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### 01.1 CEO MESSAGE



In 2022, AMB demonstrated its resilience as we overcame a challenging economic environment, with the lingering effects of Covid restrictions and the prolonged war in Ukraine magnifying macro headwinds. This led to significant and unprecedented market volatility:

- Inflation and raw material shortages have rapidly increased across all categories. Gas and electricity prices rose by more than 300%
- labour market has faced significant challenges with the so-called "great resignation" bringing turnover to levels that have never been seen before
- ) unpredictable increases to logistics and transportation costs

However, positively for AMB, market demand was good, and we were able to overcome these difficulties and complexities to fulfill customer expectations.

Soon after the investment of a new extrusion line in Italy, in 2022 we were still able to install a new extrusion line in our UK facility to align our capacity with market demand. AMB Group annual sales rose more than 30% from the previous year.

Despite the challenging market conditions, we have enhanced our commitments to environmental sustainability.

Several "green" projects have been implemented to integrate sustainability into AMB's daily business culture and processes. We are proud to be the first



business in the packaging sector to enter its products in the Environmental Product Declaration (EPD) program. EPD shows our commitment to measuring and reducing the environmental impact of our products and clearly reporting the results to help consumers make sustainable choices.

Furthermore, we have started our **Carbon footprint calculation**. The mapping shows that indirect emissions (GHG Scope 3) from purchased goods, transportation, packaging, and end-of-life account for almost 94% of our total emissions. It is our priority to reduce these emissions to increase our contribution against **climate change.** 

One of the most important pillar in our ESG strategy is the use of recycled material. AMB has more than fifteen years of experience in recyced PET extrusion with a capability to reach up to 100% post consumer recycled PET (PCR). In 2022 we used 39% post consumer recycled (PCR) PET, value that would be much higher if recycled PET demand was higher. The problem of this slowly market trend was that reycled material was more cost expensive than virgin

raw material. Despite of raw material inflation, our aim was to gurantee a minimum 30% of PRC in all our PET portfolio products by 2025 with the new minimum target of 50% by 2030.

We've launched our "TrayRevive" project to address PET tray recyclability, aiming for a closed-loop product lifecycle.

This year we are publishing our second sustainability report to record all of our ESG goals, achievements and activities. The report is a great tool to describe the foundations of our sustainability strategy where technological innovation, packaging recyclability improvements, and investments in human capital are key factors.

All these achievements have been possible because of AMB's team commitment, driven by **great people, passionate** about their company and with rigorous attention to all environmental sustainability matters.

Stefano Rosa Uliana, CEO of AMB



### 01.2 ESG HIGHLIGHTS 2022

IMPROVE PACKAGING F	RECYCLABILITY AND CIRCU	ΙΔΡΙΤΥ	
Improve packaging recyclability	Innovation projects driving sustainability by 2025	93%	innovation projects driving sustainability
and circularity	Attention to product life cycle	2	EPD studies published
Reduce the use of natural resources;	Min. 30% PCR until 2025 (including trays)	20%	PCR
promote materials with less environmental impact	Min. 50% PCR by 2030 (including trays)		PCR (including trays)
DEVELOPING ENVIRON	MENTAL, SUSTAINABLE AN	ND ECONOMI	C PROCESSES
Careful internal waste management	Reduce waste going to disposal	83%	non-dangerous waste diverted from disposal
Energy and emissions efficiency	Scope 3 measurement and corporate carbon footprint calculation		first carbon footprint measurement
	Emissions avoided by using 109	9,606 t	emissions avoided by using recycled

PEOPLE PEOPLE		
Improve employees' well-being and work spaces		developed a new onboarding program that includes sustainability topics
Skills and talent development		developed a new performance management model for professional development
	2,440	total hours of training
Diversity & inclusion (women)	18%	women on total employees
Progress toward zero time lost from accidents; promote a health and safety work environment	-43%	reduction injury rate in the last 24 months.
	Improve employees' well-being and work spaces  Skills and talent development  Diversity & inclusion (women)  Progress toward zero time lost from accidents; promote a health and	Improve employees' well-being and work spaces  Skills and talent development  2,440  Diversity & inclusion (women)  Progress toward zero time lost from accidents; promote a health and  -43%

Customer retention and satisfaction	Strengthen customer relations by improving delivery service and quality performance	90%	OTP (On Time Performance)
Product quality and safety	Guarantee safety and product quality	0%	quality and food safety accidents (resulting in a fine, penalty or warning)
PROMOTING AND EN	SURING BUSINESS ETHICS		
Business ethics and management of regulatory environment	Ensure responsible business conduct. (Including anti-corruption)	0%	no corruption incidents, or socioeconomic or environmental fines
	Sustainable supply chain		developed AMB Supply Chain Code of Conduct

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**02.1** AMB Overview

**02.2** AMB in a Nutshell

**02.3** AMB Milestones

**02.4** Operations and Markets



# O2.1 AMB OVERVIEW

AMB is an international company and leader in PET film production for food industries.

### PET is not just any plastic, it is one of the most sustainable, recyclable and circular materials.

PET's key technical advantages: transparency, safety, versatility, durability, and cost-competitiveness.

The only recycled plastic material with an established food supply chain (the only recycled plastic considered a suitable technology for food contact application).

From packaging design through to film production, printing, and lamination, AMB provides a full range of products to meet both customers' sustainability commitments, food packaging requirements and shelf life performance.

In a world where protecting the environment and building a sustainable circular economy has become more important than ever, AMB is actively engaged to meet the expectations of its customers and to solve the most complex sustainability challenges within the packaging industry.

Every action and project delivered by AMB is based on labour and environmental protection, safeguarding the interest of AMB's stakeholders and creating value for them.

#### **RIGID FILMS**

We produce sustainable rigid PET films for modified atmosphere packaging with improved sealing and barriers to ensure food safety and extended shelf life. Our rigid film is available in both multilayer and mono layer specifications and can contain up to 100% recycled materials.

#### **FLEXIBLE FILMS**

AMB produces flexible films for all requirements: protection from light, variable levels of peelability, anti-fog, and high gas barrier, with maximum flatness and suitability for contact with food.

#### PRINTING & LAMINATION

Our unique eco-friendly flexographic 8 colour water-based printing facility, combined with our lamination capability, enables us to design and print both rigid and flexible materials to high specifications, ensuring maximised shelf appeal and functionality for final packaging.

#### DESIGN, PROTOTYPING, TOOLING

AMB supports its customers in developing innovative and sustainable pack formats based on technical insight and efficiently engineered for fully automated packaging processes.



# 02.2 AMB INANUTSHELL



2 production plants in **Italy** 

1 production site in **UK** 

1 toolshop **UK** 



22 production lines



Super-clean recycling processes for recycled plastic with direct food contact



446 people in 2022



F40 countries supplied



### 02.3 MILESTONES

1982

coextrusion

machine.

First blown film

1969

Company founded.

1988

The first multi-layer cast coextrusion line for food packaging applications.

First 8-colour printer.

First solventless

laminator.

1997

2005

First cast coextrusion line using post-consumer recycled PET.

998

Certification

ISO 9001:2015.

2008

First cast extrusion line using 90% post-consumer recycled PET.

> AMB becomes the first company in Europe to start water-based production.

2019

AMB acquired TDX (Europe) Limited. This created a complete food packaging solution with a one-supplier relationship for all customers.

2017

Opening of second production plant in Italy, Amaro.

an affiliate of Peak Rock Capital. A new cast extrusion line is installed in Italy.

2021

AMB receives an

investment from

2016

2014

The new 9-layer blown film extruder is installed.

2006

Expansion of Italy San Daniele plants. 2018

Super clean recycling technology to produce 100% recycled PET in direct contact with food.

AMB acquired PTS Verpackungen, Bavaria (Germany). The second print line in Italy. A new extrusion line in the UK. 2022

AMB Tray Revive launched to utilize post-consumer trays and close the loop of PET trays.

New cast extrusion line installed in the UK.

AMB become the first company in its sector to present products with an Environmental Product Declaration (EPD).



## 02.4 OPERATIONS AND MARKETS

AMB's directly controlled operations are located in Italy and the UK:

- Headquarters and production: San Daniele del Friuli, province of Udine in Italy
- Production: Amaro, Italy and Gateshead, UK
- Design & Tooling Centre: Gateshead, UK

We have internal and external sales representatives in the UK and Italy as well as Germany, Spain, France, Poland, Sweden and Benelux. This network allows us to be close to our customers and respond quickly to their product design and supply needs.

AMB primarily serves the food packaging industry, with a recent expansion into the Medical and Dairy sectors.

#### **PRODUCT RANGE**

#### AMB BASE FILM DESIGNED FOR RECYCLING

- Mono APET
- Mono APET HB
- Sealpet +
- PE thermoformable with/without barrier

#### AMB BASE FILM STANDARD

- APET Low Temperature
- APET/PE with/without barrier
- Ecoform

#### AMB TOP FILM DESIGNED FOR RECYCLING

- Top Film mono PE universal sealing, with/without barrier
- Top Film mono PE with/without barrier
- Top Film multilayer Paper with/without barrier
- Top Film mono PET peel with/without barrier
- Top Film mono PET lock with/without

#### AMB TOP FILM STANDARD

- Top Film PE peel with/without barrier
- Top Film PE lock with/without barrier
- Top Film PE reclose with/without barrier

#### AMB FLOWPACK DESIGNED FOR RECYCLING

- OPP/PP
- Flowpack Film mono PE with/without barrier
- Flowpack Film mono PE triplex with/without barrier

#### AMB FLOWPACK STANDARD

- Flowpack triplex OPET based
- Flowpack triplex Paper based with/without barrier
- OPET/PE with/without barrier
- OPA/PE with/without barrier
- OPP/PE with/without barrier

#### AMB PRINTING CAPABILITIES

- Water-based printing
- Heat resistance external
- Matt external
- Paper touch matt external
- Paper touch glossy external
- Antifog internal
- Heat seal internal
- Cold seal internal
- Silicon (only rigid)





# 03.1 SUSTAINABILITY STRATEGY

AMB's sustainability strategy addresses some global and European challenges: the UN's Sustainable Development Goals (SDGs) of the Agenda 2030 and the EU's Circular Economy Action Plan of the Green Deal.

With our first sustainability report published in 2021, AMB began outlining a sustainability journey that would be guided by facts and data. Only by measuring our environmental, social and governance performance we can analyse, improve and monitor the objectives of our sustainability strategy.

Sustainability for us is a well-defined path with clear and defined topics, commitments and objectives summarized in six pillars.

#### **6 ESG PILLARS**

#### **ENVIRONMENTAL**

- 1. Improving packaging recyclability & circularity
- 2. Developing environmental, sustainable and economic processes

#### **SOCIAL**

- **3.** Taking care of AMB's people
- 4. Supporting value creation & local communities

#### **GOVERNANCE**

- **5.** Promoting and ensuring Business Ethics
- 6. Investing in innovation and digitalization

Each pillar is associated with one or more material topics which are measured by specific key performance indicators outlined in this report.

**AMB improves packaging recyclability** through ecodesign to trigger a virtuous product life cycle and to minimize its environmental impact.

We are part of the main EU associations promoting sustainability initiatives of the packaging industry and developing harmonized criteria and methodology. A recyclable design packaging does not ensure that it will actually be recycled, it is necessary to establish

common practices and recyclability criteria based on the state-of-the-art collection, sorting and recycling processes and infrastructure.

AMB is committed to progressively replace virgin materials with recycled ones to contribute to the transition to a circular economy.

The trayREVIVE is our key project to promote a close loop of packaging recyclability: recycled PET tray to be a "new" PET tray.

**Environamental, sustainable and economic processes** means products and operations that are both environmentally friendly and economically suistainable.

AMB is fully committed to provide sustainable solutions to support our business over the coming years and to ensure that the world will be a better place for future generations. We carefully use resources, reduce waste and implement energy efficiency projects to minimise our impact on climate change.

AMB believes how important is **to take care of our employees** by constantly improving health and

safety in our workplaces and promoting diversity and inclusion of minority groups. We offer professional growth opportunities by offering training courses that develop professional and soft skills.

We continue to **create value** for our customers by producing quality products and providing services to satisfy **our customers' expectations.** 

**AMB actively supports local communities** by initiatives for people in difficulty and charity programs.

**AMB advances innovation** through joint research projects with business partners and universities.

AMB promotes **responsible supply chains** and improved traceability with digital product passport and data security. AMB carries out its business with full respect for the law, internal regulations, and **business ethics**.

### 03.2 SUSTAINABILITY PATH





























The Sustainability Path 2022, approved by AMB's Board of Directors comprises of:

6 ESG pillars

10 Material topics

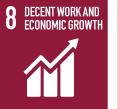
15 ESG commitments

Objectives to be achieved in the short, medium and long-term

The objectives also contribute to the achievements of the seven SDGs that AMB has recognized as significant for its business and in line with its strategic direction.







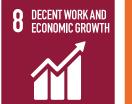






















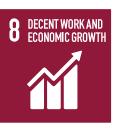








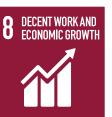




MATERIAL TOPIC	COMMITMENT	OBJECTIVES/TARGETS	TARGET	TIMETABLE (END OF)	STATUS	
IMPROVE PACKAGING RECYCLABILITY AND CIRCULARITY						
Circularity, eco-design and attention to product life cycles	Improve packaging recyclability and circularity	All of AMB's products will be designed for recycling or/have an alternative solution designed to be recyclable	100%	2030	New objective	
Foo friendly now motorials	Reduce the use of natural resources;	Min. 30% PCR until 2025 (including trays)	30%	2022 (2025)	Achieved	
Eco-friendly raw materials	promote materials with less environmental impact	Min. 50% PCR by 2030 (including trays)	50%	2030	New objective	
DEVELOPING ENVIRONMENTAL, S	SUSTAINABLE AND ECONOMIC PROCESSES					
Careful internal waste management	Prioritize recycling over landfill	Reduce waste going to disposal improving waste separate collection in our divisions	100% non-dangerous waste diverted from disposal	2025	New commitment	
Careful internal water management	Careful water management	Measure our impact on water consumption		2022	New material topic	
Energy and emissions efficiency	Implementation of projects to improve energy efficiency and reduce GHG emissions	Scope 3 measurement and corporate carbon footprint calculation		2023	On track	
		Complete the replacement of existing fluorescent lights with LED lighting	UK and IT units	2023	On track	
TAKING CARE OF AMB PEOPLE						
Employment, diversity and skill development	Improve employees' well-being and work spaces	Implemented a new onboarding program that includes sustainability topics		2023	New commitment	
	Skills and talent development	Developed a new performance management model for professional development		2023	New commitment	
Occupational health, safety and well-being	Progress toward zero time lost accidents; promote a health and safety work environment	Obtain ISO 45001		2024	New commitment	





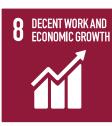






















MATERIAL TOPIC	COMMITMENT	OBJECTIVES/TARGETS	TARGET	TIMETABLE (END OF)	STATUS	
SUPPORTING VALUE CREATION AND LOCAL COMMUNITIES						
Customer satisfaction	Improve logistic and delivery performance	Develop at least one project to improve OTIF (on time in full)	At least 95% OTP (On Time Performance)	2025	On track	
Product quality and safety	Guarantee safety and product quality	Zero quality and food safety accidents (resulting in a fine, penalty or warning)	0%	2022	Achieved	
PROMOTING AND ENSURING BUSI	NESS ETHICS					
Business ethics and management of regulatory environment	Ensure responsible business conduct (Including anti-corruption)	Zero corruption incidents, or socioeconomic or environmental fines	0%	2022	Achieved	
	Sustainable supply chain	Draft AMB Supply Chain Code of Conduct		2022	Achieved	
RELEVANT TOPIC	COMMITMENT	OBJECTIVES/TARGETS	TARGET	TIMETABLE (END OF)	STATUS	
INVEST IN INNOVATION AND DIGIT	ALISATION					
	Strengthen R&D and business development	Upgrade the R&D laboratory		2023	On track	
Innovation and digitalization	Data and information protection	Guarantee protection of computer systems and data; develop cyber-security strategy for products and services	Implementation of SIEM (Security Information Event Management) Review manufacturing and laboratory electronic systems to isolate untrusted environments from the Company's network. New onboarding cybersecurity training for newcomers	2023	On track	
	Collaboration with universities and research institutes to develop new innovative solutions for products and processes	Increase competitiveness, attract young talent and enhance new business areas, support research with AMB industrial experience.	At least one project/year	2022	Achieved	

# 03.3 SUSTAINABILITY GOVERNANCE

To ensure that the sustainability objectives are achieved, AMB in 2022 established a Sustainability Governance structure, which consists of:

### **SUSTAINABILITY GOVERNANCE** BOARD OF DIRECTORS ESG Committee Leadership **Team** Group ESG Manager **ESG Executive Team** Improving packaging recyclability & circularity **ENVIRONMENTAL** Developing environmental sustainable and economic processes Taking care of AMB's people (3) **SOCIAL** Supporting value creation & local communities Promoting and ensuring Business Ethics **GOVERNANCE** Investing in innovation

and digitalization

#### **ESG Committee:**

It includes the Group ESG manager and the rest of the Leadership Team.

To accelerate decision making, the committee meets monthly and reports progress to the Group Management Team and Board of Directors monthly.

The ESG Committee is supported by ESG Executive Team focused on the six main ESG pillars.

#### **ESG Executive Team:**

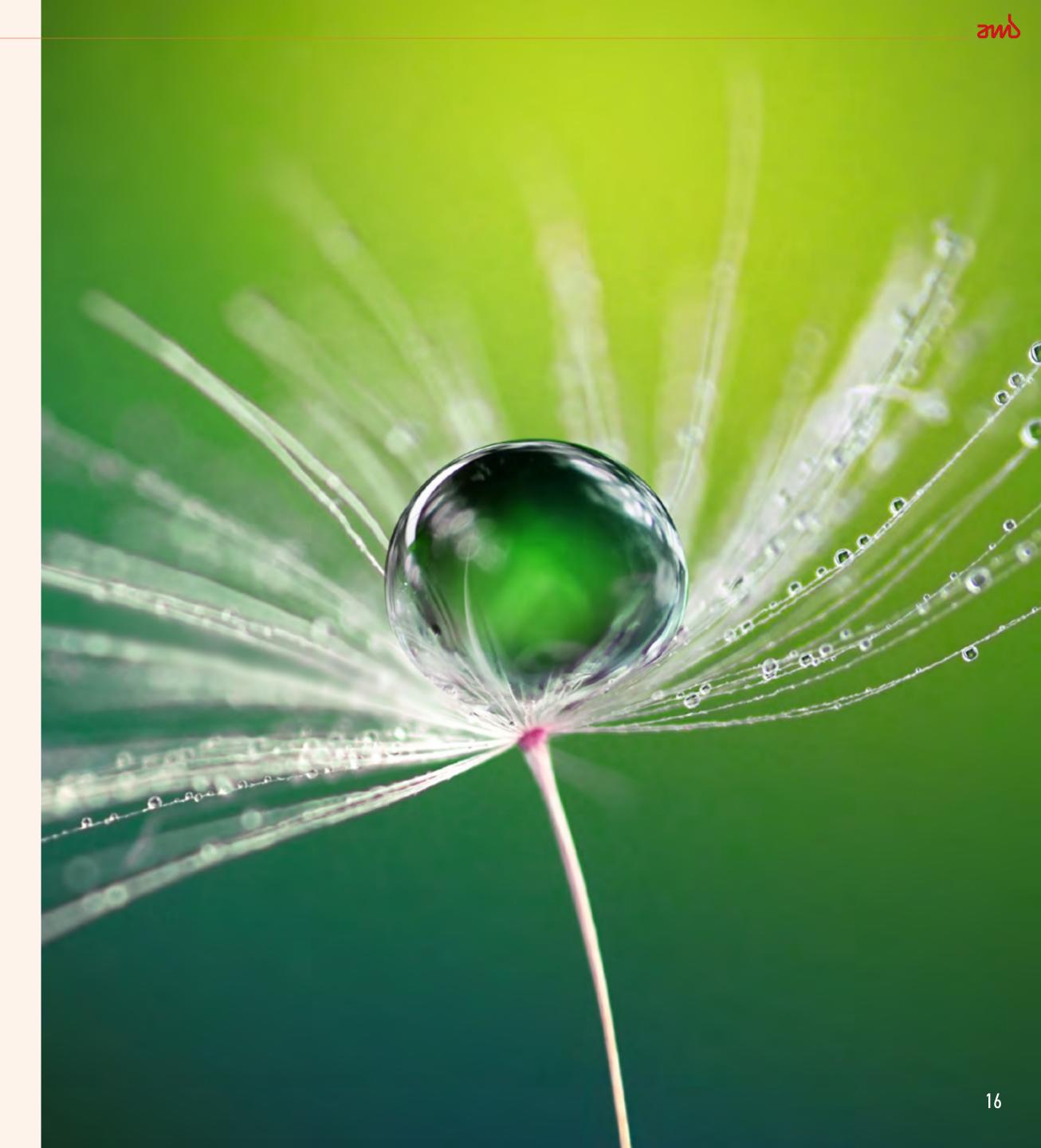
It includes our relevant internal stakeholders and is chaired by the Group ESG Manager.

The ESG Committee is accountable for:

- **)** the sustainable strategy
- sustainability initiatives performances

The ESG Executive Team is responsible for KPIs data that must comply with GRI standards reporting principles.

The ESG Executive Team meets and reports monthly to the group ESG manager for short ESG actions; meets and reports quarterly to the full ESG committee for full ESG actions.





## 03.4 STAKEHOLDERS AND VALUE CHAIN

In 2021 AMB mapped out its stakeholders to identify the main "entities" or individuals that can reasonably be expected to be significantly affected by its activities, products and services, or whose actions can reasonably be expected to affect AMB's ability to successfully implement its strategies and achieve its objectives (GRI Standards).

For each group of stakeholders, we have identified how best to listen and understand their expectations and needs. Specific departments within AMB constantly engage with their specific stakeholders.

Constant collaboration with all stakeholders is very important to achieve sustainability objectives across the value chain and achieving the objectives in the **European Commission's Green Deal and Circular Economy Action Plan**. These targets include more sustainable finance (Sustainable Finance Action Plan), more sustainable products, and reduction waste. The aim is to fight climate change, with the last one of these categories aiming for carbon neutrality by 2050.

