

# Sustainability Report 2022

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# Foreword by the CEO.

Dear Reader,

We understand that you care about sustainability. So do we. That's why I am very pleased to welcome you to Landbell Group's first sustainability report.

Looking at better, more sustainable ways to deliver our services and solutions, we are committed to progressing to the next level with our sustainability initiative, which we launched in the summer of 2022.

With increasing interest from employees, customers, consumers, regulators and other stakeholders, companies are more and more expected to assess their performance and impacts on various sustainability topics.

We already have programmes and internal procedures in place to ensure the compliance of our services and organisation, but we are striving to improve what makes us a transparent partner for our customers, a responsible employer and a sustainability leader in our communities and environment.

Reliable and insightful information is our aim, so our sustainability initiative follows the international [Global Reporting Initiative \(GRI\) Standards](#). This report, therefore, provides you with the high level of quality you need to trust our corporate claims.

Let me first provide you with some more background on who we are and what we do.

Established as a packaging compliance scheme in Germany in 1995, the Group has since evolved into a global service provider. Today, we help over 40,000 customers from more than 60 countries to fulfil their extended producer responsibilities for environmental and chemical compliance.

In 2022 alone, we arranged end-of-life collection and processing for more than a million tonnes of waste batteries, electronics and packaging.

At Landbell Group, we know that a healthy environment is the basis of life for the generations to come. We also know that an innovative and competitive circular economy is vital for sustainable growth. We want to do our share to make the circular economy work.

Material loops must be closed effectively. We strongly believe that the concept of extended producer responsibility (EPR), which is at the heart of our business, is vital to the circular economy.

In the next few years alone, the EU will introduce [many new circular economy regulations for producers](#). The European Union has made EPR a key part of its Circular

Economy Action Plan and other countries around the globe are increasingly implementing EPR-based policies.

With our first sustainability report, we want to demonstrate that sustainability is deeply rooted in our core business and firmly embedded in our values.

Our sustainability report covers the fiscal year 2022. In the future, we will publish a sustainability report annually. No external audit is planned for the time being.

To demonstrate our commitment, in May 2023, we also joined the [United Nations Global Compact](#) and officially committed to the [Ten Principles of the UN Global Compact](#) on human rights, labour, environment and anti-corruption. This year, we received the [Ecovadis](#) Silver medal. Please see pages 8 and 9 for more information.

We will proceed from here and give our commitment even more weight and visibility in the future.

Now, I would also like to ask for your support. It takes all of us working together to drive sustainable development. Please join us on this crucial journey.

**Jan Patrick Schulz**  
CEO of Landbell Group

# Our Group.

Landbell Group is an international supplier of service and consulting solutions for environmental and chemical compliance.

We reduce the complexity of extended producer responsibility (EPR) legislation, as well as other product- and packaging-related requirements for producers and distributors. In everything we do, we seek to provide our customers with the most optimal solutions in terms of service quality, compliance and cost.

At Landbell Group, we prepare our clients for the uncertainties to come. We help them unlock the value of the circular economy and strive to be their best partner on the journey to a more sustainable future.

Our customers are companies that put a variety of products on the market, ranging from packaging made of metals, plastics, paper, cardboard or glass, to batteries and electrical and electronic equipment (EEE).

We support our customers with the declaration of quantities that they put on the market, the tracking of their regulatory obligations, as well as the organisation of the legally compliant treatment of their products once they have reached their end-of-life.

For physical collection and treatment, we work with our international network of waste management industry suppliers. With our well-established and controlled supply chain, we have the expertise to support customers wherever they need us and expand the global waste infrastructure.

Consumers play an essential role in improving collection and recycling rates.

This is why, in certain countries, we run consumer awareness campaigns to promote proper waste separation.

We also work with scientific institutions and universities to exchange knowledge and ideas on circularity. In developing countries we support government agencies and municipalities as a commercial contractor to develop and implement local EPR systems.

Additionally, we offer advisory services for producers of pharmaceuticals, cosmetics and other chemical products to manage chemical compliance globally and assure market access.

Working at the intersection of all these stakeholders' interests gives us deep insights into the current state and future possibilities of circular material flows, wherever they are on the planet.

For a better understanding of what EPR is and does, please see the next page.



## Extended producer responsibility (EPR) in a nutshell

The [Organisation for Economic Co-operation and Development \(OECD\)](#) defines EPR as an environmental policy approach in which a producer's responsibility for a product is extended to the post-consumer stage of a product's lifecycle.

The concept of EPR was first devised for Germany's packaging industry in the early 1990s. It is an approach based on the '[polluter-pays principle](#)', according to which the party putting products or packaging onto a market for the first time remains responsible for them until the end of their lifecycle.

In practical terms, this means the producers need to organise and/or finance the collection, recycling and final disposal of the items at the end of their life. The aim was and still is to shift the costs for the collection, recycling or disposal of these major waste streams away from municipalities and back to producers. This provides an incentive for producers to reduce the overall amount of waste that they produce and switch to more easily recyclable products through product design.

The European Union (EU) has been a frontrunner in introducing EPR, having implemented [strict legal frameworks](#) for packaging, waste electrical and electronic equipment (WEEE) and batteries. Meanwhile,

EPR is being implemented by many countries across the globe. Many producers have also introduced additional voluntary takeback programmes within their environmental policies as a way of taking more responsibility.

In the EU and many other countries, EPR systems are mandatory, particularly for packaging, WEEE and batteries. There are several options for the participants to fulfil their related obligations. The most common setup is to contract with a specialised organisation called a [producer responsibility organisation \(PRO\)](#). In some countries, it is even obligatory to contract with a PRO.

How exactly a PRO is set up differs from country to country, but often it works like this:

Typically, the company putting products or packaging onto a market where EPR legislation is in place needs to register on a national register. Volumes of products or packaging put onto the market need to be reported in defined categories (by unit or by material type) which is then used to calculate the financial or operational obligation for this company.

The company then contracts a PRO to manage this obligation on its behalf. The PRO organises the collection and recycling of the related volumes on behalf of the

company to meet targets set under the EPR legislation. These could be collection and recycling targets based on the volumes of new products and packaging put onto the market over a defined period.

Landbell Group runs 40 PROs in 17 countries for packaging, WEEE and batteries. On behalf of producers, we take care of their obligations once the final users, including consumers, discard their products.

Our PROs hold contracts with many collection points, such as municipalities, retailers and household waste collectors. We make sure that our partners collect the waste attributed to our customers and then organise the transport of the waste to sorting and treatment facilities.

These facilities are also our contracted partners who run their operations according to legal requirements. The entire process is documented, and the related certificates are generated, to allow us to demonstrate compliance to the authorities and/or our customers.

In a nutshell, our PROs coordinate the whole network to assure legally sound takeback and treatment of end-of-life products and packaging on behalf of our clients.

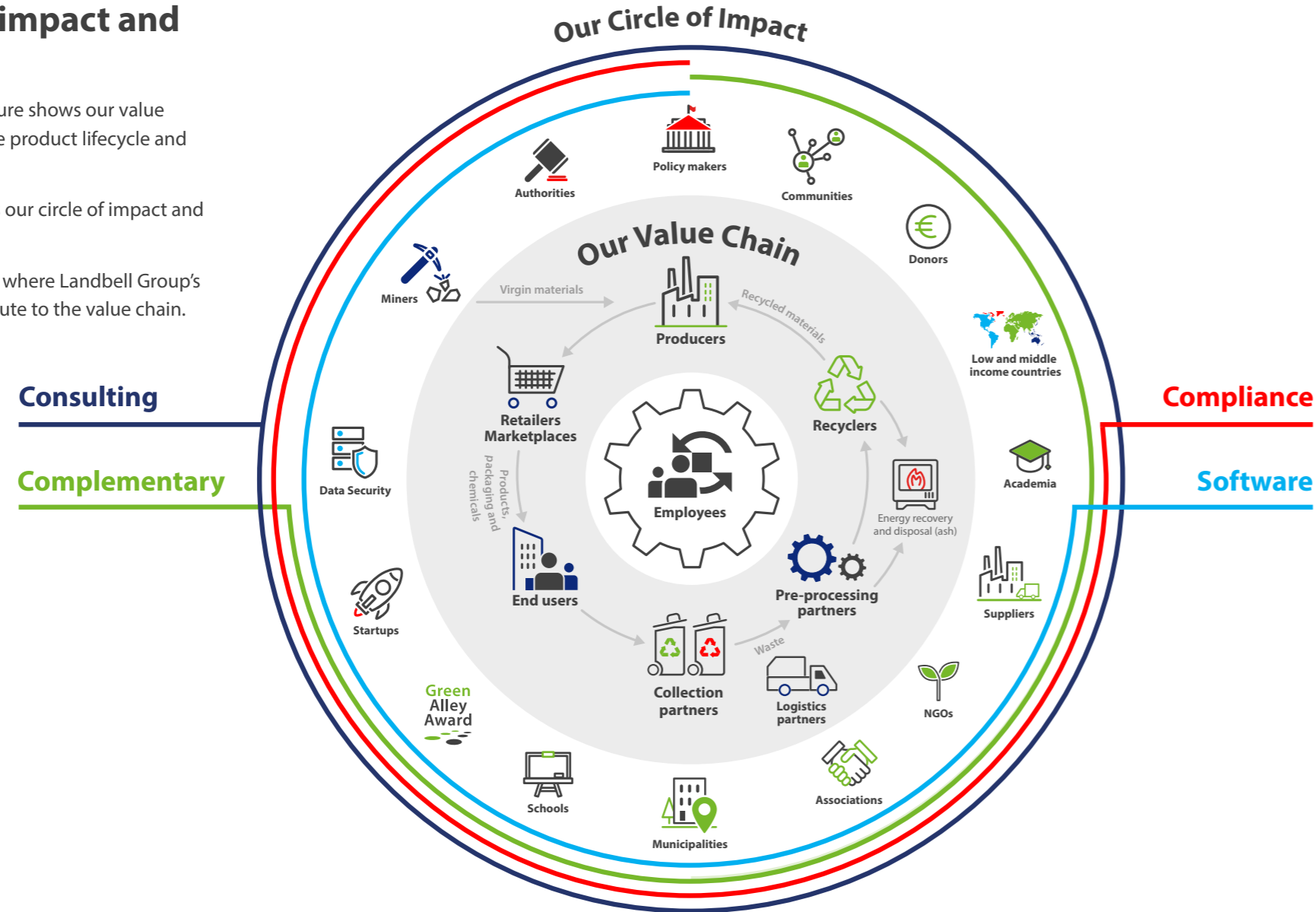
All our customers have to do is tell us what they put on the market and how much – we take care of the rest.

## Our circle of impact and value chain

The inner part of this figure shows our value chain that runs along the product lifecycle and material flows.

The outer part illustrates our circle of impact and our key stakeholders.

The coloured lines show where Landbell Group's four key services contribute to the value chain.



## Business overview

Landbell Group operates in four areas: compliance, consulting, complementary services and software. Our main customers are global businesses that place packaging, batteries or electrical and electronic equipment (EEE) on the market.

Increasingly, we serve online retailers, including marketplaces. As part of our consulting services, we also advise producers as well as policymakers and their consultants across the globe. Landbell Group has grown considerably in recent years. Headquartered in Mainz, Germany, Landbell Aktiengesellschaft für Rückhol-Systeme (Landbell AG) acts as its holding company. The Group is privately owned and our units are mostly structured as limited liability companies (a GmbH company in German).

Our European Recycling Platform (ERP) subgroup is composed of subsidiaries and offices which operate producer responsibility organisations (PROs) across and outside of Europe.

The H2 Compliance subgroup in Europe and North America mostly provides environmental services and consulting, and compliance services for the registration and authorisation of chemicals.

Landbell Consulting tracks regulatory EPR development across the globe as a service for producers and globally delivers EPR projects for governmental organisations.

## Compliance

### Multinational WEEE, batteries & packaging compliance

The Group provides 40 PRO services for waste electrical and electronic equipment (WEEE), batteries and packaging in 17 countries, helping over 40,000 customers in more than 60 countries to fulfil their extended producer responsibility (EPR) obligations.

In 2022 alone, we arranged for the collection and treatment of more than a million tonnes of packaging waste, WEEE and waste batteries.

Since 2004, we have collected and treated over 7 million tonnes of packaging waste, 4 million tonnes of WEEE, and 117,000 tonnes of waste batteries.



## Consulting

### Global consultancy for environmental and chemical compliance

Our broad international experience has led us to offer consulting services.

Since 2016, we have advised customers on how to meet environmental and chemical obligations in new markets or when legal requirements change. Our consulting services encompass waste legislation, EPR compliance, and chemical regulatory compliance, for example, the Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH) and Restriction of Hazardous Substances (RoHS).

We also monitor and provide advocacy on policy developments.

Since the beginning of our operations, we have been in close contact with policymakers at EU and national levels to share our practical experience handling multiple waste streams in multiple countries.

Since 2019, we have also supported governments and municipalities around the globe, mainly in low- and middle-income countries, with the implementation of effective EPR policies and alternative solutions for setting up proper waste management.



## Complementary services

### Disposal of site waste and transport packaging

Our complementary services combine our compliance and consulting expertise to strengthen our portfolio.

We support customers with their waste management challenges, such as the treatment of production waste and the coordination of global voluntary individual takeback programmes.

Most recently, we have begun to expand our activities into trading and supplying secondary raw materials. This is an important strategic step for us: we want to retrieve the secondary raw materials recovered from our customers' waste and return them to them.

Our goal is to make secondary raw materials available to producers in a closed-loop process.

DS Entsorgung, based in Germany but active across Europe, delivers takeback services for many waste streams, including industrial waste disposal and solutions for the chemical and pharmaceutical industries. Since 2022, it has expanded its activities to the supply of secondary raw materials.



## Software

### Digital solutions for the circular economy

Digitalised processes are the backbone of our business.

Takeback, EPR compliance and chemicals management are heavy on administrative processes and subject to increasingly demanding regulatory requirements. We are setting a software systems standard that helps us and our customers to effectively manage the complexity.

Landbell Software, based in Portugal, produces Circul8®, an industry-standard solution for takeback transaction and PRO management.



## Ecovadis silver

We have been awarded a silver medal in recognition of our efforts by Ecovadis.

We are proud of this achievement, which showcases our dedication to sustainability. This recognition underscores our commitment to environmentally conscious practices and responsible corporate behaviour.

