



# INTEGRATED MANAGEMENT SYSTEM POLICY

M.00.00014 - V02



## 2 VISION

To be a reference partner in defining and implementing our customers' sustainable packaging roadmaps, thanks to a team fully committed to the company's Mission, Vision, and Values.  
 To be a reference in the development of new sustainable packaging projects.

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 2026/04/15

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### SCOPE OF THE POLICY

Design, development, production and marketing of packaging solutions.

# 1

## MISSION

A **reliable** partner for our customers throughout the process, from the definition of the tube packaging solution best suited to their functional and sustainable development needs, right through to delivery, while meeting demanding service levels and acting ethically and responsibly with each of our stakeholders.



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## VISION

To be a reference partner in defining and implementing our customers' sustainable packaging roadmaps, thanks to a team fully committed to the company's Mission, Vision, and Values.

To be a reference in the development of new sustainable packaging projects.



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## VALUES

At the **CTLpack** group, values are the foundation on which our entire policy is based.

Engage and involve people within these values, we believe is a key factor.

Consequently, the motivation and integration of our staff is a priority for the optimal functioning of **CTLpack** and the fulfilment of our Mission.

Thus, **CTLpack** will promote training for all staff across all areas defined in our policy and will provide the necessary resources to ensure its implementation.



### Value creation.

Seek the **efficiency** in operations working together to obtain the **greatest profit** to shareholders, focusing our efforts exclusively on actions that add value.

### Agility.

Ability to provide excellent customer service; this means **the ability to listen, understand their needs needs in order to satisfy them.**

### Leadership.

Ability to **lead, guide, align, inspire,** and **manage** people to achieve their professional goals.

### One Team.

Build a **cohesive and unified team** focus on achieving common goal.

### Commitment.

**Loyalty, reliance and accountability** of each employee to company's goals and objectives.

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## REQUIREMENTS

**CTLpack** aims to ensure compliance with customer requirements, as well as legal requirements and other voluntary requirements relating to environmental, health and safety, and social responsibility aspects.



### Legislation.

At the **CTLpack** Group, we establish the circuits to guarantee legal compliance within our activities

### Requirements of our Stakeholders.

In the **CTLpack** Group, we establish the circuits to understand the needs and expectations of our Stakeholders in order to meet the commitments made.

We focus primarily on our employees, customers and suppliers. We also take into account government bodies, consumers and other stakeholders.

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## CORPORATE SOCIAL RESPONSIBILITY

At the **CTLpack** Group, we view CSR as an **intrinsic and fundamental** part of our business.

**CTLpack** meets the **needs of the present** without compromising the **future of coming generations**, ensuring a balance between **economic** growth, respect for **the environment** and **social protection**.



**CTLpack** feels responsible for the impact of its decisions and activities on society and the environment.

We integrate environmental, social, labour, ethical and economic considerations into our activities and interactions with our stakeholders.

We build identity and distinction among customers, consumers and society.

**CTLpack** is committed to sustainable development in its strategy, based on several pillars.

- ◆ **Our Code of Ethics and Conduct**, which has the firm objective of establishing the guidelines, values and principles that must govern the behaviour of the organisation's staff in relation to the company's dealings with its stakeholders.
- ◆ **An organisation with a sense of corporate responsibility**. In line with this idea and to demonstrate its commitment to ESG (Environmental, Social and corporate Governance).
  - In 2014, we joined the Global Compact, supporting its 10 principles, as well as the Sustainable Development Goals (SDGs).
  - In 2017, we joined EcoVadis to assess and improve our sustainability performance.

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## CORPORATE SOCIAL RESPONSIBILITY

- In 2025, we joined Sedex to collaboratively manage social, ethical and environmental aspects, thereby enhancing our visibility and transparency with our stakeholders and, in particular, with our supply chain.
- ◆ Comprehensive and specific policies covering the following areas:
  - Responsible sourcing (procurement).
  - Anti-corruption, bribery and money laundering.
  - Conflicts of interest.
  - Ethical business conduct.
  - Information security.
  - Equality, diversity and inclusion.
  - Human rights, labour rights and HR.
  - Social action.
  - Quality.
  - Environment, including climate change, water, materials management, chemicals and biodiversity.
  - Health and Safety.