The Sustainable Financial Action Plan recommends ten actions to be taken at the European level to:
(I) channel financial investment towards a more sustainable economy; (II) consider sustainability in risk management procedures and (III) enhance transparency and long-term investment.

#### **GRI 102-42: IDENTIFYING AND SELECTING STAKEHOLDERS**

STAKEHOLDER GROUP	EXAMPLES OF SUBJECTS
Employees	Employees, temporary employees, managers, and controllers.
Suppliers	Raw materials and input process suppliers, service companies, consultants, insurance companies.
Recycling companies	Suppliers of recycled raw materials.
Customers	Brand owners, thermoformers, medical device companies.
Retailers & End-users	Food retailers and food goods end-users.
Media/Press/Testimonials	Newspaper, webpress, social network, radio, television, testimonials.
Financial institutions	Shareholders, banks.
Governments, regulators and control bodies	Authorities, institutions, regulators, control bodies.
Local communities and NGOs	Social and environment associations, local communities, schools and universities, NGOs.
Industry Associations	Public or private associations related to the plastic industry.

AMB's suppliers are crucial partners, especially our raw materials/goods suppliers who are an essential part of establishing circularity in the production process. Because of the critical role suppliers play, AMB carefully assesses them through an initial evaluation questionnaire that focuses on quality certifications, quality and process control, and environmental and social efforts. A supplier monitor program evaluates their performance and reviews any instances of noncompliance. For strategic raw materials suppliers, an on-site audit ensures their reliability.

In 2022 AMB drafted the AMB Supply Chain Code of Conduct that is aligned with the AMB Code of Conduct. These documents ensure that all business partners, suppliers, and manufacturers meet AMB's basic expectations in regard to legal requirements, ethical practices, human rights, and environmental management. AMB's sustainability strategy supports all activities addressed at closing the loop and moving the EU action plan for the Circular Economy forward.









#### greenweek

#### festival della green economy

Tour Le Fabbriche della Sostenibilità 7-9 giugno 2022

Parma Festival della Green Economy 10-12 giugno 2022

programma aggiornato greenweekfestival.it



In 2022 AMB participated in the Green Week festival on the green economy.

The 2022 edition of Green Week took place in Parma with more than 50 sustainable companies and more than 300 speakers, among them business owners, economists, institutional figures, and Nobel prizes. The Green Economy Festival focused on translating visions of the future into concrete policies and industrial development projects. The aim of the festival is to contribute to technological transitions that satisfy customers' needs, as well as the environment and society at large.

AMB took part in two events: "The sustainability companies tour" and "Less is more: Sustainable packaging". More than 30 students from the best Italian universities attended our company's workshops regarding sustainable issues and packaging recyclability challenges.



#### **MEMBERSHIPS**

Sustainable development requires collaboration with strategic organizations. That's why AMB has undertaken a series of voluntary commitments to sector working groups.



















# 03.5 MATERIALITY ANALYSIS

In line with the updates of the new GRI Standards 2021 and considering the guidelines drafted in the GRI 3 - Material topics, AMB carried out a new analysis of its material topics in 2022.

The analysis sought to identify the areas most or potentially impacted by the Group's activities. The process was coordinated by the ESG manager involving AMB's key functions, and supervised and validated by the Senior Management.

The materiality analysis update was structured as follows:

- Analysis of the appropriateness of the 2021 material topics;
- Analysis of the context in which AMB operates to identify potentially relevant impacts for the Company at entity and sector level;
- Qualitative assessment of the current, potential, positive or negative impacts that AMB generates or could generate for its stakeholders, as well as for the environment, its business sector, and society at large. The analysis involved the engagement of the internal stakeholders, such as AMB's Senior Management, ESG Executive Team and ESG Committee;
- Quantitative assessment of the identified impacts. The negative impacts were evaluated in terms of scales of severity and likelihood, whereas positive impacts were assessed considering the generated benefits and the likelihood of occurrence.
- Analysis of the data resulted in a list of 37 priority impacts that was narrowed down to a short-list of 10 material topics for the Company.





ESG AREA	MATERIAL TOPICS	IMPACT DESCRIPTION	MITIGATION ACTIONS, INITIATIVES, AND CONTEXT			
IMPROVING PACKAG	IMPROVING PACKAGING RECYCLABILITY AND CIRCULARITY					
		<b>Support sustainable design for recycling</b> AMB's Stage Gate Process evaluates product design in terms of recycling and works with sector associations and stakeholders to improve products recyclability.	By 2030 all packaging must be designed to be recyclable. By 2035 packaging should be recycled at scale and at sufficient quality to replace virgin raw materials. AMB is working to replace the use of multi-material with mono-material. This shift leads to an increase in the recyclability of the materials themselves and an environmental saving of 20% CO2eq.			
	Circularity, eco-design and attention to		AMB is working to replace the use of multi-material with mono-material.  This shift leads to an increase in the recyclability of the materials themselves.  AMB has introduced a process to recycle trays called TrayRevive.			
	product's life cycle	Increase in the circularity of products  AMB develops circular economy programs and initiatives aimed at recovering production waste, using recycled products, and extending product life.	AMB obtained ECOSENSE certification for its two facilities in Italy, San Daniele del Friuli and Amaro (Province of Udine) thanks to the improvement of the PET multilayer trays recyclability.			
			Depending on customer requests, AMB produces recyclable and circular packaging as well as packaging composed of more sustainable materials.			
ENVIRONMENTAL			AMB is voluntarily committed to the CIRCULAR PLASTIC ALLIANCE (CPA) and is a member of PETCORE, PET SHEET EUROPE (EuPC) and CEFLEX sector groups. AMB is also a member of R-Cycle, which works to improve packaging recyclability through digital product passports.			
	Eco-friendly raw materials	Contribution to use of sustainable material  AMB replaces virgin raw materials with recycled and more sustainable ones, consequently avoiding the depletion of available raw materials and decreasing the risk of damage to natural ecosystems.	AMB uses at least 30% post-consumer recycled (PCR) PET and is committed to increase it up to 50% by 2030.			
			AMB is supporting the transition from PVC and PS to sustainable PET.			
			AMB uses Prevented Ocean Plastic raw materials, resulting in environmental, social and reputational benefits.			
		the risk of damage to natarat ecosystems.	AMB carries out LCA studies on its products.			
		Consumption of virgin raw materials  AMB purchases virgin raw materials, but the use of fossil material increases the risk of depleting natural resources	In 2022 the high volatility of the market pushed up the average RPET price to an unusual level and above the price of virgin material. Customers that had no or partial obligations preferred to limit the demand of RPET. AMB guarantees at least 30% recycled content in standard product to tackle this inflation in raw materials.			
		Shortage of available raw materials  PPWR and SUP directives set recycled content targets for bottles and other containers,	AMB relations and contracts with rPET suppliers guarantee future supply.			
		potentially creating a market shortage of rPET for AMB and other film producers.	AMB started using post-consumer trays as an alternative to post consumer bottles.			



ESG AREA	MATERIAL TOPICS	IMPACT DESCRIPTION	MITIGATION ACTIONS, INITIATIVES, AND CONTEXT
DEVELOPING ENVIR	ONMENTAL, SUSTAINA	BLE AND ECONOMIC PROCESSES	
	Careful internal	<b>Waste recovery</b> AMB recycles unavoidable scraps and reuses them in the production process to avoid landfill waste.	AMB is continuously improving its production processes to reduce waste.
	waste management	Correct waste disposal management Through efficient and careful waste management, AMB reduces its environmental impact, thereby also cutting transport and disposal costs.	AMB promotes proper waste disposal practices within its production sites.
ENVIRONMENTAL	Careful internal water management	<b>Use of water resources</b> AMB's industrial activities require water. These withdrawals are regulated to avoid causing water stress in the areas where the organization operates, as well as to avoid water pollution.	AMB uses water in its daily activities not just for production but also to clean machinery.
	Energy and emissions efficiency	Reduction of GHG direct emissions (Scope 1, 2, 3)  AMB started reducing its greenhouse gas emissions with energy efficiency projects.	AMB's UK division in 2022 replaced existing fluorescent lights with LED lighting throughout its factories, including offices, toilets and canteens.
		Carbon footprint  If not properly handled, AMB's management of natural resources could generate negative environmental impacts, increasing the company's exposure to regulatory, environmental, market and reputational risks.	AMB has started to evaluate its carbon footprint under ISO 14064-1 standards to plan an emissions reduction strategy.



ESG AREA	MATERIAL TOPICS	IMPACT DESCRIPTION	MITIGATION ACTIONS, INITIATIVES, AND CONTEXT		
TAKING CAR	E OF AMB'S PEOPLE				
	Employment, diversity and skill development	Employees' well-being  AMB promotes worker training to build a competent and up-to-date workforce. AMB also carries out initiatives to increase the well-being of its employees.	AMB has implemented an a new onboarding process where new employees are supported by a manteining program' for their first 3 months and participate in specialized courses for each function.  With regards to workers' rights, AMB is in continuous contact with trade unions. AMB negotiates workers' productivity and quality BRC (British Retail Consortium) bonuses with the trade unions.  AMB promotes team building activities (e.g., pre-dinner social events to improve employees' sense of well-being.  All group managers and board members meet twice a year to discuss strategic visions for the group.  AMB employees are kept engaged though HR platform, BRC (British Retail Consortium) Global Standards packaging material surveys, and written communications.  Board members meet all of AMB's employees during virtual Employee Town Hall Quarterly Reviews to provide updates of the main activities and objectives.		
SOCIAL		Attraction of talents AMB's above-minimum wage salaries, corporate welfare offerings, and great working conditions to attract professionals.	AMB has a welfare plan, remuneration policies, and initiatives for well-being and work-life balance, such as allowing remote and smart working.  Collaborations with schools, universities and start-ups provide opportunities to attract young talents and enhance new business areas.		
	Occupational health, safety and well-being	Damage to workers' health and safety  AMB may expose workers to physical risks due to the nature of their job activities, particularly in production operations.	AMB is compliant with national and international law, providing the basic requirements to create a safe workplace (for example, Italian D. Lgs. 81/2008, European REACH regulation, European CLP regulation).  All AMB's workers are covered by an occupational Health and Safety Management system and the Organization provides mandatory training and information regarding health and safety matters. ISO 45001:2018 will be implemented in the UK by 2024.		
		<b>Promotion of a health and safety work environment</b> AMB supports its workers in understanding risks, including those not strictly related to work.	AMB has increased health and safety training and drafted graphics for workplace safety.		



ESG AREA	MATERIAL TOPICS	S IMPACT DESCRIPTION	MITIGATION ACTIONS, INITIATIVES, AND CONTEXT			
VALUE CREATION AND SUPPORT FOR LOCAL COMMUNITIES						
	Customer satisfaction	Increase customers retention  AMB has improved its customer care services.	Every year AMB administers a Customer Satisfaction Survey to collect feedback from customers. (The only exception was the 2020-2021 pandemic period when it was replaced with customers interviews.) The process brings AMB closer to its customers, enabling it to better understand their needs and market trends.  AMB measures its logistic and delivery performance to evaluate the delivery performance.  During 2022, AMB worked on a project to to bring OTP (On Time Performance) to at least 95%.			
		Guarantee product quality  AMB ensures the safety of food products,  contributing to increase product quality.	AMB drafts and administers a Quality and Food Safety culture questionnaire.  AMB had no incidents of non- compliance with mandatory quality and safety codes. In 2022, the only non-compliance events regarded voluntary quality codes.  AMB provides a food quality and safety course for all new employees.  AMB quality and safety processes are certified according to the international standards Brand Reputation Compliance Global Standards (BRCGS) and ISO 9001:2015.			
	Product quality and safety	Guarantee consumers' health  AMB provides accurate information to end consumers on how to use its products, to avoid any possibly negative safety and health issues.	AMB is compliant with national and international law, providing the basic requirements to create a safe workplace (for example, Italian D. Lgs. 81/2008, European REACH regulation, European CLP regulation).  All AMB's workers are covered by an occupational Health and Safety Management system and the Organization provides mandatory training and information regarding health and safety matters. ISO 45001:2018 will be implemented in the UK by 2024.			
		<b>Safety use of recycled plastic in food contact application</b> New regulations for recycling plastic entered into force in Oct. 2022.	AMB has two Superclean decontamination equipments that allow recycled plastic to be use in direct contact with food. Plus, AMB is working with a Consortium for the validation of the functional barrier novel technology.			
		Support to local community  AMB interacts with local communities through social, cultural/educational and charity initiatives.	AMB participates in national events to promote the benefit of sustainable packaging.  Every year AMB adheres to a local "Open factory" event, an opportunity to educate local communities about the value of recycled plastics and the importance of proper waste separation.  Local charity support contribution.			



ESG AREA	MATERIAL TOPICS	IMPACT DESCRIPTION	MITIGATION ACTIONS, INITIATIVES, AND CONTEXT		
PROMOTING AND EN	ISURING BUSINESS ETHIC	S, AND INVESTING IN INNOVATION			
		Responsible business conduct (including anti-corruption)  AMB, by integrating ESG issues within its governance, ensures that people at all levels act responsibly, with awareness and respect for human rights principles.	AMB set up an Organisation Management and Control Model. The Model includes an anti-bribery internal system aimed at reducing corruption risk, according to Legislative Decree 231/01. It was approved by the Board of Directors in the last version, on 21/12/2020.		
			AMB drafted an Ethical Code of Conduct and a Modern Slavery (Anti Human Trafficking) Policy.		
	Business ethics and		In 2022 AMB drafted the AMB Supply Chain Code of Conduct that is aligned with the AMB Code of Conduct. These documents ensure that all business partners, suppliers, and manufacturers meet AMB's basic expectations of doing business in regards to legal requirements, ethical practices, human rights, and environmental management.		
GOVERNANCE	regulatory environment	Promoting products transparency and traceability  AMB provides reports, information, and notifications in order to be accountable for its activities and transparent towards its stakeholders.	AMB is working on developing a digital passport, aiming to contribute to the creation of an open and inter-operable standard for attributing digital passports for plastic packaging.		
			AMB publishes information on the web to raise awareness about circular products and underscore its commitments.		
			AMB also drafts Environmental Product Declaration Reports, increasing its accountability and reputation.		
	Innovation	<b>AMB Invests in research and innovation</b> to develop sustainable, profitable, safe and competitive products and processes.	AMB's new research and development laboratory includes a dedicated testing area.		
	and digitalisation (RELEVANT TOPIC)	AMB's processes and systems ensure <b>secure</b> , accurate, and prompt data availability.	AMB is working to improve its cyber- security activities and policies.		

The materiality process conducted by AMB confirmed a general continuity with 2021. The only relevant changes are related to the Company's priorities in terms of key material topics and to the identification of a new material topic: careful water management:

) Such a topic was evaluated relevant both for the actual wordlwide water scarcity context and for the nature of AMB's production processes;

The materiality analysis resulted in inputs to inform decisions about future business strategies to reduce AMB's possible negative economic, environmental and social impacts, while enhancing the positive ones.



### 04.1 OVERVIEW





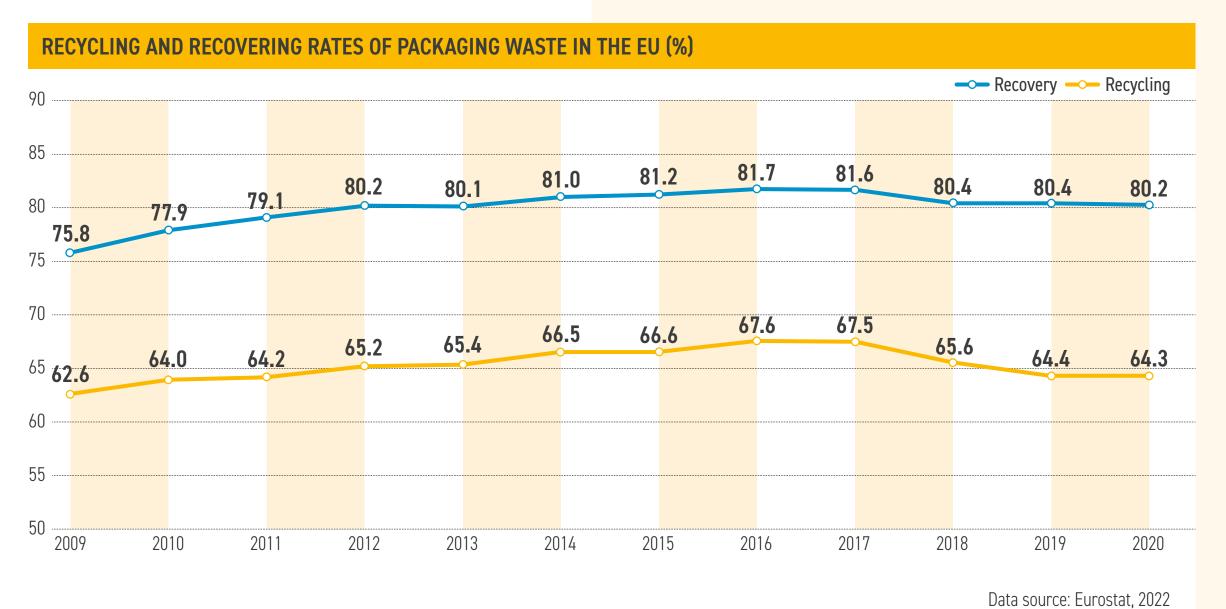




In the EU, between 2009 and 2020, the total mass of packaging waste generated in the EU rose by 20% (up 13 million tonnes). In 2020, packaging waste reached 79 million tonnes (177 kg per inhabitant against 150 kg in 2009), with large differences across Member States. Paper and cardboard represented the most common packaging waste materials (41%), followed by plastic (19.5 %), glass (19%), wood (15%) and metal (5%). Plastic (+27%) and paper and cardboard (+25%) are the two waste streams with highest growth since 2009.

The recycling rate of packaging waste went up slightly from 63% in 2009 to 64% in 2020. However, it has stopped rising since 2016 and has fallen back to 2011 levels since then (Figure 1). The recovery rate (recovery includes recycling, energy recovery and other forms of recovery) rose from 76 % in 2009 to 80% in 2020.

As part of the European Green Deal and the New Circular Economy Action Plan, the EU Commission in November 2022 revised its Packaging and Packaging Waste Directive (PPWD) to ensure that all packaging is reusable or recyclable in an economically feasible way by 2030. Measures are also envisaged to increase recycling rates, improve enforceability, tackle over-packaging and reduce packaging waste.





(1) 2019 data instead of 2020. (2) Estimated. (3) Provisional. (4) Definition differs.



Data source: Eurostat, 2022

04 IMPROVE PACKAGING RECYCLABILITY AND CIRCULARITY

The PPWD requires Member States to take measures to prevent the generation of packaging waste and to minimise the environmental impact of packaging. They also have to take measures to increase the share of reusable packaging placed on the market and of systems to reuse packaging, without compromising food hygiene or consumer safety. The PPWD also sets recovery and recycling targets for packaging waste (and from 2008, for different materials of packaging). The 2018 revision of the directive introduced higher targets for overall recycling for packaging (65% in 2025 and 70% in 2030), and higher material-specific targets (such as 55% for plastic by 2030).

THE RECYCLING TARGETS SET IN THE PACKAGING AND PACKAGING WASTE DIRECTIVE				
	31 December 2008	31 December 2025	31 December 2030	
All packaging waste	Between 55 % and 80 %	65%	70%	
Glass	60%	70%	75%	
Paper and cardboard	60%	75%	85%	
Metals	50%	70% (ferrous metals)	80% (ferrous metals)	
Melals	JU70	50% (aluminium)		
Wood	15%	25%	30%	
Plastic	22.5% (counting exclusively material recycled back into plastics)	50%	55%	

The new Packaging and Packaging Waster Regulation (PPWR) proposal would require that **all packaging be**: **designed for recycling by 1 January 2030** and **recyclable at scale by 1 January 2035**, with the resulting secondary raw materials being of sufficient quality to substitute virgin raw materials.

**Eco-Design** is an approach to design which integrates environmental sustainability with traditional aesthetic and functional design considerations, according to the definition of Enea<sup>1</sup> (Italian National Agency for New Technologies, Energy and Sustainable Economic Development).

Based on the Life Cycle Assessment, eco-design considers all of the ways that a product interacts with the environment at every stage of its life cycle in order to incorporate design choices that provide economic, environmental, and social benefits along the entire value chain.

80% of a product's impact over its life cycle is decided at the design stage, which is why ecodesign is considered to be crucial for reducing the environmental impact and enabling the recycling of materials at the end of life.<sup>1</sup>

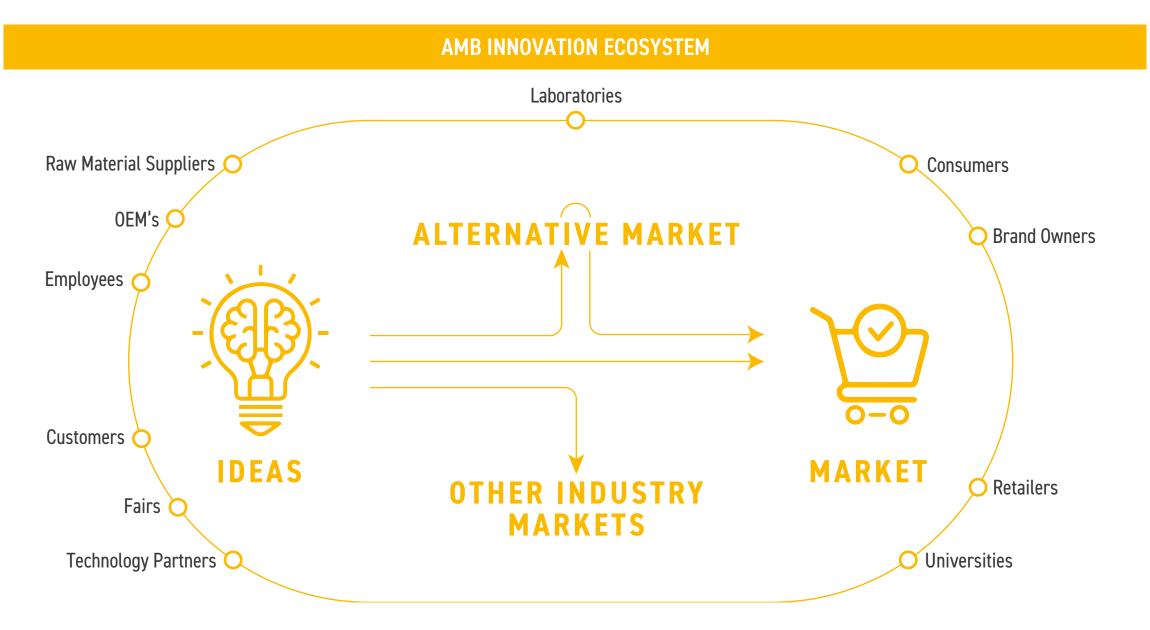


<sup>1.</sup> https://www.enea.it/it/ateco/schede/eco-progettazione

# 104.2 SUPPORT SUSTAINABLE DESIGN FOR RECYCLING

We are committed to improve packaging recyclability with the aim of having all AMB products designed for recycling or to have an alternative recyclable solution by 2030. AMB's Innovation Department assesses new product idea primarily based on whether their recycling rate is in accordance with EU targets. It

then collaborates with sector associations and other stakeholders to further enhance product recyclability, and to generate new sustainable ideas that enrich the company's innovation ecosystem.





