter Package", comprising several legislative proposals designed to complete the internal power market and implement the so-called "Energy Union".

The proposed legislative measures are intended to:

- Create a common energy market in the European Union and assure that energy systems are adequate.
- Promote better integration of electricity generated using renewable sources and implement bioenergy sustainability principles.
- Progress towards energy efficiency in buildings, industries and transportation in order to meet climate objectives.
- Implement governance rules for the European Energy Union.

These objectives will be achieved by reforming the Internal Electricity Market Directive, the Electricity Market Regulation, the Renewable Energies Directive, the Energy Efficiency Directive, the Energy Performance of Buildings Directive and other less significant regulations.

The impact of these changes, combined with the current reform of the ETS market, is very significant, so European industry is following the process initiated by the European Commission with great interest. Various European associations have signed a joint statement requesting the Commission's involvement.

The Emissions Trading Directive (EU-ETS) imposes penalties of €100 for every tonne of CO<sub>2</sub> emitted that is not offset by 1 EUA (European Union Allowance) within the stipulated annual period. Additional penalties may be established by the Member States.



## 5.2.6 WASTE MANAGEMENT AND CIRCULAR ECONOMY

GRI: 103-2, 103-3, 306-2

In the paper industry, one of the key aspects of environmental management is adequate waste management. Yet the efficient use of resources does not only relate to the improved use of raw materials but also to the concept of a circular economy, which brings the materials contained in waste back into the process, either in the same company or in other facilities, to generate new products or raw materials.

We prioritise the reuse of resources in our activity, assuring a second use inside the plant and thus contributing towards the circular economy. One example is the use of carbonate slurry generated at the causticizing plant as a raw material in the production of lime that can be used in the same plant. Other examples are the reuse of water from the paper machines as a substitute for clean water in the pulp manufacturing process or the use of biomass as a green energy source, already mentioned in the Energy and Climate Change section of this chapter.

However, some materials are generated during the manufacturing process that cannot be reused in the process and become waste.

Process waste is mostly classed as non-hazardous waste and only a small part is deemed to be hazardous (specifically, 0.3% in 2021, in line with 2020). This basically relates to oils, batteries, fluorescents or laboratory reagents associated with all industrial activities, which are managed by authorised companies.

All wastes are separated at source in each production plant and are individually managed. The main wastes generated in 2021 during the production of cellulose and paper were carbonate slurry, caustic sludge, and water and bark treatment sludge. Others, such as plastic, paper and cardboard, metal waste and other waste that is similar to ordinary municipal waste were also generated. They are all considered to be non-hazardous.

The most frequently used approach to waste reuse is through the cement industry, particularly in the case of carbonate slurry from our lime kiln. The calcium carbonate that we supply to the cement producers replaces the limestone that they need to quarry; we provide a consistent, ground waste which they use as a raw material, in a clear example of the circular economy.

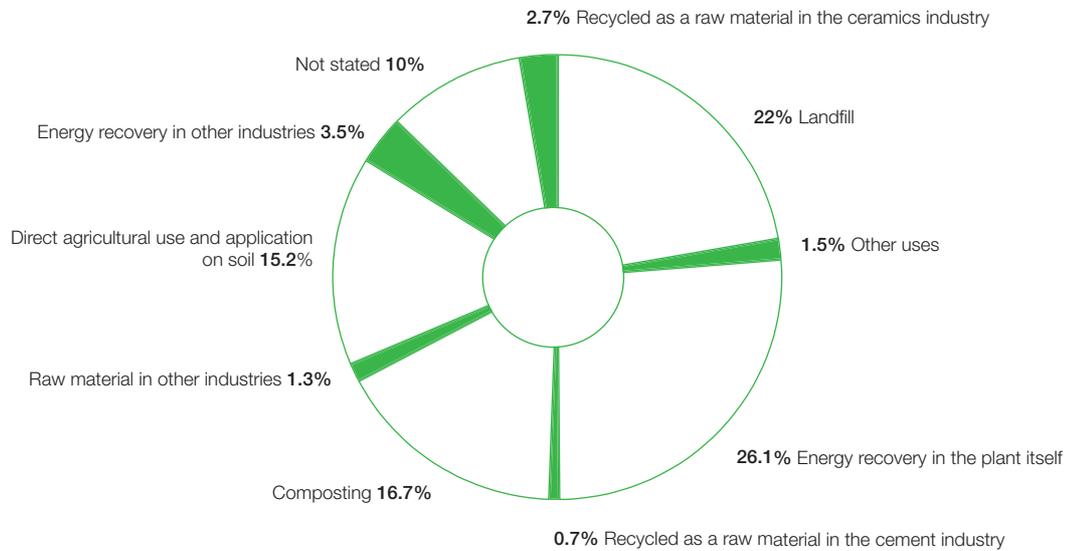
The option employed for waste fractions that cannot be used in other sectors is a landfill.

In 2021, 29% of waste generated was deposited in landfills when reuse or recovery was not an option.

Through PGZ, Iberpapel participates in various projects with the aim of reusing this waste in a way that is technically and economically feasible, so that the smallest possible fraction is sent to a landfill.

At the industry level, according to the data furnished by ASPAPEL in its 2020 Sustainability Report, the management of waste from the paper process may be summarised as follows:

**Waste management in the paper industry**



**Waste generation at PGZ**

	2021	2020	2019
Hazardous waste (t)	84	18	84
Non-hazardous waste (t)	27,656	9,880	76,213
Total waste (t)	27,740	9,898	76,297
% hazardous	0.3	0.18	0.11
% waste recovered or reused	71	66	42
% taken to landfills	29	34	58

### 5.2.7 LIQUID EFFLUENTS AND WATER USE

GRI: 103-2, 103-3, 303-1, 303-2, 303-3, 306-1

Water is essential in the manufacture of cellulose and paper to break up and carry fibrous materials and additives. Water is also used as a heat exchange fluid, to seal pumps and vacuum systems, and to generate steam, basically.

Unlike other major water users, the pulp and paper industry returns the majority of the water to the natural environment. The water is returned to surface waters once it has been properly purified.

Pulp and paper manufacturing plants strive to reduce water consumption and improve the quality of water discharged into the natural environment. With this aim, water is reused as much as possible in the different processes and the water that cannot be finally reused is purified.

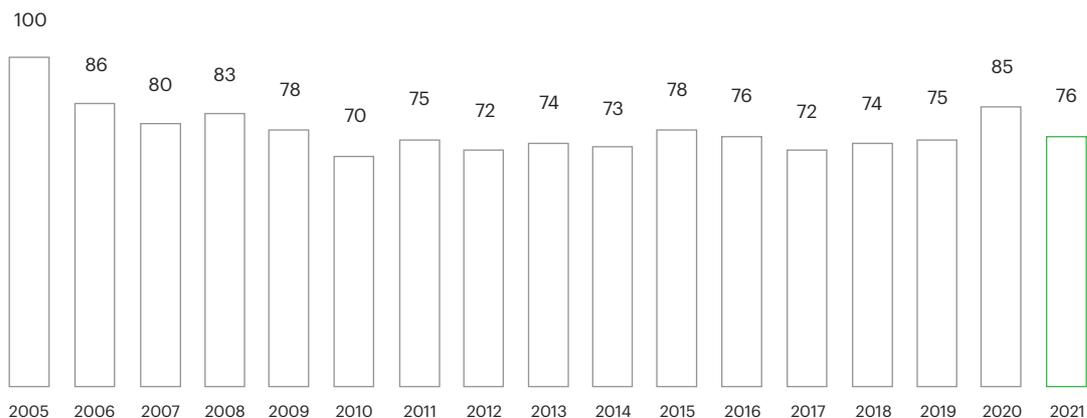
PGZ prepares water consumption reduction plans as a basic tool to control water use. These plans allow us to maintain the low levels of water consumption stated in the BREF document issued by the European Commission on BAT in the pulp and paper industry.

Specifically, in 2021, 16.6 m3 of water was used per tonne produced, representing an increase of 12% on 2020. These values are much lower than the ranges described in the BREF for BAT application.

#### Percentage water capture by source

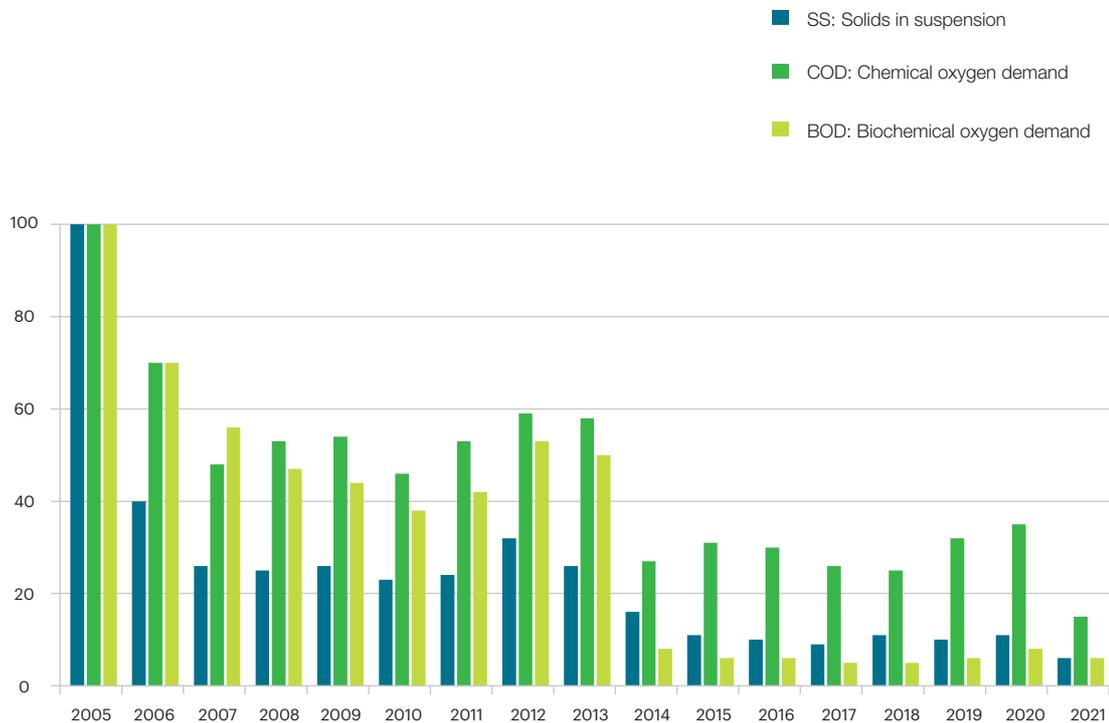
%	2021	2020	2019
River water	75.30	70.00	80.09
Groundwater	24.70	30.00	19.91

#### Percentage use of fresh water (base 100 2005)





Percentage effluent load (base 100 2005)



In recent years (2005-2021), PGZ's effluents have improved considerably and now contain only 6% of their initial suspended solids, 15% of their initial chemical oxygen demand and 6% of their initial biochemical oxygen demand.

### 5.2.8 BIODIVERSITY PROTECTION

GRI: 103-2, 103-3, 304-1, 304-2, 304-3

We observe and monitor biodiversity during our activities, leading to the identification and declaration of high conservation value areas in Uruguay, Argentina and Huelva. Periodic biodiversity (fauna and flora) monitoring is conducted by independent professionals in our properties, based on indicators (species that are in danger of extinction, vulnerable or exotic; new species, unique habitats, etc.), thereby obtaining insight into the biological diversity in each ecosystem.

This monitoring serves to identify the areas which show the most biodiversity and declare them to be areas of high conservation value. Currently we have declared an area of approximately 80 hectares called "Cerro del Betete", in the eastern region of Uruguay, and another area of around 700 hectares of protected rural highland in Argentina to be areas of high conservation value, all this forest heritage having been certified under the international FSC standard GFA-FM/COC-002538-C on sustainable forest management and marketing of roundwood, firewood, cork and game.

In the properties in Argentina there are natural areas that must be conserved and protected due to the wealth of native flora and fauna in the habitats, which are classed as conservation priorities. The regulation and management of these areas is regarded as a priority. So, in 2009 Iberpapel initiated a biodiversity monitoring programme to study the natural areas inside the properties and the seasonal evolution of species and communities.

In 2017, an Environmental Management Plan for the "La Pellegrini" Protected Natural Area was drawn up and implemented. This plan is the core instrument for spatial planning and organisation, defining and contributing to the management and conservation of resources in the protected area, as well as providing the guidelines and policies for the administration of the area, management approach, uses and permitted activities, as a result of the diagnosis and analysis of all relevant factors. The main purpose of the plan is to protect natural ecosystems that have a high conservation value such as native woodland, wetlands and water reserves. The ecosystem targeted as a "Protected Landscape" has gallery forests and a variety of forest strata in which abundant shelter, food and habitats for local animal populations may be found. It is vitally important to include the ecosystem in the Provincial System for Protected Natural Areas, guaranteeing social and governmental engagement following the guidelines laid down by Provincial Law 8967/95.



Mariposa Juno. Author: Gabriel Bonomi

In Argentina we have a Sustainable Forest Management Policy based on the sustainable management of resources that respects the environment and has a positive economic and social impact. Since 2018, the Iberpapel Group has been certified for the Sustainable Forest Management of its Argentinian assets under the international PEFC/CERFOAR standard, certificate number UY20/8184041.

As part of this policy, a study was conducted on the possible effects of the Iberpapel Group's activities on our local environment. This study, which consisted of a cartographic analysis and field research, identified the partial loss of productive land and soil due to the effects of harvesting practices and the movement of the machinery used as one of the main adverse impacts. Aware of the importance of this potential effect of our activities, Iberpapel Argentina helps to conserve soil by using equipment and practices suited to the soil and topography, besides controlling erosive processes in certain areas through the growth of forest plantations, which also favours carbon fixation.

Agrochemicals such as fertilisers and pesticides could also impair the quality of grid water. Therefore, besides observing manufacturers' recommendations, the Iberpapel Group complies with Law 6599 on the use of pesticides, which establishes the minimum distance from native forests and bodies of water to be conserved when using agrochemicals. Harvesting near watercourse protection areas could also pose a risk to water resources, so the Iberpapel Group respects the protection areas while planning and preparing access routes and the areas to be harvested, thus minimising not only the possible impacts on water resources but also preserving the habitats of the flora and fauna to be protected.

The study identified a significant positive socioeconomic impact through the generation of local employment, prioritising labour for tillage and harvesting activities, as well as for the distribution and marketing of the Iberpapel Group's products, bringing added value to the region.

As a result of the analysis of the main impacts and with the aim of minimising adverse impacts while enhancing positive outcomes, a number of prevention and mitigation measures have been developed, ranging from land preparation and harvesting to waste treatment and management of the forest plantation. In this way, the Iberpapel Group applies a sustainable and environmentally friendly methodology throughout our value chain, helping to protect biodiversity.

In Uruguay, a Management Plan has been implemented for the High Conservation Value Forest (HCVF) named "Cerro Betete", covering an area of 80 hectares in the department of Maldonado, in the east of the country. The main purpose of this plan is to protect the natural areas with the most value in terms of ecosystem functions at the Sophie Point property. This area has an exceptionally significant biological, ecological, social and cultural value for the region and the country as a whole. Besides the ecosystem's main biodiversity features, information has been gathered in various conversations with the community, emphasising that sociocultural value is the attribute that makes it stand out as a HCVF. The company has defined it as an area of sociocultural interest with a focus on the conservation of this landscape and cultural ecosystem. Conservation plans are also under way in the areas of native forest in our other properties. Since 2007, the Iberpapel Group has had all its Uruguayan forestry assets certified under the international FSC standard, certificate number GFA-FM/COC-002528.

To ensure responsible and sustainable management of the areas in which the Iberpapel Group operates in Uruguay, an environmental impact assessment plan was implemented in 2021, applying the Code of Good Forestry Practices as a technical reference document. Though not significant, the following minor impacts have been identified during the installation and harvesting phases and have been addressed by means of mitigation and/or prevention measures:

- Impact on surface water: possible decrease in water quality due to the entrainment of eroded soil following the installation phase. The Iberpapel Group has brought in contour ploughing to minimise erosion.
- Impact on soil: soil erosion was identified during the installation and harvesting phases. To prevent and mitigate this possible impact, contour strips were implemented and actions were taken to preserve covered or grazed areas. Measures were also taken to prevent the dragging of harvesting materials and mark out traffic paths for the movement of machinery.
- Biodiversity impact: during the installation phase, a part of the vegetation cover is removed, but the disturbed area is minimised by tilling in strips and planting fodder species.

The Group's activities in turn generate significant positive environmental impacts. This includes the restoration of degraded land, which considerably recovers its productive capacity thanks to eucalyptus plantations, which significantly reduce erosive processes and increase water infiltration and soil fertility. The Group's activities also contribute to the conservation and sustainable management of native forests by using exotic species for afforestation, thus supporting the conservation of local biodiversity.

In Spain, as a result of the environmental impact studies carried out to modernise the Hernani plant, local biodiversity was recently analysed. The potential natural vegetation consists of riverside species, specifically Cantabrian alder trees (*Hyperico androsaemi*), typically found on waterlogged river banks, as the dominant and sometimes the only species, black alder trees (*Alnus glutinosa*) and ash trees (*Fraxinus excelsior*), plane trees (*Acer pseudoplatanus*) and willow trees (*Salix* sp.), with an understory rich in shrub-like species such as hazels, blackthorns and roses, and a rich and varied herbaceous layer. Atlantic oaks (*Quercus robur*) can be seen further away from the river.

The fauna is conditioned by the urban environment. In the surrounding areas, there may be examples of the common toad (*Bufo bufo*), the Iberian green frog (*Rana perezi*) or the palmate newt (*Lissotriton helveticus*). From the bird world, there are song thrushes (*Turdus philomelos*), European robins (*Erithacus rubecula*) and white wagtails (*Motacilla alba*). Common kingfishers may also be spotted (*Alcedo atthis*). Representing mammals, there are hedgehogs (*Erinaceus europaeus*), moles (*Talpa europea*), Pyrenean desmans (*Galemys pyrenaicus*) and European minks (*Mustela lutreola*). River fauna would include common minnows (*Phoxinus phoxinus*), stone loaches (*Barbatula barbatula*) and salmon (*Salmo salar*).

In line with our values focusing on biodiversity protection and preservation, the Iberpapel Group plays an active role in voluntary initiatives through APOM (local association of rural highland owners).

Since January 2019, the Group has voluntarily participated in the Forum for the Defence and Conservation of the Dehesa (ENCINAL) to ensure the preservation and conservation of agroforestry ecosystems. Since 2020, the Group has been an active member of the Spanish Forestry Technology Platform (PTFOR), which has the mission of promoting the forestry industry in Spain, as well as the industries in its value chain, in relation to competitiveness and sustainability in economic, social and environmental matters. Industrial development is pursued through technology, innovation, training and internationalisation.



Picaflores de Barbiljo. Author: Gustavo Berón



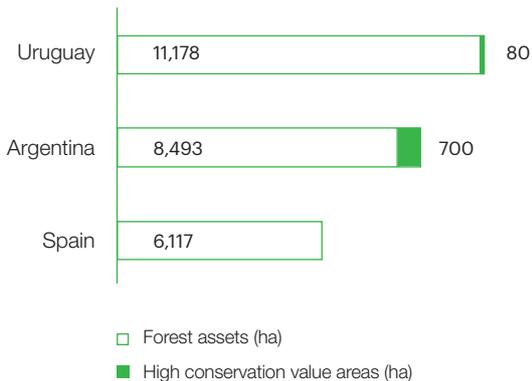
### HABITAT CHARACTERISATION AND WILDLIFE MONITORING

In December 2020, three studies were carried out to characterise habitats and monitor fauna in the San Luis, Bella Vista II and Don Alcides properties in Uruguay. This entailed drawing up and categorising lists of species based on international conservation lists (UICN, CITES) and Uruguay's InBUy database of Invasive and Alien Species. The studies found that the values showing the wealth and abundance of birds remain at medium-high levels compared with other regions of the country and that the number and proportion of species of fauna that are threatened to some extent or are conservation priorities remain stable in relation to the previous study.

Cardenal Común. Author: Nicolás Monzón



Forest assets and high conservation value areas (ha)



**FOREST FIRES**

- Since 2018, the Company has been a member of Uruguay’s PAIF (Forest Fire Protection Plan), which is coordinated by the Uruguayan Forestry Producers Association. This national system involves the majority of forestry industry companies and protects an area of nearly 850,000 hectares.
- In Argentina, since the year 2000, all the properties have been members of ACE Colón Norte (association of business partners), taking part in forest fire surveillance activities in the summer months.
- As part of the prevention of and fight against forest fires, the Iberpapel Group's socioenvironmental policy includes voluntary participation in Forest Defence Groups (ADF). At present, 100% of the forest area in Huelva collaborates with this social engagement initiative.
- In March 2021, Iberpapel took part in forest restoration on the "El vinagre" property in Huelva, spanning an area of 2 ha affected by a fire in 2019. This action was carried out under the sponsorship agreement between APOM and FSC® Spain.



Reforestation.  
 “El vinagre” property,  
 Huelva

### 5.2.9 IMPORTANCE OF THE BIOECONOMY

In 2012, the European Commission approved the strategy “Innovating for Sustainable Growth: A Bioeconomy for Europe”, which defines the bioeconomy as an economic model based on the production of renewable biological resources and the conversion of these resources into value-added products such as bioproducts, bioenergy and services. It has emerged in response to current environmental and social challenges to ensure a fair food supply and distribution, mitigate the effects of climate change and reduce the use of fossil fuels. It also creates opportunities for economic development and employment.