**CTLpack** communicates its policy throughout the organisation and incorporates it into induction programmes and regular training. Express acceptance of the Code of Ethics and this Policy will be a requirement for employment and continued service.

**CTLpack** has established a channel so that anyone can raise concerns, report incidents or report possible breaches through the channels set out in the Code of Ethics and Conduct:

- ◆ In person, to any member of the **CTLpack** Group Management Committee.
- ◆ Via the “Complaint – Code of Ethics” form, which can be deposited in a designated postbox either by name or anonymously.
- ◆ Via the reporting channel available on the **CTLpack** Group website.

The company prohibits any retaliation against anyone who reports in good faith and guarantees confidentiality and the presumption of innocence.

Reports will be investigated in accordance with internal procedures and applicable regulations, ensuring objectivity, confidentiality and the rights of those involved.

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Individuals who breach this policy, fail to exercise due diligence in detecting a breach, refuse to cooperate, or obstruct the investigation of potential breaches may be subject to disciplinary measures and legal sanctions.

The Group Management Committee develops the processes and tools necessary to comply with the principles, commitments and objectives established by this Policy: **it monitors the degree of compliance** with the commitments set out in the Code of Ethics and Conduct and in the Sustainability Policy, **reviews the Sustainability Policy**, ensuring its suitability and its focus on value creation, and **monitors the degree of achievement** of the sustainability strategy.

### 1 Responsible procurement.

This Responsible Procurement Policy sets out the principles, criteria and practices that guide the procurement of goods and services by **CTLpack**. Its aim is to ensure that all purchasing decisions are made in an ethical and sustainable manner, in line with corporate values, reducing risks and generating a positive impact on the community, the environment and the supply chain.

This policy applies to **all employees involved** in procurement, contracting or supplier management processes; all current and potential **suppliers** wishing to establish business relationships with **CTLpack**; and all **categories of goods, products and services**.

**CTLpack** is committed to this policy through the following principles of responsible procurement:

- ▶ **CTLpack** is committed to its own Code of Ethics and Conduct, as well as regulatory compliance: **conducting** transparent, competitive and non-discriminatory **procurement processes**, **complying** with all applicable laws and regulations (ethical, labour, tax, environmental, anti-corruption, etc.) and **preventing** bribery, conflicts of interest or other forms of corruption in relations with suppliers. It is prohibited to offer, give, solicit or receive charges or payments outside the scope of a contract or order.
- ▶ **CTLpack** encourages the procurement of sustainable products and services that **minimise environmental impact** throughout their life cycle, **reduce the use** of hazardous materials, emissions and waste, and **promote the circular economy**, recycling and energy efficiency.
- ▶ **CTLpack** particularly values suppliers that hold environmental certifications (ISO 14001, EMAS, FSC, etc.), Health and Safety certifications, CSR certifications, amongst others.
- ▶ **CTLpack** requires its suppliers to uphold social responsibility and human rights by complying with the Supplier Code of Conduct. Consequently, they must ensure safe and decent working conditions, respect human and labour rights—including the prohibition of child and forced labour— promote diversity, equal opportunities and inclusion, and comply with international standards such as OIT conventions or the UN Global Compact.
- ▶ **CTLpack** manages procurement risks: the selection of suppliers will take into account financial and reputational soundness, transparency in the supply chain, and the existence of compliance and sustainability policies.
- ▶ **CTLpack** selects and evaluates its suppliers based on criteria that include, in addition to price and without being limited to, the quality and reliability of the product or service, the compliance with local and international regulations, environmental impact and sustainable management, innovation and continuous improvement, and total cost of ownership.

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The organisation may request documentary evidence (certifications, audits, ESG reports, etc.) to verify compliance with these criteria.

- ▶ **CTLpack** promotes continuous improvement with suppliers by monitoring them through periodic assessments, business review meetings and, where necessary, follow-up measures involving supplier audits. **CTLpack** may suspend its business relationships in the event of non-compliance.
- ▶ **CTLpack** communicates its procurement policy to all staff involved in procurement processes, as well as to suppliers and business partners. Compliance is mandatory and forms an essential part of the organisation's corporate responsibility model.