The company has invested more than 1M€ in its R&D laboratory over the last three years, equipping it with new advanced equipment to study material behavior and environment impacts, and adding two staff technicians in 2022. This investment has helped nurture new ideas and improve testing of new materials.

During the past reporting year, AMB began a total of 14 new projects, of which 13 related to the sustainability of new packaging materials, demonstrating the company's strong commitment to sustainability and innovation in the packaging business.

#### PERCENTAGE OF PROJECTS RELATED TO SUSTAINABILITY

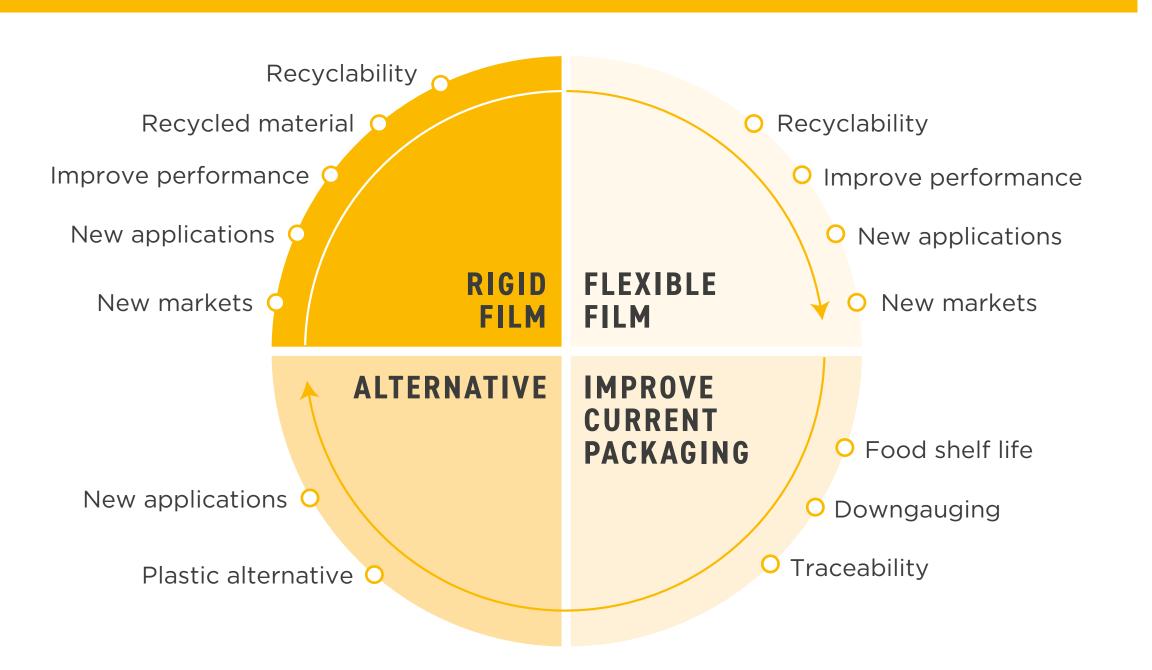




NON GRI 1* Innovation projects related to sustainability	2020	2021	2022
New projects related to sustainability started in the reported year	12	8	13
Total projects started in the reported year	17	10	14
% of new projects related to sustainability started in the reported year	71%	80%	93%

<sup>\*</sup>The NON GRI 1 indicator is not applicable to the UK Tooling plant due to the different nature of the output:

#### AMB INNOVATION FRAMEWORK



AMB's main area of innovation is the development of PET and flexible PE films, as well as creating new applications and markets for these films. AMB is continuing to work on improving the recyclability of PET, including post-industrial and post-consumer materials, but above all to improve the performance of mono PET compared to multilayer solutions.

One of the main functions of packaging is to protect packed food against external agents that can reduce its shelf life.

The challenge we face is that the key components responsible for barrier performance in food packaging are those that can affect its recyclability.

In response, AMB has developed a PET mono material film that guarantees the similar performance as existing multilayer PET/PE/EVOH/PE packaging for pasta and bakery applications.

This innovative film has been improved over the years to extend its use for other applications, such as seasoned and cooked food products.

AMB PET mono-material high barrier is recyclable according to DIN EN 13430 and is the only PET high barrier sustainable solution that in 2022 obtained the recyclability endorsement of PETCORE protocol (recyclability evaluation protocol for PET trays).



PET mono-material high barrier - Recyclability assessment by Cyclos-HTP Institute

The Institute cyclos-HTP is a company specialised in the classification, assessment, and certification of recyclability of packaging and goods as well as in research and development in this area





In the new PPWR proposal, the recyclability grades take into consideration the whole packaging and its components (e.g. LID+bottom in a tray) to be compatible with state-of-the-art collection, sorting and recycling processes, and without hindering the recyclability of the packaging unit's main body.

AMB has designed a **full PET tray packaging** solution that is already recyclable with existing recycling infrastructures.

AMB Sustainable. PET tray solution	DESIGN FOR RECYCLING AND SUSTAINABILITY FEATURES
BOTTOM mono PET HB	Transparent <b>mono material PET</b> No EVOH  Recycled content —rPET  Food shelf life guarantee
PRINTING FLOATING LIDDING FILM design for disassembling	<ul> <li>LID with density &lt;1 g/cm³</li> <li>Peelable lid film allows to easily separate any non-recyclable materials in the lid from a 100% recyclable bottom, thanks to different density of the materials</li> <li>Peelable mono PE LID recyclable</li> </ul>
UNPRINTED MONO PET LIDDING FILM	Mono material PET No EVOH The BOPET film is produced with 60% of PCR PET from chemical recycled



In 2022 AMB mono PET HB solution was among the winners of the **CONAI (Consorzio Nazionale Imballaggi) Ecodesign award 2022**.

AMB PET mono HB received the best rating in:

- Facilitation of recycling activities
- Recycled material usage
- Saving raw materials
- Optimization of production processes



CONAI ECODESIGN AWARD 2022 and AMB PET mono HB

CONAI ECODESIGN 2022 AWARD						
Company	Product	Score	Facilitating recycling	Recycled material usage	Saving of raw materials	Optimisation of production processes
AMB S.P.A.	AMBAR 38HB – Mono PET with high barrier	15	4	4	3	4

Sws

A mono PET high barrier, as opposed to a multilayer barrier solution, improves not only recyclability but also presents an environmental saving (-20% CO2 emissions), as verified by AMB EPD (Environmental Product Declaration) studies.







Mono PE flowpack



Mono PE MAP tray

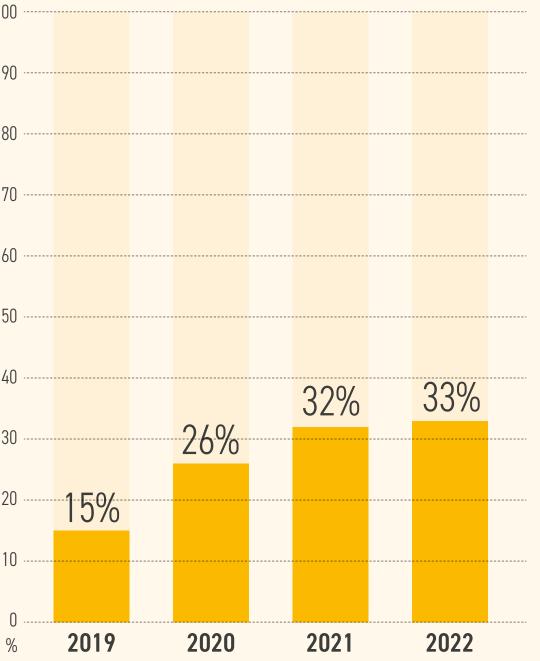
AMB, with its strong foundation in PE production, is developing several fully recyclable mono PE solutions, such as a thermoformable mono PE film for a full mono PE tray solution, lid mono PE and mono PE for flowpack application.

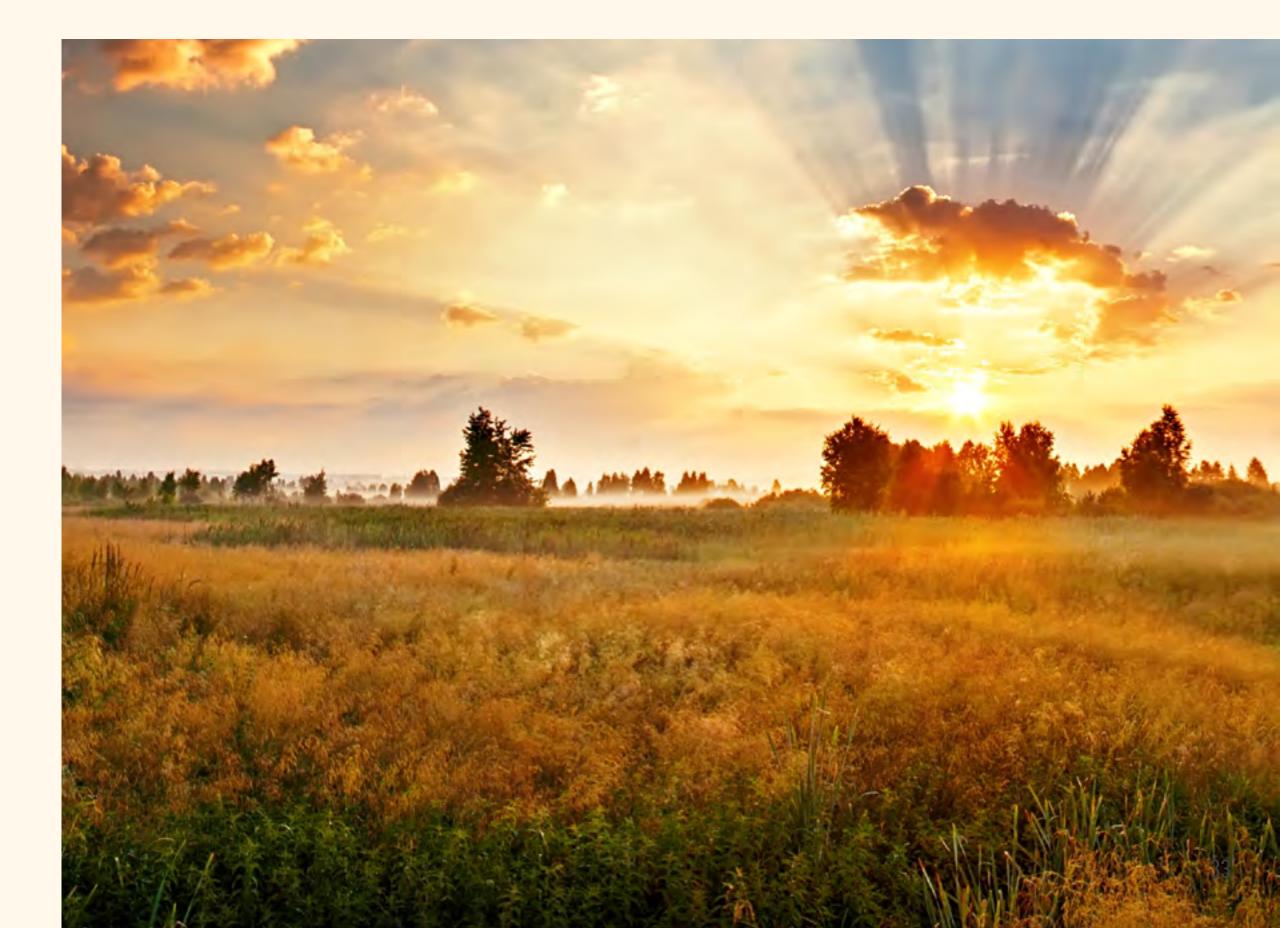
The increase in 2022 vs 2021 was limited to just one percentage point because of the rally in raw material prices that year.

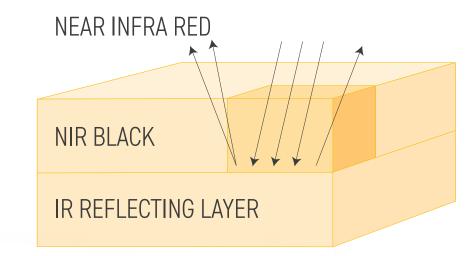
For 2023, we forecast further growth, driven by three factors:

- The Italian EPR system's acceptance of recyclable multilayer PET trays
- The substitution of PA/PE structures with mono PE both for vacuum bot for soft thermoforming
- The completion of several conversion projects from multimaterial structure to mono PE or mixed PO structures





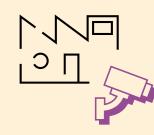








#### **Technical Notice - Detectability**



#### Sorting centre

Detectability: ability of packaging to be recognised by optical sorting systems

Sortability: ability of packaging to be channelled to the correct stream

#### **BLACK MONO PET - NIR DETECTABLE**

A key part of PET recycling guidance is that, whenever possible, clear plastic should be used as it has greater recycling potential. When colored plastic packaging is required, the guidelines encourage the use of detectable colorants.

In 2022, AMB launched a **PET black film with** detectable black pigments.

Black is widely used because it is an attractive color for packaging applications. The most common pigment for black coloring is carbon black which provides excellent color strength and quality. Unfortunately, it is also difficult to detect and sort during the recycling process because it blocks the polymer spectra.

The use of near infrared spectrography (NIR) and high-speed identification algorithms is a highly efficient, accurate and consistent method for identifying and sorting mixed plastic waste by polymer types. The main problem with this process is that if the plastic is colored with a dye that absorbs instead of reflecting the NIR, the grader is unable to identify the "signature" from the spectrophotometer.

As a result, black packaging cannot be sorted by constituent polymer and will end up in the mixed polymer stream or with non-recycled residual waste.

AMB has developed a black film without carbon black that is detectable by current sorting technology. The polymer grade of the new black packaging will then be successfully identified, and the packaging will be directed to the correct polymer stream to be properly recycled.



- Facilitates recycling because it contains no Carbon Black
- New black dye detectable by NIR instrumentation makes black packaging recyclable (COTREP's protocol passed)
- Can be easily sorted and recycled where the right infrastructure is in place

Static and dynamic tests performed on the premises of two O.S. manufacturers (PELLENC SA and TOMRA) according to the COTREP procedure returned positive results.

#### PREVENTED OCEAN PLASTIC™

In 2022, AMB in the UK partnered with Bantam Materials UK Ltd. to source and include 30%

Prevented Ocean Plastic™ in certain products.

Through this initiative, discarded plastic bottles are picked up by collectors in areas with ocean plastic pollution, and are sent to local collection centres for payment. Upon arrival, the bottles are sorted, then compressed for transport to recycling facilities, where the plastic is washed and processed into raw material flakes according to European quality standards.

All Prevented Ocean Plastic™ is responsibly sourced and is traceable along its full transformation journey from collection centre to sustainable recycled packaging on the supermarket shelf.



#### PREVENTED OCEAN PLASTIC™ CASE STUDY

In 2020, Lidl became the first UK supermarket to use Prevented Ocean Plastic<sup>™</sup> packaging, initially for fish products and starting in 2022 for fresh meat as well. From October 2022, Lidl's 400g and XXL 667g Deluxe sausages were packaged in thermoformed trays containing a minimum of 30% Prevented Ocean Plastic<sup>™</sup>.

These trays are manufactured by IPAC Packaging Innovations based in Gateshead, Tyne & Wear, using rPET film, with **30% Prevented Ocean Plastic™**, manufactured by AMB Packaging UK.







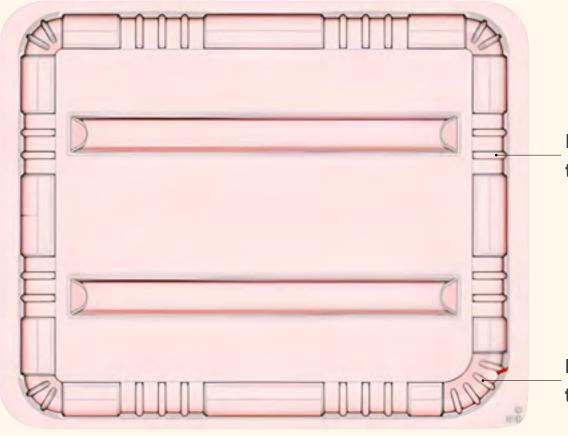


#### PACKAGING MINIMIZATION

The new PPWR draft regulation would also introduce requirements for packaging minimization, meaning that packaging must be designed to minimize weight and volume.

Thanks to an intelligent downgauging process, the quantity of plastic needed for the final packaging is reduced along with the related carbon emissions, without compromising the safety guidelines requested by the customer. The same barrier and structural properties are guaranteed.

AMB tooling design center can assess the minimum necessary volume or weight of packaging, demonstrating its findings with technical documentation.

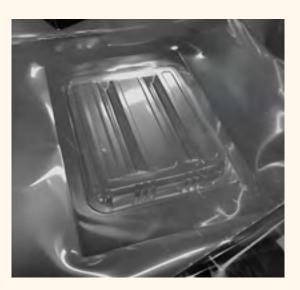










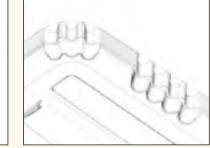


#### **NEW DESIGN**

- **3 levels of strengthening** are designed for testing.
- Geometry must work with the variable depths of the tool.
- The suggested alternatives must not impede on the trays function. Filling and sealing are not effected.

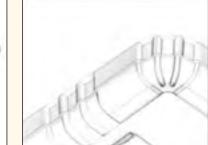
Level 1
Heavy
Ribbing





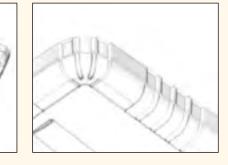
Level 2
Medium
Ribbing





Level 3
Light
Ribbing

el 3 Light bing



Ribbing added to the sidewalks

Ribbing added to the corners



Testing of the existing pack to establish areas of improvement and develop new pack geometry to enable a reduction in the film gauge \*AMB in-house tooling process



# 04.3 ATTENTION TO PRODUCT LIFE CYCLE

Reliability and clarity of information are crucial when dealing with sustainability and AMB is a pioneer in environmental communication. In 2022 it was the first company to publish Environmental Product Declarations (EPDs) referring to PET sheets products.

The EPD is based on the Life Cycle Assessment (LCA regulated by ISO 14040 and ISO 14044), which quantifies the environmental performance of products at various stages of their lifetime. Thanks to this certification, it is possible to calculate the environmental impact of products, identify focus areas for reducing their impact, define strategies, and monitor progress and improvements.

#### LIFE CYCLE ASSESSMENT

An ISO standard methodology that assess the **environmental impacts** of a product or a process throughout its life cycle, starting **from raw material** production to use and **end of life phases**.

The LCA approach provides a production system overview and the environmental effects along its **entire supply chain**. It equally considers different forms of impact: **polluting emissions**, **use of resources**, **energy consumption and waste production**.



#### **ENVIRONMENTAL PRODUCT DECLARATION**

A third party certification communication tool that enables **comparison of LCA analyses & results**. The preparation of EPD always passes through a series of rules by reference standards, more specifically the EPD general program instructions and the **Product Category Rules (PCR)**.

### WHAT IS THE FUNDAMENTAL EPD INFORMATION?

- Description of the company and the products with reference to performances
- The system boundaries considered for the analysis of the environmental impact
- A clear list of the environmental indicators used to express the impact, highlighting each cycle phases contribution to the overall impact







EPD analysis allows us to quantify the environmental benefits and performance of our products, thus allowing end-users and other stakeholders to make more informed choices. This analysis offers our clients and partners fundamental inputs for their communication and marketing strategies.

