

HARTMANN



ENVIRONMENTAL STATEMENT 2022

PAUL HARTMANN SA

HARTMANN GROUP production center located in
Mataró (Barcelona)



Review 2. June 2023

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1. LOCATION AND ACTIVITY

Hartmann history



- 1934:** Beginning of Laboratorios UNITEX S.A. (Mataró).
- 1988:** The HARTMANN GROUP (with head office in Germany) bought the Company which was named Laboratorios UNITEX-HARTMANN S.A.
- 1995:** Laboratorios UNITEX-HARTMANN S.A. began its activity with headquarters located in the “Polígono industrial Pla d’en Boet” (Mataró).
- 2003:** The company in Spain was segregated in two independent companies, the production filial PAUL HARTMANN S.A. and the commercial and distribution filial which maintained the old name, Laboratorios UNITEX-HARTMANN S.A.
- 2008:** The commercial and distribution entity changed its name to Laboratorios HARTMANN S.A.
- 2017:** The HARTMANN GROUP acquires a new incontinence factory that joins HARTMANN Spain. The new company, located in Montornés del Vallés, is renamed Paul Hartmann Iberia S.A.
- 2020:** Investment in new silicone adhesive technology (Orion project)
- 2021:** Launch of ranges developed with silicone (Cosmopor® Silicone and Omnifix® Silicone)
- 2022:** Project HAO: production transfer to Mataró of ranges Atrauman® Silicone, Hydrofilm® and Omnistrip®

1. LOCATION AND ACTIVITY

Location

PAUL HARTMANN S.A. (PHSA, hereafter) and Laboratorios HARTMANN S.A. share facilities.

Location: Polígono Industrial Pla d'en Boet II (Mataró Sur), near the Mediterranean sea, 40 minutes away from the Barcelona airport and well communicated by highway C-32.

10.300m² building integrating: production plant, offices, raw materials warehouse, maintenance workshop and laboratory.

The ambit of the EMAS registration specifically includes the company PAUL HARTMANN S.A. (registration number ES-CAT-000113) with scope: *Design, development and production of medical devices for wound treatment (strips, wound-plasters and fixation tapes).*



1. LOCATION AND ACTIVITY

Our products

PHSA, is included in the CNAE 2120 group, is the centre of competence, development and production of adhesives for the HARTMANN GROUP.

Adhesive strips and plasters from the Dermoplast®/Cosmos®/Tiritas® ranges, plasters from the Omni® range and medical dressings such as the Cosmopor E® range, or new dressings with silicone technology, among others.

Laboratorios Hartmann S.A. markets in Spain the products manufactured in Mataró and in other companies of the HARTMANN GROUP. The basic distribution channels are: Pharmacy, Hospitals and Primary Care Centers.

In 2022, almost 50 million product units (49.916.731) were manufactured in Mataró. This value is used as a production baseline in the indicators evaluated.



2. ENVIRONMENTAL MANAGEMENT SYTEM

Principles



Basic principles: Respecting the environment and prevention of pollution. Under these principles are structured our process, installations and objectives.

Sustainable company: We work under a socially responsible ethic with the environment, customers, suppliers, society, employees and collaborators.

Continuous improvement: Systematic evaluation of our processes: control of indicators, measurement of results obtained, definition of objectives, action plans...

Compliance with legislation: The legal compliance of our employees as well as voluntarily accepted commitments are a basic practice of our behavior. We ensure and promote the legal compliance of our suppliers and subcontractors.

Our customers as the key to proactive development: Our products are developed with the aim of meeting the needs of our customers, assessing environmental repercussions and working to minimize their environmental impact.

2. ENVIRONMENTAL MANAGEMENT SYSTEM

Certifications

The company is committed to an integrated policy of quality, environment, occupational health and safety, and corporate social responsibility, valid for all 3 companies of the HARTMANN GROUP companies in Spain.

PHSA, certified company:

- Certificate ISO 9001:2015
- Certificate ISO 13485:2016
- Certificate ISO 14001:2015
- Certificate REGLAMENTO N°1221/2009 EMAS III
- Certificate ISO 45001:2018
- Certificate ISO 14064:2019

This Environmental Statement is prepared in compliance with the provisions of Regulation (EC) No 1221/2009 of November 25, 2009; Regulation (EU) 2017/1505 of August 28, 2017; and Regulation (EU) 2018/2026 of December 19, 2018.



2. ENVIRONMENTAL MANAGEMENT SYSTEM

Integrated Policy

IMM PHES



Política Integrada de Calidad, Medio Ambiente, Seguridad y RSC

Documento: **MAN-M1.3-01 PHES**
Anexo 3
Versión: 7.0



Política del Sistema Integrado de Gestión preparada en base en **HARTMANN Quality Policy**:

Calidad respalda la estrategia para convertir a HARTMANN y sus divisiones de negocios en líderes en el cuidado de la salud. Nos aseguramos de que nuestros productos y soluciones tradicionales, modernos y digitales satisfagan las expectativas de nuestros clientes y cumplan con todos los requisitos normativos y legales aplicables a través de nuestro sistema de gestión de calidad eficaz y eficiente, en toda nuestra organización global. HARTMANN Ayuda. Cuida. Protege.

Pilares del Sistema Integrado de Gestión de HARTMANN España:

HARTMANN España es un reconocido fabricante y distribuidor de productos sanitarios y otros productos para el cuidado de la salud, a través de tres sociedades legalmente constituidas: PAUL HARTMANN S.A (PHSA) y LABORATORIOS HARTMANN S.A. (LHSA) en Mataró y PAUL HARTMANN IBERIA S.A. (PHISA) en Montornés del Vallés. El portfolio de productos HARTMANN, que distribuye LHSA a los pacientes, profesionales de la salud, mayoristas, farmacias, hospitales, residencias y consumidores, se fabrica en las distintas plantas del Grupo HARTMANN. Estamos sujetos a muchas normas nacionales e internacionales, establecidas para proteger la seguridad y mejorar la salud y el bienestar de los pacientes, profesionales de la salud así como medio ambiente y nuestro entorno laboral y social.

En línea con nuestro Código de Conducta Corporativo, la Política Integrada de HARTMANN España está diseñada para:

- Alcanzar la excelencia en la Seguridad, Medio Ambiente y Calidad y cumplimiento a través de una cultura de responsabilidad teniendo en cuenta los requerimientos y expectativas de las partes interesadas.
- Garantizar el cumplimiento legal en materia de seguridad y salud laboral, ambiental y calidad de nuestros productos y procesos, locales e internacionales de aplicación, así como los compromisos voluntariamente aceptados y acuerdos específicos con las partes interesadas.
- Mantener un sistema integrado de gestión apropiado, basado en los riesgos del producto y proceso, con el fin de garantizar la seguridad de los pacientes y usuarios y de la misma forma velar por la eliminación de peligros y reducción de riesgos para la seguridad y salud en el trabajo, previniendo posibles daños y deterioro de la salud de los trabajadores así como minimizando el impacto de nuestra actividad en el medio ambiente (HARTMANN for Future strategy).
- **No enviar sus residuos a vertedero, distinguiéndose con un modelo exigente de gestión que evita el tratamiento en vertedero de los residuos generados en sus instalaciones de Mataró y Montornés, consiguiendo reciclar, reutilizar o valorizar el 100% de los residuos generados.**
- Cubrir todos los requisitos necesarios de las normas EN ISO 9001; EN ISO 13485; 21 CFR 820; EN ISO 14001, EMAS, ISO 45001, ISO 14064, así como los requisitos legales conforme los reglamentos European Directive 93/42/EEC y European Regulation 2017/745 (MDR), buenas prácticas identificadas y otras necesidades del sistema de gestión integrado.

- Tener una cultura de mejora continua evaluando nuestros procesos de forma sistemática a través de los indicadores definidos que nos permiten conocer sus riesgos y oportunidades y valorar la eficacia del sistema de gestión.
- Tener como principal objetivo la satisfacción de nuestros clientes en todos los productos y servicios velando por un desarrollo sostenible, prevención de la contaminación y minimizando el posible impacto que pueda derivarse de su utilización durante todo el ciclo de vida, así como de nuestra actividad industrial, utilizando los recursos eficientemente.
- Formar, desarrollar, capacitar, consultar y hacer partícipes a nuestros colaboradores con el fin de cumplir con sus funciones y tener éxito en su desempeño profesional, así como contribuir en la implementación efectiva de la estrategia de la compañía.

Estos compromisos soportan la dirección estratégica de la compañía y están alineados con los objetivos de calidad y HSE documentados y revisados en la Revisión por Dirección. Las siguientes funciones definidas asegurarán la aplicación práctica de esta política de la siguiente manera:

- El Director General tiene la responsabilidad y la autoridad para la aplicación de esta política.
- El Director General y Comité de Dirección (CODIR) delegan la autoridad para aplicar dicha política al Representante de la Dirección (QMR y PRRC para MDR).
- El Comité de Dirección y Directores de Área de PHES son responsables del cumplimiento de esta política y de aplicar las medidas necesarias para ello.
- Todo colaborador de HARTMANN España es responsable del cumplimiento de esta política.

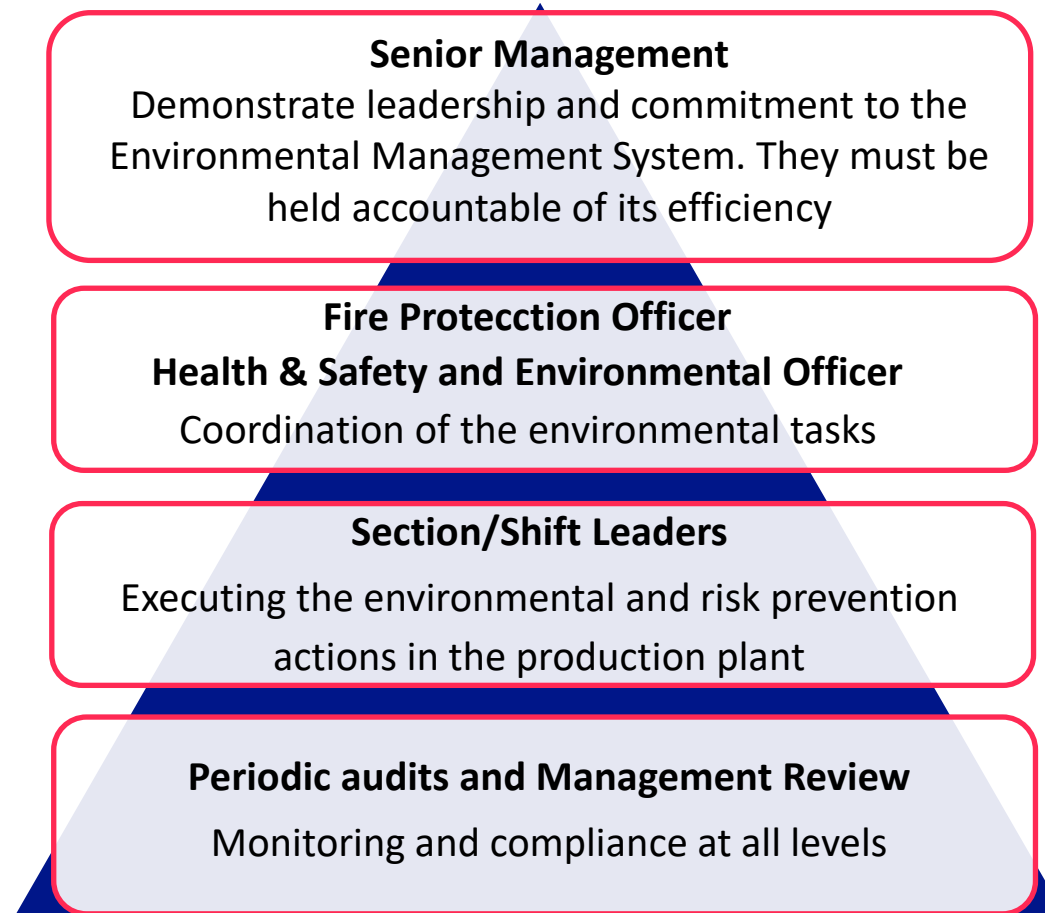
	Departamento, Función, Nombre	Fecha, Firma
Aprobado por	Managing Director HARTMANN España - Jordi Guinovart	 12.06.2023
	RAQ&HSE Director (QMR/PRRC) HARTMANN España - Pilar Molina	 12.06.2023

Archivo: MAN-M1.3-01 PHES_Anejo 3 Política Integrada Calidad y HSE_V7.docx	Documento Online. Las copias impresas no son controladas propiedad de PAUL HARTMANN Spain. Envío y copias a terceras partes sin autorización no están permitidas (sólo para uso interno).	Página 1 de 1
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2. ENVIRONMENTAL MANAGEMENT SYSTEM