While the silver medal validates our efforts, we are committed to continuous improvement. Moving forward, we aspire to elevate our performance by focusing on key areas outlined in the Ecovadis assessment. Specifically, we aim to bolster our sustainable procurement and intensify our carbon reduction initiatives.

As we continue this journey, we remain steadfast in our pursuit of excellence in sustainability, setting a benchmark for others to follow.



## Landbell Group is proud to support:



### Answering the United Nations' call

This year, Landbell Group joined the United Nations Global Compact.

The UN Global Compact is a voluntary leadership platform for the development, implementation and disclosure of responsible business practices.

The Group is proud to join thousands of other companies globally committed to taking responsible business action to create the world we all want.

The Global Compact is a call to companies everywhere to align their operations and strategies with 10 universally accepted principles in the areas of human rights, labour, environment and anti-corruption, and to take action in support of UN goals and issues embodied in the Sustainable Development Goals (SDGs).



### Coalition to end plastic pollution

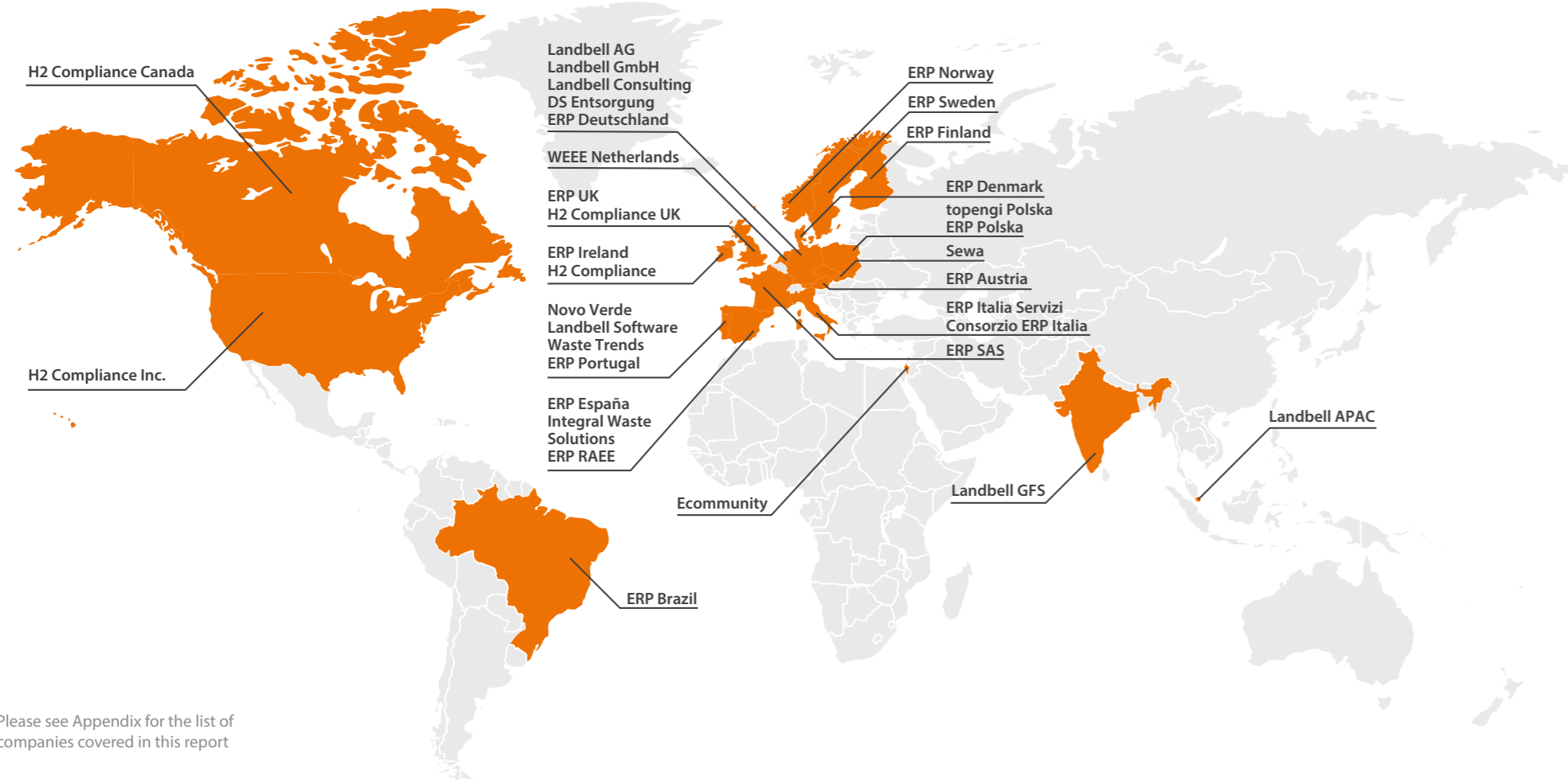
In 2023, we endorsed the [Business Coalition for a Global Plastics Treaty](#) convened by the [Ellen MacArthur Foundation](#) and [World Wildlife Fund](#).

The coalition brings together businesses across the plastics value chain and financial institutions committed to supporting the development of an ambitious, effective and legally binding [UN treaty to end plastic pollution](#).

By joining forces with other like-minded businesses, Landbell Group aims to drive sustainable change, promote circular economy solutions, and advocate for the adoption of a comprehensive global treaty to address the plastic waste crisis and create a cleaner, healthier planet for future generations.



## Landbell Group companies around the world



Please see Appendix for the list of companies covered in this report

## Performance & markets

In 2022, Landbell Group generated sales of €355 million. The total economic value retained was €17 million, with total value distributed equally to approximately 93 percent of sales.

The Group has the target of generating total revenue of €360 million in 2023 with a sustained annual growth rate of around 10 percent over the next few years.

The entities covered within the scope of this report are responsible for 97 percent of the total revenue.

Germany is our main market, followed by the UK, Italy and Portugal. From our strong European base, we increasingly operate in the Americas and Asia.

As a rule, we follow our customers to their international markets to organise their extended producer responsibility (EPR) obligations and support them with their voluntary return programmes or need for knowledge on locally applicable regulations.

In 2022, we continued to expand into Brazil, India and Canada.

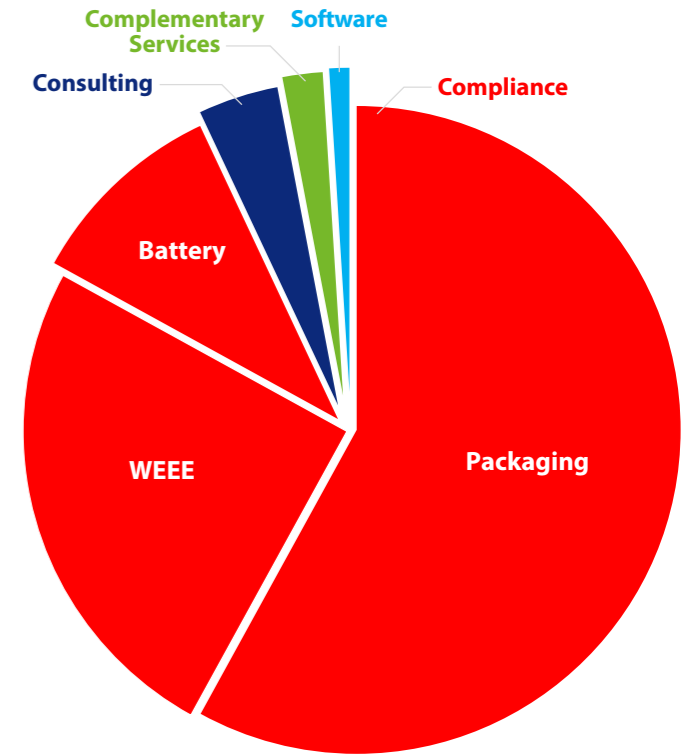
Historically, packaging has been the primary waste stream for our EPR business, followed by waste electrical and electronic equipment (WEEE) and batteries.

As reflected in the sales split by business category, our consulting and software activities are of relatively smaller size. Nevertheless, consulting and software services are of increasing importance because they add value to our EPR-related activities.

These services help our customers to navigate their regulatory compliance requirements and manage their EPR-related obligations globally. Moving forward, we foresee a gradual expansion of both activities.

## Sales split by business activity

<b>Compliance</b>	<b>93%</b>
Packaging	58%
WEEE	25%
Battery	10%
<b>Consulting</b>	<b>4%</b>
<b>Software</b>	<b>1%</b>
<b>Complementary Services</b>	<b>2%</b>



## Organisational structure & governance bodies

Landbell Group's governance body is its Global Leadership Team (GLT). Its decisions are implemented throughout the organisation via corporate bodies and along intragroup reporting lines.

The GLT is chaired by the Chief Executive Officer (CEO) of the Group. The CEO is a senior executive in Landbell AG, which produces about 40 percent of the turnover and serves as the holding company of the Group. Conflicts of interest do not arise between the interests of Landbell AG and Landbell Group.

The GLT does not have committees. Therefore, the entire GLT presides over the management of the organisation and its impacts. The GLT meets in person regularly. Additionally, personal interaction occurs at other group meetings or bilaterally. In 2022, the GLT held every second meeting at a group entity to enable engagement with local management and staff.

All GLT members are executives in the organisation and hold corporate positions, usually as managing directors or board members of various Group entities. They abide by the corporate policies on conflicts of interest. Being hired, and not appointed by external organisations, their independence has never been called into question.

## Landbell Group's Global Leadership Team

<p><b>Chief Executive Officer (CEO) of Landbell Group</b> <i>German</i> Chairman of the Executive Board of Landbell AG in Germany</p>	<p><b>Chief Financial Officer (CFO) of Landbell Group</b> <i>German</i> A member of the Executive Board of Landbell AG in Germany</p>	<p><b>Chief Operating Officer (COO) for the Germany, Austria &amp; Switzerland region</b> <i>German</i> A member of the Executive Board of Landbell AG in Germany</p>
<p><b>COO for Europe &amp; North America</b> <i>Irish</i> General Director of European Recycling Platform (ERP) SAS in France, the sub-holding for ERP subgroup, as well as Director of HH Compliance Ltd, the holding company of H2 Compliance subgroup.</p>	<p><b>COO for Africa, Asia &amp; Latin America</b> <i>French</i></p>	<p><b>CFO of ERP Subgroup</b> <i>Italian</i></p>
<p><b>Chief Commercial Officer (CCO)</b> <i>Irish</i></p>	<p><b>Chief Procurement Officer (CPO)</b> <i>German</i></p>	<p><b>Chief Information Officer (CIO)</b> <i>German</i></p>

So far, evaluation of the GLT's performance has mainly covered economic and employee-related topics. As we begin our corporate sustainability journey, we are mindful of the gaps related to other sustainability aspects and the management of related impacts in our evaluation process. We strive to gradually address these gaps as we advance in our sustainability initiative in the coming years.

### Competencies

The GLT represents 100 percent of the geographies and businesses in which we are active and therefore has the necessary business and regional competencies.

### Appointment to the GLT results from:



1. A major acquisition, in which case the top member of the governing body of the acquired company may be requested to take a seat on the GLT



2. A replacement of a GLT member, retiring or leaving the company



3. A geographical scope extension, in which case the new geography may be directly represented in the GLT



4. An appointment from a central key function, whose know-how and experience may help steer the organisation

There is no direct representation of stakeholders in the GLT. However, several members of the GLT represent key departments, including finance, sales, procurement and regional experts. This allows the GLT to assess the company's impacts that fall under their remit and to communicate them with the respective stakeholders.

The sustainability office (for more information, please see page 17) reports directly to the CEO, while the compliance programme and human resources come under the responsibility of the CFO.

The sustainability office focuses particularly on impacts, improvement potentials and shares its knowledge with the GLT.

### Nomination and selection

The Executive Board of Landbell AG, namely the CEO, CFO and COO of the Germany, Austria and Switzerland region, were appointed by the shareholders. The nomination of other GLT members has evolved as the business has expanded.

So far, the GLT members have been nominated for their skills, as well as the strategic representation of key departments, such as sales.

Members of the GLT are nominated by the CEO, after consultation with the current members of the GLT.

## Sustainability strategy

Our business model puts us in a crucial position to close product lifecycles. Our services help to enhance material circularity and resource efficiency. As part of our sustainability initiative, we are bringing our contribution to the next level by aligning our corporate practices with the demands of sustainable development and of the related stakeholders.

To this end, we have initiated a process to identify Landbell Group's material sustainability issues with the help of external consultants. We are using the standards provided by the Global Reporting Initiative (GRI). The process started with a briefing to a core team of senior executives and managers on sustainability reporting and the GRI standards.

A materiality workshop followed, in which an extended team of GLT members and departmental representatives participated. The outcome of this workshop was the identification of our key stakeholders and key topics along the value chain of the Group.

Our comprehensive assessment of sustainability issues initially identified 16 topics. A follow-up workshop was then organised to further refine the topics, according to

the significance of their impacts. Through this process, we defined seven material topics as the key priorities for our Group:

- GRI 301: Materials
- GRI 302: Energy
- GRI 305: Emissions
- GRI 306: Waste
- GRI 308: Supplier environmental assessment
- GRI 404: Training and education
- GRI 414: Supplier social assessment

We supplemented these topics with those that are relevant to our key stakeholder groups. For this purpose, we reached out to key stakeholders internally and externally to collect their input. We expect to make the process more comprehensive as we evaluate and improve our efforts in the following years.

Building on the identified material topics and input from our key stakeholders, we drafted our first Group sustainability strategy (see diagram on page 16).

For some topics, we have already defined strategy approaches and metrics. For others, this will take place in the course of 2023.