AMB EPDs were published in 2022 on the International EPD system website:

https://www.environdec.com/library/epd5784

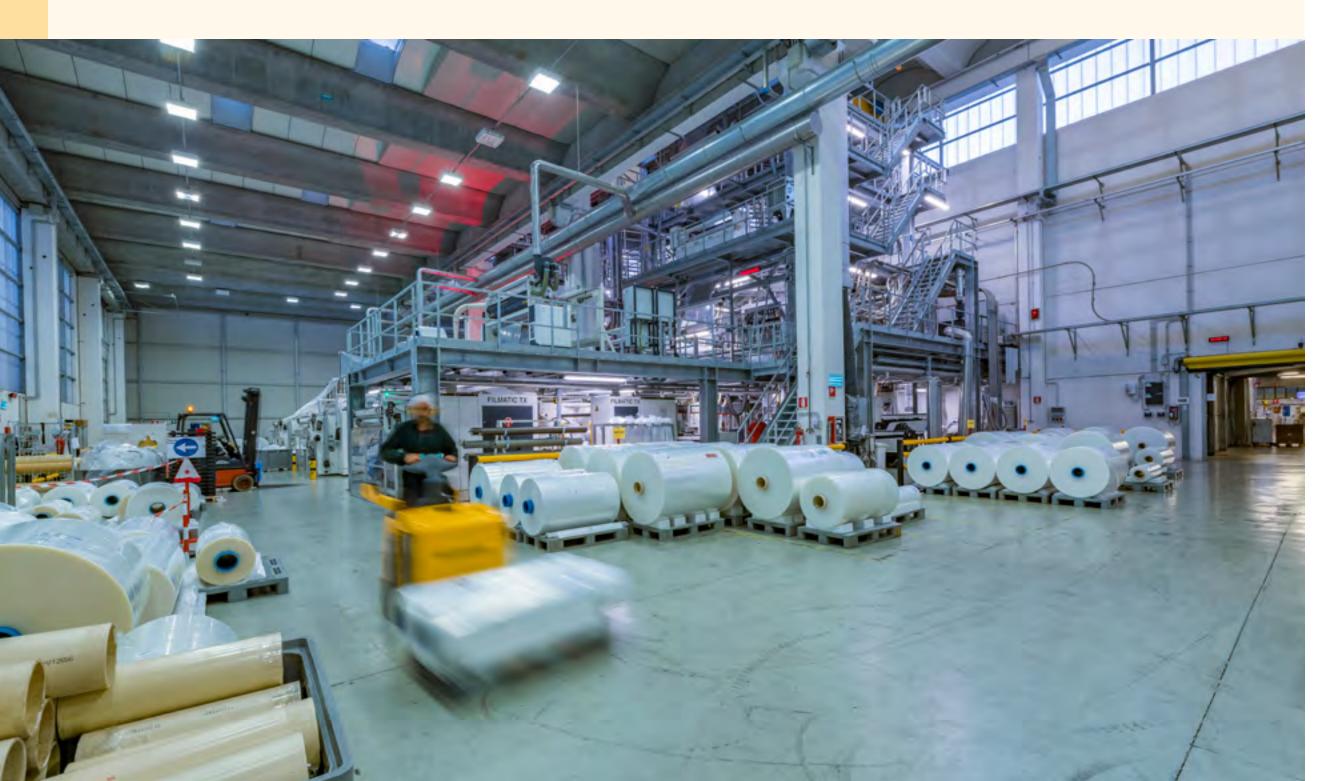
https://www.environdec.com/library/epd5785



# 04.4 INCREASE PACKAGING CIRCULARITY

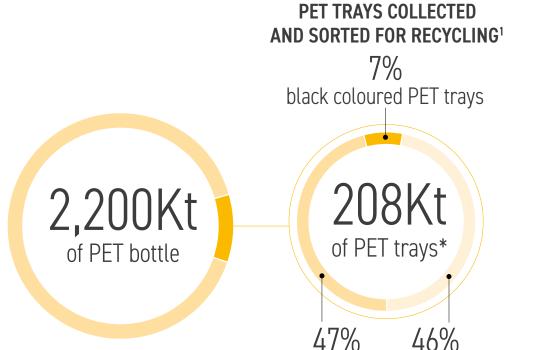
The European Green Deal aims to boost the efficient use of resources by moving to a cleaner circular economy. Circularity is drilled into AMB's mind-set, with a history of acting proactively to develop and perfect recyclable packaging.

The most important key action related to circularity is to promote closed looped initiatives for recyclable PET trays and the eco-design of our products.



### TRAY CLOSE LOOP

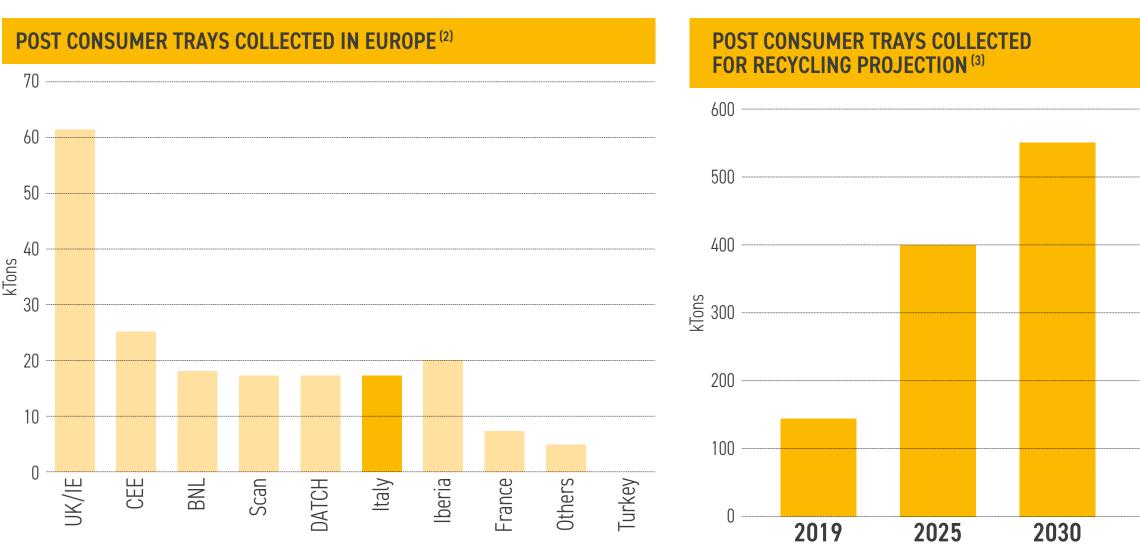
Out of 1MTons PET sheet consumed in Europe just 21% is collected, 52% estimated PRC content, mainly coming from bottles



Clear monolayer

PET trays

\*This does not include values for the tonnage of trays present within PET bottle or other mixed plastic bales



Clear multilayer

PET trays

Sources: (1)PET MARKET IN EUROPE STATE OF PLAY 2022. Eunomia (2)EPR schemes reporting CITEO, COREPLA, RECOUP, FOSTPLUS and others (3)PET Market in Europe. State of play. Eunomia

AMB's tray-to-tray recycling initiative, **AMB Tray Revive**, develops PET trays recyclability, creating a demand for this valuable secondary raw material.

This successful project, which AMB developed as part of our overall sustainability strategy, utilises post-consumer trays to create films which are then used to produce form fill seal packs and new thermoformed trays. Cooperation with all our stakeholders is a critical point to reach our goal of packaging recycling.

It was launched in 2022 with the collaboration of an AMB supplier.

The post consumed trays are broken down into flakes which are then used to manufacture TrayRevive products.

AMB's customers can in turn guarantee their customers recyclability and sustainability – an important factor when appealing to today's ecoconscious consumers.



Bookmark

# AMB and B. For Pet partner for tray-to-tray recycling

### Italy

▲ EUWID+ 30 August 2022 | ● ~ 1 min





AMB and B. For Pet aim to close the loop for food packaging trays made of

The Italian film producer AMB SpA, based in San

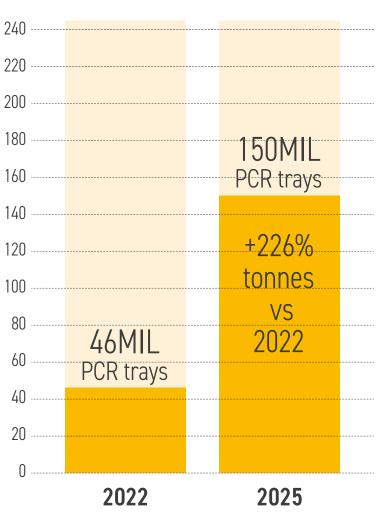
Daniele del Friuli, and the recycling company B. For Pet
signed a partnership agreement in mid-August. The
cooperation will focus on closing the loop for food
packaging trays made of PET.

Under the agreement B. For Pet will supply PET flakes derived from post-consumer trays to AMB. The company will use them to produce food-grade transparent film. "The partnership will ensure significantly higher tray recycled plastic content in AMB end products by utilising materials that up till now could not be used," the plastics converter reported...



#### **AMB TRAYREVIVE TARGETS**

We are committed to increasing our use of raw materials derived from post-consumer trays by 226% between 2022 and 2025.



# 04.5 ECO-FRIENDLY RAW MATERIALS

In line with the Green Deal, the new Circular Economy Action Plan (CEAP) commits to making all packaging reusable or recyclable by 2030, and to consider other measures to reduce overpackaging and packaging waste by encouraging re-use and recyclability of packaging, reduce the complexity of packaging materials and introduce minimum recycled content in plastic packaging.

Along with the European Strategy for Plastics, CEAP commits to a greater uptake of recycled plastics and a more sustainable use of plastics.

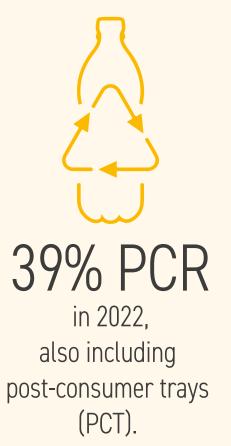
To ensure circularity, packaging needs to be designed and manufactured in such a way to allow for more substituting of virgin materials with recycled materials. Increased use of recycled materials will develop the well-functioning recycled-material markets required for a circular economy, as well as cut costs and reduce negative environmental impacts. Among packaging materials, plastic packaging has the lowest share of recycled materials. Increasing the uptake of recycled plastics requires mandatory targets for recycled content in plastic packaging, depending on the contact-sensitivity of different plastic packaging applications. To accelerate packaging circularity, the targets should become binding by 2030, with increased targets by 2040.

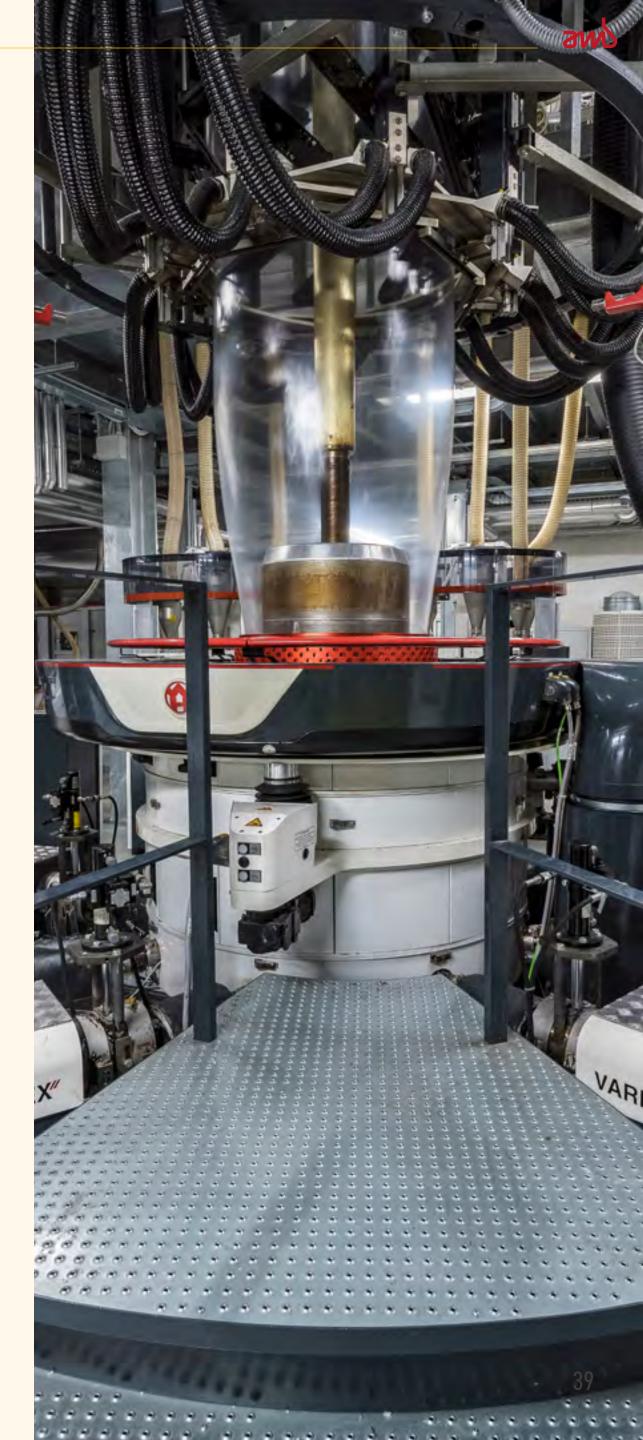
MINIMUM RECYCLED CONTENT FOR CONTACT SENSITIVE PET PACKAGING					
Deadline	PCR content target set in PPWR proposal	AMB PCR content target			
2030	30%	50%			
2040	50%				

AMB replaces virgin raw materials with recycled and more sustainable ones, consequently avoiding the depletion of available raw materials and decreasing the risk of harming natural ecosystems.

AMB is committed to carefully selecting and boosting the use of recycled input materials where possible, respecting the target to guarantee at least 30% recycled content until 2025, reaching 39% PCR in 2022, also including post-consumer trays (PCT).

AMB uses Prevented Ocean Plastic recycled raw materials, resulting in environmental, social and reputational benefits.







	NON GRI 3 Recycled input materials used (raw materials only)		GRI 301-2 Recycled input materials used				
	2020*	2021*	2022	2020*	2021*	2022	
Recycled input materials used (%)	51%	53%	44%	50%	50%	42%	

<sup>\*</sup> It is worth noting that the 2020-2021 data has been updated, compared to the 2021 AMB Sustainability Report, with the tooling division no longer being included.

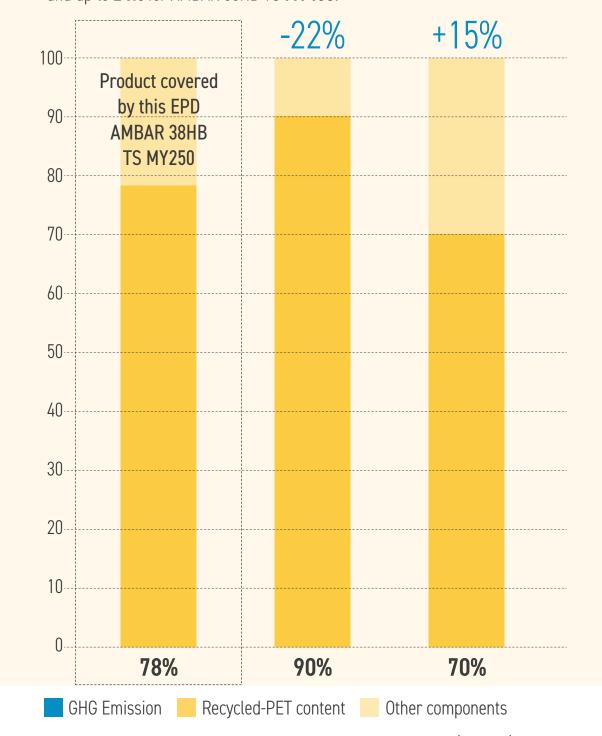
AMB takes into consideration all input materials, as recommended by the GRI Standard 301-2, not just raw materials. At AMB, recycled materials account for nearly 42% of all materials consumed. Post-Consumer Recycled materials (PCR) from waste recovery centres, and the Post-Industrial secondary raw materials (PIR) are considered to be recycled input materials, in compliance with the standard ISO 14021:2016. The internally recovered scraps are not counted as recycled content in accordance with the same standard. However, this type of input does not differ in terms of properties from PCR, and represents an opportunity to enhance the circularity of production through partnerships with different players in the value chain.

## Using more recycled plastics can reduce dependence on fossil fuels for plastic production, curbing CO2 emissions.

The positive environmental impact created using recycled materials is described in AMB EPD.



By increasing the rate of recycled PET we have estimated that we can reduce the GWP fossil up to 22% for AMBAR 38HB TS MY250 and up to 24% for AMBAR 38HB TS MY450.



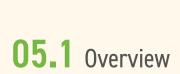
On the other hand, the nature of AMB's products does not allow for extensive use of renewable sources, which are limited to wood and paper used for packaging of the products. Most materials used by AMB are non-renewable, including plastic, inks and coating solvents for the plastic extrusion processes. The ratio between non-renewable and renewable material has been stable over the years.

GRI 301-1: Materials used by weight (t)	2020*	2021*	2022
Non-renewable materials used	101,148	112,417	104,873
Renewable materials used	3,041	3,869	2,980
Total material used	104,189	116,286	107,854

<sup>\*</sup> It is worth noting that 2020-2021 data has been updated, compared to the 2021 AMB Sustainability Report, following the removal of the tooling division from the data perimeter.



Source: environdec.com/library/epd5784



**05.2** Careful internal waste management

**05.3** Careful internal water management

**05.4** Energy and Emission Efficiency



# 05.1 OVERVIEW









AMB's goals are not simply limited to provide products and services that create a cause-effect relationship between environmental sustainability projects and their benefits for the business.

Social, environmental and economic considerations are all equally essential components of a successful, sustainable business model. The main elements of sustainable development are environmental protection, social inclusion and economic growth. These three elements must be strong and well balanced to ensure that development can be sustained.

In 2022, several sustainable projects were included in AMB's action tracker project management, integrating sustainability in AMB's daily business performance and processes.

The following two projects were carried out in the action tracker in 2022.

Sustainable and economic project	Sustainable advantage	% savinç (year 2022
Pallet transportation collection and reuse	Avoid purchasing new pallets and contribute to the circularity in the production	9% pallet reused
Blown scraps reduction	Avoid use of virgin raw materials, contribute to the circularity and efficiency of our internal processes.	5% ton reduction

Initiatives that promote internal packaging reutilization, waste reduction, scrap generation, careful water management and energy efficiency will lead to lower environmental impacts and cost savings in the medium to long term.



### CAREFUL INTERNAL 05.2 WASTE MANAGEMENT

Careful waste management involves both raising employee awareness and optimising waste collection and separation in the production process. While AMB is in charge of managing its internally produced waste, AMB must also work closely with its waste collection providers. And we actively partner with our clients to create value from what they consider disposable waste, but which for us constitutes reusable inputs.

In line with EU's commitment to the UN 2030 Agenda for Sustainable Development, including its SDG 12.5, **AMB** is committed to increase the percentage of waste diverted to recycling instead of landfills, and improving its separated waste collection.



**SDG 12.5: SUBSTANTIALLY** 

**REDUCE WASTE GENERATION** 

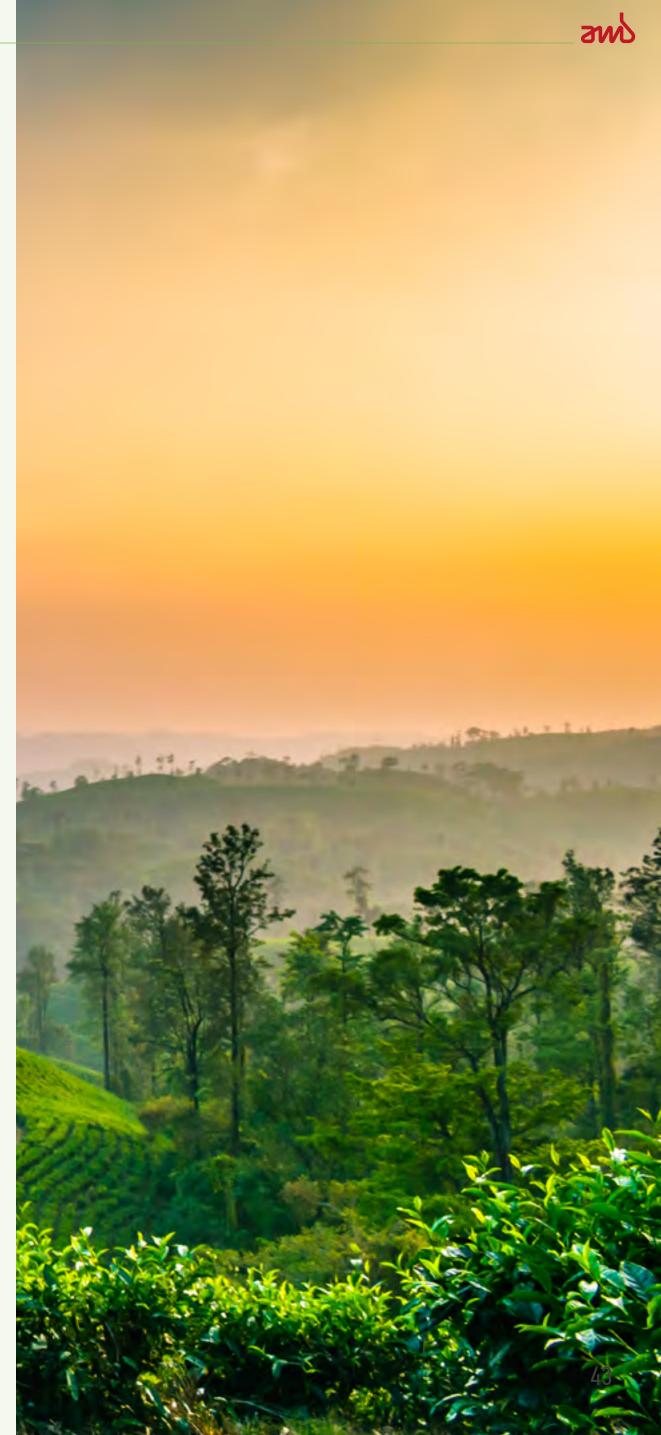
By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse. More efficient scheduling and production reduces many of the impacts stemming from the use of input materials. Unavoidable scraps are reworked (or sold as by-products) to prevent them being sent to landfill, avoiding waste dispersion into the environment and reducing our raw materials consumption.

In 2022, 3,847 tonnes of by-products were reused, contributing to the circular economy and our zero waste goals. This is roughly a 20% increase from the previous year was due to improved selection of our internal scraps.

All our by-products are certified by a third-party body.







### **05** DEVELOPING ENVIRONMENTAL SUSTAINABLE AND ECONOMIC PROCESSES

We also collect secondary packaging of goods, such as pallet wrap, pallets, and cores to re-use them in the production process or to sell them to other customers.

The Health Safety and Environmental (HSE) department is entrusted with managing waste, with experts who monitor compliance with National and European laws. Nevertheless, everyone in the company is involved in the separation of waste to maximise recycling and properly manage waste. After collection, the waste flow is handled by specialised companies that deal with recovery processes and, where this is not possible, with disposal in accordance with the relevant laws. External operators are monitored through periodic control of licences and waste relevant documents.

AMB's waste mainly results from its production processes: the department with the highest waste production, including hazardous waste, is the converting department.

The main categories of waste are process liquids and wastewaters (machine washing liquids, inks and glues), plastic, other process waste (rags, filters) and packaging materials (cardboard, wood, tanks).

Upstream waste separation limits the environmental impact of waste.



In each production unit, different types of waste are collected in separate containers located in designated areas. In 2022, the UK division started to separate and recycle different types of waste, reducing the quantity of general waste.

Waste produced by AMB activities is delivered to authorized sites according to its classification, while recovery destinations are favoured and maximized.

In 2022, around 83% of the total waste produced was diverted from disposal.

In Italy, waste transport, recovery and disposal activities are carried out by third parties, who are authorized and registered with the National Register of Environmental Operators.

Extensive training by the HSE staff helps employees correctly separate waste.

Particular attention is paid to the extrusion process that generates backflush purge (scraps from filter cleaning), which has been started to be recycled during from 2022.

A table in the Annex details the amounts of waste produced, split into hazardous and non-hazardous waste for the three-year period 2020-2022.