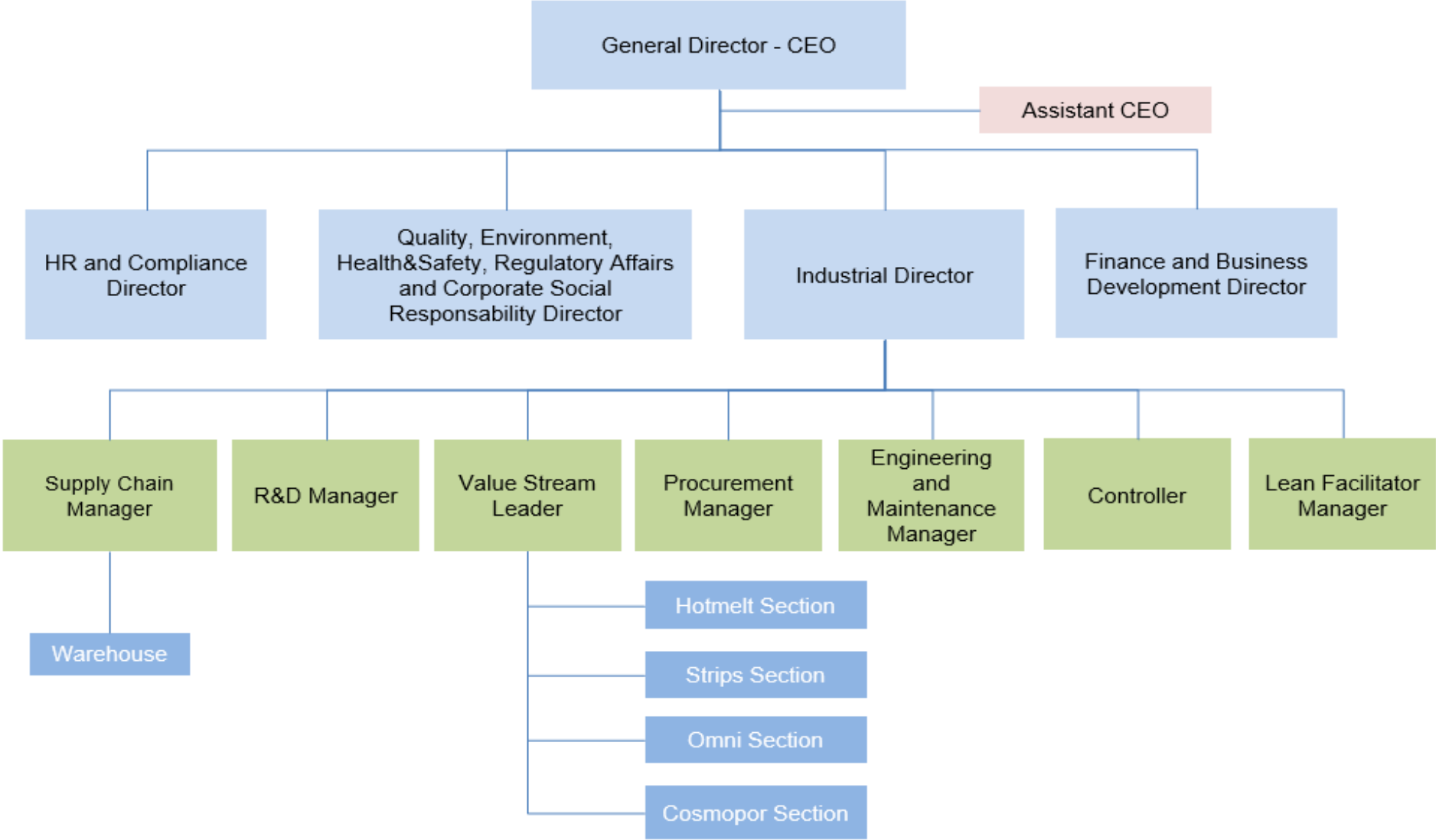
Responsibilities

Communication of responsibilities and policy to all collaborators, clients, subcontractors, suppliers and other stakeholders. Promotion of the commitment according to ISO 14001 and EMAS III Standards.



2. ENVIRONMENTAL MANAGEMENT SYSTEM

General flowchart of the company



3. ANALYSIS OF THE CONTEXT OF THE ORGANIZATION (PESTEL)

Political, Economical, Sociocultural ,Technological, Ecological, Legal Factors

P (POLITICAL FACTORS)

- War in Ukraine, energy crisis in the EU: resurgence of energy sources such as coal with significant environmental impact.
- War in Ukraine, energy crisis in the EU: different measures are established to reduce the consumption of gas and electricity with a positive environmental impact.
- Important legislative activity in environmental matters encompassed within the strategy for a Circular Economy.

E (ECONOMICAL FACTORS)

- After the end of the pandemic, the routine activity of hospitals and primary care centers returned.
- Focusing on more competitive and sustainable products (reduction of energy consumption and optimization of materials and associated costs).
- Generalized rise in the costs of raw materials, electricity and gas in 2022, with an opportunity to work on the development of processes and products, optimizing consumption and consequently reducing the associated environmental impact.
- Reform of the Spanish tax system that delves into the design of green taxation.

S (SOCIOCULTURAL FACTORS)

- Increased preference for environmentally friendly products by consumers and customers in general. Potential threat if the requirements of different stakeholders are not studied in detail (e.g. new environmental clauses in Public Sector Contracts). Opportunity for differentiation.
- Market demand for the manufacture of products free of harmful substances for the user, opportunity to demand from our suppliers of raw materials with lower environmental impact.
- Reduction in the home-office model and resumption of work trips in 2022, with an increase in associated emissions compared to the most critical years of the pandemic, 2020 and 2021.

3. ANALYSIS OF THE CONTEXT OF THE ORGANIZATION (PESTEL)

Political, Economical, Sociocultural ,Technological, Ecological, Legal Factors

T (TECHNOLOGICAL FACTORS)

- The pandemic has led to the accelerated consolidation of IT systems within the HARTMANN GROUP, as well as technology and network connectivity in general, allowing the efficient development of the home-office model.
- The current global context implies the need to promote digital transformation by working on new business models.
- The technological development of machines and equipment represents the opportunity to define more efficient processes, although this may imply a risk of technological gap and obsolescence due to lack of investment.
- The progressive development of IT tools that facilitate automated processes represents the opportunity to reduce the use of paper in our processes.

E (ECOLOGICAL FACTORS)

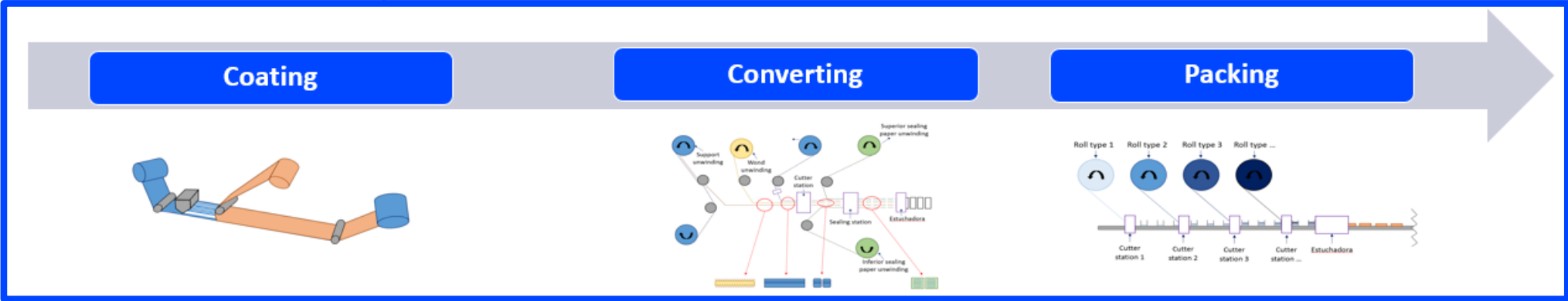
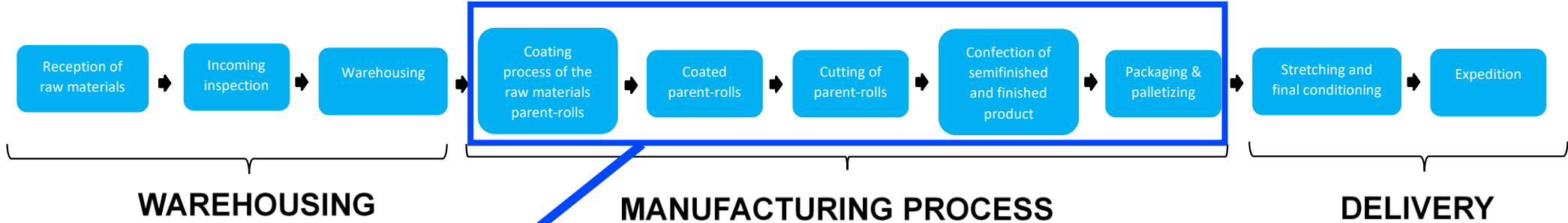
- PAUL HARTMANN S.A. is located in an eminently urban and industrial environment. Approximately 97% of the land on the plot is paved and there is a sewerage network around the all over perimeter to collect rainwater, so the impact on the soil is limited.
- The company is placed in an area of low acoustic sensitivity. Therefore, the allowed immission levels are less restrictive than in other areas.
- Location in the city of Mataró with possible effects that may be caused by climate change, with potential natural disasters.
- Widespread depletion of natural resources and continuous rise in the cost of fuels, which complicates and increases the cost of raw materials.
- Drought situation in Catalonia, need to establish measures to reduce water consumption.

E (LEGAL FACTORS)

- Promotion of the circular economy. The EU will legislate on the sustainability of products in the design phase, since 80% of the environmental impact is in this phase.
- Entry into force in 2022 of Law 7/2022, of April 8, on waste and contaminated soil for a circular economy and Royal Decree 1055/2022, of December 27, on packaging and packaging waste, with a direct impact on our activity and that of our suppliers. On March 2, 2023, Decree Law 1/2023, of February 28, was published, establishing extraordinary and urgent measures to deal with the exceptional situation in the area of the Catalonia river basin district.
- Environmental technical requirements are currently included in public tender processes. This is a risk for the awarding of contracts depending on how these requirements are proposed, and on the other hand the opportunity to strengthen the importance and commitment of the Management to the Environmental Management System.

4. DESCRIPTION OF THE PRODUCTIVE PROCESS

Control of environmental risks associated with the production process: Active prevention policy, action plans and emergency devices to respond effectively.



5. ENVIRONMENTAL ASPECTS

Areas or activities with potential environmental impact

Production area	Offices and laboratory	Subcontracted activities	Auxiliary equipment	R&D	Warehousing of raw materials
<p>Hotmelt section; Omni section; Tiritas section and Cosmopor section. Adhesive is applied to the raw material reels (paper, polyethylene, polyurethane, nonwoven) and then cut and converted into the different product ranges.</p> <p>All production sections consume energy, raw materials, hazardous substances and generate waste (banal, recyclable and hazardous). In addition, the Hotmelt section is a source of environmental noise and emissions.</p>	<p>Administrative and control activities are carried out for the production area.</p> <p>The laboratory mainly carries out physical tests. The laboratory consumes energy, paper, water, hazardous materials and generates waste (recyclable and hazardous) and wastewater.</p>	<p>Ethylene oxide sterilization of some ranges of products.</p> <p>Supply of raw materials from external warehouses, transport of finished product and waste management.</p> <p>Service providers.</p>	<p>Air compressors: Produce compressed air for normal machine operation. They consume energy and generate noise.</p> <p>Boilers: Consume energy (gas) and produce emissions.</p> <p>Air conditioning system: Conditioning of the production area and offices.</p> <p>Energy consumption.</p>	<p>Consumption of raw materials defined in the development of the product.</p> <p>Generation of waste associated with the developed product.</p>	<p>Warehouse with adequate fire protection facilities and stock management system.</p> <p>Consumption of energy, raw materials (shrink film, thermal printing ribbons) and generation of recyclable waste.</p>

5. ENVIRONMENTAL ASPECTS

All organizations, as a consequence of their activity, have an impact on the environment, generating an ENVIRONMENTAL IMPACT. Environmental Aspects are those elements of an organisation's activities, products or services that may interact with the environment. The determination of these aspects takes into account the stages of the life cycle.

Environmental aspects associated with the activities with environmental impact in PHSA:

DIRECT Environmental Aspects	INDIRECT Environmental Aspects
Raw material consumption	External waste management (general, recyclable, special waste)
Electricity and gas consumption	Emissions (CO ₂) due to transport activities
Water consumption	Consumption of ethylene oxide (Sterilization process)
Atmospheric emissions (CO ₂ , CO, COVs)	Environmental performance of suppliers and subcontractors
Noise	
Hazardous substances consumption	
Waste (general, recyclable, special waste)	
Waste water	
Paper consumption	



5. ENVIRONMENTAL ASPECTS

Evaluation of environmental aspects. Evaluation criteria

Both direct and indirect aspects are assessed on an annual basis, considering the different environmentally significant processes of the company (design and development, production areas, auxiliary equipment, warehouse, offices, raw material supply and product delivery, waste management, outsourced sterilization process and environmental performance of suppliers).

Aspects identified for abnormal operating conditions (malfunctions) and for emergency conditions (fire, explosion, spillage, etc.) are also assessed.

The main evaluation criteria used in the evaluation of **direct environmental aspects** are the QUANTITY of the aspect generated, emitted, discharged or consumed and the SEVERITY, which considers the harmful power of the aspect. Considering the partial score in each of the criteria considered as a result of the evaluation, the significant environmental aspects are obtained, those with the most relevant environmental impact, which must be considered in the establishment of environmental objectives.



5. ENVIRONMENTAL ASPECTS

Evaluation of environmental aspects. Evaluation criteria

For the evaluation of **direct environmental aspects** under normal conditions, the following evaluation criteria are used:

SEVERITY CRITERION

In the case of aspects related to energy consumption, consumption of materials and generation of waste generally present in the different processes / sections, the severity is scored considering the amount of materials / energy consumed or generation of waste associated with the specific process with respect to the total of the company.

For more specific aspects associated with specific processes, severity is scored by evaluating the impact on the environment: considering the pluviometric characteristics of the year evaluated in the case of water consumption, the values measured in relation to the legal limits and neighborhood complaints received in the case of environmental noise, toxicity of wastewater, and the requirement or not of periodic controls in the case of atmospheric emissions.

In the case of the possible environmental aspects associated with modifications in the design of the products, it is considered whether these changes affect both the quantity and the dangerousness or environmental impact of the consumed materials and generated waste (e.g., disposal components, change to recycled materials, etc.)

