

# SUSTAINABILITY REPORT



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☎ + 30 231 072 8000

✉ info@melpaper.com

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2022

Advised by



**NET ZERO ANALYTICS**  
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## Message from the Managing Director

(GRI 2-22)

The issuance of the Sustainability Report for 2022 comes in the end of another challenging year. During 2022 MEL coped successfully with the turbulence in the market after the end of the pandemic, together with energy costs remaining high. In order to meet with the new difficulties, MEL managed to bring its energy consumption down, through new investments and productions' fine tuning. This effort is still ongoing. At the same time we constantly supported the local society through various actions. Moreover, by recycling and reusing more than 120,000 tons of paper annually and strengthening the circular economy model, MEL unquestionably ensures environmental balance and sustainability. In this context, we continue to implement practices based on the principles of circular economy and reuse of natural resources, in order to continuously reduce the environmental burden, focusing on reducing the use of fossil fuels consumed in the production processes and emphasizing on the utilization of recyclable materials and the eco-design of our products.

MEL is pleased to publish an ambitious sustainability plan for the future and communicate our long-term sustainability goals described in this Report. The report presents the main points of the mission and objectives and sets out the priorities of our focus on measurable goals that will be key in future developments. The points mentioned are of great importance to our industry and society in general and we hope that they contribute to the legacy of ecological heritage. The aim of this report is to capture the value that our group creates for our people, the market, the wider society and the natural environment. At the same time, we aim to construct a business model with socially and environmentally sustainable economic activities that will support sustainable development, highlighting the contribution of the industry to the wider society. The report presents the corporate responsibility principles applied by MEL, in detail with all the actions and goals set for the coming years.

Undoubtedly, in an environment with new uncertainties arising due to geopolitical unrest, the high cost of fuel and the business challenges brought by the sharp increase in demand compared to the previous two years seem to significantly impact our operations. Our primary goal is to bring all energy costs down in the most sustainable way. Similarly, we aim to overcome to the extent possible, the problems we see internationally, maintaining the level of service and experience we want for our customers. Finally, we will continue to be equally committed to our long-term plan and vision for the next era of MEL, which has already begun.

**Dr. Dimitris Theocharis**  
Managing Director

MEL S.S.A.







## About this Sustainability Report

(GRI 2-2, 2-3, 2-4, 2-5)

This Sustainability Report marks our second concerted effort to present our integrated strategy and annual actions for sustainable development. It details our actions and initiatives from 1 January 2022 to 31 December 2022, aligned with our financial reporting period. and includes information solely regarding MEL S.S.A..

Our report aims to provide comprehensive and detailed information to all stakeholders regarding the sustainability practices we adopt and our performance in contributing to sustainable development. It was prepared in accordance with the Global Reporting Initiative (GRI) standards (2021) and, additionally, we also considered the 17 Sustainable Development Goals (UN SDGs).

MEL's Sustainability Report is available to all interested parties on our official website <https://www.melpaper.com/en/sustainability-report>. This provides easy access to important information about our company. For any question or clarification regarding the report, please contact MEL's responsible representative, Ms. Anastasia Dimitraki via e-mail at [adimitraki@melpaper.com](mailto:adimitraki@melpaper.com) or send a letter to our facilities in Kato Gefyra, 57011, Thessaloniki, Greece.

Compared to the previous reporting period there have been no restatements of information in this report. Moreover, MEL did not seek external assurance for this report.

# 1. Our Company

(GRI 2-1, 2-6)



MEL, with the distinctive name of MEL-MACEDONIAN PAPER MILLS S.S.A., is an exclusive coated cardboard producer in Greece and ranks among the largest in Southeastern Europe, North Africa, and the Middle East. Our activities include the paper recycling sector, and the cardboard manufacturing and processing sector, where we excel in many aspects.

At the core of our business is the cardboard trade, together with the strategic collection, supply, and processing of used paper and related materials. MEL prides itself on its specialist expertise in the design, production, and marketing of recycled packaging paper, which is mainly derived from recycled paper as a raw material. Since 2012, MEL has been an integral part of the Pak Group, a colossal conglomerate that is active in various industries, such as food, packaging, feed, fertilizer, and real estate.

Our commitment extends beyond business boundaries. MEL aspires to be a leading force in the European paper industry, with a particular focus on southeastern Europe. Driven by a vision of sustainable development, we continuously invest in our production facilities to aim for an annual paperboard production of approximately 120,000 tons. A significant portion of this production is shipped to countries around the world, underscoring our global impact.

During the period from 2017 to 2022, MEL implemented an extensive investment plan aimed at increasing production capacity, reducing operating costs and improving its environmental footprint. The successful completion of the first phase confirms our commitment, while the ongoing second phase, due to be completed by 2025, further underlines our strategic vision. Through these strategic investments, MEL aims to:

- Increase production capacity,
- Significantly reduce energy costs,
- Improve product quality,
- Maintain profitability following our business plan.

Beyond financial pursuits, our firm commitment to sustainability is evident in our conscientious initiatives, which include recycling approximately 50% of the country's collected paper, seamlessly harmonizing with advanced and environmentally friendly production processes that actively contribute to cultivating a "green" ecological footprint.



## 1.1 Company Overview

(GRI 2-6)

Founded on the principles of innovation and excellence, MEL has evolved into a dynamic entity, playing a significant role in our industry. Our journey has been marked by continuous growth, driven by our dedication to delivering quality and value to our clients. We pride ourselves on our agile and forward-thinking approach, which enables us to not only anticipate market trends but also set new standards in sustainable business practices.

At the core of our operations lies our commitment to sustainability. This commitment transcends all aspects of our business, from our production processes to our corporate governance. We have integrated sustainable practices into our business model, ensuring that our operations are not only efficient but also environmentally friendly and socially responsible.

Below is a brief overview of our company:

### Facility and Land Ownership:

- MEL operates a cutting-edge plant on 50,000 square meters of its privately owned land, spanning a total area of 230,000 square meters. Our corporate headquarters are situated at VI.PA.THE. Kato Gefyra, Thessaloniki, Greece. The company's administrative offices and production facilities are strategically positioned at the 22nd kilometer of the Thessaloniki-Edessa National Road, ensuring convenient access from various points within Thessaloniki, including the Macedonia International Airport.

### Workforce:

- The company is supported by a skilled workforce of professionals.

### Production Capacity:

- MEL's advanced facility has an annual production capacity exceeding 120,000 tons of coated cartonboard.

### Product Diversity:

- MEL's advanced facility has an annual production capacity exceeding 120,000 tons of coated cartonboard.

### Global Market Presence:

- A significant majority (56%) of MEL's production is exported to over 30 countries, reflecting its robust global market presence.

### Domestic Distribution:

- The remaining 44% of the production is distributed within the Greek market, contributing to the local economy and promoting sustainability on a regional level.

### Financial Performance (2022):

- In 2022, MEL achieved a remarkable annual turnover of €97,979,856, which is the direct economic value generated by revenue, highlighting its financial stability and success.

## 1.2 The company's sector of activity and its contribution to the economy

### GRI 201-1

MEL has continuously adapted to the evolving market demands and environmental considerations, ensuring that our products and services remain at the forefront of the industry. We take pride in our ability to balance economic success with environmental stewardship, making significant strides in sustainable practices while driving industry growth.

In 2022, a discernible upswing in product demand was observed both domestically and internationally, particularly during the initial half of the year. This heightened demand created an increased requirement for packaging materials. Furthermore, there was a notable market shift towards environmentally sustainable packaging alternatives, aligning with a growing preference for options that minimize environmental impact. This transition significantly contributed to the amplified demand for cardboard as a preferred packaging material.

The upsurge in global demand, coupled with sales in high purchasing power markets and an uptick in commercial activities, alongside substantial energy cost escalations for the second consecutive year, resulted in upward price adjustments for the company's products. Consequently, the company witnessed a substantial 45.22% increase in turnover, attaining noteworthy profitability in the fiscal year 2022.

The following tables include detailed financial data regarding our performance in 2022.

Key Performance Indicators	2021	2022	Difference
Total Turnover (€)	67,479,824	97,979,856	+45.22%
Cost of Goods Sold (€)	58,124,843	70,293,152	+20.97%
Gross profit (€)	9,354,981	27,686,704	+195.96%
EBITDA (€)	5,169,870	21,767,285	+320.7%
Total Assets (€)	120,780,967	135,206,127	+11.94%
Net Salable Production (t)	115,500	103,500	-10%
Total investments in CSR initiatives (€)	23,806.97	28,079.20	+18%

	2021	2022
Total Revenues (€)	67,479,824	97,979,856
<b>Direct Economic Value Distributed</b>		
Key Performance Indicators	2021	2022
Operating Costs (€)	7,166,132	10,499,692
Employee Wage And Benefits (€)	8,805,576	9,706,693
Financial Expenses (€)	2,229,371	2,389,067
Income Tax (€)	1,053,517	4,364,700
Total Investments In CSR Initiatives (€)	23,806.97	28,079.20
<b>Total Direct Economic Value Distributed (€)</b>	<b>19,278,402.97</b>	<b>26,988,231.20</b>
<b>Economic Value Retained (€)</b>	<b>48,201,421.03</b>	<b>70,991,624.80</b>





### 1.3 History

In terms of our historical journey, the origins of MEL date back to 1964 when Georgios Ladopoulos founded the company in Patras, Greece. A pivotal moment occurred in 1967 when the company strategically relocated its headquarters to Northern Greece, representing a significant milestone in its corporate history. This relocation laid the foundation for sustained growth and expansion in a more conducive environment.

In 1984, MEL changed ownership and fell under the purview of the Business Reconstruction Organization (OAE). This transition ushered in new opportunities and strategic guidance for the company. Subsequently, in 1998, MEL reached a crucial juncture as it completed its privatization process. This transformative phase provided the company with enhanced operational flexibility and autonomy, paving the way for future endeavors.

Since 2012, MEL has operated as an integral part of the esteemed PAK GROUP B.V., which is the company's sole shareholder. This strategic alliance has significantly strengthened MEL's market position, fostering growth and promoting synergies.

Presently, MEL stands as the foremost leader in the recycled cardboard industry in Greece and the broader Balkans region. It holds the distinction of being the exclusive industrial unit in Greece dedicated to the production of recycled cardboard, with an impressive annual output of 120,000 tons of coated cardboard. Furthermore, its influence spans Europe, North Africa, and the Middle East, solidifying its reputation as a key player in the industry.

### 1.4 Our philosophy

We emphasize our foundational belief in quality and consistency across all aspects of our operations. This philosophy extends not only to our services but also to our relationships with employees and partners, and in our approach to corporate social responsibility. Every interaction and workplace relationship within MEL is governed by profound respect and reciprocity.

MEL's vision is driven by the principles of the circular economy, focusing on utilizing every element of the supply chain to achieve sustainable development. We are delivering products and services that adhere to the highest standards of resource efficiency and environmental sensitivity.

Our commitment to ecological and social awareness is evident in our dedication to offering optimal solutions, conserving resources, and fostering environmental mindfulness. Recognizing the value of secondary raw materials and their full utilization, we not only enhance our energy efficiency but also create highly productive job opportunities and improve the quality of life in the communities we serve. As part of our corporate social responsibility, we actively engage in educating the community about recycling, underlining our commitment to environmental stewardship and sustainability.

## 1.5 Pak Group

Established in 1923, the Pak Group is a renowned conglomerate, currently encompassing 19 distinct companies with expertise in areas such as food, packaging, cartonboard manufacturing, feed, fertilizers and real estate. The Group boasts a total gross turnover exceeding \$500 million and proudly provides employment to approximately 1,650 professionals.

The origins of Pak Group trace back a century, to the establishment of the Mustafa Nevzat Pharmaceutical Laboratory in 1923. Dr. Engin Pak, the founder of the Pak Group, played a pivotal role in transitioning from laboratory-scale operations to industrial manufacturing in the 1950s. Throughout his extensive career, Dr. Pak successfully founded and expanded multiple companies with global operations. The enduring principles of high ethics and production standards instilled by Dr. Pak serve as a guiding force for the Group's enterprises today.

For more than five decades, the Pak Group has actively developed its various businesses and has successfully exported its brands to over 130 countries. Committed to adding value to the local economies in which its companies operate, the Pak Group is dedicated to a sustainable approach and upholds a commitment to high-quality production for a better future.

The Pak Group's diverse portfolio spans across different sectors, including the packaging industry with companies such as Kartonsan, Interimat, Dönkasan, Selka, and MEL; the food industry represented by As Gıda, Pak Gıda, Pak İhracat, Rompak, and Bellarise; the agricultural sector with Integro; the real estate industry through Ece Ticari Gayrimenkul; and holding companies such as Pak Holdings A.S., Pinat Gıda Sanayi ve Ticaret A.S., and Asil Holdings A.S.

More specifically for the packaging sector, Pak Group holds a significant stake in the industry, owning 75% of Kartonsan, which stands as Turkey's premier carton board producer, and 70% of Interimat, a leading name in flexible packaging production across Europe. A strategic expansion through acquiring MEL has elevated the Pak Group to the position of the fourth-largest carton board manufacturer in Europe. This expansion has boosted the group's annual production capabilities to an impressive 360,000 tons.



## 1.6 Our Products

At MEL, we prioritize not only the excellence of our products but also the safety of our customers, consistently integrating advanced safety measures into our offerings. Our diverse range of products is meticulously designed to cater to various market needs, each uniquely contributing to different applications:

- Duplex R Cartonboard: This product carries the esteemed “R” quality designation, featuring a sleek white exterior face and a subtle light gray interior face. The Duplex R is a robust cartonboard, ideal for general packaging needs. It has gained popularity for packaging a broad spectrum of European goods, reflecting its versatility and reliability.
- Triplex BR Cartonboard: Accounting for a significant 40% of our cartonboard production, the Triplex BR stands out with its pristine white surfaces on both sides, marked with the “BR” designation. This cartonboard is especially suited for food packaging, meeting high safety and quality standards. Its popularity soars in the realms of cosmetics and pharmaceuticals packaging, where high-specification and aesthetic appeal are paramount.
- Triplex R Kraft: The Triplex R Kraft, distinguished by its “R KRAFT” designation, is notable for its warm brown reverse side. This carton board has become a hallmark for food packaging, particularly favored in Western European markets. Its earthy brown hue not only adds a natural aesthetic but also aligns with contemporary packaging trends.
- Kraft-Kraft board: Crafted with precision at our state-of-the-art mill in Thessaloniki, Greece, this uncoated, double-sided kraft board represents a significant leap forward in MEL's product offerings. Our dedication to innovation and responding to market trends has led us to develop this unique kraft board, aligning with the increasing global demand for sustainable and high-quality kraft board solutions. The Kraft-Kraft board, featuring a uniform kraft texture on both sides, stands out with its eco-friendly design and natural look. Its robustness and thickness ensure that it meets the highest standards for visual clarity, brand representation, and functional performance, excelling in both processing efficiency and operational smoothness on production lines. Like all of MEL's products, the Kraft-Kraft board is fully recyclable, underscoring our commitment to environmental stewardship.

Our commitment to sustainability, quality, and customer safety stands at the forefront of our operations, ensuring that we continue to be a trusted name in the industry. Our dedication to innovation and excellence is reflected in every product we offer, solidifying our position as a leader in sustainable packaging solutions



## 1.7 International Certifications

(GRI 2-23)

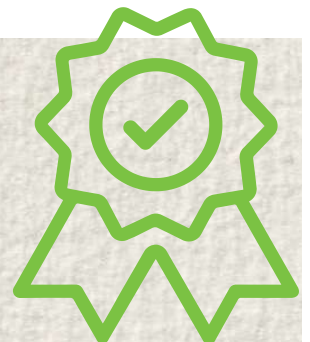
In order to ensure long-term sustainability, we recognize it is imperative to adhere to specific management disciplines. The International Organization for Standardization (ISO) has created Standards for Quality, Environment, and Safety, which provide methodologies for attaining sustainable success in the long run. These standards offer guidance on how businesses can effectively manage their operations to achieve financial, social, and environmental sustainability.