In the reported period there was a decrease in both non-dangerous and dangerous waste generation and of the total waste generated. This was due mainly to lower production volumes because of improved stock management and to lines being totally shut during summer and winter holidays, unlike in previous years when they remained open.

GRI 306-4: Waste diverted from disposal (t)	2020*	2021*	2022
Total amount of dangerous waste diverted from disposal	68	37	44
Total amount of non -dangerous waste diverted from disposal	1,843	1,819	2,735
Total amount of waste diverted from disposal	1,911	1,856	2,779
Total amount of generated waste	3,994	3,946	3,352
% Total waste diverted from disposal	48%	47%	83%

<sup>(\*)</sup>It is worth noting that 2020-2021 data has been updated, compared to the 2021 AMB Sustainability Report, following the removal of the tooling division from the data perimeter.

# 05.3 CAREFUL INTERNAL WATER MANAGEMENT

In 2022, careful internal water management was introduced as a new material topic, both in the context of global water scarcity and for AMB's production processes.

Water covers 70% of our planet. However, only 3% of the world's water is fresh water and two-thirds of that is tucked away in frozen glaciers or otherwise unavailable for our use.

Climate change, pollution, agriculture, and growing populations are some of the issues that are having a negative impact on our water systems. This global crisis is also affecting rivers, lakes and aquifers that are drying up from extreme weather.

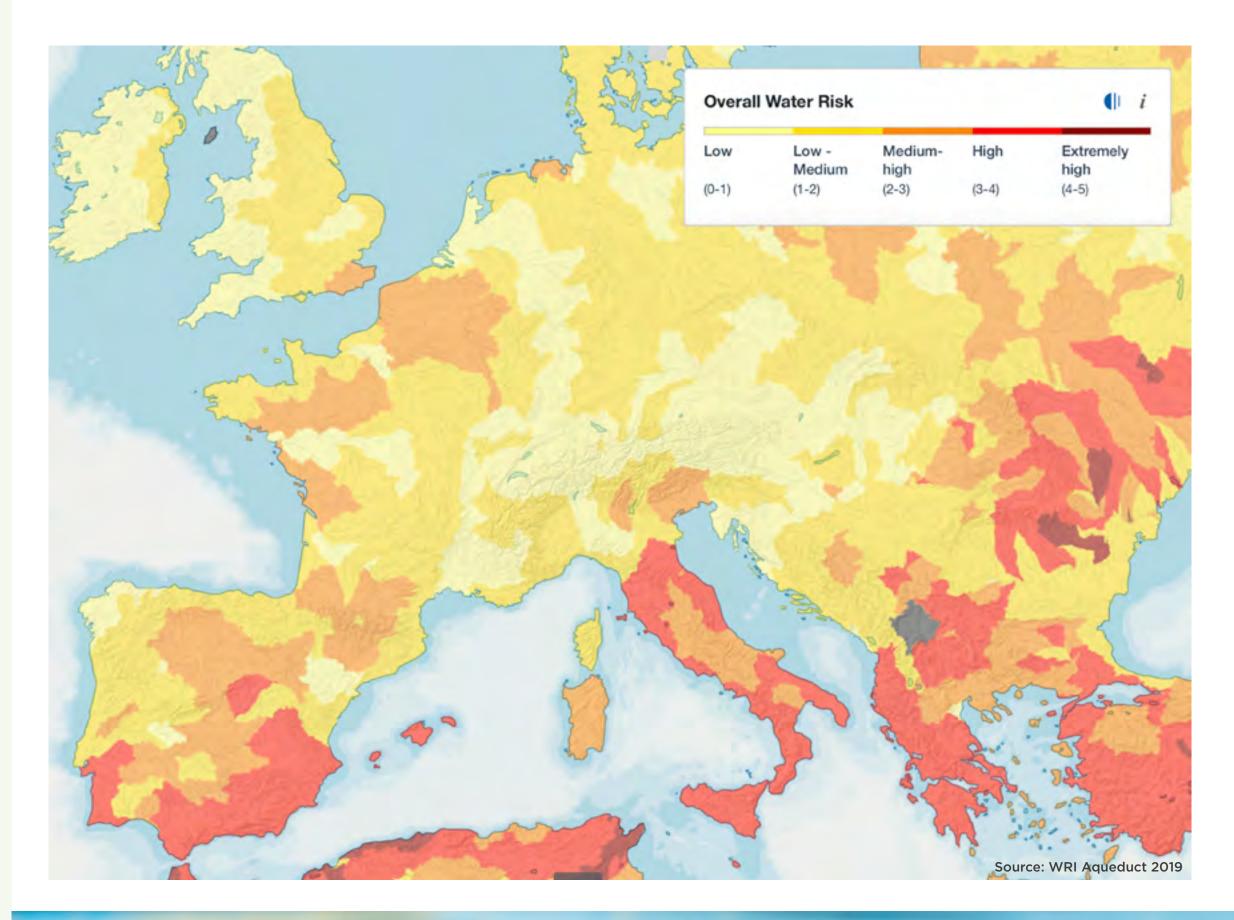
AMB's operations require withdrawing water resources. Such withdrawals are managed according to regulations to avoid causing local water stress, as well as in order to avoid water pollution.

AMB's water consumption is mainly for general service (municipal water supply for domestic and sanitation purposes), and for industrial use (degassing processes, converting department and fire-fighting).

GRI 303 : WATER AND EFFLUENTS TOTAL WATER WITHDRAWAL FROM ALL AREAS (ML)	2022 Fresh water
Surfacewater	0
Groundwater	0
Seawater	0
Produced water	0
Third-party water	31
Total withdrawn	31

AMB's water stress level is assessed using the Aqueduct tool, an index that aggregates and weighs indicators that consider water availability in terms of quantity, quality, legislation and outlook.

Considering this overall indicator, the Italian division falls within a medium-high/high water stress category and UK division in a low-medium water stress category.







# 05.4 ENERGY AND EMISSION EFFICIENCY

Developing an effective corporate climate change strategy requires a detailed understanding of the company's greenhouse gas emissions. In 2021, AMB started monitoring GHG emissions that are produced directly by owned or controlled assets (Scope 1), and indirectly by purchased and consumed energy (Scope 2).

AMB accounts for GHG emissions along its entire value chains and product portfolios (Scope 3) to comprehensively manage GHG-related risks and opportunities. In 2022, AMB followed UNI EN ISO 14064-1:2019 to measure the carbon footprint of its Italian, UK and German divisions.

Most of our energy consumption is due to the extrusion processes. Energy requirements are reviewed periodically to implement improvements where necessary. Where possible, machines are fitted with variable speed drives so they can adapt their energy consumption to the production plan.

Overall energy consumption decreased in 2022 mainly due to reduced production volumes because of stock optimization and company closing days for holidays.

The decrease in car fleet consumptions ensued from a smaller car fleet.

To date, there are no specific supplier agreements for purchasing certified renewable energy; however, the general energy mix data provided by AMB's UK suppliers show that they are currently relying on more than 50% of renewable energy sources.

GRI 302-1: Energy consumption within the organisation (GJ)	2020*	2021*	2022
Gasoline consumption	133	90	55
Diesel consumption	2,477	2,374	1,107
Car fleet consumption	2,609	2,463	1,163
Consumption of natural gas for heating and production	5,786	6,119	4,401
Consumption of electricity purchased from renewable sources	0	0	0
Consumption of electricity purchased from NON-renewable sources	216,924	234,124	213,639
Electricity consumption	216,924	234,124	213,639
Electricity from renewable sources (%)	0%	0%	0%
Total energy consumed	225,319	242,706	219,202

(\*)It is worth noting that 2020-2021 data has been updated, compared to the 2021 AMB Sustainability Report, following the removal of the tooling division from the data perimeter.

### **ENERGY EFFICIENCY**

Using energy more efficiently helps to protect the environment, mitigate climate change, and improve quality of life. Moreover, energy is among our four most significant cost items: reducing our energy consumption will also positively impact our economic performance. In compliance with the Legislative Decree 102/2014 (Implementation of the 2012/27/EU directive on Energy Efficiency), the AMB Italian division must draw up an Energy Diagnosis every four years and report, from year to year, any savings achieved from energy efficiency actions.

This energy reporting must consider the savings achieved at all AMB's Italian consumption sites and must be presented to ENEA by 31 March of each year. (ENEA is a National Agency that operates in the energy, environment and new technologies sectors in support of competitiveness and sustainable development policies. It is supervised by the Ministry for the Ecological Transition - enea.it/it).

It is possible to register a slight increase of share consumption, corresponding to an **overall increase of 161 TOE** (tonne of oil equivalent) for the italian site. The energy impact of the **San Daniele production site is slightly increased**, going from 113.0 TOE / 1,000 t to 116.4 TOE / 1,000 t, **approximately 3.0%**. This increase corresponds to a higher consumption of 189 TOE.

The energy incidence of the **Amaro production site has decreased**, passing from 105.5 TOE / 1,000 t to 104.2 TOE / 1,000 t. **This reduction, of about 1.2%**, corresponds to a saving of 28 TOE.

Data source: ENEA savings reporting 27.03.2023 (according to article 7, paragraph 8 of Legislative Decree 102/2014)

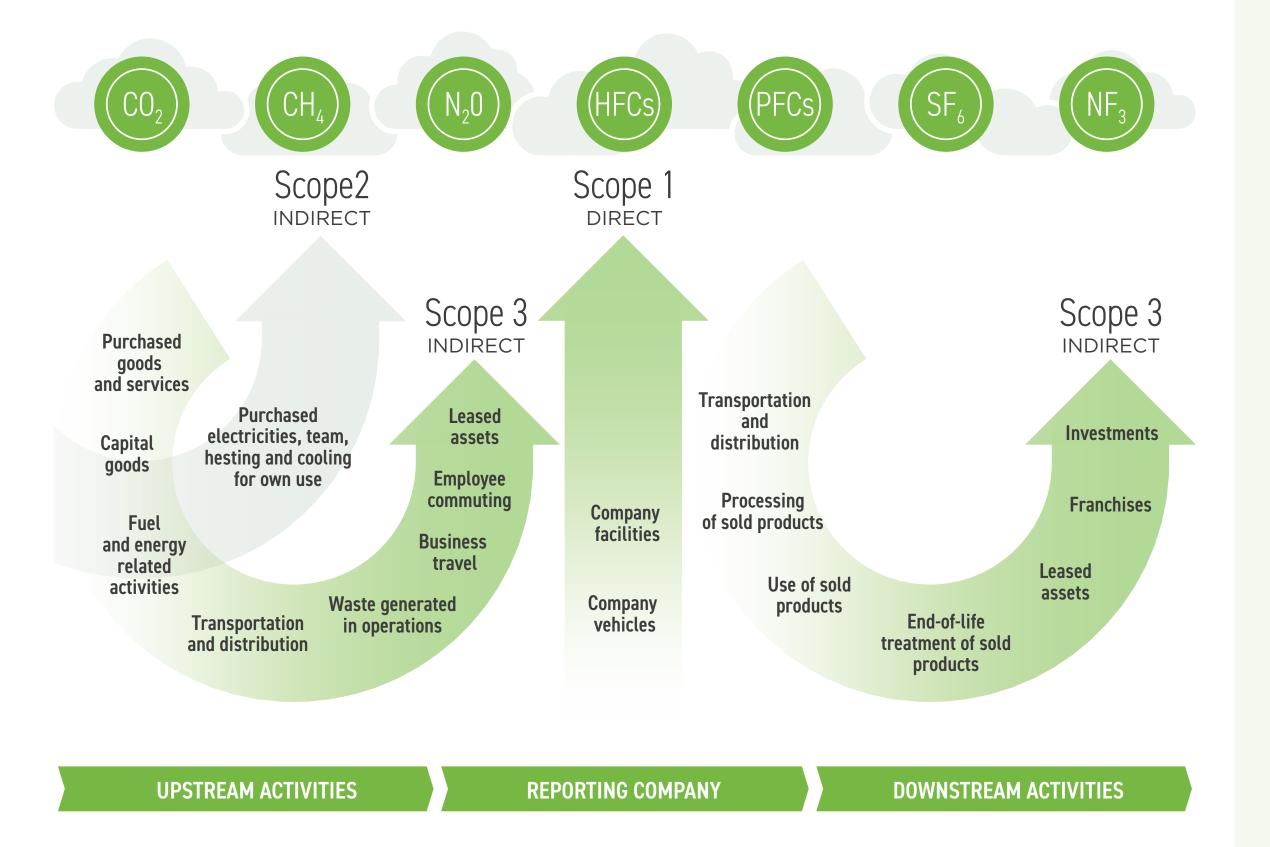


### CARBON FOOTPRINT: CALCULATION OF AMB GHG EMISSIONS

Climate change is a major global issue and is closely linked to GHG emissions.

As a first step to develop an effective decarbonization strategy, it was necessary to know where we were starting from. In 2022 we carried out an ambitious calculation of our carbon footprint.

So far, we have effectively calculated Scope 1 emissions (direct emissions), Scope 2 emissions (indirect, derived from electric energy consumption) and reporting Scope 3 emissions (other indirect emissions, derived from the) across our Italian, UK and German divisions. This knowledge will allow us to identify new climate risks, as well as to establish feasible reduction targets. We have followed the structure, methodology and requirements proposed by the ISO 14064-1 standard for calculating and reporting Scope 3 emissions.



GHG Protocol Scope	ISO 14064- 1:2018 Category	Direct/Indirect emissions and removals	Example Sources
			Fuel use
Scope 1	Category 1	Direct GHG emissions and removals	Refrigerant leakages
		and removats	Direct emissions and removals from land use
Scope 2	Category 2	Indirect GHG emissions from imported energy	Purchased energy
			Business travel
			Staff commute
			Freight transport
	Category 3	Indirect GHG emissions from Transportation	Transport of clients and visitors
		Tom mansportation	Downstream transport and distribution losses
			Refrigerant use (from chilled transport or air conditioner)
			Upstream emissions from fuel manufacture and distribution (well-to-tank)
	Category 4		Electricity transmission and distribution losses
			Working from home
		Indirect GHG emissions	Water supply and wastewater treatment
Scope 3		from products	Materials and waste
		an organisation uses	Emissions generated through leased assets
			General services used i.e., cleaning, consulting, maintenance, mail delivery, bank etc
			Upstream leased assets
			Total expected lifetime emissions of the product sold
	Category 5	Indirect GHG emissions	End of life stage emissions
	Category 3	(use of products from the organisation)	Downstream franchises/leased assets
			Emissions from investments (targeting private or public financial institutions)
	Category 6 Indirect GHG emissions (other sources)		Specific emissions or removals which cannot be recorded in any other category. It is the organisations responsibility to define the content of this category

GRI 305-1: Direct (Scope 1) GHG emissions (tCO <sub>2</sub> e)	2020*	2021*	2022	
Total Emissions Scope 1	507	517	384	
GRI 305-2: Energy indirect (Scope 2) GHG emissions (tCO <sub>2</sub> e)	2020*	2021*	2022	
Total Emissions Scope 2	17,743	19,135	15,023	
GRI 305-3: Over Indirect Scope (Scope 3) GHG emissions (tCO <sub>2</sub> e)	2020*	2021*	2022	
Total Emissions Scope 3			230,730	

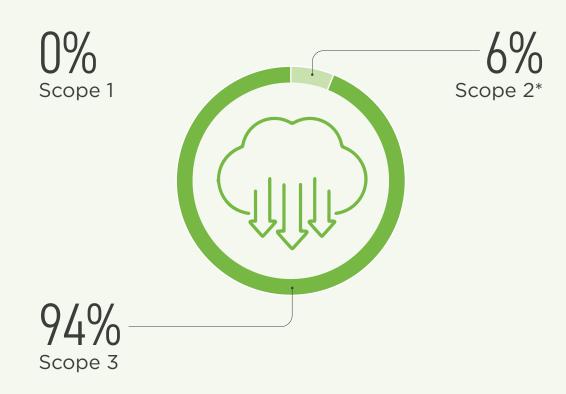
\* It is worth noting that 2020-2021 data has been updated, compared to the 2021 AMB Sustainability Report, after the removal of the tooling division from the data perimeter.

For 2020 and 2021, Scope 1 and 2 were calculated starting from the emissions factors provided by the Association of Issuing Bodies and British national energy agencies (AIB and DEFRA).

The location-based method was applied.

For the year 2022 Scope 1,2,3 emissions were calculated (following the UNI EN ISO 14064:2019) for UK, Italy and Germany divisions.

### GHG EMISSION - AMB GROUP 2022 GHG PROTOCOL SCOPES



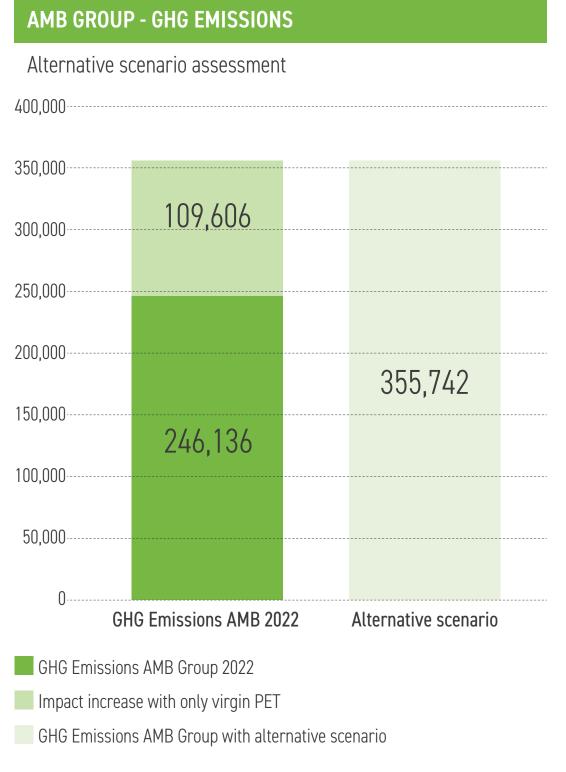
GHG Protocol Category	AMB Group 2022 tCO <sub>2</sub> e
Scope 1	384
Scope 2	15,023
Scope 3	230,730
Total t CO <sub>2</sub> e	246,136

\*Location based approach



Our carbon footprint mapping process shows that our **GHG Scope 3 accounts for about 94 percent of our total value chain impact**, which is why we are in the process of setting a reduction strategy to reduce our carbon footprint emissions.

According to the study carried out on the Carbon footprint, if the amount of recycled PET flakes was completely replaced by virgin PET (alternative scenario), the impact increase would be about 109,606 t CO2e. This would consequently bring an increase of about 45% compared to the current scenario (246,136 t CO2e), for a total of GHG emissions equal to 355,742 tCO2e in the alternative scenario.





# O6.1 EMPLOYMENT, DIVERSITY AND SKILLS DEVELOPMENT





## IMPROVE EMPLOYEE RETENTION, DEVELOP AN INCLUSIVE WORK ENVIRONMENT, BUILD SKILLS AND DEVELOP TALENT

AMB employees are the core of our business. We pursue productive and successful employment relationships because we believe that each employee's well-being is key to our success. We are committed to constantly improving health and safety in the workplace, and to promote diversity and inclusion. AMB offers professional growth opportunities by providing training courses to develop both technical and management skills. Annually, we identify competence gaps that need be filled and the candidates who can be trained to step up their contribution to the company's performance. AMB's training also involves stakeholders such as suppliers and customers. Every training event is also an opportunity to build relations among participants to deepen internal and external connections. We strongly believe that all these initiatives reinforce the passion that motivates us to achieve ambitious goals.



### 3W

### 06.1.1 MANAGEMENT APPROACH TO THE TOPIC

Our commitment to a positive work environment, diversity, and skills development is directly and continuously supervised by our management team.

The Human Resources department is tasked with monitoring specific KPIs, such as staff turnover, absenteeism, etc., as well as carrying out periodic evaluation processes.

The policies and procedures governing the relationship between employees and the company are available for consultation.

In 2022 we instituted a new performance appraisal process that invites users to suggest improvements.

To further promote dialogue, regardless of professional category, in 2022 we also introduced **AMB Town Hall Board Business Review**, a quarterly meeting of all employees and the AMB Board to better communicate where the company stands and where it is heading.

### PERFORMANCE APPRAISAL PROCESS



**1.** Employee self-evaluation and setting of objectives.



**2.** Goal setting meeting: supervisor reviews employee self-evaluation, skills and objectives.



**3.** Mid-year review: assess objectives and evaluate progress.



**4.** Final comments or revision by employees and supervisor; supervisor gathers employee performance data and completes evaluation.



**5.** Development and training plan: to define initiatives for next year's training and performance evaluation.

The Manager, employee and HR department each receive a copy of the completed appraisal.

### PEOPLE DEVELOPMENT AND ONBOARDING PROCESS

Training programmes and performance evaluations we carry out each year are fundamental for developing technical and leadership skills and for identifying professional growth paths for key positions.

An **onboarding mentoring programme** was started in October 2022 to improve employee retention and to develop an inclusive work environment. The program involves three full days (3.5 for white collar employees) of lectures, facility tours and Q&As conducted by representatives from 14 different departments. The training also covers sustainability and ESG topics.

### **Key onboarding objectives:**

- Build the employee's understanding of the organization.
- Ensure that employees understand their role, how they contribute to their team, and how they and their team add value to the organization.
- Build employee knowledge of the functions, processes, and skills required for succeding in their role.
- Increase employee retention.
- Ensure that employees can perform their critical functions and roles.

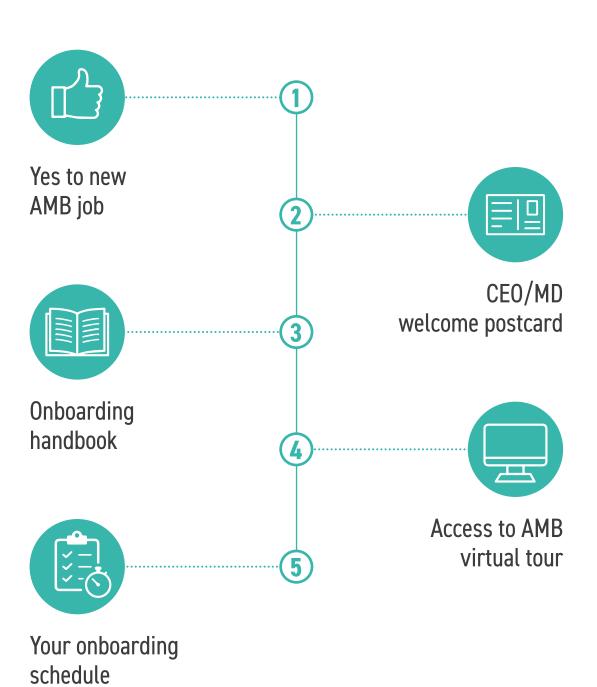




## PREBOARDING PROVIDES THE OPPORTUNITY FOR ENGAGEMENT AT THE START OF A NEW EMPLOYEE RELATIONSHIP

Perception building of AMB as a business starts before a new employee steps into our builds.