### 2 Anti-corruption, bribery and money laundering.

**CTLpack** establishes the principles, standards and procedures to prevent, detect, investigate and respond to any form of bribery, corruption, fraud or money laundering in all its activities.

It is mandatory for all staff, management, temporary staff, interns, as well as third parties acting on behalf of or in the name of **CTLpack** (suppliers, agents, distributors and consultants).

**CTLpack** is committed to this policy through the following principles:

- ▶ Zero tolerance towards bribery, corruption, fraud and improper payments, both in the public sector (national and international) and in the private sector.
- ▶ Acting with integrity and honesty, and complying with the laws and regulations applicable in the countries where we operate.
- ▶ Prohibition on soliciting, offering, promising, giving or accepting any illegitimate advantage to influence business decisions.
- ▶ Express rejection of any attempt at extortion and an obligation to report it immediately through the established a channel to raise concerns.

**CTLpack** prohibits conduct such as:

- ▶ Offering, soliciting or accepting bribes or any illegitimate advantage, including facilitation payments, disguised donations or unjustified commissions.
- ▶ Making or recording payments outside of a contract or order, or maintaining unrecorded accounts, funds or transactions ("slush fund").
- ▶ Making payments in cash, by bearer cheques or transfers to accounts in high-risk jurisdictions without proper justification and approval.
- ▶ Using **CTLpack's** assets or resources for unlawful or personal purposes.
- ▶ Offering or accepting gifts that are disproportionate or contrary to customary practice, or that do not comply with the provisions of the Code of Ethics
- ▶ Financial contributions or donations of any kind to political parties.

All financial transactions must be duly authorised, documented and recorded truthfully and in full. **CTLpack** establishes specific controls over receipts and payments, paying particular attention to transactions that are unusual in nature or amount, and cash payments must be avoided in all cases. Any extraordinary payment must be reported and reviewed prior to execution.

**CTLpack** prohibits the use of transactions for the purposes of money laundering or illicit financing.

### 3 Conflict of interest.

**CTLpack** sets out guidelines for preventing, identifying and managing conflicts of interest within the **CTLpack** Group, in accordance with its Code of Ethics and Conduct, as well as for strengthening the criminal compliance system.

A conflict of interest is defined as any circumstance in which personal interests, whether direct or indirect, interfere with the responsible and ethical fulfilment of professional duties or involve an individual personally in the company's operations, or those of its customers or suppliers.

For example, the following are considered conflicts of interest: decisions regarding recruitment, remuneration or disciplinary measures affecting family members or persons with whom one has a close relationship; influence over the award, renewal or modification of commercial contracts; simultaneous participation in activities involving competitors, clients or suppliers...

This applies to all staff, management, temporary staff and interns, as well as to third parties acting on behalf of and in the name of the company.

**CTLpack** undertakes to act with loyalty, transparency and responsibility in all decisions, to avoid any situation in which personal interests interfere with those of the company, and to immediately declare any potential conflict through the established a channel to raise concerns.

**CTLpack** prohibits conduct such as **concealing** a known **conflict** of interest, **participating in decisions** that directly or indirectly benefit related parties or friends, or **engaging in external activities that compete** with **CTLpack** without authorisation from the C-Suite.

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**CTLpack** respects staff participation in activities outside the company provided they are carried out within the law and do not compete with responsibilities within the company, there is no conflict of interest, or they are not used as a means to engage in corrupt practices. In any case, individuals must report any actual or potential conflict to any member of the Group Management Committee, who will assess the risk and determine appropriate measures (e.g. abstention from decisions, reassignment of duties).

### 4 Ethical business conduct.

**CTLpack** Group's activities aim to deliver lasting and recurring value to our customers.

We seek to build business relationships based on trust and professional integrity.

This policy applies to everyone within the **CTLpack** Group.