This is a boost for the bioeconomy, a low-emissions economy that promotes sustainable management in agriculture, fishing and food security, using resources sustainably.

According to the European Commission, the core sectors involved are agriculture, forestry, fishing and pulp and paper manufacturing, plus, to a lesser extent, chemicals, biotechnology and energy.

The European cellulose and paper sectors are at the forefront of the bioeconomy, in which renewable raw materials are replacing fossil resources, thereby helping to improve the environment and the quality of life as part of the reduction in the impacts of climate change.

The Confederation of European Paper Industries (CEPI) has launched its CEPI 2050 roadmap, designed to:

- Cut the industry’s fossil CO<sub>2</sub> emissions by 80%.
- Increase the added value of products manufactured by 50% by 2050.
- Support the European Commission’s initiative to plant an additional three billion trees by 2030<sup>1</sup>.

<sup>(1)</sup>CEPI, (2021): Contribution to 3 billion trees objective

The European pulp and paper industry produces bioproducts using renewable materials such as timber and recovered paper, 92% of which are sourced in Europe and certified as sustainable. In addition, 91% of the water used by member companies is returned to the environment in good condition. It is also the leading industrial sector in terms of bioenergy generation capacity and bioenergy consumption. The paper industry, with its traditional and new products, plays a key role in society, supplying products that are efficiently manufactured, fully recyclable and produced using renewable raw materials.

The term biorefinery is now used in the industry to refer to cellulose pulp production plants. The biorefinery concept is analogous to that of a petrochemical refinery, which produces a broad range of products and fuels using fossil resources. Biorefineries can produce numerous bioproducts and biofuels using renewable carbon sources and bioprocesses. There is a chemical derived from bioproducts that is equivalent to the chemical derived from oil.

A biorefinery’s economic competitiveness is based on the co-production of small volumes of high-value-added products together with the cellulose or biofuels. Biorefineries can process different types of biomass to generate energy and a wide variety of products and synthesis intermediates. There are two types of biorefinery facilities based on energy generation, including biofuel plants, and on the production of chemicals, which can also generate electricity or heat simultaneously.

A biorefinery can be a single unit, such as a plant that produces cellulose and paper and generates electricity and heat using by-products in the process, or a group of facilities processing by-products or waste from neighbouring facilities.

Different biorefinery concepts are currently being developed, some of which are highly complex. Biorefineries can produce numerous bioproducts and biofuels using renewable carbon sources and bioprocesses.

The European cellulose and paper industry has been among the most active in the bioeconomy, making fully renewable, recyclable products and generating bioenergy to replace fossil fuels. The development of biorefinery projects to obtain products in alternatives ways to the petroleum-based chemical approach is also under way. The industry is thus clearly committed to decarbonisation.

## 5.2.10 OUR GENETIC AND SILVICULTURE IMPROVEMENT PLAN



### KEY ASPECTS OF THE GENETIC AND SILVICULTURE IMPROVEMENT PLAN

- Application of the best technologies to achieve the highest quality timber and integration of forestry with natural systems.
- Selection of superior trees.
- Optimisation of land use by planting the most suitable species.
- Inclusion of new eucalyptus species with different timber qualities.

The plan was launched in 1994 with the aim of applying the best technologies to obtain the highest quality timber and integrate forestry with the protection of natural systems while allowing and encouraging forest grazing. The implementation of this plan has allowed a substantial increase in the timber's volume and morphological quality.

The plan began with the selection of superior *Eucalyptus Globulus*, obtained from different locations and with diverse characteristics. These trees show high adaptability and natural rusticity, the main advantage of which is higher productivity per surface unit.



Our strategy involves reforesting the most suitable areas with these superior trees and trees obtained from select seeds. Less suitable zones are planted with other more appropriate eucalyptus species so as to optimise land usage. In both cases, the best forestry techniques are applied to maximise productivity per surface unit and increase sustainable timber production.

Having established the general lines of action, the plans are adapted to each of the areas in which we have plantations.

In Argentina, the forestry business was diversified by bringing in other eucalyptus species with qualities that are suitable for timber and cellulose such as the *Eucalyptus Grandis Hill ex Maiden* and *Eucalyptus Dunnii*.

In Uruguay, a reforestation project began in 2005, planting Eucalyptus Globulus forests on very severely eroded soils, combined with silvopastoral activities.

This project also involves the absorption of CO<sub>2</sub> emissions through forest masses, which act as sinks for greenhouse gases. In order to calculate and monitor CO<sub>2</sub> removal as a result of this project, we previously developed a specific methodology approved by the United Nations under the name AR-ACM0001 (Afforestation and Reforestation of Degraded Land), which is now applied to other forestry projects not only in Uruguay but also in Brazil, Chile, China, India and the Democratic Republic of the Congo. It is the first consolidated methodology to be approved for the forestry industry. It was conducted in forest plantations in the departments of Canelones, Maldonado and Lavalleja, covering an area of 4,691 forest hectares in the initial phase. The project was validated in 2012 and 690,000 Verified Carbon Units (VCUs) were confirmed in 2018. One VCU represents one metric tonne of greenhouse gas emissions reduced or removed from the atmosphere.

Through this project, we are contributing to the SDGs and sustainable development in Uruguay, including the following environmental achievements:

CERTIFICATION OF CO<sub>2</sub> EMISSIONS REMOVAL AT OUR URUGUAYAN PLANTATIONS UNDER THE INTERNATIONAL VCS

**ECONOMIC BENEFIT**



4,691 ha

**ENVIRONMENTAL BENEFIT**



657,311 t CO<sub>2</sub> emissions absorbed



FSC-certified management systems

**SOCIAL BENEFITS**



Knowledge sharing with local communities



Contribution to our local communities by creating jobs

**6**

# **OUR CORPORATE GOVERNANCE**



## 6.1 OUR CORPORATE GOVERNANCE AT A GLANCE

### 2021 Milestones

- Adaptation and preparation of new policies, including the Director Selection and Board Diversity Policy, the Policy on the Use of the Whistleblower Channel and the Personal Data Protection Policy.
- Amendment of Articles 14 and 23 of Iberpapel's Bylaws to include simultaneous remote attendance at General Shareholders' Meetings and Board of Directors meetings through telematic means in order to adapt them to Law 5/2021 of 12 April amending the Spanish Companies Act, among other laws.
- Amendment of Articles 8 and 11 of Iberpapel's General Shareholders' Meeting Regulations to include simultaneous remote attendance by telematic means at the General Meeting.
- Reorganisation of the Audit Committee, the Appointments and Remuneration Committee and the Corporate Social Responsibility Committee.

### Future challenges

- Adapt the Bylaws, the General Meeting Regulations and the Board of Directors Regulations to Law 5/2021 of 12 April amending the Spanish Companies Act, among other legislation.
- Increase the involvement of the least represented gender.
- Prepare a responsible procurement policy.

### MAIN METRICS AND TRENDS FOR 2021 > Our performance in 2021

<b>94%</b> -3% vs. 2020	<b>10</b> -9% vs. 2020	<b>84.99%</b> +3.23% vs. 2020
% Code of Good Governance recommendations followed	Number of Board of Directors meetings	% attendance at the Annual General Meeting
<b>3</b> -40% vs. 2020	<b>0</b> = vs. 2020	<b>22%</b> -3% vs. 2020
New or updated policies	Reports received through the Whistleblower Channel	% women on the Board of Directors

## OUR MAIN CONTRIBUTION TO THE SDGS

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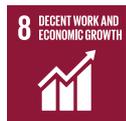


### GOAL 5.1 | GOAL 5.5

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End all forms of discrimination  
Ensure women's full participation and equal opportunities

Equality is a basic action principle. So all professionals are given the same opportunities to access employment and promotion, assuring the complete absence of any kind of discrimination during their activities, as laid down in the Group's Code of Conduct. Iberpapel also has a Director Selection and Board Diversity Policy addressing the diversity of knowledge, experience and gender.



### GOAL 8.5

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Achieve full employment and decent work

Iberpapel's pledge to provide decent, quality work is set out in our Code of Conduct, applicable in all the Group companies. The code includes commitments such as guaranteeing occupational health and safety and a pleasant work climate, promoting job stability through respect for the collective rights, and a work-life balance, among others.



### GOAL 13.1

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Strengthen resilience and adaptive capacity

The Iberpapel Group's Code of Conduct implements a number of conduct standards that include ethical, respectful relationships with customers, suppliers and authorities, in line with prevailing anti-corruption and anti-bribery legislation. There is also an Anti-Corruption Policy to prevent the risk of corruption, bribery and conflicts of interest.

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## 6.2 OUR COMMITMENT TO TRANSPARENCY

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The most complete details can be found in the Group's Corporate Governance Report, which is on Iberpapel's website in the section Shareholders and Investors.

We feel that good governance requires all our stakeholders to have access to regular information that is accurate, detailed, clear and useful.

In the interests of full transparency, all relevant information and communications are posted on the corporate website [www.iberpapel.es](http://www.iberpapel.es), together with corporate governance reports.

As a reflection of our belief in transparency, most of our policies can be consulted in the corporate governance section of the website in the section Shareholders and Investors/Corporate Governance.

This chapter contains a brief summary of the aspects of corporate governance most relevant to both the Group and its stakeholders.

## 6.3 SHARE CAPITAL STRUCTURE AND MARKET CAPITALISATION

The Iberpapel Group's share capital consists of 11,039,829 fully-subscribed and paid-up ordinary shares with a par value of 60 euro cents each, all in the same class and series, carrying the same voting and dividend rights, and represented by book entries.

The Group has a solid shareholder structure, there being no shareholding of 10% or more of share capital totalling €6,624 thousand at year-end 2021. Onchena is Iberpapel's principal shareholder, followed by Norges Bank, Miquel y Costas and Magallanes Value Investors.

### Shareholdings above 3% of capital (at 31 December 2021)

Shareholder's name or business name	% voting rights (direct)	% voting rights (indirect)	% total voting rights
	2021	2021	2021
ONCHENA	8.15%		8.15%
MIQUEL Y COSTAS & MIQUEL, S. A.		5.05%	5.05%
NORGES BANK	6.07%		6.07%
MAGALLANES VALUE INVESTORS, S.A., SGIIC		5.36%	5.36%
BOARD OF DIRECTORS			4.04%
TREASURY SHARES			1.41%
ESTIMATED FREE FLOAT			69.93%

Share capital includes a free float of 69.93%. All the parent company's shares are listed on the Madrid and Bilbao stock exchanges. At 31 December 2021, the Group's market capitalisation stood at €198.72 million.

### Treasury shares

In 2021, the Company acquired 94,444 treasury shares on the stock exchange. A total of €1,748 thousand was paid for the shares. In 2021, 66,479 treasury shares were sold for €1,550 thousand at a profit of €313 thousand.

At 31 December 2021, the Company held a total of 155,552 treasury shares at an original cost of €3,400 thousand. These shares represent 1.4096% of the Company's share capital. They are held as a treasury share portfolio, observing the limits stipulated in Article 509 of the Spanish Companies Act.

## 6.4 PRINCIPLES FOR SOCIALLY RESPONSIBLE GOVERNANCE

GRI: 102-19, 102-20, 102-21, 102-25, 102-26, 205-2

Our activity is guided by policies, principles and frameworks that instil a culture of business responsibility in everything we do. In 2021, we updated and extended our governance in various areas related to our non-financial performance to help us to handle the matters that most concern our stakeholders.

In 2021, the implementation of our comprehensive corporate governance improvement plan continued. We drew up new policies and developed existing approaches to align them with global and industry best practices, as well as with the Code of Good Governance in Listed Companies.

This included preparing and approving the Personal Data Protection Policy, which is to be the reference document on data protection, bringing together all the actions undertaken by the Company and any changes that may arise in the regulatory framework.

### Policies that inspire us and are integrated with our business strategy

- **General Code of Conduct:** This brings together the ethical values that must underlie our conduct as Iberpapel professionals and the guidelines and general lines of action for decision-making. It is a formal reflection of the Iberpapel Group's model of ethical management and regulatory compliance.
- **Corporate Social Responsibility Policy:** This lays down the fundamental, specific principles of Corporate Social Responsibility and of the Group's relationship with the local community. It also defines the commitments acquired voluntarily to build value for all stakeholders.
- **Criminal Compliance Manual:** This policy addresses the tools at the Group's disposal to prevent criminal risks relating to actions and conduct by our employees and people working in the Company.
- **Anti-Corruption Policy:** It reflects the instruments available to mitigate and prevent the risk of corruption, bribery and conflicts of interest. With these aims, it defines the set of guidelines, behaviours and best practices for employees in connection with the prevention of potential corrupt practices. Among other matters, this policy regulates conflict of interest management, behaviour guidelines relating to public officials and authorities, and private third parties, and the internal policy on personnel expenses and hospitality: gifts, commercial invitations and entertainment, among other aspects.
- **Climate Change Policy:** This policy presents and disseminates the Iberpapel Group's pledge to reduce the effects of climate change for both society and the Group itself.
- **Quality Policy:** This is the formal reflection of management's promise to implement a quality management system oriented towards customer service and continuous improvement.
- **Directors' Remuneration Policy:** This provides principles and criteria to bring the Remuneration Policy into line with market best practices and trends.
- **Communication Policy:** It encourages permanent contact and dialogue with all stakeholders, particularly shareholders, institutional investors and proxy advisors, transparent and accurate information being the Group's maxims in this area.
- **General Corporate Governance Policy:** It addresses all the governance actions and policies deployed by the Company (i.e. corporate governance system) and develops the principles applicable to the activities of the Company and the Group. This policy assures a transparent approach to good corporate governance by explaining how the measures are employed.
- **Risk Control and Management Policy:** This policy facilitates transparent communication of risks, determining the principles underlying the risk management system and establishing the roles and responsibilities of those involved in managing risks.
- **Economic-Financial and Corporate Information Communication Policy:** This policy helps to maximise the dissemination and quality of information made available to the market, investors and other stakeholders and must in turn be aligned with the policy on stakeholder relations.

- **Stakeholder Relations Policy:** It forms part of the Company's good corporate governance approach and complements the policies on communication and on corporate social responsibility. It guides and builds Iberpapel's relationships with our main stakeholders in all our activities and operations, by identifying expectations, assessing their main concerns and offering solutions that help to create shared value, thereby continuing to meet needs as they arise, instil trust and protect our corporate reputation.
- **General Meeting Attendance Premium Policy:** It is designed to maximise representation at General Meetings.
- **Internal Corporate Governance Rules:** Besides the policies that inspire our organisation, the Iberpapel Group has Corporate Governance regulations including:
  - Bylaws;
  - General Shareholders' Meeting Regulations;
  - Board of Directors and Board Committee Regulations;
  - Internal conduct rules for matters relating to securities markets;
  - Electronic Shareholder Forum Rules;
  - General Meeting distance-voting and delegation rules.



#### **POLICIES UPDATED AND PREPARED IN 2021**

- **Update of the Director Selection and Board Diversity Policy:** This Policy ensures that proposals for the appointment or re-appointment of directors are based on a prior analysis of the needs of the Board of Directors, as well as favouring diversity of knowledge, experience and gender on the Board, and was amended under Law 5/2021 of 12 April to include aspects such as the requirement that the Board must be formed exclusively by natural persons.
- **Update of the Policy on the Use of the Whistleblower Channel:** The Whistleblower Channel plays a key role in the effectiveness of our approach to compliance and criminal risk prevention, enabling the reporting of potential risks and breaches of existing legislation, as well as of internal operating policies. This policy was adapted to regulatory changes, particularly the new personal data protection regulations.
- **Approval of the Personal Data Protection Policy:** It encompasses all the actions that the Company has deployed from the viewpoint of data protection regulations, which have undergone many regulatory changes in recent years and reflect the basic principles and the rights of data subjects in this area.

## 6.5 THE IBERPAPEL GROUP'S CORPORATE GOVERNANCE SYSTEM

GRI: 102-18, 102-19, 102-20, 102-21, 102-22, 102-23, 102-24, 102-26, 102-28, 102-32, 102-35, 102-36

### INTRODUCTION

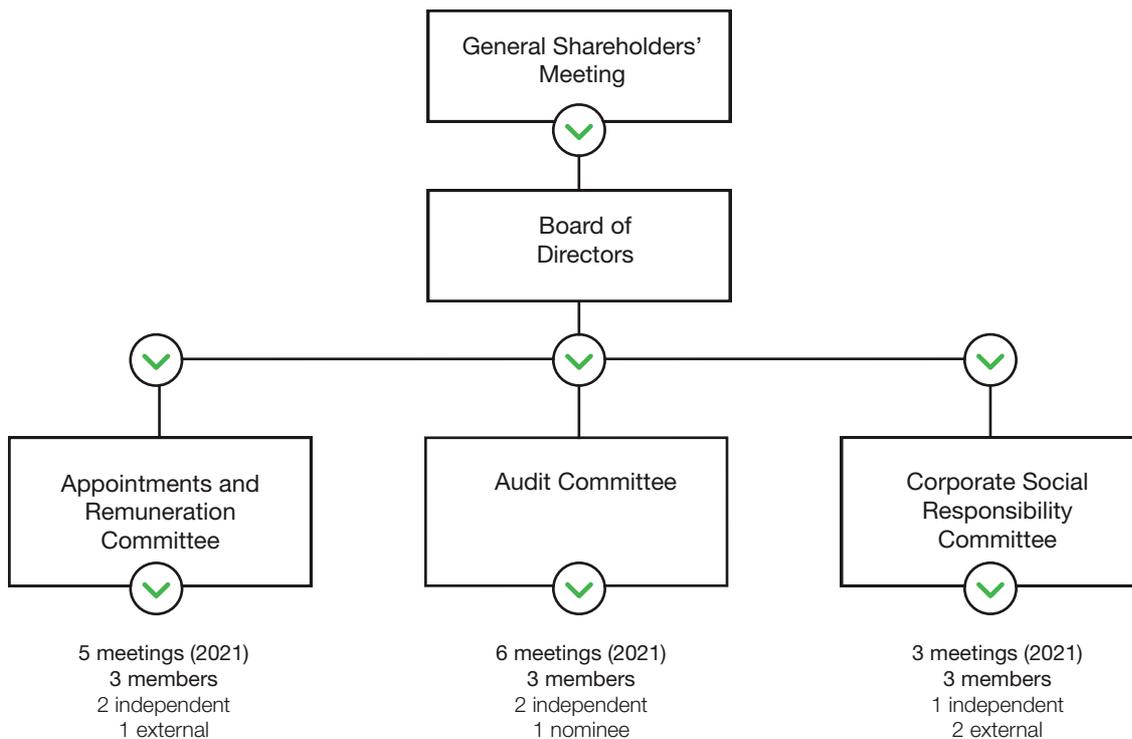
Iberpapel has put in place a Corporate Governance System comprising the Group's principles and values, the Bylaws, the corporate policies referred to previously and the internal rules of Corporate Governance, as well as all our internal codes and procedures.

Its content is inspired by and grounded in our belief in best practices in Good Governance, Corporate Social Responsibility and business ethics. The Group's reference framework is the Spanish National Security Market Commission (CNMV)'s "Unified Code of Good Governance in Listed Companies".

The Iberpapel Group's Corporate Governance System has two main governing bodies: the General Shareholders' Meeting and the Board of Directors, which have in turn set up three governing committees: the Appointments and Remuneration Committee, the Audit Committee and the Corporate Social Responsibility Committee.

The functions of these bodies reflect the provisions of Spanish legislation and the CNMV's rules and recommendations.

### The Iberpapel Group's Corporate Governance System



## PLEDGE TO CONTINUOUSLY IMPROVE OUR GOVERNANCE

Iberpapel has made a commitment to apply the highest standards of business ethics and the best practices in corporate governance. A tangible reflection of this commitment is our almost complete fulfilment (nearly 94%) of applicable Unified Code of Good Governance recommendations.

The Iberpapel Group oversees compliance with Good Corporate Governance recommendations and best practices, which entails the continuous review and update of related regulations and procedures.

In 2021, the only recommendations not followed by the Group were no. 7 “The Company should broadcast the General Shareholders’ Meeting live on its website” and a part of no. 15 “... women directors should account for at least 40% of the Board members by the end of 2022 and thereafter and, previously, not less than 30%”; no. 53 “...it should comprise solely non-executive directors, the majority of whom should be independent...”; and no. 64 “Payments for termination or expiry of the contract should not exceed an amount equivalent to two years of the total annual remuneration”.

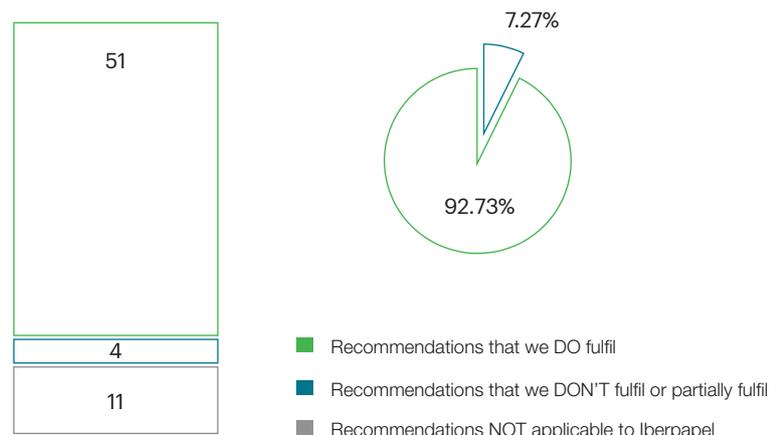
As regards no. 7, the Company does not consider the live broadcast of the 2021 Annual General Meeting on its website to be suitable, for organisational reasons and in view of the high level of shareholder attendance at the meetings held, whether in person or through representatives (82.32% in 2020 and 84.99% in 2021).<sup>1</sup>

As regards no. 15, although the maximum number of Board members was increased in 2020 to include a woman director, we hope to be able to take further steps in 2022 to continue increasing the percentage of women on the Board.