5. ENVIRONMENTAL ASPECTS

Evaluation of environmental aspects. Evaluation criteria

QUANTITY CRITERION

In the case of aspects related to energy consumption, water consumption, material consumption and waste generation, this criterion is scored considering the amount of materials consumed or waste generation associated with the specific process/area vs. units manufactured or hours worked with respect to the previous year.

For atmospheric emissions and environmental noise, the quantity criterion is scored considering the reference limit values.

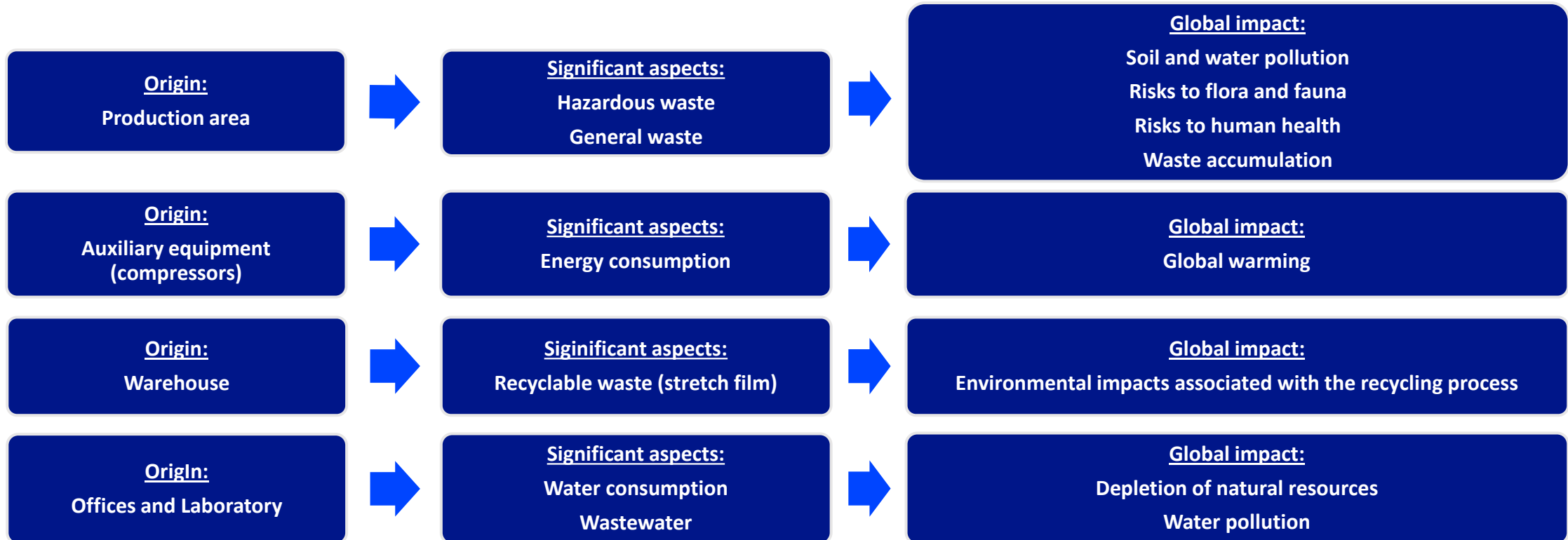
In the case of possible environmental aspects associated with modifications in product design, the percentage of projects involving an increase in the consumption of raw materials and in the amount of waste generated associated with the final disposal of the product is considered.

Indirect environmental aspects are assessed using other criteria specific to each of them.

5. ENVIRONMENTAL STATEMENT

Evaluation of environmental aspects. Results

As a result of the assessment, we obtained some significant aspects that allow us to define objectives with the aim of minimizing the associated impacts. The **significant environmental aspects** in normal operating conditions obtained in the evaluation corresponding to the year 2022 are detailed below. In all cases, these are **direct environmental aspects**.



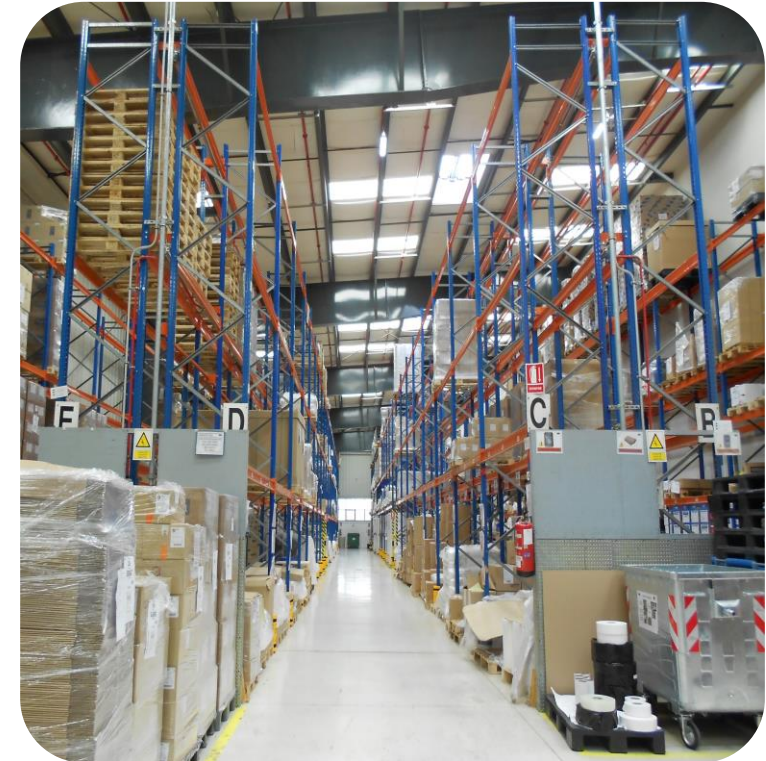
6. DIRECT ENVIRONMENTAL ASPECTS

Consumption of raw materials

PHSA's manufacturing process starts with the receipt of the necessary raw materials, which are stored in the warehouse until they are used in production.

The raw materials consumed at PHSA are mainly divided into three groups:

- **Packaging material:** cases, packaging boxes, labels, sealing paper (envelope), reels and shrink film among others.
- **Product material:** gauze, adhesive, silicone paper, basic carrier (tissue, paper, silk, polyethylene, polyurethane, nonwoven).
- **Auxiliary materials:** mainly silicone paper used in the adhesive process.

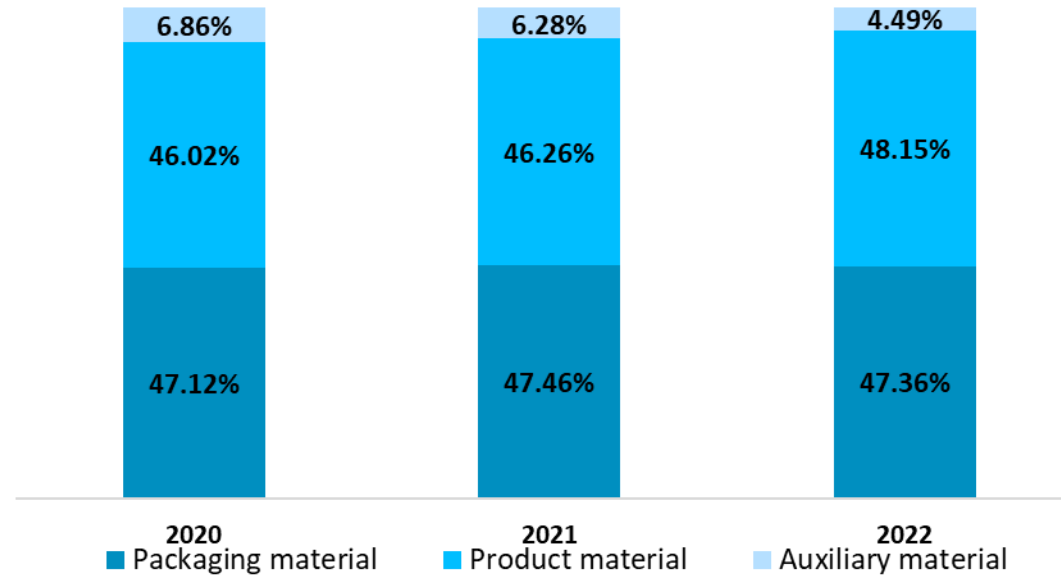


6. DIRECT ENVIRONMENTAL ASPECTS

Consumption of raw materials

As can be seen in the following graph, to manufacture our products, we consume a similar amount of material for the product and packaging material. The rest are auxiliary materials (packaging sealing glues, adhesive tapes, thermo-printing tapes...).

Evolution of the Consumption of Raw Materials



Depending on the specific requirements of each client and type of market, different levels of packaging are defined that generate differences in the evolution of the different groups of raw materials. Although it is true that, as can be seen in the graph, the percentages tend to remain quite stable over time, in 2022 there has been a small increase in the fraction corresponding to product material while packaging material has decreased compared to 2021. The most significant decrease in 2022 is observed in auxiliary material with a lower value than that registered in 2021 and 2020.

6. DIRECT ENVIRONMENTAL ASPECTS

Consumption of raw materials

A key percentage indicator is created. The calculation formula refers to the "Basis 2020" which is the consumption value of raw materials obtained in said year to which a value of 100 is assigned. Each year the evolution of consumption (increase or reduction) is evaluated in reference to the base year. Objective: to evaluate the evolution of the consumption of raw materials.

The following table shows the consumption indicators for raw materials, from the year 2020 to the year 2022:

Consumption of raw materials (percentual)	2020	2021	2022
Packaging material (100-Basis 2020)	100	101	111
Product material (100-Basis 2020)	100	101	115
Auxiliary material (100-Basis 2020)	100	92	72
Total raw materials (100-Basis 2020)	100	100	110
Total consumption of raw materials in tonnes	3,855	3,862	4,252
Ratios	2020	2021	2022
Raw Materials / units produced (tonnes/nºunitsx10 ⁵)	7.5	7.8	8.5

6. DIRECT ENVIRONMENTAL ASPECTS

Consumption of raw materials

As can be seen in the values shown, in percentage terms by type of raw material, consumption in both 2022 and 2021 are mostly higher than those corresponding to 2020.

In absolute values, the global consumption of raw materials has experienced an increase in 2022 compared to previous years. The consumption of packaging material has increased by 9.9% compared to 2021. An increase of 14.6% is also observed in the consumption of product material. In the case of the consumption of auxiliary materials, this has decreased by 21.3% in 2022 compared to 2021.

The raw material consumption ratio per units manufactured in 2022 has increased notably compared to 2021 and 2020. It should be noted that this ratio does not take into account the weight or volume of the products manufactured, taking the mix of products manufactured annually as a reference.



6. DIRECT ENVIRONMENTAL ASPECTS

Energy efficiency

The following table shows the registered energy consumption (gas and electricity) from the year 2020 to the year 2022, as well as the evolution of the indicators related to the consumption of electricity and gas by manufactured units:

Energy consumption (electricity and gas)	2020	2021	2022
Electricity Consumption MWh	4,242.2	4,200.0	4,469.1
Electricity (100-Basis 2020) (percentage)	100	99	105
Electricity / units produced (MWh/ unitsx10 ⁵)	8.29	8.44	8.95
Gas Consumption MWh	301.2	473.3	578.5
Gas (100-Basis 2020) (percentage)	100	157	192
Gas / units produced (MWh/unitsx10 ⁵)	5.89	9.51	11.59
% Renewable electricity ¹	59.5	100	100

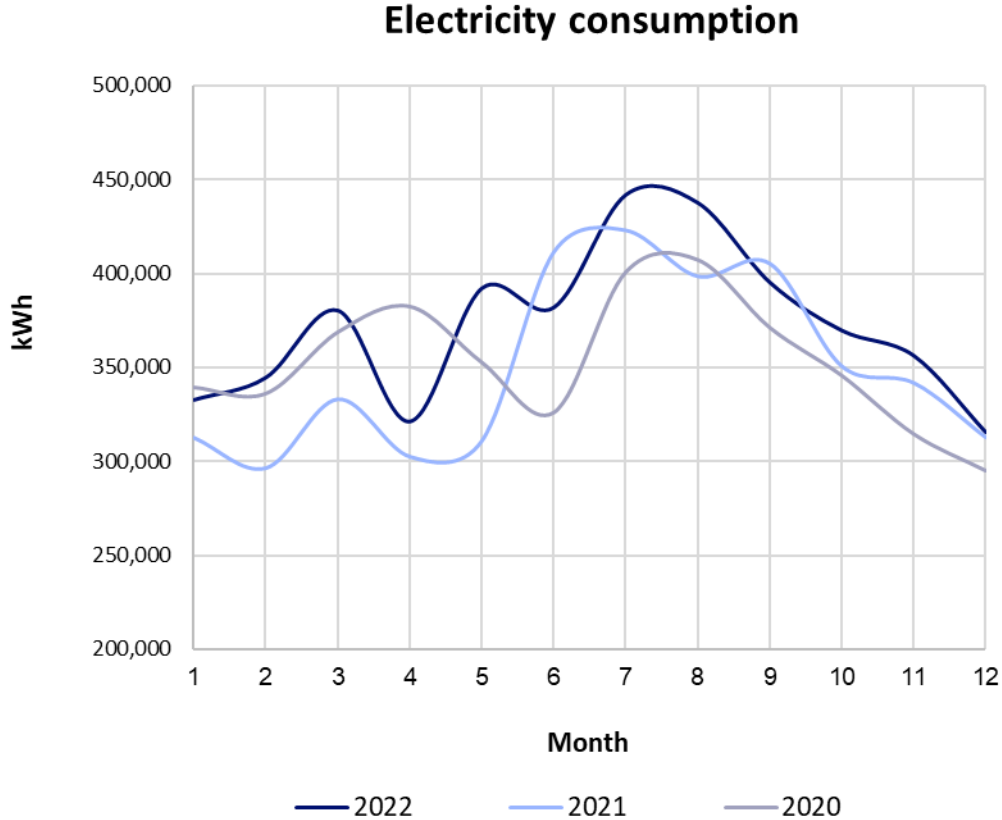


¹ See certificate of Guarantees of Origin for the year 2022 issued by the National Commission of Markets and Competition (NCMC)

6. DIRECT ENVIRONMENTAL ASPECTS

Electricity consumption

Electricity consumption is one of the most relevant aspects for PHSA.