Our key stakeholders were involved in the process of defining our sustainability approach through different channels (please see the diagram on the next page for more information):

### Our key stakeholders

**Employees:** We believe our services are of high quality only because we have a motivated and competent workforce

**Customers:** We understand our customers' expectations and are committed to helping them in their own sustainability journeys

**Suppliers:** We consider supply chain sustainability holistically – to ensure fair and ethical business practices

**Authorities:** Extended producer responsibility (EPR) is one of our core services, for which we work with local, as well as national authorities globally

**Policymakers:** We are proactively contributing to policy development at national and EU levels

## Materiality assessment

**Participants:** The sustainability office, representatives of key departments and group activities, and most members of the GLT

**Goal:** Identification of the most important stakeholders and sustainability topics for Landbell Group

## Employee engagement survey

**Participants:** All employees of Landbell Group

**Goal:** Identification of key sustainability topics and impacts from employees' perspective

## Input from managers

**Participants:** GLT members and managers of all entities and heads of department

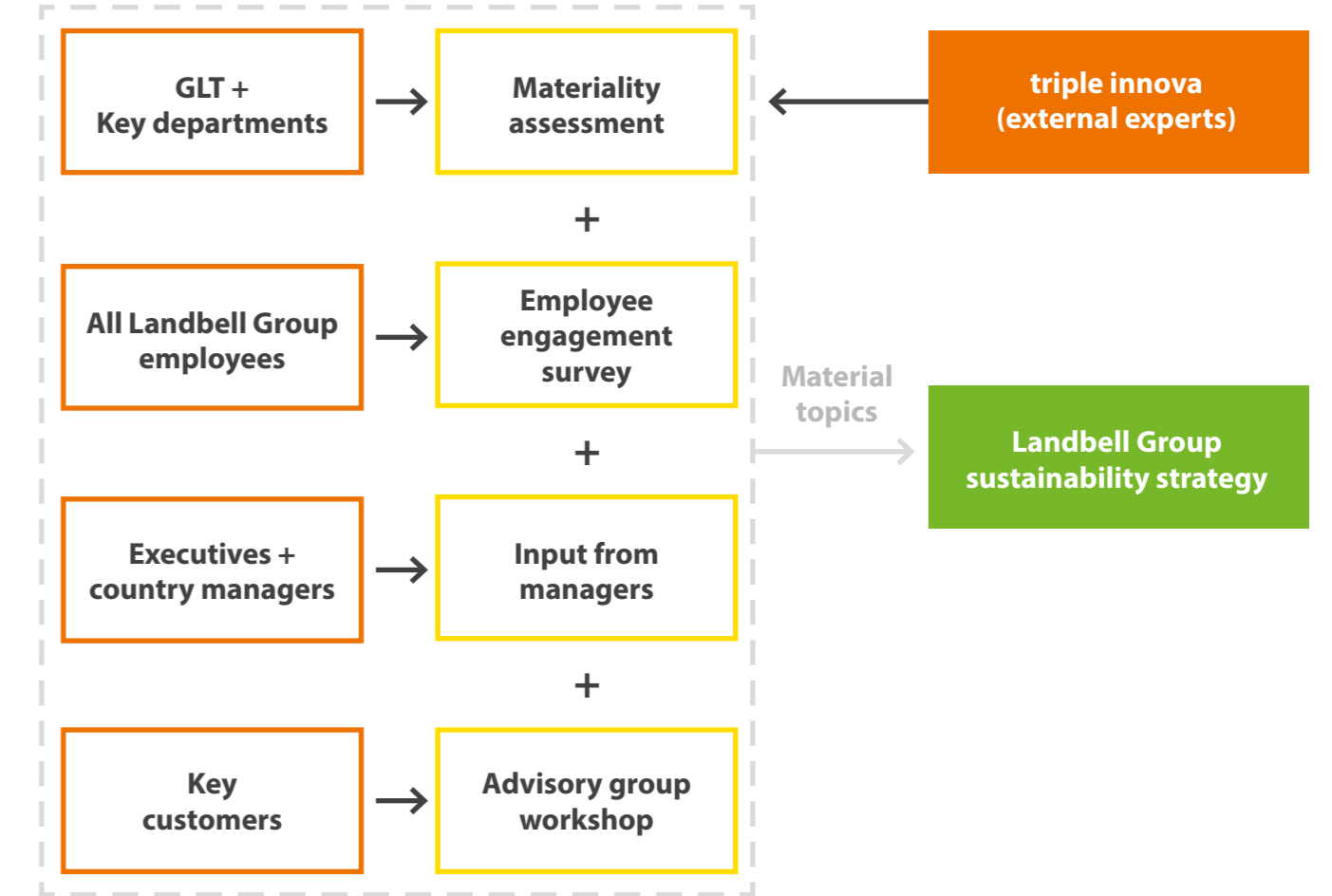
**Goal:** Identification of the most important impacts and climate action priorities

## Advisory group workshop

**Participants:** Select customers

**Goal:** Identification of sustainability topics important to customers

## Stakeholder engagement process for defining our sustainability strategy





## Landbell Group sustainability strategy

### Environmental



#### Climate action

Take inventory of our carbon emissions, set reduction targets, and implement measures to meet these targets



#### Circular economy

Help enable product circularity through innovation in collaboration with value chain stakeholders



#### Waste and pollution

Facilitate material flow transparency to ensure compliant waste management and zero pollution

### Social



#### Human capital

Prioritise employee wellbeing and engagement while ensuring equal opportunities



#### Community engagement

Support social actors (grassroots, startups, academia, authorities, policymakers) with sustainability initiatives



#### Value chain collaboration

Play a central role in the end-of-life value chain to enable a more circular economy

### Governance



#### Business ethics

Ensure the highest standards for business operation across the company



#### Supply chain performance

Set expectations and monitor suppliers' performance in line with our own business ethics and standards



#### Stakeholder engagement

Allow open dialogue and partnership with stakeholders for continual progress towards our sustainability goals

## Sustainability organisation

We have established a sustainability office with a dedicated team to centrally manage sustainability activities across Landbell Group.

The sustainability office plays a central role in managing all sustainability-related issues. As the coordination unit, the office facilitates exchanges across entities, departments and the leadership team. Accordingly, it also takes part in and supports any sustainability-related initiative across the Group, with responsibility for:

### Impacts identification

Analyses processes, activities and products to determine potential sustainability impacts and prioritise improvement areas.

### Strategies and goals

Works with the Global Leadership Team (GLT) members, as well as department managers, to align business strategies with the broader sustainability objectives of the Group, and to set out goals for improvement.

### Monitoring and reporting

Collects data, insights and updates on the Group's performance using the central monitoring system and reports it to the GLT and other internal stakeholders. If needed, some data and insights may be communicated

with external stakeholders (including expert consultants and customers).

### Communicating progress

Organises timely and regular communication of progress in the form of a Group-level sustainability report, as well as other appropriate formats.

With support from the sustainability office, department managers will be responsible for:

### Stakeholder engagement

Fostering effective communications channels, seeking stakeholder input and feedback, and considering stakeholder perspectives in decision-making processes.

### Sustainability performance

Collecting and sharing relevant data, tracking progress towards targets, and regularly reporting on local sustainability performance. This information shall be shared with the sustainability office and other designated reporting channels.

Need-based working groups may be formed for topic-specific improvement programmes in coordination with the sustainability office and department managers, which include country managers of our national entities.

The GLT will have ultimate ownership of sustainability performance across all entities of the Group. Sustainability strategy topics are each owned by GLT members who will support the office and managers with the identification and management of the topic-related impacts.

Any concerns regarding the Group's sustainability performance can be raised safely through an internal channel for whistleblowing and reporting.

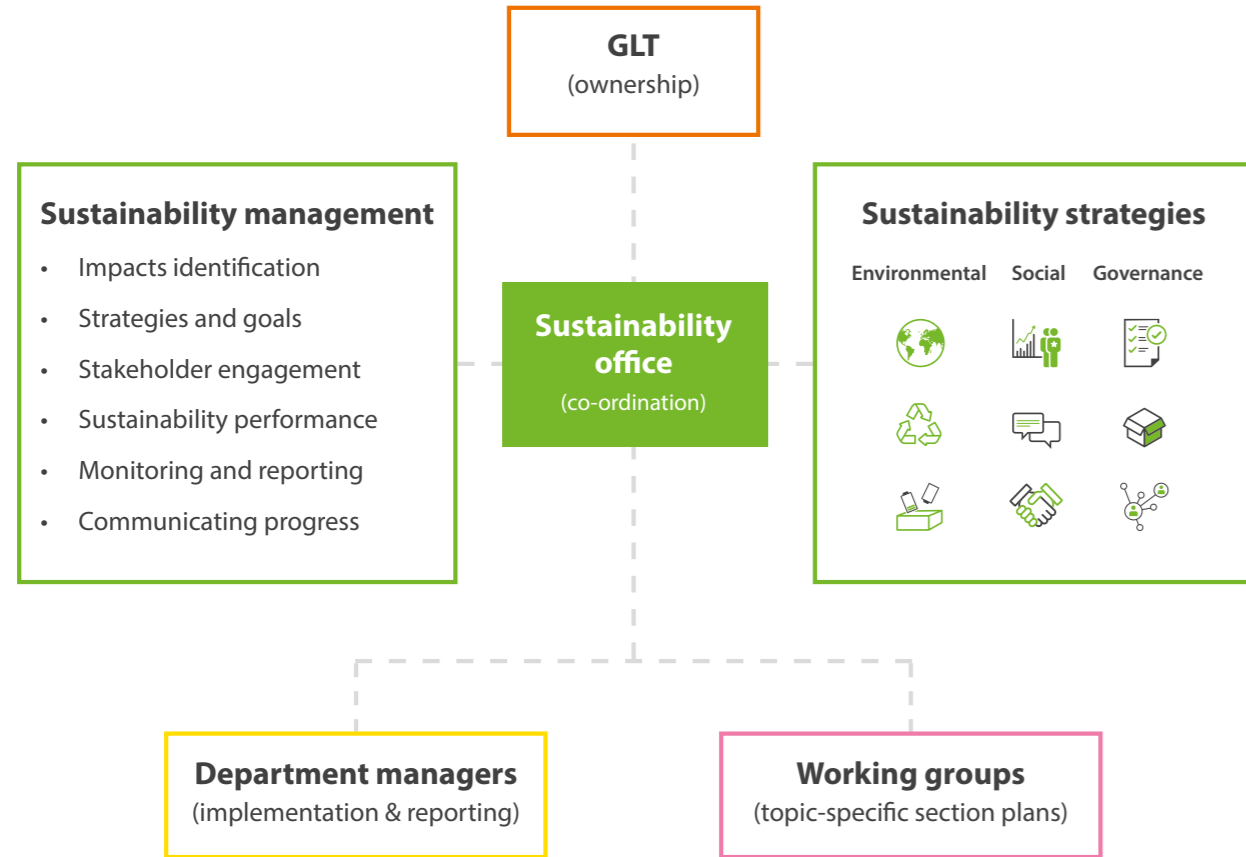
We also value feedback, opinions and expectations from our external stakeholders across our value chain. The responsibility to identify these concerns and input lies with managers, and all Group employees who are the point of contact for external stakeholders.

The sustainability office shall investigate the context of the concern and the nature and size of the impacts.

When the concern is considered critical (when the activities of the companies have actual or potential negative impacts), the sustainability office will report it to the GLT and, where appropriate, coordinate with managers and other stakeholders to promptly manage the impacts in line with the Group's sustainability strategy.

All sustainability-related views, feedback, input and concerns can be shared by all internal, as well as external stakeholders with the sustainability office at: [sustainability@landbellgroup.com](mailto:sustainability@landbellgroup.com).

## Organisational structure for the management of sustainability impacts



## Business ethics & compliance

### Conflicts of interest

Managers, members of the GLT, as well as employees having signatory powers, ensure they have no conflict of interest with the interests of Landbell Group and are held responsible to inform the company about any of their own or their relatives' activities which may place them in a position of conflict.

GLT members, country managers and members of the Board in each company complete and sign a conflict-of-interest statement when they take up their position and update it in case of change. Employees who have private interests which might affect the way they perform their tasks, are expected to disclose them to their line manager and fill in the form.

Particular attention is given to situations where a person is a member of several boards or holds cross-shareholding relationships or transactions with related parties. Until now, no such situation has been detected.

### Membership associations and advocacy groups

Landbell Group is actively engaged in multiple organisations and associations, contributing its practical experience in managing the collection and treatment of multiple waste streams in multiple countries. For the list of engagements, please refer to the Appendix.

## Communication of critical concerns

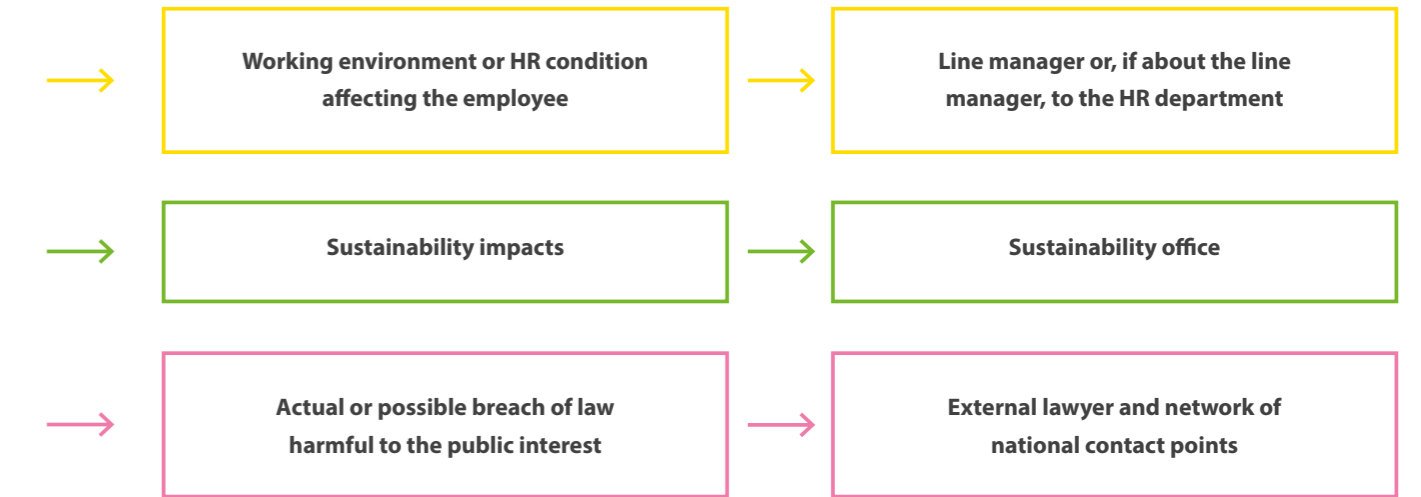
We recently published our system for raising concerns.

This system allows our internal stakeholders to raise concerns they might have in relation to their employment or Landbell Group's business through three channels:

1. **Concerns raised** by employees about employment conditions are addressed to the line manager or human resources department
2. **Sustainability issues**, including environmental and human rights impacts, will be managed by our sustainability office, and
3. Although not obliged by law in all countries where the Group is operating, we have implemented a **whistleblowing system** that covers all entities of our Group, allowing for easy and anonymous reporting of actual or potential issues related to our activities

In 2022, no significant instances of non-compliance with laws and regulations occurred, nor did any relevant fines have to be settled.