With regard to no. 53, it should be noted that all the committees are made up exclusively of non-executive directors, with a majority of independent directors on the Appointments and Remuneration Committee and the Audit Committee, although only 33.3% of the Corporate Social Responsibility Committee members have been independent directors since December 2021.

In relation to no. 64 states, our executive directors’ senior management contracts state that in the event of termination they will receive compensation equivalent to the maximum levels established in the labour legislation in force on the contract signing date, which is therefore equivalent to a termination benefit due to unfair dismissal under an ordinary employment contract.

### Compliance with Unified Code of Good Governance recommendations



<sup>1</sup> Further information on the CNMV's Code of Good Governance is available through this link: [https://www.cnmv.es/DocPortal/Publicaciones/CodigoGov/Codigo\\_buen\\_gobierno.pdf](https://www.cnmv.es/DocPortal/Publicaciones/CodigoGov/Codigo_buen_gobierno.pdf)

## A. GENERAL SHAREHOLDERS' MEETING

The General Meeting, duly assembled as stipulated in the Bylaws, the General Shareholders' Meeting Regulations and prevailing regulations, represents all the shareholders and is the Company's ultimate decision-making authority. Resolutions adopted are mandatory for all shareholders, including those who do not attend the meeting, abstain from voting or dissent, without affecting the rights and actions of all kinds to which they may be entitled by law.

### A.1 General Meeting functions and remit

The General Meeting decides on matters within its remit in accordance with Spanish Law and the Company's Bylaws, as well as the General Meeting Regulations. In particular, it may adopt the following resolutions:

- Appointment and removal of the Board directors, liquidators and, if applicable, auditors, as well as actions for liability against any of them.
- Approval, if applicable, of the annual accounts, distribution of results and management of the Company's affairs.
- Issuance of debentures and capital increases and reductions, delegating to the Board of Directors, if appropriate and within the legally stipulated periods, the power to set the execution date(s); the Board may use all or part of such powers, or even refrain from execution based on market circumstances, the Company's own situation or any fact or event of particular relevance that justifies such a decision, at the Board's discretion. In this case, the decision will be explained to the first General Meeting held following the end of the execution period. The power to increase share capital in the terms stipulated by Law may also be delegated to the Board of Directors.
- Approval of the final liquidation balance sheet.
- Amendment of the Company's Bylaws and confirmation or rectification of the interpretation afforded to the Bylaws by the Board of Directors.
- Dissolution, transformation, merger, spin-off and assignment of all the Company's assets and liabilities; transfer of the Company's registered office abroad.
- Approval of Specific General Meeting Regulations and subsequent amendments.
- Decisions on any matter submitted to it by the Board of Directors, in the event of relevant circumstances or events affecting the Company, its shareholders or its governing bodies and, in any case, in the event of a takeover bid on shares issued by the Company, where the Board of Directors' report is not favourable.
- Granting of powers to the Board of Directors for unforeseen cases, as deemed fit.
- Approval of the acquisition, disposal or contribution to another company of essential assets. An asset is presumed to be essential when the amount of the transaction exceeds twenty-five percent of the value of the assets reflected in the latest balance sheet approved.
- Approval of the transfer to subsidiaries of essential activities performed up to that time by the Company, even though the Company retains full ownership. Activities are presumed to be essential when the volume exceeds twenty-five percent of the total assets reflected in the balance sheet.
- Approval of transactions the effect of which is equivalent to the liquidation of the Company.
- Approval of the directors' remuneration policy as stipulated by Law.
- Any other matters that may be determined by Law or the Bylaws.

### A.2 Resolutions adopted in 2021

The full text of the resolutions adopted by the 2021 Annual General Meeting and the outcome of the relevant votes are available in Iberpapel's corporate website.

The resolutions adopted refer specifically to:

- In the first agenda item, the approval of the Annual Accounts and Management Report of both Iberpapel Gestión, S.A. and its Consolidated Group for the financial year ended 31 December 2020.
- In the second item, the reappointment of the Auditor of the Company and its Consolidated Group for 2021.
- In the third item, the approval of the amendment of Articles 14 and 23 of the Bylaws to include simultaneous remote attendance at the General Shareholders' Meeting through telematic means and the possibility of holding Board meetings attended simultaneously in different locations connected through audiovisual means or over the telephone.
- In the fourth item, the approval of the amendment of Articles 8 and 11 of the General Shareholders' Meeting Regulations to adjust the formal requirements that must be fulfilled when announcing General Meetings and to include the possibility of remote attendance at General Meetings through electronic or telematic means.
- In the fifth item, the ratification and appointment of Fermín Urtasun Erró as an executive director and member of the Board of Directors.
- In the sixth item, the approval, if appropriate, of the Directors' Remuneration Policy, for the purposes of Article 529.19 of the Consolidated Text of the Spanish Companies Act.
- In the seventh item, the consultative vote on the Annual Report on Directors' Remuneration, regulated by Article 541.4 of the Spanish Companies Act.
- In the eighth item, the report on the amendments made to the Board of Directors' Regulations since the last General Meeting, which will not be put to a vote.
- In the ninth item, powers were delegated to formalise, interpret, correct and execute the resolutions adopted by the General Shareholders' Meeting.
- In the tenth and final item, scrutineers were appointed to approve the Minutes of the Meeting.

### A.3 Our investor relations, transparency and engagement

Our investor relations are defined in the Communication Policy, the aim being to foster permanent contacts and dialogue with shareholders, institutional investors and proxy advisors while fully observing all market abuse regulations and assuring the similar treatment of shareholders in the same position, in a framework of transparency and trust, as well as in the Stakeholder Relations Policy, which promotes transparent activities that create value for stakeholders while assuring a smooth, ongoing dialogue.

This all forms part of one of the Group's main pledges to guarantee shareholders' right to information and to encourage maximum engagement. Some of the key mechanisms to achieve this, besides the policies, are as follows:

- Implementation of the electronic voting system in the General Meeting;
- Posting on the corporate website of all the General Meeting information;
- Development and roll-out of the electronic forum;
- Disclosure of facts and information relevant to shareholders and investors;
- Creation of the "investor agenda" containing the most significant events;
- Email contact point through [atencion.al.accionista@iberpapel.es](mailto:atencion.al.accionista@iberpapel.es).

## B. BOARD OF DIRECTORS

The Board of Directors is the body responsible for governance, general oversight and representation of the Group in relations with third parties, and is ultimately in charge of maximising business value in a sustainable way, in the interests of the Company and its shareholders, taking into account and observing the ethical duties instilled in Iberpapel's culture.

Its functions are carried out in unity of purpose and independence, responsibility, transparency and effectiveness, affording the same treatment to all shareholders and acting in the Company's interests so as to maximise the value of the business.

In 2021, the Board of Directors held ten meetings, all attended by the Chairman. Nine meetings were attended by all the directors, in person or through representatives following specific instructions. 98.89% of votes were cast by directors attending in person or through representatives following specific instructions.

### B.1 Director selection and re-appointment system and Board composition

The system for selecting and reappointing members of Iberpapel's Board of Directors is a formal, transparent procedure regulated by the Bylaws and the Board of Directors Regulations.

The Group also has a Director Selection Policy, which assures that proposed appointments or reappointments of directors are based on a prior analysis of the Board of Directors' needs and that they favour diversity of knowledge, experience and gender.

All of the directors are appointed by the General Meeting, following a proposal by the Appointments and Remuneration Committee, in the case of independent directors, a committee report in the case of all other directors, and a Board report in both cases. The Regulations state that the Board must include a reasonable number of independent directors and should have a majority of non-executive directors.

As regards composition, in accordance with the Bylaws and the Board's own regulations, so as to facilitate decision-making, guarantee gender diversity and meet business needs, this body has a minimum of three and a maximum of nine members designated by the General Meeting for a maximum of four years followed by possible reappointment for one or more four-year periods.

## Composition of the Board of Directors (31.12.2021)

### Iñigo Echevarría Canales

Board director category: Executive director

Position in the Company: Board Chair and CEO

Date first appointed: 21.07.1997 | Date last appointed: 25.04.2019

Committee membership:

### Néstor Basterra Larroude

Board director category: External director

Position in the Company: Vice-Chair

Date first appointed: 21.10.1997

Date last appointed: 25.04.2019

Committee membership: Corporate Social Responsibility Committee

### Iñaki Martínez Peñalba

Board director category: Independent external director

Position in the Company: Independent coordinator

Date first appointed: 21.06.2012 | Date last appointed: 24.04.2018

Committee membership: Audit Committee / Appointments and Remuneration Committee

### Martín González del Valle Chavarri

Board director category: External director

Position in the Company: Board director

Date first appointed: 28.06.2005 | Date last appointed: 25.04.2019

Committee membership: Appointments and Remuneration Committee

### María Luisa Guibert Ucin

Board director category: External director

Position in the Company: Board director

Date first appointed: 24.06.2010

Date last appointed: 23.06.2020

Committee membership: Corporate Social Responsibility Committee

### Rosa María Sanz García

Board director category: Independent external director

Position in the Company: Board director

Date first appointed: 23.06.2020 | Date last appointed: 23.06.2020

Committee membership: Appointments and Remuneration Committee / Audit Committee

### Jesús Alberdi Areizaga

Board director category: Independent external director

Position in the Company: Board director

Date first appointed: 22.05.2014 | Date last appointed: 23.06.2020

Committee membership: Corporate Social Responsibility Committee

### Iñaki Usandizaga Aranzadi

Board director category: External nominee director <sup>(\*)</sup>

Position in the Company: Board director

Date first appointed: 21.10.1997 | Date last appointed: 25.04.2019

Committee membership: Audit Committee

### Fermín Urtasun Erro

Board director category: Executive director

Position in the Company: Board director

Date first appointed: 25.02.2021 | Date last appointed: 25.02.2021

Committee membership:

Note: Full details of the directors' profiles may be found in the following link to Iberpapel's website: <http://www.iberpapel.es/consejo-de-administracion>.

<sup>(\*)</sup> The Board evaluated both his personal interest and his family group interest in the share capital, as well as his legal knowledge.

## B.2 Secretary to the Board of Directors

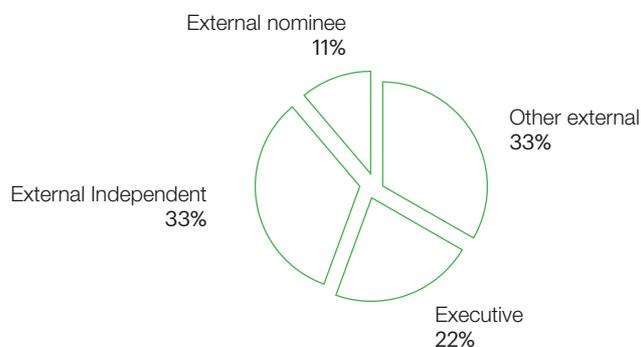
The non-voting Secretary to the Board is Oscar Rivero de Beer. His duties include assisting the Chairman so that the Board directors receive the relevant information to perform their duties sufficiently in advance and in an appropriate format

## B.3 Board of Directors functions and remit

The approval in a plenary meeting of the Group's general policies and strategies is reserved for the Board, in particular:

- Supervision of the effective functioning of the committees created and the activities of any designated delegate bodies and executives.
- Determination of the Company's general policies and strategies.
- Its own organisation and functioning.
- Issuance and submission to the General Meeting of the annual accounts.
- Appointment and removal of CEOs and stipulation of their contractual terms.
- Decisions relating to directors' remuneration, within the framework stipulated in the Bylaws and, if applicable, the remuneration policy approved by the General Meeting.
- Calling of the General Shareholders' Meeting and preparation of the agenda and resolution proposals.
- Treasury share policy.
- Approval of the strategic or business plan, management objectives and annual budgets, the Investment and Funding Policy, the Corporate Social Responsibility Policy and the Dividend Policy, the treasury share portfolio and, in particular, applicable limits.
- Determination of the Risk Control and Management Policy, including tax matters, and supervision of the internal information and control systems.
- Determination of the Corporate Governance Policy of the Company and the Group parented by the Company, its organisation and functioning and, in particular, the approval of its own regulations.
- Definition of the Company's tax strategy.

### Composition of the Board of Directors (figures at 31/12/2021)



### B.4 Gender diversity on the Board of Directors

Iberpapel believes in being a diverse, inclusive organisation. This commitment is reflected in our workforce and also extends to our governing bodies.

With this aim, the Group has a Director Selection and Board Diversity Policy that was approved by the Board on 20 December 2017 and amended on 30 November 2021. The policy is designed to assure that director appointment or reappointment proposals favour the diversity of gender, experience, knowledge and competencies and, in general, include no implicit bias that could entail discrimination of any kind and, in particular, facilitate the selection of women Board directors.

In the latter case, care will be taken to ensure that director selection procedures promote gender diversity, prohibiting any implicit bias that could cause discrimination in the appointment of women directors, the aim being to promote the inclusion of the less represented gender.

#### Members of the Board of Directors (figures at 31/12/2021)

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## C. APPOINTMENTS AND REMUNERATION COMMITTEE

The Appointments and Remuneration Committee is the body that assists the Board in matters related to directors' remuneration, appointments and appraisals. It is formed by a minimum of three and a maximum of five non-executive directors and a majority must be independent directors. The committee chairperson must be an independent director designated by the committee members. The secretary to the Board of Directors is the committee secretary, entitled to speak but not to vote.

This committee met five times in 2021 to carry out its main functions, i.e. supervision of the re-appointment of Board directors and definition and oversight of their remuneration. All the meetings were called by the committee chair.

The committee's regulations are set out in the Group's Bylaws (Article 24) and in the Board of Directors' Regulations (Article 10). Both documents are available for consultation in Iberpapel's corporate website.

### C.1 Composition of the Appointments and Remuneration Committee

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#### **Iñaki Martínez Peñalba**

Office: Chair

Category: Independent

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#### **Rosa María Sanz García**

Office: Board director

Category: Independent

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#### **Martín M<sup>a</sup> González del Valle Chavarri**

Office: Director

Category: Other external director

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### C.2 Appointments and Remuneration Committee functions and remit

The main functions of the Appointments and Remuneration Committee are as follows:

- Evaluate and propose to the Board of Directors the evaluation of the necessary competencies, knowledge, diversity and experience of the members of the Board of Directors and key Company personnel.
- Propose to the Board of Directors the appointment of independent directors for designation by co-optation or for submission to the General Shareholders' Meeting, as well as proposals for the reappointment or removal of such directors by the General Meeting.
- Report the proposed appointments of other directors to be appointed by co-optation or by submission to the General Meeting, as well as proposals for the reappointment or removal of such directors by the General Meeting.
- Report to the Board on gender diversity matters, ensuring that member selection procedures favour the diversity of experience and knowledge and facilitate the selection of female members; establish a representation target for the gender that is less represented on the Board of Directors and prepare guidelines to achieve that target.

Oversee and control the proper functioning of the Company's corporate governance system applicable to the matters within the committee's remit, making improvement proposals as deemed necessary.

- Oversee the independent directors' independence.

- Report, prior to approval, on the Company's Annual Corporate Governance Report, in relation to the report sections within its remit.
- Prepare decisions relating to remuneration; in particular, report, regularly review and propose to the Board of Directors on the remuneration policy, the system and amount of annual remuneration for Board directors and senior managers, and the individual remuneration of the executive directors and senior managers, as well as other terms and conditions of their contracts, particularly economic terms. For the purpose of the Board Regulations, senior managers are understood to be the general managers or those that carry out senior management functions reporting directly to the Board, Executive Committees or the CEO and, in any event, the Company's internal auditor.
- The Committee must perform its functions independently and, besides the functions attributed by the Law, it must ensure that the independence of the external advice provided to the committee is not undermined by conflicts of interest.

### C.3 Activities of the Appointments and Remuneration Committee

In 2021, the Appointments and Remuneration Committee was responsible, among other matters, for assessing its own functioning, the chairperson's performance, the achievement of objectives and the effectiveness of the meetings held. The committee analysed the Board's structure, size and composition and defined the process for assessing the Board Chairman's performance. The committee also reported favourably on proposals to appoint directors and submitted reports and proposals to the Board on the system and amount of annual remuneration for Board directors and senior managers, and the individual remuneration of the executive directors and senior managers, as well as other terms and conditions of their contracts. It also approved the certain proposed amendments to the Board of Directors Regulations to adapt them to the amendments of the Code of Good Governance, drew up a report proposing the directors' remuneration policy and prepared a proposal to amend the Director Selection and Board Diversity Policy.

A new director selection process began in 2021 leading to the appointment of Fermín Urtasun Erro. The committee previously reported on the appointment of this executive director.

The Appointments and Remuneration Committee prepares an annual activity report that is made available to all Iberpapel's stakeholders in the corporate website.

## D. AUDIT COMMITTEE

The Audit Committee is formed by a minimum of two and a maximum of four directors, at least two of whom must be independent directors and the members, particularly the Chair, must be appointed on the basis of his/her knowledge and experience in accounting and auditing, or both.

The Audit Committee held six meetings during the 2021 financial year that were attended, when required, by the Chairman of the Company's Board and by the Finance Director (in the case of meetings with the external and internal auditors). Attendance by members of the senior management team ensures that the committee is well informed on the matters falling within its scope.

The committee's regulations are set out in the Company's Bylaws (Article 24) and in the Board of Directors' Regulations (Article 10). Both documents are available for consultation in Iberpapel's corporate website.

### D.1 Composition of the Audit Committee

#### **Iñaki Martínez Peñalba**

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Office: Chair

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Category: Independent

#### **Rosa María Sanz García**

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Office: Director

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Category: Independent

#### **Iñaki Usandizaga Aranzadi**

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Office: Director

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Category: Nominee

### D.2 Audit Committee functions and remit

Without affecting the other functions attributed to it by the Law or the Bylaws, or any others that may be assigned by the Board of Directors, the Audit Committee has the following minimum basic duties:

- Report matters raised by committee members, within its remit, to the General Meeting.
- Submit to the Board proposals for the selection, appointment, re-appointment and replacement of the external auditor, pursuant to applicable legislation; define the auditor's terms of engagement and obtain regular information from the auditor on the audit plan and execution, while assuring independence in the performance of the committee's functions.
- Oversee and assess the preparation and completeness of financial and non-financial information, as well as the financial and non-financial risk control and management systems pertaining to the Company and, if applicable, the Group, including operating, technological, legal, social, environmental, political, reputational or corruption-related risks (it being possible for the technological, legal, social, environmental, political and reputational risks to be overseen on an alternative or complementary basis by the Corporate Social Responsibility Committee), reviewing regulatory compliance, the proper definition of the consolidation scope, the correct application of accounting policies and the internal audit unit, as well as discussing with the auditors any significant weaknesses identified in the internal control system during the audit and, in particular:
  - 1 Propose the selection, appointment, re-appointment and removal of the head of internal audit;
  - 2 Approve the annual internal audit work plan for the ICFR assessment and receive regular reports on the work carried out (including incidents and scope limitations), findings, follow-up of recommendations (including an activity report) and the action plan to correct the weaknesses observed;

3. Oversee the independence and effectiveness of the internal audit function;
  4. Propose the budget for that service;
  5. As part of the annual internal audit work plan, assure that the activity is focused mainly on the relevant risks (including reputational risks);
  6. Receive periodic information on the activities carried out;
  7. Receive information on operations related to structural and corporate changes the Company plans to undertake; and
  8. Check that senior management takes into account reported findings and recommendations.
- Become familiar with the internal control systems. In particular, the Audit Committee must oversee:
    1. The suitability and practical application of control policies and procedures in place;
    2. The preparation and integrity of financial information on the Company and the Group, ensuring the proper design of the ICFR system, fulfilment of regulatory requirements, adequate definition of the consolidation scope, taking into consideration, among other aspects, the possible existence of complex corporate structures or special-purpose entities, the correct application of accounting policies, etc.;
    3. Review, analyse and comment on the financial statements and other relevant financial information with senior management and internal and external auditors, so as to confirm that the information is reliable, understandable and relevant, and that accounting policies applied are consistent with prior-year policies;
    4. Review internal control and risk management systems so that the main risks are adequately identified, managed and reported;
    5. Act as a communication channel between the Board and the auditor, oversee the findings of each audit and the management team's response to recommendations, and mediate in the event of discrepancies between the auditor and the management team in connection with the principles and policies applied during the preparation of the financial statements. Specifically, the committee must ensure that the accounts finally issued by the Board are presented to the General Meeting without reservations or qualifications in the audit report;
    6. Supervise compliance with the auditor's contract, seeking to ensure that the opinion on the annual accounts and the main content of the audit report are drawn up clearly and accurately;
    7. Oversee auditor independence, paying attention to circumstances or matters that could threaten independence and any other matters related to the auditing process; receive information and communicate with the auditor as stipulated in audit legislation and technical auditing standards. Specifically, verify the amount of fees paid for all items as a percentage of the audit firm's total revenue, and the period during which the partner responsible for the audit team has been providing the Company with services.
  - Establish the relevant relationships with the external auditor in order to receive information on any issues that may jeopardise their independence, for review by the Audit Committee, and any other issues related to the audit, as well as any notifications provided under auditing legislation and technical auditing standards.
  - In any event, the committee must obtain an annual declaration of independence from the external auditor with respect to the Company or entities related directly or indirectly to it, as well as information on additional services of any kind provided and the relevant fees received from such entities by the external auditor, or by persons or entities related to the auditor, pursuant to audit legislation.
  - Issue annually, prior to the issuance of the audit report on the accounts, a report expressing an opinion on the independence of the auditors.
  - This report must, in any event, contain an assessment of the provision of the additional services referred to in the previous point, addressed individually and as a whole, other than the statutory audit and in connection with the independence regime or with audit regulations.