Employees who are engaged are the ones who have bought into our values and mission. They feel valued and listened to. They stay longer with the business. It's our role make sure the processes and support systems are in place to accompany employees on their first day and every day after that.



### DEFINE AND CAPTURE ALL THE AREAS OF THE AMB ONBOARDING CONTENT JOURNEY IN ONE PLACE (All onboarding content in a logical order to support better adoption of final training)

	WEEK 1		WEEK 2		
Onboarding areas:	1. Getting you set-up	2. Safety for you, and our customers	3. Understanding who we are - AMB	4. Understanding how we operate	5. Your training program
	HR meeting welcome	Safety training	The AMB brand	Cast & blow overview	Specific training program against job role if required
	Onboarding schedule review	What food safety means to our customers	AMB internal values What we do, product range	Printing & converting overview	
	Office/work area show around	BRC training	Innovation and sustainability		
B <del>LUÉ</del> COLLAR	ICT set-up & security	Quality understanding and training	Understanding our organizational structure	Slitting overview	Appraisal documents review
COLLAIN	NOI APP set-up	Uniform handout	Potential visit to other sites		Long term Training objectives
	Key contacts	House keeping	Ethics policy		Defining KPIs

### THE CORE OF THE ONBOARDING PROCESS SHOULD STAY THE SAME BETWEEN TO TWO GROUPS OF WORKERS

	WEEK 1		WEEK 2		
Onboarding areas:	1. Getting you set-up	2. Safety for you, and our customers	3. Understanding who we are - AMB	4. Understanding how we operate	5. Your training program
	HR meeting welcome	Safety training	The AMB brand	Cast & blow overview	Specific training program against job role if required
	Onboarding schedule review	What food safety means to our customers	AMB internal values What we do, product range	Printing & converting overview	
	Office/work area show around	BRC training	Innovation and sustainability		
WHITE	ICT set-up & security	Quality understanding and training	Understanding our organizational structure	Meeting with purchasing	Appraisal documents review
COLLAR	NOI APP set-up	Uniform handout	Management /your manager	Meeting with warehouse and logistics	Long term Training objectives
	Key contacts	Full site tour	Potential visit to other sites	Meeting with finance department	Defining KPIs
		House keeping	Ethics policy		





Training activities are aimed at increasing, transferring, and monitoring the technical skills that are key for AMB, by consolidating the experience and knowledge gained by senior employees and ensuring the quick integration of incoming talent.

The **AMB** in **Vision** project offers managers specific training and coaching to stimulate new approaches and perspectives in areas such as strategy, innovation, sustainability, employee development and operational excellence.

AMB in Vision includes team building exercises to promote collaboration, foster communication, create team identity, value individual skills and promote an inclusive work environment.





	202	0	2021		20:	22
GRI 404-1: Average hours of training per year per employee	Total	Average	Total	Average	Total	Average
Total hours of training	3,130	8.17	2,985	8.00	2,440	6.51
Hours of training divided by:						
Men	2,595	8.06	2,341	7.55	2,021	6.58
Women	535	8.77	646	10.25	419	6.16
Executives	144	24.00	38	7.60	88	10.94
Managers	304	13.82	54	2.57	121	5.77
Office Staff	490	5.90	1,201	14.30	526	5.59
Production-site Workers	2,192	8.06	1,693	6.44	1,705	6.77

The data refers to the entire AMB Group

## 06.1.2 EMPLOYMENT

Most of our employees are based in Italy at our two factories in Amaro and San Daniele del Friuli (almost 64%). **AMB has recently grown significantly through acquisitions**. The most important one was in 2019 in Newcastle (UK) which expanded our staff, mainly in production.

In addition to our workforce, we employ up to 16% of temporary workers to satisfy peaks in demand or for specific operations. Contractors are also used for warehousing and product grinding activities on the Italian site.

Most employees work full-time (more than 97%).
Part-time arrangements are used to satisfy personal needs or other specific circumstances.

To promote a positive work environment, our employees are hired with **permanent contracts** (almost 98%).

GRI 2-7 Employees		2020			2021			2022	
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees	322	61	383	310	63	373	307	68	375
Permanent employees	318	58	376	308	61	369	302	64	366
Temporary employees workers	4	3	7	2	2	4	5	4	9
Non-guaranteed hours employees	0	0	0	0	0	0	0	0	0
Full-time employees	321	45	366	310	51	361	306	58	364
Part-time employees	1	16	17	0	12	12	1	10	11

The data refer to the entire AMB Group

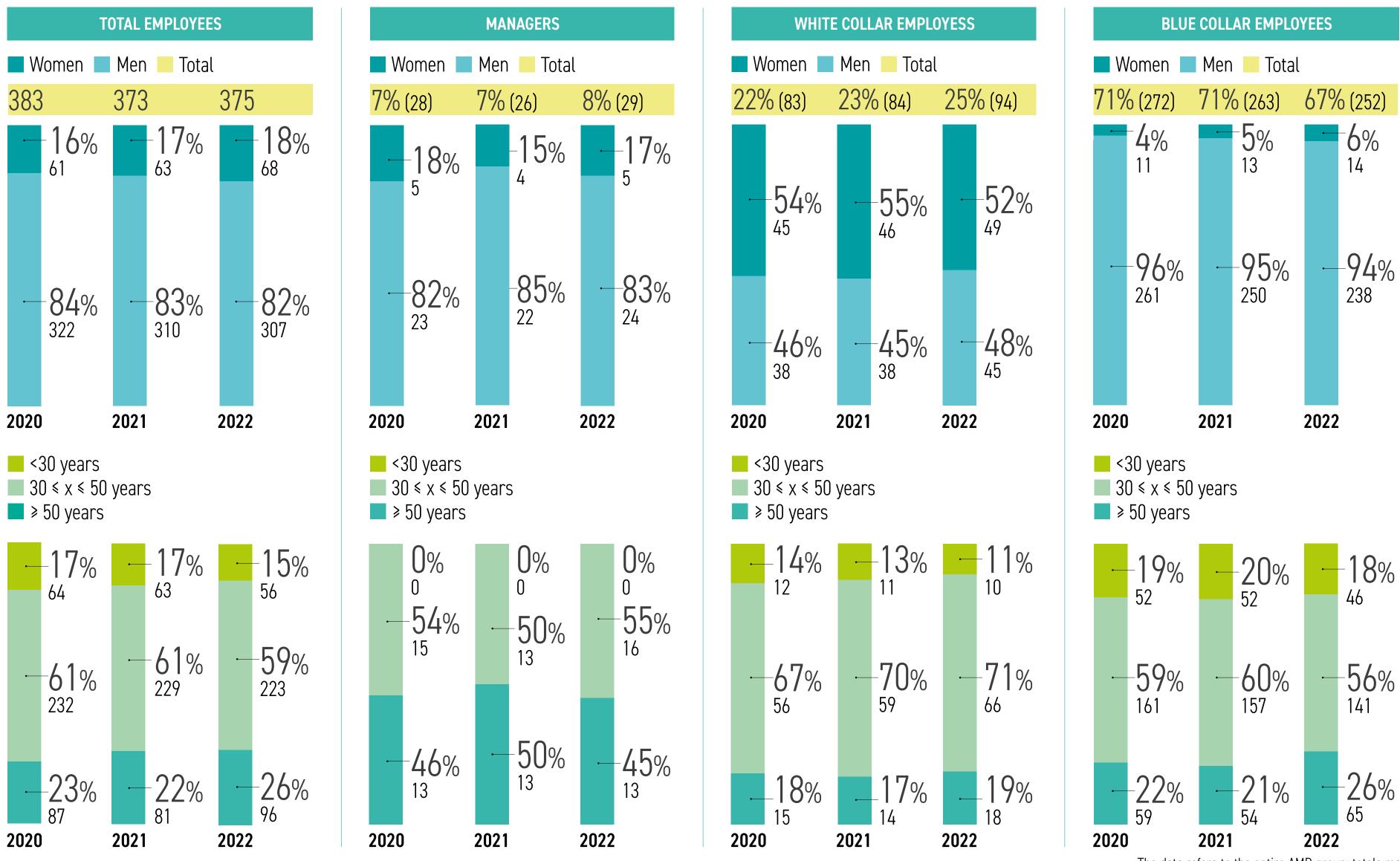
GRI 2-8 Workers who are not employees		2020			2021			2022	
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Workers who are not employees	55	10	65	57	10	67	62	9	71

The data refer to the entire AMB Group



### SWS

### **GRI 405-1 DIVERSITY OF EMPLOYEES**

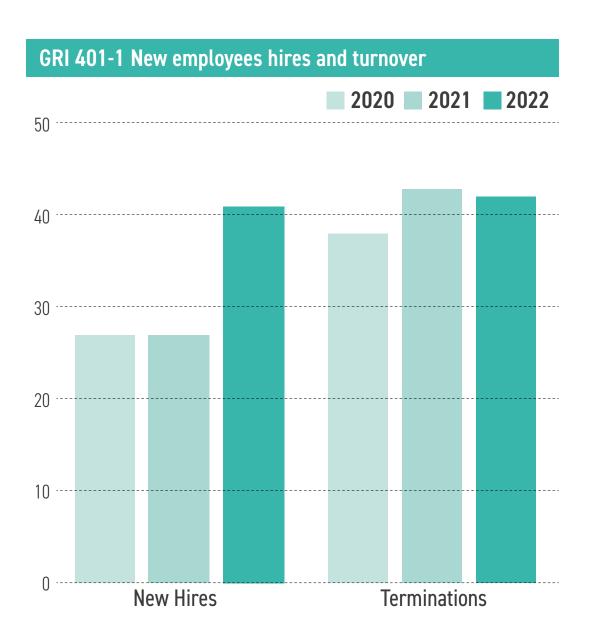




All the contracts of Italian plant employees fall under the plastic and rubber national industry agreement (CCNL Gomma Plastica Industria). No industry agreements are in force in UK and Germany.

GRI 2-30: Collective bargaining agreements	Italy			UK			Germany		
	2020	2021	2022	2020	2021	2022	2020	2021	2022
Employees covered by collective bargaining agreements	260	244	240	0	0	0	0	0	0
Total employees	260	244	240	118	124	129	5	5	5
% of total employees covered by collective bargaining agreements	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A

The data refer to the entire AMB Group



### **AMB** recruiting initiatives

AMB participated in the **Carnia Job Day 2022**, an event that brings together companies and job seekers in the Carnia territory around Udine. AMB presented its activities to attract new people to the plastic packaging industry.

### **CARNIA JOB DAY 2022**

The recruiting event took place in Amaro, organized by Umana and the Friuli Venezia Giulia Region in collaboration with Carnia Industrial Park, and gathered public and private entities with the aim of matching job-seekers with the numerous open positions and opportunities in the area.

- Over 200 job interviews for students and unemployed people
- Over 240 pre-registrations
- 18 local companies looking for professionals and new collaborators
- 4 seminars and meetings on the themes of work, the rules and tools of the market, introduction to the world of work, and research

#### CARNIA INDUSTRIAL PARK'S MISSION

To create stable and favourable conditions for the economic, technological and competitive development of the businesses operating within the Park and to help the area to become more internationally oriented.



Several new HR initiatives were implemented in 2022 under the AMB retention program:

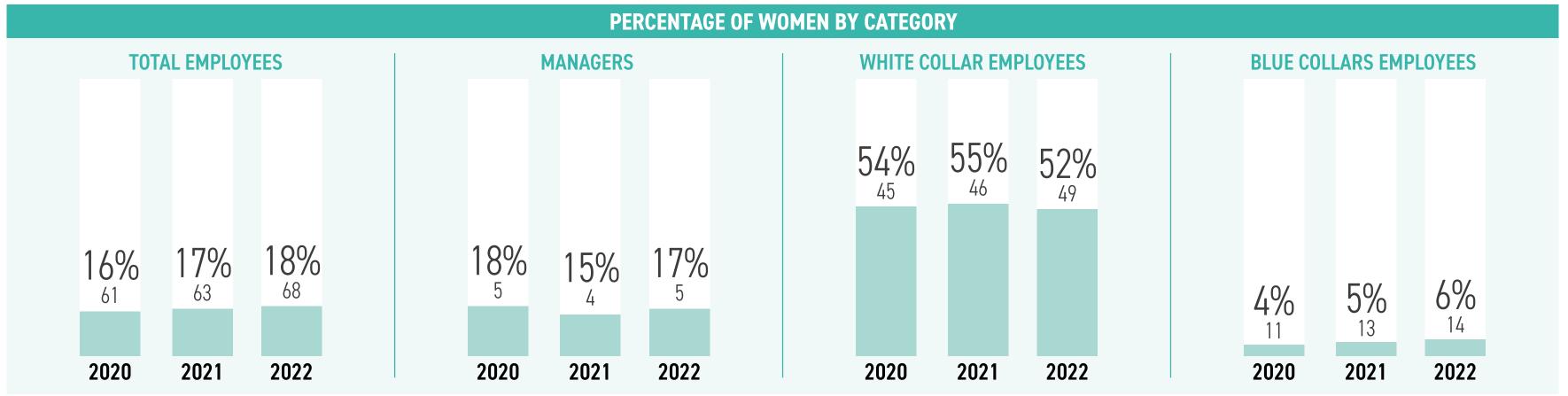
- Training course and professional development programs.
- **Onboarding process** started in October 2022 in the Italian site.
- **AMB Happy Hours.** In September 2022, we started organizing recurring corporate "Happy Hours" in local venues, open to all staff members, with the aim of team building.
- **Welfare:** The Italian division handed out fuel bonuses in December 2022 and increased the value of restaurant tickets from 1 July 2023.
- In 2022, an **exit questionnaire** was introduced to research the causes of departures and to implement improvements.
- **) AMB In Vision** project.
- **AMB Town Hall** (quarterly communication on company status from the Board to all employees).



## 06.1.3 DIVERSITY AND EQUAL OPPORTUNITY



Our company and recruitment processes are **open to everyone**. Despite our heavy production processes, we have invested to improve working conditions to be able to hire more women in a safer working environment. In addition, we approved an **Equality Policy** that defines the company's stance on equality of opportunity: the document is compliant with UK statutory requirements and is available via the Employee Handbook. The policy's first purpose is to ensure we do not unlawfully discriminate under the Equality Act 2010. We encourage equality, diversity, fairness and inclusion among our workforce, whether temporary, part-time, or full-time, and work to eliminate any kind of discrimination. AMB is strongly committed to promoting equal opportunities in all our locations worldwide.



Our commitment towards diversity and inclusion also involves vulnerable minority groups. In Italy, AMB has formal agreements with the Employment Centre for hiring of people with disabilities. In 2022, 11 employees worked in our facilities in line with criteria provided by the Italian Law "68/99" and with agreement with the Provincial Government's Labour Office.

CDI / OF 1 Diversity of employees	des	20	20	20	21	20	22
GRI 405-1 Diversity of employees	udm	n	%	n	%	n	%
Total number of employees	n	260		244		240	
Number of people with disability	n	10	3%	10	3%	11	3%
Men	n	6	60%	6	60%	6	55%
Women	n	4	40%	4	40%	5	45%
< 30 years	n	0	0%	0	0%	0	0%
30 ≤ x ≤ 50 years	n	4	40%	4	40%	6	55%
> 50 years	n	6	60%	6	60%	5	45%

The data refers to the Italian division



# 06.2 OCCUPATIONAL HEALTH AND SAFETY AND WELL-BEING

This topic involves the promotion of a "safety first" culture in the workplace, developing effective risk management and promoting preventive safety measures. It also refers to voluntary company actions to support employee work-life balance and well-being.

Our objective is that 100% of AMB's activities are carried out under safe conditions, which is particularly relevant in production, with its greater risks of accidents. Health and safety measures involve all workers, contractors, and visitors in all manufacturing sites, warehouses, offices, or other locations. Our policies and measures are constantly reviewed as we work towards the goal of zero high-consequence injuries and accidents.

### OCCUPATIONAL HEALTH AND SAFETY AND AMB MANAGEMENT SYSTEM

Constant measures are taken and reviewed to ensure the **health**, **safety**, **and well-being** of our employees, and all those who are involved in our activities.

Occupational health and safety begins with compliance with national and international law on safe workplace (for example, Italian D. Lgs. 81/2008, European REACH regulation, European CLP regulation). We implemented a supervisory system, pursuant to Legislative Decree 231/2001, and a Supervisory Board, which monitors compliance in the workplace and aims to prevent any possible infringements.

We will also provide additional levels of safety through the implementation of an **Occupational Health and**  Safety Management System (OHSMS), aligned with the provisions of the international standard UNI EN ISO 45001:2018, which covers workers, contractors, and visitors in all manufacturing sites, warehouses, offices, or other locations. We plan to begin implementing ISO 45001 for the UK division in 2023. Our current system is based on a HSE management structure, consisting of policy, organisation, planning, management, and review. AMB is subject to internal auditing and, on occasions, by external stakeholders or certain agencies. While these systems are legally required, we are mainly driven by our commitment to best practices in the domain and to provide all the necessary training and information required for employees to effectively carry out their duties in a safe and healthy manner.

The data shows that the company's internal audits cover as many workers as possible.

Health and safety is managed by the HSE manager for each plant, who is tasked with planning, control, and implementation.

We also have a structure of qualified managers and supervisors who ensure safety at the operational level and develop additional measures in collaboration with workers' safety representatives.

GRI 403-8: Workers covered by an occupational health		2020		2021		22
and safety management system - Employees	n	%	n	%	n	%
Total number of Employees	378		367		375	
Total number of employees covered by an occupational health and safety management system	378	100%	367	100%	375	100%
Total number of employees covered by an occupational health and safety management system internally audited	378	100%	367	100%	369	98%
Total number of employees covered by an occupational health and safety management system audited or certified by an external party	118	31%	0	0%	129	34%

The data refer to the entire AMB Group

GRI 403-8: Workers covered by an occupational health and safety	20	20	20	021	20	)22
management system - Workers who are not employees	n	%	n	%	n	%
Total number of Workers who are not employees	53		69		71	
Total number of Workers who are not employees covered by an occupational health and safety management system	23	43%	25	36%	71	100%
Total number of Workers who are not employees covered by an occupational health and safety management system internally audited	23	43%	25	36%	50	70%
Total number of Workers who are not employees covered by an occupational health and safety management system audited or certified by an external party	0	0%	0	0%	0	0%

The data refer to the entire AMB Group

Periodic briefings are held to update employees and to monitor production processes. They are announced via staff notice boards and emails to ensure a high level of participation. Workers are encouraged to actively participate in developing a healthier and safer workplace, both during these meetings and through dedicated channels, such as email or direct talks with HSE representatives.

### We monitor our health and safety performance through frequently reviewed KPIs and related targets which are benchmarked against industry peers.

Injury data for employees and contractors are constantly monitored at both Group level and at individual sites, and systematically reported up the chain of command. Accidents, as well as near misses, are subject to detailed analysis, and any necessary corrective and preventive actions are taken.

### OCCUPATIONAL HEALTH AND SAFETY PROMOTION

External medical and technical staff regularly visit production sites to supervise and evaluate working conditions and related risks. Mandatory medical examinations by accredited medical professionals take place in the company workplace, during working hours. The frequency of these examinations is based on the risk assessment of each specific function. If needed, we organise further diagnostic tests in private facilities at our own expense.

Training is another important tool to promote health and safety culture. Every new employee undergoes initial classroom training and specific departmental training, followed by an exam. The process is repeated at every job change. Since October 2022, the Onboarding program in Italy has also covered health and safety training.

Additional training is provided for employees that oversee health and safety management or at-risk operations, such as supervisors, worker representatives, fire-fighters, first-aid officers, fork-lift truck and aerial platform operators.



Training is designed by the Health Safety and Environment (HSE) office based on legal requirements, worker needs and the company's evolution. Some training is carried out at the company or in designated classrooms by our qualified trainers, while others are held at accredited local training organisations. The effectiveness of the training processes is evaluated through interviews and observations by the company managers.

Members of our supervisory teams have also undertaken specific Safety Management courses (IOSH) to help improve our health and safety processes.



### 06.2.1 RISK ASSESSMENTS

All work task are subject to quantitative and qualitative risk assessments, which are carried through cooperation of the Health and Safety office, the occupational doctor appointed by the company and worker safety representatives. The evaluation is performed for all new activities and periodically for existing activities – if the working processes remain the same, the evaluations are performed every three years. All company activities and sites are also monitored through periodic audits carried out both by qualified internal company staff and by external parties. Specific assessments are carried out following accidents, near misses, or reports from workers or supervisors. Health and safety reports are released through the IT manufacturing management system or via email, and are always signed by the involved worker, so that the worker and the specific supervisor can assess what action needs to be taken.

Identified risks are mitigated to prevent any possible accidents.

Collective or individual training, as well as the Health and Safety Office's training, ensures that risks are identified and dealt with before they can lead to dangerous situations.

External workers are informed of risks every time they enter company premises.

### **INJURIES AND ACCIDENTS**

Accident rates are monitored daily at the operational level, and monthly by the Board of Directors and our managers. **The commitment towards zero-accidents** is proved by activites performed to prevent any risk in the organisational processes and by periodic audits of work phases and machine safety, observation of worker behaviour and an active feedback system that involves everyone in the organization.

Work-related accidents are reported in two main ways:

- ) by the employee alerting his/her direct supervisor
- through logbooks that are available in various prominent locations across the site.

All verbal and written reports are given to the HSE Manager, immediately if the accident or injury is urgent or serious. If necessary, the Food

Safety Manager and the Maintenance Manager are also involved. This broader view allows for a multidisciplinary evaluation. All events are recorded on specific IT systems and corrective actions are identified, implemented, and monitored.