### Channels for raising concerns



# Our employees.

An engaged workforce is a prerequisite for our high-quality service. This requires a high level of employee wellbeing and engagement, which in turn, is driven by workplace quality, working conditions and career opportunities. Therefore, we seek to continuously strengthen the personal and professional development of our employees.

Our employees are of diverse origins and age groups, and they demand more than just fair compensation. They want to contribute professionally, have the opportunity to grow, feel appreciated and, at the same time, find room for their private lives.

As an employer, we try to take all of this into account, because we know we are competing for the best.

Employees	Total	Male	Female
All (internally hired)	430	206	224
Permanent	408	195	213
Temporary	22	11	11
Non-guaranteed hours	13	5	8
Full-time	384	194	190
Part-time	33	7	26
Worker (external - not employees)	13	8	5

## Human capital strategy

Landbell Group pursues a modern human capital strategy. We are internationally oriented and therefore hire people of different nationalities. Since many of our teams are already international, our corporate language is English, even in our German headquarters.

A special feature of the Group is its decentralised structure with employees based across the globe. We offer the possibility of teleworking and mobile working as roles and tasks allow.

Our global presence allows us to find the most suitable colleagues for the task. In addition, our flexible working arrangements help to avoid unnecessary relocation to another region or country. Such structures promote the exchange of knowledge at the Group, broaden our employees' viewpoints and enrich all our intercultural competence.

Many other factors make our company attractive to newly qualified, well-trained people.

Our hierarchies are flat, our opportunities for professional development are virtually unlimited, and we have far-reaching corporate benefits.

In addition, the Group's field of work is particularly interesting. We are not a typical waste management company, but a management and consulting firm that develops solutions to reduce waste and pollution.

Our concepts make a relevant contribution to the circular economy, not only in Europe but also in developing countries. This appeals to young people who see the benefit that the Group provides for the planet and society.

At the same time, this is precisely why working at Landbell Group is challenging. We operate as an interface between business and politics that is shaped by constantly changing international requirements. Anyone joining the Group requires expertise in their field, and an unconditional willingness to think outside the box and keep learning.

To retain such rare and talented people, we strive to be an inspiring employer. This is reflected in our corporate culture, as well as the employee-related initiatives described on the next page.

## Corporate culture

Our corporate culture is guided by the Fantastic 5 principles.



We are proud of our disruptive spirit and are always seeking to innovate and improve. We push hard to grow our Group, our Teams, and our individuals.



We are agile and move at pace to meet the demands of our fast-moving industry. We are personally accountable for what we do and for on-time delivery.



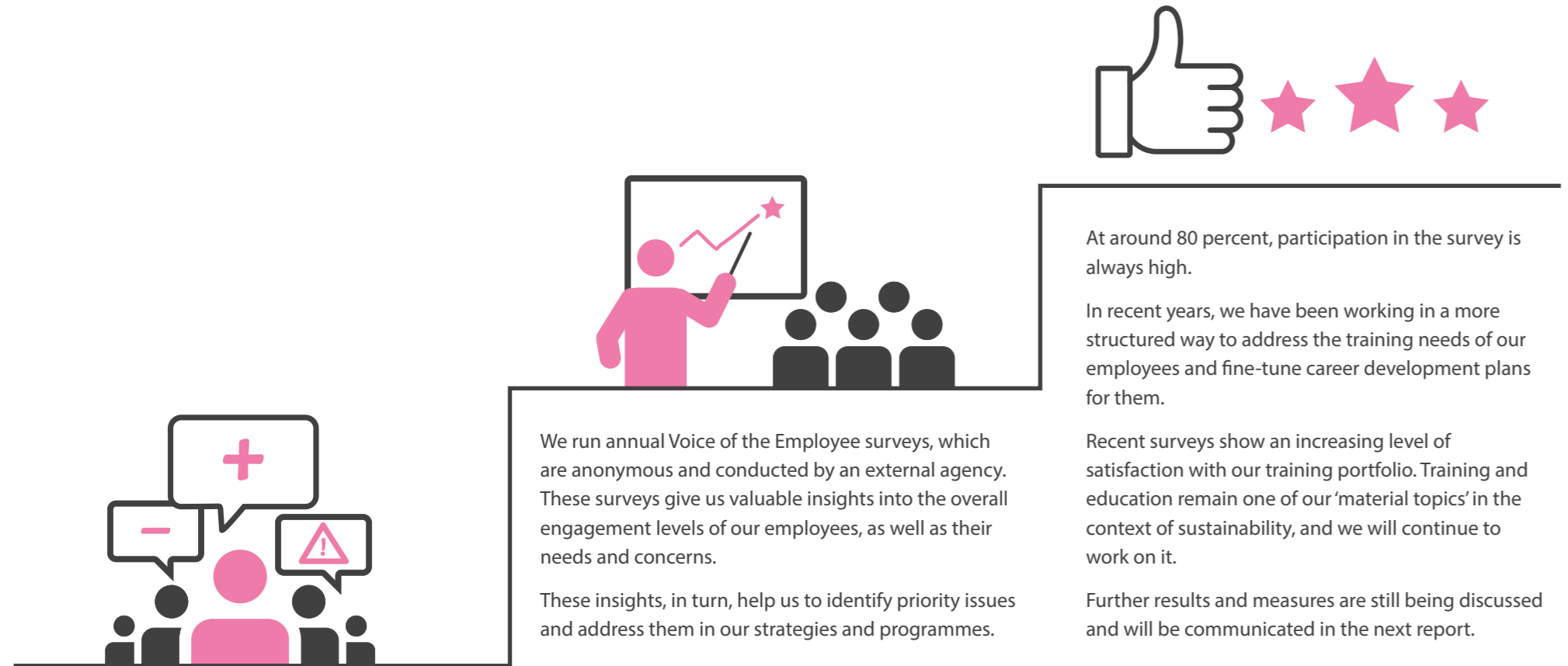
We treat our people with dignity and support their growth. We show respect to earn respect.



We ensure that our customers receive consistently great service every time and at every touchpoint. We put the customer at the heart of all decision-making.

We are a global organisation, but we resist falling into silos. We share, learn and work as one to go far.

## Voice of the Employee surveys



At around 80 percent, participation in the survey is always high.

In recent years, we have been working in a more structured way to address the training needs of our employees and fine-tune career development plans for them.

Recent surveys show an increasing level of satisfaction with our training portfolio. Training and education remain one of our 'material topics' in the context of sustainability, and we will continue to work on it.

Further results and measures are still being discussed and will be communicated in the next report.

We run annual Voice of the Employee surveys, which are anonymous and conducted by an external agency. These surveys give us valuable insights into the overall engagement levels of our employees, as well as their needs and concerns.

These insights, in turn, help us to identify priority issues and address them in our strategies and programmes.

## Training & development

In 2021, we set up a learning hub on our intranet and, as a first step, provided training courses that had been requested in the annual appraisal talks between employees and their managers.

By the end of that year, many self-learning courses on office applications, languages, internal processes and working skills had been made available there. All employees have access to the courses and can work through them without restrictions, including during working hours.

In 2022, the average training time per employee across the Group amounted to more than 18 hours. We plan to track and report training time by employee category and gender more precisely in the future.

### Training offered in-house

- Leadership training
- Management training
- People management
- General business
- Sales training
- Operations skills
- Communications skills
- Project management
- Presentation skills
- Time management
- Technical skills
- Language skills
- Product knowledge

In 2021, we also launched a mentoring programme that connects young colleagues with employees of outstanding expertise. It is one of the personal development opportunities that employees can explore as a component of the annual performance review and career development planning process.

The programme runs for three to four months at a time, with three mentor and mentee tandems in the first pilot round. The 2022 programme had six tandems and five more tandems are planned for 2023.

We will continue the programme for selecting mentors and mentees with specific training for the enlarged mentor base in the coming years.

In 2022, we set up the Landbell Academy – a development programme for high-potential colleagues that benefits up to 16 employees per year.

The selected employees go through an extensive 7-month training programme in which they can increase their knowledge of professional and managerial skills.

The programme consists of six days of in-person modules, five webinars and project work with specific topics assigned by Landbell Group's top management. Additionally, each trainee goes through a personal growth programme with one-to-one coaching and assessment sessions with trained consultants.

The programme is managed by a senior executive, together with an external service provider.

## Diversity, equity & inclusion

Landbell Group is committed to providing a working environment where all employees have equal opportunities regardless of race, colour, age, gender or any other distinctive moral and physical characteristics. This applies to all phases of employment, from recruitment to promotion, and from performance evaluation to compensation benefits.

Diversity, equity and inclusion are priority topics for our company's personnel development strategy for 2023 and beyond.

The Group as a whole is already highly diverse in terms of nationality, age and origin, and more than half of its employees are female. We are committed to replicating similar diversity across all leadership roles and our governance bodies.

In line with this commitment, a project team from the Landbell Academy was assigned to investigate the topic of diversity and equal opportunities across the Group. The learnings from this exercise will lay the foundation for our improvement actions in the coming years.

## Fair compensation

Money is not everything, but it does mean appreciation, especially for special achievements. This is why most salaries at Landbell Group have a fixed and variable component. The variable component is based on the fulfilment of individual and team targets.

In the coming years, we plan to increasingly link individual and team compensation targets with sustainability-related goals and performance as defined by the Group's sustainability strategy.

When determining remuneration, various factors such as market benchmarking, position, knowledge and experience are considered. The budget is prepared by department heads, with guidance from the financial and human resources department and is ultimately approved by the GLT.

Annual appraisal talks are conducted as part of this process. Salaries are benchmarked by consulting companies and are between the midpoint and maximum range of comparable positions in the market.

More than 96 percent of our employees receive a standardised annual employee performance review. In addition to discussing target agreements and training measures, the process also includes an assessment of how the employee fulfils the Group's guiding principles.

## Collective agreements

Landbell Group has always endeavoured to be a model employer in terms of aligning with local industry collective agreements. While our activities are in some cases difficult to classify according to existing working sectors, some Group affiliates have joined national or local collective agreements, which cover about 17 percent of employees in total.

Where our employees are not covered by any collective bargaining agreement, the employment conditions are based on national employment laws and industry best practice.

Some conditions may be upgraded by local management, but there is no structural relation with collective bargaining groups from other industries. Our compensation rates are typically higher than the rates set by collective agreements in comparable industry sectors.

# Our services.

Landbell Group focuses on circularity by providing solutions for extended producer responsibility (EPR), which is sometimes also called product stewardship. In so doing we align the interests of our customers with the interests of society. We contribute to sustainability by sharing our knowledge and bringing different stakeholders together.

Our core competencies create transparency, transfer knowledge, and develop and implement solutions that promote circular business. The digital backbone of our activities is our software that connects our processes and enables intelligent data analysis.

## Resource management

At Landbell Group, the development of circular economy solutions is our most important mandate. Our work has significant social relevance. It is also crucial for our customers who are increasingly seeking to make their products more recyclable to close the materials loop.

To help them achieve this, we not only provide operational support, but also act as experienced consultants who monitor global obligations.

In this chapter, we explain what we believe are our key impacts for developing the circular economy.



## Main regulatory context affecting our field of work

- EU Waste Framework Directive, revision upcoming
- EU Packaging Directive, under revision
- EU WEEE Directive, revision upcoming
- EU Batteries Directive (new EU Batteries Regulation published in July 2023, but not yet enforced)
- Basel Convention / EU Waste Shipment Regulation, under revision
- EU Single-use Plastics Directive
- EU Ecodesign/Sustainable Products Directive, under revision
- EU REACH Regulation, under revision
- EU RoHS Directive, regularly amended
- EU Persistent Organic Pollutants (POPs) Regulation, recently amended

**In addition:** An increasing amount of national legislation globally, existing or in development

### Facilitating material flow transparency

The central theme in all our work is to facilitate material flow transparency – to ensure compliant waste management and zero pollution. This issue is of great social importance and is increasingly relevant to our customers. How we create this transparency is described below.

Our goal is to expand transparency and traceability further down our supply chain, especially where critical or hazardous material fractions from the recycling of packaging, waste electrical and electronic equipment (WEEE) and battery fractions are concerned.

This will allow us to not only take a further step towards reducing environmental and human rights risks in our supply chain, but also to facilitate access for our customers to these materials, especially when they are valuable as secondary raw materials.

A marker of success is the construction and development of a secondary raw materials market, which is part of national and regional strategic plans, such as the [European Green Deal](#) and the [Circular Economy Action Plan](#).

In this respect, Landbell Group is pulling together with European institutions and many other stakeholders to bring about this change for the benefit of society at large.

We are currently prioritising these two main points:

- Which fractions have the most relevant social impact? (Impact materiality)
- Which fractions have the greatest influence on our business development? (Financial materiality)

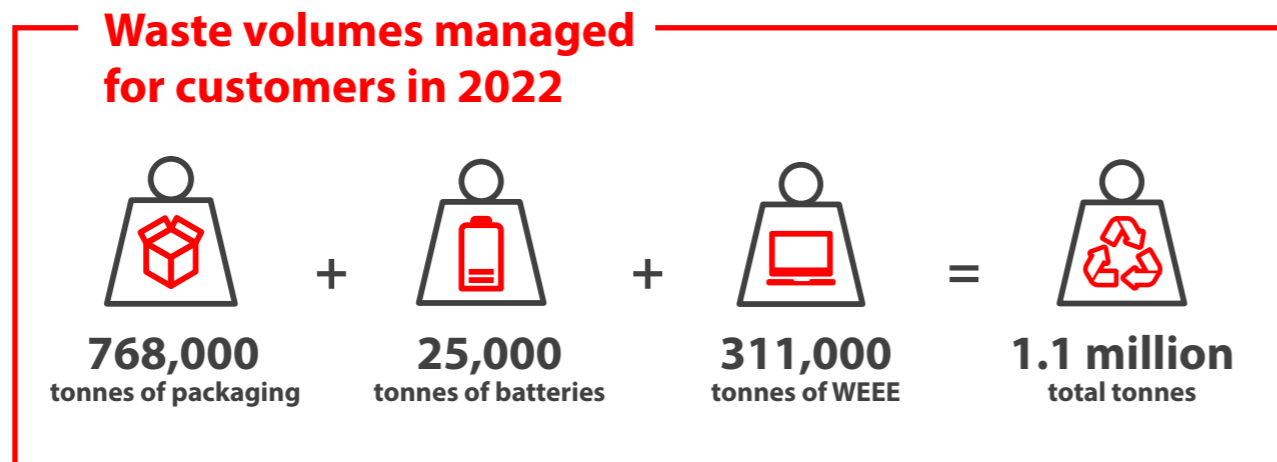
In the future, we plan to report additional details on the waste volumes we manage on behalf of our customers. This will include the types and origins of waste fractions we collect, their subsequent processes and destinations of treatment.