**CTLpack** is committed to its policy of ethical business conduct through the following principles:

- ▶ To design, produce and market high-quality, safe, environmentally responsible and socially responsible products and services, with the aim of achieving customer satisfaction.
- ▶ To inform our customers in a truthful, rigorous, comprehensive, transparent and understandable manner about the characteristics of the product and/or service, particularly those relating to its environmental impact.
- ▶ Not to use misleading information in the marketing of products or services or in external corporate communications.
- ▶ Professional customer service, based on respect, dignified treatment and non-discrimination.
- ▶ Adapting **CTLpack**'s processes to the socio-cultural diversity inherent in working in international markets, whilst respecting local customs and traditions.
- ▶ Negotiate contract terms ethically, and comply with them in terms of performance, quality, deadlines, price, warranty and all other agreed conditions.
- ▶ Respecting our clients' privacy policies and the disclosure of confidential information.
- ▶ Reject commercial proposals that are not acceptable to **CTLpack**, either because we cannot deliver the highest quality or because they distort free competition by involving unregulated benefits, such as commissions, gifts or gratuities from the client.
- ▶ To comply with applicable national and international regulations in the conduct of our professional activities, avoiding any behaviour that involves restrictions or limitations on free competition.

### 5 Information security.

**CTLpack** is committed to maintaining and improving information security and business continuity within the current legislative framework. **CTLpack** is dedicated to ensuring the protection of all its information assets against internal or external threats, whether deliberate or accidental, whilst safeguarding their integrity, availability and confidentiality.

Failure to comply with obligations regarding confidentiality, secrecy and security in relation to personal data, trade secrets and information security jeopardises fundamental rights and trade secrets and may cause serious reputational and legal damage to the organisation.

**CTLpack** promotes an organisational culture focused on the protection of information assets, implements technical and organisational security measures appropriate to the level of risk, keeping them up to date, and ensures business continuity in the event of foreseeable security incidents.

This Policy applies to all **CTLpack** staff and external parties linked through service contracts or agreements with third parties.

**CTLpack** implements measures in accordance with current legislation and is committed to this policy through the following principles:

#### Information Security Guidelines:

- ▶ The information processed by **CTLpack** is **confidential** and **known exclusively** to authorised persons, subject to identification, at the appropriate time and through the authorised channels.
- ▶ Stakeholder information is **private and is managed with the utmost security**; it shall not be misused for personal gain or that of a third party.
- ▶ The information shall be **complete, accurate and valid**; its content may not be altered without authorisation.
- ▶ Information systems, devices and technological resources are the property of **CTLpack** and are subject to all acceptable use policies. They may only be used for professional purposes related to work activities.

#### Roles, Duties and Rights of Employees:

- ▶ All **CTLpack** staff who handle personal information or data must respect fundamental principles such as **honesty and legitimacy** (data shall be collected and processed lawfully, fairly and transparently), **use for specific purposes** (data shall only be processed for the purpose

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for which it was collected), **transparency** (information regarding the use and processing of your data), **data minimisation** (only the minimum amount of data necessary for the established purposes shall be processed), the **erasure, accuracy and updating** of personal data, and data **confidentiality and security**.

- ▶ It is expressly prohibited to obtain, disclose, communicate or use any information relating to **CTLpack** or its clients outside the workplace.
- ▶ The obligations of confidentiality and secrecy shall remain in force even after the employment or contractual relationship with the employee or contractor has ended.
- ▶ All staff have the right to digital disconnection and not to respond to work-related communications outside their working hours, except in duly justified emergencies.

### Information Systems Security Measures:

- ▶ Access to information systems is restricted to authorised users with the necessary permissions, and each user is responsible for all actions carried out using their credentials.
- ▶ Only software that has been authorised prior to installation and is legally licensed may be installed.
- ▶ Any suspected security incident (virus, unauthorised access, loss of device, data breach, etc.) must be reported immediately to the supervisor or the IT department. If malware is suspected, do not continue using the device and disconnect it from the network without switching it off.

### Data Protection Rights:

- ▶ **CTLpack** guarantees the exercise of the rights recognised by data protection regulations (GDPR) to all individuals whose data it processes.
- ▶ The right to obtain information regarding whether your personal data is being processed, the **right** to have inaccurate data corrected or incomplete data completed, **the right to erasure** (deletion) of data when it is no longer necessary, the right **to restrict** processing, **and** the right to object to processing based on legitimate interests or public interest.
- ▶ To exercise these rights, any interested party may contact the person in charge of the relevant department or send an email to [lopd@ctlpack.com](mailto:lopd@ctlpack.com).