Common injuries include muscle strains, cuts, abrasions, and slips/trips/falls or fractures. Injuries related to machinery are limited both in number and in severity, reflecting our commitment to prevention. In the reported period, we assessed potential machinery-related risks and implemented improved access systems, interlocks and stop sensors

CDI 402 0: Work related injuries Employees	202	0	202	21	2022	
GRI 403-9: Work-related injuries - Employees	n	Rate	n	Rate	n	Rate
Recordable work-related injuries at 31.12	14	3.99	10	2.85	7	2.27
of which fatalities	0	0.00	0	0.00	0.00	0
of which with high consequences	0	0.00	0	0.00	0.00	0
Hours worked	700,922		702,123		615,472	

The data refers to Italian and UK division

GRI 403-9: Work-related injuries - Workers who are not employees	20	20	20:	21	2022	
- Workers who are not employees	n	Rate	n	Rate	n	Rate
Recordable work-related injuries at 31.12	1	4.42	1	3.64	2	3.26
of which fatalities	0	0.00	0	0.00	0.00	0
of which with high consequences	0	0.00	0	0.00	0.00	0
Hours worked	45,287		54,946		122,640	

The data refers to Italian and UK division



- --- Employees Injury Rates
- Workers who are not employees Injury Rates

7.00





### 06.2.2 WELL-BEING

All employees have access to benefits prescribed by respective national laws, such as sickness and injury coverage, and standard retirement provisions. These benefits also extend to temporary workers. Since the Italian plant falls under the plastics and rubber national industry agreement, AMB Italian employees can opt to join the agreement's supplementary retirement and healthcare funds.

### Recently we've focused on work-life balance initiatives to promote well-being.

Since 2019 office staff in Italy have benefited from **flexible working hours**, allowing them to modify their daily work hours (flexible clock-in and clock-out times, flexible lunch break of 30, 60 or even 90 minutes).

In 2019, AMB introduced a **corporate welfare plan** for its Italian employees, which it then extended to subsequent years. With the agreement of the internal union, a provision was introduced that accorded workers who voluntarily apply to the plan the possibility of converting their entire annual performance bonus into welfare credits to be spent on a special web platform for various benefits and services (transportation, school and university fees, and expenses).

The benefits are tax-free under articles 51 and 100 of the Consolidated Income Tax Act – (*Testo Unico delle imposte sul reddito*). In 2022, around 27% of employees benefited from this program.

In addition, in December 2022 all Italian employees received a fuel bonus to help cover the energy price increases that affected Italy in 2022.

Starting in 2022, the BRC (British Retailers Consortium) certification bonus has also been disbursed via welfare credit, in this case to all recipients.

All UK employees have access to benefits including family-based provisions, sickness benefits, leave of absence, and pensions. A small number of employees have additional legacy benefits, such as private medical and life assurance.

In 2022, AMB UK HR reviewed the package offered to its employees, resulting in additional benefits being implemented to support the wellbeing of employees, especially after COVID-19.

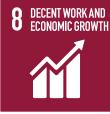
AMB upgraded its **workspaces** to improve working environment and conditions.





# 07.1 VALUE CREATION













### **CUSTOMER SATISFACTION**

We believe that AMB's strength lies in our ability to rise above the typical commodity and B2B mindset to offer our clients products and services with higher added value. Our highly professional workforce includes many specialists in process engineering, continuous improvement, innovation, research & development, food quality, design, and last but by no means least, sustainability.

We are committed to strengthening partnerships with our customers and assisting them to develop new solutions by providing the support they expect for their operations.

This topic refers to the attention paid by the company to satisfying the needs of customers, retailers, and end-users.

Each task must be designed and performed to ensure customers receive the best products and the best services. To keep improving, we continuous collect feedback.

Customer satisfaction is the leading indicator to measure customer loyalty, identify unsatisfied customers, promote customer retention and increase revenue. For AMB it is also a key to attracting new clients in a competitive business environment. Our reputation is our strength, and customer satisfaction is a key driver for growth.

LINE: USER

Product excellence requires continuous investments to improve processes, materials, products and services. We seek innovation and eco-design without compromising performance and safety. We are constantly in touch with our clients and vary our production times to meet their needs.

Customer Satisfaction is pursued through four core values that drive our operations:





Service





Design

We have implemented several measures linked to improving customer satisfaction:

- Research, analysis, and definition of the essential values for customers.
- Designated systems for feedback: listening to the voices of our customers (VOC) and our stakeholders in terms of innovation, safety and sustainability.
- ) Dedicated sales team for each market served, who constantly analyse the perceptions of the company.
- A formal procedure for Customer Satisfaction, compliant with the ISO 9001:2015 standard.
- Streamlined work methods while removing waste and reducing variation (Lean Six Sigma);
- Introducing modern organisational approaches that combine technology, automation, skills and guaranteed quality.
- Constant staff engagement and training, to foster their abilities.

In 2022 we started a **customers segmentation** project that allows for more targeted communication and a deeper connection between the company and the customer, which:

- Identifies the best leads and prospects
- Focuses on the right sales opportunities
- Provides better service

Because of these new projects, we updated our customer satisfaction KPIs to make it more effective. The new KPI is the OTP (On Time Performance). As a result, 2022 was the last year we measured the Customer Retention Rate (CRR) that reached our previous target of 85%, in line with 2021's results.

#### IMPROVE LOGISTIC AND DELIVERY PERFORMANCE

One of the most important KPIs in terms of service is **OTIF** (On Time in Full) which measures the percentage of orders that have been successfully fulfilled.

- ON TIME: with the delivery terms set with the customer
- IN FULL: with the products and quantities requested

During 2022 we launched a project to bring **OTP** (**On Time Performance**) to **at least 95%** by 2025. We closed the 2022 year with an OTP of 90% at group level.

Among the measures put in place were improvements in production planning through optimised loadings and improved delivery performance.

We also measure customer satisfaction through periodic surveys.



The 2022 survey was sent to over 600 customers, a much larger pool than the previous one in 2019, due to the growth of the business over the period. This latest survey was conducted online and included new questions. Insight into AMB products, services, and applications remained the fundamental base of the survey, but we added new questions that aligned with our ESG strategy and sustainability. Some key highlights:

- Overall quality of AMB products
- AMB's ability to deliver On Time in Full
- AMB's employment, diversity and skills development● ● ○
- AMB's product quality and safety
- ) AMB's circularity, eco-design and attention
- to product lifecycles
- AMB's energy and emission efficiency





# 07.2 SUPPORT TO LOCAL COMMUNITIES

We are committed in supporting initiatives and projects that:

- Help the most vulnerable people
- Support local communities and drive the creation of employment opportunities
- Protect regions, the environment and biodiversity
- Foster employment and integration, also by promoting educational and training programs.





### SUPPORT TO PEOPLE IN DIFFICULTY AND PROMOTION OF CHARITY INITIATIVES

I bambini delle Fate is a social association that since 2005 has supported projects and social inclusion efforts managed by local partners for the benefit of families with autism and other disabilities. https://www.ibambinidellefate.it/

In 2022 AMB engaged in regular monthly fundraising activities.

### The project

#### LA BANCA DEL TEMPO SOCIALE A UDINE

"I Bambini delle Fate" (Children of the Fairies) offers friendship opportunities for disabled children, who are often lonely, as well as social gatherings for students of the "Arturo Malignani" institute. The collaboration is handled through the Hattiva Lab Onlus Social Cooperative, which coordinates activities for all the participants. The association assigns each participant a monthly score from 1 to 5 which is communicated to their school for the use of training credits and the delivery of a "Scholarship" for Bambini della Fate.

### **SOME PICTURES OF THE ACTIVITIES**

















### SUPPORTING LOCAL COMMUNITIES AND TERRITORY

In 2022, AMB in the UK partnered with Bantam Materials UK Ltd. to source and include 30%

Prevented Ocean Plastic™ in certain products.

In this initiative, discarded plastic bottles are picked up from areas at risk of polluting oceans, and taken to local collection centres. After sorting, the bottles are pressed and sent to recycling factories where the plastic is processed into raw material flakes, according to European quality standards.

AMB supports the collection of PET bottles in countries where the risk of plastic environmental dispersion is very high and where it can provide income for poorer populations.

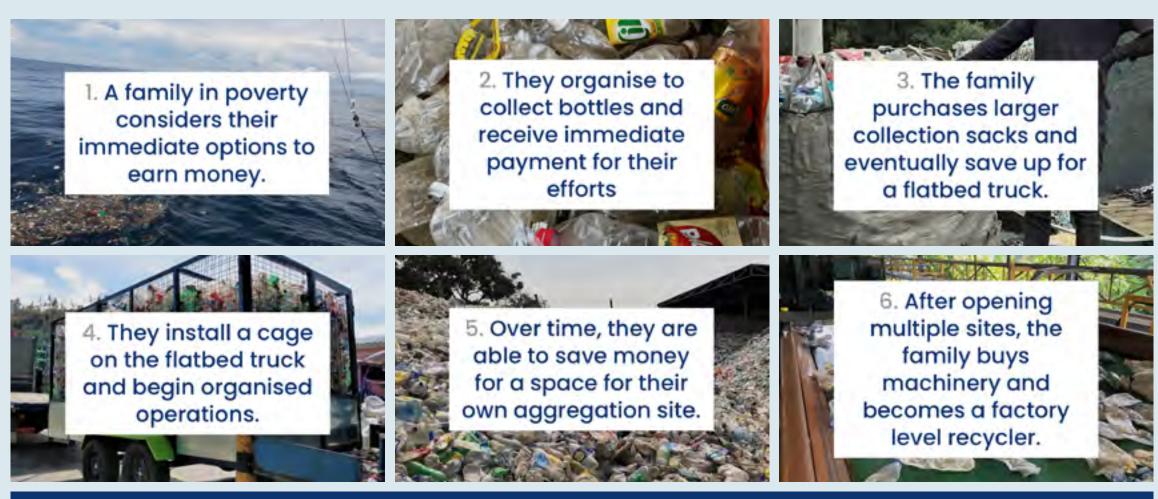
Without industry demand and economic incentive, recycling activities in developing countries will not happen.

### **BOTH ENVIRONMENTAL**



7. As a result, the bottle is recycled and prevented from making it's way to the environment / ocean / landfill.

### **AND SOCIAL BENEFITS**



7. Opportunity is created to either meet basic needs or develop a small business.

## FOSTERING EMPLOYMENT AND INTEGRATION THROUGH EDUCATIONAL AND TRAINING PROGRAMS

As part of a project in 2022, AMB teamed up with the local Government office of

Federmanager (industrial executives association) to visit local high schools to meet with students and to support their introduction to their future jobs.

One of the treated matters was how to run business meetings correctly and effectively.

Students also learned how to prepare for a job interview, which included simulated interviews with local managers from the Federmanager trade association. The students had to answer the questions in Italian and in another European language.





# O7.3 PRODUCT QUALITY AND SAFETY

### **GUARANTEEING SAFETY AND PRODUCT QUALITY**

AMB guarantees the best quality control systems, with full respect of all regulations related to food contact materials. We believe that product quality and safety are essential to building customer loyalty and sustainable business growth.

Product quality and safety are guaranteed through the whole supply chain – from raw material suppliers selection up to final customer delivery - carefully managed throughout all company functions and processes.

In food packaging, priority should always be **food safety and consumer protection** – two elements that
can never be understated. **Plastic packaging is all about health and safety**.

We maintained all our quality certifications in 2022. Our processes are certified according to the international standards Brand Reputation Compliance Global Standards (BRCGS) and ISO 9001:2015 that guarantee high quality and monitor safety levels.

The Quality Control department and its managers are responsible for managing product quality and safety, along with the Hazard Analysis Critical Control Point team (HACCP). We continuously work to improve to work our quality and safety performance.

In 2022, UK production sites upgraded their quality system by the introduction of a quality board for a more effective information and communication to efficiently implement new standard operating procedures (SOP'S).

Following the results of the 2021's Quality and Food Safety Culture Survey, in 2022 AMB Italian facilities continued the improvement project by upgrading training plans, equipment and process performances and information collection and sharing. We run flash meetings in our production departments to increase the awareness and the involvement of the shop floor personnel on quality and food safety topics to improve the effectiveness of our initiatives and projects.







New or updated legislations came into force in 2022, in particular Regulation (EU) 2022/1616 of September 15, 2022, which covers recycled plastic materials and objects intended to come into contact with food, and repeals Regulation (EC) no. 282/2008.

AMB keeps abreast of regulatory changes to ensure we remain in compliance with the most recent legislation to ensure our products are food safe.

No incidents of non-compliance with regulations (resulting in a fine, penalty or warning) were cited in 2020-2022 by national authorities. Incidents (as defined by internal standard procedures) in the last three years were cited only against voluntary codes, and were internally managed without compromising quality and safety of sold finished products.

The UK division recorded zero incidents in 2022. The Italian unit reported two incidents of non-compliance with voluntary codes involving contaminations of semifinished products in the San Daniele plant. The first incident was physical contamination resulting from non-adequate maintenance; the second one involved biological contamination of some materials in the semi-finished products warehouse.

They were rectified following standard procedures. The area was isolated, the potentially contaminated material was identified and treated, and the area was then thoroughly cleaned and fixed. The causes of the incidents were analysed and corrective action taken to avoid recurrence. Equipment and infrastructure were adjusted to avoid future risks.

GRI 416-2: INCIDENTS OF NON-COMPLIANCE CONCERNING IMPACTS ON THE HEALTH AND SAFETY OF PRODUCTS AND SERVICES	2020	2021	2022
Incidents of non-compliance with regulations resulting in a fine or penalty	0	0	0
Incidents of non-compliance with regulations resulting in a warning	0	0	0
Incidents of non-compliance with voluntary codes	4	2	2
Total number of incidents of non-compliance	4	2	2



**08.1** Governance

**08.2** Business ethics and integrity

## 08.1 GOVERNANCE







AMB performs its business in an ethical way, respecting all laws, regulations, and conventions on social and environmental matters.

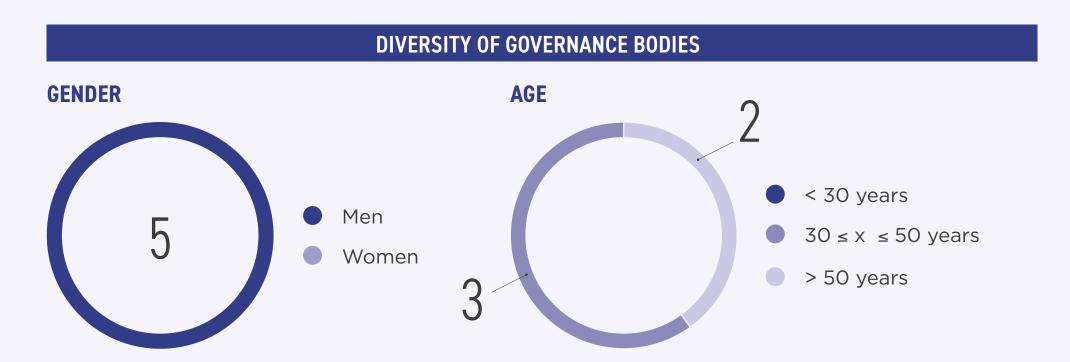
AMB SpA is an Italian legal entity with head office in San Daniele del Friuli (Italy), fully subjected to the management of its sole shareholder Mayfair Holdco SpA. In turn, AMB SpA, controls a British company and a German entity: TDX (Europe) Limited and AMB Deutschland GmbH. Termodinamix is fully controlled by TDX (Europe) Limited.

For additional information and detail on AMB governance, please visit ambpackaging.com/about/

### **BOARD OF DIRECTORS**

The Company management is entrusted with the Board of Directors of AMB SpA, composed of five members and supervised by statutory auditors.

The Company's Board of Directors (BoD) is the key body of the Corporate Governance system.



# 08.2 BUSINESS ETHICS AND INTEGRITY

AMB sets high standards for compliance with existing laws, regulations and conventions on social and environmental matters.

A good business ethics is key to customer retention, talent acquisition and reliable supply chains, and, therefore, to revenue growth. Our entire value chain is guided by a stringent business ethics. This approach is extended to every external entity in order to guarantee that our business won't be negatively impacted by unethical events that could bring to a disruption of our supply change and a reputational damage.

Moreover, AMB carefully monitors the business partners to ensure their business ethics and respect for the regulatory aspects are in line with our expectations. During the vetting process, we examine any instances of non-compliance.

AMB is compliant with the Modern Slavery Act of 2015 to prevent slavery and human trafficking throughout the whole supply chain. We assess our suppliers considering sustainable and ethical aspects in compliance with our values.

AMB complies with any applicable law and enforces professional ethics. We maintain an effective and up-to-date Organisation Management and Control Model to protect the company against any risk of corruption, fraud, money laundering and anticompetitive conduct.

AMB has adopted the **Organisational, Management** and **Control Model according to Legislative Decree 231/01**, approved by the Board of Director on 21/12/2020. It describes the ethic principles and conductd to prevent any potential risk of misbehaviour.

These documents are available to all our employees.

AMB has an anonymous communication channel to report any non-compliant behaviour. The Code of Ethics and the Modern Slavery Policy are available on our website in Italian, English and German.

#### SUSTAINABLE SUPPLY CHAIN

In 2022 we drafted AMB Supply Chain Code of Conducts which includes:

- ▶ Ethics and Social Responsibility
- Labor and Employment Rights
- Environmental Health and Safety
- Review and documentation policy

#### AMB SUPPLY CHAIN CODE OF CONDUCT

The AMB Supply Chain Code of Conduct is aligned with the AMB Code of Conduct, these documents ensure that all our business partners, suppliers, and manufacturers meet our basic expectations of doing business related to legal requirements, ethical practices, human rights, and environmental management.

Our philosophy requires us to only engage with employees, commercial intermediaries, suppliers, and other partners who act in ways consistent with our shared commitment to ethical business practices and compliance with laws. Especially, we expect our suppliers to consider the present Code and share it with their employees.

This supplier code of conduct is created for the purpose of ensuring that AMB's suppliers adhere to high standards of safe working conditions, fair and respectful treatment of employees, and ethical practices.



Specific issues related to business ethics and compliance are overseen by the general management team and discussed regularly in management meetings. This ensures the business is up to date with changes in applicable laws and regulations.

Compliance with environmental standards is managed by a dedicated environment and energy department. They perform periodic audits to assess compliance with regulatory requirements and with the statutory provisions. The Board of Directors is regularly updated on the results of these assessments and is actively involved in defining environmental improvements.

All our initiatives are carried out with the principle of precaution, both environmental and ethicalsocial: investments are examined with the relevant offices to ensure compliance with mandatory regulations. Initiatives are always aimed at improving environmental and worker health and safety standards.

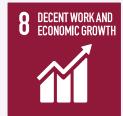
To stay up to date with the regulatory environment of our industry, we subscribe to several portal sites and online publications that report on the latest regulatory requirements. Some specialised issues, such as environmental authorisations, firefighting, and energy, are supervised by external technicians to ensure a higher grade of compliance.

GRI 205-3: Confirmed incidents of corruption and actions taken	2020	2021	2022
Total number of confirmed incidents of corruption	0	0	0
Total number of confirmed incidents in which employees were dismissed or disciplined for corruption	0	0	0
Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption	0	0	0
Public legal cases regarding corruption brought against the organisation or its employees during the reporting period	0	0	0





# 09.1 DATA AND INFORMATION PROTECTION









Innovation and digitalization are the most important drivers of business growth.

AMB seeks innovative solutions to anticipate customers' needs and to improve product quality and performance, sometimes driven by upcoming regulatory and environmental sustainability developments.

AMB has heavily invested in **Cyber security** to update our operating systems and data in response to the rising frequency of cyberattacks against major national and international companies. The ever-increasing sophistication of cyber threats requires constant adjustments of the company's defenses and processes for protecting its IT assets and business know-how. European and national regulatory frameworks require corporate governance to incorporate new security standards.



#### **KEY ACHIEVEMENTS IN 2022**

- Completed datacentre migration to AWS (Amazon Web Services) cloud solution, including new backup policies;
- Review of manufacturing and laboratory electronic systems in order to isolate untrusted environments from the Company's network - initiated 2022; to be completed in 2023
- Phishing campaigns to test users' cybersecurity awareness

- New onboarding cybersecurity training for newcomers
- Information Event Management) solution from Microsoft 365 events collection; to be extended to other systems in 2023
- Completed the last step of the West Monroe Plan: Document Disaster Recovery, Business Continuity, and Incident Response Plan

## am

# O9.2 COLLABORATION WITH UNIVERSITY AND RESEARCH INSTITUTES TO DEVELOP NEW INNOVATIVE PRODUCTS AND PROCESSES



Increase competitiveness, attract young talents, enhance new areas of the business, and support research with AMB industrial experience.

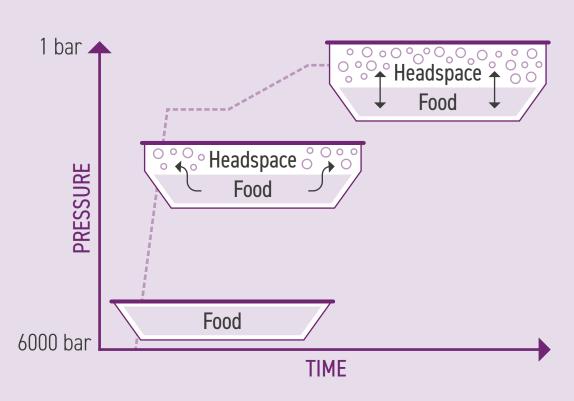
In 2022 we worked with Torino University's Masters Programme in Food Science and Technology to support a student project to find and develop the right recyclable packaging for an important Italian food company.

The challenge was that the packed product would be stabilized through High Pressure Processing (HPP), which involves an extreme treatment that most packaging cannot resist.

HPP allows gentle preservation of food by high pressure without additives or heat, rendering germs and bacteria harmless while at the same time preserving taste and vitamins.

#### WHAT IS AN HPP PROCESS?

Pressure of 6,000 bar – which is roughly equal to the weight of three jumbo jets on an area the size of a smartphone -- is applied to food that is conveyed in special containers into a high-pressure vessel. It then moves into the machine and is filled with water. Pumps raise the pressure in the vessel, which is applied both immediately and evenly, leaving no evident crushing effect on the products. Once finished, the pressure is reduced and your product has a much longer shelf life and maximum product safety.