We will also respect transparency requirements arising from the EU Waste Framework Directive and other waste-specific policies such as reporting obligations defined in the new European Battery Regulation.

This long-term project requires considerable effort and collaboration with our stakeholders.

We are currently consolidating information from all our entities, which helps us to accurately disclose these details and enables us to address the topic through proper management strategies.

We plan to publish regular interim status updates on this topic in our upcoming sustainability disclosures.



### Producer responsibility approaches

We usually take on the following legal obligations on behalf of our customers:

- Keeping records of all units and weights placed on the market by customers
- Reporting this data to the authorities
- Organising recycling and takeback operations to reach the targets based on the volumes and materials declared by customers, and
- Reporting on required indicators such as collection and recycling performance to customers and authorities

### Assessment of obligations

We help producers to assess their extended producer responsibility (EPR) obligations globally, considering their product portfolio, sales models or where they are based. If they wish, we can oversee all cross-border registration processes and, if they enter a new market, arrange for and manage disposal services.

### Monitoring EPR obligations globally

We also offer regulatory tracking of global EPR obligations for waste electrical and electronic equipment (WEEE), batteries and packaging with various products ranging from dedicated reports to our Knowledge Database (KDB).

While the reports can be delivered in a bespoke or predefined format, on a one-off or regular basis, the KDB provides subscribers with constant access to the latest information on core producer responsibilities, including takeback, product design, consumer information, registration and reporting – in just a few clicks.

Our regulatory tracking services are available for around 200 jurisdictions in Europe, Asia Pacific, the Middle East and Africa, Latin America and the Caribbean, and North America (USA and Canada).

### Circular economy services

While EPR is a legal instrument for managing consumer waste, other takeback programmes focus more on ensuring that valuable raw materials are kept in the production cycle.

### Voluntary takeback programmes

Some producers offer return options voluntarily to meet their environmental commitments, improve customer satisfaction and, in some cases, take back their materials or components.

We have a special team that deals with what we call ‘circular economy engineering’. The team advises customers on takeback and organises the return of their products.

### Compliance for online retailers

For consumers buying from online retailers, we offer a digital platform (‘One2One’) where consumers can register their used or defective electrical and electronic equipment for collection.

This retail takeback obligation – which must be offered at no charge to the consumer – is under the scope of the EU WEEE Directive and related national transpositions.

## Best practice in Brazil

In 2022, Landbell Group continued to participate in the implementation of the developing Brazilian EPR system for WEEE, which stretches across 13 states and over 25 cities in the state of São Paulo. This is a massive undertaking, which covers half of the country and benefits more than 69 million inhabitants.

We also supported the federal government with the implementation of WEEE consolidation centres in Brazilian state capitals.

Further development of the national network of collection points, consolidation centres and recyclers is expected to increase collection and ensure the traceability of waste.

Our EPR services for packaging guarantee the acquisition and traceability of packaging waste credits for post-consumer packaging.

In addition we developed consulting services for national industry and advised the Brazilian government.

In partnership with the National Association of Paper and Wastepaper Wholesalers, and a large packaging manufacturer, we ran a pilot project to increase the recycling rate and profitability of wastepaper.

## Awareness and support for circularity

We see raising awareness for resource conservation, recycling and a circular economy as one of our most important tasks. It is part of our founding mission.

In some European countries, we have the legal obligation to conduct education campaigns for end-users, to increase knowledge about sorting and recycling. Incorrectly separated waste is a big challenge.

### Mülltrennung wirkt

In Germany, for example, we are involved in the 'Mülltrennung wirkt' ('Waste separation works') campaign which has been running since 2020. To target all generations, the campaign uses a multi-channel approach, including TV, radio, digital, a PR campaign and social media

### CirculArt

In Spain, our visual art and photography project [CirculArt](#) was named one of the '100 best ideas of the year' by the newspaper El Mundo in 2022. CirculArt is an awareness campaign that showcases Spanish artists and their works on sustainability. Selected works were shown in an exhibition in Madrid and subsequently online.

### Moda na Recykling

In Poland, we work with children and teenagers to raise awareness of proper recycling. One example is a very popular event, [Moda na Recykling](#) ('Fashion for recycling'),

which consists of a series of workshops during which young people, guided by a professional fashion designer, create clothes made from end-of-life devices. During the finale, the clothes are shown on the catwalk by celebrities. The event is publicised by the media and reached 6.6 million people in 2021, and 2.9 million people in 2022.

### Green Alley Award

Our [Green Alley Award](#) has a truly big impact: it was the first award to promote startups in the circular economy. Over 1,600 innovative new ideas have been submitted for the chance to win the €25,000 prize. We have awarded the Green Alley Award to nine winners since 2014.

The Green Alley Award fosters young founders and connects them to our network of circular economy experts across Europe. The startup award showcases promising sustainable business solutions before they enter the mass market and offers established companies new sustainable alternatives to improve their products, services and supply chains.

The 2023 award went to the Ukrainian startup S.Lab for their innovative green packaging solution. A total of 226 startups applied for the award in the categories of digital circular economy, recycling and waste prevention. Other recent winners include Voltfang, traceless materials (both from Germany), Repack and Sulapac (both from Finland), all of which are now well-established in their respective markets.

## Chemical compliance

Landbell Group is engaged in product stewardship for four product groups: waste electrical and electronic equipment (WEEE), batteries, packaging and, increasingly, chemicals.

For the first three groups, product stewardship is legally manifested in waste legislation and for chemicals it is mandated through market entry legislation. In all cases, the aim is to mitigate their negative impacts on human life and ecosystems, which ultimately underpins circularity.

### Consultancy, services and software

The Group provides a broad range of consultancy, services and software in chemical regulatory compliance. We ensure market access for our clients wherever chemical control legislation places obligations on their products or supply chain.

Like our activities in the extended producer responsibility (EPR) sector, our activities for chemicals go far beyond this remit. We analyse our customers' portfolios, provide them with an overview of which chemical substances may be problematic, and advise them on how they can replace 'substances of concern'.

The foundation of our activities is our Element1™ software, an integrated software-as-a-service (SaaS) platform in which we bring together all regulatory and product information and present it to customers to show them where action is required.

### Changing regulatory landscape

We are currently undergoing a period of regulatory change through a [REACH revision](#) – which aims to further enhance human health and the environment and to encourage innovation and greater sustainability – with strong links to the [EU Green Deal \(2019\)](#) and the [Chemicals Strategy for Sustainability \(2020\)](#).

In parallel, Hazard Communication (HazCom) obligations are becoming more strenuous in the EU, through its [Classification, Labelling and Packaging \(CLP\) regulation](#) and the US has moved to [modernise its own HazCom scheme](#).

The regulation of 'forever chemicals' – predominantly per- and polyfluoroalkyl substances – has received significant attention in both the [EU](#) and the [US](#), along with the problematic areas of polymers and nanomaterials.

Meanwhile, the [European Chemicals Agency \(ECHA\)](#) is accelerating its efforts to address risks in chemical supply chains through its 'Grouping' efforts to deal with multiple chemicals in tandem.

## Improved support to customers

Landbell Group has expanded its services and team to improve support to customers for product and chemical stewardship, substances of concern, hazard communication, and the requirements of [REACH](#), the Globally Harmonised System of Classification and Labelling of Chemicals ([GHS](#)), and similar legislation around the world.

In particular, we expanded our software, which now also tracks and highlights substances of concern. It does this to risk assess the inclusion of chemicals and to accelerate their removal from our customers' products: to avoid regrettable substitution with a chemical with similar risks. This enables our customers to consider alternatives in a timelier manner.

Like our EPR offering, our broad range of services gives us a unique selling point in the market. We support the chemical compliance needs of six of the world's top 10 pharmaceutical companies. More than half of our customers are US-based.

On the next page, you can read more about the work that we do globally to support our customers.

## Poison centre notifications (PCNs)

We report the composition of hazardous products to the European Chemicals Agency (ECHA).

Look at the label of your dishwashing detergent. On it, you will find a 16-digit code. This means that the components of your detergent have been reported to ECHA, which shares the information with all EU poison centres, enabling a parent or doctor to receive immediate and accurate advice on the potential poisoning incident when they call.

## Chemical registration under REACH

Chemicals placed onto the EU market at 1,000 kg per year require registration with ECHA.

We support companies with this activity, as well as those outside the EU, where we provide an Only Representative service, taking on activities which would otherwise sit with their EU customers.

## Hazard communication

Where a chemical substance or mixture is hazardous according to the rules agreed by the United Nations in the GHS, this drives a requirement for accurate and consistent hazard communication.

This includes labelling and a Safety Data Sheet which must be consistent and communicated over online platforms for those companies engaged in 'distance-selling' – an area which is significantly non-compliant according to recent ECHA inspections.

## Market entry in India

Landbell Group entered the market in India in 2021.

Our activities in 2022 mainly focused on the development of EPR services for waste plastic, which we deliver to large local and global fast-moving consumer goods companies.

We are also monitoring the development of the Chemical Regulation to assist local companies with their compliance efforts, as well as existing customers who place their products onto the Indian market.

## Digital solutions

Landbell Group is a data-driven company. Everything we do as a consulting or service company is based on the aggregation and analysis of digital information.

Therefore, one of our main pillars is the development of software for the management and digitalisation of the circular economy. Our software is developed for company use and distributed in a software-as-a-service (SaaS) model.

We have two integrated software tools: Circul8® for Transaction, Producer and EPR Data management, and Element1™ for chemical compliance.

### Circul8®

Circul8® covers all aspects of circular economy operations and manages extended producer responsibility (EPR) obligations. It is built to support various user groups ranging from producers, producer responsibility organisations (PROs) and authorities, to logistics and recycling partners.

It accommodates various regulatory and market requirements, and reduces complexity for producers and importers to an absolute minimum. For global players, the system provides a control tower overview of their EPR status.

### Element1™

Element1™ was launched at the outset of REACH in the EU for Only Representative services, dossier authoring, HazCom and project management services, and has expanded to support tonnage management, supplier compliance, dossier updates, poison centre notifications (PCNs) and substances of concern in products (SCIP) notifications, as well as similar duties in other jurisdictions.

We have diversified our service offering with a more digital approach towards smaller customers and increased the number of online customers that we support significantly.

### Point-of-sale platforms

Our point-of-sale platforms are 'Click and Comply' for waste electrical and electronic equipment (WEEE) and batteries and 'EASyShop' for packaging.

## Circul8® manages

**Transactions:** Running collections networks by handling pickup requests, coordinating supplier networks, tracing volumes, collecting evidence notes, and completing invoicing

**Producers:** Operating PROs by collecting put-on-market declarations, and running fulfilment and invoicing operations

**EPR Data Reporting:** Calculating takeback obligations, optimising product end-of-life cost, and automating actual put-on-market reporting

## element1™ enhances the delivery of

- REACH and worldwide REACH-like compliance services
- Global supply chain compliance
- Tracking Substances of Concern
- Meeting Classification and Labelling obligations



## Data security

The security of customer data and the confidentiality of information are of the greatest importance to Landbell Group. We always ensure that confidential information is protected against access by third parties. Employees who have access to or control confidential or proprietary information are trained to take the appropriate and prescribed security precautions to prevent misuse and disclosure.

### Protection of privacy

As far as privacy is concerned, all Group entities located in Europe implement the [General Data Protection Regulation \(GDPR\)](#), while entities located overseas implement the respective local privacy laws.

In both cases, our employees receive training and are regularly tested on their understanding of the rules and their role in implementing them.

## Security and cyber crime

We have the legally required technical and organisational processes in place to keep data safe. We commonly pass our customers' cyber security audits with flying colours.

All employees are trained and tested once a year in GDPR, data confidentiality and IT security. We also run awareness campaigns, especially when onboarding new colleagues.

The major challenge in data security is cyber crime. The risk is growing and, in our opinion, still underestimated. Currently very popular are social engineering techniques, which trick employees into giving up sensitive information. Recognising these risks is part of our training.

Through our activities in waste management, we are closely linked to the critical infrastructure of municipalities: waste needs to be moved, so that it does not cause health hazards to the public. Ensuring the resilience of our company's operations is therefore essential.

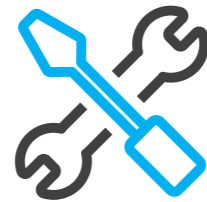
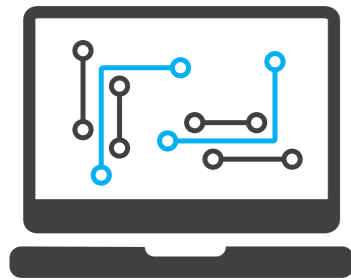
## Minimising downtime and disruption

Business continuity plans in operational entities outline how to operate if our IT systems become unavailable.

They include processes for identifying critical business functions, prioritising resources and establishing alternative methods for communication and data management.

In the case of an unexpected disruption, this helps to minimise downtime and allows us to continue to deliver our services.

In addition, a disaster recovery plan is focused on restoring our IT systems and data in the event of an outage or disruption. It includes prescribed processes for backing up data, restoring systems and testing the entire procedure.



## Policy & advocacy

Landbell Group is proactively involved in policy and advocacy. Due to our multi-country and multi-waste stream operational experience, the Group makes knowledgeable contributions to the public debate.

### Circular economy

We are firmly convinced that extended producer responsibility (EPR) can be a highly functional tool to support the circular economy. To fulfil this function, EPR-related policies in Europe need to be wisely updated, amended and linked to the strategic aims of the EU Green Deal.

The Group advocates for a ruleset stimulating investment and creating an attractive market for secondary raw materials, so that more material is kept in a circular economy.

## Roles and responsibilities

We stand for clear roles and responsibilities for all actors involved in EPR, effective enforcement creating a level playing field, and empowered consumers who fully understand their important role.