## 6 Equality, diversity and inclusion.

**CTLpack** has established basic principles of conduct to guarantee equal treatment and opportunities, non-discrimination, and to promote and encourage measures to achieve genuine equality within our organisation, establishing equal opportunities between women and men as a strategic principle.

This policy applies to everyone at **CTLpack**.

**CTLpack** is committed to this policy through the following basic principles of action:

- ▶ To reject any direct or indirect discrimination on the grounds of any physical, personal and/or social condition.
- ▶ To ensure a working environment free from sexual, physical, psychological or mobbing harassment, verbal harassment, and/or cyberbullying, on the grounds of sex, sexual orientation, gender identity, gender expression, physical or intellectual abilities, origin, religious or political beliefs, age, academic level ... or any other set of traits and characteristics of individuals in their internal and external dimensions, as well as at the organisational level.
- ▶ To manage diversity in a cross-cutting manner across all **CTLpack** management policies, forming the basis for the company's decision-making and actions.
- ▶ Develop policies and processes for selection, recruitment, remuneration, working conditions, training, performance appraisal and promotion that guarantee equal opportunities within the **CTLpack** workforce.
- ▶ Provide flexible working arrangements to facilitate a balance between family, personal and working life.
- ▶ Specifically adapt workstations for people with disabilities to ensure their effective integration.
- ▶ Use gender-neutral and inclusive language in **CTLpack**'s internal and external communications.
- ▶ To promote a diverse team of professionals that reflects society, fostering an egalitarian and inclusive culture in a working environment based on collaboration and respect for people's dignity and their fundamental rights.
- ▶ Raise staff awareness of the principles of equality, diversity and inclusion, which are **CTLpack**'s core values.
- ▶ Extend the principles of equality, diversity and inclusion to our value chain through the supplier code of conduct.
- ▶ To contribute to the achievement of a society free from gender-based violence and, consequently, to the promotion of equality between women and men.

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- ▶ To establish specific objectives and actions to ensure the commitments set out in this policy are met.

**CTLpack**'s Equality Committee regularly monitors the degree of compliance with the commitments set out in this policy, reviewing it periodically to ensure its continued relevance and focus on value creation.

All stakeholders have access to a reporting channel for the identification and handling of potential or actual breaches of the principles of the equality, diversity and inclusion policy.

### 7 Human rights, labour rights and HR.

**CTLpack** establishes the basic principles of action regarding compliance with human and labour rights, based on the principles set out in the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, the ten principles of the Global Compact, the **CTLpack** Group Code of Ethics and Conduct, and **CTLpack**'s management policies.

The human rights, labour and HR policy is to be implemented by **CTLpack**'s management and staff at all sites where the company operates and is based on the following core principles:

- ▶ Respecting human rights, by applying a human rights due diligence process to identify, prevent, mitigate and account for how **CTLpack** addresses its impact on human rights.
- ▶ Reject corruption in all its forms, including extortion and bribery, applying a zero-tolerance policy towards malpractice.
- ▶ Promoting decent work, rejecting any form of so-called modern exploitation (child labour, forced labour, slavery or work in extreme conditions), and remunerating people based on their training, experience, responsibilities and duties, in accordance with applicable legislation and the socio-economic context. No person under the age of 18 may work at **CTLpack**.
- ▶ To ensure employment based on the principle of equality and inclusion, avoiding discriminatory conduct on the grounds of gender, age, disability, sexual, religious or political orientation, nationality, socio-economic status, health status or any other existing diversity variable.
- ▶ Guarantee the right to a maximum working day and rest periods for staff in accordance with applicable legislation.
- ▶ To safeguard occupational health and safety by ensuring a safe and healthy working environment in compliance with legislation and the commitments set out in **CTLpack**'s Occupational Health and Safety Policy.
- ▶ Respect freedom of association and the right to collective bargaining, as well as the exercise of trade union activities and the protection afforded to workers' representatives, in accordance with current legislation and ILO conventions.
- ▶ To guarantee the right to privacy, protecting and making appropriate use of the personal data of stakeholders. The official and original documents required for the recruitment of an individual may never be retained by **CTLpack**.
- ▶ To manage training, learning and continuous professional development at **CTLpack**, offering career and training opportunities that enable employees to achieve personal and professional growth.
- ▶ To foster a culture of respect for human and labour rights by communicating the content of this policy to all stakeholders and carrying out awareness-raising and training initiatives.
- ▶ To promote respect for human rights throughout the value chain, ensuring that the commitments set out in this policy are extended to suppliers and their staff.