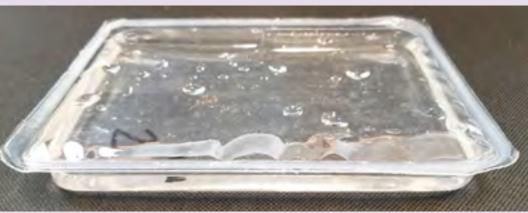
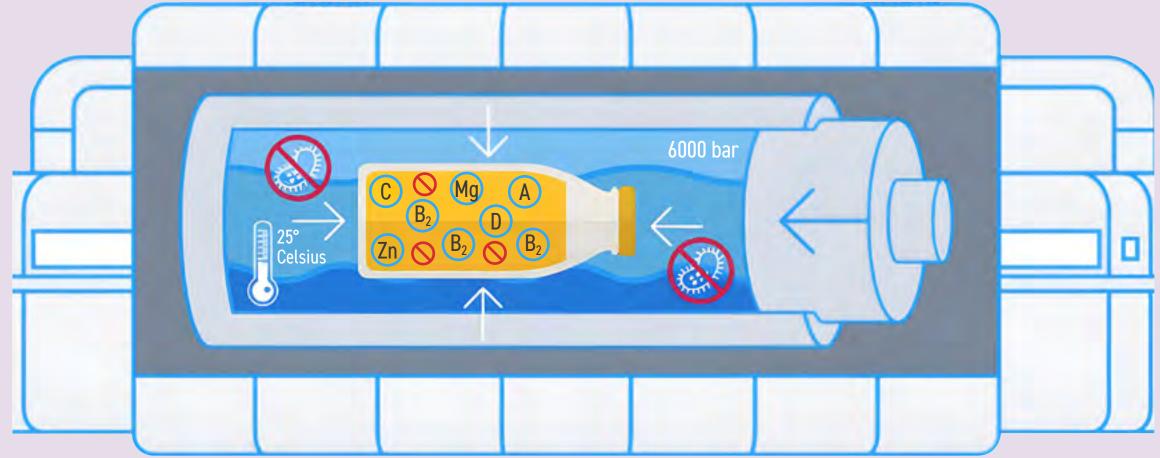


Photo of the packaging after a test in a HPP equipment. The project was successful and after continued testing the best packaging solution was presented to the company.

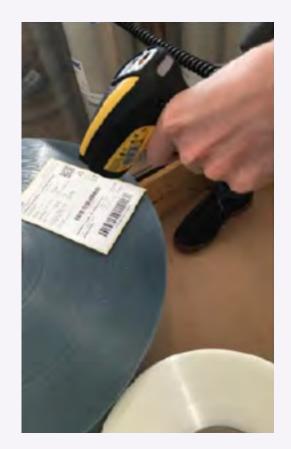


# DIGITAL PRODUCT 09.3 **PASSPORT**











The EU Green Deal includes proposals to empower consumers by **better informing them about the** environmental sustainability of products, and better fighting greenwashing.

Digital product passport is a system for collecting, aggregating and providing data on packaging all along its life cycle and in compliance with EU regulations on eco-design packaging requirements for sustainable products.

To support this sustainable digitalisation, in 2022 AMB became a member of R-Cycle, an association of companies and organisations who promote global standardisation of digital product passports for sustainable plastic packaging based on GS1 standards.





# METHODOLOGICAL NOTES

[GRI 2-1, GRI 2-2, GRI 2-3]

This sustainability report is the second ESG annual report published by AMB SpA. Its aim is to demonstrate AMB's sustainable commitments to our stakeholders, to show accountability for our activities, and to build together a more sustainable future for AMB.

Data and information reported in this report refer to the fiscal years 2020, 2021 and 2022 which are the same as the 01 January – 31 December calendar year.

The reporting perimeter of this document covers AMB's Italian plants and offices (Amaro and San Daniele del Friuli, the headquarters), the German commercial office (Bavaria), the British extrusion division (Gateshead) and British tooling division (Gateshead). Data from the German commercial office (Bavaria) and the British tooling division data has been collected only for the topics "Employment, diversity and skill development", "Occupational health, safety, and well-being", "Product Quality and Safety" and "Business ethics and compliance with the regulatory environment". The German commercial office has also been included in the "Customer satisfaction" topic data.

The Sustainability Report has been drawed up with reference to the GRI Sustainability Reporting Standards published in 2016 by the Global Reporting Initiative (GRI), updated in 2021. The document was drafted in compliance with the principles of accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability. To guarantee the accuracy and reliability of the data, the use of estimates and omissions was avoided as much as possible.

When used, estimates are based on the best available methodologies. Omissions have been tested to verify that their impact is not material.

Estimates and omissions were made for:

#### **GRI 2-7 Employees**

Staff numbers are expressed through the head count approach: this methodology has been applied consistently for the indicators GRI 2-30, 401-1, 404-1, 405-1.

#### **GRI 2-8 Workers who are not employees**

Non-employee worker numbers are expressed through the head count approach: this methodology has been applied consistently to the indicators GRI 2-30, 401-1, 404-1, 405-1.

# GRI 305-1 Direct (Scope 1) GHG emissions, GRI 305-2 Energy indirect (Scope 2) GHG emissions, GRI 305-3 Other indirect (Scope 3) GHG emissions

The data related to year 2022 are calculated following the ISO 14064-1:2018 methodology and its full carbon footprint report is under embargo due to proprietary rights of the consultant which performed the carbon footprint study. For this reason the carbon footprint data are not assured by the external auditors and only total data and general methodological information are disclosed.

# GRI 404-1 Average hours of training per year per employee

In the German office, training hours have been estimated by considering the annual average hours

of training generally provided to each professional category. As a result, 8 hours of product training is considered to be provided to each sales manager and 4 hours of software and accounting training to each office staff member.

#### **GRI 403-9 Work-related injuries**

Injury rates have been calculated through the following formula: number of recordable work-related injuries / number of hours worked X 200,000.

Where no suitable GRI Standards indicators were available for specific topics, Non-GRI indicators were developed:

# Non GRI 1: New innovation projects related to sustainability

The number of new projects related to sustainability started in the reported year is compared to the total number of research and development projects started in the same year. The resulting percentage reflects the company's commitment to developing new sustainable initiatives related to production.

### Non GRI 2: Products designed for recycling

For flexible films, we measure the percentage of products designed for recycling sold in each of the reported years by comparing them to the total products sold in their respective category in the same reported period. In calculating the indicator, we only consider products without polymers, additives, or adhesives, which could disrupt the recycling processes. Data related to the materials are expressed in tonnes; the indicator is only applicable to Italian plants.

# Non GRI 3: Recycled input materials used (raw materials only)

Starting from data and criteria defined by the GRI 301-2 "Recycled input materials used", this indicator calculates the recycled raw materials used in the production process each year as a percentage of the total quantity of plastic material inputs in the same reporting period. The materials are expressed in tonnes.

# Non GRI 4: CO2 emissions avoided by using recycle input materials

The yearly reduction of CO2 that comes from the use of recycled inputs, as opposed to virgin inputs, was calculated in the Carbon Footprint study according to ISO 14064-1:2018.

#### Non GRI 5: On-Time Performance (OTP)

The KPI is measured monthly by comparing the delivery date in the order to the vehicle's date of arrival at the recipient, as indicated by the customer. OTP (%) = (On time orders / Total number of deliveries)  $\times$  100

For additional clarification or further information regarding the content of this document, please contact our Sustainability department at: sustainability@ambpackaging.com.



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# ANNEX: STATEMENT OF ASSURANCE

[GRI 2-5]



**AMB SPA** 

INDEPENDENT AUDITOR'S REPORT ON THE SUSTAINABILITY REPORT

YEAR ENDED 31 DECEMBER 2022





# Independent auditor's report on the Sustainability Report 2022

To the Board of Directors of AMB SpA

We have been engaged to undertake a limited assurance engagement on the Sustainability Report of AMB SpA (hereinafter also the "Company") for the year ended 31 December 2022.

#### Responsibilities of the Directors for the Sustainability Report

The Directors of AMB SpA are responsible for the preparation of the Sustainability Report with reference to the "Global Reporting Initiative Sustainability Reporting Standards" issued in 2016 and updated in 2021 by GRI - Global Reporting Initiative (hereinafter also the "GRI Standards"), as illustrated in the "Methodological Notes" section of the Sustainability Report 2022, identified by the Company as the reporting standard.

The Directors are also responsible for the internal control determined to be necessary to enable the drafting of a Sustainability Report that is free from material misstatements due to fraud or error or non-intentional events and behaviours.

The Directors are also responsible for defining the Company's sustainability performance targets, as well as for identifying its stakeholders and the content of the Sustainability Report.

#### Auditor's Independence and Quality Control

We have complied with the independence and other ethical requirements of the *Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants*, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies the *International Standard on Quality Management 1 (ISQM 1)* and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

## PricewaterhouseCoopers Business Services Srl

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Società soggetta all'attività di direzione e coordinamento della PricewaterbouseCoopers Italia Sri www.pwc.com/it

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#### Auditor's responsibility

Our responsibility is to express a limited assurance conclusion, based on the procedures performed, on whether the Sustainability Report complies with the requirements of the *GRI Standards*. We conducted our work in accordance with criteria established by the *International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements other than Audits or Reviews of Historical Information* (hereinafter also "*ISAE 3000 Revised*") issued by the *International Auditing and Assurance Standards Board* (IAASB) for limited assurance engagements. That standard requires that we plan and perform procedures to obtain limited assurance about whether the sustainability report is free from material misstatement.

The work performed was less in scope than in a reasonable assurance engagement conducted in accordance with ISAE 3000 *Revised* (*reasonable assurance engagement*), and, therefore, do not provide us with a sufficient level of assurance that we have become aware of all significant facts and circumstances that might be identified in a reasonable assurance engagement.

The procedures performed on the Sustainability Report were based on our professional judgement and included inquiries, primarily of personnel of the companies responsible for the preparation of the information presented in the Sustainability Report 2022, as well as inspection of documents, reperforming of calculation and other procedures designed to obtain evidence considered useful.

In detail, we performed the following procedures:

- 1. analysis of the process of definition of the material topics reported on in the Sustainability Report, with reference to the methods of analysis and understanding of the organization's context, identification, assessment and prioritization of actual and potential impacts and to the internal validation of the results of the process;
- 2. understanding of the processes underlying the generation, collection and management of significant qualitative and quantitative information included in the Sustainability Report.
  - In detail, we inquired of and discussed with the management of AMB SpA and we carried out limited analyses of documentary evidence, in order to obtain information about the processes and procedures supporting the collection, aggregation, processing and submission of non-financial information to the corporate function in charge of the preparation of the Sustainability Report.

Furthermore, for significant information, taking into account the activities and characteristics of the Company:

- a) with reference to the qualitative information presented in the Sustainability Report, we carried out interviews and obtained supporting documents to verify its consistency with available evidence;
- b) with reference to quantitative information, we performed both analytical procedures and limited tests to verify, on a sample basis, the accuracy of data aggregation. In addition, we discussed with the persons responsible and obtained documentary evidence, on a sample basis, about the correct application of the procedures and calculation methods applied for the indicators.

#### **Conclusion**

Based on the work performed, nothing has come to our attention that causes us to believe that the AMB SpA Sustainability Report for the year ended 31 December 2022 is not prepared, in all material aspects, with reference to the requirements of the GRI Standards as illustrated in the "Methodological notes" section of the Sustainability Report.



#### Other aspects

With regards to the Carbon Footprint disclosure for the year ended 31 December 2022, described in chapter "05. Developing environmental, sustainable and economic processes –Energy and Emission Efficiency" of the Sustainability Report, as stated in the "Methodological Notes", the carbon footprint qualitative and quantitative disclosure was not in scope of the limited assurance engagement.

Udine, 6 September 2023

PricewaterhouseCoopers Business Services Srl

Paolo Bersani (Partner)

> Firmato digitalmente da: Paolo Bersani Data: 06/09/2023 15:32:49



# ANNEX: EMPLOYMENT, DIVERSITY AND SKILL DEVELOPMENT

[GRI 2-7; GRI 2-8,401-1,405-1]

GRI 2-7 EMPLOYEES		2020			2021			2022		
GRI 2-7 EMPLUTEES	uom	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees	n.	322	61	383	310	63	373	307	68	375
Permanent employees	n.	318	58	376	308	61	369	302	64	366
Temporary employees workers	n.	4	2	7	2	2	4	5	4	9
Non-guaranteed hours employees	n.	0	0	0	0	0	0	0	0	0
Full-time employees	n.	321	45	366	310	51	361	306	58	364
Part-time employees	n.	1	16	17	0	12	12	1	10	11

GRI 2-8 WORKERS WHO ARE NOT EMPLOYEES		2020			2021			2022		
	uom	Men	Women	Total	Men	Women	Total	Men	Women	Total
Workers who are not employees	n.	55	10	65	57	10	67	62	9	71

GRI 401-1 NEW EMPLOYEE HIRES AND	2020		20	021	2022	
EMPLOYEE TURNOVER: NEW HIRES	n	%	n	%	n	%
Total employees at 31.12	383		373		375	
Total New Hires	54	14%	71	19%	78	21%
Men	42	11%	58	16%	61	16%
Women	12	3%	13	3%	17	5%
< 30 years	14	4%	21	6%	21	6%
30 ≤ x ≤ 50 years	35	9%	41	11%	42	11%
> 50 years	5	1%	9	2%	14	4%

GRI 401-1 NEW EMPLOYEE HIRES AND	20	20	20	)21	2022	
EMPLOYEE TURNOVER: TERMINATIONS	n	%	n	%	n	%
Total employees at 31.12	383		373		375	
Total Terminations	55	14%	81	22%	69	18%
Men	44	11%	70	19%	58	15%
Women	10	3%	11	3%	11	3%
< 30 years	15	4%	20	5%	21	6%
30 ≤ x ≤ 50 years	26	7%	46	12%	34	9%
> 50 years	14	4%	15	4%	14	4%



	20	2020		2021		2022	
GRI 405-1 DIVERSITY OF EMPLOYEES	n	%	n	%	n	%	
Total employees	383		373		375		
Men	322	84%	310	83%	307	82%	
Women	61	16%	63	17%	68	18%	
< 30 years	64	17%	63	17%	56	15%	
30 ≤ x ≤ 50 years	232	61%	229	61%	223	59%	
> 50 years	87	23%	81	22%	96	26%	
Managers	28	7%	26	7%	29	8%	
Men	23	82%	22	85%	24	83%	
Women	5	18%	4	15%	5	17%	
< 30 years	0	0%	0	0%	0	0%	
30 ≤ x ≤ 50 years	15	54%	13	50%	16	55%	
> 50 years	13	46%	13	50%	13	45%	

20	20	20	021	2022	
n	%	n	%	n	%
83	22%	84	23%	94	25%
38	46%	38	45%	45	48%
45	54%	46	55%	49	52%
12	14%	11	13%	10	11%
56	67%	59	70%	66	70%
15	18%	14	17%	18	19%
272	71%	263	71%	252	67%
261	96%	250	95%	238	94%
11	4%	13	5%	14	6%
52	19%	52	20%	46	18%
161	59%	157	60%	141	56%
59	22%	54	21%	65	26%
	n 83 38 45 12 56 15 272 261 11 52 161	83       22%         38       46%         45       54%         12       14%         56       67%         15       18%         272       71%         261       96%         11       4%         52       19%         161       59%	n       %       n         83       22%       84         38       46%       38         45       54%       46         12       14%       11         56       67%       59         15       18%       14         272       71%       263         261       96%       250         11       4%       13         52       19%       52         161       59%       157	n         %         n         %           83         22%         84         23%           38         46%         38         45%           45         54%         46         55%           12         14%         11         13%           56         67%         59         70%           15         18%         14         17%           272         71%         263         71%           261         96%         250         95%           11         4%         13         5%           52         19%         52         20%           161         59%         157         60%	n         %         n         %         n           83         22%         84         23%         94           38         46%         38         45%         45           45         54%         46         55%         49           12         14%         11         13%         10           56         67%         59         70%         66           15         18%         14         17%         18           272         71%         263         71%         252           261         96%         250         95%         238           11         4%         13         5%         14           52         19%         52         20%         46           161         59%         157         60%         141

Note: totals may not agree because of rounding



# ANNEX: CAREFUL INTERNAL WASTE MANAGEMENT

[GRI 306-3, 306-4,306-5]

CER (EER) Code	2020	2021	2022*
Total of NON-DANGEROUS WASTE	4,002.85	4,084.47	3,281.98
CER 070212	0.50	2.91	0.47
CER 070213	1,395.47	1,417.47	1,070.26
CER 070213	950.00	1,044.92	0.00
CER 080410	0.34	0.07	0.00
CER 080416	23.01	30.76	47.14
CER 120103	39.00	75.00	0.00
CER 120105	1.14	1.81	0.40
CER 150101	99.40	85.13	69.56
CER 150102	6.70	0.00	5.70
CER 150103	188.88	215.56	272.24
CER 150106	80.88	87.06	94.86
CER 160214	2.86	0.46	0.39
CER 160117	1.00	2.00	0.00
CER 160216	0.36	0.07	0.00
CER 170202	0.29	0.00	0.05
CER 170405	35.38	6.09	4.46
CER 170411	0.57	0.11	0.12
CER 170604	0.00	0.00	0.13
CER 200101	2.82	0.00	0.00
CER 200304	2.31	1.01	0.00
CER 080313	24.09	0.00	12.20

CER (EER) Code	2020	2021	2022*
CER 080313	162.33	246.22	177.23
CER 150203	3.12	2.48	0.60
CER 161002	370.95	496.97	322.86
CER 200301	611.45	368.38	0.00
CER 200301	0.00	0.00	322.40
CER 200301	0.00	0.00	557.82
CER 191204	0.00	0.00	323.09
Total of DANGEROUS WASTE	170.01	63.95	69.88
CER 080111*	0.05	0.00	0.00
CER 080119*	1.56	0.00	0.00
CER 080119*	6.41	0.00	0.00
CER 080312*	16.62	0.00	0.00
CER 080312*	78.53	2.17	22.78
CER 080409*	8.34	1.58	0.00
CER 120109	11.00	10.00	0.00
CER 130205*	2.52	2.14	0.45
CER 140603*	1.00	7.69	3.07
CER 140603*	0.00	0.00	5.31

CER (EER) Code	2020	2021	2022*
CER 150110*	14.75	13.58	8.89
CER 150111*	0.28	0.19	0.09
CER 150202*	21.31	18.62	26.19
CER 150203*	0.00	0.00	0.07
CER 160121*	1.57	0.83	2.69
CER 160211*	0.14	0.00	0.00
CER 160213*	0.11	0.00	0.00
CER 160215*	0.06	0.00	0.00
CER 160303*	0.07	0.00	0.00
CER 160305*	0.29	0.00	0.00
CER 160601*	0.23	0.00	0.00
CER 160708*	0.22	0.00	0.00
CER 161001*	4.87	6.76	0.00
CER 170604*	0.09	0.33	0.00
CER 200121*	0.00	0.06	0.29
CER 160216*	0.00	0.00	0.053
Total waste generated	4.172,86	4.148,42	3.351,86

<sup>\*</sup> For the year 2022, the data refers to the IT and UK divisions



CER (EER) Code NON-DANGEROUS WASTE	Disposal / Recovery Operation
CER 070212	Diverted From Disposal - Other Recovery Op Offsite
CER 070213	Diverted From Disposal - Other Recovery Op Offsite
CER 080410	Diverted From Disposal - Other Recovery Op Offsite
CER 080416	Directed to Disposal - Other Disposal Op Offsite
CER 120105	Diverted From Disposal - Other Recovery Op Offsite
CER 150101	Diverted From Disposal - Other Recovery Op Offsite
CER 150102	Diverted From Disposal - Other Recovery Op Offsite
CER 150102	Diverted From Disposal - Recycled - Offsite
CER 150103	Diverted From Disposal - Other Recovery Op Offsite
CER 150106	Diverted From Disposal - Other Recovery Op Offsite
CER 150106	Diverted From Disposal - Recycled - Offsite
CER 160214	Diverted From Disposal - Other Recovery Op Offsite
CER 160216	Diverted From Disposal - Other Recovery Op Offsite
CER 170202	Diverted From Disposal - Other Recovery Op Offsite
CER 170405	Diverted From Disposal - Other Recovery Op Offsite
CER 170411	Diverted From Disposal - Other Recovery Op Offsite
CER 170604	Diverted From Disposal - Other Recovery Op Offsite
CER 200101	Diverted From Disposal - Other Recovery Op Offsite
CER 200301	Diverted From Disposal - Other Recovery Op Offsite
CER 200301	Diverted From Disposal - Other Recovery Op Recycled - Offsite
CER 200304	Directed to Disposal - Other Disposal Op Offsite
CER 080313	Diverted From Disposal - Other Recovery Op Offsite
CER 080313	Directed to Disposal - Other Disposal Op Offsite
CER 150203	Diverted From Disposal - Other Recovery Op Offsite
CER 161002	Directed to Disposal - Other Disposal Op Offsite
CER 191204	Diverted From Disposal - Recycled - Offsite

CER (EER) Code DANGEROUS WASTE	Disposal / Recovery Operation
CER 080111*	Diverted From Disposal - Other Recovery Op Offsite
CER 080119*	Diverted From Disposal - Other Recovery Op Offsite
CER 080119*	Directed to Disposal - Other Disposal Op Offsite
CER 080312*	Diverted From Disposal - Other Recovery Op Offsite
CER 080312*	Directed to Disposal - Other Disposal Op Offsite
CER 080409*	Diverted From Disposal - Other Recovery Op Offsite
CER 130205*	Diverted From Disposal - Other Recovery Op Offsite
CER 140603*	Directed to Disposal - Other Disposal Op Offsite
CER 150110*	Diverted From Disposal - Other Recovery Op Offsite
CER 150111*	Diverted From Disposal - Other Recovery Op Offsite
CER 150202*	Diverted From Disposal - Other Recovery Op Offsite
CER 160121*	Diverted From Disposal - Other Recovery Op Offsite
CER 160211*	Diverted From Disposal - Other Recovery Op Offsite
CER 160213*	Diverted From Disposal - Other Recovery Op Offsite
CER 160215*	Diverted From Disposal - Other Recovery Op Offsite
CER 160303*	Diverted From Disposal - Other Recovery Op Offsite
CER 160305*	Diverted From Disposal - Other Recovery Op Offsite
CER 160601*	Diverted From Disposal - Other Recovery Op Offsite
CER 160708*	Directed to Disposal - Other Disposal Op Offsite
CER 161001*	Directed to Disposal - Other Disposal Op Offsite
CER 170604*	Diverted From Disposal - Other Recovery Op Offsite
CER 200121*	Diverted From Disposal - Other Recovery Op Offsite
CER 160216*	Diverted From Disposal - Other Recovery Op Offsite





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