In 2022, electricity consumption has increased by 6.4% compared to 2021.

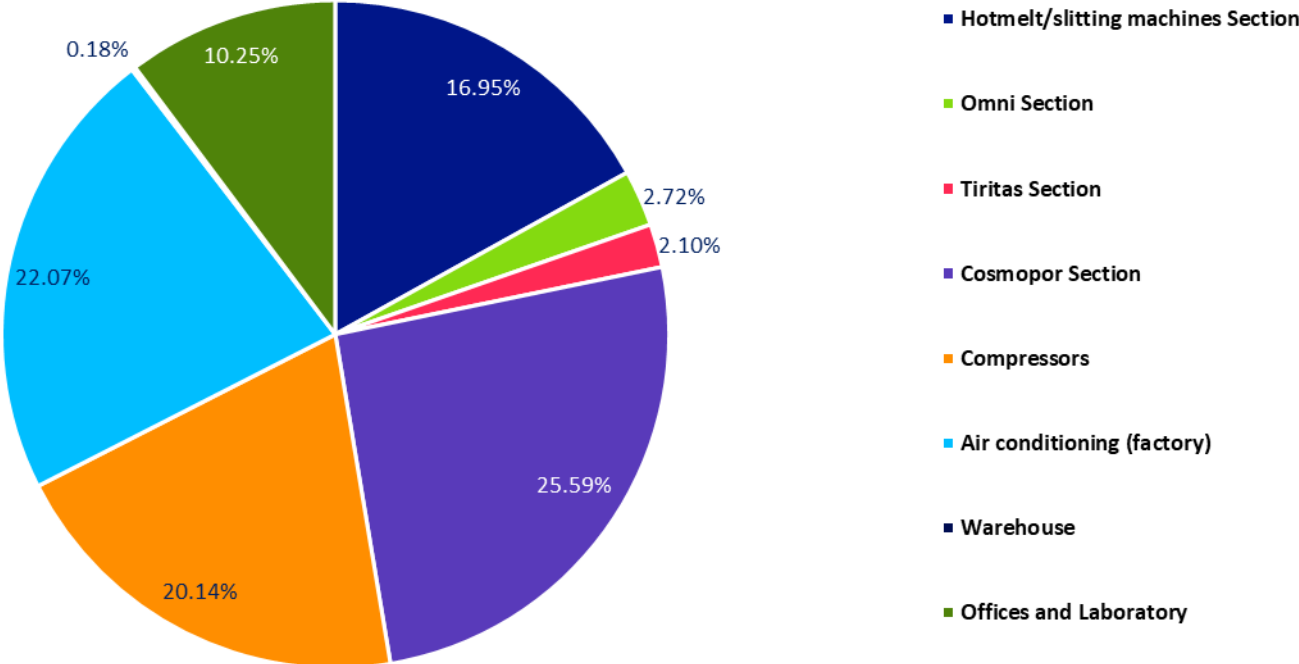
Regarding the internal indicator of electricity consumption vs. number of units produced, an increase is observed in 2022 compared to previous years. However, taking into account that the recorded mix of manufactured products does not remain constant each year and that more hours have been worked in 2022 than in 2021 and 2020, it is not considered a significant increase.

6. DIRECT ENVIRONMENTAL ASPECTS

Electricity consumption

The main electricity consumption derives from the air conditioning system of the production plant, auxiliary equipment (compressors) and the operation of the production machines.

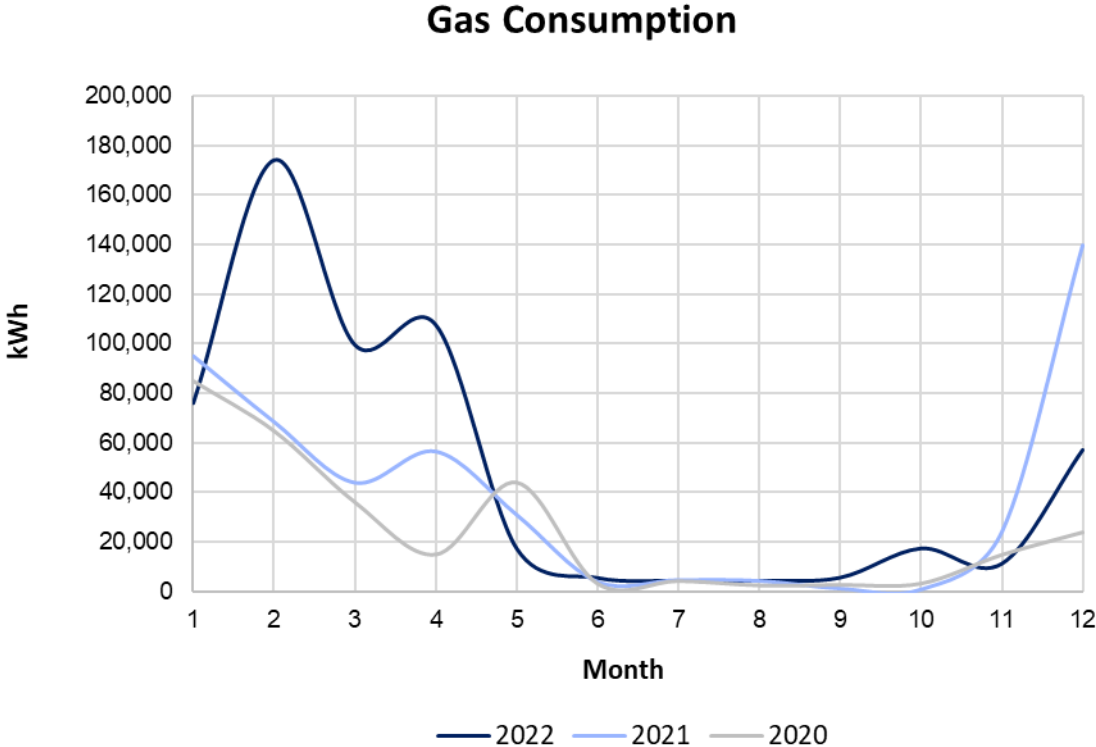
Distribution of electricity consumption 2022 by areas



6. DIRECT ENVIRONMENTAL ASPECTS

Gas consumption

All consumed gas is used for heating and for heating sanitary water.



In global terms, in 2022 gas consumption has increased by 22.2% compared to 2021. The relative indicator of gas consumption vs. number of units produced also shows an increase.

After analyzing the evolution of gas consumption in 2022 and seeing that the most notable difference compared to previous years is located in the first months of the year, we associate this increase with the malfunction of the factory air conditioning equipment, replaced in the second half of 2022.

6. DIRECT ENVIRONMENTAL ASPECTS

Water consumption and wastewater

At PHSA no water is used in the production process, its consumption is exclusively for sanitary use and cleaning tasks. Drinking water comes from the municipal water supply. The discharge of wastewater is therefore comparable to domestic, as it appears in the discharge permit. Periodically, on a voluntary basis, an analysis of the wastewater generated is carried out to verify that the discharge parameters included in the Regulatory Regulation for wastewater discharges in the Maresme region are met (BOPB No. 187 of August 5, 2004). The results obtained in the last analysis carried out in July 2022 are in accordance with the established limit values.

In order to assess the evolution of water consumption, a key percentage indicator has been established. The calculation formula refers to the "Basis 2020" which is the value of water consumption obtained in said year to which a value of 100 is assigned.

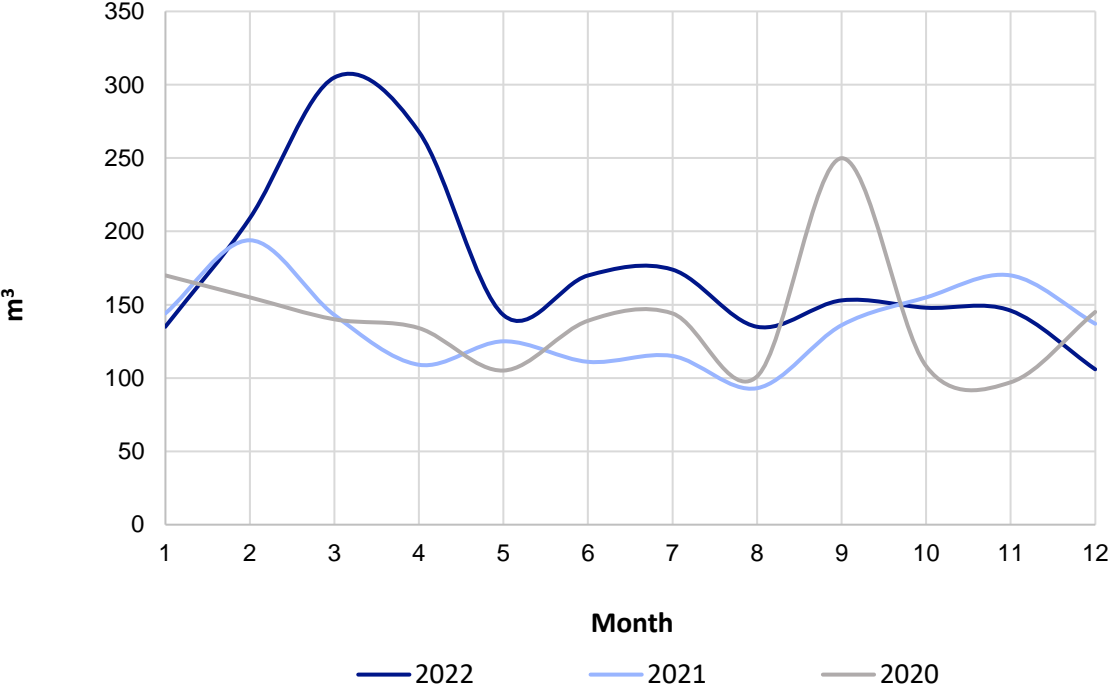
We also have other referential indicators of water consumption, based, for example, on units produced, which allow us to compare said consumption with respect to basic work indicators for the development of our activity.

Water consumption	2020	2021	2022
Water consumption (m ³)	1,688	1,632	2,092
Water consumption (100-Basis 2020) (porcentual)	100	97	124
Water consumption / units produced (m ³ /units x 10 ⁵)	3.30	3.28	4.19

6. DIRECT ENVIRONMENTAL ASPECTS

Water consumption and wastewater

Water Consumption



In 2022, in absolute value, water consumption has increased by 28.2% compared to 2021. The indicator related to water consumption vs. units produced has also worsened compared to previous years. Although it is true that the number of hours worked in 2022 has been significantly higher than in 2021 and 2020, it is not enough to justify such a significant increase in water consumption.

After the corresponding analysis, it is concluded that the increase is due to a breakdown in the softening equipment located at the entrance of the mains water. In 2023, a control plan has already been established for said equipment to be able to detect anomalies in its operation more quickly.

6. DIRECT ENVIRONMENTAL ASPECTS

Emissions

Total annual emissions of greenhouse gases according to standard UNE-EN ISO 14064-1:2019

PAUL HARTMANN ESPAÑA, S.L has a Carbon Footprint calculated in accordance with UNE-EN ISO 14064-1:2019 and verified by the Accredited Entity DNV GL Business Assurance España, S.L.U., for inventories 2020, 2021 and 2022.



Verification Statement

Validity:
1-01-2022- 31.12.2022

It is verified that the Carbon Footprint for:

PAUL HARTMANN ESPAÑA S.L.:

- PAUL HARTMANN, S.A. (PHSA)
- PAUL HARTMANN IBERIA, S.A. (PHISA)
- LABORATORIOS HARTMANN, S.A. (LHSA)

- PAUL HARTMANN, S.A. (PHSA): Carrasco i Formiguera, 48, Poligono Industrial Pla d'en Boet II, Mataró (Barcelona)

- PAUL HARTMANN IBERIA, S.A. (PHISA): Camí Ral, s/n, Montornès del Vallès (Barcelona)

- Laboratorios HARTMANN S.A. (LHSA): Carrasco i Formiguera, 48, Poligono Industrial Pla d'en Boet II, Mataró (Barcelona)

is in accordance with:

UNE-EN ISO 14064:2019 – "Greenhouse gases - Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals" (ISO 14064-1:2018). "

Data verified for the reference period (2020):

Entity	Value	Units
PHISA	24.788,49	Ton. CO _{2eq}
PHSA	7.469,59	Ton. CO _{2eq}
LHSA	10.805,11	Ton. CO _{2eq}
TOTAL	43.063,20	

The content of the "Scope, Reference Period and Evaluation Method" indicated on the second page is an integral part of this Statement.