To demonstrate its commitment, MEL has obtained the following certifications:

- EN ISO 9001:2015 for the implementation of a Quality Management System for the Design, Production, and Sales of Carton Board (valid until 2024)
- EN ISO 14001:2015 for MEL's Environmental Management System (valid until 2024)
- EN ISO 45001:2018 for MEL's Occupational Health and Safety Management System (valid until 2024)
- EN ISO 50001:2018 for MEL's Energy Management System (valid until 2026)
- EN FSC-STD-40-004 (Version 3.1) for Chain of Custody (valid until 2027)
- EN FSC-STD-40-007 (Version 2.0) for Sourcing reclaimed material for use in FSC Product Groups or FSC Certified Projects (valid until 2027)
- EN FSC-STD-50-001 (Version 2.1) for the Design, Production, and Cardboard Trading (valid until 2027)

By obtaining the above international certifications, MEL showcases its commitment to sustainable business practices across multiple areas. These certifications demonstrate that MEL has established robust management systems, aligned with global standards, to ensure the quality of its products, the protection of the environment, the safety of its employees, and efficient energy use. The FSC certifications further validate MEL's dedication to responsible sourcing and promoting sustainable forest management.

This multitude of certifications reflects the company's strong commitment to long-term sustainability and it provides stakeholders with assurance that MEL adheres to rigorous management disciplines and prioritizes social, environmental, and financial sustainability. The certifications also contribute to the company's reputation as a responsible and environmentally conscious organization, enhancing its credibility and competitiveness in the marketplace.



## 1.8 Supplier Chain

(GRI 2-6)

We proudly highlight our extensive network of over 6,000 suppliers, whose diverse specializations are detailed elsewhere in the report. Alongside, we serve 240 esteemed customers, and our operations significantly contribute to human resources, environmental sustainability, local community development, and energy efficiency. MEL operates globally, having a strong presence in countries such as Greece, the United States, and various nations across Asia and Africa, fostering long-standing relationships in these regions.

Moreover, MEL collaborates with a range of business partners, including external legal advisors, consultancy firms, and security service providers. These partnerships enhance our operational efficiency and contribute to our robust business model. Our commitment to maintaining and nurturing these relationships reflects our dedication to excellence, underpinning our position as a leader in our industry. MEL's expansive network and collaboration with a broad spectrum of stakeholders underscore our commitment to sustainable growth and community engagement, solidifying our reputation as a company that values long-term partnerships and sustainable business practices.

Our diverse product range includes GD, GT, and UT. Our clients are both local and international, spanning a broad geographic spectrum. We have established strong customer relationships not only in Greece but also in numerous countries across the globe.

Our extensive customer base is spread across various regions, including Greece, Romania, Turkey, Italy, Egypt, Albania, Bosnia-Herzegovina, Hungary, Slovenia, Poland, Kosovo, Austria, Spain, France, the United Kingdom, Israel, Morocco, Cyprus, Serbia, Bulgaria, Algeria, North Macedonia, Sweden, Portugal, Germany, Tunisia, the United States, Croatia, and the Czech Republic.

This wide reach showcases MEL's ability to cater to diverse market needs and preferences, reflecting our commitment to delivering quality products and services. Our global presence is a testament to our adaptability and the trust we have built with our customers worldwide. As we continue to expand our market reach, we remain dedicated to sustaining these valuable relationships and exploring new opportunities, further solidifying our position as a key player in the industry with a strong and reliable supplier chain.

Our supplies fall into two main categories: primary raw materials, which predominantly consist of recyclable paper and secondary raw materials. The latter includes a variety of essentials like fuels, chemicals, electrical and mechanical equipment, health and safety gear, materials for final product packaging, and components for water, steam, air, and oil networks. Additionally, we also utilize a range of services, such as instrument calibration, waste management, and construction services.



For primary raw materials, the responsibility of ordering rests with the supply chain manager, who aligns these orders with our production program, subject to the top management’s approval. This streamlined and well-monitored system ensures efficiency and high standards in our supply chain, reflecting our commitment to sustainable and responsible sourcing practices. At MEL, we pride ourselves on maintaining a well-organized and efficient supply chain, which is crucial to our operational success and the quality of our products and services.

The distribution of MEL’s value chain is presented in sectors as follows:

Upstream	Downstream
Suppliers - Primary Raw Materials	Local Customers
Suppliers - Secondary Raw Material	International Customers
Human Resource	Waste Management Services
Security Service Providers	Local Community
External Legal Advisors	
Consultancy Firms	
Instrument Calibration	
Construction Services	
Banks	
Suppliers - Equipment and Spare Parts	

## 1.9 Risk Management

Our risk management involves various financial risks that our company encounters, including market risk, credit risk, and liquidity risk, particularly those arising from fluctuations in exchange and interest rates. Our overarching goal is to effectively manage these risks to ensure they have minimal impact on our financial stability and performance.

Our Financial Management Department plays a pivotal role in this endeavor. This team, renowned for its expertise and diligence, not only monitors these risks but also provides strategic advisory services. Their responsibilities extend to coordinating MEL’s engagement with both domestic and international financial markets, ensuring that we are well-positioned to respond to financial changes and opportunities.

A key aspect of our approach is the careful management of financial risks. To this end, our Financial Management Division operates with a strict policy against speculative transactions and activities unrelated to MEL’s core commercial, investment, or borrowing functions. This disciplined approach underscores our commitment to maintaining financial integrity and stability.

MEL’s proactive risk management strategies are an integral part of our sustainable business model. By meticulously managing financial risks and avoiding unnecessary speculative activities, we not only safeguard our financial health but also reinforce our reputation as a responsible and forward-thinking company. This commitment to strategic risk management is fundamental in our journey toward sustained growth and long-term success.

## 1.10 MEL's Investments

(GRI 203-1)

At MEL, we understand that responsible and sustainable investments are crucial not only for our growth but also for the well-being of our planet and future generations. A concise summary of the key projects is presented below:

### **Strategic Infrastructure Development and Environmental Initiatives:**

- In 2022, we achieved significant milestones with the completion of the vacuum pump system in the dry section of production and the gas fuel drying system for the paperboard coating procedure. These advancements demonstrate our commitment to technological innovation and environmental sustainability.
- Furthermore, there are ongoing projects, including a new feed system for the biomass boiler, and a new broke line. These investments are crucial for enhancing the efficiency and sustainability of our mill's processes.

### **Environmental Investment Plan and Resource Management:**

- Since 2012, MEL has dedicated itself to an environmental investment plan, amounting to €20,000,000. This plan underscores our long-term commitment to implementing eco-friendly practices across all facets of our operations.
- Our investment in 2014 of €2,000,000 in biological cleaning processes and the adoption of environmentally friendly paper production and processing systems exemplify our approach to eco-innovation.

### **Resource Optimization and Reduction in Carbon Footprint:**

- MEL's initiatives in water conservation have successfully led to an 11% reduction in water usage, demonstrating our effective resource management strategy.
- The construction of a new biomass combustion plant in 2015, and its subsequent expansion in 2021, significantly cut down our CO2 emissions by 68%, marking a milestone in our journey towards a greener future.

### **Sustainable Practices and Community Engagement:**

- Embracing sustainable raw materials, MEL predominantly uses pre-consumer wastepaper and post-consumer wastepaper in production, effectively saving around 30,500 tons of oil each year.
- We are proud that 95% of our thermal energy is sourced from renewable biomass, aligning with our commitment to sustainable energy use.
- Our investment of €5,000,000 in a natural gas power plant benefits not only our production lines but also the surrounding community of Kato Gefyra, providing the residents with access to the natural gas network. Leveraging the capabilities of the new power generation unit with a capacity of 8.8 MW, MEL has modified its production lines to efficiently utilize the generated thermal energy.

MEL's dedicated investment in sustainable infrastructure and services is a core part of our mission to lead the way in environmental stewardship within our industry. Through these comprehensive initiatives, we not only bolster our operational efficiency but also contribute significantly to global sustainable development goals.



## 1.11 Stakeholders

(GRI 2-29)

MEL recognizes the vital importance of its stakeholders who have a significant influence, both directly and indirectly, on the company's operations and growth. These stakeholders include entities and organizations impacted by MEL's activities as well as those influencing its corporate trajectory.

MEL places great importance to the regular assessment of its stakeholders, aligning with the evolving needs and strategies of the company within a dynamic and competitive business environment. Continuous interaction and meaningful dialogue with these stakeholders are essential for the company's flexible and efficient operation, aiding in shaping and continually strengthening trust-based relationships.

In the following table, we list the selected stakeholders due to their significant collaboration with the company. Engaging with these parties bolsters MEL's vision for a sustainable and forward-looking future, reinforcing its commitment to long-term environmental and economic sustainability. The company maintains transparent and robust communication with its stakeholders through email, telephone, in-person meetings, official memoranda, and via our official website, ensuring a comprehensive and inclusive approach.

Employees	Suppliers and Partners
Shareholders	State and Regulatory Authorities
Investors	Unions and Associations
Customers	Banks







## 1.12 Memberships

(GRI 2-28)

MEL proudly holds memberships in several influential associations, reflecting our dedication to the highest standards in the paper and packaging industry. We are a member of the Confederation of European Paper Industries, a key platform that fosters collaboration and innovation within the European paper sector. Additionally, our participation in the European Carton Makers Association and ProCarton underscores our commitment to promoting sustainable packaging solutions and advancing industry best practices.

Moreover, we are actively engaged in national advocacy through our memberships in the Business and Industry Association (SEV), the Association of Industrial Energy Consumers (EVIKEN), and the Union of Greek Industries (SVE). These affiliations demonstrate our holistic approach to sustainability, encompassing not only environmental considerations but also our dedication to socio-economic development within the communities we operate. Furthermore, our CEO presides over the newly formed Union of Paper Industries of Greece (E.VI.XE.), emphasizing our leadership role in shaping the future of the paper industry at both national and international levels.

By participating in these influential organizations, MEL actively contributes to the development and promotion of sustainable practices, while also staying at the forefront of industry trends.



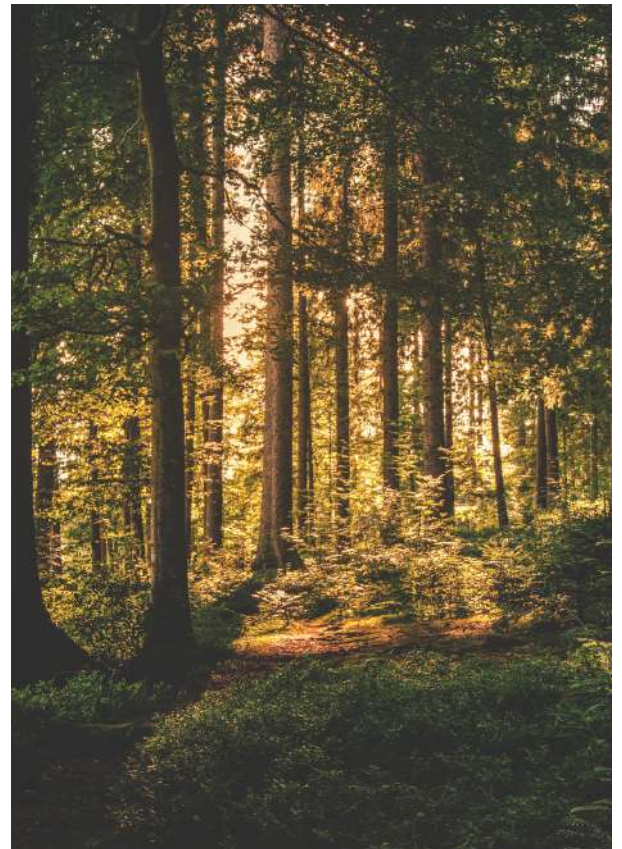
## 2. Sustainability



At MEL, sustainability is not just a concept, but an integral part of our business model and our corporate identity. We recognize that our role in the industry puts us in a unique position to make a significant impact on environmental conservation and sustainable development. Our operations are designed to not only minimize our ecological footprint but also to set new benchmarks for sustainable practices in the industry.

Our journey towards sustainability is marked by strategic actions and integrated performance targets that aim to reinforce our commitment to sustainable development. We are continuously exploring innovative ways to improve our environmental performance and integrate sustainable practices at all levels of our operations.

Investing in green initiatives and financing is at the heart of our strategy, reflecting our determination to lead the transition to a more sustainable future. These efforts are not just about compliance, but about going above and beyond to ensure that our operations make a positive contribution to the planet and society.



## 2.1 The UN Sustainable Development Goals

As a forward-thinking company, MEL has always been at the forefront of integrating sustainable practices into every facet of our operations. Our commitment extends beyond mere compliance; it is an intrinsic part of our corporate ethos.

Our innovative approaches are not just strategies, but testimonies of our dedication to a greener future. We understand that the health of our environment is inextricably linked to our business, and therefore, every decision we make is guided by principles of sustainability and ecological balance. It is for that reason that we have embraced the United Nations Sustainable Development Goals as a guiding framework for our sustainability initiatives.

The United Nations crafted the Sustainable Development Goals (SDGs) in 2015, in the wake of global challenges and a shared commitment to building a sustainable future. These 17 goals serve as a blueprint for addressing pressing issues and achieving a more prosperous, equitable, and environmentally friendly world by 2030.

MEL recognizes the urgency and significance of the challenges outlined in the SDGs. Our target has been to not only operate as a successful business but also to be a responsible corporate citizen that actively contributes to global progress. We are proud to align our operations with the SDGs, reflecting our dedication to social responsibility, environmental stewardship, and economic inclusivity.

At MEL, we understand the critical role businesses play in creating positive change. Our commitment to the SDGs is not merely symbolic; it is ingrained in our core values and daily operations. We have identified key areas where our business intersects with the SDGs, and we strive to make a meaningful impact in these domains. MEL actively contributes to the achievement of specific SDGs through a range of initiatives, summarized in the following table.



## United Nations Sustainable Development Goals

### MEL's Contribution

#### 3 GOOD HEALTH AND WELL-BEING



Our priority at MEL is to ensure the health and safety of not only our customers through our high-quality products but also our employees. We diligently adhere to all necessary procedures and regulations to maintain a safe and healthy working environment. Our efforts are focused on enhancing workplace conditions, particularly in the areas of health and safety, to reduce the likelihood of accidents and to ensure that everyone, including visitors to our facilities, is protected. We are constantly working towards creating a workplace that positively impacts the daily lives of our employees. Our goal is to establish an environment that is not only safe but also conducive to the overall well-being of our staff.

#### 4 QUALITY EDUCATION



In line with our commitment to sustainable development, MEL places a high emphasis on inclusive and equitable quality education. We actively promote lifelong learning opportunities for our employees and engage with local communities to support educational initiatives. Continuous learning and development are integral to our philosophy. MEL invests in regularly updating and strengthening the knowledge of our employees, especially in areas related to health and safety and best work practices. This ongoing education ensures that our team is not only well-versed in the latest industry standards but also equipped with the skills and knowledge to contribute effectively to our collective goals.