- Report, previously, to the Board of Directors on all the matters envisaged in the Law, the Bylaws and the Board Regulations, particularly on:
  - 1 The financial information that the Company must publish periodically;
  - 2 The creation or acquisition of interests in special-purpose entities or entities domiciled in countries or territories classed as tax havens; and
  - 3 Transactions with related parties.

### D.3 Activities of the Audit Committee

In 2021, the Audit Committee was responsible for reporting favourably on the 2020 Annual Accounts and for supervising the effectiveness of the Company's internal control and audit and risk management systems.

#### D.3.1. Financial accounting information

In the meeting of 25 February 2021, the committee reported favourably on the financial statements at 31 December 2020, prior to approval by the Board, the market announcement and reporting to supervisory bodies.

As regards the individual and consolidated annual accounts and management report for 2020, which were submitted to the Annual General Meeting for approval in June 2021, the committee reviewed and reported favourably in the meeting of 25 February 2021 before the reports were authorised for issue by the Board on 25 February 2021.

#### D.3.2. External auditor

In the meeting held on 25 February 2021, the committee proposed the reappointment of the auditor PricewaterhouseCoopers Auditores, S.L. to audit the individual and consolidated annual accounts for the financial year ended 31 December 2021.

The Board of Directors agreed to submit the proposal to the Annual General Meeting held in 2021, when it was approved.

The committee is in constant contact with the external auditor through its attendance at committee meetings. During the meetings held in 2021, the committee analysed and approved the external audit plan for 2021, relating to both Iberpapel Gestión and the companies of the Consolidated Group. Status and trends were analysed regularly and the committee also approved the 2021 external audit budget for the Company and the Group.

#### D.3.3. Internal audit

On 20 December 2007, the Board of Directors agreed to entrust Deloitte with the review of the Iberpapel Group's internal control system.

In 2021, the head of the Internal Audit Unit, together with the external advisor Deloitte, carried out work on the following processes:

- Analysis of service subcontracting services or material procurement processes involving third parties for factory repair or maintenance, as well as account closing and consolidation, fixed assets and cogeneration. Recommendations identified in previous years were also followed up.
- Risk control: The Audit Committee was informed by Deloitte's representative (both in work sessions and in the committee meeting of 20 December 2021) of the Risk Map prepared by management in association with Deloitte. So the Iberpapel Group has assessed risks under the universal model, carrying out the reviews deemed necessary to update the risk map and calculating the impact of the risks, as well as follow-up actions and steps in each area.

#### D.3.4. Tax risk control manual

According to Article 529.14 of the Spanish Companies Act, the Audit Committee must “oversee the effectiveness of the Company’s internal control, internal audit and risk management systems, including tax aspects, and discuss with the auditor any significant weaknesses identified in the internal control system during the audit”. During the meeting on 19 December 2016, the Tax Risk Management and Control Policy was submitted to the committee for approval and Iberpapel’s management, assisted by external advisor PwC, designed the Group’s Tax Risk Management System. The purpose of this procedure is to lay down principles and guidelines to ensure that the Group’s tax risks that could affect the tax strategy and objectives are identified, assessed and managed systematically, in order to comply with the new requirements of the Spanish Companies Act and of stakeholders.

All the events identified and addressed in the committee meetings of 25 February 2021 and 20 December 2021 are assessed from a triple perspective: probability of occurrence, impact and level of preparation. Once probability of occurrence and impact have been evaluated to arrive at an overall tax risk assessment, the values obtained are input into the probability/impact matrix and the risk will be classed as limited, moderate, significant or high depending on the position in the matrix. The necessary controls are therefore in place and were applied during the year to assure the fulfilment of the Group’s tax strategy.

#### D.3.5. Annual Corporate Governance Report

In the meeting of 25 February 2021, the Audit Committee examined Iberpapel Gestión’s “Annual Corporate Governance Report” for 2020, for subsequent approval by the Board of Directors, with the following aims:

- Guarantee fulfilment of legal requirements as regards information transparency.
- Analyse the consistency of the information contained in this report with the Company’s internal regulations, the CNMV’s records and Iberpapel Gestión’s prior-year corporate governance reports.

#### D.3.6. European Single Electronic Format

In accordance with European Union Regulation 2019/815 of 17 December 2018, the Company has drawn up the financial statements using the European Single Electronic Format (ESEF), which entails labelling the financial statements (balance sheet, income statement, cash flow statement and statement of changes in equity). There are plans to extend this labelling to the other components of the notes to the accounts as from 2022.

#### D.3.7. Proposed policy changes

Following the latest amendment of the Spanish Companies Act through Law 5/2021 of 12 April, the committee agreed to propose changes to the Policy on the Use of the Whistleblower Channel for approval by the Board.

#### D.3.8. Related-party transactions

In 2021 and to the publication date of this report, the Audit Committee, performing its supervisory function, took the view that none of the members of the Board of Directors, nobody represented by a Board director, no company in which such persons are directors, senior managers or significant shareholders, or persons with whom arrangements have been made or that act through nominees, has completed related-party transactions forming part of the Company’s ordinary business but not on normal market terms or material to the Company and its Group, save for the transaction described in the Annual Corporate Governance Report relating to the director María Luisa Guibert Ucín, the chair of the company Algeposa Gestión Portuaria, S.L., which provided port services to Iberpapel’s subsidiary Papelera Guipuzcoana de Zicuñaga, S.A.U., the committee having already reported the transaction to be fair and reasonable from Iberpapel’s perspective.

The Audit Committee prepares an annual activity report that is made available to all Iberpapel’s stakeholders in the corporate website.

## E. CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

The Corporate Social Responsibility Committee was formed in 2017, mainly to manage non-financial aspects related to the Group's activities. The committee is formed by a minimum of three and a maximum of five Board directors designated by the Board of Directors, who may include external directors. The Board of Directors must designate a chairperson from among its members.

The committee met on three occasions in 2021 to promote the Company's corporate governance strategy, among other functions. All the meetings were called by the committee chair.

The committee's regulations are set out in the Group's Bylaws (Article 24) and in the Board of Directors' Regulations (Article 10). Both documents are available for consultation in Iberpapel's corporate website.

### E.1 Composition of the Corporate Social Responsibility Committee

#### Jesús Alberdi Areizaga

Office: Chair

Category: Independent

#### Néstor Basterra Larroude

Office: Director

Category: Other external director

#### María Luisa Guibert Ucin

Office: Director

Category: Other external director

### E.2 Corporate Social Responsibility Committee's functions and remit

Pursuant to Article 10.3 of the Board Regulations, the Committee's functions include:

- Periodically review social responsibility policies and propose changes or updates to the Board of Directors.
- Promote the Company's corporate governance strategy.
- Oversee compliance with legal requirements and corporate governance system standards.
- Examine, promote and guide the Company's corporate social responsibility actions and report them to the Board of Directors.
- Evaluate and review the Company's plans for the implementation of social responsibility policies, monitoring the degree of fulfilment.
- Assess the Group's corporate social responsibility status.
- Issue reports and carry out corporate social responsibility and sustainability activities also within the Committee's remit, under the corporate governance framework or requested by the Board of Directors or its Chairman.
- Analyse voluntary initiatives and documents containing recommendations relating to corporate social responsibility as they arise in the market.
- Prepare an annual activity report, which shall serve as a basis for the Board of Directors' evaluation, among other uses.
- Oversee compliance with the Group's Code of Conduct in Capital Markets and, in general, with its corporate governance rules.

- The Committee may review, in coordination with the Audit Committee (which shall be ultimately responsible for the supervision of risk control and management functions), the systems in place for the internal control and management of non-financial technological, legal, social, environmental, political and reputational risks.

### E.3. Corporate Social Responsibility Committee's activities

In 2021, the committee reported favourably on the Personal Data Protection Policy and recommended that the Board should approve it. According to the self-assessment process, the committee effectively carried out its Board advisory, reporting and proposal functions, within its remit, holding a suitable number of meetings for which sufficient, accurate documentation was furnished on the matters addressed and was suitably presented, boosting the quality of member deliberations and sound decision-making.

Finally, the Corporate Social Responsibility Committee was reorganised to bring in a new member, María Luisa Guibert Ucin.

The Corporate Social Responsibility Committee prepares an annual activity report that is made available to all Iberpapel's stakeholders in the corporate website.



## 6.6 OTHER RELEVANT CORPORATE GOVERNANCE MATTERS

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### A. REMUNERATION SCHEME

In the meeting of 25 February 2021, Iberpapel Gestión's Board of Directors agreed to propose to the Annual General Meeting the approval of the Remuneration Policy for 2021, 2022 and 2023, following a favourable report from the Appointments and Remuneration Committee. The proposal was approved in the meeting held on 29 June 2021 with an 89.431% favourable vote.

This new Directors' Remuneration Policy is founded on a set of principles and criteria that are reviewed periodically by the Appointments and Remuneration Committee and the Board of Directors so as to align the Remuneration Policy with market best practices and trends.

In particular, Iberpapel's Remuneration Policy is based on the following principles:

- Observe Good Corporate Governance practices, above all the Code of Good Governance in Listed Companies.
- Guarantee that the remuneration received by the Board directors is sufficient to attract and retain the profiles desired by the Company.
- Remunerate the dedication, qualification, responsibility and performance of the members of the Board of Directors appropriately, without undermining their independence and while protecting the Company's interests.
- Act in accordance with the current domestic and international circumstances, adapting to the actual remuneration situation of the undertakings that compete with the Company on a comparable basis.
- Encourage the Board members to hold shares in the Company so as to align their interests with those of our shareholders and so of the Company.
- Strike a suitable balance in the various aspects of the Remuneration Policy, reflecting market best practices.

A new remuneration policy for the members of the Company's Board of Directors will be proposed to the 2023 General Meeting for the periods 2024, 2025 and 2026.

#### A.1. Directors' remuneration

Iberpapel's Remuneration Policy is designed to reward the Board members for holding office in a manner that reflects their professional worth and experience, as well as their dedication and the responsibility taken on, avoiding the possibility that the remuneration might jeopardise their independence.

As stipulated in the Spanish Companies Act, the maximum remuneration they may receive for holding office is established, in this case €621 thousand.

Subject to this limit, the Board of Directors will determine each member's remuneration, taking into account functions and responsibilities, membership of committees, offices held and other objective circumstances deemed relevant.

According to this policy, directors' remuneration includes the following items (which are updated as stated in the Bylaws):

- 1 Fixed annual allowance of €52,235 for each Board director.
- 2 An additional fixed annual amount of €15,044 for performing functions or activities as members of the Audit Committee, the Appointments and Remuneration Committee and the Corporate Social Responsibility Committee. The committee chair will receive a fixed annual allowance of €20,059.

### A.2. Executive directors' remuneration

The Group's Remuneration Policy also addresses the remuneration to be received by the Board directors for carrying out executive duties, so as to assure fair treatment based on professional worth, dedication and responsibility; guarantee the transparency and objectivity of Executive Directors' remuneration, as a basic principle of the Company's Corporate Governance system; and implement remuneration that is appropriate and competitive in the Company's industry so as to attract, retain and motivate the most skilled and prestigious professionals.

This remuneration consists of a fixed part and a variable part established by applying the above-mentioned principles and criteria.

- **Fixed remuneration:** In addition to fixed remuneration as Board directors, the Executive Directors will receive fixed annual remuneration for the performance of executive functions.
- **Variable remuneration:** The Company's Executive Directors will be entitled to receive extraordinary variable remuneration when the Board, following a report from the Appointments and Remuneration Committee, considers it to be in the Company's best interests to incentivise and reward their performance in relation to the configuration, preparation, negotiation and execution of corporate operations that are critical to the Company's future. The objectives to be met by the beneficiaries of this variable remuneration may be supplemented by other parameters that measure long-term business performance.

### A.3. Remuneration received in 2021

In 2021, €1,357 thousand accrued to the members of the Board of Directors (€906 thousand in 2020), not including any applicable updates under the Remuneration Policy.

In the meeting of 26 October 2017, the Appointments and Remuneration Committee issued a favourable report on the non-salary variable remuneration (non-vesting bonus) of a maximum of €150,000 for the Chairman and Chief Executive Officer of Iberpapel Gestión, S.A. related to the completion of the Hernani investment project.

In the meetings of 26 October 2017 and 20 December 2017, the Appointments and Remuneration Committee reported favourably on the non-salary variable remuneration (non-vesting bonus) of a maximum of €150,000 for the Chairman and Chief Executive Officer of Iberpapel Gestión, S.A., which will vest over a three-year period and is tied to the execution of the Hernani project. Therefore, in relation to their involvement in the Hernani investment project (the renovation and modernisation of the current cellulose plant have been successfully completed), in the meeting of 26 November 2020 the Appointments and Remuneration Committee reported favourably on the payment of the relevant bonus, as extraordinary non-salary variable remuneration, to the Executive Chairman and Chief Executive Officer of Iberpapel Gestión, S.A., for a maximum of €75 thousand. However, in view of the Company's situation caused by Covid-19, the Board decided to delay payment until a subsequent decision was made by the Appointments and Remuneration Committee, which finally agreed to make payment in 2021.

Remuneration paid in 2021 to senior managers who are not Board directors amounted to €995 thousand (€1,436 thousand in 2020).

The Board of Directors and the members classed as senior managers, as stated in the 2021 Annual Corporate Governance Report, received no shares, stock options, advances or loans in the current year or in the previous year.

#### Average remuneration of directors and senior managers

Data in thousand euro	Men		Women	
	2021	2020	2021	2020
Executive directors	422	425	-	-
Non-executive directors	72	71	77	77
Senior managers	140	179	-	-

#### B. ALIGNMENT WITH BEST PRACTICES

The Board of Directors' current structure and the remuneration system defined in the Group's Bylaws (which is described at the start of this section) conform to the content of Recommendations 13, 57, 58 and 59 of the 2015 Unified Code of Good Governance in Listed Companies, as amended in June 2020.

#### C. RELATED-PARTY TRANSACTIONS

During 2021, the Iberpapel Group did not carry out any transactions with its directors or other related parties, besides those described in the Annual Accounts and Annual Corporate Governance Report.

## 6.7 ETHICAL FRAMEWORK AND REGULATORY COMPLIANCE

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GRI: 102-16, 102-17, 102-25, 103-2, 103-3, 205-2

Iberpapel has fully integrated ethics, transparency and responsible management into its daily affairs, as reflected in behaviour policies and principles applicable to the Group and to all the entities that come into contact with the Company.

### GENERAL CODE OF CONDUCT

With the aim of transmitting a firm commitment to good governance, social responsibility and respect for fundamental human and labour rights, the Group provides its employees and other stakeholders with the General Code of Conduct.

On 28 November 2019, the Board of Directors updated the General Code of Conduct to combine the two pre-existing codes.

The new code is intended to promote a professional, ethical and responsible commitment from the Iberpapel Group and all its professionals.

It lays down the values, principles and general guidelines for conduct that must be observed by all our employees in their daily professional activities, irrespective of their hierarchical level, geographic location or function.

Following the 2019 update, the General Code of Conduct also includes the bodies responsible for oversight, consultation and interpretation, as well as indicating the disclosure and communication channel.

### MANAGEMENT MECHANISMS: OVERSIGHT AND DISTRIBUTION OF THE GENERAL CODE OF CONDUCT; PROCEDURES AND POLICIES

Oversight of compliance with the Code is the responsibility of the Control and Monitoring Unit and the ICFR and Criminal Compliance Body, which report periodically to the administrative bodies on the level of fulfilment, weaknesses detected and proposed improvement actions.

- The same unit is in charge of communicating and distributing the Code among the Group's employees through the following means:
- Delivery of a copy to each employee.
- Posting of the Code on the website, as well as any additional communication plan deemed fit.

### WHISTLEBLOWER CHANNEL

Iberpapel has implemented a reporting process to serve as an effective mechanism so that, through everybody's involvement, irregularities may be detected that could jeopardise the Group and its employees. The overall purpose is to comply with the recommendations of the Unified Code of Good Governance in Listed Companies and those relating to the internal control over financial reporting (ICFR) system.

The employees and other persons subject to the Code are required to report the following irregularities to the control and oversight bodies through the relevant channels:

- I. Breaches of the Code of Conduct;
- II. Breaches of industry codes and guidelines;
- III. Other allegedly criminal acts (such as the use of confidential information, falsification of agreements, reports, fraud, etc.).

This communication is facilitated by means of a channel available to all our employees and a reporting procedure so that any employee, manager or director may raise the alert regarding an irregularity or crime.

The aim is for our employees to be able to report in an entirely confidential way to the Control and Monitoring Unit and to the ICFR and Criminal Compliance Body any infringements of the General Code of Conduct, the internal control over financial reporting system recommendations or the Criminal Risk Prevention Principles, as well as any conduct related to occupational and/or sexual harassment set out in Articles 173 and 184 of the Spanish Criminal Code.

Should a report be received through this channel, the procedures laid down in the Policy on the Use of the Whistleblower Channel (amended in 2021) will be followed so as to observe all confidentiality requirements from the moment the report is received, taking any actions necessary to verify the information and obtaining advice from the Legal Advisory Department or any other persons deemed necessary.

In any case, the Iberpapel Group prohibits any kind of reprisal or disciplinary measure against those subject to the Code who report in good faith any type of infringement or irregularity.

Our overall Training Plans include specific measures relating to the Whistleblower Channel and Policy, so as to assure that it is correctly distributed and applied, allowing our employees to obtain all information that may affect their work.

The Audit Committee is responsible for overseeing the Whistleblower Channel.

## **PREVENTION OF CORRUPTION AND CONFLICTS OF INTEREST**

Both the General Code of Conduct and the Whistleblower Channel, which include aspects related to anti-corruption, are an effective tool for detecting and responding, if applicable, to potential corrupt practices.

Thanks to a firm pledge to combat all kinds of corruption, in 2019 Iberpapel has an Anti-Corruption Policy defining the set of guidelines, behaviour and best practices for employees in connection with the prevention of potential corrupt practices.

Besides the additional controls stipulated in the most stringent legislation, this policy contains guidelines to mitigate and prevent the risk of corruption and bribery throughout the Group, such as:

- General conduct guidelines for the directors, representatives, employees and all other people providing services in the Iberpapel Group.
- General conduct rules relating to gifts, hospitality and personnel expenses.
- General conduct guidelines on other special expenses, such as charitable donations, sponsorships, patronage and political contributions.
- General conduct rules in relation to public officials and authorities.
- Control measures in place in the Group.
- Penalty measures in case of infringements.

Iberpapel is firmly committed to the prevention of money laundering and terrorist financing through the principles of transparency, integrity, objectivity, impartiality and legality.

Various mechanisms were activated during the year to prevent money laundering, including a section of the Whistleblower Channel. The goal is to provide all our employees with communication channels for queries or claims so the Group can identify and manage any actions related to money laundering and answer any doubts or queries.

## HUMAN RIGHTS

Iberpapel, as a socially responsible group, is firmly committed to compliance with human rights. The aim is to run the business in a sustainable way, complying with all prevailing labour legislation and observing related international principles and standards.

Respect for human rights is important to our stakeholders, employees and supply chain. Our commitment in this area is reflected in the General Code of Conduct, which addresses the duty to act in accordance with current laws governing different matters such as human rights and internationally accepted ethical standards.

Our Corporate Social Responsibility Policy also promotes our belief in human rights, as stipulated in the International Bill of Human Rights, the United Nations Global Compact, the action principles, the business recommendations published by the United Nations, the Organisation for Economic Cooperation and Development and the International Labour Organisation (ILO).

Iberpapel intends to extend this commitment throughout the value chain. So these matters are managed actively by creating work environments in which diversity and tolerance are maxims. We endeavour to minimise the risk of human rights infringements in the supply chain by assuring that the supply of raw material, particularly timber, in view of its importance to the process and the volume of purchases, takes place under dignified working conditions in line with the ILO's conventions.

The Group absolutely rejects all discrimination in the workplace, child labour, forced labour and work carried out under extremely difficult, inhumane or degrading conditions. We have pledged to respect freedom of association and collective bargaining wherever we do business.

In 2021, as in previous years, the first step was to purchase 99% of timber from custody chain certified suppliers, as in previous years. We can be sure that the timber acquired in our value chain is controlled by means of the EUTR (European Union Timber Regulation) Due Diligence System.

In 2021, as in previous years, no claims were received for human rights infringements.