We have been actively engaged with policy development at national and European levels for many years now. We contribute to discussions, attend stakeholder workshops, support research and contribute to studies conducted by European institutions.

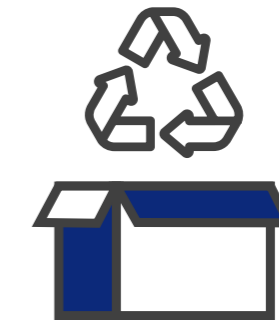
For our clients, we aim to ensure cost-efficient EPR solutions with ambitious yet realistic targets. We also advocate for harmonised obligations with reasonable administrative efforts.

As we aim to deliver effective EPR solutions for producers, in 2022 we closely engaged with their associations, for example, on a [joint position paper](#) with the European Portable Batteries Association.

### Transparency

Landbell Group and its subsidiaries are registered on the [EU Transparency Register](#) which lists organisations that endeavour to contribute to the law-making and policy implementation processes of the EU institutions.

The register allows for public scrutiny, giving citizens and other interest groups the possibility to track the activities of lobbyists. Our fields of interest, activities and the strategies we pursue are listed there. In line with our business ethics on transparency, our strategy papers and research are also published on our [website](#).



## Our major contributions to EU policies in 2022

### Batteries

The recently published (July 2023) [Battery Regulation](#) aims at modernising the regulatory framework, reflecting the latest applications and technologies, as well as the high strategic importance of batteries for the European economy.

Holistically addressing the lifecycle of batteries, the new regulation is considered a blueprint for other future legislation.

We closely engaged with the institutions, addressing specific points such as the need for precise battery definitions, and a more realistic calculation method for collection targets that is not based solely on the quantity of batteries placed on the market, but on the quantity that is available for collection, considering the steadily increasing lifetimes of batteries.

### Packaging

The [revision of the Packaging Directive](#) aims at adapting its requirements to developments in the packaging market and the overall targets of the EU's Green Deal. The goal is to ensure that all packaging in the EU market is reusable or recyclable in an economically viable manner by 2030.

The Commission's draft in November 2022 launched the political process. We supported the Commission with proposals and a study on modulated fees – and will continue to monitor and engage with it.

### Waste Electrical and Electronic Equipment (WEEE)

An [evaluation of the WEEE Directive](#) run by the Commission in a stakeholder consultation is expected to provide evidence on whether the Directive is still fit for purpose, explore any untapped potential for optimisation and determine whether a review is needed.

We contributed to the evaluation, raising topics such as the need for a revised calculation method for collection targets, which considers the lifetime of products.

We also asked for better enforcement and closer involvement of the consumer through coordinated awareness-raising.

### Waste Framework

The European Commission is [planning a targeted revision](#) to reduce waste generation, increase reuse and improve separate collection for better reuse and recycling.

We contributed to the stakeholder consultation and will engage in the forthcoming revision process.

## Global development support

In 2020, Landbell Group started sharing its extended producer responsibility (EPR) expertise by providing advisory services, notably in the Middle East, North Africa and Asia.

Projects are funded by organisations such as the [World Bank](#), which provides financial assistance to developing countries, or the [German development agency \(GIZ\)](#), which focuses on sustainable development, poverty reduction and peace-building. GIZ, like the World Bank, collaborates with governments, private sector organisations and civil society groups to achieve their goals.

### Implementing EPR

We support the programmes and projects funded by these donors in the design of EPR policies and frameworks and support their implementation. Currently, we are active in low- and middle-income countries (LMICs), especially in Algeria, Egypt, Morocco, Tunisia, Indonesia, the Philippines, Thailand, Vietnam, Ghana and Nigeria. Our focus is to combat plastic waste, but some projects also address electronic waste or other waste streams.

Reducing plastic littering is crucial for protecting the environment, promoting public health and supporting sustainable economic development. LMICs typically have limited waste management infrastructure, combined with high population densities and rapid urbanisation, which all contribute to the proliferation of waste in the environment.

Plastic is burned or dumped in open areas. It can clog drainage systems to a degree that causes flooding. Sometimes, a large tourist sector exacerbates the problem by increasing the volume of plastic used and released, particularly into the ocean, increasing the damage to marine life and ecosystems.

### Building waste infrastructure

The best way to reduce the waste problem is to build a functioning waste infrastructure.

But this is expensive and organisationally complex for municipalities. The simplest way is therefore to make the producers of plastic or plastic products legally responsible for properly disposing of them, as is the case in Europe. EPR thus creates the financing with which a valid waste infrastructure can be built.

When we are involved in projects funded by international institutions, our task is typically to analyse the conditions in the target country and make practical proposals for the implementation of a viable EPR system.

### Contributing expertise and experience

Our expertise is in great demand because we provide 40 PRO services for waste electrical and electronic equipment (WEEE), batteries and packaging, most of which we have designed and built, in 17 countries around the world.

We have broad experience at the interface between policymakers, producers and waste management companies, and we know what needs to be done to adapt EPR for different markets. The projects benefit from our knowledge and, in turn, allow us to assess potential markets where our presence could be needed.

### Integrating the informal sector

An important social task is usually to integrate the informal sector, consisting mainly of waste pickers and aggregators, into such EPR schemes.

Waste pickers make a living that is heavily influenced by material value, and they often lack bargaining power. Mostly, they are treated as traders: their pay is not based on the time they spend or the work they do, but on the value of what they collect, which is particularly risky when raw materials prices go down. And, of course, they only collect waste that makes a profit, so not all waste is collected.

Therefore, it makes a lot of sense to include informal sector workers in the concept development for an EPR system.

In many countries, the sector may even be formally represented by an association, with which we then exchange information. In one West African country, for example, we are developing a remuneration concept based on input from the waste pickers, which the authorities could then use as a guideline for the privately operated EPR schemes.

Besides solving the waste problem, EPR can therefore create jobs and improve the livelihoods and standing of those already working in the field.

### Marine litter in tourist areas

In 2022, our multi-year project [TouMaLi](#), addressing marine litter in the tourism sector of the south Mediterranean, gathered momentum, with the selection of pilot areas in Egypt and Tunisia. The project was also launched in Morocco.

Our contribution in 2022 included the development of an institutional and financial concept, and capacity building for EPR in Egypt. In Tunisia, we reviewed how the packaging waste streams from the tourism sector could be financed, considering the existence of a packaging waste public management system (for more information, please see the text box on the next page).

### Plastic waste in Southeast Asia

We completed a project in Southeast Asia on plastic waste, where we supported local experts and stakeholders in Indonesia, the Philippines, Thailand and Vietnam.

### Problematic e-waste fractions

Another highly interesting project commissioned by GIZ for the [PREVENT Waste Alliance](#), and carried out by Landbell Group, was finalised in 2022.

The project aimed to find both treatment and financing solutions for WEEE fractions for which recyclers in LMICs have no local solutions: so-called problematic e-waste fractions.

Following a survey completed by 25 recyclers in the target regions (Balkans, South America and East/West Africa), the focus was narrowed down to treatment pilots for e-waste plastics, polyurethane foams and lithium-ion batteries. An additional pilot looking at exporting a mixed shipment of lamps and printer cartridges was explored in Senegal.

We provided technical and methodological support to the selected e-waste recyclers, set up treatment pilots for the three waste fractions and the mixed waste load, and designed models for financing the treatment processes until EPR is in place. We also provided training on plastic sorting and battery technology.

When we are involved in these development projects, we shape the best recommendations we can, but we are not the owners of the steps that need to be taken to put them into practice. Often, legislation needs to be adapted and then enforced. It can take several years before a project takes off.

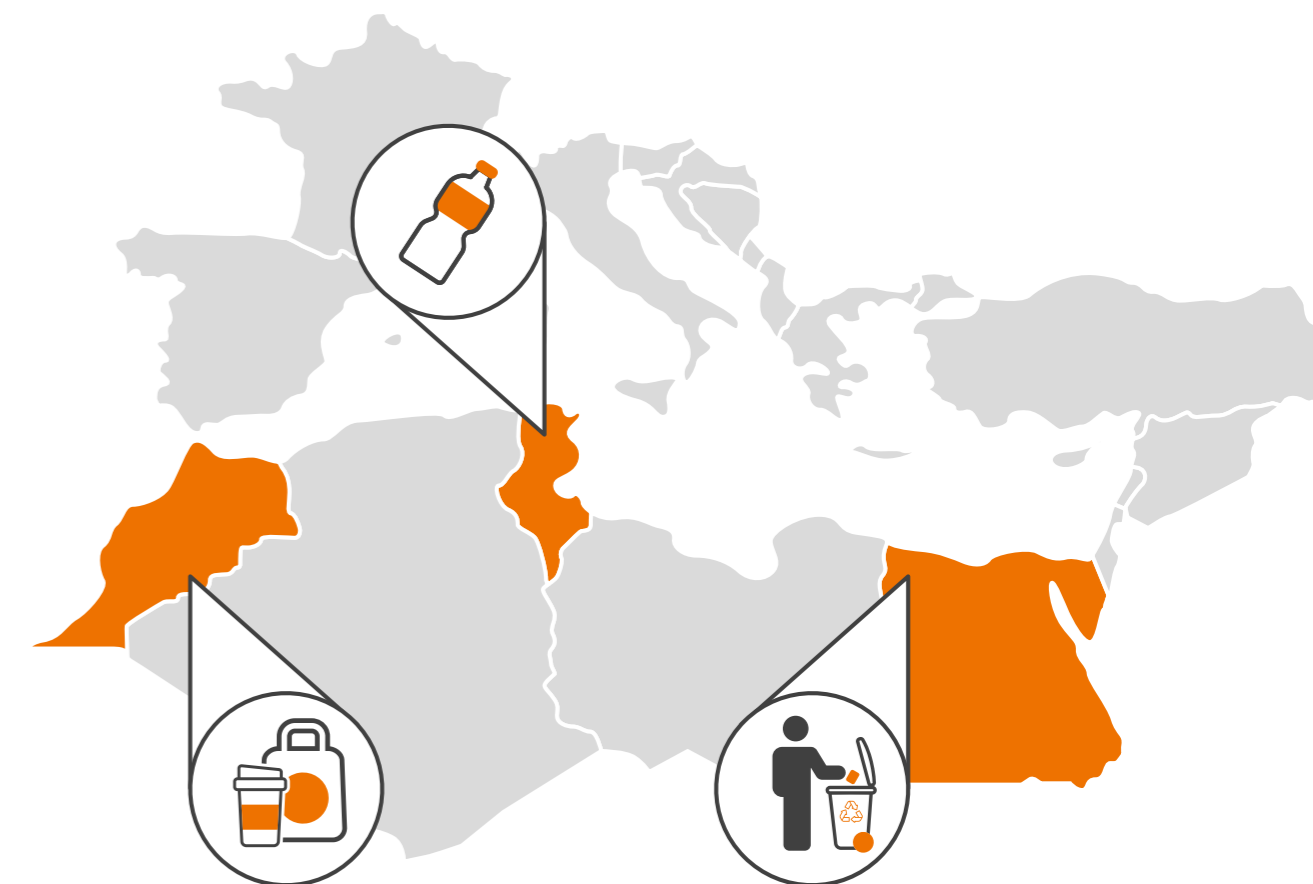
## TouMaLi management of waste from tourism

An EPR scheme for plastic waste is to be set up in Egypt, but the implementation will take time. The plastic problem is urgent though, and needs quick action.

Since the tourism industry causes a considerable amount of plastic littering and, at the same time, would benefit most from clean beaches, we are working with the tourism sector in our pilot project in Alexandria.

The sector will finance the infrastructure for management of packaging waste, arising out of their businesses in the area. This will be done alongside the current development of EPR in the country under the leadership of the Waste Management Regulation Authority.

The results of the pilot project are to be shared with other tourist areas to scale up the impact.



## Research & development

Landbell Group is engaged in multiple activities to provide secondary raw materials to its customers, so that they can implement truly closed-loop solutions. In 2022, we again stepped up our R&D activities for better recycling, engaging in the design of sustainable packaging and exploring advanced recycling technologies for packaging waste.

We want to enable product circularity through innovation and collaboration with value-chain stakeholders. This is why we are in contact with producers on circular product design, and develop separation and recycling concepts with disposal companies, so that materials can be reused.

We facilitate the exchange between our stakeholders along the value chain and help to create the transparency that the economy needs, to close the loop for material use.

The Group sees itself as an innovation driver. We want to be a broker of ideas and provide inspiration where energy and resource consumption are particularly high.

Contributing to the circularity and availability of secondary raw materials is one of our material topics. In this chapter, we explain our general approach.

## Consulting for recyclability

The role of Landbell Group as an extended producer responsibility (EPR) service provider has changed in recent years.

With the development of our consulting expertise and the significant political pressure on manufacturers for improving recyclability, packaging developers often involve us in the early product design stage to discuss upcoming legal frameworks for certain materials, their recyclability or the incorporation of recycled materials into their products.

We see it as our responsibility as consultants to look at the market and identify the best starting points for improving the circularity of products. This is why we happily share our knowledge and, if feasible, seek partners from our network to test technological variations in pilot projects.

## Certification for recyclability

To create a harmonised certification for the recyclability of packaging on a national and European level, Landbell Group joined the innoCErt project, which is funded by the [German Federal Office for Food and Agriculture](#).

The Group leads the operational part of the project, which encompasses trials and analysis of post-consumer packaging waste in Germany – to create practical and innovative solutions for the avoidance, reduction and recycling of plastic packaging.

The focus is on qualitative and quantitative waste flow analysis and identification of the recovery routes for different packaging waste streams and individual packaging types.

This work will contribute to a harmonised assessment method and certification, which can be used to incentivise producers to improve the ecodesign of their packaging.

## Improving secondary raw materials quality

Sometimes the steps that need to be taken to improve circular products are so easy it is surprising that nobody else seems to think of them. We do.

In Germany, Landbell Group has the largest market share of recovered paper among German producer responsibility organisations (PROs). We move around 180,000 tonnes annually, and the volume is growing.