#### 6 CLEAN WATER AND SANITATION



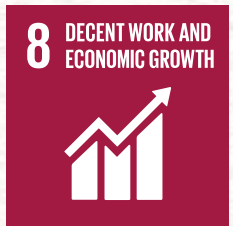
MEL has taken a proactive approach by sourcing water from our own wells, reducing reliance on external water supplies. This decision not only helps in managing our water footprint more effectively but also contributes to easing the pressure on local water systems. In addition to responsible water sourcing, we have established an advanced biological wastewater treatment system at our facilities. This system is designed to treat the water we use efficiently, ensuring that it is returned to the environment in a clean and safe state. This process not only minimizes our environmental impact but also aligns with our commitment to sustainable water management.

**United Nations Sustainable Development Goals**

**MEL's Contribution**



Understanding the importance of sustainable energy, MEL is actively investing in measures to boost energy efficiency across our operations. These investments are not just aimed at reducing energy consumption but also at improving overall operational efficiency. By optimizing our energy use, we contribute to a reduction in our environmental footprint while enhancing our profitability. Simultaneously, MEL is shifting its focus towards renewable energy sources. This transition is a strategic move towards reducing our reliance on traditional energy sources, which are often less sustainable and more costly in the long run. By embracing renewables, we are taking a significant step towards a more sustainable and environmentally friendly energy future.



MEL is dedicated to enhancing our workforce's understanding of our production processes, thereby improving efficiency in their daily tasks. We also place a strong emphasis on training our employees in best workplace practices, focusing on boosting productivity. This approach is a key part of our strategy to maintain high standards of efficiency and inclusivity in our workplace, aligning with our broader sustainability objectives.



We are actively investing in state-of-the-art practices to enhance the quality of our products. This investment is part of our broader strategy to not only improve product quality but also to foster sustainable industrial processes. We are committed to adopting approaches that are not just effective but also environmentally responsible and sustainable.



We emphasize our commitment to reducing inequality and promoting human rights. We have a zero-tolerance policy towards discrimination and human rights violations. To support this, we have implemented a robust whistleblowing system to ensure a secure and respectful working environment for all employees. Additionally, MEL is dedicated to inclusivity in the workforce, actively employing individuals with disabilities and demonstrating our belief in equality regardless of race, gender, or disability.

**United Nations  
Sustainable  
Development  
Goals**

**MEL's Contribution**



We are dedicated to contributing to the development of cities and communities that are inclusive, secure, resilient, and sustainable. We adopt circular economy principles, focusing on reducing waste generation and manufacturing recyclable products. This approach lessens our environmental impact and supports the well-being of local communities.



We focus on sustaining eco-friendly consumption and production methods. We are dedicated to offering products that are environmentally safe and recyclable, aligning with our commitment to sustainability. Additionally, MEL partners with suppliers who uphold similar values, ensuring a shared dedication to sustainable practices.



We are committed to protecting and enhancing the resilience of forests and freshwater ecosystems. We are also actively engaged in facilitating the global shift towards a low-carbon economy, guided by our specific targets for reducing greenhouse gas emissions.



We are at the forefront of integrating leading sustainable practices into our operations. Additionally, we are actively involved in managing protected areas and ecosystem services, focusing on conserving biodiversity, water resources, and other essential natural assets.



We are dedicated to fostering peaceful, inclusive societies and maintaining transparent, accountable relationships with institutions at various levels. We strictly oppose injustice, unlawful activities, and discriminatory practices. Furthermore, MEL prioritizes the security of data, implementing robust measures to protect it, and transparently communicates our processes for handling clients' personal data.

## 2.2 Sustainability Performance Targets

In pursuit of a sustainable business model, we adopt a comprehensive approach to its practices, aiming to minimize risk, enhance financial performance, and uphold environmental responsibility. This approach permeates every stage of the business lifecycle, from product development to ongoing operations. By focusing on three core areas, product stewardship, energy efficiency, and resource conservation, MEL implements sustainable business practices.

Implementing sustainable business practices allows organizations to align their financial health, environmental impact, and reputation with long-term sustainability objectives. To achieve this, MEL has established a set of Sustainability Performance Targets (SPTs) that serve as guiding principles for operational improvement.

These targets are presented at the table below, providing MEL with new opportunities to optimize its operations and foster sustainability across all business domains:



## Sustainability Performance Targets

1. We aim to achieve a minimum 5% reduction in the average weight-specific electricity consumption per metric ton of produced products from 1/1/2022 to 31/12/2023, compared to the average electricity consumption in 2020. This initiative seeks to enhance energy efficiency and reduce the environmental impact associated with electricity usage in our production processes.
2. We aim for a 10% reduction in average weight-specific electricity consumption per metric ton of products produced from 1/1/2024 to 31/12/2025, compared to 2020 levels. This demonstrates our commitment to energy efficiency and sustainability in our operations.
3. We target a minimum 20% reduction in average weight-specific thermal energy consumption from fossil fuels, measured in kWh per metric ton of products produced, from 1/1/2022 to 31/12/2023, compared to the average consumption in 2020. This initiative aims to decrease reliance on fossil fuels and promote sustainable energy practices in our production processes.
4. We target a minimum 25% reduction in average weight-specific thermal energy consumption from fossil fuels, measured in kWh per metric ton of products produced, from 1/1/2024 to 31/12/2025, compared to the average consumption in 2020. This initiative aims to significantly reduce our reliance on fossil fuels and promote sustainable energy practices in our production processes.
5. We strive to achieve a 5% reduction in water consumption within its premises, measured in m<sup>3</sup> per metric ton of products produced, by December 2023, compared to the consumption in 2020. This commitment reflects our dedication to efficient water management and sustainable production practices.
6. We aim to achieve a 10% reduction in water consumption within our premises, measured in m<sup>3</sup> per metric ton of products produced, by December 2025, compared to the consumption in 2020. This target highlights our ongoing efforts to enhance water efficiency and promote sustainable resource management practices.
7. We target to increase the coverage of paper raw material needs from secondary sources and/or materials with FSC (Forest Stewardship Council) certification or equivalent certification to a minimum average rate of 96% during the period from 1/1/2022 to 31/12/2023. This commitment reflects our dedication to sustainable sourcing practices and promoting responsible forest management.
8. We target to increase the coverage of paper raw material needs from secondary sources and/or materials with FSC (Forest Stewardship Council) certification or equivalent certification to a minimum average rate of 97% during the period from 1/1/2024 to 31/12/2025. This commitment demonstrates our ongoing efforts to prioritize sustainable sourcing and support responsible forest management practices.
9. We aim to participate in or organize a minimum of two sustainable development and circular economy events annually between January 1, 2022, and December 31, 2025, to promote awareness and support for sustainable practices.





In addition to the abovementioned Sustainability Performance Targets (SPTs), MEL is committed to minimizing environmental impact, conserving natural resources, and promoting social responsibility. To achieve these goals, the following principles have been integrated into the company's strategy:

- Better management of natural resources and ongoing environmental control of MEL's activities.
- Protection of the environment and prevention of environmental accidents.
- Enhancing the company's competitiveness in the domestic and international markets while simultaneously promoting sustainable business practices.
- Ensuring customer satisfaction through effective measurement and continuous improvement initiatives.
- Prioritizing the health and well-being of customers through rigorous quality control and safety measures.
- Ensuring compliance with all applicable laws and regulations, and actively working towards eliminating non-conformances.
- Promoting the use of environmentally friendly raw and auxiliary materials that meet certified sustainability requirements.
- Implementing robust monitoring and measurement processes to ensure the quality of products at every stage of production.
- Fostering a working environment that promotes innovation, collaboration, and employee engagement.
- Empowering and developing a highly skilled workforce that actively contributes to the ongoing improvement efforts of the organization.
- Conducting regular assessments to measure the effectiveness and evaluate the performance of existing mechanical equipment.
- Gradually introducing new technologies to improve product quality and increase productivity.



## 2.3 Green Financing

MEL proudly stands as one of the pioneering Greek companies to secure financing based on Environmental, Social, and Governance (ESG) criteria. This achievement reflects our deep-rooted commitment to sustainable business practices and our leadership role in embracing the principles of the circular economy.

Our business model, intricately woven with the concept of sustainability, plays a crucial role in our financial strategy. We understand that any disruptions in our supply chain or deviations from our sustainability-centric business model could adversely affect our financial resources. Therefore, embedding sustainability in every aspect of our operations is not just a choice but a necessity, closely tied to the stipulated terms of our green financing agreements.

Green financing presents unique risks, particularly related to a company's ESG performance. Aware of these nuances, MEL has adopted a careful and strategic approach to managing our environmental and social impact. Our focus is not only on maintaining but also on enhancing our ESG performance. This is crucial in ensuring that MEL upholds a strong credit rating and favorable interest rates, thereby optimizing our cost of capital without adding financial strain.

By integrating ESG considerations into our financial strategies, MEL is not only contributing to a more sustainable world but also setting a benchmark for responsible corporate finance in Greece.

### 3. Materiality Analysis (GRI 3-1, 3-2, 3-3)



This analysis was carried out in accordance with the updated methodology of the GRI Standards (GRI Standards 2021), taking into account other international standards and sectoral assessment bodies (e.g. S&P Global Ratings, MSCI, SASB standards, ATHEX ESG Guide, London Stock Exchange Guide). The analysis was structured in four main phases:

Understanding the Business Environment: At the beginning of the materiality analysis, we aimed to understand how our business model and value chain interaction processes affect and shape sustainability issues related to our company. This phase is critical for defining strategies and achieving performance improvements.

Impact Identification: During the second phase, we identified both the positive and negative impacts of MEL's business activities, either existing or potential. Through this process, we aimed to evolve our strategies to enhance the positive effects and counter the negative ones.

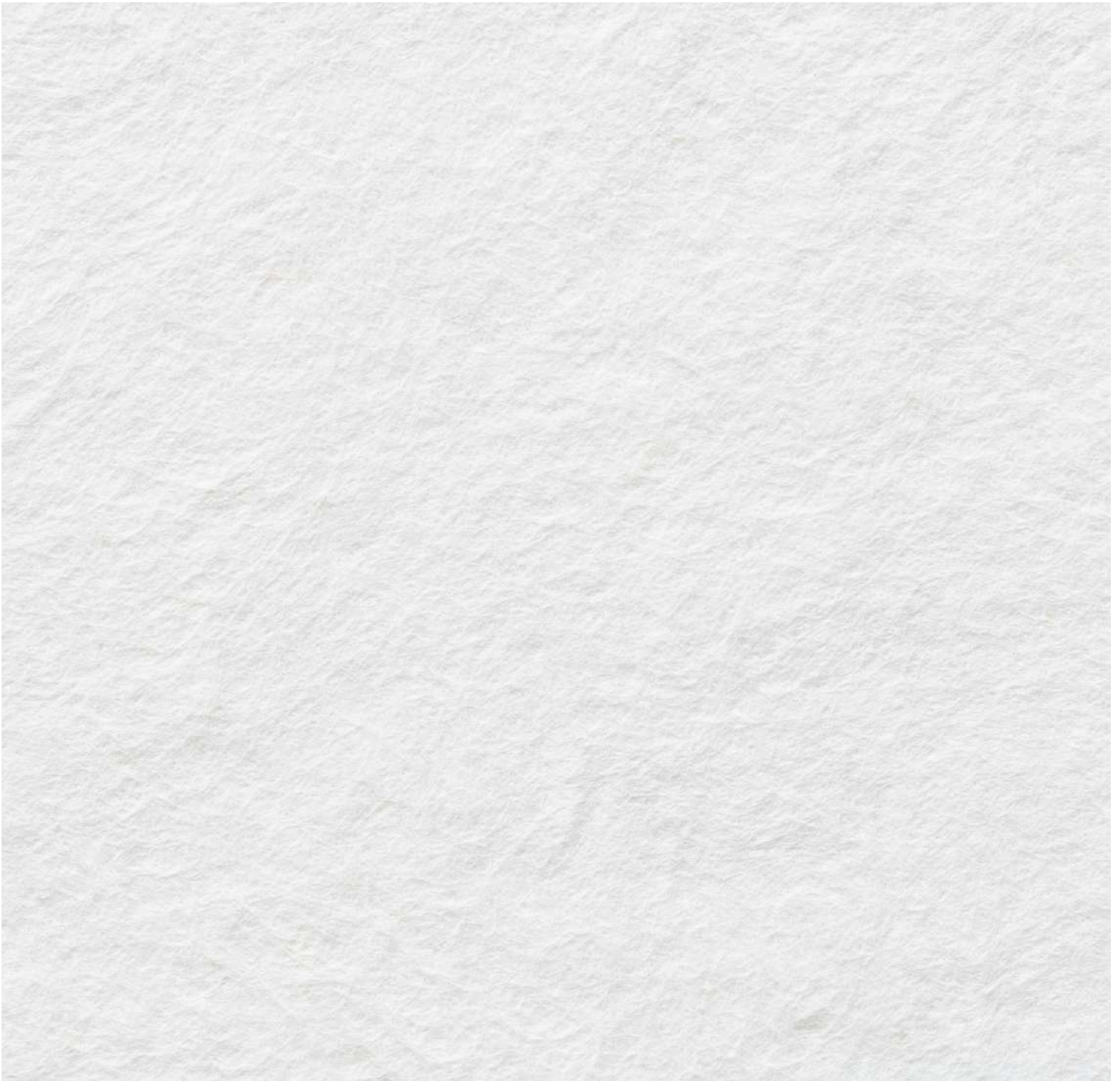
Impact Assessment: In the third phase, we considered the impact on the three main pillars of ESG (Environmental, Social, and Governance). The company, with the aim of exploring and understanding the perspectives of interested parties, created and distributed an anonymous online questionnaire. This was a strategic move to identify impacts deemed critical to the company from a stakeholder perspective.

Prioritization of impacts and validation of material issues: The final phase emphasized the ranking of impacts identified through the thorough process of identification, analysis, and evaluation. This stage involved the identification of the essential issues chosen as central to the composition of the report, and the assessment of their implications and impact.

Throughout this process, MEL has reaffirmed its ongoing commitment to positive change in society, the economy, and the environment. By adopting this approach, our company aspires to further establish itself as an innovative and responsible business entity, demonstrating a strong commitment to sustainability.

The following list illustrates the significant issues identified for MEL through the materiality analysis process. This thorough approach underscores MEL's commitment not only to understanding but also to actively shaping a sustainable future.

1. Occupational Health and Safety
2. Employment
3. Regulatory Compliance & Business Ethics
4. Responsible use of raw materials
5. Customer Privacy & Data Protection
6. Community Support
7. Product Quality and Customer Satisfaction
8. Management of GHG emissions
9. Waste management
10. Water management
11. Rational use of energy



## 4. Environment (GRI 304-1)



Our dedication to sustainability is not just a corporate responsibility; it's a fundamental part of our identity, woven into every aspect of our operations.

Our operational site is situated in the area of Kato Gefyra, Thessaloniki, Greece. This location places us in proximity to regions of significant ecological value, highlighting our responsibility and commitment to environmental protection and biodiversity conservation.