## SITUATIONS THAT HAVE OCCURRED AND CORRECTIVE MEASURES

During 2021, there were no infringements of the General Code of Conduct or of any other nature, including discrimination.

Should they arise, the necessary measures will be implemented to effectively apply the Code, as well as the other internal rules and policies. The failure to observe the principles and values contained in the Code may lead to penalty measures, all in accordance with the disciplinary rules laid down in the Spanish Labour Statute and applicable collective bargaining agreements, without affecting any administrative or criminal penalties that may be imposed.

## IBERPAPEL GROUP'S GENERAL ETHICAL PRINCIPLES

In all their activities, our employees must be guided by ethical values defined in international commitments such as the International Bill of Human Rights, the core conventions of the International Labour Organisation (ILO) and the United Nations Global Compact, which the Group endorses, as well as compliance with applicable legislation.

The Iberpapel Group is fully committed to the following basic action principles so as to contribute to the United Nations Sustainable Development Goals:

### EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

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### RESPECT FOR EMPLOYEES

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### LIFE-WORK BALANCE, AS FAR AS POSSIBLE

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### COLLECTIVE RIGHTS

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### HEALTH AND SAFETY

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### ENVIRONMENTAL PROTECTION

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## 6.8 INTEGRATED RISK MANAGEMENT

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GRI: 102-15, 102-29, 102-30, 102-31

### INTRODUCTION

The Iberpapel Group has a global risk management and control system, integrated with the ordinary management systems, in order to assure the fulfilment of our strategy and objectives by controlling, identifying, assessing and managing to an optimal degree any risks that may affect the business in the short, medium and long term.

The Group has put in place the mechanisms necessary to control and manage risks in line with the universal assessment approach.

The Board of Directors lays down the general principles and guidelines of the risk management and control system, the acceptable risk level and the specific action guidelines to address and mitigate each risk category, including tax risks and the oversight of the internal information and control systems.

### RISK CONTROL AND MANAGEMENT

The Risk Control and Management Procedure describes the process for identifying, assessing and controlling the risks that are considered to be relevant in order to be able to fulfil the corporate strategy and objectives. Iberpapel is therefore able to guarantee that the Group's different levels of responsibility are aware of and assess the risks that threaten the organisation and that they are managed within pre-established acceptable risk levels.

As indicated in the Multi-Year Internal Audit Plan, a review of the accounts receivable, forestry management, sales and sales transport, and information system processes was carried out this year, in addition to the review of prior-year recommendations. This ensures that all the control activities in place in the organisation's main business cycles are formalised, documented and updated, and that the specific procedures required are implemented and up to date.

Iberpapel includes non-financial risks in the scope of monitoring, control and management, due both to the Company's commitment and to the potential impact they could have, while also anticipating possible future legislation.

### OVERSIGHT OF INTEGRATED RISK MANAGEMENT

The Board Regulations state that the Audit Committee is responsible for overseeing the internal audit functions, designating those responsible, checking the internal control and risk management systems, and approving tasks to be undertaken, as well as implementing plans and improvements proposed. The Board of Directors controls and manages risks based on an assessment of the risks overseen by the Audit Committee, in coordination with the Corporate Social Responsibility Committee, where applicable.

### CONTROL ENVIRONMENT AND RISK MANAGEMENT

Iberpapel has developed an internal control culture and prioritises a control environment in the organisation as the basis for all other aspects of internal control, through policies that help to monitor and manage risks. Iberpapel's Board of Directors takes direct charge of the most important tasks related to control in the organisation, such as:

- Design and review of the organisational structure.
- Definition of lines of responsibility and authority, including the suitable distribution of tasks and functions.
- Assurance that there are sufficient procedures to disseminate control processes across the Company.

The Board also has the necessary tools and procedures to define risk levels and types. So control activities that must be carried out at each level of the organisation to reduce risks are designed and implemented.

Depending on the risks, control actions designed can span different procedures. All controls are designed to prevent, detect, mitigate, offset and correct the potential impact of risks arising from the activity sufficiently in advance, assuring business sustainability and performance for stakeholders.

The Company considers an oversight system to be essential to ascertain the level of functioning and operability, in due time and form, of our internal control system, such that it is possible to apply the necessary measures in the event that the various controls designed are not working correctly. As many reviews as are deemed necessary are carried out to update the system. Depending on the type of activity, guidelines are designed for:

- Preventive controls that help to mitigate risk.
- Detective controls to locate risks that arise.
- Manual and/or automatic controls.
- These activities and procedures are communicated by senior management to ensure that they are understood by the relevant employees and applied correctly.

### INTERNAL OVERSIGHT PROCEDURE

Iberpapel has developed an internal oversight procedure within an integrated methodological framework for managing key risks in order to update the risk map, calculate the impact of each risk and implement follow-up and management actions in each of the areas mentioned.

Specifically, a process has been created to identify risks in internal control over financial reporting (ICFR) systems to allow a systematic process for the identification of risks and irregularities affecting financial information. The assessment of these risks enables the impact of potential events to be analysed, encompassing operations that are complex due to the high volume of transactions or the difficulty of the calculations, or are material from a quantitative or qualitative viewpoint. The assessment entails the classification of impact, frequency and theoretical risk parameters based on value.

An annual review is performed on the control objectives identified and the risks involved to achieve those goals.

### THE IBERPAPEL GROUP'S RISK MAP

In 2021, in line with prior years, we put in place the mechanisms required to control and manage risks by defining the risk taxonomy or catalogue and then assessing probability and impact. This system allows the continuous management of the risks affecting the Group so that it can adapt to changes, review objectives and strategies, and update its monitoring and oversight process.

#### Risk Control and Management Policy.

On 22 December 2020, following Good Governance Code recommendation no. 45, the Board of Directors approved a Risk Control and Management Policy identifying the different types of financial and non-financial risks, and establishing a risk control and management model defining the risk level deemed acceptable, measures to mitigate the impact of risks identified, should they arise, and the information and internal control systems that will be used to control and manage them.

#### Changes to the prior-year risk map

Changes to the 2020 risk map include the inclusion of the new "Energy stress" risk related to volatility in energy prices and supply, as well as the price of CO<sub>2</sub> emission allowances (high impact and high probability).

The reduction in the impact of "Long-term decline in demand" risk, increase in the impact and probability of "Talent" risk, rise in the impact of "Environmental compliance" risk, reduction in the impact and probability of "Short-term activity" risk and increase in probability of "Raw material stress" risk are worthy of note. Some risk definitions were also adjusted.

Since its beginnings, Iberpapel has been faithfully committed to the environment and the communities in which we operate, aware of the fundamental role we play in the local and social fabric, and fostering respect for the environment by setting targets to reduce the environmental impact associated with the entire business value chain.

The nature of the business means that Iberpapel must assess and, where appropriate, mitigate both the risks inherent in the transition to a low-emission economy and those related to the physical impacts of climate change.

Firstly, the risks of transition to a low-emission economy are related to the possible political, legal, technological and market changes that may occur in the medium to long term during the transition to a less fossil-fuel-dependent and lower greenhouse-gas-emitting economy. Of these transition risks, those with the greatest impact on the organisation have been identified, such as the following:

- Political and regulatory risks, i.e. risks arising from possible actions by political and regulatory bodies that seek either to limit the factors causing climate change or to promote measures to adapt to climate change, and which affect the company's business, such as requirements to switch to clean energy sources and requirements to cut greenhouse gas emissions resulting directly or indirectly from the company's activity. Closely related to these regulatory aspects, changes in general energy regulation could affect industrial power-generating companies, and there is also likely to be an increase in legal or litigation risks due to climate-related matters.
- Reputational risk, which is closely linked to society's demands due to increasing awareness, stimulated by Covid-19, of matters such as the environment, sustainability and good business practices, as well as how the market will reward undertakings perceived as leaders in the transformation and modernisation of the paper industry and will foreseeably punish companies that contribute in a less visible way to this transformation or are seen to be obsolete in ESG terms.
- Market risk, relating to changes in demand associated with digitalisation and to imbalances between supply and demand that may exert pressure on selling prices.
- Technology risk, which concerns the technological innovations and machinery that emerge or are favoured in the transition process, and the consequent replacement of the old with the new.

There are also physical risks related to events (acute risks) or long-term changes (chronic risks) resulting from climate change, such as natural disasters in the first case, or long-term changes in weather patterns in the second case. In view of the raw materials employed in the production process and Iberpapel's Forestry Division, fires are identified as a key acute risk. It should also be noted that forest masses act as carbon sinks, absorbing CO<sub>2</sub> each year, while Iberpapel's sustainable management reduces chronic risks.

Efforts to mitigate and adapt to climate change can also create opportunities for Iberpapel, which have been identified and are set out below:

- Improving our market positioning thanks to a better, more sustainable product design and an enhanced reputational image, aligned with the demands of a society that is increasingly aware of sustainability.
- Obtaining better financing conditions to implement sustainable projects, including significant interest rate cuts.
- Diversifying and broadening the spectrum of Company investors towards funds and investors that integrate sustainability and responsible business-related indicators in their investment criteria or through inclusion in sustainability-focused indices and portfolios.
- Global trend towards clean energy sources, entailing increased energy efficiency and lower costs.
- Seeking greater efficiency in the management of the Company's resources and waste so as to bring down operating costs.

With the aim of setting tangible objectives in the short and medium term to mitigate the risks and address the opportunities identified, the following areas have been defined:

GENERAL RISKS	SPECIFIC RISKS - DESCRIPTION	MAIN RISK MANAGEMENT ACTIONS
Governance	1. Reputational (the impact on stakeholder perceptions of the Company), mainly related to environmental, labour, ethics and integrity issues.	Iberpapel has technology, policies and procedures in place that mitigate the probability and gravity of events that could damage its reputation, and the executive team is aware of the importance of managing reputational risk.
Strategy and planning	2. "Price war" strategy due to market pressures.	Iberpapel mitigates these risks by maintaining a highly competitive cost structure that enables the impact of market crises to be absorbed comparatively better than its competitors. In view of the volatility of electricity, gas and CO <sub>2</sub> emission allowance prices, the Group continuously monitors market trends and applicable regulations so as to take any actions deemed appropriate.
	3. Long-term decline in demand due to digitalisation.	
	4. Tension in raw material markets.	
	5. Dependence on market trends when setting prices. Total dependence on market evolution to define prices, which complicates the use of a medium- and long-term planning tool.	
	6. Relevance of decision-making relating to growth and significant investments in the paper industry (machine-intensive). Given the significance of such strategic investments, the analysis of funding and monitoring of implementation is vital, even foreseeing a negative market scenario when the investment becomes operational.	
	7. Climate change. Anthropogenic climate change entails risks due to the direct effects of a changing climate and risks arising from new regulations and changing expectations.	
	8. Energy (and CO <sub>2</sub> ) price and supply tension. Volatility in energy price and supply, as well as in the price of CO <sub>2</sub> emission allowances.	
	Operational / structural	
10. Damage to property risk coverage due to the centralisation of the Group's production in a single location (Hernani plant).		
11. Cyberattacks. Threats to the Group's assets, operations and information related to IT security and the risk of fraud.		This type of risk is defined as threats to the Group's assets, operations and information related to IT security and the risk of fraud. The Iberpapel Group has made administrative improvements to technology so as to mitigate security risks and reduce service interruption. Iberpapel has also had cyber risk insurance coverage since 2018.

GENERAL RISKS	SPECIFIC RISKS - DESCRIPTION	MAIN RISK MANAGEMENT ACTIONS
Operational / structural	12. Talent attraction and retention.	Among other measures, Iberpapel oversees each professional's work, stimulates motivation and professional development, and pays competitive salaries, mobility among our employees being very low.
	13. Business performance in the short term tied to the recovery of the health situation and the economy.	Since the start of the Covid-19 health crisis, Iberpapel has taken appropriate steps to protect our employees while continuing to do business. We are also able to confront the situation thanks to our healthy financial situation.
Financial	14. Reliability of financial and non-financial information for third parties and for decision-making.	In order to assure financial information for decision-making and third parties, the Iberpapel Group has implemented an internal oversight procedure and a related "Internal Control over Financial Reporting (ICFR) and Criminal Compliance System Control and Monitoring Body", which reports to the Audit Committee.
	15. Financial solvency of customers in the current economic situation and impact on the sums insured.	The Iberpapel Group has a number of credit lines covering all paper sales. Our financial position is healthy, allowing us to confront financial tensions.
	16. Foreign exchange fluctuations (e.g. US dollar) causing changes to paper industry supply and demand that may be significant.	
	17. Global financial and political situation impacted by the pandemic.	
Compliance	18. Impact of regulatory amendments on industrial companies in general and power generators in particular.	The subsidiary PGZ has two operational power cogeneration plants, one using biomass (black liquor), which is included in the pulp manufacturing segment, and the other being a gas combined cycle plant. PGZ therefore monitors the vast volume of regulations that have been published since 2013.
	19. Compliance with environmental legislation and the necessary internal policies.	The Iberpapel Group has an environmental management system based on the international ISO 14.001 standard and certified by independent auditors, guaranteeing compliance with applicable, European, state and regional legislation. In order to comply with Law 26/2007 on Environmental Liability and Royal Decree 2090/2008 containing the implementing legislation, the Iberpapel Group carried out a timely analysis of environmental risks and monetised them by applying the Environmental Damage Index (IDM) and the Environmental Responsibility Offer Model (MORA). Finally, the Iberpapel Group is also proceeding with its reforestation policy, in which the voluntary carbon markets are an important tool.
	20. Compliance with health and safety regulations at each of our locations.	The industrial subsidiary PGZ has an Occupational Risk Prevention management system that complies with the ISO 45001:2018 standard certified by Det Norske Veritas (DNV). One of the basic pillars of this system is to keep our workers permanently up to date with work post risks and mandatory preventive measures, which is achieved by means of the Prosafety management software, accessible to all our workers. This is supplemented by a programme of continuous inspections of the facilities and safe behaviours, together with quarterly meetings of the Health and Safety Committee, a joint committee that addresses all matters related to our workers' health and safety. The Company also has an In-House Prevention Service covering the specialities Industrial Safety and Hygiene, and uses two External Prevention Services for the specialities Ergonomics, Psychosociology and Occupational Medicine. The Group's other subsidiaries have contracted an External Prevention Service for all specialities.
	21. Regulatory changes having a considerable impact on decisions in connection with investments to be made and related recoverability and return.	As indicated, Iberpapel mitigates these risks by maintaining a highly competitive cost structure that enables the impact of market crises to be absorbed comparatively better than its competitors.

### Criminal risks

During 2021, in order to comply with the regulatory requirements of section 31 (ii) of the Spanish Criminal Code, the Iberpapel Group's control bodies, that is the Control and Monitoring Unit specifically designated by the Board of Directors of PGZ and the ICFR System and Criminal Compliance Control Body specifically designated by the other Group subsidiaries, carried out the necessary oversight and monitoring tasks specified in the Group's criminal compliance model.

In 2021, these activities included:

- Review of the identification of the criminal risks to which the Group could potentially be exposed in view of its corporate objects and operations.
- Reassessment of the Group's criminal risk map so as to include the relevant adaptations and adjustments to reflect both criminal legislation and Iberpapel's operational and functional reality.
- Criminal risk training sessions for employees, middle management and executives.

### Tax risks

During 2016, the Company's Board of Directors, in response to a proposal by the Finance Department and to comply with Article 529.iii) of the Spanish Companies Act, designed the Iberpapel Group's tax strategy, defining the governing principles for the tax function of Iberpapel Gestión, S.A. and all the Group companies.

Since then, the Finance Department has maintained the Tax Risk Management System (SGRF), the purpose being to lay down principles and guidelines to ensure that tax risks that could affect the tax strategy and objectives are identified, assessed and managed systematically, in order to comply with the new requirements of the Spanish Companies Act.

The scope of the system encompasses all tax risks affecting activities and processes applicable to all taxes paid in Spain and by the subsidiaries abroad.



7

# OUR 2021 RESULTS



## 7.1 OUR RESULTS AT A GLANCE

### 2021 Milestones

- Specialty papers accounted for 30% of our product mix.
- Our solid financial position was further strengthened.

### Future challenges

- Consolidate diversification into specialty papers at around 30%.
- Sell short-fibre cellulose (bleached eucalyptus kraft pulp) to third parties.
- Keep up our efforts to bolster the Group's financial position.

### MAIN METRICS AND TRENDS FOR 2021 > Our performance in 2021

**€243.24 million**

+48.62% vs. 2020

Revenue (million €)

**€222.17 million**

+53.72% vs. 2020

Costs (million €)

**€21.07 million**

+10.13% vs. 2020

EBITDA (million €)

**€9.29 million**

+119.10% vs. 2020

Net profit (million €)

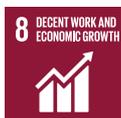
**7.81%**

6.54% vs. 2020

Return on Equity

Section "7.3.5 Main financial and management ratios" includes Iberpapel's most significant financial ratios and three-year trends.

### OUR MAIN CONTRIBUTION TO THE SDGS



#### GOAL 8.1 | GOAL8.2

Maintaining economic growth  
Increasing productivity through diversification, technology and innovation

Iberpapel's pledge to provide decent, quality work is set out in our Code of Conduct, applicable in all the Group companies. The code includes commitments such as guaranteeing occupational health and safety and a pleasant work climate, promoting job stability through respect for collective rights and a work-life balance, among other aspects.

## 7.2 SUMMARY OF IBERPAPEL'S BUSINESS CONTEXT

The significant rise in the price of energy due to increasing electricity, natural gas and oil prices, combined with strong cost inflation in other raw materials used in the production process, seriously impacted Spanish industry and therefore our paper subsidiary. Aggravating this complicated, exceptional situation of rising energy and raw material costs, our biomass turbine suffered a major breakdown in the final quarter of the year.

In the last quarter of the year, the Group launched corrective measures, including a publicity campaign for customers, explaining the seriousness of the situation and informing them of significant increases in the selling price of our products. Thanks to this measure, the average selling price of the Group's paper in 2021 reached 2020 levels but was still 6% to 7% lower than in 2018 and 2019.

## 7.3 MANAGEMENT RESULTS

GRI: 103-2, 103,3 201-1

Against this complicated backdrop of cost inflation, Iberpapel obtained a gross operating profit (EBITDA) of €21.07 million in the final quarter, 10.13% more than in 2020. The Group's net profit for 2021 rose 119% against 2020 up to €9.29 million.

Our financial highlights for the past three years are shown below to provide a more detailed analysis of Iberpapel's financial performance:

### Financial highlights

Million euro	2021	2020	2019	Change 20-21	Change 19-20	Comments
Revenue	243.24	163.66	218.34	48.63%	(25.04)%	The Group's revenue rose 49% in 2021 compared to 2020.
Costs	222.17	144.53	181.35	53.72%	(20.30)%	Costs increased by 54% against the previous year.
EBITDA	21.07	19.13	36.99	10.13%	(48.30)%	The Iberpapel Group's EBITDA rose 10%.
Net profit	9.29	4.24	21.68	119.10%	(80.44)%	Net profit reached €9.29 million.

**Income statement**

Besides the financial highlights, we provide below our other financial figures, in the interests of transparency, so that our stakeholders can gain a better understanding of our performance over the years:

**Income statement**

Million euro	2021	2020	2019	Change 20-21	Change 19-20
Net sales	237.23	152.88	213.47	55.17%	(28.38)%
Other income	6.01	10.78	4.87	(44.24)%	121.39%
Revenue	243.24	163.66	218.34	48.62%	(25.04)%
Changes in inventories of finished goods and work in progress	(6.65)	2.65	4.98	-	(47.03)%
Raw materials and consumables	(82.62)	(65.55)	(88.37)	26.75%	(25.82)%
Staff costs	(19.70)	(20.17)	(20.30)	(2.34)%	(0.63)%
Other expenses	(113.20)	(61.45)	(77.66)	84.21%	(20.87)%
<b>EBITDA</b>	<b>21.07</b>	<b>19.13</b>	<b>36.99</b>	<b>10.13%</b>	<b>(48.30)%</b>
Depreciation/amortisation	(13.30)	(10.81)	(10.70)	23.05%	0.95%
Impairment and profit/(loss) on fixed asset disposals	0.03	(1.65)	0.01	(101.88)%	20.512.5%
<b>EBIT</b>	<b>7.80</b>	<b>6.67</b>	<b>26.30</b>	<b>16.87%</b>	<b>(74.63)%</b>
Net financial income/(expense)	0.92	(1.57)	(0.17)	(158.46)%	803.44%
Profit before tax	8.72	5.10	26.13	70.91%	(80.47)%
Taxes	0.57	(0.86)	(4.45)	(166.43)%	(80.62)%
<b>NET PROFIT</b>	<b>9.29</b>	<b>4.24</b>	<b>21.68</b>	<b>119.10%</b>	<b>(80.44)%</b>

### 7.3.1 Revenue

Cumulative revenue at 31 December 2021 totalled €237 million, representing an increase of 55%. The Iberpapel Group's most significant revenue items are broken down below:

#### Revenue

Million euro	2021	2020	2019	Change 20-21	Change 19-20
Net sales	237.23	152.88	213.47	55.17%	(28.38)%
Paper sales	181.90	124.36	172.56	46.27%	(27.93)%
Electricity sales	51.44	27.08	38.64	89.96%	(29.91)%
Timber sales	3.89	1.44	2.27	170.14%	(36.40)%
Other income	6.01	10.78	4.87	(44.24)%	(121.39)%
Revenue (Net sales + Other income)	243.24	163.66	218.34	48.62%	(25.04)%

Revenue climbed 55% against the previous year. Paper, electricity and timber sales rose by 46%, 90% and 170%, respectively.