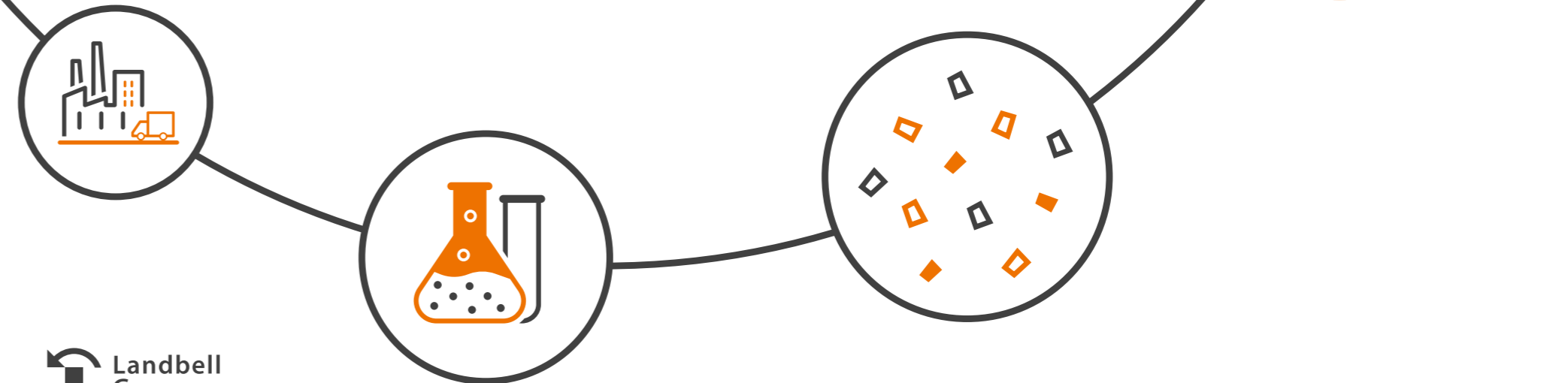
For several years now, we have been marketing recovered paper in Germany directly to paper merchants and paper mills, thus closing the recycling loop ourselves.

If this material were pre-sorted into rejects and paper fit for de-inking, paper mills could produce higher quality paper pulp and, for example, increase the proportion of secondary fibre in the virgin paper.

The Group is currently implementing this sorting process together with service providers. We also want to export this idea to other markets.

In addition, we facilitate dialogue between manufacturers of composite packaging and, for example, the paper industry. Paper is increasingly used in packaging, as it appears 'eco', but is, in fact, lined with a plastic layer as a barrier. This significantly deteriorates the quality of the recovered paper.

The steep rise in the use of composite materials also needs to be addressed from a circular economy perspective, as their limited recyclability poses a significant problem. The Group brings this holistic approach to the discussion table when the key product attributes that should be improved are identified.



**Building up technology**

The biggest challenge of all is to find truly circular solutions for the large mass of composite plastics flooding the globe.

With composites made of petrochemicals, mechanical recycling in its current form results in predominantly inferior material. Most of all, the secondary raw materials obtained cannot be used for food packaging.

Chemical recycling can be a solution.

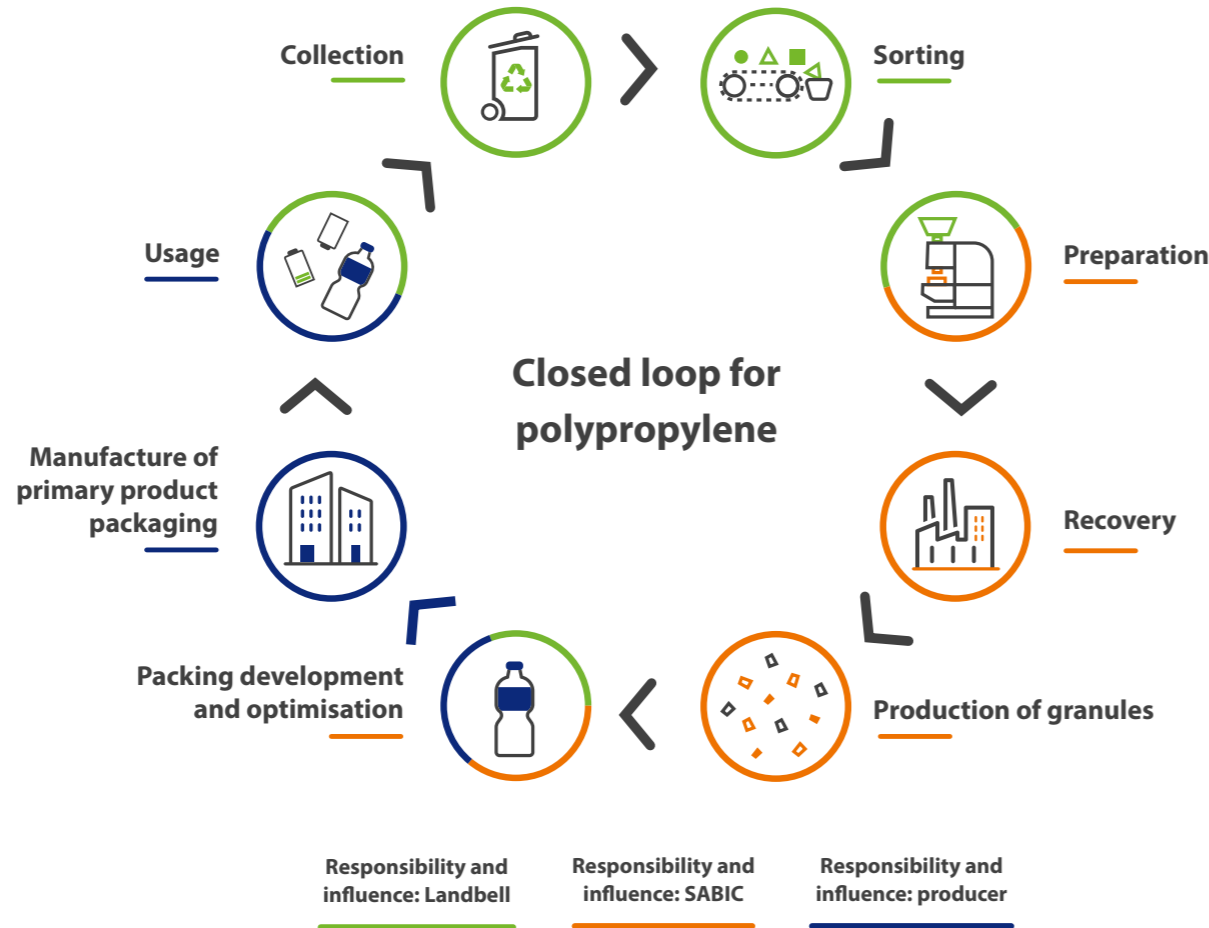
In 2020, Landbell Group initiated a cooperation with the chemical industry to close the loop for hard-to-recycle plastic packaging through chemical recycling.

The collaboration with the petrochemical company [SABIC](#) became the first partnership of its kind and was underlined by a pilot project with our joint customer Mars.

The Group has mixed plastic packaging waste, which meets SABIC's technical specifications, sorted out and delivered to SABIC. Through a pyrolysis process, it is recycled at a molecular level, to finally produce [certified circular polypropylene \(PP\)](#), which meets the hygiene standards even for food packaging. Mars uses recycled material in the packaging of its snack bar brand KIND®.

It is our goal to scale up and organise this process in such a way that our customers gain access to the secondary raw materials derived from the packaging they brought onto the market, creating a closed loop for PP.

**Closing the loop for hard-to-recycle plastic packaging**



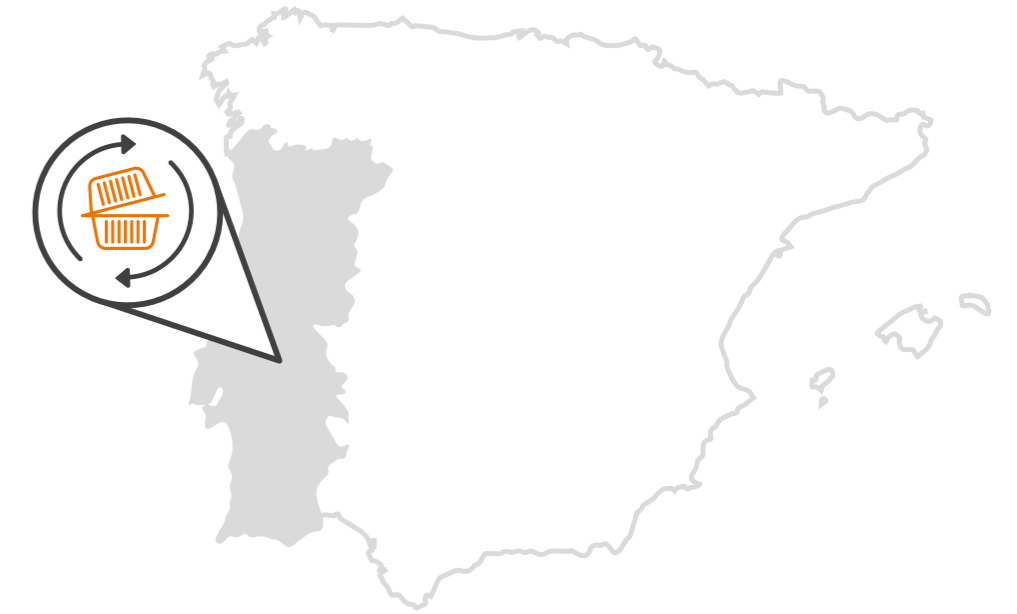
**Circular economy synergies**

**Source One GmbH joins Landbell Group**

At the beginning of 2023, Landbell Group acquired a 25.1 percent share in [Source One GmbH](#).

Source One advises and supports manufacturers with their global procurement and collateralisation of secondary raw materials.

The focus of our future joint activities is to return post-consumer waste, which is difficult to recycle, to the recycling process with the aid of innovative technologies and to expand the corresponding global infrastructure.



**Promoting tray-to-tray recycling in Portugal**

Landbell Group is the main shareholder of the Portuguese packaging scheme [Novo Verde](#) which is promoting and validating an innovative solution to segregate and recycle post-consumer PET trays through an advanced mechanical recycling process.

Instead of being incinerated (as they currently are), this R&D project will make it possible for recycled PET trays to be used in the production of new trays.

# Our supply chain.

Landbell Group works with a complex global supply chain in the transport and waste management sectors. Around 80 percent of our sales revenues go into these supply chains, and almost half of it into the management of packaging waste alone.

This chapter describes these supply chains, relevant material flows and how we set up our supplier management to reduce risks. This is particularly necessary as we are challenged to control the downstream fractions of our Tier 1 or Tier 2 recycling service providers.

The Group acts as a consultancy and an organiser of services. We contract physical removal and disposal with our international network of waste management industry suppliers, particularly transport companies, as well as waste sorting and recycling facilities.

With this well-established and controlled supply chain, we can support customers wherever they need us and expand the global waste infrastructure. This is one of our unique selling points.

## Structure

Landbell Group's global supply chain spans five continents with more than 1,900 suppliers. While our extensive supplier network provides us with the flexibility to adapt to customer requirements quickly, our operations are particularly active in Europe.

We work closely with our direct service providers and monitor and contractually require them to follow our standards or equivalent recognised industry standards.

Until now, we have been active mainly in countries and operational contexts where compliance with legal frameworks can be relied upon.

But the Group is growing, and we want to make sure that we can uphold and provide sustainable purchasing practices wherever our customers want us to serve them in the future.

## Restructuring

This is one of the reasons why we are restructuring our purchasing. In April 2022, the function of Chief Procurement Officer (CPO) was created. The CPO is also a member of the Global Leadership Team (GLT) that governs our company and integrates the purchasing structures of the Group.

As a first step, our integrated purchasing management system is being harmonised within the organisation where purchasing rules are directly defined in the regulations, for example, for packaging waste related activities in Germany.

The focus of this management system is our direct procurement (recycling and transport services) and is progressing within the group.

## Due diligence

One major field of work is the improvement of our group-wide approach to due diligence in our supply chains.

We are taking steps in this direction to ensure compliance with recent and upcoming regulatory requirements, including the German [Supply Chain Law \(LkSG\)](#) and the European [Corporate Sustainability Reporting Directive \(CSRD\)](#).

We perceive this effort as a relevant contribution to help our customers and communities reduce environmental and human rights risks.

In the short term, our focus will be to strengthen our due diligence via the creation of an enhanced Group Vendor Audit Policy and Guidelines, and the consolidation of a Group Duty of Care document for suppliers, which will extend social and environmental verification beyond legal requirements.

We expect to be able to systematise supplier assessment that comprehensively looks at social and environmental risks in 2024. The risk analysis that will be linked to the supplier assessment will mainly determine which suppliers we will audit in the future, and how our audits will be enhanced, if necessary.

## Processes

We ensure the quality and reliability of our suppliers through a series of measures that include thorough benchmarking and tender processes, as well as solid contractual conditions. Our obligation is to ensure that waste is managed in strict accordance with environmental legislation and high social standards.

All suppliers that fall under direct procurement (recycling and transport services) are bound by our General Terms and Conditions. Suppliers exceeding a certain threshold sign a more demanding service level agreement (SLA). Besides other labour-related issues, suppliers are requested to commit to ensuring the eradication of forced labour and modern slavery.

Particularly strict requirements apply for waste electrical and electronic equipment (WEEE) and batteries.

Suppliers who sign the SLA are contractually obliged to comply with our Technical and Management Requirements when we estimate legal requirements not to be sufficiently clear.

The requirements deal with multiple sustainability issues, from the treatment of materials of concern to environmental, health and safety issues, and from labour rights to risk assessment in the contractors' supply chain. Comprehensive social and environmental issues are covered, which go beyond legal conformity.

## Diverse markets

The waste processing market is still under development in many areas, while in others it is subject to economic or investment restrictions that may bind our selection choices.

For example, regional monopolies or market dominance exist in several regions where we operate. This is why, in general, and in these regions in particular, cooperation with our customers and suppliers enables us to achieve transparency in the supply chain.

Never compromising on our duties, we promote the step-by-step development of best practices in the sector and endeavour to lead the way.

Our goal is to screen all suppliers for social and ecological criteria. Landbell Group is currently setting up a digital sustainability management system where the results from the screenings will be compiled.

Starting next year, the Group will be able to report the percentage of services provided by suppliers (based on recycled volumes of WEEE and batteries) and the percentage of suppliers (based on the total number of suppliers for WEEE and batteries) that have been screened.

## Working together

Sometimes, it is not possible to take the right steps alone. For example, in Germany, we have a joint collection system for packaging and any changes would require the consent of all partners involved. We are striving to take the lead and integrate such specifications and, with the goodwill of all parties, we will achieve our goal.