Date and place:
Barcelona, 28.02.2022

Issuing office:
DNV Barcelona

Digitally signed by
Amores, María José
Date: 2022.11.16
22:48:28 +0100

María José Amores Barrero
Lead auditor – SCPA Iberia

Verification Statement 0003-2021-CES-DNVGL-ISO 14064-1
DNV GL Business Assurance España S.L. - Gran Via de les Corts Catalanes, 130, 136, Planta 9, 08038 Barcelona, Spain - www.dnvgl.es

Verification Statement

Validity:
16.11.2023

It is verified that the Carbon Footprint for:

PAUL HARTMANN ESPAÑA S.L.:

- PAUL HARTMANN, S.A. (PHSA)
- PAUL HARTMANN IBERIA, S.A. (PHISA)
- LABORATORIOS HARTMANN, S.A. (LHSA)

- PAUL HARTMANN, S.A. (PHSA): Carrasco i Formiguera, 48, Poligono Industrial Pla d'en Boet II, Mataró (Barcelona)

- PAUL HARTMANN IBERIA, S.A. (PHISA): Camí Ral, s/n, Montornès del Vallès (Barcelona)

- Laboratorios HARTMANN S.A. (LHSA): Carrasco i Formiguera, 48, Poligono Industrial Pla d'en Boet II, Mataró (Barcelona)

is in accordance with:

UNE-EN ISO 14064:2019 – "Greenhouse gases - Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals" (ISO 14064-1:2018). "

Data verified for the reference period (2021):

Entity	Value	Units
PHISA	26.531,67	Ton. CO _{2eq}
PHSA	7.437,01	Ton. CO _{2eq}
LHSA	10.057,18	Ton. CO _{2eq}
TOTAL	44.025,86	

The content of the "Scope, Reference Period and Evaluation Method" indicated on the second page is an integral part of this Statement.

Date and place:
Barcelona, 16.11.2022

Issuing office:
DNV Barcelona

Digitally signed by
Amores, María José
Date: 2022.11.16
22:50:12 +0100

María José Amores Barrero
Lead auditor – SCPA Iberia

Verification Statement 0003-2021-CES-DNVGL-ISO 14064-1
DNV GL Business Assurance España S.L. - Gran Via de les Corts Catalanes, 130, 136, Planta 9, 08038 Barcelona, Spain - www.dnvgl.es

Declaration of Conformity

Certificate Number:
PRJN-030174
PRJN-030174
PRJN-030174

Certificate Validity:
May 30th, 2024

Verification for Carbon Footprint of:

PAUL HARTMANN ESPAÑA S.L.:

- PAUL HARTMANN IBERIA, S.A. (PHISA)
- PAUL HARTMANN, S.A. (PHSA)
- LABORATORIOS HARTMANN, S.A. (LHSA)

PHISA: Camí Ral, s/n, Montornès del Vallès (Barcelona)
PHSA y LHSA: Carrasco i Formiguera, 48, Poligono Industrial Pla d'en Boet II, Mataró (Barcelona)

is content with:

UNE-EN ISO 14064-1:2019 "Greenhouse gases - Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals (ISO 14064-1:2018)".

Verified data for reference period 2022.

Introduction

PAUL HARTMANN ESPAÑA S.L.(HARTMANN) has commissioned DNV GL Business Assurance España SL (DNV) to carry out a limited review of the inventory of CO₂ emissions for the year 2022, contained in the Report: "202303_HARTMANN_informe.pdf" which is part of this declaration.

HARTMANN was responsible for reporting its CO₂ emissions in accordance with the reference standard UNE-EN ISO 14064: 2019 Part 1.

Verification Scope:

- Our limited review verified the 2022 CO₂ emissions generated by HARTMANN for all services offered as leading company manufacturing of medical devices (incontinence absorbers), manufacturing and development center of medical devices (Woundplasters and tapes) and design, commercialize, and distribute medical devices, intact skin antiseptics, cosmetics, food supplements, hygiene and consumer products and medicines for human use, as detailed in the verification report dated 2023-05-29 (PRJN-533157, PRJN-533178, PRJN-533174).
- Emission sources that represent less than 1% of total GHG emissions have been excluded if the total of exclusions does not exceed 1% of total emissions.

Objective

The objective of the verification is to provide interested parties with a professional and independent judgment about the information and data contained in the mentioned GHG Report.

Materiality Level

Errors / omissions which represent, single or aggregated, 5% or more of total emissions were considered material

Criteria

The reference requirements for the preparation of the GHG inventory, which serves as the basis for the information and data reported in the GHG Declaration are:

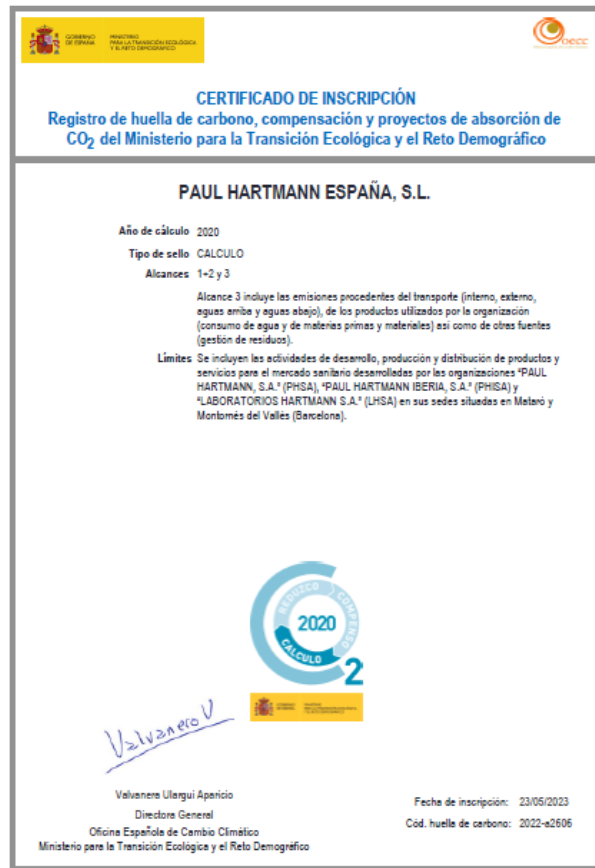
El cumplimiento de las condiciones establecidas en el Contrato guía de lugar a la concesión del certificado.
ENTIDAD ACREDITADA: DNV GL Business Assurance España, S.L.U., Gran Via de les Corts Catalanes 130-136, Pl. 9, 08038 Barcelona, Spain - TEL: +34 93 479 26 00.
www.dnvgl.es/verificacion

6. DIRECT ENVIRONMENTAL ASPECTS

Emissions

Total annual emissions of greenhouse gases according to standard UNE-EN ISO 14064-1:2019

PAUL HARTMANN SPAIN, S.L. It has a certificate of registration in the Registry of carbon footprint, compensation and CO₂ absorption projects of the Ministry for the Ecological Transition and the Demographic Challenge for the years 2020 and 2021 with the “CALCULO” seal.



6. DIRECT ENVIRONMENTAL ASPECTS

Emissions

Total annual emissions of greenhouse gases according to standard UNE-EN ISO 14064-1:2019

For the calculation and reporting of GHG emissions associated with the HARTMANN Spain organization, the structure and methodology proposed by UNE-EN ISO 14064-1:2019 Greenhouse gases has been followed. Part 1: Specification with guidance, at the organization level, for the quantification and reporting of greenhouse gas emissions and removals. (ISO 14064-1:2018).

The emission sources included for the calculation of the carbon footprint of HARTMANN Spain are:

Category 1. Direct GHG emissions and removals (Stationary combustion / Mobile combustion / HFC leaks / Direct removals from land use)

Category 2. Indirect GHG emissions from imported energy

Category 3. Indirect GHG emissions from transportation (Internal transportation: employee mobility / External transportation: business trips / Upstream transportation: transportation of raw materials / Downstream transportation: transportation of manufactured products)

Category 4. Indirect GHG emissions by products used by the organization (Consumption of raw materials / Consumption of water / Waste management)

Category 5. Indirect GHG emissions associated with the use of the organization's products (N/A)

Category 6. Indirect GHG emissions from other sources (N/A)

6. DIRECT ENVIRONMENTAL ASPECTS

Emissions

Total annual emissions of greenhouse gases according to standard UNE-EN ISO 14064-1:2019

¹ Comparison of the results obtained for PHSA in the calculation of the emissions inventory for the years 2020, 2021 and 2022:

Emission category	2020 Tonnes CO ₂ eq	2021 Tonnes CO ₂ eq	2022 Tonnes CO ₂ eq
Category A. Direct GHG emissions	102.27	120.29	145.12
Emisiones directas a partir de combustión estacionaria	55.01	86.49	107.16
Emisiones directas de combustión móvil	14.82	17.01	21.71
Emisiones fugitivas causadas por la liberación de GEI en sistemas antropogénicos	32.45	16.80	16.25
Emisiones causadas por recargas de extintores	0.00	0.00	0.00
Category A. Direct GHG removals	0.00	0.00	0.00
Direct removals caused by land use	0.00	0.00	0.00
Category B. Indirect GHG emissions from imported energy	621.95	2.29	2.88
Indirect emissions from electricity consumption	621.95	2.29	2.88
Category C. Indirect GHG emissions from transport	526.31	615.52	605.59
Internal transport: Employee mobility	77.14	187.14	186.29
External transport: Business trips	5.78	6.79	63.42
Upstream transport: Reception of raw materials	440.41	386.87	348.83
Downstream Transportation: Product Distribution	11.71	42.59	11.91

6. DIRECT ENVIRONMENTAL ASPECTS

Emissions

Total annual emissions of greenhouse gases according to standard UNE-EN ISO 14064-1:2019

Emission category	2020 Tonnes CO ₂ eq	2021 Tonnes CO ₂ eq	2022 Tonnes CO ₂ eq
Category D. Indirect GHG emissions from products used by the organization	6219.05	6698.91	7373.95
Water consumption	0.46	0.40	0.55
Raw material consumption	6014.23	6172.05	6844.06
Waste management	274.13	587.66	608.10
Category E. Indirect GHG emissions associated with the use of products of the organization	0.00	0.00	0.00
N/A	0.00	0.00	0.00
Category F. Indirect GHG emissions from other sources	0.00	0.00	0.00
N/A	0.00	0.00	0.00
TOTAL	7,548.09	7,506.08	8,211.16

¹Data collected in the Report on Greenhouse Gas Emissions. Carbon Footprint prepared by DEPLAN dated May 2023. Data validated in the certification audit in accordance with ISO 14064 by the accredited entity DNV GL Business Assurance España, S.L.U.

6. DIRECT ENVIRONMENTAL ASPECTS

Emissions

Total annual emissions of greenhouse gases according to standard UNE-EN ISO 14064-1:2019

PHSA's carbon footprint in 2022 was 8,211.16 tonnes CO₂eq, of which 90.76% were emissions corresponding to category D, that is, indirect emissions from products used by the organization. 7.43% were category C indirect emissions derived from transport, 1.77% are category A direct emissions and 0.04% emissions derived from electricity consumption (category B)

Total PHSA emissions in 2022 have increased by 9.39% over 2021 and 8.78% over the 2020 base year.

The increase in GHG emissions from PHSA is mainly due to the increase in indirect GHG emissions from business trips, which have increased by 834% compared to 2021. Direct emissions from water consumption have also increased (37.3 %) and consumption of raw materials (10.71%), as well as direct emissions from stationary combustion (23.90%) and mobile combustion (27.63%).

¹The emission ratios for the years 2020, 2021 and 2022 are compared below:

Item	Emission rate		
	2020	2021	2022
Tonnes CO ₂ eq / units produced x 10 ³	0.15	0.15	0.16
Tonnes CO ₂ eq / turnover x 10 ³	0.27	0.25	0.25
Tonnes CO ₂ eq / employee	41.02	48.74	43.45

¹Data collected in the Report on Greenhouse Gas Emissions. Carbon Footprint prepared by DEPLAN dated May 2023. Data validated in the certification audit in accordance with ISO 14064 by the accredited entity DNV GL Business Assurance España, S.L.U.

6. DIRECT ENVIRONMENTAL ASPECTS

Emissions

Yearly total direct emissions

PHSA has three process emissions points not subject to regulatory control (activity classified in the catalog of potentially polluting activities of the atmosphere (CAPCA-2010) with code 06 03 06 04). The points are located in the adhesive coating area. Voluntary periodic measurements are taken as established in our control plan. Due to the nature of the process and materials used, the associated emissions of nitrogen oxides (NO_x), sulfur dioxide (SO₂) and solid particles are not considered significant. Emissions of volatile organic compounds are determined using the technical instruction: “TECHNICAL INSTRUCTION OF THE GENERAL DIRECTORATE OF ENVIRONMENTAL QUALITY ITVCA 07 (Revision 6, June 2017)” as a reference for their assessment. The following table shows the results obtained in the latest measurements carried out:

Adhesive coating machine Total organic carbon (TOC)	TOC limit (mgC/Nm ³) ITVCA-07 (Rev.6, June 2017)	TOC obtained results (mgC/Nm ³) (measurements June 2020)	TOC limit (kgC/h) ITVCA-07 (Rev.6, June 2017)	TOC obtained results (kgC/h) (measurements June 2020)
17028: Coating extraction silicone (silicone)	50	4.98	0.5	0.04
17029: Coating extraction silicone (oven)	50	7.55	0.5	0.04
17030: Coating extraction silicone (aspiration)	50	6.42	0.5	<0.01

6. DIRECT ENVIRONMENTAL ASPECTS

Emissions

Yearly total direct emissions

PHSA has two boilers, one for heating and the other for sanitary hot water. Due to the nature of both processes, intended for thermal comfort, and the fuel used, natural gas, the associated emissions of nitrogen oxides (NO_x) and sulfur dioxide (SO₂) are not considered significant. Additionally, the combustion of natural gas does not generate solid particles.

On the other hand, as part of the controls established in the RITE, the gases from the combustion boilers are periodically analyzed. Carbon monoxide (CO) content is determined as an indicator of combustion quality. The following table shows the maximum values obtained in the measurements performed in 2022, 2021 y 2020:

Boiler sanitary water	Limit ppm (RD 833/1975)	Maximum measured value 2020 (ppm)	Maximum measured value 2021 (ppm)	Maximum measured value 2022 (ppm)
CO	500	64	95	24
Boiler heating	Limit ppm (RD 833/1975)	Maximum measured value 2020 (ppm)	Maximum measured value 2021 (ppm)	Maximum measured value 2022 (ppm)
CO	500	79	290	48

6. DIRECT ENVIRONMENTAL ASPECTS

Noise

PHSA plans periodic measurements every 5 years and whenever any modification is made to the facilities that may affect the environmental noise emitted. Measurements are carried out by an accredited external laboratory.