Electricity sold increased by 90% on the same period of the previous year, due essentially to the significant rise in the selling price.

Timber sales also climbed significantly after logging in both South America and Spain.

#### Sales of the main products (million euro)



### 7.3.2 Expenses

In 2021, staff costs were in line with previous years. Supply costs, including gas and electricity, were considerably higher than in 2020 due to cost inflation in both raw materials and energy (gas and electricity).

#### OPERATING EXPENSES

- **Raw materials and consumables:** In 2021, raw materials and consumables rose by over 26% against the previous year up to €82.62 million (as compared with €65.55 million in 2020) as a result of the complicated inflationary situation at the end of the year.
- **Staff costs:** The headcount at 31 December 2021 was 293, including senior management, which is four below 2020. Specifically, there were 297 employees in 2020. So staff costs remained very stable in relation to the previous year, falling slightly by 2.34% to €19.70 million (€20.17 million in 2020).

#### Operating expenses

<b>€82.62 million</b> +26.75% vs. 2020	<b>€19.70 million</b> -2.34 vs. 2020
Raw materials and consumables	Staff costs

#### OTHER EXPENSES

Expenditure on supplies of gas and electricity increased considerably to reach €69.27 million in 2021 (against €29.98 million in 2020).

Other taxes, including electricity tax, amounted to €2.19 million (€2.17 million in 2020).

Finally, CO<sub>2</sub> allowances consumed during the year totalled €12.00 million (as compared with €4.19 million in 2020).

#### Other expenses

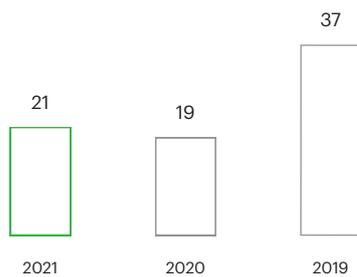
<b>€69.27 million</b> +131.05% vs. 2020	<b>€2.19 million</b> +0.92% vs. 2020	<b>€12.00 million</b> +186.40% vs. 2020
Supplies (gas and electricity)	Other taxes	CO <sub>2</sub> allowances consumed

### 7.3.3 EBITDA and Net profit

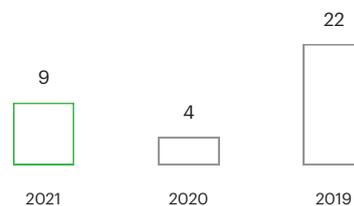
Despite sharp increases in raw material, gas and power prices, Iberpapel posted a net profit of €9.29 million, representing an increase of 119% on 2020.

In these extraordinary cost inflation circumstances, Iberpapel reported EBITDA of €21.07 million, 10% more than in 2020.

EBITDA trend (million euro)



Net profit trend (million euro)

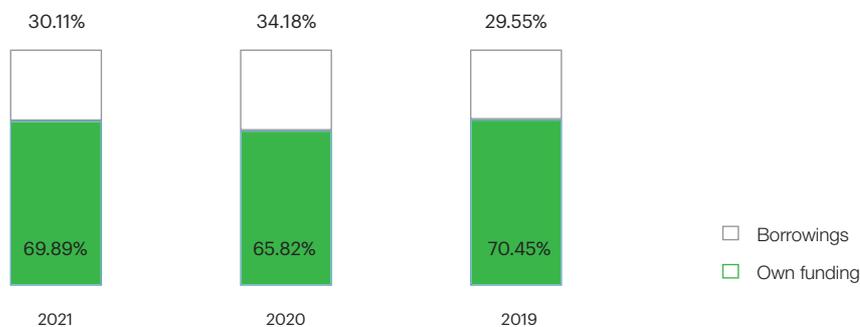


### 7.3.4 Iberpapel's financial trends

At year-end 2021, Iberpapel's shareholders' funds account for 69.89% of total liabilities (2020: 65.82%).

There follows a breakdown of key figures reflecting trends in the Group's solid financial structure:

Financial structure



**Balance sheet**

Million euro	2021	2020	2019
Total assets	385.84	397.94	378.76
Non-current assets	216.94	215.01	168.84
Current assets	168.90	182.94	209.92
Total equity/liabilities	385.84	397.94	378.76
Capital and reserves	269.65	260.89	266.83
Non-current liabilities	39.87	86.72	53.49
Current liabilities	76.32	50.34	58.44

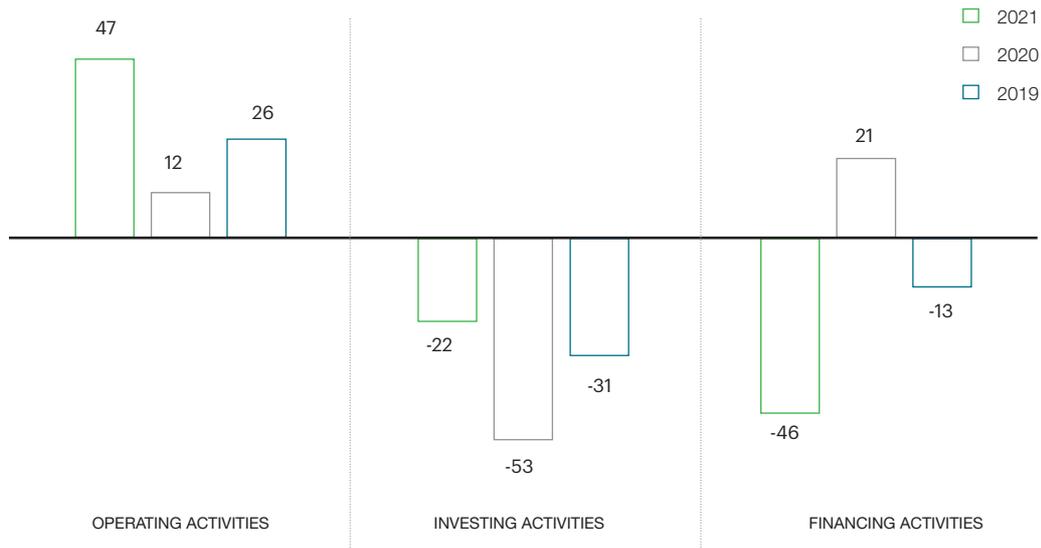
Note: Data at 31 December each fiscal year

**Net debt**

Million euro	2021	2020	2019
Net debt	(53.12)	(32.95)	(78.77)
Short- and long-term bank borrowings	52.12	93.38	68.23
(Less: Cash and cash equivalents)	(105.24)	(126.32)	(147.01)
Equity	269.65	260.89	266.83
Leverage ratio	(19.70)%	(12.63)%	(29.52)%

The Iberpapel Group has long-term credit lines and loans amounting to €63.5 million (€138 million in 2020).

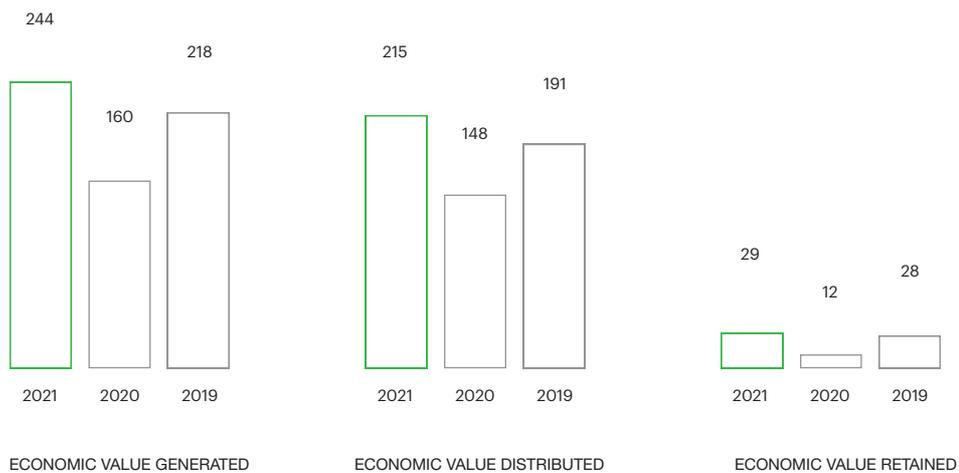
Cash flows by activity (million euro)



The above-mentioned terms include the following items:

The Iberpapel Group makes a valuable contribution to society through its activities. Economic value generated, distributed and retained during 2019, 2020 and 2021 is shown in the chart below.

Economic value trend (million euro)



As support for the above information, we also show the itemised figures for the last three years for economic value generated, distributed and retained:

### Economic Value Generated (EVG)

Revenue (net sales plus income from financial investments and sales of assets).

#### Trend in Economic Value Generated (EVG) 2021-2019

Million euro	2021	2020	2019
Net sales	237.23	152.88	213.47
Other income	6.01	10.77	4.87
Financial income	0.92	(1.57)	(0.02)
Profit/(loss) on disposal of non-current assets	0.03	(1.65)	
Economic Value Generated	244.19	160.43	218.32

### Economic Value Distributed (EVD)

- Operating costs.
- Salaries and fringe benefits for employees.
- Taxes paid.
- Local community investments.

#### Trend in Economic Value Distributed (EVD) 2021-2019

Million euro	2021	2020	2019
Raw materials and consumables	82.62	65.55	88.37
Other expenses	113.20	61.45	77.66
Wages and salaries	19.70	20.17	20.30
Income tax	(0.57)	0.86	4.45
Economic Value Distributed	214.95	148.03	190.78

### Economic Value Retained (EVR)

Reserves, depreciation and amortisation, etc.

#### Trend in Economic Value Retained (EVR) 2021-2019

Million euro	2021	2020	2019
Economic Value Retained	29.24	12.40	27.56

### 7.3.5 Main financial and management ratios

As a transparency measure and to facilitate the understanding and clarity of the financial information reported through an analysis of our results, financial situation and trends, Iberpapel's most relevant ratios are summarised as follows:

#### Financial highlights

	2021	2020	2019
Return on Equity (%)	7.81	7.33	13.86
EBITDA return on equity (%)	3.44	1.63	8.13
Working capital (million euro)	92.58	132.59	151.48
General liquidity (x)	2.21	3.63	3.59
Net debt/Equity (%)	(19.70)	(12.63)	(29.52)
Net debt/EBITDA	(2.59)	(1.72)	(2.12)

## 7.4 FISCAL CONTRIBUTION AND RESPONSIBILITY

GRI: 201-4, 207-1, 207-2, 207-3, 207-4

Iberpapel makes an appropriate fiscal contribution in the countries where we operate. During 2016, the Company's Board of Directors, in response to a proposal by the Finance Department and to comply with Article 529.iii) of the Spanish Companies Act, designed the Iberpapel Group's tax strategy, defining the principles governing the tax function.

The Finance Department also prepared, in 2016, and continued to apply in 2021, the Tax Risk Management System (SGRF), the purpose being to lay down principles and guidelines to ensure that tax risks that could affect the tax strategy and objectives are identified, assessed and managed systematically, in order to comply with the new requirements of the Spanish Companies Act and of stakeholders.

#### Principles guiding the tax function at Iberpapel:

1. Fulfilment of tax obligations
2. Interaction with tax authorities
3. Preparation of fiscal financial information
4. Use of non-opaque structures
5. Application of tax legislation
6. Mandatory analysis of transactions that show special complexity or tax relevance
7. Valuation of controlled transactions
8. Composition of the Finance Department
9. External tax advisors
10. Criminal risk prevention system
11. Training and upskilling programmes

**Profit before tax on a country-by-country basis**

Million euro	2021	2020	2019
Spain	6,435	5,068	24,516
Argentina	188	46	(123)
Uruguay	2,095	(13)	1,735

**Income tax paid**

Million euro	2021	2020	2019
Income tax paid	(502)	(5,660)	(5,936)

**Public Administrations**

Million euro	2021	2020	2019
Government grants received	1.881	0.851	1.234

## 7.5 STOCK PRICE PERFORMANCE

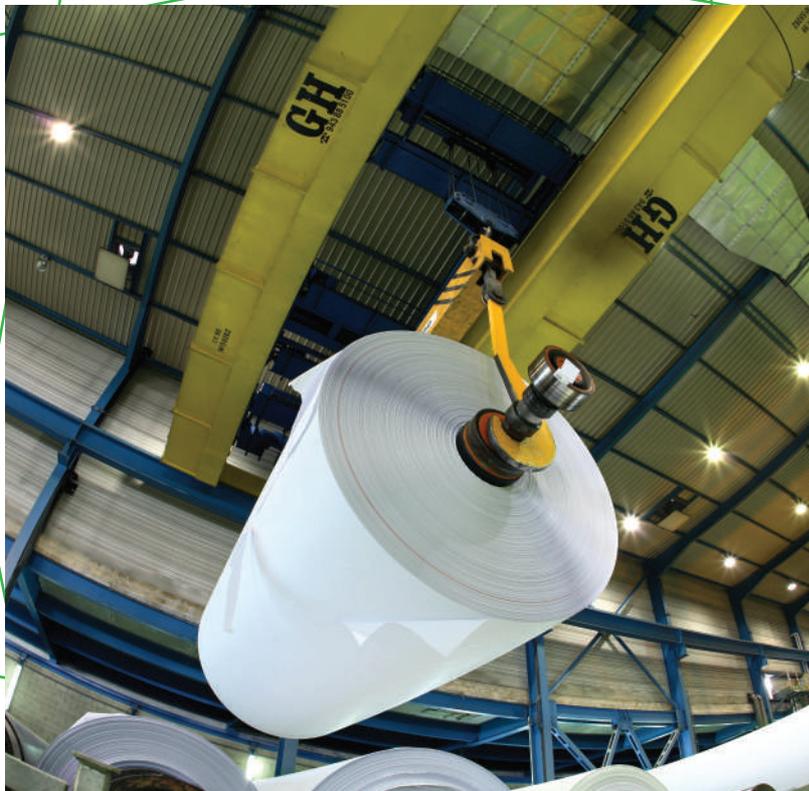
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At year-end 2021, the Iberpapel Group's share price recovered 4.65% compared to the 2020 closing price.

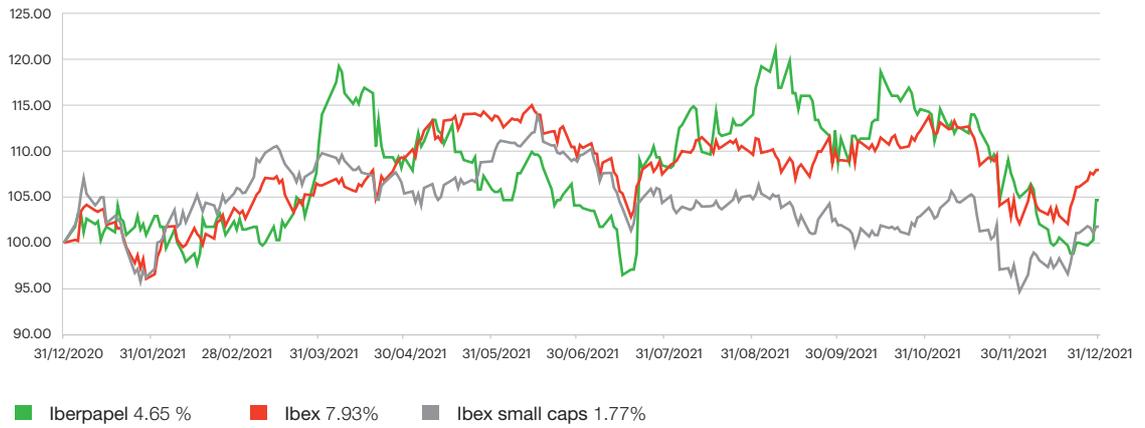
### Iberpapel Group's share price and shareholder dividend

The Iberpapel Group's share price closed at €18.00 on 31 December 2021 after increasing by 4.65% above the previous year's closing price. The stock reached a high of €20.80 in September.

On 28 September 2021, the Company's Board of Directors resolved to pay a gross interim dividend of €0.25 per share out of 2021 profits for a total of €2,722 thousand, which was paid on 21 October. The Board of Directors' proposals to the Annual General Meeting will include the payment of a supplementary, final gross dividend of €0.25 per share, making a total gross dividend of €0.50 per share.

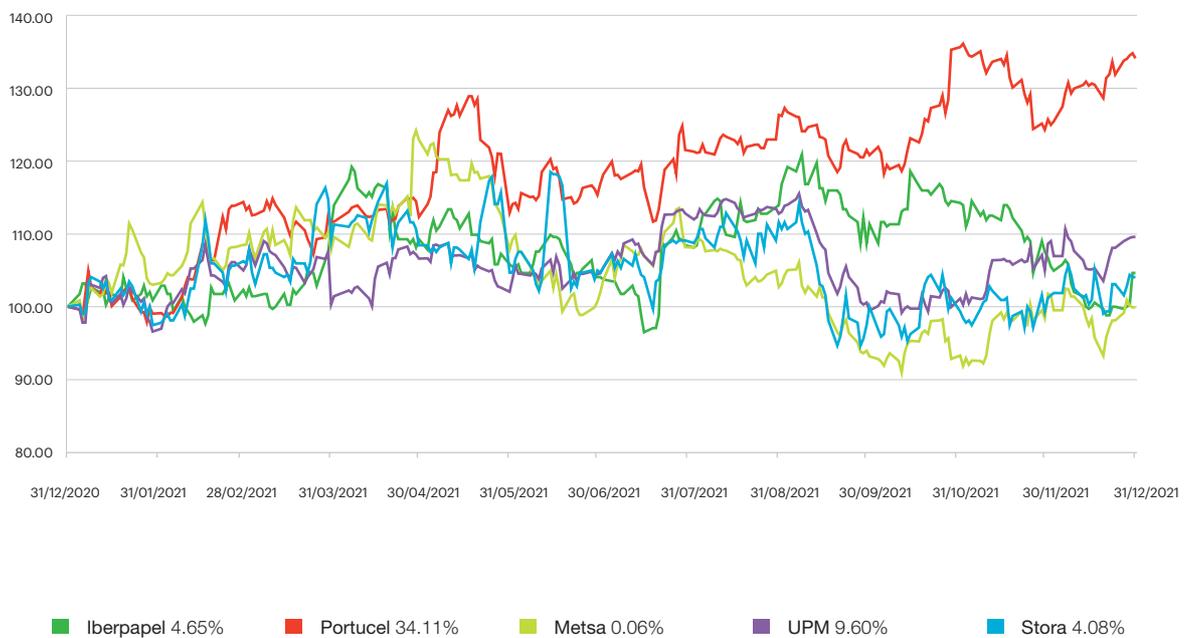


**SHARE PRICE TRENDS IN 2021 COMPARED WITH THE IBEX 35 AND THE IBEX SMALL CAPS**  
(BASE 100 AT 31/12/2020)



The share price as compared with the leading European industry companies

**SHARE PRICE TREND IN 2021 COMPARED WITH OTHER INDUSTRY COMPANIES**  
(BASE 100 AT 31/12/2020)



### Main stock data trends (2021-2019)

There follows a description of these three-year trends so our stakeholders can better understand our stock data:

#### Main stock data trends (2021-2019)

Million euro	2021	2020	2019
Shares admitted to trading (€M)	6.62	6.62	6.62
No. of shares (x1000)	11,040	11,040	11,040
Capitalisation (€M)	198.72	189.89	281.52
Volume traded (thousands of shares)	1,394	1,235	1,354
Cash value traded (€M)	25.70	24.48	36.22
Closing price (€)	18.00	17.20	25.50
Maximum price (€)	20.80 (07-Sep)	26.30 (02-Feb)	33.60 (2-Ene)
Minimum price (€)	16.50 (12-Feb)	15.50 (05-Nov)	23.80 (18-Nov)

### Shareholder and investor relations

Accessibility and transparency are key to all the Iberpapel Group's stakeholders, particularly our shareholders and investors.

Iberpapel has a relationship with its shareholders and investors based on transparency and adequate information channels to assure a permanent flow of information accessible to all.

This is reflected in our corporate website <http://www.iberpapel.es>, which is continuously updated to include all the information necessary on the organisation, as well as quarterly and half-yearly results, price-sensitive information and any other information of interest.

Our Customer Relations Department is open to queries through the following communication channels:



- Website: [www.iberpapel.es](http://www.iberpapel.es)



- E-mail: [atencion.al.accionista@iberpapel.es](mailto:atencion.al.accionista@iberpapel.es)



- Tel.: +34 91 564 07 20



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# APPENDICES



## APPENDIX I: REGARDING THIS REPORT

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GRI: 102-10, 102-42, 102-43, 102-44, 102-46, 102-47, 102-51, 102-52, 103-1

### A. METHODOLOGY

#### REPORTING SCOPE

This Annual Report provides clear, concise and relevant information on our performance in sustainability matters identified as the most relevant both to Iberpapel and to our stakeholders. We report our management results and our Corporate Social Responsibility and Corporate Governance initiatives each year.

This report addresses the activities of our three divisions (forestry, industrial and commercial) in all the countries in which we operated (Spain, Argentina and Uruguay) and where we conducted commercial activities (Europe, Africa and South America) in 2021. The latest report published was the 2020 Annual Report. All the documents refers to the Group as a whole, unless otherwise stated, in which case the activities or divisions in question are indicated.

Any scope limitations on the information reported are disclosed in the pertinent section.