All stakeholders have access to the due diligence process and whistleblowing channel for the identification and handling of potential or actual human rights violations.

### 8 Social action.

**CTLpack** has defined a Social Action Policy linked to its business strategy and derived from the commitments set out in the **CTLpack** Group's Code of Ethics and Conduct, generating shared value for all stakeholders.

The commitment to social needs and the creation of value for the local community is one of the key pillars of **CTLpack**'s Sustainability Policy and is based on the following principles of action:

- ▶ Activities carried out in the field of social action shall be governed by the principles of respect for human rights, transparency, adaptability and added value.
- ▶ Social action will primarily focus on the following areas, without prejudice to any others that may be considered:
  - Culture and inclusion in the workplace.
  - Education and access to employment

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- Collaborations with business and sectoral associations, etc.
- Collaboration with NGOs, associations, etc.
- ▶ We promote collaboration in activities that allow us to utilise our own capabilities, as well as in projects in which **CTLpack** professionals participate on a voluntary basis, always with transparency.
- ▶ All social initiatives undertaken outside **CTLpack** are reported annually to the company's stakeholders.
- ▶ During the implementation of social action projects, the HR team will closely monitor them, paying particular attention to the proper use of the contributions made by **CTLpack**.

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## QUALITY

Satisfying our customers' expectations.

- ▶ Excellence in service.
- ▶ Quality Compliance.
- ▶ "End-to-end" innovation.
- ▶ Proactive organization.

Meeting the expectations and requirements of our various stakeholders.



Our Quality Policy reflects our commitment to operational excellence and customer satisfaction, and is integrated with our environmental, Health and Safety, and corporate social responsibility policies to form a robust and effective Integrated Management System.

**CTLpack** works to fulfil its commitments to **service excellence, quality compliance, end-to-end innovation** and **proactive organisation** in accordance with the following principles:

- ◆ We **are customer-focused** to understand and anticipate their needs. We establish long-term collaborative relationships based on trust, transparency and the development of innovative solutions.
- ◆ We ensure **compliance with the specifications and services agreed** with our customers through the selection and management of our suppliers, as well as the control of raw materials, components, production processes, final product inspection and measurements using calibrated equipment. All of this **is carried out by applying good manufacturing practices** and the **traceability** of operations defined in the **CTLpack** Management System.
- ◆ **To design, develop and innovate** by integrating service, quality, functionality, sustainability and safety requirements from the earliest stages of designing new products and sustainable packaging solutions.

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## QUALITY

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- ◆ **Protecting the intellectual property** of our innovations and **respecting the confidentiality** of developments carried out with our clients.
- ◆ **To manage non-conformities** before they affect our customer through a robust system for the identification, documentation and management of non-conforming products. And, in the event of non-conformities detected by the customer, to streamline the management process to avoid causing harm to our customers
- ◆ Ensure the **competence, training and development of staff** involved in activities affecting quality and service.
- ◆ **To encourage the participation and commitment** of all staff to quality, establishing clear roles and responsibilities.

The management of **CTLpack** is committed to establishing, communicating and promoting a culture of quality and service throughout the organisation and to providing the necessary resources (human, technical and financial) to maintain and continuously improve the Quality Management System.

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# ENVIRONMENT

We are committed to protecting the environment by preventing contamination and reducing environmental impacts.

To comply with our environmental policies:

- ▶ We engage with and assess **our suppliers'** environmental commitment.
- ▶ **We train**, assess and raise awareness among our **staff**.
- ▶ We engage our customers and all our **stakeholders** to achieve our objectives.
- ▶ We monitor, assess, implement and comply with **legislation**.