Last measurements made: July 2020, October 2020 and March 2021. In July 2020 one of the immission sources obtained an unfavorable measurement at night period. After making the necessary corrections, the measurement is repeated in October 2020, obtaining a new non-compliant result. Finally, after detecting the real root cause (compressor failure), the result obtained in March 2021 was in accordance with the applicable regulation (Regulating ordinance of noise and vibrations from Mataró).

Defined hourly intervals	Limit dBA Regulating ordinance of noise and vibrations from Mataró	Measurements July 2020		Measurements October 2020		Measurements March 2021	
		Focus 1	Focus 2	Focus 1	Focus 2	Focus 1	Focus 2
Daytime (7 – 21h)	70	51	65	—	—	—	—
Evening (21 – 23h)	70	*	*	*	*	*	*
Nocturne (23 – 7h)	60	48	61	—	62	—	52

*Limit value equivalent to the daytime, it's evaluated the fulfilment in daytime and nocturn

6. DIRECT ENVIRONMENTAL ASPECTS

Soil

Regarding soil, the different PHSA facilities were built directly on previously unused soil in Mataró. PAUL HARTMANN S.A. is located in an eminently urban and industrial environment. Approximately 97% of the soil on the plot is paved or asphalted and there is a rainwater collection system so that the impact is limited.

Use of the soil related to the biodiversity	Total (m ²)
Total soil use	11000
Total sealed area	10670
Total area in the center oriented according to nature	0
Total area outside the center oriented according to nature	0

Safety cabinets are available for the storage of chemical products and the different storage areas for both chemical products and hazardous waste have retention bins. Additionally, we have spill absorption and retention systems distributed at various points in the plant for use in the event of accidental spillage.

PHSA, in accordance with Royal Decree 9/2005 of January 14, which establishes the list of potentially soil-contaminating activities and the criteria and standards for the declaration of contaminated soils, presented the Preliminary Situation Report to the Agencia Catalana de Residuos de Catalunya in 2010 as well as the corresponding Periodic Situation Report in early 2020.

6. DIRECT ENVIRONMENTAL ASPECTS

Hazardous substances

The organization's procedures and instructions establish the principles and guidelines for the handling of those materials, mixtures and products that may be harmful to employees and the environment.

All dangerous substances found in our facilities are evaluated, authorized, registered and updated in the list of safety data sheets.



6. DIRECT ENVIRONMENTAL ASPECTS

Hazardous substances

The following table shows the evolution of the consumption of the main hazardous substances used in the plant.

Hazardous substance	2020	2021	2022
Printing inks (liters)	194.20	214.52	248.34
Printing additives (methylethylketone) (liters)	381.20	229.20	239.80
Bonding agent (HF 86) (liters)	191.00	241.49	163.06
Orange extract cleaning solvent (liters)	780	1620	960
Total hazardous material consumption (liters)	1546.40	2305.21	1611.2
Total hazardous material consumption / units produced (liters / units x 10 ⁵)	3.02	4.63	3.23

The consumption of printing inks in 2022 has increased by 15.77% compared to 2021 and 27.88% compared to 2020. This is due to the need to print more information on the products than in the past. Additionally, the number of units manufactured in 2022 has been higher than in 2021, especially in product ranges that require UDI printing. The consumption of printing additives has also increased in 2022, although in a less significant way since the new markers that are installed work with ink cartridges and do not require the use of additives.

The consumption of the HF86 bonding agent, used in the direct coating process with adhesive, has decreased in 2022. This decrease is directly related to the reduction in 2022 compared to 2021, in the coated surface of products that use this component.

The consumption of orange extract cleaning solvent, commonly used for cleaning tasks, has also decreased significantly in 2022.

6. DIRECT ENVIRONMENTAL ASPECTS

Waste

The total quantity of waste generated depends on the workload of the different production processes, new products launches and therefore the introduction of new materials and the learning process in different production lines.

At the Mataró site, the active waste management is an integral part of HARTMANN's environmental policy, so we apply the following principle: "Not generate is better than recycling and recycling is better than disposing".

We make sure that our external maintenance suppliers take care of their waste in accordance with our internal requirements and applicable regulations.

PAUL HARTMANN SPAIN, S.L. has a Declaration of Conformity for the waste generated in the facilities located in Mataró and Montornés del Vallés for the period between May 1, 2022 and May 31, 2023 as they have been managed in accordance with the procedures of the "Zero Waste to Landfill" program. Declaration of Conformity issued by the Accredited Entity DNV GL Business Assurance España, S.L.U.



Declaration of Conformity

Certificate Number: PRLN-500662, PRLN-5011020 and PRLN-500623
 Certificate valid: June 12th, 2023

Introduction

PAUL HARTMANN ESPAÑA, S.L. (PAUL HARTMANN IBERIA, S.A., PAUL HARTMANN, S.A. and LABORATORIOS HARTMANN, S.A. (from then on PHISA, PHSA and LHSA), manufacturing center of medical devices (incontinence absorbers), manufacturing and development center of medical devices (Woundplasters and tapes) and design, commercialization, and distribution in Spain of medical devices, intact skin antiseptics, cosmetics, food supplements, hygiene and consumer products and medicines for human use, has commissioned to verification entity DNV to carry out a limited independent verification, on waste management as part of the integrated management of waste avoiding landfill, as part of the company's Circular Economy policies, hereinafter referred to as "Zero Waste to Landfill" in this statement.

Purpose of verification:

The specific purpose of the verification consisted of the verification of the management of waste generated in the production activities of PHISA-PHSA-LHSA, during the year between 1 May 2022 and 31 May 2023).

It has been verified that waste is managed by authorized waste managers for recovery, reuse, recovery and/or temporary storage for subsequent recovery, reuse or recovery, which is the basis of the policies of the Zero Waste to Landfill programme. It has also been verified that the company has a waste minimization plan in which the consumption history, objectives and areas of waste reduction, as well as mitigation actions, are recorded.

Scope of verification:

The implementation of the procedures and results of the "Zero Waste to Landfill" programme has been verified for the following scope:

- Production activity encompassing manufacturing center of medical devices (incontinence absorbers), manufacturing and development center of medical devices (Woundplasters and tapes) and design, commercialization, and distribution in Spain of medical devices, intact skin antiseptics, cosmetics, food supplements, hygiene and consumer products and medicines for human use.

Amount of waste managed in accordance with the procedure of the Zero Waste to Landfill programme "Zero Waste to Landfill":

	Total amount of waste generated	Amount of waste managed under the "Zero Waste to Landfill" programme	Ratio of waste managed according to programme/waste generated (%)
2022	2.287 t	2.287 t	100 %
2023	1.382 t	1.382 t	100 %
Total	3.668 t	3.668 t	100 %

The amount of waste declared and verified includes **all waste** generated in the production activity of PHISA-PHSA-LHSA.

This **includes** the initial management of waste through authorized waste managers, who have provided evidence by means of visits and recovery management guarantee certificates of zero waste to landfill, generated at PHISA-PHSA-LHSA for both hazardous and non-hazardous waste in external recovery:

El incumplimiento de las condiciones establecidas en el Contrato puede dar lugar a la cancelación del certificado.
 ENTIDAD ACREDITADA: DNV GL Business Assurance España, S.L., Gran Vía de les Cortes Catalanes 130-136, Pl. 9, 08038 Barcelona, Spain - TCL: +34 93 479 26 00.
www.dnv-assurance.com



NHW:

- **Wet Cellulose** (V83, composting)
- **Wooden Packaging** (V15, recycling and reuse of wood)
- **General Waste, Shrink Film, Toner Waste, Organic Waste, Adhesive Waste, Adhesive Waste** (T62, Recovery through Collection and Transfer Centre).
- **Paper and cardboard** (V11, paper and cardboard recycling).
- **Electrical equipment and metals** (V41, metal recycling and recovery)
- **Plastic packaging** (V12 plastics recycling)
- **Organic waste** (T62, recovery management through a Transfer Centre)
- **Aqueous adhesives** (V43, Regeneration of acids and bases).

HW: (Management through T62 for all, Recovery through Collection and Transfer Centre).

- **Waste adhesives that containing solvents, Aqueous cleaning liquids, Mineral oils and filters**
- **Packaging containing traces of hazardous materials, Antifreeze, Rejected equipment containing chlorofluorocarbons, Fluorescent tubes Batteries and accumulators, Packaging containing traces of hazardous materials, Other solvents and mixtures, Paint Waste, Absorbents, Aerosols and Antifouling solution.**
- **Silicone mixture residue** (T62 and V43 acid and base regeneration)

In the verification of this declaration, no type of waste generated by the company has been **excluded**. In all cases, only waste from the facilities located at the Mataró and Montornés del Vallés sites was recorded, with waste from transport and logistics centers being excluded from the scope.

Verification methodology:

This verification has been carried out by means of data provided by the organization and checks carried out on the documentation of generation, segregation and transfer of waste to authorized managers, visits to the different plants of the majority manager where PHISA-PHSA-LHSA's waste is managed, verification of the authorizations of the authorized managers, the documentation of the environmental management system, through the Zero Waste to Landfill Policy and PHISA-PHSA-LHSA's Integrated Quality, Environment, Safety and CSR Policy (certified according to ISO 9001, ISO 14001, ISO 13485, ISO 45001, 21 CFR 820, ISO 14064 and EMAS), interviews with key personnel of the organization involved in waste management and on-site visit to the manufacturing center and the company's main waste manager, carried out by sufficient data sampling.

Conclusion:

In accordance with what is indicated in this statement, in the opinion of the evaluation team, there is no evidence to suggest that the data provided by PHISA-PHSA-LHSA on the amount of waste managed under the policies of the "Zero Waste to Landfill" programme during the year between May 2022 and May 2023 are not correct. In turn, it is evident that the groups of waste managed in accordance with the "Zero Waste to Landfill" programme represent the total waste generated in the manufacture and development of medical devices, design, marketing and subsequent distribution of these products.

Place and date:
 Barcelona, June 12th of 2023

DNV – Supply Chain and Product Assurance
 Gran Vía de les Cortes Catalanes 130-136, Pl. 9,
 08038, Barcelona, Spain

Amores ^{Trinity signed}
 , María ^{Trinity signed}
 José ^{Trinity signed}

María José Amores Barrero
 ESG Senior consultant DNV – SCPA/Iberia

DNV disclaims any type of responsibility or co-responsibility for the decisions that any person or entity may adopt based on this Declaration of Conformity.

DNV – Supply Chain and Product Assurance
 Gran Vía de les Cortes Catalanes 130-136, Pl. 9,
 08038, Barcelona, Spain

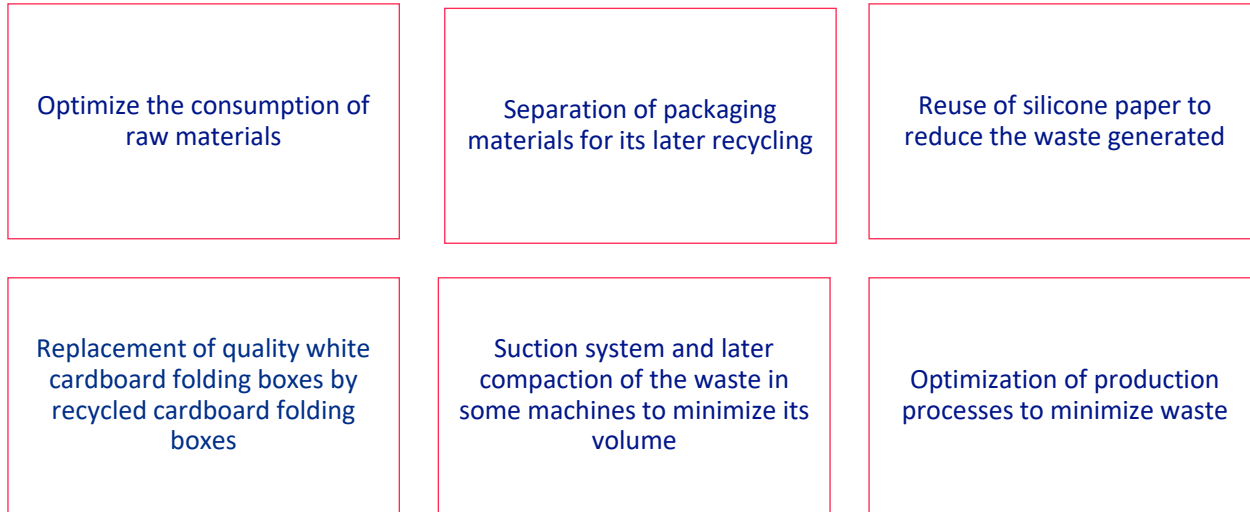
Saldo ^{Trinity signed}
 Vilatorre ^{Trinity signed}
 Juan ^{Trinity signed}
 Andrés ^{Trinity signed}