Prior-year data are furnished for clarity.

#### PREPARATION OF THE ANNUAL REPORT

Since 2011, Iberpapel has prepared its Annual Report observing the requirements of the Global Reporting Initiative (GRI) on the preparation of Sustainability Reports. This year, it has been drawn up applying the GRI Standards "Essential Criteria" option and Recommendation 55 of the Spanish National Security Market Commission (CNMV)'s Code of Good Governance in Listed Companies.

The contents are supplemented by the following public information for 2021:

- Consolidated Annual Accounts of the Iberpapel Group, including the Consolidated Management Report.
- Annual Corporate Governance Report, Annual Report on Directors' Remuneration and Committee Annual Reports.
- Other contents of interest that may be found in our corporate website: <http://www.iberpapel.es>

The materiality analysis carried out in the previous year has been reviewed and updated this year. The main information sources consulted are listed below:

#### External agents

- Investor analysis.
- Analysis of CSR standards.
- Press analysis.
- Matters considered by industry companies.
- Subjects highlighted by industry and CSR thought leaders.
- Stakeholder consultation.
- Analysis of global and industry trends.

#### Internal agents

- Interviews with the Iberpapel Group's area directors.
- Policies and commitments.
- Iberpapel Group's corporate reports.
- Prior-year materiality analysis.
- Press releases published by the Company.

## STAKEHOLDERS

GRI: 102-43

We also reviewed the identity of our main stakeholders during the year. Our principal stakeholders are those with which we have a direct or indirect relationship; they influence our success and are most affected by the organisation. There follows a list of the principal stakeholders identified:

- Customers.
- Suppliers.
- Employees.
- Shareholders, investors and the financial community.
- Regulators and associations.
- Society.
- Environment.

## Basic principles considered when preparing this report

This document has been conceived and drawn up following the recommendations and principles of the Global Reporting Initiative (GRI) for the compilation of content, as explained below:

### PRINCIPLES OF THE GRI STANDARDS ON THE PREPARATION OF SUSTAINABILITY REPORTS

#### CONTENT PRINCIPLES

##### Stakeholder engagement

The Iberpapel Group identifies and has an ongoing dialogue with all stakeholders (see Chapter 2.2). So we are able to identify their main interests and concerns and we strive to listen and respond in a personalised way. This dialogue also allows us to discover matters that our stakeholders consider to be relevant for inclusion in this report.

##### Sustainability context

We are committed to sustainable development, as reflected in our strategy and activities, managing natural resources sustainably and responsibly, and continuously seeking to generate value (economic, employment, development, etc.) for all our stakeholders.

##### Materiality

We have analysed materiality to identify the most relevant social, environmental, economic, ethical and good governance issues for both the Company and its main stakeholders.

##### Completeness

Throughout the Annual Report, the main stakeholders related to each material topic are indicated, stating where the main impact occurs (outside or inside the organisation, or both).

#### QUALITY PRINCIPLES

##### Accuracy

The information contained in this report is accurate in qualitative and quantitative terms so the main stakeholders have the capacity to assess the organisation's performance.

##### Balance

This Annual Report includes positive and negative aspects of Iberpapel's performance so as to provide a full view of the Company.

##### Clarity

The information is presented clearly so the main stakeholders can obtain a reasonable understanding of the Company and its activities.

##### Comparability

We have presented the information in such a way that the main stakeholders can analyse the evolution of the organisation's results and compare it with the performance of other organisations.

##### Reliability

The Company has prepared an annual report for a number of years and has solid information collection and review processes which we seek to improve and optimise each year.

##### Timeliness

The Group presents its Annual Report each year so the main stakeholders can obtain more insight into the Company's performance and milestones.

This Annual Report also follows the three precepts of Standard AA1000 APS (2008).

- **Engagement:** Iberpapel has a stakeholder engagement process that allows their involvement in the development of a responsible approach to sustainability management.
- **Materiality:** The Group has a process in place to determine materiality, which requires an understanding of the topics that are material or relevant to the Company and its stakeholders.
- **Responsiveness:** Iberpapel responds through specific actions and commitments to the material topics identified by the Company in its materiality analysis.

## B. MATERIALITY ANALYSIS

GRI: 102-10, 102-46, 102-47, 103-1

### RELEVANT MATTERS

The 2021 Annual Report has been prepared observing the materiality principle so as to report on the economic, social and environmental matters that are relevant to the organisation and affect its stakeholders' assessments and decisions.

With this in mind, we have revised our materiality analysis in association with an independent external firm specialised in this field so as to accurately identify and update the most relevant issues relating to our Group's activities.

A number of internal and external consultation processes have been undertaken with our main stakeholders, as well as with other influential bodies such as industry associations and the media.

During the process, we have analysed the matters of most relevance to external and internal agents from an environmental, social and governance (ESG) perspective. This consisted of scoring the relevance of each matter (on a scale of 1100), based on comments received from the agents analysed and the relative significance of the measures taken and observed (externally and internally). It is all reflected in a two-axis matrix in which the matters with the highest scores are seen to be the "most relevant".

In this report, we have also revised the prioritisation of the matters identified based on their importance for each stakeholder group and for our Company's strategic approach.

These matters are listed below:

**Economic dimension**

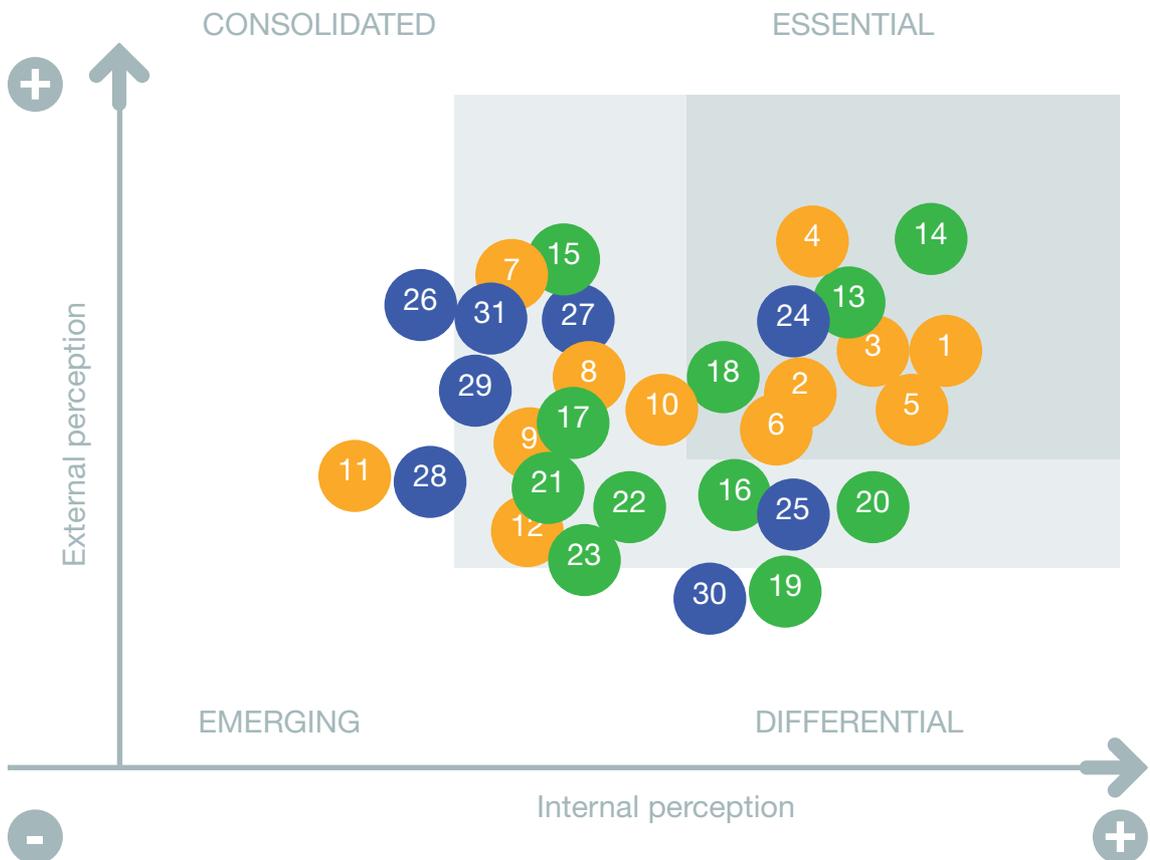
- 1. Economic performance
- 2. Business strategy
- 3. Information transparency
- 4. Sustainable R&D (products and services)
- 5. Business risks and opportunities
- 6. Technological innovation (facilities and equipment)
- 7. Regulatory compliance
- 8. Service/product quality
- 9. Codes of conduct
- 10. Customer trust and satisfaction
- 11. Digitalisation and information security
- 12. Organisational structure

**Environmental dimension**

- 13. Sustainable forest management
- 14. Climate change, carbon footprint and other atmospheric emissions
- 15. Environmental Management Systems
- 16. Rational use of natural resources
- 17. Water use and conservation
- 18. Energy transition (use of renewables, cogeneration, clean fuels and energy saving)
- 19. Supplier selection criteria
- 20. Environmental awareness-building
- 21. Biodiversity
- 22. Circular economy, waste and effluent management
- 23. Sustainable logistics and transport

**Social dimension**

- 24. Safety and Occupational Risk Prevention
- 25. Active dialogue and collaborative relationships with stakeholders
- 26. Professional training and development
- 27. Diversity, inclusion, integration and equal conditions
- 28. Talent attraction and retention
- 29. Local community development (direct, indirect and induced local job creation; value creation, etc.)
- 30. Life/work balance and other fringe benefits
- 31. Working conditions and human rights



- Economic and operational dimension
- Environmental dimension
- Social dimension

There follows a description of the material aspects identified and their relationship with the associated GRI standards:

Stakeholders ▼	Material aspects ▼	GRI topic ▼	GRI content ▼
Customers and Investors	Information transparency: transparency commitment with stakeholders in the short and long term.	General content: Stakeholder engagement	102-40; 102-41; 102-42; 102-43; 102-44
Investors	Business strategy and organisational structure / Business risks and opportunities: communication of the Company's strategy, risks and opportunities.	General content: Strategy.	102-14; 102-15
Investors	Economic performance: solvency, robustness and sound economic performance.	Thematic content: Economic performance.	103-1; 103-2; 103-3; 201-1; 201-4
Customers, Investors, Society, Environment	Technological improvement and sustainable R&D: projects and initiatives, improvement of facilities, improvement of production processes and search for new products.	Thematic content: Indirect economic impacts.	103-1; 103-2; 103-3; 203-1
Regulators, Society, Investors	Regulatory compliance: ongoing legislation supervision and monitoring mechanisms and compliance with applicable laws.	Thematic content: Environmental compliance and socioeconomic compliance.	103-1; 103-2; 103-3; 203-1
Employees, Customers, Suppliers	Codes of Conduct: Code of Conduct and Whistleblower Channel.	General content: Ethics and integrity.	102-16; 102-17
Customers, Environment, Society	Sustainable forest management, environmental management systems, rational use of natural resources and environmental awareness: sustainability of raw materials (e.g. sustainable forest management, reforestation policies, chains of custody).	Thematic content: Materials.	103-1; 103-2; 103-3; 301-1
Suppliers, Customers	Supplier selection criteria: timber supplies from certified, innovative and distinctive suppliers.	Thematic content: Environmental assessment of suppliers.	103-1; 103-2; 103-3; 204-1; 103-1; 103-2; 103-3; 308-1; 103-1; 103-2; 103-3; 414-1
Environment, Regulators, Customers, Society	Climate change and carbon footprint: reduction in carbon emissions, Clean Development Mechanism (CDM) derived from the Kyoto Protocol and implementation of Best Available Technologies (BAT).	Thematic content: Emissions	103-1; 103-2; 103-3; 305-1; 305-2; 305-7
Environment, Regulators, Customers, Society	Energy transition / Climate change / Clean fuels: energy efficiency and climate change, cogeneration and biomass energy recovery.	Thematic content: Electricity.	103-1; 103-2; 103-3; 302-1; 302-3
Environment, Customers, Society	Water use and conservation: water management.	Thematic content: Water.	103-1; 103-2; 103-3; 303-1; 303-3
Environment, Customers, Society	Circular economy, waste and effluent management: odour treatment and elimination systems, waste management and water treatment and purification	Thematic content: Effluents and waste.	103-1; 103-2; 103-3; 306-1; 306-2
Environment, Society	Biodiversity and sustainable forest management: initiatives to protect biodiversity.	Thematic content: Biodiversity.	103-1; 103-2; 103-3; 304-1; 304-2; 304-3

Stakeholders	Material aspects	GRI topic	GRI content
Customers and Investors	Service/product quality and Customer trust and satisfaction: product certification.	Thematic content: Marketing and labelling.	103-1; 103-2; 103-3; 417-1; 417-2; 417-3
Customers, Employees	Safety and Occupational Risk Prevention (ORP): safety and ORP in production, storage processes, etc.	Thematic content: Occupational health and safety; Customer health and safety.	103-1; 103-2; 103-3; 403-1; 403-2; 403-3; 403-4; 403-5; 403-6; 403-8; 403-9; 403-10
Society	Local community development: local development and support for business fabric.	Thematic content: Local communities.	103-1; 103-2; 103-3; 203-2; 103-1; 103-2; 103-3; 413-1
Customers, Investors, Suppliers, Society, Environment, Regulators	Active dialogue and collaborative relationships with stakeholders: ongoing dialogue with internal and external stakeholders.	Thematic content: Stakeholder engagement.	102-40; 102-41; 102-42; 102-43; 102-44
Employees	Talent attraction and retention, Professional training and development, Life-work balance and other fringe benefits: workforce.	Thematic content: Employment.	103-1; 103-2; 103-3; 401-1; 401-2; 103-1; 103-2; 103-3; 404-1; 404-2
Employees, Society.	Diversity, inclusion, integration and equal conditions: equal opportunities for employees and non-discrimination. Thematic content: Non-discrimination	Thematic content: Diversity and equal opportunities.	103-1; 103-2; 103-3; 406-1; 103-1; 103-2; 103-3; 405-1; 405-2
Employees, Society	Working conditions and human rights: collective agreement.	Thematic content: Freedom of association and collective bargaining.	103-1; 103-2; 103-3; 407-1

**Significant changes in relation to the previous year**

During the current reporting period, there were no significant changes to size, structure and ownership, or to the scope, coverage and valuation methods applied in the report.

In the event of significant changes to any of the above-mentioned matters or the need to include information on joint ventures, subsidiaries, leased facilities, subcontracted activities and other entities that could affect the comparability of reporting periods, this will be indicated in the relevant section.

**C. CONTACT DETAILS**

Any queries relating to the Iberpapel Group's Annual Report may be addressed to:

**Investor Relations Department:**

+34 91 564 07 20

[atención.al.accionista@iberpapel.es](mailto:atención.al.accionista@iberpapel.es)

## APPENDIX II: GRI CONTENT LIST

GRI: 102-55

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>GENERAL CONTENT</b>					
<b>Organizational profile</b>					
	102-1	Iberpapel Gestión S.A.	Group	Name of the organization	
	102-2	Pillars of the Iberpapel Group's strategy in 2020 <a href="#">p.26</a> 3.5 The Iberpapel Group's business <a href="#">p. 32</a>	Group	Activities, brands, products and services	
	102-3	Av. Sancho El Sabio, 2 - 1º 20010 San Sebastián. (Spain)	Group	Location of headquarters	
	102-4	Pillars of the Iberpapel Group's strategy for 2022 <a href="#">p. 26</a> 3.5 The Iberpapel Group's business <a href="#">p. 32</a>	Group	Location of operations	
	102-5	Appendix III <a href="#">p. 223</a>	Group	Ownership and legal form	
	102-6	Pillars of the Iberpapel Group's strategy for 2022 <a href="#">p. 26</a> 3.5 The Iberpapel Group's business <a href="#">p. 32</a>	Group	Markets served	
	102-7	Iberpapel's highlights <a href="#">p. 8</a>	Group	Scale of the organization	
	102-8	4.3 Responsibility to our people Our people management <a href="#">p. 65-85</a>	Group	Information on employees and other workers	SDG 8
	102-9	4.5 Responsibility to our suppliers <a href="#">p. 91-97</a>	Group	Supply chain	
	102-10	Significant changes. Appendix I <a href="#">p. 209</a>	Group	Significant changes to the organization and its supply chain	
	102-11	The Iberpapel Group applies the precautionary principle in all its activities, continuously striving to minimise environmental impacts <a href="#">p. 115</a>	Group	Precautionary Principle or approach	
	102-12	4.6 Responsibility to our local community; Involvement in forums and associations <a href="#">p. 104</a>	Group	External initiatives	SDG 17
	102-13	4.6 Responsibility to our local community; Involvement in forums and associations <a href="#">p. 104</a>	Group	Membership of associations	SDG 17

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Strategy</b>					
	102-14	Chairman's Letter p. 4-5	Group	Statement from the Chairman	
	102-15	6.8 Integrated risk management p. 179-185	Group	Key impacts, risks, and opportunities	
<b>Ethics and integrity</b>					
	102-16	6.7 Ethical framework and regulatory compliance p. 175-179	Group	Values, principles, standards, and norms of behaviour	SDG 16
	102-17	6.7 Ethical framework and regulatory compliance p. 175-179	Group	Mechanisms for advice and concerns about ethics	SDG 16
<b>Governance</b>					
	102-18	6.5 The Iberpapel Group's Corporate Governance System p. 156-172	Group	Governance structure	
	102-19	3.3 Our strategic vision and outlook p. 23 6.4 Principles for socially responsible governance p. 154-155 6.5 The Iberpapel Group's Corporate Governance System p. 156-171	Group	Delegating authority	
	102-20	3.3 Our strategic vision and outlook p. 23 6.4 Principles for socially responsible governance p. 154-155 6.5 The Iberpapel Group's Corporate Governance System p. 156-171	Group	Executive-level responsibility for economic, environmental, and social topics	
	102-21	4.2 Stakeholder dialogue commitment: Management approach to stakeholder dialogue p. 61-64 6.4 Principles for socially responsible governance p. 154-155 6.5 The Iberpapel Group's Corporate Governance System p. 156-171	Group	Consulting stakeholders on economic, environmental and social topics	ODS 16
	102-22	6.5 The Iberpapel Group's Corporate Governance System p. 156-171	Group	Composition of the highest governance body and its committees	ODS 5
	102-23	6.5 The Iberpapel Group's Corporate Governance System p. 156-171	Group	Information on whether the chair of the highest governance body also holds an executive post	
	102-24	6.5 The Iberpapel Group's Corporate Governance System p. 156-171	Group	Nominating and selecting the highest governance body	ODS 5
	102-25	6.4 Principles for socially responsible governance p. 154-155 6.7 Ethical framework and regulatory compliance p. 175-178	Group	Conflicts of interest	ODS 16
	102-26	3.3 Our strategic vision and outlook p. 23 6.4 Principles for socially responsible governance p. 154-155 6.5 The Iberpapel Group's Corporate Governance System Annual Corporate Governance Report p. 156-171	Group	Role of highest governance body in setting purpose, values, and strategy	
	102-27	Annual Corporate Governance Report p. 169 <a href="http://www.iberpapel.es/archivos/accionista_e_inversores/gobierno_corporativo/Informe-Anual-2020.pdf">http://www.iberpapel.es/archivos/accionista_e_inversores/gobierno_corporativo/Informe-Anual-2020.pdf</a>		Collective knowledge of highest governance body	

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Governance</b>					
	102-28	6.5 The Iberpapel Group's Corporate Governance System p. 156-171	Group	Evaluating the highest governance body's performance	
	102-29	6.8. Integrated risk management p. 179-185	Group	Identifying and managing economic, environmental, and social impacts	SDG 16
	102-30	6.8. Integrated risk management p. 179-185	Group	Effectiveness of risk management processes	
	102-31	6.8. Integrated risk management p. 179-185	Group	Highest governance body's role in sustainability reporting	
	102-32	3.3 Our strategic vision and outlook p. 23-27 6.5 The Iberpapel Group's Corporate Governance System p. 156-171	Group	Highest governance body's role in sustainability reporting	
	102-35	6.5 The Iberpapel Group's Corporate Governance System p. 156-171	Group	Remuneration policies	
	102-36	6.5 The Iberpapel Group's Corporate Governance System p. 156-171	Group	Process for determining remuneration	
<b>Stakeholder engagement</b>					
	102-40	4.2. Stakeholder dialogue commitment p. 61-64	Group	List of stakeholders	
	102-41	Our people management. 4.3 Responsibility to our people p. 73	Group	Collective bargaining agreements	SDG 8
	102-42	Stakeholders. Appendix I p. 203	Group	Identifying and selecting stakeholders	
	102-43	Stakeholders. Appendix I p. 203	Group	Approach to stakeholder engagement	SDG 16
	102-44	Dialogue with the main stakeholders. Appendix I. B p. 206	Group	Key topics and concerns raised	
<b>Reporting practice</b>					
	102-45	2021 Consolidated Annual Accounts. Appendix I. Subsidiaries included in the consolidation scope <a href="https://www.iberpapel.es/informacion-economica-y-financiera/">https://www.iberpapel.es/informacion-economica-y-financiera/</a>	Group	Entities included in the consolidated financial statements	
	102-46	Appendix I. B Relevance and materiality in the 2021 Annual Report p. 206-209	Group	Defining report content and topic boundaries	
	102-47	Appendix I. B Relevance and materiality in the 2021 Annual Report p. 206-209	Group	List of material topics	
	102-48	No information from prior-year reports has been restated this year.	Group	Restatements of information	
	102-49	There have been no changes to the scope or boundary of any content with respect to prior years.	Group	Changes in reporting	