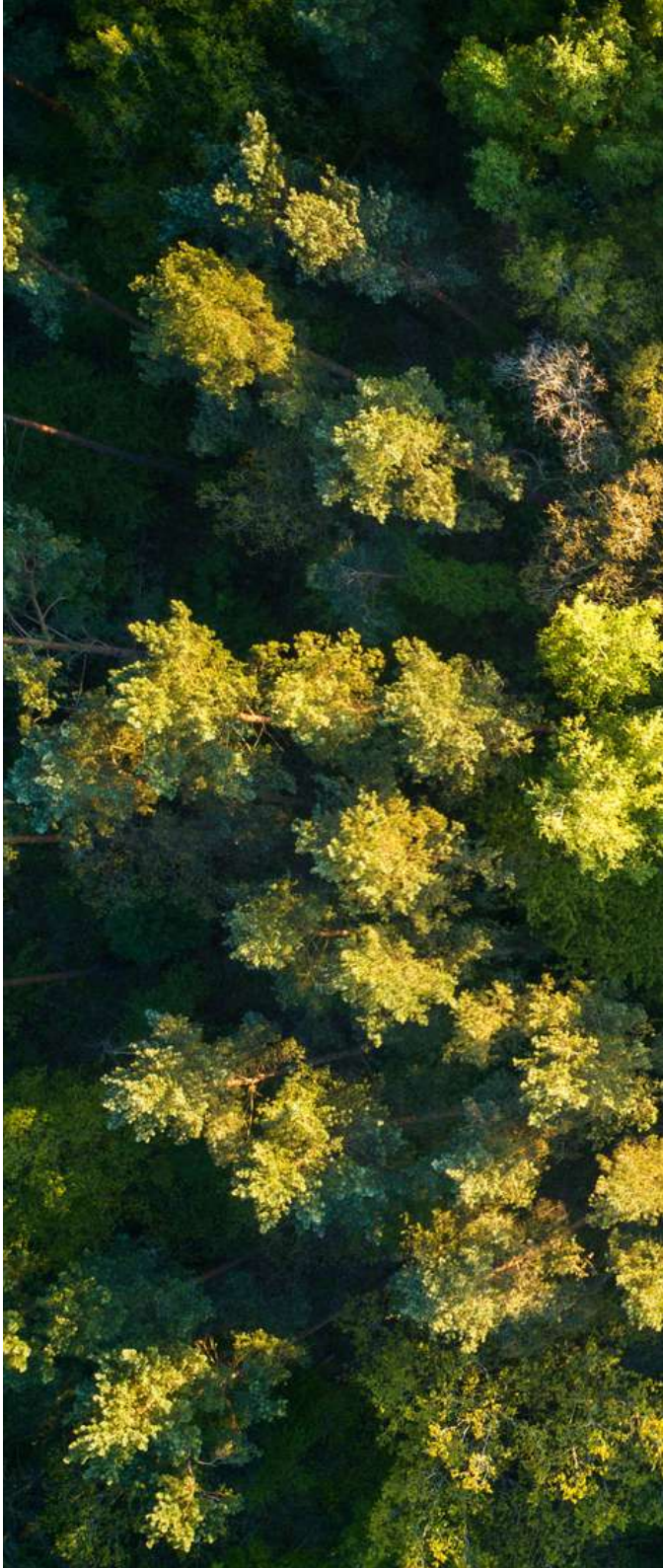
MEL specializes in the production, processing, and sales of cartonboard. Our operations are designed to be environmentally friendly, with a focus on minimizing our ecological footprint. We employ sustainable practices in every aspect of our operation, from sourcing materials to the production processes, ensuring that our impact on the surrounding biodiversity is kept to a minimum.

The size of our operational site is 209,467.27 square meters. This expansive area is managed with the utmost care and consideration for the surrounding natural environment. We have implemented a range of environmental management practices to ensure that our presence supports rather than detracts from the local biodiversity.

We recognize that our responsibility extends beyond the confines of our manufacturing facilities, influencing a broader ecological footprint. Our approach to environmental management is holistic, encompassing careful resource utilization, innovative waste management strategies, proactive greenhouse gas emissions control, energy conservation, and mindful water usage.

Through our actions, we aim to set a benchmark in the industry, proving that environmental responsibility and business success are not mutually exclusive but are, in fact, complementary. Our journey towards a more sustainable future is driven by a deep sense of duty to the planet and our community.

We illustrate our proactive response to the growing environmental challenges of the modern era. Our commitment to this cause is exemplified by the development of an Environmental Management System (EMS), which is in strict adherence to the International Standard ISO 14001:2015. This initiative not only bolsters our overall environmental policy but also emphasizes our focus on safeguarding the environment, effectively managing natural resources, and maintaining vigilant environmental oversight across all our operations.



Our environmental policy comprehensively covers every aspect of our production processes, forming the cornerstone of our strategy to mitigate the environmental impact of our activities and cultivate a worldwide corporate environmental ethos. The management team at MEL has wholeheartedly embraced and implemented this policy, integrating it into our ongoing endeavors to enhance our environmental footprint. This is particularly evident in our cartonboard production and sales operations, where the EMS plays a pivotal role.

To ensure the successful execution of our environmental objectives, MEL is committed to the following key actions:

- **Framework Development:** We have established a robust framework for setting, monitoring, and reviewing our environmental goals and objectives, ensuring they align with our long-term environmental vision.
- **Environmental Protection:** Our strategies are geared towards safeguarding the environment, with preventive measures in place to avert environmental incidents.
- **Regulatory Compliance:** We diligently comply with all relevant legal and other EMS-related requirements, maintaining high standards of environmental governance.
- **Ongoing Improvement:** There is a constant focus on enhancing our EMS, with the ultimate goal of continually improving our environmental performance.

Through the identification of risks and opportunities associated with environmental factors, compliance obligations, and the needs and expectations of our stakeholders, MEL ensures that our Environmental Management System, conforming to ISO 14001:2015, not only attains its intended outcomes but also shows consistent progress. Our dedication to environmental management solidifies MEL's reputation as a responsible, environmentally-conscious company, committed to making a significant and positive environmental impact and leading the way in sustainable industry practices.



## 4.1 Responsible use of raw materials

(GRI 3-3, 301-1, 301-2, 301-3)

As a leader in the paper recycling and cardboard manufacturing industry, we understand the critical importance of responsible sourcing and utilizing raw materials. Our approach is rooted in the principles of sustainability, ensuring that every step in our process not only meets but exceeds industry standards. At MEL, we recognize that the judicious use of raw materials is not merely a business practice but a testament to our dedication to environmental stewardship. Through innovative recycling techniques and efficient material usage, we strive to minimize waste and maximize resource efficiency. This commitment reflects our belief in the power of sustainable practices to create a positive impact on both the environment and our business.

During the reporting period, we have achieved a significant milestone in sustainable resource utilization. Our total consumption of materials reached 161,008 tonnes. Of this, a substantial portion, amounting to 150,000 tonnes (93%), comprised renewable materials, while only a minimal fraction, 11,008 tonnes (7%), of our total material usage involved non-renewable resources.

Moreover, 85.5% of our input materials are recycled, reflecting our deep-rooted commitment to environmental stewardship. This achievement is a result of our conscientious approach to sourcing and utilizing materials, where we prioritize recycled content without compromising on quality.

In our production process, we adhere to stringent standards and methodologies. Our final product boasts a composition of 95% recycled fibers and 5% virgin materials, striking a balance between sustainability and product excellence. Our secondary raw materials are not recycled, ensuring that we maintain the highest quality standards. The final product composition is carefully crafted with 95% fibers and a 5% coating, exemplifying our commitment to both environmental responsibility and product superiority.

It is worth noting that 85.5% of our products and their packaging materials were reclaimed within the reporting period. This statistic represents the proportion of our products and packaging materials that were successfully reclaimed, as compared to the total products sold in the same period. Our focus on reclaiming materials underscores our commitment to reducing waste and promoting a circular economy.



### 4.1.1 The life cycle of cartonboard

Our commitment to environmental sustainability is at the heart of our operations, with recycled paper being the primary raw material in our production. With recycled paper representing a very significant percentage of the resources we use and with the utilization of renewable energy sources, we have established a self-sustaining lifecycle for our products, reaffirming our dedication to eco-friendly practices.

Here's how we transform recycled paper into our premium cartonboard:

- 1. Collection and Transport:** Recycled paper is collected and transported to our warehouses using specially designed lorries, ensuring efficiency and safety.
- 2. Paper Selection:** We meticulously select the most suitable paper for recycling, adhering to strict quality standards.
- 3. Pulping Process:** The selected paper is then mixed with water in our specialized pulpers, transforming it into a manageable pulp.
- 4. Purification:** This pulp undergoes thorough cleaning, passing through centrifugal filters and pressure sleeves to remove any foreign materials like plastic, glass, or metal.
- 5. De-inking:** The clean paper pulp is then subjected to a de-inking process, efficiently removing any remaining ink.
- 6. Preparation for Production:** After de-inking, the pulp is dehydrated, dried, and formed into large rolls, ready for the next stage of production.
- 7. Cartonboard Formation:** The prepared paper rolls are then processed into high-quality, recycled cartonboard, ready for various uses.
- 8. Recycling Potential:** Our recycled paper boasts remarkable longevity, capable of being recycled up to seven times without losing its essential fiber properties.



## 4.2 Waste management

(GRI 3-3, 306-3, 306-4)

During the reporting period, MEL generated a total of 4,385.373 tonnes of waste. Our waste is meticulously categorized to ensure proper handling and disposal. Of this, a minimal amount, just 0.763 tonnes, was hazardous waste, primarily consisting of Waste Lubricating Oils (WOL). We take special care in managing this hazardous waste, recycling it through an alternative management system, demonstrating our commitment to responsible environmental practices. This approach ensures that hazardous materials are treated with the utmost care, mitigating environmental risks.

The vast majority of our waste, amounting to 4,384.61 tonnes, was non-hazardous. This non-hazardous waste plays a crucial role in our sustainability efforts, as it is transposed into raw materials for the production of alternative fuels (refuse-derived fuel - RDF). This innovative approach not only helps in reducing landfill waste but also contributes to the creation of sustainable energy sources.

In the reporting year, MEL successfully diverted a total of 4,385.37 metric tons of waste from disposal. This achievement underscores our commitment to reducing landfill waste and promoting a circular economy.

Our waste diversion encompasses both hazardous and non-hazardous waste types. Specifically, we have diverted 0.763 metric tons of hazardous waste, primarily consisting of Waste Lubricating Oils (WOL). In contrast, the bulk of our diversion efforts have been focused on non-hazardous waste, totaling 4,384.61 metric tons.

The non-hazardous waste diverted from disposal is chiefly registered under the European Waste List code 03 03 07. We have innovatively adapted these materials for use as raw materials in the production of alternative fuels like RDF.

All our waste, both hazardous and non-hazardous, is managed offsite in specialized facilities. This offsite management ensures that waste is handled in the most environmentally responsible manner.

To ensure accuracy and transparency, our waste categorization and measurement are conducted in accordance with the Decisions on Approval of Environmental Terms. MEL's weighing system is employed for precise measurement, providing a clear and accountable record of our waste management efforts.

We believe that effective waste management is a key component of our environmental responsibility. Our strategies and practices in handling waste are designed to minimize environmental impact and contribute to a circular economy. We continually strive to improve our waste management processes, aiming to reduce waste generation further and enhance our recycling and recovery efforts.





### 4.3 Rational use of energy

(GRI 3-3, 302-1, 302-3, 302-4)

As an environmentally conscious company, we place a strong emphasis on optimizing our energy use and shifting towards more sustainable energy sources.

Our total energy consumption for the reporting period stood at 226,752.96 MWh . This consumption includes a variety of energy sources, both renewable and non-renewable. From non-renewable sources, we used 16,228.18 MWh of LPG and 2,777.17 MWh of fuel oil (mazut). However, in line with our commitment to sustainability, a significant portion of our energy usage, 150,068.59 MWh, came from renewable sources like pellet fuel. Our electricity consumption was 57,679.03 MWh, while heating and steam consumption were 169,073.93 MWh and 207,435 m<sup>3</sup>, respectively.

The company showed a decrease in electricity consumption, from 2020 to 2022. This is demonstrated in the table below with the annual electricity consumption of MEL:

2020	2021	2022
64,117.29 MWh	65,499.79 MWh	57,788.797 MWh

Our organization's energy intensity ratio stands at a notable 0.00209 MWh per tonne of mix production. This ratio is a vital measure of our efficiency, representing the amount of energy used per tonne of mixed production. To calculate this ratio, we consider a variety of energy types, encompassing both the direct and indirect energy consumptions within our facilities. This includes electricity, which is crucial for lighting, operating our pneumatic systems, and ensuring the smooth movement of machinery parts across our operations. Additionally, thermal energy plays a significant role in our processes, being essential for the drying process of cartonboard, heat shrinking in our packaging machines, and maintaining optimal temperatures in our machinery, pre-production, and converting departments.

This comprehensive energy intensity ratio is calculated solely based on the energy consumption within our company. It reflects our focused efforts on improving energy efficiency internally, highlighting our proactive approach to reducing our environmental footprint.

For the year 2022, we accomplished an 11% reduction in thermal energy usage and a 12% reduction in electrical energy consumption. These reductions are a direct result of our targeted conservation initiatives and our relentless pursuit of efficiency improvements across all operations.



### 4.3.1 Energy Policy

Operating in the inherently energy-intensive field of cartonboard production and sales, we recognize the critical importance of efficient energy utilization. To address this, we have meticulously developed an Energy Management System, aligned with the international standard ISO 50001:2018, reflecting our commitment to sustainable energy use.

The management at MEL is deeply committed to the following key principles in our energy policy:

- **Continuous Improvement in Energy Efficiency:** We are dedicated to perpetually enhancing our energy efficiency. This involves providing necessary information and resources to achieve both quantitative and qualitative goals set within our energy management system framework.
- **Adherence to Legal and Regulatory Standards:** Our energy policy includes strict compliance with all applicable laws, regulations, and other requirements related to energy management, ensuring we uphold high standards of energy governance.
- **Promotion of Renewable Energy and Low Energy Footprint Materials:** Wherever technically and financially viable, we prioritize the use of renewable energy sources. Additionally, we encourage the procurement of materials and services that have a minimal energy footprint, underlining our commitment to environmental sustainability.

This Energy Policy is communicated clearly to all stakeholders, both internal and external to the organization, to ensure collective effort towards achieving the objectives set forth in our energy management system. This involves the rational management of energy in all its forms.

Initially, MEL has implemented this Energy Management System within the scope of our productive activities at the Thessaloniki Industrial Park in Kato Gefyra, Thessaloniki. This strategic choice marks our commitment to setting a benchmark in energy management and serves as a model for future expansions of the system.

### 4.3.2 Energy Production

In 2020, MEL embarked on an ambitious journey towards innovative energy production, choosing natural gas as its cornerstone. This strategic move was marked by a pivotal agreement with EDATHES, the esteemed Natural Gas Distribution Network Operator for Thessaloniki's Regional Unit. This partnership paved the way for extending natural gas pipelines to our factory, a project completed in 2021 with an investment of €2,000,000, entirely funded by MEL.

Our vision was to construct a state-of-the-art natural gas-fired power plant, representing a substantial investment of €5,000,000, financed through our resources. This plant, boasting an impressive capacity of 8.8 MW, is not just a power generator; it ingeniously utilizes the heat produced in our manufacturing processes, transforming it into additional energy. This efficiency not only boosts our production capabilities but is also projected to augment our annual profits by a minimum of €2,000,000.

The impact of this initiative extends beyond our financial gains. It solidifies MEL's standing as a financially robust and forward-thinking company. More so, it has a profound positive effect on the local community. Thanks to our investment, thousands of residents in the surrounding regions will have access to the natural gas network. The imminent commissioning of our power plant marks a new era in our energy production strategy, one that aligns with our goals for sustainability, community development, and financial growth.

## 4.4 Management of GHG emissions

(GRI 3-3, 305-1, 305-2, 305-4, 305-5)

Our dedication to environmental stewardship is reflected in our commitment to minimizing our carbon footprint, an essential aspect of our sustainable business practices.

For the reporting period, our gross direct (Scope 1) GHG emissions amounted to 4,466 tCO<sub>2</sub>eq. Our gross location-based energy indirect (Scope 2) GHG emissions amounted to 33,278 tCO<sub>2</sub>eq. This figure represents our transparent and dedicated efforts to monitor and manage our environmental impact and is verified by the Renewable Energy Sources Operator & Guarantees of Origin (DAPEEP).