Juan A. Saldo Vilatorre
 Country Manager DNV – SCPA/Iberia

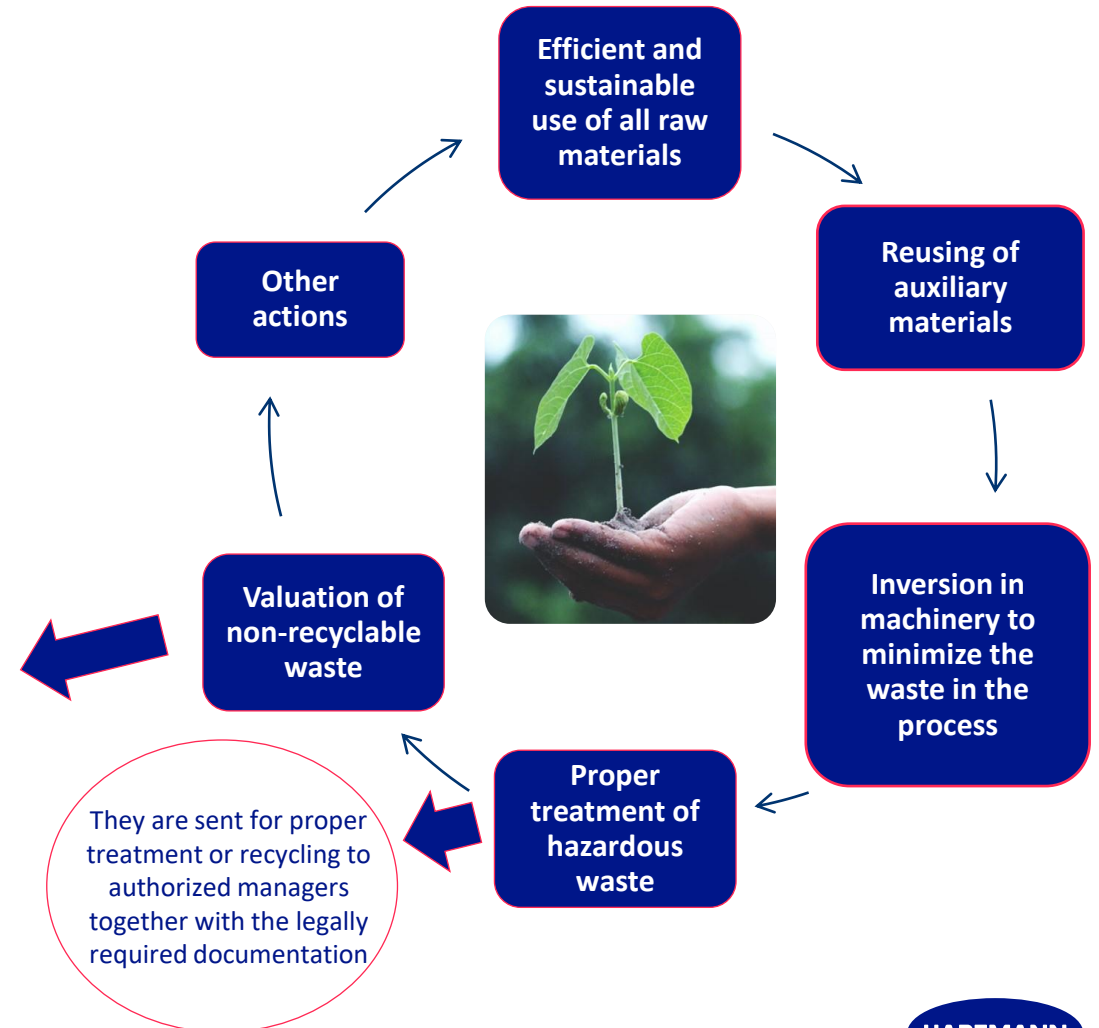
El incumplimiento de las condiciones establecidas en el Contrato puede dar lugar a la cancelación del certificado.
 ENTIDAD ACREDITADA: DNV GL Business Assurance España, S.L., Gran Vía de les Cortes Catalanes 130-136, Pl. 9, 08038 Barcelona, Spain - TCL: +34 93 479 26 00.
www.dnv-assurance.com

6. DIRECT ENVIRONMENTAL ASPECTS

Waste



Non-recyclable waste, industrial waste that can be assimilated to urban waste that is valued through a mechanical process by which fuel for cement plants is obtained. Made by authorized manager



6. DIRECT ENVIRONMENTAL ASPECTS

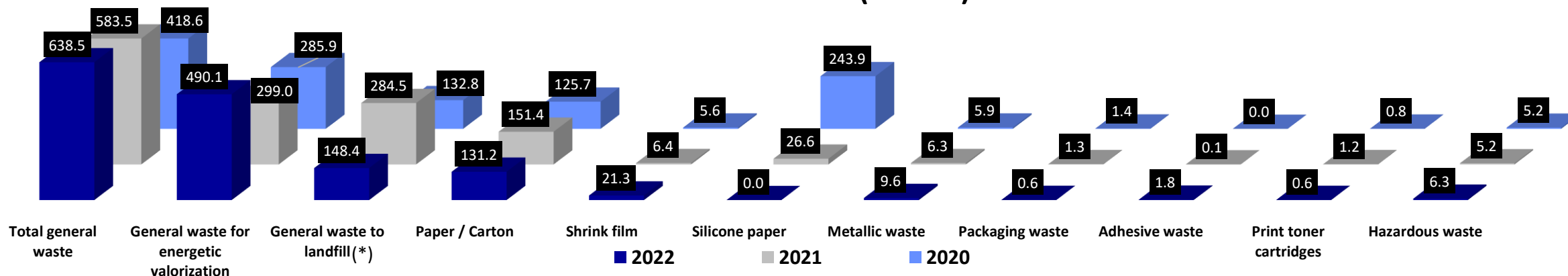
Waste

The following graph shows the quantity and distribution of waste generated in 2022, 2021 and 2020. If we compare 2022 vs. 2021, an increase is observed, in global terms, in general waste, partly due to the fact that in 2022 all silicone paper waste was managed as general waste.

(*) General waste for energetic valorization in 2022 increases significantly thanks to the change of Authorized Manager for this waste, who guarantees that none of the managed waste is sent to landfill. The fraction of general waste to landfill corresponds to the amount managed in the period from January to April 2022 with the previous manager.

As other remarkable changes would be the reduction in the amount of paper/carton waste generated in 2022, as well as the increase in shrink film waste. In the case of this last residue, said increase is related to an improvement in the precision of the values reported by the Authorized Manager.

Waste distribution (tonnes)



6. DIRECT ENVIRONMENTAL ASPECTS

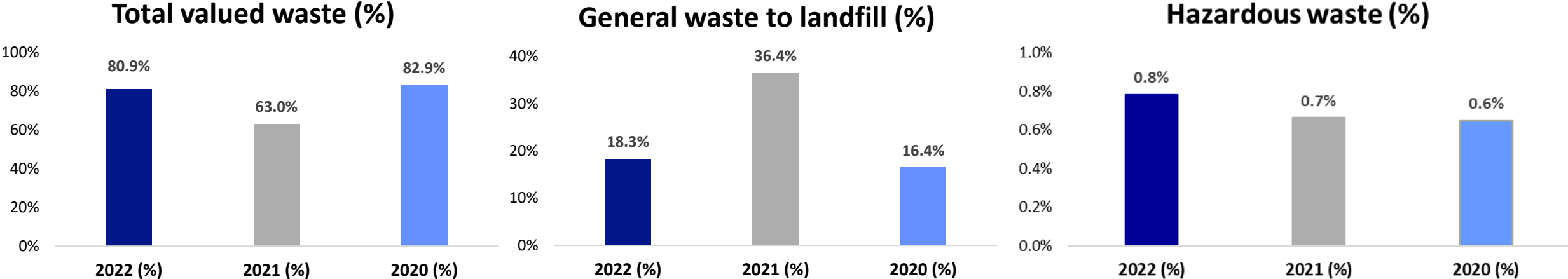
Waste

The following table shows the evolution of percentages of the valued waste, not valued waste and hazardous waste generated by our industrial activity:

Type of waste	2022	2021	2020
Total valued waste (%)	80.9%	63.0%	82.9%
General waste for energetic valorization (%)	60.5%	38.2%	35.4%
Paper / Carton (%)	16.2%	19.4%	15.6%
Shrink film (%)	2.6%	0.8%	0.7%
Silicone paper (%)	0.0%	3.4%	30.2%
Metallic waste (%)	1.2%	0.8%	0.7%
Packaging waste (%)	0.1%	0.2%	0.2%
Adhesive waste (%)	0.2%	0.0%	0.0%
Print toner cartridges(%)	0.1%	0.1%	0.1%
General waste to landfill (%)	18.3%	36.4%	16.4%
Hazardous waste (%)	0.8%	0.7%	0.6%

6. DIRECT ENVIRONMENTAL ASPECT

Waste



As can be seen in the graphs, the percentage of valued waste has increased significantly in 2022 vs. 2021, due to the increase in the fraction of general waste destined to energetic valorization.

In the case of hazardous waste in 2022, a slight increase of 0.1% is observed compared to 2021, not significant, mainly due to the increase in the amount of contaminated packaging generated in the adhesive section (Hotmelt section), which has increased the coated surface in 2022 compared to 2021 and 2020.

6. DIRECT ENVIRONMENTAL ASPECTS

Waste

Indicator	2022	2021	2020
Waste not hazardous (tonnes)	803.6	776.8	802.0
Hazardous waste (tonnes)	6.3	5.2	5.2
Waste not hazardous / units produced (tonnes/units x10 ⁵)	0.013	0.010	0.010
Hazardous waste / units produced (tonnes/units x10 ⁵)	1.61	1.56	1.57
Total waste / units produced (tonnes/units x10 ⁵)	1.62	1.57	1.58

The waste generation indicators with respect to manufactured units have increased in 2022 compared to previous years since the increase in the amount of waste generated has been higher than the increase in the number of manufactured units. It therefore seems that in 2022 there has been a less efficient consumption of raw materials. However, as previously mentioned, the number of units produced does not take into account the weight or volume of the manufactured products.

We continue working on actions to minimize the waste generated as well as awareness actions for our workers.

7. INDIRECT ENVIRONMENTAL ASPECTS

Waste management

- PHSA contracts only authorized transport and authorized waste treatment companies to transport and treat each type of waste in the most appropriate way in each case.
- Our products, once used, are not hazardous waste.
- Waste management according to the "Zero Waste to Landfill" program since May 2022.

External transport

- The transport of our products is performed basically by road and with high-capacity trucks. This activity is contracted to third parties.

Sterilization process

- Certain products are sterilized externally under the responsibility of the HARTMANN group headquarters.
- Audits are planned and carried out in coordination with the plant to review correct quality and environmental management.

Suppliers and subcontractors

- There are environmental purchasing requirements.
- Registered contractors and subcontractors are informed about the company's Environmental Policy, as well as the existing regulations regarding the environment, waste collection and management, and identified environmental aspects.
- Specific annual environmental and health and safety assessment for HSE critical contractors and suppliers.

8. EMERGENCY PLAN

PHSA has an emergency plan (PAU) which establishes the responsibilities and actions to be taken in the event of an emergency situation.

Possible emergencies at PHSA: fire, work accidents, leakage or spillage of hazardous substances, conflict situation with the possibility of aggression, gas leakage, flood, strong wind, intrusion or robbery, power outage, bomb alert.

Different groups and responsibilities are defined in the flowchart of the Emergency Plan:

- Head of emergency
- Intervention chief
- Evacuation and confinement team
- Communication team
- First intervention team
- First aid team (it includes trained personnel for the use of the defibrillator).

These teams are specifically trained



8. EMERGENCY PLAN



Periodic training for emergency response and periodic drills are held to test the effectiveness and organization of the Emergency Plan.

A list with all the available members of the different teams per shift as well as the telephone numbers of interest is printed and exposed daily at the factory.

PHSA has an adequate fire protection system.

Equipment and facilities for fire protection are periodically checked by an expert subcontractor.



9. LEGAL COMPLIANCE

Compliance with legal requirements constitutes a permanent commitment at PHSA as a guarantee value for the effectiveness of the environmental management system.

At PHSA there is a defined process to ensure the identification, evaluation and monitoring of legal requirements.

PHSA works with a specialized environmental consultancy that periodically compiles the published environmental legislation (at local, autonomic, state and EU level) and extracts the specific requirements included in the legislative texts. PHSA reviews these requirements and activates those that are applicable in the online application developed by the consulting company for subsequent evaluation and monitoring.

A formal review of the legal application requirements and their status is carried out quarterly, especially highlighting those new requirements that have been published in the period evaluated. The corresponding report is reviewed by General Management.

The tables below detail the main environmental permits, licenses and controls at PHSA, as well as the reference legislation.