In environmental terms, several policies have been defined covering the following areas:

- ▶ Climate action.
- ▶ Water.
- ▶ Materials, chemicals and waste.
- ▶ Biodiversity.



## 1 Climate action.

**CTLpack** is committed to combating climate change by integrating it into its strategy and building on several pillars.

- ◆ Maintaining its certified environmental management system based on ISO 14001 standards for the assessment, analysis, management and reduction of environmental risks, as well as for the optimisation of resource management and investments.
- ◆ Assessing its climate commitment via the CDP (Carbon Disclosure Project) assessment, which enables the evaluation of risks and opportunities, and the measurement, management and disclosure of climate impacts.
- ◆ Measure the carbon footprint of its operations annually, taking into account Scopes 1, 2 and 3, in order to make decisions and prioritise actions with the aim of contributing to global decarbonisation and aligning with the objectives of the Paris Agreement.
- ◆ Design new products and processes taking into account their life-cycle impact.

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- ◆ Select more sustainable raw materials; we take the life cycle into account in the development and design of our products and processes to improve the end-of-life of our own products.
- ◆ Gradually replace technologies with more efficient ones that are less intensive in greenhouse gas emissions.

## 2 Water.

**CTLpack** is committed to optimised water management, integrating it into its strategy across all its activities.

As water is a scarce, irreplaceable and essential resource that is being affected by climate change, **CTLpack** acts to fulfil its commitment to responsible and efficient water management in accordance with the following principles:

- ◆ Comply with legal and regulatory requirements, assessing and managing water-related risks.
- ◆ Prevent water pollution by reducing discharges and minimising changes to water quality.
- ◆ Take water management into account when assessing environmental aspects and improve water management if it is a significant issue, by setting targets and taking action.
- ◆ Use and treat water in an environmentally sustainable and economically beneficial manner.
- ◆ Manage water resources efficiently, preserving them and preventing their pollution and wastage.
- ◆ Support innovations that promote the efficient use of water.
- ◆ Monitor water consumption indicators annually to prevent any drift in usage.
- ◆ Raise awareness among **CTLpack** staff regarding the importance of responsible practices in efficient water management.

## 3 Materials, chemicals and waste management

**CTLpack** is committed to optimising the management of materials, chemical use and waste management, integrating this into its strategy through its activities.

**CTLpack** acts to fulfil its commitment to the responsible and efficient management of these elements in accordance with the following principles:

- ◆ Comply with legal and regulatory requirements, assessing and managing risks associated with these elements.



# ENVIRONMENT

- ◆ Selecting and sourcing more sustainable materials and chemicals for the manufacture of our products, for use in our manufacturing processes, and to protect the health of people working at our facilities.
- ◆ To use materials and chemicals sustainably in the course of our activities, helping to reduce the waste that may be generated, minimising adverse impacts and promoting people's health.
- ◆ Take action to prevent and mitigate the impacts caused, working to reduce the consumption of materials and chemicals, as well as to increase the use of reused and recycled materials.
- ◆ To establish the necessary measures to prevent and minimise waste generation, giving priority to repair, followed by recycling via source separation points for subsequent use, or finally recovery before disposal.
- ◆ Work with authorised waste management operators to ensure optimal treatment and disposal.
- ◆ Raise awareness and train staff working at our facilities on the procedures for managing materials, chemicals and waste.

## 4 Biodiversity.

**CTLpack** is committed to the protection, conservation and promotion of biodiversity within the scope of our activities and relationships with stakeholders.

We recognise the importance of biodiversity as a fundamental value for environmental sustainability and the well-being of present and future generations.

**CTLpack** acts to fulfil its commitment to biodiversity by applying the following principles:

- ◆ Comply with current environmental laws and regulations relating to biodiversity and environmental management.
- ◆ Identify and assess the potential impacts of our activities on biodiversity, adopting preventive and corrective measures to prevent or minimise them.
- ◆ Optimise the use of natural resources, prioritising energy efficiency, the circular economy and waste reduction through the sustainable use of resources.
- ◆ Promote the conservation of native flora and fauna in the vicinity of our facilities. We prevent habitat degradation.