Additionally, we have calculated the GHG emissions intensity ratio for our company, which stands at 0.35 tCO<sub>2</sub>eq per tonne of mix production. This ratio is a crucial indicator of our efficiency in managing emissions relative to our production scale. This choice provides a meaningful and relevant measure of our emissions efficiency, taking into account the scale of our operations.

Our GHG emissions intensity ratio includes both direct (Scope 1) and energy indirect (Scope 2) emissions, offering a comprehensive view of our carbon footprint. The primary gas included in our calculations is CO<sub>2</sub>, which is a significant contributor to global warming and climate change.

At MEL, our approach to managing GHG emissions is multifaceted and continually evolving. We are committed to implementing innovative strategies and adopting best practices to reduce our GHG emissions further. Our efforts in this area are driven by our responsibility towards the planet and future generations, and we strive to be a model of environmental excellence in our industry.

A direct result of our targeted reduction initiatives is the reduction by 2022 of our GHG emissions by an impressive 21% since 2020. The methodologies that were followed for the measurement of our emissions were according to the Decisions on Approval of Environmental Terms. This substantial decrease is reflecting our ongoing commitment to environmental responsibility and our proactive approach to combating climate change.

In our calculations, we have focused primarily on CO<sub>2</sub> emissions, recognizing its critical role as a major contributor to global warming. Our efforts to reduce these emissions are part of our broader strategy to address the most impactful areas of our environmental footprint.

The basis for our comparison and calculation of GHG reductions is set against the year of 2020. This approach provides a clear and consistent reference point for measuring our progress and understanding the impact of our reduction initiatives.

The scopes in which these reductions occurred include both direct (Scope 1) and energy indirect (Scope 2) emissions. This comprehensive approach ensures that we are addressing all relevant areas of our operation where GHG emissions can be effectively managed and reduced.

At MEL, we believe that our actions towards reducing GHG emissions not only contribute to a sustainable future but also demonstrate our role as a responsible leader in the industry. Our commitment to continuous improvement in this area is unwavering, and we remain dedicated to implementing strategies that further our goal of reducing our carbon footprint and contributing positively to global environmental efforts.

## 4.5 Water Management

(GRI 3-3, 303-1, 303-3, 303-4)

Our commitment to sustainable water management is a key aspect of our environmental strategy, reflecting our dedication to preserving natural resources and promoting ecological balance.

At MEL, we predominantly utilize water for our internal production processes, sourcing it almost entirely through private wells. This practice significantly reduces our impact on the local water distribution network, demonstrating our commitment to minimizing our environmental footprint. We have invested in a state-of-the-art wastewater treatment plant within our facilities, which is capable of biologically cleaning and recycling water used in our production processes. This plant not only serves our current needs but is also designed to accommodate much larger production lines, with a capacity of 17,000 m<sup>3</sup> and an investment of approximately €2,000,000. MEL has non-resettable counters and the amount to be pumped does not exceed 1,400,000 m<sup>3</sup> per year.

Our approach to water management is a prime example of our commitment to the principles of a circular economy. Our water-related goals and targets that are part of the company’s approach to managing water and effluents are determined by the Decisions on Approval of Environmental Terms that MEL should follow. By recycling water, we lessen our environmental impact and significantly reduce our need for freshwater withdrawals, as evidenced by the decrease in the amount of water we withdrew in 2022 compared to 2021. Established in 2004 and expanded in 2014, our wastewater treatment plant is a testament to our long-term commitment to sustainable water use.

The methodology that has been followed in order to measure the water discharge is the DCF, and every measurement has been made according to the Decisions on Approval of Environmental Terms. Detailed information about our water withdrawals from 2020 to 2022 can be found in the table below:

2020	2021	2022
1,320,833 m <sup>3</sup>	1,355,883 m <sup>3</sup>	1,305,381 m <sup>3</sup>



## 5. Society



At MEL, we believe that our success is intrinsically linked to the well-being of the society we serve. This belief drives our dedication to sustainable and responsible business practices that extend far beyond our core activities of paper recycling and cardboard production. We strive to create a harmonious balance between our business objectives and our social responsibilities, ensuring that our growth contributes meaningfully to the community's prosperity.

Our approach is holistic, focusing on nurturing a workplace that values and develops its people, upholding the highest standards of health and safety, delivering exceptional product quality, and ensuring customer satisfaction. We recognize that our employees are the cornerstone of our success, and their growth and well-being are paramount.

MEL's commitment to society also encompasses a deep respect for human rights and a dedication to contributing positively to local communities.



## 5.1 Product Quality and Customer Satisfaction

### (GRI 3-3)

Our unwavering commitment is to maintain the highest standards of product quality and safety. This commitment is pivotal to the ongoing success and operations of MEL. We continuously seek to enhance the durability and safety of our products, ensuring that they meet and exceed the expectations of our customers. This is achieved through the constant refinement of our processing methods and rigorous auditing of our suppliers' product specifications.

At MEL, we are dedicated to delivering superior quality products. Our focus is not just on meeting the industry standards but setting new benchmarks in quality and safety. This involves a meticulous approach to selecting raw materials, implementing cutting-edge production techniques, and conducting comprehensive quality checks. Our goal is to ensure that every product we offer not only meets the functional requirements of our customers but also contributes positively to their well-being.

We understand that customer trust is built on the foundation of product reliability and safety. Therefore, MEL is deeply invested in researching and adopting innovative practices that enhance product quality without compromising the health and safety of our customers.

#### 5.1.1 Quality Policy

MEL's policy is firmly grounded in meeting the evolving needs of our customers and upholding our own high standards of quality, as evidenced through measurable goals. This is achieved while simultaneously ensuring environmental protection. We also ensure compliance with legal and regulatory requirements that govern our products, both at the European and national levels.

The management at MEL is committed to identifying and leveraging opportunities and addressing any threats that might impact the compliance and customer satisfaction of our products. To achieve this, MEL has established a Quality Management System based on the principles of the International Standard ISO 9001:2015. Additionally, to ensure product safety and hygiene, MEL implements the principles of the HACCP system and adheres to Good Manufacturing and Hygienic Practices.

Our management, with the active participation of all employees, undertakes to act, control, evaluate, and improve the company's performance at all operational levels. We have adopted necessary measures to encourage both our employees and external partners, including suppliers, to strive for continuous improvement.

MEL's specific objectives include:

- Strengthening our market position both domestically and internationally.
- Measuring and enhancing customer satisfaction while ensuring their health.
- Eliminating the root causes of non-compliance and minimizing instances of non-compliance.
- Ensuring the use of raw and auxiliary materials that meet specifications.
- Continuously monitoring and measuring the quality of the produced product at every stage.
- Creating a work environment that fosters initiative, creativity, vigilance, and teamwork.
- Ensuring a well-trained and experienced workforce capable of contributing to the continuous improvement of the business.
- Measuring the effectiveness and evaluating the existing technological equipment.
- Gradually introducing new technologies to continuously improve quality and increase productivity.

MEL complies with Greek and EU legislation, cares for the health and safety of its employees, and is environmentally friendly. To ensure the success of these objectives, both the management and all personnel are committed to applying and continually improving the Quality System.

## 5.2 Employment

(GRI 3-3, 2-7, 2-8, 402-1, 405-2)

MEL is dedicated to maintaining an environment that not only complies with the highest labor standards but also goes beyond to ensure the well-being and development of every member of our team.

Our practices are built on the foundation of mutual respect, equality, and empowerment. We believe in nurturing a culture where our employees feel valued, heard, and motivated to achieve their best. Through comprehensive training programs, equitable employment policies, and a steadfast commitment to health and safety, we strive to create a workplace that not only drives our company's success but also contributes positively to the personal and professional lives of our employees.

Detailed data regarding the employees of the company in 2022 is presented in the following tables:

Gender:	Employees	Permanent Employees	Temporary Employees	Full - Time Employees	Part - Time Employees
Male	196	185	11	194	0
Female	20	20	1	19	0
<b>Total</b>	<b>216</b>	<b>205</b>	<b>12</b>	<b>213</b>	<b>0</b>

Gender:	Employees	Permanent Employees	Temporary Employees	Full - Time Employees	Part - Time Employees
Male	90.74%	85.65%	5.09%	89.81%	0.00%
Female	9.26%	9.26%	0.46%	8.80%	0.00%
<b>Total</b>	<b>100%</b>	<b>94.91%</b>	<b>5.56%</b>	<b>98.61%</b>	<b>0.00%</b>



Regarding the integral role of workers who are not formal employees of our company, these individuals are essential contributors to our operations, providing a range of services such as construction and maintenance, IT support, cleaning, security, and environmental management. As of the current reporting period, we have an estimated total of 57 external workers engaged in various capacities: 38 in construction and maintenance, 8 in IT services, 1 in cleaning, 4 in security, and 6 in environmental management.

To ensure transparency and accuracy in reporting, we utilize advanced methodologies, including SAP software and thorough internal records. This approach allows us to maintain a precise count of non-employee workers, treating each external service provider as a single unit irrespective of the frequency or number of individuals they employ in our facilities.

Furthermore, we monitor any significant changes in the number of non-employee workers both during and between reporting periods. Our records indicate that there have been no notable fluctuations in this workforce segment. This stability is a testament to our ongoing commitment to fostering strong, consistent relationships with our external partners, ensuring that all individuals who contribute to our operations are valued and recognized as part of our extended community.

At MEL, we understand the importance of transparent and proactive communication, especially when it involves operational changes that could significantly impact our employees. The minimum notice period we offer varies depending on the nature of the change. For instance, in matters related to safety, we ensure to provide at least a one-week notice. This approach underscores our commitment to employee safety and well-being, allowing ample time for adjustment and preparation.

Furthermore, in scenarios involving collective bargaining agreements, the specifics of the notice period, as well as the provisions for consultation and negotiation, are clearly outlined in our Operating Regulation. This level of clarity and forethought in our policies demonstrates our dedication to fair and respectful labor practices.

Moreover, our approach to remuneration is guided by principles of fairness and equality. We meticulously analyze the ratio of basic salary and overall remuneration between female and male employees across different categories and operational locations. For instance, female employees in permanent roles earn an average of €1,761.63, with specific figures for technical workers at €1,585.22 and administrative employees at €1,792.76. In comparison, their male counterparts earn an average of €1,883.17, with technical workers at €1,450.07 and administrative employees at €2,834.56.

The ratio of the salary of women to the salary of men for employees in technical roles is therefore 1.09, while the same ratio for employees in administrative roles is 0.63.

This data is instrumental in guiding our ongoing efforts to ensure equitable pay across all levels of our organization. We continuously strive to not only meet but exceed industry standards in gender pay equity, reflecting our commitment to fostering an environment of equality and respect.

<sup>1</sup> €1,585.22 / €1,450.07 = 1.09

<sup>2</sup> €1,792.76 / €2,834.56 = 0.63



### 5.2.1 Employee Training

(GRI 404-1, 404-2)

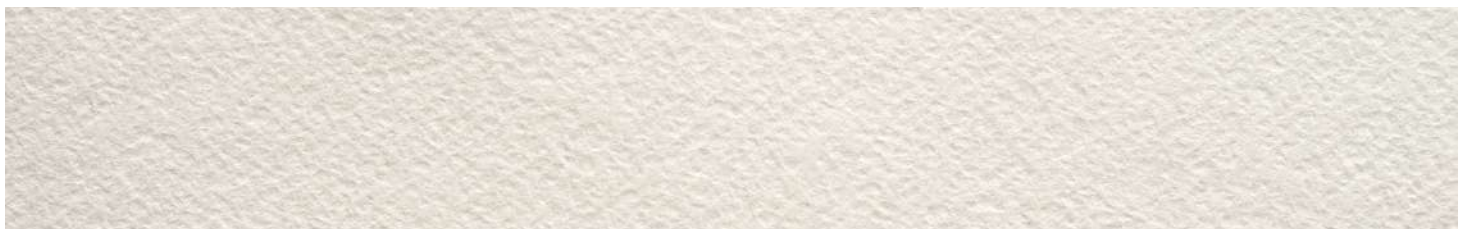
Understanding the pivotal role of training in enhancing skills and knowledge, MEL has invested significantly in the professional growth of our team members.

During the reporting period, our employees engaged in a total of 925 hours of training. This dedication to learning and development is distributed across genders and employee categories, demonstrating our commitment to inclusive and comprehensive training programs. Specifically, our female employees completed 17 hours of training, while their male colleagues completed 908 hours.

Furthermore, we break down training hours by employee category, underscoring our holistic approach to workforce development. Our technical workers received 248 hours of training, while those in administrative roles engaged in 677 hours of instruction. These figures reflect our understanding that different roles require different training focuses and intensities.

As part of our commitment to nurturing the talents and capabilities of our workforce, we have implemented various programs focused on skill enhancement. A key area we have concentrated on is leadership development, understanding its pivotal role in driving team success and fostering a positive work environment. We have established four comprehensive programs specifically designed to cultivate leadership skills among our employees. These programs are crafted to not only refine existing leadership abilities but also to unearth and develop potential among emerging leaders within our organization.

Moreover, MEL is dedicated to supporting our employees through transitional phases in their careers. Whether it's moving into new roles, adapting to technological advancements, or evolving business needs, we ensure that our team members receive the necessary guidance and resources to make these transitions smoothly and successfully.