9. LEGAL COMPLIANCE

Environmental vector	Permit/License/Control	Reference legislation
Licenses	<ul style="list-style-type: none"> Municipal activity license (February 2023) Type 2 environmental license (March 2010) 	<ul style="list-style-type: none"> Law 3/1998, of February 27, on the Integrated Intervention of the Environmental Administration
Water	<ul style="list-style-type: none"> Discharge permit (last renewal April 2020, valid until 05/15/2025) Declaration of the use and pollution of water (DUCA), abbreviated type (last declaration December 2020, valid until December 2024) Periodic analysis (voluntary control every four years) of wastewater (last control July 2022, next control before July 2026) 	<ul style="list-style-type: none"> Regulations governing wastewater discharges in the Maresme region (BOPB No. 187 of August 5, 2004) Decree 103/2000, of March 6, which approves the Regulation of the taxes managed by the Catalan Water Agency
Energy efficiency	<ul style="list-style-type: none"> Energy efficiency audit (last audit carried out in November 2020, valid until November 2024) 	<ul style="list-style-type: none"> Royal Decree 56/2016, of February 12, transposing Directive 2012/27/EU of the European Parliament and of the Council, of October 25, 2012, on energy efficiency, with regard to energy audits, accreditation of service providers and energy auditors and promotion of energy supply efficiency

9. LEGAL COMPLIANCE

Environmental vector	Permit/License/Control	Reference legislation
Chemical storage	<ul style="list-style-type: none"> Quarterly reviews of the status and content of safety cabinets for flammable products (according to APQ10) Annual review of the availability, current version and content of the safety data sheets of the products used 	<ul style="list-style-type: none"> Royal Decree 656/2017, of June 23, approving the Chemical Products Storage Regulations and their Complementary Technical Instructions MIE APQ 0 to 10 Regulation (CE) nº 1907/2006 of the European Parliament and of the Council, of December 18, 2006, regarding the registration, evaluation, authorization and restriction of chemical substances and preparations (REACH), which creates the European Agency for Chemical Substances and Preparations, Directive 1999/45/EC is amended and Council Regulation (EEC) No. 793/93 and Commission Regulation (EC) No. 1488/94 are repealed, as well as Directive 76/769/CEE of the Council and Directives 91/155/CEE, 93/67/CEE, 93/105/CE and 2000/21/CE of the Commission Regulation (EU) 2015/830 of the commission of May 28, 2015, which modifies Regulation (EC) no 1907/2006 of the European Parliament and of the Council, regarding the registration, evaluation, authorization and restriction of chemical substances and mixtures (REACH) Regulation (EU) 2020/878 of the commission of June 18, 2020, which modifies annex II of Regulation (EC) no. 1907/2006 of the European Parliament and of the Council, regarding the registration, evaluation, authorization and the restriction of chemical substances and mixtures (REACH)"

9. LEGAL COMPLIANCE

Environmental vector	Permit/License/Control	Reference legislation
Emissions	<ul style="list-style-type: none"> • Periodic controls according to RITE of the flue gases of the domestic hot water boiler and the heating boiler (both natural gas) • Periodic control (every 6 months/12 months depending on the equipment) for refrigerant gas leaks • Periodic control (voluntary control every four years) of the identified process emission sources (last control June 2020, next control before June 2024) 	<ul style="list-style-type: none"> • Royal Decree 178/2021, of March 23, which modifies Royal Decree 1027/2007, of July 20, which approves the Regulation of Thermal Installations in Buildings • Decree 833/1975, of February 6, which develops Law 38/1972, of December 22, on the protection of the atmospheric environment • Royal Decree 115/2017, of February 17, which regulates the marketing and handling of fluorinated gases and equipment based on them, as well as the certification of the professionals who use them and which establishes the technical requirements for facilities that carry out activities that emit fluorinated gases • Technical Instruction of the General Directorate of Environmental Quality ITVCA 07 (Revision 6, June 2017) (reference regulations, only for guidance)
Sustainability	<ul style="list-style-type: none"> • Annual Sustainability Report 2021 verified in 2022 by PwC. Annual Sustainability Report 2022 in verification process 	<ul style="list-style-type: none"> • Law 11/2018, of December 28, which modifies the Commercial Code, the consolidated text of the Capital Companies Law approved by Royal Legislative Decree 1/2010, of July 2, and Law 22/ 2015, of July 20, Audit of Accounts, in matters of non-financial information and diversity
Soil	<ul style="list-style-type: none"> • Periodic Situation Report (last report submitted in January 2020, next report in January 2030) 	<ul style="list-style-type: none"> • Royal Decree 9/2005 of January 14, which establishes the list of activities potentially contaminating the soil and the criteria and standards for the declaration of contaminated soils

9. LEGAL COMPLIANCE

Environmental vector	Permit/License/Control	Reference legislation
Waste	<ul style="list-style-type: none"> Inscripción en el Registro de Productores de Residuos Industriales, P-50305.1 (RGPPRC) Declaración anual de residuos industriales (DARI) (última declaración correspondiente a 2022 presentada el 1 de marzo de 2023, próxima declaración antes de marzo 2024) Contratos de tratamiento con Gestores de Residuos Autorizados Fichas de aceptación y Notificaciones previas para los residuos que lo requieren. Validez documentos de 3 años, actualizados según fecha de caducidad específica de cada documento Inscripción en el Registro de Productores de Producto (REGAGE23e00021229523) Registro territorial del impuesto especial sobre el envase de plástico no reutilizable (CIP ES00008AP547A) 	<ul style="list-style-type: none"> Decree 93/1999, of April 6, on waste management procedures Royal Decree 180/2015, of March 13, which regulates the transfer of waste within the territory of the State Law 7/2022, of April 8, on waste and contaminated soil for a circular economy Royal Decree 1055/2022, of December 27, on packaging and packaging waste Order HFP/1314/2022, of December 28, approving model 592 "Special tax on non-reusable plastic containers. Self-assessment" and model A22 "Special tax on non-reusable plastic containers. Application for return", the form and procedure for its presentation are determined, and the inscription in the Territorial Registry, the keeping of the accounts and the presentation of the stock registry book are regulated
Noise	<ul style="list-style-type: none"> Periodic control (voluntary control every five years) of the noise immission levels in the external environment in the identified sources. Last measurements made in July and October 2020 and March 2021, next control before July 2025) 	<ul style="list-style-type: none"> Regulation of noise and vibrations of Mataró

10. RELEVANT NEWS



 Sustainability Hub

Management Statement: Sustainability will become a stronger part of our thinking and actions at HARTMANN

Dear colleagues,

Never before has the topic of "sustainability" been so dominant on the agenda of society, politics and industry. Non-governmental organizations, but also individuals, are making concrete demands on how life can be improved worldwide in the future. This involves not only ecological aspects, but also social and economic ones.

We notice this directly at HARTMANN. Customers attach importance to concrete measures to protect the environment, as do our business partners. Politicians are introducing laws that have an impact on our business. These developments are right and important – HARTMANN is aware of its responsibility as part of society and will live up to it.

In the future, Stefan Grote and the Sustainability Task Force, which is made up of various functions, will define the sustainability strategy and, through targeted internal and external communication, take our colleagues, as well as customers, business partners and the general public, along with us on our journey.

In doing so, HARTMANN is building on very many initiatives in the area of sustainability. Whether in production, construction measures or products – our company has already proven worldwide that it acts sustainably. Kneipp and CMC are driving this commitment just as strongly and are already well advanced in their actions. Awards, including the German Sustainability Award for Kneipp, are proof of this action.

We are now bringing all these measures together, making them transparent, here on the digital hub now and in spring 2022 in our sustainability report.

We use this evidence as a starting point. Sustainability will become a stronger part of our thinking and actions at HARTMANN. We therefore ask you: take an active part in this change at HARTMANN so that we can make our company, but also our life together, a little better.

Yours

Britta Fünfstück
CEO

Stefan Grote
Member of the Board of Management



Un paso más hacia la sostenibilidad

 Torner Maurici
Brand Marketing Communication



En HARTMANN llevamos años trabajando con unos altos estándares de calidad y medio ambiente. Hace unos años empezamos un nuevo reto – la sostenibilidad, una apuesta de la compañía auspiciada por el programa **HARTMANN for future**.

En este sentido, y dando un paso más hacia ser una empresa responsable y respetuosa con el medio ambiente, hace unos días se han instalado torres de carga para coches eléctricos en HARTMANN Mataró, que juntamente con la flota de coches híbridos implantados en 2019, nos acerca un poco más al objetivo ODS 2030.



11. HSE PROGRAM: TARGETS AND ACTION PLAN

Analysis year 2022

Targets	Target value 2022	2022	2021	2020
Energy consumption (gas +electricity) / working hours (MWh/hours x 10)	<5.6	6.2	5.6	6.1
Waste indicator (%)	3.8	3.4	3.5	3.6
Raw material consumption ratio (component + primary packaging) vs. coated surface (kg/m ²)	<0.25	0.27	0.25	0.26
Environmental awareness actions	2	2	2	3

11. HSE PROGRAM: TARGETS AND ACTION PLAN

Analysis year 2022

We can see that the result obtained for waste, one of the main factory performance indicators with which the consumption of real raw material is evaluated vs. the calculated one has been satisfactory. Regarding the indicator of consumption of raw material component plus primary packaging vs. coated surface, has remained slightly above the target value. In the case of the energy consumption ratio indicator, the target value has not been achieved, mainly due to the increase in gas consumption. As the specific section on gas consumption has already been mentioned, we relate this increase to the malfunction of the factory air conditioning equipment, replaced in the second half of 2022.

We highlight in 2022:

Renovation of the factory air conditioners that will optimize gas consumption.

Improvement projects in the different productive sections to reduce waste. These actions help to optimize the consumption of raw materials and reduce the waste generated.

Environmental awareness actions focused on improving the segregation of waste.

Consolidation of the project for the recovery of silicone paper in the Cosmopor M12 machine

11. HSE PROGRAM: TARGETS AND ACTION PLAN

HSE program 2023

Table of targets defined for 2023 in terms of the environment:

Nr. target	Company	Vector	Target description	Indicator	Deadline
1	PHE	ENERGY EFFICIENCY	Electricity + gas consumption for 2023 < 6.2 MWh / working hours x 10 (2022 result)	Power consumption in MWh / working hours x 10	12/31/2023
2	PHSA	WASTE	Factory waste consolidation. Target maintenance 3.8%	Waste indicator	12/31/2023
3	PHSA	RAW MATERIAL CONSUMPTION	Reduction compared to 2022 in the weight of material for the product (backing material+adhesives+silicones+catalyst+wound-pad+sealing paper+silicone paper) per (m ² adhesive + m ² of already coated materials) Value 2022 = 0.26kg/m ²	(Product material + sealing paper) vs. coated surface + m ² of already coated materials (kg/m ²)	12/31/2023
4	PHSA	CARBON FOOTPRINT	Reduction in tons of CO _{2eq} associated with optimization actions for raw material consumption (Estimated reduction for 2023: 12tnCO _{2eq})	Emissions reduction CO _{2eq}	12/31/2023
5	LHSA	CARBON FOOTPRINT	Compensation of emissions generated by VM1 sales force	Tons CO _{2eq} compensated. Number of trees planted	12/31/2023
6	PHE	WASTE	Improvement in waste segregation and management	Nr. implemented actions	12/31/2023
7	PHE	WATER	Drought situation. Reduction of water consumption depending on the state of water reserves. In a state of Exceptionality target value reduction: 15%	Water consumption	12/31/2023
8	PHSA	COMMUNICATION AND AWARENESS HSE	E-learning training focus HSE for production operators	Nr. e-learning training	12/31/2023

11. HSE PROGRAM: TARGETS AND ACTION PLAN

HSE program 2023

Planned actions to achieve the defined targets:



Nr. target	Action
1	Installation of a new general meter for electricity consumption and integration into monitoring software + installation of a gas meter and integration into monitoring software
	Installation of photovoltaic panels
2 y 3	STRIPS Splicer wound-pad M15: Waste reduction
	STRIPS Splicer wound-pad M17: Waste reduction
	STRIPS Install unwinding groups M86: Reduce waste at each roll change
	OMNI Reduce waste associated with backing fabric material narrowing. Fabric improvements
4	Reduction in the weight of the silicone paper for OP-Tape
	Reuse silicone paper M07-M09-M11. First phase: reuse in M07 paper extracted in M11
5	Participation in reforestation projects with TREE NATION company. Compensation actions for CO _{2eq} emissions generated by VM1 sales force for the years 2023 and 2024
6	Hotmelt waste: look for alternatives to the current management of empty metal drums of acrylic adhesive as hazardous waste
	Improves waste segregation in offices: distribution of multi-compartment bins at different points in PHSA and LHSA offices
	Selective collection of paper/cardboard waste in canteen and coffee-point (including coffee glasses)
7	Distribute information posters as an awareness measure on taps and showers
	Implementation of monthly measurements of water hardness to prevent possible breakdowns of the inlet water softening equipment
	Reduce toilet cistern load
	Awareness action with CLECE (in relation to cleaning containers, etc.)
	Include a specific point on drought and water saving in periodic HSE training
8	E-learning training focus HSE for production operators

12. ENVIRONMENTAL COMMUNICATION

Internal and external environmental communication at all levels and functions



FOLLOW-UP MEETINGS

They are performed for the staff of PHSA (production and offices). Key indicators of the company and relevant aspects of the integrated management system are presented.

They usually include training / information content on Quality and HSE.

DDS MEETINGS

Daily meetings are performed in the sections with the participating of Production, Planning and HSE. In terms of HSE, incidents are discussed and are used as a channel of communication to all employees.

ENVIRONMENTAL NON-COMPLIANCES

Any collaborator can transmit to the environmental department a deviation or opportunity for improvement in environmental matters.

ENVIRONMENTAL STATEMENT

The management edits this Environmental Statement each year.

The statement is available in both print and online versions (Hartmann web), in order to inform our customers, suppliers and any other person or institution.

ENVIRONMENTAL COMMITTEE

Made up of worker and company representatives with periodic meetings. In 2022, a total of 4 meetings were held in which, among other points, the different objectives, actions and indicators included in the environmental program are monitored.

SUSTAINABILITY REPORT

The Sustainability Report of PAUL HARTMANN ESPAÑA S.L. includes the company PAUL HARTMANN S.A. It is a document verified by an accredited entity, mandatory and is available on the Hartmann website.

12. ENVIRONMENTAL COMMUNICATION

Environmental Statement verified by LRQA ESPAÑA, S.L.U.

Accreditation number: 016-V-EMAS-R

Verification technician: Josep Pla

LRQAE representative signing the statement: Olga Rivas

This environmental statement is communicated to employees, suppliers and customers through the company's website.

If you have any other questions, suggestions or information about our environmental management, please do not hesitate to contact us.

PAUL HARTMANN S.A.

Pol. Ind. Pla d'en Boet II • Carrasco i Formiguera, 48

E-08302 Mataró (Barcelona)

Telephone 93 741 71 00 • Fax 93 757 78 26

Contact person: Pilar Molina / Isabel Blanco – *HSE Department*

Email: informacion@hartmann.info

Web page: www.hartmann.info