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- ◆ Support technological and research initiatives that help reduce our environmental impact and promote innovative solutions for biodiversity conservation.
- ◆ We measure our impact on biodiversity through indicators relating to emissions, waste management, pollutant emissions and air pollution.
- ◆ We publish regular progress reports via the Global Compact channel, where we communicate the progress and results achieved in environmental and biodiversity management, fostering transparency with our stakeholders.

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## HEALTH AND SAFETY

At **CTLpack** Group, we base our health and safety policy on an organizational culture and a work environment where prevention and safety are the main priority. We strive to reduce risks in all our processes and provide safe and healthy working conditions, eliminating or reducing hazards and preventing injuries or other health related complications at work.



**CTLpack** is committed to ensuring the protection of the Health and Safety of all stakeholders who carry out their activities on the company's premises, who participate in activities related to our organisation, or who use products manufactured by **CTLpack**.

**CTLpack** acts to fulfil this commitment by applying the following principles:

- ◆ Comply with current legal and regulatory Health and Safety requirements.
- ◆ Maintain its Health and Safety management system certified to ISO 45001 standards for the assessment, analysis, elimination, reduction and management of health and safety risks, as well as for the optimisation of resource and investment management.
- ◆ To hold all members of the organisation, and particularly the line management, accountable so that they act as agents for the health and safety of those carrying out work for the **CTLpack** Group.
- ◆ To involve employees, consult them and encourage their participation in Health and Safety committees so that they can report any risk or incident that may compromise safety within the organisation and promote healthy habits.

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## HEALTH AND SAFETY

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- ◆ Invest in establishing, developing and maintaining a culture of health and wellbeing within the company, as a key tool for ensuring a healthy and supportive environment.
- ◆ To provide employees with personal protective equipment, ergonomic workstations, and safe machinery and processes that are regularly inspected to ensure they meet safety standards.
- ◆ Ensure that fire safety equipment is always in working order and that the emergency plan is updated regularly.
- ◆ In the event of incidents, investigate them in accordance with our protocols to prevent their recurrence and avert other potential incidents.
- ◆ For chemical products, make the relevant safety data sheets available to every worker and, where necessary, provide appropriate protective equipment in accordance with the risks associated with the use of such chemicals.
- ◆ Design our products to ensure their production, packaging and distribution are safe for our people and our customers.
- ◆ To promote the physical, social and emotional well-being of our people to ensure they perform their duties effectively both within and outside the organisation.
- ◆ Continuously train in Health and Safety and promote general well-being to meet the objectives set for workplace safety.
- ◆ Take into account legislative requirements and those of our customers to ensure our products are safe for consumers.

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## CONTINUOUS IMPROVEMENT

At the **CTLpack** Group we rely on continuous improvement, following different policies to achieve our objectives and vision.

We transform the error into an opportunity for improvement, we promote the generation of solutions, to avoid repetition and with involvement of our stakeholders.



To increase our competitiveness and secure our future and that of future generations, **CTLpack** establishes the following elements for continuous improvement, the setting of new objectives and improvement actions:

- ◆ Regular **reviews of policies** and monitoring of the degree of compliance with commitments made to ensure their continued suitability and focus on value creation.
- ◆ Monitoring through relevant **indicators** to check compliance with policies and help identify flaws in the management system for subsequent improvement.
- ◆ **Root cause analysis** in the event of product or service non-conformities or failure to meet the expectations of our stakeholders.
- ◆ Encouraging **consultation with employees** to take into account potential improvements to the Management Systems.
- ◆ **Measuring the satisfaction** of our customers and key stakeholders to respond proactively to their feedback and changing requirements.
- ◆ We carry out regular internal **audits** across all areas. We welcome external inspections and audits, both from certification bodies and from our clients, which help us to improve in terms

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## CONTINUOUS IMPROVEMENT

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of quality, the environment, health and safety, social responsibility, and any other area that affects us.

- ◆ **The communication** and reporting **channels** made available for the reporting of potential or actual breaches of commitments to the stated policies.

This Policy comes into force on the day of its publication and internal dissemination to all **CTLpack** staff and shall remain in force until such time as its amendment or repeal is communicated.

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## SCOPE OF THE POLICY

Design, development, production and marketing of packaging solutions.



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