### 5.2.2 Employee Evaluation

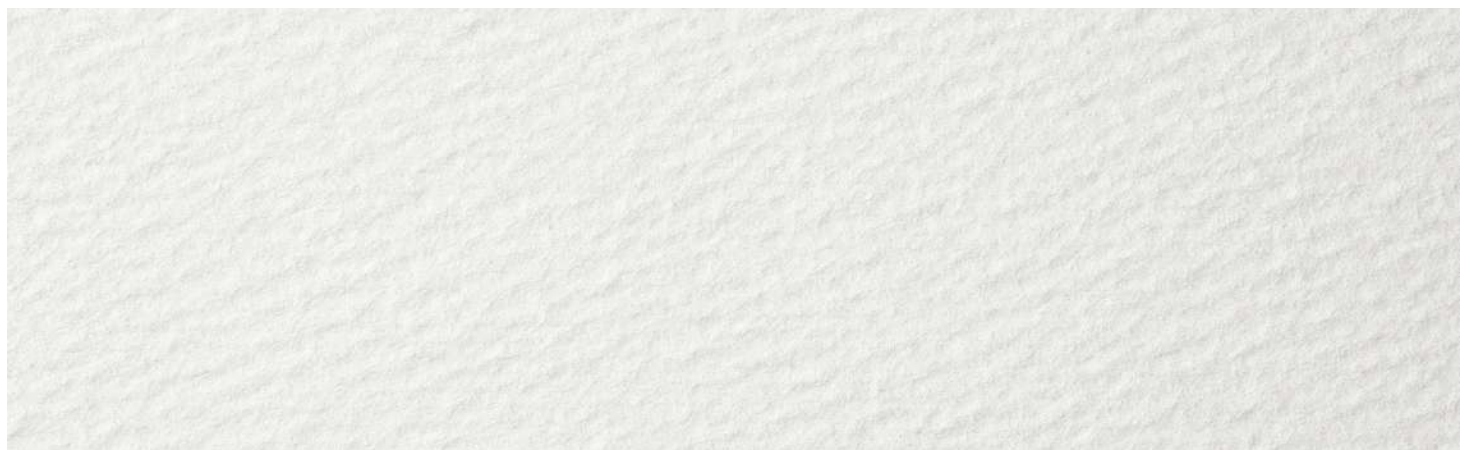
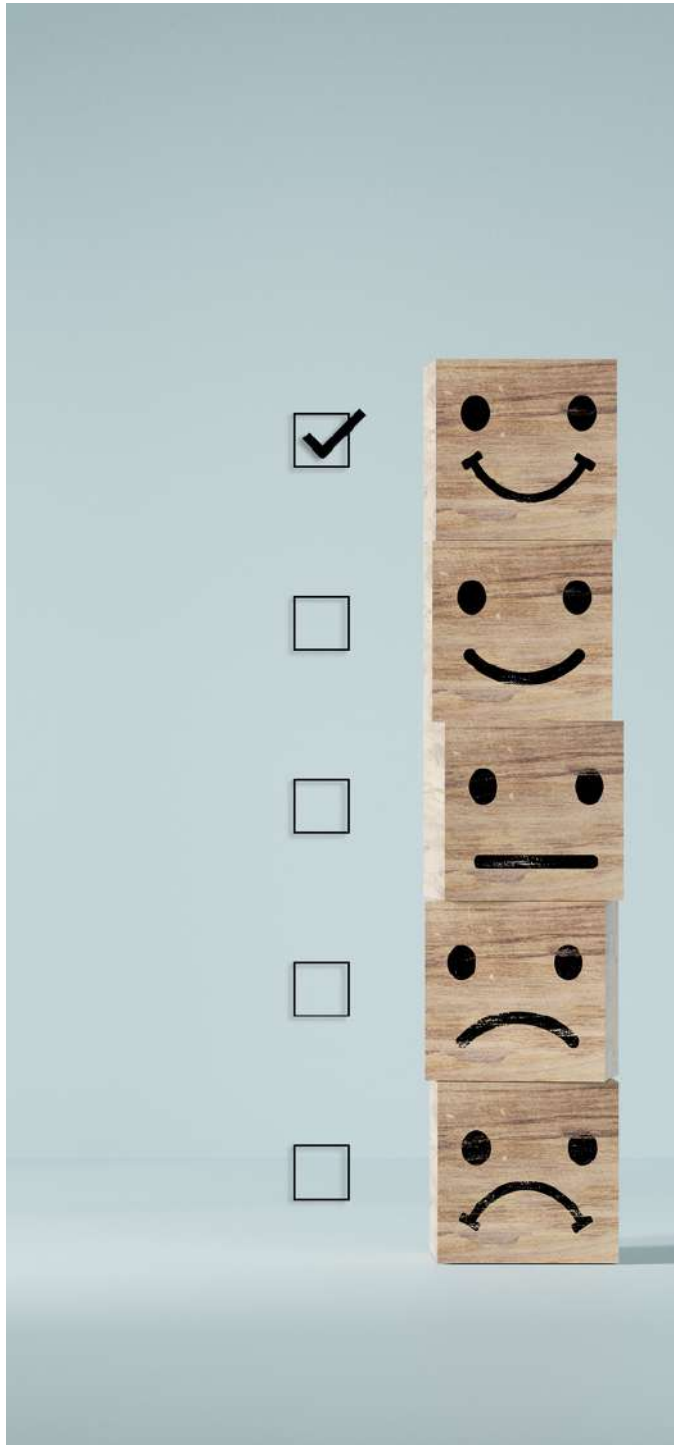
(GRI 404-3)

At MEL, we firmly believe in the value of regular evaluations to not only assess performance but also to foster the career growth of our employees.

During the reporting period, we maintained our commitment to conducting thorough performance and career development reviews for all our employees, totaling 212 (100%) individuals. This process is inclusive and balanced, ensuring that every team member, regardless of gender, receives the attention and guidance they deserve. Specifically, 20 of our female employees (9.43%) and 192 of our male employees (90.57%) underwent these evaluations, reflecting our dedication to maintaining a fair and equitable assessment process across the company.

Breaking down these figures further by employee category, we find that 3 female technical workers (1.42%) and 17 female administrative employees (8.02%) received reviews. Similarly, 113 male technical workers (53.30%) and 79 male administrative employees (37.26%) were also part of this essential evaluation process. This structured approach to regular reviews highlights our commitment to the professional advancement of our employees across all levels and roles within MEL.

We view these evaluations as a crucial tool for personal and professional development. They offer an opportunity for open dialogue, constructive feedback, and planning for future career trajectories within the company. By investing time and resources into these reviews, we not only enhance the skills and satisfaction of our workforce but also reinforce our commitment to nurturing a productive, motivated, and forward-thinking team.





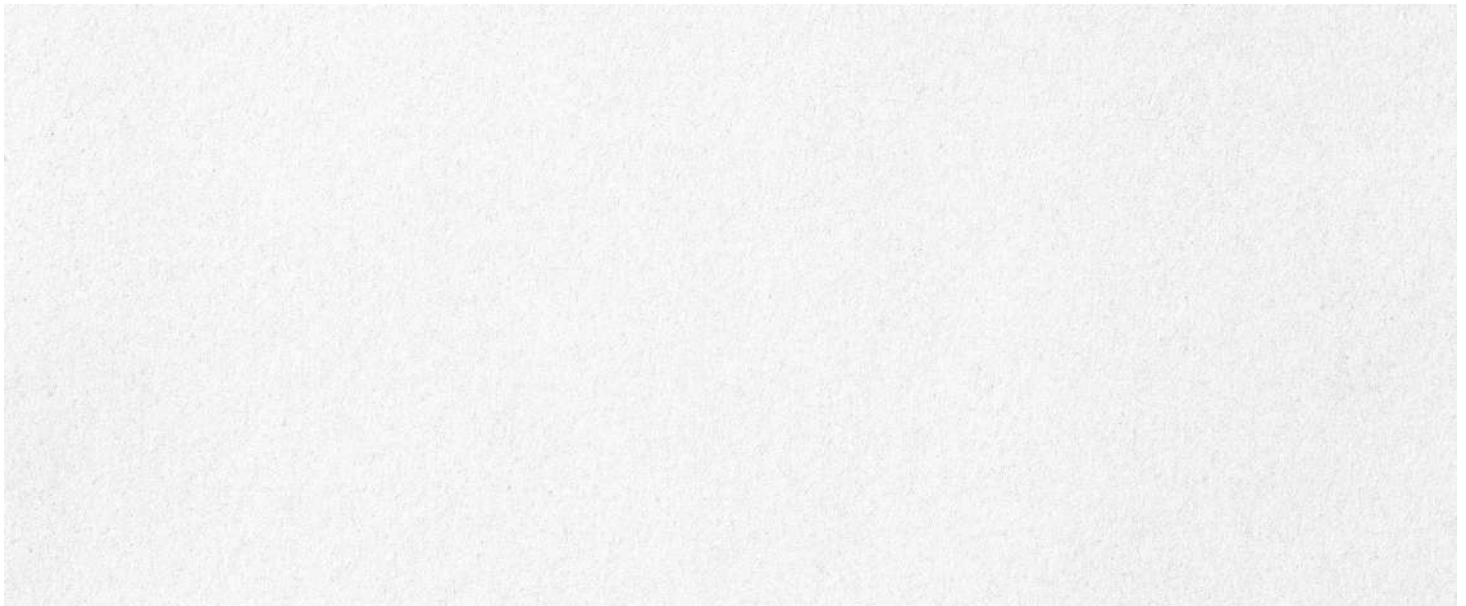
### 5.2.3 Respect of Human Rights

(GRI 406-1)

MEL is committed to upholding Human Rights, emphasizing the creation of a working environment where every employee is valued and can express themselves freely without discrimination. Recognizing the critical importance of a healthy and inclusive workplace, we have instituted a robust whistleblowing system. This system empowers our employees to safely report any instances of discrimination or rights violations, ensuring that their voices are heard and actions are taken.

MEL adheres to a strict policy of zero tolerance towards any form of Human Rights violation. We believe it is essential for all stakeholders to understand that our company operates on the foundations of mutual respect and equality. This commitment to incorporating human rights principles into every aspect of our workplace has led to a notable achievement: we have had no recorded incidents of human rights violations or discrimination at MEL for three consecutive years, from 2020 to 2022.

Our approach goes beyond just compliance; it's about fostering a culture where respect for human rights is ingrained in every action and decision. We continuously strive to reinforce this culture, ensuring that MEL remains a workplace where diversity is celebrated, individual rights are protected, and everyone is treated with dignity and fairness. Through our ongoing efforts, we aim to not only maintain this standard but also to set an example in our industry for respecting and promoting human rights.



## 5.3 Occupational Health and Safety

(GRI 3-3, 403-1, 403-2, 403-3, 403-5, 403-6, 403-7, 403-8, 403-9)

At MEL, the safety and well-being of our employees are paramount. We have established a robust system that not only meets legal requirements but also sets a higher standard for occupational health and safety. Each year, we conduct a comprehensive series of medical examinations for all employees. The nature of these exams is determined based on the specific risks associated with each employee's position, as identified in the Occupational Risk Assessment Study, and also considers the age of the employee.

The Human Resources department, in collaboration with our occupational health physician, ensures that employees are well-informed about their scheduled health assessments. Additionally, independent of the aforementioned criteria, our occupational health physician routinely conducts periodic examinations of each employee. This proactive approach underscores our dedication to maintaining a healthy and safe working environment for all our staff.

Our system adheres to all relevant national and European regulations, ensuring full compliance with the latest health and safety standards. We have integrated the principles of OHSAS 18001:2007 and ISO 45001:2018 into our management practices, reflecting our commitment to maintaining a safe and healthy working environment. The management team at MEL is devoted to consistently improving the performance of this system through both quantitative and qualitative goals. We proactively encourage our staff to contribute their ideas and suggestions to the Occupational Health and Safety Committee, thereby fostering a culture of shared responsibility and continuous improvement.

Further emphasizing our commitment, we have adopted the Health and Safety Management System ISO 45001:2018. This adoption is part of our strategic approach to ensure that both our employees and external collaborators who work on MEL's premises are provided with a safe and secure working environment.

The scope of our Health and Safety Management System is all-encompassing, covering every aspect of the company's operations. We ensure that every worker, activity, and workplace within MEL falls under the protection of this system. Our commitment to health and safety is unwavering, and we take pride in creating a workplace that prioritizes the well-being of every individual associated with our operations. This approach not only safeguards our team but also reinforces our reputation as a responsible and caring employer.



Ensuring the well-being of our working environment is not just a responsibility, but a cornerstone of our business excellence. The following sets out our approach to risk identification, risk assessment and incident investigation, underpinned by our commitment to continuous improvement and best practice:

- **Rigorous Hazard Identification and Risk Management:**

At the forefront of our health and safety protocol is the meticulous identification and assessment of work-related hazards. This process involves a thorough analysis of our production procedures, where we identify potential risks through a combination of objective lists and subjective assessments, including worker feedback, direct observations, interviews, and precise measurements. We also undertake a detailed mapping of our workplace environments, meticulously documenting the machinery, materials, and potential risk sources present. Each identified risk is then quantitatively assessed based on ISO/IEC 51 guidelines, rating the likelihood and severity on a scale from 1 to 5, which aids in prioritizing and managing these risks effectively.

- **Implementation and Enhancement of Safety Measures:**

Our strategy for mitigating identified risks is multi-layered. It begins with the elimination of hazards wherever feasible, followed by substituting processes with less risky alternatives. We also deploy a range of technical and administrative controls, alongside reorganizing work processes and providing Personal Protective Equipment (P.P.E.) to our workforce. Our commitment is reflected not only in the implementation of these measures but also in the continuous recording, reviewing, and upgrading of these safety protocols.

- **Adherence to ISO 45001:2018 Standards:**

MEL's Health and Safety practices are aligned with the internationally recognized ISO 45001:2018 standards. We conduct thorough internal audits and engage in external audits to ensure that our health and safety management systems are both robust and effective.

- **Continuous Improvement and Management Engagement:**

Our Health and Safety technicians conduct annual reviews of our Professional Risk Assessments to ensure they remain current and comprehensive. The Quality System Department critically examines these assessments, and their findings are escalated to our top management. This facilitates a collaborative process, involving managers from various departments, to devise corrective actions and propose enhancements, ensuring that our occupational health and safety management system is not just maintained but continually improved.

- **Comprehensive Occupational Health and Safety Training:**

Over the past year, MEL has conducted 9 specialized training sessions on health and safety, benefiting 90 of our employees. These trainings are tailored to the specific roles of our employees, encompassing a range of topics from the safe operation of forklifts and cranes to the effective use of personal protective equipment. Our goal is to equip every team member with the knowledge and skills necessary to maintain a safe working environment.



- **Enhanced Worker Health Promotion Programs:**

MEL is committed to the holistic well-being of our employees. We provide an extensive medical program that offers advanced benefits not only to our employees but also to their families. This program facilitates access to private healthcare services, ensuring our team members receive the best possible medical care for their needs.

- **Proactive Approach to Health and Safety Impact Mitigation:**

Our proactive approach to mitigating potential health and safety risks associated with our operations is exemplified by our on-site company doctor. Regular workplace examinations and health check-ups are conducted for all employees. Additionally, our Health and Safety Committee plays an instrumental role in discussing and implementing necessary improvements within the company.

- **All-Inclusive Occupational Health and Safety Management System:**

MEL's occupational health and safety management system covers 100% of our employees, including those whose work or workplace is under our control. This comprehensive system undergoes both internal audits and external certifications to ensure its efficacy and adherence to high standards.

- **Work-Related Injury Statistics and Prevention:**

In terms of work-related injuries, MEL reports zero fatalities and high impact injuries over a total of 431,429 hours worked by workers during the reporting period. There were six recordable work-related injuries caused by omissions. For employees not working under our control, there were no recordable work-related injuries or deaths. This achievement reflects our strong emphasis on identifying hazards and managing risks, ensuring the safety of all individuals in our operational area.

MEL is steadfast in its commitment to creating a safe, healthy, and supportive work environment. Our comprehensive approach to health and safety training, employee wellness programs, and risk management strategies is a reflection of our dedication to the welfare of our employees and the broader community. Through these efforts, we not only uphold but continuously strive to elevate the standards of occupational health and safety in our industry.



### 5.3.1 Health and Safety Policy

In the Health and Safety Policy, MEL highlights its transition from the OHSAS 18001: 2007 to the more advanced ISO 45001:2018 standard. This transition signifies a key step in enhancing our Occupational Health and Safety Management System, reflecting our ongoing commitment to the wellbeing of our employees, who are undoubtedly our most valuable asset.

By adopting the ISO 45001:2018 standard, MEL sets a robust framework for the operation of our company, with a keen focus on continually ensuring optimal conditions for the health and safety of our employees. This dedication not only boosts employee productivity but also satisfies the expectations of all stakeholders associated with our company.

MEL's management is committed to taking all necessary steps to prevent workplace accidents and occupational diseases. This commitment involves identifying both risks and opportunities for improvement in health and safety, as well as our existing systems. Our ultimate goal is to foster a safe working environment where our employees can comfortably and securely perform their duties. This includes implementing measures to ensure the safety of not only our employees but also visitors and contractors within our facilities.

Prioritizing the elimination of workplace hazards, MEL undertakes necessary technical inspections where equipment replacement is not feasible, highlighting potential dangers and providing essential personal protective equipment to those exposed to risks.

Furthermore, MEL's management pledges to comply with all national and European legislative requirements and regulatory standards related to occupational health and safety. Our adherence to the principles of the ISO 45001:2018 standard is a testament to our ongoing efforts to improve our system's performance through both quantitative and qualitative goals.

In this endeavor, we encourage the active participation of all employees, who can contribute their suggestions through their representatives on the Occupational Health and Safety Committee. This collaborative approach is a cornerstone of MEL's commitment to continuous improvement in health and safety performance, ensuring a secure and healthy workplace for everyone involved in our operations.