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Stakeholder engagement</b>					
	102-50	This Annual Report relates to the Iberpapel Group's 2021 activities.	Group	Reporting period	
		Appendix I p. 203	Group	Date of most recent report	
	102-51	Appendix I p. 203	Group	Reporting cycle	
	102-52	Appendix II Contact data p. 223	Group	Contact point for questions regarding the report	
	102-53				
	102-54	This report has been drawn up in accordance with the GRI Standards "Essential Criteria" option.	Group	GRI Standards option	
		Appendix II - p. 210	Group	GRI content list	
	102-55				
	102-56	This Annual Report has not been verified by an independent external party.	Group	External assurance	

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>SPECIFIC CONTENT</b>					
<b>Economic performance</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	7.3 Management results p. 188	Group	The management approach and its components	
	103-3	7.3 Management results p. 188	Group	Evaluation of the management approach	
GRI 201: Economic performance 2016	201-1	7.3 Management results p. 188	Group	Direct economic value generated and distributed	
	201-4	7.4 Fiscal contribution and responsibility p. 196 The Iberpapel Group's 2021 Consolidated Annual Accounts. Notes to the financial statements: Note 18. "Borrowings and government grants" <a href="https://www.iberpapel.es/informacion-economica-y-financiera/">https://www.iberpapel.es/informacion-economica-y-financiera/</a>	Group	Financial assistance received from government	
<b>Indirect economic impacts</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.6 Responsibility to our local community: Socioeconomic contribution to local development p. 98	Group	The management approach and its components	
	103-3	4.6 Responsibility to our local community: Socioeconomic contribution to local development p. 98	Group	Evaluation of the management approach	
GRI 203: Indirect economic impacts 2016	203-1	3.4 Investment and innovation in the Iberpapel Group p. 28	Group	Infrastructure investments and services supported	SDG 9
	203-2	4.6 Responsibility to our local community: Socioeconomic contribution to local development p. 98	Group	Significant indirect economic impacts	SDG 11

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Procurement practices</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.5 Responsibility to our suppliers: Responsibility to our suppliers p. 91	Group	The management approach and its components	
	103-3	4.5 Responsibility to our suppliers: Responsibility to our suppliers p. 91	Group	Evaluation of the management approach	
GRI 204: Procurement practices 2016	204-1	4.5 Responsibility to our suppliers: Main impacts on the community through our supply chain p. 91	Group	Proportion of spending on local suppliers	
<b>Anti-corruption</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209		Explanation of the material topic and its boundary	
	103-2	6.7 Ethical framework and regulatory compliance p. 175-178	Group	The management approach and its components	
	103-3	6.7 Ethical framework and regulatory compliance p. 175-178	Group	Evaluation of the management approach	
GRI 205: Anti-corruption 2016	205-2	6.4 Principles for socially responsible governance p. 154-156 6.6. Ethical framework and regulatory compliance p. 175-178	Group	Communication and training about anti-corruption policies and procedures	
	205-3	No incidents of corruption have been detected.	Group	Confirmed incidents of corruption and actions taken	
<b>Anti-competitive behaviour</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	6.7 Ethical framework and regulatory compliance p. 175-178	Group	The management approach and its components	
	103-3	6.7 Ethical framework and regulatory compliance p. 175-178	Group	Evaluation of the management approach	
GRI 206: Anti-competitive behaviour 2016	206-1	The Iberpapel has received no claims for anti-competitive behaviour.		Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Tax</b>					
GRI 207: Tax 2019	207-1	7.4 Fiscal contribution and responsibility p. 196	Group	Tax approach	
	207-2	7.4 Fiscal contribution and responsibility p. 196	Group	Tax governance, control and risk management	
	207-3	7.4 Fiscal contribution and responsibility p. 196	Group	Stakeholder engagement and management of concerns related to tax	
	207-4	7.4 Fiscal contribution and responsibility p. 196	Group	Country-by-country reporting	SDG 8
<b>Materials</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209		Explanation of the material topic and its boundary	
	103-2	5.2 Environmental responsibility: Consumption of raw materials and by-products p. 118-120	Group	The management approach and its components	
	103-3	5.2 Environmental responsibility: Consumption of raw materials and by-products p. 118-120	Group	Evaluation of the management approach	
GRI 301: Materials 2016	301-1	5.2 Environmental responsibility: Consumption of raw materials and by-products p. 118-120	Group	Materials used by weight or volume	SDG 12
<b>Energy</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	5.2 Environmental responsibility: Energy and climate change p. 126-133	Group	The management approach and its components	
	103-3	5.2 Environmental responsibility: Energy and climate change p. 126-133	Group	Evaluation of the management approach	
GRI 302: Energy 2016	302-1	5.2 Environmental responsibility: Energy and climate change p. 126-133		Energy consumption within the organization	SDG 7
	302-3	5.2 Environmental responsibility: Energy and climate change p. 126-133		Energy intensity	SDG 7
<b>Water</b>					
GRI 303: Water and effluents 2018	303-1	5.2 Environmental responsibility: Liquid effluents and water use p. 140-141	Group	Interactions with water as a shared resource	SDG 6
	303-2	5.2 Environmental responsibility: Liquid effluents and water use p. 140-141	Group	Management of water discharge-related impacts	SDG 6
	303-3	5.2 Environmental responsibility: Liquid effluents and water use p. 140-141	Group	Water extraction	SDG 6

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Biodiversity</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	5.2 Environmental responsibility: Biodiversity protection p. 142-145	Group	The management approach and its components	
	103-3	5.2 Environmental responsibility: Biodiversity protection p. 142-145	Group	Evaluation of the management approach	
GRI 304: Biodiversity 2016	304-1	5.2 Environmental responsibility: Biodiversity protection p. 142-145	Group	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	SDG 15
	304-2	5.2 Environmental responsibility: Biodiversity protection p. 142-145	Group	Significant impacts of activities, products, and services on biodiversity	SDG 15
	304-3	5.2 Environmental responsibility: Biodiversity protection p. 142-145	Group	Habitats protected or restored	SDG 15
<b>Emissions</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Grupo	Explanation of the material topic and its boundary	
	103-2	5.2 Environmental responsibility: Energy and climate change p. 126-133 5.2 Environmental responsibility: Energy and climate change p. 126-133	Grupo	The management approach and its components	
	103-3	5.2 Environmental responsibility: Energy and climate change p. 126-133 5.2 Environmental responsibility: Energy and climate change p. 126-133	Grupo Grupo	Evaluation of the management approach	
GRI 305: Emissions 2016	305-1	5.2 Environmental responsibility: Energy and climate change p. 126-133		Direct (Scope 1) GHG emissions	SDG 13
	305-2	5.2 Environmental responsibility: Energy and climate change p. 126-133	Grupo	Energy indirect (Scope 2) GHG emissions	SDG 13
	305-4	5.2 Environmental responsibility: Energy and climate change p. 126-133		Greenhouse gas emissions intensity	SDG 13
	305-7	5.2 Environmental responsibility: Energy and climate change p. 126-133		Nitrogen oxides (NOX), sulphur oxides (SOX) and other significant air emissions	ODS 13

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Effluents and waste</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	5.2 Environmental responsibility: Waste management and circular economy p. 138-139 5.2 Environmental responsibility: liquid effluents and water use p. 138-139	Group	The management approach and its components	
	103-3	5.2 Environmental responsibility: Waste management and circular economy p. 138-139 5.2 Environmental responsibility: liquid effluents and water use p. 140-141	Group	Evaluation of the management approach	
GRI 306: Effluents and waste 2016	306-1	5.2 Environmental responsibility: Liquid effluents and water use p. 140-141	Group	Water discharge by quality and destination	SDG 6
	306-2	5.2 Environmental responsibility: Waste management and circular economy p. 138-139	Group	Waste by type and disposal method	SDG 12
<b>Environmental compliance</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	5.1. Environmental responsibility p. 107	Group	The management approach and its components	
	103-3	5.1. Environmental responsibility p. 107	Group	Evaluation of the management approach	
GRI 307: Environmental compliance 2016	307-1	5.2.3. No fine or penalty has been imposed on the Iberpapel Group 5.2. Environmental responsibility: Our Environmental Management System p. 116		Non-compliance with environmental laws and regulations	SDG 16
<b>Environmental assessment of suppliers</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.5 Responsibility to our suppliers: Summary of the raw material supplier assessment and control process p. 95	Group	The management approach and its components	
	103-3	4.5 Responsibility to our suppliers: Summary of the raw material supplier assessment and control process p. 95	Group	Evaluation of the management approach	
GRI 308: Supplier environmental assessment 2016	308-1	4.5 Responsibility to our suppliers: Summary of the raw material supplier assessment and control process p. 91	Group	New suppliers that were screened using environmental criteria	

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Employment</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.3 Responsibility to our people Talent attraction and retention p. 78-83	Group	The management approach and its components	
	103-3	4.3 Responsibility to our people Talent attraction and retention p. 78-83	Group	Evaluation of the management approach	
GRI 401: Employment 2016	401-1	4.3 Responsibility to our people Talent attraction and retention p. 78-83	Group	New employee hires and employee turnover	SDG 8
	401-2	4.3 Responsibility to our people Talent attraction and retention p. 78-83	Group	Benefits provided to full-time employees that are not provided to temporary or part-time employees	SDG 8
<b>Health and safety in the workplace</b>					
GRI 403: Occupational health and safety 2018	403-1	4.3 Responsibility to our people Health, safety and occupational risk prevention p. 74-77	Group	Occupational health and safety management system	SDG 3 SDG 8
	403-2	4.3 Responsibility to our people Health, safety and occupational risk prevention p. 74-77	Group	Hazard identification, risk assessment and incident investigation	SDG 3 SDG 8
	403-3	4.3 Responsibility to our people Health, safety and occupational risk prevention p. 74-77	Group	Occupational health services	SDG 3 SDG 8
	403-4	4.3 Responsibility to our people Health, safety and occupational risk prevention p. 74-77	Group	Worker participation, consultation, and communication on occupational health and safety	SDG 3 SDG 8
	403-5	4.3 Responsibility to our people Health, safety and occupational risk prevention p. 74-77	Group	Worker training on occupational health and safety	SDG 3 SDG 8
	403-6	4.3 Responsibility to our people Health, safety and occupational risk prevention p. 74-77	Group	Promotion of worker health	SDG 3 SDG 8
	403-8	4.3 Responsibility to our people Health, safety and occupational risk prevention p. 74-77	Group	Workers covered by an occupational health and safety management system	SDG 3 SDG 8
	403-9	4.3 Responsibility to our people Health, safety and occupational risk prevention p. 74-77		Work-related injuries	SDG 3 SDG 8
	403-10	4.3 Responsibility to our people Health, safety and occupational risk prevention p. 74-77		Work-related ill health	SDG 3 SDG 8

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Training and education</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.3 Responsibility to our people Talent attraction and retention p. 78-83	Group	The management approach and its components	
	103-3	4.3 Responsibility to our people Talent attraction and retention p. 78-83	Group	Evaluation of the management approach	
GRI 405: Training and education 2016	404-1	4.3 Responsibility to our people Talent attraction and retention p. 78-83	Group	Average hours of training per year per employee	SDG 4
	404-2	4.3 Responsibility to our people Talent attraction and retention p. 78-83	Group	Programs for upgrading employee skills and transition assistance programs	SDG 4
<b>Diversity and equal opportunities</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 205-209		Explanation of the material topic and its boundary	
	103-2	4.3 Responsibility to our people Commitment to diversity, inclusion, integration and equal opportunities p. 84-85	Group	The management approach and its components	
	103-3	4.3 Responsibility to our people Commitment to diversity, inclusion, integration and equal opportunities p. 84-85	Group	Evaluation of the management approach	
GRI 405: Diversity and equal opportunities 2016	405-1	4.3 Responsibility to our people: our people management p. 67	Group	Diversity of governance bodies and employees	SDG 5 SDG 10
	405-2	4.3 Responsibility to our people Talent attraction and retention p. 82	Group	Ratio of basic salary and remuneration of women to men	SDG 5 SDG 8
<b>Non-discrimination</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.3 Responsibility to our people Commitment to diversity, inclusion, integration and equal opportunities p. 84-85	Group	The management approach and its components	
	103-3	4.3 Responsibility to our people Commitment to diversity, inclusion, integration and equal opportunities p. 84-85	Group	Evaluation of the management approach	
GRI 406: Non-discrimination 2016	406-1	There were no cases of discrimination in the Iberpapel Group in 2021.	Group	Incidents of discrimination and corrective actions taken	SDG 5 SDG 10

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Freedom of association and collective bargaining</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.3 Responsibility to our people Our people management p. 67	Group	The management approach and its components	
	103-3	4.3 Responsibility to our people Our people management p. 67	Group	Evaluation of the management approach	
GRI 407: Freedom of association and collective bargaining 2016	407-1	4.2.2 Stakeholder dialogue commitment: Accessibility of Iberpapel's information p. 64 4.3 Responsibility to our people Our people management p. 67	Group	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	SDG 8
<b>Local communities</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.6 Responsibility to our local community: Social action initiatives p. 100	Group	The management approach and its components	
	103-3	4.6 Responsibility to our local community: Social action initiatives p. 100	Group	Evaluation of the management approach	
GRI 413: Local communities 2016	413-1	4.6 Responsibility to our local community: Social action initiatives p. 100	Group	Operations with local community engagement, impact assessments, and development programs	SDG 1
<b>Supplier social assessment</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.5 Responsibility to our suppliers: Summary of the raw material supplier assessment and control process p. 95	Group	The management approach and its components	
	103-3	4.5 Responsibility to our suppliers: Summary of the raw material supplier assessment and control process p. 95	Group	Evaluation of the management approach	
GRI 414: Supplier social assessment 2016	414-1	4.5 Responsibility to our suppliers: Summary of the raw material supplier assessment and control process p. 95	Group	New suppliers that were screened using social criteria	

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Customer health and safety</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.4 Responsibility to our customers p. 86	Group	The management approach and its components	
	103-3	4.4 Responsibility to our customers p. 86	Group	Evaluation of the management approach	
GRI 416: Customer health and safety 2016	416-1	4.4 Responsibility to our customers: Customer safety p. 87	Group	Assessment of the health and safety impacts of product and service categories	SDG 3
	416-2	No incident has been detected due to the infringement of health and safety regulations.	Group	Incidents of non-compliance concerning the health and safety impacts of products and services	SDG 3
<b>Marketing and labelling</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	4.4 Responsibility to our customers: Responsibility to our customers p. 86	Group	The management approach and its components	
	103-3	4.4 Responsibility to our customers: Responsibility to our customers p. 86	Group	Evaluation of the management approach	
GRI 417: Marketing and labelling 2016	417-1	4.4 Responsibility to our customers: Responsibility to our customers p. 86	Grupo	Requirements for product and service information and labelling	SDG 12
	417-2	There has been no infringement of regulations or of the voluntary codes related to product and service labelling.	Grupo	Incidents of non-compliance concerning product and service information and labelling	SDG 16
	417-3	There has been no infringement related to marketing communications.	Grupo	Incidents of non-compliance concerning marketing communications	Grupo

GRI standard	General basic content	Direct reference or response	Scope	Description	Link to SDGs
<b>Customer privacy</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	6.7 Ethical framework and regulatory compliance p. 175	Group	The management approach and its components	
	103-3	6.7 Ethical framework and regulatory compliance p. 175	Group	Evaluation of the management approach	
GRI 418: Customer privacy 2016	418-1	The Iberpapel Group has received no complaints for breaches of privacy or loss of customer data	Group	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Group
<b>Socioeconomic compliance</b>					
GRI 103: Management approach 2016	103-1	Appendix I. B p. 206-209	Group	Explanation of the material topic and its boundary	
	103-2	6.7 Ethical framework and regulatory compliance p. 175-178	Group	The management approach and its components	
	103-3	6.7 Ethical framework and regulatory compliance p. 175-178	Group	Evaluation of the management approach	
GRI 419: Socioeconomic compliance 2016	419-1*	No file or penalty has been imposed on the Iberpapel Group.		Non-compliance with laws and regulations in the social and economic area	Group

\* Significant and binding fines or penalties (in contentious proceedings) (above €50,000) derived from sanctions or infringements (excluding administrative and tax proceedings) in which there is no opportunity to appeal and which are directly attributable to conducts or acts by companies or employees of the Iberpapel Group prior to 31 December 2021.

## APPENDIX III: CONTACT DATA OF IBERPAPEL'S DIVISIONS

GRI: 102-5, 102-53

### FORESTRY DIVISION

#### IBEREUCALIPTOS, S.A.U.

Reforestation and forestry

C/ Real, 14  
21700 La Palma del Condado  
Huelva. SPAIN  
Tel.: 959 40 22 85 | Fax: 959 40 26 33

#### IBERPAPEL ARGENTINA, S.A.

Reforestation and forestry

C/ General Urquiza, 137  
3280 Colón - Entre Ríos. ARGENTINA  
Tel.: 0054 344 742 1751 | Fax: 0054 344 742 1127

#### FORESTAL SANTA MARÍA, S.A.

Reforestation and forestry

C/ General Urquiza, 137  
3280 Colón - Entre Ríos. ARGENTINA  
Tel.: 0054 344 742 1751 | Fax: 0054 344 742 1127

#### FORESTAL LOMA ALTA, S.A.

Reforestation and forestry

C/ General Urquiza, 137  
3280 Colón - Entre Ríos. ARGENTINA  
Tel.: 0054 344 742 1751 | Fax: 0054 344 742 1127

#### FORESTAL LOS GURISES ENTRERRIANOS, S. A.

Reforestation and forestry

C/ General Urquiza, 137  
3280 Colón - Entre Ríos. ARGENTINA  
Tel.: 0054 344 742 1751 | Fax: 0054 344 742 1127

#### FORESTAL VONGER, S. A.

Reforestation and forestry

C/ General Urquiza, 137  
3280 Colón - Entre Ríos. ARGENTINA  
Tel.: 0054 344 742 1751 | Fax: 0054 344 742 1127

#### LOS EUCALIPTUS, S.A.

Reforestation and forestry

Otros Padron, 22  
2982 9370 Constancia - Paysandu. URUGUAY  
Tel.: 0059 829 030 138 | Fax: 0059 829 030 129

#### SAMAKIL, S.A.

Timber merchant

Camino Bajo de la Petiza  
4675 Montevideo. URUGUAY  
Tel.: 0059 829 030 138 | Fax: 0059 829 030 129

### INDUSTRIAL DIVISION

#### PAPELERA GUIPUZCOANA DE ZICUÑAGA, S.A.U.

Manufacture, transformation and sale of paper

Bº Zicuñaga s/n  
20120 Hernani, Guipúzcoa. ESPAÑA  
Tel.: 943 55 11 00 | Fax: 943 55 77 28

### COMMERCIAL DIVISION

#### DISTRIBUIDORA PAPELERA, S.A.U.

Paper wholesaler

C/ Velázquez, 105  
28006, Madrid. ESPAÑA  
Tel.: 91 564 87 16 | Fax: 91 564 97 16

#### MOLINER, DOMÍNGUEZ Y CÍA, S.A.U.

Paper wholesaler

C/ Francesc Layret, 52 portal 3 - planta 1º  
08912 Badalona, Barcelona. ESPAÑA  
Tel.: 93 462 04 47 | Fax: 93 462 04 36

#### CENTRAL DE SUMINISTROS DE ARTES GRÁFICAS PAPEL, S.A.U.

Paper wholesaler

C/ Velázquez, 105 - 28006, Madrid. SPAIN  
Tel.: 91 564 11 66 | Fax: 91 564 97 16

#### IBERBARNA PAPEL, S.A.U.

Paper wholesaler

C/ Francesc Layret, 52 portal 3 - planta 1º  
08912 Badalona, Barcelona. SPAIN  
Tel.: 93 462 04 47 | Fax: 93 462 04 36

#### ZICUPAP, S.A.U.

Export promotion

Avda. Sancho el Sabio, 2 -1º  
20010 San Sebastián, Guipúzcoa. SPAIN  
Tel.: 943 46 26 00 | Fax: 943 46 36 81

#### COPAIMEX, S.A.U.

Export promotion

Avda. Sancho el Sabio, 2 -1º  
20010 San Sebastián, Guipúzcoa. SPAIN  
Tel.: 943 46 26 00 | Fax: 943 46 36 81

#### IBERPAPEL ONLINE, S.L.U.

B2B paper marketing

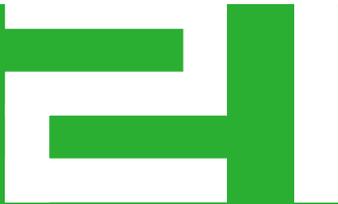
Avda. Sancho el Sabio, 2 -1º  
20010, San Sebastián, Guipúzcoa. SPAIN  
Tel.: 943 46 26 00 | Fax: 943 46 36 81



**[Red-crested cardinal**

*(Paroaria coronata).*

Also known as the common cardinal in Argentina and Uruguay, it nests in the properties sustainably managed by the Iberpapel Group in Argentina and Uruguay, helping to protect this bird's natural habitat].



*A great group of people*