In 2022, the Group carried out 60 audits in 22 countries, raising and following up more than 380 corrective actions. We had only two critical issues of non-compliance with regulations, the majority were minor ones.

Our procurement managers play an important role in supplier monitoring by evaluating the sustainability and compliance risks of the suppliers that they work with. To be able to assess such risks, they receive training, including on awareness of forced labour and human trafficking.

## Waste streams

While all waste causes emissions and contributes to the degradation of the environment, all waste streams are not equally risky in terms of environmental or human rights violations.

International legislation has also begun to strictly regulate the import and export of waste in recent years.

The export of hazardous waste for disposal, such as certain components of batteries and waste electrical and electronic equipment (WEEE), is banned under the [Basel Convention](#), an international treaty that aims to ensure that hazardous waste is managed and disposed of in an environmentally sound manner, in the country where it was generated.

There are additional export restrictions that apply to plastics: from 2021, the export of plastic waste to non-OECD countries has been banned, except for certain pre-approved operations.

We are aware of how difficult it is to control illegal waste transboundary shipments, so we do not take applicable legal provisions alone as a guarantee of supply chain compliance.

This is why we work on the traceability of our operations, from the point of waste collection to its destination for recovery or disposal. We make sure that our suppliers are reliable and contractually obliged to control their supply chains.

## Examples of traceability information

	The waste streams collected		Where they were collected
	The recycling rates achieved per tonne of waste category		How they were transported to recycling facilities
	The waste categories that arrived in the recycling facilities and their weight		The confirmation from the recycler that the waste delivered was treated according to the agreed process and applicable legal requirements
	The names of relevant downstream vendors that received fractions of special concern		

### Sustainability risks connected to the treatment of WEEE, batteries and packaging

The following general overview focuses on the markets where our largest sales are located.

#### Waste electrical & electronic equipment (WEEE)

WEEE (or e-waste) is usually processed close to where it is collected because the volumes are relatively high and there is a dense network of recycling sites.

Materials of concern such as ozone-depleting substances in old refrigerators are given special attention within the technical requirements.

Metal fractions, including copper, steel and aluminium flow straight back into the global supply chain.

For hard plastics and plastic housings, recycling varies by country. Our biggest market is Europe.

## Packaging waste

Packaging waste mainly consists of metals, plastic, paper, cardboard and glass. The handling and management of packaging waste can vary slightly according to local regulations. Our biggest market by far is Germany.

For **plastic and glass**, we have contracts with sorting plants that are responsible for marketing the materials. While there are no risks attached to glass, the treatment and labelling of plastics are of paramount importance due to the immense quantities around the world. Environmental and human rights risks are related to illegal export, which is why we screen our suppliers carefully.

For **recovered paper**, we have a market share of around 20 percent in Germany, where we are one of the largest suppliers. Paper is the only material that we currently trade ourselves. In Germany and Portugal, we collect it from customers or sorting plants and supply paper mills directly. The paper supply chain is simple, with no specific risks attached.

## Waste batteries and accumulators (WBA)

WBA is classified into the following three categories by the [European Battery Directive](#):

- **Automotive** refers to batteries used as a source of ignition power or lighting power in vehicles
- **Industrial** refers to batteries that are a source of power to drive or propel electric cars. They are also used in heavy industry or professional applications, and
- **Portable** refers to batteries which are sealed and hand-carried and commonly used in household electronic appliances

Landbell Group organises the collection of all three categories of WBA. Portable batteries are the most dominant fraction (about 90 percent) and the remainder is mostly made up of automotive batteries.

Of the total volumes of portable batteries currently collected, the share of alkaline batteries is on average 75 percent with small deviations between different countries where our producer responsibility organisations (PROs) are based.

The standard processes in WBA management are collection, transportation, sorting into different chemistries and treatment for material recovery.

Sorting is a fundamental stage in handling WBA and can be done locally at collection sites or dedicated sorting sites before delivery to the final treatment facility. Some treatment sites offer sorting services and, therefore, the WBA can be delivered to the sites as mixed WBA.

Unlike WEEE, where solutions are mostly local, treatment solutions for WBA are concentrated in specific countries in Europe and therefore transboundary movement of WBA is common. Europe has sufficient end-to-end solutions for alkaline batteries.

Management of waste lithium-ion batteries must address fire hazard risk, as they can easily attain a critical self-heating state during storage, transportation and treatment.

In Europe, our service providers have certified personnel equipped with safety measures to avoid accidents. There are also legally binding technical guidelines which are implemented at country or European level to mitigate potential hazards.

# Our footprint.

Our sustainability initiative in large part is driven by the recognition of the direct and indirect environmental impacts related to our corporate activities. Therefore, we are looking to address this issue systematically by regularly measuring our corporate footprint and implementing appropriate measures to reduce negative impacts.

Landbell Group entities have 19 offices globally. Some of our locations have environmental or energy management systems certified to ISO 9001, ISO 14001 and ISO 45001. In these locations, we already evaluate our environmental impacts yearly and improve them on an ongoing basis.

## Energy

In 2022, we started to track energy consumption and emissions in all our locations. Our focus for the first year has been to create a baseline for our footprint. This allows us to identify where our impacts are and develop detailed climate action strategies accordingly.

Our total energy consumption within the Group entities in 2022 was 841.93 megawatt hours (MWh). Given the service-based business model we have, the energy consumption is largely in our offices in the form of electricity (266.14 MWh), as well as energy for heating and cooling purposes (196.18 MWh).

In addition, significant energy consumption (379.61 MWh) has resulted from mobile combustion, which includes fuels used by the fleet of cars owned or controlled by Landbell Group entities. We are currently not tracking the energy consumption outside of the organisation.

We mainly purchase power from local grids, so the source of our energy depends in large part on the local electricity mix. In some of our locations, we cannot choose the electricity provided because it is included in the leasing cost.

Nevertheless, we plan to continue monitoring our energy consumption across all sites, accurately identify the energy source and implement measures to reduce consumption, as well as transition to renewable sources where possible.

## Emissions

Along with our energy consumption, we started tracking our direct (Scope 1) and indirect (Scope 2) greenhouse gas (GHG) emissions in 2022. We are in the process of setting up a system to collect emissions data from our suppliers (Scope 3).

Next year, we plan to start the collection of Scope 3 emissions data and work on reduction targets and related programmes for our Scope 1 and Scope 2 emissions.

### GHG Emissions (tonnes CO<sub>2</sub> equivalent)

	Emission source	2022
<b>Scope 1</b>	Company vehicles	92.35
<b>Scope 2</b>	Energy Consumption	115.48
<b>Total</b>		207.83

Note: Gases include CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, no biogenic emissions; calculated using the [Codio Impact platform](#) and its GHG accounting and reporting procedure which is based on the country-level emission factors and international GHG Protocol methodology of the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD).

# Outlook.

This is just the beginning of our sustainability journey, and there is still much work to be done. In the coming years, we are committed to further enhancing our sustainability efforts.

One of our main goals is to improve waste and material flow transparency across our value chain. By enhancing transparency and traceability, we will be able to contribute to circularity across product lifecycles and ensure proper end-of-life management of critical, as well as hazardous material fractions.

By measuring our energy consumption and emissions, we are taking a proactive approach to address our corporate footprint. Moving forward, we will develop our climate action strategy, set ambitious targets and engage in collaborative initiatives with our stakeholders.

Through the initial data collection and analysis, we have gained a clearer understanding of our energy consumption patterns and the associated greenhouse gas emissions. This newfound knowledge empowers us

to make informed decisions regarding our climate action strategies. By implementing innovative technologies and optimising processes, we are committed to minimising our environmental impact while maximising our operational efficiency.

We are collaborating closely with our customers, as well as our suppliers to promote sustainable practices. We will expand the evaluation of our suppliers' environmental and socioeconomic practices and work together to improve the overall value chain performance. By promoting sustainability across our entire value chain, we can collectively reduce our impacts.

We firmly believe that sustainability is a collective effort. Therefore, we will continue to engage with industry stakeholders and communities to foster collaboration and knowledge sharing. By participating in multi-stakeholder initiatives, we can collectively drive systemic change, share best practices and accelerate progress.

And, finally, we will prioritise employee engagement and training programmes to educate our workforce about the socio-economic and environmental aspects of sustainable development. By fostering awareness and a culture of corporate responsibility, we aim to drive behavioural changes and further enhance our overall sustainability performance.

As we embark on these new endeavours, we remain dedicated to transparency and accountability. We will continue to measure and track our progress, regularly updating our stakeholders on the outcomes of our sustainability programmes. Together with our partners, employees and customers, we are committed to creating a more sustainable future for generations to come.



# Appendix.

## Entities included

Landbell Group's sustainability report perimeter for the financial year 2022 is largely aligned with the Group's consolidated financial statements.

Some minor deviations shall however be noted, such as subholdings or minor service affiliates which have not been included as they have no substantial activity, impact or contact with stakeholders.

From the ownership point of view, affiliates in which Landbell Group has only minority shareholding or control are either not included in the sustainability report or included on a voluntary basis following a decision of the highest local body.

Landbell GFS India Private Limited, a joint venture only recently created and not yet included in the group financial statements, and ERP Portugal Associação Gestora de Resíduos, an association independent from Landbell Group, but sharing similar activities and processes, have voluntarily taken part in the sustainability reporting process and are included.

When included in this report, entities with minor shareholdings have been treated the same way as fully-owned or long-owned companies. Entities were involved equally in material or general disclosures. Landbell Group has not included mergers, acquisitions and disposal of entities or parts of entities which happened in 2022.



Entity name	Country	Ownership
Consorzio ERP Italia	Italy	Majority Shareholding
DS Entsorgung u. DL-GmbH	Germany	Fully Owned
ERP Denmark ApS	Denmark	Fully Owned
ERP Deutschland GmbH	Germany	Fully Owned
ERP Espana SL	Spain	Fully Owned
ERP Finland Services Oy	Finland	Fully Owned
ERP Ireland Ltd. (WEEE)	Ireland	Fully Owned
ERP Italia Servizi SRL	Italy	Fully Owned
ERP Norway AS	Norway	Fully Owned
ERP UK Limited	UK	Fully Owned
ERP WEEE Polska SA	Poland	Fully Owned
ERP Austria GmbH	Austria	Fully Owned
ERP Brazil Serviços de Gestão de Resíduos	Brazil	Fully Owned
ERP Portugal Associação Gestora de Resíduos	Portugal	Independent Association
ERP RAEE SL	Spain	Fully Owned
H2 Compliance Inc.	USA	Fully Owned
HH Compliance Limited	Ireland	Fully Owned
Integral Waste Solutions SL	Spain	Fully Owned
Landbell AG	Germany	Fully Owned
Landbell APAC Pte. Ltd.	Singapore	Fully Owned
Landbell GFS India Private Limited	India	Joint Venture
Landbell GmbH	Germany	Fully Owned
Landbell Software SA	Portugal	Fully Owned
Novo Verde S.A.	Portugal	Majority Shareholding
topengi sp. z o.o.	Poland	Fully Owned
Waste Trends Lda.	Portugal	Fully Owned

## Memberships of Landbell Group entities in consortia, associations or other organisations

Entity name	Consortia, associations or other organisations
<b>ERP Austria</b>	Österreichischer Wasser- und Abfallwirtschaftsverband Verband Österreichischer Entsorgungsbetriebe WKO Fachverband Entsorgungs- u. Ressourcenmanagement Verband Abfallberatung Österreich Deutsche Handelskammer in Österreich
<b>ERP Denmark</b>	Dansk Industri Dansk Erhverv
<b>ERP Finland</b>	Tuottajayhteisöjen neuvottelukunta Suomen Uusioraaka-aineliitto Finnish Business Society
<b>Landbell AG</b>	Arbeitsgemeinschaft Verpackung und Umwelt e.V. Bundesverband der Deutschen Entsorgungs-, Wasser- und Rohstoffwirtschaft e.V. Verband kommunaler Abfallwirtschaft und Stadtreinigung im Verband kommunale Markenverband Bundesverband Sekundärrohstoffe und Entsorgung Gemeinsame Stelle Prevent Waste Alliance (Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH) Batterie zurück Kommunikation nach §18 BATT Gesetz Mülltrennung wirkt, Initiative zur Reduktion des Verpackungsmüll RETech-German Recycling Technologies and Waste Management Partnership e.V
<b>ERP Ireland</b>	CIRCULÉIRE Chambers Ireland Public Relations Institute of Ireland Hardware Association Ireland
<b>H2 Compliance (Ireland)</b>	Only Representative Organisation REACHReady
<b>H2 Compliance (USA)</b>	Society of Hazard Communication Product Stewardship Society Product Stewardship Institute

Entity name	Consortia, associations or other organisations
<b>ERP Norway</b>	Næringslivets hovedorganisasjon Avfall Norge LOOP Norsk Forening for farlig avfall Ombrukt.no Hold Norge Rent Grøntpunkt Norge
<b>ERP UK</b>	Portable Batteries Stakeholder Group Joint Trades Association WEEE Schemes Forum Packaging Schemes Forum Industry Council for Electronic Equipment Recycling BSI GEL 111 Electrotechnical Environment Committee All-Party Parliamentary Sustainable Resource Group
<b>Consorzio ERP Italia</b>	Associazione Italia Commercio Estero Confindustria Milano Confindustria Alto Milanese Confindustria Bergamo FederlegnoArredo and all the federated associations Politecnico di Milano SISTEMI PER PRODURRE e tutte le associazioni dell'Unione Unione industriali Pordenone
<b>Novo Verde</b>	Associação das Entidades Gestoras de Fluxos Específicos de Resíduos SMART WASTE PORTUGAL - Business Development Network (SWP) Pacto Português para os Plásticos Better Plastics: Plastics in a Circular Economy Plataforma Vidro+
<b>ERP Portugal</b>	4Packaging - Associação para a Cooperação Estratégica em Embalagens ASSOCIAÇÃO DAS ENTIDADES GESTORAS DE FLUXOS ESPECÍFICOS DE RESÍDUOS SMART WASTE PORTUGAL



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<b>Statement of Use</b>	Landbell Group has reported the information cited in this GRI content index for the period 1.1.2022 to 31.12.2022 with reference to the GRI Standards.
<b>GRI 1 used</b>	GRI 1: Foundation 2021

## Acknowledgement

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triple innova is an official training partner of the Global Reporting Initiative (GRI) and has extensive expertise in the application of the GRI Standards and the development of sustainability strategies.



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