### 5.3.2 Health and Safety Committee

(403-4)

Our Health and Safety Committee is a reflection of our ongoing commitment to employee wellbeing, embodying our belief in the power of collaborative and proactive health and safety management. At MEL, we recognize that our employees are our most valuable asset and that their safety and health are of paramount importance. The activities of our Health and Safety Committee are outlined below:

- **Dynamic Worker Engagement and Consultation:**

MEL's Health and Safety Committee is a balanced representation of our workforce and management, consisting of three employee representatives and three company members, including Human Resources, an Occupational Physician, and a Safety Technician. This diverse composition ensures a broad perspective on health and safety issues, reflecting both employee concerns and management insights.

- **Regular Meetings and Proactive Communication:**

The committee meets quarterly, providing a structured platform for discussing and addressing all matters related to employee health and safety. These sessions are critical in identifying potential risks, discussing improvements, and reviewing the effectiveness of current safety measures. The committee diligently records employee representatives' requests and communicates proposed solutions to the management team.

- **Documented Actions and Transparent Communication:**

To maintain transparency and accountability, we have established a registry account documenting actions implemented at the company and outlining future strategic moves in health and safety. Minutes from each meeting are meticulously recorded and summaries are distributed not just to the management team but also to all interested parties. This ensures that everyone, from the executive level to the shop floor, is informed and involved in our health and safety journey.

- **Future Plans and Continuous Improvement:**

These meetings and communications are more than just procedural; they are integral to our continuous improvement in health and safety. We are committed to not only addressing immediate concerns but also proactively planning for future enhancements. Our goal is to create an environment where every employee feels safe, heard, and valued.

Our Health and Safety Committee plays a pivotal role in this endeavor, embodying our commitment to an inclusive, transparent, and proactive approach to worker welfare. Through continuous dialogue, collaboration, and action, we strive to not only maintain but continually elevate our standards of occupational health and safety.





### 5.3.3 Emergency

MEL places a strong emphasis on emergency planning as a crucial aspect of maintaining a secure and hazard-free workplace. We identify risks and opportunities that should get managed to prevent or eliminate unwilling effects, as well as to ensure the continuous improvement of the company. Thus, MEL applies processes that are required in order to be prepared and to face contingent emergency situations including fires, earthquakes, floods, and gas and chemical leaks. Additionally, in response to the COVID-19 pandemic, MEL has adopted and implemented specific policies under the guidance of our Human Resources department and Occupational Health Physician.

In these contexts, the company conducted in November of 2022 successful evacuation exercises. The personnel was trained to face an emergency situation and to be able to provide first aids, which are an indispensable part of the preparation. Emergency plans undergo regular review and revision to ensure continuous improvement and alignment with Occupational Health and Safety management.

Without exception of the preparation for possible emergency situations, MEL has implemented:

- A detailed Personal Protective Equipment (P.P.E.) policy, encompassing protective clothing, safety helmets or hats, eyewear, and footwear, customized to different job roles to ensure maximum protection against injuries, contamination, and other health hazards.
- Tailored safety measures in our facilities, such as:
  - Upgraded safety footwear based on job specifications.
  - Comprehensive fire safety and general and assignment safety rule training.
  - First aid training sessions.
  - Well-equipped rest areas for employee comfort.
  - A fully stocked first aid station, including updated defibrillators and additional medical supplies.
  - Enhanced security protocols for daily audits and adherence to COVID-19 measures.
  - Application of Pest Control System in the mill.
  - Training in safe computer usage and office ergonomics.
  - Specialized training for vehicle operators.
  - Proactive health measures, including vaccinations for typhoid, tetanus, hepatitis A, and other relevant health risks.
  - Regular medical check-ups for all employees, with additional screenings such as cardiac assessments for those over 40 and X-rays for shift workers.
- Comprehensive COVID-19 response initiatives, including employee education, temperature checks, provision of masks and antiseptics, and enabling telecommuting where possible.

MEL's proactive and comprehensive approach to emergency planning and response is integral to our commitment to safeguarding the health and safety of our employees. By continuously updating and refining our policies and practices, we strive to create a work environment that is not only safe but also responsive to the evolving needs and well-being of our team.



## 5.4 Community Support

(GRI 3-3)

MEL is dedicated efforts towards community welfare and employee engagement in social causes. The Association of Voluntary Blood Donors of MEL Employees, established in 2017 through the collaborative efforts of our Human Resources Department, Occupational Physician, and former members of the Health & Safety Committee, stands as a testament to this commitment.

Biannually, the Human Resources Department at MEL organizes voluntary blood donation drives within our facilities, in collaboration with AHEPA Hospital. This initiative not only involves our employees but also extends to engaging and informing the Health & Safety Committee about the progress and developments of these activities. Moreover, all staff members are kept abreast of related matters, fostering a culture of awareness and participation.

Notably, these efforts have led to the creation of a blood bank, a crucial resource that benefits not just our employees but also their families, ensuring their health and wellbeing.

A highlight of our social responsibility activities was on August 30, 2022, when MEL employees came together in a significant number to voluntarily donate blood. This gesture supported the National Blood Donation Center, directly aiding individuals in need of blood donations, whether due to medical conditions or emergencies.

Moreover, understanding the growing significance of sustainability, MEL actively supports and encourages educational initiatives that promote recycling, resource conservation, energy efficiency, and overall planetary protection.

The concept of transforming what was once considered 'waste' into valuable raw materials is at the heart of our mission. Circular economy, a revolutionary economic model, minimizes waste and maximizes resources, creating immense value for the ecosystem. This approach not only contributes to environmental balance but also strengthens the economy and drives sustainable development. Educating future generations about these crucial issues is a responsibility we at MEL take very seriously.

Starting November 1, 2022, we reopened our facilities to welcome young minds into the world of recycling. Our goal is to provide them with hands-on experience of the recycling process, helping them understand its significant 'green' impact on the environment and the economy. Through these interactive visits, we aim to inspire and educate the next generation about the importance of sustainable practices and the role they can play in preserving our planet. At MEL, we believe in not only practicing sustainability in our operations but also in spreading awareness and fostering responsible environmental stewardship among our community, especially the youth.



### 5.4.1 Donations to Local Communities (GRI 203-1)

Our commitment extends beyond our gates. We have made substantial contributions to local communities, supporting their development and operational needs. These donations reflect our dedication to being a responsible and supportive corporate citizen. Additionally, our commercial contributions to newspapers and transfer companies illustrate our commitment to fostering strong partnerships and supporting local businesses.

The donations and support we provide to local communities have had a positive impact, aiding in their growth and sustainability. We are mindful of the influence our operations and contributions have on local economies and strive to ensure that our impact is beneficial and constructive. Our engagements and contributions are predominantly in-kind, reflecting our approach to providing practical and direct support to our communities and partners.

The total contributions made by the company in the last three years in the framework of MEL's Corporate Social Responsibility (CSR) program are as follows:

2020	2021	2022
€22,274.65	€23,806.97	€28,079.20



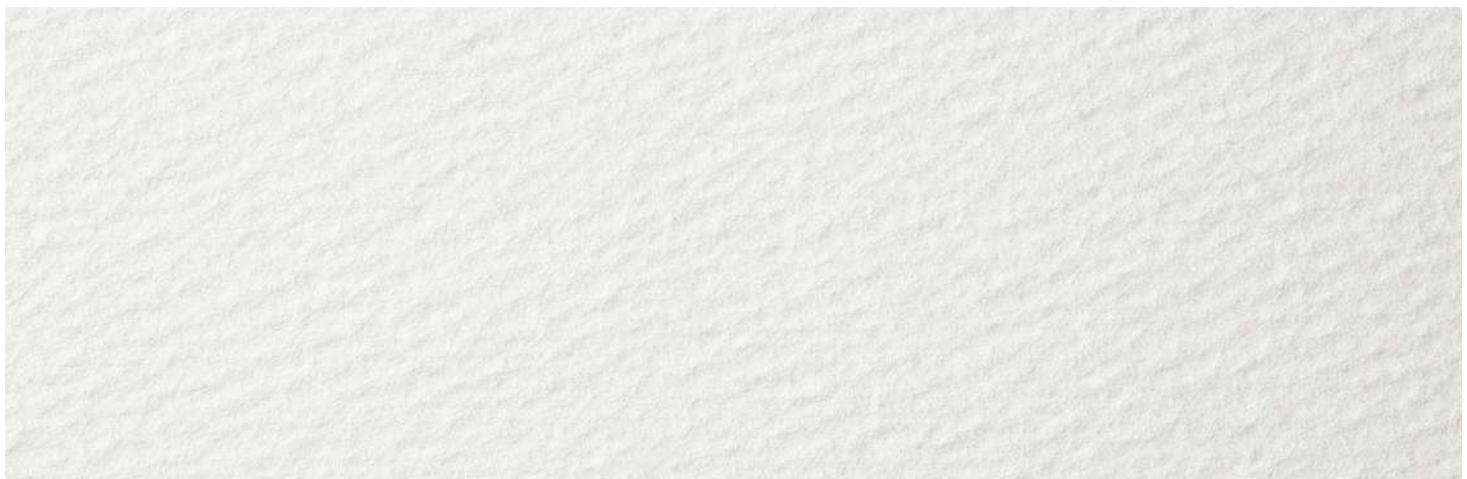
## 6. Governance



Specializing in the production and marketing of recycled packaging paper using recyclable materials, our robust framework of governance is reflective of our commitment to sustainability and responsible business practices.

Emphasizing transparency, accountability, and ethical management, MEL's governance structure is designed to uphold high standards across all areas of our business. Recognizing the value of effective governance, MEL is focused on maintaining and enhancing systems and practices that meet industry standards and exemplify corporate responsibility.

Key elements of our governance, including our organizational structure, the role of the Board of Directors, the implementation of a whistle-blowing system, adherence to regulatory compliance, and data protection policies, are essential to our operational integrity. These components underscore MEL's commitment to conducting business with integrity and in a manner that aligns with our goals for sustainable and ethical operations. Through this approach, MEL endeavors to maintain a governance model that supports our business objectives while aligning with our values of sustainability and social responsibility.





## 6.1 The Board of Directors

(GRI 2-9, 2-11)

The Board of Directors, with its diverse expertise and commitment to sustainability and corporate responsibility, steers MEL towards continual growth and success. As the largest paper recycling and cardboard manufacturing company in our region, the guidance and oversight provided by our Board are pivotal in maintaining our position as an industry leader and in upholding our commitment to environmental stewardship and ethical business practices.

The company is being overseen by a Managing Director who is appointed and monitored by the Board of Directors. The Board of Directors is the primary decision-making body responsible for guiding MEL's impacts on the economy, environment, and society. It consists of 8 members, including 1 President, 1 Managing Director, and 6 other members. This diverse group comprises both executive and non-executive members, ensuring a balanced and comprehensive approach to governance. The composition of the Board reflects our commitment to diversity, with 6 male and 2 female members contributing their unique perspectives and expertise.

Additionally, the Chair of the Board also holds a significant executive role within the organization, demonstrating our leadership's involvement in the company's operations. The Chairman's extensive experience is further enhanced by his position as Co-Vice Chairman in another company within the PAK Group, Kartonsan Karton Sanayi. This dual role brings valuable insights and leadership skills to MEL, bolstering our strategic direction and governance practices.

The Composition of the Board of Directors of MEL is as follows:

Full Name	Position in the Board of Directors
Mr. Süleyman Kaya	Chairman
Mr. Dimitrios Theocharis	Managing Director
Mr. Mehmet İmregün	Member of the Board of Directors
Mr. Ünal Bozkurt	Member of the Board of Directors
Mrs. Hatice Canan Pak İmregün	Member of the Board of Directors
Mr. Muzaffer Incekara	Member of the Board of Directors
Mrs. Funda Duran	Member of the Board of Directors
Mr. Georgios Georgiadis	Member of the Board of Directors



### 6.1.1 Board of Directors Nomination Process

(GRI 2-10)

At MEL, our Board of Directors (BoD) are not only leaders in their fields but also embody our company's values and vision. The process of nominating members to our BoD is a testament to our commitment to excellence, transparency, and governance.

The journey to becoming a member of MEL's BoD begins with a comprehensive internal screening process. Prospective members are required to submit their curriculum vitae (CV), detailing their qualifications, experience, and suitability for the role. This submission is the first step in a thorough evaluation process that ensures only the most capable and aligned individuals are considered for board positions.

Once applications are received, they undergo a detailed review by the existing members of the Board. This step is crucial, as it allows for a thoughtful assessment of each candidate's potential contribution to the Board's collective expertise and decision-making capabilities. Following this review, a detailed report is prepared and presented to the shareholders at the General Meeting. This meeting is a pivotal moment, as it is here that the shareholders, as the ultimate decision-making body, vote on the election of the new board member.

It's important to highlight that our Board conducts a collective evaluation of its members at the end of each management term. This reflective practice, mandated by National Law 4548/2018's Article 108, involves preparing a comprehensive report that assesses the Board's performance and contributions. This report, alongside the overall management report, is submitted to our shareholders, ensuring accountability and continuous improvement in our governance.

Additionally, our Board members are entrusted with the responsibility of proposing candidates for replacements or new directorial roles. This process is always carried out in strict adherence to the Company's statutes, ensuring that our governance remains robust, fair, and in line with our organizational ethos.

We are committed to a nomination process that is not only rigorous and transparent but also aligned with our values and strategic objectives.

## 6.1.2 Organizational Structure

(GRI 2-9)

At MEL, we firmly believe that a well-defined organizational structure is the cornerstone of any successful company. Our organizational framework is meticulously crafted to ensure clarity in roles and responsibilities, enabling every team member to contribute effectively towards our collective goals.

MEL's organizational structure is designed to be both streamlined and flexible, allowing us to adapt to the dynamic business environment. This agility is crucial in maintaining our competitive edge and aligns perfectly with our broader mission of sustainable growth and innovation.


In our structure, every position, from entry-level roles to senior management, is clearly defined with specific responsibilities and tasks. This clarity ensures that all employees understand their contributions to MEL's success and are empowered to perform at their best. We place a strong emphasis on adherence to our high standards and practices, which are central to maintaining our reputation for quality and integrity.

Furthermore, our organizational design facilitates communication and collaboration across different departments. This interconnectedness is vital for fostering a cohesive work environment where ideas and strategies are shared openly, leading to improved decision-making and problem-solving.

At MEL our organizational structure is more than a mere arrangement of roles; it's a reflection of our values and our vision for the future. It supports our pursuit of excellence in every endeavor, ensuring that we remain at the forefront of our industry and continue to set benchmarks in sustainability and innovation.

ORGANIZATIONAL CHART MEL





## Governance

### 6.2 MEL's Governance and Accountability Framework

(GRI 2-12, 2-13, 2-14, 2-17)

At MEL, we embrace our role as a company that implements sustainable business practices, demonstrating our commitment to positively impact the economy, environment and society. The pinnacle of our governance structure, the Board of Directors, thoroughly assigns responsibility for managing the multifaceted impacts of our organization.

Under the guidance of our CEO, MEL has established a number of robust policies, designed to address key areas: environmental management, quality assurance, workplace health and safety and energy efficiency. Complementing these policies, MEL has developed comprehensive manuals integral to the Quality, Energy, Environment and Health and Safety Management Systems. These manuals describe the responsibilities of managers and supervisors in clear terms. Every manager, whether in production, engineering, human resources, finance or supply chain, is empowered and obliged to proactively manage the impacts in their respective areas.

MEL's approach is a testament to our belief that effective impact management is not the responsibility of a single person or department but a collective effort. Each manager at MEL carries the mantle of responsibility, ensuring that every operational aspect of their department not only aligns with but also advances our overall sustainability goals.

The Board of Directors is entrusted with the critical responsibility of crafting the company's vision and strategic plan. This plan forms the foundation upon which all company operations are based. It involves strategic planning, approving allowable expenses, and green-lighting developmental projects in line with our overarching goals.

The role of our highest governance body extends to overseeing the company's due diligence and other processes crucial for managing MEL's impact. This includes monthly monitoring activities, involving comprehensive report completion and analysis of key indicators crucial for the company's performance. These indicators help in decision-making processes, leading to meetings where results are dissected, and future courses of action are planned, including implementing improvements based on the gathered data.

Moreover, the top management assumes the ultimate responsibility for reviewing and making necessary changes to ensure the smooth operation of the company. This includes considering the outcomes of various processes and making decisions that align with MEL's mission to operate efficiently and sustainably.





Regarding reporting mechanisms, our senior executives and employees regularly update the highest governance body. Environmental issues are reported monthly and as needed, ensuring timely and informed decision-making.

Our highest governance body also plays a crucial role in sustainability reporting. They are tasked with reviewing and approving all relevant information. This process involves a review by the top management's personal assistant, who ensures that all documents meet our stringent standards before approval. This iterative process continues until complete satisfaction is achieved. In instances where requests pertain to the HR department or involve significant supply expenses, specific protocols are followed to ensure thorough evaluation and appropriate approval.

In case of a request for supplies, if it exceeds the amount of €1,000, approval is necessary from the top management. The request is sent to the supply department electronically and the supply department is forwarding it to the top management for approval and signatures. Whether the application has been approved or not, the request is returned to the supply department and it takes care of the rest of the procedure.

In cases where top management approval is not required, it reflects our trust in the department managers' competence and authority, particularly for minor supply requests (e.g. the cost of the supply is below €1,000).

Lastly, to enhance the collective knowledge and skills of our governance body in sustainable development, we actively engage in internal and external seminars and conferences. This ongoing education ensures that our leadership remains at the forefront of sustainability practices.

Our structured governance, combined with a culture of continuous learning and accountability, positions us as a leader in sustainable development, truly embodying the principles we stand for.



### 6.3 Evaluation of the Highest Governance Body

(GRI 2-18)

At MEL, we are committed to a thorough and transparent evaluation of the performance of our highest governance body, ensuring its alignment with our strategic objectives and its impact on the economy, environment, and society.

The key aspects of our strategy are integral to our company's success, and therefore, the performance of our highest governance body is evaluated in this context. This body is responsible for ensuring compliance with legal requirements, and adherence to our company policies and procedures. Our evaluation process involves a comprehensive review of how these responsibilities are executed, ensuring that our governance body effectively oversees the company's management and its impacts.

The evaluations of our highest governance body are conducted continuously, aligning with our company's strategy. These evaluations are designed to be independent to ensure objectivity and are carried out regularly. This ongoing assessment ensures that our governance practices remain dynamic and responsive to the evolving needs of our business and stakeholders.

Following these evaluations, MEL is in the position to make any necessary changes in the composition of our highest governance body and our organizational practices. These changes are made with a focus on enhancing the company's performance and aligning with our strategic vision. This proactive approach ensures that our governance body is not only compliant but also innovative and forward-thinking, adapting to the changing business landscape.

Our approach to evaluating the performance of our highest governance body is a reflection of this commitment, ensuring that we remain a leader in sustainable practices and corporate governance. We believe that this rigorous evaluation process is essential for our continuous improvement and for making a positive impact on our stakeholders and the world at large.



## 6.4 Regulatory Compliance & Business Ethics

(GRI 3-3, 2-16, 2-23, 2-25, 205-3)

MEL adheres to the highest standards of legal and ethical practice, ensuring that every aspect of our business is conducted with integrity and responsibility. Our proactive approach in this area not only protects our reputation, but also strengthens our position as a company with sustainable and compliant business operations. Through this commitment, we continuously strive to create a positive impact on our stakeholders and the environment, reflecting our deep-rooted values of excellence and reliability. It is worth noting that for the reporting year there were no confirmed incidents of corruption. The mechanisms we use to address these vital aspects of our business are detailed below as follows:

- **Effective communication of critical concerns**

MEL ensures that any critical concerns are communicated to our highest governance body in a timely and effective manner. This is achieved through a variety of channels, including online meetings, emails and phone calls, ensuring our leadership is always informed and responsive to pressing issues.

- **Diligent procedures to remediate negative impacts**

In our commitment to remedy any negative impact, MEL adheres to the guidelines set out in our Quality System Policy 9001:2015. This policy serves as the cornerstone of our approach to identifying and addressing any adverse impacts our activities may have.

- **Anti-Violence and Harassment Policy**

The company has implemented an Anti-Violence and Harassment Policy, aligning itself with international standards, focusing on eradicating workplace violence and harassment, including gender-based and sexual harassment. It prohibits behaviors hindering employment and aims to challenge the misconception that harassment is inevitable. The policy creates a supportive climate, breaks the secrecy around violent behaviors, and provides resources to address harassment. Additionally, the company is committed to protecting employees who may be victims of domestic violence, reflecting its dedication to a sustainable and responsible business culture.

- **Complaint handling and customer satisfaction**

MEL has implemented a structured process, code D142, dedicated to dealing with customer complaints and measuring customer satisfaction. Our Quality team meets monthly to review these complaints, ensuring that each concern is thoroughly assessed and addressed. This process includes detailed complaint traceability, allowing us to provide personalized and effective responses to our customers. In addition, when necessary, MEL is ready to recall products, thanks to our advanced manufacturing software that allows for accurate tracking.

- **Customer engagement and feedback mechanisms**

We understand the importance of stakeholder feedback to improve our services. To this end, MEL conducts annual Customer Satisfaction Surveys, gathering valuable information on the quality of our products and services. Our sales managers also play a critical role as they regularly communicate with customers to discuss their needs and any challenges they may be facing. These interactions are critical to shaping our strategies and offerings.

- **Monitoring and Improving Grievance Mechanisms**

MEL's commitment to continuous improvement is reflected in our rigorous internal control procedures, which include regular evaluations of our processes. The effectiveness of our complaints mechanisms is assessed through feedback from annual customer satisfaction surveys and evaluations from the Quality Systems department. In addition, our real-time production software and Quality Control's finished product checks ensure that our processes are continuously monitored and improved. In cases of non-compliance, MEL follows the "D141" process, which includes recording issues and implementing corrective actions, which are monitored through internal audits by the Quality Systems Department.

MEL's approach to regulatory compliance and stakeholder engagement is characterized by a proactive and responsive framework. We are committed to maintaining the highest standards of corporate responsibility and stakeholder satisfaction, ensuring that our operations not only comply with regulatory requirements but also align with the expectations of our stakeholders. Our continuous improvement in these areas is a testament to our commitment to excellence and sustainability.

### 6.4.1 Conflicts of Interest

(GRI 2-15)

At MEL, we are dedicated to maintaining the highest standards of integrity and ethical practices. Our commitment to sustainability is evident in our robust procedures for preventing and mitigating conflicts of interest. This is crucial for ensuring the trust and confidence of our stakeholders and for the long-term success of our company.

To ensure the prevention of conflicts, MEL has established clear guidelines through our work regulations, procedures, and policies. These guidelines are communicated effectively to all members of our organization, from the highest levels of governance to our valued employees. This communication is continuous and is integral to maintaining a high standard of conduct both within and outside the organization. By doing so, we foster a culture of transparency and accountability.

MEL believes in the importance of transparency with our stakeholders. We have an internal process in place to document any potential conflicts of interest. This includes, but is not limited to, conflicts arising from cross-board memberships. Stakeholders have the opportunity to report any concerns from their perspective, and our company, through its skilled executives, addresses and resolves these conflicts effectively. This open approach ensures that all parties are heard and that conflicts are resolved in a fair and transparent manner.

In terms of conflicts related to cross-shareholding with suppliers and other stakeholders, MEL ensures that there is always clear and timely communication. This proactive approach prevents potential conflicts and ensures proper management of relationships. The company continuously evaluates and appreciates the dynamics and facts of each situation, allowing us to adjust our collaboration strategies accordingly. This adaptability is key to maintaining healthy and productive relationships with all our partners.

## 6.4.2 Whistleblowing System

(GRI 2-15)

At MEL, we uphold a culture of transparency and accountability, which is exemplified through our comprehensive whistleblowing system. Spearheaded by our Human Resources department, this system plays a critical role in maintaining the ethical standards and operational excellence for which MEL is renowned.

Whenever there are occurrences of operational malfunctions or instances of unprofessional conduct within the company, our process ensures that these issues are addressed swiftly and fairly. Supervisors are tasked with documenting any such incidents in a detailed report, which is then submitted to the Human Resources department. This procedural step is integral to our commitment to an open and honest work environment.

Upon receipt of the report, the Human Resources department takes the necessary steps to keep the Management team informed. Simultaneously, the involved employee is provided with the report and given the opportunity to submit a written response within a three-day timeframe. This response is critical in providing a comprehensive view of the incident and ensuring that the employee's perspective is considered in the decision-making process.

The supervisor, upon reviewing the employee's response and evaluating the facts of the case, determines the appropriate course of action. This may include the imposition of a penalty if deemed necessary, a decision which is communicated back to the Human Resources department. The Human Resources team then has the responsibility of not only informing the Management team but also of conveying the decision to the employee involved and implementing the penalty.

Crucially, the entire whistleblowing process is meticulously recorded and documented within our company's system. This documentation ensures that there is a clear and traceable record of actions taken, reinforcing the integrity and transparency of our procedures.





### 6.4.3 Remuneration Policy

(GRI 2-19, 2-21)

We comply rigorously with legal standards and openly declare the monthly fixed and variable pay for members of our highest governance body and senior executives. This transparency is a cornerstone of our ethical approach, ensuring all stakeholders are informed about our compensation practices.

MEL follows a policy of complete transparency in declaring termination payments, strictly adhering to legal requirements. Additionally, all remuneration and retirement benefits for our senior staff are accurately recorded in the payroll and financial statements, in accordance with our operational agreements. This ensures a responsible and respectful approach to employment transitions.

Our remuneration policy is intricately linked to the performance and objectives of our senior executives, especially concerning their impact on the economy, environment, and society. This alignment ensures that our leadership is motivated not only by financial incentives but also by our company's strategic goals and sustainable development.

The annual total compensation ratio of MEL's highest-paid individuals to the median annual total compensation for all employees is 1:37,73. This ratio reflects our commitment to equitable pay practices.

In line with our harmonious relationship with our workforce and the agreements with our union, all employees, including the highest-paid individual, received the same percentage increase in annual total compensation. This policy exemplifies our commitment to fairness and equality in employee treatment.

MEL's remuneration policy is designed to foster a culture of transparency, fairness, and responsibility, reflecting our commitment to our employees and stakeholders. Our approach to compensation is aligned with our strategic objectives and sustainability goals, ensuring that we remain a responsible and forward-thinking organization.



## 6.5 Customer Privacy & Data Protection

(GRI 3-3, 418-1)

MEL has maintained an exemplary record of protecting customer data. During the reported period, the total number of substantiated complaints received regarding violations of customer privacy was zero. This includes complaints received from external parties as well as complaints from regulatory bodies. Furthermore, there have been no cases of leaks, thefts or losses of customer data.

We have implemented comprehensive security measures and regular audits to ensure that all customer data is treated with the utmost care and confidentiality. Our team is constantly trained in the latest data protection protocols, ensuring they are equipped to maintain the high standards we set.

At MEL, we understand that customer trust is fundamental to the success of our business. As such, we are committed to complying with data protection regulations, to ensure that our customers' privacy and data are protected at all times. Our zero-tolerance approach to data breaches and our proactive measures to safeguard customer information are central aspects of our commitment to operational excellence and ethical business practices. This commitment to data protection not only strengthens our reputation but also strengthens the trust our customers place in us.



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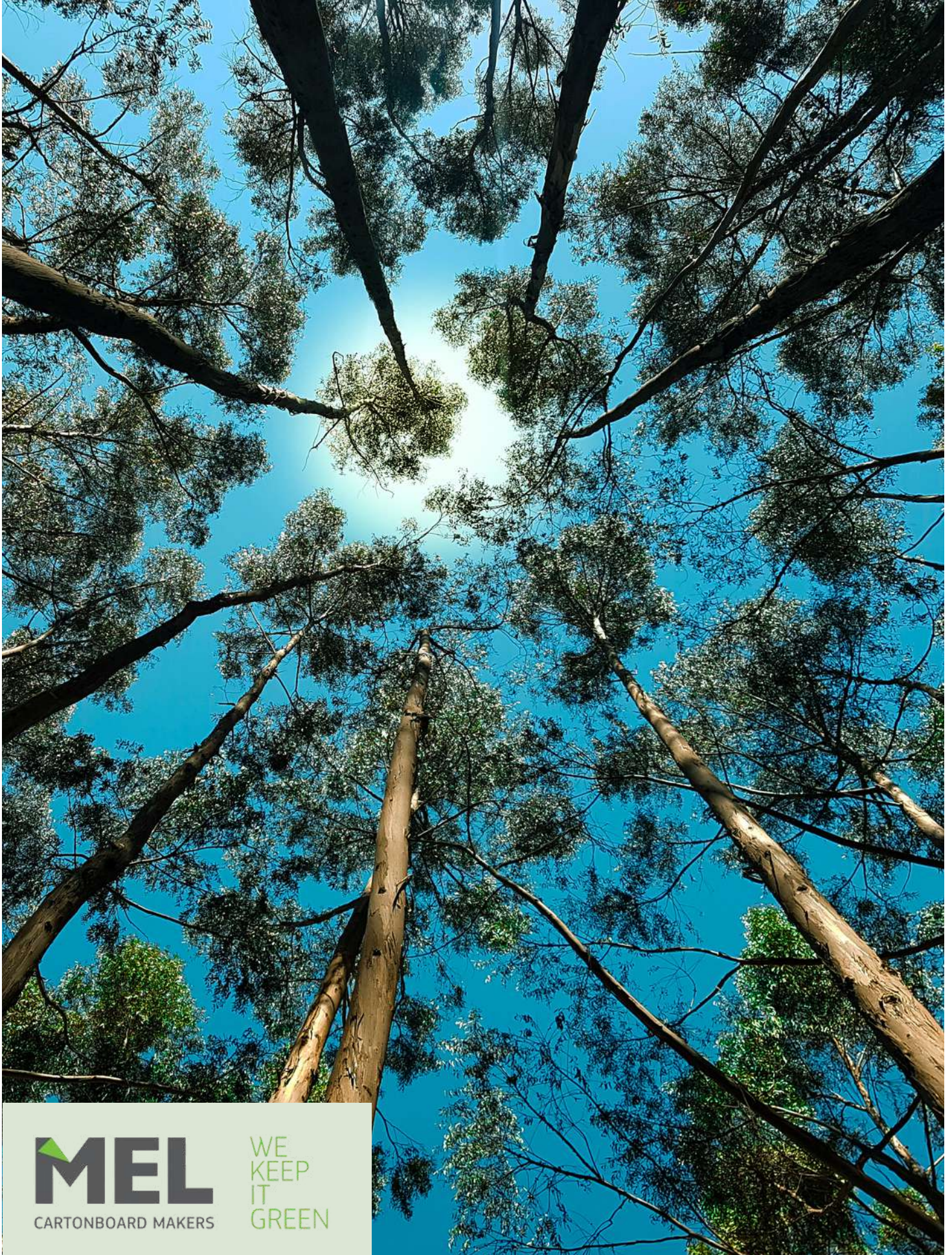
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